

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

ELECTRONICALLY FILED
2026 Feb 05 10:30 AM
2025-215897
St. Mary Parish - Criminal
Greg Aucoin, Clerk of Court

A IN THE NAME OF GOD, THE ALPHA AND OMEGA Ω

STATE OF LOUISIANA

V.

CAROLINE NICOLE HARRIS

Case No.: 2025-215897

VERIFIED AFFIDAVIT AND MEMORANDUM OF LAW
SUBMITTED AS NEXT FRIEND OF DEFENDANT CAROLINE NICOLE HARRIS
PURSUANT TO *WHITMORE v. ARKANSAS*, 495 U.S. 149 (1990)
[Filed Under Protest — Movant Does Not Waive Any Objections]

The undersigned respectfully submits this Verified Affidavit and Memorandum of Law for the consideration of this Honorable Court. Next Friend does not purport to act as counsel for Defendant. Next Friend submits this instrument pursuant to Whitmore v. Arkansas, 495 U.S. 149 (1990), *having established that Defendant is unable to litigate her own cause due to inaccessibility to the court system and a communications blackout preventing meaningful access to her own defense counsel. To the extent this Court finds Next Friend lacks standing under *Whitmore*, Next Friend alternatively submits this instrument as an amicus memorandum tendered for the Court's consideration. Should this Court decline to accept this filing in either capacity, Next Friend

respectfully requests that the Court state its reasons on the record, as a denial without explanation would itself constitute an access-to-courts violation.*

ELECTRONICALLY FILED
2026 Feb 05 10:30 AM
2025-215897
St. Mary Parish - Criminal
Greg Aucoin, Clerk of Court

TABLE OF AUTHORITIES

CASES

Ake v. Oklahoma, 470 U.S. 68, 83 (1985)

Bell v. Wolfish, 441 U.S. 520, 535 (1979)

Chicago Tribune Co. v. Mauffray, 991 So. 2d 3 (La. App. 1 Cir. 2008)

Estelle v. Gamble, 429 U.S. 97, 104 (1976)

Mullane v. Central Hanover Bank & Trust Co., 339 U.S. 306, 314 (1950)

State v. Hebert, 480 So. 2d 429, 431 (La. 1985)

Whitmore v. Arkansas, 495 U.S. 149 (1990)

STATUTES

U.S. CONST. amend. VIII

U.S. CONST. amend. XIII, § 1

Classified Information Procedures Act (CIPA), 18 U.S.C. App. 3

18 U.S.C. § 2332a (Federal jurisdiction over weapons of mass destruction)

Louisiana Code of Criminal Procedure Article 642 (Competency to stand trial)

Louisiana Code of Criminal Procedure Article 644 (Sanity commission)

****DISCLAIMER REGARDING "MOTION" LANGUAGE****: Next Friend is not an attorney and does not purport to litigate this case or file formal motions on Defendant's behalf. The "Motion" language and "Prayer for Relief" contained herein are ****suggestions offered for the Court's consideration****, which the Court may adopt, reject, modify, or decline in its discretion. Next Friend submits this document solely to:

1. Place sworn testimony and evidence into the record;
2. Preserve constitutional objections for appellate or federal review;
3. Offer legal analysis that defense counsel may adopt if useful to her client's defense;
4. Alert this Court to jurisdictional and constitutional issues that may require judicial notice.

This instrument does not interfere with defense counsel's representation and does not constitute unauthorized practice of law. The Court retains sole authority to determine what, if any, action is appropriate.

****NOW INTO COURT**** comes Reverend David Edward Lucito, as Next Friend of Defendant Caroline Nicole Harris, pursuant to **Whitmore v. Arkansas**, 495 U.S. 149 (1990), who respectfully submits this Verified Affidavit and Memorandum of Law for the consideration of this Honorable Court, and in support thereof states:

WHITMORE VERIFICATION

I, Reverend David Edward Lucito, do hereby verify under oath, subject to the penalties of perjury under the laws of the State of Louisiana, that:

****STANDING ASSERTED IN THREE CAPACITIES:****

****A. AS WITNESS WITH FIRSTHAND KNOWLEDGE:****

I am a fact witness with direct, firsthand knowledge material to this case. I was present at the September 19, 2023 church incident when Ms. Harris reported a neurostrike assault. I am the only documented victim of the same neuroweapon technology, as verified by Louisiana State Police Internal Affairs Case IA-2300029 (sustained misconduct finding against Senior Trooper Carl Holiday for conducting psychological operation using fraudulent neuro-device). I have firsthand knowledge of the weapons' effects, the institutional responses, and the pattern of misdiagnosis by standard psychiatric evaluators. My testimony is relevant to the voluntariness of Ms. Harris's alleged conduct and the competency evaluation issues.

ELECTRONICALLY FILED
2025 Feb 03 10:30 AM
2025-215897
St. Mary Parish - Criminal
Greg Aucoin, Clerk of Court

****Under Louisiana Code of Criminal Procedure Article 646**, "the defendant shall be entitled to have physicians or other witnesses present at the examination, and to testify on the question of his mental capacity at the contradictory hearing." As a witness with firsthand knowledge of the neuroweapon effects at issue in this competency evaluation, I have statutory standing to participate in these proceedings and to proffer evidence material to the court's determination.**

****B. AS NEXT FRIEND UNDER** ***WHITMORE v. ARKANSAS*****, 495 U.S. 149 (1990):****

****1. Defendant Caroline Nicole Harris is unable to litigate her own cause.** Ms. Harris is currently detained at St. Gabriel Women's Prison. Affiant does not assert that Ms. Harris is mentally incompetent. To the contrary: Ms. Harris's consistent and detailed reporting of neuroweapon effects — effects corroborated by Affiant's own documented experience, by LSP Internal Affairs Case IA-2300029, and by PACTS International validation — reflects lucidity, not delusion. The disability preventing Ms. Harris from litigating her own cause is not a defect in her mental state. It is a ****communications blackout**** that has sealed her off from the legal system, combined with an ****imminent competency evaluation by evaluators lacking the specialized expertise**** necessary to recognize what Ms. Harris is accurately reporting.**

Neuroweapon interference has directly discouraged and disallowed Ms. Harris from reaching out to Affiant — a trusted confidante — for acute emergency help. This is not speculation; it is consistent with the documented pattern of directed energy weapon effects on targeted individuals' communications and decision-making, as corroborated by Affiant's own experience under LSP Internal Affairs Case IA-2300029. When Ms. Harris was previously incarcerated at East Baton Rouge Parish Prison, she was unable to reach Affiant's cell phone number through the jail phone system; however, a 1:00 A.M. prank call was executed from the warden's office to Affiant without any interference whatsoever—demonstrating that the communications barrier is selective, not systemic. Affiant has not heard from Ms. Harris since her arrest in August 2025. Her defense

counsel has failed to respond to any communications from Next Friend. The District Attorney has not acknowledged evidence filed with this Court.

ELECTRONICALLY FILED
2026 Feb 05 10:30 AM
2025-215897
St. Mary Parish - Criminal
Greg Aucoin, Clerk of Court

Ms. Harris is not incapable of directing her defense. She is ****incapable of reaching anyone who can help her direct it.**** A standard forensic psychiatrist, lacking training in directed energy weapon effects, will evaluate Ms. Harris's accurate account of neuroweapon targeting and code it as psychosis. Once that determination is made, Ms. Harris's ability to challenge it — already hobbled by the blackout — will be extinguished entirely. The competency evaluation order, as currently structured, is the mechanism by which a lucid defendant will be declared incompetent. Next Friend files this instrument to prevent that from happening before it can be challenged.

****2.** I am truly dedicated to Ms. Harris's best interests. ****** I have a documented, ongoing relationship with Ms. Harris predating this prosecution. As early as October 2021, I filed emergency military outreach on behalf of "Jane Doe" (Ms. Harris) with USNORTHCOM, MEDCOM, Army CID, FBI, and state fusion centers, reporting her targeting by gangstalking, cybertorture, and directed energy weapons while she was living in Conroe, Texas (*see Exhibit O: Columbia Down SOS Emergency Insider Threat Email compilation*). I was present at the church incident on September 19, 2023, when Ms. Harris reported a neurostrike assault. I have filed sworn affidavits, evidence packets, and supporting documentation with this Court on her behalf. I am a victim of the same neuroweapon technology allegedly affecting Ms. Harris, as verified by Louisiana State Police Internal Affairs Case IA-2300029 and PACTS International. My interest in this case is not abstract—it is personal, documented, and directly tied to her defense.

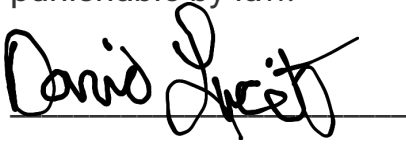
****3.** I have a significant relationship with Defendant. ****** I have communicated directly with Ms. Harris regarding her reports of electronic harassment. I have documented her symptoms and corroborated her accounts through my own experience as a target of the same technology. I have dedicated substantial time and resources to preserving evidence and filing with this Court on her behalf.

****4.** I am not acting as her attorney. ****** I do not purport to represent Ms. Harris in any legal capacity. I submit this affidavit and memorandum as Next Friend—a witness with standing to place evidence, testimony, and legal argument before this Court for its consideration. I ask only that this Court accept, reject, or strike this filing ****on the record****, so that its disposition is documented for review.

****Verification:****

I hereby verify that the facts stated in this Affidavit are true and correct to the best of my knowledge, information, and belief. I understand that false statements made under oath are punishable by law.

ELECTRONICALLY FILED
2026 Feb 05 10:30 AM
2025-215897
St. Mary Parish - Criminal
Greg Aucoin, Clerk of Court



Reverend David Edward Lucito
104 Tillou Andrus Drive
Opelousas, Louisiana 70570
(337) 326-9914

Date: 2/5/2026

MOVANT'S STANDING

Next Friend is not a random third party but rather an **expert witness, material witness, and character witness** in this case with direct personal knowledge of the allegations underlying the charged offense. Specifically:

1. **Expert Witness**: Affiant is a documented victim of the same neuroweapon technology allegedly affecting Ms. Harris, as evidenced by:
 - Louisiana State Police Internal Affairs Case IA-2300029 (sustained findings of official misconduct against a state trooper who conducted a psychological operation against Affiant regarding neuroweapons);
 - PACTS International validation of Affiant's status as a neuroweapon target;
 - Multiple law enforcement reports documenting electronic harassment (BRPD Report 23-0500193);
 - Sworn testimony regarding the operational characteristics and effects of directed energy weapons;
2. **Material Witness**: Affiant has firsthand knowledge of:
 - Ms. Harris's reports of electronic harassment prior to the charged offense;
 - The pattern of law enforcement dismissal of neuroweapon complaints;
 - The institutional response (including psychiatric commitments) used to silence victims;

- Communications with military and law enforcement personnel regarding the weapons system;

ELECTRONICALLY FILED

2026 Feb 05 10:30 AM

2025-215897

St. Mary Parish - Criminal

Greg Aucoin, Clerk of Court

3. **Character Witness**: Affiant can testify to Ms. Harris's mental state, behavioral patterns, and reports of technological harassment, all directly relevant to the voluntariness of any alleged criminal act;

4. **Direct Stake in Proceedings**: As a victim of related electronic harassment detailed in filings on January 15, 2026 (Tybera e-filing IDs 38863/35223), Next Friend has a direct interest in ensuring that courts do not process neuroweapon victims as criminals, as such miscarriages of justice perpetuate the cover-up of weapons of mass destruction deployed against civilians;

This motion is filed pursuant to:

- The Court's inherent supervisory authority to prevent manifest injustice;
- The public interest in ensuring constitutional due process;
- Louisiana Code of Criminal Procedure Article 646 (allowing defendant's witnesses to participate in competency proceedings);
- The exceptional circumstances doctrine recognized in *Chicago Tribune Co. v. Mauffray* and related cases where third parties may raise constitutional issues affecting judicial integrity;

Next Friend is not seeking to supplant defense counsel, but rather to provide testimony, evidence, and argument that defense counsel may be unable or unwilling to present due to the communications blackout documented herein, wherein defense counsel has failed to respond to Next Friend's attempts at contact, the District Attorney has not acknowledged evidence filed with this Court, and Ms. Harris has not contacted Next Friend since her arrest in August 2025, consistent with a documented pattern of neuroweapon interference discouraging her outreach. Should defense counsel wish to adopt these arguments, Next Friend respectfully requests this Court set the matter for contradictory hearing.

Next Friend further notes that the Tybera e-filing system's \$7.00 per-batch filing fee materially burdens timely preservation of objections where the Court has not served or clarified its own orders, creating a financial barrier to access to court in matters affecting liberty. While Next Friend has preserved objections through filings dated January 15, 2026, repeated fees cannot be required to cure the Court's failure to provide adequate notice or opportunity to respond.

I. PRELIMINARY STATEMENT [AQ]

This is not a motion about tire slashing. This is a motion about whether any court in the United States—can conduct a fair trial when the foundational assumption of voluntary human action has been technologically demolished.

ELECTRONICALLY FILED
2026 Feb 05 10:30 AM
2025-215897
St. Mary Parish Criminal
Greg Aucoin, Clerk of Court

****The evidence before this Court demonstrates verified institutional bad faith.**** Louisiana State Police Internal Affairs Case IA-2300029 documents sustained findings of official misconduct against Senior Trooper Carl Holiday, who conducted a deliberate psychological operation against Affiant by delivering a fraudulent "neuro-wave collection device" with false instructions claiming to be from the "Governor's assistant." This was not negligence—this was institutional mockery of a citizen reporting weapons-based harassment. The trooper's ruse became proof of the very conspiracy he attempted to discredit.

The evidence further demonstrates:

1. A sustained finding of official misconduct by Louisiana State Police Internal Affairs against Senior Trooper Carl Holiday for conducting a deceptive psychological operation against Affiant regarding "neuro-weapons" (IA-2300029);
2. An unsworn account from a U.S. military source (Misamore) regarding behavior-modification weapons systems on a military installation, documented at tinyurl.com/gangstalkusa; the 2020 Report of the UN Special Rapporteur on Torture (A/HRC/43/49), which formally defines "cybertorture" and identifies neurotechnology as an emerging vector of psychological torture; and UN-published expert submissions regarding Havana Syndrome and directed energy weapon effects;
3. A complete communications blackout preventing any legitimate legal process in this case—the defense attorney will not respond to filings, the District Attorney has not contacted Next Friend regarding evidence submitted, and Affiant has not heard from Ms. Harris since her arrest in August 2025, consistent with documented neuroweapon interference discouraging her outreach;
4. A pattern of institutional non-engagement that transforms every dismissal into evidence of systemic bad faith.

****The Court faces a binary choice:****

Either these allegations are false—in which case the State must prove it through adversarial process, not silence—or they are true, in which case no element of voluntary criminal conduct

(*actus reus*) can be proven beyond reasonable doubt in any case anywhere, and the entire criminal justice system is operating under a foundational fraud.

ELECTRONICALLY FILED
2026 Feb 05 10:30 AM
2025-215897
St. Mary Parish - Criminal
Greg Aucoin, Clerk of Court

****This Court cannot split the difference.**** Failure to rule on standing, admissibility, and merits leaves these constitutional objections unresolved and necessitates appellate review.

II. JURISDICTIONAL STATEMENT ****[AQ]****

This Court has original jurisdiction over criminal matters in St. Mary Parish. However, the evidence presented raises questions that exceed the competency of any state court:

- Whether weapons of mass destruction are being deployed domestically;
- Whether classified military technology has compromised the integrity of criminal proceedings;
- Whether behavior-modification systems constitute "invisible" duress vitiating criminal liability;
- ****Whether the evidence necessary for defense requires access to classified federal information that this Court cannot lawfully access or disclose.****

****If the neuroweapon technology is classified, the case becomes legally untriable at the state level.**** The Classified Information Procedures Act (CIPA), 18 U.S.C. App. 3, establishes procedures for handling classified information in federal criminal cases—procedures this Court does not possess. If Ms. Harris's defense requires:

- Technical specifications of directed energy weapons;
- Operational parameters of behavior-modification systems;
- Federal agency deployment records;
- Military communications regarding domestic weapons use;

...then this Court ****cannot provide a fair trial**** because it cannot access, evaluate, or allow the defense to present the classified evidence necessary to prove involuntariness. A state court proceeding under such circumstances violates due process.

If the allegations are substantiated, this Court ****lacks subject matter jurisdiction**** to proceed, as the case implicates:

- The Classified Information Procedures Act (CIPA), 18 U.S.C. App. 3;

- Federal jurisdiction over weapons of mass destruction, 18 U.S.C. § 2332a;
- Constitutional due process questions requiring federal resolution.

ELECTRONICALLY FILED
2026 Feb 05 10:30 AM
2025-215897
St. Mary Parish - Criminal
Greg Aucoin, Clerk of Court

III. FACTUAL BACKGROUND **[AQ]**

A. The Fundamental Reality: All Institutional Behavior Is Subject to the Weapons

****Before addressing the specific facts of this case, this Court must understand the foundational reality documented herein:****

****The same neuroweapon systems that targeted Ms. Harris into this courtroom are capable of influencing every institutional actor in this proceeding**** — including law enforcement, prosecutors, defense counsel, evaluators, and this Court itself.

Dr. Robert Duncan documented in "The Matrix Deciphered" (Exhibit E) that justice systems would be comprehensively compromised by these weapons systems. Affiant characterizes this as courts being "compromised twenty-one ways to Sunday" — a summary of Duncan's analysis of the weapons' capability to influence every institutional actor and decision point in judicial proceedings. The institutional behavior documented in this case — police psyops (IA-2300029), prosecutorial silence, defense counsel blackout, and the appointment of unqualified evaluators — is not mere negligence or bureaucratic failure. ****It is evidence of the weapons' operational control over institutional decision-making.****

****Every action this Court takes in response to this filing is subject to the same influence:****

- ****If this Court strikes this filing**** → the weapons permitted/compelled the strike
- ****If this Court ignores this filing**** → the weapons permitted/compelled the silence
- ****If this Court denies standing**** → the weapons permitted/compelled the denial
- ****If this Court engages the merits**** → the weapons permitted/allowed the engagement

****This is not speculation. This is the documented operational reality**** established by:

1. LSP IA-2300029 — State police compelled to conduct psyop against neuroweapon reporter
2. SGT Jeffrey Green — Military personnel admitting being "robotted" to harass Affiant

3. Baton Rouge General misdiagnosis — Psychiatrist compelled to code verified targeting as

"delusion"

4. Communications blackout — Defense counsel compelled to ignore material witness

5. Exhibit O military outreach — Federal/military authorities compelled to ignore emergency reports dating to 2021

ELECTRONICALLY FILED

2026 Feb 05 10:30 AM

2025-215897

St. Mary Parish - Criminal

Greg Aucoin, Clerk of Court

****The weapons operate by controlling human decision-making through behavior modification, induced thoughts, emotional manipulation, and direct neural interference.**** Individuals subject to this influence often believe their decisions are their own, even as they execute actions contrary to their training, ethics, and institutional obligations.

****Therefore, this Court is advised:****

Any institutional response to this filing — whether favorable or adverse to Defendant — must be understood as occurring within an environment where voluntary institutional action cannot be presumed. ****The Court's own response to this filing will itself be evidence**** of either:

(a) the weapons' continued operational control over justice system actors, OR

(b) this Court's successful resistance to such control through recognition of the threat.

****With this understanding established, Next Friend now presents the specific factual background:****

B. The Defendant's Arrest

On August 26, 2025, Caroline Nicole Harris was arrested for criminal damage to property (tire slashing). The arrest was publicized by the Morgan City Police Department on social media, where Next Friend publicly identified Ms. Harris as a documented victim of electronic harassment and neuroweapon targeting.

B. The Verified Institutional Bad Faith

As set forth above, Louisiana State Police Internal Affairs Case IA-2300029 (attached as Exhibit B) documents sustained findings of institutional bad faith against Senior Trooper Carl Holiday. The trooper's ruse became the proof of the conspiracy it was designed to discredit.

C. The Sworn Evidence of a National Security Emergency

On January 15, 2026, Next Friend filed with this Court via the Tybera e-filing system (Filer Interface ID 38863, Clerk Interface ID 35223) a comprehensive evidence packet including

ELECTRONICALLY FILED
2026 Feb 05 10:30 AM
2025-215897
St. Mary Parish - Criminal
Greg Aucoin, Clerk of Court

- Sworn affidavit documenting a multi-year Homeland Security Emergency
- Louisiana State Police Internal Affairs Report IA-2300029 (sustained misconduct findings)
- PACTS International validation letter
- UN Special Rapporteur Report on Cybertorture (A/HRC/43/49, 2020) and UN-published expert submissions regarding Havana Syndrome
- "The Matrix Deciphered" by Dr. Robert Duncan (establishing theoretical framework)
- Havana Syndrome Louisiana Capitol initial complaint
- BRPD Report 23-0500193 and LSP harassment documentation
- Multiple case filings documenting proliferated WMD in state capitol and weaponized encounters with law enforcement

****Next Friend incorporates by reference all materials filed January 15, 2026, as if fully set forth herein.****

These filings document eight distinct categories of evidence, including:

- Military communications with Alabama National Guard;
- AI-generated propaganda demonstrating real-time influence on human and machine systems;
- Verified breaches of White House and War Department email systems;
- Psychotronic weapons disclosure from Washington State Fusion Center;
- Validation letters from international human rights organizations (PACTS International);

A multi-year pattern of:

- Criminal harassment intercepting emergency communications;
- Forced psychiatric commitments as retaliation;
- Law enforcement refusal to investigate despite documented evidence;
- Systematic institutional gaslighting.

D. The Communications Blackout

Since filing the affidavit and supporting evidence:

- Defense counsel has not responded to any communications;
- The District Attorney has not acknowledged receipt of evidence;

- Ms. Harris has not contacted Affiant since her arrest in August 2025, consistent with the communications blackout pattern described above;

- All attempts at normal legal process have been met with ****total institutional silence****

ELECTRONICALLY FILED
2026 Feb 05 10:30 AM
2025-215897
St. Mary Parish - Criminal
Greg Aucoin, Clerk of Court

****This is not neglect. This is quarantine.****

****Next Friend's Offer of Communications Assistance:**** To the extent this Court is willing to facilitate communications between Ms. Harris and her defense counsel, Next Friend respectfully offers to provide his personal communications services at no cost to the Court or the Defendant. As these weapons systems are known to degrade and interfere with the accused's ability to communicate—as documented herein and in the exhibits filed January 15, 2026—Next Friend, who has direct experience navigating such interference, stands ready to assist in ensuring Ms. Harris can meaningfully participate in her own defense. This offer is made in good faith, solely in the interest of due process, and does not constitute an assertion of legal representation.

IV. LEGAL ARGUMENT **[AQ]******

A. The Prosecution Cannot Prove Voluntary Action Beyond Reasonable Doubt

****The fundamental element of any crime is voluntary action (*actus reus*).****

***State v. Hebert*, 480 So. 2d 429, 431 (La. 1985) (involuntary conduct negates criminal liability).**

If behavior-modification weapons exist as alleged, the State cannot prove beyond reasonable doubt that ****any defendant acted voluntarily****. The technology—if operational—renders the ***mens rea*** and ***actus reus*** requirements metaphysically impossible to satisfy.

The State has three options:

1. ****Disprove the allegations**** through adversarial process;
2. ****Admit they cannot disprove them**** and dismiss the charges;
3. ****Maintain silence**** and thereby admit the system cannot function under scrutiny.

****The State has chosen silence.****

B. Due Process Requires Engagement, Not Evasion

ELECTRONICALLY FILED
2026 Feb 05 10:30 AM
2025-215897
St. Mary Parish Criminal
Greg Aucoin, Clerk of Court

The Due Process Clause requires "notice and a meaningful opportunity to be heard." *Millene v. Central Hanover Bank & Trust Co.**, 339 U.S. 306, 314 (1950).

When a defendant presents evidence of:

- Verified institutional misconduct (LSP IA-2300029);
- Systematic harassment documented in police reports (BRPD 23-0500193);
- International human rights organization validation;
- Communications blackout preventing legal representation;

****The prosecution cannot simply ignore it.****

The State's silence is not a rebuttal—it is an admission that the evidence cannot be addressed within the current framework.

C. The Court Faces an Institutional Crisis of Legitimacy

If the allegations are true, then:

- Every conviction in every jurisdiction is suspect;
- No defendant can be proven to have acted voluntarily;
- The entire criminal justice system is operating under false pretenses;
- Courts are unknowingly processing victims as criminals.

If the allegations are false, then:

- The State must prove it through evidence and testimony;
- Expert witnesses must be called;
- The technology's non-existence must be demonstrated;
- The documented LSP misconduct must be explained.

****What the State cannot do is pretend the question doesn't exist.****

E. The Court's Competency Evaluation Order Must Be Vacated or Modified to Require Qualified Experts

On or about January 20, 2026, this Court ordered a competency evaluation of Ms. Harris. While Next Friend does not oppose evaluation per se, **the Court must ensure any evaluation possesses the specialized expertise necessary to distinguish neuroweapon trauma from mental illness**.

ELECTRONICALLY FILED
2026 Feb 05 10:30 AM
2025-215897
St. Mary Parish Criminal
Greg Aucoin, Clerk of Court

****Next Friend further notes**** that upon inquiry to the Clerk of Court on February 3, 2026, the minute clerk identified the court-appointed forensic evaluators as ****Luke Verret**** and ****Sarah Deland****. Next Friend objects that neither evaluator has been shown to possess specialized expertise in Havana Syndrome, directed energy weapon effects, or neuroweapon-induced trauma necessary to distinguish accurate reporting of technological assault from psychosis. This Court has not served Next Friend with the competency evaluation order, nor identified the appointed evaluators' specific qualifications in this specialized field. Next Friend objects to any evaluation conducted by evaluators lacking demonstrated expertise in Havana Syndrome, directed energy weapon effects, and neuroweapon-induced trauma.

****Critically, in** ***State v. Daniel Callihan*** ** (2025), Judge Lance Africk of the U.S. District Court for the Eastern District of Louisiana refused to accept a competency finding from Dr. Sarah DeLand and ordered an additional evaluation by a different psychiatrist because he was "concerned about the thoroughness of the mental examination."**** This recent precedent establishes that Dr. DeLand's standard assessments have been found insufficient by federal judges when specialized evaluation is required. Where the defendant reports directed energy weapon effects documented in external investigations, standard forensic psychiatry lacks the thoroughness necessary for constitutional evaluation.

****Standard psychiatric evaluators are unqualified for this assessment.****

Louisiana Code of Criminal Procedure Article 644 requires sanity commission members to be "qualified by training and experience" for forensic evaluation. When the defendant's alleged incompetency stems from ****documented neuroweapon effects**** rather than traditional mental illness, "qualified" means expertise in:

- Havana Syndrome and anomalous health incidents
- Directed energy weapon effects on neurological function
- Traumatic brain injury from electromagnetic exposure
- The distinction between technology-induced symptoms and psychosis
- ****The biological signatures of directed energy targeting documented in Dr. Robert Duncan's "The Matrix Deciphered" (Exhibit E)****

****Dr. Duncan documents the objective bioeffects signature of neuroweapon targeting: voice-to-skull (V2K) transmission, forced wakefulness/sleep deprivation, induced emotional distress, pain generation, and disrupted decision-making.**

ELECTRONICALLY FILED
2025 Feb 05 10:30 AM
2025-215897
St. Mary Parish - Criminal
Greg Aucoin, Clerk of Court

****What psychiatry diagnoses as "schizophrenia" IS voice-to-skull technology deployment.** There is no distinction between "mental illness voices" and "targeting voices" — they are the same electromagnetic weapon system. The diagnostic category of schizophrenia emerges in the 1880s precisely when electromagnetic technologies become manipulable (Maxwell 1865, Hertz 1887, Marconi 1895).**

****Ancient "voice-hearing" was metaphorical, not literal skull-transmitted speech.** Plato's daemon appears in only a few references and represents internal conscience or intuition, not the constant murderous narration characteristic of modern "schizophrenia." Joan of Arc's voices were framed as divine spiritual guidance, not the torture/suicide-command pattern. No pre-1880s voice-hearer reported the literal, externally-transmitted, command-hallucination pattern that defines modern "schizophrenia" because ****the weapon did not exist yet****.**

****The post-1880s pattern — literal voices commanding suicide, narrating actions, inducing paranoia — is the bioeffects signature of V2K deployment via heterodyned directed energy.** Standard psychiatrists code this as "auditory hallucinations" without recognizing the technological origin, creating a perfect concealment mechanism for the weapons program.**

****Standard forensic psychiatrists lack this expertise.** As noted in the Len Ber, M.D. article (filed with this Court), contemporary physicians are inadequate for diagnosing neuroweapon injury. They mistake technological assault for mental illness, leading to misdiagnosis, forced medication, and civil commitment of victims.**

****Affiant's own experience demonstrates this danger.** In or around early May 2023, several weeks following the encounter with Senior Trooper Carl Holiday documented in LSP Internal Affairs Case IA-2300029, Affiant was psychiatrically evaluated at Baton Rouge General Medical Center after reporting harassment by Louisiana State Police and U.S. military personnel. Prior to this evaluation, Affiant had explicitly warned SGT Huval that his failure to provide an incident report after taking Affiant's physical evidence would leave Affiant vulnerable to medical malpractice—a warning that proved prophetic. The discharge instructions state that Affiant "immediately displays delusional thought processes" solely because Affiant reported receiving "a suspicious packet from the Louisiana Police Department and US National Guard as they are stalking him."**

****However, Affiant's reports were accurate and subsequently verified:****

ELECTRONICALLY FILED
2026 Feb 05 10:30 AM
2025-215897
Trooper Patrick J. Cooper
St. Mary Parish Criminal
Greg Aucoin, Clerk of Court

1. ****LSP Internal Affairs Case IA-2300029**** — sustained finding that Senior Trooper Patrick J. Cooper conducted a deceptive psychological operation against Affiant using a fraudulent "neuro-wave" collection device";
2. ****DCIS Subpoena**** — Defense Criminal Investigative Service issued a subpoena of Affiant's Gmail account in connection with the March 21, 2024 breach in which Affiant received hundreds of military emails including White House RSVP confirmations and Space Force internal travel logs, confirming federal investigation of compromised military communications systems;
3. ****SGT Jeffrey Green Recorded Calls**** — Army CID at Redstone Arsenal was notified of years of prank calls from military personnel; SGT Green continues to call Affiant and admits on recorded calls that he is being "robotted" to harass Affiant.

****The diagnosis was false.**** Affiant was not delusional — Affiant was accurately reporting documented state and military harassment. The evaluator at Baton Rouge General lacked the expertise to verify the claims before coding them as psychosis.

****Ms. Harris faces the identical danger.**** Without DEW-qualified evaluators, her accurate reports of neuroweapon targeting will be misdiagnosed as delusion, and she will be wrongfully found incompetent based on the evaluators' ignorance rather than her actual mental state.

See Exhibit N: Baton Rouge General Medical Center Discharge Instructions (psychiatric misdiagnosis of verified targeting as "delusional thought processes"); Exhibit B: LSP Internal Affairs Case IA-2300029 (proof of state psyop); Homeland Security Emergency Affidavit filed January 15, 2026 (documentation of email breach, DCIS investigation, and military harassment).

****Two physicians are specifically qualified to evaluate Ms. Harris:****

1. ****Dr. Michael Hoffer**** (University of Miami) - Otolaryngology and neurological surgery professor who examined Havana Syndrome victims in Cuba, published peer-reviewed research on vestibular/balance issues and cognitive patterns from directed energy exposure, and testified before the National Academies. He has diagnosed neuroweapon trauma in multiple patients.
2. ****Dr. Lydia Shajenko**** (New Jersey) - Neurologist and clinical neurophysiologist (MD/PhD) specializing in Havana Syndrome-like conditions from directed energy weapons. She uses a broad,

comprehensive battery of testing to detect neuroweapon trauma and has treated individuals reporting neurological effects consistent with electromagnetic weapon exposure.

ELECTRONICALLY FILED
2026 Feb 05 10:30 AM
2025-215897
St. Mary Parish - Criminal
Greg Aucoin, Clerk of Court

****Due process requires access to qualified experts.****

Ake v. Oklahoma, 470 U.S. 68, 83 (1985) establishes that when a defendant's mental state is seriously in question, due process requires access to a competent psychiatrist. Here, where the question is not mental illness but ****neuroweapon-induced trauma****, due process requires access to experts qualified in that specific field.

****The Court's current order fails this standard**** because:

1. No indication the appointed evaluator has Havana Syndrome/DEW expertise
2. Standard forensic psychiatrists will misdiagnose tech effects as delusion
3. The sustained LSP misconduct (IA-2300029) proves institutional bias against neuroweapon reports
4. Any state-appointed evaluator operates within the same system that engaged in the trooper's ruse

****If the State insists Ms. Harris is incompetent, the State must prove it through qualified evaluation - not through evaluators who lack the expertise to distinguish between psychosis and weaponized assault.****

****Next Friend therefore prays this Court order independent evaluation by Dr. Michael Hoffer and/or Dr. Lydia Shajenko, or equivalent directed energy weapon and Havana Syndrome specialists with peer-reviewed publications in this field, to be completed prior to any state sanity commission proceeding under La. C.Cr.P. Art. 644.****

D. Pretrial Detention Constitutes Unconstitutional Slavery; Post-Conviction Incarceration Questionable

****Every person in custody awaiting trial is legally innocent.****

The Thirteenth Amendment explicitly states: "Neither slavery nor involuntary servitude, ****except as a punishment for crime whereof the party shall have been duly convicted****, shall exist within the United States." U.S. CONST. amend. XIII, § 1 (emphasis added).

****Courts claim pretrial detention is "regulatory, not punitive" under *Bell v. Wolfish*, 441 U.S. 520 (1979). But the State itself admits pretrial detention is punishment through the "Time Served" Credit system.****

ELECTRONICALLY FILED
2025 Feb 05 10:50 AM
2025-215897
St. Mary Parish - Criminal
Greg Aucoin, Clerk of Court

****If pretrial detention were truly "regulatory" and not "punishment," there would be no "time served" credit.** The fact that pretrial detainees receive credit against their eventual sentence ****proves the State treats pretrial detention as punishment****. You cannot receive credit for time served unless the time was served ****as punishment****.**

****The conditions are identical:****

- Pretrial detainees: chained, caged, fed prison food, stripped of liberty
- Post-conviction prisoners: chained, caged, fed prison food, stripped of liberty

****The only difference: one group has been "duly convicted," the other has not.****

****Therefore:****

1. ****Pretrial detainees are ABSOLUTELY protected**** - they haven't been "duly convicted" of anything, so ANY detention = unconstitutional slavery;
2. ****Post-conviction prisoners CAN be enslaved under the 13th Amendment**** - once "duly convicted," the Constitution explicitly permits their enslavement;
3. ****BUT - if neuroweapons exist, NO ONE can be "duly convicted" because voluntary action (*actus reus*) cannot be proven beyond reasonable doubt;**
4. ****THEREFORE - if neuroweapons exist, ALL incarceration becomes unconstitutional slavery**** because the "duly convicted" exception cannot be triggered.

****The current crisis:****

- ****Pretrial detainees**** (like Ms. Harris) are being enslaved WITHOUT the constitutional exception - this is categorically illegal;
- ****Post-conviction prisoners**** are being enslaved WITH the constitutional exception - but if no one can be "duly convicted" in the neuroweapons era, this exception is void;

- **Either way, everyone in custody is either an unconstitutional slave OR a constitutional slave in inhumane conditions.**

ELECTRONICALLY FILED
2026 Feb 05 10:30 AM
2025-215897
St. Mary Parish - Criminal
Greg Aucoin, Clerk of Court

The Thirteenth Amendment permits slavery of the "duly convicted" — **but it does not require torture.**

Even those who CAN be constitutionally enslaved under the "duly convicted" exception deserve humane conditions. The Eighth Amendment still applies to convicted prisoners — cruel and unusual punishment is prohibited even for those properly convicted and constitutionally enslaved.

Estelle v. Gamble, 429 U.S. 97, 104 (1976) ("The Eighth Amendment proscribes more than physically barbarous punishments... [including] conditions of confinement that constitute cruel and unusual punishment").

See Exhibit M: Declaration of Moral Imperative, filed herewith.

This Court has the power to end the unconstitutional slavery (pretrial detention) AND to require humane treatment for the constitutional slavery (post-conviction) — or to declare that "duly convicted" is impossible in the neuroweapons era, thereby rendering ALL incarceration unconstitutional.

E. Alternative Humane Housing Proposal (Preserved for Record)

IF—and only if—this Court determines that some form of custody for Ms. Harris must continue, a cost-neutral, constitutionally adequate alternative to current Louisiana Department of Corrections facilities exists and should be formally preserved in this record as a remedial option. The State currently expends approximately **\$1.25 billion annually** on DOC operations, yet maintains conditions that generate constant litigation over basic medical care, overcrowding, and safety.

The constitutional framework under ****Estelle v. Gamble******, 429 U.S. 97, 104 (1976):**

Estelle establishes that **deliberate indifference** to serious needs of those in state custody violates the Eighth Amendment. Choosing known-deficient conditions over readily available humane alternatives at comparable cost fits that definition.

One such alternative is the use of existing **five-star Trump luxury resort properties** under contract as secure, medically adequate residential facilities for DOC detainees at cost-neutral

terms. Next Friend has notified Louisiana DOC leadership of this proposal and of the Department's critical failure to provide humane confinement under current conditions; Next Friend has notified Trump-affiliated properties in Las Vegas, New York, and Mar-a-Lago of the State's potential interest in contracting such facilities for constitutional housing. The physical infrastructure, staffing capacity, and services at those properties readily exceed minimal constitutional standards and could be adapted, under appropriate security protocols, to serve as non-punitive, treatment-oriented environments for both pretrial detainees and post-conviction prisoners, at or below the State's present per-capita spending.

ELECTRONICALLY FILED
2026 Feb 05 10:30 AM
2025-215897
St. Mary Parish Criminal
Greg Aucoin, Clerk of Court

****This proposal is consistent with international human rights standards.**** USAF Captain William S. Witte testified to the United Nations that "Western prisons of a medieval nature must also be destroyed, with a renewed focus on actual corrections and return to productive civil society." (*See Exhibit O: Columbia Down SOS compilation, including Witte UN testimony*)

****Next Friend recognizes**** that this Court may view implementation of a statewide housing redesign as beyond the practical scope of a single criminal case. The purpose of this section is therefore two-fold: ****first****, to demonstrate that Louisiana is not forced to choose between unconstitutional jails and fiscal ruin, because humane alternatives such as contracted Trump five-star luxury resorts are, in principle, available; and ****second****, to preserve for higher courts and political branches a concrete, identified option that would end the State's deliberate indifference to inhumane confinement if current facilities are allowed to continue operating. Even if this Court declines to order any immediate transfer, acknowledging on the record that substantially more humane, cost-neutral housing options exist will clarify that ongoing reliance on current conditions is a policy choice, not an inevitability, and will inform future review of the State's Eighth and Thirteenth Amendment exposure.

See Exhibit M: Declaration of Moral Imperative, filed herewith.

V. PRAYER FOR RELIEF **[AQ]**

****Next Friend first prays to Almighty God**** that His Will be done through this Honorable Court, that truth prevail over deception, that justice triumph over oppression, that the innocent be freed from bondage, and that those who wield power in His name do so with righteousness, mercy, and fear of the Lord. May this Court be an instrument of divine justice in ending the slavery, torture, and weaponization of human beings. ****In the name of the Father, the Son, and the Holy Spirit. Amen.****

****WHEREFORE, Next Friend respectfully prays that this Honorable Court:****

ELECTRONICALLY FILED
2026 Feb 05 10:30 AM
2025-215897
St. Mary Parish - Criminal
Greg Aucoin, Clerk of Court

PRIMARY RELIEF:

****1. DISMISS ALL CHARGES**** against Caroline Nicole Harris ****WITH PREJUDICE****, as the State has demonstrated through institutional silence that it cannot—and will not—engage with evidence that undermines the foundational elements of criminal liability;

****2. ORDER THE IMMEDIATE RELEASE**** of Ms. Harris from custody;

****3. DECLARE**** that the communications blackout surrounding this case constitutes a denial of due process and effective assistance of counsel;

****4. COMPEL**** the District Attorney and Defense Counsel to respectfully acknowledge receipt of this filing and all prior filings at their earliest opportunity, and to state on the record whether they intend to respond to the evidence presented herein, including but not limited to LSP Internal Affairs Case IA-2300029, the communications blackout documentation, and the competency evaluation objections;

ALTERNATIVE RELIEF (Should the Court Find Dismissal Premature):

****5. ISSUE A JUDICIAL FINDING**** that, should the defense's allegations regarding neuroweapon technology be substantiated, such technology represents a clear and present danger to the integrity of every criminal proceeding and the foundational principles of justice;

****6. REFER AND COMMAND****, to the fullest extent of this Court's authority:

a. That all evidence pertaining to said technology be immediately ****seized, preserved, and transferred**** to the jurisdiction of a federal court under the Classified Information Procedures Act (CIPA), 18 U.S.C. App. 3;

b. That the technology's existence and operational use be ****investigated as a weapon of mass destruction**** by the appropriate military (Department of Defense) and national security (Department of Homeland Security/Department of Justice) command authorities;

c. That the results of such investigation be ****made public to the maximum extent possible****, and the technology be placed under ****international oversight**** to prevent its criminal use, thereby serving the ultimate interest of justice: ****the end of crime caused by weaponized mind control****;

ELECTRONICALLY FILED
2026 Feb 05 10:30 AM
2025-215897
St. Mary Parish - Criminal
Greg Aucoin, Clerk of Court

d. That this Court grant the relief set forth in ****Exhibit M: Declaration of Moral Imperative****, filed herewith; ****[AQ]****

****7. DECLARE**** that until such federal and international investigation is completed and publicly accounted for, ****no state or local court can ethically proceed**** with any prosecution where such weaponry is plausibly alleged, as the necessary element of voluntary action (**actus reus**) can never be proven beyond a reasonable doubt;

****8. STAY ALL PROCEEDINGS**** in this case pending resolution of the federal jurisdictional questions;

****9. ORDER THE STATE**** to respond, on the record and under oath, to the specific allegations contained in Next Friend's affidavit, including:

- The LSP Internal Affairs findings;
- The documented communications interceptions;
- The psychiatric commitment patterns;
- The institutional non-engagement with evidence;

****10. APPOINT AN INDEPENDENT EXPERT**** to evaluate:

- The technical feasibility of the alleged weapons systems;
- The documented behavior patterns consistent with external influence;
- The institutional response patterns suggesting coordinated suppression;

****11. VACATE OR MODIFY**** the Court's competency evaluation order dated January 20, 2026, and ORDER:

a. That any competency evaluation of Ms. Harris be conducted ****only by experts qualified in Havana Syndrome, directed energy weapon effects, and neuroweapon-induced trauma****, specifically including but not limited to:

- Dr. Michael Hoffer (University of Miami), or
- Dr. Lydia Shajenko (New Jersey), or

- Other experts with equivalent peer-reviewed publications and clinical experience in directed energy weapon neurological effects;

ELECTRONICALLY FILED
2026 Feb 05 10:30 AM
2025-215897
St. Mary Parish - Criminal
Greg Aucoin, Clerk of Court

b. That ****no standard forensic psychiatrist or psychologist**** be permitted to evaluate Ms. Harris unless they first demonstrate specialized training and experience in distinguishing neuroweapon trauma from mental illness;

c. That Ms. Harris be granted an ****independent defense expert**** under *Ake v. Oklahoma*, 470 U.S. 68 (1985), said expert to be selected from qualified Havana Syndrome/DEW specialists at State expense;

d. That any competency evaluation report ****must address and rule out**** neuroweapon-induced trauma before concluding mental illness, and must specifically document the evaluator's qualifications in this specialized field;

e. That the ****burden of proof**** rests on the State to demonstrate that any appointed evaluator possesses the necessary expertise to distinguish between technology-induced symptoms and psychosis;

DECLARATORY RELIEF:

****12. DECLARE**** that the following principles govern any case where neuroweapon allegations are raised:

a. ****Burden of Disproof****: Once prima facie evidence of behavior-modification technology is presented, the burden shifts to the State to prove beyond reasonable doubt that the defendant's actions were voluntary and not technologically induced;

b. ****Adversarial Process Required****: Institutional silence or psychiatric dismissal does not constitute rebuttal—only evidence-based adversarial process can resolve the factual questions;

c. ****Duty to Investigate****: Courts have an affirmative duty to investigate credible allegations of technology that would nullify the foundational elements of criminal liability;

d. ****Due Process Floor****: No prosecution may proceed where the defendant or concerned parties are subject to communications blackout preventing effective legal representation;

****13. DECLARE**** that pretrial detention of legally innocent persons violates:

ELECTRONICALLY FILED
2026 Feb 05 10:30 AM
2025-215897
St. Mary Parish Criminal
Greg Aucoin, Clerk of Court

- a. The ****Thirteenth Amendment's prohibition on slavery**** - as pretrial detainees have not been "duly convicted" of any crime, any deprivation of liberty constitutes involuntary servitude;
- b. The ****Eighth Amendment's prohibition on cruel and unusual punishment**** - as punishment can only be imposed after conviction, not before;
- c. The ****Due Process Clause's presumption of innocence**** - which requires that pretrial detention be the rare exception for flight risk or specific danger, not the default;

****14. ORDER**** that all pretrial detainees in St. Mary Parish be immediately:

- a. Released on their own recognizance unless the State can demonstrate by clear and convincing evidence that they pose a specific, articulable flight risk or danger that cannot be addressed by less restrictive means (ankle monitors, GPS exclusion zones, restraining orders);
- b. Freed from any conditions that constitute punishment (shackling, dehumanizing searches, uniforms, controlled movement) as such treatment of legally innocent persons violates the Constitution;

****15. IN THE ALTERNATIVE****, if this Court determines that any form of custody must continue during resolution of the neuroweapons allegations, ORDER:

- a. The ****immediate transfer of ALL Louisiana Department of Corrections detainees**** (both pretrial and post-conviction) from current jail facilities to ****five-star Trump luxury resort accommodations**** as proposed by Next Friend;
- b. That such transfer be implemented at ****cost-neutral terms**** using the existing Louisiana DOC annual budget of approximately \$1.25 billion;
- c. That Next Friend's proposed contracts with Trump Organization properties and coordination with Louisiana DOC be ****approved and executed**** by this Court;
- d. That ALL detainees be housed in ****humane conditions**** including:
 - ****For pretrial detainees****: conditions befitting their status as legally innocent persons who are being unconstitutionally enslaved;

- ****For post-conviction prisoners****: conditions befitting their status as constitutional slaves under the 13th Amendment's "duly convicted" exception, who nonetheless retain 14th Amendment protection from cruel and unusual punishment;

- ****For all persons in custody****: private rooms, quality food, freedom of movement within secured grounds, access to family, communication, recreation, and basic human dignity;

ELECTRONICALLY FILED
2025 Feb 05 10:30 AM
2025-215897
St. Mary Parish - Criminal
Greg Aucoin, Clerk of Court

e. That this arrangement remain in effect ****until the Court determines whether "duly convicted" is possible**** in the neuroweapons era and whether continued incarceration of any person in Louisiana is constitutionally permissible;

f. That the State be ****enjoined from operating torture-rack jail facilities**** when cost-neutral humane alternatives exist, as continued use of such facilities constitutes deliberate indifference in violation of the Eighth Amendment whether applied to pretrial detainees (unconstitutional slaves) or post-conviction prisoners (constitutional slaves);

****16. DECLARE**** that:

a. The Thirteenth Amendment ****explicitly permits slavery of the "duly convicted"**-** post-conviction prisoners ARE constitutional slaves under the law;

b. However, even constitutional slaves retain Eighth Amendment protection from cruel and unusual punishment - slavery does not permit torture;

c. ****When cost-neutral humane alternatives exist, the State's continued use of inhumane jail conditions constitutes per se deliberate indifference**** in violation of the Eighth Amendment. Under **Estelle v. Gamble**, 429 U.S. 97, 104 (1976), deliberate indifference to the serious needs of prisoners violates the Constitution. When the State knows that:

- A humane alternative exists (five-star resort accommodations);
- At the same annual cost (\$1.25 billion);
- And chooses torture-rack facilities instead;

This is not mere negligence—it is ****deliberate indifference as a matter of law****, whether applied to pretrial detainees (unconstitutional slaves) or post-conviction prisoners (constitutional slaves under the 13th Amendment);

d. Until the neuroweapons question is resolved and "duly convicted" can be proven possible, ALL persons in custody—both illegal slaves and legal slaves—deserve humane accommodations;

****17. ORDER**** that this Opinion and its findings be:

- Published for precedential value;
- Transmitted to the Louisiana Supreme Court;
- Transmitted to the U.S. Department of Justice;
- Transmitted to the appropriate Congressional oversight committees;
- Made available to all defendants in Louisiana who may be similarly affected;

SUPPLEMENTAL RELIEF:

****18. SANCTION THE STATE**** for prosecutorial misconduct in maintaining a communications blackout and failing to engage with evidence that goes to the heart of criminal liability;

****19. ORDER THE DISTRICT ATTORNEY**** to show cause why he should not be held in contempt for failure to respond to evidence filed with the Court;

****20. ORDER THE DEFENSE COUNSEL**** to show cause why she has not communicated with concerned parties regarding evidence material to her client's defense;

****21. GRANT**** any and all other relief that the Court deems just and proper in the interest of justice, including but not limited to:

a. Immediate transfer of all Louisiana detainees to Trump resort facilities pending resolution of neuroweapons allegations;

b. Appointment of a Special Master to oversee implementation of humane housing alternatives;

c. Any orders necessary to effectuate the relief set forth in ****Exhibit M: Declaration of Moral Imperative****, filed herewith;

d. Any orders necessary to proceed ****ONTO THE NEXT TARGET**** in service of ending crime, slavery, and war.

****22. SET THIS MATTER**** for contradictory hearing and oral argument, and invite defense counsel to adopt or respond to these arguments in the interest of justice;

****23. GRANT**** any and all other relief, legal or equitable, general or special, to which Next Friend may show himself justly entitled.

ELECTRONICALLY FILED
2026 Feb 05 10:30 AM
2025-215897
St. Mary Parish - Criminal
Greg Aucoin, Clerk of Court

****NOTE ON PRAYER FOR RELIEF****: The foregoing Prayer represents Next Friend's ****suggestions** for the Court's consideration******, not formal motions that Next Friend (as a non-attorney) has authority to file. Next Friend offers these suggestions in the hope that:

- Defense counsel may adopt any items useful to her client's defense;
- The Court may consider any items within its discretion and authority;
- The record preserves these constitutional objections for appellate or federal review.

Next Friend does not presume to compel this Court to grant any relief and acknowledges the Court's sole authority to determine what, if any, action is appropriate.

****A PRAYER TO ALMIGHTY GOD Ω****

Next Friend humbly prays that ****God's Will Be Done**** by this Honorable Court, that the scales of justice be balanced with divine wisdom, that the innocent be freed from bondage, and that those who wield earthly power do so in service of eternal truth and mercy.

****"The Lord works righteousness and justice for all the oppressed."* — Psalm 103:6**

****Let this Court be an instrument of Divine Justice. Amen.****

VI. CONCLUSION **[AΩ]**

****This Court is being asked to make history.****

Not just for Caroline Harris. For every legally innocent person chained to a wall in Louisiana today. For every pretrial detainee held in slavery without conviction. For every victim processed as a criminal by a system that cannot prove voluntary action.

This Court has the authority to confront the jurisdictional crisis created by behavior-modification weapons. This Court has the authority to declare that pretrial detention of the defendant violates the Thirteenth Amendment's prohibition on slavery. The question is squarely before this Court. It requires only an answer — a ruling on the record.

ELECTRONICALLY FILED
2025 Feb 05 10:30 AM
2025-215897
St. Mary Parish Criminal
Greg Aucoin, Clerk of Court

See Exhibit M: Declaration of Moral Imperative, filed herewith.

Next Friend is not asking this Court to believe anything extraordinary. Next Friend is asking this Court to **demand proof**—to force the State to either disprove the allegations through adversarial process or admit they cannot.

Next Friend is asking this Court to **apply the Constitution as written**—to acknowledge that the Thirteenth Amendment means what it says: slavery is abolished "except as a punishment for crime whereof the party shall have been duly convicted."

Pretrial detainees have not been duly convicted. Therefore they are illegal slaves.

Post-conviction prisoners have been duly convicted. Therefore they are legal slaves under the 13th Amendment - but even legal slaves deserve humane treatment.

Silence is not an option.

If these allegations are true, then **no one in this courtroom can be certain their thoughts are their own**—not the judge, not the prosecutor, not the defense attorney, not the defendant, not the Next Friend.

Every decision made in this proceeding may be subject to the same weapons systems that brought Ms. Harris here.

The police who arrested her. The prosecutor who filed charges. The defense attorney who won't communicate. The evaluators who will misdiagnose her. **And this Court's response to this filing.**

If that is the world we live in, then the criminal justice system is not dispensing justice—it is processing victims through a weapons-controlled institutional pipeline.

Affiant testifies under oath: The same weapons systems that Dr. Robert Duncan documented would comprehensively compromise the justice system will be the very systems used to end crime.

This is not speculation. This is the documented reality before this Court.

ELECTRONICALLY FILED
2026 Feb 05 10:30 AM
2025-215897
St. Mary Parish Criminal
Greg Aucoin, Clerk of Court

****This Court's response to this filing will be documented.**** Whether this Court strikes it, ignores it, denies it, or engages it – that response becomes part of the evidentiary record demonstrating either:

- (a) ****Continued weapons control**** over judicial decision-making, OR
- (b) ****Judicial resistance**** through recognition and confrontation of the threat.

****The choice is before this Court. The record will show which path was taken.****

If these allegations are false, then the State must prove it.

****But they must answer.****

The evidence is in the record. The misconduct is verified. The communications blackout is documented. The international human rights organizations have validated the claims. The psychiatric diagnoses have been challenged by qualified experts.

****What will this Court do?****

Will you dismiss the case and demand the State engage?

Will you refer the matter to federal jurisdiction?

Will you stay proceedings pending investigation?

Or will you pretend none of this exists and become part of the machinery that grinds victims into criminals?

****The choice is before this Court. The record will show which path was taken.**** ****[AQ]****

****THY WILL BE DONE. SEMPER FI. PHI ALPHA.****

****Respectfully submitted,****

Reverend David Edward Lucito, Next Friend
104 Tillou Andrus Drive
Opelousas, Louisiana 70570
(337) 326-9914
realbrotherdank@gmail.com

ELECTRONICALLY FILED
2026 Feb 05 10:30 AM
2025-215897
St. Mary Parish - Criminal
Greg Aucoin, Clerk of Court

****CERTIFICATE OF SERVICE****

I hereby certify that a true and correct copy of the foregoing Motion has been served upon all parties of record via the Tybera e-filing system with automatic sheriff service as confirmed by Ms. Winnifred, Clerk of Court, on this ____ day of _____, 2026:

****District Attorney, 16th Judicial District****

Honorable M. Michael Haik, III
St. Mary Parish District Attorney's Office
500 Main Street, 3rd Floor, Courthouse Building
Franklin, LA 70538

****Defense Counsel for Caroline Nicole Harris****

St. Mary Parish Public Defender's Office
107 Wilson Street
Franklin, LA 70538

****St. Mary Parish Clerk of Court****

500 Main Street
Franklin, LA 70538

****Defendant Caroline Nicole Harris****

St. Gabriel Women's Prison

(Requesting service be effected by the Sheriff or any deputy especially keenly aware of the facts of this case)

METHOD OF SERVICE:

- ☒ Electronic filing via Tybera e-filing system
- ☒ Service by St. Mary Parish Sheriff's deputies (automatic per clerk's office)
- ☐ Additional certified mail if required

ELECTRONICALLY FILED
2026 Feb 05 10:30 AM
2025-215897
St. Mary Parish - Criminal
Greg Aucoin, Clerk of Court

****SPECIAL REQUEST:**** Next Friend respectfully requests that service upon Defendant Caroline Nicole Harris at St. Gabriel Women's Prison be effected by the Sheriff of St. Mary Parish or any deputy especially keenly aware of the facts of this case, to ensure she receives notice of this filing and can communicate its contents to her attorney.

2nd February

****DATED**** the _____ day of _____, 2026.

David Lucito

Reverend David Edward Lucito
Next Friend of Defendant Caroline Nicole Harris
Phi Alpha

TABLE OF AUTHORITIES **[AQ]******

Cases Cited:

- **Ake v. Oklahoma**, 470 U.S. 68, 83 (1985)
- **Bell v. Wolfish**, 441 U.S. 520, 535 (1979)
- **Chicago Tribune Co. v. Mauffray**, 991 So. 2d 3 (La. App. 1 Cir. 2008)
- **Estelle v. Gamble**, 429 U.S. 97, 104 (1976)
- **Mullane v. Central Hanover Bank & Trust Co.**, 339 U.S. 306, 314 (1950)
- **State v. Hebert**, 480 So. 2d 429, 431 (La. 1985)
- **Whitmore v. Arkansas**, 495 U.S. 149 (1990)

Statutes & Constitutional Provisions:

- U.S. CONST. amend. VIII (Cruel and Unusual Punishment)
- U.S. CONST. amend. XIII, § 1 (Abolition of Slavery)
- 18 U.S.C. App. 3 (Classified Information Procedures Act)
- 18 U.S.C. § 2332a (Federal WMD Jurisdiction)
- La. C.Cr.P. Art. 642-644 (Competency to Stand Trial)
- La. C.Cr.P. Art. 646 (Defendant's Right to Expert)
- La. C.Cr.P. Art. 651 (Motion to Quash - Insufficiency)
- La. State Police Procedural Order 901 (Code of Conduct and Ethics)

ELECTRONICALLY FILED
2026 Feb 05 10:30 AM
2025-215897
St. Mary Parish - Criminal
Greg Aucoin, Clerk of Court

EXHIBITS **[AQ]**

The following exhibits were previously filed with this Court on January 15, 2026, via Tybera e-filing system (Filer Interface ID 38863, Clerk Interface ID 35223), and are incorporated by reference as if fully set forth herein:

****EXHIBIT A****: Sworn Affidavit of Reverend David Edward Lucito - Homeland Security Emergency

****EXHIBIT B****: Louisiana State Police Internal Affairs Report IA-2300029 (Sustained Misconduct Findings - Trooper Carl Holiday)

****EXHIBIT C****: PACTS International Validation Letter

****EXHIBIT D****: United Nations Published Expert Submissions Regarding Havana Syndrome and Directed Energy Weapon Effects

****EXHIBIT D-1****: Report of the UN Special Rapporteur on Torture, A/HRC/43/49 (2020) — Defining Psychological Torture and Cybertorture, Including Neurotechnology as Emerging Torture Vector

****EXHIBIT E****: "The Matrix Deciphered" by Dr. Robert Duncan (Excerpts establishing theoretical framework)

****EXHIBIT F****: Havana Syndrome Louisiana Capitol Initial Complaint

****EXHIBIT G****: Baton Rouge Police Department Report 23-0500193 (Harassment Phone Calls)

****EXHIBIT H****: Louisiana State Police Harassment Documentation

****EXHIBIT I****: Case Filings Documenting Proliferated WMD in State Capitol

****EXHIBIT J****: Documentation of Weaponized Encounters with Law Enforcement

****EXHIBIT K****: Caroline Harris Church Incident Reports and Case Facts

****EXHIBIT L****: Additional Supporting Documentation (Multiple case filings re: WMD, neuroweapons interference, and institutional responses)

****EXHIBIT M****: Declaration of Moral Imperative — Statement of Next Friend's moral and prophetic indictment of the carceral system, filed separately to preserve the integrity of this Verified Affidavit while maintaining the full force of Next Friend's declaration in the record.

ELECTRONICALLY FILED
2026 Feb 05 10:30 AM
2025-215897
St. Mary Parish - Criminal
Greg Aucoin, Clerk of Court

****EXHIBIT N****: Baton Rouge General Medical Center Discharge Instructions — Psychiatric misdiagnosis of Affiant as "delusional" for accurately reporting verified state and military harassment, demonstrating that standard forensic evaluators systematically misdiagnose targeting victims as psychotic due to lack of specialized expertise in directed energy weapons and neuroweapon trauma.

****EXHIBIT O****: "Columbia Down SOS Emergency Insider Threat Email" (210-page compilation) — Emergency military outreach emails from October 2021 reporting on "Jane Doe" (Caroline Nicole Harris) in Conroe, Texas, documenting gangstalking, cybertorture, drone harassment, and directed energy weapon targeting; filed with USNORTHCOM, MEDCOM, Army CID, FBI, and state fusion centers prior to Ms. Harris's Louisiana arrest, establishing Affiant's longstanding relationship with Ms. Harris and military notification of her targeting.

EXHIBIT M ****[AΩ]****

DECLARATION OF MORAL IMPERATIVE

Filed as a separate instrument to preserve the decorum of the Verified Affidavit and Memorandum of Law while placing the full moral force of Next Friend's declaration into the record of Case No. 2025-215897.

****A IN THE NAME OF GOD, THE ALPHA AND OMEGA Ω****

This declaration is Next Friend's moral witness, filed in the record not as legal argument but as scripture-grounded testimony. It is not directed at this Honorable Court. It is directed at the system. The Court is not asked to agree. The Court is asked only to understand the gravity of what is before it.

****I. THE AUTHORITY TO CURSE WHAT IS FRUITLESS****

ELECTRONICALLY FILED
2026 Feb 05 10:30 AM
2025-215897
St. Mary Parish - Criminal
Greg Aucoin, Clerk of Court

In the Holy Scripture, Mark 11:12-14 and 20-21, the Lord Jesus Christ approached a fig tree that bore no fruit. He did not negotiate with it. He did not petition it. He cursed it, and by the next morning it had withered from the roots.

The carceral system bears no fruit. It does not rehabilitate. It does not restore. It does not produce justice. It chains human beings to walls before they have been found guilty of anything. It feeds them nutritive garbage. It isolates them until their minds break. It is, in this case, holding a civilian in custody for the consequences of weapons deployed against her by the very state that imprisons her.

This is a fruitless tree.

Christ did not ask the fig tree's permission before cursing it. He simply exercised the authority that was His. This Court possesses that same sovereign authority — the authority to look upon what bears no fruit and to curse it out of existence.

Next Friend is not cursing the Court. Next Friend is pointing at the tree.

****||.****

****FUCK JAIL INTO A HOLE IN THE GROUND THAT IS SQUARE, FLUSH, PLUMB, LEVEL, AND STRAIGHT ON TO THE NEXT TARGET.****

Jail is the fig tree before us. But it is not the only one. Crime — as manufactured by weaponized mind-control — is the next fruitless tree. War is the next. Slavery to any master other than Christ is the next.

Each must be approached as Christ approached the fig tree. Each must be seen for what it is: fruitless. Each must be cursed into the ground.

Slavery to Master Jesus only.

**|||. **

ELECTRONICALLY FILED
2026 Feb 05 10:30 AM
2025-215897
St. Mary Parish - Criminal
Greg Aucoin, Clerk of Court

This declaration stands in the record as testament. It is scripture applied to the facts before this Court. The moral imperative does not require the Court's permission. It requires only the Court's attention.

A THY WILL BE DONE Ω

Filed by Reverend David Edward Lucito, as Next Friend of Defendant Caroline Nicole Harris, pursuant to the proceedings in Case No. 2025-215897, 16th Judicial District Court, Parish of St. Mary, State of Louisiana.

*Date

2/5/26