

**FINANCIAL INDUSTRY REGULATORY AUTHORITY
LETTER OF ACCEPTANCE, WAIVER AND CONSENT
NO. 2013039630301**

TO: Department of Enforcement
Financial Industry Regulatory Authority ("FINRA")

RE: Alison Nicole Andrews, Respondent
Former Registered Representative
CRD No. 6196235

Pursuant to FINRA Rule 9216 of FINRA's Code of Procedure, I submit this Letter of Acceptance, Waiver and Consent ("AWC") for the purpose of proposing a settlement of the alleged rule violations described below. This AWC is submitted on the condition that, if accepted, FINRA will not bring any future actions against me alleging violations based on the same factual findings described herein.

I

ACCEPTANCE AND CONSENT

A: I hereby accept and consent, without admitting or denying the findings, and solely for the purposes of this proceeding and any other proceeding brought by or on behalf of FINRA, or to which FINRA is a party, prior to a hearing and without an adjudication of any issue of law or fact, to the entry of the following findings by FINRA:

BACKGROUND

Between May 22, 2013 and May 1, 2015, Alison Nicole Andrews was registered as an investment company products/variable contracts representative with Allstate Financial Services, LLC ("Allstate"). Andrews is no longer registered with a FINRA member, but remains subject to FINRA's jurisdiction pursuant to Article V, Section 4 of the FINRA By-Laws of the Corporation.

OVERVIEW

After a potential customer's son was unsuccessful in obtaining copies of his elderly mother's account statements, Andrews falsely claimed that she was a relative of the elderly customer to obtain the statements. She then made the same false claim in an unsuccessful attempt to obtain information about the status of a FINRA investigation. After FINRA began investigating her conduct, Andrews attempted to mislead FINRA during her on-the-record testimony and in her written responses to requests for information. Andrews's misconduct violated FINRA Rules 2010 and 8210.

FACTS AND VIOLATIVE CONDUCT

In December 2013, a more experienced registered representative in Andrews's office was attempting to transfer the assets of an elderly customer to Allstate. The customer's son had a power of attorney over his mother, but had been unsuccessful in obtaining copies of the account statements from the FINRA member firm where the assets were held. Acting at the suggestion of the other representative, on five occasions between December 16, 2013 and December 18, 2013, Andrews called the FINRA member firm and falsely claimed to be the customer's relative in an effort to obtain the customer's account statements.

On December 17, 2013, the customer's son submitted an online complaint with FINRA that alleged that the FINRA member firm had refused to provide him with his mother's account statements. 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. During the call with FINRA, Andrews falsely claimed that she was the son's daughter.

The other FINRA member firm ultimately provided the son with the requested documents after determining that he had a valid power of attorney to act on behalf of his mother.

After Andrews and the more experienced registered representative learned that FINRA was investigating Andrews's claim that she was the customer's relative, they devised a plan to provide FINRA with false information. During her on-the-record testimony on October 29, 2014, Andrews testified that she had not claimed to be the customer's relative during the telephone calls, and had instead said that she was "like" his daughter. To support her false claim that she was "like" the son's daughter, Andrews testified that she had known the son since 2006. In addition, in her April 21, 2014 written responses to a request for documents and information issued pursuant to FINRA Rule 8210, Andrews claimed that the customer's son was like her part-time father, and that he and his wife had unofficially adopted her. In fact, Andrews never had a close personal relationship with the son, and she first became acquainted with him in late 2013 in a professional capacity.

FINRA Rule 2010 requires that members and their associated persons observe high standards of commercial honor and just and equitable principles of trade. Rule 2010 is not limited to rules of legal conduct, but rather states a broad ethical principle. 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.

FINRA Rule 8210 allows FINRA to require FINRA members, persons associated

with a member, and other persons subject to FINRA's jurisdiction to provide oral, written, and electronic information with respect to any matter involved in an investigation, complaint, examination, or proceeding. Providing false on-the-record testimony or written responses to FINRA in connection with an investigation violates FINRA Rule 8210 and FINRA Rule 2010. By making false statements during her on-the-record testimony and written responses, Andrews violated FINRA Rules 8210 and 2010.

B. I also consent to the imposition of the following sanctions:

- A bar from associating with any FINRA member in any capacity.

I understand that if I am barred or suspended from associating with any FINRA member, I become subject to a statutory disqualification as that term is defined in Article III, Section 4 of FINRA's By-Laws, incorporating Section 3(a)(39) of the Securities Exchange Act of 1934. Accordingly, I may not be associated with any FINRA member in any capacity, including clerical or ministerial functions, during the period of the bar or suspension (see FINRA Rules 8310 and 8311).

The sanctions imposed herein shall be effective on a date set by FINRA staff. A bar or expulsion shall become effective upon approval or acceptance of this AWC.

II.

WAIVER OF PROCEDURAL RIGHTS

I specifically and voluntarily waive the following rights granted under FINRA's Code of Procedure:

- A. To have a Complaint issued specifying the allegations against me;
- B. To be notified of the Complaint and have the opportunity to answer the allegations in writing;
- C. To defend against the allegations in a disciplinary hearing before a hearing panel, to have a written record of the hearing made and to have a written decision issued; and
- D. To appeal any such decision to the National Adjudicatory Council ("NAC") and then to the U.S. Securities and Exchange Commission and a U.S. Court of Appeals.

Further, I specifically and voluntarily waive any right to claim bias or prejudgment of the Chief Legal Officer, the NAC, or any member of the NAC, in connection with such person's or body's participation in discussions regarding the terms and conditions of this AWC, or other

consideration of this AWC, including acceptance or rejection of this AWC.

I further specifically and voluntarily waive any right to claim that a person violated the ex parte prohibitions of FINRA Rule 9143 or the separation of functions prohibitions of FINRA Rule 9144, in connection with such person's or body's participation in discussions regarding the terms and conditions of this AWC, or other consideration of this AWC, including its acceptance or rejection.

III.

OTHER MATTERS

I understand that:

- A. Submission of this AWC is voluntary and will not resolve this matter unless and until it has been reviewed and accepted by the NAC, a Review Subcommittee of the NAC, or the Office of Disciplinary Affairs ("ODA"), pursuant to FINRA Rule 9216;
- B. If this AWC is not accepted, its submission will not be used as evidence to prove any of the allegations against me; and
- C. If accepted:
 - 1. this AWC will become part of my permanent disciplinary record and may be considered in any future actions brought by FINRA or any other regulator against me;
 - 2. this AWC will be made available through FINRA's public disclosure program in accordance with FINRA Rule 8313;
 - 3. FINRA may make a public announcement concerning this agreement and the subject matter thereof in accordance with FINRA Rule 8313; and
 - 4. I may not take any action or make or permit to be made any public statement, including in regulatory filings or otherwise, denying, directly or indirectly, any finding in this AWC or create the impression that the AWC is without factual basis. I may not take any position in any proceeding brought by or on behalf of FINRA, or to which FINRA is a party, that is inconsistent with any part of this AWC. Nothing in this provision affects my: (i) testimonial obligations; or (ii) right to take legal or factual positions in litigation or other legal proceedings in which FINRA is not a party.

I certify that I have read and understand all of the provisions of this AWC and have been given a

full opportunity to ask questions about it; that I have agreed to its provisions voluntarily; and that no offer, threat, inducement, or promise of any kind, other than the terms set forth herein and the prospect of avoiding the issuance of a Complaint, has been made to induce me to submit it.

05/17/2016

Date (mm/dd/yyyy)

Alison N. Andrews

Respondent Alison Nicole Andrews

Reviewed by:

Raymond Gross

Counsel for Respondent
Pointer Law Office, P.C.
496 Third Street
PO Box 400
Gainesville, MO 65655
417-679-2203

Accepted by FINRA:

June 14, 2016

Date

Signed on behalf of the
Director of ODA, by delegated authority

Thomas S. Kimbrell

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