DECLARATION OF J. CHANDLER

I, J. Chandler, declare:

- 1. I am the plaintiff in this lawsuit against Michael Jackson. I was born on January 11, 1980 and I am 13-years old. I am currently in the eighth grade. I first met Michael Jackson when I was five years old at a restaurant that my mother, stepfather and I often went to.
- 2. In about May of 1992 I met Michael Jackson again at my stepfather's car rental business, Rent-a-Wreck. My stepfather called me and told me that Michael Jackson was at Rent-a-Wreck and that I should come down and see him. Later I learned from my stepfather that Michael Jackson's car had broken down and that he was at Rent-a-Wreck to get another car while his was being repaired.
- 3. After I set Michael Jackson at Rent-a-Wreck he began calling me on the telephone. From about May of 1992 until about February 1993 (when I first spont the weekend with Michael Jackson at Neverland), I received many telephone calls from Michael Jackson. For at least part of this time Michael Jackson was on tour and he would be calling me from various places throughout the world. On occasion these telephone conversations lasted as long as three hours. Michael Jackson and I talked about video games, the Neverland Ranch, water fights, and famous people that he knew.
- 4. In about February 1993, my mother, Lily (my half sister), and I went to Neverland at the invitation of Michael Jackson. The three of us stayed together in the guest area. I did not spend the night with Michael Jackson. This was a weekend

trip.

.1

:L

1:3

- 5. I spent the entire weekend with Michael Jackson. We went on jet skis in a small lake he had, saw the animals that he kept at Neverland, played video games and went on golf cart rides. One evening he took Lily and me to Toys 'R Us and we were allowed to get anything we wanted. Although the store was closed, it was opened just for our visit.
- Vegas as a guest of Michael Jackson. We flew on a private airplane. We stayed at a large suite at the Mirage Hotel. My mother and Lily shared a bedroom. We stayed at the Mirage Hotel about a week. One night Michael Jackson and I watched the Exorcist in Michael Jackson's bedroom. When the movie was over, I was scared. Michael Jackson suggested that I spand the night with him, which I did. Although we slept in the same bed there was no physical contact.
- 7. From that time, whenever Michael Jackson and I were together we slept in the same bed. We spent two or three additional nights in the same bed at Las Vegas. Again, there was no physical contact.
- 8. After I returned from the Las Vegas trip, my friendship with Michael Jackson became much closer. My mother, Lily and I started making frequent trips to Meverland. At Meverland I would always sleep in bed with Michael Jackson. I also slept in bed with Michael Jackson at my house and at hotels in New York, Florida and Europe. We were together until our relationship ended in July 1993. During our relationship Michael Jackson had mexual contact with me on many occasions.
 - 9. Physical contact between Michael Jackson and myself

2

3

4

5

6

7

8

9

10

11

12

13

14

20

21

22

23

24

25

26

27

28

increased grac ally. The first step was apply Michael Jackson hugging me. The next step was for him to give me a brief kiss on the cheek. He then started kissing me on the lips, first briefly and then for a longer period of time. He would kise me while we ware in bed together.

- 10. The next step was when Michael Jackson put his tongue in my mouth. I told him I did not like that. Michael Jackson started crying. He said there was nothing wrong with it. He said that just because most people believe something is wrong, doesn't make it so.
- 11. Michael Jackson told me that another of his young friends would kiss him with an open mouth and would let Michael Jackson put his tongue in his mouth. Michael Jackson said that I did not love him as much as this other friend.
- 12. The next step was when Michael Jackson rubbed up against me in bed. The next step was when we would lie on top of each other with erections.
- 13. During May of 1993, my mother, Lily and I want with Michael Jackson to Monaco in Europe. Michael Jackson and I both had colds so we stayed in the room all day while my mother and Lily were out. That's when the whole thing really got out of hand. We took a bath together. This was the first time that we had seen each other maked. Michael Jackson named certain of his children friends that masturbated in front of him.
- 14. Michael Jackson then masturbated in front of me. He told me that when I was ready, he would do it for me. While we were in bed, Michael Jackson put his hand undermeath my underpants. He then masturbated me to a climax. After that

Michae	l Jackson	masturbated	34	many	times	both	with	his	band	and
with b	is mouth.	,			٠					

- 15. Michael Jackson had he suck one nipple and twist the other nipple while Michael Jackson masturbated. On one occasion when Michael Jackson and I were in bed together Michael Jackson grabbed my buttock and kissed me while he put his tongue in my ear. I told him I didn't like that. Michael Jackson started to cry.
- 16. Michael Jackson told me that I should not tell anyone what had happened. He said this was a secret.
- 17. My relationship with Michael Jackson ended when my father obtained custody of me in July 1993 and I started living permanently at my father's house.

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

Executed on December 28, 1993, at Santa Monica, California.



CHANDLER PLOCUS-CHAIL DEC