

photographic that directly refute Ms. Heard's domestic violence allegations against me and other false assertions. The appearance of new evidence not previously in my possession was the impetus for my bringing this lawsuit because, after years of asserting my innocence, I am finally in a position to prove it by dismantling each element of her hoax. I set forth this evidence in detail below.

4. When confronted with direct evidence that exposes her domestic violence claims as a poorly executed yet surprisingly effective hoax, Ms. Heard responded by weaving more fantastical lies to prop up her false narrative that she is a domestic violence victim. Those lies too cannot withstand scrutiny and clear evidence. Ms. Heard's false narratives are dependent on the "evidence" of her word and that of her perjurious, co-conspirator friends who have chosen to assist her in her hoax. Those lies are internally inconsistent, shifting, and directly contradicted by overwhelming sworn testimonial, photographic, audio, video, and other evidence. And Ms. Heard has a documented history, of which I will submit evidence herein, of violence against men and women, of lying to courts and government agencies, and of suborning and attempting to suborn the perjurious testimony of third parties to deliver to courts.

5. Notwithstanding Ms. Heard's false domestic abuse allegations about me, there was actual, documented domestic violence in our relationship: she was the perpetrator, and I was the victim. While mixing prescription amphetamines and non-prescription drugs with alcohol, Ms. Heard committed innumerable acts of domestic violence against me, often in the presence of third party witnesses, which in some instances caused me serious bodily injury. Multiple of these commissions of violence against me she has even admitted to under oath. Multiple episodes of her violence against me are documented and supported by objective evidence, which I set forth below.

### **Ms. Heard's Well-Documented History And Prior Arrest For Domestic Violence**

6. Ms. Heard was arrested in Seattle-Tacoma International Airport in 2009 after police officers observed her committing domestic violence against her then-wife Tasya Van Ree. Ms. Heard's wife asked police to arrest Ms. Heard. The King County prosecutor declined to charge Ms. Heard only because neither she nor her victim were residents of King County, Washington, but not before Ms. Heard spent a night in jail and appeared before a judge in court. Ms. Heard lied about this domestic violence incident under oath, saying "it was a trumped up charge and it was dropped immediately for being such." Ms. Heard also subsequently tried to minimize this arrest for domestic violence to the media, claiming that the police officers were "homophobic" and "misogynists." In fact, the arresting officer was a female, self-described lesbian activist who has publicly disputed Ms. Heard's claims about the circumstances of her arrest. See <https://www.tmz.com/2016/06/07/amber-heard-domestic-violence-arrest-partner-tasya-van-ree/>; see also <https://people.com/movies/amber-heards-arresting-officer-speaks-out-i-am-so-not-homophobic/>

7. Throughout our relationship, Ms. Heard also committed domestic violence against me. She hit, punched, and kicked me. She also repeatedly and frequently threw objects into my body and head, including heavy bottles, soda cans, burning candles, television remote controls, and paint thinner cans, which severely injured me. As part of our divorce case, Ms. Heard was deposed on or about August 13, 2016. Ms. Heard admitted to some of these acts of violence against me in her deposition, although in the cherry-picked, sworn deposition snippet she submitted to this court, she also contradicted her own sworn admissions and further perjured herself by saying she only committed violence against me one single time. Excerpts of Amber

Heard's depositions are attached here as Exhibit A. Ms. Heard also admitted under oath to throwing a can of paint thinner into my head in front of witnesses:

Q: Isn't it true, Ms. Heard, that in front of two different employees at the island you threw the paint thinner and hit him in the head on December 15th?

...

A: Oh, that's true... Exhibit A.

8. There also is an audio recording in which Ms. Heard admits to and apologizes for kicking a door into my head and punching me in the face. After first denying these acts of violence under oath in her deposition, Ms. Heard was forced grudgingly to concede that she did perpetrate the violence against me that she can be heard admitting to only after being confronted with the audio recordings of her confession and apology. Excerpts of Amber Heard's depositions are attached here as Exhibit A.

9. Many people who worked for Ms. Heard and me during our marriage also observed firsthand her violence against me or observed me with injuries that she inflicted upon me immediately after the fact, which in some instances they felt compelled to document by taking photographs of my injuries. Many of them have provided sworn statements attesting to the violence they witnessed Ms. Heard commit against me.

10. Attached here as Exhibit B is a photograph of me with a black eye caused by Ms. Heard punching me in the face on or about April 22, 2016. This photograph was taken by my bodyguard Sean Betts, who is a former 18 year veteran of the LA Sherriff's Department, on April 22, 2016.

11. Attached here as Exhibit C are three photographs of me with scratches on my cheek, chin and nose from an incident that took place on December 15, 2015. These

photographs were taken by Sean Bett at his insistence. Following a pattern she deployed throughout our relationship, Ms. Heard later perversely claimed it was I who committed violence against her on December 15, 2015, splitting her lip, bashing her in the nose so hard it nearly broke, blackening both her eyes and beating her so violently that she claimed I broke the bed in the process. Her account is disputed by multiple witnesses who each provided sworn testimony that they engaged face to face with a makeup-free and clearly uninjured Ms. Heard the following day, December 16, 2016, immediately prior to her appearance on the "James Corden" show, which can also be viewed to see the severe injuries she claims are a lie. These witnesses include Ms. Heard's own stylist Samantha McMillen, who also testified to witnessing Ms. Heard visibly uninjured on other occasions when Ms. Heard claimed I had beaten her.

12. One of Ms. Heard's attacks caused me grave bodily injury. While I was in Australia filming a movie approximately one month after I married Ms. Heard, on a day where my then-lawyer tried to discuss with Ms. Heard the need that she sign a post-nuptial agreement with me, she went berserk and began throwing bottles at me. The first bottle sailed past my head and missed, but then she threw a large glass vodka bottle. The bottle struck the marble countertop where my hand was resting and exploded. The projectile's impact shattered the bone in my finger and entirely severed the tip of my finger. Attached as Exhibit D is a photograph of my finger. I had to have 3 surgeries to reconstruct my finger and contracted MRSA three times. I feared that I would lose my finger, my arm, and my life.

13. To conceal the fact that her domestic violence against me caused me grievous bodily injury, Ms. Heard has concocted various, shifting, false stories claiming that I cut off my own finger. First, in the midst of our divorce case, Ms. Heard caused to be leaked to the media a fake story that I cut off my finger by punching a hole in a wall. Now, Ms. Heard has crafted a



new, but equally fake, story that I cut off my finger by smashing a plastic phone to smithereens while violently beating her in a “three-day ordeal.” Neither of these stories is true. I did not beat Ms. Heard in Australia at any time; nor did I cut off my own finger and shatter the bones. The truth is that Ms. Heard threw a glass vodka bottle at me, and the bottle smashed on the marble countertop where my hand was resting. The impact and the broken glass shattered the bone and cut off the end of my finger. To cover for Ms. Heard, I told the emergency room doctor that it happened in “an accident.” The doctor knew better, and told me: “this is a wound of velocity.”

14. Unfortunately, Ms. Heard’s pattern of violence and abuse extends beyond me. Several women who have been in a relationship with Ms. Heard have come forward to share their personal experiences of brutal violence and other abuse at the hands of Ms. Heard. My advisors have and continue to interview these victims, who remain deeply fearful of Ms. Heard, and to collect evidence from these victims.

15. On May 21, 2016, I went to a penthouse in the Eastern Columbia Building that I owned and shared with Ms. Heard. We had not spoken for a month.

16. Our last interaction had been at my penthouse on April 21, 2016, and involved an enraged Ms. Heard physically attacking me because I was late to her birthday dinner that I threw for her and her friends. My lateness had been due to an important business meeting, of which Ms. Heard was aware. Among other violent acts, Ms. Heard punched me repeatedly in the face as I lay in bed reading after the party, leaving me with an egg shaped swelling under my left eye. A photograph of my injured face following her April 21, 2016 attack is attached as Exhibit B. This photograph was taken by Sean Bett on April 22, 2016 after I returned to my West Hollywood home.

17. After I removed myself from Ms. Heard's presence in the penthouse on April 21, 2016, the following morning Ms. Heard or one of her friends defecated in my bed as some sort of a sick prank before they left for Coachella together. Indeed, our Estate Manager Kevin Murphy told me (and later testified under oath) that Ms. Heard admitted to him that the feces was "just a harmless prank." As a result of the years of domestic abuse I had suffered at the hands of Ms. Heard—most recently the April 21 physical attack and defecation on my bed sometime before she and her friends left the next morning—I resolved to divorce Ms. Heard. I went to pick up my things on May 21, 2016, and also resolved to tell her that I was divorcing her. I arrived at the penthouse in the early evening, and brought my two security guards Jerry Judge and Sean Bett as a precautionary measure, asking them to wait just outside the door of penthouse 3. It appeared that Ms. Heard was alone in the penthouse, although according to witness interviews, she was not. Her friend Raquel Pennington was hiding somewhere in the penthouse, although Ms. Pennington later falsely testified that she was summoned by Ms. Heard by text to Penthouse 3 at 8:06 PM, one of their many concocted lies. After I entered and went upstairs to collect personal belongings, Ms. Heard and I called our then-Estate Manager Kevin Murphy together and I asked Mr. Murphy to repeat to Ms. Heard what he had told me about her admission that the defecation in my bed was "just a harmless prank." Upon hearing Mr. Murphy's recount her admission, she went berserk and started screaming and cursing at Mr. Murphy, prompting Mr. Murphy to ultimately hang up the phone. Before he hung up, I told Ms. Heard that I intended to divorce her. She insisted on calling her friend iO Tillett Wright, who had been living rent-free in my properties for years, to try to explain away the feces that she left in my bed.

18. Ms. Heard put iO Tillett Wright on speakerphone. I had no interest in speaking with Mr. Tillett Wright. Nevertheless, both iO Tillett Wright and Ms. Heard had their chance to

badger me, mock me and deny the defecation incident (of which there were multiple sworn eyewitnesses and photographs) as a figment of my imagination. Hearing enough, I took the phone from Ms. Heard. I said into the phone to iO Tillett Wright: "I don't care, it's over." I flipped the phone onto the sofa, and it landed about 4 feet away from where Ms. Heard was sitting. And indeed, even Ms. Heard admitted this occurred in just this way, testifying "he, you know, like tossed it [the phone] on -- in --- tossed it in my direction or something on the table or on the couch." After tossing the phone onto the sofa, I turned around and walked to the other end of the open floor plan room, to the island in the kitchen, approximately 20 feet away from Ms. Heard. Ms. Heard immediately started loudly proclaiming that I had thrown the phone at her and hit her in the face, and screaming "Johnny stop hitting me." I turned to look at Amber trying to understand what was happening. Suddenly, Ms. Pennington comes out of nowhere and runs towards Ms. Heard from behind me and yells: "don't do it, stop it, leave her alone." Because she came from the direction of the front door, and did not come past my security guards outside, she could only have been hiding in the closet, waiting for the signal. Ms. Pennington's ex-husband who was present in penthouse 5 advised that Ms. Pennington lied about being summoned by Ms. Heard at 8:06 by text, because Ms. Pennington was in fact hiding in my penthouse 3 all along. I was shocked and immediately denied this absurd allegation because I had neither thrown the phone at her, nor hit her, nor touched her, nor was I physically anywhere near her. Ms. Heard did not know that my two security guards were posted immediately outside the door of the penthouse. I had asked them to accompany me in case she became violent. At the first sound of her screaming, they rushed inside the penthouse in a second. The two guards surprised Ms. Heard with their entrance, and indeed she appeared shocked. They witnessed her saying "stop

hitting me,” as I stood 20 feet away from her. She then changed her screams and speaking tense to “you better not hit me again!”

19. Although both Ms. Heard and iO Tillett Wright have testified, under penalty of perjury, that Ms. Heard screamed “called 911” and iO Tillett Wright claimed he called 911 instantaneously “to save Amber’s life,” and although Ms. Heard testified under oath that the police arrived just a “few minutes later” after I was seen on surveillance video leaving the building at 8:29 PM, LAPD logs show that 911 was not called until 10:07, 1 hour and 38 minutes after I departed the Eastern Columbia Building. Amber Heard’s and her friend iO Tillett Wright’s sworn 911 call testimony, like the rest of their testimony and hoax, was simply a lie. To further the hoax, iO Tillett Wright even wrote and published a piece in Refinery 29 titled “Why I Called 911.” Mr. Tillett Wright claimed in his article that “when I [he] was on the phone” with Ms. Heard listening to what he claimed was the sounds of violence, he decided to call 911 and “invite the police into the situation ... in a split second.” But LAPD records show this all to be a lie to support the bigger lie. After being confronted by the public on Twitter regarding the gross inconsistencies of his and Ms. Heard’s testimony when held up against the LA Police Department 911 call logs, iO Tillett Wright decided to change his story again and come up with an entirely new story, absurdly posting on May 16, 2019 “I was in nyc when I called 911, which put me through to NYPD. They said they’d have it passed through to LAPD but I worried it wouldn’t be fast enough, so I asked a friend in LA to call anonymously.” In addition to his perjury-explaining, newly concocted, anonymous 911 caller, disproven by the Police Department’s own record that the 911 caller was “Jo Wright” (not as he now was bizarrely claiming, some new, mystery friend) and his and Ms. Heard’s own testimony claiming



the same, Mr. Tillett Wright also tweeted that the inexplicable time gap could somehow vaguely be the fault of the New York Police Department.

20. As Ms. Heard screamed first that I had hit her and then that I better not hit her again, I yelled back that she [Ms. Heard] was crazy, and that I did not touch her, as I had not. My two security guards were both eyewitnesses to this incident, and have testified under oath to it. An excerpt of a deposition given by Ms. Pennington is attached as Exhibit E, in which even she admits that at the time of the incident, I immediately denied hitting Ms. Heard. Ms. Pennington also admits in her deposition that she never saw me hit Ms. Heard. That portion of her deposition is attached as Exhibit E. It is accurate that Ms. Pennington never witnessed what did not happen, but her testimony that she was not present throughout most of Ms. Heard's abuse hoax is a lie, and both other eyewitnesses have so testified that she was present and standing with Ms. Heard by the sofa as soon as Ms. Heard started play-acting abuse. Ms. Heard asserted in her deposition that from the time I left until the "few minutes later" when police arrived, she called and was on the phone with her lawyer. This period was demonstrably not a "few minutes" but in fact nearly 2 hours, according to the surveillance footage of my departure and police logs attached as Exhibits F and G. And a witness who was present in the room after I left described a scene where, guided by Ms. Heard's divorce lawyer on the phone, the co-conspirators got their hoax story straight and were instructed to each "write it down" before 911 was dialed quite some time later.

21. Stunned by the faked abuse allegations, I left penthouse 3 and walked down to my penthouse 5. In penthouse 5, I was shocked to see some sort of bead making, arts and crafts operation littering and strung across the room, along with Raquel Pennington's then-boyfriend Josh Drew, a dog, and a woman I did not know. Based on her later deposition testimony

supporting Ms. Heard's abuse hoax, I later learned that the woman was Ms. Heard's friend Elizabeth Marz, who also lived rent-free in my property. I told Josh Drew and Elizabeth Marz to get off my premises immediately. Then I left the Eastern Columbia Building with my two security guards and returned to my home in West Hollywood. Surveillance footage from the Eastern Columbia Building shows me boarding the penthouse elevator, riding downstairs, and exiting the elevator at 8:29 pm on May 21, 2016.

22. My recollection is that I left Los Angeles, California the following day, May 22 for rehearsals on the east coast. From there I traveled to Europe to tour with my band the Hollywood Vampires, without returning to Los Angeles. I did not return to Los Angeles until late June or early July of 2016.

23. I understand that Ms. Heard claimed under penalty of perjury that her friend, iO Tillett Wright, urgently called 911 in the middle of the hoax fight she absurdly concocted on the evening of May 21, 2016. This 911 call, according to Ms. Pennington's testimony, would have occurred right around 8:06 PM. Both Mr. Wright and Ms. Heard claimed under oath that Mr. Wright was on the phone with Ms. Heard and heard Ms. Heard screaming for someone to call 911 because I was violently attacking her. Ms. Heard claimed under oath that I "wound up my arm like a baseball pitcher" and threw her cell phone into her face as hard as I could from point blank range, "with great aim," and then pulled her hair and further battered her face "with some appendage" of my body. All of these hoax allegations are demonstrably false.

24. Mr. Wright vividly claimed, under penalty of perjury in documents submitted to a court to obtain a temporary restraining order against me, that he called 911 in the middle of this concocted violent fight to "save Amber's life."

25. Ms. Heard and Ms. Pennington also later claimed, in a deposition under the penalty of perjury, that I destroyed two of my own penthouses and the adjoining hallway by picturesquely swinging a magnum-sized bottle of red wine like a baseball bat. Ms. Pennington testified that *“they have a big island in the middle of the kitchen and on there, there’s candles and like fruit and, you know, glass – like jars and vases and things like that. And he just was hitting everything with the wine bottle, just smashing it all off. So there was fruit on the floor, and baskets and, you know, glass bottles and flowers.”* See Exhibit E. Ms. Heard similarly testified under oath: “Penthouse 5 was destroyed.” Exhibit A. So that is two destroyed penthouses they testified to. This vivid scenario they described never happened, and the “crime scene” they invented is just one more disprovable lie, in this instance dismantled by the sworn testimony of the two responding police officers. The female and male domestic abuse-trained police officers, who hours later arrived on the scene in response to these co-conspirators’ alleged “emergency call” and did two security sweeps of the penthouses, later testified under oath that they found no damage whatsoever to any of the premises. I understand that Ms. Heard’s publicist, years later, tried to explain away this direct contradiction of Ms. Heard’s and her friends’ story by police by absurdly and falsely claiming to media that my lawyer and I had “paid off” the two dozen sworn eyewitnesses who contradicted her various claims, including the police officers. Ms. Heard tried to weakly explain this inexplicable contradiction in her own deposition to the testimony of the two police officers:

“A: I don’t know what they [the two police officers] – what they saw or didn’t see. I wasn’t ushering them around. They did that by themselves ... but there was extensive damage to which we have plenty of evidence that the officers saw extensive damage.

Q: Is it your testimony here today that the officers saw extensive damage?

A: I don't know what the officers saw." Exhibit A.

26. Ms. Heard and her perjurious, co-conspirator friends whom she invited to live rent-free in my penthouses also testified under oath that Ms. Heard had visible injuries to her face as a result of being struck by a cell phone and further battered by "some appendage" of me on May 21, 2016. Ms. Heard texted her makeup artist later that night, claiming that her face was "swollen" and looked "stupid." Ms. Heard's friend Elizabeth Marz testified under penalty of perjury that on the evening of May 21, 2016 "her eye – just the whole side of her face was like swolled [sic] up and red and puffy and ... it was red and puffy and swollen ... progressively getting worse" which is attached as Exhibit H.

27. I did not violently attack or even touch Ms. Heard, and Ms. Heard's and her friends' poorly fabricated accounts of that night are entirely disproven by the sworn accounts of two domestic abuse-trained police, both of my security guards (one of whom was an 18 year veteran of the Los Angeles Sheriff's Department), and the testimony of a multitude of witnesses whose face to face interactions with Ms. Heard throughout the ensuing week began the following day, May 22, 2016. The accounts of Ms. Heard's and her friends' is also contradicted by 87 surveillance videos that were captured, reviewed and preserved by the management staff of the Eastern Columbia Building.

28. Furthermore, when two LAPD police officers, Officer Melissa Saenz and Officer Tyler Hadden, arrived at 10:24 pm on May 21, 2016 they later testified under oath that Ms. Heard had no injuries to her face following two separate examinations of her face and body. Coupled with their testimony that there was no scene of destruction or indeed any damage whatsoever, both police officers testified under oath that Ms. Heard had no injuries, and they saw no property damage in the penthouse or the hallway. The entirety of their testimony is attached



here as Exhibits I and J. I understand that at 10:24 pm, Ms. Heard texted her makeup artist, Melanie Inglessis, that her face was “swollen” and “looked stupid.”

29. On Monday, May 23, 2016, Ms. Heard filed for divorce from me without making any allegations of domestic violence.

30. On May 25, 2016, Ms. Heard sent me a text message stating, “You and I have the control. And love each other. I thought you filed [for divorce]. You said you were going to and said good-bye. I’m sorry if I’ve hurt you. I have nothing but love for you.” In the text, Ms. Heard also admitted “[j]ust confirmed that cover letter [sent to your lawyer] is completely private and has nothing to do with any public record. (And only included the domestic violence restraining order stuff because I called the lawyer when the cops were here and I didn’t know what to or why -- didn’t know what to or why that happened and was scared). The text message is attached here as Exhibit K. Ms. Heard echoed this sentiment to her former friend and neighbor, Isaac Baruch, who testified that Ms. Heard said to him when he confronted her with her abuse hoax soon after she went public with it on May 27: “the lawyers are doing all of this.” Mr. Baruch’s declaration is attached here as Exhibit L.

31. When I did not accede to her demand for money, Ms. Heard publicly accused me of domestic violence, seeking and receiving a temporary restraining order against me when appearing in Los Angeles Superior Court on Friday, May 27, 2016 with a first-ever-seen prominent bruise and cut on her face that she claimed resulted from being hit in the face by a cell phone thrown by me and further facial battering from “some appendage” of mine on the evening of May 21, 2016.

32. Again, this domestic violence allegation was untrue, and Ms. Heard’s purported injury was staged. In addition to the police officers who observed her on the evening of May 21,

2016, there are over a dozen sworn statements that have been taken from eyewitnesses who interacted with Ms. Heard face to face in the days after May 21, 2016, and testified that she clearly had no injury to her face in the days leading up to going public with her hoax on May 27. Three people who worked in the Eastern Columbia Building have *twice* testified under oath that they had close, daily contact with a makeup-free Ms. Heard, in good light, and she had no visible injuries on her face or otherwise. Their depositions are attached as Exhibits M, N, and O. Brandon Patterson, a fourth building employee and the General Manager of the Eastern Columbia Building whom I do not know personally, stated the same thing under penalty of perjury in a declaration. That declaration is attached here as Exhibit P.

33. The testimony of the Eastern Columbia Building employees is confirmed by surveillance videos that captured images of Ms. Heard's face between May 22, 2016 and May 25, 2016. In each video, Ms. Heard does not have any marks on her face whatsoever. The videos are attached here as Exhibits F. Stills taken from those videos with close up shots of Ms. Heard's face are also attached as Exhibit Q. In one surveillance video, according to sworn testimony from Eastern Columbia Building personnel, Ms. Heard, her sister Whitney Heard, and her co-conspirator Raquel Pennington were captured returning to the building on two separate cameras the night of May 24, 2016. In the first surveillance video, they are laughing, and when Whitney Heard throws a fake punch at Ms. Heard's face, they laugh even harder. They are seen on a different camera continuing to act out the abuse hoax as they enter the elevator. Ms. Heard's face is visibly unharmed, at that point 3 full days after she claimed to have been battered by me. The Eastern Columbia Building employees also testified that they went back and reviewed the surveillance footage after Ms. Heard publicly unveiled her hoax and apparently battered face for the first time on May 27, 2016, as she appeared in court to obtain a temporary

restraining order. The building personnel testified that her injury claims were “false” based on their personal interactions with her between May 22, 2016 and the date she first unveiled her supposedly battered face May 27, 2016.

34. Furthermore, Ms. Heard’s own stylist, Samantha McMillen, has stated in a declaration under penalty of perjury that she interacted with Ms. Heard, face to face, on May 24, 2016, and that she could clearly see that she had no injuries. That declaration is attached as Exhibit R.

35. The first time that Ms. Heard was seen with an injury to her face was May 27, 2016—the day she went to out in public trailed by paparazzi and then to court to obtain the domestic violence restraining order against me. That she was visibly uninjured prior to May 27 was confirmed by the surveillance video footage and the testimony of the multitude of sworn witnesses who testified that they interacted with Ms. Heard throughout the week of May 22, 2016.

36. After I recently began to obtain new, previously hidden evidence to disprove the May 21, 2016 hoax that she presented to the court on May 27 to obtain a temporary restraining order against me, Ms. Heard chose to put further emphasis on other of her abuse claims, hoping that I would not obtain evidence that would dismantle those too. One such claim related to December 15, 2015. On that date, I was at my penthouse and Ms. Heard screamed at me and then violently assaulted me, scratching my cheek, chin and nose. My security guard, a former long time LA Sheriff’s Deputy, whom I called to pick me up the evening of December 15, 2015 insisted on taking photographs of my injuries, which are attached hereto as Exhibit C. There was nothing particularly memorable to me about this incident, given the sheer volume of violent assaults and other abuse I endured from Ms. Heard during our relationship.

37. Consistent with her pattern, Ms. Heard rewrote the story to a false one in which I assaulted her, and split her lip open, nearly broke her nose, blackened both her eyes and hit her so savagely and repeatedly that the bed broke. Unfortunately for Ms. Heard, her December 15 hoax has also been obliterated by two witnesses who have come forward -- her own stylist Samantha McMillen and our former Estate Manager Kevin Murphy - to provide sworn statements of their face to face interactions with a visibly uninjured Ms. Heard the following day, December 16, 2015. Ms. McMillen testified that while styling a makeup-free Ms. Heard the day of December 16, 2015 to prepare her for an appearance that evening on the "James Corden" show, Ms. Heard had no injuries whatsoever to her face. The December 16, 2015 "James Corden" show can be viewed on *Youtube*, and it evidences a visibly uninjured Ms. Heard who bears none of the markings that would exist if Ms. Heard's testimony was true. According to Ms. McMillen's testimony, after the show Ms. Heard said to Ms. McMillen, "can you believe I did that show with two black eyes?" Exhibit R. Ms. McMillen testified that Ms. Heard did not have two black eyes, before the show, during, or immediately after. Exhibit R. Again, Ms. Heard's hoax-assisting friend iO Tillett Wright jumped in to support the lie, writing in his piece in *Refinery 29* that he was with Ms. Heard the following day and witnessed her injuries. But iO Tillett Wright was not in LA on December 15, 2016 according to witnesses, because he was in Ohio filming a show. When confronted on May 16, 2019 by the public on social media about his published, *Refinery 29* lie of Ms. Heard's injuries that he "witnessed" held up against his social media post "geotags" showing he was in Ohio at the time, iO Tillett Wright admitted in a Twitter post that his "geotags" showed him to be out of LA, and confessed that he was "guilty of changing my geotags for sure." Nevertheless, he bewilderingly added he flew back "early" to attend to and witness Ms. Heard and further wrote: "I can change my geotags anytime and



anywhere and it has nothing to do with a case. I wouldn't be so naïve as to think that a lawyer or cop would ever use Instagram geotags because as soon as a judge found out you can change them it would get thrown out.”

38. On December 16, 2015, Ms. Heard also summoned our then-Estate Manager Mr. Murphy to my penthouse to complain about the fact that I had beaten her up the night before. Mr. Murphy testified that Ms. Heard's face was utterly uninjured and unmarked, and appeared makeup free, as they spoke face to face and in good light the day after she alleged the brutal attack. Mr. Murphy also testified that Ms. Heard called him back up to the penthouse bedroom specifically to show him a clump of blonde hair on the ground purporting to be hair I had pulled out of her head. Because of Ms. Heard's demeanor and the fact that she showed Mr. Murphy a clump of hair on the floor but not the place that hair was pulled from, Mr. Murphy grew suspicious and took a time- and date-stamped cell phone photograph of the hair clump, and later compared it to the hair clump Ms. Heard submitted to the court under oath. The hair clumps do not resemble each other, as Mr. Murphy testified in his declaration. Mr. Murphy, like other eyewitnesses, also testified to the very real violence Ms. Heard committed against me, that left real injuries.

39. Cynically relying on the concept of #believewomen that that has been promoted as part of the important #metoo movement, Ms. Heard's "evidence" rests primarily on her word and that of her dependent friends. She and they have falsely accused me of violence, although interestingly none of her "witnesses" say they ever witnessed any violence. And they did this despite the inconvenient truth of my possession of eyewitness statements provided under penalty of perjury and photographs of her converse violence committed against me, overwhelming evidence that her various abuse claims and the injuries that she claimed ensued from them are

hoaxes, the fact of her own prior arrest and incarceration for domestic violence against her previous wife, and new witnesses who are now coming forward to describe the brutal violence they suffered at her hands. She also lied about the circumstances of her domestic violence arrest, and the supposedly homophobic motivations of the arresting officer (a self-described lesbian gay rights activist) under oath. Exhibit A.

40. Indeed, lying under oath, and to courts and government agencies, and suborning or attempting to suborn the perjury of her friends and employees to help her get what she wants or to protect her from criminal prosecution, is demonstrably Ms. Heard's *modus operandi*. We recently obtained evidence showing Ms. Heard scheming in an email discussion with her lawyer Marty Singer (also, oddly, my lawyer in my divorce from Ms. Heard) to suborn the perjury of her former assistant Kate James to wiggle out of her criminal dog smuggling case. "*You have to be careful that she [Ms. James] will cooperate and will not go public, if you ask her not to be truthful*" grotesquely advised Mr. Singer in writing. Ms. Heard responded in the same email chain to Mr. Singer, copying Mr. Murphy, on the topic of seeking Kate James' "untruthful" testimony: "*Marty – I'm waiting to hear back from you before I reach out to Kevin to liaise with Kate. AH*". A follow up email was sent by Ms. Heard to Mr. Murphy, copying her lawyer Marty Singer, saying: "*Kevin, what do you think??? Could you possibly reach out to her for us?? Do you think you could get her to do it?*" "It" was Ms. Heard's hoped-for commission of perjury to submit to the Australian court. Mr. Murphy explained this email under oath, testifying that Ms. Heard asked him to suborn perjury from Ms. Heard's former assistant Kate James on Ms. Heard's behalf, and even attempted to bully Mr. Murphy into lying himself on her behalf by threatening his job after Mr. Murphy refused to lie, saying to him: "Well I want your help on this .... I wouldn't want you to have a problem with your job." Exhibit A to Kevin Murphy's

Declaration. Ms. Heard's attempts to suborn perjury to trick the Australian court are confirmed by the email attached to Mr. Murphy's declaration. In another illustrative incident showing Ms. Heard's relationship with the truth and willingness to defraud the government or anyone else to get what she wants, Ms. Heard sent a signed letter dated September 28, 2014 to the Department of Homeland Security, falsely claiming that her assistant Samantha McMillen, a citizen of the United Kingdom, was merely her "friend" traveling to the US on a tourist visa. Attached as Exhibit S is Ms. Heard's signed letter which says among other things: *"My name is Amber Heard. I am a proud American citizen. I am writing this letter in response to a fraudulent report made against my English friend, Savannah McMillen ... It has come to my awareness that while spending time visiting me in the United States someone made a false claim against her stating, without any proof or corroboration, that she was unlawfully working for me. As her friend, I can say truthfully and unequivocally that this allegation is entirely false.... I would like to go on record saying that Savannah McMillen is a personal friend, and to my knowledge, has never worked unlawfully or otherwise in the United States. Or for me. I regret that the precious time of our immigration agencies has been bastardized on such a petty personal matter made out of malice, not truth.... I expect the same standards that we hold as pillars in our great justice system, be allied to immigration policies, as they serve at the forefront in representing United States and her values."* In fact, the story that Savannah was merely her "friend" was a lie Ms. Heard, an "immigration activist," fraudulently wrote to Homeland Security to get what she wanted; Ms. Heard's assistant Savannah McMillen was illegally working in America, for Ms. Heard, as a simple Google search or paycheck in my possession would reveal. Lies, deception, and perjury are useful tools to Ms. Heard and her ilk – to obtain money, to accuse me of violent abuse and obtain a false temporary restraining order, to avoid criminal prosecution, to receive

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philanthropic invitations and accolades, to obtain illegal immigration rights for her assistant, to achieve and maintain fame, and to explain away evidence of her actions to the media for which there is no lawful or reasonable explanation.



Executed this \_\_\_\_ day of May, 2019 in Los Angeles, California.

I declare under the penalty of perjury under the laws of the United States of America and the State of Virginia that the foregoing is true and correct.

A large black rectangular redaction box covering the signature area.

John Christopher Depp, II

A black rectangular redaction box covering the name below the signature.