

UNITED STATES OF AMERICA
Before the
SECURITIES AND EXCHANGE COMMISSION

SECURITIES EXCHANGE ACT OF 1934
Release No. 76752 / December 23, 2015

ADMINISTRATIVE PROCEEDING
File No. 3-17027

In the Matter of

KEVIN I. ZINN,

Respondent.

**ORDER INSTITUTING ADMINISTRATIVE
PROCEEDINGS PURSUANT TO SECTION
15(b) OF THE SECURITIES EXCHANGE
ACT OF 1934 AND NOTICE OF HEARING**

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 Kevin I. Zinn (“Respondent”).

II.

After an investigation, the Division of Enforcement alleges that:

A. RESPONDENT

1. From May 2011 to approximately March 2013, Respondent acted as an unregistered broker. Specifically, Respondent solicited investors through the phone and other means to make investments in companies that purportedly bought and sold iron ore from Mexico and processed copper and other minerals in Utah. Respondent used several companies to solicit funds from investors: Global Solutions and Acquisitions, LLC, Global Solutions and Acquisitions Management, LLC (“GSAM”), and Consolidated Copper and Metals, Inc. Respondent was the managing member of GSAM. Respondent solicited money from investors by making materially false and fraudulent representations, and by concealing and omitting material facts concerning, among other things, the profitability of the investments offered, and the misappropriation of money

from investors for the benefit of Respondent and his sales people. Specifically, Respondent misrepresented to the investors that their respective funds would be invested in an investment opportunity for a short period of time and would generate profits ranging from 5% to 15%. Furthermore, Respondent misappropriated funds and spent investor money on personal expenses. Respondent hired sales people, gave them leads of people to call and written sales pitches, and paid them for their solicitation efforts. Respondent, 46 years old, is currently incarcerated at the Adams County Correctional Institution in Natchez, Mississippi.

B. ENTRY OF THE RESPONDENT'S CRIMINAL CONVICTION

2. On October 29, 2014, Zinn entered a guilty plea in the United States District Court for the Southern District of Florida to one count of conspiracy to commit mail and wire fraud in violation of Title 18 of the United States Code, Section 1349 in connection with his involvement in an investment scheme that raised approximately \$1.1 million from at least 51 individuals. U.S. v. Kevin I. Zinn, Case No. 0:14CR60213-Cohn-1 (S.D. Fla. Sep. 4, 2014).

3. Count I of the Indictment to which Zinn pled guilty alleged, inter alia, that Zinn, knowingly, and with an intent to defraud, devised and intended to devise, a scheme and artifice to defraud and to obtain money and property by means of materially false and fraudulent pretenses, representations and promises, knowing that they were false and fraudulent when made, and for the purpose of executing such scheme and artifice, knowingly caused to be delivered certain mail matter by the United States Postal Service and any private and commercial interstate carrier, including investors' checks, and certain wire communications in interstate commerce.

4. On January 8, 2015, the United States District Court for the Southern District of Florida entered a personal forfeiture money judgment in the amount of \$1,114,939.00 against Respondent. On January 9, 2015, the Court sentenced Respondent to 63 months in prison and 3 years of supervised release. Respondent also was ordered to pay restitution in the amount of \$920,978.38.

III.

In view of the allegations made by the Division of Enforcement, the Commission deems it necessary and appropriate in the public interest that public administrative proceedings be instituted to determine:

A. Whether the allegations set forth in Section II hereof are true and, in connection therewith, to afford Respondent an opportunity to establish any defenses to such allegations; and

B. What, if any, remedial action is appropriate in the public interest against Respondent pursuant to Section 15(b) of the Exchange Act.

IV.

IT IS ORDERED that a public hearing for the purpose of taking evidence on the questions set forth in Section III hereof shall be convened at a time and place to be fixed, and before an Administrative Law Judge to be designated by further order as provided by Rule 110 of the Commission's Rules of Practice, 17 C.F.R. § 201.110.

IT IS FURTHER ORDERED that Respondent shall file an Answer to the allegations contained in this Order within twenty (20) days after service of this Order, as provided by Rule 220 of the Commission's Rules of Practice, 17 C.F.R. § 201.220.

If Respondent fails to file the directed answer, or fails to appear at a hearing after being duly notified, the Respondent may be deemed in default and the proceedings may be determined against him upon consideration of this Order, the allegations of which may be deemed to be true as provided by Rules 155(a), 220(f), 221(f) and 310 of the Commission's Rules of Practice, 17 C.F.R. §§ 201.155(a), 201.220(f), 201.221(f) and 201.310.

This Order shall be served forthwith upon Respondent as provided for in the Commission's Rules of Practice.

IT IS FURTHER ORDERED that the Administrative Law Judge shall issue an initial decision no later than 210 days from the date of service of this Order, pursuant to Rule 360(a)(2) of the Commission's Rules of Practice.

In the absence of an appropriate waiver, no officer or employee of the Commission engaged in the performance of investigative or prosecuting functions in this or any factually related proceeding will be permitted to participate or advise in the decision of this matter, except as witness or counsel in proceedings held pursuant to notice. Since this proceeding is not "rule making" within the meaning of Section 551 of the Administrative Procedure Act, it is not deemed subject to the provisions of Section 553 delaying the effective date of any final Commission action.

By the Commission.

Brent J. Fields
Secretary