MARYLAND DEPARTMENT OF LABOR,		*	BEFORE THE MARYLAND				
LICENSING AND REGULATION		*	DEPARTMENT OF LABOR,				
v.		*	LICENSING AND REGULATION				
SHERZOD HAYITOV,		*	Case Nos.:		[G-15-0		
Respondent		*		SPM	IG-15-0 IG-16-0	0001	Ø
		*		SPM	IG-16-0	0014	
* * * * * *	*	*	* *	*	*	*	

CONSENT ORDER

This matter comes before the Maryland Department of Labor, Licensing and Regulation ("Department") as a result of separate complaints filed by the Charles County Sheriff's Office and the Baltimore County Police Department. Upon a review of the complaints and subsequent investigations, the Department determined that administrative charges against Sherzod Hayitov (the "Respondent") were appropriate and that administrative hearings should be held.

On or about August 25, 2015, the Department issued Statements of Charges and Orders for Hearing in Case Nos. SPMG-15-0023, SPMG-15-0032, and SPMG-16-0001. A combined hearing was held in those cases on or about December 10, 2015 and the Administrative Law Judge ("ALJ") subsequently issued a decision recommending that the Respondent's licenses to act as a secondhand precious metal object and pawnbroker dealer be suspended for a period of 120 days and that a civil penalty should be imposed in the amount of \$7500.00. On or about April 27, 2016, the Department issued a Proposed Order affirming the ALJ's recommended decision.

The Respondent filed exceptions to the Proposed Order and a hearing on those exceptions was scheduled for October 17, 2016 before Kelly M. Schulz, Secretary of the Department. Prior to the exceptions hearing, however, the Respondent and the Department reached an agreement to enter into this Consent Order in order to resolve those cases.

Further, on or about July 5, 2016, the Department issued a Statement of Charges and Order for Hearing in Case No. SPMG-16-0014 and the matter was to be scheduled for a hearing through the Office of Administrative Hearings. The parties agreed to resolve that case, as well, by means of this Consent Order without an administrative hearing.

The Department and the Respondent consent to the entry of this Order as a full and final resolution of the administrative actions relating to the Department's charges issued in Case Nos. SPMG-15-0023, SPMG-15-0032, SPMG-16-0001, and SPMG-16-0014.

THE PARTIES AGREE AND STIPULATE:

- 1. At all times relevant to the matters set forth in this Consent Order, the Department had jurisdiction over the subject matter and the Respondent.
- 2. The Respondent holds the following secondhand precious metal object dealers and pawnbrokers licenses with the Department relating to four separate business locations:
 - a) 01-2622 (Waldorf, Maryland 20603);
 - b) 01-2622-01 (Baltimore, Maryland 21236);
 - c) 01-2622-02 (Baltimore, Maryland 21236); and
 - d) 01-2622-03 (Westminster, Maryland 21157).
- 3. At the times of his application for and renewal of his dealer's licenses, the Department made the Respondent aware of the requirements of the laws pertaining to secondhand precious metal object dealers and made those laws, and explanations of them, available to him.
- 4. During an interview with the Respondent at the time of his application for his dealer's license, a Department representative reviewed the Maryland Secondhand Precious Metal Object ("SPMO") Dealers and Pawnbrokers Act, Md. Ann. Code, Business Regulation Art., Sections 12-101 et seq. (the "Act") with him, along with the "Guidelines for Completing and Filing Daily Transaction Reports" ("Guidelines"), and all of the relevant advisories on the Department website. At the time, the Respondent affirmed in writing under penalty of perjury that he had read the Act and the regulations relating to licensing and that he understood his responsibilities under the law.
- 5. During 2013 and 2014, local law enforcement also provided the Respondent with a copy of the Act and, reviewed with him the requirements for completing the paper and electronic reports and the necessity of providing detailed descriptions of jewelry and flatware, and explained that the Respondent may communicate with law enforcement with regard to issues relating to SPMOs.
- 6. With respect to Case Nos. SPMG-15-0023, SPMG-15-0032, and SPMG-16-0001, the Proposed Findings of Fact and Conclusions of Law contained in the Proposed Order, dated April 27, 2016, are agreed to by the Respondent and are incorporated by reference herein.

Case No. SPMG-15-0023:

- 7. Sometime prior to February 4, 2015, the Respondent or an employee of the Respondent at 11110 Mall Circle Drive in Waldorf, Maryland (a kiosk in the Charles County Town Center), acquired the following SPMOs commercially from the public:
 - a yellow gold ring with a blue marquise stone
 - a yellow gold ring with pink stones all around

- a loose purple stone
- a yellow gold circle pendant with 14 chips
- a loose clear round stone
- a pair of yellow gold earrings, with stones removed
- 8. The Respondent kept rings in a pencil case on the kiosk desk and the purple stone in the corner of the kiosk desk. The Respondent kept the clear round stone and the earrings in a white jewelry box in the kiosk drawer.
 - 9. The Respondent did not tag any of the aforementioned items.
- 10. The Respondent did not make a written record, on a form provided by the Secretary of the Department, of the aforementioned business transactions when they were made.
- 11. The Respondent did not report to law enforcement, either electronically or by paper form, the transactions involving the aforementioned objects.
- 12. During the period June 1-8 2015, the Respondent prepared paper Daily Transaction Reports relating to certain transactions in which the Respondent acquired SPMOs commercially from the public. The Respondent electronically reported those transactions to law enforcement, but did not describe in the electronic reports the specific objects that were included in the following descriptions:
 - June 1, 2015 Transaction No. 2018; item no. 30298480: "Ladies Sterling Silver Scrap Silver - Broken Old Jewelry - Weight: 169.6 DWT"
 - June 3, 2015 Transaction No. 2024; item no. 30325220: "Ladies Sterling Silver Scrap Silver Old, Broken Weight: 16.4"
 - June 4, 2015 Transaction No. 2030; item no. 30343132: "Inisex Sterling Silver Scrap Silver Broken Old Weight 24.2"
 - June 4, 2015 Transaction No. 2034; item no. 30343163: "825.4 Silverware Forks, Spoons, Knives"
 - June 5, 2015 Transaction No. 2038; item no. 30359470: "Ladies Sterling Silver Scrap Silver Old Broken Weight 13.2"
 - June 7, 2015 Transaction No. 2047; item no. 30397295: "Ladies 10K Yellow Gold Chain Box Link, Weight: 2 DWT and some pendants too" and item no. 30397296: "Ladies Sterling Silver Scrap Silver Broken Old Gold Jewelry Weight: 13.6 DWT"

- June 8, 2015 Transaction No. 2048; item no. 30402360: "Ladies Sterling Silver Scrap Silver - Old Broken - Weight 19.6"
- 13. The Respondent did not electronically report Transaction No. 2047 to law enforcement by noon of the next business day.

Case No. SPMG-15-0032:

14. On or about May 15, 2015, Detective Kevin Thomas of the Baltimore County Police Department conducted an inspection at the Respondent's business location at 8200 Perry Hall Boulevard, Baltimore, Maryland 21236. The inspection revealed that the Respondent incorrectly or inadequately described the following transactions involving the acquisition of SPMOs commercially from the public in electronic Daily Transaction Reports filed with law enforcement:

April 23, 2015 Transaction No. 851 (electronically reported on April 24, 2015):

- Item no. 29677252: failed to note that the described "bracelet link" had round links
- Item no. 29677253: failed to note that the described "Ladies' 14K Yellow Gold Ring Band" had a dome top with splits on both sides
- Item no. 29677254: failed to note that the described "Ladies' 14K Yellow Gold Ring" had an "S" shape design
- Item no. 29677255: failed to note that the described "Ladies' 14K Yellow Gold Ring Band" had a leaf cut design with a cluster of clear round stones

April 25, 2015 Transaction No. 859 (electronically reported on April 26, 2015):

- Item no. 29704569: failed to note the correct number of charms in the described "Ladies' 10K Yellow Gold Bracelet with many charms, plane charm, card, book, calendar, car, round shapes" and failed to describe a bracelet as having the following charms: telephone, house, 25th anniversary circle, 50th anniversary circle, Floridashape, shoes, ring set, slot machine and #1 box charms
- Item no. 29704572: failed to note that the described "Ladies' 14K Yellow Gold Ring Band" had beaded edges all around it
- Item no. 29704573: failed to note that the described "Ladies' 14K Yellow Gold Bracelet Link" had oval-shaped links
- Item no. 29704576: failed to note that the described "Ladies' 14K Yellow Gold Earrings Hoop" had a knotted link design

- Item no. 29704577: failed to note that the described "Ladies' 14K Yellow Gold Earrings Hoop" had a "cut looking" design
- Item no. 29704580: failed to note that the described "Ladies' 14K Yellow Gold Earrings Hoop" had a "cut looking" design
- Item no. 29704582: failed to note that the described "Ladies' Sterling Silver Bangle Band" was a six inch bracelet with green/red stones all around it
- Item no. 29704583: filed to note that the described "Ladies' Sterling Silver Earrings" were one inch long with a half circle shape
- Item no. 29704584: failed to note that the described "Ladies' Sterling Silver Necklace Curb with cross charm" had all shapes on each link

April 27, 2015 Transaction No. 864 (electronically reported on April 28, 2015):

• Item no. 29739651: failed to note that the described "Ladies' 14K Yellow Gold Earrings" had a round woven knot design

April 29, 2015 Transaction No. 872 (electronically reported on April 30, 2015):

• Item no. 29777333: failed to classify the item as "Collectibles"; listed the sub-class as "Adaptors" instead of "Silverware"; failed to note that the described "Sterling spoons" consisted of seven sterling silver spoons, and failed to include separate entries for the spoons

May 1, 2015 Transaction No. 877 (electronically reported on May 2, 2015):

- Item no. 29808978: failed to include in the description of "Ladies 10K White Gold Ring Class/School" the year "2009", its lion head, the school name (Dulaney), and its sporting equipment
- Item no. 29808979: failed to include in the description of "Ladies' 10K White Gold Ring Class/School" the school name (Madison College), the year "1977", and the letters "BFA"
- Item no. 29808980: failed to include in the description "Ladies 10K White Gold Ring Class/School" the school name (Andover High School) and the year "1961"

May 1, 2015 Transaction No. 878 (electronically reported on May 2, 2015):

 Item no. 29809050: failed to note in the description of "Ladies' 10K Yellow Gold Ring Band V shape with clear round stones" that the ring had 10 clear round stones

May 2, 2015 Transaction No. 881 (electronically reported on May 3, 2015):

• Item no. 29818210: failed to note in the description of "men's 10K Yellow Gold Necklace Byzantine shape with big cross charm with clear round stones" that the length of the necklace was 25 inches

May 2, 2015 Transaction No. 882 (electronically reported on May 3, 2015):

- Item no. 29818211: failed to note in the description of "Ladies' 14K Yellow Gold Bracelet double curb with 3 different small charms" that the charms were a champagne bottle, a heart, and a medallion with the number "1,200"
- Item no. 29818212: failed to note in the description of "Ladies' 14K Yellow Gold Bracelet Link" that the links were square and x-shaped
- Item no. 29818213: failed to note in the description "Men's 14K Yellow Gold Ring Band" that the ring band had beaded edges all around it and that the ring was cut open
- Item no. 29818215: described "Ladies' 14K Yellow Gold Ring Band" instead of a three-piece fitted ring set with a total of 11 clear round stones

May 3, 2015 Transaction No. 885 (electronically reported on May 4, 2015):

• Item no. 29830950: failed to note in the description "Ladies' 14K Yellow Gold Ring Band" that the ring was v-shaped with pointed ends and that it had one clear round stone

Case No. SPMG-16-0001:

15. On or about June 9, 2015, members of the Charles County Sheriff's Office visited the Respondent's business location at 11110 Mall Circle Drive, Waldorf, Maryland 20603. It was determined that, on or about June 8, 2015, the Respondent completed the paper copy of a Daily Transaction Report relating to Transaction No. 2048. That Daily Transaction Report included the following descriptions of the SPMOs:

Quantity	<u>Description</u>	Monograms/Inscriptions	Jewels/Stone Glass Comp
4	Silver, sterling	Scrap Silver	

1	Ring, sterling	Solitaire, L	green oval
1	Ring, sterling	Band, L	c/r square
1	Ring, sterling	Band, L	blue oval
1	Ring, sterling	Band, L	red/clr rds

16. The Respondent did not describe the "scrap" objects in the paper copy of the Daily Transaction Report. In addition, he did not report that (1) a ring had a silver leaf design with a blue stone, ornate; (2) a ring had a silver scroll design, with a blue center stone and four purple stones surrounding it; (3) a ring was silver, with a red square center stone, surrounded by small red stones in a diamond shape; and (4) a ring was a silver dinner-type ring, with a light blue or clear round stone.

- 17. The Respondent did not note on the paper Daily Transaction Report whether the seller had glasses or tattoos or scars.
- 18. The Respondent did not electronically report the aforementioned transactions involving the acquisition of rings to law enforcement.

Case No. SPMG-16-0014:

- 19. The Statement of Charges and Order for Hearing ("Charge Letter") in Case No. SPMG-16-0014 is incorporated by reference herein. The Respondent agrees to the facts as alleged in said Charge Letter.
- 20. On or about February 25 and February 29, 2016, Detective Jennifer McKenzie of the Charles County Sheriff's Office conducted inspections at the Respondent's business at 11110 Mall Circle Drive, Waldorf, Maryland. The inspections revealed that the Respondent failed, in electronic reporting, to adequately describe objects and/or failed to electronically report transactions in a timely manner, as follows:

Electronic Report for Transaction No. 3212:

- Item no. 34203652: failed to note that six of the total eight knives were dinner knives; failed to note that four of those six knives had the manufacturer's name on them; failed to note that the remaining two knives (of those six) were cake servers, with one having the manufacturer's name on it; and failed to describe the pattern(s) on the knives.
- Item no. 34203653: failed to note that one spoon (of a total of twelve spoons) had "Yellowstone Park" inscribed on the handle, with images of an erupting geyser ("Old

Faithful") and the "Old Faithful Inn"; failed to note that another spoon had "Chief' and "Seattle" inscribed on the handle, with images of an American Indian and "Totempole Pioneer Square Seattle Wash."; failed to note that another spoon had "Heirloom Sterling" inscribed with a rose design on the handle; failed to note that the remaining nine spoons had the manufacturer's name inscribed on them; and failed to list the twelve spoons separately.

- Item no. 34203654: failed to describe the pattern(s) of the six forks and failed to note that the manufacturer's name was inscribed on the forks.
- Item no. 34203655: failed to describe the pattern(s) on the knives and failed to note that the manufacturer's name was inscribed on them.
- Item no. 34203661: failed to describe the pattern on the bowl and failed to note that it had a handle.
- Item no. 34203662: failed to include the length of the bracelet.
- Item no. 34203634: incorrectly described the color as yellow gold instead of rose gold.
- Item no. 34203646: failed to provide an accurate description of the earrings.
- Item no. 34203647: failed to note the karat of the gold.
- Item no. 34203649: failed to note the wide line design on the hoops.
- Item no. 34203635: failed to note the length of the chain.
- Item no. 34203644: failed to list the two objects separately and failed to note the length of the necklaces.
- Item no. 34203650: failed to note the length of the chain.
- Item no. 34203656: failed to include a description of the floral pattern on two of the spoon broaches and failed to note the letter "W" on the third broach.
- Item no. 34203629: failed to note that the ring had a design of a statue of Jesus on it.
- Item no. 34203630: failed to provide an accurate description of the object.
- Item no. 34203631: failed to note a design of grape clusters on the ring.

- Item no. 34203632: failed to note a design of grape clusters on the ring.
- Item no. 34203638: failed to describe the ring as dome-shaped with a hammered or brushed finish.
- Item no. 34203659: failed to note that the ring was a spoon handle converted to a ring.
- Item no. 34203660: failed to note that the ring included a design of the White House.

Electronic Report for Transaction No. 3218:

• Item no. 34223973: failed to note that the Ladies' 10K Yellow Gold Ring Band was damaged, or altered.

Electronic Report for Transaction No. 3162:

• Item no. 34001239: failed to note the length of the chain.

Electronic Report for Transaction No. 3164:

- Item nos. 34002159, 34002160, and 34002163: failed to note the length of the bracelets.
- Item nos. 34002150, 34002156, 34002157, 34002161, 34002162, and 34002164: failed to note the length of the chains.
- Item no. 34002165: failed to note the length of the necklace.

Electronic Report for Transaction No. 3165:

- Item no. 34003262: failed to note the length of the bracelet.
- Item no. 34003263: failed to note the length of the necklace.

Electronic Report for Transaction No. 3166:

• Item nos. 34004445, 34004446, and 34004447: failed to note the length of the bracelets.

Electronic Report for Transaction No. 3181:

• Item no. 34079372: failed to note the length of the chain.

Electronic Report for Transaction No. 3182:

Item no. 34079506: failed to note the length of the bracelet.

Electronic Report for Transaction No. 3185:

- Item nos. 3408131, 3408134, and 3408135: failed to note the length of the bracelets.
- Item no. 34080130: failed to note the length of the chain.

Electronic Report for Transaction No. 3201:

• Item no. 34153206: failed to note the length of the chain.

Electronic Report for Transaction No. 3202:

- Item no. 34153791: failed to note the length of the bracelet.
- 21. The following electronic reports were not filed in a timely manner:

Nos. 3162, 3164, 3165, 3166, 3181, 3182, 3183, 3184, 3185, 3201, and 3202.

22. The Respondent agrees and admits to the following violations of law and agrees that this Consent Order shall be entered as a Final Decision and Order of the Department finding him in violation in each case, respectively:

Case No. SPMG-15-0023:

- (a) The Respondent violated sections 12-301(a)(1)-(2), (d)(1), (f)(1)-(2), 12-302(a), 12-303, and 12-304(a)(1), (b)(1), (c) of the Act on or about February 4, 2015 by:
- (i) failing to maintain proper records of transactions involving the acquisition of certain SPMOs;
- (ii) failing to report those transactions to law enforcement, either electronically or by paper form; and
 - (iii) failing to tag the SPMOs.
- (b) The Respondent violated sections 12-304(a)(1), (b)(1), and (c)(3) of the Act between June 1, 2015 and June 8, 2015 by failing to provide adequate descriptions of certain SPMOs when he electronically reported the transactions involving their acquisition to law enforcement.

(c) The Respondent violated section 12-304(b)(1) of the Act on June 7, 2015 by submitting an electronic report of a transaction to law enforcement after noon of the next business day.

Case No. SPMG-15-0032:

(d) The Respondent violated sections 12-304(a)(1), (b)(1), and (c)(3) of the Act on or about April 24, 26, 28, and 30, 2015 and May 2, 3, and 4, 2015, by failing to electronically report transactions to law enforcement properly and/or with adequate descriptions of the SPMOs.

Case No. SPMG-16-0001:

- (e) The Respondent violated sections 12-302(a)(3), (a)(4)(ii)2, 12-304(a)(1), (b)(1), and (c)(3) of the Act on or about June 8, 2015 by:
 - (i) failing to provide adequate descriptions of certain SPMOs acquired in transaction No. 2048 on or about that date in the paper Daily Transaction Report;
 - (ii) failing to note on the paper report whether the seller in Transaction No. 2048 had glasses or tattoos or scars; and
 - (iii) failing to electronically report all of the SPMOs acquired in transaction No. 2048 to law enforcement.

Case No. SPMG-16-0014

- (f) The Respondent violated sections 12-301(a)(1) and (d)(1), 12-302(a), and 12-304(a)-(c) of the Act on or before February 25 and February 29, 2016 by:
 - (i) failing to provide adequate descriptions of certain SPMOs acquired in transactions; and
 - (ii) failing to electronically report transactions in a timely manner.
- 23. The Respondent agrees to the following sanctions as a result of his violations:
- (a) The Respondent shall pay a civil penalty in the amount of \$25,000.00 to the Department in accordance with the following schedule:
 - i) an initial payment in the amount of \$3000.00 shall be due immediately on the date of this Consent Order; and
 - ii) there shall be eleven subsequent successive monthly payments in the amount of \$2000.00 each. The first of said payments shall be due on December 1, 2016 and the

remaining payments shall be due on the first day of each month thereafter, respectively, until the total penalty amount is paid in full.

In the event that the Respondent fails to make any required payment in accordance with the terms of this Consent Order, the Respondent's licenses to act as a secondhand precious metal object dealer and pawnbroker shall be immediately and automatically suspended until such time as the required payment is made;

- b) The Respondent's licenses to act as a secondhand precious metal object dealer and pawnbroker shall be placed on a Probationary Status for a period of five years from the date of this Consent Order. If the Department issues a final order in any other matter during the five year probationary period finding that the Respondent has engaged in a violation of the Act or applicable regulations, the Respondent's licenses to act as a secondhand precious metal object dealer and pawnbroker shall be immediately and automatically revoked by operation of and through this Consent Order as a result of the violations in this matter;
- c) The Respondent and all current employees shall undergo the following training within three months of the date of this Consent Order:
 - i) Training by the Department pertaining to the Act, applicable regulations, and the Guidelines; and
 - ii) Training by local law enforcement authorities pertaining to the electronic filing of transaction reports through the RAPID filing system.

The Respondent shall provide written documentation of the satisfactory completion of the above referenced training to the Department within three months of the date of this Consent Order.

- 24. The Respondent, by entering into this Consent Order, expressly waives the right to any further proceedings before the Department to which he may otherwise be entitled in this matter and waives any rights to appeal from this Order.
- 25. The Respondent agrees that he shall abide by the provisions of the Act and applicable regulations (Code of Maryland Regulations 09.25.01 et. seq.) with regard to all future transactions.
- 26. The Respondent enters into this Consent Order freely, knowingly and voluntarily, and with the advice of counsel.
- 27. The Respondent acknowledges and agrees that this Consent Order shall constitute a Final Decision and Order of the Department and shall be enforceable as such.

BASED ON THESE STIPULATIONS, IT IS, THIS PDAY OF TWENDED, 2016, BY THE MARYLAND DEPARTMENT OF LABOR, LICENSING AND REGULATION:

ORDERED that the Respondent has violated the following sections of the Maryland Secondhand Precious Metal Object Dealers and Pawnbrokers Act:

- 1) <u>SPMG-15-0023</u>: 12-301(a)(1)-(2), (d)(1), (f(1)-(2), 12-302(a), 12-303, and 12-304(a)(1), (b)(1), (c);
- 2) <u>SPMG-15-0032:</u> 12-304(a)(1), (b)(1), (c)(3);
- 3) <u>SPMG-16-0001:</u> 12-302(a)(3), (a)(4)(ii)2, and 12-304(a)(1), (b)(1), (c)(3); and
- 4) SPMG-16-0014: 12-301(a)(1) and (d)(1), 12-302(a), and 12-304(a)-(c);

AND IT IS FURTHER ORDERED that the Respondent shall pay a civil penalty in the amount of \$25,000.00 to the Department in accordance with the schedule outlined in paragraph 23 of this Order;

AND IT IS FURTHER ORDERED that, if the Respondent fails to make any required payment in accordance with the terms of this Consent Order, the Respondent's licenses to act as a secondhand precious metal object dealer and pawnbroker shall be immediately and automatically suspended until such time as the required payment is made;

AND IT IS FURTHER ORDERED that the Respondent's licenses to act as a secondhand precious metal object dealer and pawnbroker shall be placed on a Probationary Status for a period of five years from the date of this Consent Order;

AND IT IS FURTHER ORDERED that if the Department issues a final order in any other matter during the five year probationary period finding that the Respondent has engaged in a violation of the Act or applicable regulations, the Respondent's licenses to act as a secondhand precious metal object dealer and pawnbroker shall be immediately and automatically revoked by operation of and through this Consent Order as a result of the violations in this matter;

AND IT IS FURTHER ORDERED that the Respondent and all current employees shall undergo, and the Respondent shall provide written documentation of the satisfactory completion of, the following training within three months of the date of this Consent Order:

- 1) Training by the Department pertaining to the Act, applicable regulations, and the Guidelines; and
- 2) Training by local law enforcement authorities pertaining to the electronic filing of transaction reports through the RAPID filing system;

AND IT IS FURTHER ORDERED that, if the Respondent fails to comply with any of the requirements for training and/or proof of completion in accordance with paragraph 23 of this

Consent Order, the Respondent's licenses to act as a secondhand precious metal object dealer and pawnbroker shall be immediately and automatically suspended until such time as compliance occurs;

AND IT IS FURTHER ORDERED that this matter shall be resolved in accordance with the terms of this Consent Order, and that the same shall be reflected among the records of the Department;

AND IT IS FURTHER ORDERED that this Consent Order shall constitute a Final Decision and Order of the Secretary of the Maryland Department of Labor, Licensing and Regulation.

Signature on File

SHERZOD HAYITOV, RESPONDENT

Signature on File

KELLY M.'SCHULZ, SECRETARY
DEPARTMENT OF LABOR, LICENSING AND REGULATION

| 1 - 10 - 16 |
| DATE | DATE