

**FINANCIAL INDUSTRY REGULATORY AUTHORITY
LETTER OF ACCEPTANCE, WAIVER AND CONSENT
NO. 2013039630302**

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

RE: Diana Sue Chadwick, Respondent
Former Registered Representative
CRD No. 3139436

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 December 18, 1998 and July 31, 2015, Diana Sue Chadwick was registered as an Investment Company/Variable Contracts Representative. Between August 6, 2010 and July 31, 2015, she was registered in that capacity with Allstate Financial Services, LLC ("Allstate"). Chadwick 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

Between October 2014 and February 2015, while associated with Allstate, Chadwick directed a more junior registered representative at Allstate to mislead FINRA in her on-the-record interview, and then repeated the same false claim during her own on-the-record interview. Chadwick thereby violated FINRA Rules 2010 and 8210.

FACTS AND VIOLATIVE CONDUCT

In December 2013, Chadwick was attempting to transfer the assets of an elderly customer to Allstate. The customer's son had a power of attorney that had been executed many years earlier but had been unsuccessful in obtaining information about his mother's accounts. Chadwick directed a more junior registered representative in the office to obtain the customer's statements from the customer's existing firm. The more junior registered representative called the member firm and claimed that she was a relative of the customer in order to obtain copies of the account statements.

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 Chadwick learned that FINRA was investigating the junior employee's claims that she was the customer's relative, Chadwick told the junior employee to testify to FINRA that the junior employee had only stated that she was "like" the son's daughter during the telephone calls with the other firm. Chadwick also repeated this false claim during her own on-the-record testimony with FINRA on February 23, 2015. At the time, Chadwick was aware that the junior employee had claimed to be the customer's relative.

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 misleading statements during her on-the-record testimony and by instructing the junior employee to do so, Chadwick 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:

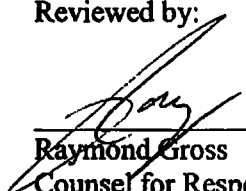
1. this AWC will become part of my permanent disciplinary record and may be considered in any future actions brought by FINRA or any other regulator against me;
2. this AWC will be made available through FINRA's public disclosure program in accordance with FINRA Rule 8313;
3. FINRA may make a public 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.

June 21, 2016
Date (mm/dd/yyyy)

Diana Sue Chadwick
Respondent Diana Sue Chadwick

Reviewed by:

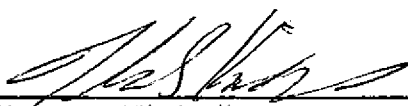


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417-679-2203

Accepted by FINRA:

July 14, 2016
Date

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



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