



Steben & Company, Inc.

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This brochure provides information about the qualifications and business practices of Steben & Company. If you have any questions about the contents of our brochure, please contact us at the telephone number or email address listed above. 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 Steben & Company also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

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## 1. Our Advisory Business:

### A. Overview

Steben & Company, Inc. (“Steben & Company”), founded in 1989, is an investment advisory firm specializing in managed futures. With over 20 years of experience, the Firm gives financial advisors, institutions and individual investors with the specialized expertise, advice and investment vehicles needed to understand, evaluate and access managed futures.

Steben & Company provides advisory services to four commodity pools for which the firm serves as manager or general partner: Futures Portfolio Fund, L.P.; Sage Fund, L.P.; Aspect Global Diversified Fund LP (to be re-named the Seneca Global Fund, L.P., effective May 1, 2011); and Steben Institutional Fund LLC (collectively, the Funds). These advisory services consist solely of managing, either directly or through the efforts of other registered investment advisory firms, the excess margin and other cash assets of the Funds, by investing these assets in high quality, fixed income securities. The cash management function is generally performed for each Fund in a similar manner, using policy statements and investment guidelines that are consistent across each of the Funds.

As of the date of this Brochure, Steben & Company had responsibility for managing approximately \$900m in excess margin balances and other cash assets of the Funds. Steben & Company currently utilizes two advisory firms—J.P. Morgan Investment Management and Principal Global Investors—to carry out the day-to-day management of these assets pursuant to investment advisory agreements with Steben & Company and each of the Funds.

Steben & Company is registered with the Commodity Futures Trading Commission (CFTC) as a commodity pool operator and an introducing broker, and with the Securities and Exchange Commission (SEC) as a broker dealer and an investment advisor. Steben & Company is a member of the National Futures Association (NFA) and the Financial Industry Regulatory Authority (FINRA).

### B. Firm Principals

<b>Kenneth E. Steben</b>	Founder, President and CEO	ken.steben@steben.com
<b>Michael D. Bulley</b>	SVP, Research & Risk Management	michael.bulley@steben.com
<b>Neil D. Menard</b>	SVP, Distribution	neil.menard@steben.com
<b>John H. Grady</b>	Chief Operating Officer and General Counsel	john.grady@steben.com
<b>Carl A. Serger</b>	Chief Financial Officer	carl.serger@steben.com

### C. Ownership and Legal Structure

Steben & Company is a Maryland Corporation that was organized in February 1989. Kenneth E. Steben Revocable Trust Dated January 29, 2008, or the Trust, has been a principal of Steben & Company since March 10, 2008. The Trust is the sole shareholder of Steben & Company. Kenneth Steben is the sole beneficiary of the Trust and serves as its sole trustee.

## 2. Fees and Compensation:

Steben & Company does not charge a separate fee for its services to the Fund in relation to cash management. Rather, Steben & Company receives a fee from each Fund, referred to as a management fee or general partner fee, which compensates the Firm for all of the services it provides to each Fund. The investment advisory firms engaged to manage the cash assets of each

Fund on a day-to-day basis are paid a fee based on the value of the assets entrusted to their management.

3. Performance-Based Fees:

Steben & Company does not charge or receive compensation based upon the performance of the Funds or any other measure of performance.

4. Types of Clients:

See “Overview” under Part 1, above.

5. Methods of Analysis, Investment Strategies and Risk of Loss

Steben & Company carries out its advisory responsibilities for the Funds by engaging unaffiliated SEC-registered investment advisory firms to manage the assets of each Fund entrusted to them pursuant to investment guidelines adopted and implemented by Steben & Company. These guidelines are intended to ensure that the Funds’ assets are managed with a focus on current income and preservation of the principal amount invested.

6. Disciplinary Information:

Steben & Company neither is nor has been, and no Steben & Company officer, employee or agent is or has been, the subject of or otherwise made the object of any administrative, legal or other disciplinary proceeding or action relating to its (or their business) as an investment adviser, broker-dealer or commodity pool operator.

7. Other Financial Industry Activities and Affiliations:

Steben & Company is registered as a broker-dealer with the SEC, and is also registered as a commodity pool operator and introducing broker with the CFTC. Steben & Company is a member of FINRA and the NFA. Steben & Company does not have any corporate affiliates.

8. Code of Ethics:

Steben & Company has adopted a code of ethics pursuant to the requirements of the Investment Advisers Act of 1940, as amended, and the rules adopted there under. Pursuant to Steben & Company’s code, Firm personnel are subject to general ethical conduct and fiduciary requirements, as well as to monitoring of their personal trading activities involving securities. As of the date of this Brochure, there have been no violations of Steben & Company’s code.

9. Brokerage Practices:

Steben & Company has engaged two investment advisory firms to carry out the day-to-day management of the cash and excess margin assets of the Funds. These advisory firms are subject to oversight by Steben & Company, and are authorized to select brokers and market maker through (or with) with which to effect transactions in securities for the Funds. In selecting brokers for trades involving the Funds, neither cash management firm considers client referrals or receives so-called “soft dollar” benefits.

10. Review of Accounts:

Steben & Company reviews each Fund on a daily basis, and assists in providing monthly net asset values per unit for the purpose of effecting purchase and redemption transactions. As

part of this review process, Steben & Company confirms the activities of each Fund's cash management firms and reviews their trading and portfolio management results.

11. Client Referrals:

Steben & Company does not currently pay compensation to other firms or individuals for providing or otherwise referring clients to the Firm.

12. Custody:

The assets of each Fund are held at one of the Fund's futures commission merchants or with its cash assets custodian, J.P. Morgan Chase Bank, N.A. Investors in each Fund receive monthly statements from the Fund regarding their investment, and receive audited financial statements from the Fund on an annual basis.

13. Investment Discretion:

Steben & Company has investment discretion over the assets of each of the Funds. It has in turn provided limited discretionary authority to each cash management firm to allow the firm to invest the cash assets of each Fund entrusted to its management. To assist in this process, Steben & Company has created cash management guidelines to be followed by each such firm in carrying out its function.

14. Voting of Securities:

Securities acquired and held by the Funds for cash management purposes do not generally have voting rights. If and to the extent that any security acquired by a Fund has voting rights appurtenant thereto, the applicable cash management firm(s) will vote the security(s) in accordance with its proxy voting policies. Investors may obtain a copy of each cash management firm's proxy voting policies by sending a request by email to Steben & Company in care of [info@steben.com](mailto:info@steben.com), or by calling the Firm's Legal and Compliance Department (240 631 7600).

15. Financial Information:

Steben & Company does not require pre-payment of fees of any kind, and as a result is not required to provide a balance sheet with this Brochure. Investors in the Funds receive monthly and annual financial statements for the Funds, and Steben & Company files a summary financial schedule with each Fund's annual report on Form 10-K. Interested persons may review the Fund's SEC disclosure documents by going to [www.sec.gov](http://www.sec.gov).

16. Other:

Steben & Company is registered as an investment adviser with the SEC, and is not registered as an investment adviser with any state or other jurisdiction. A copy of Steben & Company's registration statement can be found by going to [www.sec.gov](http://www.sec.gov). Registration with the SEC does not imply that the SEC has approved Steben & Company's registration or has otherwise endorsed or passed upon Steben & Company's investment practices.

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