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 TO VACATE PLEA

COMES NOW the above named defendant, Ronald Van Den Heuvel, through Attorney Robert LeBell, and moves the court to vacate his plea of guilty in the above captioned matter pursuant to Fed. R. Crim. P. 32(d) and Fed. R. Crim. P. 11(d)(2).

AS GROUNDS THEREFORE the defendant relies upon the attached memorandum.

Dated at Milwaukee, Wisconsin this 2nd day of January, 2018.

Respectfully submitted,

/s/ Robert G. LeBell

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