

GERAGOS & GERAGOS

A PROFESSIONAL CORPORATION
LAWYERS

HISTORIC ENGINE CO. NO. 28
644 SOUTH FIGUEROA STREET
LOS ANGELES, CALIFORNIA 90017-3411
TELEPHONE (213) 625-3900
FACSIMILE (213) 232-3255
GERAGOS@GERAGOS.COM

MARK GERAGOS, SBN 108325
TINA GLANDIAN, SBN 251614
Attorneys for Respondent Frank Cascio

SUPERIOR COURT FOR THE STATE OF CALIFORNIA

COUNTY OF LOS ANGELES

THE MICHAEL JACKSON COMPANY, LLC;
JOHN G. BRANCA and JOHN MCCLAIN,
individually and as Officers of THE MICHAEL
JACKSON COMPANY, LLC and Co-Executors of
the ESTATE OF MICHAEL JACKSON,

Petitioners,

v.

FRANK CASCIO and DOES 1-10, inclusive,

Respondents.

Case No: 25SMCP00385

DECLARATION OF ALDO CASCIO

Hearing: November 6, 2025
Time: 8:30 a.m.
Place: Dept. 207
Hon. Michael E. Whitaker

DECLARATION OF ALDO CASCIO

I, Aldo Cascio, declare as follows:

1. I am the brother of Respondent Frank Cascio and a Doe respondent in this matter. I make this declaration based upon my own personal knowledge, and if called as a witness, I could and would testify competently to the following facts.

2. I make this declaration in support of Respondent's opposition to the Notice of Hearing on Petition to Compel Arbitration and in support of the request for a declaration that the purported settlement agreement is void and unenforceable.

3. I have three other siblings, Edward, Marie, and Dominic.

4. From childhood through adulthood, my family and I had a long-standing relationship with Michael Jackson that extended over many years. We spent significant time with him at his residences and other locations in California, New York, and New Jersey, often for weeks or months at a time. We also spent significant time with him overseas.

5. During the period of approximately late 2003 through 2004, when Michael Jackson was under criminal investigation, I personally witnessed Michael's efforts to keep my siblings and me away from his then-attorney, Mark Geragos. Michael instructed us to stay out of sight whenever Mr. Geragos came to meet with him, and he repeatedly emphasized that Mr. Geragos could not know we were there.

6. I specifically remember one occasion when my sister, Marie, and I were staying in a hotel in Las Vegas, Nevada when Mr. Geragos arrived to meet with Michael. Before his arrival, Michael directed us to stay in his suite and remain there until he finished meeting with Mr. Geragos in the adjoining room. Michael was adamant that Mr. Geragos not see us or know we were there with him.

7. I recall Michael giving my siblings and I similar instructions when he was meeting with another one of his criminal defense lawyers, Thomas Mesereau, shortly after that.

8. At the time, I accepted Michael's instructions without question, but in hindsight, it was clear he was concealing us deliberately.

9. Recently, after we disclosed our experiences to Mr. Geragos, he told me he had never been aware that we were present at those locations or that Michael had close contact with us during that period. He was visibly surprised to learn that Michael had intentionally kept us separate and hidden from him.

10. When the Estate of Michael Jackson learned in 2019 of my and my siblings' experiences with Michael Jackson, they quickly sought to silence us and to control and suppress the truth.

11. In December 2019, a representative of the Estate came to my father's restaurant in New Jersey, where we gathered in a private room upstairs to sign the "settlement agreement." All of my

1 siblings were present except Frank, who was living in California at the time. My parents attended, as did
2 my siblings and their spouses, because the Estate required them to. The Estate's representative only
3 brought a single copy of the agreement which was read aloud before we were each told to sign it. Nobody
4 signed the agreement on behalf of the Estate.

5 12. At the time, I was vulnerable, angry, and still processing the enormity of what I had lived
6 through, and the sudden shock that my siblings had similarly been abused. I remember feeling rushed,
7 pressured, and cornered, like I had no real choice but to sign what the Estate's representative presented.
8 I had no lawyer, I had not reviewed the agreement beforehand (as it had not been presented to me), and
9 I had no meaningful ability to understand what I was signing. I did not understand the legal terms of the
10 agreement when I signed it and nobody explained them to us.

11 13. Neither I nor my siblings (nor my parents nor my siblings' spouses) were given copies of
12 the agreement after we signed it. We were not allowed to retain our own counsel. In fact, we were told
13 by the Estate's representative that if we retained counsel, the agreement would not get done or would be
14 prolonged indefinitely. We were shocked, confused, traumatized, and without legal guidance.

15 14. Further, the Estate misrepresented the nature of what they were asking us to sign. They
16 disguised the settlement as a "life rights" agreement which was also confusing to us.

17 15. At the time we signed the agreement, my siblings and I were in an extremely vulnerable
18 state. We were subjected to intense time pressure and presented the agreement on a take-it-or-leave-it
19 basis.

20 16. The pressure we felt was compounded by the Estate's exploitation of our family's
21 relationship with Michael's children. The Estate specifically directed us not to inform them about the
22 agreement or the underlying abuse, even though our long-standing relationship made such concealment
23 profoundly unnatural and distressing.

24 17. I did not sign the purported agreement freely or voluntarily but under duress and undue
25 influence, without counsel, while traumatized, and without fully understanding many of its terms. The
26 Estate knew I was in crisis—it was aware I was in therapy and had even covered part of the cost. At that
27 time, I was overwhelmed by trauma, feeling that both I and my family were falling apart, and that there
28 was no way out of the hell we were living.

18. Signing that agreement felt like a continued form of manipulation and coercion. The
entire process exacerbated my trauma. I felt stripped of dignity and forced into silence about the most
painful truth of my life.

19. I was later advised that the agreement is void and unenforceable under California law,
because it sought to silence me and my siblings about our childhood sexual abuse.

1 20. I also later learned that the Estate misled us to believe that its representatives were there
2 to help us when, in truth, they were advancing the Estate's own agenda. Specifically, the Estate's
3 representatives told us that six percent of our compensation would be deducted to pay the two
4 representatives who were supposedly assisting our family in the settlement process. This led us to believe
5 that these individuals were acting in our best interests. Only later did we discover that they were, in fact,
6 working for the Estate—and being paid by it.

7 21. The Estate's misconduct did not end with the signing of the agreement. The Estate has
8 since gone further, publicly accusing me and my family of "extortion" and a "shakedown," disclosing
9 supposed confidential terms, and filing this Petition in open court. Each of these actions has compounded
10 my suffering. Being branded a liar or extortionist about my childhood abuse has been humiliating,
11 degrading, and deeply wounding.

12 22. The ongoing attacks and attempts to silence us has broken me down in ways I never
13 thought possible. Watching how much pain and chaos this man brought into my family's life has been
14 unbearable. I still struggle to wrap my head around the full extent of what he has done, and the pain that
15 continues to ripple through everything. Ever since everything came to light, it has been one thing after
16 another, and honestly, I feel like I am living through a nightmare I cannot wake up from.

17 23. For all these reasons, I respectfully submit that the purported settlement agreement is void
18 and unenforceable, or in the alternative, rescinded. Petitioners' attempt to compel arbitration should be
19 denied.

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

22 Executed this 27th day of October, 2025, at San Bernardino, California.

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ALDO CASCIO

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action; my business address is 644 South Figueroa Street Los Angeles, California 90017-3411.

On October 27, 2025, I served the foregoing document(s) described as **DECLARATION OF ALDO CASCIO** on the interested parties in this action addressed as follows:

Martin D. Singer, Esq.
Allison S. Hart, Esq.
LAVELY & SINGER, P.C.
2049 Century Park East, Suite 2400
Los Angeles, CA 90067-2906
mdsinger@lavelysinger.com
ahart@lavelysinger.com

Jonathan P. Steinsapir, Esq.
Katherine T. Kleindienst, Esq.
KINSELLA HOLLEY ISER KUMP
STEINSAPIR LLP
11766 Wilshire Blvd., Suite 750
Los Angeles, CA 90025
jsteinsapir@khiks.com
kkleindienst@khiks.com

Attorneys for Petitioners

Said service was made by placing true copies thereof enclosed in a sealed envelope(s) addressed as stated above AND,

☐ (U.S. MAIL) Placing the envelope for collection and mailing on the date and at our business address following our ordinary business practices. I am readily familiar with this business's practice for collecting and processing correspondence for mailing. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service in a sealed envelope with postage fully prepaid.

☒ (BY ELECTRONIC TRANSMISSION) I caused the above-described document to be transmitted by electronic transmission.

Executed on October 27, 2025 at Los Angeles, California.

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

/s/ Tony Benitez
TONY BENITEZ