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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

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.

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

**PLAINTIFF SECURITIES AND
EXCHANGE COMMISSION'S
NOTICE OF MOTION AND MOTION
FOR MONETARY REMEDIES
AGAINST DEFENDANT RICHARD
VU NGUYEN AND RELIEF
DEFENDANT MAI DO**

Date: October 16, 2023

Time: 1:30 p.m.

Ctrm: 10A

Judge: Hon. Stephen V. Wilson

**TO THE CLERK OF THE COURT AND TO THE DEFENDANT AND
RELIEF DEFENDANT:**

PLEASE TAKE NOTICE that plaintiff Securities and Exchange Commission (“SEC”) will, and hereby does, move for Monetary Remedies Against Defendant Richard Vu Nguyen and Relief Defendant Mai Do. Specifically, in addition to requesting the Court re-enter the injunctive relief it previously ordered against Nguyen (Dkt. 107), the SEC is requesting the following relief be entered by the Court in the SEC proposed judgments:

- For Nguyen to be ordered to: (1) pay disgorgement in the amount of \$969,210.07, plus prejudgment interest thereon of \$164,313.57 (or a total of \$1,133,523.63), (2) pay a civil monetary penalty of \$1,133,523.63, and (3) refrain from accessing any securities brokerage accounts of any third party; and
- For Do to be ordered to pay disgorgement in the amount of \$267,889.64, plus prejudgment interest thereon of \$50,899.12 (or a total of \$318,788.76). The SEC further seeks an order holding Nguyen jointly and severally liable for Do’s disgorgement and prejudgment interest amounts (\$318,788.76).

Copies of the SEC’s proposed judgments are being served on you together with this Notice.

The SEC’s motion is based upon the accompanying Memorandum of Points and Authorities; the Declaration of Jeffrey Brandlin; the filings and records in this action; and any other evidence or argument the SEC may present in support of the motion. In order to oppose the motion, you must file with the Court and serve on the SEC a written opposition no later than **September 25, 2023**.

PLEASE TAKE FURTHER NOTICE that the motion will be heard at **1:30 p.m. on October 16, 2023, or as soon thereafter as practicable**, in Courtroom 10A before the Hon. Stephen V. Wilson, United States District Judge for the United States

1 District Court for the Central District of California, at the First Street Courthouse,
2 350 West First Street, Los Angeles, California 90012.

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4 Dated: September 14, 2023

Respectfully submitted,

5 /s/ Douglas M. Miller

6 DOUGLAS M. MILLER

7 Attorney for Plaintiff

8 Securities and Exchange Commission
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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 September 14, 2023, I caused to be served the document entitled **PLAINTIFF SECURITIES AND EXCHANGE COMMISSION'S NOTICE OF MOTION AND MOTION FOR MONETARY REMEDIES AGAINST DEFENDANT RICHARD VU NGUYEN AND RELIEF DEFENDANT MAI DO** 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: September 14, 2023

/s/ Douglas M. Miller

Douglas M. Miller

SEC v. Richard Vu Nguyen, et al.
United States District Court—Central District of California
Case No. 8:19-cv-01174-SVW-KES

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