

1 KING, HOLMES, PATERNO & SORIANO, LLP  
 HOWARD E. KING, ESQ., STATE BAR NO. 77012  
 2 JOHN G. SNOW, ESQ., STATE BAR NO. 280790  
 JACKSON S. TRUGMAN, ESQ., STATE BAR NO. 295145  
 3 JTRUGMAN@KHPSLAW.COM  
 1900 AVENUE OF THE STARS, TWENTY-FIFTH FLOOR  
 4 LOS ANGELES, CALIFORNIA 90067-4506  
 TELEPHONE: (310) 282-8989  
 5 FACSIMILE: (310) 282-8903

6 Attorneys for Plaintiff Brian Warner p/k/a  
 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  
 MANSON,

12 Plaintiff,

13 vs.  
 14

15 EVAN RACHEL WOOD; ASHLEY GORE  
 a/k/a/ ILLMA GORE,

16 Defendants.  
 17  
 18

CASE NO. 22STCV07568

**DECLARATION OF MICHELE MEYER**

[Filed concurrently with: Opposition to Gore’s  
 anti-SLAPP Motion; Opposition to Wood’s  
 anti-SLAPP Motion; King Declaration;  
 Supplemental King Declaration; Berk  
 Declaration; Warner Declaration; Balog  
 Declaration; Weiss Declaration; Kunkel  
 Declaration; B. Gore Declaration; Opposition  
 to Gore’s RJN; Objections to Defendants’  
 Evidence; Notice of Lodging; Application to  
 Seal; [Proposed] Order Granting Sealing  
 Application]

Date: December 1, 2022  
 Time: 10:00 a.m.  
 Dept.: 50

The Hon. Teresa A. Beaudet, Dept. 50

Action Filed: March 2, 2022  
 Trial Date: Not Set

**DECLARATION OF MICHELE MEYER**

I, Michele Meyer, declare as follows:

1. The following facts are within my personal knowledge and, if called as a witness herein, I can and will competently testify thereto.

2. I am an attorney licensed to practice law in the states of California, New York and Massachusetts.

3. I met Brian Warner p/k/a Marilyn Manson (“Warner”) in 2013. Though Warner is best known for his music, we developed a social relationship due to my interest in his artwork and became friends. Over the next several years, I saw Warner at his birthday parties, social gatherings, private dinners, and shows. We have communicated on and off over the last nine years.

4. I am the victim of an ongoing scheme of harassment and stalking by [REDACTED]. This scheme has taken the form of threatening behavior both online and in person, including threats to my life and to my license to practice law.

5. I am also a victim of Ashley Gore a/k/a Illma Gore (“Gore”) and Evan Rachel Wood’s (“Wood”) unauthorized and illegal use of my phone number on a forged FBI letter.

6. On or around September 30, 2020, a woman I met online who was having similar issues with [REDACTED] [REDACTED] messaged me on Instagram about Gore contacting her on Instagram. A true and correct copy of those messages, including the message Gore sent [REDACTED] are attached hereto as **EXHIBIT A.**

7. [REDACTED] spoke to me on the phone on October 1, 2020 and suggested that I contact Gore regarding [REDACTED] because Gore told her that there were other victims of [REDACTED] and that Gore wanted to help us.

8. On October 1, 2020, I messaged Gore through Instagram regarding [REDACTED] stalking and harassing me. I also gave her my phone number. A true and correct copy of those messages are attached hereto as **EXHIBIT B.**

1           9.       Gore and I spoke on the phone several times in early October 2020. During these  
2 calls, we discussed ██████████ stalking and harassment. Gore said she had spoken to other victims  
3 of ██████████ Gore told me that she could put me in direct contact with her contact at the FBI who  
4 was handling investigations regarding Warner. She told me that the lead investigator's name was  
5 "Michelle." Gore said she would check with Michelle to see if I could reach out to her regarding  
6 ██████████ Gore promised me that she would not share my phone number or any information about  
7 me with anyone other than Michelle at the FBI. Gore said Warner was being investigated for  
8 numerous alleged crimes including, but not limited to, rape, human trafficking, and child  
9 pornography. She stated that Warner was part of a criminal enterprise involving racketeering.  
10 Gore said that she and Wood had been collecting evidence for three (3) years and reaching out to  
11 women, including multiple teenagers. Gore said they were also offering legal help and security.  
12 Gore stated that in doing that work, they got in contact with a federal investigator. Gore also told  
13 me that she and Wood got Esme Bianco ("Bianco") involved. Gore said they had hard drives full  
14 of evidence against Warner and were six (6) weeks away from a warrant. Gore told me they had  
15 enough evidence to make an arrest. True and correct copies of the call logs are attached hereto as  
16 **EXHIBIT C.**

17           10.       Gore also told me that Warner had abused underage girls and was involved in the  
18 creation and distribution of child pornography. Gore talked to me about a film Warner made in  
19 the 1990s called "Groupie." Gore told me the following: the girl in Groupie was underage; the  
20 girl was 16 years old when it was filmed; Warner knew the girl was underage; the girl did not  
21 consent to everything that happened during filming; the film was child pornography; and, the girl  
22 had a hard time with what happened during filming and the girl committed suicide. Gore stated  
23 that she talked to the girl's family members about the filming of Groupie and the girl's suicide.  
24 Gore said that even though Groupie has its own IMDB page, it doesn't credit the girl, and the  
25 girl's name was removed from the credits for everything she appeared in, such as Warner's "Long  
26 Hard Road Out of Hell" music video, so that when she was alive, no one would be able to find her  
27 and ask her about Groupie. Gore told me that Groupie contained evidence of felonies and Warner  
28 would be indicted.

1 11. I am aware that the actress from Groupie, Paula Weiss p/k/a Pola Weiss, has since  
2 come forward and publicly stated that she was approximately 21-22 years old at the time of  
3 filming, she was a paid actress, credited for her work, and she was not abused by Warner.

4 12. On an October 7, 2020 phone call with Gore, Gore told me that she spoke to  
5 Michelle at the FBI, and Michelle told Gore to pass Michelle's contact information to me. Gore  
6 said she would send me Michelle's contact information.

7 13. On October 14, 2020, Gore messaged me using WhatsApp. Gore attached the  
8 contact information for Michelle from the FBI and said, "Hey! This is the contact to the  
9 investigation for you to leave a message. She will direct you to the right person[.] She probably  
10 won't answer but leave a message[.]" When I clicked on the contact attachment, it said "Michelle"  
11 with "FBI Sex Crimes" under her name and a phone number with an Orlando, FL area code. A  
12 true and correct copy of these messages, including Michelle's contact information sent to me by  
13 Gore are attached hereto as **EXHIBIT D**.

14 14. Following this conversation with Gore, I called the phone number she provided,  
15 and left a message for "Michelle Langer." I never received a call back.

16 15. On December 22, 2020, I received voicemails on the phone I had used to talk with  
17 Gore, from two people I do not know. The callers left voicemails looking for Michelle Langer. I  
18 have retained copies of these recordings. The first two messages were from Shawn Holley  
19 ("Holley"). True and correct copies of the voicemail/missed call logs for Holley are attached  
20 hereto as **EXHIBIT E**. The third message was from Jamie Bell ("Bell"). A true and correct copy  
21 of the voicemail/missed call log for Bell is attached hereto as **EXHIBIT F**.

22 16. Holley's first voicemail is as follows:

23 "Hi. Good morning. This message is for Michelle Langer. My name is  
24 Shawn Holley S-H-A-W-N H-O-L-L-E-Y. This is a really bad connection. I think  
25 I'm gonna call back. Bye."

26 17. Holley's second voicemail is as follows:

27 "Hi it's Shawn Holley again. Hopefully this is better. Um I am a lawyer in  
28 Los Angeles and I represent Evan Rachel Wood. And um I was just hoping we

1 could touch base at some point um and perhaps I could be the point person cause,  
2 you know, for obvious reasons she doesn't um, you know, have an understanding  
3 of everything that's happening and I'm not saying that I will either, but as a lawyer  
4 who works in the criminal justice system, I'm probably a better person to explain  
5 things and act as a go-between or liaison if that is okay with you. Um my name is  
6 again Shawn S-H-A-W-N Holley H-O-L-L-E-Y. My cell phone number is the best  
7 way to reach me 323-397-[REDACTED]. That s 323-397-[REDACTED]. My  
8 email address is S-H-O-L-L-E-Y @[REDACTED] sholley@[REDACTED]. It is  
9 10:45 on Tuesday. Um I know it's a holiday week and hopefully people are already  
10 on vacation mode, but if you have a minute to spare to give me a call whenever you  
11 can, I greatly appreciate it. Thank you. Happy holidays.”

12 18. Bell's voicemail is as follows:

13 “Hi uh I believe I'm looking for Michelle Langer of the Federal Violent  
14 Crimes Department. Um my name is Jamie Bell. I'm calling in regards to uh uh  
15 Evan Rachel Wood. She is the mother of my son Jack Donovan Bell. She has  
16 informed me that it's important that I contact you um regarding uh uh what's going  
17 on. I'm actually completely unaware of what's happening. Um so I've been told to  
18 reach out to you. Um my cell phone number, I live in California, I have pretty bad  
19 uh cell phone reception um but I'll give it to you anyway. My cell is 917-216-  
20 [REDACTED]. Um let me give you my home number also. We're home most of  
21 the day. Oh who isn't, I know. Um the number is 323-460-[REDACTED]. Um I'd  
22 appreciate a call back uh at your earliest convenience. Thank you so much. Bye.”

23 19. I did not know why Holley and Bell were calling me because I had never met them,  
24 spoken to them, or given them my phone number. I also did not know why they were calling me  
25 looking for Michelle Langer. Gore had promised me she would not share my phone number or  
26 any of my information with anyone other than Michelle Langer at the FBI and solely in  
27 connection with [REDACTED] stalking and harassment of me, so I was shocked that Gore had  
28 apparently either given my phone number to Holley and Bell or had given my phone number to

1 Wood who then gave my phone number to Holley and Bell, and likely told Holley and Bell that  
2 my phone number belonged to Michelle Langer.

3 20. On December 22, 2020, I sent Gore a message on WhatsApp. Referring to the two  
4 callers, I told Gore that, "I just received 2 voicemails on my cell just now looking for Michelle  
5 Langer. Shawn Holley called saying she represents Evan and Jamie Bell called saying he's the  
6 father of Jack Bell. I haven't returned the calls to tell them they have the wrong person. Do you  
7 want me to call them or can you and Evan sort it out on your end?" Gore responded stating,  
8 "Don't respond I'll have it fixed immdelty [sic][.] Sorry for that. Someone got the numbers mixed  
9 up[.]" A true and correct copy of our messages are attached hereto as **EXHIBIT G**.

10 21. Gore also sent me a message on WhatsApp stating, "Thanks for reaching out. I also  
11 spoke to fbi [sic] recently[.] I have some updates for you when you're free to talk[.]" Gore then  
12 gave me a different phone number from which she would be calling me. A true and correct copy  
13 of those messages are on page 2 of **EXHIBIT G**

14 22. Gore and I then spoke on the phone on December 22, 2020. Gore told me, among  
15 other things, that there were now six victims of [REDACTED] stalking and harassment. Gore stated  
16 that Michelle from the FBI told her to tell people she was sorry for not getting in contact. Gore  
17 told me that Michelle was mad that Gore got the Sheriff's Department involved. I asked Gore  
18 why the phone number she gave me for Michelle had an Orlando area code. Gore told me that one  
19 of the cases against Warner was in Orlando. Gore said that she was now in contact with someone  
20 named "Elizabeth" who works for the FBI in Los Angeles. Gore told me she was also on a texting  
21 basis with the District Attorney. Gore said she and Wood were having Senators sign a letter to the  
22 Attorney General. A true and correct copy of the call log is attached hereto as **EXHIBIT H**.

23 23. On December 23, 2020, I received another voicemail from Bell, trying to reach  
24 Michelle Langer. A true and correct copy of the voicemail/missed call log for Bell is attached  
25 hereto as **EXHIBIT I**.

26 24. Bell's voicemail is as follows:

27 "Hi I'm looking for a Michelle Langer. Um I called yesterday. My name is  
28 Jamie Bell. I'm calling uh uh, strange call actually. I'm calling about um uh Evan

1 Rachel Wood and a case that is pertaining to her and her involvement uh within a  
2 case in terms of her being uh uh a material witness in something. Has to do with the  
3 uh custody of our child. Uh we share custody of him. His name is Jack Donovan  
4 Bell. I have a couple questions for you if you would not mind uh calling me back. I  
5 know it's close to the holidays um but uh as it does pertain to custody of child um  
6 and well-being of a child, I, I hope that you'll uh understand that it's some urgency.  
7 Um let me give you my number 323-460-[REDACTED]. I would really appreciate  
8 it um if you could get back to me uh as soon as possible. Thank you so much.  
9 Happy holidays. Hope you're well. Bye.”

10 25. Since Gore failed to fix the issue and provide Bell with the correct phone number  
11 for Michelle Langer and Bell sounded extremely concerned about the well-being of his child, I  
12 contacted Bell through text message and gave Bell the number for Michelle Langer's phone which  
13 Gore had provided to me. A true and correct copy of our messages are attached hereto as

14 **EXHIBIT J.**

15 26. I also messaged Gore through WhatsApp on December 23, 2020, stating “Jamie  
16 left another voicemail looking for Michelle Langer so I texted him Michelle's number and said our  
17 numbers must have been mixed up.” Gore responded “No problem so sorry about that mix up[.]”  
18 A true and correct copy of our messages are attached hereto as **EXHIBIT K.**

19 27. When I stated that “our numbers must have been mixed up,” my statement was  
20 solely based on Gore telling me “Someone got the numbers mixed up.” I did not have any  
21 independent or personal knowledge of what really happened to my phone number and why people  
22 were calling me thinking they were reaching Michelle Langer.

23 28. On December 6, 2021, I read an article about allegations Wood was making about  
24 Warner, posted online by Daily Mail at [https://www.dailymail.co.uk/news/article-](https://www.dailymail.co.uk/news/article-10259501/Marilyn-Manson-threatened-Evan-Rachel-Woodss-son-actress-claims.html)  
25 [10259501/Marilyn-Manson-threatened-Evan-Rachel-Woodss-son-actress-claims.html](https://www.dailymail.co.uk/news/article-10259501/Marilyn-Manson-threatened-Evan-Rachel-Woodss-son-actress-claims.html). The article  
26 contained three pages from Wood's declaration from her custody case which made me realize my  
27 phone number was used illegally by Gore and Wood. The three pages from Wood's declaration  
28 have an odd transparent copyright with the name of what appears to be the law firm that

1 represented Wood. A true and correct copy of the three pages from Wood's declaration that were  
2 posted online by the Daily Mail are attached hereto as **EXHIBIT L**.

3 29. On page 2 of Wood's declaration, in Section 7, Wood states "To punctuate the  
4 seriousness of the situation, I was provided with a correspondence from a representative of the  
5 Federal Violent Crimes Department from the FBI. A true and correct copy of this correspondence  
6 is attached as **Exhibit "A."** The foregoing individuals wrote..." Bell stated that he was "looking  
7 for Michelle Langer of the Federal Violent Crimes Department" in his December 22, 2020  
8 voicemail.

9 30. On page 2 of Wood's declaration, in Section 10, Wood mentions an email she sent  
10 Bell on December 22, 2020. She stated in the email to Bell "I will forward you my contact at the  
11 FBI and you should feel free to call him with whatever questions you have."

12 31. On January 26, 2022, an attorney from Tarlow and Berk called my phone number,  
13 asking to speak to Michelle Langer. I told her that I'm not Michelle Langer and asked her how  
14 she received my phone number. She informed me that my phone number was on a letter which  
15 states that it was authored and signed by Michelle Langer, but below Michelle Langer's name in  
16 the signature block, appears my phone number—the same phone number I used to communicate  
17 with Gore.

18 32. I never consented to Gore providing my phone number to anyone other than to  
19 Michelle Langer, who worked for the FBI according to Gore, and solely in connection with  
20 [REDACTED] stalking and harassment of me. I have never spoken to Michelle Langer. I had no  
21 involvement with drafting the letter and did not even see a copy of the letter until 2022. I did not  
22 ask or authorize Gore, Wood, or anyone else to use my phone number on or in connection with the  
23 letter or in any other manner.

24 33. Gore offered to help me by connecting me with the FBI regarding [REDACTED]  
25 stalking and harassment, but instead of helping me, Gore and Wood have caused me severe  
26 emotional distress by illegally using my phone number on a forged FBI letter, using the forged  
27 FBI letter, distributing the forged FBI letter, and subjecting me to a possible criminal  
28 investigation. I have no idea to what extent Gore and Wood illegally used my phone number,



1 since both Gore and Wood have failed to provide any details surrounding the forged FBI letter and  
2 illegal use of my phone number.

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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 17th day of October, 2022, at Los Angeles, California.

*Michele Meyer*

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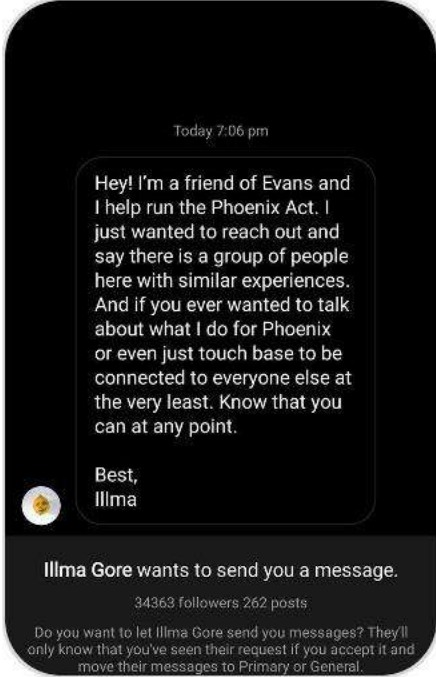
Michele Meyer

# **EXHIBIT A**



11:06 AM

WTF



We're going to talk on zoom

Omg that was a lot of information, could call you at some point to fill you in



Double tap to like

19:06



**Illma Gore**

illmagore



Today 7:06 pm

Hey! I'm a friend of Evans and I help run the Phoenix Act. I just wanted to reach out and say there is a group of people here with similar experiences. And if 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



**Illma Gore** wants to send you a message.

34363 followers 262 posts

Do you want to let Illma Gore send you messages? They'll only know that you've seen their request if you accept it and move their messages to Primary or General.

**Block**

**Delete**

**Accept**



# **EXHIBIT B**



**Illma Gore**

illmagore



October 01, 8:05 PM

Hi Illma - My friend [REDACTED] said she spoke to you. We are both being harassed by [REDACTED] [REDACTED] He obtained our personal information from [REDACTED] [REDACTED] is using my information to commit identity theft, harasss and abuse me. He created hate pages about us and came to my home in [REDACTED] to take photos and posted them online along with death threats. As you can see from my page, it's a complete nightmare. I filed a police report but until I'm murdered, there is nothing police will do about [REDACTED] suggested that I contact you since you said that there were other victims. I don't use my name on my page because I'm an attorney (sadly I don't practice



Message...





**Illma Gore**

illmagore



criminal law), but if there are other victims and if there is any way to stop this harassment, please let me know.

Thanks  
Michele Meyer

I'm licensed in CA, MA and NY and can be reached at my number 949-202- [REDACTED] which is posted on the MA board site (CA & NY do not require a number to be posted publicly).

October 03, 8:43 PM

Thank you so much for taking the time to speak to me. I really appreciate your help to get me in contact with the FBI so [REDACTED] harassment can be stopped.

Here's the podcast with Aussie I



Message...



# **EXHIBIT C**



< Recents

Edit



Illma Gore



message



call



WhatsApp



mail

October 2, 2020

11:15 AM Incoming Call

1 hour

11:02 AM Incoming Call

48 minutes

13 minutes

phone RECENT

+1 (310) 425- [REDACTED]

Notes

Send Message

Share Contact

Add to Favorites



Favorites



Recents



Contacts



Keypad



Voicemail

< Recents

Edit



Illma Gore



message



call



WhatsApp



mail

October 5, 2020

7:59 PM Incoming Call

1 hour  
15 minutes

phone RECENT

+1 (310) 425- [REDACTED]

Notes

Send Message

Share Contact

Add to Favorites



Favorites



Recents



Contacts



Keypad



Voicemail

< Recents

Edit



Ilma Gore



message



call



WhatsApp



mail

October 7, 2020

4:01 PM Incoming Call

3 hours  
2 minutes

phone RECENT

+1 (310) 425- [REDACTED]

Notes

Send Message

Share Contact

Add to Favorites



Favorites



Recents



Contacts



Keypad



Voicemail

# **EXHIBIT D**

Oct 14, 2020



Michelle



9:25 PM

[Invite to WhatsApp](#)

Hey! This is the contact to the investigation for you to leave a message. She will direct you to the right person

9:26 PM

She probably won't answer but leave a message

9:26 PM

Hope you haven't been spammed too much lately

9:26 PM

Thanks! I will call her tomorrow and leave a



Message input field



**Michelle**

FBI Sex Crimes

[Create New Contact](#)

[Add to Existing Contact](#)

Phone

(407) 714- [REDACTED]

# **EXHIBIT E**

< Voicemail



(323) 397- [REDACTED]

Los Angeles, CA



message



call



WhatsApp



mail

December 22, 2020

10:42 AM Missed Call

[Share Contact](#)

[Share My Location](#)

[Create New Contact](#)

[Add to Existing Contact](#)



Favorites



Recents



Contacts



Keypad



Voicemail



< Voicemail



(323) 397- [REDACTED]

Los Angeles, CA



message



call



WhatsApp



mail

December 22, 2020

10:45 AM Missed Call

Share Contact

Share My Location

Create New Contact

Add to Existing Contact



Favorites



Recents



Contacts



Keypad



Voicemail

# **EXHIBIT F**

< Voicemail



(323) 460- [REDACTED]

Los Angeles, CA



message



call



WhatsApp



mail

December 22, 2020

10:45 AM Missed Call

Share Contact

Share My Location

Create New Contact

Add to Existing Contact



Favorites



Recents



Contacts



Keypad



Voicemail

# **EXHIBIT G**

Dec 22, 2020

I just received 2 voicemails on my cell just now looking for Michelle Langer. Shawn Holley called saying she represents Evan and Jamie Bell called saying he's the father of Jack Bell. I haven't returned the calls to tell them they have the wrong person. Do you want me to call them or can you and Evan sort it out on your end?

10:59 AM ✓✓

Don't respond I'll have it fixed immdelty

11:31 AM

Sorry for that. Someone got the numbers mixed up

11:31 AM

Thanks! 11:31 AM ✓✓

Thanks for reaching out. I also spoke to fbi recently

11:32 AM

I have some updates for you when you're free to talk

11:32 AM

I'm free 11:32 AM ✓✓

Are you free in an hour? Sorry got caught up

2:44 PM

I'm free in an hour 2:44 PM ✓✓

Cool talk then 2:45 PM

I'm going to call from [661 857](#) [REDACTED]

3:52 PM



[Text input field]



# **EXHIBIT H**

< Recents

Edit



Illma Gore 2



message



call



WhatsApp



mail

December 22, 2020

3:52 PM Incoming Call

27 minutes

phone RECENT

+1 (661) 857- [REDACTED]

Notes

Send Message

Share Contact

Add to Favorites



Favorites



Recents



Contacts



Keypad



Voicemail



# **EXHIBIT I**

< Voicemail



(323) 460- [REDACTED]

Los Angeles, CA



message



call



WhatsApp



mail

December 23, 2020

10:14 AM Missed Call

Share Contact

Share My Location

Create New Contact

Add to Existing Contact



Favorites



Recents



Contacts



Keypad



Voicemail

# **EXHIBIT J**



(917) 216-██████████

iMessage

Dec 23, 2020, 4:13 PM

I received your voicemails for Michelle Langer. I think Evan mixed up my number with Michelle Langer's because we have the same first name. I spoke to Ilma about the mix up the other day, but since it appears no one has contacted you, here's Michelle Langer's number. I've called the number so it's correct.



Michelle Langer



message



call



WhatsApp



mail

main

1 (407) 714-██████████

Notes

Send Message

Share Contact



iMessage





(917) 216-██████████

appears no one has contacted you, here's Michelle Langer's number. I've called the number so it's correct.



Michelle Langer



message



call



WhatsApp



mail

main

1 (407) 714-██████████

Notes

Send Message

Share Contact

Add to Favorites

Share My Location

My apologies. It was the number I was given. Thank you for letting me know, you are correct, I had no idea and no one had corrected me. Appreciate it.



iMessage





(917) 216-██████████

I'm so sorry I didn't contact you sooner. I keep this phone off during the work day. Michelle never returned my calls from 2 months ago, but I hope you have better luck than I did.

Oh boy. Really hope I get in touch with her sooner.

In case you can't get in touch with her, I contacted her about a cyberstalking case and she is working on a human/sex trafficking case. I don't know how it would affect your child or if there is another case she is working on. Feel free to call me if you want the info I have.

I feel awful that I didn't get in touch with you sooner since you seemed very concerned.

Delivered

Have left word with her. Will sit tight and wait. Thank you tho



iMessage







(917) 216-██████████

never returned my calls from 2 months ago, but I hope you have better luck than I did.

Oh boy. Really hope I get in touch with her sooner.

In case you can't get in touch with her, I contacted her about a cyberstalking case and she is working on a human/sex trafficking case. I don't know how it would affect your child or if there is another case she is working on. Feel free to call me if you want the info I have.

I feel awful that I didn't get in touch with you sooner since you seemed very concerned.

Delivered

Have left word with her. Will sit tight and wait. Thank you tho. It's ok, hopefully on the right track now. Appreciate you getting in touch. Thank you



iMessage



# **EXHIBIT K**





Dec 23, 2020

Jamie left another voicemail looking for Michelle Langer so I texted him Michelle's number and said our numbers must have been mixed up.

9:00 PM ✓✓

No problem so sorry about that mix up

9:06 PM

No problem. I didn't hear from Shawn again so hopefully she has Michelle's number.

9:08 PM ✓✓



# **EXHIBIT L**

DECLARATION OF EVAN RACHEL WOOD

I, EVAN RACHEL WOOD, declare as follows:

1. I am the Respondent to this *ex parte* application. I am specially appearing to respond to Petitioner Andrew James Matfin-Bell's ("Jamie") *ex parte* application and nothing herein should be construed and my consent to this Court's jurisdiction in this proceeding. I have personal knowledge of the facts set forth in this declaration, except as to those facts known to me on information and belief, and if called as a witness, I could and would competently testify to the within facts.

2. I respectfully request that the Court deny Jamie's requests on the basis that (1) there is no emergency warranting *ex parte* relief; (2) this Court lacks jurisdiction; and (3) Tennessee is a safer, more appropriate forum for this action. To the extent the Court is inclined to issue custody orders, I request that the minor child remain in Tennessee and all visitation occur in Tennessee under reasonable security protocols.

3. I am an actress and I have been working professionally since I was 5 years of age. In addition to my work in film, I am the founder of the Phoenix Act (the legislation that redefined domestic abuse to include coercive control).

4. I am a key witness in pending a criminal investigation. In connection with the investigation, I allege that I was the victim of torture, rape, and pedophilic grooming by an internationally-known public figure (hereinafter "alleged offender"). I am not the only woman who has alleged the foregoing criminal conduct and I personally know of many other women who have advanced allegations against the same individual.

5. I am extremely afraid of the alleged offender. I have suffered severe, traumatic physical and emotional injury at his hands, and I am afraid that he will seek retribution against me for testifying by harming me, our son, and members of our family.

6. Due the seriousness of the allegations, the potential danger to me as a key complaining witness, and the inevitability that the criminal investigation would become public knowledge, I was advised by criminal investigators that my and my family's safety was at risk.

7. To punctuate the seriousness of the situation, I was provided with a correspondence from a representative of the Federal Violent Crimes Department from the FBI. A true and correct copy of this correspondence is attached as **Exhibit "A."** The foregoing individuals wrote:

"Please be advised that Ms. Evan Rachel Wood is a key witness in connection with a criminal investigation in Los Angeles, California involving an international and well known public figure. The safety of Ms. Wood, her family, other victims, and of their families are of the utmost concern during this time. Contact for more information regarding the safety of victims Human and Sex Trafficking crimes." *[Emphasis added.]*

8. I have had a home in Tennessee since 2016. My Tennessee Residence is in the name of a trust for purposes of confidentiality and safety. The investigators made clear to me that our son could easily be targeted by the alleged offender – who is Los Angeles based – and who is not in custody at this time.

9. Approximately four months ago, in late November 2020, I made the decision to exclusively reside in the Tennessee home. At no time did I conceal from Jamie our whereabouts. During this time, however, Jamie was filming a movie in New Mexico and did not visit us.

10. On December 22, 2020, I was finally in the position to tell Jamie about the criminal investigation. I sent him an email, a true and correct copy of which is attached as **Exhibit "B."** I wrote:

"...Jack and I will be staying in Nashville for the immediate future. As you will soon find out, I am a material witness in a high profile criminal investigation which likely will be public in the near future. I have been advised that both Jack and my safety is at risk and that it is in our best interests to remain in Nashville. I will forward you my contact at the FBI and you should feel free to call him with whatever questions you have. I know how difficult this is for you to be away from Jack for an extended period of time. I will do whatever I can to accommodate you should you want to come here and visit him whenever you want. I of course will facilitate Facetime with Jack on a frequent basis. I am available to answer any questions you may have. Thank you for your understanding during this very difficult time."

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1 11. Despite my offers for Jamie to see our son in Tennessee, Jamie did not travel  
2 to Tennessee to visit our son in December 2020, January 2021, or February 2021.

3 12. When I sent Jamie the email on December 22, 2020, there was no paternity  
4 action pending in any court of law. Jamie had previously filed Paternity Case Number  
5 BF059003 in April of 2017, however he dismissed that action on or about in January 2020,  
6 leaving no action pending for over a year when the majority of these events occurred.

7 13. Thereafter, on February 26, 2021, I filed a Paternity Action in Tennessee  
8 and served Jamie that same day. Attached as **Exhibit "C"** is a true and correct copy of  
9 the action I filed in Tennessee.

10 14. As far as I knew, there was no paternity action filed in California at that time  
11 that I filed my action in Tennessee because Jamie never told me or served me with  
12 anything. Unbeknownst to me, however, Jamie re-filed a Paternity Petition in Los Angeles  
13 Superior Court on January 29, 2021, along with a Request for Order Regarding Child  
14 Custody. However, Jamie did not allegedly serve his Petition and Request for Order until  
15 February 26, 2021, the same day that I served Jamie with my Tennessee  
16 Petition. Attached as **Exhibit "D"** is a true and correct copy of the proof of service of the  
17 action I filed in Tennessee.

18 15. I am very familiar with the alleged offender in the criminal case for which I  
19 am a key witness, and I believe he presents an imminent risk of harm to me and the  
20 people I love, including our son, in particular in the Los Angeles/Hollywood area. I believe  
21 that me and our son are significantly safer in Tennessee where we are far away from the  
22 alleged offender, active criminal case, the alleged offender's network of fanatic supporters,  
23 and the paparazzi. Given the scope of this situation, my ability to function and maintain  
24 safety in a long-term living situation in Los Angeles is untenable.

25 16. Jamie is a successful actor with access to a private jet to facilitate visits  
26 with our son in Tennessee at any time. All I ask is that Jamie and I come to some sort  
27 agreement regarding safety for our son. Because I am the one who experienced of abuse,  
28 I can appreciate how serious the threat is, even if Jamie chooses not to believe me.

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**PROOF OF SERVICE**

**Brian Warner p/k/a Marilyn Manson v. Evelyn Rachel Wood, et al.  
Case No. 22STCV07568**

**STATE OF CALIFORNIA, COUNTY OF LOS ANGELES**

At the time of service, I was over 18 years of age and not a party to this action. I am 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.

On November 15, 2022, I served true copies of the following document(s) described as **DECLARATION OF MICHELE MEYER** on the interested parties in this action as follows:

**SEE ATTACHED SERVICE LIST**

**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 e-mail addresses listed in the Service List.

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

Executed on November 15, 2022, at Los Angeles, California.

*/s/ Eniko Weinberger*  
\_\_\_\_\_  
Eniko Weinberger

