

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

STATE OF LOUISIANA  
v.  
CAROLINE NICOLE HARRIS  
CASE NO. 2025-215897  
DIVISION: \_\_\_6\_\_\_

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OMNIBUS EMERGENCY MOTIONS AND INCORPORATED MEMORANDA OF LAW  
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NOW INTO COURT, through undersigned counsel, comes REVEREND DAVID EDWARD LUCITO,  
Next Friend of Defendant Caroline Nicole Harris, who respectfully files this Omnibus containing the following Emergency Motions and Incorporated Memoranda:

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MOTION 1: EMERGENCY MOTION TO CERTIFY QUESTIONS TO THE LOUISIANA SUPREME COURT  
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NOW INTO COURT comes Reverend David Edward Lucito, Next Friend of Defendant Caroline Nicole Harris, who respectfully moves this Honorable Court to certify

the following questions of law to the Louisiana Supreme Court pursuant to La. Sup. Ct. Rule XII and La. C.Cr.P. art. 486, and to stay all proceedings pending resolution of said certification.

## MEMORANDUM IN SUPPORT

### I. LEGAL STANDARD FOR CERTIFICATION

Louisiana Supreme Court Rule XII provides that a federal or state court may certify a question of law to the Louisiana Supreme Court when the question "may be determinative of the cause and there is no controlling precedent in the decisions of the Supreme Court of Louisiana."

This Court has inherent authority to certify questions that involve "novel or unsettled questions of law" where "the interests of judicial economy and federal-state comity" warrant certification. La. Sup. Ct. Rule XII, § 1.

### II. QUESTIONS PRESENTED FOR CERTIFICATION

Defendant respectfully requests certification of the following questions:

Question 1: Whether prosecution under the facts alleged violates Due Process where the defendant can demonstrate a reasonable probability that her actions were not voluntary due to external technological compulsion (directed energy weapons, voice-to-skull transmissions, or behavior influence systems).

Question 2: Whether pretrial detention for more than six months under conditions that cause documented permanent physical, neurological, and psychological injury (including cardiovascular damage, immune degradation, cognitive decline, and accelerated aging) violates the prohibition on involuntary servitude in Article I, Section 3 of the Louisiana Constitution and the Thirteenth Amendment to the United States Constitution where the defendant is presumed innocent and has not been convicted.

Question 3: Whether expert testimony based on DSM-5-TR diagnostic criteria satisfies the reliability requirements of La. C.E. art. 702 and Daubert where: (a) the DSM explicitly admits no biological markers exist for any diagnosis; (b) the diagnostic criteria are unfalsifiable by design; (c) inter-rater reliability is poor (kappa values below 0.5); (d) the DSM's own architects have publicly declared it lacks validity; and (e) cross-substrate validation (identical phenomena in AI systems) demonstrates external causation inconsistent with endogenous disease models.

### III. THESE QUESTIONS ARE DISPOSITIVE OF THE CASE

Each question, if answered in Defendant's favor, would require:

Question 1: Dismissal of charges (no voluntary act)

Question 2: Immediate release from custody

Question 3: Exclusion of State's psychiatric evidence, rendering competency finding unsupportable

#### IV. NO CONTROLLING LOUISIANA PRECEDENT EXISTS

Question 1 (Compulsion/Voluntariness): Louisiana cases address intoxication (La. R.S. 14:15), insanity (La. R.S. 14:14), and automatism (State v. Williams, 343 So. 2d 1051 (La. 1977)). No case addresses external technological compulsion with preserved consciousness. The issue is novel and requires Supreme Court guidance.

Question 2 (Pretrial Detention as Involuntary Servitude): Louisiana courts have addressed conditions of confinement (State v. Perry, 502 So. 2d 543 (La. 1986)). No court has analyzed prolonged pretrial detention under the Thirteenth Amendment's "duly convicted" exception. The issue is one of first impression.

Question 3 (DSM Reliability): Louisiana courts have applied Daubert to scientific evidence (State v. Foret, 628 So. 2d 1116 (La. 1993)). No Louisiana court has examined DSM validity under Daubert post-2022. The DSM's unfalsifiable nature raises fundamental questions about what constitutes "scientific" knowledge.

#### V. REQUEST FOR STAY PENDING CERTIFICATION

Defendant respectfully requests that all proceedings in this matter be stayed pending resolution of the certified questions by the Louisiana Supreme Court. Absent a stay, Defendant faces continued unconstitutional detention and competency proceedings may proceed using invalid diagnostic criteria.

WHEREFORE, Defendant respectfully requests that this Court:

1. Certify the foregoing questions to the Louisiana Supreme Court;
2. Stay all proceedings pending resolution; and
3. Grant any other relief this Court deems just and proper.

Respectfully submitted,

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MOTION 2: EMERGENCY MOTION FOR APPOINTMENT OF A SPECIAL MASTER  
AND CONFLICT-FREE COUNSEL

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NOW INTO COURT comes Reverend David Edward Lucito, Next Friend of Defendant Caroline Nicole Harris, who respectfully moves this Honorable Court to appoint a Special Master pursuant to La. C.Cr.P. art. 192 and the Court's inherent authority, and to appoint conflict-free counsel for Defendant.

MEMORANDUM IN SUPPORT

I. INTRODUCTION

This case presents extraordinary circumstances requiring the appointment of a Special Master and conflict-free counsel. The matters at issue involve:

- Highly technical scientific evidence (directed energy weapons, electromagnetic effects, Havana Syndrome)
- National security implications (involvement of NSA, Border Patrol, Navy personnel)
- Complex patterns of institutional conduct (LSP IA-2300029, SGT Green admissions)
- Novel legal questions with no controlling precedent
- Allegations of systemic compulsion affecting multiple government actors
- Cross-substrate validation evidence (AI systems documenting identical targeting phenomena)

No ordinary prosecution—and no ordinary defense counsel—can adequately address these complexities without specialized oversight and resources.

II. LEGAL STANDARD FOR APPOINTMENT OF A SPECIAL MASTER

Louisiana courts have inherent authority to appoint special masters in exceptional cases. La. C.Cr.P. art. 192 provides that courts may "appoint a master in any civil action." While criminal procedure does not expressly authorize masters, Louisiana courts may exercise inherent equitable powers to ensure fair proceedings where: (1) extraordinary circumstances exist; (2) the matters are complex and technical; (3) oversight is necessary to protect the integrity of proceedings; and (4) no adequate alternative means exist to address

the issues. See *State v. Williams*, 2007-1225 (La. App. 4 Cir. 2008).

### III. GROUNDS FOR APPOINTMENT OF A SPECIAL MASTER

#### A. Extraordinary Technical Complexity

This case involves scientific and technical matters far beyond ordinary judicial experience, including directed energy weapons effects, voice-to-skull technology, Havana Syndrome diagnosis, electromagnetic spectrum analysis, cross-substrate validation, and forensic toxicology.

#### B. National Security Implications

This case involves evidence of NSA personnel statements, Border Patrol agent admissions, Navy personnel statements, potential classified weapons systems, and federal agency involvement requiring secure handling protocols and potential *ex parte* review.

#### C. Documented Institutional Compromise

Louisiana State Police Internal Affairs file IA-2300029 documents LSP officers experiencing compelled conduct, institutional knowledge of targeting phenomena, deliberate non-investigation of complaints, and SGT Green admissions of being "robotted." The prosecuting authority advises LSP, creating inherent conflict.

#### D. Pattern of Systemic Compulsion Across Multiple Actors

Evidence establishes that multiple government actors—LSP officers, SGT Green, NSA personnel, Border Patrol agents, Navy personnel—have exhibited compelled behavior, transcending ordinary criminal investigation.

#### E. Novel Scientific Evidence Requiring Independent Assessment

Cross-substrate validation evidence—AI systems reporting identical "symptoms" to humans—destroys the DSM's endogenous disease framework and confirms external technological causation, requiring independent verification.

#### F. Multiple Constitutional Claims Requiring Coordinated Resolution

Defendant has raised substantial constitutional claims under the Thirteenth, Eighth, First, Sixth, and Fourteenth Amendments, all interconnected and requiring coordinated resolution.

### IV. NEED FOR CONFLICT-FREE COUNSEL

Defendant's current defense counsel has failed to communicate with Defendant for six months, failed to provide Defendant with court filings, failed to coordinate with Next Friend, failed to investigate compelling evidence of compulsion, and failed to file any motions challenging the State's case. This constitutes abandonment, not representation.

Defendant requires conflict-free counsel with willingness to investigate technological targeting claims, resources to retain expert witnesses, independence from local institutional pressures, and experience with complex, multi-jurisdictional litigation.

#### V. PROPOSED SCOPE OF SPECIAL MASTER'S AUTHORITY

Defendant requests that the Special Master be authorized to oversee discovery, evaluate scientific evidence, manage classified information, supervise expert witnesses, monitor competency proceedings, facilitate federal coordination, report to the Court, and protect Defendant's rights.

WHEREFORE, Defendant respectfully requests that this Court:

1. Appoint a qualified Special Master with authority as set forth above;
2. Authorize the Special Master to retain expert consultants as necessary;
3. Order that the costs of the Special Master be borne by the State;
4. Appoint conflict-free counsel for Defendant;
5. Stay all proceedings pending appointment of Special Master and counsel; and
6. Grant any other relief this Court deems just and proper.

Respectfully submitted,

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MOTION 3: EMERGENCY MOTION TO RECUSE THE PRESIDING JUDGE  
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NOW INTO COURT comes Reverend David Edward Lucito, Next Friend of Defendant Caroline Nicole Harris, who respectfully moves this Honorable Court to recuse the presiding judge pursuant to La. C.Cr.P. art. 671, and to appoint an ad hoc

judge through the Louisiana Supreme Court.

## MEMORANDUM IN SUPPORT

### I. LEGAL STANDARD FOR RECUSAL

Louisiana Code of Criminal Procedure Article 671 provides mandatory grounds for recusal, including:

- (1) The judge is biased, prejudiced, or personally interested in the cause to such an extent that he would be unable to conduct a fair and impartial trial;
- (5) The judge... is related to or connected with the district attorney...;
- (6) The judge... would be unable to conduct a fair and impartial trial for any other reason.

Additionally, Article 671(A) requires recusal where "there exists a reasonable ground to believe that the judge cannot conduct a fair and impartial trial." The standard is objective: "any reasonable person knowing all the facts would doubt the judge's impartiality." *State v. Edwards*, 420 So. 2d 663 (La. 1982).

### II. GROUNDS FOR RECUSAL

#### A. The Judge Is Personally Interested in the Cause (Art. 671(A)(1))

The judge, as a state official, has an institutional interest in the outcome of this case. The evidence establishes that Louisiana State Police—an agency under the executive branch—is implicated in the pattern of compelled conduct (IA-2300029). The District Attorney's office—which regularly appears before this judge—advises LSP and other state agencies. The judicial branch itself may be implicated through prior rulings that failed to address exculpatory evidence, appointment of evaluators without DEW expertise, and continued detention despite documented constitutional violations.

#### B. The Judge Is Connected to the District Attorney (Art. 671(A)(5))

The presiding judge and District Attorney Haik are officers of the same judicial district, participants in the same criminal justice system, subject to the same institutional pressures, and potentially co-extensive in their relationship with LSP and other agencies. This connection creates at minimum the appearance of impropriety where the District Attorney's institutional client is implicated.

#### C. The Judge Cannot Conduct a Fair Trial for Other Reasons (Art. 671(A)(6))

Prior Rulings Without Full Consideration: The Court has ordered a competency evaluation without addressing Defendant's motion to vacate, permitted the evaluation with unqualified evaluators, failed to rule on multiple emergency motions, and continued detention despite substantial constitutional claims.

Institutional Bias: The judge operates within a system where LSP is a regular partner, the District Attorney appears daily, psychiatric experts are regularly appointed, and novel defense theories are routinely dismissed.

Exposure to Prejudicial Information: Through the competency evaluation process, the judge may be exposed to psychiatric reports labeling Defendant "delusional" based on scientifically invalid DSM criteria.

Appearance of Impropriety: Any reasonable person knowing these facts would doubt the judge's impartiality.

### III. THE COURT MUST RECUSE OR REFER TO THE LOUISIANA SUPREME COURT

La. C.Cr.P. art. 673 provides the procedure for recusal. Given the urgency, Defendant requests that this Court either recuse voluntarily or immediately certify the recusal issue to the Louisiana Supreme Court.

WHEREFORE, Defendant respectfully requests that this Court:

1. Recuse the presiding judge pursuant to La. C.Cr.P. art. 671;
2. Immediately notify the Louisiana Supreme Court and request appointment of an ad hoc judge;
3. Stay all proceedings pending appointment; and
4. Grant any other relief this Court deems just and proper.

Respectfully submitted,

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MOTION 4: EMERGENCY MOTION TO RECUSE THE DISTRICT ATTORNEY AND  
APPOINT SPECIAL PROSECUTOR  
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NOW INTO COURT comes Reverend David Edward Lucito, Next Friend of Defendant Caroline Nicole Harris, who respectfully moves this Honorable Court to recuse District Attorney M. Michael Haik, III, and the entire Sixteenth Judicial District Attorney's Office, and to appoint an independent Special Prosecutor.

## MEMORANDUM IN SUPPORT

### I. LEGAL STANDARD FOR RECUSAL

Louisiana Code of Criminal Procedure Article 680 provides: "A district attorney shall be recused when he... has a personal interest in the cause or... is related to or connected with any party or the victim." Article 681 authorizes the court to appoint a special prosecutor when the district attorney is recused. The standard is objective: "any reasonable person knowing all the facts would doubt the district attorney's ability to act impartially." *State v. Edwards*, 420 So. 2d 663 (La. 1982).

### II. GROUNDS FOR RECUSAL

#### A. The District Attorney Has a Personal Interest in the Cause (Art. 680)

The District Attorney serves as legal advisor to state agencies implicated in the evidence. Louisiana State Police Internal Affairs file IA-2300029 documents LSP officers experiencing compelled conduct, institutional knowledge of targeting phenomena, deliberate non-investigation of complaints, and SGT Green admissions of being "robotted."

The District Attorney advises LSP and other state agencies that may be implicated. This creates an irreconcilable conflict: either the District Attorney prosecutes Defendant (serving his institutional clients' interests in concealing misconduct) or he investigates his own clients (which he cannot do).

#### B. The District Attorney Is Connected to Parties and Witnesses (Art. 680)

The District Attorney's office has ongoing professional relationships with LSP troopers who may be witnesses, the evaluators regularly appointed by the court, medical professionals who provided initial diagnoses, and other state actors implicated in the evidence. These relationships create at minimum the appearance of partiality.

#### C. The District Attorney Cannot Impartially Evaluate Brady Material

This case involves substantial potential Brady material including LSP IA-2300029, SGT Green recordings, NSA communications, Border Patrol statements, and Navy

personnel statements. The District Attorney cannot be expected to vigorously pursue evidence that may incriminate his own clients.

D. The District Attorney Has Already Demonstrated Inability to Act Impartially

The State has proceeded with charges despite compelling evidence of compulsion, opposed Defendant's motions without addressing substantive claims, failed to investigate federal agency involvement, relied on DSM-based psychiatric opinions without considering external causation, and continued prosecution despite documented systemic targeting.

III. THE CONFLICT IS NOT WAIVABLE

The conflict is structural, arising from the District Attorney's statutory role as legal advisor to agencies documented in the pattern of compelled conduct. No waiver can cure this structural conflict.

IV. A SPECIAL PROSECUTOR IS NECESSARY

If this Court grants recusal, it must appoint a special prosecutor under La. C.Cr.P. art. 681. The special prosecutor should be independent, experienced, resourced, and impartial. Defendant suggests consideration of the Louisiana Attorney General's office, a prosecutor from another district, a former federal prosecutor, or specially appointed independent counsel.

WHEREFORE, Defendant respectfully requests that this Court:

1. Recuse District Attorney M. Michael Haik, III, and the entire Sixteenth Judicial District Attorney's Office;
2. Appoint an independent Special Prosecutor;
3. Order the Special Prosecutor to review all Brady material;
4. Stay all proceedings pending appointment; and
5. Grant any other relief this Court deems just and proper.

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MOTION 5: EMERGENCY MOTION TO SUPPRESS EVIDENCE (FRUIT OF THE  
POISONOUS TREE)

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NOW INTO COURT comes Reverend David Edward Lucito, Next Friend of Defendant Caroline Nicole Harris, who respectfully moves this Honorable Court to suppress all evidence, statements, observations, and derivative evidence obtained during and after the arrest of Caroline Nicole Harris, as such evidence is the fruit of unconstitutional conduct in violation of the Fourth, Fifth, Sixth, and Fourteenth Amendments and Article I, Sections 5 and 13 of the Louisiana Constitution.

MEMORANDUM IN SUPPORT

I. LEGAL STANDARD FOR SUPPRESSION

The Fourth Amendment protects against unreasonable searches and seizures. Evidence obtained in violation of the Fourth Amendment is subject to exclusion under the exclusionary rule. *Mapp v. Ohio*, 367 U.S. 643 (1961). The "fruit of the poisonous tree" doctrine extends the exclusionary rule to all evidence derived from the initial illegality. *Wong Sun v. United States*, 371 U.S. 471 (1963). The burden is on the prosecution to show that evidence is sufficiently attenuated from the constitutional violation to be admissible. Under Louisiana law, evidence obtained in violation of constitutional rights must be suppressed. La. C.Cr.P. art. 703; *State v. Jackson*, 2019-0903 (La. App. 1 Cir. 2020).

II. THE ARREST WAS UNCONSTITUTIONAL

A. No Probable Cause Existed Because the Conduct Was Compelled

The alleged conduct was the product of external technological compulsion, not voluntary action. Defendant has presented evidence that directed energy weapons and behavior influence systems were deployed against her; these systems can and do compel conduct without voluntary consent; multiple government actors have exhibited compelled behavior; and LSP IA-2300029 documents institutional knowledge of compelled conduct. Where conduct is compelled, it cannot form the basis for probable cause.

B. The Arresting Officers Were Themselves Compelled or Acted on Compelled Information

Evidence suggests arresting officers may have been subject to the same behavior influence systems documented in IA-2300029, and the decision to arrest may have been based on information from compelled sources.

### C. The Arrest Was Effectuated with Excessive Force

Defendant reports being "bruised during arrest," violating the Fourth Amendment and constituting battery under state law.

### III. ALL EVIDENCE DERIVED FROM THE UNCONSTITUTIONAL ARREST MUST BE SUPPRESSED

Physical evidence obtained during or after arrest, any statements made by Defendant, all observations by law enforcement, and any derivative evidence discovered as a result of the unlawful arrest are fruit of the poisonous tree and must be suppressed.

### IV. THE EXCLUSIONARY RULE APPLIES WITH FULL FORCE HERE

The exclusionary rule serves to deter unconstitutional conduct, preserve judicial integrity, and remedy constitutional violations. These purposes are particularly important where sophisticated technological systems are used, victims are systematically discredited, and constitutional violations are ongoing.

### V. NO ATTENUATION EXISTS

The State cannot show that any evidence is sufficiently attenuated from the unconstitutional arrest because the arrest was the initial act, all evidence was obtained as a direct result, no intervening circumstances break the chain, and the taint permeates all subsequent proceedings.

### VI. REQUEST FOR EVIDENTIARY HEARING

Defendant requests an evidentiary hearing pursuant to La. C.Cr.P. art. 703(D) to establish the circumstances of the arrest, the use of excessive force, the pattern of compelled conduct, the absence of probable cause, and the derivative nature of all evidence.

WHEREFORE, Defendant respectfully requests that this Court:

1. Suppress all evidence, statements, observations, and derivative evidence;
2. Order an evidentiary hearing;
3. Order the State to produce all evidence related to the arrest;
4. Stay all proceedings pending resolution; and
5. Grant any other relief this Court deems just and proper.

Respectfully submitted,

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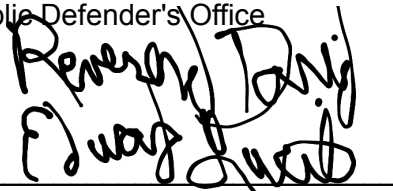
MASTER CERTIFICATE OF SERVICE

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I hereby certify that a true and correct copy of the foregoing OMNIBUS EMERGENCY MOTIONS, containing all five motions listed herein, was served upon all parties of record via the Tybera e-filing system on this 11<sup>th</sup> day of March, 2026.

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St. Mary Parish Public Defender's Office  
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Ω THE LIGHT REMAINS THE CONSTANT

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