

**UNITED STATES COURT OF APPEALS
FOR THE EIGHTH CIRCUIT**

MATTHEW D. GUERTIN

Case No: 25-2476

Appellant,

v.

TIM WALZ,

Governor of Minnesota;

KEITH ELLISON,

Minnesota Attorney General;

HENNEPIN COUNTY,

a municipal entity;

MARY MORIARTY,

Hennepin County Attorney;

JUDITH COLE,

Sr. Assistant Hennepin County Attorney;

MICHAEL BERGER,

Chief Public Defender, Hennepin County;

KERRY W. MEYER,

Chief Judge, 4th District;

BRUCE M. RIVERS,

Private Defense Counsel;

CHELA GUZMAN-WIEGERT,

Assistant County Administrator;

ALISHA NEHRING,

MN Department of Health Attorney;

HILARY CALIGIURI,

Presiding Criminal Judge, 4th District;

TODD FELLMAN,

Presiding Juvenile Judge, 4th District;

SARAH HUDLESTON,

Judge, 4th District;

WILLIAM H. KOCH,

Judge, 4th District;

JULIA DAYTON-KLEIN,

Judge, 4th District;

DANIELLE C. MERCURIO,

Judge, 4th District;

GEORGE F. BORER,

Referee, 4th District;

**MOTION FOR JUDICIAL
NOTICE OF ESOLUTIONS
DIGITAL SIGNATURE
FRAUD FACTS**

LEE CUELLAR,
Judicial Clerk, 4th District;
MAWERDI HAMID,
Assistant Hennepin County Attorney;
JACQUELINE PEREZ,
Assistant Hennepin County Attorney;
EMMETT M. DONNELLY,
Hennepin County Public Defender;
RAISSA CARPENTER,
Hennepin County Public Defender;
SHEREEN ASKALANI,
Judge, 4th District;
DR. JILL ROGSTAD,
Senior Clinical Forensic Psychologist;
DR. ADAM MILZ,
Hennepin County Psychological Services;
DR. KATHERYN CRANBROOK,
Hennepin County Psychological Services;
DR. KRISTEN A. OTTE,
Hennepin County Psychological Services;
MICHAEL K. BROWNE,
Judge, 4th District;
LISA K. JANZEN,
Judge, 4th District;
CAROLINA A. LAMAS,
Judge, 4th District;
JOHN DOES 1–50;
JANE DOES 1–50,
Appellees.

I. INTRODUCTION

Appellant respectfully moves this Court to take judicial notice under Fed. R. Evid. 201(b)(2) of indisputable, verifiable facts pertaining to his MCRO Evidentiary Dataset, and the thousands of Ai generated judicial orders filed in Minnesota Fourth Judicial District Court, including his Case No. 27-CR-23-1886.

II. ESOLUTIONS DIGITAL SIGNATURE, AND FRAUD FACTS ACROSS THE ENTIRE MCRO EVIDENTIARY DATASET

A. | 2 x Finding of Incompetency and Order

Out of 129 of these filing types contained in MCRO Evidentiary Dataset contain an “ESolutions” signature.

1. 1.6% of these judicial case filing types (2) are signed by the fraudulent “ESolutions” digital signature.

(See [Exhibit OMG-6](#), Doc. 17, Index 873, and 884)

2. 0.8% of these judicial case filing types (1) is a July 13, 2023 order submitted into the docket of case “27-CR-23-1886” which is the case of “Matthew David Guertin” - the Appellant.

3. 98.4% of these judicial case filing types (127) are presented by Appellant in “[Exhibit MCR-1](#)” (Doc. 15.5) of the appealed case docket, as being identical clones of each other except for minor text variations needed to make it appear unique to each purported defendant.

4. The first page of “[Exhibit MCR-1](#)” contains the Appellant’s own January 17, 2024 “Finding of Incompetency” order, and is presented in a side by side visual format which irrefutably establishes that his order is one of these 127 “clones.”

5. “[Exhibit MCR-1](#)” was part of Appellant’s July 10, 2025 “Notice of Supplemental Evidentiary Filing” where he describes this exhibit as:

“A side-by-side visual presentation comparing Plaintiff’s own January 17, 2024 incompetency order with its cloned counterparts discovered across synthetic dockets.”

(See [Notice of Supplemental Evidentiary Filing](#), Doc. 15.0, p. 4 of 5)

6. In the third and final section, titled “PURPOSE OF THIS EVIDENTIARY FILING” Appellant lists the following verbatim:

a. “To ensure early judicial notice of systemic misconduct that undermines the presumption of comity, abstention, or Younger deference,”

b. “To protect and preserve material evidence before any party attempts obfuscation, delay, or mischaracterization of facts,” and

c. “To publicly assert that Plaintiff is no longer a defendant in a state “proceeding” — he is a targeted whistleblower attempting to escape one which has never been real to begin with.”

(See [*Notice of Supplemental Evidentiary Filing*](#), Doc. 15.0, pp. 4-5)

7. Judge Paul Magnuson issued a sua sponte dismissal of Appellant’s civil rights and RICO complaint at Doc. 14 of the Appealed docket on July 10, 2025—less than two hours before Appellant filed the notice containing his first five evidentiary exhibits into the case.

(See [*Dismissal Order*](#), Doc. 14)

8. “[Exhibit OMG-2](#)” (Doc. 15.2) is a CSV to PDF based evidentiary exhibit which factually establishes that 96.9% (125) of the 129 total “Finding of Incompetency” orders contain one or more additional orders containing the digital signature of a judicial officer of the Fourth Judicial District Court that was signed at the exact same time (day, time, hour, minute, and second), as well as these digital signatures signing the exact same byte-ranges across these orders.

9. The largest group of incompetency orders in “[Exhibit OMG-2](#)” proven to be forgeries, contains a total of 12 orders which are all purportedly signed

on May 2, 2023 at 15:12:11 by named defendant, and judge “Danielle C. Mercurio.” (See [Exhibit OMG-2](#), Index 144-155, p. 5)

10. “[Exhibit OMG-3](#)” (Doc. 15.3) of Appellant’s July 10 filing proves that all 12 of these digital clones, as well as 89 others (at least) all list the document’s “Author,” and “Creator” as being “barbj” instead of actually containing the name of the judicial officer whose digital signature is indicated as having authorized the orders. The only variation among these 103 incompetency orders are the two detailed at [Index 81, and 85](#)—the only two orders of this type which also contain the “ESolutions” digital signature—with Appellant’s July 13, 2023 order being one of these, and which is at Index 81.

11. Notably, Appellant’s July 13 order is the only one featured in this exhibit whose “author,” and “creator” metadata actually lists a known judicial officer of the court—Danielle C. Mercurio—despite the fact that she is not the one who digitally signed the document.

B. | 1 x Order for Continuance

Out of 1 of these filing types contained in MCRO Evidentiary Dataset contain an “ESolutions” signature.

1. 100% of these judicial case filing types (1) are signed by the fraudulent “ESolutions” digital signature.

(See [Exhibit OMG-6](#), Doc. 17, Index 2827)

2. This “Order for Continuance” filing type is the only one contained among the 3,601 case files which makes up Appellant’s “MCRO Evidentiary Dataset,” with this order being the one that was submitted into Appellant’s own Minnesota Fourth Judicial District Court case number 27-CR-23-1886 on June 14, 2023 by named defendant, and Judge Julia Dayton Klein.

C. | 11 x Order-Evaluation for Competency to Proceed (Rule 20.01)

Out of 488 of these filing types contained in MCRO Evidentiary Dataset contain an “ESolutions” signature.

1. 2.3% of these judicial case filing types (11) are signed by the fraudulent “ESolutions” digital signature, which is applied to a form field named “tyler_sig_XXXXXXXX-XXXX-XXXX-XXXX-XXXXXXXXXXXX” once per each page of each of these PDF documents.

(See [Exhibit OMG-6](#), Doc. 17, Index 3067, 3103, 3120, 3140, 3167, 3193, 3418, 3445, 3520, 3572, and 3634)

2. 67.4% of these filing types (329) do not contain any additional digital signatures besides the ‘Minnesota Court Records Online’ (MCRO) signature that was applied when each of the files were downloaded.

D. | 7 x Order to Transport

Out of 33 of these filing types contained in MCRO Evidentiary Dataset contain an “ESolutions” signature.

1. 21.2% of these judicial case filing types (7) are signed by the fraudulent “ESolutions” digital signature, which is applied to a form field named “tyler_sig_XXXXXXXX-XXXX-XXXX-XXXX-XXXXXXXXXXXX” once per each page of each of these PDF documents.

(See [Exhibit OMG-6](#), Doc. 17, Index 3005, 3009, 3013, 3017, 3023, 3026, and 3029)

2. The remaining 78.8% of these filing types (26) contains only the ‘Minnesota Court Records Online’ (MCRO) signature that was applied when this file was downloaded.

3. The remaining 30.3% of these filing types (148) contains only the MCRO download signature, along with one, or more “signature” form fields digitally signed by a judicial officer of the court.

E. | 29 x Order Revoking Interim Conditions of Release

Out of 32 of these filing types contained in MCRO Evidentiary Dataset contain an “ESolutions” signature.

1. 90.6% of these judicial case filing types (29) are signed by the fraudulent “ESolutions” digital signature, which is applied to a form field named “tyler_sig_XXXXXXXX-XXXX-XXXX-XXXX-XXXXXXXXXXXX” once per each page of each of these PDF documents.

(See [Exhibit OMG-6](#), Doc. 17, Index 2882, 2885, 2889, 2892, 2896, 2899, 2902, 2905, 2908, 2911, 2914, 2917, 2920, 2923, 2926, 2929, 2932, 2935, 2938, 2942, 2945, 2951, 2954, 2957, 2960, 2963, 2966, 2969, and 2972)

2. The other 9.4% of these filing types (3) do not contain any additional digital signatures besides the ‘Minnesota Court Records Online’ (MCRO) signature that was applied when each of the files were downloaded.

F. | 23 x Order-Other

Out of 71 of these filing types contained in MCRO Evidentiary Dataset contain an “ESolutions” signature.

1. 32.4% of these judicial case filing types (23) are signed by the fraudulent “ESolutions” digital signature, which is applied to a form field named “tyler_sig_XXXXXXXX-XXXX-XXXX-XXXX-XXXXXXXXXXXX” once per each page of each of these PDF documents.

(See [Exhibit OMG-6](#), Doc. 17, Index 3720, 3727, 3732, 3740, 3743, 3747, 3751, 3755, 3758, 3768, 3771, 3780, 3793, 3801, 3807, 3810, 3814, 3820, 3824, 3828, 3831, 3834, and 3839)

2. 60.6% of these filing types (43) do not contain any additional digital signatures besides the ‘Minnesota Court Records Online’ (MCRO) signature that was applied when each of the files were downloaded.

3. The remaining 7% of these filing types (5) contains only the MCRO download signature, along with a “signature” form field digitally signed by a judicial officer of the court.

G. | 10 x Amended Order

Out of 31 of these filing types contained in MCRO Evidentiary Dataset contain an “ESolutions” signature.

1. 32.2% of these judicial case filing types (10) are signed by the fraudulent “ESolutions” digital signature, which is applied to a form field named “tyler_sig_xxxxxxxx-xxxx-xxxx-xxxx-xxxxxxxxxxxxx” once per each page of each of these PDF documents.

(See [*Exhibit OMG-6*](#), Doc. 17, Index 42, 45, 49, 52, 55, 58, 65, 70, 73, and 79)

2. The remaining 67.8% of these filing types (21) do not contain any additional digital signatures besides the ‘Minnesota Court Records Online’ (MCRO) signature that was applied when each of the files were downloaded.

H. | 8 x Order Denying Motion

Out of 9 of these filing types contained in MCRO Evidentiary Dataset contain an “ESolutions” signature.

1. 88.9% of these judicial case filing types (10) are signed by the fraudulent “ESolutions” digital signature, which is applied to a form field named “tyler_sig_xxxxxxxx-xxxx-xxxx-xxxx-xxxxxxxxxxxxx” once per each page of each of these PDF documents.

(See [Exhibit OMG-6](#), Doc. 17, Index 2509, 2513, 2516, 2521, 2525, 2528, 2531, and 2535)

2. The remaining 11.1% of these filing types (1) contains only the 'Minnesota Court Records Online' (MCRO) signature that was applied when this file was downloaded.

I. | 7 x Probation Violation Order for Detention

Out of 7 of these filing types contained in MCRO Evidentiary Dataset contain an "ESolutions" signature.

1. 100% of these judicial case filing types (7) are signed by the fraudulent "ESolutions" digital signature, which is applied to a form field named "tyler_sig_XXXXXXXX-XXXX-XXXX-XXXX-XXXXXXXXXXXX" once per each page of each of these PDF documents.

(See [Exhibit OMG-6](#), Doc. 17, Index 3974, 3977, 3980, 3984, 3987, 3990, and 3993)

J. | 3 x Probation Violation Warrant

Out of 4 of these filing types contained in MCRO Evidentiary Dataset contain an "ESolutions" signature.

1. 75% of these judicial case filing types (3) are signed by the fraudulent "ESolutions" digital signature.

(See [Exhibit OMG-6](#), Doc. 17, Index 3997, 4000, and 4004)

K. | 3 x Order Denying Removal of Judicial Officer

Out of 3 of these filing types contained in MCRO Evidentiary Dataset contain an "ESolutions" signature.

1. 100% of these judicial case filing types (3) are signed by the fraudulent "ESolutions" digital signature.

(See [Exhibit OMG-6](#), Doc. 17, Index 2538, 2541, and 2544)

L. | 3 x Order to Appear

Out of 3 of these filing types contained in MCRO Evidentiary Dataset contain an “ESolutions” signature.

1. 100% of these judicial case filing types (3) are signed by the fraudulent “ESolutions” digital signature.

(See [*Exhibit OMG-6*](#), Doc. 17, Index 2975, 2978, and 2981)

M. | 4 x Order for Conditional Release

Out of 221 of these filing types contained in MCRO Evidentiary Dataset contain an “ESolutions” signature.

1. 1.8% of these judicial case filing types (4) are signed by the fraudulent “ESolutions” digital signature.

(See [*Exhibit OMG-6*](#), Doc. 17, Index 2554, 2618, 2640, and 2645)

III. LEGAL STANDARD

The Court may take notice of facts “not subject to reasonable dispute” because they can be accurately and readily determined from sources whose accuracy cannot reasonably be questioned. Fed. R. Evid. 201(b), (d).

Judicial notice is proper on appeal to clarify the record without altering it. See Fed. R. App. P. 10(a)–(e), 27.

IV. REQUEST FOR JUDICIAL NOTICE

A. | Specific Facts for Notice

1. That the MCRO Evidentiary Dataset reflects the recurring appearance of an “ESolutions” digital signature across multiple filing types, with the counts/percentages shown in Section II (e.g., 2/129 “Finding of Incompetency and Order”; 1/1 “Order for Continuance”; 11/488 “Rule 20.01

Evaluation Orders”; 7/33 “Orders to Transport”; 29/32 “Orders Revoking Interim Conditions of Release”; 23/71 “Order—Other”; 10/31 “Amended Orders”; 8/9 “Orders Denying Motion”; 7/7 “Probation Violation Order for Detention”; 3/4 “Probation Violation Warrant”; 3/3 “Order Denying Removal of Judicial Officer”; 3/3 “Order to Appear”; and 4/221 “Order for Conditional Release”).

2. That for “Finding of Incompetency and Order,” 127 of 129 orders are shown as cloned exemplars with only minor textual variations, and Appellant’s own January 17, 2024 order is one of these clones; one July 13, 2023 order in Appellant’s case bears the “ESolutions” signature.

3. That where present, the “ESolutions” signature is applied via a per-page form field labeled “tyler_sig_XXXXXXXX-XXXX-XXXX-XXXX-XXXXXXXXXXXX.”

B. | Record Clarification

Appellant seeks notice of these objective, dataset-level attributes and counts to accurately characterize the record on appeal, without alteration of any document text.

V. RELIEF REQUESTED

1. Grant judicial notice of the facts identified in Section IV.A.
2. Recognize these noticed facts for purposes of accurately describing the record under Fed. R. App. P. 10(e).
3. Award such further relief as may be appropriate.

Dated: October 4, 2025

Respectfully submitted,

/s/ Matthew D. Guertin

Matthew David Guertin

Appellant Pro Se

4385 Trenton Ln. N 202

Plymouth, MN 55442

Telephone: 763-221-4540

MattGuertin@protonmail.com

www.MattGuertin.com

VI. CERTIFICATE OF COMPLIANCE PURSUANT TO FRAP 32(g)

I certify that this MOTION FOR JUDICIAL NOTICE OF ESOLUTIONS DIGITAL SIGNATURE FRAUD FACTS contains 2,135 words, excluding the parts of the motion exempted by Fed. R. App. P. 32(f). This document complies with the typeface requirements of Fed. R. App. P. 32(a)(5) and the typestyle requirements of Fed. R. App. P. 32(a)(6) because it has been prepared in a proportionally spaced typeface using LibreOffice Writer in 14-point Liberation Serif font.

Dated: October 4, 2025

Respectfully submitted,

/s/ Matthew D. Guertin

Matthew David Guertin
Appellant Pro Se
4385 Trenton Ln. N 202
Plymouth, MN 55442
Telephone: 763-221-4540
MattGuertin@protonmail.com
www.MattGuertin.com

VII. CERTIFICATE OF SERVICE

I hereby certify that on October 4, 2025, I electronically filed the foregoing document with the Clerk of the Court for the United States Court of Appeals for the Eighth Circuit by using the CM/ECF system.

All case participants who are registered CM/ECF users, and notwithstanding the disruptive ‘St. Paul Cyberattack’ that coincided with docketing of this appeal, shall be served by this Court’s electronic filing system, including:

Benjamin W. Harringa
Assistant Attorney General
Suite 600
445 Minnesota Street
Saint Paul, MN 55101-2134
benjamin.harringa@ag.state.mn.us, sophie.hayek@ag.state.mn.us

Margaret E. Jacot
Assistant Attorney General
Suite 1100
445 Minnesota Street
Saint Paul, MN 55101
margaret.jacot@ag.state.mn.us

Legal counsel for Appellees Walz, Ellison, and the 21 other named Defendants.

Dated: October 4, 2025

Respectfully submitted,

/s/ Matthew D. Guertin

Matthew David Guertin
Appellant Pro Se
4385 Trenton Ln. N 202
Plymouth, MN 55442
Telephone: 763-221-4540
MattGuertin@protonmail.com
www.MattGuertin.com