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11 **UNITED STATES DISTRICT COURT**  
 12 **CENTRAL DISTRICT OF CALIFORNIA**  
 13

SACV07-579 CJC (ANx)

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

16 **Plaintiff,**

17 **vs.**

18 **TG CAPITAL LLC, a Nevada limited**  
**liability company, THANH VIET**  
 19 **"JEREMY" CAO, an individual, and**  
 20 **LODAVINA GROSNICKLE, an**  
**individual,**

21 **Defendants.**

Case No.

**COMPLAINT FOR VIOLATIONS  
OF THE FEDERAL SECURITIES  
LAWS**

22  
23 Plaintiff Securities and Exchange Commission ("Commission") alleges as  
24 follows:

25 **JURISDICTION AND VENUE**

26 1. This Court has jurisdiction over this action pursuant to Sections 20(b),  
 27 20(d)(1), and 22(a) of the Securities Act of 1933 ("Securities Act"), 15 U.S.C. §§  
 28 77t(b), 77t(d)(1), & 77v(a), and Sections 21(d)(1), 21(d)(3)(A), 21(e), and 27 of

1 the Securities Exchange Act of 1934 (“Exchange Act”), 15 U.S.C. §§ 78u(d)(1),  
2 78u(d)(3)(A), 78u(e), & 78aa. Defendants have, directly or indirectly, made use of  
3 the means or instrumentalities of interstate commerce, of the mails, or of the  
4 facilities of a national securities exchange in connection with the transactions, acts,  
5 practices, and courses of business alleged in this complaint.

6 2. Venue is proper in this district pursuant to Section 22(a) of the  
7 Securities Act, 15 U.S.C. § 77v(a), and Section 27 of the Exchange Act, 15 U.S.C.  
8 § 78aa, because certain of the transactions, acts, practices, and courses of business  
9 constituting violations of the federal securities laws occurred within this district.

### 10 SUMMARY

11 3. This matter involves the ongoing fraudulent offer and sale of  
12 membership units of TG Capital, LLC, a Nevada limited liability company (“TG  
13 Capital”), by its principals, Thanh Viet Jeremy Cao (“Cao”) and Lodavina  
14 Grosnickle (“Grosnickle”) (TG Capital, Cao, and Grosnickle are hereinafter  
15 collectively “defendants”). To date, defendants have raised at least \$3.78 million  
16 from approximately 33 investors. TG Capital purports to offer private investment  
17 products with guaranteed rates of return.

18 4. Since February 2007, defendants have solicited investors to purchase  
19 membership units in TG Capital by representing that TG Capital invests in gold,  
20 lends money to banks, and invests in banking instruments secured by gold or  
21 guaranteed by Wells Fargo Bank, UBS, or Bank Negara Indonesia (“BNI”).  
22 Defendants have promised investors guaranteed rates of return ranging between  
23 28% and 30%.

24 5. These promises are all materially misleading. First, none of the banks  
25 identified by defendants secured or provided the products purportedly offered by  
26 TG Capital. Second, TG Capital has not purchased or invested in gold.

27 6. To support defendants’ misrepresentations, Cao forged a document on  
28 Wells Fargo letterhead that references a Wells Fargo bank guarantee. In addition,

