

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

UNITED STATES OF AMERICA,
Plaintiff,

v.

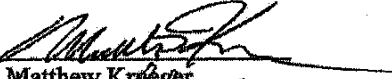
Case No. 16 CR 64

RONALD D. VAN DEN HEUVEL,
Defendant.

STIPULATION

It is hereby stipulated by and between the parties, through their respective counsel, after full consultation with and with the approval of the defendants, as follows:

1. That the defendants shall withdraw all motions challenging the July 2, 2015 searches filed in case No. 16-CR-64, subject to the provisions in paragraphs 2, 3, and 4.
2. That the government agrees not to use any evidence seized in the July 2, 2015 searches in its case in chief. However, such evidence can be used in cross-examination of the defendants consistent with applicable case law.
3. That the government agrees that the defendants can raise all search warrant issues in any other civil or criminal matters, that the defendants have preserved such issues and that the instant stipulation shall not constitute a waiver of such issues for other future litigation.
4. That the defendants cannot reassert a challenge to the issuance of the search warrants used to search on July 2, 2015 or their execution at any later time in case 16-CR-64.


Matthew Krueger

Aug. 29, 2017
Date


Mel Johnson

Aug. 29, 2017
Date


Andrew Porter

8/29/17
Date


Carrie DeLange

8/29/17
Date


Robert Lebell

8/30/17
Date