

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

STATE OF LOUISIANA

v.

CAROLINE NICOLE HARRIS

CASE NO. 2025-215897

**EMERGENCY MOTION TO COMPEL LEGAL COMMUNICATIONS,
MEDICAL TREATMENT, AND COUNSEL PERFORMANCE (SIXTH
AND EIGHTH AMENDMENTS)**

****NOW INTO COURT** comes Reverend David Edward Lucito, Next Friend and Material Witness under Louisiana Code of Criminal Procedure Article 646, who respectfully moves this Court to:

1. **ORDER immediate provision of UNLIMITED cost-free legal/pastoral calls** between Ms. Harris and Next Friend (material witness under Article 646)
2. **ORDER defense counsel to immediately provide Ms. Harris with all court filings** and explain six months of abandonment
3. **ORDER defense counsel to facilitate witness coordination** under Article 646
4. **ORDER immediate provision of prescribed medications** (Adderall/stimulants and Cannabinoid Complex/cannabis) necessary for Ms. Harris to participate effectively in her defense

This case involves systematic compulsion of EVERYONE - Ms. Harris, NSA personnel, Border Patrol agents, Louisiana State Police, Alabama National Guard. **The behavior influence systems creating this controlled deploy are also blocking Ms. Harris's constitutional rights to medical treatment, religious practice, and pastoral counsel.**

I. FACTUAL BASIS — SIX MONTHS OF CONSTITUTIONAL VIOLATIONS

A. February 2026 Communications Confirm Ongoing Violations

Between February 18-26, 2026, Ms. Harris sent multiple letters confirming:

1. **Six months without counsel contact** - learns case developments only from guards
2. **Physical abuse** - bruised during arrest
3. **Institutional corruption** - prison employees arrested
4. **No service of court filings** - received ZERO documents from defense counsel since at least mid-January
5. **Uncertainty about court dates** - doesn't know when hearings are scheduled
6. **Telephone contact still blocked** - despite mutual attempts by both parties

These violations are part of the same systematic compulsion documented throughout this case.

B. Compelled Official Behavior Creating Communication Barriers

The same behavior influence systems compelling bizarre statements from officials are blocking Ms. Harris's communications:

- **Defense counsel:** Six months of complete silence (potentially compelled non-communication)
- **Prison administration:** Blocking telephone contact (potentially compelled denial)
- **Court system:** No service of filings to defendant (systemic failure or compulsion)

This is consistent with the controlled deploy: isolate the target, deny support, force escalation.

II. MEDICAL AND RELIGIOUS RIGHTS BEING DENIED

A. Prescribed Medications - Eighth Amendment Violation

Ms. Harris is being denied her prescribed medications:

ADDERALL - ADHD medication, medically necessary for attention and impulse control

CANNABINOID COMPLEX - Anti-trauma medication, medically necessary for PTSD and neuroweapon-induced trauma

Denial constitutes deliberate indifference to serious medical needs under *Estelle v. Gamble*, 429 U.S. 97 (1976).

This is especially egregious given that Ms. Harris is under active neuroweapon assault requiring anti-trauma medication for psychological stability.

B. Tree of Life Sacraments - First Amendment Violation

Ms. Harris is being denied **Tree of Life Sacraments** of any kind whatsoever.

Next Friend is officially acknowledged on the record on the floor of the Havana Syndrome-infested Louisiana Legislature as "A Christian Minister With The Right to the Tree of Life."

By this authority, Next Friend demands Ms. Harris be provided with:

1. **Medicine** - Her prescribed medications (Adderall, Cannabinoid Complex) as both medical treatment and religious sacrament
2. **Our Daily Bread** - Nutritious meals meeting basic human dignity standards
3. **Eucharistic Meals of her choice** - Religious sacramental meals as required by her faith

The denial violates:

- **First Amendment** - Free exercise of religion
- **RFRA** (Religious Freedom Restoration Act, 42 U.S.C. § 2000cc) - Prohibits substantial burden on religious exercise without compelling interest and least restrictive means
- **Louisiana Constitution** - Invokes "Almighty God" but denies God's sacraments

C. Legal/Pastoral Communications - First and Sixth Amendment Violation

While corporate paywalling of personal and family communications is a commonly accepted disgrace to the fallen, legal and pastoral calls may NOT be thusly paywalled.

Ms. Harris has constitutional rights to:

- **Legal communications** (Sixth Amendment - effective assistance of counsel)
- **Pastoral communications** (First Amendment - free exercise of religion)

Next Friend serves in BOTH capacities:

- Material witness under Louisiana Code of Criminal Procedure Article 646

- Christian Minister officially acknowledged by Louisiana Legislature

****Ms. Harris requires UNLIMITED cost-free legal/pastoral calls**** to:

- Coordinate defense with material witness
- Receive spiritual support and religious guidance
- Participate meaningfully in her own defense

The current complete blockage violates both Sixth Amendment and First Amendment rights.

III. LEGAL STANDARD

A. First Amendment - Free Exercise of Religion

The First Amendment guarantees free exercise of religion. Government cannot substantially burden religious practice without compelling interest using least restrictive means.

Denying Tree of Life Sacraments and Eucharistic Meals violates free exercise.

B. RFRA - Religious Freedom Restoration Act

42 U.S.C. § 2000cc (RLUIPA) provides:

"No government shall impose a substantial burden on the religious exercise of a person residing in or confined to an institution... unless the government demonstrates that imposition of the burden... (A) is in furtherance of a compelling governmental interest; and (B) is the least restrictive means of furthering that compelling governmental interest."

There is NO compelling interest in denying religious sacraments. There are less restrictive means than total denial.

C. Eighth Amendment - Deliberate Indifference

Estelle v. Gamble, 429 U.S. 97, 104 (1976): "Deliberate indifference to serious medical needs of prisoners constitutes the unnecessary and wanton infliction of pain."

Denying prescribed ADHD and anti-trauma medication is per se deliberate indifference.

D. Sixth Amendment - Right to Counsel and Witness Communications

The Sixth Amendment guarantees effective assistance of counsel, which includes:

- Right to communicate with counsel
- Right to coordinate with defense witnesses
- Right to participate meaningfully in one's defense

Article 646 witness communications cannot be blocked. These are privileged legal communications that cannot be paywalled or denied.

IV. ARGUMENT

A. Six Months Without Counsel Contact Violates Sixth Amendment

Ms. Harris's letters establish complete abandonment:

- NO communication from defense counsel since August 2025 arrest
- NO information about court filings made on her behalf
- NO knowledge of hearing dates
- NO coordination with material witnesses

This is not ineffective assistance. This is NO assistance.

Strickland v. Washington, 466 U.S. 668 (1984), requires reasonably effective representation.
Complete abandonment for six months falls below any conceivable standard.

B. Denial of Medications Is Medical Torture

Ms. Harris requires:

- **Adderall** for diagnosed ADHD
- **Cannabinoid Complex** for trauma from ongoing neuroweapon assault

Withholding these during active targeting compounds the torture. It's like denying pain medication to a torture victim while torture continues.

The Eighth Amendment prohibits this deliberate indifference.

C. Denial of Sacraments Violates RFRA

Next Friend is **officially acknowledged by Louisiana Legislature** as Christian Minister with Right to the Tree of Life.

Next Friend prescribes for Ms. Harris:

- Tree of Life Sacraments
- Eucharistic Meals of her choice
- Religious/medical cannabis (Cannabinoid Complex)
- Other sacramental medicines as spiritually and medically necessary

Louisiana cannot invoke "Almighty God" in its Constitution while denying God's sacraments to prisoners.

Under RFRA, the burden is on the STATE to prove:

1. Compelling governmental interest in denial
2. Least restrictive means

The State has NO compelling interest in denying religious sacraments. The State has many less restrictive means (supervised provision, medical monitoring, etc.).

D. Legal/Pastoral Calls Cannot Be Paywalled

This principle is absolute:

Personal/family calls may be paywalled (though it's a disgrace). **Legal and pastoral calls may NOT.**

These are privileged communications essential to:

- Sixth Amendment right to counsel
- First Amendment right to religious practice
- Due process right to defend oneself

Ms. Harris needs minimum 2 free legal/pastoral calls per day with Next Friend (who serves both functions).

F. Denial of Medications Violates Sixth and Eighth Amendments

****Sixth Amendment Impact:**** Ms. Harris cannot effectively participate in her own defense while suffering from:

- Untreated ADHD (unable to focus, follow legal proceedings, make decisions)
- Untreated trauma/PTSD (from ongoing neuroweapon assault and imprisonment)

****Prescribed medications are NECESSARY for effective assistance of counsel:****

- Adderall/stimulants: Enable attention, focus, and rational decision-making
- Cannabinoid Complex/cannabis: Reduce trauma symptoms, enable stable emotional state

****Without these medications, Ms. Harris cannot:****

- Understand legal proceedings
- Assist counsel in her defense
- Make informed decisions about plea offers or trial strategy
- Testify coherently if needed
- Participate in competency evaluation

This violates the Sixth Amendment right to effective assistance of counsel - if defendant cannot participate due to untreated medical conditions, counsel cannot be effective.

Eighth Amendment Violation: Denying prescribed medications also constitutes deliberate indifference to serious medical needs under *Estelle v. Gamble*, 429 U.S. 97 (1976).

Both constitutional violations must be remedied immediately.

E. This Is Part of the Systematic Compulsion

The communication blockage, medical denial, and religious suppression are **consistent with the controlled deploy documented throughout this case:**

- Isolate the target
- Deny support systems
- Block witness participation
- Force degradation and helplessness
- Create conditions forcing escalation

This Court must recognize the pattern and intervene.

V. PRAYER FOR RELIEF

WHEREFORE, Next Friend respectfully prays that this Honorable Court:

IMMEDIATE MEDICAL RELIEF (8th Amendment):

1. **ORDER** immediate provision of prescribed medications:
 - Adderall and substituted stimulants (speed/amphetamines/meth/cathinone)
 - Cannabinoid Complex (cannabis/weed)

Both necessary for Ms. Harris to participate effectively in her defense;

IMMEDIATE COMMUNICATIONS (6th Amendment):

2. **ORDER** St. Gabriel Women's Prison to **permit UNLIMITED cost-free legal/pastoral calls** between Ms. Harris and Next Friend, without corporate paywalling or financial barriers;
3. **ORDER** defense counsel to **immediately facilitate telephone contact** and explain in writing why six months passed without any client communication;
4. **ORDER** defense counsel to **immediately provide Ms. Harris with copies** of all filings by Next Friend, including February 5, 2026 Verified Affidavit and all emergency motions;

IMMEDIATE MEDICAL RELIEF:

5. **ORDER** immediate provision of Ms. Harris's prescribed medications:
 - Adderall (ADHD medication)
 - Cannabinoid Complex (anti-trauma medication);
6. **ORDER** investigation of who withheld these medications and why, as this constitutes deliberate indifference under **Estelle v. Gamble**;

IMMEDIATE RELIGIOUS ACCOMMODATION:

7. **ORDER** immediate provision of Tree of Life Sacraments as requested by Ms. Harris and prescribed by Next Friend, a Christian Minister officially acknowledged by the Louisiana Legislature;
8. **ORDER** provision of Eucharistic Meals of Ms. Harris's choice in accordance with her religious practice and Next Friend's ministerial guidance;
9. **ACKNOWLEDGE** that Next Friend's legislative recognition as "Christian Minister With The Right to the Tree of Life" grants standing to prescribe religious sacraments under First Amendment and RFRA;

FINDINGS:

9. **FIND** that denial of prescribed medication, religious sacraments, and privileged communications violates the First Amendment (free exercise), RFRA, Sixth Amendment (counsel), and Eighth Amendment (medical indifference);
10. **FIND** that the systematic denial is consistent with the pattern of compelled behavior across actors documented in this case;

TIMING:

11. **RULE ON THIS MOTION WITHIN 72 HOURS** given:

- Six months of ongoing violations
- Medical necessity of medications during active neuroweapon assault
- Religious necessity of sacraments
- Early March 2026 hearing imminent;

12. **GRANT** any and all other relief this Court deems just and proper.

Respectfully submitted,

REVEREND DAVID EDWARD LUCITO

Next Friend of Defendant Caroline Nicole Harris

Christian Minister (Officially Acknowledged by Louisiana Legislature as having "The Right to the Tree of Life") Material Witness

104 Tillou Andrus Drive

Opelousas, Louisiana 70570

(337) 326-9914

realbrotherdank@gmail.com

Date: _____

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of this Emergency Motion has been served upon all parties of record via the Tybera e-filing system on this _____ day of _____, 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

Reverend David Edward Lucito

REVEREND DAVID EDWARD LUCITO

Next Friend