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8 SUPERIOR COURT OF THE STATE OF CALIFORNIA

9 FOR THE COUNTY OF ORANGE

10 THE PEOPLE OF THE STATE OF
CALIFORNIA, by and through the
11 CALIFORNIA CORPORATIONS
COMMISSIONER,

12 Plaintiff,

13 vs.
14

15 TURAN PETROLEUM, INC., a Nevada
corporation; NRG RESOURCES, INC., a
16 Nevada corporation; HIEP TRINH, aka ALEX
TRINH, an individual; ANATOLY VANETIK,
17 aka TONY VANETIK, an individual; MITCH
18 NGO, an individual; and DOES 1 through 10,
inclusive,

19 Defendants.
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Case No.: 30-2010-00389990-CU-SL-CJC

**STIPULATION TO ENTRY OF
PRELIMINARY INJUNCTION BETWEEN
PLAINTIFF AND DEFENDANTS TURAN
PETROLEUM, INC.; NRG RESOURCES,
INC.; HIEP TRINH, aka ALEX TRINH;
ANATOLY VANETIK, aka TONY
VANETIK; and MITCH NGO**

21 It is hereby stipulated by Defendants Turan Petroleum, Inc.; NRG Resources, Inc.; Hiep
22 Trinh, aka Alex Trinh; Anatoly Vanetik, aka Tony Vanetik; and Mitch Ngo (collectively,
23 “DEFENDANTS”) as follows:

24 Without admitting or denying any liability, DEFENDANTS stipulate to entry of a
25 Preliminary Injunction on the following terms:

- 26 1. DEFENDANTS and their agents, officers and employees shall be and are hereby
27 preliminarily enjoined from engaging in, committing, aiding and abetting, or performing directly
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1 or indirectly any of the following acts:

- 2 a. Violating California Corporations Code section 25110;
- 3 b. Violating California Corporations Code section 25401;
- 4 c. Removing, destroying, mutilating, concealing, altering, transferring, or otherwise
5 disposing of any “writing” or “document” defined under California Evidence Code section
6 250, relating to the transactions and course of conduct as alleged in the Complaint filed in
7 this action, that are in the possession, custody, or control of DEFENDANTS, for a period
8 of four years from the date of the entry of the preliminary injunction.

9 2. DEFENDANTS agree and acknowledge that nothing in this Stipulation shall
10 preclude the Commissioner or his agents, officers, or employees, to the extent authorized by law,
11 from referring any evidence or information regarding this matter to any district attorney or any
12 other state or federal law enforcement official, or from assisting, cooperating, or co-prosecuting
13 with regards to any investigation and/or action brought by any other federal, state, or county
14 agency. DEFENDANTS further agree and acknowledge that nothing in this Stipulation shall bind
15 or otherwise prevent any other federal, state, or county agency from performing its duties.

16 3. If any paragraph, clause, or provision of this Stipulation is held invalid or
17 unenforceable, such decision shall affect only the paragraph, clause or provisions so construed or
18 interpreted, and the invalidity shall not affect the valid provisions of this Stipulation, which can be
19 severable and given effect without the invalid provisions.

20 4. This Stipulation may be executed in one or more separate counterparts, each of
21 which when so executed, shall be deemed an original. Such counterparts shall together constitute
22 and be one and the same instrument.

23 5. DEFENDANTS consent to this Stipulation without admitting or denying any
24 liability. The parties further represent that they shall not introduce, rely on or otherwise insinuate
25 to the Court or the public that the entry of the Stipulation supports, opposes or affects the
26 remaining disputed section (D)’s asset freeze prayed for in Plaintiff’s Motion for Preliminary
27 Injunction.

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Defendant NRG RESOURCES, INC.

Dated: 02/03/2011 By: _____

Defendant HIEP TRINH, aka ALEX TRINH

Dated: 2-1-11 _____
HIEP TRINH

Defendant ANATOLY VANETIK, aka TONY VANETIK

Dated: 02/03/2011 _____
ANATOLY VANETIK

Defendant MITCH NGO

Dated: FEB.03.11 _____
MITCH NGO