

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

FILED
2015 SEP -4 AM 10:18

CLERK
US BANKRUPTCY COURT
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: Ahmad Ellassadi 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 Ahmad Ellassadi, work in Manassas Virginia as an Industrial Engineer. I am married with one kid. Although I have a stable job so far, being able to support my family (wife and kids) and my disabled parents while paying my student loans is very challenging. I graduated in 2009 where it took me 1 and ½ years to find my current job. During the time I waited to find a career job, I have exhausted all my credit cards lines and added more debts in order to survive and pay my dues. One year back, I decided to go back to school, so took a loan and started attending George Mason University in Virginia to complete my Master's degree in Operations Research hoping for an improved turn in life and career.

I am not here to blame or point fingers at anyone due to the choices I made in life. We have to work hard to earn, and we have to be patient to see results. Sometimes, as any human beings would normally do, we make decisions and maybe risks in life, hoping for constructive results. On October 2014, I decided to invest money so I can bring in a decent down payment for a house (1st time buyer) which my wife and I always dreamt to do.

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

5. This is not the first time for ANV's senior executives to be sued for fraud and misleading statements regarding ANV's financial performance and future prospects. Back in April 3rd, 2014 (I only came to know this post BK) there was class action which commenced in the United States District of Nevada against ANV. Currently, "the Debtor NOW", claims it's not generating the cash flow necessary to proceed with the construction of the Hycroft Mill; production cost, or overall operations. Funny, around 8 months ago (January 2015), ANV's executives, falsely, stated strong financial predictions and a "more" secured position than the year earlier. Guess what? 2 months later they declare bankruptcy!

My brief story with ANV stock: at my level of knowledge, I didn't see obvious risks or red flags with ANV. I decided to invest the money I saved, given they have one of the biggest mine in USA and one of the cheapest producers of Gold. I started with few thousand shares back in October 2014 and kept riding the roller coaster ever since until the bankruptcy. Now, I am, as many shareholders, watching our hard-earned money being sucked by white collar criminals, or do we call them professionals nowadays? How could more than \$1B Asset Company become less than quarter of a million dollars in less than 6 months? To add salt to the pain, total number of hours spent on actually evaluating the mine's worth was less than 10 hours. This was how much they billed the Debtor for, the rest of the

hours billed, and were, hmm let me think...cooking the books you may say. Mr. Tuttle's motion details suspicious actions committed by Debtor over the past years,

Now I own an excess of 87000 shares with my savings and father's life savings in jeopardy. To some, it may not be significant, but for us and the circumstances we live in, it's very substantial and could be devastating.

I kindly urge this honorable court to take a deeper look at the debtor's case and understand the motive and what transpired here. At the end, I want a fair and just rule where we all can live comfortably with ourselves.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by email to the following this on the 3rd day of September, 2015:

fatell@blankrome.com idizengoff@akingump.com pdublin@akingump.com
debaecke@blankrome.com afreeman@akingump.com mfagen@akingump.com
tarr@blankrome.com kthomas@mcdonaldcarano.com Tiiara.Patton@usdoj.gov



Ahmad Ellassadi

7610 Wedgewood Drive
Manassas VA, 20109
614-607-3347
aelassadi@gmail.com