

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

v.

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

EMERGENCY MOTION TO DISQUALIFY THE OFFICE OF THE PUBLIC DEFENDER FOR
WILLFUL ABANDONMENT OF CLIENT AND IRRECONCILABLE CONFLICT OF INTEREST

NOW INTO COURT, comes the undersigned, REVEREND DAVID EDWARD LUCITO, appearing as Next Friend for Defendant Caroline Nicole Harris. The undersigned is not a attorney. He files this motion under protest and duress, compelled by the absolute and catastrophic failure of the counsel appointed to this case. This motion seeks the immediate removal of the St. Mary Parish Public Defender's Office, which has formally and willfully abandoned its client.

MEMORANDUM IN SUPPORT

I. INTRODUCTION: A WILLFUL ABDICATION OF DUTY

The Sixth Amendment's guarantee of counsel is not a bureaucratic formality. It promises a zealous advocate. For Caroline Harris, that promise has been willfully broken. Her appointed counsel has become an extension of the prosecution—a handler whose purpose is not to defend, but to process her according to a fraudulent script she never authorized and has actively disavowed.

The Court is already aware of the defense's position that the insanity plea entered on behalf of Caroline Harris was unauthorized, as detailed in the "Notice of Unauthorized Plea Entry" previously served upon all parties and filed with this Honorable Court.

On March 4, 2026, the undersigned directly informed counsel that the Defendant, Caroline Harris, had personally and explicitly confirmed to him on the preceding day that the insanity plea entered on her behalf was unauthorized.

Counsel's response to this critical, direct testimony from their client was a profound and willful act of abandonment. They stated they "need no more" information from the undersigned. They then confirmed their intention to "proceed with the sanity eval conclusions," consciously disregarding the fresh, direct testimony from their own client that the entire basis for that evaluation is fraudulent and was entered without her consent.

This is not a legal strategy. This is a documented, willful decision to abandon a client and enforce the State's narrative over her expressed will and innocence. Counsel must be removed.

II. ARGUMENT

A. The Public Defender's Office Has Willfully Abandoned Its Client.

An attorney's primary duty is loyalty to their client, including acting upon the client's direct instructions regarding fundamental decisions of their case. The Public Defender's Office has demonstrated its loyalty lies elsewhere.

Conscious Refusal to Accept Client's Direct Testimony:

Counsel was informed of Ms. Harris's recent, direct confirmation that the plea was unauthorized. Their decision to ignore this and instead "proceed with the sanity eval" is a shocking betrayal. It is a choice to believe a fraudulent state report over their own client. This severs the attorney-client relationship absolutely.

Willful Subordination of the Client's Will:

Ms. Harris has been explicit: the plea was unauthorized. By siding with the "sanity eval" over their own client's direct testimony, counsel has stripped Ms. Harris of her voice and her fundamental right to direct her own defense, a right affirmed in *McCoy v. Louisiana*.

B. An Irreconcilable Conflict of Interest Now Exists.

Counsel cannot serve two masters. The Public Defender's Office has made its choice: it serves the State's interest in validating the unauthorized plea. This is in direct, mortal conflict with Ms. Harris's interest in exposing that plea as a fraud and proving her innocence.

This conflict is not theoretical; it is absolute.

Ms. Harris's interest is to present her own testimony that the plea was unauthorized.

Counsel's interest is to ignore it.

Ms. Harris's interest is to fight the unauthorized plea. Counsel's interest is to enforce the conclusions of that plea.

Ms. Harris's interest is to have an advocate. Counsel's interest is to be an administrator of the State's narrative.

When counsel consciously disregards direct communication from their client to proceed with a state-sponsored evaluation their client rejects, the adversarial system has collapsed.

C. The Court's Only Remedy is Disqualification.

The system has failed Caroline Harris. Her state-appointed lawyers have willfully ignored her. In this extraordinary circumstance, a legal vacuum has been created, leaving her utterly defenseless. The undersigned, as Next Friend, is the only party who has consistently acted in her interest and honored her testimony. To leave her in the hands of these handlers is to condemn her without a trial.

III. CONCLUSION

This is a demand for constitutional integrity.

The Court cannot, in good conscience, allow this proceeding to continue with a defendant "represented" by counsel who has made a documented choice to ignore her, her testimony, and the evidence that could free her.

WHEREFORE, the undersigned, as Next Friend, respectfully demands that this Honorable Court:

GRANT this Emergency Motion;

ORDER the immediate disqualification and removal of the St. Mary Parish Public Defender's Office as counsel for Caroline Harris for willfully abandoning their client;

FORMALLY RECOGNIZE the undersigned, Reverend David Edward Lucito, as the sole legal representative for the Defendant in these proceedings, due to the complete and willful abandonment by the Office of the Public Defender;

SCHEDULE an immediate evidentiary hearing on this matter.

3/4/2026

Respectfully submitted, under protest and duress,

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