

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 NOTICE OF EVIDENCE SPOILIATION, DIGITAL INTIMIDATION, AND WITNESS ELIMINATION

NOW INTO COURT, comes REVEREND DAVID EDWARD LUCITO, appearing as Next Friend for Defendant Caroline Harris, to alert the Court to a campaign of active evidence destruction and to formally request the procedures necessary to adjudicate the classified matters at the heart of this spoliation.

I. SYSTEMIC SPOILIATION, TARGETED CENSORSHIP, AND DATA MANIPULATION

The undersigned has documented a persistent and undeniable three-part pattern of digital warfare, perpetrated by actors with remote access to his devices and influence over social media platforms. Removal of Original Evidence: Critical evidence files, originally compiled for a "homeland emergency affidavit," were discovered to have been removed from the undersigned's phone.

Re-introduction of Altered Files: Subsequently, files were added back to the undersigned's phone in an altered format. These altered files may contain malware, tracking beacons, or even encrypted communications, representing a flagrant attempt to tamper with evidence and potentially compromise the defense's digital security.

Targeted Censorship of Corroborating Evidence: The undersigned shared a public U.S. Marine Corps Instagram post visually depicting "Havana Syndrome" neuroweaponry. Shortly after, this post—directly related to the technology central to this case—was made to vanish from the platform, demonstrating coordinated censorship.

II. THE PATTERN OF WITNESS ELIMINATION

This spoliation occurs against the backdrop of the disappearances of key witnesses Max Lebow and Karen Melton Stewart, who both exposed the very surveillance apparatus at issue. The pattern is clear: those who possess or expose the evidence are targeted.

III. THE SPOILIATION'S TRUE MOTIVE: AVOIDING CLASSIFIED DISCLOSURE

IV. FORMAL REQUEST FOR CLASSIFIED INFORMATION PROCEDURE

Since the evidence being destroyed and manipulated is almost certainly classified, the defense formally requests the procedural remedies for handling such information:

In Camera Review: We demand an in camera review of any evidence or testimony related to this spoliation, including the original, removed files, and the altered files that were added back.

Classified Information Procedures Act (CIPA): We demand that the underlying classified programs, which are the motive for the spoliation, be examined through CIPA procedures.

V. RELIEF REQUESTED

Next Friend respectfully requests that this Court:
ORDER an immediate evidentiary hearing on this pattern of spoliation and data manipulation;
ISSUE an emergency preservation order and protective orders;
APPLY the spoliation inference, presuming the destroyed, censored, and altered evidence would have proven the Defendant's innocence;
TAKE JUDICIAL NOTICE of the disappearances as evidence of the reality and danger of the surveillance apparatus;
FURTHER ORDER that any claim of "national security" used to justify the non-production of evidence related to this spoliation 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

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