## VIRGINIA:

## IN THE CIRCUIT COURT OF FAIRFAX COUNTY

John C. Depp, II,	)
Plaintiff, v.	Civil Action No.: CL-2019-0002911
Amber Laura Heard,	}
Defendant.	

## **DECLARATION OF JENNIFER HOWELL**

I, Jennifer Howell, declare as follows:

- I am over the age of 18 and not a party to this action. I have firsthand, personal knowledge of the facts set forth below and if called as a witness could competently testify thereto.
- Whitney Henriquez, whose maiden name was Whitney Heard, is my dear friend.
  She has told me that I am her "chosen sister." I also call her my "chosen sister".
- 3. Whitney worked for me at a non-profit organization that I founded 22 years ago and run called The Art of Elysium. We take artists and help them be of service to communities in need. We serve over 30,000 individuals in need each year. Whitney volunteered for the organization in 2014 for about 6 months. And she worked full time as a paid employee for me in 2015-2016, where Whitney served as Art Salon Manager/Director.
- 4. I have learned that Whitney testified in court July 23 in London about a violent incident in March 2015 on the stairs at Johnny Depp's penthouse. She testified that Johnny supposedly hit Amber and Whitney on the stairs at Johnny's downtown penthouse. Then Whitney said she had to go to live with her employer where she had to sleep on their floor. I am that employer. This is not what I was told to be true. First, Whitney came to live in the guest room of

my apartment on Wilshire Boulevard, not on my floor but in my guest room. Second, when Whitney arrived, she was a mess. Whitney told me she tried to stop her sister Amber from hitting anad attacking Johnny on the stairs. Whitney said when she tried to intervene to stop Amber from going after Johnny, Amber nearly pushed Whitney down the stairs. She told me she was worried Amber "was going to kill Johnny." She told me she had endured that kind of abuse her entire life, first from her father, and then from Amber, who she said was extremely violent. She lived with me because she did not feel she could go back to live at the Eastern Columbia Building. My father reminded me this morning that I told him that "Whitney had moved in with me because she was terrified of her sister."

- 5. While Whitney was living with me, she told me Johnny kept checking in to see how she was doing and that he called her "sis" and she called him "brother." Whitney said to me on multiple occasions that she did not know why he was staying in the relationship nor why he was putting up with Amber's abuse. Whitney shared with me the damage endured by both her and Amber as children and the injuries she had suffered from Amber both psychologically and physically. Whitney was devastated during this time, and my heart broke for her.
- 6. When Whitney came back from New York (I believe it was for Tribeca Film Festival, THE ADDERALL DIARIES premiere or both) she shared with me and everyone in the office that Amber freaked out, attacked Whitney and threw a wine glass full of red wine at her in the elevator.
- 7. While Amber and Johnny were in Australia, Whitney was in the office sitting in the black and white chairs near the kitchen and loudly proclaimed, "oh my God, she has done it now. She has cut off his fucking finger."

- was visiting Whitney that Elon Musk had gifted a Tesla or multiple Teslas (not sure if it was one or more), but Amber found out that they were "bugged." Paige told me that Amber said Elon was controlling, abusive and that she was in a legal battle with him over the rights to embryos that they had created together. He wanted to destroy them, and Amber tried to keep them to have a baby. Paige told me that Johnny was either an "angel" or a "saint" compared to Elon, and she wished that Amber and Johnny would reconcile. Paige also told me the reason Johnny and Amber broke up was because Amber was violent and emotional and loved Johnny so much that she could not control it. I was indeed taken aback because this conversation occurred after the divorce and when Hunter was only a few months old, and I was at Whitney's house. Whitney told me that Amber and Johnny were still in touch and that they were each other's true loves or something to that exact sentiment. Whitney was still going through the emotions of having had a baby and all of those ups and downs, and I could not believe that Amber and Johnny's relationship was being discussed while Whitney was the one who needed to be the focal point and needed our support.
  - 9. When Amber got into legal trouble regarding smuggling the dogs into Australia, she asked me to write her a character reference about her charity work, and I did so. We had given her a humanitarian award. She volunteered with the charity and attended events for the charity. I am still grateful for that. I knew nothing about her personal life behind closed door until I became close with Whitney.
  - 10. When Amber was in trouble with the Australian authorities, she asked me to write a character letter in support of her, which I did. I wrote on behalf of Amber for her volunteering with the charity.

- supposed to go to charity. I learned that none of it would be directed to The Art of Elysium, which Amber had been closely associated with for years. Instead, I understood it would all go to ACLU and LA Children's Hospital. I asked Amber's publicist why, when she and Amber had been so eager to use our name in the press during the divorce, and when the funds would mean so much to a small organization like ours, would Amber direct all the money to these other two huge charities that she had not been associated with? Amber's publicist told me that they were more prominent charities with a more significant press reach and got international press. Then, months later, a \$250,000 donation came into our organization from an anonymous donor "on behalf of Amber Heard." The funds did not come from Amber. I believed this donation came from Elon.
  - 12. Years later, on July 24, 2020, I received two subpoenas from Johnny's attorney after Whitney testified about sleeping on my floor following the stairs incident. The following day, I spoke with Johnny's attorney Adam Waldman for the first time.
  - 13. I told him the stories of my experiences with Whitney, Paige and Amber Heard, and he asked me to give this declaration. I shared the names of The Art of Elysium's staff who worked during the same time as Whitney who also heard these things and more and willingly gave access to my e-mails, texts to confirm dates and timeline of all stated.

Executed this 26th day of July, 2020, in Los Angeles, California.

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

Jennifer Howell