

UNITED STATES OF AMERICA  
Before the  
SECURITIES AND EXCHANGE COMMISSION  
Washington, D.C. 20549

ADMINISTRATIVE PROCEEDINGS RULINGS  
Release No. 2301/February 10, 2015

ADMINISTRATIVE PROCEEDING  
File No. 3-16318

In the Matter of

MICHAEL W. CROW,  
ALEXANDRE S. CLUG,  
AURUM MINING, LLC,  
PANAM TERRA, INC., AND  
THE CORSAIR GROUP, INC.

ORDER DENYING MOTION FOR A MORE  
DEFINITE STATEMENT

On February 2, 2015, this Office received Respondents' motion for a more definite statement (Motion) and memorandum of points and authorities in support (Memo). The Motion acknowledges that the Order Instituting Proceedings (OIP) "has, for the most part, made specific allegations of fraud." Motion, p. 2. However, the Motion contends that certain claims in the OIP regarding misrepresentations by Respondents in Aurum Mining, LLC's (Aurum) private placement memoranda and updates "fail to sufficiently inform Respondents of the charges against them so they can adequately prepare a defense." *Id.* Respondents acknowledge that "they are not entitled to disclosure of evidence in advance of the hearing." Memo, p. 2. *See Morris J. Reiter*, Securities Exchange Act of 1934 Release No. 6108, 1959 SEC LEXIS 588, at \*4-5 (Nov. 2, 1959) ("We have pointed out on prior occasions that appropriate notice of proceedings is given when the respondent is sufficiently informed of the nature of the charges against him so that he may adequately prepare his defense, and that he is not entitled to a disclosure of evidence."). On February 9, 2015, the Division filed an opposition (Opp.).

The OIP provides Respondents with legally sufficient notice of the misrepresentations. It alleges that Aurum's private placement memoranda of August and December 2011 and updates contained material misrepresentations and omissions regarding, among other things, acquisition of property interests in South America, closing conditions for escrowed funds, financial projections, testing, use of investor proceeds, and Respondent Crow's background. OIP ¶¶ 27-46. The OIP also alleges that Aurum's private placement memoranda of 2012 and 2013 contained misrepresentations about property interests in South America and prospects for success. OIP ¶¶ 47-60. Respondents also claim, regarding alleged misrepresentations in Aurum's Confidential Information Memorandum (CIM), that there were several drafts of the CIM, and the OIP fails to specify which draft contains the misrepresentations. Motion, p. 4. The Division states in its opposition that it has rectified this confusion by emailing Respondents'

counsel a copy of the CIM that it alleges contains the misrepresentations, which is the same document that was marked as an exhibit in the course of Respondent Crow's investigative testimony. Opp., p. 3.

The Motion is DENIED.

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Jason S. Patil  
Administrative Law Judge