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9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
10 **COUNTY OF LOS ANGELES, CENTRAL DISTRICT**

11 BRIAN WARNER, p/k/a MARILYN  
12 MANSON,

13 Plaintiff,

14 v.

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

17 Defendants.

Case No. 22STCV07568

**DECLARATION OF PAUL ZENIEWICZ  
IN SUPPORT OF DEFENDANT ASHLEY  
GORE'S REPLY TO OPPOSITION OF  
ANTI-SLAPP MOTION**

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

Action Filed: March 2, 2022

1 I, Paul Zeniewicz, hereby declares as follows:

2 1. I am an attorney, licensed to practice in the State of Florida. I represented  
3 Illma (Ashley Gore) with respect to a dispute over property in her sister Bryton Gore's  
4 custody, including but not limited to a silver iPad.


5 2. In September and October 2021, I exchanged communications with Jill  
6 Goldsmith, who was Bryton Gore's attorney at the time, concerning Illma Gore's silver  
7 iPad. On or about October 8, 2021, Ms. Goldsmith sent an email acknowledging that the  
8 silver iPad was in Bryton Gore's possession, a true and correct copy of which is attached  
9 hereto as **Exhibit A**.

10 3. On March 18, 2022, I sent another letter to Ms. Goldsmith and to Bryton  
11 Gore, again demanding return of Ashley Gore's silver iPad, which was not included in the  
12 boxes of Illma Gore's belongs provided in late 2021. A true and correct copy of my letter  
13 is attached hereto as **Exhibit B**.

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

16 Executed this 18th of November, 2022 in Orlando, Florida.

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DocuSigned by:  
  
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Paul Zeniewicz

# **EXHIBIT A**



**PZ Law Firm, P.A.**

*Lawsuits are difficult. Your law firm shouldn't be.*

September 30, 2021

**To: Jill Goldsmith**  
**4017 SW Altadena Ave**  
**Portland, OR 97239**  
**Sent via USPS Certified and via electronic mail to:**  
**[jill@workplacesolutionsnw.com](mailto:jill@workplacesolutionsnw.com)**

**Re: Letter to Ashley Illma Gore dated September 23, 2021**

Ms. Goldsmith:

My firm has the pleasure of representing Ashley Illma Gore in relation to the above-referenced communication sent and dated September 23, 2021. Please direct all future communications regarding the issues outlined in this letter to my attention. Any direct communications with my client will be interpreted as a threat.

Prior to pointing out the gross inaccuracies of your letter, I would ask you to remember that my client went to Australia (in March 2021) to rescue her mentally ill twin sister and her two beautiful children. My client unconditionally LOVES those children. With that said, your correspondence is loaded with baseless inaccuracies, fabrications, and half-truths. The tone and language contained within your letter is disheartening, unfortunate, and **heart-breaking** my client.

It is my understanding that you are a licensed attorney in Oregon. You, personally, had numerous opportunities to prepare contractual and financial agreements to define the duties, expectations, and obligations of the parties involved in this dispute. You, personally, chose to rely on handshakes and promises, instead of personally preparing binding contracts. Instead, my client had to retain counsel to simply address the misunderstanding(s) that you have labeled malfeasance.

Notwithstanding, the following letter shall address each of your allegations individually and separately:

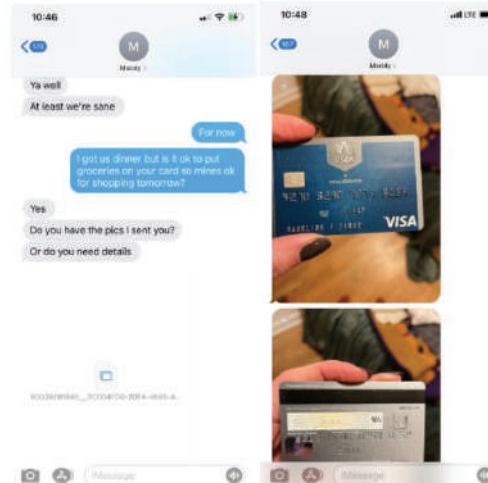
- Your unsubstantiated claim(s) of credit card fraud against Madeline are unfounded, slanderous, hurtful, and NOT based in fact. Specifically, see the following text message(s) between my client and Madeline:

**(Continued...)**



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As you can see in the text message(s) above, Madeline provided my client with **express** authorization to utilize her credit card. Moreover, you should be aware that my client and Madeline were sharing a Google spreadsheet of ongoing expenditures related to her credit card use. I am happy to provide you with a copy, though I suspect that you are in possession of same.

- Your unsubstantiated claim(s) of elder abuse and fraud are unfounded, slanderous, hurtful, and NOT based in fact. Importantly, your naked assertions of elder abuse are completely without merit. Additionally, your claim of fraud against Ursula relies on half-truths, misstatements of fact, and complete fabrications. To be clear, your “belief(s)” are better left for church than a baseless letter accusing a family member of fraud.
- Your unsubstantiated claim(s) of fraud on Bryton’s children’ school are unfounded, slanderous, hurtful, and NOT based in fact. First, please find the following email(s):





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My client contacted the school administrator and Bryton via email on September 16<sup>th</sup> and again on September 21<sup>st</sup>, specifically attempting to set-up automatic payments related to the children's tuition at school. Regardless, my client is still in possession of the tuition funds. Please immediately provide your preferred method of payment for the above undisputed amount of \$1,750.00 – based upon a split of the down-payment and monthly cost for two children.

- Your unsubstantiated claim(s) of identity theft against Bryton are unfounded, slanderous, hurtful, and NOT based in fact. To be crystal clear, my client has NEVER done anything but LOVE and CARE for her identical twin sister. She has NEVER opened *any* accounts under Bryton's name without Bryton's express consent. The remainder of this accusation is baseless.
- Your unsubstantiated claim(s) of identity theft against my client's deceased Mother are **DISGUSTING**, absurd, unfounded, slanderous, hurtful, and NOT based in fact. To be crystal, this naked assertion (unsupported by ANY facts) serves no other purpose but to harass, annoy, frustrate, hurt, and/or manipulate. Going forward, my client will NOT address any other allegations involving her deceased Mother without at least a sliver of viable information supporting such a disgusting assertion.

It's important to note that your letter states (multiple times) that she is NOT to have any communication with the parties notated in the opening paragraph. Then you later to state that various items should be returned to 333 White Road, Watsonville, CA 95076, by September 30, 2021. Your unreasonable request(s) are noted. However, sending demands for the return of items requires my client to communicate in order to return said items.

Accordingly, my client is in the possession and/or has control of and/or knows the whereabouts of the following items:

1. Mac Book Pro;
2. Mac Book Pro (broken);
3. Ipad Pro.

The working Mac Book Pro was in my client's possession until earlier this afternoon. This computer was shipped via FedEx. Feel free to use tracking # 284385730545 to locate the computer's current location. As of this afternoon, the expected delivery date of the computer is October 7, 2021.

The other two items remain items are presently located at the White Road address – contained within packing boxes. Ms. Gore consents to allowing Madeline to go through packing boxes to



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regain possession of solely those two specific items. The aforementioned consent is solely limited to Madeline. No other person (specifically you, Bryton or any other party named in your letter and/or acting your control) has authority to go through any boxes located at White Road address. Any additional authority regarding my client's personal property should be obtained with the express, written agreement of the undersigned law firm.

Your baseless repetition of words such as "threat" and "fraud", without any viable support/evidence, serves no other purpose but to bully, threaten, and harass my client. To be crystal, Ms. Gore agrees that she and Madeline agreed to split the cost of the Bryton's children through their transition into adulthood.

To assist us in attempting to obtain an actual agreement of the parties, my client respectfully demands the following from you:

1. Immediately send my office a complete accounting of any monies purportedly owed by client. Ms. Gore is inclined to pay any monies that she actually owes to you and/or the family representatives related to the incurred children's costs.
2. Provide my office with any written contracts and/or recorded conversations with my client wherein she agreed to return any monies/items previously provided, gifted to her – other than the three items listed above.
3. Provide my office with a detailed explanation of any purported instances of fraud against anyone (including, but not limited to, your allegations of credit card fraud, fraud on Bryton Gore's children's school, or any other purported claims of fraud against my client).
4. IMMEDIATELY cease and desist from any slanderous and/or vicious and/or hurtful and/or baseless or similar commentary about my client (written, oral, or other) unless and until you provide **any** information that substantiates any wrongdoing (at all) by my client, Ms. Gore.

Unlike *your* letter, this correspondence is my client's legitimate attempt to resolve any issues regarding the future health, safety and well-being of Bryton's children. This has been my client's intent since she trekked to Australia in March of this year. Please recall that it was always my client's intention to remove her sister's children from a terrible situation overseas. Importantly, it's imperative to point out that prior to your letter, **my client has NEVER been accused, charged, and/or convicted of any crimes of dishonesty or moral turpitude.** Stated succinctly, your hurtful and slanderous commentary is NOT in the interests of the children. Period.



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With all of that said, my client seeks compromise and closure from you, her accusers. More importantly, my client seeks the same the same thing today that she sought in March (2021). Ms. Gore seeks the ongoing best interest of her sister and sister's children. It has NEVER been my client's intention to mislead you, Madeline, or any of the other parties named in your correspondence. Her express intention has always been the children and preserving ties with family members.

Through my office, my client is happy to discuss an amicable resolution. However, such a resolution relies in a foundation based in facts, NOT accusations. Additionally, my client is entirely agreeable to providing any and off the documents, text messages, and/or similar communication(s) to you in a good-faith effort to help you understand her actions throughout the past year and a half. With all of that said, my client refuses to engage in a baseless name-calling match, where you've (apparently) decided to throw out the professional conduct rulebook and sling and slanderous commentary.

Regardless, I look forward to your prompt response to this very important communication. I will assume that you have substantiated my client's timeline of events (above) if I do NOT hear from you within seven (7) days of this correspondence.

Regards,

*/s/ Paul Zeniewicz*

Paul T. Zeniewicz, Esq.



# **EXHIBIT B**



**PZ Law Firm, P.A.**

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March 18, 2022

**To:** Madeline Dinse [madelinedinse3@gmail.com](mailto:madelinedinse3@gmail.com)  
Bryton Gore [brytonblue6@gmail.com](mailto:brytonblue6@gmail.com)  
Jill Goldsmith [jill@worplacesolutionsnw.com](mailto:jill@worplacesolutionsnw.com)

**Re:** Personal Items in YOUR Possession

To Whom It May Concern:

The following correspondence is my **FINAL** demand for the immediate return of the following personal items that belong to my client, Illma Gore:

- *Silver iPad Pro*
- *Mac Mini*
- *Birth Abroad Certificate*
- *Australian Birth Certificate*
- *Any other ID contained within the suitcase where all of the family's ID was kept*

My office has made it abundantly clear that you were to get express written permission in regard to my client's property. If there is no response to this letter, all legal options will be explored, including, but not limited to, legal proceedings necessary to recover the property. My client will seek payment of all of my firm's attorney's fees and costs.

Pursuant communications with the Sheriff's Department, the items shall be returned via civil standby – meaning a proxy of my client will meet the Sherriff and your representative to return my client's personal items. You contact Detective Van Dyke at (213) 265-0708 if you have any specific questions. I appreciate your prompt attention to this very important and time-sensitive information. Please contact me directly if you have any questions.

Regards,

*Paul Zeniewicz*

Paul T. Zeniewicz, Esq.  
[paulz@pzlawfirm.com](mailto:paulz@pzlawfirm.com)