

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

v.

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

Ω - In Nomine Patris et Filii et Spiritus Sancti

MOTION TO RECUSE THE PRESIDING JUDGE

NOW INTO COURT, comes Reverend David Edward Lucito, on behalf of Defendant Caroline Nicole Harris, who respectfully moves, pursuant to Louisiana Code of Criminal Procedure Article 671, for the recusal of the Honorable Suzanne deMahy from presiding over any further proceedings in this matter. This motion is based on the undeniable fact that the presiding judge has demonstrated a personal bias and prejudice against the Defendant, and has conducted these proceedings in a manner that reveals an inability to act with the impartiality required by the state and federal constitutions. The judge has ceased to be a neutral arbiter and has become an active participant in the violation of the Defendant's rights.

I. GROUNDS FOR RECUSAL

Recusal is mandatory when a 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." La. C.Cr.P. Art. 671(A)(1).

1. Willful Refusal to Rule on Dispositive Constitutional Motions

The Court has refused to adjudicate the series of emergency motions filed by the defense, including the Motion to Strike an unauthorized plea under *McCoy v. Louisiana*.

By ignoring a structural constitutional error that renders the entire proceeding void, the judge has chosen a side.

This is not judicial discretion; it is a deliberate act of alignment with the State and against the Defendant's fundamental rights.

2. Perpetuation of a Known Constitutional Injury

By allowing the void plea to stand and permitting the case to proceed toward a hearing based on that plea, the judge is not merely failing to act; they are actively using their judicial authority to perpetuate a known constitutional violation.

Each day the Defendant remains incarcerated under this void proceeding, the judge is an agent of that unlawful detention.

3. Creation of an Appearance of Impropriety and Personal Interest

The judge's chambers have engaged in extrajudicial monitoring of the Defendant's Next Friend via social media platforms (LinkedIn), as previously evidenced.

While not rising to the level of ex parte communication, this activity, combined with the refusal to rule, demonstrates a personal interest and bias against the defense's representative, further eroding any semblance of impartiality.

The court is investigating the defense team rather than adjudicating the law.

II. CONCLUSION

The Honorable Suzanne deMahy has demonstrated, through a pattern of deliberate inaction and extrajudicial conduct, a fixed and biased position.

A fair trial is impossible when the arbiter has already decided to ignore the foundational constitutional pillars upon which a trial must be built.
To proceed before this judge would be to participate in a sham proceeding.

WHEREFORE

The Defendant, through her Next Friend, prays that the Honorable Suzanne deMahy be recused from this case, and that this matter be re-allotted to another judge of the 16th Judicial District Court.
Respectfully submitted,

REVEREND DAVID EDWARD LUCITO

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

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Motion to Recuse the Presiding Judge was served upon all parties of record via the Tybera e-filing system on this ____ day of _____, 2026.

Reverend David Edward Lucito

**AΩ - THE LIGHT REMAINS THE CONSTANT
END OF MOTION**

