

**FINANCIAL INDUSTRY REGULATORY AUTHORITY
LETTER OF ACCEPTANCE, WAIVER AND CONSENT
NO. 2015048104201**

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

RE: Bette Tydings, Respondent
CRD No. 844203

Pursuant to FINRA Rule 9216 of FINRA's Code of Procedure, I, Bette Tydings ("Tydings" or "Respondent"), 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

Tydings first became registered as an Investment Company Products and Variable Contracts Representative and as a Direct Participation Programs Representative in February 1984. Tydings became registered as a Direct Participation Programs Principal in June 1993, and as an Investment Company Products and Variable Contracts Principal in January 1998.

Tydings worked with several FINRA registered firms prior to joining Independent Financial Group, LLC (CRD No. 7717) ("Independent Financial Group") in April 2010, where she was registered in the four above-listed capacities. Tydings left Independent Financial Group in April 2013. After a period of time outside the industry, Tydings joined Primex (CRD No. 29394) ("Primex") in August 2014. She has been registered in the four above-listed capacities through Primex since that time.

RELEVANT DISCIPLINARY HISTORY

Tydings has no relevant formal disciplinary history with the Securities and Exchange Commission, any self-regulatory organization or any state securities regulator.

OVERVIEW

Tydings willfully failed to timely amend her Uniform Application for Securities Industry Registration or Transfer ("Form U4") to disclose one bankruptcy petition and one federal tax lien. As a result, she violated Article V, Section 2(c) of FINRA's By-Laws, and FINRA Rules 1122 and 2010.

FACTS AND VIOLATIVE CONDUCT

Article V, Section 2(c) of FINRA's By-Laws provides that every application for registration filed with FINRA shall be kept current at all times by supplementary amendments, which must be filed within 30 days after learning of the facts or circumstances giving rise to the amendment.

Question 14K(1) of the Form U4 asks: "Within the past 10 years ... have you made a compromise with creditors, filed a bankruptcy petition or been the subject of an involuntary bankruptcy petition?"

Question 14M of the Form U4 asks: "Do you have any unsatisfied judgments or liens against you?"

In addition, FINRA Rule 1122 provides that: "No member or person associated with a member shall file with FINRA information with respect to membership or registration which is incomplete or inaccurate so as to be misleading, or which could in any way tend to mislead, or fail to correct such filing after notice thereof."

On June 27, 2011, while associated with Independent Financial Group, Tydings filed a Chapter 7 bankruptcy petition in the United States Bankruptcy Court for the Central District of California. Tydings should have updated her response to Question 14K(1) of the Form U4 within 30 days of filing the bankruptcy petition; however, she failed to do so until July 8, 2015.

On October 7, 2010, the IRS filed a federal tax lien against Tydings in the amount of \$38,961.03; Tydings was registered through Independent Financial Group at the time. Tydings received notice of this lien by mail. Tydings should have updated her response to Question 14M of the Form U4 within 30 days of receiving notice of the above-referenced lien; however, she failed to do so until July 8, 2015.

By willfully failing to timely disclose the above-referenced bankruptcy petition and tax lien on her Form U4, Tydings violated Article V, Section 2(c) of FINRA's By-Laws, and FINRA Rules 1122 and 2010.

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

- A suspension from association with any FINRA member in any and all capacities for a period of four months.

Respondent has submitted a sworn financial statement and demonstrated an inability to pay. In light of the financial status of Respondent, no monetary sanctions have been imposed.

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).

I understand that this settlement includes a finding that I willfully omitted to state a material fact on a Form U4, and that under Section 3(a)(39)(F) of the Securities Exchange Act of 1934 and Article III, Section 4 of FINRA's By-Laws, this omission makes me subject to a statutory disqualification with respect to association with a member.

The sanctions imposed herein shall be effective on a date set by FINRA staff.

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.

- D. I may attach a Corrective Action Statement to this AWC that is a statement of demonstrable corrective steps taken to prevent future misconduct. I understand that I may not deny the charges or make any statement that is inconsistent with the AWC in this Statement. This Statement does not constitute factual or legal findings by FINRA, nor does it reflect the views of FINRA or its staff.

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.

July 5 2016
Date (mm/dd/yyyy)

Bette Tydings
Bette Tydings

Accepted by FINRA:

9/26/2016
Date

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

Lisa M. Colone

Lisa M. Colone
Senior Regional Counsel
FINRA Department of Enforcement
581 Main Street, Suite 710
Woodbridge, NJ 07095
Tel: (732) 596-2078
Fax: (202) 721-6511