

EXHIBIT “5”

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1 **1520**
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13 Attorneys for Gryphon Gold Corporation

14 **IN THE SECOND JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA**

15 **IN AND FOR THE COUNTY OF WASHOE**

16 GRYPHON GOLD CORPORATION, a
17 Nevada Corporation

18 Plaintiff,

19 vs.

20 GLOBAL RESOURCE MANAGEMENT,
21 INC., a Canadian company based in Toronto,
22 Ontario; WATERTON GLOBAL VALUE,
23 L.P., a limited partnership formed under the
24 laws of the British Virgin Islands;
25 WATERTON; WATERTON NEVADA
26 SPLITTER, LLC, a Nevada Limited liability
27 company, and BOREALIS MINGING
28 COMPANY, LLC, a Nevada Limited
liability company, and DOES 1-5,

Defendants.

Case No.: CV18-01557

Dept. No.: 6

**AFFIDAVIT OF PAUL ARTLEY IN SUPPORT OF
EX PARTE APPLICATION FOR A TEMPORARY RESTRAINING ORDER AND
MOTION FOR PRELIMINARY INJUNCTION**

I, Paul Artley, CPA, CFE, CAMS, hereby declare:

1. I have personal knowledge of the following, except anything stated upon information and belief, and as to those items I believe them to be true. I am making this

1 affidavit in support of the Ex Parte Application for a Temporary Restraining Order and Motion
2 for Preliminary Injunction filed by Plaintiff Gryphon Gold Corporation (the "Application").

3 2. I am a Partner with VAND Group, which has its Nevada office located in Reno,
4 Nevada. I am a licensed Private Investigator with the State of Nevada, License #2339A.

5 3. I am a Certified Public Accountant (CPA), Certified Fraud Examiner (CFE) and
6 former Special Agent with the FBI. I have also obtained CAMS certification from the
7 Association of Certified Anti-Money Laundering Specialists.

8 4. VAND was retained by G.R. Dawson Holdings, Ltd., by and through Murray
9 Bockhold, to investigate operations at the Borealis Mine located near Hawthorne, Nevada (the
10 "Mine").

11 5. Beginning on February 21, 2018, I began conducting surveillance on the Mine
12 and have continued that surveillance through July 27, 2018.

13 6. While a more thorough recital of my observations will be forthcoming in a
14 Report to be prepared shortly, I did witness the following during the aforementioned period of
15 observation:

- 16 (i) Whereas activity during the daytime hours was relatively consistent,
17 there was increased activity during some nights and this activity was
18 centered around the "Preg Pond" and the other ponds located at the
19 Mine.
- 20 (ii) This activity involved personnel, heavy equipment and trucks and was
21 done utilizing artificial lighting brought to the area.
- 22 (iii) The increased activity around the ponds generally commenced after
23 sundown and would cease before sunrise.
- 24 (iv) Activity occurring at the Mine during both day and night increased as the
25 surveillance period progressed.
- 26 (v) There were multiple occasions when a flat-bed semi-truck loaded with
27 what appeared to be white carbon sacks delivered and retrieved sacks

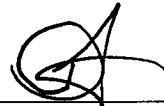
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from the mine. The most recent delivery and pickup occurred on July 25,
2018.

I swear under penalty of perjury that the foregoing statements in this affidavit are true.

DATED this 30TH day of July, 2018.

By: 
Paul Artley, CPA, CFE, CAMS
VAND Group

Subscribed and sworn to before me
this 30 day of July, 2018.


Notary Public

