WORLD EVOLUTION ENTERPRISE PBC

Written Input to the U.S. Securities and Exchange Commission Crypto Task Force

Re: Regulatory Clarity for Pre-Operational, Natural-Capital-Referenced Digital Instruments

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Submitted by:

Brian James Heaton

Founder, President, and Chairperson

World Evolution Enterprise PBC

Bryen40o@gmail.com 830 327-9644

I. Purpose of Submission

World Evolution Enterprise PBC ("WEE PBC") respectfully submits this written input to support practical, technology-neutral regulatory clarity for early-stage developers of digital systems that use distributed-ledger or related technology to record verified natural-capital information.

WEE PBC is a Delaware public benefit corporation in a pre-operational stage. It is developing the Exo-Terran Resource Trust ("ETRT"), a proposed Universal Registry, and a proposed Exo-Terran Credit ("ETC"). No ETC has been issued, offered, sold, distributed, or listed for trading. No Minting Event has occurred, and the proposed Universal Registry is not operational.

This submission does not seek a determination, exemption, no-action position, endorsement, or approval by the Commission. It asks the Crypto Task Force to consider how the Commission can provide usable, fact-sensitive guidance to pre-operational projects before public issuance or market activity begins.

II. Project Context

ETC is intended to be a non-debt, natural-capital-referenced digital accounting and verification instrument within a proposed registry and stewardship architecture. The intended design uses independently verifiable natural-capital methodologies and a permanent asset-lock principle intended to prevent unverified issuance and use of the underlying Trust Corpus as debt collateral.

ETC is not intended to be legal tender, dollar-pegged, redeemable or repurchasable at a fixed monetary value, or operated as a general-purpose payment stablecoin. WEE PBC does not propose that ETC holders receive an ownership interest in, lien on, or direct redemption claim against a particular ETRT Corpus asset.

The proposed architecture also includes a Verified Beneficiary framework and a Universal Birthright Dividend concept. These concepts remain unlaunched and subject to securities, payments, tax, sanctions, and other legal review. WEE PBC recognizes that program labels and design intent do not independently determine legal classification.

III. Regulatory Question

The principal securities-law question is how the Commission's framework should distinguish among:

A digital instrument that records or facilitates independently verifiable natural-capital attribution, provenance, accounting, or stewardship functions;

A digital instrument offered or sold in circumstances that create a reasonable expectation of profits from the essential managerial or entrepreneurial efforts of others; and

A payment-oriented digital asset designed to maintain stable value relative to a fixed amount of monetary value.

Early-stage projects need clarity on the facts and disclosures that most materially affect that analysis, including asset-reference language, supply controls, governance rights, transfer restrictions, promoter communications, beneficiary programs, market-making arrangements, and the existence or absence of redemption or value-support commitments.

IV. Requested Task Force Considerations

WEE PBC respectfully recommends that the Commission consider:

Pre-launch guidance. Publish a practical, non-exclusive checklist of facts that developers should disclose and evaluate before issuing a digital asset, including functional status, transferability, market availability, promotional statements, governance concentration, redemption features, liquidity support, and planned use of proceeds.

Asset-reference versus investment entitlement. Clarify that reference to independently verified real-world data or assets does not alone establish an investment contract; the analysis should remain focused on the economic reality of the transaction, including whether purchasers receive an enforceable financial claim, expect profits from another party's essential managerial efforts, or are promised liquidity, appreciation, or return.

Benefit-program analysis. Explain how a broad-based, independently determined beneficiary program should be evaluated when it is not conditioned on purchasing, holding, staking, transferring, or promoting the related digital instrument.

Communications safe practices. Identify language and practices that raise concern—such as promises of price appreciation, yield, fixed-value redemption, liquidity support, or market-development commitments—and contrast them with legally neutral descriptions of technical, accounting, provenance, or verification functions.

Coordinated classifications. Continue coordination with Treasury, FinCEN, the CFTC, and state regulators so that innovators can seek coherent guidance on securities, commodities, payments, money-transmission, sanctions, and stablecoin questions before launching a product.

V. Public-Interest Rationale

Natural-capital verification and environmental data systems can help improve the integrity, traceability, and accountability of ecological and resource-related claims. However, unclear treatment of early-stage tokenized or digitally recorded systems can push developers toward public experimentation before they understand their legal obligations—or discourage them from building compliant systems at all.

A transparent pre-launch framework would advance investor protection and market integrity by encouraging developers to pause issuance, retain qualified counsel, disclose uncertainty, and build legal and technical controls before assets reach the public.

VI. Closing

WEE PBC appreciates the Crypto Task Force's willingness to receive written input and engage market participants. WEE PBC is committed to seeking qualified legal guidance and satisfying all applicable requirements before any ETC issuance, offering, distribution, or operational launch.

Respectfully submitted,

Brian James Heaton

Founder, President, and Chairperson

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