

STATE OF LOUISIANA  
SIXTEENTH JUDICIAL DISTRICT COURT  
PARISH OF ST. MARY  
STATE OF LOUISIANA

v.

CAROLINE NICOLE HARRIS  
CASE NO. 2025-215897  
SECTION: 6

**Ω - In Nomine Patris et Filii et Spiritus Sancti**

## **NOTICE OF INTENT TO DISCLOSE CLASSIFIED INFORMATION AND MOTION FOR PRETRIAL CONFERENCE PURSUANT TO THE CLASSIFIED INFORMATION PROCEDURES ACT (CIPA)**

NOW INTO COURT, comes Reverend David Edward Lucito, appearing as Next Friend for the Defendant, Caroline Nicole Harris, who hereby notifies this Court and the State of Louisiana that the defense of Ms. Harris will necessitate the disclosure and use of classified information. Pursuant to the **Classified Information Procedures Act**, 18 U.S.C. app. 3 §§ 1-16 (hereinafter "CIPA"), the Defendant respectfully moves this Court to schedule a pretrial conference to establish procedures for the handling of this information.

### **I. THE NEXUS BETWEEN CLASSIFIED INFORMATION AND THE DEFENSE**

The charges against the Defendant, and the very circumstances of her arrest and prosecution, are inextricably linked to her status as a target of, and potential witness against, ongoing operations involving classified methods, technologies, and state secrets.

**The defense will demonstrate that the current prosecution is not a legitimate pursuit of justice, but rather a pretextual action designed to silence, discredit, and unlawfully contain the Defendant to prevent the disclosure of this classified information.**

Specifically, the defense intends to introduce evidence concerning:

#### ***a. Classified Surveillance Technologies and Remote Influencing Systems***

Including but not limited to electromagnetic weapons, voice-to-skull technology, and neural manipulation systems documented in classified research programs.

#### ***b. The Operational Security Protocols of Federal and State Agencies Involved***

Including the conduct of personnel from federal agencies (NSA, Border Patrol, Navy, unidentified federal agents) who made compelled statements to the Defendant, as well as Louisiana State Police officers who admitted to being "robotted" in LSP-IA-2300029.

#### ***c. The Use of Such Technologies to Provoke, Manipulate, and Entrap Targeted Individuals***

The defense will prove that Caroline Nicole Harris was subjected to external technological compulsion designed to create the appearance of criminal conduct and mental instability, thereby providing pretext for her detention and psychiatric labeling.

### **II. LEGAL REQUIREMENT FOR CIPA PROCEDURES**

CIPA was enacted by Congress to provide a procedural framework for courts to handle cases where classified information is relevant to the defense. Its purpose is to balance the defendant's right to a fair trial, including the right to present a full defense, against the government's legitimate interest in protecting national security.

**Section 2 of CIPA mandates that "the court, upon motion of the United States, shall, and upon motion of the defendant, may, hold a pretrial conference to consider matters relating to classified information that may arise in connection with the prosecution."**

Given that the exposure of the State's motive is the cornerstone of the defense, a CIPA conference is not merely optional; **it is essential to prevent a miscarriage of justice.**

### **III. THE STATE CANNOT PROCEED WITHOUT RESOLVING THIS ISSUE**

The State cannot be permitted to use the criminal justice system as a shield to hide its own classified operations, prosecuting a target for reacting to stimuli while simultaneously invoking secrecy to conceal the nature of those stimuli.

**To deny this motion would be to deny the Defendant her right to present a defense entirely.**

The State would be put in the unconstitutional position of prosecuting a case where the primary exculpatory evidence is deemed "too secret" to be heard.

### **IV. PROCEDURES REQUESTED**

The defense requests that this Court:

1. **Acknowledge** the notice of intent to disclose classified information
2. **Schedule** an immediate pretrial conference pursuant to Section 2 of CIPA
3. **Establish procedures** for:
  - Discovery of classified information
  - In camera review of classified evidence
  - Substitution of classified information with unclassified summaries where appropriate
  - Security clearances for defense counsel if necessary
  - Use of a Sensitive Compartmented Information Facility (SCIF) for testimony if required
4. **Order** the State of Louisiana and any relevant federal agencies to participate in CIPA procedures

### **WHEREFORE**

IT IS PRAYED that this Honorable Court:

1. **GRANT** this motion and formally acknowledge the notice of intent to disclose classified information.
2. **SCHEDULE** an immediate pretrial conference pursuant to Section 2 of CIPA to establish procedures for discovery, handling, and admission of classified evidence.
3. **ORDER** the State of Louisiana to appear at said conference and be prepared to address the CIPA framework.
4. **STAY** all other substantive proceedings, including the unlawful sanity hearing, until the CIPA procedures are fully resolved.

Respectfully submitted,

**REVEREND DAVID EDWARD LUCITO**

Next Friend for Defendant Caroline Nicole Harris

104 Tillou Andrus Drive

Opelousas, Louisiana 70570

(337) 326-9914

realbrotherdank@gmail.com

### **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing Notice of Intent to Disclose Classified Information and Motion for Pretrial Conference Pursuant to the Classified Information Procedures Act

(CIPA) was served upon all parties of record via the Tybera e-filing system on this \_\_\_\_\_, 2026.

*M. Ed*

Reverend David Edward Lucito

**AΩ - THE LIGHT REMAINS THE CONSTANT  
END OF NOTICE AND MOTION**

*[Handwritten signature]*

*David David  
Edward Lucito*