

STATE OF LOUISIANA

SIXTEENTH JUDICIAL DISTRICT COURT

PARISH OF ST. MARY

STATE OF LOUISIANA

v.

CAROLINE HARRIS

CASE NO.: 2025-215897

SECTION: 6

Ω - In Nomine Patris et Filii et Spiritus Sancti

MOTION FOR DISCOVERY OF EXCULPATORY EVIDENCE (BRADY MOTION)

NOW INTO COURT, through undersigned counsel, comes **Reverend David Lucito**, Next Friend of Defendant Caroline Harris, and respectfully moves this Honorable Court to ORDER the State to produce all exculpatory evidence in its possession, custody, or control, and to obtain and produce exculpatory evidence from federal and state agencies, pursuant to *Brady v. Maryland*, Louisiana Code of Criminal Procedure Article 718, and the Due Process Clause of the Fourteenth Amendment.

I. GROUNDS

This Motion is filed pursuant to:

- *Brady v. Maryland*, 373 U.S. 83 (1963)
- *Giglio v. United States*, 405 U.S. 150 (1972)
- *Kyles v. Whitley*, 514 U.S. 419 (1995)
- Louisiana Code of Criminal Procedure Article 718
- Due Process Clause of the Fourteenth Amendment

II. LEGAL STANDARD

A. Brady Obligation

Under *Brady v. Maryland* and its progeny, the State has a constitutional obligation to disclose to the defense all evidence that is:

1. **Favorable to the accused**, either because it is exculpatory or because it impeaches; and
2. **Material** to guilt or punishment

"Material" means:

> Evidence is material "if there is a reasonable probability that, had the evidence been disclosed to the defense, the result of the proceeding would have been different." *United States v. Bagley*, 473 U.S. 667, 682 (1985).

B. Scope of Brady Obligation

The State's obligation extends to:

- Evidence in possession of police
- Evidence in possession of prosecutor's office
- Evidence in possession of other governmental agencies acting in concert with State
- Evidence that State knows about or should know about through due diligence

The State cannot avoid Brady by:

- Claiming ignorance of evidence

- Failing to communicate between agencies
- Refusing to obtain evidence from federal partners

"The individual prosecutor has a duty to learn of any favorable evidence known to others acting on the government's behalf, including the police." *Kyles v. Whitley*, 514 U.S. at 437.

III. EXCULPATORY EVIDENCE CATEGORIES

Defendant identifies the following categories of exculpatory evidence that the State must produce:

CATEGORY 1: LOUISIANA STATE POLICE INTERNAL AFFAIRS FILE (IA-2300029)

Evidence Requested:

Complete, unredacted Louisiana State Police Internal Affairs investigation file IA-2300029, including:

- All investigative reports
- All witness interviews (especially SGT Green)
- All audio/video recordings
- All documentary evidence
- All communications between investigators
- All supervisory reviews
- Closing documentation and rationale for disposition

Why This Evidence Is Exculpatory:

This file documents:

1. Pattern of compelled conduct by LSP officers

- Officers reporting loss of volitional control
- Officers reporting external influence on behavior
- Officers reporting being "robotted"

2. Institutional knowledge of targeting

- LSP knew officers were being subjected to external control
- LSP investigated (then closed) the phenomenon
- LSP chose to "de-caption" rather than pursue

3. Establishes Defendant's Defense

- If LSP officers were compelled, Defendant's claim of compulsion is corroborated
- If LSP knew about the phenomenon, Defendant's reports are validated
- If LSP suppressed investigation, pattern of cover-up is established

Materiality:

If IA-2300029 shows:

- LSP officers experienced compelled conduct
- LSP investigated and confirmed external control
- LSP chose to suppress rather than investigate

Then there is a REASONABLE PROBABILITY the result would be different:

- Defendant's compulsion defense gains institutional corroboration
- Mens rea (criminal intent) is negated
- State's "mental illness" theory is undermined

This evidence is MATERIAL under Brady.

CATEGORY 2: FEDERAL AGENCY COMMUNICATIONS AND RECORDS

Evidence Requested:

All records of communications between Defendant and the following federal agencies:

A. National Security Agency (NSA)

- Defendant reports direct communication with NSA personnel
- Defendant reports NSA told her not to talk to police
- All records of:
 - Contact between Defendant and NSA
 - NSA operations in vicinity of Defendant
 - NSA surveillance of Defendant
 - NSA communications regarding Defendant

B. U.S. Customs and Border Protection

- Defendant reports Border agent told her "heavy lithium"
- All records of:

- Border encounters involving Defendant
- Border agent statements to Defendant
- Any toxicology or medical data referenced by Border agents
- Any communications about Defendant

C. U.S. Navy

- Defendant reports Navy personnel told her about implant counts
- All records of:
 - Interactions between Navy personnel and Defendant
 - Any medical or technical assessments referenced
 - Any communications about Defendant

D. Department of Defense / Defense Advanced Research Projects Agency (DARPA)

- Records of any DEW or neuroweapon testing in Defendant's area
- Records of any human subjects research involving Louisiana residents
- Any communications about Defendant

E. Department of Justice / Federal Bureau of Investigation

- Any investigations into DEW deployment in Louisiana
- Any investigations into Defendant's allegations
- Any communications about Defendant

Why This Evidence Is Exculpatory:

If records show:

- Defendant DID have contact with these agencies (corroborates her reports)
- Agencies acknowledged targeting or surveillance (validates her claims)
- Agencies had information about her situation (proves she's not making it up)

Then Defendant's reports are ACCURATE, not "delusional."

Materiality:

If federal records corroborate Defendant's account:

- DSM-based "delusional disorder" diagnosis fails
- Competency challenge fails
- Defendant's credibility is established
- Compulsion defense gains support

This evidence is MATERIAL under Brady.

CATEGORY 3: ENVIRONMENTAL MONITORING AND SURVEILLANCE RECORDS

Evidence Requested:

A. Electromagnetic Spectrum Analysis

- RF emissions logs for Defendant's area of residence
- Cell tower transmission records
- Radar installations and operations
- Any directed energy weapon systems in area
- Any government EM operations in vicinity

B. Surveillance Records

- Any video surveillance capturing Defendant
- Any audio surveillance
- Any tracking or monitoring (GPS, license plate readers, etc.)
- Any informant reports
- Any intelligence gathering

C. Infrastructure Records

- Communications infrastructure in Defendant's area
- Military installations or operations
- Government facilities with EM capabilities
- Private contractors with DEW capabilities

Why This Evidence Is Exculpatory:

If environmental testing shows:

- Elevated RF emissions in Defendant's area
- DEW systems operational nearby
- Surveillance of Defendant ongoing

Then external causation for Defendant's reports is confirmed.

If surveillance shows:

- Events Defendant described actually occurred
- Third parties corroborate her accounts
- Timeline matches her reports

Then Defendant's perception is accurate, not delusional.

Materiality:

Environmental evidence could:

- Prove external technological targeting
- Validate Defendant's reports
- Undermine psychiatric diagnosis
- Support compulsion defense

This evidence is MATERIAL under Brady.

CATEGORY 4: FEDERAL AGENCY RECORDS AND INVESTIGATION OF OFFICIAL STATEMENTS

Evidence Requested:

A. Border Patrol Records - "Heavy Lithium" Statement

Key Question: WHY would Border agent say this?

- Complete records of Defendant's Border Patrol encounters
- Identity of agent who made "heavy lithium" statement
- Agent's report of encounter
- Any medical data agent had access to (authorized or unauthorized)
- Communications between Border Patrol and other agencies regarding Defendant
- Investigation: Was agent acting on orders? Compelled? Given unauthorized data?

B. NSA Records - "Don't Talk to Local PD" Statement

Key Question: WHY would NSA contact civilian and tell her not to report to police?

- Identity of NSA personnel who contacted Defendant
- NSA records of communication with Defendant
- NSA operational files regarding Defendant
- Investigation: What operation was NSA referencing? Why suppress local police contact?

C. Navy Records - Implant Count Statement

Key Question: WHY would Navy personnel tell Defendant specific implant counts?

- Identity of Navy personnel who spoke with Defendant
- Navy medical or research records regarding Defendant
- Any Navy programs involving technological implants or monitoring
- Investigation: What implants were referenced? Navy research involvement?

D. RF Emissions Data (MindNexus-Style Scanning)

- Any federal agency RF scanning data on Defendant
- Research programs documenting RF emissions from TI bodies
- MindNexus findings (publicly available research on TI RF emissions)
- COVID vaccine nano-technology research (potential vector for RF-emitting materials)

Why This Evidence Is Exculpatory:

If records show:

- Border agent was compelled to make statement OR had unauthorized medical access
- NSA was conducting operation involving Defendant and instructed her to avoid police
- Navy had knowledge of technological intervention in Defendant's body
- RF emissions detected from Defendant's body (as documented by MindNexus in other TIs)

Then Defendant's reports are ACCURATE, not "delusional."

Materiality:

Federal records could:

- Prove agency involvement in targeting
- Validate Defendant's specific claims about what officials told her
- Demonstrate compulsion of federal personnel (if statements were forced)
- Confirm technological intervention (RF emissions, implants)
- Support compulsion defense

This evidence is MATERIAL under Brady.

CATEGORY 5: WITNESS STATEMENTS AND IMPEACHMENT EVIDENCE

Evidence Requested:

A. SGT Green Statements

- Complete audio/video of SGT Green interviews in IA-2300029
- Any other statements by SGT Green about compelled conduct
- SGT Green's employment and disciplinary records

B. Other Officer Statements

- Statements by any officers reporting compelled conduct
- Statements by officers involved in Defendant's arrest
- Disciplinary records for involved officers

C. Evaluator Bias/Error Records

- Disciplinary records for Dr. Verret, Dr. DeLand, or other evaluators
- Prior cases where their diagnoses were challenged
- Error rates in their evaluations
- Financial relationships with State

Why This Evidence Is Exculpatory:

SGT Green and other officers:

- Provide institutional corroboration of compelled conduct
- Establish pattern
- Impeach State's "this doesn't happen" position

Evaluator records:

- Impeach credibility of State's experts
- Show bias or error rate
- Undermine reliability of DSM-based evaluations

Materiality:

Witness and impeachment evidence could:

- Corroborate Defendant's compulsion defense
- Impeach State's experts
- Establish broader pattern

This evidence is MATERIAL under Brady.

CATEGORY 6: SIMILAR INCIDENTS AND PATTERN EVIDENCE

Evidence Requested:

A. Other Cases

- Other individuals in Louisiana reporting DEW targeting
- Other arrests involving claims of compulsion
- Other LSP investigations into electromagnetic phenomena
- Other federal investigations

B. Pattern Documentation

- PACTS International reports for Louisiana
- Targeted Individual advocacy group reports
- Similar complaints filed with authorities

Why This Evidence Is Exculpatory:

If multiple individuals:

- Report identical experiences
- In same geographic area
- With similar institutional responses

Then Defendant is not unique "mentally ill" person but one of many victims.

Materiality:

Pattern evidence could:

- Establish systematic targeting
- Corroborate Defendant's reports
- Undermine "isolated delusion" theory
- Prove coordinated operation

This evidence is MATERIAL under Brady.

IV. STATE'S OBLIGATION TO OBTAIN EVIDENCE

**The State Cannot Claim Ignorance
Under *Brady* and Louisiana law:**

The State must:

1. **Search** for exculpatory evidence
2. **Obtain** evidence from cooperating agencies
3. **Disclose** everything material

The State cannot avoid *Brady* by:

- Not asking federal agencies for records
- Not conducting environmental testing
- Not reviewing IA-2300029 file
- Claiming "we don't have it"

If evidence exists and is material, State must get it and produce it.

V. TIMING

Brady Material Must Be Disclosed in Time for Effective Use

For competency proceedings: Discovery must be provided BEFORE evaluation so defense can:

- Present alternative evaluation framework
- Challenge State's experts with impeachment evidence
- Provide evaluators with complete context

For trial (if it proceeds): Discovery must be provided in time for defense investigation, expert retention, and preparation.

Defendant requests production within 14 days of Court's order.

VI. CONSEQUENCES OF BRADY VIOLATION

If the State fails to disclose material exculpatory evidence:

Remedies include:

- Dismissal of charges
- Exclusion of State's evidence
- Adverse inference instruction
- Sanctions against State
- New trial (if violation discovered post-conviction)

Brady violations are serious constitutional violations that cannot be excused.

VII. RELIEF SOUGHT

WHEREFORE, Defendant respectfully requests that this Honorable Court:

1. **ORDER** the State to produce within 14 days all evidence described in Categories 1-6 above;
2. **ORDER** the State to obtain from federal agencies (NSA, Border Patrol, Navy, DOJ, FBI, DoD, DARPA) all records concerning Defendant and produce within 30 days;
3. **ORDER** the State to conduct environmental testing (EM spectrum analysis, surveillance records, infrastructure assessment) and produce results within 30 days;
4. **ORDER** the State to conduct medical testing (toxicology for "heavy lithium," imaging for implants) and produce results within 30 days;
5. **ORDER** the State to search for and produce evidence of similar incidents and pattern evidence within 30 days;
6. **ORDER** the State to produce a sworn certification that it has complied with all *Brady* obligations, including obtaining evidence from cooperating agencies;
7. **HOLD** a hearing if the State claims any requested evidence does not exist or cannot be obtained, requiring State to explain what efforts were made;
8. **IMPOSE SANCTIONS** including dismissal of charges if State fails to comply with *Brady* obligations;
9. **STAY** all proceedings pending production of *Brady* material; and
10. **GRANT** any other relief this Court deems just and proper.

Respectfully submitted,

Reverend David Lucito

Next Friend for Defendant Caroline Harris

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Motion for Discovery of Exculpatory Evidence (Brady Motion) was served upon the St. Mary Parish District Attorney's Office by [method of service] on the 2nd day of March, 2026.



Reverend David Lucito