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DECLARATION OF ASHLEY LINDSAY MORGAN SMITHLINE

I, Ashley Lindsay Morgan Smithline, declares as follows:

1. In November 2010, I had a brief, consensual sexual relationship with Brian Warner, also known as Marilyn Manson, during a trip I took to Los Angeles from Thailand, where I was living.

2. Ten years later, I succumbed to pressure from Evan Rachel Wood and her associates to make accusations of rape and assault against Mr. Warner that were not true.

3. In 2020, I was contacted by either Ashley Walters or Illma Gore to participate in a group meeting of women who, they said, had relationships or experiences with Mr. Warner. (I knew Ms. Walters from my trip to Los Angeles in 2010. She was Mr. Warner’s assistant, and she arranged my travel. I also spent time with her during the trip.) Ultimately, I participated in at least one such group call and a meeting that was filmed in October 2020 (which I only later learned was for *Phoenix Rising*). From this time in 2020 through June 2021, I had many communications with Ms. Wood.

4. During my conversations with Ms. Wood, she described acts allegedly committed by Mr. Warner against Ms. Wood and other supposed victims and asked me whether the same things happened to me. I remember she asked me whether I had been, among other things, whipped, chained, tied up, branded/cut, assaulted while sleeping, beaten, or raped. She said all of these things happened to Ms. Wood and others, and that when Ms. Wood was with Mr. Warner every moment was a moment of survival. When I said, no this did not happen to me and this was not my experience, I recall being told by Ms. Wood that just because I could not remember did not necessarily mean that it did not happen.

5. While at first I knew Mr. Warner did not do these things to me, I eventually I began to question whether he actually did. On numerous occasions, I was told by Ms. Wood, Esme Bianco and others that these things happened to Ms. Wood and Ms. Bianco; asked whether the same things happened to me; and told that I may just be misremembering what happened, repressing my memories of what happened, or that my memories had not yet surfaced—which they said happened to people against whom these acts were perpetrated. I was asked whether I

1 was repressing memories to just get through day-to-day life, and whether it was easier just to not
2 think about what actually happened than accept reality. They also said it was important for people
3 to come forward so that no one else gets hurt.

4 6. I also recall that in one of the group meetings I attended with Ms. Wood and Ms.
5 Gore, Ms. Gore said they could arrange security for anyone who felt in danger from Mr. Warner. I
6 recall that Ms. Bianco said during this discussion that private investigators had been parked
7 outside of her house and probably were parked outside of mine. I also had separate conversations
8 with Ms. Bianco during this time period in which she told me her relationship with Mr. Warner
9 was similar to that described by Ms. Wood. She insisted that I was repressing memories like she
10 and other supposed victims of Mr. Warner had done.

11 7. Eventually, I started to believe that what I was repeatedly told happened to Ms.
12 Wood and Ms. Bianco also happened to me.

13 8. In or around January 2021, I attended a call on which Ms. Wood said that on a
14 certain day she would post to her social media naming Mr. Warner as her abuser, and that we all
15 should do the same on or around the same day. I discussed with Ms. Gore making such a
16 statement on my Instagram page accusing Mr. Warner of abuse. Ms. Gore drafted the statement,
17 and I gave her my password to post it. The narrative ultimately posted to my account on or around
18 February 1, 2021 contained untrue statements about Mr. Warner, including that there was violence
19 and non-consensual sexual activity in our brief relationship, and that I had repressed memories of
20 the same. As another example, there was no branding or cutting experienced during the brief
21 relationship and certainly no “Marilyn Manson” initials carved on my body.

22 9. On June 29, 2021, a complaint was filed in the lawsuit *Ashley Lindsay Morgan*
23 *Smithline v. Brian Warner et al.*, Case No. 2:21-cv-5289. The complaint was filed by my attorney
24 at the time, Jay Ellwanger. Ms. Bianco told me Mr. Ellwanger was her lawyer and that I should
25 use him. Mr. Ellwanger did not review the contents of the complaint with me before filing it and
26 did not send me a draft of the complaint to approve before filing it. The complaint contained
27 untrue statements about Mr. Warner, including that there was violence and non-consensual sexual
28 activity in our brief relationship, and that I had repressed memories of the same until meeting with

1 Ms. Wood, Ms. Gore, and others in 2020. Leading up to the filing of the complaint, I felt
2 pressured by Mr. Ellwanger to go on a press tour, which included an interview on The View and
3 an interview and photoshoot with People magazine. I was very uncomfortable doing this press but
4 felt pressured to do it.

5 10. After the lawsuit was filed on my behalf, I fired Mr. Ellwanger, and the case was
6 dismissed. I never received any money from Mr. Warner and am not seeking any money from
7 him. I have no intention of refileing any lawsuit against Mr. Warner.

8 11. I never intended to pursue criminal charges against Mr. Warner and have no
9 intention now of ever pursuing criminal charges, as Mr. Warner did not ever assault or abuse me.

10 12. Looking back, I feel I was manipulated by Ms. Wood, Ms. Gore, Ms. Bianco, and
11 Mr. Ellwanger to spread publicly false accusations of abuse against Mr. Warner.

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

14 Executed on this 19th day of February 2023, at Los Angeles County, CA.

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DocuSigned by:

ASHLEY LINDSAY MORGAN SMITHLINE