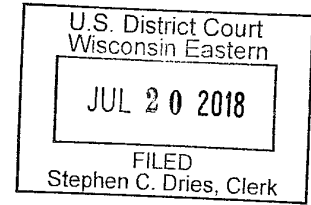


**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN**

UNITED STATES OF AMERICA

PLAINTIFF,

v.



CASE NO. 2017CR160
Memorandum of Law in Support of
Defendant's Motion to Dismiss
Counsel

RONALD VAN DEN HEUVEL

DEFENDANT.

MEMORANDUM OF LAW

I Ronald H Van Den Heuvel must hereby dismiss court appointed counsel Robert LaBell and attorney Eric Hart as my lead Attorneys in the above encaptioned case.

The two attorneys Robert LaBell and Eric Hart have failed to ever come to De Pere to work our case documents. Not once, not one time. Now I must suffer the consequences. This is inadequate preparation.

Attorney LaBell would not allow Attorney Hart to come to De Pere to work the case documents. Attorney LaBell stated that your Honor

Judge William Griesbach would not allow them to be paid to work documents in De Pere.

By not inspecting the overwhelming number of documents in this matter, all of which are kept where returned to 2077 A & B Lawrence Drive in De Pere, they had no idea as to the time it would take to properly defend this case. They have only reviewed certain selective documents that the Prosecution has put forth. These documents were put together with omitted and altered evidence. They had no idea that 3 people working 700 pages each per day would take six and a half years to file and inspect all of the documents which needed to be inspected to find the exculpatory evidence are now partially sorted.

Attorneys LaBell and Hart lack of work with the case documents hurt their ability to know critical details such as Sgt Shatner was a leader of the Governor Walker recall petition. Agent Hager was also a leader in the Walker Recall Petition. Judge Zuidmulder was the only judge in northeast Wisconsin to sign the Walker recall petition. Judge Zuidmulder's daughter assisted the prosecution of this case. Judge Zuidmulder signed Shatner's search warrant. Judge Zuidmulder has been dismissed for appearance of impartiality. The Department of Justice and prosecution knows for certain there were more than 8 perjured

statements used to get this Search Warrant, which had bogus probable cause. The search was nothing more than a general search taking everything from 1969 to July 2015. Sargent Shatner stated there were too many documents to go through so they took every document and computer equipment and 2009 sample jars from 2077 A & B Lawrence Drive and from Ron, Kelly, Henry and Kate's residential house.

Kelly, Henry, Kate, Julie Gumban, and Kelly's company KYHKJG, LLC were not listed on the Search Warrant. Kelly's medical records were a major issue.

Neither Labell and Hart has even seen the disarray or bungling or intentional misplacing or commingling or the sheer volume equaling 800 bank boxes. Neither observed the injustice or knew of the required hours to prepare this case.

Neither Attorney LeBell nor Attorney Hart Bank could review exculpatory bank statements of Ronald Van Den Heuvel \$1,730,000 cash deposits in AIG Bank from 2007 to 2009 were put in 1977 car wash files. Or the Tak and Godfrey and Kahn letter stating to Tak "her is Godfrey's final draft of the Final Business Terms agreement and Sharad please understand that you have pledged 48% of the tissue mills shares". That

document was put back in the box containing 1984 VOS Electric Technologies.

Neither attorney could observe the intentionally omitted critical documents not scanned into Relativity, such as the Borrowing Resolutions prepared by outside counsel clearly showing that there were no straw borrowers on any of the Horicon loans.

The Department of Justice and prosecution know for certain that millions of illegally gained private documents from the general search have been given to the Oneida Eye. This allows google to pick them up for the social media. After the Oneida Eye and Godfrey lies, and misrepresented statements. Nothing printed there is truthful. This hurts picking a jury!

The Government selectively withheld evidence from Relativity. Wisconsin Attorney General Schimmel has proven that the DOJ has done this before. Also why was Relativity withheld from Ron Van Den Heuvel in Case 16CRD64 prior to his plea. Could Labell have attained access to Relativity for me? Was this intentionally withheld due to the fact that so many of the documents were outside the search warrant?

The Government had a trial balance type document showing all fundings in and out of Ron's certain companies dated May 7 of 2015. Why

would critical exculpatory piece of evidence be withheld. This clearly showed that Ron personally did not receive any of the funding dollars was there just not enough time. Attorney LaBell's lack of working the documents in De Pere caused this oversight. Failure to investigate, research and prepare is like having no counsel at all.

If the intent is justice let Ron have six months with the commingled documents and his attorneys as was promised. The Search Warrant illegal and they intentionally commingled millions of documents. This occurred and was stated in Sargent Shatner's testimony.

Try to imagine how it would be possible to defend RVDH under these circumstances or to advise him on a plea agreement with little or no document review. Again failure to investigate, research, and prepare is like having no counsel at all.

The companies documents clearly show and validate the process of taking in food contaminated waste, fast-food waste and curbside garbage then sanitizing it to kill 99.9 percent of germs, then sorting it. The five paper sorts make FDA approved pulp for paper cups, cartons, certified 100 percent post consumer tissue, and packaging papers. Polys from these papers were made with a high tech process. Polys and plastics are then made into oils, chemicals, and syngas. Food waste is put into an

enzymatic digester to make sugars. Metals, aluminums and PET are baled for resale. All syngas is used for drying paper or making electricity.

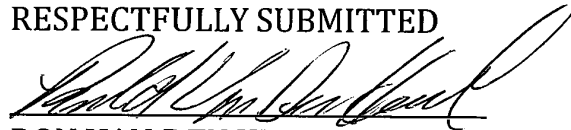
The entire process has been written into a 32 claim process reclamation patent application for protection. The application has been intentionally not completed and has five years of protection. Every city over 250,000 people will have no need for a landfill and can cut their garbage handling and moving costs and the city's landfill tipping charge can be cut to zero, just delivery costs.

Now imagine: **no** incineration, **no** sludge, **no** waste water discharge, **no** landfill needed. It will also produce 245 new jobs with pay at \$47000 or better a year, and jobs that anyone can be trained to do. This process has been validated to 173,000 tons of poly removal and as a profitable tissue and paper packaging maker with costs that are 400 dollars per ton below industry costs. This system is commercially validated with designed chemical formulas written, and equipment specified, permits completed, and the warranted EPC content finalized with 44 industrial experts.

Why did Mr. Labell choose not to review this validated process? Lack of time with Ron Van Den Heuvel and his documents can be explained as one reason, and money the other. New lawyers have been to

De Pere already and have reviewed for conflicts. Please see the Hanson and Reynolds letters attached. Ron Van Den Heuvel will proceed pro se until this seven party legal team is put in place and brought up to date and ready.

RESPECTFULLY SUBMITTED

A handwritten signature in black ink, appearing to read 'Ron Van Den Heuvel', written over a horizontal line.

RON VAN DEN HEUVEL
DEFENDANT