

# **Lebenthal Global Advisors, LLC**

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## ***LEBENTHAL ADVISORY WRAP FEE PROGRAM***

### ***Wrap Fee Program Brochure***

**May 24, 2019**

This brochure provides information about the qualifications and business practices of Lebenthal Global Advisors, LLC (“LGA”). If you have any questions about the contents of this brochure, please contact us at 516-785-1800 or [Tom@bristol-financial.com](mailto:Tom@bristol-financial.com). The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission (“SEC”) or by any state securities authority.

LGA is an investment adviser registered with the SEC. Registration of an investment adviser does not imply any level of skill or training. The oral and written communications of an investment adviser are intended to provide you with information to assist in your determination as to whether to retain the services of that investment adviser.

Additional information about LGA is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

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## Item 2. Material Changes

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Lebenthal Global Advisors, LLC (“LGA, Adviser, we, our, ours”) will provide our disclosure brochure (“brochure”) to you when we enter into an advisory agreement with you. Our brochure will be updated no less than annually. Within 120 days of our fiscal year end we will deliver a summary of material changes which have been made to our brochure since its last annual update. This summary will include information about how you may obtain an updated brochure at no charge, and it will include the date of the last annual update. We will provide updated disclosure information about material changes more frequently as needed.

LGA has made the following material changes since our last brochure dated April 22, 2019: Added information regarding the services LGA’s affiliate, Diversified Private Wealth Advisors, LLC, provides.

A copy of our current brochure may be requested by contacting Thomas Katovitz at (516)785-1800 or Tom@bristol-financial.com. We will provide you with a copy of our current brochure at any time without charge.

Information about your Advisory Representative may be found in the supplements to our brochure.

*Lebenthal Global Advisors,  
LLC CRD Number  
283303*

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## **Item 4. Services, Fees and Compensation**

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Lebenthal Global Advisors, LLC (“LGA, Adviser, we, our, ours”), located in Hauppauge, New York, is a Limited Liability Company organized under the laws of the State of New York. Dominick Tavella is the President and principal owner. Michael Hartzman is the Vice President. LGA is a federally registered investment adviser.

We offer investment advisory services through a network of independent Investment Adviser Representatives (“IARs”, “Advisory Representatives”). Our Advisory Representatives work with you to identify your investment goals, objectives, and risk tolerances to structure an investment account and an ongoing investment strategy that is appropriate for you.

### **The Wrap Fee Program Services**

The Lebenthal Advisory Wrap Fee Program (“Program”) offers individualized portfolio management, asset allocation, portfolio monitoring, and consolidated reporting. Portfolios may include mutual funds, exchange traded products (“ETPs”), stocks, bonds, options, and alternative investments such as limited partnerships and real estate investment trusts or third-party investment managers.

Your portfolio (“account” or “investment account”) and the investment strategies utilized are determined based upon your specific individual investment objectives, goals and risk tolerances. Our Advisory Representatives periodically adjust your account (a process referred to as “rebalancing”) to help ensure that your investment account remains consistent with your objectives, goals, and risk tolerances.

Our Advisory Representatives rely on you to notify them of any changes in your objectives, goals and risk tolerances, as well as any other material changes in your personal circumstances (such as your employment, marital status, financial condition, etc.). These changes may prompt changes in your investment account and the investment strategies employed.

We may recommend or select a third-party investment manager to provide investment management services for all or a portion of your investment portfolio. Generally, we will recommend our affiliate Diversified Private Wealth Advisors, Inc. (“DPWA”). Our affiliation with DPWA is further disclosed in the section entitled “*Other Financial Industry Activities and Affiliations*”.

To assist you in the selection of a particular third-party investment manager, we will use the information you have provided about your investment objectives, goals, and

risk tolerances, as well as other relevant information, to identify a third-party investment manager(s) whose investment strategies appear appropriate for you.

Some of the other relevant information considered in recommending a third-party investment manager include (but are not limited to):

- your preference for certain types of investments or investment strategies;
- your investment time horizon;
- the size and composition of your investment account;
- your tax considerations;
- your Advisory Representative's prior experience with and preferences for particular investment managers;
- the fees charged by the investment manager; and
- the experience and capabilities of the investment manager.

We will provide the respective third-party investment manager's disclosure brochure which will more fully describe the recommended program.

We offer these services on a discretionary basis. Through discussions, interviews and questionnaires we will assist you in determining your investment objectives. We will recommend managers, based on your objectives, risk tolerance, liquidity needs, tax considerations and any other issues related to your financial situation.

We will meet with you no less than annually to discuss the performance of your investments and update your financial information.

You should notify us promptly if there are any changes in your financial situation or investment objectives or if you wish to impose any reasonable restrictions upon the management of your account.

Our Advisory Representatives may manage your investment account on either a discretionary basis (meaning that you authorize your Advisory Representative to make specific investment decisions on your behalf) or non-discretionary basis (meaning that

your Advisory Representative must obtain your specific prior approval before a transaction can be effected for your investment account).

Whether your Advisory Representative is authorized to exercise discretion with respect to your investment account is your choice. When you establish an advisory relationship with us, we will ask that you advise us in writing how you would like your Advisory Representative to handle your account.

The scope of the discretionary authority that you may grant to one of our Advisory Representatives is limited to selecting specific investments or third-party investment

managers for your account and deciding how to allocate your account assets among those investments. Your Advisory Representative may decide if and when to buy, hold, or sell those investments. If your Advisory Representative selects a third-party investment manager to manage your account, the third-party investment manager will have discretionary authority to make investment decisions for your account. Once you have granted discretionary authority to your Advisory Representative, it is effective until you change it or revoke it in writing.

Our Advisory Representatives are registered representatives of Lebenthal Financial Services, Inc. (“LFS” formerly known as Bristol Financial Services, Inc.) a registered broker/dealer affiliated with LGA through common control and ownership.

### **Execution of Trades**

Transactions for the Account will be executed through LFS, a broker-dealer affiliated with LGA or Schwab Advisor Services division of Charles Schwab & Co., Inc. (“Schwab”). The specific broker-dealer and custodian will be named in the Program agreement. In certain cases, clients may direct that transactions for the client’s Program Account be executed through an unaffiliated broker-dealer named by the client in the Program Agreement.

### **Other Assets**

In certain limited circumstances, LFS may permit assets that are not being managed under the Program to be held in the same brokerage account as the Program assets. These assets are referred to as “non-Program assets.” LGA will not provide discretionary management of the non-Program assets, and the assets will not be considered when LGA manages the Program Assets. You will typically receive consulting services in connection with the non-Program assets from your Advisory Representative and pay fees to them based on the value of the non-Program assets.

### **Custody**

An unaffiliated entity acts as custodian for Program Accounts. The custodian is named in the client’s Program Agreement. LGA will recommend LFS as introducing broker-dealer clearing through Raymond James or Schwab to act as custodian for Program Accounts although we may agree to employ the services of one or more other custodians.

LGA is deemed to have custody when you authorize us to deduct our advisory fees directly from your accounts. At least quarterly, you will receive statements from your account custodian. The statements will show the advisory fees paid to us. Your custodian does not verify the accuracy of fee calculations so please review the fees carefully.

You should also confirm that the transactions in your account are consistent with the investment goals and the objectives for your account.

LGA is deemed to have custody when you authorize us via standing letters of instruction to direct funds to third-parties from your custodial accounts. In connection with standing letters of instruction you must provide signed written instruction to the custodian to direct transfers to a third party, which you may instruct the custodian to terminate or change at any time. LGA has no authority or ability to designate or change the identity of the third party, the address, or any other information about the third party contained in the client's instruction. Your custodian will verify the instruction with an initial notice, provide you with a transfer of funds notice promptly after each transfer, and an annual notice reconfirming the instruction. LGA or its affiliates may not accept funds in connection with standing letters of instruction, nor may funds be delivered to locations where we or our affiliates conduct business.

Please promptly contact our Chief Compliance Officer, Thomas Katovitz at (516) 785-1800, should you have any questions or concerns regarding your account.

### **Fees and Compensation**

Each account in the Program will generally be charged an asset-based fee ("Program Fee") in advance on a quarterly basis. The Program Fee is comprised of the Advisory Fee and the Platform Fee. The Program Fee will be calculated based on the value of the Program Assets in the account on the last day of the previous quarter, as determined by the account custodian. The Advisory Fee rate or rates used to calculate the Program Fee are subject to negotiation between the Advisory Representative and each client. The Platform Fee is also negotiable. The actual fee rates charged will be set forth in the client's Program Agreement. The Program Fee will be billed quarterly. The Program Fee is based on a flat or tiered schedule as negotiated with the client. For flat fee arrangements the maximum Program Fee is 2.40%. Tiered Program Fees are determined as follows:

<b>Value of Account Assets</b>	<b>Account Size Range</b>	<b>Maximum Annual Program Fee</b>	<b>Maximum Advisory Fee</b>	<b>Platform Fee</b>
Up to	\$100,000	2.40 %	2.00 %	0.40 %
Next \$150,000	\$100,001 - \$250,000	2.35 %	2.00 %	0.35 %
\$Next \$250,000	\$250,001 - \$500,000	2.25 %	2.00 %	0.25 %
Next \$500,000	\$500,001 - \$1,000,000	2.15 %	2.00 %	0.15 %
Next \$4,000,000	\$1,000,001 - \$5,000,000	2.12 %	2.00 %	0.12 %
Assets over \$5,000,000	\$5,000,0001 and up	2.05 %	2.00 %	0.05 %



When using tiered billing, once the value of the Program Assets meets the next tier, the new rate will be applied to all assets above the tier up to the next tier. The tiered schedule is not intended to be a discount program and LGA's compensation could be higher or lower than for a similarly sized account using a flat fee arrangement.

Either party at any time upon written notice may terminate the Program Agreement and a *pro rata* portion of any Program Fee paid by the client in advance will be remitted to the client based on the number of days left in the quarter following receipt of the notice of termination by LGA.

The Program Fee covers the consulting services provided by the Advisory Representative, the portfolio management services provided by LGA and third-party asset managers (if applicable), program administrative services, execution of transactions through the broker-dealer named in the agreement and custodial services (unless otherwise agreed between the custodian and the client). LGA's portion of the Program Fee for portfolio management is up to 2.00%. If there are any non-Program assets in the account, LGA will generally not receive a portion of the Program Fee for portfolio management services with respect to those assets.

LFS receives a portion of the Program Fee for supervision and administrative services, if one of its registered representatives is the Advisory Representative for the Account. If the broker-dealer for the account is LFS, LFS will also receive a portion of the Program Fee for the execution of transactions and generally pays part of its compensation to the custodian. DPWA receives a portion of the Platform Fee for administrative services.

If Client directs LGA to execute transactions through Schwab, LGA will pay the broker-dealer a transaction charge for each trade in the account. The cost of these trades is covered by the Program Fee. The client will not pay separately for each transaction, unless specifically set forth in the client's Program Agreement. Thus, LGA, including its Advisory Representative, will earn more compensation if fewer transactions are executed for the accounts or if transacted through its affiliated broker/dealer. LGA reduces this conflict of interest by managing these accounts in the same way that it manages accounts that execute through LFS.

LGA absorbs certain transaction costs in wrap fee accounts. We have a financial incentive not to place transaction orders in those accounts because doing so increases our transaction costs. Thus, an incentive exists to place trades less frequently in a wrap fee arrangement.

The Program may cost you more or less than purchasing such services separately depending on the frequency of trading in the Program Account, commissions charged at other broker-dealers for similar products, fees charged for like services by other advisers and broker-dealers and other factors.



The Program Fee does not cover:

- Brokerage commissions or other charges resulting from transactions not effected through the broker-dealer named in the client's Program Agreement;
- Any additional custodial services contracted for directly by the client with the custodian;
- Certain costs or charges that may be imported by the broker-dealer or custodian named in the client's Program Agreement or third parties, including costs associated with exchanging foreign currencies, odd-lot differentials, IRA fees, transfer taxes, exchange fees, wire transfer fees, postage fees, and other fees or taxes required by law.

In addition to the Program Fee, each mutual fund or ETP in which a client may invest also bears its own fees and other expenses. The mutual funds available through the Program may be available directly from the funds pursuant to the terms of their prospectuses and without paying the Program Fee and ETPs are available outside of the Program without paying the Program Fee, subject to applicable commissions and/or transaction charges. Further, to the extent that cash used for investment through the Program comes from redemptions of the client's mutual fund or other investments outside of the Program, there may be tax consequences or additional cost from sales charges previously paid and redemption fees incurred. Such redemption fees would be in addition to the Program Fee on those assets.

LFS will receive payments from mutual funds (including money market funds) pursuant to a 12b-1 distribution plan or other such plan as compensation for distribution or administrative services and are distributed from the fund's total assets and will affect the performance of the investments. These funds' advisory, administrative, and 12b-1 fees are described in the funds' prospectuses. Mutual fund share prices and execution costs differ based on share class. The Adviser will review the cost of a fund's share classes in conjunction with execution costs to assure that it meets its fiduciary duty to obtain best execution. The Advisory Representative will receive a portion of these fees received by LFS in his or her capacity as its registered representative in connection with non-Program assets. Thus, the Advisory Representative may have an incentive to recommend LFS as broker-dealer of a client's account.

Additional expenses associated with the specific underlying investment funds such as, redemption fees may apply. Certain mutual funds and mutual fund share classes used in the Program charge a redemption fee if shares are redeemed within a specified period. Clients may incur redemption fees in the event that a sell is executed or model update is implemented. Redemption fees vary by fund and are described in each fund's prospectus.

The Advisory Representative recommending the Program to the client may receive more compensation than if the client participated in other programs offered by LGA or paid separately for investment advice, brokerage, and other services. Thus, the Advisory Representative has a financial incentive to recommend the Program over other programs or services.

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## **Item 5. Account Requirements and Types of Clients**

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LGA does not require a minimum account value in order to establish an advisory relationship.

The following types of clients may participate in the Program: individuals, including high net worth individuals, including small business owners, pension and profit-sharing plans, including the plan participants, trusts, estates and charitable organizations, corporations or other business entities, Taft-Hartley plans, and not-for-profit entities.

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## **Item 6. Portfolio Manager Selection and Evaluation**

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Your Advisory Representative is the portfolio manager for your account in this Program and may appoint a third-party investment manager to provide portfolio management. Please refer to your Advisory Representative's Supplement to this brochure for information about his or her education, business experience, and disciplinary information. Generally, we will recommend our affiliate DPWA to provide third-party investment management services because of its experience and service it provides to LGA or because of the client's past experience with DPWA as their investment adviser. If your Advisory Representative selects DPWA, to provide third-party investment management services to you, DPWA and its owners will receive a portion of the advisory fees you pay to LGA. This presents a conflict of interest because this may create an incentive to recommend DPWA based upon the amount of compensation an LGA affiliate can receive rather than based upon your needs. LGA addresses these conflicts by disclosing this potential conflict to clients to assure that their interests are considered. Information regarding DPWA may be found in its Disclosure Brochure, which is available from your Advisory Representative.

### **Individual Needs of Clients and Restrictions**

As described in "*Services, Fees and Compensation*" above, clients inform their Advisory Representative of their investment objectives, risk tolerance, and investment time horizon and give their Advisory Representative any applicable investment policies, guidelines, or reasonable restrictions. Based on this information, the Advisory Representative assists the client in selecting an investment strategy.

Clients may impose restrictions on the investments in their accounts, including designating particular securities or types of securities that should not be purchased for an account. The Advisory Representative will communicate any restrictions imposed by the client to LGA. LGA may reject the restriction or the account if LGA deems the restriction to be unreasonable. However, if a third-party investment manager is selected, your ability to impose restrictions is limited.

### **Other Types of Accounts**

LGA provides advice through other programs and services. These programs and services are described in *Lebenthal Global Advisors, LLC's Disclosure Brochure* which is available upon request. LGA does not manage these accounts differently than accounts in the Program.

### **Assets Under Management**

As of the initial filing of this Brochure on March 5, 2016 we have no assets under management. We intend to manage client assets on a discretionary basis (where we make all the investment decisions) and on a non-discretionary basis (where our clients make the investment decisions based upon our recommendations).

### **No Performance-based Fees or Side-by-Side Management**

Neither LGA nor any of its supervised persons accepts performance-based fees – that is, fees based on a share of capital gains on or capital appreciation of the assets of a client.

Side-by-side management refers to the practice of managing accounts that are charged performance-based fees while at the same time managing accounts that are not charged performance-based fees. We do not participate in side-by-side management.

### **Methods of Analysis, Investment Strategies and Risk**

LGA will primarily rely on publicly available materials, financial publications, research materials prepared by others, annual reports, prospectuses, filings with the SEC, company press releases and timing services. LGA employs a regiment of quantitative and qualitative investment criteria which allows Advisory Representatives to analyze potential funds and select funds for inclusion in the strategies available through the Program.

The investment strategies of our Advisory Representatives may include long-term and short-term investments. You may place reasonable restrictions on the strategies to be employed by your Advisory Representative in your account (such as, for example, the types of investments to be held in your account).

General economic conditions, current interest rates, the performance of a particular industry or a particular company, and any number of other factors can affect investment performance.

You should be prepared to bear the risk of loss. All investments are subject to loss, including (among other things,) loss of principal, a reduction in earnings (including interest, dividends and other distributions), and the loss of future earnings.

The use of margin, options and short sales are higher risk strategies. It is possible to lose all the principal you invest, and sometimes more. In a cash account, your risk is limited to the amount of money that you have invested. In a margin account, your risk includes the amount of money invested plus the amount that has been loaned to you. When you short sell, your losses can be infinite.

You should also be aware that transactions in the account (including account reallocations and rebalancing) may trigger a taxable event for you (unless your account is a qualified retirement account).

We manage wrap fee accounts and non-wrap fee accounts in the same manner.

### **Voting Client Securities**

LGA and its Advisory Representatives do not take any action or give any advice with respect to voting of proxies solicited by or with respect to the issuers of securities in which your accounts may be invested. In addition, we do not take any action or give any advice with respect to any securities held in any accounts that are named in or subject to class action lawsuits.

You will receive information related to proxies directly from your account custodian. We will forward to you any information received by us regarding proxies and class action legal matters involving any securities held in your accounts.

Third-party investment managers proxy policies and procedures differ and will be described in their respective disclosure brochures.

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## **Item 7. Client Information Provided to Portfolio Managers**

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As described in “*Services, Fees and Compensation*” above, clients inform their Advisory Representative of their investment objectives, risk tolerance, and investment time horizon and give their Advisory Representative any applicable investment policies, guidelines, or reasonable restrictions. This information is shared with the third-party investment manager, if one is selected.

This information is updated when you communicate new information about your financial circumstances, objectives, or goals to your Advisory Representative. LGA

values you as a client and recognizes the importance of protecting the personal information you provide. LGA protects your information in accordance with our Privacy Statement which has been provided to you.

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## **Item 8. Client Contact with Portfolio Managers**

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Clients are encouraged to contact their Advisory Representatives when they have questions about their Account, or to update their investment objectives, risk tolerance or other financial information that may affect the way their accounts are managed.

Advisory Representatives are expected to periodically meet with you and generally be available to take your call on advisory-related matters.

Clients do not communicate directly with the third-party investment manager, if one is selected.

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## **Item 9. Additional Information**

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### **Disciplinary Information**

There are no legal or disciplinary events that are material to an evaluation of LGA's advisory business or the integrity of its management

### **Other Financial Industry Activities and Affiliations**

LGA is under common ownership with LFS, a registered broker/dealer, member FINRA/SIPC, and with DPWA, a federally registered investment adviser.

LFS will execute trades for the Client's Program Account if it is the client's chosen broker-dealer. LFS receives compensation for these brokerage services. For non-advisory accounts held at LFS, LGA Advisory Representatives receive commissions on securities transactions as registered representatives through their affiliation with LFS. See your Advisory Representative's Brochure Supplement for additional information regarding their receipt of compensation as broker-dealer representatives of LFS.

Certain principal executive officers of LGA are also officers or employees of LFS and DPWA. These permitted additional responsibilities could be viewed as creating a conflict of interest in that the time and effort of the directors, officers, principals and employees of LGA will not be devoted exclusively to the business of LGA and may have conflicts of interest due to their loyalties to the other entity.

Certain of LGA's principal executive officers, members of the LGA investment committee and other individuals who determine investment advice given to clients are registered representatives of LFS.

When LGA includes certain funds in the Program, LGA's affiliated broker-dealer, LFS, receives additional compensation from those fund sponsors. For example, mutual fund sponsors provide marketing allowances or conference support. LFS, at its sole discretion, may share all or some of any marketing allowance payments with representatives as part of compensating them for marketing and distribution expenditures incurred promoting the sponsor's products. Although LFS receives compensation in connection with investments in products through the Program, no portion of any compensation received from sponsors is passed through to LGA or your Advisory Representative in connection with the Program.

Dominick Tavella, President, is a minority owner of LFS, a registered broker/dealer, member FINRA/SIPC. Mr. Tavella is also the principal owner of DPWA, a federally registered investment adviser. Michael Hartzman is the principal owner of Diversified Private Asset Management, Inc., a state registered investment adviser, and principal owner of LFS. Certain Advisory Representatives of LGA may also be registered representatives of LFS and investment advisor representatives of DPWA. Mr. Hartzman also owns Bristol Capital Corporation, an insurance agency, which makes insurance products and services available to clients of LGA.

Mr. Tavella is a registered representative of LFS and investment advisor representative of DPWA. Mr. Hartzman is a registered representative of LFS, investment advisor representative of DPWA and a licensed insurance agent. You are not obligated to conduct business with Messrs. Hartzman and Tavella in these capacities. Please refer to their respective ADV Part 2B Brochure Supplements for more information about their affiliations.

If you purchase products and services through Messrs. Hartzman and Tavella, or any Advisory Representative in these capacities, they will receive compensation in addition to the advisory fees you pay to LGA. This presents a conflict of interest because this may create an incentive to make recommendations based upon the amount of compensation we can receive rather than based upon your needs. See your Advisory Representative's ADV Part 2B Brochure Supplement for additional information regarding their receipt of compensation as broker-dealer representatives of LFS, investment advisor representatives of DPWA, or insurance agents.

To address this conflict, we will explain the specific costs associated with any recommended investment with you upon request. We also recommend no-load and load waived mutual funds to further reduce conflicts of interest. Additionally, you may purchase investment and insurance products through other brokers or agents who are not affiliated with us.

Mr. Hartzman is also President of our affiliate Bristol Asset Management Corporation, a registered investment advisor. If you purchase products and services



through Mr. Hartzman in this capacity, he will receive advisory fees in addition to the compensation he receives in his role as President. This presents a conflict of interest because this may create an incentive to make recommendations based upon the amount of compensation he can receive rather than based upon your needs. LGA and Bristol Asset Management Corporation addresses this conflict by disclosing this potential conflict to clients to assure that their interests are considered.

Mr. Tavella is also the principal owner of Diversified Financial Consultants, a management support company, and President of WealthSource Financial, LLC. WealthSource Financial, LLC has no clients or assets and is not used for any investment or business purpose.

Mr. Tavella, Mr. Hartzman nor any Advisory Representative of LGA is registered as or has applied for registration as a futures commission merchant, commodity pool operator, a commodity trading advisor, or an associated person of the foregoing entities.

Our Advisory Representatives may also be insurance licensed in one or more states and may recommend the purchase of insurance products to you. They will receive commissions for the sale of such insurance products. In addition to offering insurance products directly, they may also recommend clients purchase insurance products through our affiliate insurance agency, Bristol Capital Corporation. The ability to receive commissions from the sale of insurance products presents a conflict of interest, in that it gives an incentive to recommend a particular insurance product over a different insurance product or a different investment, based on the compensation received, rather than on a client's needs. LGA addresses these conflicts by disclosing this potential conflict to clients to assure that their interests are considered.

### **Code of Ethics and Personal Trading**

LGA has adopted a *Code of Ethics* for all supervised persons of the firm describing our high standard of business conduct, and fiduciary duty to our clients. All supervised persons at our firm must acknowledge the terms of the *Code of Ethics* and personal securities transactions and holdings annually, or as amended. Our *Code of Ethics* sets forth detailed policies and procedures regarding the personal trading of its personnel.

LGA's *Code of Ethics* is designed to ensure that our personnel: a) observe applicable legal (including compliance with applicable state and federal securities laws)

and ethical standards in the performance of their duties; b) at all times place the interests of our clients first; c) disclose all actual or potential conflicts; d) adhere to the highest standards of loyalty, candor and care in all matters relating to our clients; e) conduct all personal trading consistent with the Rules and in such a manner as to



avoid any actual or potential conflict of interest or any abuse of their position of trust and responsibility; and f) not use any material non-public information in securities trading. The Code of Ethics also establishes policies regarding other matters such as outside employment, the giving or receiving of gifts, and safeguarding portfolio holdings information.

Under the general prohibitions of these rules, LGA personnel may not: 1) effect securities transactions while in the possession of material, non-public information; 2) disclose such information to others; 3) participate in fraudulent conduct involving securities held or to be acquired by any client; and 4) engage in frequent trading activities that create or may create a conflict of interest, limit their ability to perform their job duties, or violate any provision of these rules.

LGA personnel are required to conduct their personal investment activities in a manner that is not detrimental to our advisory clients. They are not permitted to transact in securities except under circumstances specified in the Code of Ethics. However, as described above, there may be circumstances when LGA personnel may buy and sell on behalf of its clients, securities of issuers or other investments in which they own securities or otherwise have an interest. The policy requires all Access & Supervised Persons (defined as investment personnel, which includes portfolio managers, research analysts and trading room personnel, operations and officers of LGA, and other designated persons) to report all personal transactions in securities not otherwise exempt under the policy. All reportable transactions are reviewed for compliance with the Code of Ethics.

The Code of Ethics is enforced through compliance monitoring activities and surveillance. In cases where the firm discovers that an employee has violated a firm policy and/or procedure, the firm's code of business conduct or code of ethics, a state or federal law, regulation of FINRA, the SEC, or other regulatory agency, the Compliance Department will take appropriate steps to investigate the circumstances and will take action commensurate with the manner of the violation. Such actions could take the form of a written warning to the employee in conjunction with the firm's Legal Department or be as serious as disciplinary action up to and including termination. Any such investigations will be brought to the appropriate regulator's attention, if necessary, which may result in a disclosure of the violation on the employee's Form U-4, if required.

A copy of the LGA Code of Ethics may be obtained by writing to: Lebenthal Global Advisors, LLC, 200 Parkway Drive South, Suite 200, Hauppauge, NY 11788.

### **Participation or Interest in Client Transactions**

If you choose Raymond James as a custodian (either through LFS or directly) for your account and set up for cash to sweep to a money market fund, LFS receives

compensation from Raymond James of up to 0.20% annually of your assets invested in the sweep money market fund. This compensation represents a conflict of interest because our affiliate has a financial benefit if cash is invested in sweep money market funds. The compensation that LFS receives is in addition to advisory fees that we receive in connection with the assets under management in the account. This compensation is retained by LFS and is not shared with us. Except for Advisory Representatives that have an ownership interest in LFS, this compensation does not cause an IAR to have a financial incentive to recommend that cash be held in the account instead of holding securities.

### **Review of Accounts**

The Advisory Representative is primarily responsible for reviewing the investment strategy selected by the client on an on-going basis to ensure that it continues to be suitable for the client, taking into account any changes to the information provided by the client. No less than annually, Advisory Representative will review the Program with the client, and update the client's information.

We will review your account on an on-going and periodic basis to monitor that your investments and investment strategies are consistent with your stated goals and objective. The Chief Compliance Officer is responsible for the reviews.

As previously noted, we strongly encourage you to advise your Advisory Representative of any changes in your personal circumstances, your investment goals or objectives, and your risk tolerances to ensure that your investments and investment strategies are most appropriate for you.

You will receive account statements directly from your account custodian. Please review these carefully.

### **Client Referrals and Other Compensation**

We enter into written agreements with certain unaffiliated investment advisers and other professionals (such as CPAs, attorneys, etc.) to compensate them for referring clients to us. We will pay these individuals (referred to as "solicitors") a percentage of the advisory fee that you pay us if it is determined that you have become a client of ours because of their direct or indirect efforts.

The payments we make to a solicitor will not result in an increase in the amount of the advisory fee that the referred client will pay.

Our solicitation or referral arrangements will comply with applicable laws that govern:

- the nature of the services provided;
- the fees to be paid;
- disclosure of solicitor arrangements to clients; and
- client consents, as required.

We receive certain economic benefits because of our participation in the institutional brokerage program of the custodians. Those benefits are described in detail in the section above entitled, “Brokerage Practices.”

Except as described above, LGA does not receive direct or indirect compensation related to our advisory services other than the advisory fees paid to us by our clients. However, our affiliates may receive compensation connected to your account with LGA. See “Other Financial Industry Activities and Affiliations” for additional information.

### **Financial Information**

LGA has no financial commitment that impairs our ability to meet contractual and fiduciary commitments to you. LGA has never been the subject of a bankruptcy petition.

### **Brokerage Practices**

We will generally recommend LFS, clearing through Raymond James or Schwab to you for custody and brokerage services although we may agree to employ the services of one or more other custodians. Schwab and Raymond James are federally registered broker/dealers. Schwab and Raymond James (collectively, the “custodian”) offer independent investment adviser services which include custody of client securities, trade execution, clearance and settlement of transactions.

Third party asset managers may require use of certain custodians. Please refer to the Brokerage Practices sections of their respective brochures for more information.

We are independently owned and operated and not affiliated with the custodians we recommend. Our use of a particular custodian is, however, a beneficial business arrangement for us and for the custodian. Information regarding the benefits of this relationship is described below.

Our recommendation of a specific custodian is based in part on our existing relationships; the custodian’s financial strength; reputation; breadth of investment products; and, the cost and quality of custody and brokerage services provided to you and our other clients.

The determining factor in the selection of a particular custodian to execute transactions for your accounts is not the lowest possible transaction cost, but whether they can provide what is in our view the best qualitative execution for investment transactions for your account.

In addition to brokerage and custody services, the custodians may provide access to investments generally available to institutional investors; research; software; and, educational opportunities. The custodians may also make available or arrange for discounts on compliance, marketing, research, technology, and practice management products or services provided to us by third party vendors. Thus, we receive economic benefits as a result of our relationship with the custodians, because we do not have to produce or purchase the products and services listed above.

These services are not contingent upon us committing any specific amount of business to the custodians in trading commissions. LGA does not enter into any “soft dollar” arrangements with custodians and broker/dealers through which we receive research or other services based on commissions generated in your account or the number transactions effected in your account.

Our recommendation of specific custodians may be based in part on the economic benefit to us and not solely on the nature, cost or quality of custody and brokerage services provided to you and our other clients. This may create a conflict of interest for us. We address this conflict by conducting reviews of execution quality and commission rates, trade error rates, quality of client reporting, reputation, and financial strength of the custodians

The custodians may not charge separately for holding our client accounts but may be compensated by you through other transaction-related fees associated with the securities transactions they execute for your account.

Commissions and other fees for transactions executed through the custodians we recommend may be higher than commissions and other fees available if you use another custodian firm to execute transactions and maintain custody of your account. We believe, however, that the overall level of services and support provided to our clients by our recommended custodians outweighs the benefit of possibly lower transactions cost which may be available under other brokerage arrangements.

Many of the services described above may be used to benefit all or a substantial number of our accounts, including accounts not maintained through our recommended custodians. We do not attempt to allocate these benefits to specific clients.

LGA and LFS are subject to maintain a minimum of assets with Raymond James to receive preferred pricing for their services to us. As part of its fiduciary duties to

clients, LGA endeavors always to put the interests of its clients first. You should be aware, however, that our receipt of economic benefits in and of itself creates a potential conflict of interest and may influence our recommendation of Raymond James for custody and brokerage services. In addition, we receive upfront transition payments from Raymond James to assist us with transitioning clients' accounts onto their custodial platforms. We use these fees to offset things like ACAT fees, technology set-up fees, marketing and mailing costs, stationary and licensure transfer fees. This presents a conflict of interest in that we have a financial incentive to recommend that you maintain your account with Raymond James. However, to the extent we recommend you use Raymond James for such services, it is because we believe it is in your best interest to do so based on the quality and pricing of the execution, and other services Raymond James provides.