

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

UNITED STATES OF AMERICA,

Plaintiff,

v.

Case Nos. 16-CR-64 and 17-CR-160

RONALD H. VAN DEN HEUVEL,

Defendant.

**UNITED STATES' MOTION FOR REVOCATION OR
MODIFICATION OF RELEASE ORDER**

The United States of America, by and through its attorney, Matthew D. Krueger, United States Attorney for the Eastern District of Wisconsin, respectfully moves the Court to revoke its order releasing defendant Ronald Van Den Heuvel and to order detention pending appeal in Case No. 16-CR-64 and trial in Case No. 17-CR-160. In the alternative, the United States respectfully moves the Court to modify its release order to impose additional conditions of release.

BACKGROUND

Van Den Heuvel has been under court supervision since April 2016 when he was indicted for bank fraud in Case No. 16-CR-64. In that case, Van Den Heuvel was convicted of conspiracy to commit bank fraud in violation of 18 U.S.C. § 371. In advance of the sentencing, Van Den Heuvel moved to withdraw his guilty plea. 16-CR-64, Doc. 171. The Court denied that motion and sentenced Van Den Heuvel to three years of imprisonment on January 5, 2018. 16-CR-64, Doc. 184. The Court ordered Van Den Heuvel to pay restitution of \$316,445.47 to Horicon Bank, which to date he has not paid. *Id.*

In September 2017, Van Den Heuvel was indicted on wire fraud and money laundering charges in Case No. 17-CR-160. These charges allege that Van Den Heuvel pursued a scheme to defraud lenders and investors by making false representations about his “Green Box” business plan, and then used much of the lenders’ and investors’ funds for other purposes. 17-CR-160, Doc. 1. Trial is scheduled for November 13, 2018. 17-CR-160, Doc. 41.

Van Den Heuvel appealed his conviction in Case No. 16-CR-64. For the appeal, Van Den Heuvel obtained new, appointed counsel who has submitted three motions to extend the deadline to file the opening brief. *See* Case No. 18-1147, Doc. 12, 14, 16. The opening brief is currently due on August 9, 2018.

At sentencing in Case No. 16-CR-64, the Court ordered Van Den Heuvel to report to Bureau of Prisons (“BOP”) custody. But BOP subsequently declined to designate a report date until Van Den Heuvel’s pending charges are resolved. *See* 16-CR-64, Doc. 207. At a February 20, 2018 hearing, the Court decided to “take no action and allow the sentence to be essentially stayed pending the appeal and pending the resolution of the remaining criminal case so long as it does not appear there is unreasonable delay.” *Id.* Consistent with the plea agreement in Case No. 16-CR-64, the government did not object to Van Den Heuvel remaining out of custody to face the charges in Case No. 17-CR-160 for six months from sentencing. 16-CR-64, Doc. 151 ¶ 34. That the six-month period elapses on July 5, 2018.

In April 2018, the government presented information to the Court showing that Van Den Heuvel engaged in, and attempted to engage in, financial transactions that carried indicia of fraud. *See* 17-CR-160, Doc. 40. The Court conducted a bond hearing and imposed three additional conditions of release:

- “Defendant shall seek approval by U.S. Probation for any transactions involving \$500.00 or more, either personally or on behalf of his business entities.”
- “Defendant must provide full disclosure to any party he is attempting or soliciting to conduct business with that he” (a) was convicted of bank fraud and faces a 3-year sentence; (b) faces 14 additional counts of wire fraud and money laundering; and (c) has court-appointed counsel because he is indigent.
- “Defendant must submit monthly financial reports to Pretrial Services to include (a) any amount and source of monthly income received; (b) current assets and disposal of assets which are in his name, or over which he has control or is able to convey; (c) provide copies of account statements from any bank or financial institution held in his name or over which he has control.”

17-CR-160, Doc. 42.

On June 18, 2018, the United States provided information to Pretrial Services regarding Van Den Heuvel’s activities that appear to violate his release conditions. This information is summarized below and in Docket No. 46’s Release Status Report. In recent days, the United States has obtained further information, which is being presented here directly to the Court so that it can be considered at the upcoming July 6, 2018 hearing. The underlying records and reports of interview related to this additional information are being submitted to defense counsel by email today.

A. Payments to Oneida Country Club

On May 11, 2018, Van Den Heuvel paid \$3,500 in cash to Oneida Golf and Country Club (“Oneida Country Club”) without Pretrial Services’ approval. *See* Doc. 46. According to the Oneida employee who received the payment, Van Den Heuvel remarked that the Court had lifted restrictions on his bank accounts, and that his wife Kelly was the signer on the accounts and could use funds without repercussions, making it easier for Van Den Heuvel to obtain cash. Van Den Heuvel also paid an additional \$14,781 to Oneida Country Club between September 20, 2017 and February 23, 2018, and incurred charges of \$2,3228.59 during May 2018. *Id.*

When questioned by Pretrial Services, Van Den Heuvel claimed the \$3,500 cash payment came from Tissue Technology because the Oneida Country Club membership was used for business purposes. 17-CR-160, Doc. 46. But the release condition requires Pretrial Services' approval not only for personal transactions but also transactions done for Van Den Heuvel's businesses. Moreover, his claim of business purposes is doubtful. 17-CR-160, Doc. 42. Records from Oneida Country Club show numerous charges for pro shop purchases, lessons, and meals for Van Den Heuvel's wife and family. These include a charge of \$915.60 on September 14, 2017, for new golf clubs and a charge of \$834.51 that Kelly Van Den Heuvel incurred on June 5, 2018, for new clubs for herself. *See* Ex. A (Oneida Country Club records for Sept. 2017); Ex. B (Email with Oneida Country Club and receipt for clubs in June 2018).

B. Transfer of Conversion Van Without Pretrial Services' Approval

According to knowledgeable witnesses, Van Den Heuvel had control of a 2005 Chevrolet conversion van that was titled in Kelly Van Den Heuvel's name. Until recently, Van Den Heuvel permitted employees of Patriot Tissue in De Pere, Wisconsin, to use the van. Van Den Heuvel recently transferred the title and keys to the van to an individual named T.H. who had come to own equipment known as after-dryers that Van Den Heuvel was seeking to purchase. T.H.'s understanding was that the van was worth \$2,500. A records search corroborated that, on June 8, 2018, registration of the van was changed from Kelly Van Den Heuvel to the girlfriend of T.H. U.S. Probation Officer Brian Koehler states that Van Den Heuvel did not seek approval from Pretrial Services before transferring the van.

C. Failure to Provide Complete Monthly Financial Reports

U.S. Probation Officer Brian Koehler reports that in late June 2018, Van Den Heuvel submitted documentation as his required monthly financial report. According to Mr. Koehler, Van Den Heuvel did not submit any account statements from any bank or financial institution.

This omission is concerning because Van Den Heuvel appears to keep bank accounts and assets out of his name to avoid detection. First, the government's investigation has found numerous bank accounts that Van Den Heuvel controlled but titled in the names of entities or other individuals, often with his wife Kelly Van Den Heuvel having signatory authority. Second, as noted, Van Den Heuvel told the Oneida Country Club employee said that because Kelly was the signer on his bank accounts, she could use funds without repercussions, and he could obtain cash. Third, according to another Oneida Country Club employee, Kelly Van Den Heuvel recently asked to set up an automatic payment of the family's account from their son's trust account. (Oneida Country Club denied the request; the government does not have information about the son's trust account.) Fourth, as noted, the 2005 Chevrolet conversion van was titled in Kelly Van Den Heuvel's name, even though Van Den Heuvel allowed it to be used primarily for Patriot Tissue employees.

This pattern suggests that Van Den Heuvel is likely using bank accounts in others' names without disclosing the accounts to Pretrial Services. It seems highly implausible that the Van Den Heuvels could maintain their high-end lifestyle without using any bank accounts.

D. Additional Attempts to Sell Kool Machine

The government recently learned that Van Den Heuvel attempted to persuade a company located in Boise, Idaho—referred to herein as Company A—to purchase a pyrolysis machine

manufactured by Kool Manufacturing.¹ Van Den Heuvel had purchased the Kool machine with funds from victim Clifton Equities and EB-5 investors, as well as other entities. 17-CR-160, Doc. 40, at 3-4. The Kool machine remains in a warehouse in De Pere, Wisconsin, today. Those victims and other creditors have claims against the Kool machine, which became subject to the Green Box NA Green Bay bankruptcy case. *Id.* Despite those claims, from early 2016 through as recently as June 26, 2018, Van Den Heuvel periodically contacted Company A in attempts to persuade Company A to purchase the Kool machine.

E. Inappropriate Contacts with Witnesses

In recent weeks, Van Den Heuvel has contacted individuals after learning that they made statements to investigating agents. In several cases, Van Den Heuvel apparently had no legitimate reason to contact the witnesses but rather made the contact for the purpose of conveying his awareness of their cooperation with law enforcement.

First, on June 18, 2018, the United States submitted to Pretrial Services the report of interview of Oneida Country Club employee M.J. The United States also provided Van Den Heuvel's counsel with a copy of the report. That same day, Van Den Heuvel called M.J. to "thank" her and express apologies for her having to speak with the investigative agent, whom he described as an "asshole."

Second, that same day, June 18, 2018, Van Den Heuvel sent a text message to a witness (Ma.K.) whose statement had been disclosed to Van Den Heuvel in discovery. They spoke by phone the next day and Van Den Heuvel claimed he had nearly closed a deal and would be able

¹ Per the company's request, to protect its reputation, the government is not listing the company's name in this filing but is providing discovery to Van Den Heuvel.

to repay Ma.K. soon. Van Den Heuvel also added that he had read Ma.K.'s "testimony" and was "not mad" at Ma.K. or his partner, who had also made a statement to investigators.

Third, also on June 18, 2018, Van Den Heuvel called B.G., who previously worked for Van Den Heuvel at a sorting and pulping facility. Van Den Heuvel claimed he called to relay that he planned to purchase the facility. But then Van Den Heuvel went on to say he got a "cute note" from the FBI, which reflected that B.G. had used his own money to pay for business expenses at Van Den Heuvel's request. This apparently referred to a statement that Van Den Heuvel read in a report of interview that B.G. had given.

Fourth, in April 2018, very shortly after receiving information in discovery about A.K.'s cooperation with the government, Van Den Heuvel called A.K. According to A.K., Van Den Heuvel screamed and cursed at him because A.K. had forwarded an email from Van Den Heuvel to the government.

DISCUSSION

I. Van Den Heuvel Should Be Detained for Violating Conditions of Release Pursuant to 18 U.S.C. § 3148(b)

The consequences for violating a condition of release are governed by 18 U.S.C. § 3148(b), which provides that the Court "shall enter an order of revocation and detention if, after a hearing," the Court:

(1) finds that there is—

- (A) probable cause to believe that the person has committed a Federal, State, or local crime while on release; or
- (B) clear and convincing evidence that the person has violated any other condition of release; and

(2) finds that—

- (A) based on the factors set forth in section 3142(g) of [Title 18], there is no condition or combination of conditions of release that will assure that the person will not flee or pose a danger to the safety of any other person or the community; or

(B) the person is unlikely to abide by any condition or combination of conditions of release.

Thus, detention is required upon findings that (1) Van Den Heuvel either committed a crime or violated a condition of release, and (2) Van Den Heuvel poses a risk of flight or dangerousness, or is unlikely to comply with conditions of release. 18 U.S.C. § 3148(b). The government bears the burden of proof under § 3148(b).

A. Clear and Convincing Evidence Shows That Van Den Heuvel Violated Conditions of Release

The government has carried its burden under § 3148(b)(1)(B) because there is clear and convincing evidence that in at least two recent instances, Van Den Heuvel has violated the condition that he seek Pretrial Services' approval for financial transactions exceeding \$500. First, Van Den Heuvel admitted that he paid \$3,500 to Oneida Country Club on May 11, 2018, and the payment is corroborated by the associated business records. Van Den Heuvel's representation that the payment was a business expense is no defense because the release condition requires approval for business expenditures. 17-CR-160, Doc. 46. More importantly, his representation is false, as evidenced by the inherently personal nature of many of the expenses that led to the Oneida Country Club bills, such as new golf clubs.

Second, Van Den Heuvel did not obtain Pretrial Services' approval before transferring title of the 2005 Chevrolet van, which T.H. believed to be worth \$2,500. He may claim the transfer was not subject to Pretrial Services' approval because it was titled in Kelly Van Den Heuvel's name or because it was used for business purposes. But, again, the condition applies to business transactions and to any asset over which he has control, if not title. 17-CR-160, Doc. 46. Precisely because Van Den Heuvel routinely plays games with how he titles assets and comingles personal and business expenses, these violations are serious.

Third, as detailed above, Van Den Heuvel has not provided meaningful disclosure of his finances to Pretrial Services. He and his family must be using some bank accounts, but he has not disclosed any account records. It appears that the only financial records Van Den Heuvel has produced are records he generated himself. Given his bank fraud conviction and the pending charges in this case, the Court should be highly skeptical of records he produces. That is why obtaining records from third-party financial institutions is so important. The government's investigation has identified dozens of bank accounts opened by the Van Den Heuvels at numerous banks over the years. Because they switch accounts so frequently, however, Pretrial Services has no effective way to monitor Van Den Heuvel if he does not disclose his financial records. The three foregoing violations are supported by clear and convincing evidence.

B. There Is Probable Cause to Find that Van Den Heuvel Has Committed Additional Crimes While on Release

The government has also carried its burden under § 3148(b)(1)(A) because there is probable cause to find that Van Den Heuvel committed additional crimes while on release. The government incorporates here its April 3, 2018 Motion to Amend Conditions of Release (17-CR-160, Doc. 40) and summarizes below facts that constitute probable cause that Van Den Heuvel committed, or attempted to commit, wire fraud in violation of 18 U.S.C. § 1343, similar to conduct at issue in Case No. 17-CR-160.

1. Transactions with J.L.

From summer 2016 through early 2018, Van Den Heuvel negotiated with J.L., seeking funding for various projects and equipment. 17-CR-160, Doc. 40, at 2-4. Van Den Heuvel sent J.L. information that was false. *Id.* For example, Van Den Heuvel sent an "Executive Summary" of the "Great Lakes Tissue" project in Cheboygan, Michigan, claiming that \$7.7 million in "EB5 Funds were paid" for equipment in the project. Doc. 40-1, Ex. A. In truth, Van

Den Heuvel received substantially less than \$7.7 million in EB-5 funds; moreover, most of the funds were *not* used for equipment for the Cheboygan, Michigan project. Doc. 40, at 3. Van Den Heuvel also sent a resume claiming that “Green Box has partnered with Cargill, Inc.,” Doc. 40-2, Ex. B, when in truth, Cargill never had an agreement with Green Box and had terminated its agreement with a different Van Den Heuvel-controlled entity back in 2013.

2. Attempts to Sell Kool Machine

In November 2017, Van Den Heuvel worked with J.L. in an attempt to sell the Kool machine that is in De Pere, Wisconsin. Doc. 40, at 3-4. As noted, the Kool machine is subject to claims by multiple victims and creditors. Van Den Heuvel nonetheless attempted to sell unit through J.L. and even attempted to charge \$5,000 for giving a demonstration of the Kool machine. *Id.* (As detailed above, Van Den Heuvel also attempted to sell the Kool machine to Company A without disclosing that his ownership of the Kool machine was, at best, clouded by numerous creditors’ claims.) Although the government is not aware of evidence showing that Van Den Heuvel ultimately received any funds from or through J.L., these facts amount to probable cause to find at least attempted wire fraud. That is, Van Den Heuvel made false and misleading representations regarding his business plans and the Kool machines in an attempt to induce payment of funds.

3. Transactions with A.K., Ma.K., and Mi.K.

Van Den Heuvel persuaded A.K. and Ma.K. of New York to make three loans, totaling \$87,500, sent through interstate wires, to Van Den Heuvel-controlled entities Cotton, Tissue Technology, Inc., and PCDI MI, from June 2017 through December 2017. Doc. 40, at 5. Among the collateral pledged by Van Den Heuvel for the loans were equipment known as after-dryers. *Id.* Yet, according to a knowledgeable witness, Van Den Heuvel no longer owned or

controlled the after-dryers. *Id.* These facts constitute probable cause that Van Den Heuvel committed wire fraud. He made fraudulent representations about the nature of the collateral supporting the loans in order to induce payments, which were sent by interstate wire transfer.

In addition, Van Den Heuvel sent Ma.K. and a broker named Mi.K. information in mid-2017 in an attempt to obtain further funding. *Id.* at 5. The information contained false information, including that Kelly Van Den Heuvel was the President of Tissue Technology, LLC and PCDI Michigan and had a net worth of \$29 million. *Id.* Van Den Heuvel also told Mi.K. that he had prevailed in a lawsuit against Sharad Tak when, in fact, Tak had prevailed in a federal suit against Van Den Heuvel. *Id.* The government has no information that indicates Van Den Heuvel successfully obtained funds through Mi.K., but Mi.K. relied on Van Den Heuvel to send misleading information to potential investors. *Id.* Although this scheme appears to have been less developed, it arguably still constitutes attempted wire fraud.

C. Van Den Heuvel Is Unlikely to Abide by Conditions of Release

Given the evidence that Van Den Heuvel violated release conditions and committed additional crimes, detention is warranted on the ground that Van Den Heuvel is “unlikely to abide by any condition or combination of conditions of release.” 18 U.S.C. § 3148(b)(2)(B). Van Den Heuvel has demonstrated his inability to comply with even simple conditions of release, such as seeking Pretrial Services’ approval for financial transactions. The evidence suggest this inability flows from intractable dishonesty. Van Den Heuvel admitted to the Oneida Country Club employee that he has moved bank accounts out of his name to avoid detection. And when confronted with his Oneida Country Club payment, Van Den Heuvel obfuscated and lied to Pretrial Services. These patterns are longstanding with Van Den Heuvel, who was

convicted of defrauding Horicon Bank and now faces charges for another convoluted fraud scheme in Case No. 17-CR-160.

Van Den Heuvel has displayed no sign of stopping his fraudulent conduct. In addition to the post-indictment conduct described above, it bears mentioning that Van Den Heuvel presented information to Pretrial Services on March 23, 2018, regarding multiple additional financial transactions that he claimed to be pursuing. *See* Doc. 40, at 6-8. First, Van Den Heuvel proposed selling 5% of stock in Tissue Technology for \$5 million, even though he represented in his presentence report in Case No. 16-CR-64 that Tissue Technology shares were held in a trust controlled by other individuals, and that the stock had no ascertainable value. *Id.* at 7. Second, Van Den Heuvel proposed selling stock in Purely Cotton to Great Lakes Tissue in exchange for \$2 million in patent royalties, even though the owner of Great Lakes Tissue informed government agents that he had no intention of buying Purely Cotton stock, nor did he have reason to think Purely Cotton had any assets. *Id.* Third, Van Den Heuvel proposed selling stock in PCDI to a man in Ghana for \$6 million, even though Van Den Heuvel represented in his presentence report that PCDI shares were held in a trust controlled by others and had no ascertainable value. *Id.* at 8. Fourth, Van Den Heuvel proposed entering into a consulting agreement with Great Lakes Tissue and a royalty agreement with PC Fibre Box for intellectual property, even though, again, the ownership structure and value of any intellectual property is highly doubtful. *See id.* at 8-9.

The government does not yet have sufficient evidence to contend that these transactions amounted to wire fraud, but the proposed transactions remain highly questionable. What may be most striking about these are their sheer number. This reinforces the conclusion that Van Den

Heuvel is a persistent, unrepentant fraudster, even after being convicted of bank fraud and sentenced to three years of imprisonment.

In sum, the Court cannot find that Van Den Heuvel would comply with new release conditions. The defense will likely propose home confinement or restrictions on Van Den Heuvel's ability to communicate with witnesses or engage in financial transactions. His track-record, however, provides no basis to believe he would comply with those conditions. In addition, the burden on Pretrial Services to try to monitor his compliance would be unreasonable.

D. No Conditions Can Assure that Van Den Heuvel Will Not Flee or Pose a Danger to Others' Safety

In addition, the Court can find that detention is required because, based upon the factors set forth in § 3142(g), no condition or combination of conditions will assure that Van Den Heuvel will not flee or pose a danger to the safety of another person or the community. *See* 18 U.S.C. § 3148(b)(2).

The nature and circumstance of the offense charged, although not a violent crime, is very serious, with fraud loss amounts exceeding \$9 million. If convicted of the whole scheme, Van Den Heuvel would be exposed to the potential of lengthy incarceration. This creates an increased likelihood of flight and of Van Den Heuvel engaging in extreme actions, as he has already shown a willingness to contact witnesses inappropriately.

The second § 3142(g) factor is the weight of the evidence. The United States proffers that the evidence is very strong. Numerous witnesses, both victims and individuals who worked with Van Den Heuvel, will testify that Van Den Heuvel made false representations about the Green Box process and how lenders and investors' funds would be used. Representations about how the funds would be used were also reduced to writing in agreements. Financial records and receipts of expenditures show, in concrete and undisputable fashion, how Van Den Heuvel

quickly diverted huge sums of investors' and lenders' funds to unauthorized purposes to fuel his lavish lifestyle. This overwhelming evidence increases the risk that Van Den Heuvel will flee or act dangerously towards others.

Next, the history and characteristics of Van Den Heuvel are mixed. Without question, Van Den Heuvel has deep family ties and a long history in the community, and he has appeared consistently at court hearings in these two cases. At the same time, Van Den Heuvel has demonstrated increasingly erratic behavior, as shown by his inappropriate contacts with witnesses. Further, Van Den Heuvel is relatively sophisticated and well-traveled with an uncanny ability to persuade people to lend him large sums of money. His wife and children recently visited the Cayman Islands. Doc. 46. As the trial in this case approaches and Van Den Heuvel runs out of ways to delay incarceration, there is a significant risk that he may seek to flee.

Finally, the Court must assess the nature and seriousness of the danger to any person or the community if Van Den Heuvel remained released. 18 U.S.C. § 3142(g)(4). Van Den Heuvel's persistent track record of fraudulent conduct creates a real risk that he will continue to seek to defraud others around him, pressuring people to loan funds and invest in his fraudulent business plans. In addition, although Van Den Heuvel does not have a criminal history of violence, witnesses have stated that Van Den Heuvel can become verbally aggressive and that he physically assaulted one witness. Specifically in August 2011, former business partner H.B. confronted Van Den Heuvel regarding his fraudulent misuse of funds, and Van Den Heuvel responded by punching H.B. in the head. H.B. states that he took himself to a hospital afterwards and was diagnosed with a concussion. More recently, Van Den Heuvel was verbally abusive towards A.K., and he has engaged in subtle intimidation of witnesses in recent contacts.

Taken together, the Court could also base detention on the finding that no condition or combination of conditions will assure that Van Den Heuvel will not flee or pose a danger to the safety of another person or the community. 18 U.S.C. § 3148(b)(2).

II. Van Den Heuvel Should Be Detained Pending Appeal in Case No. 16-CR-64 Pursuant to 18 U.S.C. § 3143

The Court should also detain Van Den Heuvel pending appeal in Case No. 16-CR-64. Release or detention pending appeal is governed by 18 U.S.C. § 3143(b), which creates a presumption of detention unless the Court makes findings that support release. The Court has not expressly make such findings in deciding whether to permit Van Den Heuvel to remain released. Section 3143(b)(1) provides that the Court “shall order that a person who has been found guilty of an offense and sentenced to a term of imprisonment, and who has filed an appeal . . . , be detained,” unless the Court finds:

(A) by clear and convincing evidence that the person is not likely to flee or pose a danger to the safety of any other person or the community if released under section 3142(b) or (c) of this title; and

(B) that the appeal is not for the purpose of delay and raises a substantial question of law or fact likely to result in—

- (i) reversal,
- (ii) an order for a new trial,
- (iii) a sentence that does not include a term of imprisonment, or
- (iv) a reduced sentence to a term of imprisonment less than the total of the time already served plus the expected duration of the appeal process.

18 U.S.C. § 3143(b)(1). The burden to show, by clear and convincing evidence, that the requirements for release have been met lies with Van Den Heuvel. *See United States v. Bilanzich*, 771 F.2d 292, 298 (7th Cir. 1985) (holding that § 3143 “requires the defendant, not the government, to shoulder ‘the burden of showing the merit of the appeal’”); *see also, e.g., United States v. Hanhardt*, 173 F. Supp. 2d 801, 805 (N.D. Ill. 2001) (holding that the defendant

bears the burden of proof on each element of § 3143, citing *United States v. Holzer*, 848 F.2d 822, 824 (7th Cir. 1988)).

Thus, to avoid detention pending appeal, Van Den Heuvel must show both that he is unlikely to flee or cause danger to others, and also that his appeal raises a substantial question of law or fact. The above discussion of the § 3142(g) factors shows why Van Den Heuvel cannot show that he is unlikely to flee, given the significant incarceration he faces, his ability to access funds, and his familiarity with international travel. Nor can he show he is unlikely to be dangerous to others, given his persistent fraud schemes and aggressive behavior to individuals who have been confronted him and cooperated with the government.

Van Den Heuvel also cannot carry his burden regarding the merits of his appeal. Although his opening brief has not yet been filed, it is anticipated that Van Den Heuvel will challenge the denial of his motion to withdraw his plea. The Court issued a detailed, thorough written order on that issue, and there is no apparent question of law or fact, let alone a substantial one by which Van Den Heuvel could carry his burden under § 3143(b). 16-CR-64, Doc. 183. Accordingly, detention under § 3143(b) is required.

Detention under this provision makes sense for the additional reason that the Court had ordered at sentencing that Van Den Heuvel should report to BOP custody. Given Van Den Heuvel's disregard for his conditions of release, it is appropriate for the Court to follow through with its initial plan of having him begin to serve his sentence in Case No. 16-CR-64.

Defense counsel may contend that detention will prevent Van Den Heuvel from being able to prepare for trial in Case No. 17-CR-160, given the complexity of the case and volume of discovery. Without meaning to minimize the difficulty of preparing for trial while detained, numerous defendants must do so. Working with the U.S. Marshals Service, the Court is likely

able to ensure that the Brown County officials provide Van Den Heuvel with reasonable access to counsel and discovery. To date, he has had well over six months to review discovery and confer with counsel, which is far more than many defendants receive.

III. In the Alternative, the Court Should Modify the Conditions of Release

In the alternative that the Court decides not to detain Van Den Heuvel, the Court should modify the release conditions to require Van Den Heuvel to provide meaningful financial information and to limit Van Den Heuvel's ability to contact witnesses or pursue business plans. Specifically, the government would recommend these additional conditions:

- (a) home confinement with GPS monitoring;
- (b) a prohibition on communicating in any manner with potential witnesses in this case; and
- (c) a prohibition on soliciting, proposing, or considering any transactions that involved any business investments or loans or transfer or leases of equipment, including but not limited to any transactions related to any pyrolysis units (a/k/a Kool Units) or after-dryers.

Additionally, if the Court does not order Van Den Heuvel detained or subject to home confinement, the United States respectfully requests that Van Den Heuvel be required to seek full-time employment with an employer that would pay him wages, subject to approval of Pretrial Services. Theoretically, working full-time for wages would limit the amount of time that Van Den Heuvel could spend trying to pursue new fraud schemes and would help Van Den Heuvel earn legitimate wages for the payment of restitution and the reimbursement of appointed counsel fees.

CONCLUSION

For the reasons stated above, the United States respectfully requests that Van Den Heuvel be detained pending trial in Case No. 17-CR-160 and appeal in Case No. 16-CR-64. In the

alternative, the United States respectfully requests that the conditions of Van Den Heuvel's release be modified as described above.

Dated this 3rd day of July, 2018 at Milwaukee, Wisconsin.

Respectfully submitted,

/s/ Matthew D. Krueger

MATTHEW D. KRUEGER
United States Attorney
Eastern District of Wisconsin
517 East Wisconsin Avenue, Room 530
Milwaukee, WI 53202
(414) 297-1700 (phone)
(414) 297-1738 (fax)
E-Mail: matthew.krueger@usdoj.gov



Oneida Golf & Country Club

PO Box 10736
Green Bay WI 54307-0736
www.oneidagcc.com

Statement

MR RONALD VANDEN HEUVEL
2303 LOST DAUPHIN
DE PERE WI 54115

00483	Sep 30/17
MEMBER	DATE

AMOUNT PAID \$ 4,538.04

PLEASE DETACH AND RETURN TOP PORTION WITH PAYMENT

DATE	REF.NO	DESCRIPTION	AMOUNT	SVC/GRAT	TAX	TOTAL
Sep 21/17	100697	DINING	24.75	4.95	1.49	31.19
Sep 24/17	196183	CART RENTAL	20.00	0.00	1.00	21.00
Sep 24/17	196186	PRO SHOP	7.00	0.00	0.35	7.35
Sep 24/17	101059	DINING	22.00	10.40	1.32	33.72
Sep 24/17	101060	DINING	25.00	12.00	1.50	38.50
Sep 26/17	196256	PRO SHOP	154.50	0.00	7.73	162.23
Sep 26/17	101093	DINING	98.25	44.85	5.90	149.00
Sep 26/17	101094	DINING	33.00	16.60	1.98	51.58
Sep 27/17	196276	LESSONS	20.00	0.00	0.00	20.00
Sep 29/17	101327	DINING	105.50	28.17	6.33	140.00
Sep 29/17	101335	DINING	20.00	4.00	1.20	25.20
Sep 30/17		GOLF CAPITAL DUES	100.00	0.00	5.00	105.00
Sep 30/17		GOLF DUES	730.00	0.00	36.50	766.50
Sep 30/17	196553	PRO SHOP	150.50	0.00	7.53	158.03
Sep 30/17	196574	LESSONS	20.00	0.00	0.00	20.00
Sep 30/17	196578	PRO SHOP	160.00	0.00	8.00	168.00
Sep 30/17	101389	DINING	12.00	7.40	0.72	20.12
Sep 30/17	101390	DINING	22.00	12.40	1.32	35.72
Sep 30/17	101393	DINING	7.00	5.40	0.42	12.82
-PLEASE CONTACT MARY ELLEN JOHNSON TO FIND OUT MORE ABOUT A PAY IN ADVANCE CREDIT OR OTHER PAYMENT OPTIONS -BALANCE IS DUE AND PAYABLE ON THE 15TH OF THE MONTH -YOUR STATEMENT MAY ALSO BE VIEWED ONLINE AT ONEIDAGCC.COM						
Minimum Billing Period Sep 1/17 - Nov 30/17			3,976.50	396.16	202.77	4,538.04

PERIOD MINIMUM 350.00

MINIMUM REMAINING 0.00

00483	4,538.04	0.00	0.00	0.00	4,538.04
MEMBER	CURRENT BAL.	30 DAYS BAL.	60 DAYS BAL.	90 DAYS BAL.	AMOUNT DUE



Oneida Golf & Country Club

PO Box 10736
Green Bay WI 54307-0736
www.oneidagcc.com

Statement

MR RONALD VANDEN HEUVEL
2303 LOST DAUPHIN
DE PERE WI 54115

00483	Sep 30/17
MEMBER	DATE

AMOUNT PAID \$ 4,538.04

PLEASE DETACH AND RETURN TOP PORTION WITH PAYMENT

DATE	REF.NO	DESCRIPTION	AMOUNT	SVC/GRAT	TAX	TOTAL
		Balance Forward				1,832.61
Sep 3/17	194924	CART RENTAL	40.00	0.00	2.00	42.00
Sep 3/17	194924	GREEN FEES	95.00	0.00	4.75	99.75
Sep 3/17	194925	PRO SHOP	46.00	0.00	2.30	48.30
Sep 3/17	194925	CART RENTAL	40.00	0.00	2.00	42.00
Sep 3/17	194925	GREEN FEES	190.00	0.00	9.50	199.50
Sep 3/17	194947	CART RENTAL	30.00	0.00	1.50	31.50
Sep 3/17	194958	PRO SHOP	110.00	0.00	5.50	115.50
Sep 3/17	099838	DINING	26.00	15.20	1.56	42.76
Sep 3/17	099839	DINING	20.75	14.15	1.25	36.15
Sep 3/17	099850	DINING	14.00	2.80	0.84	17.64
Sep 3/17	099851	DINING	45.00	22.30	2.70	70.00
Sep 3/17	007586	BEV CART	14.75	2.95	0.89	18.59
Sep 4/17	195007	CART RENTAL	40.00	0.00	2.00	42.00
Sep 4/17	195007	GREEN FEES	95.00	0.00	4.75	99.75
Sep 4/17	099875	DINING	28.00	10.38	1.62	40.00
Sep 4/17	088322	CABANA	62.50	32.50	3.75	98.75
Sep 4/17	007630	BEV CART	12.75	2.55	0.77	16.07
Sep 6/17	009953	Banquet	120.00	49.00	5.70	174.70
Sep 6/17	009969	Banquet	4.00	2.80	0.24	7.04
Sep 6/17	009953	Item Discount				-30.00
Sep 9/17	100210	DINING	115.50	53.10	6.93	175.53
Sep 9/17	100212	DINING	34.00	16.80	2.04	52.84
Sep 14/17	195519	PRO SHOP	872.00	0.00	43.60	915.60
Sep 17/17	195769	PRO SHOP	70.00	0.00	3.50	73.50
Sep 17/17	195773	LESSONS	20.00	0.00	0.00	20.00
Sep 17/17	100662	DINING	79.75	25.46	4.79	110.00
Sep 20/17	CASH	Payment Received - Thank You				-1,840.00
Sep 21/17	195871	LESSONS	20.00	0.00	0.00	20.00
Continued ...						

MEMBER	CURRENT BAL	30 DAYS BAL.	60 DAYS BAL.	90 DAYS BAL.	AMOUNT DUE
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ONEIDA GOLF & COUNTRY CLUB

<p>ONEIDA GOLF & COUNTRY CLUB</p> <p>----- Chit Details -----</p> <p>Member: 00483 VANDEN HEUVEL, RONALD</p> <p>Server: Rick V</p> <p>Area: DINING</p> <p>Table#: 3</p> <p>Chit #: 02099838</p> <p>Date: Sep 3/17 Time: 1:02pm</p> <p>3 Fountain Soda 6.00</p> <p>2 Whitehaven Sauv. B 20.00</p> <p>-----</p> <p>Sub-Total: 26.00</p> <p>Service Charge 5.20</p> <p>Sales Tax 1.56</p> <p>-----</p> <p>Chit Total: \$32.76</p> <p>-----</p> <p>XTRA TIP \$10.00</p> <p>Quick Mem Charge \$42.76-</p>	<p>ONEIDA GOLF & COUNTRY CLUB</p> <p>----- Chit Details -----</p> <p>Member: 00483 VANDEN HEUVEL, RONALD</p> <p>Server: Cathy D</p> <p>Area: DINING</p> <p>Table#: Covers: 4</p> <p>Chit #: 02099851</p> <p>Date: Sep 3/17 Time: 1:08pm</p> <p>2 COBB SALAD 22.00</p> <p>1 REUBEN 12.00</p> <p>1 CLUB SAND 11.00</p> <p>-----</p> <p>Sub-Total: 45.00</p> <p>Service Charge 9.00</p> <p>Sales Tax 2.70</p> <p>-----</p> <p>Chit Total: \$56.70</p> <p>-----</p> <p>XTRA TIP \$13.30</p> <p>Member Charge \$70.00-</p>	<p>ONEIDA GOLF & COUNTRY CLUB</p> <p>----- Chit Details -----</p> <p>Member: 00483 VANDEN HEUVEL, RONALD</p> <p>Server: Jean K</p> <p>Area: DINING</p> <p>Table#: 1</p> <p>Chit #: 02100212</p> <p>Date: Sep 9/17 Time: 1:08pm</p> <p>3 Fountain Soda 6.00</p> <p>2 Rombauer Chardonna 28.00</p> <p>-----</p> <p>Sub-Total: 34.00</p> <p>Service Charge 6.80</p> <p>Sales Tax 2.04</p> <p>-----</p> <p>Chit Total: \$42.84</p> <p>-----</p> <p>XTRA TIP \$10.00</p> <p>Quick Mem Charge \$52.84-</p>
<p>ONEIDA GOLF & COUNTRY CLUB</p> <p>----- Chit Details -----</p> <p>Member: 00483 VANDEN HEUVEL, RONALD</p> <p>Server: Cathy D</p> <p>Area: DINING</p> <p>Table#: Covers: 2</p> <p>Chit #: 02099839</p> <p>Date: Sep 3/17 Time: 1:08pm</p> <p>1 LUNCH SPECIAL 14.00</p> <p>1 CHILD GR CHEESE 6.75</p> <p>-----</p> <p>Sub-Total: 20.75</p> <p>Service Charge 4.15</p> <p>Sales Tax 1.25</p> <p>-----</p> <p>Chit Total: \$26.15</p> <p>-----</p> <p>XTRA TIP \$10.00</p> <p>Member Charge \$36.15-</p>	<p>ONEIDA GOLF & COUNTRY CLUB</p> <p>----- Chit Details -----</p> <p>Member: 00483 VANDEN HEUVEL, RONALD</p> <p>Server: Stefanie B</p> <p>Area: DINING</p> <p>Table#: 1</p> <p>Chit #: 02099875</p> <p>Date: Sep 4/17 Time: 1:11pm</p> <p>2 Misc Item 6.00</p> <p>G. Chx</p> <p>Crisp Chx</p> <p>2 COBB SALAD 22.00</p> <p>-----</p> <p>Sub-Total: 28.00</p> <p>Service Charge 4.40</p> <p>Sales Tax 1.62</p> <p>-----</p> <p>Chit Total: \$34.02</p> <p>-----</p> <p>XTRA TIP \$5.98</p> <p>Quick Mem Charge \$40.00-</p>	<p>ONEIDA GOLF & COUNTRY CLUB</p> <p>----- Chit Details -----</p> <p>Member: 00483 VANDEN HEUVEL, RONALD</p> <p>Server: Michelle C</p> <p>Area: DINING</p> <p>Table#: 1</p> <p>Chit #: 02100662</p> <p>Date: Sep 17/17 Time: 1:10pm</p> <p>1 LUNCH SPECIAL 14.00</p> <p>2 Haymaker 14.00</p> <p>2 Fountain Soda 4.00</p> <p>1 Bottled Soda 2.75</p> <p>2 SHRIMP COCKTAIL 24.00</p> <p>1 CAESAR SALAD 11.00</p> <p>1 ONEIDA SALAD 10.00</p> <p>-----</p> <p>Sub-Total: 79.75</p> <p>Service Charge 15.95</p> <p>Sales Tax 4.79</p> <p>-----</p> <p>Chit Total: \$100.49</p> <p>-----</p> <p>XTRA TIP \$9.51</p> <p>Quick Mem Charge \$110.00-</p>
<p>ONEIDA GOLF & COUNTRY CLUB</p> <p>----- Chit Details -----</p> <p>Member: 00483 VANDEN HEUVEL, RONALD</p> <p>Server: Rick V</p> <p>Area: DINING</p> <p>Table#: 3</p> <p>Chit #: 02099850</p> <p>Date: Sep 3/17 Time: 1:02pm</p> <p>1 Fountain Soda 2.00</p> <p>3 Miller Light 12.00</p> <p>-----</p> <p>Sub-Total: 14.00</p> <p>Service Charge 2.80</p> <p>Sales Tax 0.84</p> <p>-----</p> <p>Chit Total: \$17.64</p> <p>-----</p> <p>Quick Mem Charge \$17.64-</p> <p>Extra Gratuity: _____</p> <p>Total: _____</p>	<p>ONEIDA GOLF & COUNTRY CLUB</p> <p>----- Chit Details -----</p> <p>Member: 00483 VANDEN HEUVEL, RONALD</p> <p>Server: Karen D</p> <p>Area: DINING</p> <p>Table#: Covers: 4</p> <p>Chit #: 02100210</p> <p>Date: Sep 9/17 Time: 1:09pm</p> <p>1 SPECIAL ITEM HOT 3.00</p> <p>Crispy Chix On Cobb</p> <p>3 DESSERT CART 21.00</p> <p>2 SHRIMP COCKTAIL 24.00</p> <p>1 CAESAR SALAD 13.00</p> <p>1 COBB SALAD 11.00</p> <p>1 ONEIDA SIDE 3.50</p> <p>1 QUINAO CHICKEN 22.00</p> <p>1 TENDERLOIN SAND 18.00</p> <p>-----</p> <p>Sub-Total: 115.50</p> <p>Service Charge 23.10</p> <p>Sales Tax 6.93</p> <p>-----</p> <p>Chit Total: \$145.53</p> <p>-----</p> <p>XTRA TIP \$30.00</p> <p>Quick Mem Charge \$175.53-</p>	<p>ONEIDA GOLF & COUNTRY CLUB</p> <p>----- Chit Details -----</p> <p>Member: 00483 VANDEN HEUVEL, RONALD</p> <p>Server: Rick V</p> <p>Area: DINING</p> <p>Table#: 3</p> <p>Chit #: 02100697</p> <p>Date: Sep 21/17 Time: 1:02pm</p> <p>1 Bottled Soda 2.75</p> <p>1 Whitehaven Sauv. B 10.00</p> <p>1 BFFALO WRAP 12.00</p> <p>-----</p> <p>Sub-Total: 24.75</p> <p>Service Charge 4.95</p> <p>Sales Tax 1.49</p> <p>-----</p> <p>Chit Total: \$31.19</p> <p>-----</p> <p>Quick Mem Charge \$31.19-</p> <p>Extra Gratuity: _____</p> <p>Total: _____</p>

<p>ONEIDA GOLF & COUNTRY CLUB</p> <p>----- Chit Details -----</p> <p>Member: 00483 VANDEN HEUVEL, RONALD</p> <p>Server: Jean K</p> <p>Area: DINING</p> <p>Table#: 3</p> <p>Chit #: 02101059</p> <p>Date: Sep 24/17 Time: 1:08pm</p> <p>1 Fountain Soda 2.00</p> <p>2 Whitehaven Sauv. B 20.00</p> <p>-----</p> <p>Sub-Total: 22.00</p> <p>Service Charge 4.40</p> <p>Sales Tax 1.32</p> <p>-----</p> <p>Chit Total: \$27.72</p> <p>=====</p> <p>XTRA TIP \$6.00</p> <p>Quick Mem Charge \$33.72-</p>	<p>ONEIDA GOLF & COUNTRY CLUB</p> <p>----- Chit Details -----</p> <p>Member: 00483 VANDEN HEUVEL, RONALD</p> <p>Server: Michelle C</p> <p>Area: DINING</p> <p>Table#: 1</p> <p>Chit #: 02101094</p> <p>Date: Sep 26/17 Time: 1:10pm</p> <p>3 Haymaker 21.00</p> <p>5 Fountain Soda 10.00</p> <p>1 Small Juice 2.00</p> <p>-----</p> <p>Sub-Total: 33.00</p> <p>Service Charge 6.60</p> <p>Sales Tax 1.98</p> <p>-----</p> <p>Chit Total: \$41.58</p> <p>=====</p> <p>XTRA TIP \$10.00</p> <p>Quick Mem Charge \$51.58-</p>	<p>ONEIDA GOLF & COUNTRY CLUB</p> <p>----- Chit Details -----</p> <p>Member: 00483 VANDEN HEUVEL, RONALD</p> <p>Server: Cathy D</p> <p>Area: DINING</p> <p>Table#: Covers: 1</p> <p>Chit #: 02101389</p> <p>Date: Sep 30/17 Time: 1:08pm</p> <p>1 BFFALO WRAP 12.00</p> <p>-----</p> <p>Sub-Total: 12.00</p> <p>Service Charge 2.40</p> <p>Sales Tax 0.72</p> <p>-----</p> <p>Chit Total: \$15.12</p> <p>=====</p> <p>XTRA TIP \$5.00</p> <p>Member Charge \$20.12-</p>
<p>ONEIDA GOLF & COUNTRY CLUB</p> <p>----- Chit Details -----</p> <p>Member: 00483 VANDEN HEUVEL, RONALD</p> <p>Server: Stefanie B</p> <p>Area: DINING</p> <p>Table#: Covers: 2</p> <p>Chit #: 02101060</p> <p>Date: Sep 24/17 Time: 1:11pm</p> <p>1 SPECIAL ITEM COLD 7.00</p> <p>Veggies</p> <p>1 SM MAC/CH 18.00</p> <p>-----</p> <p>Sub-Total: 25.00</p> <p>Service Charge 5.00</p> <p>Sales Tax 1.50</p> <p>-----</p> <p>Chit Total: \$31.50</p> <p>=====</p> <p>XTRA TIP \$7.00</p> <p>Quick Mem Charge \$38.50-</p>	<p>ONEIDA GOLF & COUNTRY CLUB</p> <p>----- Chit Details -----</p> <p>Member: 00483 VANDEN HEUVEL, RONALD</p> <p>Server: Karen D</p> <p>Area: DINING</p> <p>Table#: Covers: 3</p> <p>Chit #: 02101327</p> <p>Date: Sep 29/17 Time: 1:09pm</p> <p>1 DESSERT CART 7.00</p> <p>2 SHRIMP COCKTAIL 24.00</p> <p>1 CAESAR SALAD 13.00</p> <p>1 WEDGE SIDE 3.50</p> <p>1 PASTA SPECIAL 28.00</p> <p>1 CRAB APP 12.00</p> <p>1 PERCH PLATE 18.00</p> <p>-----</p> <p>Sub-Total: 105.50</p> <p>Service Charge 21.10</p> <p>Sales Tax 6.33</p> <p>-----</p> <p>Chit Total: \$132.93</p> <p>=====</p> <p>XTRA TIP \$7.07</p> <p>Quick Mem Charge \$140.00-</p>	<p>ONEIDA GOLF & COUNTRY CLUB</p> <p>----- Chit Details -----</p> <p>Member: 00483 VANDEN HEUVEL, RONALD</p> <p>Server: Rick V</p> <p>Area: DINING</p> <p>Table#: 3</p> <p>Chit #: 02101390</p> <p>Date: Sep 30/17 Time: 1:02pm</p> <p>1 Fountain Soda 2.00</p> <p>2 Whitehaven Sauv. B 20.00</p> <p>-----</p> <p>Sub-Total: 22.00</p> <p>Service Charge 4.40</p> <p>Sales Tax 1.32</p> <p>-----</p> <p>Chit Total: \$27.72</p> <p>=====</p> <p>XTRA TIP \$8.00</p> <p>Quick Mem Charge \$35.72-</p>
<p>ONEIDA GOLF & COUNTRY CLUB</p> <p>----- Chit Details -----</p> <p>Member: 00483 VANDEN HEUVEL, RONALD</p> <p>Server: Cathy D</p> <p>Area: DINING</p> <p>Table#: 1</p> <p>Chit #: 02101093</p> <p>Date: Sep 26/17 Time: 1:08pm</p> <p>1 SIDE OF SWEET POTA 2.50</p> <p>2 SHRIMP COCKTAIL 24.00</p> <p>1 CAESAR SALAD 13.00</p> <p>1 CAESAR SIDE</p> <p>1 QUESADILLA 20.00</p> <p>1 S & T SPECIAL 32.00</p> <p>1 CHILD GR CHEESE 6.75</p> <p>-----</p> <p>Sub-Total: 98.25</p> <p>Service Charge 19.65</p> <p>Sales Tax 5.90</p> <p>-----</p> <p>Chit Total: \$123.80</p> <p>=====</p> <p>XTRA TIP \$25.20</p> <p>Member Charge \$149.00-</p>	<p>ONEIDA GOLF & COUNTRY CLUB</p> <p>----- Chit Details -----</p> <p>Member: 00483 VANDEN HEUVEL, RONALD</p> <p>Server: Jean K</p> <p>Area: DINING</p> <p>Table#: 1</p> <p>Chit #: 02101335</p> <p>Date: Sep 29/17 Time: 1:08pm</p> <p>2 Haymaker 14.00</p> <p>2 Fountain Soda 4.00</p> <p>1 Small Juice 2.00</p> <p>-----</p> <p>Sub-Total: 20.00</p> <p>Service Charge 4.00</p> <p>Sales Tax 1.20</p> <p>-----</p> <p>Chit Total: \$25.20</p> <p>=====</p> <p>Quick Mem Charge \$25.20-</p> <p>Extra Gratuity:</p> <p>Total:</p>	<p>ONEIDA GOLF & COUNTRY CLUB</p> <p>----- Chit Details -----</p> <p>Member: 00483 VANDEN HEUVEL, RONALD</p> <p>Server: Cathy D</p> <p>Area: DINING</p> <p>Table#: Covers: 1</p> <p>Chit #: 02101393</p> <p>Date: Sep 30/17 Time: 1:08pm</p> <p>1 DESSERT CART 7.00</p> <p>-----</p> <p>Sub-Total: 7.00</p> <p>Service Charge 1.40</p> <p>Sales Tax 0.42</p> <p>-----</p> <p>Chit Total: \$8.82</p> <p>=====</p> <p>XTRA TIP \$4.00</p> <p>Member Charge \$12.82-</p>

<p>ONEIDA GOLF & COUNTRY CLUB ----- Chit Details ----- Member: 00483 VANDEN HEUVEL, RONALD Server: Cabana Staff Area: CABANA-TIKI BAR Table#: Covers: 3 Chit #: 04088322 Date: Sep 4/17 Time: 1:07pm 1 BUFFALO CHICKEN WR 12.00 1 SIGNATURE SALAD 10.00 1 KIDS GRILLED CHEES 7.00 1 SHRIMP TACOS 14.00 1 REG FOUNTAIN SODA 2.00 1 JUICE 2.75 1 REGULAR SLUSHIE 2.75 1 Table # 38 1 Cabana Chardonnay 12.00 Sub-Total: 62.50 Service Charge 12.50 Sales Tax 3.75 Chit Total: \$78.75 XTRA TIP \$20.00 Quick Mem Charge \$98.75-</p>	<p>ONEIDA GOLF & COUNTRY CLUB ----- Chit Details ----- Member: 00483 VANDEN HEUVEL, RONALD Server: Cathy D Area: BANQUET Table#: Covers: 4 Chit #: 09009953 Date: Sep 6/17 Time: 1:08pm 1 WINE SALES 60.00 Ghost Pines Zin Item Discount -30.00 4 Fiesta Night Adult 60.00 Sub-Total: 90.00 Service Charge 24.00 Sales Tax 5.70 Chit Total: \$119.70 XTRA TIP \$25.00 Member Charge \$144.70-</p>	<p>ONEIDA GOLF & COUNTRY CLUB ----- Chit Details ----- Member: 00483 VANDEN HEUVEL, RONALD Server: Golf Pro Area: PRO SHOP Table#: Chit #: 10194925 Date: Sep 3/17 Time: 1:04pm 1 18 HOLES 2 BAGS 40.00 1 GOLF BALLS 46.00 Prov1 2 DAILY GREENS 190.00 Sub-Total: 276.00 SALES TAX 13.80 Chit Total: \$289.80 Quick Mem Charge \$289.80- Extra Gratuity: Total:</p>
<p>ONEIDA GOLF & COUNTRY CLUB ----- Chit Details ----- Member: 00483 VANDEN HEUVEL, RONALD Server: Bobbi N Area: BEV CART / SHACQUE Table#: Chit #: 06007586 Date: Sep 3/17 Time: 1:10pm 1 Granola Bar 2.50 3 Bottled Soda 8.25 1 Miller Light 4.00 Sub-Total: 14.75 Service Charge 2.95 Sales Tax 0.89 Chit Total: \$18.59 Member Charge \$18.59- Extra Gratuity: Total:</p>	<p>ONEIDA GOLF & COUNTRY CLUB ----- Chit Details ----- Member: 00483 VANDEN HEUVEL, RONALD Server: Jean K Area: BANQUET Table#: 1 Chit #: 09009969 Date: Sep 6/17 Time: 1:08pm 2 Fountain Soda 4.00 Sub-Total: 4.00 Service Charge 0.80 Sales Tax 0.24 Chit Total: \$5.04 XTRA TIP \$2.00 Quick Mem Charge \$7.04-</p>	<p>ONEIDA GOLF & COUNTRY CLUB ----- Chit Details ----- Member: 00483A VANDEN HEUVEL, KELLY Server: Golf Pro Area: PRO SHOP Table#: Chit #: 10194958 Date: Sep 3/17 Time: 1:04pm 1 GOLF SHOES 110.00 Pum Ignite Shoes Sub-Total: 110.00 SALES TAX 5.50 Chit Total: \$115.50 Quick Mem Charge \$115.50- Extra Gratuity: Total:</p>
<p>ONEIDA GOLF & COUNTRY CLUB ----- Chit Details ----- Member: 00483 VANDEN HEUVEL, RONALD Server: Morgan M-H Area: BEV CART / SHACQUE Table#: Chit #: 06007630 Date: Sep 4/17 Time: 1:11pm 4 Granola Bar 10.00 1 Bottled Soda 2.75 Sub-Total: 12.75 Service Charge 2.55 Sales Tax 0.77 Chit Total: \$16.07 Member Charge \$16.07- Extra Gratuity: Total:</p>	<p>ONEIDA GOLF & COUNTRY CLUB ----- Chit Details ----- Member: 00483 VANDEN HEUVEL, RONALD Server: Golf Pro Area: PRO SHOP Table#: Chit #: 10194924 Date: Sep 3/17 Time: 1:04pm 1 18 HOLES 2 BAGS 40.00 1 DAILY GREENS 95.00 Sub-Total: 135.00 SALES TAX 6.75 Chit Total: \$141.75 Quick Mem Charge \$141.75- Extra Gratuity: Total:</p>	<p>ONEIDA GOLF & COUNTRY CLUB ----- Chit Details ----- Member: 00483 VANDEN HEUVEL, RONALD Server: Golf Pro Area: PRO SHOP Table#: Chit #: 10195007 Date: Sep 4/17 Time: 1:04pm 2 18 HOLES SHARE CAR 40.00 1 DAILY GREENS 95.00 Sub-Total: 135.00 SALES TAX 6.75 Chit Total: \$141.75 Quick Mem Charge \$141.75- Extra Gratuity: Total:</p>
	<p>ONEIDA GOLF & COUNTRY CLUB ----- Chit Details ----- Member: 00483A VANDEN HEUVEL, KELLY Server: Golf Pro Area: PRO SHOP Table#: Chit #: 10194947 Date: Sep 3/17 Time: 1:04pm 1 9 HOLES 3 BAGS 30.00 Sub-Total: 30.00 SALES TAX 1.50 Chit Total: \$31.50 Quick Mem Charge \$31.50- Extra Gratuity:</p>	

<p>ONEIDA GOLF & COUNTRY CLUB ----- Chit Details ----- Member: 00483 VANDEN HEUVEL, RONALD Server: Golf Pro Area: PRO SHOP Table#: Chit #: 10195519 Date: Sep 14/17 Time: 1:04pm 10 GOLF CLUBS 872.00 Ping G Driver Ping 5 Wood Ping Hybrid Ping Irons</p> <p>Sub-Total: 872.00 SALES TAX 43.60</p> <p>Chit Total: \$915.60</p> <p>Quick Mem Charge \$915.60- Extra Gratuity: Total:</p>	<p>ONEIDA GOLF & COUNTRY CLUB ----- Chit Details ----- Member: 00483A VANDEN HEUVEL, KELLY Server: Golf Pro Area: PRO SHOP Table#: Chit #: 10196183 Date: Sep 24/17 Time: 1:04pm 2 9 HOLES SHARE CART 20.00</p> <p>Sub-Total: 20.00 SALES TAX 1.00</p> <p>Chit Total: \$21.00</p> <p>Quick Mem Charge \$21.00- Extra Gratuity: Total:</p>	<p>ONEIDA GOLF & COUNTRY CLUB ----- Chit Details ----- Member: 00483A VANDEN HEUVEL, KELLY Server: Golf Pro Area: PRO SHOP Table#: Chit #: 10196553 Date: Sep 30/17 Time: 1:04pm 1 GOLF CLUBS 150.50 Ping Putter</p> <p>Sub-Total: 150.50 SALES TAX 7.53</p> <p>Chit Total: \$158.03</p> <p>Quick Mem Charge \$158.03- Extra Gratuity: Total:</p>
<p>ONEIDA GOLF & COUNTRY CLUB ----- Chit Details ----- Member: 00483 VANDEN HEUVEL, RONALD Server: Golf Pro Area: PRO SHOP Table#: Chit #: 10195769 Date: Sep 17/17 Time: 1:04pm 1 LADIES TOPS 70.00 Vinayrd Vines</p> <p>Sub-Total: 70.00 SALES TAX 3.50</p> <p>Chit Total: \$73.50</p> <p>Quick Mem Charge \$73.50- Extra Gratuity: Total:</p>	<p>ONEIDA GOLF & COUNTRY CLUB ----- Chit Details ----- Member: 00483 VANDEN HEUVEL, RONALD Server: Golf Pro Area: PRO SHOP Table#: Chit #: 10196186 Date: Sep 24/17 Time: 1:04pm 1 GOLF BALLS 7.00 Volvix Balls</p> <p>Sub-Total: 7.00 SALES TAX 0.35</p> <p>Chit Total: \$7.35</p> <p>Quick Mem Charge \$7.35- Extra Gratuity: Total:</p>	<p>ONEIDA GOLF & COUNTRY CLUB ----- Chit Details ----- Member: 00483A VANDEN HEUVEL, KELLY Server: Golf Pro Area: PRO SHOP Table#: Chit #: 10196574 Date: Sep 30/17 Time: 1:04pm 1 LESSON - ANDREW 20.00</p> <p>Sub-Total: 20.00</p> <p>Chit Total: \$20.00</p> <p>Quick Mem Charge \$20.00- Extra Gratuity: Total:</p>
<p>ONEIDA GOLF & COUNTRY CLUB ----- Chit Details ----- Member: 00483A VANDEN HEUVEL, KELLY Server: Golf Pro Area: PRO SHOP Table#: Chit #: 10195773 Date: Sep 17/17 Time: 1:04pm 1 LESSON - ANDREW 20.00</p> <p>Sub-Total: 20.00</p> <p>Chit Total: \$20.00</p> <p>Quick Mem Charge \$20.00- Extra Gratuity: Total:</p>	<p>ONEIDA GOLF & COUNTRY CLUB ----- Chit Details ----- Member: 00483A VANDEN HEUVEL, KELLY Server: Golf Pro Area: PRO SHOP Table#: Chit #: 10196256 Date: Sep 26/17 Time: 1:04pm 1 GOLF BAG 154.50</p> <p>Sub-Total: 154.50 SALES TAX 7.73</p> <p>Chit Total: \$162.23</p> <p>Quick Mem Charge \$162.23- Extra Gratuity: Total:</p>	<p>ONEIDA GOLF & COUNTRY CLUB ----- Chit Details ----- Member: 00483A VANDEN HEUVEL, KELLY Server: Golf Pro Area: PRO SHOP Table#: Chit #: 10196578 Date: Sep 30/17 Time: 1:04pm 4 MEN'S TOPS 160.00 Ua Mens Top</p> <p>Sub-Total: 160.00 SALES TAX 8.00</p> <p>Chit Total: \$168.00</p> <p>Quick Mem Charge \$168.00- Extra Gratuity: Total:</p>
<p>ONEIDA GOLF & COUNTRY CLUB ----- Chit Details ----- Member: 00483A VANDEN HEUVEL, KELLY Server: Mary Ellen J Area: PRO SHOP Table#: Chit #: 10195871 Date: Sep 21/17 Time: 1:02pm 1 LESSON - ANDREW 20.00</p> <p>Sub-Total: 20.00</p> <p>Chit Total: \$20.00</p> <p>Quick Mem Charge \$20.00- Extra Gratuity: Total:</p>	<p>ONEIDA GOLF & COUNTRY CLUB ----- Chit Details ----- Member: 00483A VANDEN HEUVEL, KELLY Server: Golf Pro Area: PRO SHOP Table#: Chit #: 10196276 Date: Sep 27/17 Time: 1:04pm 1 LESSON - ANDREW 20.00</p> <p>Sub-Total: 20.00</p> <p>Chit Total: \$20.00</p> <p>Quick Mem Charge \$20.00- Extra Gratuity: Total:</p>	

Krueger, Matthew (USAWIE)

From: Austin, T. Ryan R. (MW) (FBI) <traustin@fbi.gov>
Sent: Monday, June 4, 2018 6:20 PM
To: Hager, Sara J.; Krueger, Matthew (USAWIE)
Subject: Fwd: Golf Clubs

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----- Original message -----

From: Mary Ellen Johnson <mejohanson@troon.com>
Date: 6/4/18 6:01 PM (GMT-06:00)
To: "Austin, T. Ryan R. (MW) (FBI)" <traustin@fbi.gov>
Subject: FW: Golf Clubs

Ryan:

Below is the correspondence mentioned in my previous email.

Best,

Mary Ellen Johnson • Property Accountant • Oneida Golf & Country Club
P 920.498.6681 • C 920.676.6853 • F 920.884.1091 • mejohanson@troon.com
oneidagcc.com

#EXPERIENCETROON

From: jim Schultz <jschultz416@gmail.com>
Sent: Monday, June 4, 2018 5:56 PM
To: Mary Ellen Johnson <mejohanson@troon.com>
Subject: Fwd: Golf Clubs

----- Forwarded message -----

From: Kelly Van Den Heuvel <klyvdh@gmail.com>
Date: Fri, May 11, 2018 at 9:36 PM
Subject: Golf Clubs
To: <jschultz416@gmail.com>

Hi Jim:

I have asked for a set of clubs for Mother's Day. I just have never felt comfortable with my Nike clubs. Would like to give them to Kate. Would you have time this weekend or next week to fit me with a set?

In addition, both Kate and Henry need to set up a some times with you or Andy for lessons. We can talk about that when I see you. We will be at the club tomorrow afternoon for dinner.

Hope all is well with you.

Regards,

Kelly VDH

Sent from my iPhone

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Jim Schultz
Director of Golf
Oneida Golf and Country Club
P.O. Box 10736
Green Bay, Wi 54307
920-498-6510

ONEIDA GOLF & COUNTRY CLUB

----- Chit Details -----

Member: 00483A KELLY VANDEN HEUVEL
Server: Golf Pro
Area: PRO SHOP
Chit #: 10200888
Date: Jun 5/18 Time: 10:23am

GOLF CLUBS	273.00
- COBRA DRIVER	
GOLF CLUBS	182.00
- COBRA 5 WOOD	
GOLF CLUBS	336.00
- 3 COBRA HYBRIDS	

Sub-Total:	791.00
SALES TAX	43.51

Chit Total:	\$834.51
	=====

Quick Mem Charge	\$834.51-
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Member's Number

Member's Signature

----- End of Chit -----