UNITED STATES OF AMERICA

NORTHERN DISTRICT OF CALIFORNIA

SAN JOSE DIVISION

UNITED STATES OF AMERICA, Plaintiff, v. CASSIE WILL-DARNALL, Defendant.	Case No. CR-24-00292-PCP **[PROPOSED] PRELIMINARY ORDER OF FORFEITURE**

Having considered the application for a preliminary order of forfeiture filed by the United States, and the guilty plea entered on January 15, 2025, wherein the defendant Cassie Will-Darnall agreed to forfeiture, and good cause appearing,

IT IS HEREBY ORDERED that the following property is forfeited to the United States pursuant to Title 18, United States Code, Section 981(a)(1)(C), Title 28, United States Code, Section 2461(c) and the procedures outlined in Rule 32.2 of the Federal Rules of Criminal Procedure and Title 21, United States Code, Section 853:

- 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;

- 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; and
- A forfeiture money judgment in the amount of $1,406,594.56.

IT IS FURTHER ORDERED that the United States, through its appropriate agency, shall seize the forfeited property forthwith and publish for at least thirty days on the government website www.forfeiture.gov a notice of this Order, notice of the government's intent to dispose of the property in such manner as the Attorney General may direct, and notice that any person, other than the defendant, having or claiming a legal interest in the property must file a petition with the Court and serve a copy on government counsel within thirty (30) days of the final publication of notice or of receipt of actual notice, whichever is earlier;

IT IS FURTHER ORDERED that, the government may conduct discovery, in order to identify, locate, or dispose of property subject to forfeiture, in accordance with Rule 32.2(b)(3) of the Federal Rules of Criminal Procedure;

IT IS FURTHER ORDERED that the Court will retain jurisdiction to enforce the Preliminary Order of Forfeiture, and to amend it as necessary, pursuant to Federal Rule of Criminal Procedure 32.2(e).

IT IS FURTHER ORDERED that, pursuant to Rule 32.2(b)(4) of the Federal Rules of Criminal Procedure, this Preliminary Order of Forfeiture shall become final as to the defendant at the time of sentencing and shall be made part of the sentence and included in the judgment.

IT IS SO ORDERED this _____ day of _____, 2025.

_____
HON. P. CASEY PITTS
United States District Judge