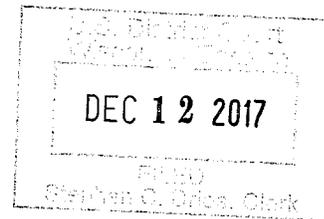


December 12, 2017

Honorable Judge William C. Griesbach  
Jefferson Court Building  
125 S. Jefferson Street  
Room 102  
Green Bay, Wisconsin 54301-4541  
FROM: Ronald Henry Van Den Heuvel



RE: *MEMORANDUM in for Cases 16-CR-64; 17-CU-1261; 17-CR-160*

I, Ronald Henry Van Den Heuvel, the defendant in the above named cases, am submitting this Memorandum to the court *Pro Se* for the above referenced cases. I will be asking the Court to review the facts set forth in this Memorandum prior to the submission of Motions to Dismiss to be filed on or before December 20<sup>th</sup>, 2017. I, Ronald Henry Van Den Heuvel, could not delay any longer in the submission of this Memorandum and the backup Affidavit by December 18, 2017. It has recently come to pass that within the last four weeks approximately 10% of the missing 830,000 pages of exculpatory evidence taken in the *general search* has been made available. In addition, I have new evidence that the IRS, SEC, FDIC, DOJ and FBI were all provided documents obtained from the general search. I am requesting a delay in the sentencing for *Case 16-CR-64*. The new exculpatory documents recently made available require review. The Motions to Dismiss will include *Case 16-CR-64*. I also need to be appointed or retain counsel.

- I. It is my belief, and the evidence will show, that Sergeant Shartner used perjury to obtain the Search Warrants executed on July 2, 2015. The Sergeant also omitted evidence extensively to obtain these Search Warrants. She talked to or knew of Exim Bank, Engineers, Scientists, High-Tech Equipment Suppliers, Lenders and Patents but chose to omit this evidence. It begs the question why Sergeant Shartner was let go from the police force. It is my belief that no officer could be that poorly trained or incompetent. Clearly her intent was to damage and 'shut down' Ron Van Den Heuvel and his companies as she stated openly on the day the search warrants were executed.

- II. It is my belief, and the evidence will show that the Search Warrants were “unconstitutionally overly broad” in scope when issued, thereby creating a “dragnet” effect resulting in law-enforcements seizure of “wholly irrelevant and private information” such as the seizure of company and personal computers, cell phones and private documents from eleven parties not listed on the Search Warrants. Why would the Sergeant take computers instead of mirroring the drives or the servers like the FBI had done. It is my contention that is was to back up her statement that she was shutting Ron Van Den Heuvel and his companies down for good. Why else would she take lab jars and product samples? Why would she wait until Ron Van Den Heuvel and his family were out of town to execute the search warrants?
- III. It is my belief, and the evidence will show the seizure of any and all documents and computers belonging to Ty Willinghanz , Esq., of Ty Will Law, who had previously represented Paul Piikkila, Kelly Van Den Heuvel, Julie Gumban and KYHKJG, LLC., breached Lawyer/Client confidentiality. The aforementioned were additionally not on the search warrants along with other clients of Ty Will Law. Clear and compelling evidence of Sergeant Shartners lack of knowledge with regard to the execution of a search warrant or her total disregard for the applicable laws governing search warrants. In addition, the government knowingly took documents from this Independent private attorney.
- IV. It is my belief, and the evidence will show, the Search Warrants were executed as a *general search* with the parameters set forth by the Honorable Judge Zuidmulder being grossly disregarded. As Sergeant Shartner stated, ‘*she did not have enough time to follow the search warrants and decided to take everything*’. The facts will show that officer Shartner’s conduct violated the not only the defendant’s constitutional rights, but the constitutional rights of all the individuals whose personal documents were unlawfully confiscated during the general search. *Affidavit* to follow.
- V. It is my belief, and the evidence will show, that *Brown County* has been grossly negligent in its handling and mishandling of the documents and materials confiscated; in their failure to return documents as requested

by the court in a timely manner 'due to the *substantial volume*', as stated by District Attorney David Lasee (attached). Four million-seven hundred thousand pages of documents were seized dating from 1969 to July 2015, which can only be classified as "a dragnet or general search"; filling "more than a semi" by Brown County's own admission. Sergeant Shartner stated her objective was to close down Ronald Van Den Heuvel and his family because they are 'union busters'. See her calculated and vindictive emails to Barclays Bank in London England regarding Ron Van Den Heuvel's Ghana \$412,000,000 project. This action, along with her providing perjured statements and unsolicited phone calls to fourteen other financial institutions and eighteen cities is further evidence that Sergeant Shartner's intent was to 'shut Ron Van Den Heuvel down' as she had stated.

- VI. It is my belief, and the evidence will show, that the Search Warrant executed at the Van Den Heuvel residence was corrupt, criminally invasive and constituted an unjust search and seizure of personal effects, photos, school records of minor children, personal papers, vast medical records and death records. Almost all "documents and personal items" removed from the home had any bearing on the case and were seized regardless of their privileged nature. This is in clear violation of the plaintiff's Fourth Amendment rights, as well as those of his wife and minor children respectively. Moreover, Kelly Van Den Heuvel, Julie Gumban, Hayden Van Den Heuvel, Henry Van Den Heuvel and Kate Van Den Heuvel were not listed on the search warrant. They had a reasonable expectation of privacy, which was blatantly and irreparably breached when private documents were subsequently unmasked and shown to other private citizens and the public. Ronald Van Den Heuvel's private documents from his home and offices, outside the Search Warrants, were additionally unmasked then shown to other private citizens and the public causing great financial, personal and family damages. I plead and pray before the court, that unjust punishment coupled with the loss of over 50 million investment dollars has been enough. What took forty years of hard work to build, one corrupt officer, through a general search, nearly destroyed it all. I now understand what a corrupt officer is capable of. She can tear down the fabric of our constitution and cause great injustice.

- VII. It is my belief, and the evidence will show, that the government has been grossly negligent, albeit criminal, in its failure to return over 830,000 pages of exculpatory required documents. The corrupt officer performed either "destruction of evidence" or the "convenient misplacement" of file cabinets (5) and 155 bank boxes in and of itself is a blatant disregard for and violation of the law. Imagine, when requesting the return of medical records of my wife, who is dealing with breast issues, it took over eighteen months to get the records, yet, when a security company's engineer had her firm's attorney demand her documents back that was confiscated in the general search, they were returned within one day.
- VIII. It is my belief and the evidence will show, that Sergeant Shartner altered evidence then gave this altered evidence to the IRS, SEC, FDIC, DOJ and FBI who shared it to other private parties. In court, Sergeant Shartner stated that she had to rearrange the evidence, which is very clearly seen in what she has returned to date and disseminated to other parties. Intentionally altering evidence is corruption at its highest level.
- IX. It is my belief and the evidence will show, that this witch hunt was conducted with malicious intent and was done to slander and destroy Ronald Van Den Heuvel and his family. This was done using the IRS, SEC, FDIC, DOJ, and the FBI with illegally obtained documents, altered evidence, omitted evidence, perjured statements, and fabricated statements by Sergeant Shartner and Agent Hager. Agent Hager spent significant time and Sergeant Shartner spent over 470 days going through Ronald Van Den Heuvel's private illegally obtained documents. Together, they fabricated statements, submitted perjured statements, altered evidence and omitted evidence to obtain search warrants, arrest warrants and indictments. Kelly Van Den Heuvel's own attorney, Andrew Porter, Esq., stated that DOJ and their agents '*are allowed to lie*'. For similar corrupt illegal actions, local law enforcement officers have been dismissed along with the cases and convictions associated with these cases due to these illegal actions.

- X. It is my belief and the evidence will show that Godfrey and Kahn had assisted Sergeant Shartner and Agent Hager. Steve Peters, party to seven indictments, was a shareholder of ST Paper and Tak Investments. That Godfrey and Kahn was found guilty of a civil rights violation by a judge and by Ronald Henry Van Den Heuvel acting *Pro Se*. Godfrey and Kahn was a partner of the Oneida Tribe of Indians Energy Group. Together they made perjured statements about Ronald Henry Van Den Heuvel's involvement with the Oneida Seven Generation's incineration project which Ronald Van Den Heuvel had zero involvement in as evidence will show. Godfey and Kahn continues to give false information to the Oneida Eye in an effort to slander Ronald Van Den Heuvel and improve their Tak case. Paul Piikkila worked for six banks in 11 years and averaged one million dollars each and every month to earn a fee. Godfrey and Kahn represented most of these eleven banks. Godfrey represents ST Paper, Sharad Tak, and Tak Investments. Godfrey and Kahn represented Dr. Marco Araujo, first civilly and then criminally to the DA which is unethical. Godfey and Kahn knows all of these are conflicts of interest. Godfrey and Kahn represented Sharad Tak and Tissue Technology respectively, in a pledge to Nicolet Bank using certain Ronald Van Den Heuvel group assets for the Tak Group to receive funds from the Nicolet note.
- XI. It is my belief, and the evidence will show, that the language used by Sergeant Shartner on the face of the search warrants, i.e., "parties known and unknown" is in clear violation of the Fourth Amendment which imposes a requirement that search warrants "*particularly describe*" the places to be searched and the property to be seized. This means that a warrant must authorize officers to search only in the specific places described in detail, and to seize only the specific items of enumerated property for which probable cause is set forth in the supporting affidavit. The U.S. Supreme Court describes this rule: "General warrants, of course, are prohibited by the Fourth Amendment. The problem posed by the general warrant is of a general, exploratory rummaging in a person's belongings. The Fourth Amendment addresses the problem by requiring a 'particular description' of the things to be seized. As to what is to be taken, nothing is left to the discretion of the officer (Shartner) executing the warrant." (*Andresen v. Maryland*) "The

uniformly applied rule is that a search conducted pursuant to a warrant that fails to conform to the particularity requirement of the Fourth Amendment is unconstitutional." (*Massachusetts v. Sheppard*). Sergeant Shartner stated that she 'listed any and all companies on the search warrants that had a 2077A or 2077B Lawrence Drive address' listed as the company's registered agent on the state's Corporation listings. This is further evidence that she executed a 'general' search warrant, which is prohibited by the Fourth Amendment.

A handwritten signature in black ink, appearing to read "Ronald H. Van Den Heuvel", written over a horizontal line.

Ronald Henry Van Den Heuvel, *Pro Se*

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**UNITED STATES DISTRICT COURT  
FOR THE  
EASTERN DISTRICT OF WISCONSIN  
GREEN BAY DIVISION**

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**UNITED STATES  
SECURITIES AND EXCHANGE  
COMMISSION**  
PLAINTIFF,  
  
v.  
  
**RONALD HENRY VAN DEN HEUVEL and  
GREEN BOX NA DETROIT, LLC**  
DEFENDANTS

CASE NO. 17-CV-1261

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

**JUDGE: THE HONORABLE WILLIAM GRIESBACH**  
**DATE:** \_\_\_\_\_  
**TIME:** \_\_\_\_\_

1 **ALL PARTIES AND THEIR ATTORNEYS OF RECORD**

2 PLEASE TAKE NOTICE that on \_\_\_\_\_,  
3 2017 in Courtroom 102 located at 125 South Jefferson Street in Green  
4 Bay, Wisconsin at the Federal Courthouse in front of the Honorable  
5 Judge William Greisbach, Defendant Ronald Van Den Heuvel will and  
6 hereby does move the Court issue an Order staying this civil action as  
7 against Defendant pending resolution of the indictment and attendant  
8 criminal proceeding in United States v. Ronald Van Den Heuvel,  
9 17CR1601.

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

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

23 This is also based on the fact that 830,000 pages of the unlawfully  
24 taken 4,700,000 documents have yet to be returned from the July 2,  
25 2015 search warrant. This was the largest confiscation of documents in  
26 Brown County's 200 year history by a ten fold. The majority of these  
27 unreturned documents are exculpatory to Mr. Van Den Heuvel's

28 defense of all of these cases. The first of four legal return requests for  
29 documents occurred in November of 2015. Since these documents  
30 taken by Shatner over two years ago are not returned it is our  
31 conclusion that Sargent Shatner had these documents either destroyed  
32 or they were lost due to incompetence.

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

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

45 Dated: 11-27-2017, 2017

46 RONALD HENRY VAN DEN HEUVEL, pro se defendant

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