Present Art. 58A, § 7, however, entitles an applicant to judicial review of a denial. Therefore, it is not clear whether the Administrative Procedure Act appeal procedures apply to the proceedings described in this section in whole, in part, or not at all. Specifically, the second sentence of present Art. 58A, § 7(a) — now subsection (b) of this section — requires that an appeal be "on the record of proceedings before the commissioner" except in certain limited circumstances. Since no hearing is required before an application for a license may be denied, it is uncertain what would constitute the "record of proceedings" in that case on which a court could base its review. The General Assembly may wish to consider clarifying legislation in this area.

11-219. SALE OF LOAN ACCOUNT TO UNLICENSED PERSON.

(A) SALE PROHIBITED.

A LICENSEE MAY NOT SELL A LOAN ACCOUNT TO ANY PERSON WHO IS NOT LICENSED UNDER THIS SUBTITLE.

(B) ACCOUNT UNENFORCEABLE IF ACQUIRED BY UNLICENSED PERSON.

A LOAN ACCOUNT THAT IS ACQUIRED BY A PERSON WHO IS NOT LICENSED UNDER THIS SUBTITLE IS NOT ENFORCEABLE.

REVISOR'S NOTE: This section presently appears as Art. 58A, § 15.

The only changes are in style.

11-220. REPORTING OF CRIMINAL VIOLATIONS.

THE COMMISSIONER SHALL REPORT TO THE APPROPRIATE STATE'S ATTORNEY ANY ALLEGED CRIMINAL VIOLATION OF THE MARYLAND CONSUMER LOAN LAW.

REVISOR'S NOTE: This section presently appears as the third sentence of Art. 41, § 192A(a).

The reference to any "alleged" criminal violation is new language added to reflect the fact that the Commissioner does not determine whether a criminal violation actually has been committed.

The present clause "and the State's attorney shall take such action relating to said alleged violations as he may deem appropriate" is deleted as unnecessary and misleading given the prerogatives of a State's attorney.

The only other changes are in style.