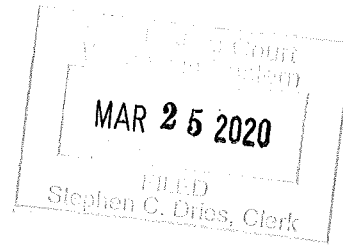


UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN
GREEN BAY DIVISION



UNITED STATES SECURITIES
AND EXCHANGE COMMISSION
Plaintiff,

v.

RONALD VAN DEN HEUVEL, and
GREENBOX NA DETROIT, LLC

Case No. 17-cv-1261

Hon. William C. Griesback

EMERGENCY MOTION FOR COMPASSIONATE RELEASE FOR EXTRAORDINARY
AND COMPELLING REASONS, INCLUDING A PRESIDENTIAL NATIONAL
EMERGENCY DECLARATION

NOW COMES, Defendant, Ronald Van Den Heuvel, Pro Se to request consideration for compassionate release due to the National Coronavirus outbreak creating a pandemic and "Extra Ordinary and compelling reasons for release - 18 USC 3582(c)(1)(A)(i)

HISTORY

- 1) Defendant Ronald Van Den Heuvel is requesting immediate release. Mr. Van Den Heuvel is 66 years old and suffers from a very serious auto immune disease that leaves his immunity as non existant. If he were to contract the cornoravirus it would certainly mean a death sentence for him.
- 2) Mr. Van Den Heuvel would be scheduled for release to home confinement, considering the benifit good time, on 1/3/2022.

3) Mr. Van Den Heuvel suffers from a serious health condition that, even according to prison officials, can not be treated in the prison system. (EX: See attached medical records)

PRESIDENTIAL NATIONAL EMERGENCY DECLARATION

4) The President of the United States has issued a National Emergency acknowledging the governments inability to control an active coronavirus outbreak. This Pandemic has blanketed the entire world creating an "extra ordinary and compelling reason" (18 use 3582(e)(1)(A)(i) for release.

5) The coronavirus pandemic has upended the day-to-day operation of the criminal justice system. Jury trials and other hearings have been suspended. Courthouses have either been restricted from the public or completely shut down. The State of Minnesota has ordered closure of restaurants, bars and schools as close contact is prohibited and gatherings of "no more than ten" (people) has been ordered by Governor Tim Walz.

6) Prison, like cruise ships and nursing homes put people at a heightened risk of contacting and rapidly transmitting the coronavirus (EX C- Washington post). Lowering the population of prisons and jails is the simplest and most effective way to disrupt the transmission of covid-19 (EX D Mpls Star tribune). A virus that has been overwhelmingly attacking elderly with existing and compromised health conditions.

7) To date more than nine countries have released tens of thousands of non-violent prisoners. The country of Iran released more than 50,000 prisoners as the virus swept the country (EX D) and jails in various states have started releasing non violent offenders.

8) As stated by corrections Commissioner Paul Schnell: "These prisons are petri dishes because they are a contained environment". In action will certainly change inmates imposed sentences to that of terminal.

9)

CONCLUSION

Mr. Van Den Heuvel, a non violent First time offender, BOP scored not a risk to the public, remains housed and daily exposed in close contact to more than 600 individuals. Mr. Van Den Heuvel age, health and environment assure him that he is most at risk if left at his current environment.

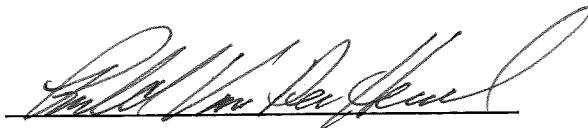
10)

PRAYER OF RELIEF

Mr. VanDen Heuvel request immediate release to home confinement to join his wife and family.

CERTIFICATION

I certify pursuant to 28 USC§1746 that the foregoing is true and correct to the best of my knowledge and belief.



Ronald VanDen Heuvel

3-21-2020

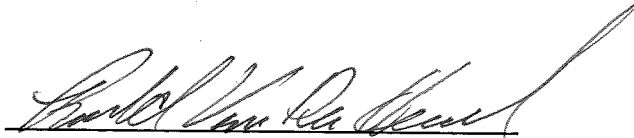
3/21/20

With Type 1 Onset Auto immune diabetes
And Two Minor Children with my wife thior
Mother fighting Breast cancer Time for
Home Confinement and Quarantine is Now.
As you can see the Medical Staff here has
worked hard but now RVDH is in a wheelchair
RVDH is A Care Level 3 Inmate in A Care 2 Facil.

CERTIFICATE OF SERVICE

I hereby certify I served a true and correct copy of this pleading entitled:
**"EMERGENCY MOTION FOR COMPASSIONATE RELEASE FOR EXTRAORDINARY AND
COMPELLING REASONS, Including a presidential nation EMERGENCY DECLARATION"**
upon the below-named parties by placing the same in the outgoing U.S.
Mail, with proper postage affixed thereto, at the Duluth Federal Prison
Camp, PO BOX 1000, Duluth MN 55814, on the twenty first day of March
2020, in reliance upon the mailbox rule as cited in Hovston v Lack
(2379 91988), for filing with the court.

To Clerk of the court
Brown County Circuit Court
125 S Jefferson ST STE 102
Green Bay, WI 54301



Ronald Van Den Heuvel
15653-089
Federal Prison Camp
PO BOX 1000
Duluth MN 55814

Dr, Rice,

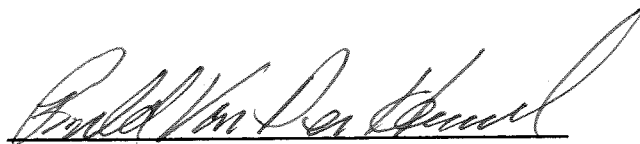
Thank you and your staff for the continued care given to Ronald Van Den Heuvel. I would like to discuss with you a request for compassionate release to self quarantined Home Confinement. As per the first step act of 2018. I am 66 years old with "Late onset auto immune type I diabetes. Officially called Latent Autoimmune diabetes of Adulthood". Even with diet and exercise I can never get off insulins. The auto immune part makes healing extreemily difficult as your staff knows. It has spread to four infections and pain in my lower jaw and has resulted in the loss of four teeth. I have also lost hearing and had my left big toe amputated. I would never survive Corona 19.

My only cure is the insulin pump with full time testing. That requires 10 doses small 8 ml rather than 2 of the 40 ml which is now being given. I am a care level 3 in a care level 2 facility. Compassionate release so I can be put back on the pump and pen is my only care remedy. The constant dysfunction of my insulin Beta cells of my pancreas and the immune systems role in attacking those cells can cause potentially deadly complications and constant pain. At quarantine home confinement cell therapy is available and works on me.

The DOJ and BOP promised me and my breast cancer recovering wife with two minor children that in the BOP the same level of care would be administered. After over two years we now know this was not a correct statement. I took the plea offer based on that promise.

I am a 66 year old first time non-violent offender who does not deserve this type of inadequate medical care! I understand that you and your staff have done everything possible. The facilities available to me at your institution are just not adequate to protect me from further deterioration of my health. The only way I will be safe from the virus and from further deterioration of my health is for me to get compassionate release to home confinement. In addition as you know an infection has put me in a wheel chair for 12 weeks. Infections can be better managed during home quarantine and confinement.

Thank you,

A handwritten signature in black ink, appearing to read "Ronald Van Den Heuvel", written over a horizontal line.

Ronald Van Den Heuvel

**Bureau of Prisons
Health Services
Medical Duty Status**

Reg #: 15653-089

Inmate Name: VANDEN HEUVEL, RONALD H

Housing Status

☐ confined to the living quarters except ☐ meals ☐ pill line ☐ treatments Exp. Date: _____
☐ on complete bed rest: ☐ bathroom privileges only Exp. Date: _____
☒ cell: ☐ cell on first floor ☐ single cell ☒ lower bunk ☐ airborne infection isolation Exp. Date: 04/24/2020
☒ other: can wear own purchased tennis shoes (includes old pair of diabetic soft shoe) Exp. Date: 01/13/2021

Physical Limitation/Restriction

☐ all sports Exp. Date: _____
☐ weightlifting: ☐ upper body ☐ lower body Exp. Date: _____
☐ cardiovascular exercise: ☐ running ☐ jogging ☐ walking ☐ softball Exp. Date: _____
☐ football ☐ basketball ☐ handball ☐ stationary equipment
☐ other: _____ Exp. Date: _____

May have the following equipment in his / her possession:

| Equipment | Start Date | End Date | Return Date |
|---------------------------------|------------|------------|-------------|
| Shower Protection Bag, Leg | 02/03/2020 | 03/31/2020 | |
| Wheelchair | 01/09/2020 | 02/06/2020 | |
| Hearing Aid-L | 12/23/2019 | | |
| Hearing Aid-R | 12/23/2019 | | |
| Alternate Institutional Shoes | 12/13/2019 | 01/13/2020 | |
| Diabetic composite Toe Shoes | | | |
| Glucose Meter | 08/26/2019 | | |
| Serial # EL241180 issued 9/3/19 | | | |

Work Restriction / Limitation:

Cleared for Food Service: No

| Restriction | Expiration Date |
|-----------------------|-----------------|
| Medical Convalescence | 02/18/2020 |

Comments: care level 3- toe amputation

| | |
|-------------------------|------------|
| Peterson, Ashley FNP-BC | 02/04/2020 |
| Health Services Staff | Date |

Inmate Name: VANDEN HEUVEL, RONALD H Reg #: 15653-089 Quarters: 002

ALL EXPIRATION DATES ARE AT 24:00

**Bureau of Prisons
Health Services
Medical Duty Status**

Reg #: 15653-089

Inmate Name: VANDEN HEUVEL, RONALD H

Housing Status

☐ confined to the living quarters except ☐ meals ☐ pill line ☐ treatments Exp. Date: _____
☐ on complete bed rest: ☐ bathroom privileges only Exp. Date: _____
☒ cell: ☐ cell on first floor ☐ single cell ☒ lower bunk ☐ airborne infection isolation Exp. Date: 04/24/2020
☐ other: _____ Exp. Date: _____

Physical Limitation/Restriction

☐ all sports Exp. Date: _____
☐ weightlifting: ☐ upper body ☐ lower body Exp. Date: _____
☐ cardiovascular exercise: ☐ running ☐ jogging ☐ walking ☐ softball Exp. Date: _____
☐ football ☐ basketball ☐ handball ☐ stationary equipment
☐ other: _____ Exp. Date: _____

May have the following equipment in his / her possession:

| Equipment | Start Date | End Date | Return Date |
|-------------------------------|------------|----------|-------------|
| Alternate Institutional Shoes | 04/23/2019 | | |
| diabetic soft shoes | | | |

Work Restriction / Limitation:

Cleared for Food Service: NO

Restriction

No Work Requiring Safety Shoes

Expiration Date
04/24/2020

Comments: care level 3

Rice, Benjamin MD, CD

04/24/2019

Health Services Staff

Date

Inmate Name: VANDEN HEUVEL, RONALD H Reg #: 15653-089 Quarters: 003

ALL EXPIRATION DATES ARE AT 24:00