

THE MARYLAND DEPARTMENT OF  
LABOR, LICENSING AND  
REGULATION

v.

ANATOLY VOSKOVSKY,  
RESPONDENT

\* BEFORE A. ELIZABETH ROJUGBOKAN,  
\* AN ADMINISTRATIVE LAW JUDGE  
\* OF THE MARYLAND OFFICE  
\* OF ADMINISTRATIVE HEARINGS  
\* CASE NO.: DLR-PMG-64-10-08558  
\* PMG FILE NO.: SPMG-10-0036, 0037, 0038,  
\* 0049, 0054

\* \* \* \* \*

**RECOMMENDED DECISION**

**STATEMENT OF THE CASE  
ISSUES  
SUMMARY OF THE EVIDENCE  
FINDINGS OF FACT  
DISCUSSION  
CONCLUSIONS OF LAW  
RECOMMENDED ORDER**

**STATEMENT OF THE CASE**

On May 24, 2010, the Maryland Department of Labor, Licensing and Regulation (DLLR) ordered Anatoly Voskovsky t/a Antony Jewelers (Respondent) to appear for an administrative hearing to respond to charges that he allegedly violated various statutory provisions governing Secondhand Precious Metal Object Dealers and Pawnbrokers (PMG). The hearing date was initially scheduled for July 22, 2010, but was later postponed at the request of the Respondent due to his attorney's scheduling conflict.

I held a hearing on October 19, 2010, at the Office of Administrative Hearings (OAH) in Hunt Valley, Maryland pursuant to Md. Code Ann., Bus. Reg. § 12-210 (2010).<sup>1</sup> Peter Martin,

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<sup>1</sup> The sections noted throughout this decision from the Business Regulation Article are from the 2010 Replacement Volume unless otherwise noted.

Assistant Attorney General, represented DLLR. The Respondent appeared and was represented by Lee Steven Donner, Esq. of the Coastal Legal Group in Laurel, Maryland

Procedure in this case is governed by the provisions of the Administrative Procedure Act. Md. Code Ann., State Gov't. §§ 10-201 through 10-226 (2009 & Supp. 2010), Code of Maryland Regulations (COMAR) 09.01.02 and 09.01.03, and the OAH Rules of Procedure, COMAR 28.02.01.

### **ISSUES**

The issue is whether the challenged disciplinary action of DLLR is proper and what, if any, sanction is appropriate?

### **SUMMARY OF THE EVIDENCE**

#### **Exhibits**

The following exhibits were admitted into evidence as PMG Exhibits:

DLLR #1 Notice of Hearing, May 24, 2010, with attached Statement of Charges and Order for Hearing, July 22, 2010;

DLLR #2 Notice of Hearing, July 13, 2010;

DLLR #3 DLR ID Registration for Secondhand Precious Metal Object Dealers, October 12, 2010;

DLLR #4 Application for Review of Qualifications for a Dealers License, August 22, 2010

DLLR #5 Application for Renewal of License/Certificate, October 12, 2010;

DLLR #6 DLR Law Enforcement Complaint Referral Form, November 18, 2009.

The Respondent did not submit any exhibits.

## Testimony

The DLLR presented the testimony of the following witnesses:

- Dennis Gring, Executive Director, Precious Metals and Gems Division
- Corporal Christine Y. Sisk, Baltimore County Police Department, Burglary Unit
- Corporal Shawn Hanley, BCPD Criminal Investigation Unit

The Respondent testified on his own behalf and presented the testimony of his wife, Margarita Voskovsky.

## FINDINGS OF FACT

I find the following facts by a preponderance of the evidence:

1. At all times relevant to this proceeding, the Respondent has held a license as a secondhand precious metal objects dealer.
2. The Respondent operated a business known as Antony Jewelers.
3. Sometime in October 2009, Corporal Christine Sisk, BCPD, reminded the Respondent of the requirements of holding objects, of properly completing reporting forms, and maintaining appropriate transaction records.
4. Sometime before October 15, 2009, Corporal Sisk began receiving complaints that the Respondent and/or his employees were purchasing jewelry without requiring the proper seller identification.
5. On October 15, 2009, Corporal Hanley, Supervisor, BCPD's East Squad Burglary Unit, entered the Respondent's shop wearing jeans and a shirt to conduct an undercover sale of two rings and a bracelet. Corporal Sisk was observing the operation a few feet away from the Respondent's shop.

6. At the time of the transaction, there were two employees in the shop, the Respondent's wife and the Respondent's jeweler, Vladimir Siniavski. When Corporal Hanley was asked by the Respondent's wife if he had any identification, he responded "no" and she completed the sale without requiring any identifying information.

7. A few minutes later, Corporal Sisk entered the Respondent's shop to perform an administrative inspection. She identified the two rings and necklace associated with the undercover sale by the distinct markings the BCPD had placed on each item. The BCPD had marked the necklace, the rings and accompanying stones with the initials "CID," meaning Criminal Investigation Division. The Respondent's wife initially denied making the undercover purchase, then later recanted after further questioning.

8. During the administrative inspection, Corporal Sisk also observed two plastic bags of jewelry on the shop counter, one marked "10K" and the other marked "14K." The Respondent's wife provided a transaction form for only one of the rings in the plastic bag marked "10K."

9. The Respondent's wife also failed to provide any transaction forms associated with the jewelry in the plastic bag marked "14K." The plastic bag contained numerous pieces of jewelry, such as rings, bracelets, loose stones, necklaces, broaches and pendants. The Respondent's wife told Corporal Sisk that she had purchased most of the jewelry in the bag marked "14K" from two ladies on October 14, 2009, but had not completed a transaction form or maintained any record of the identification of any of the sellers.

10. On November 5, 2009, the Respondent and/or one of his employees failed to provide a complete description of the third, fourth, fifth, sixth and seventh objects listed on the

electronic reporting form and failed to include separate records entries for each object for Transaction No. 631122.

11. On November 9, 2009 the Respondent and/or his employee failed to provide the seller's date of birth for Transaction No. 635148.

12. On January 2, 2010 the Respondent and/or his employee failed to provide the seller's correct last name for Transaction No. 681307.

13. The Respondent's wife is not licensed as a Secondhand Precious Metal Object Dealer in the State of Maryland.

## DISCUSSION

### **Applicable Law**

The DLLR charged the Respondent with violating the provisions of Md. Code Ann., Bus. Reg. §§ 12-301(a), (d) and (e), 12-302(a), 12-304 (a) – (c), and 12-305 (a) and (c),<sup>2</sup> which require individuals engaging in Secondhand Precious Metal and Pawnbroker transactions to maintain a written record of each transaction and hold items without alteration for a specific duration. The applicable sections are as follows:

#### **§ 12-301. Required records.**

##### *(a) Records of dealers.-*

- (1) Each dealer shall make a written record, on a form provided by the Secretary, of each business transaction that involves the acquisition of a secondhand precious metal object when the transaction is made.
- (2) Each dealer shall retain the original copy of the written record required to be made under paragraph (1) of this subsection at the dealer's place of business.

...

*(d) Separate entries.-* A separate record entry shall be made for each item involved in a transaction. However, items in a matching set may be recorded as a set if acquired in a single transaction.

*(e) Tagging and numbering of items.-* The dealer shall tag each item individually with a number that corresponds to the transaction under which it was acquired. However, items acquired in a matching set may be tagged as a set.

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<sup>2</sup> Sections 12-301 (a), (d) and (e) and 12-304 (a) – (c) are in Supp. 2010 of the Business Regulation article.

**§ 12-302. Contents of records.**

- (a) *Records of dealers.*- In addition to any other information required by the Secretary, the records of a dealer shall include:
- (1) the date, place, and time of each transaction that involves the acquisition of a precious metal object;
  - (2) the name and address of the principal, if the transaction is by an agent;
  - (3) a description of the precious metal object, including:
    - (i) its approximate metallic composition;
    - (ii) any jewels, stones, or glass parts;
    - (iii) any mark, number, word, or other identification on the precious metal object;
    - (iv) its weight, if payment is based on weight;
    - (v) a statement whether it appears to have been altered by any means, including:
      1. obscuring a serial number or identifying feature;
      2. melting; or
      3. recutting a gem; and
    - (vi) the amount paid or other consideration;
  - (4) for each individual from whom the dealer acquires a precious metal object:
    - (i) the name, date of birth, and driver's license number of the individual;
    - or
    - (ii) identification information about the individual that:
      1. positively identifies the individual from at least 2 forms of identification, which may include an age of majority card, military identification, or passport; and
      2. provides a physical description of the individual, including the sex, race, any distinguishing features, and approximate age, height, and weight of the individual;
  - (5) a statement indicating whether or not the person making the transaction is personally known to the dealer; and
  - (6) **the signature of the person from whom the precious metal object or personal property is acquired and the dealer or employee who accepted the precious metal object. (Emphasis added)**

**§ 12-304. Copies to primary law enforcement units.**

- (a) *In general.*-
- (1) A dealer shall submit the required information from each record to the primary law enforcement unit in accordance with subsection (b) of this section.
  - (2) If the dealer transacts business in accordance with § 12-206(b) of this title, the dealer also shall submit the required information from the records to the local law enforcement unit in accordance with subsection (b) of this section.

- (3) On the request of a dealer, the Secretary shall provide to the dealer a list of local law enforcement units.
- (b) *Delivering copies in general; Howard County provision.*-
- (1) Subject to paragraph (2) of this subsection, the dealer shall submit the records by transmitting the required information from the records electronically, in a format acceptable to the receiving law enforcement unit, by noon of the next business day.
- (2) A dealer may request an extension of up to 48 hours to submit the records required under paragraph (1) of this subsection.
- (c) *Contents.*- Each record, submitted to the primary law enforcement unit and, if applicable, local law enforcement unit, shall include:
- (1) the license number of the dealer;
- (2) the location of each item listed in the record; and
- (3) the information required under § 12-302 of this subtitle.

### **§ 12-305. Holding period for precious metal objects**

- (a) *Duration - In general.*-
- (1) Except as otherwise provided in this section, a dealer who acquires a precious metal object shall keep it in the county where the dealer holds a license from the time of acquisition until at least 18 days after submitting a copy of a record of its acquisition under § 12-304 of this subtitle.
- (2) A dealer who acquires a precious metal object at an event which takes place at a location other than the dealer's fixed business address shall place the object and a record of its acquisition at a location in accordance with subsection (d)(1) or (2) of this section by the next business day after acquiring the object.
- (3) In partial compliance with the 18-day holding requirement under this subsection, a dealer may maintain an object and the record of its acquisition at a location other than the dealer's fixed business address, if the local law enforcement unit in the jurisdiction where the item was acquired provides written approval.
- ...
- (c) *Alteration of object.*-
- (1) Except as provided in paragraph (2) of this subsection, a dealer may not alter a precious metal object before or during the holding period.
- (2) During the holding period, a dealer may chemically test a precious metal object to determine its metal content or value if the dealer does not alter the precious metal object so as to affect its identification or value.
- (d) *Place for keeping object or record.*- During the holding period for a precious metal object, a dealer shall keep the precious metal object and the record of its acquisition in:
- (1) the place of business of the dealer; or
- (2) a storage facility specified in the license application of the dealer.

Violations of Md. Code Ann., Bus. Reg. §§ 12-301(a), (d) and (e), 12-302(a), 12-304 (a) – (c), and 12-305 (a) and (c), by a licensed secondhand precious metal objects dealer and pawnbroker, subject the licensee to sanction under Md. Code Ann., Bus. Reg. § 12-209 (2010), which provides:

**§ 12-209. Denials, reprimands, suspensions, and revocations - Grounds; restraining order.**

(a) *Grounds.*-

(1) Except as otherwise provided, in this subsection, a dealer's or applicant's agents, employees, management personnel, or partners include only those individuals who are directly involved in pawn transactions or the acquisition or sale of secondhand precious metals on behalf of the dealer or applicant.

(2) Subject to the hearing provisions of § 12-210 of this subtitle, the Secretary may deny a license to an applicant, reprimand a licensee, or suspend or revoke a license if the applicant or licensee or an agent, employee, manager, or partner of the applicant or licensee:

(i) fraudulently or deceptively obtains or attempts to obtain a license for the applicant or licensee or for another person;

(ii) fraudulently or deceptively uses a license;

(iii) has a similar license denied, suspended, or revoked in another jurisdiction;

(iv) under the laws of the United States or of any state, is convicted of a:

1. felony; or

2. misdemeanor that is directly related to the fitness and qualification of the applicant or licensee to be involved in a pawn transaction or the sale or acquisition of secondhand precious metals;

(v) knowingly employs or knowingly continues to employ, after being notified by the Secretary, an individual who, under the laws of the United States or of any state, is convicted of:

1. a felony; or

2. a misdemeanor that is directly related to the fitness and qualification of the employee to be involved in a pawn transaction or the sale or acquisition of secondhand precious metals;

(vi) knowingly employs or knowingly continues to employ in any capacity, after being notified by the Secretary, an individual whose precious metals dealer's license has been revoked;

(vii) willfully fails to provide or willfully misrepresents any information required to be provided under this title;

(viii) violates this title; or

(ix) violates a regulation adopted under this title.

(3) (i) Instead of or in addition to reprimanding a licensee or suspending or revoking a license under this subsection, the Secretary may impose a penalty not exceeding \$5,000 for each violation.



(ii) To determine the amount of the penalty imposed under this subsection, the Secretary shall consider:

1. the seriousness of the violation;
2. the harm caused by the violation;
3. the good faith of the licensee; and
4. any history of previous violations by the licensee

### **Merits of the Case**

This case arises from the Respondent's and/or one of his employee's acquisition of objects without obtaining all the necessary identifying information concerning the seller or the object acquired. The DLLR presented testimony and documentation regarding five separate incidents:<sup>3</sup>

- On October 14, 2009, the purchase of the contents of two plastic bags of jewelry (marked "10K" and "14K") without requiring identifying information from the sellers;
- On October 15, 2009, the undercover purchase of two rings and a necklace without requiring identifying information from the seller or completing a transaction form;
- On November 5, 2009, the purchase of jewelry without providing an adequate or complete description of the items;
- On November 9, 2009, the purchase of jewelry without obtaining the seller's date of birth;
- On January 2, 2010, the purchase of jewelry without documenting the seller's correct last name.

Based on these incidents, the DLLR alleges that the Respondent committed multiple violations relating to his failure to keep adequate records in conjunction with these transactions. Each violation is discussed below.

Dennis Gring, Executive Director for Secondhand Precious Metal Object Dealers and Pawn Brokers (Secondhand Dealers), testified concerning his administrative duties. Mr. Gring conducts daily oversight of the DLLR's program and ensures that all Licensees understand their responsibility for prompt and accurate reporting of all purchases (either wholesale or as an

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<sup>3</sup> The Respondent does not dispute that these transactions were not properly documented.

individual sale).<sup>4</sup> Mr. Gring discussed the change in the law on October 1, 2009, requiring each licensed secondhand dealer to generate an electronic transaction, including seller and object detail, the dealer's name and relevant licensing information. Mr. Gring then described the level of detail required for each object, such as the metallic composition of each object (i.e. gold, silver or platinum), its weight, a full description of the object purchased (i.e. necklace, ring) and the price paid for each item. Each electronic transaction form is due by 12:00 noon the day after any object is received.

Corporal Sisk, as a member of the Commercial Crime Team, oversees all ninety-two Baltimore County pawn shops as well as each secondhand dealer. She also performs quarterly inspections of each shop. Corporal Sisk detailed her two November 18, 2009 DLLR complaints, where she listed the following violations:

- Incomplete and inadequate item descriptions, violation of Md. Code Ann., Bus. Reg. §12-301 (a), (d) and (e) and 12-302 (a);
- Failure to hold items for at least eighteen days without alteration, in violation of Md. Code Ann., Bus. Reg. § 12-305;
- Inadequate description of the seller, in violation of Md. Code Ann., Bus. Reg. §12-302;
- Delinquent filing of transaction report, in violation of Md. Code Ann., Bus. Reg. §12-304.

DLLR Exhibit #6. She then summarized her attached October 19, 2009 and October 26, 2009 crime reports which described the circumstances that prompted her October 15, 2009 administrative inspection of the Respondent's shop. DLLR Exhibits #6 and 8.

Corporal Sisk initiated an undercover sale at the Respondent's shop due to numerous complaints that the Respondent and/or his employees were purchasing jewelry without requiring

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<sup>4</sup> Mr. Gring briefly discussed the Respondent's licensing history from when he first became licensed on August 20, 2001, through his recent renewal application, dated October 12, 2010.

seller identification.<sup>5</sup> On October 15, 2009, Corporal Hanley (an undercover corporal) entered the Respondent's shop to sell a necklace and two rings. The Respondent's wife purchased each item from the undercover corporal without requiring any identification. Moreover, the Respondent's wife failed to complete a transaction form, documenting the details of the items purchased, and requiring both the buyer and seller to sign. When Corporal Sisk walked into the Respondent's shop, approximately five minutes after the purchase, she was able to identify the objects associated with the undercover sale by the distinct markings the BCPD had placed on each item. Corporal Sisk explained that the Respondent's wife initially denied making the purchase, then later recanted after further questioning. In Corporal Sisk's opinion, this provided proof of the numerous complaints the BCPD received and demonstrated that the Respondent was in violation of Maryland Annotated Code, Business Regulation, section 12-302 for failing to properly document each jewelry purchase.

Corporal Sisk was also concerned about the speed in which the items purchased during the undercover operation were altered. In the few minutes that it took for her to enter the Respondent's shop, the Respondent's jeweler had already removed the stones in each ring from its setting. The Respondent was, therefore, in violation of Maryland Annotated Code, Business Regulation, section 12-305 (a) and (c), for failing to hold these items, without alteration, for at least eighteen days.

Upon further inspection of the Respondent's shop on October 15, 2009, Corporal Sisk found two plastic bags of jewelry sitting on the counter, one marked "10K" and the other marked

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<sup>5</sup> Corporal Hanley, Supervisor, BCPD's East Squad Burglary Unit, testified concerning his October 15, 2009 undercover purchase at the Respondent's shop. Corporal Hanley, wearing jeans and a shirt, entered the Respondent's shop to sell two rings and a bracelet. There were two employees in the shop, the Respondent's wife and Vladimir Siniavski. When asked by the Respondent's wife if he had any identification, he responded "no" and she completed the sale without requiring any identifying information. Corporal Hanley's testimony was consistent with the description provided by Corporal Sisk.

“14K,” containing numerous pieces of jewelry such as rings, bracelets, loose stones, necklaces, broaches and pendants. DLLR Exhibit #6. When asked, the Respondent’s wife explained that the plastic bag tagged “14K” consisted mostly of objects purchased from two ladies on October 14, 2009. The Respondent’s wife could not produce any records of the items purchased or the documentation of the sellers’ identification. When asked about the plastic bag tagged “10K”, the Respondent’s wife could only find an electronic transaction for one of the rings in the bag. Corporal Sisk noted that the consequence of failing to verify any identification limits the BCPD’s ability to recover stolen property for its residents. Corporal Sisk noted that the failure to fully describe each item was in violation of Maryland Annotated Code, Business Regulation, sections 12-301 and 12-302, which requires separate identification of each item, along with separate tagging and recording on an electronic transaction.<sup>6</sup>

Corporal Sisk later filed subsequent DLLR Complaints on December 21, 2009 and again on January 8, 2010, this time including detailed transactions on November 5, 2009, November 9, 2009 and January 2, 2009, highlighting the Respondent’s failure to provide a complete description of the seller. DLLR Exhibit #9 and 10.

On cross-examination, Corporal Sisk, acknowledged that some of the objects confiscated on October 15, 2009 were returned to the Respondent after he demonstrated that those items were not stolen and were his own original custom jewelry pieces.

The Respondent did not dispute the violations. Instead, he asked for leniency. The Respondent described the day-to-day operation of his shop, which is comprised of himself, his wife, his son and his jeweler. The Respondent expressed his passion for making one-of-a-kind

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<sup>6</sup> Corporal Sisk also found two bags of jewelry in the Respondent’s safe, some of which was later returned after the Respondent demonstrated that they were custom jewelry pieces he had made himself.

custom jewelry pieces (approximately sixty to eighty percent of his business is making custom jewelry).

The Respondent noted that he took immediate action after being alerted to the October 15, 2009 incident, when he responded to the shop within fifteen minutes of his wife's call. According to the Respondent, he had turned over the responsibility for purchasing gold for the shop to his wife so that he could devote his time to making custom jewelry and preparing to move to a new location. He now regrets that decision.

The Respondent has now resumed the responsibility for the day-to-day operation of the shop. He recently hired Margaret Tabb, Tabb Accounting and Tax Services, to audit his shop several times a week. The Respondent also no longer allows his wife to buy or sell any objects for the shop. On cross-examination, he acknowledged that he is responsible for the violations and apologized for his wife's actions. He also recalled his conversation with Mr. Gring, who reminded him that his wife cannot purchase any objects because she has a criminal conviction.

The Respondent's wife acknowledged that she violated the law on October 15, 2009. At the time, she was in charge of all the buying and selling for the shop. Since the Respondent's move to the new location, however, her husband is now more involved in the business. She acknowledged that her husband did advise her of the rules and regulations relating to electronic reporting, but she was "stupid" and "very, very foolish." The Respondent's wife now realizes that her actions have not only impacted the business, but her personal relationship with her husband.

Therefore, I conclude that the Respondent violated Maryland Annotated Code, Business Regulation sections 12-301(a), (d) and (e), 12-302(a), 12-304 (a) – (c), and 12-305 (a) and (c) for failing to verify identifying information about the seller or the objects being purchased during the

course of multiple transactions. Neither the Respondent nor his wife deny the violations associated with their record-keeping.

Based on the evidence presented, I find that the Respondent is subject to sanctions. The Respondent did not dispute any of the facts. Moreover, these multiple violations are serious in nature and demonstrate a lack of good faith and improper oversight of business transactions between October 14, 2009 and January 2, 2010, when the last violation was noted. DLLR Exhibit #10.

### **Sanctions**

DLLR recommended a 90-day suspension and a \$5,000.00 fine for the charged violations. The Respondent does not have any prior violations.

DLLR explained that the information required by law was for the purpose of protecting the citizens of Maryland. During the October 15, 2009 undercover purchase, the Respondent's wife authorized the Respondent's jeweler to remove the stones from the setting of the two rings within minutes of the transaction. The very nature of this behavior demonstrates bad faith and an intent to alter the objects almost immediately after purchase, rendering each object unrecognizable and difficult to recover, if they had been lost or stolen. DLLR further argued that other plastic bags of jewelry found in the Respondent's shop could not be found on any transaction report. I further conclude that the Respondent willfully and deliberately chose to transfer the responsibility for purchasing and selling jewelry for the shop to his wife, without his oversight and supervision.

While I acknowledge the Respondent's recent efforts in hiring Tabb Accounting and Tax Services to conduct weekly audits and taking on the sole responsibility for the purchase and sale

of jewelry and recordkeeping at the store, I must apply the law as it is written. I am persuaded that the seriousness of these transactions warrant sanctions.

Accordingly, I agree that a sanction is appropriate, but I am not persuaded that the Respondent's behavior warrants a 90-day suspension and a \$5,000.00 fine as recommended by DLLR. I acknowledge that a few of the items seized on October 15, 2009 by the BCPD were later returned to the Respondent once he was able to demonstrate that they were his custom pieces. I also note that the Respondent has put a new structure in place to address his poor recordkeeping. Therefore, I recommend a 10 day suspension and a fine of \$2,500.00.

#### **CONCLUSIONS OF LAW**

Based upon the foregoing Findings of Fact and Discussion, I conclude as a matter of law, the Respondent and/or his employees completed transactions between October 15, 2009 and January 2, 2010, in violation of Md. Code Ann., Bus. Reg. §§ 12-301(a), (d) and (e), 12-302(a), 12-304 (a) – (c), and 12-305 (a) and (c). I further conclude, as a matter of law, that the Respondent is subject to sanction under Md. Code Ann., Bus. Reg. § 12-209(a)(2)(viii), (ix)(2010).

#### **RECOMMENDED ORDER**

Based upon the foregoing Findings of Fact, Discussion, and Conclusions of Law, it is RECOMMENDED that the Board of Secondhand Precious Metal Object Dealers and Pawnbrokers, Department of Labor, Licensing and Regulation:

ORDER that the Respondent, Anatoly Voskovsky, t/a Antony Jewelers, is in violation of Md. Code Ann., Bus. Reg. §§ 12-301(a), (d) and (e), 12-302(a), 12-304 (a) – (c), and 12-305 (a) and (c); and be it further,

ORDERED that the license of the Respondent, Anatoly Voskovsky, be suspended for **10 days** pursuant to Md. Code Ann., Bus. Reg. §12-209; and be it further,

ORDERED that the Respondent, Anatoly Voskovsky, pay a fine of **\$2,500.00**; and be it further,

ORDERED that the records and publications of the Maryland Department of Labor Licensing and Regulation, Board of Secondhand Precious Metal Object Dealers and Pawnbrokers reflect this decision.

ADMINISTRATIVE LAW JUDGE'S SIGNATURE  
APPEARS ON ORIGINAL ORDER

January 13, 2011  
Date

A. Elizabeth Rojumbokan  
Administrative Law Judge

AER/  
#118068



THE MARYLAND DEPARTMENT OF  
LABOR, LICENSING AND  
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**EXHIBIT LIST**

**Exhibits**

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