

DOUGLAS M. MILLER (Cal. Bar No. 240398)

Email: millerdou@sec.gov

KELLY C. BOWERS (Cal. Bar No. 164007)

Email: bowersk@sec.gov

Attorneys for Plaintiff

Securities and Exchange Commission

Michele Wein Layne, Regional Director

Alka Patel, Associate Regional Director

Amy J. Longo, Regional Trial Counsel

444 S. Flower Street, Suite 900

Los Angeles, California 90071

Telephone: (323) 965-3998

Facsimile: (213) 443-1904

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
Western Division

COMMISSION,

Plaintiff,

vs.

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

Defendants,

and

MAI DO,

Relief Defendant.

Case No. 8:19-cv-01174-AG-KES

**DECLARATION OF DOUGLAS M.
MILLER IN SUPPORT OF EX
PARTE APPLICATION TO AMEND
PRELIMINARY INJUNCTION AND
CONTINUATION OF ORDERS: (1)
FREEZING ASSETS; (2) REQUIRING
ACCOUNTINGS; (3) PROHIBITING
THE DESTRUCTION OF
DOCUMENTS; AND (4)
APPOINTING RECEIVER**

1 I, Douglas M. Miller, declare pursuant to 28 U.S.C. § 1746 as follows:

2 1. I am an attorney admitted to practice law by the State Bar of California
3 and by this Court. I am currently a Senior Trial Counsel with Plaintiff Securities and
4 Exchange Commission's ("SEC") Los Angeles Regional Office. I have personal
5 knowledge of the matters set forth herein, except as otherwise noted, and, if called as
6 a witness, I could and would competently testify under oath to the facts stated herein.

7 2. I make this declaration in support of the SEC's accompanying Ex Parte
8 Application to Amend Preliminary Injunction and Continuation of Orders: (1)
9 Freezing Assets; (2) Requiring Accountings; (3) Prohibiting The Destruction Of
10 Documents; and (4) Appointing Receiver.

11 3. On August 8, 2019, I contacted counsel for the court-appointed receiver,
12 Kyra Andrassy, and let her know that I planned to file the Ex Parte Application to
13 Amend Preliminary Injunction and Continuation of Orders: (1) Freezing Assets; (2)
14 Requiring Accountings; (3) Prohibiting The Destruction Of Documents; and (4)
15 Appointing Receiver. Ms. Andrassy stated that she did not oppose the application.

16 4. On August 7, 2019, I contacted counsel for defendant Richard Vu
17 Nguyen and relief defendant Mai Do, Mike N. Vo, and let him know that I planned to
18 file the Ex Parte Application to Amend Preliminary Injunction and Continuation of
19 Orders: (1) Freezing Assets; (2) Requiring Accountings; (3) Prohibiting The
20 Destruction Of Documents; and (4) Appointing Receiver. Mr. Vo stated that
21 defendant Nguyen and relief defendant Do opposed the application and he intends to
22 oppose it.

23 5. On or about August 1, 2019, I learned from Ms. Andrassy that the
24 property located at 2506 Monte Carlo Dr., Santa Ana, CA 92706 was listed as for sale
25 on a prominent real estate website. Attached hereto as **Exhibit 1** is a printout from
26 the real estate website showing the listing of the Monte Carlo property.

27 6. On or about August 2, 2019, I sent letters to Mr. Vo and the real estate
28 listing agent, as well as the listing agent's registered broker, advising them of the

1 asset freeze and alerting them that the SEC viewed the sale of the property as a
2 violation of the Court's order. Attached hereto as **Exhibits 2 and 3** are true and
3 correct copies of the letters I sent to the listing agents and Mr. Vo, respectively.

4 I declare under penalty of perjury under the laws of the United States of
5 America that the foregoing is true and correct.

6
7 Executed this 8th day of August, 2019 in Los Angeles, California.

8
9 /s/ Douglas M. Miller
10 DOUGLAS M. MILLER
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PROOF OF SERVICE

I am over the age of 18 years and not a party to this action. My business address is:

U.S. SECURITIES AND EXCHANGE COMMISSION,
444 S. Flower Street, Suite 900, Los Angeles, California 90071
Telephone No. (323) 965-3998; Facsimile No. (213) 443-1904.

On August 8, 2019, I caused to be served the document entitled **DECLARATION OF DOUGLAS MILLER IN SUPPORT OF EX PARTE APPLICATION TO AMEND PRELIMINARY INJUNCTION AND CONTINUATION OF ORDERS: (1) FREEZING ASSETS; (2) REQUIRING ACCOUNTINGS; (3) PROHIBITING THE DESTRUCTION OF DOCUMENTS; AND (4) APPOINTING RECEIVER** on all the parties to this action addressed as stated on the attached service list:

☐ **OFFICE MAIL:** By placing in sealed envelope(s), which I placed for collection and mailing today following ordinary business practices. I am readily familiar with this agency's practice for collection and processing of correspondence for mailing; such correspondence would be deposited with the U.S. Postal Service on the same day in the ordinary course of business.

☐ **PERSONAL DEPOSIT IN MAIL:** By placing in sealed envelope(s), which I personally deposited with the U.S. Postal Service. Each such envelope was deposited with the U.S. Postal Service at Los Angeles, California, with first class postage thereon fully prepaid.

☐ **EXPRESS U.S. MAIL:** Each such envelope was deposited in a facility regularly maintained at the U.S. Postal Service for receipt of Express Mail at Los Angeles, California, with Express Mail postage paid.

☐ **HAND DELIVERY:** I caused to be hand delivered each such envelope to the office of the addressee as stated on the attached service list.

☐ **UNITED PARCEL SERVICE:** By placing in sealed envelope(s) designated by United Parcel Service ("UPS") with delivery fees paid or provided for, which I deposited in a facility regularly maintained by UPS or delivered to a UPS courier, at Los Angeles, California.

☐ **ELECTRONIC MAIL:** By transmitting the document by electronic mail to the electronic mail address as stated on the attached service list.

☒ **E-FILING:** By causing the document to be electronically filed via the Court's CM/ECF system, which effects electronic service on counsel who are registered with the CM/ECF system.

☐ **FAX:** By transmitting the document by facsimile transmission. The transmission was reported as complete and without error.

I declare under penalty of perjury that the foregoing is true and correct.

Date: August 8, 2019

/s/ Douglas Miller

Douglas M. Miller

SEC v. Miller et al.
United States District Court—Central District of California
Case No. 8:19-cv-01174-AG-KES

SERVICE LIST

*Counsel for Defendant(s) Richard Vu Nguyen and Relief Defendant
Mai Do:*

Mike N. Vo
17910 Skypark Circle, Suite 103
Irvine, CA 92614

Counsel for NTV Financial, Inc.:

Kyra Andrassy for Court Appointed Receiver
kandrassy@swelawfirm.com

Court-Appointed Receiver:

Jeffrey E. Brandlin, CPA
Brandlin & Associates
jeff@brandlin.com

REDFIN

City, Address, School, Agent, Z

1-844-759-7732

Buy ▾

Sell ▾

Real Estate Agents

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2506 Monte Carlo Dr #3

Santa Ana, CA 92706

\$419,000

Price

Redfin Estimate: \$419,408 On Redfin: 8 days

Status: Active

3

Beds

2.5

Baths

1,090 Sq. Ft.

\$384 / Sq. Ft.



Street View

Go Tour This Home



Schedule Tour

It's free, with no obligation — cancel anytime

Elizabeth Do
Keller Williams Realty
Redfin Partner Agent

★★★★★
290 client reviews



Ask a Question

< 1 of 3 Partner Agents in this area >

Beautiful & completely remodeled Town home in a prime location of Westminster St and Fairview Ave, the home features of 3 bedrooms, 2.5 bathrooms, garage has direct access, the living area is 1,088 SQFT and a private patio that's just the right size for family & friend

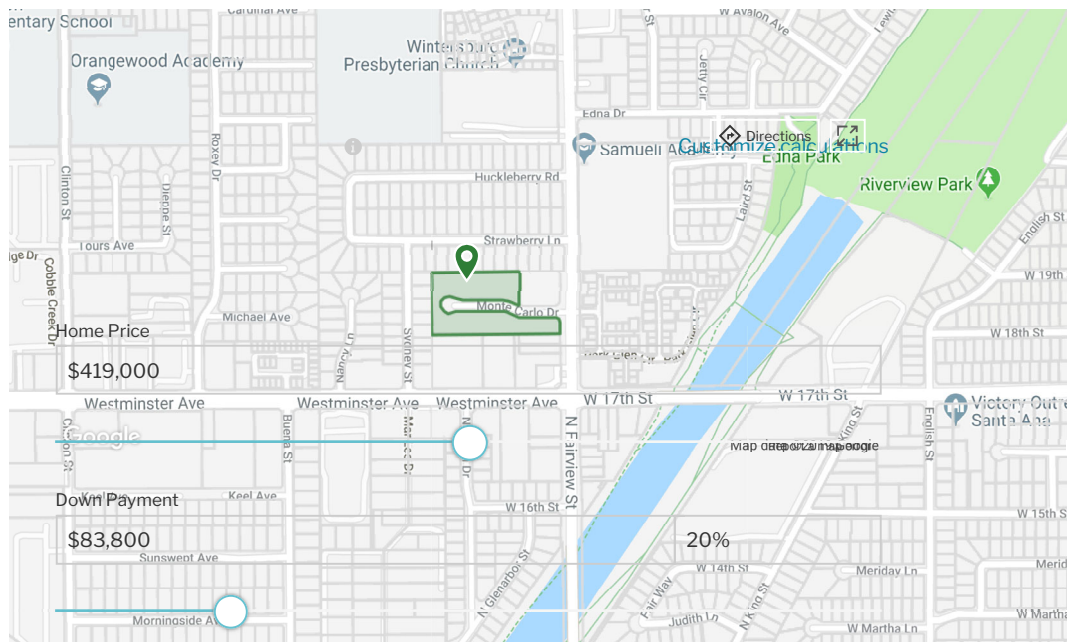
[Continue reading ▾](#)

Baths	2 full, 1 partial	HOA Dues	\$275/month
Property Type	Condominium	View	None
Community	70 - Santa Ana North of First	County	<u>Orange</u>
MLS#	PW19181572	Built	1978
Lot Size	1,200 square feet		



-- min · [Add a Commute](#)

Listed by Theresa Nguyen • BRE #01449487 • OC Realty & Investments
 Redfin last checked: [6 minutes ago](#) | Last updated Aug 6, 2019 • Source: CRMLS



Nearby Similar Homes

OPEN SAT, 1PM TO 4PM



\$465,000

2 Beds 2 Baths 1,268 Sq. Ft.

141 E Ponderosa Ln #5, Anaheim, CA 92802

\$460,000

2 Beds 2.5 Baths 1,262 Sq. Ft.

2330 S Cutty Way #89, Anaheim, CA 92802

Property Details for 2506 Monte Carlo Dr Apt 3

Interior Features	
Laundry Information <ul style="list-style-type: none"> Has Laundry In Garage 	Room Information <ul style="list-style-type: none"> All Bedrooms Down, Kitchen, Living Room, Master Bathroom, Master Bedroom
Kitchen Information <ul style="list-style-type: none"> Appliances: Dishwasher, Garbage Disposal, Gas & Electric Range, Range/Stove Hood, Water Heater Unit Has Appliances Separated Granite Counters, Remodeled Kitchen 	Fireplace Information <ul style="list-style-type: none"> Living Room Has Fireplace
Bathroom Information <ul style="list-style-type: none"> # of Baths (Full): 2 # of Baths (1/2): 1 Shower, Shower in Tub, Granite Counters, Remodeled 	Flooring Information <ul style="list-style-type: none"> Laminated, Tile
Cooling Information <ul style="list-style-type: none"> Central Has Cooling 	Heating Information <ul style="list-style-type: none"> Central Furnace Has Heating
Interior Features <ul style="list-style-type: none"> Ceiling Fan, Granite Counters Levels: Two Main Level Bathrooms: 3 Main Level Bedrooms: 3 Security Features: Carbon Monoxide Detector(s), Smoke Detector 	
Parking / Garage, Multi-Unit Information, Homeowners Association, Utilities	
Parking / Garage Information <ul style="list-style-type: none"> Attached Garage # of Garage Spaces: 1 Direct Garage Access, Garage, Garage - Single Door Has Parking # of Parking Spaces: 1 	Homeowners Association <ul style="list-style-type: none"> Is Part of Association Association Name: Los Quatros Homeowner Association Monthly Association Fee: \$275 Association Amenities: Trash, Water
Multi-Unit Information <ul style="list-style-type: none"> # of Units In Community: 25 	Utilities Information <ul style="list-style-type: none"> Sewer: Other Electricity Connected, Natural Gas Available, Water Connected Water Source: District/Public
Exterior Features	
Exterior Information <ul style="list-style-type: none"> Fencing: Blockwall Has Fence 	Exterior Features <ul style="list-style-type: none"> Pool Features: None
School / Neighborhood	
Neighborhood Information <ul style="list-style-type: none"> Sidewalks, Street Lighting 	School Information <ul style="list-style-type: none"> High School District: Santa Ana Unified
Property / Lot Details	
Lot Information <ul style="list-style-type: none"> Elevation Units: Feet Lot Size Source: Assessor's Data Lot Features: Patio Home 	<ul style="list-style-type: none"> Parcel Number: 93572003 Attached Property Total # of Stories: 2 Year Built Source: Assessor
Property Information <ul style="list-style-type: none"> Total # of Units: 1 Common Walls: 1 common wall, No one above, No one below 	
Location Details	
Location Information <ul style="list-style-type: none"> Other Subdivision Name: Other Directions: Westminster & Fairview 	<ul style="list-style-type: none"> Subdivision Name: Other (OTHR)

Details provided by CRMLS and may not match the public record. [Learn more.](#)

Ask Redfin Partner Agent Elizabeth a Question

**Elizabeth Do**

Santa Ana Redfin Partner Agent
Keller Williams Realty
Responds in 4 business hours

I'd like to know more about 2506 Monte Carlo Dr #3.

Ask a Question

Property History for 2506 Monte Carlo Dr Apt 3

Date	Event & Source	Price
Jul 31, 2019	Listed (Active)	\$419,000
May 6, 2019	Sold (MLS) (Closed Sale)	\$373,000
May 1, 2019	Pending (Pending Sale)	—

[See all property history](#) ▾

Schools

Serving This Home Elementary Middle High

School Name	GreatSchools Rating	Distance
Clinton-Mendenhall Elementary School Public • K to 6 • Serves this home 4 Parent Rating: ★★★★★ See homes this school serves		0.5 mi
Leroy L. Doig Intermediate School Public • 7 to 8 • Serves this home 6 Parent Rating: ★★★★★ See homes this school serves		0.3 mi
Santiago High School Public • 9 to 12 • Serves this home 6 Parent Rating: ★★★★★ See homes this school serves		0.6 mi

School data provided by GreatSchools. School service boundaries are intended to be used as reference only. To verify enrollment eligibility for a property, contact the school directly.

Redfin Tour Insights for 2506 Monte Carlo Dr #3

We haven't left any insights about this home yet, but as soon as we do, we'll leave our thoughts here.

Activity for 2506 Monte Carlo Dr #3

 649 Views	 33 Favorites	 6 X-Outs	 0 Redfin Tours
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Public Facts for 2506 Monte Carlo Dr Apt 3

Taxable Value

Land	\$109,445
Additions	\$101,060
Total	\$210,505

Tax Record

2018	\$2,622
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Home Facts

Beds	3	Lot Size	—
Baths	2.5	Style	Condo/Co-op
Finished Sq. Ft.	1,090	Year Built	1978
Unfinished Sq. Ft.	—	Year Renovated	1978
Total Sq. Ft.	1,090	County	Orange County
Stories	2	APN	93572003

Home facts updated by county records on Jul 14, 2019.

Redfin Estimate for 2506 Monte Carlo Dr #3

\$419,408

+\$408 over list price of \$419K

Redfin Estimate based on recent home sales. [View estimate history.](#)

SOLD JUN 10, 2019

A

SOLD MAY 29, 2019

B

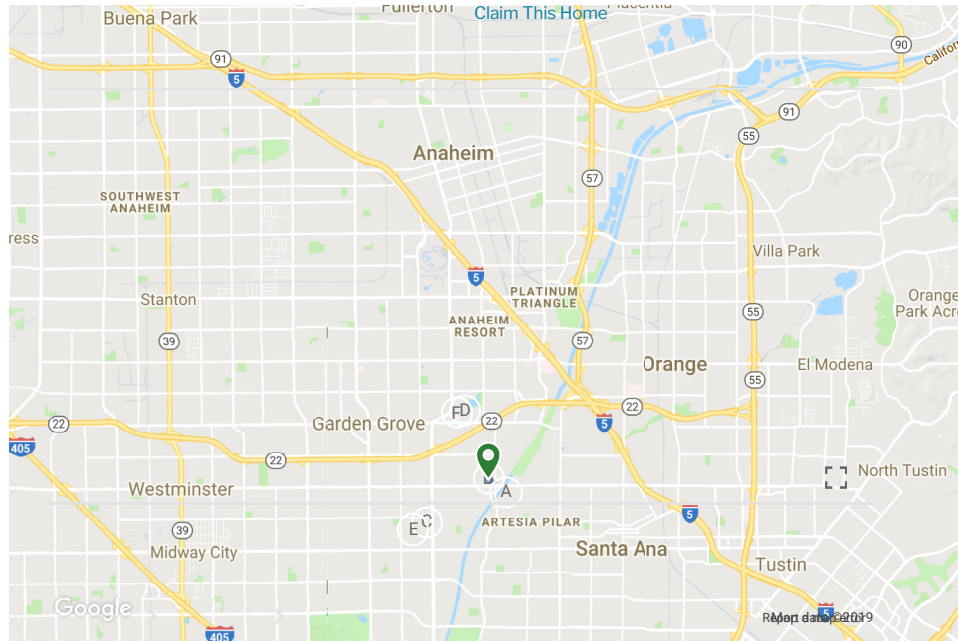


\$290,000
1602 N King St Unit M2
Santa Ana, CA 92706

2 1.5 930
Beds Baths Sq. Ft.

\$365,000
2629 Monte Carlo Dr #47
Santa Ana, CA 92706

2 2 904
Beds Baths Sq. Ft.



Transportation in 92706



70 /100

Very Walkable



43 /100

Some Transit



82 /100

Very Bikeable

This area is **very walkable** — most errands can be accomplished on foot. **Transit is available**, with a few nearby public transportation options. It's **convenient** to use a bike for most trips.

92706 Real Estate Sales (Last 30 days)

	Median List Price	\$700,000	Avg. # Offers	1.0
	Median \$ / Sq. Ft.	\$403	Avg. Down Payment	50.0%
	Median Sale / List	98%	# Sold Homes	11

What It Takes to Win an Offer near 92706

~\$700K Offer

22 Weeks Ago

3 Beds, 2 Baths, ~1,250 Sq. Ft. House

Winning Offer

2%

Over List Price

5

Days on Market

—

Competing Offers

—

Down Payment

[Jane Yoo-Pappas](#)



Redfin Agent

~\$650K Offer

25 Weeks Ago

3 Beds, 2 Baths, ~1,250 Sq. Ft. House

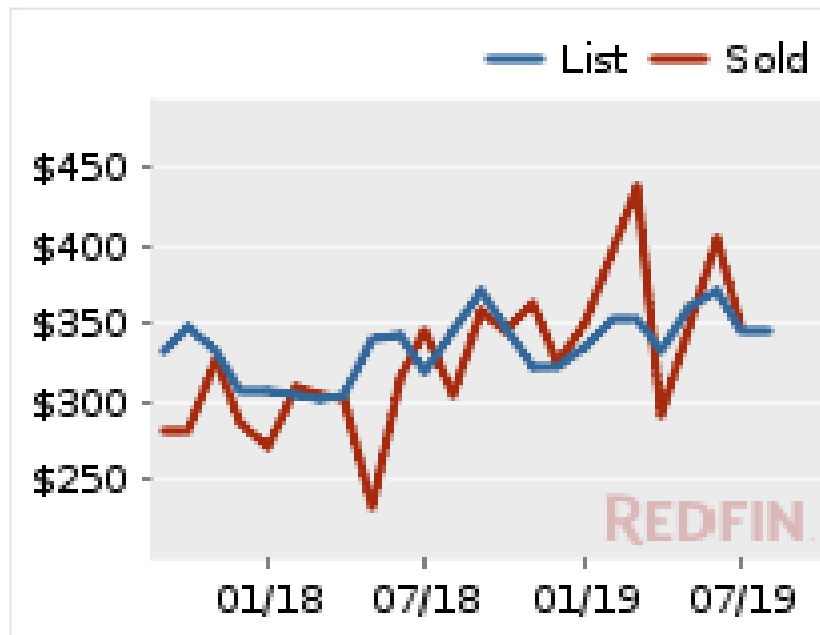
Offer Not Accepted — Sold for \$700K

0%
Over List Price7
Days on Market3
Competing Offers~30%
Down PaymentJane Yoo-Pappas
Redfin Agent

Median Real Estate Values

Location	List Price	\$ / Sq. Ft.	Sale / List
Trask Fairview	\$599,450	\$422	—
92706	\$700,000	\$412	97.4%
Santa Ana	\$619,000	\$386	98.4%
Orange County	\$819,000	\$434	98.6%

\$/Sq. Ft. Condos in 92706



Nearby Similar Homes

Homes similar to 2506 Monte Carlo Dr #3 are listed between \$270K to \$685K at an average of \$370 per square foot.

OPEN SAT, 1PM TO 4PM

ACCEPTING BACKUP OFFERS

\$465,000

2 Beds 2 Baths 1,268 Sq. Ft.
141 E Ponderosa Ln #5, Anaheim, CA 92802

\$460,000

2 Beds 2.5 Baths 1,262 Sq. Ft.
2330 S Cutty Way #89, Anaheim, CA 92802

\$435,000

3 Beds 1.5 Baths 1,238 Sq. Ft.
2107 S June Pl, Anaheim, CA 92802
Keller Williams Realty

NEW CONSTRUCTION HOT HOME

OPEN SAT, 1PM TO 4PM

\$485,000

3 Beds 2.5 Baths 1,404 Sq. Ft.
12943 Newhope St, Garden Grove, CA 92840

\$447,200

3 Beds 3 Baths 1,495 Sq. Ft.
1446 Harbor Blvd N #4, Santa Ana, CA 92703

\$299,999

2 Beds 2 Baths 921 Sq. Ft.
4109 W 5th St Unit N1, Santa Ana, CA 92703

Nearby Recently Sold Homes

Nearby homes similar to 2506 Monte Carlo Dr #3 have recently sold between \$404K to \$510K at an average of \$355 per square foot.

SOLD MAR 26, 2019

SOLD MAR 6, 2019

SOLD MAR 4, 2019

\$440,000 Last Sold Price

4 Beds 2.5 Baths 1,525 Sq. Ft.
2148 W Churchill Cir, Anaheim, CA 92804

\$417,000 Last Sold Price

3 Beds 1.5 Baths 1,160 Sq. Ft.
8462 Central Ave, Garden Grove, CA 92844

\$475,000 Last Sold Price

3 Beds 2.5 Baths 1,232 Sq. Ft.
10082 Lola Ln #12, Garden Grove, CA 92843

SOLD MAR 12, 2019

SOLD MAY 20, 2019

SOLD MAY 16, 2019

More Real Estate Resources

New Listings in 92706

[2029 Cotter St](#)
[2301 N Park Blvd](#)
[1602 N King St Unit U4](#)
[1519 Riviera Dr](#)
[1026 W River Ln](#)
[2321 N Forest Ave](#)
[Show More](#)

Zip Codes

[92703](#)
[92704](#)
[92706](#)
[92707](#)
[92712](#)
[92725](#)
[Show More](#)

Nearby Cities

[Long Beach](#)
[Glendale](#)
[Riverside](#)
[Tustin](#)
[Pasadena](#)
[Los Angeles](#)
[Show More](#)

Neighborhoods

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[Mid-City](#)
[Bella Vista](#)
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2506 Monte Carlo Dr #3 is a condo in Santa Ana, CA 92706. This 1,090 square foot condo sits on a 1,200 square foot lot and features 3 bedrooms and 2.5 bathrooms. This condo has been listed on Redfin since July 31, 2019 and is currently priced at \$419,000. This property was built in 1978 and last sold on May 06, 2019 for \$373,000. Based on Redfin's Santa Ana data, we estimate the home's value is \$419,408, which is 0.1% more than its current list price. Comparable nearby homes include [1602 N King St Unit M2](#), [2629 Monte Carlo Dr #47](#), and [3850 W Hazard Ave Unit D](#). According to Redfin's Rental Estimate, we expect that this home would rent for between \$2,051 and \$2,572. Nearby schools include The Academy, Leroy L. Doig Intermediate School and Orangewood Academy. The closest grocery stores are Stater Bros. Markets, A & S Market and 17 One King Food Store. Nearby coffee shops include Tribute Coffee House, Mong Thuong Cafe and Egyptian Cafe. Nearby restaurants include Hien Vuong, Uno Free Pizza and Mariscos Los Corales. 2506 Monte Carlo Dr #3 is near Edna Park, 17th Street Triangle Trailside Overlook and Fairview Triangle. This address can also be written as 2506 Monte Carlo Drive Apartment 3, Santa Ana, California 92706.

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GreatSchools Ratings provided by GreatSchools.org.

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UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
LOS ANGELES REGIONAL OFFICE
444 S. FLOWER STREET, SUITE 900
LOS ANGELES, CALIFORNIA 90071

DIRECT DIAL: (323) 965-3837
FAX: (213) 443-1904

August 2, 2019

VIA EMAIL & REGULAR MAIL

Theresa Nguyen (Lic. #01449487)
OC Realty & Investments
10161 Bolsa Avenue, Ste 206B
Westminster, CA 92683
ocrealtyandfinance@gmail.com

Re: Securities and Exchange Commission v. Defendants Richard Vu Nguyen, aka
Nguyen Thanh Vu, and NTV Financial Group, Inc., and Relief Defendant Mai
Do, Case No. 19-cv-01174-AG-KES

Dear Ms. Nguyen:

This letter is directed to you as the listing agent for the property located at 2506 Monte Carlo Dr #3, Santa Ana, CA 92706.

Enclosed you will find a copy of the Preliminary Injunction and Orders (1) Freezing Assets; (2) Requiring Accountings; (3) Prohibiting the Destruction of Documents; (4) and Appointing a Permanent Receiver that was issued on July 2, 2019 by the United States District Court for the Central District of California ("the Court") in the above-referenced case (the "Order"). Enclosed you will also find a copy of the Notice of Submission of Defendants Richard V. Nguyen and Mai Do's List of Assets Pursuant To Preliminary Injunction Order.

As you will see, the Order freezes "all monies and assets" of Richard Vu Nguyen and Mai Do, which they have both acknowledged include the property located at 2506 Monte Carlo Dr #3, Santa Ana, CA 92706. Therefore, because we understand Richard Nguyen and/or Mai Do to be the current owner of the property located at 2506 Monte Carlo Dr #3, Santa Ana, CA

Theresa Nguyen (Lic. #01449487)
August 2, 2019
Page 2

92706, we would view any efforts to sell that property as a violation of the Order and the asset freeze imposed issued by the Court. If you have any questions, please feel free to contact me at 323-965-3837.

Sincerely,



DOUGLAS M. MILLER
Senior Trial Counsel

Enclosure(s)

cc: Kyra Andrassy, Esq.
Jeffrey Brandlin, CPA

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5 **UNITED STATES DISTRICT COURT**
6 **CENTRAL DISTRICT OF CALIFORNIA**
7

8
9 **SECURITIES AND EXCHANGE**
10 **COMMISSION,**

11 **Plaintiff,**

12 **vs.**

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

15 **Defendants,**

16 **and**

17 **MAI DO,**

18 **Relief Defendant.**
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Case No. 8:19-cv-01174-AG-KES

PRELIMINARY INJUNCTION AND
ORDERS (1) FREEZING ASSETS; (2)
REQUIRING ACCOUNTINGS; (3)
PROHIBITING THE DESTRUCTION
OF DOCUMENTS; (4) AND
APPOINTING A PERMANENT
RECEIVER

1 This matter comes before the Court upon the Stipulation of Defendants Richard
2 and Relief Defendant Mai Do, by and through their counsel Kien Le, and the court-
3 appointed temporary receiver over Defendant NTV Financial Inc., Jeffrey E. Brandlin
4 (“Receiver”), by and through his counsel, Kyra Andrassy, (collectively,
5 “Defendants”), and the Stipulation of Plaintiff Securities and Exchange Commission
6 (“SEC”) and Defendants to Entry of a Preliminary Injunction and a Continuation of
7 Orders (1) Freezing Assets; (2) Requiring Accountings; (3) Prohibiting the
8 Destruction of Documents; and (4) Appointing a Receiver.

9 The Court, having previously issued a Temporary Restraining Order and
10 Orders (1) Freezing Assets, (2) Requiring Accountings, (3) Prohibiting the
11 Destruction of Documents, and (4) Granting Expedited Discovery; and having
12 previously appointed Jeffrey E. Brandlin as a temporary receiver over Defendant
13 NTV Financial Inc., and having considered the SEC’s Complaint, TRO Application,
14 the supporting Memorandum of Points and Authorities, the supporting declarations
15 and exhibits, and any the other evidence and arguments presented to the Court, as
16 well as the Consent and Stipulation filed by the parties, finds:

17 A. This Court has jurisdiction over the parties to, and the subject matter of,
18 this action.

19 B. Defendants have consented and the Parties have stipulated to the entry of
20 a preliminary injunction on the terms below.

21 **I.**

22 IT IS HEREBY ORDERED that the Parties’ Stipulation to the Entry of a
23 Preliminary Injunction and Orders Freezing Assets, Requiring Accountings,
24 Prohibiting the Destruction of Documents, and Appointing a Permanent Receiver are
25 GRANTED.

26 **II.**

27 IT IS HEREBY ORDERED, ADJUDGED, AND DECREED that Defendants
28 NTV Financial and Nguyen are preliminarily restrained and enjoined from violating,

1 directly or indirectly, Section 10(b) of the Exchange Act [15 U.S.C. § 78j(b)] and
2 Rule 10b-5 promulgated thereunder [17 C.F.R. § 240.10b-5], by using any means or
3 instrumentality of interstate commerce, or of the mails, or of any facility of any
4 national securities exchange, in connection with the purchase or sale of any security:

- 5 (a) to employ any device, scheme, or artifice to defraud;
- 6 (b) to make any untrue statement of a material fact or to omit to state a
7 material fact necessary in order to make the statements made, in the light
8 of the circumstances under which they were made, not misleading; or
- 9 (c) to engage in any act, practice, or course of business which operates or
10 would operate as a fraud or deceit upon any person.

11 IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that, as
12 provided in Federal Rule of Civil Procedure 65(d)(2), the foregoing paragraph also
13 binds the following who receive actual notice of this Order by personal service or
14 otherwise: (a) Defendants NTV Financial's and Nguyen's officers, agents, servants,
15 employees, and attorneys; and (b) other persons in active concert or participation with
16 any of the Defendants NTV Financial and Nguyen or with anyone described in (a).

17 III.

18 IT IS FURTHER ORDERED that Defendants NTV Financial and Nguyen, and
19 their officers, agents, servants, employees, attorneys, subsidiaries and affiliates, and
20 those persons in active concert or participation with any of them, who receive actual
21 notice of this Order, by personal service or otherwise, and each of them, be and hereby
22 are preliminarily restrained and enjoined from, directly or indirectly, in the offer or
23 sale of any securities, by the use of any means or instruments of transportation or
24 communication in interstate commerce or by the use of the mails:

- 25 A. employing any device, scheme or artifice to defraud;
- 26 B. obtaining money or property by means of any untrue statement of a
27 material fact or any omission to state a material fact necessary in order to
28

1 make the statements made, in light of the circumstances under which
2 they were made, not misleading; or

3 C. engaging in any transaction, practice, or course of business which
4 operates or would operate as a fraud or deceit upon the purchaser;
5 in violation of Section 17(a) of the Securities Act, 15 U.S.C. § 77q(a).

6 IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that, as
7 provided in Federal Rule of Civil Procedure 65(d)(2), the foregoing paragraph also
8 binds the following who receive actual notice of this Order by personal service or
9 otherwise: (a) Defendants NTV Financial's and Nguyen's officers, agents, servants,
10 employees, and attorneys; and (b) other persons in active concert or participation with
11 any of the Defendants NTV Financial and Nguyen or with anyone described in (a).

12 **IV.**

13 IT IS HEREBY ORDERED, ADJUDGED, AND DECREED that Defendants
14 NTV Financial and Nguyen are preliminarily restrained and enjoined from

15 A. employing any device, scheme or artifice to defraud any client or
16 prospective client; and

17 B. engaging in any transaction, practice, or course of business which
18 operates or would operate as a fraud or deceit upon any client or
19 prospective client;

20 in violation of Sections 206(1) and (2) of the Advisers Act, 15 U.S.C. §§ 80b-6(1) &
21 80b-6(2).

22 IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that, as
23 provided in Federal Rule of Civil Procedure 65(d)(2), the foregoing paragraph also
24 binds the following who receive actual notice of this Order by personal service or
25 otherwise: (a) Defendants NTV Financial's and Nguyen's officers, agents, servants,
26 employees, and attorneys; and (b) other persons in active concert or participation with
27 any of the Defendants NTV Financial and Nguyen or with anyone described in (a).

28

1 V.

2 IT IS FURTHER ORDERED that Defendants NTV Financial and Nguyen, and
3 their agents, servants, employees, attorneys, and affiliates, and those persons in active
4 concert or participation with any of them, who receive actual notice of this Order, by
5 personal service or otherwise, and each of them, be and hereby are preliminarily
6 restrained and enjoined from, directly or indirectly, by the use of the mails or any
7 means or instrumentality of interstate commerce, while acting as an investment
8 adviser to a pooled investment vehicle:

9 A. making any untrue statement of a material fact or omitting to state a
10 material fact necessary to make the statements made, in the light of the
11 circumstances under which they were made, not misleading, to any
12 investor or prospective investor in a pooled investment vehicle;

13 B. engaging in any act, practice, or course of business that is fraudulent,
14 deceptive, or manipulative with respect to any investor or prospective
15 investor in a pooled investment vehicle;

16 in violation of Section 206(4) of the Advisers Act, 15 U.S.C. § 80b-6(4), and Rule
17 206(4)-8 thereunder, 17 C.F.R. § 275.206(4)-8.

18 IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that, as
19 provided in Federal Rule of Civil Procedure 65(d)(2), the foregoing paragraph also
20 binds the following who receive actual notice of this Order by personal service or
21 otherwise: (a) Defendants NTV Financial's and Nguyen's officers, agents, servants,
22 employees, and attorneys; and (b) other persons in active concert or participation with
23 any of the Defendants NTV Financial and Nguyen or with anyone described in (a).

24 VI.

25 IT IS HEREBY FURTHER ORDERED that Defendants NTV Financial and
26 Nguyen, and each of their agents, servants, employees and attorneys and those
27 persons in active concert or participation with them who receive actual notice of this
28 Order by personal service or otherwise, including facsimile transmission, electronic

mail, or overnight delivery service, are hereby prohibited from directly or indirectly, including through any entity they own or control, accessing any securities brokerage account of any third-party, including doing so with the consent of the account holder.

VII.

IT IS FURTHER ORDERED that, except as otherwise ordered by this Court, there shall be a continuation of the freeze placed on all monies and assets (with an allowance for necessary and reasonable living expenses to be granted only upon good cause shown by application to the Court with notice to and an opportunity for the SEC to be heard) in all accounts at any bank, financial institution, brokerage firm, third-payment payment processor, held in the name of, for the benefit of, or over which account authority is held by Defendants NTV Financial and/or Nguyen, and/or by Relief Defendant Do, including but not limited to the accounts listed below:

INSTITUTION	ACCOUNT NAME/OWNER	ACCOUNT NO.
Bank Of America	NTV Financial Group Inc.	██████8771
Bank Of America	NTV Financial Group Inc. DBA NTLF (Nguyen Tran Le Fund)	██████-8768
Bank Of America	Richard Nguyen DBA NTV Service Group	██████-1210
JP Morgan Chase	NTV Financial Group Inc.	██████1135
JP Morgan Chase	Mai Do DBA NTV Business Group	██████3619
Wells Fargo Bank	NTV Financial Group Inc. DBA NTLF (Nguyen Tran Le Fund)	██████4464
Wells Fargo Bank	Richard Nguyen	██████8738
Banc of California	Mai Do	██████-2032
US Bank	Richard Nguyen DBA NTV Service Group	██████5338
Simple	Richard Nguyen	██████1511
Charles Schwab	NTV Financial Group Inc.	██████6464
Charles Schwab	Richard Nguyen	██████8787
E*Trade	Mai Do	██████3288
E*Trade	Mai Do	██████1301
E*Trade	Mai Do	██████2529
E*Trade	NTV Financial Group Inc.	██████1412
E*Trade	Richard Nguyen	██████9407
Interactive Brokers	NTV Financial Group Inc.	██████9327

Merrill Lynch	Richard Nguyen	1580
Apex Clearing/Ally Securities	Richard Nguyen	10-11

Any bank, financial institution, brokerage firm, or third-party payment processor shall continue to hold and retain within their control and prohibit the withdrawal, removal, transfer or other disposal of any such funds or other assets except as otherwise ordered by this Court.

VIII.

IT IS FURTHER ORDERED that, except as otherwise ordered by this Court, each of the Defendants Nguyen and NTV Financial and the Relief Defendant Mai Do be and hereby are preliminarily restrained and enjoined from, directly or indirectly: destroying, mutilating, concealing, transferring, altering, or otherwise disposing of, in any manner, any documents, which includes all books, records, computer programs, computer files, data objects existing in any state, computer printouts, contracts, emails, correspondence, memoranda, brochures, or any other documents of any kind in their possession, custody or control, however created, produced, or stored (manually, mechanically, electronically, or otherwise), and any accounts, account passwords, computer passwords, device PINs and passwords, pertaining in any manner to Defendants NTV Financial or Nguyen.

IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that, as provided in Federal Rule of Civil Procedure 65(d)(2), the foregoing paragraph also binds the following who receive actual notice of this Order by personal service or otherwise: (a) Defendants' officers, agents, servants, employees, and attorneys; and (b) other persons in active concert or participation with any of the Defendants or with anyone described in (a).

IX.

IT IS FURTHER ORDERED that Defendants Nguyen and NTV Financial and the Relief Defendant Mai Do remain under a continuing obligation to prepare and

1 deliver to the SEC, by no later than July 8, 2019, a detailed and complete schedule of
2 all of their assets, including all real and personal property exceeding \$5,000 in value,
3 and all bank, securities, and other accounts identified by institution, branch address,
4 and account number. The accounting shall include a description of the sources of all
5 such assets. Such accounting shall be filed with the Court and a copy shall be
6 delivered by email to millerdou@sec.gov and delivered by hand or overnight courier
7 to the SEC to the attention of Douglas M. Miller, Trial Counsel, U.S. Securities and
8 Exchange Commission, Los Angeles Regional Office, 444 South Flower Street, Suite
9 900, Los Angeles, California, 90071, or such other place and person as counsel for
10 the SEC may direct in writing. After completion of the accounting, each of the
11 Defendants shall produce to the SEC at a time agreeable to the SEC, all books,
12 records and other documents supporting or underlying their accounting.

13 **X.**

14 IT IS FURTHER ORDERED that Jeffrey Brandlin is appointed as permanent
15 receiver of Defendant NTV Financial and its subsidiaries and affiliates, and of all
16 bank and brokerage accounts through which Defendants Richard Nguyen's and NTV
17 Financial's investors and/or clients' funds have flowed, including but not limited to
18 the accounts set forth in paragraph VII above (the "Subject Accounts") (collectively
19 with NTV Financial and its subsidiaries and affiliates, the "Receivership Entity"),
20 with full powers of an equity receiver, including, but not limited to, full power over
21 all funds, assets, collateral, premises (whether owned, leased, occupied, or otherwise
22 controlled), choses in action, books, records, papers and other property belonging to,
23 being managed by or in the possession of or control of Defendant NTV Financial, its
24 subsidiaries and affiliates, and/or the Subject Accounts, and that such receiver
25 continue to be authorized, empowered and directed:

- 26 A. to have access to and to collect and take custody, control, possession,
27 and charge of all funds, assets, collateral, premises (whether owned,
28 leased, occupied, or otherwise controlled), choses in action, books,

1 records, papers and other real or personal property, wherever located, of
2 or managed by Defendant NTV Financial, its subsidiaries and affiliates,
3 and/or the Subject Accounts, with full power to sue, foreclose, marshal,
4 collect, receive, and take into possession all such property (including
5 access to and taking custody, control, and possession of all such
6 Defendant NTV Financial property, and that of its subsidiaries and
7 affiliates NTV Financial and/or the Subject Accounts);

8 B. to have control of, and to be added as the sole authorized signatory for,
9 all accounts of the entities in receivership, including all accounts at any
10 bank, title company, escrow agent, financial institution or brokerage firm
11 (including any futures commission merchant) which has possession,
12 custody or control of any assets or funds of Defendant NTV Financial,
13 and that of its subsidiaries and affiliates and the Subject Accounts, or
14 which maintains accounts over which Defendant NTV Financial, its
15 subsidiaries and affiliates, and/or the Subject Accounts have signatory
16 authority;

17 C. to conduct such investigation and discovery as may be necessary to
18 locate and account for all of the assets of or managed by Defendant NTV
19 Financial, its subsidiaries and affiliates and/or the Subject Accounts, and
20 to engage and employ attorneys, accountants and other persons to assist
21 in such investigation and discovery;

22 D. to take such action as is necessary and appropriate to preserve and take
23 control of and to prevent the dissipation, concealment, or disposition of
24 any assets of or managed by Defendant NTV Financial, its subsidiaries
25 and affiliates and/or the Subject Accounts;

26 E. to make an accounting, as soon as practicable, to this Court and the SEC
27 of the assets and financial condition of Defendant NTV Financial, its
28 subsidiaries and affiliates and/or the Subject Accounts, and to file the

1 accounting with the Court and deliver copies thereof to all parties;

2 F. to make such payments and disbursements from the funds and assets
3 taken into custody, control, and possession or thereafter received by him
4 or her, and to incur, or authorize the making of, such agreements as may
5 be necessary and advisable in discharging his or her duties as permanent
6 receiver;

7 G. to employ attorneys, accountants, and others to investigate and, where
8 appropriate, to institute, pursue, and prosecute all claims and causes of
9 action of whatever kind and nature which may now or hereafter exist as
10 a result of the activities of present or past employees or agents of
11 Defendant NTV Financial, its subsidiaries and affiliates and/or the
12 Subject Accounts; and

13 H. to have access to and monitor all mail, electronic mail, and video phone
14 of the entities in receivership in order to review such mail, electronic
15 mail, and video phone which he or she deems relates to their business
16 and the discharging of his or her duties as permanent receiver.

17 **XI.**

18 IT IS FURTHER ORDERED that Defendant NTV Financial, its subsidiaries
19 and affiliates and the Subject Accounts, including all of the other entities in
20 receivership, and their officers, agents, servants, employees and attorneys, and any
21 other persons who are in custody, possession or control of any assets, collateral,
22 books, records, papers or other property of or managed by any of the entities in
23 receivership, shall forthwith give access to and control of such property to the
24 permanent receiver.

25 **XII.**

26 IT IS FURTHER ORDERED that no officer, agent, servant, employee or
27 attorney of Defendant NTV Financial, its subsidiaries and affiliates and/or the Subject
28 Accounts shall take any action or purport to take any action, in the name of or on

1 behalf of Defendant NTV Financial, its subsidiaries and affiliates and/or the Subject
2 Accounts, without the written consent of the permanent receiver or order of this
3 Court.

4 **XIII.**

5 IT IS FURTHER ORDERED that, except by leave of this Court, during the
6 pendency of this receivership, all clients, investors, trust beneficiaries, note holders,
7 creditors, claimants, lessors and all other persons or entities seeking relief of any
8 kind, in law or in equity, from Defendant NTV Financial, its subsidiaries and
9 affiliates and/or the Subject Accounts, and all persons acting on behalf of any such
10 investor, trust beneficiary, note holder, creditor, claimant, lessor, consultant group or
11 other person, including sheriffs, marshals, servants, agents, employees and attorneys,
12 are hereby restrained and enjoined from, directly or indirectly, with respect to these
13 persons and entities:

- 14 A. commencing, prosecuting, continuing or enforcing any suit or
15 proceeding (other than the present action by the SEC or any other action
16 by the government) against any of them;
- 17 B. using self-help or executing or issuing or causing the execution or
18 issuance of any court attachment, subpoena, replevin, execution or other
19 process for the purpose of impounding or taking possession of or
20 interfering with or creating or enforcing a lien upon any property or
21 property interests owned by or in the possession of Defendant NTV
22 Financial, its subsidiaries and affiliates and/or the Subject Accounts; and
- 23 C. doing any act or thing whatsoever to interfere with taking control,
24 possession or management by the permanent receiver appointed
25 hereunder of the property and assets owned, controlled or managed by or
26 in the possession of Defendant NTV Financial, its subsidiaries and
27 affiliates and/or the Subject Accounts, or in any way to interfere with or
28 harass the permanent receiver or his or her attorneys, accountants,

1 employees, or agents or to interfere in any manner with the discharge of
2 the permanent receiver's duties and responsibilities hereunder.

3 **XIV.**

4 IT IS FURTHER ORDERED that Defendant NTV Financial and its
5 subsidiaries and affiliates, and their officers, agents, servants, employees and
6 attorneys, and the Subject Accounts, shall cooperate with and assist the permanent
7 receiver and shall take no action, directly or indirectly, to hinder, obstruct, or
8 otherwise interfere with the permanent receiver or his or her attorneys, accountants,
9 employees or agents, in the conduct of the permanent receiver's duties or to interfere
10 in any manner, directly or indirectly, with the custody, possession, management, or
11 control by the permanent receiver of the funds, assets, collateral, premises, and
12 choses in action described above.

13 **XV.**

14 IT IS FURTHER ORDERED that Defendant NTV Financial and its
15 subsidiaries and affiliates shall pay the costs, fees and expenses of the permanent
16 receiver incurred in connection with the performance of his or her duties described in
17 this Order, including the costs and expenses of those persons who may be engaged or
18 employed by the receiver to assist him or her in carrying out his or her duties and
19 obligations. All applications for costs, fees, and expenses for services rendered in
20 connection with the receivership other than routine and necessary business expenses
21 in conducting the receivership, such as salaries, rent, and any and all other reasonable
22 operating expenses, shall be made by application setting forth in reasonable detail the
23 nature of the services and shall be heard by the Court.

24 **XVI.**

25 IT IS FURTHER ORDERED that no bond shall be required in connection with
26 the appointment of the permanent receiver. Except for an act of gross negligence, the
27 permanent receiver shall not be liable for any loss or damage incurred by any of the
28 defendants, their officers, agents, servants, employees and attorneys or any other

1 person, by reason of any act performed or omitted to be performed by the permanent
2 receiver in connection with the discharge of his or her duties and responsibilities.

3 **XVII.**

4 IT IS FURTHER ORDERED that representatives of the SEC and any other
5 government agency are authorized to have continuing access to inspect or copy any
6 or all of the corporate books and records and other documents of Defendant NTV
7 Financial, its subsidiaries and affiliates and/or the Subject Accounts, and continuing
8 access to inspect their funds, property, assets and collateral, wherever located.

9 **XVIII.**

10 IT IS FURTHER ORDERED that any person who receives actual notice of this
11 Order by personal service or otherwise, and who holds, possesses, or controls assets
12 exceeding \$5,000 for the account or benefit of any of the Defendants, including any
13 digital assets, digital securities, virtual currencies, digital tokens, cryptocurrencies,
14 digital wallets, or other tangible, intangible, or digital assets, wherever located,
15 including any such assets held in any safe deposit box, shall within 5 days of
16 receiving actual notice of this Order provide counsel for the SEC a written statement
17 identifying all such assets, the value of such assets, or best approximation thereof,
18 and any account numbers or account names in which the assets are held.

19 **XIV.**

20 IT IS FURTHER ORDERED that the preliminary hearing scheduled for
21 **July 8, 2019, and briefing schedule related to that hearing are vacated.**

22 //

23 //

XV.

IT IS FURTHER ORDRED that this Court shall retain jurisdiction over this action for the purpose of implementing and carrying out the terms of all orders and decrees which may be entered herein and to entertain any suitable application or motion for additional relief within the jurisdiction of this Court.

IT IS SO ORDERED.

Dated: July 2, 2019


UNITED STATES DISTRICT JUDGE

1 MIKE N. VO (SBN 216340)

2 mvo@mikevolaw.com

3 JULIE H. LIN (SBN 306825)

4 jlin@mikevolaw.com

5 **LAW OFFICES OF MIKE N. VO, APLC**

6 17910 Skypark Circle, Suite 103

7 Irvine, CA 92614

8 TEL: 949-221-8238

9 FAX: 844-394-0129

10 Attorney for Defendants Richard Vu Nguyen a/k/a Nguyen Thanh Vu and Mai Do

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

14
15 **SECURITIES AND EXCHANGE**
16 **COMMISSION,**

17 **Plaintiff,**

18 **vs.**

19 **RICHARD VU NGUYEN, A/K/A**
20 **NGUYEN THANH VU, and NTV**
21 **FINANCIAL GROUP, INC.,**

22 **Defendants,**

23 **and**

24 **MAI DO,**

25 **Relief Defendant**
26 _____
27
28

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

Honorable Andrew J. Guilford

NOTICE OF SUBMISSION OF
DEFENDANTS RICHARD V.
NGUYEN AND MAI DO'S LIST OF
ASSETS PURSUANT TO
PRELIMINARY INJUNCTION
ORDER (Dkt. 25)

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

TO THE HONORABLE COURT, ALL PARTIES, AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that Defendants Richard V. Nguyen and Mai Do hereby submit the following list of real and personal property assets pursuant to the July 3, 2019, Preliminary Injunction Order (Dkt. 25) and Order re: Stipulation to Continue Deadline to Submit List of Assets (Dkt. 31).

I. REAL PROPERTY

Address	Source of Asset
1. [REDACTED] [REDACTED]	[REDACTED] [REDACTED]
2. [REDACTED] [REDACTED]	[REDACTED] [REDACTED]
3. 2506 Monte Carlo Dr., Santa Ana, CA 92706	[REDACTED] [REDACTED]
4. [REDACTED] [REDACTED]	[REDACTED] [REDACTED]

II. PERSONAL PROPERTY

Item	Source of Asset
1. [REDACTED] [REDACTED]	[REDACTED] [REDACTED]
[REDACTED] [REDACTED]	[REDACTED] [REDACTED]
[REDACTED] [REDACTED]	[REDACTED] [REDACTED]

LAW OFFICES OF MIKE N. VO, APLC
17910 Skypark Circle, Suite 103, Irvine, CA 92614

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4.	[REDACTED]	[REDACTED]
		[REDACTED]
	[REDACTED]	[REDACTED]
		[REDACTED]
	[REDACTED]	[REDACTED]
		[REDACTED]
	[REDACTED]	[REDACTED]
		[REDACTED]
	[REDACTED]	[REDACTED]
		[REDACTED]
	[REDACTED]	[REDACTED]
	[REDACTED]	[REDACTED]
	[REDACTED]	[REDACTED]
	[REDACTED]	[REDACTED]
	[REDACTED]	[REDACTED]
	[REDACTED]	[REDACTED]

III. ACCOUNTS

Bank/Account Number	Source of Asset
1. [REDACTED]	[REDACTED]
[REDACTED]	
[REDACTED]	
[REDACTED]	[REDACTED]
[REDACTED]	
[REDACTED]	
[REDACTED]	
[REDACTED]	

10.

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12.	[REDACTED]	[REDACTED]
	[REDACTED]	[REDACTED]
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	[REDACTED]	[REDACTED]
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	[REDACTED]	[REDACTED]
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	[REDACTED]	[REDACTED]
	[REDACTED]	[REDACTED]
17.	[REDACTED]	[REDACTED]
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	[REDACTED]	[REDACTED]
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	[REDACTED]	[REDACTED]
	[REDACTED]	[REDACTED]
	[REDACTED]	[REDACTED]
	[REDACTED]	[REDACTED]
	[REDACTED]	[REDACTED]
	[REDACTED]	[REDACTED]

IV. BUSINESS

Name of Business	Source of Asset
1. Pho [REDACTED]	[REDACTED]
	[REDACTED]

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17910 Skypark Circle, Suite 103, Irvine, CA 92614

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Dated: July 15, 2019

LAW OFFICES OF MIKE N. VO, APLC

/s/Mike N. Vo
Mike N. Vo (SBN 216340)
Attorneys for Defendants Richard Nguyen
and Mai Do

LAW OFFICES OF MIKE N. VO, APLC
17910 Skypark Circle, Suite 103, Irvine, CA 92614

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CERTIFICATE OF SERVICE

I hereby certify that on July 15, 2019, I electronically filed the foregoing
“**NOTICE OF SUBMISSION OF DEFENDANTS RICHARD V. NGUYEN AND MAI
DO’S LIST OF ASSETS**” 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



UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
LOS ANGELES REGIONAL OFFICE
444 S. FLOWER STREET, SUITE 900
LOS ANGELES, CALIFORNIA 90071

DIRECT DIAL: (323) 965-3837
FAX: (213) 443-1904

August 2, 2019

VIA EMAIL & REGULAR MAIL

Mike N. Vo
17910 Skypark Circle, Suite 103
Irvine, California 92614
mvo@mikevolaw.com

Re: Securities and Exchange Commission v. Defendants Richard Vu Nguyen, aka
Nguyen Thanh Vu, and NTV Financial Group, Inc., and Relief Defendant Mai
Do, Case No. 19-cv-01174-AG-KES

Dear Mr. Vo:

It has come to our attention that on or about July 31, 2019, the property located at 2506 Monte Carlo Dr #3, Santa Ana, CA 92706, which your clients recently listed in their accounting of assets as their real property, was listed for sale.

The asset freeze included in the Court's July 2, 2019 Preliminary Injunction and Orders (1) Freezing Assets; (2) Requiring Accountings; (3) Prohibiting the Destruction of Documents; (4) and Appointing a Permanent Receiver, states that "all monies and assets" of defendants Richard Vu Nguyen, also known as Nguyen Thanh Vu, and NTV Financial Group, Inc., as well as the monies and assets of Relief Defendant Mai Do, continue to be frozen.

Mike N. Vo
August 2, 2019
Page 2

If Richard Vu Nguyen or Mai Do are asserting a contrary interpretation of the asset freeze and the preliminary injunction provisions, please let me know immediately; otherwise, we presume any efforts by your clients to sell this property will cease immediately.

Sincerely,



DOUGLAS M. MILLER
Senior Trial Counsel

Enclosure(s)

cc: Kyra Andrassy, Esq.
Jeffrey Brandlin, CPA