

STATE OF WISCONSIN

CIRCUIT COURT

BROWN COUNTY

MARCO ARAUJO, M.D.,

Plaintiff,

-vs-

Case No. 13-CV-463

RONALD H. VAN DEN HEUVEL and
GREEN BOX NA GREEN BAY, LLC,

Defendants.

SUPPLEMENTAL EXAMINATION OF RONALD H. VAN DEN HEUVEL
BEFORE JAMES P. O'NEIL, COURT COMMISSIONER

May 15, 2015

10:07 a.m. to 11:04 a.m.

403 South Jefferson Street

Green Bay, Wisconsin

VOL. II

APPEARANCES:

GODFREY & KAHN, S.C., by JONATHAN T. SMIES,
Attorney at Law, 200 South Washington Street, Suite
100, Green Bay, Wisconsin 54301, appearing on
behalf of the plaintiff.

HINKFUSS, SICKEL, PETITJEAN & WEITING, by JOHN R.
PETITJEAN, Attorney at Law, P.O. Box 1626, Green
Bay, Wisconsin 54305, appearing on behalf of the
defendants.

EXHIBIT

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(None.)	

1 (May 15, 2015, 10:07 a.m.)

2 RONALD H. VAN DEN HEUVEL,

3 being first duly sworn on oath to tell the truth, the
4 whole truth, and nothing but the truth, testifies as
5 follows:

6 MR. O'NEIL: Thank you very much.

7 Jonathan, you may proceed.

8 MR. SMIES: All right. Thank you,
9 Mr. O'Neil.

10 EXAMINATION BY MR. SMIES:

11 Q Good morning, Mr. Van Den Heuvel.

12 A Good morning.

13 Q We last met on Friday the 8th of May, and during the
14 course of your testimony on that day you stated you had
15 received--or, often received cash from friends and
16 family. Do you remember that testimony?

17 A Yes.

18 Q Have you received any cash from friends or family since
19 the last time we met?

20 A Yes.

21 Q And what was that cash?

22 A \$400.

23 Q And who gave you the \$400?

24 A Two hundred came from Phil and another two hundred came
25 from my brother Tim.

1 Q Who is Phil?

2 A Phil Reinhart.

3 Q And what's your relationship with Phil Reinhart?

4 A A friend, and he works with me, partner.

5 Q And the other two hundred was from which brother did
6 you say?

7 A Tim.

8 Q Did you ask either Phil or Tim for this money?

9 MR. PETITJEAN: He--

10 A No.

11 MR. PETITJEAN: We've been all over this.

12 It's about assets and liabilities. It's not if he
13 asked someone for money or they volunteered. It's what
14 he has or doesn't have.

15 Q Do you still have the \$400?

16 A No.

17 Q What did you do with it?

18 A Paid bills.

19 Q We had marked as an exhibit--it was Exhibit 4 in your
20 examination a week ago--a personal financial statement.
21 And I understand we don't have that exhibit with us
22 today, so I have another copy of the same document.

23 MR. PETITJEAN: That's fine.

24 Q Take a look at that, please.

25 (Pause.) Did you review this before you signed it

1 on the 31st of December of 2013?

2 MR. PETITJEAN: That's been asked and
3 answered, Counsel.

4 Q Is that your signature on the last page?

5 MR. PETITJEAN: That's been asked and
6 answered.

7 MR. SMIES: Are you instructing him not to
8 answer whether that's his signature?

9 MR. PETITJEAN: It's--it's--you can go
10 back in the transcript. He's already answered that
11 question.

12 Q Let's look at the third page of this document here. Do
13 you see various schedules here which--one of which is
14 schedule seven, installments, credit lines, and notes?
15 Do you see that Mr. Van Den Heuvel?

16 A Yes.

17 Q There's an entry for Bay Bank, vehicle loan. Do you
18 see that?

19 A Yes.

20 Q And it states there's a \$20,000 balance due. Did I get
21 that correctly?

22 A I see that.

23 Q Do you still owe Bay Bank any money for a vehicle?

24 A Yes.

25 Q And how much do you owe Bay Bank?

1 A Don't know today.

2 Q Are you making any payments on that debt to Bay Bank?

3 A No.

4 Q When did you stop making payments to Bay Bank?

5 A About a year ago.

6 Q And what were-- Were those monthly payments?

7 A Quarterly.

8 Q How much were those quarterly payments?

9 A Don't remember.

10 Q And what was the purpose of that loan? For the

11 purchase of a vehicle?

12 A Years ago it was. I no longer have the vehicle so--

13 Q And what was that vehicle?

14 A I think it was on my Bravada that got in a car

15 accident.

16 Q The next entry there in schedule seven states VHC,

17 Inc., and it says subordinated; 2013, date of maturity;

18 and the balance due says \$74 million. Do you see that?

19 A I do.

20 Q How is it that you came to owe VHC, Inc., \$74 million?

21 A They loaned me \$74 million, my companies. It's a

22 personal guarantee that is now all personal.

23 Q When did they loan you this money? Or, just--just to

24 be clear, you said they loaned your companies money?

25 A Myself and my companies money. That's correct.

1 Q Can you state how much of this \$74 million was loaned
2 to you personally by VHC, Inc.?
3 A I wouldn't know. I know it's under \$5 million.
4 Q So of the \$74 million that VHC, Inc., loaned, somewhere
5 less than \$5 million was loaned to you individually?
6 A Yes.
7 Q And then the remainder was a loan to companies that you
8 have--in which you have an interest?
9 A Yes.
10 Q Do you know which companies?
11 A Not right now.
12 Q It says "Subordinated." Can you explain that?
13 A It falls behind other senior debt but ahead of any new
14 judgments or credits or anything.
15 Q And what is that senior debt, if you know?
16 A There's certain bank loans.
17 MR. PETITJEAN: You're talking about
18 obligations of the companies?
19 THE WITNESS: Of the companies. That's
20 correct. Well, I personally, also.
21 MR. PETITJEAN: Personally guaranteed it.
22 THE WITNESS: Personally guaranteed it.
23 That's correct.
24 Q Have you made any payments on this debt to VHC, Inc.?
25 A The companies may have. I did not.

1 Q You said you think it's less than five million, your
2 loan. Can you say whether it's more than four million?
3 Can you give me a range?

4 A It was borrowed to pay the IRS an obligation that I
5 still hold.

6 Q So let's talk about that. I think originally you said
7 you owed the IRS a little over \$9 million; is that
8 correct?

9 A Due to LLCs and other things, yes.

10 Q And how much, in your mind, do you currently owe the
11 IRS?

12 A Now?

13 Q Yes.

14 A Less than a million.

15 Q So in the case of this loan made by VHC, Inc., to pay
16 the IRS, did VHC, Inc., simply write a check over to
17 the IRS on your behalf? Can you explain how the
18 payment flowed?

19 MR. PETITJEAN: Counsel, we're getting far
20 afield again from his-- His liability to the IRS has
21 been established. He's indicated it's less than a
22 million dollars. He's indicated the debt that he owes.
23 How the transaction took place is outside of
24 supplemental exam.

25 MR. SMIES: So are you instructing him not

1 to answer that question?

2 MR. PETITJEAN: Yes. We're way

3 far--you're--

4 MR. SMIES: Sure.

5 MR. PETITJEAN: --we're looking for assets

6 for collection.

7 Q So, Mr. Van Den Heuvel--

8 MR. PETITJEAN: That's how we got here.

9 Q So, Mr. Van Den Heuvel, I assume you're going to abide
10 by your counsel's instruction?

11 A Correct.

12 Q Let's look at schedule eight on page three of this
13 document that's Exhibit 4. It's credit accounts, bills
14 due, alimony, slash, child support, daycare, et cetera.

15 There's an entry for Vos Electric, \$350,000 due.

16 Do you see that?

17 A Yes, I do.

18 Q Is this-- How did you come to owe Vos Electric
19 \$350,000, if that's, indeed, the case?

20 MR. PETITJEAN: Counsel, is the question,
21 does he owe Vos Electric 350,000?

22 MR. SMIES: Yeah. Let's start with that.

23 A I do.

24 Q Have you made any payments on that indebtedness?

25 MR. PETITJEAN: In what time frame?

1 Q Since the day that you signed this document, the 31st
2 of December of 2013.

3 A I don't believe so.

4 Q Is this a debt you have individually?

5 A It's a debt my wife and I have individually. That's
6 correct.

7 Q How did the debt arise?

8 A I borrowed money to pay a--a tax obligation of some
9 kind that was critical.

10 Q Do you recall when that occurred?

11 A Sometime in 2013.

12 Q The next entry is Chris Hartwig. Do you see that?

13 A Yes.

14 Q It says balance due, \$1,500,000. Did I read that
15 correctly?

16 A Yes.

17 Q Do you still owe Mr. Hartwig that amount?

18 A The amount was not paid. Mr. Hartwig said don't bother
19 me--paying me back.

20 Q Then did Mr. Hartwig forgive the indebtedness?

21 A Don't know. I don't get monthly statements. I don't
22 get a bill anymore. I don't get anything.

23 Q And what did Mr. Hartwig loan you this money for?

24 A I lost a child, and it's a long term--long bill. He
25 paid my hospital bill with my father.

1 Q Just so I understand, you said your father and you then
2 paid the bill for--
3 A The bill was over two and a half million dollars.
4 Q And when--when was that debt incurred or that--that
5 bill?
6 A 2003. It's a long, old bill.
7 Q Did you use that one and a half million dollars for
8 anything other than the payment of the medical bills?
9 MR. PETITJEAN: Counsel, I'll object to
10 that. The--if you want to know if he has any of the
11 money left, there's a fair question. But the--the
12 money has been spent. It's gone.
13 MR. SMIES: Fair enough.
14 Q Is any of that money left?
15 A No.
16 Q And the same question as to the Vos Electric.
17 A No.
18 Q The next entry says Jan Van Den Heuvel. \$2,630,000 is
19 due as of the date you signed this document,
20 December 31st, 2013. Do you see that?
21 A Yes, I do.
22 Q And what's the nature of this indebtedness?
23 A Marital assets. Judgment from the court in a divorce.
24 Q What, if anything, do you still owe on this--this
25 entry?

1 A 2.4 million.

2 MR. PETITJEAN: He testified about that
3 last time.

4 MR. SMIES: Fair enough.

5 Q Next entry, IRS tax liabilities. Is that the same
6 liability you spoke of earlier that was originally over
7 nine million and now is just around a million--or,
8 under a million I think you said?

9 A Correct.

10 Q And then flipping back to the front page of this
11 document, page one, under the applicant side, which
12 appears to contain your information. For employer it
13 states Vos Electric, Spirit Construction, Tissue
14 Technology, and EARTH. Do you see that?

15 A Yes.

16 Q You stated in your prior testimony that you were once
17 an employee of Vos Electric; is that correct?

18 A Correct.

19 Q But I believe you said it was like 2009 when you ceased
20 being employed?

21 A It was 2009 that I ceased getting W-2s.

22 Q That's what it was.

23 A That's what I said.

24 Q Thank you. Have you ever been an employee of Spirit
25 Construction?

1 A Founded it and was president for twenty-some years.

2 Q Did you receive wages for your services as president
3 while you were at Spirit Construction?

4 A Yes.

5 MR. PETITJEAN: Counsel, let's move
6 forward. The question is whether he's receiving wages
7 now from Spirit Construction or is employed by Spirit
8 Construction.

9 Q And are you an employee of Spirit Construction?

10 A I do not receive wages there.

11 Q And are you employed by Spirit Construction?

12 A I do not receive wages there.

13 Q Do you receive--

14 A I do receive health benefits, and I've testified to
15 that before.

16 Q Do you receive any wages from Tissue Technology?

17 A No.

18 Q How about EARTH? Do you receive any wages from EARTH?

19 A No.

20 (Exhibit A marked.)

21 Q Mr. Van Den Heuvel, you've been provided with what's
22 marked as Exhibit A. It's a patent application,
23 publication number US 2012/0204483 A1. Do you see the
24 document?

25 A Yes.

1 Q Do you recognize this document?

2 A Yes.

3 Q Is this the patent application you referenced in your
4 prior testimony?

5 A It is the original. It's changed since then, but it is
6 the original.

7 Q Is this the process that you contemplate being put into
8 place at Green Box?

9 MR. PETITJEAN: Counsel, I'll object.

10 We're far-fetched from asset and liability. You're
11 asking a question about operations.

12 Q Do you have any arrangements in place to receive any
13 royalties as a result of this process?

14 MR. PETITJEAN: That's-- Ron, you
15 personally is the question.

16 A No, not at this present time. It's still in
17 application form.

18 Q Are you party to any contracts which relate to the
19 licensing of this technology?

20 A Not currently.

21 Q You said, "Not currently." Were you in the past?

22 A No. I will be in the future.

23 Q And what's the basis of that belief?

24 A Agreements that are coming through. I don't have
25 anything now, and I can't do it when the patent is in

1 application form so--

2 Q So today you believe you have no contractual rights to

3 any royalty as--as that would relate to the use of this

4 technology reflected in the application?

5 A Correct.

6 Q The application states that there is an assignee of PC

7 Fibre Technology, LLC. Do you see that on the front

8 page?

9 A I do.

10 Q Did you then assign this to that entity?

11 A It's the intention to when it's finalized.

12 Q And do you have any form of contract then with PC Fibre

13 Technology, LLC?

14 A Not in place now, no.

15 Q Do you have any ownership interest in PC Fibre

16 Technology, LLC?

17 A I will when the patent is put in.

18 Q How do you know that?

19 A I just will. I'm not going to get any shares from the

20 company until I put the patent in.

21 Q Is PC Fibre Technology, LLC, a company you formed?

22 A Yes.

23 Q Then are you a member of PC Fibre Technology, LLC?

24 A Yes.

25 MR. PETITJEAN: Ron, do you understand

1 what he means by being a member? Before you said you
2 don't have any shares of it.

3 THE WITNESS: Member are different than
4 shares. LLCs don't have shares. They issue units.

5 MR. PETITJEAN: So are you--are you the
6 owner of PC Fibre Technology?

7 THE WITNESS: I own some units. That's
8 correct.

9 Q Do you know how many units you own?

10 A Not presently.

11 Q Do you know whether anyone else owns any units of this
12 entity?

13 A I know they do.

14 Q Do you know who that is?

15 A No.

16 (Exhibit B marked.)

17 Q Mr. Van Den Heuvel, you've been provided with what's
18 been marked as Exhibit B. Have you ever seen this
19 document before?

20 A Yes.

21 Q Did you prepare this document?

22 A I didn't prepare it, no.

23 Q Do you know who did prepare the document?

24 A Looks like it came off of our mass system. I believe
25 it would be prepared by our computer system.

1 Q But you don't know who would have been operating the
2 system to prepare this?
3 A Not at this time. There's seven people that enter
4 data.
5 Q And who are those seven people?
6 A I wouldn't know who did it back in '13.
7 Q Who is it today?
8 A Today it would be Tami.
9 Q Is that Tami Phillips?
10 A Yes.
11 Q Now, this document purports to be a summary balance
12 sheet as of December 31, 2013, for Green Box NA Green
13 Bay, LLC. Did I get that right?
14 A Yes.
15 Q There's a section here on patents and intellectual
16 property. It begins on the first page. Do you see
17 that?
18 A Yes.
19 Q And then there are a number of different entries on
20 that first page going onto the second page. One of
21 them says trademarks. Do you see that on the first
22 page?
23 A Yep.
24 Q There's an entry for royalty licensing agreements--GB
25 NA/GB INT I&II for \$15 million. Do you see that?

1 A Yes, I do.

2 Q Do any of these entries on either of these pages for
3 intellectual property reflect, for example, this
4 intellectual property reflected in your patent
5 application, Exhibit A?

6 A Has to do with international patents. Now, that patent
7 is a U.S. patent.

8 MR. PETITJEAN: What patent are you
9 talking about, Ron?

10 THE WITNESS: The patent he showed me--

11 MR. PETITJEAN: Right here--

12 THE WITNESS: --in--

13 MR. PETITJEAN: --Exhibit A?

14 THE WITNESS: --Exhibit A is a United
15 States application. This valuation, it's
16 international.

17 MR. PETITJEAN: So the answer is no?

18 THE WITNESS: The answer is no.

19 Q Do you hold any international patents?

20 MR. PETITJEAN: Do you personally hold any
21 international patents?

22 A No.

23 Q Mr. Van Den Heuvel, did you provide any of the
24 information that went into the preparation of this
25 document, this Exhibit B?

1 A I'm sure I was asked questions on it. I wouldn't be
2 able to tell what, though.

3 MR. PETITJEAN: So you don't know.

4 THE WITNESS: I don't know.

5 Q Does this document reflect any liability of Green Box
6 NA Green Bay, LLC, to you individually?

7 MR. PETITJEAN: If you can answer that,
8 Ron.

9 Counsel, we all agree Mr. Van Den Heuvel is not
10 indicated as a--a liability on the last page.

11 Q Well, let's look at that last page. Under long-term
12 liabilities there's an entry for RVDH sub debt,
13 installment, and it's \$46,817,870.97. Do you see that
14 entry?

15 A Yes, I do.

16 Q As you see that, does that, in your mind, as you sit
17 here today, reflect anything you think you're owed
18 individually by Green Box?

19 A RVDH would not be-- It would be RVDH Development.
20 Wouldn't be me.

21 Q So you think that's a reference to RVDH Development
22 Corp.?

23 A It's money owed to VHC that's in here through RVDH
24 Development. Correct.

25 Q You said money owed to VHC, Inc., through RVDH

1 Development Corp.?

2 A Before--before you asked me about the \$74 million owed.

3 This is part of that. You can see it right there. A

4 lot of money owed.

5 Q I agree. And what, again, is your interest in RVDH

6 Development Corp.?

7 A Forty-some percent. I said that in my testimony--

8 Q Sure.

9 A --last time.

10 Q And, now, that includes you and your wife?

11 A Correct.

12 Q On the first page, if you could flip back to page one,

13 there's an entry, the second entry under assets,

14 working capital cash Patriot. Do you see that?

15 A Yes, I do.

16 Q Do you have any knowledge of what that amount

17 constitutes?

18 A Green Box NA Green Bay borrowed Patriot and put cash

19 into their working capital. I'd have no clue what the

20 balance is today.

21 Q And is that Patriot Tissue, LLC?

22 A Yes.

23 Q And I think you testified last time we met that you do

24 have an interest in Patriot Tissue, LLC, correct?

25 A I do not.

1 Q Do any entities in which you hold an interest have an
2 interest in Patriot Tissue, LLC?
3 A It's owned by PCDI, and I own interest in PCDI Corp.
4 Q So do you know whether Green Box NA Green Bay, LLC,
5 owes anything to Patriot Tissue?
6 A Currently, I wouldn't know.
7 Q Same question, other way around. Do you know whether
8 Patriot Tissue, LLC, owes Green Box--
9 A I do not know.
10 (Exhibit C marked.)
11 Q Mr. Van Den Heuvel, you've been handed what's been
12 marked as Exhibit C. It's a one-page document. At the
13 top it says "Marco Araujo Deposit." Do you see that?
14 A I do.
15 Q Do you recognize this document?
16 A Nope.
17 Q Never seen it before?
18 A I don't remember seeing it before.
19 MR. PETITJEAN: We spent great time on
20 this document with prior testimony with Mr. Reinhart.
21 Q Is it fair to say you didn't prepare this then, this
22 document?
23 A I didn't prepare it. I don't even type.
24 Q So you don't--you don't know how to type?
25 A No, I don't.

1 Q Have you ever entered any information into any computer
2 system relating to Green Box Green Bay's finances?

3 A Never.

4 Q Same question relating to your finances. Have you ever
5 entered any--any information into any computer?

6 MR. PETITJEAN: Counsel, assets and
7 liabilities. Let's move on.

8 Q Mr. Van Den Heuvel, you stated in our prior session
9 that you hadn't received any W-2 forms for the 2012 tax
10 year. Do you remember saying that?

11 A Yes.

12 Q I don't think I asked you this, but did you get any
13 1099 forms?

14 A I did get 1099s.

15 Q And what were those for again?

16 A I have--

17 MR. PETITJEAN: If you-- Do you know?

18 A I have over \$20 million, and it's for debt forgiveness.

19 Q Forgiven by whom? Do you know?

20 A I would not know here today, no.

21 Q And that's for 2012?

22 MR. PETITJEAN: Are you sure it was for
23 2012?

24 A Oh. I'm sorry. Just that year?

25 Q Specifically that year. I'll ask about other years.

1 A I wouldn't know.

2 Q Okay.

3 A I wouldn't know.

4 Q You testified earlier that you have some minor
5 children; is that right?

6 A Yes.

7 Q How many minor children do you have again?

8 A A 12-year-old and a 10-year-old.

9 Q Okay. And are they in school?

10 A Yes.

11 Q And where do they go to school?

12 A Our Lady of Lourdes. It's a catholic school in
13 De Pere, Wisconsin.

14 Q And do you pay the tuition for them to attend that
15 school?

16 MR. PETITJEAN: Assets and liabilities,
17 Counsel.

18 Q Do you owe the school any tuition for your children?

19 A No.

20 MR. PETITJEAN: Current.

21 A Currently, no.

22 Q When's the last time you paid their tuition?

23 MR. PETITJEAN: Assets and liabilities.
24 He indicated he doesn't owe the school any money.

25 Q Mr. Van Den Heuvel, do you know--do you know a Marie

1 Sumnicht?

2 A Yes.

3 Q Who is that?

4 A She's a--

5 MR. PETITJEAN: Assets--

6 A --teacher.

7 MR. PETITJEAN: --and liabilities. Tell
8 me some relevance.

9 MR. SMIES: Yeah.

10 Q Do you owe Ms. Sumnicht anything?

11 A No.

12 Q Have you paid her any money in the last five months?

13 MR. PETITJEAN: Tell me some relevance to
14 assets and liabilities.

15 Do you owe her any money?

16 THE WITNESS: No.

17 Q Do you have a contract with her?

18 A Not presently.

19 Q Have you in the past?

20 MR. PETITJEAN: Tell me how we're relating
21 to assets or liabilities or it's--it doesn't matter.

22 MR. SMIES: Well, he's contracted with
23 her--

24 MR. PETITJEAN: Does she owe you any
25 money?

1 THE WITNESS: She owes me no money.

2 Q Do you know a Pedro Gonzalez?

3 MR. PETITJEAN: Ron, I'm going to instruct

4 you not to answer, unless we get some relevance as to

5 the phonebook we're going through.

6 A I don't know him.

7 Q You don't owe him any money?

8 A I don't even know who he is.

9 Q Do you remember stating in your prior testimony when we

10 were last together that you didn't have any jewelry

11 that--in your house?

12 MR. PETITJEAN: That's not what he--that's

13 an inaccurate recollection--or, statement of what he

14 testified to.

15 Q Well, refresh my recollection. You said you had a

16 couple of watches, I think, that you--

17 MR. PETITJEAN: He said he has numerous

18 watches.

19 Q Numerous watches that you have?

20 A I said my total personal belongings were under \$24,000.

21 Q Have you purchased jewelry for your wife?

22 MR. PETITJEAN: He already testified to

23 that.

24 Q You don't recall saying you never purchased any jewelry

25 for your wife?

1 MR. PETITJEAN: That would be inaccurate,
2 also.
3 Q Do you owe Rummele's Jewelers any money for jewelry
4 purchases?
5 MR. PETITJEAN: It's Rummele's.
6 A Yes.
7 Q Rummele's.
8 A From 2004.
9 Q And what's the nature of that debt?
10 A Couldn't pay my bills. Still can't.
11 MR. PETITJEAN: Obviously, you don't buy
12 your wife enough jewelry there.
13 Q Just give me a second, please.
14 (Pause.) Can you tell me what the state of this
15 home you once owned in Savannah is? I think you said
16 it was foreclosed; is that right?
17 A I don't own it anymore.
18 Q Do you know who owns it?
19 A Yes.
20 Q Who's that?
21 A A law firm.
22 Q Do you owe that law firm money?
23 A I don't owe them anything.
24 Q I guess, I thought you said it was foreclosed.
25 Who--who had the mortgage which allowed them to

1 foreclose on your home in Savannah?

2 A I don't remember the name of the company. It was a
3 mortgage company.

4 Q Are you still in the process of paying that debt for
5 the home?

6 A No.

7 Q Do you know whether anyone's living in this home in
8 Savannah?

9 MR. PETITJEAN: Counsel, assets and
10 liabilities. He says he has no real estate in the
11 State of South Carolina that he owns.

12 MR. SMIES: Or Georgia--

13 MR. PETITJEAN: He's indicated--

14 MR. SMIES: --right?

15 MR. PETITJEAN: Or Georgia. Sorry.

16 There's a--you were just in that area of the country.
17 The state line runs very close.

18 Q Is this home in Savannah a part of any of your divorce
19 settlement with Jan Van Den Heuvel?

20 MR. PETITJEAN: Counsel, he's indicated
21 that he doesn't own any property, and now--we've now
22 covered both states of South Carolina and Georgia. And
23 he's also testified as to the money that he owes his
24 ex-wife.

25 Q Do you have any cash set aside to make payments on that

1 house in Savannah which you apparently don't own?

2 MR. PETITJEAN: He's already testified as
3 to the cash assets that he has in his previous
4 deposition when we were here.

5 Q Do you have any additional cash since the last time we
6 were here last week, other than the \$400 you used for
7 paying bills?

8 A None.

9 Q Since we last met, did you make arrangements to have
10 \$50,000 paid by today on that property in Savannah,
11 Georgia?

12 A I did not, no. Someone else may have, but I did not.

13 Q Did you ask anyone else to make those arrangements?

14 MR. PETITJEAN: Counsel, let's talk about
15 his assets, his liabilities.

16 Q I'm just--I'm just trying to understand this obligation
17 you have with your former spouse. Does it involve
18 paying for a property in Savannah, Georgia?

19 A You can see it in the divorce decree and in the
20 judgment.

21 MR. PETITJEAN: Does that set out all of
22 the obligations?

23 THE WITNESS: Yes.

24 MR. PETITJEAN: Is that in the--did you
25 get divorced, where, Brown County?

1 THE WITNESS: Brown County.

2 MR. PETITJEAN: And so it's in the Brown

3 County clerk of court's office?

4 THE WITNESS: That's where he's getting

5 these questions from.

6 MR. PETITJEAN: Oh.

7 Q Do you recall being in a hearing just few days ago

8 on--in the divorce case?

9 A Yes.

10 Q Do you recall stating you had plans to ensure that you

11 would get \$50,000 paid on that property by today, the

12 15th of May?

13 MR. PETITJEAN: Counsel, as to his assets

14 and his liabilities, he's already testified as to--that

15 he owes his wife--ex-wife money. And he's already

16 testified that he does not have \$50,000.

17 Q Do you know whether that's coming from one of these

18 friends or family members that are--

19 MR. PETITJEAN: Counsel, unless it's

20 a--unless you're talking about whether he has \$50,000,

21 I'm instructing him not to answer.

22 Q Mr. Van Den Heuvel, do you remember saying you made 74

23 millionaires in the Green Bay area?

24 A I made what?

25 Q Seventy-four millionaires in this area.

1 A Yes.

2 Q Who are some of those people?

3 MR. PETITJEAN: Counsel, unless it's--it
4 applies to Ron's assets or liabilities, we're just
5 going through the phonebook again.

6 MR. SMIES: Well, I think his prior
7 testimony was that it was these sorts of individuals
8 that felt indebted to Mr. Van Den Heuvel and
9 periodically offer him cash.

10 MR. PETITJEAN: Do any of those people owe
11 you money?

12 THE WITNESS: No.

13 MR. SMIES: Why don't we take maybe
14 ten minutes here for a break and regroup and see where
15 we're at.

16 (Recess.)

17 Q Mr. Van Den Heuvel, I just want to confirm that you
18 didn't bring any other documents with you today that
19 would be responsive to the order, other than the--you
20 originally provided your 2012 tax return, right?

21 A Correct.

22 Q But there aren't any other documents that you brought
23 with you today, right?

24 MR. PETITJEAN: No.

25 MR. SMIES: Fair enough.

1 And with that, I don't have anymore questions for
2 you today, so thank you for your time.

3 THE WITNESS: Thank you.

4 (Supplemental Exam concludes, 11:04 a.m.)
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STATE OF WISCONSIN))
) SS.
COUNTY OF BROWN)

I, Beth M. Goral, Court Reporter and Notary Public
in and for the state of Wisconsin, do hereby certify
that I have carefully compared the foregoing 31 pages
with my stenographic notes, and that the same is a true
and correct transcript.

I further certify that I am not a relative or employee or attorney or counsel of any of the parties, or a relative or employee of such attorney or counsel, or financially interested in said action.

Dated at Green Bay, Wisconsin, on this _____ day
of May 2015.

Beth M. Goral
Court Reporter
Notary Public

My commission expires January 1, 2017.