

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

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OFFICE OF THE SECRETARY

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In the Matter of:

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

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: ADMINISTRATIVE PROCEEDING  
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: File No. 3-16318  
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**ALEXANDRE S. CLUG'S PETITION FOR REVIEW OF INITIAL DECISION  
AND RATIFICATION ORDER**

Pursuant to Commission Rules of Practice 410(b) and 411(b)(2), I, Alexandre S. Clug, respectfully petition the Commission for review of the Initial Decision dated February 8, 2016 ("ID"), as corrected by the Order Granting the Division's Motion to Correct a Manifest Error of Fact dated March 15, 2016, and the Order Ratifying in Part and Revising in Part Prior Actions dated April 20, 2018 (the "Ratification Order").<sup>1</sup>

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<sup>1</sup> I also continue to assert the constitutional challenges I raised before ALJ Patil, which are incorporated herein by reference. I will not focus on those arguments in this Petition because I recognize that the Commission disagrees with them, and there has not (at least not yet) been a ruling by a court of appeals rejecting the Commission's conclusions. But I mention them here because I want to preserve the arguments so that I can raise them to a court of appeals if I seek further review, and also so that I can raise them to the Commission if an appeals court rules against the Commission's position on the Constitutional issues while this Petition is pending. I also continue to assert and preserve my arguments that the ratification process does not fix any of the relevant constitutionality issues.

I incorporate herein by reference my Petition for Review of the Initial Decision dated February 29, 2016 (the "Petition"), my Brief in Support of Petition for Review dated April 21, 2016, my Brief in Opposition to Division's Cross Petition for Review, and my Reply Brief in Support of Petition for Review dated July 5, 2016. Those filings set forth the grounds for review and rejection of certain of ALJ Patil's rulings, including the erroneous application of legal standards in reaching several of his conclusions as to my alleged violations, as well as in imposing penny stock and industry bars and a cease-and-desist order.

For the reasons detailed in the Petition and my briefs, I respectfully request that the Commission grant this Petition for Review

Dated: May 10, 2018

Respectfully submitted,

By:   
Alexandre S. Clug

### **CERTIFICATE OF SERVICE**

I hereby certify that on May 1, 2018, 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](mailto:alj@sec.gov)  
Honorable Judge Jason S. Patil at [Patilj@sec.gov](mailto:Patilj@sec.gov)  
David Stoelting at [StoeltingD@sec.gov](mailto:StoeltingD@sec.gov)