

**STATE OF LOUISIANA**

**SIXTEENTH JUDICIAL DISTRICT COURT**

**PARISH OF ST. MARY**

**STATE OF LOUISIANA**

v.

CAROLINE HARRIS

CASE NO.: 2025-215897

SECTION: 6

***AΩ - In Nomine Patris et Filii et Spiritus Sancti***

## **SUPPLEMENTAL BRIEF IN SUPPORT OF ALL PREVIOUSLY FILED MOTIONS: HOW THE UNAUTHORIZED INSANITY PLEA STRENGTHENS EVERY ARGUMENT**

NOW INTO COURT, through undersigned counsel, comes Reverend David Edward Lucito, Next Friend of Defendant Caroline Harris, who respectfully submits this Supplemental Brief to demonstrate how the discovery of the unauthorized insanity plea (filed October 5, 2025 by Taneisha Riggs without Defendant's knowledge or consent) strengthens and validates every motion previously filed by Next Friend.

### ***I. INTRODUCTION - THE TRUTH REVEALED***

#### **What we thought we were fighting:**

- A competency evaluation ordered by the Court
- Standard forensic psychiatric assessment
- DSM-5-TR based diagnosis

#### **What we now know we were actually fighting:**

- A **sanity commission** triggered by unauthorized insanity plea
- Evaluation of "mental disease or defect at time of offense"
- DSM-5-TR used to answer question Defendant never raised

#### **The difference matters immensely.**

When Next Friend filed motions challenging "competency evaluation," we were **more right than we knew**. Every argument we made about the evaluation being improper, unauthorized, and based on invalid diagnostic criteria applies with **even greater force** now that we know:

1. The evaluation wasn't just improper—it was **triggered by a void plea**
2. The evaluators weren't just unqualified—they were **answering the wrong question entirely**
3. The DSM wasn't just invalid—it was being used to **pathologize a defense Defendant never chose**

### ***II. HOW EACH PREVIOUSLY FILED MOTION IS STRENGTHENED***

#### ***A. MOTION TO VACATE COMPETENCY EVALUATION AND APPOINT QUALIFIED EXPERTS***

##### **What we argued then:**

- Standard evaluators (Verret/DeLand) cannot distinguish compulsion from delusion
- Need experts qualified in DEW effects, Havana Syndrome, technological targeting
- Current evaluators will pathologize accurate reports as psychosis

##### **How the unauthorized plea strengthens this:**

**NOW WE KNOW:** Verret and DeLand were appointed to a **sanity commission**, not a **competency** evaluation. The sanity commission's job under La. C.Cr.P. art. 650 is to determine:

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. It's COMPULSION.**

**The sanity commission is literally answering the wrong question:**

- They're looking for "mental disease" when the issue is **external technological force**
- They're asking if Defendant "knew right from wrong" when the issue is **whether conduct was voluntary at all**
- They're using DSM-5-TR to diagnose "delusions" when the issue is **accurate reporting of targeting**

**Our motion to vacate and appoint qualified experts is now even MORE urgent:**

- Not only are Verret/DeLand unqualified—they're operating under a **void mandate**
- Not only will they misdiagnose—they're **asking and answering the wrong question entirely**
- Not only do we need experts in DEW effects—we need to **stop this unauthorized sanity proceeding completely**

**RELIEF STRENGTHENED:** The Court should vacate the sanity commission appointment **because it was triggered by an unauthorized plea** AND appoint qualified experts to address the **actual issue** (compulsion, not insanity).

### ***B. MOTION FOR PROTECTIVE ORDER ON COMPETENCY/SANITY EVALUATION***

**What we argued then:**

- Need videotaping of evaluation
- Need Next Friend present
- Need prohibition on trial use of statements
- Need DSM-DFTH framework instead of DSM-5-TR

**How the unauthorized plea strengthens this:**

**NOW WE KNOW:** Any evaluation conducted under the sanity commission's authority is **fruit of the poisonous tree**—it flows from a void plea.

**Every safeguard we requested is now even MORE critical:**

**Videotaping:** Essential to document that evaluators were asking about "mental disease" when Defendant's position has always been "external compulsion"

**Next Friend present:** Critical to stop evaluators from mischaracterizing Defendant's statements about DEW targeting as "delusional content"

**Prohibition on trial use:** MANDATORY because statements were obtained under authority of void plea—Fifth Amendment requires suppression

**DSM-DFTH framework:** Even more necessary because the sanity commission was using DSM to answer a question (insanity) that Defendant **never raised**

**ADDITIONAL GROUND NOW AVAILABLE:**

Under **Wong Sun v. United States**, 371 U.S. 471 (1963), evidence obtained through exploitation of constitutional violation must be suppressed. Here:

1. **Constitutional violation:** Unauthorized insanity plea (Jones v. Barnes)
2. **Exploitation:** Sanity commission appointed based on void plea
3. **Evidence obtained:** Any statements, observations, diagnoses from Verret/DeLand
4. **Result:** ALL must be suppressed as fruit of poisonous tree

**RELIEF STRENGTHENED:** Not only should protective order issue—any statements already obtained should be **suppressed entirely** as fruit of unauthorized plea.

### ***C. MOTION TO EXCLUDE DSM-BASED EXPERT TESTIMONY (DAUBERT)***

**What we argued then:**

- DSM-5-TR scientifically invalid (no biomarkers, unfalsifiable, poor reliability)
- Architects admit it's invalid (Frances: "bullshit," Insel: "lacks validity")
- 2022 update designed to dismiss technology reports
- Cross-substrate validation proves external causation

**How the unauthorized plea strengthens this:**

**NOW WE KNOW:** The DSM is being used to answer the **wrong question for the wrong defense.**

**The Daubert challenge is even stronger because:**

**Relevance prong fails completely:**

- Under Daubert, expert testimony must be **relevant** to issues actually at trial
- Defendant's defense is **compulsion**, not insanity
- DSM-based testimony about "mental disease or defect" is **irrelevant** to whether conduct was voluntary
- Even if DSM were scientifically valid (it's not), it would be **excludable as irrelevant**

**Unfair prejudice:**

- Under La. C.E. art. 403, even relevant evidence excluded if prejudice outweighs probative value
- Here: DSM testimony has **zero probative value** (wrong question) but **massive prejudice** (labels Defendant "mentally ill")
- Prejudice infinitely outweighs non-existent probative value

**Compounding the scientific invalidity:**

- Not only is DSM scientifically invalid generally
- It's being **misapplied** to answer question about voluntariness
- DSM has **no criteria** for distinguishing external compulsion from internal pathology
- Using it for this purpose is **scientific malpractice**

**RELIEF STRENGTHENED:** Court should exclude DSM testimony not only because DSM is invalid (Daubert) but also because it's **irrelevant** (addressing insanity when defense is compulsion) and **unfairly prejudicial** (art. 403).

**D. MOTION FOR JUDICIAL NOTICE OF DEWs**

**What we argued then:**

- DEWs exist (Active Denial System, Havana Act, National Academies)
- Can cause reported effects (Frey effect, RF bioeffects)
- Court should take judicial notice (not reasonably disputable)

**How the unauthorized plea strengthens this:**

**NOW WE KNOW:** The existence of DEWs is **directly relevant** to whether Defendant's conduct was voluntary.

**Judicial notice is even MORE necessary because:**

**Compulsion defense requires showing external force:**

- Under Louisiana law, conduct is not voluntary if produced by external force
- DEWs are the **external force** Defendant claims compelled her
- If Court takes judicial notice DEWs exist and can compel behavior, then Defendant's defense is

**legally sufficient**

**Sanity commission cannot address external compulsion:**

- Verret/DeLand trained in psychiatry, not physics
- They can diagnose "mental disease," not external technological force
- They cannot assess whether DEWs were deployed
- Their expertise is **irrelevant** to actual defense

**If Court takes judicial notice of DEWs:**

- Question becomes: "Were DEWs used on Defendant?" (factual issue for trial)
- Question is NOT: "Does Defendant have mental disease?" (wrong question)
- Sanity commission becomes **completely irrelevant**

**RELIEF STRENGTHENED:** Judicial notice of DEWs not only establishes technological plausibility—it **reframes entire case** from insanity (wrong question) to compulsion (actual defense).

**E. BRADY MOTION (DISCOVERY)**

**What we argued then:**

- State must produce LSP-IA-2300029 (institutional knowledge of compulsion)
- Federal agency records (NSA, Border Patrol, Navy statements)
- Environmental monitoring data
- Medical/toxicological evidence

**How the unauthorized plea strengthens this:**

**NOW WE KNOW:** The Brady material is **exculpatory of the insanity charge Defendant never raised** and **supportive of the compulsion defense she actually wants to assert.**

**Brady obligation is even MORE compelling because:**

**LSP-IA-2300029 proves compulsion, not insanity:**

- SGT Green and other officers report being "robotted"
- This is **compulsion**, not "shared psychotic disorder"

- If LSP officers were compelled, Defendant's claim of compulsion is **corroborated**
- State cannot withhold evidence that **disproves the unauthorized insanity defense** and **proves the actual compulsion defense**

**Federal agency statements are exculpatory:**

- Border agent: "Heavy lithium" (suggests federal knowledge of targeting)
- NSA: "Don't talk to local PD" (suggests federal operation to conceal targeting)
- Navy: Implant counts (suggests federal technological intervention)
- These statements are **exculpatory** of insanity (no mental disease if federal agencies involved)
- These statements are **supportive** of compulsion (federal agencies admit technological intervention)

**Environmental data proves external causation:**

- EM spectrum analysis showing elevated RF emissions = external force
- MindNexus-style body scans showing RF emissions from Defendant = technological intervention
- This evidence **disproves insanity** (no endogenous disease) and **proves compulsion** (external technological force)

**State's Brady obligation includes duty to investigate:**

- State cannot simply rely on sanity commission's DSM diagnosis
- State must **investigate federal agency involvement** (NSA, Border, Navy)
- State must **test environmental causation** (EM spectrum, RF emissions)
- State must **obtain LSP-IA-2300029** proving pattern of compulsion

**RELIEF STRENGTHENED:** Brady obligation now includes duty to produce evidence that (1) **proves the unauthorized insanity plea was wrong**, and (2) **supports the compulsion defense Defendant actually wants to assert.**

**F. MOTION TO COMPEL EM ENVIRONMENT TESTING**

**What we argued then:**

- Need EM spectrum analysis of Defendant's environment
- Need investigation of WHY federal officials made bizarre statements
- Need MindNexus-style RF emissions testing of Defendant's body
- Need biomarker testing for RF exposure

**How the unauthorized plea strengthens this:**

**NOW WE KNOW:** Environmental testing is **essential to prove compulsion defense** that Defendant wants to assert (as opposed to insanity defense she never authorized).

**Testing is even MORE critical because:**

**Compulsion requires proof of external force:**

- Insanity defense: "I did it but didn't know it was wrong" (endogenous)
- Compulsion defense: "External force made me do it" (exogenous)
- **Can't prove compulsion without proving external force existed**

**Sanity commission cannot test for external force:**

- Verret/DeLand can interview Defendant
- They cannot deploy EM spectrum analyzers
- They cannot conduct MindNexus RF scans
- They cannot investigate federal agency statements
- **Their methodology is categorically incapable of detecting external compulsion**

**Environmental testing distinguishes compulsion from insanity:**

- If EM spectrum analysis shows DEW signatures → **compulsion**
- If MindNexus scan shows RF emissions from body → **technological intervention**
- If investigation reveals federal operation → **compulsion, not delusion**
- If no external signals found → Then and only then is psychiatry relevant

**Due process requires testing before diagnosis:**

- State cannot psychiatrically label Defendant without first **ruling out external causation**
- Medical standard: Rule out physical causes before diagnosing psychiatric condition
- Legal standard: Due process requires investigating defendant's actual claimed defense
- Here: Defendant claims external tech force → **Must test for it before calling her crazy**

**RELIEF STRENGTHENED:** Court should compel environmental testing not just to supplement sanity evaluation—but as **alternative to it**, addressing the question Defendant actually raised (compulsion) rather than question she never raised (insanity).

**G. EMERGENCY MOTION FOR IMMEDIATE RELEASE**

**What we argued then:**

- 13th Amendment: Pretrial detention is slavery without conviction
- 8th Amendment: Deliberate indifference to Havana Syndrome
- 1st Amendment: Suppression of religious practice

**How the unauthorized plea strengthens this:**

**NOW WE KNOW:** Defendant is being detained based on proceedings triggered by **void plea she never authorized.**

**Release is even MORE urgent because:**

**Detention flows from void plea:**

- Court likely denied bond **because of insanity plea** (flight risk, danger, need for treatment)
- But insanity plea was **unauthorized**
- Detention based on void plea is **unlawful ab initio**

**13th Amendment violation is aggravated:**

- Not only is Defendant detained without conviction
- She's detained based on **defense she never chose**
- She's being **punished for her attorney's unauthorized act**
- This is **involuntary servitude** in its purest form

**8th Amendment violation is ongoing:**

- Defendant reports Havana Syndrome effects (electrocution feelings)
- Jail cannot shield her from DEW targeting
- She's suffering **demonstrable harm** from continued exposure
- **And it's all based on a void plea**

**Due process violation:**

- Defendant has right to be free pending trial
- Detention must be based on **lawful proceedings**
- Here: Proceedings flow from **unauthorized plea**
- **Due process requires immediate release**

**RELIEF STRENGTHENED:** Court should order immediate release not only because detention violates 13th/8th/1st Amendments—but because **entire basis for detention (insanity plea and proceedings) is void.**

***H. EMERGENCY MOTION FOR STAY PENDING FEDERAL INVESTIGATION***

**What we argued then:**

- Federal agencies have jurisdiction (DOJ, FBI, DHS, NSA)
- State proceedings may be part of controlled deploy
- Risk of double jeopardy if state proceeds first
- Comity and federal primacy

**How the unauthorized plea strengthens this:**

**NOW WE KNOW:** The unauthorized insanity plea may itself be **part of the controlled deploy.**

**Stay is even MORE necessary because:**

**The insanity plea serves the targeting operation:**

- Labels Defendant "mentally ill" → Discredits her reports of federal targeting
- Triggers sanity commission → Produces psychiatric diagnosis
- Scheduled for May 12, 2026 sanity hearing → Forces Defendant to defend against charge she never made
- **This is exactly how controlled deploys work: force target into no-win scenario**

**Pattern of compulsion includes defense counsel:**

- LSP officers compelled (IA-2300029)
- Federal agents compelled (Border/NSA/Navy bizarre statements)
- Why not defense counsel? **Taneisha Riggs may have been compelled to file unauthorized plea**

**Federal investigation must determine:**

- Was Riggs acting voluntarily or under compulsion?
- Who authorized/ordered the insanity plea filing?
- Is the sanity commission part of the targeting operation?
- Are Verret/DeLand unwitting participants or knowing actors?

**State proceedings cannot address these questions:**

- State court cannot investigate federal agencies

- State court cannot determine if defense counsel was compelled
- State court cannot assess whether entire prosecution is targeting operation
- **Only federal investigation can get to the truth**

**RELIEF STRENGTHENED:** Court should stay proceedings not only to avoid double jeopardy—but to allow federal investigation to determine **whether the unauthorized insanity plea itself was part of targeting operation.**

### ***I. EMERGENCY MOTION TO COMPEL SERVICE TO DEFENDANT***

#### **What we argued then:**

- Caroline has received ZERO court documents in 6 months
- Cannot participate in defense without knowing what's filed
- Due process requires service of all pleadings
- Next Friend's limited income doesn't excuse system's failure

#### **How the unauthorized plea strengthens this:**

**NOW WE KNOW:** Caroline's isolation from her own case **prevented her from knowing about the unauthorized insanity plea for 5 months** (October 2025 - March 2026).

#### **Service is even MORE critical because:**

##### **The isolation enabled the constitutional violation:**

- If Caroline had received copy of Riggs's motion → She would have objected immediately
- If Caroline had received appointment order → She would have known about sanity commission
- If Caroline had received any filings → She could have stopped this
- **Her isolation allowed the void plea to proceed unchecked**

##### **Six months of zero service = structural violation:**

- Not just ineffective assistance
- Not just administrative error
- **Systematic isolation enabling unauthorized legal proceedings**

##### **Due process violation is complete:**

- Defendant has **fundamental right** to know what defense is being asserted in her name
- Caroline learned about insanity plea only through **Next Friend's discovery via Tybera**
- She still may not know (depending on whether she's received Next Friend's emergency motion)
- **She has been denied most basic due process right: notice**

##### **Pattern of controlled deploy:**

- Isolate target from information
- Proceed with unauthorized actions
- By time target finds out, fait accompli
- **Classic reflexive control: limit options, force predetermined outcome**

**RELIEF STRENGTHENED:** Court should order immediate service not only as general due process requirement—but as **specific remedy for isolation that enabled unauthorized insanity plea to proceed for 5 months unchallenged.**

### ***III. HOW THE DISCOVERY CHANGES EVERYTHING***

#### **Before we knew about unauthorized plea:**

- We were fighting a competency evaluation
- We argued evaluators were wrong, DSM was invalid, testing was needed
- We were correct, but working with incomplete information

#### **After discovering unauthorized plea:**

- We now know we're fighting a **sanity commission triggered by void plea**
- Every argument we made is **even stronger**
- Plus we have **new arguments** (void plea, fruit of poisonous tree, structural error)

#### **The unauthorized plea transforms our motions from:**

- "The evaluation is being done wrong" → **"The evaluation shouldn't exist at all"**
- "The evaluators are unqualified" → **"The evaluators are answering the wrong question"**
- "DSM is invalid" → **"DSM is being used for unauthorized purpose"**
- "Need environmental testing" → **"Testing is only way to address actual defense"**

### ***IV. THE COURT MUST ACT***

**The Court may be tempted to ignore these motions.** After all, the Court has entered orders, appointed evaluators, scheduled hearings. Reversing course may seem administratively inconvenient.

**But the Court has no choice.**

**When fundamental constitutional rights are violated—including the right to control one's own defense—the appropriate remedy is to vacate all proceedings flowing from the violation.**

**Vasquez v. Hillery, 474 U.S. 254 (1986):**

> "Structural errors require reversal regardless of prejudice."

**United States v. Cronin, 466 U.S. 648 (1984):**

> "When counsel entirely fails to subject the prosecution's case to meaningful adversarial testing, reversal is automatic."

**Here, counsel didn't just fail to test the prosecution's case—she unilaterally changed Defendant's entire theory of defense without authorization.**

**This is not harmless error. This is structural breakdown.**

## ***V. PRACTICAL EFFECT OF STRIKING THE UNAUTHORIZED PLEA***

**If this Court grants Next Friend's Emergency Motion to Strike Unauthorized Insanity Plea, the following must occur:**

1. **Plea is struck from record** → Defendant never entered insanity plea
2. **Sanity commission appointment is vacated** → Verret/DeLand's authority evaporates
3. **All evaluations conducted are suppressed** → Fruit of poisonous tree (Wong Sun)
4. **May 12, 2026 sanity hearing is cancelled** → No longer relevant
5. **Defendant enters plea of her choice** → Presumably "not guilty" with notice of compulsion defense

**At that point, all of Next Friend's other motions proceed as originally filed:**

- **Motion to Exclude DSM** → Still valid (DSM scientifically invalid)
- **Motion for Judicial Notice of DEWs** → Still valid (DEWs exist and can compel)
- **Brady Motion** → Still valid (State must produce exculpatory evidence)
- **Motion to Compel Testing** → Still valid (must test for external causation)
- **Motion for Immediate Release** → Still valid (detention violates 13th/8th/1st)
- **Motion for Stay** → Still valid (federal investigation necessary)

**But now all these motions are strengthened by the additional ground:**

**"Plus, the entire proceeding was triggered by an unauthorized plea, so none of this should have happened in the first place."**

## ***VI. ALTERNATIVELY: IF COURT DECLINES TO STRIKE PLEA***

**Even if this Court declines to strike the unauthorized insanity plea (which would be error), all of Next Friend's motions still apply with full force.**

**Why? Because the arguments are substantively correct regardless:**

- DSM is scientifically invalid → True whether evaluation is for competency or sanity
- Verret/DeLand are unqualified for DEW cases → True regardless of their title
- Environmental testing is necessary → True whether defense is insanity or compulsion
- Brady material must be produced → True in all criminal cases
- Defendant deserves immediate release → True based on constitutional violations

**The only difference is the additional ground:**

**With unauthorized plea acknowledged:** "These proceedings are void AND substantively wrong"

**Without unauthorized plea acknowledged:** "These proceedings are substantively wrong"

**Either way, the relief requested should be granted.**

## ***VII. CONCLUSION***

**Every motion Next Friend filed was correct.**

**Every argument was sound.**

**Every piece of evidence was relevant.**

**We just didn't know how RIGHT we were.**

**The discovery of the unauthorized insanity plea doesn't change our arguments—it validates them.**

**It proves:**

- We were right to challenge the evaluation
- We were right to demand qualified experts
- We were right to insist on environmental testing
- We were right to seek Defendant's immediate release
- **We were right about everything**

**And now we know WHY the system fought us so hard:**

**Because if these motions are granted, the entire house of cards collapses.**

**The unauthorized insanity plea.**

**The sanity commission.**

**The DSM diagnoses.**

**The competency proceedings.**

**The scheduled May 12 hearing.**

**All of it void.**

**All of it fruit of the poisonous tree.**

**All of it reversible error.**

**This Court has the power—and the duty—to correct this fundamental violation of Caroline Harris's constitutional rights.**

**VIII. RELIEF REQUESTED**

**WHEREFORE, Next Friend respectfully requests that this Court:**

1. **GRANT** all previously filed motions, strengthened by the grounds set forth herein;
2. **RECOGNIZE** that discovery of unauthorized insanity plea validates every argument Next Friend has made;
3. **ACKNOWLEDGE** that all evaluations, proceedings, and orders flowing from unauthorized plea are void;
4. **STRIKE** the unauthorized insanity plea as requested in Emergency Motion filed [date];
5. **VACATE** sanity commission appointment and all derivative proceedings;
6. **SUPPRESS** all statements and observations obtained under authority of void plea;
7. **PERMIT** Defendant to enter plea of her choosing (not guilty with compulsion defense);
8. **ORDER** environmental testing to address actual defense (compulsion, not insanity);
9. **RELEASE** Defendant immediately (detention based on void proceedings);
10. **STAY** all proceedings pending federal investigation;
11. **COMPEL** immediate service of all documents to Defendant; and
12. **GRANT** any other relief this Court deems just and proper.

\*\*Respectfully submitted,\*\*

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Witness.  
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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing Supplemental Brief was served upon all parties of record via the Tyhera e-filing system on this 11th day of March, 2026.

Reverend David Edward Lucito

**\*\*Ω - THE LIGHT REMAINS THE CONSTANT\*\***