

Subject: **Local Law 149 Electronic Recordkeeping**  
Date: 6/15/2017 2:07:02 PM Eastern Standard Time  
From: ROBERT.BARROWS@nypd.org  
To: towingassn@aol.com  
Cc: CARRIE.TALANSKY@nypd.org

Mr. Siegel,

I am in receipt of your e-mail to Commissioner Byrne today. Below, please see our below interpretation with respect to Local Law 149 and the industries you represent. You are correct that your reading of Local Law 149 pertains to jewelers, pawnbrokers and other second-hand dealers that deal in such items.

Local Law 149 requires reporting to LeadsOnline for second-hand dealers and pawnbrokers.

A number of auto-related businesses, however, are licensed as second-hand dealers in New York City such as junk dealers, scrap processors (although there are separate scrap processing licenses pursuant to the GBL), used car dealers, and businesses that purchase used car parts. Local Law 149 focuses on the reporting of second-hand articles composed wholly or partly of precious metals and electronics into LeadsOnline. Although admittedly some car parts do contain elements of precious metals, the legislative intent suggests that these items were not supposed to be subject to Local Law 149. The same interpretation applies to used car dealers.

As such, scrap processors, salvage yards, businesses that buy and sell used cars and used car parts are not subject to reporting into LeadsOnline pursuant to Local Law 149. UMOS, however, are reminded that as a condition of possessing a second-hand dealer license issued by DCA, these businesses must still maintain written records of their purchases and sales. Additionally, these businesses may voluntarily elect to upload information into LeadsOnline.

Sincerely,

Bob Barrows

**Bob Barrows**  
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