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7 RECORDS, INC.

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10 UNITED STATES DISTRICT COURT
11 CENTRAL DISTRICT OF CALIFORNIA
12 WESTERN DIVISION

13 ESMÉ BIANCO,
14 Plaintiff,
15 vs.

16 BRIAN WARNER a/k/a MARILYN
17 MANSON, individually; MARILYN
MANSON RECORDS, INC.,
18 Defendants.
19

CASE NO. 2:21-CV-3677-FLA-MAR

**DECLARATION OF HOWARD E.
KING IN SUPPORT
DEFENDANTS' MOTION TO STAY
PROCEEDINGS PURSUANT TO 18
U.S.C. § 1595(b)**

*Notice of Motion and Motion,
Memorandum of Points and Authorities,
Declaration of Blair Berk, and
Proposed Order filed concurrently*

Date: January 13, 2023
Time: 1:30 p.m.
Crtrm.: 6B

The Hon. Fernando L. Aenlle-Rocha

SAC Filed: May 12, 2022
Trial Date: June 20, 2023

DECLARATION OF HOWARD E. KING

I, Howard E. King, declare as follows:

1. I am an active member in good standing of the State Bar of California and have been admitted to practice before this Court. I am a partner with King, Holmes, Paterno & Soriano, LLP, counsel of record for Defendants Brian Warner and Marilyn Manson Records, Inc. (“Defendants”) in this action. I have personal knowledge of the facts set forth herein, which are known by me to be true and correct, and if called as a witness, I could and would competently testify thereto.

2. Attached hereto as **Exhibit 1** is a true and correct copy of an article published by the Los Angeles Times on November 30, 2021, titled “Sheriff’s deputies search Marilyn Manson’s home in abuse investigation,” which is available at <https://www.latimes.com/california/story/2021-11-30/marilyn-manson-home-searched-abuse-investigation> (last visited December 6, 2022).

3. Attached hereto as **Exhibit 2** is a true and correct copy of an article published by the Los Angeles Times on September 20, 2022, titled “Marilyn Manson sexual abuse investigation turned over to Los Angeles County D.A.,” which is available at <https://www.latimes.com/california/story/2022-09-20/marilyn-manson-sexual-abuse-investigation-george-gascon> (last visited December 6, 2022).

4. Attached hereto as **Exhibit 3** is a true and correct copy of a “Statement on Sexual Assault Allegations involving Brian Warner, aka Marilyn Manson” that Los Angeles District Attorney George Gascón published from his official Twitter account on September 20, 2022, and which is available at <https://twitter.com/LADAOoffice/status/1572312992997593088> (last visited December 6, 2022).

5. As part of my representation of Defendants in this case, I have had numerous conversations with Plaintiff Esmé Bianco’s attorney Jay Ellwanger. During those conversations, Mr. Ellwanger informed me that he and Ms. Bianco met with investigators from the Los Angeles County Sheriff’s Department and that Ms.

1 Bianco reported her allegations about Mr. Warner to them.

2 Executed on this 15 day of December, 2022, at Los Angeles, California.

3 I declare under penalty of perjury that the foregoing is true and correct.

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/s/ Howard E. King

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Howard E. King

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EXHIBIT 1



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CALIFORNIA

Sheriff's deputies search Marilyn Manson's home in abuse investigation



Marilyn Manson attends the 9th annual "Home for the Holidays" benefit concert in Los Angeles in December 2019. (Richard Shotwell / Invision)

BY ANDREW DALTON | ASSOCIATED PRESS

NOV. 30, 2021 2:31 AM PT



Sheriff's deputies searched the home of rocker Marilyn Manson on Monday after allegations of physical and sexual abuse by several women.

Los Angeles County Sheriff's Deputy Eva Jimenez said a search warrant was served on the home of Manson, whose legal name is Brian Hugh Warner. She gave no further details.

The Sheriff's Department said in February that its detectives had begun [investigating Manson over reports of domestic violence](#) between 2009 and 2011 in West Hollywood,

where he lived at the time.

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The women involved were not identified, but [several women have publicly alleged](#) this year that they were physically, sexually and emotionally abused by Manson around the time of the incidents under investigation, and some have filed lawsuits.

Manson’s attorney Howard E. King declined immediate comment. Manson has denied the allegations, and King has called them “provably false.”

The search of Manson’s home was first reported by TMZ.



MUSIC

Marilyn Manson’s accusers detail his alleged abuse. ‘He’s so much worse than his persona’

Nov. 5, 2021

The 52-year-old shock rocker’s former fiancée, “Westworld” actor Evan Rachel Wood, named him as her abuser for the first time in an Instagram post in February.

Manson called Wood’s statements “horrible distortions of reality.”

In May, “Game of Thrones” actor Esmé Bianco sued Manson in federal court, [alleging sexual, physical and emotional abuse](#). Bianco says that Manson violated human-trafficking laws by bringing her to California from England for non-existent roles in music videos and movies.

Manson deprived Bianco of food and sleep, locked her in a bedroom, whipped her, gave her electric shocks and threatened to enter her room and rape her during the night, the lawsuit alleges.



MUSIC

Judge denies Marilyn Manson’s motion to dismiss Esmé Bianco suit

Oct. 7, 2021

Bianco’s attorney said she also was interviewed by law enforcement.

And Manson’s [former assistant accused him of sexual assault](#), battery and harassment in her own lawsuit, saying he used “his position of power, celebrity and connections to exploit and victimize during her employment.”

Manson emerged as a musical star in the mid-1990s, known as much for courting public controversy as for hit songs such as “The Beautiful People” and hit albums such as 1996’s “Antichrist Superstar” and 1998’s “Mechanical Animals.”

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Marilyn Manson sexual abuse investigation turned over to Los Angeles County D.A.



Marilyn Manson arrives at the Vanity Fair Oscar Party in Beverly Hills on Feb. 9, 2020. (Evan Agostini / Invision / Associated Press)

BY RICHARD WINTON | STAFF WRITER

SEPT. 20, 2022 10:33 AM PT



A 19-month sexual abuse investigation into Marilyn Manson by the Los Angeles County Sheriff’s Department has been sent to Dist. Atty. George Gascón for a decision on whether to file criminal charges against the singer.

The Sheriff’s Department’s Special Victims Bureau, which handles sexual and physical abuse investigations, submitted its extensive investigation into the performer, whose real name is Brian Warner, on Monday for filing consideration. A search warrant [was served at his home](#) in November.

“The incidents occurred between 2009 and 2011 when Mr. Warner lived in the city of West Hollywood,” sheriff’s investigators revealed initially last year. Multiple women have accused Manson of sexual and physical abuse. He has repeatedly denied the allegations. The statute of limitations for rape in California is 10 years, so any charges may depend on the type of offense and how long ago it happened.

“Once we have received the case, it will be carefully evaluated by experienced prosecutors to determine if it is appropriate to file charges at this time,” Gascón said last week. “The district attorney is committed to investing in trauma-informed care for all victims of sexual assault, abuse, and intimate partner violence. We understand how difficult it may be to come forward as a victim, especially when the case involves this level of notoriety, and are dedicated to treating all victims with the highest level of care and respect.”

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TELEVISION

Evan Rachel Wood says she’s ‘steady as a rock’ in face of Marilyn Manson’s lawsuit

March 15, 2022

Evan Rachel Wood, star of HBO’s “Westworld,” was in a relationship with Manson during the time of the allegations. She became engaged to the singer in 2010 before

splitting. Last year, Wood and several other women [publicly accused Manson of abuse](#).

“He started grooming me when I was a teenager and horrifically abused me for years,” Wood wrote in messages posted to Instagram. “I was brainwashed and manipulated into submission. I am done living in fear of retaliation, slander, or blackmail.”

In 2018, as the #MeToo movement rose, Wood testified to a congressional committee about the horrific abuse she suffered at the hands of an unnamed former partner.

Manson has denied the allegations but was dropped by his record label as the number of allegations grew. In March, he [sued Wood](#) and artist Illma Gore in L.A. County Superior Court, accusing them of defamation, fraud and conspiracy.



ENTERTAINMENT & ARTS

‘I’m having a bad week’: Aries Spears brushes off child sexual abuse allegations

Sept. 9, 2022

Manson also faces a federal lawsuit in Los Angeles alleging sexual assault and battery and human trafficking. The suit was filed last year by actor Esmé Bianco.

Bianco alleges that she was raped and subjected to sleep deprivation and forced labor after Manson offered to help her obtain a work visa.

Manson’s rise to fame occurred in the mid-1990s, built partly on an extreme stage persona that courted controversy and spawned albums such as “Antichrist Superstar” in 1996.

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Richard Winton

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Richard Winton is an investigative crime writer for the Los Angeles Times and part of the team that won the Pulitzer Prize for public service in 2011. Known as @lacrimex on Twitter, during almost 30 years at The Times he also has been part of the breaking news staff that won Pulitzers in 1998, 2004 and 2016.

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EXHIBIT 3



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George Gascón @LADAOoffice

Statement on Sexual Assault Allegations Involving Brian Warner, aka Marilyn Manson:

On September 19, 2022, investigators from the Los Angeles County Sheriff's Department provided partial case material to LADA pertaining to the sexual assault allegations against Brian Warner,

STATEMENT ON SEXUAL ASSAULT ALLEGATIONS INVOLVING BRIAN WARNER, AKA MARILYN MANSON

On September 19, 2022, investigators from the Los Angeles County Sheriff's Department provided partial case material to LADA pertaining to the sexual assault allegations against Brian Warner, also known as Marilyn Manson. There is more material that is still outstanding, however, we do not have a timeline for the additional submission from the LASD. Once we receive everything, experienced prosecutors will carefully and deliberately review everything that has been submitted prior to making a filing decision. This review will take some time but rest assured our office takes these allegations very seriously. LADA is dedicated to providing care and assistance to all victims of sexual assault, abuse and intimate partner violence.

ALT District Attorney George Gascon | <http://da.lacounty.gov> @LADAOoffice @LACountyDA

Los Angeles County

12:53 PM · Sep 20, 2022 from Los Angeles, CA

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George Gascón @LADAOoffice · Sep 20

Replying to @LADAOoffice

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George Gascón @LADAOoffice · Sep 20

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John Jon @jnuts6446 · Sep 20

Replying to @LADAOoffice and @CountyofLA



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