



DIVISION OF
CORPORATION FINANCE

UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
WASHINGTON, D.C. 20549

January 16, 2018

James S. Hogg
Brouse McDowell
jhogg@brouse.com

Re: Avalon Holdings Corporation
Incoming letter dated December 22, 2017

Dear Mr. Hogg:

This letter is in response to your correspondence dated December 22, 2017 concerning the shareholder proposal (the "Proposal") submitted to Avalon Holdings Corporation (the "Company") by Anil C. Nalluri (the "Proponent") for inclusion in the Company's proxy materials for its upcoming annual meeting of security holders. Copies of all of the correspondence on which this response is based will be made available on our website at <http://www.sec.gov/divisions/corpfin/cf-noaction/14a-8.shtml>. For your reference, a brief discussion of the Division's informal procedures regarding shareholder proposals is also available at the same website address.

Sincerely,

Matt S. McNair
Senior Special Counsel

Enclosure

cc: Anil C. Nalluri
5500 Market Street, Suite 128
Youngstown, OH 44512

January 16, 2018

Response of the Office of Chief Counsel
Division of Corporation Finance

Re: Avalon Holdings Corporation
Incoming letter dated December 22, 2017

The Proposal nominates the Proponent for membership on the Company's board of directors.

There appears to be some basis for your view that the Company may exclude the Proposal under rule 14a-8(i)(8)(iv), as seeking to include a specific individual in the Company's proxy materials for election to the Company's board of directors. Accordingly, we will not recommend enforcement action to the Commission if the Company omits the Proposal from its proxy materials in reliance on rule 14a-8(i)(8)(iv). In reaching this position, we have not found it necessary to address the alternative basis for omission upon which the Company relies.

Sincerely,

Evan S. Jacobson
Special Counsel

DIVISION OF CORPORATION FINANCE INFORMAL PROCEDURES REGARDING SHAREHOLDER PROPOSALS

The Division of Corporation Finance believes that its responsibility with respect to matters arising under Rule 14a-8 [17 CFR 240.14a-8], as with other matters under the proxy rules, is to aid those who must comply with the rule by offering informal advice and suggestions and to determine, initially, whether or not it may be appropriate in a particular matter to recommend enforcement action to the Commission. In connection with a shareholder proposal under Rule 14a-8, the Division's staff considers the information furnished to it by the company in support of its intention to exclude the proposal from the company's proxy materials, as well as any information furnished by the proponent or the proponent's representative.

Although Rule 14a-8(k) does not require any communications from shareholders to the Commission's staff, the staff will always consider information concerning alleged violations of the statutes and rules administered by the Commission, including arguments as to whether or not activities proposed to be taken would violate the statute or rule involved. The receipt by the staff of such information, however, should not be construed as changing the staff's informal procedures and proxy review into a formal or adversarial procedure.

It is important to note that the staff's no-action responses to Rule 14a-8(j) submissions reflect only informal views. The determinations reached in these no-action letters do not and cannot adjudicate the merits of a company's position with respect to the proposal. Only a court such as a U.S. District Court can decide whether a company is obligated to include shareholder proposals in its proxy materials. Accordingly, a discretionary determination not to recommend or take Commission enforcement action does not preclude a proponent, or any shareholder of a company, from pursuing any rights he or she may have against the company in court, should the company's management omit the proposal from the company's proxy materials.



December 22, 2017

By email at shareholderproposals@sec.gov

U.S. Securities and Exchange Commission
Division of Corporation Finance
Office of Chief Counsel
100 F Street, NE
Washington, DC 20549

Re: Avalon Holdings Corporation
Rule 14a-8(j) -- Exclusion of Stockholder Proposal

Dear Ladies and Gentlemen:

We are counsel to Avalon Holdings Corporation, an Ohio corporation ("*Avalon*" or the "*Company*"). On November 20, 2017, Avalon received the facsimile transmission attached hereto as Exhibit A (the "*Initial Proposal*"), which included two separate letters from Dr. Anil C. Nalluri (the "*Proponent*" or "*Dr. Nalluri*"). The Initial Proposal included two separate letters requesting that the Company include two separate shareholder proposals in the Company's 2018 proxy materials ("*2018 Proxy Materials*") to be distributed to the Company's shareholders in connection with its 2018 Annual Meeting of Shareholders. One proposal was a nomination of the Proponent as a nominee for Class A Director, together with a supporting statement. The other proposal was a resolution directing the Board of Directors of the Company to retain an investment bank to solicit offers for the sale of the Company's stock or assets, together with a supporting statement.

On November 24, 2017, the last day for timely receipt of shareholder proposals by the Company, as specified in the Company's 2017 Proxy Statement, the Company received the facsimile transmission attached hereto as Exhibit B, which consisted of a copy of the form of an Amendment 28 to the Proponent's Schedule 13D ("*Amendment 28*"). At the time of the receipt, Amendment 28 does not appear to have been accepted for filing by the Securities and Exchange Commission (the "*Commission*") on the EDGAR system. Included in Amendment 28, as "Item 8 Submission of Shareholders Proposals for 2018 Proxy Statement [sic]," was a revised proposal (the "*November 24 Proposal*") which included a revised combined version of the proposals contained in the Initial Proposal, together with a revised supporting statement relating to the combined proposals.

On November 29, 2017, the Company sent a letter to the Proponent by facsimile and by Federal Express, a copy of which is attached hereto as Exhibit C (the "**Procedural Deficiency Letter**"), in which the Company advised Dr. Nalluri of certain procedural defects in the November 24 Proposal, pursuant to Rule 14-a(8)(f). Exhibit D hereto is a copy of the Federal Express proof of delivery of the Procedural Deficiency Letter on November 30, 2017 and a copy of the Facsimile confirmation page confirming receipt of the facsimile copy of the letter on November 29, 2017. In the Procedural Deficiency Letter, the Company provided Dr. Nalluri with notice of procedural and eligibility deficiencies that the Company might use for the basis of excluding the November 28 Proposal and that the Company was interpreting the November 24 Proposal as a revised proposal, in accordance with Rule 14a-8 and Staff Legal Bulletin No. 14F (Oct. 18, 2011) ("**SLB 14F**"). To the extent that the November 24 Proposal did not replace the Initial Proposal, the letter also advised Dr. Nalluri of the procedural defects with respect to those proposals.

On December 8, 2017, the Company received the facsimile attached hereto as Exhibit E, including a letter with a revised proposal for the nomination of the Proponent as a nominee for Class A Director (the "**Proposal**"), together with a copy of the form of an Amendment 29 to the Proponent's Schedule 13D ("**Amendment 29**"), which includes, as additional text after the General Instructions, the text of the Proposal as received and additional statements. The Company received a hard copy of the Proposal and Amendment 29 by Federal Express on December 11, 2017. The Company has not received any subsequent correspondence from the Proponent. Since the Proposal was received within 14 days following the Proponent's receipt of the Procedural Deficiency Letter, the Company regards the Proposal as the sole and definitive proposal by the Proponent, replacing the November 24 Proposal.

We hereby respectfully request that the staff of the Division of Corporation Finance (the "**Staff**") confirm that it will not recommend any enforcement action to the Commission, if, in reliance on certain provisions of Commission Rule ("**Rule**") 14a-8 under the Securities Exchange Act of 1934, as amended (the "**Exchange Act**"), Avalon excludes the Initial Proposal, the November 24 Proposal and the Proposal from the 2018 Proxy Materials.

Avalon's 2018 Annual Meeting of Shareholders is tentatively scheduled for April 26, 2018. Avalon currently intends to file its definitive 2018 Proxy Statement with the Commission on or about March 16, 2018. Accordingly, this filing is timely made in accordance with the requirements of Rule 14a-8(j) under the Exchange Act. This letter is being submitted electronically pursuant to Question C of Staff Legal Bulletin No. 14D (Nov. 7, 2009) and as such, we are not enclosing the additional six copies ordinarily required by Rule 14a-8(j). A copy of this letter, including the exhibits, is being sent by facsimile and Federal Express on this date to the Proponent in accordance with Rule 14a-8(j), informing the Proponent of the Company's intention to omit the Proposal from the 2018 Proxy Materials.

SUMMARY OF PROPOSAL

The Proposal relates to the nomination of Dr. Anil C. Nalluri as a Class A Director for the Board of Directors of Avalon.

BASES FOR EXCLUSION

The Proponent's Proposal Concerns a Matter Relating to the Election of Membership on the Company's Board of Directors and therefore may be Excluded under Rule 14a-8(i)(8)(iv).

The text of the Proposal is "Election of Class A Director Anil Choudary Nalluri, M.D. ABPN." The Proposal may be properly omitted from the 2018 Proxy Materials because the Proposal relates to an election of the Company's 2018 board of directors (the "Board"). Under the proxy rules, a company is not required to include a shareholder's proposal that nominates himself to that company's board of directors.

Rule 14a-8(i)(8)(iv) permits a company to exclude a shareholder proposal from its proxy materials if the proposal "Seeks to include a specific individual in the company's proxy materials for election to the board of directors." When a shareholder's proposal clearly relates to the nomination of specific individuals for election to a company's board of directors, including the proponent himself or herself, the Staff has consistently indicated that the proposal may be excluded pursuant to Rule 14a-8(i)(8)(iv). See, First Trust Dividend and Income Fund, SEC No-Action Letter (January 30, 2014) (permitting exclusion of a shareholder proposal under Rule 14a-8(i)(8)(iv) where the shareholder nominated himself as a candidate for the upcoming proxy vote); Vicon Industries, Inc., SEC No-Action Letter (February 14, 2012) (permitting exclusion of a shareholder proposal under Rule 14a-8(i)(8)(iv) where the shareholder nominated himself as a candidate for the upcoming proxy vote).

The Proposal falls squarely within Rule 14a-8(i)(8)(iv), because the Proposal requests the Company to include a specific individual in the 2018 Proxy Materials for election to the board of directors. Such a proposal is specifically permitted to be excluded pursuant to Rule 14a-8(i)(8)(iv).

The Supporting Statement for Proponent's Proposal Contains False or Misleading Statements of Material Fact and therefore may be Excluded under Rule 14a-8(i)(3) and Rule 14a-9.

Rule 14a-8(i)(3) expressly states that a proposal or supporting statement may be excluded if contrary to Rule 14a-9, which prohibits materially false or misleading statements in proxy soliciting materials. The Company believes that it may properly omit the Proposal from the proxy materials under Rule 14a-8(i)(3) because it contains false and/or misleading statements of material fact: including a false statement of material fact related to the Proponent's percentage

ownership of shares and a mischaracterizations of financial figures which are purportedly based on the Company's public filings but in reality are inconsistent with the Company's current, publicly filed financial statements.

We note that the Proposal includes the following assertion in the proposed supporting statement which, when compared to the Company's current public filings, is demonstrably false: "Anil Choudary Nalluri should be elected as a Class A Director because along with his family, they own over 888,410 shares which is a majority of Class A Shares." As reported on the Company's most recent Report on Form 10-Q, filed November 11, 2017, the Company had 3,191,100 shares of Class A Common Stock outstanding at November 3, 2017 and there has been no change in the number of outstanding shares of its Class A Common Stock since such date. The Company has no method to determine whether the statement that Dr. Nalluri and his family "own over 888,410 shares" is factual. However, assuming that the number of shares owned by Dr. Nalluri and his family is correct, that number of shares does not represent a majority of the shares of Class A Stock (it actually represents approximately 27.8% of the outstanding shares of Class A Common Stock). This is a false statement of a material fact.

In addition, the proposed supporting statement refers to "publicly filed documents on September 30, 2017," and provides information which the reader would be led to believe is from publicly filed documents of the Company. The numbers in the proposed supporting statement are apparently loosely based on the Company's Quarterly Report on Form 10-Q for the Quarter Ended September 30, 2017 (which was filed on November 3, 2017). These numbers do not match the numbers actually reported. For example, the proposed Supporting Statement includes the following: "Net operating income also decreased from \$300,000 in the first nine months of 2016 to a net operating loss of \$300,000 in the first nine months of 2017." The Condensed Consolidated Statements of Operations provided in the Company's Report on Form 10-Q do not include any results under a line item "Net operating income." For the nine months ended September 30, 2016 and 2017, respectively, the Company reported [Dollars in thousands] "Operating income (loss)" of \$209 and \$(267), and "Net income (loss) attributable to Avalon Holdings Corporation common shareholders" of \$319 and \$(258). The Company believes that the Company's financial statements speak for themselves and that the use by the Proponent of terms not in the financial statements, and numbers which are not consistent with the financial statements, outside of the context financial statements themselves, is potentially misleading.

The Staff has identified situations in which exclusion in reliance on 14a-8(i)(3) is consistent with the Commission's intended application of Rule 14a-8(i)(3). See Staff Legal Bulletin No. 14B (September 15, 2004) ("**SLB 14B**"). One of those situations explicitly outlined in SLB 14B is where "the company demonstrates objectively that a factual statement is materially false or misleading." Surely, numerical statements which are demonstrably false and/or misleading when compared to a company's current, public filings fit into this category and should therefore be excluded. The statements made in the Proposal are not based on opinions or facts that are open to interpretation or counter argument. This seems quite unlike situations where companies have had difficulty objectively demonstrating that statements are materially false or misleading. See, Mylan, Inc., SEC No-Action Letter (March 4, 2015) (failing to concur with exclusion of a shareholder proposal under Rule 14a-8(i)(3) where the company

could not objectively demonstrate that portions of the supporting statement referring to the role and use of a pharmaceutical sold by the company in lethal injections were materially false or misleading); Dunkin' Brands Group, Inc., SEC No-Action Letter (February 28, 2017) (failing to concur with exclusion of a shareholder proposal under Rule 14a-8(i)(3) which stated that "a large part of revenue was derived from the sale of [a company product]" when it accounted for less than 6.4% of the company's total revenues). Instead, the Proposal makes false and misleading statements based on objective numerical facts which are easily verified in the Company's current public filings. See, Ferro Corp., SEC No-Action Letter (March 17, 2015) (permitting exclusion under Rule 14a-8(i)(3) where the proposal contained false statements of Ohio and Delaware law); State Street Corporation, SEC No-Action Letter (March 1, 2005) (permitting exclusion under Rule 14a-8(i)(3) where the proposal was based on provisions of state law that were not applicable to the company).

Because of the demonstrable false statement of a material fact as to majority ownership of Class A Common Stock of the Company and misleading characterizations or misstatements of material facts regarding financial statements of the Company, the Company believes that Proposal may also be excluded pursuant to Rule 14a-8(i)(3) as a violation of the proxy rules, specifically Rule 14a-9.

The Proponent has failed to provide proof of ownership of shares as required by Rule 14a-8(b)(ii), and Failed to Remedy the Deficiency after Timely Notice from the Company and therefore the Proponent's Proposal may be excluded pursuant to Rule 14a-8(f)(1).

We also point out that the Proponent has failed to address the deficiencies in the Proponent's proof of ownership which were described in the Procedural Deficiency Letter provided to the Proponent. In the Initial Proposal (included as Exhibit A hereto), the Proponent included as attachments copies of letters from E*TRADE Financial Corporation, each dated May 2, 2017, with respect to ownership of shares in three accounts. One account was in the name Dr. Nalluri and identified as a Roth IRA Account, one account was a joint account in the names of Dr. Nalluri and Parvati Nalluri and one account was in the name of Parvati Nalluri and identified as a Roth IRA account. As pointed out in the Procedural Deficiency Letter, none of these letters addresses whether the Proponent owned any securities as of the date of the Initial Proposal, or at any time before or after the date of the letters. The Proposal received December 8, 2017 did not include updated letters from E*TRADE Financial Corporation, only copies of the same letters dated May 2, 2017. Therefore the letters are not sufficient to prove ownership pursuant to Rule 14a-8(b)(2)(i).

As pointed out in the Procedural Deficiency Letter, as a filer of Schedule 13D, the Proponent would also be permitted to prove his ownership pursuant to Rule 14a-8(b)(2)(ii), by "providing to the Company a copy of a Schedule 13D, or an amendment thereto, filed by the shareholder with the SEC, reflecting ownership of the required securities as of or before the date on which the one year eligibility period began (one year prior to November 20, 2017). In order to comply with in Rule 14a-8(b)(2)(ii) you must provide a copy of such a Schedule 13D or amendment prior to the eligibility period, together with any subsequent amendment(s) reporting a change in your ownership levels." In connection with the November 24 Proposal, the

Proponent provided a copy of a Schedule 13D Amendment dated as of November 24, 2017 and in connection with the Proposal, the Proponent provided a copy of a Schedule 13D Amendment dated as of December 8, 2017. The proponent has not provided the Company copies of a Schedule 13D or any Amendments thereto for any date prior to November 20, 2017, and therefore has failed to provide proof of ownership in accordance with Rule 14a-8(b)(2)(ii)(A).

In addition to providing copies of the Schedule 13D, a Schedule 13D Filer is required, pursuant to Rule 14a-8(b)(2)(ii)(B), to provide a "written statement that [he] continuously held the required number of shares for the one-year period" as of the proposal date. The letters contained in the initial proposal contained the following statement: "I have included with this submission a letter from E*Trade Securities Corporation verifying that I own more than 20,000 shares as of the date of submission and that I have continuously held the shares for the last 17 years." As pointed out above, the letters from E*TRADE Financial Corporation do not speak to ownership as of the date of submission or as of any prior date. In the quoted sentence, the Proponent does not say that he has owned the shares for the required one year period (as required by Rule 14a-8(b)(2)(ii)(B)), rather he merely refers to enclosed letters which do not verify his ownership in accordance with Rule 14a-8(b)(2)(i). In Amendment 29, the text inserted after the General Instructions, includes the following: "I currently own 719,234 shares of Common A stock of Avalon Holdings Corporation, which presently has a market value of \$1,438,468 at the market price of \$2.00 now." Even assuming that this could be regarded as satisfying requirement of Rule 14a-8(b)(2)(ii)(B) that the Proponent provide a written statement to the Company, the statement is deficient in that it does not include a statement that the Proponent held the shares on November 20, 2017 or continuously for the one year period prior to such date. The Procedural Deficiency Letter specifically pointed out: "In addition, under 14a-8(b)(2)(ii) you are required to submit a written statement that you have continuously owned the required securities for at least a year prior to the submission date."

The Staff has consistently indicated that a proposal may be excluded pursuant to Rule 14a-8(b) and (f)(1) where the proponent does not provide proof of ownership by one of the methods provided in Rule 14a-8(b) and fails to correct such failure within 14 following receipt of a timely deficiency notice. See Amaren Corporation, SEC No-Action Letter (January 12, 2017) (permitting exclusion of a shareholder proposal under Rule 14a-8(f) where the shareholder provided non-compliant broker letters); and McDonald's Corporation, SEC No-Action Letter (February 6, 2016) (permitting exclusion of a shareholder proposal under Rule 14a-8(f) where the shareholder provided non-compliant broker letters).

Because of the failure by Proponent to prove the requisite ownership of company stock in accordance with Rule 14a-8(b)(2)(i) or (ii), after timely notice of such failure in the Procedural Deficiency Letter, the Proposal may be excluded from the 2018 Proxy Materials.

CONCLUSION

On the basis of the foregoing and on behalf of the Company, we hereby request that the Staff concur with the Company's view that the Proposal may be properly excluded from the 2018 Proxy Materials and not recommend enforcement action to the Commission if the Company omits the Proposal.

The Company believes that the Initial Proposal was replaced by the November 24 Proposal in accordance with Rule 14a-8 and as interpreted by SLB 14F, because the November 24 Proposal dealt with substantially the same subject matter as the Initial Proposal. The Company also believes that the Proposal, which the Company believes was submitted in response to the Company's Procedural Deficiency Letter, and which addressed certain of the procedural deficiencies of the November 24 Proposal, replaced the November 24 Proposal for the same reason. As a result the Company believes that neither the Initial Proposal nor the November 24 Proposal are required to be considered for inclusion in the 2018 Proxy materials, and the Company proposes to exclude each of them as having been replaced by the Proposal and withdrawn by the Proponent. We hereby request that the Staff concur with the Company's view that the Initial Proposal and the November 24 Proposal have been replaced by the Proposal and may be properly excluded from the 2018 Proxy Materials and not recommend enforcement action to the Commission if the Company omits the Initial Proposal and the November 24 Proposal.

Because the Company believes that the Initial Proposal and the November 24 should be considered replaced and withdrawn, we have not addressed the procedural or substantive grounds for their exclusion from the 2018 Proxy Materials. If the Staff does not agree with the Company's position that the Initial Proposal and the November 24 Proposal have been replaced and withdrawn, we request on behalf of the Company a waiver of the 80 calendar day requirement of Rule 14a-8(j)(1) and the opportunity to advise the Staff of substantive and procedural grounds for the Company's intention to exclude these proposals from the 2018 Proxy Materials.

If the Staff has any questions or comments regarding this submission, or if additional information is required in support of the Company's position, please contact the undersigned at (330)464-4106.

Very truly yours,



James S. Hogg

cc: By FedEx and By Fax to 330-783-3238
Dr. Anil Choudary Nalluri
5500 Market Street, Suite 128
Youngstown, OH 44512

By Email to bsaksa@avalonholdings.com
Mr. Bryan Saksa
Chief Financial Officer and Treasurer
Avalon Holdings Corporation
One American Way, Warren, OH 44484-5555

EXHIBIT A**ANIL CHOUDARY NALLURI, M.D., A.B.P.N., INC.**

Child and Adult Psychiatry

Certified by The American Board of Psychiatry and Neurology

Certified by The American Board of Forensic Psychiatry, March, 2005 - December 31, 2015 - Recertified April 3, 2017- Expires - April 3, 2027

Certified by The American Board of Independent Medical Examiners

Distinguished Life Fellow of The American Psychiatric Association

Assistant Professor of Psychiatry
Northeastern Ohio Universities
College of Medicine
1979-2012

5500 Market Street, Suite 128
Youngstown, Ohio 44512
Phone: 330-783-1147
Fax: 330-783-3238

Member of Teaching Faculty
At St. Elizabeth Hospital
Medical Center
1979 - 2012

November 20, 2017

VIA FAX & US MAIL

Bryan Saksa, Secretary Avalon Holdings Co.
One American Way
Warren, OH 44484-5555
Fax (330) 856-8480

RE: SUBMISSION OF SHAREHOLDERS PROPOSAL FOR 2018 PROXY
STATEMENT

Dear Ladies & Gentlemen:

In accordance with Rule 14a-8 under the Securities Exchange Act of 1934, as amended, I hereby submit for presentation at the 2018 Annual Meeting of Shareholders (the "Meeting") of Avalon Holdings Corporation (the "Company") and inclusion in the proxy materials (i.e., the notice of meeting, proxy statement and proxy card) relating to the Meeting the following proposal and supporting statement:

Text of Shareholder Proposal:

Election of Class A Director Anil Choudary Nalluri, M.D. ABPN;
Enclosed is my resume

Supporting Statement:

"According to the publicly filed documents on December 31, 1998, the Company and cash equivalent of \$22,274,000, equal to approximately \$5.85 per share."

Mr. Klinge and the board of directors have not provided and lack visibility of providing a return justifying the use of \$130 million dollars and borrowing an approximate additional \$30 million dollars at 6 percent interest. Corporate board members to whom I have spoken have stringent rates of return requirements for the approval of cash and cash investments. Judging from the results of the investment of \$130 million dollars in golf club renovations and the hotel, this investment is wasted because the corporation has been losing money every year.

If you invest \$130 million dollars in the bank your return on that savings would amount to \$5 million dollars per year.

However instead of Avalon Holdings Corporation making \$5 million in interest per year, the shareholders are losing approximately \$8 million per year.

Allocation of capital by the company, the company's board of directors has been very disappointing. We believe it is essential that the board of directors focus its attention on maximizing shareholder value in order to preserve the diminished value that remains.

We believe this can be accomplished with the assistance of an investment bank retained by the company to solicit offers on behalf of the company for the purchase of the company's stock and/or assets. The highest cash offer would then be presented to the company's shareholders for their acceptance or rejection.

This proposal does not mandate the sale of the company but proposes a reasonable process to determine the true market value of the company and to give the shareholders the opportunity to determine the future course of the company. Strong support for this proposal would send a signal to the board of directors that shareholders are dissatisfied with its performance.

In my opinion the board of directors are rubberstamping Mr. Klinge's proposals. It seems to me like this is the blind leading the blind. Mr. Klinge is guarding the Avalon Holdings Corporation since its inception from 4-30-1998 to date for 17 years like a fox guarding a hen house.

We urge you to vote FOR this proposal.

The entire fire sale liquidation value of Avalon Holdings Corporation 3.8 million shares is only \$8 million dollars on the open stock market today. The stock is highly ill-liquid.

The outside Class A shareholders are losing money daily and the board of directors to include the CEO and the accountants are the only ones profiting from this venture.

The salaries and bonuses of any and all executive officers skyrocket, however, every year for doing such a terrible job. In my opinion you and your executive board do not deserve any bonuses, evidenced by the fact that in 17 years the stock value of Avalon Holdings has grossly plummeted from \$8 a share to \$2.00 trading range for the past 2-3 years. The book value of the stock price is \$10.19. How can you justify the stock being sold for 1/4-1/5 of the book value? I strongly recommend that all of your salaries must be frozen until you show profit and increase the shareholder value. How can you justify the losses year after year for over 17 years? You have lost more money in the golf for the past 16-17 years. You never lost money in the garbage business. You are making money in the garbage business and borrowing more money and you wasted \$130 million dollars in the golf related and hotel business.

The above is clear indication of your lack of due diligence, dereliction of fiduciary duty, and pure incompetence. In fact it is my opinion that you and the rest of the board should reevaluate your roles, which is why I am running for the Class A director because I could certainly do no worse and undoubtedly do a better job of investing the shareholders money.

None of you asked an independent agency to evaluate whether investing \$40 million dollars in the Avalon Hotel in a depressed, poor Mahoning and Trumbull counties was a lucrative endeavor. We are not in Florida, South Carolina, Las Vegas or anywhere in California where these types of luxury hotels are found.

For Proxy Card:

"1. Authorize and direct Board of Directors to retain an investment bank to solicit offers for the Company's stock or assets and to present highest cash offer to shareholders within 120 days.

FOR ☐ AGAINST ☐ ABSTAIN ☐

I currently own 719,234 shares of Common A stock of Avalon Holdings Corporation, which presently has a market value of \$1,438,468 at the market price of \$2.00 now.

I have included with this submission a letter from E-Trade Securities Corporation verifying that I own more than 20,000 shares as of the date of submission and that I have continuously held the shares for the past 17 years.

I intend to continue to hold these shares through the date of the Meeting. I either personally or through a representative also intends to attend the Meeting and present the proposal in this submission in accordance with Ohio law.

I am sending this submission via Priority US Mail and will retain proof of delivery and I will also fax a copy to 330-856-8480 which will be no later than November 27, 2017.

Anil C. Nalluri MD 11-20-2017e

Anil C. Nalluri, M.D.

Certified by American Board of Psychiatry and Neurology, June 1981, certificate no. 22542

Certified by the American Board of Forensic Psychiatry, 03/31/05, expired 12/31/15, certificate no. 1554 Re Certified April 3, 2017 Expires 04-03-2027 (one out of 2500 psychiatrists in the United States)

Certified by American Board of Independent Medical Examiners 10/06/98, expires 10/06/18, certificate no. 98-01228 (one out of 11 psychiatrists in the United States)

Lifetime Continuing Education Hours AMA Guides 4th, 5th, & 6th Editions and Forensic Psychiatry (over 2,000 hours)

Pennsylvania Independent Rating Evaluator for the Bureau of Workers' Compensation, August 2001-02/20/2013

Assistant Professor of Psychiatry, NEOMED 07/19/82-12/31/12

Fellow, American Academy of Disability Evaluating Physicians 11/15/97 - 12/31/03

Fellow, American Psychiatric Association 12/19/97-12/31/02

Distinguished Fellow, American Psychiatric Association 01/01/03-01/26/10

Distinguished Life Fellow, American Psychiatric Association 01/27/10

Ohio Medical License # 35-040637 issued 05/19/77, expires 04/01/20

Pennsylvania Medical License# MD-037040-L issued 02/14/77, expires 12/31/18

ACN

CC/ Securities & Exchange Commission
100 F Street N.E.
Washington, DC 20549

Anil Choudary Nalluri, M.D.
 5500 Market Street, Suite 128
 Youngstown, Ohio 44512
 Phone: (330)783-1147 Fax: (330) 783-3239
 E-Mail: anilnalluri@yahoo.com
 DOB: *** AGE: ***

11/17/2017

PREMEDICAL EDUCATION:

- P.U.C. Degree May 1965 Andhra Christian College, Guntur, Andhra Pradesh, India
(Affiliated with Andhra University, Waltair, India)

MEDICAL EDUCATION:

- M.B.B.S. (M.D.) October 1971 Guntur Medical College, Guntur, Andhra Pradesh, India
(Affiliated with Andhra University, Waltair, India)
- Passed Educational Council for Foreign Medical Graduates Examination on January 23, 1973*

POST-M.D. MEDICAL TRAINING:

- Rotating Internship December 20, 1971-
December 19, 1972 Government General Hospital, Guntur, Andhra Pradesh India
- Senior House Surgeon June 12, 1973-
(Equivalent to residency) December 10, 1973 Departments of Internal Medicine, Government General Hospital,
Guntur, Andhra Pradesh, India
- Senior House Officer February 20, 1974-
May 19, 1974 Departments of Internal Medicine and Psychiatry, Government General Hospital,
Guntur, Andhra Pradesh, India
- General Practitioner January 1973-
June 1974 Office Practice, Tenali, Andhra Pradesh, India
- Rotating Internship July 1, 1974-
July 1, 1975 St. Thomas Hospital
444 North Main St., Akron, OH 44310
- Inpatient Psychiatry Resident July 1, 1975-
(Post-graduate) June 30, 1978 Fallsview Psychiatric Hospital (Closed)
330 Broadway East, Cuyahoga Falls, OH

CURRENT AND PAST PROFESSIONAL EMPLOYMENT:

- Staff Psychiatrist July 1, 1978-
September 1, 1979 Woodside Receiving Hospital, Youngstown, OH
- Part-time Private Practice October 1, 1978-
(Child and adult psychiatry) September 1, 1979 5500 Market Street, Suite 128, Youngstown, OH
- Full-time Private Practice September 1, 1979-
(Child and adult psychiatry) Present 5500 Market Street, Suite 128, Youngstown, OH

ADMINISTRATIVE EXPERIENCE:

- Administrator 1979-
(Of Night and Weekend Coverage) 1981 Fallsview Psychiatric Hospital
Supervised 80 physicians at former state psychiatric facilities Fairhill Mental Health Center
- Educator 1978-
January 7, 2013 St. Elizabeth Hospital Medical Center, Youngstown, Ohio
Supervised and trained 230 medical students and residents

SPECIALTY BOARD CERTIFICATION:

- American Board of Psychiatry and Neurology June 1981 Certificate Number 22542
- American Board of Forensic Psychiatry March 31, 2005-
December 31, 2015 Certificate Number 1554 Expired Recertified April 3, 2017

CERTIFICATIONS:

- American Board of Independent Medical Examiners October 6, 1998-
October 6, 2018 Certificate Number 98-01228
(One of 15 psychiatrists in the United States)

ACADEMIC AFFILIATIONS:

- Assistant Professor of Psychiatry July 20, 1982-
December 31, 2012 Northeast Ohio Medical University, Rootstown, OH

HOSPITAL AFFILIATIONS:

- Courtesy Staff April 19, 1979-
October 23, 1979 Dept. of Psychiatry, St. Elizabeth Hospital Medical Center, Youngstown, OH
- Associate Staff October 24, 1979-
October 26, 1981 Dept. of Psychiatry, St. Elizabeth Hospital Medical Center
- Active Staff October 27, 1981-
May 7, 2002 Dept. of Psychiatry, St. Elizabeth Hospital Medical Center
- Senior Staff May 8, 2002-
January 7, 2013 Dept. of Psychiatry, St. Elizabeth Hospital Medical Center
- Courtesy Staff October 1978-
April 12, 1998 Western Reserve Care System (Youngstown Hospital Assoc.), Youngstown, OH

- Courtesy Staff December 1, 1979-December 31, 1989 Cafaro Memorial Hospital, Youngstown, OH
- 1 Courtesy Staff1 October 11, 2007-January 7, 2013 St. Elizabeth Boardman Health Center, Youngstown, OH
- 1 Courtesy Staff1 April 1, 2007-January 7, 2009200 January 8, 2002-September 20, 2003 St. Joseph Health Center, Warren, OH
- 1 Courtesy Staff November 30, 2007-May 31, 2008 Dept of Behavioral Medicine, Forum Health Western Reserve Care System

MEDICAL MEMBERSHIPS:

- 1 General Member1 April 1977-Present American Psychiatric Association
- Member April 1977-Present Ohio Psychiatric Association
- Member November 1996-November 1997 American Academy of Disability Evaluating Physicians
- 1 Fellow1 November 15, 1997-December 31, 2004 American Academy of Disability Evaluating Physicians
- Fellow December 19, 1997-December 31, 2002 American Psychiatric Association
- Distinguished Fellow January 1, 2003-January 26, 2010 American Psychiatric Association
- Member January 1, 2010-Present American Academy of Psychiatry and Law
- Lifetime Distinguished Fellow January 27, 2010 American Psychiatric Association

MEDICAL LICENSES:

- State of Ohio May 19, 1977 #35-04-0657-N
- 1 State of Pennsylvania1 February 14, 1977 #MD-037040-L

ACTIVITIES/ASSOCIATIONS:

- 1 Coordinator of Medical Students1 July 20, 1982-December 31, 1999 Northeast Ohio Medical University
- Acting Clerkship Director of Psychiatry October 15, 1990-March 31, 1991 St. Elizabeth Hospital Medical Center
- Assistant Director January 1, 1992-June 30, 1992 Department of Psychiatry at St. Elizabeth Hospital Medical Center
- Director1 November 1, 1992-October 8, 1995 Inpatient Psychiatric Unit of St. Elizabeth Hospital Medical Center
- 1 Acting Vice Chairman1 November 1992-October 8, 1995 Department of Psychiatry of St. Elizabeth Hospital Medical Center
- 1 Chief Deputy Coroner1 July 1, 1993-February 26, 1995 Mahoning County Coroner
- Disability Evaluators Panel April 17, 1997-April 25, 2011 Ohio Bureau of Workers' Compensation
Served on panel to perform Independent Medical Exams and third level dispute resolution for medical treatment issues
- Vice Chairman October 3, 1997-May 1, 2002 Department of Psychiatry and Behavioral Sciences (St. Elizabeth Hospital Medical Center)
- Independent Rating Evaluator August 2001-2011 Pennsylvania Bureau of Workers' Compensation
- Chief Clinical Officer For Examining Involuntary Patients December 26, 2003-December 31, 2012 Humility of Mary Health Partners

AREAS OF RESEARCH AND ACADEMIC INTEREST:

- 1 Psychiatric Education1
- 1 Psychiatric Interview Techniques
- Detecting V65.2 Malingering
- Diagnosis and Differential Diagnosis
- Forensic Psychiatric Evaluation

- **Psycho pharmacology and Affective Disorders**
- **DSM-III, DSM-III-R, DSM-IV, and DSM-IV-TR, DSM-V**

Presented numerous lectures in Youngstown, Kent, Cleveland, Columbus and grand rounds at hospital

E*TRADE
FINANCIAL

tel 1-800-ETRADE-1
www.etrade.com

May 2, 2017

Anil C. Nalluri

Re: E*TRADE Securities Account XXXX- ***

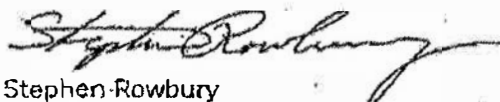
Dear Anil Nalluri,

This letter is in response to your request for verification of (AWX) shares held in E*TRADE Securities account XXXX- ***. We appreciate your time in making this request and we are happy to assist you.

Account number XXXX- *** is a Roth IRA brokerage account registered in the name of Anil C. Nalluri. This account was opened on January 13, 2010, and is currently in good standing. As of the time this letter was prepared on May 2, 2017, the account contained 846,316 Avalon Holdings Corporation, Class A (AWX) shares.

E*TRADE Securities LLC is committed to providing quality customer service. We hope that this information satisfies your request. Should you have any further questions, please feel free to contact a Financial Services Representative at 1-800-ETRADE-1, 24 hours a day, 7 days a week.

Sincerely,



Stephen Rowbury
Correspondence Department

PLEASE READ THE IMPORTANT DISCLOSURES BELOW.

The E*TRADE Financial family of companies provides financial services including trading, investing and banking products and services to retail customers.

Securities products and services are offered by E*TRADE Securities LLC, Member FINRA/SIPC.

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**E*TRADE
FINANCIAL**

E*TRADE Financial Corporation

PO Box 484

Jersey City, NJ 07303

tel 1-800-ETRADE-1
www.etrade.com

May 2, 2017

Anil Choudary Nalluri
Parvati Nalluri

Re: E*TRADE Securities Account XXXX- ***

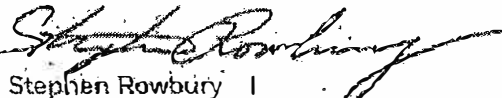
Dear Anil & Parvati Nalluri,

This letter is in response to your request for verification of Avalon Holdings Corporation, Class A (AWX) shares held in E*TRADE Securities account XXXX- ***. We appreciate your time in making this request and we are happy to assist you.

Account number XXXX- *** is a joint brokerage account registered in the names of Anil Choudary Nalluri and Parvati Nalluri. This account was opened on October 3, 1995, and is currently in good standing. As of the time this letter was prepared on May 2, 2017, the account contained 298,968 Avalon Holdings Corporation, Class A (AWX) shares.

E*TRADE Securities LLC is committed to providing quality customer service. We hope that this information satisfies your request. Should you have any further questions, please feel free to contact a Financial Services Representative at 1-800-ETRADE-1, 24 hours a day, 7 days a week.

Sincerely,

Stephen Rowbury
Correspondence Department**PLEASE READ THE IMPORTANT DISCLOSURES BELOW.**

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E*TRADE Financial Corporation
PO Box 484
Jersey City, NJ 07303

tel 1-800-ETRADE-1
www.etrade.com

May 2, 2017

Parvati Nalluri

Re: E*TRADE Securities Account XXXX- ***

Dear Parvati Nalluri,

This letter is in response to your request for verification of Avalon Holdings Corporation, Class A (AWX) shares held in E*TRADE Securities account XXXX- ***. We appreciate your time in making this request and we are happy to assist you.

Account number XXXX- *** is a Roth IRA brokerage account registered in the name of Parvati Nalluri. This account was opened on January 13, 2010, and is currently in good standing. As of the time this letter was prepared on May 2, 2017, the account contained 37,218 Avalon Holdings Corporation, Class A (AWX) shares.

E*TRADE Securities LLC is committed to providing quality customer service. We hope that this information satisfies your request. Should you have any further questions, please feel free to contact a Financial Services Representative at 1-800-ETRADE-1, 24 hours a day, 7 days a week.

Sincerely,



Stephen Rowbury
Correspondence Department

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**E*TRADE
FINANCIAL**

tel 1-800-ETRADE-1
www.etrade.com

May 2, 2017

Anil Choudary Nalluri

Re: E*TRADE Securities Account XXXX- ***

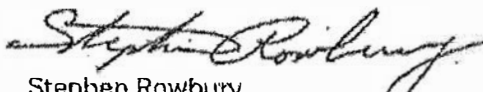
Dear Anil Nalluri,

This letter is in response to your request for verification of Avalon Holdings Corporation, Class A (AWX) shares held in E*TRADE Securities account XXXX- ***. We appreciate your time in making this request and we are happy to assist you.

Account number XXXX- *** is a Profit Sharing Plan brokerage account registered in the name of the Anil Choudary Nalluri MD P/S Plan. This account was opened on April 19, 2016, and is currently in good standing. As of the time this letter was prepared on May 2, 2017, the account contained 36,732 Avalon Holdings Corporation, Class A (AWX) shares.

E*TRADE Securities LLC is committed to providing quality customer service. We hope that this information satisfies your request. Should you have any further questions, please feel free to contact a Financial Services Representative at 1-800-ETRADE-1, 24 hours a day, 7 days a week.

Sincerely,


Stephen Rowbury
Correspondence Department

PLEASE READ THE IMPORTANT DISCLOSURES BELOW.

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Securities products and services are offered by E*TRADE Securities LLC, Member FINRA/SIPC.

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ANIL CHOUDARY NALLURI, M.D., A.B.P.N., INC.

Child and Adult Psychiatry

Certified by The American Board of Psychiatry and Neurology

Certified by The American Board of Forensic Psychiatry, March, 2005 - December 31, 2015 - Recertified April 3, 2017- Expires - April 3, 2027

Certified by The American Board of Independent Medical Examiners

Distinguished Life Fellow of The American Psychiatric Association

Assistant Professor of Psychiatry
Northeastern Ohio Universities
College of Medicine
1979-2012

5500 Market Street, Suite 128
Youngstown, Ohio 44512
Phone: 330-783-1147
Fax: 330-783-3238

Member of Teaching Faculty
At St. Elizabeth Hospital
Medical Center
1979 - 2012

November 20, 2017

VIA FAX & US MAIL

Bryan Saksa, Secretary Avalon Holdings Co.
One American Way
Warren, OH 44484-5555
Fax (330) 856-8480

RE: SUBMISSION OF SHAREHOLDERS PROPOSAL FOR 2018 PROXY
STATEMENT

Dear Ladies & Gentlemen:

In accordance with Rule 14a-8 under the Securities Exchange Act of 1934, as amended, I hereby submit for presentation at the 2018 Annual Meeting of Shareholders (the "Meeting") of Avalon Holdings Corporation (the "Company") and inclusion in the proxy materials (i.e., the notice of meeting, proxy statement and proxy card) relating to the Meeting the following proposal and supporting statement:

Text of Shareholder Proposal:

"RESOLVED: That the shareholders of Avalon Holdings Corporation (the "Company") authorize and direct the Company's Board of Directors to retain an investment bank to solicit offers for the purchase of the Company's stock or assets, and that the Board of Directors, within 120 days from the date of the approval of this resolution is directed to present the highest cash offer to purchase the Company's stock or assets to the shareholders for their acceptance or rejection of such offer."

Supporting Statement:

"According to the publicly filed documents on December 31, 1998, the Company and cash equivalent of \$22,274,000, equal to approximately \$5.85 per share."

Mr. Klinge and the board of directors have not provided and lack visibility of providing a return justifying the use of \$130 million dollars and borrowing an approximate additional \$30 million dollars at 6 percent interest. Corporate board members to whom I have spoken have stringent rates of return requirements for the approval of cash and cash investments. Judging from the results of the investment of \$130 million dollars in golf club renovations and the hotel, this investment is wasted because the corporation has been losing money every year.

If you invest \$130 million dollars in the bank your interest on that savings would amount to \$5 million dollars per year.

However instead of Avalon Holdings Corporation making \$5 million in interest per year, the shareholders are losing approximately \$8 million per year.

Allocation of capital by the company, the company's board of directors has been very disappointing. We believe it is essential that the board of directors focus its attention on maximizing shareholder value in order to preserve the diminished value that remains.

We believe this can be accomplished with the assistance of an investment bank retained by the company to solicit offers on behalf of the company for the purchase of the company's stock and/or assets. The highest cash offer would then be presented to the company's shareholders for their acceptance or rejection.

This proposal does not mandate the sale of the company but proposes a reasonable process to determine the true market value of the company and to give the shareholders the opportunity to determine the future course of the company. Strong support for this proposal would send a signal to the board of directors that shareholders are dissatisfied with its performance.

In my opinion the board of directors is rubberstamping Mr. Klinge's proposals. It seems to me like this is the blind leading the blind. Mr. Klinge is guarding the Avalon Holdings Corporation since its inception from 4-30-1998 to date for 17 years like a fox guarding a hen house.

We urge you to vote FOR this proposal.

The entire fire sale liquidation value of Avalon Holdings Corporation 3.8 million shares is only \$8 million dollars on the open stock market today. The stock is highly ill-liquid.

The outside Class A shareholders are losing money daily and the board of directors to include the CEO and the accountants are the only ones profiting from this venture.

The salaries and bonuses of any and all executive officers skyrocket, however, every year for doing such a terrible job. In my opinion you and your executive board do not deserve any bonuses, evidenced by the fact that in 17 years the stock value of Avalon Holdings has grossly plummeted from \$8 a share to \$1.90 trading range for the past 2-3 years. The book value of the stock price is \$10.19. How can you justify the stock being sold for 1/4-1/5 of the book value? I strongly recommend that all of your salaries must be frozen until you show profit and increase the shareholder value.

How can you justify the losses year after year for over 17 years? You have lost more money in the golf for the past 16-17 years. You never lost money in the garbage business. You are making money in the garbage business and borrowing more money and you wasted \$130 million dollars in the golf related and hotel business.

The above is clear indication of your lack of due diligence, dereliction of fiduciary duty, and pure incompetence. In fact it is my opinion that you and the rest of the board should reevaluate your roles, which is why I am running for the Class A director because I could certainly do no worse and undoubtedly do a better job of investing the shareholders money.

None of you asked an independent agency to evaluate whether investing \$40 million dollars in the Avalon Hotel in a depressed, poor Mahoning and Trumbull counties was a lucrative endeavor. We are not in Florida, South Carolina, Las Vegas or anywhere in California where these types of luxury hotels are found.

For Proxy Card:

"1. Authorize and direct Board of Directors to retain an investment bank to solicit offers for the Company's stock or assets and to present highest cash offer to shareholders within 120 days.

FOR []

AGAINST []

ABSTAIN []

I currently own 719234 shares of Common A stock of Avalon Holdings Corporation, which presently has a market value of \$1,438,468 at the market price of \$2.00 now.

I have included with this submission a letter from E-Trade Securities Corporation verifying that I own more than 20,000 shares as of the date of submission and that I have continuously held the shares for the past 17 years.

I intend to continue to hold these shares through the date of the Meeting. I either personally or through a representative also intends to attend the Meeting and present the proposal in this submission in accordance with Ohio law.

I am sending this submission via Priority US Mail and will retain proof of delivery and I will also fax a copy to 330-856-8480 which will be no later than November 27, 2017.

Anil C. Nalluri MD 11-20-2017

Anil C. Nalluri, M.D.

Certified by American Board of Psychiatry and Neurology, June 1981, certificate no. 22542

Certified by the American Board of Forensic Psychiatry, 03/31/05, expired 12/31/15, certificate no. 1554 Recertified 04-03-2017

Expires 04-03-2027. (one out of 2500 psychiatrists in the United States)

Certified by American Board of Independent Medical Examiners 10/06/98, expires 10/06/18, certificate no. 98-01228 (one out of 11 psychiatrists in the United States)

Lifetime Continuing Education Hours AMA Guides 4th, 5th, & 6th Editions and Forensic Psychiatry (over 2,000 hours)

Pennsylvania Independent Rating Evaluator for the Bureau of Workers' Compensation, August 2001-02/20/2013

Assistant Professor of Psychiatry, NEOMED 07/19/82-12/31/12

Fellow, American Academy of Disability Evaluating Physicians 11/15/97 - 12/31/03

Fellow, American Psychiatric Association 12/19/97-12/31/02

Distinguished Fellow, American Psychiatric Association 01/01/03-01/26/10

Distinguished Life Fellow, American Psychiatric Association 01/27/10

Ohio Medical License # 35-040657 issued 05/19/77, expires 04/01/20

Pennsylvania Medical License# MD-037040-L issued 02/14/77, expires 12/31/18

ACN/dj

CC/ Securities & Exchange Commission

100 F Street N.E.

Washington, DC 20549

UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
Washington, D.C. 20549

OMB APPROVAL	
OMB Number:	3235-0145
Expires:	February 28,
2009 Estimated average burden hours per response:	14.5

EXHIBIT B

SCHEDULE 13D

Under the Securities Exchange Act of 1934
(Amendment (28)*)

AVALON HOLDINGS CORPORATION

(Name of Issuer)

Class A Common Stock, \$0.01 par value

(Title of Class of Securities)

0534P109

(CUSIP Number)

Anil Choudary Nalluri 5500 Market Street, Suite 128 Youngstown, Ohio 44512 330-783-1147

(Name, Address and Telephone Number of Person Authorized to
Receive Notices and Communications)

November 24, 2017

(Date of Event which Requires Filing of this Statement)

If the filing person has previously filed a statement on Schedule 13G to report the acquisition that is the subject of this Schedule 13D, and is filing this schedule because of §§240.13d-1(e), 240.13d-1(f) or 240.13d-1(g), check the following box. ☐

Note: Schedules filed in paper format shall include a signed original and five copies of the schedule, including all exhibits. See §240.13d-7 for other parties to whom copies are to be sent.

*The remainder of this cover page shall be filled out for a reporting person's initial filing on this form with respect to the subject class of securities, and for any subsequent amendment containing information which would alter disclosures provided in a prior cover page.

The information required on the remainder of this cover page shall not be deemed to be "filed" for the purpose of Section 18 of the Securities Exchange Act of 1934 ("Act") or otherwise subject to the liabilities of that section of the Act but shall be subject to all other provisions of the Act (however, see the Notes).

Persons who respond to the collection of information contained in this form are not required to respond unless the form displays a currently valid OMB control number.

13D

1..	Names of Reporting Persons. I.R.S. Identification Nos. of above persons (entities only).
	Anil Choudary Nalluri
2..	Check the Appropriate Box if a Member of a Group (See Instructions).
(a).	
(b).	
3.	SEC Use Only
4.	Source of Funds (See Instructions) PF
5.	Check if Disclosure of Legal Proceedings Is Required Pursuant to Items 2(d) or 2(e) 6.
	Citizenship or Place of Organization United States
Number of Shares Bene- ficially by Owned by Each Reporting Person With	7. Sole Voting Power 719,234
	8. Shared Voting Power 0
	9. Sole Dispositive Power 719,234
	10. Shared Dispositive Power 0
1	Aggregate Amount Beneficially Owned by Each Reporting Person 719,234
2	Check if the Aggregate Amount in Row (11) Excludes Certain Shares (See Instructions)
13.	Percent of Class Represented by Amount in Row (11) 22.53%
14.	Type of Reporting Person (See Instructions) IN

Instructions for Cover Page

- (1) **Names and I.R.S. Identification Numbers of Reporting Persons** — Furnish the full legal name of each person for whom the report is filed - i.e., each person required to sign the schedule itself - including each member of a group. Do not include the name of a person required to be identified in the report but who is not a reporting person. Reporting persons that are entities are also requested to furnish their I.R.S. identification numbers, although disclosure of such numbers is voluntary, not mandatory (see "SPECIAL INSTRUCTIONS FOR COMPLYING WITH SCHEDULE 13D" below).
- (2) If any of the shares beneficially owned by a reporting person are held as a member of a group and the membership is expressly affirmed, please check row 2(a). If the reporting person disclaims membership in a group or describes a relationship with other persons but does not affirm the existence of a group, please check row 2(b) [unless it is a joint filing pursuant to Rule 13d-1(k)(1) in which case it may not be necessary to check row 2(b)].
- (3) The 3rd row is for SEC internal use; please leave blank.

- (4) Classify the source of funds or other consideration used or to be used in making purchases as required to be disclosed pursuant to Item 3 of Schedule 13D and insert the appropriate symbol (or symbols if more than one is necessary) in row (4):

Category of Source	Symbol
Subject Company (Company whose securities are being acquired)	SC
Bank	BK
Affiliate (of reporting person)	AF
Working Capital (of reporting person)	WC
Personal Funds (of reporting person)	PF
Other	OO

- (5) If disclosure of legal proceedings or actions is required pursuant to either Items 2(d) or 2(e) of Schedule 13D, row 5 should be checked.
- (6) *Citizenship or Place of Organization* - Furnish citizenship if the named reporting person is a natural person. Otherwise, furnish place of organization. (See Item 2 of Schedule 13D.)
- (7)-(11), (13) *Aggregate Amount Beneficially Owned by Each Reporting Person, etc.* — Rows (7) through (11) inclusive, and (13) are to be completed in accordance with the provisions of Item 5 of Schedule 13D. All percentages are to be rounded off to nearest tenth (one place after decimal point).
- (12) Check if the aggregate amount reported as beneficially owned in row (11) does not include shares which the reporting person discloses in the report but as to which beneficial ownership is disclaimed pursuant to Rule 13d-4 [17 CFR 240.13d-4] under the Securities Exchange Act of 1934.
- (14) *Type of Reporting Person* — Please classify each "reporting person" according to the following breakdown and place the appropriate symbol (or symbols, i.e., if more than one is applicable, insert all applicable symbols) on the form:

Category	Symbol
Broker-Dealer	BD
Bank	BK
Insurance Company	IC
Investment Company	IV
Investment Adviser	IA
Employee Benefit Plan or Endowment Fund	EP
Parent Holding Company/Control Person	HC
Savings Association	SA
Church Plan	CP
Corporation	COe
Partnership	PNe
Individual	INe
Other	OO

Notes:

Attach as many copies of the second part of the cover page as are needed, one reporting person per page.

Filing persons may, in order to avoid unnecessary duplication, answer items on the schedules (Schedule 13D, 13G or 14D-1) by appropriate cross references to an item or items on the cover page(s). This approach may only be used where the cover page item or items provide all the disclosure required by the schedule item. Moreover, such a use of a cover page item will result in the item becoming a part of the schedule and accordingly being considered as "filed" for purposes of Section 18 of the Securities Exchange Act or otherwise subject to the liabilities of that section of the Act.

Reporting persons may comply with their cover page filing requirements by filing either completed copies of the blank forms available from the Commission, printed or typed facsimiles, or computer printed facsimiles, provided

the documents filed have identical formats to the forms prescribed in the Commission's regulations and meet existing Securities Exchange Act rules as to such matters as clarity and size (Securities Exchange Act Rule 12b-12).

SPECIAL INSTRUCTIONS FOR COMPLYING WITH SCHEDULE 13D

Under Sections 13(d) and 23 of the Securities Exchange Act of 1934 and the rules and regulations thereunder, the Commission is authorized to solicit the information required to be supplied by this schedule by certain security holders of certain issuers.

Disclosure of the information specified in this schedule is mandatory, except for I.R.S. identification numbers, disclosure of which is voluntary. The information will be used for the primary purpose of determining and disclosing the holdings of certain beneficial owners of certain equity securities. This statement will be made a matter of public record. Therefore, any information given will be available for inspection by any member of the public.

Because of the public nature of the information, the Commission can utilize it for a variety of purposes, including referral to other governmental authorities or securities self-regulatory organizations for investigatory purposes or in connection with litigation involving the Federal securities laws or other civil, criminal or regulatory statutes or provisions. I.R.S. identification numbers, if furnished, will assist the Commission in identifying security holders and, therefore, in promptly processing statements of beneficial ownership of securities.

Failure to disclose the information requested by this schedule, except for I.R.S. identification numbers, may result in civil or criminal action against the persons involved for violation of the Federal securities laws and rules promulgated thereunder.

General Instructions

- A. The item numbers and captions of the items shall be included but the text of the items is to be omitted. The answer to the items shall be so prepared as to indicate clearly the coverage of the items without referring to the text of the items. Answer every item. If an item is inapplicable or the answer is in the negative, so state.
- B.e Information contained in exhibits to the statements may be incorporated by reference in answer or partial answer to any item or sub-item of the statement unless it would render such answer misleading, incomplete, unclear or confusing. Material incorporated by reference shall be clearly identified in the reference by page, paragraph, caption or otherwise. An express statement that the specified matter is incorporated by reference shall be made at the particular place in the statement where the information is required. A copy of any information or a copy of the pertinent pages of a document containing such information which is incorporated by reference shall be submitted with this statement as an exhibit and shall be deemed to be filed with the Commission for all purposes of the Act.
- C.e If the statement is filed by a general or limited partnership, syndicate, or other group, the information called for by Items 2-6, inclusive, shall be given with respect to (i) each partner of such general partnership; (ii) each partner who is denominated as a general partner or who functions as a general partner of such limited partnership; (iii) each member of such syndicate or group; and (iv) each person controlling such partner or member. If the statement is filed by a corporation or if a person referred to in (i), (ii), (iii) or (iv) of this instruction is a corporation, the information called for by the above mentioned items shall be given with respect to (a) each executive officer and director of such corporation; (b) each person controlling such corporation; and (c) each executive officer and director of any corporation or other person ultimately in control of such corporation.

Item 1. Security and Issuer

This Statement on Schedule 13D ("Schedule 13D") relates to the Class A Common Stock, \$0.01 par value (the "Common Stock") of Avalon Holdings Corporation, an Ohio corporation (the "Issuer"), whose principal executive offices are located at One American Way, Warren, Ohio 44484.

Item 2. Identity and Background

This statement is filed by Anil Choudary Nalluri ("Mr. Nalluri" or the "Reporting Person") on behalf of himself and his wife, Parvati Nalluri and various accounts controlled by them. Mr. Nalluri's principal business address is 5500 Market Street, Suite 128, Youngstown, Ohio 44512. Mr. Nalluri's principal occupation is practicing in the field of child and adult psychiatry. During the past five years, Mr. Nalluri has not been convicted in a criminal proceeding (excluding traffic violations).

or similar misdemeanors) and has not been a party to civil proceedings of a judicial or administrative body of competent jurisdiction, as a result of which Mr. Nalluri was or is subject to a judgment, decree, or final order enjoining future violations of, or prohibiting or mandating activities subject to, federal or state securities laws or finding any violation with respect to such laws. Mr. Nalluri is a United States citizen.

Item 3. Source and Amount of Funds or Other Consideration

Mr. Nalluri's purchases of shares of Common Stock have all been made with his personal funds.

Item 4. Purpose of Transaction

The purpose of this filing is to state that Mr. Nalluri is the beneficial owner of greater than 20% of the Common Stock of the issuer.

Mr. Nalluri does not currently have any specific plans or proposals that relate to or would result in any of the actions or events specified in clauses (a) through (j) of Item 4 of Schedule 13D. Mr. Nalluri reserves the right to change plans and take any and all actions that Mr. Nalluri may deem appropriate to maximize the value of his investments, including, among other things, purchasing or otherwise acquiring additional securities of the Issuer, selling or otherwise disposing of any securities of the Issuer beneficially owned by him, in each case in the open market or in privately negotiated transactions, or formulating other plans or proposals regarding the Issuer or its securities to the extent deemed advisable by Mr. Nalluri in light of his general investment policies, market conditions, subsequent developments affecting the Issuer and the general business and future prospects of the Issuer.

Item 5. Interest in Securities of the Issuer

- (a) Mr. Nalluri beneficially owns 719,234 shares of Common Stock, which is equal to approximately 22.53% of the outstanding shares, based on information from the Issuer that 3,191,100 Class A shares of Common Stock are outstanding as of March 3, 2017.
- (b) Mr. Nalluri has sole voting and dispositive power for all such shares of Common Stock held record by him.

Item 6. Contracts, Arrangements, Understandings or Relationships with Respect to Securities of the Issuer

Not applicable

Item 7. Material to be Filed as Exhibits

Not applicable

Item 8. Submission of Shareholders Proposals for 2018 Proxy Statement

In accordance with Rule 14a-8 under the Securities Exchange Act of 1934, as amended, I hereby submit for presentation at the 2018 Annual Meeting of Shareholders (the "Meeting") of Avalon Holdings Corporation (the "Company") and inclusion in the proxy materials (i.e., the notice of meeting, proxy statement and proxy card) relating to the Meeting the following proposal and supporting statement:

1. Election of Class A Director Anil Choudary Nalluri, M.D. ABPN:
Enclosed is my resume
2. "RESOLVED: That the shareholders of Avalon Holdings Corporation (the "Company") authorize and direct the Company's Board of Directors to retain an investment bank to solicit offers for the purchase of the Company's stock or assets, and that the Board of Directors, within 120 days from the date of the approval of this resolution is directed to present the highest cash

offer to purchase the Company's stock or assets to the shareholders for their acceptance or rejection of such offer."

Supporting Statement:

"According to the publicly filed documents on December 31, 1998, the Company and cash equivalent of \$22,274,000, equal to approximately \$5.85 per share."

Mr. Klinge and the board of directors have not provided and lack visibility of providing a return justifying the use of approximately \$100 million dollars and borrowing an approximately additional \$20 million dollars at 6 percent interest. Corporate board members to whom I have spoken have stringent rates of return requirements for the approval of cash and cash investments. Judging from the results of the investment of \$100-\$130 million dollars in golf club renovations and the hotel & taking huge salaries bonuses this investment is wasted because the corporation has been losing money almost every year except 1 or 2 years.

I am the one and only outside Class A Shareholder who has attended all meetings with exception of 1 or 2. Mr. Klinge has repeatedly touted that he is making intelligent decisions contrary to that, I would say Mr. Klinge is doing the opposite evidenced by the stock has plummeted from \$3 a share to \$2 per share since April 30, 1998 to present. This is a clear evidence of Mr. Klinge's incompetency to run the board. Not only Mr. Klinge but the entire board is incompetent. Mr. Klinge should be ashamed of himself and resign immediately. I also believe a new CEO should be hired. If Mr. Klinge could have made rational decisions like Amazon, Apple Computer, and Tesla Motors the stock should have sky rocketed from \$3 a share to a much greater value.

If you invest approximately \$100 million dollars in the bank your return on that savings would amount to approximately \$3 million dollars per year.

However instead of Avalon Holdings Corporation making \$3 million in interest per year, the shareholders are losing approximately \$5 - \$6 million per year.

Allocation of capital by the company, the company's board of directors has been very disappointing. We believe it is essential that the board of directors focus its attention on maximizing shareholder value in order to preserve the diminished value that remains.

We believe this can be accomplished with the assistance of an investment bank retained by the company to solicit offers on behalf of the company for the purchase of the company's stock and/or assets. The highest cash offer would then be presented to the company's shareholders for their acceptance or rejection.

This proposal does not mandate the sale of the company but proposes a reasonable process to determine the true market value of the company and to give the shareholders the opportunity to determine the future course of the company. Strong support for this proposal would send a signal to the board of directors that shareholders are dissatisfied with its performance.

In my opinion the board of directors are rubberstamping Mr. Klinge's proposals. It seems to me like this is the blind leading the blind. Mr. Klinge is guarding the Avalon Holdings Corporation since its inception from 4-30-1998 to date for 19 years like a fox guarding a hen house.

We urge you to vote FOR this proposal.

The entire sale of Avalon Holdings 3.8 million share of the open stock exchange is only worth 8 million dollars. The stock is highly ill-liquid.

The outside Class A shareholders are losing money daily and the board of directors to include the CEO and the accountants are the only ones profiting from this venture.

you and your executive board do not deserve any bonuses, evidenced by the fact that in 1 year the stock value of Avalon Holdings has grossly plummeted from \$3 a share to \$2.00 trading range for the past 2-3 years. The book value of the stock price is \$9.98. How can you justify the stock being sold for 1/4-1/5 of the book value? I strongly recommend that all of your salaries must be frozen until you show profit and increase the shareholder value.

How can you justify the losses year after year for over 19 years? You have lost more money in the golf for the past 19 years. You never lost money in the garbage business.

You are making money in the garbage business and borrowing more money and you wasted approximately \$100 - \$130 million dollars in the golf related and hotel business. I was unable to have access to the records to know the exact amount. The \$100 - \$130 millions that includes:

1. Buying and leasing Country Clubs

- 11/24/2017 FRI 10:38 [TX/RX NO 8161] ☒ 007

ANIL C. NALLURI MD 11-24-2017
Signature

Name/Title: Anil Choudary Nalluri

The original statement shall be signed by each person on whose behalf the statement is filed or his authorized representative. If the statement is signed on behalf of a person by his authorized representative (other than an executive officer or general partner of the filing person), evidence of the representative's authority to sign on behalf of such person shall be filed with the statement; provided, however, that a power of attorney for this purpose which is already on file with the Commission may be incorporated by reference. The name and any title of each person who signs the statement shall be typed or printed beneath his signature.

Attention: Intentional misstatements or omissions of fact constitute Federal criminal violations (See 18 U.S.C. 1001)



Avalon Holdings Corporation

EXHIBIT C

One American Way • Warren, OH 44484-5555 • Phone (330) 856-8800 • Fax (330) 856-8480

November 29, 2017

By FedEx and By Fax to 330-783-3238

Dr. Anil Choudary Nalluri
5500 Market Street, Suite 128
Youngstown, OH 44512

Re: Notice of Failure to Follow Eligibility and Procedural Requirements for Shareholder Proposals

Dear Dr. Nalluri,

This letter is sent to you in accordance with Rule 14a-8 under the Securities Exchange Act of 1934 in response to your two letters, dated November 20, 2017, which Avalon Holdings Corporation (the "Company") received by fax on November 20, 2017. In addition, the Company received from you, by fax on November 24, 2017, an analog copy of Amendment (28) to your Schedule 13D (the "13D Amendment"), filed with the Securities and Exchange Commission (the "SEC") electronically on November 24, 2017. The fax was received apparently prior to the filing with the SEC. The 13D Amendment contains, in "Item 8 **Submission of Shareholders Proposals for 2018 Proxy Statement**," a statement that "I hereby submit for presentation at the 2018 Annual Meeting of Shareholders (the "Meeting") of Avalon Holdings Corporation (the "Company") and inclusion in the proxy materials (i.e., the notice of meeting, proxy statement and proxy card) relating to the Meeting the following proposal and supporting statement: ..." Although there was no cover letter to provide the Company with guidance as to whether this was intended to be a submission of a shareholder proposal, or, if it was so intended, as to whether the submission was intended to be a separate shareholder proposal or a revised proposal, replacing the two proposals submitted on November 20th.

The Company believes that since the substance of the proposals in "Item 8" of the 13D Amendment is substantially identical to the language of proposals contained in the November 20th letters, with substantial revision to the Supporting Statement, it should treat the language in "Item 8" as a revised shareholder proposal submission by you. In accordance with Rule 14a-8 and SEC Staff Legal Bulletin 14F, the Company is required to accept the revisions contained in the revised proposal and to base any no action request for the exclusion of the proposal on the language of the revised proposal. For ease of reference in this letter, the Company will refer to language contained in "Item 8" of the 13D Amendment as the "Revised Proposal," the proposal contained in the first letter received on November 20th (pages 1-6 of the fax) as Proposal 1 and the proposal contained in the second letter November 20th (pages 11-13 of the fax) as Proposal 2. A copy of Rule 14a-8 is enclosed for your reference.

Pursuant to that rule the Company is required to notify you, within 14 days following its receipt of your shareholder proposals, of any failure to follow any of the eligibility or procedural requirements explained in Rule 14a-8(a)-(d). This letter is provided to notify you that the Revised Proposal does not meet the requirements in Rule 14a-8(a)-(d) for the following reasons:

- 1.r **Rule 14a-8(b).** You have not provided the proof of ownership to the Company required pursuant to Rule 14a-8(b). Rule 14a-8(b)(1) requires that the proposing shareholder hasr continuously held \$2,000 in market value, or 1%, of the Company's securities for at least oner year prior to submission of the proposal. Rule 14a-8(b)(2) states that if a shareholder is not ther registered holder of the shares, the shareholder "must" prove eligibility to the Company. Ruler 14a-8(b), as interpreted in SEC Staff Legal Bulletin 14F, requires that such ownership is proven asr of the date of the submission of the original proposal (November 20, 2017), not as of the date ofr the submission of the revised proposal. Rule 14a-8(b)(2)(i) permits the shareholder to prover such ownership by providing a written statement from a broker verifying that, at the time ther shareholder submitted the proposal, the shareholder held the required securities and that ther shareholder continuously held those securities for a period of at least one year. Your letters ofr November 20th attached copies of four letters from ETrade Financial dated May 2, 2017 withr respect to securities held in various accounts registered in various names. None of these lettersr states that you owned any Company securities "at the time you submitted your proposal" andr none of these letters makes any statement as to whether you owned any Company securitiesr continuously for a period of at least one year prior to such submission. Therefore, the lettersr submitted failed to prove ownership of Company securities as required by in Rule 14a-8(b)(2)(i).r In order for you to use broker letters to prove your ownership of Company securities, the brokerr letters must specify that the shares were held by you on the date the shareholder proposalsr were submitted (November 20, 2017) and were held continuously for a period of at least oner year prior to such date. In addition, Rule 14a-8(b)(2)(ii) permits a shareholder to prover ownership by providing a copy of a Schedule 13D, or an amendment thereto, filed by ther shareholder with the SEC, reflecting ownership of the required securities as of or before ther date on which the one year eligibility period began (one year prior to November 20, 2017). Inr order to comply with in Rule 14a-8(b)(2)(ii) you must provide a copy of such a Schedule 13D orr amendment prior to the eligibility period, together with any subsequent amendment(s)r reporting a change in your ownership levels. In addition, under 14a-8(b)(2)(ii) you are requiredr to submit a written statement that you have continuously owned the required securities for atr least a year prior to the submission date.r
- 2.r **Rule 14a-8(c).** Rule 14a-8(c) states that each shareholder may submit no more than oner proposal to a company for a particular meeting. The Revised Proposal includes 2 proposalsr (numbered 1 and 2 in the 13D Amendment): the first proposal is for your election as a Class Ar Director of the Company, and the second proposal directs the Board of Directors to retain anr investment bank to solicit offers for the Company and to present the highest cash offer tor shareholders within 120 days of the approval of the proposal. The proposed language forr inclusion in the proxy card similarly identifies two separately numbered items. The inclusion ofr two proposals in the Revised Proposal violates the procedural requirements of Rule 14a-8(c). Tor comply with Rule 14a-8(c), the number of proposals must be reduced so as not to exceed ther one proposal limit.r
- 3.r **Rule 14a-8(d).** Rule 14a-8(d) states that a proposal, including any accompanying supportingr statement, may not exceed 500 words. The Revised Proposal, which includes the supportingr statement, contains more than the 500 word limit, and, therefore, does not comply with ther procedural requirements of Rule 14a-8(d). To comply with Rule 14a-8(d), the number of wordsr in the Revised Proposal, including any accompanying supporting statement, must be reduced sor as not to exceed the 500 word limit.r

To the extent that you or the SEC staff might disagree that Revised Proposal represents a revised proposal under the Rule and SEC Legal Staff Bulletin, and that the Revised Proposal represents an additional shareholder proposal submitted by you, the Revised Proposal would represent an additional violation of Rule 14a-8(c), which prohibits submission of more than one proposal. In order to comply with that rule, the Revised Proposal, Proposal 1 and Proposal 2 would need to be revised so as not to exceed the one proposal limit.

If the Revised Proposal is considered an additional proposal, the Company also hereby provides you notice regarding the following eligibility and procedural deficiencies with respect to Proposal 1 and Proposal 2:

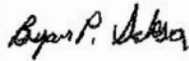
- 4.e **Rule 14a-8(b).** Paragraph 1 above discusses the requirements of Rule 14a-8(b) regarding the proof of eligibility. The same deficiencies exist with respect to Proposals 1 and 2, and the acceptable methods of proof pursuant to Rule 14a-8(b)(i) and (ii) are described in Paragraph 1e above.e
- 5.e **Rule 14a-8(c).** Rule 14a-8(c) states that each shareholder may submit no more than one proposal to a company for a particular meeting. Your two letters of November 20th present two separate proposals: Proposal 1 (for your election as a Class A director of the Company) and Proposal 2 which directs the Board of Directors to retain an investment bank to solicit offers for the Company and to present the highest cash offer to shareholders within 120 days of the approval of the proposal. Your submission of two separate proposals violates the procedural requirements of Rule 14a-8(c). In order to comply with that rule, Proposal 1 and Proposal 2e would need to be revised so as not to exceed the one proposal limit.e
- 6.e **Rule 14a-8(d).** Rule 14a-8(d) states that a proposal, including any accompanying supporting statement, may not exceed 500 words. Proposal 1 itself includes the cross-referenced, attached resume. You have not indicated by use of quotation marks, or otherwise, what text in the letter is intended to be included as the supporting statement for Proposal 1. We believe that your supporting statement begins with the words following "Supporting Statement..." and includes the remaining text of the letter, at least until the words "hotels are found," immediately preceding the Proxy Card language. This belief is, in part, based on the fact that the 13De Amendment, as filed with the SEC, includes, in the text of "Item 8," a statement which identifies "the following proposal [sic] and supporting statement:" followed by language similar to the entire text of the original letters relating to Proposals 1 and 2 received by the Company,e although the text filed with the Schedule 13D includes additional language. Proposal 1, which incorporates by reference the attached resume, and which includes the supporting statement,e contains more than the 500 word limit, and, therefore, does not comply with the procedural requirement of Rule 14a-8(d). To comply with Rule 14a-8(d), the number of words in Proposal 1, including any accompanying supporting statement, must be reduced so as not to exceed the 500 word limit. You have not indicated by use of quotation marks, or otherwise, what text in the letter relating to Proposal 2 is intended to be included as the supporting statement for Proposal 2. For the same reasons as stated above with respect to Proposal 1, we believe that your supporting statement begins with the words following "Supporting Statement..." and includes the remaining text of the letter, at least until the words "hotels are found,"e immediately preceding the Proxy Card language. Proposal 2, which includes the supporting statement, contains more than the 500 word limit, and, therefore, does not comply with the procedural requirement of Rule 14a-8(d). To comply with that rule, the number of words in

Proposal 2, including any accompanying supporting statement, must be reduced so as not to exceed the 500 word limit.

In accordance with Rule 14a-8, your response to this notice must be postmarked, or electronically submitted, not later than 14 days from the date you receive this notice. If the Company decides that it intends to exclude one or more of your proposals, it is required to provide a submission to the SEC, and to provide a copy of the submission to you.

Please note that this letter is being provided pursuant to, and as required by, Rule 14a-8. This letter should not be regarded in any way as acceptance by the Company of, or limiting the rights of the Company with respect to, the 13D Amendment filed with the SEC.

Very truly yours,

A handwritten signature in black ink, appearing to read "Bryan P. Saksa".

Bryan P. Saksa
Chief Financial Officer

Rule 14a-8 Shareholder proposals.

This section addresses when a company must include a shareholder's proposal in its proxy statement and identify the proposal in its form of proxy when the company holds an annual or special meeting of shareholders. In summary, in order to have your shareholder proposal included on a company's proxy card, and included along with any supporting statement in its proxy statement, you must be eligible and follow certain procedures. Under a few specific circumstances, the company is permitted to exclude your proposal, but only after submitting its reasons to the Commission. We structured this section in a question-and-answer format so that it is easier to understand. The references to "you" are to a shareholder seeking to submit the proposal.

(a) Question 1: What is a proposal?

A shareholder proposal is your recommendation or requirement that the company and/or its board of directors take action, which you intend to present at a meeting of the company's shareholders. Your proposal should state as clearly as possible the course of action that you believe the company should follow. If your proposal is placed on the company's proxy card, the company must also provide in the form of proxy means for shareholders to specify by boxes a choice between approval or disapproval, or abstention. Unless otherwise indicated, the word "proposal" as used in this section refers both to your proposal, and to your corresponding statement in support of your proposal (if any).

(b) Question 2: Who is eligible to submit a proposal, and how do I demonstrate to the company that I am eligible?

(1) In order to be eligible to submit a proposal, you must have continuously held at least \$2,000 in market value, or 1%, of the company's securities entitled to be voted on the proposal at the meeting for at least one year by the date you submit the proposal. You must continue to hold those securities through the date of the meeting.

(2) If you are the registered holder of your securities, which means that your name appears in the company's records as a shareholder, the company can verify your eligibility on its own, although you will still have to provide the company with a written statement that you intend to continue to hold the securities through the date of the meeting of shareholders. However, if like many shareholders you are not a registered holder, the company likely does not know that you are a shareholder, or how many shares you own. In this case, at the time you submit your proposal, you must prove your eligibility to the company in one of two ways:

(i) The first way is to submit to the company a written statement from the "record" holder of your securities (usually a broker or bank) verifying that, at the time you submitted your proposal, you continuously held the securities for at least one year. You must also include your own written statement that you intend to continue to hold the securities through the date of the meeting of shareholders; or

(ii) The second way to prove ownership applies only if you have filed a Schedule 13D (§ 240.13d-101), Schedule 13G (§ 240.13d-102), Form 3 (§ 249.103 of this chapter), Form 4 (§ 249.104 of this chapter) and/or Form 5 (§ 249.105 of this chapter), or amendments to those documents or updated forms, reflecting your ownership of the shares as of or before the date on which the one-year eligibility period begins. If you have filed one of these documents with the SEC, you may demonstrate your eligibility by submitting to the company:

(A) A copy of the schedule and/or form, and any subsequent amendments reporting a change in your ownership level;

(B) Your written statement that you continuously held the required number of shares for the one-year period as of the date of the statement; and

(C) Your written statement that you intend to continue ownership of the shares through the date of the company's annual or special meeting.

(c) Question 3: How many proposals may I submit?

Each shareholder may submit no more than one proposal to a company for a particular shareholders' meeting.

(d) Question 4: How long can my proposal be?

The proposal, including any accompanying supporting statement, may not exceed 500 words.

(e) Question 5: What is the deadline for submitting a proposal?

(1) If you are submitting your proposal for the company's annual meeting, you can in most cases find the deadline in last year's proxy statement. However, if the company did not hold an annual meeting last year, or has changed the date of its meeting for this year more than 30 days from last year's meeting, you can usually find the deadline in one of the company's quarterly reports on Form 10-Q (§ 249.308a of this chapter), or in shareholder reports of investment companies under § 270.30d-1 of this chapter of the Investment Company Act of 1940. In order to avoid controversy, shareholders should submit their proposals by means, including electronic means, that permit them to prove the date of delivery.

(2) The deadline is calculated in the following manner if the proposal is submitted for a regularly scheduled annual meeting. The proposal must be received at the company's principal executive offices not less than 120 calendar days before the date of the company's proxy statement released to shareholders in connection with the previous year's annual meeting. However, if the company did not hold an annual meeting the previous year, or if the date of this year's annual meeting has been changed by more than 30 days from the date of the previous year's meeting, then the deadline is a reasonable time before the company begins to print and send its proxy materials.

(3) If you are submitting your proposal for a meeting of shareholders other than a regularly scheduled annual meeting, the deadline is a reasonable time before the company begins to print and send its proxy materials.

(f) Question 6: What if I fail to follow one of the eligibility or procedural requirements explained in answers to Questions 1 through 4 of this section?

(1) The company may exclude your proposal, but only after it has notified you of the problem, and you have failed adequately to correct it. Within 14 calendar days of receiving your proposal, the company must notify you in writing of any procedural or eligibility deficiencies, as well as of the time frame for your response. Your response must be postmarked, or transmitted electronically, no later than 14 days from the date you received the company's notification. A company need not provide you such notice of a deficiency if the deficiency cannot be remedied, such as if you fail to submit a proposal by the company's properly determined deadline. If the company intends to exclude the proposal, it will later have to make a submission under § 240.14a-8 and provide you with a copy under Question 10 below, § 240.14a-8(j).

(2) If you fail in your promise to hold the required number of securities through the date of the meeting of shareholders, then the company will be permitted to exclude all of your proposals from its proxy materials for any meeting held in the following two calendar years.

(g) Question 7: Who has the burden of persuading the Commission or its staff that my proposal can be excluded?

Except as otherwise noted, the burden is on the company to demonstrate that it is entitled to exclude a proposal.

(h) Question 8: Must I appear personally at the shareholders' meeting to present the proposal?

(1) Either you, or your representative who is qualified under state law to present the proposal on your behalf, must attend the meeting to present the proposal. Whether you attend the meeting yourself or send a qualified representative to the meeting in your place, you should make sure that you, or your representative, follow the proper state law procedures for attending the meeting and/or presenting your proposal.

(2) If the company holds its shareholder meeting in whole or in part via electronic media, and the company permits you or your representative to present your proposal via such media, then you may appear through electronic media rather than traveling to the meeting to appear in person.

(3) If you or your qualified representative fail to appear and present the proposal, without good cause, the company will be permitted to exclude all of your proposals from its proxy materials for any meetings held in the following two calendar years.

(i) Question 9: If I have complied with the procedural requirements, on what other bases may a company rely to exclude my proposal?

(1) **Improper under state law:** If the proposal is not a proper subject for action by shareholders under the laws of the jurisdiction of the company's organization;

Note to paragraph (i)(1): Depending on the subject matter, some proposals are not considered proper under state law if they would be binding on the company if approved by shareholders. In our experience, most proposals that are cast as recommendations or requests that the board of directors take specified action are proper under state law. Accordingly, we will assume that a proposal drafted as a recommendation or suggestion is proper unless the company demonstrates otherwise.

(2) **Violation of law:** If the proposal would, if implemented, cause the company to violate any state, federal, or foreign law to which it is subject;

Note to paragraph (i)(2): We will not apply this basis for exclusion to permit exclusion of a proposal on grounds that it would violate foreign law if compliance with the foreign law would result in a violation of any state or federal law.

(3) **Violation of proxy rules:** If the proposal or supporting statement is contrary to any of the Commission's proxy rules, including § 240.14a-9, which prohibits materially false or misleading statements in proxy soliciting materials;

(4) **Personal grievance**; special interest: If the proposal relates to the redress of a personal claim or grievance against the company or any other person, or if it is designed to result in a benefit to you, or to further a personal interest, which is not shared by the other shareholders at large;

(5) **Relevance**: If the proposal relates to operations which account for less than 5 percent of the company's total assets at the end of its most recent fiscal year, and for less than 5 percent of its net earnings and gross sales for its most recent fiscal year, and is not otherwise significantly related to the company's business;

(6) **Absence of power/authority**: If the company would lack the power or authority to implement the proposal;

(7) **Management functions**: If the proposal deals with a matter relating to the company's ordinary business operations;

(8) **Director elections**: If the proposal:

(i) Would disqualify a nominee who is standing for election;

(ii) Would remove a director from office before his or her term expired;

(iii) Questions the competence, business judgment, or character of one or more nominees or directors;

(iv) Seeks to include a specific individual in the company's proxy materials for election to the board of directors; or

(v) Otherwise could affect the outcome of the upcoming election of directors.

(9) **Conflicts with company's proposal**: If the proposal directly conflicts with one of the company's own proposals to be submitted to shareholders at the same meeting;

Note to paragraph (i)(9): A company's submission to the Commission under this section should specify the points of conflict with the company's proposal.

(10) **Substantially implemented**: If the company has already substantially implemented the proposal;

Note to paragraph (i)(10): A company may exclude a shareholder proposal that would provide an advisory vote or seek future advisory votes to approve the compensation of executives as disclosed pursuant to Item 402 of Regulation S-K (§ 229.402 of this chapter) or any successor to Item 402 (a "say-on-pay vote") or that relates to the frequency of say-on-pay votes, provided that in the most recent shareholder vote required by § 240.14a-21(b) of this chapter a single year (i.e., one, two, or three years) received approval of a majority of votes cast on the matter and the company has adopted a policy on the frequency of say-on-pay votes that is consistent with the choice of the majority of votes cast in the most recent shareholder vote required by § 240.14a-21(b) of this chapter.

(11) **Duplication**: If the proposal substantially duplicates another proposal previously submitted to the company by another proponent that will be included in the company's proxy materials for the same meeting;

(12) **Resubmissions:** If the proposal deals with substantially the same subject matter as another proposal or proposals that has or have been previously included in the company's proxy materials within the preceding 5 calendar years, a company may exclude it from its proxy materials for any meeting held within 3 calendar years of the last time it was included if the proposal received:

- (i) Less than 3% of the vote if proposed once within the preceding 5 calendar years; or
- (ii) Less than 6% of the vote on its last submission to shareholders if proposed twice previously within the preceding 5 calendar years; or
- (iii) Less than 10% of the vote on its last submission to shareholders if proposed three times or more previously within the preceding 5 calendar years; and

(13) **Specific amount of dividends:** If the proposal relates to specific amounts of cash or stock dividends.

(j) Question 10: What procedures must the company follow if it intends to exclude my proposal?

(1) If the company intends to exclude a proposal from its proxy materials, it must file its reasons with the Commission no later than 80 calendar days before it files its definitive proxy statement and form of proxy with the Commission. The company must simultaneously provide you with a copy of its submission. The Commission staff may permit the company to make its submission later than 80 days before the company files its definitive proxy statement and form of proxy, if the company demonstrates good cause for missing the deadline.

(2) The company must file six paper copies of the following:

- (i) The proposal;
- (ii) An explanation of why the company believes that it may exclude the proposal, which should, if possible, refer to the most recent applicable authority, such as prior Division letters issued under the rule; and
- (iii) A supporting opinion of counsel when such reasons are based on matters of state or foreign law.

(k) Question 11: May I submit my own statement to the Commission responding to the company's arguments?

Yes, you may submit a response, but it is not required. You should try to submit any response to us, with a copy to the company, as soon as possible after the company makes its submission. This way, the Commission staff will have time to consider fully your submission before it issues its response. You should submit six paper copies of your response.

(l) Question 12: If the company includes my shareholder proposal in its proxy materials, what information about me must it include along with the proposal itself?

(1) The company's proxy statement must include your name and address, as well as the number of the company's voting securities that you hold. However, instead of providing that information, the company may instead include a statement that it will provide the information to shareholders promptly upon receiving an oral or written request.

(2)rThe company is not responsible for the contents of your proposal or supporting statement.r

(m) Question 13: What can I do if the company includes in its proxy statement reasons why it believes shareholders should not vote in favor of my proposal, and I disagree with some of its statements?

(1)r The company may elect to include in its proxy statement reasons why it believes shareholders should vote against your proposal. The company is allowed to make arguments reflecting its own point of view, just as you may express your own point of view in your proposal's supporting statement.

(2)rHowever, if you believe that the company's opposition to your proposal contains materially false or misleading statements that may violate our anti-fraud rule, § 240.14a-9, you should promptly send to the Commission staff and the company a letter explaining the reasons for your view, along with a copy of the company's statements opposing your proposal. To the extent possible, your letter should include specific factual information demonstrating the inaccuracy of the company's claims. Time permitting, you may wish to try to work out your differences with the company by yourself before contacting the Commission staff.

(3)rWe require the company to send you a copy of its statements opposing your proposal before it sends its proxy materials, so that you may bring to our attention any materially false or misleading statements, under the following timeframes:

(i)r If our no-action response requires that you make revisions to your proposal or supporting statement as a condition to requiring the company to include it in its proxy materials, then the company must provide you with a copy of its opposition statements no later than 5 calendar days after the company receives a copy of your revised proposal; or

(ii)r In all other cases, the company must provide you with a copy of its opposition statements no later than 30 calendar days before its files definitive copies of its proxy statement and form of proxy under § 240.14a-6.



FedEx Express
Customer Support Trace
3875 Airways Boulevard
Module H, 4th Floor
Memphis, TN 38116

U.S. Mail: PO Box 727
Memphis, TN 38194-4643
Telephone: 901-369-3600

EXHIBIT D

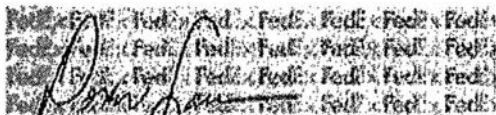
December 1, 2017

Dear Customer:

The following is the proof-of-delivery for tracking number

Delivery Information:

Status:	Delivered	Delivered to:	Receptionist/Front Desk
Signed for by:	D. JACKSON	Delivery location:	5500 MARKET ST 128
Service type:	FedEx Priority Overnight	Delivery date:	YOUNGSTOWN, OH 44512 Nov 30, 2017 09:29



Shipping Information:

Tracking number:	***	Ship date:	Nov 29, 2017
		Weight:	0.5 lbs/0.2 kg

Recipient:
Dr. Anil Choudary Malluri
5500 Market Street
Suite 128
YOUNGSTOWN, OH 44512 US

Shipper:
Avalon Holdings Corp.
One American Way
Warren, OH 44484 US

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*11/10 08:22			3918	TRANSMIT	ECM 8	OK 01'31
11/29 09:18	93307833238		3919	TRANSMIT	G3 11	OK 05'51

EXHIBIT E**ANIL CHOUDARY NALLURI, M.D., A.B.P.N., INC.**

Child and Adult Psychiatry

Certified by The American Board of Psychiatry and Neurology

Certified by The American Board of Forensic Psychiatry, March, 2005 - December 31, 2015 - Recertified April 3, 2017 - Expires - April 3, 2027

Certified by The American Board of Independent Medical Examiners

Distinguished Life Fellow of The American Psychiatric Association

Assistant Professor of Psychiatry
Northeastern Ohio Universities
College of Medicine
1979-2012

5500 Market Street, Suite 128
Youngstown, Ohio 44512
Phone: 330-783-1147
Fax: 330-783-3238

Member of Teaching Faculty
At St. Elizabeth Hospital
Medical Center
1979 - 2012

December 8, 2017

VIA FAX & US MAIL

Bryan Saksa, Secretary Avalon Holdings Co.
One American Way
Warren, OH 44484-5555
Fax (330) 856-8480

RE: SUBMISSION OF SHAREHOLDERS PROPOSAL FOR 2018 PROXY STATEMENT

Fellow Shareholders,

In accordance with Rule 14a-8 under the Securities Act of 1934, as amended, I hereby submit for presentation at the 2018 Annual Meeting of Shareholders (the "Meeting") of Avalon Holdings Corporation (the "Company") and inclusion in the proxy materials (i.e., the notice of meeting, proxy statement and proxy card) relating to the Meeting the following proposal and supporting statement.

Text of the Shareholder Proposal:

Election of Class A Director Anil Choudary Nalluri, M.D. ABPN;
Enclosed is my resume

Supporting Statement:

According to the publicly filed documents on September 30, 2017, the Company net operating revenue decreased by \$ 4.2 million from \$45.8 million from the first nine months of 2016 to \$ 41.6 million in the first nine months of 2017. Net operating income also decreased from \$300,000 in the first nine months of 2016 to a net operating loss of \$300,000 in the first nine months of 2017.

The Company is destroying shareholder value through decreasing net income per share and return on investment for shareholders. Net income per share has decreased from

\$.21 per share in the third quarter of 2016 to \$.14 in the third quarter of 2017. On December 31, 1998, the Company cash equivalent was \$22,274,000, which is equal to approximately \$5.85 per share, whereas of September 30, 2017, the Company cash equivalent of \$1,615,000 is equal to approximately \$1.95 per share, a decrease of 67%. The Company operating revenue of the third quarter of 2017 was \$16.4 million compared with the same third quarter of 2016 was \$19.1 million. No dividends have been paid or other return to shareholders. Allocation of capital by the company, the company's board of directors has been very disappointing. We believe it is essential that the board of directors focus its attention on maximizing shareholder value in order to preserve the diminished value of the remains. As of today, the liquidation value of the AWX Stock in the open stock market is 8 million dollars.

Anil Choudary Nalluri should be elected as a Class A Director because along with his family, they own over 888,410 shares which is a majority of the Class A shares. He has been a share holder since the Company went public in the year of 1998. He has also owned and operated his own medical practice since 1978. Anil Choudary Nalluri's goal if elected as a Class A Director is to maximize each shareholder's value.

The Company is violating their fiduciary duty which is causing poor performance of the company and deficient yield for shareholders. Anil Choudary Nalluri will be the best next director due to his experience with the Company and large financial stake.

Anil Nalluri MD 12-8-2017

Anil C. Nalluri, M.D.

Certified by American Board of Psychiatry and Neurology, June 1981, certificate no. 22542
 Certified by the American Board of Forensic Psychiatry, 03/31/05, expires 12/31/15, certificate no. 1554 Re Certified April 3, 2017 Expires 04-03-2027 (one out of 2500 psychiatrists in the United States)
 Certified by American Board of Independent Medical Examiners 10/06/98, expires 10/06/18, certificate no. 98-01228 (one out of 11 psychiatrists in the United States)
 Lifetime Continuing Education Hours AMA Guides 4th, 5th, & 6th Editions and Forensic Psychiatry (over 2,000 hours)
 Pennsylvania Independent Rating Evaluator for the Bureau of Workers' Compensation, August 2001-02/20/2013
 Assistant Professor of Psychiatry, NEOMED 07/19/82-12/31/12
 Fellow, American Academy of Disability Evaluating Physicians 11/15/97 - 12/31/03
 Fellow, American Psychiatric Association 12/19/97-12/31/02
 Distinguished Fellow, American Psychiatric Association 01/01/03-01/26/10
 Distinguished Life Fellow, American Psychiatric Association 01/27/10
 Ohio Medical License # 35-040657 issued 05/19/77, expires 04/01/20
 Pennsylvania Medical License# MD-037040-L issued 02/14/77, expires 12/31/18
 ACN

Date: December 8, 2017

Anil Nalluri MD
 Signature

Name/Title: Anil Choudary Nalluri

The original statement shall be signed by each person on whose behalf the statement is filed or his authorized representative. If the statement is signed on behalf of a person by his authorized representative (other than an executive officer or general partner of the filing person), evidence of the representative's authority to sign on behalf of such person shall be filed with the statement: provided, however, that a power of attorney for this purpose which is already on file with the Commission may be incorporated by reference. The name and any title of each person who signs that statement shall be typed or printed beneath his signature.

Attention: Intentional misstatements or omissions of fact constitute Federal criminal violations (See 18 U.S.C. 1001)

**UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
Washington, D.C. 20549**

OMB APPROVAL	
OMB Number:	3235-0145
Expires:	February 28,
2009 Estimated average burden	
hours per response:	14.5

SCHEDULE 13D

Under the Securities Exchange Act of 1934
(Amendment (29)*)

AVALON HOLDINGS CORPORATION

(Name of Issuer)

Class A Common Stock, \$0.01 par value

(Title of Class of Securities)

0534P109

(CUSIP Number)

Anil Choudary Nalluri 5500 Market Street, Suite 128 Youngstown, Ohio 44512 330-783-1147

(Name, Address and Telephone Number of Person Authorized to
Receive Notices and Communications)

December 8, 2017

(Date of Event which Requires Filing of this Statement)

If the filing person has previously filed a statement on Schedule 13G to report the acquisition that is the subject of this Schedule 13D, and is filing this schedule because of §§240.13d-1(e), 240.13d-1(f) or 240.13d-1(g), check the following box. ☐

Note: Schedules filed in paper format shall include a signed original and five copies of the schedule, including all exhibits. See §240.13d-7 for other parties to whom copies are to be sent.

The remainder of this cover page shall be filled out for a reporting person's initial filing on this form with respect to the subject class of securities, and for any subsequent amendment containing information which would alter disclosures provided in a prior cover page.

The information required on the remainder of this cover page shall not be deemed to be "filed" for the purpose of Section 18 of the Securities Exchange Act of 1934 ("Act") or otherwise subject to the liabilities of that section of the Act but shall be subject to all other provisions of the Act (however, see the Notes).

Persons who respond to the collection of information contained in this form are not required to respond unless the form displays a currently valid OMB control number.

SEC 1746 (3-06)

CUSIP No. 05343P109 13D

1. Names of Reporting Persons.
I.R.S. Identification Nos. of above persons (entities only).

Anil Choudary Nalluri

2. Check the Appropriate Box if a Member of a Group (See Instructions).

(a)

(b)

3. SEC Use Only

4. Source of Funds (See Instructions) PF

5. Check if Disclosure of Legal Proceedings Is Required Pursuant to Items 2(d) or 2(e) 6.

Citizenship or Place of Organization United States

Number of Shares Bene- ficially by Owned by Each Reporting Person With	7. Sole Voting Power	719,234
	8. Shared Voting Power	0
	9. Sole Dispositive Power	719,234
	10. Shared Dispositive Power	0

1	Aggregate Amount Beneficially Owned by Each Reporting Person	719,234
2	Check if the Aggregate Amount in Row (1) Excludes Certain Shares (See Instructions)	
13.e	Percent of Class Represented by Amount in Row (1)e	22.53%
14.e	Type of Reporting Person (See Instructions) INe	

- (1)e Classify the source of funds or other consideration used or to be used in making purchases as required to be disclosed pursuant to Item 3 of Schedule 13D and insert the appropriate symbol (or symbols if more than one is necessary) in row (4):e

Category of Source	Symbol
Subject Company (Company whose securities are being acquired)	SC
Bank	BK
Affiliate (of reporting person)	AF
Working Capital (of reporting person)	WC
Personal Funds (of reporting person)	PF
Other	OO

- (2) If disclosure of legal proceedings or actions is required pursuant to either Items 2(d) or 2(e) of Schedule 13D, row 5 should be checked.

- (3) *Citizenship or Place of Organization* - Furnish citizenship if the named reporting person is a natural person. Otherwise, furnish place of organization. (See Item 2 of Schedule 13D.)

- (7)-(11), (13) *Aggregate Amount Beneficially Owned by Each Reporting Person, etc.* — Rows (7) through (11) inclusive, and (13) are to be completed in accordance with the provisions of Item 5 of Schedule 13D. All percentages are to be rounded off to nearest tenth (one place after decimal point).

- (12) Check if the aggregate amount reported as beneficially owned in row (11) does not include shares which the reporting person discloses in the report but as to which beneficial ownership is disclaimed pursuant to Rule 13d-4 [17 CFR 240.13d-4] under the Securities Exchange Act of 1934.

- (14) *Type of Reporting Person* — Please classify each "reporting person" according to the following breakdown and place the appropriate symbol (or symbols, i.e., if more than one is applicable, insert all applicable symbols) on the form:

Category	Symbol
Broker-Dealer	BD
Bank	BK
Insurance Company	IC
Investment Company	IV
Investment Adviser	IA
Employee Benefit Plan or Endowment Fund	EP
Parent Holding Company/Control Person	HC
Savings Association	SA
Church Plan	CP
Corporation	CO
Partnership	PN
Individual	IN
Other	OO

Notes:

Attach as many copies of the second part of the cover page as are needed, one reporting person per page.

Filing persons may, in order to avoid unnecessary duplication, answer items on the schedules (Schedule 13D, 13G or

14D-1) by appropriate cross references to an item or items on the cover page(s). This approach may only be used where the cover page item or items provide all the disclosure required by the schedule item. Moreover, such a use of a cover page item will result in the item becoming a part of the schedule and accordingly being considered as "filed" for purposes of Section 18 of the Securities Exchange Act or otherwise subject to the liabilities of that section of the Act.

Reporting persons may comply with their cover page filing requirements by filing either completed copies of the blank forms available from the Commission, printed or typed facsimiles, or computer printed facsimiles, provided

the documents filed have identical formats to the forms prescribed in the Commission's regulations and meet existing Securities Exchange Act rules as to such matters as clarity and size (Securities Exchange Act Rule 12b-12).

SPECIAL INSTRUCTIONS FOR COMPLYING WITH SCHEDULE 13D

Under Sections 13(d) and 23 of the Securities Exchange Act of 1934 and the rules and regulations thereunder, the Commission is authorized to solicit the information required to be supplied by this schedule by certain security holders of certain issuers.

Disclosure of the information specified in this schedule is mandatory, except for I.R.S. identification numbers, disclosure of which is voluntary. The information will be used for the primary purpose of determining and disclosing the holdings of certain beneficial owners of certain equity securities. This statement will be made a matter of public record. Therefore, any information given will be available for inspection by any member of the public.

Because of the public nature of the information, the Commission can utilize it for a variety of purposes, including referral to other governmental authorities or securities self-regulatory organizations for investigatory purposes or in connection with litigation involving the Federal securities laws or other civil, criminal or regulatory statutes or provisions. I.R.S. identification numbers, if furnished, will assist the Commission in identifying security holders and, therefore, in promptly processing statements of beneficial ownership of securities.

Failure to disclose the information requested by this schedule, except for I.R.S. identification numbers, may result in civil or criminal action against the persons involved for violation of the Federal securities laws and rules promulgated thereunder.

General Instructions

- A.s The item numbers and captions of the items shall be included but the text of the items is to be omitted. The answers to the items shall be so prepared as to indicate clearly the coverage of the items without referring to the text of the items. Answer every item. If an item is inapplicable or the answer is in the negative, so state.s
- B. Information contained in exhibits to the statements may be incorporated by reference in answer or partials answer to any item or sub-item of the statement unless it would render such answer misleading, incomplete,s unclear or confusing. Material incorporated by reference shall be clearly identified in the reference by page,s paragraph, caption or otherwise. An express statement that the specified matter is incorporated by references shall be made at the particular place in the statement where the information is required. A copy of anys information orsa copy of the pertinent pages ofsa document containing such information which is incorporateds by reference shall be submitted with this statement as an exhibit and shall be deemed to be filed with thes Commission for all purposes of the Acts
- C.s If the statement is filed by a general or limited partnership, syndicate, or other group, the information called for by Items 2-6, inclusive, shall be given with respect to (i) each partner of such general partnership; (ii) eachs partner who is denominated as a general partner or who functions as a general partner of such limiteds partnership; (iii) each member of such syndicate or group; and (iv) each person controlling such partner or member. If the statement is filed by a corporation or if a person referred to in (i), (ii), (iii) or (iv) of this Instruction is a corporation, the information called for by the above mentioned items shall be given with respect to (a) each executive officer and director of such corporation; (b) each person controlling suchs corporation; and (c) each executive officer and director of any corporation or other person ultimately ins control of such corporation.s

In accordance with Rule 14a- 8 under the Securities Act of 1934, as amended, I hereby submit for presentation at the 2018 Annual Meeting of Shareholders (the "Meeting") of Avalon Holdings Corporation (the "Company") and inclusion in the proxy materials (i.e., the notice of meeting, proxy statement and proxy card) relating to the Meeting the following proposal and supporting statement.

Text of the Shareholder Proposal:

Election of Class A Director Anil Choudary Nalluri, M.D. ABPN:
Enclosed is my resume

Supporting Statement:

According to the publicly filed documents on September 30, 2017, the Company net operating revenue decreased by \$ 4.2 million from \$45.8 million from the first nine months of 2016 to \$ 41.6 million in the first nine months of 2017. Net operating income also decreased from \$300,000 in the first nine months of 2016 to a net operating loss of \$300,000 in the first nine months of 2017.

The Company is destroying shareholder value through decreasing net income per share and return on investment for shareholders. Net income per share has decreased from \$.21 per share in the third quarter of 2016 to \$.14 in the third quarter of 2017. On December 31, 1998, the Company cash equivalent was \$22,274,000, which is equal to approximately \$5.85 per share, whereas of September 30, 2017, the Company cash equivalent of \$1,615,000 is equal to approximately \$1.95 per share, a decrease of 67%. The Company operating revenue of the third quarter of 2017 was \$16.4 million compared with the same third quarter of 2016 was \$19.1 million. No dividends have been paid or other return to shareholders. Allocation of capital by the company, the company's board of directors has been very disappointing. We believe is it essential that the board of directors focus its attention on maximizing shareholder value in order to preserve the diminished value of the remains. As of today, the AWX stock value is approximately 8 million.

Anil Choudary Nalluri should be elected as a Class A Director because along with his family, they own over 888,410 shares which is a majority of the Class A shares. He has been a share holder since the Company went public in the year of 1998. He has also owned and operated his own medical practice since 1978. Anil Choudary Nalluri's goal if elected as a Class A Director is to maximize each shareholder's value.

The Company is violating their fiduciary duty which is causing poor performance of the company and deficient yield for shareholders. Anil Choudary Nalluri will be the best next director due to his experience with the Company and large financial stake.


I currently own 719,234 shares of Common A stock of Avalon Holdings Corporation, which presently has a market value of \$1,438,468 at the market price of \$2.00 now.

I intend to continue to hold these shares through the date of the Meeting. I either personally or through a representative also intends to attend the Meeting and present the proposal in this submission in accordance with Ohio law.

I am sending this submission via Priority US Mail and will retain proof of delivery and I will also fax a copy to 330-856-8480 which will be no later than December 15, 2017.

Anil C. Nalluri, M.D.

Date: December 8, 2017


Signature

Name/Title: Anil Choudary Nalluri

The original statement shall be signed by each person on whose behalf the statement is filed or his authorized representative. If the statement is signed on behalf of a person by his authorized representative (other than an executive officer or general partner of the filing person), evidence of the representative's authority to sign on behalf of such person shall be filed with the statement; provided, however, that a power of attorney for this purpose which is already on file with the Commission may be incorporated by reference. The name and any title of each person who signs the statement shall be

typed or printed beneath his signature.

Attention: Intentional misstatements or omissions of fact constitute Federal criminal violations (See 18 U.S.C. 1001)

E*TRADE
FINANCIAL1-800-ETRADE-4
www.etrade.com

May 2, 2017

Anil C. Nalluri

Re: E*TRADE Securities Account XXXX-***

Dear Anil Nalluri:

This letter is in response to your request for verification of Avalon Holdings Corporation, Class A (AWX) shares held in E*TRADE Securities account XXXX-***. We appreciate your time in making this request and we are happy to assist you.

Account number XXXX-*** is a Roth IRA brokerage account registered in the name of Anil C. Nalluri. This account was opened on January 13, 2010 and is currently in good standing. As of the time this letter was prepared on May 2, 2017, the account contained 346,316 Avalon Holdings Corporation, Class A (AWX) shares.

E*TRADE Securities LLC is committed to providing quality customer service. We hope that this information satisfies your request. Should you have any further questions, please feel free to contact a Financial Services Representative at 1-800-ETRADE-4, 24 hours a day, 7 days a week.

Sincerely,



Stephen Rowbury
Correspondence Department

PLEASE READ THE IMPORTANT DISCLOSURES BELOW.

The E*TRADE Financial family of companies provides financial services including trading, investing and banking products and services to retail customers.

Securities products and services are offered by E*TRADE Securities LLC, Member FINRA/SIPC.

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FINANCIAL

1-800-ETRADE
www.etrade.com

May 2, 2017

Anil Choudary Nalluri
Parvati Nalluri

Re: E*TRADE Securities Account XXXX-***

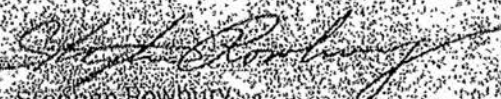
Dear Anil & Parvati Nalluri:

This letter is in response to your request for verification of Avalon Holdings Corporation Class A (AWX) shares held in E*TRADE Securities account XXXX-***. We appreciate your time in making this request and we are happy to assist you.

Account number XXXX-*** is a joint brokerage account registered in the names of Anil Choudary Nalluri and Parvati Nalluri. This account was opened on October 3, 1995, and is currently in good standing. As of the time this letter was prepared on May 2, 2017, the account contained 298,968 Avalon Holdings Corporation Class A (AWX) shares.

E*TRADE Securities, LLC is committed to providing quality customer service. We hope that this information satisfies your request. Should you have any further questions, please feel free to contact a Financial Services Representative at 1-800-ETRADE, 24 hours a day, 7 days a week.

Sincerely,

Stephen Rowbury
Correspondence Department**PLEASE READ THE IMPORTANT DISCLOSURES BELOW.**

The E*TRADE Financial family of companies provides financial services including trading, investing and banking products and services to retail customers.

Securities products and services are offered by E*TRADE Securities, LLC, Member FINRA/SIPC.

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