## 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 FOR RETURN OF PROPERTY

COMES NOW the above named defendant, by his attorney, Robert G. LeBell, and moves the court for an order pursuant to F.R.Crim.P. 41(g) and 12 to return property seized from the moveant and/or his business entities. The defendant respectfully requests an evidentiary hearing which will require approximately three hours of court time.

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, WI 53202 (414) 276-1233