UNITED STATES DISTRICT COURT EASTERN DISTRICTOF WISCONSIN

U.S. District Court
Wisconsin Eastern

AUG 2 2 2018

FILED
Stephen C. Dries, Clerk

UNITED STATES OF AMERICA

PLAINTIFF,

V.

CASE NO. 17-CR-160 NOTICE OF MOTION AND MOTION TO SUPPRESS

RONALD VAN DEN HEUVEL

DEFENDANT

NOTICE OF MOTION AND MOTION TO SUPPRESS

The Defendant, Ronald Van Den Heuvel, files the above Motion *Pro Se*, and hereby moves to suppress all interviews, affidavits, reports, documents and investigative notes obtained by Agent Sara Hager as a result of the warrant issued and subsequently executed by Sargent Mary Shatner on the defendants home and places of business so executed on July 2, 2105.

AS GROUNDS, the undersigned shows to the court that Sargent Mary Shatner used false information to secure a search warrant and Agent Sara Hager used evidence obtained in the illegal search warrant to secure indictments, interview witnesses, and defame the defendant and the companies to which he is a shareholder, For these reasons, the unjust search of Mr. Ronald Van Den Heuvel, his home and his related companies was unreasonable.

This motion is further based upon the attached Memorandum of Law. Dated in Green Bay, Wisconsin, this 22^{th} day of August, 2018.

RESPECTFULLY SUBMITTED

RONALD VAN DEN HEUVEL

DEFENDANT