

**BEFORE THE ARKANSAS SECURITIES COMMISSIONER
CASE NO. S-23-0039
ORDER NO. S-23-0039-23-OR01**

IN THE MATTER OF:

THOMAS EDWARD STANTON

APPLICANT

ORDER APPROVING LIMITED AGENT REGISTRATION

This Order is entered pursuant to the Arkansas Securities Act, codified at Ark. Code Ann. §§ 23-42-101 through 23-42-509 (“Act”), the Rules of the Arkansas Securities Commissioner (“Rules”) promulgated under the Act, and the Arkansas Administrative Procedures Act, codified at Ark. Code Ann. §§ 25-15-101 through 25-15-221.

FINDINGS OF FACT

1. On December 6, 2023, Thomas Edward Stanton (“Stanton”) submitted an application to become a registered agent of the issuer Wesleyan Impact Partners (“the Issuer”).
2. Stanton, as an officer, director, or employee of the Issuer, petitioned the Arkansas Securities Commissioner (“Commissioner”) to waive the Securities Industry Essential Examination (“SIE Exam”) and the specialized knowledge examination requirements for his registration as an agent of the Issuer. Stanton executed an affidavit attesting to the facts in this Order attached hereto as Exhibit A.
3. On July 17, 2023, Stanton passed the Series 63 Uniform Securities Agent State Law Exam.
4. Stanton has never been registered with the Arkansas Securities Department in any capacity.
5. The Issuer is a church extension fund and a charitable organization pursuant to Section 501(c)(3) of the Internal Revenue Code.

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6. Stanton, as an officer, director, or other employee of the Issuer, performs significant functions for the Issuer other than effecting or attempting to effect the sale of securities.

7. Stanton represents only the Issuer in effecting or attempting to effect sales of securities and will offer and sell only securities issued by the Issuer.

8. Stanton will sell securities offered by the Issuer to a limited class of investors in connection with a church extension fund.

9. Stanton will receive no compensation or similar remuneration either directly or indirectly in connection with the offer and sale of the Issuer's securities.

CONCLUSIONS OF LAW

10. Pursuant to Ark. Code Ann. § 23-42-302(a)(2), the Commissioner may by order approve a limited agent registration with such limitations, qualifications, or conditions as the Commissioner deems appropriate.

11. In order to be registered as an agent, Rule 302.01(c)(1) of the Rules requires that an agent pass the SIE Exam and a specialized knowledge exam appropriate to their job function. Agent applicants must also pass the Series 63 or Series 66 exam that addresses state law.

12. Pursuant to Rule 302.01(c)(6) of the Rules, the Commissioner may waive any or all of the examination requirements required for registration of an agent of the issuer based upon the limited time, amount, or nature of the issue or transaction involved.

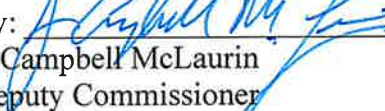
13. Based upon the representations made by Stanton, it is appropriate to waive the SIE Exam and specialized knowledge exam requirements and approve a limited registration as an agent of the issuer.

ORDER

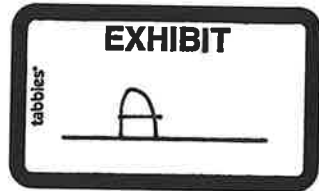
IT IS THEREFORE ORDERED that the application of Thomas Edward Stanton for registration as an agent of Wesleyan Impact Partners is hereby approved as a limited registration provided that Stanton only represent Wesleyan Impact Partners in effecting or attempting to effect sales of securities and that he is not and will not be compensated in connection with the offer and sale of Wesleyan Impact Partners securities by the payment of commissions or other remuneration that is based on transactions in securities. The limited registration is effective until December 31, 2024, unless properly renewed.

WITNESS MY HAND this the 15th day of December, 2023.

SUSANNAH T. MARSHALL
ARKANSAS SECURITIES COMMISSIONER

By: 

J. Campbell McLaurin
Deputy Commissioner
Arkansas Securities Department
1 Commerce Way, Suite 402
Little Rock, Arkansas 72202



BEFORE THE ARKANSAS SECURITIES COMMISSIONER

IN THE MATTER OF:

THOMAS EDWARD STANTON, Applicant

AFFIDAVIT

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BEFORE ME, the undersigned authority, on this day personally appeared THOMAS EDWARD STANTON who, being of sound mind and legal age, and after being duly sworn, deposes and states as follows:

1. I, THOMAS EDWARD STANTON, of Austin, TX petition the Arkansas Securities Commissioner to waive the Securities Industry Essential examination requirement (also known as the SIE) and the specialized knowledge examination requirements for my registration as an agent of Wesleyan Impact Partners. (“**WI Partners**”).

2. On July 17, 2023, I passed the Series 63 Uniform State Law Examination.

3. Since 1987, I have been a practicing attorney in the State of Texas.

4. Since September 2, 2014, I have served as General Counsel with the Texas Methodist Foundation, an affiliate of WI Partners, providing general corporate and securities legal counsel for Texas Methodist Foundation.

5. Since January 1, 2017, I have been employed as General Counsel with WI Partners, providing general corporate and securities counsel for WI Partners and perform significant functions for WI Partners other than effecting or attempting to effect sales of securities.

6. Since January 1, 2018, I have served as the Corporate Secretary of WI Partners and perform significant functions for WI Partners other than effecting or attempting to effect sales of securities.

7. WI Partners is a church extension fund and a charitable organization pursuant to Section 501(c)(3) of the Internal Revenue Code.


8. I represent only WI Partners in effecting or attempting to effect sales of securities and will offer and sell only securities issued by WI Partners.

9. I will only sell securities to a limited class of investors in connection with this church extension fund.

10. I will receive no commissions or similar remuneration either directly or indirectly in connection with the offer and sale of WI Partners' securities.

11. I swear and affirm that I know the contents of this affidavit signed by me and that the statements are true and correct.

Dated this 28th day of November, 2023.



Thomas Edward Stanton

State of Texas)

County of Travis)

SUBSCRIBED AND SWORN TO before me, a Notary Public, on this 28 day of 2023, 2023.



NOTARY PUBLIC

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My Commission Expires: 02/21/2027

County of Residence: Travis