

SMILEY WANG-EKVALL, LLP  
3200 Park Center Drive, Suite 250  
Costa Mesa, California 92626  
Tel 714 445-1000 • Fax 714 445-1002

**SMILEY WANG-EKVALL, LLP**  
Kyra E. Andrassy, State Bar No. 207959  
*kandrassy@swelawfirm.com*  
Michael L. Simon, State Bar No. 300822  
*msimon@swelawfirm.com*  
3200 Park Center Drive, Suite 250  
Costa Mesa, California 92626  
Telephone: 714 445-1000  
Facsimile: 714 445-1002

Attorneys for Jeffrey E. Brandlin,  
Receiver

**UNITED STATES DISTRICT COURT**  
**CENTRAL DISTRICT OF CALIFORNIA, SOUTHERN DIVISION**

SECURITIES AND EXCHANGE  
COMMISSION,

Plaintiff,

v.

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

Defendants,

and

MAI DO,

Relief Defendant.

Case No. SACV19-1174-AG (KESX)

**STIPULATION TO ABANDON  
FISH TANKS AND FISH TO  
RICHARD NGUYEN**

The Hon. Andrew J. Guilford

[(Proposed) Order lodged  
concurrently herewith]

Jeffrey Brandlin, the permanent receiver (the "Receiver") appointed by the Court over the assets of NTV Financial Group, Inc. ("NTV Financial"), and accounts held by NTV Financial, and Richard Vu Nguyen, enter into this stipulation by and through their respective counsel of record pursuant to the following recitals:

**RECITALS**

1. By order entered on June 14, 2019 [Docket No. 15], as amended by a minute order entered on June 24, 2019 [Docket No. 21], the Court

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1 appointed the Receiver as the temporary receiver of NTV Financial and its  
 2 subsidiaries and affiliates and all bank accounts through which investor  
 3 funds flowed.

4 2. Pursuant to a stipulation of the parties, by order entered on July  
 5 3, 2019 [Docket No. 25], the Court issued a preliminary injunction and  
 6 appointed the Receiver as the permanent receiver, giving him control over  
 7 all assets of NTV, among other things.

8 3. AT NTV Financial's location at 900 W. 17<sup>th</sup> St., Unit B, Santa  
 9 Ana, CA, there are three freshwater fish tanks with fish in them. The  
 10 Receiver contacted two different aquarium companies and neither was  
 11 interested in purchasing the tanks and fish or in retrieving them without cost  
 12 to the receivership estate. The Receiver does not believe they have any  
 13 value and they are burdensome to the estate because they will require  
 14 continuing care and maintenance. Although the Receiver has continued to  
 15 make sure the fish have had food since his appointment, the Receiver has  
 16 not done any other maintenance on the tanks and makes no representations  
 17 about the condition of the fish or the tanks.

18 4. Richard Nguyen is willing to remove the fish tanks and the fish  
 19 from the Property at his own expense.

20  
 21 Pursuant to the foregoing recitals, the parties stipulate as follows:

## 22 **STIPULATION**

23 The Receiver is authorized to abandon the interest of the receivership  
 24 estate in the fish tanks and fish located at the Property to Richard Nguyen,  
 25 who will promptly retrieve them at his own expense with no additional cost to

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1 the receivership estate.

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4 DATED: July 16, 2019

SMILEY WANG-EKVALL, LLP

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6  
7 By: /s/ Kyra E. Andrassy  
8 KYRA E. ANDRASSY  
9 Attorneys for Jeffrey Brandlin,  
10 Receiver

11 DATED: July 16, 2019

LAW OFFICES OF MIKE N. VO, APLC

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14 By: /s/ Mike N. Vo  
15 MIKE N. VO  
16 JULIE H. LIN  
17 Attorneys for Richard Vu Nguyen and  
18 Mai Do  
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**PROOF OF SERVICE**

**STATE OF CALIFORNIA, COUNTY OF ORANGE**

At the time of service, I was over 18 years of age and not a party to this action. I am employed in the County of Orange, State of California. My business address is 3200 Park Center Drive, Suite 250, Costa Mesa, CA 92626.

On **07/16/19**, I served true copies of the following document(s) described as **STIPULATION TO ABANDON FISH TANKS AND FISH TO RICHARD NGUYEN** on the interested parties in this action as follows:

**SEE ATTACHED SERVICE LIST**

**(X) (BY COURT VIA NOTICE OF ELECTRONIC FILING ("NEF"))** – Pursuant to United States District Court, Central District of California, Local Civil Rule 5-3, the foregoing document will be served by the court via NEF and hyperlinked to the document. On **07/16/19**, I checked the CM/ECF docket for this case and determined that the aforementioned person(s) are on the Electronic Mail Notice List to receive NEF transmission at the email address(es) indicated.

**( ) (BY E-MAIL).** By scanning the document(s) and then e-mailing the resultant pdf to the e-mail address indicated above per agreement. Attached to this declaration is a copy of the e-mail transmission.

**( ) (BY FACSIMILE).** I caused the above-referenced documents to be transmitted to the noted addressee(s) at the fax number as stated. Attached to this declaration is a "TX Confirmation Report" confirming the status of transmission. Executed on \_\_\_\_\_, at Costa Mesa, California.

**( ) STATE** I declare under the penalty of perjury under the laws of the State of California that the above is true and correct.

**(X) FEDERAL** I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

Executed on July 16, 2019, at Costa Mesa, California.

/s/ Lynnette Garrett  
Lynnette Garrett

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**SERVICE LIST**

**(BY COURT VIA NOTICE OF ELECTRONIC FILING ("NEF")):**

- Kyra E Andrassy  
kandrassy@swelawfirm.com,jchung@swelawfirm.com,lgarrett@swelawfirm.com,g  
cruz@swelawfirm.com
- Julie Haram Lin  
jlin@mikevolaw.com
- Douglas M Miller  
millerdou@sec.gov,caseview.ECF@usdoj.gov,usacac.criminal@usdoj.gov,longoa  
@sec.gov,irwinma@sec.gov
- Mike N Vo  
mvo@mikevolaw.com

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8 **UNITED STATES DISTRICT COURT**  
9 **CENTRAL DISTRICT OF CALIFORNIA, SOUTHERN DIVISION**  
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11 SECURITIES AND EXCHANGE  
12 COMMISSION,

13 Plaintiff,

14 v.

15 RICHARD VU NGUYEN, A/K/A  
16 NGUYEN THANH VU, AND NTV  
FINANCIAL GROUP, INC.,

17 Defendants,

18 and

19 MAI DO,

20 Relief Defendant.

Case No. SACV19-1174-AG (KESX)

**[PROPOSED] ORDER  
APPROVING STIPULATION TO  
ABANDON FISH TANKS AND  
FISH TO RICHARD NGUYEN**

The Hon. Andrew J. Guilford

21 The Court having reviewed the *Stipulation to Abandon Fish Tanks and*  
22 *Fish to Richard Nguyen* (the "Stipulation") and cause appearing,

23 **IT IS ORDERED** that the Stipulation is approved and Jeffrey Brandlin,  
24 the permanent receiver appointed by the Court over the assets of NTV  
25 Financial Group, Inc. and certain accounts is authorized to abandon the fish  
26 tanks and fish located at 900 W. 17<sup>th</sup> St., Unit B, Santa Ana, CA to Richard

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1 Vu Nguyen on the terms set forth in the Stipulation.

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3 DATED: \_\_\_\_\_, 2019

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\_\_\_\_\_  
The Honorable Andrew J. Guilford,  
United States District Court Judge

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