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Via e-mail

Attn: section 352 Jewelry Dealer Regulations

Your regulation should clarify whether certain incidental "dealers" are subject to this regulation when the \$50,000 threshold is met:

1. Pawn shops that incidentally accept jewelry and sell the jewelry when the pawn contract is not paid.
2. Estate auctioneers and attorneys that sell jewelry of an estate along with other household items.
3. Bankruptcy trustees that sell jewelry as part of liquidating a bankrupt's estate.
4. Individuals who hold "tupperware" type parties in their home to allow a dealer to sell jewelry to guests.
5. School districts and schools (public and private) across the country that sponsor the sale of high school class rings.

There are probably a lot more examples of this type of an incidental "dealer."

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