

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

UNITED STATES OF AMERICA,
Plaintiff,

v.

Case No. 16 CR 64

RONALD D. VAN DEN HEUVEL,
Defendant.

MOTION TO SUPPRESS PHYSICAL EVIDENCE

COMES NOW the above named defendant, Ronald D. Van Den Heuvel, through Attorney Robert LeBell, and hereby moves the Court for an order to suppress all evidence taken in the execution of search warrants on July 2, 2015, at the following locations:

- 2077 Lawrence Drive, Suite A;
- 2077 Lawrence Drive, Suite B;
- 500 Fortune Avenue;
- 2107 American Boulevard; and
- 2303 Lost Dauphin Road.

The defendant requests an evidentiary hearing. It is anticipated that four hours of court time will be required.

Dated at Milwaukee, Wisconsin this 16th day of June, 2017.

Respectfully submitted,

/s/ Robert G. LeBell

Robert G. LeBell, SBN 01015710
Attorney for Defendant
309 N. Water Street, Suite 350
Milwaukee, Wisconsin 53202
(414) 276-1233