

The Defendant's REAL NAME is Ronald H. Van Den Heuvel / Ronald Hewry Van Den Heuvel. When confronted by Oneida Eye on 8/10/18 in front of U.S. Atty. Matthew Krueger about using the wrong middle initial ('D'), defense attorney Robert LeBell blamed his secretary. Yet, Atty. LeBell continued to submit court filings using the WRONG NAME for his client.

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

UNITED STATES OF AMERICA,

Plaintiff,

v.

Case No. 17 CR 160

RONALD D. VAN DEN HEUVEL,

Defendant.

REPLY BRIEF FOR MOTION FOR CHANGE OF VENUE

The defendant provides the following reply to the government's response to pretrial motions. The government's description of the impact of pretrial publicity upon the defendant's right to a fair trial is minimized. The prejudice component has been demonstrated through the continued and varied media coverage. The descriptions in those articles, tweets, reports, broadcasts, and bloggings are neither dispassionate, nor are they accurate. Many of them independently demonstrate a bias and prejudgment of the defendant's guilt. The coverage has spanned years. The detailed nature and description of the events occurring during both of the defendant's cases has provided the community with ample basis to prejudge his guilt. No amount of careful voir dire can remedy the harm that has already infected a jury pool in this matter. The government asserts that the Oneida Eyes coverage should be discounted because of its relatively small influence, and convoluted and disorganized nature.

It fails to note that virtually every event that has occurred in the defendant's cases, as well as matters relating to the defendant, but not specifically part of the court filings, is described in the blog or is easily accessible through a link conveniently provided by the blog's author. There is virtually no need for access to PACER in this case because the Oneida Eye has provided the same service to the public. PACER, at least, offers the reader the documents in a non-editorialized fashion. The blogger from the Oneida Eye has depicted Van Den Heuvel as the virtual Anti-Christ. Contrary to the claim of the government, the pretrial coverage is not simply routine press offerings. They, in concert, paint a vivid picture of the defendant's alleged criminal conduct. The coverage is inflammatory, pervasive, and renders pretrial juror bias inevitable.

Dated at Milwaukee, Wisconsin this 31st day of August, 2018.

Respectfully Submitted,

/s/ Robert G. LeBell

Robert G. LeBell, SBN 01015710
Attorney for Defendant
1223 N. Prospect Avenue
Milwaukee, WI 53202
414-276-1233
Fax: 414-239-8565
dorbell@ldm-law.com

The Defendant's REAL NAME is Ronald H. Van Den Heuvel / Ronald Hewry Van Den Heuvel. When confronted by Oneida Eye on 8/10/18 in front of U.S. Atty. Matthew Krueger about using the wrong middle initial ('D'), defense attorney Robert LeBell blamed his secretary. Yet, Atty. LeBell continued to submit court filings using the WRONG NAME for his client.