

UNITED STATES DISTRICT COURT

for the

District of Colorado

United States of America)

v.)

MATTHEW CHRISTOPHER HARRIS)

Case No.22-mj-00012-SKC)

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of January 31 and February 1, 2022 in the county of Boulder in the District of Colorado, the defendant(s) violated:

Code Section 18 U.S.C. § 875(c) Offense Description Transmission of threats in interstate commerce

This criminal complaint is based on these facts:

See Affidavit attached hereto and hereby incorporated by reference.

Continued on the attached sheet.

s/ Stephanie Benitez

Complainant's signature

Stephanie Benitez, Special Agent, FBI

Printed name and title

Sworn to before me and signed in my presence. submitted, attested to, and acknowledged by reliable electronic means.

Date: 02/01/2022

Judge's signature

Judge's signature

City and state: Denver, Colorado

Magistrate Judge S. Kato Crews

Printed name and title

DEFENDANT: MATTHEW CHRISTOPHER HARRIS

YOB: 1990

ADDRESS (CITY/STATE): Boulder, Colorado

OFFENSE(S): (1) 18 U.S.C. § 875(c) (threats in interstate commerce)

LOCATION OF OFFENSE (COUNTY/STATE): Boulder County, Colorado

PENALTY: (1) NMT 20 years' imprisonment; NMT 3 years SR, \$250,000 fine; \$100 SA

AGENT: Stephanie Benitez
Special Agent, Federal Bureau of Investigation

AUTHORIZED BY: Julia Martinez
Assistant U.S. Attorney

ESTIMATED TIME OF TRIAL:

five days or less over five days other

THE GOVERNMENT

will seek detention in this case based on 18 U.S.C. § 3142(f)(1)

will not seek detention

The statutory presumption of detention **is not** applicable to this defendant.

OCDETF CASE: Yes No

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

Your affiant, Stephanie Benitez, a Special Agent with the Federal Bureau of Investigation (“FBI”), being duly sworn deposes and states as follows to wit:

1. I am a Special Agent (SA) with the Federal Bureau of Investigation, United States Department of Justice, and have been so employed since 2002. I am currently assigned to the Denver Division of the FBI, specifically to the Loveland Resident Agency, Boulder offsite which covers Boulder, Colorado. I am assigned to work all criminal matters in this jurisdiction to include threatening communications. Prior to my assignment at Boulder, I worked Public Corruption/Civil Rights/Organized Crime. Prior to this assignment in Denver, I was a Supervisory Special Agent (SSA) in the Violent Crime and Civil Rights/Public Corruption Sections at FBI Headquarters, where I supervised federal Color of Law, Hate Crimes, Child Abductions, and Human Trafficking investigations for the FBI. Prior to this assignment, I was an FBI SA in Los Angeles, assigned to the West Covina Resident Agency Organized Crime/Violent Crime Squad. In this capacity I investigated kidnapping, extortion, and organized drug trafficking enterprises.
2. This affidavit is being submitted in support of a criminal complaint and affidavit charging Matthew Christopher Harris (HARRIS) with a violation of Title 18, United States Code, Section 875(c), which prohibits the transmission in interstate or foreign commerce “any communication containing any threat to kidnap any person or any threat to injure the person of another.”
3. Due to the limited purpose of this affidavit, your affiant has not included each and every fact known concerning this investigation, although, to the best of her information, knowledge and belief, your affiant has not omitted any material fact that undermines the statements and conclusions herein. Your affiant has set forth only the facts your affiant believes are necessary to establish probable cause to show that HARRIS committed the listed offense.

INVESTIGATION

4. On January 21, 2021, HARRIS, who is a Philosophy Professor at UCLA, sent his mother, Roslyn Harris, (Roslyn) an email from matthew.harris732@gmail.com with subject titled “Plans to murder Katherine Ritchie in September when UC Irvine reopens with a MP5 for giving me schizophrenia” Dr. Katherine Ritchie (Dr. Ritchie) is a Professor at UC Irvine and a former acquaintance with HARRIS. The email to HARRIS’s mother stated “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 doner on these white people. Katherine Ritchie will be the first person AS SOON AS THE CAMPUS OPENS IN SEPTEMBER IM SPILLING THAT BITCHES SKULL.” At the time, ROSLYN did not notify law enforcement about the email.
5. On March 22, 2021, HARRIS sent Roslyn another email which read, “I’m ready to be dead frankly. But I’m not going to hurt anyone else. honestly, the soonest I can find a way to shoot myself and get away from this shit the better. I’m currently looking into the local gun ranges and although I can’t afford it until I get paid at the end of the month, I’m just letting you know that I plan on finishing this as soon as humanly possible... I’m planning to be dead by early April.” At the time, Roslyn did not notify law enforcement about the email.

6. On March 27, 2021, HARRIS, sent Roslyn another email which read, “Is UC Irvine reopening for classes in person?”
7. On March 30, 2021, HARRIS who was assigned to a research group during the winter quarter was reported to the UCLA Police Department as a subject of concern after he sent approximately 20 emails to various female students in his research group which contained offensive/inappropriate content. The emails featured links to YouTube videos with titles such as, “training little girls,” “Christopher Dorner idolization,” and, “Beat a feminist unconscious.”
8. On April 10, 2021, several UCLA Philosophy Department members were forwarded an email from Roslyn which indicated HARRIS was unwell and had made disturbing comments about his old colleagues.
9. On April 12, 2021 – UCLA PD received an email from Chris Silva, the UCLA Behavioral Intervention Team Coordinator, which had a detailed a phone conversation he had with Roslyn. Silva forwarded the following information in summary:

Roslyn lives in North Carolina with her husband, Dennis Harris. Roslyn has not had a good relationship with her son, HARRIS, for the past two years due to him communicating threats to her via text and email. Roslyn had not seen her son for approximately five years until he suddenly showed up at their residence in North Carolina last week. Roslyn noted her son has been acting strange and started reviewing a series of emails he had been sending her for the past year. The emails contained threats to her, her cat, and to Dr. Ritchie from UCLA. Roslyn described the threats as “violent and specific” and she did not want to share them with Dr. Ritchie because of what they said. Roslyn was currently sleeping with a knife next to her and with her cat in her room with her because she feared what Matthew Harris might do them in their sleep. Roslyn Harris had been pushed shoved by Matthew Harris the day prior after she knocked on his bedroom door and he closed it on her. Roslyn was shoved hard enough she hit the wall behind her. Roslyn did not know her son to abuse drugs or alcohol, and she did not think he had been diagnosed with any mental illness.

10. On April 13, 2021, Silva forwarded UCLA PD several emails from Roslyn which had been sent to her by HARRIS, to include the email sent on January 21, 2021, regarding Dr. Ritchie. On this same date, UCLA PD Sergeant Fabiola Leon was made aware of these emails, she notified Dr. Ritchie of the death threats made by HARRIS. Dr. Ritchie was shocked of the seriousness of the threats and wanted to pursue charges.
11. On April 14, 2021, UCLA PD issued a threat watch briefing on HARRIS. Sergeant Leon called Roslyn and encouraged her to initiate an involuntary commitment to which Roslyn complied. Roslyn then appeared before a magistrate which was facilitated by the Guilford County Sheriff’s Office and the FBI. After the order was signed, the Guilford County Sheriff’s Office and FBI served papers on HARRIS at 8301 Wessex Dr. in Stokesdale, NC without incident. HARRIS was then hospitalized for approximately one month.
12. On or about May 12, 2021, Sergeant Leon learned from the FBI that HARRIS had flight plans to return to Los Angeles, from North Carolina. On the same date, Sergeant Leon called the Los Angeles County Courthouse line in order to request a Gun Violence Emergency Protective Order for HARRIS. The same date, the Honorable Theresa McGonigle granted the order (Case #T21003903).

13. On June 1, 2021, UCLA PD Sergeant Leon sought a 21-day temporary restraining order prohibiting HARRIS from going near any California College campuses, having contact with Dr. Ritchie, and possessing any firearms. Sergeant Leon explained all of these restrictions with HARRIS and also provided him with a copy of the temporary restraining order.
14. On June 7, 2021, another Temporary Restraining Order (three years) was granted in Los Angeles County which was filed by University of California Regents barring HARRIS from California College Campuses, Professor Ritchie (threats victim), and the possession of any weapons. Per legal counsel representing the university, HARRIS did not appear at the hearing in person or remotely. The court authorized mail service to HARRIS to notify him of the extended restraining order.
15. On May 10, 2021, FBI SA Corrie L. Lyle contacted UCLA PD Sergeant Leon regarding HARRIS, a former UCLA associate professor, and possible threats made by HARRIS to another professor. On May 12, 2021, SA Lyle was advised by Sergeant Leon that HARRIS was contacted in Los Angeles and served with an Emergency Gun Violence Protective Order. On May 12, 2021, SA Lyle submitted the Emergency Gun Violence Protective Order to the National Instant Criminal Background Check System Section (NICS) to make HARRIS a prohibited possessor of firearms. On May 13, 2021, SA Lyle was notified by NICS that HARRIS was entered into NICS with an expiration date of July 1, 2021, based on the expiration of the initial restraining order obtained against HARRIS. On June 7, 2021, a Workplace Violence Restraining Order was obtained in the Superior Court of California against HARRIS. This new restraining order was valid through June 4, 2024. On June 8, 2021, SA Lyle received the restraining order obtained against HARRIS and submitted the Restraining Order to NICS via email. On June 8, 2021, SA Lyle received confirmation from NICS that the updated Restraining Order was received and that the expiration was extended through June 4, 2024.
16. On February 1, 2022, I spoke to Roslyn who informed she had not been in contact with HARRIS for approximately five months but learned he had moved to Colorado sometime in summer of 2021. Roslyn also confirmed HARRIS was involuntarily committed for approximately one month and was told by his doctors that he had schizophrenia.
17. On February 1, 2022, I learned HARRIS was issued a Colorado Driver's License on November 2, 2021. Additionally, on February 1, 2022, your affiant learned that HARRIS attempted to purchase a firearm at the Silver Bullet Shooting Range.
18. On the same date, I visited the website associated with the Silver Bullet Shooting Range, a firearms range business located at 5901 West 38th Avenue, Wheat Ridge, Colorado 80212. The homepage section of the site identifies the business as [verbatim] "The Best and Friendliest Indoor Pistol and Rifle Shooting Facility in the Entire Denver Metro Area!" A link present on the homepage is titled [verbatim] "GUN SHOP" with a sub-heading [verbatim] "Consignments Sales for Your Guns." When I accessed the link, I observed numerous advertisements of firearms for sale.
19. Also on February 1, 2022, Federal Bureau of Investigation Task Force Officer (TFO) Michael Thrapp interviewed GUN SHOP EMPLOYEE 1 (GSE-1), an individual whose identity is known to me. Among other things, GSE-1 advised TFO Thrapp that GSE-1 is the manager of the Silver

Bullet Shooting Range. GSE-1 told TFO Thrapp that the Silver Bullet Shooting Range maintains rejected applications for the acquisition of firearms; these applications are maintained as Bureau of Alcohol, Tobacco, Firearms and Explosives form 4473, titled "Firearms Transaction Record." GSE-1 located and provided TFO Thrapp with form 4473 and associated records for Matthew Christopher Harris, with HARRIS's date of birth. I have reviewed a copy of these records. Form 4473, Section A, identifies the type of firearm HARRIS sought to purchase as a .38 caliber Smith and Wesson model "Bodyguard" revolver with serial number of CVJ1787. Section B contains the following information:

- a. HARRIS' full name appears as the transferee/buyer;
- b. HARRIS residence is listed as 955 Broadway, Boulder, CO 80302;
- c. HARRIS birthday and Social Security Number;
- d. Harris answered "no" to question 21-f, which states: "Have you ever been adjudicated as a mental defective OR have you ever been committed to a mental institution?"
- e. Harris signed the form, attesting to the truthfulness of Harris' information/response supplied in Section B.
- f. The date accompanying Harris' signature is November 2, 2021.

Section C, completed by the transferor/seller, relates that Harris provided a temporary Colorado Drivers License as identification. A copy of this identification, bearing Harris' photograph was also included in the records. Colorado Bureau of Investigation InstaCheck results were included in these records. The results show that on November 2, 2021, Harris' request to purchase a firearm was denied.

20. Also on February 1, 2022, I reviewed criminal history information from the National Crime Information Center for HARRIS. These records reveal that Harris is prohibited from possession and/or purchasing a firearm as a function of an active restraining order, issued in California, dated June 15, 2021. However, the information I reviewed also states "not served."
21. On January 31, 2022 at approximately 2pm MST, HARRIS sent an email to approximately 35 individuals from matthewharris468@yahoo.com directing them to a google drive containing an 803 page "manifesto" titled "death sentences" by Dr. Matthew C Harris. He also directs them to his youtube channel which contains a video called "UCLA PHILOSOPHY (MASS SHOOTING)" which depicts HARRIS talking with images from the 2003 movie Zero Day, which depicts a movie version of the surveillance cameras at the Columbine school shooting. In his death sentences he makes several references to killing a friend named Ritchie and a cousin named Ritchie. (Your affiant does not know if this is a veiled reference to Dr. Ritchie). Several of the recipients of the email contacted the FBI including Bonnie Veronese. Veronese advised the email (and attachments) contains several threats to UCLA and Duke Universities, political figures, former coworkers and former students. Within the email titled "Death sentences by the Nigger Dr. Matthew C. Harris" is an 803-page manifesto outlying Harris' hatred for various entities. Harris stated: "Kill all crackers for being the enemy of Niggers for 450 years!" repetitively over 23 pages, "Hunt, track, trace, execute, kill every may and congressmen, niggers kill the president" Kill all non-niggers," "Mass murder is the only way," "End America," and many more threats. HARRIS mentions, by name, former Head of the Philosophy Department Gavin Lawrence, former students Luka Gidwani and Katrina Akbarian.

22. On January 31, 2022, your affiant briefly reviewed the 803 page document and through a word search and noted these words appeared in alarming frequency:

- Kill- approximately 7512 times
- Death – approximately 452 times
- Murder – approximately 253 times
- Die – approximately 711 times
- Shoot – approximately 2514 times
- Bomb – approximately 2489 times
- Blow up – approximately 26 times
- Stab – approximately 73 times
- Drown – approximately 19 times
- Rape – approximately 111 times

23. The manifesto contains numerous and repeated quotes advocating acts of violence against various racial and ethnic groups including:

- “KILL EVERYONE WHO IS NOT A NIGGER.”
- “KILL WHITE CIVILIZATION.”
- “SHOOT EVERY MAYER WHO IS ASIAN. SHOOT ALL ASIAN POLITICIANS. SHOOT ALL THE ASIAN STOREOWNERS AND COLLEGE STUDENTS. SHOOT ALL THE ASIAN BUSINESSOWNERS AND LAWYERS. SHOOT ALL THE ASIANS.
- SHOOT ALL THE KIKES TOO.”
- “NIGGER kill all of the children of other tribes. KILL ALL THEIR KIDS.”

24. Below are additional quotes observed in the manifesto:

- “BURN AND ATTACK BOULDER OUTSIDE BY THE UNIVERSITY.”
- “GENOCIDE THEM my NIGGER. Schoolyard massacre. University disaster. Take your pick.”
- “Kill her at the university where she works.”
- “Assassinate the toms at the university.”
- “Hunt them where they work. Find out when they will have company gatherings or university welcomings. Kill their children at freshman orientation. Shoot them at the opening weekend.”
- “Bombs at middle schools, no threats. Shot gun columbine university slaying.”
- “Kill the board of trustees at every university.”
- “The richest get shoot in the skull their childrent arent protected at university.”
- “Sandra pretended to be my soulmate and bounced. Even though I moved to her backyard of boulder colorado she never commuted. She could`ve been my jon benet ramsey. Why isn`t my mother dead yet?”
- “Set fire in the woods near mansions or gated communities. Do this all across the country. Do it in grapevine loss angeles. Do it in Boulder colorado. Do it everywhere rich crackers live. Even if they have insurance they`ll be horrified as they watch their mansions and wealth become a target for violence.
- “Kill the fathers of Boulder high school.”
- “I`d rather get my dick sucked by some white girl named Sandra who is like `my daddy wouldn`t like me talking to no niggers” and then I kill her family and kidnap her.”

- “Sandra threw me off. Nasty witch I can pause the video and see her ugly.”
- “Why did you love Sandra? ‘Cause was blonde and deceptive.... A witch... not a baby like pam.”
- “I’m typing this just outside the home of Jon Benet Ramsey.”

25. On January 31, 2022, your affiant spoke to Sergeant Leon and advised after they learned of the threats posted by HARRIS, they initiated an emergency ping and learned HARRIS was in Boulder, Colorado.
26. On January 31, 2022, your affiant spoke with Boulder Police Sergeant Michael Heath. Sergeant Heath was notified the HARRIS was in Boulder, Colorado by his chain of command. Sergeant Heath learned through law enforcement databases that HARRIS had a new address located at 955 Broadway, Unit 306 N, Boulder, Colorado. This address was within the ping radius formerly initiated by the UCLA PD. Sergeant Heath alerted the University of Colorado Police Department of the threats posted that day. Sergeant Heath and a team member responded to HARRIS address. During that time the officers observed HARRIS briefly exit his residence yelling profanities and appearing to be highly agitated. Officer briefly lost visual sight of HARRIS. The police then heard more yelling coming from HARRIS apartment. In order to verify his whereabouts, they conducted another ping of his cellular phone which put his apartment in the ping radius. Sergeant Heath also attempted two phone calls to HARRIS phone with no answer. The police then attempted contact at the door. HARRIS spoke to officer through the door but refused to come out. The time was approximately 1:30am.
27. On February 1, 2022, your affiant was notified by FBI SA Bradley Mavis that Bonnie Veronese forwarded him an email sent by HARRIS at February 1, 2022, at 2:49:25am. The email contained the following:
- “u stupid caucasoids n kikes teach ACTUAL NAZIS LIKE HEIDEGGER AND KANT AND CARNAP (FUCK UCLA) ALL OF THOSE FUCKING PIECES OF SHIT WHEN THIS NIGGER SAYS HIS OWN PHILOSOPHY FUCKING GET SHOT THE FUCK UP U CAUCASOID-KIKE FAGGOTS no i didnt open the door for the popo so fuck who ever tried to tase me FUCK U the more u try to stop this message the more violence u gonna unleash”**
- The email also contained links to music and videos that appeared to be created by HARRIS on youtube.com, soundcloud.com, Apple Music, Amazon Music, and bitchute.com. HARRIS used a variety of account names, such as Dr. Matthew C. Harris, and DrMatthewHarris. The videos depicted HARRIS speaking, playing instruments, and describing plans to harm others. The videos also played footage from a mass shooting in Las Vegas, Nevada, and from the movie Zero Day, which depicts a movie version of the surveillance cameras at the Columbine school shooting.
28. On February 1, 2022, at approximately 11:07pm, after receiving communications from Boulder Police Department (“BPD”) SWAT, HARRIS voluntarily exited his apartment and was taken into custody on state PC charges of harassment.

29. Based on the above captioned information, it is requested that a warrant be issued for Matthew Christopher Harris for violation of Title 18, United States Code, Section 875(c).

s/ Stephanie Benitez
Stephanie Benitez, Special Agent
FBI

Subscribed and sworn to before me this first day of February, 2022.



HON. S. KATO CREWS
U.S. MAGISTRATE JUDGE
DISTRICT OF COLORADO

Affidavit reviewed and submitted by Julia Martinez, Assistant United States Attorney.