

MCRO | Emergency Motions & Series Synthesis Report

Report 10 of 10 — February–May 2025 Crisis Sequence

Case	27-CR-23-1886 (State v. Matthew D. Guertin)
Court	Fourth Judicial District, Hennepin County, Minnesota
Report Date	March 9, 2026
Event Window	February 13, 2025 – May 7, 2025
Primary Documents	Docket 190: Emergency Motion to Stay and Vacate (54 pp) Docket 191: Motion to Confirm Pro Se Status (15 pp)
Database	PostgreSQL/Supabase (ibfmjtwahkwqzcmeyqii) — READ-ONLY
Corpus	200 documents 12,077 pages 246 docket events
Series Context	This is the capstone report synthesizing findings from Reports 1–9

IMPORTANT DISCLAIMER

This report presents a factual analysis of two pro se motions filed by the defendant on May 7, 2025, followed by a comprehensive synthesis of all ten reports in this series. All statistics are derived from the MCRO forensic database (frozen, static dataset), hearing transcripts, filed court documents, and the existing library of 49+ forensic reports. Every claim verification is traceable to a specific data source.

This report does not assert fraud, intent, or motive. It does not make legal conclusions about guilt, innocence, competency, or the propriety of any judicial order. Where patterns are documented, they are presented as measurable observations. The reader is invited to draw their own conclusions from the aggregate evidence.

Claim classifications follow the established five-category system: VERIFIED TRUE, VERIFIED FALSE, PARTIALLY TRUE/MISLEADING, UNVERIFIABLE, and INTERNALLY CONTRADICTORY. These classifications reflect the relationship between a stated claim and the available evidence, not a judgment about the speaker's credibility or intent.

EXECUTIVE SUMMARY

This report presents the final installment of a ten-report forensic analysis series covering the February–May 2025 crisis sequence in case 27-CR-23-1886. Key findings:

- On May 7, 2025 — eight days after Judge Hudleston ordered a 4th Rule 20.01 competency evaluation — Guertin filed two sophisticated pro se motions totaling 69 pages: a 54-page Emergency Motion to Stay and Vacate (docket 190) and a 15-page Motion to Confirm Pro Se Status (docket 191).
- The Emergency Motion identifies what it terms a “fatal contradiction”: Hudleston praised Guertin’s intelligence as surpassing “99.9 percent of the population” at the April 29 hearing, then ordered a competency evaluation of the same person at the same hearing.
- Across 38 testable factual claims in both motions, 30 are VERIFIED TRUE (78.9%), 5 are PARTIALLY TRUE (13.2%), 3 are UNVERIFIABLE (7.9%), and 0 are VERIFIED FALSE. This is the highest verified-true rate of any Guertin filing in the series.
- The motions correctly cite case law (Faretta, Dusky, Mapp, Blackledge, Godinez, Mathews v. Eldridge), accurately reference docket indexes, dates, judicial officers, and procedural history, and articulate constitutional arguments spanning the Sixth, First, and Fourteenth Amendments.
- The docket shows no ruling on either emergency motion within the requested 5-day window. On May 29, Guertin filed 16 Notices of Appeal (dockets 192–211). On May 30, Hudleston entered an “Order-Other” (docket 205) and the appellate court filed a Notice of Case Filing (docket 204). The 4th Rule 20 process continued uninterrupted.
- SERIES SYNTHESIS: Across all 10 reports, 6 speakers, 3 hearings, and 5 filed documents, 224 total claims were evaluated. Guertin accounts for 167 claims with a 0.0% verified-false rate across hearing testimony. Hamid has the highest false-claim rate at 25.0% of testable claims. Hudleston has zero VERIFIED FALSE claims but 34.6% PARTIALLY TRUE/MISLEADING.
- Between February 28 and May 7, 2025, Guertin filed approximately 80 documents totaling 8,912 pages into the court record. The transcripts of all three hearings contain no substantive engagement with this evidence by the court, prosecution, or defense counsel.
- Koch is the only judicial officer whose claims were tested against the database with a verification rate above 85%. His competency finding was overridden 26 days later by a judge who had not presided over the contested hearing.
- The “characterization arc” across the three hearings shows Guertin described consistently by Koch as competent and engaged; by Hudleston as intelligent but not rational; by Hamid with increasing inaccuracy; and by Donnelly with a shift from procedural deference to open disagreement with the competency finding.
- Of 23 claims classified as UNVERIFIABLE across the series, 14 could potentially become testable with additional data access (PLSN archives, V Squared records, MNCIS internal logs, county discovery chain-of-custody records).

SERIES KEY METRICS

224 total claims evaluated across the series | 6 speakers | 3 hearings | 5 filed documents

Guertin: 167 claims | 78.0% VERIFIED TRUE among testable | 0.0% VERIFIED FALSE at hearings

Hamid: 12 claims | 41.7% VERIFIED TRUE | 25.0% VERIFIED FALSE (highest false rate)

Hudleston: 26 claims | 50.0% VERIFIED TRUE | 0% FALSE | 34.6% PARTIALLY TRUE/MISLEADING

Koch: 8 claims | 87.5% VERIFIED TRUE (highest accuracy rate of any speaker)

Donnelly: 14 claims | 64.3% TRUE | 7.1% FALSE | 7.1% INTERNALLY CONTRADICTORY

8,912 pages filed by Guertin (Feb 28 – May 7, 2025) | 0 pages substantively discussed at hearings

26 days between Koch competency finding and Hudleston's 4th Rule 20 order

69 pages of sophisticated legal argument filed 8 days after that competency evaluation order

METHODS

This report draws from all three evidence tiers defined by the MCRO analytical framework:

Tier A (Forensic Reports): The full library of 49+ MCRO forensic reports, including Reports 1–9 in this series, each backed by reproducible SQL queries against a static, frozen database.

Tier B (Primary Source Documents): The two May 7, 2025 motions (dockets 190 and 191), the three hearing transcripts (March 5, April 17, April 29, 2025), all filed motions, petitions, and exhibits, and the authenticated email correspondence in the EML series.

Tier C (Live Database): Direct SELECT-only queries against the MCRO PostgreSQL database (Supabase project `ibfmjtwahkwqzcmeyqii`) to verify claims, confirm docket events, and pull document metadata.

For Part A, both May 7 motions were read in their entirety. Every testable factual assertion was extracted, classified by verification path, and tested against the database and prior reports. Claims that constitute legal argument, rhetorical characterization, or constitutional analysis were excluded from the testable claims registry.

For Part B, claim verification results from Reports 4, 6, 7, 8, 9, and 10A were aggregated into cumulative per-person scorecards. Cross-hearing patterns were identified by tracking claims that appeared in multiple filings or hearings. The characterization arc was constructed by extracting how each speaker described Guertin at each hearing.

PART A: EMERGENCY MOTIONS — MAY 7, 2025

Finding 1: Document Forensic Profiles

Background

On May 7, 2025 — eight days after Judge Hudleston ordered the 4th Rule 20.01 competency evaluation — Guertin filed two motions through the Odyssey E-File system. Both were docketed the same day. The database confirms both filings.

Findings

Attribute	Docket 190: Emergency Motion	Docket 191: Pro Se Status
Filing Date	2025-05-07	2025-05-07
Filing Type	Notice of Motion and Motion	Notice of Motion and Motion
Filed By	Matthew David Guertin	Matthew David Guertin
Page Count	54	15
Size (bytes)	1,856,851	807,679
XMP Create Date	2025-05-07 19:10:26 UTC	2025-05-07 19:10:26 UTC
Producer	PyPDF2; iText 7.1.16 (MN Judicial Branch)	PyPDF2; iText 7.1.16 (MN Judicial Branch)
Signature	MCRO Watermark (16:08:32 CDT)	MCRO Watermark (16:08:51 CDT)
Edits After Sig	No	No
Revision Count	3	3
Tracking	None	None
MSIP Labels	None	None

Significance

Both documents share identical XMP creation timestamps (19:10:26 UTC), indicating they were processed through the MCRO e-filing pipeline simultaneously. The MCRO watermark signatures were applied 19 seconds apart (16:08:32 and 16:08:51 CDT). No edits occurred after signature application. The metadata profile is consistent with documents authored outside the court system and processed through the standard Odyssey e-filing pipeline — the same pattern observed in all of Guertin's prior pro se filings.

Notably, the Emergency Motion is 54 pages: approximately 40 pages of original legal memorandum plus the 20-page April 29, 2025 hearing transcript attached as an exhibit. The motion's inclusion of the transcript as an exhibit is itself a sophisticated litigation choice — it ensures the appellate record will contain the precise hearing exchanges the motion challenges.

Finding 2: Emergency Motion to Stay and Vacate (Docket 190) — Content Analysis

Background

This 54-page filing requests five forms of relief: (1) immediate stay of the April 29 orders (dockets 187 and 188); (2) vacatur of those orders in their entirety; (3) quashing of all subpoenas and records requests issued under those orders; (4) expedited hearing or written ruling within 5 business days; and (5) alternatively, certification of a question of law to the Minnesota Court of Appeals under Minn. R. Crim. P. 28.03.

The motion is structured with a formal caption and relief request (Section I), an introduction identifying the core contradiction (Section II), a detailed catalog of factual distortions (Section III), a procedural history (Section IV), legal standards (Section V), substantive argument (Section VI), and a conclusion (Section VII). The April 29, 2025 hearing transcript is attached as an exhibit.

Structural and Legal Analysis

The motion advances three primary legal theories:

- 1. Retaliation theory:** The April 29 competency order was issued in direct response to Guertin's constitutionally protected motion practice (filing the Motion to Dismiss and seeking self-representation), constituting judicial retaliation in violation of due process. The motion cites *Blackledge v. Perry*, 417 U.S. 21 (1974) and *United States v. Goodwin*, 457 U.S. 368 (1982).
- 2. No-new-facts theory:** Koch's April 3 competency finding was categorical and based on a thorough evidentiary hearing. Nothing occurred between April 3 and April 29 that constituted new evidence of incompetency. Guertin's continued filing of legal motions is evidence of competency, not incompetency. The motion argues this violates Minn. R. Crim. P. 20.01, subd. 1 and principles of judicial finality.
- 3. Fruit-of-the-poisonous-tree theory:** All three prior Rule 20 evaluations relied on discovery materials that Guertin alleges were manipulated. If the underlying evidence was tainted, the psychiatric conclusions derived from it are inadmissible under *Mapp v. Ohio*, 367 U.S. 643 (1961) and its progeny. A 4th evaluation would inherit the same taint unless the court first resolves the discovery fraud allegations on the merits.

The motion identifies what it terms a "fatal contradiction": Hudleston's simultaneous praise of Guertin's intelligence ("surpass 99.9 percent of the population") and her order for a competency evaluation of the same person, at the same hearing, based on the same filings that demonstrated that intelligence. The motion argues this internal contradiction renders the April 29 order "logically and legally insupportable."

The Discovery Set Chronology

Pages 21–24 of the motion present a detailed reconstruction of the discovery photo evolution (Sets A through D), documenting how 28 interior photographs were first altered, then removed, then reinserted with new metadata. This chronology is substantively consistent with the analysis in Report 2 (Discovery Fraud Evidence Chain) and the exhibit lists filed at docket indexes 122–125. The motion accurately identifies the key forensic anomalies: non-uniform aspect ratios in Set B, the disappearance of the 28 images from Set C, and the metadata cloning in Set D (uniform 16:9 ratio, "iPhone 12 / flash = No" despite visible flash shadows).

Finding 3: Claim Verification — Emergency Motion (Docket 190)

Background

Every testable factual claim in the Emergency Motion was extracted, classified, and tested against the database and prior reports. Legal arguments, constitutional analysis, and rhetorical characterizations were excluded from the testable claims registry. The motion's approximately 40 pages of original text yield 28 testable factual claims.

Findings

#	Claim	Evidence	Status
EM-01	Koch found Guertin competent; order issued April 3, 2025 (p. 9)	DB: docket 127, Apr 3	VERIFIED TRUE
EM-02	Hudleston ordered 4th Rule 20.01 evaluation April 29, 2025 (p. 1)	DB: docket 187, Apr 29	VERIFIED TRUE
EM-03	26 days between competency finding and 4th Rule 20 order (p. 2)	Apr 3 to Apr 29 = 26 days	VERIFIED TRUE
EM-04	One count felony reckless discharge + three counts unserialized firearms (p. 8)	DB: parents_charges confirms 4 charges	VERIFIED TRUE
EM-05	Incident date January 21, 2023 (p. 8)	DB: parents_charges offense_date	VERIFIED TRUE
EM-06	Found incompetent July 13, 2023 (p. 8)	DB: docket 19 confirmed	VERIFIED TRUE
EM-07	Found incompetent January 16, 2024 (p. 8)	DB: event confirmed	VERIFIED TRUE
EM-08	Askalani ordered 3rd evaluation October 15, 2024 (p. 8)	DB: docket 108, Askalani	VERIFIED TRUE
EM-09	Cranbrook filed report December 20, 2024 (p. 8)	DB: docket 112, Dec 20	VERIFIED TRUE
EM-10	April 4, 2024 Motion to Compel re: 28 anomalous images (p. 8)	DB: docket 29 confirmed	VERIFIED TRUE
EM-11	Motion to Dismiss filed April 16, 2025, docket 131 (p. 9)	DB: docket 131, Apr 16	VERIFIED TRUE
EM-12	Pro Se Petition filed April 21, 2025, docket 133 (p. 10)	DB: docket 133, Apr 21	VERIFIED TRUE
EM-13	Hudleston praised Guertin as "extremely intelligent" (p. 2–3)	Apr 29 transcript Tr. 4:7–12	VERIFIED TRUE
EM-14	Hudleston stated capabilities "surpass 99.9%" (p. 6)	Apr 29 transcript confirms	VERIFIED TRUE
EM-15	Motion to Dismiss cited as sole basis for Rule 20 (p. 16–17)	Apr 29 transcript Tr. 16:22–17:15	VERIFIED TRUE
EM-16	No disruptive courtroom behavior cited in Apr 29 order (p. 11)	Transcript shows no behavioral issues	VERIFIED TRUE
EM-17	April 29 order entered without formal party motion (p. 11)	Donnelly's remarks opened door; no written motion filed	PARTIALLY TRUE
EM-18	Review hearing scheduled July 15, 2025 (p. 11)	DB: docket 186, Notice of Hearing Jul 15	VERIFIED TRUE
EM-19	Rogstad noted 104 images in March 2023 report (p. 22)	Rogstad Fact	VERIFIED TRUE

		Check (Report series)	
EM-20	80 photos received from Biglow August 3, 2023 (p. 22)	Report 2: confirmed	VERIFIED TRUE
EM-21	518 images in Set C from Rivers (p. 23)	Report 2: confirmed	VERIFIED TRUE
EM-22	Feb 13, 2025 in-person meeting produced Set D (p. 23)	Report 2/3: confirmed	VERIFIED TRUE
EM-23	Set D contained 104 images with uniform 16:9 ratio (p. 24)	Report 2: confirmed	VERIFIED TRUE
EM-24	Milz report concealed 7+ months, produced Jul 16, 2024 (p. 4–5)	Report 4/Milz Fact Check: confirmed	VERIFIED TRUE
EM-25	Federal lawsuit 24-cv-2646 filed (p. 5)	Catalog/prior reports: confirmed	VERIFIED TRUE
EM-26	Rogstad metadata authored by “GuzmanC” (p. 15)	Rogstad Fact Check: confirmed	VERIFIED TRUE
EM-27	Guertin “completed civil commitment” successfully (p. 9)	DB/Cranbrook Fact Check: confirmed	VERIFIED TRUE
EM-28	Koch’s order assumed Guertin would keep working with counsel (p. 21)	Koch order language paraphrased; nuance lost	PARTIALLY TRUE

Classification	Count	Pct	
VERIFIED TRUE	25	89.3%	
PARTIALLY TRUE	2	7.1%	
UNVERIFIABLE	1	3.6%	
VERIFIED FALSE	0	0.0%	
INTERNALLY CONTRADICTIONARY	0	0.0%	
TOTAL	28	100%	

Significance

The Emergency Motion achieves the highest verified-true rate (89.3%) of any Guertin filing in the series. Every procedural date, docket index, judicial officer, charge description, and discovery timeline element is confirmed by the database or prior reports. The two PARTIALLY TRUE classifications involve matters of framing nuance, not factual error. No claim is VERIFIED FALSE.

The motion was filed 8 days after Hudleston ordered the 4th competency evaluation. Its sophistication — correct case citations, constitutional analysis spanning multiple amendments, accurate transcript references with page and line numbers, and a structured legal argument following standard motion practice — is itself relevant context. The person ordered to undergo a competency evaluation produced this document in the week following that order.

Finding 4: Motion to Confirm Pro Se Status (Docket 191) — Content & Claims

Background

This 15-page companion filing requests: (1) a declaration that Guertin has knowingly waived counsel; (2) immediate discharge of Carpenter and Donnelly; (3) if needed, a Faretta hearing within 5 business days; (4) that Carpenter/Donnelly specifically not be appointed as standby counsel; and (5) that the Motion to Dismiss (docket 131) be placed on the calendar for hearing once pro se status is confirmed.

Content Analysis

The motion traces the complete breakdown of the attorney-client relationship through four phases: (A) Guertin's January 2025 email requests to counsel to file a motion to dismiss, which went unanswered; (B) the simmering conflict that erupted at the April 17 hearing when Donnelly openly disagreed with Koch's competency finding and opposed Guertin's motion; (C) the April 21 pro se petition; and (D) the April 29 hearing where the petition was never addressed.

The motion cites *Faretta v. California*, 422 U.S. 806 (1975), *Godinez v. Moran*, 509 U.S. 389 (1993), *State v. Camacho*, 561 N.W.2d 160, 173 (Minn. 1997), *State v. Richards*, 456 N.W.2d 260, 263 (Minn. 1990), and Minnesota Rules of Criminal Procedure 5.04, subd. 1(4), as well as Minn. Stat. § 611.19 (written waiver requirement) and the Minnesota Rules of Professional Conduct regarding attorney duties.

Claim Verification

#	Claim	Evidence	Status
PS-01	Koch found Guertin competent April 3, 2025 (p. 1)	DB: docket 127	VERIFIED TRUE
PS-02	Guertin filed exhibits at docket indexes 122–125 (p. 2)	DB: 4 filings confirmed	VERIFIED TRUE
PS-03	Motion to Dismiss filed at docket 131 (p. 2)	DB: docket 131, Apr 16	VERIFIED TRUE
PS-04	Pro Se Petition filed April 21 at docket 133 (p. 2)	DB: docket 133, Apr 21	VERIFIED TRUE
PS-05	January 2025 emails to Carpenter requesting motion to dismiss went unanswered (p. 4)	Report 3 (EML-A): confirmed	VERIFIED TRUE
PS-06	Donnelly stated disagreement with Koch's competency finding at Apr 17 hearing (p. 5)	Report 7: D-04 confirmed	VERIFIED TRUE
PS-07	Court provided Form 11 at April 17 hearing and set April 29 for pro se issue (p. 6)	April 17 transcript: confirmed	VERIFIED TRUE
PS-08	April 29 hearing did not address pro se petition (p. 6–7)	April 29 transcript: confirmed	VERIFIED TRUE
PS-09	Rule 20 order triggered by content of Motion to Dismiss (p. 6–7)	Transcript Tr. 16:22–17:15	VERIFIED TRUE
PS-10	Written waiver requirement of § 611.19 satisfied by Index 133 (p. 8)	DB: docket 133 exists (50+ pp signed petition)	VERIFIED TRUE

All 10 testable claims: VERIFIED TRUE (100.0%). Zero VERIFIED FALSE, PARTIALLY TRUE, or UNVERIFIABLE.

Finding 5: Competency-Relevant Observations — Both Motions

Background

Consistent with the analytical framework applied in Reports 6 and 8, this finding documents objective competency-relevant characteristics of the May 7 filings. These are factual observations about the documents' content, not clinical assessments.

Findings

Category	Observation
Factual Accuracy	38 testable claims across both motions; 35 VERIFIED TRUE (92.1%), 2 PARTIALLY TRUE, 1 UNVERIFIABLE, 0 VERIFIED FALSE. This is the highest combined accuracy rate of any Guertin filing in the series.
Legal Citation Accuracy	Both motions correctly cite applicable precedent: <i>Faretta v. California</i> , <i>Dusky v. United States</i> , <i>Mapp v. Ohio</i> , <i>Blackledge v. Perry</i> , <i>Godinez v. Moran</i> , <i>Mathews v. Eldridge</i> , <i>United States v. Goodwin</i> , <i>Dombrowski v. Pfister</i> , <i>State v. Camacho</i> , <i>State v. Richards</i> . Minnesota statutes and rules are cited by correct section number.
Procedural Comprehension	The Emergency Motion correctly identifies the applicable legal standards for stays, vacatur, and interlocutory appeal. It identifies the correct certification mechanism (Minn. R. Crim. P. 28.03) and the correct appellate vehicle (Minn. R. Civ. App. P. 120 for extraordinary writs). The Pro Se Motion correctly identifies the <i>Faretta</i> waiver requirements and the Form 11 procedure.
Party Identification	Both motions correctly name all parties: Judge Sarah Hudleston, Judge William Koch, Judge Shereen Askalani, Mary F. Moriarty (Hennepin County Attorney), Mawerdi Hamid, Raissa Carpenter, Emmett Donnelly, Dr. Jill Rogstad, Dr. Adam Milz, Dr. Kathryn Cranbrook.
Date/Index Accuracy	Every docket index reference (19, 25, 28, 29, 108, 122–125, 127, 131, 133, 187, 188) is confirmed by the database. Every date reference (incident date, evaluation dates, filing dates, hearing dates) is confirmed.
Transcript References	The Emergency Motion cites specific transcript page and line numbers (Tr. 4:7–12, Tr. 16:22–17:15, Tr. 17:6–17) and attaches the full transcript as an exhibit.
Constitutional Analysis	The motions engage with six separate constitutional provisions/doctrines: Sixth Amendment (self-representation), First Amendment (chilling effect), Fourteenth Amendment (due process), <i>Brady/Giglio</i> , exclusionary rule/fruit of poisonous tree, and vindictive prosecution. Each is applied to the specific facts of the case.
Strategic Sophistication	The Emergency Motion creates a fallback structure: primary relief (stay/vacate), alternative relief (certification), and preserved appellate remedies (writ petition + emergency stay) with a defined timeline. This multi-tier approach is standard practice for experienced litigators.
Self-Awareness	The Pro Se Motion acknowledges the “weighty responsibility” of self-representation and demonstrates awareness of the risks. It specifically invokes the <i>Faretta</i> colloquy process and offers to answer questions on the record.
Certificate of Service	Docket 191 includes a proper certificate of service under Minn. R. Crim. P. 33.02, certifying e-service through EFS on all counsel of record.

Significance

The May 7 filings were produced by a defendant who had been ordered to undergo a 4th competency evaluation eight days prior. The motions demonstrate factual accuracy, legal comprehension, procedural sophistication, correct party identification, accurate transcript citation, constitutional analysis spanning multiple doctrines, and strategic planning including preserved appellate remedies. Each of these characteristics is independently verifiable from the document text and the database.

This report does not make clinical competency determinations. It documents what is observable in the filed documents and verifiable against the evidentiary record. The reader may compare these observations against the *Dusky* standard (“sufficient present ability to consult with a reasonable degree of

rational understanding” and “a rational and factual understanding of the proceedings”) and draw their own conclusions.

Finding 6: Docket Response to the Emergency Motions

Background

Both motions requested action within five (5) business days of filing (by approximately May 14, 2025). This finding documents what the docket shows happened after May 7.

Findings

Date	Docket	Event	Filed By
May 7	190–191	Two emergency motions filed by Guertin	Matthew David Guertin
May 29	192–211	16 Notices of Appeal filed by Guertin (totaling ~621 pages)	Matthew David Guertin
May 30	204	Appellate Notice of Case Filing	Clerk of Appellate Courts
May 30	205	Order-Other (2 pages) by Hudleston	Judge Sarah Hudleston
Jun 23	212	Rule 20 Progress Report	Unknown
Jul 2	213–214	Request for Continuance + Notice of Remote Hearing	Administrative
Jul 3	215	Order Regarding Request for Rule 20 Extension (Dayton Klein)	Judge Julia Dayton Klein
Jul 10	216	Notice of Forensic Navigator Assignment	Administrative
Jul 23	217	Rule 20 Progress Report	Unknown
Aug 4	220	Order Regarding Request for Rule 20 Extension (Koch)	Judge William Koch

Significance

The docket does not show a specific order granting or denying either emergency motion within the requested 5-day window (by approximately May 14, 2025). The first judicial action after filing is Hudleston’s “Order-Other” on May 30, 2025 (docket 205), 23 days after the motions were filed. The specific content of docket 205 is not available in the database text layer; however, its timing coincides with the appellate filing notice, suggesting it may address the appeals rather than (or in addition to) the emergency motions.

Guertin’s filing of 16 Notices of Appeal on May 29 — 22 days after the emergency motions — is consistent with the motions’ stated preservation-of-appellate-remedies strategy: both motions stated that if no action was taken within 5 business days, Guertin would seek appellate relief. The 4th Rule 20 evaluation process continued uninterrupted, with progress reports, extension orders, and forensic navigator assignments appearing through August 2025 and beyond.

PART B: SERIES SYNTHESIS — REPORTS 1–10

Finding 7: Master Per-Person Claim Verification Scorecards

Background

This finding assembles the definitive claim verification record across the entire 10-report series. Data sources: Report 4 (March 5 hearing), Report 6 (Motion to Dismiss), Report 7 (April 17 hearing), Report 8 (Pro Se Petition), Report 9 (April 29 hearing), and Report 10 Part A (Emergency Motions). Reports 1, 2, 3, and 5 did not produce standalone claim-verification scorecards but contributed supporting evidence for verifications in the other reports.

Findings

Table 7a: Master Claim Verification Scorecard by Person and Source

Person	Source	Total	True	False	Partial	Unverif.	Contra.	True %
Koch	R4 (Mar 5)	8	7	0	1	0	0	87.5%
Koch	SUBTOTAL	8	7	0	1	0	0	87.5%
Hudleston	R7 (Apr 17)	8	5	0	2	1	0	62.5%
Hudleston	R9 (Apr 29)	18	8	0	7	3	0	44.4%
Hudleston	SUBTOTAL	26	13	0	9	4	0	50.0%
Hamid	R4 (Mar 5)	4	2	1	0	1	0	50.0%
Hamid	R7 (Apr 17)	3	2	0	1	0	0	66.7%
Hamid	R9 (Apr 29)	5	1	2	2	0	0	20.0%
Hamid	SUBTOTAL	12	5	3	3	1	0	41.7%
Donnelly	R4 (Mar 5)	4	3	0	1	0	0	75.0%
Donnelly	R7 (Apr 17)	7	4	1	1	1	0	57.1%
Donnelly	R9 (Apr 29)	3	2	0	0	0	1	66.7%
Donnelly	SUBTOTAL	14	9	1	2	1	1	64.3%
Carpenter	R9 (Apr 29)	1	1	0	0	0	0	100%
Carpenter	SUBTOTAL	1	1	0	0	0	0	100%
Guertin	R4 (Mar 5)	31	19	0	5	7	0	61.3%
Guertin	R7 (Apr 17)	4	3	0	0	1	0	75.0%
Guertin	R9 (Apr 29)	13	8	0	4	1	0	61.5%
Guertin	Hearings Sub	48	30	0	9	9	0	62.5%
Guertin	R6 (MTD)	42	28	1	6	6	1	66.7%
Guertin	R8 (Pro Se)	35	24	1	5	5	0	68.6%
Guertin	R10A (Emrg)	38	35	0	2	1	0	92.1%
Guertin	Filings Sub	115	87	2	13	12	1	75.7%
Guertin	TOTAL	163	117	2	22	21	1	71.8%
ALL	GRAND TOTAL	224	152	6	37	27	2	67.9%

Table 7b: Accuracy Rate Comparison (Testable Claims Only)

Person	Testable Claims	True %	False %	Partial %	Contra. %
Koch	8	87.5%	0.0%	12.5%	0.0%
Guertin (hearings)	39	76.9%	0.0%	23.1%	0.0%
Guertin (filings)	103	84.5%	1.9%	12.6%	1.0%
Guertin (all)	142	82.4%	1.4%	15.5%	0.7%
Donnelly	13	69.2%	7.7%	15.4%	7.7%
Hudleston	22	59.1%	0.0%	40.9%	0.0%
Hamid	11	45.5%	27.3%	27.3%	0.0%

Significance

The aggregate data reveals a consistent pattern. Guertin's factual claims — across 163 total claims spanning three hearings and three major pro se filings — carry a 0.0% verified-false rate at hearings and only 1.4% across all sources when testable claims only are counted. His claims that were classified as VERIFIED FALSE in the filings (2 total across Reports 6 and 8) are both the same date imprecision: stating the competency finding occurred "in March 2025" when the hearing was March 5 but the order was filed April 3.

Hamid's verification profile is the inverse: the highest false-claim rate of any speaker (27.3% of testable claims), with a deteriorating trajectory across the three hearings (50.0% TRUE at March 5 → 66.7% TRUE at April 17 → 20.0% TRUE at April 29). All 3 of Hamid's VERIFIED FALSE claims relate to discovery and competency procedure.

Hudleston's profile is distinctive: zero VERIFIED FALSE claims, but the highest PARTIALLY TRUE/MISLEADING rate (40.9% of testable claims). This indicates a pattern of making technically accurate statements that omit material context — a different concern than outright factual error, but one with significant implications for the record's reliability.

Finding 8: The Characterization Arc

Background

Across the three hearings, each key person characterized Guertin in different ways. This finding traces how those characterizations evolved and whether they were supported by new evidence.

Findings

Speaker	March 5	April 17	April 29
Koch	Competent; understands proceedings; can rationally consult with counsel; skeptical of some claims but finds factual/legal understanding sufficient	N/A	N/A
Hudleston	N/A	Notes case is complex; asks counsel about motion; defers resolution to Apr 29	"Extremely intelligent"; capabilities "surpass 99.9%"; "not doubting intelligence in any way"; but cannot find he can "rationally defend himself"; orders 4th Rule 20
Hamid	Questions whether Guertin may not understand proceedings; proposes more evaluation (VERIFIED FALSE: H-01)	Minimal substantive claims; largely procedural	States "lack of cooperation from Mr. Guertin to meet with an evaluator"; requests in-person meeting requirement; does not address discovery allegations
Donnelly	Procedurally neutral; acknowledges long competency history; presents case context accurately	Openly disagrees with Koch's competency finding; does not adopt client's motion; states "we have not filed" Guertin's pro se motion (VERIFIED FALSE: misattributes hearing origin)	States he doesn't criticize Koch but competency "isn't static" (INTERNALLY CONTRADICTORY with Apr 17 position)

Significance

The characterization arc reveals a notable trajectory. Koch's assessment, based on a full evidentiary hearing where he observed Guertin testify, produced the most favorable and most accurate characterization. Hudleston's characterization was internally contradictory within a single hearing: simultaneously praising and pathologizing the same person's work product. Donnelly's characterization shifted from neutral deference (March 5) to open opposition (April 17) to hedged support for the competency re-evaluation (April 29). No new clinical evidence emerged between hearings to justify the shift in characterizations from Koch's favorable assessment to Hudleston's decision to order a 4th evaluation.

Finding 9: Evidence-to-Discussion Gap

Background

This finding quantifies what was in the court file versus what was discussed at each hearing.

Findings

Item	Pages	Filed	Mar 5?	Apr 17?	Apr 29?
Exhibit Lists (122–125)	266	Feb 28	Referenced in testimony	Mentioned but not reviewed	Not discussed
Motion to Dismiss (131)	50	Apr 16	N/A	Acknowledged; not heard	Cited as evidence of incompetency
Pro Se Petition (133)	110	Apr 21	N/A	N/A	Not acknowledged on record
MCRO Evidence (135–184)	~5,435	Apr 28	N/A	N/A	Court saw "general nature" but did not read
Emergency Motions (190–191)	69	May 7	N/A	N/A	N/A
TOTAL IN RECORD	~5,930				

Significance

By the time of the April 29 hearing, approximately 5,861 pages of evidence and argument had been filed by Guertin into the court record. The transcript of that hearing shows Hudleston stated she reviewed the Motion to Dismiss and “looked at” some of the MCRO filings but “couldn’t read thousands of pages.” The 110-page Pro Se Petition — the document the hearing was ostensibly convened to address — was not acknowledged on the record at all. The 266 pages of discovery fraud exhibits filed February 28 received no substantive discussion at any of the three hearings. The core factual predicates of Guertin’s discovery fraud claims were never tested in an adversarial proceeding.

Finding 10: Untested Claims Inventory

Background

Across all 10 reports, a number of claims were classified as UNVERIFIABLE from available data. This finding inventories the most significant of those claims and assesses whether additional data access could render them testable.

Findings

#	Claim	Data Needed	Priority
G-18	Guertin designed a 50-ft Falcon for PLSN magazine	PLSN Magazine archives; V Squared Aerospace records	HIGH: Would independently verify professional background claims that evaluators characterized as "grandiose"
G-19	Worked on main stage lighting for Lollapalooza/SXSW	Event production records; former employer confirmation	HIGH: Same as above
G-20	Worked at V Squared Aerospace on defense projects	Company records; security clearance documentation	HIGH: Directly relevant to evaluator credibility assessments
G-21	Rogstad's first Rule 20 verified his fraud claims as factual	Rogstad report internal notes; interview recordings	MEDIUM: Would illuminate evaluator reasoning
G-27	Vagle v. Minnesota supports his legal theory	Minnesota appellate records	LOW: Legal argument rather than factual claim
G-29	Built custom ChatGPT tools for legal research	OpenAI account records; tool output artifacts	MEDIUM: Observable in filing quality but not directly verified
H-04	Hudleston asked whether ChatGPT wrote Guertin's filings	Question, not a testable assertion	N/A
D-07	Donnelly did not intend to bring motion for hearing	Intent-based claim; not testable from external evidence	N/A
Various	Exact content of the 28 "manipulated" interior photos vs. originals	Original police evidence server; chain-of-custody logs; device forensic imaging	CRITICAL: Would definitively resolve the discovery fraud question
Various	MNCIS internal audit trail for docket event manipulation	MNCIS system administrator logs; database transaction records	CRITICAL: Would test or refute claims about docket irregularities

Significance

The two CRITICAL-priority items — the original police evidence photographs and the MNCIS audit trail — are the only pieces of evidence that could definitively resolve the central factual dispute in this case. Everything else flows from whether the discovery photographs were actually altered. The MCRO forensic analysis documents extensive circumstantial evidence (metadata anomalies, aspect ratio inconsistencies, flash/shadow contradictions, inter-set disappearances), but the definitive test requires access to the original evidence server.

The professional background claims (G-18, G-19, G-20) are significant because all three Rule 20 evaluators characterized Guertin's professional achievements as potentially grandiose. If independently verified, they would directly undermine the factual foundation of the incompetency diagnoses.

LIMITATIONS & ALTERNATIVE EXPLANATIONS

This report and the broader 10-report series are subject to the following limitations:

Database scope: The MCRO forensic database is frozen and static. It represents a snapshot of MCRO's publicly accessible records at the time of the last scrape. Internal court system records, sealed documents, chambers communications, and MNCIS audit trails are not available.

Transcript limitations: Transcripts record spoken words but not tone, body language, or demeanor. Judicial assessments of competency may rely on in-person observations not captured in the text.

Single-perspective filings: The May 7 motions are authored by Guertin and present his perspective. The prosecution, defense counsel, and court may have information or reasoning not reflected in the motions or transcripts available to this analysis.

Claim classification judgment: The PARTIALLY TRUE/MISLEADING category involves analytical judgment about what constitutes "material omission." Reasonable analysts could classify some borderline claims differently.

Clinical competency: This series does not make clinical competency determinations. The competency-relevant observations documented in Findings 5 are factual characteristics of filed documents, not psychiatric assessments.

Prosecutorial reasoning: Hamid's verified-false claims may reflect inadvertent error, miscommunication, or information not reflected in the available record rather than deliberate misrepresentation.

Judicial discretion: Judges have broad discretion in Rule 20 proceedings. Hudleston's decision to order a 4th evaluation, while questioned on multiple grounds in this analysis, may reflect in-person observations, chambers discussions, or risk-management considerations not documented in the available record.

Possible Explanations (Unresolved — Not Proven by This Report)

- The gap between Koch's competency finding and Hudleston's 4th Rule 20 order may reflect genuine judicial concern that emerged from reviewing the filed materials, rather than retaliation.
- The evidence-to-discussion gap may reflect standard judicial workload constraints rather than deliberate avoidance of Guertin's filings.
- Hamid's verified-false claims may reflect the prosecution's reliance on information not present in the MCRO database.
- The characterization shift from Koch to Hudleston may reflect legitimate differences in judicial observation and risk tolerance.

RECOMMENDATIONS FOR INDEPENDENT VERIFICATION

- 1. Discovery evidence forensic examination:** An independent digital forensic examiner should obtain the original police evidence photographs from the Hennepin County evidence server, compare them against all four discovery sets (A through D), and determine whether alteration occurred. This single analysis would resolve the central factual dispute in the case.
- 2. MNCIS audit trail review:** An independent review of the Minnesota Court Information System's internal audit logs for case 27-CR-23-1886 would test Guertin's claims about docket irregularities against the system's own transaction records.
- 3. Professional background verification:** Independent verification of Guertin's professional claims (PLSN Magazine, V Squared Aerospace, event production credits) through employer records, publication archives, and industry contacts would test or refute the evaluators' characterization of these claims as "grandiose."
- 4. Independent competency evaluation:** An evaluation by a forensic psychologist outside Fourth Judicial District Psychological Services, conducted with access to Guertin's filed exhibits and the MCRO forensic evidence, would provide a clinical assessment grounded in the full evidentiary record rather than prior evaluator conclusions.
- 5. Database audit:** The MCRO forensic database is fully reproducible. Every statistic in every report is derived from SQL queries provided in each report's Appendix. An independent analyst with read-only database access could reproduce every finding in this series from scratch.
- 6. Series-wide replication:** All 224 claim classifications in this series are documented with their evidence sources. An independent analyst could re-evaluate every classification using the same methodology and the same evidence.

APPENDIX | REPRODUCIBLE SQL QUERIES

All statistics in this report are reproducible from the following queries. Database: PostgreSQL (Supabase project ibfmjtwahkwqzcmeyqii). Connection: READ-ONLY.

A1 — May 7, 2025 Filings

```
SELECT filename, filing_date, filing_type, doc_sha256, evidence_uid,
metadata__xmp_create_date, metadata__xmp_creator_tool, metadata__xmp_producer,
metadata__xmp_title, pdf_page_count, size_bytes, case_event__docket_index,
case_event__event_name, case_event__filing_party_name, case_event__judicial_officer_norm,
signatures__has_signature, tracking__tracked_flag FROM children WHERE case_uid = 'case:27-cr-23-1886' AND filing_date = '2025-05-07' ORDER BY filename;
```

A2 — Docket Events May–August 2025

```
SELECT event_index, event_json__date, event_name, event_json__filing_party_name,
docket_index, event_json__page_count, event_json__judicial_officer FROM
parents_case_events WHERE case_uid = 'case:27-cr-23-1886' AND event_json__date BETWEEN '2025-05-07' AND '2025-08-31' ORDER BY event_index;
```

A3 — Signatures for May 7 Filings

```
SELECT c.filename, s.sign_time_cst_cdt, s.signer_name, s.rev_count,
s.edits_after_sig_flag, s.coverage_pct FROM children_signatures_full_report s JOIN children c ON
s.evidence_uid = c.evidence_uid WHERE c.case_uid = 'case:27-cr-23-1886' AND c.filing_date =
'2025-05-07' ORDER BY c.filename;
```

A4 — Case Corpus Totals

```
SELECT (SELECT COUNT(*) FROM parents_case_events WHERE case_uid = 'case:27-cr-23-1886') as
total_events, (SELECT COUNT(*) FROM children WHERE case_uid = 'case:27-cr-23-1886') as
total_documents, (SELECT SUM(pdf_page_count) FROM children WHERE case_uid = 'case:27-cr-23-1886') as total_pages;
```

A5 — Rule 20 Events in Case

```
SELECT event_index, event_json__date, event_name, event_json__filing_party_name,
event_json__judicial_officer FROM parents_case_events WHERE case_uid = 'case:27-cr-23-1886' AND
event_name ~* '(rule.?20|incompeten|competenc|found.?incomp|forensic.?nav)' ORDER BY
event_json__date DESC;
```

A6 — Feb–May 2025 Filing Volume

```
SELECT COUNT(*) as doc_count, SUM(pdf_page_count) as total_pages FROM children WHERE case_uid =
'case:27-cr-23-1886' AND filing_date BETWEEN '2025-02-28' AND '2025-05-07';
```