

Office of Inspector General
U.S. Department of Labor
200 Constitution Avenue,
N.W. Washington, D.C. 20210

February 16, 2024

Larry D. Turner, Inspector General

Dear Mr. Turner

I am a former United Airlines technician of 30 years who was terminated in November of 2021 by United Airlines. I was discriminated against by the union and the company for my religious beliefs. The Teamsters union reps allowed United Airlines to breach the United Airlines aircraft technicians CBA and Railway Labor Act (RLA) by unilaterally implementing without negotiations a company vaccine policy that discriminated against United technicians with sincerely held religious beliefs and ADA disabilities by requiring them to surrender their existing contractual rights to remain employed.

In April of 2023 I filed a federal complaint against the Teamsters union for religious discrimination and RICO violations including honest services fraud and bribery and labor union racketeering. The Defendants are Teamsters Local 986 Los Angeles, Teamsters International Union and its United Airlines union negotiators, Clacy Griswold, Robert Fisher and Vincent Graziano. During my investigation I discovered three \$1.5 million dollar payments to the Teamsters International Headquarters that are suspicious. I believe your department should review and investigate these questionable LM2 payments.

Capital One Bank \$1.5 million-dollar LM2 transactions.

During the litigation process in August of 2023, I discovered three questionable financial transactions reported in the Department of Labor OLMS Database, using the Office of Public Disclosure Room (OPDR). The Teamsters International Headquarters File # 000-093 LM2 reports show three consecutive years of \$1.5 million dollar transactions in 2020, 2021 and 2022 labeled as Capital One Bank payments.

These Capital One Bank payments to the Teamsters International Headquarters are much higher than all other Capital One Bank Affinity reward payments to other unions listed under the same Capital One Bank program. *Doc #1 Capital One Bank OLMS OPDR query report 2013-2022 DOL Payer report*

Unlike any other union in the DOL report, these Capital One Bank payments are being paid in equal and matching monthly amounts of \$125,000.00. This does not follow the established historical pattern of payments by Capital One Bank to the Teamsters or any other union for that matter.

The DOL OLMS Teamsters International Headquarters Payer report from 2009-2022 shows the union headquarters received \$56,863.00 in 2014 and \$59,519.00 in 2015 in rewards payments from Capital One Bank. For that amount to increase by a factor of twenty-five to \$1.5 million in 5 years is highly improbable.

In 2020, 2021 and 2022 the Capital One Bank payout amount increased over twenty-five times to \$1.5 million each year. All other unions in the DOL Payer Query were paid in varying amounts at much lower rates, but as stated previously these payments were paid in a uniform manner at 25 times the previous rate. These Capital One Bank \$1.5 million dollar payments should be investigated.

Capital One Bank Fined over \$390 Million dollars for Anti-Money Laundering violations.

In 2021 Capital One Bank was fined over \$390 million dollars by FinCEN the Financial Crimes Enforcement Network for Anti-Money Laundering (AML) violations. The bank admitted to willfully failing to implement and maintain effective AML procedures to guard against money laundering, also failing to file thousands of Suspicious Activity Reports for failing to follow reporting guidelines to prevent money laundering. *(Doc #5 2021-1-15 FinCEN Announces \$390,000,000 Enforcement Action Against Capital One)*

United Airlines \$1.5 million dollar payment to the Teamsters International Headquarters

Mr. Turner another reason these \$1.5 million dollar payments are questionable is the fact that the \$1.5 million dollar payments in 2020, 2021 and 2022 match a previous payment to the Teamsters International Headquarters received from United Airlines in 2017. It is a violation of the Railway Labor Act §152 Fourth for a carrier to provide financial assistance to the labor organization. It is a RICO violation for the union to accept money from an employer.

(Doc #7 Exhibit # 32 \$1.5 million dollar CBA payment)

29 U.S.C. § 186 (“Section 302”) prohibits union officers and employees from requesting or receiving any thing of value from any “interested” employer. Specifically, Section 302(a) states that no one acting in the interest of an employer may pay, lend or deliver any thing of value to certain labor representatives.

Teamsters DOJ Racketeering and Bribery Consent Decree

The Teamsters Union is currently under a Department of Justice Consent Decree for Racketeering and Bribery that prohibits any officer or representative of the union from violating any RICO Act under §1961. The acceptance of money from an employer is a violation of that act. This is outlined in my federal complaint against the Teamsters. *(Seitz v IBT Exhibit # 29 2015-1-13 Teamsters DOJ Racketeering and Bribery Consent Decree)*

Honest Services Fraud

18 U.S.C. Section 1346 - Definition of "scheme or artifice to defraud" For the purposes of this chapter, the term "scheme or artifice to defraud" includes a scheme or artifice to deprive another of the intangible right of honest services.

During the litigation process I was provided a recording of the 2016 SFO Teamsters UAL informational public union meeting held on October 18, 2016. In the meeting the Teamsters UAL Negotiating Committee members including Clacy Griswold, Bob Fisher, Vinnie Graziano and their Financial advisor Dan Akins made knowingly fraudulent statements to induce ratification of a concessionary tentative agreement during the voting process of the 2016 United Airlines CBA. This is Honest Services Fraud.

Following these fraudulent statements the Teamsters International union headquarters received a \$1.5 million dollar payment from United Airlines in June of 2017 exactly 6 months after ratification of the CBA. This \$1.5 million dollar payment was the largest payment ever received by the Teamsters International headquarters from any employer in history. This \$1.5 million dollar payment was not disclosed to the United membership or documented in the CBA.

This payment was in violation of Section 152 Fourth of the RLA which prohibits financial assistance from the carrier.. This \$1.5 million dollar payment was a violation of USC 29 186 prohibited payments to labor organizations. **(Doc #7 Exhibit # 32 \$1.5 million dollar CBA payment)**

United Airlines Company Property and Labor Hours - A thing of value

During the negotiation process of the 2016-2022 United Airlines CBA, United Airlines provided the Teamsters union representatives the use of company resources by providing company property and thousands of aircraft maintenance labor hours to conduct meetings to promote and sell a union sponsored healthcare plan known as “Teamcare”. This was a thing of value to the union received by the Teamsters from United Airlines (the carrier) during the negotiations process. This is considered a bribe by the Department of Justice.

United Airlines Department of Justice Investigations

During that same period United Airlines was forced to sign a Department of Justice Non-Prosecution Agreement (NPA) and fined millions of dollars, when it provided carrier resources which were scheduled flights to a public official for the New Jersey Port Authority to grant United Airlines the right to build a hangar at the Newark Liberty International airport.

The building of that 20-million-dollar hangar led to more charges of bribery and honest services fraud against United Airlines employees by the New Jersey Department of Justice in November of 2023.

If you read the federal complaint (Seitz v IBT 3:23-cv-01716-LB) the honest services fraud and the acceptance of money and other things of value was part of an established pattern by the Teamsters union at United Airlines.

The UAL Teamsters negotiating committee and the Teamsters Airline Division have an established pattern of committing honest services fraud to induce the ratification of a concessionary agreement at United Airlines.

Both the Teamsters union and United Airlines are or have been under scrutiny by the Department of Justice from 2013 to 2023 for racketeering, bribery and contract fraud. These DOJ cases are listed in my federal complaint.

(Seitz v IBT Exhibit # 29 2015-1-13 Teamsters DOJ Racketeering and Bribery Consent Decree)

(Exhibit #30 2016-7-11 DOJ United Airlines NPA for Bribery of a Public Official)

(Exhibit #40 2021 United Airlines to Pay \$49 Million To Resolve Criminal Fraud on United States Postal Contracts)

In November of 2023, the New Jersey Department of Justice found three United Airlines senior employees were guilty honest services fraud by accepting nearly a million dollars in money and other things of value in connection with a twenty million dollar building project in Newark. All three United Airlines employees who committed bribery and honest services fraud pled guilty.

Doc #4 U.S. Attorney's Office, District of New Jersey - Former Airline Representatives Admit Roles in Bribery Conspiracy

Questionable Financial Transactions in Teamsters Intl Headquarters DOL LM2 reports

Mr. Turner, I have attached two Department of Labor reports from the Office of Labor Management Standards (OLMS) and Online Public Disclosure Room (OPDR). Document #1 shows the disparity in Capital One Affinity payments to the Teamsters International Headquarters when compared to other unions at the same time. ***Doc #1 Capitol One Bank OLMS OPDR query report 2013-2022 DOL Payer report***

The second report Doc #2 shows a pattern of the questionable \$1.5 million dollar payments from 2020, 2021 and 2022. This continuing pattern of \$1.5 million dollar transactions listed in the Teamsters International Headquarters LM2 reports. These \$1.5 million dollar payments followed a 2017 \$1.5 million dollar CBA payment from United Airlines mentioned earlier that was in violation of USC 29 §186.

Doc #2 \$1.5 Million Transactions - OLMS OPDR query report 2008-2022 DOL Payer report to IBT Intl HQ

These Capital One Bank payments to the IBT International Headquarters are exceptional and unlike all other Capital One reward payments paid to all other unions in the Department of Labor LM-2 Payer / Payee database over the last 15 years.

These reward payments are a much higher by percentage based on union membership when compared to Capital One Bank reward payments. The per capita payments are much greater than similar reward payments made to all other unions in the DOL Payer database.

The Teamsters Department of Justice Consent decree for racketeering and bribery and the continuing pattern of \$1.5 million dollar transactions following the \$1.5 million dollar CBA payment from United Airlines in 2017 raise significant concerns.

29 U.S.C. § 186 (“Section 302”) prohibits union officers and employees from requesting or receiving any thing of value from any “interested” employer. Specifically, Section 302(a) states that no one acting in the interest of an employer may pay, lend or deliver any thing of value to certain labor representatives.

These include any representative of the employer’s employees, any officers or employees of any labor organization which “represents, seeks to represent, or would admit to members, any of the employees of such employer” or any officer or employee of any labor union if the employer intends to influence him in his duties. Section 302(a).

In addition, Section 302(b) prohibits any union officer or employee from requesting, demanding, receiving, accepting, or agreeing to receive or accept any payment, loan or other thing of value in violation of subsection (a). Violation of these provisions is a felony punishable by five years imprisonment and a fine of \$15,000. Section 302(c).

The Department of Labor should investigate these \$1.5 million dollar payments received by the Teamsters International Headquarters from United Airlines in 2017 and the questionable \$1.5 million dollar payments from Capital One Bank in 2020,2021 and 2022.

Questionable Financial Transactions at Teamsters Local 986 Los Angeles

There is an additional \$1.5 million transaction by Teamsters Local 986 Los Angeles in 2019. This \$1.5 million dollar transaction was in the form of a loan for the Teamsters Local 986 Charity fund which at that time had over \$5 million in assets and cash.

In 2019 the Teamsters Local 986 LM-2 report a \$1.5 million dollar loan taken out by Local 986 for their local charity fund which is overseen by only one local 986 officer. The Local 986 LM-2 historical records show this charity fund was over seen by three local officers previously but was reduced to the oversight of a single union officer in 2018.

Following this \$1.5 million dollar loan, there are no available publicly available filings of the Locals 990-PF report for this charity fund.

Following this \$1.5 million dollar loan the local began distributing large non-itemized payments of \$45,000.00 to \$60,000.00 based on its annual LM-2 reports in the years 2020, 2021 and 2022.

In 2019 local 986 distributed \$37,500 in non-itemized payments listed as general overhead.

Doc #3 2008-2022 DOL LM2 Report Local 986 Charity Fund Expenses

Wage Rate Transparency and LMRDA violations

As outlined in the Amended Complaint from 2010 through 2022 the Teamsters union officers named in the complaint committed RICO violations of bribery, honest services fraud and racketeering, depriving United Airlines aircraft technicians their negotiated contractual rights to be free from discrimination, a transparent wage calculation their correct hourly wages and existing pension benefits through a pattern of racketeering, bribery, fraud and concealment.

In 2018 United Airlines technicians were deprived of the right to wage transparency that cost United Airlines technicians an estimated \$3.00 per hour.

In 2020 United Airlines aircraft technicians would again be deprived of the right to the transparency of their calculated wages, with an estimated loss of \$6.00 per hour. (¶ 236

Amended Complaint Seitz v IBT 3:23-cv-01717-LB)

This Teamsters union honest services fraud resulted in 4 years of hourly wage losses for over 7500 United Airlines technicians.

Mr. Turner, in addition to these wage violations, the historical payroll records of United Airlines aircraft technicians were also altered during that time and the union committed forgery in the CBA as outlined in the complaint. (¶274 *Amended Complaint Seitz v IBT 3:23-cv-01717-LB*)

I have presented plausible federal claims against Teamsters union officers and negotiators for honest services fraud and bribery that are 1961 RICO violations, both are well supported and documented in my federal complaint.

I am asking for the Department of Labor to investigate the hourly wage fraud and the \$1.5 million dollar payment from United Airlines and the \$1.5 million dollar Capital One Affinity payments made to Teamsters International Headquarters.

LMRDA 29 U.S.C. Section 411 - Bill of rights.

United Airlines Aircraft Technicians Denied the Right to Equal Representation

Mr. Turner the LMRDA ensures that union employees have equal rights and freedom of speech to participate in membership meetings. There are 2400 United Airlines aircraft technicians located at the San Francisco Maintenance Base. Half of the membership, 1200 SFO United technicians were arbitrarily forced to be union members of Teamsters Local 986 in Los Angeles 400 miles away while the other half of aircraft technicians were placed in Teamsters Local 856 3 miles from the San Francisco Maintenance Base.

These 1200 San Francisco United Airlines aircraft technicians who were arbitrarily placed in Local 986 in Los Angeles have been denied their rights to equal representation over the last 15 years of Teamsters union representation.

Teamsters Union Defendant Clacy Griswold claimed the 1200 San Francisco United aircraft technicians were placed in Local 986 for better representation.

It is obvious this was done only to enrich these union officers four hundred miles away to defraud union members of their union dues money and deny their rights to equal union representation.

These 1200 San Francisco United aircraft technicians have been denied their intangible right to equal representation by a union with a long history of honest services fraud, labor union racketeering and bribery. This labor union denies United Airlines Aircraft technicians equal representation and participation to elect union officers and have equal representation and participation.

The United Airlines technicians in Washington Dulles International Airport and Orlando International Airport are also being similarly denied their LMRDA rights to equal representation and participation. These aircraft technicians are represented by Teamsters Locals hundreds of miles away depriving them of their right to representation and participation in the union that they pay over \$100 dollars a month in union dues. This is taxation without representation.

LMRDA 29 U.S.C. Section 411 – Union member Bill of rights

(a)(1) Equal rights

Every member of a labor organization shall have equal rights and privileges within such organization to nominate candidates, to vote in elections or referendums of the labor organization, to attend membership meetings, and to participate in the deliberations and voting upon the business of such meetings, subject to reasonable rules and regulations in such organization's constitution and bylaws.

(2) Freedom of speech and assembly

Every member of any labor organization shall have the right to meet and assemble freely with other members; and to express any views, arguments, or opinions; and to express at meetings of the labor organization his views, upon candidates in an election of the labor organization or upon any business properly before the meeting, subject to the organization's established and reasonable rules pertaining to the conduct of meetings:

Mr. Turner I would like your office to investigate the questionable \$1.5 million dollar payments and loan at Teamsters Local 986 as well as the denial of LMRDA rights to equal and fair representation for United Airlines aircraft technicians.

I will be sending a similar letter to the Teamsters Independent Investigation Officer (IIO) assigned by the Department of Justice under the 2015 Racketeering and Bribery Consent Decree.

I will also be sending a similar letter to the Department of Justice offices of California and New Jersey.

What these Local and International Teamsters union officers and negotiators have done at United Airlines affects the wages of all other aircraft technicians and the entire commercial aviation industry in the United States.

Thank you for taking the time to consider my request for a Department of Labor investigation into the suspicious financial activities surrounding the \$1.5 million dollar payments and loan outlined in this letter and the LMRDA violations of equal representation and wage transparency.

I will also attach a copy of my federal complaint against the Teamsters. If you would like a digital copy of the complaint please let me know.

Sincerely

Jim Seitz 30-year United Airlines Aircraft Technician

Jimseitz8@gmail.com

650-787-1110

**Doc #1 Capitol One Bank OLMS OPDR query report 2013-2022 DOL Payer report
Capital One Bank Payments to various labor organizations**

Report	Name	Payer /Payee	Type/Classification	Itemized	Non Itemized	Teamsters	Total	Union Name
2022 (LM2)	CAPITAL ONE BANK	PAYER	BANKING/FINANCIAL SERVICES	\$1,500,000.00	\$29,997.00	\$1,529,997.00		TEAMSTERS
2021 (LM2)	CAPITAL ONE BANK	PAYER	ROYALTIES	\$11,052.00	\$0.00		\$11,052.00	NATIONAL NURSES UNITED
2021 (LM2)	CAPITAL ONE BANK	PAYER	BANK	\$43,870.00	\$0.00		\$43,870.00	POSTAL WORKERS, AMERICAN,
2021 (LM2)	CAPITAL ONE BANK	PAYER	BANKING/FINANCIAL SERVICES	\$1,500,000.00	\$0.00	\$1,500,000.00		TEAMSTERS
2020 (LM2)	Capital One Bank (US,	PAYER	Credit Card Provider	\$5,434.00	\$0.00		\$5,434.00	LABORERS
2020 (LM2)	CAPITAL ONE BANK	PAYER	ROYALTIES	\$14,302.00	\$0.00		\$14,302.00	NATIONAL NURSES UNITED
2020 (LM2)	CAPITAL ONE BANK	PAYER	BANK	\$45,230.00	\$0.00		\$45,230.00	POSTAL WORKERS, AMERICAN,
2020 (LM2)	CAPITAL ONE BANK	PAYER	BANKING/FINANCIAL SERVICES	\$1,500,000.00	\$0.00	\$1,500,000.00		TEAMSTERS
2019 (LM2)	CAPITAL ONE BANK	PAYER	ROYALTIES	\$11,426.00	\$0.00		\$11,426.00	NATIONAL NURSES UNITED
2019 (LM2)	CAPITAL ONE BANK	PAYER	BANK	\$46,110.00	\$0.00		\$46,110.00	POSTAL WORKERS, AMERICAN,
2018 (LM2)	CAPITAL ONE BANK	PAYER	OTHER	\$13,999.00	\$0.00		\$13,999.00	NATIONAL NURSES UNITED
2017 (LM2)	CAPITAL ONE BANK	PAYER	OTHER	\$7,579.00	\$0.00		\$7,579.00	NATIONAL NURSES UNITED
2016 (LM2)	CAPITAL ONE BANK	PAYER	CREDIT CARD COMPANY	\$19,730.00	\$7,683.00		\$27,413.00	AUTO WORKERS AFL-CIO
2015 (LM2)	CAPITAL ONE BANK	PAYER	CREDIT CARD COMPANY	\$36,505.00	\$0.00		\$36,505.00	AUTO WORKERS AFL-CIO
2015 (LM2)	Capital One Bank	PAYER	Other Receipts	\$49,073.00	\$0.00		\$49,073.00	STEELWORKERS, AFL-CIO
2015 (LM2)	CAPITAL ONE BANK	PAYER	BANKING/FINANCIAL SERVICES	\$57,799.00	\$1,720.00	\$59,519.00		TEAMSTERS
2014 (LM2)	CAPITAL ONE BANK	PAYER	CREDIT CARD COMPANY	\$38,495.00	\$0.00		\$38,495.00	AUTO WORKERS AFL-CIO
2014 (LM2)	CAPITAL ONE BANK	PAYER	BANKING/FINANCIAL SERVICES	\$56,863.00	\$0.00	\$56,863.00		TEAMSTERS
2013 (LM2)	CAPITAL ONE BANK	PAYER	COMPANY	\$37,784.00	\$0.00		\$37,784.00	AUTO WORKERS AFL-CIO
2009 (LM2)	Capital One Bank	PAYER	Bank	\$50,000.00	\$0.00		\$50,000.00	LOCOMOTIVE ENGINEERS, IBT
						Teamsters	ALL Other Unions	
						\$4,646,379.00	\$438,272.00	

Doc #2 \$1.5 Million Transactions OLMS OPDR query report 2008-2022
DOL Payer report to IBT Intl HQ to IBT International Headquarters

Report	Name	Payer/Payee	Category	Type/Classification	Itemized	Non Itemized
2011 (LM2)	IBT Supplemental Benefit Trust	PAYER	OTHER RECEIPTS	Trust Fund	\$5,444,569.00	\$325.00
2018 (LM2)	NAT'L INSTITUTE OF ENVIRONMENTAL	PAYER	OTHER RECEIPTS	GOVERNMENT AGENCY	\$3,336,565.00	\$7,630.00
2008 (LM2)	SUPPLEMENTAL BENEFIT TRUST GRAN	PAYER	OTHER RECEIPTS	Trust Fund	\$2,900,000.00	\$0.00
2009 (LM2)	NIEHS	PAYER	OTHER RECEIPTS	Govt agency	\$2,832,176.00	\$3,591.00
2010 (LM2)	NEIHS	PAYER	OTHER RECEIPTS	Government Agency	\$2,795,854.00	\$20,654.00
2019 (LM2)	NAT'L INSTITUTE OF ENVIRONMENTAL	PAYER	OTHER RECEIPTS	GOVERNMENT AGENCY	\$2,798,037.00	
2017 (LM2)	NAT'L INSTITUTE OF ENVIRONMENTAL	PAYER	OTHER RECEIPTS	GOVERNMENT AGENCY	\$2,791,915.00	\$2,754.00
2007 (LM2)	Natl Institute of Environment	PAYER	OTHER RECEIPTS	Government Agency	\$2,739,737.00	\$0.00
2021 (LM2)	NAT'L INSTITUTE OF ENVIRONMENTAL	PAYER	OTHER RECEIPTS	GOVERNMENT AGENCY	\$2,689,698.00	\$38,926.00
2011 (LM2)	Nat'l Institute of Environmental Health	PAYER	OTHER RECEIPTS	Government Agency	\$2,721,292.00	\$4,970.00
2020 (LM2)	NAT'L INSTITUTE OF ENVIRONMENTAL	PAYER	OTHER RECEIPTS	GOVERNMENT AGENCY	\$2,665,804.00	\$20,726.00
2012 (LM2)	Nat'l Institute of Environment Health	PAYER	OTHER RECEIPTS	Govt Agency	\$2,590,727.00	\$10,029.00
2014 (LM2)	NAT'L INSTITUTE OF ENVIRONMENTAL	PAYER	OTHER RECEIPTS	GOVERNMENT AGENCY	\$2,549,999.00	\$10,572.00
2022 (LM2)	NAT'L INSTITUTE OF ENVIRONMENTAL	PAYER	OTHER RECEIPTS	GOVERNMENT AGENCY	\$2,556,092.00	
2008 (LM2)	NIEHS	PAYER	OTHER RECEIPTS	Labor Organization	\$2,531,500.00	\$0.00
2006 (LM2)	Tmstrs Supplemental Benefit Trust	PAYER	OTHER RECEIPTS	Affiliated Trust	\$2,469,941.00	\$0.00
2016 (LM2)	NAT'L INSTITUTE OF ENVIRONMENTAL	PAYER	OTHER RECEIPTS	GOVERNMENT AGENCY	\$2,453,395.00	\$5,369.00
2006 (LM2)	Dept Of Health & Human Services	PAYER	OTHER RECEIPTS	Government Agency	\$2,436,606.00	\$0.00
2015 (LM2)	NAT'L INSTITUTE OF ENVIRONMENTAL	PAYER	OTHER RECEIPTS	GOVERNMENT AGENCY	\$2,398,624.00	\$11,263.00
2013 (LM2)	NAT'L INSTITUTE OF ENVIRONMENTAL	PAYER	OTHER RECEIPTS	GOVERNMENT AGENCY	\$2,255,416.00	\$13,335.00
2010 (LM2)	US Dept of Transportation	PAYER	OTHER RECEIPTS	Government Agency	\$2,097,884.00	\$0.00
2007 (LM2)	Teamsters Affiliates Pension Plan	PAYER	OTHER RECEIPTS	Affiliated Trust Fund	\$1,832,186.00	\$0.00
2005 (LM2)	Teamsters Aff Pen Fd	PAYER	OTHER RECEIPTS	Teamster Affiliate	\$1,745,471.00	\$0.00

Doc #2 \$1.5 Million Transactions OLMS OPDR query report 2008-2022**DOL Payer report to IBT Intl HQ to IBT International Headquarters**

2009 (LM2)	IBT SUPPLEMENTAL BENEFIT TRUST	PAYER	OTHER RECEIPTS	Trust Fund	\$1,560,846.00	\$10.00
2006 (LM2)	Tmstrs Affiliate Pension Plan	PAYER	OTHER RECEIPTS	Affiliated Trust	\$1,542,663.00	\$0.00
2022 (LM2)	CAPITAL ONE BANK	PAYER	OTHER RECEIPTS	BANKING/FINANCIAL SERVICES	\$1,500,000.00	\$29,997.00
2008 (LM2)	TEAMSTER AFFILIATES PENSION PLAN	PAYER	OTHER RECEIPTS	Pension Fund	\$1,523,327.00	\$0.00
2010 (LM2)	Teamsters Affiliates Pension Plan	PAYER	OTHER RECEIPTS	Pension Fund	\$1,512,406.00	\$0.00
2020 (LM2)	CAPITAL ONE BANK	PAYER	OTHER RECEIPTS	BANKING/FINANCIAL SERVICES	\$1,500,000.00	
2021 (LM2)	CAPITAL ONE BANK	PAYER	OTHER RECEIPTS	BANKING/FINANCIAL SERVICES	\$1,500,000.00	\$0.00
2017 (LM2)	UNITED AIRLINES INC	PAYER	OTHER RECEIPTS	AIRLINE CARRIER	\$1,500,000.00	
2013 (LM2)	IBT SUPPLEMENTAL BENEFIT	PAYER	OTHER RECEIPTS	MEMBER BENEFIT PLAN	\$1,481,892.00	\$3,022.00
2005 (LM2)	Laborers-AGC	PAYER	OTHER RECEIPTS	Grant Administrator	\$1,478,598.00	\$1,121.00
2009 (LM2)	TEAMSTER AFFILIATES PENSION PLAN	PAYER	OTHER RECEIPTS	Pension Fund	\$1,356,248.00	\$0.00
2015 (LM2)	TEAMSTER AFFILIATES PENSION PLAN	PAYER	OTHER RECEIPTS	PENSION FUND	\$1,278,361.00	
2011 (LM2)	Teamsters Affiliates Pension Plan	PAYER	OTHER RECEIPTS	Pension Fund	\$1,260,162.00	\$3,049.00
2014 (LM2)	TEAMSTER AFFILIATES PENSION PLAN	PAYER	OTHER RECEIPTS	PENSION FUND	\$1,224,912.00	\$5,600.00
2015 (LM2)	US DEPARTMENT OF TRANSPORTATIO	PAYER	OTHER RECEIPTS	GOVERNMENT AGENCY	\$1,194,356.00	
2015 (LM2)	THE ULTIMATE SOFTWARE GROUP INC	PAYER	OTHER RECEIPTS	PAYROLL SERVICE PROVIDER	\$1,164,528.00	
2016 (LM2)	TEAMSTER AFFILIATES PENSION PLAN	PAYER	OTHER RECEIPTS	PENSION FUND	\$1,149,263.00	\$932.00
2012 (LM2)	Teamster Affiliates Pension Plan	PAYER	OTHER RECEIPTS	Pension Fund	\$1,134,071.00	\$0.00
2013 (LM2)	TEAMSTER AFFILIATES PENSION PLAN	PAYER	OTHER RECEIPTS	PENSION FUND	\$1,126,994.00	\$4,093.00
2015 (LM2)	TEAMSTERS L U NO 36	PAYER	OTHER RECEIPTS	AFFILITATE	\$1,128,910.00	
2012 (LM2)	US Department of Transportation	PAYER	OTHER RECEIPTS	Govt Agency	\$1,013,686.00	\$0.00
2018 (LM2)	PRESERVE MIDDLE CLASS AMERICA IN	PAYER	OTHER RECEIPTS	501(C) (4) NONPROFIT	\$1,000,000.00	
2021 (LM2)	US DEPARTMENT OF LABOR EMPL & T	PAYER	OTHER RECEIPTS	GOVERNMENT AGENCY	\$925,410.00	\$0.00
2013 (LM2)	HUDSON INSURANCE COMPANY	PAYER	OTHER RECEIPTS	INSURANCE COMPANY	\$913,004.00	\$0.00
2009 (LM2)	US DOT	PAYER	OTHER RECEIPTS	Govt agency	\$911,138.00	\$0.00

**Doc #2 \$1.5 Million Transactions OLMS OPDR query report 2008-2022
DOL Payer report to IBT Intl HQ to IBT International Headquarters**

2022 (LM2)	TEAMSTER AFFILIATES PENSION PLAN	PAYER	OTHER RECEIPTS	PENSION FUND	\$876,464.00	
2011 (LM2)	HMS Enterprises, Inc.	PAYER	OTHER RECEIPTS	Business Management Consulta	\$837,985.00	\$0.00
2016 (LM2)	US DEPARTMENT OF TRANSPORTATIC	PAYER	OTHER RECEIPTS	GOVERNMENT AGENCY	\$835,847.00	\$0.00
2021 (LM2)	TEAMSTER AFFILIATES PENSION PLAN	PAYER	OTHER RECEIPTS	PENSION FUND	\$806,549.00	\$7,946.00
2017 (LM2)	TEAMSTER AFFILIATES PENSION PLAN	PAYER	OTHER RECEIPTS	PENSION FUND	\$811,759.00	\$2,546.00
2018 (LM2)	TEAMSTER AFFILIATES PENSION PLAN	PAYER	OTHER RECEIPTS	PENSION FUND	\$792,253.00	\$3,975.00
2014 (LM2)	US DEPARTMENT OF TRANSPORTATIC	PAYER	OTHER RECEIPTS	GOVERNMENT AGENCY	\$786,791.00	\$8,230.00
2019 (LM2)	TEAMSTER AFFILIATES PENSION PLAN	PAYER	OTHER RECEIPTS	PENSION FUND	\$772,800.00	\$3,457.00
2013 (LM2)	US DEPARTMENT OF TRANSPORTATIC	PAYER	OTHER RECEIPTS	GOVERNMENT AGENCY	\$763,171.00	\$0.00
2020 (LM2)	TEAMSTER AFFILIATES PENSION PLAN	PAYER	OTHER RECEIPTS	PENSION FUND	\$712,593.00	\$2,506.00
2018 (LM2)	US DEPARTMENT OF LABOR EMPL & T	PAYER	OTHER RECEIPTS	GOVERNMENT AGENCY	\$691,375.00	
2019 (LM2)	US DEPARTMENT OF LABOR EMPL & T	PAYER	OTHER RECEIPTS	GOVERNMENT AGENCY	\$671,823.00	
2017 (LM2)	US DEPARTMENT OF LABOR EMPL & T	PAYER	OTHER RECEIPTS	GOVERNMENT AGENCY	\$649,228.00	
2020 (LM2)	US DEPARTMENT OF LABOR EMPL & T	PAYER	OTHER RECEIPTS	GOVERNMENT AGENCY	\$621,937.00	
2010 (LM2)	IBT Supplemental Benefit Trust	PAYER	OTHER RECEIPTS	Trust Fund	\$575,041.00	\$170.00
2014 (LM2)	GCIU/IBT CONFERENCE	PAYER	OTHER RECEIPTS	AFFILIATE	\$573,729.00	\$205.00
2013 (LM2)	IBT VOLUNTARY EMPLOYEE BENEFIT	PAYER	OTHER RECEIPTS	TRUST FUND	\$566,192.00	\$2,272.00
2011 (LM2)	US Department of Transportation	PAYER	OTHER RECEIPTS	Government Agency	\$567,536.00	\$0.00
2014 (LM2)	IBT VOLUNTARY EMPLOYEE BENEFIT	PAYER	OTHER RECEIPTS	TRUST FUND	\$496,764.00	\$6,423.00
2012 (LM2)	BMW Division	PAYER	OTHER RECEIPTS	Affiliate	\$500,000.00	\$0.00
2010 (LM2)	US Dept of Homeland Security	PAYER	OTHER RECEIPTS	Government Agency	\$499,275.00	\$360.00
2011 (LM2)	RK Corporate Productions, Inc.	PAYER	OTHER RECEIPTS	Producer	\$491,376.00	\$0.00
2021 (LM2)	RK CORPORATE PRODUCTIONS INC	PAYER	OTHER RECEIPTS	CONVENTION SERVICES	\$463,779.00	\$0.00
2017 (LM2)	GCIU/IBT CONFERENCE	PAYER	OTHER RECEIPTS	AFFILIATE	\$456,409.00	\$1,000.00
2021 (LM2)	METLIFE PROPERTY & CASUALTY INS C	PAYER	OTHER RECEIPTS	INSURANCE COMPANY	\$448,066.00	\$0.00

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2015 (LM2)	GCIU/IBT CONFERENCE	PAYER	OTHER RECEIPTS	AFFILIATE	\$446,710.00	
2015 (LM2)	IBT VOLUNTARY EMPLOYEE BENEFIT	PAYER	OTHER RECEIPTS	TRUST FUND	\$441,481.00	\$319.00
2013 (LM2)	GCIU/IBT CONFERENCE	PAYER	OTHER RECEIPTS	AFFILIATE	\$423,137.00	\$0.00
2011 (LM2)	Altshuler Berzon, LLP	PAYER	OTHER RECEIPTS	Attorney	\$420,025.00	\$0.00
2012 (LM2)	IBT Supplemental Benefit	PAYER	OTHER RECEIPTS	Member Benefit Plan	\$416,821.00	\$0.00
2010 (LM2)	Altshuler Berzon, LLP	PAYER	OTHER RECEIPTS	Law Firm	\$409,221.00	\$0.00
2020 (LM2)	GCIU/IBT CONFERENCE	PAYER	OTHER RECEIPTS	AFFILIATE	\$393,865.00	
2022 (LM2)	FARMERS INSURANCE GROUP INC.	PAYER	OTHER RECEIPTS	INSURANCE COMPANY	\$391,811.00	
2020 (LM2)	METLIFE PROPERTY & CASUALTY INS C	PAYER	OTHER RECEIPTS	INSURANCE COMPANY	\$384,387.00	\$57.00
2005 (LM2)	Teamstrs Retiremnt Fam Pen Fnd	PAYER	OTHER RECEIPTS	Teamster Affiliate	\$382,858.00	\$0.00
2018 (LM2)	GCIU/IBT CONFERENCE	PAYER	OTHER RECEIPTS	AFFILIATE	\$382,575.00	
2012 (LM2)	IBT Voluntary Employee Benefit	PAYER	OTHER RECEIPTS	Trust Fund	\$378,282.00	\$2,359.00
2016 (LM2)	IBT VOLUNTARY EMPLOYEE BENEFIT	PAYER	OTHER RECEIPTS	TRUST FUND	\$377,307.00	\$3,083.00
2014 (LM2)	IBT SUPPLEMENTAL BENEFIT	PAYER	OTHER RECEIPTS	MEMBER BENEFIT PLAN	\$371,749.00	\$3,352.00
2016 (LM2)	GCIU/IBT CONFERENCE	PAYER	OTHER RECEIPTS	AFFILITATE	\$346,266.00	\$3,113.00
2022 (LM2)	GCIU/IBT CONFERENCE	PAYER	OTHER RECEIPTS	AFFILIATE	\$345,937.00	
2008 (LM2)	IBT SUPPLEMENTAL BENEFIT TRUST	PAYER	OTHER RECEIPTS	Trust Fund	\$341,393.00	\$2,000.00
2010 (LM2)	IBT Voluntary Employee Benefit	PAYER	OTHER RECEIPTS	Trust Fund	\$335,893.00	\$0.00
2013 (LM2)	MAEVA GROUP LLC	PAYER	OTHER RECEIPTS	CORPORATE RESTRUCTURING S	\$327,921.00	\$0.00
2021 (LM2)	GCIU/IBT CONFERENCE	PAYER	OTHER RECEIPTS	AFFILIATE	\$321,441.00	\$1,000.00
2011 (LM2)	IBT Voluntary Employee Benefit	PAYER	OTHER RECEIPTS	Trust Fund	\$320,876.00	\$0.00
2016 (LM2)	IBT SUPPLEMENTAL BENEFIT	PAYER	OTHER RECEIPTS	MEMBER BENEFIT PLAN	\$317,387.00	\$3,138.00
2022 (LM2)	LU 174 STRIKING WRKRS ASST FUND	PAYER	OTHER RECEIPTS	AFFILIATE	\$316,600.00	
2016 (LM2)	GOVERNMENT OF THE DISTRICT OF C	PAYER	OTHER RECEIPTS	GOVERNMENT AGENCY	\$312,891.00	\$248.00
2015 (LM2)	IBT SUPPLEMENTAL BENEFIT	PAYER	OTHER RECEIPTS	MEMBER BENEFIT PLAN	\$306,462.00	

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2005 (LM2)	TEAMSTERS CANADA	PAYER	OTHER RECEIPTS	Teamster Conference	\$305,197.00	\$495.00
2017 (LM2)	IBT SUPPLEMENTAL BENEFIT	PAYER	OTHER RECEIPTS	MEMBER BENEFIT PLAN	\$304,073.00	
2014 (LM2)	HOGG ROBINSON USA LLC	PAYER	OTHER RECEIPTS	EXECUTIVE TRAVEL SERVICES	\$293,510.00	
2022 (LM2)	RETIREMENT & FAMILY PROTECTION I	PAYER	OTHER RECEIPTS	PENSION FUND	\$292,455.00	\$438.00
2020 (LM2)	IBT VOLUNTARY EMPLOYEE BENEFIT	PAYER	OTHER RECEIPTS	TRUST FUND	\$290,070.00	
2014 (LM2)	RICOH	PAYER	OTHER RECEIPTS	OFFICE EQUIPMENT DISTRIBUTO	\$288,087.00	
2019 (LM2)	GCIU/IBT CONFERENCE	PAYER	OTHER RECEIPTS	AFFILIATE	\$284,652.00	
2022 (LM2)	IBT VOLUNTARY EMPLOYEE BENEFIT	PAYER	OTHER RECEIPTS	TRUST FUND	\$283,565.00	\$179.00
2019 (LM2)	RETIREMENT & FAMILY PROTECTION I	PAYER	OTHER RECEIPTS	PENSION FUND	\$274,781.00	\$2,117.00
2021 (LM2)	NAS INSURANCE SERVICES, LLC	PAYER	OTHER RECEIPTS	INSURANCE COMPANY	\$275,324.00	\$0.00
2017 (LM2)	CAESARS ENTERPRISE SERVICES LLC	PAYER	OTHER RECEIPTS	HOTEL/HOSPITALITY	\$272,421.00	\$431.00
2018 (LM2)	RETIREMENT & FAMILY PROTECTION I	PAYER	OTHER RECEIPTS	PENSION FUND	\$267,840.00	\$3,212.00
2019 (LM2)	IBT VOLUNTARY EMPLOYEE BENEFIT	PAYER	OTHER RECEIPTS	TRUST FUND	\$270,698.00	
2007 (LM2)	IBT VEBA	PAYER	OTHER RECEIPTS	Benefit Trust Fund	\$267,039.00	\$0.00
2021 (LM2)	IBT VOLUNTARY EMPLOYEE BENEFIT	PAYER	OTHER RECEIPTS	TRUST FUND	\$266,001.00	\$0.00
2014 (LM2)	HUDSON INSURANCE COMPANY	PAYER	OTHER RECEIPTS	INSURANCE COMPANY	\$265,000.00	
2007 (LM2)	IBT Suppl Trust Fund	PAYER	OTHER RECEIPTS	Benefit Trust Fund	\$259,412.00	\$788.00
2017 (LM2)	RETIREMENT & FAMILY PROTECTION I	PAYER	OTHER RECEIPTS	PENSION FUND	\$255,958.00	\$2,709.00
2020 (LM2)	RETIREMENT & FAMILY PROTECTION I	PAYER	OTHER RECEIPTS	PENSION FUND	\$256,372.00	\$818.00
2021 (LM2)	RETIREMENT & FAMILY PROTECTION I	PAYER	OTHER RECEIPTS	PENSION FUND	\$255,048.00	\$1,061.00
2007 (LM2)	Retirement & Family Prot Plan	PAYER	OTHER RECEIPTS	Affiliated Trust Fund	\$252,743.00	\$911.00
2013 (LM2)	RETIREMENT & FAMILY PROTECTION I	PAYER	OTHER RECEIPTS	PENSION FUND	\$247,797.00	\$2,121.00
2018 (LM2)	IBT VOLUNTARY EMPLOYEE BENEFIT	PAYER	OTHER RECEIPTS	TRUST FUND	\$238,893.00	\$1,782.00
2009 (LM2)	RETIREMENT AND FAMILY PROTECTIO	PAYER	OTHER RECEIPTS	Pension Fund	\$235,400.00	\$1,833.00
2019 (LM2)	IBT SUPPLEMENTAL BENEFIT	PAYER	OTHER RECEIPTS	MEMBER BENEFIT PLAN	\$235,677.00	

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2012 (LM2)	Retirement and Family Protection Plan	PAYER	OTHER RECEIPTS	Pension Fund	\$228,988.00	\$2,713.00
2008 (LM2)	IBT VOLUNTARY EMPLOYEE BENEFIT TRUST	PAYER	OTHER RECEIPTS	Trust Fund	\$230,720.00	\$875.00
2012 (LM2)	Meeting Management Services, Inc	PAYER	OTHER RECEIPTS	Meeting and Event Service	\$228,369.00	\$0.00
2009 (LM2)	US Dept. of Homeland Security (FEMA)	PAYER	OTHER RECEIPTS	Govt agency	\$227,972.00	\$0.00
2015 (LM2)	RETIREMENT & FAMILY PROTECTION PLAN	PAYER	OTHER RECEIPTS	PENSION FUND	\$224,919.00	\$1,636.00
2017 (LM2)	IBT VOLUNTARY EMPLOYEE BENEFIT TRUST	PAYER	OTHER RECEIPTS	TRUST FUND	\$222,467.00	\$1,708.00
2006 (LM2)	Tmstrs Voluntary Employee Benefit Trust	PAYER	OTHER RECEIPTS	Affiliated Trust	\$220,220.00	\$582.00
2008 (LM2)	RETIREMENT AND FAMILY PROTECTION PLAN	PAYER	OTHER RECEIPTS	Pension Fund	\$214,062.00	\$0.00
2010 (LM2)	Retrmnt & Fam Protectn Plan	PAYER	OTHER RECEIPTS	Pension Fund	\$210,958.00	\$1,933.00
2010 (LM2)	Zurich American Insurance Co.	PAYER	OTHER RECEIPTS	Insurance Agency	\$208,859.00	\$0.00
2022 (LM2)	HOGG ROBINSON USA LLC	PAYER	OTHER RECEIPTS	EXECUTIVE TRAVEL SERVICES	\$200,425.00	\$5,701.00
2013 (LM2)	LEVY RATNER, P.C. IOLA ACCT	PAYER	OTHER RECEIPTS	LAW FIRM	\$203,708.00	\$0.00
2018 (LM2)	IBT SUPPLEMENTAL BENEFIT TRUST	PAYER	OTHER RECEIPTS	MEMBER BENEFIT PLAN	\$199,002.00	
2016 (LM2)	JAMES R HOFFA MEMORIAL SCHOLARSHIP FUND	PAYER	OTHER RECEIPTS	SCHOLARSHIP FUND	\$195,786.00	
2016 (LM2)	RETIREMENT & FAMILY PROTECTION PLAN	PAYER	OTHER RECEIPTS	PENSION FUND	\$191,990.00	\$1,536.00
2022 (LM2)	US TREASURY DEPARTMENT	PAYER	OTHER RECEIPTS	GOVERNMENT AGENCY	\$179,972.00	\$13,264.00
2006 (LM2)	Pacificare	PAYER	OTHER RECEIPTS	Insurance Co	\$191,888.00	\$0.00
2005 (LM2)	Trustmark Insurance Company	PAYER	OTHER RECEIPTS	Insurance Company	\$190,603.00	\$0.00
2014 (LM2)	RETIREMENT & FAMILY PROTECTION PLAN	PAYER	OTHER RECEIPTS	PENSION FUND	\$185,000.00	\$1,995.00
2017 (LM2)	CHANGE TO WIN	PAYER	OTHER RECEIPTS	AFFILIATE	\$186,962.00	
2011 (LM2)	Retirement & Family Protection Plan	PAYER	OTHER RECEIPTS	Pension Fund	\$180,000.00	\$5,863.00
2021 (LM2)	US TREASURY DEPARTMENT	PAYER	OTHER RECEIPTS	GOVERNMENT AGENCY	\$181,062.00	\$0.00
2005 (LM2)	IBT Supplemental Benefit Trust	PAYER	OTHER RECEIPTS	Teamster Affiliate	\$180,834.00	\$0.00
2009 (LM2)	THE WASHINGTON COURT HOTEL	PAYER	OTHER RECEIPTS	Hotel	\$170,388.00	\$0.00
2020 (LM2)	HOGG ROBINSON USA LLC	PAYER	OTHER RECEIPTS	EXECUTIVE TRAVEL SERVICES	\$169,145.00	

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2014 (LM2)	CHANGE TO WIN	PAYER	OTHER RECEIPTS	AFFILIATE	\$155,261.00	
2012 (LM2)	HMS Enterprises, Inc	PAYER	OTHER RECEIPTS	Business Consultant	\$154,528.00	\$0.00
2013 (LM2)	FIFTH THIRD BANK	PAYER	OTHER RECEIPTS	BANKING/FINANCIAL SERVICES	\$154,212.00	\$0.00
2010 (LM2)	Amalgamated Bank	PAYER	OTHER RECEIPTS	Bank	\$152,000.00	\$0.00
2009 (LM2)	IBT VOLUNTARY EMPLOYEE BENEFIT T	PAYER	OTHER RECEIPTS	Trust Fund	\$151,355.00	\$68.00
2008 (LM2)	TEAMSTERS NAT'L PIPELINE TRAINING	PAYER	OTHER RECEIPTS	Labor Organization	\$138,155.00	\$11,918.00
2022 (LM2)	BAKERY & LAUNDRY CONF	PAYER	OTHER RECEIPTS	AFFILIATE	\$150,000.00	
2012 (LM2)	TEAMSTERS LU NO 817	PAYER	OTHER RECEIPTS	Affiliate	\$150,000.00	\$0.00
2009 (LM2)	EXECUTIVE TRAVEL ASSOCIATES	PAYER	OTHER RECEIPTS	Consultant	\$148,184.00	\$45.00
2015 (LM2)	CHANGE TO WIN	PAYER	OTHER RECEIPTS	AFFILIATE	\$143,547.00	
2009 (LM2)	FONTAINEBLEAU MIAMI BEACH	PAYER	OTHER RECEIPTS	Hotel	\$143,188.00	\$0.00
2020 (LM2)	UNITED BANK	PAYER	OTHER RECEIPTS	BANKING/FINANCIAL SERVICES	\$141,834.00	
2014 (LM2)	UNITED AIRLINES INC	PAYER	OTHER RECEIPTS	AIRLINE	\$141,378.00	
2019 (LM2)	HOGG ROBINSON USA LLC	PAYER	OTHER RECEIPTS	EXECUTIVE TRAVEL SERVICES	\$139,919.00	
2005 (LM2)	IBT VEBA	PAYER	OTHER RECEIPTS	Teamster Affiliate	\$138,256.00	\$0.00
2019 (LM2)	UNITED BANK	PAYER	OTHER RECEIPTS	BANKING/FINANCIAL SERVICES	\$137,271.00	
2017 (LM2)	HOGG ROBINSON USA LLC	PAYER	OTHER RECEIPTS	EXECUTIVE TRAVEL SERVICES	\$132,718.00	\$3,856.00
2018 (LM2)	HOGG ROBINSON USA LLC	PAYER	OTHER RECEIPTS	EXECUTIVE TRAVEL SERVICES	\$135,587.00	
2016 (LM2)	TEAMSTERS NATIONAL PIPELINE TRAIL	PAYER	OTHER RECEIPTS	AFFILITATE	\$130,439.00	\$3,119.00
2020 (LM2)	NAS INSURANCE SERVICES, LLC	PAYER	OTHER RECEIPTS	INSURANCE COMPANY	\$133,446.00	
2016 (LM2)	US DEPARTMENT OF LABOR EMPL & T	PAYER	OTHER RECEIPTS	GOVERNMENT AGENCY	\$127,955.00	\$3,420.00
2016 (LM2)	RK CORPORATE PRODUCTIONS, INC	PAYER	OTHER RECEIPTS	PRODUCTION CORPORATION	\$124,708.00	
2018 (LM2)	UNITED BANK	PAYER	OTHER RECEIPTS	BANKING/FINANCIAL SERVICES	\$120,682.00	
2006 (LM2)	Change To Win	PAYER	OTHER RECEIPTS	Affiliate	\$119,755.00	\$0.00
2017 (LM2)	UNITED BANK	PAYER	OTHER RECEIPTS	BANKING/FINANCIAL SERVICES	\$115,741.00	

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2016 (LM2)	HOGG ROBINSON USA LLC	PAYER	OTHER RECEIPTS	EXECUTIVE TRAVEL SERVICES	\$110,675.00	\$4,357.00
2018 (LM2)	CHANGE TO WIN	PAYER	OTHER RECEIPTS	AFFILIATE	\$112,500.00	
2016 (LM2)	CHANGE TO WIN	PAYER	OTHER RECEIPTS	AFFILIATE	\$110,367.00	
2015 (LM2)	HOGG ROBINSON USA LLC	PAYER	OTHER RECEIPTS	EXECUTIVE TRAVEL SERVICES	\$103,846.00	\$3,312.00
2008 (LM2)	TEAMSTERS L U NO 320	PAYER	OTHER RECEIPTS	Affiliate	\$100,000.00	\$2,685.00
2012 (LM2)	TEAMSTERS LU NO 320	PAYER	OTHER RECEIPTS	Affiliate	\$100,000.00	\$1,200.00
2015 (LM2)	TMSTRS NATL PIPE LN TRAIN FUND	PAYER	OTHER RECEIPTS	LABOR RELATED ORGANIZATION	\$89,884.00	\$11,199.00
2013 (LM2)	MEETING MANAGEMENT SERVICES, INC	PAYER	OTHER RECEIPTS	MEETING & EVENT SERVICE	\$95,051.00	\$5,506.00
2008 (LM2)	TEAMSTERS L U NO 210	PAYER	OTHER RECEIPTS	Affiliate	\$100,000.00	\$500.00
2014 (LM2)	GOOD FRIENDS MEDIA, LLC	PAYER	OTHER RECEIPTS	BROADCAST MEDIA	\$100,000.00	
2018 (LM2)	NBC UNIVERSAL, LLC	PAYER	OTHER RECEIPTS	MEDIA CORPORATION	\$100,000.00	
2008 (LM2)	TEAMSTERS L U NO 399	PAYER	OTHER RECEIPTS	Affiliate	\$100,000.00	\$0.00
2008 (LM2)	TEAMSTERS L U NO 817	PAYER	OTHER RECEIPTS	Affiliate	\$100,000.00	\$0.00
2012 (LM2)	TEAMSTERS LU NO 210	PAYER	OTHER RECEIPTS	Affiliate	\$100,000.00	\$0.00
2006 (LM2)	Retirement & Family Prot Plan	PAYER	OTHER RECEIPTS	Affiliated Trust	\$97,763.00	\$0.00
2018 (LM2)	CAESARS ENTERPRISE SERVICES LLC	PAYER	OTHER RECEIPTS	HOTEL/HOSPITALITY	\$95,873.00	\$624.00
2019 (LM2)	GOVERNMENT OF THE DISTRICT OF COLO	PAYER	OTHER RECEIPTS	GOVERNMENT AGENCY	\$95,696.00	\$225.00
2010 (LM2)	Harrah's Operating Co., Inc.	PAYER	OTHER RECEIPTS	Executive Travel	\$92,106.00	\$0.00
2009 (LM2)	CHANGE TO WIN	PAYER	OTHER RECEIPTS	Labor Organization	\$91,036.00	\$613.00
2006 (LM2)	Executive Travel Associates	PAYER	OTHER RECEIPTS	Travel Agency	\$90,753.00	\$0.00
2019 (LM2)	WELLS FARGO BANK, NA	PAYER	OTHER RECEIPTS	BANKING/FINANCIAL SERVICES	\$90,650.00	
2013 (LM2)	JAMES R HOFFA MEMORIAL SCHOLAR	PAYER	OTHER RECEIPTS	SCHOLARSHIP FUND	\$89,307.00	\$0.00
2013 (LM2)	AT&T GLOBAL CUSTOMER CARE CENT	PAYER	OTHER RECEIPTS	TELEPHONE COMPANY	\$88,394.00	\$0.00
2016 (LM2)	TEAMSTERS LU NO 1224	PAYER	OTHER RECEIPTS	AFFILITATE	\$87,501.00	\$250.00
2009 (LM2)	ZURICH	PAYER	OTHER RECEIPTS	Insurance Agency	\$85,935.00	\$0.00

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2013 (LM2)	THE HARTFORD INSURANCE GROUP	PAYER	OTHER RECEIPTS	INSURANCE COMPANY	\$85,410.00	\$333.00
2022 (LM2)	TMSTRS LU 817	PAYER	OTHER RECEIPTS	AFFILIATE	\$85,000.00	
2010 (LM2)	The Hartford	PAYER	OTHER RECEIPTS	Insurance Agency	\$84,878.00	\$0.00
2006 (LM2)	DMT Services LLC	PAYER	OTHER RECEIPTS	Vendor	\$83,304.00	\$0.00
2009 (LM2)	AT&T	PAYER	OTHER RECEIPTS	Telephone	\$82,740.00	\$34.00
2021 (LM2)	HOGG ROBINSON USA LLC	PAYER	OTHER RECEIPTS	EXECUTIVE TRAVEL SERVICES	\$78,727.00	\$3,986.00
2020 (LM2)	TMSTRS JC 80	PAYER	OTHER RECEIPTS	AFFILIATE	\$81,424.00	\$83.00
2019 (LM2)	THE HARTFORD INSURANCE GROUP	PAYER	OTHER RECEIPTS	INSURANCE COMPANY	\$81,450.00	
2008 (LM2)	THE LENKIN COMPANY	PAYER	OTHER RECEIPTS	Building Contractor	\$80,809.00	\$0.00
2022 (LM2)	GOVERNMENT OF THE DC OFFICE OF TH	PAYER	OTHER RECEIPTS	GOVERNMENT AGENCY	\$79,886.00	\$172.00
2019 (LM2)	REVOLUTION MESSAGING LLC	PAYER	OTHER RECEIPTS	MARKETING/ADVERTISING	\$79,705.00	
2008 (LM2)	HSBC CARD SERVICES	PAYER	OTHER RECEIPTS	Bank	\$77,525.00	\$0.00
2009 (LM2)	MEEMS	PAYER	OTHER RECEIPTS	Travel	\$76,540.00	\$0.00
2018 (LM2)	WSTN - FT. LAUDERDALE (PFL VII, LLC)	PAYER	OTHER RECEIPTS	HOTEL/HOSPITALITY	\$74,791.00	\$1,714.00
2017 (LM2)	TEAMSTERS CANADA	PAYER	OTHER RECEIPTS	AFFILIATE	\$75,630.00	\$382.00
2012 (LM2)	GCIU/IBT Conference	PAYER	OTHER RECEIPTS	Affiliate	\$73,351.00	\$2,550.00
2005 (LM2)	AFL-CIO	PAYER	OTHER RECEIPTS	International Labor Union	\$75,000.00	\$0.00
2022 (LM2)	PAYER MATRIX, LLC	PAYER	OTHER RECEIPTS	SPECIALTY DRUG COST	\$75,000.00	
2022 (LM2)	PETER PALANDJIAN	PAYER	OTHER RECEIPTS	ENTREPRENEUR	\$75,000.00	
2006 (LM2)	Teamsters Local Union No. 210	PAYER	OTHER RECEIPTS	Affiliate	\$75,000.00	\$0.00
2022 (LM2)	TEAMSTERS LOCAL 986 CHARITY FUNI	PAYER	OTHER RECEIPTS	CHARITABLE FUND	\$75,000.00	
2022 (LM2)	TMSTRS LU 728	PAYER	OTHER RECEIPTS	AFFILIATE	\$75,000.00	
2008 (LM2)	UNITED STATES TREASURY	PAYER	OTHER RECEIPTS	Government Agency	\$71,717.00	\$2,480.00
2018 (LM2)	HILTON - MEMPHIS SHARED SERVICES	PAYER	OTHER RECEIPTS	HOTEL/HOSPITALITY	\$67,967.00	\$5,193.00
2006 (LM2)	Marsh USA Inc.	PAYER	OTHER RECEIPTS	Insurance Co	\$72,293.00	\$218.00

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2010 (LM2)	HSBC Holdings plc	PAYER	OTHER RECEIPTS	Bank	\$72,056.00	\$0.00
2005 (LM2)	Zurich American Insurance CO	PAYER	OTHER RECEIPTS	Insurance Company	\$63,507.00	\$7,324.00
2012 (LM2)	TEAMSTERS JC NO 87	PAYER	OTHER RECEIPTS	Affiliate	\$70,000.00	\$0.00
2015 (LM2)	CAESARS ENTERPRISE SERVICES LLC	PAYER	OTHER RECEIPTS	HOTEL/HOSPITALITY	\$64,773.00	\$4,475.00
2012 (LM2)	Peake Delancey Printers, LLC	PAYER	OTHER RECEIPTS	Printing Company	\$68,145.00	\$0.00
2014 (LM2)	MEETING MANAGEMENT SERVICES, IN	PAYER	OTHER RECEIPTS	MEETING & EVENT SERVICE	\$65,737.00	
2008 (LM2)	ALTSHULER BERZON, LLP	PAYER	OTHER RECEIPTS	Law Firm	\$63,686.00	\$0.00
2022 (LM2)	TMSTRS JC 28	PAYER	OTHER RECEIPTS	AFFILIATE	\$62,296.00	
2005 (LM2)	HSBC	PAYER	OTHER RECEIPTS	Credit Card Bank	\$61,625.00	\$0.00
2006 (LM2)	Household Bank	PAYER	OTHER RECEIPTS	Credit Card	\$61,164.00	\$0.00
2017 (LM2)	US DEPARTMENT OF TRANSPORTATION	PAYER	OTHER RECEIPTS	GOVERNMENT AGENCY	\$59,498.00	\$1,662.00
2012 (LM2)	HSBC Holdings plc	PAYER	OTHER RECEIPTS	Banking/Financial Services	\$59,699.00	\$0.00
2015 (LM2)	CAPITAL ONE BANK	PAYER	OTHER RECEIPTS	BANKING/FINANCIAL SERVICES	\$57,799.00	\$1,720.00
2012 (LM2)	Hilton Worldwide - Memphis, TN	PAYER	OTHER RECEIPTS	Hotel/Hospitality	\$52,623.00	\$6,448.00
2015 (LM2)	XEROX CORPORATION	PAYER	OTHER RECEIPTS	OFFICE EQUIPMENT DISTRIBUTION	\$46,610.00	\$10,461.00
2014 (LM2)	CAPITAL ONE BANK	PAYER	OTHER RECEIPTS	BANKING/FINANCIAL SERVICES	\$56,863.00	
2017 (LM2)	HYATT SHARED SERVICE CENTER	PAYER	OTHER RECEIPTS	HOTEL/HOSPITALITY	\$54,554.00	\$2,252.00
2011 (LM2)	HSBC Holdings PLC	PAYER	OTHER RECEIPTS	Bank	\$56,550.00	\$0.00
2019 (LM2)	CAESARS ENTERPRISE SERVICES LLC	PAYER	OTHER RECEIPTS	HOTEL/HOSPITALITY	\$55,243.00	\$584.00
2008 (LM2)	TEAMSTERS L U NO 572	PAYER	OTHER RECEIPTS	Affiliate	\$55,000.00	\$485.00
2022 (LM2)	UNITED BANK	PAYER	OTHER RECEIPTS	BANKING/FINANCIAL SERVICES	\$55,464.00	
2012 (LM2)	TEAMSTERS LU NO 117	PAYER	OTHER RECEIPTS	Affiliate	\$55,000.00	\$0.00
2008 (LM2)	INT'L BROTHERHOOD OF TEAMSTERS	PAYER	OTHER RECEIPTS	Labor Organization	\$51,768.00	\$3,000.00
2015 (LM2)	JAMES R HOFFA MEMORIAL SCHOLAR	PAYER	OTHER RECEIPTS	SCHOLARSHIP FUND	\$54,109.00	\$50.00
2013 (LM2)	CAPITAL ONE	PAYER	OTHER RECEIPTS	BANKING/FINANCIAL SERVICES	\$54,083.00	\$0.00

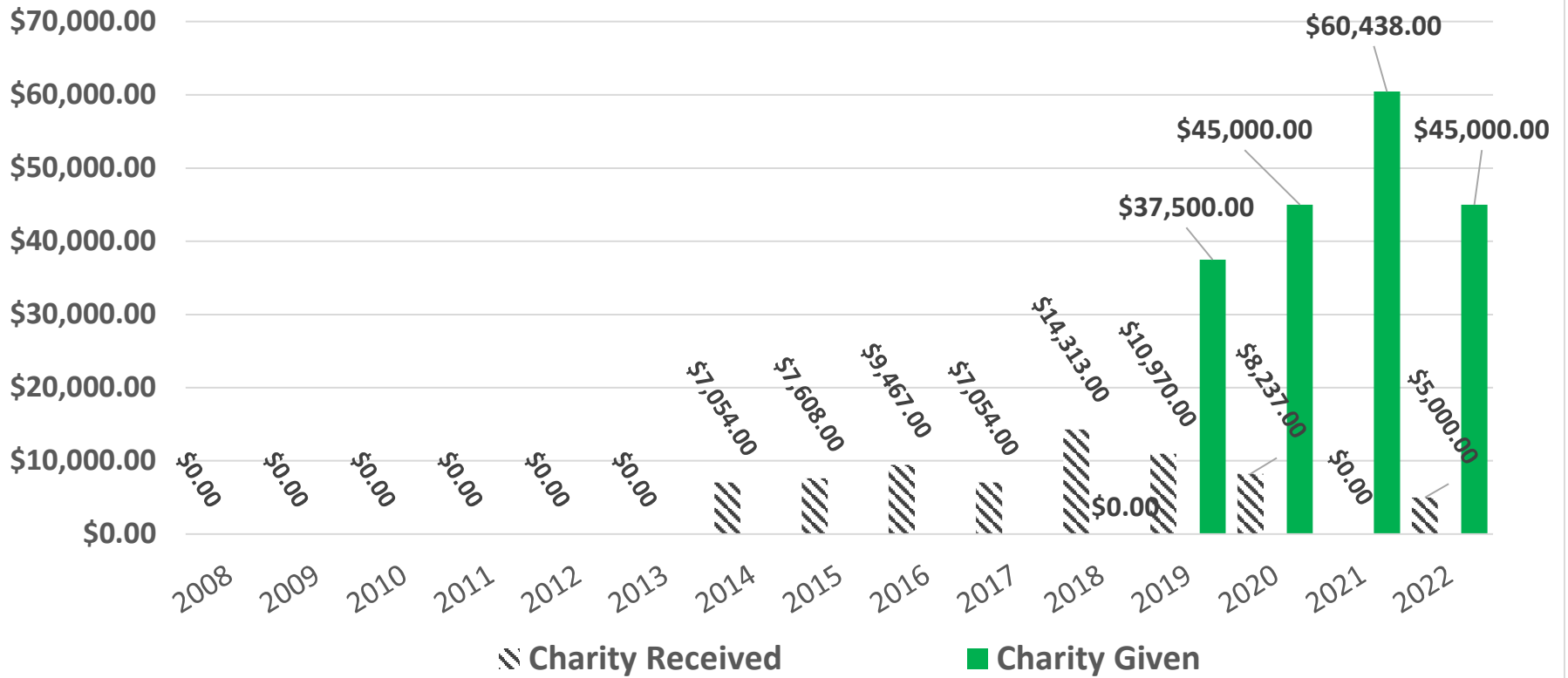
**Doc #2 \$1.5 Million Transactions OLMS OPDR query report 2008-2022
DOL Payer report to IBT Intl HQ to IBT International Headquarters**

2008 (LM2)	TEAMSTERS L U NO 79	PAYER	OTHER RECEIPTS	Affiliate	\$53,472.00	\$325.00
2005 (LM2)	TEAMSTERS L U NO 97	PAYER	OTHER RECEIPTS	Teamster Local Union	\$50,000.00	\$3,420.00
2006 (LM2)	Teamsters Local Union No. 572	PAYER	OTHER RECEIPTS	Affiliate	\$50,000.00	\$3,220.00
2010 (LM2)	Graphic Arts Industry Jnt Pen T	PAYER	OTHER RECEIPTS	Pension Fund	\$0.00	\$53,169.00
2011 (LM2)	Graphic Arts Industry Jnt Pen T	PAYER	OTHER RECEIPTS	Pension Fund	\$8,490.00	\$44,488.00
2008 (LM2)	TEAMSTERS L U NO 301	PAYER	OTHER RECEIPTS	Affiliate	\$50,000.00	\$2,750.00
2008 (LM2)	TEAMSTERS J C NO 32	PAYER	OTHER RECEIPTS	Affiliate	\$50,000.00	\$2,645.00
2010 (LM2)	United States Postal Service	PAYER	OTHER RECEIPTS	Postal Service	\$50,000.00	\$2,633.00
2006 (LM2)	Teamsters Local Union No. 396	PAYER	OTHER RECEIPTS	Affiliate	\$50,000.00	\$2,077.00
2008 (LM2)	TEAMSTERS L U NO 346	PAYER	OTHER RECEIPTS	Affiliate	\$50,000.00	\$1,750.00
2013 (LM2)	HOGG ROBINSON USA LLC	PAYER	OTHER RECEIPTS	EXECUTIVE TRAVEL SERVICES	\$51,355.00	\$0.00
2006 (LM2)	Prescription Solutions	PAYER	OTHER RECEIPTS	Insurance Co	\$50,884.00	\$0.00
2008 (LM2)	TEAMSTERS L U NO 639	PAYER	OTHER RECEIPTS	Affiliate	\$50,000.00	\$586.00
2008 (LM2)	TEAMSTERS L U NO 396	PAYER	OTHER RECEIPTS	Affiliate	\$50,000.00	\$575.00
2008 (LM2)	TEAMSTERS L U NO 633	PAYER	OTHER RECEIPTS	Affiliate	\$50,000.00	\$360.00
2006 (LM2)	Teamsters Local Union No. 30	PAYER	OTHER RECEIPTS	Affiliate	\$50,000.00	\$251.00
2008 (LM2)	TEAMSTERS L U NO 853	PAYER	OTHER RECEIPTS	Affiliate	\$50,000.00	\$183.00
2006 (LM2)	Teamsters Local Union No. 211	PAYER	OTHER RECEIPTS	Affiliate	\$50,000.00	\$17.00
2007 (LM2)	Baptiste & Wilder CP	PAYER	OTHER RECEIPTS	Legal Firm	\$50,000.00	\$0.00
2008 (LM2)	EXECUTIVE TRAVEL ASSOCIATES	PAYER	OTHER RECEIPTS	Consultant	\$50,000.00	\$0.00
2008 (LM2)	FONTAINEBLEAU MIAMI BEACH	PAYER	OTHER RECEIPTS	Hotel	\$50,000.00	\$0.00
2006 (LM2)	Teamsters Joint Council No. 41	PAYER	OTHER RECEIPTS	Affiliate	\$50,000.00	\$0.00
2008 (LM2)	TEAMSTERS J C NO 16	PAYER	OTHER RECEIPTS	Affiliate	\$50,000.00	\$0.00
2008 (LM2)	TEAMSTERS L U NO 638	PAYER	OTHER RECEIPTS	Affiliate	\$50,000.00	\$0.00
2005 (LM2)	TEAMSTERS L U NO 817	PAYER	OTHER RECEIPTS	Teamster Local Union	\$50,000.00	\$0.00

**Doc #2 \$1.5 Million Transactions OLMS OPDR query report 2008-2022
DOL Payer report to IBT Intl HQ to IBT International Headquarters**

2022 (LM2)	TEAMSTERS LOCAL 399 CHARITY FUNI	PAYER	OTHER RECEIPTS	CHARITABLE FUND	\$50,000.00	
2012 (LM2)	TEAMSTERS LU NO 676	PAYER	OTHER RECEIPTS	Affiliate	\$50,000.00	\$0.00
2012 (LM2)	TEAMSTERS LU NO 728	PAYER	OTHER RECEIPTS	Affiliate	\$50,000.00	\$0.00
2005 (LM2)	Prescription Solutions	PAYER	OTHER RECEIPTS	Benefits Provider	\$45,608.00	\$3,410.00
2012 (LM2)	Teamsters Canada	PAYER	OTHER RECEIPTS	Affiliate	\$45,000.00	\$4,000.00
2018 (LM2)	HYATT SHARED SERVICE CENTER	PAYER	OTHER RECEIPTS	HOTEL/HOSPITALITY	\$48,888.00	
2009 (LM2)	THE HARTFORD	PAYER	OTHER RECEIPTS	Insurance Agency	\$46,452.00	\$2,231.00
2007 (LM2)	J R Hoffa Mem Scholarship Fund	PAYER	OTHER RECEIPTS	Affiliated Scholarship Fund	\$48,445.00	\$0.00
2016 (LM2)	STARWOOD HOTELS & RESORTS	PAYER	OTHER RECEIPTS	HOTEL/HOSPITALITY	\$48,434.00	
2015 (LM2)	TEAMSTERS BENEFIT TRUST	PAYER	OTHER RECEIPTS	HEALTH INSURANCE TRUST	\$44,460.00	\$3,464.00
2021 (LM2)	TMSTR-NATL 401K SAVING PLAN	PAYER	OTHER RECEIPTS	PENSION FUND	\$47,057.00	\$0.00
2006 (LM2)	Teamsters Local Union No. 295	PAYER	OTHER RECEIPTS	Affiliate	\$0.00	\$46,500.00
2014 (LM2)	THE HARTFORD INSURANCE GROUP	PAYER	OTHER RECEIPTS	INSURANCE COMPANY	\$46,205.00	
2021 (LM2)	UNITED BANK	PAYER	OTHER RECEIPTS	BANKING/FINANCIAL SERVICES	\$45,512.00	\$0.00
2014 (LM2)	TEAMSTERS L U NO 210	PAYER	OTHER RECEIPTS	AFFILIATE	\$40,000.00	\$5,469.00
2016 (LM2)	CAPITAL ONE	PAYER	OTHER RECEIPTS	BANKING/FINANCIAL SERVICES	\$41,877.00	\$3,028.00
2015 (LM2)	THE HARTFORD INSURANCE GROUP	PAYER	OTHER RECEIPTS	INSURANCE COMPANY	\$43,026.00	
2015 (LM2)	DAVIS BETHUNE AND JONES, LAW OFI	PAYER	OTHER RECEIPTS	LAW FIRM	\$41,638.00	
2020 (LM2)	BUSH GOTTLIEB - LAW CORP	PAYER	OTHER RECEIPTS	LAW FIRM	\$41,400.00	
2018 (LM2)	TEAMSTERS LU NO 769	PAYER	OTHER RECEIPTS	AFFILIATE	\$23,603.00	\$16,533.00
2005 (LM2)	Int'l Longshoremen's Associat	PAYER	OTHER RECEIPTS	Intl Union	\$40,000.00	\$0.00
2012 (LM2)	TEAMSTERS LU NO 480	PAYER	OTHER RECEIPTS	Affiliate	\$40,000.00	\$0.00
2012 (LM2)	TEAMSTERS LU NO 97	PAYER	OTHER RECEIPTS	Affiliate	\$40,000.00	\$0.00

2008-2022 IBT Local 986 Charity Expenses



PRESS RELEASE

Former Airline Representatives Admit Roles in Bribery Conspiracy

Thursday, November 30, 2023

Share

For Immediate Release

U.S. Attorney's Office, District of New Jersey

TRENTON, N.J. – A former airline corporate real estate director and former airline senior manager, as well as a former airline contractor, each admitted accepting bribes from a company in exchange for agreeing to assist the company obtain contracts from the airline, U.S. Attorney Philip R. Sellinger announced today.

Alok Saksena, 45, of Montclair, New Jersey, Anthony Rosalli, 44, of Burlington, New Jersey, and Lovella Rogan, 48, of Springfield, New Jersey each pleaded guilty before U.S. District Judge Zahid N. Quraishi in Trenton federal court to informations that charged them with conspiracy to commit honest services wire fraud.

“The defendants compromised their positions by accepting bribes in the form of hundreds of thousands of dollars’ worth of home renovations, electronics, and jewelry. Commercial bribery of this kind corrupts the fairness of our economic system. We will hold to account those who unlawfully violate their duties to further their own economic interests.”

U.S. Attorney Philip R. Sellinger

“Federal law requires an honest bidding process because if everyone in a position of authority demanded goods and services for their approval, the cost of doing business would be astronomical and untenable,” FBI – Newark Special Agent in Charge James E. Dennehy said.

“These individuals admit to taking bribes in the form of home renovations, electronics and jewelry instead of money, thinking no one would notice. Greasing someone's palm for a lucrative contract not only isn't fair, but it's also illegal.”

“The Port Authority thanks our federal partners for the collaborative work to ensure fairness within the myriad industries that operate out of our facilities and to bring these individuals to justice,” Port Authority Inspector General John Gay said.

According to documents filed in this case and statements made in court:

Rosalli, Saksena, and Rogan all held positions with the airline that enabled them to influence which companies the airline would award certain contracts to at Newark Liberty International Airport (Newark Airport). The defendants conspired to receive bribes and kickbacks from a company that provided maintenance and construction services in exchange for helping that company obtain lucrative airline contracts at Newark Airport.

In September 2021, the maintenance and construction company bid on a contract to renovate restrooms at Newark Airport. The defendants sat on the selection committee and each of them voted to award the contract to the company. In exchange for the defendants' help in obtaining the restroom renovation contract and with the expectation that they would use their positions to help the company obtain future contracts, the company agreed to pay for significant renovations at the defendants' personal residences, including renovating and building bathrooms, renovating a deck, installing floors and sheetrock, and renovating a kitchen. The company gave the defendants valuable items, including electronics and jewelry. The total value of the bribes paid was approximately \$539,000 to Saksena; approximately \$276,000 to Rosalli; and approximately \$409,000 to Rogan.

The defendants also conspired with an employee of the maintenance and construction company to fraudulently inflate change orders, which amended the contract's scope of work, to recoup some of the bribe costs. With the defendants' knowledge and consent, the company submitted change orders, which contained fraudulently high numbers, to obtain money not legitimately earned by the company so that the company could partially fund the bribe payments to the defendants.

The defendants face a maximum sentence of 20 years in prison and a fine of up to \$250,000. Sentencing for Saksena is scheduled for April 17, 2024. Sentencing for Rosalli and Rogan is scheduled for April 18, 2024.

U.S. Attorney Sellinger credited special agents of the FBI, under the direction of Special Agent in Charge Dennehy in Newark, investigators from the Port Authority of New York & New Jersey Office of Inspector General, under the direction of Inspector General Gay, and special agents of the U.S. Attorney's Office, under the direction of Special Agent in Charge Thomas Mahoney, with the investigation leading to the guilty pleas.

[saksena.information.pdf](#)

[rosalli.information.pdf](#)

[rogan.information.pdf](#)

Updated November 30, 2023

Topic

FINANCIAL FRAUD

Component

[USAO - New Jersey](#)

Press Release Number: 23-351

Related Content

PRESS RELEASE

Passaic County Man Charged with Embezzling \$2.9 Million from Elderly Couple

FinCEN Announces \$390,000,000 Enforcement Action Against Capital One, National Association for Violations of the Bank Secrecy Act

Contact: Office of Strategic Communications, 703-905-3770

Immediate Release: January 15, 2021

WASHINGTON—The Financial Crimes Enforcement Network (FinCEN) today announced that Capital One, National Association (Capital One) has been assessed a \$390,000,000 civil money penalty (/sites/default/files/shared/Assessment_CONA%20508.pdf) for engaging in both willful and negligent violations of the Bank Secrecy Act (BSA) and its implementing regulations.

Specifically, FinCEN determined and Capital One admitted to willfully failing to implement and maintain an effective Anti-Money Laundering (AML) program to guard against money laundering. Capital One also admitted that it willfully failed to file thousands of suspicious activity reports (SARs), and negligently failed to file thousands of Currency Transaction Reports (CTRs), with respect to a particular business unit known as the Check Cashing Group. The violations occurred from at least 2008 through 2014, and caused millions of dollars in suspicious transactions to go unreported in a timely and accurate manner, including proceeds connected to organized crime, tax evasion, fraud, and other financial crimes laundered through the bank into the U.S. financial system. As stated in the Assessment of Civil Money Penalty, Capital One admitted to the facts set forth by FinCEN and acknowledged that its conduct violated the BSA and regulations codified at 31 C.F.R. Chapter X.

“The failures outlined in this enforcement action are egregious,” said FinCEN’s Director Kenneth A. Blanco. “Capital One willfully disregarded its obligations under the law in a high-risk business unit. Information received from financial institutions through the Bank Secrecy Act plays a critical role in protecting our national security, and depriving law enforcement of this information puts our nation and our people at risk. Capital One’s failures did just that. **Capital One’s egregious failures allowed known criminals to use and abuse our nation’s financial system unchecked, fostering criminal activity and allowing it to continue and flourish at the expense of victims and other citizens. These kinds of failures by financial institutions, regardless of their size and believed influence, will not be tolerated.** Today’s action should serve as a reminder to other financial institutions that FinCEN is committed to protecting our national security and the American people from harm and we will bring appropriate enforcement actions where we identify violations.”

As outlined in the Assessment, in 2008, after Capital One acquired several other regional banks, Capital One established the Check Cashing Group as a business unit within its commercial bank. The group was comprised of between approximately 90 and 150 check cashers in the New York- and New Jersey-area. Capital One provided banking services to the Check Cashing Group, including providing armored car cash shipments and processing checks deposited by Check Cashing Group customers. During the course of establishing the Check Cashing Group and banking these customers, Capital One was aware of several compliance and money laundering risks associated with banking this particular group, including warnings by regulators, criminal charges against some of the customers, and internal assessments that ranked most of the customers in the top 100 of the bank’s highest risk customers for money laundering.

Despite the warnings and internal assessments, Capital One willfully failed to implement and maintain an effective AML program in many ways. Capital One’s process for investigating suspicious transactions was weak and resulted in the failure to fully investigate and report suspicious activity to FinCEN. Capital One often failed to detect and report suspicious activity by the check cashers themselves, even as it detected and reported activity by the check casher’s customers. And Capital One’s implementation of a specialized report to provide insight into larger checks cashed by the Check Cashing Group customers’ customers (the check cashers’ patrons) failed to properly connect and report suspicious banking activity by certain check cashers.

Capital One also acknowledged failing to file SARs even when it had actual knowledge of criminal charges against specific customers, including Domenick Pucillo, a convicted associate of the Genovese organized crime family. Pucillo was one of the largest check cashers in the New York-New Jersey area, and one of the highest-risk Check Cashing Group customers. Capital One was made aware of Pucillo’s participation in potential criminal activity and other risks on several occasions, including learning in early 2013 about potential criminal charges in two different jurisdictions. Despite this information, Capital One failed to timely file SARs on suspicious activity by Pucillo’s check cashing businesses, and continued to process over 20,000 transactions valued at approximately \$160 million, including cash withdrawals, for Pucillo’s businesses. According to public sources, in May 2019 Pucillo pleaded guilty to conspiring to commit money laundering in connection with loan sharking and illegal gambling proceeds that flowed through his Capital One accounts.

Capital One also admitted to negligently failing to file CTRs on approximately 50,000 reportable cash transactions representing over \$16 billion in cash handled by its Check Cashing Group customers. Specifically, Capital One utilized an internal system that assigned a “cash” code for customer withdrawals to trigger CTR filings. In designing its system, Capital One failed to assign this “cash” code to armored car cash shipments for a number of Check Cashing Group customers. Accordingly, these transactions were not identified as customer cash withdrawals and were not reported to FinCEN through Capital One’s CTR reporting systems.

Doc #5 2021-1-15 FinCEN Announces \$390,000,000 Enforcement Action Against Capital One

In determining the final amount of the civil money penalty, FinCEN considered Capital One's significant remediation and cooperation with FinCEN's investigation. In addition to exiting the Check Cashing Group and taking specific remedial efforts related to its SAR and CTR filing systems, Capital One has made significant investments in and improvements to its AML program over the past several years. The bank also provided FinCEN with voluminous and well-organized documents, made several presentations of its findings, and signed several agreements tolling the statute of limitations during this investigation. FinCEN strongly encourages financial institutions and other businesses and individuals subject to the BSA to self-disclose any violations of FinCEN's regulations and cooperate with its enforcement investigations.

The mission of the Financial Crimes Enforcement Network is to safeguard the financial system from illicit use, combat money laundering and its related crimes including terrorism, and promote national security through the strategic use of financial authorities and the collection, analysis, and dissemination of financial intelligence.

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2021 IBT INTL HQ LM2 REPORT

Doc #6 2021 LM2 IBT NATL HQ United COVID Accomodations legal \$100,000.00

Name and Address (A)	Purpose (C)	Date (D)	Amount (E)
TAYLOR MI 48180	POLYCOTTON MASKS	02/09/2021	\$10,993
Type or Classification (B)	USA MADE TEE BLACK - 72 3XL	11/23/2021	\$19,551
Screen Printer Embroiderer	Total Itemized Transactions with this Payee/Payer		\$30,544
	Total Non-Itemized Transactions with this Payee/Payer		
	Total of All Transactions with this Payee/Payer for This Schedule		\$30,544
Name and Address (A)	Purpose (C)	Date (D)	Amount (E)
GUERRIERI, BARTOS & ROMA, P.C. 1900 M ST, NW, SUITE 700 WASHINGTON DC 20036	NOV 20 FML/EIS ARBITRATION EXP	01/11/2021	\$30,630
	FEB-21 FML/EIS ARBITRATION EXP	03/29/2021	\$16,916
	MAR-21 FML/EIA ARBITRATION	04/26/2021	\$14,722
	APR-21 HEAVY CHECK ARBITRATION	06/01/2021	\$56,804
	JUN-21 HEAVY CHECK ARBITRATION	07/26/2021	\$9,646
	AUG-21 HEAVY CHECK ARBITRATION	10/04/2021	\$27,785
Type or Classification (B)	SEP-21 UNITED COVID ACCOMDTNS	11/04/2021	\$74,480
Law Firm	OCT-21 UNITED COVID ACCOMDTNS	12/06/2021	\$27,126
	Total Itemized Transactions with this Payee/Payer		\$258,109
	Total Non-Itemized Transactions with this Payee/Payer		\$5,902
	Total of All Transactions with this Payee/Payer for This Schedule		\$264,011
Name and Address (A)	Purpose (C)	Date (D)	Amount (E)
HAMPTON INN BURR RIDGE BURR RIDGE IL 60527	Total Itemized Transactions with this Payee/Payer		\$0
Type or Classification (B)	Total Non-Itemized Transactions with this Payee/Payer		\$55,276
Hotel	Total of All Transactions with this Payee/Payer for This Schedule		\$55,276
Name and Address (A)	Purpose (C)	Date (D)	Amount (E)
HAMPTON INN LONG BEACH LONG BEACH CA 90808	Total Itemized Transactions with this Payee/Payer		\$0
Type or Classification (B)	Total Non-Itemized Transactions with this Payee/Payer		\$16,656
Hotel	Total of All Transactions with this Payee/Payer for This Schedule		\$16,656
Name and Address (A)	Purpose (C)	Date (D)	Amount (E)
HAMPTON INN PETALUMA PETALUMA CA 94952	Total Itemized Transactions with this Payee/Payer		\$0
Type or Classification (B)	Total Non-Itemized Transactions with this Payee/Payer		\$35,895
Hotel	Total of All Transactions with this Payee/Payer for This Schedule		\$35,895
Name and Address (A)	Purpose (C)	Date (D)	Amount (E)
HAMPTON INNS	Total Itemized Transactions with this Payee/Payer		\$0
	Total Non-Itemized Transactions with this Payee/Payer		\$6,725

Exhibit# 32 United Airlines \$1.5 million dollar CBA payment

12/7/2019

000-093 (LM2) 12/31/2017

NJ 07083				
Type or Classification (B)				
AFFILIATE				
Name and Address (A)				
TEAMSTERS NATIONAL PIPELINE TRAINING FUND SUITE 700 10440 LITTLE PATUXENT PRK COLUMBIA MD 21044		Purpose (C)	Date (D)	Amount (E)
Type or Classification (B)		Total Itemized Transactions with this Payee/Payer		
AFFILITATE		Total Non-Itemized Transactions with this Payee/Payer \$11,992		
		Total of All Transactions with this Payee/Payer for This Schedule \$11,992		
Name and Address (A)				
THE HARTFORD INSURANCE GROUP 277 PARK AVENUE NEW YORK NY 10172		Purpose (C)	Date (D)	Amount (E)
Type or Classification (B)		WORK COMP REBATE 2014, 2015 05/17/2017 \$33,152		
INSURANCE COMPANY		Total Itemized Transactions with this Payee/Payer \$33,152		
		Total Non-Itemized Transactions with this Payee/Payer		
		Total of All Transactions with this Payee/Payer for This Schedule \$33,152		
Name and Address (A)				
THE SEGAL COMPANY INC (MIDWEST) SUITE 400 1920 N ST NW WASHINGTON DC 20036		Purpose (C)	Date (D)	Amount (E)
Type or Classification (B)		DISASTER RELIEF CONTRIBUTION 10/04/2017 \$5,000		
ACTUARY		Total Itemized Transactions with this Payee/Payer \$5,000		
		Total Non-Itemized Transactions with this Payee/Payer		
		Total of All Transactions with this Payee/Payer for This Schedule \$5,000		
Name and Address (A)				
TMSTER-NATL 401(K) SAVING PLN 1200 THREE GATEWAY CENTER PITTSBURG PA 15222		Purpose (C)	Date (D)	Amount (E)
Type or Classification (B)		2015 ADMINISTRATIVE COST ALLOCATION 01/26/2017 \$19,531		
PENSION FUND		2016 ADMINISTRATIVE COST ALLOCATION 11/08/2017 \$17,156		
		Total Itemized Transactions with this Payee/Payer \$36,687		
		Total Non-Itemized Transactions with this Payee/Payer		
		Total of All Transactions with this Payee/Payer for This Schedule \$36,687		
Name and Address (A)				
UNITED AIRLINES INC PO BOX 4607 HOUSTON TX 77210-4607		Purpose (C)	Date (D)	Amount (E)
Type or Classification (B)		UNITED AIRLINES CBA PAYMENT 06/06/2017 \$1,500,000		
		Total Itemized Transactions with this Payee/Payer \$1,500,000		
		Total Non-Itemized Transactions with this Payee/Payer		
		Total of All Transactions with this Payee/Payer for This Schedule \$1,500,000		