Exhibit A

MEMORANDUM

FEDERAL PUBLIC DEFENDER, N.D. CAL
TELEPHONE: (408) 291-7753

To: Varell L. Fuller, Assistant Federal Public Defender
From: Amanda Merfeld, LCSW
Mitigation Specialist
Subject: United States v. Cassie Will-Darnall 24-CR-00292-PCP
Date: August 25, 2025

Contact: Sandra Will, Cassie's Mother

I spoke with Sandra Will over the phone on August 14, 2025. I identified myself as a mitigation specialist with the Federal Public Defender. I explained the purpose of my call was to gather information regarding Cassie Will-Darnall. She agreed to speak with me and relayed the following information.

Cassie was born in Santa Clara, California and did not have any birth complications. Cassie was an energetic child and was involved in a lot of activities. She loved to go to the park and play. She was a star in school and did well academically. Cassie graduated from high school. She pursued higher education and went to West Valley college and San Diego State University for her bachelor's degree. She got her master's in business administration from Santa Clara University.

Cassie has always been dedicated to her work, and she likes to own her own businesses and call the shots. She has wonderful employees who are very loyal and helpful. She describes Cassie as being well liked by her employees and very reliable. Cassie owns Sylvan Learning Center location at one point. She believes Cassie owned the stores from 1997 to 2002. Sandra does not recall how many stores she oversaw. Cassie does well with guiding parents and helping them understand how to best support their child.

Cassie has a son named [redacted] and she believes he is around 11 years old but she is not 100% sure. Cassie has been a head coach to [redacted] little league baseball team. [redacted] is happily involved in sports including basketball, football, baseball, and soccer. Cassie played a lot of sports, growing up and she is really helping him learn the ropes. Cassie feels the best way to keep [redacted] out of trouble is to put him into sports. He will age out little league when he is 12 years old.

Cassie and her ex-wife Sherri adopted him via embryo transfer. Sherri carried the pregnancy of [redacted]. Sherri and Cassie are on good terms as far as Sandra knows. [redacted] is a good boy, and she knows both of his mothers love him very much. It has been an adjustment since Sherri and Cassie got divorced, they share 50/50 custody. [redacted] moves twice a week to go between his mothers but seems to adjust well, he accepts it, and is used to it at this point. To her

knowledge that divorce happened in 2016, when [redacted] was two years old, but she is not for certain. Sandra feels like Cassie and Sherri are navigating co-parenting as best they can.

Sandra describes Cassie as the best mother. She often takes him on trips including a trip to Boston to see the Green Machine Baseball stadium, Washington D.C., and Baltimore. Cassie and her son have a tradition of going to the all-star games in Arizona. She goes above and beyond to be there for her son. She also does broadcast at [redacted] games on time.

Cassie manages her mental health well and does not have any mental health diagnoses of Sandra's knowledge.

Sandra got married to Cassie's father Robert Will in 1967 and they had Cassie in 1971; she is an only child. Both were schoolteachers. He got sick and passed away from enlarged heart complications. Sandra does not recall the specific year but believes Cassie was in her 20's or 30's when he passed away. Cassie had a close relationship with her father. After Robert passed away Sandra has not remarried. Cassie supports her mother's happiness, and she has special friends at times, who Cassie has met over the years but no other significant other that has played a father like role in Cassie's life.

Leading up to Cassie's offense she was dealing with the divorce, had her child, and her business went down. She put all her money in it. People in Cassie's business were suing her for a lot of money, and she wanted to defend herself and Sandra thinks that is why she borrowed so much money. She also had the threat of losing the house at the time. She felt like she lost it all. Sandra went to Bank of America and asked for a loan, and she recalls Sherri pounding her for the money. They eventually got the loan. Cassie was scrambling for money, and Sandra cannot imagine the emotional toll it was taking to have to scramble like that while taking care of her son. Sandra felt that Cassie told her about the charges way too late and she felt it came totally out of left field.

Cassie is very supportive of Sandra. She drops everything in a heartbeat to come to help her. Sandra lives alone in a house close by to Cassie. Sandra deals with high blood pressure and macular degeneration in one eye, but it will escalate to another eye soon so her eyesight is deteriorating. She also has a hearing aid. Cassie comes over to cooks, works in the yard, and cleans for Sandra. Sandra cannot do what she used to do so Cassie comes over to help.

Cassie's son [redacted] and Sandra would have an incredibly hard time if Cassie were to become incarcerated. Sandra needs her to survive and does not know what she would do without her.

Sandra wants to attend Cassie's sentencing, but she said Cassie told her not to come. She said she is going to continue to talk to Cassie about it because she does want to be there. I told her if she had any questions or needed additional information about the sentencing, she is welcome to contact me or the team with any questions.

Sandra had nothing further to add at this time. I asked her if our office can contact her in the future if we have questions, and she said yes. I thanked her for her time and concluded the interview.

Respectfully Submitted,



Amanda Merfeld, LCSW
Mitigation Specialist

MEMORANDUM

FEDERAL PUBLIC DEFENDER, N.D. CAL
TELEPHONE: (408) 291-7753

To: Varell L. Fuller, Assistant Federal Public Defender
From: Amanda Merfeld, LCSW
Mitigation Specialist
Subject: United States v. Cassie Will-Darnall 24-CR-00292-PCP
Date: August 25, 2025

Contact: Kari Oliver, Cassie's Friend

I spoke with Kari Oliver over the phone on August 21, 2025. I identified myself as a mitigation specialist with the Federal Public Defender. I explained the purpose of my call was to gather information regarding Cassie Will-Darnall. She agreed to speak with me and relayed the following information.

Kari has known Cassie for about five years and met her through their youngest sons going to the same school. Kari is married to Justin Oliver. Kari considers her and Justin to be close family friends with Cassie. Kari's son and Cassie's son would have playdates together often. Cassie is an attentive mother, intentional, very loving, and understanding. Cassie is dependable by taking her son [redacted] to school, taking him to various sports practices, and overall, always showing up on time. She is reliable and honest. Whether it is a baseball practice or school event she is always willing to let the whole team or class come over to go to the swimming pool across the street. Kari has always appreciated that Cassie tries to be as inclusive as possible.

Kari has two older daughters in addition to her son and Cassie is always intentional about including them as well in activities. Cassie goes out of her way to make Kari's children feel comfortable and that has meant a lot to Kari.

Kari has met Cassie's ex-wife, Sherri. Kari knew them when they were together romantically for part of their relationship. She describes Sherri and Carrie as good co-parents, but things have gotten trickier recently since Cassie has been dealing with her federal case. Kari is friends with both, and she has purposefully asked to be left out of any relationship issues between them. Cassie's relationship with Sherri is not something she talks to Cassie about.

Kari has never had concerns related to mental health or substance use with Cassie.

Kari describes Cassie as a "good community person." Cassie goes out of her way to bring a lot of people together. She is always up to entertain the kids and take them to go do something.

Cassie is always positive and level-headed. Kari can count on her for having good energy and someone that is optimistic, trustworthy, confident, empathetic and positive.

Cassie's federal case came out of nowhere and completely surprised her.

Cassie has a healthy and close relationship with her mother. Cassie is heavily involved in helping her mother. A few years ago, Cassie woke up at 2am to go over to her mother's house to help her when she needed something. Kari does not know what specifically her mother needed help with. Kari believes Cassie's mother would greatly suffer if she became incarcerated because she has no other family to support her.

Kari knows Cassie has done therapy in the past and believes she is enrolled in therapy currently. She is not aware of specific therapy providers are for how long she has been involved in therapy. Sharing a child is hard and Kari thinks Cassie would benefit from talking about the dynamics of her co-parenting with her ex-wife and to overall discuss different things she has been through in her life.

Kari intends on attending Cassie's sentencing on September 3, 2025.

Kari had nothing further to add at this time. I asked her if our office can contact her in the future if we have questions, and she said yes. I thanked her for her time and concluded the interview.

Respectfully Submitted,



Amanda Merfeld, LCSW
Mitigation Specialist

MEMORANDUM

FEDERAL PUBLIC DEFENDER, N.D. CAL
TELEPHONE: (408) 291-7753

To: Varell L. Fuller, Assistant Federal Public Defender
From: Amanda Merfeld, LCSW
Mitigation Specialist
Subject: United States v. Cassie Will-Darnall 24-CR-00292-PCP
Date: August 25, 2025

Contact: Justin Oliver, Cassie's Friend

I spoke with Justin Oliver over the phone on August 22, 2025. I identified myself as a mitigation specialist with the Federal Public Defender. I explained the purpose of my call is to gather information regarding Cassie Will-Darnall. He agreed to speak with me and relayed the following information.

Justin and his wife Kari have been family friends with Cassie for a few years and met through their children. Justin describes Cassie as a "hands-on mom." Cassie is willing to drop anything for her son and often would go with her son [redacted] to baseball games, specifically San Francisco Giants games. [redacted] plays baseball and is a big fan of the sport. Cassie would bring [redacted] to baseball games early to make sure he got autographs and would wait hours on end to make sure her son got what he wanted. Cassie is intentional with putting herself in situations to creates memories with her son and describes [redacted] as a "lucky kid" to have Cassie as his mother. Cassie does everything to put [redacted] first and is a "really, really good mom."

Cassie does a good job balancing being a single mother and maintaining a good relationship with her ex-wife, Sherri. Cassie always has things to do when she has her son [redacted]. She is a great multitasker and is always there to support him emotionally. To Justin's knowledge, Cassie has been divorced for quite a while but does not know the exact year the divorce occurred. Cassie makes sure not to put [redacted] in between her and her ex-wife Sherri.

Cassie and her ex-wife Sherri's relationship is up and down. He describes them having good stretches and rocky stretches. Justin and his wife Kari have been friends with both for years and they have always been cordial in the presence of one another. Justin and his wife have made it clear to Cassie and Sherri that they will not take sides and do not want to be put in the middle.

When Cassie and Sherri are at a sporting event together you cannot tell they had a past, it does not feel awkward. Even if Cassie and Sherri are not on good terms, Justin and his wife Kari have made it clear they do not want to be put in the middle of their relationship. Cassie

and Sherri have been consistent in respect for the boundaries Justin and his wife have set. Cassie can put aside her differences with Sherri for their son [redacted] and he has never had concerns about the divorce affecting her relationship with her child in a negative manner. [redacted] calls them mom and mommy, he has never heard Cassie say bad things about Sherri and they do not push their own narratives over the other.

Cassie is a caretaker to her mother, Sandra. The rest of Cassie's family is in Connecticut. Subsequently, Sandra is isolated and heavily relies on Cassie for support. [redacted] and her mother are Cassie's main priorities. Cassie has an extremely close relationship with her mother. Cassie has a closer relationship with Justin's wife, so she does not confide in Justin as much as she does in his wife, but he knows her mother is very important to her. Justin is not aware of any specific health conditions Cassie's mother endures. Justin recalls Cassie being over at his and his wife's house hanging out for dinner and then her mom would need something, and Cassie would drop everything to go be there for him. He knows Cassie's mother is older and often experiences hospitalizations and Cassie would leave to go assist her mother. It does not matter where she is at or what she is doing, she will do what she can to help her mother.

Cassie's father passed away, but Justin does not know what year or how he passed.

Cassie also values her relationship with her ex-wife/friend, Esther. Justin does not know when they were married but he knows they were married before he met Cassie. Cassie goes to Esther for support often and sees Esther as a positive influence in her life.

Cassie first told Justin's wife and then he found out about Cassie's charges. Justin recalls Cassie having various business ventures but when she told him and his wife about the charges, he was shocked and did not see it coming. Justin and his wife are here to support Cassie. Cassie never got into detail with Justin about the specifics of the charges. No behavior stood out to Justin leading up to Cassie getting charged with her federal criminal case.

Cassie is an extrovert, somebody that can walk into a room not knowing anybody and become friends with everybody. She's vibrant, she's upbeat, she always has good energy with her. She's somebody that people gravitate towards because she's that person. If Cassie goes into a setting where she doesn't know she will become friends with everybody. Cassie is very warm, extremely reliable, down-to-earth, and inviting. Cassie loves to laugh and that is part of why Justin and wife are such close family friends with her. It is just easy to be Cassie's friend, and you know you can count on her to always be ready to hang out or go to a baseball game.

Justin is not aware of other difficult times Cassie has gone through outside of the divorce. He said his wife would know more. He said he has noticed his wife goes to Cassie when she has a bad day and he knows both can rely on her for support. Cassie is not the type of person you would not hear from for a month; she is always making sure the line of communication is open. She's always there for support when you need her. Cassie is always checking in to make sure my kids, myself, my wife, and my kids are okay.

Cassie would benefit from therapy. Justin is not sure what specific type of therapy she needs

but thinks it would help have more support. Justin describes Cassie as having a good support system.

Justin intends on attending Cassie's sentencing on September 3rd or if he is unavailable, he believes his wife Kari may be able to attend as well.

Justin had nothing further to add at this time. I asked him if we can contact him in the future if we have questions, and he said yes. I thanked him for his time and concluded the interview.

Respectfully Submitted,



Amanda Merfeld, LCSW
Mitigation Specialist

MEMORANDUM

FEDERAL PUBLIC DEFENDER, N.D. CAL
TELEPHONE: (408) 291-7753

To: Varell L. Fuller, Assistant Federal Public Defender
From: Amanda Merfeld, LCSW
Mitigation Specialist
Subject: United States v. Cassie Will-Darnall 24-CR-00292-PCP
Date: August 25, 2025

Contact: Esther Moomjian, Cassie's Friend

I spoke with Esther Moomjian over the phone on August 13, 2025. I identified myself as a mitigation specialist with the Federal Public Defender. I explained the purpose of my call was to gather information regarding Cassie Will-Darnall. She agreed to speak with me and relayed the following information.

Esther has known Cassie for about 25 years. Esther met Cassie through a friend of a friend after she moved from the East Coast to California. There is a 10-year age gap between Cassie and Esther. Esther considers Cassie to be her best and like a sister to her.

Esther describes Cassie as generous, smart, innovative, a solid human being, a good friend, a good daughter, hard worker, open-hearted, and someone who wants everybody to have a good time.

Cassie is a hard worker. She has had many businesses over the years and is constantly reinventing herself. Cassie would start a business and if it did not succeed she would come up with a new idea and surprise everyone with something new. Cassie is not someone who is afraid to put herself out there. Cassie is involved in real estate and education. She has her bachelor's degree and a master's in business administration (MBA).

Esther feels that she has watched Cassie grow up into an incredible human being. Cassie's mother Sandra at the time was around 84 years old and came from a different generation. Sandra is a very successful woman herself financially and did not need money. It is Esther's understanding that Cassie's mother did not know what Cassie was doing for her business, so they were not in cahoots or scheming together. She believes it was solely Cassie's decision based on what was going on with her business at the time.

Cassie's alcohol use at times would impair her but it never affected her from going to work or from being a mother or friend. Esther admits to having her own issues with alcohol but says "who doesn't." She said everyone is going through something and people choose how they

want to cope.

Cassie is her mother's only child and is her mother's best friend. They depend on each other and have a tight bond. Cassie's mother would be absolutely devastated if she had to go somewhere for an extended period. Cassie's mother is old school, and she doesn't talk about her feelings and emotions, but she knows losing Cassie would impact her greatly if she became incarcerated. Cassie's mother has macular degeneration and her eyesight is deteriorating. Esther believes she has been dealing with this condition for about 6 months. If her mother is highly stressed and worried, like about Cassie's legal situation, it could escalate the issues with her vision. Her mother also has anxiety and blood pressure issues. Esther is adamant Cassie's mother needs Cassie to survive. Cassie takes her mother to the doctor's appointments and the Emergency Room (ER). To Esther's knowledge Cassie's mother must go to the ER quite often but she is unsure of what particular medical problems prompted these visits. Cassie's mother is not quite at the stage of needing a full-time caregiver, but it could quickly change overnight and without Cassie she would have nobody to care for her.

Cassie had sepsis in November 2024 from a hip replacement. Cassie went to Kaiser several times and they did not believe the severity of her symptoms. She went back nine separate times before she ended up in the ER on the brink of death, then she finally got the medical attention she needed all along. Esther believes she was in the hospital for about 10 days. Getting sepsis changed Cassie's health to a certain level and it took Cassie a lot longer to recover from being sick. Cassie is at the point where she is finally feeling better and she is on medication now to keep her healthy. Esther has never had any behavior concerns and is not aware of Cassie being diagnosed with any mental illness. Cassie has lingering pain from the hip replacement, but it is slowly getting better overtime and is pretty healed at this point. Cassie was someone that was known to have a lot of energy by after this medical situation she tends to get more depleted quickly.

Cassie has 50/50 custody of her son with her ex-wife, Sherri. Esther describes Cassie as an amazing mother. Cassie is intentional in letting her son let out his emotions and holding space for him to process his emotions. Cassie is her son's emotionally safe place. Cassie is firm with not letting him have too much technology. Cassie takes him to baseball games. Cassie attends all his baseball and football games. She volunteers for his sports team and is heavily involved where she can be.

Cassie's ex-wife Sherri tends to cause conflict when it is not necessary. Esther has witnessed some unnecessary conflict between the two of them and considers some of the fights ridiculous. The conflict never escalated to getting physical or "nothing close to domestic violence, just ridiculous fights." Cassie and her ex-wife were together for 12 years and they divorced due to growing apart over time. Esther describes Cassie and Sherri as two different humans who overtime believed in two different things.

Esther is not aware of other significant romantic partners Cassie has had prior to her ex-wife Sherri. Esther feels Cassie is very considerate and intentional about bringing anyone else

around her 11 years old son. Esther considers [redacted] as one of her nephews. Esther knows a kid who experiences divorce can be hard, but he has dealt with it well to her knowledge.

[redacted] goes to St. Mary's for school and Cassie is always there for pick up and is a great communicator. If [redacted] friends did not have a parent available to pick them up Cassie would be the first one to help get the kids from school. Cassie spends a lot of energy on planning and taking care of other kids in addition to her son. She gives unconditional love and always allows people to be people, without judgement.

To Esther's knowledge, at the time of the offense, her business had failed or gone out of business. She would rent apartments to interns in the technology field. She forgets what the business model was but believes tech companies like Apple would have their interns' rent apartments from Cassie but then at one point they cancelled the contracts, which added a lot of stress to Cassie's life. She ran out of money, and she lost her house, lost her money, and she saw the loans as an opportunity to replenish her money.

Esther feels that government officials get away with crime all the time and the double standard is egregious. She feels white men are treated completely different than female business owners. Cassie was not trying to be a criminal mastermind she was trying to make ends meet. This offense was completely out of character for Cassie.

At the time of the offense, she recalls Cassie was really depressed. She recalls Cassie would sleep a lot and her home was messy. Esther and Cassie would get together to drink, cook, and play games. She described it as a "little COVID bubble." Cassie was homeschooling her son and other neighborhood kids during COVID which added stress to her plate. She was homeschooling about three of four other kids at the time. Her son attends school at St. Mary's, going into the sixth grade, and he is no longer homeschooled currently.

Cassie is highly dedicated to raising her son. She gets him out to school every day, gets him dressed, help him with homework, drives him to school, pick friends up from school, makes sure he gets bathed, makes him breakfast, and cooks him dinner. She helps her son get to all his baseball and football games. If he needs medical care, she is always the first one to take him to the doctor. Esther feels like Cassie has a good balance of playful and serious moments with her son. She is working hard at raising a good human being.

Cassie is resilient, strength, forgiveness, compassionate, and always gives people the benefit of doubt.

Esther hopes that the judge is kind, benevolent, forgiving, and compassionate human being towards Cassie. Every human being makes a mistake; there's a backstory of suffering and pain that's going on with that person. The court paints Cassie as a terrible human being when it's literally the opposite. Cassie is very dedicated to her son, and she was going through a hard time during COVID.

Esther plans on attending Cassie's sentencing on September 3, 2025.

Esther had nothing further to add at this time. I asked her if our office could contact her in the future if we have questions, and she said yes. I thanked her for her time and concluded the interview.

Respectfully Submitted,



Amanda Merfeld, LCSW
Mitigation Specialist