

Mail Stop 4561

May 14, 2008

VIA USMAIL and FAX (260) 833 - 4411

Mr. Michael Pacult  
Chief Executive Officer  
Atlas Futures Fund, Limited Partnership  
505 Brookfield Drive  
Dover, Delaware 19901

**Re: Atlas Futures Fund, Limited Partnership  
Form 10-K for the year ended 12/31/2007  
Filed 3/31/2008  
File Nos. 333-53111**

Dear Mr. Michael Pacult:

We have reviewed your above referenced filing and have the following comments. We have limited our review to only your financial statements and related disclosures and will make no further review of your document. As such, all persons who are responsible for the adequacy and accuracy of the disclosures are urged to be certain that they have included all information required pursuant to the Securities Exchange Act of 1934.

In our comments, we may ask you to provide us with information so we may better understand your disclosures. Please be as detailed as necessary in your explanation. After reviewing this information, we may or may not raise additional comments.

Please understand that the purpose of our review process is to assist you in your compliance with the applicable disclosure requirements and to enhance the overall disclosures in your filings. We look forward to working with you in these respects. We welcome any questions you may have about our comments or on any other aspect of our review. Feel free to call us at the telephone numbers listed at the end of this letter.

FORM 10-K FOR THE YEAR ENDED DECEMBER 31, 2007

Item 7. Management's Discussion and Analysis of Financial Condition and Results of Operations

Results of Operations, page 8

1. In future filings please provide a more robust discussion of your results of operations including the drivers behind the changes in individual line items of your statement of operations. For example, we note you experienced increases in the net realized gains from investments and foreign currency transactions from 2006 to 2007, but you have not discussed the factors that contributed to this change. Your disclosures should include the three-year period covered by the financial statements and use year-to-year comparisons. Refer to Item 303(a)(3) of Regulation S-K and Release No. 33-8350 "Interpretation: Commission Guidance Regarding Management's Discussion and Analysis of Financial Condition and Results of Operations".

Certifications

2. We note that your certifications were not filed in the exact form as outlined in Item 601(B)(31)(i) of Regulation S-K. The discrepancies involve including the certifying individuals title in the opening sentence and omitting it at the end of the certification. Please confirm that in future filings, you will file certifications in the exact form as outlined in Item 601(B)(31)(i) of Regulation S-K.

\* \* \* \*

As appropriate, please respond to these comments within 10 business days or tell us when you will provide us with a response. Please submit a response letter on EDGAR that keys your responses to our comments and provides any requested information. Detailed response letters greatly facilitate our review. Please understand that we may have additional comments after reviewing your responses to our comments.

We urge all persons who are responsible for the accuracy and adequacy of the disclosures in the filings reviewed by the staff to be certain that they have provided all information investors require for an informed decision. Since the company and its management are in possession of all facts relating to a company's disclosures, they are responsible for the accuracy and adequacy of the disclosures they have made.

In connection with responding to our comments, please provide, in writing, a

Michael Pacult  
Atlas Futures Fund, Limited Partnership  
May 15, 2008  
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statement from the company acknowledging that

- the company is responsible for the adequacy and accuracy of the disclosures in the filings;
- staff comments or changes to disclosures in response to staff comments do not foreclose the Commission from taking any action with respect to the filings; and
- the company may not assert staff comments as a defense in any proceeding initiated by the Commission or any person under the federal securities laws of the United States.

In addition, please be advised that the Division of Enforcement has access to all information you provide to the staff of the Division of Corporation Finance in our review of your filings or in response to our comments on your filings.

You may contact Wilson K. Lee, at (202) 551-3468 or me at (202) 551- 3413 if you have questions.

Sincerely,

Cicely LaMothe  
Branch Chief