

## **II. BACKGROUND AND NATURE OF THE CASES**

I personally retained Bruce Rivers as my criminal defense attorney in early February of 2023. His official ‘certificate of representation’ was submitted into my criminal case file on February 20, 2023.

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### **A. Case Details**

- My ‘dormant’ criminal case in the Hennepin County 4th Judicial District Court:
  - 27-CR-23-1886

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- My civil commitment case in the Hennepin County 4th Judicial District Court:
  - 27-MH-PR-23-815

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- My pro se ‘Petition for Discretionary Review’ case in the Minnesota Court of Appeals:
  - A24-0780

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- My pro se Federal Civil Rights Case in the MN District Court:
  - ‘Guertin v. Hennepin County, 24-cv-02646-JRT-DLM’  
[CourtListener.com/docket/68925331/guertin-v-hennepin-county/](https://CourtListener.com/docket/68925331/guertin-v-hennepin-county/)

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- My pro se interlocutory appeal to the 8th Circuit Court of Appeals:
  - ‘Matthew Guertin v. Hennepin County, 24-2662’  
[CourtListener.com/docket/69060054/matthew-guertin-v-hennepin-county/](https://CourtListener.com/docket/69060054/matthew-guertin-v-hennepin-county/)

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### **B. My Current Status Within the Hennepin County 4th Judicial District Court**

- I am currently under a ‘stayed order of civil commitment’ based upon my supposed ‘incompetency to stand trial’ – which is something I have been contesting during the entire duration of my Hennepin County court cases.

My criminal charges originated on January 21, 2023 and consist of:

- **One Count:**  
 ‘Reckless Discharge of Firearm Within a Municipality’ - *Mn § 609.66.1a(a)(3)*

- **Three Counts:**

‘Firearm-Serial Number-Receive/Possess With No Serial Number’ - *Mn § 609.667(3)*

- It is relevant to mention that my three charges for ‘No Serial Number’ under Minnesota Statute § 609.667(3) are currently awaiting a decision by the Minnesota Supreme Court due to the statute being ‘constitutionally vague’ – something I can personally attest to due to the fact that I personally spent many hours researching and investigating as much information as I could find online in order to make sure I was not breaking any laws prior to building my personal use firearms during the summer of 2020.

The pending decision from the Minnesota Supreme Court involves the case of *State v. Vagle*, 999 N.W.2d 909 (Minn. Ct. App. 2023) <sup>1</sup>

Due to my current status of being deemed ‘incompetent to stand trial’ my pending charges have not technically been prosecuted as of yet within the Hennepin County Court.

Furthermore, due to the fact that I am currently under a ‘stayed order of civil commitment’ I also am not technically ‘committed’ based upon the commonly understood language and definitions of the courts rules and guidelines. This technically places me in a sort ‘gray area’ so to speak – one which actually makes it possible for me to pursue my federal civil rights case without running into any issues involving the criteria set forth in *Heck v. Humphrey*, 512 U.S. 477 (1994) for example – something I in fact preemptively addressed in section VII of my federal civil rights complaint.

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1 *State v. Vagle*, A23-0863, 999 N.W.2d 909 (Minn. Ct. App. 2023):

<https://casetext.com/case/state-v-vagle-3>

Minnesota Supreme Court grants petition for review in *State v. Vagle*, A23-0863:

<https://www.johnsonericksonlaw.com/blog/250w0r0iyuxhevwx9tbjuwvchstmzr>

Minnesota Statute §609.667 vs privately made firearm:

<https://gallagherdefense.com/2023/12/17/privately-made-firearm/>

**C. General Overview of My Reasons for Filing This Complaint**

All three of my pro se filed cases (MN COA, MN District Court, and 8th Circuit COA) directly address, and involve the very concerning, and blatantly unethical actions, and behavior of my current defense counsel, Bruce M. Rivers. What is currently taking place insofar as his outright refusal to withdrawal from my case despite three direct requests, a pro se filed motion for substitute counsel, and being named a defendant in my federal case is unprecedented in my opinion as his actions defy all logic and commonly understood actions that an attorney in his position would normally be expected to take.

In fact, it is the sheer amount of ‘issues’ and unethical actions involving Bruce M. Rivers as a whole that is the entire reason why I felt it necessary to submit this complaint in the form of a structured legal brief of sorts as there is no other possible way I’d be able to adequately convey the substantial amount of information otherwise.

All of these concerns are covered in great detail in the subsequent sections of this complaint.

**III. MINE AND BRUCE RIVERS LONGSTANDING RELATIONSHIP****A. Background**

I have known Bruce Rivers for nearly 25 years at this point, as I first met him when I was just 19 or 20 years old. This completely random introduction took place after I received a ‘Pedestrian on the Freeway’ ticket for writing "Fire Denny Green" outside the Minnesota Vikings' training facility by trudging through the fresh snow with me feet as I jumped from each giant letter, to the next. The incident gained local, and national media attention which included helicopter shots of my ‘snow writing’ being shown on cable sports show at the time, in addition to me calling into a local radio station and being interviewed on the air about it.

When I told the radio station I received a ticket for my actions, the radio station solicited an attorney to call in and represent me pro bono - Bruce Rivers is the one who got through and ended up representing me. The ticket ended up resulting in a \$25 total fine,

and the prosecutor I ended up meeting at the Hennepin County Court in Minnetonka was actually excited to meet me as he thought what I did was hilarious

Following this incident I would end up retaining Bruce Rivers for various other legal troubles I had a habit of getting into when I was younger - almost all of which involved alcohol in one form or another, but never any violent offenses. The last time I actually retained Bruce Rivers prior to February of 2023, was in 2007 - 16 years prior. Many of my personal friends have also retained Bruce Rivers, and in general Bruce Rivers is considered to be a skilled, and highly sought after attorney which makes my current situation with him that much more out of character, unusual, and concerning as me and Bruce Rivers have always maintained a trusting, and friendly relationship over the years.

What I would characterize as our ‘friendship’ is in fact clearly evident based on all of our communications that took place prior to the “powerful people” comment he made on May 22, 2023 at 3:13 PM over the phone as I actually maintain many text messages, call records, and emails between us spanning all the way back to spring of 2020 – which is when I first moved back to Minnesota from Los Angeles due to Covid.

**B. Mine and Bruce Rivers Interactions Prior to Retainining Him in Early February 2023**

I first got in contact with Bruce Rivers again shortly after I moved back to Minneapolis from Los Angeles in early April of 2020 due to one of my friends getting a DWI – and so of course I told him to call Bruce Rivers. Just as I had told many friends before him as Bruce Rivers has always been my go-to guy for all things legal.

Following this brief exchange I ended up reaching out to Bruce many times for all sorts of legal questions, referrals, and guidance. Besides contacting him to ask questions or obtain something from him I would also send him random messages such as excitedly sharing my new business and patent adventure with him that came into being not long after.

*Video verification of the following text messages can be downloaded via the following two links:*

- **Early Bruce Rivers Texts-01:** [Drive.Proton.Me/urls/YBXZZW8F8R#nv1gLSyGmA8p](https://drive.proton.me/urls/YBXZZW8F8R#nv1gLSyGmA8p)
- **Early Bruce Rivers Texts-02:** [Drive.Proton.Me/urls/8TCYRSCCY8#SGYe1ewc7Xgq](https://drive.proton.me/urls/8TCYRSCCY8#SGYe1ewc7Xgq)

These screencap videos from my phone provide a lot of additional insight and context as opposed to simply viewing the images below.

27-CR-23-1886  
 Filed in District Court  
 State of Minnesota  
 4/9/2024 9:22 AM

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**Bruce-Rivers-Texts-01**

**Bruce-Rivers-Texts-02**

**Bruce-Rivers-Texts-03**

**Bruce-Rivers-Texts-04**

**Bruce-Rivers-Texts-05**

**Bruce-Rivers-Texts-06**

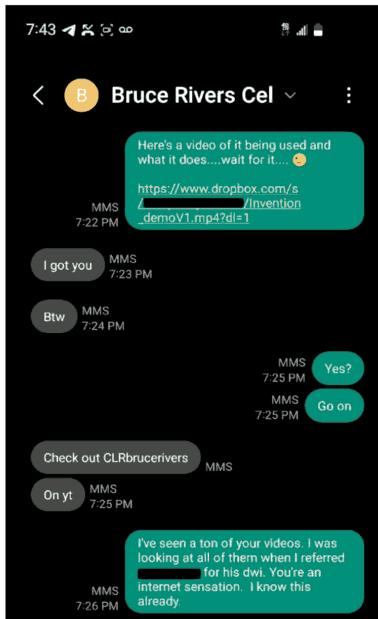
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27-CR-23-1886

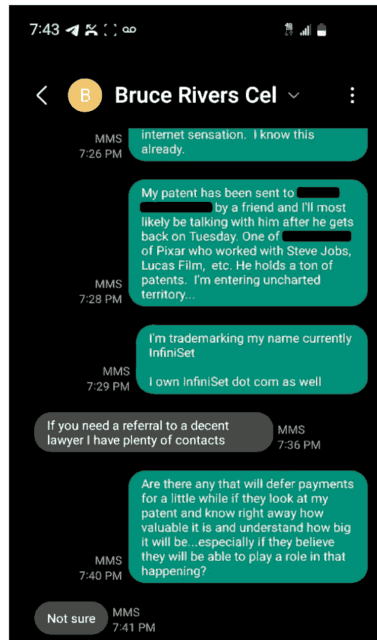
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Filed in District Court  
State of Minnesota  
4/9/2024 9:22 AM

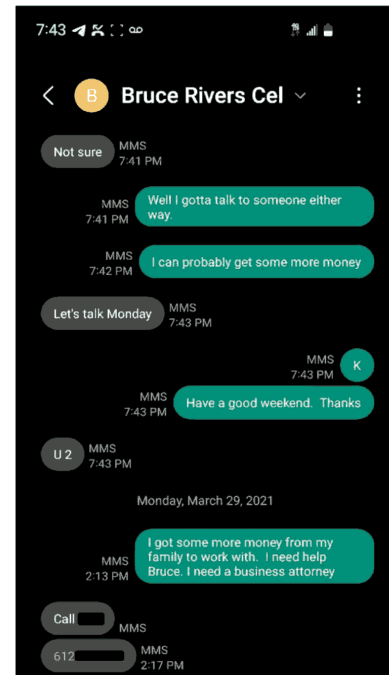
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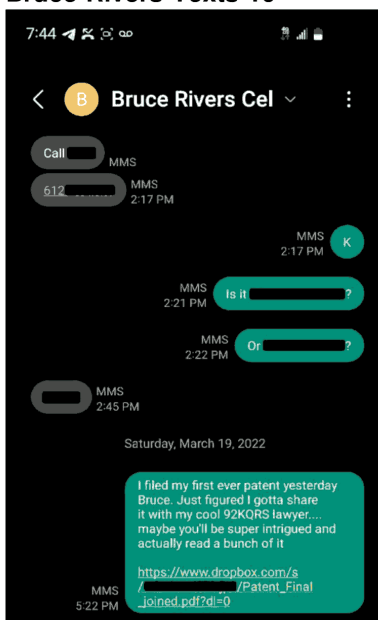
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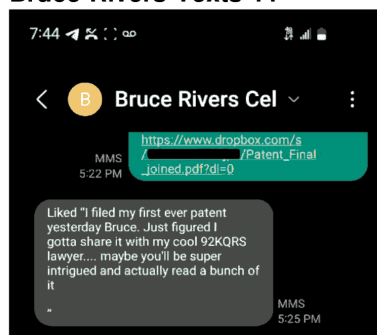
## Bruce-Rivers-Texts-09



## Bruce-Rivers-Texts-10



## Bruce-Rivers-Texts-11



## Bruce-Rivers-Texts-12

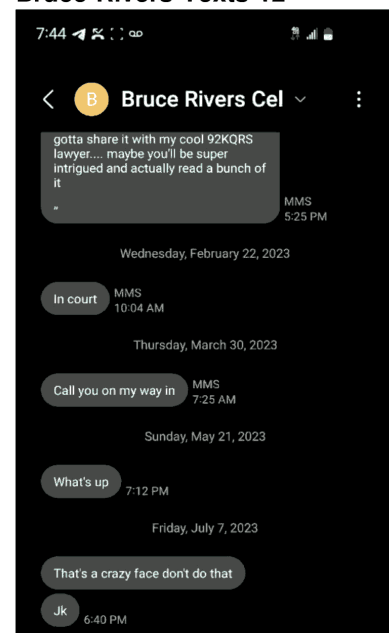


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As further proof of Bruce Rivers being the person I have always turned to for any and all legal matters, he was in fact the first, and only other 'legal expert' besides my patent attorney that I contacted right away upon my initial discovery of the Stephan Trojansky patent application I had

inadvertently stumbled across the evening of November 8, 2022 only to realize it was for the exact same technology contained in my soon to be granted US Patent 11,577,177.

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Filed in District Court  
State of Minnesota  
4/9/2024 9:22 AM

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Bruce-Rivers-Calls-01	Bruce-Rivers-Calls-02	Bruce-Rivers-Calls-03
<div style="background-color: #333; color: white; padding: 10px;"> <p style="font-size: x-small; margin: 0;">November 11, 2022</p> <div style="margin-bottom: 10px;"> <p style="font-size: x-small; margin: 0;">6:42 AM</p> <p style="font-size: x-small; margin: 0;">Outgoing call/Mobile/0 mins 1 sec</p> </div> <div style="margin-bottom: 10px;"> <p style="font-size: x-small; margin: 0;">6:48 AM</p> <p style="font-size: x-small; margin: 0;">Incoming call/Mobile/11 mins 40 sec</p> </div> <div style="margin-bottom: 10px;"> <p style="font-size: x-small; margin: 0;">4:54 PM</p> <p style="font-size: x-small; margin: 0;">Outgoing call/Mobile/0 mins 42 sec</p> </div> <p style="font-size: x-small; margin: 0;">February 4, 2023</p> </div>	<div style="background-color: #333; color: white; padding: 10px;"> <p style="font-size: x-small; margin: 0;">March 21, 2023</p> <div style="margin-bottom: 10px;"> <p style="font-size: x-small; margin: 0;">12:46 PM</p> <p style="font-size: x-small; margin: 0;">Outgoing call/Mobile/0 mins 14 sec</p> </div> <div style="margin-bottom: 10px;"> <p style="font-size: x-small; margin: 0;">1:00 PM</p> <p style="font-size: x-small; margin: 0;">Incoming call/Mobile/1 min 26 secs</p> </div> <p style="font-size: x-small; margin: 0;">March 23, 2023</p> <div style="margin-bottom: 10px;"> <p style="font-size: x-small; margin: 0;">7:27 PM</p> <p style="font-size: x-small; margin: 0;">Outgoing call/Mobile/1 min 32 secs</p> </div> </div>	<div style="background-color: #333; color: white; padding: 10px;"> <p style="font-size: x-small; margin: 0;">April 1, 2023</p> <div style="margin-bottom: 10px;"> <p style="font-size: x-small; margin: 0;">10:54 AM</p> <p style="font-size: x-small; margin: 0;">Outgoing call/Mobile/2 mins 21 sec</p> </div> <p style="font-size: x-small; margin: 0;">April 3, 2023</p> <div style="margin-bottom: 10px;"> <p style="font-size: x-small; margin: 0;">5:23 PM</p> <p style="font-size: x-small; margin: 0;">Outgoing call/Mobile</p> </div> <div style="margin-bottom: 10px;"> <p style="font-size: x-small; margin: 0;">8:00 PM</p> <p style="font-size: x-small; margin: 0;">Outgoing call/Mobile/0 mins 13 sec</p> </div> </div>

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**Video verification of all Bruce Rivers call logs can be downloaded via the following link:**

- **Bruce Rivers Call Log :** [Drive.Proton.Me/urls/YBXZZW8F8R#nv1gLsyGmA8p](https://drive.proton.me/urls/YBXZZW8F8R#nv1gLsyGmA8p)

During the early, Friday morning hours of November 11, 2022 I called and spoke to Bruce Rivers at 6:48 AM about the exciting, yet somewhat concerning situation I had suddenly found myself in. We spoke for nearly 12 minutes as I explained all of it to him, hoping to come away with some sort of guidance and advice.

27-CR-23-1886  
Filed in District Court  
State of Minnesota  
5/6/2024 2:45 PM

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Matt Guertin Patent / Netflix Patent

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From mattguertin <MattGuertin@protonmail.com>  
To Bruce Rivers<riverslawyers@aol.com>  
Date Friday, November 11th, 2022 at 7:51 AM

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Bruce,

[Here you go](#) (dropbox automatic download - 288mb)

All packaged up nice and neat with a little bow on top.

~Matt Guertin  
763-221-4540

Sent with [Proton Mail](#) secure email.

**'Here you go' =**  
<https://www.dropbox.com/sh/eyt2brdy1dt2qhk/AABr2Y5Wt8CKLNVdwRH0WDFua?dl=1>

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Less than an hour after hanging up from our call he had an email in his inbox from me that included a complete informational packet I had assembled of all pertinent background information for the patent application we had discussed just moments prior.

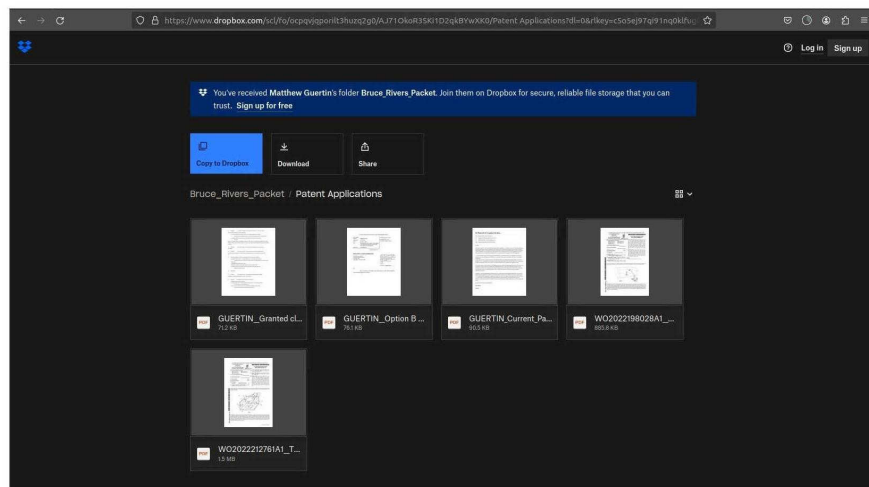
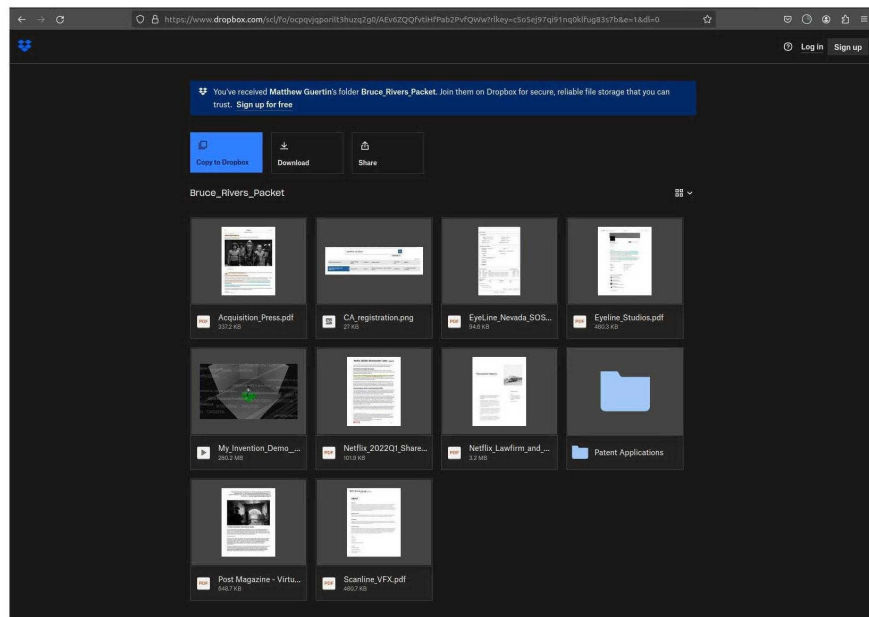
27-CR-23-1886

Filed in District Court  
State of Minnesota  
5/6/2024 2:45 PM

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## Dropbox Link - 'Bruce\_Rivers\_Packet'

### Folder Contents



<https://www.dropbox.com/sh/eyt2brdy1dt2qhk/AABr2Y5Wt8CKLNVdwRH0WDFua?dl=1>

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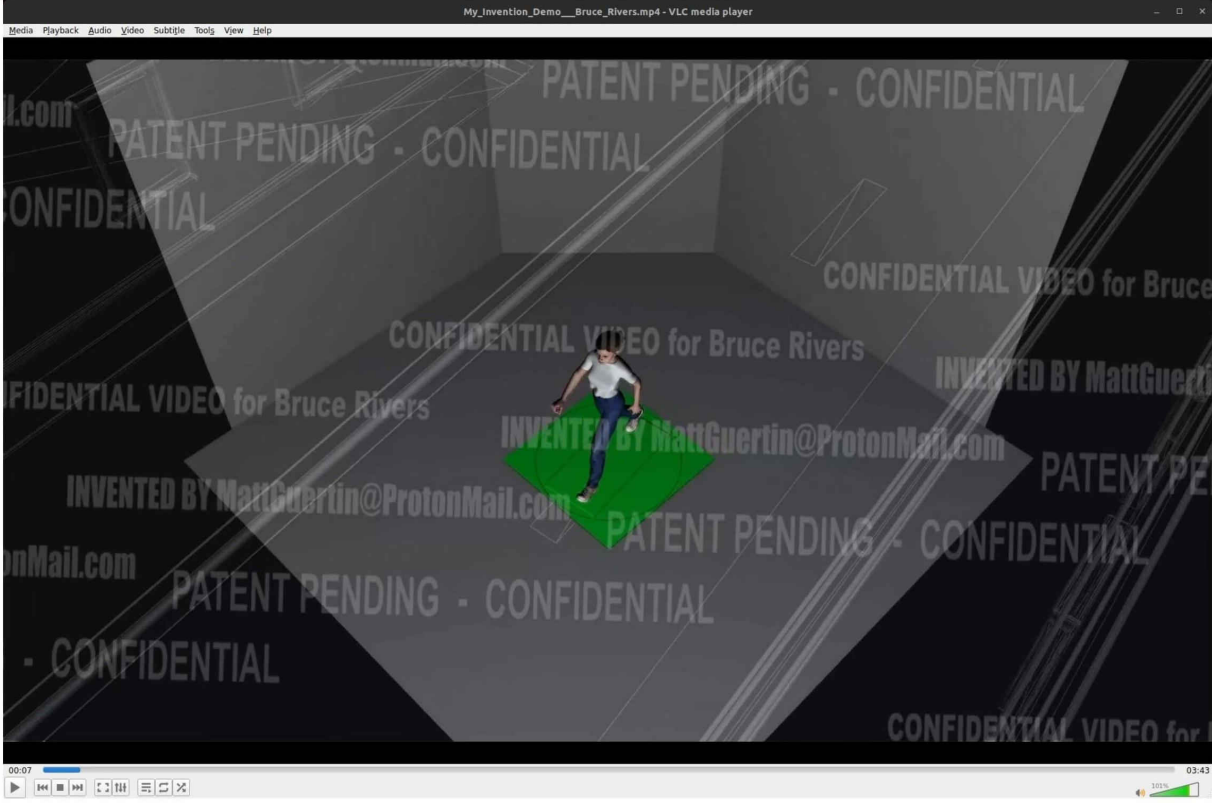
27-CR-23-1886

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Filed in District Court  
State of Minnesota  
5/6/2024 2:45 PM

## My\_Invention\_Demo\_\_\_\_Bruce\_Rivers.mp4

image screen capture from video



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27-CR-23-1886

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Filed in District Court  
State of Minnesota  
5/6/2024 2:45 PM

## Re: Matt Guertin Patent / Netflix Patent

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From mattguertin <MattGuertin@protonmail.com>  
 To Bruce Rivers<riverslawyers@aol.com>  
 Date Friday, November 11th, 2022 at 7:53 AM

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My provisional application was filed on March 19th, 2021  
 Trojansky/Netflix was filed on March 31st, 2021

I win

Sent with [Proton Mail](#) secure email.

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**Friday, January 13, 2023:**

- I sent the following email to Mr. Rivers in the hopes that he may be able to recommend someone who would be able to help investigate that patent fraud I had been witnessing take place for nearly five weeks at that point. Not only had I been ‘witnessing’ – but I had also been actively conducting my own personal investigation the entire time as well which involved downloading and collecting a substantial amount of digital forensic evidence in order to try and protect what I had dedicated nearly the last two years straight of my life to at that point.

27-CR-23-1886

Filed in District Court  
 State of Minnesota  
 5/6/2024 2:45 PM

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**Bruce. You gotta help me get a bunch of eyes on this**

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From mattguertin <MattGuertin@protonmail.com>  
 To Bruce Rivers<riverslawyers@aol.com>  
 Date **Friday, January 13th, 2023 at 5:14 PM**

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Bruce,

This is happening in real-time right now. It is nuts. They are just editing the internet archive pages like it's the website for their family business.

It discredits the entire archive. Any cases which involved the archive get reexamined. This is not the first time this has been done. There is obviously an system in place to do what is being done here.

**Here is a link to all of the supporting files. It is 4.6gb -** [https://www.dropbox.com/s/6hqj7r8m7cdi9in/Data\\_Analysis\\_and\\_Files\\_Proving\\_Fraud\\_at\\_Internet\\_Archive\\_1up.zip?dl=0](https://www.dropbox.com/s/6hqj7r8m7cdi9in/Data_Analysis_and_Files_Proving_Fraud_at_Internet_Archive_1up.zip?dl=0)

And I attached one of the data analysis spreadsheets I created - there are more in the download file. All you gotta do is open the spreadsheet. it is clear as day. Anyone understands it...even my mom.

**Do you know any federal investigators or anyone that would be interested in investigating this? I am trying to figure out what to do**

Thanks,

~Matt Guertin

Sent with [Proton Mail](#) secure email.

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111.24 KB    1 file attached

**DATA\_ANALYSIS\_ALL\_WEB\_FILES\_tutorials\_how-to-film-models.xlsx**
**111.24 KB**

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### C. Origination of My Criminal Charges

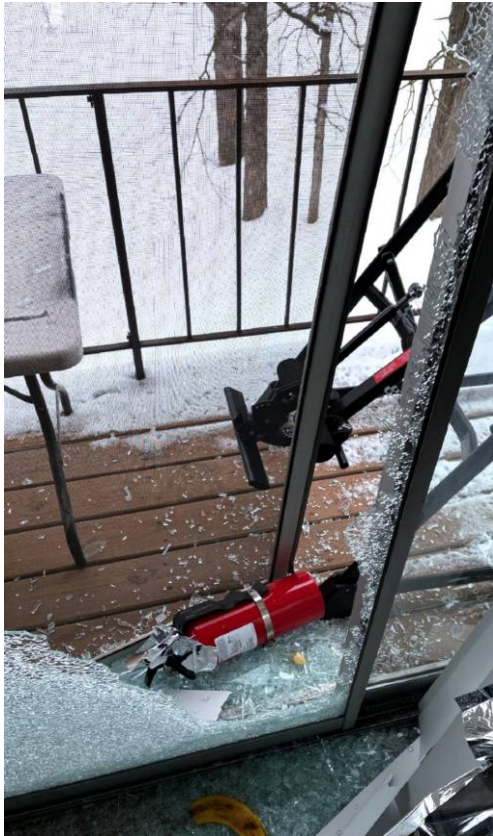
**January 21, 2023:**

- Just eight days after sending the above email to Bruce Rivers seeking help for the patent fraud situation I was witnessing I would be arrested for firing a gun into the air for the explicit purpose of ‘calling’ the police via a very loud, and unmistakable analog sound due to all of my electronic devices being hacked into, my realization that Bluetooth was being employed to still access my computer somehow even though my ethernet cable had been unplugged from the internet and my Wi-Fi adapters disabled, and a rather abrupt realization that what had initially started out feeling like a computer game had suddenly become very real – especially considering the extremely limited range of Bluetooth.

Those helping to carry out the patent fraud I had been investigating from afar via the safety of the internet and a computer monitor had now apparently ended up right outside my door as far as I was concerned. An acute stress reaction in which I quietly sat frozen in fear for nearly two days trying to figure out what I should do ended up being the result, followed by my intended goal of being arrested and exiting my apartment – rather traumatized, but alive – and safe.







They are going to kill me  
 Stealing my patent  
 "Illusion of movement"  
 CASE # 23-000151  
 2pm

I went to the FBI in  
 Brooklyn Center first -  
 before Mark PD - who knows  
 if that call actually got through

I didn't  
 want to  
 have to do  
 this but it  
 was the  
 only way I  
 could be sure  
 that my call  
 actually got  
 through.  
 They all went  
 up into the  
 sky out my  
 bedroom  
 window.  
 I hope I  
 don't die but  
 this was the  
 best option  
 I could think  
 of  
 -Matt

As I look around my apartment I'm absolutely  
 aware that it looks like I've lost my mind. It  
 almost makes me wonder if the whole point of everything  
 going on was to cause me to get to this point but then  
 again there really is a Netflix patent which I have in fact  
 filed 12 days before and which they really have spent  
 at least \$4 billion dollars on so far. I'm scared -  
 I'm afraid that I'm going to be killed one way or another  
 no matter what option I choose as far as trying to  
 leave my place and get help. I'm afraid that no matter what  
 whoever is behind all of this has one million different ways  
 to set me up or frame me if they want. Netflix found out  
 about my patent way before I found out about theirs. That's  
 for sure. The only thing I have which proves I'm not  
 crazy is all of the files I've been collecting and  
 downloading which proves everything that's been going on  
 has in fact been happening and as crazy as my place appears  
 right now it makes absolute sense as the smartest way  
 to keep myself protected. A QUARTER BILLION DOLLARS -  
 That's pretty crazy too - so crazy that it would make complete  
 sense why someone would be willing to put what I ultimately  
 believe is a 'hit' out on me. There's a lot of things  
 I was never supposed to realize or figure out - This I am  
 quite sure of - one of those would be the existence of the  
 netflix patent which was a result of me searching the  
 patent database after I wrote an email to Mark Roberts  
 Motion Control and the CEO responded 3 weeks later -  
 said he was very interested in my invention but then  
 said he was very interested in my invention but then  
 said he was very interested in my invention but then

party prior art submission. This directly contradicts the report's assertion that Guertin's claims about Netflix and Microsoft are delusional.

<b>(12) United States Patent</b>		<b>(10) Patent No.: US 11,810,254 B2</b>
<b>Trojansky</b>		<b>(45) Date of Patent: Nov. 7, 2023</b>
<b>(54) DISPLAYING A SCENE TO A SUBJECT WHILE CAPTURING THE SUBJECT'S ACTING PERFORMANCE USING MULTIPLE SENSORS</b>		<b>(56) References Cited</b> U.S. PATENT DOCUMENTS 11,577,177 B2 † 2/2023 Guertin 2013/0181901 A1 * 7/2013 West ..... H04N 9/3147 345/1.3 2015/0055101 A1 * 2/2015 Kim ..... H04N 9/3147 353/94 2018/0059528 A1 * 3/2018 Gocke ..... H04N 9/3147 2022/0319115 A1 * 10/2022 Trojansky ..... B25J 19/021
<b>(71) Applicant: Netflix, Inc., Los Gatos, CA (US)</b> <b>(72) Inventor: Stephan Trojansky, Los Angeles, CA (US)</b> <b>(73) Assignee: Netflix, Inc., Los Gatos, CA (US)</b>		OTHER PUBLICATIONS Enrico Calabrese†, DHP19: Dynamic Vision Sensor 3D Human Pose Dataset, 2019, pp. 1-10.* PCT/US2022/035002 International Search Report and Written Opinion dated Oct. 10, 2022.
<b>(*) Notice:</b> Subject to any disclaimer, the term of this patent is extended or adjusted under 35 U.S.C. 154(b) by 0 days.		* cited by examiner † cited by third party
<b>(21) Appl. No.: 17/709,126</b> <b>(22) Filed: Mar. 30, 2022</b>		
<b>(65) Prior Publication Data</b>		

#### 68. Evidence of Conspiracy:

Guertin claimed advanced AI was being used against him. This has now been proven true with the discovery of AI-generated evidence used to manipulate his court case, substantiating his claims of a broader conspiracy.

- Now that mine and Bruce Rivers long-standing, and friendly relationship has been thoroughly established I believe what is taking place currently should become all the more obvious, and concerning.

The following sections are ordered based on the most serious ethical violations of Bruce Rivers being listed first – as there is essentially an entire laundry list of blatant violations of his to contend with currently.

## IV. CONSPIRACY AGAINST ME UTILIZING FRAUDULENT DISCOVERY

### A. First Set of FRAUDULENT DISCOVERY | Originated From Within the Court

**August 3, 2023:**

- My court appointed attorney at the time, Michael Biglow, insisted on emailing me discovery photographs that I never asked for, or requested. Because of this I didn't even