

On behalf of: Claimant  
Witness: Alejandro Romero  
No: First  
Date: 12 December 2019

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

**Claim No. HQ18M01923**

**JOHN CHRISTOPHER DEPP II**

**Claimant**

**-and-**

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

**Defendants**

---

**FIRST WITNESS STATEMENT OF  
ALEJANDRO ROMERO**

---

I, **ALEJANDRO ROMERO**, of [REDACTED] Los Angeles, California, 90014 **WILL SAY** as follows:

1. I provide Security and Concierge services at the Eastern Columbia Building, 849 South Broadway, Los Angeles, California, 90014 ("**the Eastern**"), a private residential building. I have been employed by the Eastern for approximately nine years. This is my first witness statement in these proceedings.
2. Unless stated otherwise, the facts and matters referred to in this witness statement are within my own knowledge and true or are true to the best of my knowledge, information and belief based on sources stated within this witness statement.

On behalf of: Claimant  
Witness: Alejandro Romero  
No: First  
Date: 12 December 2019

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. However, I have been told that the Defendants allege that the Mr Depp physically abused his former wife, Ms Amber Heard, on May 21, 2016.
5. I know Mr John Christopher Depp II to be a resident of the Eastern. I have never spoken with Mr Depp in relation to his personal life and I do not know Mr Depp outside of my duties for the Eastern.
6. I know Ms Amber Heard to be a resident of Penthouse 3 of the Eastern. I saw Ms Heard at the Eastern for the first time in around July 2015 but I understand that she was not resident at the Eastern until around March 2016. I frequently saw Ms Heard both in person and on security footage in the course of my duties. I have never spoken with Ms Heard in relation to her personal life and I do not know Ms Heard outside of my duties for the Eastern.
7. My interaction with Ms Heard was limited to brief interactions about logistical matters with the apartments, including, for example, giving access to guests of Ms Heard. From March 2015 onwards, Ms Heard was visited regularly late at night, at around 11:00 pm to midnight, by Mr. Elon Musk. For his initial visits, I would receive a call from Ms Heard who would tell me to give Mr. Musk access to the garage for the building and then send him up to the penthouse. After he had made a few visits, Ms Heard provided Mr. Musk with his own garage remote and a fob to Mr. Depp's penthouse. I believe he visited Ms Heard a few times a week and he would always visit when Mr Depp was not at home.
8. My duties at the Eastern include checking visitors in, processing mail and ensuring the safety of the building, including making rounds of the building and monitoring security footage. My regular working hours are 4.00 p.m. to 1.00 a.m. from Monday to Friday. However, I occasionally work overtime when the garage gate malfunctions and there is no one else to stay overnight. Otherwise, there is no 24-hour security on site at the Eastern during the week.

**I. Saturday, May 21, 2016**

9. I understand that it is alleged in the Defendants' Amended Defense that on Saturday, May 21, 2016, Mr Depp committed a number of acts of domestic violence against Ms Heard. I am aware that the police responded to the Eastern on that date, in connection with a call relating to Ms Heard's unit, Penthouse 3. I was not on duty at the front desk at any time on this date. Ms Trinity Esparza, the front desk supervisor at the Eastern, mentioned that a call had been made to the police, but we did not discuss this further. I have never spoken with Mr Depp or Ms Heard about the incident.

**II. Wednesday, May 25, 2016**

10. On Wednesday, May 25, 2016 I was working at the front desk of the Eastern during my regular working hours. At approximately 10.30 p.m. Ms Heard walked into the lobby accompanied by Ms Raquel Pennington. I know Ms Pennington to be a resident at Penthouse 1 of the Eastern and a friend of Ms Heard.
11. Ms Heard approached me to ask for the key to her unit, which I gave to her. We did not discuss anything else at this time. Ms Heard stood approximately three feet away from me during our conversation. I did not notice any bruises, cuts, swelling, red marks or any other injuries of any kind to Ms Heard's face.
12. Following our conversation Ms Heard walked to the front of the lobby to make a phone call. She did not go outside. During this time, Ms Pennington and I discussed her dog. Ms Pennington also mentioned that she thought that somebody had been trying to enter the units at Penthouse level earlier that day, but did not elucidate any further information. Ms Pennington appeared concerned by this.
13. Once she had finished her phone call, Ms Heard asked me to search the Penthouse to check that no one was there and that it was safe. Between approximately 10.30 p.m. and 11.30 p.m., I searched Penthouse 1 and Penthouse 5, accompanied by Ms Heard and Ms Pennington. I

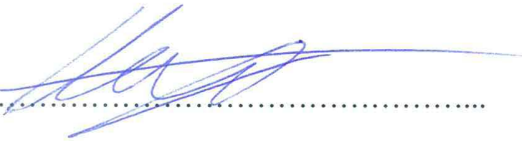
On behalf of: Claimant  
Witness: Alejandro Romero  
No: First  
Date: 12 December 2019

understand Penthouse 5 to belong to Mr Depp. During my search, I did not see any other person or anything to cause concern, at any point. Following this I returned to the front desk.

14. I do not recall seeing Ms Heard on any other day during the week commencing May 23, 2016.

On behalf of: Claimant  
Witness: Alejandro Romero  
No: First  
Date: 12 December 2019

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

Signed: .....

**Alejandro Romero**

Date: 12 December 2019

On behalf of: Claimant  
Witness: Alejandro Romero  
No: First  
Date: 12 December 2019

**Claim No. HQ18M01923**

**IN THE HIGH COURTS OF JUSTICE  
QUEEN'S BENCH DIVISION  
MEDIA AND COMMUNICATIONS LIST  
BETWEEN:**

**JOHN CHRISTOPHER DEPP II**

**Claimant**

**- and -**

**(1) NEWS GROUP NEWSPAPERS LTD**

**(2) DAN WOOTTON**

**Defendants**

---

**FIRST WITNESS STATEMENT OF  
ALEJANDRO ROMERO**

---

Brown Rudnick LLP  
8 Clifford Street  
London W1S 2LQ  
T: +44 20 7851 6000  
**Solicitors for the Claimant**

Ref: NPM/OB/034692.0002  
nmicklethwaite@brownrudnick.com  
obischof@brownrudnick.com  
telton@brownrudnick.com