

**Lebenthal Financial Services, Inc. – Business Continuity Plan**  
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This “Business Continuity Plan” has been created to meet the requirements described in FINRA Rule 4370. This Business Continuity Plan is reasonably designed to enable our firm to meet its obligations to customers in the event of a Significant Business Disruption.

Authorized Approval Signature: \_\_\_\_\_  
Printed Name & Title: Michael Hartzman, President

Date: \_\_\_\_\_

This Plan is effective from the date approved until the date of its authorized revision, update or replacement (see below).

Date this Plan was no longer effective (date of revision, update or replacement): \_\_\_\_\_

Recordkeeping: Discard after \_\_\_\_\_ (date three years from termination of use).

## **Introduction**

FINRA Rule 4370 requires each member to create and maintain a Business Continuity Plan (BCP) that identifies procedures relating to an emergency or Significant Business Disruption (SBD) that are “reasonably designed to enable the member to meet its existing obligations to its customers.” In addition, the plan must address the firm’s existing relationships with other members and counter-parties. This plan must be promptly made available to the FINRA staff upon request.

Rules 4370(b) requires that each member review its plan at least annually to determine if any changes are needed and update its plan more frequently in the event of any material change to its operations, structure, business or location.

The plan should reflect the firm’s business and operations. Therefore, the requirements of the plan, as identified in Rule 4370, are flexible and should be tailored to the firm’s size and needs.

However, at a minimum, Lebenthal Financial Services, Inc.’s plan must address the following areas:

- Data back-up and recovery (hard copy and electronic);
- All mission critical systems;
- Financial and operational assessments;
- Alternate communications between customers and the member;
- Alternate communications between the member and its employees;
- Alternate physical location of employees;
- Critical business constituents, banks, and counter-party impact;
- Regulatory reporting;
- Communications with regulators; and
- How the member will assure customers’ prompt access to their funds and securities in the event that the member determines that it is unable to continue its business.

Each firm is required to only address the elements applicable to its business, but the plan must contain an explanation if any element above is not included.

Rule 4370 requires each member to designate two individuals as emergency contacts that FINRA may contact in the event of a significant business disruption. Each contact must be a registered principal or member of senior management. However,

- If the member has only one principal but has other employees, the second contact should be another firm employee, or
- If the firm has only one principal and no other employees, the second contact may be someone who has knowledge of the firm’s business, such as an accountant, attorney, etc.

Rule 4370 also requires that each member enter this information into FINRA’s Contact System (FCS) and that required changes are made promptly.

## **1. Emergency Contact Persons**

Lebenthal Financial Services, Inc. has designated the following individuals to act as contact persons for the firm as required under Rule 4370:

### **Primary Contact**

Name, Title: Randi Mason, CCO  
Address: 500 N. Broadway, Suite 238, Jericho, NY 11753  
Telephone Number: 518-349-5555 Cell 516-353-1352  
Fax Number: 518-349-7471  
E-mail Address: randi@Lebenthal.com

### **Secondary Contact:**

Name, Title: Michael Hartzman, President  
Address: 500 N. Broadway, Suite 238, Jericho, NY 11753  
Telephone Number: 516-349-5555 cell 516-521-7895  
Fax Number: 516-349-7471  
E-mail Address: michael@Lebenthal.com

These contacts will be reported through FINRA's Contact System. This system may be accessed directly at [https://regfiling.finra.org/contacts/ncs\\_contacts.aspx](https://regfiling.finra.org/contacts/ncs_contacts.aspx) or through the Firm Gateway at [www.finra.org/firmgateway](http://www.finra.org/firmgateway).and must be updated in the event of a material change. In addition, Lebenthal Financial Services, Inc.'s Executive Representative or his/her written designee must review and update this information, if necessary, within 17 business days of the end of the calendar year. The Executive Representative or his/her designee will also ensure that contact information is updated promptly if changes occur at any time during the year.

### **Executive Representative:**

Lebenthal Financial Services, Inc.'s Executive Representative is Randi Mason.

### **Disaster Recovery Coordinator/Team:**

The Company has designated Randi Mason, CCO, as the "Disaster Recovery Coordinator". In her absence, Michael Hartzman, President, will assume her responsibilities.

The "Disaster Recovery Coordinator" has the responsibility to make an immediate preliminary assessment of the nature and extent of the disruption by assessing the following: electricity supply; condition of computer network/phones; damage to the building; HVAC in extreme weather; and other hazards.

If the Coordinator determines that personnel should evacuate the affected location(s), he/she must make an announcement to all personnel as to appropriate procedures. The announcement may be given via personal contact, e-mail, intercom or other methods as appropriate given the

systems available; the size and location of the staff; and the size of the office or building. This announcement should be short and concise, should calmly identify the situation and should provide instructions to employees on how to respond. This announcement should be repeated as often as necessary to avoid confusion and to ensure all employees are aware of the situation. After ensuring the physical safety of Company personnel, the must then implement this BCP.

If the situation does not merit evacuation, steps should be taken to alert designated of necessary actions to facilitate ongoing operations in the face of limited disruption. In this case, the Coordinator will determine which, if any, procedures in this BCP should be implemented.

In the event, the SBD has directly affected other areas of the building but has not directly impacted the Company's office, the Coordinator will contact building security or emergency personnel for instructions on how the Company should respond and proceed accordingly.

## **2. Firm Policy**

Lebenthal Financial Services, Inc.'s policy is to respond to a Significant Business Disruption (SBD) by safeguarding employees' lives and firm property, making a financial and operational assessment, quickly recovering and resuming operations, protecting all of the firm's books and records, and allowing its customers to transact business. In the event that it is determined the firm is unable to continue its business, the firm will assure customers prompt access to their funds and securities.

### **Significant Business Disruptions (SBDs):**

Lebenthal Financial Services, Inc.'s plan anticipates two kinds of SBDs, internal and external. Internal SBDs affect only the Company's ability to communicate and do business, such as a fire or loss of electrical power in the office or building.

External SBDs prevent the operation of the securities markets or a number of firms, such as a terrorist attack, a natural disaster, or another event that causes a wide-scale, regional disruption in essential services. The Company's response to an external SBD will rely more heavily on other organizations and systems, especially on the capabilities of the clearing firm, the product sponsors or placement issuers, federal emergency authorities, local officials and utility companies.

### **Approval and Execution Authority:**

Michael Hartzman, President, a registered principal, is responsible for approving the plan and for conducting the required annual review.

Randi Mason, CCO, has the authority to execute this BCP.

### **Plan Location and Access:**

Lebenthal Financial Services, Inc. will maintain copies of its BCP plan, a record of the firm's annual reviews, and the changes that have been made to the BCP for inspection by regulators. A hard copy of the Company's Plan is located in its main business location and may be accessed by contacting Randi Mason at 516-349-5555 or randi@Lebenthal.com.

An electronic copy of the Company’s plan is located internally on the Company’s server. A back-up copy of this electronic file is maintained at Foreside Financial in Londonderry, NH.

A copy of the BCP will be provided to the local FINRA Office located in Jericho, NY upon request.

### **3. Business Description**

Lebenthal Financial Services, Inc. conducts business in Mutual Funds, Annuities, Equities, Fixed Income Securities, and Options. The Company is an introducing firm and does not perform any type of clearing function for itself or others. Furthermore, the Company does not hold customer funds or securities. Lebenthal Financial Services, Inc. accepts and enters orders. All transactions are sent to the clearing firm, which executes our orders, compares them, allocates them, clears and settles them. The Company’s clearing firm also maintains our customers’ accounts, can grant customers access to them, and delivers funds and securities. The Company services only retail and small business customers and does not engage in any private placements.

The Company’s clearing firm is Raymond James & Associates, Inc., 880 Carillon Parkway, St. Petersburg, FL 33716, 727-567-1000, and our contact person at that clearing firm is Michael Randall, phone (727) 567-3992, [Mike.Randall@RaymondJames.com](mailto:Mike.Randall@RaymondJames.com).

Lebenthal Financial Services, Inc. may also conduct business on a subscription basis in mutual funds, variable insurance products, and unit investment trusts. The Company does not hold customer funds, securities or customer accounts. Lebenthal Financial Services, Inc. accepts applications from customers for the purchase of these products and sends them directly to the product sponsor for execution and settlement. The product sponsor maintains all the customer accounts and delivers funds and securities upon the customer’s request.

### **4. Office Locations**

The Company or its registered personnel currently operate from the following locations:

<b>Type of Location, Registered or Unregistered</b>	<b>Address and Main Phone Number</b>	<b>Located in a Personal Residence? (Y or N)</b>	<b>Means of Transportation Employees Use to Reach Office</b>	<b>Mission Critical Systems Taking Place at Office</b>
Home Office, registered	500 N. Broadway, Suite 238, Jericho, NY 11753	No	Car	Order taking, entry, customer account maintenance and customer service
Non-Supervisory Branch	68 South Service Road, Suite 100, Melville, NY 11747 631-367-6116	No	Car	Sales
Non-Supervisory	200 Parkway Drive	No	Car	Sales, Investment

Branch	South, Hauppauge, NY 516-785-1800			Advisory Services
Non-Supervisory Branch	325 Broadway, Suite 204, New York, NY 10007 212-953-2900	No	Car, Subway, Foot, Train, Bus	Sales
Non-registered Location	48-19 43 <sup>rd</sup> Avenue, Sunnyside, NY 11104	No	Car	Sales
Non-registered Location	1 Fox Path, Coram, NY 117 Fox Path, Coram, NY 11727	Yes	Car	Sales
Non-registered Location for FinOps	100 Quentin Roosevelt Blvd., Garden City, NY 11530	Yes	Car	FinOp Services
Non-registered Location-David Walker	5838 South Pagosa Way, Centennial, CO 80015	Yes	Car	Sales
Non-registered Location- Christopher Delzio	5411 Grove Manor, Lady Lake, FL 32159	Yes	Car	Sales
Non-registered Location- Andrew Grillo	4201 Victoria Drive, Mt. Kisco, NY 10549	Yes	Car	Recruiting
Non-registered Location- Brad Gute	5 Glen Avenue, Roslyn, NY 11576	Yes	Car	Sales
Non-registered Location- Jordan Kimmel	39 Old Farmstead Road, Chester, NJ 07930	Yes	Car	Portfolio Manager
Non-registered Location-Robert Nyilas	39 Alvin Drive, Norwalk, CT 06850	Yes	Car	Sales
Non-registered Location-Mark Reinerth	440 Montiello Ave., Site 1800, Norfolk, VA 23510	No	Car	Sales
Non-registered Location- Paul Steck	36 Manchester Street, Westbury, NY 11590	Yes	Car	Sales
Non-registered Location-James Wagoner	29 Cliff Avenue, Darien, CT 06820	Yes	Car	Sales

**Alternative Physical Location(s) of Employees:**

In accordance with Rule 4370 each member must designate a location at which business will be conducted in the event the primary office of the Company must be evacuated. In accordance with this requirement, Lebenthal Financial Services, Inc. will move critical members of its staff from affected offices to the Company's closest unaffected office locations. If none of the Company's other office locations is available to receive staff, they will relocate to the personal residences of each Principal as indicated on their U4s.

## **5. Customers' Access to Funds and Securities**

Lebenthal Financial Services, Inc. does not maintain custody of customers' funds or securities. Customer accounts are maintained at our clearing firm, Raymond James & Associates, Inc.

In the event of an SBD:

1. If telephone service is available, our registered persons will:
  - a. take customer orders or instructions and contact our clearing firm, the product sponsor or offeror on their behalf, or
  - b. provide information to the customer with information on contacting the clearing firm, product sponsor or offeror; and
2. If Web access is available, the firm will post on our Web site that customers may access their funds and securities by contacting our clearing firm.

If SIPC determines that the Company is unable to meet its obligations to its customers or if the Company's liabilities exceed its assets in violation of Securities Exchange Act Rule 15c3-1, SIPC may seek to appoint a trustee to disburse the Company's assets to its customers. Lebenthal Financial Services, Inc. will assist SIPC and the trustee by providing applicable books and records identifying customer accounts subject to SIPC regulation.

## **6. Data Back-Up and Recovery (Hard Copy and Electronic)**

Lebenthal Financial Services, Inc. maintains its primary books and records in hard copy format at 500 N. Broadway, Suite 238, Jericho, NY 11753. Randi Mason, CCO, is responsible for the maintenance of these books and records.

Lebenthal Financial Services maintains the following document types and forms that are not transmitted to the clearing firm, product sponsor or issuer: new account forms, customer information.

### **Back-up of Paper Records:**

The Company does not keep a back up copy of its hard copy books and records because the Company does not hold customer funds or securities and customer investments are maintained directly by the clearing firm, respective fund or offeror. Therefore, an internal or external SBD affecting Company offices should not pose a threat to customer records or financial holdings. While the Company may lose access to some or all FINRA- or SEC-required records in an external SBD, or may permanently lose some or all such records in an internal SBD (such as a fire), we believe our customers would not suffer as a result.

### **Back-up of electronic records:**

The firm backs up its electronic records weekly to Advanced Vision Technology Group at three locations in the United States.

In the event that electronic records are lost, the Company will either physically recover the storage media or electronically recover data from its back-up site, or, if the Company's primary site is inoperable, continue operations from its back-up site or an alternate location.

## **7. Financial and Operational Assessments**

### **Operational Risk:**

In the event of a SBD, Lebenthal Financial Services, Inc. will immediately identify any methods available that will permit personnel to communicate with customers, other employees, critical business constituents, critical banks, critical counter-parties, and regulators.

Although the effects of an SBD will determine the means of alternative communication, the communications options the Company may employ will include telephone voice mail, secure e-mail. In addition, Lebenthal Financial Services will retrieve key activity records as described in the section above, Data Back-Up and Recovery (Hard Copy and Electronic).

### **Financial and Credit Risk:**

In the event of a SBD, Lebenthal Financial Services, Inc.'s FINOP will determine the value and liquidity of its investments and other assets to evaluate the Company's ability to continue to fund its operations and remain in capital compliance.

Lebenthal Financial Services, Inc. will contact its clearing firm, critical banks, and investors to apprise them of the Company's financial status. If the Company determines that it may be unable to meet its obligations to those counter-parties or otherwise continue to fund its operations, Lebenthal Financial Services, Inc. will request additional financing from our bank or other credit sources to fulfill its obligations to our customers and clients. If Lebenthal Financial Services cannot remedy a capital deficiency, the FINOP will file appropriate notices with applicable regulators and immediately take appropriate steps, including the suspension of certain business activities, contacting SIPC, temporary lay-off of non-essential personnel.

In the event of a suspension or termination of the Company's business, the Company will attempt to notify customers regarding the situation and provide them with instructions for accessing their funds or securities, if applicable, for verifying transactions in process or for conducting future business. Notification will be a form allowed based on the circumstances permitted by regulatory authorities and may include telephone calls, letters or a posting on the Company's website.

## **8. Mission Critical Systems**

### **Internal Mission Critical Systems**

Lebenthal Financial Services, Inc.'s "mission critical systems" are those that ensure prompt and accurate processing of securities transactions, including order taking, entry, execution, comparison, allocation, clearance and settlement of securities transactions, the maintenance of customer accounts, access to customer accounts, and the delivery of funds and securities. More



specifically, these systems include: introducing clients to Raymond James & Associates, Inc. for execution, clearing and custodial services.

The Company has primary responsibility for establishing and maintaining business relationships with customers and has sole responsibility for the Company's mission critical functions of order taking and entry.

### **Order Taking**

Currently, the Company receives orders from customers via telephone and in person. During an SBD, we will continue to take orders through any of these methods that are available and reliable.

The Company will inform its customers what alternatives they have to send their orders to us in the event traditional methods are interrupted. Customers will be informed of alternatives by disclosure information provided when a new business relationship is established and by calls from personal cell phones, if phone services are affected, through messages via email or posted on the Company's website or other means available. If necessary, the Company will advise its customers to place orders directly with our clearing firm.

### **Order Entry/Submission**

Currently, Lebenthal Financial Services enters orders by recording them on paper and/or electronically and sending them to our clearing firm, product sponsor or issuer electronically, by telephone, by facsimile or by mail.

In the event of an internal SBD, the Company will send orders to its clearing firm, product sponsor or issuer by the fastest alternative means available, which may include alternative telephone facilities, including cell phones and external e-mail connections.

In addition, during an internal SBD, the Company may refer customers directly to the clearing firm for placing orders.

In the event of an external SBD, the Company will maintain the order in electronic or paper format, and deliver the order to the clearing firm, product sponsor or issuer by the fastest means available when it resumes operations.

### **Order Execution**

The Company does not execute orders. All orders are executed through either through the Company's clearing firm or on a subscription basis by the product sponsor or issuer. See below for information on the clearing firm's mission critical systems.

### **Mission Critical Systems Provided by Our Clearing Firm**

The Company's clearing firm provides, through contract, the execution, comparison, allocation, clearance and settlement of securities transactions, the maintenance of customer accounts, access to customer accounts, and the delivery of funds and securities.

Lebenthal Financial Services, Inc.'s clearing agreement, or addendum thereto, provides that the clearing firm will maintain a business continuity plan and the capacity to execute that plan.

Raymond James & Associates, Inc. represents the following:

1. It will advise the Company of any material changes to its plan that might affect Lebenthal Financial Services, Inc.'s ability to maintain its business.
2. In the event the Company's clearing firm executes its plan, it represents that it will notify the Company of such execution and provide the Company equal access to services as its other customers.
3. If Raymond James & Associates, Inc. determines that it has not or cannot put its plan in place quickly enough to meet Lebenthal Financial Services, Inc.'s needs, or is otherwise unable to provide access to such services Raymond James & Associates, Inc. represents that it will assist the Company in seeking services from an alternative source.
4. Raymond James & Associates, Inc. backs up the Company's records at a remote, out of region site and it operates a back-up operating facility in a geographically separate area with the capability to conduct the same volume of business as its primary site.

In addition, the Company's clearing firm has also confirmed the effectiveness of its back-up arrangements to recover from a wide scale disruption by testing, and it has confirmed that it tests its back-up arrangements twice a year.

Recovery-time objectives provide concrete goals to plan for and test against. They are not, however, hard and fast deadlines that must be met in every emergency situation, and various external factors surrounding a disruption, such as time of day, scope of disruption, and status of critical infrastructure—particularly telecommunications—can affect actual recovery times.

Recovery refers to the restoration of clearing and settlement activities after a wide-scale disruption; resumption refers to the capacity to accept and process new transactions and payments after a wide-scale disruption. Raymond James & Associates, Inc. has the following SBD recovery time and resumption objectives: recovery time period as described in attached document and resumption time within the same business day.

## **9. Alternate Communications Between the Firm and Customers, Employees, and Regulators**

### **Customers**

The Company currently communicates with our customers using the telephone, U.S. mail, and in person visits at our firm or at the other's location.

In the event of a SBD, we will assess which means of communication are still available to us, and use the means closest in speed and form (written or oral) to the means that we have used in the past to communicate with the other party. For example, if we have communicated with a party by e-mail but the Internet is unavailable, we will call them on the telephone and follow up where a record is needed with paper copy in the U.S. mail.

## **Employees**

The Company currently communicates with its employees using the telephone and in person.

In the event of a SBD, we will assess which means of communication are still available to us and use the means closest in speed and form (written or oral) to the means that we have used in the past to communicate with the other party.

The Company employs only 21 employees who are located within close proximity to each other. Employees will be notified directly by the Disaster Recovery Coordinator, or his/her designee, as to events and the manner in which they should proceed.

## **Regulators**

The Company is currently a member of FINRA and is registered with the SEC.

The Company is registered to conduct business in the following states: Alabama, Arizona, California, Colorado, Connecticut, District of Columbia, Florida, Georgia, Hawaii, Illinois, Indiana, Kansas, Kentucky, Maine, Maryland, Massachusetts, Missouri, Nevada, New Jersey, New York, North Carolina, Ohio, Oklahoma, Oregon, Pennsylvania, Puerto Rico, Rhode Island, South Carolina, Texas, Vermont, Virginia, and Washington.

Lebenthal Financial Services, Inc. communicates with applicable regulators using the telephone, e-mail, fax, U.S. mail, and in person.

In the event of a SBD, we will assess which means of communication are still available to us and use the means closest in speed and form (written or oral) to the means that we have used in the past to communicate with the other party.

## **10. Critical Business Constituents, Banks, and Counter-Parties**

### **Business constituents**

Lebenthal Financial Services, Inc. has contacted our critical business constituents (businesses with which the Company has an ongoing commercial relationship in support of its operating activities, such as vendors providing critical services), and determined the extent to which the Company can continue its business relationship with these businesses in light of the internal or external SBD. The Company will quickly establish alternative arrangements if a business constituent can no longer provide the needed goods or services when we need them because of a SBD to them or our firm.

<b>Business Constituent</b>	<b>Services Provided</b>	<b>Location of Vendor</b>	<b>Phone Number</b>
Foreside Financial Group	Broker/Dealer Compliance Consulting	12 Parmenter Road, Londonderry, NH 03053	(603) 434-3594
Advanced Vision Technology Group	Electronic file storage	Various locations	
Global Relay	Email and Twitter Message Storage	Global Relay Communications Inc. 220 Cambie Street, 2 <sup>nd</sup> Floor Vancouver, BC V6B 2M9	(604) 484-6630

## **Banks**

Lebenthal Financial Services, Inc. has contacted its banks and lenders to determine if they can continue to provide the financing that the Company may need in light of the internal or external SBD. The Company's accounts are currently with the following institutions:

<b>Types of account (i.e. checking, savings, PAIB, escrow)</b>	<b>Name of Financial Institution</b>	<b>Address of Financial Institution</b>	<b>Telephone Number</b>	<b>Contact Name</b>
Checking	CitiBank	100 Sunnyside Blvd., Plainview, NY 11803	(516) 346-5276	

If our banks and other lenders are unable to provide the financing, we will seek alternative financing immediately.

## **Counter-Parties**

Lebenthal Financial Services, Inc. has contacted our critical counter-parties, such as other broker-dealers or institutional customers, to determine if we will be able to carry out our transactions with them in light of the internal or external SBD. Where the transactions cannot be completed, we will work with our clearing firm or contact those counter-parties directly to make alternative arrangements to complete those transactions as soon as possible.

## **11. Regulatory Reporting**

Lebenthal Financial Services, Inc. is subject to regulation by FINRA and SEC, as well as various state and other securities regulators (see list of states in Part 10 – Regulators).

The Company currently files reports with our regulators using paper copies in the U.S. mail, and electronically using fax, e-mail, and the Internet. In the event of a SBD, we will check with the SEC, FINRA, and other regulators to determine which means of filing are still available to us and use the means closest in speed and form (written or oral) to our previous filing method. In the event that we cannot contact our regulators, we will continue to file required reports using the communication means available to us.

The Company's current regulators can be reached as follows:

FINRA Jericho Office:

Address: Two Jericho Plaza, Suite 307, Jericho, NY 11753-1658

Phone: 516-827-6100

Risk Monitoring Analyst: Emmanuella Pierre

E-mail: [Emmanuella.Pierre@finra.org](mailto:Emmanuella.Pierre@finra.org)

SEC New York Region:

Address: 200 Vesey Street, Suite 400, New York, NY 10281-1022

Phone: 212-336-1100

E-mail: [newyork@sec.gov](mailto:newyork@sec.gov)

State of NY:

Address: 28 Liberty Street, 15<sup>th</sup> Floor, New York, NY 10005

Phone: 212-416-8222

Other state regulator information can be found by accessing the North American Securities Administrators Association website: <https://www.nasaa.org/contact-your-regulator/>.

## **12. Disclosure of Business Continuity Plan**

The Company will disclose in writing a summary of our BCP to customers at account opening or at the time a business relationship is established. The Company will notify customers in writing when material changes are made to the Plan that may affect their business relationship with the Company. The Company will also mail it to customers upon request.

The summary addresses the possibility of a future SBD and how we plan to respond to events of varying scope. In addressing the events of varying scope, the summary:

1. Provides specific scenarios of varying severity (e.g., a firm-only business disruption, a disruption to a single building, a disruption to a business district, a city-wide business disruption, and a regional disruption);
2. States whether we plan to continue business during that scenario and, if so, our planned recovery time; and
3. Provide general information on our intended response.

Our summary also discloses the existence of back-up facilities and arrangements. A copy of the Company's disclosure statement is included at the back of this Plan.

## **13. Updates and Annual Review**

The Company will update this plan whenever there is a material change to its operations, structure, business or location or to those of the clearing firm.

The Company's BCP will be reviewed and modified, if necessary, at least annually, but no later than within 12 months of the date on which this Plan was put into effect or previously reviewed,

to take into account any changes in the Company's operations, structure, business, or location or those of our clearing firm.

## Customer Disclosure Statement

### Lebenthal Financial Services, Inc.

Lebenthal Financial Services, Inc. plans to quickly recover and resume business operations after a significant business disruption (SBD) and respond by safeguarding our employees and property, making a financial and operational assessment, protecting the firm's books and records, and allowing our customers to transact business. In short, our company's business continuity plan (BCP) is designed to permit us to resume operations as quickly as possible, given the scope and severity of the SBD.

The BCP addresses: data back up and recovery; all mission critical systems; financial and operational assessments; alternative communications with customers, employees, and regulators; alternate physical location of employees; critical supplier, contractor, bank and counter-party impact; regulatory reporting; and assuring our customers prompt access to their funds and securities if we are unable to continue our business.

Our clearing firm, Raymond James & Associates, Inc., backs up our important records in a geographically separate area. While every emergency situation poses unique problems based on external factors, such as time of day and the severity of the disruption, we have been advised by our clearing firm that its objective is to restore its own operations and be able to complete existing transactions and accept new transactions and payments within the same business day. Your orders and requests for funds and securities could be delayed during this period.

In addition, the product sponsor or issuer maintains all records related to your investments and account holdings and backs up important records in accordance with their business continuity plan. For more information on their contingency plan, please contact the sponsor or issuer directly at the telephone number provided on your statements or offering documents or through their website.

**Significant Business Disruptions:** The Company's plan takes into account two kinds Significant Business Disruptions, internal and external. Internal SBDs affect only the Company's ability to communicate and do business, such as a fire or loss of electrical power in the office or building.

External SBDs prevent the operation of the securities markets or a number of firms, such as a terrorist attack, a natural disaster, or another event that causes a wide-scale, regional disruption in essential services.

**Internal SBDs:** In the event of a disruption in the Company's business operations due to an internal SBD, the Company will attempt to continue to conduct business as usual by utilizing alternative communication methods (if available), such as the Internet, cell phones, etc., or by moving its operations to an alternative location.

If personnel or operations must be moved to an alternate location, the Company anticipates that it will resume regular operations with 4 hours.

**External SBDs:** In the event of a disruption in the Company's business operations due to an external SBD, the Company will attempt to continue to conduct business as usual by moving its operations to an alternative location outside the effected area, if possible, or by providing customers with alternative communication arrangements, as indicated below, to conduct business or to access their funds and securities.

The Company will attempt to resume business within 24-48 hours and to keep its customers informed regarding relevant events to the best of its ability based on the circumstances.

In all cases, the Company will resume normal business operations as soon as it is able to do so, based on the type and the extent of the disrupting event.

If the significant business disruption is so severe that it prevents us from remaining in business, we will assure our customer's prompt access to their funds and securities.

**Communications:** In the event you are unable to reach the Company at our main number, please proceed as follows:

1. Contact the Company at the following alternate telephone number: 516-349-5555.
2. Access the Company's websites at [LebenthalFinancial.com](http://LebenthalFinancial.com) and [Lebenthal.com](http://Lebenthal.com).
3. Contact the clearing firm directly at one of the following telephone numbers to process transactions or for information on your holdings: 727-567-1000.
4. Contact the product sponsor directly at the number listed on your most recent statement.
5. Access the clearing firm, product sponsor or issuer website for more information on contacting this entity and their business continuity plans. The website address can generally be found on your statement or offering documents.
6. Contact FINRA's District office at the following telephone number for more information on the company's status and additional instructions: 516-827-6100.

**Contact information:** Any questions regarding the Company's Business Continuity Plans should be addressed to: Randi Mason, 500 N. Broadway, Suite 238, Jericho, NY 11753, 516-349-5555.