

The  
SAR  
Activity  
Review

By the  
Numbers

*Issue 6*

May 2006

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# The SAR Activity Review – By the Numbers

Issue 6 (May 2006)

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# Introduction

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

*By the Numbers* generally is published twice a year to cover two filing periods: January 1 to June 30 and July 1 to December 31. The numerical 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 February 2006 to cover Suspicious Activity Reports filed through June 30, 2005, and may be accessed through the following link: [http://www.fincen.gov/sars/sars\\_by\\_num\\_issue5.pdf](http://www.fincen.gov/sars/sars_by_num_issue5.pdf).

A review of the numerical data generated for Issue 6 of *By the Numbers* reveals some interesting facts. As of December 31, 2005, over 3.1 million Suspicious Activity Report forms had been filed with FinCEN.<sup>1</sup> Although the remainder of this publication provides detailed numerical data on those filings, some general observations follow for each type of form.

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<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 the Securities and Futures Industries (SAR-SF/FinCEN Form 101).

<b>Number of Suspicious Activity Report Filings by Year</b>										
<b>Form</b>	<b>1996</b>	<b>1997</b>	<b>1998</b>	<b>1999</b>	<b>2000</b>	<b>2001</b>	<b>2002</b>	<b>2003</b>	<b>2004</b>	<b>2005</b>
Depository Institution	62,388 <sup>2</sup>	81,197	96,521	120,505	162,720	203,538	273,823	288,343	381,671	522,655
Money Services Business	-	-	-	-	-	-	5,723	209,512	296,284	383,567
Casinos and Card Clubs	85	45	557	436	464	1,377	1,827	5,095	5,754	6,072
Securities & Futures Industries	-	-	-	-	-	-	-	4,267	5,705	6,936
<b>Subtotal</b>	<b>62,473</b>	<b>81,242</b>	<b>97,078</b>	<b>120,941</b>	<b>163,184</b>	<b>204,915</b>	<b>281,373</b>	<b>507,217</b>	<b>689,414</b>	<b>919,230</b>
<b>Total</b>	<b>3,127,067</b>									

**Depository Institution Suspicious Activity Report / TD F 90-22.47**  
(from the mandated reporting date in April 1996 through December 31, 2005)

- Between April 1996 and December 31, 2005, depository institutions filed 2,193,361 Suspicious Activity Reports.
- The volume of Suspicious Activity Report filings in 2005 increased 37% over those filed in 2004.
- BSA/Structuring/Money Laundering continues as the leading characterization of suspicious activity reported by depository institutions.
- Since April 1996, 75,700 Suspicious Activity Reports have been filed identifying Mortgage Loan Fraud as the suspicious activity. Of these reports, 59% were filed in 2004 and 2005. Mortgage Loan Fraud filings in 2005 increased 41% over those filed in 2004.
- Consumer Loan Fraud filings in 2005 increased 55% over those filed in 2004.
- The suspicious activity characterization False Statement increased 77% since 2004.
- The suspicious activity characterization Computer Intrusion decreased 38% since 2004.

**Suspicious Activity Report by Money Services Business / TD F 90-22.56**  
(from the mandated reporting date in October 2002 through December 31, 2005)

- Money services businesses filed 895,086 Suspicious Activity Reports between October 1, 2002 and December 31, 2005.

<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 Internal Revenue Service's Detroit Computing Center.

- The volume of Suspicious Activity Report filings in 2005 increased 29% over those filed in 2004.
- In 2005, money transmitters filed 254,895 of all Suspicious Activity Reports, followed by issuers of money orders at 77,487, and sellers of money orders at 48,493.
- Filers reported money transfers as the most frequent type of financial service involved in the suspicious activity.
- In 2005, the character of suspicious activity, “alters transaction to avoid filing a CTR form (\$10,000 or more)” increased 102% over those filed in 2004.
- In 2005, the character of suspicious activity, “Changes spelling or arrangement of name” increased 75% over those filed 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 December 31, 2005)<sup>3</sup>

- Casinos and card clubs filed 21,712 Suspicious Activity Reports between October 1997 and December 31, 2005.
- The Suspicious Activity Report filing volume in 2005 increased 5.5% over those reports filed in 2004.
- Structuring (34.37 %) was the most reported type of suspicious activity.
- State licensed casinos submitted 77% of the total Suspicious Activity Reports filed by Casinos and Card Clubs in 2005.
- In 2005, the suspicious activity type “Unusual Use of Counter Checks or Markers” increased 200% over those filed in 2004.

**Suspicious Activity Report by the Securities and Futures Industries / FinCEN Form 101** (from the mandated reporting date in January 2003 through December 31, 2005)

- Securities and futures industries filers submitted 16,908 Suspicious Activity Reports between January 1, 2003 and December 31, 2006.
- The Suspicious Activity Report filing volume in 2005 increased 22% over those reports filed in 2004.
- Between January 2003 and December 2005, the most prevalent type of suspicious activity was Other, with 5,964 filings or 22.66%, followed by Money Laundering/Structuring at 16.40%.

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3 Also includes 85 forms filed in August 1996.

- The suspicious activity type Market Manipulation increased 232% since 2004.
- In 2005, the suspicious activity type Securities Fraud increased 110% over those filed in 2004.

The numerical data in this publication is presented in an Excel format to allow readers to download and manipulate the information to support 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 *By the Numbers* may be directed to FinCEN's Regulatory Policy and Programs Division, Office of Regulatory Analysis at (703) 905-3968 or by contacting [webmaster@fincen.gov](mailto:webmaster@fincen.gov).