Regarding the matter of BlueCrest Capital Management Limited – Administrative Proceeding File Number 3-20162

We are writing in respect of the Proposed Plan of Distribution recently submitted by the Division of Enforcement of the SEC.

The Proposed Plan provides for the distribution of a Fair Fund which seek to compensate US investors for management fees paid in connection with investments in BlueCrest Capital International Master Fund Limited's two feeder funds covering the period October 1, 2011 to December 31, 2015.

We are availing of the opportunity to comment on the Proposed Plan and we contend it is unfair to those investors who are not eligible to benefit because they are not US tax resident and therefore do not qualify as US Investors for the purposes of the proposed allocation. Accordingly, we strongly disagree with the view of the Commission staff that the proposed allocation methodology constitutes a fair and reasonable allocation of the Fair Fund.

Please reconsider the proposed allocation to include all those investors who held BlueCrest Capital International Limited (BCI) shares during the relevant period and not just US investors on the basis it is not equitable or fair to differentiate investors in the same Fund vehicle based on geographical location of those investors.

We held an interest in the AllBlue funds which was a shareholder in BCI during the relevant period. We are a company listed on the London Stock Exchange.

V.Holmes Chairman

On behalf of Highbridge Tactical Credit Fund limited