

UNITED STATES OF AMERICA  
Before the  
SECURITIES AND EXCHANGE COMMISSION  
Washington, D.C. 20549

ADMINISTRATIVE PROCEEDINGS RULINGS  
Release No. 2480/April 1, 2015

ADMINISTRATIVE PROCEEDING  
File No. 3-16337

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In the Matter of :  
:   
BRENT F. WILLIAMS : PREHEARING ORDER

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The Securities and Exchange Commission instituted this proceeding with an Order Instituting Proceedings (OIP) on January 13, 2015, pursuant to Section 203(f) of the Investment Advisers Act of 1940. The proceeding is a follow-on proceeding based on *United States v. Williams*, No. 2:09-cr-01492 (D. Ariz. June 28, 2013), *appeal docketed*, No. 13-10529 (9th Cir. Oct. 11, 2013), in which Respondent Brent F. Williams (Williams) was convicted of mail fraud, wire fraud, conspiracy to commit mail and wire fraud, and money laundering, in violation of 18 U.S.C. §§ 1341, 1343, 1349, and 1957(a). A prehearing conference was held yesterday. Spencer E. Bendell and Melissia Buckhalter-Honore appeared on behalf of the Division of Enforcement (Division), and Williams appeared *pro se*.

Williams has filed his Answer to the OIP. The Division will forward its investigative file to the facility at which he is incarcerated by April 14, 2015.<sup>1</sup> The Division was granted leave to file a motion for summary disposition pursuant to 17 C.F.R. § 201.250, which will be due by April 28, 2015. Williams may file an opposition by June 30, 2015, and the Division, a reply, by July 10, 2015.

IT IS SO ORDERED.

S/ Carol Fox Foelak  
Carol Fox Foelak  
Administrative Law Judge

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<sup>1</sup> See *Byron S. Rainer*, Exchange Act Release No. 59040, 2008 SEC LEXIS 2840, at \*7 (Dec. 2, 2008); *José P. Zollino*, Exchange Act Release No. 51632, 2005 SEC LEXIS 987, at \*10 (Apr. 29, 2005).