

**FORM ADV****Uniform Application for Investment Adviser Registration****Part II – Page 1**

Name of Investment Adviser: Altanes Investments, LLC				
Address: (Number and Street)	(City)	(State)	(Zip Code)	Area Code: Telephone Number:
330 Feeks Lane, P.O. Box 324	Mill Neck, NY		11765	(917) 696-6356

**This part of Form ADV gives information about the investment adviser and its business for the use of clients.  
The information has not been approved or verified by any governmental authority.**

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(Schedule A, B, C, D, and E are included with Part I of this Form, for the use of regulatory bodies, and are not distributed to clients.)

**Potential persons who are to respond to the collection of information contained in this form  
are not required to respond unless the form displays a currently valid OMB control number.**

**FORM ADV****Part II - Page 2**

Applicant:

Altanes Investments, LLC

SEC File Number:

801-

Date:

12/08/2010

**1. A. Advisory Services and Fees.** (check the applicable boxes)

For each type of service provided, state the approximate % of total advisory billings from that service.

(See instruction below.)

- Applicant:
- |                                     |     |   |      |
|-------------------------------------|-----|---|------|
| <input checked="" type="checkbox"/> | (1) | Provides investment supervisory services . . . . .  | 100% |
| <input type="checkbox"/>            | (2) | Manages investment advisory accounts not involving investment supervisory services . . . . .  | %    |
| <input type="checkbox"/>            | (3) | Furnishes investment advice through consultations not included in either service described above . . . .  | %    |
| <input type="checkbox"/>            | (4) | Issues periodicals about securities by subscription . . . . .   | %    |
| <input type="checkbox"/>            | (5) | Issues special reports about securities not included in any service described above . . . . .   | %    |
| <input type="checkbox"/>            | (6) | Issues, not as part of any service described above, any charts, graphs, formulas, or other devices which clients may use to evaluate securities . . . . . | %    |
| <input type="checkbox"/>            | (7) | On more than an occasional basis, furnishes advice to clients on matters not involving securities . . . .   | %    |
| <input type="checkbox"/>            | (8) | Provides a timing service . . . . .   | %    |
| <input type="checkbox"/>            | (9) | Furnishes advice about securities in any manner not described above . . . . .   | %    |

(Percentages should be based on applicant's last fiscal year. If applicant has not completed its first fiscal year, provide estimates of advisory billings for that year and state that the percentages are estimates.)

- B. Does the applicant call any of the services it checked above financial planning or some similar term? . . . .
- |                          |                                     |
|--------------------------|-------------------------------------|
| Yes                      | No                                  |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> |

**C. Applicant offers investment advisory services for: (check all that apply):**

- |   |  |
|---|--|
| <input checked="" type="checkbox"/> (1) A percentage of assets under management | <input type="checkbox"/> (4) Subscription fees |
| <input type="checkbox"/> (2) Hourly charges                                     | <input type="checkbox"/> (5) Commissions       |
| <input type="checkbox"/> (3) Fixed fees (not including subscription fees)       | <input type="checkbox"/> (6) Other             |

**D. For each checked box in A above, describe on Schedule F:**

- the services provided, including the name of any publication or report issued by the adviser on a subscription basis or for a fee
- applicant's basic fee schedule, how fees are charged and whether its fees are negotiable
- when compensation is payable, and if compensation is payable before service is provided, how a client may get a refund or may terminate an investment advisory contract before its expiration date

**2. Types of Clients - Applicant generally provides investment advice to: (check those that apply)**

- |  |   |
|--|---|
| <input checked="" type="checkbox"/> A. Individuals           | <input type="checkbox"/> E. Trusts, estates, or charitable organizations                    |
| <input type="checkbox"/> B. Banks or thrift institutions     | <input type="checkbox"/> F. Corporations or business entities other than those listed above |
| <input type="checkbox"/> C. Investment companies             | <input type="checkbox"/> G. Other (describe on Schedule F)                                  |
| <input type="checkbox"/> D. Pension and profit sharing plans |   |

Answer all items. Complete amended pages in full, circle amended items and file with execution page ( page 1).

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**3. Types of Investments.** Applicant offers advice on the following: (check those that apply)

- |  |   |
|--|---|
| <input checked="" type="checkbox"/> A. Equity Securities                   | <input type="checkbox"/> H. United States government securities     |
| <input checked="" type="checkbox"/> (1) exchange-listed securities         |   |
| <input checked="" type="checkbox"/> (2) securities traded over-the-counter | <input type="checkbox"/> I. Options contracts on:                   |
| <input checked="" type="checkbox"/> (3) foreign issues                     | <input type="checkbox"/> (1) securities                             |
|  | <input type="checkbox"/> (2) commodities                            |
| <input type="checkbox"/> B. Warrants                                       |   |
| <input type="checkbox"/> C. Corporate debt securities                      | <input type="checkbox"/> J. Futures contracts on:                   |
| (other than commercial paper)  | <input type="checkbox"/> (1) tangibles                              |
|  | <input type="checkbox"/> (2) intangibles                            |
| <input type="checkbox"/> D. Commercial paper                               |   |
| <input type="checkbox"/> E. Certificates of deposit                        | <input type="checkbox"/> K. Interests in partnerships investing in: |
| <input type="checkbox"/> F. Municipal securities                           | <input type="checkbox"/> (1) real estate                            |
|  | <input type="checkbox"/> (2) oil and gas interests                  |
| <input type="checkbox"/> G. Investment company securities                  | <input type="checkbox"/> (3) other (explain on Schedule F)          |
| <input type="checkbox"/> (1) variable life insurance                       | <input type="checkbox"/> L. Other (explain on Schedule F)           |
| <input type="checkbox"/> (2) variable annuities                            |   |
| <input type="checkbox"/> (3) mutual fund shares                            |   |

**4. Methods of Analysis, Sources of Information, and Investment Strategies.****A.** Applicant's security analysis methods include: (check those that apply)

- |   |  |
|---|--|
| (1) <input type="checkbox"/> Charting               | (4) <input type="checkbox"/> Cyclical                      |
| (2) <input checked="" type="checkbox"/> Fundamental | (5) <input type="checkbox"/> Other (explain on Schedule F) |
| (3) <input type="checkbox"/> Technical              |  |

**B.** The main sources of information applicant uses include: (check those that apply)

- |   |   |
|---|---|
| (1) <input checked="" type="checkbox"/> Financial newspapers and magazines    | (5) <input type="checkbox"/> Timing services  |
| (2) <input type="checkbox"/> Inspections of corporate activities              | (6) <input checked="" type="checkbox"/> Annual reports, prospectuses, filings with the Securities and Exchange Commission |
| (3) <input checked="" type="checkbox"/> Research materials prepared by others | (7) <input checked="" type="checkbox"/> Company press releases  |
| (4) <input type="checkbox"/> Corporate rating services                        | (8) <input type="checkbox"/> Other (explain on Schedule F)  |

**C.** The investment strategies used to implement any investment advice given to clients include: (check those that apply)

- |  |  |
|--|--|
| (1) <input checked="" type="checkbox"/> Long term purchases<br>(securities held at least a year) | (5) <input type="checkbox"/> Margin transactions   |
| (2) <input checked="" type="checkbox"/> Short term purchases<br>(securities sold within a year)  | (6) <input type="checkbox"/> Option writing, including covered options,<br>uncovered options or spreading strategies |
| (3) <input type="checkbox"/> Trading (securities sold within 30 days)                            |  |
| (4) <input type="checkbox"/> Short sales   | (7) <input type="checkbox"/> Other (explain on Schedule F)   |

Answer all items. Complete amended pages in full, circle amended items and file with execution page ( page 1).

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**5. Education and Business Standards.**

Are there any general standards of education or business experience that applicant requires of those involved in determining or giving investment advice to clients? . . . . .

Yes



No



(If yes, describe these standards on Schedule F.)

**6. Education and Business Background.**

For:

- each member of the investment committee or group that determines general investment advice to be given to clients, or
- if the applicant has no investment committee or group, each individual who determines general investment advice given to clients (if more than five, respond only for their supervisors)
- each principal executive officer of applicant or each person with similar status or performing similar functions.

On Schedule F, give the:

- |                 |  |
|-----------------|--|
| • name          | • formal education after high school               |
| • year of birth | • business background for the preceding five years |

**7. Other Business Activities.** (check those that apply)

- ☐ A. Applicant is actively engaged in a business other than giving investment advice.
- ☐ B. Applicant sells products or services other than investment advice to clients.
- ☐ C. The principal business of applicant or its principal executive officers involves something other than providing investment advice.

(For each checked box describe the other activities, including the time spent on them, on Schedule F.)

**8. Other Financial Industry Activities or Affiliations.** (check those that apply)

- ☐ A. Applicant is registered (or has an application pending) as a securities broker-dealer.
- ☐ B. Applicant is registered (or has an application pending) as a futures commission merchant, commodity pool operator or commodity trading adviser.
- C. Applicant has arrangements that are material to its advisory business or its clients with a related person who is a:
- |  |  |
|--|--|
| <input type="checkbox"/> (1) broker-dealer   | <input type="checkbox"/> (7) accounting firm                                       |
| <input type="checkbox"/> (2) investment company  | <input type="checkbox"/> (8) law firm  |
| <input type="checkbox"/> (3) other investment adviser  | <input type="checkbox"/> (9) insurance company or agency                           |
| <input type="checkbox"/> (4) financial planning firm   | <input type="checkbox"/> (10) pension consultant                                   |
| <input type="checkbox"/> (5) commodity pool operator, commodity trading adviser or futures commission merchant | <input type="checkbox"/> (11) real estate broker or dealer                         |
| <input type="checkbox"/> (6) banking or thrift institution   | <input type="checkbox"/> (12) entity that creates or packages limited partnerships |

(For each checked box in C, on Schedule F identify the related person and describe the relationship and the arrangements.)

- D. Is applicant or a related person a general partner in any partnership in which clients are solicited to invest?

Yes



No



(If yes, describe on Schedule F the partnerships and what they invest in.)

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**9. Participation or Interest in Client Transactions.**

Applicant or a related person: (check those that apply)

- ☐ A. As principal, buys securities for itself from or sells securities it owns to any client.
- ☐ B. As broker or agent effects securities transactions for compensation for any client.
- ☐ C. As broker or agent for any person other than a client effects transactions in which client securities are sold to or bought from a brokerage customer.
- ☐ D. Recommends to clients that they buy or sell securities or investment products in which the applicant or a related person has some financial interest.
- ☒ E. Buys or sells for itself securities that it also recommends to clients.

(For each box checked, describe on Schedule F when the applicant or a related person engages in these transactions and what restrictions, internal procedures, or disclosures are used for conflicts of interest in those transactions.)

Describe, on Schedule F, your code of ethics, and state that you will provide a copy of your code of ethics to any client or prospective client upon request.

- 10. Conditions for Managing Accounts.** Does the applicant provide investment supervisory services, manage investment advisory accounts or hold itself out as providing financial planning or some similarly termed services *and* impose a minimum dollar value of assets or other conditions for starting or maintaining an account?

Yes ☒ No ☐

(If yes, describe on Schedule F.)

- 11. Review of Accounts.** If applicant provides investment supervisory services, manages investment advisory accounts, or holds itself out as providing financial planning or some similarly termed services:

- A. Describe below the reviews and reviewers of the accounts. **For reviews**, include their frequency, different levels, and triggering factors. **For reviewers**, include the number of reviewers, their titles and functions, instructions they receive from applicant on performing reviews, and number of accounts assigned each.

Nicholas Jones, Principal, will perform reviews of all investment advisory accounts no less than quarterly. In addition, Mr. Jones will monitor the underlying securities on an ongoing basis. Accounts are reviewed for consistency with the investment strategy and performance among other things. Reviews may be triggered by changes in an account holder's personal, tax or financial status. Macroeconomic and company specific events may also trigger reviews. There is currently no limit on the number of accounts that can be reviewed by Mr. Jones.

- B. Describe below the nature and frequency of regular reports to clients on their accounts.

The account custodian will generate and send brokerage statements to the client no less than quarterly. These reports list the account positions, activity in the account over the covered period, and other related information. Altanes will not send clients any additional reports, unless a specific request is received from a client.

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**12. Investment or Brokerage Discretion.**

A. Does applicant or any related person have authority to determine, without obtaining specific client consent, the:

- |   |  |   |
|---|--|---|
| (1) securities to be bought or sold? .....                | Yes<br><input checked="" type="checkbox"/> | No<br><input type="checkbox"/>            |
| (2) amount of the securities to be bought or sold ? ..... | Yes<br><input checked="" type="checkbox"/> | No<br><input type="checkbox"/>            |
| (3) broker or dealer to be used ? .....                   | Yes<br><input type="checkbox"/>            | No<br><input checked="" type="checkbox"/> |
| (4) commission rates paid? .....                          | Yes<br><input type="checkbox"/>            | No<br><input checked="" type="checkbox"/> |

B. Does applicant or a related person suggest brokers to clients? .....

Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
--	--------------------------------

For each yes answer to A describe on Schedule F any limitations on the authority. For each yes to A(3), A(4) or B, describe on Schedule F the factors considered in selecting brokers and determining the reasonableness of their commissions. If the value of products, research and services given to the applicant or a related person is a factor, describe:

- the products, research and services
- whether clients may pay commissions higher than those obtainable from other brokers in return for those products and services
- whether research is used to service all of applicant's accounts or just those accounts paying for it; and
- any procedures the applicant used during the last fiscal year to direct client transactions to a particular broker in return for products and research services received.

**13. Additional Compensation.**

Does the applicant or a related person have any arrangements, oral or in writing, where it:

- |   |  |   |
|---|--|---|
| A. is paid cash by or receives some economic benefit (including commissions, equipment or non-research services) from a non-client in connection with giving advice to clients? ..... | Yes<br><input checked="" type="checkbox"/> | No<br><input type="checkbox"/>            |
| B. directly or indirectly compensates any person for client referrals? .....  | Yes<br><input type="checkbox"/>            | No<br><input checked="" type="checkbox"/> |

(For each yes, describe the arrangements on Schedule F.)

**14. Balance Sheet.** Applicant must provide a balance sheet for the most recent fiscal year on Schedule G if applicant:

- has custody of client funds or securities (unless applicant is registered or registering only with the Securities and Exchange Commission); or
- requires prepayment of more than \$500 in fees per client and 6 or more months in advance

Has applicant provided a Schedule G balance sheet? .....	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
--	---------------------------------	---

**Schedule F of****Form ADV****Continuation Sheet for Form ADV Part II**Adviser: Altanes Investments,  
LLC

SEC File Number:

801-

Date: 12/08/2010

(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other schedules.)

1. Full name of Adviser exactly as stated in Item 1A of Part I of Form ADV:

Altanes Investments, LLC

IRS Empl. Ident. No.:

20-0172486

Item of Form  
(identify)

Answer

**Item 1.D. & 1.C.**

This brochure provides information about the qualifications and business practices of Altanes Investments, LLC (hereinafter "Altanes"). Please contact Nicholas Parry Jones, Principal, if you have any questions about the contents of this brochure. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any State securities authority.

Additional information about Altanes is available on the Internet at [www.adviserinfo.sec.gov/IAPD/Content/Search/iapd\\_OrgSearch.aspx](http://www.adviserinfo.sec.gov/IAPD/Content/Search/iapd_OrgSearch.aspx). You can search this site by a unique identifying number, known as a CRD number. The CRD number for Altanes is **128386**.

**INVESTMENT SERVICES****PORTFOLIO MANAGEMENT SERVICES:**

Altanes is in the business of managing individually tailored investment portfolios. Our firm provides continuous advice to a client regarding the investment of client funds based on the individual needs of the client. Through personal discussions in which goals and objectives based on a client's particular circumstances are established, we develop a client's personal investment policy and create and manage a portfolio based on that policy. During our data-gathering process, we determine the client's individual objectives, time horizons, risk tolerance, and liquidity needs. We may also review and discuss a client's prior investment history, as well as family composition and background.

We will manage advisory accounts on a discretionary basis only. This means we will implement transactions without seeking prior client consent. Account supervision is guided by the stated objectives of the client (i.e., maximum capital appreciation, growth, income, or growth and income), as well as tax considerations. Clients may impose reasonable restrictions on investing in certain securities, types of securities, or industry sectors. Any such restrictions must be in writing.

Clients will have the opportunity to place reasonable restrictions on the types of investments which will be made on the client's behalf. Clients will retain individual ownership of all securities.

Fees:

Complete amended pages in full, circle amended items and file with execution page (page 1).

**Schedule F of****Form ADV****Continuation Sheet for Form ADV Part II**Adviser: Altanes Investments,  
LLC

SEC File Number:

801-

Date: 12/08/2010

(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other schedules.)

1. Full name of Adviser exactly as stated in Item 1A of Part I of Form ADV:

Altanes Investments, LLC

IRS Empl. Ident. No.:

20-0172486

Item of Form  
(identify)

Answer

The annual fee for Portfolio Management services will be charged as 1.00% percent of the clients' assets under management. Fees are billed quarterly in arrears, and are based on the account's average three month end asset value. Fees are prorated for accounts opened during the quarter.

A minimum of \$1,000,000 of assets under management is required for this service. This account size may be negotiable under certain circumstances.

Altanes may directly debit advisory fees from the client account if the following conditions are met:

1. The client provides written authorization permitting the adviser's fees to be paid directly from the client's account held by an independent custodian.
2. The adviser sends a Fee Statement to the client and the custodian at the same time. The client's Fee Statement will show the amount of the advisory fee and how it was calculated, while the custodian's Fee Statement will only show the amount of the advisory fee.
3. The adviser informs the client that it is the client's responsibility to verify the accuracy of the fee calculation and that the custodian will not determine whether the fee is properly calculated.
4. The custodian agrees to send to the client a statement, at least quarterly, indicating all amounts disbursed from the account including the amount of advisory fees paid directly to the adviser.

**GENERAL INFORMATION ON FEES**

The fee is charged as calculated as described above and is not charged on the basis of a share of capital gains upon or capital appreciation of the funds or any portion of the funds of an advisory client.

An advisory client will have a period of five (5) business days from the date of signing the investment advisory agreement to unconditionally rescind the agreement and receive a full refund of all fees. Thereafter, either party may terminate the investment advisory agreement with 30 days written notice. Thereafter, a client agreement may be canceled at any time, by either party, for any reason upon receipt of 30 days of written notice. Because fees are payable after

Complete amended pages in full, circle amended items and file with execution page (page 1).



**Schedule F of****Form ADV****Continuation Sheet for Form ADV Part II**Adviser: Altanes Investments,  
LLC

SEC File Number:

801-

Date: 12/08/2010

(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other schedules.)

1. Full name of Adviser exactly as stated in Item 1A of Part I of Form ADV:

Altanes Investments, LLC

IRS Empl. Ident. No.:

20-0172486

Item of Form  
(identify)

Answer

services are provided, there are no unearned fees and the client is not due a refund upon early terminate of an investment advisory contract. However Altanes' fees are prorated to the date of termination.

In addition to Altanes' advisory fees, clients are also responsible for the fees and expenses charged by custodians and imposed by broker dealers. Such fees may include, but are not limited to, any transaction charges, fees for duplicate statements and transaction confirmations, and fees for electronic data feeds and reports. In addition, some mutual fund assets deposited in the account may have been subject to deferred sales charges and 12(b)(1) fees. Mutual funds also have annual expenses, which are described in each fund's prospectus. Advisory clients should also note that fees for comparable services vary and lower fees for comparable services may be available from other sources.

**Item 5****EDUCATION AND BUSINESS STANDARDS**

Advisory persons associated with Altanes must possess, minimally, a college degree and/or appropriate business experience and all required licenses.

**Item 6****EDUCATION & BUSINESS BACKGROUND****NICHOLAS PARRY JONES****Born: 1959**Education:

Graduated from The Wharton School of the University of Pennsylvania in 1986 with a Bachelors of Business Administration.

Employment:

Altanes Investments, LLC, Principal and Portfolio Manager, 08/2003 to Present  
Ashland Management, Inc., Managing Director and Portfolio Manager, 10/1986 to 07/2003

**Item 9****CLIENT TRANSACTIONS**Code of Ethics Disclosure

Complete amended pages in full, circle amended items and file with execution page (page 1).

**Schedule F of****Form ADV****Continuation Sheet for Form ADV Part II**Adviser: Altanes Investments,  
LLC

SEC File Number:

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(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other schedules.)

1. Full name of Adviser exactly as stated in Item 1A of Part I of Form ADV:

Altanes Investments, LLC

IRS Empl. Ident. No.:

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Item of Form  
(identify)

Answer

**Item 9.E**

Altanes has adopted a Code of Ethics for the purpose of instructing its personnel in their ethical obligations and to provide rules for their personal securities transactions. Altanes and its personnel owe a duty of loyalty, fairness and good faith towards their clients, and the obligation to adhere not only to the specific provisions of the Code but to the general principles that guide the Code.

The Code covers a range of topics that may include: general ethical principles, reporting personal securities trading, exceptions to reporting securities trading, reportable securities, initial public offerings and private placements, reporting ethical violations, distribution of the Code and review and enforcement processes. Nicholas Jones, Principal, will provide a copy of the Code to any client or prospective client upon request.

**PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS**

Altanes or individuals associated with Altanes may buy or sell securities identical to or different than those recommended to clients for their personal accounts. In addition, any related person(s) may have an interest or position in a certain security(ies) which may also be recommended to a client.

It is the expressed policy of Altanes that no person employed by Altanes may purchase or sell any security prior to a transaction(s) being implemented for an advisory account, and therefore, preventing such employees from benefiting from transactions placed on behalf of advisory accounts.

As these situations represent a conflict of interest, Altanes has established the following restrictions in order to ensure its fiduciary responsibilities:

1) A principal or employee of Altanes shall not buy or sell securities for their personal portfolio(s) where their decision is substantially derived, in whole or in part, by reason of his or her employment unless the information is also available to the investing public on reasonable inquiry. No person of Altanes shall prefer his or her own interest to that of the advisory client.

2) Altanes maintains a list of all securities holdings for itself, and anyone associated with this advisory practice with access to advisory recommendations. These holdings are reviewed on a regular basis by Mr. Jones of Altanes.

3) Altanes emphasizes the unrestricted right of the client to decline to implement

Complete amended pages in full, circle amended items and file with execution page (page 1).

**Schedule F of****Form ADV****Continuation Sheet for Form ADV Part II**Adviser: Altanes Investments,  
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(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other schedules.)

1. Full name of Adviser exactly as stated in Item 1A of Part I of Form ADV:

Altanes Investments, LLC

IRS Empl. Ident. No.:

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Item of Form  
(identify)

Answer

any advice rendered, except in situations where Altanes is granted discretionary authority of the client's account.

4) Altanes requires that all individuals must act in accordance with all applicable Federal and State regulations governing registered investment advisory practices.

5) Any individual not in observance of the above may be subject to termination.

Michael Obuchowski, Member of Altanes, is also employed as a Managing Director and Chief Investment Officer of First Empire Asset Management, Inc., an unaffiliated SEC-registered investment adviser. Altanes does not have any arrangements with and does not refer clients to this firm.

**Item 10****CONDITIONS FOR MANAGING ACCOUNTS**

Altanes typically requires a minimum of \$1,000,000 to establish a new advisory account; however, this may be negotiable at Nicholas Jones' discretion. Mr. Jones may consider the aggregation of related client accounts to achieve the required minimum. In addition, Altanes may continue to service existing accounts that have values that are below the minimum.

**Items 12.A (1 & 2)****INVESTMENT DISCRETION**

Altanes will have discretion over the selection and amount of securities to be bought or sold without obtaining specific client consent.

For clients granting Altanes discretionary authority to determine which securities and the amounts of securities that are to be bought or sold for their account(s), we request that such authority be granted in writing, typically in the executed investment management agreement.

Should the client wish to impose reasonable limitations on this discretionary authority, such limitations shall be included in this written authority statement. Clients may change/amend these limitations as desired. Such amendments must be submitted to us by the client in writing.

**Item 12.B**

Complete amended pages in full, circle amended items and file with execution page (page 1).

**Schedule F of****Form ADV****Continuation Sheet for Form ADV Part II**Adviser: Altanes Investments,  
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SEC File Number:

801-

Date: 12/08/2010

(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other schedules.)

1. Full name of Adviser exactly as stated in Item 1A of Part I of Form ADV:

Altanes Investments, LLC

IRS Empl. Ident. No.:

20-0172486

Item of Form  
(identify)

Answer

**BROKERAGE RECOMMENDATIONS**

Altanes will not have discretion over the selection of the broker to be used and the commission rates to be paid.

As Altanes does not have the discretionary authority to determine the broker dealer to be used or the commission rates to be paid, clients must direct the firm as to the broker dealer to be used. In directing the use of a particular broker or dealer, it should be understood that Altanes will not have authority to negotiate commissions among various brokers or obtain volume discounts, and best execution may not be achieved. In addition, a disparity in commission charges may exist between the commissions charged to the client and those charged to other clients. Clients should be aware that not all advisers require clients to direct brokerage.

For clients in need of brokerage, and depending on client circumstances and needs, Altanes may recommend the use TD Ameritrade, Inc. or Grace Financial, LLC., unaffiliated, FINRA-registered brokers dealers, provided that such recommendation is consistent with Altanes' fiduciary duty to the client. Clients must evaluate these brokers before opening an account. The factors considered by Altanes when making this recommendation are the broker's ability to provide professional services, Altanes' experience with the broker, the broker's reputation, and the broker's quality of execution services and costs of such services, among other factors. Clients are not under any obligation to effect trades through any recommended broker.

As part of the TD Ameritrade and Grace Financial programs, Altanes receives benefits that it would not receive if it did not offer investment advice (See the disclosure under Item 13.A. of this Schedule F narrative).

**BLOCK TRADING**

In placing its orders to purchase or sell securities in accounts, Altanes may elect to aggregate orders. In so doing, the firm will not aggregate transactions unless aggregation is consistent with its duty to seek best execution and the terms of adviser's investment advisory agreement with each client for which trades are being aggregated. Additionally, Altanes will not favor any advisory client over any other client and each client that participates in an aggregated order will participate at the average share price for all adviser's transactions in that security on a given business day, with transaction costs shared pro-rata based on each client's participation in the transaction. Altanes will also prepare, before entering an aggregated order, a

Complete amended pages in full, circle amended items and file with execution page (page 1).

**Schedule F of****Form ADV****Continuation Sheet for Form ADV Part II**Adviser: Altanes Investments,  
LLC

SEC File Number:

801-

Date: 12/08/2010

(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other schedules.)

1. Full name of Adviser exactly as stated in Item 1A of Part I of Form ADV:

Altanes Investments, LLC

IRS Empl. Ident. No.:

20-0172486

Item of Form  
(identify)

Answer

written statement ("Allocation Statement") specifying the participating client accounts and how it intends to allocate the order among those clients.

If the aggregated order is filled in its entirety, it will be allocated among clients in accordance with the Allocation Statement. If the order is partially filled, it will be allocated pro-rata based on the Allocation Statement. Notwithstanding the foregoing, the order may be allocated on a basis different from that specified in the Allocation Statement if all client accounts receive fair and equitable treatment and the reason for different allocation is explained in writing and is documented in writing by Nicholas Jones no later than one hour after the opening of the markets on the trading day following the day the order was executed.

**13.A.****ADDITIONAL COMPENSATION**

As previously disclosed, Altanes participates in the TD Ameritrade Institutional and Grace Financial Institutional programs. While there is no direct linkage between the investment advice given and participation in the TD Ameritrade or Grace Financial programs, economic benefits are received which would not be received if Altanes did not give investment advice to clients. These benefits may include: receipt of duplicate client confirmations and account statements detailing trades, dividends and interest payments; access to block trading which provides the ability to aggregate securities transactions and then allocate the appropriate shares to client accounts; ability to have investment advisory fees deducted directly from client account (in accordance with federal and state regulations); access to an electronic communication network for client order entry and account information; access, for a fee, to enhanced trading and analytical tools; and access to a wide range of mutual funds of which over 900 have no transaction fee.

Complete amended pages in full, circle amended items and file with execution page (page 1).