

PATRICK D. ROBBINS (CABN 152288)
Acting United States Attorney

MARTHA BOERSCH (CABN 126569)
Chief, Criminal Division

GALEN A. PHILLIPS (CABN 307644)
Assistant United States Attorney

450 Golden Gate Avenue, Box 36055
San Francisco, California 94102-3495
Telephone: (415) 436-7110
Facsimile: (415) 436-7234
Email: galen.phillips@usdoj.gov

Attorneys for United States of America

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

UNITED STATES OF AMERICA,	)	CASE NO: CR-24-00292-PCP
	)	
Plaintiff,	)	
	)	
v.	)	CERTIFICATE OF SERVICE
	)	
CASSIE WILL-DARNALL,	)	
	)	
Defendant.	)	
	)	
	)	

The undersigned hereby certifies that she is an employee in the Office of the United States Attorney for the Northern District of California and is a person of such age and discretion to be competent to serve papers. The undersigned further certifies that she caused a copy of

- **APPLICATION OF THE UNITED STATES FOR PRELIMINARY ORDER OF FORFEITURE.**
- **PROPOSED PRELIMINARY ORDER OF FORFEITURE.**
- **DECLARATION OF JENNIFER BARNARD AND EXHIBITS.**
- **DECLARATION OF AUSA GALEN PHILLIPS AND EXHIBITS.**

//

//

1 to be served this date via United States First-Class Mail and Priority Mail International delivery upon the
2 person(s) below at the place(s) and address(es) which is the last known address(es):

3 Serenity Enterprises Family Limited Partnership
4 1712 Pioneer Ave #120
5 Cheyenne, WY 82001

Plato Global Ventures, LLC
556 Main Street, Charleston,
Nevis West Indies

6 I declare under penalty of perjury under the laws of the United States of America that the
7 foregoing is true and correct to the best of my knowledge.

8 Executed this 17th day of April 2025, at San Francisco, California.

9 _____/s/
10 YAQIONG FAN
11 FSA Paralegal/Asset Forfeiture Unit
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28