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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 RICHARD VU  
NGUYEN IN SUPPORT OF  
OPPOSITION TO EX PARTE  
APPLICATION FOR OSC RE:  
CIVIL CONTEMPT**

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

**DECLARATION OF RICHARD NGUYEN**

I, Richard Vu Nguyen, hereby declare as follows:

1. I am a defendant in the above entitled action. I formerly ran and operated NTV Financial Group, Inc., until the appointment of Receiver Jeffrey Brandlin.

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. 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.

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

5. 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.

6. The Citibank account ending 7824 identified by the Receiver I opened after submitting my List of Assets. Because of the asset freeze over my business and personal accounts, I needed an account to handle the banking transaction of my construction business. This business is unrelated to the allegations in the lawsuit and I had a good faith belief I did not need to disclose.

7. The Fidelity account ending 8347 identified by the Receiver had no trading activity and no monies. In fact, it had an account value of \$1.24 on June

1 30, 2109. Due to the inactivity and effectively zero funds, I had a good faith belief  
2 this account did not need to be disclosed.

3 8. Based upon the foregoing, I did not and do not believe that I have  
4 taken any action with the intent to violate the Court Order.  
5

6 I declare under penalty of perjury of the laws of the United States of  
7 America that the foregoing is true and correct. Executed on August 30, 2019, at  
8 Santa Ana, California.  
9

10 By: /s/ Richard Nguyen

11 Richard Nguyen  
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**CERTIFICATE OF SERVICE**

I hereby certify that on August 30, 2019, I electronically filed the foregoing  
“Declaration of Richard Nguyen 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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