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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN JOSE DIVISION

UNITED STATES OF AMERICA, Plaintiff, v. CASSIE WILL-DARNALL, Defendant.	CASE NO. CR 24-00292 PCP UNITED STATES' BILL OF PARTICULARS FOR FORFEITURE OF PROPERTY

The United States of America, by and through Ismail J. Ramsey, United States Attorney for the Northern District of California, and David B. Countryman, Assistant United States Attorney, hereby files the following Bill of Particulars for Forfeiture of Property.

The indictment in the above-captioned case seeks forfeiture of property pursuant to 18 U.S.C. § 981(a)(1)(C), 18 USC § 982(a)(2), and 28 U.S.C. § 2461(c) and the procedures outlined in Rule 32.2 of the Federal Rules of Criminal Procedure and 21 U.S.C. § 853. The United States hereby provides further notice that, pursuant to the Indictment's forfeiture allegations, the United States seeks forfeiture of the following property:

- Real Property located at 111 Belwood Gateway, Los Gatos CA 95032, Santa Clara County, APN 527-31-019;

- Real Property located at 306 Los Gatos Almaden Rd., Los Gatos, CA 95032, Santa Clara County, APN 527-46-002; and
- All funds up to $625,952.60 on deposit in a Vanguard account ending in -6846, held in the name of Alternative Health Services Inc, and all interest accrued since seizure of those funds.

DATED: 08/19/2024

Respectfully submitted,

ISMAIL J. RAMSEY
United States Attorney

_____/S/_____
DAVID B. COUNTRYMAN
Assistant United States Attorney