

CRIMINAL DOCKET NO. 60,600

STATE OF LOUISIANA	FILED Union Parish Clerk of Court	3 <sup>rd</sup> JUDICIAL DISTRICT
VERSUS	JUL 13 2023	PARISH OF UNION
CHRIS HARPIN	Monet Frazier, Deputy Clerk Third Judicial District Court	STATE OF LOUISIANA

BILL OF PARTICULARS  
IN COMPLIANCE WITH ORDER DATED JULY 10, 2023

NOW INTO COURT, through the undersigned Assistant District Attorney, comes the State of Louisiana, and in compliance with the court’s order respectfully provides the following particulars in relation to Count 13 of the indictment issued against Chris Harpin:

I.

All previous responses to discovery and Bills of Particulars are incorporated herein.

II.

The battery/malfeasance referenced in Count 13 is detailed on pages 52 and 53 of the expert report from Seth Stoughton, those pages attached hereto as Exhibit A. They clearly reference a time frame via time stamp, and clearly indicate the owner/operator video from which they were derived. The time stamps referenced on those pages are not exclusive, and represent a singular frame of the referenced battery, all of which has been in possession of the defendant since March 14, 2023. Stoughton’s report may be found at “LSP/LSP Thumb Drive 2/Preliminary Expert Report, 11-29-2022.”

WHEREFORE, the State of Louisiana, through the undersigned Assistant District Attorney, prays that these particulars be deemed good and sufficient.

Respectfully submitted,

JOHN BELTON  
District Attorney

By:

  
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 Hugo A. Holland, Jr., 18733  
 Assistant District Attorney  
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[dahugo@me.com](mailto:dahugo@me.com)

CERTIFICATE

I HEREBY CERTIFY that a copy of the foregoing Bill of Particulars in Compliance with Order Dated July 10, 2023 has been delivered electronically to Gene Cicardo at [epcjr@gencicardolaw.com](mailto:epcjr@gencicardolaw.com) on this the 11<sup>th</sup> day of July, 2023.

  
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Hugo A. Holland, Jr.  
Assistant District Attorney

When standing near where Mst. Tpr. York was bending over Mr. Greene, Dep. Harpin raised his knee for a prolonged period in a position consistent with placing his foot onto Mr. Greene (although the video is not definitive on this point), as reflected in the following screen captures:

Clary BWC (Axon Body 2 X81141206), T05:41:32Z (Multicam 00:28:28.306)  
(Cropped)



Clary BWC (Axon Body 2 X81141206), T05:41:32Z (Multicam 00:28:28.707)  
(Cropped, Labelled)



Exh A

Clary BWC (Axon Body 2 X81141206), T05:41:34Z (Multicam 00:28:30.508)  
(Cropped, Labelled)



Around this time, Mr. Greene continued to make wordless noises consistent with expressions of pain or distress while also verbalizing, "I'm sorry,"<sup>147</sup> and, "Okay, okay, okay."<sup>148</sup>

Mst. Tpr. Hollingsworth walked back over to where Dep. Harpin and Mst. Tpr. York were interacting with Mr. Greene, and all three officers appeared to bend over Mr. Greene.<sup>149</sup>

Shortly thereafter, Mr. Greene made a loud noise consistent with an expression of pain or distress and one of the nearby officers said, "Yeah! Yeah, that shit hurts, doesn't it?"<sup>150</sup> Within a few seconds, Mr. Greene loudly says, "Okay. Alright, Lord Jesus. Oh, Lord. Okay, okay. Lord Jesus" and apologizing several times.<sup>151</sup>

While Mr. Greene was speaking, officers rolled him to his side<sup>152</sup> and told him to sit on his butt.<sup>153</sup> At this point, Mr. Greene had been kept in the prone position for approximately ten minutes and nineteen seconds (0:10:19) after being secured in handcuffs<sup>154</sup> and approximately one minute and

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<sup>147</sup> Clary BWC (Axon Body 2 X81141206), T05:41:33Z.

<sup>148</sup> Clary BWC (Axon Body 2 X81141206), T05:41:46Z.

<sup>149</sup> Clary BWC (Axon Body 2 X81141206), T05:41:36Z.

<sup>150</sup> Clary BWC (Axon Body 2 X81141206), T05:41:49Z.

<sup>151</sup> Clary BWC (Axon Body 2 X81141206), T05:41:54Z.

<sup>152</sup> Clary BWC (Axon Body 2 X81141206), T05:42:02Z.

<sup>153</sup> Clary BWC (Axon Body 2 X81141206), T05:42:05Z.

<sup>154</sup> DeMoss BWC (Axon Body 2 X81118493), T05:31:48Z-42:07Z; Clary BWC (Axon Body 2 X81141206), T04:42:02Z.

Exh A