

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

STATE OF LOUISIANA  
v.  
CAROLINE NICOLE HARRIS  
CASE NO. 2025-215897  
DIVISION: Section 6

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EMERGENCY MOTION TO STRIKE UNAUTHORIZED INSANITY PLEA,  
VACATE ALL PROCEEDINGS DERIVED THEREFROM, AND FOR  
OTHER RELIEF INCIDENT THERETO

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NOW INTO COURT, through undersigned Next Friend, comes REVEREND DAVID EDWARD LUCITO, who respectfully moves this Honorable Court to strike the plea of "not guilty and not guilty by reason of insanity" entered by former counsel Taneisha Riggs on or about October 5, 2025, and to vacate all proceedings, orders, and appointments derived from said unauthorized plea.

MEMORANDUM IN SUPPORT

I. INTRODUCTION

I just filed through Tybera and noticed I gained access to this entire case docket despite not having paid for said access; and it's very good that I magically did so.

This Court is presented with an extraordinary circumstance: defense counsel entered a plea of "not guilty and not guilty by reason of insanity" on behalf of Caroline Nicole Harris without her knowledge, without her consent, and against her express wishes. The unauthorized plea has triggered a cascade of proceedings—including the appointment of a sanity commission (Drs. Verret and DeLand), a competency evaluation order (January 20, 2026), and a scheduled sanity hearing (May 12, 2026)—all of which rest upon a foundation that is jurisdictionally void.

Defendant Caroline Nicole Harris has never authorized an insanity defense. She has consistently maintained that her alleged conduct was the product of external technological compulsion—directed energy weapons, voice-to-skull transmissions, and behavior influence systems—not any "mental disease or defect." The insanity plea filed by Ms. Riggs misrepresents the very nature of Defendant's defense

and violates her fundamental right to control the objectives of her representation.

Because the underlying plea is unauthorized, every proceeding and order that flows from it is likewise void. This Court must strike the unauthorized plea, vacate all derivative proceedings, and permit Defendant—with conflict-free counsel—to enter the plea she actually chooses.

## II. FACTUAL BACKGROUND

### A. The Unauthorized Insanity Plea

On or about October 5, 2025, Taneisha Riggs, Public Defender Attorney representing Caroline Nicole Harris, filed a "Motion for Mental Examination as to Sanity at the Time of the Offense and Appointment of Sanity Commission" (Docket No. 2025-215897\_2578965). In that motion, counsel represented to this Court that:

> "Your Defendant has entered a plea of not guilty and not guilty by reason of  
> insanity pursuant to La. C. Cr. P. Art. 552(3)."

This representation was false. Defendant Caroline Nicole Harris never entered, authorized, or consented to any plea of "not guilty by reason of insanity."

### B. Defendant's Actual Position

Defendant has consistently maintained that her alleged conduct was compelled by external technological forces beyond her control. In her February 18, 2026 letter, she stated:

> "Made a mistake after being electrocuted in my parent's house."

This statement—and all of Defendant's communications—reflect a consistent position: her actions were the product of external force (directed energy weapons, voice-to-skull transmissions), not internal mental disease. She has never claimed insanity. She has never admitted voluntary conduct and sought leniency based on mental illness. She has always maintained that her actions were not voluntary at all.

### C. Proceedings Flowing from the Unauthorized Plea

Based on counsel's unauthorized motion, this Court entered the following orders:

1. \*\*October 16, 2025:\*\* Notice of Sanity Commission hearing set for October 29,

2025 (Doc. 2025-215897\_2578966);

2. **Date uncertain (late 2025):** Order appointing Dr. Luke Verret and Dr. Sarah DeLand to the Sanity Commission (Doc. 2025-215897\_2599189);
3. **January 20, 2026:** Order for competency evaluation (referenced in Motion to Vacate);
4. **January 30, 2026:** Official notice to Dr. Verret of his appointment, with Sanity Hearing scheduled for May 12, 2026 (Doc. 2025-215897\_2599190).

Every one of these proceedings rests upon the unauthorized insanity plea. If the plea is void, so too are all orders and proceedings derived from it.

### III. LEGAL STANDARD

#### A. Defendant Controls Fundamental Decisions

The United States Supreme Court has long held that certain fundamental decisions belong to the criminal defendant, not to counsel:

> "The accused has the ultimate authority to make certain fundamental decisions > regarding the case, as to whether to plead guilty, waive a jury, testify in > his or her own behalf, or take an appeal." Jones v. Barnes, 463 U.S. 745, 751 > (1983).

Among these fundamental decisions is **the choice of plea**. A defendant cannot be bound by a plea entered without her knowledge and consent. Boykin v. Alabama, 395 U.S. 238 (1969) (guilty plea must be knowing and voluntary); see also La. C.Cr.P. art. 552 (listing permissible pleas, including not guilty and not guilty by reason of insanity).

#### B. Louisiana Law on Insanity Plea

Louisiana Code of Criminal Procedure Article 552(3) permits a defendant to plead "not guilty and not guilty by reason of insanity." However, the decision to plead insanity is a **strategic choice belonging to the defendant**, not counsel. State v. Mercer, 564 So. 2d 783 (La. App. 2 Cir. 1990) (defendant's right to control fundamental decisions includes decision to pursue insanity defense).

Under La. C.Cr.P. art. 651, when a defendant pleads "not guilty," evidence of insanity is not admissible. The insanity defense is therefore only available if the defendant affirmatively pleads it. Counsel cannot unilaterally invoke the

insanity defense without the defendant's informed consent.

The Sixth Amendment guarantees a defendant the right to choose the fundamental objective of their defense, including the absolute right to maintain innocence. Pursuant to the U.S. Supreme Court's landmark ruling in *McCoy v. Louisiana*, 584 U.S. 414 (2018), defense counsel may not concede the physical acts of a crime through a plea of "Not Guilty by Reason of Insanity" (NGRI) over a defendant's express objection. An insanity plea is a strategic objective, not a tactical decision, and thus the authority to enter it rests solely with the accused. Forcing such a plea upon an unwilling defendant constitutes a "structural error"—a fundamental defect in the proceedings that bypasses the harmless-error analysis and requires the immediate striking of the unauthorized plea to restore the Defendant's constitutional autonomy and their right to present an accurate account of their reality.

#### C. Counsel Cannot Bind Defendant to Unauthorized Plea

When counsel acts without authority on a fundamental matter, the defendant is not bound. As the Louisiana Supreme Court has recognized:

> "Counsel's unauthorized actions that affect fundamental rights may render  
> subsequent proceedings void." *State v. Carpenter*, 99-1520 (La. App. 3 Cir.  
> 5/3/00) (citing *Strickland v. Washington*, 466 U.S. 668 (1984)).

The proper remedy when counsel has acted without authority is to vacate the unauthorized actions and restore the defendant to the position she would have occupied had counsel acted properly. See *United States v. Cronin*, 466 U.S. 648 (1984) (structural errors require automatic reversal).

#### D. Ineffective Assistance of Counsel

Even if this Court were to view the unauthorized plea through the lens of ineffective assistance, counsel's conduct falls below any objective standard of reasonableness. *Strickland v. Washington*, 466 U.S. 668 (1984). No reasonable attorney files an insanity plea without the client's knowing and voluntary consent. Moreover, the complete abandonment of client communication for six months (as documented in Defendant's February 2026 letters) independently establishes ineffective assistance.

### IV. ARGUMENT

#### A. The Insanity Plea Was Entered Without Defendant's Consent and Is Therefore Void

The record contains no evidence—and the State cannot produce any—that Caroline

Nicole Harris ever authorized a plea of "not guilty by reason of insanity." To the contrary, all evidence before this Court demonstrates that Defendant has consistently maintained a different position: that her conduct was compelled by external technological forces, not the product of any "mental disease or defect."

A defendant cannot be bound by a plea she never authorized. The unauthorized insanity plea is a nullity, and all proceedings flowing from it must be vacated.

#### B. The Unauthorized Plea Triggered a Cascade of Void Proceedings

The sanity commission was appointed **\*\*solely\*\*** because counsel represented that Defendant had entered an insanity plea. The order appointing Dr. Verret and Dr. DeLand (Doc. 2025-215897\_2599189) explicitly states:

> "Considering the foregoing Motion for Appointment of Sanity Commission under  
> La. C.Cr.P. Art. 650, previously submitted by Taneisha Riggs, Public Defender  
> Attorney representing Caroline Nicole Harris..."

If the underlying motion was unauthorized—and it was—then the order appointing the sanity commission is void. If the sanity commission appointment is void, then all subsequent orders based on that appointment—including the January 20, 2026 competency evaluation order and the May 12, 2026 sanity hearing—are likewise void.

#### C. The Sanity Commission Is Asking the Wrong Question

Even if the Court were to ignore the unauthorized plea issue, the sanity commission as currently constituted is fundamentally incapable of answering the relevant question. The commission was charged with determining:

1. What mental disease(s) or defect(s) Defendant suffered at time of offense;
2. Whether because of such disease/defect, Defendant was incapable of distinguishing right from wrong.

But Defendant's defense is **\*\*not\*\*** insanity. Her defense is **\*\*compulsion\*\***: external technological forces negating voluntary action. The sanity commission is asking and answering the wrong question. Its findings—whatever they may be—will be irrelevant to the actual issues in this case.

#### D. Dr. Verret and Dr. DeLand Lack Qualifications to Address the Actual Issues

Even if the Court were to permit the sanity commission to proceed (which it should not), Dr. Verret and Dr. DeLand lack expertise in:

- Directed energy weapon effects
- Voice-to-skull (V2K) technology
- Havana Syndrome and DEW bioeffects
- Electromagnetic targeting phenomena
- External technological compulsion generally

Their evaluation, conducted under the DSM-5-TR framework, will inevitably pathologize Defendant's accurate reports of targeting as "delusions" per the DSM's 2022 technology-dismissal language. This is precisely why Defendant filed a Motion to Vacate the competency evaluation and appoint qualified experts (Dr. Hoffer, Dr. Shajenko).

#### E. The Appropriate Remedy Is to Strike the Plea and Vacate All Derivative Proceedings

Because the unauthorized insanity plea is void, this Court should:

1. Strike the plea of "not guilty and not guilty by reason of insanity" from the record;
2. Vacate all orders, appointments, and proceedings derived from that plea, including:
  - The appointment of Dr. Luke Verret and Dr. Sarah DeLand to the Sanity Commission;
  - The January 20, 2026 order for competency evaluation;
  - The May 12, 2026 sanity hearing;
3. Permit Defendant to enter the plea of her choosing (which, based on her consistent statements, is presumably "not guilty" with notice of compulsion defense);
4. Appoint conflict-free counsel to represent Defendant going forward;
5. Stay all proceedings pending appointment of conflict-free counsel and entry of proper plea.

#### V. THE STATE CANNOT PREJUDICE DEFENDANT BASED ON COUNSEL'S UNAUTHORIZED ACTS

The State may argue that proceedings have already occurred and cannot be undone. This argument fails. When fundamental rights are violated—including the right to control one's own defense—the appropriate remedy is to restore the defendant to the position she would have occupied absent the violation. See *Vasquez v. Hillery*, 474 U.S. 254 (1986) (structural errors require reversal regardless of prejudice).

The State has no legitimate interest in preserving proceedings founded on an

unauthorized plea. To the contrary, the State's interest is in ensuring that defendants are tried only after proper proceedings, with proper pleas, and with proper counsel.

## VI. CONCLUSION

This case has been procedurally derailed from its inception. Counsel filed an insanity plea without Defendant's consent, triggering a sanity commission appointed to answer the wrong questions. Defendant now faces potential forced medication and indefinite commitment based on proceedings she never authorized and a defense she never chose.

This Court has the power—and the duty—to correct this fundamental error.

WHEREFORE, Defendant, through Next Friend, respectfully requests that this Honorable Court:

1. **\*\*STRIKE\*\*** the plea of "not guilty and not guilty by reason of insanity" entered by former counsel Taneisha Riggs;
2. **\*\*VACATE\*\*** all orders, appointments, and proceedings derived from said unauthorized plea, including but not limited to:
  - a. The appointment of Dr. Luke Verret and Dr. Sarah DeLand to the Sanity Commission;
  - b. The January 20, 2026 order for competency evaluation;
  - c. The May 12, 2026 sanity hearing;
3. **\*\*PERMIT\*\*** Defendant to enter the plea of her choosing;
4. **\*\*APPOINT\*\*** conflict-free counsel to represent Defendant going forward;
5. **\*\*STAY\*\*** all proceedings pending appointment of conflict-free counsel and entry of proper plea;
6. **\*\*ORDER\*\*** that any statements made by Defendant during evaluations conducted under the unauthorized proceedings be suppressed and not used against her in any future proceeding;
7. **\*\*GRANT\*\*** any other relief this Court deems just and proper.

Respectfully submitted,

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REVEREND DAVID EDWARD LUCITO

A handwritten signature in black ink, appearing to read "Reverend David Edward Lucito", written over a horizontal line. The signature is stylized and cursive.

Next Friend of Defendant Caroline Nicole Harris  
104 Tillou Andrus Drive  
Opelousas, Louisiana 70570  
(337) 326-9914  
realbrotherdank@gmail.com

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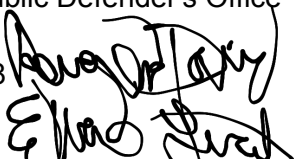
CERTIFICATE OF SERVICE

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I hereby certify that a true and correct copy of the foregoing Emergency Motion to Strike Unauthorized Insanity Plea was served upon all parties of record via the Tybera e-filing system on this 2<sup>nd</sup> day of March, 2026.

District Attorney M. Michael Haik, III  
St. Mary Parish District Attorney's Office  
500 Main Street, 3rd Floor  
Franklin, LA 70538

St. Mary Parish Public Defender's Office  
107 Wilson Street  
Franklin, LA 70538



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REVEREND DAVID EDWARD LUCITO

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THE LIGHT REMAINS THE CONSTANT

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