

STATE OF MAINE

June 20, 2025

YORK COUNTY SUPERIOR COURT

YORK

STATE OF MAINE,

Plaintiff,

v.

Lucas Lanigan,

Defendant.

Docket No.: YRKCD-CR-2024-04263

DEFENDANT'S MOTION TO SUPPRESS EVIDENCE AND REQUEST
FOR FRANKS HEARING

I. INTRODUCTION

NOW COMES the Defendant, by and through my own counsel, and respectfully moves this Honorable Court to suppress all evidence obtained as a result of an arrest and prosecution grounded in materially false and misleading statements contained within the arrest affidavit. Pursuant to *Franks v. Delaware*, 438 U.S. 154 (1978), when false statements—made knowingly, intentionally, or with reckless disregard for the truth—are essential to a finding of probable cause, the resulting evidence must be suppressed.

Once such false statements are excised from the affidavit at issue, there remains insufficient basis to support probable cause for the charge of Aggravated Assault by Strangulation. As such, Defendant requests a Franks hearing and appropriate relief thereafter.

II. LEGAL STANDARD – FRANKS v. DELAWARE

Under *Franks v. Delaware*, a defendant is entitled to an evidentiary hearing if they make a preliminary showing that:

1. The affiant knowingly, intentionally, or with reckless disregard for the truth included false statements or material omissions in the warrant affidavit; and
2. The false statements or omissions were necessary to the finding of probable cause.

If, after excising such statements and considering any material omissions, the affidavit does not establish probable cause, suppression of the resulting evidence is warranted.

III. FACTUAL BACKGROUND

1. The affidavit alleges that the Defendant strangled the alleged victim for approximately 20 seconds, leading to symptoms such as vomiting, petechiae, incontinence, and other indicators of impaired respiration.
2. However, body-worn camera (BWC) footage directly contradicts these claims. The alleged victim, witnesses, and the victim's son all state that the vomiting was the result of mixing alcohol with a prescribed medication—

disulfiram (commonly known as Antabuse)—designed to induce vomiting upon alcohol consumption.

3. The victim was visibly intoxicated and emotionally unstable at the time of the incident, and gave inconsistent, exaggerated accounts. These statements were later contradicted or corrected in follow-up interviews and by other witness statements.

4. Although hospital personnel were reportedly informed that the symptoms resulted from a physical altercation, contemporaneous video evidence shows that this narrative contradicts statements made directly to law enforcement by the victim.

5. Critically, the arresting officer failed to disclose—or may have deliberately ignored—exculpatory evidence contained in the BWC footage, including the victim’s own explanation for her symptoms.

IV. MATERIAL MISREPRESENTATIONS AND OMISSIONS IN THE AFFIDAVIT

The following statements and omissions from the affidavit are materially false, misleading, or incomplete, and were essential to the finding of probable cause:

- Duration of Strangulation EX A @ 18:01: The affidavit exaggerates the duration of the alleged strangulation. Video evidence and statements contradict this claim.
- Alleged Escape to Safety EX 6: The affidavit asserts that the victim fled to safety, but surveillance footage shows otherwise: the victim exited a door with no signs of pursuit or struggle and then re-entered voluntarily.
- Medical Symptoms Misattributed EX 6: Physical symptoms such as vomiting and incontinence were falsely attributed to strangulation. Medical records and the victim’s own statements indicate that these

- a. Suppress all evidence obtained as a result of the unlawful arrest; and/or
- b. Dismiss the charge of Aggravated Assault by Strangulation, or reduce it as appropriate.

VI. CONCLUSION

The affidavit in support of the Defendant's arrest and prosecution is fundamentally flawed under the standard set forth in *Franks v. Delaware*. The State's case rests on mischaracterizations, exaggerations, and material omissions—all of which are contradicted by objective video evidence and statements made contemporaneously to law enforcement. Probable cause does not exist in the absence of these misleading statements, and as such, suppression and/or dismissal is both appropriate and constitutionally required.

Respectfully submitted,

Lucas Lanigan

Pro Se

13 Grant St

Springvale ME 04083

207-351-5383

lukelanigan207@gmail.com

June 3rd 2025

ATTACHMENTS

- Exhibit A: Arrest Affidavit
 - Exhibit B: Timestamped Body cam Footage Descriptions or Transcripts Provide
 - Exhibit C: Witness Statements
 - Exhibit D: Redacted Medical Records
 - Exhibit E:
-