

Marijuana Banking Update

Date: 17 July 2017

Depository Institutions Providing Banking Services to Marijuana Related Businesses¹
 (Data ending 30 June 2017)



Short term declines in the number of depository institutions actively providing banking services to marijuana related businesses may be explained by filers exceeding the 90 day follow-on Suspicious Activity Report (SAR) filing requirement. Several filers take 180 days or more to file a continuing activity report. After 90 days, a depository institution is no longer counted as providing banking services until a new guidance-related SAR is received.

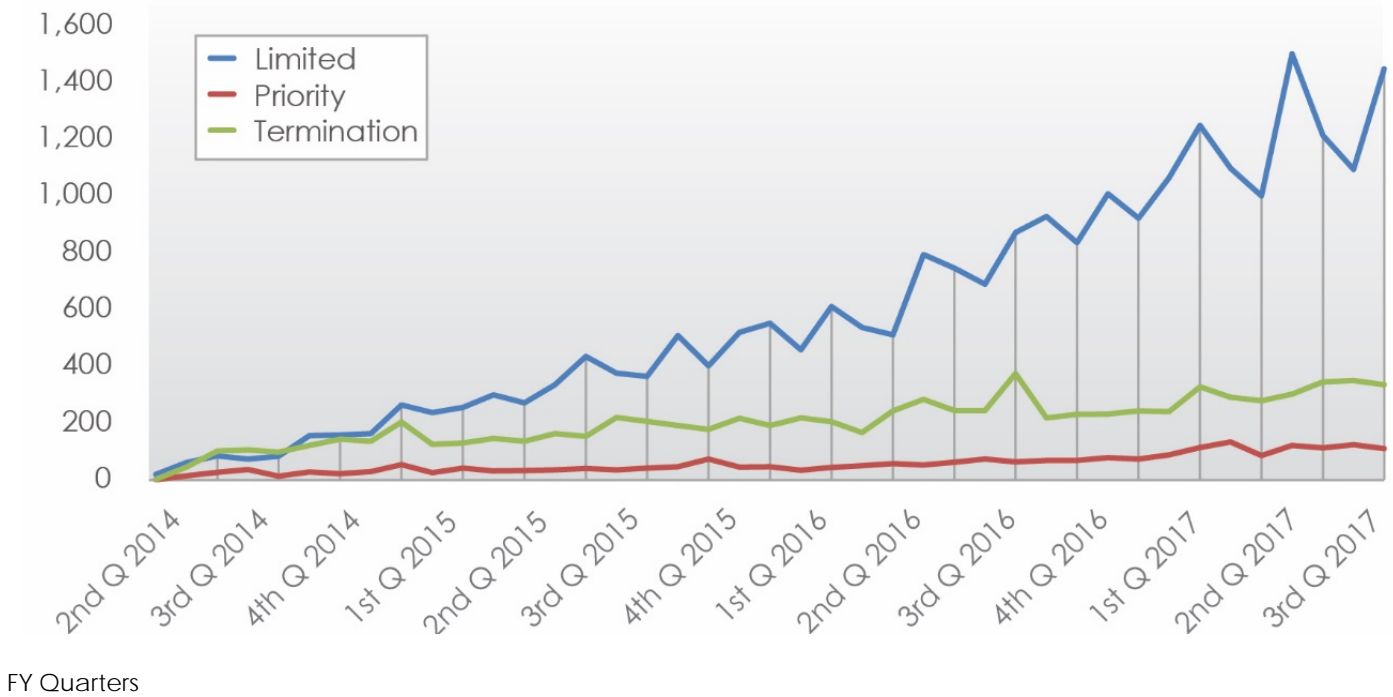
**Number of Depository Institutions Actively Banking Marijuana Businesses in the United States
(Reported in SARs)**



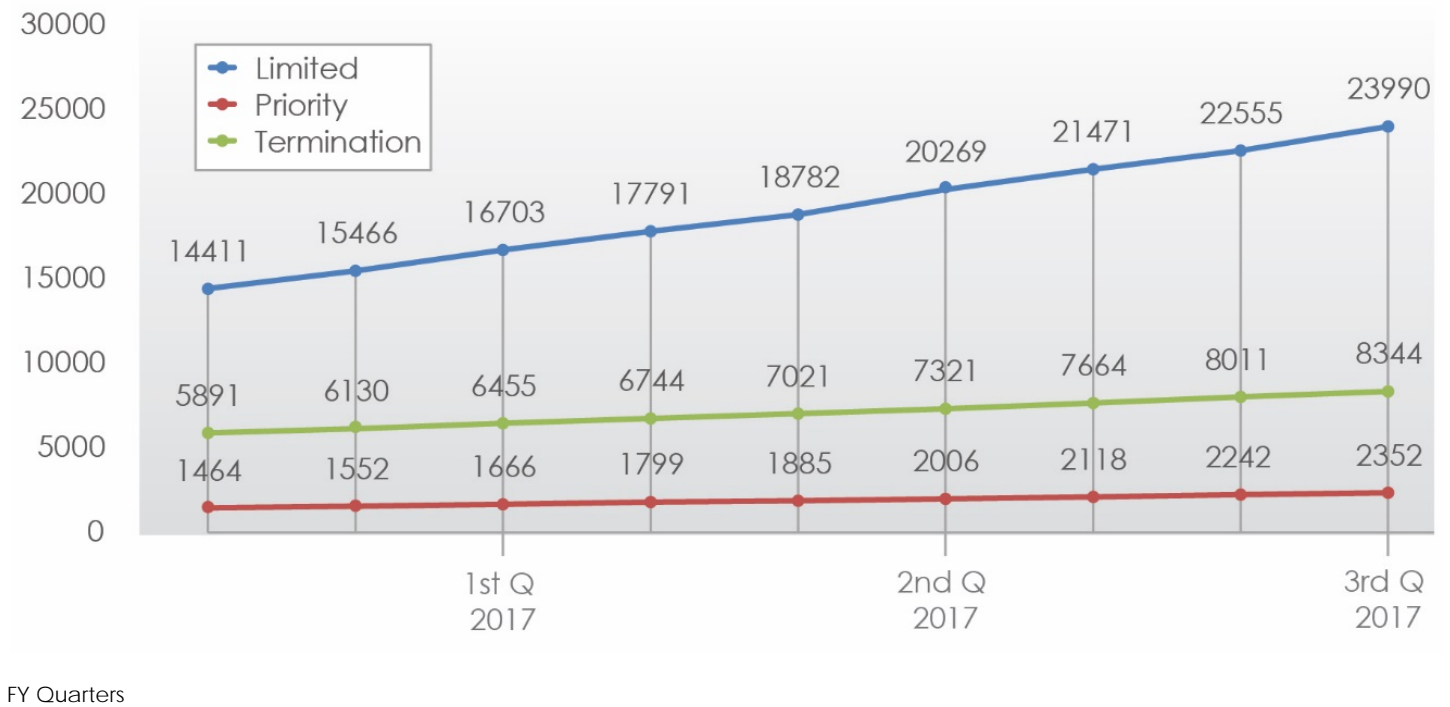
As of 30 June 2017, FinCEN received a total of 33,692 SARs using the key phrases associated with marijuana related businesses. Several of the SARs contain more than one key phrase, which accounts for the numbers for each key phrase being greater than the total.

- FinCEN received 24,101 SARs from filers in 47 states, the District of Columbia, and the Commonwealth of Puerto Rico using the key phrase "Marijuana Limited."
- FinCEN received 2,360 SARS from filers in 44 states, the District of Columbia, and the Commonwealth of Puerto Rico using the key phrase "Marijuana Priority."
- FinCEN received 8,366 SARs from filers in 50 states, the District of Columbia, and the Commonwealth of Puerto Rico using the key phrase "Marijuana Termination."

Monthly Totals for Marijuana Guidance Reports by Key Phrase



Cumulative Totals for Marijuana Guidance Reports by Key Phrase



¹ FinCEN guidance specifies three phrases for describing a financial institution's relationship to marijuana related businesses in Suspicious Activity Reports (SARs):

- The **Marijuana Limited** filing means the financial institution's due diligence indicates that the marijuana related business does not raise any of the red flags as defined in the Cole Memo and is compliant with the appropriate state's regulations regarding marijuana businesses. The financial institution is providing banking services to the marijuana related business.
- The **Marijuana Priority** filing means the financial institution's due diligence indicates that the marijuana related business may raise one or more of the red flags as defined in the Cole Memo or may not be fully compliant with the appropriate state's regulations regarding marijuana related businesses. The financial institution is providing banking services to the marijuana related business while further investigation is being conducted.
- The **Marijuana Termination** filing means the financial institution decided to terminate its relationship with the marijuana related business for one or more of the following reasons:
 - The financial institution's due diligence indicates that the marijuana related business raises one or more of the red flags as defined in the Cole Memo.
 - The marijuana related business is not fully compliant with the appropriate state's regulations.
 - The financial institution has decided not to have marijuana related customers for business reasons.