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10 **UNITED STATES DISTRICT COURT**
11 **CENTRAL DISTRICT OF CALIFORNIA**

12 FIONA HARVEY,
13 Plaintiff,
14 v.
15 NETFLIX, INC., and NETFLIX
16 WORLDWIDE ENTERTAINMENT,
17 LLC,
18 Defendants.

Case No. 2:24-cv-04744-RGK-AJR

**DECLARATION OF RICHARD GADD
IN SUPPORT OF DEFENDANTS'
SPECIAL MOTION TO STRIKE**

Date: September 3, 2024
Time: 9:00 a.m.
Place: Courtroom 850

Hon. R. Gary Klausner

**REDACTED VERSION OF
DOCUMENT PROPOSED TO BE
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DECLARATION OF RICHARD GADD

I, Richard Gadd, declare as follows:

I. BACKGROUND AND CAREER

1. I am a comedian, writer, and actor. I created, wrote, and starred in the Netflix series *Baby Reindeer* (the “Series”). I have personal knowledge of the facts set forth below and, if called as a witness, could and would testify competently thereto. I submit this declaration in support of defendants Netflix, Inc., and Netflix Worldwide Entertainment, LLC’s special motion to strike.

2. I have written and starred in several original theatre shows, including *Cheese and Crack Whores*, *Breaking Gadd*, and *Waiting for Gaddot*, which all debuted at the Edinburgh Fringe Festival from 2013–2015 and went on to have successful runs at London’s Soho Theatre. The Edinburgh Fringe Festival is one of the largest performing arts festivals in the world. It occurs annually in Edinburgh, Scotland and showcases artists of every genre of live performance.

3. In 2016, I wrote and starred in *Monkey See Monkey Do*, which won the Edinburgh Comedy Award for Best Comedy Show. *Monkey See Monkey Do* went on to have several sell-out runs at Soho Theatre, toured the United Kingdom and Europe, and was broadcast on Comedy Central in 2017. *Monkey See Monkey Do* touched on various themes, including, in particular, my own experience of sexual abuse and my struggles with sexual identity. My character spends much of the show running on a treadmill whilst being chased by a gorilla, training for the “Man’s Man Final,” a competition of one’s ability to complete ultra “manly” tasks. The gorilla represented how my brain had become lost to base primal emotions of fear and anger. The competition was meant to represent my struggle to regain my masculinity and my sense of self after I was sexually assaulted. *Monkey See Monkey Do* was a fictionalized account of real experiences in my life.

1 4. I also wrote and starred in the theatre production of *Baby Reindeer*,
2 which premiered at the 2019 Edinburgh Fringe Festival and won The Scotsman
3 Fringe First Award for New Writing and a Stage Award for Acting Excellence. Like
4 the Series, the show centered around an encounter with a stalker named Martha, and
5 addressed stalking, sexual assault, obsession, self-delusion, self-destruction, and
6 self-discovery.

7 5. I used real trauma as the basis for *Monkey See Monkey Do* and *Baby*
8 *Reindeer*, while creating characters, scenes, dialogue and dramatic devices to
9 support the fictionalized story. In other words, although these stage productions
10 were emotionally true and based on real events in my life, they dramatized people,
11 places, things, and events to tell a story.

12 **II. BABY REINDEER SERIES**

13 6. The Series, which was released on Netflix on April 11, 2024, is based
14 on aspects of the *Baby Reindeer* stage production.

15 7. The Series reprises characters, scenes, and dialogue from the theatre
16 version of *Baby Reindeer* and is a continuation of my exploration of sexual abuse,
17 manipulation, exploitation, obsession, sexual identity, self-loathing, self-
18 destruction, and self-discovery.

19 8. My personal struggles with my sexual identity, and experiences with
20 sexual abuse, harassment, and stalking, inspired me to write and star in the theatre
21 version of *Baby Reindeer*, and subsequently, the Series.

22 9. The Series is a dramatic work. It is not a documentary or an attempt at
23 realism. While the Series is based on my life and real-life events and is, at its core,
24 emotionally true, it is not a beat-by-beat recounting of the events and emotions I
25 experienced as they transpired. It is fictionalized, and is not intended to portray
26 actual facts.

1 10. While the Series is my emotionally true story as I recall and recount, it
2 is not intended to depict any real persons. Instead, I created fictionalized characters,
3 including Martha and Donny, which were foils to aid my exploration of my own
4 experiences and trauma. I intentionally used characters that did not share the actual
5 names of any persons from my life and wrote fictionalized dialogue and scenes.
6 Each of the characters from the Series has some imagined personality traits and
7 events that I specifically selected to make them useful as dramatic devices.

8 11. I used my experiences to craft the Martha character specifically to both
9 feed into Donny’s desperate need for attention and self-esteem issues and challenge
10 him in ways that make him confront his past abuse and its effects on him.

11 12. The Donny character is intended to be both a pitiable protagonist and,
12 at times, his own antagonist. Donny is also meant to provide a point of comparison
13 for Martha, and when the Series concludes, my hope was that the audience would
14 recognize that neither of them was truly the aggressor nor the victim. To further
15 reaffirm for the audience how those two characters are more alike than different, I
16 chose to end the Series with Donny sitting at a pub crying and the bartender giving
17 him a drink for free—precisely how Donny first meets Martha.

18 13. The Series is not a documentary representing literally true details and
19 imagery. It is a fictionalized retelling of my emotional journey through several
20 extremely traumatic real experiences. It is an expression of my views on stalking,
21 harassment, and sexual abuse told through the lens of my own experiences,
22 emotions, and self-reflections. I did not write the Series as a representation of actual
23 facts about any real person, including Fiona Harvey (“Harvey”). Harvey is never
24 mentioned in the Series.

25 **III. REAL-LIFE EXPERIENCES WITH FIONA HARVEY**

26 14. In 2014, I met Harvey at the pub where I worked at the time, the Hawley
27 Arms. I noticed that Harvey looked distressed and offered her a cup of tea on the
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1 house. On noticing each other’s accents, we engaged in what I took at that time to
2 be a friendly conversation, and discussed our common Scottish heritage.

3 15. Following that first meeting, Harvey subsequently stalked and harassed
4 me throughout 2014–2017. She frequently appeared at the pub. It quickly became
5 clear that she had memorised my shift pattern by hanging around the pub constantly.
6 She would then arrive just before my shift started on most days I was working and
7 sit at the end of the bar. She would also call the pub constantly on days when I was
8 not working to check if I was in. This went on for a very long period of time.
9 Sometimes she would stay for my entire shift, other times she would stay a few
10 hours. Sometimes she would just say something and abruptly leave.

11 16. Harvey’s behaviour quickly grew concerning for me. What started out
12 as someone sitting at the end of the bar and chatting most days, turned into her
13 directly impacting my ability to work, interjecting as I tried to serve tables, and
14 talking to most customers I served at the bar. She would often try to engage with
15 me by repeatedly trying to make jokes or “banter”. She would tell customers of the
16 pub that I was a comedian and sometimes adopt smutty innuendos to try and
17 embarrass me in front of staff. At first, I engaged with Harvey and her jokes—
18 viewing her as harmless—but it soon became exhausting, and I quickly grew
19 frustrated at her continual and unrelenting presence in my work life.

20 17. When Harvey was around, I had my guard up. There was a particularly
21 intense period of time when Harvey often attempted to touch me in inappropriate
22 (and sometimes sexual) ways. Harvey pinched and touched various parts of my
23 body, including my bum, and was generally very “handsy” towards me. The
24 attention was unwelcome and I found myself constantly trying to dodge Harvey’s
25 advances and unwanted physical contact while serving tables. I did ask Harvey to
26 leave me alone and to refrain from making advances towards me on several
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1 occasions; however, she ignored my requests and, as with her wider behaviour, she
2 was persistent and relentless.

3 18. Around March 2015, Harvey became increasingly hostile towards me
4 and others at the Hawley Arms. Matters escalated when I confronted Harvey in the
5 pub for falsely telling one of the regulars that we had sex, which she took badly.

6 19. On one occasion, Harvey mentioned to a customer at the bar a bad
7 review about me which she had seen online. I retorted by referring to news coverage
8 I had seen regarding Harvey's harassment of former Member of Parliament Jimmy
9 Wray and his wife Laura Wray. She briefly left the pub. When she re-entered, I was
10 sitting on a wooden chair in the corner to the right of the bar, crouched down by the
11 condiments cupboard, marring up the ketchups. Harvey came behind the bar to
12 where I was standing and shoved me in the back of my neck. I turned to find her
13 chastising me whilst pointing in my face. I remember that she referred to the
14 comedian Frankie Boyle's "mouth" having "got him into trouble" and she said that
15 my "mouth would get me into trouble too." She was furious and I found her
16 demeanour intimidating. I remember quickly apologising out of fear she was going
17 to hit me, as well as embarrassment at the fact a number of customers nearby were
18 looking over. She subsequently stormed out of the pub and repeated that my mouth
19 was going to get me into trouble as she left. The interaction was threatening, but I
20 was also embarrassed and angry that she had affronted me in such a physical and
21 public manner.

22 20. As matters escalated, Harvey's visits to the pub became increasingly
23 intense. At times I would hide in the basement or on a balcony in the hope that she
24 would grow bored and leave the pub. I was scared of Harvey and what she might be
25 capable of, particularly having seen the articles about her behaviour towards the
26 Wrays online. A lot of the staff were intimidated by her too and tried to adopt
27 different measures to get her to leave me alone so as to not escalate things further.
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1 For example, staff would tell her that I was not working so she would leave or
2 pretend that I had left the Hawley Arms. Nothing deterred her, and I remember long
3 shifts where I would sit out on the balcony or in the basement for hours waiting for
4 her to leave.

5 21. Harvey sometimes waited outside the pub for me to finish work. She
6 also followed me around town, sometimes very close to where I live, and she
7 attended many of my comedy and theatre performances. Often when I posted about
8 a performance online, usually on Twitter, Harvey would then turn up and
9 occasionally be disruptive. On one occasion, I was appearing in a show at Aces and
10 Eights in London in July 2016 when, before the show started, the producer spotted
11 Harvey in the audience. The producer subsequently went around the audience and
12 told everyone other than Harvey that we would be pretending the show had been
13 cancelled but that they could return 10 minutes later, just to get Harvey to leave. I
14 was then catching some fresh air when, on leaving the venue, Harvey confronted me
15 about cancelling the show. Another member of the producing team had to stand
16 between me and Harvey, who was becoming increasingly animated towards me. In
17 addition, I have always had to put extensive measures in place to stop Harvey from
18 attending my shows including at venues like the Soho Theatre and the Bush Theatre,
19 as well as involving producing partners Berk's Nest and Francesca Moody
20 Productions to help manage the situation.

21 22. Around July 2014, Harvey obtained my email address from my
22 personal website, which at the time included my contact details to facilitate enquiries
23 and bookings for comedy performances. Harvey emailed me relentlessly throughout
24 all hours of the day and night. She would sometimes send emails at 2 a.m. or 4 a.m.,
25 and at times she would send multiple emails in a single day. I never engaged with,
26 responded to, or referred to Harvey's emails because I feared it would only make
27 matters worse if she knew for certain that I had been receiving them.

1 23. Harvey sent me thousands of emails, hundreds of voicemails, and a
2 number of handwritten letters. These communications often included sexually
3 explicit, violent, and derogatory content, hateful speech, and threats. The emails and
4 voicemails attached to this declaration represent just a fraction of those I received
5 from Harvey. Most of the emails referenced in this declaration were provided to the
6 police. Below, I provide some examples of the types of emails I received from
7 Harvey.

8 24. Harvey regularly monitored my social media and sent me emails
9 discussing photos posted on my Twitter account. On January 29, 2015, Harvey sent
10 me an email with the subject line “yummy mummy,” which stated “I see your mum
11 is on twitter . . . I looked up yours to see what was going on in your head and you
12 retweeted her.” Attached hereto as **Exhibit 1** is a true and correct copy of the
13 January 29, 2015 email from Harvey. On September 17, 2016, Harvey emailed me
14 “I love the photo of you sleeping on twitter.” Attached hereto as **Exhibit 2** is a true
15 and correct copy of the September 17, 2016 email from Harvey.

16 25. Harvey’s emails frequently contained hateful speech and derogatory
17 racist and homophobic language. For example, Harvey told me “[y]ou look gay in
18 one of those online photos” and stated “I would kill a Muslim if they attacked you,”
19 “[I] hate [M]uslims . . . noise noise noise act like animals,” and “[a]ll Moslems [sic]
20 should be tied up by the balls to hang from trees.” Attached hereto as **Exhibits 3–5**
21 are true and correct copies of the June 13, 2016; July 15, 2016; and July 17, 2015
22 emails from Harvey. In another email, Harvey admitted “[n]o wonder I’m a racist.”
23 Attached hereto as **Exhibit 6** is a true and correct copy of the August 2, 2016 email
24 from Harvey. On May 29, 2016, Harvey stated “I can’t stand this gay business . . .
25 It makes me squirm actually . . . [y]uk yuk.” Attached hereto as **Exhibit 7** is a true
26 and correct copy of the May 29, 2016 email from Harvey.
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1 26. Harvey frequently made personal attacks and threatened me in her
2 emails. On January 25, 2015, Harvey sent me a lengthy email acknowledging that
3 she had been banned from the Hawley Arms, the pub where I was employed, calling
4 me “naive [sic] ugly stupid and badly educated,” insulting and threatening several
5 of my colleagues at the pub, and threatening me with litigation. Harvey also
6 threatened me to “move back to [G]lasgow,” a “[C]atholic mafia kind of place full
7 of paedos [sic] and gangs and liars and crimbos . . . That might suit you just fine”
8 and stated she had “considerable” contacts in “[e]very] walk of life . . . all very angry
9 with you,” including “a number of [law] firms.” While this email stated that Harvey
10 was “blocking [my] email account” and finished speaking to me, she continued to
11 send hundreds of emails after this. Attached hereto as **Exhibit 8** is a true and correct
12 copy of the January 25, 2015 email from Harvey.

13 27. On January 25, 2016, Harvey mailed me a multi-page handwritten
14 letter, which was barely legible. The letter claimed that Harvey did not read emails
15 because she was “allergic to emails,” called me a “prick” and demanded that I call
16 her because she was “fed up with the fanning about.” Attached hereto as **Exhibit**
17 **9** is a true and correct copy of the January 25, 2016 letter from Harvey.

18 28. Harvey threatened me that I had a “very big enemy in the acting world.
19 [I’m] not telling you who that is but they are saying you are all image image and
20 apain [sic] in the butt . . . frankly [I’m] not surprised . . . narcissists are like that.”
21 Attached hereto as **Exhibit 10** is a true and correct copy of the January 30, 2015
22 email from Harvey.

23 29. On September 13, 2016, Harvey also threatened that I needed to “shut
24 [my] ignorant little failed actor mouth” because I was “finished.” Harvey also made
25 derogatory remarks about my sexuality in this email, stating she was glad we had
26 never dated because “you are gay and I’d have aids.” Attached hereto as **Exhibit 11**
27 is a true and correct copy of the September 13, 2016 email from Harvey.
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1 30. Harvey frequently made threats of physical violence in her emails. In
2 one email, for example, Harvey indicated she was heading to the gun shop to “buy[]
3 guns to shoot each other” and that “[i]f we get rid of [K]han everyone will sleep
4 easy.” This email referred to Sadiq Khan, a Labour Party politician who had recently
5 been elected as the Mayor of London, and was the first Muslim to hold that position.
6 Attached hereto as **Exhibit 12** is a true and correct copy of the May 4, 2016 email
7 from Harvey. Attached hereto as **Exhibit 13** is a true and correct copy of an August
8 29, 2016 email from Harvey.

9 31. Harvey also sent me emails discussing her plans to run for political
10 office to displace Labour Party members, including claiming that she was on “four
11 shortlists” for seats in Parliament. Attached hereto as **Exhibits 14–16** are true and
12 correct copies of emails from Harvey sent February 1, 2015; February 12, 2015; and
13 August 15, 2016.

14 32. Harvey also sent me emails describing her troubling interactions with
15 others. For instance, on November 18, 2014, she wrote me that “[b]y the way piers
16 gas [sic] a great ass pinched if [sic] last night. Great ass.” Attached hereto as
17 **Exhibit 17** is a true and correct copy of the November 18, 2014 email from Harvey.

18 33. Harvey also regularly propositioned me with lewd and explicit
19 language. For example, Harvey emailed me “I want to suck your cock all day have
20 u shag me and have a stab at this” and threatened me with an “ultimatum,”
21 demanding “sex three times at night and twice in the morning” and stated “I just
22 want to give u loads and loads of blow jobs to make you sleep.” Attached hereto as
23 **Exhibits 18–20** are true and correct copies of the September 11, 2016; November,
24 11, 2014; and May 11, 2016 emails from Harvey.

25 34. In another email, Harvey made sexual advances toward me while also
26 making xenophobic remarks, stating “I can’t stand all the bloody foreigners in the
27 streets this time of year . . . I did so much want to . . . let u fuck my brains [o]ut.”
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1 Attached hereto as **Exhibit 21** is a true and correct copy of the July 24, 2016 email
2 from Harvey.

3 35. Harvey sent numerous emails discussing my body. For example, on
4 January 18, 2015, she wrote that “obviiusly [sic] miss your luvly [sic] bum” and that
5 it is “the luvliets [sic] bum”. On May 8, 2015, Harvey emailed me that “you still
6 have a cute ass though ... I have been thinking a lot about your ass ... its your best
7 bit.” On August 24, 2015, Harvey emailed that “you do have a great ass and if u
8 invite sone [sic] gay guy back to your flat hell [sic] think it’s Xmas.” On July 21,
9 2016, Harvey sent me multiple emails, including “My sweetness I do love your hair
10 and your bum [sic]” and “Oh Richard [G]add your bum. Your bum”. On September
11 2, 2016, Harvey wrote, among other things, “You’ve got the best bum I’ve ever seen
12” On September 20, 2016, she wrote “Your bum incidentally is the best bum I’ve
13 ever seen on a guy ever and I’ve seen some nice bums ... Cracking ass you have.”

14 Attached hereto as **Exhibits 22–27** are a true and correct copies of the January 18,
15 2015; May 8, 2015; August 24, 2016; July 21, 2016; September 2, 2016; and
16 September 20, 2016 emails from Harvey.

17 36. Harvey also sent me emails with photos of herself and her underwear.
18 On April 20, 2016, Harvey sent me a photo of her student ID, with an email stating
19 “Th[i]s me at twenty five.” On April 21, 2016, Harvey sent me a photo of her
20 underwear. On May 11, 2016, Harvey sent me a photo of herself with an email
21 stating “C I was sober before I went out.” Attached hereto as **Exhibits 28–30** are a
22 true and correct copies of the April 20, 2016; April 21, 2016; and May 11, 2016
23 emails from Harvey.

24 37. Harvey frequently described her menstrual cycle, breasts, pubic hair,
25 and masturbation habits in graphic detail. For example, on November 18 and 19,
26 2014, Harvey emailed me about her menstrual cycle, stating “I’m clotting badly. I
27 think we can safely say I’m not menopausal babe” and “[t]his blood loss is excessive
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1 sounds gruesome but I should have kept it all in a jar to show the dr.” On December
2 28, 2014, Harvey emailed me “hi my clitoris dropped off . . . too much masturbation
3 . . . had a lovely [sic] xmas day just pleasing myself.” On April 27, 2016, Harvey
4 sent me an email stating that she was “[f]ed up with the highlight of my day being
5 masturbating. I mean I like masturbating” and on May 6, 2016, Harvey emailed me
6 that she had “masturbated and looked at photos of cute babies.” On May 13, 2016,
7 Harvey sent another graphic email about her menstruation cycle, stating “heavy
8 bleeding started Monday . . . My tits and tummy were looking six months pregnant
9 last week,” and on June 10, 2016, Harvey emailed me again about menstruating:
10 “Worst feeling when sanitary towels cha[fe] v skin . . . Have become allergic to
11 tampons.” On September 9, 2016, Harvey sent lengthy, incoherent email stating
12 “I’ve got to get the beef off the tits and belly . . . I’ve piled it on cos I used to walk
13 at night but my drug dealing neighbor next door keeps getting busted . . . I’d kick
14 out at him physically in a minute but I can’t risk an assault conviction . . . In fact
15 [I’d] fg kill the b . . . I do have great nipples though I have to say.” Attached hereto
16 as **Exhibits 31–38** are true and correct copies of emails from Harvey sent on
17 November 18, 2014; November 19, 2014; December 28, 2014; April 27, 2016; May
18 6, 2016; May 13, 2016; June 10, 2016; and September 9, 2016.

19 38. Harvey’s emails and social media posts demonstrated that she was
20 regularly attending my performances. For instance, on November 18, 2015, Harvey
21 sent me an email with the subject “your show” and wrote “i [sic] liked the bit where
22 ben was kicking your arse cos [sic] the back view of your arse was perfect . . . that’s
23 your best bit . . .” On August 7, 2016, Harvey sent me an email that my “show is
24 very funny” (and that she “[w]as gonna have a lie in but needed to masturbate.
25 Where’s u and your cock when I need it.”). On August 28, 2016, Harvey sent me
26 an email speculating “I think you were assaulted and I’ll tell you why” and including
27 details she could have only observed from attending one of my performances.
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1 Attached hereto as **Exhibits 39–41** are true and correct copies of the emails from
2 Harvey dated November 18, 2015; August 7, 2016; and August 28, 2016.

3 39. On June 22, 2017, Harvey publicly tweeted about my play *Monkey See*
4 *Monkey Do*. Harvey stated that she “wouldn’t believe a worfd [sic]” that came out
5 of my mouth about the sexual abuse I suffered because she had “bitter expertiencves
6 [sic]” with me. Attached hereto as **Exhibit 42** is a true and correct copy of Harvey’s
7 June 22, 2017 tweets.

8 40. After years of enduring Harvey’s stalking, harassment, abuse and
9 threats, I went to the police in February 2016. The police warned me that “police
10 intervention might exacerbate the situation, and lead to further prolonged contact
11 from her,” and recommended that they refer Harvey “to the appropriate mental
12 health/community intervention team for support in this case,” rather than issue a
13 First Instance Harassment Warning Letter. Attached hereto as **Exhibit 43** is a true
14 and correct copy of the February 10, 2016 email thread between me and the police.
15 At this time, the harassment had become less frequent, so I agreed with the police
16 officer’s recommendation.

17 41. However, in the following months, I continued to receive hundreds of
18 emails from Harvey, and in May 2016, I reached back out to the police to express
19 my concern and reopen the harassment case. I attached an example of one of
20 Harvey’s emails, which stated “Masturbate that should send u to sleep . . . I’m a
21 wreck today. I’ve hit itchy pubic hair too . . . It’s a rash . . . I’ve wanted more sex in
22 my forties had more sex and masturbated more than in my twenties and thirties.” In
23 response, the police recommended that I block Harvey’s email address for the time
24 being and advised me to inform the Hawley Arms that Harvey had been in contact
25 with me again. Due to Harvey’s frequent threatening visits to the pub, a First
26 Instance Harassment Warning Letter had been issued against her listing the pub as
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1 the victim at the time. Attached hereto as **Exhibit 44** is a true and correct copy of
2 the May 6, 2016 email thread between me and the police.

3 42. In September 2016, Harvey obtained my telephone number. This
4 happened at a point when I was away on holiday in Croatia and had switched on the
5 out-of-office function on my email account. The out-of-office reply contained my
6 phone number, and I had not thought it through that, if Harvey emailed me during
7 this period, she would receive an automatic reply which included my telephone
8 number in the footer of the email.

9 43. Once she obtained my phone number, Harvey began calling me and
10 leaving hundreds of voicemails. I do not have a record of all the voicemails, but I
11 have many hours of voicemails from Harvey that I recorded and still have. The
12 voicemails included graphic details about Harvey's sexual exploits, stories about
13 catching sexually transmitted diseases, threats to me, my family, my coworkers, and
14 other victims of Harvey's stalking and harassment.

15 44. Over just a few days in September 2016, Harvey left me hours of
16 voicemails. As soon as my voicemail box cut her off, she would immediately call
17 back and leave another voicemail. During this string of voicemails, Harvey
18 profusely insulted me, calling me a "bipolar alcoholic," and claiming the "whole of
19 Glasgow" hated me and had an "axe to grind" with me. She also made threats against
20 my family, stating "I know your family," and that they have "enemies." She claimed
21 that she had a "file" on me and that a lot of people "know about me," and threatened
22 to sue me and shut down the Hawley Arms, stating that she had the power to do so
23 ("We can do that."). Harvey also threatened me not to tell the police about her
24 voicemails and emails and said she had "access" to the police files. She claimed that
25 undercover police officers, drug dealers, lawyers, and ex-lawyers were all after me
26 and that the comedy industry hated my guts. Harvey threatened me with physical
27 violence, stating she would "smash [my] balls in," and made violent threats to my
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1 coworker, stating that she “is a cock sucking little whore with no tits . . . she’s a cock
2 sucking Spanish whore who shouldn’t even be in the country” and threatening to
3 take a “heap of guys that would have actually gone right through” her, who were
4 “professional guys” that would have “hit” her and threatened to have her deported.
5 She also referenced “petering [someone] up the ass” and “peeling off their toenails”
6 and repeated “if I want you dead, you are fucking dead” multiple times in these
7 messages, and stated “if I hadn’t been a lawyer, I would have smashed somebody’s
8 face in.” Attached hereto as **Exhibit 45** is a true and correct copy of the series of
9 voicemails left by Harvey on September 12 and 13, 2016.

10 45. On September 17, 2016, I emailed the police, informing them that
11 Harvey again left me hours of voicemails. I also prepared a document outlining the
12 “particularly threatening/aggressive moments” from the voicemails for the police. I
13 then coordinated with the police to hand off an SD card with the voicemail
14 recordings on September 19, 2016. Attached hereto as **Exhibit 46** is a true and
15 correct copy of the September 17–19, 2016 email thread between me and the police.

16 46. On September 19, 2016, Harvey left me another string of voicemails,
17 during which she claimed to have information on my family and once again warned
18 me not to speak to the police, stating she was “so angry at [me] shouting [my] mouth
19 off.” In this voicemail, Harvey claimed to know “100,000 lawyers” and threatened
20 me “[y]ou’re not as bright as you think you are . . . I’m 25,000 steps ahead of you.”
21 She stated that she would create “World War Three over a sketch,” referencing my
22 comedy shows. She also went into explicit detail about her sex life and again
23 insulted the same coworker, claiming to have reported her to immigration law and
24 threatening that she would stop her from obtaining employment anywhere in the
25 country. Harvey also admitted “I’m a racist,” and that she wanted to “boot” all
26 Pakistanis “out of the country.” Attached hereto as **Exhibit 47** is a true and correct
27 copy of the series of voicemails left by Harvey on September 19, 2016.
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1 47. On September 21, 2016, I followed up with the police and sent another
2 email attaching 30 examples of emails from Harvey ranging from 2014–2016. In
3 addition to the emails previously referenced, I also attached emails in which Harvey
4 threateningly stated “your place of work was allegedly raided by several agencies
5 last [S]aturday? [A] little birdie told me” and “Just for the record I have multiple
6 orgasms cos I train my men up sexually” I also included examples of Harvey’s
7 hate speech, including an email stating “from now on do call folk retards
8 partic[ularly] if in the labour party if stark raving homos or castholics [sic] . . . im
9 right behind you . . . i just hate [C]atholics poofers etc . . . and im a racist . . . apart
10 from that i’m a really sweet wee girlie good at sedx [sic].” In other emails, Harvey
11 stated “if I get one more peep . . . [o]ut of so called feminist [] gay or ethnic minority
12 folk ill blow my top . . . Oh I’m gay I’m gay . . . Oh I’m black in [sic] black . . . Oh
13 ima [sic] Muslim poor me . . . Oh I’m trying to be a pretend feminist poor me,” and
14 “London very dangerous all these Somalians . . . I told u they were nothing but
15 trouble.” Attached hereto as **Exhibit 48** is a true and correct copy of my September
16 21, 2016 email to the police with attachments.

17 48. On September 21, 2016, Harvey left me another string of lengthy
18 voicemails, which contained violently racist rhetoric for several minutes, stating “I
19 want all these foreigners out . . . far too many foreigners coming in . . . if that sounds
20 racist, too bad.” During this voicemail, Harvey references that she has been calling
21 me with “No Caller ID,” thereby revealing that she knew I had blocked her phone
22 number but persisted in calling me nonetheless. Harvey admitted to sending me her
23 underwear, and states “I have had mad stalkers too,” in a seeming admission that she
24 has been stalking me. She once again went into detail about her sex life, her pubic
25 hair, and masturbation, and warned me to get “checked for sexual disease.” Attached
26 hereto as **Exhibit 49** is a true and correct copy of the series of voicemails left by
27 Harvey on September 21, 2016.
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1 49. On September 27, 2016, Harvey left me another threatening voicemail,
2 stating “I cannot express how angry I am at the way you set me up . . . I know about
3 you and your family. Stay in fucking Croatia. And that is really my final word. I
4 bloody mean it this time . . . I think you’ve got psychiatric problems, but I think it’s
5 made up and caused by drugs . . . Fuck off. Yeah. Absolutely. Fuck off.” She also
6 claimed “I have information you don’t need to know, I know, about you and your
7 family.” Attached hereto as **Exhibit 50** is a true and correct copy of the voicemail
8 left by Harvey on September 27, 2016.

9 50. I emailed the police again with a list of the most “intense parts of the
10 voicemails” and coordinated with the police to drop off a “pendrive with all the
11 information regarding Fiona Harvey on it,” including the voicemail recordings.
12 Attached hereto as **Exhibit 51** is a true and correct copy of my September 30, 2016
13 email to the police.

14 51. By this time, Harvey’s harassment had been plaguing my life for over
15 two years. I was fearful. I continually changed my daily routines to try to avoid her
16 and would not spend time in parts of London I knew Harvey frequented (indeed I
17 am still apprehensive about going to certain parts of London because of her). I could
18 not sleep. When I did sleep, I would wake up in the night sweating. I spent countless
19 weekends noting down Harvey’s threatening voicemails. I was panicked and
20 paranoid. I was terrified about getting on tubes and buses for fear of seeing her. I
21 genuinely was worried that she might harm me or my parents—my parents
22 especially. In short, her actions took an extensive toll on my physical and especially
23 my mental well-being.

24 52. The cumulative effect of all of Harvey’s actions was enormous. It was
25 exhausting and extremely upsetting to deal with her constant personal interactions
26 in the Hawley Arms, her following me around London including near where I lived
27 and her relentless and deeply unpleasant communications. As I explain above, I was
28

1 frightened about what she might be capable of, given the progressive hostility and
2 escalation in her communications, and volume of her conduct.

3 53. After many months of speaking to the Police, I eventually obtained a
4 First Instance Harassment Warning against Harvey. After I obtained that Warning,
5 the emails and voicemails stopped.

6 54. But her behaviour did not stop completely. For example, Harvey sent
7 me another handwritten letter along with some underpants. The letter stated “you’ve
8 not unblocked your email . . . so have not checked my emails. Here are some lucky
9 [under]pants.” The outside of the envelope claimed, “if you unblocked your email
10 you would see I’ve sent you good wishes.” Attached hereto as **Exhibit 52** is a true
11 and correct copy of the August 22, 2017 letter from Harvey.

12 55. Throughout my in-person interactions with Harvey, I asked her on a
13 number of occasions to stop engaging in unwanted behaviour towards me. In
14 particular, I asked Harvey to stop attending my gigs, to refrain from making
15 advances towards me and to stop speaking to customers about me, but it was like
16 trying to reason with someone who knew no bounds. I did not change my number
17 because I strongly felt that it was up to her to stop calling and that it was morally
18 wrong of me to change my number based on someone harassing me. I felt it was up
19 to her to adjust her behaviour around me, as the instigator and aggressor in the
20 situation. I did download software and apps which I thought should block calls from
21 unknown numbers, but none of these worked.

22 56. Overall, it was an incredibly stressful and worrying time, with a
23 sustained period of relentless behaviour taking place over several years. It is
24 impossible to be exhaustive in setting out all of Harvey’s conduct, as there were so
25 many instances of unwelcome personal interaction and attempts to engage, as well
26 as deeply troubling communication. However, the above provides a microcosm of
27 the sheer scale of her targeted harassment towards me.
28

1 **IV. KNOWLEDGE OF OTHER VICTIMS HARASSED BY HARVEY**

2 57. I am also aware that Harvey has stalked and harassed other individuals
3 and had violent fantasies about others.

4 58. For example, on November 18, 2014, Harvey stated “I really wish my
5 Fg [sic] sister would drop dead . . . I’ll have her Fg [sic] two bit fat sack lawyer
6 struck off. Not [a]n easy thing to do in [S]cotland.” Attached hereto as **Exhibit 53**
7 is a true and correct copy of the November 18, 2014 email from Harvey.

8 59. On December 11, 2014, Harvey sent me an email that stated “sister and
9 hwer [sic] lawyer still being pains . . . ill [sic] need to disappear them[.]” Attached
10 hereto as **Exhibit 54** is a true and correct copy of the December 11, 2014 email from
11 Harvey.

12 60. On March 3, 2015, Harvey sent me an email threatening to “shut down”
13 an estate-planning attorney’s firm because “she has []pushed me too far.” Attached
14 hereto as **Exhibit 55** is a true and correct copy of the March 3, 2015 email from
15 Harvey.

16 61. Harvey also sent me multiple emails detailing her harassment Jimmy
17 and Laura Wray. On February 1, 2015, Harvey stated that she had been “done over
18 by the [W]rays” and she and others allegedly “done over” had “hired private
19 detectives in our law firms hence I was called a stalker.” Harvey also detailed
20 alleged blackmail she had against Labour Party members. Attached hereto as
21 **Exhibit 56** is a true and correct copy of the February 1, 2015 email from Harvey.

22 62. On February 2, 2015, Harvey sent me an email stating “it was me who
23 called police to [W]ray and [W]alker . . . I had no choice.” Attached hereto as
24 **Exhibit 57** is a true and correct copy of the February 2, 2015 email from Harvey.

25 63. I later became aware that the Wrays had obtained some form of
26 restraining order against Harvey.
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1 64. Harvey also routinely referenced Jimmy and Laura Wray in her
2 voicemails to me. In the September 12–13, 2016 series of voicemails, Harvey
3 admitted that she told Jimmy Wray she would “wring [his] bloody neck” and that he
4 had reported this as a “death threat.” She also stated that she would finish her book
5 on the Labour Party “when they shoot about five more Labour [Members of
6 Parliament],” This was particularly concerning to me because a few months prior a
7 Labour MP, Jo Cox was fatally shot. (See **Exhibit 45**). I feared for my life around
8 Harvey at this point, with Harvey acutely aware that I was “shit scared” of her (See
9 **Exhibit 26**).

10 65. In addition to the Wrays, Harvey also made threatening and violent
11 comments about ██████████, a Conservative councilor, in her voicemails and
12 emails claiming ██████████ called her frequently and that he owed her money. Based
13 on the voicemails and emails I received from Harvey, I believe that she also stalked
14 and harassed ██████████ Attached hereto as **Exhibits 58–60** are true and correct
15 copies of June 9, 2016; June 11, 2016; and September 17, 2016 and emails from
16 Harvey.

17 **V. HARVEY COMES FORWARD**

18 66. Throughout the process of writing the *Baby Reindeer* play and the
19 Series, I intentionally did not refer to Harvey by name in any way.

20 67. When viewers began speculating about the real-life inspirations for
21 various characters, I urged them to stop. For example, attached hereto as **Exhibit**
22 **61** is a true and correct copy of a screenshot of my Instagram Story, dated April 23,
23 2024, in which I urged viewers to stop speculating. I never intended the Series to
24 identify any real person as Martha Scott, including Harvey. Martha Scott is not
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Fiona Harvey. Like all characters in the Series, Martha is a fictional character with fictional personality traits that are very different than Harvey's.

68. Harvey identified herself to the press as Martha after three or four other people previously had been falsely identified as Martha by members of the public.

69. I was surprised that Harvey appeared on *Piers Morgan Uncensored*. Though I have only watched certain segments, I understand she claimed that she was the inspiration for the Martha character, and that she never sent me thousands of emails nor left me any voicemails. She harassed and stalked me over several years, and since her interview, other individuals have contacted me through my agents and publicists and said they were also harassed by Harvey, but all were too scared of her to come forward.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on July 28, 2024 at London, United Kingdom.



Richard Gadd