

STATE OF LOUISIANA

SIXTEENTH JUDICIAL DISTRICT COURT

PARISH OF ST. MARY

STATE OF LOUISIANA

v.

CAROLINE NICOLE HARRIS

CASE NO. 2025-215897

DIVISION: 6

**EMERGENCY MOTION TO COMPEL DISCOVERY, TESTIMONY, AND
PRODUCTION OF COVERT AND CLASSIFIED SURVEILLANCE
RECORDS**

NOW INTO COURT, comes the undersigned, REVEREND DAVID EDWARD LUCITO, appearing as Next Friend for Defendant Caroline Nicole Harris. He files this motion under protest and duress to compel the truth from all parties who have actively concealed it or passively allowed its concealment.

MEMORANDUM IN SUPPORT

I. INTRODUCTION: PIERCING THE VEIL OF SECRECY

This motion seeks to compel evidence from a conspiracy of silence that is wide-ranging, involving not only the primary actors but a broad network of officials who were contacted and chose to ignore pleas for help, and even those who engaged in direct harassment and psychological operations against the defense.

II. ARGUMENT

A. Compelling Testimony from All Involved Parties is Essential.

To demonstrate a systemic pattern of non-response, active suppression, and bad-faith harassment, the defense must depose every link in the chain. The testimony of the following individuals is indispensable:

Core Actors: Taneisha Riggs (former counsel), current appointed counsel, Sgt. Jeffrey Green, and Army CID Redstone representatives.

Louisiana State Police Personnel: Master Trooper Holiday and Sgt. Chase Huval.

St. Mary Parish Sheriff's Office Personnel: The as-yet-unidentified Sheriff's Deputy who, in early June 2024 at approximately 1:00 AM, placed a harassing phone call from the Warden's office to the undersigned. During this call, the deputy mocked the defense by referencing "neuroweapons" and actively obstructed by falsely claiming no knowledge of Defendant Caroline Harris's whereabouts. The identity of this deputy can be ascertained through phone records and duty logs from the St. Mary Parish Law Enforcement Center for the specified date and time. This testimony is direct evidence of witness intimidation and psychological harassment originating from within the holding facility itself.

The Chain of Non-Response: Any official, agent, or representative from any local, state, or federal agency who was contacted by the undersigned from January 1, 2019, to the present regarding these matters.

B. Production of State and Federal Records is a Constitutional Imperative.

The complete, unredacted LSP Internal Affairs file IA-2300029 and all telecommunication and law enforcement duty logs are essential to identifying the full scope of the conspiracy and are exculpatory under Brady v. Maryland.

C. The Demand for Verbatim Surveillance Records and Classified Information Procedure.

We demand the verbatim surveillance transcripts established by the Max Lebow precedent and anticipate a "national security" objection. We formally request the Court proceed with lawful remedies:
In Camera Review: We demand an in camera review of any evidence withheld under a "classified" privilege.

Classified Information Procedures Act (CIPA): We demand that any relevant classified evidence be handled through CIPA procedures to ensure the Defendant's Sixth Amendment rights are not sacrificed for state secrecy.

III. CONCLUSION

The Court must compel testimony from the entire chain of command and correspondence. To deny this motion is to rule that a "classified" and coordinated injustice, including direct harassment by law enforcement, is permissible in this court.

WHEREFORE, the undersigned, as Next Friend, respectfully requests that this Court:

- GRANT this Second Amended Emergency Motion;
- ORDER the depositions of Taneisha Riggs, current appointed counsel, Sgt. Jeffrey Green, Master Trooper Holiday, Sgt. Chase Huval, and representatives from Army CID Redstone;
- ORDER the St. Mary Parish Sheriff's Office to produce all duty logs and phone records from early June 2024 sufficient to identify, and subsequently depose, the deputy who placed the harassing call from the Warden's office;
- ORDER the production of all state, federal, and telecommunication records as previously detailed, empowering the defense to depose any official identified therein who was contacted by the undersigned;
- FURTHER ORDER that any refusal to produce evidence based on a claim of "national security" shall trigger an immediate *in camera* review and the commencement of proceedings under the Classified Information Procedures Act (CIPA).

Respectfully submitted, under protest and duress,

REVEREND DAVID EDWARD LUCITO, Next Friend

3/4/2026

Reverend David
Edward Lucito
Next Friend