

VIRGINIA:

IN THE CIRCUIT COURT OF FAIRFAX COUNTY

JOHN C. DEPP, II

Plaintiff,

v.

AMBER LAURA HEARD

Defendant.

Civil Action No.: CL-2019-0002911

DECLARATION OF AMBER LAURA HEARD

1 DECLARATION OF AMBER LAURA HEARD

2 I, Amber Laura Heard, declare as follows:

3 1. I am a party in the above-entitled action. I have firsthand, personal knowledge of
4 the facts set forth below and if called as a witness could competently testify thereto.

5 2. I first met John C. Depp, II (“Johnny”) in 2009, and we started dating around the
6 end of 2011 or early 2012. For the first year of our relationship, Johnny was sober and our
7 relationship blossomed. We were in love.

8 3. About a year into our relationship, I began to witness Johnny abusing drugs and
9 alcohol or would notice that he was drunk or high. He frequently went in and out of drug and
10 alcohol dependency medical care, including 24-hour live-in medical aid for the last three years of
11 our relationship. On some occasions, when Johnny simultaneously used both illegal narcotics and
12 prescription medications I have had to get him medical attention. Whenever he was using, I
13 worried for both of us. He would become a totally different person, often delusional and violent.
14 We called that version of Johnny, “the Monster.”

15 4. Johnny often would not remember his delusional and violent conduct after he came
16 out of his drunk or medicated states. Eventually, as his abuse continued, I began to document the
17 injuries and destruction with photographs or videos so that I could show Johnny what he had done
18 while in his altered state. Because I loved Johnny, I had believed his multiple promises that he
19 could and would get better. I was wrong.

20 **Late 2012/Early 2013, Los Angeles, California:**

21 5. The first time Johnny hit me was at the end of 2012 or in early 2013. We were in
22 Los Angeles, California, talking about a tattoo, and I laughed at something Johnny had said. I
23 thought he had made a joke. He responded by slapping me across the face. Each hit was harder
24 than the one before. The third hit knocked me to the floor. I did not respond physically or
25 verbally; I froze, whether out of fear or shock, and then I went home without saying a word. I
26 thought about leaving Johnny then.

1 **March 8, 2013, Los Angeles, California:**

2 6. Johnny hit me again on March 8, 2013 in my Los Angeles home. This was just one
3 unfortunate incident in a series around that time where Johnny would become volatile and violent
4 when under the influence of drugs and alcohol, then contrite and apologetic when he would sober
5 up. On this particular incident, Johnny was getting drunk and high alone, and was angry that I had
6 hung up a painting given to me by someone I had formerly dated. He tried to set fire to the
7 painting the following morning. Johnny's team and I asked my sister Whitney to come over to try
8 to intervene with Johnny, which she did. At some point after she left, Johnny resumed his fight
9 with me, and hit me so hard that blood from my lip ended up on the wall. Attached hereto as
10 Exhibit 1 is a true and correct copy of a text message exchange Johnny and I had the following
11 Tuesday. On my phone, I had labeled Johnny as "Steve," and on his phone, he labeled me "Slim,"
12 in part to protect our privacy if anyone else came into possession of our phones.

13 **May 24, 2014, Flight from Boston, Massachusetts to Los Angeles, California:**

14 7. On or about May 24, 2014, I met Johnny in Boston, and we both flew from Boston
15 to Los Angeles on a private plane. Johnny appeared to have been drinking heavily and was
16 holding a bottle of champagne when I met him in the morning. On the flight, Johnny ordered the
17 flight attendants to give him an oxygen tank, and drank heavily. Johnny's handlers told me that he
18 was upset that I was filming a movie with a romantic scene with James Franco the day before.
19 Soon, Johnny began to throw objects at me. Instead of reacting to his behavior, I simply moved
20 seats. That didn't stop him. He provocatively pushed a chair at me as I walked by, yelled at me,
21 and taunted me by yelling out the name "James Franco." At some point, I stood up, and Johnny
22 kicked me in the back, causing me to fall over. Johnny threw his boot at me while I was on the
23 ground. Johnny continued to scream obscenities until he went into the plane bathroom and passed
24 out locked in the bathroom for the remainder of the flight. Attached hereto as Exhibit 2 is a true
25 and correct copy of text messages exchanged between me and Johnny (labeled "Steve") dated May
26 25, 2014. In them, Johnny admitted, "Once again, I find myself in a place of shame and regret.
27 Of course, I am sorry. I really don't know why or what happened. But I will never do it again."
28

1 8. Johnny's assistant Stephen Deuters (labeled "Stephen" on my phone) also texted
2 me on May 25, 2014 to pass along Johnny's apologies for his behavior during the flight. Stephen
3 admitted that Johnny "was appalled. When I told him he kicked you, he cried." Attached hereto
4 as Exhibit 3 is a true and correct copy of the text message exchange between me and Deuters dated
5 May 25, 2014, in which Deuters confirmed my memory of what took place and relayed messages
6 from Johnny to me. Specifically, Exhibit 3 was generated by a forensics expert who extracted
7 these text messages from my phone in 2016 to disprove allegations that I had somehow doctored
8 or fabricated these messages.

9 **August 2014, Bahamas:**

10 9. In August of 2014, Johnny and I took a trip to the Bahamas to try to help Johnny
11 detox under the supervision of his full-time, live-in nurse, Debbie Lloyd. While we were in the
12 Bahamas, Johnny had a number of manic episodes requiring medical attention that Debbie was
13 unable to manage on her own, so we flew in Dr. David Kipper, Johnny's private doctor, to help
14 manage his increasingly severe episodes.

15 10. On August 17, 2014, while in the Bahamas, Johnny and I got into a fight during
16 which Johnny kicked and pushed me to the ground, slapped me with an open hand, and grabbed
17 me by the hair. During his attack, Johnny kicked the door so hard that it splintered Attached
18 hereto as Exhibit 4 are true and correct copies of photographs of the broken door.

19 11. I contacted Dr. Kipper and his assistant Debbie Lloyd for help with Johnny and
20 managing his complex drug regimen. They both arrived on the night of August 17, 2014, and
21 observed my injuries. We all continued to monitor Johnny for several days thereafter. Attached
22 hereto as Exhibit 5 are true and correct copies of text messages I exchanged with Dr. David Kipper
23 and his assistant Debbie Lloyd during that time frame.

24 **December 17, 2014, Los Angeles, California:**

25 12. On December 17, 2014, after Johnny had a particularly violent episode, he
26 apologized for his behavior, calling himself a "fucking savage." Attached hereto as Exhibit 6 are
27 true and correct copies of screenshots of that text message exchange (again, Johnny is "Steve").
28

1 **January 25, 2015, Tokyo, Japan:**

2 13. On or around January 25, 2015, Johnny and I were in a hotel room in Tokyo, Japan.
3 Johnny shoved me, slapped me, and grabbed me by my hair. When I tried to stand up, Johnny
4 muscled me back to the floor. He stood over me and yelled as I cried on the floor.

5 **March 2015, Australia:**

6 14. On March 3, 2015, I arrived in Australia to meet Johnny after I had been filming a
7 movie. It was the first time I had seen Johnny in about a month, and I noticed that Johnny had lost
8 a lot of weight and was behaving erratically. At some point in the next few days, I watched
9 Johnny pull out what I later found out was a bag of MDMA (ecstasy); even though Johnny was
10 supposed to be clean at that time, Johnny told me that I had not explicitly forbidden him from
11 taking ecstasy. The argument heated up, and Johnny pushed me, slapped me, and shoved me to
12 the ground before I retreated to a locked bedroom and went to sleep, as I was jet-lagged from the
13 travel.

14 15. When I woke up the next morning, I went downstairs to find that Johnny was still
15 awake, and that he had stayed up all night, having taken about eight MDMA pills. He was also
16 drinking again. We got into a fight that Johnny made physical, and I barricaded myself in one of
17 the rooms. That didn't stop Johnny from busting through the door of the room I was in. By
18 nightfall, Johnny had hit me multiple times, shoved and pushed me to the ground, choked me, and
19 spit in my face. Johnny then handed me a liquor bottle that he was drinking from, and asked me,
20 "What are you going to do?" I threw the bottle on the floor. Johnny responded by starting to
21 throw cans and unopened glass bottles at me. I wanted Johnny to go to sleep, in hopes that he
22 would sober up. Instead, he began to fight with me about our upcoming marriage. I observed as
23 Johnny then called multiple lawyers and representatives, including Tracey Jacobs, then his agent
24 at the United Talent Agency.

25 16. That night, Johnny shoved me into a ping pong table that collapsed underneath me.
26 Johnny threw bottles through the window panels of a glass door, breaking two panes, and leaving
27 glass everywhere. Johnny then grabbed me, gripping my body and nightgown. He tore the
28 nightgown off, and at some point, I was naked and barefoot, covered in alcohol and glass. Johnny

1 grabbed me by my hair and choked me against the refrigerator in the kitchen. I tried to stand
2 myself up but I was sliding around the glass-strewn floor and countertop. Johnny threw me away
3 from him, and I tried to run away as Johnny continued to throw objects and alcohol at me. In one
4 of the most horrific and scariest moments of this three-day ordeal, Johnny grabbed me by the neck
5 and collarbone and slammed me against the countertop. I struggled to stand up as he strangled
6 me, but my arms and feet kept slipping and sliding on to the spilled alcohol and were dragged
7 against the broken glass on the countertop and floor, which repeatedly slashed my feet and arms.
8 Scared for my life, I told Johnny, "You are hurting me and cutting me." Johnny ignored me,
9 continuing to hit me with the back of one closed hand, and slamming a hard plastic phone against
10 a wall with his other until it was smashed into smithereens. While he was smashing the phone,
11 Johnny severely injured his finger, cutting off the tip of it. I did not throw a vodka bottle—or any
12 other kind of bottle—at Johnny, nor did I cause that injury to Johnny's finger. Once I was able to
13 get away, I barricaded myself in an upstairs bedroom, and tried to go to sleep.

14 17. On the third day of Johnny staying awake without sleeping, I came downstairs to
15 find numerous messages Johnny had written to me around the house, on the walls and on my
16 clothes, written in a combination of oil paint and the blood from his broken and severed finger.
17 Johnny also urinated all over the house in an attempt to write messages. I was only able to capture
18 a few pictures of these messages because I had barricaded myself in my bedroom, even though
19 they had been spread all over the house. Attached hereto as Exhibit 7 are true and correct pictures
20 of messages Johnny had smeared in his blood and paint in the bathroom adjoining the bedroom I
21 had barricaded myself in.

22 18. By the time I got the security guards to come upstairs, it had been almost 24 hours
23 now since Johnny had cut off part of his finger. His team was worried about the blood he had lost,
24 and so he was rushed to hospital. Afterwards, I flew back to Los Angeles, and Johnny returned to
25 his separate house in West Hollywood. I had a busted lip, a swollen nose, and cuts all over my
26 body, which friends, family, medical professionals, and co-workers all witnessed. To this day, I
27 still have scars on my arms and feet from this incident. Attached hereto as Exhibit 8 is a true and
28 correct copy of a picture of scars that are still on my left arm from this incident.

1 **March 2015, Los Angeles, California:**

2 19. Later in March, 2015, Johnny and I were in Los Angeles, California. Johnny's
3 hand was still in a cast following the incident in Australia. After becoming enraged, he began to
4 destroy personal property all over the house, including my belongings in my closet. My sister
5 Whitney was there, so when Johnny lunged to hit me, Whitney placed herself between us. Johnny
6 turned his attention to Whitney, who was standing on the top of a flight of stairs, and moved on
7 her. Acting in defense of my sister, as I was scared for her physical safety, I punched Johnny in
8 the face to draw his attention away from her. That was the only time I ever hit Johnny. At that
9 point, house security intervened and separated us. Attached hereto as Exhibit 9 are true and
10 correct copies of a text message exchange Whitney had with Kevin Murphy (the house manager)
11 following that incident. Attached hereto as Exhibit 10 is a true and correct copy of excerpts of the
12 transcript of my deposition dated August 13, 2016, in which I previously testified under oath about
13 that incident. Attached hereto as Exhibit 11 is a true and correct copy of a video excerpt of that
14 deposition testimony.

15 20. After he attacked me and my sister in March of 2015, Johnny seemed to get clean
16 and quit using everything other than his prescription medications. For some months, things were
17 peaceful. Then, in July of 2015, Johnny started to drink wine and smoke marijuana again.

18 **August 2015, Thailand and Malaysia:**

19 21. In August of 2015, Johnny and I traveled to Southeast Asia. While on the Eastern
20 Oriental train, Johnny picked a fight with me, and started hitting and pushing me against a wall by
21 grasping my throat and holding me there. I remember being afraid that Johnny might not know
22 when to stop, and that he might kill me.

23 **November 26, 2015, Los Angeles, California:**

24 22. On November 26, 2015, which was Thanksgiving, Johnny and I were in Los
25 Angeles, and got into another physical fight. Johnny ripped my shirt, and threw me around the
26 room. He threw a wine glass and a heavy glass decanter at me, which luckily missed. At one
27 point, Johnny pushed me, and I fell over the back of a lounge chair and hit my head against a brick
28

1 wall. I later learned that I had gotten a sizeable lump on the back of my head, and that my lip had
2 busted open.

3 **December 15, 2015, Los Angeles, California:**

4 23. On the night of December 15, 2015, I had plans to meet with my friends Raquel
5 "Rocky" Pennington and Melanie at Johnny's and my penthouse in Los Angeles. Before they
6 arrived, Johnny picked another fight with me. He threw another decanter at me, knocked items
7 around the room, and punched the wall. He slapped me hard, grabbed me by my hair, and dragged
8 me from a stairwell to the office to the living room to the kitchen to the bedroom and then to the
9 guest room. In the process, he pulled large chunks of hair and scalp out of my head.

10 24. Hoping to avoid the violence, I tried to calm Johnny down, and then went upstairs
11 to try to remove myself from the situation. Johnny followed me, hit me in the back of my head,
12 grabbed me by my hair again, got in front of me on the steps, and then dragged me by my hair up
13 the last few steps. At the top of stairs, Johnny shoved me twice, which made me fear I would fall.
14 I told Johnny that he had broken my wrist in an attempt to get him to stop.

15 25. Johnny kept hitting me, and each time he knocked me down, I chose to react by
16 simply standing up and looking him in the eye. Johnny responded by yelling, "Oh, you think
17 you're a fucking tough guy?" He reeled back and head-butted me in my face, bashing my nose,
18 which immediately began bleeding, sending searing pain through my face. I instantly started
19 tearing up, and I thought that I would have to go to the hospital. I told Johnny I wanted to leave
20 him, and that I would call the police if he ever touched me again. When I began to walk away
21 toward the guest apartment, he responded by pushing me, then grabbed me and pulled me from
22 one room to the next, gripping me by my hair.

23 26. By the time Johnny had dragged me into the upstairs office, I told Johnny that I was
24 leaving him, since I could not put up with his behavior any longer. Johnny reacted by grabbing
25 me by my throat, pushing me down to the ground, and punching me in the back of my head. He
26 grabbed me by my hair, slapping me in the face, and screaming at me something like, "I fucking
27 will kill you – I'll fucking kill you, you hear me?" There were chunks of my hair everywhere and
28 indentations in the carpet where I was dragged.

1 27. At some point, the fight continued onto a bed. Johnny got on top of me with his
2 knee on my back and the other foot on the bedframe, while repeatedly punching me in my head,
3 and he screamed—as loudly as I’ve ever heard him scream—“I fucking hate you” over and over
4 again. The bedframe splintered under the weight of the pressure of his boot. Johnny hit me with
5 his closed fists, and I remember being unable to hear myself screaming because he had pushed my
6 face into the mattress. I screamed as loudly as I could, hoping Johnny would realize he was
7 severely hurting me. For a while, I could not scream or breathe. I worried that Johnny was in a
8 blacked-out state and unaware of the damage he was doing, and that he could actually kill me. To
9 this day, I do not know how the fight ended. Attached hereto as Exhibit 12 are true and correct
10 copies of photographs of the hair he pulled out of my head and the bedframe he splintered during
11 the course of this violent episode.

12 28. The first thing I remember after the fight was Rocky coming into my room, and
13 screaming “Oh my god! Oh my god! Oh my god!” as she saw me. Together with Melanie, who
14 had also arrived, we called Erin Boeurum, a nurse, who instructed us on how to conduct a
15 concussion check over the phone. I had severe headaches and other pain for at least a week
16 afterward.

17 29. I later learned, that when Rocky and Melanie arrived, broken glass and chunks of
18 hair were strewn across the downstairs of the penthouse. True and correct copies of pictures of my
19 injuries from that occasion are attached hereto as Exhibit 13.

20 30. Johnny also had written a message on the countertop in our kitchen in gold sharpie
21 that said, “Why be a fraud? All is such bullshit.” A true and correct copy of a picture of that
22 message is attached hereto as Exhibit 14.

23 31. That night, I texted my publicist Jodi Gottlieb (who lives in Los Angeles) to let her
24 know that I had been badly injured, and that I might not be able to make an appearance on the Late
25 Show that was scheduled for the following day depending on the extent of my bruising. I told her,
26 “I had an accident tonight Jodi. I’m really bruised and might have a black eye or two tmrw – same
27 with my nose. . . . But won’t know how bad the bruising is until the morning.” I told Jodi that I
28 had had an accident because, like many who experience abuse, I was afraid of exposing this aspect

1 of my relationship with Johnny to her or the world. A true and correct copy of the text message I
2 sent Jodi is attached hereto as Exhibit 15 (my message in white, Jodi's in blue). I asked Melanie
3 and Rocky to help cover up the bruises, bleeding, and swelling so I could make it to the Late Show
4 appearance without exposing Johnny.

5 32. A day or two later, I went to Dr. Kipper's office to get a concussion check follow-
6 up examination. Lisa Beane, the nurse who saw me followed me out to the parking lot, and told
7 me that she recognized that I "was in trouble," and advised me to call her if I was attacked again.

8 33. Attached hereto as Exhibit 16 are text messages I exchanged with Rocky a few
9 days later, on December 20 and 21, 2015, in which we discussed the attack from the night of
10 December 15, 2015 (my messages are in white, hers are in blue).

11 **April 21, 2016, Los Angeles, California:**

12 34. On April 21, 2016, I was hosting my own 30th birthday party at our penthouse.
13 Johnny arrived to the party late and inebriated, and, after our guests had left, we started to fight.
14 During the course of that fight, Johnny threw a magnum-sized bottle of champagne against the
15 wall, and shattered a glass against the floor. Johnny grabbed me by the shoulders, pushed me onto
16 the bed, and blocked the bedroom door when I tried to leave. He grabbed me by my hair, and
17 violently shoved me to the floor. I later applied for a domestic violence restraining order, and
18 cited that incident as part of the reason I was afraid of Johnny. His lawyers later deposed me and
19 asked about that incident. Attached hereto as Exhibits 17, 18, and 19 are true and correct copies of
20 excerpts of the transcript of my deposition dated August 13, 2016, in which I previously testified
21 under oath about that incident. Attached hereto as Exhibits 20, 21, and 22 are true and correct
22 copies of the video excerpts of that deposition testimony.

23 35. Johnny and I did not speak for a month after my birthday. Nonetheless, during that
24 month, I found myself unable to sleep through the night because I was afraid that Johnny would
25 come home and instigate a fight. I even inquired about the possibility of having my locks changed
26 because Johnny and his team had keys to the house, and I never knew when—or in what state—he
27 would come home.

28

1 **May 21, 2016, Los Angeles, California:**

2 36. On May 21, 2016, Johnny and I met at our home in Downtown Los Angeles to
3 discuss our relationship. His behavior was erratic, and as I felt increasingly unsafe, I texted Josh
4 and Rocky—who lived next door—to have them come over. I also called our mutual friend iO
5 Tillet Wright to mollify Johnny. Johnny started to scream at iO over the phone, left to go upstairs,
6 then came back downstairs and grabbed my phone, threatening iO and calling him names. At
7 some point, iO yelled at me to “get out of the house.” When Johnny heard that, he wound up like
8 a baseball pitcher and threw the phone in my face, as hard as he could. I yelled, “You hit my
9 face,” and started to cry. I had been sitting on the couch, cross-legged, and Johnny grabbed my
10 hair and started to slap, shake and yank me around the room while I continued to scream. I was
11 questioned about this topic during my August 13, 2016 deposition. Attached hereto as Exhibits 23
12 and 24 are true and correct copies of excerpts of the transcript of my deposition dated August 13,
13 2016, in which I previously testified under oath about that incident. Attached hereto as Exhibits
14 25 and 26 are true and correct copies of the video excerpts of that deposition testimony.

15 37. Rocky had a key to our penthouse, and let herself in. When she entered, Johnny
16 noticed, turned, and let go of me, allowing me to retreat to the corner sofa. Both Johnny and
17 Rocky ran toward me at the same time. Rocky threw herself in between Johnny and me, and
18 raised her arms. Johnny ran into Rocky, and pushed her arms down. She calmly planted herself
19 and said, “Stop, Johnny.” Johnny grabbed Rocky’s arms again and threw them to her sides. I
20 collapsed onto the couch, with Johnny standing over me. Johnny repeatedly screamed at me, “Get
21 the fuck up, Amber.” I did not move, and Johnny got closer, screaming “Get the fuck up, Amber”
22 about 10 times. At some point, Rocky got between us, and placed her arms over me protectively.

23 38. The door opened and someone yelled, “Boss! Boss!” Jerry Judge and Sean Bett,
24 Johnny’s private security guards, came in. Johnny stood up and then I stood up. I ran to the
25 corner of the room and said, “Jerry, he hit me, if he hits me one more time I’m calling the police! I
26 will call the police!” At the time, I did not realize that iO had been on speakerphone since Johnny
27 had thrown my phone at my face. I later learned that, at some point, iO had hung up and called
28 911.

1 39. Johnny smashed various objects around the house with a wine bottle as he left.
2 Josh—Rocky’s fiancé—entered and told Rocky and me to stay in PH 1 (the neighboring
3 Penthouse Josh and Rocky lived in). Josh met Johnny in the hallway, where they squared off.
4 Johnny did not touch Josh. Instead, Johnny smashed more items in the hallway, spilled wine
5 everywhere, and kicked a hole in a solid door. Johnny then demanded to be let into PH 5, my
6 apartment where all of my belongings were at the time. Either Jerry or Sean opened the door,
7 despite my repeated requests not to let Johnny in due to his longstanding history of destroying my
8 possessions when he would get angry. After entering, Johnny destroyed everything he could and
9 chased Liz Marz out of the penthouse carrying a wine bottle. He also destroyed all of Rocky’s
10 beads (which she used in her work) that were supposed to be used in her show the next day.
11 Johnny’s security guards stood by the entire time. Attached hereto as Exhibit 27 is a true and
12 correct copy of an excerpt of the transcript of my deposition dated August 13, 2016, in which I
13 previously testified under oath about Sean and Jerry’s inaction. Attached hereto as Exhibit 28 is a
14 true and correct copy of the video excerpt of that deposition testimony. Attached hereto as Exhibit
15 29 are true and correct copies of photographs of the aftermath of Johnny’s destruction that night.

16 40. At some point during Johnny’s destruction, while I was hiding in PH 1, I called my
17 attorney, Samantha Spector, with whom I had been consulting about my situation with Johnny, to
18 ask for her advice. I was afraid to give the police a statement that would create an international
19 media incident for either Johnny or me, and my instinct was still to protect Johnny and our
20 privacy. When the police officers arrived, I told them “I decline to give any statement at this time
21 as per the advice of my counsel.” The officers repeatedly requested that I cooperate by providing
22 a statement so that they could take action, but I declined. They did, however, conduct a search of
23 the apartments, which they insisted was necessary in order to ensure my safety. Attached hereto
24 as Exhibit 30 is a true and correct copy of an excerpt of the transcript of my deposition dated
25 August 13, 2016, in which I previously testified under oath about that interaction. Attached hereto
26 as Exhibits 31 is a true and correct copy of the video excerpt of that deposition testimony.

27 41. During this time, I also texted Melanie. Attached hereto as Exhibit 32 is a true and
28 correct copy of the text exchange between us that night (my messages in white, hers in blue).

1 42. Attached hereto as Exhibit 33 are true and correct copies of photographs of the
2 injuries I sustained on May 21, 2016, which were taken between May 21 and May 28, 2016.

3 **May 27, 2016, Los Angeles, California:**

4 43. After the May 21, 2016 attack, I resolved to leave Johnny for good. I filed a
5 request for a domestic violence restraining order in Los Angeles Superior Court. Attached hereto
6 as Exhibit 34 are true and correct copies of the Application for Domestic Violence Restraining
7 Order, the Declaration of Amber Laura Depp, the Declaration of Raquel Rose Pennington and the
8 exhibits thereto, and the Declaration of Samantha F. Spector, Esq. Re Ex Parte Notice and In
9 Support Of Petitioner Amber Laura Depp's DVRO Request, all of which were filed on May 27,
10 2016.

11 44. On May 27, 2016, I appeared in Court for a hearing on my request for a domestic
12 violence restraining order. At that time, I was still bruised following Johnny's violent attack six
13 days prior. The Court granted the domestic violence restraining order against Johnny. Attached
14 hereto as Exhibit 35 is a true and correct copy of the Court's Notice of Hearing and Temporary
15 Restraining Order filed on May 27, 2016.

16 **June 2016, Los Angeles, California:**

17 45. In June of 2016, the media began reporting that there were individuals who claimed
18 to have witnessed me between May 21, 2016 and May 26, 2016, and claimed that I did not appear
19 to have been injured. Others claimed that my injuries were faked based on photographs I had
20 taken, in which my bruises had been deliberately covered using my hair. Of course, as I already
21 mentioned, other photographs that were taken of me during that time period show my injuries.
22 Likewise, multiple people I saw at personal and private events noticed my injuries and inquired
23 whether they could help, but also told me they could not comment publicly because they had
24 reason to fear that they would lose their job or livelihood if they cooperated with me.

25 46. As part of Johnny's defense in my divorce lawsuit, his lawyers claimed that I was
26 arrested for a domestic physical altercation with my former wife, Tasya van Ree. That account
27 was deliberately misleading, since the police released me with no charges ever being brought. Ms.
28 van Ree has publicly contradicted the media reports generated by Johnny's team, and said, "In

1 2009, Amber was wrongfully accused for an incident that was misinterpreted and over-
2 sensationalized by two individuals in a power position. I recount hints of misogynistic attitudes
3 toward us which later appeared to be homophobic when they found out we were domestic partners
4 and not just 'friends.' Charges were quickly dropped and she was released moments later. It's
5 disheartening that Amber's integrity and story are being questioned yet again. Amber is a brilliant,
6 honest and beautiful woman and I have the utmost respect for her. We shared 5 wonderful years
7 together and remain close to this day." A true and correct copy of a June 8, 2016 article that
8 appeared on E! Online recounting Ms. van Ree's statement is attached hereto as Exhibit 36.

9 47. On June 6, 2016, iO Tillet Wright—who was on the phone with Johnny and me
10 during the May 21, 2016 fight and called 911—reacted to one of these media accounts on Twitter.
11 iO's Twitter handle is "iOlovesyou." Attached hereto as Exhibit 37 are true and correct copies of
12 the five tweets iO posted on June 6, 2016.

13 48. On June 13, 2016, iO filed a declaration with an accompanying exhibit. Attached
14 hereto as Exhibit 38 is a true and correct copy of the Declaration of iO Tillet Wright and the
15 exhibit thereto.

16 **January 13, 2017, Los Angeles, California:**

17 49. After I obtained the restraining order against Johnny, we proceeded to dissolve our
18 marriage. A true and correct copy of the Stipulated Judgment of Dissolution of Marriage, entered
19 on January 13, 2017, is attached hereto as Exhibit 39.

20 **December 2018, Los Angeles, California:**

21 50. Following my highly-publicized separation from Johnny, I read accounts in the
22 media referring to me as a victim of domestic violence. In response, many people called me a liar
23 (without ever hearing my story). I was dropped from a global fashion brand's upcoming
24 campaign. I lost a part for a movie in which I had already been cast. People I have never met or
25 spoken to threatened me with violence. I received so many death threats I had to change my
26 phone number on a near-weekly basis.

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1 51. People accused me of having abused Johnny. That simply is not true. I never
2 attacked Johnny other than in self-defense (and in defense of my little sister). I have never
3 physically abused anyone. I know what that does to people.

4 52. Instead, I have attempted to promote good in the world and to advocate an end to
5 domestic violence. I have sought to use my public persona to speak out on an issue that was
6 extremely meaningful to me and millions of other women and men every year. I have spoken out
7 about violence in public, but I have always avoided specifically referencing Johnny, or recounting
8 his violence against me, not only because I wanted to move past that phase of my life but also
9 because I was constrained by the terms of a strict confidentiality agreement that Johnny had
10 insisted upon as part of our divorce settlement.

11 53. In early December 2018, while working with the American Civil Liberties Union as
12 the ACLU Ambassador for Women's Rights, I learned of an opportunity to write an Op-Ed about
13 women's rights issues. I agreed to do so.

14 54. I wrote the Op-Ed in Los Angeles, California, and submitted it to the Washington
15 Post through my contact at the ACLU, who was based in New York. The Op-Ed was published
16 on December 18, 2018.

17 55. I do not believe I ever even spoke to an editor for the Washington Post, nor did I
18 ever travel to Washington, D.C. or Virginia in connection with the Op-Ed. I never knowingly
19 contacted any employee of the Washington Post who worked from the Washington Post's Virginia
20 office. Nor did I discuss with any Washington Post employee whether or not the Op-Ed would be
21 published in any particular metro edition of the newspaper.

22 56. To the best of my knowledge, I have never traveled to Virginia in my life.

23 Executed this 10 day of April 2019, at Los Angeles, California.

24 I declare under penalty of perjury under the laws of the State of Virginia that the foregoing
25 is true and correct.

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27
28


Amber Laura Heard