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US BANKRUPTCY COURT
DISTRICT OF DELAWARE

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

IN RE: CHAPTER 11
ALLIED NEVADA CASE No. 15-10503(MFW)
GOLD CORP,et al.,¹ Jointly Administered
DEBTORS

**BRIEF IN SUPPORT OF BRIAN TUTTLE’S MOTION TO APPOINT AN
EXAMINER WITH ACCESS TO AND AUTHORITY TO DISCLOSE
PRIVILEGED MATERIALS**

COMES NOW, party of interest: Jordan Darga files this brief in support of Brian Tuttle’s Motion to Appoint an Examiner With Access To and Authority to Disclose Privileged Materials and as grounds states the following:

¹ The Debtors(“Debtors”) in these cases, along with the last 4 digits of each Debtor’s federal tax identification number, are: Allied Nevada Gold Corp.(7115); Allied Nevada Gold Corp Holdings LLC (7115); Allied VGH Inc. (3601); Allied VNC Inc. (3291); ANG Central LLC (7115); ANG Cortez LLC (7115); ANG Eureka LLC(7115); ANG North LLC (7115); ANG Northeast LLC (7115); ANG Pony LLC (7115); Hasbrouck Production Company LLC (3601); Hycroft Resources and Development, Inc. (1989); Victory Exploration Inc.(8144); and Victory Gold Inc.(8139). The corporate headquarters for each of the following are located at, and the mailing address for each of the following of each of the above debtors, except Hycroft Resources & Development, Inc., is 9790 Gateway Drive, Suite 200, Reno, Nevada 89521. The mailing address for Hycroft Resources & Development, Inc. is P.O. Box 3030, Winnemucca, NV 89446.

STATEMENT OF FACTS

1. On 8/11/2015, Brian Tuttle filed with This Court: MOTION TO APPOINT AN EXAMINER WITH ACCESS TO AND AUTHORITY TO DISCLOSE PRIVILEGED MATERIALS.
2. On 8/21/2015, Debtors filed NOTICE OF RESCHEDULED OMNIBUS HEARING.
3. Upon information and belief, Mr. Tuttle's MOTION TO APPOINT AN EXAMINER WITH ACCESS TO AND AUTHORITY TO DISCLOSE PRIVILEGED MATERIALS will be heard at the 9/11/2015 Omnibus Hearing.

BACKGROUND

4. My name is Jordan Darga and I am in shock that I am filing a brief. This will probably not be your typical brief. I have no legal experience so I just speak the truth and leave it at that.

I am a lowly investor, probably the lowliest of them all, seeing that most investors have money to invest, whereas I had to take out a loan in order to be able to invest.

I took out a loan of \$30,000 (borrowing against my home) and ended up with a total of about 14,000 shares. When the company filed for bankruptcy, I could not believe it, and knew that it would be impossible for them to get away with cancelling our shares because of the tremendous amount of equity in the Hycroft mine alone. So I took advantage of the price drop and took out another loan of \$3,000 to almost triple my holdings.

This was to be my family's retirement investment and the reason I chose gold is because there is true value in gold. When buying a mining company, investors typically look for undervalued companies so that is exactly what I did. Little did I know that management had a plan of their own for shareholders, and it wasn't long term like mine.

ARGUMENT IN SUPPORT OF MOTION TO APPOINT AN EXAMINER
WITH ACCESS TO AND AUTHORITY TO DISCLOSE PRIVILEGED
MATERIALS

5. The following is Quarter 3 of 2014's financial statement released this year on JAN 21st. 2015, just 2 short months prior to filing for volunteer bankruptcy.

----- Note the increase in gold production and doubling of silver production.

**Allied Nevada Announces Preliminary Full Year 2014
Gold and Silver Sales Increase 19% and 115%,
Respectively, Year-Over-Year**



Allied Nevada Gold Corp. January 21, 2015 8:45 AM

RENO, NEVADA--(Marketwired - Jan 21, 2015) - **Allied Nevada Gold Corp. ("Allied Nevada" or the "Company") (ANV.TO)(NYSE MKT:ANV)** provides full year preliminary production and sales for 2014 and an update on the status of the mill expansion financing process. In 2014, we increased production by 12% for gold and more than doubled the silver production compared with 2013. Full year 2014 production and sales, as compared with 2013, were as follows:

	Years ended		2014 vs 2013	
	December 31,		Increase	
	2014	2013		
SALES				
Gold ounces	216,937	181,941	19	%
Silver ounces	1,841,737	858,073	115	%
PRODUCTION				
Gold ounces	214,345	190,831	12	%
				%
Silver ounces	1,818,637	882,225	106	

----- The following was also taken from this press release

We anticipate 2015 operating results to be very similar to 2014 in terms of production and sales, with our focus continuing to be on improving mining efficiencies and costs.

----- This press release was released just two months prior to filing for bankruptcy. To put into perspective the amount that management is claiming that ANV is worth, if the price of gold is \$1000, and the price of silver is \$13 per oz (both well below current market value), the sales from 2014 alone would be \$214M in revenue for gold and \$23M in silver. They are claiming that their entire company is worth slightly more than this amount when they have a mine that has more than 10 million oz of gold, and 460 million oz of silver.

6. The most pain comes from watching management attempt to devalue and dispose of assets as fast as they can and claim that shareholder equity just disappeared. This is not only defrauding shareholders but it is a blatant attempt to defraud the bankruptcy system and the courts. Such a bold statement is backed by their own financial statement records (see below). It is their own admission of shareholder equity and company value.

Note that the difference in stockholder's equity in 1 year from 2013 to 2014 is reasonable. However, the difference in less than 1 yr. from Sept 30th 2014 to what they are claiming today (\$0) is absurd. I am not an intelligent man, but even I can see they are trying to pull a fast one here.

PART I – FINANCIAL INFORMATION

ITEM 1. FINANCIAL STATEMENTS

ALLIED NEVADA GOLD CORP.
CONDENSED CONSOLIDATED BALANCE SHEETS
(US dollars in thousands)

Please see the red arrow below:
 Total assets - total liabilities = stockholder's equity

	(Unaudited) September 30, 2014	December 31, 2013
Assets:		
Cash and cash equivalents	\$ 5,799	\$ 81,470
Accounts receivable	1,804	8,227
Inventories - Note 3	23,726	26,410
Ore on leachpads, current - Note 4	188,263	206,504
Prepays and other - Note 5	6,652	10,857
Assets held for sale	45,564	47,357
Deferred tax assets, current	31,159	22,943
Current assets	302,967	403,768
Restricted cash - Note 6	48,140	41,215
Stockpiles and ore on leachpads, non-current - Note 4	121,724	116,192
Other assets, non-current - Note 5	11,913	12,682
Plant, equipment, and mine development, net - Note 7	864,745	890,271
Mineral properties, net - Note 8	45,030	48,473
Total assets	\$ 1,394,519	\$ 1,512,601
Liabilities:		
Accounts payable	\$ 38,745	\$ 67,958
Interest payable	12,481	3,402
Other liabilities, current - Note 9	7,159	8,512
Debt, current - Note 10	71,157	76,226
Asset retirement obligation, current	20	20
Current liabilities	129,562	156,118
Other liabilities, non-current - Note 9	41,498	22,735
Debt, non-current - Note 10	472,165	522,427
Asset retirement obligation, non-current	16,161	15,344
Deferred tax liabilities, non-current	8,225	18,928
Total liabilities	667,611	735,552
Commitments and Contingencies - Note 20	The difference in 1 year from 2013 to 2014 is reasonable.	
Stockholders' Equity:	However, the difference in less than 1 yr. from Sept 30th 2014 to what they are claiming now is absurd. I am not an intelligent man, but even I can see they are trying to pull a fast one here.	
Common stock, \$0.001 par value	104	104
Shares authorized: 200,000,000		
Shares issued and outstanding: 104,438,336 and 104,043,169, respectively		
Additional paid-in-capital	754,991	750,119
Accumulated other comprehensive income - Note 18	4,367	1,674
(Accumulated deficit) retained earnings	(32,554)	25,152
Total stockholders' equity	726,908	777,049
Total liabilities and stockholders' equity	\$ 1,394,519	\$ 1,512,601

The accompanying notes are an integral part of these statements.

As illustrated above, it is obvious that management is on a time crunch to drop the value of ANV as fast as they can and for good reason. A company with major stockholder equity should not be filing for bankruptcy.

7. Management is trying to give themselves a fresh start by devaluing our assets, and then giving those devalued assets to debt holders, effectively stealing from us. It's clear by their management incentive plan and their lack of 'current shareholder relief' plan what their true intentions are.

8. It's even more clear when they used this terminology like this in their plan: *'If the company is traded on an exchange, then the warrants will be cashless'*, which gives ANV the option to go private, and current shareholder warrants will be worthless.

Wow did I go through the wrong door and at the absolutely worst time. Someone was waiting to take my shares before I even bought them. I had no idea and there was nothing I could do but not sell. Well I refuse to sell and continue to suffer the pain of watching the stock down more than 99%. The sad thing is that management doesn't care because they will not rest until they get our shares either way. They have the legal expertise to do so but I do not know anything about the law and lack the resources to hire Morgan and Morgan or I would have hired them.

9. What really scares me is that the EC is now trying to have a valuation done but yet the EC already agreed with management to not disagree with management. This is a huge conflict of interest and looks as if they are in a race to do a valuation so that they can object to us doing our own valuation claiming that it is not necessary because one was already done by them. They are very sneaky.

10. We are suffering from the EC's deal with management.

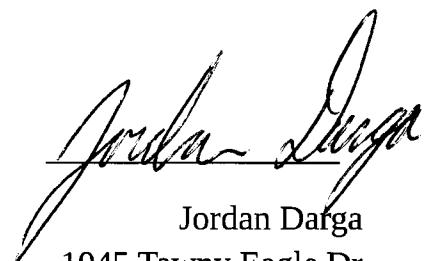
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11. There are many more reasons why I support Mr. Tuttle's arguments but I was trying to keep this as brief as possible. Now I hope I did not offend anyone. The best outcome for this case is that this bankruptcy petition gets denied all together and a new honest management is appointed to lead ANV. Unfortunately I can not make this decision, and therefore have to settle for whatever this court decides. If we absolutely have to settle for a deal, I just want a fair deal since there is tremendous stockholder equity in ANV.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by email to the following this the 31st day of August, 2015:

fatell@blankrome.com idizengoff@akingump.com pdublin@akingump.com
debaecke@blankrome.com afreeman@akingump.com mfagen@akingump.com
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