

1 2. SNEVA operated under the trade name "SNEVA ALLIANCE," a DBA registered with the
2 Arizona Secretary of State.

3 3. On November 22, 2005, a Decree of Legal Separation was entered by consent between
4 SNEVA and her husband, Jan J. Sneva, in Maricopa County, case number FN2005-004032.

5 4. The Universal lease was designed, promoted and operated by Yucatan Resorts, Inc.
6 ("Yucatan"), along with Yucatan Resorts, S.A. ("Yucatan-S.A.") and involved investments in hotel
7 units in Cancun, Mexico and other Central American locales from approximately March 2000 to
8 December 2002.

9 5. Resort Holdings International, Inc. ("RHI") and Resort Holding International, S.A. ("RHI-
10 S.A.") began replacing Yucatan as the primary promoter and operator of the Universal lease
11 timeshare program within the State of Arizona in or around May 2002.

12 6. From approximately March 2000 to May 2003 Yucatan and RHI sold the Universal lease to
13 Arizona investors through agents such as insurance sales people.

14 7. From approximately 2002 to 2003, SNEVA through Sneva Alliance, offered and sold
15 unregistered securities in the form of investment contracts to approximately twenty Arizona
16 investors. The principal amount of the investment contracts purchased, in the form of Universal
17 leases, exceeded \$1,055,000.

18 8. Yucatan and RHI paid SNEVA a total of \$100,282.20 in sales commissions for sales made
19 to Arizona investors by SNEVA. This amount does not include commissions earned by SNEVA on
20 sales to her or her husband at the time, Jan J. Sneva.

21 **II. CONCLUSIONS OF LAW**

22 1. The Commission has jurisdiction over this matter pursuant to Article XV of the
23 Arizona Constitution and the Securities Act.

24 2. SNEVA offered or sold securities within or from Arizona, within the meaning of
25 A.R.S. §§ 44-1801(15), 44-1801(21), and 44-1801(26).

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1 IT IS FURTHER ORDERED, pursuant to A.R.S. § 44-2036, that RESPONDENTS shall,
2 jointly and severally pay an administrative penalty in the amount of \$15,000.

3 The payment obligations for these administrative penalties shall be subordinate to any
4 Disgorgement obligations ordered herein and shall become immediately due and payable only after
5 Disgorgement payments have been paid in full or upon RESPONDENTS' default with respect of
6 Disgorgement obligations.

7 Any amount outstanding shall accrue interest at the rate of 10% per annum from the date of
8 this Order until paid in full.

9 Payments shall be made by cashier's check or money order payable to the "State of
10 Arizona" to be placed in an interest bearing account maintained and controlled by the Commission.
11 Upon receipt, the Commission shall disburse the Disgorgement funds on a pro rata basis to all
12 known investors shown on the records of the Commission who acquired their Universal lease
13 through SNEVA or SNEVA ALLIANCE as a result of SNEVA's sales activities. Any
14 Disgorgement funds that the Commission cannot disburse because an investor refuses to accept
15 such payment shall be disbursed on a pro-rata basis to the remaining investors shown on the
16 records of the Commission. Any Disgorgement funds that the Commission determines it is unable
17 to or cannot feasibly disburse shall be transferred to the General Fund of the State of Arizona.

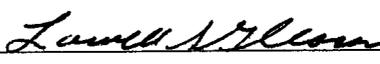
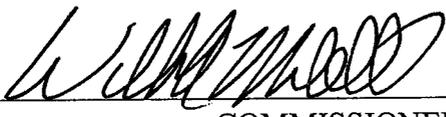
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For purposes of this Order, a bankruptcy filing by any of the RESPONDENTS shall be an act of default. If any Respondent does not comply with this Order, any outstanding balance may be deemed in default and shall be immediately due and payable.

IT IS FURTHER ORDERED that this Order shall become effective immediately.

BY ORDER OF THE ARIZONA CORPORATION COMMISSION

		
CHAIRMAN	COMMISSIONER	
		
COMMISSIONER	COMMISSIONER	COMMISSIONER

IN WITNESS WHEREOF, I, BRIAN C. McNEIL, Executive Director of the Arizona Corporation Commission, have hereunto set my hand and caused the official seal of the Commission to be affixed at the Capitol, in the City of Phoenix, this 6th day of June, 2007.


BRIAN C. McNEIL
Executive Director

DISSENT

DISSENT

This document is available in alternative formats by contacting Linda Hogan, Executive Assistant to the Executive Director, voice phone number 602-542-3931, E-mail lhogan@azcc.gov.

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CONSENT TO ENTRY OF ORDER

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2 1. Respondents JANALEE RANNEY SNEVA DBA SNEVA ALLIANCE
3 (“RESPONDENTS”) admit the jurisdiction of the Commission over the subject matter of this
4 proceeding. RESPONDENTS acknowledges that they have been fully advised of their right to a
5 hearing to present evidence and call witnesses and RESPONDENTS knowingly and voluntarily
6 waive any and all rights to a hearing before the Commission and all other rights otherwise
7 available under Article 11 of the Securities Act and Title 14 of the Arizona Administrative Code.
8 RESPONDENTS acknowledge that this Order To Cease and Desist, Order of Disgorgement, Order
9 for Administrative Penalties and Consent to Same (“Order”) constitutes a valid final order of the
10 Commission.

11 2. RESPONDENTS knowingly and voluntarily waive any right under Article 12 of the
12 Securities Act to judicial review by any court by way of suit, appeal, or extraordinary relief
13 resulting from the entry of this Order.

14 3. RESPONDENTS acknowledge and agree that this Order is entered into freely and
15 voluntarily and that no promise was made or coercion used to induce such entry.

16 4. RESPONDENTS acknowledge that they have been represented by an attorney in
17 this matter, that they have reviewed this Order with their attorney, Sherman D. Fogel, and
18 understand all terms it contains.

19 5. RESPONDENTS neither admit nor deny the Findings of Fact and Conclusions of
20 Law contained in this Order.

21 6. By consenting to the entry of this Order, RESPONDENTS agree not to take
22 any action or to make, or permit to be made, any public statement denying, directly or indirectly,
23 any Finding of Fact or Conclusion of Law in this Order or creating the impression that this Order
24 is without factual basis. Notwithstanding the foregoing, this Order is not intended to collaterally
25 estop, factually bind or preclude the RESPONDENTS from defending themselves in any
26 administrative, civil or criminal proceedings to which the Commission is not a party, including, to

1 the extent allowed by law, being permitted to fully explain the facts and potential mitigating
2 circumstances surrounding RESPONDENTS involvement in the sale of the Universal lease.

3 RESPONDENTS will undertake steps necessary to assure that all of their agents and employees
4 understand and comply with this agreement.

5 7. While this Order settles this administrative matter between RESPONDENTS and
6 the Commission and all claims of the Commission against RESPONDENTS arising out of
7 RESPONDENTS' sales of the Universal lease within or from the State of Arizona,
8 RESPONDENTS understand that this Order does not preclude the Commission from instituting
9 other administrative or civil proceedings based on violations that are not addressed by this Order.

10 8. RESPONDENTS understand that this Order does not preclude the Commission
11 from referring this matter to any governmental agency for administrative, civil, or criminal
12 proceedings that may be related to the matters addressed by this Order.

13 9. RESPONDENTS understand that this Order does not preclude any other agency or
14 officer of the State of Arizona or its subdivisions from instituting administrative, civil, or criminal
15 proceedings that may be related to matters addressed by this Order.

16 10. RESPONDENTS agree that they will not apply to the state of Arizona for
17 registration under the Securities Act of Arizona or under the Arizona Investment Management Act
18 for at least one year from the entry date of this Order *and* until such time as each of them as
19 complied with all terms and conditions of this Order, including the payment in full of all
20 Disgorgement amounts and administrative penalties promulgated under this Order.

21 11. RESPONDENTS agree that they will not exercise any control over any entity that
22 offers or sells securities or provides investment advisory services within or from Arizona until
23 such time as all Disgorgement amounts and administrative penalties under this Order are paid in
24 full.

25 12. RESPONDENTS will continue to cooperate with the Securities Division including,
26 but not limited to, providing complete and accurate testimony at any hearing in this matter and

1 cooperating with the state of Arizona in any related investigation or any other matters arising from
2 the activities described in this Order.

3 13. RESPONDENTS consent to the entry of this Order and agree to be fully bound by
4 its terms and conditions.

5 14. RESPONDENTS acknowledge and understand that if they fail to comply with the
6 provisions of the Order and this Consent, the Commission may bring further legal proceedings
7 against them for enforcement of the Order, including application to the superior court for an order
8 of contempt.

9 15. RESPONDENTS agree that until Disgorgement and administrative penalties are
10 paid in full, each of them shall notify the Director of the Securities Division within 30 days of any
11 change in home address or any change in any of their ability to pay amounts due under this Order.

12 16. RESPONDENTS understand that default shall render them liable to the
13 Commission for its costs of collection and interest at the maximum legal rate.

14 17. RESPONDENTS agree and understand that if they fail to make any payment as
15 required in the Order, any outstanding balance shall be in default and shall be immediately due and
16 payable without notice or demand. RESPONDENTS agree and understand that acceptance of any
17 partial or late payment by the Commission is not a waiver of default by the Commission.

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18. In connection with this Order and RESPONDENTS' Consent to Entry of Order, RESPONDENTS have provided to the Commission Janalee Sneva's sworn Statement of Personal Financial Condition and tax returns for 2003-05.

Agreed: Janalee Ranney Sneva
Janalee Ranney Sneva

Agreed: Janalee Ranney Sneva for
Janalee Ranney Sneva for Sneva Alliance
Sneva Alliance

STATE OF ARIZONA)
) ss
County of Maricopa)

SUBSCRIBED AND SWORN TO BEFORE me this 16th day of April, 2007.

[Signature]
NOTARY PUBLIC

My Commission Expires:

