

BROCHURE

Family Endowment Partners, L.P.

("FEP")

www.familyendowment.com

724 West Lancaster, Suite 104
Wayne, PA 19087

484-654-2600

This brochure provides information about the qualifications and business practices of Family Endowment Partners, L.P. If you have any questions about the contents of this brochure, please contact us at 484-654-2600. 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 Family Endowment Partners, L.P. is also available at the SEC's website at: www.adviserinfo.sec.gov

Family Endowment Partners L.P. is a registered investment advisor with the SEC. Registration does not imply a certain level of skill or training.

October 15, 2013

Item 2. Material Changes

The following Material Changes are being updated from our prior annual update of Form ADV Part 2A - Brochure (dated March 28, 2013)

- Offices:

FEP opened a new office in Boston, Massachusetts located at 800 Boylston Street, 16th Floor, Boston MA 02199.

- Mosaic:

Lee D. Weiss is a 100% owner of Mosaic Investment Partners (“MIP”), which changed its name to MIP Global, Inc. (“MIPG”), and Mosaic Enterprises, Inc, a Puerto Rico based company, (“MEI”). All funds and operations referenced in this section are referred to as (“Mosaic Investments” or “Mosaic Funds”).

MIPG, a Delaware Corporation, has control interests in:

- StillPoint Capital, LLC (“StillPoint”), a Florida based registered broker/dealer providing investment banking (private placement, merger & acquisition advisory services) and a securities licensing program for registered representatives.
- Global Domain Partners, LLC, the Investment Manager and Managing Member to the Global Domain Vector Fund, LLC, a Delaware Limited Liability Company, whose investment objective is to achieve capital appreciation consistent with principles designed to limit investor risk by investing primarily in a diversified portfolio of futures and forwards contracts in multiple markets, including foreign currencies, U.S. and non-U.S. equity indices, precious metals and energy contracts. More information about this fund may be obtained by reviewing its Confidential Offering Memorandum.
- MIPG is the Managing Member of Mosaic OTM, LLC, a Delaware based Corporation, which holds interests in Out There Media Holding GmbH (“OTM”), a Vienna, Austria based company, which provides technology and advertising to mobile phone carriers.

MEI, a Puerto Rico based company, has control interests in:

- Mosaic Investment Partners, Inc, a Puerto Rico based company, with the following interests and activities:
 - Equity ownership interests in Catamaran Management Company, Inc. (“Catamaran”), the investment manager to Catamaran Holding Fund, Ltd., an open-ended investment fund incorporated in the Cayman Islands, whose investment objective is to generate consistent, long-term capital growth, by investing, directly or indirectly, in securities such as exchange-traded funds, dollar and non dollar high grade fixed income investments negotiated in various capital markets. More information about this fund may be obtained by reviewing its Private Offering Memorandum.
 - Investment Manager to the Alliance Partners Fund, Ltd., a Cayman Islands based fund whose investment objective is to generate long-term capital appreciation and current income by opportunistically acquiring a diversified portfolio of investments in privately held and publicly traded early stage, small and middle market companies located in the United States and elsewhere in the world. Additional information related to this fund may be found in the funds’ Confidential Offering Memorandum.
 - Investment Manager to the I-DEA Investment Fund, Ltd, a Cayman Islands based fund, whose investment objective is to generate long-term capital appreciation through the exit strategies executed by seventeen diverse companies with a focus on social/digital media, internet, and life sciences. Additional information related to this fund may be found in the funds’ Confidential Offering Memorandum.
- MIP Global, Inc, a Puerto Rico Company, and a division of MEI, applied for and recently was approved as a full service broker/dealer with FINRA.

- Change in Fund Administrator for the FEP Fund I, LP and FEP Fund II, Ltd.

FEP Fund I, LP and FEP Fund II, Ltd. both changed their fund administrator from Alphametrix to Opus Fund Services (“Opus”). More information about Opus can be found at www.opusfundservices.com.

Item 3. Table of Contents

Cover Page	1
Material Changes	2
Table of Contents	3
Advisory Business	4
Fees and Compensation	6
Performance-Based Fees	7
Types of Clients	7
Methods of Analysis, Investment Strategies, and Risk of Loss	7
Disciplinary Information	8
Other Financial Industry Activities and Affiliations	8
Code of Ethics	8
Participation or Interest in Client Transactions and Personal Trading	9
Brokerage Practices	9
Review of Accounts	11
Client Referrals and Other Compensation	11
Custody	12
Investment Discretion	12
Voting Client Securities	12
Financial Information	13

Item 4. Advisory Firm

FEP (the “Advisor”) has been providing investment advisory services since January 1, 2008. FEP registered with the Securities & Exchange Commission in June 2009. The Principal owner of FEP is Lee D. Weiss.

Types of Services Provided

FEP is a registered investment advisor providing investment advisory services to high net worth individuals, investment limited partnerships, pension and profit sharing plans, trusts, estates, charitable organizations, foundations, corporations and business entities. FEP provides certain management, advisory and consulting services related to clients’ direct private investments.

Separately Managed Accounts

FEP provides investment advisory services to its clients. In providing these services, FEP seeks to provide investment advisory services that are consistent with the individual client’s financial and tax status and risk/reward objectives. Planning may be comprehensive or segmented and focus on investments, insurance, taxes and/or estate planning. Typically, FEP will allocate such client’s investment management assets, on a discretionary basis among investment managers, sub-advisors, mutual funds, exchange traded funds and pooled investment vehicles in accordance with the investment objectives of the client. FEP provides investment advisory services to the client relative to the on-going monitoring and review of account performance relative to the client’s objectives.

In addition, FEP may render non-discretionary investment advisory services to clients relative to assets that are held outside of a clients bank or brokerage account. In so doing, the client’s assets are included as part of the overall investment advisory services. Such additional assets may include: individual employer-sponsored retirement plans; alternative investments including, but not limited to, hedge funds, private equity and venture capital funds; additional brokerage accounts; bank accounts and other assets. Please see the Investment Advisory Agreement for additional information.

FEP Fund I, LP and FEP Fund II, Ltd.

The Advisor is the investment manager and general partner of FEP Fund I, LP (a Delaware Limited Partnership) and FEP Fund II, Ltd. (a Cayman Islands Exempted Company) which invest through other pooled investment vehicles, other investment managers (commonly referred to as a fund of funds) as well as direct private investments. FEP Fund I, LP and FEP Fund II, Ltd. invest in a number of funds, accounts and direct private investments managed and/or sponsored by affiliated and non-affiliated managers. Clients may be solicited to invest in these funds. Please see the FEP Fund I, LP and FEP Fund II, Ltd. offering materials for additional information.

General Partner Responsibilities related to Certain Legacy Assets

In some instances clients have contributed assets to private investments prior to engaging FEP as an investment advisor (such investments referred to as “Legacy Assets”). Certain of these limited partnership interests have no readily available market and are subject to restrictions on transfer or are otherwise illiquid. In some instances, certain underlying investors/limited partners have removed the prior general partner and appointed a new general partner related to these investments. FEP, along with the other lead investor representatives, serve as owners/managers of the respective general partners (“GP”). The GP function allows FEP to step into an active role providing more control and eliminating conflicts, off-market practices and other potential issues. The GP functions and/or responsibilities include, but are not limited to: Investment Manager, Administrator, Custodian and Tax Matters Partner. FEP may act as Investment Manager and Administrator, but does not act as the Custodian or Tax Matters Partner for these particular investments. Generally, each private investment overseen by FEP and other lead investors were structured as limited partnerships (“LP”), whereby investors provided capital to the LP and in turn the LP contributed equity and/or debt to an operating company in a range of industries and US based locations. In some cases the operating companies may require additional capital (for working capital and/or corporate development uses). As a result, FEP may solicit investors for follow-on capital contributions. The offering documents outline the GP obligations and investment policies for each respective private investment.

As of December 31, 2012, Family Endowment Partners LP has \$574,232,855 of assets under management on a discretionary basis and \$57,059,833 of assets under management on a non-discretionary basis.

Prior to engaging FEP to provide investment advisory services, the client will enter into one or more written agreements with the FEP setting forth the terms and conditions under which FEP shall render its services. Clients have an initial interview to review their tax status, financial situation and investment objectives. This process provides the client an opportunity to impose reasonable restrictions on the management of their relationship with FEP. It is the client’s responsibility to notify FEP at any time there are changes to their financial situation, liquidity needs, or investment objectives. Clients are encouraged to call at any time during normal business hours to discuss any questions or concerns. Clients will receive quarterly statements (or trade confirmations at the clients request) of account activity from the custodian firm. The client retains rights of ownership of all securities and funds in their account. FEP will, from time to time, provide reports of portfolio holdings, market value of assets performance and advisory fees to clients.

FEP may provide its clients with a broad range of comprehensive advisory services (which may include non-investment related matters). There may be a separate fee charged for these services.

Item 5. Fees and Compensation

FEP charges fees based on a percentage of client's assets under management. The fees are charged in advance or arrears based upon the market value of the assets on the last day of the previous period. In some cases, FEP may charge a fixed fee for investment advisory services. In most instances, fees are deducted from client accounts. FEP does not have access to the bank accounts and another party is responsible for compensating FEP. If a client prefers, they can be billed directly and remit a check or wire to pay for FEP investment advisory services.

When providing management and advisory/consulting services to clients, FEP will typically charge a fee based upon the time and billing rate for a particular engagement.

Separately Managed Accounts

FEP provides advisory services to clients who may allocate a portion, or none, of their assets to the FEP Fund I, LP, the FEP Fund II, Ltd, the Mosaic Funds or the Legacy Funds (collectively the "Funds"). Fees for these services are established according to each client's Investment Advisory Agreement. The typical fee charged is 1.0% and generally does not decline according to assets under management. In certain circumstances, a fee less than this amount may be charged. Fees are charged either quarterly in advance, or monthly in arrears, depending on the terms of the client agreement. If a client prefers they can be billed for the Firm's investment advisory services, but are also able to allow the fees to be deducted based on the Investment Advisory Agreement. If a client maintains separately managed accounts and invests in one or more of the Funds, they are charged a fee at the respective Fund level based on each particular Fund's documents, and may be charged a separate fee on those assets in the Separately Managed Account(s).

In addition to the fees charged by FEP, a fee may be charged by the investment managers or sub-advisors as well. Other charges may include mutual fund expenses, custodial fees and brokerage fees charged on individual purchase and sale transactions. Clients may be able to purchase certain investments that FEP recommends through other custodians, advisors or brokers. Clients who terminate their relationship with FEP are reimbursed a pro-rata portion of their advisory fees as described in our client agreement.

FEP Fund I, LP and FEP Fund II, Ltd.

The annual fee for FEP's management of these funds is pro-rated and charged quarterly, in advance, based upon the value of the assets on the last day of the previous quarter. The annual fee varies between 0.65% and 1.0% depending on the specific terms of the funds. In some cases FEP may be entitled to performance fees (i.e. carried interest) related to these funds. The terms are outlined in the respective funds offering documents and are available upon request.

General Partner Responsibilities Related to Certain Legacy Assets

FEP may receive fees for its services as General Partner. These fees are detailed in the respective investments offering materials or disclosed/consented to by the particular funds investors.

Additional Disclosure

Lee D. Weiss is a 100% owner of Mosaic Investment Partners (“MIP”), which changed its name to MIP Global, Inc. (“MIPG”), and Mosaic Enterprises, Inc, a Puerto Rico based company (“MEI”). All funds and operations referenced in this section referred to as (“Mosaic Investments” or “Mosaic Funds”).

MIPG, a Delaware Corporation, has control interests in:

- StillPoint Capital, LLC (“StillPoint”), a Florida based registered broker/dealer providing investment banking (private placement, merger & acquisition advisory services) and a securities licensing program for registered representatives.
- Global Domain Partners, LLC, the Investment Manager and Managing Member to the Global Domain Vector Fund, LLC, a Delaware Limited Liability Company, whose investment objective is to achieve capital appreciation consistent with principles designed to limit investor risk by investing primarily in a diversified portfolio of futures and forwards contracts in multiple markets, including foreign currencies, U.S. and non-U.S. equity indices, precious metals and energy contracts. More information about this fund may be obtained by reviewing its Confidential Offering Memorandum.
- MIPG is the Managing Member of Mosaic OTM, LLC, a Delaware based Corporation, which holds interests in Out There Media Holding GmbH (“OTM”), a Vienna, Austria based company that provides technology and advertising to mobile phone carriers.

MEI, a Puerto Rico based company, has control interests in:

- Mosaic Investment Partners, Inc, a Puerto Rico based company, with the following interests and activities:
 - Equity ownership interests in Catamaran Management Company, Inc. (“Catamaran”), the investment manager to Catamaran Holding Fund, Ltd., an open-ended investment fund incorporated in the Cayman Islands, whose investment objective is to generate consistent, long-term capital growth, primarily by investing, directly or indirectly, in liquid securities such as exchange-traded funds, dollar and non dollar high grade fixed income investments negotiated in various capital markets. More information about this fund may be obtained by reviewing its Private Offering Memorandum.
 - Investment Manager to the Alliance Partners Fund, Ltd., a Cayman Islands based fund whose investment objective is to generate long-term capital appreciation

and current income by opportunistically acquiring a diversified portfolio of investments in privately held and publicly traded early stage, small and middle market companies located in the United States and elsewhere in the world. Additional information related to this fund may be found in the funds' Confidential Offering Memorandum.

- Investment Manager to the I-DEA Investment Fund, Ltd, a Cayman Islands based fund, whose investment objective is to generate long-term capital appreciation through the exit strategies executed by seventeen diverse companies with a focus on social/digital media, internet, and life sciences, within an anticipated 3-7 year window. Additional information related to this fund may be found in the funds' Confidential Offering Memorandum.
- MIP Global, Inc, a Puerto Rico Company, and a division of MEI, applied for and recently was approved as a full service broker/dealer with FINRA.

Lee D. Weiss may receive commissions, management and/or incentive fees related to the Mosaic Funds as part of his compensation.

The Mosaic Funds and any other MIPG owned/sponsored operations may present a conflict of interest for FEPs clients. FEP seeks to disclose these potential conflicts of interest to its clients.

Item 6. Performance Based Fees

FEP does not currently engage in performance based fee arrangements related to its investment advisory services to its clients. In some cases, FEP may engage in performance based fee arrangements related to the private investments outlined in Section 4 of this Brochure and Mr. Lee D. Weiss may receive performance based fees related to those funds/investments outlined in Item 5. FEP has policies and procedures in place to disclose performance based arrangements related to these particular private investments in limited partnerships. In providing management and advisory/consulting services, FEP may receive success based fees in accordance with the respective consulting agreement entered into between FEP and a particular client.

Item 7. Types of Clients

FEP provides investment advisory services to high net worth individuals; investment limited partnerships, pension and profit sharing plans, other ERISA accounts, trusts, estates, charitable organizations, foundations, corporations and business entities.

The minimum account size is typically \$5,000,000, however exceptions can be made.

Item 8. Methods of Analysis, Investment Strategies and Risk of Loss

FEP looks to preserve capital while maintaining an appropriate client risk/return profile. We seek to model portfolios for our clients that meet each client's investment and liquidity needs. Our goal, over a business cycle, is to have reduced volatility and positive returns. We attempt to invest across the following investment types: US Equity, International Developed, International Emerging, Hedge Strategies Equities, Hedged Strategies Credit, Absolute Return, Fixed Income, Real Estate, Natural Resources and Cash. We customize each client's allocation taking into account their varying needs of liquidity, tax efficiencies, risk appetite and return expectations.

Our global perspective of asset allocation has resulted in FEP partnering with best-in-class institutional managers across the world in a broad spectrum of asset classes. These diverse investments seek to reduce risk and to help achieve each client's investment objectives. A long-term investment horizon is typically recommended balanced with liquidity needs. Our iterative investment process is to:

- Create a global allocation based upon investment opportunities and risks from around the world;
- Modify this allocation to create an individualized asset allocation that reflects a client's personal situation and unique mix of risk, return and liquidity objectives;
- Analyze individual investment manager performance, risk and portfolio construction to determine how each one meets the dynamics of the planned allocation and to ensure adequate diversification;
- Place assets in traditional or alternative investments to best fulfill the goals of the model allocation incorporating each client's financial objectives.

Our planning process considers factors that balance current income needs with asset preservation and growth objectives, risk vs. return profile, taxes and liquidity objectives, among other items.

Item 9. Disciplinary Information

Neither the Firm nor any employees are subject to any disciplinary proceedings.

Item 10. Other Financial Industry Activities and Affiliations

Lee D. Weiss is a Registered Representative of StillPoint Capital LLC. StillPoint is a registered broker/dealer with the Financial Industry Regulatory Authority and is a member of the Securities Investor Protection Corporation. StillPoint provides investment banking (private placement, merger & acquisition advisory services) and a securities licensing program for registered representatives. Other FEP employees may also be registered representatives of Stillpoint.

FEP may recommend securities offered by StillPoint or its affiliates as well as those funds listed in Item 5 of this Brochure. This may result in a conflict of interest for our advisory clients. FEP discloses such conflicts to its clients.

MIP Global, Inc, a Puerto Rico Company, and a division of MEI, applied for and recently was approved as a full service broker/dealer with FINRA.

FEP clients may invest in Meritage Capital, LP investment products. MFI Foundation and the Meredith Family Revocable Trust (related parties) are both investors in Family Endowment Partners, LP. MFI Capital, LLC ("MFI"), is owned by the Meredith Family Revocable Trust. MFI is the general partner to various Meritage Capital, LP funds.

Item 11. Code of Ethics

FEP has a Code of Ethics in place to which all employees are subject. The Code of Ethics sets forth the standards of conduct expected of its associated persons and requires compliance with the federal securities laws. In accordance with section 204A of the Advisers Act, its Code of Ethics contains policies reasonably designed to prevent the unlawful use of material non-public information by the firm or any of its associated persons. All employees are required to acknowledge in writing that they have reviewed and accept the Code of Ethics. A copy of the Firm's Code of Ethics will be provided upon request.

FEP may recommend to their clients the purchase of private limited partnerships or other investments that are sponsored by FEP, MIPG or Mosaic Investment Partners, Inc and/or other managers. When this occurs, the conflicts of interest are disclosed to clients through the relevant offering materials for that particular investment and/or by FEP during the recommendation process.

Applicable FEP personnel report their personal securities holdings and transactions and obtain pre-approval of certain investments such as initial public offerings and limited offerings, where applicable. Trading ahead of clients is prohibited. Should a conflict occur disclosure will be made to the client.

Item 11B. Participation or Interest in Client Transactions and Personal Trading

FEP may in certain instances, recommend to its separately managed account advisory clients, that it believes that a portion of the clients assets may be appropriate to invest in the Funds. In all cases, FEP will distribute all Fund documents and offering material to the client, and recommend that the client review the material to determine whether the investment is suitable for them. FEP does not invest any client money in the Funds without the client completing the applicable subscription documentation. See the Funds' offering material for relevant information. Please see our Code of Ethics above for our personal trading policies.

Item 12. Brokerage Practices

FEP clients primarily utilize Fidelity Investments and Charles Schwab Inc. as their custodian. FEP utilizes these custodians trading platform due to their respective financial strength, reputation, execution, pricing, research and service. The commissions and/or transaction fees charged by Fidelity or Schwab may be higher or lower than those charged by other broker-dealers. The commissions paid by the firm's clients shall comply with the firm's duty to obtain best execution. However, a client may pay a commission that is higher than another qualified broker-dealer might charge to effect the same transaction where the firm determines, in good faith, that the commission is reasonable in relation to the value of the brokerage and research services received. In seeking best execution, the determinative factor is not the lowest possible cost but whether the transaction represents the best qualitative execution, taking into consideration the full range of a broker-dealer's services, including among others the value or research provided execution capability, commission rates, and responsiveness. Consistent with the foregoing, while FEP will seek competitive rates, it may not necessarily obtain the lowest possible commission rates for client transactions.

If the client requests FEP to arrange for the execution of securities brokerage transactions for the client's account, FEP will direct such transactions through broker-dealers that FEP reasonably believes will provide best execution. Transactions may be cleared through other broker-dealers with whom FEP and the financial institution(s) have entered into agreements for prime brokerage clearing services. The Advisor shall periodically and systematically review its policies and procedures regarding recommending broker-dealers to its client in light of its duty to obtain best execution.

The client may direct FEP in writing to use a particular broker-dealer to execute some or all transactions for the client. In that case, the client will negotiate terms and arrangements for the account with that broker-dealer, and FEP will not seek better execution services or prices from other broker-dealers or be able to "batch" client transactions for execution through other broker-dealer with orders for other accounts managed by FEP. As a result, the client may pay higher commission or other transaction costs or greater spreads, or receive less favorable net prices, on transactions for the account than would otherwise be the case. Subject to its duty of best execution, FEP may decline a client's request to direct brokerage if, FEP's sole discretion, such directed brokerage arrangements would result in additional operational difficulties.

Transactions for each client generally will be effected independently, unless FEP decides to purchase or sell the same securities for several clients at approximately the same time. FEP may (but is not obligated to combine or “batch” such orders to obtain best execution, to negotiate more favorable commission rates, or to allocate equity among FEPs’ clients differences in prices and commissions or other transaction costs that might have been obtained had such orders been placed independently. Under this procedure, transactions will generally be averaged as to price and allocated among FEP clients pro-rata to the purchase and sale orders placed for each client on any given day. To the extent that FEP determines to aggregate client orders for the purchase or sale of securities, including securities in which FEP Advisory Affiliates may invest, FEP shall generally do so in accordance with applicable rules set under the Advisers Act and no-action guidance provided by the staff of the U.S. Securities and Exchange Commission. FEP shall not receive any additional compensation or remuneration as a result of the aggregation. In the event that FEP determines that a prorated allocation is not appropriate under the particular circumstances, the allocation will be made based upon other relevant factors, which may include when only a small percentage of the order is executed, share may be allocated to the account with the smallest order or the smallest position or to an account that is out of line with respect to security or sector weightings relative to other portfolios, with similar mandates; allocations may be given to one account when one account has limitations in its investment guidelines which prohibit it from purchasing other securities which are expected to produce similar investment results and can be purchased by other accounts; if an account reaches an investment guideline limit and cannot participate in an allocation, shares may be reallocated to other accounts (this may be due to unforeseen changes in an account’s assets after an order is placed); with respect to sale allocations, allocations may be given to accounts low in cash; in cases when a pro rata allocation of a potential execution would result in a de minimis allocation in one or more accounts, Family Endowment Partners may exclude the account(s) from the allocation; the transactions may be executed on a pro rata basis among the remaining accounts; or in cases where a small proportion of an order is executed in all accounts shares may be allocated to one or more accounts on a random basis.

Consistent with obtaining best execution, brokerage transactions may be directed to certain broker-dealers in return for investment research products and/or services which assist FEP in its investment decision-making process. Such research generally will be used to service all of the FEP clients, but brokerage commissions paid by one client may be used to pay for research that is not used in managing that client’s portfolio. The receipt of investment research products and /or services poses a conflict of interest.

FEP is not affiliated with Fidelity Investments or Charles Schwab. Independent Advisor Representatives of our firm are not registered representatives of either Fidelity Investments or Charles Schwab and do not receive any commissions or fees from recommending their services.

FEP may receive from Fidelity or Schwab, without cost to the firm, computer software and related systems support, which allows for better monitoring of client accounts maintained at Fidelity or Schwab. The software or related systems may be without cost

because the investment advisory or financial planning clients maintain assets at Fidelity or Schwab. The software may benefit FEP, but not its clients directly. Clients should be aware that the receipt of such benefits creates a conflict of interest since the benefits may influence the choice of broker-dealer over another broker-dealer that does not furnish similar software, systems support or services.

While FEP provides client advice on an individual basis, client trades may be executed as a block trade. No advisory account within the block trade will be favored over any other advisory account, and thus, each account will participate in an aggregated order at the average share price and receive the same commission rate. FEP will not aggregate a client's order if in a particular instance the Advisor believes the aggregation would cause the client's cost of execution to be increased. The Custodian will be notified of the amount of each trade for each account. The Advisor and/or its Investment Advisor Representatives("IARs") may participate in block trades with clients, and may also participate on a pro-rata basis for partial fills, but only if clients receive fair and equitable treatment.

Item 13. Review of Accounts

FEP monitors client portfolios as part of an ongoing process while regular account reviews are conducted on at least a quarterly basis. Such reviews are conducted by one of the firm's principals along with other appropriate personnel. FEP shall contact ongoing investment advisory and consulting clients at least annually to review its previous services and/or recommendations and to discuss the impact resulting from any changes in the client's financial situation and/or investment objectives.

Item 14. Client Referrals and Other Compensation

FEP may compensate for client referrals. All solicitors' agreements are in compliance with the Investment Advisers Act of 1940. In addition, all applicable federal and state laws will also be observed.

FEP may pay a referral fee for advisory service to an employee it supervises.

Item 15. Custody

FEP is deemed solely to have custody of client assets because of the fee deduction authority granted by the client in the Investment Advisory Agreement.

Separate Accounts

Clients of FEP will receive statements from the custodial firm that houses the accounts. FEP will, from time to time, send clients investment statements for these same accounts. Clients are encouraged to compare the two statements for accuracy. Minor variations may occur because of reporting dates, accrual methods of interest and dividends, and other factors. The custodial statement is the official record of your account for tax purposes for Separate Account assets and the K-1 or 1099 for private investments.

FEP Fund I, LP and FEP Fund II, Ltd.

FEP does have custody of the FEP Fund I, LP and FEP Fund II, Ltd. and its' assets. Management fees are deducted from these funds on a quarterly basis. Statements are sent out quarterly by the Fund Administrator along with the audited financial statements when available on an annual basis.

Legacy Funds

FEP serves as the GP on a number of private funds which clients invested in prior to hiring FEP. While each of these funds is different, each restricts FEP from having custody of funds as outlined in each respective GP's operating agreement. These legacy funds typically hold illiquid debt and/or equity investments. The custody of these private fund assets are outlined in Form ADV Part 1. Please contact FEP or the Custodian with any questions you have related to the custody of assets for these particular investments.

Lee D. Weiss as Trustee

In certain cases, certain Separate Account Clients have requested, and Lee Weiss has agreed to serve as trustee of their respective accounts. In those instances, FEP has policies and procedures in place to comply custody rules under the Investment Advisers Act of 1940 and amendments thereto.

Item 16. Investment Discretion

FEP's investment powers shall include full discretionary trading authority to buy, sell, exchange, convert, exercise, tender and otherwise trade in stocks, bonds and other property of any kind that is held within each client account. FEP shall also have the authority to place orders for securities transactions with any broker-dealer affiliate of the custodian designated on the account form and to arrange for delivery of and payment for any account investments through the broker-dealer or otherwise. FEP has the authority to delegate its powers, duties and responsibilities to one or more sub-advisors.

Item 17. Voting Client Securities

FEP may vote proxies on behalf of the FEP Fund I, LP and FEP Fund II, Ltd. holdings, where applicable, but generally does not vote proxies for Separate Account investment advisory clients. The firm will vote proxies for Private Investments held by its clients subject to a power of attorney. The firm will only cast proxy votes in a manner consistent with the best interest of its clients. All proxies will be voted according to the guidelines fully described in the Proxy Voting Policies and Procedures, as they may be amended from time to time. In situations where there may be a conflict of interest in the voting proxies due to business or personal relationships that the Advisor maintains with persons having an interest in the outcome of certain votes, the Advisor will take appropriate steps to ensure that its proxy voting decisions are made in the best interest of its clients and are not the product of such conflict. At any time, clients may contact FEP to request information about how the firm voted proxies for that client's securities or to get a copy of the Advisor's Proxy Voting Policies and Procedures.

Item 18. Financial Information

FEP does not require or solicit payment of \$1,200 in fees per client six months or more in advance.

FEP may sub-lease a portion of its' office space to third parties. In situations where this occurs, FEP takes precautionary steps to protect client information in accordance with its' privacy policy.