MOEEL LAH FAKHOURY LLP
Hanni M. Fakhoury (State Bar No. 252629)
2006 Kala Bagai Way, Suite 16
Berkeley, CA 94704
Telephone: (510) 500-9994
Email: hanni@mlf-llp.com

Attorneys for Third Party Claimant Sandra Will

IN THE UNITED STATES DISTRICT COURT

FOR THE NORTHERN DISTRICT OF CALIFORNIA

SAN JOSE DIVISION

| | |
|---|---|
| UNITED STATES OF AMERICA,<br>Plaintiff,<br>v.<br>CASSIE WILL-DARNALL,<br>Defendant.<br><br>SANDRA WILL,<br>Third Party Claimant. | **Case No.:** 5:24-CR-00292-PCP<br><br>**DECLARATION OF SANDRA WILL IN SUPPORT OF AMENDED PETITION FOR ANCILLARY PROCEEDING** |

I, Sandra Will, hereby declare as follows:

1. I am making the declaration of my own free will and based on my best knowledge and recollection.
2. I am 86 years old and a retired public school teacher.
3. The defendant in this criminal case, Cassie Will-Darnall, is my daughter and only child.
4. In 1991, my husband, Robert Will, who was also a public school teacher, and I purchased the home at 306 Los Gatos Almaden Way, Los Gatos, CA 95032, Santa Clara County, APN 527-46-002.

5. We originally rented the house to tenants after we bought it. In 1995, we moved into the house and I have lived there full time since.
6. Since Robert and I purchased the home, it has always been under our control. We have never sold the house, though we did change the title a few times.
7. In 1995, we changed the title to put the house in the name of a trust we established.
8. In 2004, I am informed that the title was placed in the name of a company called Westward Properties, Inc. for about a month. I do not have any memory or recollection of why the title was changed or what Westward Properties was.
9. At some point, the title was placed back in the name of Robert and I in 2004.
10. Robert passed away in 2005; after his death, I became the sole owner and title holder of the house.
11. In 2012, Cassie got married. She and her then-wife purchased a home at 111 Belwood Gateway, Los Gatos CA 95032, Santa Clara County, APN 527-31-019.
12. Cassie, her then-wife, and their child—my grandson—lived in that house after it was purchased.
13. In 2016, Cassie and her wife separated. In the separation, I was told that Cassie and her ex agreed that Cassie would get the house and buy out her ex's share of the home.
14. At the time of the divorce proceedings, Cassie asked me to help her buy out her ex's share of the home at Belwood Gateway.
15. Sometime in April or May 2016, I can't remember exactly when, I took out a home equity line of credit ("HELOC") of approximately $500,000 from Bank of America secured by my Los Gatos Almaden home.
16. I gave about $550,000 to obtain the equity in the Belwood Gateway house; I believe $400,000 came from the HELOC and $150,000 came from cash I had saved. Cassie gave the money to her ex to buy out her share of the house at Belwood Gateway. I cannot find records that show the exact amount paid, or how I gave Cassie the money to pay her ex.
17. Sometime later, I learned Cassie may have refinanced the mortgage on the house at Belwood Gateway and took out a loan in her name alone.

18. In January 2018, I applied for a $1 million loan with Bank of America, to pay off the loan Cassie had taken on the Belwood Gateway house. The bank issued me a loan secured by my Los Gatos Almaden home.

19. Before I received any proceeds from the $1 million loan, Bank of America repaid the HELOC, which by then had a balance of approximately $488,000. Bank of America also repaid another loan I had on another property I owned with a balance of approximately $163,000. Bank of America ended up giving me approximately $348,000 in cash. I gave that cash, along with other money I had saved, to Cassie to pay off the existing loan on the Belwood Gateway property and the title was transferred to me.

20. In all, I gave Cassie well over $1 million: I bought out her ex's share of the Belwood Gateway house and then paid off her remaining mortgage balance on that same property.

21. To document the multiple loans I made to Cassie, she signed a promissory note in the amount of $1 million. We agreed that she would make rent payments roughly equal to the amount I had to pay Bank of America monthly. She also placed a deed of trust on the Belwood Property.

22. From January 2018 to March 2020, Cassie sent me a check every month of approximately $4,600, which was roughly what I had to pay Bank of America every month for the $1 million loan. In essence, Cassie was my tenant and I was her landlord.

23. Cassie lives at the house in 111 Belwood Gateway to this day. Because she splits custody of her son with her ex, my grandson also lives at 111 Belwood Gateway at least part of the time.

24. In May 2020, Cassie sent me a check that covered the outstanding balance on the Bank of America loan. I asked her where she got the money and she told me she got a loan. I did not ask her any further questions about it.

25. I have since learned that Cassie obtained money through fraud. It is an understatement to say how deeply disappointed and mad I am at Cassie for that foolish decision.

26. I would not accept money from Cassie, or anyone else, that I knew had been obtained by fraud or other criminal activity.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on November 11, 2025, in Los Gatos, California.

*/s Sandra Will*
SANDRA WILL