

EXHIBIT A

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SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

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SEAN PENN, an individual,

Plaintiff,

- against -

LEE DANIELS, an individual, and
JOHN DOES 1-100,

Defendants.

-----X

STATE OF NEW YORK)
) ss.:
COUNTY OF NEW YORK)

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: Index No. 159710/2015
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:
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: **DECLARATION OF**
: **MADONNA LOUISE CICCONE**

MADONNA LOUISE CICCONE, declares, under penalty of perjury, the following:

1. I am a singer, songwriter, producer, actress, businesswoman, and philanthropist. I currently reside in the State of New York. From approximately August, 1985 through September, 1989, I was married to Sean Penn, the plaintiff in the above-captioned action. I make this Declaration based on my personal knowledge of events that occurred both during and subsequent to our marriage and would testify to such at deposition.

2. I have known Sean Penn for over thirty years. Over the decades, I have known Sean to be a caring, compassionate individual, as well as an extremely talented actor, creative artist, and philanthropist, including in connection with his work as CEO of the J/P Haitian Relief Organization.

3. I am aware of the allegations that have surfaced over the years accusing Sean of incidents of physical assault and abuse against me. Specifically, I am aware of the allegations concerning an alleged incident that occurred in June, 1987, whereby (according to tabloid reports), Sean allegedly struck me with “a baseball bat.” I know the allegations in those and other reports to be completely outrageous, malicious, reckless, and false.

4. I am also aware of allegations concerning an incident that occurred in December, 1989, which purportedly resulted in Sean’s arrest for domestic assault and battery against me. I know those allegations to be false. While we certainly had more than one heated argument during our marriage, Sean has never struck me, “tied me up,” or physically assaulted me, and any report to the contrary is completely outrageous, malicious, reckless, and false.

Dated: New York, New York
October 7, 2015



MADONNA LOUISE CICCONE