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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. SANDRA WILL, Third Party Petitioner.	CASE NO. CR-24-00292-PCP **DECLARATION OF SPECIAL AGENT HULING**

I, Angel D. Huling, declare and state as follows:

1. I am a Special Agent with the Office of Inspector General, a position I have held since September 2021.

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 motion to dismiss or for summary judgment of the United States. This declaration does not include everything I know about the investigation.

3. Attached hereto as Exhibit PP is a true and correct copy, excluding redactions, of a Form 1099-K listing Cassie Will-Darnall as the payee for tax year 2021.

4. Attached hereto as Exhibit QQ is a true and correct copy of an email dated February 21, 2022.

5. Attached hereto as Exhibit RR is a true and correct copy of a document provided in response to a grand jury subpoena served on Slade and Company, which provided tax services to Cassie Will-Darnall.

6. Attached hereto as Exhibit UU is a true and correct copy of a quitclaim deed dated January 13, 2004.

7. Attached hereto as Exhibit VV is a true and correct copy of a quitclaim deed dated May 13, 2004.

8. Attached hereto as Exhibit WW is a true and correct copy of a quitclaim deed dated July 28, 2004.

9. Attached hereto as Exhibit ZZ is a true and correct copy of an entity registration statement retrieved from Nevada's Business Portal.

10. Attached hereto as Exhibit AAA is a true and correct copy of an entity registration statement retrieved from Nevada's Business Portal.

11. Attached hereto as Exhibit BBB is a true and correct copy of a subpoena return provided by First American Title Company.

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12. Attached hereto as Exhibit CCC is a true and correct copy of an email dated January 10, 2024.

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

Executed on: July 25, 2025

/s/
ANGEL D. HULING
Special Agent
Office of Inspector General