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8
9 **UNITED STATES DISTRICT COURT**
10 **CENTRAL DISTRICT OF CALIFORNIA**

11 ESMÉ BIANCO,

12 Plaintiff,

13 v.

14 BRIAN WARNER a/k/a MARILYN
15 MANSON, individually, CIULLA
16 MANAGEMENT, INC., and TONY
17 CIULLA, individually,

18 Defendant.

No. 2:21-cv-3677

COMPLAINT

(JURY TRIAL DEMANDED)

19 1. Plaintiff ESMÉ BIANCO; (“Ms. Bianco” or “Plaintiff”), by and through her attorneys,
20 bring this action for damages and other legal and equitable relief, stating the following as Plaintiff’s
21 claims against BRIAN WARNER a/k/a MARILYN MANSON, individually (“Mr. Warner”),
22 CIULLA MANAGEMENT, INC. (“Ciulla Management”), and TONY CIULLA, individually
23 (“Mr. Ciulla” and, together with Ciulla Management and Mr. Warner, “Defendants”). Plaintiff
24 demands a trial by jury.

25 **INTRODUCTION**

26 2. This is an action brought by Plaintiff seeking damages from Defendants for sexual assault,
27 sexual battery, and/or violations of the Trafficking Victims Protection Reauthorization Act, and
28 any other cause(s) of action that can be inferred from the facts set forth herein.

3. Mr. Warner is a recording artist based in Los Angeles, California.

1 4. Ciulla Management is a privately owned Los Angeles-based music management company
2 established in 1996, whose clients have included Marilyn Manson, The Yeah Yeah Yeahs, Rob
3 Zombie, First Aid Kit, and Tove Lo.

4 5. Mr. Ciulla is a talent manager based in West Hollywood, California who served as the
5 personal manager for Mr. Warner for over 25 years and who, upon information and belief, is the
6 owner of Ciulla Management.
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8 6. Ms. Bianco is an internationally-acclaimed actress and performer, best-known for her role
9 as “Ros” in the Emmy Award-winning show, *Game of Thrones*.

10 7. Plaintiff alleges that she is entitled to recover general damages, special damages, and
11 punitive damages, as well as such other and further relief as this Court finds necessary and proper.
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13 JURISDICTION AND VENUE

14 8. This Court has jurisdiction over this action pursuant to 28 U.S.C. § 1331, which confers
15 original jurisdiction upon this Court for actions arising under the laws of the United States. This
16 Court also has jurisdiction over this action pursuant to 28 U.S.C. § 1367, which confers
17 supplemental jurisdiction upon this Court for all other claims that are so related to claims in the
18 action within such original jurisdiction that they form part of the same case or controversy under
19 Article III of the United States Constitution.

20 9. Venue is also proper in this Court pursuant to 28 U.S.C. § 1391(b) because Defendants
21 maintain offices, conduct business, and reside in this District.
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23 PARTIES

24 10. Defendant BRIAN WARNER a/k/a MARILYN MANSON is an individual who lives in
25 Los Angeles, California.

26 11. Defendant CIULLA MANAGEMENT is a privately held company with its headquarters
27 located at 1509 N. Crescent Heights #4, West Hollywood, California 93313.
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1 12. Defendant TONY CIULLA is an individual who lives in Los Angeles, California.

2 13. Plaintiff ESMÉ BIANCO is a person who has been aggrieved by Defendants' actions. She
3 is a citizen of the United States of America and is a resident of the state of California.

4 **STATEMENT OF FACTS**

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6 14. Ms. Bianco was introduced to Mr. Warner in 2005 through his then-fiancée. Mr. Warner
7 expressed an interest in casting Ms. Bianco, who was beginning her acting career, in an upcoming
8 film project. Over the next few years, the film project continued to be delayed, but Mr. Warner
9 remained in touch with Ms. Bianco. Mr. Warner floated other projects for Ms. Bianco, but none
10 materialized. Mr. Warner would meet with Ms. Bianco when he visited the United Kingdom for
11 work, where she resided at that time.

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13 15. After Mr. Warner's divorce in 2007, he made his first sexual overtures towards Ms. Bianco.
14 He asked her for nude photographs on multiple occasions, each time playing the request off as a
15 joke. He again made references to a potential film project in 2007.

16 16. In February 2009, Mr. Warner flew Ms. Bianco to Los Angeles for the first time—
17 allegedly to film a music video for his song "*I want to kill you like they do in the movies.*" Ms.
18 Bianco understood this to be a professional project that would be publicly released after being
19 filmed on Flip cameras by Mr. Warner himself. Upon arrival, Ms. Bianco found that there was no
20 crew present and that she was expected to stay at Mr. Warner's home rather than in the hotel that
21 had been previously booked. Throughout this shoot, Ms. Bianco was expected to be on-call 24/7
22 and as a result was subjected to sleep deprivation. She was told to wear lingerie as her "costume"
23 for the video. She was not provided food during the four days she spent in Los Angeles, but was
24 given drugs and alcohol.

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26 17. In addition to these deprivations, Ms. Bianco was threatened and physically beaten
27 by Mr. Warner. Mr. Warner repeatedly told Ms. Bianco that he would come to her room and rape
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1 her during the night. He threw tantrums where he would destroy camera equipment and throw
2 objects around the room. He forced Ms. Bianco to watch an extremely violent movie that caused
3 her to faint. He attempted to force her to perform sexual acts on camera with another woman who
4 was present throughout the shoot. Perhaps most horrifyingly, Mr. Warner locked Ms. Bianco in the
5 bedroom, tied her to a prayer kneeler, and beat her with a whip that Mr. Warner said was utilized
6 by the Nazis. He also electrocuted her.
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8 18. Ms. Bianco believed that if she protested any of this treatment, she would be seen
9 as unprofessional and barred from future professional opportunities—or worse, that Mr. Warner
10 would continue to harm her. Plaintiff has never seen any footage from this shoot and, upon
11 information and belief, it has never been published.
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13 19. From February to May 2009, Mr. Warner assured Ms. Bianco that the video was
14 being edited. He blamed others for the “disruptions” of the video shoot and convinced Ms. Bianco
15 that he was simply eccentric, and his art was misunderstood.
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17 20. In May 2009, Mr. Warner visited Ms. Bianco in London and they began a sexual
18 relationship. Though at this time sex between Ms. Bianco and Mr. Warner was consensual, Mr.
19 Warner bruised and bit Ms. Bianco and publicly groped her against her consent. He enforced a
20 “dress code” for Ms. Bianco during this trip and forced her to sit at his feet during press visits. He
21 verbally degraded her during interviews. He also attempted to bring a minor back to the hotel with
22 him and Ms. Bianco.
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24 21. After this visit, Ms. Bianco and Mr. Warner maintained a long-distance relationship
25 for several years. Mr. Warner flew Ms. Bianco out to Los Angeles for visits and told her they would
26 shoot videos and record music during these trips. No videos or music were recorded.
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28 22. In April 2011, Mr. Warner convinced Ms. Bianco to move to Los Angeles to live
with him while he helped her secure a visa and launch her career in the United States. Mr. Warner

1 defrauded Ms. Bianco by telling her that she would be starring in his upcoming feature film,
2 *Phantasmagoria*, and instructed Ms. Bianco to create a timeline for shooting and rehearsals. Ms.
3 Bianco spent two and a half months with Mr. Warner, enduring constant abuse. Mr. Warner
4 controlled Ms. Bianco's movements and threatened to interfere with her visa process. Mr. Warner
5 alternately kept Ms. Bianco awake for days at a time and then would lock her out of the apartment
6 overnight. She was not permitted to leave the apartment without permission, nor was she permitted
7 to receive visitors.
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9 23. Mr. Warner kept the apartment in near-total darkness and insisted that the
10 temperature remain at 63 degrees Fahrenheit. He was also frequently verbally abusive towards Ms.
11 Bianco, sometimes in front of others. Mr. Warner would berate Ms. Bianco if he did not like her
12 outfit, if she touched the thermostat, if she attempted to open the curtains in the apartment, if she
13 expressed discomfort with the violent and sexually graphic films Mr. Warner played throughout
14 the apartment, and if she failed to find objects he hid around the apartment. He also frequently
15 became enraged and would violently throw things around the apartment.
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17 24. On one occasion, Mr. Warner chased Plaintiff around the apartment with an ax,
18 smashing holes in the walls. On another occasion, Mr. Warner cut Ms. Bianco with a Nazi knife
19 during sex, without her consent, and photographed the cuts on her body. He then posted the photos
20 online without her consent. Mr. Warner's friends, band mates, assistant, producer, and other
21 colleagues witnessed various aspects of this abuse—including Mr. Ciulla. Ms. Bianco was only
22 able to escape the apartment while Mr. Warner slept in June 2011. When Mr. Warner discovered
23 Ms. Bianco had left, he threatened to have her visa revoked and to "punish" her when he next saw
24 her.
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1 bedroom, threatening her if she attempted to leave the apartment without permission, restricting
2 her communications, and interfering with her visa process.

3 30. In addition to the sexual acts demanded by Mr. Warner through force and/or threats
4 of force, , Plaintiff was also required to provide unpaid labor for Mr. Warner during the April 2011
5 to July 2011 period. This included serving and preparing food for Mr. Warner and his guests,
6 cleaning his apartment, consulting on his album, providing uncredited backup vocals during the
7 creative process for the album *Born Villain*, and being offered up to his guests and bandmates to
8 “spank.” Mr. Warner implied that because he had brought Ms. Bianco to the United States and
9 provided housing, she owed him labor and sexual intimacy. Plaintiff feared for her safety and that
10 of her friends and family if she did not comply.

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12 31. Mr. Ciulla and Ciulla Management jointly and severally represented Mr. Warner
13 throughout this period. Mr. Ciulla and Ciulla Management knew of Mr. Warner’s conduct and
14 benefitted financially from allowing this abuse to continue. Ms. Bianco interacted daily with Mr.
15 Warner’s bandmates, producer, and assistants. These parties witnessed Mr. Warner’s abuse directly
16 and received photos from Mr. Warner of the damage he caused to Ms. Bianco. Mr. Warner’s former
17 assistants discussed Mr. Warner’s abuse directly with Mr. Ciulla.

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19 32. Ms. Bianco herself would contact Mr. Ciulla when Mr. Warner’s temper tantrums
20 ensued. Mr. Warner’s assistant also coordinated Ms. Bianco’s travel and lodging each time she
21 visited Mr. Warner with full knowledge of Mr. Ciulla and Ciulla Management and acted as Ms.
22 Bianco’s “babysitter” when Mr. Warner was not present. Mr. Warner’s management had a vested
23 interest in supporting his violent tendencies to encourage the creation of his “art” and the promotion
24 of the brand of Marilyn Manson, and were complicit in Mr. Warner’s abuse of Ms. Bianco. It was
25 only after these abuse allegations were made public in February 2021 that Mr. Ciulla and Ciulla
26 Management withdrew from their representation of Mr. Warner—after more than 25 years.
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Sexual Assault & Sexual Battery

33. Mr. Warner used drugs, force, and threats of force to coerce sexual acts from Ms. Bianco on multiple occasions. Mr. Warner raped Ms. Bianco in or around May 2011. Ms. Bianco was well aware of the violence Mr. Warner could dole out if she fought back, having been on the receiving end of his temper many times. He also supplied drugs to Ms. Bianco and deprived her of sleep and food in order to weaken her physically and mentally and decrease her ability to refuse him.

34. Mr. Warner committed sexual acts with Ms. Bianco when she was unconscious or otherwise unable to consent.

35. Mr. Warner also committed sexual battery against Ms. Bianco on multiple occasions throughout her time in Los Angeles in 2011. These acts include spanking, biting, cutting, and whipping Ms. Bianco’s buttocks, breasts, and genitals for Mr. Warner’s sexual gratification—all without the consent of Plaintiff.

CAUSES OF ACTION

**AS AND FOR A FIRST CAUSE OF ACTION FOR SEXUAL ASSAULT,
CA. CODE CIV. PRO. § 340.16, AGAINST DEFENDANT WARNER**

36. Plaintiff repeats and re-alleges the allegations contained in the paragraphs above, as if fully set forth herein.

37. Defendant Warner committed a sexual assault of Plaintiff as more fully described in Section 243.4, 261, 262, 264.1, 286, 287, or 289, or former Section 288a, of the California Penal Code, and/or assault with the intent to commit any of those crimes, and/or or an attempt to commit any of those crimes.

38. Plaintiff’s requests for relief are set forth below.

1 ***AS AND FOR A SECOND CAUSE OF ACTION FOR SEXUAL BATTERY,***
2 ***CA. CODE. CIV. PRO. § 1708.5, AGAINST DEFENDANT WARNER***

3 39. Plaintiff repeats and re-alleges the allegations contained in the paragraphs above, as if fully
4 set forth herein.

5 40. Defendant Warner acted with the intent to cause a harmful or offensive contact with an
6 intimate part of Plaintiff, and a sexually offensive contact with Plaintiff directly or indirectly
7 resulted.

8 41. Defendant Warner also acted with the intent to cause a harmful or offensive contact with
9 Plaintiff by use of his intimate part, and a sexually offensive contact with that person directly or
10 indirectly resulted.

11 42. Defendant Warner also acted to cause an imminent apprehension of the conduct described
12 above, and a sexually offensive contact with Plaintiff directly or indirectly resulted.

13 43. Plaintiff's requests for relief are set forth below.

14 ***AS AND FOR A THIRD CAUSE OF ACTION FOR A VIOLATION OF THE***
15 ***TRAFFICKING VICTIMS PROTECTION REAUTHORIZATION ACT ("TVPRA"),***
16 ***18 U.S.C.S. § 1589, AGAINST DEFENDANTS***
17 ***WARNER, CIULLA, AND CIULLA MANAGEMENT***

18 44. Plaintiff repeats and re-alleges the allegations contained in the paragraphs above, as if fully
19 set forth herein.

20 45. Defendant Warner knowingly obtained the labor or services of Plaintiff by means of force,
21 threats of force, physical restraint, or threats of physical restraint to that person or another person;
22 by means of serious harm or threats of serious harm to Plaintiff or another person; by means of the
23 abuse or threatened abuse of law or legal process; or by means of any scheme, plan, or pattern
24 intended to cause Plaintiff to believe that, if she did not perform such labor or services, she or
25 another person would suffer serious harm or physical restraint.
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1 46. Defendants Ciulla and Ciulla Management knowingly benefited financially and/or by
2 receiving value from their participation in a venture which engaged in the providing or obtaining
3 of labor or services by any of the means described above, or knowing or in reckless disregard of
4 the fact that the venture has engaged in the providing or obtaining of labor or services by any of
5 such means.

7 47. Plaintiff's requests for relief are set forth below.

8 **PRAYER FOR RELIEF**

9 **WHEREFORE**, Plaintiff, on behalf of herself, prays for the following relief:

- 10 A. That Plaintiff be awarded actual damages;
- 11 B. That Plaintiff be awarded compensatory damages where available;
- 12 C. That Plaintiff be awarded punitive damages;
- 13 D. That Plaintiff be awarded pre and post judgment interest;
- 14 E. That the Court award Plaintiff her attorneys' fees and costs associated with this matter,
15 including but not limited to expert fees and costs; and
16

17 Plaintiff further demands that she be awarded such other and further legal and equitable relief as
18 may be found appropriate and as the Court may deem just or equitable.

21 Dated: April 30, 2021



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