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**UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA  
SOUTHERN DIVISION**

SECURITIES AND EXCHANGE  
COMMISSION,

Plaintiff,

vs.

RICHARD VU NGUYEN, A/K/A  
NGUYEN THANH VU, and NTV  
FINANCIAL GROUP, INC.,

Defendants,

and

MAI DO,

Relief Defendant

**Civil Action No.: 8:19-cv-01174-AG-KES**

Honorable Andrew J. Guilford

**DECLARATION OF MAI DO IN  
SUPPORT OF OPPOSITION TO EX  
PARTE APPLICATION FOR OSC  
RE: CIVIL CONTEMPT**

**Complaint Filed: 6/13/18  
Trial Date: None Set**

**DECLARATION OF MAI DO**

I, Mai Do, hereby declare as follows:

1. I am a defendant in the above entitled action.

2. I make this declaration in support of Opposition to Ex Parte Application for Order to Show Cause Why Richard Nguyen and Mai Do Should Not be Held in Civil Contempt. I have personal knowledge of the facts stated herein and if called as a witness I would and could competently testify to the matters stated herein.

3. In July 2003, I purchased the property at 12632 Jerome Lane, Garden Grove, California, for use as my personal residence. Over the years since the purchase, a substantial amount of equity has built up in the Jerome Property.

4. In early June 2019, I applied for a refinance and cash out in the Jerome Property so that I could pay off credit card debts, property tax, and a home remodel. I also withdrew a portion of the funds in cash. At the time of the refinance, I was not aware of any lawsuit or court order.

5. On June 26, 2019, I was served with the summons and complaint in this lawsuit. The documents served on me were stuffed in a full banker's box with thousands of pages of documents. I did not understand the legal documents.

6. On July 15, 2019, I provided my attorney with my list of assets, including real property and personal property.

7. At the time I provided my attorney with my list of assets, I had fully disclosed all accounts that I believed were subject to the Preliminary Injunction Order. The Receiver has mischaracterized my cooperation and candor with the Court on disclosure of my assets.

8. The additional accounts identified by the Receiver are accounts that I did not believe were subject to the disclosure requirement as they were either: (1)

1 closed before this lawsuit; (2) had a nominal amount of funds; or (3) opened after I  
2 had already provided my List of Assets. Further, since the SEC had previously  
3 identified and frozen accounts at Bank of America, I did not list the accounts  
4 ending in 2347 and 5653 as I believed they were not subject to the alleged claims,  
5 otherwise the SEC would have already frozen these accounts.

6 9. The Cathay Bank account identified by the Receiver is another  
7 account I did not believe was subject to disclosure because: 1) the funds were from  
8 the refinance of my personal property that was purchased over 15 years before the  
9 alleged activities; 2) funds were used to pay credit card debt, property tax and my  
10 home remodel; and 3) the account was effectively closed having zero funds when I  
11 made my disclosure.

12 10. The Fidelity Brokerage account is another account I did not believe  
13 was subject to disclosure because the Preliminary Injunction Order did not prohibit  
14 me from stock trading for personal benefit. As I understood it, the Preliminary  
15 Injunction Order prohibited any trading by NTV Financial Group and any trading  
16 in the private brokerage accounts of third-party individuals.

17 11. Based upon the foregoing, I did not and do not believe that I have  
18 taken any action with the intent to violate the Court Order.  
19  
20

21 I declare under penalty of perjury of the laws of the United States of  
22 America that the foregoing is true and correct. Executed on August 30, 2019, at  
23 Santa Ana, California.  
24

25 By: /s/ Mai Do

26 Mai Do  
27  
28

**CERTIFICATE OF SERVICE**

I hereby certify that on August 30, 2019, I electronically filed the foregoing  
“Declaration of Mai Do in Support of Opposition to OSC re: Civil Contempt” with  
the Clerk of the Court using the CM/ECF system which will send notification of  
such filing via electronic mail to all counsel of record.

/s/ Mike N. Vo

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