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
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, Plaintiff, v. CASSIE WILL-DARNALL, Defendant.	CASE NO. CR-24-00292-PCP **DECLARATION OF SPECIAL AGENT BARNARD**

I, Jennifer C. Barnard, declare and state as follows:

1. I am a Special Agent with the Federal Bureau of Investigation ("FBI"), a position I have held since October 2007. I am a Certified Public Accountant and prior to my employment with the FBI, worked as an accountant.

2. The facts set forth in this declaration are based on my personal knowledge and information I received from other law enforcement personnel, or my review of documents and business records related to this investigation. I make this declaration for the limited purpose of supporting the application of the United States for a preliminary order of forfeiture. This declaration does not include everything I know about the investigation.

3. As part of this investigation, the FBI obtained financial records for Cassie Will-Darnall ("Will-Darnall"), entities associated with Will-Darnall, and Sandra Will ("Will"), including the following accounts: a Bank of America account in Will's name with an account number ending in 9108 (the "9108 Account"), a Wells Fargo account in the name of Rosswood LLC with an account number ending in 7528 (the "7528 Account"), a Wells Fargo account in the name of Soda Springs LLC with an account number ending in 4912 (the "4912 Account"), a Vanguard account held in the name of Will-Darnall associated with an account number ending in 8205 (the "8205 Account"), and a Vanguard account held in the name of Alternative Health Service Inc associated with an account number ending in 6846 (the "6846 Account").

4. On or about February 2, 2018, Will obtained a cashier's check in the amount of $607,629.02 to be paid to the order of PLM Lender Services Inc. drawn on the 9108 Account. Of the $607,629.02, a portion of the funds came from a loan that Will obtained from Bank of America in January of 2018.

5. Per Wyoming Secretary of State records, Serenity Enterprises Family Limited Partnership is a Limited Partnership affiliated with Will-Darnall.

6. A Limited Partnership Certificate of Limited Partnership filed with the Wyoming Secretary of State on July 18, 2012, lists Will-Darnall as the general partner of Serenity Enterprises Family Limited Partnership.

7. A 2019 Limited Partnership Annual Report filed with the Wyoming Secretary of State on

or about August 6, 2019, was signed in Will-Darnall's name.

8. Based on a review of Will-Darnall's bank records obtained during the course of the investigation, there does not appear to be evidence that Will-Darnall received funds from Serenity Enterprises Family Limited Partnership or Serenity Family Limited Partnership during the period of interest.

9. Based on a review of Will-Darnall's bank records obtained during the course of the investigation, there does not appear to be evidence that Serenity Enterprises Family Limited Partnership or Serenity Family Limited Partnership received funds from Will-Darnall during the period of interest.

10. I have reviewed records appearing to relate to Plato Global Ventures LLC, stating it is a Nevis LLC affiliated with Will Darnall.

11. Based on a review of Will-Darnall's bank records obtained during the course of the investigation, there does not appear to be evidence that Will-Darnall received funds from Plato Global Ventures LLC.

12. Based on a review of Will-Darnall's bank records obtained during the course of the investigation, there does not appear to be evidence that Plato Global Ventures LLC received funds from Will-Darnall.

13. Will-Darnall fraudulently applied for two Economic Injury Disaster Loans ("EIDLs") on or about March 31 and April 11, 2020, respectively. Those EIDLs were declined.

14. Will-Darnall fraudulently applied for a Paycheck Protection Program ("PPP") loan on or about April 1, 2020, seeking a loan of $3,312,500. That loan was declined. Will-Darnall fraudulently applied for a PPP loan on or about April 3, 2020, seeking a loan of $3,312,500, using the information she submitted on April 1, 2020, with minor revisions. That loan was also declined.

15. Will-Darnall has pleaded guilty to fraudulently obtaining two PPP loans in the amounts of $968,989 received on or about June 4, 2020 and $1,864,565 received on or about July 22, 2020, the proceeds of which have been traced using the lowest intermediate balance rule ("LIBR").

16. On or about June 9, 2020, Will-Darnall transferred $938,000 from the 7528 Account to the 4912 Account. Using LIBR, the $938,000 transferred to the 4912 Account was composed entirely of funds directly traceable to the first count to which Will-Darnall has pleaded guilty.

17. On or about June 15, 2020, Will-Darnall wrote a check to Will drawn on the 4912 Account in the amount of $971,504.21. Written in the memo line of the check was "111 Bel payoff". Using LIBR, $746,372.98 of the check amount was composed of funds directly traceable to the first count to which Will-Darnall pleaded guilty.

18. The 971,504.21 check was deposited into Will's 9108 Account. On or about June 22, 2020, a payment of $972,094.93 was made from the 9108 Account to a mortgage account in Will's name at Bank of America ending in 6661. Using LIBR, the $972,094.93 payment included the $746,372.98 in funds directly traceable to the first count to which Will-Darnall pleaded guilty.

19. On or about November 10, 2020, Will-Darnall transferred $1,600,000 from the 7528 Account to the 8205 Account. On or about November 17, 2020, Will-Darnall transferred $230,000 from the 7528 Account to the 8205 Account. Pursuant to LIBR, except for $54.15, all of the $1,830,000 included in these two transfers was directly traceable to the second count to which Will-Darnall pleaded guilty.

20. On or about November 27, 2020, Will-Darnall transferred $100,000 from the 4912 Account to the 8205 Account. Pursuant to LIBR, all of the $100,000 included in this transfer was directly traceable to the first count to which Will-Darnall pleaded guilty.

21. On or about February 2, 2021, Will-Darnall transferred $1,876,616.41 from the 8205 Account to the 6846 Account. Pursuant to LIBR, of the $1,876,616.41 transferred to the 6846 Account, all of it constituted funds directly traceable to the two counts to which Will-Darnall pleaded guilty.

22. Between on or about February 2, 2021, and on or about May 31, 2023, funds were withdrawn from the 6846 Account and transferred to the 4912 Account in increments ranging from $3,000 to $400,000. Pursuant to LIBR, Will-Darnall transferred approximately $1,027,000 in fraud proceeds from the 6846 Account to the 4912 Account. Will-Darnall dissipated some of those funds at restaurants and transfers to a cryptocurrency exchange and through purchases of various things including items from Amazon and airlines.

23. Pursuant to LIBR, Will-Darnall transferred approximately $489,000 in loan proceeds from the 4912 Account back into the 6846 Account.

24. As of on or about May 31, 2023, the 6846 Account had a balance of $625,952.60.

25. Using LIBR, the entirety of the $625,952.60 in the 6846 Account on or about May 31, 2023, consisted of proceeds directly traceable to the two counts to which Will-Darnall has pleaded guilty.

26. Attached hereto are true and correct copies, excluding Bates-stamp numbering and redactions, when applicable, of records obtained during the course of the investigation or records pulled from publicly available sources:

27. Attached hereto as Exhibit A is a true and correct copy of a promissory note dated January 24, 2018.

28. Attached hereto as Exhibit B is a true and correct copy of a deed of trust dated January 24, 2018.

29. Attached hereto as Exhibit C is a true and correct copy of an affidavit dated January 24, 2018.

30. Attached hereto as Exhibit D is a true and correct copy of a real estate schedule dated January 24, 2018.

31. Attached hereto as Exhibit E is a true and correct copy of a closing statement dated January 23, 2018.

32. Attached hereto as Exhibit F is a true and correct copy of an outgoing wire form dated January 29, 2018.

33. Attached hereto as Exhibit G is a true and correct copy of an account statement for the 9108 Account.

34. Attached hereto as Exhibit H is a true and correct copy of an image of a cashier's check.

35. Attached hereto as Exhibit I is a true and correct copy of a promissory note dated February 7, 2018.

36. Attached hereto as Exhibit J is a true and correct copy of a deed of trust dated February 7, 2018.

37. Attached hereto as Exhibit K is a true and correct copy of an interspousal transfer deed dated June 10, 2016.

38. Attached hereto as Exhibit L is a true and correct copy of a deed of reconveyance dated

February 16, 2018.

39. Attached hereto as Exhibit M is a true and correct copy of a civil complaint dated November 19, 2018.

40. Attached hereto as Exhibit N is a true and correct copy of an abstract of judgment dated on or about June 8, 2022.

41. Attached hereto as Exhibit O is a true and correct copy of a deed of trust dated February 26, 2019.

42. Attached hereto as Exhibit P is a true and correct copy of a deed of trust dated July 26, 2016.

43. Attached hereto as Exhibit Q is a true and correct copy of a deed of trust dated June 27, 2019.

44. Attached hereto as Exhibit R is a true and correct copy of a line of credit agreement dated July 21, 2016.

45. Attached hereto as Exhibit S is a true and correct copy of a deed of trust dated August 19, 2013.

46. Attached hereto as Exhibit T is a true and correct copy of a quitclaim deed dated August 14, 2019.

47. Attached hereto as Exhibit U is a true and correct copy of a deed of trust dated September 25, 2019.

48. Attached as hereto as Exhibit V is a true and correct copy of a borrower application form dated May 20, 2020.

49. Attached hereto as Exhibit W is a true and correct copy of an account statement for the 7528 Account.

50. Attached hereto as Exhibit X is a true and correct copy of a business account application for the 7528 Account.

51. Attached hereto as Exhibit Y is a true and correct copy of an account statement for the 4912 Account.

52. Attached hereto as Exhibit Z is a true and correct copy of a business account application

for the 4912 Account.

53. Attached hereto as Exhibit AA is a true and correct copy of a check image.

54. Attached hereto as Exhibit BB is a true and correct copy of an account statement for the 9108 Account.

55. Attached hereto as Exhibit CC is a true and correct copy of a quitclaim deed dated June 20, 2020.

56. Attached hereto as Exhibit DD is a true and correct copy of a promissory note dated February 7, 2018.

57. Attached hereto as Exhibit EE is a true and correct copy of an account statement for a home loan account in the name of Sandra Will and affiliated with an account number ending in 6661.

58. Attached hereto as Exhibit FF is a true and correct copy of a borrower application form dated July 12, 2020.

59. Attached hereto as Exhibit GG is a true and correct copy of a lender's transcript of account dated July 21, 2020.

60. Attached hereto as Exhibit HH is a true and correct copy of an account statement for the 7528 Account.

61. Attached hereto as Exhibit II is a true and correct copy of an account application for the 8205 Account.

62. Attached hereto as Exhibit JJ is a true and correct copy of an account statement for the 8205 Account.

63. Attached hereto as Exhibit KK is a true and correct copy of an account statement for the 6846 Account.

64. Attached hereto as Exhibit LL is a true and correct copy of an account application for the 6846 Account.

/ / /

/ / /

65. Attached hereto as Exhibit PP is a true and correct copy of a certificate of incumbency and resignation of organization rights.

I swear under penalty of perjury that the foregoing is true and correct.

Executed on: April 9, 2025

/s/
JENNIFER C. BARNARD
Special Agent
Federal Bureau of Investigation