

1 DECLARATION OF WADE ROBSON

2 I, WADE ROBSON, declare and state, as follows:

3 1. I have personal knowledge of the facts stated herein, and if called as a witness I
4 would and could competently testify thereto, except for those matters and things set forth upon
5 information and belief, and as to those matters and things, I believe them to be true.

6 2. My name is Wade Jeremy William Robson. I am 30 years old and was born on
7 September 17, 1982 in Brisbane, Australia to parents Lynette Joy Robson and Leslie Dennis
8 Robson. I have a sister, named Chantal Robson, who is three (3) years older than me and a
9 brother named Shane Robson, who is approximately ten (10) years older than me.

10 3. Based upon the following set of facts and my understanding of the definition of the
11 word "just", I believe that my claim is just.

12 4. When I was two (2) years old, my mother showed me her video cassette of Doe 1's
13 "The Making of Thriller." I was instantly fascinated with it and watched the video every day and
14 emulated Doc 1's dance moves. Between the ages of two (2) and five (5), my fascination and
15 interest in Doe 1, specifically dancing and being like him, grew into an obsession. He became like
16 "God" to me.

17 5. When I was five (5) years old, my mother entered me in a Doe 1 dance-a-like
18 contest in Brisbane, Australia that was run by [REDACTED]. I won the competition and the prize was to
19 meet Doe 1. In November 1987, I met Doe 1 after one of his "Bad" tour concerts in Brisbane,
20 Australia. Doe 1 then invited me to dance onstage with him at another one of his Australian
21 concerts a few nights after our first meeting. As a five (5) year old, dancing with my idol Doe 1
22 was the biggest thing ever to happen to me. The day after our joint onstage performance, my
23 mother and I spent a few hours visiting with Doe 1 in his hotel suite.

24 6. In early 1990 when I was seven (7) years old, I traveled with the Johnny Young
25 Talent School located in Brisbane, Australia to perform at Disneyland. Several family members
26 traveled with me to America. During our stay in Los Angeles, I met Doe 1 at a recording studio in
27 Van Nuys, California. During our meeting, Doe 1 invited me and my whole family to spend the
28 weekend at his Santa Barbara County ranch, "Neverland Valley Ranch". My family stayed the

1 weekend at the ranch, but then left me alone with Doe 1 for another week. The first night at the
2 ranch my sister Chantal and I both slept in Doe 1's bedroom in the same bed as Doe 1. The
3 following night Chantal expressed concern about sleeping in Doe 1's bed and elected instead to
4 sleep in a separate bed on a different floor of Doe 1's two-floor bedroom, but I slept in Doe 1's
5 bed. Doe 1 began sexually abusing me on or about that night. The sexual abuse continued every
6 night through the nearly two (2) weeks that I spent at the ranch during that early 1990 visit as well
7 as at Doe 1's apartment in the Westwood section of Los Angeles before my family and I returned
8 to Australia. Paragraph 15 below describes the sexual abuse.

9 7. From the first instance of abuse, Doe 1 began telling me that "we can never tell
10 anyone what WE are doing. People are ignorant and they would never understand that we love
11 each other and this is how we show it. If anyone were to ever find out, OUR lives and careers
12 would be over." I swore I would never tell a soul about what we did, and did not until May 2012.

13 8. After I had been with Doe 1 for a week, my family returned to the ranch for the
14 weekend. Even while my family was at the ranch, I continued to sleep with Doe 1 in his bed in
15 his room, and the sexual abuse continued. After the week at the ranch, my mother, sister and I
16 stayed with Doe 1 for a number of days at Doe 1's apartment in the Westwood section of Los
17 Angeles. I stayed with Doe 1 in his bedroom and in the same bed at the apartment, and the sexual
18 abuse continued.

19 9. At some point during this 1990 trip to Los Angeles, Doe 1 gave me the nickname
20 "little one." He continued to call me by that name all the way up until his death in 2009. He also
21 began to fill my head with maxims to live by such as "Be in the history books" and "Immortalize
22 yourself." He also prophesized that I would one day be a film director bigger than Steven
23 Spielberg. As far as I was concerned, Doe 1 had written my fate.

24 10. My family and I returned to Australia following my two-week visit with Doe 1.
25 My mother and I remained in constant contact with Doe 1. During this period, Doe 1 and I would
26 frequently speak on the telephone for hours each week. We also would constantly send faxes back
27 and forth to each other.

28 ///

2 [REDACTED]
3 [REDACTED]
4 [REDACTED]
5 [REDACTED]
6 [REDACTED]
7 [REDACTED]
8 [REDACTED]

9 16. The most distressing thing for me is [REDACTED]
10 [REDACTED]

11 [REDACTED] My life has been a lie. Until recently as described below, I
12 did not believe that I was sexually abused. I swore to Doe 1 that I would go to the grave and
13 never tell anyone what we did.

14 17. In September 1993, a sexual abuse lawsuit was brought against Doe 1 by a young
15 boy named Jordy Chandler. I was subpoenaed to testify in front of a Grand Jury in Los Angeles in
16 an criminal investigation relating to the boy's relationship with Doe 1. At the time, I was only
17 eleven (11) years old. As soon as I was subpoenaed for my testimony, Doe 1 started calling me
18 every day to coach me. He would tell me that our phones were tapped and "they" were listening
19 to everything we said. He would role play with me and say to me, "They are saying we did all of
20 this disgusting sexual stuff. We never did any of that, right?" I would play along and answer, "No
21 way!" He would say, "If they believed that we did any of this sexual stuff, YOU AND I would go
22 to jail for the rest of our lives. Our lives and careers would be over. We've got to fight this. We've
23 got to beat them together." Doe 1 selected, hired and paid for the lawyer representing me in
24 relation to my Grand Jury subpoena. My mother refused to allow me to testify in front of a Grand
25 Jury, and I was subsequently charged with contempt by the Judge. However, a compromise was
26 negotiated through Doe 1's attorneys whereby I would testify in a private session attended by the
27 district attorney and my lawyer and I denied that I was sexually abused.

02/18/2014

1 18. In or about 1997, at the age of 14, my choreography career began to take off and I
2 began a long and storied career in the entertainment industry which continued until my second
3 nervous breakdown in March 2012 as described below.

4 19. As I got older, I would see Doe 1 about once a year and talked on the phone with
5 him two or three times a year. I do not recall that I ever stayed the night or slept in his bed again
6 after age 14. We worked together on some performances, and met for dinner a couple of times.

7 20. In 2005, Doe 1 was criminally tried for child sexual abuse. I was again subpoenaed
8 to testify. Doe 1 called me constantly and coached me by acting out similar role play as he did
9 with me in 1993 when I was 11, telling me things such as, "They are making up all these lies
10 about you and I, saying that we did all this disgusting sexual stuff. They are just trying to take US
11 down, take away my power and my money, take away our careers. We can't let them do this. We
12 have to fight them together." I would play along just as I did when I was 11. I still did not believe
13 that I was sexually abused. I did not believe that I was forced. I believed that I was a consenting
14 participant in the sexual acts that Doe 1 and I engaged in. I also believed that I was absolutely fine
15 with what went on between us. My state of mind was essentially the same as when I was eleven
16 and I denied any abuse.

17 21. In 2009 Doe 1 texted frequently and called me about his final concert and about
18 me possibly coming to see rehearsals at some point and then to come and see the show in London.

19 22. In June 2009, Doe 1 died. I was in shock. I could not believe it to be real that Doe
20 I could and did die. I was also very confused as to how to feel. I thought his death should make
21 me want to cry constantly but I found it hard to cry. I absolutely felt a great sense of loss.

22 23. In November 2010 my first son was born. Shortly after that, I got the job to direct
23 my first major studio feature film. Doe 1's prophecy was coming true, now I just had to fulfill my
24 end of the bargain, I thought.

25 24. Between April and August 2011, I had my first nervous breakdown which
26 included feelings of extreme stress, anxiety, fear, depression and insomnia. As a result, I removed
27 myself from the film. I started therapy with [REDACTED] and spoke to him about [REDACTED]

1 [REDACTED] Between July and March 2012 I immersed myself in work once again. I thought I
2 was back to "invincible status".

3 25. In March 2012, I had my second and final nervous breakdown which again
4 included feelings of extreme stress, anxiety, fear and depression. I would look at my son and
5 imagine him experiencing the sexual acts I did with Doe 1 - which I did not yet equate with being
6 sexually abused - and, for the first time in my life, I wondered if I needed to talk to someone
7 about what Doe 1 and I "did together." I knew that I truly had no idea how I felt about it. I still
8 thought that once I spoke to someone about it, I would be fine. In mid-April 2012, I began therapy
9 with [REDACTED]

10 [REDACTED]
11 [REDACTED] until May 8, 2012. On or
12 about that day I first spoke to [REDACTED] - and began to recognize for the first time myself - that
13 Doe 1 had molested me. [REDACTED] was the first person I had ever told, ever. This realization
14 initiated an enormous emotional, psychological, and physiological upheaval in my life that
15 continues to this day.

16 26. Since beginning to talk about the abuse, everything in my life has changed. I am
17 no longer in the entertainment business and can never be again. I need a new life for myself and
18 my family; this civil action, which for me involves finally speaking the truth as loud as I
19 suppressed it all these years, is a part of that process.

20 27. On March 4, 2013, I met with my lawyers Gradstein & Marzano for the first time
21 and was made aware of the fact that I could possibly file a claim against Doe 1's Estate. Prior to
22 March 4, I did not understand or was even aware that an Estate had been opened for
23 administration or that I could seek to make a claim. This was an enormous revelation for me
24 because up until recently I was psychologically incapable of admitting to myself or anyone that I
25 had been the victim of childhood sexual abuse, let alone seek redress for the psychological injury,
26 illness and damage that was caused by Doe 1. Doe 1's sexual abuse of me as a child, the things he
27 said to me and the trauma he caused made it impossible for me to act on my rights until now.

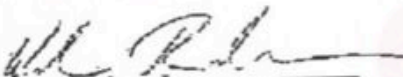
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1 28. I am not able to quantify the damages caused to me as a result of the loss of my
2 entertainment career. Before my final breakdown in 2012, I was on a path to major notoriety and
3 success in my field. I was a musical producer and songwriter. I had been signed as a recording
4 artist to a major label record company. I acted and hosted my own television show on MTV and
5 had been offered roles on other network television shows. I won two Emmy Awards for
6 outstanding choreography and received numerous other professional accolades for my work since
7 the age of 5, including directing several record breaking worldwide concert tours. Just before my
8 first breakdown, I was asked to direct a major motion picture. Had it not been for the sexual abuse
9 I suffered as a child, my emotional breakdowns as a result and my subsequent inability to return
10 to the life that Doe 1 "prophesized" I would have. I believe my career would have continued on
11 this upward trajectory. As I understand it, the damages asserted in my Claim can and will be
12 determined by experts.

13 29. In addition, I am just beginning to understand the extent of my psychological
14 injury, illness and damage resulting from Doe 1's sexual abuse of me as a child and without
15 doctors and/or experts; I am not in a position to quantify such damages except to say that it ruined
16 my life.

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

19 Executed this 30th day of April 2013, at Santa Monica, California.

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22 Wade Robson
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