Exhibit D

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

Memorandum of Interview of Sheri Darnall on August 29, 2025

U.S. SMALL BUSINESS ADMINISTRATION
OFFICE OF INSPECTOR GENERAL
INVESTIGATIONS DIVISION

Prepared by: SA ANGEL HULING
Approved by: (A) ASAC HEATHER MCCORMICK

MEMORANDUM OF INTERVIEW

CASE#: 2023-0024346	**CASE AGENT:** SA ANGEL HULING
CASE TITLE: WILL-DARNALL, CASSIE, ET AL.	
INVESTIGATIVE ASSISTANCE: IA RACQUEL ALVARADO	
DATE: August 29, 2025	

On August 29, 2025, the reporting agent (RA), Angel Huling, Special Agent (SA), U.S. Small Business Administration (SBA), Office of Inspector General (OIG), conducted a telephonic interview of Sheri Darnall (Sheri). Below is a summary of the interview. It is not intended to be a verbatim account and does not memorialize all statements made during the interview. This interview was not recorded.

The RA identified herself to Sheri verbally and advised the purpose of the interview was to discuss the contents of a text message Sheri sent to SA Jennifer Barnard, Federal Bureau of Investigation (FBI) on August 28, 2025.

(Agent's Note: SA Huling contacted Sheri at the request of AUSA Johnny James.)

Sheri said she and her ex-wife, Cassie Will-Darnall (Cassie), attended a counseling session approximately two weeks ago to discuss school related decisions for their son, [redacted]. During the session, their counselor, Jill Schwerin, mentioned Cassie had upcoming legal issues. Sheri asked Cassie what was going on, but Cassie said she didn't want to talk about it.

Sheri conducted a search via the internet and found a Sentencing Memorandum related to Cassie's criminal case on PACER (Public Access To Court Electronic Records). Sheri was alarmed by some of the false information she read in the memorandum and the letters to the court attached to the memorandum.

In the memorandum, it is reported around the time of the offense, Cassie was "embroiled in a contentious divorce involving a $1 million settlement" and "In September 2018, Ms. Will-Darnall's divorce, requiring her to pay her ex-wife $1 million, was finalized after two years of litigation". Sheri stated their divorce was finalized in January 2019, but they had agreed on a settlement when they separated in 2016. According to Sheri, they agreed Cassie would buy out

RESTRICTED INFORMATION **SBA FORM 21 09/18**	This report is confidential and may contain information that is prohibited from disclosure by the Privacy Act, 5 USC 552a. Therefore, this report is furnished solely on an official need-to-know basis and must not be released or disseminated to any other party without prior written consent of the Assistant Inspector General for Investigations of the Small Business Administration/or designee. Unauthorized release may result in criminal prosecution and/or other penalties as may be available under law.

Sheri's portion of their shared residence, located at [redacted] Los Gatos, CA 95032. Sheri said Cassie paid her $570,000.00 sometime prior to September of 2016.

Sheri stated the memorandum also incorrectly reports the dates of Cassie and Sheri's marriage and divorce. According to Sheri, she and Cassie were married in 2012, separated in 2016, and their divorce was finalized on January 1, 2019.

The memorandum reports, Sheri "suffers from significant mental health issues". Sheri refuted this claim. Sheri said has worked as a Sonographer (Ultrasound Technician) at Good Samaritan Hospital in San Jose for the past twenty-seven (27) years. Sheri stated she has never had any mental health issues.

The memorandum also reports, Sheri "would not be able to care for her son on her own adequately". Sheri refuted this claim. Sheri said she and Cassie have shared 50/50 custody of their son since they separated when he was two-years old. Sheri stated there is no reason she would be unable to care for [redacted] on her own. Sheri said she also has a large support system to help with [redacted] care on days she has to work. This support system includes Sheri's parents, friends, and co-workers.

The memorandum also states, "Together, they adopted Ms. Will-Darnall's son, who is now eleven years old". Sheri reported their son, [redacted], was not adopted. Sheri said [redacted] was one of four donor embryos she and Cassie obtained from an IVF (In Vitro Fertilization) lab. The embryos were implanted into Sheri, and she later gave birth to [redacted]. Sheri is concerned someone might read the memorandum and tell [redacted] he is adopted, when both she and Cassie know he was not adopted.

Attached to the Memorandum is Exhibit A, which contains interviews conducted with several individuals. Sheri is concerned with untrue statements made by Esther Moomjian (Esther).

In Esther's interview report, Esther says she is "not aware of other significant romantic partners Cassie has had prior to her ex-wife Sherri". According to Sheri, Esther and Cassie were in a Domestic Partnership for approximately five (5) years before she and Cassie got married. Sheri said gay marriage was not legal in California at the time, so the only legally recognized relationship for same-sex couples was Domestic Partnership.

Sheri also mentioned Esther has been renting a room from Cassie's mother for approximately one year. Sheri was unsure if Eshter helped with any caregiving Cassie's mother needed.

In Esther's interview report, Esther also said she has witnessed unnecessary conflict between Sheri and Cassie, but "the conflict never escalated to getting physical". Sheri refuted this claim. In April 2024, Cassie was at Sheri's house and was talking badly to Sheri. Sheri said she started recording Cassie with her cellular telephone. Sheri stated Cassie told her to stop recording and when she refused, Cassie grabbed both of Sheri's wrists, forcibly removed the phone from Sheri's hands, and left the residence taking Sheri's phone with her. Cassie later called the police to report what had happened. Police Officer Dutra, Badge #5092, of the San Jose Police Department

RESTRICTED INFORMATION **SBA FORM 21 09/18**	This report is confidential and may contain information that is prohibited from disclosure by the Privacy Act, 5 USC 552a. Therefore, this report is furnished solely on an official need-to-know basis and must not be released or disseminated to any other party without prior written consent of the Assistant Inspector General for Investigations of the Small Business Administration/or designee. Unauthorized release may result in criminal prosecution and/or other penalties as may be available under law.

responded to Sheri's residence and took a report for Domestic Battery – Case #24-119-0413. Sheri said Cassie was never charged, but the officer told her Cassie could have been arrested for what she did. A copy of the Incident Report card provided to Sheri by Officer Dutra is attached to this report (Attachment 1).

Also attached to the Memorandum is Exhibit B – Statement of Cassie Will Darnall. In the statement, Cassie states, "My son, who has obsessive-compulsive disorder, depends on me for stability." Sheri refuted the statement. Sheri said [redacted] has only seen their counselor a couple of times in the past six months. According to Sheri, [redacted] has not been diagnosed with Obsessive Compulsive Disorder.

In Exhibit B, Cassie also states, "I devote at least 15 hours a week coordinating his schooling and therapy." Sheri also refuted this statement. [redacted] attends a private school and is in mainstream classes. According to Sheri, [redacted] does not have an Individualized Education Plan or require any specialized classes or assistance.

Attachment:

1. Incident Card – Provided to Sheri Darnall by SJPD Officer Dutra, dated April 28, 2024

RESTRICTED INFORMATION **SBA FORM 21 09/18**	This report is confidential and may contain information that is prohibited from disclosure by the Privacy Act, 5 USC 552a. Therefore, this report is furnished solely on an official need-to-know basis and must not be released or disseminated to any other party without prior written consent of the Assistant Inspector General for Investigations of the Small Business Administration/or designee. Unauthorized release may result in criminal prosecution and/or other penalties as may be available under law.