

1 STATE OF CALIFORNIA  
2 BUSINESS, CONSUMER SERVICES AND HOUSING AGENCY  
3 DEPARTMENT OF BUSINESS OVERSIGHT

4 TO: Gateway Financial Group  
5 Petersen Lowe, LLC., also known as PetersenLowe  
6 The Diamond Desk, also known as The Diamond Desk Corporation  
7 The Diamond Market, LLC.  
8 Murray Todd Petersen, also known as Todd Petersen  
9 Adam Lowe  
10 Debra Sue Petersen, Esq.

11 1420 Rocky Ridge Drive Suite 160  
12 Roseville, California 95661

13 19012 SW 55<sup>th</sup> Street  
14 Miramar, Florida 33029

15 4000 Hollywood Blvd., Suite 765-South  
16 Hollywood, Florida 33021

17 3017 Douglas Drive, Suite 105,  
18 Roseville, California 95661

19 **DESIST AND REFRAIN ORDER**

20 **(For violations of sections 25110 and 25401 of the Corporations Code)**

21 The California Commissioner of Business Oversight finds that:

22 1. At all relevant times, Gateway Financial Group (Gateway) is and was a business of  
23 unknown formation doing business at 1420 Rocky Ridge Drive Suite 160, Roseville, California  
24 95661, using telephone number (916) 635-4585 with a website at www.mygfg.com.

25 2. At all relevant times, Petersen Lowe, LLC., also known as PetersenLowe, (PL) is and  
26 was a business of unknown formation also doing business at 1420 Rocky Ridge Drive Suite 160,  
27 Roseville, California 95661, with a website at www.petersenlowe.com.

28 3. At all relevant times, The Diamond Desk, also known as The Diamond Desk  
Corporation, (Diamond Desk) is and was a business of unknown formation doing business also at  
1420 Rocky Ridge Drive Suite 160, Roseville, California 95661, and 19012 SW 55<sup>th</sup> Street, Miramar,  
Florida 33029.

1           4.       At all relevant times, The Diamond Market, LLC. (Market), is and was an inactive  
2 Florida limited liability company doing business at 1420 Rocky Ridge Drive Suite 160, Roseville,  
3 California 95661 and at 4000 Hollywood Blvd., Suite 765-South, Hollywood, Florida 33021.

4           5.       At all relevant times, Murray Todd Petersen, also known as Todd Petersen, (Petersen),  
5 is and was an individual residing in Sacramento County, doing business at 1420 Rocky Ridge Drive  
6 Suite 160, Roseville, California 95661, and 19012 SW 55<sup>th</sup> Street, Miramar, Florida 33029. Petersen  
7 holds a broker-dealer license issued by the Department of Business Oversight on December 13, 2019,  
8 CRD #1311730. Petersen owned and operated Gateway and Diamond Desk. Petersen also was co-  
9 owner and operated PL, with Lowe.

10          6.       At all relevant times, Adam Lowe (Lowe) is and was an individual doing business in  
11 with Petersen at 1420 Rocky Ridge Drive Suite 160, Roseville, California 95661, residing in Florida.  
12 Lowe was the managing member of Market, also doing business at 4000 Hollywood Blvd., Suite  
13 765-South, Hollywood, Florida 33021. Lowe co-owned and operated PL, with Petersen.

14          7.       At all relevant times, Debra Sue Petersen (DS Petersen) is and was an attorney  
15 (California State Bar number 105251) and Petersen's wife, doing business as Petersen Law at 3017  
16 Douglas Drive, Suite 105, Roseville, California 95661, specializing in taxation and estate planning.

17          8.       Beginning in at least 2014, Gateway, PL, Diamond Desk, Market, Petersen, Lowe, and  
18 DS Petersen offered or sold securities in the form of a "Parcel Purchase Program" involving  
19 gemstones-investment contracts in California.

20          9.       At least four California investors purchased a combined \$300,000 worth of "parcels"  
21 of jewelry which purportedly consisted of "high grade" colored diamonds chosen by and through  
22 Gateway, PL, Diamond Desk, Market, Petersen, and Lowe for their investment potential.<sup>1</sup> Investors  
23 did not receive possession of the jewelry, but instead were told that Gateway, PL, Diamond Desk,  
24 Market, Petersen, and Lowe would hold on to them. Gateway, PL, Diamond Desk, Market, Petersen,  
25 and Lowe guaranteed that they would be able to sell the "parcels" on behalf of the investors for at  
26 least a 30% profit within twelve months. To date, investors have not received their profit or  
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<sup>1</sup> In other transactions not involving the parcel program, investors received diamond jewelry that was allegedly subpar in quality with prices based upon an artificially inflated retail value.

1 investment capital back from Gateway, PL, Diamond Desk, Market, Petersen, or Lowe, despite  
2 numerous requests.

3 10. These securities were offered or sold in this state in issuer transactions. The  
4 Department of Business Oversight has not issued a permit or other form of qualification authorizing  
5 Gateway, PL, Diamond Desk, Market, Petersen, Lowe, and DS Petersen or any person to offer or sell  
6 the above described securities, in this state.

7 11. In connection with the offer or sale of these securities in this state, Gateway, PL,  
8 Diamond Desk, Market, Petersen, Lowe, and DS Petersen made untrue statements of material facts,  
9 including but not limited to the following:

10 a. Investors would receive at minimum a 30% profit in addition to their principal  
11 investment within twelve months when the parcels were sold.

12 b. Gateway, PL, Diamond Desk, Market, Petersen, Lowe, and DS Petersen had the  
13 “fastest growing investment opportunity with quick, high returns.”

14 c. The investment was “low risk” and investors could sell their parcels of diamond  
15 jewelry at any time for “fast” liquidation. In fact, despite numerous requests from investors,  
16 Gateway, PL, Diamond Desk, Market, Petersen, and Lowe have not returned any investment  
17 principal or paid out any profits.

18 12. Beginning in at least 2017, DS Petersen referred at least three estate planning clients to  
19 Petersen for the purpose of investing with him, including, but not limited to, investing in the parcel  
20 program. In one case, a young, widowed, unsophisticated, unemployed client hired DS Petersen to  
21 draft a trust for the benefit of her young son. DS Petersen, despite knowing that the widowed client  
22 had requested that any funds they discussed were to be preserved for the daily support and education  
23 of the client’s minor child, referred the widowed client to Petersen for the purpose of investing in the  
24 parcel program. The client gave Gateway, PL, Diamond Desk, Market, Petersen, and Lowe \$100,000  
25 after they promised to select a parcel that they would then sell within twelve months guaranteeing a  
26 30% profit. To date, the client investor has not received her investment capital back or profit from  
27 Petersen, Gateway, PL, Diamond Desk, Market, or Lowe.

28 13. The Commissioner believes that at all relevant times, DS Petersen knowingly provided

1 substantial assistance to Petersen, Gateway, PL, Diamond Desk, Market, or Lowe, either directly or  
2 indirectly, to violate the provisions of the Corporate Securities Law of 1968 within the meaning of  
3 Corporations Code section 25403, subdivisions b and c.

4 Based on the foregoing findings, the Commissioner of Business Oversight is of the opinion  
5 that the investment contracts offered or sold by Gateway Financial Group, Petersen Lowe, LLC., also  
6 known as PetersenLowe, The Diamond Desk, also known as The Diamond Desk Corporation, The  
7 Diamond Market, LLC., Murray Todd Petersen, also known as Todd Petersen, Adam Lowe, and  
8 Debra Sue Petersen, Esq. are securities subject to qualification under the Corporate Securities Law of  
9 1968 and are being or have been offered or sold without first being qualified in violation of  
10 Corporations Code section 25110.

11 Pursuant to Corporations Code section 25532, Gateway Financial Group, Petersen Lowe,  
12 LLC., also known as PetersenLowe, The Diamond Desk, also known as The Diamond Desk  
13 Corporation, The Diamond Market, LLC., Murray Todd Petersen, also known as Todd Petersen,  
14 Adam Lowe, and Debra Sue Petersen, Esq. are ordered to desist and refrain from the further offer and  
15 sale of securities in California, including but not limited to parcel program investment contracts,  
16 unless and until qualification has been made under the Corporate Securities Law of 1968, or unless  
17 exempt.

18 Further, based on the foregoing, the Commissioner of Business Oversight is of the opinion  
19 that the securities in the form of parcel program investment contracts were offered in this state by  
20 Gateway Financial Group, Petersen Lowe, LLC., also known as PetersenLowe, The Diamond Desk,  
21 also known as The Diamond Desk Corporation, The Diamond Market, LLC., Murray Todd Petersen,  
22 also known as Todd Petersen, Adam Lowe, and Debra Sue Petersen, Esq. by means of a written or  
23 oral communication which included an untrue statement of material fact or omitted to state a material  
24 fact necessary to make the statement made, in light of the circumstances under which they were  
25 made, not misleading, in violation of Corporations Code section 25401.

26 Pursuant to Corporations Code section 25532, Gateway Financial Group, Petersen Lowe,  
27 LLC., also known as PetersenLowe, The Diamond Desk, also known as The Diamond Desk  
28 Corporation, The Diamond Market, LLC., Murray Todd Petersen, also known as Todd Petersen,

1 Adam Lowe, and Debra Sue Petersen, Esq. are hereby ordered to desist and refrain from offering or  
2 selling or buying or offering to buy any security in California, including but not limited to parcel  
3 program investment contracts, by means of any written or oral communication which includes an  
4 untrue statement of material fact or omits to state a material fact necessary in order to make the  
5 statements made, in light of circumstances under which they were made, not misleading.

6 This Order is necessary, in the public interest, for the protection of investors and consistent  
7 with the purposes, policies and provisions of the Corporate Securities Law of 1968.

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Dated: September 24, 2020  
Sacramento, California

MANUEL P. ALVAREZ  
Commissioner of Business Oversight

By \_\_\_\_\_  
MARY ANN SMITH  
Deputy Commissioner