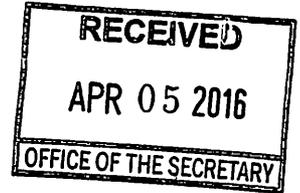


UNITED STATES OF AMERICA
Before the
SECURITIES AND EXCHANGE COMMISSION
Washington, D.C. 20549



In the Matter of:

MICHAEL W. CROW,
ALEXANDRE S. CLUG,
AURUM MINING, LLC, and
THE CORSAIR GROUP, INC.

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ADMINISTRATIVE PROCEEDING

File No. 3-16318

**ALEXANDRE S. CLUG'S PETITION FOR REJECTING DIVISION'S CROSS
PETITION**

I, Alexandre S. Clug, respectfully ask the Commission to not accept the Division of Enforcement's Cross Petition as it was submitted past the deadline for submission.

Facts:

1. ALJ, the Honorable Judge Patil issued his Initial Decision on February 8, 2016.
2. Respondent Alexandre Clug filed his petition for review on February 29, 2016.
3. The Division of Enforcement filed its Cross-Petition on April 1, 2016.

Argument:

Per Rule 410(b) of the Commission's Rules of Practice: "In the event a petition for review is filed, any other party to the proceeding may file a cross-petition for review within the original time allowed for seeking review or within ten days from the date that the petition for review was filed, whichever is later."

The 'original time allowed for seeking review' was twenty-one days from February 8, 2016, per the Honorable Judge Patil and per Rule 360(b) of the Commission's Rules of Practice.

The Division of Enforcement filed its Cross-Petition fifty-three days after the Initial Decision was issued, and thirty-two days after Respondent Alexandre Clug filed his petition for review. This is twenty-two days past the ten days allowed.

Petitions for corrections were filed by the Division and Michael Crow on February 18, 2016 and February 27, respectively. These corrections had nothing to do with Alexandre Clug's case and he was not a Party to these petitions. The corrections were specific to Michael Crow and related to some of his financials and the removal of references to his ex-girlfriend. The hearing officer's order resolving these were made on March 15, 2016. Alexandre Clug filed his petition for review on February 29th, 2016 well before this date of March 15, 2016. According to Rule 410(b), "...unless a party has filed a motion to correct an initial decision with the hearing officer. If such correction has been sought, a party shall have 21 days from the date of the hearing officer's order resolving the motion to correct to file a petition for review." However, Alexandre Clug was not a Party to these petitions for correction. Also, the filing of his petition for review, which was granted on March 22, 2016, was well before the Hearing Officer's ruling on the corrections further demonstrating that his petition for review, and the Division's resulting cross-petition, are distinct and separate from the correction petitions. The 'original' twenty-one days should thus be counted from the ALJ's Initial Decision date of February 8, 2016.

For the foregoing reasons, the Commission should grant this petition for the rejection of the Division's Cross-Petition.

Dated: April 5, 2016

Respectfully submitted,



By: Alexandre S. Clug

CERTIFICATE OF SERVICE

I hereby certify that on April 5, 2016, I served a copy of this Petition by fax and mail to the Commission's Secretary, Office of Administrative Law Judges, U.S. Securities and Exchange Commission, 100 F Street, NE, Mail Stop 1090, Washington, DC 20549, and a true and correct copy of the foregoing was furnished via Electronic Delivery to:

Office of the Administrative Law Judges at alj@sec.gov
Honorable Judge Jason S. Patil at Patilj@sec.gov
David Stoelting at StoeltingD@sec.gov