



STATE OF MISSOURI  
OFFICE OF SECRETARY OF STATE

IN THE MATTER OF: )  
 )  
ALISON NICOLE ANDREWS, CRD No. 6196235, and )  
DIANA SUE CHADWICK, CRD No. 3139436, ) Case No. AP-16-33  
 )  
Respondents. )

**CONSENT ORDER**

**SUMMARY OF THE ENFORCEMENT SECTION'S ALLEGATIONS**

1. The Enforcement Section of the Missouri Securities Division of the Office of Secretary of State ("Enforcement Section"), through Chief Counsel Tyler B. McCormick, has alleged that Alison Nicole Andrews ("Andrews") and Diana Sue Chadwick ("Chadwick"), engaged in dishonest and unethical practices while registered as broker-dealer agents in violation of Section 409.4-412(d)(13), RSMo. (Cum. Supp. 2013),<sup>1</sup> and that this constitutes grounds to discipline pursuant to Section 409.4-412.
2. Respondents and the Enforcement Section desire to settle the allegations and the matters raised by the Enforcement Section relating to the Respondents' alleged violations of Section 409.4-412.

**CONSENT TO JURISDICTION**

3. Respondents and the Enforcement Section stipulate and agree that the Missouri Commissioner of Securities ("Commissioner") has jurisdiction over Respondents and these matters pursuant to the Missouri Securities Act of 2003, Chapter 409, *et seq.*
4. Respondents and the Enforcement Section stipulate and agree that the Commissioner has authority to enter this Order pursuant to Section 409.6-604(h), which provides:

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<sup>1</sup> Unless otherwise noted, all statutory references are to the 2013 cumulative supplement to the Revised Statutes of Missouri.

“The commissioner is authorized to issue administrative consent orders in the settlement of any proceeding in the public interest under this act.”

#### WAIVER AND EXCEPTION

5. Respondents waive Respondents’ right to a hearing with respect to this matter.
6. Respondents waive any rights that Respondents may have to seek judicial review or otherwise challenge or contest the terms and conditions of this Order. Respondents specifically forever release and hold harmless the Missouri Office of Secretary of State, Secretary of State, Commissioner, and their respective representatives and agents from any and all liability and claims arising out of, pertaining to, or relating to this matter.
7. Respondents stipulate and agree with the Enforcement Section that, should the facts contained herein prove to be false or incomplete, the Enforcement Section reserves the right to pursue any and all legal or administrative remedies at its disposal.

#### CONSENT TO COMMISSIONER’S ORDER

8. Respondents and the Enforcement Section stipulate and agree to the issuance of this Consent Order without further proceedings in this matter, agreeing to be fully bound by the terms and conditions specified herein.
9. Respondents agree not to take any action or to make or permit to be made any public statement creating the impression that this Order is without factual basis. Nothing in this paragraph affects Respondents’ (a) testimonial obligations; (b) right to take legal or factual positions in defense of litigation or in defense of other legal proceedings in which the Commissioner is not a party; or (c) right to make public statements that are factual.
10. Respondents agree that Respondents are not the prevailing party in this action since the parties have reached a good faith settlement.
11. Respondents neither admit nor deny the allegations made by the Enforcement Section, but consent to the Commissioner’s Findings of Fact, Conclusions of Law, and Order as set forth below solely for the purposes of resolving this proceeding and any proceeding that may be brought to enforce the terms of this Consent Order.

#### COMMISSIONER’S FINDINGS OF FACT, CONCLUSIONS OF LAW, AND ORDER

##### I. FINDINGS OF FACT

##### A. Respondents and Related Parties

12. Allstate Financial Services, LLC (“Allstate”) has a home office address of 2920 South 84<sup>th</sup> Street, Lincoln, Nebraska 68506. Allstate has been a Missouri registered broker-

dealer since November 15, 1994, with a Central Registration Depository (“CRD”) number of 18272.

13. Andrews is a 30-year-old Missouri resident with an address of 2617 Paula Drive, West Plains, Missouri 65775. Andrews was a Missouri registered broker-dealer agent with Allstate from May 15, 2013 through May 1, 2015, with a CRD number of 6196235.
14. Chadwick is a 63-year-old Missouri resident with an address of 1301 County Road 6020, West Plains, Missouri 65775. Chadwick was a Missouri registered broker-dealer agent with Allstate from June 25, 2010 through July 31, 2015, with a CRD number of 3139436.

B. Enforcement Section Investigation

15. In December 2013, Chadwick was attempting to transfer assets of a West Plains, Missouri resident (“MR”) to Allstate. MR was 79 years-old at the time.
16. MR’s son (“KA”) had a power of attorney over MR, but had been unsuccessful in obtaining copies of account statements from another Missouri registered broker-dealer (“Broker-Dealer”) where MR’s assets were held.
17. Chadwick directed Andrews to obtain MR’s account statements from the Broker-Dealer.
18. On five occasions between December 16, 2013 and December 18, 2013, Andrews called the Broker-Dealer and falsely claimed to be MR’s relative in an effort to obtain MR’s account statements.
19. On December 17, 2013, KA submitted an online complaint to the Financial Industry Regulatory Authority (“FINRA”) that alleged that the Broker-Dealer had refused to provide KA with MR’s account statements.
20. On March 11, 2014, Andrews called FINRA’s Office of Fraud Detection and Market Intelligence and attempted to obtain information about the status of the complaint.
21. During the call with FINRA, Andrews falsely claimed that she was KA’s daughter.
22. The Broker-Dealer ultimately provided KA with the requested documents after determining that KA had a valid power of attorney to act on behalf of MR.
23. After Chadwick and Andrews learned that FINRA was investigating Andrews’ claim that Andrews was MR’s relative, a plan was devised to provide FINRA with false information.
24. According to the plan, Andrews would testify to FINRA that Andrews had only stated that Andrews was “like” KA’s daughter during the telephone calls with the Broker-Dealer.

25. During Andrews' on-the-record testimony with FINRA ("Andrews OTR") on October 29, 2014, Andrews testified that she had not claimed to be MR's relative during the telephone calls, and had instead said that she was "like" KA's daughter.
26. To support Andrews' claim that she was "like" KA's daughter, Andrews testified that she had known KA since 2006.
27. In addition, in her April 21, 2014 written response to a request for documents and information made by FINRA, Andrews claimed that KA was like her part-time father, and that KA and KA's wife had unofficially adopted her.
28. In fact, Andrews never had a close personal relationship with KA, and she first became acquainted with KA in late 2013 in a professional capacity.
29. During Chadwick's on-the-record testimony with FINRA ("Chadwick OTR") on February 23, 2015, Chadwick, aware that Andrews had claimed to be MR's relative, repeated the false claim that Andrews had said that she was "like" KA's daughter during the telephone calls.
30. MR passed away on December 26, 2014.
31. On May 17, 2016, Andrews entered into an Acceptance, Waiver and Consent Agreement ("Andrews AWC") with FINRA which was accepted by FINRA on June 14, 2016. The Andrews AWC sets forth that Andrews accepted and consented to findings, without admitting or denying the findings, that by falsely claiming to be a relative of a customer in an effort to obtain account documents and to obtain the status of a complaint submitted to FINRA, Andrews violated FINRA Rule 2010, and by making false statements during the Andrews OTR and written response, Andrews violated FINRA Rules 8210 and 2010. Andrews consented to the imposition of a bar from associating with any FINRA member in any capacity.
32. On June 21, 2016, Chadwick entered into an Acceptance, Waiver and Consent Agreement ("Chadwick AWC") with FINRA which was accepted by FINRA on July 14, 2016. The Chadwick AWC sets forth that Chadwick accepted and consented to findings, without admitting or denying the findings, that by false on-the-record testimony or written responses to FINRA, Chadwick violated FINRA Rules 8210 and 2010, and by making misleading statements during her on-the-record testimony, Chadwick violated FINRA rules 8210 and 2010. Chadwick consented to the imposition of a bar from associating with any FINRA member in any capacity.

## II. CONCLUSIONS OF LAW

33. The Commissioner concludes that Respondents engaged in dishonest and unethical practices while registered as broker-dealer agents in violation of Section 409.4-412(d)(13), and that this constitutes grounds to discipline Respondents under Section 409.4-412.

34. The Commissioner, after consideration of the stipulations set forth above and on the consent of the Respondents and the Enforcement Section, finds and concludes that the Commissioner has jurisdiction over the Respondents in this matter and that the following Order is in the public interest, necessary for the protection of public investors, and consistent with the purposes intended by Chapter 409, RSMo.

### III. ORDER

**NOW THEREFORE**, it is hereby ordered that:

1. Respondents, their agents, employees and servants, and all other persons participating in or about to participate in the above-described violations with knowledge of this Order are permanently enjoined and restrained from engaging in dishonest or unethical practices in violation of Section 409.4-412(d)(13); and
2. Respondents are hereby **BARRED** from registering as a broker-dealer, investment adviser, broker-dealer agent or investment adviser representative in the State of Missouri.

**SO ORDERED:**

WITNESS MY HAND AND OFFICIAL SEAL OF MY OFFICE AT JEFFERSON CITY,  
MISSOURI THIS 19TH DAY OF SEPTEMBER 2016.



JASON KANDER  
SECRETARY OF STATE

*Andrew M. Hartnett*

ANDREW M. HARTNETT  
COMMISSIONER OF SECURITIES

Consented to by:

THE ENFORCEMENT SECTION OF THE  
MISSOURI SECURITIES DIVISION

*Tyler B. McCormick*

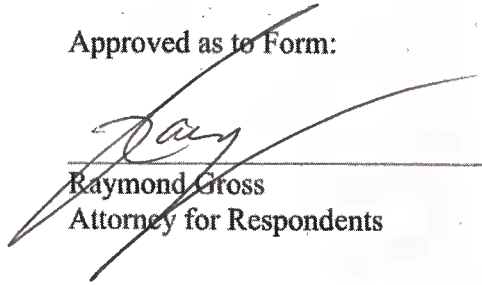
Tyler B. McCormick  
Chief Counsel

RESPONDENTS

\_\_\_\_\_  
Diana Sue Chadwick

  
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Alison Nicole Andrews

Approved as to Form:

  
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Raymond Gross  
Attorney for Respondents

RESPONDENTS

  
Diana Sue Chadwick

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Alison Nicole Andrews

Approved as to Form:

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Raymond Gross  
Attorney for Respondents