Exhibit A

United States v. Cassie Will-Darnall, 5:24-cr-00292-PCP
United States' Sentencing Memorandum

Excerpt of Deposition of Will-Darnall for *Spieker Companies, Inc. v. Rosswood Properties, LLC, et. al.*

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SANTA CLARA

SPIEKER COMPANIES, INC., a California Corporation,

Plaintiff,

vs. NO. 18CV338308

ROSSWOOD PROPERTIES, LLC, a California Limited Liability Company; CASSIE WILL-DARNALL, an individual; LAURA MENICUCCI, an individual, and DOES 1 through 50, inclusive,

Defendants.

DEPOSITION OF CASSIE WILL-DARNALL

APPEARING REMOTELY FROM

LOS GATOS, CALIFORNIA

AUGUST 11, 2021

10:02 A.M.

REPORTED BY:

Celeste J. Silva

CSR No. 10179

APPEARING REMOTELY FROM TULARE COUNTY, CALIFORNIA

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CASSIE WILL-DARNALL

SPIEKER VS. ROSSWOOD PROPERTIES

AUGUST 11, 2021

Celeste J. Silva CSR No. 10179

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Q Are you familiar with a company by the name of Alternative Health Services, Inc.?

A Yes.

Q And what do you associate with the name Alternative Health Services, Inc.?

A There's no association.

Q How are you familiar with the name?

A I know of the company.

Q Okay. What is your understanding of what that company does?

A I don't think it's in business.

Q Okay. So if there was a Secretary of State filing with the -- if there is a filing with the California Secretary of State for a company by the name of Alternative Health Services, Inc., it says that they're doing business out of your address at 111 Bellwood Gateway, Los Gatos.

Do you have any idea why that would be the case?

A Yes.

Q Okay. Why would that be?

A Well, I was going to continue doing business, but I never did because of COVID.

Q So does that mean that you had intended to do business with or as part of Alternative Health Services,

Inc.?

A Possibly.

Q Okay. Do you ever receive any sort of salary from Alternative Health Services, Inc.?

A No.

Q Were you ever employed at any time by Alternative Health Services, Inc.?

A No.

Q Okay. Do you know why that company would have your address listed as part of the Secretary of State filings?

A Like I said, I was going to open to continue to do business, but it didn't work out.

Q Okay. So you were going to do business in the name of Alternative Health Services, Inc. then?

A Right.

Q Okay. And I know you said it didn't work out I'm just going to ask you pretty briefly to explain that, why that didn't work out.

A We went through a pandemic.

Q Can you be a little bit more specific what exactly happened in the pandemic that resulted in you not being able to open up?

A Nobody was traveling.

Q What is the nature of the business of

Alternative Health Services, Inc.?

A There is no business. It was never established.

Q What was the proposed business? What was -- what was their plan for making money as part of that business?

A It never got that far.

Q So what was the purpose of the Secretary of State filing with your address?

MR. VAN NIEKERK: The objection to the question it's been asked and answered.

BY MR. STEPHENSON:

Q You can answer.

Ms. Darnall, do you need me to repeat the question?

A Yes.

Q Okay. If there was no plan, no business plan at all with no idea of how you would make money through Alternative Health Services, Inc., do you know why there's a Secretary of State filing with your name on it?

MR. VAN NIEKERK: Repeat my objection. It's been asked and answered.

THE WITNESS: Yeah, I agree with my attorney. I already answered it.

BY MR. STEPHENSON:

Q Okay. I don't think that you did, but I think that for purposes of this inquiry I don't know if it's necessary to go forward.

Do you have plans at this point to restart that business for Alternative Health Services, Inc.?

MR. VAN NIEKERK: Objection. That was never -- it was never started so she can't restart it.

THE WITNESS: I would hope at some point that I would be employed again, yes.

BY MR. STEPHENSON:

Q Okay.

A But I don't know.

Q Okay.

A At this point I have no intention of doing that.

Q Okay. Fair enough. When you were working with Rosswood Properties, LLC, what was your job title there?

A CEO.

Q And that's from formation of the LLC, correct?

A Yes.

Q And the LLC was formed in approximately 2015; is that accurate?

STATE OF CALIFORNIA)
) ss.
COUNTY OF TULARE)

I, CELESTE SILVA, a Certified Shorthand Reporter of the State of California, do hereby certify:

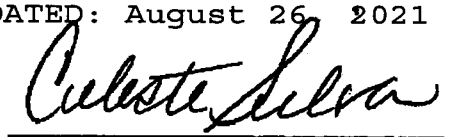
That prior to being examined, the witness in the foregoing proceedings was by me duly sworn to testify to the truth, the whole truth and nothing but the truth;

That said proceedings were taken remotely before me at the time and place therein set forth and were take down by me in shorthand and thereafter transcribed into typewriting under my direction and supervision;

I further certify that I am neither counsel for, nor related to, any parties to said proceedings, nor in anyway interested in the outcome thereof.

In witness whereof, I have hereunto subscribed my name.

DATED: August 26, 2021



CELESTE SILVA, CSR 10179