BEFORE THE
NATIONAL FUTURES ASSOCIATION

In the Matter of:	)	
	)	
ALTAMONT GLOBAL PARTNERS LLC	)	
(NFA ID #415751),	)	
	)	NFA Case No. 12-MRA-006
and	)	
	)	
JOHN G. WILKINS	)	
(NFA ID #407429)	)	

NOTICE OF MEMBER RESPONSIBILITY ACTION AND ASSOCIATE RESPONSIBILITY ACTION UNDER NFA COMPLIANCE RULE 3-15

National Futures Association (NFA) hereby gives notice to Altamont Global Partners LLC (AGP), a commodity pool operator (CPO) NFA Member and John G. Wilkins (Wilkins), an associated person (AP) and principal of AGP and an NFA Associate, that, pursuant to NFA Compliance Rule 3-15, the President of NFA, with the concurrence of NFA's Executive Committee, has taken a Member Responsibility Action (MRA) against AGP and an Associate Responsibility Action (ARA) against Wilkins, respectively, whereby:

1. Effective immediately, AGP, Wilkins or any personnel, employees or agents of AGP are prohibited from soliciting or accepting any funds from customers or investors for pools or other investment vehicles, including the Matterhorn Fund LLC (Matterhorn Fund), the McKinley Fund LLC (McKinley Fund) and the Binary Strategy One Fund LLC (Binary Fund) or placing any trades, except liquidation or risk reducing trades in the Matterhorn Fund, McKinley Fund, Binary Fund or any other customer account or fund over which AGP, Wilkins or any personnel of AGP exercise control;

2. AGP, Wilkins, LLC members and owners of AGP, and any other personnel, employees or agents of AGP are prohibited from disbursing or transferring any funds of AGP, funds of customers, investors or pools over which they exercise control, or participants in any such pools, without prior approval from NFA; such prohibition includes withdrawing or transferring funds from bank accounts, brokerage accounts, or accounts at other financial institutions which are in the name of AGP, Wilkins, or any of the LLC members or owners of AGP, or over which any of them exercise control, without prior approval from NFA; and

3. AGP and Wilkins are required to provide copies of this MRA/ARA via overnight courier to all: a) participants in the Matterhorn, McKinley and

Binary Funds; b) all commodity trading advisors who direct trading in either the Matterhorn, McKinley or Binary Funds or any account or investment vehicles over which AGP or Wilkins exercise control; and c) all financial institutions in which money, securities or any other property is on deposit in the name of AGP, the McKinley Fund, the Matterhorn Fund or the Binary Fund or any accounts over which AGP, Wilkins or any personnel, employees or agents of AGP exercise control.

This action is effective immediately and is deemed necessary to protect customers of AGP, and participants in the Matterhorn, McKinley and Binary Funds, as well as investors in any other commodity pools and other investment vehicles controlled by AGP and/or Wilkins, based on the following facts and circumstances: NFA has determined that Wilkins and AGP obtained substantial sums of money from investors which was to be invested in the Matterhorn and McKinley Funds (potentially in excess of $12 million); that Wilkins, an individual named Philip Leon (Leon), who is a the Managing Member of AGP (but is not listed as a principal or registered as an AP of the firm) and an individual named Paul Rangel (Rangel) who is an owner and vice president of AGP (but also not a listed principal or registered as an AP of the firm) misappropriated millions of dollars from the Matterhorn and McKinley Funds and converted such money to their own use; that AGP and Wilkins lied to NFA about the value of the assets of the Matterhorn and McKinley Funds; that Wilkins and AGP sent false pool statements to participants in the Matterhorn and McKinley Funds which inflated the value of participants' interests in order to conceal the fact that much, if not all, of their investments had been misappropriated and/or lost through trading; and that AGP and Wilkins wrongly claimed an exemption for AGP and its pools under Commodity Futures Trading Commission (CFTC) Regulation 4.13(a)(4) since AGP did not qualify for such exemption because many of the participants in the Funds were not "qualified purchasers."

In support of these actions, NFA attaches the affidavit of Sharon Pendleton, who is a Director in NFA's Compliance Department, and based thereon alleges as follows:

1. AGP is a CPO, forex firm, Member of NFA located in Longwood, Florida. AGP became a registered CPO and NFA Member on November 17, 2009 and forex firm approved on November 30, 2010. Wilkins is AGP's sole AP and also a principal of AGP and an NFA Associate. Wilkins became an approved principal and an AP and an NFA Associate of AGP on November 17, 2009 and a forex approved AP on November 30, 2011.

2. As mentioned above, Leon is a managing partner of AGP but is not listed as an NFA principal and is not an NFA Associate. Rangel owns one-third of AGP, oversees its sales force and is its vice president. However, like Leon, Rangel is not listed as a principal and is not an NFA Associate.

3. AGP operates three commodity pools and has filed CFTC Regulation 4.13(a)(4) notices of exemption for each of those pools. AGP filed the exemption notice for the Matterhorn Fund on November 5, 2009, for the

McKinley Fund on January 11, 2011 and for the Binary Fund on February 8, 2012 (collectively referred hereafter in some parts as the Funds).[1] However, in reviewing the subscription agreements for the Matterhorn Fund, NFA noted that at least 30 of the Matterhorn Fund's 99 participants would not qualify as "qualified purchasers."

4. On Thursday, June 14, 2012, NFA commenced an unannounced examination of AGP by visiting the firm's main office in Longwood, Florida. At that time, NFA provided Wilkins with a document request list and told Wilkins to provide all requested documents to NFA by Monday, June 18, 2012. Specifically, NFA asked for financial records which would support each Fund's net asset value (NAV) balance that had been most recently reported to participants in each Fund's March 31, 2012 quarterly statement.[2] As of that quarter end, AGP reported to participants that the McKinley Fund had a NAV of $6.5 million and the Matterhorn Fund had a NAV of $10 million.

5. On Thursday, Wilkins provided some (but not all) documents requested by NFA. These documents showed that the Matterhorn Fund had a purported balance of $9.9 million and that the McKinley Fund had a purported balance of $6.5 million. Wilkins said each Fund's balance was comprised of cash holdings at banks as well as futures, forex and equities holdings at brokerage firms, though he had not yet provided to NFA any third-party documents which would verify any of these purported NAVs.

6. While Wilkins provided some documents to NFA on Thursday, June 14, 2012, he did not come to AGP's office on Monday or Tuesday (June 18 and 19) supposedly because he had a medical emergency related to strep throat. In the meantime, staff started reviewing the accounting records as of May 31, 2012 and noted that the Matterhorn Fund had almost a $1.6 million receivable and the McKinley Fund had close to a $1.95 million receivable, both of which represented loans and/or advances each Fund made to its CPO and general partner, AGP. These loans and/or advances from the Funds to AGP totaled approximately $3.55 million and were taken between March 2009 and May 2012. Some of this money was used to pay AGP's operating expenses. However, much of this money, after being transferred from the Funds to an AGP bank account, was then paid in cash or checks to Leon (who received $1.2 million), Wilkins (who received $650,000) and Rangel (who received $550,000).

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1 Binary Fund only began accepting money in February 2012 and collected approximately $450,000 from two participants. Of that amount, $300,000 was returned to a participant via a redemption. There is approximately $150,000 on deposit in the name of the Binary Fund at brokerage firms and a bank. Since NFA believes this Fund is substantially whole, the remainder of this MRA/ARA focuses on activity in the Matterhorn and McKinley Funds.

2 March 31, 2012 is the most recent statement for each Fund.

7. On Monday, June 18, 2012, NFA confronted Leon about the receivable and told him that these loans violated NFA Compliance Rule 2-45, which prohibits loans by commodity pools to its CPO or any affiliated person or entity. NFA also attempted to communicate with Wilkins by e-mail and phone regarding the loan, but could not contact him. Leon told NFA that the loans were taken to cover operating expenses of the CPO and the CPO's commission payments to brokers. However, the private placement memorandum which was provided to each pool participant does not authorize the CPO to withdraw pool funds for these purposes.

8. Wilkins returned to the office on Wednesday, June 20, 2012 and confirmed that the loans covered all operating expenses for AGP, commission payments, travel and entertainment expenses and other cash withdrawals taken by the owners of AGP. Leon and Wilkins both claimed they were not aware that loans from pools to CPOs were prohibited by NFA Compliance Rule 2-45.

9. While Wilkins and Leon provided NFA with very general information regarding the loans and advances, NFA obtained other records which provided more specific detail regarding some of the loans. In particular, NFA's audit team was given a promissory note dated December 31, 2009 reflecting a loan to AGP for approximately $337,000 from the Matterhorn Fund. This note is due in January 2020 and provides for a quarterly interest payment of 3.25% from January 2010 to January 2020.

10. In addition, NFA also received an agreement dated January 4, 2012 reflecting a loan for $290,000 from AGP to Leon and Leon's wife. In reviewing the bank records for AGP and the McKinley Fund, it appears that the loan proceeds for this loan originated from the Matterhorn Fund's bank account which were transferred to AGP's bank account on January 3, 2012 and then the following day, January 4, 2012 were transferred to Leon's personal bank account.

11. Furthermore, in reviewing the bank records of AGP and the Funds to further determine how the "loans" were used, NFA noted significant activity each month, including checks paid directly to AGP's employees from the Funds' bank accounts and other purchases made with the Funds' assets which did not appear to be related to the operation of the Funds, including restaurant charges, tickets to sporting events, airfares, etc.

12. From the records NFA has reviewed, it does not appear that AGP has any actual income or that it has earned any management or incentive fees. The only money that AGP has taken in appears to be the money transferred to it from the Funds. Therefore, it appears highly unlikely that AGP will be able to repay the loans and advances it received from the Funds and that it was aware of this when it took the loans and advances.

13. NFA asked Wilkins and Leon if AGP had made any disclosure of the loans to its pool participants, and both admitted they had made none. Even worse, however, is the fact that the customer activity statements which AGP sent to the McKinley and Matterhorn pool participants did not reflect the impact of the $3.55 million in loans. Rather, the statements simply reflected a NAV which made it appear as though the $1.6 and 1.95 million in assets was still held in each Fund's name. When NFA confronted Wilkins and Leon with this information and pointed out that the statements significantly inflated the value of the pools and each participant's respective interest, Wilkins and Leon admitted that if every pool participant decided to redeem, the pools would have a significant shortfall as a result of the loans.

14. NFA then attempted to verify that the Matterhorn and McKinley Funds had assets beyond the receivables which would support the approximate $10 million (Matterhorn) and $6.5 million (McKinley) NAVs for each Fund reported to participants in the March 31, 2012 statements. Staff attempted to confirm a $7.3 million balance supposedly "held at brokers" as of March 31, 2012. However, Wilkins eventually told NFA Field Supervisor Peter Comes (Comes) that those funds did not exist and that it must have been a "typo" on the firm's balance sheet. Using third-party brokerage and bank statements as of March 31, 2012, NFA can only verify approximately $1 million in assets held in the name of the Matterhorn Fund, and about $2.2 million in assets held in the name of the McKinley Fund.[3] Therefore, it appears as if AGP and Wilkins initially misrepresented the value of the Funds to NFA and falsified the March 31, 2012 pool participant quarterly statements by grossly inflating each Fund's NAV.

15. On Thursday, June 21, Comes and NFA Manager Michael Braden (Braden) asked Wilkins to explain the major discrepancy between the balances reported to participants and actual Fund assets which could be independently verified. Wilkins admitted to Comes and Braden that he falsified the participant quarterly statements by not only hiding losses but also by inflating each Fund's NAV to make it appear as if trading had been successful. Wilkins claimed he did so because he did not want to report the actual trading losses to participants. In addition, during the same conversation, Wilkins also admitted that customers can log into each Fund's website to see monthly performance information, and that he falsified the Funds' monthly rates of return to likewise make it appear as if the pools were always making money. Finally, Wilkins also admitted to Comes and Braden that probably less than 2% of AGP's investors met the requirements of a "qualified purchaser" and that the Funds therefore wrongly claimed the CFTC 4.13(a)(4) exemption.

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[3] NFA excluded the value of the receivables from these calculations since it appears highly unlikely that they will be repaid.

16. While Wilkins admitted to these facts, he told Braden and Comes that he "preferred not to explain" why he authorized the disbursement of $3.55 million in "loans" from the Funds, but did say that other than the "loans" and the money which was redeemed by customers (approximately $387,000 from the Matterhorn Fund), the remainder of the invested funds was lost through trading. According to NFA's calculations, this would mean almost $5 million was lost to trading, though this amount has not yet been verified using independent third-party brokerage statements.

17. As of June 15, 2012, there is approximately $709,000 in assets held in the name of the Matterhorn Fund at banks and brokerage firms, and $1.94 million in assets held at banks and brokerage firms in the name of the McKinley Fund.

18. Based on the foregoing, it appears as if Wilkins and AGP have provided false and misleading information to NFA, that they have misappropriated a significant amount of the money AGP and the Funds received from investors and have also hidden significant trading losses from investors. In all, NFA believes the McKinley and Matterhorn Funds received almost $12 million from investors, just over $387,000 was withdrawn by investors, approximately $3.55 million was misappropriated by Wilkins, Leon and Rangel via the "loans" and almost $5 million may have been lost to trading. Of the initial almost $12 million invested, about $2.65 million is on deposit at various brokerage firms and a bank in the name of the Funds. Since Wilkins admitted that AGP provided the pool participants with false, inflated NAV information showing purported assets in excess of $17 million, NFA believes that investors have no idea that the true value of their investments never reached anywhere close to $17 million and in fact is under $3 million.

The MRA and ARA will remain in effect until such time as AGP and Wilkins have demonstrated to the satisfaction of NFA that they are in complete compliance with all NFA Requirements.

AGP and Wilkins are entitled to a prompt hearing on this matter before NFA's Hearing Committee if they so request. The request for a hearing shall be made in writing to:

National Futures Association
300 South Riverside Plaza
Suite 1800
Chicago, Illinois 60606
Attn: Legal Department-Docketing

E-Mail: Docketing@nfa.futures.org
Facsimile: 312-781-1672

Aggrieved parties may petition the CFTC for a stay of this MRA and ARA pending a hearing pursuant to and in conformity with the terms set forth in CFTC Regulation 171.41.

NATIONAL FUTURES ASSOCIATION

Date: 6-22-12

By: ______________________
Daniel J. Roth, President

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AFFIDAVIT

THE AFFIANT, SHARON PENDLETON, BEING DULY SWORN AND UNDER OATH STATES THAT:

1. My name is Sharon Pendleton, and I am employed by National Futures Association (NFA) as a Director in NFA's Compliance Department. In my capacity as a Director, I oversaw the examination and investigation of Altamont Global Partners, LLC (AGP) and John G. Wilkins (Wilkins). AGP is a CPO, forex firm, Member of NFA located in Longwood, Florida.

2. AGP became a registered CPO and NFA Member on November 17, 2009 and forex firm approved on November 30, 2010. Wilkins is AGP's sole associated person (AP) and also a principal of AGP and an NFA Associate. Wilkins became an approved principal and an AP and an NFA Associate of AGP on November 17, 2009 and a forex approved AP on November 30, 2011.

3. Philip Leon (Leon) is a managing partner of AGP but is not listed as an NFA principal and is not an NFA Associate. Paul Rangel (Rangel) owns one-third of AGP, oversees its sales force and is its vice president. However, like Leon, Rangel is not listed as a principal and is not an NFA Associate.

4. AGP operates three commodity pools and has filed Commodity Futures Trading Commission (CFTC) Regulation 4.13(a)(4) notices of exemption for each of those pools. AGP filed the exemption notice for the Matterhorn Fund LLC (Matterhorn Fund) on November 5, 2009, for the McKinley Fund LLC (McKinley Fund) on January 11, 2011 and for the Binary Strategy One Fund LLC (Binary Fund) on February 8, 2012 (collectively referred hereafter in some parts as the Funds).[1] However, in reviewing the subscription agreements for the Matterhorn Fund, NFA noted that at least 30 of the Matterhorn Fund's 99 participants would not qualify as "qualified purchasers."

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2012. Specifically, NFA asked for financial records which would support each Fund's net asset value (NAV) balance that had been most recently reported to participants in each Fund's March 31, 2012 quarterly statement.[2] As of that quarter end, AGP reported to participants that the McKinley Fund had a NAV of $6.5 million and the Matterhorn Fund had a NAV of $10 million.

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11. In addition, NFA also received an agreement dated January 4, 2012 reflecting a loan for $290,000 from AGP to Leon and Leon's wife. In reviewing the bank records for AGP and the McKinley Fund, it appears that the loan proceeds for this loan originated from the Matterhorn Fund's bank account which were transferred to AGP's bank account on January 3, 2012 and then the following day, January 4, 2012 were transferred to Leon's personal bank account.

12. Furthermore, in reviewing the bank records of AGP and the Funds to further determine how the "loans" were used, NFA noted significant activity each month, including checks paid directly to AGP's employees from the Funds' bank accounts and other purchases made with the Funds' assets which did not appear to be related to the operation of the Funds, including restaurant charges, tickets to sporting events, airfares, etc.

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15. NFA then attempted to verify that the Matterhorn and McKinley Funds had assets beyond the receivables which would support the approximate $10 million (Matterhorn) and $6.5 million (McKinley) NAVs for each Fund reported to participants in the March 31, 2012 statements. Staff attempted

to confirm a $7.3 million balance supposedly "held at brokers" as of March 31, 2012. However, Wilkins eventually told NFA Field Supervisor Peter Comes (Comes) that those funds did not exist and that it must have been a "typo" on the firm's balance sheet. Using third-party brokerage and bank statements as of March 31, 2012, NFA can only verify approximately $1 million in assets held in the name of the Matterhorn Fund, and about $2.2 million in assets held in the name of the McKinley Fund.[3] Therefore, it appears as if AGP and Wilkins initially misrepresented the value of the Funds to NFA and falsified the March 31, 2012 pool participant quarterly statements by grossly inflating each Fund's NAV.

16. On Thursday, June 21, Comes and NFA Manager Michael Braden (Braden) asked Wilkins to explain the major discrepancy between the balances reported to participants and actual Fund assets which could be independently verified. Wilkins admitted to Comes and Braden that he falsified the participant quarterly statements by not only hiding losses but also by inflating each Fund's NAV to make it appear as if trading had been successful. Wilkins claimed he did so because he did not want to report the actual trading losses to participants. In addition, during the same conversation, Wilkins also admitted that customers can log into each Fund's website to see monthly performance information, and that he falsified the Funds' monthly rates of return to likewise make it appear as if the pools were always making money. Finally, Wilkins also admitted to Comes and Braden that probably less than 2% of AGP's investors met the requirements of a "qualified purchaser" and that the Funds therefore wrongly claimed the CFTC 4.13(a)(4) exemption.

17. While Wilkins admitted to these facts, he told Braden and Comes that he "preferred not to explain" why he authorized the disbursement of $3.55 million in "loans" from the Funds, but did say that other than the "loans" and the money which was redeemed by customers (approximately $387,000 from the Matterhorn Fund), the remainder of the invested funds was lost through trading. According to NFA's calculations, this would mean almost $5 million was lost to trading, though this amount has not yet been verified using independent third-party brokerage statements.

18. As of June 15, 2012, there is approximately $709,000 in assets held in the name of the Matterhorn Fund at banks and brokerage firms, and $1.94 million in assets held at banks and brokerage firms in the name of the McKinley Fund.

19. Based on the foregoing, it appears as if Wilkins and AGP have provided false and misleading information to NFA, that they have misappropriated a significant amount of the money AGP and the Funds received from

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Further Affiant sayeth naught.

Sharon Pendleton

Subscribed and sworn to before me
on this 22nd day of June 2012.

Notary Public

OFFICIAL SEAL
CHRISTINE MAKINO
NOTARY PUBLIC - STATE OF ILLINOIS
MY COMMISSION EXPIRES OCTOBER 03, 2012

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AFFIDAVIT OF SERVICE

I, Nancy Miskovich-Paschen, on oath state that on June 22, 2012, I served copies of the attached Notice of Member Responsibility Action and Associate Responsibility Action Under NFA Compliance Rule 3-15, by sending such copies by e-mail and regular mail, first-class delivery, in envelopes addressed as follows to:

David Stawick
Office of the Secretariat
Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street, NW
Washington, DC 20581
E-mail: dstawick@cftc.gov

Tempest Thomas
Office of Proceedings
Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street, NW
Washington, DC 20581
E-mail: tthomas@cftc.gov

and by sending such copies by e-mail and overnight delivery, in envelopes addressed as follows to:

Altamont Global Partners LLC
195 Wekiva Springs Road
Suite 350
Longwood, FL 32779
Attn: John G. Wilkins
Partner/Vice-President of Operations
E-mail: jwilkins@matterhornfund.com

John G. Wilkins
2801 Wassum Trail
Chuluota, FL 32766
E-mail: jwilkins@matterhornfund.com

Institutional Liquidity LLC
2625 Denison Drive
Suite A
Mt. Pleasant, MI 48858
Attn: Mark Krier, CCO
E-mail: mark.krier@ilq.com

Advanced Markets LLC
11325 North Community House Road
Suite 425
Charlotte, NC 28277
Attn: Anthony Brocco, CEO
E-mail: abrocco@amifx.com

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Attn: Robert Hartman, President
E-mail: rhartman@rhartman.com

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Suite 101
Germantown, TN 38138
Attn: Tom Nesvick
E-mail: tom@nesvick.com