

**UNITED STATES OF AMERICA**  
**Before the**  
**SECURITIES AND EXCHANGE COMMISSION**

**SECURITIES EXCHANGE ACT OF 1934**  
**Release No. 57215 / January 28, 2008**

**ADMINISTRATIVE PROCEEDING**  
**File No. 3-12940**

**In the Matter of**  
  
**CLIFTON CURTIS SNEED, JR.,**  
  
**Respondent.**

**ORDER INSTITUTING**  
**ADMINISTRATIVE PROCEEDINGS**  
**PURSUANT TO SECTION 15(b) OF THE**  
**SECURITIES EXCHANGE ACT OF 1934,**  
**MAKING FINDINGS, AND IMPOSING**  
**REMEDIAL SANCTIONS**

**I.**

The Securities and Exchange Commission (“Commission”) deems it appropriate and in the public interest that public administrative proceedings be, and hereby are, instituted pursuant to Section 15(b) of the Securities Exchange Act of 1934 (“Exchange Act”) against Clifton Curtis Sneed, Jr. (“Sneed” or “Respondent”).

**II.**

In anticipation of the institution of these proceedings, Respondent has submitted an Offer of Settlement (the “Offer”) which the Commission has determined to accept. Solely for the purpose of these proceedings and any other proceedings brought by or on behalf of the Commission, or to which the Commission is a party, and without admitting or denying the findings herein, except as to the Commission’s jurisdiction over him and the subject matter of these proceedings, and the findings contained in Section III.2 below, which are admitted, Respondent consents to the entry of this Order Instituting Administrative Proceedings Pursuant to Section 15(b) of the Securities Exchange Act of 1934, Making Findings, and Imposing Remedial Sanctions (“Order”), as set forth below.

**III.**

On the basis of this Order and Respondent’s Offer, the Commission finds that:

1. Sneed was the managing member and sole owner of Sneed Financial Service, LLC (“SFS”), a Texas limited liability company based in Dallas, Texas. Sneed held himself out as an estate planning and senior investment specialist, and effected transactions in securities for the accounts of others. Sneed used the United States mails and the means and instrumentalities of interstate commerce to effect transactions in and to induce or attempt to induce the purchase of securities. Sneed, 53 years old, is a resident of Dallas, Texas.

2. On January 11, 2008, a final judgment was entered by consent against Sneed, permanently enjoining him from future violations of Sections 5(a), 5(c), and 17(a) of the Securities Act of 1933 (“Securities Act”), and Sections 15(a) and 10(b) of the Exchange Act and Rule 10b-5 thereunder in the civil action entitled Securities and Exchange Commission v. Unlimited Cash, Inc., et al., Civil Action Number 3-06CV0594-K, in the United States District Court for the Northern District of Texas, Dallas Division.

3. The Commission’s complaint alleged that, from June 2003 to at least May 2005, in connection with the sale of unregistered securities in the form of investment contracts in “Ad Toppers,” which were computer monitors displaying advertisements and typically placed on vending machines or similar devices, Sneed made materially false and misleading representations about the safety of the investment and the promised returns, falsely claimed to have extensively investigated the program, and otherwise engaged in a variety of conduct which operated as a fraud and deceit on investors. The complaint also alleged that Sneed sold unregistered securities.

#### IV.

In view of the foregoing, the Commission deems it appropriate and in the public interest to impose the sanctions agreed to in Respondent’s Offer.

Accordingly, it is hereby ORDERED:

Pursuant to Section 15(b)(6) of the Exchange Act, that Respondent Sneed be, and hereby is barred from association with any broker, dealer, or investment adviser.

Any reapplication for association by the Respondent will be subject to the applicable laws and regulations governing the reentry process, and reentry may be conditioned upon a number of factors, including, but not limited to, the satisfaction of any or all of the following: (a) any disgorgement ordered against the Respondent, whether or not the Commission has fully or partially waived payment of such disgorgement; (b) any arbitration award related to the conduct that served as the basis for the Commission order; (c) any self-regulatory organization arbitration award to a customer, whether or not related to the conduct that served as the basis for the Commission order; and (d) any restitution order by a self-regulatory organization, whether or not related to the conduct that served as the basis for the Commission order.

For the Commission, by its Secretary, pursuant to delegated authority.

Nancy M. Morris  
Secretary