NATIONAL FUTURES ASSOCIATION
BEFORE THE
BUSINESS CONDUCT COMMITTEE

In the Matter of:	)	
	)	
SUORITUS PARTNERS LLC	)	NFA Case No. 07-BCC-043
(NFA ID #306199),	)	
	)	
Respondent.	)	

COMPLAINT

Having reviewed the investigative report submitted by the Compliance Department of National Futures Association ("NFA"), and having found reason to believe that NFA Requirements are being, have been or are about to be violated and that the matter should be adjudicated, NFA's Business Conduct Committee issues this Complaint against Suoritus Partners LLC ("Suoritus").

ALLEGATIONS

JURISDICTION

1. At all times relevant to this Complaint, Suoritus was a commodity pool operator ("CPO") and NFA Member located in New York, New York.

APPLICABLE RULES

2. NFA Compliance Rule 2-13(a) provides, in pertinent part, that any Member who violates Commodity Futures Trading Commission ("CFTC") Regulations 4.7 and 4.16 through 4.41 shall be deemed to have violated an NFA requirement.

COUNT I

VIOLATION OF NFA COMPLIANCE RULE 2-13(a): FAILURE TO TIMELY FILE AN ANNUAL REPORT.

3. The allegations contained in paragraphs 1 and 2 are realleged as paragraph 3.

4. CFTC Regulation 4.22(c), which is incorporated into NFA Compliance Rule 2-13(a) by reference, provides, in pertinent part, that a CPO must file an annual report with NFA for each pool it operates within 90 calendar days after the end of the pool's fiscal year.

5. Pursuant to CFTC Regulation 4.7(b)(3), which is incorporated into NFA Compliance Rule 2-13(a) by reference, a CPO that meets certain requirements with regard to a commodity pool that it operates may claim relief for that commodity pool from the specific requirements of CFTC Regulation 4.22(c), e.g., the requirement that the annual report be certified, provided that, within 90 calendar days after the end of the commodity pool's fiscal year, the CPO files with NFA at least an uncertified annual report that contains certain limited financial information as prescribed by CFTC Regulation 4.7(b)(3).

6. Suoritus operates Gemini Futures Fund Ltd. ("Fund"), for which Suoritus filed an exemption under CFTC Regulation 4.7. Accordingly, at a minimum, Suoritus was required to file uncertified annual reports for the Fund, with the limited financial information prescribed in CFTC Regulation 4.7(b)(3), within 90 days of the Fund's fiscal year end, which is December 31st. Thus, the Fund's annual reports meeting the requirements of CFTC Regulation 4.7(b)(3) were originally due on April 2, 2007, which date was extended to May 30, 2007.

7. Suoritus failed to file the annual report for the Fund, which met the requirements of CFTC Regulation 4.7(b)(3), on or before May 30, 2007, the extended due date.

8. In September, Suoritus represented to NFA that it expected to have the annual report for the Fund completed by September 30th. To date, however, Suoritus has still not filed the required annual report.

9. By reason of the foregoing acts and omissions, Suoritus is charged with violations of NFA Compliance Rule 2-13(a).

PROCEDURAL REQUIREMENTS

ANSWER

You must file a written Answer to the Complaint with NFA within thirty days of the date of the Complaint. The Answer shall respond to each allegation in the Complaint by admitting, denying or averring that you lack sufficient knowledge or information to admit or deny the allegation. An averment of insufficient knowledge or information may only be made after a diligent effort has been made to ascertain the relevant facts and shall be deemed to be a denial of the pertinent allegation.

The place for filing an Answer shall be:

National Futures Association
200 West Madison Street
Suite 1600
Chicago, Illinois 60606-3447
Attn: Legal Department-Docketing

Failure to file an Answer as provided above shall be deemed an admission of the facts and legal conclusions contained in the Complaint. Failure to respond to any allegation shall be deemed an admission of that allegation. Failure to file an Answer as provided above shall be deemed a waiver of hearing.

POTENTIAL PENALTIES, DISQUALIFICATION AND INELIGIBILITY

At the conclusion of the proceedings conducted as a result of or in connection with the issuance of this Complaint, NFA may impose one or more of the following penalties:

(a) expulsion or suspension for a specified period from NFA membership;

(b) bar or suspension for a specified period from association with an NFA Member;

(c) censure or reprimand;

(d) a monetary fine not to exceed $250,000 for each violation found; and

(e) order to cease and desist or any other fitting penalty or remedial action not inconsistent with these penalties.

The allegations in this Complaint may constitute a statutory disqualification from registration under Section 8a(3)(M) of the Commodity Exchange Act. Respondents in this matter who apply for registration in any new capacity, including as an associated person with a new sponsor, may be denied registration based on the pendency of this proceeding.

Pursuant to the provisions of CFTC Regulation 1.63 penalties imposed in connection with this Complaint may temporarily or permanently render Respondents who are individuals ineligible to serve on disciplinary committees, arbitration panels and governing boards of a self-regulatory organization, as that term is defined in CFTC Regulation 1.63.

NATIONAL FUTURES ASSOCIATION
BUSINESS CONDUCT COMMITTEE

Dated: 11/14/07

By: _____
Chairperson

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AFFIDAVIT OF SERVICE

I, Nancy Miskovich-Paschen, on oath state that on November 14, 2007, I served a copy of the attached Complaint, by sending such copy in the United States mail, first-class delivery, and by overnight mail, in envelopes addressed as follows:

Suoritus Partners LLC
156 West 56th Street
Suite 2005
New York, NY 10019
Attn: Jean Marc Merine
Chief Investment Officer

Nancy Miskovich Paschen
Nancy Miskovich-Paschen

Subscribed and sworn to before me
on this 14th day of November 2007.

Mary A. Patton
Notary Public

OFFICIAL SEAL
Mary A. Patton
Notary Public, State of Illinois
MY COMMISSION EXPIRES 7-17-09