



# Allstate Financial Services, LLC & Allstate Financial Advisors, LLC

Business Continuity Plan (BCP)





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## I. Emergency Contact Persons

In the event of an emergency our firm's two contact persons are as follows:

Point of Contact Name:	John Boudreau
Telephone:	402-419-8201
Email:	jbouf@allstate.com

Point of Contact Name:	Mary Nelson
Telephone:	402-975-6308 (office), 402-890-5021 (mobile)
Email:	mnel9@allstate.com

These names will be updated in the event of material change, and our Executive Representative will review them annually.

*Rule: FINRA Rule 4370(f); NASD Rule 1160.*

## II. Firm Policy

Our firm'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 our customers to transact business. In the event that we determine we are unable to continue our business, we will assure customers prompt access to their funds and securities.

### A. Significant Business Disruptions (SBDs)

Our plan anticipates two kinds of SBDs, internal and external.

#### 1. Internal SBD

Internal SBDs affect only our firm's ability to communicate and do business as a back-office entity, such as a fire in our building. Internal SBDs do not affect the ability of our Personal Financial Representatives to conduct business with customers. Internal SBDs may affect all or only certain areas of the Firm, and will be assessed



accordingly.

## 2. External SBD

External SBDs prevent the operation of the securities markets or a number of firms, such as a terrorist attack, a city flood, or a wide-scale, regional disruption. Our response to an external SBD relies more heavily on other organizations and systems, especially on the capabilities of our clearing firm.

### B. Approval and Execution Authority

Mary Nelson, a registered principal, is responsible for approving the plan and for conducting the required annual review. Sarah Yelkin, Paul Lanspa and Mary Nelson have the authority to execute this BCP.

### C. Plan Location and Access

Our firm will maintain copies of its BCP plan and the annual reviews, and the changes that have been made to it for inspection. A copy of our plan is available upon request by regulating entities. An electronic copy of our plan is located on the Allstate Financial Services, LLC Intranet and on Allstate.com.

*Rule: FINRA Rule 4370(b), (d) and (e).*

## III. **Business Description**

Our firm's primary business consists of mutual funds, variable life, variable annuities, fixed annuities with limited accommodation of fixed income and equities. Our firm is an introducing firm and does not perform any type of clearing function for itself or others. Furthermore, we do not hold customer funds or securities. We accept and enter orders. All brokerage transactions are sent to our clearing firm, which executes our orders, compares them, allocates them, clears and settles them. Our clearing firm also maintains our customers' brokerage accounts, can grant customers access to them, and delivers funds and securities. Our firm also has customers with accounts held directly with fund companies, or insurance product providers. These direct fund companies, and product providers maintain our customers' direct accounts, can grant customers access to them, and deliver funds and securities. Our firm encourages customers to work directly with their Personal Financial Representative. Our firm services only retail customers. We do not engage in any private placements.



Our clearing firm information is as follows:

Fidelity Clearing & Custody Solutions/National Financial Services  
82 Devonshire Street, Z2R  
Boston, MA 02109  
Website: [www.wealthscape.com](http://www.wealthscape.com)  
Contact: Kevin J. Mcinnis  
Telephone: 401-292-4217  
Email: [kevin.mccinis@fmr.com](mailto:kevin.mccinis@fmr.com)  
Alternate Contact: Melissa Galla  
Telephone: 312.749.9745

#### **IV. Office Locations**

Our Firm has offices located in the following Locations.

##### A. Office Location #1

2920 South 84<sup>th</sup> Street  
Lincoln, NE 68506  
Telephone: 877-525-5727

Our employees may travel to that office by means of foot, car, or bus. We engage in order taking and entry at this location.

#### **V. Alternate Physical Location(s) of Employees**

In the event of an SBD, our staff will work remotely, or we will move our staff from the affected office to the closest of our unaffected office locations.



If none of our other office locations are available to receive those staff, we will move them to one of the following locations:

Imaging AF  
8675 Freeport Pkwy N. MS  
#21 Irving, TX 75063  
Telephone: 972-915-5899

Allstate Insurance  
2775 Sanders Road  
Northbrook, IL 60062  
Telephone: 847-402-8658

In the event, employees are unable to travel, we will identify a local location for employees to work from.

*Rule: FINRA Rule 4370(c)(6).*

## **VI. Customers Access to Funds and Securities**

### A. Brokerage Accounts

Our firm does not maintain custody of customers' funds or securities, which are maintained at our clearing firm, Fidelity Clearing & Custody Solutions. In the event of an internal or external SBD, and Allstate Financial Services, LLC telephone service is unavailable, our registered persons will take customer orders or instructions and contact our clearing firm on their behalf. The firm will make this information available to customers through its disclosure policy.

### B. Direct Accounts

Our firm does not maintain custody of customers' funds or securities, which are maintained at the fund company, or product provider. In the event of an internal or external SBD, and Allstate Financial Services, LLC telephone service is unavailable, our registered persons will direct customers to work with their Personal Financial Representative. If no PFR is available, our registered persons will direct customers to the fund companies, and/or product providers directly. The firm will make this information available to customers through its disclosure policy.

If SIPC determines that we are unable to meet our obligations to our customers or if our liabilities exceed our assets in violation of Securities





Exchange Act Rule 15c3-1, SIPC may seek to appoint a trustee to disburse our assets to customers. We will assist SIPC and the trustee by providing our books and records identifying customer accounts subject to SIPC regulation.

*Rules: FINRA Rule 4370(a); Securities Exchange Act Rule 15c3-1; see also 15 U.S.C. § 78eee.*

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

Our firm maintains its primary hard copy books and record for a minimum of 60 days at:

Allstate Financial Services, LLC  
2920 South 84<sup>th</sup> Street  
Lincoln, NE 68506  
Contact: Shauna Tubbs  
Title: Associate Manager  
Telephone: 402-975-6258  
Email: stubb@allstate.com

and its electronic records at:

Docupace Location:  
Switch Citadel 1  
1 Superloop Circle  
McCarran, NV 89434

Fidelity Information Services  
Voorhees, New Jersey

Our firm maintains the following document types and forms that are not transmitted to our clearing firm:

Electronic Records

Our firm maintains its primary hard copy books and record for a minimum of 60 days at:

Allstate Financial Services, LLC  
2920 South 84<sup>th</sup> Street  
Lincoln, NE 68506  
Contact: Shauna Tubbs  
Title: Associate Manager  
Telephone: 402-975-6258



Email: stubb@allstate.com

These books and records are paper copies. No back up of paper records currently exist.

The firm backs up its electronic records daily, and keeps a copy at

Docupace Location:  
Switch Supernap 4  
4495 E. Sahara  
Las Vegas, NV 89101

Fidelity Information Services  
Hopkins, Minnesota

In the event of an internal or external SBD that causes the loss of our paper records, we will file appropriate notices with our regulators. If our primary site is inoperable, we will continue operations from our back-up site or an alternate location. For the loss of electronic records, we will either physically recover the storage media or electronically recover data from our back-up site, or, if our primary site is inoperable, continue operations from our back-up site or an alternate location.

Rule: FINRA Rule 4370(c)(1).

## **VIII. Financial and Operational Assessments**

### A. Operational Risk

In the event of an SBD, we will immediately identify what means will permit us to communicate with our customers, employees, critical business constituents, critical banks, critical counter-parties, and regulators. Although the effects of a SBD will determine the means of alternate communication, the communications options we will employ will include telephone voice mail, and secure e-mail, etc. In addition, we will retrieve our key activity records as described in the section above, Data Back-Up and Recovery (Hard Copy and Electronic)

Rules: FINRA Rules 4370(c)(3), (c)(4), (c)(5), (c)(7), (c)(9 & (g)(2)).



## B. Financial and Credit Risk

In the event of an SBD, we will determine the value and liquidity of our investments and other assets to evaluate our ability to continue to fund our operations and remain in capital compliance. We will contact Allstate Insurance Company and our product manufacturers. If we determine that we may be unable to meet our obligations to those counter- parties or otherwise continue to fund our operations, we will request additional financing from our bank or other credit sources to fulfill our obligations. If we cannot remedy a capital deficiency, we will file appropriate notices with our regulators and immediately take appropriate steps.

Rules: *FINRA Rules 4370(c)(3), (c)(8) & (g)(2).*

## IX. **Mission Critical Systems**

Our firm’s “mission critical systems” are those that ensure prompt and accurate processing of securities transactions, including order taking, entry, the maintenance of customer accounts, and access to customer accounts. It also involved access to personal financial representative (PFR) records. More specifically, these systems include:

System	Function
Bond TraderPro	<ul style="list-style-type: none"><li>• Entry of fixed income trades</li></ul>
Brokerage XChange	<ul style="list-style-type: none"><li>• Entry of mutual fund/Equity Trades</li></ul>
Data Trax	<ul style="list-style-type: none"><li>• Registered Representative Core Databank</li></ul>
FBSI	<ul style="list-style-type: none"><li>• Service Brokerage Accounts</li></ul>
WealthScape WealthScape Investor	<ul style="list-style-type: none"><li>• Service brokerage accounts</li><li>• Initiate transfers/IRA distributions</li><li>• Initiate customer service items</li></ul>
Onboard	<ul style="list-style-type: none"><li>• Establish/service direct &amp; brokerage accounts</li></ul>
ProSurv	<ul style="list-style-type: none"><li>• Maintains and reviews account transactions</li></ul>
Docupace	<ul style="list-style-type: none"><li>• Maintains images of customer and rep paperwork</li></ul>
ServeMe Suite	<ul style="list-style-type: none"><li>• Maintains and reviews compensation transactions</li></ul>



SAP	<ul style="list-style-type: none"><li>• Maintains employee contact information</li></ul>
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We have primary responsibility for establishing and maintaining our business relationships with our customers and have sole responsibility for our mission critical functions of order taking and entry. Our clearing firm, National Financial Services, LLC, 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.

Our clearing firm contract provides that our clearing firm will maintain a business continuity plan and the capacity to execute that plan. Our clearing firm represents that it will advise us of any material changes to its plan that might affect our ability to maintain our business and presented us with an executive summary of its plan. In the event our clearing firm executes its plan, it represents that it will notify us of such execution and provide us equal access to services as its other customers. If we reasonably determine that our clearing firm has not or cannot put its plan in place quickly enough to meet our needs, or is otherwise unable to provide access to such services, our clearing firm represents that it will assist us in seeking services from an alternative source.

Our clearing firm represents that it backs up our records at a remote site. Our clearing firm represents that 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. Our 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 at least 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. Our clearing firm has the following SBD recovery time and resumption objectives: recovery time period of less than an hour, and resumption time of less than a day.

#### A. Our Firm's Mission Critical Systems



## 1. Order Taking

Currently, our firm receives orders, for brokerage accounts, from customers via telephone. During an SBD, either internal or external, we will continue to take orders through any of these methods that are available and reliable, and in addition, as communications permit, we will inform our customers when communications become available to tell them what alternatives they have to submit their orders to us. Customers will be informed of alternatives by recorded telephone messages, and/or employee associates answering customer inquiries. If necessary, we will advise our customers to inquire about accounts, liquidate trades and/or certain money movement transactions directly with our clearing firm 866-408-1132 from 8:30am-5:00pmET.

## 2. Order Entry

Currently, our firm enters brokerage orders by sending them to our clearing firm electronically or telephonically. Alternatively, we place customer orders through Brokerage XChange, Wealthscape, and FBSI. We have contacted our clearing firm and were told that, under its BCP, we can expect services within 24 hours.

In the event of an internal SBD, we will enter and send records to our clearing firm by the fastest alternative means available, which include fax, secured e-mail, and overnight carriers. In the event of an external SBD, we will maintain the order in electronic paper format, and deliver the order to the clearing firm by the fastest means available when it resumes operations. In addition, during an internal SBD, we may need to refer customers to deal directly with our clearing firm for order entry.

### B. Mission Critical Systems Provided by Our Clearing Firm

Our firm relies, by contract, on our clearing firm to provide order execution, order comparison, order allocation, and the maintenance of customer brokerage accounts, delivery of funds and securities, and access to these accounts.

*Rules: FINRA Rules 4370 (c)(2) & (g)(1).*

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



### Customers

We now communicate with our customers using the telephone, fax, e-mail, U.S. mail, and in-person visits at our registered representative's office locations. In the event of an 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.

*Rule: FINRA Rule 4370(c)(4).*

### Employees

We now communicate with our employees using the telephone, e-mail, text and in-person. In the event of an 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 majority of our employees are able to work remotely.

*Rule: FINRA Rule 4370(c)(5).*

### Regulators

We are currently members of the following SROs: FINRA. We communicate with our regulators using the telephone, e-mail, fax, U.S. mail, and in person. In the event of an 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.

*Rule: FINRA Rule 4370(c)(9).*

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

### Business Constituents

We have contacted our critical business constituents (businesses with which we have ongoing commercial relationship in support of our



operating activities, such as vendors providing us critical services), and determined the extent to which we can continue our business relationship with them in light of the internal or external SBD. We 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.

Our major suppliers are:

- Allstate
- FCCS/National Financial Services
- Fidelity Information Services
- RegEd
- Docupace Technologies
- Prudential Annuities
- Equitable
- Protective
- Sammons Financial Group
- Lincoln Financial Group

Rules: FINRA Rule 4370(c)(7).

### Banks

We will contact our banks and lenders to determine if they can continue to provide the financing that we will need in light of the internal or external SBD.

The bank maintaining our operating account and our Proprietary Account of Introducing Broker-Dealers (PAIB account) is:

US Bank (Lincoln/Lincolnshire Location)  
1440 S. 70th  
Contact: Bernice Dirks  
Telephone: 630-637-2763  
Local Branch: 402-484-4400  
US Bank Toll Free: 800-377-3053

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

Allstate Insurance Corporation  
2775 Sanders Road  
Contact: Mark Prindville  
Telephone: 847-402-0470



Rules: FINRA Rule 4370(c)(7).

### Counter-Parties

We have 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.

Rules: FINRA Rule 4370(c)(7).

## **XII. Regulatory Reporting**

Our firm is subject to regulation by: Security & Exchange Commission, FINRA Regulation, and MSRB. We now file reports with our regulators using paper copies in the U.S. mail, and through e-mail. In the event of an 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.

Security & Exchange Commission  
Salt Lake District Office  
50 South Main St. Ste. #500  
Salt Lake City, UT 84144  
Telephone: 801-524-3558

FINRA Regulation  
12 Wyandotte Plaza  
120 West 12<sup>th</sup> St, Suite 800  
Kansas City, MO 64105-1930  
Contact: Gregory Luken  
Telephone: 816-802-4750  
Email: greg.luken@finra.org

MSRB (Municipal Securities Rulemaking Board)  
1900 Duke St Ste. #600  
Alexandria, VA 22314-3412  
Telephone: 703-797-6600





Rule: FINRA Rule 4370(c)(8).

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

We disclose in writing a summary of our BCP to customers at account opening. We also mail it to customers upon request. Our 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, our summary (1) provides specific scenarios of varying severity (e.g., a firm-only business disruption, a disruption to a single building, 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) provides general information on our intended response. Our summary discloses the existence of back-up facilities and arrangements.

Rule: FINRA Rule 4370(e).

### **XIV. Updates and Annual Review**

Our firm will update this plan whenever we have a material change to our operations, structure, business or location or to those of our clearing firm. In addition, our firm will review this BCP annually, to modify it for any changes in our operations, structure, business, or location or those of our clearing firm

Rule: FINRA Rule 4370(b).

### **XV. Senior Management Approval**

I have approved this Business Continuity Plan as reasonably designed to enable our firm to meet its obligations to customers in the event of an SBD.

Rule: FINRA Rule 4370(d).

Signed: John Boudreau  
Title: Chief Compliance Officer  
Date: November 8, 2021

Signed: Paul Lanspa  
Title: Director - Operations  
Date: November 8, 2021