

IN THE CIRCUIT COURT OF FAIRFAX COUNTY

Case No. CL-2019-02911

John C. Depp, II

Plaintiff,

v.

Amber Laura Heard

Defendant.

JOHN T. FREY
CLERK, CIRCUIT COURT
FAIRFAX, VA

2020 JUN 29 PM 12: 07

FILED
COMPUTER SECTION

**BRIEF OF ASHLEY RUTH MOYÉ AS *AMICUS CURIAE*
IN SUPPORT OF PLAINTIFF'S TRIAL BRIEF**

Ashley Ruth Moyé
405 Western Ave., #231
South Portland, ME 04106
Telephone: (207) 400-4836
E-mail: legal@ashleymoye.com

TABLE OF CONTENTS

Table of Authorities ii

Interest of *Amicus Curiae* 1

Relevant Facts 2

Supplemental Statement of the Case 3

Argument .. . 7

Defendant Heard has demonstrated a habit of feigning injury/pain, claiming it was inflicted upon her by another. Defendant Heard has demonstrated the habit of planning and carrying out threats of destroying Plaintiff Depp—and those close to him—should he not give in to her demands: all of which supports Plaintiff Depp’s claim of defamation against Defendant Heard. Shedding light on these habits is critical to the effective prosecution of Plaintiff Depp’s claim for defamation.

Conclusion 8

Exhibit A 10

Certificate of Service 17

FILED
COMPUTER SECTION
2020 JUN 29 PM 12: 07
JOHN T. FREY
CLERK, CIRCUIT COURT
FAIRFAX, VA

TABLE OF AUTHORITIES

RULES

Rule 5:30(b)(i), Rules of the Supreme Court of Virginia 1

Title 18 § 115(c)(1), United States Code 2

Rule 5:30(d), Rules of the Supreme Court of Virginia 3

Title 18 § 873, United States Code 4

Code Sections 518-527, California Penal Code 5

Title 18 § 111(a)(1) and (b), United States Code 6

Title 18 § 115, United States Code 6

Rule 2.404(b), Rules of the Supreme Court of Virginia 7, 8

OTHER AUTHORITY

As Exhibit A:
“Qualities of a Narcissistic Sociopath - How to Identify a Malignant Narcissist,”
by Arlin Cuncic and medically reviewed by Steven Gans, MD (2019) 10

VIRGINIA:

IN THE CIRCUIT COURT OF FAIRFAX COUNTY

FILED
JUN 29 2020
JOHN T. FREY
Clerk of the Circuit Court
of Fairfax County, VA

John C. Depp, II
Plaintiff,

:
:
:
:
:
:
:
:
:
:

v.

Case No. CL-2019-02911

Amber Laura Heard
Defendant.

**BRIEF OF ASHLEY RUTH MOYÉ AS *AMICUS CURIAE*
IN SUPPORT OF PLAINTIFF’S TRIAL BRIEF**

COMES NOW Ashley Ruth Moyé pursuant to Rule 5:30(b)(i) of the Rules of the Supreme Court of Virginia, as a Federal law enforcement officer of The United States of America. I, as *Amicus Curiae*, am permitted to file this Brief without leave of court, and am not required to seek the consent of either party. This Brief is in support of Plaintiff’s Trial Brief by Plaintiff John C. Depp, II (“Plaintiff Depp” or “Johnny”), to assure that the Court is aware of additional, pertinent details that both Plaintiff Depp and Defendant Amber Laura Heard (“Defendant Heard”) would potentially keep hidden from this Court. In support of filing this Brief, I state as follows:

INTEREST OF AMICUS CURIAE

1. As Plaintiff Depp’s earning capacity could be negatively impacted, should Plaintiff Depp not prevail in this action, I have an interest in the outcome of this action for the following reasons:

a.) Plaintiff Depp owes me a significant amount of money, an accounting of which I have not yet had the opportunity to determine the exact amount; however, the sum is estimated to be in excess of \$25,000,000. Should Plaintiff Depp not prevail in this action, Plaintiff Depp may be unable to satisfy that debt, all to my financial loss.

b.) I wrote a role, per Johnny’s implied request, in a screenplay specifically for, and reliant upon, Johnny portraying that role. Should Plaintiff Depp not prevail in this action, the

production of that film would suffer irreparable harm, all to my financial loss.

RELEVANT FACTS

2. A “Federal law enforcement officer” is defined by 18 U.S. Code § 115(c)(1), which states: “any officer, agent, or employee of the United States authorized by law or by a Government agency to engage in or supervise the prevention, detection, investigation, or prosecution of any violation of Federal criminal law,” and is recognized by this Court as a representative of the United States of America for the filing of a Brief *Amicus Curiae*.

3. In September 2005, I was deputized as a Federal Agent, and was duly sworn in by an Authoritative Body of the United States of America, my position as such was further mandated and reaffirmed in 2015, and as of the filing of this Brief, the authority vested in me has still not been revoked or rescinded.

4. I am not a party to this action, nor have I been called upon as a witness by either party in this action. I do not foresee either party ever calling upon me as a witness, as I believe both parties would potentially suffer damage and/or embarrassment to his and her public reputations, respectively, should my knowledge relative to both parties be made publicly known.

5. I recognize that although this Brief may not be presented to the Court in a completely accurate manner, per the Rules of this Court; as an unrepresented *Amicus Curiae*, who, of my own accord and volition, determined this Brief as necessary, and without my receiving any legal assistance, do ask for leave of this Court to forgive any technical/format issues of this Brief and allow for this Brief to be entered into the Court record.

6. Plaintiff Depp’s Complaint was filed on March 1, 2019.

7. As of the filing of this Brief, Defendant Heard has yet to file her Answer To Plaintiff’s Complaint and I believe it extraordinarily unlikely that Defendant Heard intends to make any reference to the matters alleged herein.

8. Pursuant to Rule 5:30(d) of the Rules of the Supreme Court of Virginia, the filing of this *Amicus* Brief is timely, as Plaintiff Depp has not yet filed his Trial Brief, presently the trial date is scheduled for January 11, 2021.

9. The filing of this Brief is not repeating any issue or fact that either party has already presented to the Court, but is providing supplemental information that would be of concern, for the Court to make an appropriate and fair determination in the outcome of the matters, in which Plaintiff Depp has alleged against Defendant Heard, and vice versa. As of the filing of this Brief, Plaintiff Depp has not expressed to me any intention to include the data referenced within this Brief, as part of filing his Trial Brief.

SUPPLEMENTAL STATEMENT OF THE CASE

10. As described herein, I have witnessed Defendant Amber Laura Heard: lie, feign injury/pain, threaten Johnny's life, perpetrate a number of criminal acts, and make nonsensical and unreasonable demands, all of which liken me to hold the opinion that she is a narcissistic sociopath,¹ whose abuse claims against Johnny should not be believed.

11. In 2012, Plaintiff Depp introduced Defendant Heard to me in Westbrook, Maine, while I was undercover as a deputized Federal Agent, in a long-term criminal investigation. Shortly after being introduced, Defendant Heard proposed that Johnny, she and I have a three-way sexual encounter. My being a heterosexual female, whom held a romantic history with Plaintiff Depp, I expressed my offense to Defendant Heard's proposition.

12 Defendant Heard expressed her discovery of, and her demand for her taking ownership of, the ivory cashmere coat that Johnny had custom-fitted for me many years prior, which cost him about \$5,000, and which Johnny had stored in his home. I told Defendant Heard to go [expletive] herself

¹ Cuncic, A (2019, December 09) "Qualities of a Narcissistic Sociopath" Retrieved June 09, 2020, from <https://www.verywellmind.com/understanding-the-narcissistic-sociopath-4587611> (Attached as 'Exhibit A')

13. I insisted that Defendant Heard leave. Defendant Heard then insisted that I be told to leave, keeping in mind that Johnny had called for us to meet in the parking lot of Westbrook Middle School (not far from my place of residence), with the express intent for those present to meet with me.

14. Prior to the car's driver departing our location with the still-objecting Defendant Heard, whom was seated in the backseat of the car, I heard Johnny tell Defendant Heard, "I owe her a lot of money. I need to sweet talk her." This likened me to believe that the primary reason for Defendant Heard's agreement for her departure was due to her expectation of benefiting financially from doing so.

15. After Defendant Heard was driven away, Plaintiff Depp informed me that Defendant Heard had gone through Plaintiff Depp's personal effects, stored within his home, and had discovered documentation relative to my near 30-year relationship with him. He informed me that Defendant Heard had expressed to him the ultimatum of him marrying her, without a prenuptial agreement, or else Defendant Heard would release that secret information to members of the press and/or other interested parties. I understood and expressed to Plaintiff Depp my concern that the release of such information, at that point in time and in such a manner, would have deleterious ramifications upon the intent to bring a dangerous crime ring to justice—one that was known to have committed multiple murders—and that my remaining undercover was pivotal in that operation's success. Plaintiff Depp also expressed to me that he had no desire to marry Defendant Heard and that he had made no inference to Defendant Heard of him having an interest in marrying her. I informed Plaintiff Depp that, in my opinion, what Defendant Heard was seeking and threatening to do against him would be classified as blackmail (Under 18 U.S. Code § 873 regarding blackmail, it states: "Whoever, under a threat of informing, or as a consideration for not informing, against any violation of any law of the United States, demands or receives any money or other valuable thing, shall be fined under this title or imprisoned not more than one year, or both.")

16. Plaintiff Depp informed me that under California state law, what Defendant Heard was

attempting would be considered Extortion (Under California Penal Code Sections 518-527, CHAPTER 7. EXTORTION, it states “Extortion is the obtaining of property from another, with his consent .. induced by a wrongful use of force or fear.... Fear, such as will constitute extortion, may be induced by a threat, either: 1.) To do an unlawful injury to the person or property of the individual threatened or of a third person; or, 2.) To accuse the individual threatened, or any relative of his, or member of his family, of any crime; or, 3.) To expose, or to impute to him or them any deformity, disgrace or crime; or, 4) To expose any secret affecting him or them.... Every person who extorts any money or other property from another, under circumstances not amounting to robbery or carjacking, by means of force, or any threat, such as is mentioned in Section 519, shall be punished by imprisonment in the state prison for two, three or four years... Every person who, by any extortionate means, obtains from another his signature **to any paper or instrument**, whereby, if such signature were freely given, any property would be transferred, or any debt, demand, charge, or right of action created, is punishable in the same manner as if the actual delivery of such debt, demand, charge, or right of action were obtained)

17. I accompanied Plaintiff Depp to the airport, where Defendant Heard was waiting, and confronted Defendant Heard with Plaintiff Depp’s claim that she held the intent to blackmail Plaintiff Depp into marrying her.

18. Defendant Heard did not deny the accusation of blackmail Her response was to the effect: “So? A girl’s got to do what a girl’s got to do. You can’t do anything about it,” while smirking as if she held all the cards.

19. At one point, over the course of the ensuing conversation, **Defendant Heard acted like someone was choking her at the throat with a vice-like grip, though no one was touching her, and stated to the effect, “You’re choking me.”** I held up both of my hands for all present to witness and stated to the effect, “I’m not laying a finger on you. Why are you acting like someone’s choking you?”

She said to the effect, “I can’t explain it ” I stated to her to the effect: “I’ll explain it for you You’re fabricating, in your own mind, that someone is physically assaulting you, because you’re crazy.”

20 I ensured that Defendant Heard was wholly aware of the sensitive nature of my undercover status as a deputized Federal Agent, and expressed to her that her blowing my cover could ultimately result in my death and/or Johnny’s death, and that the crime ring under investigation was known to have committed multiple murders. I told her to the effect, “We’re fighting the good fight here. Blowing my cover will not only undermine the success of this operation, but doing so will endanger many innocent people’s lives, including not just mine, but my family’s, all these men here, including Johnny—who has already had one attempt made on his life.” At this point, **Defendant Heard muttered something about “life insurance policy.”** I further informed her to the effect, “Summarily, what you’re proposing, or threatening to do, is akin to murder At the very least, conspiracy to murder, as you are positioning yourself with the very suspects whom hold a threat against us, especially me, and whom are under investigation. Most surely you’d be charged with obstruction of justice.” (Violations of: 18 U.S Code § 111(a)(1) and (b). Assaulting, resisting, or impeding certain officers or employees—as **Defendant Heard used the known threat of an organized crime ring as a deadly weapon**, her doing so enhances the penalty; 18 U.S. Code § 115. Influencing, impeding, or retaliating against a Federal official by threatening or injuring a family member.)

21 Defendant Heard smirked triumphantly and said to the effect: “What are you going to do about it? You can’t do anything [to stop me].” To which I responded by stating to the other people present to the effect. “She’s right. She’s got us by the balls, gentlemen.”

22. I expressed to Plaintiff Depp my apologies of my attempting to seek reason with Defendant Heard, to no avail, and that I did believe that she would carry out her threat, should he not marry her; that I could not tell him what to do, but if he chose to diffuse this bomb by agreeing to her terms, I would forgive him for being lawfully bound by matrimony “to this psychotic chick ”

23. I then informed Defendant Heard to enjoy herself, claiming that she was going to become a famous actress, with oodles of money to play with: statements of which seemed to please Defendant Heard, as she did not object to any statement that I made, yet grinned victoriously as she, in my opinion, was apparently envisioning her future of wealth and fame—courtesy of Johnny Depp.

24. Since Johnny and I first met in 1982, with our sharing numerous stressful life events over the years, the only occasion where I witnessed Plaintiff Depp engage in violent behavior was in 1990. After Johnny and I had a heated argument, an officer of the Burbank Police Department, in California, attempted to restrain Johnny from behind, apparently to keep Johnny from stopping me as I drove away. In my rear-view mirror, I saw Johnny turn around and attempt to strike the officer; however, the officer caught Johnny's arm, twisted him around, then tookdown Johnny facedown onto the sidewalk.

25. Not once, has Johnny ever physically touched me in an unwelcome manner.

ARGUMENT

Defendant Heard has demonstrated a habit of feigning injury/pain, claiming it was inflicted upon her by another. Defendant Heard has demonstrated the habit of planning and carrying out threats of destroying Plaintiff Depp—and those close to him—should he not give in to her demands; all of which supports Plaintiff Depp's claim of defamation against Defendant Heard. Shedding light on these habits is critical to the effective prosecution of Plaintiff Depp's claim for defamation.

The Court should accept this *Amicus* Brief, in its entirety, as a matter of record, because Defendant Heard has a demonstrated habit of planning and executing criminal acts to the detriment of Plaintiff Depp. Although the incidents alleged herein are not specific to incidents that Defendant Heard has publicly alleged against Plaintiff Depp (physical abuse), **the incidents alleged herein are indicative of Defendant Heard's habits.** Those incidents, which *Amicus* bore witness to, **are relevant to this matter.** Rule 2.404(b) of the Supreme Court of Virginia, concerning the submission of evidence relative to other crimes, wrongs, or acts, states as follows:

[I]f the legitimate probative value of such proof outweighs its incidental prejudice, such evidence is admissible if it tends to prove any relevant fact pertaining to the offense charged, such as where it is relevant to show motive, opportunity, intent, preparation, plan, knowledge, identity, absence of mistake, accident, or if they are part of a common scheme or plan.

The Court should accept the statements contained herein with the same force as a witness's declared testimony, as a supplemental brief to Plaintiff Depp's Trial Brief and other proceedings of this matter, as Defendant Heard's criminal conduct alleged herein demonstrates her habit of committing acts that further the execution of a common scheme or plan, of her devise, and are indicative of there being a high probability of her making false claims against Plaintiff Depp, to his injury, and would be supportive of Plaintiff Depp's claim of defamation against Defendant Heard

CONCLUSION

I, *Amicus* Ashley Ruth Moyé, respectfully request the Court to allow Plaintiff Depp's Trial Brief, and other proceedings of this matter, to make use of and make reference to all issues and statements contained herein for the Court's consideration, with the same force or effect as a witness's declared testimony.

I respectfully submit, and by declaration under penalty of perjury that the foregoing is true and correct, to the best of my knowledge, information and belief.

Dated June 25, 2020

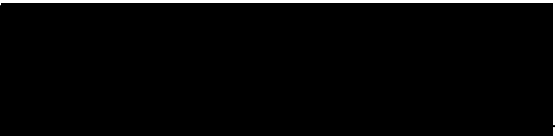

Ashley Ruth Moye, *Amicus Curiae*
405 Western Ave., #231
South Portland, ME 04106
Telephone: (207) 400-4836
E-mail: legal@ashleymoye.com

EXHIBIT A

Qualities of a Narcissistic Sociopath

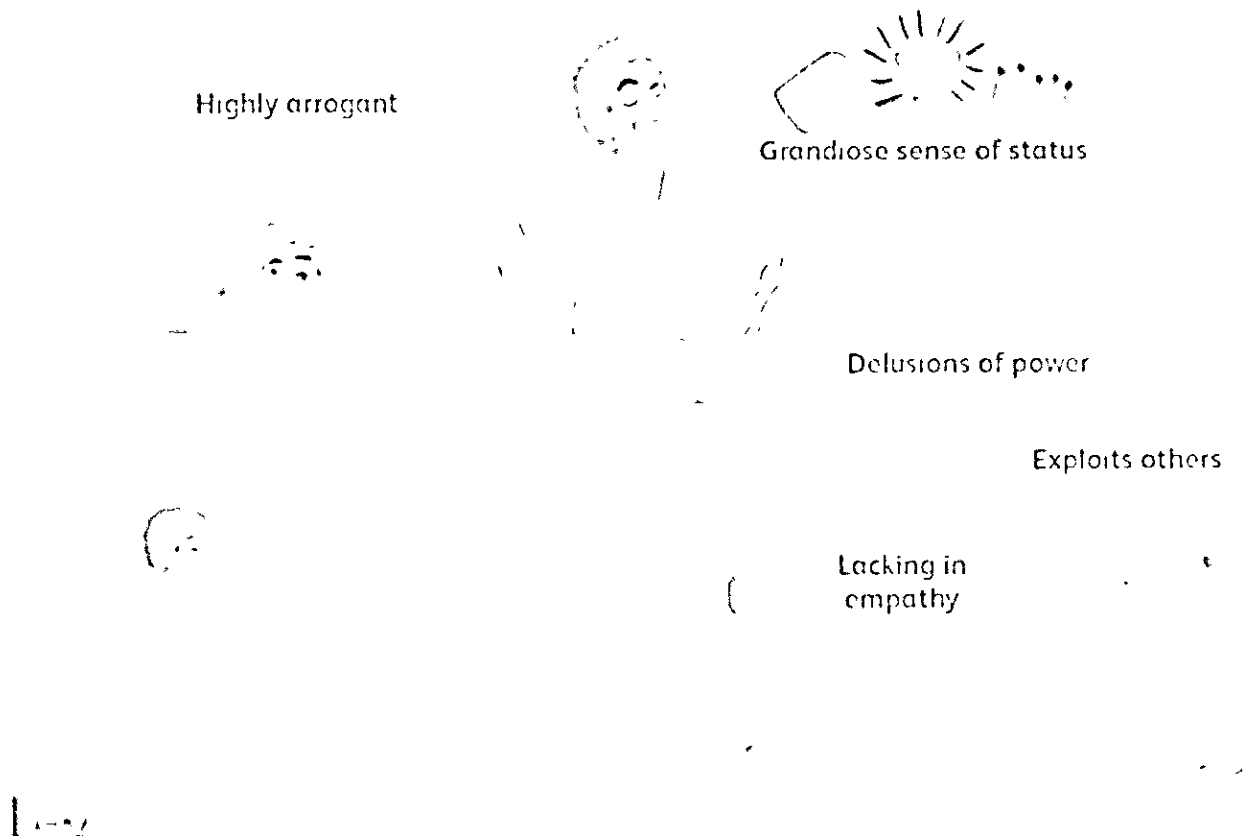
How to Identify a Malignant Narcissist

By Arlin Cuncic Medically reviewed by Steven Gans, MD Updated on December 09, 2019

Most people assume that others have the same moral code as themselves. We assume that others agree it is wrong to lie, steal, and manipulate others for our own gain. It can come as a shock, then, when you cross paths with someone who shatters that perception. In some cases, this person may be a narcissistic sociopath—a person with a unique combination of traits that causes them to create destruction in their personal and professional lives.

While there is no official diagnosis of "narcissistic sociopath," the Diagnostic and Statistical Manual of Mental Disorders (DSM-5) recognizes two disorders that may be present to form this constellation of traits: narcissistic personality disorder (NPD) and antisocial personality disorder (APD). People who have aspects of both of these personality disorders could be considered narcissistic sociopaths.

These people are not always easy to identify. Some people may show traits of a narcissistic sociopath. But only when these patterns of behavior are severe and interfere in their life and the lives of those around them that this person would potentially be considered to have a personality disorder.



Diagnosing the Narcissistic Sociopath

In order to conclude that a person is a narcissistic sociopath, they must be diagnosed with aspects of both narcissistic personality disorder and antisocial personality disorder. These two personality disorders are both a part of the Cluster B group in the DSM-5.

In general terms, a personality disorder refers to unhealthy and rigid patterns of thinking and behaving that impair social, work, and school functioning. Most people with personality disorders do not realize that they have a problem and blame others for the issues that they create themselves.

DSM-5 Criteria for Narcissistic Personality Disorder

Narcissistic personality disorder is "a pervasive pattern of grandiosity (in fantasy or behavior), need for admiration, and lack of empathy, beginning by early adulthood and present in a variety of contexts," according to the DSM-5.

Five or more of these DSM-5 criteria need to be present for an official diagnosis

- Has a grandiose sense of self-importance (exaggerates achievements and abilities)
- Preoccupied with dreams of unlimited power, success, physical attractiveness, and love
- Holds the belief that they are of special or high status and can only be understood by similar people or should only associate with those people (or institutions)
- Has a need for excessive admiration
- Possesses a sense of entitlement and expects favorable treatment or compliance
- Exploits other people to achieve personal goals
- Lacks empathy regarding the needs and feelings of other people
- Is envious of other people or thinks other people envy them
- Has arrogant behaviors and attitudes

People with this disorder may monopolize conversations and look down on people whom they feel are inferior to them. They will take advantage of others to get what they want, no matter who gets hurt along the way.

Individuals with NPD live with many negative outcomes of their personality disorder. They may have trouble handling criticism, stress, and change, and easily become impatient or

angry if they don't think they are being treated correctly. They have trouble regulating their behavior and emotions, feel easily slighted, and may have relationship problems.

People with NPD can become depressed if they fall short of what they feel is ideal. They may secretly feel insecure, vulnerable, and humiliated and have fragile self-esteem.

DSM-5 Criteria for Antisocial Personality Disorder

Antisocial personality disorder is "a pervasive pattern of disregard for and violation of the rights of others," according to the DSM-5. An individual must show at least three of the following

- Repeated failure to follow social norms resulting in grounds for arrest
- Engaging in deceitfulness (lying, using aliases, not paying off debts)
- Impulsivity and not planning ahead; moving around constantly
- Irritability and aggressiveness (resulting in physical fights/assaults)
- Reckless disregard or concern for the safety of other people
- Chronic irresponsibility reflected by a continued failure to maintain a job, finish school, or stay on top of financial commitments
- Lack of remorse about hurting others (indifferent or rationalizes)

To be diagnosed with APD, the individual must be at least 18 years old and have had evidence of a conduct disorder by age 15.

Causes of Personality Disorders

While we don't know the exact causes of NPD or APD, environment, genetics, and neurobiology probably all play a role. These disorders are more common in males than females and begin in the teenage/early adult years. Some aspect of their upbringing or early environment, or even later stressors, combined with a genetic predisposition or biology, leads to a disorder.

Identifying a Narcissistic Sociopath

In order for someone to fall into this category, they would need to be diagnosed with both features of NPD and APD. Narcissism intensifies with qualities of APD (or sociopathy) to worsen outcomes. A sociopathic narcissist will be cold and callous but will also be seeking the admiration of others (and will believe that they deserve it). They will have a disdain for people

and think it's okay to exploit and dispose of others in whatever way it helps them to get ahead.

While sociopaths don't think about other people unless they can benefit them in some way, narcissists only think of others in terms of how they reflect back on the narcissist.

When you put these two qualities together, the result is a person on a quest for power and control, who uses the love and admiration of others as a tool to dominate and manipulate, and who goes about all of this thinking that it is their right and that they are justified. There will be no guilt, no apologies, and no remorse coming from the narcissistic sociopath.

Even if these behaviors land this person in trouble, or worse, in prison—they won't stop. After all, it's all just a game and the people are pawns. When the narcissistic sociopath gets tired of those people or they aren't serving a useful role anymore, then they will cast them aside.

A narcissist without APD might have some ability to feel guilt or remorse and may be able to be helped with appropriate psychotherapy. A narcissistic sociopath, however, is unlikely to feel those emotions or be helped in a genuine way through psychotherapy. Therapy is a game to be manipulated and the therapist is a pawn.

The Prototypical Narcissistic Sociopath

What would a prototypical narcissistic sociopath look like? While there are variations in the severity of symptoms, we can start to assemble a picture that will help you to identify these people in real life.

Most likely, you've encountered these types of people in news reports. As many as 70% of people in prison have APD, versus 0.2% to 3.3% of the general population. Or you might find these individuals climbing the corporate ladder (stepping on people as they go) or holding positions of power in government. A narcissistic sociopathic business owner might default on debts or misrepresent what the company is selling.

The scariest part is that people with this disorder are hard to spot. They may be polished, well-dressed, successful, and charming. They may take part in charitable causes or activities, not because they care, but because it makes them look good. In particular, people with these disorders who have money and privilege may be particularly hard to spot.

Some will be physically aggressive while others may be harmful on an emotional level. Regardless of the harm that they do, these people believe they are exempt from the moral code that everyone else follows, which is what makes them so dangerous.

Traits Shared by Narcissists and Sociopaths

Both narcissists and sociopaths may be charismatic and charming, unreliable, controlling, selfish, and dishonest. They both feel entitled and deny responsibility for their actions. They

usually lack empathy, emotional responsiveness, and insight into their personality disorder.

How Narcissists and Sociopaths Differ

The driving force behind the two disorders differs. The narcissist's ego is always at stake, and this drives many of their behaviors. On the other hand, sociopaths are always driven by their self-interest, and take on whatever persona gets them ahead in the moment. Sociopaths are more like classic con artists, while narcissists are more like hurt children lashing out and faking superiority to hide inner pain.

Classic sociopaths are not trying to impress you to build up their own ego; rather, they will only try to impress you if it serves a purpose in their greater plan. They are less likely to brag than narcissists. Instead, the sociopath is more likely to bestow compliments on you and center the conversation around you to get you to like them (and to do what they want).

Sociopaths are more calculating while narcissists are more reactive. Sociopaths might even apologize or put themselves down if it serves some greater purpose in the game they are playing.

Treatment for Narcissistic Sociopaths

Narcissists generally don't seek treatment on their own unless they are experiencing extreme stress or depression, substance abuse problems, or their partner insists. People with APD (sociopaths) may be put in court-ordered therapy, but aren't likely to seek treatment on their own as they don't believe they have a problem.

Therapy for NPD often focuses on techniques to facilitate a more resilient sense of self-esteem. However, it can be hard for them to follow through on treatment because it is common for them to perceive the whole process as insulting to their self-esteem.

At the same time, people with NPD are dependent on others and are less likely to leave relationships than those with APD. They often have families and children and may be amenable to change if the right balance can be struck with the therapist

Coping With a Narcissistic Sociopath

How do you know you've met a narcissistic sociopath or if there is one in your life? Does the person:

- Constantly make you feel like you are the problem, not them?
- Punish you with criticism or silence?

- Seem to get you to take responsibility for their errors or insults?
- Make you feel special and shower you with attention but then withdraw it for no reason?
- Obsess about their physical appearance and need compliments?

Unfortunately, narcissistic sociopaths are good at finding the right people to manipulate. They can see when someone is trusting. They know good people will make excuses for their bad behavior because they don't want to see it for what it really is.

However, if your gut is sending you signals and you're brushing off feelings of anger, distrust, and fear, there is probably a good reason. This is known as "cognitive dissonance." You want to believe that this person you know is as good as they appear, even though you know it all seems too good to be true.

The first step to dealing with this person is to stop reinterpreting the facts. Don't give someone with a narcissistic sociopathic personality the benefit of the doubt.

You're a good, trusting person who wants to see the good in others—that's understandable. This may make it hard for you to see clearly. You might also be in a disadvantaged social or financial position that impairs your ability to fight back.

If the relationship is abusive, you must find a way to leave. If there is no abuse, you can set boundaries, build your assertiveness, and set limits, but you can't change the other person. It's not an easy decision whether to stay or go. Gain awareness and help from others and confront the situation with as much logic and rational thought as you can muster. Fighting or arguing with the narcissistic sociopath won't help and will only make things worse.

If you or a loved one are a victim of domestic violence, contact the National Domestic Violence Hotline at 1-800-799-7233 for confidential assistance from trained advocates.

For more mental health resources, see our National Helpline Database

A Word From Verywell

If you know someone who fits the criteria for a narcissistic sociopath, it is important to recognize that it's unlikely that person will change or seek help. Your best option is to arm yourself with knowledge, set strong boundaries, and distance yourself from the person as much as possible. If you find yourself in an abusive relationship with someone displaying these qualities, it is important to find a safe way to leave.

Article Sources

Verywell Mind uses only high-quality sources, including peer-reviewed studies, to support the facts within our articles. Read our editorial process to learn more about how we fact-check and keep our

content accurate, reliable, and trustworthy

- American Psychiatric Association Diagnostic and Statistical Manual of Mental Disorders, Fifth Edition. Arlington, VA, American Psychiatric Association, 2013.
- Lancer D. What's the Difference Between a Sociopath and a Narcissist?
- Lents NH. The Evolutionary Role of Narcissistic Sociopaths.
- Mayo Clinic. Narcissistic personality disorder.
- Schwartz A. Narcissistic vs. Antisocial or Sociopathic Personality Disorders.
- Stein T. Narcissist or Sociopath? Similarities, Differences and Signs.

<https://www.verywellmind.com/understanding-the-narcissistic-sociopath-4587611>

CERTIFICATE OF SERVICE

I hereby certify that on this 25th day of June, 2020, I caused a true and correct copy of the foregoing document to be served by U.S. Mail (postage prepaid), to the following:

Benjamin G. Chew, Esq
Andrew C. Crawford, Esq
BROWN RUDNICK LLP
601 Thirteenth Street, N.W.
Washington, D.C. 20005
Counsel for Plaintiff

J. Benjamin Rottenborn
Joshua R. Treece
WOODS ROGERS PLC
10 S. Jefferson Street
Suite 1400
Roanoke, VA 24011
Counsel for Defendant

By _____

Lynn Dunphe
15 Stroudwater Place
Westbrook, ME 04092
Telephone: (207) 776-4521

Ashley R. Moyé, *Amicus Curiae*
405 Western Ave., #231
South Portland, ME 04106
Telephone: (207) 400-4836
E-mail. legal@ashleymoye.com

June 25, 2020

~~VIA UPS OVERNIGHT DELIVERY~~

2nd Day Air 

FILED
COMPUTER
2020 JUN 29 PM 12:06
JOHN T. FREY
CLERK, CIRCUIT COURT
FAIRFAX, VA

John T. Frey, Clerk of Court
Fairfax County Circuit Court
3rd Floor, Civil Case Processing
4110 Chain Bridge Road, Suite 320
Fairfax, VA 22030

Re: John C. Depp, II v. Amber Laura Heard
Civil Action No. CL-2019-0002911
Specially Assigned to: Chief Judge Bruce D. White

Dear Mr Frey:

Enclosed for filing in the above-referenced matter, please find the BRIEF OF ASHLEY RUTH MOYÉ AS *AMICUS CURIAE* IN SUPPORT OF PLAINTIFF'S TRIAL BRIEF, pursuant to Rule 5:30(b)(i) of the Rules of the Supreme Court of Virginia. Also enclosed are a courtesy copy for Chambers, and an additional courtesy copy.

As confirmation, per previous instructions from your office, there is no fee for the filing of an *Amicus* Brief

Respectfully, I remain,



Ashley R. Moyé

Enclosures