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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, Plaintiff, v. CASSIE WILL-DARNALL, Defendant. SANDRA WILL, Third Party Claimant.	**Case No.:** 5:24-CR-00292-PCP **DECLARATION OF HANNI M. FAKHOURY IN SUPPORT OF AMENDED PETITION FOR ANCILLARY PROCEEDING**

I, Hanni M. Fakhoury, hereby declare as follows:

1. I am an attorney licensed to practice in California and admitted in the Northern District of California. I represent Sandra Will in this matter.
2. Attached as Exhibit A is a property detail report for 306 Los Gatos Almaden Road, Los Gatos, California 95032-4006. I obtained this document from Assistant Federal Public Defender Varell Fuller, who represents defendant Cassie Will-Darnall, and who, I am informed, obtained this document from the government in discovery.

3. Attached as Exhibit B is a property detail report for 111 Belwood Gateway, Los Gatos, California 95032-5138. I obtained this document from Mr. Fuller, who I am informed, obtained this document from the government in discovery.
4. Attached as Exhibit C is a petition for divorce filed by Cassie Will-Darnall in Santa Clara County Superior Court. I obtained this document from Mr. Fuller, who I am informed, obtained this document from the government in discovery.
5. Attached as Exhibit D is a judgment of dissolution in the divorce case brought by Cassie Will-Darnall in the Santa Clara County Superior Court. I obtained this document from Mr. Fuller, who I am informed, obtained this document from the government in discovery.
6. Attached as Exhibit E is a declaration of custodian of records from Bank of America, as well as records from Bank of America, concerning a bank account in the name of Sandra Will. I obtained this document from Mr. Fuller, who I am informed, obtained this document from the government in discovery.
7. I calculated that the home at 306 Los Gatos Almaden is worth $2 million by approximating the average of the estimates from the property websites Zillow ($1,986,300.00) and Redfin ($2,035,113.00), which totaled $2,010,706.50 as of November 11, 2025.
8. I calculated that the home at 111 Belwood Gateway is worth $2.5 million by approximating the estimate from the property website Redfin, which estimates a value of $2,540,120 for the house as of November 11, 2025. I could not find an estimate of the property on Zillow.

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 Clayton, California.

s/ Hanni M. Fakhoury
HANNI M. FAKHOURY