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## Introduction

Welcome to the ninth issue of *The SAR Activity Review – By the Numbers*, a compilation of numerical data gathered from Suspicious Activity Report forms filed by depository institutions since April 1996, by certain money services businesses since January 2002,<sup>2</sup> by casinos and card clubs since August 1996, by certain segments of the securities and futures industries since January 2003, and by certain segments of the insurance industry since May 2006.<sup>3</sup> *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. The last issue of *By the Numbers* was published in May 2007 to cover Suspicious Activity Reports filed through December 31, 2006, and may be accessed through the following link: [http://www.fincen.gov/sars/btn\\_8/sar\\_btn\\_issue8.pdf](http://www.fincen.gov/sars/btn_8/sar_btn_issue8.pdf).<sup>4</sup>

As of June 30, 2007, over 4.7 million Suspicious Activity Reports had been filed with FinCEN.<sup>5</sup> Since January 1, 2003, filings by non-depository institutions, individually, and as a whole, continued increasing, and are encompassing a greater portion of the Suspicious Activity Reports within the Bank Secrecy Act database. In 2001, ninety-six percent of the Suspicious Activity Report database consisted of depository institution Suspicious Activity Reports; presently the figure is sixty-four percent. From January 1, 2002 to June 30, 2007, non-depository institution Suspicious Activity Reports comprised roughly 42 percent of all Suspicious Activity Reports filed. Although the remainder of this publication provides detailed numerical data on those filings, some general observations follow for each type of form.

Number of Suspicious Activity Report Filings by Year												
Form	1996	1997	1998	1999	2000	2001	2002	2003	2004	2005	2006	2007
Depository Institution	62,388 <sup>6</sup>	81,197	96,521	120,505	162,720	203,538	273,823	288,343	381,671	522,655	567,080	324,694
Money Services Business	-	-	-	-	-	-	5,723	209,512	296,284	383,567	496,400	243,397

<sup>2</sup> Although the mandatory suspicious activity reporting requirement for certain money services businesses became effective on January 1, 2002, the Suspicious Activity Report by Money Services Business form was not available for industry use until October 1, 2002. (Money services business filers reporting suspicious activity used Form TD F 90-22.47 between January 1, 2002 and September 31, 2002. The filing data for that nine month period is included in Section 1 of this report. Some filers continued using TD F 90-22.47 after the Suspicious Activity Report by Money Services Business form became effective on October 1, 2002. That filing data also is found in Section 1.)

<sup>3</sup> Until FinCEN Form 108 is published and effective, insurance companies under mandatory suspicious activity reporting requirements use FinCEN Form 101, Suspicious Activity Report by the Securities and Futures Industries, to report any suspicious transactions. Therefore, filing data for certain segments of the insurance industry is included in Section 4.

<sup>4</sup> The online version of Issue 8 (and all future even numbered issues) contains enhancements which enable readers to link from certain exhibits (in Issue 8, Section 1, Exhibit 2) to visual representations of full year data. This enhancement is not available for editions containing half year data.

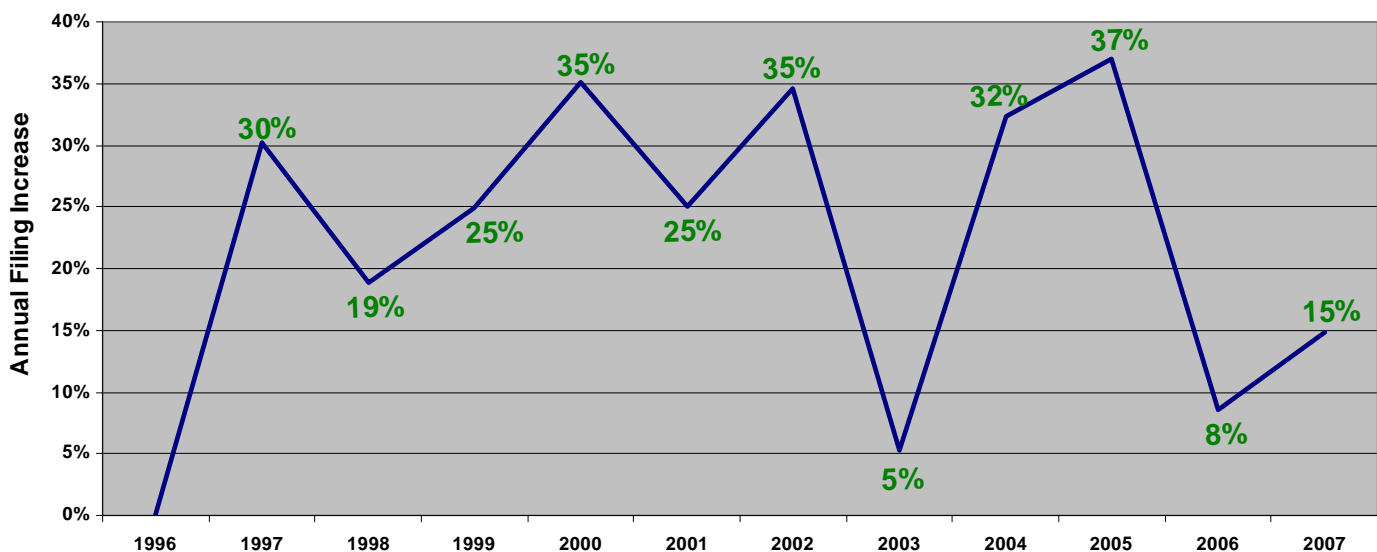
<sup>5</sup> This figure represents the combined number of filings from the four types of Suspicious Activity Report forms: depository institution Suspicious Activity Report (TD F 90-22.47); Suspicious Activity Report by Money Services Business (SAR-MSB/FinCEN Form 109); Suspicious Activity Report by Casinos and Card Clubs (SAR-C/FinCEN Form 102); and Suspicious Activity Report by the Securities and Futures Industries (SAR-SF/FinCEN Form 101).

<sup>6</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 Enterprise Computing Center-Detroit.

Casinos and Card Clubs	85	45	557	436	464	1,377	1,827	5,095	5,754	6,072	7,285	4,750
Securities & Futures Industries	-	-	-	-	-	-	-	4,267	5,705	6,936	8,129	5,984
<b>Subtotal</b>	62,473	81,242	97,078	120,941	163,184	204,915	281,373	507,217	689,414	919,230	1,078,894	578,825
<b>Total</b>	<b>4,784,786</b>											

**Depository Institution Suspicious Activity Report / TD F 90-22.47**  
(from the mandated reporting date in April 1996 through June 30, 2007)

The raw number of depository institution filings continued increasing over the last five years, although the rate of growth has been lower in the most recent years.



- Since April 1996, 116,711 Depository Institution Suspicious Activity Reports have been filed identifying Check Kiting as the characterization of suspicious activity. Of these reports, 31% were filed in 2006 and during the first half of 2007. In those first six months of 2007, Check Kiting filings increased 58% from the corresponding six-month reporting period of 2006.
- The suspicious activity characterization Mortgage Loan Fraud increased 35% from the corresponding six-month period in 2006 and was the third most prevalent type of suspicious activity reported, after Bank Secrecy Act/Structuring/Money Laundering and Check Fraud.
- Depository Institution Suspicious Activity Reports identifying Terrorist Financing as the suspicious activity decreased 25% since 2004. However, in the first six months of 2007, Terrorist Financing filings increased 19% from the corresponding six-month period in 2006.
- Identity Theft, which appeared on the Suspicious Activity Report at the same time as Terrorist Financing (July 2003), has continued to rise as a reported violation – originally debuting as number 20 and now ranked 8<sup>th</sup>.
- Data for the first six months of 2007 indicates that Suspicious Activity Reports identifying the National Credit Union Administration (NCUA) as the filing entity’s Primary Federal Regulator continue to rise, increasing 32% from those filed during the same period in 2006.

**Suspicious Activity Report by Money Services Business / FinCEN Form 109** (from October 1, 2002<sup>7</sup> through June 30, 2007)

- In 2006, money transmitters filed 19% more Suspicious Activity Reports than the previous year, totaling 304,180 or 61% of all money services business filings. Suspicious Activity Reports submitted by money transmitters in the first six months of 2007, however, decreased 12% over those filed during the same period in 2006.
- The volume of Suspicious Activity Report filings in the first six months of 2007 decreased 10% over those filed during the same period in 2006.
- In the first six months of 2007, filers continued to report money transfers as the most frequent type of financial service related to the suspicious activity. This financial service followed by money orders have been the two leading reported services since the inception of report filing by money services businesses.
- Suspicious Activity Reports filed by money services businesses characterizing the suspicious activity as “Comes in frequently and purchases less than \$3,000” increased in 2006, up 46% from the previous year. However, the first six months of 2007 revealed a decrease of 22% from those filed during the same period in 2006.
- The number of instances where the type of filer was Unspecified (left blank) significantly increased 380% from the previous twelve months.
- Other significant increases in the first six months of 2007 over those filed during the same period in 2006 included: Issuer of Traveler’s Check(s) (128%), and Seller of Traveler’s Check(s) (115%). These two categories have already surpassed the filings for all of 2006.
- The number of instances where Traveler’s Check was listed as the Financial Service Involved (in whole or in part) surpassed, in the first six months of 2007, the quantity of the same instances for all of 2006.

**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, 2007<sup>8</sup>)

- The number of Suspicious Activity Reports filed by Casinos and Card Clubs for the first six months of 2007 increased 39% over those filed during the same period in 2006.
- In the first six months of 2007, Suspicious Activity Reports filed by casinos and card clubs characterizing the suspicious activity as “Minimal Gaming with Large Transactions” increased 78% from the corresponding six-month reporting period in 2006.
- State licensed casino filings increased 32% while Tribal licensed casino filings increased 54% in the first six months of 2007, both indicative of potential significant increases for year’s end.
- Structuring continued to be the most reported type of suspicious activity, increasing 17% in the first six months of 2007 over those filed during the same period in 2006.
- The number of Casino Suspicious Activity Reports reporting “False or Conflicting ID(s)” and “Unusual Use of Counter Checks or Markers” for the first six months of 2007 is indicative of potential significant increases, by year’s end, for both summary characterizations.

**Suspicious Activity Report by the Securities and Futures Industries / FinCEN Form 101** (from the mandated reporting date in January 2003 through June 30, 2007)<sup>9</sup>

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<sup>7</sup> See footnote 2.

<sup>8</sup> Also includes 85 forms filed by casinos and card clubs in August 1996 prior to the mandatory reporting requirement.

- Suspicious Activity Reports filed by members of the securities and futures industries characterizing the suspicious activity type as Identity Theft increased 104% from the corresponding six month period in 2006.
- In 2007, Suspicious Activity Reports filed by the securities and futures industries characterizing the suspicious activity type as Market Manipulation revealed as many filings in the first six months as for all of 2006.
- Securities and futures industries Suspicious Activity Report filings during the first six months of 2007 increased 53% over the same period in 2006.
- In 2007, Suspicious Activity Reports filed by the securities and futures industries characterizing the suspicious activity type as Securities Fraud increased 171% over those filed during the same period in 2006.
- The suspicious activity type Computer Intrusion increased 47% in the first six months of 2007. The increase in the first six months of 2007 is greater than all 2006 filings.
- In 2007, Suspicious Activity Reports filed by the securities and futures industries characterizing the instrument type as Mutual Fund and Stocks reflected increases of 115% and 111%, respectively, over the same period in 2006. The total number reporting mutual funds during the first six months of 2007 was as many as reported in 2006.
- The reporting institution Futures Commission Merchant and Market Maker indicated as many filings in the first six months of 2007 as for all of 2006.

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).

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<sup>9</sup> See footnote 3 regarding Suspicious Activity Reports filed by certain segments of the insurance industry with mandatory reporting requirements effective May 2, 2006.