

On behalf of: Claimant  
Witness: Kate James  
No: First  
Exhibit KJ1  
Date: 5 June 2020

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

**Claim No. QB-2018-006323**

**B E T W E E N:**

**JOHN CHRISTOPHER DEPP II**

**Claimant**

**-and-**

**(1) NEWS GROUP NEWSPAPERS LTD**

**(2) DAN WOOTTON**

**Defendants**

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**WITNESS STATEMENT OF KATE JAMES**

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I, KATE JAMES of [REDACTED] W Hollywood, WILL SAY as follows:

1. I work as a personal assistant to high profile people in the entertainment industry. I have been working in that capacity in Los Angeles for approximately 20 years. I worked for Amber Heard from around March 2012 until February 2015.
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.
3. I make this witness statement in support of the Claimant's claim in these proceedings.

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4. I do not know the full details of the Claimant's claims against the Defendants in these proceedings.

#### **Start of my employment by Amber Heard**

5. I had not heard of Amber at the time that I was hired. My son was 4 years old at the time, and Amber was looking for someone part-time and she lived in the same neighbourhood as me which is an important factor in LA with the traffic to consider. The terms suited me as I would be able to pick up my son from school every day. A similar part-time and flexible position is extremely difficult to find in my line of work. I recall being surprised when she chose to hire me since I am almost 20 years her senior, I briefly pondered on why she didn't choose a candidate closer in age to her. However I needed the work and accepted it.
6. Amber was already dating Johnny when I started working for her. At first, Amber didn't tell me who Johnny was, and would speak in disparaging terms about him. She would say that she was "*dating this old man*" and suchlike. She then disclosed that it was Johnny Depp, and I met him shortly after that. My first impression of him was how softly spoken and peaceful he was, almost a bit shy. He was very pleasant and courteous upon meeting me.

#### **Alcohol abuse**

7. During my time working for her, Amber would drink vast quantities of red wine each night. Meanwhile, she would ask me to buy Johnny non-alcoholic beer, as that's all that she would allow him to drink.

#### **My experience of Amber and Johnny's relationship**

8. In the three years that I worked for Amber, I would go to her house almost every day, including on weekends. I would not announce when I was going to attend the apartment to drop things off or pick things up, so it would regularly be without notice. I never saw any sign of an altercation, or even the aftermath of a serious and messy fight in the way that Amber describes in her statements.

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9. I never saw any physical violence by either Amber or Johnny. I saw Amber much more frequently than Johnny, almost every day for three years apart from when she was out of town. I understand that the period of my employment overlaps with the majority of incidents in which Amber has alleged that Johnny was violent towards her. I never once saw any bruising, swelling, or any evidence of what could have resulted from violence. I would often see her naked, or semi-naked, when she was getting dressed or at fittings. I was around her a lot, often 7 days a week.
10. Johnny was calm and quite shy in all of my experiences of him. He was always thoughtful and kind, and a genuinely decent person. I remember on more than one occasion where I had to bring my son back to work with me after picking him up from school. Johnny would be there and would hang out with him, teaching him how to play the guitar. He would be patient and kind with him. I would never have left my son with Johnny while I was working if I had any concerns about him whatsoever. Johnny would come back from travelling with gifts like little skull necklaces for his children, and he would always bring an extra one back for my son. I thought this was very thoughtful and kind, particularly considering that Amber was my employer and not him.

#### **Letter to the Department of Homeland Security, September 2014**

11. Amber asked me to send a letter she had drafted to Homeland Security in September 2014. She had hired a girl called Savannah McMillan to work as her set assistant. Savannah, a British citizen, had been held in immigration and questioned about the frequency that she had been coming and going from the USA. Amber's letter falsely claimed that Savannah was just a friend, and not an employee, so it was correct that she only had a tourist visa.
12. In Amber's letter, she called it fraudulent that it was being alleged that Savannah was working for Amber unlawfully. She said that as Savannah's "friend" she could "*say truthfully and unequivocally that this allegation is entirely false ... I would like to go on the record saying that Savannah McMillan is a personal friend, and to my knowledge, has never worked unlawfully or otherwise in the United States. Or for me.*" I knew this to be untrue, and that

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Amber was therefore wilfully lying to the US immigration department. I took a photograph of the letter and one of the pay checks from Amber to Savannah. A copy of these photographs is attached at pages 1-2 of KJ1.

### **Australia, 2015**

13. I am aware that shortly after Amber fired me, she got into trouble for unlawfully smuggling her dogs into Australia. We had previously used a dog transportation company who were hired to sort out the necessary paperwork and guide us through the process of preparing the dogs. This had worked well in 2014 when Amber took the dogs to England. When it became clear that Amber was intending to go to Australia, we were advised that it's a six-month process to prepare the dogs' immigration and began the process. Ultimately as the departure time approached, we became aware that there would be a discrepancy of around 10 days for the dogs to travel by private jet to Australia, the only other option being that they would have to travel in the hold on a commercial flight on the correct date.
14. I would attempt to talk to Amber about the date discrepancy frequently while we were trying to sort out the logistics, but her eyes would glaze over, and she would walk away. I discussed with Kevin Murphy about my concerns about the deadline, and Kevin in turn also then emailed Amber to explain that there would be a problem if they travelled before the correct departure date and that it would be illegal. Amber chose to ignore both of us. She deliberately smuggled the dogs into Australia. As in several circumstances which I observed, it was as if she felt that she was above the law.
15. It is my understanding that someone then took them to a local grooming parlour in Australia and started bragging that they were Johnny Depp's dogs. The owner posted about it on Facebook, and Amber got found out.
16. I remember the huge uproar at the time. I was told that Johnny had to send the dogs back to Los Angeles on a private jet, which would have cost a fortune from Australia. Ultimately, I woke up one morning many months later to find an email from my mother with an

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Date: June 2020

attachment of a newspaper article from my home town of Brisbane. I was devastated when I found out that Amber had blamed me in court. I broke down in tears at the thought that she blatantly lied in court in my home town and blamed me. Obviously I knew that was a complete lie and yet she had no problem in apparently perjuring herself in order to avoid responsibility.

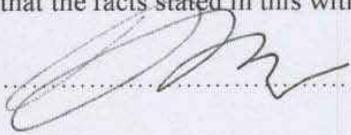
17. I have been told about the discussion that took place where Amber contemplated asking Kevin to ask me to sign a false statement to support her position that she did not know the dogs were not ready to be taken into Australia. Amber knew they weren't ready, yet chose to take them anyway. The fact that she was willing to ask me to sign such a statement under oath, especially as an Australian who cares and understands about the laws of my own country, is a reflection of her approach to me (and anyone in fact) in general. She did not care about throwing anyone under the bus, if it meant saving her own skin. Even if it meant lying in Court and to authorities. I believe it would have been obvious to Amber that I would not lie for her and so she decided not to approach me.

18. I recall a previous occasion in September 2013 when I was asked to speak with Kevin Murphy about amending the dogs' medical records so that they could travel together on 25 September 2013. Amber asked me if I knew a vet she could "grease". I attach the email at page 3 of KJ1.

**End of employment**

19. Amber fired me on 16 February 2015, pretty much right after she got back from their wedding in the Bahamas. She blindsided me.

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

Signed:  .....

**Kate James**

Date: 5th June 2020

On behalf of: Claimant  
Witness: Kate James  
No: First  
Exhibit KJ1  
Date: 5 June 2020

**Claim No. QB-2018-006323**

**IN THE HIGH COURT 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**

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**WITNESS STATEMENT OF  
KATE JAMES**

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**Ref: JA/JR/VA/D0185/001**

**Schillings International LLP**

12 Arthur Street

Candlewick

London

EC4R 9AB

Tel: 020 7034 9000

On behalf of: Claimant  
Witness: Kate James  
No: First  
Exhibit KJ1  
Date: 5 June 2020

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

**Claim No. QB-2018-006323**

**B E T W E E N:**

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(2) DAN WOOTTON**

**Defendants**

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**EXHIBIT KJ1 TO THE WITNESS STATEMENT OF KATE  
JAMES 5 JUNE 2020**

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AMBER VANREE  
803 W SUNSET BLVD  
LOS ANGELES CA 90046-2401

312

11-03/1210 CA  
90418

5/9/14

Date

Pay to the  
Order of

Savannah McMillan

\$ 1625

Exhibit



www.bankofamerica.com

**Bank of America**

ACH/EFT 121000020

For

*AVR*

⑆ 21000358⑆ 164104759708⑆ 0312

September 28, 2014

To whom it may concern,

My name is Amber Heard. I am a proud lawful American citizen.

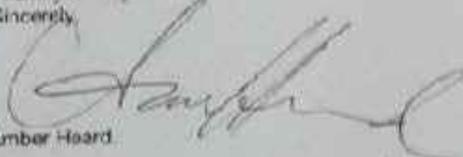
I am writing this letter in response to a fraudulent report made against my English friend, Savannah McMillen. It has come to my awareness that while spending time visiting me in the United States someone made a false claim against her stating, without any proof or corroboration, that she was unlawfully working for me.

As her friend, I can say truthfully and unequivocally that this allegation is entirely false. It was clearly made from the safety of anonymity in order to satisfy a personal vendetta. This allegation absolutely bears no merit, worth or truth.

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 would like to request that this fraudulent report be removed pending the confirmation of its baseless and false stance. 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. Since I expect further investigation to reveal the statements made above as true, I hope that your agency will see to it that no further inconvenience will befall my friend in her attempts to continue discovering our beautiful country.

Thank you for your time.  
Sincerely,

  
Amber Heard

Sunday, June 5, 2016 12:21 PM

Subject: Pistol and boo

Date: Saturday, September 21, 2013 at 11:40 AM

From: Amber Heard [REDACTED]

To: Kate James [REDACTED]

Can you maybe help Kevin procure a slightly altered health doc that has their shots recorded as two days before so they can all leave together on the 25th?? Do we have a vet we could grease ? Connection?

Sent from my iPhone

*Left Intentionally Blank*

D197-D209

On behalf of: Claimant  
Witness: Kate James  
No: Second  
Date: 12 July 2020

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

**Claim No. QB-2018-006323**

**B E T W E E N:**

**JOHN CHRISTOPHER DEPP II**

**Claimant**

**-and-**

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

**Defendants**

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**SECOND WITNESS STATEMENT OF KATE JAMES**

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I, **KATE JAMES** of [REDACTED] **W Hollywood, WILL SAY** as follows:

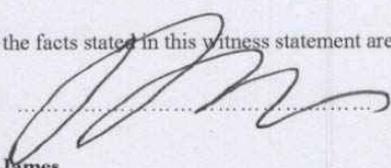
1. I work as a personal assistant to high profile people in the entertainment industry. I have been working in that capacity in Los Angeles for approximately 20 years. I worked for Amber Heard from around March 2012 until February 2015.
2. Unless stated otherwise, the facts and matters referred to in 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.
3. I make this witness statement in support of the Claimant's claim in these proceedings.
4. This is my second statement. I make it in response to paragraph 43 only of Amber Heard's Fifth Witness Statement.

On behalf of: Claimant  
Witness: Kate James  
No: Second  
Date: 12 July 2020

5. When I was 26 years old and traveling in Brazil, I was violently raped by an unknown male at Machete point, having been woken by the perpetrator whilst sleeping alone in my dwelling. This ordeal went on for 5-6 hours and I narrowly escaped with my life. This torturous experience of such extreme sexual violence has haunted me ever since and permanently changed the trajectory of my life to this day. Over the years, I have shared this incident with many close friends, family and therapists.
6. In 2013, Ms Heard became aware of what happened to me as I had talked about it with a friend of hers at her apartment. Ms Heard then summoned me to her office where we sat on her couch and she questioned me about it, she was curious as to how I coped with it on a daily basis and she suggested I buy a gun. I was shocked at that suggestion as I would not consider having a gun in my home with a small child around. I responded that I chose to see myself as a “rape survivor” and not a “rape victim”, and that is how I found my own way to cope.
7. On June 25, 2020, I received documents pertaining to my involvement on behalf of the Claimant in this case. As I perused the documents, much to my utter shock and dismay, I discovered that Ms Heard had in fact stolen my sexual violence conversation with her and twisted it into her own story to benefit herself. This of course caused me extreme distress and outrage that she would dare to attempt to use the most harrowing experience of my life as her own narrative.

I believe that the facts stated in this witness statement are true. I understand that proceedings for contempt of court may be brought against anyone who makes, or causes to be made, a false statement in a document verified by a statement of truth without an honest belief in its truth.

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

Signed: 

Kate James

Date: 12 July 2020

On behalf of: Claimant  
Witness: Kate James  
No: Second  
Date: 12 July 2020

**Claim No. QB-2018-006323**

**IN THE HIGH COURT 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**

---

**SECOND WITNESS STATEMENT OF  
KATE JAMES**

---

**Ref: JA/JR/VA/D0185/001**

Schillings International LLP  
12 Arthur Street  
Candlewick  
London  
EC4R 9AB

Tel: 020 7034 9000

**D240**

On behalf of: Claimant  
Witness: Kevin Murphy  
No: First  
Date: 12 December 2019  
Exhibit: KM1

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

Claim No. QB-2018-006323

JOHN CHRISTOPHER DEPP II

Claimant

-and-

(1) NEWS GROUP NEWSPAPERS LTD

(2) DAN WOOTTON

Defendants

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FIRST WITNESS STATEMENT OF  
KEVIN MURPHY

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I, **KEVIN MURPHY**, of [REDACTED] Illinois 640, USA, Estate Manager, **WILL SAY** as follows:

1. I was previously employed by the Claimant, Mr John Christopher Depp II for nearly eight years as an estate manager. I have worked in a similar capacity for other high-net worth individuals for the past 21 years. I ceased working for Mr Depp in 2016. 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: Kevin Murphy  
No: First  
Date: 12 December 2019  
Exhibit: KMI

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 understand from the Claimant's solicitors that these proceedings relate to the allegations that Mr Depp was abusive to his former wife, Ms Amber Heard, throughout their relationship.
5. As Mr Depp's estate manager, I oversaw and managed his various properties, including communicating with persons hired for maintenance, security, and cleaning. I also assisted Mr Depp and Ms Heard with various personal tasks when necessary. Due to the nature of this role, I interacted constantly with both Mr Depp and Ms Heard.
6. Throughout the course of my employment, I think that I must have spent more time with Mr Depp and Ms Heard than any other member of their staff. I was with them very regularly throughout this period and I never saw any cuts, bruises or other injuries on Ms Heard. Neither did Ms Heard ever mention that she was the victim of any verbal or physical abuse, other than as set out below at paragraphs 13 to 15 below. I never saw Mr Depp commit any act of physical violence, whether against Ms Heard or anyone else. In contrast, I witnessed Ms Heard shout angrily at Mr Depp on multiple occasions. I was also told by Mr Depp many times that Ms Heard had been physically abusive to him.

**I. Ms Heard's requests for false statements in Australian proceedings**

7. In October 2015, Ms Heard was subject to criminal proceedings in Australia for illegally smuggling her and Mr Depp's dogs into the country. On October 11<sup>th</sup> and 12<sup>th</sup>, 2015, Ms Heard asked me to contact her former assistant, Ms Kate James, and ask Ms James to lie under oath to the Australian court prosecuting Ms Heard. Specifically, Ms Heard wanted Ms James to give a false statement that Ms Heard was unaware that it would be illegal for her to bring her dogs into Australia. Ms Heard was aware that this was illegal, because I had informed her repeatedly by email, telephone and in person. I told Ms Heard that I was

On behalf of: Claimant  
Witness: Kevin Murphy  
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Exhibit: KM1

uncomfortable with giving a false statement to the Court and that I would not ask Ms James to do so.

8. Before asking me to request that Ms James give such a statement, Ms Heard forwarded me an email she had received from her lawyer, Marty Singer, dated October 11<sup>th</sup>, 2015 stating: *"if you could get Kate to sign a statement, it could be helpful. I don't know what your relationship with her is at this time since you fired her. You will have to be careful that she will cooperate and will not go public, if you ask her not to be truthful."* Ms Heard responded on the same date at 08.58 a.m. stating: *"Marty - I'm waiting to hear back from you before I reach out to Kevin to liaise with Kate. AH"*. A further email from Ms Heard to me, copying Mr Singer, dated 11 October 2015 at 4:02 pm stated: *"Kevin, do you think you could get her to do it?"* Although I did not attempt to solicit a false statement from Ms James, Ms Heard told me verbally shortly after that there was too much risk that Ms James would go public with the truth regarding her knowledge that the dogs could not legally travel to Australia.
9. Shortly after Ms Heard's request that I obtain a false statement from Ms James, Ms Heard demanded verbally that I myself make a false witness statement regarding the dogs' illegal entrance into Australia. I expressed that I was extremely uncomfortable with doing so, to which Ms Heard responded with words to the effect of: *"Well I want your help on this ... I wouldn't want you to have a problem with your job."* Ms Heard's threatening language made me feel anxious and uneasy. As stated above, I had instructed Ms Heard on a number of occasions by email, telephone and in person that she could not take the dogs to Australia because the relevant paperwork and permits were not complete and the required 10 day quarantine arrangements had not been put in place. I also informed her that the criminal penalties for knowingly smuggling animals into Australia without following the correct procedures could be severe. I further reminded her that the requirements were more stringent, and penalties more severe, in Australia than in the Bahamas, where Ms Heard had previously smuggled the dogs on a prior occasion. I understand that Ms Heard later told the court in Australia that I had told her it was fine to bring the dogs into Australia. That is false and I never told her this.

On behalf of: Claimant  
Witness: Kevin Murphy  
No: First  
Date: 12 December 2019  
Exhibit: KM1

## II. Ms Heard's acts of abuse toward Mr Depp

10. Through the course of my employment, I have heard Ms Heard scream at Mr Depp on multiple occasions. I have not heard Mr Depp scream at Ms Heard. I believe that Ms Heard is a highly volatile person. She becomes increasingly volatile when she drinks and when she drinks in combination with the amphetamine, Provigil, a drug which I understood she took regularly when I was employed by Mr Depp. Her violent behavior also increased when she drank wine, which she requested that I bring her on multiple occasions.
11. On one occasion, I cannot remember exactly when, I was informed by Mr Depp of a specific act of violence against him on the deck of one of Mr Depp's properties, at 1480 North Sweetzer Avenue in Los Angeles, just two minutes before I had arrived. Mr Depp told me that Ms Heard had become enraged and threw a heavy television remote control at Mr Depp's face. The television remote had connected with Mr Depp's forehead with such force that it had broken. When I arrived at the property, I could clearly see a round, swelled lump and laceration to Mr Depp's forehead, left by the television remote. Mr Depp appeared uncomfortable and embarrassed by the situation. He stated that it was "*no big deal*" and asked me if I could get the remote fixed or replaced.

### **Specific Incidents Alleged by the Defendants**

12. I understand from Mr Depp's solicitors that the Defendants allege, amongst other things that, Mr Depp abused Ms Heard and threw items around on December 15<sup>th</sup>, 2015, April 21<sup>st</sup>, 2016 and May 21<sup>st</sup>, 2016. I address what I remember about the events on those dates in detail below, but, as a general point, if the allegations had been true, there would have been noticeable damage to both Ms Heard and the property in the penthouses I was responsible for, particularly because there are many items hanging in those penthouses such as photos and art, as well as several guitars which could have easily been picked up and thrown or broken. In the course of my employment, I did not see the kind of damage described.

#### **(a) December 15<sup>th</sup>, 2015**

On behalf of: Claimant  
Witness: Kevin Murphy  
No: First  
Date: 12 December 2019  
Exhibit: KM1

13. I have been told by Mr Depp's solicitors that it is alleged that on December 15<sup>th</sup>, 2015, Mr Depp beat Ms Heard so hard in the face and body that their bed broke.
14. I attended Mr Depp's penthouse at 849 South Broadway, Los Angeles, California 90014 (the "**Penthouse**") on December 16<sup>th</sup>, 2015. Shortly after I arrived, Ms Heard called to me from upstairs in the master bedroom. When I went upstairs, I found her sitting at the edge of the bed crying. Ms Heard said that Mr Depp had hit her in the face several times and pulled out her hair. I remember standing roughly four feet away and becoming suspicious, as Ms Heard did not appear to be wearing any makeup on this occasion and there were no marks, bruises, cuts, redness or swelling to Ms Heard's face, nor was there any area on her head where her hair appeared to have been pulled out. I believe she was waiting for a stylist and/or make-up artist to arrive at this time.
15. About an hour or so following this discussion, Ms Heard told me that she wanted to show me something in the bedroom of Penthouse 4. I followed Ms Heard to the upstairs bedroom of Penthouse 4 and she showed me a tuft of hair that she claimed Mr Depp had pulled out of her head the previous evening. Because I was suspicious of these claims, I immediately took a photograph of the hair with my mobile phone. I was subsequently shocked to see a photo on the internet which had been produced by Ms Heard, showing the hair she claimed had been pulled out by Mr Depp and an injury to her head. When I compared this to the photograph I had taken on my own mobile phone, the hair looked quite different to the hair in the photograph Ms Heard had presented as evidence. I have exhibited the photo that I took of her hair along with the photo that Ms Heard had taken and I believe the differences are apparent. The photos are at pages 1 of Exhibit KM1. In addition, I understand that it is alleged by the Defendants that, in the course of physically abusing Ms Heard, Mr Depp broke the bed frame of the bed with his boot. I also took a photo of the bed at the time, which is exhibited at page 2 of Exhibit KM1. My photo is different to that subsequently released by Ms Heard, which is exhibited at page 3 of Exhibit KM1.

**(b) April 21<sup>st</sup>, 2016**

On behalf of: Claimant  
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No: First  
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16. I have been told by Mr Depp's solicitors that the Defendants also allege that on April 21<sup>st</sup>, 2016, Mr Depp arrived at Ms Heard's birthday event drunk and high on drugs, and proceeded to abuse Ms Heard following an argument, which arose due to his prior absence.
17. On April 21<sup>st</sup>, 2016, Ms Heard held a birthday celebration at the Penthouse. Mr Depp requested that I provide Ms Heard with all the help that I could give and I spent around five hours assisting other employees in setting up one of the units for the party. I left the Penthouse at around 6:30 pm and that was the last time that I saw Ms Heard that day. I had seen Mr Depp earlier in the day, but he had been away for meetings during the afternoon. He had told both me and Ms Heard about his meetings earlier in the day and had indicated that they could go on late. Mr Depp's security detail, Sean Bett, has since told me that Ms Heard had, in fact, become enraged by Mr Depp arriving late from a business meeting to her birthday dinner, and had punched him repeatedly in the face as he lay reading in bed. I do not remember when he told me this, but I believe that he told me this the next day.
18. On April 22<sup>nd</sup>, 2016, Ms Heard and her friends were due to and did travel to the Coachella Music Festival. I spoke on the telephone with Hilda Vargas, Mr Depp's housekeeper, who was cleaning the Penthouse that day. Ms Vargas told me that she had discovered feces in Mr Depp's and Ms Heard's shared bed. Shortly after our telephone call, I received pictures from Ms Vargas of feces on top of the bed sheet, on Mr Depp's side of the bed. When I arrived at the Penthouse, I was shocked and disgusted by what I observed as human feces on the bed. Ms Heard has since publicly blamed the feces on one of the dogs, however, the feces did not appear to come from either of Mr Depp's and Ms Heard's two small Yorkshire terriers. I have walked, cleaned up after, played with and interacted with these dogs many times, and their feces have always been significantly smaller than what I saw in the bed.
19. I had sent the pictures to Mr Bett and then spoke with Mr Depp personally about the pictures around 24 hours later. I told him that human feces had been left in the bed. I remember him being sullen and disgusted. At that stage, I believe he suggested getting the feces DNA tested to see where they had come from.

On behalf of: Claimant  
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20. On May 12<sup>th</sup>, 2016, I received a text and then a telephone call from Ms Heard. When I spoke with Ms Heard, she sounded very angry. She told me that she needed her privacy, that she and Mr Depp were having problems and that my sending Mr Bett the pictures I had received from Ms Vargas was not helping with those problems. She also told me that leaving the feces in Mr Depp's bed had been "*just a harmless prank*". In addition, she told me that she was thinking of changing the locks to the Penthouse. I advised her that I would change the locks for her if both Mr Depp and she agreed.

**(c) May 21<sup>st</sup>, 2016**

21. On May 21<sup>st</sup>, 2016, at 7.46 p.m., I received a telephone call from both Mr Depp and Ms Heard who were on speaker-phone together. Mr Depp told me that he was sitting there talking to Ms Heard and he asked that I tell Ms Heard what I had previously told him about the feces incident the month before. I then relayed to Ms Heard, again, that Ms Vargas had discovered feces on top of the bed sheet in Mr Depp's and Ms Heard's bed. I also repeated that Ms Heard had admitted that she was responsible for what she referred to as a "*harmless prank*". Ms Heard yelled and called me "*a fucking liar*" multiple times. I asked her to stop yelling and swearing at me and overheard Mr Depp in the background saying "*please don't speak to him that way. Be respectful.*" I then heard Mr Depp say that he couldn't do this anymore and wanted a divorce. When Ms Heard would not stop yelling, I hung up the telephone. I received multiple additional telephone calls from the same number in the minutes that followed, but I did not answer them.

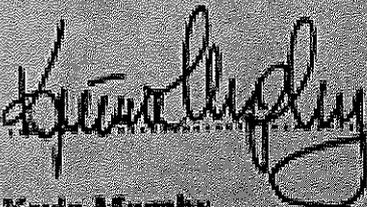
22. At approximately 8 or 8.15 p.m. on the same date, I received a text from Mr Bett indicating that Mr Depp alone was going to call me shortly from Mr Bett's telephone. I took the telephone call a few minutes later and Mr Depp immediately apologised for Ms Heard's behaviour and for putting me in the middle of his marital issues. I did not see Mr Depp that night, but during our conversations he was sober, lucid and calm and seemed tired or sad. He did not appear to be angry.

On behalf of: Claimant  
Witness: Kevin Murphy  
No: First  
Date: 12 December 2019  
Exhibit: KM1

23. I believe one of the staff from the building in which the Penthouse was located, Ms Trinity Esparza, contacted me later that evening to ask if everything was ok in the Penthouse as the police had been called. I replied that I believed it was, or words to that effect.

On behalf of: Claimant  
Witness: Kevin Murphy  
No: First  
Date: 12 December 2019  
Exhibit: KM1

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

Signed:   
Kevin Murphy

Date: 12 December 2019

On behalf of: Claimant  
Witness: Kevin Murphy  
No: First  
Date: 12 December 2019  
Exhibit: KM1

**Claim No. QB-2018-006323**

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

**BETWEEN:**

**JOHN CHRISTOPHER DEPP II**

**Claimant**

**- and -**

**(1) NEWS GROUP NEWSPAPERS LTD**

**(2) DAN WOOTTON**

**Defendant**

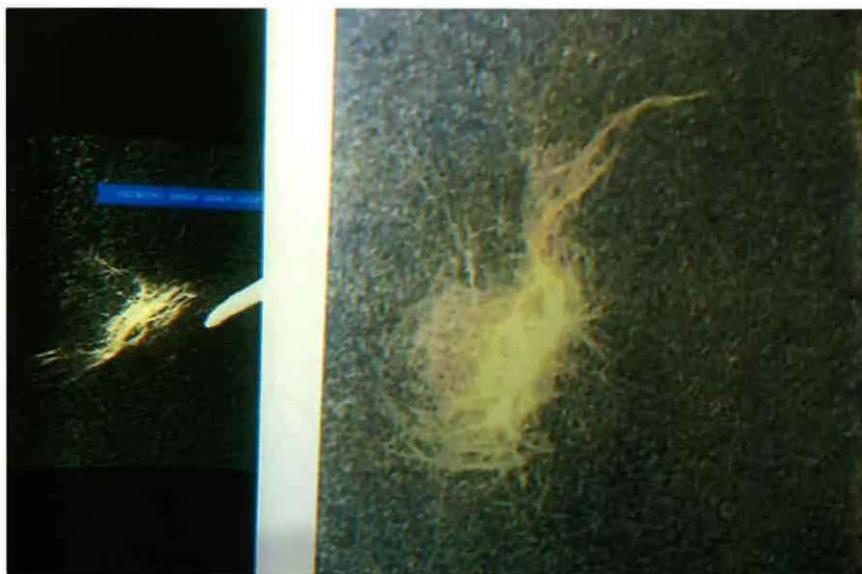
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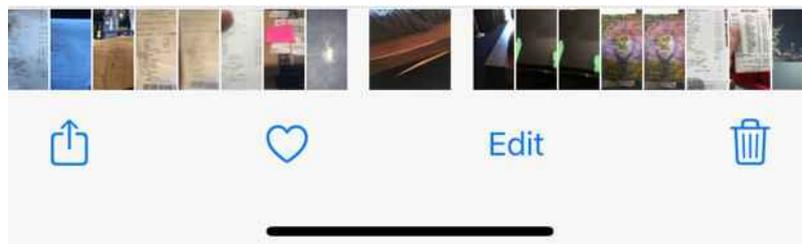
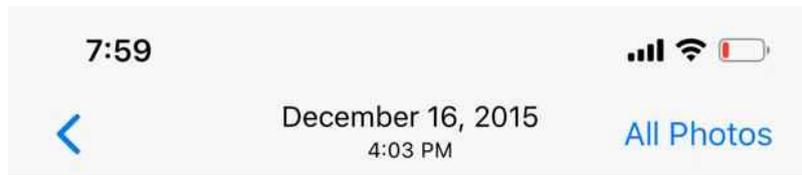
**FIRST WITNESS STATEMENT OF  
KEVIN MURPHY**

---

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







Claimant  
K Murphy  
Second  
Dated 23 June 2020

**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**

---

**SECOND WITNESS STATEMENT OF KEVIN MURPHY**

---

I, **KEVIN MURPHY** of [REDACTED] Illinois 640 USA, Estate Manager, will say as follows:

1. I was previously employed by the Claimant, Mr John Christopher Depp II for nearly eight years as an estate manager.
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. This is my second witness statement in this claim. I make the statement in response to the disclosure of a document by the Defendants on 14 June 2020 referred to below.

Claimant  
K Murphy  
Second  
Dated 23 June 2020

4. Paragraphs 7 to 9 of my first witness statement dated 12 December 2019 addressed Ms Heard's requests to me to obtain false evidence for proceedings in Australia. I stand by that evidence and make this further statement in order to expand on that issue.

#### **My involvement in arrangements for the dogs to travel to Australia**

5. I was involved in the process to ready the dogs for travel to Australia in April 2015 from start to finish. I hired the agency that facilitated the paperwork and scheduled veterinary work that needed to be accomplished prior to the dogs traveling to Australia. I was also the person that cancelled the contract for services with All Pet Travel, the company dealing with the paperwork, after multiple conversations with Ms Heard regarding the status of the necessary paperwork and the fact that the paperwork was not going to be completed in time for the dogs to travel to Australia. I refer to the invoice dated 9 April 2015 from All Pet Travel at page 1 of KM2 which refers to "Australia Travel Planning – Cancellation" and also a copy of a letter from Ms Debbie Rogers at All Pet Travel dated 16 June 2020 is enclosed at page 2 of Exhibit KM2, which supports this fact.
6. I began to have concerns in mid-to-late March 2015 that timing constraints were not going to allow the dogs to be vaccinated in time to travel to Australia by mid-April 2015. I expressed those concerns to Ms Heard in person, by phone and in emails. Ms Heard asked me on several occasions if there was any other way to get the dogs to Australia. I investigated different options, but they involved allowing the dogs to fly cargo on another flight. Ms Heard would not allow that so we ran out of options. At this point Ms Heard appeared to accept that there was nothing else that we could do and that the dogs would not be able to travel to Australia in time for her flight (see the emails exchanged between Ms Heard and I at pages 3 to 8 of Exhibit KM2).

Claimant  
K Murphy  
Second  
Dated 23 June 2020

7. I explained to Ms Heard on several occasions that bringing animals into Australia was like no other country that we had sent the dogs to before in terms of the length and specificity of the paperwork process, and mandatory quarantining upon arrival. I also explained to Ms Heard several times the fact that trying to take the dogs in to Australia without completing the mandatory process was illegal and could result in very harsh penalties including euthanizing the dogs, fines and potential jail time.
8. Prior to Ms Heard and Mr Depp leaving for Australia I notified Ms Christi Dembrowski, Mr Nathan Holmes, Mr Steven Deuters, Mr Jerry Judge, Mr Malcolm Connolly, Mr Sean Bett and Mr Joel Mandel that the dogs were not allowed to be taken to Australia. I further explained that the dogs should not be taken because it would be illegal and that there could be severe penalties. I made a point of discussing this matter because Ms Heard had brought the dogs into the Bahamas without paperwork and vaccinations in another instance in July 2014 and in knowledge of the risks of doing so. I refer to the photograph taken of Boo in July 2014 in the Bahamas at page 9 of Exhibit KM2 which I believe was that occasion. Due to Amber's inconsideration of the proper precautions required, there was a heightened awareness between me, staff and the business office of proper paperwork being in place for future trips.
9. At no time did I discuss this matter with Mr Depp because he never wanted the dogs to travel on any occasion as he felt they would have better care in Los Angeles with staff.
10. Upon getting to work the morning following Mr Depp and Ms Heard's departure for Australia I was shocked to learn that Ms Heard had taken the dogs despite our discussions and my warnings of severe legal ramifications. I spoke with Jerry Judge shortly afterwards who explained that Ms Heard had insisted on bringing them to Australia. At Exhibit KM2 pages 10 to 11 are the messages exchanged between me and Ms

Claimant  
K Murphy  
Second  
Dated 23 June 2020

Dembrowski and Mr Deuters when they learned that Ms Heard had gone to Australia with the dogs.

### **My declaration for the Australia proceedings**

11. As stated at paragraph 9 of my first witness statement, on or about October 2015 Ms Heard requested that I make a false statement regarding the dogs' illegal entrance into Australia. When I expressed that I was extremely uncomfortable with this, Ms Heard said to me "*Well I want your help on this ... I wouldn't want you to have a problem with your job.*" It became very apparent to me that Ms Heard was threatening my job stability unless I cooperated with providing a declaration that supported her false account for the Australia proceedings. Because of this I felt extreme pressure to cooperate, despite knowing this would involve being untruthful.
12. On 13 October 2015 I signed a declaration for the Australian proceedings that discussed the circumstances in which Ms Heard brought her and Mr Depp's dogs into Australia (see Exhibit KM2, pages 12 to 13). This declaration was prepared by Ms Heard's US lawyer in this matter. That declaration contained statements that were not entirely truthful. It was not true that Ms Kate James, Ms Heard's assistant, was responsible for the paperwork and had not completed it and that this was the reason why Ms Heard travelled with the dogs to Australia without the necessary paperwork. The true position is that I was responsible for the paperwork which I could not obtain in time and that Ms Heard was fully aware of this in advance of travelling to Australia with the dogs.
13. The lawyers with conduct of the matter were Ms Heard's lawyer in the US, with whom I dealt primarily. Ms Heard also had Australian counsel at Ashurst.
14. I was told by both US and Australian Counsel that my statement, in the terms that they had drafted on Ms Heard's behalf, would be integral to

Claimant  
K Murphy  
Second  
Dated 23 June 2020

the outcome of the proceedings. I was told that I was going to have to travel to Australia to testify in person on Ms Heard's behalf. Ms Heard knew that she was asking me to lie under duress, and from what she said to me it was clear to me that I was essentially being told by her that my job would be at risk if I did not agree to her demands.

15. I was very relieved that the matter then settled and I was not going to be asked to lie in person in Australia.

#### **My attempt to seek legal advice**

16. I was never comfortable with the fact that I had given a statement that was not entirely truthful, but as long as Ms Heard was still with Mr Depp, I did not feel able to take steps to remedy this without there being a risk to my job.
17. Around late May 2016 Ms Heard filed for divorce from Mr Depp. A few weeks later, on June 23, 2016. I retained the services of the law firm Huang, Ybarra, Singer & May LLP (now Halpern, May, Ybarra, Gelburg LLP ("HMYG")) in order to seek advice on retracting my declaration in the Australian proceedings. I felt I could take this step at this time because Ms Heard no longer had control or influence over my job. This was my attempt to right a wrong.
18. This effort was completely independent of Mr Depp and I personally incurred all of the legal costs. Please see the letter from HMYG confirming the time of my instructions enclosed at page 14 of Exhibit KM2.
19. Through HMYG, I then retained an Australian barrister, Robert Ranken, on 14 July 2016 for specialist advice concerning my potential criminal liability. I sought advice as to the implications in Australia arising from the false statement provided by me in a statutory declaration tendered in criminal proceedings in Queensland, the prospect of avoiding

Claimant  
K Murphy  
Second  
Dated 23 June 2020

prosecution by making a voluntary disclosure as to the falsity of such statements, and the steps I would need to take to make a voluntary disclosure. I very much wanted to understand the process and to explain the pressure that I had been under to sign a statement that Ms Heard knew to be false.

20. In August 2016 I resigned from my position with Mr Depp. Because I was no longer working, and my legal bills were costly it was no longer financially feasible for me to continue pursuing this matter.
21. Following the proceedings, Ms Heard continued to travel with her dog and even made a joke of the Australia incident with her caption on social media. Please see the photographs at page 15 to 17 of Exhibit KM2.

#### **Savannah McMillan**

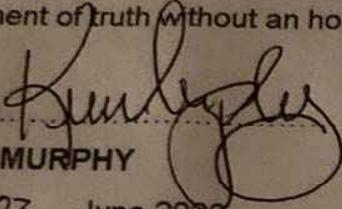
22. I do not believe that Ms Heard would have been concerned about the position I was put in and that I was being compelled to lie to the authorities in Australia. I understand that Ms Heard was prepared to lie directly to the Department of Homeland Security in September 2014 in relation to her assistant, Savannah McMillan. I have seen the letter that was sent to them from Ms Heard denying that Ms McMillan was an employee. I understand that this letter has already been disclosed in these proceedings.
23. I enclose examples of text messages and emails at pages 18 to 28 of Exhibit KM2 from between April 2014 to March 2016 to which I was copied where Ms McMillan is active in the role of Ms Heard's assistant.

Claimant  
K Murphy  
Second  
Dated 23 June 2020

**STATEMENT OF TRUTH**

I believe that the facts stated in this witness statement are true. I understand that proceedings for contempt of court may be brought against anyone who makes, or causes to be made, a false statement in a document verified by a statement of truth without an honest belief in its truth.

Signed.....



**KEVIN MURPHY**

Dated: 23 June 2020

Claimant  
K Murphy  
Second  
Dated 23 June 2020

**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

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**SECOND WITNESS STATEMENT OF  
KEVIN MURPHY**

---

**Ref: JA/JR/VA/D0185/001**

**Schillings**  
12 Arthur Street  
Candlewick  
London  
EC4R 9AB

Tel: 020 7034 9000

**Claim No. QB-2018-006323**  
**IN THE HIGH COURT 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**

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**EXHIBIT KM2**

---



**ALL-PET TRAVEL**  
FIRST CLASS CARE FOR YOUR PETS

1955 W. Grant Road, #148, Tucson, Arizona 85745  
520.622.5252 phone, 866.359.7387 toll free  
520.203.0242 fax

April 9, 2015

Erica Wright  
The Management Group  
100 Wilshire Blvd Suite 400 West  
Beverly Hills, CA 90212

Ending Statement for Services for Boo & Pistol – Australia Can

Australia Travel Planning – Cancellation
FedEx Costs to USDA
USDA Endorsements for RNATT Tests in preparation of obtaining In
Total: \$1365.00
Billed to Mandel, Joel – VISA ending in 6143

Please contact me if you have any questions.

Debbie H. Rogers  
800-699-3012, toll-free  
520.622.5252, phone  
520.203.0242, fax  
[debbie@allpettravel.com](mailto:debbie@allpettravel.com)  
<http://www.AllPetTravel.com>  
<https://www.facebook.com/AllPetTravel>



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1955 W. Grant Road #148, Tucson, Arizona 85745  
520.622.5252 phone, 866.359.7387 toll free  
520.203.0242 fax

---

June 16, 2020

To whom it may concern:

On or around October 3, 2014 I was contacted by Kevin Murphy to enquire about moving two dogs (Boo & Pistol) from Los Angeles to Australia. All of my dealings were with Mr. Murphy except for a few communications with a female assistant of Ms. Heard's - whose name I cannot remember at this time.

I have been employed with All Pet Travel since November of 2004 and have relocated thousands of animals throughout the world during that time.

I was contacted by Mr. Murphy on April 5, 2015 to cancel all dealings for Boo & Pistol's to Australia since the timing for the necessary final permit was not sufficient for travel to Australia given the strict requirements for entry.

I did explain to Mr. Murphy that Boo & Pistol should NOT under any circumstances travel to Australia without meeting all the necessary rules and regulations and the consequences could be very severe, including euthanasia.

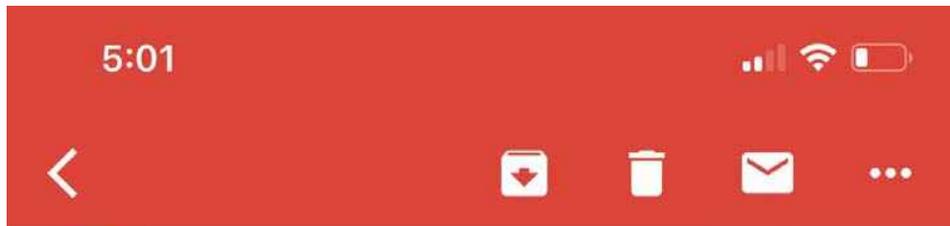
Please let me know if you have any questions.

Thank you!

*s/Debbie Rogers*

Debbie Rogers  
520.256.2999

**D237.11**



me



to AH

Mar 29, 2015 [View details](#)

Hi.

Because of the paperwork process (combination of vet visits and permit application) for pet travel to Australia the time frame for the dogs to be able to travel there was always the end of April. We started the process quite some time ago. I think J is returning around the 10th/12th. I believe the dogs are not able to enter Australia til the 27th.

Let me know if you have additional questions.

...



AH

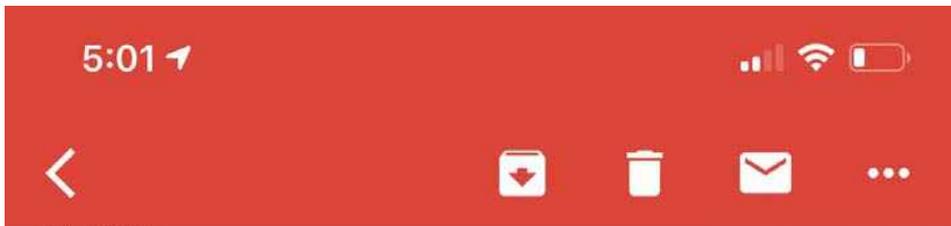


to me

Mar 29, 2015 [View details](#)

Shit. Ok. Hum.... We're out of options then?

Because I don't know what else to do.



27th.

Let me know if you have additional questions.

...



AH

...

to me

Mar 29, 2015 [View details](#)

Shit. Ok. Hum.... We're out of options then?  
Because I don't know what else to do.

Sent from my iPhone

...



me

...

to AH

Mar 29, 2015 [View details](#)

Morning....  
Would you allow them to fly cargo?

...



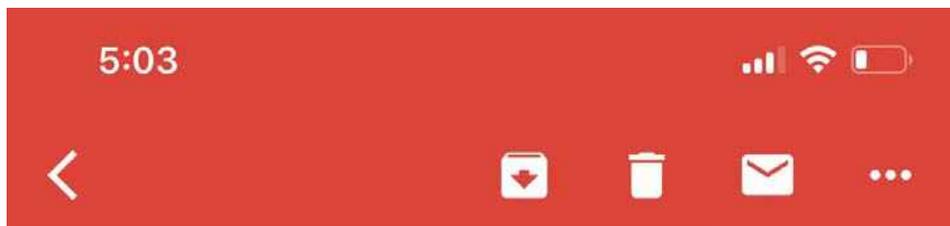
AH

...

to me

Mar 29, 2015 [View details](#)

...



From: **Kevin Murphy**

<[m.kevin.murphy@gmail.com](mailto:m.kevin.murphy@gmail.com)>

Date: Sat, Mar 28, 2015 at 5:16 PM

To: AH <[arrowsarc@icloud.com](mailto:arrowsarc@icloud.com)>

Hi..

Just making sure you know that the dogs will not be allowed to fly commercial in the passenger compartment to Aus. They would have to go cargo. They do not make exceptions for service dogs to Aus.

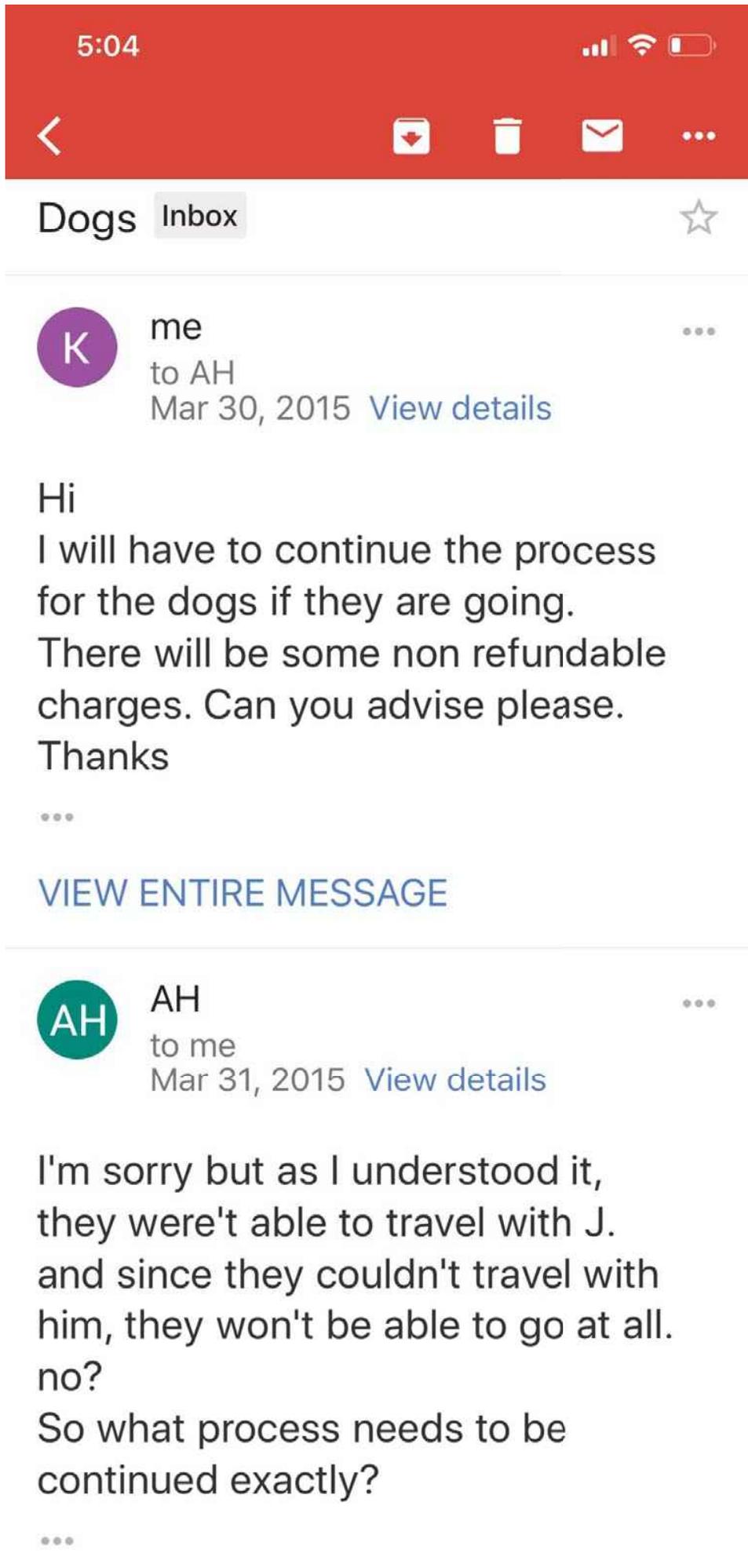
Just want to make sure you understood. It has been a very complex process thus far.

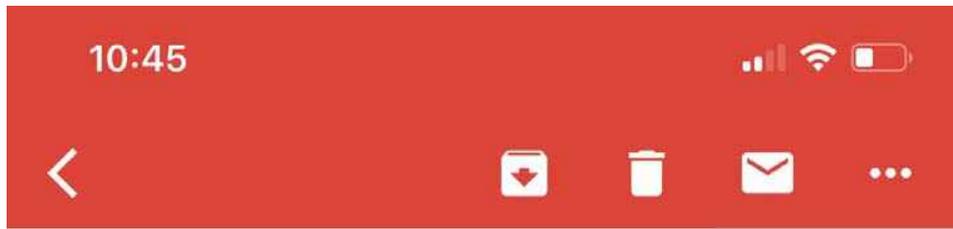
The all in cost will be around 10k (not including flight) Just wanted you to know.

Per our last discussion re the dogs travel..... I should proceed... Right?

They would be able to travel at the end of April with a 10 day quarantine upon arrival. Delivery to the house somewhere around may 7th (est).

K





AH



to me

Mar 31, 2015 [View details](#)

I'm sorry but as I understood it, they weren't able to travel with J. and since they couldn't travel with him, they won't be able to go at all. no?

So what process needs to be continued exactly?



me



to AH

Mar 31, 2015 [View details](#)

We never concluded the original conversation other than you saying "no" to cargo.

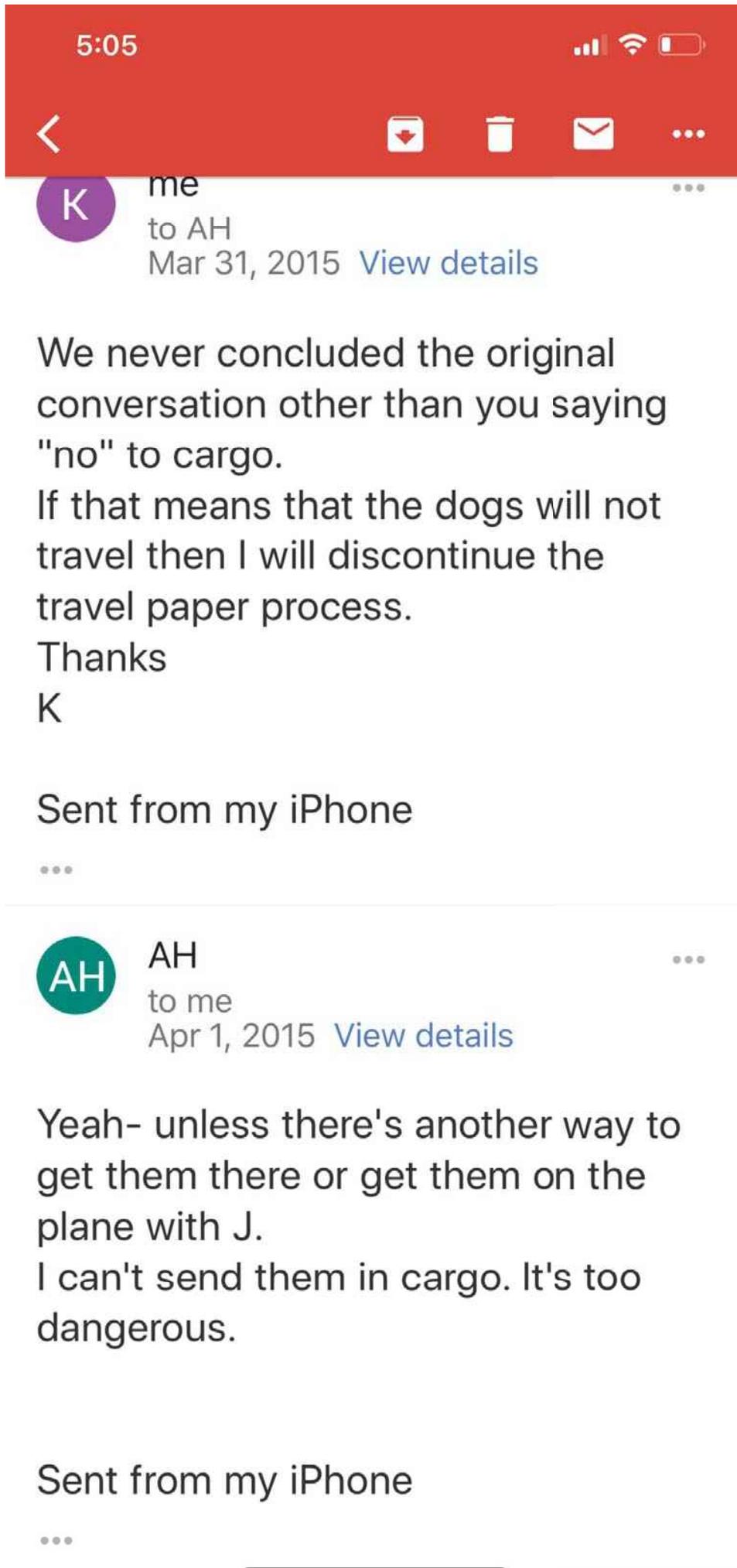
If that means that the dogs will not travel then I will discontinue the travel paper process.

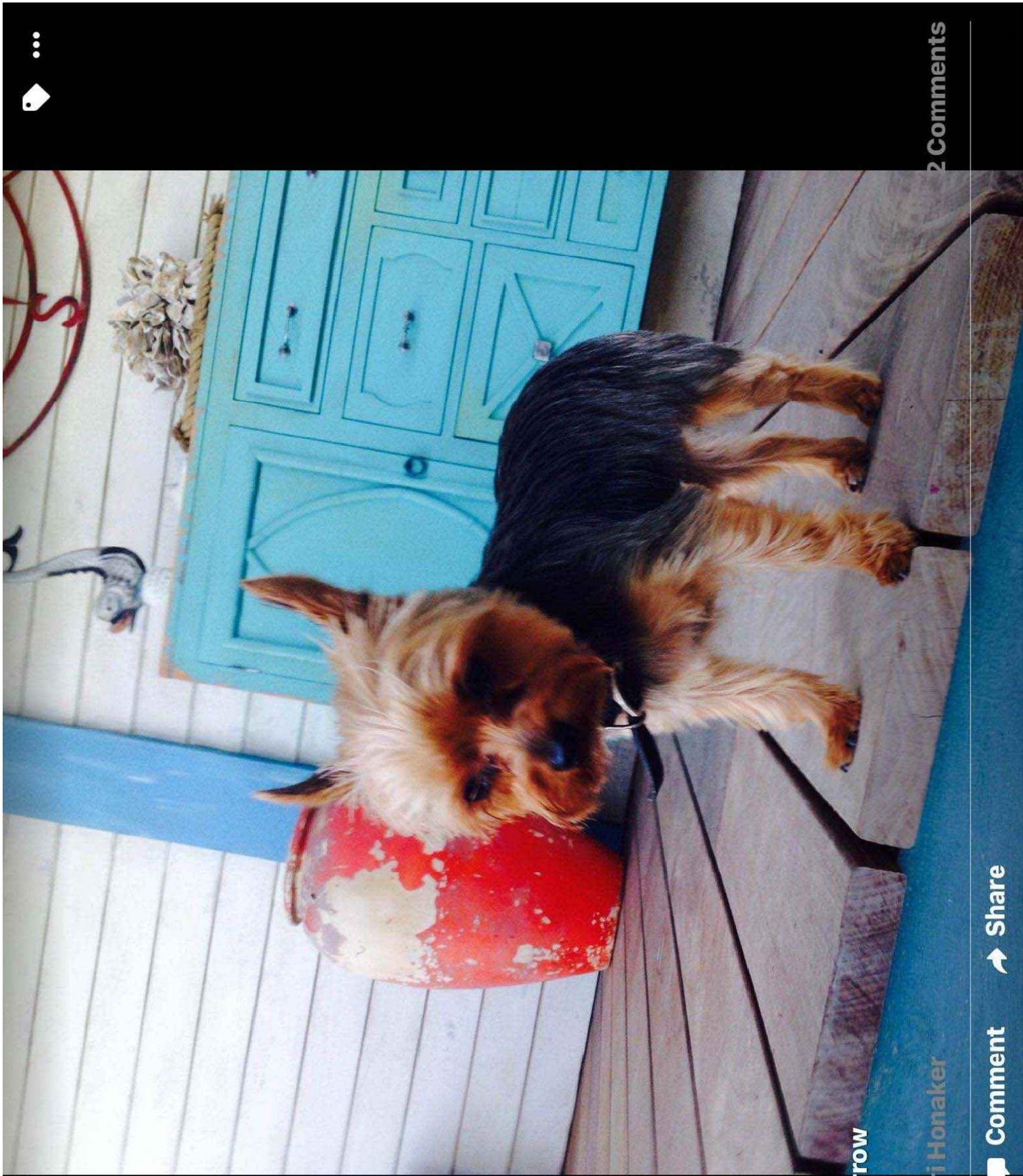
Thanks

K

Sent from my iPhone







2 Comments

Steven F Farrow

JUL 7, 2014

Sarah Mari Honaker





Apr 20, 2015, 8:45 PM

Amber knew all about the Dog situation, right?

they've landed...haven't heard anything yet

dogs are in

Apr 20, 2015, 10:45 PM

Yes. She knows.

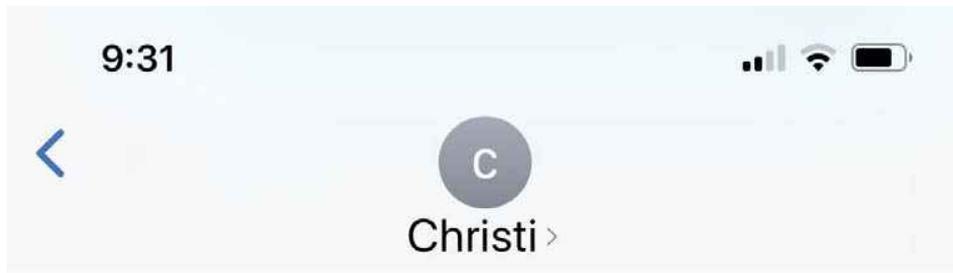
Apr 21, 2015, 9:25 PM

did you get all the



iMessage





Apr 20, 2015, 5:24 PM

Hi.  
Just an fyi. They took  
the dogs without the  
proper paperwork.

Apr 22, 2015, 11:41 AM

Morning. Just an fyi.  
Billy at 80 since yes-  
terday.  
12 people on Monday  
til 4am. 20 people  
last night... 12 arriv-  
ing after 2 am til 5am.



B



**Privileged and Confidential**

**STATEMENT OF KEVIN MURPHY**

I, Kevin Murphy, state as follows:

1. I am currently, and have been, an estate manager and assistant to Johnny Depp for many years. I have personal and firsthand knowledge of the matters set forth in this Statement, and if called as a witness, could and would testify competently thereto under oath.

2. Among other household responsibilities, one of my obligations is to assist Mr. Depp in the preparation of necessary travel-related paperwork for the household dogs, Pistol and Boo. This includes submitting the proper applications, making sure the dogs receive the proper vaccinations and certifications, and obtaining any necessary permits to allow transport of the dogs into foreign countries. On other occasions, Mrs. Depp's assistant, Kate James, would be responsible for obtaining the necessary travel-related paperwork for the dogs.

3. Over the years, I have been involved in obtaining the necessary travel-related paperwork for the dogs to travel to the United Kingdom, France, the Commonwealth of the Bahamas, Canada, and Brazil.

4. It is a household policy that neither Mr. Depp nor Mrs. Depp travel with the dogs unless all the proper travel-related paperwork has been completed and prior approval is obtained from the country of destination. In connection therewith, it is a household policy to arrange all the necessary travel-related paperwork for the dogs to legally travel with Mr. Depp and Mrs. Depp, and only inform Mr. Depp or Mrs. Depp about the arrangements if the necessary travel-related paperwork could not be obtained. If the necessary travel-related paperwork could not be obtained, either Ms. James or I would notify Mr. Depp and Mrs. Depp. Otherwise, Mr. Depp and Mrs. Depp would not be notified. In fact, there have been several instances when the dogs did

not travel internationally because the necessary travel-related paperwork could not be obtained in time, including a cancelled trip to the United Kingdom in August 2015.

5. Although Mrs. Depp initially instructed me to make arrangements for the dogs to travel to Australia in April 2015, it was Ms. James, an Australian citizen, who assumed the primary responsibility for preparing the necessary travel-related paperwork to permit the dogs to travel with Mrs. Depp to Australia. However, prior to the trip to Australia, Mrs. Depp terminated Ms. James' employment. Nevertheless, I was under the impression that prior to her termination, Ms. James had arranged for all necessary travel-related paperwork for the dogs to legally travel to Australia. Ms. James never indicated otherwise.

6. Per the household policy, Mr. Depp and Mrs. Depp would not have traveled with the dogs to Australia if they didn't believe all the necessary travel-related paperwork had been completed and approved.

Executed this 13<sup>th</sup> day of October, 2015, at Los Angeles, California.



Handwritten signature of Kevin Murphy in black ink, written over a horizontal line.

KEVIN MURPHY



Halpern May Ybarra Gelberg LLP  
550 South Hope Street, Suite 2330  
Los Angeles, California 90071  
(213) 402-1900 – telephone  
(213) 402-1901 – facsimile  
[www.halpernmay.com](http://www.halpernmay.com)

Grant B. Gelberg  
(213) 402-1940– direct dial  
[grant.gelberg@halpernmay.com](mailto:grant.gelberg@halpernmay.com)

June 22, 2020

**VIA EMAIL**

*Kevin Murphy*  
([m.kevin.murphy@gmail.com](mailto:m.kevin.murphy@gmail.com))

Re: Representation

Dear Kevin:

This letter confirms that my law firm represented you in 2016 in connection with Johnny Depp and Amber Heard's criminal case then-pending in Australia. That represented concluded in August 2016.

Very truly yours,

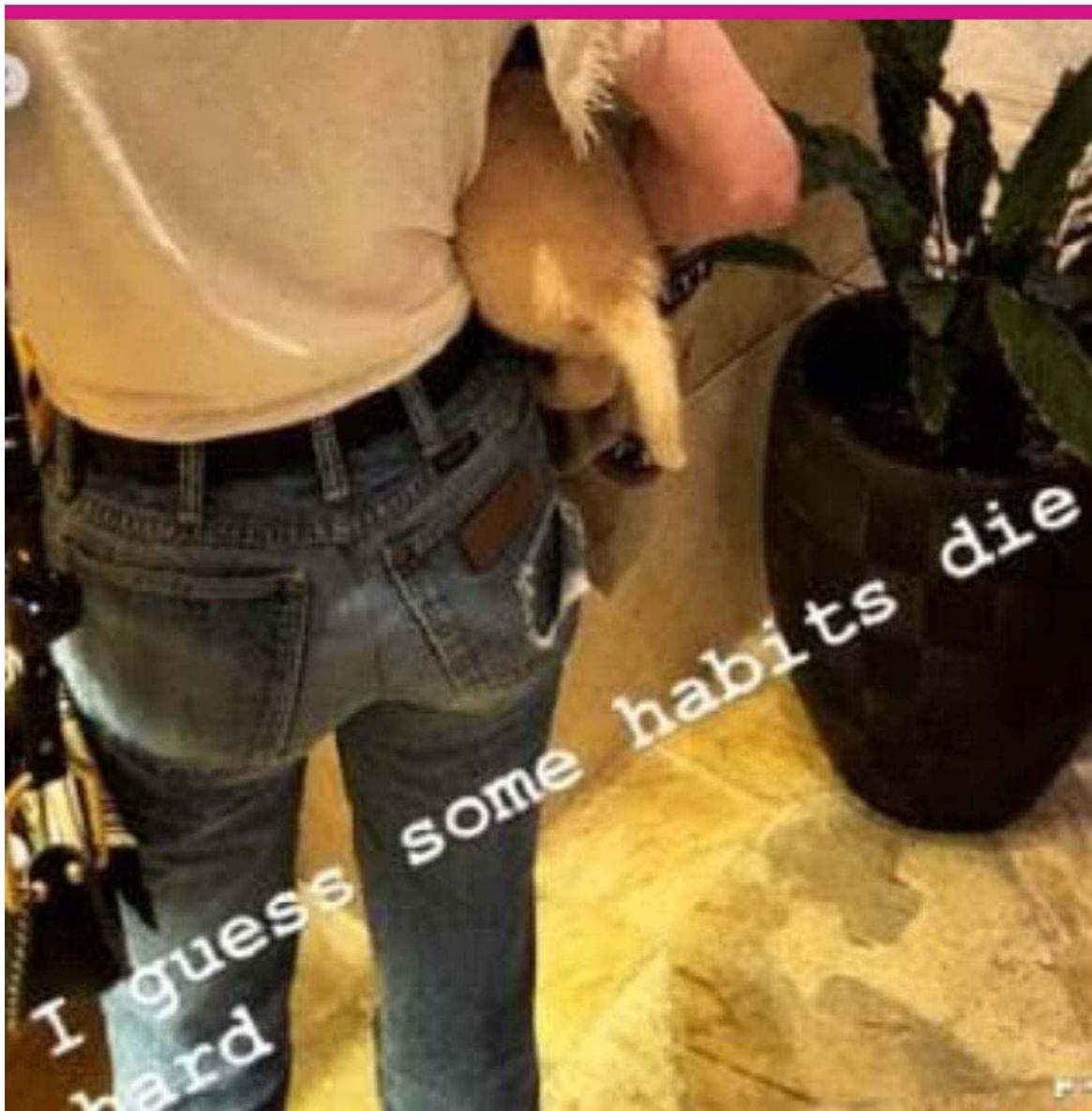
*/s/ Grant B. Gelberg*

Grant B. Gelberg  
HALPERN MAY YBARRA GELBERG LLP

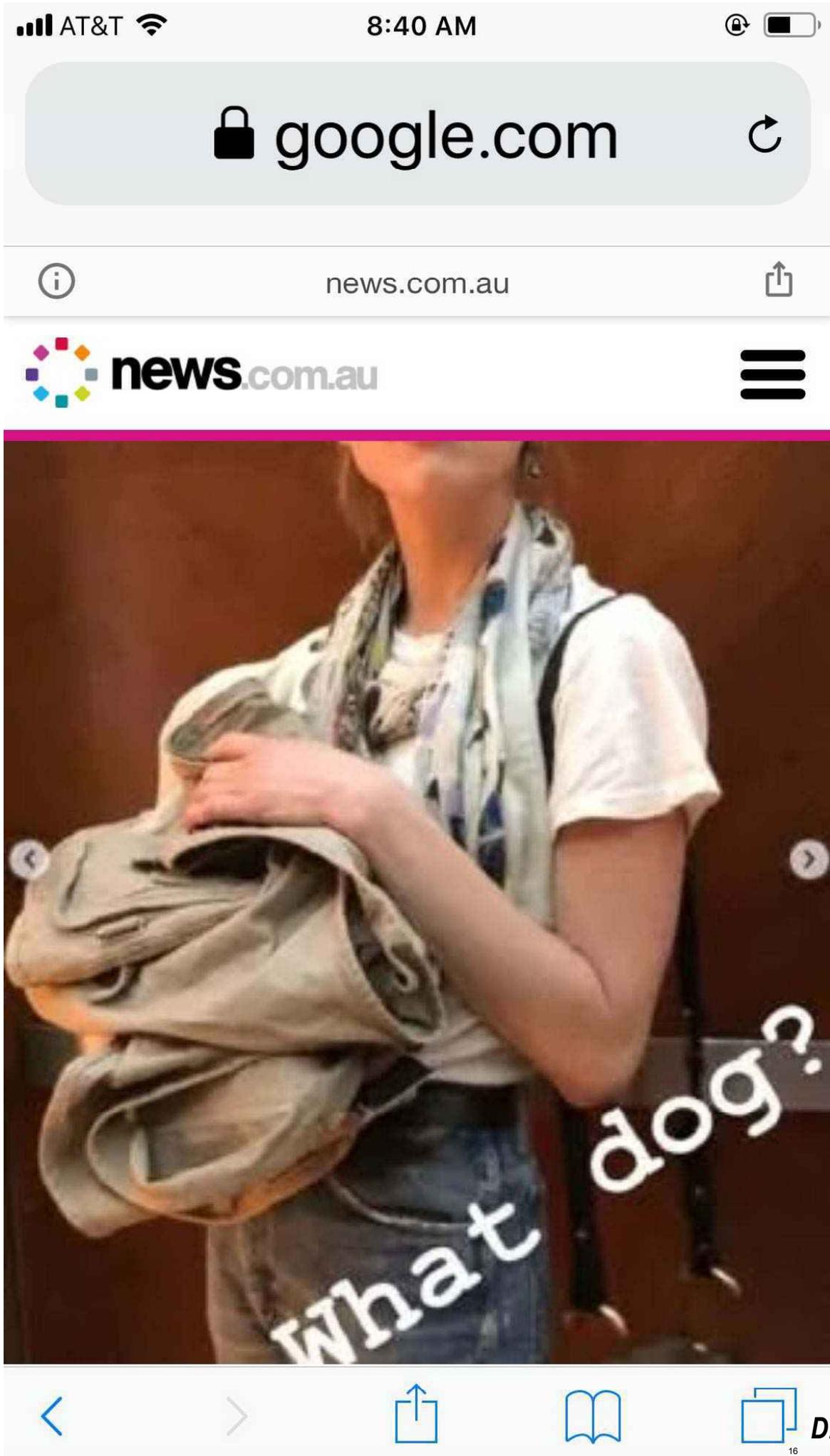
google.com

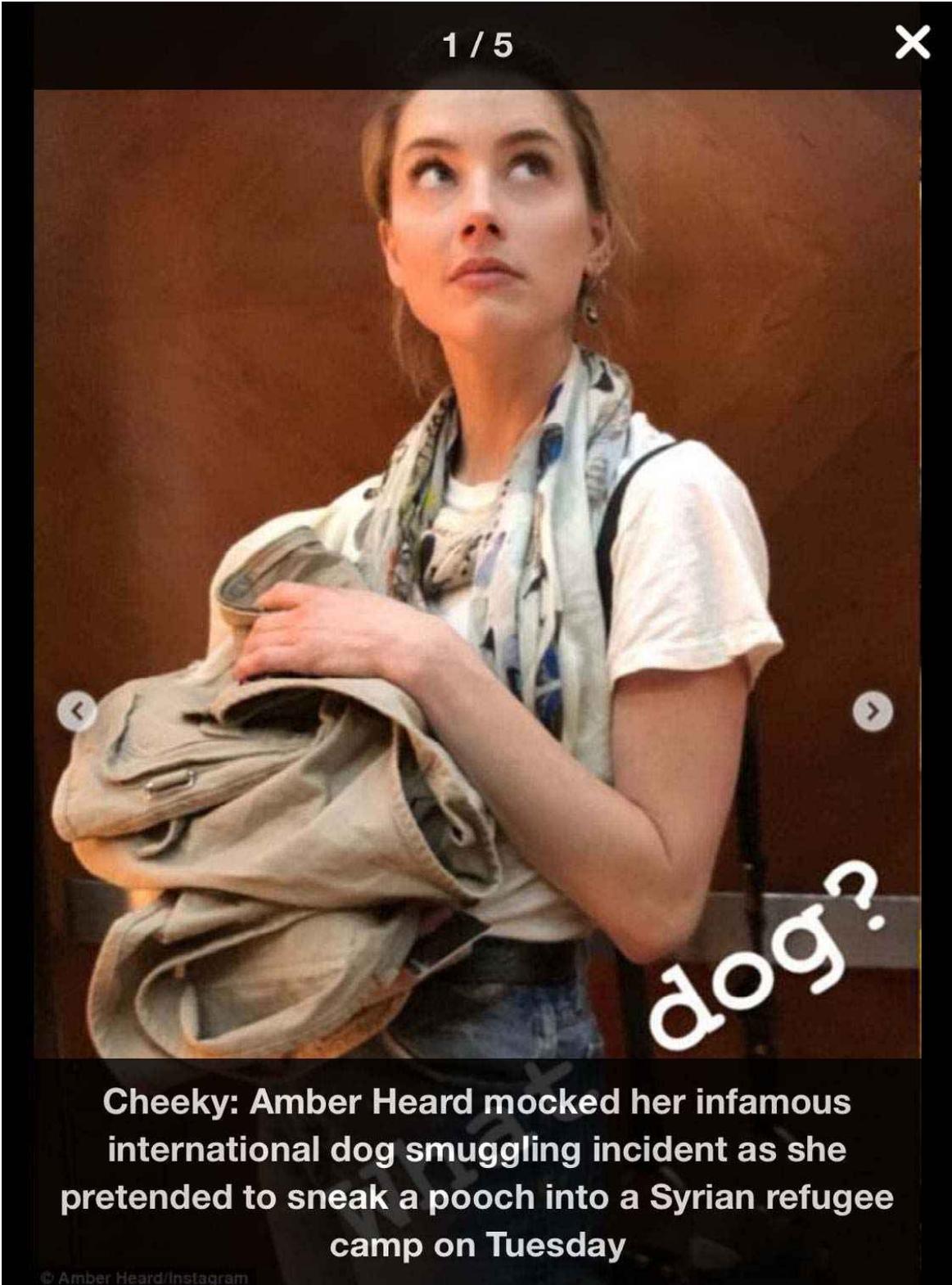
news.com.au

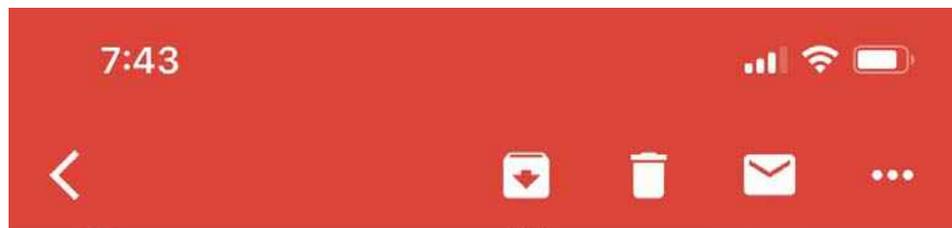
news.com.au



Amber Heard mocks the Australian dog smuggling scandal. Picture: Instagram Source: Supplied







Kate James



to Nathan, Kristy, Christi, Steph...  
[Hide details](#)

From Kate James  
amberheardasst@gmail.com

To Nathan Holmes nh@infinitem-  
nihil.com

Cc Kristy Woods  
Kristy@transexec.com

Christi Dembrowski cd@infinitem-  
nihil.com

Stephen Deuters sd@infinitem-  
nihil.com

Trudy Salven Travel  
trudy.salven@altour.com

jerry Judge jerry@jerryjudge.com

Kevin Murphy  
m.kevin.murphy@gmail.com

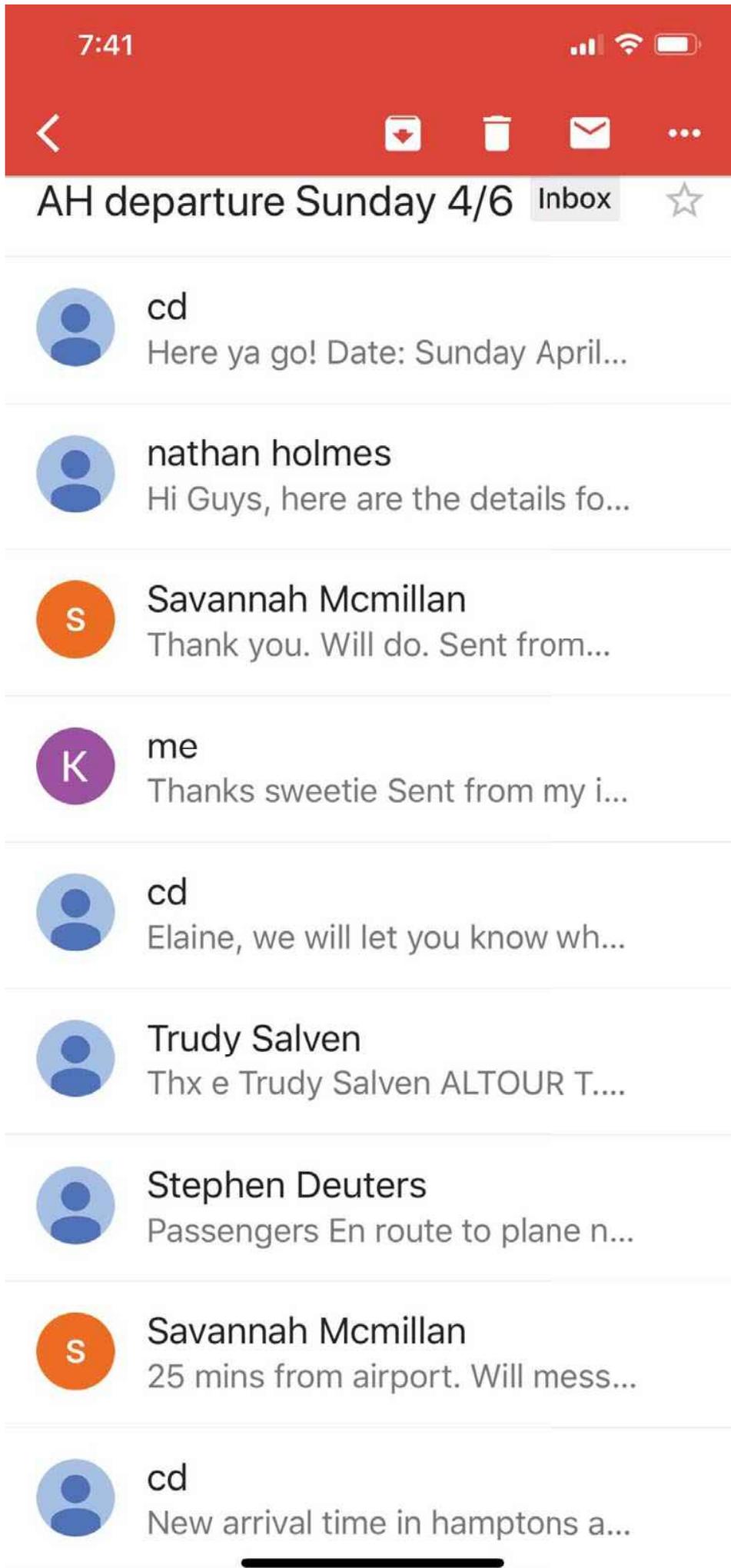
Malcolm Connolly  
malcolmconnolly@yahoo.co.uk

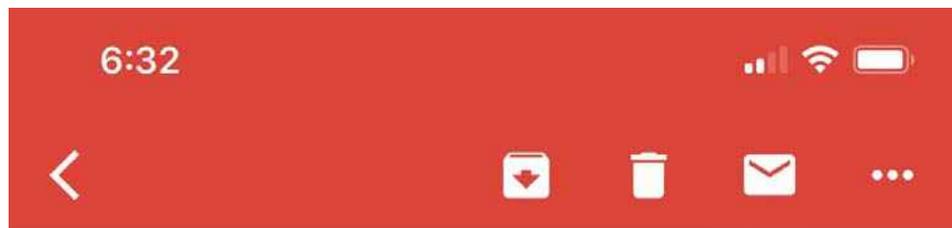
Savannah Amber Assistant London  
sav.mcmillan@hotmail.co.uk

Date Apr 20, 2014, 8:59 PM



**D237.27**





nathan holmes



to Malcolm, Sean, Stephen, sav...  
[Hide details](#)

From nathan holmes nh@infinitem-nihil.com

To Malcolm Connolly  
malcolmconnolly@yahoo.co.uk  
Sean Security Jd  
sbett51453@gmail.com

Cc Stephen Deuters sd@infinitem-nihil.com

savannah McMillan  
sav.mcmillan@hotmail.co.uk

KM Murphy  
m.kevin.murphy@gmail.com

Leonard Damian  
lendamian66@gmail.com

christi dembrowski cd@infinitem-nihil.com

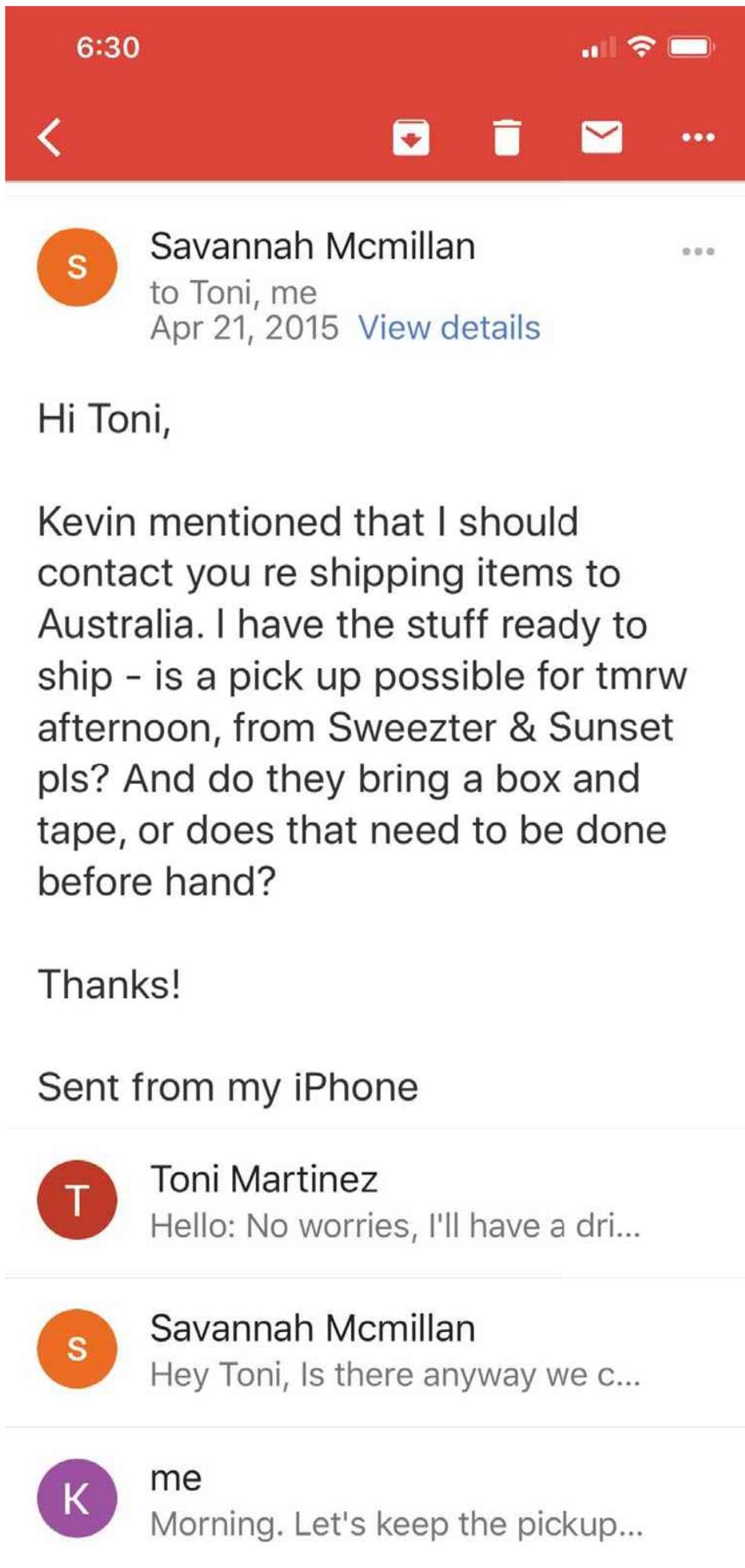
Debbie Lloyd  
DebbielloydRN@gmail.com

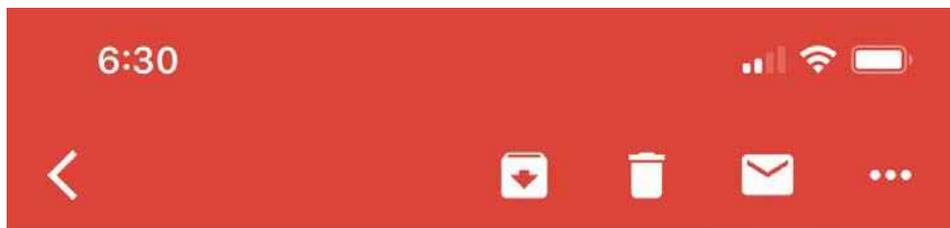
Date May 26, 2015, 7:27 PM

Hi All,

Heres the plan for tomorrow.

**D237.29**





Savannah Mcmillan



to Toni, me

Apr 10, 2015 [View details](#)

Hi Toni,

I spoke to Kevin and was wondering if it's okay to have some boxes picked up from the Corinthia Hotel, in London. The boxes are all marked with addresses. 1 large box is to go to LA, the one to Paige Heard is to go to Texas, and the one to Mara Russo to go to Mississippi, and 2 to go to Egham (in the UK - about 15 mins from the courier base at Heathrow airport). Is that all okay? The boxes are currently with the concierge at The Corinthia hotel (Whitehall place).

Let me know if there's any probs!

Sent from my iPhone

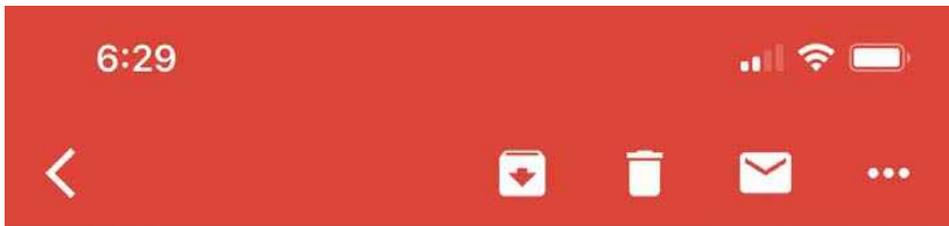
3



Toni Martinez

Everything shipping out Monda...

**D237.31**



AH



to me

Mar 28, 2015 [View details](#)

That's great! Thanks. as long as they can hold it for us Sav, then I'm happy.

Thanks Kevin!

Sorry for the trouble. I need to have that medication close by in case I need it. so it's best if it's here in Europe. Thanks!!



Savannah Mcmillan



to me, AH

Mar 28, 2015 [View details](#)

Sure, no prob will do.

Sent from my iPhone



Savannah Mcmillan

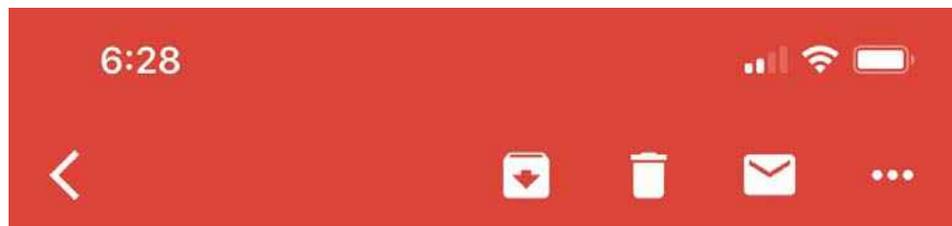


to me, AH

Mar 28, 2015 [View details](#)

Just checked with Amber and to  
the London address below would

**D237.32**



me



to Savannah, AH

Mar 28, 2015 [View details](#)

Hi Savannah.

I have a small box that contains some items for Amber. Can you provide me with appropriate shipping instructions please.

Thanks

K

Sent from my iPhone



Savannah Mcmillan



to me, AH

Mar 28, 2015 [View details](#)

Hello Kevin!

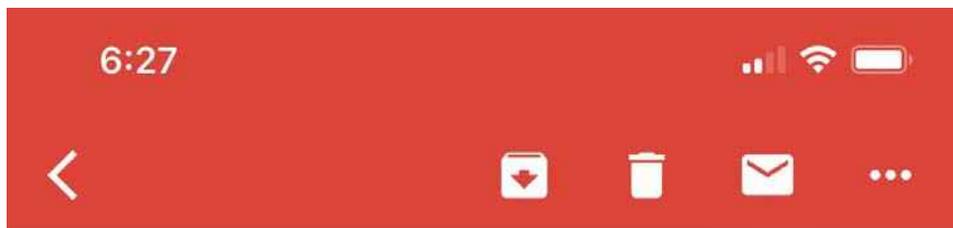
Of course. We are in Denmark until the 2nd, so best to send it to be kept safely in the London production office.. If it's not urgently needed.

The address is -

THE DANISH GIRL

Kvinde Films Ltd | Rm 41 John

**D237.33**



Savannah Mcmillan



to Trudy, me, Amber  
Feb 21, 2015 [View details](#)

Hi Trudy,

Just checking in, does Amber have the transport arranged when she lands in LA? Or should I liaise with Kevin?

Thanks.

Sent from my iPhone



Trudy Salven



to Savannah, me, Amber  
Feb 21, 2015 [View details](#)

She does. Rep and music under ms slim. She knows. Thx

Sent from my iPhone



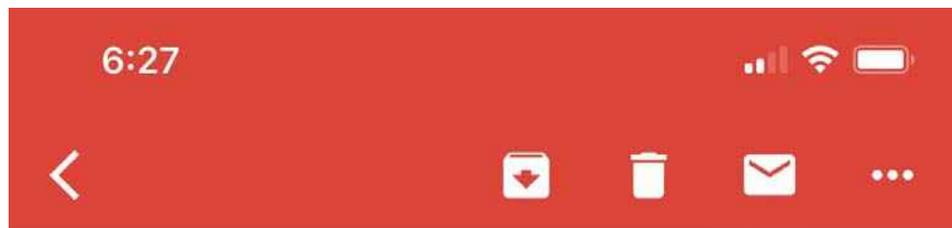
Reply



Reply all



Forward



Savannah Mcmillan



to Kate, me, AMBER  
Feb 5, 2015 [View details](#)

Hi all,

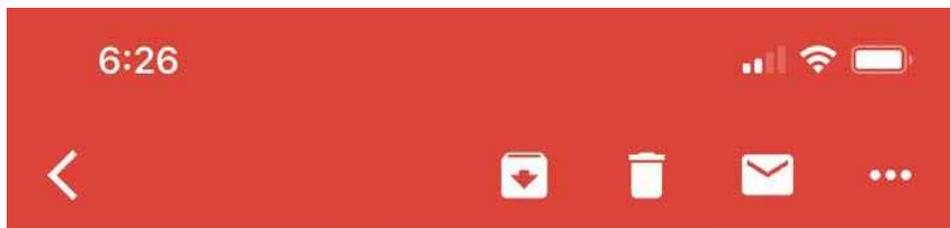
All 5 suitcases are set to arrive at the London production office on Monday 9th, each suitcase is labelled with my name on. The address:

FAO HARRIET WORTH  
Kvinde Films Ltd  
Room 41, John Maxwell Buiding  
Elstree Film Studios  
Shenley Road  
Borehamwood  
Herts  
WD6 1JG

Her contact info: [020 8324 2140](tel:02083242140)  
[07814 376 293](tel:07814376293)

Thanks guys!

Sent from my iPhone



Savannah

to me

Dec 3, 2014 [View details](#)

Hey Kevin,

Hope you had a lovely thanksgiving. Ours was wonderful, thank you so much for all you did making it so special. The food was delicious too.

Also, wanted to check in - did you get this email?

On 27 Oct 2014, at 16:14,  
 Savannah Mcmillan  
 <[sav.mcmillan@hotmail.co.uk](mailto:sav.mcmillan@hotmail.co.uk)>  
 wrote:

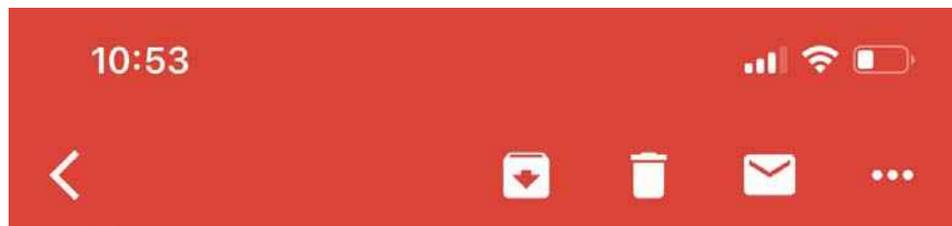
> My card info -

>

> [4117 7339 5581 4312](tel:4117733955814312)

>

**D237.36**



Savannah Mcmillan



to Kristy, me

Mar 17, 2016 [View details](#)

Hello Kristy,

Just wanted to introduce myself; I'm Savannah - Amber Heard's assistant. Nice to e-meet you! Please feel free to contact me with any questions/ queries, and let me know if I can help at all over the next few days. I wanted to check in on Amber's packages that are arriving today via Excalibur. You should be expecting a suitcase and a large garment bag (two items in total), they should be arriving at the production address, addressed to 'Savannah Mcmillan' / 'Slim'.

Please let me know once they have arrived safely.

Looking forward to meeting you guys.

Thanks

**D237.37**

s. 37(1)(a), s. 22(1)(a)(ii)

s. 37(1)(a), s. 22(1)(a)(ii)

s. 37(1)(a), s. 22(1)(a)(ii)

**s. 37(1)(a), s. 22(1)(a)(ii)**

**s. 37(1)(a), s. 22(1)(a)(ii)**

**s. 37(1)(a), s. 22(1)(a)(ii)**

**s. 37(1)(a), s. 22(1)(a)(ii)**

# S. 37(1)(a)

s. 37(1)(a)

# s. 37(1)(a)

**s. 37(1)(a)**

# s. 37(1)(a)

**s. 37(1)(a)**

# s. 37(1)(a)

**s. 37(1)(a)**

# s. 37(1)(a)

# s. 37(1)(a)

**s. 37(1)(a)**

# s. 37(1)(a)

**s. 37(1)(a)**

# s. 37(1)(a)

**s. 37(1)(a)**

**s. 37(1)(a)**

**s. 37(1)(a)**

# s. 37(1)(a)

# s. 37(1)(a)

# s. 37(1)(a)

**s. 37(1)(a)**

# s. 37(1)(a)

# s. 37(1)(a)

s. 22(1)(a)(ii), s. 37(1)(a), s. 47F(1)

**s. 22(1)(a)(ii), s. 37(1)(a), s. 47F(1)**

s. 22(1)(a)(ii), s. 37(1)(a), s. 47F(1)

# s. 37(1)(a)

s. 22(1)(a)(ii), s. 37(1)(a), s. 47F(1)

s. 22(1)(a)(ii), s. 37(1)(a), s. 47F(1)

s. 22(1)(a)(ii), s. 37(1)(a), s. 47F(1)

# s. 37(1)(a)

**s. 22(1)(a)(ii); s. 37(1)(a); s. 47F(1)**

s. 22(1)(a)(ii), s. 37(1)(a), s. 47F(1)

s. 22(1)(a)(ii), s. 37(1)(a), s. 47F(1)

s. 22(1)(a)(ii), s. 37(1)(a), s. 47F(1)

**s. 37(1)(a); s. 47F(1)**

**s. 37(1)(a)**

s. 22(1)(a)(ii); s. 37(1)(a); s. 47F(1)

s. 22(1)(a)(ii); s. 37(1)(a); s. 47F(1)

s. 22(1)(a)(ii); s. 37(1)(a); s. 47F(1)

s. 22(1)(a)(ii), s. 37(1)(a), s. 47F(1)

s. 22(1)(a)(ii), s. 37(1)(a), s. 47F(1)

s. 22(1)(a)(ii); s. 37(1)(a); s. 47F(1)

**s. 37(1)(a)**

**s. 37(1)(a)**

s. 22(1)(a)(ii); s. 37(1)(a); s. 47F(1)

# s. 37(1)(a)

s. 22(1)(a)(ii); s. 37(1)(a); s. 47F(1)

# s. 37(1)(a)

s. 22(1)(a)(ii), s. 37(1)(a), s. 47F(1)

s. 22(1)(a)(ii), s. 37(1)(a), s. 47F(1)

s. 22(1)(a)(ii), s. 37(1)(a), s. 47F(1)

s. 22(1)(a)(ii); s. 37(1)(a); s. 47F(1)

**s. 37(1)(a)**

s. 22(1)(a)(ii); s. 37(1)(a); s. 47F(1)

s. 22(1)(a)(ii); s. 37(1)(a); s. 47F(1)

**s. 37(1)(a)**

s. 22(1)(a)(ii); s. 37(1)(a); s. 47F(1)

**s. 37(1)(a); s. 47F(1)**

s. 22(1)(a)(ii); s. 37(1)(a); s. 47F(1)

s. 22(1)(a)(ii), s. 37(1)(a), s. 47F(1)

s. 22(1)(a)(ii), s. 37(1)(a), s. 47F(1)

**s. 22(1)(a)(ii); s. 37(1)(a); s. 47F(1)**

# s. 37(1)(a)

# s. 37(1)(a)

s. 22(1)(a)(ii); s. 37(1)(a); s. 47F(1)

s. 22(1)(a)(ii), s. 37(1)(a), s. 47F(1)

**s. 22(1)(a)(ii), s. 37(1)(a), s. 47F(1)**

**s. 22(1)(a)(ii); s. 37(1)(a); s. 47F(1)**

# s. 37(1)(a)

# s. 37(1)(a)

s. 22(1)(a)(ii); s. 37(1)(a); s. 47F(1)

**s. 22(1)(a)(ii), s. 37(1)(a), s. 47F(1)**

**s. 37(1)(a); s. 47F(1)**

**s. 37(1)(a)**

s. 22(1)(a)(ii); s. 37(1)(a); s. 47F(1)

s. 22(1)(a)(ii), s. 37(1)(a), s. 47F(1)

s. 22(1)(a)(ii), s. 37(1)(a), s. 47F(1)

s. 22(1)(a)(ii), s. 37(1)(a), s. 47F(1)

# s. 37(1)(a)

**s. 22(1)(a)(ii); s. 37(1)(a); s. 47F(1)**

**s. 37(1)(a); s. 47F(1)**

s. 22(1)(a)(ii); s. 37(1)(a); s. 47F(1)

s. 22(1)(a)(ii), s. 37(1)(a), s. 47F(1)

# s. 37(1)(a)

**s. 22(1)(a)(ii); s. 37(1)(a); s. 47F(1)**

s. 22(1)(a)(ii), s. 37(1)(a), s. 47F(1)

**s. 22(1)(a)(ii); s. 37(1)(a); s. 47F(1)**

# s. 37(1)(a)

s. 22(1)(a)(ii); s. 37(1)(a)

**s. 22(1)(a)(ii); s. 37(1)(a)**

s. 22(1)(a)(ii), s. 37(1)(a), s. 47F(1)

s. 22(1)(a)(ii), s. 37(1)(a), s. 47F(1)

# s. 37(1)(a)

s. 22(1)(a)(ii); s. 37(1)(a); s. 47F(1)

s. 22(1)(a)(ii), s. 37(1)(a), s. 47F(1)

s. 22(1)(a)(ii), s. 37(1)(a), s. 47F(1)

**s. 37(1)(a); s. 47F(1)**

**s. 37(1)(a)**

**DEPARTMENT OF AGRICULTURE, FISHERIES AND FORESTRY**

Division: Compliance and Investigations Division

**CID02****ILLEGAL IMPORTATION OF LIVE DOGS BY JOHNNY DEPP AND AMBER HEARD****CURRENT ISSUE**

The Department of Agriculture, Fisheries and Forestry had previously completed an investigation into the importation into Australia of two dogs ('Pistol and Boo') owned by Hollywood actor Johnny Depp and his then wife Amber Heard.

Information has since come to hand, via a London Libel case, that Amber Heard may have provided false testimony to the court in relation to her knowledge of Australia's biosecurity laws; and that another person in the case falsified a statutory declaration under duress of losing his job.

**KEY FACTS AND RESPONSES**

- To protect the integrity of the investigation and the department's investigative processes, the department does not comment on ongoing investigations. The department treats information obtained through an investigation as confidential. We do not comment on the details of an investigation, including investigation methodology or approach.
- The department is aware of the testimony tendered during the libel case sentence hearing and is investigating whether the revelations have implications for its treatment of the biosecurity breach
- Committing perjury, in support of a breach of Australia's biosecurity requirements, is seen as a serious breach of Australia's judicial system and processes.

**ADDITIONAL INFORMATION**

- During the sentencing proceedings of the London libel case, Ms Heard's legal representative tendered a range of material, including an affidavit of Ms Heard, dated 17 April 2016, and a statutory declaration of Mr Kevin Murphy, dated 14 April 2016.

Contact Officer: Anna Brezzo  
Telephone: **s. 47F(1)**  
Last updated: 18 January 2023

SES Lead: Peter Timson  
Mobile Number: **s. 47F(1)**  
SB23-000071

- Australian investigators have no authority to conduct formal investigations in another country. Formal investigations that need to be conducted in a foreign country, to obtain admissible evidence, must be done pursuant to a request from the Australian Government under the Mutual Assistance in *Criminal Matters Act 1987*.

s. 37(1)(a)

- It is important to note that the biosecurity risks associated with the illegal import of Ms Heard's dogs were effectively managed at the time of import (in 2015).
- The witness, Mr Murphy advised the department that following evidence given in the London libel case, he was issued with a subpoena on 14 October 2021 by Mr Depp's legal team. This subpoena required him to provide all material he holds relating to the importation of the dogs into Australia in 2015, including all correspondence between Mr Murphy and the department, from the time of the first contact in March 2021, to the proposed date of the libel hearing in the United States of America in April 2022.

# s. 37(1)(a)

- Other than some staffing costs, the cost of conducting the investigation to this point is minimal as the department is primarily utilising the resources of other Commonwealth departments to progress the investigation.

## DEPARTMENT OF AGRICULTURE, WATER AND THE ENVIRONMENT

Division: Compliance and Enforcement Division (CED)

**CED05****ILLEGAL IMPORTATION OF LIVE DOGS BY AMBER HEARD****CURRENT ISSUE**

The Department of Agriculture, Water and the Environment had previously completed an investigation into the importation into Australia of two dogs ('*Pistol and Boo*') owned by Hollywood actor Johnny Depp and his then wife Amber Heard. Information has since come to hand via a London Libel case that Amber Heard may have provided false testimony to the court in relation to her knowledge of Australia's Biosecurity laws.

The department is aware of current media reports concerning the prosecution of Ms Amber Heard in Australia in 2016.

**KEY FACTS AND RESPONSES**

- During the sentencing proceedings Ms Heard's legal representative tendered a range of material including an affidavit of Ms Heard dated 17 April 2016, and a statutory declaration of Mr Kevin Murphy dated 14 April 2016.

**s. 37(1)(a)**

- Australian investigators have no authority to conduct formal investigations in another country. Formal investigations that need to be conducted in a foreign country, to obtain admissible evidence, must be done pursuant to a request from the Australian Government under the *Mutual Assistance in Criminal Matters Act 1987*.<sup>s. 37(1)(a)</sup>

This is a lengthy process and is reliant on overseas law enforcement agencies working on the department's behalf.

**s. 37(1)(a)**

- Committing perjury, in support of a breach of Australia's biosecurity requirements is seen as a serious breach of Australia's judicial system and processes.
- It is important to note that the biosecurity risks associated with the illegal import of Ms Heard's dogs were effectively managed at the time of import (in 2015).

Contact Officer: s. 22(1)(a)(ii)  
Telephone: s. 22(1)(a)(ii)  
Last updated: 09/03/2022

SES Lead: Anna Brezzo  
Mobile Number: s. 47F(1)  
SB21-000626

**ADDITIONAL INFORMATION**

- Mr Murphy has advised the department that following evidence given in the London Libel case, he was issued with a subpoena on 14 October 2021 by Mr Depp's legal team. This subpoena requires him to provide all material he holds relating to the importation of the dogs into Australia in 2015. The department understands that this will require production of all correspondence between Mr Murphy and the department.

# s. 37(1)(a)

- Other than some staffing costs, the cost of conducting the investigation to this point is minimal as the department is primarily utilising the resources of other Commonwealth departments to progress the investigation.
- As this matter is the subject of a current investigation the department is unable to provide any further comment.

**DEPARTMENT OF AGRICULTURE, FISHERIES AND FORESTRY**

Division: Compliance and Enforcement Division

**CED02****ILLEGAL IMPORTATION OF LIVE DOGS BY JOHNNY DEPP AND AMBER HEARD****CURRENT ISSUE**

The Department of Agriculture, Fisheries and Forestry had previously completed an investigation into the importation into Australia of two dogs ('Pistol and Boo') owned by Hollywood actor Johnny Depp and his then wife Amber Heard.

Information has since come to hand, via a London Libel case, that Amber Heard may have provided false testimony to the court in relation to her knowledge of Australia's Biosecurity laws; and that another person in the case falsified a statutory declaration under duress of losing his job.

**KEY FACTS AND RESPONSES**

- To protect the integrity of the investigation and the department's investigative processes, the department does not comment on ongoing investigations. The department treats information obtained through an investigation as confidential. We do not comment on the details of an investigation, including investigation methodology or approach.
- The department is aware of the testimony tendered during the libel case sentence hearing and is investigating whether the revelations have implications for its treatment of the Biosecurity breach
- Committing perjury, in support of a breach of Australia's biosecurity requirements, is seen as a serious breach of Australia's judicial system and processes.

**ADDITIONAL INFORMATION**

- During the sentencing proceedings of the London libel case, Ms Heard's legal representative tendered a range of material, including an affidavit of Ms Heard, dated 17 April 2016, and a statutory declaration of Mr Kevin Murphy, dated 14 April 2016.

Contact Officer: Anna Brezzo, Investigations  
Telephone: **s. 47F(1)**  
Last updated: 13 October 2022

SES Lead: Peter Timson  
Mobile Number: **s. 47F(1)**  
SB22-000062

- Australian investigators have no authority to conduct formal investigations in another country. Formal investigations that need to be conducted in a foreign country, to obtain admissible evidence, must be done pursuant to a request from the Australian Government under the Mutual Assistance in *Criminal Matters Act 1987*.<sup>s. 37(1)(a)</sup>
- It is important to note that the biosecurity risks associated with the illegal import of Ms Heard's dogs were effectively managed at the time of import (in 2015).
- The witness, Mr Murphy advised the department that following evidence given in the London libel case, he was issued with a subpoena on 14 October 2021 by Mr Depp's legal team. This subpoena required him to provide all material he holds relating to the importation of the dogs into Australia in 2015, including all correspondence between Mr Murphy and the department, from the time of the first contact in March 2021, to the proposed date of the libel hearing in the United States of America in April 2022.

s. 37(1)(a)

- Other than some staffing costs, the cost of conducting the investigation to this point is minimal as the department is primarily utilising the resources of other Commonwealth departments to progress the investigation.

## DEPARTMENT OF AGRICULTURE, WATER AND THE ENVIRONMENT

Division: Compliance and Enforcement Division (CED)

**CED05****ILLEGAL IMPORTATION OF LIVE DOGS BY AMBER HEARD****CURRENT ISSUE**

The Department of Agriculture, Water and the Environment had previously completed an investigation into the importation into Australia of two dogs ('*Pistol and Boo*') owned by Hollywood actor Johnny Depp and his then wife Amber Heard. Information has since come to hand via a London Libel case that Amber Heard may have provided false testimony to the court in relation to her knowledge of Australia's Biosecurity laws.

The department is aware of current media reports concerning the prosecution of Ms Amber Heard in Australia in 2016.

**KEY FACTS AND RESPONSES**

- During the sentencing proceedings Ms Heard's legal representative tendered a range of material including an affidavit of Ms Heard dated 17 April 2016, and a statutory declaration of Mr Kevin Murphy dated 14 April 2016.

**s. 37(1)(a)**

- Australian investigators have no authority to conduct formal investigations in another country. Formal investigations that need to be conducted in a foreign country, to obtain admissible evidence, must be done pursuant to a request from the Australian Government under the *Mutual Assistance in Criminal Matters Act 1987*.<sup>s. 37(1)(a)</sup>

**s. 37(1)(a)****s. 37(1)(a)**

- Committing perjury, in support of a breach of Australia's biosecurity requirements is seen as a serious breach of Australia's judicial system and processes.
- It is important to note that the biosecurity risks associated with the illegal import of Ms Heard's dogs were effectively managed at the time of import (in 2015).

Contact Officer: s. 22(1)(a)(ii)  
Telephone: s. 22(1)(a)(ii)  
Last updated: 09/03/2022

SES Lead: Anna Brezzo  
Mobile Number: s. 47F(1)  
SB21-000626

**ADDITIONAL INFORMATION**

- Mr Murphy has advised the department that following evidence given in the London Libel case, he was issued with a subpoena on 14 October 2021 by Mr Depp's legal team. This subpoena requires him to provide all material he holds relating to the importation of the dogs into Australia in 2015. The department understands that this will require production of all correspondence between Mr Murphy and the department.

# s. 37(1)(a)

- Other than some staffing costs, the cost of conducting the investigation to this point is minimal as the department is primarily utilising the resources of other Commonwealth departments to progress the investigation.
- As this matter is the subject of a current investigation the department is unable to provide any further comment.

**AWE**  
**QUESTION TIME BRIEF (QTB)**  
**3-09 INVESTIGATION INTO ALLEGED PERJURY RELATING TO THE ILLEGAL**  
**IMPORTATION OF LIVE DOGS**

**QUESTION:** What is the progress of the department's investigation in relation to allegations of perjury by Amber Heard?

**KEY TALKING POINTS:**

**s. 37(1)(a)**

- It is important to note that the biosecurity risks associated with the illegal import of Ms Heard's dogs were effectively managed at the time of import (in 2015).

**Further Talking Points**

- Other than some staffing costs, the cost of conducting the investigation to this point is minimal as the department is primarily utilising the resources of other Commonwealth departments to progress the investigation.
- The department views any disregard to Australia's biosecurity requirements, processes or policy and the risks posed by deliberate non-compliance as a serious matter.
- Committing perjury, in support of a breach of Australia's biosecurity requirements is seen as a serious breach of Australia's judicial system and processes.

*If asked:*

- Australian investigators have no authority to conduct formal investigations in another country. Formal investigations that need to be conducted in a foreign country, to obtain admissible evidence, must be done pursuant to a request from the Australian

**AWE**  
**QUESTION TIME BRIEF (QTB)**  
**3-09 INVESTIGATION INTO ALLEGED PERJURY RELATING TO THE ILLEGAL**  
**IMPORTATION OF LIVE DOGS**

Government under the Mutual Assistance in Criminal Matters Act 1987. This is a lengthy process and is reliant on overseas law enforcement agencies working on the department's behalf.

#### BACKGROUND AND CHRONOLOGY

- The Department of Agriculture, Water and the Environment had previously completed an investigation into the importation into Australia of two dogs (*'Pistol and Boo'*) owned by Hollywood actor Johnny Depp and his then wife Amber Heard. Information has since come to hand via a London Libel case in July 2020, that Amber Heard may have provided false testimony to the court in relation to her knowledge of Australia's Biosecurity laws.
- One witness gave evidence in the London libel proceedings that Ms Heard had asked him to swear a false document during the department's prosecution hearing.
- This witness has advised the department that he was issued a subpoena on 14 October 2021 by Mr Depp's legal team in respect to further civil matter. This subpoena requires him to provide all material he holds relating to the importation of the dogs into Australia in 2015. He understands that this will require him to produce all correspondence he has had with the department.

Contact: Peter Timson  
Division: Compliance and Enforcement Division  
Date first prepared: 3 November 2020  
Originating Source: AWE

Phone: s. 47F(1)  
Action Officer: s.22(1)(a)(ii)  
Date last Updated: 31/03/2023 3:15 PM

**AWE**  
**QUESTION TIME BRIEF (QTB)**  
**3-09 INVESTIGATION INTO ALLEGED PERJURY RELATING TO THE ILLEGAL**  
**IMPORTATION OF LIVE DOGS**

**QUESTION:** What is the progress of the department's investigation in relation to allegations of perjury by Amber Heard?

**KEY TALKING POINTS:**

**s. 37(1)(a)**

- It is important to note that the biosecurity risks associated with the illegal import of Ms Heard's dogs were effectively managed at the time of import (in 2015).

**Further Talking Points**

- Other than some staffing costs, the cost of conducting the investigation to this point is minimal as the department is primarily utilising the resources of other Commonwealth departments to progress the investigation.
- The department views any disregard to Australia's biosecurity requirements, processes or policy and the risks posed by deliberate non-compliance as a serious matter.
- Committing perjury, in support of a breach of Australia's biosecurity requirements is seen as a serious breach of Australia's judicial system and processes.

*If asked:*

- Australian investigators have no authority to conduct formal investigations in another country. Formal investigations that need to be conducted in a foreign country, to obtain admissible evidence, must be done pursuant to a request from the Australian

**AWE**  
**QUESTION TIME BRIEF (QTB)**  
**3-09 INVESTIGATION INTO ALLEGED PERJURY RELATING TO THE ILLEGAL**  
**IMPORTATION OF LIVE DOGS**

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#### BACKGROUND AND CHRONOLOGY

- The Department of Agriculture, Water and the Environment had previously completed an investigation into the importation into Australia of two dogs (*'Pistol and Boo'*) owned by Hollywood actor Johnny Depp and his then wife Amber Heard. Information has since come to hand via a London Libel case in July 2020, that Amber Heard may have provided false testimony to the court in relation to her knowledge of Australia's Biosecurity laws.
- One witness gave evidence in the London libel proceedings that Ms Heard had asked him to swear a false document during the department's prosecution hearing.
- This witness has advised the department that he was issued a subpoena on 14 October 2021 by Mr Depp's legal team in respect to further civil matter. This subpoena requires him to provide all material he holds relating to the importation of the dogs into Australia in 2015. He understands that this will require him to produce all correspondence he has had with the department.

Contact: Peter Timson  
Division: Compliance and Enforcement Division  
Date first prepared: 3 November 2020  
Originating Source: AWE

Phone: s. 47F(1)  
Action Officer: s.22(1)(a)(ii)  
Date last Updated: 31/03/2023 3:14 PM

**AWE**  
**QUESTION TIME BRIEF (QTB)**  
**3-09 INVESTIGATION INTO ALLEGED PERJURY RELATING TO THE ILLEGAL**  
**IMPORTATION OF LIVE DOGS**

**QUESTION:** What is the progress of the department's investigation in relation to allegations of perjury by Amber Heard?

**KEY TALKING POINTS:**

**s. 37(1)(a)**

- It is important to note that the biosecurity risks associated with the illegal import of Ms Heard's dogs were effectively managed at the time of import (in 2015).

**Further Talking Points**

- Other than some staffing costs, the cost of conducting the investigation to this point is minimal as the department is primarily utilising the resources of other Commonwealth departments to progress the investigation.
- The department views any disregard to Australia's biosecurity requirements, processes or policy and the risks posed by deliberate non-compliance as a serious matter.
- Committing perjury, in support of a breach of Australia's biosecurity requirements is seen as a serious breach of Australia's judicial system and processes.

*If asked:*

- Australian investigators have no authority to conduct formal investigations in another country. Formal investigations that need to be conducted in a foreign country, to obtain admissible evidence, must be done pursuant to a request from the Australian

**AWE**  
**QUESTION TIME BRIEF (QTB)**  
**3-09 INVESTIGATION INTO ALLEGED PERJURY RELATING TO THE ILLEGAL**  
**IMPORTATION OF LIVE DOGS**

Government under the Mutual Assistance in Criminal Matters Act 1987. This is a lengthy process and is reliant on overseas law enforcement agencies working on the department's behalf.

## BACKGROUND AND CHRONOLOGY

- The department had previously completed an investigation into the importation into Australia of two dogs ('*Pistol and Boo*') owned by Hollywood actor Johnny Depp and his then wife Amber Heard. Information has since come to hand via a London Libel case in July 2020, that Amber Heard may have provided false testimony to the court in relation to her knowledge of Australia's Biosecurity laws.
- One witness gave evidence in the London libel proceedings that Ms Heard had asked him to swear a false document during the department's prosecution hearing.
- This witness has advised the department that he was issued a subpoena on 14 October 2021 by Mr Depp's legal team in respect to further civil matter. This subpoena requires him to provide all material he holds relating to the importation of the dogs into Australia in 2015. He understands that this will require him to produce all correspondence he has had with the department.
- Australian investigators have no authority to conduct formal investigations in another country. Formal investigations that need to be conducted in a foreign country, to obtain admissible evidence, must be done pursuant to a request from the Australian Government under the *Mutual Assistance in Criminal Matters Act 1987*. This is a lengthy process and is reliant on overseas law enforcement agencies working on the department's behalf. **s. 37(1)(a)**

Contact: Peter Timson  
Division: Compliance and Enforcement Division  
Date first prepared: 4 February 2022  
Originating Source: AWE

Phone: **s. 47F(1)**  
Action Officer: **s.22(1)(a)(ii)**  
Date last Updated: 31/03/2023 3:05 PM

**BIOSECURITY COMPLIANCE, ENFORCEMENT AND INVESTIGATIONS****ISSUE**

“What is the Australian Government doing to ensure compliance within the agriculture portfolio?”

**s. 22(1)(a)(ii)**

# s. 22(1)(a)(ii)

## ***If asked, Amber Heard Investigation***

- The department has completed an investigation into the 2015 importation of two dogs (*'Pistol and Boo'*) owned by Hollywood actor Johnny Depp and his then wife Amber Heard.
- Information has since come to hand via a London Libel case that Ms Heard may have provided false testimony to the court in relation to her knowledge of Australia's Biosecurity laws; and that another person in the case falsified a statutory declaration under duress of losing his job.

- # s. 37(1)(a)

Committing perjury, in support of a breach of Australia's biosecurity

requirements, is seen as a serious breach of Australia's judicial system and processes.

s.22(1)(a)(ii)

s.22(1)(a)(ii)

s. 22(1)(a)(ii)

s. 22(1)(a)(ii)

**AWE**  
**QUESTION TIME BRIEF (QTB)**  
**3-09 INVESTIGATION INTO ALLEGED PERJURY RELATING TO THE ILLEGAL**  
**IMPORTATION OF LIVE DOGS**

**QUESTION:** What is the progress of the department's investigation in relation to allegations of perjury by Amber Heard?

**KEY TALKING POINTS:**

**s. 37(1)(a)**

- It is important to note that the biosecurity risks associated with the illegal import of Ms Heard's dogs were effectively managed at the time of import (in 2015).

**Further Talking Points**

- Other than some staffing costs, the cost of conducting the investigation to this point is minimal as the department is primarily utilising the resources of other Commonwealth departments to progress the investigation.
- The department views any disregard to Australia's biosecurity requirements, processes or policy and the risks posed by deliberate non-compliance as a serious matter.
- Committing perjury, in support of a breach of Australia's biosecurity requirements is seen as a serious breach of Australia's judicial system and processes.

*If asked:*

- Australian investigators have no authority to conduct formal investigations in another country. Formal investigations that need to be conducted in a foreign country, to obtain admissible evidence, must be done pursuant to a request from the Australian

**AWE**  
**QUESTION TIME BRIEF (QTB)**  
**3-09 INVESTIGATION INTO ALLEGED PERJURY RELATING TO THE ILLEGAL**  
**IMPORTATION OF LIVE DOGS**

Government under the Mutual Assistance in Criminal Matters Act 1987. This is a lengthy process and is reliant on overseas law enforcement agencies working on the department's behalf.

## BACKGROUND AND CHRONOLOGY

- The department had previously completed an investigation into the importation into Australia of two dogs ('*Pistol and Boo*') owned by Hollywood actor Johnny Depp and his then wife Amber Heard. Information has since come to hand via a London Libel case in July 2020, that Amber Heard may have provided false testimony to the court in relation to her knowledge of Australia's Biosecurity laws.
- One witness gave evidence in the London libel proceedings that Ms Heard had asked him to swear a false document during the department's prosecution hearing.
- This witness has advised the department that he was issued a subpoena on 14 October 2021 by Mr Depp's legal team in respect to further civil matter. This subpoena requires him to provide all material he holds relating to the importation of the dogs into Australia in 2015. He understands that this will require him to produce all correspondence he has had with the department.
- Australian investigators have no authority to conduct formal investigations in another country. Formal investigations that need to be conducted in a foreign country, to obtain admissible evidence, must be done pursuant to a request from the Australian Government under the *Mutual Assistance in Criminal Matters Act 1987*. This is a lengthy process and is reliant on overseas law enforcement agencies working on the department's behalf. **s. 37(1)(a)**

Contact: Peter Timson  
Division: Compliance and Enforcement Division  
Date first prepared: 4 February 2022  
Originating Source: AWE

Phone: **s. 47F(1)**  
Action Officer: **s.22(1)(a)(ii)**  
Date last Updated: 31/03/2023 3:13 PM

## Enforcement investigation – perjury, Amber Heard

### Issue

The Department of Agriculture, Water and the Environment had previously completed an investigation into the importation into Australia of two dogs (*'Pistol and Boo'*) owned by Hollywood actor Johnny Depp and his wife Amber Heard. Information has since come to hand via a London Libel case that Amber Heard may have provided false testimony to the court in relation to her knowledge of Australia's Biosecurity laws.

### Key Points

- The department is aware of recent media reports concerning the prosecution of Ms Amber Heard in Australia in 2016 and **s. 37(1)(a)**
- As this matter is the subject of a current investigation the department is unable to provide any further comment at this time.

### Background

- On 21 April 2015 two dogs, (*'Pistol and Boo'*), arrived into Australia on board a private jet which landed in Brisbane. (*If asked - accompanying the dogs were the actor and his wife, four staff and three crew members travelling to Australia from the United States*).
- The flight was cleared by a Biosecurity Officer and Immigration and Border Protection staff in a private area of the airport. There were no overt signs of animals being present and the luggage was not subject to inspection. (*If asked - all passengers and crew completed arrival declarations that declared they were not bringing animals into Australia*).
- The dogs were located on 13 May 2015 by a departmental veterinarian at a residence on the Gold Coast in Queensland. They were examined and found to be healthy. Documents produced at that time indicated the dogs satisfied rabies inoculation requirements for imported animals. The dogs were ordered into quarantine and directed to be re-exported within 72 hours or face being euthanised. The dogs were re-exported to the United States on 15 May.
- All animals imported into Australia must be imported under a valid import permit as well providing certification for Rabies vaccination. They must also undergo a period of 10 days post arrival quarantine at a government quarantine facility. At the time, the department had no record of an import permit being applied for or issued with regard to either of these dogs.
- Following the conclusion of the investigation two (2) Briefs of Evidence were compiled and forwarded to the CDPP on 12 June 2015. The briefs contained allegations that Amber Laura Heard and John Christopher Depp had illegally imported the dogs contrary to section 67.1 of the *Quarantine Act 1908* and that both had made false declarations on their IPCs contrary to section 234.1 of the *Customs Act 1901*.

- On 3 July 2015 the CDPP advised that the Commonwealth intended to issue a complaint and summons in relation to 2 counts of illegal importation contrary to subsection 67.1 of the *Quarantine Act 1908* and one count of false and misleading documentation contrary to subsection 137.2 of the Criminal Code against Heard. The CDPP further advised that no charges would be pursued in relation to Depp.
- The matter was heard at Southport Magistrates Court on 18 April 2016 by Her Honour Ms Bernadette Callaghan. The defendant Ms Amber Laura Heard entered a plea of guilty to the one count in contravention of subsection 137.2(1) of the Criminal Code. Her Honour issued a penalty of Recognisance under S19B of Crimes Act and discharged without conviction. Recognisance of \$1000 and of good behaviour of 1 month. The prosecution discontinued the two offences contrary to subsection 67(1) of the *Quarantine Act 1908*.
- During the sentencing proceedings Ms Heard's legal representative tendered a range of material including an affidavit of Ms Heard dated 17 April 2016, and a statutory declaration of Mr Kevin Murphy dated 14 April 2016.
- It has since been reported in the media that Mr James gave evidence in the London libel proceedings involving Ms Heard and Mr Depp. [s. 37\(1\)\(a\)](#)
- [s. 37\(1\)\(a\)](#)
- It should be noted that Australian investigators have no authority to conduct formal investigations in another country. Formal investigations that need to be conducted in a foreign country, to obtain admissible evidence, must be done pursuant to a request from the Australian Government under the *Mutual Assistance in Criminal Matters Act 1987*. This is a lengthy process and is reliant on overseas law enforcement agencies working on the department's behalf.
- [s. 37\(1\)\(a\)](#)

Clearing SES officer: Dr Richard Chadwick  
Telephone: 02 6272 3740  
[s. 47F\(1\)](#)

Contact officer: [s.22\(1\)\(a\)\(ii\)](#)  
Telephone: [s.22\(1\)\(a\)\(ii\)](#)  
[s.22\(1\)\(a\)\(ii\)](#)

## Enforcement Investigation – Perjury, Amber Heard

### Issue

The Department of Agriculture, Water and the Environment had previously completed an investigation into the importation into Australia of two dogs (*'Pistol and Boo'*) owned by Hollywood actor Johnny Depp and his wife Amber Heard. Information has since come to hand via a London Libel case that Amber Heard may have provided false testimony to the court in relation to her knowledge of Australia's Biosecurity laws.

### Key Points

- The department is aware of recent media reports concerning the prosecution of Ms Amber Heard in Australia in 2016 and [s. 37\(1\)\(a\)](#)
- As this matter is the subject of a current investigation the department is unable to provide any further comment at this time.

### Background

- On 21 April 2015 two dogs, (*'Pistol and Boo'*), arrived into Australia on board a private jet which landed in Brisbane. (*If asked - accompanying the dogs were the actor and his wife, four staff and three crew members travelling to Australia from the United States*).
- The flight was cleared by a Biosecurity Officer and Immigration and Border Protection staff in a private area of the airport. There were no overt signs of animals being present and the luggage was not subject to inspection. (*If asked - all passengers and crew completed arrival declarations that declared they were not bringing animals into Australia*).
- The dogs were located on 13 May 2015 by a departmental veterinarian at a residence on the Gold Coast in Queensland. They were examined and found to be healthy. Documents produced at that time indicated the dogs satisfied rabies inoculation requirements for imported animals. The dogs were ordered into quarantine and directed to be re-exported within 72 hours or face being euthanised. The dogs were re-exported to the United States on 15 May.
- All animals imported into Australia must be imported under a valid import permit as well providing certification for Rabies vaccination. They must also undergo a period of 10 days post arrival quarantine at a government quarantine facility. At the time, the department had no record of an import permit being applied for or issued with regard to either of these dogs.
- Following the conclusion of the investigation two (2) Briefs of Evidence were compiled and forwarded to the Commonwealth Director of Public Prosecutions on 12 June 2015. The briefs contained allegations that Amber Laura Heard and John Christopher Depp had illegally imported the dogs contrary to section 67.1 of the *Quarantine Act 1908* and that

both had made false declarations on their IPCs contrary to section 234.1 of the *Customs Act 1901*.

- On 3 July 2015 the CDPP advised that the Commonwealth intended to issue a complaint and summons in relation to 2 counts of Illegal Importation contrary to section 67.1 of the act and one count of false and misleading document contrary to section 137.2 of the *Criminal Code 1995 (Cwth)* against Heard. The CDPP further advised that no charges would be preferred in relation to Depp.
- The matter was heard at Southport Magistrates Court on 18 April 2016 by Her Honour Ms Bernadette Callaghan. The defendant, Ms Amber Laura Heard entered a plea of guilty to the one count of contravene s137.2 (1) of Criminal Code. Her Honour issued a penalty of Recognisance under S19B of Crimes Act and discharged without conviction. Recognisance of \$1000 and of good behaviour of 1 month. The prosecution discontinued the two offences contrary to section 67(1) of the Quarantine Act.
- During the sentencing proceedings Ms Heard's legal representative tendered a range of material including an affidavit of Ms Heard dated 17 April 2016, and a statutory declaration of Mr Kevin Murphy dated 14 April 2016.
- It has since been reported in the media that Mr James gave evidence in the London libel proceedings involving Ms Heard and Mr Depp. [s. 37\(1\)\(a\)](#)
- [s. 37\(1\)\(a\)](#)
- It should be noted that Australian investigators have no authority to conduct formal investigations in another country. Formal investigations that need to be conducted in a foreign country, to obtain admissible evidence, must be done pursuant to a request from the Australian Government under the *Mutual Assistance in Criminal Matters Act 1987*. This is a lengthy process and is reliant on overseas law enforcement agencies working on the departments behalf.

Clearing SES officer: Dr Richard Chadwick  
 Telephone: 02 6272 3740  
[s. 47F\(1\)](#)

Contact officer: [s.22\(1\)\(a\)\(ii\)](#)  
 Telephone: [s.22\(1\)\(a\)\(ii\)](#)  
[s.22\(1\)\(a\)\(ii\)](#)

s.22(1)(a)(ii)

---

**From:** Ag Media  
**Sent:** Friday, 1 July 2022 11:24 AM  
**To:** s. 47F(1) ; Ag Media  
**Cc:** media@environment.gov.au  
**Subject:** RE: Amber Heard [SEC=UNOFFICIAL]

Hi s. 47F(1),

Thank you for your enquiry.

The following lines can be attributed to a departmental spokesperson:

- The Department of Agriculture, Water and the Environment is investigating allegations of perjury by Ms Heard during court proceedings for the 2015 illegal importation of two dogs into Australia.
- As the matter is ongoing, the department cannot make any further comment.

Best,

s.22(1)(a)(ii)

**Media**

Department of Agriculture, Fisheries and Forestry  
02 6272 3232

---

**From:** s. 47F(1)  
**Sent:** Thursday, 30 June 2022 11:04 PM  
**To:** Ag Media <Media@agriculture.gov.au>; media@environment.gov.au  
**Subject:** Amber Heard [SEC=UNOFFICIAL]

Hello - This is s. 47F(1) with the Law&Crime Network. I have seen some rumblings that news may be coming on the Amber Heard perjury investigation. Can you confirm? Are these just rumors?

Thank you,

s. 47F(1)  
Law&Crime Network

s.22(1)(a)(ii)

---

**From:** Ag Media  
**Sent:** Friday, 1 July 2022 11:21 AM  
**To:** s. 47F(1); Ag Media  
**Cc:** s. 47F(1) ; s. 47F(1)  
**Subject:** RE: DAWE media comment / Metro.co.uk [SEC=UNOFFICIAL]

Hi <sup>s. 47F(1)</sup> and colleagues,

Thank you for your enquiry.

The following lines can be attributed to a departmental spokesperson:

- The Department of Agriculture, Water and the Environment is investigating allegations of perjury by Ms Heard during court proceedings for the 2015 illegal importation of two dogs into Australia.
- As the matter is ongoing, the department cannot make any further comment.

Best,

<sup>s.22(1)(a)(ii)</sup>

#### Media

Department of Agriculture, Fisheries and Forestry  
02 6272 3232

---

**From:** s. 47F(1)  
**Sent:** Friday, 1 July 2022 2:12 AM  
**To:** Ag Media <Media@agriculture.gov.au>  
**Cc:** s. 47F(1) ; s. 47F(1)  
**Subject:** RE: DAWE media comment / Metro.co.uk [SEC=UNOFFICIAL]

Hi there,

Just getting in touch to loop in my two colleagues, s. 47F(1) and <sup>s. 47F(1)</sup>, as I'll be off desk here in London. If you're able to keep them in the loop with any updated statement and comment, that would be great.

Thanks,  
<sup>s. 47F(1)</sup>

---

**From:** s. 47F(1)  
**Sent:** 30 June 2022 11:54  
**To:** [media@agriculture.gov.au](mailto:media@agriculture.gov.au)  
**Subject:** DAWE media comment / Metro.co.uk

Hi there,

Am sure you're getting a lot of these emails, so apologies for adding to the pile, but I'm after comment or the latest statement in regards to reports of ongoing investigations into Amber Heard, for perjury, following court proceedings after her visit to Australia in 2015.

Many thanks,  
<sup>s. 47F(1)</sup>

s. 47F(1)  
s. 47F(1)  
p: s. 47F(1)  
tw: s. 47F(1)  
inst: s. 47F(1)

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**From:** Ag Media  
**Sent:** Monday, 4 July 2022 9:33 AM  
**To:** s. 47F(1)  
**Cc:** Ag Media  
**Subject:** FW: [Bulk Mail/Newsletter] Amber Heard perjury follow-up [SEC=UNOFFICIAL]

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Good morning,

Please find below a response to your enquiry, which can be attributed to a departmental spokesperson if required:

- The Department of Agriculture, Water and the Environment is investigating allegations of perjury by Ms Heard during court proceedings for the 2015 illegal importation of two dogs into Australia.
- As the matter is ongoing, the department cannot make any further comment.

Please direct all media enquiries to the Department of Agriculture, Fisheries and Forestry media team in the future.

Kind regards,

s.22(1)(a)(ii)

#### Media

Department of Agriculture, Fisheries and Forestry  
02 6272 3232

[agriculture.gov.au](http://agriculture.gov.au)

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.....  
**Note to media:** Unless otherwise agreed, the information contained in this email is for background and is not for attribution.

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**From:** s. 47F(1)  
**Sent:** Friday, July 1, 2022 11:46 pm  
**To:** Lane, Peta <[Peta.Lane@agriculture.gov.au](mailto:Peta.Lane@agriculture.gov.au)>  
**Subject:** [Bulk Mail/Newsletter] Amber Heard perjury follow-up [SEC=UNOFFICIAL]

Hi Ms Lane,

I'm an s. 47F(1) following up on the Department's investigation of perjury allegations against American actress Amber Heard, as [confirmed](#) in the Senate in October 2020.

Has there been any resolution to whether Ms Heard will be charged? Or has the investigation been closed with no charge?

I'd appreciate any update you can provide, or if there is a better contact in the first instance to reach out to.

Many thanks,  
s. 47F(1)

s. 47F(1)

--

s. 47F(1)

s. 47F(1)

E s. 47F(1)

W NewsCorpAustralia.com

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s.22(1)(a)(ii)

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**From:** Ag Media  
**Sent:** Wednesday, 5 October 2022 8:47 AM  
**To:** s. 47F(1)  
**Cc:** Ag Media  
**Subject:** RE: Perjury investigation [SEC=UNOFFICIAL]

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Good morning s. 47F(1),

Thank you for your enquiry. Please find below a response which can be attributed to a departmental spokesperson if required.

- As the matter is ongoing, the department cannot make any further comment.

Kind regards,  
s.22(1)(a)(ii)

#### Media

Department of Agriculture, Fisheries and Forestry  
02 6272 3232

[agriculture.gov.au](http://agriculture.gov.au)

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.....  
**Note to media:** Unless otherwise agreed, the information contained in this email is for background and is not for attribution.

---

**From:** s. 47F(1)  
**Sent:** Wednesday, 5 October 2022 1:56 AM  
**To:** Ag Media <Media@agriculture.gov.au>  
**Subject:** Re: Perjury investigation [SEC=UNOFFICIAL]

Hello s.22(1)(a)(ii)!

Thank you for your response.

I have one final question. Is Mr Johnny Depp under investigation as well or only Miss Heard?

// s. 47F(1)

---

**From:** Ag Media <[Media@agriculture.gov.au](mailto:Media@agriculture.gov.au)>  
**Sent:** Tuesday, October 4, 2022 05:02  
**To:** s. 47F(1) ; Ag Media <[Media@agriculture.gov.au](mailto:Media@agriculture.gov.au)>  
**Subject:** RE: Perjury investigation [SEC=UNOFFICIAL]

Good afternoon s. 47F(1),

Thank you for your enquiry. Please find below a response which can be attributed to a departmental spokesperson if required.

- The Department of Agriculture, Fisheries and Forestry is investigating allegations of perjury by Ms Heard during court proceedings for the 2015 illegal importation of two dogs into Australia.
- As the matter is ongoing, the department cannot make any further comment.

Kind regards,

s.22(1)(a)(ii)

## Media

Department of Agriculture, Fisheries and Forestry  
02 6272 3232

[agriculture.gov.au](http://agriculture.gov.au)

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.....  
**Note to media:** Unless otherwise agreed, the information contained in this email is for background and is not for attribution.

---

**From:** s. 47F(1)

**Sent:** Monday, 3 October 2022 5:34 PM

**To:** Ag Media <[Media@agriculture.gov.au](mailto:Media@agriculture.gov.au)>

**Subject:** Perjury investigation [SEC=UNOFFICIAL]

Hello!

My apologies for potential disturbance in your work.

My name is s. 47F(1) , s. 47F(1)

I am enquiring about the perjury investigation that your department is undergoing surrounding Miss Amber Heard may submitted a false report while smuggling the her two dogs as well as potential Perjury charges. I emailed Miss Heard's PR team at Shane Communications and one s. 47F(1) from the agency responded and i attached a photo.

Does the Department of Agriculture have any comment to the investigation so far and if it's still active case?

With kind Regards

s. 47F(1)

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s.22(1)(a)(ii)

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**From:** Ag Media  
**Sent:** Monday, 4 July 2022 9:30 AM  
**To:** s. 47F(1) ; Ag Media  
**Cc:** media@environment.gov.au  
**Subject:** RE: Amber Heard [SEC=UNOFFICIAL]

Good morning s. 47F(1),

As the matter is ongoing, the department cannot make any further comment.

Kind regards,

s.22(1)(a)(ii)

#### Media

Department of Agriculture, Fisheries and Forestry  
02 6272 3232

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.....  
**Note to media:** Unless otherwise agreed, the information contained in this email is for background and is not for attribution.

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**From:** s. 47F(1)  
**Sent:** Sunday, 3 July 2022 10:31 AM  
**To:** Ag Media <Media@agriculture.gov.au>  
**Cc:** media@environment.gov.au  
**Subject:** Re: Amber Heard [SEC=UNOFFICIAL]

Hello - I have a follow-up question to my prior email. I understand that your agencies are investigating Amber Heard for perjury. Is it true that the FBI is assisting the Australian government with the investigation? If so, in what capacity?

Thank you,

s. 47F(1)  
Law&Crime Network  
s. 47F(1)

On Thu, Jun 30, 2022 at 9:23 PM Ag Media <[Media@agriculture.gov.au](mailto:Media@agriculture.gov.au)> wrote:

Hi s. 47F(1),

Thank you for your enquiry.

The following lines can be attributed to a departmental spokesperson:

- The Department of Agriculture, Water and the Environment is investigating allegations of perjury by Ms Heard during court proceedings for the 2015 illegal importation of two dogs into Australia.
- As the matter is ongoing, the department cannot make any further comment.

Best,

s.22(1)(a)(ii)

## Media

Department of Agriculture, Fisheries and Forestry

02 6272 3232

---

**From:** s. 47F(1)  
**Sent:** Thursday, 30 June 2022 11:04 PM  
**To:** Ag Media <[Media@agriculture.gov.au](mailto:Media@agriculture.gov.au)>; [media@environment.gov.au](mailto:media@environment.gov.au)  
**Subject:** Amber Heard [SEC=UNOFFICIAL]

Hello - This is s. 47F(1) with the Law&Crime Network. I have seen some rumblings that news may be coming on the Amber Heard perjury investigation. Can you confirm? Are these just rumors?

Thank you,

s. 47F(1)

Law&Crime Network

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s.22(1)(a)(ii)

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**From:** Ag Media  
**Sent:** Wednesday, 6 July 2022 9:13 AM  
**To:** s. 47F(1)  
**Cc:** Ag Media  
**Subject:** RE: The Independent - Amber Heard [SEC=UNOFFICIAL]

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Hello s. 47F(1)

The response below is attributable to the Australian Department of Agriculture, Fisheries and Forestry.

- *The Department of Agriculture, Fisheries and Forestry is investigating allegations of perjury by Ms Heard during court proceedings for the 2015 illegal importation of two dogs into Australia.*
- *As the matter is ongoing, the department cannot make any further comment.*

Kind regards

s.22(1)(a)(ii)

#### Media

Department of Agriculture, Fisheries and Forestry  
02 6272 3232

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**From:** s. 47F(1)  
**Sent:** Wednesday, 6 July 2022 12:23 AM  
**To:** Ag Media <Media@agriculture.gov.au>  
**Subject:** The Independent - Amber Heard [SEC=UNOFFICIAL]

Hello,

My name is s. 47F(1) and I'm a journalist at The Independent, based in New York.

I read a report by Law & Crime that the Department of Agriculture, Water and the Environment is investigating allegations of perjury by Amber Heard during court proceedings for the 2015 illegal importation of two dogs into Australia. Law & Crime allege that the department is receiving the FBI's help in the investigation.

Are you able to confirm whether this investigation is ongoing, and whether the department is receiving the FBI's help?

Could you please keep me included in any media updates or press releases you might send on the matter?

Thank you very much.

Best regards,

s. 47F(1)

s. 47F(1)

s. 47F(1)

– New York City office

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s.22(1)(a)(ii)

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**From:** Ag Media  
**Sent:** Wednesday, 6 July 2022 9:13 AM  
**To:** s. 47F(1)  
**Cc:** Ag Media  
**Subject:** RE: Amber Heard - Daily Mail Australia [SEC=UNOFFICIAL]

Hello s. 47F(1)

The response below is attributable to the Department of Agriculture, Fisheries and Forestry.

- *The Department of Agriculture, Fisheries and Forestry is investigating allegations of perjury by Ms Heard during court proceedings for the 2015 illegal importation of two dogs into Australia.*
- *As the matter is ongoing, the department cannot make any further comment.*

Kind regards

s.22(1)(a)(ii)

#### Media

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**From:** s. 47F(1)  
**Sent:** Wednesday, 6 July 2022 8:51 AM  
**To:** Ag Media <Media@agriculture.gov.au>  
**Subject:** Amber Heard - Daily Mail Australia [SEC=UNOFFICIAL]

Hi there,

Thanks for speaking with me just now.

A retired FBI Special Agent has been quoted as saying Australian authorities will likely be liaising with their American counterparts – namely the FBI – in the investigation into allegations Amber Heard committed perjury Australia.

Can you confirm if your department has sought any assistance or information from the FBI or any other foreign agency? Also, can you confirm the main witnesses in the case live overseas, as has been reported?

<https://lawandcrime.com/live-trials/johnny-depp/fbi-assists-with-australian-probe-into-allegations-of-perjury-involving-amber-heard/>

Many thanks,

s. 47F

s. 47F(1)  
s. 47F(1)