

**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 TO COMPEL ELECTROMAGNETIC ENVIRONMENT ASSESSMENT AND TESTING**

**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 conduct comprehensive electromagnetic environment assessment and testing to rule out or confirm external technological causation of Defendant's reported experiences, pursuant to *Brady v. Maryland*, Louisiana Code of Criminal Procedure Article 718, the Due Process Clause, and the Right to Present a Complete Defense.

### ***I. GROUNDS***

This Motion is filed pursuant to:

- *Brady v. Maryland*, 373 U.S. 83 (1963) (duty to produce exculpatory evidence)
- Louisiana Code of Criminal Procedure Article 718
- Due Process Clause of the Fourteenth Amendment
- Right to present a complete defense (Sixth Amendment)
- *Ake v. Oklahoma*, 470 U.S. 68 (1985) (right to expert assistance)

### ***II. LEGAL FRAMEWORK***

#### ***A. Due Process Requires Investigation of Alternative Causation***

**The State cannot simply assert Defendant is "mentally ill" while refusing to test environmental causes.**

**Under basic due process:**

- Defendant has right to present defense
- If defense is "external causation," State must allow testing
- Court has authority to order necessary investigation

**Precedent:**

- Criminal defendants have right to obtain evidence supporting defense
- Courts can compel testing when material to defense
- Refusal to test while asserting internal causation violates due process

#### ***B. Brady Encompasses Testing That Could Produce Exculpatory Evidence***

***Brady* is not limited to existing documents.**

**If testing could reveal exculpatory evidence, *Brady* requires it.**

**Examples:**

- DNA testing (could exonerate)

- Ballistics testing (could exclude defendant's weapon)
- Toxicology testing (could show involuntary intoxication)

**Here:**

- **EM testing could show external DEW deployment** (exculpatory)
- **Toxicology could confirm "heavy lithium"** (corroborates Defendant)
- **Imaging could confirm implants** (corroborates Defendant)

**Brady requires the State to conduct testing that could produce material exculpatory evidence.**

***C. Ake Right to Expert Assistance Includes Environmental Testing***

***Ake v. Oklahoma:***

> "When a defendant demonstrates to the trial judge that his sanity at the time of the offense is to be a significant factor at trial, the State must... assure the defendant access to a competent psychiatrist who will conduct an appropriate examination."

**Here:**

- Defendant's mental state is THE central issue (competency proceeding)
- Defendant claims external causation (not internal pathology)
- **Defendant needs environmental testing expert, not just psychiatrist**

**Ake extends beyond psychiatrists to whatever expertise defendant needs for defense.**

### **III. WHAT TESTING IS REQUIRED**

Defendant requests this Court ORDER the following testing:

#### **TEST CATEGORY 1: ELECTROMAGNETIC SPECTRUM ANALYSIS**

**What:** Comprehensive RF spectrum analysis of Defendant's environment

**How:**

- Deploy RF spectrum analyzer equipment
- Monitor frequencies from ELF (Extremely Low Frequency) through microwave
- Record 24-hour cycles over minimum 7 days
- Document:
  - Peak emissions
  - Pulsed signals
  - Modulated transmissions
  - Directional sources
  - Timing correlations with Defendant's reported symptoms

**Locations to Test:**

- Defendant's residence
- Areas where Defendant reports strongest effects
- Current detention facility
- Surrounding area for baseline comparison

**Expert Required:**

- RF engineer or physicist
- Familiar with DEW signatures
- Experience with electromagnetic environment assessment

**Why This Is Material:**

**If testing reveals:**

- Elevated RF emissions targeted at Defendant's location
- Pulsed signals matching DEW characteristics
- Modulated transmissions matching V2K profiles
- Timing correlation with Defendant's reported effects

**Then external causation is CONFIRMED.**

**This would:**

- Validate Defendant's reports
- Undermine DSM-based psychiatric diagnosis
- Establish compulsion defense
- Prove State's "mental illness" theory is wrong

**This evidence is MATERIAL.**

**TEST CATEGORY 2: INVESTIGATION OF OFFICIAL STATEMENTS & RF EMISSIONS TESTING**

**What:** Investigation into WHY federal officials made bizarre statements to Defendant + Referrals testing

**A. Investigation of Border Patrol Statement ("Heavy Lithium")**

**The Question Is NOT "Does she have lithium?"**

**The Question IS: "Why would Border Patrol say this?"**

Border agent told Defendant "heavy lithium in your blood." This is:

- Highly unusual statement for Border agent to make
- Suggests either: (1) Agent had access to medical data they shouldn't have, OR (2) Agent was compelled to make statement as part of targeting operation
- **The statement itself is evidence of federal agency involvement**

**Investigation needed:**

- Interview Border agent who made statement
- Obtain Border Patrol records of encounter
- Determine: Was agent acting on orders? Compelled? Had unauthorized medical access?

**B. Investigation of NSA Statement ("Don't talk to local PD")**

**Why would NSA tell civilian not to contact police?**

This statement suggests:

- NSA knowledge of targeting operation
- NSA instruction to keep targeting concealed from local authorities
- Potential NSA involvement in or knowledge of operation

**Investigation needed:**

- Identify NSA personnel who contacted Defendant
- Obtain NSA records of communication
- Determine: Why was NSA contacting civilian? What operation were they referencing?

**C. Investigation of Navy Statement (Implant Counts)**

**Why would Navy personnel tell Defendant specific implant counts?**

This suggests:

- Navy knowledge of technological intervention
- Navy involvement in or monitoring of targeting
- Navy personnel potentially compelled to make statement

**Investigation needed:**

- Identify Navy personnel involved
- Obtain Navy records
- Determine: What implants were being referenced? Navy research program?

**D. RF Emissions Testing (MindNexus Protocol)**

**MindNexus and similar researchers conduct RF scans of targeted individuals and have documented:**

- Most TIs emit measurable RF signals from their bodies
- Signals not present in non-targeted control subjects
- Even deceased TI bodies in graveyards emit RF signals
- Hypothesis: Signals related to nano-technology, possibly introduced via COVID vaccines or other vectors

**Testing Protocol:**

- RF spectrum analysis of Defendant's body (similar to MindNexus scans)
- Frequency range: VLF through microwave
- Compare to baseline (non-targeted individuals)
- Document any anomalous emissions from Defendant's body

**E. Biomarkers of RF Exposure**

- Oxidative stress markers
- Heat shock proteins
- DNA damage markers
- Inflammatory markers consistent with chronic RF exposure

**Experts Required:**

- RF engineer familiar with body emissions testing
- Investigator with authority to interview federal agents
- Biomarker specialist

**Why This Is Material:**

**If investigation reveals:**

- Border agent made statement under compulsion or based on unauthorized data access
- NSA contacted Defendant regarding actual targeting operation
- Navy personnel had knowledge of technological intervention
- RF emissions detected from Defendant's body (as MindNexus documents)
- Biomarkers consistent with RF exposure present

**Then:**

- Federal agency involvement is proven
- Technological targeting is confirmed
- Defendant's reports are validated
- Compulsion defense is supported

**This evidence is MATERIAL.**

**TEST CATEGORY 3: MEDICAL IMAGING FOR FOREIGN OBJECTS**

**What:** Imaging to detect implants or foreign objects

**Specific Imaging:**

**A. MRI (Magnetic Resonance Imaging)**

- High-resolution brain MRI
- Full-body MRI if Navy personnel mentioned specific implant locations
- Look for:
  - Foreign metallic or non-metallic objects
  - Unusual tissue responses
  - Scarring consistent with implantation

**B. CT Scan (Computed Tomography)**

- Particularly for detecting metallic objects
- Can identify objects too small for standard X-ray

**C. Ultrasound**

- For soft tissue masses
- Non-invasive detection of subcutaneous objects

**Expert Required:**

- Radiologist
- Familiar with implant detection
- Experience with forensic imaging

**Why This Is Material:**

**If imaging reveals:**

- Foreign objects/implants present
- Number/location matches what Navy personnel allegedly told Defendant
- Evidence of external implantation

**Then:**

- Navy personnel's statement to Defendant is corroborated
- External intervention is proven
- Defendant's reports are validated

**This evidence is MATERIAL.**

**TEST CATEGORY 4: NEUROLOGICAL AND PHYSIOLOGICAL ASSESSMENT**

**What:** Assessment by specialists in DEW effects

**Specific Assessments:**

**A. Havana Syndrome Evaluation**

- Evaluation by physicians familiar with Havana Syndrome
- Symptom comparison
- Neurological function testing
- Balance and vestibular testing

**B. Electromagnetic Hypersensitivity Assessment**

- Controlled exposure testing
- Symptom provocation/cessation with shielding
- Correlation of symptoms with EM sources

**C. Cognitive Function Baseline**

- Neuropsychological testing
- Separate from psychiatric evaluation
- Establish cognitive function independent of targeting effects

**Experts Required:**

- Physicians familiar with Havana Syndrome (may need to bring in from NIH or State Dept medical team)
- Researchers familiar with EHS
- Neuropsychologist

**Why This Is Material:**

**If assessment shows:**

- Symptom profile matches Havana Syndrome
- Symptoms provoked by EM exposure and relieved by shielding
- Cognitive function intact when not under active targeting

**Then:**

- External causation is confirmed
- "Mental illness" diagnosis is refuted
- Competency is established

**This evidence is MATERIAL.**

**TEST CATEGORY 5: SURVEILLANCE AND INFRASTRUCTURE AUDIT**

**What:** Assessment of surveillance and EM infrastructure in Defendant's area

**Specific Investigation:**

**A. Surveillance Systems**

- Cell towers (transmission logs, directional antennas)
- Traffic cameras
- Private security cameras
- Government surveillance equipment
- Stingray/IMSI catchers (cell phone interceptors)

**B. EM Infrastructure**

- Radar installations
- Military facilities
- Government installations with EM capabilities
- Private contractors with DEW capabilities
- Communications infrastructure

**C. Access Logs**

- Who accessed surveillance of Defendant
- When was Defendant monitored
- What agencies were involved

**Experts Required:**

- Electronic surveillance specialist
- Former intelligence/military personnel familiar with surveillance operations
- Infrastructure engineer

**Why This Is Material:**

**If investigation reveals:**

- Extensive surveillance of Defendant
- Government/military EM infrastructure proximate to Defendant
- Access logs showing monitoring

**Then:**

- Defendant's reports of being watched are validated
- Infrastructure for targeting is confirmed
- Pattern of coordinated operation is established

**This evidence is MATERIAL.**

**IV. STATE CANNOT REFUSE WHILE ASSERTING INTERNAL CAUSATION**

**The State's Position:**

- Defendant's reports are "delusions"

- Caused by "mental illness"
- Internal (brain-based) problem

**Defendant's Position:**

- Reports are accurate
- Caused by external technological targeting
- External (environment-based) problem

**These are competing factual hypotheses.\*\***

**The State cannot:**

- Assert internal causation
- While refusing to test external causation
- And claim due process is satisfied

**This is circular reasoning:**

- "We assume it's internal"
- "So we won't test external"
- "Since we didn't test external, it must be internal"

**Due process requires:**

- **TEST BOTH HYPOTHESES**
- **Let evidence determine truth**
- **Don't assume conclusion**

**If the State wants to prove internal causation:**

- **The State must rule out external causation**
- **That requires testing the environment**

## ***V. COST IS NOT AN EXCUSE***

**The State may argue testing is expensive.**

**Response:**

**1. *Ake v. Oklahoma* establishes State's obligation**

- State must provide expert assistance to indigent defendants
- Cost is not excuse when material to defense
- "The State's interest in prevailing at trial... cannot be controlling" when defendant's fundamental rights are at stake

**2. The State chose to prosecute**

- Having initiated prosecution, State must bear costs of fair proceeding
- Cannot deny defendant ability to defend due to cost

**3. Testing costs are modest compared to alternative**

- EM spectrum analysis: ~\$5,000-\$15,000
- Toxicology panel: ~\$2,000-\$5,000
- Imaging: ~\$3,000-\$8,000
- **Total: ~\$10,000-\$30,000**

**Compare to:**

- Cost of wrongful conviction: Incalculable
- Cost of indefinite psychiatric commitment: \$200,000+ per year
- Cost of constitutional violation: Priceless

**4. Federal agencies may bear costs**

- If federal agencies involved (as Defendant reports), federal government should pay
- State can request federal assistance

**Cost cannot justify denying defendant the ability to prove her defense.**

## ***VI. TIMING***

**Testing must occur BEFORE competency determination.**

**Why:**

- If testing confirms external causation, competency evaluation changes entirely
- Cannot fairly evaluate competency while refusing to test defendant's core defense
- Results must be available to defense experts and evaluators

**Proposed Timeline:**

- **Within 7 days:** Court order testing
- **Within 30 days:** Testing completed
- **Within 45 days:** Results provided to defense
- **Within 60 days:** Defense experts review and report
- **THEN:** Competency hearing (if still necessary)

**VII. ALTERNATIVE: DEFENDANT WILL CONDUCT TESTING**

**If Court declines to order State to conduct testing:**

**Defendant requests:**

1. **Authorization for defense experts** to conduct testing
2. **Access to necessary locations** (Defendant's residence, etc.)
3. **Cooperation from State agencies** (access to surveillance logs, infrastructure data)
4. **Costs to be borne by State** under *Ake*

**Defendant should not be denied ability to test her defense simply because State refuses to do so.**

**VIII. RELIEF SOUGHT**

WHEREFORE, Defendant respectfully requests that this Honorable Court:

1. **ORDER** the State to conduct comprehensive electromagnetic spectrum analysis of Defendant's environment within 30 days;
2. **ORDER** the State to conduct investigation into federal official statements within 30 days:
  - Interview Border Patrol agent who made "heavy lithium" statement
  - Interview or obtain records from NSA personnel who contacted Defendant
  - Interview or obtain records from Navy personnel who mentioned implants
  - Determine why these federal officials made these specific statements;
3. **ORDER** the State to conduct RF emissions testing of Defendant (MindNexus protocol) to detect any anomalous signals emitting from Defendant's body within 30 days;
4. **ORDER** the State to conduct biomarker testing for RF exposure (oxidative stress, heat shock proteins, DNA damage, inflammatory markers) within 30 days;
3. **ORDER** the State to conduct medical imaging (MRI, CT, ultrasound) to detect foreign objects/implants within 30 days;
4. **ORDER** the State to arrange neurological and physiological assessment by experts familiar with Havana Syndrome and DEW effects within 45 days;
5. **ORDER** the State to conduct surveillance and infrastructure audit of Defendant's area within 30 days;
6. **ORDER** that all testing results be provided to defense immediately upon completion;
7. **ORDER** that defense experts have access to all raw data, not just summary reports;
8. **STAY** all competency proceedings pending completion of testing and defense expert review;
9. **In the alternative**, if Court declines to order State testing, **AUTHORIZE** and **FUND** defense experts to conduct testing with State cooperation; and
10. **GRANT** any other relief this Court deems just and proper.

**Respectfully submitted,**

Reverend David Lucito

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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing Motion to Compel Electromagnetic Environment Assessment and Testing was served upon the St. Mary Parish District Attorney's Office by [method of service] on this 2nd day of March, 2026.

Reverend David Lucito  
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