

**UNITED STATES DISTRICT COURT**  
**FOR THE**  
**EASTERN DISTRICT OF WISCONSIN**

U.S. District Court  
Wisconsin Eastern  
**NOV - 9 2017**  
FILED  
Stephen C. Dries, Clerk

**UNITED STATES SECURITIES AND EXCHANGE COMMISSION** )

**PLAINTIFFS** )

**v.** )

**RONALD HENRY VAN DEN HEUVEL and** )

**GREEN BOX NA DETROIT, LLC** )

**DEFENDANTS** )

)

**CIVIL ACTION NO. 17-CV-1261** )

**NOTICE OF MOTION AND MOTION TO STAY CIVIL PROCEEDINGS**  
**PENDING RESOLUTION OF CRIMINAL PROCEEDINGS**

**JUDGE: THE HONORABLE WILLIAM GRIESBACH**

**DATE:** \_\_\_\_\_

**TIME:** \_\_\_\_\_

**ALL PARTIES AND THEIR ATTORNEYS OF RECORD**

PLEASE TAKE NOTICE that on \_\_\_\_\_,  
2017 in Courtroom \_\_\_\_\_ located at  
\_\_\_\_\_ Jefferson Street in Green Bay, Wisconsin  
at the Federal Courthouse in front of Judge Greisbach, Defendant  
Ronald Van Den Heuvel will and hereby does move the Court issue an  
Order staying this civil action as against Defendant pending resolution  
of the indictment and attendant criminal proceeding in United States v.  
Ronald Van Den Heuvel, 17CR1601.

This Motion is made on the grounds that a stay of this civil action  
is necessary to protect Mr. Van Den Heuvel's Fifth Amendment rights in  
connection with the above-referenced criminal proceeding, which arises  
from the same underlying facts as this civil action. Mr. Van Den Heuvel  
and his company will be greatly prejudiced by their inability to  
meaningfully defend themselves in this action if forced to proceed prior  
to the criminal case 17CR1601 resolution.

This Motion to Stay is further justified due to the contemptible  
action to obtain the Search Warrant which was received by Sargent  
Shatner which was received with perjured statements, omissions of  
evidence and altered evidence and fabricated statements. Not returning  
these unlawfully taken exculpatory documents that Shatner wont let Van  
Den Heuvel ability to receive justice.

This is also based on the fact that 830,000 pages of the unlawfully  
taken 4,700,000 documents have yet to be returned from the July 2, 2015  
search warrant. This was the largest confiscation of documents in Brown  
County's 200 year history by a ten fold. The majority of these  
unreturned documents are exculpatory to Mr. Van Den Heuvel's defense  
of all of these cases. The first of four legal return requests for documents  
occurred in November of 2015. Since these documents taken by Shatner  
over two years ago are not returned it is our conclusion that Sargent  
Shatner had these documents either destroyed or they were lost due to  
incompetence.

Ronald Van Den Heuvel has already pled guilty to certain charges  
which released Kelly Van Den Heuvel's charges and reduced her stress  
which has greatly improved her breast cancer treatment results. It was  
never explained to Ron Van Den Heuvel that not returning exculpatory  
documents that are taken in a general search is unlawful and can result in  
a case being dismissed.

This Stay Motion will be further based on forthcoming  
Memorandum of Authority and Ronald Van Den Heuvel's Affidavit in  
support of Defendant's Motion to Stay the Civil Action and incorporated  
herein by reference, all other pleadings and files in this matter, and such  
additional evidence and argument as may be permitted by this Court.

Dated: \_\_\_\_\_, 2017

RONALD HENRY VAN DEN HEUVEL, pro se defendant

