

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

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**UNITED STATES OF AMERICA,**  
Plaintiff,

v.

**Case No. 16 CR 64**

**RONALD D. VAN DEN HEUVEL,**  
Defendant.

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DEFENDANT'S LOCAL RULE 12c STATEMENT

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As and for compliance with Local rule 12c, the defendant states the following:

The parties have telephonically and in person discussed the defendant's motion to suppress. It is believed that the following undisputed and disputed facts remain with respect to the argument that the search exceeded the allowable scope. It is anticipated that three hours of in court time is needed for the evidentiary hearing.

UNDISPUTED FACTS

1. That search warrants issued in this matter were executed on July 2<sup>nd</sup> 2015.
2. That numerous documents and materials were seized by law enforcement and were removed from the target locations.
3. That although items were returned to the defendant on August 8<sup>th</sup>, 2015, some remain with law enforcement to this day.

DISPUTED FACTS

1. That the seizure exceeded the authorized scope of the warrants.
2. That there is a lawful reason for retention of those items

which have not yet been returned.

Dated at Milwaukee, Wisconsin this 19<sup>th</sup> day of June, 2017.

Respectfully submitted,

*/s/ Robert G. LeBell*

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