1 KING, HOLMES, PATERNO & SORIANO, LLP HOWARD E. KING, ESQ., STATE BAR NO. 77012 JOHN G. SNOW, ESQ., STATE BAR NO. 280790 JACKSON S. TRUGMAN, ESQ., STATE BAR NO. 295145 JTRUGMAN@KHPSLAW.COM 1900 AVENUE OF THE STARS, TWENTY-FIFTH FLOOR Los Angeles, California 90067-4506 TELEPHONE: (310) 282-8989 5 FACSIMILE: (310) 282-8903 Attorneys for Plaintiff Brian Warner p/k/a 6 Marilyn Manson 7 8 SUPERIOR COURT OF THE STATE OF CALIFORNIA 9 COUNTY OF LOS ANGELES, CENTRAL DISTRICT 10 11 BRIAN WARNER p/k/a MARILYN CASE NO. 22STCV07568 MANSON, 12 SUPPLEMENTAL DECLARATION OF HOWARD E. KING Plaintiff, 13 [Filed concurrently with: Opposition to Gore's VS. 14 anti-SLAPP Motion; Opposition to Wood's EVAN RACHEL WOOD; ASHLEY GORE anti-SLAPP Motion; King Declaration; Berk 15 Declaration; Warner Declaration; Balog a/k/a/ ILLMA GORE, Declaration; Weiss Declaration; Meyer 16 Defendants. Declaration; Kunkel Declaration; B. Gore Declaration; Opposition to Gore's RJN; Objections to Defendants' Evidence; Notice 17 of Lodging; Application to Seal; [Proposed] 18 Order Granting Sealing Application 19 December 1, 2022 Date: Time: 10:00 a.m. 20 Dept.: 50 21 The Hon. Teresa A. Beaudet, Dept. 50 22 Action Filed: March 2, 2022 Trial Date: Not Set 23 24 25 26 27 28

3310.096

DECLARATION

SUPPLEMENTAL DECLARATION OF HOWARD E. KING

I, Howard E. King, declare as follows:

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1. I am an attorney licensed to practice law in the State of California and serve as

counsel for Brian Warner p/k/a Marilyn Manson in the above-captioned action. The following facts are within my personal knowledge and, if called as a witness herein, I can and will competently testify thereto.

- 2. I previously executed a declaration that is being re-submitted, in addition to this declaration, in support of Warner's oppositions to Defendant Wood and Gore's anti-SLAPP motions. I begin exhibit lettering in this declaration where the last declaration left off.
- 3. I also note that Warner is submitting in support of his oppositions the Declarations of Blair Berk, Brian Warner, Bryton Gore, Emese Balog, and Paula M. Weiss, which were previously submitted in support of Warner's motion for limited discovery filed July 25, 2022. During that proceeding, Defendant Gore objected to certain portions of these declarations, and the Court sustained certain of those objections. Warner has endeavored to not cite or rely on portions of those declarations to which the Court previously sustained Gore's objections.
- 4. Attached as **Exhibit F** is a true and correct copy of excerpts from the October 15, 2022 transcript of the deposition of Defendant Gore. Gore's counsel designated the entirety of the transcript as "Confidential" under the Protective Order entered October 13, 2022, so an unredacted copy is being lodged conditionally under seal.
- 5. Attached as **Exhibit G** is a true and correct copy of a document marked as Gore Ex. 1 at the October 15, 2022 deposition of Defendant Gore. The unmarked version of this exhibit was attached as King Exhibit B.
- 6. Attached as Exhibit H is a true and correct copy of a document marked as Gore Ex. 3 at the October 15, 2022 deposition of Defendant Gore. The unmarked version of this exhibit was attached as King Exhibit D.
- 7. Attached as **Exhibit I** is a true and correct copy of a document marked as Gore Ex. 15 at the October 15, 2022 deposition of Defendant Gore; out of an abundance of caution, an unredacted copy is being lodged conditionally under seal.

1	8. Further	er attached hereto are a number of documents found on the iPad described in
2	the Declaration of Br	yton Gore and the Declaration of Michael Kunkel:
3	a.	Exhibit J is a true and correct copy of the file named "5005_29894.JPG"
4	dated September 22,	2020.
5	b.	Exhibit K is a true and correct copy of the file named "5005_10966.JPG"
6	dated September 25,	2020.
7	c.	Exhibit L is a true and correct copy of the file named "5005_21553.JPG"
8	dated September 25,	2020.
9	d.	Exhibit M is a true and correct copy of the file named "5005_13129.JPG"
10	dated September 25,	2020.
11	e.	Exhibit N is a true and correct copy of the file named "5005_16096.JPG"
12	dated September 25,	2020.
13	f.	Exhibit O is a true and correct copy of the file named "5005_21113.JPG"
14	dated October 11, 20	20.
15	g.	Exhibit P is a true and correct copy of the file named "5005_20978.JPG"
16	dated October 11, 20	20.
17	h.	Exhibit Q is a true and correct copy of the file named "5005_22160.JPG"
18	dated October 11, 20	20.
19	i.	Exhibit R is a true and correct copy of the file named "5005_30096.JPG"
20	dated October 19, 20	20.
21	j.	Exhibit S is a true and correct copy of the file named "5005_49421.JPG"
22	dated October 19, 20	20.
23	k.	Exhibit T is a true and correct copy of the files named "5005_32312.JPG,"
24	"5005_34346.JPG,"	"5005_40135.JPG," dated January 31, 2021.
25	1.	Exhibit U is a true and correct copy of the file named "5005_28200.JPG"
26	dated February 9, 20	21, which has been redacted because it contains nudity.
27	m.	Attached as Exhibit V is a true and correct copy of frames from the credit

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28 sequence of Warner's 1998 film "Dead to the World."

- 9. Four additional documents attached hereto were also found on the iPad described in the Declaration of Bryton Gore and the Declaration of Michael Kunkel:
- a. **Exhibit W** is a true and correct copy of the file named "5005_18982.JPG" dated September 21, 2020, which has been redacted to obscure private login information.
- b. **Exhibit X** is a true and correct copy of the file named "5005_22042.JPG" dated September 22, 2020, which has been redacted to obscure private login information.
- c. **Exhibit Y** is a true and correct copy of the file named "5005_26239.JPG" dated August 20, 2020, which has been redacted to obscure the street number, street name, and assessor ID of Warner's former residence.
- d. **Exhibit Z** is a true and correct copy of the file named "5005_49956.JPG" dated August 21, 2020, which has been redacted to obscure the street number and street name of Warner's former residence.
- 10. In connection with Warner's oppositions, he has submitted an application to seal portions of the Declaration of Michele Meyer. The declaration contains allegations of wrongdoing against a third party. That third party is not a party to this action and the third party's identity *per se* is not at issue or relevant to defeating Wood and Gore's anti-SLAPP motions. However, if the third party's identity is revealed through Plaintiff's filing of the unredacted document—a declaration received from third party Meyer—Plaintiff will have caused to become public those matters discussed in the declaration that concern the third party, which may bring harm to the third party, Warner, and/or the declarant, given the nature of the allegations and this action. If the declarant wishes to take responsibility for making this information public, that should be her doing, not Warner's. The proposed redactions to the declaration received from Meyer are only the third party's name and other identifying information, and thus the proposed sealing is narrowly tailored and no less restrictive means exist to protect the third party privacy interest.
- 11. Plaintiff served Gore with redacted and unredacted versions of the document, as she apparently is already aware of the identity of the third party. Plaintiff served Wood with a redacted version of the document, as it is unknown to Plaintiff at this time whether Wood is aware of the identity of the third party as it concerns Meyer's allegations.

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I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on this 15th day of November 2022, at Los Angeles, California.

/s/ Howard E. King Howard E. King

3310.096/1872684.1

EXHIBIT F

EXHIBIT G



Follow

@illmagore

Artist, 2D/3D designer, Jr. software developer. For inquires and complaints please email

© Los Angeles & foundation.app/illmagore

::: Joined April 2012

661 Following **3,939** Followers

Not followed by anyone you're following

Tweets

Tweets & replies

Media

Likes



Illma Gore 🐶 @illmagore · 3h

Obviously, my art and my life have long been magnets for controversy, but these recent claims about me are horrible distortions of reality

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Illma Gore 🐶 @illmagore · 3h

Before publishing images be aware that photos and images from my hard drives have been registered with U.S. Copyright office. This documentation names me as the rightful copyright owner. I have not nor will give permission to use them.

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Illma Gore 🐶 @illmagore · 3h

Bring it the fuck on you rapist pedophile motherfucker

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Who to follow



WITNESS ES

@witness es









Follow

Exhibit 0001 Ashley IIIma Gore



EXHIBIT H





September 30, 2020

Exhibit 0003 Ashley Illma Gore

Hey! This is random and completely uncalled for but my name is Illma, I'm a friend of Evan Rachel Wood and I help run the Phoenix Act. I just wanted to reach out and say there is a group of survivors of violence here with similar experiences. And if for whatever reason you ever wanted to talk about what I do for Phoenix or even just touch base to be connected to everyone else at the very least. Know that you can at any point.

Best, Illma







October 03, 2020

I'll be really candid with you. I run Phoenix alongside Evan Rachel Wood.We ran into lots of teenagers being groomed by adults in the music industry.

Evan, ex staff and other speak about the groupie video.

We know it isn't released because the girl was underage. And the content that is in it horrifies people.

I don't think it's right for it to be shown to people and it still is.

I believe it is Jeanette in





I believe it is Jeanette in the video.

But I can only tell by the index finger rings and bracelets.

FBI got involved & we've been working with them. Because unfortunately there were many more teens subjected to abuse.

But mainly, I found sistinas livejournal of you, Jeanette and Alison.

I know the police pulled them out of the band situation in NY at some point.

And I know it's probably





And I know it's probably very weird to read about this from a complete stranger but I felt compelled to check in because of the abuse suffered from other teenagers.

And that there's a group here. If you ever wanted that.

But there's no pressure to be involved in anyway

And I recognize this must be a hard message to read



EXHIBIT I

EXHIBIT J



+1 (619) 933-

id love to organize a standard Protocol for reaching out to victims.

I want to make sure we cover all bases to make sure nothing reaches back to Manson and he finds out there FBI investigation that triggers him to delete evidence before a warrant is issued

Either you and I reach out to victims:

- Reach out via social media email etc
- 2. Make introduction phone call about doc and let them know there is no pressure on their end but also there is a group of victims/survivors organizing and they are a welcome part of that group or documentary
- 3. Organize a meeting in person with me (I will fly anywhere)
- 4. Phone call with Evan and team

Let me know if you have any thoughts/concerns/edits.





iMessage









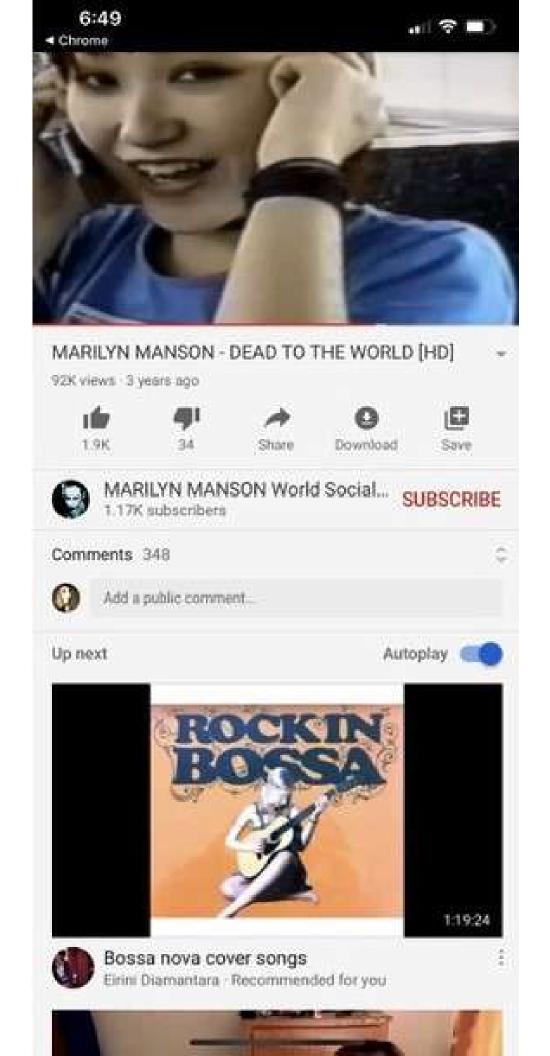








EXHIBIT K







MARILYN MANSON - DEAD TO THE WORLD [HD]

92K views 3 years ago











Save



MARILYN MANSON World Social... SUBSCRIBE 1.17K subscribers

Comments 348



Add a public comment.

Up next









Review Of The Anycubic I3 Mega X 3D Printer

ModBot - Recommended for you

EXHIBIT M



a google.com





DAW The Lost Media Wiki

Visit

Groupie (partially found Marilyn Manson short film; 1996-1998

images may be subject to copyright. Learn More-

Related images



Marilyn Manson's Groupie : Lost_Films reddit.com



Grouple (Late 90s Short Film by Marily ... Tostmedisarchive fandom.com.













EXHIBIT N

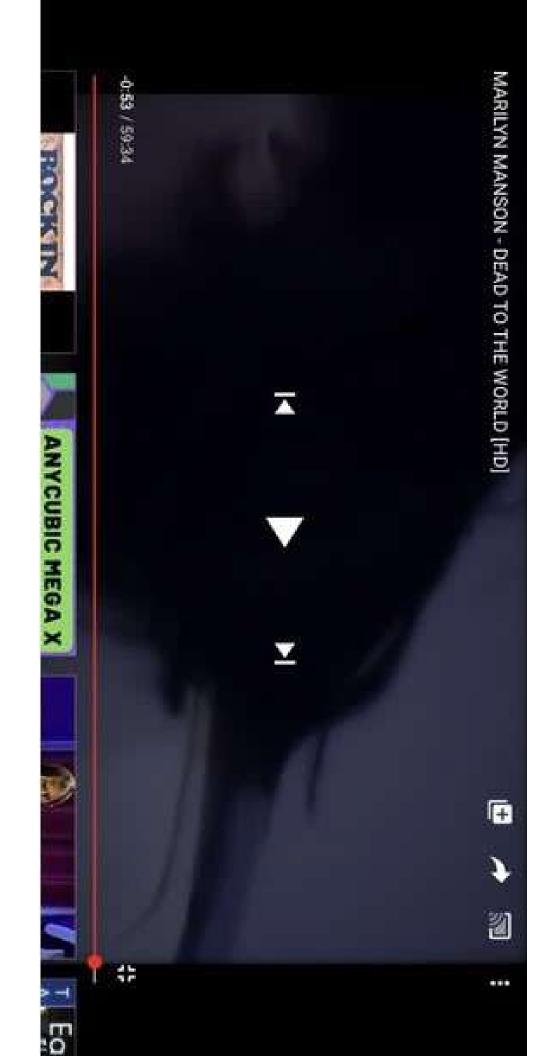


EXHIBIT O



fbi.gov



program. Most of the human trafficking victims in our cases are U.S. citizens, and we take a victim-centered approach in investigating such cases, which means working to address the victim's needs first.

Overview

Here in this country, people are being bought, sold, and smuggled like modern-day slaves, often beaten, starved, and forced to work as prostitutes or to take jobs as migrant, domestic, restaurant, or factory workers with little or no pay. Human trafficking is a heinous crime that exploits the most vulnerable in society.

Under the HumanTrafficking program, the Bureau investigates:

- Sex Trafficking: When persons, both U.S. citizens and foreign nationals, are compelled to engage in commercial sex acts through the use of force, fraud, or coercion. Sex trafficking of a minor occurs when the victim is under the age of 18. For these cases it is not necessary to prove force, fraud, or coercion.
- Labor Trafficking: When persons, both U.S. citizens and foreign nationals, are compelled to performed labor or services through the use of force, threats of force, physical restraint, or threats of physical restraint; serious harm or threats of serious harm; abuse or threatened abuse of law or legal process; or coercion.

Human Trafficking Task Forces

The most effective way to investigate human trafficking is through a collaborative, multi-agency approach with our federal, state, local, and tribal partners.

 FBI Child Exploitation and Human Trafficking Task
 Forces operate within nearly every FBI field office to collaborate with state and local law enforcement

EXHIBIT P



a shouselaw.com





Call us 24/7: C



purposes of prosintation,

- PC 311.1 or 311.2 transporting or distributing child pornography,
- PC 311.3 developing, duplicating, printing, or exchanging child pomography,
- PC 311.4 employing minors to participate in child pomography,
- PC 311.5 advertising obscene material,
- PC 311.6 production of obscene live performances, and
- PC 518 extortion/blackmail.¹³

Example: Marcus is part of a sex trafficking case that brings young women from Russia to the United States on take passports, promising them jobs in restaurants in the U.S.

But in fact, once the women reach the U.S., they are kept as near-prisoners in a private home, given drugs and alcohol, subjected to sexual abuse, and made to work as prostitutes. They are told that they will be

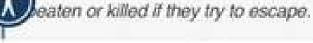










EXHIBIT Q



#MarilynManson #LongHardRoadOutOfHell #Vevo

Marilyn Manson - Long Hard Road Out Of Hell (Official Video)

15M views - 10 years ago



127K











Save



Marilyn Manson 2.88M subscribers

SUBSCRIBE

Comments 11K



He's weird but we need more songs like this in 2020. He's one of my favourite artists and I miss his beautiful songs!

Buy Marilyn Manson merchandise

From Merchbar



\$31.10







EXHIBIT R



EXHIBIT S





Hey Charlyne,

I'm reaching out with more information about the meet up we spoke briefly over text about. It is a small informal meetup Evan and Esme are hosting with about 6-10 people that have a similar or the same experience as you.

This message is a personal and private invite from Evan, as it would be really powerful to have you there.

Here are the details on Zooming you into the conference:

ZOOM meeting information

- A Zoom link will be provided to you on October 20th, 2020
- Please wear airpods or headphones
- You will be asked to record your Zoom screen
- If you are anonymous on your Zoom call, I can provide a screen background for you and voice changing instructions
- The meeting will be filmed for documentation purposes but you will not be asked to do a solo interview
- You can ask to be anonymous, before and at anytime after filming
- You will be updated before any captured footage will be used <u>privately or publicly</u>.



Message

i was contacted by marylin manson (brian warner) while modelling overseas in bangkok, thailand in 2009/2010. i genuinely didn't really know who he was, i think i had heard of him in high school, we had a mutual photographer friend, he said he needed me for an upcoming project. i was certainly weary at first, we talked about literature and film, he seemed intelligent and authentic and caring, after a very long time of talking and texting and eventually sending photos and grooming, he flew me out to los angeles to be part of a film and a photo series, he said he believed in me as an actress, and i'd wanted to get out of modelling, it seemed perfect, at first, it was, he was like many of the musicians i'd met... just cocaine and absinthe, he made me feel safe, he told me he'd protect me. i went from the roosevelt hotel to living with him quickly, and things turned dark very quickly, and i was given rules and got "in trouble" for any behaviour he didn't approve of, there was abuse, sexual violence and violence and coercion in the name of art, i still feel the affects everyday, i have night terrors, ptsd, anxiety, and mostly crippling OCD one can imagine trying to wash my times with him out or off of me, he asked me to bring him nazi memorabilia, there is so much in asia, that was hidden during WW2, he wanted everything i could find... i brought him swastika throwing stars, knives, rings, it felt so wrong, although i am jewish. he said he only dated jowich girle, and it was just a



Message

une magiciona co mec... juat cocomo ema absinthe, he made me feel safe, he told me he'd protect me. i went from the roosevelt hotel to living with him quickly, and things turned dark very quickly, and i was given rules and got "in trouble" for any behaviour he didn't approve of, there was abuse, sexual violence and violence and coercion in the name of art, i still feel the affects everyday, i have night terrors, ptsd, anxiety, and mostly crippling OCD one can imagine trying to wash my times with him out or off of me, he asked me to bring him nazi memorabilia, there is so much in asia, that was hidden during WW2, he wanted everything i could find... i brought him swastika throwing stars, knives, rings, it felt so wrong, although i am jewish, he said he only dates jewish girls, and it was just a joke between us, i brought him all of this horrible stuff, and feel so much guilt and shame, i repressed the memories of him for nearly as long as i could, i wanted to believe it never happened and he wasn't hurting people the way he hurt me, shamed me, publicly embarrassed me, he would throw me out of the house in next to no clothing if i did something so horrible as fall asleep at 3 am. i wasn't to eat, or sleep, or leave, i was awoken with loud music if i fell asleep, i was punished if i acted human, he made me feel like the cutting, burning, his fist in my mouth was "our thing" and i pretended i liked it. i feel like i did like it, or thought i did, it's all very confusing.

there is so much more that happened, and

Message

horrible stuff, and feel so much guilt and shame, i repressed the memories of him for nearly as long as i could, i wanted to believe it never happened and he wasn't hurting people the way he hurt me, shamed me, publicly embarrassed me, he would throw me out of the house in next to no clothing if i did something so horrible as fall asleep at 3 am. i wasn't to eat, or sleep, or leave. i was awoken with loud music if i fell asleep, i was punished if i acted human, he made me feel like the cutting, burning, his fist in my mouth was "our thing" and i pretended i liked it. i feel like i did like it, or thought i did, it's all very confusing.

there is so much more that happened, and i'm

still trying to remember to forget, i don't want him to do to anyone else the way he did to me, but i felt responsible for so long. i just thought it was somehow my fault. i know he is still doing this to a rotating door of young girls, and causing irreparable damage. i am coming forward so he will finally stop.

ashley lindsay morgan smithline

Sender ashley lindsay morgan smithline Sent Today 6:23 PM Received Today 6:23 PM

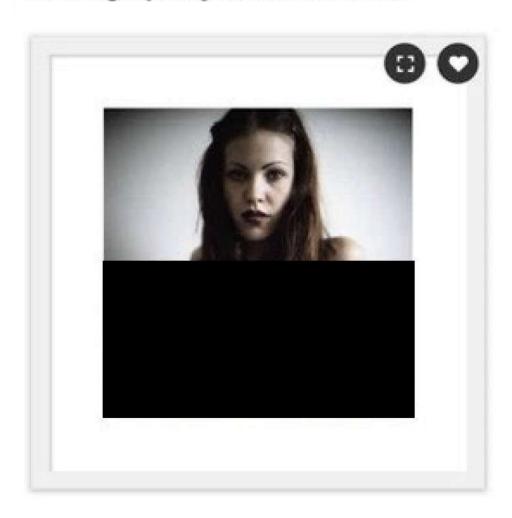




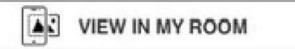
world. Learn More.

Browse Art I Photography I Cristina Nunez I Artworks I Pola, 1994. Limited edition of 6 + 2.

Pola, 1994. Limited edition of 6 + 2. Photograph by Cristina Nunez















Post Production Super Fox LISA KNAPP

Special Thanks
SOO-BUNS CHUNG
POLA WEISS
APRIL
RUTT VIDEO
ZEPP







Band:

MARILYN MANSON: vocals, guitar, pan flute

TWIGGS RAMIREZ: bass

PoGo: Keyboards

GINGER FISH: drums

ZIM ZUM: guitar





Touring Crew:

GARY GROSJEAN JOHN ZUCKER

AARON DILKS

MASI WILLIAMS LARRY SAPP

EATHAN WEBER

LAWRENCE UPTON CHRIS SCHLEYER

STEVE WODA

TONY GIAMPAOLO

JOHN VAN EATON MATT HARTMAN

KEVIN BRIERS

GARRETT RENZ

MIKE NASTASSI

GREG "GRIT"

FREDERICK

BRAD JUDD

JOSEPH "ZEPP" SAVINI

Management: TONY CIULLA SILVIA GARCIA

Special Thanks:

DAVID CODIKOW ALEX KOCHAN

DEBBIE MORRISON JAY SENDYK

JOHN A. MALM, JR.

PAUL CAMBRIA MAX MUELLER

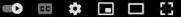
ANN BRUBAKER

JEFF ANDERSON JENNIE BODDY

DIANE MAYER EDWIN CAMACHO

EMMA BANKS









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KILL THE CHICKENS



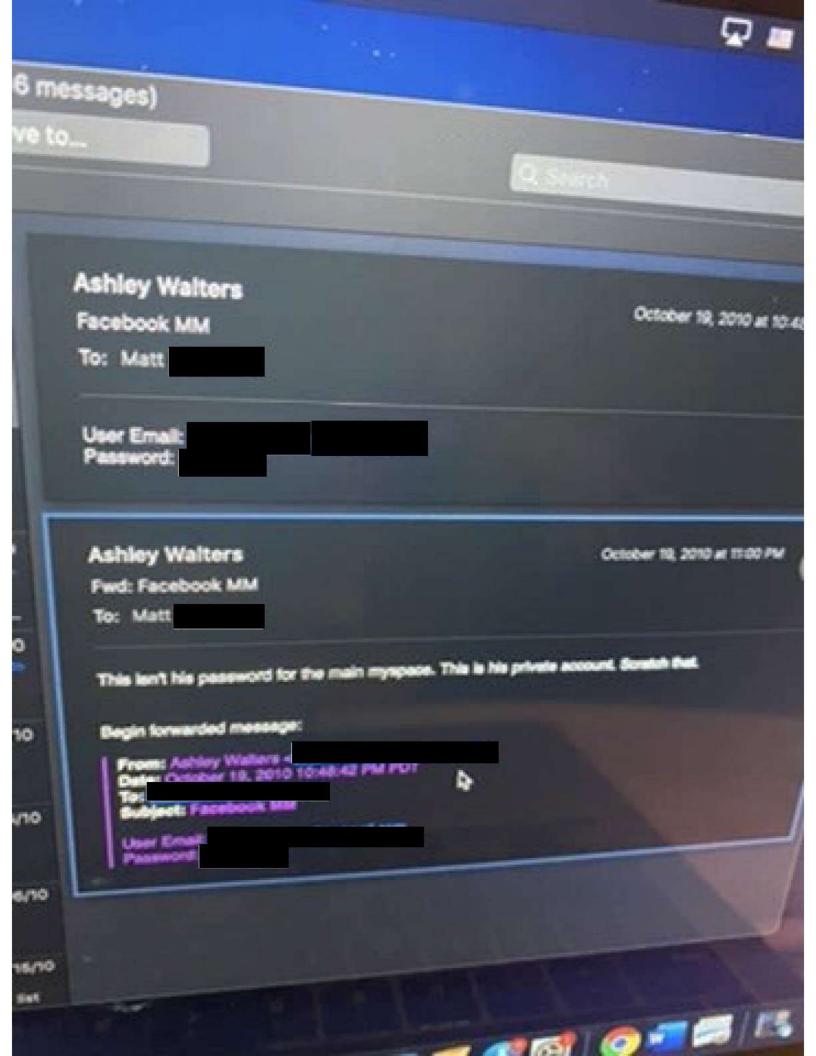
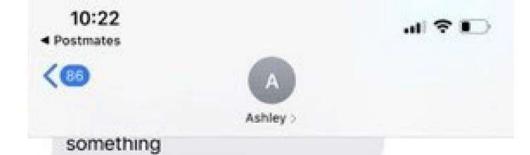
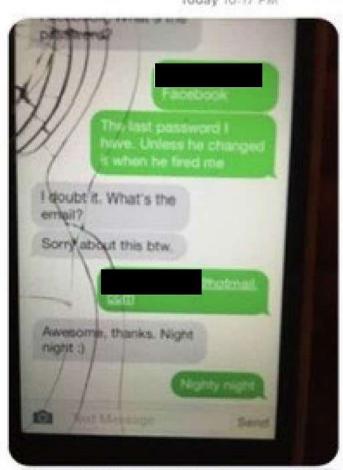


EXHIBIT X



Today 10:17 PM



I haven't found MySpace one but I found a text chain with a guy that use to edit his websites. This was the very last login I had from Facebook. Still looking for other...



EXHIBIT Y

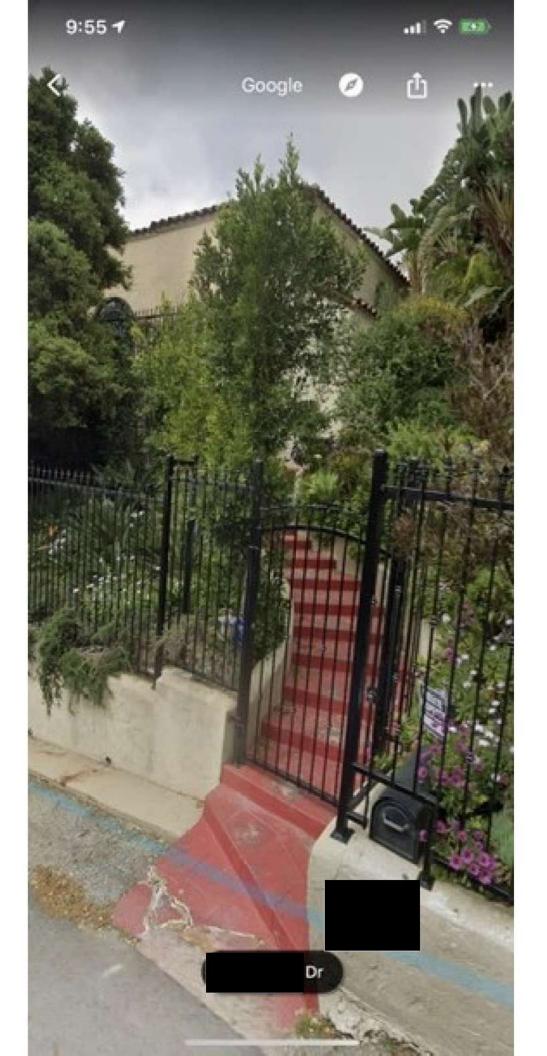


EXHIBIT Z



▲ maps.assessor.lacounty.gov



I want to...









- Property records are kept at the East District Office
- How frequently is this site updated? (and other FAQs)

Property Information

Assessor's ID No:

012

Address:

DR LOS

ANGELES CA 90068

Property Type:

Single Family Residential

Region / Cluster:

04 / 04190

Tax Rate Area (TRA):

00013

- View Assessor Map
- View Index map

Recent Sales Information

Latest Sale Date:

Indicated Sale Price:

Search for Recent Sales

2020 Roll Values

Recording Date: 10/03/2013

Land: \$784,625

Improvements: \$336,267

Personal Property: \$0

Fixtures: \$0

Homeowners' \$0

Exemption:

Real Estate Exemption: \$0

Personal Property \$0

Exemption:

Fixture Exemptions: \$0









1 PROOF OF SERVICE 2 Brian Warner p/k/a Marilyn Manson v. Evelyn Rachel Wood, et al. **Case No. 22STCV07568** 3 STATE OF CALIFORNIA, COUNTY OF LOS ANGELES 4 At the time of service, I was over 18 years of age and not a party to this action. I am 5 employed in the County of Los Angeles, State of California. My business address is 1900 Avenue of the Stars, Twenty-Fifth Floor, Los Angeles, CA 90067-4506. 6 On November 15, 2022, I served true copies of the following document(s) described as 7 SUPPLEMENTAL DECLARATION OF HOWARD E. KING on the interested parties in this action as follows: 8 SEE ATTACHED SERVICE LIST 9 BY E-MAIL OR ELECTRONIC TRANSMISSION: I caused a copy of the document(s) to be sent from e-mail address Eweinberger@khpslaw.com to the persons at the email addresses listed in the Service List. 11 I declare under penalty of perjury under the laws of the State of California that the 12 foregoing is true and correct. 13 Executed on November 15, 2022, at Los Angeles, California. 14 15 /s/ Eniko Weinberger Eniko Weinberger 16 17 18 19 20 21 22 23 24 25 26 27 28

KING, HOLMES, PATERNO & SORIANO, LLP

Case No. 22STCV07568

SERVICE LIST 1 Brian Warner p/k/a Marilyn Manson v. Evelyn Rachel Wood, et al. 2 **Case No. 22STCV07568** 3 Katherine T. Kleindienst, Esq.; Attorneys for Defendant Evan Rachel Wood Michael J. Kump. Esq. 4 Shawn Holley, Esq. Mary Sanks 5 Kinsella Weitzman Iser Kump Holley LLP 808 Wilshire Boulevard, 3rd Floor Santa Monica, CA 90401-1894 (310) 566-9800 Tel: 7 Fax: (310) 566-9873 Email: KKleindienst@kwikhlaw.com Email: MKump@kwikhlaw.com Email: SHolley@kwikhlaw.com 9 Email: MSanks@kwikhlaw.com 10 Lawrence M. Cirelli, Esq. Attorney for Defendant Ashley Gore a/k/a Illma Maggie Ziemianek, Esq. Gore 11 Thomas Rivera, Esq. Debbie Estebanez 12 Hanson Bridgett LLP 425 Market Street, 26th Floor 13 San Francisco, CA 94105 Tel: (415) 995-6438 14 Fax: (415) 995-3457 Email: lcirelli@hansonbridgett.com Email: MZiemianek@hansonbridgett.com 15 Email: TRivera@hansonbridgett.com 16 Email: destebanez@hansonbridgett.com 17 18 19 20 21 22 23 24 25 26

KING, HOLMES, PATERNO & SORIANO, LLP

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