

The  
SAR  
Activity  
Review

By the  
Numbers

*Issue 5*

February 2006

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# The SAR Activity Review – By the Numbers

Issue 5 (February 2006)

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# Introduction

Welcome to the fifth issue of *The SAR Activity Review – By the Numbers*, a compilation of statistical data gathered from Suspicious Activity Report forms submitted by depository institutions since April 1996, casinos and card clubs since August 1996, certain money services businesses since January 2002, and certain segments of the securities and futures industries since January 2003. *By the Numbers* serves as a companion piece to the publication of *The SAR Activity Review - Trends, Tips & Issues*, which provides information about the preparation, use, and utility of Suspicious Activity Reports.

*By the Numbers* is produced twice a year to cover two filing periods: January 1 to June 30 and July 1 to December 31. The statistical data from the filing periods is available for publication on the FinCEN website after the end of each period, usually in the spring and fall. The last issue of *By the Numbers* was published in May 2005 and may be accessed through the following link: <http://www.fincen.gov/sarreviewmay2005.pdf>.

A review of the statistical data generated for Issue 5 of *By the Numbers* reveals some interesting facts. As of June 30, 2005, over 2.6 million Suspicious Activity Report forms had been filed with FinCEN.<sup>1</sup> Although the remainder of this publication provides detailed statistical data on those filings, some general observations are provided below for each type of form.

Number of Suspicious Activity Report Filings by Year										
Form	1996	1997	1998	1999	2000	2001	2002 <sup>2</sup>	2003	2004	2005
Depository Institution	62,388 <sup>2</sup>	81,197	96,521	120,505	162,720	203,538	273,823	288,343	381,671	251,092
Money Services Business	-	-	-	-	-	-	5,723	209,512	296,284	177,943
Casinos and Card Clubs	85	45	557	436	464	1,377	1,827	5,095	5,754	2,827
Securities & Futures Industries	-	-	-	-	-	-	-	4,267	5,705	3,305
<b>Subtotal</b>	62,473	81,242	97,078	120,941	163,184	204,915	281,373	507,217	689,414	435,167
<b>Total</b>	<b>2,643,004</b>									

<sup>1</sup> The combined number of filings from the four types of Suspicious Activity Report forms: Depository Institution Suspicious Activity Report (TD F 90-22.47); Suspicious Activity Report by Money Services Business (SAR-MSB/TD F 90-22.56); Suspicious Activity Report by Casinos and Card Clubs (SAR-C / FinCEN Form 102); and Suspicious Activity Report by Securities and Futures Industries (SAR-SF/FinCEN Form 101).

<sup>2</sup> The 1996 filings now include Criminal Referral Forms filed in that year that were subsequently converted to Suspicious Activity Reports by the Detroit Computing Center.

**Depository Institution Suspicious Activity Report/TD F 90-22.47**  
(from the mandated reporting date in April 1996 through June 30, 2005)

- Between April 1996 and June 30, 2005, 1,921,798 Suspicious Activity Reports were filed by depository institutions.
- The volume of Suspicious Activity Report filings in the first six months of 2005 increased 45% over those filed in the same period in 2004.
- BSA/Structuring/Money Laundering continued to be the leading characterization of suspicious activity filed by depository institutions.
- Since April 1996, 61,278 Suspicious Activity Reports have been filed with Mortgage Loan Fraud as a suspicious activity characterization. Of these reports, 48% were filed in 2004 and 2005. In the first six months of 2005, Mortgage Loan Fraud increased 33% from the corresponding six-month reporting period in 2004.
- In the first six months of 2005, Bribery/Gratuity increased 148% from the corresponding six-month period in 2004.
- The suspicious activity characterization Counterfeit Instrument (Other) increased 130% from the corresponding six-month period.

**Suspicious Activity Report by Money Services Business/TD F 90-22.56**  
(from the mandated reporting date for using this form in October 2002 through June 30, 2005)

- A total of 689,462 Suspicious Activity Reports filed by money services businesses were received between October 1, 2002 and June 30, 2005.
- The volume of Suspicious Activity Report filings in the first six months of 2005 increased 25% over those filed during the same period in 2004.
- In the first six months of 2005, money transmitters filed 122,218 or 51% of all Suspicious Activity Reports, followed by issuers of money orders at 38,834 or 16%, and sellers of money orders at 23,852 or 10%.
- Filers reported money transfers as the most frequent type of financial service involved in the suspicious activity.
- In the first six months of 2005, the characterization of suspicious activity, “alters transaction to avoid filing a CTR form (\$10,000 or more)” increased 132% over the same period in 2004.
- In the first six months of 2005, the characterization of suspicious activity, “offers a bribe in the form of a tip/gratuity” increased 144% over the same period in 2004.

**Suspicious Activity Report by Casinos and Card Clubs/FinCEN Form 102 and, previously, TD F 90-22.49** (from the mandated reporting date in October 1997 through June 30, 2005)<sup>3</sup>

- A total of 18,467 Suspicious Activity Reports were received from casinos and card clubs.
- The volume of Suspicious Activity Report filings in the first six months of 2005 increased 2% over those filed during the same period in 2004.
- Structuring (34.61%) was the most reported characterization of suspicious activity.
- State licensed casinos submitted 76% of the total Suspicious Activity Reports filed by Casinos and Card Clubs.

**Suspicious Activity Report by Securities and Futures Industries/FinCEN Form 101** (from the mandated reporting date of January 1, 2003 through June 30, 2005)

- A total of 13,277 Suspicious Activity Reports were received from the securities and futures industries.
- The volume of Suspicious Activity Report filings in the first six months of 2005 increased 27% over those filed during the same period in 2004.
- Between January 2003 and June 2005, the most prevalent characterization of suspicious activity was Other, with 4,648 filings or 22.99%, followed by Money Laundering/Structuring at 16.43%.
- In the first six months of 2005, 1,552 filings or 58%, reported cash or its equivalent as the type of instrument used in the suspicious activity.<sup>4</sup>
- In the first six months of 2005, 1,580 filings or 29%, indicated clearing brokers as the primary type of reporting institution, followed by introducing brokers with 1,279 filings or 23%.

The statistical data in this publication is presented in an Excel format to allow readers to download and manipulate the information to achieve maximum management and compliance needs for their institution or agency.

As always, we welcome your suggestions and comments. Questions regarding present, past, or future issues of *The SAR Activity Review – By the Numbers* may be directed to FinCEN’s Regulatory Policy and Programs Division, Office of Regulatory Support at (703) 905-3968 or by contacting [webmaster@fincen.gov](mailto:webmaster@fincen.gov).

<sup>3</sup> Also includes 85 forms filed in August 1996.

<sup>4</sup> Note: Item 23 on the FinCEN Form 101 does not provide a category for Checks; therefore, some filers may report transactions in which checks were used by marking box “b” for Cash or equivalent.