

Claim No.: QB-2018-006323

**IN THE HIGH COURT OF JUSTICE
QUEEN'S BENCH DIVISION
MEDIA AND COMMUNICATIONS LIST**

B E T W E E N

JOHN CHRISTOPHER DEPP II

Claimant

and

**(1) NEWS GROUP NEWSPAPERS LTD
(2) DAN WOOTTON**

Defendants

WITNESS STATEMENT OF TARA ROBERTS

I, **TARA ROBERTS** of **LITTLE HALLS POND CAY, EXUMA, BAHAMAS** will say as follows:

1. I have worked for the Claimant as his Estate Manager on his Bahamian island property since December 2008.
2. I confirm that save where otherwise appears the facts stated in this witness statement are within my own knowledge and that those facts are true to the best of my knowledge and belief. Where facts are not within my own knowledge, I confirm that they are true to the best of my information and belief and the source of that information is set out.
3. I make this witness statement in support of the Claimant's claim in these proceedings.
4. I do not know the full details of the Claimant's claims against the Defendants in these proceedings.

5. I confirm this witness statement was obtained through a combination of material taken from the declaration I provided in June 2019 for use in the US libel claim brought by the Claimant against his ex-wife Ms Amber Heard, which addresses many of the same facts.
6. I am aware of the violence allegations that have been made publicly for the last few years by Johnny Depp's ex-wife Ms Amber Heard.

My experience of Johnny and Amber's relationship

7. I never saw Johnny, who is an unusually kind man, be violent or aggressive with Amber or anyone else. I observed in December 2015 to my colleagues that Amber was a "thrower", someone who threw projectiles. I also witnessed Amber lunge violently at Johnny, pull his hair, and commit other aggressive physical acts against him as well as the visible aftermath of the incidents outlined in this statement.
8. Prior to Johnny's marriage to Amber, he was outgoing, friendly and social; it was a family environment when he would visit the Island. Throughout their relationship and marriage there was a distinct change in Johnny, and the once social and animated person spent most days sleeping, became withdrawn, and our meals together dwindled to non-existent. General socialization or just moments to discuss island issues stopped as she would randomly show up. Very rarely were we allowed to be alone with him, as she would "wiggle" her way into the discussions.

Events of August 2014

9. I am aware that Amber has claimed in court documents that Johnny violently attacked Amber on the Island on 17 August 2014 and that

Johnny kicked and broke a door. First, there was no door broken, or damaged during that visit or any other. There was no broken anything. If there was, I would know it as part of my job, on an island on which I live full time. Second, Johnny, Amber and Debbie Lloyd, a registered nurse, arrived on the island on 8 August 2014 and Johnny left later that year. There was nothing out of the ordinary that happened during this visit. Nor did I even witness a moment of discord, on a tiny island.

Events of December 2015

10. During the evening of 29 December 2015 Johnny drove to the office alone in his John Deere Gator. He had said he just needed to get away from Amber. Shortly after, Amber showed up to the office. Amber started pleading with him to come back to the house, and at that point I walked out of the office. A few minutes later I heard his vehicle start and I stepped outside. Amber was standing in front of the vehicle, screaming at him and apparently not letting him get away by blocking his path. Then she climbed into the vehicle he drove her back to their house. I got in my golf cart and went to the Café, which is a short distance from the house. I called Christi Dembrowski, Johnny's sister, as I was unsure how far this would go.
11. While I could not hear what caused the fight, Amber repeatedly berated him with increasing ferocity. She was insulting him, calling him names, and in the middle of this onslaught I heard her say specifically "your career is over," "no one is going to hire you," "you're washed up," "fat," "you will die a lonely man," and also screaming things that were incomprehensible.
12. At some point Johnny tried to leave again as they were now in the parking lot. He repeatedly asked for the key for the vehicle, which she had taken out, refused to give back to him, and which we later found in

the house. He was responding to her verbal attacks by saying “go away” and “just leave me alone.” Amber’s screaming and berating rose to a fever pitch, and Johnny continued to yell “go away” and “leave me alone.”

13. I asked Christi what I should do, and she said I should keep an eye on the situation. As Amber’s rage continued to escalate, and I described the scene to Christi, she said that I needed to intervene and I should go to Johnny’s assistance.
14. I hung up and immediately ran to the parking lot. I saw Amber lunge at Johnny, clawing, tugging and aggressively pulling him. He continued to stand there yelling at her to stop and leave him alone. When he stepped back to leave, her onslaught would start again. During this entire incident, I never saw Johnny hit Amber, or push her back, nor did he physically react to the attacks. She would calm down and hug and apologize. Then he would say he needs to leave and it would start again. Finally, I stepped between them. She continued to reach for him but maybe my presence stopped it.
15. I walked him to the Café and he laid on the couch and that is when I saw that he now had a red, swelling gash on the bridge of his nose. Amber, Johnny then told me, had thrown a quart sized can of lacquer thinner into Johnny’s face, causing a gash.
16. The next morning, the bushes around their house were filled with art supplies that had been thrown including paintbrushes, paint tubes, and the deck was stained with the thinner. There was no damage to the house and she made no mention to me of what had transpired the night before and into the morning.

17. Amber had also removed her wedding ring and thrown it and had asked for help finding it as they were leaving that afternoon. It was found and returned to her.
18. Amber was makeup free and unmarked throughout this Christmas visit to the Island, as she was usually makeup free when on the Island. I never saw her with any sign of injury on her face or body whatsoever.
19. During this visit in Christmas 2015 Amber had a photographer on the island to conduct a photo shoot. We did not know this was happening nor did Johnny's children. My recollection is that the photographer, Greg Williams, who arrived on 27 December 2015 with his partner, took photographs the day after Amber's rampage, during departure, of an uninjured Amber, and of Johnny, who had a visible gash on the bridge of his nose.
20. Also present on the Island during this late 2015 visit was Johnny's son, daughter and his daughter's friend. Johnny's children did witness the aftermath of the events of 29 December, as I got them that morning, explained to them what had happened and took them to their father.
21. When Amber would depart the Island, she would always leave a considerable number of personal belongings behind. When she left the Island on 31 December 2015, she took everything she owned with her. When we did our usual post-visit clean up, I made the observation to the other employees that all Amber's belonging and toiletries were no longer in the house.

STATEMENT OF TRUTH

I believe that the facts stated in this witness statement are true. I understand

