

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

**SECURITIES EXCHANGE ACT OF 1934**  
**Release No. 77485 / March 31, 2016**

**ADMINISTRATIVE PROCEEDING**  
**File No. 3-17027**

**In the Matter of**

**KEVIN I. ZINN,**

**Respondent.**

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

**I.**

On December 23, 2015, the Securities and Exchange Commission (“Commission”) previously instituted public administrative proceedings against Kevin I. Zinn (“Zinn” or “Respondent”) pursuant to Section 15(b) of the Securities Exchange Act of 1934 (“Exchange Act”). The Commission now deems it appropriate and in the public interest to enter this Order Making Findings and Imposing Remedial Sanctions Pursuant to Section 15(b) of the Securities Exchange Act of 1934 (“Order”).

**II.**

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, Respondent admits the Commission’s jurisdiction over him and the subject matter of these proceedings and admits the findings in Sections III.B.2-4 below, and consents to the entry of this Order, as set forth below.

**III.**

On the basis of this Order and Respondent’s Offer, the Commission finds 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 FCI Fort Dix in Joint Base McGuire-Dix-Lakehurst, New Jersey.

## **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.

## **IV.**

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

Accordingly, it is ORDERED pursuant to Section 15(b)(6) of the Exchange Act, that Respondent Zinn be, and hereby is barred from association with any broker, dealer, investment adviser, municipal securities dealer, municipal advisor, transfer agent, or nationally recognized statistical rating organization; and

Pursuant to Section 15(b)(6) of the Exchange Act Respondent Zinn be, and hereby is barred from participating in any offering of a penny stock, including: acting as a promoter, finder, consultant, agent or other person who engages in activities with a broker, dealer or issuer

for purposes of the issuance or trading in any penny stock, or inducing or attempting to induce the purchase or sale of any penny stock.

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.

Brent J. Fields  
Secretary