

UNITED STATES OF AMERICA
Before the
SECURITIES AND EXCHANGE COMMISSION

INVESTMENT ADVISERS ACT OF 1940
Release No. 5501 / May 12, 2020

ADMINISTRATIVE PROCEEDING
File No. 3-19795

RESPONDENT'S ANSWER

In the Matter of

STACY L. BEANE,

RESPONDENT.

ANSWER OF STACY L. BEANE

Respondent, STACY L. BEANE, within the time provided by law, files this Answer to the Commission's initiation of administrative proceedings as follows:

1. Respondent was served with the Commission's Complaint and does not challenge proper service.
2. Respondent acknowledges that an Injunction was entered in the District Court for the Eastern District of North Carolina in Civil Case No. 5:20-CV-95.
3. The heading in § B of the Commission's Complaint suggests that there was a Criminal Conviction in this case. This allegation is denied. Ms. Beane has never been charged with a crime and has not been convicted of a crime.
4. The Respondent attaches, as an Exhibit to the Answer, the Respondent's declaration in the related District Court case which recites the background of this case and the reason why any remedial action is not necessary or in the public interest. Respondent will be prepared to submit sworn

testimony, or to appear in person before a hearing officer to further explain why remedial action is not appropriate in this case.

RESPECTFULLY SUBMITTED,

GARLAND, SAMUEL & LOEB, P.C.

/s/ Donald F. Samuel

DONALD F. SAMUEL

Ga. Bar # 624475

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IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION

Case No. 5:20-cv-95-D

Securities and Exchange Commission,)
)
Plaintiff,)
)
v.)
)
Stacy L. Beane and Travis Laska,)
)
Defendants.)

DECLARATION IN SUPPORT OF REDUCED CIVIL PENALTY

I, Stacy Beane, file this declaration in support of the motion pending in this case, to set a minimal monetary penalty.

1. Both Travis Laska and I were working at Visionquest ("VQ") in 2016. I started working at VQ when I was 26 years old.
2. In the fall of 2016, the SEC audit began what led Peters to demand that I forge documents and create false documents to hide his Ponzi scheme (I did not know his reason, at the time, for demanding that I change the documents). Mr. Peters was abusive and threatening to me, as reflected in the trial testimony. Previously, I had been sexually

assaulted by Mr. Peters. I testified that I did what Mr. Peters directed me to do and I knew that it was wrong to do so. There are some mitigating circumstances, however: some of the “forged” documents were re-creations of documents that actually existed but could not be located in the files (such as documents signed by investors that they were accredited). This is not an excuse or a denial of my guilt, but reflect the way in which I initially rationalized what I was doing.

3. I recognized that the falsification of documents was deceptive and fraudulent, and in early 2017 Mr. Laska and I sought the assistance of a lawyer in Florida, Paul Calli (who is prepared to testify).
4. I did not receive any money from any victim as a result of my actions. For that reason, there is no disgorgement that the SEC is seeking from me.
5. After consulting with counsel, I went to the FBI (not the SEC) to report what Peters was doing during the course of the ongoing SEC audit.

6.

[REDACTED]

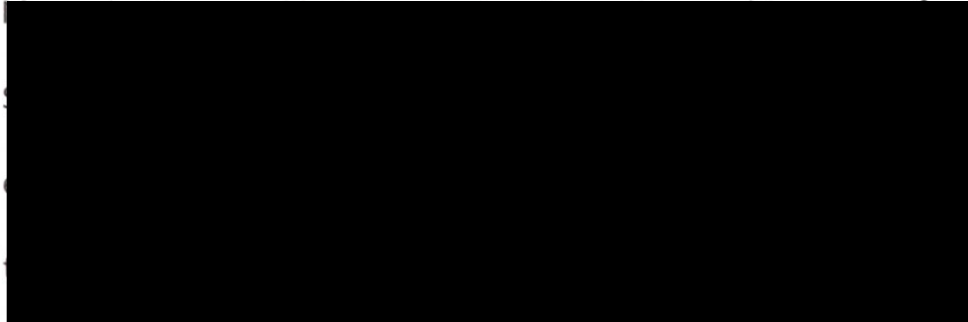
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[REDACTED]



7. For the next several months, I kept track of all the documents that Peters insisted that we fabricate or alter and we also taped the conspiratorial meetings. It is my belief that the SEC was not aware that Peters was forging documents (or directing others to do so) or altering documents during the course of the audit.
8. Shortly before Peters was arrested, I moved to Florida, because I was scared of Mr. Peters, who had been released on bond. I eventually went to work with a new company.
9. I began earning money and became self-sufficient. In March of this year, the SEC filed the lawsuit that is now pending in this court. I promptly admitted the allegations in the complaint and agreed to the entry of a permanent injunction.
10. I was fired from my job when this lawsuit was publicized in the local newspapers.

11. I do not own [REDACTED] or any other assets with which to pay a penalty.



I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 15, 2020.

A handwritten signature in black ink, appearing to read 'Stacy Beane', is written over a horizontal line. The signature is stylized and cursive.

Stacy Beane