

We have reviewed the complaint filed by Jeffrey Beck and Johnny Depp against SUNY Buffalo Distinguished Professor and James Agee Professor of American Culture and internationally esteemed folklorist Bruce Jackson.

Virtually every word in the song was lifted directly from the words spoken by Willie Davis's (a/k/a Slim Wilson), to Bruce Jackson on June 23, 1964, while Slim was in Missouri State Prison. They were recorded and preserved by Bruce Jackson and the originals repose in the Library of Congress. ¹Slim Wilson though, at the time of the recording, himself made no claim that he wrote the lyrics; he claimed he heard it from his father, who himself was steeped in the deep African-American oral tradition of "toasts," a pre-cursor and progenitor of hip-hop and rap.

The only people who have claimed authorship are the two people who did not write it and could not have written it--Johnny Depp and Jeff Beck. Indeed, the lawsuit seems to admit as much claiming that the work has no copyright because it is part of a folk tradition. Yet Johnny Depp and Jeff Beck claim authorship; first on the digital release of *I8*, and, later, on the vinyl release of *I8*.

Professor Jackson stated "By passing off Slim Wilson's words as his own, Johnny Depp publicly inhabits another man's life and artistry, his pain and his poetry, his beauty and his ugliness, and passes it off as his own lived experience. Indeed, one Depp fan stated publicly that they thought the song was about Johnny Depp's break-up with Amber Heard. This not only obliterates the legacy of Slim Wilson, it blinds the audience to the African-American tradition that gave rise to such words."

"Many writers repurpose and re-arrange folk songs they did not write," said Jackson. But they always acknowledge the original folk traditional, and if possible, the literary history of the work. They do not claim they wrote the song."

"It did not have to be this way," Jackson continued. A simple change in the liner notes acknowledging the song's original would have settled this matter."

Professor Jackson has not made any formal demands for monetary damages from the rock duo, and as we previously informed Depp and Beck's counsel, any money he may be provided in a settlement of this matter would be donated directly to organizations that seek to preserve African American culture and traditions. Professor Jackson has spent over 60 years working toward preserving important forms of African American culture and traditions through photographs, recordings, books, and documentary film productions, has a very good life, and does not want a single tainted dime from anyone associated with Depp or Beck. It indeed is a "sad motherfucking parade."

Defense counsel for Professor Jackson have stated their intention to file a motion to dismiss for failure to state a claim.

¹"Hobo Ben" was performed by Willie Davis, a/k/a Slim Wilson, and was recorded by Professor Jackson, at the Missouri State Penitentiary on June 23, 1964. Mr. Jackson later transcribed "Hobo Ben"; it appears in both his 1974 Harvard University Press and 2004 Routledge book editions, and his Rounder LP and CD album liner notes. It is our belief that the *only* source of Hobo Ben was Mr. Jackson's book and record *Get Your Ass in the Water and Swim Like Me*.