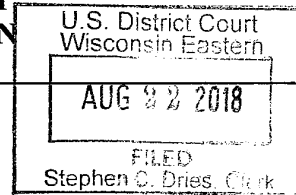


UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN



UNITED STATES OF AMERICA

PLAINTIFF,

V.

CASE NO. 17-CR-160  
NOTICE OF MOTION  
AND DEFENDANT'S  
MOTION SEEKING  
DAMAGES AND  
REMEDY

RONALD VAN DEN HEUVEL

DEFENDANT

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DEFENDANTS' MOTION SEEKING DAMAGES AND REMEDY

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Defendant Ronald H. Van Den Heuvel files this Motion *Pro Se*, and ask this court to grant him **general damages** against the Plaintiff. The Defendant sites the following in support of this motion:

1. The Plaintiff has accused the Defendant and his company, in pleadings to this court, of using investor money to support his lavish lifestyle. On February 17, 2018 Defendant counsel was provided by the Plaintiff, a document, herein known as a '*trial balance*' which outlined in great detail showing all fundings in and out of the companies. This *trial balance* was dated May 7, 2015. Defendant had no knowledge of author nor had the Defendant ever seen the document. At that time, the Plaintiff had knowledge that their statement had no element of fact.
2. The Plaintiff's withheld this critical piece of exculpatory evidence and in doing so, these false statements were made public by various papers and on the internet.

3. This false statement by the Plaintiff was recklessly made against the Defendant.  
This *trial balance* constituted factual information and had been in the possession of the Plaintiff since July 3, 2015.
  4. The Defendant suffered mental and physical anguish, and hardship subsequently a conviction and incarceration. The Plaintiff and the Defendant's counsel withheld this evidence from the Defendant until a plea deal was signed in case 16-CR-064. The suppression of this information not only damaged the Defendant, it severely damaged the companies, it's shareholders, investors, employees and vendors.
- THEREFORE, the Defendant prays that this court will award general damages to Defendant, his companies, the shareholders, investors, and employees by correcting this false statement.

Dated at Green Bay, Wisconsin, this 22<sup>th</sup> day of August 2018.

RESPECTFULLY SUBMITTED,



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RONALD VAN DEN HEUVEL  
DEFENDANT