

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 TARA ROBERTS

I, Tara Roberts, declare as follows:

1. I am over the age of 18 and not a party to this action. I have firsthand, personal knowledge of the facts set forth below and if called as a witness could competently testify thereto.
2. I have worked for Johnny Depp as his Estate Manager on his Bahamian island property since December 2008.
3. While at the island, Johnny's then-wife Amber Heard usually did not communicate with me directly, most communications she chose to make through her assistant in LA or Johnny.
4. During the evening of December 29, 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 the point I walked out the office. A few minutes later I heard his vehicle start and I stepped outside. She 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 as I was unsure how far this would go. 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.

5. As some point Johnny tried to leave again as they were now in the parking lot. He repeatedly asked for the keys 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." I asked Christi what I should do, and she said that 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.

6. 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. 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 the gash.

7. 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.

8. Amber had also removed her wedding ring and thrown it and had asked for helping finding it as they were leaving that afternoon. It was found and returned to her.

9. 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.

10. 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 December 27 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.

11. 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 night before as I got them that morning, explained to them what had happened, and took them to their father.

12. When Amber would depart the island, she would always leave a considerable number of personal belongings behind. When she left the island on December 31, 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 belongings and toiletries were no longer in the house.

13. I never saw Johnny, who is an unusually kind man, be violent or aggressive with Amber or anyone else. I observed then to my colleagues that Amber was a "thrower;" someone who threw projectiles. I also witnessed Amber lunge violently at Mr. Depp, pull his hair, and commit other aggressive physical acts against him as well as the visible aftermath of these incidents.

14. 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.

15. I am aware that Amber claimed in court documents that Johnny violently attacked Amber on the island on August 17, 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 August 8, 2014, and departed on December 18. Johnny's doctor

arrived on August 12. 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.

Executed this __ day of June, 2019 in _____.

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.



Tara Roberts