

State of New Jersey Bureau of Securities  
153 Halsey Street  
P.O. Box 47029  
Newark, New Jersey 07101  
(973) 504-3600

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IN THE MATTER OF

NADINE LOWE  
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: **ADMINISTRATIVE CONSENT**  
: **ORDER**

This matter was opened by Marc B. Minor, Chief of the New Jersey Bureau of Securities ("Bureau Chief"), and the Bureau Chief, represented by Anne Milgram, Attorney General of New Jersey (Deputy Attorney General Elizabeth Lash, appearing), and Nadine Lowe ("Lowe"), represented by Corey Morano, Esq. (Law Offices of Russell P. Trocano and Associates). The Bureau Chief and Lowe have agreed to this interim resolution regarding the issues set forth below on the terms set forth in this Administrative Consent Order.

The Bureau Chief finds that:

- A. At all relevant times, Lowe was the Pastor of Alpha Omega Christian Fellowship ("Alpha Omega");
- B. Alpha Omega is a New Jersey corporation located in 700 Hope Road, Tinton Falls, New Jersey;
- C. Zina A. Martin ("Martin") and Lowe met at the Shore Christian Center church in or about 2003;
- D. Martin became an Alpha Omega congregant in or about 2003;
- E. Lowe began serving on the Board of Directors of Whirlwind Investments ("Whirlwind") at

- the request of Martin in or about 2003 or 2004;
- F. Lowe continued to serve on the Board of Directors after Whirlwind became known as Kairos Financial Corporation ("Kairos");
  - G. Kairos was incorporated in New Jersey in 2004;
  - H. Kairos maintained its principal place of business at 331 Newman Springs Road, Building 1, 4<sup>th</sup> Floor, Red Bank, New Jersey 07701;
  - I. Martin was registered with the Bureau as an investment advisor representative of Kairos from May 29, 2007 through October 11, 2007;
  - J. From December 2006 to May 2007, while neither Martin nor Kairos was registered with the Bureau, Kairos, through Martin, solicited funds from investors;
  - K. Kairos, through Martin, issued false and misleading monthly statements to investors until June 30, 2007;
  - L. Martin omitted material facts and information to investors, including, among others, that investors' monies were commingled with Kairos's operating funds; investment monies were used for Martin's personal expenses; investment monies were used to fund distributions to other investors; and none of the funds for which Martin solicited investor funds ever existed;
  - M. In or about 2006, Lowe received a 2004 Jeep Grand Cherokee, VIN No. 1J4GW 58N54 C1746 55 (the "Property"), from Martin and/or Kairos;
  - N. Lowe received the Property from Martin as "employee compensation";
  - O. Lowe and the Bureau Chief desire to resolve the disgorgement by Lowe of the Property through forfeiture of the Property without further expense and delay pending the outcome of the continuing investigation by the New Jersey Bureau of Securities (the "Bureau") into the

activities of Martin and/or Kairos;

- P. Lowe consents to the terms, conditions, and entry of this Administrative Consent Order.

**IT IS ORDERED AND AGREED:**

1. Lowe hereby relinquishes to the State of New Jersey, any right, title and/or interest which she has or had in the Property, which she consents to be restrained, on a date to be determined by the Bureau, from her possession and/or constructive possession;
2. Relinquishment of the Property to the State of New Jersey, as set forth in Paragraph 1, *supra*, is hereby confirmed, and it is also hereby confirmed that title to the Property shall be transferred to the State of New Jersey, and that ownership of the Property be vested in the State of New Jersey;
3. In no event shall the State of New Jersey or the person or persons who seize and restrain the Property pursuant to this Administrative Consent Order, or other personnel involved, be liable to suit or judgment in favor of Lowe, for or on account of any such action or actions arising out of the within matter;
4. Lowe acknowledges that this Administrative Consent Order is only in partial forfeiture by Lowe as to any claims the Bureau may have against her and/or her property, or that of the property of the Alpha Omega Christian Fellowship, both of whom are alleged to have received the proceeds of alleged criminal activity by Martin and/or Kairos. The Bureau and the Bureau Chief do not waive their right to pursue any and all additional legal remedies against Lowe to recover such proceeds or take additional action under the New Jersey Uniform Securities Law (1997), N.J.S.A. 49:3-47 et seq.;
5. The parties to this agreement acknowledge that for the purpose of enforcement of this

Administrative Consent Order, New Jersey law shall govern the terms and provisions herein;

6. The parties to this Administrative Consent Order represent that an authorized representative of each has signed this Administrative Consent Order with full knowledge, understanding and acceptance of its terms, and that each person has done so with authority to legally bind the respective party;
7. Nothing contained herein shall bind or affect the rights of any person not a party hereto, nor the rights of the parties against any person not a party hereto; and
8. Any addition, deletion, or change to this Administrative Consent Order must be in writing

(THIS AREA INTENTIONALLY LEFT BLANK.)

and signed by all the parties in order to be binding.

Consent to the Form  
and Entry of this Administrative Consent Order:

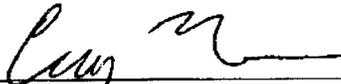
  
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Marc B. Minor  
Chief of the New Jersey Bureau of Securities

Dated: 1/20/10

ANNE MILGRAM  
ATTORNEY GENERAL OF NEW JERSEY  
Attorney for Marc B. Minor, Chief of the  
New Jersey Bureau of Securities

COREY MORANO, ESQ.  
Law Offices of Russell P. Trocano and  
Associates  
Attorney for Nadine Lowe

By:   
\_\_\_\_\_  
Elizabeth Lash  
Deputy Attorney General

By:   
\_\_\_\_\_  
Corey Morano, Esq.

Dated: 1/20/2010

Dated: 12/8/09