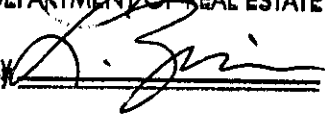


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FILED
AUG 25 2011

DEPARTMENT OF REAL ESTATE

By 

8 BEFORE THE DEPARTMENT OF REAL ESTATE
9 STATE OF CALIFORNIA

10 * * *

11 In the Matter of the Accusation of)
12) H-4233 SD
13 BEST FINANCIAL CONSULTANTS,)
14 ANDRE WILLIAMS,) ACCUSATION
15 BENJAMIN RENE WILLIAMS and)
16 WILLIAM RAWSON WYCKOFF,)
17 Respondents.)

17 The Complainant, Joseph Aiu, a Deputy Real Estate Commissioner of
18 the State of California, for cause of Accusation against BEST FINANCIAL CONSULTANTS
19 (hereinafter "BFC"), ANDRE WILLIAMS ("WILLIAMS"), BENJAMIN RENE WILLIAMS
20 ("BENJAMIN") and WILLIAM RAWSON WYCKOFF (hereinafter "WYCKOFF")
21 (collectively referred to as "Respondents"), is informed and alleges as follows:

22 1

23 Complainant makes this Accusation against Respondents in his official capacity.

24 2

25 Respondents are presently licensed and/or have license rights under the Real
26 Estate Law, Part 1 of Division 4 of the Business and Professions Code (hereinafter "Code").

27 ///

1 3

2 At all times herein mentioned, Respondent BFC was and now is licensed by the
3 State of California Department of Real Estate (hereinafter the "Department") as a corporate real
4 estate broker by and through Respondent WILLIAMS as designated officer-broker of Respondent
5 BFC to qualify said corporation and to act for said corporation as a real estate broker.

6 4

7 At all times herein mentioned, Respondent WILLIAMS was and now is licensed
8 by the Department as a real estate broker, individually and as designated officer-broker of
9 Respondent BFC. As said designated officer-broker, Respondent WILLIAMS was at all times
10 mentioned herein responsible pursuant to Section 10159.2 of the Code for the supervision of the
11 activities of the officers, agents, real estate licensees and employees of Respondent BFC for
12 which a license is required.

13 5

14 At all times herein mentioned, Respondents engaged in the business of, acted in
15 the capacity of, advertised, or assumed to act as real estate brokers within the meaning of
16 Section 10131(a) of the Code, including the operation and conduct of a real estate sales business
17 with the public wherein, on behalf of others, for compensation or in expectation of
18 compensation, Respondents sold or offered to sell, bought or offered to buy, solicited
19 prospective sellers or purchasers of, solicited or obtained listings of, or negotiated the purchase,
20 sale or exchange of real property or a business opportunity.

21 6

22 At all times herein mentioned, Respondent BENJAMIN was and is licensed by the
23 Department as a real estate salesperson.

24 7

25 At all times herein mentioned, Respondent WYCKOFF was and is licensed by the
26 Department as a real estate salesperson.

27 ///

On approximately April 24, 2009, in the Superior Court of the State of California, County of San Diego, Case No. 37-2007-00071738-CU-OR-CTL, a civil matter, a final judgment based upon clear and convincing evidence was entered against Respondents based on grounds of fraud, misrepresentation or deceit with reference to a transaction for which a real estate license is required.

On approximately December 17, 2010, the California Court of Appeals, Fourth Appellate District, Case No. D055522, affirmed the judgment alleged above in Paragraph 8.

The facts alleged in Paragraph 8, above, constitute cause under Section 10177.5 (Fraud, Misrepresentation or Deceit Judgment against Licensee in Civil Action) of the Code for the revocation of Respondents' licenses under the Real Estate Law.

WHEREFORE, Complainant prays that a hearing be conducted on the allegations of this Accusation and that upon proof thereof, a Decision be rendered imposing disciplinary action against all licenses and license rights of Respondents under the Code, and for such other and further relief as may be proper under provisions of law.

JOSEPH AIU

Deputy Real Estate Commissioner

Dated at San Diego, California,
this 24 day of August, 2011.