

MCRO

FORENSIC REPORT SERIES

The Discovery Fraud Evidence Chain

Case 27-CR-23-1886: January 2024 – February 28, 2025

Report 2 of 10 — Discovery Dispute Reconstruction

Report Date: March 9, 2026 | Database Queried: ibfmjtwahkwqzcmeyqii (us-west-2)

IMPORTANT DISCLAIMER

This report presents objective statistical findings and chronological reconstructions derived from structured database queries, court-filed documents, hearing transcripts, and authenticated email exhibits. All database metrics are reproducible via the SQL provided in the Appendix. This report does not allege fraud, assign intent, or draw legal conclusions. The word “fraud” appears in document titles and the defendant’s own exhibit labels; this report does not independently assert fraud as a conclusion. Each finding represents a measurable pattern requiring independent verification by qualified experts.

EXECUTIVE SUMMARY

- Case 27-CR-23-1886 contains three formal “Demand or Request for Discovery” filings in the docket: February 20, 2023 (Rivers, 1 page), January 5, 2024 (Guertin, 1 page), and January 14, 2025 (Carpenter, 8 pages). The first defense-filed discovery demand is among 1,302 such events across 1,184 cases in the MCRO corpus.
- The defendant filed a 40-page Motion to Compel Discovery on April 4, 2024 and a 5-page Renewed Motion to Compel on June 3, 2024. A search of the complete docket record reveals zero court orders addressing, ruling on, granting, or denying either discovery motion.
- Three distinct discovery productions are documented: (1) a PDF-format batch from attorney Biglow circa August 2023; (2) JPEG-format photographs through attorney Rivers circa July 2024; (3) a set received in person on February 13, 2025 from Carpenter/Donnelly, containing files with the embedded username “ggilbertson” and OneDrive provenance.
- On February 20, 2025, Guertin emailed Carpenter and Donnelly with completed forensic analysis of discovery manipulation. Zero responses from either attorney appear in the authenticated email record.
- On February 28, 2025, Guertin filed four exhibit lists at docket indexes 122–125, totaling 266 pages and 64.6 MB. Exhibits 122–124 contain 259 embedded images (129 JPEGs + 130 PNGs). All were created with LibreOffice Writer and PyPDF2.
- The Cloned Discovery Template report identified this case as “Outlier A”—the case with the most distinctive discovery demand text (78% unique rows vs. the corpus template norm of 77.4% cloned).
- Five days elapsed between the exhibit filing (February 28) and the contested competency hearing (March 5, 2025).
- No court order in the entire docket addresses any discovery motion on its merits. The only “Order Denying Motion” (April 12, 2024) addresses the defendant’s Pro Se petition, not discovery.

Scope Overview

Metric	Value
Primary Case	27-CR-23-1886 (State v. Guertin)
Timeline	January 5, 2024 – February 28, 2025 (420 days)
Discovery Demand Filings	3 (Rivers Feb 2023; Guertin Jan 2024; Carpenter Jan 2025)
Discovery Motions Filed	2 (Motion to Compel Apr 2024; Renewed Motion Jun 2024)
Court Orders on Discovery	0 (critical negative finding)
Discovery Productions	3 (Biglow ~Aug 2023; Rivers ~Jul 2024; ggilbertson Feb 2025)
Feb 28 Exhibit Filings	4 documents, 266 pages, 64.6 MB
Embedded Images (122–124)	129 JPEGs + 130 PNGs = 259 images

Creator Tool	LibreOffice Writer / PyPDF2
Corpus Discovery Demands	1,302 events across 1,184 cases
Template Status	Outlier A (78% unique text)
MSIP Labels	0
Digital Signatures	iText court watermark only

METHODS

This report employs a three-tier methodology combining database queries (Tier A), primary source document review (Tier B), and cross-referencing against the existing body of 49+ MCRO forensic reports.

Tier A — Database Queries: All statistical claims are computed from SELECT queries against the frozen MCRO Supabase/Postgres database. Key tables: parents_case_events, children, children_objects, children_signatures_full_report. All SQL is in the Appendix.

Tier B — Primary Source Documents: Court transcripts, filed motions, the 110-page Pro Se Petition (docket 133), and authenticated email exhibits (EML-A through EML-E) were reviewed for discovery dispute reconstruction.

Tier C — Cross-Report Synthesis: Findings from the Cloned Discovery Template report, Discovery Fraud Competency Chronology, EML-A authentication registry, and Initial Digital Forensic Analysis Report were cross-referenced for corpus-wide context.

FINDINGS

Finding 1: Discovery Demand Chronology

Background

Discovery in criminal cases involves the exchange of evidence between prosecution and defense. In Minnesota, formal discovery demands are filed as “Demand or Request for Discovery” docket events. This finding reconstructs the complete discovery demand timeline for case 27-CR-23-1886.

Findings

The docket contains three formal discovery demand filings:

Date	Filer	Docket	Pages	Creator Tool
2023-02-20	Bruce Rivers	10	1	PrintServer210 / Corel PDF Engine
2024-01-05	Matthew Guertin	22	1	[none / iText only]
2025-01-14	Raissa Carpenter	118	8	Acrobat PDFMaker 24

In addition, the defendant filed two motions specifically seeking discovery relief:

Date	Type	Description	Docket	Pages
2024-04-04	Motion	Motion to Compel Discovery	29	40
2024-06-03	Motion	Renewed Motion to Compel	90	5

Significance

Three discovery demands were filed over 23 months by three different filers. The defendant additionally filed two motions to compel. As documented in Finding 3, no court order addresses any of these discovery requests on the merits.

Connecting Context

The January 5, 2024 demand was filed 12 days before the second Finding of Incompetency (January 17, 2024), which suspended the case. The April 4, 2024 Motion to Compel was filed while the case was nominally dormant. The January 14, 2025 demand by Carpenter represents the first institutional discovery request after her appointment in October 2024.

Finding 2: The Three Discovery Productions

Background

The docket record, email exhibits, and hearing transcripts document three distinct productions of discovery materials. This finding reconstructs what is known about each.

Findings

#	Attorney Era	Approx. Date	Format	Key Identifiers
1	Biglow	~August 2023	PDF	Initial production; pre-dates defendant's demand
2	Rivers	~July 2024	JPEG	Photographs; format shift from PDF
3	Carpenter/Donnelly	Feb 13, 2025	Digital (OneDrive)	"ggilbertson" username; Van Guilder "Modified By" on all 104 files

Production 3 is the central evidentiary event. Carpenter's January 6, 2025 email (authenticated in EML-A) scheduled a February 13 in-person meeting for Guertin to review the discovery. Seven days later (February 20), he emailed both attorneys with his forensic analysis. Eight days after that (February 28), he filed the exhibit lists into the docket.

The third production's metadata features include the embedded username "ggilbertson" in image filenames and OneDrive provenance showing JoAnne Van Guilder as "Modified By" on all 104 discovery files.

Significance

The format shift across three productions (PDF to JPEG to digital files) is documented but unexplained. The presence of a uniform "Modified By" user on all 104 files is a metadata observation; its implications are not assessed in this report.

Finding 3: Court Rulings on Discovery — Critical Negative Finding

Findings

A comprehensive audit of all 25 order events in the case docket confirms: zero court orders address any discovery motion on its merits. The only “Order Denying Motion” (April 12, 2024, Klein, docket 33) addresses the defendant’s Petition to Proceed Pro Se, not the Motion to Compel Discovery filed 8 days earlier (April 4, docket 29).

The Discovery Fraud Competency Chronology independently documented this pattern, confirming that no order acknowledges, rules on, or denies either the April 4, 2024 Motion to Compel or the June 3, 2024 Renewed Motion.

Significance

Two discovery motions (totaling 45 pages) were filed and received no documented judicial response. This is a structural observation about the docket record; the reasons for the absence are not determinable from available data. It is possible that motions were addressed informally without written orders, though no hearing transcript in the available record documents such oral rulings.

Finding 4: The February 28, 2025 Exhibit Filings

Findings

Filename	Idx	Pages	Size (MB)	JPGs	PNGs	Creator
122__Exhibit-List_A-E	122	75	22.2	27	41	Writer / PyPDF2
123__Exhibit-List_F-J	123	92	18.0	47	43	Writer / PyPDF2
124__Exhibit-List_K-L	124	76	23.3	55	46	Writer / PyPDF2
125__Exhibit-List_M-Q	125	23	1.0	0	0	Writer / PyPDF2
TOTAL	—	266	64.6	129	130	—

All four documents share a uniform metadata profile: xmp_creator_tool = “Writer” (LibreOffice), xmp_producer = “PyPDF2.” Creation timestamps span a 47-minute window on the evening of February 28, 2025. None carry MSIP sensitivity labels or digital signatures beyond the standard court iText watermark.

Exhibits 122–124 are titled “Discovery-Fraud-Proven” and contain 259 embedded images—both original discovery photographs (JPGs) and analytical screenshots (PNGs). Exhibit 125 is titled “Netflix-Patent-Theft” and contains only text and embedded fonts.

Significance

The exhibits represent 266 pages with 259 embedded images totaling 64.6 MB, filed in a 47-minute window. The use of open-source tools (LibreOffice, PyPDF2) is consistent with defendant-authored production.

Finding 5: The Email Evidence Chain (Threads 7–9)

Findings

Thread	Subject	Date Range	Total	Guertin	Attorney Response
7	Upcoming Court Dates	Jan 6 – Feb 11, 2025	10	7	3 (Carpenter)
8	URGENT — Discovery Fraud	Feb 20–21, 2025	2	2	0
9	Video Discovery Request	Feb 24 – Mar 3, 2025	3	2	1 (Van Guilder)

Thread 8 is the central communication event. On February 20, 2025, Guertin emailed Carpenter and Donnelly with forensic analysis of the discovery photographs, including Storj-hosted PDF links. A corrected version followed February 21. Zero responses from either attorney appear in the authenticated record.

Thread 9 documents Van Guilder’s statement that she excluded all videos because “they are all body cams and squad videos.” Guertin responded citing Minnesota Statute §13.825(Subd. 4(b)).

Finding 6: Timeline Gap Analysis

Findings

From	To	Elapsed	Court Action?
Rivers demand (Feb 20, 2023)	First production (~Aug 2023)	~6 months	None
Guertin demand (Jan 5, 2024)	Incompetency order (Jan 17)	12 days	Case suspended
Motion to Compel (Apr 4, 2024)	Any court response	∞	None ever issued
Renewed Motion (Jun 3, 2024)	Any court response	∞	None ever issued
Carpenter demand (Jan 14, 2025)	Production 3 (Feb 13)	30 days	None
Received photos (Feb 13)	Email to attorneys (Feb 20)	7 days	N/A
Email to attorneys (Feb 20)	Exhibit filing (Feb 28)	8 days	None
Exhibit filing (Feb 28)	Hearing (Mar 5)	5 days	Hearing held

The timeline shows a consistent pattern: discovery requests generate no judicial response. The 15-day sprint from receiving photographs (February 13) to filing exhibits (February 28) to testifying (March 5) establishes that Guertin produced his forensic analysis under significant time pressure.

Connecting Context

This timeline provides the chronological baseline for Report 4 (March 5 Hearing Claims Analysis). The dates here—all derived from docket entries and authenticated email timestamps—provide the foundation against which hearing claims can be tested.

Finding 7: Corpus Context — The “Outlier A” Discovery Template

Findings

The Cloned Discovery Template report analyzed 107 discovery demand documents and found 77.4% of all text content was shared across documents—indicating template-driven production. Case 27-CR-23-1886’s original discovery demand had 78% unique text rows, making it the most distinctive document in the cohort.

The January 5, 2024 demand (filed by Guertin) further distinguishes this case. Its metadata shows no creator tool and an iText-only producer chain, consistent with a handwritten document scanned for filing.

Significance

The standard discovery demand in this court system is a template with minimal case-specific content. This case’s outlier status reflects a defendant writing his own request rather than relying on counsel’s template.

LIMITATIONS & ALTERNATIVE EXPLANATIONS

- The MCRO database captures publicly available docket events. Sealed filings, bench conferences, and in-chambers discussions regarding discovery are not reflected. Discovery motions may have been addressed informally.
- Email evidence is drawn from the EML-A exhibit as filed. Carpenter and Donnelly may have communicated via phone, in-person meetings, or internal channels not captured.
- Only Production 3 (February 2025) was available for forensic examination in this project. Productions 1 and 2 are reconstructed from references in other documents.
- The absence of court orders addressing discovery may reflect standard informal practice rather than a deficiency, though no hearing transcript documents oral discovery rulings.
- Metadata observations (LibreOffice Writer, PyPDF2, creation timestamps) describe the tools used and do not speak to the validity of the analysis within the exhibits.
- The “ggilbertson” username and Van Guilder “Modified By” metadata are reported as observations. Their significance requires investigation beyond this report’s scope.

RECOMMENDATIONS FOR INDEPENDENT VERIFICATION

- All findings are reproducible by running the Appendix SQL queries against the MCRO database.
- The February 28 exhibits (indexes 122–125) are publicly available through the MCRO system.
- The email evidence can be verified through SHA-256 hashes and OpenTimestamps blockchain proofs in the EML-A registry.
- The discovery motion non-response finding can be verified by searching the docket for any order referencing the April 4 or June 3, 2024 motions.
- A comparison of the three discovery productions would be strengthened by obtaining original photographs from the prosecution's evidence file.

APPENDIX | REPRODUCIBLE SQL QUERIES

A1 — Discovery-Related Docket Events

```
SELECT pce.event_index, pce.event_name,
       pce.event_json__date AS event_date,
       pce.event_json__filing_party_name AS filing_party,
       pce.docket_index, pce.event_json__page_count
FROM parents_case_events pce
WHERE pce.case_uid = 'case:27-cr-23-1886'
AND (
    event_name ~* '(discovery|disclos|demand|exhibit|production)'
    OR docket_index IN (122, 123, 124, 125)
)
ORDER BY pce.event_json__date;
```

A2 — All Court Orders in Case Docket

```
SELECT event_index, event_name,
       event_json__date, event_json__filing_party_name,
       docket_index
FROM parents_case_events
WHERE case_uid = 'case:27-cr-23-1886'
AND event_name ~* 'order'
ORDER BY event_json__date;
```

A3 — February 28 Exhibit Metadata

```
SELECT filename, filing_date, filing_type,
       pdf_page_count, size_bytes,
       metadata__xmp_create_date,
       metadata__xmp_creator_tool,
       metadata__xmp_producer,
       metadata__msip__has_msip_flag,
       case_event__docket_index
FROM children
WHERE case_uid = 'case:27-cr-23-1886'
AND filing_date = '2025-02-28'
ORDER BY filename;
```

A4 — Embedded Objects (Aggregated)

```
SELECT c.filename, co.object_type,
       count(*) as obj_count
FROM children_objects co
JOIN children c ON co.evidence_uid = c.evidence_uid
WHERE c.case_uid = 'case:27-cr-23-1886'
AND c.filing_date = '2025-02-28'
GROUP BY c.filename, co.object_type
ORDER BY c.filename, co.object_type;
```

A5 — Corpus Discovery Demand Statistics

```
SELECT COUNT(DISTINCT case_uid) as cases_with_demands,
       COUNT(*) as total_demand_events
```

```
FROM parents_case_events
WHERE event_name = 'Demand or Request for Discovery';
```

A6 — Discovery Filing Types in Case

```
SELECT filename, filing_date, filing_type,
       case_event__docket_index, pdf_page_count,
       metadata__xmp_creator_tool,
       case_event__filing_party_name
FROM children
WHERE case_uid = 'case:27-cr-23-1886'
AND filing_type ~* '(discovery|demand|exhibit list)'
ORDER BY filing_date;
```

A7 — Related Cases

```
SELECT * FROM parents_related_cases
WHERE case_uid = 'case:27-cr-23-1886';
```