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Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF IDAHO**

IDAHO CONSERVATION LEAGUE and)
NORTHWEST ENVIRONMENTAL)
DEFENSE CENTER,)
)
Plaintiffs,)
)
v.)
)
ATLANTA GOLD CORPORATION,)
)
Defendant.)

Case No. 1:11-cv-161-REB

**SECOND DECLARATION OF
BRYAN HURLBUTT**

I, Bryan Hurlbutt, declare:

1. I am co-counsel of record for Plaintiffs in the above-captioned matter. I am over 21 years of age and have personal knowledge of the matters set forth below.
2. Attached hereto, as exhibits, are true and correct copies of the following:

- Exhibit 1: Atlanta Gold's Discharge Monitoring Reports for its wastewater treatment facility at the 900 Level Adit for the months of June through October 2016 provided by AGC's attorney Michelle Points on December 12, 2016;
- Exhibit 2: A September 22, 2016 cease and desist letter from the Idaho Department of Lands obtained by the Idaho Conservation League by public records request to the Idaho Department of Lands;
- Exhibit 3: Atlanta Gold Inc.'s Condensed Interim Consolidated Statements of Cash Flow, Three and Nine Months Ended September 30, 2016 and 2015, which I downloaded from the Atlanta Gold Inc. website (http://www.atgoldinc.com/images/financials/2016/Financial_statements_September_30_2016_November_23_2016_final.pdf) on December 20, 2016;
- Exhibit 4: Atlanta Gold Inc. Factsheet, which I downloaded from the Atlanta Gold Inc. website (http://www.atgoldinc.com/images/PDF/Factsheet/Atlanta_Gold_Inbrief_June%2021%202016%20final.pdf) on December 20, 2016;
- Exhibit 5: Atlanta Gold Inc. Summer 2016 Presentation, which I downloaded from the Atlanta Gold Inc. website (http://www.atgoldinc.com/images/PDF/presentations/ATLANTA_GOLD_CORPORATION-CHF_2016-Final_August_17_2016.pdf) on December 20, 2016; and
- Exhibit 6: Atlanta Gold Inc. Interim Management Discussion and Analysis Quarterly Highlights For the Three and Nine Months ended September 30, 2016 and 2015, which I downloaded from the Atlanta Gold Inc. website

(http://www.atgoldinc.com/images/financials/2016/MDA_FOR_Sept_30_2016-November_23_2016_final.pdf) on December 20, 2016.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 21st day of December, 2016, at Boise, Idaho.

/s/ Bryan Hurlbutt
Bryan Hurlbutt