

FILED

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

2015 SEP 24 AM 9:39

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

OBJECTION TO THE DEBTORS PLAN OF REORGANIZATION

COMES NOW, party of interest: Jordan Darga files this objection to the debtor's plan of reorganization, known as the "August Plan" 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. My name is Jordan Darga and I previously filed a brief in support of Mr. Brian Tuttle's motion to appoint an examiner.

2. Today is September 21st, and I along with many others (that I know of) still have not received notification from our brokers to vote in this matter. How can we vote if we haven't received our ballots yet? If it wasn't for the yahoo message board, to this day I would not even know that a voting session is in progress. This is ample evidence to suggest that many shareholders are not rightfully being given notification and sufficient time to receive their ballots which will cause the vast majority of votes to be defaulted to YES. This is an outrage.

3. The legalese in docket #1024, specifically "The New Warrant Agreement", even with the formulas, is not easy to understand for the typical investor and many shareholders are suffering duress by being forced to vote yes for fear that if they vote NO, they will not receive warrants.

4. Many investors have a different understanding regarding the following: 1. What is the strike price on the warrants? 2. What is the cashless option in laymen terms? 2a. Why would someone exercise the cashless option over the payment option? 2b. What are the pros and cons of each? 2c. If investors chose the cashless option, do they have to pay for exercising their warrants even though the payment will not come from additional funds out of their pockets? 2d. If so, where is this money coming from? Is management taking a percentage of our warrants and selling them on the open market to receive payment? **Investors must have this information in order to make an intelligent voting decision.**

5. Many shareholders are ignorant of docket #1024, which means they have yet to know the details of the "New Warrant Agreement". I first received notification of this docket on September 19th. Shareholders can not be expected to vote on something that they have not read.

6. The warrant offer to current shareholders is insulting. In my particular case, I took out a \$30,000, 5 Year, \$552 per month loan to purchase shares of Allied Nevada because ANV stated in their own quarterly and annual report filings that there is over 700M in stockholder equity. ***Please see the comments on the corporate filing on the next page.***

PAGE INTENTIONALLY LEFT BLANK

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		
Stockholders' Equity:		
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 difference 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 now is absurd. I am not an intelligent man, but even I can see they are trying to pull a fast one here.

stockholder's equity as of 9/30/2014

The accompanying notes are an integral part of these statements.

7. There is enough equity for all parties to be treated fair. Hycroft alone has more than 10 million oz of gold, and 460 million oz of silver. If you price gold at only \$1000 per oz (current market value on 9/21/15 is ~\$1100) and silver at only \$13 per oz (current market value is ~\$15), that is a total of almost \$16 Billion dollars.

10M oz gold * \$1,000 = \$10,000,000,000 (10 Billion USD in gold)

+

460M oz silver * \$13 = \$5,980,000,000 (5.9 Billion USD in silver)

=

\$15.9 Billion USD

See paragraph #16 for proposed fair treatment.

PAGE INTENTIONALLY LEFT BLANK

8. Management has an obligation to provide accurate information in their annual and quarterly reports so that we can make sound investment decisions. Taking advantage of this privileged position should not be treated lightly.

9. We would be foolish to breeze through Docket # 1024, (662 pages) and blindly agree to what is written in such a short time period.

10. I am an PHP developer and I dully understand the legalese presented in these pages. This is not fair, not just, and against everything to do with the foundation of our justice system to expect anyone to read through and digest this amount of information in such a short time period.

11. When a company swears that they testify that their accounting documents are correct, the public makes decisions to invest based on the written word of management. Management must be held responsible for misleading all those that have purchased shares and all shareholders must receive relief accordingly. This court system is in place to prevent corporations from taking advantage of the little guy.

PAGE INTENTIONALLY LEFT BLANK

12. Everyone in this court is aware that Mr. Brian Tuttle filed a motion to appoint an examiner. But maybe everyone is not aware that Mr. Brian Tuttle is no longer fighting this case. Many do not know that he received death threats before and after the September 11, 2015 hearing. Mr. Tuttle had the luxury of being able to show up in court whereas the rest of us laymen do not have that luxury. We work full time jobs and therefore can not make ourselves available as Mr. Tuttle did. **IT IS UP TO THIS COURT, TO DETERMINE WITHIN IT'S HEART THAT THIS IS WHY IT REIGNS. TO SIFT BETWEEN NOISE AND FACTS AND GET TO THE HEART OF THE TRUTH AND RULE ACCORDINGLY.**

13. It is absolutely ridiculous that a corporation with money and the right connections can get away with something so subtly undertaken that it even flies by the judicial system untouched by examination. It's a drug lord's dream, a bank robber's fantasy, and ANV's reality if our Honorable Judge Mary F. Walrath does not intervene.

14. Lawsuits will be filed because of this case and any of us that show up missing or killed that is related to this case, let it be known today that everyone will be accounted for. Just because someone has money and excellent legal representation, shouldn't mean they can do as they please.

15. If management is going to steal from us, then we should not have a say in the matter (which is exactly what is happening). But this should not be a case of theft where one party takes from another. This should be a case of an organization reorganizing itself so that all parties that held a stake will continue to hold a stake in the new organized company.

16. IN ORDER FOR THIS PLAN OF REORGANIZATION TO BE FAIR AND JUST TO ALL PARTIES, EACH SHARE HOLDER OF ANV SHOULD RECEIVE AT MINIMUM (½) SHARE OF THE NEW REORGANIZED ANV FOR EVERY SHARE THEY CURRENTLY HOLD.

Shareholders deserve more than warrants. We are the reason why ANV management receives a pay check. We are the reason why Hycroft has advanced as far as it has. We are the real owners of ANV and management is simply put in charge to steer the ship, swearing to look out for shareholder's best interest and in turn they get paid a handsome salary for doing so. Giving us warrants is spitting in our faces. Management knows that the value exists to provide us with (1/2) share of the newly organized ANV for every share of ANV that we currently own.

17. Management must put themselves in our shoes, and look at this situation as if their own personal bank accounts are empty. If they could do that, they would see how unjust this really is.

18. In 2010 when I filed bankruptcy as an individual citizen there were processes in place to prevent me from defrauding the court. Yet I was only worth at most \$5,000. How much greater of a process should be in place when large billion dollar companies voluntarily file for bankruptcy? Apparently, there is no process in place because no defense thus far has led this court to examine the debtors.

19. Now, I beg this court to consider the reality of this case and look beyond the perfection of ANV's legal representation and ask that management negotiates with us for a truly fair deal for all parties. Nothing less than a fair deal is acceptable. Not only is management raping us, but they are leaving us without our undergarments.

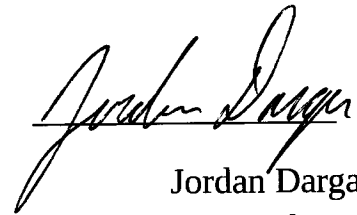
FILED

CERTIFICATE OF SERVICE

2015 SEP 24 AM 9:39

I HEREBY CERTIFY that a true and correct copy of the foregoing ^{CLERK} has been ^{COURT} furnished by email to the following this the 21st day of September, 2015: ^{DISTRICT OF DELAWARE}

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



Jordan Darga
1045 Tawny Eagle Dr
Groveland, Fl 34736
407-616-1286
darga33@gmail.com