

UNITED STATES OF AMERICA  
Before the  
SECURITIES AND EXCHANGE COMMISSION

INVESTMENT ADVISERS ACT OF 1940  
Release No. 5502 / May 12, 2020

ADMINISTRATIVE PROCEEDING  
File No. 3-19796

RESPONDENT'S ANSWER

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In the Matter of

TRAVIS LASKA,

RESPONDENT.

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ANSWER OF TRAVIS LASKA

Respondent, TRAVIS LASKA, 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. Mr. Laska 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, Travis Laska, file this declaration in support of the motion pending in this case, to set a minimal monetary penalty.

1. Both Ms. Beane and I were working at Visionquest (“VQ”) in 2016. Ms. Beane had started working at VQ when she was 26 years old and I began work upon graduating from college, though I had interned at the company before graduating. I started working there when I was 21 years old. I am now 26 years old.
2. In the fall of 2016, the SEC audit began that led Peters to demand that the I forge documents and create false documents to hide his

Ponzi scheme. At first, I did not know why we were being ordered to alter documents, but realized in early 2017 that Mr. Peters was ordering us to do this in his effort to deceive the SEC. Mr. Peters was abusive and threatening to Ms. Beane and me, as reflected in the trial testimony. Both Ms. Beane and I testified that we did what Mr. Peters directed us to do and we 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). Some information on spreadsheets that were provided to the SEC had information that was not visible on the spreadsheet, but this was information that was not requested in the audit. These are not excuses or denials of my guilt, but reflect the way in which I initially rationalized what I was doing.

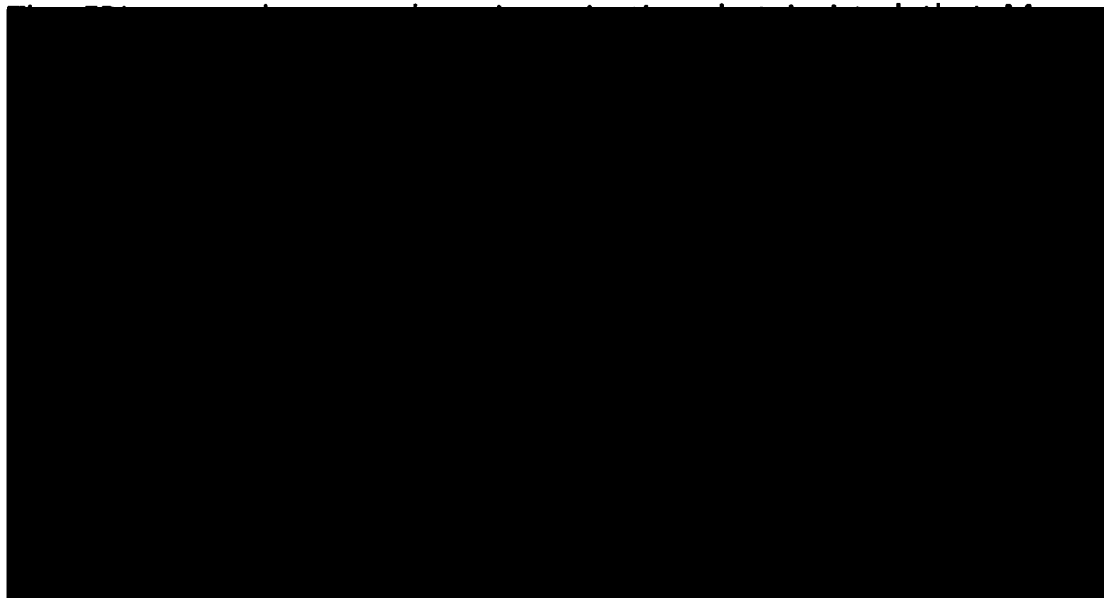
3. I recognized that the falsification of documents was deceptive and fraudulent, and in early 2017 Ms. Beane and I sought the assistance of a lawyer in Florida, Paul Calli (who is prepared to testify).

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.

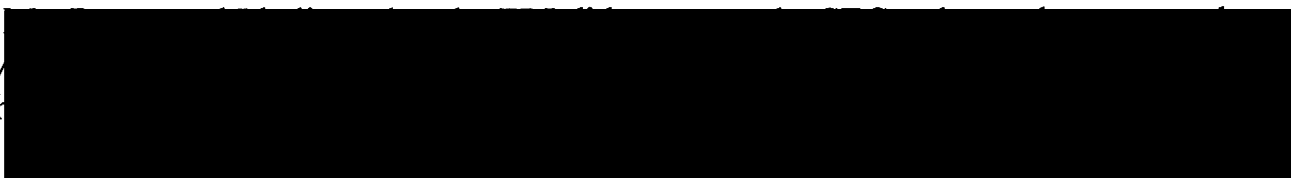
6.



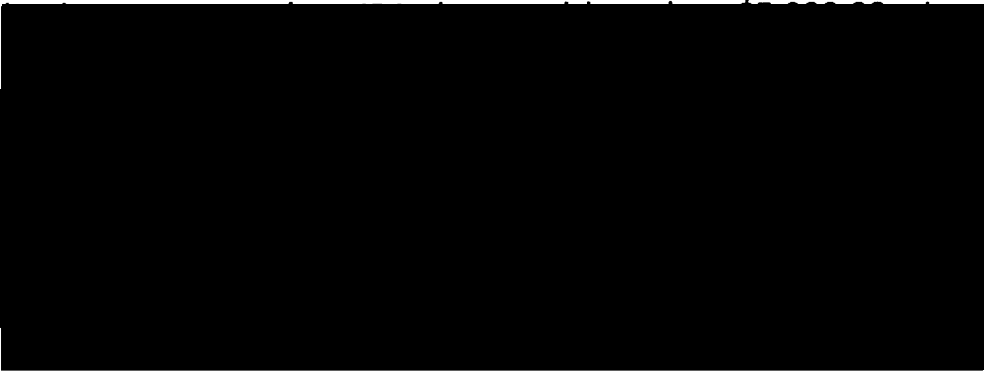
7. For the next several months, Ms. Beane and I kept track of all the documents that Peters insist that we fabricate or alter and we also taped the conspiratorial meetings. It is my belief that the SEC was not aware that Peters was forging documents (or directing others to do

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so) or altering documents during the course of the audit. I also made a hard copy of the emails that were archived and provided that to the FBI so that it could be compared with the altered version of the archived emails that Peters late sent to the SEC.

8. After Peters was arrested, I went to work with a new company and made little or no money for the first year. I provided service to some former VQ clients for no fee.
9. Eventually, 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. Both Ms. Beane and I promptly admitted the allegations in the complaint and agreed to the entry of a permanent injunction.
10. We were both fired from our jobs when this lawsuit was publicized in the local newspapers.
11. I have 

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

6/15/20

Executed on (date).

A handwritten signature in black ink, appearing to read 'Travis Laska', written over a horizontal line.

Travis Laska