

DECLARATION OF CHRISTOPHER MICHAEL TURCOTTE

1. I have personal knowledge of each fact set forth in this declaration.
2. I met Michael Egan in Burbank, California when we were in high school in 1999, and I was fifteen years old. In 1999, Egan and I spent a considerable amount of time with our friend Scott Shackley from school, at the house (the "House") of Scott's older brother, Chad Shackley.
3. Chad Shackley and Marc Collins-Rector, who both lived at the House, were the principals of an internet company called Digital Entertainment Network ("DEN"). Egan regularly expressed to me that he hoped to become rich by working for DEN and being an actor in DEN's internet videos.
4. It was made clear to the three of us kids (me, Egan, and Scott Shackley) that any drug use of any kind was strictly forbidden in the house.
5. One day in 2000, Egan asked me to meet him. He told me that DEN was not going to be financially successful, and therefore his career as a DEN actor or DEN executive was doomed. He then told me that he had gotten Marc Collins-Rector "going" and had touched his genitals and allowed Collins-Rector to touch him. He told me it was easy to manipulate Collins-Rector. Egan told me that he was going to sue Collins-Rector for sexual misconduct.
6. Egan said to me that the "smart" thing for me to do was to sue Collins-Rector and claim I had been molested. I said that this wasn't possible, because Collins-Rector hadn't molested me. Egan told me that it didn't matter that it wasn't true, because if both of us claimed that Collins-Rector had molested us, it would be two against one, "rock solid," and that Collins-Rector would settle out of court quickly, in order to avoid any bad press for DEN, and we would get rich. He emphasized that if we came with the same story it would be more believable.

7. I told Egan I needed some time to think about it. I decided to tape record Egan explaining his scheme to me, so that there would be proof of exactly what Egan was planning. I went back to Egan's apartment with the tape recorder and asked him to explain the plan to me again, but Egan searched my pockets and found the tape recorder, so I never was able to record Egan.

8. I refused to participate in Egan's scheme.

9. During the entire time I was at the House, I never saw Brock Pierce engage in any improper conduct of any kind.

10. In 2014, I read a news article about how Egan sued a new set of defendants, using the same story he had made up in 2000, but this time claiming he was molested in Hawaii. I know for a fact that Egan's 2014 case was fraudulent, first, because during the time Egan claimed he was in Hawaii he and I were both in Los Angeles, together, and Egan never went to Hawaii during that time frame, and, second, because this was the same story he tried to get me to make up in 2000.

11. Shortly thereafter, I was contacted by the production team from Disarming Films, and they told me that they were producing a documentary (it would later be titled "*An Open Secret*"), with Amy Berg directing, about child actors being taken advantage of in the entertainment industry. They informed me that they had already interviewed Egan about his experience and they wanted to get my point of view.

12. I had a long telephone interview with one of the production assistants, and I clearly expressed that Egan lacked integrity and truthfulness, and described Egan's lying, manipulating, and scamming. I spoke to two production assistants, the assistant director and Amy Berg, and all of them promised me that my words would not be misused or distorted.

When they acknowledged this, I agreed to fly out to California to be interviewed for their documentary.

13. When I was interviewed on camera, I explained Egan's lying, and that literally everything that comes out of Egan's mouth is a lie. I explained on camera that drugs were never allowed at the House, and that I never saw any other minors at the House besides myself, Egan, and Scott Shackley.

14. Throughout the interview, Amy Berg repeatedly asked me to say that Hollywood executives took advantage of me. I told Ms. Berg, that this never happened, that everything that has to do with Egan is a scam, and everything he said about any alleged molestation at the House is a lie.

15. When the film *An Open Secret* was released, Ms. Berg had edited out everything I said about Egan lying and manipulating, and instead the film used out of context comments by me that made it look like I was supporting Egan's claims, even though I had stated the exact opposite.

Executed under penalty of perjury under the laws of the State of California on June 13, 2018 in Los Angeles, California.


CHRISTOPHER MICHAEL TURCOTTE

CALIFORNIA JURAT WITH AFFIANT STATEMENT

GOVERNMENT CODE § 8202

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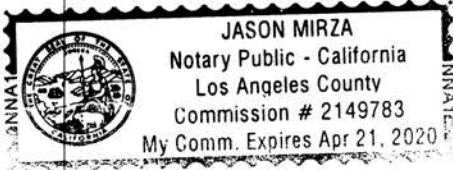
Subscribed and sworn to (or affirmed) before me
 on this 13th day of JUNE, 2018,
 by _____
Date Month Year

(1) CHRISTOPHER M TURCOTTE

(and (2) _____),
Name(s) of Signer(s)

proved to me on the basis of satisfactory evidence
 to be the person(s) who appeared before me.

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