

WV-100

Petition for Workplace Violence Restraining Orders

Clerk stamps date here when form is filed.

FILED
 Superior Court of California
 MAY 13 2021

Sheriff/Clerk
 By Juan Gonzalez, Deputy
 Susan Gonzalez

Read *How Do I Get an Order to Prohibit Workplace Violence* (form WV-100-INFO) before completing this form. **NOTE: Petitioner must be an employer with standing to bring this action under Code of Civil Procedure section 527.8.** Also fill out *Confidential CLETS Information* (form CLETS-001) with as much information as you know.

1 Petitioner (Employer)

a. Name: The Regents of the University of California
 is a corporation sole proprietorship
 (specify) : Public Entity
 and is filing this suit on behalf of the employee identified in item 2.

b. Lawyer for Petitioner (if any for this case)
 Name: Brendan T. Sapien, Esq. State Bar No.: 274247
 Firm Name: LEWIS BRISBOIS BISGAARD & SMITH LLP

Petitioner's Address (If the petitioner has a lawyer, give the lawyer's information.)

c. Address: 633 West 5th Street, Suite 4000
 City: Los Angeles State: CA Zip: 90071
 Telephone: (213) 580-3904 Fax: (213) 250-7900
 E-Mail Address: Brendan.Sapien@lewisbrisbois.com

Fill in court name and street address:

Superior Court of California, County of
 Los Angeles
 111 N. Hill Street
 Los Angeles, CA 90011

Court fills in case number when form is filed.

Case Number:
21STR002326

2 Employee in Need of Protection

Full Name: [REDACTED]
 Sex: M F Age: [REDACTED]

3 Respondent (Person From Whom Protection Is Sought)

Full Name: Matthew Harris Age: 30
 Address (if known): 10959 Rochester Ave, Apt 405
 City: Los Angeles State: CA Zip: 90024

4 Additional Protected Persons

a. Are you asking for protection for any family or household members of the employee or for any other employees at the employee's workplace or at other workplaces of the petitioner?

Yes No (If yes, list them):

Full Name	Sex	Age	Household Member?	Relationship to Employee
<u>[REDACTED]</u>	<u>M</u>	<u>[REDACTED]</u>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<u>Co-Worker</u>
_____	_____	_____	<input type="checkbox"/> Yes <input type="checkbox"/> No	_____
_____	_____	_____	<input type="checkbox"/> Yes <input type="checkbox"/> No	_____

Additional protected persons are listed in Attachment 4a.

This is not a Court Order.

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Case Number: _____

4 b. Why do these people need protection? (Explain):
 Response is stated in Attachment 4b.

5 Relationship of Employee and Respondent

a. How does the employee know the respondent? (Describe): Response is stated in Attachment 5a.

b. Respondent is is not a current employee of petitioner. (Explain any decision to retain, terminate, or otherwise discipline the respondent): Response is stated in Attachment 5b.

6 Venue

Why are you filing in this county? (Check all that apply):

- a. The respondent lives in this county.
- b. The respondent has caused physical or emotional injury to the petitioner's employee in this county.
- c. Other (specify): _____

7 Other Court Cases

a. Has the employee or any of the persons named in 4 been involved in another court case with the respondent?

No Yes If yes, check each kind of case and indicate where and when each was filed:

	Kind of Case	Filed in (County/State)	Year Filed	Case Number (if known)
(1)	<input type="checkbox"/> Workplace Violence	_____	_____	_____
(2)	<input type="checkbox"/> Civil Harassment	_____	_____	_____
(3)	<input type="checkbox"/> Domestic Violence	_____	_____	_____
(4)	<input type="checkbox"/> Divorce, Nullity, Legal Separation	_____	_____	_____
(5)	<input type="checkbox"/> Paternity, Parentage, Child Support	_____	_____	_____
(6)	<input type="checkbox"/> Eviction	_____	_____	_____
(7)	<input type="checkbox"/> Guardianship	_____	_____	_____
(8)	<input type="checkbox"/> Small Claims	_____	_____	_____
(9)	<input type="checkbox"/> Postsecondary School Violence	_____	_____	_____
(10)	<input type="checkbox"/> Criminal	_____	_____	_____
(11)	<input checked="" type="checkbox"/> Other (specify): Gun Violence Restraining Order	_____	_____	_____

b. Are any restraining orders or criminal protective orders now in effect relating to the employee or any of the persons in 4 and the respondent? No Yes (If yes, attach a copy if you have one.)

This is not a Court Order.

05/17/21

Case Number:

8 Description of Respondent's Conduct

- a. Respondent has (check one or more):
 - (1) Assaulted, battered, or stalked the employee
 - (2) Made a credible threat of violence against the employee by making knowing or willful statements or engaging in a course of conduct that would place a reasonable person in fear for his or her safety or the safety of his or her immediate family.
- b. One or more of these acts (check either or both):
 - (1) Took place at the employee's workplace
 - (2) Can reasonably be construed to be carried out in the future at the employee's workplace
 Address of workplace: University of California, Los Angeles, Los Angeles, CA 90095
University of California, Irvine, Irvine, CA 92697

c. Describe what happened. (Provide details; include the dates of all incidents beginning with the most recent; tell who did what to whom; identify any witnesses):

Response is stated in Attachment 8c.

See also Declaration of [REDACTED], Director of Employee and Labor Relations and the Chair of Behavioral Intervention Team at UCLA

See also Declaration of [REDACTED], Person to Be Protected

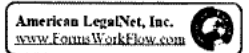
d. Was the employee harmed or injured? Yes No (If yes, describe harm or injuries):

Response is stated in Attachment 8d.

e. Did the respondent use or threaten to use a gun or any other weapon? Yes No (If yes, describe):

Response is stated in Attachment 8e.

This is not a Court Order.



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Case Number: _____

- 8 f. For any of the incidents described above, did the police come? Yes No I don't know
 If yes, did the employee or the respondent receive an Emergency Protective Order?
 Yes No I don't know
 If yes, the order protects (*check all that apply*):
 the employee the respondent one or more of the persons in 4.
 (*Attach a copy of the order if you have one.*)

Check the orders you want

9 **Personal Conduct Orders**

I ask the court to order the respondent **not** to do any of the following things to the employee or to any person to be protected listed in 4 :

- a. Harass, intimidate, molest, attack, strike, stalk, threaten, assault (sexually or otherwise), hit, abuse, destroy personal property of, or disturb the peace of the person.
- b. Commit acts of unlawful violence on or make threats of violence to the person.
- c. Follow or stalk the person during work hours or to or from the place of work.
- d. Contact the person, either directly or indirectly, by **any** means, including, but not limited to, in person, by telephone, in writing, by public or private mail, by interoffice mail, by e-mail, by text message, by fax, or by other electronic means.
- e. Enter the person's workplace.
- F. Other (*specify*):
 As stated in Attachment 9f.

Send emails or voicemails to any of the protected individuals

Enter the campuses of any UC University, particularly UCLA and UC Irvine.

The respondent will be ordered not to take any action to get the addresses or locations of any protected person unless the court finds good cause not to make the order.

10 **Stay-Away Order**

a. I ask the court to order the respondent to stay at least 100 yards away from (*check all that apply*):

- (1) The employee.
- (2) The other persons listed in 4.
- (3) The employee's workplace.
- (4) The employee's home.
- (5) The employee's school.
- (6) The school of the employee's children.
- (7) The place of child care of the employee's children.
- (8) The employee's vehicle.
- (9) Other (*specify*):
UCLA Campus
UC Irvine Campus
Campus of all UC Universities

This is not a Court Order.

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- 10 b. If the court orders the respondent to stay away from all the places listed above, will he or she still be able to get to his or her home, school, or job? Yes No (If no, explain):
 Response is stated on Attachment 10b.

11 Guns or Other Firearms and Ammunition

Does the respondent own or possess any guns or other firearms? Yes No I don't know

If the judge grants a protective order, the respondent will be prohibited from owning, possessing, purchasing, receiving, or attempting to purchase or receive a gun, other firearm, and ammunition while the protective order is in effect. The respondent will also be ordered to turn in to law enforcement, or sell to or store with a licensed gun dealer, any guns or firearms within his or her immediate possession or control.

12 Temporary Restraining Order

I request that a Temporary Restraining Order (TRO) be issued against the Respondent to last until the hearing. I am presenting form WV-110, Temporary Restraining Order, for the court's signature together with this Petition.

Has the Respondent been told that you were going to go to court to seek a TRO against him/her?

Yes No (If you answered no, explain why below):

Reasons are stated in Attachment 12.

13 Request for Less Than Five Days' Notice of Hearing

You must have your papers personally served on the respondent at least five days before the hearing, unless the court orders a shorter time for service. (Form WV-200-INFO explains what is proof of personal service. Form WV-200, Proof of Personal Service, may be used to show the court that the papers have been served.)

If you want there to be fewer than five days between service and the hearing, explain why:

Reasons are stated in Attachment 13.

14 No Fee for Filing

I ask that there be no filing fee because the respondent has threatened violence against the employee, or stalked the employee, or acted or spoken in a manner that has placed the employee in reasonable fear of violence.

This is not a Court Order.

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15 **No Fee to Serve Orders**

I ask the court to order the sheriff or marshal to serve the respondent with the others for free because this request for orders is based on a credible threat of violence or stalking.

16 **Court Costs**

I ask the court to order the respondent to pay my court costs.

17 **Additional Orders Requested**


I ask the court to make the following additional orders (*specify*):

Additional orders requested are stated in Attachment 17.

18 Number of pages attached to this form, if any: 25

Date: 5/13/2021

Brendan T. Sapien, Esq.
Lawyer's name (if any)


Lawyer's signature

I declare under penalty of perjury under the laws of the State of California that the information above and on all attachments is true and correct.

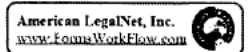
Date: 5/13/2021

[Redacted] on behalf of Petitioner Regents
of the University of California
Name of petitioner
Director of Employee & Labor Relations, UCLA
Campus Human Resources
Title

DocuSigned by:

2FACC63B316549A...
Signature

This is not a Court Order.



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The Regents of the University of California
Petition for Workplace Restraining Order Attachment

Petitioner: The Regents of the University of California
Respondent: Matthew Harris

Attachment 4(b), 5(a), 5(b), 8(c), and 8(e):

On or about April 10, 2020, Petitioner's employee was forwarded a series of emails wherein Respondent Harris had made explicit, detailed, and targeted death threats against Petitioner's employee, Prof. [REDACTED] (Employee in Need of Protection). As further outlined below – the credible, calculated, detailed, and graphic nature of these death threats warrant the Court's granting of a Temporary Restraining Order and Permanent Restraining Order in this matter.

Provided below are a series of emails from Respondent Harris to his mother, which were forwarded to Petitioner by Respondent's mother.

From: "Matthew C. Harris, Ph.D." <matthew.harris732@gmail.com>
Date: January 21, 2021 at 5:41:34 PM EST
To: [REDACTED] >
Subject: Plans to murder [REDACTED] in September when UC Irvine reopens with a MP5 for giving me schizophrenia

Just so you know.

I will probably be moving closer to Irvine's campus so that I can hunt this bitch down and put bullets in her skull.

My psychiatrist said good luck and told me I have schizophrenia.

Now I get shouted at all day and frankly I'm ready to go Chris domer on these white people.

[REDACTED] will be the first person AS SOON AS THE CAMPUS OPENS IN SEPTEMBER IM SPILLING THAT BITCHES SKULL.

See Declaration of [REDACTED] Director Employee & Labor Relations, UCLA Campus Human Resources ¶ 5, Exhibit A.

From: "Matthew C. Harris, Ph.D." <matthew.harris732@gmail.com>
Date: January 6, 2021 at 3:11:00 AM EST
To: [REDACTED] >
Subject: SANDY HOOK 2 PROFESSOR SHOOTS EVERYBODY

See [REDACTED] Dec. ¶ 5, Exhibit B.

There is no ambiguity in these death threats and, based on such, Petitioner and its employees maintain a credible fear that Respondent may carry out his death threats against its Employee. Respondent's conduct has steadily escalated – from reported incidents of conduct with students involving graphic materials of a sexual and violent nature, which resulted in

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Respondent being placed on investigatory leave from Petitioner, to now outright death threats to Petitioner's Employee. See Declaration of [REDACTED] Director Employee & Labor Relations, UCLA Campus Human Resources ¶ 4-9. See Declaration of [REDACTED] ¶ 4-6, Exhibit C.

Ms. [REDACTED] first met Respondent in 2013, while she was a Visiting Assistant Professor at Duke University, and Respondent was a graduate student. See [REDACTED] Decl. ¶ 7. She had very minimal contact with Respondent while at Duke, but, years later, in late September of 2020 Respondent emailed her seeking to discuss career advice, as he had recently moved to Los Angeles. See [REDACTED] Decl. ¶ 7-9. Ms. [REDACTED] was first happy to meet with Respondent to discuss potential career options in late September 2020, but their initial interaction left her feeling very uncomfortable and concerned about his behavior. See [REDACTED] Decl. ¶ 10. From there, in late 2020 and early 2021, Respondent began an aggressive campaign of texts and emails to Ms. [REDACTED] asking her over to his house, out for dinners, and asking about her other relationships. See [REDACTED] Decl. ¶ 11. Respondent's ongoing efforts to engage with Ms. [REDACTED] escalated Ms. [REDACTED] initial feelings to now a fear for her safety, and after attempting to ignore his emails and communications, on or about the end of March of 2021, she eventually instructed Respondent to no longer contact her. See [REDACTED] Decl. ¶ 11-12. Shortly thereafter, on or about April 10, 2021, she learned of the death threats Respondent made against her and his threatened calculated plan to execute such. See [REDACTED] Decl. ¶ 13; See Exhibits A, B, C.

Petitioner has just learned from the UCLA Police Department who had been monitoring Respondent Harris's whereabouts that on May 12, 2021 Respondent has been released from a mental health facility and returned to Los Angeles, CA, and there is an urgent and immediate need for a Temporary Restraining Order and Permanent Restraining Order in order to protect Petitioner's targeted employee. See [REDACTED] Dec. ¶ 9; See [REDACTED] Decl. ¶ 14-15. Based on Respondent's detailed death threats, outlined below, there is a credible threat that Respondent will seek out Petitioner's Employee, along with a concern that Respondent may return to his workplace. See [REDACTED] Dec. ¶ 5-9.

The Respondent's mother even goes so far as to explain in discussing her concerns about Respondent's death threats to Ms. [REDACTED] – **"I'm sorry to drop all of this on you out of the blue. I only know that I wouldn't be able to live with myself if I did nothing and someone got hurt."** See [REDACTED] Decl. ¶ 5, Exhibit C.

The credible nature of these death threats is only amplified by Respondent's previously reported conduct towards his students, which resulted in him being placed on investigatory leave by the University of California Los Angeles ("UCLA") on March 30, 2021. These reported interactions ranged from "predatory behavior" to the dissemination of pornographic and violent content to specific students (having no relation to his class) – in some instances manipulating pornographic images to incorporate his student's image. See [REDACTED] Decl. ¶ 5-7.

Upon receiving the emails containing the express death threats against her, Ms. [REDACTED] in extreme fear for her safety and the safety of other Petitioner employees, reported and forwarded these threats to Petitioner, her employer. Due to Respondent's previously reported conduct towards his students, UCLA had already been aware of the concerning behavior of

Respondent Harris and these direct death threats escalated the credible threat. UCLA has engaged the UCLA Police Department as well as its Behavioral Intervention Team, both of which have determined these to be credible and targeted threats of violence warranting the pursuit of this Workplace Violence Restraining Order. See [REDACTED] Decl. ¶ 4-8. Moreover, given the extreme and detailed nature of these death threats, Petitioner has been engaged with the Federal Bureau of Investigation (FBI) to further ensure the safety of Petitioner's employees and monitor Respondent Harris. See [REDACTED] Decl. ¶ 8.

As the Petitioner's witness declarations and documentary evidence make clear, Respondent's conduct and express death threats have established a credible threat of violence and Petitioner's employees are in fear for their safety.

Respondent's conduct of escalated threats of violence and direct death threats, coupled with his anticipated return to Petitioner's premises or seeking to locate Ms. [REDACTED] has caused Petitioner's employees to fear for their safety and the safety of their families. Petitioner moves for a Workplace Violence Restraining Order for the reasons above in order to ensure the protection of Ms. [REDACTED] Petitioner's employee. As a result of the ongoing pattern of concerning and threatening behavior, escalating at Petitioner's workplace, Ms. [REDACTED] and Petitioner's employees are understandably afraid for their safety and fearful of what Respondent may do next. Additionally, given the recent anticipated return to Petitioner's premises following Respondent's release from a mental health facility, Petitioner's employees are now even more fearful that Respondent's express death threats will come to fruition.

Petitioner takes the threats, harassing conduct, and stalking suffered by Petitioner's employees seriously, now moving for this Workplace Restraining Order.

In light of the above, Petitioner has established that Respondent has engaged in a clear course of conduct and a credible threat of violence that would place a reasonable person in fear for their safety, which serves no legitimate purpose whatsoever.

Based upon such, Petitioner requests the Court to grant the Petition for Restraining Order and accompanying Request for Temporary Restraining Order.

Attachment 12

In light of the targeted and detailed death threats of Respondent and documentary evidence of such, along with his previously reported conduct towards his students, Petitioner has shown that Respondent has created a prolonged and now escalating course of conduct which establishes a credible threat of violence by the Respondent.

Moreover, due to the instability and erratic nature of Respondent's threatening conduct, a Temporary Restraining Order is necessary, particularly since Petitioner's employee is currently operating in a state of high alert and fear generated by Respondent's recent release from a mental health facility. Given the extreme nature of Respondent's death threats, providing notice of these requested orders and the Temporary Restraining Order, prior to their effect, will only provoke Respondent, placing the safety of Petitioner's employees and students at risk.

**EPO-002
GUN VIOLENCE EMERGENCY PROTECTIVE ORDER**

LAW ENFORCEMENT CASE NUMBER:

1. RESTRAINED PERSON (insert name): Matthew Christopher Harris
 Address or Mailing Address: 10959 Rochester Avenue #402, Los Angeles, CA 90024
505
 Sex: M F Ht.: 6'00 Wt.: 200 Hair color: Brown
 Eye color: Brown Race: Black Age: 30 Date of birth: 12/05/1990

Clerk stamps date here when form is filed.

2. TO THE RESTRAINED PERSON (also see important Warnings and Information on page 2):
 You are required to surrender all firearms, ammunition, and magazines that you own or possess in accordance with section 18120 of the Penal Code and you may not have in your custody or control, own, purchase, possess, or receive, or attempt to purchase or receive, any firearm, ammunition, or magazine while this order is in effect. However a gun violence restraining order that lasts from 1 - 5 years may be obtained from the court. You may seek the advice of an attorney as to any matter connected with the order. The attorney should be consulted promptly so that the attorney may assist you in any matter connected with the order.
 If you have any firearms, ammunition, and magazines, you MUST IMMEDIATELY SURRENDER THEM if asked by a police officer. If a police officer does not ask you to surrender any of the above, within 24 hours of getting this order, you must take them to a police station or a licensed gun dealer to sell or store them and must file a receipt with the court proving that this has been done. You have 48 hours to file a receipt with the court shown to the right. If you do not file a receipt within 48 hours you have violated this order and can go to jail.

Fill in court name and street address:
Superior Court of California, County of

3. This order will last until: 6/1/2021 Time 1231
INSERT DATE OF 21st CALENDAR DAY (DO NOT COUNT DAY THE ORDER IS GRANTED)

Court fills in case number when form is filed.
 Case Number:
T 21003903

4. Court Hearing A court hearing will be set within 21 days.
 A court hearing will take place at the court above on: Date: _____ Time/Dept: _____

You must go to the court hearing if you do not want this restraining order against you. At the hearing, the judge can make this order last from 1 - 5 years.

5. Reasonable grounds for the issuance of this order exist, and a Gun Violence Emergency Protective Order (1) is necessary because the Restrained Person poses an immediate danger of causing personal injury to himself or herself or to another by having custody or control, owning, purchasing, possessing, or receiving any firearms, ammunition, or magazines; and (2) less restrictive alternatives were ineffective or have been determined to be inadequate or inappropriate under the circumstances.

6. Judicial officer (name): THERESA MCGONIGLE granted this order on (date): 5/12/21 at (time): 12:33 PM

APPLICATION

7. Officer has a reasonable cause to believe that the grounds set forth in item 5, above, exist (state supporting facts and dates; specify weapons—number, type and location):

HARRIS HAS THREATENED TO HARM OTHERS BY STATING HE PLANS TO MURDER A FORMER COLLEAGUE USING A "MPS". THE STATEMENT WAS MADE VIA EMAILS FROM JANUARY 2021 TO APRIL 2021. HARRIS HAS MADE DIRECT REFERENCES TO PAST ACTIVE SHOOTERS/SHOOTINGS BY SAYING, "I'M READY TO GO CHRIS DORNER ON THESE WHITE PEOPLE," AND "SANDY HOOK 2 PROFESSOR SHOTS EVERYBODY."

8. Firearms were observed reported searched for at the scene seized.
 Ammunition (including magazines) was observed reported searched for at the scene seized.
 I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

By: F. LEON (PRINT NAME OF LAW ENFORCEMENT OFFICER)
 Agency: UCLA PD Telephone No: 310-825-1491 Badge No: 374
 Address: 601 Westwood Plaza, Los Angeles, CA 90095

PROOF OF SERVICE

9. I personally delivered copies of this Order to the restrained person name in item 1.
 Date of service: 5/12/21 Time of service: 2:51 PM Address: 10959 Rochester Ave #505 LOS ANGELES, CA 90024
 10. At the time of service, I was at least 18 years of age.
 I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.
 Date: F. LEON (TYPE OR PRINT NAME OF SERVER/LAW ENFORCEMENT OFFICER)
 (SIGNATURE OF SERVER)

05/17/21

PAGE 01 05/12/21 16:05:40 UCPK PRINT REQUESTED BY TERMINAL UC0K
TO: UC0K FROM: CLETS 05/12/21 16:05:16
4BRSAUC0KF.UB
8BYX CARPOS ENTRY
FCN/7642113200969
ORI/CA0199700
OCA/210524

*** SERVED EMERGENCY GUN VIOLENCE ORDER ***
DO NOT ARREST OR DETAIN BASED SOLELY ON THIS RESPONSE
THIS RESTRAINING ORDER RESPONSE MAY BE THE SAME AS:

***** RESPONDENT INFORMATION *****
RESPONDENT/HARRIS, MATTHEW CHRISTOPHER DOB/19901205
SEX/M RAC/B HGT/600 WGT/200 EYE/BRO HAI/BRO
OLN/H0670529631290.NJ.2015
ADR/10959 ROCHESTER AV 505
CTY/LOS ANGELES STT/CA ZIP/90024

***** PETITIONER INFORMATION *****
PETITIONER/LEON, FABIOLA
RELATIONSHIP TO RESPONDENT/LAW ENFORCEMENT
AGENCY NAME/UNIV OF CA POLICE LOS ANGELES

***** COURT INFORMATION *****
RESPONDENT PRESENT IN COURT/NO
COURT NAME/LOS ANGELES COUNTY SUPERIOR (LOS ANGELES)
COURT PHONE NUMBER/(213) 351-7599
COURT CASE NUMBER/T21003903
ISSUE DATE/20210512 EXPIRATION DATE/20210601

FINDINGS/REASONABLE GROUNDS FOR THE ISSUANCE OF THIS ORDER EXIST AND IT IS NECESSARY TO PREVENT PERSONAL INJURY TO THE RESPONDENT OR OTHER PEOPLE BY HAVING CUSTODY, CONTROL, OWNING, PURCHASING, POSSESSING OR RECEIVING A FIREARM. LESS RESTRICTIVE ALTERNATIVES WERE INEFFECTIVE OR HAVE BEEN DETERMINED TO BE INADEQUATE OR INAPPROPRIATE FOR THE CURRENT CIRCUMSTANCES.

FIREARMS PROVISION/RESPONDENT CANNOT HAVE CUSTODY, CONTROL, OWN, PURCHASE, POSSESS, RECEIVE, OR ATTEMPT TO PURCHASE OR RECEIVE, ANY FIREARM OR AMMUNITION INCLUDING MAGAZINES. RESPONDENT MUST SURRENDER TO A LOCAL LAW ENFORCEMENT OFFICER OR AGENCY ALL FIREARMS AND AMMUNITION INCLUDING MAGAZINES IN THEIR CUSTODY OR CONTROL OR THAT THEY POSSESS OR OWN WITHIN 24 HOURS OF RECEIVING THIS ORDER, AND FILE A RECEIPT WITH THE COURT TO PROVE THAT THE GUNS OR FIREARMS HAVE BEEN TURNED IN OR SOLD. RESPONDENT MUST ALSO FILE A COPY OF THE RECEIPT WITH THE LEA THAT SERVED THIS ORDER. UPON REQUEST FROM A LAW ENFORCEMENT OFFICER THEY MUST IMMEDIATELY SURRENDER ANY FIREARMS IN THEIR POSSESSION.

***** SERVICE INFORMATION *****
SERVED DATE/20210512 TIME/1451
SERVED BY/LEON, FABIOLA/374
AGENCY/UNIV OF CA POLICE LOS ANGELES
IMMEDIATELY CONFIRM WITH CA0199700 UC-LOS ANGELES PD UCLO
TELEPHONE 310 825-1491
***** END OF CARPOS MESSAGE *****

05/17/21

DECLARATION OF PROF. [REDACTED]

I, [REDACTED], declare as follows:

1. I have personal knowledge of the facts set forth herein, and if called as a witness to testify thereto, I could competently and truthfully do so.

2. I make this Declaration in Support of Petitioner Regents of the University of California's Petition for a Workplace Violence Restraining Order against Respondent Matthew Harris.

3. I am an Assistant Professor of Philosophy at the University of California, Irvine.

4. On or about April 10, 2021, I was forwarded a series of emails by Respondent Harris's mother wherein Respondent Harris made explicit and targeted threats against me.

5. Attached as "Exhibit C" is a true and correct copy of the emails from Respondent Harris, which were sent to my email address by Respondent Harris's mother. Based on prior emails I have received from Respondent Harris, I can confirm that the emails containing these threats were sent from Respondent Harris's email address.

6. Upon receiving the emails from Respondent's mother expressing concern for my safety, I reported and forwarded these threats to Petitioner Regents of the University of California, my employer.

7. I first met Respondent Harris in 2013, while I was a Visiting Assistant Professor at Duke University, and Respondent Harris was a graduate student.

8. I had very minimal contact with Respondent Harris while at Duke.

9. Years later, in late September of 2020, Respondent Harris emailed me seeking to discuss career advice, as he had recently moved to Los Angeles.

10. I was at first happy to meet with Respondent Harris to discuss potential career options in late September 2020, but our initial interaction left me feeling very uncomfortable and concerned about Respondent Harris's behavior.

05/17/21

11. From there, in late 2020 and early 2021, Respondent Harris began frequently texting and emailing me, asking me over to his house, out for dinners, and asking about my other relationships. I declined all such invitations.

12. Respondent Harris's ongoing efforts to meet with me, escalated my initial uncomfortable feelings to a fear for my safety, and after attempting to ignore his emails and communications, on or about the end of March of 2021, I instructed Respondent Harris to no longer contact me.

13. Shortly thereafter, on or about April 10, 2021, Respondent Harris's mother emailed me expressing concern for my safety due to threats that Respondent Harris made against me and his threatened calculated plan to execute them.

14. Moreover, upon reaching out to my employer to express this concern for my safety based on these emails, I was informed by the UCLA Police Department of the express death threats that Respondent Harris made against me.

15. Due to the prolonged and intensifying course of conduct by Respondent Harris, which ultimately culminated in calculated and targeted death threats against me, I fear for my safety and the safety of my co-workers and students. I am afraid that Respondent Harris will carry out his threats against me.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that this declaration was executed on May 13, 2021, at _____, Los Angeles, CA, California.

DocuSigned by:

35E022FC46004DE

05/17/21

EXHIBIT A

05/17/21

[REDACTED]

From: [REDACTED]
Sent: Tuesday, April 13, 2021 12:39 PM
To: [REDACTED]
Subject: Fwd: Plans to murder [REDACTED] in September when UC Irvine reopens with a MP5 for giving me schizophrenia

Follow Up Flag: Follow up
Flag Status: Flagged

Sent from my iPhone

Begin forwarded message:

From: "Matthew C. Harris, Ph.D." <matthew.harris732@gmail.com>
Date: January 21, 2021 at 5:41:34 PM EST
To: [REDACTED]
Subject: Plans to murder [REDACTED] in September when UC Irvine reopens with a MP5 for giving me schizophrenia .

Just so you know.

I will probably be moving closer to Irvine's campus so that I can hunt this bitch down and put bullets in her skull.

My psychiatrist said good luck and told me I have schizophrenia.

Now I get-shouted at all day and frankly I'm ready to go Chris dorner on these white people.

[REDACTED] will be the first person AS SOON AS THE CAMPUS OPENS IN SEPTEMBER IM SPILLING THAT BITCHES SKULL.

05/17/21

EXHIBIT B

[REDACTED]

From: [REDACTED]
Sent: Tuesday, April 13, 2021 12:36 PM
To: [REDACTED]
Subject: Fwd: SANDY HOOK 2 PROFESSOR SHOOTS EVERYBODY

Sent from my iPhone

Begin forwarded message:

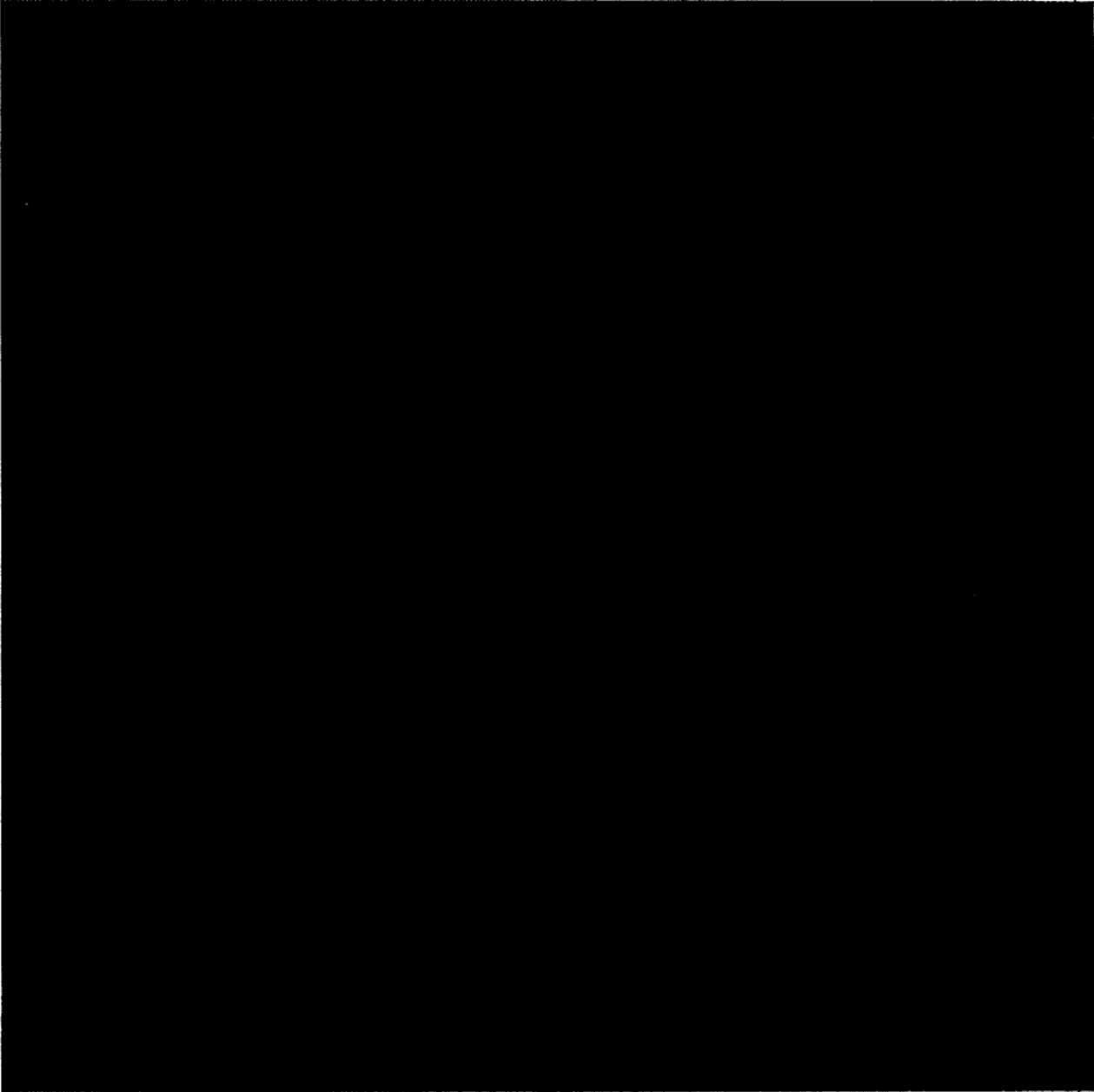
From: "Matthew C. Harris, Ph.D." <matthew.harris732@gmail.com>
Date: January 6, 2021 at 3:11:00 AM EST
To: [REDACTED]
Subject: SANDY HOOK 2 PROFESSOR SHOOTS EVERYBODY

EXHIBIT C

Best Available Image

02/18/2021

05/10/21
05/10/21
04/28/21



From: [REDACTED]
Date: Sat, Apr 10, 2021 at 3:24 PM
Subject: Re: ****Please Read****
To: [REDACTED]

Hi [REDACTED]

Yes, I discovered that info during my search.
My head is spinning.
I'd expected him be out of here yesterday. I'm not used to this aggression.

I've just gotten more bad news.

Per my husband, both Matthew's drivers license and passport have expired and I may be saddled with this person a while longer.

I don't know how he was allowed to fly here in the first place.

I have some things to think about now.

And yes, the emails are threatening. I felt physically ill reading them.

Let me track them down and possibly muster up the courage to share them with you.

[REDACTED]

I don't check my email often. You may text me if you like.

[REDACTED]

Sent from my iPhone

On Apr 10, 2021, at 5:44 PM, [REDACTED] <[REDACTED]>
wrote:

Hi [REDACTED]

I'm so sorry that this is happening. I do know Matthew. He sent me a number of emails and texts. I was a visiting professor at Duke while he was there and now live in LA. We saw each other once to talk about job advice in the fall. After that he began to contact me regularly. I was concerned by the content of the communication and asked him to stop contacting me. He has not been in touch since then (perhaps a month ago). I also was not responding for many months before that.

Are you aware of the situation at UCLA? It sounds like there were a number of issues with how he interacted with students and that he had inappropriate and violent content on his YouTube channel. I believe there is an investigation ongoing now. I am also concerned that someone, Matthew or someone else, might get hurt and agree that he does need help.

Please feel free to reach out if you want to talk more. I'm glad you emailed me.

- [REDACTED]

On Sat, Apr 10, 2021 at 1:42 PM [REDACTED]
[REDACTED] wrote:

My name is [REDACTED] and I am the mother of Matthew Harris.
Are you familiar with this person?

I'm writing because I recently received a number of disturbing
emails from my son, two of which mention you by name.

It has been five years since I saw him last so his, completely
unannounced, visit this week has been quite the eye opener. This
led me to do a search of his name and I have reason to believe that
he is seriously in need of some sort of psychiatric help.

My husband does not share my concern. I've attempted to share this
information with him, but unfortunately I do not have his support.
He believes I'm "overreacting" and refuses to hear any thing
further.

Matthew is still in North Carolina having missed his flight this
morning but I believe he will be back in the Los Angeles area early
next week.

I don't know if he is still in contact with you, but I would advise
you not to respond to him in any way.

Please let me know that you've received this. I could find no other
way to contact you.
I'm unsure how to proceed.

I'm sorry to drop all of this on you out of the blue. I only know that
I wouldn't be able to live with myself if I did nothing and someone
got hurt.

Sincerely,
[REDACTED]

Sent from my iPhone

DECLARATION OF [REDACTED]

I, [REDACTED], declare as follows:

1. I have personal knowledge of the facts set forth herein, and if called as a witness to testify thereto, I could competently and truthfully do so.

2. I make this Declaration in Support of Petitioner Regents of the University of California's Petition for a Workplace Violence Restraining Order against Respondent Matthew Harris.

3. I am the Director of Employee & Labor Relations, UCLA Campus Human Resources and I am also the Chair of the Behavioral Intervention Team at UCLA. As part of my duties, I work to ensure the safety of Petitioner's employees and take the appropriate measures to address threats such as those made by Respondent Harris.

4. In April 2021, I received reports that Prof. [REDACTED], an employee of the Petitioner, received death threats from Respondent Harris.

5. In April 2021, I received and reviewed the written death threats made by Respondent Harris against Prof. [REDACTED]. Respondent Harris's mother forwarded Petitioner these death threats against Prof. [REDACTED] which were sent to her from Respondent Harris. Attached as "Exhibit A" and "Exhibit B" are true and correct copies of the emails from Respondent Harris containing these threats that were obtained by the Behavioral Intervention Team. Based on prior emails we have received and reviewed from Respondent Harris, I can confirm that the emails containing these threats were sent from Respondent Harris's email address.

6. The credible nature of these death threats is amplified by previous reports of Respondent Harris's conduct towards his students, which resulted in him being placed on investigatory leave by the University of California Los Angeles ("UCLA") on March 30, 2021.

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7. The reported conduct under investigation ranged from “predatory behavior” to the dissemination of pornographic and violent content to specific students (having no relation to his class) – in some instances pornographic images were manipulated to incorporate a student’s image.

8. UCLA has engaged the UCLA Police Department as well as its Behavioral Intervention Team, both of which have determined the threats against Prof. [REDACTED] to be credible and targeted threats of violence by Respondent Harris warranting the pursuit of this Workplace Violence Restraining Order. Moreover, given the extreme and detailed nature of these death threats, I have been engaged with the Federal Bureau of Investigation (FBI) to further ensure the safety of Petitioner’s employees and monitor Respondent Harris.

9. On May 12, 2021, Petitioner learned from the UCLA Police Department who had been monitoring Respondent Harris’s whereabouts that Respondent Harris had been released from the mental health facility that he had been attending and is currently in Los Angeles, California, making the need for the Workplace Violence Restraining Order and the accompanying TRO immediately necessary.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that this declaration was executed on May 13, 2021, at Los Angeles, California.

DocuSigned by:

[REDACTED]
2FACC63B316549A

05/17/21

EXHIBIT A

05/17/21

[REDACTED]

From: [REDACTED]
Sent: Tuesday, April 13, 2021 12:39 PM
To: [REDACTED]
Subject: Fwd: Plans to murder [REDACTED] in September when UC Irvine reopens with a MP5 for giving me schizophrenia

Follow Up Flag: Follow up
Flag Status: Flagged

Sent from my iPhone

Begin forwarded message:

From: "Matthew C. Harris, Ph.D." <matthew.harris732@gmail.com>
Date: January 21, 2021 at 5:41:34 PM EST
To: [REDACTED]
Subject: Plans to murder [REDACTED] in September when UC Irvine reopens with a MP5 for giving me schizophrenia

Just so you know.

I will probably be moving closer to Irvine's campus so that I can hunt this bitch down and put bullets in her skull.

My psychiatrist said good luck and told me I have schizophrenia.

Now I get shouted at all day and frankly I'm ready to go Chris dorner on these white people.

[REDACTED] will be the first person AS SOON AS THE CAMPUS OPENS IN SEPTEMBER IM SPILLING THAT BITCHES SKULL.

05/17/21

EXHIBIT B

05/17/21

[REDACTED]

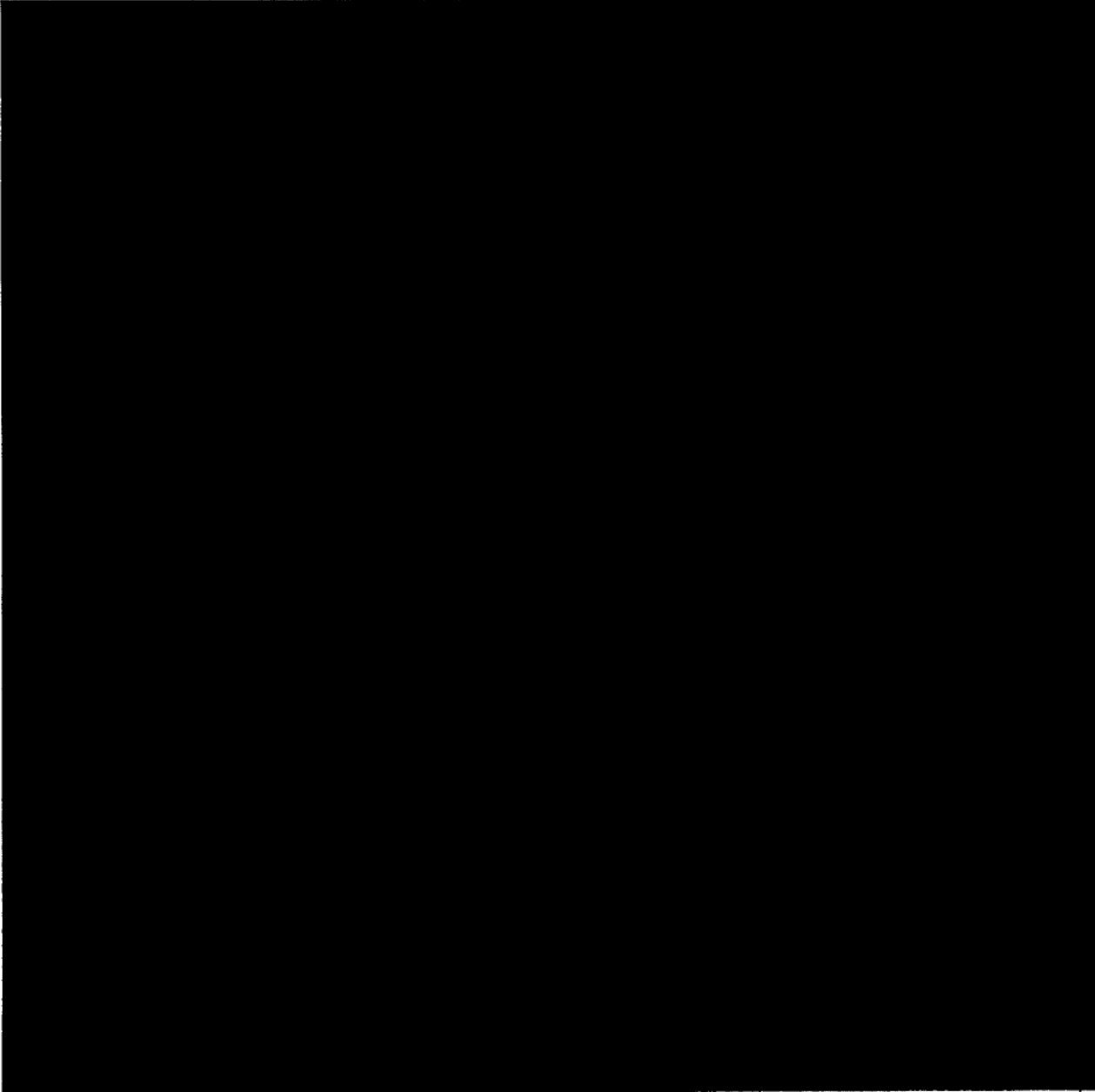
From: [REDACTED]
Sent: Tuesday, April 13, 2021 12:36 PM
To: [REDACTED]
Subject: Fwd: SANDY HOOK 2 PROFESSOR SHOOTS EVERYBODY

Sent from my iPhone

Begin forwarded message:

From: "Matthew C. Harris, Ph.D." <matthew.harris732@gmail.com>
Date: January 6, 2021 at 3:11:00 AM EST
To: [REDACTED]
Subject: SANDY HOOK 2 PROFESSOR SHOOTS EVERYBODY

EXHIBIT C



From: [REDACTED]
Date: Sat, Apr 10, 2021 at 3:24 PM
Subject: Re: **Please Read**
To: [REDACTED]

Hi [REDACTED],

Yes, I discovered that info during my search.
My head is spinning.
I'd expected him be out of here yesterday. I'm not used to this aggression.

I've just gotten more bad news.

Per my husband, both Matthew's drivers license and passport have expired and I may be saddled with this person a while longer.

I don't know how he was allowed to fly here in the first place.

I have some things to think about now.

And yes, the emails are threatening. I felt physically ill reading them.

Let me track them down and possibly muster up the courage to share them with you.

[REDACTED]

I don't check my email often. You may text me if you like.

[REDACTED]

Sent from my iPhone

On Apr 10, 2021, at 5:44 PM, [REDACTED]
wrote:

Hi [REDACTED]

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Are you aware of the situation at UCLA? It sounds like there were a number of issues with how he interacted with students and that he had inappropriate and violent content on his YouTube channel. I believe there is an investigation ongoing now. I am also concerned that someone, Matthew or someone else, might get hurt and agree that he does need help.

Please feel free to reach out if you want to talk more. I'm glad you emailed me.

- [REDACTED]

On Sat, Apr 10, 2021 at 1:42 PM [REDACTED]
[REDACTED] wrote:

[REDACTED]

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Are you familiar with this person?

I'm writing because I recently received a number of disturbing emails from my son, two of which mention you by name.

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Matthew is still in North Carolina having missed his flight this morning but I believe he will be back in the Los Angeles area early next week.

I don't know if he is still in contact with you, but I would advise you not to respond to him in any way.

Please let me know that you've received this. I could find no other way to contact you.
I'm unsure how to proceed.

I'm sorry to drop all of this on you out of the blue. I only know that I wouldn't be able to live with myself if I did nothing and someone got hurt.

Sincerely,
[REDACTED]

Sent from my iPhone