

1 DECLARATION OF J. CHANDLER

2 I, J. Chandler, declare:

3 1. I am the plaintiff in this lawsuit against Michael
4 Jackson. I was born on January 11, 1980 and I am 13-years-old.
5 I am currently in the eighth grade. I first met Michael Jackson
6 when I was five years old at a restaurant that my mother,
7 stepfather and I often went to. mjfacts.com

8 2. In about May of 1992 I met Michael Jackson again at my
9 stepfather's car rental business, Rent-a-Wreck. My stepfather
10 called me and told me that Michael Jackson was at Rent-a-Wreck
11 and that I should come down and see him. Later I learned from my
12 stepfather that Michael Jackson's car had broken down and that he
13 was at Rent-a-Wreck to get another car while his was being
14 repaired.

15 3. After I met Michael Jackson at Rent-a-Wreck he began
16 calling me on the telephone. From about May of 1992 until about
17 February 1993 (when I first spent the weekend with Michael
18 Jackson at Neverland), I received many telephone calls from
19 Michael Jackson. For at least part of this time Michael Jackson
20 was on tour and he would be calling me from various places
21 throughout the world. On occasion these telephone conversations
22 lasted as long as three hours. Michael Jackson and I talked
23 about video games, the Neverland Ranch, water fights, and famous
24 people that he knew.

25 4. In about February 1993, my mother, Lily (my half
26 sister), and I went to Neverland at the invitation of Michael
27 Jackson. The three of us stayed together in the guest area. I
28 did not spend the night with Michael Jackson. This was a weekend

1 trip.

2 5. I spent the entire weekend with Michael Jackson. We
3 went on jet skis in a small lake he had, saw the animals that he
4 kept at Neverland, played video games and went on golf cart
5 rides. One evening he took Lily and me to Toys 'R Us and we were
6 allowed to get anything we wanted. Although the store was
7 closed, it was opened just for our visit.

8 6. In late March 1993, my mother, Lily and I went to Las
9 Vegas as a guest of Michael Jackson. We flew on a private
10 airplane. We stayed at a large suite at the Mirage Hotel. My
11 mother and Lily shared a bedroom. We stayed at the Mirage Hotel
12 about a week. One night Michael Jackson and I watched the
13 Exorcist in Michael Jackson's bedroom. When the movie was over,
14 I was scared. Michael Jackson suggested that I spend the night
15 with him, which I did. Although we slept in the same bed there
16 was no physical contact.

17 7. From that time, whenever Michael Jackson and I were
18 together we slept in the same bed. We spent two or three
19 additional nights in the same bed at Las Vegas. Again, there was
20 no physical contact.

21 8. After I returned from the Las Vegas trip, my friendship
22 with Michael Jackson became much closer. My mother, Lily and I
23 started making frequent trips to Neverland. At Neverland I would
24 always sleep in bed with Michael Jackson. I also slept in bed
25 with Michael Jackson at my house and at hotels in New York,
26 Florida and Europe. We were together until our relationship
27 ended in July 1993. During our relationship Michael Jackson had
28 sexual contact with me on many occasions.

9. Physical contact between Michael Jackson and myself

1 increased gradually. The first step was to reply Michael Jackson
2 hugging me. The next step was for him to give me a brief kiss on
3 the cheek. He then started kissing me on the lips, first briefly
4 and then for a longer period of time. He would kiss me while we
5 were in bed together.

6 10. The next step was when Michael Jackson put his tongue
7 in my mouth. I told him I did not like that. Michael Jackson
8 started crying. He said there was nothing wrong with it. He
9 said that just because most people believe something is wrong,
10 doesn't make it so.

11 11. Michael Jackson told me that another of his young
12 friends would kiss him with an open mouth and would let Michael
13 Jackson put his tongue in his mouth. Michael Jackson said that I
14 did not love him as much as this other friend.

15 12. The next step was when Michael Jackson rubbed up
16 against me in bed. The next step was when we would lie on top of
17 each other with erections.

18 13. During May of 1993, my mother, Lily and I went with
19 Michael Jackson to Monaco in Europe. Michael Jackson and I both
20 had colds so we stayed in the room all day while my mother and
21 Lily were out. That's when the whole thing really got out of
22 hand. We took a bath together. This was the first time that we
23 had seen each other naked. Michael Jackson named certain of his
24 children friends that masturbated in front of him.

25 14. Michael Jackson then masturbated in front of me. He
26 told me that when I was ready, he would do it for me. While we
27 were in bed, Michael Jackson put his hand underneath my
28 underpants. He then masturbated me to a climax. After that

1 Michael Jackson masturbated me many times both with his hand and
2 with his mouth.

3
4 15. Michael Jackson had me suck one nipple and twist the
5 other nipple while Michael Jackson masturbated. On one occasion
6 when Michael Jackson and I were in bed together Michael Jackson
7 grabbed my buttock and kissed me while he put his tongue in my
8 ear. I told him I didn't like that. Michael Jackson started to
9 cry.

10 16. Michael Jackson told me that I should not tell anyone
11 what had happened. He said this was a secret.

12 17. My relationship with Michael Jackson ended when my
13 father obtained custody of me in July 1993 and I started living
14 permanently at my father's house.

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

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

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20 J. Chandler
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