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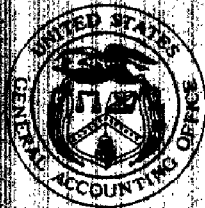
United States General Accounting Office

Fact Sheet for the Chairman, Committee
on Banking, Finance and Urban Affairs,
House of Representatives

November 1993

**MONEY
LAUNDERING**

**Characteristics of
Currency Transaction
Reports Filed in
Calendar Year 1992**





United States
General Accounting Office
Washington, D.C. 20548

General Government Division

B-255586

November 10, 1993

The Honorable Henry B. Gonzalez
Chairman, Committee on Banking,
Finance and Urban Affairs
House of Representatives

Dear Mr. Chairman:

On May 26, 1993, we testified before your Committee on Currency Transaction Reports (CTR) filed pursuant to the Bank Secrecy Act.¹ Financial institutions use the CTR to report transactions that involve more than \$10,000 in currency. After our testimony, you requested information on the characteristics of all CTRs filed during calendar year 1992. You also requested that we provide statistical data on those 100 businesses that had been the subject of the most CTRs in calendar year 1992 and that we describe the procedures that can be used to exempt certain businesses from the reporting requirements. This fact sheet responds to that request.

BACKGROUND

Federal efforts to detect and track the flow of large deposits of money and monetary instruments were significantly enhanced with the enactment of the Bank Secrecy Act in 1970. Department of the Treasury regulations implementing the act require several types of reports, including the CTR (IRS Form 4789) that is filed with the Internal Revenue Service's (IRS) Computing Center in Detroit. A financial institution² is required to file a CTR for each deposit, withdrawal, exchange of currency, or other payment or transfer, by, through, or to such institution that involves a currency transaction of more than \$10,000.

¹Money Laundering: The Use of Bank Secrecy Act Reports by Law Enforcement Could Be Increased (GAO/T-GGD-93-1, May 26, 1993).

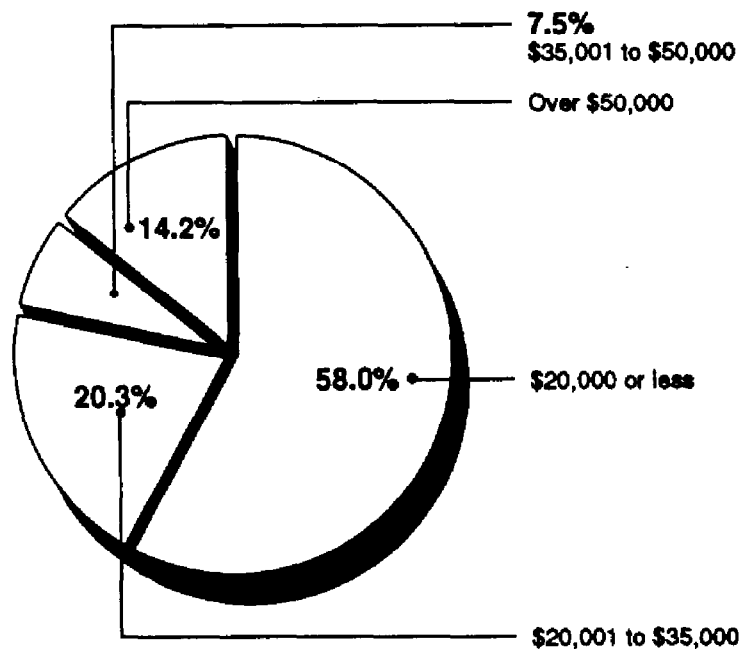
²As defined by Treasury, "financial institutions" include banks, federally regulated securities brokers, currency exchange houses, funds transmitters, check cashing businesses, and persons subject to supervision by state or federal bank supervisory authority.

As of April 1993, 49.8 million CTRs had been filed. At our testimony in May 1993 we noted that the number of CTRs filed annually has been increasing and that the total number of CTRs on file could exceed 92 million in 4 years. State and federal law enforcement agencies use the CTRs to identify, investigate, and prosecute money laundering operations and other criminal activities generating large amounts of cash.

RESULTS IN BRIEF

During calendar year 1992, there were 8.98 million CTRs filed that reported \$417.6 billion in currency transactions by businesses and individuals. (See app. II.) Banks filed 98 percent of the CTRs. As shown in figure 1, over half of the CTRs were for transactions of \$20,000 or less.

Figure 1: Distribution of 8.98 Million CTRs Filed in Calendar Year 1992, by Transaction Amount

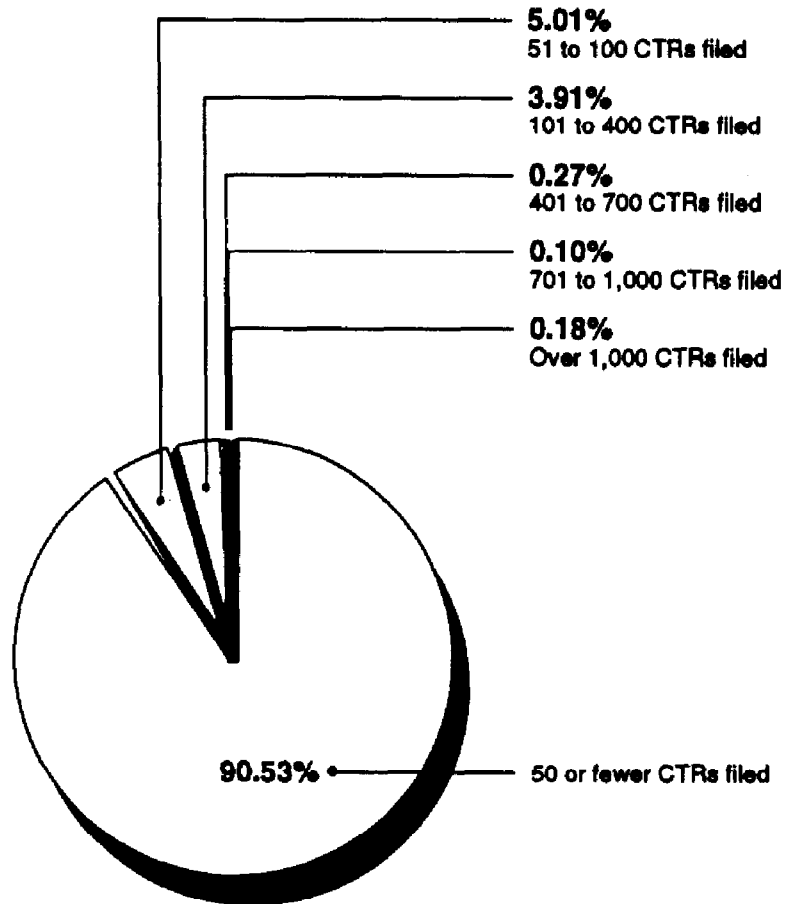


Source: IRS' Detroit Computing Center.

Businesses accounted for 8.29 million (92.3 percent) of all CTRs filed and for \$411.8 billion (98.6 percent) of the total dollar amount of transactions reported. (See app. II.) A total of

364,310 businesses were the subjects of the reports. As shown by figure 2, most of these businesses had 50 or fewer CTRs filed.

Figure 2: Distribution of 364,310 Businesses With CTRs Filed in Calendar Year 1992, by Number of CTRs Filed



Source: IRS' Detroit Computing Center.

When a CTR identifies more than one business or individual, a separate record is established in the database for each entity shown on the report. The 8.29 million CTRs filed on businesses resulted in 9.2 million records. The 100 businesses listed on the most CTRs during calendar year 1992 accounted for 1.2 million (13 percent) of the 9.2 million business records. (See app. VI.) These 100 businesses, primarily chain stores and restaurants,

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also accounted for \$89.7 billion (22 percent) of the \$411.8 billion total transaction amount reported for businesses. (See app. VII.) Most of the transactions reported for these 100 businesses (94.9 percent) were deposits.

Treasury regulations permit banks, on their own authority, to exempt certain types of businesses from CTR reporting requirements for transactions that do not exceed a specified dollar limit. Other types of businesses may also be exempted but only with Treasury's approval. Some types of businesses are ineligible for any type of exemption. (See app. I.)

Data on the number of businesses exempted are not collected. However, of the 9.2 million records that resulted from business CTRs filed in calendar year 1992, 1.2 million records (13 percent) were the result of transactions that exceeded the dollar limit placed on an exemption. Also, as we noted in our May 1993 testimony, IRS officials estimated that between 30 and 40 percent of all CTRs filed could qualify for exemptions.

SCOPE AND METHODOLOGY

In preparing this fact sheet, we reviewed pertinent documents and discussed with Treasury and IRS officials the process used to exempt the accounts of certain businesses from CTR reporting requirements. In order to describe the characteristics of CTRs filed in calendar year 1992, we used data from the computer database at the IRS Computing Center in Detroit and relied upon IRS for the necessary computer programming. IRS also provided data on the records for the 100 businesses that had been the subject of the most CTRs in calendar year 1992. Treasury officials, however, were unwilling to authorize disclosure of the identity of any of the businesses. Consequently, we relied upon IRS to determine the type of business of the entities. We did not verify or corroborate any of the data IRS provided us.

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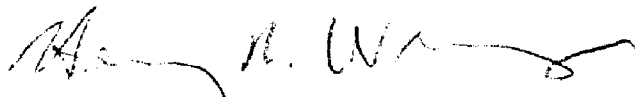
We discussed a draft of this fact sheet with officials at the IRS' Detroit Computing Center. These officials agreed with the data and information we presented.

Copies of this fact sheet are being sent to the Department of the Treasury, IRS, and other interested parties.

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Please contact me on (202) 512-5156 if you have any questions concerning this fact sheet. The major contributors to this fact sheet are listed in appendix VIII.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Henry R. Wray". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Henry R. Wray
Director, Administration
of Justice Issues

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ABBREVIATIONS

CTR	Currency Transaction Report
IRS	Internal Revenue Service

EXEMPTION PROCESS FOR CTRs

According to a Department of the Treasury publication,¹ Treasury's experience in enforcing the reporting requirements of the Bank Secrecy Act has shown that certain legitimate businesses regularly engage in currency transactions with banks that exceed \$10,000. Treasury realizes that the routine reporting of such transactions is not likely to be useful to law enforcement agencies. Therefore, Treasury regulations include provisions that permit banks² to exempt government agencies and the accounts of certain bank customers from Currency Transaction Reports (CTR). Treasury encourages banks to make full use of the exemption provisions.

The CTR exemption process is to begin with the bank determining whether a customer's account falls within the categories of business accounts and transactions that qualify for an exemption, either with or without prior approval from Treasury or the IRS. The Treasury exemption handbook lists various types of businesses for which a bank may grant either a unilateral or special exemption. A bank does not have to obtain prior approval from Treasury or IRS to grant a unilateral exemption. Unilaterally exemptible businesses include retail type businesses, sports arenas, race tracks, amusement parks, bars, restaurants, hotels, check cashing services licensed by state or local governments, vending machine companies, theaters, regularly scheduled passenger carriers, or public utilities.

A special exemption is one requiring advance Treasury or IRS approval. Examples of businesses eligible for special exemptions include service businesses such as auto repair shops, bowling alleys, car washes, dry cleaners, golf courses, and ski resorts. However, certain types of businesses are ineligible for either a unilateral or special exemption. For instance, dealerships that buy or sell motor vehicles, boats, or aircraft, although sellers of retail goods, may not be granted either a unilateral or special exemption.

Once a bank determines that a customer's account falls within the categories of unilaterally or specially exemptible businesses, it may initiate the exemption process. According to the exemption

¹Currency and Foreign Transactions Reporting Act Exemption Handbook, Department of the Treasury, Office of Financial Enforcement and Internal Revenue Service, 1988.

²The term "bank" as defined by Treasury regulations includes, among others, commercial banks, savings and loan associations and credit unions.

handbook, as a first step, the bank is to review at least 2 consecutive months of the customer's transaction activity, including currency deposits and withdrawals. The 2 months should be the most recent unless they are not indicative of the customary conduct of the customer's lawful domestic business. In addition, the bank should also review any other information that might aid in assessing the customer's transaction activity. Treasury expects banks to know their customers and to take the necessary steps to determine whether these customers are operating legitimate businesses. These steps include checking telephone directories or walking or driving past the businesses. Treasury also expects the banks to document all steps taken to determine their customers' eligibility for exemptions.

Once a customer's eligibility is established, the bank is to prepare a separate exemption statement for each account to be exempted. The statement, which is to be signed by the customer, must describe the customary conduct of the customer's lawful domestic business and contain a detailed statement explaining why the customer qualifies for an exemption. It must also specify the period covered by the transaction history that the bank reviewed, the dollar range of the transactions during that period, and any other information the bank may have about the business or its account activity. Finally, the statement must indicate whether the exemption covers deposits, withdrawals, or both, and the dollar limit of the exemption. The bank must retain the statement for the lifetime of the account's exemption status and for five years following its removal from the list.

To establish a dollar limit for exemption, Treasury recommends that banks analyze 2 consecutive months of a customer's transaction activity to determine a dollar limit commensurate with the customary conduct of the customer's business. For example, if a customer's currency transactions in a given month range from \$35,000 to \$45,000, the bank may set the exemption limit at \$45,000 if that amount recurs frequently during the month. Banks may also set seasonal and Monday only dollar limits to reflect cyclical business activity. According to the exemption handbook, amounts exceeding the customary transactions can then be detected and reported by the bank.

The Treasury exemption handbook also states that banks should continue to monitor the exemptions granted since changing circumstances may affect a customer's exemption eligibility. For instance, an appropriately exempted company may go out of business and be used as a "front" to conceal the movement of illegally obtained funds. Similarly, improvements or declines in a company's business may make the originally granted exemption limit inappropriate. In such instances, the bank is required to reassess the exemption limit to ensure it more accurately

APPENDIX I

APPENDIX I

reflects the customer's lawful domestic business activity. If a bank discovers that it has improperly exempted a customer, it is required to promptly rescind the exemption, immediately remove the customer from its exemption list, and notify Treasury's Office of Financial Enforcement of the error.

CTRs FILED IN CALENDAR YEAR 1992

	Number (millions)	Percent	Amount (billions)	Percent
Individuals				
CTRs	0.692	7.7%	\$5.7	1.4%
Records	0.715	7.2%		
Businesses				
CTRs	8.289	92.3%	\$411.8	98.6%
Records	9.249	92.8%		
Total				
CTRs	8.981	100.0%	\$417.6	100.0%
Records	9.964	100.0%		

Note: A separate record is created for each entity identified on a CTR. Consequently, there are more records than transactions.

Source: IRS' Detroit Computing Center.

CTRs FILED ON BUSINESSES IN CALENDAR
YEAR 1992, BY TYPE OF TRANSACTION

Type of transaction	Top 100 businesses		All businesses	
	Number	Percent	Number	Percent
Deposit	1,161,848	94.91%	7,792,328	84.25%
Withdrawal	32,581	2.66	704,977	7.62
Other	78,115	6.38	1,050,848	11.36
Total	1,224,217	100.00%	9,248,854	100.00%

Note: Numbers do not total because a CTR could contain both deposits, withdrawals, and other types of transactions.

Source: IRS' Detroit Computing Center.

CTRS FILED ON BUSINESSES IN CALENDAR YEAR
1992 BY AMOUNT OF TRANSACTION

Dollar amount of transaction	Top 100 businesses			All businesses		
	Number of records	Percent of total	Cumulative percent	Number of records	Percent of total	Cumulative percent
Under \$10,000	6,381	0.52%	0.52%	66,905	0.72%	0.72%
10,000-15,000	320,829	26.21	26.73	3,487,170	37.70	38.43
15,001-20,000	178,835	14.61	41.34	1,647,859	17.82	56.24
20,001-25,000	120,107	9.81	51.15	925,032	10.00	66.25
25,001-30,000	86,133	7.04	58.18	605,573	6.55	72.79
30,001-35,000	64,551	5.27	63.46	411,398	4.45	77.24
35,001-40,000	48,848	3.99	67.45	305,771	3.31	80.55
40,001-45,000	38,936	3.18	70.63	226,956	2.45	83.00
45,001-50,000	32,118	2.62	73.25	188,801	2.04	85.04
Over 50,000	327,479	26.75	100.00	1,383,389	14.96	100.00
Total	1,224,217	100.00%		9,248,854	100.00%	

Note: Treasury regulations encourage banks to file CTRs on suspicious currency transactions that may or may not exceed \$10,000. Consequently, some of the CTRs filed for transactions of less than \$10,000 may be suspicious transactions.

Source: IRS' Detroit Computing Center.

CTRs FILED ON BUSINESSES IN CALENDAR
YEAR 1992, BY TYPE OF FILING

Type of filing	Top 100 businesses		All businesses	
	Number	Percent	Number	Percent
Suspicious ^a	346	0.03%	31,879	0.34%
Exceeds exemption limit	263,537	21.53	1,200,056	12.98
Suspicious and exceeds exemption limit	(114)	(0.01)	(468)	(0.01)
Neither suspicious nor exceeds exemption limit	960,448	78.45	8,017,387	86.69
Total	1,224,217	100.00%	9,248,854	100.00%

^a The Department of the Treasury encourages institutions filing CTRs to identify any transactions that the institution considers to be of a suspicious nature.

Source: IRS' Detroit Computing Center.

ONE HUNDRED BUSINESSES WITH LARGEST VOLUME OF CTRS
FILED IN 1992, BY TRANSACTION TYPE

	Business type	Total records	Deposits	Withdrawals	Other	Suspicious	Exceeds exemption limit	Suspicious and exceeds limit	Neither suspicious nor exceeds limit
1	Retail stores	83,770	82,241	150	3,484	54	36,942	(49)	46,823
2	Convenience stores	54,646	54,417	111	1,947	12	14,331	(2)	40,305
3	Delivery services	42,432	42,188	6	2,132	9	12,254	(6)	30,175
4	Department stores	42,366	39,595	1,872	3,059	0	13,805	0	28,561
5	Department stores	37,249	31,299	1,392	6,560	2	14,494	(1)	22,754
6	Department stores	36,814	33,716	931	2,928	3	11,329	(1)	25,483
7	Restaurants	35,155	34,857	631	256	1	6,135	0	29,019
8	Retail grocery stores	32,091	26,379	6,157	2,262	0	11,256	0	20,835
9	Gas station mini mart	26,583	26,543	4	2,127	3	5,197	(1)	21,384
10	Retail shoe stores	26,038	25,991	2	380	6	1,916	(1)	24,117
11	Department stores	22,556	22,424	35	689	5	4,268	0	18,283

	Business type	Total records	Deposits	Withdrawals	Other	Suspicious	Exceeds exemption limit	Suspicious and exceeds limit	Neither suspicious nor exceeds limit
12	Building supply stores	20,177	17,790	1,145	1,273	0	4,457	0	15,720
13	Hotel chain	17,979	16,588	1,372	2,692	0	2,053	0	15,926
14	Grocery stores	17,472	11,569	2,284	4,795	5	5,179	(2)	12,290
15	Restaurants	16,533	16,512	0	618	1	1,355	0	15,177
16	Delivery services	15,490	15,393	14	419	6	5,021	(1)	10,464
17	Restaurants	15,200	15,054	131	1,094	18	900	(5)	14,287
18	Department stores	14,996	13,969	1,537	1,479	3	3,105	0	11,888
19	Drug stores	13,907	13,852	0	96	0	1,209	0	12,698
20	Shoe stores	13,328	13,319	0	225	5	803	0	12,520
21	Department stores	13,210	12,872	286	746	1	2,380	0	10,829
22	Retail food sales	12,409	12,287	88	52	0	3	0	12,406
23	Retail food sales	12,391	11,743	265	758	6	4,205	(4)	8,184
24	Video rentals	12,295	12,259	9	376	2	217	0	12,076
25	Restaurants	12,134	12,103	1	480	0	2,270	0	9,864

	Business type	Total records	Deposits	Withdrawals	Other	Suspicious	Exceeds exemption limit	Suspicious and exceeds limit	Neither suspicious nor exceeds limit
26	Restaurants	12,042	12,032	1	139	1	902	0	11,139
27	Clothing stores	12,011	11,979	11	286	3	1,511	0	10,497
28	Restaurants	11,972	11,961	1	273	3	800	0	11,169
29	Parcel pickup and delivery	11,894	11,321	10	551	17	2,834	0	9,043
30	Convenience stores	11,601	11,573	1	238	1	3,267	(1)	8,334
31	Retail clothing stores	11,527	11,513	2	213	3	961	0	10,563
32	Communications company	11,498	11,483	5	57	0	2,125	0	9,373
33	Retail toy stores	11,058	10,460	470	359	5	3,615	0	7,438
34	Drug stores	10,984	10,036	851	737	0	4,850	0	6,134
35	Retail clothing stores	10,502	10,488	2	504	0	485	0	10,017
36	Gas stations	10,335	10,321	0	24	2	1,409	0	8,924
37	Convenience stores	10,304	10,255	1	231	1	1,493	(1)	8,811

	Business type	Total records	Deposits	Withdrawals	Other	Suspicious	Exceeds exemption limit	Suspicious and exceeds limit	Neither suspicious nor exceeds limit
38	Catering services	10,081	10,002	67	425	9	846	0	9,226
39	Restaurants	9,821	9,714	91	596	0	701	0	9,120
40	Retail discount stores	9,718	9,557	114	959	1	906	0	8,811
41	Retail electronic stores	9,569	9,560	1	366	1	346	0	9,222
42	Restaurants	9,407	9,395	2	1,187	2	679	0	8,726
43	Funds transfer services	9,298	9,287	21	45	17	145	0	9,136
44	Department stores	9,107	7,894	874	593	0	3,278	0	5,829
45	Mortgage corporation	9,053	9,051	1	5	0	625	0	8,428
46	Service stations	9,003	8,992	2	145	1	1,052	0	7,950
47	Restaurants	8,791	8,785	0	70	0	902	0	7,889
48	Retail music stores	8,666	8,659	0	169	1	708	0	7,957
49	Movie theater chain	8,664	8,642	13	307	2	1,893	0	6,769

APPENDIX VI

APPENDIX VI

	Business type	Total records	Deposits	Withdrawals	Other	Suspicious	Exceeds exemption limit	Suspicious and exceeds limit	Neither suspicious nor exceeds limit
50	Travel services company	8,657	7,162	472	1,630	10	20	0	8,627
51	Restaurants	8,620	8,605	1	141	0	1,043	0	7,577
52	Supermarket	8,604	4,476	1,754	2,462	1	2,949	0	5,654
53	Small grocery markets	8,234	8,227	3	23	24	572	(9)	7,647
54	Wholesale grocery stores	7,992	7,796	357	52	0	2,837	0	5,155
55	Gas stations	7,979	7,952	6	300	5	1,341	0	6,633
56	Auto parts & supply Stores	7,892	7,849	75	27	1	956	0	6,935
57	Gasoline services stations	7,840	7,831	0	205	0	1,387	0	6,453
58	Restaurants	7,836	7,831	0	529	2	1,006	0	6,828
59	Drug stores	7,757	7,683	29	812	5	1,430	(1)	6,323
60	Retail mdse on military bases	7,693	3,652	1,131	3,206	3	2,684	(1)	5,007
61	Retail clothing stores	7,609	7,606	0	202	1	55	0	7,553

	Business type	Total records	Deposits	Withdrawals	Other	Suspicious	Exceeds exemption limit	Suspicious and exceeds limit	Neither suspicious nor exceeds limit
62	Vending machine company	7,347	7,171	151	466	4	953	0	6,390
63	Hardware sales	7,273	7,253	1	227	0	2,058	0	5,215
64	Drug stores	7,266	6,154	923	199	0	1,527	0	5,739
65	Gasoline/convenience stores	7,132	7,127	1	196	1	1,741	0	5,390
66	Grocery stores	7,112	5,285	1,461	505	0	2,455	0	4,657
67	Retail book sales	7,088	7,079	0	253	5	228	0	6,855
68	Discount warehouse sales	7,047	6,674	218	262	0	1,085	0	5,962
69	Convenience stores	7,010	6,993	0	124	0	1,397	0	5,613
70	Retail clothing for women	6,912	6,905	0	142	2	204	0	6,706
71	Restaurants	6,899	6,897	0	692	2	528	(1)	6,370
72	Grocery stores	6,894	5,481	752	2,046	7	1,332	0	5,555
73	Grocery stores	6,842	2,907	116	4,095	0	2,312	0	4,530

APPENDIX VI

APPENDIX VI

	Business type	Total records	Deposits	Withdrawals	Other	Suspicious	Exceeds exemption limit	Suspicious and exceeds limit	Neither suspicious nor exceeds limit
74	Oil company	6,428	6,423	0	764	3	978	0	5,447
75	Retail building supply stores	6,403	6,001	159	1,220	0	1,898	0	4,505
76	Retail discount stores	6,381	6,366	1	243	2	1,505	(1)	4,875
77	Grocery stores	6,061	5,056	702	652	2	2,164	0	3,895
78	Grocery stores	6,058	4,732	580	1,001	0	1,111	0	4,947
79	Retail food distribution	6,053	6,039	2	320	0	1,872	0	4,181
80	Discount drug stores	6,048	5,324	60	697	0	1,071	0	4,977
81	Convenience stores	6,020	5,990	1	12	2	2,043	0	3,975
82	Restaurants	5,836	5,832	3	114	2	577	(1)	5,258
83	Convenience stores/gasoline	5,723	5,249	332	166	5	811	0	4,907
84	Gas station	5,666	5,550	93	59	0	1,479	0	4,187
85	Wholesale distributor	5,404	5,198	291	94	0	601	0	4,803

	Business type	Total records	Deposits	Withdrawals	Other	Suspicious	Exceeds exemption limit	Suspicious and exceeds limit	Neither suspicious nor exceeds limit
86	Convenience stores	5,371	5,356	0	20	0	716	0	4,655
87	Lumber building supply stores	5,292	5,277	12	626	1	657	0	4,634
88	Gas Stations	5,255	5,252	1	779	0	343	0	4,912
89	Department stores	5,243	5,239	0	170	2	529	0	4,712
90	Restaurants	5,190	5,190	0	16	0	1,640	0	3,550
91	Grocery stores	5,165	3,766	464	1,005	0	2,264	0	2,901
92	Retail drug stores	5,162	5,110	49	25	17	1,354	(4)	3,795
93	Convenience stores	5,090	5,081	1	5	21	1,778	(21)	3,312
94	Discount stores	5,081	4,597	517	233	0	1,685	0	3,396
95	Retail auto parts and supplies	4,964	4,891	166	29	0	402	0	4,562
96	Retail clothing for women	4,963	4,956	0	157	2	205	0	4,756
97	Oil company	4,946	4,940	2	7	0	632	0	4,314

APPENDIX VI

APPENDIX VI

	Business type	Total records	Deposits	Withdrawals	Other	Suspicious	Exceeds exemption limit	Suspicious and exceeds limit	Neither suspicious nor exceeds limit
98	Pharmacy	4,921	4,910	3	1,113	0	159	0	4,762
99	Grocery stores	4,918	4,100	727	354	2	1,277	0	3,639
100	Restaurants	4,913	4,907	0	32	0	269	0	4,644
Totals		1,224,217	1,161,848	32,581	78,115	346	263,537	(114)	960,448

Source: IRS' Detroit Computing Center.

ONE HUNDRED BUSINESSES WITH LARGEST VOLUME OF CTRS FILED
IN CALENDAR YEAR 1992, BY TRANSACTION AMOUNT

	Business type	Total records	Transaction amount										Over \$50,000	Total in billions
			\$1-9,999	\$10,000-15,000	\$15,001-20,000	\$20,001-25,000	\$25,001-30,000	\$30,001-35,000	\$35,001-40,000	\$40,001-45,000	\$45,001-50,000			
1	Retail stores	83,770	808	4,222	4,978	6,068	6,156	5,376	4,704	4,016	3,267	44,175	\$8.98	
2	Convenience stores	54,646	1,688	11,367	6,355	4,064	3,101	2,488	1,973	1,698	1,371	20,541	6.37	
3	Delivery services	42,432	206	10,854	5,230	3,320	2,255	1,793	1,348	1,086	905	15,435	8.76	
4	Department stores	42,366	36	8,040	5,421	4,046	3,348	2,893	2,392	1,956	1,620	12,614	2.13	
5	Department stores	37,249	36	4,570	3,267	2,685	2,145	1,811	1,506	1,568	1,390	18,271	5.13	
6	Department stores	36,814	35	6,857	5,475	3,938	2,965	2,443	1,934	1,509	1,210	8,448	2.51	
7	Restaurants	35,155	10	8,257	7,060	5,899	3,811	2,441	1,570	1,246	1,031	3,830	1.08	
8	Retail grocery stores	32,091	11	4,995	3,376	2,671	2,207	1,594	1,475	1,130	1,014	13,618	2.94	
9	Gas station mini mart	26,583	24	7,588	5,260	3,912	2,477	1,684	1,285	869	560	2,924	0.84	
10	Retail shoe stores	26,038	95	10,026	5,171	2,793	1,783	1,367	895	671	532	2,705	0.82	
11	Department stores	22,556	21	7,225	3,831	2,463	1,739	1,311	999	729	505	3,733	0.96	
12	Building supply stores	20,177	6	1,935	1,588	1,567	1,598	1,578	1,261	924	817	8,903	1.99	
13	Hotel chains	17,979	13	5,491	3,197	2,068	1,380	1,019	648	563	434	3,166	0.71	

APPENDIX VII

APPENDIX VII

	Business type	Total records	Transaction amount										Over \$50,000	Total in billions
			\$1-9,999	\$10,000-15,000	\$15,001-20,000	\$20,001-25,000	\$25,001-30,000	\$30,001-35,000	\$35,001-40,000	\$40,001-45,000	\$45,001-50,000			
14	Grocery stores	17,472	59	3,894	1,861	1,474	1,392	1,016	874	755	620	5,527	1.70	
15	Restaurants	16,533	8	6,855	2,130	1,061	534	552	429	392	408	4,164	1.04	
16	Delivery services	15,490	8	3,603	2,226	1,641	1,024	837	635	460	363	4,693	1.38	
17	Restaurants	15,200	3	5,882	2,710	1,757	1,085	574	390	258	192	2,349	0.56	
18	Department stores	14,996	1	3,167	1,805	1,510	1,284	959	695	582	483	4,510	1.08	
19	Drug stores	13,907	240	5,350	2,150	1,326	866	719	555	365	267	2,069	0.46	
20	Shoe stores	13,328	13	5,739	2,430	1,281	839	697	450	333	239	1,307	0.49	
21	Department stores	13,210	17	3,007	1,778	1,292	1,063	899	736	632	520	3,266	0.79	
22	Retail food sales	12,409	10	1,931	2,046	1,924	1,329	779	616	406	363	3,005	0.50	
23	Retail food sales	12,391	23	2,443	1,372	1,082	997	922	675	573	503	3,801	0.98	
24	Video rentals	12,295	5	6,649	2,272	832	449	245	140	153	181	1,369	0.31	
25	Restaurants	12,134	15	5,109	2,990	1,092	643	433	264	107	111	1,370	0.43	
26	Restaurants	12,042	5	5,494	2,500	1,394	907	520	294	183	124	621	0.25	
27	Clothing stores	12,011	6	4,963	2,882	1,513	842	561	343	197	146	558	0.26	
28	Restaurants	11,972	3	4,040	1,980	1,174	870	693	415	292	300	2,205	0.49	
29	Parcel pickup and delivery	11,894	47	673	338	475	605	426	355	310	275	8,390	2.10	
30	Convenience stores	11,601	9	2,686	1,697	1,149	721	416	356	347	364	3,856	1.28	

	Business type	Total records	Transaction amount													Total in billions
			\$1-9,999	\$10,000-15,000	\$15,001-20,000	\$20,001-25,000	\$25,001-30,000	\$30,001-35,000	\$35,001-40,000	\$40,001-45,000	\$45,001-50,000	Over \$50,000				
31	Retail clothing stores	11,527	280	4,619	2,147	1,204	756	533	349	228	177	1,234	0.41			
32	Communications company	11,498	2	2,727	1,635	1,049	666	627	530	371	344	3,547	0.77			
33	Retail toy stores	11,058	5	2,017	1,445	1,029	747	569	485	409	327	4,025	0.09			
34	Drug stores	10,984	20	1,634	1,175	942	784	569	368	401	338	4,753	0.33			
35	Retail clothing stores	10,502	20	4,563	2,035	1,175	773	553	414	227	151	591	0.24			
36	Gas stations	10,335	9	4,186	1,889	1,179	877	639	307	160	115	974	0.27			
37	Convenience stores	10,304	2	3,475	2,067	1,279	664	491	342	300	227	1,457	0.32			
38	Catering services	10,081	1	3,187	1,780	1,244	820	756	459	335	222	1,277	0.30			
39	Restaurants	9,821	315	2,852	1,300	748	581	485	358	177	193	2,812	0.59			
40	Retail discount stores	9,718	2	3,757	1,840	895	531	388	256	240	184	1,625	0.34			
41	Retail electronic stores	9,569	15	4,047	1,955	1,096	671	439	244	189	134	779	0.25			
42	Restaurants	9,407	0	4,585	1,769	980	494	303	225	196	137	718	0.22			
43	Funds transfer services	9,298	53	2,692	1,399	968	641	452	363	271	219	2,240	0.62			
44	Department stores	9,107	7	1,432	958	669	508	431	360	295	249	4,198	1.05			

APPENDIX VII

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	Business type	Total records	Transaction amount												Total in billions
			\$1-9,999	\$10,000-15,000	\$15,001-20,000	\$20,001-25,000	\$25,001-30,000	\$30,001-35,000	\$35,001-40,000	\$40,001-45,000	\$45,001-50,000	Over \$50,000			
45	Mortgage corporation	9,053	2	4,040	1,937	1,093	598	390	296	199	125	373	0.19		
46	Service stations	9,003	2	2,897	1,781	924	454	312	382	283	163	1,805	0.51		
47	Restaurants	8,791	11	3,741	2,375	1,057	465	254	194	179	120	395	0.19		
48	Retail music stores	8,666	3	4,105	1,664	880	536	349	302	141	112	574	0.20		
49	Movie theater chain	8,664	4	2,473	1,393	956	779	644	458	386	275	1,296	0.28		
50	Travel services company	8,657	3	2,157	1,314	882	668	489	399	313	275	2,157	0.41		
51	Restaurants	8,620	31	3,189	2,009	1,101	613	279	211	111	138	938	0.23		
52	Supermarket	8,604	0	1,011	625	482	395	290	316	282	246	4,957	3.16		
53	Small grocery stores	8,234	9	3,176	1,705	967	608	408	196	190	145	830	0.21		
54	Wholesale grocery stores	7,992	2	200	277	351	415	301	264	381	396	5,405	1.17		
55	Gas stations	7,979	4	1,927	1,168	686	471	384	145	111	80	3,003	0.62		
56	Auto parts and supply stores	7,892	35	3,275	1,510	744	476	342	291	200	154	865	0.23		
57	Gasoline service stations	7,840	297	1,889	1,047	991	853	251	105	97	145	2,165	0.42		
58	Restaurants	7,836	1	3,135	1,291	703	479	490	268	243	332	894	0.23		
59	Drug stores	7,757	92	2,833	1,575	919	502	250	142	135	127	1,182	0.33		

	Business type	Total records	Transaction amount										Total in billions
			\$1-9,999	\$10,000-15,000	\$15,001-20,000	\$20,001-25,000	\$25,001-30,000	\$30,001-35,000	\$35,001-40,000	\$40,001-45,000	\$45,001-50,000	Over \$50,000	
60	Retail mids on military bases	7,693	22	902	665	477	493	450	390	286	367	3,641	0.70
61	Retail clothing stores	7,609	116	3,309	1,692	920	559	253	212	185	106	257	0.15
62	Vending machine company	7,347	1	2,689	1,140	710	549	451	342	246	222	997	0.24
63	Hardware stores	7,273	20	2,714	1,200	708	543	530	461	325	189	583	0.18
64	Drug stores	7,266	6	1,066	484	395	403	308	291	270	280	3,763	0.74
65	Gasoline/convenience stores	7,132	3	2,467	1,331	954	680	437	324	214	141	581	0.19
66	Grocery stores	7,112	156	1,090	682	614	432	355	288	225	242	3,028	1.05
67	Retail book sales	7,088	9	3,143	1,593	837	577	285	133	94	87	330	0.15
68	Discount warehouse stores	7,047	0	404	594	704	456	193	145	168	139	4,244	1.10
69	Convenience stores	7,010	568	1,898	1,212	702	445	300	242	177	137	1,329	0.30
70	Retail clothing for women	6,912	154	2,897	1,471	760	483	253	161	119	109	505	0.16
71	Restaurants	6,899	2	2,526	1,527	773	593	390	282	181	55	570	0.20
72	Grocery stores	6,894	0	1,434	913	636	528	409	301	181	148	2,344	1.56
73	Grocery stores	6,842	8	1,687	882	980	635	483	299	304	247	1,317	0.25
74	Oil company	6,428	2	1,487	1,306	777	755	579	251	137	67	1,067	0.30

APPENDIX VII

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	Business type	Total records	Transaction amount										Total in billions
			\$1-9,999	\$10,000-15,000	\$15,001-20,000	\$20,001-25,000	\$25,001-30,000	\$30,001-35,000	\$35,001-40,000	\$40,001-45,000	\$45,001-50,000	Over \$50,000	
75	Retail building supply stores	6,403	1	722	662	704	632	447	259	258	277	2,441	0.40
76	Retail discounts stores	6,381	49	2,582	1,334	733	378	289	220	166	89	541	0.16
77	Grocery stores	6,061	53	1,237	608	403	382	227	322	264	210	2,355	0.39
78	Grocery stores	6,058	74	403	442	501	401	322	282	260	211	3,162	1.07
79	Retail food distribution	6,053	6	1,566	1,011	789	568	473	392	290	176	782	0.28
80	Discount drug stores	6,048	5	888	940	685	618	450	333	260	186	1,683	0.27
81	Convenience stores	6,020	10	1,278	873	740	685	416	275	216	178	1,349	0.26
82	Restaurants	5,836	298	2,833	895	631	317	216	117	96	74	359	0.12
83	Convenience stores/gasoline	5,723	4	1,932	1,102	597	401	298	281	279	158	671	0.16
84	Gas station	5,666	2	1,235	673	432	287	232	191	254	244	2,116	0.38
85	Wholesale distributor	5,404	1	153	209	266	274	233	165	160	188	3,755	0.80
86	Convenience stores	5,371	0	2,423	1,068	501	263	238	245	169	112	352	0.13
87	Lumber building supply stores	5,292	1	2,095	1,128	691	392	211	179	120	91	384	0.13
88	Gas stations	5,255	1	1,950	849	391	282	386	260	190	134	812	0.17
89	Department stores	5,243	16	2,427	738	475	328	252	175	126	85	621	0.14

	Business type	Total records	Transaction amount										Over \$50,000	Total in billions
			\$1-9,999	\$10,000-15,000	\$15,001-20,000	\$20,001-25,000	\$25,001-30,000	\$30,001-35,000	\$35,001-40,000	\$40,001-45,000	\$45,001-50,000			
90	Restaurants	5,190	0	1,525	1,316	1,095	229	137	125	151	158	454	0.13	
91	Grocery stores	5,165	5	716	441	397	334	258	201	139	112	2,562	1.12	
92	Retail drug stores	5,162	0	2,378	927	481	234	189	156	163	112	522	0.15	
93	Convenience stores	5,090	15	1,492	1,060	852	633	430	280	115	114	99	0.11	
94	Discount stores	5,081	0	278	168	183	298	261	230	168	225	3,270	0.98	
95	Retail auto parts and supplies	4,964	2	1,503	927	500	405	180	127	115	100	1,105	0.23	
96	Retail clothing for women	4,963	4	2,575	987	506	312	163	120	65	41	190	0.10	
97	Oil company	4,946	48	386	445	369	230	173	125	167	113	2,890	0.67	
98	Pharmacy	4,921	3	1,879	838	545	375	315	159	114	66	627	0.16	
99	Grocery stores	4,918	9	1,517	984	626	197	148	85	88	112	1,152	0.27	
100	Restaurants	4,913	19	2,410	1,077	403	307	217	181	71	51	177	0.10	
	Totals	1,224,217	6,381	320,829	178,835	120,107	86,133	64,551	48,848	38,936	32,118	327,479	\$89.65	

Source: IRS' Detroit Computing Center.

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