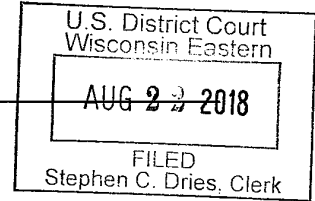


UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN



UNITED STATES OF AMERICA

PLAINTIFF,

V.

CASE NO. 17-CR-160  
NOTICE OF MOTION  
AND MOTION FOR  
RETURN OF PROPERTY

RONALD VAN DEN HEUVEL

DEFENDANT

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MOTION FOR RETURN OF PROPERTY

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Defendant Ronald H. Van Den Heuvel files this Motion *Pro Se*, pursuant to Wis. Stat. § 986.20, moves the Court for an order returning to the Defendant his PCDI company server, taken during the search warrant executed on July 2, 2015 from his place of business located at 2077 Lawrence Drive, Suite A. The Defendant sites the following in support of this motion:

1. The late Michael Fitzgerald first requested the return of the Defendant's server with accounting (MAS90) to be returned over 34 months ago. According to Mr. Fitzgerald, the server was to have been mirrored, not taken. It has yet to be returned along with an estimated 209,000 other documents.
2. As a result of the Defendant's server not being returned to his possession, evidence shows that said server has continued to be used by people other than the Defendant. Defendant made his counsel aware that his server had not been returned. Defendant notified his counsel that the server was being used and he had evidence that altered email transmittals were being sent out under rvdh@pcdiwi.com's, the Defendant's domain without his knowledge or consent.

3. The Defendant contends that the failure by the government to return Defendant's server from where it was seized to the Defendant has allowed for the illegal sharing of documents. These emails and documents have been illegally taken, in some instances altered and given to the government and the Oneida Eye.
4. The Defendant immediately informed his counsel once he discovered the names of the parties having access to and possession of his server. The Defendant informed his counsel when the individuals acknowledged possession of his server. These individuals are illegally in possession of Defendant's server. Furthermore, these individuals have all shared in the possession and viewing of the Defendant's documents from the illegally obtained server which is still in their possession. The Defendant contends that these individuals have been reviewing, monitoring, at times altering and sending out my emails. They have illegal breached the Defendant's attorney client privilege by having full access, without my knowledge, of any and all correspondence between the Defendant and his attorney, Relativity software so provide by the Honorable Judge William Griesbach, and Defendant's PO officer.

The Defendant prays that the court will hear his Motion to Return so that justice could be served and he may properly defend himself and aid in his own defense.

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