

DENISE VOIGT CRAWFORD
SECURITIES COMMISSIONER

DON A. RASCHKE
DEPUTY SECURITIES COMMISSIONER

Mail: P.O. BOX 13167
AUSTIN, TEXAS 78711-3167

Phone: (512) 3058300
Facsimile: (512) 305-8310



Texas State Securities Board

208 E. 10th Street, 5th Floor
Austin, Texas 78701-2407
www.ssb.state.tx.us

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IN THE MATTER OF THE APPLICATION
FOR INVESTMENT ADVISER REPRESENTATIVE
REGISTRATION OF
NILEY MONROE CHURCH

Order No. IC06-CEN-37

TO: Niley Monroe Church (CRD No. 1911219)
Sentry Management, Inc.
5 Eureka Circle, Suite E
Wichita Falls, TX 76308-2900

DISCIPLINARY ORDER

Be it remembered that Niley Monroe Church ("Respondent"), appeared before the Securities Commissioner of the State of Texas ("Securities Commissioner") and consented to the entry of this order ("Order") and the Findings of Fact and the Conclusions of Law contained herein.

FINDINGS OF FACT

1. Respondent has waived (a) Respondent's right to notice and hearing in this matter; (b) Respondent's right to appear and present evidence in this matter; (c) Respondent's right to appeal this Order; and (d) all other procedural rights granted to Respondent by The Securities Act, TEX. REV. CIV. STAT. ANN. art. 581-1 et seq. (Vernon 1964 & Supp. 2005) ("Texas Securities Act") and the Administrative Procedure Act, TEX. GOV'T CODE ANN. § 2001.001 et seq. (Vernon 2000 & Supp. 2005) ("Administrative Procedure Act").
2. From on or about December 3, 1990 to the present, Sentry Management, Inc. ("Sentry Management") has been registered under the Investment Advisers Act of 1940 with the U. S. Securities and Exchange Commission as an investment adviser, and is a federal covered investment adviser.
3. From on or about December 10, 1990 to the present, Sentry Management has been notice-filed with the Securities Commissioner.
4. From on or about November 16, 1995 to on or about December 31, 2002, Respondent was registered with the Securities Commissioner as an investment adviser representative for Sentry Management.

5. Pursuant to §116.2(f)(3) of the Rules and Regulations of the Texas State Securities Board ("Board Rules") as in effect on March 6, 2002, all persons seeking registration with the Securities Commissioner as an investment adviser representative were required to file the Uniform Application for Securities Industry Registration or Transfer ("Form U-4") via the electronic filing system maintained by the National Association of Securities Dealers, Inc. ("NASD").
6. As of December 31, 2002, Respondent had not filed his electronic Form U-4 application with the Securities Commissioner as an investment adviser representative, and did not transition onto the electronic filing system maintained by the NASD.
7. From on or about January 1, 2003 to the present, Respondent was not registered with the Securities Commissioner as an investment adviser representative.
8. On or about June 5, 2006, Respondent filed an application for registration with the Securities Commissioner as an investment adviser representative for Sentry Management, which is currently pending.
9. Pursuant to Section 12.6 of the Texas Securities Act and §116.1(b)(1)(A) of the Board Rules, any person employed, appointed or authorized by an investment adviser to act or render services for compensation as an investment adviser representative for such investment adviser in this state must first be registered as an investment adviser representative for such investment adviser, notice-filed or otherwise exempt.
10. From on or about January 1, 2003 to the present, Respondent provided investment advice to Sentry Management clients in Texas for compensation.
- 1 1 Pursuant to Section 14.A(6) of the Texas Securities Act, the Securities Commissioner may reprimand a registered investment adviser representative, if the investment adviser representative has violated any provision of the Texas Securities Act or the Board Rules.

CONCLUSIONS OF LAW

- 1 From on or about January 1, 2003 to the present, Respondent rendered services in Texas as an "investment adviser representative" as that term is defined by Section 4.P of the Texas Securities Act.
2. From on or about January 1, 2003 to the present, Respondent rendered services as an investment adviser representative for Sentry Management in violation of Section 12.B of the Texas Securities Act and § 116.1(b)(1)(A) of the Board Rules.
3. Pursuant to Section 14.A(6) of the Texas Securities Act, the foregoing violations constitute bases for the issuance of an order reprimanding a registered investment adviser representative.

ORDER

1. It is therefore ORDERED that the registration of Niley Monroe Church as an investment adviser representative for Sentry Management, Inc. is hereby GRANTED.
2. It is further ORDERED that Niley Monroe Church is hereby REPRIMANDED.

SIGNED AND ENTERED BY THE SECURITIES COMMISSIONER this 18th
day of August, 2006. ^{Deputy}

DENISE VOIGT CRAWFORD
Securities Commissioner


Deputy Securities Commissioner

Respondent:



Niley Monroe Church

Approved as to Form:

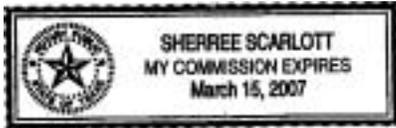


Benette L. Zivley
Director
Inspections and Compliance Division

ACKNOWLEDGMENT

On the 15th day of August, 2006, Niley Monroe Church ("Respondent") personally appeared before me, executed the foregoing Order, and acknowledged that:

- 1 Respondent has read the foregoing Order;
2. Respondent has been fully advised of his rights under the Texas Securities Act and the Administrative Procedure Act;
3. Respondent knowingly and voluntarily consents to the entry of the foregoing Order, and the Findings of Fact and Conclusions of Law contained therein; and
4. Respondent, by consenting to the entry of the foregoing Order, has knowingly and voluntarily waived his rights as set forth therein.



[affix notary seal here]

Sherree Scarlott
Notary Public in and for
The State of Texas

My commission expires on: 3-15-07