

On behalf of: Claimant  
Witness: Sean Bett  
No: First  
Exhibit: SB1  
Date: 12 December 2019

**IN THE HIGH COURT OF JUSTICE  
QUEENS BENCH DIVISION  
MEDIA AND COMMUNICATIONS LIST**

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

**JOHN CHRISTOPHER DEPP II**

**Claimant**

**-and-**

**NEWS GROUP NEWSPAPERS LTD  
DAN WOOTTON**

**Defendant**

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**FIRST WITNESS STATEMENT OF  
SEAN BETT**

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I, **SEAN BETT**, of Los Angeles, United States of America, **WILL SAY** as follows:

1. I worked as a deputy with the Los Angeles County Sheriff's Department from 1999 to 2004. Following that, I have been working in private security for the past 16 years. For the past 9 years I have been working exclusively with the Claimant, Mr John Christopher Depp II, and his family.
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. There is now produced to me and marked "**Exhibit SB1**" a paginated bundle of true copy documents referred to in this witness statement. References to page numbers are references to Exhibit SB1, unless otherwise stated.
4. I make this witness statement in support of the Claimant's claim in these proceedings.

5. I do not know the details about these proceedings, but I understand from the Claimant's solicitors that these proceedings relate to the allegations that Mr Depp was verbally and physically abusive to his former wife, Ms Amber Heard, throughout their relationship. I was with Mr Depp and Ms Heard very regularly throughout this period and I never saw any cuts, bruises or other injuries on Ms Heard. I also never saw Mr Depp commit any act of physical violence to another person. Indeed, when they were in Los Angeles, I would have been with Mr Depp and Ms Heard between 5 and 7 days a week, so had Ms Heard sustained any injuries during that time, I would have seen them. I saw no such injuries.
6. On the contrary, throughout the course of Mr Depp and Ms Heard's relationship, Ms Heard was verbally and physically abusive towards Mr Depp. On many occasions, I witnessed her shout at Mr Depp. I was also told by Mr Depp on multiple occasions that Ms Heard had physically abused him. A very common occurrence throughout the relationship would be that Mr Depp would have me, and other members of his security team, take him away from Ms Heard, due to her behavior. He would then stay somewhere else. This happened on so many occasions that it is not possible for me to remember them all in detail. However, I would describe it as a recurring cycle that Ms Heard would abuse Mr Depp, who would then remove himself from the situation.
7. Ms Heard often behaved in this way when she had been drinking. I learnt quickly to recognize the signs, so that we were able to leave the situation before it escalated further. I also knew that she could be violent towards Mr Depp, so it was important that he did not remain in a situation with Ms Heard when she was in this kind of abusive mood.

**April 21<sup>st</sup>, 2016**

8. On April 21<sup>st</sup>, 2016, I remember driving Mr Depp to a party for Ms Heard's birthday. He had been at a business meeting and was running late for the party. Later on in the evening, I was called by Mr Depp and I then drove him home to another one of his properties. He had told me that Ms Heard had sought to argue with him and had punched him causing him to sustain visible injury. I took a picture of his injury and it is at page 1 of Exhibit SB1.
9. The following day, I received from Mr Kevin Murphy, Mr Depp's then estate manager, photos of human feces in Mr Depp and Ms Heard's bed. I believe that this was as a result of the actions of Ms Heard.

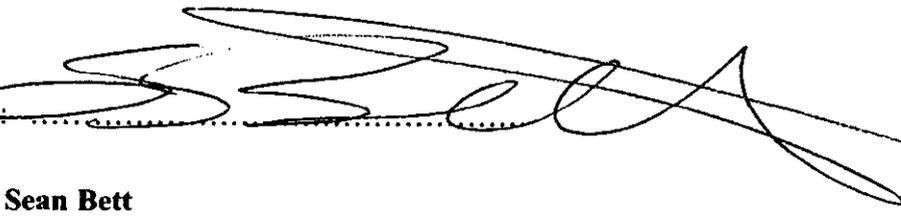
May 21<sup>st</sup>, 2016

10. I have been told by the Claimant's solicitors that, amongst other things, the Defendants specifically allege that Mr Depp abused Ms Heard on May 21<sup>st</sup>, 2016. I set out my recollection of that day below.
11. I was working on the evening of May 21<sup>st</sup>, 2016. Mr Depp, my former partner, Mr Jerry Judge, and I arrived at 849 S. Broadway, Los Angeles between 19:30 and 19:45. Mr Depp owned adjoining penthouses 3, 4 and 5. That night Mr Depp was sober, lucid and had expressed his concern to us about how Ms Heard might behave. We entered Penthouse 3 where Mr Depp and Ms Heard primarily resided. There were lit candles and there was an open bottle of wine with at least one glass on the counter. Mr Depp told us that he would go upstairs to the bedroom to speak to Ms Heard. I do not think that anyone else was in the apartment at this stage. While he did so, Mr Judge and I went to the hallway. We went very briefly into Penthouse 4 and then returned to outside the door of Penthouse 3. One can see into the Penthouse and hear what is happening inside from there.
12. After approximately 10 minutes, Mr Judge and I heard Ms Heard's shouts. I could not make out what she was saying, but we immediately entered the penthouse. I have been told by Mr Depp's solicitors that the Defendants allege that Ms Heard tried to telephone one of Mr Depp's "*trusted employees*". She did not call me or Mr Judge and the only reason why we entered the Penthouse 3 was because we had heard these screams.
13. When we entered, we saw Mr Depp standing approximately 20 feet away from Ms Heard, who was standing by the couch. As soon as Ms Heard noticed that we had entered the room, she looked very surprised; her demeanor then changed and she pointed at Mr Depp and screamed to us words to the effect of: "*If he hits me one more time, I am calling the police.*" I believe that Raquel Pennington was the Penthouse 3 at this stage.
14. I understand from Mr Depp's advisor that Ms Pennington and Ms Heard have both testified that Ms Heard summoned Ms Pennington by text around 8:06 PM that night, and that Ms Pennington rushed down the hallway from Penthouse 5 to Penthouse 3 to assist. I also understand that Josh Drew claimed that Mr Judge and I were waiting in Penthouse 5 rather than in front of Penthouse 3, and saw us through the peephole running towards Penthouse 3 when the yelling started. Both of those statements are falsehoods for the same reason: other than our brief entry into Penthouse 4, Mr Judge and I were guarding the door to Penthouse 3 for the entirety of the incident to protect

Mr Depp in case Ms Heard pulled something. So Ms Pennington did not come through us into the only entrance into Penthouse 3; she was clearly already inside Penthouse 3 when we arrived. And her ex-husband's testimony that he saw us running through the peephole is just a lie to explain the impossible.

15. I have quite good eyesight. I was able to see that Ms Heard was wearing little or no make-up, her skin was quite pale and she had no red marks or evidence of any bruises or abrasions to her face or body. I could see Mr Depp was visibly upset at having been accused of hitting Ms Heard. However, he never came closer than 20 feet to her during the time I was able to observe them. I did not notice any smashed glass or broken bottles in the apartment at the time.
16. Mr Depp, Mr Judge and I agreed that it would be best if Mr Depp left the building, due to the fact that the situation had escalated and Ms Heard was hysterically shouting at Mr Depp and making allegations about his behavior. We did so, but once we were in the car we realised that Mr Depp had left his mobile phone in Penthouse 3. As a result, Mr Judge called Mr Drew who lived with his fiancée, Ms Pennington, in one of Mr Depp's penthouses. Mr Drew brought the phone downstairs within 5 – 10 minutes and handed it to Mr Judge.
17. I have never seen Mr Depp being violent to anyone including Ms Heard during the long period I have been working for him. In addition, I have observed Ms Heard throwing bottles, glasses and other objects at Mr Depp while being verbally abusive towards him. As a rule, during these episodes Mr Depp remains fairly passive and either tries to calm Ms Heard down or remove himself from the situation.

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

Signed:  .....

**Sean Bett**

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**BETWEEN:**

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**- and -**

**(1) NEWS GROUP NEWSPAPERS LTD**

**(2) DAN WOOTTON**

**Defendant**

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**FIRST WITNESS STATEMENT OF  
SEAN BETT**

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