

STATE OF NEVADA
OFFICE OF THE SECRETARY OF STATE
SECURITIES DIVISION
2250 LAS VEGAS BOULEVARD NORTH, SUITE 400
LAS VEGAS, NEVADA 89030

In the Matter of:

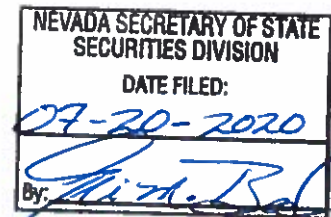
INVESTPRO INVESTMENTS I LLC;
SYMPHONY CITY CENTRE LLC; and
ZHONG LIN, an individual

Respondents

ADMINISTRATIVE CONSENT ORDER

File No. INV18-154

TO: INVESTPRO INVESTMENTS I LLC
SYMPHONY CITY CENTRE LLC
ZHONG LIN (a/k/a Kenny Lin)
3553 S. Valley View Blvd.
Las Vegas, NV 89103



WHEREAS, the Nevada Securities Division (Division) conducted an investigation of the above-listed Respondents;

WHEREAS, Zhong Lin, aka Kenny Lin, is a Nevada resident, and was so at all times relevant to this Administrative Consent Order (Order);

WHEREAS, InvestPro Investments I LLC (InvestPro) and Symphony City Centre LLC (Symphony) are private funds created by Zhong Lin to provide investment opportunities to Zhong Lin's real estate clients;

WHEREAS, the Division's investigation revealed that neither InvestPro nor Symphony were registered with the Division, a violation of the Nevada Uniform Securities Act (Act), in particular NRS § 90.460;

WHEREAS, InvestPro Manager LLC, which is managed by Zhong Lin, and whose members include Zhong Lin and Mandy Cheng, retained membership interests in both funds, and acted as a manager and management services provider to both funds;

WHEREAS, Zhong Lin, of Las Vegas, NV, in his capacity as manager of InvestPro Manager LLC and, thereby, the funds InvestPro and Symphony, and as president of InvestPro

Realty, gave investment advice to at least six (6) persons from his offices in Las Vegas, NV, without being licensed as an investment adviser or a representative of an investment adviser, a violation of NRS § 90.330(1);

WHEREAS, Zhong Lin, through InvestPro Manager LLC, InvestPro and Symphony, took custody of client funds invested by members in InvestPro and Symphony, absent compliance with the safekeeping and independent verification requirements of 17 C.F.R. § 275.206(4)(a)(4), in particular, the annual audit and certificate of accountant requirements, with no applicable exceptions, in violation of NAC § 90.390(1)(b);

WHEREAS, Respondents have advised the Division of their desire to resolve the above failures to comply with the requirements of the Act, on the terms specified within this ORDER;

WHEREAS, the Division's investigation and audit found the following:

- a. Respondent InvestPro began winding up its business during September 2017, had returned all client capital contributions by April 2018, and had paid an average total return to each investor of approximately 14%.
- b. Respondent Symphony is still an open fund, pending the sale of certain properties in Laughlin, NV. Symphony is currently under contract to sell its remaining properties and is preparing to wind up its business.

WHEREAS, all amounts charged to InvestPro and Symphony have been reviewed and are considered legitimate business expenses.

WHEREAS, Respondents elect to permanently and expressly waive any right to a hearing and appeal under the Act and/or to seek judicial review under the Nevada Administrative Procedure Act, NRS Chapter 233B, with respect to this Order.

NOW THEREFORE, the Administrator, pursuant to the Act, hereby enters the following:

ORDER

Finding the following appropriate and in the public interest, and on the basis of the foregoing, and Respondents' consent to the entry of this Order,

IT IS HEREBY ORDERED:

1. Respondents will cease violating the Act and will comply with said Act.
2. Respondents will pay the Nevada Secretary of State a civil penalty in the cumulative amount of Twelve Thousand Five Hundred Dollars and No Cents (\$12,500.00). The payment shall be made in two installments of \$6,250.00. The first installment is due upon the signing of this Order, and the second is due on December 1, 2020.
3. Upon the signing of this Order, Respondents shall submit a check made payable to the Secretary of State in the amount of Two Thousand Eight Hundred Sixty-Nine Dollars and Sixty Cents (\$2,869.60), for its fee for the investigative costs of this matter.
4. All penalties and fees submitted under this Order shall be remitted to:

Nevada Secretary of State
c/o Stacey Roter
2250 Las Vegas Blvd. North, Suite 400
North Las Vegas, NV 89030
5. Prior to distributing investor funds and closing Symphony, Zhong Lin will submit all relevant documents to the Division for review. Zhong Lin will reimburse the Division for costs associated with that review.
6. Respondents will cease performing investment advisory services in Nevada unless and until they become licensed to do so under the Act.
7. Nothing in this Order prohibits Respondents from obtaining a license under the Act to render investment advisory services in this state. Prior to filing any documents relating to licensing with the Division, Respondents will hire an independent consulting firm to ensure that all policies and procedures including, but not limited to, those specifically related to books and records, are being followed and are in compliance with the Act.
8. In consideration of the provisions of this Order, the Division will take no further enforcement action against Respondents based upon the facts and circumstances

covered by this Order and those discovered in the Division's underlying investigation, and will close its administrative investigation of Respondents in connection with the aforementioned activities.

9. Nothing in this Order shall be construed as a waiver of the Division's right to investigate and pursue any violations by Respondents in connection with other activities not set forth herein and not contemplated by this Order.
10. Nothing in this Order is intended to limit or create for third parties any private remedies against Respondents.
11. This Order shall be effective as of the date on which it is signed by the Administrator, as set forth below.

Dated this 20th day of July, 2020.

BY ORDER OF THE ADMINISTRATOR
Nevada Securities Division, Office of the Secretary of State



ERIN M. HOUSTON
Deputy Secretary for Securities
Securities Administrator

CONSENT TO ENTRY OF ADMINISTRATIVE ORDER

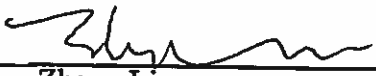
InvestPro Investments I LLC and Symphony City Centre LLC, by and through their authorized representative, Zhong Lin, aka Kenny Lin, and Zhong Lin, individually (collectively, Respondents), hereby acknowledge that they have been served with a copy of this Administrative Consent Order (Order), have read the foregoing Order, are aware of their right to a hearing and appeal in this matter, and have waived the same.

Respondents admit the jurisdiction of the Securities Division, of the Office of the Secretary of State, State of Nevada, and consent to the entry of this Order by the Administrator of the Division as settlement of the issues contained in this Order.

Respondents aver that no promises of any kind or nature, other than the consideration set forth in this Order, have been made to Respondents to induce them to enter into this Order, and that they have entered into this Order voluntarily.

Dated this 8th day of July, 2020.

INVESTPRO INVESTMENTS I LLC
SYMPHONY CITY CENTRE LLC
Zhong Lin

By: 
Zhong Lin
Authorized Representative, and in his
individual capacity