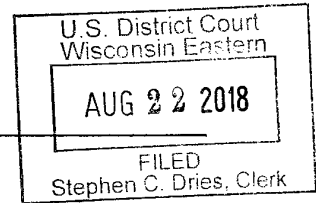


**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN**



UNITED STATES OF AMERICA

PLAINTIFF,

V.

**CASE NO. 17-CR-160
NOTICE OF MOTION
AND MOTION FOR
RELEASE UNDER
HUBER LAW**

RONALD VAN DEN HEUVEL

DEFENDANT

MOTION FOR RELEASE UNDER RULE 46 OF THE HUBER

Defendant Ronald H. Van Den Heuvel files this Motion *Pro Se*, pursuant to ask the court to her his motion for release under Rule 46 of the Huber Law. The Defendant believes it would serve that court and the taxpayers of Brown County to have the Defendant out on Huber. In support of this motion, the Defendant sites the following:

1. The Defendant is a diabetic. The courts assert the following;
'People with diabetes in correctional facilities should receive care that meets national standards. Correctional institutions have unique circumstances that need to be considered so that all standards of care may be achieved (3). Correctional institutions should have written policies and procedures for the management of diabetes and for training of medical and correctional staff in diabetes care practices. These policies must take into consideration issues such as security needs, transfer from one facility to another, and access to medical personnel and equipment, so that all appropriate levels of care are provided. Ideally, these policies should encourage or at least allow patients to self-manage their diabetes. Ultimately, diabetes management is dependent upon having access to needed medical personnel and equipment. Ongoing diabetes therapy is important in

order to reduce the risk of later complications, including cardiovascular events, visual loss, renal failure, and amputation. Early identification and intervention for people with diabetes is also likely to reduce short-term risks for acute complications requiring transfer out of the facility, thus improving security.’ The Defendant’s blood sugars have averaged over 308 for the month of July and August. Several times the Defendant’s blood sugar was over 400.

2.. The Defendant’s physician from Aurora Healthcare prescribed 110 units total per day of two types of insulin. BCC will only allow the Defendant a maximum daily intake of 47 total Hemo units of insulin to be taken. Attention to this immediately is critical. BCC prison allow 110 to 140. The Defendant’s medicines on the outside cost approximately \$850.00 per month, which is covered by his private insurance.

3. Visits are limited to one per day and only off your list of five. Your list can only change once per month. The visitor cannot bring any papers, pencils, electronic devices, or recorders in with them, nor can they be left for me at the front station and the Defenant cannot give anything to the visitors for my attorneys..

4. Visit by attorneys are allowed only during the time period of 8 AM to 11 AM and 1 PM to 4 PM or 6 PM to 7:30 PM. Any papers passed through cannot be in folders, cannot have any clips or staples in them and must be loose to fit through the ½ inch hole. Talking and reviewing documents with your lawyer is next to impossible. Lawyer call in are very difficult to schedule. Most calls usually require at least two days prior scheduling to secure a time. According **Standard 4- Standard 4-2.1 Communication** Every jurisdiction should guarantee by statute or rule of court the right of an accused person to prompt and effective communication with a lawyer and should require that reasonable access to a telephone or other facilities be provided for that purpose. The Defendant contends that he cannot defend himself or receive a fair and just trial without being near his documents.

WHEREFORE, the Defendant prays that the court will hear his aforementioned motion and grant him a Huber Release so that he may get his health in order at his own expense,

be with his documents to prepare for his case and work towards restitution.

Dated at Green Bay, Wisconsin, this 22th day of August 2018.

RESPECTFULLY SUBMITTED,

A handwritten signature in black ink, appearing to read "Ron Van Den Heuvel", written over the word "SUBMITTED".

RONALD VAN DEN HEUVEL
DEFENDANT