

# SOI BULLETIN

A Quarterly Statistics of Income Report

## Volume 32, Number 3

The *Statistics of Income (SOI) Bulletin* is issued quarterly by the Statistics of Income Division of the Internal Revenue Service. The report provides the earliest published annual financial statistics obtained from the various types of tax and information returns filed, as well as information from periodic or special analytical studies of particular interest to students of the U.S. tax system, tax policymakers, and tax administrators. Selected historical and other data tables, previously published in every issue of the *SOI Bulletin*, now are published only on the IRS Web site ([www.irs.gov/taxstats](http://www.irs.gov/taxstats)).

Information on the availability of supplemental data on the topics included in this issue, special tabulations undertaken on a reimbursable basis, or other SOI subjects, may be obtained by telephoning the SOI's Statistical Information Services (202-874-0410), or by writing to the Director, Statistics of Income Division RAS:S, Internal Revenue Service, P.O. Box 2608, Washington, D.C. 20013-2608.

The *SOI Bulletin* is prepared under the direction of Wayne Kei, Chief, Communications and Data Dissemination Section. Paul Bastuscheck (layout and graphics), Clay Moulton (layout and graphics), Lisa Smith (layout and graphics editor), and Camille Swick (layout and graphics) are the editorial staff who prepare the manuscript. Jim Hobbs, Emily Gross, and Beth Kilss also made major contributions in the production of this issue. Views expressed in the articles are those of the authors and do not necessarily represent the views of the Treasury Department or the Internal Revenue Service.

**NOTE:** When using information from this report, cite the publication as follows—

Internal Revenue Service  
Statistics of Income Bulletin  
Winter 2013  
Washington, D.C.

For sale by the  
Superintendent of Documents  
P.O. Box 371954  
Pittsburgh, PA 15250-7954

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# Inside this Issue

## Individual Income Tax Returns, Preliminary Data, 2011

by Jessica Holland and Michael Parisi

For Tax Year 2011, taxpayers filed 145.6 million U.S. individual income tax returns, an increase of 1.9 percent from the 142.9 million returns filed for Tax Year 2010. Continuing the trend from Tax Year 2010, adjusted gross income (AGI) and several other notable items increased in 2011. AGI increased by 3.1 percent from 2010 to \$8.3 trillion for 2011. Taxable income increased 4.3 percent to \$5.7 trillion; total income tax increased by 9.8 percent to \$1.0 trillion; and total tax liability increased by 9.3 percent to \$1.1 trillion. Along with the rise in income and other taxes, the alternative minimum tax rose by 11.2 percent to \$27.0 billion for 2011.

## Individual Income Tax Rates and Shares, 2010

by Adrian Dungan and Michael Parisi

Taxpayers filed 142.9 million individual income tax returns for Tax Year 2010. Of those, 84.5 million (or 59.1 percent) were classified as taxable returns. A taxable return is a return that has total income tax greater than \$0. The 59.1 percent represents the second lowest percentage of taxable returns in more than 25 years, with 2009 having been the lowest at 58.3 percent. Adjusted gross income (AGI) on these taxable returns increased 6.9 percent to \$7.25 trillion for 2010, while total income tax increased 9.9 percent to \$952 billion. The average tax rate for taxable returns increased 0.4 percentage points to 13.1 percent.

The top 1 percent of tax returns, with an AGI of at least \$369,691, accounted for 18.9 percent of total AGI for 2010. This represents an increase in income share of 1.7 percentage points from the previous year, when the cutoff for this group was \$351,968. These taxpayers accounted for 37.4 percent of the total income tax reported, an increase from 36.3 percent in 2009. The top 5 percent of tax returns accounted for 33.8 percent of total AGI and 59.1 percent of total income tax for 2010. To be included in the top 5 percent, a tax return must have had an AGI of at least \$161,579, whereas, in 2009, the cutoff for this group was \$157,342.

## Individual Noncash Charitable Contributions, 2010

by Pearson Liddell and Janette Wilson

For Tax Year 2010, 22.5 million individual taxpayers who itemized deductions reported \$44.3 billion in deductions for noncash charitable contributions. Of these taxpayers, 7.3 million reported \$34.9 billion in deductions

for charitable contributions on Form 8283, *Noncash Charitable Contributions*. This form is used by individual taxpayers when the amount of taxpayer deductions for all noncash donations on Schedule A, *Itemized Deductions*, exceeds \$500. The number of taxpayers filing Form 8283 increased by 9.1 percent from 6.7 million for Tax Year 2009, and the amount claimed for donations increased even more (by 24.7 percent), from \$28.0 billion in 2009. For both 2009 and 2010, corporate stock donations represented the largest share of total donations, in terms of amounts claimed. For 2010, corporate stock donations of \$13.4 billion, which represented 38.3 percent of all donations claimed, increased 37.3 percent from the Tax Year 2009 amount of \$9.7 billion. In terms of donation recipients, for Tax Year 2010, large organizations received the most in donations followed by foundations, receiving \$8.9 billion and \$8.7 billion, respectively. Those taxpayers ages 65 and older donated 42.6 percent of all donations, giving \$14.9 billion. For Tax Year 2010, there were no notable tax law changes that affected the deductions allowed for noncash charitable contributions.

## Split-Interest Trusts, Filing Year 2011

by Lisa Schreiber Rosenmerkel

In 2011, some 117,710 *Split-Interest Trust Information Returns* (Form 5227) were filed for charitable remainder trusts, charitable lead trusts, and pooled income funds. In total, split-interest trust filers reported \$9.7 billion in gross income and \$118.1 billion in end-of-year assets. Corporate stock continued to account for the majority of assets held by split-interest trusts, though its value decreased slightly in 2011. Total income reported on Form 5227 increased to \$6.6 billion in 2011. Trustees of split-interest trusts reported approximately \$3.1 billion in charitable distributions and \$5.2 billion in noncharitable distributions. Split-interest trusts received more than \$3.0 billion in asset contributions throughout the year.

## Domestic Private Foundations and Related Excise Taxes, Tax Year 2009

by Cynthia Belmonte

Total assets reported by private foundations increased 10.5 percent between Tax Years 2008 and 2009, from \$532.9 billion to \$588.5 billion. Total revenue for Tax Year 2009 was \$52.2 billion, a 3.8-percent increase over the previous year. Contributions, gifts, and grants received decreased slightly, from \$44.3 billion to \$42.4 billion, but remained the largest source of revenue. Combined, income derived from assets, including net gains from sales of assets, dividends and interest from

securities, and interest on savings, totaled \$4.9 billion. Private foundations distributed \$40.9 billion in contributions, gifts, and grants to the charitable sector, a 5.6-percent decrease from the previous year.

Although exempt from traditional income taxes, private foundations were required to report and pay excise taxes under Internal Revenue Code (IRC) sections 4940 through 4945. For Tax Year 2009, private foundations reported \$230.9 million in total excise tax liability. The IRC section 4940 excise tax on net investment income, at \$221.0 million, was the largest component of excise taxes. Additional excise taxes for prohibited activities under IRC sections 4941-4945, as reported by private foundations on Form 4720, totaled \$9.9 million.

## **Controlled Foreign Corporations, 2008**

by Lee Mahony and Randy Miller

For Tax Year 2008, some 83,642 foreign corporations controlled by U.S. multinational corporations held \$14.5 trillion in assets and reported receipts of \$6.0 trillion. These controlled foreign corporations (CFCs) paid \$125.2 billion in income taxes on \$662.0 billion of earnings and profits (less deficit) before income taxes ("E&P"). Both CFC assets and receipts increased slightly more than 24 percent from Tax Year 2006, while "E&P" and foreign taxes income taxes paid increased by nearly 30 percent.

For Tax Year 2008, these same CFCs were incorporated in 188 different countries (based on unpublished data). More than 42 percent, or 35,856, of these CFCs were incorporated in Europe. Nearly 91 percent

of the European CFCs were located in European Union countries.

Almost 79 percent, or 65,740, of CFCs for Tax Year 2008 were concentrated in three major industrial sectors: (1) services; (2) goods production; and (3) distribution and transportation of goods. These three industrial sectors accounted for 81.2 percent of total receipts (\$4.9 trillion), 74.9 percent of E&P (less deficit) before income taxes (\$496.0 billion), and 57.5 percent of income taxes (\$72.0 billion).

For Tax Year 2008, controlled foreign corporations were tax owners of 17,548 foreign disregarded entities (FDEs). These foreign disregarded entities reported \$4.9 trillion in assets and \$230.1 billion in E&P (less deficit) after taxes.

## **In the Next Issue**

Articles on the following topics are tentatively planned for inclusion in the Spring 2013 issue of the *Statistics of Income Bulletin*, scheduled to be published in May 2013:

- High-income tax returns for 2010;
- Sales of capital assets, 2008 and 2009;
- Nonresident alien estate tax returns, 2011;
- Unrelated business income tax returns, 2009;
- Municipal bonds, 2010; and
- Projections of Federal tax return filings: Calendar Years 2012–2019.

# Individual Income Tax Returns, Preliminary Data, 2011

by Jessica Holland and Michael Parisi

For Tax Year 2011, taxpayers filed 145.6 million U.S. individual income tax returns, an increase of 1.9 percent from the 142.9 million returns filed for 2010. Continuing the trend from Tax Year 2010, adjusted gross income (AGI) and several other notable items increased in 2011. AGI increased by 3.1 percent from 2010 to \$8.3 trillion for 2011. Taxable income increased 4.3 percent to \$5.7 trillion; total income tax increased by 9.8 percent to \$1.0 trillion; and total tax liability increased by 9.3 percent to \$1.1 trillion. Along with the rise in income and other taxes, the alternative minimum tax rose by 11.2 percent to \$27.0 billion for 2011.

Figure A shows some of the key components that contributed to the growth in AGI between 2010 and 2011. The largest component of AGI, salaries and wages, increased 4.1 percent from \$5,920.2 billion in 2010 to \$6,161.5 billion in 2011. The second largest component of AGI, taxable pensions and annuities, increased 4.0 percent from \$567.7 billion in 2010 to \$590.4 billion in 2011. Other items related to retirement also showed increases: taxable Social Security benefits rose by 5.3 percent, and taxable individual retirement arrangement (IRA) distributions increased by 12.3 percent (see Changes in Law section). Increases in net income less losses associated with businesses were reported for Tax Year 2011 by partnerships and S corporations (up 4.7 percent) and businesses or professions (up 4.6 percent). Another key component of AGI that increased between 2010 and 2011 was ordinary dividends, which increased 9.1 percent to \$169.6 billion. On the other hand, net capital gains decreased 2.9 percent from \$320.1 billion in 2010 to \$310.9 billion in 2011. However, one component of this, capital gain distributions, rose 131.9 percent from \$5.8 billion to \$13.6 billion. Another major component of income that decreased was taxable interest, which decreased by 16.6 percent to \$98.4 billion in 2011. Also, taxable unemployment compensation was down 23.4 percent to \$92.7 billion from 2010 and the number of tax returns reporting taxable unemployment compensation decreased by 11.9 percent to 13.3 million returns.

*Jessica Holland is an economist with the Individual Special Projects Section. Michael Parisi is an economist with the Individual Returns Analysis Section. This article was prepared under the direction of Michael Strudler, Chief, Individual Returns Research Section.*

Statutory adjustments to total income increased 4.4 percent to \$120.3 billion for Tax Year 2011. The total amount claimed for exemptions increased 2.1 percent to \$1,076.1 billion. The largest statutory adjustment was the deduction for the self-employment tax, which increased 7.1 percent from \$22.5 billion to \$24.1 billion (see Changes in Law section). The self-employed health insurance deduction increased 4.4 percent to \$22.1 billion. Payments to self-employed retirement (Keogh) plans rose 2.4 percent to \$17.6 billion, while payments to IRAs decreased 3.9 percent to \$11.3 billion. The largest percent change in adjustments was the moving expenses adjustment, which rose 58.2 percent to \$4.2 billion. Other adjustments that increased from 2010 levels were the deductions for health savings accounts (5.8 percent) and interest on student loans (5.7 percent).

Total deductions, the sum of standard deductions and total itemized deductions, increased 1.5 percent from Tax Year 2010 to \$1,940.4 billion in Tax Year 2011. The number of returns claiming the standard deduction increased 3.3 percent, accounting for 66.6 percent of all returns filed and 39.9 percent of the total deductions amount. The average standard deduction (comprised of the basic and additional standard deduction) increased 0.9 percent from \$7,911 for 2010 to \$7,979 for 2011, for a total of \$774.1 billion. Itemized deductions were claimed on 31.8 percent of all returns filed for 2011 and represented 60.1 percent of the total deductions amount.<sup>1</sup> The average total for itemized deductions was \$25,230, a 0.4-percent increase from the 2010 average of \$25,119. Overall, 46.2 million taxpayers (down 0.6 percent from 2010) claimed total itemized deductions of \$1,166.3 billion, a decrease of 0.2 percent of what was reported in 2010.

The total taxes paid deduction was the largest deduction, accounting for 38.6 percent of all itemized deductions. For 2011, it increased 4.2 percent to \$450.8 billion. The second largest deduction was the interest paid deduction, comprising 31.9 percent of total itemized deductions. For 2011, it decreased 7.6 percent to \$371.6 billion. The mortgage interest deduction accounted for \$358.8 billion and 96.5 percent of the total interest paid deduction, yet it decreased 7.3 percent from 2010. This large decrease could be partially attributed to the record-low average prevailing interest rates throughout 2011, lower home ownership, and declines in home values.<sup>2</sup> Other itemized deductions included the deduction for medical and dental expenses, which decreased 0.9 percent to

<sup>1</sup> The remaining 1.6 percent of the returns did not need to claim either a standard deduction or itemized deductions because no AGI was reported.

<sup>2</sup> The average mortgage interest rate for 2011 was 4.45 percent compared with 4.69 percent for 2010. See source: Primary Mortgage Market Survey®. The U.S. national homeownership rate decreased from 66.9 percent in 2010 to 66.1 percent in 2011 according to the U.S. Census Bureau. See source: Table 15, <http://www.census.gov/housing/hvs/data/ann11ind.html>. The inflation-adjusted price of homes fell approximately 6.2 percent from 2010 to 2011 according to the Federal Housing Finance Agency. See source: <http://www.fhfa.gov/webfiles/23396/4Q2011hpi.pdf>.

# Individual Income Tax Returns, Preliminary Data, 2011

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## Figure A

### Individual Income Tax Returns, Preliminary Data: Selected Income and Tax Items, Tax Years 2010 and 2011

[All figures are estimates based on samples—money amounts are in thousands of dollars]

Item	Number of returns			Amount		
	2010	2011	Percentage change	2010	2011	Percentage change
	(1)	(2)	(3)	(4)	(5)	(6)
<b>Number of returns, total</b>	<b>142,856,282</b>	<b>145,579,530</b>	<b>1.9</b>	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>
Form 1040 returns	83,754,981	83,962,280	0.2	N/A	N/A	N/A
Form 1040A returns	41,093,748	38,974,100	-5.2	N/A	N/A	N/A
Form 1040EZ returns	18,007,553	22,643,149	25.7	N/A	N/A	N/A
Electronically-filed returns [1]	101,709,829	120,375,055	18.4	N/A	N/A	N/A
<b>Adjusted gross income (less deficit)</b>	<b>142,856,282</b>	<b>145,579,530</b>	<b>1.9</b>	<b>8,045,020,527</b>	<b>8,292,393,204</b>	<b>3.1</b>
Salaries and wages	118,240,428	120,317,238	1.8	5,920,186,109	6,161,526,961	4.1
Taxable interest	55,350,527	52,396,110	-5.3	117,869,310	98,356,849	-16.6
Tax-exempt interest [2]	6,091,192	5,955,446	-2.2	69,221,407	66,639,737	-3.7
Ordinary dividends	27,951,339	27,650,383	-1.1	155,453,034	169,550,560	9.1
Qualified dividends	25,005,581	25,052,468	0.2	115,605,831	125,191,743	8.3
State income tax refunds	22,059,302	22,405,480	1.6	25,244,094	25,620,717	1.5
Alimony received	441,462	434,418	-1.6	8,587,978	8,201,903	-4.5
Business or profession net income	16,978,538	17,317,197	2.0	307,490,422	319,286,114	3.8
Business or profession net loss	5,450,300	5,589,622	2.6	52,254,773	52,436,123	0.3
Business or profession net income less loss	22,428,838	22,906,819	2.1	255,235,649	266,849,990	4.6
Net capital gain [3]	7,200,065	10,130,951	40.7	320,126,367	310,896,415	-2.9
Capital gain distributions [3]	6,574,859	8,824,527	34.2	5,842,520	13,550,709	131.9
Net capital loss	12,758,052	11,832,163	-7.3	29,732,934	27,296,431	-8.2
Sales of property other than capital assets, net gain	746,053	823,930	10.4	10,646,805	11,580,564	8.8
Sales of property other than capital assets, net loss	1,068,430	951,920	-10.9	28,616,716	25,839,094	-9.7
Sales of property other than capital assets net gain less loss	1,814,483	1,775,850	-2.1	-17,969,911	-14,258,530	20.7
Taxable Individual Retirement Arrangement distributions	12,587,711	13,094,079	4.0	192,590,593	216,294,925	12.3
Taxable pensions and annuities	26,971,722	27,097,754	0.5	567,746,880	590,383,592	4.0
Rent and royalty net income	6,103,530	6,412,113	5.1	86,770,707	93,594,726	7.9
Rent and royalty net loss	5,610,628	5,674,163	1.1	60,131,011	58,713,835	-2.4
Rent and royalty net income less loss	11,714,158	12,086,276	3.2	26,639,696	34,880,890	30.9
Partnership and S corporation net income	4,602,111	4,687,703	1.9	450,637,636	458,870,831	1.8
Partnership and S corporation net loss	2,576,367	2,480,085	-3.7	87,015,077	78,250,171	-10.1
Partnership and S corporation net income less loss	7,178,478	7,167,788	-0.1	363,622,559	380,620,660	4.7
Estate and trust net income	544,160	514,271	-5.5	19,943,526	18,859,988	-5.4
Estate and trust net loss	38,990	44,852	15.0	1,451,225	1,120,181	-22.8
Estate and trust net income less loss	583,150	559,123	-4.1	18,492,301	17,739,807	-4.1
Farm net income	601,736	613,864	2.0	13,575,330	16,383,985	20.7
Farm net loss	1,303,456	1,266,450	-2.8	23,302,471	23,494,561	0.8
Unemployment compensation	15,093,157	13,304,580	-11.9	121,101,218	92,709,719	-23.4
Taxable Social Security benefits	16,360,942	16,890,909	3.2	192,700,608	202,974,835	5.3
<b>Total statutory adjustments</b>	<b>35,231,929</b>	<b>35,713,497</b>	<b>1.4</b>	<b>115,232,950</b>	<b>120,286,462</b>	<b>4.4</b>
Educator expenses	3,660,548	3,879,653	6.0	927,901	976,767	5.3
Certain business expenses of reservists, performing artists, and fee-basis government officials	132,271	149,474	13.0	490,260	518,382	5.7
Payments to an Individual Retirement Arrangement	2,632,705	2,616,065	-0.6	11,713,234	11,255,268	-3.9
Student loan interest deduction	10,288,629	10,183,878	-1.0	9,298,678	9,826,305	5.7
Tuition and fees deduction	2,003,930	1,957,339	-2.3	4,383,982	4,357,612	-0.6
Health savings account deduction	968,282	981,452	1.4	2,772,307	2,934,461	5.8
Moving expenses adjustment	1,005,822	1,024,723	1.9	2,636,778	4,170,682	58.2

Footnotes at end of figure.

# Individual Income Tax Returns, Preliminary Data, 2011

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## Figure A—Continued

### Individual Income Tax Returns, Preliminary Data: Selected Income and Tax Items, Tax Years 2010 and 2011—Continued

[All figures are estimates based on samples—money amounts are in thousands of dollars]

Item	Number of returns			Amount		
	2010	2011	Percentage change	2010	2011	Percentage change
	(1)	(2)	(3)	(4)	(5)	(6)
Self-employment tax deduction	17,475,401	18,077,044	3.4	22,515,749	24,112,872	7.1
Self-employed health insurance deduction	3,577,367	3,569,236	-0.2	21,180,593	22,114,796	4.4
Payments to a self-employed retirement (Keogh) plan	869,869	869,952	0.0	17,201,923	17,621,794	2.4
Penalty on early withdrawal of savings	1,206,181	1,061,787	-12.0	2,141,056	2,089,469	-2.4
Alimony paid	593,112	583,132	-1.7	10,054,212	10,339,024	2.8
Domestic production activities deduction	582,531	616,344	5.8	8,171,498	8,447,895	3.4
Other adjustments [4]	138,137	144,280	4.4	1,656,941	1,412,611	-14.7
<b>Total exemptions [5]</b>	<b>288,871,701</b>	<b>290,959,379</b>	<b>0.7</b>	<b>1,053,677,881</b>	<b>1,076,128,195</b>	<b>2.1</b>
<b>Total deductions</b>	<b>140,462,104</b>	<b>143,239,893</b>	<b>2.0</b>	<b>1,911,465,276</b>	<b>1,940,352,305</b>	<b>1.5</b>
<b>Total standard deduction</b>	<b>93,956,574</b>	<b>97,014,844</b>	<b>3.3</b>	<b>743,284,578</b>	<b>774,073,808</b>	<b>4.1</b>
Basic standard deduction	93,956,574	97,014,844	3.3	721,558,846	751,058,261	4.1
Additional standard deduction [6]	13,149,538	13,330,220	1.4	21,725,732	22,985,385	5.8
<b>Total itemized deductions</b>	<b>46,505,531</b>	<b>46,225,049</b>	<b>-0.6</b>	<b>1,168,180,698</b>	<b>1,166,278,497</b>	<b>-0.2</b>
Medical and dental expenses deduction	10,352,527	10,300,929	-0.5	82,903,037	82,154,035	-0.9
Taxes paid deduction	46,191,963	45,904,067	-0.6	432,611,536	450,763,322	4.2
State and local income taxes [7]	44,777,788	44,545,480	-0.5	253,982,187	270,951,014	6.7
Income taxes	33,661,696	33,964,669	0.9	238,019,649	255,171,898	7.2
General sales taxes	11,116,092	10,580,811	-4.8	15,962,538	15,779,117	-1.1
Interest paid deduction	37,348,715	36,458,783	-2.4	402,049,295	371,622,696	-7.6
Total home mortgage interest	36,878,908	35,971,926	-2.5	387,104,437	358,774,706	-7.3
Charitable contributions deduction	38,166,791	37,858,203	-0.8	158,187,787	160,336,603	1.4
<b>Taxable income</b>	<b>107,420,757</b>	<b>108,893,638</b>	<b>1.4</b>	<b>5,458,994,693</b>	<b>5,695,765,605</b>	<b>4.3</b>
Alternative minimum tax	4,020,556	4,292,149	6.8	24,309,578	27,021,186	11.2
<b>Income tax before credits</b>	<b>106,771,394</b>	<b>107,963,513</b>	<b>1.1</b>	<b>1,056,272,937</b>	<b>1,107,934,134</b>	<b>4.9</b>
<b>Total tax credits [8]</b>	<b>91,088,638</b>	<b>49,857,151</b>	<b>-45.3</b>	<b>111,767,702</b>	<b>70,450,947</b>	<b>-37.0</b>
Child care credit	6,434,860	6,425,683	-0.1	3,452,202	3,482,560	0.9
Credit for the elderly or disabled	92,219	115,374	25.1	14,051	16,623	18.3
Child tax credit	23,727,736	23,308,358	-1.8	28,692,548	28,295,971	-1.4
Education tax credits	12,018,996	12,233,236	1.8	12,459,021	12,572,522	0.9
Retirement savings contributions credit	6,230,031	6,504,841	4.4	1,049,749	1,140,959	8.7
Residential energy credits	7,331,493	3,722,744	-49.2	6,301,094	1,709,046	-72.9
Foreign tax credit	6,668,226	6,898,513	3.5	13,097,303	13,485,943	3.0
General business credit	406,707	428,063	5.3	1,663,038	1,842,613	10.8
Prior year minimum tax credit	240,536	239,841	-0.3	638,835	545,769	-14.6
<b>Total earned income credit (EIC)</b>	<b>27,776,521</b>	<b>28,314,220</b>	<b>1.9</b>	<b>60,931,712</b>	<b>64,411,121</b>	<b>5.7</b>
EIC used to offset income tax before credits	1,429,504	3,761,542	163.1	460,585	1,099,646	138.7
EIC used to offset other taxes	5,519,451	6,871,375	24.5	4,946,755	6,690,796	35.3
EIC refundable portion	25,662,481	25,044,745	-2.4	55,524,372	56,620,678	2.0
<b>Total American opportunity credit</b>	<b>12,122,252</b>	<b>13,016,424</b>	<b>7.4</b>	<b>10,748,301</b>	<b>11,690,654</b>	<b>8.8</b>
Refundable American opportunity credit used to offset income tax before credits	5,432,589	6,007,342	10.6	4,323,011	4,727,606	9.4
Refundable American opportunity credit used to offset other taxes	650,484	603,649	-7.2	346,260	298,149	-13.9
Refundable American opportunity credit refundable portion	7,281,054	7,743,406	6.4	6,079,030	6,664,899	9.6
<b>Total additional child tax credit</b>	<b>21,285,710</b>	<b>21,520,041</b>	<b>1.1</b>	<b>28,113,542</b>	<b>29,040,027</b>	<b>3.3</b>
Additional child tax credit used to offset other taxes	909,965	1,170,200	28.6	918,366	1,074,599	17.0
Additional child tax credit refundable portion	20,733,949	20,878,669	0.7	27,195,176	27,965,428	2.8
<b>Total first-time homebuyer credit</b>	<b>335,581</b>	<b>13,574</b>	<b>-96.0</b>	<b>2,294,470</b>	<b>98,709</b>	<b>-95.7</b>

Footnotes at end of figure.

# Individual Income Tax Returns, Preliminary Data, 2011

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## Figure A—Continued

### Individual Income Tax Returns, Preliminary Data: Selected Income and Tax Items, Tax Years 2010 and 2011—Continued

[All figures are estimates based on samples—money amounts are in thousands of dollars]

Item	Number of returns			Amount		
	2010	2011	Percentage change	2010	2011	Percentage change
(1)	(2)	(3)	(4)	(5)	(6)	
First-time homebuyer credit used to offset income tax before credits	267,215	9,439	-96.5	1,285,311	30,480	-97.6
First-time homebuyer credit used to offset other taxes	30,836	* 2,456	-92.0	40,033	* 2,378	-94.1
First-time homebuyer credit refundable portion	216,443	12,410	-94.3	969,127	65,851	-93.2
<b>Total Regulated Investment Company credit</b>	<b>N/A</b>	<b>155,710</b>	<b>[9]</b>	<b>N/A</b>	<b>1,325,540</b>	<b>[9]</b>
Regulated Investment Company credit used to offset income tax before credits	N/A	28,232	[9]	N/A	27,924	[9]
Regulated Investment Company credit used to offset other taxes	N/A	* 7	[9]	N/A	* 28	[9]
Regulated Investment Company credit refundable portion	N/A	145,296	[9]	N/A	1,297,588	[9]
<b>Total adoption credit</b>	<b>96,949</b>	<b>46,384</b>	<b>-52.2</b>	<b>1,216,411</b>	<b>579,536</b>	<b>-52.4</b>
Adoption credit used to offset income tax before credits	46,698	29,809	-36.2	193,144	188,244	-2.5
Adoption credit used to offset other taxes	15,884	6,693	-57.9	34,536	8,028	-76.8
Adoption credit refundable portion	76,521	28,757	-62.4	988,731	383,264	-61.2
<b>Total refundable prior year minimum tax credit</b>	<b>240,863</b>	<b>205,739</b>	<b>-14.6</b>	<b>765,882</b>	<b>540,681</b>	<b>-29.4</b>
Refundable prior year minimum tax credit used to offset income tax before credits	201,041	175,250	-12.8	508,072	442,446	-12.9
Refundable prior year minimum tax credit used to offset other taxes	7,722	7,619	-1.3	23,249	14,024	-39.7
Refundable prior year minimum tax credit refundable portion	41,251	26,250	-36.4	234,561	84,211	-64.1
<b>Total health insurance credit</b>	<b>N/A</b>	<b>21,111</b>	<b>[9]</b>	<b>N/A</b>	<b>53,923</b>	<b>[9]</b>
Health insurance credit used to offset income tax before credits	N/A	17,462	[9]	N/A	28,417	[9]
Health insurance credit used to offset other taxes	N/A	* 1,392	[9]	N/A	* 3,112	[9]
Health insurance credit refundable portion	N/A	8,974	[9]	N/A	22,394	[9]
Self-employment tax	17,475,401	18,077,044	3.4	45,022,813	42,824,983	-4.9
<b>Total income tax</b>	<b>84,465,993</b>	<b>91,832,424</b>	<b>8.7</b>	<b>944,505,236</b>	<b>1,037,484,722</b>	<b>9.8</b>
<b>Total tax liability</b>	<b>88,401,489</b>	<b>95,583,556</b>	<b>8.1</b>	<b>986,772,646</b>	<b>1,078,896,610</b>	<b>9.3</b>

\* Estimate should be used with caution because of the small number of sample returns on which it is based.

N/A—Not applicable.

[1] Included in data for Forms 1040, 1040A, and 1040EZ.

[2] Not included in adjusted gross income.

[3] Includes capital gain distributions reported on Form 1040 and Schedule D.

[4] Other adjustments does not include the foreign housing deduction or the medical savings account deduction.

[5] Data shown in columns 1 and 2 are the number of exemptions claimed on returns, rather than the number of returns with exemptions.

[6] For Tax Year 2010, the additional standard deduction included increases for age and blindness, new motor vehicle taxes, or net disaster loss. For Tax Year 2011, the additional standard deduction included age and blindness.

[7] State and local income taxes is the total of both income taxes and general sales taxes.

[8] For 2011, includes EIC, American opportunity credit, first-time home buyer credit, regulated investment company credit, refundable adoption credit, refundable prior year minimum tax credit, and health insurance credit, used to offset income tax before credits, shown separately later in this figure.

[9] Percentage not computed.

NOTE: Detail may not add to totals because of rounding.

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\$82.2 billion, and the charitable contributions deduction, which increased 1.4 percent to \$160.3 billion in 2011.

Total tax credits (excluding the “refundable” portions, as well as any amount of these credits used to offset any other taxes) decreased 37.0 percent in 2011 to \$70.5 billion. The making work pay credit expired at the end of 2010, which accounted for the substantial amount of decrease. The adoption credit dropped 52.4 percent to \$0.6 billion, after increasing more than threefold in 2010. The 2010 amount was large due to the law change eliminating carryforwards and making all carryforwards from 2005 to 2009 eligible to be claimed as the first-time refundable adoption credit in 2010. The first-time homebuyer credit expired at the end of 2010 for most taxpayers (see Changes in Law section); this resulted in the total amount of credits claimed dropping by \$1.3 billion (with total credits including refundable decreasing by \$2.2 billion). Residential energy credits taken decreased 72.9 percent, from \$6.3 billion in 2010 to \$1.7 billion in 2011. This decrease was due to a tax law change in 2011, which limited the nonbusiness residential energy credits to a lifetime limit of \$500 (see Changes in Law section).

For 2011, the earned income credit (EIC) increased 5.7 percent to \$64.4 billion. The EIC eligibility limits on the amounts of earned income and investment income increased slightly in 2011 (see Changes in Law section). The portion of the EIC used to offset income tax before credits rose significantly, 138.7 percent, from \$460.6 million to \$1.1 billion. The large increase was due to the expiration of the making work pay credit, which previously was used to offset income tax amounts before the EIC. The portion of the EIC used to offset other taxes (such as the self-employment tax) rose 35.3 percent to \$6.7 billion. The largest part of the EIC, the refundable portion, was paid directly to taxpayers who had no tax liability against which to apply the credit. The refundable portion of the EIC increased 2.0 percent to \$56.6 billion for 2011.

The American opportunity credit increased from \$10.7 billion to \$11.7 billion, an 8.8 percent increase for 2011. For this credit, 7.7 million returns claimed a refundable amount totaling \$6.7 billion. The additional child tax credit increased 3.3 percent to \$29.0 billion. Nearly all (\$28.0 billion) of the additional child tax credit was refundable. Other credits besides the previously mentioned adoption credit, first-time homebuyer credit, EIC, American opportunity credit, and additional child tax credit that could be used to offset other taxes and could also be refundable included the Regulated Investment Company credit, refundable prior-year minimum tax credit, and health insurance credit. Taxpayers received

a total of \$93.3 billion of refundable credits for 2011, exceeding the \$70.5 billion in total tax credits used against income tax.

The comparisons of data for Tax Years 2010 and 2011 in this article are based on preliminary estimates. Even though final estimates for Tax Year 2010 are available, comparing preliminary estimates for Tax Year 2011 to final estimates may yield misleading results, because preliminary estimates tend to be underestimated for certain items. Comparisons based entirely on preliminary estimates reduce the likelihood of misinterpretation of the data and afford a more accurate representation of year-to-year changes. [Final statistics for Tax Year 2010 are available in the Fall 2012 issue of the *SOI Bulletin* and *Statistics of Income—2010, Individual Income Tax Returns*.]

## Changes in Law

In general, the definitions used in this article are the same as those in *Statistics of Income—2010, Individual Income Tax Returns*. The following is a partial list of tax law and Internal Revenue Service administrative changes that had a major bearing on the Tax Year 2011 preliminary data presented in this article.

**Alternative minimum tax (AMT)**—For Tax Year 2011, the minimum exemption increased from \$72,450 to \$74,450 for a married couple filing a joint return and from \$47,450 to \$48,450 for singles and heads of household, and from \$36,225 to \$37,225 for a married person filing separately.

**Capital gains and losses**—In most cases, capital gains and losses had to be reported on the new Form 8949, *Sales and Other Dispositions of Capital Assets*, and the totals reported on Schedule D. Form 8949 is used to report the sale or exchange of a capital asset not reported on another form, gains from involuntary conversions of capital assets not held for business or profit, and nonbusiness bad debts.

**Earned income credit**—The maximum amount of the earned income credit increased, as did the amounts of earned income and investment income an individual could have and still claim the credit. For 2011, the EIC increased for taxpayers with three or more children. The maximum credit for taxpayers with three or more qualifying children increased from \$5,666 to \$5,751. For these taxpayers, earned income and AGI had to be less than \$43,998 (\$49,078 if married filing jointly) to be eligible for the EIC. The maximum credit for taxpayers with no qualifying children rose to \$464. For these taxpayers, earned income and AGI had to be less than \$13,660

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(\$18,740 if married filing jointly) to be eligible for the EIC. For taxpayers with one qualifying child, the maximum credit increased from \$3,050 to \$3,094 and, for taxpayers with two qualifying children, the maximum credit increased from \$5,036 to \$5,112. To be eligible for the credit, a taxpayer's earned income and AGI had to be less than \$36,052 (\$41,132 for married filing jointly) for one qualifying child, or less than \$40,964 (\$46,044 for married filing jointly) for two qualifying children. The maximum amount of investment income (interest, dividends, and capital gain income) a taxpayer could have and still claim the credit increased to \$3,150 for the year.

*Exemption amount*—For Tax Year 2011, the exemption amount increased by \$50 to \$3,700.

*First-time homebuyer credit*—To claim this credit in 2011, a taxpayer (or spouse if married) must have been a member of the uniformed services or Foreign Service, or employees of the intelligence community on extended duty outside the United States for at least 90 days during the period beginning December 31, 2008, and ending before May 1, 2010.

*Health savings account and Archer MSA distributions*—The additional tax on distributions from HSAs and Archer MSAs not used for qualified medical expenses increased from 10 percent to 20 percent for distributions after 2010.

*Indexing*—The following items increased due to indexing for inflation: personal exemption amounts, basic standard deduction amounts, and tax bracket boundaries. The maximum amount of earnings subject to self-employment tax increased based on the percentage change in average covered earnings.

*Individual Retirement Arrangement deduction*—The phase-out range for IRA deductions for those covered by a retirement plan began at an AGI of \$90,000 if married filing jointly or a qualifying widow(er), up from \$89,000 in 2010. For 2010, the modified-AGI limit on rollovers and conversions to Roth IRAs was eliminated for one year. In addition, the taxpayer had the right to move half of the taxable income realized from the rollover or conversion to be included in their 2011 AGI and half in 2012. Alternatively, a taxpayer could have included all of the realized income in 2010.

*Making work pay credit*—The making work pay credit expired and was no longer available for 2011.

*Residential energy credits*—The nonbusiness energy property credit was available for property placed in

service in 2011. However, the credit now had a lifetime limit of \$500, of which only \$200 may have been used for windows. Subject to the lifetime limits, only 10 percent of the qualified energy efficiency improvements were allowed. Subject to the lifetime limits, the residential energy property costs were limited to \$300 for energy efficient building property, \$150 for any qualified natural gas, propane, or oil furnace or hot water boiler, and \$50 for any advanced main air circulating fan.

*Self-employed health insurance deduction*—In 2011, this deduction was no longer allowed on Schedule SE. For 2010, the taxpayer could reduce their self-employment income on Schedule SE by this amount.

*Self-employment tax*—For 2011, the Social Security tax on earned income decreased from 12.4 percent to 10.4 percent. However, the calculation for the adjustment for the deductible part of the self-employment tax was adjusted upward as if the tax was still 12.4 percent.

*Standard deduction amount*—The standard deduction for people who did not itemize deductions on Schedule A of Form 1040 was higher for 2011 than it was in 2010. The amount depended on filing status, being 65 or older or blind, and whether an exemption could be claimed for a taxpayer by another person. For 2011, the standard deduction increased to \$11,600 for joint filers, up from \$11,400 in 2010. For single filers and married filing separate filers, the deduction amount increased to \$5,800, up from \$5,700. For heads of households, the deduction was \$8,500, up from \$8,400. The additional standard deduction for being 65 or older or blind was also increased by \$50 for each taxpayer. In addition, Schedule L, *Standard Deduction for Certain Filers*, was no longer in use and not needed to calculate the standard deduction for certain taxpayers.

## Data Sources and Limitations

The preliminary statistics in this data release are based on a sample of individual income tax returns (Forms 1040, 1040A, and 1040EZ, including electronically filed returns) filed during Calendar Year 2012. Returns in the sample were stratified based on: (1) the larger of positive income or negative income; (2) the size of business and farm receipts; (3) the presence or absence of specific forms or schedules; and (4) the usefulness of returns for Treasury Department tax modeling purposes.<sup>3</sup> Returns were then selected at rates ranging from 0.1 percent to 100 percent. The preliminary Tax Year 2011 data are

<sup>3</sup> Returns in the sample were stratified based on the presence or absence of one or more of the following forms or schedules: Form 2555, *Foreign Earned Income*; Form 1116, *Foreign Tax Credit (Individual, Fiduciary, or Nonresident Alien Individual)*; Schedule C, *Profit or Loss from Business (Sole Proprietorship)*; and Schedule F, *Profit or Loss from Farming*.

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based on a sample of 253,142 returns and an estimated final population of 145,675,989 returns. The corresponding sample and population for the preliminary 2010 data were 237,403 returns and 142,961,416 returns, respectively.

Since the data presented here are estimates based on a sample of returns filed, they are subject to sampling error. To properly use the statistical data provided, the magnitude of the potential sampling error must be known; coefficients of variation (CVs) are used to measure that magnitude. [The reliability of estimates based on samples, and the use of coefficients of variation for evaluating the precision of estimates based on samples,

are discussed in SOI Sampling Methodology and Data Limitations, later in this issue of the *SOI Bulletin*.]

While the preliminary estimates are intended to represent a full year of taxpayer reporting, they are actually based on returns processed for tax administration purposes; in the case of 2011 returns, between January and late September of 2012. In general, returns processed during the remainder of each year tend to have somewhat different characteristics compared to returns processed earlier. These characteristics include, for example, disproportionately large amounts of investment income, passive losses, and alternative minimum tax.

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**Table 1. Individual Income Tax Returns, Tax Year 2011 Preliminary Data: Selected Income and Tax Items, by Size of Adjusted Gross Income**

[All figures are estimates based on samples —money amounts are in thousands of dollars]

Item	All returns	Size of adjusted gross income						
		Under \$15,000 [1]	\$15,000 under \$30,000	\$30,000 under \$50,000	\$50,000 under \$100,000	\$100,000 under \$200,000	\$200,000 under \$250,000	\$250,000 or more
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
<b>Number of returns, total</b>	<b>145,579,530</b>	<b>38,350,460</b>	<b>31,200,606</b>	<b>25,524,238</b>	<b>30,961,024</b>	<b>14,820,629</b>	<b>1,732,611</b>	<b>2,989,961</b>
Form 1040 returns	83,962,280	14,539,242	11,975,625	13,937,866	24,365,779	14,421,195	1,732,611	2,989,961
Form 1040A returns	38,974,100	11,521,132	13,831,603	8,149,688	5,124,978	346,700	0	0
Form 1040EZ returns	22,643,149	12,290,087	5,393,378	3,436,683	1,470,267	52,734	0	0
Electronically-filed returns [2]	120,375,055	30,554,161	26,214,362	21,375,763	25,738,250	12,542,403	1,453,245	2,496,870
<b>Adjusted gross income (less deficit)</b>	<b>8,292,393,204</b>	<b>94,258,272</b>	<b>685,136,800</b>	<b>997,232,561</b>	<b>2,204,778,844</b>	<b>1,985,851,935</b>	<b>384,427,706</b>	<b>1,940,707,087</b>
Salaries and wages:								
Number of returns	120,317,238	27,372,573	25,747,902	22,382,437	27,137,290	13,421,211	1,588,624	2,667,201
Amount	6,161,526,961	225,371,224	531,157,927	805,755,753	1,702,954,988	1,536,182,157	285,452,534	1,074,652,377
Taxable interest:								
Number of returns	52,396,110	7,780,468	6,466,898	7,831,206	15,640,758	10,485,295	1,452,035	2,739,449
Amount	98,356,849	9,901,785	7,839,432	9,409,287	18,432,904	17,107,031	4,253,361	31,413,048
Tax-exempt interest: [3]								
Number of returns	5,955,446	549,529	470,802	630,954	1,580,468	1,436,023	306,474	981,196
Amount	66,639,737	3,580,104	2,654,591	3,792,848	10,696,660	12,831,545	3,363,126	29,720,862
Ordinary dividends:								
Number of returns	27,650,383	3,866,405	2,926,029	3,442,250	7,833,296	6,288,943	1,052,688	2,240,771
Amount	169,550,560	7,925,951	7,717,485	10,042,145	27,720,933	30,139,444	8,121,265	77,883,337
Qualified dividends:								
Number of returns	25,052,468	3,415,143	2,580,684	3,081,194	7,035,784	5,802,535	991,451	2,145,678
Amount	125,191,743	4,612,436	4,872,347	6,523,282	17,841,533	21,353,006	6,124,288	63,864,850
State income tax refunds:								
Number of returns	22,405,480	484,553	1,150,891	3,049,875	9,102,172	6,916,333	754,850	946,806
Amount	25,620,717	484,679	611,118	1,888,652	7,533,002	8,302,934	1,335,437	5,464,897
Alimony received:								
Number of returns	434,418	71,353	86,874	117,985	122,035	28,574	4,022	3,574
Amount	8,201,903	489,185	1,007,925	1,553,035	2,815,840	1,536,121	338,762	461,034
Business or profession net income:								
Number of returns	17,317,197	5,779,542	3,112,497	2,213,713	3,361,866	2,006,336	283,304	559,940
Amount	319,286,114	44,312,810	39,336,974	30,821,542	57,697,854	58,405,413	15,880,373	72,831,148
Business or profession net loss:								
Number of returns	5,589,622	1,021,400	898,832	977,193	1,541,994	863,351	108,954	177,898
Amount	52,436,123	17,725,701	7,143,662	6,429,749	9,728,278	6,001,243	1,064,288	4,343,202
Net capital gain: [4]								
Number of returns	10,130,951	1,195,837	1,048,541	1,260,741	2,746,437	2,421,816	456,707	1,000,871
Amount	310,896,415	9,700,732	5,188,549	6,769,029	16,115,360	26,727,919	9,897,512	236,497,315
Capital gain distributions: [4]								
Number of returns	8,824,527	1,129,460	735,184	998,435	2,350,266	2,081,074	412,813	1,117,294
Amount	13,550,709	756,045	580,341	923,796	2,392,176	3,174,586	812,007	4,911,760
Net capital loss:								
Number of returns	11,832,163	2,149,893	1,089,473	1,313,450	3,067,103	2,567,519	489,758	1,154,966
Amount	27,296,431	5,061,259	2,420,647	2,920,769	6,870,081	5,873,078	1,167,021	2,983,576
Sales of property other than capital assets, net gain:								
Number of returns	823,930	120,671	78,181	86,553	219,436	159,772	32,046	127,271
Amount	11,580,564	1,974,540	431,624	555,257	1,564,122	1,574,687	370,963	5,109,371
Sales of property other than capital assets, net loss:								
Number of returns	951,920	177,525	78,498	88,008	202,128	188,125	39,954	177,681
Amount	25,839,094	16,212,957	898,543	843,527	2,094,843	1,944,393	496,302	3,348,528

Footnotes at end of table.

# Individual Income Tax Returns, Preliminary Data, 2011

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**Table 1. Individual Income Tax Returns, Tax Year 2011 Preliminary Data: Selected Income and Tax Items, by Size of Adjusted Gross Income—Continued**

[All figures are estimates based on samples —money amounts are in thousands of dollars]

Item	All returns	Size of adjusted gross income						
		Under \$15,000 [1]	\$15,000 under \$30,000	\$30,000 under \$50,000	\$50,000 under \$100,000	\$100,000 under \$200,000	\$200,000 under \$250,000	\$250,000 or more
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
Taxable Individual Retirement Arrangement distributions:								
Number of returns	13,094,079	1,858,223	2,067,071	2,085,193	4,090,713	2,204,091	288,911	499,878
Amount	216,294,925	9,946,986	14,945,655	20,037,049	62,121,472	59,094,655	11,992,277	38,156,832
Taxable pensions and annuities:								
Number of returns	27,097,754	4,132,898	4,804,717	4,813,168	8,095,477	4,182,865	447,842	620,787
Amount	590,383,592	28,027,110	58,451,877	83,878,215	207,153,052	158,982,982	21,326,307	32,564,049
Rent and royalty net income:								
Number of returns	6,412,113	928,363	757,535	828,129	1,762,967	1,360,056	228,813	546,250
Amount	93,594,726	7,382,039	4,852,924	6,102,327	15,435,690	19,363,148	5,609,003	34,849,594
Rent and royalty net loss:								
Number of returns	5,674,163	833,676	603,807	831,207	1,815,438	1,181,994	119,666	288,375
Amount	58,713,835	13,189,599	4,469,545	7,324,294	15,792,021	10,010,293	1,520,657	6,407,427
Partnership and S corporation net income:								
Number of returns	4,687,703	332,315	325,879	457,882	1,102,936	1,243,572	292,788	932,332
Amount	458,870,831	5,603,909	3,502,439	6,111,431	23,182,103	50,317,690	21,653,907	348,499,352
Partnership and S corporation net loss:								
Number of returns	2,480,085	459,027	214,362	252,127	642,363	541,310	102,453	268,443
Amount	78,250,171	40,596,907	2,397,466	2,900,317	6,602,879	6,898,142	2,141,734	16,712,726
Estate and trust net income:								
Number of returns	514,271	48,517	37,275	50,003	148,257	129,655	26,123	74,441
Amount	18,859,988	508,497	291,924	425,284	1,923,421	2,977,274	731,311	12,002,277
Estate and trust net loss:								
Number of returns	44,852	7,664	* 3,114	7,243	7,925	9,886	2,708	6,312
Amount	1,120,181	463,332	* 26,673	53,283	19,332	65,126	13,672	478,764
Farm net income:								
Number of returns	613,864	110,073	82,605	99,994	184,187	100,220	11,147	25,638
Amount	16,383,985	1,011,822	905,668	1,329,592	4,113,475	4,263,818	1,105,356	3,654,254
Farm net loss:								
Number of returns	1,266,450	254,005	149,861	198,946	377,913	205,506	27,892	52,326
Amount	23,494,561	6,497,179	2,099,241	2,426,299	5,262,873	3,503,314	766,809	2,938,847
Unemployment compensation:								
Number of returns	13,304,580	2,895,144	3,849,547	2,487,795	2,880,532	1,029,463	77,877	84,222
Amount	92,709,719	14,511,300	29,855,028	18,227,471	20,653,837	8,068,611	667,793	725,678
Taxable Social Security benefits:								
Number of returns	16,890,909	140,899	3,219,852	3,941,744	6,283,873	2,563,087	276,431	465,023
Amount	202,974,835	479,976	7,160,726	27,722,842	98,587,210	51,689,478	6,232,551	11,102,052
<b>Total statutory adjustments:</b>								
Number of returns	35,713,497	7,387,436	5,700,354	5,907,496	9,366,074	5,506,151	578,568	1,267,418
Amount	120,286,462	11,888,856	9,546,968	12,461,981	24,427,240	24,215,819	6,084,193	31,661,405
Educator expenses:								
Number of returns	3,879,653	113,967	281,080	692,734	1,547,779	1,091,304	84,145	68,645
Amount	976,767	24,658	63,599	166,701	387,047	296,930	21,254	16,578
Certain business expenses of reservists, performing artists, and fee-basis government officials:								
Number of returns	149,474	17,935	14,675	28,990	45,062	35,896	2,675	4,241
Amount	518,382	107,401	37,401	86,457	141,296	117,801	10,219	17,806

Footnotes at end of table.

# Individual Income Tax Returns, Preliminary Data, 2011

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**Table 1. Individual Income Tax Returns, Tax Year 2011 Preliminary Data: Selected Income and Tax Items, by Size of Adjusted Gross Income—Continued**

[All figures are estimates based on samples —money amounts are in thousands of dollars]

Item	All returns	Size of adjusted gross income						
		Under \$15,000 [1]	\$15,000 under \$30,000	\$30,000 under \$50,000	\$50,000 under \$100,000	\$100,000 under \$200,000	\$200,000 under \$250,000	\$250,000 or more
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
Payments to an Individual Retirement Arrangement:								
	Number of returns	2,616,065	108,493	316,153	560,777	950,111	560,356	42,699
Student loan interest deduction:	Amount	11,255,268	333,427	938,161	2,103,401	3,968,140	2,873,634	356,357
	Number of returns	10,183,878	902,069	1,760,344	2,470,851	3,588,208	1,462,406	0
Tuition and fees deduction:	Amount	9,826,305	789,818	1,594,673	2,537,109	3,614,380	1,290,326	0
	Number of returns	1,957,339	550,123	236,018	179,967	426,043	565,185	0
Health savings account deduction:	Amount	4,357,612	1,600,649	508,996	362,821	828,289	1,056,842	0
	Number of returns	981,452	32,920	78,744	120,400	298,814	254,059	145,585
Moving expenses adjustment:	Amount	2,934,461	85,449	137,047	220,089	734,005	878,170	197,837
	Number of returns	1,024,723	103,515	192,313	213,967	308,084	152,096	31,731
Self-employment tax deduction:	Amount	4,170,682	1,484,510	417,104	402,498	909,957	608,097	123,492
	Number of returns	18,077,044	5,659,790	3,148,845	2,284,088	3,511,243	2,259,097	856,308
Self-employed health insurance deduction:	Amount	24,112,872	3,258,949	3,007,183	2,566,879	4,923,208	4,727,235	1,122,820
	Number of returns	3,569,236	544,215	427,342	491,573	850,889	680,881	432,222
Payments to a self-employed retirement (Keogh) plan:	Amount	22,114,796	2,155,927	1,741,713	2,336,683	4,604,911	5,044,595	1,295,901
	Number of returns	869,952	14,506	27,952	44,198	152,053	259,291	88,888
Penalty on early withdrawal of savings:	Amount	17,621,794	94,065	147,949	327,755	1,398,135	3,786,684	1,949,612
	Number of returns	1,061,787	260,054	191,662	170,935	274,449	122,791	16,393
Alimony paid:	Amount	2,089,469	914,639	509,729	512,698	80,833	30,341	5,384
	Number of returns	583,132	48,281	37,425	73,367	197,085	135,788	23,467
Domestic production activities deduction:	Amount	10,339,024	693,100	230,112	563,216	2,148,627	2,379,221	691,005
	Number of returns	616,344	42,571	32,313	55,748	149,208	161,172	33,978
Other adjustments [5]:	Amount	8,447,895	276,637	75,076	130,714	426,013	774,477	233,111
	Number of returns	144,280	12,232	21,031	29,252	46,107	25,493	4,025
Total exemptions:	Amount	1,412,611	60,533	131,488	137,715	243,270	344,309	73,287
	Number of exemptions	290,959,379	49,769,703	60,660,660	52,142,563	73,010,092	41,494,223	5,059,100
Total deductions:	Amount	1,076,128,195	184,031,742	224,344,646	192,865,474	270,068,104	153,492,970	18,712,390
	Number of returns	143,239,893	36,012,957	31,200,606	25,523,226	30,960,009	14,820,595	1,732,587
Total standard deduction [6]:	Amount	1,940,352,305	252,979,729	272,642,268	265,265,292	469,061,909	360,435,016	64,672,648
	Number of returns	97,014,844	34,259,492	27,558,515	18,535,395	14,051,594	2,411,835	94,470
Basic standard deduction:	Amount	774,073,808	226,653,974	217,675,021	157,495,849	142,545,232	27,485,904	1,091,254
	Number of returns	97,014,844	34,259,492	27,558,515	18,535,395	14,051,594	2,411,835	94,470
Footnotes at end of table.	Amount	751,058,261	219,498,043	211,929,773	153,493,278	137,762,834	26,275,445	1,028,934
								1,069,955

# Individual Income Tax Returns, Preliminary Data, 2011

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**Table 1. Individual Income Tax Returns, Tax Year 2011 Preliminary Data: Selected Income and Tax Items, by Size of Adjusted Gross Income—Continued**

[All figures are estimates based on samples—money amounts are in thousands of dollars]

Item	All returns	Size of adjusted gross income						
		Under \$15,000 [1]	\$15,000 under \$30,000	\$30,000 under \$50,000	\$50,000 under \$100,000	\$100,000 under \$200,000	\$200,000 under \$250,000	\$250,000 or more
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
Additional standard deduction:								
Number of returns	13,330,220	4,349,116	3,320,564	2,294,171	2,662,962	641,345	32,317	29,744
Amount	22,985,385	7,147,963	5,743,214	3,995,071	4,772,202	1,208,204	62,294	56,438
<b>Total itemized deductions:</b>								
Number of returns	46,225,049	1,753,465	3,642,092	6,987,832	16,908,415	12,408,759	1,638,117	2,886,369
Amount	1,166,278,497	26,325,756	54,967,247	107,769,443	326,516,677	332,949,111	63,581,394	254,168,869
Medical and dental expenses deduction:								
Number of returns	10,300,929	1,238,661	1,840,370	2,304,488	3,635,990	1,161,553	68,042	51,825
Amount	82,154,035	10,343,599	14,425,597	16,000,887	26,817,750	11,618,816	1,144,054	1,803,331
Taxes paid deduction:								
Number of returns	45,904,067	1,686,854	3,567,164	6,900,497	16,835,774	12,394,066	1,636,343	2,883,367
Amount	450,763,322	5,291,125	11,590,424	27,516,813	104,970,794	134,508,988	29,590,191	137,294,986
State and local income taxes: [7]								
Number of returns	44,545,480	1,464,056	3,349,378	6,613,342	16,436,819	12,212,823	1,615,308	2,853,753
Amount	270,951,014	1,073,032	3,406,821	11,000,311	52,861,782	77,228,068	18,772,307	106,608,694
Income taxes:								
Number of returns	33,964,669	467,674	1,721,795	4,623,711	13,060,733	10,295,841	1,385,526	2,409,389
Amount	255,171,898	516,265	2,120,154	8,818,496	47,749,279	73,154,985	18,034,262	104,778,456
General sales taxes:								
Number of returns	10,580,811	996,383	1,627,583	1,989,631	3,376,086	1,916,982	229,782	444,364
Amount	15,779,117	556,766	1,286,667	2,181,815	5,112,503	4,073,082	738,045	1,830,238
Interest paid deduction:								
Number of returns	36,458,783	949,081	2,284,780	5,087,344	13,731,552	10,716,852	1,365,307	2,323,867
Amount	371,622,696	7,036,095	16,783,765	37,827,982	120,393,167	120,737,748	20,775,346	48,068,593
Total home mortgage interest deduction:								
Number of returns	35,971,926	919,921	2,247,357	5,034,145	13,610,204	10,602,429	1,343,642	2,214,228
Amount	358,774,706	6,825,772	16,268,371	36,349,588	116,297,089	119,095,729	20,389,883	43,548,273
Charitable contributions deduction:								
Number of returns	37,858,203	1,075,216	2,500,390	5,102,812	13,870,407	11,086,686	1,514,321	2,708,372
Amount	160,336,603	1,552,052	5,317,749	11,670,595	39,957,974	43,122,826	8,636,626	50,078,782
<b>Taxable income:</b>								
Number of returns	108,893,638	9,635,695	24,028,973	24,904,184	30,815,077	14,793,085	1,730,837	2,985,786
Amount	5,695,765,605	26,347,303	227,333,998	543,941,655	1,470,506,465	1,472,814,257	301,277,975	1,653,543,953
Alternative minimum tax:								
Number of returns	4,292,149	10,713	12,753	8,433	147,200	797,070	953,235	2,362,744
Amount	27,021,186	93,194	15,170	24,033	222,615	1,631,439	2,643,886	22,390,848
<b>Income tax before credits:</b>								
Number of returns	107,963,513	9,306,944	23,689,482	24,741,037	30,732,314	14,776,130	1,730,356	2,987,250
Amount	1,107,934,134	2,705,700	25,231,045	67,751,450	214,446,781	262,639,231	66,150,784	469,009,143
<b>Total tax credits: [8]</b>								
Number of returns	49,857,151	2,967,409	11,200,664	11,337,726	14,576,079	7,476,866	699,687	1,598,720
Amount	70,450,947	477,392	6,183,043	12,545,689	24,502,765	12,250,329	958,181	13,533,548
Child care credit:								
Number of returns	6,425,683	13,296	892,940	1,310,588	2,195,781	1,583,869	189,749	239,460
Amount	3,482,560	1,626	401,352	774,127	1,194,926	882,543	95,379	132,607
Credit for the elderly or disabled:								
Number of returns	115,374	58,859	56,516	0	0	0	0	0
Amount	16,623	9,665	6,958	0	0	0	0	0

Footnotes at end of table.

# Individual Income Tax Returns, Preliminary Data, 2011

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**Table 1. Individual Income Tax Returns, Tax Year 2011 Preliminary Data: Selected Income and Tax Items, by Size of Adjusted Gross Income—Continued**

[All figures are estimates based on samples—money amounts are in thousands of dollars]

Item	All returns	Size of adjusted gross income						
		Under \$15,000 [1]	\$15,000 under \$30,000	\$30,000 under \$50,000	\$50,000 under \$100,000	\$100,000 under \$200,000	\$200,000 under \$250,000	\$250,000 or more
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
Child tax credit:								
Number of returns	23,308,358	90,846	4,125,009	6,346,825	9,284,930	3,458,159	2,589	0
Amount	28,295,971	11,633	1,910,678	6,464,160	15,112,287	4,795,237	1,976	0
Education tax credits:								
Number of returns	12,233,236	937,172	3,089,599	2,871,751	3,568,295	1,766,419	0	0
Amount	12,572,522	234,245	2,325,048	2,963,561	4,487,512	2,562,157	0	0
Retirement savings contributions credit:								
Number of returns	6,504,841	273,224	2,868,104	2,584,173	779,340	0	0	0
Amount	1,140,959	46,290	493,065	474,512	127,093	0	0	0
Residential energy credits:								
Number of returns	3,722,744	38,524	284,725	666,796	1,489,924	968,390	111,538	162,845
Amount	1,709,046	8,123	69,822	231,794	517,262	514,772	100,363	266,910
Foreign tax credit:								
Number of returns	6,898,513	147,988	414,970	722,445	2,043,863	1,933,385	418,317	1,217,546
Amount	13,485,943	8,945	46,200	128,141	485,808	1,086,223	566,564	11,164,061
General business credit:								
Number of returns	428,063	3,339	10,535	17,220	95,525	134,570	36,143	130,732
Amount	1,842,613	2,194	6,822	17,578	138,623	327,749	114,616	1,235,030
Prior year minimum tax credit:								
Number of returns	239,841	* 3,963	* 3,823	9,511	31,932	112,561	25,214	52,836
Amount	545,769	* 1,178	* 1,492	11,647	50,935	120,814	32,912	326,789
<b>Total earned income credit (EIC):</b>								
Number of returns	28,314,220	14,226,339	9,639,523	4,448,357	0	0	0	0
Amount	64,411,121	26,619,238	31,879,858	5,912,025	0	0	0	0
EIC used to offset income tax before credits:								
Number of returns	3,761,542	1,398,359	995,102	1,368,081	0	0	0	0
Amount	1,099,646	122,618	450,964	526,065	0	0	0	0
EIC used to offset other taxes:								
Number of returns	6,871,375	4,146,769	1,967,725	756,881	0	0	0	0
Amount	6,690,796	3,443,008	2,645,970	601,818	0	0	0	0
EIC, refundable portion:								
Number of returns	25,044,745	12,237,286	9,374,650	3,432,809	0	0	0	0
Amount	56,620,678	23,053,612	28,782,924	4,784,142	0	0	0	0
<b>Total American opportunity credit:</b>								
Number of returns	13,016,424	3,470,324	3,072,597	2,133,053	2,666,457	1,673,994	0	0
Amount	11,690,654	3,095,120	2,669,704	1,824,454	2,455,017	1,646,360	0	0
Refundable American opportunity credit used to offset income tax before credits:								
Number of returns	6,007,342	35,339	791,282	1,143,430	2,371,631	1,665,660	0	0
Amount	4,727,606	3,969	325,296	755,957	2,008,028	1,634,355	0	0
Refundable American opportunity credit used to offset other taxes:								
Number of returns	603,649	213,678	134,733	145,167	105,567	4,505	0	0
Amount	298,149	79,782	60,763	83,250	69,967	4,387	0	0
Refundable American opportunity credit refundable portion:								
Number of returns	7,743,406	3,414,892	2,707,910	1,183,138	425,521	11,945	0	0
Amount	6,664,899	3,011,369	2,283,645	985,246	377,022	7,618	0	0

Footnotes at end of table.

# Individual Income Tax Returns, Preliminary Data, 2011

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**Table 1. Individual Income Tax Returns, Tax Year 2011 Preliminary Data: Selected Income and Tax Items, by Size of Adjusted Gross Income—Continued**

[All figures are estimates based on samples —money amounts are in thousands of dollars]

Item	All returns	Size of adjusted gross income						
		Under \$15,000 [1]	\$15,000 under \$30,000	\$30,000 under \$50,000	\$50,000 under \$100,000	\$100,000 under \$200,000	\$200,000 under \$250,000	\$250,000 or more
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
<b>Total additional child tax credit:</b>								
Number of returns	21,520,041	6,831,390	9,468,645	4,208,472	990,709	20,817	* 7	0
Amount	29,040,027	6,754,377	14,330,186	6,623,538	1,307,457	24,462	* 7	0
Additional child tax credit used to offset other taxes:								
Number of returns	1,170,200	163,405	283,815	434,545	282,401	6,034	0	0
Amount	1,074,599	148,006	289,355	411,765	220,357	5,116	0	0
Additional child tax credit refundable portion:								
Number of returns	20,878,669	6,722,074	9,320,197	3,971,938	846,544	17,908	* 7	0
Amount	27,965,428	6,606,371	14,040,832	6,211,773	1,087,100	19,346	* 7	0
<b>Total first-time homebuyer credit:</b>								
Number of returns	13,574	* 1,025	* 2,124	* 5,536	* 4,102	* 412	* 376	0
Amount	98,709	* 7,692	* 12,897	* 40,187	* 32,817	* 2,673	* 2,442	0
First-time homebuyer credit used to offset income tax before credits:								
Number of returns	9,439	0	* 1,053	* 3,496	* 4,102	* 412	* 376	0
Amount	30,480	0	* 524	* 6,054	* 18,786	* 2,673	* 2,442	0
First-time homebuyer credit used to offset other taxes:								
Number of returns	* 2,456	0	* 59	* 1,400	* 997	0	0	0
Amount	* 2,378	0	* 217	* 2,153	* 8	0	0	0
First-time homebuyer credit refundable portion:								
Number of returns	12,410	* 1,025	* 2,124	* 5,160	* 4,102	0	0	0
Amount	65,851	* 7,692	* 12,156	* 31,979	* 14,024	0	0	0
<b>Total Regulated Investment Company credit:</b>								
Number of returns	155,710	8,392	77,915	59,909	4,157	1,477	* 867	2,994
Amount	1,325,540	45,127	695,127	531,173	38,229	930	* 4,634	10,320
Regulated Investment Company credit used to offset income tax before credits:								
Number of returns	28,232	* 3,124	* 9,476	* 6,246	* 4,092	* 1,455	* 859	2,980
Amount	27,924	* 294	* 5,275	* 4,311	* 4,369	* 176	* 4,632	8,867
Regulated Investment Company credit used to offset other taxes:								
Number of returns	* 7	**	0	0	**	** 7	0	0
Amount	* 28	**	0	0	**	** 28	0	0
Regulated Investment Company credit refundable portion:								
Number of returns	145,296	7,372	77,915	57,868	* 2,096	* 18	* 7	19
Amount	1,297,588	44,833	689,852	526,863	* 33,860	* 726	* 2	1,453
<b>Total adoption credit:</b>								
Number of returns	46,384	3,742	* 5,230	* 4,079	18,045	14,295	* 993	0
Amount	579,536	62,924	* 99,588	* 44,460	174,367	195,095	* 3,102	0
Adoption credit used to offset income tax before credits:								
Number of returns	29,809	0	0	* 2,027	12,504	14,289	* 990	0
Amount	188,244	0	0	* 4,683	42,969	137,506	* 3,085	0
Adoption credit used to offset other taxes:								
Number of returns	6,693	0	* 1,028	* 1,028	* 2,469	* 2,166	0	0
Amount	8,028	0	* 2,695	* 843	* 2,057	* 2,432	0	0

Footnotes at end of table.

# Individual Income Tax Returns, Preliminary Data, 2011

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**Table 1. Individual Income Tax Returns, Tax Year 2011 Preliminary Data: Selected Income and Tax Items, by Size of Adjusted Gross Income—Continued**

[All figures are estimates based on samples —money amounts are in thousands of dollars]

Item	All returns	Size of adjusted gross income						
		Under \$15,000 [1]	\$15,000 under \$30,000	\$30,000 under \$50,000	\$50,000 under \$100,000	\$100,000 under \$200,000	\$200,000 under \$250,000	\$250,000 or more
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
Adoption credit refundable portion:								
Number of returns	28,757	3,742	* 5,230	* 3,051	12,309	* 4,422	* 3	0
Amount	383,264	62,923	* 96,893	* 38,934	129,341	* 55,157	* 17	0
<b>Total refundable prior year minimum tax credit:</b>								
Number of returns	205,739	15,745	2,567	5,039	6,163	25,248	29,802	121,174
Amount	540,681	51,205	1,041	10,009	18,796	40,215	33,855	385,559
Refundable prior year minimum tax credit used to offset income tax before credits:								
Number of returns	175,250	54	* 1,065	* 231	1,287	22,193	29,538	120,882
Amount	442,446	670	* 27	* 139	1,673	34,277	31,502	374,158
Refundable prior year minimum tax credit used to offset other taxes:								
Number of returns	7,619	2,563	353	1,182	801	2,297	152	271
Amount	14,024	2,602	132	5,234	2,256	2,201	1,229	371
Refundable prior year minimum tax credit refundable portion:								
Number of returns	26,250	14,562	1,220	3,683	4,906	1,034	261	585
Amount	84,211	47,933	882	4,636	14,867	3,738	1,124	11,031
<b>Total health insurance credit:</b>								
Number of returns	21,111	* 62	* 4,212	** 11,325	* 4,634	**	* 353	* 526
Amount	53,923	* 494	* 10,008	** 34,777	* 7,110	**	* 648	* 887
Health insurance credit used to offset income tax before credits:								
Number of returns	17,462	0	* 3,159	** 8,791	* 4,634	**	* 353	* 526
Amount	28,417	0	* 992	** 18,780	* 7,110	**	* 648	* 887
Health insurance credit used to offset other taxes:								
Number of returns	* 1,392	0	0	* 1,392	0	0	0	0
Amount	* 3,112	0	0	* 3,112	0	0	0	0
Health insurance credit refundable portion:								
Number of returns	8,974	* 62	* 3,159	** 5,753	0	**	0	0
Amount	22,394	* 494	* 9,016	** 12,884	0	**	0	0
<b>Self-employment tax:</b>								
Number of returns	18,077,044	5,659,790	3,148,845	2,284,088	3,511,243	2,259,097	357,672	856,308
Amount	42,824,983	5,729,532	5,277,122	4,512,972	8,650,202	8,313,891	1,995,707	8,345,557
<b>Total income tax:</b>								
Number of returns	91,832,424	7,522,786	15,882,502	19,556,113	29,449,399	14,716,763	1,726,508	2,978,353
Amount	1,037,484,722	2,228,308	19,048,721	55,205,762	189,944,016	250,388,902	65,192,603	455,476,410
<b>Total tax liability:</b>								
Number of returns	95,583,556	10,015,650	16,479,589	19,982,117	29,666,263	14,732,280	1,727,644	2,980,013
Amount	1,078,896,610	4,437,162	21,687,966	59,352,677	200,195,973	260,688,700	67,577,698	464,956,433

\* Estimate should be used with caution because of the small number of sample returns on which it is based.

\*\* Data combined to prevent disclosure of information for specific taxpayers.

[1] Includes returns with adjusted gross deficit.

[2] Included in data for Forms 1040, 1040A, and 1040EZ.

[3] Not included in adjusted gross income.

[4] Includes capital gain distributions reported on Form 1040 and Schedule D.

[5] Other adjustments does not include the foreign housing deduction or the medical savings account deduction.

[6] Includes additional real estate taxes, motor vehicle taxes, and net disaster loss deductions from prior years.

[7] State and local income taxes is the total of both income taxes and general sales taxes.

[8] Includes EIC, American opportunity credit, first-time home buyer credit, regulated investment company credit, refundable adoption credit, refundable prior year minimum tax credit, and health insurance credit, used to offset income tax before credits, shown separately later in this figure.

NOTE: Detail may not add to totals because of rounding.

# Individual Income Tax Rates and Shares, 2010

by Adrian Dungan and Michael Parisi

Taxpayers filed 142.9 million individual income tax returns for Tax Year 2010. Of those, 84.5 million (or 59.1 percent) were classified as taxable returns. A taxable return is a return that has total income tax greater than \$0. The 59.1 percent represents the second lowest percentage of taxable returns in more than 25 years, with 2009 having been the lowest at 58.3 percent. Adjusted gross income (AGI) on these taxable returns increased 6.9 percent to \$7.25 trillion for 2010, while total income tax increased 9.9 percent to \$952 billion.<sup>1</sup> The average tax rate for taxable returns increased 0.4 percentage points to 13.1 percent.

The top 1 percent of tax returns, with AGI of at least \$369,691, accounted for 18.9 percent of total AGI for 2010.<sup>2</sup> This represents an increase in income share of 1.7 percentage points from the previous year, when the cutoff for this group was \$351,968. These taxpayers accounted for 37.4 percent of the total income tax reported, an increase from 36.3 percent in 2009. The top 5 percent of tax returns accounted for 33.8 percent of total AGI and 59.1 percent of total income tax for 2010. To be included in the top 5 percent, a tax return must have had AGI of at least \$161,579, whereas, in 2009, the cutoff for this group was \$157,342.

This article discusses the individual income tax rates and tax shares and the computation of “total income tax” for 2010. To put this discussion into perspective, the article provides explanations of selected terms used in the article and describes the income tax structure, certain tax law changes, income and tax concepts (the “1979 Income Concept,” “modified” taxable income, and marginal tax rates), the computation of “alternative minimum taxable income,” and data sources and limitations.

## Income Tax Rates

Discussions of income tax rates generally involve measuring two distinct tax rates: average tax rates and marginal tax rates. Average tax rates are calculated

by dividing some measure of tax by some measure of income. Generally, for the statistics in this article, the average tax rate is “total income tax” (see the Explanation of Selected Terms section of this article) divided by AGI reported on returns showing some income tax liability.

Measures of marginal tax rates focus on determining the tax rate imposed on the last (or next) dollar of income received by a taxpayer. For this article, the marginal tax rate is the statutory rate at which the last dollar of taxable income is taxed. (See the Income and Tax Concepts section of this article for a more detailed explanation of marginal tax rates.) The following sections describe the measurement of average and marginal tax rates in more detail and discuss the statistics based on these rates for 2010.

## Average Tax Rates

Figure A presents statistics for 1986 through 2010 on income (based on each year’s definition of AGI and on the common 1979 Income Concept) and taxes reported. (See the Income and Tax Concepts section and Figure G of this article for a more detailed explanation of the 1979 Income Concept.) These tax years can be partitioned into eight distinct periods:

- 1) Tax Year 1986 was the last year under the Economic Recovery Tax Act of 1981 (ERTA81). The tax bracket boundaries, personal exemptions, and standard deductions were indexed for inflation, and the maximum tax rate was 50 percent.
- 2) Tax Year 1987 was the first year under the Tax Reform Act of 1986 (TRA86). For 1987, a 1-year, transitional, five-rate tax bracket structure was established with a partial phase-in of new provisions that broadened the definition of AGI. The maximum tax rate was 38.5 percent.
- 3) During Tax Years 1988 through 1990, there was effectively a three-rate tax bracket structure.<sup>3</sup> The phase-in of the provisions of TRA86 continued with a maximum tax rate of 33 percent.
- 4) Tax Years 1991 and 1992 brought a three-rate tax bracket structure (with a maximum tax rate of 31

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<sup>1</sup> Total income tax is limited to zero and thus does not include refundable credits.

<sup>2</sup> The number of returns with zero or negative adjusted gross income, and the corresponding amounts for adjusted gross deficit, were excluded. By excluding deficit returns, alternative minimum tax reported on some of these returns was also excluded. For Tax Year 2010, there were 2.6 million returns with zero or negative AGI excluded, including 6,014 returns with no adjusted gross income that reported income tax.

<sup>3</sup> For Tax Years 1988 through 1990, the tax rate schedules provided only two basic rates: 15 percent and 28 percent. However, taxable income over certain levels was subject to a 33-percent tax rate to phase out the benefit of the 15-percent tax bracket (as compared to the 28-percent rate) and the deduction for personal exemptions. At the taxable income level where these benefits were completely phased out, the tax rate returned to 28 percent.

# Individual Income Tax Rates and Shares, 2010

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## Figure A

### Total Number of Returns, and Selected Income and Tax Items for Taxable Returns, Tax Years 1986–2010

[Money amounts are in billions of dollars, except where indicated]

Tax year	Total number of returns	Taxable returns						Average per return (whole dollars) [3]			
		Number of returns	As a percentage of total returns [1]	Adjusted gross income (less deficit)	Total income tax	Average tax rate (percent) [2],[3]	Current dollars		Constant dollars [4]		
							Adjusted gross income (less deficit)	Total income tax	Adjusted gross income (less deficit)	Total income tax	
		(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)
Using each tax year's adjusted gross income											
1986	103,045,170	83,967,413	81.5	2,440	367	15.1	29,062	4,374	26,516	3,991	
1987	106,996,270	86,723,796	81.1	2,701	369	13.7	31,142	4,257	27,414	3,747	
1988	109,708,280	87,135,332	79.4	2,990	413	13.8	34,313	4,738	29,005	4,005	
1989	112,135,673	89,178,355	79.5	3,158	433	13.7	35,415	4,855	28,560	3,915	
1990	113,717,138	89,862,434	79.0	3,299	447	13.6	36,711	4,976	28,088	3,807	
1991	114,730,123	88,733,587	77.3	3,337	448	13.4	37,603	5,054	27,609	3,711	
1992	113,604,503	86,731,946	76.3	3,484	476	13.7	40,168	5,491	28,630	3,914	
1993	114,601,819	86,435,367	75.4	3,564	503	14.1	41,233	5,817	28,535	4,026	
1994	115,943,131	87,619,446	75.6	3,737	535	14.3	42,646	6,104	28,776	4,119	
1995	118,218,327	89,252,989	75.5	4,008	588	14.7	44,901	6,593	29,463	4,326	
1996	120,351,208	90,929,350	75.6	4,342	658	15.2	47,750	7,239	30,433	4,614	
1997	122,421,991	93,471,200	76.4	4,765	731	15.3	50,980	7,824	31,763	4,875	
1998	124,770,662	93,047,898	74.6	5,160	789	15.3	55,458	8,475	33,836	5,171	
1999	127,075,145	94,546,080	74.4	5,581	877	15.7	59,028	9,280	35,431	5,570	
2000	129,373,500	96,817,603	74.8	6,083	981	16.1	62,832	10,129	36,488	5,882	
2001	130,255,237	94,763,530	72.8	5,847	888	15.2	61,702	9,370	34,840	5,291	
2002	130,076,443	90,963,896	69.9	5,641	797	14.1	62,015	8,762	34,472	4,870	
2003	130,423,626	88,921,904	68.2	5,747	748	13.0	64,625	8,412	35,122	4,572	
2004	132,226,042	89,101,934	67.4	6,266	832	13.3	70,318	9,337	37,225	4,943	
2005	134,372,678	90,593,081	67.4	6,857	935	13.6	75,687	10,319	38,754	5,284	
2006	[5] 138,394,754	92,740,927	67.0	7,439	1,024	13.8	80,218	11,041	39,791	5,477	
2007	[6] 142,978,806	96,272,958	67.3	8,072	1,116	13.8	83,851	11,588	40,449	5,590	
2008	142,450,569	90,660,104	63.6	7,583	1,032	13.6	83,647	11,379	38,851	5,285	
2009	140,494,127	81,890,189	58.3	6,778	866	12.8	82,765	10,575	38,579	4,929	
2010	142,892,051	84,475,933	59.1	7,246	952	13.1	85,778	11,266	39,338	5,166	

Footnotes at end of figure.

percent), a limitation on some itemized deductions, and a phase-out of personal exemptions for some upper-income taxpayers.

- 5) Tax Years 1993 through 1996 had a five-rate tax bracket structure (with a maximum statutory tax rate of 39.6 percent), a limitation on some itemized deductions, and a phase-out of personal exemptions for some upper-income taxpayers.
- 6) Tax Years 1997 through 2000 were subject to the Taxpayer Relief Act of 1997 which added three new capital gain tax rates to the previous rate structure to form a new, eight-rate tax bracket structure (with maximum statutory tax rate of 39.6 percent). See the

Income and Tax Concepts section of this article for a more detailed description of the capital gain rates.

- 7) Tax Years 2001 through 2009 were affected mainly by two new laws, the Economic Growth and Tax Relief Reconciliation Act of 2001 (EGTRRA) and the Jobs and Growth Tax Relief Reconciliation Act of 2003 (JGTRRA). EGTRRA included a new, 10-percent tax rate bracket, as well as reductions in tax rates for brackets higher than 15 percent of one-half percentage point for 2001 and 1 percentage point for 2002. It also included increases in the child tax credit and an increase in alternative minimum tax exemptions. Tax Year 2003, under JGTRRA, saw additional rate reductions (accelerations of EGTRRA's phased-in

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## Figure A—Continued

### Total Number of Returns, and Selected Income and Tax Items for Taxable Returns, Tax Years 1986–2010—Continued

[Money amounts are in billions of dollars, except where indicated]

Tax year	Total number of returns	Taxable returns						Average per return (whole dollars) [3]			
		Number of returns	As a percentage of total returns [1]	Adjusted gross income (less deficit)	Total income tax	Average tax rate (percent) [2],[3]	Current dollars		Constant dollars [4]		
							Adjusted gross income (less deficit)	Total income tax	Adjusted gross income (less deficit)	Total income tax	
		(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)
Using 1979 Income Concept [5]											
1986	103,045,170	83,967,413	81.5	2,703	367	13.6	32,194	4,374	29,374	3,991	
1987	106,996,270	86,723,796	81.1	2,736	369	13.5	31,551	4,257	27,774	3,747	
1988	109,708,280	87,135,332	79.4	3,011	413	13.7	34,556	4,738	29,210	4,005	
1989	112,135,673	89,178,355	79.5	3,188	433	13.6	35,752	4,855	28,832	3,915	
1990	113,717,138	89,862,434	79.0	3,335	447	13.4	37,108	4,976	28,392	3,807	
1991	114,730,123	88,733,587	77.3	3,387	448	13.2	38,169	5,054	28,024	3,711	
1992	113,604,503	86,731,946	76.3	3,553	476	13.4	40,964	5,491	29,198	3,914	
1993	114,601,819	86,435,367	75.4	3,625	503	13.9	41,938	5,817	29,023	4,026	
1994	115,943,131	87,619,446	75.6	3,796	535	14.1	43,322	6,104	29,232	4,119	
1995	118,218,327	89,252,989	75.5	4,075	588	14.4	45,655	6,593	29,957	4,326	
1996	120,351,208	90,929,350	75.6	4,418	658	14.9	48,582	7,239	30,964	4,614	
1997	122,421,991	93,471,200	76.4	4,849	731	15.1	51,875	7,824	32,321	4,875	
1998	124,770,662	93,047,898	74.6	5,299	789	14.9	56,947	8,475	34,745	5,171	
1999	127,075,145	94,546,080	74.4	5,736	877	15.3	60,666	9,280	36,414	5,570	
2000	129,373,500	96,817,603	74.8	6,294	981	15.6	65,012	10,129	37,754	5,882	
2001	130,255,237	94,763,530	72.8	5,943	888	14.9	62,716	9,370	35,413	5,291	
2002	130,076,443	90,963,896	69.9	5,758	797	13.8	63,297	8,762	35,184	4,870	
2003	130,423,626	88,921,904	68.2	5,849	748	12.8	65,777	8,412	35,749	4,572	
2004	132,226,042	89,101,934	67.4	6,399	832	13.0	71,817	9,337	38,019	4,943	
2005	134,372,678	90,593,081	67.4	7,016	935	13.3	77,448	10,319	39,656	5,284	
2006	[6] 138,394,754	92,740,927	67.0	7,640	1,024	13.4	82,379	11,041	40,863	5,477	
2007	[7] 142,978,806	96,272,958	67.3	8,282	1,116	13.5	86,028	11,588	41,499	5,590	
2008	142,450,569	90,660,104	63.6	7,760	1,032	13.3	85,592	11,379	39,754	5,285	
2009	140,494,127	81,890,189	58.3	6,893	866	12.6	84,168	10,575	39,232	4,929	
2010	142,892,051	84,475,933	59.1	7,435	952	12.8	88,008	11,266	40,360	5,166	

[1] Number of taxable returns (column 2) divided by total number of returns (column 1).

[2] Average tax rate is "total income tax" (column 5) divided by "adjusted gross income less deficit (AGI)" (column 4).

[3] The average adjusted gross income (less deficit), average total income tax, and average tax rate were calculated from unrounded data.

[4] Constant dollars were calculated using the U.S. Bureau of Labor Statistics' consumer price index for urban consumers (CPI-U, 1982-84=100). For 2010, the CPI-U = 218.056.

[5] These statistics are based on adjusted gross income less deficit (AGI) recomputed to reflect the 1979 Income Concept, thus enabling more valid comparisons to be made of the average tax rates among years. Changes in the definition of AGI among years render direct comparison of the unadjusted figures misleading. For additional information, see *Statistics of Income—Individual Income Tax Returns*, for 1986–2010. See Figure G for components of the 1979 Income Concept.

[6] Includes 742,859 Form 1040 EZ-T returns. This form existed for only Tax Year 2006.

[7] The total number of returns does not include the returns filed by individuals only to receive the economic stimulus payment and who had no other reason to file.

reductions) in ordinary marginal tax rates higher than the 15-percent rate, as well as expansions to particular income thresholds in the rates from 15 percent and below. Also, the rate for most long-term capital gains was reduced from 20 percent to 15 percent. Further, qualified dividends were taxed at this same 15-percent rate. These changes are detailed in the previously published article, "Individual Income

Tax Rates and Shares, 2003," in Appendix C (under *Tax Rate Reduction*). Under EGTRRA, beginning in 2006, the complete phase-out of personal exemptions and the limitation on some itemized deductions for upper-income taxpayers were modified to limit the maximum phase-out of two-thirds of both the exemption amount and the itemized deduction limitation amount. For 2008, the limit was changed to

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one-third. Beginning in 2004, the Working Families Tax Relief Act increased the additional child tax credit refundable rate from 10 percent to 15 percent.

8) Beginning in 2009, the American Recovery and Reinvestment Act (ARRA) provided a 2-year making-work-pay refundable tax credit of up to \$400 for working individuals and \$800 for working families. The Act temporarily increased the earned income credit by modifying calculations on qualifying earned income amounts and phase-out ranges. The Act increased eligibility for receiving the refundable portion of the child tax credit for 2009 and 2010 by lowering the earned income floor to receive the credit from \$8,500 to \$3,000. For 2009 and 2010, the Act provided an American opportunity tax credit of up to \$2,500 per student of the cost of tuition and

related expenses. Other selected major individual income tax provisions in the Act include: a temporary refundable first-time homebuyers credit of up to \$8,000, a temporary suspension on Federal income tax on the first \$2,400 of unemployment compensation for 2009, an additional deduction for State sales and excise taxes on the purchase of certain motor vehicles, a \$250 credit for certain government retirees, and an aggregate cap of \$1,500 on residential energy credits for 2009 and 2010.

As shown in Figure B, the average tax rate on all taxable returns as a percentage of AGI was 13.1 percent for 2010. The average tax rate for the AGI-size classes ranged from 2.7 percent for the “\$10,000 under \$20,000” AGI-size class to 24.2 percent for the “\$500,000 under \$1,000,000” AGI-size class.

## Figure B

### Taxable Returns: Number of Returns, Adjusted Gross Income, and Total Income Tax, by Size of Adjusted Gross Income, Tax Years 2009 and 2010

[Number of returns is in thousands--money amounts are in millions of dollars]

Tax year, item	Total	Size of adjusted gross income									
		Under \$1 [1]	\$1 under \$10,000	\$10,000 under \$20,000	\$20,000 under \$30,000	\$30,000 under \$50,000	\$50,000 under \$100,000	\$100,000 under \$200,000	\$200,000 under \$500,000	\$500,000 under \$1,000,000	\$1,000,000 or more
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	
<b>Tax Year 2010:</b>											
Number of taxable returns	84,476	6	2,252	7,917	9,409	18,592	28,151	13,870	3,457	541	279
Adjusted gross income (less deficit)	7,246,202	-6,111	15,652	124,883	234,942	736,100	2,019,556	1,854,118	981,124	366,494	919,445
Total income tax	951,674	250	438	3,433	11,780	47,754	167,026	224,423	192,826	88,590	215,155
Average tax rate (percent) [2]	13.1	[3]	2.8	2.7	5.0	6.5	8.3	12.1	19.7	24.2	23.4
<b>Tax Year 2009:</b>											
Number of taxable returns	81,890	4	2,206	7,752	9,243	17,971	27,436	13,375	3,178	490	235
Adjusted gross income (less deficit)	6,777,685	-5,023	15,225	122,889	231,294	710,745	1,966,323	1,783,386	900,644	330,211	721,990
Total income tax	865,949	85	420	3,364	11,497	45,556	158,455	212,291	176,322	80,458	177,500
Average tax rate (percent) [2]	12.8	[3]	2.8	2.7	5.0	6.4	8.1	11.9	19.6	24.4	24.6
<b>Change in:</b>											
Number of taxable returns	2,586	2	46	165	167	621	715	496	278	52	44
Percent	3.2	57.4	2.1	2.1	1.8	3.5	2.6	3.7	8.8	10.5	18.5
Adjusted gross income (less deficit)	468,517	-1,089	427	1,995	3,648	25,355	53,233	70,731	80,480	36,283	197,456
Percent	6.9	21.7	2.8	1.6	1.6	3.6	2.7	4.0	8.9	11.0	27.3
Total income tax	85,725	165	18	68	283	2,197	8,571	12,132	16,504	8,132	37,655
Percent	9.9	193.4	4.2	2.0	2.5	4.8	5.4	5.7	9.4	10.1	21.2
<b>Average tax rate:</b>											
Percentage point change	0.4	[4]	[5]	[5]	[5]	0.1	0.2	0.2	0.1	-0.2	-1.2

[1] Includes returns with adjusted gross deficit. Tax in these returns represents some combination of alternative minimum tax, Form 4972 tax on lump-sum distributions from qualified retirement plans, and Form 8814 tax on a child's interest and dividends not reflected in adjusted gross income or taxable income.

[2] Average tax rate is “total income tax” as a percentage of adjusted gross income less deficit (AGI). The average tax rate was calculated from unrounded data.

[3] Percentage not computed.

[4] Change not computed.

[5] Less than 0.05 percent.

NOTE: Detail may not add to totals because of rounding.

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The average tax rate of 13.1 percent for 2010 for all taxable income classes combined was 0.4 percentage points higher than in 2009. The average tax rate for taxable returns in all AGI classes under \$500,000 went up slightly for 2010 but decreased in the “\$1,000,000 or more” class by 1.2 percentage points.

Figure B2 shows all tax returns, adjusted gross income, total income tax minus refundable credits (including credits used to offset other taxes), and the average tax rate including the effects from these refundable credits. For 2010, the average tax rate minus refundable credits for all 142.9 million returns (and, thus, including returns with no income tax or negative income tax) was 10.4 percent. This was up 0.5 percentage points from 2009, when this rate for all returns was 9.9 percent. During the same period, AGI for all returns rose by 6.1

percent. Total income tax minus refundable credits rose 11.4 percent for 2010.

In order to analyze the average tax rate over time, it is necessary to use a more consistent measure of income than AGI because some tax law changes have resulted in the definition of AGI changing from year to year. The 1979 Income Concept controls for much of this variation in tax law, and its use provides a more consistent estimate of the average tax rate across years. Under the 1979 Concept, the average tax rate for 2010 increased to 12.8 percent from 12.6 percent for the previous year. Using the 1979 Income Concept, total income on taxable returns increased 7.9 percent to \$7.44 trillion for 2010. Total income tax increased by almost \$86 billion (9.9 percent) to \$952 billion for 2010. Average AGI for taxable returns increased to \$85,778 for 2010, a 3.6-percent

## Figure B2

### All Returns: Number of Returns, Adjusted Gross Income, and Total Income Tax Minus Refundable Credits [1], by Size of Adjusted Gross Income, Tax Years 2009 and 2010

[Number of returns is in thousands—money amounts are in millions of dollars]

Tax year, item	Total	Size of adjusted gross income									
		Under \$1 [2]	\$1 under \$10,000	\$10,000 under \$20,000	\$20,000 under \$30,000	\$30,000 under \$50,000	\$50,000 under \$100,000	\$100,000 under \$200,000	\$200,000 under \$500,000	\$500,000 under \$1,000,000	\$1,000,000 or more
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	
<b>Tax Year 2010:</b>											
Number of returns	142,892	2,554	22,241	24,529	19,135	25,605	30,533	13,998	3,472	544	280
Adjusted gross income (less deficit)	8,089,142	-188,804	119,109	364,682	473,852	1,000,098	2,171,323	1,869,639	985,431	368,354	925,458
Total income tax minus refundable credits [3]	838,887	-834	-16,152	-41,948	-17,390	31,338	163,172	224,187	192,784	88,586	215,143
Average tax rate (percent) [4]	10.4	[5]	-13.6	-11.5	-3.7	3.1	7.5	12.0	19.6	24.0	23.2
<b>Tax Year 2009:</b>											
Number of returns	140,494	2,512	22,668	23,845	18,696	25,168	30,159	13,522	3,195	493	237
Adjusted gross income (less deficit)	7,626,431	-198,958	119,626	354,483	463,162	982,969	2,139,407	1,801,447	905,347	332,037	726,911
Total income tax minus refundable credits [3]	752,805	-1,179	-15,904	-39,945	-17,277	28,192	153,579	211,315	176,143	80,419	177,463
Average tax rate (percent) [4]	9.9	[5]	-13.3	-11.3	-3.7	2.9	7.2	11.7	19.5	24.2	24.4
<b>Change in:</b>											
Number of returns	2,398	42	-427	684	439	437	374	476	277	52	43
Percent	1.7	1.7	-1.9	2.9	2.3	1.7	1.2	3.5	8.7	10.5	18.4
Adjusted gross income (less deficit)	462,711	10,154	-516	10,199	10,690	17,130	31,917	68,192	80,083	36,316	198,547
Percent	6.1	5.1	-0.4	2.9	2.3	1.7	1.5	3.8	8.8	10.9	27.3
Total income tax minus refundable credits	86,081	345	-249	-2,003	-113	3,146	9,593	12,873	16,641	8,167	37,680
Percent	11.4	-29.2	1.6	5.0	0.7	11.2	6.2	6.1	9.4	10.2	21.2
Average tax rate:											
Percentage point change	0.5	[6]	-0.3	-0.2	0.1	0.3	0.3	0.3	0.1	-0.2	-1.2

[1] Refundable credits include the parts used to offset other taxes.

[2] Includes returns with adjusted gross deficit. Tax in these returns represents some combination of alternative minimum tax, Form 4972 tax on lump-sum distributions from qualified retirement plans, and Form 8814 tax on a child's interest and dividends not reflected in adjusted gross income or taxable income.

[3] For Tax Year 2009, the refundable credits included the earned income credit, additional child tax credit, making-work-pay credit, American opportunity credit, first-time homebuyer credit, and the prior-year minimum tax credit. For Tax Year 2010, the refundable credits included the earned income credit, additional child tax credit, making-work-pay credit, American opportunity credit, first-time homebuyer credit, prior-year minimum tax credit, and the adoption credit.

[4] Average tax rate is “total income tax minus refundable credits” as a percentage of adjusted gross income less deficit (AGI). The average tax rate was calculated from unrounded data.

[5] Percentage not computed.

[6] Change not computed.

NOTE: Detail may not add to totals because of rounding.

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increase from 2009. For 2010 average income tax also increased by 6.5 percent to \$11,266.

## Marginal Tax Rate Classifications

A return's marginal tax rate is the highest statutory tax rate bracket applicable to that tax return. Marginal tax rate statistics are presented in Figure C and Table 1.<sup>4</sup> These statistics are based on all individual income tax returns, as well as returns that show a positive taxable income amount based on "tax generated" (see the Explanation of Selected Terms section of this article) and items of income that were subject to the regular income tax, generally those included in AGI.<sup>5</sup> The Income and Tax Concepts section of this article explains the determination of the marginal tax rate bracket into which a return is assumed to fall. Table 2 contains additional

data based on ordinary tax rates and presents statistics on the income and tax generated at each ordinary tax rate by size of AGI.

For 2010, the number of returns with modified taxable income increased to 107.3 million returns, up by 3.0 percent from the 2009 total of 104.2 million.<sup>6</sup> (See the Income and Tax Concepts section for an explanation of modified taxable income.) The amount of modified taxable income reported on these returns increased 8.1 percent to \$5.50 trillion. The tax generated on these returns increased by 8.8 percent to \$1.04 trillion. Figure C presents the amounts and percentages of modified taxable income and income tax generated (before alternative minimum tax and reduction by tax credits, including the earned income credit) by the marginal tax rate categories (defined in the Income and Tax Concepts section of this article).

## Figure C

### All Returns: Tax Generated at All Rates on Returns with the Indicated Marginal Tax Rate [1], Tax Year 2010

[Money amounts are in thousands of dollars]

Marginal tax rate classes	Number of returns		Modified taxable income		Tax generated	
	Number	Percent of total	Amount	Percent of total	Amount	Percent of total
	(1)	(2)	(3)	(4)	(5)	(6)
<b>All tax rates</b>	<b>142,892,051</b>	<b>100.0</b>	<b>5,503,672,955</b>	<b>100.0</b>	<b>1,037,745,104</b>	<b>100.0</b>
0 percent	35,576,128	24.9	0	0	0	0
0 percent (capital gains)	714,668	0.5	5,946,398	0.1	0	0
10 percent	27,431,153	19.2	154,311,877	2.8	14,783,424	1.4
10 percent (Form 8814) [3]	22,081	[2]	15,386	[2]	1,536	[2]
15 percent	42,321,591	29.6	1,200,490,826	21.8	154,333,195	14.9
15 percent (capital gains) [4]	7,313,386	5.1	412,282,731	7.5	52,313,544	5.0
25 percent	22,711,738	15.9	1,667,563,361	30.3	282,287,760	27.2
25 percent (capital gains)	110,478	0.1	19,170,269	0.3	3,259,589	0.3
28 percent	4,072,068	2.8	605,313,659	11.0	127,493,441	12.3
28 percent (capital gains)	14,415	[2]	3,634,591	0.1	701,712	0.1
33 percent	1,559,174	1.1	430,265,228	7.8	105,116,478	10.1
35 percent	854,212	0.6	1,002,129,828	18.2	296,922,721	28.6
Form 8615 [5]	190,960	0.1	2,548,801	[2]	531,704	0.1

[1] For an explanation of marginal tax rate, see Income and Tax Concepts section as well as footnote 4 of this article.

[2] Less than 0.05 percent.

[3] Form 8814 was filed for a dependent child, meeting certain age requirements, for whom the parents made an election to report the child's investment income on the parents' tax return. This rate classification is comprised of those returns with a tax liability only from the dependent's income.

[4] The 15-percent capital gain rate also includes qualified dividends.

[5] Form 8615 was filed for a child meeting certain age requirements, to report the child's investment income. The returns in this rate classification are not distributed by tax rate.

NOTE: Detail may not add to totals because of rounding.

<sup>4</sup> Marginal tax rate as cited in this article is the highest statutory rate on taxable income. It includes ordinary tax rates and capital gains tax rates. This concept does not include the effects of AMT or tax credits.

<sup>5</sup> Tax generated does not include certain other taxes reported on the individual income tax return, such as self-employment tax (the Social Security and Medicare tax on income from self-employment), the Social Security tax on certain tip income, household employment taxes, tax from the recapture of prior-year investment, low-income housing, or other credits, penalty tax applicable to early withdrawals from an individual retirement arrangement (IRA) or other qualified retirement plans, and tax on trusts, accumulation, and distributions. The statistics for "total tax liability," shown in Bryan, Justin, "Individual Income Tax Returns: 2010," *Statistics of Income Bulletin*, Fall 2012, Volume 32, Number 2, include these taxes.

<sup>6</sup> Nontaxable (i.e., tax-exempt) forms of income, such as interest on State and local government obligations, were not included in AGI and generally did not affect the marginal tax rate. However, in some situations the receipt of some forms of tax-exempt income, such as tax-exempt interest, could have influenced the taxability of other income, in particular Social Security benefits. When this situation occurred, the income made taxable by the receipt of other forms of nontaxable income was included in AGI.

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Returns with modified taxable income in the “15-percent” (ordinary income) marginal tax rate bracket contained the largest share of returns for 2010, at 29.6 percent. These returns reported 21.8 percent of modified taxable income for 2010 and generated 14.9 percent of income tax (before credits and excluding the AMT). Conversely, taxpayers in the “35-percent” (ordinary income) marginal rate, the least represented (ordinary income) bracket, accounted for only 0.6 percent of returns but reported 18.2 percent of the modified taxable income and 28.6 percent of the tax generated (the largest of any tax bracket). The “0-percent” (ordinary income) marginal rate bracket had the second largest share of returns at 24.9 percent. These returns had no modified taxable income and consequently generated zero tax dollars. The “10-percent” (ordinary income) marginal rate bracket reported the third largest share of returns at 19.2 percent. However, such returns accounted for only 2.8 percent of modified income and 1.4 percent of income tax generated. With a 15.9-percent share of returns, the “25-percent” (ordinary income) marginal rate bracket reported the largest percentage (30.3) of total modified taxable income and second highest percent of income tax generated (27.2). Returns in the “28-percent” (ordinary income) marginal rate bracket represented only 2.8 percent of the total share of returns and accounted for 11.0 percent of the modified taxable income and 12.3 percent of generated income tax. Returns in the “33-percent” (ordinary income) marginal rate bracket represented the second smallest share of ordinary tax rate returns at 1.1 percent, and accounted for 7.8 percent of the modified taxable income and 10.1 percent of the tax generated. Returns in the capital gain and dividends 0-percent, 15-percent, 25-percent, and 28-percent tax brackets represented 5.7 percent of returns and reported a total of 8.0 percent of modified taxable income and 5.4 percent of the tax.

As shown in Table 2, the tax generated (regular tax before credits) for 2010 at the 15-percent rate was more than any other rate. The 36.4 percent of income taxed at this rate was reported by 73.4 percent of returns with modified taxable income, producing 28.9 percent of tax generated. The 25-percent (ordinary income rate) generated the next largest amount of income tax. Tax in that bracket was reported on 27.3 percent of returns, with

15.9 percent of all modified taxable income taxed at this rate, generating 21.0 percent of the tax generated. The 35-percent rate had the third largest amount of tax generated. Tax in that bracket was reported on only 0.8 percent of returns. However, 9.8 percent of all modified taxable income was taxed at this rate, generating 18.2 percent of tax generated.

## Components of Total Income Tax

### Regular Tax

Regular tax is generally tax determined from a taxpayer's taxable income based on statutory tax rates. It does not include the alternative minimum tax (AMT) nor does it exclude allowable tax credits. Figure D illustrates the derivation of the aggregate tax generated for 2009 and 2010 returns. Table 1 includes two tax amounts: “tax generated” and “income tax after credits.” Tables 5 through 8 and Figures A and B include an additional measure of tax, “total income tax,” which also includes distributed tax on trust accumulations, while Figure B2 includes total income tax minus refundable credits.

As shown in Figure D and column 5 of Table 1, the tax generated by applying statutory ordinary income and capital gain tax rates to modified taxable income was \$1.04 trillion, an 8.8-percent increase from 2009.<sup>7</sup> For most taxpayers, tax generated was equal to income tax before credits. However, for some taxpayers (see Alternative Minimum Tax section of this article for explanation), income tax before credits included the alternative minimum tax (AMT) and/or special taxes on lump-sum distributions from qualified retirement plans (when a 10-year averaging method was used).<sup>8</sup> The AMT increased 21.6 percent to \$27.5 billion for 2010. Income tax before credits was \$1.07 trillion for 2010, up from \$976.0 billion, representing a 9.1-percent increase from 2009. Taxpayers used \$113.6 billion of tax credits to reduce their income tax before credits. The earned income credit (EIC) is included in this computation to the extent that its application did not reduce income tax before credits below zero. Any portion of the EIC that is refundable to the taxpayer because it exceeds the taxpayer's liability and any portion of the EIC used to reduce taxes other than income taxes are excluded from the computation of income tax after credits.<sup>9</sup> Both

<sup>7</sup> The 2009 data are from Mudry, Kyle, “Individual Income Tax Rates and Shares, 2009,” *Statistics of Income Bulletin*, Winter 2012, Volume 31, Number 3, p. 19–68.

<sup>8</sup> The income amounts on which these special computations for lump-sum distributions were based were not reflected in current-year AGI or current-year taxable income.

<sup>9</sup> For 2010, the total earned income credit was \$59.6 billion. This amount includes the amount used to reduce the income tax (\$0.45 billion), the amount used to reduce other taxes reported on individual income tax returns (\$4.9 billion), and the amount refunded to taxpayers (\$54.3 billion). Table 4 in Bryan, Justin, “Individual Income Tax Returns, 2010,” *Statistics of Income Bulletin*, Fall 2012, Volume 32, Number 2, shows these amounts.

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## Figure D

### Derivation of Tax Years 2009 and 2010 Total Income Tax as Shown in Statistics of Income

[Money amounts are in billions of dollars]

Item	2009	2010	Percentage change
	(1)	(2)	(3)
<b>Tax generated from tax rate schedules or tax table</b>	<b>953.4</b>	<b>1,037.8</b>	<b>8.8</b>
PLUS:			
Tax on lump-sum distributions from qualified retirement plans	[1]	[1]	[2]
Alternative minimum tax	22.6	27.5	21.6
EQUALS:			
<b>Income tax before credits</b>	<b>976.0</b>	<b>1,065.3</b>	<b>9.1</b>
LESS: Tax credits, total [3]	110.1	113.6	3.2
Child-care credit	3.3	3.4	2.4
Child tax credit [3]	28.4	28.5	0.3
Nonrefundable education credit	10.8	12.3	13.2
Foreign tax credit	13.1	15.2	16.6
General business credit	1.6	2.2	35.4
Earned income credit (limited to the amount needed to reduce total income tax to zero)	0.5	0.5	-7.9
Credit for prior-year minimum tax	0.3	0.7	128.0
Retirement savings contribution credit	1.0	1.0	-1.0
Other credits [4]	51.0	49.9	-2.3
EQUALS:			
<b>Income tax after credits</b>	<b>865.9</b>	<b>951.7</b>	<b>9.9</b>
PLUS: Trusts accumulation distribution (Form 4970)	[1]	[1]	[2]
EQUALS:			
<b>Total income tax</b>	<b>865.9</b>	<b>951.7</b>	<b>9.9</b>
LESS: Refundable credits [5]	113.1	112.8	-0.3
<b>Total income tax minus refundable credits [5]</b>	<b>752.8</b>	<b>838.9</b>	<b>11.4</b>

[1] Less than \$0.05 billion.

[2] Percentage not computed.

[3] Does not include the additional child tax credit that for 2010 was \$27.8 billion, which was refunded to taxpayers and not included in total income tax.

[4] Includes credits listed separately in Table 2 of Individual Income Tax Returns, 2010, *Statistics of Income Bulletin*, Fall 2012, Volume 32, Number 2.

[5] Includes credits used to offset other taxes.

NOTE: Detail may not add to totals because of rounding.

income tax after credits (Figure D) and total income tax (the sum of income tax after credits and tax on trust accumulation distributions) totaled \$951.7 billion. These taxes both represented a 9.9-percent increase from 2009. Including refundable credits totaling \$112.8 billion for 2010, income tax minus refundable credits was \$838.9 billion, an 11.4-percent increase from 2009.

For returns with modified taxable income, Table 4a shows estimates of income tax before credits by type of tax computation. It compares the amount of tax before credits assuming that all taxable income is subject to regular tax rates with the amount of tax before credits actually computed after reflecting both regular tax rates and any special tax computations that the taxpayer is either permitted or required to make. In particular, qualified dividends and long-term capital gains are generally

subject to lower tax rates, and certain dependent tax filers are required to compute their tax as if their income were the marginal income of their parents or guardian.<sup>10</sup> The capital gains computations generally reduce taxes; the special provision for certain dependent filers can only increase taxes.

For 2010, 86.5 million returns had their tax before credits computed using only regular income tax rates, compared with 83.9 million for 2009 that used only regular tax computations, an increase of 3.1 percent. The top portion of Table 4a shows the data for these returns. Since these returns did not use any special tax computations, the difference due to special computation (shown in columns 4 and 8) is zero.

As shown in the bottom section of Table 4a, for 2010, 20.6 million returns had their tax liability decreased by

<sup>10</sup> Dependents with income over \$1,900 other than earned income could file their own returns but were required to calculate their tax on other than earned income in excess of \$1,900, as if it were their parent's or guardian's marginal income. Form 8615 was used to compute the higher tax. For dependents with only modest amounts of investment income, the parent or guardian could elect to include the dependent's income on the parent's tax return and fill out Form 8814 for the dependent's income, relieving the dependent of having to file his or her own tax return.

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Schedule D (capital gains) and dividend tax computations. This was an increase of 2.5 percent from the 20.1 million returns in 2009. Taxpayers filing these tax returns paid \$74.2 billion less in tax before credits (column 8) than they would have paid if they had not received the benefits of the lower tax rates for qualified dividends and capital gains. This was up from the \$48.9 billion in savings for 2009 from using these special tax rates. For these taxpayers, the average tax savings increased from \$2,433 for 2009 to \$3,602 for 2010.

As shown in the middle section of Table 4a, for 2010, the number of tax returns filed by dependents under age 18 (or under 24 for full-time students) with Form 8615 for reporting investment income greater than \$1,900 was 0.2 million, representing an increase of 15.7 percent from 2009. Form 8615 was used to compute the dependents' tax as if the dependents' income was the marginal income of the parent or guardian. This mandatory calculation can result in no change or an increase in tax before credits; it cannot lower the dependent's tax before credits. Thus, for Form 8615 filers, the difference in tax before credits due to special computations (column 8) reflects the combination of the lower tax from use of the special tax rates for dividends and capital gains and the possibly higher tax from the required Form 8615 tax computation. The combination of the two offsetting provisions increased taxes by \$3.1 million for 2010. As shown in Table 4b, the net tax reduction was due to a tax reduction of \$123.4 million from use of dividend and capital gains, and a tax increase of \$126.5 million from the Form 8615 tax computation.

## Alternative Minimum Tax

The Revenue Act of 1978 established the alternative minimum tax (AMT) to ensure that a minimum amount of income tax was paid by taxpayers who might otherwise be able to legally reduce, or totally eliminate, their tax burdens. The AMT provisions may recapture some of the tax reductions under the ordinary income tax. Form 6251, *Alternative Minimum Tax—Individuals*, is used to calculate AMT. (See the Computation of Alternative Minimum Taxable Income section of this article for an explanation of the computation of income for AMT purposes.)

Figure E presents statistics, by size of AGI, on the AMT reported by taxpayers filing Form 6251 with their returns. Some taxpayers included, or were required to include, Form 6251, even though their tax liability

was not increased due to the AMT. The tabulations in Figure E include such forms. For 2010, AMT liability increased 21.6 percent to \$27.5 billion from \$22.6 billion in 2009. The number of returns that were subject to paying the AMT increased by 0.2 million for the period.<sup>11</sup> Alternative minimum taxable income (AMTI) for all returns filing a Form 6251 increased 14.9 percent to \$2.1 trillion from 2009.

Figure F shows the number of taxpayers with AMT liability and the amount of that liability for each of the years 1986 through 2010. Much of the variation in the number of taxpayers affected by the AMT and in the amount of AMT liability during the mid-to-late 1980s and early 1990s was attributable to tax law changes such as TRA86, the Revenue Reconciliation Act of 1990 (RRA90), and the Omnibus Budget Reconciliation Act of 1993 (OBRA93), each of which altered the AMT. Since then, the impact of the AMT has increased partially because the AMT exemptions have not been automatically indexed annually for the effects of inflation, whereas various parameters of the ordinary income tax (such as tax brackets, exemptions, etc.) have been indexed annually for inflation. In both EGTRRA in 2001 and JGTRRA in 2003, AMT exemptions were increased, while ordinary tax rates declined. For 2010, AMT levels increased to \$27.5 billion, the highest amount of AMT ever. Since 2001, the number of returns paying AMT has more than tripled from 1.1 million to 4.0 million for 2010.

## Income and Tax Shares

Historical statistics from 2001 through 2010 on income and tax by cumulative percentiles (based on numbers of returns with positive AGI) are presented in Tables 5 through 8. Distributions of AGI, as defined for each year, and tax or income item, by descending and ascending cumulative percentiles of returns, are presented in Tables 5 and 6. These tables can be used to make comparisons across cumulative percentile classes within each year, for tax years beginning in 2001.

Tables 5 and 7 are based on percentiles of returns cumulated downward from the highest income returns. The data in Tables 5 and 7 are shown for the top 0.1 percent (Table 5 only), 1 percent, 5 percent, 10 percent, 25 percent, and 50 percent of returns. Tables 6 and 8 are based on returns cumulated upward from the lowest income returns. Data are shown for the bottom 50 percent, 75 percent, 90 percent, 95 percent, and 99 percent of all returns.

<sup>11</sup> Other tax returns may not have had AMT liability but the size of their tax credits, for example their general business credits, may have been reduced because of the AMT.

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## Figure E

### Returns with Alternative Minimum Tax Computation Reported on Form 6251: Total Adjustments and Preferences, and Alternative Minimum Taxable Income and Tax, by Size of Adjusted Gross Income, Tax Years 2009 and 2010

[Money amounts are in thousands of dollars]

Size of adjusted gross income	Total AMT adjustments and preferences [1]		Alternative minimum taxable income [1]		Alternative minimum tax	
	Number of returns	Amount	Number of returns	Amount	Number of returns	Amount
	(1)	(2)	(3)	(4)	(5)	(6)
Tax Year 2010						
<b>All returns</b>	<b>7,980,987</b>	<b>196,939,811</b>	<b>9,335,559</b>	<b>2,052,491,556</b>	<b>4,019,538</b>	<b>27,460,515</b>
Under \$1 [2]	138,092	3,364,529	182,195	-24,933,124	6,011	266,930
\$1 under \$10,000	144,963	335,393	382,952	1,280,847	1,381	2,741
\$10,000 under \$20,000	214,106	572,325	435,056	5,455,819	8,763	14,369
\$20,000 under \$30,000	228,929	1,141,564	397,148	8,103,215	1,938	9,618
\$30,000 under \$40,000	234,278	963,452	358,134	10,371,591	3,472	9,495
\$40,000 under \$50,000	254,806	1,373,007	354,263	13,753,599	2,577	11,315
\$50,000 under \$75,000	702,669	5,525,474	886,529	48,216,152	55,570	69,283
\$75,000 under \$100,000	738,618	7,152,971	839,156	64,293,847	100,290	139,466
\$100,000 under \$200,000	1,952,997	33,455,082	2,064,208	272,214,245	808,457	1,727,242
\$200,000 under \$500,000	2,756,453	71,771,808	2,813,653	763,200,242	2,589,820	15,860,647
\$500,000 under \$1,000,000	437,213	25,421,333	442,583	273,162,808	360,424	4,886,395
\$1,000,000 or more	177,862	45,862,873	179,681	617,372,317	80,833	4,463,011
Tax Year 2009						
<b>All returns</b>	<b>7,831,587</b>	<b>190,503,405</b>	<b>9,194,021</b>	<b>1,785,583,531</b>	<b>3,827,562</b>	<b>22,579,779</b>
Under \$1 [2]	161,005	3,834,616	215,990	-38,937,490	5,556	104,438
\$1 under \$10,000	171,195	531,740	456,430	1,336,522	283	3,991
\$10,000 under \$20,000	217,953	711,542	417,676	4,880,586	10,405	5,167
\$20,000 under \$30,000	236,829	1,029,999	407,312	7,890,142	8,039	11,276
\$30,000 under \$40,000	237,923	1,265,847	360,971	10,710,287	4,249	15,407
\$40,000 under \$50,000	241,673	1,293,867	338,763	13,219,477	3,981	7,702
\$50,000 under \$75,000	720,574	5,527,911	904,489	48,536,715	70,450	66,741
\$75,000 under \$100,000	721,588	7,896,504	813,859	61,880,808	99,872	148,679
\$100,000 under \$200,000	2,052,811	36,830,027	2,150,188	281,595,125	895,075	1,906,814
\$200,000 under \$500,000	2,544,187	68,192,193	2,594,969	695,219,809	2,385,452	13,349,664
\$500,000 under \$1,000,000	380,627	22,746,161	386,226	235,164,173	292,146	3,658,092
\$1,000,000 or more	145,224	40,642,997	147,150	464,087,379	52,053	3,301,807

[1] See Figures I and J for the calculation of alternative minimum taxable income and the list of alternative minimum tax adjustments and preferences.

[2] Includes returns with adjusted gross deficit.

NOTE: Detail may not add to totals because of rounding.

Consider, for example, the data in Table 5 for the 135 million nondependent returns filed for 2010.<sup>12</sup> The average tax rate for these returns was 11.8 percent, a 0.4-percentage point increase from 2009. (A sizeable portion of returns are nontaxable, accounting for the difference in the computation of this particular average tax rate versus the 13.1-percent average tax rate for taxable returns only, shown in Figure A.) As expected for a graduated income tax system, the top 1 percent, 5 percent, 10 percent, 25 percent, and 50 percent all recorded a larger share of the

income tax burden than their respective shares of AGI. For 2010, the returns in the top 0.1 percent reported 9.2 percent of total AGI and 17.9 percent of total income tax. The amount of AGI needed for inclusion in this percentile group (i.e., the AGI floor) was \$1,634,386. For 2009, the returns in this percentile group (i.e., those with at least \$1,469,393 in AGI) reported 7.9 percent of total AGI and 16.9 percent of total income tax.

For 2010, the returns in the top 1 percent reported 18.9 percent of total AGI and 37.4 percent of income tax.

<sup>12</sup> The percentile groupings of tax filers exclude returns filed by dependents.

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## Figure F

### Alternative Minimum Tax, Tax Years 1986–2010

[Tax rates are in percentages—money amounts are in thousands of dollars]

Tax year	Highest statutory alternative minimum tax rate	Alternative minimum tax	
		Number of returns	Amount
	(1)	(2)	(3)
1986	20	608,907	6,713,149
1987	21	139,779	1,674,898
1988	21	113,562	1,027,884
1989	21	117,483	831,012
1990	21	132,103	830,313
1991	24	243,672	1,213,426
1992	24	287,183	1,357,063
1993	28	334,615	2,052,790
1994	28	368,964	2,212,094
1995	28	414,106	2,290,576
1996	28	477,898	2,812,746
1997	28 [1]	618,072	4,005,101
1998	28 [1]	853,433	5,014,549
1999	28 [1]	1,018,063	6,477,697
2000	28 [1]	1,304,197	9,600,840
2001	28 [1]	1,120,047	6,756,705
2002	28 [1]	1,910,789	6,853,901
2003	28 [1]	2,357,975	9,469,803
2004	28 [1]	3,096,299	13,029,239
2005	28 [1]	4,004,756	17,421,071
2006	28 [1]	3,966,540	21,564,586
2007	28 [1]	4,108,964	24,109,512
2008	28 [1]	3,935,248	25,649,084
2009	28 [1]	3,827,562	22,579,779
2010	28 [1]	4,019,538	27,460,515

[1] For 1997–2002, the top rate on most long-term capital gains was 20 percent. For 2003–2010, the top rate was 15 percent.

The amount of AGI needed for inclusion in this percentile group (i.e., the AGI floor) was \$369,691. For 2009, the returns in this percentile group (i.e., those with at least \$351,968 in AGI) reported 17.2 percent of total AGI and 36.3 percent of total income tax.

For 2010, the returns in the top 5-percent group (returns reporting AGI of \$161,579 or more) reported 33.8 percent of total AGI and 59.1 percent of income tax, compared to 32.2 percent and 58.2 percent, respectively, for 2009 (when the AGI floor was \$157,342). For 2010, returns in the top 10-percent group (returns with AGI of at least \$116,623) reported 45.2 percent of AGI and paid 70.6 percent of income tax. For 2009, the returns in this percentile group (with AGI of \$114,181 or more) reported 43.8 percent of total AGI and 69.9 percent of income tax. The top 50-percent group (reporting AGI of \$34,388 or more) accounted for 88.3 percent of AGI and paid almost all (97.6 percent) of the income tax for 2010.

## Explanation of Selected Terms

This section provides brief explanations of the major tax concepts discussed in this article. For more extensive definitions, see *Statistics of Income—2010, Individual Income Tax Returns 2010*, Internal Revenue Service, Publication 1304.

**Adjusted gross income**—Adjusted gross income is “total income,” as defined by the Internal Revenue Code, less “statutory adjustments” (primarily business, investment, or certain other deductions, such as payments to a Keogh self-employed retirement plan, certain deductible contributions to an individual retirement arrangement (IRA), self-employed health insurance deductions, and one-half of Social Security taxes for the self-employed). Total income includes, for example, salaries and wages, taxable interest, dividends, alimony, and net amounts from such sources as business income, rents and royalties, and sales of capital assets.

**Difference due to special tax computation**—For this article, the tax difference is the amount of tax resulting from using provisions of one of the special tax computations (Form 8615 or Schedule D and qualified dividends) less the amount of tax that would have resulted from not having used any of these provisions (regular tax computation).

**Dividends**—Ordinary dividend income consisted of distributions of money, stock, or other property received by taxpayers from domestic and foreign corporations, either directly or passed through estates, trusts, partnerships, or regulated investment companies. Ordinary dividends also included distributions from money market mutual funds.

Ordinary dividends did not include nontaxable distributions of stock or stock rights, returns of capital, capital gains, or liquidation distributions. Taxpayers were also instructed to exclude amounts paid on deposits or withdrawable accounts in banks, mutual savings banks, cooperative banks, savings and loan associations, and credit unions, which were treated as interest income.

**Qualified dividends** are the ordinary dividends received in tax years beginning after 2002 that met certain conditions. These conditions include: the dividend must have been paid by a U.S. corporation or a “qualified” foreign corporation; the stock ownership must have met certain holding period requirements; the dividends were not from certain institutions, such as mutual savings banks, cooperative banks, credit unions, tax-exempt organizations, or farmer cooperatives; and the dividends were not for any share of stock which was part of an employee stock ownership plan (ESOP). The maximum tax rate for qualified dividends was 15 percent generally (or 0 percent

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for amounts that would otherwise have been taxed at the 10-percent or 15-percent regular income rates).

*Form 8615 tax computation*—Form 8615, in addition to being used to figure the tax of certain children who are under 18, was required to figure the tax for a child with investment income of more than \$1,900 if the child:

- 1) Was age 18 at the end of 2010 and did not have earned income that was more than half of the child's support, or
- 2) Was a full-time student over age 18 and under age 24 at the end of 2010 and did not have earned income that was more than half of the child's support.

*Income tax before credits*—This amount consisted of the tax liability on taxable income, computed by using the tax tables, tax rate schedules, Schedule D tax worksheet, foreign-earned income tax worksheet, Schedule J, or Form 8615, plus Form (s) 8814, any additional taxes from Form 4972, and the alternative minimum tax.

*Income tax before credits (regular tax computation)*—This amount consisted of the tax liability on ordinary income, computed by using the tax table or applying the rates from one of the four tax rate schedules, plus any additional tax (tax on lump-sum distributions from qualified retirement plans). When Form 8615 tax was payable on investment income of children, for this concept, all the income was taxed at the child's rate rather than at the rate of the parents. When the Schedule D tax was payable on net long-term capital gains, the tax was based on the regular tax rates rather than the 0-percent, 15-percent, 25-percent, or 28-percent tax rate for capital gains. When a tax was payable on a qualified dividend, the tax was based on regular tax rates instead of the maximum tax rate for qualified dividends, 15 percent (0 percent for amounts that would otherwise have been taxed in the 10-percent tax bracket). This is in contrast to the computation of income tax before credits (see above) in which special tax computations such as those involved on Form 8615, Schedule D, and qualified dividends are taken into account. See Table 4.

*Income tax after credits*—To arrive at income tax after credits, taxpayers deducted total credits from income tax before credits. For the statistics, tax was further reduced by the portion of the earned income credit, first-time homebuyer credit, making-work-pay credit, refundable education credit, refundable prior-year minimum tax credit and the recovery rebate credit which did not result in a negative tax. Any tax remaining after subtraction of all credits, and the credits mentioned

above, was tabulated as income tax after credits. This is limited to zero.

*Income tax minus refundable credits*—This amount consisted of income tax after credits from the Form 1040, less the Form 4970 tax, less the refundable credits including those used to offset other taxes. For Tax Year 2010, refundable credits included the earned income credit, additional child tax credit, adoption credit, making-work-pay credit, refundable education credit, first-time homebuyer credit, and the (refundable) prior-year minimum tax credit. This concept allows income tax to be negative if the refundable credit amounts exceed the income tax amount owed.

*Marginal tax rate*—See Income and Tax Concepts section.

*Modified taxable income*—See Income and Tax Concepts section.

*Regular tax computation*—Depending on marital status and size of taxable income, the taxpayer used one of the four tax rate schedules (or an approximation from the tax table) to determine tax. Returns of taxpayers who had taxes computed by the Internal Revenue Service were classified under the regular tax computation method.

*Schedule D and qualified dividend tax computation*—Schedule D was used to compute the 0-percent, 15-percent, 25-percent, and 28-percent taxes on net long-term capital gains (in excess of net short-term capital losses) if such computations were beneficial to the taxpayer. Any investment interest allocated from long-term capital gains to net investment income for the investment interest expense deduction (on Form 4952) was excluded from this computation. Qualified dividends were taxed at a maximum tax rate of 15 percent (0 percent for amounts that would otherwise have been taxed in the 10 or 15-percent bracket).

*Taxable income*—Taxable income is AGI less the sum of personal exemption amounts and either the standard deduction for nonitemizers or total itemized deductions.

*Taxable returns*—A return is classified as “taxable” based on the presence of “total income tax.” The following additional taxes were not taken into account for this purpose: self-employment; household employment; Social Security; Railroad Retirement Tax Act (RRTA) taxes; tax from recomputing prior-year investment; low-income housing and a few other business credits; penalty taxes on individual retirement arrangements; section 72 penalty taxes; advance earned income credit payments; or “golden parachute” payments (made to key employees as compensation under certain circumstances).

*Tax generated*—This is the amount of tax computed on modified taxable income either from the tax rate

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schedules or the tax table. Tax generated does not take into account the alternative minimum tax or the effect of tax credits. For most returns (those without the special tax on lump-sum distributions from qualified retirement plans or alternative minimum tax), tax generated equals “income tax before credits.”

**Total income tax**—This is the sum of income tax after credits and tax on accumulated trust distribution from Form 4970, less the portion of EIC used to offset other taxes as well as the refundable portion of EIC less the amount used to offset other taxes and the refundable portion of various other credits (including the making-work-pay and government retiree credits, refundable education credit, first-time homebuyer credit, and refundable prior-year minimum tax credit (with tax limited to zero)).

## Income Tax Structure

Taxpayers must file an income tax return if they meet certain minimum filing requirements. The filing requirements for 2010 were generally based on the amount of “gross income,” filing status, age, dependency, and blindness.<sup>13</sup> Generally, the minimum level of income for which a return was required to be filed equaled the sum of the standard deduction for the particular filing status and the amount of the personal exemption deduction allowed for the taxpayer or taxpayers (but not for any dependents). In addition to the general filing requirements, individuals were required to file a return for Tax Year 2010 if they had net earnings from self-employment of at least \$400; liability for Social Security or Medicare tax on unreported tip income; Social Security, Medicare, or Railroad Retirement tax on reported tip income or group-term life insurance; “alternative minimum tax”; tax on qualified retirement plan distributions, including an individual retirement arrangement (IRA) or a medical savings account (MSA); tax on the recapture of investment credit, education credit, low-income housing credit, or a few other business credits; recapture tax on the disposition of a home purchased with a Federally subsidized mortgage; any advance earned income credit payments;

or wages of \$108.28 or more from a church or qualified church-controlled organization that was exempt from Social Security taxes.

Gross income includes all income received as money, goods, property, or services that was not expressly exempt from tax.<sup>14</sup> Adjusted gross income (AGI) is equal to gross income less deductions for certain expenses.<sup>15</sup> “Taxable income,” the base on which income tax before credits is computed, equals AGI less the amount for personal exemptions and less either total allowable itemized deductions for taxpayers who itemize deductions or the standard deduction (including the additional amounts for age and blindness) for all other taxpayers. The amounts for personal exemptions and total itemized deductions are net of any reductions because of taxpayers’ incomes exceeding certain income thresholds.

Income tax before credits is calculated from taxable income using: tax tables or tax rate schedules, both of which vary with taxpayer filing status (single, married filing jointly, surviving spouse, married filing separately, and head of household); Form 8615 or Form 8814 for children’s investment income; Schedule J for farmers and fishermen to income-average; foreign-earned income worksheet; Schedule D and Qualified Dividends worksheet for net long-term capital gains and qualified dividends; or some combination of the above. For 2010, the tax rates for each filing status were 0 percent, 10 percent, 15 percent, 25 percent, 26 percent, 28 percent, 33 percent, and 35 percent. The tax rates of 0, 15, 25, and 28 percent were used for qualified dividends and net long-term capital gains (in excess of net short-term capital losses), as well as ordinary income. The 26-percent tax rate was only for the alternative minimum tax. Income tax before credits includes any alternative minimum tax.<sup>16</sup>

To calculate their Federal income tax liability for 2010, taxpayers used either the tax table or the tax rate schedules. Taxpayers with taxable income less than \$100,000 were required to use the tax table, while those with taxable income of \$100,000 or more were required to use the tax rate schedules. The tax table was based

<sup>13</sup> Taxpayers fall into one of five filing statuses: single; married filing jointly; married filing separately; head of household; or surviving spouse. Being age 65 or older or being legally blind affects the amount of the standard deduction and, hence, the filing requirements. Taxpayers who are (or could be) dependents of other taxpayers have different filing requirements. For more information on the general filing requirements, see Bryan, Justin, “Individual Income Tax Returns, 2010,” *Statistics of Income Bulletin*, Fall 2012, Volume 32, Number 2.

<sup>14</sup> As defined under section 61 of the Internal Revenue Code, gross income includes amounts from wages and salaries, interest and dividends, alimony, bartering income, canceled debt income, gambling winnings, rents and royalties, and gains from property sales or exchanges, as well as gross income from sole proprietorships and farming, income from partnerships and S corporations, and distributions from estates and trusts. This definition of gross income is slightly different from the Form 1040, *U.S. Individual Income Tax Return*, and concept of “total income,” which is a component of the adjusted gross income (AGI) calculation on Form 1040. Total income includes net amounts rather than gross amounts (income prior to deductions) from such items as business income and rents and royalties.

<sup>15</sup> As defined under Internal Revenue Code section 62, deductible expenses are those incurred in the course of a trade or business or in connection with rents and royalties; losses from property sales or exchanges; and certain statutory adjustments, such as deductible contributions to an IRA or Keogh plan, moving expenses, the health insurance deduction for certain self-employed taxpayers, and one-half of self-employment tax.

<sup>16</sup> Income tax before credits includes tax on lump-sum distributions from qualified retirement plans.

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on income tax “brackets” up to \$50 wide.<sup>17</sup> The tax within each bracket was based on the tax calculated at the midpoint of the bracket and then rounded to the nearest whole dollar. As a result, the tax tables and the tax rate schedules could produce different amounts of tax for the same amount of taxable income. Use of the tax tables could have produced either a slightly higher or lower amount of tax than that produced by the tax rate schedules. For taxpayers using the tax tables with taxable income that was subject to the 28-percent marginal rate, the maximum difference in tax between the tax rate schedules and the tax table was \$7.<sup>18</sup> However, for most taxpayers, the actual difference in tax was smaller.

## Changes in Law for 2010

The definitions used in this article are generally the same as those in *Statistics of Income—2010, Individual Income Tax Returns* (IRS Publication 1304). The following is a partial list of tax law and Internal Revenue Service administrative changes that had a major bearing on the Tax Year 2010 data presented in this article.

**Adoption credit**—For Tax Year 2010, the adoption credit was refundable for the first time and the maximum credit amount increased from \$12,150 to \$13,170. The credit began to phase out if a taxpayer had modified adjusted gross income in excess of \$182,520 and completely phased out for modified adjusted gross income of \$222,520 or more.

**Alternative minimum tax (AMT)**—For Tax Year 2010, the alternative minimum tax exemption rose to \$72,450 for a married couple filing a joint return, up from \$70,950 in 2009, and to \$47,450 for singles and heads of household, up from \$46,700, and to \$36,225 from \$35,475 for a married person filing separately.

**Credit for small employer health insurance premiums**—Eligible small employers could have claimed this credit for health insurance premiums after 2009. The credit was generally 35 percent of premiums paid and could have been taken against both regular and alternative minimum tax. The credit could be claimed as part of the general business credit on Form 3800, *General Business Credit*.

**Domestic production activities deduction**—For 2010, taxpayers could have deducted up to 9 percent of their qualified production activities income. This deduction was reduced if the taxpayer had oil-related qualified production activities income. For 2009, this deduction was limited to 6 percent.

**Earned income credit**—The maximum amount of the earned income credit increased, as did the amounts of earned income an individual could have and still claim the credit. The maximum credit for taxpayers with no qualifying children remained \$457. For these taxpayers, earned income and AGI had to be less than \$13,460 (\$18,470 if married filing jointly) to get any EIC. For taxpayers with one qualifying child, the maximum credit increased \$7 to \$3,050, for taxpayers with two qualifying children, the maximum credit increased to \$5,036 from \$5,028, and for taxpayers with three or more qualifying children, the maximum credit increased to \$5,666 from \$5,657. To be eligible for the credit, a taxpayer’s earned income and AGI had to be less than \$35,535 (\$40,545 for married filing jointly) for one qualifying child, less than \$40,363 (\$45,373 for married filing jointly) for two qualifying children, or less than \$43,352 (\$48,362 for married filing jointly) for three or more qualifying children.

**Exemption amount**—For 2010, the exemption amount was \$3,650, the same as that for 2009. Also, high-income taxpayers no longer lost part of their deduction for personal exemptions as part of a phase out, regardless of the amount of their AGI. For 2008 and 2009, a taxpayer could lose no more than 1/3 of the dollar amount of their exemption, so the amount of each exemption could not be reduced to less than \$2,433. For 2007 and 2006, a taxpayer could lose no more than 2/3 of the dollar amount of their exemption. For 2005 and previous years, exemption amounts could be limited to zero.

**First-time homebuyer credit**—For Tax Year 2010, a taxpayer may have claimed this credit (up to \$8,000, or \$4,000 if married filing separately) if he or she actually bought a home before October 1, 2010 (if the taxpayer entered a written binding contract before May 1, 2010), and did not own a main home during the prior 3 years. Certain members of the Armed Forces and certain other taxpayers had additional time to buy a home and take the credit. Taxpayers were only allowed to claim this credit in Tax Year 2010 if their modified AGI was below \$145,000 (\$245,000 if married filing jointly). Taxpayers may have claimed this credit (up to \$6,500, or \$3,250 if married filing separately) if they were considered a long-time resident of the same home. Taxpayers were considered a long-time resident of the same home if they previously owned and used the same main home for any 5-consecutive-year period during the 8-year period ending on the date of the purchase of the new home. For homes purchased in 2009 or 2010, taxpayers had to repay

<sup>17</sup> For taxable income between \$0 and \$5 and between \$5 and \$25, the tax brackets were \$5 and \$10 wide, respectively. For taxable income between \$25 and \$3,000, the brackets were \$25 wide. For taxable income above \$3,000 the brackets were \$50 wide.

<sup>18</sup> For example, assume a taxpayer filing as “married filing separately” reported taxable income of \$99,950. Using the tax table, the tax would be \$22,115, but, using the tax rate schedules, the tax would be \$22,108, a difference of \$7 (how did you do this, when the tax tables now start at 100,000?).

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the credit only if the home ceased to be their main home within a 36-month period beginning on the purchase date.

*General business credit*—New for 2010, the Small Business Jobs Act of 2010 allowed general business credits of eligible small businesses to offset both regular tax and alternative minimum tax (AMT) for tax years beginning in 2010. Such eligible small business credits determined in the first tax year in 2010 are carried back 5 years. For purposes of the statistics in this publication, an eligible small business is a sole proprietorship where the average annual gross receipts (reduced by returns and allowances) of the small business could not exceed \$50 million for the 3-tax-year period preceding the tax year of the credits.

*Health savings account deduction*—The deduction was limited to the annual deductible on the qualifying high deductible health plan, but not more than \$3,050 (\$6,150 if family coverage), an increase from \$3,000 (\$5,950 if family coverage) for 2009. These limits were \$1,000 higher if the taxpayer was age 55 or older (\$2,000 if both spouses were 55 or older).

*Individual retirement arrangement deduction*—For taxpayers covered by a retirement plan, the IRA deduction phased out between \$56,000 and \$66,000 of modified AGI for single filers (\$89,000 and \$109,000 for married filing jointly or qualifying widow(er)). This was up from \$55,000 and \$65,000 for single filers (\$85,000 and \$105,000 for married filing jointly or qualifying widow(er)) in 2009. If one spouse was an active participant in an employer plan but the other was not, the deduction for the IRA contribution of the spouse not covered by an employer plan phased out between modified AGI of \$167,000 and \$177,000, up from \$166,000 and \$176,000 for 2009. For 2010, taxpayers were allowed to make a qualified rollover to a Roth IRA regardless of these AGI limitations. Half of the income realized from the rollover or conversion could have been included in income in 2011 and the other half in 2012, or the taxpayer could have elected to have all of the income included in 2010. Also, starting in 2010, all taxpayers (including married taxpayers filing separately) were eligible to make taxable rollovers of traditional IRAs to Roth IRAs without paying the 10-percent tax on early withdrawals.

*Itemized deductions*—For 2010, high-income taxpayers no longer lost part of their itemized deductions as part of a phase out, regardless of their AGI. For Tax Years 2008 and 2009, the amount by which the deduction was reduced was only 1/3 of the original reduction amount. For Tax Years 2006 and 2007, the amounts by which the deduction was reduced was only 2/3 of the amount of the reduction that would have otherwise applied (for 2005 and previous years).

*Personal casualty and theft loss deduction*—The limit on personal casualty and theft loss was reduced for Tax Year 2010. Each loss was now limited to the excess of the loss over \$100, down from the \$500 limit that applied for 2009.

*Self-employed health insurance deduction*—For 2010, a taxpayer could have reduced their net self-employment income on Schedule SE by the amount of self-employed health insurance deduction entered on line 29 of Form 1040. Effective March 30, 2010, if a taxpayer was self-employed and paid for health insurance, they were able to include in their deduction on line 29 any premiums they paid to cover their child who was under age 27 at the end of 2010, even if the child was not their dependent.

*Standard deduction*—For 2010, the standard deduction was increased to \$8,400 for heads of households. For 2009, the standard deduction for heads of households was \$8,350. The tax benefits for an increased standard deduction for real estate taxes or a net disaster loss occurring after 2009 were not available for 2010. Additionally, an increased standard deduction for State or local taxes on the purchase of a new motor vehicle was only available if the vehicle was bought in 2009 after February 16th and the tax was paid in 2010.

*Unemployment compensation*—For 2010, all unemployment compensation received was generally taxable. The exclusion of the first \$2,400 of unemployment compensation received from taxable income expired at the end of 2009.

## Income and Tax Concepts

As discussed in the Income Tax Structure section, gross income is all income received that is not specifically excluded. Total income is the net amount of gross income after certain expenses (e.g., business or rent and royalty expenses) have been deducted. Adjusted gross income (AGI) is total income less statutory adjustments to income (e.g., deductible contributions to an IRA or Keogh plan).

## 1979 Income Concept

To analyze changes in income and taxes over a period of years, a consistent definition of income should be used. Because the components of AGI may vary from year to year as the law changes, the “1979 Income Concept” was developed to provide a more uniform measure of income across tax years. By including the same income and deduction items in each year’s income calculation and using only items available on Federal individual income tax returns, the definition of the 1979 Income Concept is consistent throughout the base years and can be used for future years to compare income by including only

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income components common to all years. Tax Years 1979 through 1986 were used as base years in identifying the income and deduction items included in this concept. The 1979 Income Concept applied to 2010 includes many income and deduction items that are also components of AGI (Figure G). However, unlike AGI, the 1979 Income Concept also includes some nontaxable (i.e., tax-exempt) amounts of income reported on individual income tax returns and disallowed passive loss deductions. In addition, only straight-line deductions for depreciation are included in the 1979 Income Concept.<sup>19</sup>

## Figure G

### Components of the 1979 Income Concept, Tax Year 2010

#### Income or Loss:

- Salaries and wages [1]
- Interest [1]
- Dividends [1]
- Taxable refunds [1]
- Alimony received [1]
- Capital gain distributions not reported on Schedule D [1]
- Capital gains reported on Schedule D minus allowable losses [1]
- Other gains and losses (Form 4797) [1]
- Business net income or loss [1]
- Farm net income or loss [1]
- Rent net income or loss [1]
- Royalty net income or loss [1]
- Partnership net income or loss [1]
- S Corporation net income or loss [1]
- Farm rental net income or loss [1]
- Estate or trust net income or loss [1]
- Unemployment compensation [1]
- Depreciation in excess of straight-line depreciation [2]
- Total pension income [3], [4]
- Other net income or loss [5]
- Net operating loss [1]

#### Deductions:

- Disallowable passive losses (Form 8582) [6]
- Moving expenses [1]
- Alimony paid [1]
- Unreimbursed business expenses [6]

[1] Included in adjusted gross income (less deficit) (AGI) for Tax Year 2010.

[2] Adjustment to add back excess depreciation (accelerated over straight-line depreciation) deducted in the course of a trade or business and included in net income (loss) amounts shown above.

[3] Includes taxable and tax-exempt pension and retirement distributions, including IRA distributions.

[4] Not fully included in AGI for Tax Year 2010.

[5] Includes an adjustment to add back amounts reported for the "foreign-earned income exclusion."

[6] Not included in AGI for Tax Year 2010.

## Modified Taxable Income

This concept is relevant only for "prior-year returns" (about 5.0 million returns) or certain farm sole proprietor

## Figure H

### Income Tax Calculation for a Single Taxpayer With One Exemption Who Used the Standard Deduction, Tax Year 2010

[Money amounts are in dollars]

Item	Amount
Adjusted gross income	410,000
Less: Exemption	3,650
Standard deduction	5,700
Equals: Taxable income	400,650
Tax based on tax rates for single taxpayers:	
First \$8,375 taxed at 10 percent	838
Next \$25,625 taxed at 15 percent	3,844
Next \$48,400 taxed at 25 percent	12,100
Next \$89,450 taxed at 28 percent	25,046
Next \$201,800 taxed at 33 percent	66,594
Next \$27,000 taxed at 35 percent	9,450
Total tax from tax rate schedule	117,871

NOTE: Detail may not add to total due to rounding.

returns using income-averaging on Schedule J (about 69 thousand returns) or those returns with foreign-earned income having to use a worksheet to determine their taxes (about 173.2 thousand returns). For all other returns, modified taxable income is identical to taxable income.

This is the term used in the statistics to describe "income subject to tax," the actual base on which tax is computed. Each year, a small number of returns for prior tax years are filed during the same calendar year in which the tax returns for the current tax year are being selected for the Statistics of Income sample. Some of these returns are selected for the sample and act as proxies for returns for the current tax year that will be filed during a later calendar year. The tax on these returns is based on a previous year's tax law (which may reflect different tax rates and income concepts). For the statistics in this article, the taxable incomes reported on these prior-year returns and those filed with a Schedule J or foreign-earned income are modified to equal an amount necessary to generate the tax actually shown on these returns using current-year rates.

## Marginal Tax Rates

Under the progressive U.S. income tax rate structure, different portions of taxable income are taxed at different rates. Figure H illustrates how income tax is determined for a single taxpayer with AGI of \$410,000 who used the standard deduction. As shown in the example, six different tax rates were applied to the taxable income to arrive at total tax. The first \$8,375 of taxable income were taxed

<sup>19</sup> For more details on the income computation under the 1979 Income Concept for 2010, see *Statistics of Income—2010, Individual Income Tax Returns*, Statistics of Income Division, Internal Revenue Service, Publication 1304.

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at the 10-percent rate; the next \$25,625 of taxable income were taxed at the 15-percent rate; the next \$48,400 were taxed at the 25-percent rate; the next \$89,450 were taxed at the 28-percent rate; the next \$201,800 were taxed at the 33-percent rate; and the remaining \$27,000 were taxed at the 35-percent rate. For purposes of this article, the tax rate applied to the last dollar of income (given certain assumptions about which source of income provided the last dollar of income subject to tax) is the marginal tax rate for that return. In the example, the marginal tax rate is 35 percent.

Since the individual income tax structure includes various types of income, deductions, exclusions, credits, and taxes that are not subject to the same treatment under tax laws, the marginal tax rate is not always apparent. For instance, investment income of a dependent under age 18 in excess of a specific amount is treated differently than salaries and wages of the same dependent (see Changes in Law section on tax on child's investment income). The investment income in excess of \$1,900 was taxed at the marginal tax rate of the parents, whereas the salaries and wages were taxed at the dependent's own rate.

Calculating marginal tax rates for a specific individual income tax return generally depends both on the types and amounts of income reported and the assumptions made about the order in which the income is taxed, in particular, which type of income is assumed to be received "last." Additional complexity is added by the presence of such items as the alternative minimum tax and various tax credits.

For this article, it is assumed that the income taxed at the marginal (highest) rate was the "last" income received. The alternative minimum tax and income tax credits, such as the earned income credit, are excluded in determining the marginal tax rates. The marginal tax rate is defined as follows:

- 1) If a return showed taxable income, the marginal tax rate of the return was the highest rate at which any amount of taxable income reported on the return was taxed.
- 2) If the return had no taxable income except for net long-term capital gains or qualified dividends and that amount was less than or equal to the 15-percent tax bracket limit, the return was defined as having a "0-percent" marginal tax rate. If the return had taxable income (from other than net long-term capital gains) to which only the 15-percent tax rate applied, as well as net long-term capital gains to which the 25-percent rate on the net gain applied, the return was defined as having a marginal tax rate equal to

the maximum rate at which the net gains were taxed. If the return had taxable income (from other than net long-term capital gains) to which the 25-percent tax rate applied as the highest rate, as well as net long-term capital gains to which the maximum 28-percent rate on net gain applied, the return was defined as having a "28-percent" marginal tax rate. However, if the return had taxable income (from other than net long-term capital gains) above the maximum amount to which the 25-percent rate applied, as well as net long-term capital gains to which the 28-percent rate on the net gain applied, the return was classified as having the highest rate at which any amount of taxable income reported on the return was taxed.

- 3) For returns of dependents with a Form 8615 attached when use of this form resulted in taxation of some of the dependent's income as if it were that of the parents, the return was classified as having a "Form 8615" marginal tax rate (the returns in the Form 8615 classification are not distributed by tax rate).
- 4) For returns of parents choosing to report interest, dividend, and capital gain distribution income of their dependents under age 18 (or under 24 if students) on their own (i.e., the parents') return using Form 8814, when the dependent's income generated the only tax liability on the parent's return, the return was classified with a "Form 8814" marginal tax rate of 10 percent.

The classification of returns into marginal tax rate categories for Statistics of Income purposes was essentially a function of filing status, size of taxable income, presence of net long-term capital gains (in excess of net short-term capital losses) and/or qualified dividends, and presence of Form 8615 or Form 8814. Returns were classified into one of the following 13 mutually exclusive marginal tax rate categories: (1) 0-percent rate; (2) 0 percent (capital gains); (3) 10-percent rate; (4) Form 8814 (10-percent rate with no tax liability other than that generated by the dependent's income); (5) 15-percent rate; (6) 15 percent (capital gains); (7) 25-percent rate; (8) 25-percent (capital gains); (9) 28-percent rate; (10) 28 percent (capital gains); (11) 33-percent rate; (12) 35-percent rate; and (13) Form 8615 (with income taxed at any rate).

Table 1 presents statistics by marginal tax rate classification and filing status for returns with modified taxable income. For each marginal rate classification, modified taxable income and "income tax generated" were computed "at all rates" and "at marginal rate." The "at-all-rates" computations (columns 3 and 5) show the

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total amount of modified taxable income or tax generated, tabulated by the marginal tax rate specified; each tax rate classification is mutually exclusive. The “at-marginal-rate” computations (columns 4 and 6) report the specific amounts of modified taxable income taxed and the tax generated at the marginal tax rate shown, for all returns in each of the marginal rate classifications. Although the alternative minimum tax (AMT) was not included in the determination of the marginal tax rate, we show at what rate individuals with AMT have been classified (column 10).

For example, consider returns in the “joint returns and returns of surviving spouses” filing status that were included in the “35-percent” marginal tax rate classification. The total modified taxable income for the estimated 715,195 returns in this classification “at all rates” was \$831.7 billion (column 3), and the total tax generated was \$245.7 billion (column 5). Approximately \$443.0 billion (column 4) of the modified taxable income were subject to tax at the marginal tax rate of 35 percent. This modified taxable income generated \$155.1 billion (column 6) in tax at the 35-percent tax rate with the remainder generated at some or all of the lower eight tax rates. Some 56.2 percent of these returns, or 401,745, paid AMT.

Table 2 provides statistics on the tax generated (regular tax before credits), in total and at each tax rate bracket, for returns with modified taxable income. Returns in this table are classified by size of AGI. The tax generated at each tax rate was computed based on the modified taxable income for each individual return.

For example, the 3.4 million returns included in the “\$200,000 under \$500,000” income-size classification showed total modified taxable income of \$784.1 billion and generated total tax of \$181.1 billion. Of this \$784.1 billion of modified taxable income, \$53.7 billion were

taxed at 10 percent (ordinary tax rate); \$162.7 billion were taxed at 15 percent (ordinary tax rate); \$220.1 billion were taxed at the 25-percent (ordinary tax) rate; \$180.9 billion were taxed at the 28-percent (ordinary tax) rate; \$110.7 billion were taxed at the 33-percent rate; and \$5.5 billion were taxed at the 35-percent rate. Approximately \$3.6 billion were taxed at the 0-percent (capital gains) rate; \$45.4 billion were taxed at the 15-percent capital gain and qualified dividend rate; \$1.0 billion were taxed at the 25-percent capital gain rate; \$0.2 billion were taxed at the 28-percent capital gain rate, with the remainder from tax related to Forms 8814 and 8615.

Table 3 presents statistics on the income and tax generated at each tax rate, by filing status, for returns with modified taxable income. Over 0.7 million of the 44.7 million jointly filed returns (including surviving spouses) with modified taxable income had some income taxed at the 35-percent tax rate. For these returns, the taxable income subject to this rate was \$443.0 billion, and the tax generated was \$155.1 billion.

## Computation of Alternative Minimum Taxable Income

Alternative Minimum Taxable Income (AMTI) was computed by adding certain “tax preferences” (i.e., deduction or exclusion amounts identified as potential sources of tax savings disallowed for AMT purposes) and “adjustments” (i.e., regular tax deduction amounts recomputed or excluded for AMT purposes) to taxable income before any deductions were taken for personal exemptions (Figures I and J). The “net operating loss deduction” was recomputed to allow for the exclusion of the “tax preference items” and “adjustments” used to reduce regular tax liability. The recomputed net operating loss deduction, termed the “alternative net operating loss deduction,” was limited to 90 percent of AMTI (with certain minor exceptions for 2010).

AMTI was reduced by an exemption amount which depended on the filing status of the individual and which was subject to phase-out at higher AMTI levels. The AMT exemption for single filers (and heads of households) for 2010 was \$47,450; for joint filers and surviving spouses, \$72,450; and for married persons filing separately, \$36,225. The exemption was reduced (but not below zero) by 25 percent of the amount by which the AMTI exceeded threshold levels of \$112,500 for single filers and heads of households, \$150,000 for joint filers, and \$75,000 for married persons filing separately. The exemption was phased out completely for individuals whose filing status was single or head of household,

## Figure I

### Calculation of Alternative Minimum Taxable Income (AMTI), Tax Year 2010

	Taxable income before deduction for personal exemptions
PLUS:	Adjustments and preferences (see Figure J)
PLUS:	Net operating loss deduction
MINUS:	Alternative tax net operating loss deduction [1]
EQUALS:	Alternative minimum taxable income

[1] Limited to 90 percent of AMTI, except when depletion is present on Form 6251. In this case, AMTI is recalculated, and the alternative tax net operating loss deduction is limited to 90 percent of the recalculated amount.

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## Figure J

### Alternative Minimum Tax Adjustments and Preferences, Tax Year 2010

- Medical and dental expenses from Schedule A (the lesser of deductible medical and dental expenses or 2.5 percent of AGI)
- Deductions for State and local income, sales, real estate, personal property, and foreign taxes
- Home mortgage interest adjustment on the worksheet from the Form 6251 instructions
- Miscellaneous itemized deductions subject to the 2-percent-of-AGI limitation
- If standard deduction is claimed, amount from Schedule L, line 6, net casualty theft or loss, and line 17, motor vehicle sales tax
- Refunds of State and local income, sales, real estate, personal property, and foreign taxes previously deducted (negative)
- Investment interest expense (the result could be negative)
- Excess of percentage depletion deduction for sections 611 and 613 property over the adjusted basis (the result could be negative)
- Deduction for net operating loss from Form 1040
- Tax-exempt interest from private activity bonds issued after August 7, 1986, and before 2009
- Excluded gain, under the section 1202 gain on qualified small business stock held more than 5 years, multiplied by 7 percent if sold after May 5, 2003, otherwise multiplied by 42 percent
- Incentive stock options that were exercised after 1987 (the amount by which the value of the option when exercised exceeded the price paid by the taxpayer; the result could be negative)
- Difference between income distributions to beneficiaries of estates and trusts for regular tax purposes and the amounts refigured for AMT purposes (the result could be negative)
- Electing large partnerships, enter the amount from Schedule K-1 (Form 1065-B), box 6.
- Adjustment of gain or loss on property, the basis of which was affected by accelerated depreciation or rapid amortization and which was reduced for AMT purposes (the result could be negative)
- Excess of depreciation on property placed in service after 1986 over less liberal methods allowed for alternative minimum tax (AMT) purposes (straight-line or 150-percent declining balance method, depending on the type of property; the result could be negative)
- Passive activity gains and losses allowed for regular tax purposes for activities acquired before October 23, 1986, taking into account AMT adjustments and preference items and any AMT prior-year unallowed losses (the result could be negative)
- Adjustment for refigured loss from activities in which allowable losses from partnerships or S Corporations were limited by "at-risk" and other rules, taking into account AMT adjustments and preference items (the result could be negative)
- Excess of circulation expenditures paid or incurred after 1986 over allowable amortization if the expenditures were capitalized (the result could be negative)
- Deferred income from long-term contracts entered into after February 28, 1986, with certain exceptions and limitations (the result could be negative)
- Excess of mining exploration and development costs paid or incurred after 1986 over allowable amortization if the expenditures were capitalized (the result could be negative)
- Excess of research and experimental expenditures paid or incurred after 1986 over allowable amortization if the expenditures were capitalized (the result could be negative)
- Adjustment from disallowing the installment sales method of accounting for sales of inventory and stock in trade after March 1, 1986, with certain exceptions (the result is negative)
- Amount by which excess intangible drilling costs deducted currently over allowable amortization (if these costs were capitalized) was more than 65 percent of the taxpayer's "net income" from oil, gas, and geothermal wells, with exceptions for independent oil producers and royalty owners
- Excess of accelerated depreciation on property placed in service using pre-1987 rules over straight-line depreciation as refigured for AMT purposes
- Adjustment for taxable distributions received from a cooperative (total AMT patronage dividend and per-unit retain allocation adjustment)
- Excess of rapid amortization of pollution control facilities placed in service after 1986 over otherwise allowable depreciation (the result could be negative)
- Adjustment for charitable contributions of certain property for which section 170(e) of the Internal Revenue Code applies
- Adjustment for alcohol and cellulosic biofuel fuels credit and biodiesel and renewable diesel fuels credit included in taxable income (the amount is included as a negative)
- Adjustment for refigured tax shelter farm gains or losses, taking into account AMT adjustments and preference items (the result could be negative)
- Related adjustments, refigured for AMT purposes, including section 179 expense deduction, expenses for business or rental use of the home, conservation expenses, taxable IRA distributions, self-employed health insurance deduction, Keogh retirement plan or self-employed SEP deduction, and IRA deductions (the result could be negative)
- Deduction for alternative tax net operating loss

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married filing jointly, and married filing separately, at \$302,300, \$439,800, and \$219,900 of AMTI, respectively.

After reduction by the exemption, the first \$175,000 (\$87,500 if married filing separately) of the remaining AMTI was subject to tax at a 26-percent rate, with any excess taxed at a 28-percent rate. However, capital gains and qualified dividends (recalculated for AMT purposes) that were taxed at lower rates (0 percent, 15 percent, and 25 percent) were taxed at these same rates for the AMT, with the rest of AMTI being taxed at the rates mentioned above (26 percent or 28 percent). The resulting tax was reduced by the “alternative minimum tax foreign tax credit,” which produced a “tentative minimum tax.” Tentative minimum tax was further reduced by the individual’s regular tax before credits (excluding tax on lump-sum distributions from qualified retirement plans) less the foreign tax credit (for regular tax purposes) to yield the alternative minimum tax.

Dependents under the age of 18 and certain children under 24 with investment income over a certain amount who filed their own returns were subject to special rules for AMT purposes. These rules required that the dependents pay the same amount of AMT as their parents would have paid if the parents included the dependents’ incomes on their own tax returns. (Dependents filing their own returns were limited to an AMT exemption of \$6,700 plus their “earned incomes.”) The dependent’s AMT could be reduced if the parents had regular tax greater than the child’s own tentative minimum tax, or if any other dependent under age 18 and certain children

under 24 of the same parents had regular tax greater than this dependent’s own tentative minimum tax.)

## Data Sources and Limitations

These statistics are based on a sample of individual income tax returns (Forms 1040, 1040A, and 1040EZ, including electronically filed returns) filed during Calendar Year 2010. Returns in the sample were stratified based on: (1) the larger of positive income or negative income (absolute value); (2) the size of business and farm receipts; (3) the presence or absence of specific forms or schedules; and (4) the usefulness of returns for tax policy modeling purposes.<sup>20</sup> Returns were then selected at rates ranging from 0.10 percent to 100 percent. The 2010 data are based on a sample of 308,946 returns and an estimated final population of 143,170,763 returns.<sup>21</sup> The corresponding sample and population for the 2009 data were 295,133 and 140,599,266 returns, respectively.

Since the data presented here are estimates based on a sample of returns filed, they are subject to sampling error. To properly use the statistical data provided, the magnitude of the potential sampling error must be known; coefficients of variation (CVs) are used to measure that magnitude. Figure K shows estimated CVs for the numbers of returns and money amounts for selected income items. The reliability of estimates based on samples, and the use of coefficients of variation for evaluating the precision of estimates based on samples, are discussed in the SOI Sampling Methodology and Data Limitations, later in this issue of the *SOI Bulletin*.

<sup>20</sup> Returns in the sample were stratified based on the presence or absence of one or more of the following forms or schedules: Form 2555, *Foreign Earned Income*; Form 1116, *Foreign Tax Credit (Individual)*; Schedule C, *Profit or Loss from Business (Sole Proprietorship)*; and Schedule F, *Profit or Loss from Farming*.

<sup>21</sup> This population includes an estimated 278,712 returns that were excluded from other tables in this article because they contained no income information or represented amended or tentative returns identified after sampling.

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## Figure K

### Coefficients of Variation for Selected Items, by Size of Adjusted Gross Income, Tax Year 2010

[Coefficients of variation are percentages]

Size of adjusted gross income	Modified taxable income		Tax generated	Income tax after credits	Total income tax
	Number of returns	Amount			
		(1)	(2)	(5)	
<b>Total</b>	<b>0.01</b>	<b>0.12</b>	<b>0.15</b>	<b>0.17</b>	<b>0.17</b>
Under \$2,000 [1]	1.09	9.25	12.51	44.89	44.89
\$2,000 under \$4,000	1.49	8.87	11.61	11.66	11.66
\$4,000 under \$6,000	1.46	10.01	13.11	13.31	13.31
\$6,000 under \$8,000	1.40	3.92	4.37	4.39	4.39
\$8,000 under \$10,000	1.32	3.63	3.79	4.07	4.07
\$10,000 under \$12,000	1.36	2.39	2.42	4.06	4.06
\$12,000 under \$14,000	1.31	2.04	2.07	3.87	3.87
\$14,000 under \$16,000	1.38	2.04	2.10	3.11	3.11
\$16,000 under \$18,000	1.41	1.97	2.01	2.65	2.65
\$18,000 under \$20,000	1.44	1.92	1.96	2.51	2.51
\$20,000 under \$25,000	0.93	1.18	1.22	1.55	1.55
\$25,000 under \$30,000	1.00	1.17	1.22	1.57	1.57
\$30,000 under \$40,000	0.76	0.85	0.88	1.07	1.07
\$40,000 under \$50,000	0.86	0.92	0.96	1.12	1.12
\$50,000 under \$75,000	0.53	0.57	0.60	0.71	0.71
\$75,000 under \$100,000	0.78	0.80	0.84	0.91	0.91
\$100,000 under \$200,000	0.52	0.52	0.55	0.58	0.58
\$200,000 under \$500,000	0.61	0.59	0.61	0.61	0.61
\$500,000 under \$1,000,000	1.07	0.99	1.00	1.01	1.01
\$1,000,000 under \$1,500,000	1.35	1.34	1.38	1.38	1.38
\$1,500,000 under \$2,000,000	0.95	0.97	1.00	1.01	1.01
\$2,000,000 under \$5,000,000	0.61	0.54	0.57	0.57	0.57
\$5,000,000 under \$10,000,000	0.70	0.62	0.65	0.66	0.66
\$10,000,000 or more	0	0	0	0	0

[1] Includes returns with adjusted gross deficit.

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**Table 1. All Returns: Tax Classified by Marginal Tax Rate [1] and by Filing Status, Tax Year 2010**

[All figures are estimates based on samples—money amounts are in thousands of dollars]

Filing status and marginal tax rate classes	Classified by the highest marginal rate at which tax was computed				
	Number of returns	Adjusted gross income less deficit	Modified taxable income		Tax generated
			At all rates	At marginal rate	At all rates
	(1)	(2)	(3)	(4)	(5)
<b>All returns</b>					
<b>All tax rates</b>	<b>142,892,051</b>	<b>8,089,142,092</b>	<b>5,503,672,955</b>	<b>1,960,411,503</b>	<b>1,037,745,104</b>
0 percent	35,576,128	163,180,461	0	0	0
0 percent (capital gains)	714,668	21,896,545	5,946,398	5,946,398	0
10 percent	27,431,153	601,986,289	154,311,877	147,805,136	14,783,424
10 percent (Form 8814) [2]	22,081	-489,835	15,386	15,386	1,536
15 percent	42,321,591	1,998,791,967	1,200,490,826	685,661,507	154,333,195
15 percent (capital gains) [3]	7,313,386	615,702,731	412,282,731	127,047,060	52,313,544
25 percent	22,711,738	2,228,751,217	1,667,563,361	305,053,238	282,287,760
25 percent (capital gains)	110,478	23,068,030	19,170,269	2,271,338	3,259,589
28 percent	4,072,068	756,477,574	605,313,659	52,241,278	127,493,441
28 percent (capital gains)	14,415	4,627,509	3,634,591	823,153	701,712
33 percent	1,559,174	520,748,266	430,265,228	92,015,436	105,116,478
35 percent	854,212	1,151,318,916	1,002,129,828	539,306,690	296,922,721
Form 8615 [4]	190,960	3,082,422	2,548,801	2,224,881	531,704
<b>Joint returns and returns of surviving spouses</b>					
<b>All tax rates</b>	<b>53,596,685</b>	<b>5,258,488,397</b>	<b>3,723,804,323</b>	<b>1,263,992,185</b>	<b>728,307,438</b>
0 percent	8,923,734	22,092,535	0	0	0
0 percent (capital gains)	228,442	12,412,644	3,388,781	3,388,781	0
10 percent	7,611,663	263,272,129	66,046,719	61,922,720	6,193,816
10 percent (Form 8814) [2]	9,342	-450,118	7,548	7,548	753
15 percent	16,723,051	1,144,107,914	681,335,263	401,214,730	88,194,629
15 percent (capital gains) [3]	4,671,161	466,328,426	311,373,020	90,364,630	39,691,415
25 percent	11,033,772	1,427,465,732	1,052,990,042	161,784,944	176,422,574
25 percent (capital gains)	72,288	17,704,655	14,584,510	1,676,764	2,465,307
28 percent	2,386,473	522,886,173	412,576,215	27,869,073	85,250,052
28 percent (capital gains)	10,281	3,274,977	2,564,486	449,782	485,683
33 percent	1,211,283	422,946,239	347,258,611	72,271,775	83,864,277
35 percent	715,195	956,447,092	831,679,128	443,041,436	245,738,931
Form 8615 [4]	0	0	0	0	0
<b>Returns of married persons filing separately</b>					
<b>All tax rates</b>	<b>2,532,292</b>	<b>135,557,247</b>	<b>107,407,714</b>	<b>49,870,233</b>	<b>22,282,036</b>
0 percent	424,309	-10,054,681	0	0	0
0 percent (capital gains)	8,101	208,795	44,836	44,836	0
10 percent	323,687	5,445,567	1,483,319	1,399,917	140,010
10 percent (Form 8814) [2]	* 11	* -72,522	* 4	* 4	* [5]
15 percent	967,022	31,981,978	19,108,615	11,009,808	2,461,365
15 percent (capital gains) [3]	92,057	11,823,282	8,801,574	6,569,967	1,203,596
25 percent	531,911	34,438,072	25,528,408	5,693,562	4,292,773
25 percent (capital gains)	413	267,429	251,768	30,775	40,682
28 percent	112,319	11,972,485	9,638,409	1,204,100	2,004,788
28 percent (capital gains)	* 23	* 108,706	* 90,871	* 67,997	* 22,551
33 percent	42,827	7,844,964	6,558,671	1,437,273	1,574,266
35 percent	29,613	41,593,173	35,901,239	22,411,993	10,542,004
Form 8615 [4]	0	0	0	0	0

Footnotes at end of table.

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**Table 1. All Returns: Tax Classified by Marginal Tax Rate [1] and by Filing Status, Tax Year 2010—Continued**

[All figures are estimates based on samples—money amounts are in thousands of dollars]

Filing status and marginal tax rate classes	Classified by the highest marginal rate at which tax was computed				
	Number of returns	Adjusted gross income less deficit	Modified taxable income		Tax generated
			At all rates	At marginal rate	At all rates
(1)	(2)	(3)	(4)	(5)	
<b>Returns of heads of households</b>					
<b>All tax rates</b>	<b>21,916,717</b>	<b>703,002,968</b>	<b>325,119,558</b>	<b>143,375,500</b>	<b>50,916,265</b>
0 percent	8,300,194	98,310,577	0	0	0
0 percent (capital gains)	10,073	396,963	98,327	98,327	0
10 percent	6,003,649	148,175,748	33,350,447	33,131,551	3,313,640
10 percent (Form 8814) [2]	9,691	21,300	5,822	5,822	582
15 percent	5,683,455	247,835,503	135,910,949	67,991,670	16,990,838
15 percent (capital gains) [3]	285,412	18,413,053	11,515,554	2,787,502	1,453,087
25 percent	1,455,101	130,914,461	94,833,290	22,541,818	16,124,192
25 percent (capital gains)	3,402	554,293	472,239	68,546	82,463
28 percent	109,848	20,514,594	16,197,212	1,942,170	3,553,509
28 percent (capital gains)	* 21	* 52,918	* 45,352	* 24,362	* 10,048
33 percent	35,535	11,860,451	9,822,008	2,339,435	2,466,842
35 percent	20,337	25,953,108	22,868,359	12,444,297	6,921,064
Form 8615 [4]	0	0	0	0	0
<b>Returns of single persons</b>					
<b>All tax rates</b>	<b>64,846,356</b>	<b>1,992,093,480</b>	<b>1,347,341,360</b>	<b>503,173,585</b>	<b>236,239,364</b>
0 percent	17,927,891	52,832,030	0	0	0
0 percent (capital gains)	468,052	8,878,143	2,414,453	2,414,453	0
10 percent	13,492,154	185,092,846	53,431,392	51,350,948	5,135,957
10 percent (Form 8814) [2]	* 3,037	* 11,505	* 2,012	* 2,012	* 201
15 percent	18,948,063	574,866,572	364,136,000	205,445,299	46,686,363
15 percent (capital gains) [3]	2,264,757	119,137,970	80,592,582	27,324,960	9,965,445
25 percent	9,690,955	635,932,952	494,211,621	115,032,914	85,448,221
25 percent (capital gains)	34,375	4,541,654	3,861,752	495,253	671,137
28 percent	1,463,428	201,104,322	166,901,824	21,225,934	36,685,091
28 percent (capital gains)	4,091	1,190,909	933,882	281,011	183,429
33 percent	269,528	78,096,612	66,625,939	15,966,954	17,211,094
35 percent	89,067	127,325,543	111,681,102	61,408,965	33,720,722
Form 8615 [4]	190,960	3,082,422	2,548,801	2,224,881	531,704

Footnotes at end of table.

# Individual Income Tax Rates and Shares, 2010

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**Table 1. All Returns: Tax Classified by Marginal Tax Rate [1] and by Filing Status, Tax Year 2010—Continued**

[All figures are estimates based on samples—money amounts are in thousands of dollars]

Filing status and marginal tax rate classes	Classified by the highest marginal rate at which tax was computed					
	Tax generated	Income tax after credits			Number of returns with alternative minimum tax	
	At marginal rate	Total	As a percentage of			
			Adjusted gross income less deficit	Modified taxable income		
	(6)	(7)	(8)	(9)	(10)	
<b>All returns</b>						
<b>All tax rates</b>	<b>448,008,863</b>	<b>951,670,957</b>	<b>11.8</b>	<b>17.3</b>	<b>4,019,538</b>	
0 percent	0	546,295	0.3	[6]	21,248	
0 percent (capital gains)	0	97,369	0.4	1.6	6,232	
10 percent	14,780,514	4,127,150	0.7	2.7	17,958	
10 percent (Form 8814) [2]	1,536	2,244	[6]	14.6	69	
15 percent	102,849,226	102,796,066	5.1	8.6	73,163	
15 percent (capital gains) [3]	19,057,059	46,261,567	7.5	11.2	142,009	
25 percent	76,263,310	259,637,397	11.6	15.6	636,956	
25 percent (capital gains)	567,835	3,352,110	14.5	17.5	17,762	
28 percent	14,627,558	130,133,124	17.2	21.5	1,309,754	
28 percent (capital gains)	230,483	764,560	16.5	21.0	4,084	
33 percent	30,365,094	112,909,803	21.7	26.2	1,332,289	
35 percent	188,757,342	290,511,482	25.2	29.0	454,246	
Form 8615 [4]	508,906	531,791	17.3	20.9	3,768	
<b>Joint returns and returns of surviving spouses</b>						
<b>All tax rates</b>	<b>307,638,825</b>	<b>675,632,497</b>	<b>12.8</b>	<b>18.1</b>	<b>3,056,170</b>	
0 percent	0	306,559	1.4	[6]	11,241	
0 percent (capital gains)	0	57,403	0.5	1.7	4,137	
10 percent	6,192,272	1,553,837	0.6	2.4	6,097	
10 percent (Form 8814) [2]	753	2,225	[6]	29.5	66	
15 percent	60,182,210	56,400,194	4.9	8.3	27,510	
15 percent (capital gains) [3]	13,554,695	34,321,496	7.4	11.0	89,785	
25 percent	40,446,236	159,525,765	11.2	15.1	395,449	
25 percent (capital gains)	419,191	2,528,603	14.3	17.3	15,132	
28 percent	7,803,340	87,530,723	16.7	21.2	1,019,038	
28 percent (capital gains)	125,939	529,541	16.2	20.6	2,999	
33 percent	23,849,686	90,887,429	21.5	26.2	1,082,973	
35 percent	155,064,503	241,988,722	25.3	29.1	401,745	
Form 8615 [4]	0	0	0.0	0.0	0	
<b>Returns of married persons filing separately</b>						
<b>All tax rates</b>	<b>12,882,728</b>	<b>20,807,228</b>	<b>15.3</b>	<b>19.4</b>	<b>151,727</b>	
0 percent	0	155,341	[6]	[6]	2,090	
0 percent (capital gains)	0	8,173	3.9	18.2	** 64	
10 percent	139,992	51,999	1.0	3.5	**	
10 percent (Form 8814) [2]	* [5]	* [5]	* [6]	* [6]	0	
15 percent	1,651,471	1,831,614	5.7	9.6	9,802	
15 percent (capital gains) [3]	985,495	1,286,847	10.9	14.6	10,047	
25 percent	1,423,391	4,047,050	11.8	15.9	41,123	
25 percent (capital gains)	7,694	43,465	16.3	17.3	410	
28 percent	337,148	1,921,679	16.1	19.9	36,481	
28 percent (capital gains)	* 19,039	* 24,107	* 22.2	* 26.5	* 23	
33 percent	474,300	1,585,630	20.2	24.2	32,266	
35 percent	7,844,198	9,851,323	23.7	27.4	19,422	
Form 8615 [4]	0	0	0.0	0.0	0	

Footnotes at end of table.

# Individual Income Tax Rates and Shares, 2010

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**Table 1. All Returns: Tax Classified by Marginal Tax Rate [1] and by Filing Status, Tax Year 2010—Continued**

[All figures are estimates based on samples—money amounts are in thousands of dollars]

Filing status and marginal tax rate classes	Classified by the highest marginal rate at which tax was computed					
	Tax generated	Income tax after credits			Number of returns with alternative minimum tax	
		At marginal rate	Total	As a percentage of		
		(6)	(7)	(8)	(9)	(10)
<b>Returns of heads of households</b>						
<b>All tax rates</b>	<b>25,261,352</b>	<b>37,608,472</b>	<b>5.3</b>	<b>11.6</b>	<b>308,681</b>	
0 percent	0	13,664	[7]	[6]	1,815	
0 percent (capital gains)	0	2,486	0.6	2.5	** 3,667	
10 percent	3,313,155	175,527	0.1	0.5	**	
10 percent (Form 8814) [2]	582	19	0.1	0.3	3	
15 percent	10,198,751	8,219,326	3.3	6.0	24,171	
15 percent (capital gains) [3]	418,125	1,110,192	6.0	9.6	6,087	
25 percent	5,635,455	14,917,478	11.4	15.7	137,437	
25 percent (capital gains)	17,137	88,649	16.0	18.8	239	
28 percent	543,808	3,911,462	19.1	24.1	93,698	
28 percent (capital gains)	* 6,821	* 11,252	* 21.3	* 24.8	* 21	
33 percent	772,014	2,711,399	22.9	27.6	34,031	
35 percent	4,355,504	6,447,017	24.8	28.2	7,512	
Form 8615 [4]	0	0	0.0	0.0	0	
<b>Returns of single persons</b>						
<b>All tax rates</b>	<b>102,225,961</b>	<b>217,622,760</b>	<b>10.9</b>	<b>16.2</b>	<b>502,959</b>	
0 percent	0	70,732	0.1	[6]	6,101	
0 percent (capital gains)	0	29,306	0.3	1.2	1,949	
10 percent	5,135,095	2,345,787	1.3	4.4	8,275	
10 percent (Form 8814) [2]	* 201	* [5]	* [6]	* [6]	0	
15 percent	30,816,795	36,344,932	6.3	10.0	11,681	
15 percent (capital gains) [3]	4,098,744	9,543,033	8.0	11.8	36,091	
25 percent	28,758,229	81,147,105	12.8	16.4	62,947	
25 percent (capital gains)	123,813	691,392	15.2	17.9	1,982	
28 percent	5,943,262	36,769,259	18.3	22.0	160,538	
28 percent (capital gains)	78,683	199,660	16.8	21.4	1,042	
33 percent	5,269,095	17,725,344	22.7	26.6	183,019	
35 percent	21,493,138	32,224,420	25.3	28.9	25,567	
Form 8615 [4]	508,906	531,791	17.3	20.9	3,768	

\* Estimate should be used with caution because of the small number of sample returns on which it is based.

\*\* Data combined to avoid disclosure of information for specific taxpayers.

[1] For explanation of marginal tax rate, see Income and Tax Concepts section as well as footnote 4 of this article.

[2] Form 8814 was filed for a dependent child, meeting certain age requirements, for whom the parents made an election to report the child's investment income on the parents' tax return. This rate classification is comprised of those returns with a tax liability only from the dependent's income.

[3] The 15 percent capital gains rate also includes qualified dividends.

[4] Form 8615 was filed for a child meeting certain age requirements, to report the child's investment income. The returns in this rate classification are not distributed by tax rate.

[5] Less than \$500.

[6] Percentage not computed.

[7] Less than 0.05%.

NOTE: Detail may not add to totals because of rounding.

## Individual Income Tax Rates and Shares, 2010

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**Table 2. All Returns: Tax Generated [1], by Rate and by Size of Adjusted Gross Income, Tax Year 2010**

[All figures are estimates based on samples—money amounts are in thousands of dollars]

Size of adjusted gross income	Number of returns	Taxable income	Modified taxable income	Tax generated at all rates	Tax generated at specified rate		
					0 percent	0 percent (capital gains)	
					Number of returns	Number of returns	Income taxed at rate
	(1)	(2)	(3)	(4)	(5)	(6)	(7)
<b>Total</b>	<b>142,892,051</b>	<b>5,502,000,658</b>	<b>5,503,672,955</b>	<b>1,037,745,104</b>	<b>35,576,128</b>	<b>10,423,915</b>	<b>42,853,286</b>
Under \$2,000	6,229,611	62,644	64,898	3,332	6,067,405	92,287	30,985
\$2,000 under \$4,000	4,188,381	211,504	214,318	18,078	3,997,928	71,455	47,604
\$4,000 under \$6,000	4,381,505	281,836	283,761	30,051	4,056,028	39,703	42,841
\$6,000 under \$8,000	4,730,204	1,500,243	1,501,214	150,302	3,733,451	61,366	46,146
\$8,000 under \$10,000	5,265,937	2,498,292	2,499,469	250,558	3,945,957	65,071	49,120
\$10,000 under \$12,000	4,994,497	5,919,907	5,927,645	582,050	2,339,287	174,601	116,451
\$12,000 under \$14,000	5,374,208	10,231,033	10,244,098	1,003,572	2,606,594	214,441	203,124
\$14,000 under \$16,000	4,880,504	13,719,288	13,726,874	1,362,228	2,265,786	179,246	240,527
\$16,000 under \$18,000	4,727,757	18,343,632	18,367,033	1,832,713	1,734,526	199,740	281,067
\$18,000 under \$20,000	4,552,263	23,370,404	23,388,040	2,446,636	1,379,342	206,453	290,913
\$20,000 under \$25,000	10,185,282	75,758,308	75,813,969	8,509,244	1,770,556	640,303	903,230
\$25,000 under \$30,000	8,950,075	101,252,604	101,312,218	11,850,147	801,674	694,243	1,308,846
\$30,000 under \$40,000	14,613,296	258,532,507	258,709,089	31,612,546	514,029	1,423,239	3,268,149
\$40,000 under \$50,000	10,992,023	285,711,442	285,916,371	36,782,214	159,232	1,242,442	3,448,367
\$50,000 under \$75,000	18,727,169	735,533,903	735,997,012	104,716,234	129,656	2,389,883	8,410,363
\$75,000 under \$100,000	11,805,382	701,536,561	701,849,816	104,550,473	41,633	1,933,494	9,349,875
\$100,000 under \$200,000	13,997,651	1,373,739,786	1,374,580,722	243,879,068	24,769	654,864	9,151,913
\$200,000 under \$500,000	3,471,723	783,347,436	784,128,917	181,106,075	5,936	99,979	3,640,660
\$500,000 under \$1,000,000	544,224	309,036,735	309,343,375	86,762,330	1,580	22,491	1,012,958
\$1,000,000 under \$1,500,000	126,941	131,137,821	131,095,649	38,419,280	310	6,979	366,950
\$1,500,000 under \$2,000,000	51,550	76,330,993	76,286,300	22,654,398	139	2,959	157,927
\$2,000,000 under \$5,000,000	73,078	188,551,425	188,327,795	55,470,661	239	5,395	295,518
\$5,000,000 under \$10,000,000	17,527	104,713,552	104,504,209	29,795,098	56	1,671	94,735
\$10,000,000 or more	11,264	300,678,803	299,590,163	73,957,817	15	1,609	95,020

Footnotes at end of table.

## Individual Income Tax Rates and Shares, 2010

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**Table 2. All Returns: Tax Generated [1], by Rate and by Size of Adjusted Gross Income, Tax Year 2010—Continued**

[All figures are estimates based on samples—money amounts are in thousands of dollars]

Size of adjusted gross income	Tax generated at specified rate								
	10 percent			10 percent (from Form 8814) [2]			15 percent		
	Number of returns	Income taxed at rate	Tax generated at rate	Number of returns	Income taxed at rate	Tax generated at rate	Number of returns	Income taxed at rate	Tax generated at rate
	(8)	(9)	(10)	(11)	(12)	(13)	(14)	(15)	(16)
<b>Total</b>	<b>106,429,109</b>	<b>1,142,853,178</b>	<b>114,285,318</b>	<b>105,334</b>	<b>73,542</b>	<b>7,351</b>	<b>78,766,490</b>	<b>2,000,877,397</b>	<b>300,131,610</b>
Under \$2,000	90,670	31,613	3,161	2,940	2,233	223	0	0	0
\$2,000 under \$4,000	145,071	122,113	12,211	* 3,055	* 2,072	* 208	0	0	0
\$4,000 under \$6,000	296,526	155,847	15,585	* 3,008	* 1,904	* 190	0	0	0
\$6,000 under \$8,000	984,056	1,339,056	133,906	* 2,016	* 997	* 99	0	0	0
\$8,000 under \$10,000	1,296,710	2,349,782	234,978	* 1,330	* 760	* 76	* 1,018	* 119	* 18
\$10,000 under \$12,000	2,594,201	5,741,892	574,189	* 3,054	* 2,264	* 226	11,198	16,306	2,446
\$12,000 under \$14,000	2,720,718	9,964,178	996,418	* 1,050	* 367	* 37	* 8,004	* 11,832	* 1,775
\$14,000 under \$16,000	2,579,034	13,256,329	1,325,633	* 1,019	* 338	* 34	172,629	175,021	26,253
\$16,000 under \$18,000	2,968,987	17,664,150	1,766,415	** 2,006	** 1,454	** 145	349,173	376,649	56,497
\$18,000 under \$20,000	3,149,874	20,421,880	2,042,188	**	**	**	1,880,621	2,589,443	388,416
\$20,000 under \$25,000	8,330,789	54,685,050	5,468,505	* 1,313	* 943	* 94	4,633,184	20,133,368	3,020,005
\$25,000 under \$30,000	8,088,703	63,120,747	6,312,075	* 2,968	* 1,957	* 195	4,580,844	36,735,845	5,510,377
\$30,000 under \$40,000	14,030,916	134,185,950	13,418,595	10,970	7,904	789	9,862,472	121,136,521	18,170,478
\$40,000 under \$50,000	10,792,423	123,529,825	12,352,983	9,248	5,736	573	9,542,663	152,735,809	22,910,371
\$50,000 under \$75,000	18,520,240	243,141,511	24,314,151	9,397	5,846	583	18,030,696	403,227,792	60,484,169
\$75,000 under \$100,000	11,719,065	171,899,025	17,189,903	19,971	12,287	1,228	11,629,951	423,216,452	63,482,468
\$100,000 under \$200,000	13,903,240	215,220,877	21,522,088	15,220	12,163	1,218	13,863,907	640,400,305	96,060,046
\$200,000 under \$500,000	3,424,756	53,678,107	5,367,811	11,183	8,359	836	3,410,885	162,684,672	24,402,701
\$500,000 under \$1,000,000	529,183	8,264,483	826,448	2,706	2,721	272	526,340	25,048,860	3,757,329
\$1,000,000 under \$1,500,000	121,156	1,881,381	188,138	1,330	1,431	143	120,563	5,706,208	855,931
\$1,500,000 under \$2,000,000	49,025	758,600	75,860	500	616	62	48,835	2,302,424	345,364
\$2,000,000 under \$5,000,000	68,170	1,050,146	105,015	702	772	77	67,956	3,190,609	478,591
\$5,000,000 under \$10,000,000	15,921	243,182	24,318	189	209	21	15,888	739,708	110,956
\$10,000,000 or more	9,673	147,452	14,745	158	210	21	9,661	449,454	67,418

Footnotes at end of table.

## Individual Income Tax Rates and Shares, 2010

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**Table 2. All Returns: Tax Generated [1], by Rate and by Size of Adjusted Gross Income, Tax Year 2010—Continued**

[All figures are estimates based on samples—money amounts are in thousands of dollars]

Size of adjusted gross income	Tax generated at specified rate								
	15 percent (capital gains) [3]			25 percent			25 percent (capital gains)		
	Number of returns	Income taxed at rate	Tax generated at rate	Number of returns	Income taxed at rate	Tax generated at rate	Number of returns	Income taxed at rate	Tax generated at rate
	(17)	(18)	(19)	(20)	(21)	(22)	(23)	(24)	(25)
<b>Total</b>	<b>11,054,402</b>	<b>372,500,016</b>	<b>55,875,312</b>	<b>29,296,669</b>	<b>873,575,754</b>	<b>218,393,939</b>	<b>190,817</b>	<b>4,309,445</b>	<b>1,077,388</b>
Under \$2,000	0	0	0	0	0	0	0	0	0
\$2,000 under \$4,000	0	0	0	0	0	0	0	0	0
\$4,000 under \$6,000	0	0	0	0	0	0	0	0	0
\$6,000 under \$8,000	0	0	0	0	0	0	0	0	0
\$8,000 under \$10,000	0	0	0	0	0	0	0	0	0
\$10,000 under \$12,000	0	0	0	0	0	0	0	0	0
\$12,000 under \$14,000	0	0	0	0	0	0	0	0	0
\$14,000 under \$16,000	0	0	0	0	0	0	0	0	0
\$16,000 under \$18,000	0	0	0	0	0	0	0	0	0
\$18,000 under \$20,000	0	0	0	0	0	0	0	0	0
\$20,000 under \$25,000	0	0	0	* 309	* 227	* 57	0	0	0
\$25,000 under \$30,000	0	0	0	* 999	* 4,040	* 1,010	0	0	0
\$30,000 under \$40,000	0	0	0	* 5,989	* 40,092	* 10,023	0	0	0
\$40,000 under \$50,000	291,788	281,081	42,168	1,993,452	5,863,971	1,465,993	* 997	* 5	* 1
\$50,000 under \$75,000	1,371,170	3,807,709	571,198	6,133,530	77,320,433	19,330,108	11,978	15,566	3,893
\$75,000 under \$100,000	1,292,680	4,926,041	738,932	4,512,079	91,573,580	22,893,395	15,667	20,092	5,024
\$100,000 under \$200,000	5,198,422	28,122,554	4,218,543	12,520,009	427,396,815	106,849,204	75,439	613,724	153,446
\$200,000 under \$500,000	2,231,499	45,358,640	6,803,854	3,353,951	220,125,804	55,031,451	56,633	1,039,324	259,837
\$500,000 under \$1,000,000	425,252	31,902,362	4,785,366	517,061	34,232,147	8,558,037	16,785	866,278	216,572
\$1,000,000 under \$1,500,000	107,135	19,641,422	2,946,216	118,980	7,819,945	1,954,986	4,772	357,307	89,327
\$1,500,000 under \$2,000,000	44,753	13,009,673	1,951,452	48,108	3,162,060	790,515	2,375	186,217	46,555
\$2,000,000 under \$5,000,000	64,947	41,855,558	6,278,335	66,976	4,392,457	1,098,114	3,911	460,246	115,062
\$5,000,000 under \$10,000,000	16,092	31,206,693	4,681,004	15,688	1,023,893	255,973	1,203	277,775	69,444
\$10,000,000 or more	10,666	152,388,283	22,858,243	9,539	620,289	155,072	1,057	472,911	118,228

Footnotes at end of table.

## Individual Income Tax Rates and Shares, 2010

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**Table 2. All Returns: Tax Generated [1], by Rate and by Size of Adjusted Gross Income, Tax Year 2010—Continued**

[All figures are estimates based on samples—money amounts are in thousands of dollars]

Size of adjusted gross income	Tax generated at specified rate								
	28 percent			28 percent (capital gains)			33 percent		
	Number of returns	Income taxed at rate	Tax generated at rate	Number of returns	Income taxed at rate	Tax generated at rate	Number of returns	Income taxed at rate	Tax generated at rate
	(26)	(27)	(28)	(29)	(30)	(31)	(32)	(33)	(34)
<b>Total</b>	<b>6,488,963</b>	<b>289,593,358</b>	<b>81,086,140</b>	<b>21,483</b>	<b>1,780,356</b>	<b>498,502</b>	<b>2,413,386</b>	<b>233,725,052</b>	<b>77,129,267</b>
Under \$2,000	0	0	0	0	0	0	0	0	0
\$2,000 under \$4,000	0	0	0	0	0	0	0	0	0
\$4,000 under \$6,000	0	0	0	0	0	0	0	0	0
\$6,000 under \$8,000	0	0	0	0	0	0	0	0	0
\$8,000 under \$10,000	0	0	0	0	0	0	0	0	0
\$10,000 under \$12,000	0	0	0	0	0	0	0	0	0
\$12,000 under \$14,000	0	0	0	0	0	0	0	0	0
\$14,000 under \$16,000	0	0	0	0	0	0	0	0	0
\$16,000 under \$18,000	0	0	0	0	0	0	0	0	0
\$18,000 under \$20,000	0	0	0	0	0	0	0	0	0
\$20,000 under \$25,000	0	0	0	0	0	0	0	0	0
\$25,000 under \$30,000	0	0	0	0	0	0	0	0	0
\$30,000 under \$40,000	0	0	0	0	0	0	0	0	0
\$40,000 under \$50,000	0	0	0	0	0	0	0	0	0
\$50,000 under \$75,000	2,003	3,170	888	* 2,005	* 4,474	* 1,254	0	0	0
\$75,000 under \$100,000	177,109	843,046	236,053	* 2,005	* 304	* 85	* 623	* 9,115	* 3,008
\$100,000 under \$200,000	2,387,779	52,590,245	14,725,269	6,980	14,562	4,079	51,496	1,019,473	336,426
\$200,000 under \$500,000	3,159,962	180,936,331	50,662,173	4,876	66,117	18,513	1,614,626	110,742,641	36,545,072
\$500,000 under \$1,000,000	506,618	36,707,211	10,278,019	2,063	40,589	11,365	495,086	80,686,125	26,626,421
\$1,000,000 under \$1,500,000	116,982	8,471,536	2,372,030	906	105,434	29,521	114,893	18,785,630	6,199,258
\$1,500,000 under \$2,000,000	47,344	3,435,277	961,878	512	85,376	23,905	46,636	7,672,587	2,531,954
\$2,000,000 under \$5,000,000	66,155	4,798,322	1,343,530	1,142	408,109	114,271	65,254	10,739,105	3,543,905
\$5,000,000 under \$10,000,000	15,541	1,125,967	315,271	475	354,800	99,344	15,362	2,529,391	834,699
\$10,000,000 or more	9,470	682,253	191,031	519	700,591	196,165	9,410	1,540,985	508,525

Footnotes at end of table.

## Individual Income Tax Rates and Shares, 2010

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**Table 2. All Returns: Tax Generated [1], by Rate and by Size of Adjusted Gross Income, Tax Year 2010—Continued**

[All figures are estimates based on samples—money amounts are in thousands of dollars]

Size of adjusted gross income	Tax generated at specified rate					
	35 percent			Form 8615 [4]		
	Number of returns	Income taxed at rate	Tax generated at rate	Number of returns	Income taxed at rate	Tax generated at rate
	(35)	(36)	(37)	(38)	(39)	(40)
<b>Total</b>	<b>854,212</b>	<b>539,306,690</b>	<b>188,757,342</b>	<b>190,960</b>	<b>2,224,881</b>	<b>508,906</b>
Under \$2,000	0	0	0	1,548	67	11
\$2,000 under \$4,000	0	0	0	45,483	42,529	7,868
\$4,000 under \$6,000	0	0	0	33,487	83,169	16,053
\$6,000 under \$8,000	0	0	0	29,446	115,016	18,176
\$8,000 under \$10,000	0	0	0	22,971	99,688	17,004
\$10,000 under \$12,000	0	0	0	11,263	50,733	5,946
\$12,000 under \$14,000	0	0	0	9,859	64,598	5,955
\$14,000 under \$16,000	0	0	0	6,047	54,658	10,289
\$16,000 under \$18,000	0	0	0	4,655	43,714	9,763
\$18,000 under \$20,000	0	0	0	6,187	85,802	16,367
\$20,000 under \$25,000	0	0	0	5,968	91,151	20,704
\$25,000 under \$30,000	0	0	0	6,109	140,784	26,492
\$30,000 under \$40,000	0	0	0	3,133	70,474	11,981
\$40,000 under \$50,000	0	0	0	1,489	51,576	9,507
\$50,000 under \$75,000	0	0	0	976	60,147	9,022
\$75,000 under \$100,000	0	0	0	0	0	0
\$100,000 under \$200,000	458	4,659	1,631	436	33,434	6,527
\$200,000 under \$500,000	149,510	5,492,175	1,922,261	1,244	356,088	91,452
\$500,000 under \$1,000,000	460,792	90,373,536	31,630,738	424	206,105	71,736
\$1,000,000 under \$1,500,000	110,440	67,851,813	23,748,135	97	106,592	35,587
\$1,500,000 under \$2,000,000	45,192	45,402,640	15,890,924	74	112,903	35,928
\$2,000,000 under \$5,000,000	63,531	121,025,873	42,359,056	40	111,079	34,701
\$5,000,000 under \$10,000,000	15,031	66,801,046	23,380,366	17	106,808	23,700
\$10,000,000 or more	9,259	142,354,949	49,824,232	7	137,766	24,135

\* Estimate should be used with caution because of the small number of sample returns on which it is based.

\*\* Data combined to avoid disclosure of information for specific taxpayers.

[1] For definition of tax generated, see the Explanation of Selected Terms section of this article.

[2] Form 8814 was filed for a dependent child, meeting certain age requirements, for whom the parents made an election to report the child's investment income on the parents' tax return.

[3] The 15 percent capital gains rate also includes qualified dividends.

[4] Form 8615 was filed for a child meeting certain age requirements, to report the child's investment income. The returns in this rate classification are not distributed by tax rate.

NOTE: Detail may not add to totals because of rounding.

# Individual Income Tax Rates and Shares, 2010

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**Table 3. Returns with Modified Taxable Income [1]: Taxable Income and Tax, Classified by Tax Rate and by Filing Status, Tax Year 2010**

[All figures are estimates based on samples—money amounts are in thousands of dollars]

Tax rate classes	All returns			Returns of married persons filing jointly and returns of surviving spouses			Returns of married persons filing separately		
	Number of returns	Income taxed at rate	Income tax generated at rate	Number of returns	Income taxed at rate	Income tax generated at rate	Number of returns	Income taxed at rate	Income tax generated at rate
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)
<b>All tax rates</b>	<b>107,315,923</b>	<b>5,503,672,955</b>	<b>1,037,750,735</b>	<b>44,672,951</b>	<b>3,723,804,323</b>	<b>728,305,790</b>	<b>2,107,983</b>	<b>107,407,714</b>	<b>22,281,897</b>
0 percent (capital gains)	10,423,915	42,853,286	0	6,094,106	28,615,365	0	124,843	668,878	0
10 percent	106,429,109	1,142,853,178	114,285,318	44,372,089	677,418,298	67,741,830	2,093,754	16,215,193	1,621,519
10 percent (Form 8814) [2]	105,334	73,542	7,351	73,687	54,099	5,408	122	139	14
15 percent	78,766,490	2,000,877,397	300,131,609	36,732,075	1,314,913,944	197,237,092	1,767,461	30,365,870	4,554,881
15 percent (capital gains) [3]	11,054,402	372,500,016	55,875,002	7,241,054	280,991,800	42,148,770	165,669	16,152,566	2,422,885
25 percent	29,296,669	873,575,754	218,393,938	15,413,314	578,065,727	144,516,432	716,685	13,263,879	3,315,970
25 percent (capital gains)	190,817	4,309,445	1,077,361	130,732	3,258,668	814,667	1,973	110,592	27,648
28 percent	6,488,963	289,593,358	81,086,140	4,316,074	206,342,283	57,775,839	184,767	4,270,124	1,195,635
28 percent (capital gains)	21,483	1,780,356	498,500	15,837	1,252,842	350,796	114	76,997	21,559
33 percent	2,413,386	233,725,052	77,129,267	1,926,479	189,849,861	62,650,454	72,440	3,871,484	1,277,590
35 percent	854,212	539,306,690	188,757,342	715,195	443,041,436	155,064,503	29,613	22,411,993	7,844,197
Form 8615 [4]	190,960	2,224,881	508,906	0	0	0	0	0	0
Tax rate classes									
Returns of heads of households									
	Number of returns	Income taxed at rate	Income tax generated at rate	Number of returns	Income taxed at rate	Income tax generated at rate			
	(10)	(11)	(12)	(13)	(14)	(15)			
<b>All tax rates</b>	<b>13,616,523</b>	<b>325,119,558</b>	<b>50,915,738</b>	<b>46,918,465</b>	<b>1,347,341,360</b>	<b>236,247,309</b>			
0 percent (capital gains)	395,707	1,022,388	0	3,809,259	12,546,655	0			
10 percent	13,593,053	123,817,979	12,381,798	46,370,213	325,401,709	32,540,171			
10 percent (Form 8814) [2]	26,373	15,836	1,582	5,152	3,468	347			
15 percent	7,586,941	127,224,881	19,083,732	32,680,012	528,372,702	79,255,905			
15 percent (capital gains) [3]	297,323	7,557,390	1,133,608	3,350,357	67,798,260	10,169,739			
25 percent	1,623,162	39,703,377	9,925,844	11,543,507	242,542,770	60,635,693			
25 percent (capital gains)	5,978	94,699	23,675	52,133	845,486	211,371			
28 percent	165,728	7,122,975	1,994,433	1,822,394	71,857,975	20,120,233			
28 percent (capital gains)	74	52,623	14,734	5,458	397,894	111,410			
33 percent	55,872	6,063,114	2,000,827	358,595	33,940,593	11,200,396			
35 percent	20,337	12,444,297	4,355,504	89,067	61,408,965	21,493,138			
Form 8615 [4]	0	0	0	190,960	2,224,881	508,906			

[1] For explanation of modified taxable income, see Income and Tax Concepts section of this article.

[2] Form 8814 was filed for a dependent child, meeting certain age requirements, for whom the parents made an election to report the child's investment income on the parents' tax return.

[3] The 15 percent capital gains rate also includes qualified dividends.

[4] Form 8615 was filed for a child meeting certain age requirements, to report the child's investment income. The returns in this rate classification are not distributed by tax rate.

NOTE: Detail may not add to totals because of rounding.

# Individual Income Tax Rates and Shares, 2010

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**Table 4a. Returns with Modified Taxable Income [1]: Adjusted Gross Income and Tax Items, by Type of Tax Computation, by Size of Adjusted Gross Income, Tax Year 2010**

[All figures are estimates based on samples—money amounts are in thousands of dollars, except where otherwise indicated]

Type of tax computation by size of adjusted gross income	Number of returns	Adjusted gross income less deficit	Modified taxable income	Income tax before credits, regular tax computation		Tax generated	
				Number of returns	Amount	Number of returns	Amount
(1)	(2)	(3)	(4)	(5)	(6)	(7)	
<b>Returns with regular tax computation only [2]</b>							
<b>Total</b>	<b>86,488,650</b>	<b>4,716,374,805</b>	<b>2,981,241,193</b>	<b>86,488,650</b>	<b>496,622,179</b>	<b>86,488,650</b>	<b>496,841,247</b>
Under \$5,000	166,979	396,805	127,460	166,979	12,720	166,979	12,720
\$5,000 under \$10,000	2,353,768	18,991,012	3,506,863	2,353,768	351,116	2,353,768	351,145
\$10,000 under \$15,000	6,174,485	77,145,021	20,852,262	6,174,485	2,092,396	6,174,485	2,094,182
\$15,000 under \$20,000	7,010,606	123,237,517	45,736,787	7,010,606	4,729,258	7,010,606	4,734,858
\$20,000 under \$25,000	7,767,436	174,736,369	70,257,998	7,767,436	7,986,883	7,767,436	7,993,143
\$25,000 under \$30,000	7,447,077	204,296,375	92,858,997	7,447,077	11,014,350	7,447,077	11,021,395
\$30,000 under \$40,000	12,671,837	440,414,563	232,742,508	12,671,837	28,880,574	12,671,837	28,906,312
\$40,000 under \$50,000	9,385,556	419,863,957	246,858,480	9,385,556	32,228,040	9,385,556	32,253,314
\$50,000 under \$75,000	15,000,338	919,793,510	588,187,365	15,000,338	84,720,529	15,000,338	84,791,470
\$75,000 under \$100,000	8,708,601	751,340,971	515,587,194	8,708,601	78,049,696	8,708,601	78,123,363
\$100,000 under \$200,000	8,430,191	1,097,717,018	795,017,326	8,430,191	141,845,378	8,430,191	142,057,936
\$200,000 under \$500,000	1,220,863	332,828,240	254,829,647	1,220,863	62,033,766	1,220,863	62,284,440
\$500,000 under \$1,000,000	115,546	76,679,091	58,785,745	115,546	19,402,475	115,546	19,506,926
\$1,000,000 under \$1,500,000	19,204	23,000,007	17,384,283	19,204	6,343,736	19,204	6,328,075
\$1,500,000 under \$2,000,000	6,500	11,143,312	8,370,342	6,500	3,239,708	6,500	3,223,707
\$2,000,000 under \$5,000,000	7,750	22,402,716	16,277,622	7,750	6,701,361	7,750	6,622,622
\$5,000,000 under \$10,000,000	1,344	9,088,872	6,071,877	1,344	2,785,375	1,344	2,711,961
\$10,000,000 or more	568	13,299,450	7,788,437	568	4,204,819	568	3,823,677
<b>Returns with Form 8615 tax computation [3]</b>							
<b>Total</b>	<b>190,960</b>	<b>3,082,422</b>	<b>2,548,801</b>	<b>190,960</b>	<b>528,612</b>	<b>190,960</b>	<b>531,704</b>
Under \$5,000	62,274	207,035	135,898	62,274	13,591	62,274	16,859
\$5,000 under \$10,000	70,660	514,564	356,542	70,660	35,715	70,660	49,874
\$10,000 under \$15,000	22,140	267,826	186,161	22,140	20,061	22,140	17,988
\$15,000 under \$20,000	15,871	270,077	224,519	15,871	27,028	15,871	39,149
\$20,000 under \$25,000	* 5,968	* 135,013	* 119,076	* 5,968	* 15,371	* 5,968	* 23,365
\$25,000 under \$30,000	* 6,109	* 171,522	* 146,508	* 6,109	* 19,411	* 6,109	* 26,702
\$30,000 under \$40,000	* 3,133	* 105,676	* 97,250	* 3,133	* 13,473	* 3,133	* 15,446
\$40,000 under \$50,000	* 1,489	* 64,545	* 51,780	* 1,489	* 7,678	* 1,489	* 9,528
\$50,000 under \$75,000	* 976	* 65,516	* 60,147	* 976	* 11,312	* 976	* 9,022
\$75,000 under \$100,000	0	0	0	0	0	0	0
\$100,000 under \$200,000	* 436	* 65,119	* 33,434	* 436	* 6,960	* 436	* 6,527
\$200,000 under \$500,000	1,244	373,668	356,199	1,244	99,308	1,244	91,452
\$500,000 under \$1,000,000	* 424	* 225,862	* 206,105	* 424	* 62,660	* 424	* 71,736
\$1,000,000 under \$1,500,000	* 97	* 116,605	* 106,592	* 97	* 35,133	* 97	* 35,587
\$1,500,000 under \$2,000,000	* 74	* 125,356	* 112,932	* 74	* 37,864	* 74	* 35,931
\$2,000,000 under \$5,000,000	40	115,960	111,085	40	37,987	40	34,702
\$5,000,000 under \$10,000,000	17	117,620	106,808	17	37,000	17	23,700
\$10,000,000 or more	* 7	* 140,457	* 137,766	* 7	* 48,062	* 7	* 24,135

Footnotes at end of table.

# Individual Income Tax Rates and Shares, 2010

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**Table 4a. Returns with Modified Taxable Income [1]: Adjusted Gross Income and Tax Items, by Type of Tax Computation, by Size of Adjusted Gross Income, Tax Year 2010—Continued**

[All figures are estimates based on samples—money amounts are in thousands of dollars, except where otherwise indicated]

Type of tax computation by size of adjusted gross income	Number of returns	Adjusted gross income less deficit	Modified taxable income	Income tax before credits, regular tax computation		Tax generated	
				Number of returns	Amount	Number of returns	Amount
(1)	(2)	(3)	(4)	(5)	(6)	(7)	
<b>Returns with Schedule D tax computation</b>							
<b>Total</b>	<b>20,619,267</b>	<b>3,207,028,623</b>	<b>2,514,280,634</b>	<b>20,595,090</b>	<b>614,564,771</b>	<b>19,899,565</b>	<b>540,385,308</b>
Under \$5,000	182,417	416,222	129,740	171,843	12,952	57,314	3,141
\$5,000 under \$10,000	150,482	1,153,789	299,419	144,499	29,947	107,858	18,086
\$10,000 under \$15,000	478,616	6,024,704	1,333,548	476,303	134,179	356,579	90,319
\$15,000 under \$20,000	497,880	8,745,834	3,193,816	497,879	327,587	435,458	254,466
\$20,000 under \$25,000	640,303	14,536,257	5,329,094	639,014	602,870	558,357	494,833
\$25,000 under \$30,000	694,243	19,086,799	8,197,306	691,247	968,865	637,554	804,679
\$30,000 under \$40,000	1,423,239	49,846,947	25,530,510	1,423,238	3,114,772	1,355,945	2,694,043
\$40,000 under \$50,000	1,444,530	65,072,352	38,576,201	1,444,521	5,023,838	1,408,150	4,521,381
\$50,000 under \$75,000	3,596,017	223,468,055	146,880,667	3,595,018	21,492,461	3,534,116	19,917,308
\$75,000 under \$100,000	3,055,145	265,277,734	185,345,133	3,055,145	28,287,858	3,021,718	26,427,304
\$100,000 under \$200,000	5,542,097	768,589,345	576,596,465	5,542,095	106,184,785	5,516,607	101,812,803
\$200,000 under \$500,000	2,243,634	650,472,302	524,292,868	2,243,625	126,027,553	2,239,690	118,730,132
\$500,000 under \$1,000,000	426,665	290,383,251	246,614,013	426,664	73,245,073	426,316	67,183,659
\$1,000,000 under \$1,500,000	107,329	129,797,679	113,044,379	107,329	35,927,242	107,278	32,055,617
\$1,500,000 under \$2,000,000	44,836	77,047,513	67,461,758	44,836	21,981,063	44,817	19,394,760
\$2,000,000 under \$5,000,000	65,049	194,481,623	172,263,894	65,049	57,196,205	65,025	48,813,338
\$5,000,000 under \$10,000,000	16,111	110,593,545	98,785,004	16,111	33,336,936	16,109	27,059,437
\$10,000,000 or more	10,674	332,034,673	300,406,818	10,674	100,670,585	10,674	70,110,004

Footnotes at end of table.

# Individual Income Tax Rates and Shares, 2010

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**Table 4a. Returns with Modified Taxable Income [1]: Adjusted Gross Income and Tax Items, by Type of Tax Computation, by Size of Adjusted Gross Income, Tax Year 2010—Continued**

[All figures are estimates based on samples—money amounts are in thousands of dollars, except where otherwise indicated]

Type of tax computation by size of adjusted gross income	Tax differences due to alternative computations	Taxes from special computation		Alternative minimum tax		Income tax before credits	
		Number of returns	Amount	Number of returns	Amount	Number of returns	Amount
(8)	(9)	(10)	(11)	(12)	(13)	(14)	
<b>Returns with regular tax computation only [2]</b>							
<b>Total</b>	<b>0</b>	<b>10,631</b>	<b>15,924</b>	<b>1,452,285</b>	<b>6,071,596</b>	<b>86,488,650</b>	<b>502,928,766</b>
Under \$5,000	0	* 1,001	* 110	0	0	166,979	12,830
\$5,000 under \$10,000	0	0	0	* 1,018	* 728	2,353,768	351,873
\$10,000 under \$15,000	0	0	0	* 2,036	* 230	6,174,485	2,094,412
\$15,000 under \$20,000	0	0	0	* 3,057	* 2,810	7,010,606	4,737,668
\$20,000 under \$25,000	0	0	0	0	0	7,767,436	7,993,143
\$25,000 under \$30,000	0	* 972	* 1,428	* 3	* 28	7,447,077	11,022,852
\$30,000 under \$40,000	0	0	0	* 218	* 533	12,671,837	28,906,846
\$40,000 under \$50,000	0	* 1,007	* 463	* 1,003	* 867	9,385,556	32,254,644
\$50,000 under \$75,000	0	* 1,333	* 107	47,693	41,835	15,000,338	84,833,412
\$75,000 under \$100,000	0	* 4,009	* 11,753	75,249	93,755	8,708,601	78,228,871
\$100,000 under \$200,000	0	* 2,309	* 2,062	422,838	810,919	8,430,191	142,870,917
\$200,000 under \$500,000	0	0	0	830,403	4,330,941	1,220,863	66,615,382
\$500,000 under \$1,000,000	0	0	0	63,534	657,615	115,546	20,164,541
\$1,000,000 under \$1,500,000	0	0	0	3,931	73,575	19,204	6,401,651
\$1,500,000 under \$2,000,000	0	0	0	534	9,249	6,500	3,232,956
\$2,000,000 under \$5,000,000	0	0	0	627	30,521	7,750	6,653,143
\$5,000,000 under \$10,000,000	0	0	0	99	5,677	1,344	2,717,638
\$10,000,000 or more	0	0	0	42	12,310	568	3,835,987
<b>Returns with Form 8615 tax computation [3]</b>							
<b>Total</b>	<b>3,091</b>	<b>0</b>	<b>0</b>	<b>3,768</b>	<b>11,256</b>	<b>190,960</b>	<b>542,959</b>
Under \$5,000	3,268	0	0	0	0	62,274	16,859
\$5,000 under \$10,000	14,159	0	0	0	0	70,660	49,874
\$10,000 under \$15,000	-2,073	0	0	* 1,018	* 76	22,140	18,065
\$15,000 under \$20,000	12,121	0	0	* 1,018	* 936	15,871	40,084
\$20,000 under \$25,000	* 7,995	0	0	0	0	* 5,968	* 23,365
\$25,000 under \$30,000	* 7,292	0	0	0	0	* 6,109	* 26,702
\$30,000 under \$40,000	* 1,973	0	0	* 1,018	* 1,742	* 3,133	* 17,188
\$40,000 under \$50,000	* 1,850	0	0	* 209	* 670	* 1,489	* 10,198
\$50,000 under \$75,000	* -2,290	0	0	0	0	* 976	* 9,022
\$75,000 under \$100,000	0	0	0	0	0	0	0
\$100,000 under \$200,000	* -433	0	0	* 436	* 5,344	* 436	* 11,871
\$200,000 under \$500,000	-7,856	0	0	* 40	* 850	1,244	92,302
\$500,000 under \$1,000,000	* 9,076	0	0	* 12	* 317	* 424	* 72,053
\$1,000,000 under \$1,500,000	* 454	0	0	0	0	* 97	* 35,587
\$1,500,000 under \$2,000,000	* -1,933	0	0	* 8	* 729	* 74	* 36,659
\$2,000,000 under \$5,000,000	-3,286	0	0	0	0	40	34,702
\$5,000,000 under \$10,000,000	-13,300	0	0	* 7	* 592	17	24,292
\$10,000,000 or more	* -23,926	0	0	0	0	* 7	* 24,135

Footnotes at end of table.

# Individual Income Tax Rates and Shares, 2010

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**Table 4a. Returns with Modified Taxable Income [1]: Adjusted Gross Income and Tax Items, by Type of Tax Computation, by Size of Adjusted Gross Income, Tax Year 2010—Continued**

[All figures are estimates based on samples—money amounts are in thousands of dollars, except where otherwise indicated]

Type of tax computation by size of adjusted gross income	Tax differences due to alternative computations	Taxes from special computation		Alternative minimum tax		Income tax before credits	
		Number of returns	Amount	Number of returns	Amount	Number of returns	Amount
	(8)	(9)	(10)	(11)	(12)	(13)	(14)
<b>Returns with Schedule D tax computation</b>							
<b>Total</b>	<b>-74,179,463</b>	<b>4,092</b>	<b>3,947</b>	<b>2,542,169</b>	<b>20,801,774</b>	<b>19,905,796</b>	<b>561,191,029</b>
Under \$5,000	-9,811	0	0	0	0	57,314	3,141
\$5,000 under \$10,000	-11,861	0	0	0	0	107,858	18,086
\$10,000 under \$15,000	-43,860	0	0	* 1,018	* 1,294	356,579	91,613
\$15,000 under \$20,000	-73,121	0	0	0	0	435,458	254,466
\$20,000 under \$25,000	-108,037	* 998	* 160	* 1,240	* 2,317	558,357	497,310
\$25,000 under \$30,000	-164,186	0	0	* 209	* 195	637,554	804,874
\$30,000 under \$40,000	-420,729	0	0	* 1,201	* 176	1,355,945	2,694,218
\$40,000 under \$50,000	-502,457	0	0	* 995	* 6,948	1,408,322	4,528,329
\$50,000 under \$75,000	-1,575,153	0	0	4,808	13,644	3,534,425	19,930,952
\$75,000 under \$100,000	-1,860,554	* 1,000	* 540	23,415	38,695	3,022,243	26,466,539
\$100,000 under \$200,000	-4,371,982	* 2,023	* 3,015	380,873	872,746	5,519,216	102,688,563
\$200,000 under \$500,000	-7,297,421	0	0	1,757,258	11,461,298	2,241,950	130,191,429
\$500,000 under \$1,000,000	-6,061,414	* 43	* 172	295,969	4,174,851	426,599	71,358,683
\$1,000,000 under \$1,500,000	-3,871,625	* 8	* 7	37,467	924,233	107,317	32,979,857
\$1,500,000 under \$2,000,000	-2,586,303	* 16	* 40	12,701	428,950	44,835	19,823,751
\$2,000,000 under \$5,000,000	-8,382,868	0	0	16,958	946,823	65,042	49,760,161
\$5,000,000 under \$10,000,000	-6,277,500	* 3	* 13	4,448	493,614	16,111	27,553,064
\$10,000,000 or more	-30,560,581	0	0	3,609	1,435,989	10,674	71,545,994

Footnotes at end of table.

## Individual Income Tax Rates and Shares, 2010

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**Table 4a. Returns with Modified Taxable Income [1]: Adjusted Gross Income and Tax Items, by Type of Tax Computation, by Size of Adjusted Gross Income, Tax Year 2010—Continued**

[All figures are estimates based on samples—money amounts are in thousands of dollars, except where otherwise indicated]

Type of tax computation by size of adjusted gross income	Total tax credits		Income tax after credits		Total income tax				
	Number of returns	Amount	Number of returns	Amount	Number of returns	Amount	As a percentage of		Average income tax (dollars)
							Modified taxable income	Adjusted gross income	
	(15)	(16)	(17)	(18)	(19)	(20)	(21)	(22)	(23)
<b>Returns with regular tax computation only [2]</b>									
<b>Total</b>	<b>75,060,912</b>	<b>87,024,293</b>	<b>65,617,961</b>	<b>415,904,473</b>	<b>65,617,961</b>	<b>415,904,473</b>	<b>14.0</b>	<b>8.8</b>	<b>4,809</b>
Under \$5,000	* 2,042	* 158	164,937	12,673	164,937	12,673	9.9	3.2	76
\$5,000 under \$10,000	566,171	22,283	1,796,547	329,590	1,796,547	329,590	9.4	1.7	140
\$10,000 under \$15,000	4,526,377	1,239,289	2,784,114	855,123	2,784,114	855,123	4.1	1.1	138
\$15,000 under \$20,000	6,015,383	2,438,161	4,521,917	2,299,507	4,521,917	2,299,507	5.0	1.9	328
\$20,000 under \$25,000	6,957,460	3,592,283	4,298,684	4,400,860	4,298,684	4,400,860	6.3	2.5	567
\$25,000 under \$30,000	6,822,174	4,603,044	4,189,324	6,419,808	4,189,324	6,419,808	6.9	3.1	862
\$30,000 under \$40,000	11,751,826	9,842,646	8,747,850	19,064,200	8,747,850	19,064,200	8.2	4.3	1,504
\$40,000 under \$50,000	8,753,832	9,283,847	7,471,352	22,970,797	7,471,352	22,970,797	9.3	5.5	2,447
\$50,000 under \$75,000	14,116,148	20,667,659	13,450,033	64,165,753	13,450,033	64,165,753	10.9	7.0	4,278
\$75,000 under \$100,000	8,090,029	14,798,709	8,447,187	63,430,162	8,447,187	63,430,162	12.3	8.4	7,284
\$100,000 under \$200,000	7,035,951	14,036,636	8,381,942	128,834,281	8,381,942	128,834,281	16.2	11.7	15,282
\$200,000 under \$500,000	363,650	2,096,435	1,215,076	64,518,946	1,215,076	64,518,946	25.3	19.4	52,847
\$500,000 under \$1,000,000	44,433	1,679,578	114,203	18,484,963	114,203	18,484,963	31.4	24.1	159,979
\$1,000,000 under \$1,500,000	8,113	523,738	18,937	5,877,913	18,937	5,877,913	33.8	25.6	306,078
\$1,500,000 under \$2,000,000	2,850	339,893	6,378	2,893,063	6,378	2,893,063	34.6	26.0	445,087
\$2,000,000 under \$5,000,000	3,476	804,230	7,605	5,848,913	7,605	5,848,913	35.9	26.1	754,698
\$5,000,000 under \$10,000,000	663	403,601	1,317	2,314,037	1,317	2,314,037	38.1	25.5	1,721,754
\$10,000,000 or more	337	652,104	558	3,183,884	558	3,183,884	40.9	23.9	5,605,430
<b>Returns with Form 8615 tax computation [3]</b>									
<b>Total</b>	<b>53,482</b>	<b>11,168</b>	<b>189,308</b>	<b>531,791</b>	<b>189,308</b>	<b>531,791</b>	<b>20.9</b>	<b>17.3</b>	<b>2,785</b>
Under \$5,000	18,552	1,391	61,725	15,468	61,725	15,468	11.4	7.5	248
\$5,000 under \$10,000	16,136	2,015	69,564	47,859	69,564	47,859	13.4	9.3	677
\$10,000 under \$15,000	10,052	605	22,140	17,459	22,140	17,459	9.4	6.5	789
\$15,000 under \$20,000	* 2,403	* 375	15,871	39,710	15,871	39,710	17.7	14.7	2,502
\$20,000 under \$25,000	* 944	* 136	* 5,968	* 23,229	* 5,968	* 23,229	* 19.5	* 17.2	* 3,892
\$25,000 under \$30,000	* 2,036	* 8	* 6,109	* 26,694	* 6,109	* 26,694	* 18.2	* 15.6	* 4,370
\$30,000 under \$40,000	* 1,097	* 326	* 3,133	* 16,863	* 3,133	* 16,863	* 17.3	* 16.0	* 5,382
\$40,000 under \$50,000	* 216	* 227	* 1,489	* 9,971	* 1,489	* 9,971	* 19.3	* 15.4	* 6,696
\$50,000 under \$75,000	0	0	* 976	* 9,022	* 976	* 9,022	* 15.0	* 13.8	* 9,244
\$75,000 under \$100,000	0	0	0	0	0	0	0.0	0.0	0
\$100,000 under \$200,000	* 436	* 70	* 436	* 11,802	* 436	* 11,802	* 35.3	* 18.1	* 27,069
\$200,000 under \$500,000	1,104	667	* 1,239	* 91,635	* 1,239	* 91,635	* 25.7	* 24.5	* 73,662
\$500,000 under \$1,000,000	* 284	* 158	* 424	* 71,894	* 424	* 71,894	* 34.9	* 31.8	* 169,561
\$1,000,000 under \$1,500,000	* 97	* 1,672	* 97	* 33,915	* 97	* 33,915	* 31.8	* 29.1	* 349,639
\$1,500,000 under \$2,000,000	* 74	* 1,342	d	d	d	d	d	d	d
\$2,000,000 under \$5,000,000	* 34	* 1,445	d	d	d	d	d	d	d
\$5,000,000 under \$10,000,000	* 10	* 239	17	24,053	17	24,053	22.5	20.4	1,414,882
\$10,000,000 or more	* 7	* 493	* 7	* 23,643	* 7	* 23,643	* 17.2	* 16.8	* 3,377,571

Footnotes at end of table.

# Individual Income Tax Rates and Shares, 2010

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**Table 4a. Returns with Modified Taxable Income [1]: Adjusted Gross Income and Tax Items, by Type of Tax Computation, by Size of Adjusted Gross Income, Tax Year 2010—Continued**

[All figures are estimates based on samples—money amounts are in thousands of dollars, except where otherwise indicated]

Type of tax computation by size of adjusted gross income	Total tax credits		Income tax after credits		Total income tax				Average income tax (dollars)	
	Number of returns	Amount	Number of returns	Amount	Number of returns	Amount	As a percentage of			
							Modified taxable income	Adjusted gross income		
	(15)	(16)	(17)	(18)	(19)	(20)	(21)	(22)	(23)	
<b>Returns with Schedule D tax computation</b>										
<b>Total</b>	<b>15,584,562</b>	<b>26,504,876</b>	<b>18,648,034</b>	<b>534,686,153</b>	<b>18,648,034</b>	<b>534,689,171</b>	<b>21.3</b>	<b>16.7</b>	<b>25,932</b>	
Under \$5,000	* 8,505	* 105	56,316	3,036	56,316	3,036	2.3	0.7	17	
\$5,000 under \$10,000	15,895	503	100,929	17,583	100,929	17,583	5.9	1.5	117	
\$10,000 under \$15,000	193,491	35,929	215,305	55,684	215,305	55,684	4.2	0.9	116	
\$15,000 under \$20,000	277,899	96,763	357,238	157,703	357,238	157,703	4.9	1.8	317	
\$20,000 under \$25,000	388,041	166,077	413,820	331,233	413,820	331,233	6.2	2.3	517	
\$25,000 under \$30,000	454,124	232,466	495,053	572,408	495,053	572,408	7.0	3.0	825	
\$30,000 under \$40,000	1,066,265	666,410	1,119,618	2,027,808	1,119,618	2,027,808	7.9	4.1	1,425	
\$40,000 under \$50,000	1,114,800	872,707	1,247,461	3,655,622	1,247,461	3,655,622	9.5	5.6	2,531	
\$50,000 under \$75,000	2,948,572	3,186,198	3,311,376	16,744,754	3,311,376	16,744,754	11.4	7.5	4,656	
\$75,000 under \$100,000	2,627,389	3,808,313	2,938,171	22,658,226	2,938,171	22,658,226	12.2	8.5	7,416	
\$100,000 under \$200,000	4,665,597	7,143,047	5,484,780	95,545,516	5,484,780	95,545,516	16.6	12.4	17,240	
\$200,000 under \$500,000	1,328,094	2,041,272	2,238,463	128,150,158	2,238,463	128,150,158	24.4	19.7	57,117	
\$500,000 under \$1,000,000	304,829	1,378,689	425,973	69,979,994	425,973	69,979,994	28.4	24.1	164,016	
\$1,000,000 under \$1,500,000	81,655	811,955	107,154	32,167,902	107,154	32,167,902	28.5	24.8	299,713	
\$1,500,000 under \$2,000,000	35,150	504,029	44,762	19,319,722	44,762	19,319,722	28.6	25.1	430,898	
\$2,000,000 under \$5,000,000	51,658	1,443,232	64,897	48,316,928	64,897	48,319,945	28.0	24.8	742,824	
\$5,000,000 under \$10,000,000	13,396	789,226	16,080	26,763,838	16,080	26,763,839	27.1	24.2	1,661,215	
\$10,000,000 or more	9,203	3,327,955	10,638	68,218,039	10,638	68,218,040	22.7	20.5	6,391,047	

\* Estimate should be used with caution due to the small number of sample returns on which it is based.

d—Data deleted to avoid disclosure of information for specific taxpayers. Deleted data are included in appropriate totals.

[1] For explanation of modified taxable income, see Income and Tax Concepts section of this article.

[2] Includes returns with Schedule J, *Income Averaging for Farmers and Fisherman*, and foreign-earned income tax computations.

[3] For more details on returns with Form 8615 tax computation, see table 4b.

NOTE: Detail may not add to totals because of rounding.

## Individual Income Tax Rates and Shares, 2010

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**Table 4b. Returns with Form 8615 Tax Computation: Tax Items, by Type of Tax Computation, by Size of Adjusted Gross Income, Tax Year 2010**

[All figures are estimates based on samples—money amounts are in thousands of dollars]

Size of adjusted gross income	Number of returns	Income tax before credits, regular tax computation	Tax generated with Schedule D computation [1]	Tax differences due to regular tax computation vs. with Schedule D computation	Tax generated	Tax differences due to Form 8615 computation vs. with Schedule D computation
	(1)	(2)	(3)	(4)	(5)	(6)
<b>Total</b>	<b>190,960</b>	<b>528,612</b>	<b>405,193</b>	<b>-123,419</b>	<b>531,704</b>	<b>126,511</b>
Under \$5,000	62,274	13,591	10,658	-2,933	16,859	6,201
\$5,000 under \$10,000	70,660	35,715	28,848	-6,867	49,874	21,026
\$10,000 under \$15,000	22,140	20,061	13,848	-6,213	17,988	4,140
\$15,000 under \$20,000	15,871	27,028	21,088	-5,940	39,149	18,061
\$20,000 under \$25,000	* 5,968	* 15,371	* 14,833	* -538	* 23,365	* 8,532
\$25,000 under \$30,000	* 6,109	* 19,411	* 12,879	* -6,532	* 26,702	* 13,823
\$30,000 under \$40,000	* 3,133	* 13,473	* 8,398	* -5,075	* 15,446	* 7,048
\$40,000 under \$50,000	* 1,489	* 7,678	* 2,574	* -5,104	* 9,528	* 6,954
\$50,000 under \$75,000	* 976	* 11,312	* 4,043	* -7,269	* 9,022	* 4,979
\$75,000 under \$100,000	0	0	0	0	0	0
\$100,000 under \$200,000	* 436	* 6,960	* 4,616	* -2,344	* 6,527	* 1,911
\$200,000 under \$500,000	1,244	99,308	72,995	-26,313	91,452	18,457
\$500,000 under \$1,000,000	* 424	* 62,660	* 62,176	* -484	* 71,736	* 9,560
\$1,000,000 under \$1,500,000	* 97	* 35,133	* 33,272	* -1,861	* 35,587	* 2,315
\$1,500,000 under \$2,000,000	* 74	* 37,864	* 34,318	* -3,546	* 35,931	* 1,613
\$2,000,000 under \$5,000,000	40	37,987	33,690	-4,297	34,702	1,012
\$5,000,000 under \$10,000,000	17	37,000	23,241	-13,759	23,700	459
\$10,000,000 or more	* 7	* 48,062	* 23,718	* -24,344	* 24,135	* 417

\* Estimate should be used with caution due to the small number of sample returns on which it is based.

[1] For returns that did not have Schedule D worksheet, the regular tax computation was used to calculate tax generated.

NOTE: Form 8615 was filed for a child meeting certain age requirements, to report the child's investment income. Detail may not add to totals because of rounding.

# Individual Income Tax Rates and Shares, 2010

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**Table 5. All Individual Returns Excluding Dependents: Number of Returns, Shares of Adjusted Gross Income (AGI) and Total Income Tax, AGI Floor on Percentiles in Current and Constant Dollars, and Average Tax Rates, by Selected Expanded Descending Cumulative Percentiles of Returns Based on Income Size Using the Definition of AGI for Each Year, Tax Years 2001–2010**

[All figures are estimates based on samples]

Item, tax year	Total	Descending cumulative percentiles					
		Top 0.1 percent	Top 1 percent	Top 5 percent	Top 10 percent	Top 25 percent	Top 50 percent
		(1)	(2)	(3)	(4)	(5)	(6)
<b>Number of returns:</b>							
2001	119,370,886	119,371	1,193,709	5,968,544	11,937,089	29,842,722	59,685,443
2002	119,850,561	119,851	1,198,506	5,992,528	11,985,056	29,962,640	59,925,281
2003	120,758,947	120,759	1,207,589	6,037,947	12,075,895	30,189,737	60,379,474
2004	122,509,974	122,510	1,225,100	6,125,499	12,250,997	30,627,494	61,254,987
2005	124,673,055	124,673	1,246,731	6,233,653	12,467,306	31,168,264	62,336,528
2006	128,441,165	128,441	1,284,412	6,422,058	12,844,117	32,110,291	64,220,583
2007	[1] 132,654,911	132,654	1,326,549	6,632,746	13,265,491	33,163,728	66,327,456
2008	132,891,770	132,892	1,328,918	6,644,589	13,289,177	33,222,943	66,445,885
2009	132,619,936	132,620	1,326,199	6,630,997	13,261,994	33,154,984	66,309,968
2010	135,033,492	135,033	1,350,335	6,751,675	13,503,349	33,758,373	67,516,746
<b>Adjusted gross income floor on percentiles (current dollars):</b>							
2001	N/A	1,393,718	306,635	132,082	96,151	59,026	31,418
2002	N/A	1,245,352	296,194	130,750	95,699	59,066	31,299
2003	N/A	1,317,088	305,939	133,741	97,470	59,896	31,447
2004	N/A	1,617,918	339,993	140,758	101,838	62,794	32,622
2005	N/A	1,938,175	379,261	149,216	106,864	64,821	33,484
2006	N/A	2,124,625	402,603	157,390	112,016	67,291	34,417
2007	N/A	2,251,017	426,439	164,883	116,396	69,559	35,541
2008	N/A	1,867,652	392,513	163,512	116,813	69,813	35,340
2009	N/A	1,469,393	351,968	157,342	114,181	68,216	34,156
2010	N/A	1,634,386	369,691	161,579	116,623	69,126	34,338
<b>Adjusted gross income floor on percentiles (constant dollars): [2]</b>							
2001	N/A	1,028,574	226,299	97,477	70,960	43,562	23,187
2002	N/A	905,052	215,257	95,022	69,549	42,926	22,746
2003	N/A	935,432	217,286	94,987	69,226	42,540	22,335
2004	N/A	1,119,666	235,289	97,410	70,476	43,456	22,576
2005	N/A	1,297,306	253,856	99,877	71,529	43,388	22,412
2006	N/A	1,377,837	261,091	102,069	72,643	43,639	22,320
2007	N/A	1,419,305	268,877	103,962	73,390	43,858	22,409
2008	N/A	1,133,972	238,320	99,279	70,925	42,388	21,457
2009	N/A	895,425	214,484	95,882	69,580	41,570	20,814
2010	N/A	979,848	221,637	96,870	69,918	41,442	20,586
<b>Adjusted gross income (millions of dollars):</b>							
2001	6,116,274	492,437	1,064,928	1,933,563	2,599,650	3,933,186	5,235,273
2002	5,982,260	420,987	960,352	1,812,094	2,472,326	3,811,534	5,114,828
2003	6,156,994	465,594	1,030,178	1,907,837	2,586,777	3,961,657	5,286,949
2004	6,734,554	615,494	1,278,879	2,243,098	2,968,169	4,423,150	5,826,206
2005	7,365,689	783,762	1,560,659	2,623,077	3,400,596	4,940,249	6,412,897
2006	7,969,813	895,044	1,761,119	2,918,422	3,759,733	5,412,038	6,980,130
2007	8,621,963	1,030,091	1,971,021	3,223,396	4,128,240	5,898,437	7,571,084
2008	8,206,158	825,898	1,656,771	2,867,730	3,772,889	5,554,583	7,228,036
2009	7,578,641	601,504	1,304,627	2,439,146	3,317,402	5,057,761	6,678,194
2010	8,039,779	742,989	1,517,146	2,716,199	3,631,364	5,430,952	7,095,680

Footnotes at the end of table.

# Individual Income Tax Rates and Shares, 2010

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**Table 5. All Individual Returns Excluding Dependents: Number of Returns, Shares of Adjusted Gross Income (AGI) and Total Income Tax, AGI Floor on Percentiles in Current and Constant Dollars, and Average Tax Rates, by Selected Expanded Descending Cumulative Percentiles of Returns Based on Income Size Using the Definition of AGI for Each Year, Tax Years 2001–2010—Continued**

[All figures are estimates based on samples]

Item, tax year	Total	Descending cumulative percentiles					
		Top 0.1 percent	Top 1 percent	Top 5 percent	Top 10 percent	Top 25 percent	Top 50 percent
	(1)	(2)	(3)	(4)	(5)	(6)	(7)
<b>Total income tax (millions of dollars): [3]</b>							
2001	884,931	138,735	293,968	462,288	563,525	721,756	841,587
2002	794,282	119,894	262,820	419,871	513,320	656,602	760,808
2003	745,514	114,559	251,146	399,176	483,792	617,015	715,163
2004	829,096	141,937	300,802	467,165	558,007	694,983	797,040
2005	931,693	176,152	361,264	549,068	647,115	792,545	898,262
2006	1,020,438	196,358	401,610	607,088	715,108	872,385	985,657
2007	1,111,872	220,636	442,633	666,021	782,903	952,964	1,074,502
2008	1,028,669	187,200	385,857	597,246	711,873	880,244	996,815
2009	863,486	146,030	313,826	502,274	603,504	749,022	842,286
2010	949,144	169,734	354,810	560,649	670,319	826,796	926,782
<b>Average tax rate (percentage): [4]</b>							
2001	14.47	28.17	27.60	23.91	21.68	18.35	16.08
2002	13.28	28.48	27.37	23.17	20.76	17.23	14.87
2003	12.11	24.60	24.38	20.92	18.70	15.57	13.53
2004	12.31	23.06	23.52	20.83	18.80	15.71	13.68
2005	12.65	22.48	23.15	20.93	19.03	16.04	14.01
2006	12.80	21.94	22.80	20.80	19.02	16.12	14.12
2007	12.90	21.42	22.46	20.66	18.96	16.16	14.19
2008	12.54	22.67	23.29	20.83	18.87	15.85	13.79
2009	11.39	24.28	24.05	20.59	18.19	14.81	12.61
2010	11.81	22.84	23.39	20.64	18.46	15.22	13.06
<b>Adjusted gross income share (percentage):</b>							
2001	100.00	8.05	17.41	31.61	42.50	64.31	85.60
2002	100.00	7.04	16.05	30.29	41.33	63.71	85.50
2003	100.00	7.56	16.73	30.99	42.01	64.34	85.87
2004	100.00	9.14	18.99	33.31	44.07	65.68	86.51
2005	100.00	10.64	21.19	35.61	46.17	67.07	87.06
2006	100.00	11.23	22.10	36.62	47.17	67.91	87.58
2007	100.00	11.95	22.86	37.39	47.88	68.41	87.81
2008	100.00	10.06	20.19	34.95	45.98	67.69	88.08
2009	100.00	7.94	17.21	32.18	43.77	66.74	88.12
2010	100.00	9.24	18.87	33.78	45.17	67.55	88.26
<b>Total income tax share (percentage):</b>							
2001	100.00	15.68	33.22	52.24	63.68	81.56	95.10
2002	100.00	15.09	33.09	52.86	64.63	82.67	95.79
2003	100.00	15.37	33.69	53.54	64.89	82.76	95.93
2004	100.00	17.12	36.28	56.35	67.30	83.82	96.13
2005	100.00	18.91	38.78	58.93	69.46	85.07	96.41
2006	100.00	19.24	39.36	59.49	70.08	85.49	96.59
2007	100.00	19.84	39.81	59.90	70.41	85.71	96.64
2008	100.00	18.20	37.51	58.06	69.20	85.57	96.90
2009	100.00	16.91	36.34	58.17	69.89	86.74	97.54
2010	100.00	17.88	37.38	59.07	70.62	87.11	97.64

N/A—Not applicable.

[1] The total number of returns does not include the returns filed by individuals to only receive the economic stimulus payment and who had no other reason to file.

[2] For Table 5, constant dollars were calculated using the U.S. Bureau of Labor Statistics' consumer price index for urban consumers (CPI-U, 1990=100). For 2010 the CPI-U = 218.056.

[3] Total income tax was the sum of income tax after credits (including the subtraction of the making work pay credit, earned income credit, American opportunity credit, first-time homebuyer credit, adoption credit and the refundable prior-year minimum tax credit) plus the tax from Form 4970.

[4] The average tax rate was computed by dividing total income tax (see footnote 2) by adjusted gross income.

# Individual Income Tax Rates and Shares, 2010

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**Table 6. All Individual Returns Excluding Dependents: Number of Returns, Shares of Adjusted Gross Income (AGI) and Total Income Tax, and Average Tax Rates, by Selected Ascending Cumulative Percentiles of Returns Based on Income Size Using the Definition of AGI for Each Year, Tax Years 2001–2010**

[All figures are estimates based on samples]

Item, tax year	Total	Ascending cumulative percentiles				
		Bottom 50 percent	Bottom 75 percent	Bottom 90 percent	Bottom 95 percent	Bottom 99 percent
	(1)	(2)	(3)	(4)	(5)	(6)
<b>Number of returns:</b>						
2001	119,370,886	59,685,443	89,528,165	107,433,797	113,402,342	118,177,177
2002	119,850,561	59,925,281	89,887,921	107,865,505	113,858,033	118,652,055
2003	120,758,947	60,379,474	90,569,210	108,683,052	114,721,000	119,551,358
2004	122,509,974	61,254,987	91,882,481	110,258,977	116,384,475	121,284,874
2005	124,673,055	62,336,528	93,504,791	112,205,750	118,439,402	123,426,324
2006	128,441,165	64,220,583	96,330,874	115,597,049	122,019,107	127,156,753
2007	[1] 132,654,911	66,327,456	99,491,183	119,389,420	126,022,165	131,328,362
2008	132,891,770	66,445,885	99,668,828	119,602,593	126,247,182	131,562,852
2009	132,619,936	66,309,968	99,464,952	119,357,942	125,988,939	131,293,737
2010	135,033,492	67,516,746	101,275,119	121,530,143	128,281,817	133,683,157
<b>Adjusted gross income (millions of dollars):</b>						
2001	6,116,274	881,001	2,183,088	3,516,624	4,182,711	5,051,346
2002	5,982,260	867,431	2,170,726	3,509,933	4,170,166	5,021,907
2003	6,156,994	870,045	2,195,336	3,570,217	4,249,157	5,126,816
2004	6,734,554	908,348	2,311,404	3,766,385	4,491,456	5,455,674
2005	7,365,689	952,792	2,425,440	3,965,094	4,742,612	5,805,030
2006	7,969,813	989,682	2,557,775	4,210,079	5,051,390	6,208,693
2007	8,621,963	1,050,879	2,723,525	4,493,722	5,398,566	6,650,942
2008	8,206,158	978,122	2,651,575	4,433,269	5,338,428	6,549,387
2009	7,578,641	900,447	2,520,880	4,261,239	5,139,495	6,274,014
2010	8,039,779	944,099	2,608,826	4,408,415	5,323,580	6,522,633
<b>Total income tax (millions of dollars): [2]</b>						
2001	884,931	43,344	163,175	321,406	422,643	590,963
2002	794,282	33,474	137,679	280,962	374,411	531,462
2003	745,514	30,351	128,499	261,722	346,338	494,368
2004	829,096	32,054	134,114	271,089	361,932	528,294
2005	931,693	33,431	139,143	284,578	382,625	570,430
2006	1,020,438	34,781	148,053	305,330	413,350	618,828
2007	1,111,872	37,371	158,909	328,969	445,851	669,239
2008	1,028,669	31,857	148,425	316,797	431,423	642,812
2009	863,486	21,200	114,465	259,982	361,213	549,660
2010	949,144	22,363	122,347	278,824	388,495	594,333
<b>Average tax rate (percentage): [3]</b>						
2001	14.47	4.92	7.47	9.14	10.10	11.70
2002	13.28	3.86	6.34	8.00	8.98	10.58
2003	12.11	3.49	5.85	7.33	8.15	9.64
2004	12.31	3.53	5.80	7.20	8.06	9.68
2005	12.65	3.51	5.74	7.18	8.07	9.83
2006	12.80	3.51	5.79	7.25	8.18	9.97
2007	12.90	3.56	5.83	7.32	8.26	10.06
2008	12.54	3.26	5.60	7.15	8.08	9.81
2009	11.39	2.35	4.54	6.10	7.03	8.76
2010	11.81	2.37	4.69	6.32	7.30	9.11

Footnotes at end of table.

# Individual Income Tax Rates and Shares, 2010

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**Table 6. All Individual Returns Excluding Dependents: Number of Returns, Shares of Adjusted Gross Income (AGI) and Total Income Tax, and Average Tax Rates, by Selected Ascending Cumulative Percentiles of Returns Based on Income Size Using the Definition of AGI for Each Year, Tax Years 2001–2010—Continued**

[All figures are estimates based on samples]

Item, tax year	Total	Ascending cumulative percentiles				
		Bottom 50 percent	Bottom 75 percent	Bottom 90 percent	Bottom 95 percent	Bottom 99 percent
	(1)	(2)	(3)	(4)	(5)	(6)
<b>Adjusted gross income share (percentage):</b>						
2001	100.00	14.40	35.69	57.50	68.39	82.59
2002	100.00	14.50	36.29	58.67	69.71	83.95
2003	100.00	14.13	35.66	57.99	69.01	83.27
2004	100.00	13.49	34.32	55.93	66.69	81.01
2005	100.00	12.94	32.93	53.83	64.39	78.81
2006	100.00	12.42	32.09	52.83	63.38	77.90
2007	100.00	12.19	31.59	52.12	62.61	77.14
2008	100.00	11.92	32.31	54.02	65.05	79.81
2009	100.00	11.88	33.26	56.23	67.82	82.79
2010	100.00	11.74	32.45	54.83	66.22	81.13
<b>Total income tax share (percentage):</b>						
2001	100.00	4.90	18.44	36.32	47.76	66.78
2002	100.00	4.21	17.33	35.37	47.14	66.91
2003	100.00	4.07	17.24	35.11	46.46	66.31
2004	100.00	3.87	16.18	32.70	43.65	63.72
2005	100.00	3.59	14.93	30.54	41.07	61.23
2006	100.00	3.41	14.51	29.92	40.51	60.64
2007	100.00	3.36	14.29	29.59	40.10	60.19
2008	100.00	3.10	14.43	30.80	41.94	62.49
2009	100.00	2.46	13.26	30.11	41.83	63.66
2010	100.00	2.36	12.89	29.38	40.93	62.62

[1] The total number of returns does not include the returns filed by individuals to only receive the economic stimulus payment and who had no other reason to file.

[2] Total income tax was the sum of income tax after credits (including the subtraction of the making work pay credit, earned income credit, American opportunity credit, first-time homebuyer credit, adoption credit and the refundable prior-year minimum tax credit) plus the tax from Form 4970.

[3] The average tax rate was computed by dividing total income tax (see footnote 1) by adjusted gross income.

# Individual Income Tax Rates and Shares, 2010

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**Table 7. All Individual Returns with "1979 Income Concept" Income Excluding Dependents: Number of Returns, Shares of Income and Total Income Tax, Income Floor on Percentiles in Current and Constant Dollars, and Average Tax Rates, by Selected Descending Cumulative Percentiles of Returns Based on Income Size, Tax Years 2001–2010**

[All figures are estimates based on samples]

Item, tax year	Total	Descending cumulative percentiles				
		Top 1 percent	Top 5 percent	Top 10 percent	Top 25 percent	Top 50 percent
	(1)	(2)	(3)	(4)	(5)	(6)
<b>Number of returns:</b>						
2001	119,370,886	1,193,709	5,968,544	11,937,089	29,842,722	59,685,443
2002	119,850,561	1,198,506	5,992,528	11,985,056	29,962,640	59,925,281
2003	120,758,947	1,207,589	6,037,947	12,075,895	30,189,737	60,379,474
2004	122,509,974	1,225,100	6,125,499	12,250,997	30,627,494	61,254,987
2005	124,673,055	1,246,731	6,233,653	12,467,306	31,168,264	62,336,528
2006	128,441,165	1,284,412	6,422,058	12,844,117	32,110,291	64,220,583
2007	[1] 132,654,911	1,326,549	6,632,746	13,265,491	33,163,728	66,327,456
2008	132,891,770	1,328,918	6,644,589	13,289,177	33,222,943	66,445,885
2009	132,619,936	1,326,199	6,630,997	13,261,994	33,154,984	66,309,968
2010	135,033,492	1,350,335	6,751,675	13,503,349	33,758,373	67,516,746
<b>Income floor on percentiles (current dollars):</b>						
2001	N/A	338,608	136,580	97,538	58,195	31,185
2002	N/A	328,275	136,465	97,466	58,491	31,065
2003	N/A	340,175	138,852	99,177	59,298	31,207
2004	N/A	377,837	147,206	104,106	61,878	32,284
2005	N/A	418,709	157,306	109,543	63,929	33,035
2006	N/A	452,917	167,342	114,981	66,401	33,971
2007	N/A	479,542	174,409	119,564	68,487	34,989
2008	N/A	444,522	171,470	119,542	68,594	34,754
2009	N/A	394,632	163,619	115,951	66,785	33,573
2010	N/A	424,734	169,181	118,957	67,412	33,800
<b>Income floor on percentiles (constant dollars): [2]</b>						
2001	N/A	249,895	100,797	71,984	42,948	23,015
2002	N/A	238,572	99,175	70,833	42,508	22,576
2003	N/A	241,602	98,616	70,438	42,115	22,164
2004	N/A	261,479	101,873	72,046	42,822	22,342
2005	N/A	280,260	105,292	73,322	42,790	22,112
2006	N/A	293,720	108,523	74,566	43,062	22,030
2007	N/A	302,359	109,968	75,387	43,182	22,061
2008	N/A	269,898	104,111	72,582	41,648	21,101
2009	N/A	240,483	99,707	70,659	40,698	20,459
2010	N/A	254,637	101,427	71,317	40,415	20,264
<b>Income (millions of dollars):</b>						
2001	6,233,411	1,126,600	2,055,927	2,736,337	4,066,156	5,347,736
2002	6,128,227	1,029,459	1,947,021	2,628,978	3,968,247	5,253,569
2003	6,295,969	1,095,179	2,035,669	2,734,385	4,109,106	5,416,608
2004	6,901,138	1,353,085	2,393,943	3,144,051	4,603,186	5,984,157
2005	7,554,985	1,643,926	2,798,561	3,604,646	5,149,426	6,596,968
2006	8,207,438	1,865,450	3,138,777	4,014,270	5,674,201	7,213,785
2007	8,865,843	2,078,818	3,456,946	4,398,760	6,176,514	7,813,242
2008	8,425,973	1,769,982	3,094,388	4,030,296	5,813,865	7,449,613
2009	7,742,849	1,409,003	2,630,069	3,531,099	5,264,934	6,844,285
2010	8,281,575	1,664,610	2,976,275	3,919,743	5,714,330	7,335,054

Footnotes at end of table.

# Individual Income Tax Rates and Shares, 2010

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**Table 7. All Individual Returns with "1979 Income Concept" Income Excluding Dependents: Number of Returns, Shares of Income and Total Income Tax, Income Floor on Percentiles in Current and Constant Dollars, and Average Tax Rates, by Selected Descending Cumulative Percentiles of Returns Based on Income Size, Tax Years 2001–2010—Continued**

[All figures are estimates based on samples]

Item, tax year	Total	Descending cumulative percentiles				
		Top 1 percent	Top 5 percent	Top 10 percent	Top 25 percent	Top 50 percent
		(1)	(2)	(3)	(4)	(5)
<b>Total income tax (millions of dollars): [3]</b>						
2001	884,931	284,927	455,272	557,726	717,266	840,233
2002	794,282	253,551	411,671	507,083	652,529	759,423
2003	745,514	242,869	392,561	478,771	613,326	713,728
2004	829,096	290,915	459,555	552,298	691,364	795,814
2005	931,693	352,361	540,674	640,865	788,316	896,842
2006	1,020,438	389,673	596,816	707,802	867,486	983,924
2007	1,111,872	429,288	654,793	774,831	947,875	1,072,649
2008	1,028,669	371,962	586,042	703,879	874,955	995,045
2009	863,486	301,881	492,834	595,962	743,117	840,401
2010	949,144	341,053	549,474	662,135	821,104	925,107
<b>Average tax rate (percentage): [4]</b>						
2001	14.20	25.29	22.14	20.38	17.64	15.71
2002	12.96	24.63	21.14	19.29	16.44	14.46
2003	11.84	22.18	19.28	17.51	14.93	13.18
2004	12.01	21.50	19.20	17.57	15.02	13.30
2005	12.33	21.43	19.32	17.78	15.31	13.59
2006	12.43	20.89	19.01	17.63	15.29	13.64
2007	12.54	20.65	18.94	17.61	15.35	13.73
2008	12.21	21.02	18.94	17.46	15.05	13.36
2009	11.15	21.43	18.74	16.88	14.11	12.28
2010	11.46	20.49	18.46	16.89	14.37	12.61
<b>Income share (percentage):</b>						
2001	100.00	18.07	32.98	43.90	65.23	85.79
2002	100.00	16.80	31.77	42.90	64.75	85.73
2003	100.00	17.39	32.33	43.43	65.27	86.03
2004	100.00	19.61	34.69	45.56	66.70	86.71
2005	100.00	21.76	37.04	47.71	68.16	87.32
2006	100.00	22.73	38.24	48.91	69.13	87.89
2007	100.00	23.45	38.99	49.61	69.67	88.13
2008	100.00	21.01	36.72	47.83	69.00	88.41
2009	100.00	18.20	33.97	45.60	68.00	88.39
2010	100.00	20.10	35.94	47.33	69.00	88.57
<b>Total income tax share (percentage):</b>						
2001	100.00	32.20	51.45	63.02	81.05	94.95
2002	100.00	31.92	51.83	63.84	82.15	95.61
2003	100.00	32.58	52.66	64.22	82.27	95.74
2004	100.00	35.09	55.43	66.61	83.39	95.99
2005	100.00	37.82	58.03	68.78	84.61	96.26
2006	100.00	38.19	58.49	69.36	85.01	96.42
2007	100.00	38.61	58.89	69.69	85.25	96.47
2008	100.00	36.16	56.97	68.43	85.06	96.73
2009	100.00	34.96	57.08	69.02	86.06	97.33
2010	100.00	35.93	57.89	69.76	86.51	97.47

N/A—Not applicable.

[1] The total number of returns does not include the returns filed by individuals to only receive the economic stimulus payment and who had no other reason to file.

[2] For Table 7, constant dollars were calculated using the U.S. Bureau of Labor Statistics' consumer price index for urban consumers (CPI-U, 1990=100). For 2010 the CPI-U = 218.056.

[3] Total income tax was the sum of income tax after credits (including the subtraction of the making work pay credit, earned income credit, American opportunity credit, first-time homebuyer credit, adoption credit and the refundable prior-year minimum tax credit) plus the tax from Form 4970.

[4] The average tax rate was computed by dividing total income tax (see footnote 2) by income.

# Individual Income Tax Rates and Shares, 2010

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**Table 8. All Individual Returns with "1979 Income Concept" Income Excluding Dependents: Number of Returns, Shares of Income and Total Income Tax, and Average Tax Rates, by Selected Ascending Cumulative Percentiles of Returns Based on Income Size, Tax Years 2001–2010**

[All figures are estimates based on samples]

Item, tax year	Total	Ascending cumulative percentiles				
		Bottom 50 percent	Bottom 75 percent	Bottom 90 percent	Bottom 95 percent	Bottom 99 percent
	(1)	(2)	(3)	(4)	(5)	(6)
<b>Number of returns:</b>						
2001	119,370,886	59,685,443	89,528,165	107,433,797	113,402,342	118,177,177
2002	119,850,561	59,925,281	89,887,921	107,865,505	113,858,033	118,652,055
2003	120,758,947	60,379,474	90,569,210	108,683,052	114,721,000	119,551,358
2004	122,509,974	61,254,987	91,882,481	110,258,977	116,384,475	121,284,874
2005	124,673,055	62,336,528	93,504,791	112,205,750	118,439,402	123,426,324
2006	128,441,165	64,220,583	96,330,874	115,597,049	122,019,107	127,156,753
2007	[1] 132,654,911	66,327,456	99,491,183	119,389,420	126,022,165	131,328,362
2008	132,891,770	66,445,885	99,668,828	119,602,593	126,247,182	131,562,852
2009	132,619,936	66,309,968	99,464,952	119,357,942	125,988,939	131,293,737
2010	135,033,492	67,516,746	101,275,119	121,530,143	128,281,817	133,683,157
<b>Income (millions of dollars):</b>						
2001	6,233,411	885,674	2,167,255	3,497,074	4,177,484	5,106,811
2002	6,128,227	874,658	2,159,980	3,499,249	4,181,206	5,098,768
2003	6,295,969	879,361	2,186,863	3,561,585	4,260,301	5,200,790
2004	6,901,138	916,982	2,297,953	3,757,088	4,507,195	5,548,053
2005	7,554,985	958,018	2,405,559	3,950,339	4,756,424	5,911,059
2006	8,207,438	993,653	2,533,238	4,193,168	5,068,661	6,341,988
2007	8,865,843	1,052,601	2,689,329	4,467,083	5,408,897	6,787,025
2008	8,425,973	976,360	2,612,108	4,395,677	5,331,585	6,655,991
2009	7,742,849	898,564	2,477,914	4,211,749	5,112,779	6,333,846
2010	8,281,575	946,521	2,567,245	4,361,832	5,305,300	6,616,966
<b>Total income tax (millions of dollars): [2]</b>						
2001	884,931	44,696	167,665	327,205	429,658	600,004
2002	794,282	34,859	141,753	287,199	382,611	540,731
2003	745,514	31,787	132,197	266,743	352,953	502,645
2004	829,096	33,281	137,728	276,798	369,542	538,182
2005	931,693	34,851	143,378	290,829	391,019	579,332
2006	1,020,438	36,515	152,952	312,634	423,622	630,765
2007	1,111,872	39,222	163,996	337,038	457,079	682,584
2008	1,028,669	33,623	153,714	324,790	442,627	656,707
2009	863,486	23,084	120,370	267,525	370,648	561,605
2010	949,144	24,036	128,040	287,009	399,669	608,091
<b>Average tax rate (percentage): [3]</b>						
2001	14.20	5.05	7.74	9.36	10.29	11.75
2002	12.96	3.99	6.56	8.21	9.15	10.61
2003	11.84	3.61	6.05	7.49	8.28	9.66
2004	12.01	3.63	5.99	7.37	8.20	9.70
2005	12.33	3.64	5.96	7.36	8.22	9.80
2006	12.43	3.67	6.04	7.46	8.36	9.95
2007	12.54	3.73	6.10	7.54	8.45	10.06
2008	12.21	3.44	5.88	7.39	8.30	9.87
2009	11.15	2.57	4.86	6.35	7.25	8.87
2010	11.46	2.54	4.99	6.58	7.53	9.19

Footnotes at end of table.

## Individual Income Tax Rates and Shares, 2010

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**Table 8. All Individual Returns with "1979 Income Concept" Income Excluding Dependents: Number of Returns, Shares of Income and Total Income Tax, and Average Tax Rates, by Selected Ascending Cumulative Percentiles of Returns Based on Income Size, Tax Years 2001–2010—Continued**

[All figures are estimates based on samples]

Item, tax year	Total	Ascending cumulative percentiles				
		Bottom 50 percent	Bottom 75 percent	Bottom 90 percent	Bottom 95 percent	Bottom 99 percent
	(1)	(2)	(3)	(4)	(5)	(6)
<b>Income share (percentage):</b>						
2001	100.00	14.21	34.77	56.10	67.02	81.93
2002	100.00	14.27	35.25	57.10	68.23	83.20
2003	100.00	13.97	34.73	56.57	67.67	82.61
2004	100.00	13.29	33.30	54.44	65.31	80.39
2005	100.00	12.68	31.84	52.29	62.96	78.24
2006	100.00	12.11	30.87	51.09	61.76	77.27
2007	100.00	11.87	30.33	50.39	61.01	76.55
2008	100.00	11.59	31.00	52.17	63.28	78.99
2009	100.00	11.61	32.00	54.40	66.03	81.80
2010	100.00	11.43	31.00	52.67	64.06	79.90
<b>Total income tax share (percentage):</b>						
2001	100.00	5.05	18.95	36.98	48.55	67.80
2002	100.00	4.39	17.85	36.16	48.17	68.08
2003	100.00	4.26	17.73	35.78	47.34	67.42
2004	100.00	4.01	16.61	33.39	44.57	64.91
2005	100.00	3.74	15.39	31.22	41.97	62.18
2006	100.00	3.58	14.99	30.64	41.51	61.81
2007	100.00	3.53	14.75	30.31	41.11	61.39
2008	100.00	3.27	14.94	31.57	43.03	63.84
2009	100.00	2.67	13.94	30.98	42.92	65.04
2010	100.00	2.53	13.49	30.24	42.11	64.07

[1] The total number of returns does not include the returns filed by individuals to only receive the economic stimulus payment and who had no other reason to file.

[2] Total income tax was the sum of income tax after credits (including the subtraction of the making work pay credit, earned income credit, American opportunity credit, first-time homebuyer credit, adoption credit and the refundable prior-year minimum tax credit) plus the tax from Form 4970.

[3] The average tax rate was computed by dividing total income tax (see footnote 2) by income.

# Individual Noncash Contributions, 2010

by Pearson Liddell and Janette Wilson\*

For Tax Year 2010, 22.5 million individual taxpay-  
ers who itemized deductions reported \$44.3 bil-  
lion in deductions for noncash charitable contribu-  
tions.<sup>1</sup> Of these taxpayers, 7.3 million reported \$34.9  
billion in deductions for charitable contributions on  
Form 8283, *Noncash Charitable Contributions*. This  
form is used by individual taxpayers when the amount  
of taxpayer deductions for all noncash donations on  
Schedule A, *Itemized Deductions*, exceeds \$500. The  
number of taxpayers filing Form 8283 increased by 9.1  
percent from 6.7 million for Tax Year 2009, and the  
amount claimed for donations increased even more (by  
24.7 percent), from \$28.0 billion in 2009. For both 2009  
and 2010, corporate stock donations represented the  
largest share of total donations, in terms of amounts  
claimed. For 2010, corporate stock donations of \$13.4  
billion, which represented 38.3 percent of all donations  
claimed, increased 37.3 percent from the Tax  
Year 2009 amount of \$9.7 billion. In terms of donation  
recipients, for Tax Year 2010 large organizations

received the most in donations followed by foundations, receiving \$8.9 billion and \$8.7 billion, respectively. Those taxpayers ages 65 and older donated 42.6 percent of all donations, giving \$14.9 billion. For Tax Year 2010, there were no notable tax law changes that affected the deductions allowed for noncash charitable contributions.

## Types of Donation Contributions

As stated above, corporate stock donations accounted for the largest percentage (38.3 percent) of total 2010 noncash donations deducted by taxpayers, followed by clothing donations of \$8.3 billion and household item donations of \$3.3 billion, representing 23.8 percent and 9.3 percent, respectively (Figure A). In contrast, the number of returns with stock donations was only 123.1 thousand, compared to 5.7 million returns with clothing donations and 2.5 million with household item donations. The average corporate stock donation was \$108,485 per return, while the average donation per return for clothing

## Figure A

### Individual Noncash Charitable Contributions: All Returns with Donations Reported on Form 8283, by Donation Type, Tax Year 2010

[Money amounts are in thousands of dollars—average amounts are in whole dollars]

Type of donation	Number of returns [1]	Number of donations	Amount carried to Schedule A	Average amount per return	Average amount per donation	Percentage of number of donations	Percentage of amount carried to Schedule A
All donations	7,286,205	20,508,458	34,898,507	4,790	1,702	100.0	100.0
Corporate stock	123,109	270,729	13,355,479	108,485	49,331	1.3	38.3
Mutual funds	8,327	14,436	1,070,888	128,598	74,180	0.1	3.1
Other investments	3,135	5,000	2,517,785	803,126	503,543	[2]	7.2
Real estate	6,767	7,599	776,156	114,694	102,145	[2]	2.2
Land	7,382	7,565	568,479	77,006	75,145	[2]	1.6
Easements	2,933	3,241	765,539	261,027	236,208	[2]	2.2
Art and collectibles	84,600	109,654	1,055,346	12,475	9,624	0.5	3.0
Food	214,827	328,765	98,722	460	300	1.6	0.3
Clothing	5,695,243	12,892,893	8,303,763	1,458	644	62.9	23.8
Accessories	46,767	59,230	22,816	488	385	0.3	0.1
Electronics	509,750	670,439	453,226	889	676	3.3	1.3
Household items	2,527,796	4,531,854	3,258,405	1,289	719	22.1	9.3
Cars	179,831	182,679	295,287	1,642	1,616	0.9	0.8
Other vehicles	10,840	10,852	94,024	8,674	8,664	0.1	0.3
Services	18,401	28,095	45,274	2,460	1,611	0.1	0.1
Airline tickets and miles	4,392	5,357	3,574	814	667	[2]	[2]
Other [3]	821,024	1,380,067	2,213,743	2,696	1,604	6.7	6.3

[1] Total number of returns does not equal the sum of returns by donation type because a return could have more than one type of donation.

[2] Less than 0.05 percent.

[3] Other donations include donations of intellectual property.

## Individual Noncash Contributions, 2010

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and household items was much smaller, at \$1,458 and \$1,289, respectively. Other investments (excluding stock and mutual funds), had the highest average donation per return of \$803,126 followed by easement donations at just over \$261,000 per return.

The number of taxpayers claiming donations increased 9.1 percent from 6.7 million in Tax Year 2009 to 7.3 million in 2010, and the amount of donations claimed by taxpayers increased 24.7 percent from \$28.0 billion to \$34.9 billion. Corporate stock and clothing donations represented the highest amounts claimed for both Tax Years 2009 and 2010. Donations of corporate stock increased 37.3 percent from \$9.7 billion in Tax Year 2009 to \$13.4 billion in 2010. Clothing donations also increased 9.6 percent, from \$7.6 billion to \$8.3 billion, between Tax Years 2009 and 2010. Donations of household items, which were the third highest donation amount claimed

for Tax Years 2009 and 2010, increased only 1.0 percent to around \$3.3 billion for 2010. Amounts claimed for mutual funds and other investments for 2010 both more than doubled from 2009 levels, increasing from \$0.5 billion to \$1.1 billion for mutual funds and from \$0.9 billion to \$2.5 billion for other investments.

In terms of average donations per return, the overall average amount claimed increased 14.3 percent between Tax Years 2009 and 2010, from \$4,189 to \$4,790 (Figure B).<sup>2</sup> Average corporate stock donations increased between the two tax years from \$86,186 to \$108,485. Average donations of clothing, the next largest group in terms of amount claimed, increased slightly from \$1,452 per return in Tax Year 2009 to \$1,458 in Tax Year 2010. The average per return donation of household items, the third largest donation category, decreased 5.7 percent between Tax Year 2009 and 2010 from \$1,368 to \$1,289.

### Figure B

#### Individual Noncash Charitable Contributions: All Returns with Donations, by Donation Type, Form 8283, Tax Years 2009 and 2010

[Money amounts are in thousands of dollars]

Type of donation	2009			2010			Percentage change	
	Number of returns [1]	Amount carried to Schedule A	Average amount per return	Number of returns [1]	Amount carried to Schedule A	Average amount per return	Number of returns [1]	Amount carried to Schedule A
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	
<b>All donations</b>	<b>6,681,041</b>	<b>27,986,691</b>	<b>4,189</b>	<b>7,286,205</b>	<b>34,898,507</b>	<b>4,790</b>	<b>9.1</b>	<b>24.7</b>
Corporate stock	112,852	9,726,331	86,186	123,109	13,355,479	108,485	9.1	37.3
Mutual funds	4,896	511,148	104,407	8,327	1,070,888	128,598	70.1	109.5
Other investments	3,089	873,535	282,765	3,135	2,517,785	803,126	1.5	188.2
Real estate	2,993	641,822	214,451	6,767	776,156	114,694	126.1	20.9
Land	5,069	937,818	185,017	7,382	568,479	77,006	45.6	-39.4
Easements	2,107	1,018,173	483,240	2,933	765,539	261,027	39.2	-24.8
Art and collectibles	88,593	895,344	10,106	84,600	1,055,346	12,475	-4.5	17.9
Food	205,782	85,326	415	214,827	98,722	460	4.4	15.7
Clothing	5,219,681	7,577,864	1,452	5,695,243	8,303,763	1,458	9.1	9.6
Accessories	65,274	22,296	342	46,767	22,816	488	-28.4	2.3
Electronics	457,843	365,331	798	509,750	453,226	889	11.3	24.1
Household items	2,358,903	3,226,164	1,368	2,527,796	3,258,405	1,289	7.2	1.0
Cars	198,681	265,347	1,336	179,831	295,287	1,642	-9.5	11.3
Other vehicles	7,661	119,468	15,594	10,840	94,024	8,674	41.5	-21.3
Services	23,940	31,031	1,296	18,401	45,274	2,460	-23.1	45.9
Airline tickets and miles	2,500	2,114	846	4,392	3,574	814	75.7	69.1
Other [2]	788,992	1,687,579	2,139	821,024	2,213,743	2,696	4.1	31.2

[1] Total number of returns does not equal the sum of returns by donation type because a return could have more than one type of donation.

[2] Other donations include donations of intellectual property.

## Individual Noncash Contributions, 2010

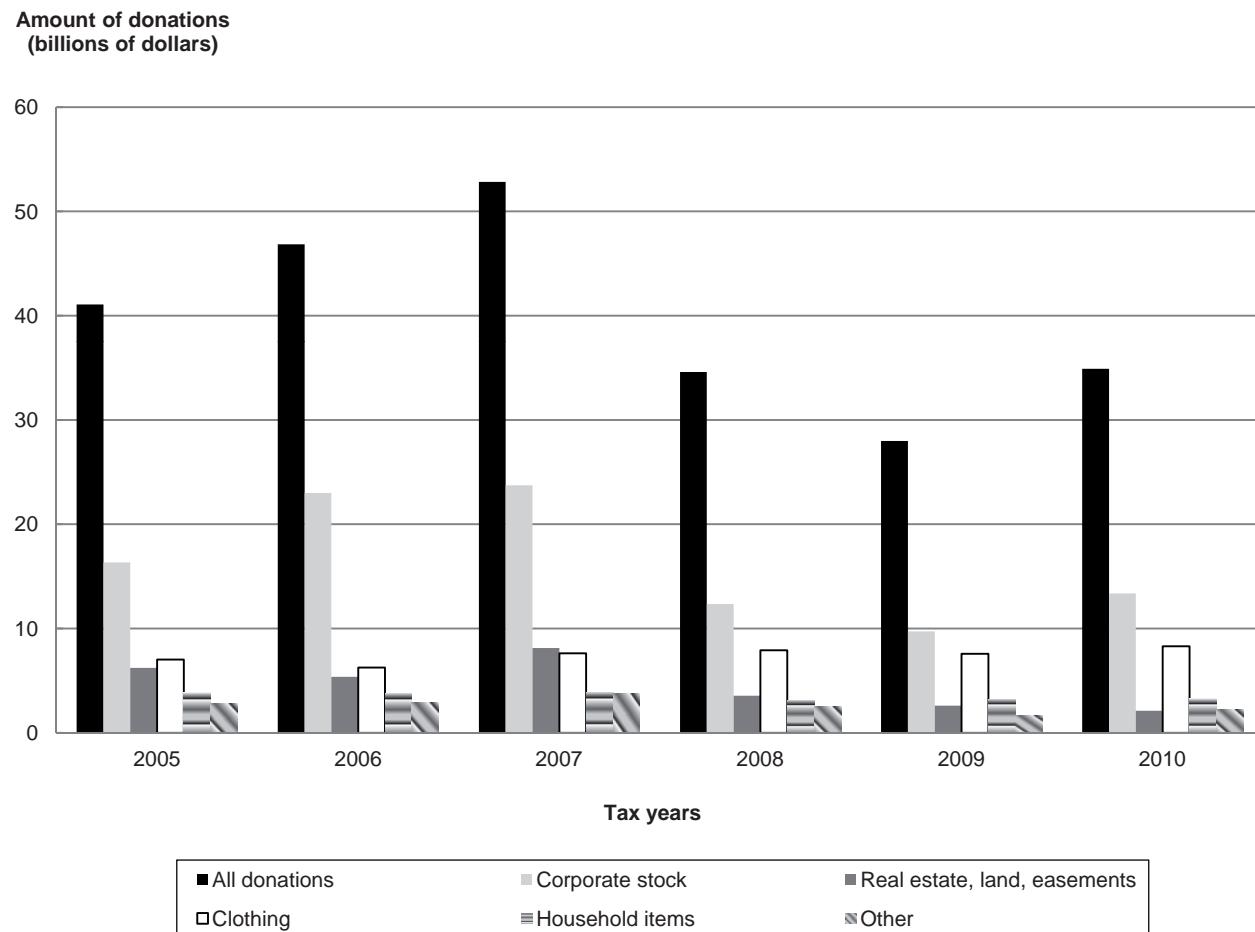
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Taxpayer donations of corporate stock, clothing, and household items have consistently represented the highest amounts of all donations claimed. However, while the amount of clothing and household donations has remained fairly consistent since Tax Year 2005, the amounts deducted for corporate stock declined significantly between Tax Years 2007 and 2009, but increased

significantly in Tax Year 2010 (see Figure C).<sup>3</sup> In Tax Year 2007, taxpayers reported \$23.7 billion in corporate stock donations, and, together, the declines in 2008 and 2009 represented a decrease of 59.1 percent since 2007. For Tax Year 2010, stock donations increased 37.3 percent from the previous year, but were still well below the levels of 2005 through 2007.

### Figure C

Individual Noncash Charitable Contributions: Amount of Donation Reported on Form 8283, by Selected Donation Type, Tax Years 2005–2010



<sup>3</sup> Liddell, Pearson, and Janette Wilson, "Noncash Charitable Contributions, 2009," *Statistics of Income Bulletin*, Spring 2012, IRS Publication 1136, Volume 31, Number 4. See also earlier versions of this article in *Statistics of Income Bulletin*, Winter 2011, Volume 30, Number 3; Spring 2010, Volume 29, Number 4; Summer 2009, Volume 29, Number 1; and Spring 2008, Volume 27, Number 4.

## Individual Noncash Contributions, 2010

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### Donations by Size of Income

Taxpayers with adjusted gross income (AGI) of \$10 million or more who claimed noncash contributions collectively deducted 7.2 percent of their AGI in these contributions, claiming \$10.0 billion on 3,893 Forms 8283 (Figure D). Donations from this group of taxpayers represented 28.8 percent of all individual taxpayer noncash donations reported on Forms 8283 in Tax Year 2010. Taxpayers in the \$100,000 to \$200,000 AGI group gave \$5.4 billion in contributions on 2.6 million tax returns; these

contributions represented 1.5 percent of their AGI and 15.6 percent of all donations claimed. Those taxpayers in the \$200,000 to \$500,000 AGI category gave \$3.3 billion, or 9.5 percent of donations claimed. As stated above, the average donation amount for all taxpayers who claimed noncash donation deductions on Forms 8283 was \$4,790 per return. The highest average amount claimed per return was \$2.6 million by taxpayers with AGI of \$10 million or more, followed by an average donation of around \$578,000 by those in the \$5 million to \$10 million AGI group.

### Figure D

#### Individual Noncash Charitable Contributions: All Returns with Donations Reported on Form 8283, by Size of Adjusted Gross Income, Tax Year 2010

[Money amounts are in thousands of dollars—average amounts are in whole dollars]

Size of adjusted gross income	Number of returns	Percentage of returns	Adjusted gross income (AGI)	Amount carried to Schedule A	Percentage of amount carried to Schedule A	Donation as percentage of AGI	Average donation per return
	(1)	(2)	(3)	(4)	(5)	(6)	(7)
<b>All returns</b>	<b>7,286,205</b>	<b>100.0</b>	<b>1,198,255,062</b>	<b>34,898,507</b>	<b>100.0</b>	<b>2.9</b>	<b>4,790</b>
Under \$5,000 (including deficits)	53,596	0.7	-12,992,224	457,166	1.3	-3.5	8,530
\$5,000 under \$10,000	33,853	0.5	263,809	77,563	0.2	29.4	2,291
\$10,000 under \$15,000	51,195	0.7	662,438	80,893	0.2	12.2	1,580
\$15,000 under \$20,000	74,812	1.0	1,313,000	147,459	0.4	11.2	1,971
\$20,000 under \$25,000	88,691	1.2	2,007,464	190,869	0.5	9.5	2,152
\$25,000 under \$30,000	120,057	1.6	3,324,071	293,762	0.8	8.8	2,447
\$30,000 under \$40,000	315,559	4.3	11,068,462	765,163	2.2	6.9	2,425
\$40,000 under \$50,000	394,993	5.4	17,814,012	748,072	2.1	4.2	1,894
\$50,000 under \$75,000	1,209,630	16.6	75,914,414	2,273,297	6.5	3.0	1,879
\$75,000 under \$100,000	1,280,679	17.6	111,507,919	2,382,821	6.8	2.1	1,861
\$100,000 under \$200,000	2,585,962	35.5	356,247,809	5,441,997	15.6	1.5	2,104
\$200,000 under \$500,000	870,207	11.9	247,235,486	3,319,536	9.5	1.3	3,815
\$500,000 under \$1,000,000	134,372	1.8	91,510,022	1,602,114	4.6	1.8	11,923
\$1,000,000 under \$1,500,000	31,805	0.4	38,328,215	987,259	2.8	2.6	31,041
\$1,500,000 under \$2,000,000	13,035	0.2	22,442,383	1,020,370	2.9	4.5	78,281
\$2,000,000 under \$5,000,000	18,909	0.3	57,139,444	2,201,228	6.3	3.9	116,414
\$5,000,000 under \$10,000,000	4,958	0.1	34,248,452	2,865,131	8.2	8.4	577,857
\$10,000,000 or more	3,893	0.1	140,219,887	10,043,807	28.8	7.2	2,579,966

## Individual Noncash Contributions, 2010

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A comparison of donation amounts by AGI groups across Tax Years 2009 and 2010 is shown in Figure E. With overall donations increasing 24.7 percent between Tax Years 2009 and 2010, most AGI groups showed an increase in the amount of donations reported. There were some exceptions, the most notable being donations claimed by taxpayers in the under \$5,000 AGI groups, whose donation amounts decreased 66.1 percent from \$1.35 billion to \$0.5 billion, almost all of this decrease was for taxpayers with negative AGI. Taxpayers with \$10 million or more in AGI reported donations of \$10 billion, an increase of 74.1 percent from the Tax Year 2009 amount of \$5.8 billion. The noncash contributions of these taxpayers for Tax Year

2010 represented 7.2 percent of their AGI compared to 6.8 percent of their AGI donated in 2009. For both tax years the next largest donation amounts claimed were reported by those taxpayers with an AGI of \$100,000 to \$200,000 and those with an AGI of \$200,000 to \$500,000, respectively. These groups increased their donation amounts from 2009 by 6.3 percent (from \$5.1 billion to \$5.4 billion) and 11.6 percent (from \$3.0 billion to \$3.3 billion). The next largest AGI group for Tax Year 2010 in terms of amount donated was for those taxpayers with an AGI of \$5,000,000 to \$10,000,000. These taxpayers donated \$1.4 billion in 2009 and \$2.9 billion in Tax Year 2010, an increase of 98.9 percent.

### Figure E

#### Individual Noncash Charitable Contributions: All Returns with Donations Reported on Form 8283, by Size of Adjusted Gross Income, Tax Years 2009 and 2010

[Money amounts are in thousands of dollars]

Size of adjusted gross income	2009		2010		Percentage change	
	Number of returns	Amount carried to Schedule A	Number of returns	Amount carried to Schedule A	Number of returns	Amount carried to Schedule A
(1)	(2)	(3)	(4)	(5)	(6)	
<b>All returns</b>	<b>6,681,040</b>	<b>27,986,691</b>	<b>7,286,205</b>	<b>34,898,507</b>	<b>9.1</b>	<b>24.7</b>
Under \$5,000 (including deficits)	58,611	1,349,838	53,596	457,166	-8.6	-66.1
\$5,000 under \$10,000	28,824	43,803	33,853	77,563	17.4	77.1
\$10,000 under \$15,000	53,403	108,313	51,195	80,893	-4.1	-25.3
\$15,000 under \$20,000	69,607	133,662	74,812	147,459	7.5	10.3
\$20,000 under \$25,000	97,447	181,124	88,691	190,869	-9.0	5.4
\$25,000 under \$30,000	98,885	192,454	120,057	293,762	21.4	52.6
\$30,000 under \$40,000	292,644	580,074	315,559	765,163	7.8	31.9
\$40,000 under \$50,000	405,128	827,510	394,993	748,072	-2.5	-9.6
\$50,000 under \$75,000	1,114,098	1,972,793	1,209,630	2,273,297	8.6	15.2
\$75,000 under \$100,000	1,179,941	2,190,585	1,280,679	2,382,821	8.5	8.8
\$100,000 under \$200,000	2,342,053	5,120,086	2,585,962	5,441,997	10.4	6.3
\$200,000 under \$500,000	772,594	2,973,864	870,207	3,319,536	12.6	11.6
\$500,000 under \$1,000,000	110,918	1,577,479	134,372	1,602,114	21.1	1.6
\$1,000,000 under \$1,500,000	24,928	997,495	31,805	987,259	27.6	-1.0
\$1,500,000 under \$2,000,000	10,477	680,101	13,035	1,020,370	24.4	50.0
\$2,000,000 under \$5,000,000	15,061	1,847,278	18,909	2,201,228	25.5	19.2
\$5,000,000 under \$10,000,000	3,845	1,440,556	4,958	2,865,131	29.0	98.9
\$10,000,000 or more	2,576	5,769,676	3,893	10,043,807	51.1	74.1

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### Types of Charitable Organizations

Information on donee organizations is presented in Figures F, G, and H. Figure F shows that, for Tax Year 2010, most donations, in terms of amount claimed, were given to large organizations and foundations (\$8.9 billion and \$8.7 billion, respectively). Between these two, they represented just over half of all donations, with donations to large organizations representing 25.5 percent of the total donation amount and donations to foundations representing 25.0 percent. The largest average donation, \$97,552 per return, was made to foundations, and the

second largest, \$86,981 per return, was made to donor-advised funds. In contrast, the average donation to large organizations was \$1,583 per return, which was the lowest amount in terms of average amount per return of the categories presented in Figure F. Despite having the second largest average donation, donor-advised funds received only 5.1 percent of the total amount deducted by taxpayers on the Schedule A. Donations of \$2.9 billion made to educational institutions were third highest in terms of amount claimed and average donation amount (\$8,169 per return).

### Figure F

#### Individual Noncash Charitable Contributions: All Returns with Donations Reported on Form 8283, by Donee Type, Tax Year 2010

[Money amounts are in thousands of dollars, except average amounts are in whole dollars]

Type of donee	Number of returns [1]	Number of donations	Amount carried to Schedule A	Average amount per return	Average amount per donation	Percent of number of donations	Percent of amount carried to Schedule A
							(7)
<b>All donees</b>	<b>7,286,205</b>	<b>20,508,458</b>	<b>34,898,507</b>	<b>4,790</b>	<b>1,702</b>	<b>100.0</b>	<b>100.0</b>
Arts, culture, and humanities	284,849	395,187	1,499,729	5,265	3,795	1.9	4.3
Educational institutions	360,817	550,563	2,947,477	8,169	5,354	2.7	8.4
Environment and animal related organizations	150,535	219,279	1,101,081	7,314	5,021	1.1	3.2
Health and medical research	934,120	1,592,430	2,747,090	2,941	1,725	7.8	7.9
Large organizations	5,620,773	12,549,930	8,899,950	1,583	709	61.2	25.5
Public and societal benefit	1,485,117	2,533,445	2,537,059	1,708	1,001	12.4	7.3
Religious organizations	1,162,012	1,993,381	2,837,800	2,442	1,424	9.7	8.1
Donor-advised funds	20,287	34,620	1,764,556	86,981	50,970	0.2	5.1
Foundations	89,375	165,800	8,718,688	97,552	52,585	0.8	25.0
Other donees	368,592	473,822	1,845,076	5,006	3,894	2.3	5.3

[1] Total number of returns does not equal the sum of returns by donee type because a return could have donations to more than one type of donee.

Donations to almost all donee types increased between Tax Years 2009 and 2010 (Figures G). Large organizations received the most in terms of amount claimed for Tax Years 2009 and 2010, and these donation amounts increased 10.7 percent from \$8.0 billion to \$8.9 billion. Donations to foundations increased 49.6 percent from \$5.8 billion in Tax Year 2009 to \$8.7 billion in 2010, and these donations, which represented 20.8 percent of all donation amounts in 2009, rose to 25.0 percent in Tax Year 2010. Donations to health and medical research and the arts, culture, and humanities, although only representing 7.9 and 4.3 percent of donations claimed for Tax Year

2010, increased 107.6 percent (from \$1.3 billion to \$2.7 billion) and 73.1 percent (from \$0.9 billion to \$1.5 billion), respectively. One exception to this growth for Tax Year 2010, was donations made to environmental and animal related organizations, which declined 24.2 percent from \$1.5 billion in Tax Year 2009 to \$1.1 billion; these donations represented 5.2 percent of all donations claimed in 2009 and 3.2 percent of all donations in 2010. Donations to donor-advised funds (the only other donee category receiving less in donations) declined 3.2 percent from \$1.8 billion in Tax Year 2009. This category received 6.5 percent of all donations in 2009 and 5.1 percent in 2010.

## Individual Noncash Contributions, 2010

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### Figure G

#### Individual Noncash Charitable Contributions: All Returns with Donations Reported on Form 8283, by Donee Type, Tax Years 2009 and 2010

[Money amounts are in thousands of dollars]

Type of donee	2009		2010		Percentage change	
	Number of returns [1]	Amount carried to Schedule A	Number of returns [1]	Amount carried to Schedule A	Number of returns [1]	Amount carried to Schedule A
	(1)	(2)	(3)	(4)	(5)	(6)
<b>All donees</b>	<b>6,681,041</b>	<b>27,986,691</b>	<b>7,286,205</b>	<b>34,898,507</b>	<b>9.1</b>	<b>24.7</b>
Arts, culture, and humanities	244,424	866,362	284,849	1,499,729	16.5	73.1
Educational institutions	311,887	2,446,016	360,817	2,947,477	15.7	20.5
Environment and animal related organizations	144,534	1,452,864	150,535	1,101,081	4.2	-24.2
Health and medical research	874,814	1,323,123	934,120	2,747,090	6.8	107.6
Large organizations	5,129,365	8,037,084	5,620,773	8,899,950	9.6	10.7
Public and societal benefit	1,381,978	2,429,825	1,485,117	2,537,059	7.5	4.4
Religious organizations	1,106,509	2,417,127	1,162,012	2,837,800	5.0	17.4
Donor-advised funds	16,404	1,822,922	20,287	1,764,556	23.7	-3.2
Foundations	74,282	5,827,187	89,375	8,718,688	20.3	49.6
Other donees	316,275	1,364,182	368,592	1,845,076	16.5	35.3

[1] Total number of returns does not equal the sum of returns by donee type because a return could have donations to more than one type of donee.

Figure H shows that most donee types (educational institutions, environment and animal related organizations, public and societal benefit, religious organizations, donor-advised funds, and donations to other donees) received the most in donations in Tax Year 2007. The other categories except large organizations show an overall

downward trend between Tax Years 2006 through 2009. In addition, all donee types, with the exception of environment and animal related organizations, health and medical research, large organizations, and donor-advised funds received the least donation amounts in Tax Year 2009.

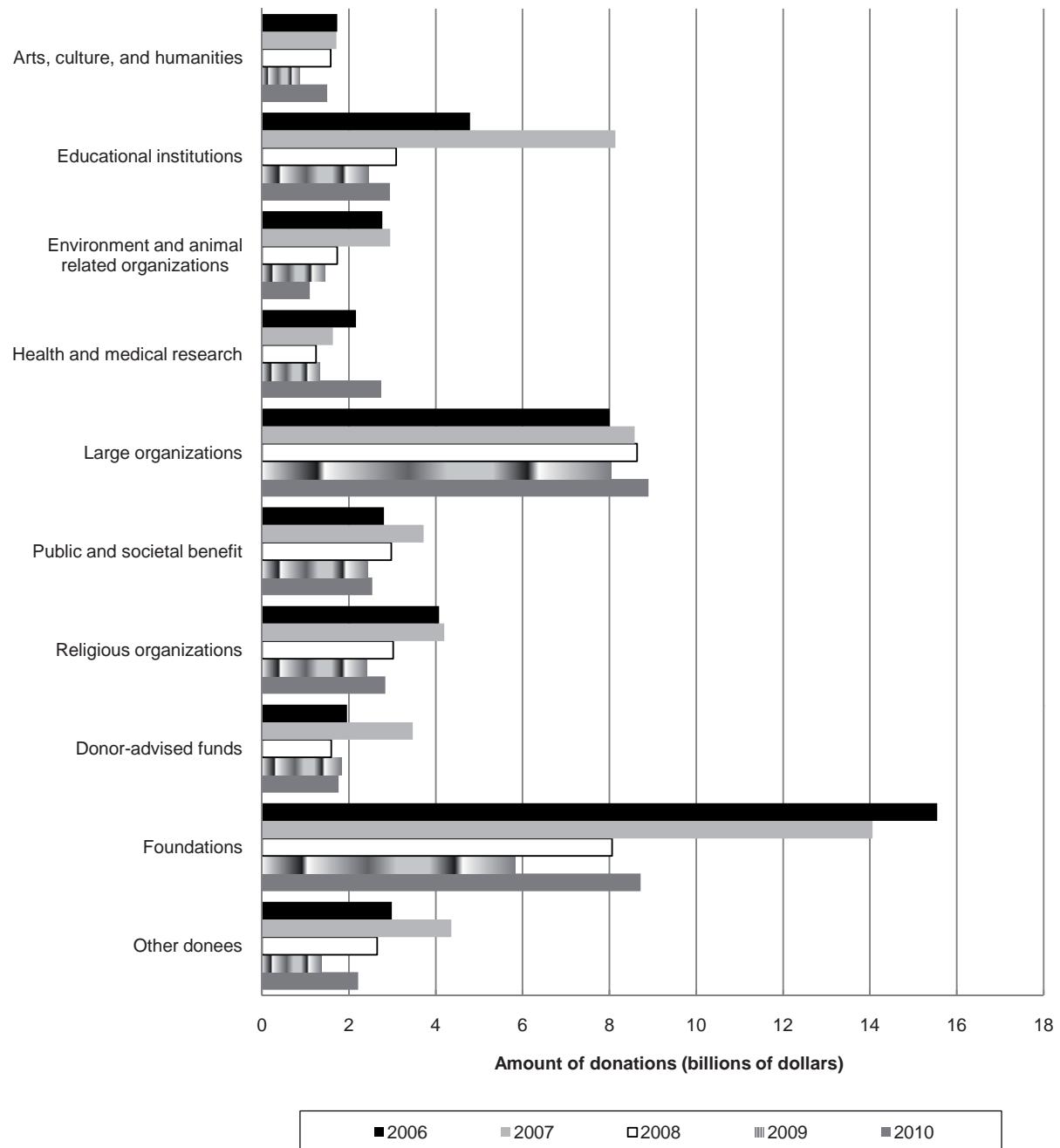
## Individual Noncash Contributions, 2010

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### Figure H

#### Individual Noncash Charitable Contributions: Amount of Donations Reported on Form 8283, by Donee Type, Tax Years 2006–2010

##### Type of donee



# Individual Noncash Contributions, 2010

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## Donations by Age

In comparing donations by different age groups, taxpayers age 65 and older who filed Form 8283 to report their noncash contributions gave the most in terms of the amount reported on Schedule A. This group gave \$9.2 billion in cash contributions (30.6 percent of the total cash contributions of \$30.0 billion given by filers of Form 8283) and \$14.9 billion in noncash contributions on Forms 8283 (42.6 percent of the total noncash contributions of \$34.9 billion reported on Form 8283) in Tax Year 2010. Figure I shows that the average noncash donation amount per return for these taxpayers was \$13,891, which was more than 3 times the average of the next largest group (taxpayers age 55 under 65). In addition, taxpayers in this age group who reported their noncash contributions on Forms 8283 donated 7.9 percent of their AGI of \$188.4 billion in noncash contributions.

Details from Table 4 show that, of the \$14.9 billion in donations made by taxpayers 65 or older, \$10.5 billion (70.5 percent) were donations of corporate stock, mutual funds, and other investments. This represented 61.8 percent of all donations of this type. For these taxpayers, real estate and easement donations were the next largest category, at \$1.1 billion, closely followed by clothing at \$1.0 billion. In addition, taxpayers in this age group donated \$0.7 billion or 69.8 percent of all donations of art and collectibles.

Those taxpayers ages 55 and under 65 years old made noncash donations of \$7.4 billion (2.4 percent of their AGI), with an average per return donation of about \$4,135. Those taxpayers ages 45 and under 55 years old donated slightly less (\$7.0 billion, which was 1.9 percent of their AGI), and their average donation per return was somewhat lower at approximately \$3,468. Taxpayers ages 55 and under 65 years old gave \$8.0 billion in cash donations and those ages 45 and under 55 gave \$7.7 billion in cash donations.

## Figure I

### Individual Cash and Noncash Charitable Contributions: All Returns with Donations Reported on Form 8283, by Age of Donor, Tax Year 2010

[Money amounts are in thousands of dollars—average amounts are in whole dollars]

Donor age	Number of returns	Amount carried to Schedule A	Average amount per return	Adjusted gross income (AGI)	Donation as percentage of AGI	Number of returns with cash contributions on Schedule A	Amount of cash contributions on Schedule A
	(1)	(2)	(3)	(4)	(5)	(6)	(7)
<b>All ages</b>	<b>7,286,205</b>	<b>34,898,507</b>	<b>4,790</b>	<b>1,198,255,062</b>	<b>2.9</b>	<b>6,269,039</b>	<b>30,045,459</b>
Under 35	716,554	1,480,987	2,067	71,666,746	2.1	524,326	1,001,976
35 under 45	1,681,447	4,124,944	2,453	252,673,406	1.6	1,355,559	4,142,396
45 under 55	2,030,769	7,041,707	3,468	375,223,149	1.9	1,785,314	7,725,612
55 under 65	1,787,838	7,393,364	4,135	310,290,725	2.4	1,603,903	7,984,108
65 and older	1,069,597	14,857,504	13,891	188,401,036	7.9	999,938	9,191,367

All age groups donated more in noncash donations in Tax Year 2010 than in 2009 with the exception of those taxpayers under age 35, whose donation amount declined 15.8 percent from \$1.8 billion to \$1.5 billion, as shown in Figure J. Of the 7.3 million returns filed with noncash donation deductions reported on Form 8283 for Tax Year 2010, 14.7 percent (nearly 1.1 million) were filed by those taxpayers 65 and older. Donations by this group increased 44.7 percent between Tax Year 2009 and 2010 from \$10.3 billion to \$14.9 billion. Those taxpayers ages 55 and under 65 years old donated 16.2 percent more in

2010 than 2009 (giving \$6.4 billion in Tax Year 2009 and \$7.4 billion in 2010), and the next largest group, those from the ages of 45 and under 55, increased their donation amount 17.8 percent from \$6.0 billion for 2009. While the average donation amount of those taxpayers from the ages of 55 and under 65 remained almost the same between Tax Year 2009 and 2010, the average donation of taxpayers between the ages of 45 and 55 increased by 11.6 percent and for those over 65 increased even more (by 27.7 percent) from \$10,880 in 2009 to \$13,891 in 2010.

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### Figure J

#### Individual Noncash Charitable Contributions: All Returns with Donations Reported on Form 8283, by Age of Donor, Tax Years 2009 and 2010

[Money amounts are in thousands of dollars]

Donor age	2009			2010			Percentage change	
	Number of returns	Amount carried to Schedule A	Average amount per return	Number of returns	Amount carried to Schedule A	Average amount per return	Number of returns	Amount carried to Schedule A
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
<b>All ages</b>	<b>6,681,041</b>	<b>27,986,691</b>	<b>4,189</b>	<b>7,286,205</b>	<b>34,898,507</b>	<b>4,790</b>	<b>9.1</b>	<b>24.7</b>
Under 35	707,863	1,759,291	2,485	716,554	1,480,987	2,067	1.2	-15.8
35 under 45	1,582,383	3,625,161	2,291	1,681,447	4,124,944	2,453	6.3	13.8
45 under 55	1,922,606	5,976,298	3,108	2,030,769	7,041,707	3,468	5.6	17.8
55 under 65	1,524,675	6,360,333	4,172	1,787,838	7,393,364	4,135	17.3	16.2
65 and older	943,514	10,265,609	10,880	1,069,597	14,857,504	13,891	13.4	44.7

### Explanation of Selected Terms

*Amount carried to Schedule A*—This is the fair market value from Section A of Form 8283 (items with a deduction of \$5,000 or less and certain publicly traded securities) plus the lesser of the fair market value or amount claimed on Section B (items with a deduction of more than \$5,000 except contributions of certain publicly traded securities). The dollar amounts of donations reported in this article reflect the amounts reported on Form 8283 that are carried to Schedule A for reporting itemized deductions.

*Donor's cost*—Also known as the adjusted basis or tax basis, this is generally the amount the owner paid for the property. If the property was received as a gift, the original cost carries over to the recipient of the gift, increased by any gift tax paid on the appreciated portion of the property. If acquired from a decedent, the basis is the fair market value of the property used for estate tax purposes.

*Fair market value*—The fair market value is the value a willing and knowledgeable buyer would pay a seller in a voluntary situation.

*Number of donations*—For this study, data were collected in the manner they were reported by taxpayers. For example, if clothing were listed twice, even though it was given to the same donee organization, it was counted as two separate donations.

*Number of returns*—This is the number of returns to which a Form 8283 was attached in the Individual SOI sample. For this study, all returns with Form 8283 were counted, whether or not the taxpayer carried Form 8283 amounts to Schedule A.

Note that the allowable amount of a noncash deduction depends on whether the property is ordinary income or capital gain property. Ordinary income property is property that, if sold, would generate ordinary income or short-term capital gain. Examples are clothing, household items, inventory, and capital assets held less than a year. Capital gain property results in a long-term gain, if sold. Examples of this are real property used for a taxpayer's business and corporate stock held more than 1 year. The total charitable deduction is generally limited to no more than 50 percent of AGI. This amount can be reduced to 30 percent or 20 percent, depending on the type of property donated and the type of charitable organization. The statistics in this article include the entire deduction amount reported by taxpayers and transcribed from Form 8283 to line 17 of Schedule A. The limitations are then applied to the amount reported on line 19 of that schedule.

### Donated Property Types

*Accessories*—Includes belts, furs, jewelry, purses, scarves, and watches.

*Art and collectibles*—Includes art works, such as ceramics, drawings, paintings, photographs, and sculptures; and collectibles, including coins, books, historical documents, memorabilia, rare or valuable clothing, jewelry, and stamps.

*Cars*—Includes vehicles designed for road transportation, such as cars, buses, motorcycles, motor homes, SUVs, and trucks.

*Clothing*—Includes apparel for children, men, and women, such as coats, dresses, hats, shoes, and suits. Also includes sports and school uniforms.

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*Conservation easements*—Includes land and right-of-way easements. Donations of this type must be a qualified real property interest contributed to a qualified organization for conservation purposes.<sup>4</sup>

*Corporate stock*—Includes shares of publicly traded and closely held common and preferred stock, as well as stock rights.

*Electronics*—Includes cameras, computer systems, copiers, DVD players, fax machines, stereo systems, televisions, telephones, and video games.

*Facade easements*—Includes real estate easements and historical preservation or architectural easements.

*Food*—Includes beverages, individual food items or meals, snacks, restaurant coupons, vitamins, and wine.

*Household items*—Includes appliances, books, exercise equipment, furniture, luggage, tools, and toys.

*Intellectual property*—Includes copyrights, patents, trademarks, trade names, trade secrets, and certain types of software.

*Land*—Includes farms, orchards, and open lots.

*Mutual funds*—Includes shares of taxable and non-taxable mutual funds, exchange-traded funds, and unit investment trusts.

*Other investments*—Includes annuities, bonds, CDs, life insurance policies, notes, options, partnership interests, and real estate investment trusts.

*Other vehicles*—Includes all-terrain vehicles, airplanes, and watercraft vehicles, such as boats, canoes, ships, and water-skis.

*Real estate*—Includes apartments, cabins, houses, and other residential and commercial property.

*Services*—Includes audio presentations, catering, healthcare services, transport and travel expenses, tutoring, and other professional services.

*Other*—Includes animals, building materials, cemetery plots, medical equipment, tickets to events, and donated vacations or use of vacation property.

## Donee Organizations

*Arts, culture, and humanities*—Includes organizations involved with the arts, music, history, and cultural activities, such as museums, libraries, science centers, and theaters.

*Donor-advised funds*—A segregated fund within a public charity that permits the donor to have advisory privileges on distributions or investments. Donations to donor-advised funds may be understated because of the difficulty of identifying all such donations.

*Educational institutions*—Includes organizations whose primary function is educational, such as fraternities, schools (including those with a religious affiliation), scholarship funds, and universities.

*Environmental and animal organizations*—Includes organizations that protect, promote, or seek to improve the environment or welfare of animals, such as local animal shelters, botanical gardens, and garden clubs.

*Foundations*—A foundation is a type of philanthropic organization set up by individuals or institutions as a legal entity (usually either a corporation or trust) with the purpose of distributing grants to support causes in line with the goals of the foundation. For the purpose of this study, this includes private foundations, which are often specific to a person or family, and community foundations.

*Health and medical research*—Includes hospitals, medical associations, nursing homes, and hospices.

*Large organizations*—Includes large national and international organizations that have local chapters, such as Goodwill Industries International, The Salvation Army, United Way International, Habitat for Humanity International, and Boy Scouts of America.

*Other*—Includes all other organizations that are not included in any other category.

*Public or societal benefit*—These are organizations that benefit individuals or communities and do not meet the conditions of other categories such as education, health, and religion. These include homeless shelters, food banks, and political think tanks.

*Religious organizations*—Includes churches, synagogues, and book stores and thrift stores run by religious organizations.

## Data Source and Limitations

These statistics are based on a sample of individual income tax returns (Forms 1040, 1040A, and 1040EZ, including electronically filed returns) filed during Calendar Year 2011. Returns in the sample were stratified based on: (1) the larger of positive income or negative income (absolute value); (2) the size of business and farm receipts; (3) the presence or absence of specific forms or schedules; and (4) the usefulness of returns for tax policy modeling purposes. Returns were then selected at rates ranging from 0.10 percent to 100 percent.

The Tax Year 2010 data are based on a sample of 308,946 returns and an estimated final population of

<sup>4</sup> Notice 2007-50, "Guidance Regarding Deductions by Individuals for Qualified Conservation Contributions," includes a tax law change for conservation contributions such that the 50-percent-of-AGI limitation is increased to 100-percent (the 100-percent limitation) for eligible farmers and ranchers.

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143,170,763 returns.<sup>5</sup> The number of returns in the sample with attached Form 8283 was 39,769.

Since the data presented here are estimates based on a sample of returns filed, they are subject to sampling error. To use the statistical data provided properly, the magnitude of the potential sampling error must be known; coefficients of variation (CVs) are used to measure that magnitude. Figure K shows estimated CVs for the numbers of returns and money amounts for selected

income items. The reliability of estimates based on samples and the use of CVs for evaluating the precision of estimates based on samples are discussed in SOI Sampling Methodology and Data Limitations later in this issue of the *Bulletin*.

\* Pearson Liddell and Janette Wilson are economists with the Individual Research Section. This article was prepared under the direction of Michael Strudler, Chief.

### Figure K

#### Individual Noncash Charitable Contributions: All Returns with Donations Reported on Form 8283, Coefficients of Variation for Selected Items, by Size of Adjusted Gross Income, Tax Year 2010

[Coefficients of variation are in percentages]

Size of adjusted gross income	Number of returns	Donor's cost	Amount carried to Schedule A	Fair market value
				(4)
<b>All returns</b>				
Under \$25,000 (including deficits)	5.36	13.53	5.74	30.03
\$25,000 under \$50,000	3.40	6.33	9.50	9.49
\$50,000 under \$75,000	2.80	5.25	5.51	5.51
\$75,000 under \$100,000	2.70	5.29	4.31	4.31
\$100,000 under \$200,000	1.69	7.21	3.98	4.20
\$200,000 under \$500,000	1.58	3.99	4.70	5.17
\$500,000 under \$1,000,000	2.41	8.47	6.84	9.10
\$1,000,000 under \$1,500,000	2.93	8.63	13.84	28.86
\$1,500,000 under \$2,000,000	2.19	20.08	20.99	22.30
\$2,000,000 under \$5,000,000	1.39	6.10	5.24	16.74
\$5,000,000 under \$10,000,000	1.37	1.57	1.16	1.67
\$10,000,000 or more	0.00	0.00	0.00	0.00

<sup>5</sup> For further details on sampling methodology, see *Statistics of Income—2010, Individual Income Tax Returns* (IRS Publication 1304).

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**Table 1a. Individual Noncash Charitable Contributions: All Returns with Donations Reported on Form 8283, All Donation Types, by Size of Adjusted Gross Income, Tax Year 2010**

[All figures are estimates based on samples—money amounts are in thousands of dollars]

Size of adjusted gross income	All returns with donations				
	Number of returns	Number of donations	Donor's cost [1]	Fair market value	Amount carried to Schedule A [2]
	(1)	(2)	(3)	(4)	(5)
<b>All returns</b>	<b>7,286,205</b>	<b>20,508,458</b>	<b>34,655,551</b>	<b>39,361,731</b>	<b>34,898,507</b>
Under \$25,000 (including deficits)	302,148	655,203	1,474,764	1,457,061	953,950
\$25,000 under \$50,000	830,609	1,905,859	3,315,188	1,808,683	1,806,997
\$50,000 under \$75,000	1,209,630	2,988,159	4,321,029	2,273,308	2,273,297
\$75,000 under \$100,000	1,280,679	3,510,284	4,352,244	2,382,827	2,382,821
\$100,000 under \$200,000	2,585,962	7,949,072	10,793,905	5,550,270	5,441,997
\$200,000 under \$500,000	870,207	2,876,723	5,199,282	3,485,462	3,319,536
\$500,000 under \$1,000,000	134,372	394,772	1,433,600	1,918,308	1,602,114
\$1,000,000 under \$1,500,000	31,805	95,639	486,774	1,997,689	987,259
\$1,500,000 under \$2,000,000	13,035	41,287	408,321	1,260,973	1,020,370
\$2,000,000 under \$5,000,000	18,909	59,387	634,838	2,943,179	2,201,228
\$5,000,000 under \$10,000,000	4,958	16,905	650,494	3,125,458	2,865,131
\$10,000,000 or more	3,893	15,168	1,585,113	11,158,511	10,043,807

Footnotes at end of table 1j.

**Table 1b. Individual Noncash Charitable Contributions: Returns with Donations of Corporate Stock, Mutual Funds, and Other Investments, Reported on Form 8283, by Size of Adjusted Gross Income, Tax Year 2010**

[All figures are estimates based on samples—money amounts are in thousands of dollars]

Size of adjusted gross income	Returns with donations of corporate stock, mutual funds, and other investments				
	Number of returns	Number of donations	Donor's cost [1]	Fair market value	Amount carried to Schedule A [2]
	(1)	(2)	(3)	(4)	(5)
<b>All returns</b>	<b>131,882</b>	<b>290,166</b>	<b>2,830,674</b>	<b>17,769,514</b>	<b>16,944,152</b>
Under \$25,000 (including deficits)	3,977	8,331	70,318	182,168	181,600
\$25,000 under \$50,000	5,309	6,468	3,694	22,384	22,384
\$50,000 under \$75,000	5,035	9,265	13,761	140,337	140,326
\$75,000 under \$100,000	12,929	22,501	28,906	97,125	97,125
\$100,000 under \$200,000	39,629	76,875	133,945	522,265	521,498
\$200,000 under \$500,000	32,046	71,182	208,361	983,433	948,298
\$500,000 under \$1,000,000	13,792	38,477	206,062	857,565	830,446
\$1,000,000 under \$1,500,000	6,182	16,521	134,012	709,274	705,013
\$1,500,000 under \$2,000,000	3,281	8,779	78,230	512,909	512,909
\$2,000,000 under \$5,000,000	5,519	16,678	295,586	1,613,720	1,587,714
\$5,000,000 under \$10,000,000	2,080	6,698	433,018	2,581,166	2,531,796
\$10,000,000 or more	2,103	8,389	1,224,781	9,547,167	8,865,043

Footnotes at end of table 1j.

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**Table 1c. Individual Noncash Charitable Contributions: Returns with Donations of Real Estate and Easements, Reported on Form 8283, by Size of Adjusted Gross Income, Tax Year 2010**

[All figures are estimates based on samples—money amounts are in thousands of dollars]

Size of adjusted gross income	Returns with donations of real estate and easements				
	Number of returns	Number of donations	Donor's cost [1]	Fair market value	Amount carried to Schedule A [2]
	(1)	(2)	(3)	(4)	(5)
<b>All returns</b>	<b>17,055</b>	<b>18,405</b>	<b>1,178,436</b>	<b>5,456,063</b>	<b>2,110,174</b>
Under \$25,000 (including deficits)	1,493	1,575	117,495	615,554	114,585
\$25,000 under \$50,000	* 2,049	* 2,092	* 31,304	* 166,020	* 164,333
\$50,000 under \$75,000	* 144	* 144	* 245	* 495	* 495
\$75,000 under \$100,000	* 2,329	* 2,330	* 18,433	* 69,328	* 69,328
\$100,000 under \$200,000	6,095	6,123	123,494	320,785	216,200
\$200,000 under \$500,000	3,032	3,935	140,653	391,325	274,190
\$500,000 under \$1,000,000	749	887	94,947	386,092	185,459
\$1,000,000 under \$1,500,000	365	383	99,351	1,130,581	122,264
\$1,500,000 under \$2,000,000	164	188	180,989	611,077	372,084
\$2,000,000 under \$5,000,000	372	415	154,212	838,803	209,820
\$5,000,000 under \$10,000,000	121	146	81,457	272,811	121,660
\$10,000,000 or more	143	186	135,854	653,191	259,756

Footnotes at end of table 1j.

**Table 1d. Individual Noncash Charitable Contributions: Returns with Donations of Art and Collectibles Reported on Form 8283, by Size of Adjusted Gross Income, Tax Year 2010**

[All figures are estimates based on samples—money amounts are in thousands of dollars]

Size of adjusted gross income	Returns with donations of art and collectibles				
	Number of returns	Number of donations	Donor's cost [1]	Fair market value	Amount carried to Schedule A [2]
	(1)	(2)	(3)	(4)	(5)
<b>All returns</b>	<b>84,600</b>	<b>109,654</b>	<b>451,498</b>	<b>1,275,498</b>	<b>1,055,346</b>
Under \$25,000 (including deficits)	3,350	3,441	8,629	20,315	19,334
\$25,000 under \$50,000	6,075	7,074	2,753	3,130	3,130
\$50,000 under \$75,000	14,792	15,120	57,300	55,625	55,625
\$75,000 under \$100,000	15,151	20,228	30,740	30,463	30,463
\$100,000 under \$200,000	22,943	33,105	48,620	54,043	53,929
\$200,000 under \$500,000	15,666	20,582	45,043	127,871	120,040
\$500,000 under \$1,000,000	4,214	5,228	49,057	182,067	94,278
\$1,000,000 under \$1,500,000	943	2,572	12,216	26,030	26,030
\$1,500,000 under \$2,000,000	361	482	2,358	16,575	15,834
\$2,000,000 under \$5,000,000	717	1,117	35,421	145,438	88,958
\$5,000,000 under \$10,000,000	213	337	39,894	111,020	70,155
\$10,000,000 or more	173	368	119,467	502,921	477,571

Footnotes at end of table 1j.

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**Table 1e. Individual Noncash Charitable Contributions: Returns with Donations of Food Reported on Form 8283, by Size of Adjusted Gross Income, Tax Year 2010**

[All figures are estimates based on samples—money amounts are in thousands of dollars]

Size of adjusted gross income	Returns with donations of food				
	Number of returns	Number of donations	Donor's cost [1]	Fair market value	Amount carried to Schedule A [2]
					(5)
<b>All returns</b>	<b>214,827</b>	<b>328,765</b>	<b>108,375</b>	<b>101,088</b>	<b>98,722</b>
Under \$25,000 (including deficits)	6,327	7,423	2,673	2,166	2,166
\$25,000 under \$50,000	14,037	17,164	5,027	6,259	6,259
\$50,000 under \$75,000	37,217	50,921	8,422	10,638	10,638
\$75,000 under \$100,000	31,770	45,832	5,888	6,994	6,994
\$100,000 under \$200,000	88,172	150,161	44,526	25,380	25,380
\$200,000 under \$500,000	30,810	47,538	25,150	22,859	22,859
\$500,000 under \$1,000,000	3,553	5,006	3,151	2,635	2,635
\$1,000,000 under \$1,500,000	1,147	1,611	1,030	1,071	1,071
\$1,500,000 under \$2,000,000	551	1,188	583	1,226	1,226
\$2,000,000 under \$5,000,000	870	1,301	2,437	6,713	6,304
\$5,000,000 under \$10,000,000	212	378	3,514	4,900	4,900
\$10,000,000 or more	162	242	5,975	10,248	8,291

Footnotes at end of table 1j.

**Table 1f. Individual Noncash Charitable Contributions: Returns with Donations of Clothing and Accessories Reported on Form 8283, by Size of Adjusted Gross Income, Tax Year 2010**

[All figures are estimates based on samples—money amounts are in thousands of dollars]

Size of adjusted gross income	Returns with donations of clothing and accessories				
	Number of returns	Number of donations	Donor's cost [1]	Fair market value	Amount carried to Schedule A [2]
					(5)
<b>All returns</b>	<b>5,703,418</b>	<b>12,952,123</b>	<b>15,601,857</b>	<b>8,326,570</b>	<b>8,326,579</b>
Under \$25,000 (including deficits)	209,320	347,381	559,955	303,594	303,594
\$25,000 under \$50,000	620,534	1,175,107	1,646,850	942,465	942,465
\$50,000 under \$75,000	918,866	1,857,946	2,149,859	1,257,853	1,257,853
\$75,000 under \$100,000	1,045,309	2,378,507	2,555,776	1,482,300	1,482,300
\$100,000 under \$200,000	2,094,839	5,131,264	5,396,203	2,924,187	2,924,187
\$200,000 under \$500,000	680,216	1,780,351	2,495,647	1,151,038	1,151,038
\$500,000 under \$1,000,000	94,406	197,435	513,450	171,757	171,757
\$1,000,000 under \$1,500,000	19,653	41,877	121,245	38,498	38,498
\$1,500,000 under \$2,000,000	7,467	16,467	74,505	15,531	15,531
\$2,000,000 under \$5,000,000	9,778	19,893	63,736	23,474	23,474
\$5,000,000 under \$10,000,000	1,933	3,862	12,908	6,683	6,683
\$10,000,000 or more	1,096	2,033	11,723	9,190	9,199

Footnotes at end of table 1j.

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**Table 1g. Individual Noncash Charitable Contributions: Returns with Donations of Electronics Reported on Form 8283, by Size of Adjusted Gross Income, Tax Year 2010**

[All figures are estimates based on samples—money amounts are in thousands of dollars]

Size of adjusted gross income	Returns with donations of electronics				
	Number of returns	Number of donations	Donor's cost [1]	Fair market value	Amount carried to Schedule A [2]
(1)	(2)	(3)	(4)	(5)	
<b>All returns</b>	<b>509,750</b>	<b>670,439</b>	<b>1,095,634</b>	<b>456,869</b>	<b>453,226</b>
Under \$25,000 (including deficits)	19,360	25,829	25,016	11,429	11,367
\$25,000 under \$50,000	58,497	76,937	124,631	53,398	53,398
\$50,000 under \$75,000	74,871	97,891	201,566	67,004	67,004
\$75,000 under \$100,000	82,190	106,539	159,322	71,482	71,482
\$100,000 under \$200,000	195,173	258,415	345,663	141,965	141,965
\$200,000 under \$500,000	67,111	89,814	189,692	66,391	66,391
\$500,000 under \$1,000,000	8,354	10,051	16,696	6,520	6,520
\$1,000,000 under \$1,500,000	1,877	2,177	8,182	2,168	2,168
\$1,500,000 under \$2,000,000	863	1,072	18,717	27,077	27,077
\$2,000,000 under \$5,000,000	1,038	1,209	3,821	5,599	5,144
\$5,000,000 under \$10,000,000	265	319	1,779	3,534	408
\$10,000,000 or more	150	185	549	303	303

Footnotes at end of table 1j.

**Table 1h. Individual Noncash Charitable Contributions: Returns with Donations of Household Items Reported on Form 8283, by Size of Adjusted Gross Income, Tax Year 2010**

[All figures are estimates based on samples—money amounts are in thousands of dollars]

Size of adjusted gross income	Returns with donations of household items				
	Number of returns	Number of donations	Donor's cost [1]	Fair market value	Amount carried to Schedule A [2]
(1)	(2)	(3)	(4)	(5)	
<b>All returns</b>	<b>2,527,796</b>	<b>4,531,854</b>	<b>8,290,413</b>	<b>3,263,718</b>	<b>3,258,405</b>
Under \$25,000 (including deficits)	118,444	195,241	356,511	169,262	169,003
\$25,000 under \$50,000	281,211	463,948	1,046,457	413,903	413,903
\$50,000 under \$75,000	433,817	717,842	1,344,349	566,547	566,547
\$75,000 under \$100,000	404,422	680,285	1,089,759	456,093	456,093
\$100,000 under \$200,000	893,429	1,691,538	2,732,366	1,062,419	1,059,967
\$200,000 under \$500,000	321,566	640,157	1,275,309	438,823	438,822
\$500,000 under \$1,000,000	52,092	100,255	293,752	97,635	97,635
\$1,000,000 under \$1,500,000	10,430	19,817	62,286	21,736	21,016
\$1,500,000 under \$2,000,000	4,339	8,650	32,592	12,907	12,229
\$2,000,000 under \$5,000,000	5,978	10,555	40,085	15,401	15,324
\$5,000,000 under \$10,000,000	1,303	2,240	8,692	4,073	4,032
\$10,000,000 or more	764	1,326	8,254	4,918	3,835

Footnotes at end of table 1j.

# Individual Noncash Contributions, 2010

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**Table 1i. Individual Noncash Charitable Contributions: Returns with Donations of Cars and Other Vehicles Reported on Form 8283, by Size of Adjusted Gross Income, Tax Year 2010**

[All figures are estimates based on samples—money amounts are in thousands of dollars]

Size of adjusted gross income	Returns with donations of cars and other vehicles				
	Number of returns	Number of donations	Donor's cost [1]	Fair market value	Amount carried to Schedule A [2]
					(5)
<b>All returns</b>	<b>190,622</b>	<b>193,532</b>	<b>2,535,179</b>	<b>399,573</b>	<b>389,312</b>
Under \$25,000 (including deficits)	4,731	4,731	52,705	19,313	19,313
\$25,000 under \$50,000	21,417	21,417	232,556	52,442	52,442
\$50,000 under \$75,000	26,575	26,575	275,796	32,605	32,605
\$75,000 under \$100,000	29,449	29,449	224,154	31,304	31,297
\$100,000 under \$200,000	81,958	84,576	1,342,017	127,644	127,294
\$200,000 under \$500,000	21,440	21,524	259,582	47,220	47,045
\$500,000 under \$1,000,000	3,251	3,342	75,072	30,120	29,726
\$1,000,000 under \$1,500,000	940	1,021	14,352	8,142	8,142
\$1,500,000 under \$2,000,000	252	252	4,396	5,160	5,036
\$2,000,000 under \$5,000,000	413	429	12,486	10,563	11,060
\$5,000,000 under \$10,000,000	102	110	35,412	26,169	17,940
\$10,000,000 or more	93	105	6,654	8,890	7,411

Footnotes at end of table 1j.

**Table 1j. Individual Noncash Charitable Contributions: Returns with Other Donations Reported on Form 8283 [3], by Size of Adjusted Gross Income, Tax Year 2010**

[All figures are estimates based on samples—money amounts are in thousands of dollars]

Size of adjusted gross income	Returns with other donations [3]				
	Number of returns	Number of donations	Donor's cost [1]	Fair market value	Amount carried to Schedule A [2]
					(5)
<b>All returns</b>	<b>836,618</b>	<b>1,413,522</b>	<b>2,563,484</b>	<b>2,312,837</b>	<b>2,262,591</b>
Under \$25,000 (including deficits)	38,157	61,250	281,462	133,260	132,988
\$25,000 under \$50,000	80,905	135,652	221,916	148,683	148,683
\$50,000 under \$75,000	129,979	212,454	269,731	142,204	142,204
\$75,000 under \$100,000	138,168	224,613	239,265	137,738	137,738
\$100,000 under \$200,000	296,481	517,015	627,071	371,581	371,579
\$200,000 under \$500,000	114,546	201,641	559,844	256,501	250,855
\$500,000 under \$1,000,000	21,676	34,090	181,412	183,916	183,658
\$1,000,000 under \$1,500,000	6,492	9,661	34,100	60,189	63,057
\$1,500,000 under \$2,000,000	2,773	4,210	15,953	58,511	58,444
\$2,000,000 under \$5,000,000	4,774	7,789	27,054	283,468	253,431
\$5,000,000 under \$10,000,000	1,392	2,814	33,821	115,102	107,557
\$10,000,000 or more	1,278	2,334	71,855	421,684	412,399

\*Estimates should be used with caution because of the small number of sample returns on which they are based.

[1] Not every donation has a donor cost reported.

[2] Amount carried to Schedule A is the fair market value from Section A of Forms 8283 (items with a deduction of \$5,000 or less and certain publicly traded securities) plus the lesser of the fair market value or the amount claimed on Section B (items with a deduction of more than \$5,000) except contribution of certain publicly traded securities.

[3] Other donations includes intellectual property, services, airline tickets and miles, and other donations.

## Individual Noncash Contributions, 2010

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**Table 2a. Individual Noncash Charitable Contributions: All Donee Organizations Reported on Form 8283, by Size of Adjusted Gross Income, Tax Year 2010**

[All figures are estimates based on samples—money amounts are in thousands of dollars]

Size of adjusted gross income	All donee organizations				
	Number of returns	Number of donations	Donor's cost [1]	Fair market value	Amount carried to Schedule A [2]
			(1)	(2)	(3)
<b>All returns</b>	<b>7,286,205</b>	<b>20,508,458</b>	<b>34,655,551</b>	<b>39,361,731</b>	<b>34,898,507</b>
Under \$25,000 (including deficits)	302,148	655,203	1,474,764	1,457,061	953,950
\$25,000 under \$50,000	830,609	1,905,859	3,315,188	1,808,683	1,806,997
\$50,000 under \$75,000	1,209,630	2,988,159	4,321,029	2,273,308	2,273,297
\$75,000 under \$100,000	1,280,679	3,510,284	4,352,244	2,382,827	2,382,821
\$100,000 under \$200,000	2,585,962	7,949,072	10,793,905	5,550,270	5,441,997
\$200,000 under \$500,000	870,207	2,876,723	5,199,282	3,485,462	3,319,536
\$500,000 under \$1,000,000	134,372	394,772	1,433,600	1,918,308	1,602,114
\$1,000,000 under \$1,500,000	31,805	95,639	486,774	1,997,689	987,259
\$1,500,000 under \$2,000,000	13,035	41,287	408,321	1,260,973	1,020,370
\$2,000,000 under \$5,000,000	18,909	59,387	634,838	2,943,179	2,201,228
\$5,000,000 under \$10,000,000	4,958	16,905	650,494	3,125,458	2,865,131
\$10,000,000 or more	3,893	15,168	1,585,113	11,158,511	10,043,807

Footnotes at end of table 2k.

**Table 2b. Individual Noncash Charitable Contributions: Donee Organizations (Arts, Culture, and Humanities) Reported on Form 8283, by Size of Adjusted Gross Income, Tax Year 2010**

[All figures are estimates based on samples—money amounts are in thousands of dollars]

Size of adjusted gross income	Arts, culture, and humanities				
	Number of returns	Number of donations	Donor's cost [1]	Fair market value	Amount carried to Schedule A [2]
			(1)	(2)	(3)
<b>All returns</b>	<b>284,849</b>	<b>395,187</b>	<b>615,468</b>	<b>1,764,729</b>	<b>1,499,729</b>
Under \$25,000 (including deficits)	13,361	13,763	16,885	15,100	14,863
\$25,000 under \$50,000	17,694	22,080	29,691	13,240	13,240
\$50,000 under \$75,000	48,757	67,581	35,892	28,039	28,039
\$75,000 under \$100,000	38,154	53,369	28,569	25,962	25,962
\$100,000 under \$200,000	106,004	153,683	97,014	83,706	83,641
\$200,000 under \$500,000	45,941	62,009	129,680	159,968	150,868
\$500,000 under \$1,000,000	9,301	12,638	17,984	168,690	81,935
\$1,000,000 under \$1,500,000	2,067	3,781	10,777	36,578	36,212
\$1,500,000 under \$2,000,000	973	1,688	8,221	88,658	88,658
\$2,000,000 under \$5,000,000	1,680	2,789	45,621	188,940	130,478
\$5,000,000 under \$10,000,000	519	966	53,579	141,795	106,056
\$10,000,000 or more	399	838	141,555	814,054	739,778

Footnotes at end of table 2k.

## Individual Noncash Contributions, 2010

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**Table 2c. Individual Noncash Charitable Contributions: Donee Organizations (Educational Institutions) Reported on Form 8283, by Size of Adjusted Gross Income, Tax Year 2010**

[All figures are estimates based on samples—money amounts are in thousands of dollars]

Size of adjusted gross income	Educational institutions				
	Number of returns	Number of donations	Donor's cost [1]	Fair market value	Amount carried to Schedule A [2]
	(1)	(2)	(3)	(4)	(5)
<b>All returns</b>	<b>360,817</b>	<b>550,563</b>	<b>1,204,248</b>	<b>3,074,607</b>	<b>2,947,477</b>
Under \$25,000 (including deficits)	17,972	23,462	54,904	92,647	92,249
\$25,000 under \$50,000	28,786	49,133	58,530	37,042	36,511
\$50,000 under \$75,000	53,411	64,831	94,321	180,229	180,229
\$75,000 under \$100,000	45,064	65,407	36,335	56,822	56,822
\$100,000 under \$200,000	124,484	212,523	173,845	173,781	169,791
\$200,000 under \$500,000	64,150	90,368	188,128	263,052	250,093
\$500,000 under \$1,000,000	14,215	20,708	218,273	290,349	268,546
\$1,000,000 under \$1,500,000	4,554	7,966	33,598	251,952	250,937
\$1,500,000 under \$2,000,000	2,296	3,932	44,774	109,495	93,784
\$2,000,000 under \$5,000,000	3,620	7,050	80,654	417,600	384,935
\$5,000,000 under \$10,000,000	1,216	2,619	65,099	217,630	211,612
\$10,000,000 or more	1,048	2,565	155,786	984,009	951,969

Footnotes at end of table 2k.

**Table 2d. Individual Noncash Charitable Contributions: Donee Organizations (Environmental and Animal-Related Organizations) Reported on Form 8283, by Size of Adjusted Gross Income, Tax Year 2010**

[All figures are estimates based on samples—money amounts are in thousands of dollars]

Size of adjusted gross income	Environment and animal-related organizations				
	Number of returns	Number of donations	Donor's cost [1]	Fair market value	Amount carried to Schedule A [2]
	(1)	(2)	(3)	(4)	(5)
<b>All returns</b>	<b>150,535</b>	<b>219,279</b>	<b>619,872</b>	<b>2,066,709</b>	<b>1,101,081</b>
Under \$25,000 (including deficits)	11,093	11,877	38,971	552,781	66,206
\$25,000 under \$50,000	16,334	28,330	14,621	11,416	11,416
\$50,000 under \$75,000	18,479	31,316	25,890	10,118	10,118
\$75,000 under \$100,000	16,572	19,641	31,345	23,428	23,428
\$100,000 under \$200,000	68,379	99,764	154,068	310,699	232,273
\$200,000 under \$500,000	14,063	20,232	67,780	202,549	149,804
\$500,000 under \$1,000,000	3,015	4,145	36,604	151,931	79,955
\$1,000,000 under \$1,500,000	1,052	1,553	46,357	140,819	87,440
\$1,500,000 under \$2,000,000	419	585	59,799	148,015	143,743
\$2,000,000 under \$5,000,000	695	1,100	45,759	175,526	81,408
\$5,000,000 under \$10,000,000	227	357	36,157	174,950	79,073
\$10,000,000 or more	206	379	62,521	164,478	136,218

Footnotes at end of table 2k.

## Individual Noncash Contributions, 2010

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**Table 2e. Individual Noncash Charitable Contributions: Donee Organizations (Health and Medical Research) Reported on Form 8283, by Size of Adjusted Gross Income, Tax Year 2010**

[All figures are estimates based on samples—money amounts are in thousands of dollars]

Size of adjusted gross income	Health and medical research				
	Number of returns	Number of donations	Donor's cost [1]	Fair market value	Amount carried to Schedule A [2]
			(1)	(2)	(3)
<b>All returns</b>	<b>934,120</b>	<b>1,592,430</b>	<b>2,282,700</b>	<b>2,774,254</b>	<b>2,747,090</b>
Under \$25,000 (including deficits)	33,073	46,850	91,863	48,320	48,069
\$25,000 under \$50,000	85,182	121,549	268,497	107,257	106,102
\$50,000 under \$75,000	135,321	217,716	306,939	140,592	140,592
\$75,000 under \$100,000	159,016	258,019	391,092	160,816	160,816
\$100,000 under \$200,000	365,109	681,755	725,986	357,234	357,218
\$200,000 under \$500,000	126,411	217,498	312,163	175,162	175,155
\$500,000 under \$1,000,000	19,666	31,703	71,867	44,585	44,585
\$1,000,000 under \$1,500,000	4,719	8,300	26,709	41,129	39,584
\$1,500,000 under \$2,000,000	1,831	2,919	9,083	15,182	15,182
\$2,000,000 under \$5,000,000	2,637	4,207	21,598	116,792	119,793
\$5,000,000 under \$10,000,000	656	1,101	25,646	1,242,546	1,238,040
\$10,000,000 or more	498	813	31,257	324,639	301,955

Footnotes at end of table 2k.

**Table 2f. Individual Noncash Charitable Contributions: Donee Organizations (Large Organizations) Reported on Form 8283, by Size of Adjusted Gross Income, Tax Year 2010**

[All figures are estimates based on samples—money amounts are in thousands of dollars]

Size of adjusted gross income	Large organizations				
	Number of returns	Number of donations	Donor's cost [1]	Fair market value	Amount carried to Schedule A [2]
			(1)	(2)	(3)
<b>All returns</b>	<b>5,620,773</b>	<b>12,549,930</b>	<b>18,642,384</b>	<b>8,901,964</b>	<b>8,899,950</b>
Under \$25,000 (including deficits)	205,843	370,681	655,884	319,952	319,952
\$25,000 under \$50,000	639,155	1,237,796	2,177,860	1,076,232	1,076,232
\$50,000 under \$75,000	927,718	1,854,856	2,623,953	1,354,065	1,354,065
\$75,000 under \$100,000	983,867	2,215,381	2,712,607	1,455,563	1,455,563
\$100,000 under \$200,000	2,053,018	4,824,324	6,585,196	3,039,280	3,039,280
\$200,000 under \$500,000	675,776	1,761,615	3,008,200	1,247,565	1,247,520
\$500,000 under \$1,000,000	94,610	199,806	564,992	210,235	209,553
\$1,000,000 under \$1,500,000	20,092	43,074	126,208	53,321	53,320
\$1,500,000 under \$2,000,000	7,730	16,341	79,078	30,009	30,009
\$2,000,000 under \$5,000,000	9,758	19,719	72,333	47,248	47,164
\$5,000,000 under \$10,000,000	2,047	4,168	17,740	27,501	27,480
\$10,000,000 or more	1,159	2,167	18,333	40,993	39,811

Footnotes at end of table 2k.

## Individual Noncash Contributions, 2010

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**Table 2g. Individual Noncash Charitable Contributions: Donee Organizations (Public and Societal Benefit) Reported on Form 8283, by Size of Adjusted Gross Income, Tax Year 2010**

[All figures are estimates based on samples—money amounts are in thousands of dollars]

Size of adjusted gross income	Public and societal benefit				
	Number of returns	Number of donations	Donor's cost [1]	Fair market value	Amount carried to Schedule A [2]
					(1)
<b>All returns</b>	<b>1,485,117</b>	<b>2,533,445</b>	<b>4,193,110</b>	<b>3,013,785</b>	<b>2,537,059</b>
Under \$25,000 (including deficits)	59,468	79,514	211,344	104,559	103,966
\$25,000 under \$50,000	149,104	222,370	434,983	214,647	214,647
\$50,000 under \$75,000	237,219	375,369	725,431	271,201	271,201
\$75,000 under \$100,000	251,445	453,532	477,719	248,137	248,131
\$100,000 under \$200,000	538,421	954,453	1,153,400	615,223	611,836
\$200,000 under \$500,000	199,068	364,217	732,399	392,114	373,472
\$500,000 under \$1,000,000	32,919	54,755	219,635	175,208	144,656
\$1,000,000 under \$1,500,000	7,333	11,578	37,332	44,215	40,958
\$1,500,000 under \$2,000,000	3,271	6,243	28,615	42,308	37,316
\$2,000,000 under \$5,000,000	4,829	7,826	64,394	167,141	139,106
\$5,000,000 under \$10,000,000	1,175	2,020	50,501	81,991	75,773
\$10,000,000 or more	866	1,567	57,358	657,043	275,998

Footnotes at end of table 2k.

**Table 2h. Individual Noncash Charitable Contributions: Donee Organizations (Religious Organizations) Reported on Form 8283, by Size of Adjusted Gross Income, Tax Year 2010**

[All figures are estimates based on samples—money amounts are in thousands of dollars]

Size of adjusted gross income	Religious organizations				
	Number of returns	Number of donations	Donor's cost [1]	Fair market value	Amount carried to Schedule A [2]
					(1)
<b>All returns</b>	<b>1,162,012</b>	<b>1,993,381</b>	<b>3,199,567</b>	<b>3,495,474</b>	<b>2,837,800</b>
Under \$25,000 (including deficits)	48,603	83,406	312,047	107,505	99,815
\$25,000 under \$50,000	113,999	181,746	235,747	301,576	301,576
\$50,000 under \$75,000	182,020	299,257	358,134	213,079	213,079
\$75,000 under \$100,000	204,936	316,688	506,188	279,887	279,887
\$100,000 under \$200,000	426,105	780,290	860,460	573,441	553,591
\$200,000 under \$500,000	147,014	263,961	456,886	409,415	375,228
\$500,000 under \$1,000,000	25,571	43,962	173,511	296,016	246,254
\$1,000,000 under \$1,500,000	5,909	9,803	44,968	69,440	69,440
\$1,500,000 under \$2,000,000	2,822	4,961	77,243	195,046	195,046
\$2,000,000 under \$5,000,000	3,611	6,430	64,896	635,043	126,732
\$5,000,000 under \$10,000,000	815	1,498	27,639	128,269	86,798
\$10,000,000 or more	607	1,379	81,847	286,756	290,354

Footnotes at end of table 2k.

## Individual Noncash Contributions, 2010

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**Table 2i. Individual Noncash Charitable Contributions: Donee Organizations (Donor-Advised Funds) Reported on Form 8283, by Size of Adjusted Gross Income, Tax Year 2010**

[All figures are estimates based on samples—money amounts are in thousands of dollars]

Size of adjusted gross income	Donor-advised funds				
	Number of returns	Number of donations	Donor's cost [1]	Fair market value	Amount carried to Schedule A [2]
					(1)
<b>All returns</b>	<b>20,287</b>	<b>34,620</b>	<b>329,509</b>	<b>1,768,215</b>	<b>1,764,556</b>
Under \$50,000 (including deficits)	434	529	2,262	15,868	15,868
\$50,000 under \$75,000	107	108	132	364	364
\$75,000 under \$100,000	251	569	952	1,452	1,452
\$100,000 under \$200,000	7,329	9,554	14,005	59,534	59,534
\$200,000 under \$500,000	5,360	9,410	46,189	192,135	192,135
\$500,000 under \$1,000,000	2,965	6,629	28,255	164,222	163,583
\$1,000,000 under \$1,500,000	1,135	1,790	27,629	122,124	122,124
\$1,500,000 under \$2,000,000	670	1,261	15,749	65,618	65,618
\$2,000,000 under \$5,000,000	1,113	2,469	51,009	263,209	252,710
\$5,000,000 under \$10,000,000	457	1,001	30,493	164,045	163,080
\$10,000,000 or more	467	1,299	112,834	719,645	728,089

Footnotes at end of table 2k.

**Table 2j. Individual Noncash Charitable Contributions: Donee Organizations (Foundations) Reported on Form 8283, by Size of Adjusted Gross Income, Tax Year 2010**

[All figures are estimates based on samples—money amounts are in thousands of dollars]

Size of adjusted gross income	Foundations				
	Number of returns	Number of donations	Donor's cost [1]	Fair market value	Amount carried to Schedule A [2]
					(1)
<b>All returns</b>	<b>89,375</b>	<b>165,800</b>	<b>1,752,547</b>	<b>8,927,955</b>	<b>8,718,688</b>
Under \$25,000 (including deficits)	3,627	3,806	51,203	95,539	88,239
\$25,000 under \$50,000	3,993	5,025	993	5,996	5,996
\$50,000 under \$75,000	6,122	7,113	10,908	8,821	8,821
\$75,000 under \$100,000	16,433	38,012	14,230	18,705	18,705
\$100,000 under \$200,000	33,294	67,492	89,884	105,291	105,291
\$200,000 under \$500,000	14,954	23,991	82,999	245,183	244,576
\$500,000 under \$1,000,000	4,342	7,342	70,439	204,225	197,019
\$1,000,000 under \$1,500,000	1,778	2,764	65,911	205,548	200,084
\$1,500,000 under \$2,000,000	971	1,583	29,553	280,903	280,903
\$2,000,000 under \$5,000,000	1,940	4,004	168,975	695,668	683,924
\$5,000,000 under \$10,000,000	843	1,928	321,009	819,585	755,186
\$10,000,000 or more	1,079	2,742	846,442	6,242,492	6,129,945

Footnotes at end of table 2k.

## Individual Noncash Contributions, 2010

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**Table 2k. Individual Noncash Charitable Contributions: Donee Organizations (Other) Reported on Form, by Size of Adjusted Gross Income, Tax Year 2010**

[All figures are estimates based on samples—money amounts are in thousands of dollars]

Size of adjusted gross income	Other donee organizations				
	Number of returns	Number of donations	Donor's cost [1]	Fair market value	Amount carried to Schedule A [2]
					(5)
<b>All returns</b>	<b>368,592</b>	<b>473,822</b>	<b>1,816,146</b>	<b>3,574,039</b>	<b>1,845,076</b>
Under \$25,000 (including deficits)	19,983	21,340	39,468	105,320	105,253
\$25,000 under \$50,000	32,403	37,806	94,198	40,745	40,745
\$50,000 under \$75,000	50,647	70,011	139,430	66,801	66,790
\$75,000 under \$100,000	73,169	89,665	153,206	112,057	112,057
\$100,000 under \$200,000	120,962	165,235	940,046	232,082	229,543
\$200,000 under \$500,000	51,279	63,422	174,859	198,319	160,685
\$500,000 under \$1,000,000	10,487	13,084	32,039	212,848	166,028
\$1,000,000 under \$1,500,000	3,560	5,028	67,284	1,032,565	87,161
\$1,500,000 under \$2,000,000	1,396	1,774	56,206	285,741	70,112
\$2,000,000 under \$5,000,000	2,915	3,792	19,599	236,010	234,978
\$5,000,000 under \$10,000,000	878	1,247	22,633	127,146	122,033
\$10,000,000 or more	912	1,419	77,179	924,403	449,690

[1] Not every donation has a donor cost reported.

[2] Amount carried to Schedule A is the fair market value from Section A of Form 8283 (items with a deduction of \$5,000 or less and certain publicly traded securities) plus the lesser of the fair market value or amount claimed on Section B (items with a deduction of more than \$5,000) except contributions of certain publicly traded securities.

## Individual Noncash Contributions, 2010

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**Table 3. Individual Noncash Charitable Contributions: All Returns with Donations Reported on Form 8283, by Donation Types and Donee Types, Tax Year 2010**

[All figures are estimates based on samples—money amounts are in thousands of dollars]

Type of donation	All donees		Arts, culture, and humanities		Educational institutions
	Number of donations	Amount carried to Schedule A [1]	Number of donations	Amount carried to Schedule A [1]	Number of donations
	(1)	(2)	(3)	(4)	(5)
<b>All donations</b>	<b>20,508,458</b>	<b>34,898,507</b>	<b>395,187</b>	<b>1,499,729</b>	<b>550,563</b>
Corporate stock, mutual funds, and other investments	290,166	16,944,152	14,131	503,382	62,810
Real estate and easements	18,405	2,110,174	795	93,829	424
Art and collectibles	109,654	1,055,346	19,968	738,177	22,367
Food	328,765	98,722	5,084	1,178	28,325
Clothing and accessories	12,952,123	8,326,579	61,339	20,952	164,011
Electronics	670,439	453,226	13,208	4,317	18,726
Household items	4,531,854	3,258,405	228,431	84,063	132,903
Cars and other vehicles	193,532	389,312	6,411	13,515	6,579
Other [2]	1,413,522	2,262,591	45,820	40,316	114,419
Type of donation	Educational institutions—continued	Environmental and animal-related organizations		Health and medical research	
	Amount carried to Schedule A [1]	Number of donations	Amount carried to Schedule A [1]	Number of donations	Amount carried to Schedule A [1]
	(6)	(7)	(8)	(9)	(10)
<b>All donations</b>	<b>2,947,477</b>	<b>219,279</b>	<b>1,101,081</b>	<b>1,592,430</b>	<b>2,747,090</b>
Corporate stock, mutual funds, and other investments	2,250,829	11,587	233,535	16,964	1,766,715
Real estate and easements	182,739	3,998	727,426	15	7,217
Art and collectibles	154,961	2,669	5,346	7,128	7,896
Food	8,872	5,244	1,232	4,054	3,665
Clothing and accessories	88,061	82,845	28,872	1,047,259	577,827
Electronics	15,176	8,571	2,308	39,787	21,795
Household items	71,656	46,246	19,244	338,689	212,751
Cars and other vehicles	40,308	3,040	27,347	36,598	39,684
Other [2]	134,875	55,080	55,771	101,937	109,539
Type of donation	Large organizations		Public and societal benefit		Religious organizations
	Number of donations	Amount carried to Schedule A [1]	Number of donations	Amount carried to Schedule A [1]	Number of donations
	(11)	(12)	(13)	(14)	(15)
<b>All donations</b>	<b>12,549,930</b>	<b>8,899,950</b>	<b>2,533,445</b>	<b>2,537,059</b>	<b>1,993,381</b>
Corporate stock, mutual funds, and other investments	16,393	180,464	14,888	389,921	85,444
Real estate and easements	2,197	30,534	3,132	398,466	4,079
Art and collectibles	24,231	22,458	16,838	16,669	9,199
Food	28,942	6,659	125,693	36,711	120,343
Clothing and accessories	8,823,665	5,884,961	1,512,485	914,062	1,031,327
Electronics	430,103	294,381	71,203	46,325	67,988
Household items	2,651,246	2,033,880	546,921	404,327	464,110
Cars and other vehicles	42,278	70,990	59,170	110,516	22,343
Other [2]	530,876	375,622	183,115	220,063	188,549
Type of donation	Religious organizations—continued	Foundations		Other donees [3]	
	Amount carried to Schedule A [1]	Number of donations	Amount carried to Schedule A [1]	Number of donations	Amount carried to Schedule A [1]
	(16)	(17)	(18)	(19)	(20)
<b>All donations</b>	<b>2,837,800</b>	<b>165,800</b>	<b>8,718,688</b>	<b>508,442</b>	<b>3,609,632</b>
Corporate stock, mutual funds, and other investments	1,187,458	29,633	8,356,142	38,317	2,075,705
Real estate and easements	358,662	221	100,953	3,544	210,347
Art and collectibles	64,630	1,536	23,316	5,718	21,894
Food	24,035	2,867	7,968	8,214	8,404
Clothing and accessories	630,545	73,763	39,176	155,429	142,124
Electronics	59,065	7,201	3,615	13,652	6,243
Household items	346,419	36,473	17,591	86,835	68,473
Cars and other vehicles	48,173	3,209	9,323	13,904	29,455
Other [2]	118,814	10,899	160,605	182,828	1,046,987

[1] Amount carried to Schedule A is the fair market value from Section A of Form 8283 (items with a deduction of \$5,000 or less and certain publicly traded securities) plus the lesser of the fair market value or amount claimed on Section B (items with a deduction of more than \$5,000 except for certain publicly traded securities).

[2] Other donations includes intellectual property, services, airline tickets and miles, and other donations.

[3] Other donees includes donor-advised funds.

# Individual Noncash Contributions, 2010

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**Table 4. Individual Noncash Charitable Contributions: All Returns with Donations Reported on Form 8283, by Donation Types and Donor Age, Tax Year 2010**

[All figures are estimates based on samples — money amounts are in thousands of dollars]

Donor age	Total							
	Number of returns	Number of donations	Fair market value	Amount carried to Schedule A [1]	Number of returns with contributions on Schedule A	Amount of contributions on Schedule A	Number of returns with cash contributions on Schedule A	Amount of cash contributions on Schedule A
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
All ages	7,286,205	20,508,458	39,361,731	34,898,507	7,261,402	34,750,637	6,269,039	30,045,459
Under 35	716,554	1,507,358	1,535,742	1,480,987	714,489	1,476,843	524,326	1,001,976
35 under 45	1,681,447	4,600,794	5,177,299	4,124,944	1,676,177	4,104,546	1,355,559	4,142,396
45 under 55	2,030,769	5,775,416	7,561,660	7,041,707	2,025,160	7,015,879	1,785,314	7,725,612
55 under 65	1,787,838	5,275,278	7,926,793	7,393,364	1,781,934	7,351,192	1,603,903	7,984,108
65 and older	1,069,597	3,349,613	17,160,237	14,857,504	1,063,643	14,802,178	999,938	9,191,367
Corporate stock, mutual funds, and other investments								
Donor age	Number of returns	Number of donations	Fair market value	Amount carried to Schedule A [1]	Number of returns	Number of donations	Fair market value	Amount carried to Schedule A [1]
	(9)	(10)	(11)	(12)	(13)	(14)	(15)	(16)
	All ages	131,882	290,166	17,769,514	16,944,152	17,055	17,088	5,456,063
Under 35	2,749	5,498	69,544	68,165	1,471	1,471	103,461	50,816
35 under 45	8,674	19,061	832,605	826,212	1,649	1,654	1,146,615	109,621
45 under 55	21,856	49,630	2,372,663	2,319,827	2,607	2,611	926,712	477,614
55 under 65	30,888	60,088	3,386,322	3,257,410	6,288	6,299	764,328	394,467
65 and older	67,715	155,889	11,108,379	10,472,538	5,040	5,053	2,514,948	1,077,655
Art and collectibles								
Donor age	Number of returns	Number of donations	Fair market value	Amount carried to Schedule A [1]	Number of returns	Number of donations	Fair market value	Amount carried to Schedule A [1]
	(17)	(18)	(19)	(20)	(21)	(22)	(23)	(24)
	All ages	84,600	109,654	1,275,498	1,055,346	214,827	328,765	101,088
Under 35	505	518	3,285	3,285	5,818	5,899	1,535	1,535
35 under 45	10,602	10,992	35,871	35,590	27,869	54,839	15,974	15,974
45 under 55	15,551	22,034	91,296	88,151	58,505	86,043	23,723	23,392
55 under 65	28,636	39,834	195,588	191,565	68,542	106,541	33,671	31,781
65 and older	29,307	36,275	949,459	736,756	54,093	75,443	26,185	26,040
Clothing and accessories								
Donor age	Number of returns	Number of donations	Fair market value	Amount carried to Schedule A [1]	Number of returns	Number of donations	Fair market value	Amount carried to Schedule A [1]
	(25)	(26)	(27)	(28)	(29)	(30)	(31)	(32)
	All ages	5,703,418	12,952,123	8,326,570	8,326,579	509,750	670,439	456,869
Under 35	562,748	1,065,272	860,771	860,771	43,794	47,751	46,622	46,622
35 under 45	1,369,001	3,110,470	2,056,896	2,056,905	107,915	145,985	117,230	117,230
45 under 55	1,622,776	3,791,363	2,465,839	2,465,839	145,688	192,686	122,917	119,790
55 under 65	1,392,929	3,200,597	1,911,467	1,911,467	127,856	178,309	98,602	98,148
65 and older	755,964	1,784,421	1,031,596	1,031,596	84,497	105,708	71,498	71,436

Footnotes at end of table.

## Individual Noncash Contributions, 2010

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**Table 4. Individual Noncash Charitable Contributions: All Returns with Donations Reported on Form 8283, by Donations Types and Donor Age, Tax Year 2010—Continued**

[All figures are estimates based on samples—money amounts are in thousands of dollars]

Donor age	Household items				Cars and other vehicles			
	Number of returns	Number of donations	Fair market value	Amount carried to Schedule A [1]	Number of returns	Number of donations	Fair market value	Amount carried to Schedule A [1]
	(33)	(34)	(35)	(36)	(37)	(38)	(39)	(40)
<b>All ages</b>	<b>2,527,796</b>	<b>4,531,854</b>	<b>3,263,718</b>	<b>3,258,405</b>	<b>190,622</b>	<b>193,532</b>	<b>399,573</b>	<b>389,312</b>
Under 35	210,756	285,067	329,949	329,229	12,610	12,610	20,983	20,971
35 under 45	531,186	955,509	669,520	669,520	34,482	35,831	42,828	42,828
45 under 55	704,776	1,226,838	907,102	907,097	55,738	55,824	90,223	88,780
55 under 65	650,178	1,223,554	858,828	856,372	56,042	57,374	120,469	120,095
65 and older	430,900	840,884	498,320	496,186	31,750	31,893	125,071	116,638
Donor age	Other [2]							
	Number of returns	Number of donations	Fair market value	Amount carried to Schedule A [1]				
	(41)	(42)	(43)	(44)				
<b>All ages</b>	<b>836,618</b>	<b>1,413,522</b>	<b>2,312,837</b>	<b>2,262,591</b>				
Under 35	58,872	83,272	99,594	99,594				
35 under 45	143,398	266,350	259,759	251,063				
45 under 55	222,847	348,283	561,185	551,216				
55 under 65	234,074	402,582	557,519	532,058				
65 and older	177,427	313,037	834,781	828,659				

[1] Amount carried to Schedule A is the fair market value from Section A (items with a deduction of \$5,000 or less or publicly traded securities) plus the lesser of the fair market value or amount claimed on Section B (items with a deduction of more than \$5,000).

[2] Other donations includes intellectual property, services, airline tickets and miles, and other donations.

# Individual Noncash Contributions, 2010

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**Table 5. Individual Noncash Charitable Contributions: All Donations Made to Donee Organizations Reported on Form 8283, by Donor Age, Tax Year 2010**

[All figures are estimates based on samples—money amounts are in thousands of dollars]

Donor age	All returns							
	Number of returns	Number of donations	Fair market value	Amount carried to Schedule A [1]	Number of returns with contributions on Schedule A	Amount of contributions on Schedule A	Number of returns with cash contributions on Schedule A	Amount of cash contributions on Schedule A
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	
<b>All ages</b>	<b>7,286,205</b>	<b>20,508,458</b>	<b>39,361,731</b>	<b>34,898,507</b>	<b>7,261,402</b>	<b>34,750,637</b>	<b>6,269,039</b>	<b>30,045,459</b>
Under 35	716,554	1,507,358	1,535,742	1,480,987	714,489	1,476,843	524,326	1,001,976
35 under 45	1,681,447	4,600,794	5,177,299	4,124,944	1,676,177	4,104,546	1,355,559	4,142,396
45 under 55	2,030,769	5,775,416	7,561,660	7,041,707	2,025,160	7,015,879	1,785,314	7,725,612
55 under 65	1,787,838	5,275,278	7,926,793	7,393,364	1,781,934	7,351,192	1,603,903	7,984,108
65 and older	1,069,597	3,349,613	17,160,237	14,857,504	1,063,643	14,802,178	999,938	9,191,367
Donor age	Arts, culture, and humanities				Educational institutions			
	Number of returns	Number of donations	Fair market value	Amount carried to Schedule A [1]	Number of returns	Number of donations	Fair market value	Amount carried to Schedule A [1]
(9)	(10)	(11)	(12)	(13)	(14)	(15)	(16)	
<b>All ages</b>	<b>284,849</b>	<b>395,187</b>	<b>1,764,729</b>	<b>1,499,729</b>	<b>360,817</b>	<b>550,563</b>	<b>3,074,607</b>	<b>2,947,477</b>
Under 35	8,969	9,988	5,520	5,520	15,405	26,516	15,377	15,377
35 under 45	23,779	27,979	45,919	40,929	69,344	103,238	114,576	112,589
45 under 55	65,527	89,000	169,708	118,988	93,142	149,380	503,702	497,446
55 under 65	83,059	116,564	189,584	182,907	96,904	146,541	743,663	693,942
65 and older	103,515	151,656	1,353,997	1,151,385	86,022	124,887	1,697,290	1,628,123
Donor age	Environmental and animal-related organizations				Health and medical research			
	Number of returns	Number of donations	Fair market value	Amount carried to Schedule A [1]	Number of returns	Number of donations	Fair market value	Amount carried to Schedule A [1]
(17)	(18)	(19)	(20)	(21)	(22)	(23)	(24)	
<b>All ages</b>	<b>150,535</b>	<b>219,279</b>	<b>2,066,709</b>	<b>1,101,081</b>	<b>934,120</b>	<b>1,592,430</b>	<b>2,774,254</b>	<b>2,747,090</b>
Under 35	12,159	15,813	21,373	13,594	59,172	92,828	76,512	76,512
35 under 45	24,457	33,831	496,999	44,037	188,200	301,466	209,218	209,218
45 under 55	31,765	39,166	484,775	454,176	260,689	462,582	322,860	321,092
55 under 65	51,537	72,418	390,256	210,961	252,556	434,346	360,192	356,182
65 and older	30,617	58,052	673,305	378,313	173,503	301,209	1,805,472	1,784,085

Footnotes at end of table.

## Individual Noncash Contributions, 2010

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**Table 5. Individual Noncash Charitable Contributions: All Donations Made to Donee Organizations Reported on Form 8283, by Donor Age, Tax Year 2010—Continued**

[All figures are estimates based on samples—money amounts are in thousands of dollars]

Donor age	Large organizations				Public and societal benefit			
	Number of returns	Number of donations	Fair market value	Amount carried to Schedule A [1]	Number of returns	Number of donations	Fair market value	Amount carried to Schedule A [1]
	(25)	(26)	(27)	(28)	(29)	(30)	(31)	(32)
<b>All ages</b>	<b>5,620,773</b>	<b>12,549,930</b>	<b>8,901,964</b>	<b>8,899,950</b>	<b>1,485,117</b>	<b>2,533,445</b>	<b>3,013,785</b>	<b>2,537,059</b>
Under 35	580,386	1,072,802	959,344	959,344	105,881	138,012	135,515	135,516
35 under 45	1,350,203	3,094,585	2,131,279	2,131,288	303,470	517,595	438,289	423,979
45 under 55	1,595,258	3,658,222	2,600,459	2,600,360	396,827	663,069	536,418	495,806
55 under 65	1,378,960	3,117,374	2,094,340	2,093,538	392,283	732,506	681,939	650,279
65 and older	715,967	1,606,946	1,116,542	1,115,420	286,655	482,264	1,221,624	831,479
Donor age	Religious organizations				Donor-advised funds			
	Number of returns	Number of donations	Fair market value	Amount carried to Schedule A [1]	Number of returns	Number of donations	Fair market value	Amount carried to Schedule A [1]
	(33)	(34)	(35)	(36)	(37)	(38)	(39)	(40)
<b>All ages</b>	<b>1,162,012</b>	<b>1,993,381</b>	<b>3,495,474</b>	<b>2,837,800</b>	<b>20,287</b>	<b>34,620</b>	<b>1,768,215</b>	<b>1,764,556</b>
Under 35	78,001	114,010	104,552	103,173	79	194	5,562	5,562
35 under 45	204,839	419,318	868,134	343,893	3,019	3,715	113,133	113,923
45 under 55	315,282	548,084	678,043	605,121	4,209	8,046	525,983	521,398
55 under 65	292,129	468,067	648,970	641,160	5,297	8,764	492,339	492,871
65 and older	271,761	443,902	1,195,775	1,144,453	7,682	13,901	631,198	630,801
Donor age	Foundations				Other donees			
	Number of returns	Number of donations	Fair market value	Amount carried to Schedule A [1]	Number of returns	Number of donations	Fair market value	Amount carried to Schedule A [1]
	(41)	(42)	(43)	(44)	(45)	(46)	(47)	(48)
<b>All ages</b>	<b>89,375</b>	<b>165,800</b>	<b>8,927,955</b>	<b>8,718,688</b>	<b>368,592</b>	<b>368,975</b>	<b>3,574,039</b>	<b>1,845,076</b>
Under 35	4,736	4,994	41,561	41,549	28,483	28,490	170,425	124,839
35 under 45	11,447	14,324	505,689	501,016	61,794	61,812	254,061	204,072
45 under 55	18,116	28,582	978,136	972,537	100,964	101,164	761,576	454,783
55 under 65	21,983	56,114	1,765,560	1,639,928	98,397	98,449	559,950	431,595
65 and older	33,093	61,786	5,637,009	5,563,657	78,953	79,061	1,828,026	629,787

[1] Amount carried to Schedule A is the fair market value from Section A of Form 8283 (items with a deduction of \$5,000 or less and certain publicly traded securities) plus the lesser of the fair market value or amount claimed on Section B (items with a deduction of more than \$5,000 except for certain publicly traded securities).



# Split-Interest Trusts, Filing Year 2011

by Lisa Schreiber Rosenmerkel

**F**orm 5227, *Split-Interest Trust Information Return*, is filed for trusts with both charitable and noncharitable beneficiaries. A Form 5227 must be submitted for each calendar year a split-interest trust is in existence.<sup>1</sup> Because Form 5227 is an information return, it is used to disclose the financial activities of the trust, but not to calculate tax liability.

A split-interest trust can be created by a will or in a separate trust instrument. In either case, the instrument specifies the term of the trust, designates the trustee(s) and beneficiaries, and provides parameters for managing assets and distributing income. The instrument usually specifies the contents of the trust at the time it is created. The individual who owns, and then transfers, the assets that make up the trust corpus is known as the grantor. The individuals and entities that receive income from the trust are known as beneficiaries.

A trustee is charged with holding, investing, and distributing the income and assets of the trust. A trustee may be an individual, a group of individuals, or an entity, such as a bank or charity. Each trustee must ensure that all transactions, including distributions, conform to the requirements of the trust instrument and to any applicable laws. Additionally, trustees must coordinate the preparation, verification, and submission of all required State and Federal tax forms.

In Filing Year 2011, some 117,710 Forms 5227 were filed with the IRS (Figure A).<sup>2,3</sup> There are three distinct types of split-interest trusts: charitable remainder trusts, charitable lead trusts, and pooled income funds. Charitable remainder trusts continued to be the most common split-interest trusts, accounting for 93.2 percent of returns filed in 2011. Under a charitable remainder trust (CRT) agreement, an income stream is distributed annually to one or more noncharitable beneficiaries of the trust for a defined period.<sup>4,5</sup> At the end of the period, the trust is dissolved, and the remaining assets are distributed to predetermined charitable beneficiaries.<sup>6</sup> There

are two types of charitable remainder trusts. Charitable remainder annuity trusts (CRATs) and charitable remainder unitrusts (CRUTs) are differentiated by the calculation of the noncharitable distribution amount. Charitable remainder annuity trusts, which account for 14.5 percent of the CRT population, annually distribute a fixed percentage, between 5 percent and 50 percent, of the *initial* fair market value of the property in the trust. Charitable remainder unitrusts distribute a fixed percentage of the fair market value of the trust property, *valued annually*. This percentage is called the “unitrust percentage” and must be between 5 percent and 50 percent.

Trustees of charitable lead trusts filed 6,617 returns in Filing Year 2011. Under a charitable lead trust (CLT) agreement, annual distributions are made to a predetermined charitable beneficiary. The amount that a CLT distributes to charity is not constrained by minimum or maximum payout restrictions. At the end of the trust’s predetermined life, the remaining income and assets are distributed to the designated noncharitable beneficiary.

Pooled income funds are the least common type of split-interest trust, with 1,402 returns filed in 2011 (Figure A). Under a pooled income fund (PIF) arrangement, private donors to a charitable organization contribute to a pool of donated assets and, in return, receive income payments for the remainder of the grantors’ lifetimes.<sup>7</sup> The transfer of assets to the fund must be irrevocable, meaning the assets cannot be removed or replaced with other assets without consent of the beneficiary, in this case the donee charity. The donee charity, commonly a large educational institution, is responsible for the management of the fund, including investing assets and making distributions to beneficiaries. Each year, grantors receive a distribution from the fund based on the ratio of their contributions to the value of the investment pool and the return on the fund assets for that year. At the time of the donor’s death, the charity receives the grantor’s prorated share of the value of the PIF.

## Filer Characteristics

As in previous years, the majority of returns filed in 2011 were for ongoing trusts, in neither the first nor last year

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<sup>1</sup> Split-interest trusts created before May 27, 1969, are exempt from filing a Form 5227 as long as no amounts have been transferred to the trust since May 27, 1969.

<sup>2</sup> A filing year includes all returns submitted to the IRS and processed between January 1 and December 31.

<sup>3</sup> Figure A includes data for six charitable remainder unitrusts otherwise excluded from this article. Data for these outliers are also included in the aggregate tables presented at the conclusion of this article, as well as the online versions. All other figures and calculations in this article exclude data for these six trusts, which accounted for significant proportions of various asset and income categories and distorted the time-series and composition analysis.

<sup>4</sup> The period may be either a fixed duration, statutorily limited to 20 years, or the lifetime of a noncharitable beneficiary. For more information on the allowable duration of charitable remainder trusts, see Internal Revenue Code sections 664(d)(1)(A) and 664(d)(2)(A).

<sup>5</sup> In order to qualify as a noncharitable beneficiary, the individual or individuals must be one or more of the following: the donor, the donor’s spouse, a linear ancestor of a noncharitable beneficiary, or the spouse of a linear ancestor of a noncharitable beneficiary. For more information, see Treasury Regulations 1.1170A-6(c)(2)(i).

<sup>6</sup> The qualifications for a “charitable beneficiary” are detailed in Internal Revenue Code section 170(c).

<sup>7</sup> Pooled income funds are further discussed under Internal Revenue Code section 642(c)(5).

# Split-Interest Trusts, Filing Year 2011

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## Figure A

### Split-Interest Trusts, by Type of Trust, Filing Years 2010 and 2011

[All figures are estimates based on samples—money amounts are in thousands of dollars]

Item	All			Charitable remainder trusts		
	2010	2011	Percent change	2010	2011	Percent change
	(1)	(2)	(3)	(4)	(5)	(6)
<b>Number of returns</b>	<b>118,787</b>	<b>117,710</b>	<b>-0.9</b>	<b>110,768</b>	<b>109,691</b>	<b>-1.0</b>
<b>Net book value of assets, end-of-year [1]</b>	<b>119,692,928</b>	<b>116,294,232</b>	<b>-2.8</b>	<b>99,076,810</b>	<b>94,037,740</b>	<b>-5.1</b>
Book value of assets, end-of-year	121,242,163	118,076,041	-2.6	100,188,561	95,325,653	-4.9
Book value of liabilities, end-of-year	1,549,235	1,781,809	15.0	1,111,751	1,287,913	15.8
Item	Charitable lead trusts			Pooled income funds		
	2010	2011	Percent change	2010	2011	Percent change
	(7)	(8)	(9)	(10)	(11)	(12)
<b>Number of returns</b>	<b>6,609</b>	<b>6,617</b>	<b>0.1</b>	<b>1,410</b>	<b>1,402</b>	<b>-0.6</b>
<b>Net book value of assets, end-of-year [1]</b>	<b>19,338,914</b>	<b>20,945,036</b>	<b>8.3</b>	<b>1,277,204</b>	<b>1,311,456</b>	<b>2.7</b>
Book value of assets, end-of-year	19,626,345	21,297,988	8.5	1,427,257	1,452,400	1.8
Book value of liabilities, end-of-year	287,431	352,953	22.8	150,053	140,943	-6.1

[1] Calculated as the end-of-year book value of total assets (Form 5227, Part IV, line 50, column (b)) minus the end-of-year book value of liabilities (line 56, column (b)).

NOTE: Both filing years in Figure A include data for six charitable remainder unitrusts that otherwise distorted the analysis presented in this article. Data for these trusts also are included in the aggregate tables presented at the conclusion of this article, as well as the online versions. All other figures and calculations in this article exclude data for these six trusts. Detail may not add to totals due to rounding.

of existence. Ongoing trusts accounted for 93.8 percent of all Forms 5227 filed. Just 1.8 percent of the population comprised initial returns, which were filed for newly created trusts. Final returns were more common; in 2011, preparers for terminating trusts filed 5,272 returns, or 4.5 percent of the total population. Of the three types of split-interest trusts (SITs), trustees of charitable lead trusts continued to be the most likely to file either an initial or a final return, with returns for ongoing trusts making up 87.1 percent of the CLTs filed.

The average lifetime of a split-interest trust that terminated in 2011 was approximately 13 years, a decline from the previous average of 15 years. As in previous years, terminating pooled income funds continued to have the longest average lifetime of all the SIT types, approximately 18 years. This extended lifetime could be explained by the institutional structure of PIFs, in which a single charity oversees the assets of multiple donors. Charitable lead trusts terminating in 2011 had an average lifetime of nearly 12 years. Charitable remainder unitrusts and charitable remainder annuity trusts terminating in Filing Year 2011 had similar average lifetimes, 13 and 14 years respectively, perhaps because both are likely to terminate with the death of the noncharitable beneficiary.

As in previous years, paid preparers completed the vast majority, 77.7 percent of returns, filed in 2011

(Figure B). Of those returns that did not indicate a paid preparer, 87.0 percent reported institutions, such as banks or charities, as the trustee. When entities such as these act as trustee, it is likely that the return was professionally prepared, even if a paid preparer did not sign the return. For example, while paid preparers completed only 52.5 percent of the returns filed for pooled income funds, 95.2 percent of the PIF returns without a paid preparer indicated the presence of institutional trustees. Returns for CLTs were most likely to be completed by a paid preparer; in 2011, only 15.7 percent of returns filed for CLTs did not utilize a paid preparer.

### Income and Deductions

Gross income, defined as the sum of all income from any source prior to deductions, increased sharply in 2011. In total, split-interest trust filers reported \$9.7 billion for 2011, up from \$8.0 billion in 2010 (Figure C).<sup>8</sup> Charitable remainder unitrusts, which represented the majority of returns filed, also accounted for the highest amount of gross income, nearly \$7.0 billion. Overall, split-interest trusts averaged approximately \$86,000 gross income per return. However, the median value was slightly less than \$10,000, indicating a wide range of reported values. Charitable lead trust filers continued to report the highest average gross income per return. Some 6,274 CLT

## Split-Interest Trusts, Filing Year 2011

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### Figure B

#### Utilization of Paid Preparers and Distribution of Trustee Type, by Type of Trust, Filing Year 2011

[All figures are estimates based on samples]

Preparer status, type of trustee	All	Charitable remainder annuity trusts	Charitable remainder unitrusts	Charitable lead trusts	Pooled income funds
	(1)	(2)	(3)	(4)	(5)
All returns	117,704	15,862	93,822	6,617	1,402
Paid preparer [1]	91,404	10,483	74,607	5,579	736
Unpaid preparer	26,300	5,379	19,216	1,038	667
Institutional trustee	22,890	4,928	16,485	842	635
Noninstitutional trustee	3,410	452	2,730	196	* 32

\* Estimate should be used with caution because of the small number of sample returns on which it is based.

[1] The presence of a paid preparer is indicated on page 6 of Form 5227.

NOTE: Detail may not add to totals due to rounding.

### Figure C

#### Gross Income, by Type of Trust, Filing Year 2011

[All figures are estimates based on samples—money amounts are in thousands of dollars]

Item	All	Charitable remainder annuity trusts	Charitable remainder unitrusts	Charitable lead trusts	Pooled income funds
	(1)	(2)	(3)	(4)	(5)
Number of returns	117,704	15,862	93,822	6,617	1,402
Number of returns with gross income	112,390	15,540	89,238	6,274	1,337
Amount of gross income reported [1]	9,715,303	709,622	6,973,250	1,928,930	103,500

[1] Gross income is defined as the sum of all income from any source prior to deductions.

NOTE: Detail may not add to totals due to rounding.

filers reported gross income of \$1.9 billion, or approximately \$307,000 per return. Charitable remainder annuity trust filers reported the lowest average gross income per return, approximately \$46,000. The median value of gross income reported for CLTs and CRATs was approximately \$47,000 and \$5,000, respectively.

Charitable remainder trusts that incurred any unrelated business taxable income were also required to file Form 4720, *Return of Certain Excise Taxes Under Chapters 41 and 42 of the Internal Revenue Code*.<sup>9</sup> In Filing Year 2011, filers of 169 charitable remainder trust returns noted unrelated business income (UBI) on Form 5227.<sup>10</sup> More than 97 percent of those reporting UBI were CRUTs.

Income received by trusts is divided into three income categories for reporting purposes: ordinary income, capital gains, and nontaxable income. The value of all three income categories reported for split-interest trusts rose between Filing Years 2010 and 2011. As in prior years, ordinary income, which includes income that

is not the result of the sale or exchange of a capital asset interest, such as ordinary dividends, made up the majority of trust income for all trust types (Figure D). Total ordinary income rose by 7 percent, from \$4.4 billion to \$4.7 billion in 2011. Dividends and business income continued to be the largest component of ordinary income, increasing by nearly 5 percent between the 2 years. Total capital gains increased significantly, from -\$2.9 billion to \$1.7 billion in 2011. Long-term capital gains made up 99.0 percent of the amount reported. Total nontaxable income was the most stable of the income categories, increasing by only 2.3 percent. Total deductions continued to decline in 2011. Interest and taxes remained the smallest deductions reported for split-interest trusts.

#### Balance Sheet

Overall, total end-of-year assets, which include cash, receivables, and investments, reported for split-interest trusts increased only slightly, by 0.6 percent, between 2010 and 2011 (Figure E). Total investments increased

<sup>9</sup> Any income that a charitable remainder trust receives from a trade or business that is not substantially related to its exempt purpose is subject to tax. One example of unrelated business income is debt financed income, which includes dividends from stock purchased through a margin account. For more information, see IRS Publication 598, *Tax on Unrelated Business Income of Exempt Organizations*.

<sup>10</sup> For more information on the amounts reported on Form 4720, *Return of Certain Excise Taxes Under Chapters 41 and 42 of the Internal Revenue Code*, visit the Tax Stats Web site: <http://www.irs.gov/Charities-&-Non-Profits/Private-Foundations/Form-4720>.

## Split-Interest Trusts, Filing Year 2011

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### Figure D

#### Income and Deductions, Filing Years 2010 and 2011

[All figures are estimates based on samples—money amounts are in thousands of dollars]

Item	2010	2011	Percent change
	(1)	(2)	(3)
<b>Number of returns</b>	<b>118,781</b>	<b>117,704</b>	<b>-0.9</b>
<b>Total income [1]</b>	<b>1,726,241</b>	<b>6,601,833</b>	<b>282.4</b>
Total ordinary income	4,401,555	4,708,552	7.0
Total capital gains (losses)	-2,858,738	1,705,599	159.7
Total nontaxable income	183,424	187,682	2.3
<b>Total deductions [2]</b>	<b>932,199</b>	<b>862,849</b>	<b>-7.4</b>

[1] Total income is the sum of ordinary income, capital gains, and nontaxable income, prior to any deductions.

[2] Total deductions includes deductions allocable to income and corpus.

NOTE: Detail may not add to totals due to rounding.

by 0.7 percent, to \$97.6 billion in 2011. Corporate stock remained the largest investment category but posted a decline, falling 1.4 percent from 2010 to 2011. The largest increase was reported for land, buildings, and equipment, which grew 15.8 percent to \$1.4 billion.

The change in total end-of-year assets varied among the different types of split-interest trusts. Trustees of charitable lead trusts reported the largest increase in total investments. In fact, charitable lead trusts accounted for most of the increase in the value of land, buildings, and equipment across all trust types. In contrast, both types of charitable remainder trusts reported some decline in total investments. Pooled income funds reported little change, with total investments increasing by only 0.8 percent. For all split-interest trusts, liabilities increased from \$1.5 billion in 2010 to \$1.8 billion in 2011.

#### Charitable Distributions

Trustees for all split-interest trusts must report any trust distributions of principal or income for charitable purposes on Form 5227. The details of these charitable distributions, as well as the trust income and asset holdings, are available to the public.<sup>11</sup> As in prior years, split-interest trusts made distributions of principal more frequently and in larger dollar amounts than distributions of income. In total, 6,354 split-interest trusts, 5.4 percent of the population, reported distributions of principal to charities. Some 15,233 distributions of principal totaling \$2.3 billion were made to charities in Filing Year 2011 (Figure F).<sup>12</sup> The dollar amount of distributions increased slightly, by 3.6 percent, from 2010. Charitable remainder unitrusts

made both the highest number and largest amount of distributions of principal. This is primarily the result of the final distributions made by charitable remainder trusts at the end of their lifetimes. Final distributions, which include all assets remaining in the trust, totaled \$1.4 billion, or 78.2 percent of all distributions of principal made by CRTs in Filing Year 2011. As in previous years, distributions of income to charity were less frequent and of smaller amounts than those derived from principal. Only 3,054 split-interest trusts reported distributing income to charitable organizations. Trustees made 12,759 distributions of income in 2011 (Figure G). The amount of distributions increased only slightly, by less than 1 percent, to \$793.0 million. As would be expected given their structures, charitable lead trusts dominated both the number and amount of charitable distributions of income. As in previous years, pooled income funds were the least likely to make distributions of income.

Charitable beneficiaries are categorized into the ten major groups based on their institutional purpose and major programs and activities as defined by the National Taxonomy of Exempt Entities (NTEE).<sup>13</sup> Education-oriented charities received the greatest number of distributions of income and principal from SITs overall. In total, trustees reported 6,275 distinct donations of income and principal to charities whose charitable purpose was related to education, 22.4 percent of the total. Yale University received the highest number of distributions from split-interest trusts of any education-related charity. In total, trusts made 109 distributions to Yale University in Filing Year 2011, for a total of \$8.3 million. Trustees

<sup>11</sup> This change effective for Filing Year 2007 forward. The only portion of the Form 5227 not available for public inspection is Schedule A, which includes details of distributions to and donations from individuals and noncharitable entities.

<sup>12</sup> The number of distributions made refers to the number made to unique charities on a given return. If a trust made multiple distributions to a single charity during the course of a tax year, it was counted as a single distribution.

<sup>13</sup> The National Taxonomy of Exempt Entities (NTEE) was developed by the National Center for Charitable Statistics. For information, see the National Center for Charitable Statistics Web site: [www.nccs.urban.org](http://www.nccs.urban.org).

## Split-Interest Trusts, Filing Year 2011

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**Figure E**

### Investment Allocations, by Type of Trust, Filing Years 2010 and 2011

[All figures are estimates based on samples—money amounts are in thousands of dollars]

Item	All			Charitable remainder annuity trusts			Charitable remainder unitrusts		
	2010	2011	Percent change	2010	2011	Percent change	2010	2011	Percent change
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)
<b>Net book value of assets, end-of-year</b>	<b>108,792,757</b>	<b>109,460,126</b>	<b>0.6</b>	<b>7,494,666</b>	<b>7,136,591</b>	<b>-4.8</b>	<b>80,681,973</b>	<b>80,067,043</b>	<b>-0.8</b>
<b>Total book value of assets, end-of-year</b>	<b>110,341,993</b>	<b>111,241,936</b>	<b>0.8</b>	<b>7,592,004</b>	<b>7,216,682</b>	<b>-4.9</b>	<b>81,696,387</b>	<b>81,274,866</b>	<b>-0.5</b>
<b>Total investments</b>	<b>96,913,337</b>	<b>97,575,097</b>	<b>0.7</b>	<b>6,384,845</b>	<b>6,013,071</b>	<b>-5.8</b>	<b>72,576,632</b>	<b>72,027,970</b>	<b>-0.8</b>
U.S. and State government obligations	6,000,320	5,791,402	-3.5	841,659	905,774	7.6	4,473,387	4,000,674	-10.6
Corporate stock	44,022,765	43,398,248	-1.4	3,360,876	3,002,368	-10.7	34,317,430	33,059,877	-3.7
Corporate bonds	9,927,487	9,848,241	-0.8	935,472	908,068	-2.9	7,303,611	7,235,666	-0.9
Land, buildings, and equipment	1,193,502	1,382,166	15.8	83,400	76,047	-8.8	901,888	925,885	2.7
Other investments	35,769,263	37,155,040	3.9	1,163,438	1,120,814	-3.7	25,580,315	26,805,868	4.8
<b>Total book value of liabilities, end-of-year</b>	<b>1,549,235</b>	<b>1,781,809</b>	<b>15.0</b>	<b>97,338</b>	<b>80,091</b>	<b>-17.7</b>	<b>1,014,413</b>	<b>1,207,822</b>	<b>19.1</b>
Charitable lead trusts									
Item				Pooled income funds					
	2010	2011	Percent change	2010	2011	Percent change	2010	2011	Percent change
	(10)	(11)	(12)	(13)	(14)	(15)			
<b>Net book value of assets, end-of-year</b>	<b>19,338,914</b>	<b>20,945,036</b>	<b>8.3</b>	<b>1,277,204</b>	<b>1,311,456</b>	<b>2.7</b>			
<b>Total book value of assets, end-of-year</b>	<b>19,626,345</b>	<b>21,297,988</b>	<b>8.5</b>	<b>1,427,257</b>	<b>1,452,400</b>	<b>1.8</b>			
<b>Total investments</b>	<b>16,639,780</b>	<b>18,210,866</b>	<b>9.4</b>	<b>1,312,080</b>	<b>1,323,190</b>	<b>0.8</b>			
U.S. and State government obligations	583,859	786,754	34.8	101,415	98,201	-3.2			
Corporate stock	5,781,590	6,778,439	17.2	562,868	557,564	-0.9			
Corporate bonds	1,227,400	1,220,822	-0.5	461,004	483,685	4.9			
Land, buildings, and equipment	180,376	351,862	95.1	* 27,838	* 28,372	1.9			
Other investments	8,866,555	9,072,990	2.3	158,955	155,369	-2.3			
<b>Total book value of liabilities, end-of-year</b>	<b>287,431</b>	<b>352,953</b>	<b>22.8</b>	<b>150,053</b>	<b>140,943</b>	<b>-6.1</b>			

\* Estimate should be used with caution because of the small number of sample returns on which it is based.

**Figure F**

### Charitable Distributions of Principal, by Type of Trust and Charity Type, Filing Year 2011

[All figures are estimates based on samples—money amounts are in thousands of dollars]

Charity type	All		Charitable remainder annuity trusts		Charitable remainder unitrusts		Charitable lead trusts		Pooled income funds	
	Number	Amount	Number	Amount	Number	Amount	Number	Amount	Number	Amount
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)
<b>Total</b>	<b>15,233</b>	<b>2,271,978</b>	<b>1,355</b>	<b>365,033</b>	<b>6,834</b>	<b>1,415,917</b>	<b>6,667</b>	<b>450,861</b>	<b>378</b>	<b>40,167</b>
Arts, culture, and humanities	1,282	127,622	133	68,185	458	49,672	685	9,019	* 6	* 746
Education	3,672	577,110	408	150,049	1,909	344,250	1,152	63,234	204	19,577
Environment, animals	782	19,325	* 65	* 3,215	210	12,271	487	1,899	20	1,941
Health	1,811	244,646	188	43,576	723	190,573	857	9,414	* 43	* 1,084
Human services	2,206	81,327	119	10,689	751	60,590	1,299	8,971	37	1,076
International, foreign affairs	466	16,664	* 97	* 5,916	140	9,797	229	951	0	0
Public, societal benefit	2,519	1,008,847	182	69,577	928	588,770	1,376	338,471	33	12,030
Religion related	2,379	170,293	163	13,827	1,662	138,478	520	14,276	35	3,712
Mutual membership benefit organizations	0	0	0	0	0	0	0	0	0	0
Other	115	26,142	0	0	52	21,516	63	4,626	0	0

\* Estimate should be used with caution because of the small number of sample returns on which it is based.

NOTES: "Number" shown in the heading for columns 1, 3, 5, etc. refers to the number of distributions made to unique charities. Multiple distributions made to a single charity by the same trust were counted as a single distribution. Detail may not add to totals because of rounding.

## Split-Interest Trusts, Filing Year 2011

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### Figure G

#### Charitable Distributions of Income, by Type of Trust and Charity Type, Filing Year 2011

[All figures are estimates based on samples—money amounts are in thousands of dollars]

Charity type	All		Charitable remainder annuity trusts		Charitable remainder unitrusts		Charitable lead trusts		Pooled income funds	
	Number	Amount	Number	Amount	Number	Amount	Number	Amount	Number	Amount
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)
<b>Total</b>	<b>12,759</b>	<b>793,023</b>	<b>255</b>	<b>17,505</b>	<b>1,640</b>	<b>106,754</b>	<b>10,681</b>	<b>668,358</b>	<b>183</b>	<b>406</b>
Arts, culture, and humanities	1,293	31,137	* 1	* 1	* 40	* 395	1,252	30,740	0	0
Education	2,603	164,762	99	2,134	218	90,179	2,200	72,247	85	202
Environment, animals	1,007	10,823	0	0	* 84	* 2,524	910	8,290	* 13	* 9
Health	1,292	20,171	* 51	* 68	* 9	* 89	1,211	19,882	* 21	* 132
Human services	1,898	18,133	* 13	* 169	* 49	* 621	1,799	17,321	36	22
International, foreign affairs	361	4,364	* 5	* 14	* 6	* 74	350	4,276	0	0
Public, societal benefit	2,061	483,234	55	14,167	97	11,229	1,892	457,815	* 17	* 22
Religion related	1,993	24,603	* 28	* 944	1,086	1,635	879	22,021	* 1	* 2
Mutual membership benefit organizations	* 12	* 21	0	0	0	0	* 1	* 4	* 11	* 17
Other	239	35,775	* 3	* 7	51	6	185	35,762	0	0

\* Estimate should be used with caution because of the small number of sample returns on which it is based.

NOTES: "Number" shown in the heading for columns 1, 3, 5, etc. refers to the number of distributions made to unique charities. Multiple distributions made to a single charity by the same trust were counted as a single distribution. Detail may not add to totals because of rounding.

for 85 trusts reported distributions to the President and Fellows of Harvard totaling \$23.8 million, making it the second most frequent recipient.

Charities related to public or societal benefit received the largest amount of distributions of income and principal from split-interest trusts in 2011, \$1.5 billion or 48.7 percent of total distributions. The Walton Family Foundation received the highest dollar amount of any charity in the public or societal benefit category. In fact, the Walton Family Foundation received \$237.6 million from SITs in 2011, the highest amount of any charity in any category.

### Noncharitable Distributions

Noncharitable distribution amounts of charitable remainder unitrusts are based on a fixed percentage of the fair market value of the trust property, *valued annually*. This percentage is called the "unitrust percentage" and must be between 5 percent and 50 percent. As in past years, the majority of CRUTs filing in 2011 reported unitrust percentages between 5 and 10 percent (Figure H). Less than 1 percent of filings reported unitrust percentages greater than 20 percent.

In Filing Year 2011, the majority of all CRUT trustees reported calculating noncharitable distributions using the standard structure (Figure I). The standard structure requires trustees to distribute to beneficiaries the unitrust amount, calculated as the unitrust percentage multiplied by the net fair market value of assets. This ensures the

most stable payment for beneficiaries; however, in years of poor investment performance, the trustee may have to liquidate trust assets to make the payment. In addition to the standard charitable remainder unitrust structure, two common variants allow for added flexibility in meeting the noncharitable distribution requirement. The net income charitable remainder unitrust (NI-CRUT) variant permits the trustee to distribute only the amount of trust income earned in that year, when that amount is less than

### Figure H

#### Charitable Remainder Unitrusts: Reported Unitrust Percentage, Filing Year 2011

[All figures are estimates based on samples]

Unitrust percentage	Number of returns	Percent of total
<b>All returns</b>	<b>93,822</b>	<b>100.0</b>
Invalid unitrust percentage [1]	1,585	1.7
5 percent under 10 percent	79,764	85.0
5 percent under 6 percent	19,834	21.1
6 percent under 7 percent	18,484	19.7
7 percent under 8 percent	19,016	20.3
8 percent under 9 percent	17,756	18.9
9 percent under 10 percent	4,674	5.0
10 percent under 20 percent	11,970	12.8
20 percent under 35 percent	407	0.4
35 percent to 50 percent	96	0.1

[1] In these cases, an invalid unitrust percentage of less than 5 percent or more than 50 percent was reported and could not be reconciled.

NOTES: Detail may not add to totals due to rounding.

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### Figure I

#### Charitable Remainder Unitrust (CRUT) Structures, by Size of End-of-Year Book Value of Total Assets, Filing Year 2011

[All figures are estimates based on samples]

Charitable remainder unitrust structure	All		Size of end-of-year book value of total assets					
			Under \$500,000 [1]		\$500,000 under \$3 million		\$3 million or more	
	Number of returns	Percent of total	Number of returns	Percent of total	Number of returns	Percent of total	Number of returns	Percent of total
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
All CRUTs	93,822	100.0	67,211	100.0	23,263	100.0	3,349	100.0
Standard CRUT	74,234	79.1	53,795	80.0	18,160	78.1	2,279	68.1
Net income CRUT	3,940	4.2	2,894	4.3	916	3.9	131	3.9
Net income with makeup CRUT	15,648	16.7	10,522	15.7	4,187	18.0	939	28.0

[1] Includes returns that did not report end-of-year book value of total assets (Form 5227, Part IV, line 50, column (b)) from the balance sheet, or that reported the amount as zero. Often, these zero amounts are explained by trusts filing a final return.

NOTE: Detail may not add to totals due to rounding.

### Figure J

#### Noncharitable Distributions, by Charitable Remainder Trust Type, Filing Year 2011

[All figures are estimates based on samples—money amounts are in thousands of dollars]

Item	All charitable remainder trusts		Charitable remainder annuity trusts		Charitable remainder unitrusts	
	(1)	(2)	(3)	(4)	(5)	(6)
Number of returns	109,685	N/A	15,862	N/A	93,822	N/A
Total noncharitable distributions [1]	5,198,500	100.0	604,291	100.0	4,594,210	100.0
Ordinary income	1,732,571	33.3	153,148	25.3	1,579,423	34.4
Short-term capital gains (losses)	330,418	6.4	24,672	4.1	305,746	6.7
Long-term capital gains (losses)	2,339,461	45.0	220,101	36.4	2,119,360	46.1
Nontaxable income	80,445	1.5	28,892	4.8	51,553	1.1
Corpus	715,605	13.8	177,476	29.4	538,129	11.7

N/A—Not applicable.

[1] May include distributions made after December 31 of the tax year and therefore may not be reflected on the accumulation schedule.

NOTE: Detail may not add to totals due to rounding.

the distribution that would otherwise be required.<sup>14</sup> By allowing the trustee to limit distributions in years when the trust's income is low, depletion of the trust corpus can be avoided. Only 4.2 percent of CRUTs were identified as NI-CRUTs. The net income with makeup charitable remainder unitrust (NIM-CRUT) variant works somewhat like a NI-CRUT, in that the trustee is allowed to distribute the lesser of the trust income or the required percentage of fair market value.<sup>15</sup> However, for NIM-CRUTs, any deficits in required distributions accumulate, and the trustee must make up for these deficiencies when trust income permits. Approximately 16.7 percent of CRUTS were identified as NIM-CRUTS. CRUTs with

\$3 million or more in end-of-year book value assets were more likely to be NIM-CRUTs than those holding lower value portfolios.

The *Current Distributions Schedule* on Schedule A of Form 5227 details current-year noncharitable distributions made by trustees of both CRATs and CRUTs. Overall, the amount of noncharitable distributions declined by 8.0 percent between 2010 and 2011. Long-term capital gains continued to dominate the distributions in 2011 (Figure J). Ordinary income, primarily interest and dividends, was the second most common distribution overall. Short-term capital gains were the least common distribution made for annuity trusts, while unitrusts were

<sup>14</sup> For more information regarding net income charitable remainder unitrusts, see Internal Revenue Code section 664(d)(3)(A).

<sup>15</sup> For more information regarding net income with makeup charitable remainder unitrusts, see Internal Revenue Code section 664(d)(3)(B).

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## Figure K

### Asset Contributions, by Filing Status and Asset Type, Filing Year 2011

[All figures are estimates based on samples—money amounts are in thousands of dollars]

Item	All	Initial trusts	Ongoing and final trusts
	(1)	(2)	(3)
<b>Number of returns</b>	<b>117,704</b>	<b>2,073</b>	<b>115,631</b>
<b>Number of returns with asset contributions</b>	<b>2,161</b>	<b>290</b>	<b>1,872</b>
<b>Number of asset contributions [1]</b>	<b>7,011</b>	<b>2,483</b>	<b>4,529</b>
<b>Total asset contributions</b>	<b>3,004,901</b>	<b>2,364,830</b>	<b>640,071</b>
Cash and money market accounts	1,005,577	805,239	200,338
Stocks [2]	859,339	644,867	214,472
Bonds	85,243	d	d
Real estate [3]	179,057	d	d
Other assets [4]	875,684	711,819	163,865

d—Data are suppressed to prevent disclosure of individual taxpayer data. However, the data are included in the appropriate totals.

[1] Asset contributions are reported on Form 5227, Schedule A, Part III, and include both initial contributions made when the trust is created and additional contributions made during the lifetime of the trust.

[2] The value of stock includes both publicly traded and closely held stocks.

[3] The value given for real estate includes traditional real estate as well as real estate mutual funds and partnerships.

[4] Other assets includes such items as retirement assets, annuities, partnerships, insurance assets, and art.

NOTE: Detail may not add to totals due to rounding.

less likely than annuity trusts to distribute nontaxable income. Distributions from corpus represented a higher percentage of total distributions for CRATs than for CRUTs. This may be the result of the strict distribution requirements that typify CRAT agreements. Since the noncharitable distribution amount is fixed throughout the trust's life, trustees may find it necessary to liquidate assets in the corpus to meet the yearly requirement.

## Asset Donation

The *Assets and Donor Information* section of Schedule A, Form 5227, details both initial and additional asset contributions to the trust, as well as the date and source of the contribution. In Filing Year 2011, some 2,161 split-interest trust returns reported a total of 7,011 asset contributions (Figure K). Cash and money market accounts comprised 33.5 percent of the value of all asset contributions. Of the returns that reported asset contributions, 13.4 percent were filed for initial trusts. These initial returns accounted for 78.7 percent of the total value of all contributions. Ongoing and final trusts comprised 86.6 percent of the returns reporting asset contributions but only 21.3 percent of the total value of all contributions. Stocks comprised the largest percentage of contributions reported by non-initial trusts, 33.5 percent of the total value.

## Summary

In 2011, some 117,710 *Split-Interest Trust Information Returns* (Form 5227) were filed for charitable remainder trusts, charitable lead trusts, and pooled income funds.

In total, split-interest trust filers reported \$9.7 billion in gross income and \$118.1 billion in end-of-year assets. Corporate stock continued to account for the majority of assets held by split-interest trusts, though its value decreased slightly in 2011. Total income reported on Form 5227 increased to \$6.6 billion in 2011. Trustees of split-interest trusts reported approximately \$3.1 billion in charitable distributions and \$5.2 billion in noncharitable distributions. Split-interest trusts received more than \$3.0 billion in asset contributions throughout the year.

## Data Sources and Limitations

The data presented in this article were collected from a sample of Forms 5227, *Split-Interest Trust Information Returns*, selected during Filing Year 2011. A filing year includes returns received by the IRS for processing between January 1 and December 31 of a given year and primarily comprises returns for the tax year immediately prior. However, it may include late-filed returns for numerous other tax years. For Filing Year 2011, approximately 97.6 percent of returns included in the sample were for Tax Year 2010, while Tax Year 2009 returns comprised 1.6 percent of the sampled returns. Partial-year returns, for either initial or final reporting periods, were included in the SOI sample. All returns included in the sample were computer-designated at the IRS Ogden Submission Processing Center after posting to the IRS Master File.

For Filing Year 2011, a sample of 11,487 returns was drawn from an estimated population of 118,278. This sample count includes returns that were selected for the

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**Figure L**

### Population, Sample, and Sampling Rates, by Type of Split-Interest Trust and Size of End-of-Year Book Value of Total Assets, Filing Year 2011

Type of trust, item	All	Reported size of end-of-year book value of total assets [1]		
		Less than \$1 million	\$1 million under \$10	\$10 million or more
	(1)	(2)	(3)	(4)
<b>Charitable remainder annuity trusts:</b>				
Population [2]	15,137	13,764	1,304	69
Sample	1,419	860	490	69
Sampling rate (percentage)	9.4	6.2	37.6	100.0
<b>Charitable remainder unitrusts:</b>				
Population [2]	95,151	82,484	11,937	730
Sample	8,805	4,091	3,984	730
Sampling rate (percentage)	9.3	5.0	33.4	100.0
<b>Charitable lead trusts:</b>				
Population [2]	6,578	4,286	1,982	310
Sample	1,036	224	502	310
Sampling rate (percentage)	15.7	5.2	25.3	100.0
<b>Pooled income funds:</b>				
Population [2]	1,412	1,207	182	23
Sample	227	114	90	23
Sampling rate (percentage)	16.1	9.4	49.5	100.0

[1] This is the value the tax preparer reported on Form 5227, Part IV, line 50, column (b). "Less than \$1 million" includes returns that did not report end-of-year book value of total assets from the balance sheet, or that reported the amount as zero. Often these zero amounts are explained by trusts filing a final return.

[2] These population totals include returns that were rejected during the editing process. Returns could be rejected if they were not one of the four types of trusts included in the study or if no money amounts were reported. As a result, these totals may not match totals presented elsewhere in the article.

sample but later rejected. Returns were rejected if they were not one of the four types of trusts included in the study, or if no money amounts were reported. The sample was stratified by the type of the trust (charitable remainder annuity trust, charitable remainder unitrust, charitable lead trust, or pooled income fund) and the reported end-of-year book value of total assets. Figure L details the sampling strata and rates. The data entry process revealed some trusts with incorrect type classifications. In these cases, the trust information was corrected to reflect the correct type. However, the weights used for these trusts were based on the original sample selection classification. The magnitude of sampling error for selected items, measured by coefficients of variation, is shown in Figure M.

All samples were designed to provide reliable estimates of financial activity. All data were collected from original returns as they were filed, and returns were subjected to comprehensive testing and data verification procedures to ensure the highest quality of data. Changes that were made to the return after filing, either by the taxpayer (on an amended return) or during IRS processing, generally were not incorporated. A complete discussion of the reliability of estimates based on samples, methods for evaluating the magnitude of both sampling and nonsampling error, and the precision of the sample estimates can be found in SOI Sampling Methodology and Data Limitations later in this issue of the *SOI Bulletin* or at [www.irs.gov/pub/irs-soi/sampling.pdf](http://www.irs.gov/pub/irs-soi/sampling.pdf).

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## Figure M

### Coefficients of Variation for Selected Items, by Type of Split-Interest Trust and Size of End-of-Year Book Value of Total Assets, Filing Year 2011

Type of trust, Item	All	Size of end-of-year book value of total assets		
		Under \$500,000 [1]	\$500,000 under \$3 million	\$3 million or more
		Coefficient of variation (percentage)		
	(1)	(2)	(3)	(4)
<b>Charitable remainder annuity trusts:</b>				
Number of returns	1.09	1.73	5.62	5.63
Total ordinary income	2.98	6.66	6.08	4.44
Total capital gains	9.91	23.44	13.03	13.46
Total capital losses	9.88	17.75	17.39	18.58
Total nontaxable income	8.16	19.93	12.57	13.10
End-of-year total assets (book value)	1.90	3.95	4.26	3.47
End-of-year total liabilities (book value)	14.75	24.37	31.66	11.23
<b>Charitable remainder unitrusts:</b>				
Number of returns	0.18	0.73	2.04	1.91
Total ordinary income	1.10	2.79	4.04	0.96
Total capital gains	2.80	7.41	6.07	3.47
Total capital losses	1.05	10.19	5.62	0.99
Total nontaxable income	4.79	24.02	5.78	4.48
End-of-year total assets (book value)	0.47	1.49	1.47	0.69
End-of-year total assets (fair market value) [2]	0.53	1.87	1.60	0.70
End-of-year total liabilities (book value)	4.71	10.41	10.14	5.70
<b>Charitable lead trusts:</b>				
Number of returns	0.51	4.71	5.01	3.62
Total ordinary income	2.38	20.02	7.00	2.57
Total capital gains	5.08	24.53	14.95	5.73
Total capital losses	6.15	23.48	15.36	5.44
Total nontaxable income	10.44	57.20	17.92	11.33
End-of-year total assets (book value)	0.86	9.37	3.73	1.21
End-of-year total liabilities (book value)	10.85	37.88	23.46	12.73
<b>Pooled income funds:</b>				
Number of returns	0.72	3.21	13.70	12.57
Total ordinary income	3.50	11.52	10.61	4.68
Total capital gains	12.46	32.31	17.89	18.91
Total capital losses	6.87	41.35	25.16	4.27
Total nontaxable income	62.20	94.44	70.79	N/A
End-of-year total assets (book value)	3.24	9.75	9.35	4.68
End-of-year total liabilities (book value)	1.08	39.19	41.28	0.05

N/A—denotes a coefficient of variation that could not be calculated due to a lack of information.

[1] Includes returns that did not report end-of-year book value of total assets (Form 5227, Part IV, line 50, column (b)) from the balance sheet, or that reported the amount as zero.

Often, these zero amounts are explained by trusts filing a final return.

[2] For charitable remainder unitrusts, taken from an estimated end-of-year fair market value.

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**Table 1. Charitable Remainder Annuity Trusts: Income and Deductions, by Size of End-of-Year Book Value of Total Assets, Filing Year 2011**

[All figures are estimates based on samples—money amounts are in thousands of dollars]

Item	Total	Size of end-of-year book value of total assets				
		Under \$500,000 [1]	\$500,000 under \$1,000,000	\$1,000,000 under \$3,000,000	\$3,000,000 under \$10,000,000	\$10,000,000 or more
(1)	(2)	(3)	(4)	(5)	(6)	
<b>Number of returns</b>	<b>15,862</b>	<b>12,854</b>	<b>1,652</b>	<b>1,019</b>	<b>275</b>	<b>62</b>
<b>Total net income (loss)</b>	<b>336,554</b>	<b>87,177</b>	<b>38,517</b>	<b>75,818</b>	<b>60,679</b>	<b>74,362</b>
Net ordinary income	168,525	38,332	24,750	36,634	27,903	40,905
Total ordinary income	217,574	54,787	31,807	47,736	36,522	46,722
Interest income	65,338	13,189	10,841	16,284	11,601	13,423
Ordinary dividends and business income (loss)	121,836	32,062	19,165	25,587	20,143	24,879
Rents, royalties, partnerships, other estates and trusts, etc.	10,107	2,171	* 196	2,644	4,202	894
Farm income (loss)	* 65	0	0	* 65	0	0
Ordinary gain (loss)	8,253	* 600	* 386	* .99	* 13	* 7,353
Other income	11,976	6,765	1,220	3,257	562	172
Deductions allocable to ordinary income	49,049	16,454	7,058	11,102	8,619	5,817
Net capital gains (losses)	138,655	43,427	8,078	33,198	24,068	29,884
Total capital gains (losses)	143,563	45,592	9,194	34,196	24,523	30,057
Total short-term capital gains (losses)	28,187	5,389	3,774	6,257	4,365	8,403
Total long-term capital gains (losses)	115,376	40,204	5,420	27,939	20,158	21,655
Deductions allocable to capital gains	4,908	2,165	1,117	998	455	* 173
Net nontaxable income	29,374	5,418	5,690	5,986	8,708	3,573
Total nontaxable income	34,117	6,960	6,350	6,992	9,954	3,860
Tax-exempt interest	33,045	6,214	6,255	6,777	9,938	3,860
Other nontaxable income	1,072	747	* 96	* 214	* 15	0
Deductions allocable to nontaxable income	4,742	1,543	661	1,005	1,246	288
<b>Total deductions [2]</b>	<b>58,841</b>	<b>20,297</b>	<b>8,841</b>	<b>13,106</b>	<b>10,320</b>	<b>6,277</b>
Interest	834	* 9	* 3	357	442	* 22
Taxes	392	73	* 25	93	109	92
Trustee fee	35,163	11,395	5,821	8,190	6,022	3,736
Attorney, accountant, and return preparer fees	7,477	4,659	986	1,104	561	168
Other allowable deductions	14,976	4,161	2,006	3,362	3,187	2,260

\* Estimate should be used with caution because of the small number of sample returns on which it is based.

[1] Includes returns that did not report the end-of-year book value of total assets (Form 5227, Part IV, line 50, column (b)) from the balance sheet, or that reported the amount as zero. Often, these zero amounts are explained by trusts filing a final return.

[2] Taken from Form 5227, Part I, Section D, line 22. Total deductions may not equal the sum of deductions allocable to ordinary income (Section E, line 24a), capital gains (line 25a), and nontaxable income (line 26a). Deductions may also be allocated to corpus, but are not reported on Section E and are thus not shown separately in this table.

NOTE: Detail may not add to totals due to rounding.

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**Table 2. Charitable Remainder Annuity Trusts: Accumulation and Distribution Information, by Size of End-of-Year Book Value of Total Assets, Filing Year 2011**

[All figures are estimates based on samples—money amounts are in thousands of dollars]

Item	Total	Size of end-of-year book value of total assets				
		Under \$500,000 [1]	\$500,000 under \$1,000,000	\$1,000,000 under \$3,000,000	\$3,000,000 under \$10,000,000	\$10,000,000 or more
	(1)	(2)	(3)	(4)	(5)	(6)
<b>Number of returns</b>	<b>15,862</b>	<b>12,854</b>	<b>1,652</b>	<b>1,019</b>	<b>275</b>	<b>62</b>
<b>Total accumulations of income</b>	<b>3,751,601</b>	<b>734,678</b>	<b>475,703</b>	<b>728,272</b>	<b>776,974</b>	<b>1,035,974</b>
Net ordinary income	488,893	159,102	34,563	83,527	111,361	100,341
Net capital gains (losses)	3,091,968	538,523	411,576	618,252	600,824	922,794
Net nontaxable income	170,740	37,053	29,565	26,494	64,790	12,838
Prior-year undistributed income	3,415,048	647,500	437,186	652,454	716,296	961,611
Net ordinary income	320,368	120,769	* 9,813	46,892	83,457	59,436
Net capital gains (losses)	2,953,313	495,096	403,498	585,054	576,756	892,910
Net nontaxable income	141,366	31,635	23,875	20,508	56,082	9,266
Current year net income	336,554	87,177	38,517	75,818	60,679	74,362
Net ordinary income	168,525	38,332	24,750	36,634	27,903	40,905
Net capital gains (losses)	138,655	43,427	8,078	33,198	24,068	29,884
Net nontaxable income	29,374	5,418	5,690	5,986	8,708	3,573
<b>Distributions of income</b>	<b>444,201</b>	<b>156,934</b>	<b>72,010</b>	<b>89,144</b>	<b>68,169</b>	<b>57,944</b>
Net ordinary income	158,400	43,641	25,476	36,542	23,161	29,579
Net capital gains (losses)	256,910	106,510	37,927	46,542	38,151	27,780
Net nontaxable income	28,892	6,783	8,607	6,060	6,857	* 585
<b>Undistributed at end of year</b>	<b>3,307,399</b>	<b>577,743</b>	<b>403,693</b>	<b>639,128</b>	<b>708,806</b>	<b>978,030</b>
Net ordinary income	330,493	115,461	* 9,086	46,984	88,200	70,762
Net capital gains (losses)	2,835,058	432,012	373,649	571,710	562,673	895,014
Net nontaxable income	141,849	30,270	20,958	20,434	57,933	12,253

\* Estimate should be used with caution because of the small number of sample returns on which it is based.

[1] Includes returns that did not report the end-of-year book value of total assets (Form 5227, Part IV, line 50, column (b)) from the balance sheet, or that reported the amount as zero. Often, these zero amounts are explained by trusts filing a final return.

NOTE: Detail may not add to totals due to rounding.

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**Table 3. Charitable Remainder Annuity Trusts: Book Value Balance Sheet Information, by Size of End-of-Year Book Value of Total Assets, Filing Year 2011**

[All figures are estimates based on samples—money amounts are in thousands of dollars]

Item	Total	Size of end-of-year book value of total assets				
		Under \$500,000 [1]	\$500,000 under \$1,000,000	\$1,000,000 under \$3,000,000	\$3,000,000 under \$10,000,000	\$10,000,000 or more
		(1)	(2)	(3)	(4)	(5)
<b>Number of returns</b>	<b>15,862</b>	<b>12,854</b>	<b>1,652</b>	<b>1,019</b>	<b>275</b>	<b>62</b>
<b>Total net assets</b>	<b>7,136,591</b>	<b>1,411,278</b>	<b>1,183,074</b>	<b>1,646,130</b>	<b>1,357,376</b>	<b>1,538,732</b>
<b>Total assets</b>	<b>7,216,682</b>	<b>1,452,139</b>	<b>1,186,319</b>	<b>1,661,794</b>	<b>1,364,350</b>	<b>1,552,080</b>
Cash	210,922	27,198	37,063	34,203	29,301	83,157
Savings and temporary cash investments	522,445	95,714	86,646	128,188	74,623	137,273
Accounts receivable	5,804	2,173	* 1,421	793	* 44	* 1,373
Receivables due from officers, directors, trustees, etc.	* 2,228	* 134	* 482	* 1,612	0	0
Other notes and loans receivable	181,626	24,283	13,079	89,199	* 2,520	* 52,543
Inventories for sale or use	* 236	0	0	* 236	0	0
Prepaid expenses and deferred charges	634	* 23	* 64	* 325	* 204	* 17
Total investments	6,013,071	1,219,836	977,313	1,336,538	1,205,102	1,274,283
Securities	4,816,210	964,954	819,284	1,057,622	1,027,199	947,150
Government obligations	905,774	121,627	132,143	170,758	281,758	199,488
Corporate stock	3,002,368	638,022	530,054	674,169	569,115	591,007
Corporate bonds	908,068	205,305	157,087	212,695	176,326	156,655
Land, buildings, and equipment	76,047	* 12,920	* 8,178	32,468	* 19,420	* 3,060
Other investments	1,120,814	241,961	149,850	246,447	158,482	324,072
Charitable purpose land, buildings, and equipment	18,635	* 1,079	0	* 9,760	* 5,769	* 2,027
Other assets	261,081	81,699	70,251	60,939	46,786	* 1,406
<b>Total liabilities</b>	<b>80,091</b>	<b>40,861</b>	<b>3,245</b>	<b>15,664</b>	<b>6,974</b>	<b>13,348</b>
Accounts payable and accrued expenses	14,008	11,530	* 999	1,337	* 80	* 62
Deferred revenue	* 3,688	* 1,214	0	* 2,474	0	0
Loans from officers, directors, trustees, etc.	* 169	* 45	0	* 124	0	0
Mortgages and other notes payable	* 2,778	* 2,453	0	* 186	* 140	0
Other liabilities	59,448	25,619	2,246	11,543	6,755	13,286

\* Estimate should be used with caution because of the small number of sample returns on which it is based.

[1] Includes returns that did not report the end-of-year book value of total assets (Form 5227, Part IV, line 50, column (b)) from the balance sheet, or that reported the amount as zero.

Often, these zero amounts are explained by trusts filing a final return.

NOTE: Detail may not add to totals due to rounding.

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**Table 4. Charitable Remainder Unitrusts: Income and Deductions, by Size of End-of-Year Book Value of Total Assets, Filing Year 2011**

[All figures are estimates based on samples—money amounts are in thousands of dollars]

Item	Total	Size of end-of-year book value of total assets				
		Under \$500,000 [1]	\$500,000 under \$1,000,000	\$1,000,000 under \$3,000,000	\$3,000,000 under \$10,000,000	\$10,000,000 or more
	(1)	(2)	(3)	(4)	(5)	(6)
<b>Number of returns</b>	<b>93,828</b>	<b>67,211</b>	<b>13,897</b>	<b>9,366</b>	<b>2,642</b>	<b>713</b>
<b>Total net income (loss)</b>	<b>1,428,937</b>	<b>414,701</b>	<b>449,187</b>	<b>720,708</b>	<b>749,439</b>	<b>-905,099</b>
Net ordinary income	2,449,660	240,430	223,265	334,584	309,423	1,341,958
Total ordinary income	3,306,425	358,694	293,873	434,819	386,622	1,832,417
Interest income	684,784	64,135	53,806	100,235	87,496	379,111
Ordinary dividends and business income (loss)	1,763,298	256,223	184,804	283,194	256,707	782,371
Rents, royalties, partnerships, other estates and trusts, etc.	-508,613	12,725	8,385	9,245	11,848	-550,815
Farm income (loss)	* 968	0	0	* 871	* 97	0
Ordinary gain (loss)	-1,788	319	42	1,264	-2,196	-1,218
Other income	1,367,777	25,291	46,836	40,011	32,670	1,222,968
Deductions allocable to ordinary income	856,764	118,263	70,608	100,235	77,199	490,459
Net capital gains (losses)	-1,124,546	158,027	212,591	358,900	417,853	-2,271,917
Total capital gains (losses)	-1,056,467	170,764	221,676	369,837	427,060	-2,245,803
Total short-term capital gains (losses)	-2,661,785	51,326	37,162	61,084	29,916	-2,841,274
Total long-term capital gains (losses)	1,605,318	119,437	184,513	308,753	397,143	595,471
Deductions allocable to capital gains	68,079	12,737	9,085	10,938	9,207	26,113
Net nontaxable income	103,823	16,245	13,332	27,224	22,163	24,860
Total nontaxable income	122,251	18,971	16,408	33,307	25,515	28,049
Tax-exempt interest	105,272	10,048	14,032	30,074	24,480	26,638
Other nontaxable income	16,979	8,923	2,376	3,234	1,035	1,412
Deductions allocable to nontaxable income	18,428	2,726	3,077	6,083	3,353	3,190
<b>Total deductions [2]</b>	<b>947,267</b>	<b>135,048</b>	<b>82,864</b>	<b>117,642</b>	<b>91,951</b>	<b>519,762</b>
Interest	7,812	1,338	410	813	1,542	3,709
Taxes	22,723	1,714	451	2,230	1,196	17,132
Trustee fee	194,998	57,375	39,587	49,993	30,177	17,867
Attorney, accountant, and return preparer fees	64,117	26,670	9,970	12,380	9,454	5,643
Other allowable deductions	657,617	47,952	32,446	52,226	49,582	475,411

\* Estimate should be used with caution because of the small number of sample returns on which it is based.

[1] Includes returns that did not report the end-of-year book value of total assets (Form 5227, Part IV, line 50, column (b)) from the balance sheet, or that reported the amount as zero.

Often, these zero amounts are explained by trusts filing a final return.

[2] Taken from Form 5227, Part I, Section D, line 22. Total deductions may not equal the sum of deductions allocable to ordinary income (Section E, line 24a), capital gains (line 25a), and nontaxable income (line 26a). Deductions may also be allocated to corpus, but are not reported on Section E and are thus not shown separately in this table.

NOTE: Detail may not add to totals due to rounding.

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### Table 5. Charitable Remainder Unitrusts: Accumulation and Distribution Information, by Size of End-of-Year Book Value of Total Assets, Filing Year 2011

[All figures are estimates based on samples—money amounts are in thousands of dollars]

Item	Total	Size of end-of-year book value of total assets				
		Under \$500,000 [1]	\$500,000 under \$1,000,000	\$1,000,000 under \$3,000,000	\$3,000,000 under \$10,000,000	\$10,000,000 or more
(1)	(2)	(3)	(4)	(5)	(6)	
<b>Number of returns</b>	<b>93,828</b>	<b>67,211</b>	<b>13,897</b>	<b>9,366</b>	<b>2,642</b>	<b>713</b>
<b>Total accumulations of income</b>	<b>66,874,320</b>	<b>6,562,773</b>	<b>5,587,020</b>	<b>9,373,165</b>	<b>9,693,887</b>	<b>35,657,476</b>
Net ordinary income	11,297,284	397,763	308,173	614,090	586,669	9,390,588
Net capital gains (losses)	54,898,942	6,067,439	5,187,097	8,567,057	8,947,165	26,130,183
Net nontaxable income	678,095	97,570	91,749	192,018	160,053	136,705
Prior-year undistributed income	65,445,382	6,148,071	5,137,832	8,652,456	8,944,447	36,562,575
Net ordinary income	8,847,623	157,333	84,909	279,505	277,245	8,048,630
Net capital gains (losses)	56,023,487	5,909,413	4,974,506	8,208,157	8,529,312	28,402,100
Net nontaxable income	574,272	81,326	78,417	164,794	137,890	111,846
Current year net income	1,428,937	414,701	449,187	720,708	749,439	-905,099
Net ordinary income	2,449,660	240,430	223,265	334,584	309,423	1,341,958
Net capital gains (losses)	-1,124,546	158,027	212,591	358,900	417,853	-2,271,917
Net nontaxable income	103,823	16,245	13,332	27,224	22,163	24,860
<b>Distributions of income</b>	<b>4,960,413</b>	<b>788,959</b>	<b>569,456</b>	<b>870,196</b>	<b>780,116</b>	<b>1,951,686</b>
Net ordinary income	1,916,050	251,552	222,017	330,642	285,651	826,188
Net capital gains (losses)	2,990,130	526,638	337,268	524,820	482,100	1,119,304
Net nontaxable income	54,232	10,769	10,171	14,734	12,365	6,193
<b>Undistributed at end of year</b>	<b>61,913,907</b>	<b>5,773,813</b>	<b>5,017,564</b>	<b>8,502,969</b>	<b>8,913,771</b>	<b>33,705,790</b>
Net ordinary income	9,381,233	146,211	86,157	283,447	301,018	8,564,400
Net capital gains (losses)	51,908,811	5,540,801	4,849,830	8,042,237	8,465,065	25,010,878
Net nontaxable income	623,863	86,801	81,578	177,284	147,688	130,512

[1] Includes returns that did not report the end-of-year book value of total assets (Form 5227, Part IV, line 50, column (b)) from the balance sheet, or that reported the amount as zero. Often, these zero amounts are explained by trusts filing a final return.

NOTE: Detail may not add to totals due to rounding.

## Split-Interest Trusts, Filing Year 2011

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**Table 6. Charitable Remainder Unitrusts: Book Value Balance Sheet Information, by Size of End-of-Year Book Value of Total Assets, Filing Year 2011**

[All figures are estimates based on samples—money amounts are in thousands of dollars]

Item	Total	Size of end-of-year book value of total assets				
		Under \$500,000 [1]	\$500,000 under \$1,000,000	\$1,000,000 under \$3,000,000	\$3,000,000 under \$10,000,000	\$10,000,000 or more
	(1)	(2)	(3)	(4)	(5)	(6)
<b>Number of returns</b>	<b>93,828</b>	<b>67,211</b>	<b>13,897</b>	<b>9,366</b>	<b>2,642</b>	<b>713</b>
<b>Total net assets</b>	<b>86,901,148</b>	<b>11,668,938</b>	<b>9,713,830</b>	<b>14,870,406</b>	<b>13,180,605</b>	<b>37,467,369</b>
<b>Total assets</b>	<b>88,108,971</b>	<b>11,821,101</b>	<b>9,863,064</b>	<b>15,115,500</b>	<b>13,418,421</b>	<b>37,890,885</b>
Cash	1,778,276	242,773	180,912	278,310	256,216	820,063
Savings and temporary cash investments	3,999,287	674,147	571,422	855,896	789,228	1,108,594
Accounts receivable	168,995	28,704	37,583	27,096	15,761	59,852
Receivables due from officers, directors, trustees, etc.	20,516	1,752	* 1,055	5,071	* 1,212	* 11,425
Other notes and loans receivable	1,070,238	141,417	171,375	274,881	253,062	229,504
Inventories for sale or use	* 251	0	0	* 251	0	0
Prepaid expenses and deferred charges	27,914	1,346	* 5,391	1,140	1,021	19,017
Total investments	78,861,025	10,318,825	8,527,618	13,164,898	11,550,146	35,299,538
Securities	44,296,217	8,097,135	6,787,221	10,246,326	8,371,439	10,794,096
Government obligations	4,000,674	377,717	507,233	909,386	915,317	1,291,020
Corporate stock	33,059,877	6,345,621	5,074,576	7,703,576	6,262,131	7,673,973
Corporate bonds	7,235,666	1,373,797	1,205,412	1,633,364	1,193,991	1,829,102
Land, buildings, and equipment	925,885	114,505	100,439	303,767	155,765	251,409
Other investments	33,638,923	2,107,184	1,639,958	2,614,806	3,022,942	24,254,033
Charitable purpose land, buildings, and equipment	219,452	28,615	* 32,000	87,214	* 43,547	28,076
Other assets	1,963,011	383,517	335,707	420,741	508,229	314,817
<b>Total liabilities</b>	<b>1,207,822</b>	<b>152,162</b>	<b>149,234</b>	<b>245,094</b>	<b>237,816</b>	<b>423,516</b>
Accounts payable and accrued expenses	135,048	20,382	19,889	27,311	43,702	23,764
Deferred revenue	36,441	* 3,094	* 13,757	8,611	0	* 10,979
Loans from officers, directors, trustees, etc.	3,195	* 119	* 1,018	2,028	0	* 31
Mortgages and other notes payable	89,295	* 2,288	* 5,300	* 11,750	* 18,780	51,177
Other liabilities	943,843	126,280	109,271	195,393	175,335	337,565

\* Estimate should be used with caution because of the small number of sample returns on which it is based.

[1] Includes returns that did not report the end-of-year book value of total assets (Form 5227, Part IV, line 50, column (b)) from the balance sheet, or that reported the amount as zero. Often, these zero amounts are explained by trusts filing a final return.

NOTE: Detail may not add to totals due to rounding.

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**Table 7. Charitable Remainder Unitrusts: End-of-Year Fair Market Value Asset Information, by Size of End-of-Year Book Value of Total Assets, Filing Year 2011**

[All figures are estimates based on samples—money amounts are in thousands of dollars]

Item	Total	Size of end-of-year book value of total assets				
		Under \$500,000 [1]	\$500,000 under \$1,000,000	\$1,000,000 under \$3,000,000	\$3,000,000 under \$10,000,000	\$10,000,000 or more
	(1)	(2)	(3)	(4)	(5)	(6)
<b>Number of returns</b>	<b>93,828</b>	<b>67,211</b>	<b>13,897</b>	<b>9,366</b>	<b>2,642</b>	<b>713</b>
<b>Total assets</b>	<b>98,256,070</b>	<b>13,419,451</b>	<b>10,858,463</b>	<b>16,603,229</b>	<b>14,685,932</b>	<b>42,688,996</b>
Cash	1,808,512	254,497	191,278	285,547	256,108	821,082
Savings and temporary cash investments	3,978,710	672,910	568,580	847,154	794,354	1,095,712
Accounts receivable	145,234	18,861	27,860	25,977	15,590	56,946
Receivables due from officers, directors, trustees, etc.	20,350	1,666	* 1,055	4,950	* 1,212	* 11,468
Other notes and loans receivable	992,724	134,001	146,373	264,988	220,368	226,995
Inventories for sale or use	* 262	* 0	0	* 262	0	0
Prepaid expenses and deferred charges	27,439	1,334	* 5,391	1,000	705	19,009
Total investments	88,519,004	11,784,079	9,449,105	14,561,138	12,736,674	39,988,007
Securities	49,452,246	9,180,879	7,523,842	11,344,208	9,409,525	11,993,792
Government obligations	4,183,896	393,583	518,776	961,855	956,580	1,353,103
Corporate stock	37,710,726	7,318,496	5,743,041	8,660,215	7,181,927	8,807,046
Corporate bonds	7,557,625	1,468,800	1,262,026	1,722,139	1,271,017	1,833,643
Land, buildings, and equipment	1,249,449	326,370	153,035	393,730	183,492	192,822
Other investments	37,817,309	2,276,830	1,772,228	2,823,199	3,143,658	27,801,393
Charitable purpose land, buildings, and equipment	308,172	60,125	* 70,564	96,066	44,920	36,498
Other assets	2,455,658	491,974	398,257	516,147	616,002	433,278

\* Estimate should be used with caution because of the small number of sample returns on which it is based.

[1] Includes returns that did not report the end-of-year book value of total assets (Form 5227, Part IV, line 50, column (b)) from the balance sheet, or that reported the amount as zero. Often, these zero amounts are explained by trusts filing a final return.

NOTE: Detail may not add to totals due to rounding.

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**Table 8. Charitable Lead Trusts: Income, by Size of End-of-Year Book Value of Total Assets, Filing Year 2011**

[All figures are estimates based on samples—money amounts are in thousands of dollars]

Item	Total	Size of end-of-year book value of total assets				
		Under \$500,000 [1]	\$500,000 under \$1,000,000	\$1,000,000 under \$3,000,000	\$3,000,000 under \$10,000,000	\$10,000,000 or more
	(1)	(2)	(3)	(4)	(5)	(6)
<b>Number of returns</b>	6,617	2,864	1,436	1,306	706	305
<b>Total income (loss)</b>	<b>969,473</b>	<b>17,037</b>	<b>-13,746</b>	<b>-35,852</b>	<b>155,985</b>	<b>846,049</b>
Total ordinary income	953,844	44,806	33,241	71,494	160,000	644,303
Interest income	198,653	1,882	5,065	11,798	36,953	142,956
Ordinary dividends and business income (loss)	606,192	25,897	20,360	43,388	90,599	425,947
Rents, royalties, partnerships, other estates and trusts, etc.	126,318	16,933	5,525	13,992	30,134	59,734
Farm income (loss)	* 1,577	0	0	0	* 1,577	0
Ordinary gain (loss)	855	* -88	* -78	682	-400	738
Other income	20,250	182	2,369	1,634	1,136	14,928
Total capital gains (losses)	-15,676	-30,892	-48,736	-110,794	-14,606	189,352
Total short-term capital gains (losses)	-59,794	-10,184	-22,157	-50,366	-23,753	46,665
Total long-term capital gains (losses)	44,118	-20,708	-26,579	-60,428	9,147	142,687
Total nontaxable income	31,305	3,123	1,750	3,448	10,591	12,394
Tax-exempt interest	30,525	2,812	1,750	3,448	10,462	12,053
Other nontaxable income	780	* 310	0	* [2]	* 129	* 340

\* Estimate should be used with caution because of the small number of sample returns on which it is based.

[1] Includes returns that did not report the end-of-year book value of total assets (Form 5227, Part IV, line 50, column (b)) from the balance sheet, or that reported the amount as zero. Often, these zero amounts are explained by trusts filing a final return.

[2] Value is less than \$500.

NOTE: Detail may not add to totals due to rounding.

## Split-Interest Trusts, Filing Year 2011

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**Table 9. Charitable Lead Trusts: Book Value Balance Sheet Information, by Size of End-of-Year Book Value of Total Assets, Filing Year 2011**

[All figures are estimates based on samples—money amounts are in thousands of dollars]

Item	Total	Size of end-of-year book value of total assets				
		Under \$500,000 [1]	\$500,000 under \$1,000,000	\$1,000,000 under \$3,000,000	\$3,000,000 under \$10,000,000	\$10,000,000 or more
		(1)	(2)	(3)	(4)	(5)
<b>Number of returns</b>	<b>6,617</b>	<b>2,864</b>	<b>1,436</b>	<b>1,306</b>	<b>706</b>	<b>305</b>
<b>Total net assets</b>	<b>20,945,036</b>	<b>395,042</b>	<b>984,235</b>	<b>2,159,982</b>	<b>3,726,160</b>	<b>13,679,616</b>
<b>Total assets</b>	<b>21,297,988</b>	<b>432,673</b>	<b>1,002,296</b>	<b>2,192,307</b>	<b>3,807,886</b>	<b>13,862,825</b>
Cash	524,592	34,594	27,414	66,956	184,214	211,414
Savings and temporary cash investments	1,528,995	45,090	52,377	173,087	252,018	1,006,424
Accounts receivable	19,275	* 571	* 3,351	2,773	635	11,945
Receivables due from officers, directors, trustees, etc.	* 69,473	0	* 83	* 6,464	* 18,288	* 44,639
Other notes and loans receivable	307,039	* 988	* 1,673	36,854	45,168	222,356
Inventories for sale or use	0	0	0	0	0	0
Prepaid expenses and deferred charges	3,519	* 40	* 373	* 368	* 1,504	* 1,234
Total investments	18,210,866	333,595	869,519	1,868,078	3,197,531	11,942,144
Securities	8,786,014	225,898	701,468	1,256,549	1,725,795	4,876,303
Government obligations	786,754	19,562	41,376	96,722	142,100	486,994
Corporate stock	6,778,439	178,640	600,189	977,961	1,241,828	3,779,822
Corporate bonds	1,220,822	27,696	59,904	181,867	341,867	609,487
Land, buildings, and equipment	351,862	* 8,073	* 25,540	* 20,561	* 26,289	271,399
Other investments	9,072,990	99,625	142,510	590,968	1,445,446	6,794,441
Charitable purpose land, buildings, and equipment	* 40,507	0	0	* 10,388	* 12,073	* 18,045
Other assets	593,721	17,795	* 47,507	27,342	96,455	404,624
<b>Total liabilities</b>	<b>352,953</b>	<b>37,631</b>	<b>18,061</b>	<b>32,325</b>	<b>81,726</b>	<b>183,208</b>
Accounts payable and accrued expenses	54,407	* 1,963	* 1,756	3,807	10,723	36,157
Deferred revenue	* 35,922	* 585	0	0	* 35,263	* 74
Loans from officers, directors, trustees, etc.	* 1,265	* 241	0	* 1,024	0	0
Mortgages and other notes payable	47,073	* 2,161	* 19	* 4,117	* 2,157	38,619
Other liabilities	214,286	32,680	* 16,286	23,378	33,582	108,359

\* Estimate should be used with caution because of the small number of sample returns on which it is based.

[1] Includes returns that did not report the end-of-year book value of total assets (Form 5227, Part IV, line 50, column (b)) from the balance sheet, or that reported the amount as zero.

Often, these zero amounts are explained by trusts filing a final return.

NOTE: Detail may not add to totals due to rounding.

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**Table 10. Pooled Income Funds: Income, by Size of End-of-Year Book Value of Total Assets, Filing Year 2011**

[All figures are estimates based on samples—money amounts are in thousands of dollars]

Item	Total	Size of end-of-year book value of total assets				
		Under \$500,000 [1]	\$500,000 under \$1,000,000	\$1,000,000 under \$3,000,000	\$3,000,000 under \$10,000,000	\$10,000,000 or more
(1)	(2)	(3)	(4)	(5)	(6)	
<b>Number of returns</b>	<b>1,402</b>	<b>1,070</b>	<b>116</b>	<b>121</b>	<b>71</b>	<b>24</b>
<b>Total income (loss)</b>	<b>3,456</b>	<b>-1,333</b>	<b>-585</b>	<b>1,120</b>	<b>12,169</b>	<b>-7,915</b>
Total ordinary income	58,344	4,687	3,168	7,556	13,531	29,402
Interest income	29,133	1,360	* 634	2,769	7,275	17,095
Ordinary dividends and business income (loss)	29,458	3,313	2,537	4,766	6,249	12,593
Rents, royalties, partnerships, other estates and trusts, etc.	-309	0	* -3	* -3	0	* -303
Farm income (loss)	0	0	0	0	0	0
Ordinary gain (loss)	* [2]	0	* [2]	0	0	0
Other income	63	* 14	0	* 25	* 7	* 17
Total capital gains (losses)	-54,898	-6,021	-3,753	-6,444	-1,362	-37,317
Total short-term capital gains (losses)	-25,922	-275	* -357	-2,471	-2,593	-20,225
Total long-term capital gains (losses)	-28,976	-5,746	-3,396	-3,973	1,231	-17,092
Total nontaxable income	* 10	* 1	0	* 8	0	0
Tax-exempt interest	* 10	* 1	0	* 8	0	0
Other nontaxable income	0	0	0	0	0	0

\* Estimate should be used with caution because of the small number of sample returns on which it is based.

[1] Includes returns that did not report the end-of-year book value of total assets (Form 5227, Part IV, line 50, column (b)) from the balance sheet, or that reported the amount as zero. Often, these zero amounts are explained by funds filing a final return.

[2] Value is less than \$500.

NOTE: Detail may not add to totals due to rounding.

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**Table 11. Pooled Income Funds: Book Value Balance Sheet Information, by Size of End-of-Year Book Value of Total Assets, Filing Year 2011**

[All figures are estimates based on samples—money amounts are in thousands of dollars]

Item	Total	Size of end-of-year book value of total assets				
		Under \$500,000 [1]	\$500,000 under \$1,000,000	\$1,000,000 under \$3,000,000	\$3,000,000 under \$10,000,000	\$10,000,000 or more
	(1)	(2)	(3)	(4)	(5)	(6)
<b>Number of returns</b>	<b>1,402</b>	<b>1,070</b>	<b>116</b>	<b>121</b>	<b>71</b>	<b>24</b>
<b>Total net assets</b>	<b>1,311,456</b>	<b>127,767</b>	<b>82,384</b>	<b>192,575</b>	<b>365,321</b>	<b>543,408</b>
<b>Total assets</b>	<b>1,452,400</b>	<b>128,103</b>	<b>82,406</b>	<b>196,215</b>	<b>365,499</b>	<b>680,176</b>
Cash	10,682	964	0	2,156	* 2,705	4,857
Savings and temporary cash investments	48,516	8,383	* 5,511	5,813	16,961	11,848
Accounts receivable	1,228	* 12	* 60	* 9	* 17	* 1,130
Receivables due from officers, directors, trustees, etc.	* 1	0	0	0	* 1	0
Other notes and loans receivable	* 11,451	0	0	* 39	0	* 11,411
Inventories for sale or use	0	0	0	0	0	0
Prepaid expenses and deferred charges	* 250	0	0	0	* 250	0
Total investments	1,323,190	97,435	76,834	176,885	329,254	642,782
Securities	1,139,450	84,020	* 62,460	161,144	266,991	564,835
Government obligations	98,201	8,782	* 2,575	7,513	32,623	* 46,708
Corporate stock	557,564	29,529	* 25,199	57,124	97,109	348,603
Corporate bonds	483,685	45,709	* 34,685	96,507	137,259	169,524
Land, buildings, and equipment	* 28,372	0	0	* 23	0	* 28,349
Other investments	155,369	13,415	* 14,375	15,718	62,264	49,598
Charitable purpose land, buildings, and equipment	* 8,061	0	0	0	0	* 8,061
Other assets	49,020	21,310	0	* 11,313	* 16,311	* 86
<b>Total liabilities</b>	<b>140,943</b>	<b>336</b>	<b>* 22</b>	<b>3,640</b>	<b>* 178</b>	<b>136,767</b>
Accounts payable and accrued expenses	3,752	* 88	* 22	* 138	0	3,505
Deferred revenue	* 104,193	0	0	* 2,948	0	* 101,245
Loans from officers, directors, trustees, etc.	0	0	0	0	0	0
Mortgages and other notes payable	* 29,157	0	0	0	0	* 29,157
Other liabilities	3,841	* 249	0	* 555	* 178	* 2,860

\* Estimate should be used with caution because of the small number of sample returns on which it is based.

[1] Includes returns that did not report the end-of-year book value of total assets (Form 5227, Part IV, line 50, column (b)) from the balance sheet, or that reported the amount as zero. Often, these zero amounts are explained by funds filing a final return.

NOTE: Detail may not add to totals due to rounding.

# Domestic Private Foundations and Related Excise Taxes, Tax Year 2009

by Cynthia Belmonte

**D**omestic private foundations filed 92,624 Forms 990-PF for Tax Year 2009, an increase of 2.0 percent over Tax Year 2008. These organizations held \$588.5 billion in total assets for Tax Year 2009, an increase in real terms of 10.5 percent over the previous year.<sup>1</sup> Despite the double-digit increase, total assets were still significantly less than the \$674.0 billion reported for Tax Year 2007, before the recession fully took hold of the domestic economy. Figure A includes selected financial data for Tax Years 2007 through 2009 for domestic private foundations. For most asset types, amounts increased between Tax Years 2008 and 2009. However, for the most liquid asset types, cash and savings and temporary cash investments, values decreased 7.9 percent and 6.3 percent, respectively.

Investment assets, which provide the basis for foundation giving, accounted for almost 92 percent of the total asset value reported by private foundations for Tax Year 2009. The total amount of investment assets held by private foundations increased 11.3 percent, from \$485.1 billion to \$539.8 billion, between Tax Years 2008 and 2009. Of all investment types, corporate stock increased the most in dollar terms, from \$219.2 billion to \$234.4 billion, during that period. In percentage terms, corporate bonds gained the most, 20.6 percent, from \$38.0 billion to \$45.8 billion, for the same time frame.

Despite decreases in contributions, gifts, and grants received; dividends and interest from securities; and interest on savings, total revenue increased 3.8 percent between Tax Year 2008 and Tax Year 2009. This was a significant improvement over the 54.6-percent decrease in total revenue reported for the preceding time frame. Private foundations reported \$5.6 billion of net losses from sales of assets, less than the \$10.0 billion in losses for Tax Year 2008. Though down 4.4 percent compared to the previous year, contributions, gifts, and grants received remained the largest source of revenue, totaling \$42.4 billion in Tax Year 2009.

Total expenses incurred by private foundations decreased 8.0 percent between Tax Year 2008 and Tax Year

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2009. Disbursements for charitable purposes, which include contributions, gifts, and grants paid as well as private foundations' operating and administrative expenses, decreased 4.4 percent. Private foundations distributed \$40.9 billion in contributions, gifts, and grants to the charitable sector, a 5.6-percent decrease from Tax Year 2008.

## The Statistics of Income Study

The Statistics of Income (SOI) Division conducts an annual study of private foundations based on the information returns filed with the Internal Revenue Service (IRS). The statistics presented in this article are based on a sample of Forms 990-PF, *Return of Private Foundation (or Section 4947(a)(1) Charitable Trust Treated as a Private Foundation)*, filed by domestic private foundations—private foundations organized in the United States—selected to represent the entire filing population for Tax Year 2009. Additional statistics on reported excise taxes on the activities described in Internal Revenue Code (IRC) sections 4941–4945 are from Forms 4720, *Return of Certain Excise Taxes on Charities and Other Persons Under Chapters 41 and 42 of the Internal Revenue Code*, filed by domestic private foundations. Tax Year 2009 includes all accounting periods beginning in Calendar Year 2009 and thus ending between December 31, 2009, and November 30, 2010. Consequently, the returns reflect financial activity that occurred in either Calendar Year 2009 or 2010 or some portion of both (see the Data Sources and Limitations section for further information).

## Tax Definitions and Organizational Structure

Public charities and private foundations that are created and operated for religious, charitable, scientific, educational, and certain other designated purposes can qualify for exemption from Federal income tax under IRC section 501(c)(3). Most tax-exempt organizations are hospitals, schools, churches, and organizations that receive broad support from the general public. These types of tax-exempt organizations, commonly known as “public charities,” file Form 990, *Return of Organization Exempt from Income Tax*, or Form 990-EZ, the short version of this information return.<sup>2</sup>

<sup>1</sup> Dollar values were adjusted for inflation based on the 2005 chain-type price index for Gross Domestic Product, as published by the U.S. Department of Commerce, Bureau of Economic Analysis. Inflation-adjusted money amounts were calculated in 2009 constant dollars and are referred to in this article as “constant dollars” or “real dollars.”

<sup>2</sup> For additional discussion of organizations other than private foundations that are tax exempt under IRC section 501(c)(3), see Arnsberger, Paul, “Nonprofit Charitable Organizations, 2009,” *Statistics of Income Bulletin*, Fall 2012, Volume 32, Number 2.

# Domestic Private Foundations and Related Excise Taxes, Tax Year 2009

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## Figure A

### Domestic Private Foundations: Selected Financial Items and Percentage Changes, in Constant Dollars, Tax Years 2007–2009

[All figures are estimates based on samples—money amounts are in millions of dollars]

Item	Tax year			Percentage change	
	2007	2008	2009	Tax Years 2007–2008	Tax Years 2008–2009
	(1)	(2)	(3)	(4)	(5)
<b>Number of returns</b>	<b>84,613</b>	<b>90,850</b>	<b>92,624</b>	<b>7.4</b>	<b>2.0</b>
<b>Total assets (fair market value)</b>	<b>673,972</b>	<b>532,851</b>	<b>588,535</b>	<b>-20.9</b>	<b>10.5</b>
Cash (non-interest bearing accounts)	7,684	8,307	7,654	8.1	-7.9
Investment assets, total	628,798	485,067	539,849	-22.9	11.3
Savings and temporary cash investments	49,134	48,917	45,838	-0.4	-6.3
Investments in securities, total	413,531	291,059	324,673	-29.6	11.5
Government obligations	37,317	33,795	35,415	-9.4	4.8
Corporate stock	333,966	219,242	243,423	-34.4	11.0
Corporate bonds	42,248	38,021	45,835	-10.0	20.6
Other investments [1]	166,133	145,091	169,338	-12.7	16.7
<b>Total revenue</b>	<b>110,845</b>	<b>50,270</b>	<b>52,179</b>	<b>-54.6</b>	<b>3.8</b>
Contributions, gifts, and grants received	50,008	44,312	42,380	-11.4	-4.4
Net gain (less loss) from sales of assets	39,981	-10,009	-5,556	-125.0	44.5
Gain	41,158	9,150	7,020	-77.8	-23.3
Loss	1,177	19,159	12,576	1,527.8	34.4
Dividends and interest from securities	13,583	11,321	9,030	-16.7	-20.2
Interest on savings	2,901	2,119	1,381	-27.0	-34.8
<b>Total expenses</b>	<b>60,690</b>	<b>61,045</b>	<b>56,185</b>	<b>0.6</b>	<b>-8.0</b>
Disbursements for charitable purposes	50,799	50,288	48,062	-1.0	-4.4
Contributions, gifts, and grants paid	43,983	43,336	40,914	-1.5	-5.6
Operating expenses	4,732	6,952	7,148	46.9	2.8
<b>Excess of revenue over expenses</b>	<b>50,155</b>	<b>-10,776</b>	<b>-4,006</b>	<b>-121.5</b>	<b>62.8</b>

[1] Sum of "Investments in land, buildings, and equipment (less accumulated depreciation)," "Investments in mortgage loans," and miscellaneous items such as advances; certificates of investment; and investments in art, coins, gold, and gems.

NOTE: Money amounts are in 2009 "constant dollars" and have been adjusted for inflation based on the 2005 chain-type price index for Gross Domestic Product, as published by the U.S. Department of Commerce, Bureau of Economic Analysis. Detail may not add to totals because of rounding.

In contrast to a public charity, a private foundation relies on a narrow sphere of support, typically through funding from a small number of private donors. Additionally, control of a private foundation is generally limited to an individual, family, or corporation. Some private foundations operate their own charitable programs, but the vast majority of private foundations support charitable activities through grants to individuals or other tax-exempt organizations.

Private foundations are subject to a variety of IRS regulations regarding their activities. Private foundations use the annual information return Form 990-PF to report detailed financial information as well as compliance with IRS regulations. Certain nonexempt charitable trusts that are treated as private foundations for tax purposes are also required to file this return. Though exempt from

income tax, private foundations are required to pay annually an excise tax on their net investment incomes. Additionally, private foundations and foundation managers are required to file Form 4720 to report excise taxes on certain prohibited activities.

### Composition of Filers

Depending upon the type of charitable support that a private foundation provides, it may be classified as either "nonoperating" or "operating."<sup>3</sup> A nonoperating foundation supports charitable programs indirectly, providing grants to other charitable organizations, rather than operating programs of its own. In contrast, an operating foundation generally spends its income or assets on direct, active involvement in a tax-exempt, charitable activity, such as operating a library or museum, providing

<sup>3</sup> An organization's status as a nonoperating or operating foundation was indicated on Form 990-PF, Part VII-A, line 9.

# Domestic Private Foundations and Related Excise Taxes, Tax Year 2009

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housing or healthcare, or conducting scientific research. In order to qualify as operating, a foundation must meet both an “income test” and one of three other tests: an “assets test,” an “endowment test,” or a “support test.”<sup>4</sup>

Figure B presents financial data for Tax Year 2009, by asset-size class, for all foundations, and for nonoperating and operating foundations, separately.<sup>5</sup> Although more than two-thirds of all returns filed by private foundations for Tax Year 2009 were filed by foundations with less than \$1 million of total assets, combined, these organizations held less than 3 percent of the total assets. The

largest foundations, those holding total assets valued at \$100 million or more, represented less than 1 percent of all returns filed for Tax Year 2009; however, these organizations held 58.6 percent of total assets.

The smallest foundations earned 8.1 percent of total revenue and accounted for 10.0 percent of the total amount disbursed for charitable purposes. The largest foundations accounted for more than half of total revenue and more than 45 percent of disbursements for charitable purposes and contributions, gifts, and grants paid by domestic private foundations for Tax Year 2009.<sup>6</sup>

## Figure B

### Domestic Private Foundations: Selected Financial Items, by Operating Status and Size of End-of-Year Fair Market Value of Total Assets, Tax Year 2009

[Money amounts are in millions of dollars]

Operating status and asset size [1]	Returns		Total assets (fair market value)		Total revenue		Disbursements for charitable purposes		Contributions, gifts, and grants paid	
	Number	Percentage of total	Amount	Percentage of total	Amount	Percentage of total	Amount	Percentage of total	Amount	Percentage of total
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	
<b>All foundations</b>	<b>92,624</b>	<b>100.0</b>	<b>588,535</b>	<b>100.0</b>	<b>52,179</b>	<b>100.0</b>	<b>48,062</b>	<b>100.0</b>	<b>40,914</b>	<b>100.0</b>
Less than \$1,000,000	61,883	66.8	15,558	2.6	4,224	8.1	4,784	10.0	3,523	8.6
\$1,000,000 less than \$10,000,000	24,520	26.5	77,041	13.1	6,841	13.1	7,186	15.0	6,233	15.2
\$10,000,000 less than \$50,000,000	4,776	5.2	99,584	16.9	10,181	19.5	9,860	20.5	8,470	20.7
\$50,000,000 less than \$100,000,000	740	0.8	51,200	8.7	3,600	6.9	4,229	8.8	3,682	9.0
\$100,000,000 or more	705	0.8	345,152	58.6	27,334	52.4	22,003	45.8	19,005	46.5
<b>Nonoperating foundations</b>	<b>84,660</b>	<b>91.4</b>	<b>539,712</b>	<b>91.7</b>	<b>44,571</b>	<b>85.4</b>	<b>42,153</b>	<b>87.7</b>	<b>38,422</b>	<b>93.9</b>
Less than \$1,000,000	55,923	60.4	14,714	2.5	2,959	5.7	3,713	7.7	3,464	8.5
\$1,000,000 less than \$10,000,000	23,021	24.9	72,272	12.3	5,626	10.8	6,374	13.3	5,962	14.6
\$10,000,000 less than \$50,000,000	4,395	4.7	91,598	15.6	7,252	13.9	7,530	15.7	6,892	16.8
\$50,000,000 less than \$100,000,000	682	0.7	47,301	8.0	2,865	5.5	3,660	7.6	3,270	8.0
\$100,000,000 or more	639	0.7	313,828	53.3	25,870	49.6	20,876	43.4	18,833	46.0
<b>Operating foundations</b>	<b>7,964</b>	<b>8.6</b>	<b>48,823</b>	<b>8.3</b>	<b>7,608</b>	<b>14.6</b>	<b>5,909</b>	<b>12.3</b>	<b>2,491</b>	<b>6.1</b>
Less than \$1,000,000	5,960	6.4	844	0.1	1,265	2.4	1,071	2.2	58	0.1
\$1,000,000 less than \$10,000,000	1,499	1.6	4,769	0.8	1,215	2.3	812	1.7	271	0.7
\$10,000,000 less than \$50,000,000	381	0.4	7,986	1.4	2,928	5.6	2,330	4.8	1,578	3.9
\$50,000,000 less than \$100,000,000	58	0.1	3,899	0.7	735	1.4	570	1.2	412	1.0
\$100,000,000 or more	66	0.1	31,324	5.3	1,464	2.8	1,127	2.3	173	0.4

[1] Foundations were assigned to asset-size classes based on the reported current dollar end-of-year fair market value of total assets.

NOTE: Detail may not add to totals because of rounding.

<sup>4</sup> A foundation could qualify as operating under the income requirement if it spent at least 85 percent of the lesser of its “minimum investment return” or “adjusted net income” on the direct, active conduct of tax-exempt, charitable activities. Adjusted net income represented the amount of income from charitable functions, investment activities, set-asides, unrelated business activities, and short-term capital gains that exceeded the cost incurred in earning the income and was calculated in Part I, column (c), of Form 990-PF for operating foundations. To meet the assets test, a foundation had to use 65 percent or more of its assets directly for the active conduct of charitable activities. To meet the endowment test, a foundation regularly had to make distributions for the active conduct of charitable activities in an amount not less than two-thirds of its “minimum investment return.” To meet the support test, a foundation regularly had to receive substantially all of its support (other than from gross investment income) from the public or from five or more qualifying exempt organizations, and (a) no more than 25 percent of its support (other than from gross investment income) from any one such qualifying exempt organization; and (b) no more than 50 percent of its support from gross investment income. See “Operating Foundations” in the Explanation of Selected Terms section of this article for additional information.

<sup>5</sup> Foundations were assigned to asset-size classes based on the reported end-of-year fair market value of total assets.

<sup>6</sup> Disbursements for charitable purposes include contributions, gifts, and grants paid, as well as expenses related to the foundation’s charitable purpose, such as employee salaries and wages, occupancy, and printing and publications.

Nonoperating foundations are by far the most common type of Form 990-PF filer and conduct the majority of financial activity that is attributable to private foundations. For Tax Year 2009, nonoperating foundations accounted for 91.4 percent of Forms 990-PF filed by domestic private foundations, and they held a similar proportion of the aggregate value of total assets. Nonoperating foundations also earned the majority of total revenue, and, because they primarily supported charitable activities via indirect distributions, accounted for nearly all of the contributions, gifts, and grants reported.

## The Private Foundation Rules

Since private foundations are typically supported and controlled by an individual, family, or corporation, they are not directly accountable to the public. Consequently, private foundations are subject to greater Federal regulation than other tax-exempt organizations. For example, private foundations are required annually to distribute their minimum investment return, statutorily defined as 5 percent of the net value of their investment assets, after certain adjustments. The Tax Reform Act of 1969 (TRA69) established taxes specific to private foundations and was the basis for IRC sections 4940–4945. IRC section 4940 includes an excise tax on “net investment income,” which consists of income received only from investments that are unrelated to a foundation’s charitable purpose. This tax, which is reported annually on Form 990-PF, applies to all nonoperating foundations and to most operating foundations that earn net investment income.

IRC sections 4941–4945 outline taxes imposed on foundations that engage in activities that are considered to be contrary to the public interest. Figure C provides detailed descriptions of taxable activities under IRC sections 4941–4945, as well as the tax rates associated with each section. Private foundations report taxes on the activities described in IRC sections 4941–4945 on Form 4720. Taxes reported on Form 4720 are initial taxes; these first-tier taxes are assessed automatically when a prohibited activity occurs. If a foundation, after paying their 4720 excise tax, fails to provide corrective action, the foundation may be subject to an additional second-tier tax.<sup>7</sup>

Excise taxes under IRC sections 4940 through 4945 can be divided into two primary categories—organizational

and individual. The most common organizational excise tax is levied on net investment income under IRC section 4940. Additionally, foundations that engage in prohibited activities are subject to organizational excise taxes on undistributed income, investments that jeopardize charitable purpose, excess business holdings, and taxable expenditures. Individual excise taxes include many of the organizational taxes, but are imposed on foundation managers who knowingly engage in the prohibited activity. Self-dealing tax is the only excise tax defined under IRC sections 4940 through 4945 that does not have an organizational component. A self-dealer, defined as a disqualified person benefiting from a prohibited transaction with a foundation, is liable for self-dealing tax. Additionally, foundation managers who knowingly participate in acts of self-dealing are also subject to excise taxes.

Figure D shows excise tax data for Tax Years 2008 and 2009, classified by organizational or individual excise taxes. The number of organizations and individuals that incurred excise taxes under IRC sections 4940–4945 decreased, as did the amount of total taxes reported between Tax Years 2008 and 2009. This was attributable to the significant decrease in reported taxes on net investment income, which fell by 24.5 percent. The remainder of the article examines IRC section 4940–4945 excise taxes reported for Tax Year 2009 in detail.

## Investment Assets and the Section 4940 Tax on Investment Income

Assets that are held for investment purposes only, such as securities, investments in art, coins or other collectables, and real estate, are classified as noncharitable-use assets. For nonoperating foundations, noncharitable-use assets typically represent the majority of total assets. Most types of noncharitable-use assets, including cash and securities, are valued based on their average monthly fair market values throughout the tax year, while total assets are valued at year’s end.<sup>8</sup> Figure E presents aggregate total assets and noncharitable-use assets held by domestic nonoperating private foundations, as well as net investment income, for Tax Years 2008 and 2009. Despite an overall real increase of 12.0 percent in nonoperating foundations’ aggregate total assets between Tax Years 2008 and 2009, the net value of noncharitable-use assets held for investment purposes decreased 10.7 percent over the same period.

<sup>7</sup> Additional levels of tax are not reported on the Form 4720; rather, they are handled independently between the IRS and the foundation and/or foundation manager.

<sup>8</sup> Other types of noncharitable-use assets are valued annually, although not necessarily at year’s end.

# Domestic Private Foundations and Related Excise Taxes, Tax Year 2009

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## Figure C

### Excise Taxes on Prohibited Activities Described Under Internal Revenue Code Sections 4941-4945

Code section	Name of tax	Description	Tax rate [1], [2]
4941	Self-Dealing	(1) Selling, exchanging, or leasing of property to a disqualified person.  (2) Borrowing money from, lending money to, or otherwise extending credit to a disqualified person.  (3) Furnishing goods, services, or facilities to a disqualified person.  (4) Paying compensation to, or paying or reimbursing the expenses of, a disqualified person.  (5) Transferring any income or assets to a disqualified person.  (6) Paying money or property to a Government official.	10-percent initial tax per act per year on Self-Dealer.  5 percent per year and limited to \$20,000 per act on Foundation Managers.
4942	Undistributed Income	Failing to distribute the minimum required amount.	30-percent initial tax on current and previous years' undistributed amount.
4943	Excess Business Holdings	Holding more than 20-percent interest in an unrelated business enterprise.	10-percent initial tax on excess amount and 200 percent if not disposed of within tax period.
4944	Investments that Jeopardize Charitable Purpose	Failing to exercise ordinary business care to provide for the long- and short-term financial needs of the foundation.	10-percent initial tax of amount invested per year on Foundation.  10-percent initial tax of amount invested per year on Foundation Manager and limited to \$10,000 for any one investment.
4945	Taxable Expenditures	(1) Carrying on propaganda or otherwise influence any legislation through:  (a) Attempting to influence public opinion or any segment of it, and  (b) Communicating with any member or employee of a legislative body, or with any other Government official or employee who may take part in formulating legislation.  (2) Influencing the outcome of any specific public election, or to conduct, directly or indirectly, any voter registration drive.  (3) Providing a grant to an individual for travel, study, or other purposes.  (4) Providing a grant to an organization not described in section 509(a)(1), (2), or (3) or that is not an exempt operating foundation.  (5) Acting with any other than religious, charitable, scientific, literary, educational, or public purposes, or the prevention of cruelty to children or animals.	20-percent initial tax of expenditure on Foundation.  5-percent initial tax up to \$10,000 on Foundation Managers.

[1] Taxes on Foundation Managers require that the manager knew the action was a taxable act and the manager participated willingly.

[2] Tax rates and amounts reflect legislation included in the Pension Protection Act of 2006 (PPA), which doubled the penalty excise taxes effective for taxable years beginning after August 17, 2006.

## Domestic Private Foundations and Related Excise Taxes, Tax Year 2009

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### Figure D

#### IRC Sections 4940-4945 Excise Taxes Reported by Domestic Private Foundations, and Percentage Changes, in Constant Dollars, Tax Years 2008 and 2009 [1]

[Money amounts are in thousands of dollars]

Internal Revenue Code section and item [2]	Number of returns			Amount involved in act			Tax amount		
	2008	2009	Percentage change	2008	2009	Percentage change	2008	2009	Percentage change
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)
<b>Taxes on organizations [3]</b>									
Section 4940 tax on net investment income	69,313	66,743	-3.7	23,371,332	17,254,016	-26.2	292,537	220,966	-24.5
Section 4942 tax on undistributed income	1,350	1,285	-4.8	25,189	20,833	-17.3	7,557	6,250	-17.3
Section 4943 tax on excess business holdings	** 73	5	N/A	** 2,357	13,714	N/A	** 405	1,371	N/A
Section 4945 tax on taxable expenditures	98	N/A		3,183	N/A		637	N/A	
<b>Taxes on individuals [4]</b>									
Section 4941 tax on self-dealing	134	107	-20.1	10,745	14,921	38.9	1,270	1,707	34.4
Section 4945 tax on taxable expenditures	12	13	8.3	294	72	-75.6	15	4	-73.6

\*\* Data combined to prevent disclosure of specific taxpayer data.

N/A—Not applicable.

[1] Excise tax under IRC section 4940 is reported on the Form 990-PF, while the taxes under IRC sections 4941-4945 are reported on the Form 4720. The tax year data include Forms 990-PF and Forms 4720 filed and processed during the two calendar years immediately following the tax year.

[2] There were no Form 4720 returns filed by foundations reporting section 4944 taxes on jeopardizing investments for the time period covered.

[3] Organization taxes are reported by private foundations.

[4] Individual taxes are reported by foundations managers, office directors, trustees, and other individuals.

NOTE: Money amounts are in 2009 "constant dollars" and have been adjusted for inflation based on the 2005 chain-type price index for Gross Domestic Product, as published by the U.S. Department of Commerce, Bureau of Economic Analysis. Detail may not add to totals because of rounding.

### Figure E

#### Domestic Nonoperating Private Foundations: Total Assets, Noncharitable-Use Assets, and Net Investment Income, by Size of End-of-Year Fair Market Value of Total Assets, in Constant Dollars, Tax Years 2008–2009

[All figures are estimates based on samples—money amounts are in millions of dollars]

Asset size [1]	Number of returns			Total assets (fair market value)		
	2008	2009	Percentage change	2008	2009	Percentage change
	(1)	(2)	(3)	(4)	(5)	(6)
<b>All nonoperating foundations</b>						
83,024	84,660	2.0	481,924	539,712	12.0	
Less than \$1,000,000	56,638	55,923	-1.3	14,782	14,714	-0.5
\$1,000,000 less than \$10,000,000	21,196	23,021	8.6	65,896	72,272	9.7
\$10,000,000 less than \$50,000,000	3,975	4,395	10.6	82,599	91,598	10.9
\$50,000,000 less than \$100,000,000	649	682	5.1	44,763	47,301	5.7
\$100,000,000 or more	565	639	13.1	273,884	313,828	14.6
Asset size [1]	Noncharitable-use assets [2]			Net investment income		
	2008	2009	Percentage change	2008	2009	Percentage change
	(7)	(8)	(9)	(10)	(11)	(12)
<b>All nonoperating foundations</b>						
523,014	467,188	-10.7	22,091	16,612	-24.8	
Less than \$1,000,000	17,029	13,473	-20.9	736	550	-25.3
\$1,000,000 less than \$10,000,000	72,791	64,904	-10.8	3,386	2,390	-29.4
\$10,000,000 less than \$50,000,000	89,559	81,378	-9.1	4,151	3,063	-26.2
\$50,000,000 less than \$100,000,000	47,928	41,874	-12.6	1,952	1,575	-19.3
\$100,000,000 or more	295,707	265,559	-10.2	11,866	9,034	-23.9

[1] Foundations were assigned to asset-size classes based on the constant dollar end-of-year fair market value of total assets for each tax year.

[2] While not common, the fair market value of noncharitable-use assets can exceed the ending fair market value of total assets because of the different methods used for calculating the two values. Most types of noncharitable-use assets, including cash and securities, are valued based on their average monthly fair market values throughout the tax year, while total assets are valued at year end.

NOTE: Money amounts are in 2009 "constant dollars" and have been adjusted for inflation based on the 2005 chain-type price index for Gross Domestic Product, as published by the U.S. Department of Commerce, Bureau of Economic Analysis. Detail may not add to totals because of rounding.

# Domestic Private Foundations and Related Excise Taxes, Tax Year 2009

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Income received from investment assets decreased significantly between Tax Years 2008 and 2009. Realized net investment income reported by private foundations included net income from capital gains, along with interest, dividends, rents, and royalties, after deductions for expenses incurred in producing the investment income. Domestic nonoperating private foundations reported \$16.6 billion in net investment income, a 24.8-percent decrease from the \$22.1 billion in 2008.

The “net investment income yield” and “real rates of total return on assets” can provide additional insight into both the realized income from, and the overall performance of, investment assets. Figure F shows these measures for domestic nonoperating foundations for Tax Years 2008 and 2009. Both the mean and the median, which minimizes the influences of large outliers in the data and may therefore better represent a typical foundation than the mean value, are shown. In order to compare investment performance by foundation size over a given tax year, foundations were classified based on their fair market value of assets at the beginning of the year.

The net investment income yield, a measure of the realized investment income that a foundation earns on its

investment assets, was calculated by dividing net investment income by the value of noncharitable-use assets. The median net investment income yield realized by domestic nonoperating private foundations fell slightly, from 2.4 percent for Tax Year 2008 to 1.9 percent for Tax Year 2009. Median net investment income yields varied little among foundations in the different asset-size classes. Median net investment income yields generally increased with the size of the foundation, with the smallest foundations reporting the lowest median net investment income yield, at 1.5 percent. Foundations with \$10 million to \$100 million in total assets had the highest median net investment income yield (2.4 percent), while the largest foundations realized slightly lower median net investment income yields of 2.1 percent.

The real rate-of-total-return formula, which measures the total, inflation-adjusted capital appreciation of a foundation’s assets, equals the change in the value of the entire asset base (adjusted for contributions received, grants paid, and certain expenses) divided by the value of the base. Because the real rate of total return on assets measures the realized income from investments and other assets, as well as the unrealized appreciation or

## Figure F

### Domestic Nonoperating Private Foundation Net Investment Income Yields and Real Rates of Total Return on Assets, by Size of Beginning-of-Year Fair Market Value of Total Assets, Tax Years 2008–2009 [1]

Tax year, asset size [2]	Net investment income yields (percentages)			Real rates of total return on assets (percentages)		
	Median	Mean	Standard deviation	Median	Mean	Standard deviation
	(1)	(2)	(3)	(4)	(5)	(6)
<b>Tax Year 2008, Nonoperating foundations</b>						
Less than \$1,000,000	2.4	7.4	236.8	-15.7	-9.7	272.6
\$1,000,000 less than \$10,000,000	2.0	7.5	306.9	-8.7	-3.9	855.0
\$10,000,000 less than \$50,000,000	2.7	7.8	464.8	-21.9	-19.5	63.3
\$50,000,000 less than \$100,000,000	2.6	4.6	11.6	-21.6	-17.9	43.2
\$100,000,000 or more	2.5	7.5	93.2	-22.2	-19.0	15.9
	2.5	4.0	9.8	-24.6	-21.4	14.8
<b>Tax Year 2009, Nonoperating foundations</b>						
Less than \$1,000,000	1.9	6.1	129.5	11.1	33.9	1,424.6
\$1,000,000 less than \$10,000,000	1.5	6.5	273.9	8.5	43.4	4,286.1
\$10,000,000 less than \$50,000,000	2.3	5.8	189.8	13.7	14.8	85.6
\$50,000,000 less than \$100,000,000	2.4	4.5	32.9	13.4	15.0	37.0
\$100,000,000 or more	2.4	3.8	6.1	13.2	14.2	17.0
	2.1	3.2	5.7	14.1	14.7	14.9

[1] Only data from returns that were included in the sample for 2 consecutive tax years were used in the calculations. For example, the Tax Year 2009 net investment income yield and rate of return on total assets were calculated only for organizations that filed sampled returns for each of Tax Years 2008 and 2009. Thus, approximately 76 percent of returns for nonoperating foundations included in the Tax Year 2009 sample were eligible for this analysis. Eligible returns represented 91 percent of the Tax Year 2008 sample. Because some organizations may have exited the sample in consecutive years due to decreases in their fair market values of total assets, these results may reflect some bias toward organizations with positive investment performance.

[2] Foundations were assigned to asset-size classes based on the constant dollar beginning-of-year fair market value of total assets for each tax year.

NOTE: Money amounts are in 2009 "constant dollars" and have been adjusted for inflation based on the 2005 chain-type price index for Gross Domestic Product, as published by the U.S. Department of Commerce, Bureau of Economic Analysis.

# Domestic Private Foundations and Related Excise Taxes, Tax Year 2009

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depreciation in the fair market value of assets, it provides a more comprehensive measure of total investment performance than the net investment income yield. Overall, median rates of total return realized by nonoperating foundations increased sharply between Tax Years 2008 and 2009, from -15.7 percent to 11.1 percent. In comparison, the market rate of return, as measured by Standard and Poor's (S&P) 500 index, fell 38.5 percent in 2008 and rose 23.5 percent in 2009.<sup>9</sup>

For Tax Year 2009, the median real rate of total return for nonoperating foundations in each asset-size class was positive. The median rates of total return generally increased with the size of the foundation, with the smallest foundations reporting the lowest median rate of total return, at 8.5 percent, and the largest foundations reporting the highest median rate of total return, at 14.1 percent.

Most private foundations are required to pay an excise tax on net investment income under IRC section 4940.<sup>10</sup> This excise tax is intended to cover expenses incurred by the IRS in the oversight of private foundation activities and the enforcement of laws governing private foundations' exempt status. Generally, the excise tax rate for domestic private foundations equals 2 percent of net investment income. The continued decline in

private foundation net investment income resulted in a decrease in the total amount of IRC section 4940 excise taxes between Tax Years 2008 and 2009, as shown in Figure G. For Tax Year 2008, in real terms, \$22.9 billion of the \$23.4 billion in net investment income reported by all domestic foundations was subject to the excise tax, which totaled \$293 million. Of the \$17.6 billion in net investment income reported by all domestic foundations for Tax Year 2009, \$17.3 billion was subject to the excise tax, which totaled just \$221 million.

Under IRC section 4940(e), domestic private foundations can qualify for a reduced net investment income tax rate of 1 percent if they can show growth in the rate of their charitable distributions. If total Tax Year 2009 qualifying distributions were larger than the total of averaged qualifying distributions made between 2004 and 2008 plus 1 percent of Tax Year 2009 net investment income, a foundation was eligible for the reduced tax rate for Tax Year 2009. Similar to the previous year, over 52 percent of the foundations reporting excise taxes on net investment income qualified for the reduced 1-percent tax rate for Tax Year 2009. Generally, larger foundations were more likely to qualify for the reduced tax rate than smaller foundations; for example, for Tax Year

## Figure G

### Domestic Private Foundations Reporting IRC Section 4940 Excise Tax on Investment Income, by Size of End-of-Year Fair Market Value of Total Assets, in Constant Dollars, Tax Years 2008–2009

[Money amounts are in millions of dollars]

Tax year, asset size [1]	Number of returns	Percentage of all foundations	Net investment income	Qualifying distributions	Section 4940 tax on net investment income	Percentage of foundations reporting:	
						1-Percent tax	2-Percent tax
	(1)	(2)	(3)	(4)	(5)	(6)	(7)
<b>Tax Year 2008, all foundations [2]</b>	<b>69,313</b>	<b>76.3</b>	<b>22,906</b>	<b>45,633</b>	<b>293</b>	<b>52.9</b>	<b>47.1</b>
Less than \$1,000,000	43,229	69.3	750	2,605	11	49.6	50.4
\$1,000,000 less than \$10,000,000	20,823	91.4	3,486	7,505	50	57.3	42.7
\$10,000,000 less than \$50,000,000	4,023	92.5	4,296	8,598	59	62.0	38.0
\$50,000,000 less than \$100,000,000	659	92.8	2,116	4,796	27	65.9	34.1
\$100,000,000 or more	579	92.9	12,258	22,128	146	64.1	35.9
<b>Tax Year 2009, all foundations [2]</b>	<b>66,743</b>	<b>72.1</b>	<b>17,254</b>	<b>41,684</b>	<b>221</b>	<b>52.7</b>	<b>47.3</b>
Less than \$1,000,000	38,682	62.5	555	1,931	8	50.2	49.8
\$1,000,000 less than \$10,000,000	22,348	91.1	2,443	6,456	35	54.9	45.1
\$10,000,000 less than \$50,000,000	4,374	91.6	3,219	7,493	45	60.1	39.9
\$50,000,000 less than \$100,000,000	686	92.7	1,631	3,958	22	61.1	38.9
\$100,000,000 or more	653	92.6	9,406	21,847	112	67.5	32.5

[1] Foundations were assigned to asset-size classes based on the reported constant dollar end-of-year fair market value of total assets for each tax year.

[2] Domestic private foundations reporting IRC Section 4940 excise tax on investment income.

NOTE: Money amounts are in 2009 "constant dollars" and have been adjusted for inflation based on the 2005 chain-type price index for Gross Domestic Product, as published by the U.S. Department of Commerce, Bureau of Economic Analysis. Detail may not add to totals because of rounding.

<sup>9</sup> Historical prices for the S&P 500 Index were obtained from the Google Finance Web site at <http://www.google.com/finance>.

<sup>10</sup> Some foundations were not required to pay the IRC section 4940 excise tax on net investment income. Certain foundations in IRC section 507(b)(1)(B) termination status, as well as certain exempt operating foundations described in IRC section 4940(d)(2), were exempt from paying the excise tax.

# Domestic Private Foundations and Related Excise Taxes, Tax Year 2009

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2009, more than 60 percent of foundations with assets of \$10 million or more were eligible for the reduced rate, compared to roughly half of foundations with less than \$1 million in assets. Despite the lower average tax rates, foundations with assets of \$10 million or more accounted for 81 percent of total tax liability for Tax Year 2009.

## The Charitable Distribution Requirement and the IRC Section 4942 Tax on Undistributed Income

The overall value of assets held by a private foundation, particularly those held for investment purposes, can play a major role in the foundation's ability to make distributions for charitable purposes. For nonoperating foundations, the annual charitable distribution requirement, known as the "distributable amount," is calculated based on an annual valuation of assets. As a result, fluctuations in asset values can directly affect the grantmaking practices of nonoperating foundations. IRC section 4942 outlines the annual distribution requirement and the excise tax penalty assessed on nonoperating foundations that fail to meet it. The distributable amount is derived from a foundation's minimum investment return, which equals 5 percent of the net value of noncharitable-use assets, calculated as the value of noncharitable-use assets, less both

the indebtedness incurred to acquire these assets and the amount of cash held for charitable activities. The distributable amount is the minimum investment return minus the excise tax on net investment income, plus or minus other adjustments (see Net Adjustments to Distributable Amount and Net Value of Noncharitable-use Assets in the Explanation of Terms section of this article for additional details).

The current year's distribution requirement may be satisfied by qualifying distributions from the current year as well as excess distributions carryovers from the previous 5 tax years. Qualifying distributions are those made for charitable purposes. Although qualifying distributions consist primarily of contributions, gifts, and grants disbursed throughout the year, they may also include operating and administrative expenses related to conducting charitable operations; program-related investments, such as loans to other 501(c)(3) organizations; amounts paid to acquire buildings, equipment, supplies, or other assets for charitable-use; and "set-asides," which are amounts earmarked for future charitable distributions.

Qualifying distributions and their components, along with distributable amounts, are shown for nonoperating foundations by asset-size class in Figure H. Nonoperating foundations paid \$43.3 billion in total

**Figure H**

### Domestic Nonoperating Private Foundations: Qualifying Distributions and Distributable Amount, by Size of End-of-Year Fair Market Value of Total Assets, Tax Year 2009

[Money amounts are in millions of dollars]

Asset size [1]	Qualifying distributions						Distributable amount
	Total	Contributions, gifts, and grants paid	Operating expenses	Program-related investments	Amounts paid to acquire assets	Set-asides	
(1)	(2)	(3)	(4)	(5)	(6)	(7)	
<b>All nonoperating foundations</b>	<b>43,280</b>	<b>38,422</b>	<b>3,730</b>	<b>534</b>	<b>499</b>	<b>94</b>	<b>23,434</b>
Less than \$1,000,000	3,733	3,464	249	16	1	2	666
\$1,000,000 less than \$10,000,000	6,479	5,962	411	74	21	10	3,214
\$10,000,000 less than \$50,000,000	7,635	6,892	638	70	30	5	4,039
\$50,000,000 less than \$100,000,000	3,734	3,270	389	33	26	15	2,078
\$100,000,000 or more	21,699	18,833	2,043	341	421	62	13,437
Percentage of total qualifying distributions							
<b>All nonoperating foundations</b>	<b>100.0</b>	<b>88.8</b>	<b>8.6</b>	<b>1.2</b>	<b>1.2</b>	<b>0.2</b>	<b>N/A</b>
Less than \$1,000,000	100.0	92.8	6.7	0.4	[2]	0.1	N/A
\$1,000,000 less than \$10,000,000	100.0	92.0	6.4	1.1	0.3	0.2	N/A
\$10,000,000 less than \$50,000,000	100.0	90.3	8.3	0.9	0.4	0.1	N/A
\$50,000,000 less than \$100,000,000	100.0	87.6	10.4	0.9	0.7	0.4	N/A
\$100,000,000 or more	100.0	86.8	9.4	1.6	1.9	0.3	N/A

N/A—Not applicable.

[1] Foundations were assigned to asset-size classes based on the reported current dollar end-of-year fair market value of total assets.

[2] Less than 0.05 percent.

NOTE: Detail may not add to totals because of rounding.

## Domestic Private Foundations and Related Excise Taxes, Tax Year 2009

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qualifying distributions for Tax Year 2009, of which 88.8 percent were in the form of contributions, gifts, and grants paid. Another 8.6 percent of qualifying distributions consisted of operating and administrative expenses. Program-related investments, amounts paid to acquire assets, and set-asides accounted for the remaining 2.6 percent of qualifying distributions. As asset size increased, contributions, gifts, and grants paid made up a smaller share of qualifying distributions.

Foundations' qualifying distributions exceeded the required distributable amount of \$23.4 billion to varying degrees across each asset-size category. Generally, as asset size increased, the extent to which foundations' qualifying distributions exceeded the required distributable amount decreased. In aggregate, the smallest foundations, those with less than \$1 million of total assets, reported total qualifying distributions that were more than five times larger than their required distributable amount. As a group, foundations with assets between \$1 million and \$10 million disbursed twice their required distributable amount in qualifying distributions, while those with assets of \$10 million or more disbursed slightly less than twice their required distributable amount.

The payout rate captures the relationship between an organization's qualifying distributions and its investment assets. Current-year distributions, combined with carryovers, are adjusted to include certain taxes and deductions and divided by the total value of noncharitable-use assets to arrive at a foundation's payout rate. This rate provides a measure of a foundation's success in meeting the annual required distributable amount. The distribution of payout rates for domestic nonoperating foundations, by selected percentiles, is illustrated in Figure I.

The percentile distribution of payout rates followed the same general trend in each of Tax Years 2008 and 2009. Payout rates for the vast majority of foundations ranged between 2.5 percent and 7.5 percent. For foundations with \$1 million or more of total assets, rates were generally uniform, with differences of roughly 1 percent among the various asset-size classes. However, for the smallest foundations, those with less than \$1 million of total assets, the range of payout rates was more significant—between 0.03 percent for the fifth percentile and 28.9 percent for the seventy-fifth percentile.

Some 20 percent of all foundations had payout rates at or below the 5-percent requirement. Within this group, payout rates for the smallest foundations were smaller and increased more dramatically compared to the rates of larger foundations. Above the 5-percent payout requirement, rates for the smallest foundations were larger and

again climbed more sharply relative to larger foundations' payout rates.

Median payout rates held fairly constant between Tax Years 2008 and 2009; the median payout rate for all foundations in each of these years was 6.2 percent. While the median payout rate for foundations with \$1 million or more of total assets was between 5.7 and 5.9 percent for Tax Year 2009, the smallest foundations had a median payout rate of 6.8 percent.

Foundations must meet the distributable amount requirement for the current tax year by the end of the next tax year or pay excise tax on the undistributed amount. For example, a foundation must have disbursed the required amount for Tax Year 2008 before the end of Tax Year 2009 in order to avoid paying the excise tax under IRC section 4942. As foundations do not calculate their required distributable amounts until the end of the tax year, they may choose to take advantage of the 1-year, tax-free "grace period" for making these distributions and report all or part of their current-year required distributions as undistributed income. The majority of foundations with a minimum distribution requirement for Tax Year 2009 met or exceeded their distribution requirement by the end of the tax year. Some 34.0 percent reported undistributed income for the year; these foundations had until the end of Tax Year 2010 before these amounts became taxable.

Private foundations report taxable amounts of undistributed income and compute related excise tax liability on Form 4720. This is by far the largest excise tax amount reported by private foundations on Form 4720. The number of foundations that filed Form 4720 for Tax Year 2009 for failing to distribute the minimum required amount decreased by 4.9 percent compared to Tax Year 2008. Figure J shows undistributed income subject to the IRC section 4942 excise tax ("taxable undistributed income"), as well as the amount of excise tax for Tax Year 2009, by asset size. In all, 1,285 private foundations reported a total of \$20.8 million of taxable undistributed income for Tax Year 2009. Over two-thirds, or \$14.1 million, of this total was undistributed income from Tax Year 2008, while the remaining \$6.7 million was undistributed income from years prior to Tax Year 2008. While smaller foundations were more likely to have some amount of taxable undistributed income, the average amount increased for larger foundations. For example, the average amount of taxable undistributed income was \$16,212 for all private foundations, while the average was \$6,722 for private foundations with less than \$1 million of total assets and \$165,467 for private foundations with \$10 million or more of total assets.

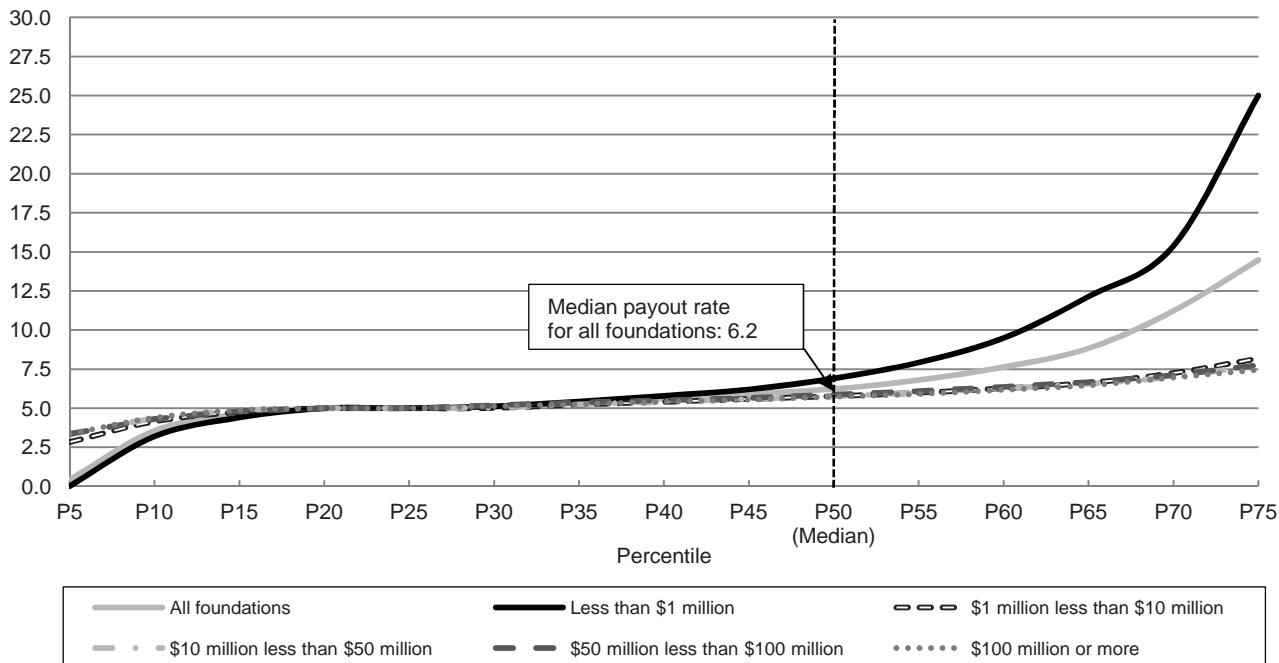
# Domestic Private Foundations and Related Excise Taxes, Tax Year 2009

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## Figure I

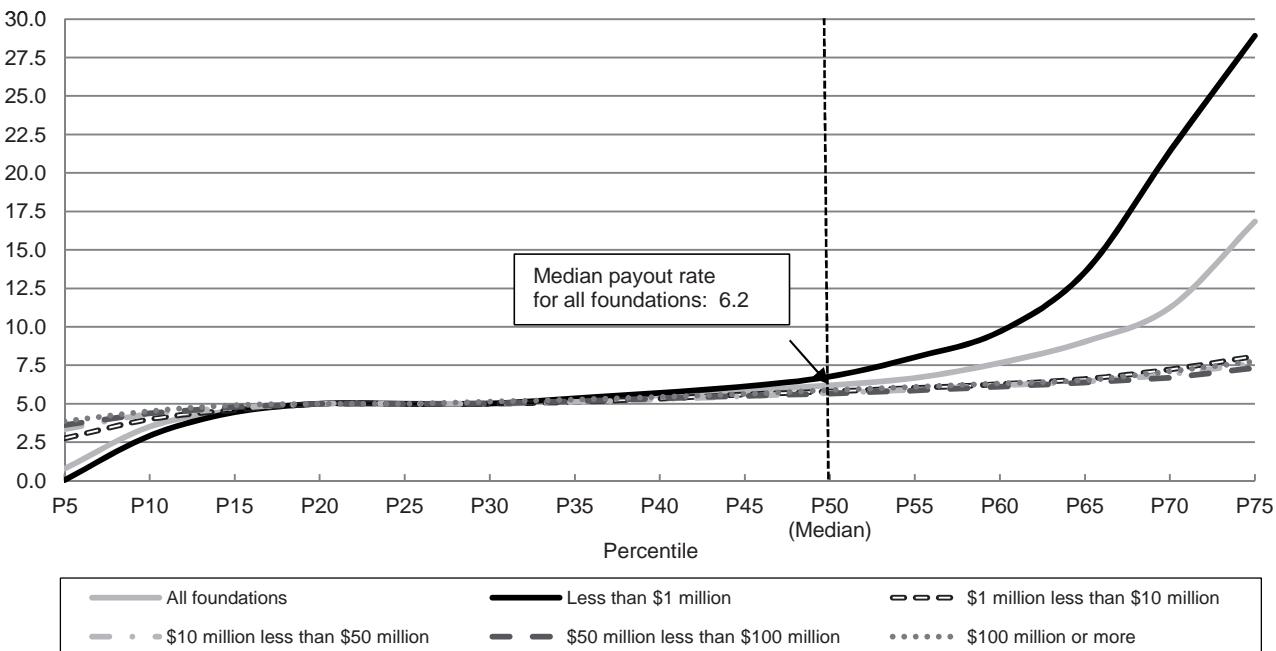
### Domestic Nonoperating Private Foundations: Selected Percentile Distribution of Payout Rates, by Size of End-of-Year Fair Market Value of Total Assets, Tax Year 2008

Payout rate  
(percentage)



### Domestic Nonoperating Private Foundations: Selected Percentile Distribution of Payout Rates, by Size of End-of-Year Fair Market Value of Total Assets, Tax Year 2009

Payout rate  
(percentage)



# Domestic Private Foundations and Related Excise Taxes, Tax Year 2009

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## Figure J

### IRC Section 4942 Undistributed Income Tax Reported by Domestic Private Foundations on Form 4720, by Size of End-of-Year Fair Market Value of Total Assets, Tax Year 2009

[Money amounts are in thousands of dollars]

Asset size [1]	Undistributed income subject to tax [2]						Total tax	
	Total		Tax years prior to 2008		Tax Year 2008			
	Number of returns	Amount	Number of returns	Amount	Number of returns	Amount		
(1)	(2)	(3)	(4)	(5)	(6)	(7)		
All foundations	1,285	20,833	409	6,715	1,141	14,118	6,250	
Less than \$1,000,000	978	6,574	351	2,452	850	4,122	1,973	
\$1,000,000 less than \$10,000,000	277	9,295	55	2,585	262	6,710	2,788	
\$10,000,000 less than \$50,000,000	** 30	** 4,964	** 3	** 1,678	** 29	** 3,285	** 1,489	
\$50,000,000 less than \$100,000,000	**	**	**	**	**	**	**	
\$100,000,000 or more	**	**	**	**	**	**	**	

\*\* Data combined to prevent disclosure of specific taxpayer data.

[1] Foundations were assigned to asset-size classes based on the reported current dollar end-of-year fair market value of total assets.

[2] Data are compiled from Schedule B of Forms 4720 filed during Calendar Years 2010 and 2011 by domestic private foundations only.

Generally, undistributed income was taxed at a rate of 30 percent.<sup>11</sup> In some cases, including allowances for 5-year “start-up” periods for new foundations and certain types of organizational transitions or terminations, Tax Year 2008 undistributed income was not subject to the IRC section 4942 excise tax. The \$6.3 million of taxes on undistributed income represented 62.7 percent of all private foundation excise taxes reported on Form 4720 for Tax Year 2009. The average amount of tax on undistributed income reported by foundations was \$4,864; this average ranged from roughly \$2,000 for the smallest foundations to close to \$50,000 for the largest foundations.

## Self-Dealing Taxes Under IRC Section 4941

For Tax Year 2009, there were 107 Forms 4720 filed by private foundations reporting a total of 294 acts of self-dealing. In total, these acts involved \$14.9 million, up from the \$10.6 million reported for Tax Year 2008. The average amount of each self-dealing act was \$51,000. The amount of self-dealing tax is calculated as a percentage of the amount involved in the self-dealing act. For each act, an initial 10-percent tax per year is imposed on the self-dealer, while an initial 5-percent tax per year is imposed on the foundation manager.<sup>12</sup> For Tax Year 2009, self-dealing taxes totaled \$1.7 million and represented the second largest excise tax amount reported by private foundations on Form 4720.

Acts of self-dealing are classified into five categories on Form 4720, as shown in Figure K. For Tax Year 2009, the most commonly reported act of self-dealing was borrowing money from, lending money to, or otherwise extending credit to disqualified persons. These activities accounted for 34.4 percent of self-dealing acts and 18.5 percent of the total self-dealing tax amount. The second most frequently reported act of self-dealing, paying compensation to or reimbursing a disqualified person, accounted for 25.2 percent of self-dealing acts and 59.0 percent of the total self-dealing tax amount. The remaining three categories—transferring income or assets to a disqualified person; selling, exchanging, or leasing property with a disqualified person; and furnishing goods, services, or facilities to a disqualified person—together accounted for 40.5 percent of all acts of self-dealing and 22.5 percent of the total self-dealing tax amount.

## Additional Excise Taxes Under IRC Sections 4943–4945

Under IRC section 4943, private foundations whose holdings in an unrelated corporation exceed allowed amounts are subject to taxes on excess business holdings. Generally, foundations are limited to holding 20 percent of the voting stock of a corporation, reduced by the percentage owned by disqualified persons. Private foundations are subject to an initial 10-percent tax on

<sup>11</sup> The excise tax on undistributed income is a “two-tier” tax, which consists of an initial tax and additional tax. If a private foundation has undistributed income for a reporting year that remains undistributed at the end of the following tax year, the initial tax of 30 percent automatically is imposed. Any organization that fails to distribute the undistributed income within a designated “correction period” may be subject to the additional tax, which equals 100 percent of the amount of the undistributed income.

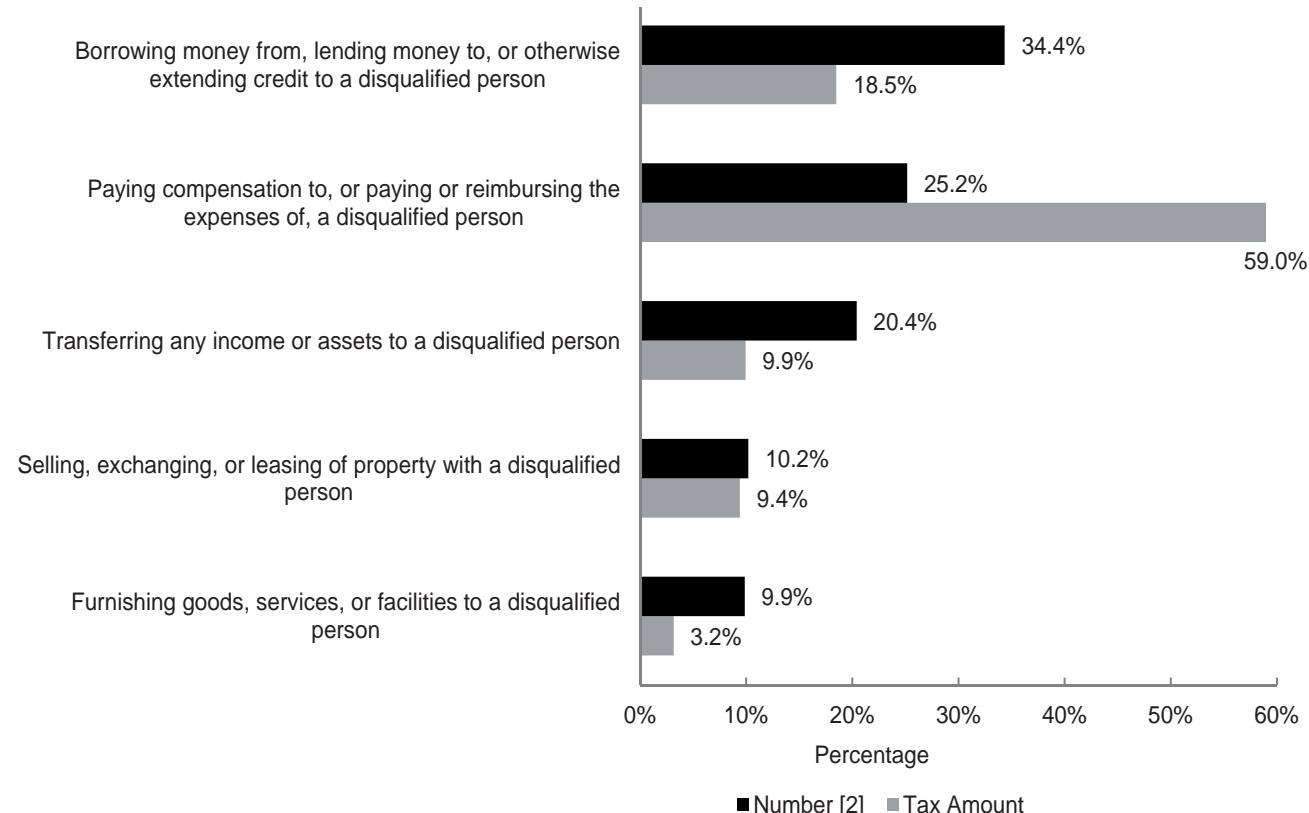
<sup>12</sup> The total self-dealing tax imposed on foundation managers for all years in the taxable period is limited to \$20,000.

# Domestic Private Foundations and Related Excise Taxes, Tax Year 2009

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## Figure K

### IRC Section 4941 Excise Taxes on Self-Dealing Reported by Domestic Private Foundations: Self-Dealing Acts as a Percentage of Total, by Type, Tax Year 2009 [1]



[1] Data are compiled from Schedule A of Forms 4720 filed during Calendar Years 2010 and 2011 by domestic private foundations only. Includes initial tax, as well as tax on foundation managers, office directors, trustees, and other individuals.

[2] Percentages are based on the total number of reported acts of self-dealing, rather than the frequency of returns. A single return might have included one or more acts of self-dealing.

excess business holdings. If a foundation fails to dispose of these holdings within a specified correction period, it may be subject to a second-tier tax of 200 percent on the excess business holdings. This second-tier tax is not reported on Form 4720. For Tax Year 2009, there were only five private foundations that reported a total of nine taxable excess business holdings on Form 4720 (Figure L). These excess business holdings totaled \$13.7 million for an average of \$1.5 million per holding. For Tax Year 2009, taxes on excess business holdings totaled \$1.4 million and represented the third largest excise tax amount reported by private foundations on Form 4720.

IRC section 4944 imposes taxes on any organization that invests in a manner that endangers the organization's ability to carry out its tax-exempt purposes.

A jeopardizing investment is one that shows a lack of reasonable business care and prudence in providing for the foundation's short- and long-term financial needs. Foundations that hold large percentages of their portfolios in such investments, which may include high-risk, low-yield investments; securities purchased on the margin; commodity futures; working interest in oil and gas wells; "puts," "calls," and "straddles"; warrants; and short sales, may be subject to the tax. High-risk, low-return "program-related" investments, which are investments made in support of a foundation's charitable purpose, are excluded from IRC section 4944 tax. For example, a foundation that, as one of its charitable activities, provided loans to a small business in an economically disadvantaged area would not be subject to the tax on the loan transactions. There were no private foundations that

# Domestic Private Foundations and Related Excise Taxes, Tax Year 2009

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**Figure L**

## IRC Section 4943 Excise Taxes on Excess Business Holdings Reported by Domestic Private Foundations on Form 4720, Tax Year 2009

[Money amounts are in whole dollars]

Item	Number or amount	Percentage of all 4720 filers
Number of returns with taxable acts	5	0.3
Number of taxable acts	9	0.5
Amount involved in act	13,713,712	26.0
Mean amount involved in act	1,523,746	N/A
Median amount involved in act	205,865	N/A
Total reported tax	1,371,372	13.8
Mean tax amount per taxable act	152,375	N/A
Median tax amount per taxable act	20,587	N/A

N/A—Not applicable.

NOTE: Data are compiled from Schedules C of Forms 4720 filed by domestic private foundations during Calendar Years 2010 and 2011. Includes initial tax on foundation only.

reported IRC section 4944 excise taxes on jeopardizing investments on Form 4720 for Tax Year 2009.

Under IRC section 4945, certain types of expenditures are designated as taxable. These include attempting to influence legislation or the outcome of a specific election; providing a grant to an individual for travel, study, or other similar purpose; or providing support for any other than religious, charitable, scientific, literary, or educational purposes. A foundation that provides a grant to an organization other than a recognized charitable organization may also incur taxable expenditures, but may avoid tax liability by exercising “expenditure responsibility” with respect to the grant. Expenditure responsibility requires the foundation to set up procedures to ensure that the grant is spent solely for the purpose for which it was made, provide reports from the grantee on how the grant was spent, and fully disclose the expenditures to the IRS. For Tax Year 2009, there were 98 private foundations that reported a total of 153 taxable expenditures on Form 4720 (Figure M). These taxable expenditures totaled \$3.2 million for Tax Year 2009, with the mean amount at just less than \$21,000 and the median amount at \$1,500. For Tax Year 2009, the total tax on taxable expenditures reported by private foundations on Form 4720 was a little more than \$640,000.

## Summary

Private foundations exempt under IRC section 501(c)(3) filed 92,624 Forms 990-PF for Tax Year 2009, a 2.0-percent increase over the previous year. Total assets reported by private foundations increased 10.5 percent between Tax Years 2008 and 2009, from \$532.9 billion to \$588.5

**Figure M**

## IRC Section 4945 Excise Taxes on Taxable Expenditures Reported by Domestic Private Foundations on Form 4720, Tax Year 2009

[Money amounts are in whole dollars]

Item	Number or amount	Percentage of all 4720 filers
Number of returns with taxable acts	98	6.6
Number of taxable acts	153	8.8
Amount involved in act	3,183,424	6.0
Mean amount involved in act	20,807	N/A
Median amount involved in act	1,500	N/A
Total reported tax	[1] 640,263	6.4
Mean tax amount per taxable act	4,185	N/A
Median tax amount per taxable act	375	N/A

N/A—Not applicable.

[1] This total amount differs from the rounded, detail amounts shown in Figure D.

NOTE: Data are compiled from Schedules E of Forms 4720 filed by domestic private foundations during Calendar Years 2010 and 2011. Includes initial tax, as well as tax on foundation managers, office directors, trustees, and other individuals.

billion. Over the same time period, total revenue increased by a smaller margin, 3.8 percent, from \$50.3 billion to \$52.2 billion. The amount of contributions, gifts, and grants paid declined 5.6 percent between Tax Years 2008 and 2009. Nonoperating private foundations, which primarily distributed grants in support of their charitable purposes, represented the majority of filers.

Large foundations, those with assets of \$50 million or more, represented 1.6 percent of filers, but held more than two-thirds of the fair market value of total assets reported by private foundations for Tax Year 2009. Additionally, large foundations received the majority of total revenue and distributed the majority of reported contributions, gifts, and grants.

Although exempt from traditional income taxes, private foundations were required to report and pay excise taxes under IRC sections 4940 through 4945. Domestic private foundations reported \$230.9 million in excise tax liability for Tax Year 2009. The IRC section 4940 excise tax on net investment income, \$221.0 million, was the largest component of excise taxes. This tax was reported on Form 990-PF and was required for most private foundations that held investment assets. An additional \$10.0 million in excise taxes, under IRC sections 4941-4945, were reported on Forms 4720 by private foundations and disqualified persons that engaged in prohibited activities for Tax Year 2009. The IRC section 4942 tax on undistributed income, paid by nonoperating private foundations that failed to meet their charitable distribution requirement for a previous tax year, was the largest private foundation excise tax reported on Forms 4720. This excise tax totaled \$6.3 million in Tax Year 2009. Taxes on

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self-dealing, imposed on individuals under IRC section 4941, totaled \$1.7 million and was the second-largest tax reported on Forms 4720 for private foundations. The remaining taxes reported by private foundations on Forms 4720, described in IRC sections 4943-4945, totaled \$2.0 million for Tax Year 2009.

## Data Sources and Limitations

The Tax Year 2009 private foundation statistics presented in this article are based on a sample of Tax Year 2009 Forms 990-PF that were filed with the Internal Revenue Service. Organizations having accounting periods beginning in 2009 (and therefore ending between December 2009 and November 2010) that filed returns that posted to the IRS Business Master File in Calendar Years 2010 and 2011 were included in the sample. Some part-year returns were included in the samples for organizations that changed their accounting periods, or filed initial or final returns. Over 72 percent of the domestic private foundations in the sample had accounting periods covering Calendar Year 2009 or, in some cases, part-year periods that ended in December 2009.

The Tax Year 2009 sample was stratified based on both the size of fair market value of total assets and the type of organization (either a private foundation or an IRC section 4947(a)(1) charitable trust). To accomplish this, 100 percent of returns filed for foundations with fair market asset value of \$10 million or more for Tax Year 2009, or 6.5 percent of all foundations, were included in the samples, since these organizations represented the vast majority of financial activity. Additionally, Forms 990-PF filed by foundations that also filed a Form 4720 for Tax Year 2009 during the 2-year sampling period were selected at a rate of 100 percent. The remaining foundation population was randomly selected for the sample at various rates of less than 100 percent depending on asset size. The realized sampling rates for each asset-size category are included in Figure N. Figure O shows the magnitude of sampling error for selected items for Tax Year 2009, measured by coefficients of variation.

Efforts were made to verify that organizations selected into the sample were properly classified as foundations or trusts. The relatively few foundations in the sample that were incorrectly selected as trusts were ultimately treated as foundations for these statistics, and the relatively few trusts incorrectly sampled as foundations were also reclassified. However, the weights used for these organizations were based on the original sample selection classification.

For Tax Year 2009, there were 10,652 foundation returns in the sample selected from a population of 96,563.

The difference between the actual population of Forms 990-PF records that posted to the IRS Business Master File during 2010 and 2011 and the estimated population of domestic foundation returns as published in this article results from sample code changes and the effects of returns that were “rejected” from the sample as part of the editing process. For example, foreign returns and duplicate filings by a single organization were included in the actual population of Forms 990-PF filed but were rejected from the SOI sample.

## Figure N

**Realized Sampling Rates for Private Foundation Returns, by Size of End-of-Year Fair Market Value of Total Assets, Tax Year 2009**

Asset size	Realized sampling rate (percentage)
Less than \$125,000	1.0
\$125,000 under \$400,000	1.9
\$400,000 under \$1,000,000	2.2
\$1,000,000 under \$2,500,000	6.5
\$2,500,000 under \$10,000,000	10.0
\$10,000,000 or more	100.0

The IRC sections 4941-4945 excise tax statistics included in this article were obtained from the combined population of Forms 4720 filed by private foundations for Tax Year 2009 and processed during Calendar Years 2010 and 2011. Of the 3,838 Forms 4720 received from private foundations, charitable trusts, or disqualified persons over the 2 calendar years, some 1,770 were filed for Tax Year 2009. Returns filed by charitable trusts were excluded from the analysis; data from the 1,498 private foundations and associated disqualified persons are included in these statistics. Due to IRS processing procedures, in a small number of cases, a return filed by an individual whose accounting period differed from that of his or her associated private foundation might have been excluded from the population of filers.

The data presented were obtained from returns as originally filed with IRS. In most cases, changes made to the original return because of administrative processing, audit procedures, or a taxpayer amendment were not captured in the statistics. The data were subject to comprehensive testing and correction procedures in order to ensure statistical reliability and validity. A general discussion of the reliability of estimates based on samples, methods for evaluating both the magnitude of sampling and nonsampling error, and the precision of sample

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## Figure 0

### Coefficients of Variation for Domestic Private Foundations, Selected Items, by Size of End-of-Year Fair Market Value of Total Assets, Tax Year 2009

Item	Total	Asset size				
		Assets zero or unreported	\$1 under \$100,000	\$100,000 under \$1,000,000	\$1,000,000 under \$10,000,000	\$10,000,000 or more
	(1)	(2)	(3)	(4)	(5)	(6)
Number of returns	0.00	27.82	2.55	1.62	0.83	N/A
Total revenue	2.18	64.35	35.18	31.85	7.99	N/A
Contributions, gifts, and grants received	2.60	62.42	36.00	33.65	8.34	N/A
Dividends and interest from securities	0.38	79.11	13.37	3.45	2.13	N/A
Net gain (less loss) from sales of assets	3.36	70.26	62.44	25.52	9.95	N/A
Total expenses	1.96	43.94	30.70	24.60	5.03	N/A
Disbursements for charitable purposes	2.21	44.91	34.27	27.44	4.87	N/A
Contributions, gifts, and grants paid	1.70	47.14	38.69	16.73	4.84	N/A
Excess of revenue over expenses	11.46	49.76	47.16	20.43	25.26	N/A
Net investment income	0.79	70.49	39.84	10.89	5.09	N/A
Excise tax on net investment income	0.82	70.18	34.17	9.86	4.77	N/A
Total assets (book value)	0.16	*	12.28	1.73	1.07	N/A
Investment assets, total	0.17	*	15.30	2.13	1.20	N/A
Investments in securities, total	0.29	*	21.63	3.47	1.72	N/A
Government obligations	0.63	*	43.94	12.50	6.37	N/A
Corporate stock	0.34	*	24.86	4.16	1.96	N/A
Corporate bonds	0.71	*	31.63	8.39	3.90	N/A
Total assets (fair market value)	0.18	*	6.79	1.26	1.32	N/A
Investment assets, total	0.20	*	8.58	1.74	1.49	N/A
Investments in securities, total	0.34	*	13.20	3.06	2.14	N/A
Government obligations	0.64	*	44.70	12.47	6.35	N/A
Corporate stock	0.42	*	14.50	3.64	2.54	N/A
Corporate bonds	0.70	*	32.06	8.41	3.81	N/A
Net worth (book value)	0.17	89.23	35.65	1.81	1.10	N/A
Noncharitable-use assets	0.21	64.09	8.94	1.65	1.48	N/A
Minimum investment return	0.22	64.09	8.96	1.68	1.49	N/A
Distributable amount	0.23	64.77	10.15	1.95	1.61	N/A
Qualifying distributions	2.13	44.91	34.16	27.30	4.86	N/A
Undistributed income for current year	0.85	9.33	22.78	6.71	4.80	N/A
Excess distributions carryover to next year	3.48	60.96	30.77	12.46	10.18	N/A

\* No money amount reported.

N/A—Not applicable because the realized sampling rate was 100 percent. See Figure N.

estimates can be found in SOI Sampling Methodology and Data Limitations later in this issue of the *SOI Bulletin*, or at <http://www.irs.gov/pub/irs-soi/sampling.pdf>.

### Explanation of Selected Terms

The following explanations describe terms as they applied to private foundations:

**Disbursements for charitable purposes**—These disbursements are outlays made exclusively in support of a foundation's tax-exempt purpose and include grants paid and operating and administrative expenses. They were the largest component of "qualifying distributions" for

Tax Year 2009. The total of disbursements for charitable purposes was reported on Form 990-PF, Part I, line 26, column (d).

**Disqualified person**—In general, a disqualified person is a substantial contributor; a foundation manager; a person who owns more than 20 percent of a corporation, partnership, trust, or unincorporated enterprise that is itself a substantial contributor; or a family member of a disqualified person.

**Distributable (payout) amount**—This is the minimum payout amount that is required to be distributed by nonoperating foundations by the end of the tax year that

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follows the tax year for which the return was filed. For example, foundations were required to distribute their Tax Year 2008 amounts before the end of Tax Year 2009. Failure to distribute income within this period results in a 30-percent excise tax on the undistributed portion. The distributable amount equals 5 percent of the net value of noncharitable-use assets, called the “minimum investment return,” minus the excise tax on net investment income, plus or minus other adjustments, either allowed or required (see “Net adjustments to distributable amount” in this section).

*Minimum investment return*—The minimum investment return is used as the base for calculating the “distributable amount.” This is the aggregate fair market value of assets not used for charitable purposes, less both the indebtedness incurred to acquire these assets and the cash held for charitable activities, multiplied by 5 percent. Minimum investment return was reported on Form 990-PF, Part X, line 6.

*Net adjustments to distributable amount*—The “distributable amount” is increased by recoveries of amounts previously treated as qualifying distributions. Additionally, certain organizations with governing instruments that require the accumulation of income are instructed to deduct the accumulated income from their distributable amount. These adjustments are allowed only for foundations organized before May 27, 1969, whose governing instrument requires such accumulation because State Courts would not allow the organization to change the governing instrument. Recoveries on amounts treated as qualifying distributions and the deduction for accumulated income were reported on Form 990-PF, Part XI, lines 4 and 6, respectively.

*Net investment income*—This equals gross investment income less allowable deductions. Interest, dividends, rents, royalties, net income from realized capital gains, and, beginning in 2006, certain other similar income from investments are included in net investment income. Any investment income derived from unrelated trade or business activities, and therefore subject to the “unrelated business income” tax and reported on Form 990-T, *Exempt Organization Business Income Tax Return*, is excluded. Net investment income was reported on Form 990-PF, Part I, line 27b, column (b).

*Net value of noncharitable-use assets*—An asset is considered a noncharitable-use asset if it is not used in carrying out a charitable, educational, or other similar function that relates directly to the tax-exempt status of the foundation. Examples include the fair market values of securities and rental property owned by the foundation for investment purposes. For purposes of calculating the “minimum investment return,” valuation

methods for noncharitable-use assets reported in this section differ from those used to report the end-of-year fair market values for all assets in Part II. The average, rather than end-of-year, fair market values of cash and securities that were not used or held for use for charitable purposes during the tax year is derived and used in this calculation. With certain exceptions, other assets included in this calculation are valued annually, but not necessarily based on the end-of-year value. The fair market values of noncharitable-use assets may reflect reductions due to certain characteristics associated with those assets, such as lack of marketability or blockage. The net value of noncharitable-use assets is reduced by acquisition indebtedness and cash deemed held for charitable purposes; the latter reduction is generally limited to 1.5 percent of noncharitable-use assets less acquisition indebtedness. Thus, the net value of noncharitable-use assets, which was reported on Form 990-PF, Part X, line 5, as an element of the “minimum investment return” calculation, differed from the balance sheet-derived fair market value of total assets, as reported on Part II, line 16, column (c), which equaled the total end-of-year value for all assets held by the foundation.

*Nonoperating foundations*—These are foundations that generally carried on their charitable activities in an indirect manner by making grants to other organizations directly engaged in charitable activities, in contrast to operating foundations that engaged in charitable activities themselves. However, for Tax Year 2009, some nonoperating foundations may have been actively involved in charitable programs of their own, in addition to making grants. For example, a foundation initially organized as operating that was unable to meet the operating foundation requirements for Tax Year 2009 could have continued its direct charitable activities. Such an organization could have directed expenditures made for these direct charitable activities, as well as expenditures made for the disbursement of contributions, gifts, and grants and other indirect charitable activities, toward meeting the required distribution requirement.

*Operating foundations*—These foundations generally expended their income for direct, active involvement in a tax-exempt activity. Operating foundations were exempted from the income distribution requirement and related excise taxes that were applicable to their nonoperating counterparts. Individual taxpayers could deduct contributions to operating foundations on their individual income tax returns; the deduction could not exceed 50 percent of a donor’s “adjusted gross income” (as opposed to 30 percent for contributions to nonoperating foundations).

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*Private foundation*—A private foundation is defined in IRC section 501(c)(3) as a nonprofit organization with a narrow source of funds that operated or supported educational, scientific, charitable, religious, and other programs dedicated to improving the general welfare of society. A private foundation was an organization that qualified for tax-exempt status under IRC section 501(c)(3) but was not (1) a church, school, hospital, or medical research organization; (2) an organization with broad public support in the form of contributions or income from tax-exempt activities; (3) an organization that was operated by, or in connection with, any of the above described organizations; or (4) an organization that conducted tests for public safety. The primary difference between a private foundation and other organizations exempt under 501(c)(3) was the source of the organization's funding. An individual, a family, or a corporation typically funded foundations, while most other tax-exempt organizations received funds from a large number of sources among the general public.

*Qualifying distributions*—Qualifying distributions include disbursements for charitable purposes (grants, direct expenditures to accomplish charitable purposes, and charitable-purpose operating and administrative expenses); amounts paid to acquire assets used directly to accomplish tax-exempt functions; charitable program-related investments; and amounts set aside for future charitable projects. Qualifying distributions may be credited against a foundation's obligation to pay out its "distributable amount." Total qualifying distributions were reported on Form 990-PF, Part XII, line 4.

*Set-asides*—Amounts set-aside for specific charitable purposes can be treated as qualifying distributions only if the foundation establishes to the satisfaction of the IRS that the amount will be paid for the specific project within 60 months from the date of the first set-aside and if the foundation meets either the suitability test or the cash distribution test. To meet the suitability test, a foundation must receive prior approval from the IRS and must demonstrate that the project can be better

accomplished by a set-aside than by an immediate payment of funds. To meet the cash distribution test under IRC section 4942(g)(2)(B)(ii), a foundation must attach a distribution schedule to its annual return for the year of the set-aside and for each subsequent year until the set-aside amount has been distributed. Set-asides were reported on Form 990-PF, Part XII, lines 3a and 3b.

*Total assets*—This is the sum of all assets reported in the foundation's balance sheet, shown at both book value and fair market value. Total assets were reported on Form 990-PF, Part II, line 16, columns (a) beginning-of-year book value, (b) end-of-year book value, and (c) end-of-year fair market value.

*Total revenue*—This is the sum of gross contributions, gifts, and grants received; interest on savings and temporary cash investments; dividends and interest from securities; net gain (or loss) from sales of assets (mostly investment assets, but also charitable-use assets); gross rents and royalties; gross profit (or loss) from business activities; and other income (such as royalty income, program-related investment income, interest earned on assets used for charitable purposes, and imputed interest on distributions deferred interest). Total revenue items, which included both investment and charitable-use items, were reported on Form 990-PF, Part I, line 12, column (a).

*Undistributed income*—This is the portion of the required "distributable amount" still undistributed after the sum of current-year qualifying distributions and any excess distributions carried over from prior years are subtracted. This item was reported on Form 990PF, Part XIII, line 6f, column (d). Under IRC section 4942, nonoperating private foundations that did not pay out an amount equal to the Tax Year 2008 "distributable amount" by the end of Tax Year 2009 were subject to an excise tax on the undistributed amount. As a result of legislation included in the Pension Protection Act of 2006, the initial tax on undistributed income was increased from 15 percent to 30 percent of the undistributed amount for taxable years beginning after August 17, 2006. The tax, which is automatically imposed, is reported on Form 4720.

# Domestic Private Foundations and Related Excise Taxes, Tax Year 2009

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**Table 1. Domestic Private Foundations: Number and Selected Financial Data, by Type of Foundation and Size of End-of-year Fair Market Value of Total Assets, Tax Year 2009**

[All figures are estimates based on a sample—money amounts are in thousands of dollars]

Type of foundation, asset size	Number of returns	Total revenue		Selected sources of revenue			
				Contributions, gifts, and grants received		Dividends and interest from securities	
		Number of returns	Amount	Number of returns	Amount	Number of returns	Amount
(1)	(2)	(3)	(4)	(5)	(6)	(7)	
<b>All foundations</b>							
<b>Total</b>	<b>92,624</b>	<b>89,575</b>	<b>52,179,124</b>	<b>37,310</b>	<b>42,380,197</b>	<b>66,218</b>	<b>9,029,813</b>
Zero or unreported	1,244	1,135	65,993	618	67,947	* 207	* 495
\$1 under \$100,000	25,562	22,851	1,449,584	13,508	1,408,387	9,391	10,604
\$100,000 under \$1,000,000	35,077	34,925	2,708,381	12,113	2,535,912	28,175	275,200
\$1,000,000 under \$10,000,000	24,520	24,448	6,840,794	8,517	5,849,505	22,599	1,536,171
\$10,000,000 under \$25,000,000	3,429	3,424	5,993,532	1,362	5,018,182	3,219	985,992
\$25,000,000 under \$50,000,000	1,347	1,347	4,187,036	525	3,563,740	1,258	832,271
\$50,000,000 under \$100,000,000	740	739	3,599,795	324	2,954,343	702	886,989
\$100,000,000 or more	705	705	27,334,010	342	20,982,179	667	4,502,092
<b>Nonoperating foundations</b>							
<b>Total</b>	<b>84,660</b>	<b>81,881</b>	<b>44,571,261</b>	<b>31,898</b>	<b>36,149,987</b>	<b>63,127</b>	<b>8,660,573</b>
Zero or unreported	1,038	1,032	62,394	* 516	* 64,340	* 207	* 495
\$1 under \$100,000	21,775	19,167	1,284,842	10,745	1,260,501	8,367	9,577
\$100,000 under \$1,000,000	33,110	33,004	1,611,366	11,005	1,558,415	27,536	267,395
\$1,000,000 under \$10,000,000	23,021	22,964	5,625,751	7,482	5,063,127	21,556	1,488,304
\$10,000,000 under \$25,000,000	3,158	3,156	4,093,377	1,150	3,309,234	3,024	944,221
\$25,000,000 under \$50,000,000	1,237	1,237	3,158,879	432	2,769,831	1,175	794,990
\$50,000,000 under \$100,000,000	682	681	2,864,872	279	2,309,608	651	838,825
\$100,000,000 or more	639	639	25,869,780	288	19,814,931	611	4,316,766
<b>Operating foundations</b>							
<b>Total</b>	<b>7,964</b>	<b>7,694</b>	<b>7,607,864</b>	<b>5,412</b>	<b>6,230,210</b>	<b>3,091</b>	<b>369,241</b>
Zero or unreported	* 206	* 103	* 3,598	* 102	* 3,607	* 0	* 0
\$1 under \$100,000	3,787	3,684	164,742	2,763	147,887	1,024	1,027
\$100,000 under \$1,000,000	1,967	1,921	1,097,015	1,107	977,497	638	7,805
\$1,000,000 under \$10,000,000	1,499	1,484	1,215,043	1,035	786,379	1,043	47,867
\$10,000,000 under \$25,000,000	271	268	1,900,156	212	1,708,948	195	41,771
\$25,000,000 under \$50,000,000	110	110	1,028,157	93	793,909	83	37,281
\$50,000,000 under \$100,000,000	58	58	734,923	45	644,735	51	48,163
\$100,000,000 or more	66	66	1,464,230	54	1,167,248	56	185,326
<b>Grantmaking foundations</b>							
<b>Total</b>	<b>77,316</b>	<b>76,312</b>	<b>45,617,832</b>	<b>29,024</b>	<b>36,754,171</b>	<b>61,546</b>	<b>8,853,960</b>
Zero or unreported	823	823	64,379	* 410	* 66,024	* 207	* 495
\$1 under \$100,000	16,642	15,718	1,156,386	8,950	1,167,380	7,583	9,407
\$100,000 under \$1,000,000	31,156	31,108	1,588,654	10,020	1,451,741	26,522	265,001
\$1,000,000 under \$10,000,000	22,838	22,807	5,512,295	7,357	4,837,705	21,639	1,494,484
\$10,000,000 under \$25,000,000	3,207	3,207	5,084,167	1,199	4,327,528	3,067	958,312
\$25,000,000 under \$50,000,000	1,262	1,262	3,663,981	466	3,206,661	1,202	810,558
\$50,000,000 under \$100,000,000	709	709	3,337,912	304	2,742,588	682	872,626
\$100,000,000 or more	677	677	25,210,058	317	18,954,545	644	4,443,077

Footnotes at end of table.

# Domestic Private Foundations and Related Excise Taxes, Tax Year 2009

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**Table 1. Domestic Private Foundations: Number and Selected Financial Data, by Type of Foundation and Size of End-of-year Fair Market Value of Total Assets, Tax Year 2009—Continued**

[All figures are estimates based on a sample—money amounts are in thousands of dollars]

Type of foundation, asset size	Number of returns	Total revenue		Selected sources of revenue			
				Contributions, gifts, and grants received		Dividends and interest from securities	
		Number of returns	Amount	Number of returns	Amount	Number of returns	Amount
(1)	(2)	(3)	(4)	(5)	(6)	(7)	
<b>Grantmaking-nonoperating foundations</b>							
<b>Total</b>	<b>73,299</b>	<b>72,310</b>	<b>40,910,577</b>	<b>26,579</b>	<b>32,807,562</b>	<b>59,526</b>	<b>8,591,199</b>
Zero or unreported	720	720	60,781	* 308	* 62,417	* 207	* 495
\$1 under \$100,000	14,698	13,773	1,052,466	7,722	1,065,319	6,866	8,576
\$100,000 under \$1,000,000	30,207	30,159	1,489,963	9,518	1,371,093	25,983	257,652
\$1,000,000 under \$10,000,000	22,074	22,058	4,798,186	6,951	4,359,451	21,079	1,469,068
\$10,000,000 under \$25,000,000	3,090	3,090	3,669,637	1,107	2,983,700	2,978	937,056
\$25,000,000 under \$50,000,000	1,206	1,206	2,795,840	418	2,484,876	1,160	789,825
\$50,000,000 under \$100,000,000	672	672	2,724,824	273	2,184,634	647	837,041
\$100,000,000 or more	632	632	24,318,881	282	18,296,073	606	4,291,487
<b>Grantmaking-operating foundations</b>							
<b>Total</b>	<b>4,017</b>	<b>4,002</b>	<b>4,707,254</b>	<b>2,446</b>	<b>3,946,610</b>	<b>2,020</b>	<b>262,760</b>
Zero or unreported	* 103	* 103	* 3,598	* 102	* 3,607	* 0	* 0
\$1 under \$100,000	1,945	1,945	103,920	1,229	102,061	* 717	* 832
\$100,000 under \$1,000,000	950	950	98,691	503	80,648	539	7,349
\$1,000,000 under \$10,000,000	764	749	714,109	406	478,254	560	25,415
\$10,000,000 under \$25,000,000	117	117	1,414,530	92	1,343,828	89	21,256
\$25,000,000 under \$50,000,000	56	56	868,141	48	721,785	42	20,733
\$50,000,000 under \$100,000,000	37	37	613,088	31	557,954	35	35,585
\$100,000,000 or more	45	45	891,177	35	658,472	38	151,590

Footnotes at end of table.

# Domestic Private Foundations and Related Excise Taxes, Tax Year 2009

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**Table 1. Domestic Private Foundations: Number and Selected Financial Data, by Type of Foundation and Size of End-of-year Fair Market Value of Total Assets, Tax Year 2009—Continued**

[All figures are estimates based on a sample—money amounts are in thousands of dollars]

Type of foundation, asset size	Selected sources of revenue—continued		Total expenses		Excess of revenue (less loss) over expenses		Net investment income	
	Net gain (less loss) from sales of assets				Number of returns			
	(8)	(9)	(10)	(11)	(12)	(13)	(14)	(15)
<b>All foundations</b>								
<b>Total</b>	<b>53,765</b>	<b>-5,556,396</b>	<b>90,797</b>	<b>56,184,890</b>	<b>90,682</b>	<b>-4,005,766</b>	<b>71,789</b>	<b>17,574,446</b>
Zero or unreported	* 310	* -3,371	1,239	108,573	830	-42,580	* 515	* 1,155
\$1 under \$100,000	5,725	-44,093	24,179	1,765,282	24,211	-315,699	11,806	35,863
\$100,000 under \$1,000,000	21,806	-370,068	34,822	3,514,107	34,923	-805,726	30,811	529,566
\$1,000,000 under \$10,000,000	20,340	-1,588,872	24,358	8,424,076	24,503	-1,583,282	22,807	2,475,461
\$10,000,000 under \$25,000,000	3,022	-649,870	3,415	6,224,874	3,424	-231,342	3,224	1,858,940
\$25,000,000 under \$50,000,000	1,216	-840,796	1,341	4,861,974	1,346	-674,938	1,256	1,404,006
\$50,000,000 under \$100,000,000	685	-734,093	738	4,652,571	739	-1,052,777	700	1,654,266
\$100,000,000 or more	662	-1,325,233	705	26,633,432	705	700,578	670	9,615,190
<b>Nonoperating foundations</b>								
<b>Total</b>	<b>51,750</b>	<b>-5,152,165</b>	<b>82,996</b>	<b>47,967,472</b>	<b>82,928</b>	<b>-3,396,212</b>	<b>67,422</b>	<b>16,612,123</b>
Zero or unreported	* 309	* -3,362	1,033	100,003	727	-37,608	* 515	* 1,155
\$1 under \$100,000	5,315	-43,895	20,494	1,613,333	20,526	-328,491	10,576	35,074
\$100,000 under \$1,000,000	21,422	-370,675	32,901	2,396,205	32,956	-784,839	29,316	513,426
\$1,000,000 under \$10,000,000	19,496	-1,562,810	22,869	7,309,971	23,005	-1,684,220	21,589	2,390,407
\$10,000,000 under \$25,000,000	2,836	-636,386	3,148	4,473,829	3,156	-380,452	3,002	1,779,843
\$25,000,000 under \$50,000,000	1,133	-808,983	1,231	3,876,235	1,237	-717,356	1,167	1,283,276
\$50,000,000 under \$100,000,000	635	-695,080	681	3,989,349	681	-1,124,477	649	1,575,333
\$100,000,000 or more	604	-1,030,974	639	24,208,548	639	1,661,232	607	9,033,610
<b>Operating foundations</b>								
<b>Total</b>	<b>2,015</b>	<b>-404,231</b>	<b>7,800</b>	<b>8,217,418</b>	<b>7,754</b>	<b>-609,554</b>	<b>4,367</b>	<b>962,323</b>
Zero or unreported	* 1	* -9	* 206	* 8,570	* 103	* -4,972	* 0	* 0
\$1 under \$100,000	* 409	* -199	3,685	151,950	3,685	12,792	1,230	789
\$100,000 under \$1,000,000	385	608	1,921	1,117,902	1,967	-20,887	1,495	16,140
\$1,000,000 under \$10,000,000	843	-26,062	1,489	1,114,104	1,498	100,939	1,217	85,054
\$10,000,000 under \$25,000,000	186	-13,484	267	1,751,045	268	149,110	222	79,097
\$25,000,000 under \$50,000,000	83	-31,813	110	985,740	109	42,417	89	120,729
\$50,000,000 under \$100,000,000	50	-39,012	57	663,222	58	71,700	51	78,933
\$100,000,000 or more	58	-294,259	66	2,424,884	66	-960,654	63	581,580
<b>Grantmaking foundations</b>								
<b>Total</b>	<b>50,718</b>	<b>-5,380,910</b>	<b>77,213</b>	<b>52,946,300</b>	<b>76,957</b>	<b>-7,328,469</b>	<b>65,088</b>	<b>17,202,680</b>
Zero or unreported	* 309	* -3,050	823	101,697	619	-37,318	* 411	* 1,153
\$1 under \$100,000	4,773	-30,394	16,540	1,522,122	16,540	-365,737	9,337	34,495
\$100,000 under \$1,000,000	20,690	-279,856	31,156	2,432,879	31,107	-844,226	28,175	513,327
\$1,000,000 under \$10,000,000	19,598	-1,536,849	22,838	7,653,242	22,838	-2,140,947	21,601	2,407,917
\$10,000,000 under \$25,000,000	2,875	-665,977	3,207	5,665,666	3,205	-581,499	3,050	1,789,945
\$25,000,000 under \$50,000,000	1,164	-826,647	1,262	4,582,599	1,261	-918,618	1,194	1,369,726
\$50,000,000 under \$100,000,000	669	-724,983	709	4,548,813	709	-1,210,901	676	1,629,763
\$100,000,000 or more	640	-1,313,155	677	26,439,282	677	-1,229,224	643	9,456,353

Footnotes at end of table.

# Domestic Private Foundations and Related Excise Taxes, Tax Year 2009

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**Table 1. Domestic Private Foundations: Number and Selected Financial Data, by Type of Foundation and Size of End-of-year Fair Market Value of Total Assets, Tax Year 2009—Continued**

[All figures are estimates based on a sample—money amounts are in thousands of dollars]

Type of foundation, asset size	Selected sources of revenue—continued		Total expenses		Excess of revenue (less loss) over expenses		Net investment income	
	Net gain (less loss) from sales of assets							
	Number of returns	Amount	Number of returns	Amount	Number of returns	Amount	Number of returns	Amount
	(8)	(9)	(10)	(11)	(12)	(13)	(14)	(15)
<b>Grantmaking-nonoperating foundations</b>								
<b>Total</b>	<b>49,409</b>	<b>-5,013,126</b>	<b>73,196</b>	<b>47,063,715</b>	<b>73,044</b>	<b>-6,153,138</b>	<b>62,728</b>	<b>16,506,201</b>
Zero or unreported	* 308	* -3,042	720	98,067	618	-37,286	* 411	* 1,153
\$1 under \$100,000	4,466	-30,174	14,595	1,430,954	14,595	-378,489	8,620	34,064
\$100,000 under \$1,000,000	20,404	-280,615	30,207	2,330,948	30,158	-840,985	27,392	498,479
\$1,000,000 under \$10,000,000	19,085	-1,514,870	22,074	6,912,932	22,074	-2,114,746	20,964	2,365,252
\$10,000,000 under \$25,000,000	2,792	-647,086	3,090	4,360,636	3,089	-690,999	2,952	1,753,112
\$25,000,000 under \$50,000,000	1,120	-814,076	1,206	3,779,242	1,206	-983,402	1,146	1,273,196
\$50,000,000 under \$100,000,000	633	-694,013	672	3,963,738	672	-1,238,914	642	1,573,373
\$100,000,000 or more	601	-1,029,252	632	24,187,198	632	131,683	600	9,007,573
<b>Grantmaking-operating foundations</b>								
<b>Total</b>	<b>1,309</b>	<b>-367,784</b>	<b>4,017</b>	<b>5,882,585</b>	<b>3,913</b>	<b>-1,175,331</b>	<b>2,360</b>	<b>696,479</b>
Zero or unreported	* 1	* -9	* 103	* 3,630	* 1	* -32	* 0	* 0
\$1 under \$100,000	* 307	* -220	1,945	91,168	1,945	12,752	* 717	* 432
\$100,000 under \$1,000,000	* 286	* 760	950	101,932	950	-3,240	782	14,849
\$1,000,000 under \$10,000,000	513	-21,979	764	740,310	764	-26,201	637	42,666
\$10,000,000 under \$25,000,000	83	-18,891	117	1,305,030	116	109,500	98	36,833
\$25,000,000 under \$50,000,000	44	-12,571	56	803,357	55	64,784	48	96,530
\$50,000,000 under \$100,000,000	36	-30,971	37	585,075	37	28,013	34	56,390
\$100,000,000 or more	39	-283,903	45	2,252,084	45	-1,360,907	43	448,780

Footnotes at end of table.

# Domestic Private Foundations and Related Excise Taxes, Tax Year 2009

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**Table 1. Domestic Private Foundations: Number and Selected Financial Data, by Type of Foundation and Size of End-of-year Fair Market Value of Total Assets, Tax Year 2009—Continued**

[All figures are estimates based on a sample—money amounts are in thousands of dollars]

Type of foundation, asset size	Disbursements for exempt purposes		Contributions, gifts, and grants paid [1]		Excise tax on net investment income		Total assets (book value) [2]	
	Number of returns	Amount	Number of returns	Amount	Number of returns	Amount	Number of returns	Amount
	(16)	(17)	(18)	(19)	(20)	(21)	(22)	(23)
<b>All foundations</b>								
<b>Total</b>	<b>84,763</b>	<b>48,061,907</b>	<b>77,316</b>	<b>40,913,645</b>	<b>66,743</b>	<b>220,966</b>	<b>91,380</b>	<b>550,893,728</b>
Zero or unreported	1,028	104,909	823	99,052	* 412	* 12	0	0
\$1 under \$100,000	20,473	1,565,324	16,642	1,347,324	8,489	431	25,562	960,239
\$100,000 under \$1,000,000	33,217	3,114,001	31,156	2,076,294	29,781	7,207	35,077	14,513,181
\$1,000,000 under \$10,000,000	23,895	7,185,970	22,838	6,233,279	22,348	34,571	24,520	72,278,063
\$10,000,000 under \$25,000,000	3,382	5,531,227	3,207	4,708,750	3,151	25,994	3,429	48,886,322
\$25,000,000 under \$50,000,000	1,331	4,328,691	1,262	3,761,612	1,223	18,985	1,347	42,949,965
\$50,000,000 under \$100,000,000	735	4,229,051	709	3,681,854	686	21,958	740	47,566,969
\$100,000,000 or more	701	22,002,734	677	19,005,479	653	111,808	705	323,738,988
<b>Nonoperating foundations</b>								
<b>Total</b>	<b>77,854</b>	<b>42,152,689</b>	<b>73,299</b>	<b>38,422,260</b>	<b>63,424</b>	<b>211,119</b>	<b>83,622</b>	<b>509,852,492</b>
Zero or unreported	822	96,342	720	95,426	* 412	* 12	0	0
\$1 under \$100,000	17,403	1,477,705	14,698	1,328,737	7,772	416	21,775	863,425
\$100,000 under \$1,000,000	31,448	2,139,433	30,207	2,040,290	28,442	6,963	33,110	13,842,937
\$1,000,000 under \$10,000,000	22,510	6,373,787	22,074	5,962,341	21,390	33,621	23,021	67,830,512
\$10,000,000 under \$25,000,000	3,131	3,989,437	3,090	3,665,651	2,990	25,197	3,158	45,024,031
\$25,000,000 under \$50,000,000	1,226	3,540,566	1,206	3,226,822	1,163	17,821	1,237	39,590,834
\$50,000,000 under \$100,000,000	678	3,659,523	672	3,270,193	647	21,087	682	43,968,950
\$100,000,000 or more	635	20,875,897	632	18,832,800	608	106,002	639	298,731,804
<b>Operating foundations</b>								
<b>Total</b>	<b>6,909</b>	<b>5,909,217</b>	<b>4,017</b>	<b>2,491,385</b>	<b>3,319</b>	<b>9,847</b>	<b>7,758</b>	<b>41,041,235</b>
Zero or unreported	* 206	* 8,568	* 103	* 3,626	* 0	* 0	* 0	* 0
\$1 under \$100,000	3,070	87,619	1,945	18,587	* 717	* 14	3,787	96,815
\$100,000 under \$1,000,000	1,769	974,568	950	36,003	1,339	244	1,967	670,245
\$1,000,000 under \$10,000,000	1,385	812,184	764	270,938	958	950	1,499	4,447,550
\$10,000,000 under \$25,000,000	251	1,541,789	117	1,043,099	161	797	271	3,862,292
\$25,000,000 under \$50,000,000	105	788,125	56	534,790	60	1,164	110	3,359,131
\$50,000,000 under \$100,000,000	57	569,527	37	411,661	39	871	58	3,598,019
\$100,000,000 or more	66	1,126,838	45	172,680	45	5,806	66	25,007,184
<b>Grantmaking foundations</b>								
<b>Total</b>	<b>77,316</b>	<b>45,928,225</b>	<b>77,316</b>	<b>40,913,645</b>	<b>61,683</b>	<b>215,971</b>	<b>76,492</b>	<b>531,244,192</b>
Zero or unreported	823	99,968	823	99,052	* 411	* 12	0	0
\$1 under \$100,000	16,642	1,442,813	16,642	1,347,324	6,868	407	16,642	701,499
\$100,000 under \$1,000,000	31,156	2,189,559	31,156	2,076,294	27,504	6,937	31,156	13,131,764
\$1,000,000 under \$10,000,000	22,838	6,874,783	22,838	6,233,279	21,396	33,867	22,838	67,862,770
\$10,000,000 under \$25,000,000	3,207	5,144,359	3,207	4,708,750	3,019	25,071	3,207	45,836,655
\$25,000,000 under \$50,000,000	1,262	4,141,951	1,262	3,761,612	1,183	18,657	1,262	40,317,182
\$50,000,000 under \$100,000,000	709	4,165,913	709	3,681,854	667	21,745	709	45,691,159
\$100,000,000 or more	677	21,868,879	677	19,005,479	634	109,274	677	317,703,162

Footnotes at end of table.

# Domestic Private Foundations and Related Excise Taxes, Tax Year 2009

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**Table 1. Domestic Private Foundations: Number and Selected Financial Data, by Type of Foundation and Size of End-of-year Fair Market Value of Total Assets, Tax Year 2009—Continued**

[All figures are estimates based on a sample—money amounts are in thousands of dollars]

Type of foundation, asset size	Disbursements for exempt purposes		Contributions, gifts, and grants paid [1]		Excise tax on net investment income		Total assets (book value) [2]	
	Number of returns	Amount	Number of returns	Amount	Number of returns	Amount	Number of returns	Amount
	(16)	(17)	(18)	(19)	(20)	(21)	(22)	(23)
<b>Grantmaking-nonoperating foundations</b>								
<b>Total</b>	<b>73,299</b>	<b>41,905,689</b>	<b>73,299</b>	<b>38,422,260</b>	<b>59,660</b>	<b>209,241</b>	<b>72,578</b>	<b>501,499,411</b>
Zero or unreported	720	96,341	720	95,426	* 411	* 12	0	0
\$1 under \$100,000	14,698	1,390,628	14,698	1,328,737	6,355	399	14,698	640,835
\$100,000 under \$1,000,000	30,207	2,126,808	30,207	2,040,290	26,723	6,709	30,207	12,712,318
\$1,000,000 under \$10,000,000	22,074	6,343,553	22,074	5,962,341	20,841	33,257	22,074	65,746,584
\$10,000,000 under \$25,000,000	3,090	3,955,706	3,090	3,665,651	2,943	24,684	3,090	44,094,180
\$25,000,000 under \$50,000,000	1,206	3,466,279	1,206	3,226,822	1,144	17,638	1,206	38,575,832
\$50,000,000 under \$100,000,000	672	3,651,350	672	3,270,193	641	21,052	672	43,216,031
\$100,000,000 or more	632	20,875,024	632	18,832,800	601	105,489	632	296,513,632
<b>Grantmaking-operating foundations</b>								
<b>Total</b>	<b>4,017</b>	<b>4,022,536</b>	<b>4,017</b>	<b>2,491,385</b>	<b>2,023</b>	<b>6,730</b>	<b>3,914</b>	<b>29,744,781</b>
Zero or unreported	* 103	* 3,627	* 103	* 3,626	* 0	* 0	* 0	* 0
\$1 under \$100,000	1,945	52,185	1,945	18,587	* 513	* 7	1,945	60,664
\$100,000 under \$1,000,000	950	62,751	950	36,003	781	228	950	419,446
\$1,000,000 under \$10,000,000	764	531,229	764	270,938	555	610	764	2,116,187
\$10,000,000 under \$25,000,000	117	1,188,653	117	1,043,099	76	388	117	1,742,476
\$25,000,000 under \$50,000,000	56	675,672	56	534,790	39	1,018	56	1,741,350
\$50,000,000 under \$100,000,000	37	514,564	37	411,661	26	693	37	2,475,129
\$100,000,000 or more	45	993,854	45	172,680	33	3,786	45	21,189,530

Footnotes at end of table.

# Domestic Private Foundations and Related Excise Taxes, Tax Year 2009

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**Table 1. Domestic Private Foundations: Number and Selected Financial Data, by Type of Foundation and Size of End-of-year Fair Market Value of Total Assets, Tax Year 2009—Continued**

[All figures are estimates based on a sample—money amounts are in thousands of dollars]

Type of foundation, asset size	Total investment assets (book value) [2]		Investments in securities (book value)			
			Total		Government obligations	
	Number of returns	Amount	Number of returns	Amount	Number of returns	Amount
(24)	(25)	(26)	(27)	(28)	(29)	
<b>All foundations</b>						
<b>Total</b>	<b>78,338</b>	<b>505,143,148</b>	<b>58,242</b>	<b>302,869,455</b>	<b>14,301</b>	<b>34,968,228</b>
Zero or unreported	0	0	0	0	0	0
\$1 under \$100,000	15,633	762,788	7,104	339,649	939	16,094
\$100,000 under \$1,000,000	32,418	12,835,872	24,572	8,568,837	4,857	511,817
\$1,000,000 under \$10,000,000	24,123	65,542,781	21,012	46,318,095	6,066	3,300,542
\$10,000,000 under \$25,000,000	3,388	44,577,484	3,047	30,430,199	1,301	2,792,858
\$25,000,000 under \$50,000,000	1,333	38,858,275	1,185	25,321,379	526	2,285,019
\$50,000,000 under \$100,000,000	738	44,243,876	670	27,909,515	312	2,849,801
\$100,000,000 or more	704	298,322,074	652	163,981,781	300	23,212,096
<b>Nonoperating foundations</b>						
<b>Total</b>	<b>72,884</b>	<b>475,327,155</b>	<b>55,643</b>	<b>289,526,789</b>	<b>13,530</b>	<b>33,863,313</b>
Zero or unreported	0	0	0	0	0	0
\$1 under \$100,000	13,483	714,791	6,386	314,595	734	10,194
\$100,000 under \$1,000,000	30,958	12,344,908	23,973	8,395,098	4,711	492,503
\$1,000,000 under \$10,000,000	22,759	62,928,240	20,082	44,926,128	5,798	3,183,485
\$10,000,000 under \$25,000,000	3,138	42,356,954	2,872	29,189,913	1,224	2,636,712
\$25,000,000 under \$50,000,000	1,228	36,991,338	1,109	24,299,339	495	2,216,999
\$50,000,000 under \$100,000,000	680	41,495,178	624	26,524,800	291	2,736,599
\$100,000,000 or more	638	278,495,746	596	155,876,916	277	22,586,822
<b>Operating foundations</b>						
<b>Total</b>	<b>5,454</b>	<b>29,815,993</b>	<b>2,600</b>	<b>13,342,665</b>	<b>771</b>	<b>1,104,914</b>
Zero or unreported	* 0	* 0	* 0	* 0	* 0	* 0
\$1 under \$100,000	2,150	47,996	* 718	* 25,054	* 205	* 5,900
\$100,000 under \$1,000,000	1,460	490,963	599	173,739	* 146	* 19,314
\$1,000,000 under \$10,000,000	1,365	2,614,541	930	1,391,967	268	117,058
\$10,000,000 under \$25,000,000	250	2,220,529	175	1,240,286	77	156,145
\$25,000,000 under \$50,000,000	105	1,866,937	76	1,022,040	31	68,020
\$50,000,000 under \$100,000,000	58	2,748,698	46	1,384,715	21	113,202
\$100,000,000 or more	66	19,826,329	56	8,104,864	23	625,274
<b>Grantmaking foundations</b>						
<b>Total</b>	<b>69,792</b>	<b>492,041,213</b>	<b>54,599</b>	<b>295,940,776</b>	<b>13,606</b>	<b>34,166,127</b>
Zero or unreported	0	0	0	0	0	0
\$1 under \$100,000	11,913	585,358	5,921	300,153	832	10,773
\$100,000 under \$1,000,000	29,373	11,864,212	23,171	8,120,873	4,590	472,815
\$1,000,000 under \$10,000,000	22,679	63,098,378	20,188	44,871,765	5,843	3,130,781
\$10,000,000 under \$25,000,000	3,188	42,746,033	2,907	29,407,106	1,236	2,637,171
\$25,000,000 under \$50,000,000	1,254	37,278,637	1,132	24,445,633	505	2,223,031
\$50,000,000 under \$100,000,000	709	42,895,320	651	27,357,924	306	2,808,248
\$100,000,000 or more	676	293,573,276	629	161,437,323	293	22,883,308

Footnotes at end of table.

# Domestic Private Foundations and Related Excise Taxes, Tax Year 2009

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**Table 1. Domestic Private Foundations: Number and Selected Financial Data, by Type of Foundation and Size of End-of-year Fair Market Value of Total Assets, Tax Year 2009—Continued**

[All figures are estimates based on a sample—money amounts are in thousands of dollars]

Type of foundation, asset size	Total investment assets (book value) [2]		Investments in securities (book value)			
			Total		Government obligations	
	Number of returns	Amount	Number of returns	Amount	Number of returns	Amount
	(24)	(25)	(26)	(27)	(28)	(29)
<b>Grantmaking-nonoperating foundations</b>						
<b>Total</b>	<b>66,670</b>	<b>469,445,147</b>	<b>52,918</b>	<b>286,404,544</b>	<b>13,139</b>	<b>33,577,344</b>
Zero or unreported	0	0	0	0	0	0
\$1 under \$100,000	10,582	556,690	5,409	282,426	730	10,107
\$100,000 under \$1,000,000	28,576	11,527,364	22,724	7,963,459	4,490	456,270
\$1,000,000 under \$10,000,000	21,930	61,588,365	19,654	44,126,511	5,654	3,062,267
\$10,000,000 under \$25,000,000	3,077	41,680,580	2,828	28,822,230	1,209	2,593,150
\$25,000,000 under \$50,000,000	1,201	36,300,195	1,092	23,929,555	490	2,202,513
\$50,000,000 under \$100,000,000	672	40,979,289	621	26,392,057	290	2,727,336
\$100,000,000 or more	631	276,812,665	590	154,888,306	275	22,525,702
<b>Grantmaking-operating foundations</b>						
<b>Total</b>	<b>3,123</b>	<b>22,596,065</b>	<b>1,681</b>	<b>9,536,233</b>	<b>466</b>	<b>588,783</b>
Zero or unreported	* 0	* 0	* 0	* 0	* 0	* 0
\$1 under \$100,000	1,331	28,668	* 513	* 17,727	* 102	* 666
\$100,000 under \$1,000,000	797	336,848	447	157,414	* 100	* 16,545
\$1,000,000 under \$10,000,000	749	1,510,013	533	745,254	188	68,514
\$10,000,000 under \$25,000,000	111	1,065,453	79	584,876	27	44,021
\$25,000,000 under \$50,000,000	53	978,441	40	516,078	15	20,518
\$50,000,000 under \$100,000,000	37	1,916,031	30	965,867	16	80,912
\$100,000,000 or more	45	16,760,611	39	6,549,017	18	357,606

Footnotes at end of table.

# Domestic Private Foundations and Related Excise Taxes, Tax Year 2009

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**Table 1. Domestic Private Foundations: Number and Selected Financial Data, by Type of Foundation and Size of End-of-year Fair Market Value of Total Assets, Tax Year 2009—Continued**

[All figures are estimates based on a sample—money amounts are in thousands of dollars]

Type of foundation, asset size	Investments in securities (book value)—continued				Total assets (fair market value) [2]	
	Corporate stock		Corporate bonds			
	Number of returns	Amount	Number of returns	Amount	Number of returns	Amount
(30)	(31)	(32)	(33)	(34)	(35)	
<b>All foundations</b>						
<b>Total</b>	<b>54,837</b>	<b>222,734,464</b>	<b>27,160</b>	<b>45,166,763</b>	<b>91,380</b>	<b>588,534,809</b>
Zero or unreported	0	0	0	0	0	0
\$1 under \$100,000	6,170	288,546	1,874	35,008	25,562	764,584
\$100,000 under \$1,000,000	23,119	6,821,523	10,187	1,235,497	35,077	14,793,296
\$1,000,000 under \$10,000,000	20,200	35,659,620	11,558	7,357,932	24,520	77,041,243
\$10,000,000 under \$25,000,000	2,931	22,220,903	1,902	5,416,439	3,429	52,995,438
\$25,000,000 under \$50,000,000	1,134	18,748,639	750	4,287,721	1,347	46,588,702
\$50,000,000 under \$100,000,000	653	20,603,100	441	4,456,614	740	51,199,867
\$100,000,000 or more	630	118,392,133	447	22,377,551	705	345,151,679
<b>Nonoperating foundations</b>						
<b>Total</b>	<b>52,593</b>	<b>212,405,172</b>	<b>26,403</b>	<b>43,258,304</b>	<b>83,622</b>	<b>539,711,861</b>
Zero or unreported	0	0	0	0	0	0
\$1 under \$100,000	5,554	273,241	1,772	31,160	21,775	668,568
\$100,000 under \$1,000,000	22,665	6,668,721	10,132	1,233,875	33,110	14,044,990
\$1,000,000 under \$10,000,000	19,356	34,519,172	11,172	7,223,471	23,021	72,271,792
\$10,000,000 under \$25,000,000	2,765	21,355,736	1,806	5,197,465	3,158	48,770,669
\$25,000,000 under \$50,000,000	1,063	17,968,059	702	4,114,281	1,237	42,827,442
\$50,000,000 under \$100,000,000	608	19,563,834	410	4,224,367	682	47,300,660
\$100,000,000 or more	581	112,056,410	409	21,233,685	639	313,827,740
<b>Operating foundations</b>						
<b>Total</b>	<b>2,244</b>	<b>10,329,292</b>	<b>756</b>	<b>1,908,459</b>	<b>7,758</b>	<b>48,822,948</b>
Zero or unreported	* 0	* 0	* 0	* 0	* 0	* 0
\$1 under \$100,000	* 616	* 15,305	* 102	* 3,849	3,787	96,016
\$100,000 under \$1,000,000	454	152,802	* 55	* 1,623	1,967	748,306
\$1,000,000 under \$10,000,000	843	1,140,449	386	134,461	1,499	4,769,451
\$10,000,000 under \$25,000,000	166	865,167	96	218,974	271	4,224,768
\$25,000,000 under \$50,000,000	71	780,580	48	173,440	110	3,761,260
\$50,000,000 under \$100,000,000	45	1,039,266	31	232,247	58	3,899,207
\$100,000,000 or more	49	6,335,724	38	1,143,866	66	31,323,938
<b>Grantmaking foundations</b>						
<b>Total</b>	<b>51,537</b>	<b>217,551,091</b>	<b>26,240</b>	<b>44,223,558</b>	<b>76,492</b>	<b>565,569,416</b>
Zero or unreported	0	0	0	0	0	0
\$1 under \$100,000	5,095	255,735	1,658	33,645	16,642	561,091
\$100,000 under \$1,000,000	21,868	6,428,101	9,986	1,219,957	31,156	13,532,369
\$1,000,000 under \$10,000,000	19,448	34,515,515	11,198	7,225,469	22,838	72,316,669
\$10,000,000 under \$25,000,000	2,797	21,530,409	1,815	5,239,526	3,207	49,610,398
\$25,000,000 under \$50,000,000	1,085	18,117,584	719	4,105,018	1,262	43,669,402
\$50,000,000 under \$100,000,000	634	20,163,821	433	4,385,855	709	49,085,372
\$100,000,000 or more	610	116,539,927	431	22,014,088	677	336,794,114

Footnotes at end of table.

# Domestic Private Foundations and Related Excise Taxes, Tax Year 2009

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**Table 1. Domestic Private Foundations: Number and Selected Financial Data, by Type of Foundation and Size of End-of-year Fair Market Value of Total Assets, Tax Year 2009—Continued**

[All figures are estimates based on a sample—money amounts are in thousands of dollars]

Type of foundation, asset size	Investments in securities (book value)—continued				Total assets (fair market value) [2]	
	Corporate stock		Corporate bonds			
	Number of returns	Amount	Number of returns	Amount	Number of returns	Amount
(30)	(31)	(32)	(33)	(34)	(35)	
<b>Grantmaking-nonoperating foundations</b>						
<b>Total</b>	<b>50,020</b>	<b>210,042,990</b>	<b>25,777</b>	<b>42,784,210</b>	<b>72,578</b>	<b>530,993,221</b>
Zero or unreported	0	0	0	0	0	0
\$1 under \$100,000	4,582	242,522	1,556	29,796	14,698	502,634
\$100,000 under \$1,000,000	21,520	6,287,348	9,984	1,219,841	30,207	13,054,547
\$1,000,000 under \$10,000,000	18,965	33,937,557	10,949	7,126,688	22,074	70,056,637
\$10,000,000 under \$25,000,000	2,723	21,094,590	1,781	5,134,490	3,090	47,765,885
\$25,000,000 under \$50,000,000	1,047	17,705,932	692	4,021,110	1,206	41,772,683
\$50,000,000 under \$100,000,000	605	19,466,942	409	4,197,779	672	46,523,977
\$100,000,000 or more	577	111,308,100	406	21,054,505	632	311,316,859
<b>Grantmaking-operating foundations</b>						
<b>Total</b>	<b>1,517</b>	<b>7,508,101</b>	<b>463</b>	<b>1,439,349</b>	<b>3,914</b>	<b>34,576,194</b>
Zero or unreported	* 0	* 0	* 0	* 0	* 0	* 0
\$1 under \$100,000	* 513	* 13,213	* 102	* 3,849	1,945	58,457
\$100,000 under \$1,000,000	348	140,753	* 2	* 116	950	477,822
\$1,000,000 under \$10,000,000	483	577,959	249	98,781	764	2,260,031
\$10,000,000 under \$25,000,000	74	435,818	34	105,036	117	1,844,514
\$25,000,000 under \$50,000,000	38	411,652	27	83,908	56	1,896,720
\$50,000,000 under \$100,000,000	29	696,880	24	188,076	37	2,561,395
\$100,000,000 or more	33	5,231,827	25	959,583	45	25,477,256

Footnotes at end of table.

# Domestic Private Foundations and Related Excise Taxes, Tax Year 2009

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**Table 1. Domestic Private Foundations: Number and Selected Financial Data, by Type of Foundation and Size of End-of-year Fair Market Value of Total Assets, Tax Year 2009—Continued**

[All figures are estimates based on a sample—money amounts are in thousands of dollars]

Type of foundation, asset size	Total investment assets (fair market value) [2]		Investments in securities (fair market value)					
			Total		Government obligations		Corporate stock	
	Number of returns	Amount	Number of returns	Amount	Number of returns	Amount	Number of returns	Amount
(36)	(37)	(38)	(39)	(40)	(41)	(42)	(43)	
<b>All foundations</b>								
<b>Total</b>	<b>78,338</b>	<b>539,848,926</b>	<b>58,242</b>	<b>324,672,693</b>	<b>14,301</b>	<b>35,414,535</b>	<b>54,837</b>	<b>243,423,270</b>
Zero or unreported	0	0	0	0	0	0	0	0
\$1 under \$100,000	15,633	571,157	7,104	277,126	939	15,720	6,170	225,587
\$100,000 under \$1,000,000	32,418	13,082,860	24,572	8,837,374	4,857	528,449	23,119	7,053,107
\$1,000,000 under \$10,000,000	24,123	69,921,078	21,012	50,072,055	6,066	3,417,177	20,200	39,178,561
\$10,000,000 under \$25,000,000	3,388	48,355,855	3,047	33,464,300	1,301	2,870,515	2,931	25,044,774
\$25,000,000 under \$50,000,000	1,333	42,140,586	1,185	27,641,179	526	2,346,927	1,134	20,945,166
\$50,000,000 under \$100,000,000	738	47,546,736	670	30,231,451	312	2,908,591	653	22,783,044
\$100,000,000 or more	704	318,230,653	652	174,149,208	300	23,327,156	630	128,193,032
<b>Nonoperating foundations</b>								
<b>Total</b>	<b>72,884</b>	<b>503,177,905</b>	<b>55,643</b>	<b>311,034,653</b>	<b>13,530</b>	<b>34,306,568</b>	<b>52,593</b>	<b>232,763,330</b>
Zero or unreported	0	0	0	0	0	0	0	0
\$1 under \$100,000	13,483	525,066	6,386	253,711	734	9,820	5,554	212,125
\$100,000 under \$1,000,000	30,958	12,577,173	23,973	8,661,883	4,711	510,156	22,665	6,897,534
\$1,000,000 under \$10,000,000	22,759	67,215,955	20,082	48,695,474	5,798	3,299,672	19,356	38,055,153
\$10,000,000 under \$25,000,000	3,138	45,953,285	2,872	32,135,526	1,224	2,711,707	2,765	24,092,672
\$25,000,000 under \$50,000,000	1,228	40,115,458	1,109	26,576,793	495	2,281,586	1,063	20,119,456
\$50,000,000 under \$100,000,000	680	44,648,243	624	28,759,531	291	2,794,401	608	21,661,059
\$100,000,000 or more	638	292,142,725	596	165,951,735	277	22,699,226	581	121,725,331
<b>Operating foundations</b>								
<b>Total</b>	<b>5,454</b>	<b>36,671,021</b>	<b>2,600</b>	<b>13,638,041</b>	<b>771</b>	<b>1,107,967</b>	<b>2,244</b>	<b>10,659,941</b>
Zero or unreported	* 0	* 0	* 0	* 0	* 0	* 0	* 0	* 0
\$1 under \$100,000	2,150	46,091	* 718	* 23,415	* 205	* 5,899	* 616	* 13,463
\$100,000 under \$1,000,000	1,460	505,687	599	175,491	* 146	* 18,293	454	155,573
\$1,000,000 under \$10,000,000	1,365	2,705,123	930	1,376,581	268	117,505	843	1,123,407
\$10,000,000 under \$25,000,000	250	2,402,570	175	1,328,774	77	158,808	166	952,101
\$25,000,000 under \$50,000,000	105	2,025,128	76	1,064,386	31	65,341	71	825,710
\$50,000,000 under \$100,000,000	58	2,898,493	46	1,471,920	21	114,191	45	1,121,985
\$100,000,000 or more	66	26,087,928	56	8,197,473	23	627,930	49	6,467,701
<b>Grantmaking foundations</b>								
<b>Total</b>	<b>69,792</b>	<b>524,101,640</b>	<b>54,599</b>	<b>317,213,992</b>	<b>13,606</b>	<b>34,612,780</b>	<b>51,537</b>	<b>237,718,177</b>
Zero or unreported	0	0	0	0	0	0	0	0
\$1 under \$100,000	11,913	449,539	5,921	234,471	832	10,398	5,095	189,570
\$100,000 under \$1,000,000	29,373	12,221,986	23,171	8,474,909	4,590	489,407	21,868	6,745,009
\$1,000,000 under \$10,000,000	22,679	67,415,487	20,188	48,606,466	5,843	3,247,141	19,448	38,016,849
\$10,000,000 under \$25,000,000	3,188	46,324,817	2,907	32,370,860	1,236	2,712,263	2,797	24,288,278
\$25,000,000 under \$50,000,000	1,254	40,459,533	1,132	26,677,499	505	2,287,347	1,085	20,223,603
\$50,000,000 under \$100,000,000	709	46,029,935	651	29,579,084	306	2,866,582	634	22,243,616
\$100,000,000 or more	676	311,200,342	629	171,270,704	293	22,999,643	610	126,011,251

Footnotes at end of table.

# Domestic Private Foundations and Related Excise Taxes, Tax Year 2009

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**Table 1. Domestic Private Foundations: Number and Selected Financial Data, by Type of Foundation and Size of End-of-year Fair Market Value of Total Assets, Tax Year 2009—Continued**

[All figures are estimates based on a sample—money amounts are in thousands of dollars]

Type of foundation, asset size	Total investment assets (fair market value) [2]		Investments in securities (fair market value)					
			Total		Government obligations		Corporate stock	
	Number of returns	Amount	Number of returns	Amount	Number of returns	Amount	Number of returns	Amount
	(36)	(37)	(38)	(39)	(40)	(41)	(42)	(43)
<b>Grantmaking-nonoperating foundations</b>								
<b>Total</b>	<b>66,670</b>	<b>496,986,039</b>	<b>52,918</b>	<b>307,570,448</b>	<b>13,139</b>	<b>34,019,666</b>	<b>50,020</b>	<b>230,061,886</b>
Zero or unreported	0	0	0	0	0	0	0	0
\$1 under \$100,000	10,582	423,077	5,409	218,684	730	9,732	4,582	178,501
\$100,000 under \$1,000,000	28,576	11,869,528	22,724	8,314,857	4,490	473,921	21,520	6,600,561
\$1,000,000 under \$10,000,000	21,930	65,821,253	19,654	47,856,213	5,654	3,178,416	18,965	37,435,474
\$10,000,000 under \$25,000,000	3,077	45,219,156	2,828	31,742,060	1,209	2,667,957	2,723	23,805,734
\$25,000,000 under \$50,000,000	1,201	39,382,619	1,092	26,138,330	490	2,266,377	1,047	19,790,097
\$50,000,000 under \$100,000,000	672	44,103,472	621	28,626,788	290	2,785,138	605	21,564,166
\$100,000,000 or more	631	290,166,935	590	164,673,516	275	22,638,125	577	120,687,353
<b>Grantmaking-operating foundations</b>								
<b>Total</b>	<b>3,123</b>	<b>27,115,600</b>	<b>1,681</b>	<b>9,643,544</b>	<b>466</b>	<b>593,114</b>	<b>1,517</b>	<b>7,656,291</b>
Zero or unreported	* 0	* 0	* 0	* 0	* 0	* 0	* 0	* 0
\$1 under \$100,000	1,331	26,461	* 513	* 15,787	* 102	* 665	* 513	* 11,069
\$100,000 under \$1,000,000	797	352,458	447	160,052	* 100	* 15,486	348	144,448
\$1,000,000 under \$10,000,000	749	1,594,234	533	750,252	188	68,725	483	581,375
\$10,000,000 under \$25,000,000	111	1,105,662	79	628,800	27	44,306	74	482,544
\$25,000,000 under \$50,000,000	53	1,076,915	40	539,169	15	20,970	38	433,507
\$50,000,000 under \$100,000,000	37	1,926,464	30	952,295	16	81,443	29	679,450
\$100,000,000 or more	45	21,033,407	39	6,597,188	18	361,518	33	5,323,899

Footnotes at end of table.

# Domestic Private Foundations and Related Excise Taxes, Tax Year 2009

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**Table 1. Domestic Private Foundations: Number and Selected Financial Data, by Type of Foundation and Size of End-of-year Fair Market Value of Total Assets, Tax Year 2009—Continued**

[All figures are estimates based on a sample—money amounts are in thousands of dollars]

Type of foundation, asset size	Investments in securities (fair market value)—continued		Net worth (book value)		Noncharitable-use assets		Minimum investment return	
	Corporate bonds							
	Number of returns	Amount	Number of returns	Amount	Number of returns	Amount	Number of returns	Amount
(44)	(45)	(46)	(47)	(48)	(49)	(50)	(51)	
<b>All foundations</b>								
<b>Total</b>	<b>27,160</b>	<b>45,834,888</b>	<b>91,535</b>	<b>523,341,455</b>	<b>91,615</b>	<b>492,264,460</b>	<b>91,055</b>	<b>24,514,730</b>
Zero or unreported	0	0	* 207	* -529	519	25,485	519	1,274
\$1 under \$100,000	1,874	35,819	25,562	645,705	25,357	781,076	24,844	38,995
\$100,000 under \$1,000,000	10,187	1,255,818	35,030	14,261,887	35,025	13,249,643	34,977	659,638
\$1,000,000 under \$10,000,000	11,558	7,476,317	24,519	70,771,883	24,500	67,406,591	24,500	3,357,463
\$10,000,000 under \$25,000,000	1,902	5,549,011	3,425	47,744,363	3,427	45,754,464	3,427	2,279,806
\$25,000,000 under \$50,000,000	750	4,349,086	1,347	41,590,800	1,343	39,368,982	1,343	1,959,502
\$50,000,000 under \$100,000,000	441	4,539,816	740	46,111,445	740	44,184,304	740	2,203,258
\$100,000,000 or more	447	22,629,020	705	302,215,901	705	281,493,915	705	14,014,794
<b>Nonoperating foundations</b>								
<b>Total</b>	<b>26,403</b>	<b>43,964,755</b>	<b>83,778</b>	<b>486,689,393</b>	<b>83,778</b>	<b>467,187,950</b>	<b>83,319</b>	<b>23,262,146</b>
Zero or unreported	0	0	* 207	* -529	416	25,385	416	1,269
\$1 under \$100,000	1,772	31,766	21,775	552,629	21,570	722,155	21,159	36,049
\$100,000 under \$1,000,000	10,132	1,254,193	33,063	13,630,744	33,058	12,725,482	33,010	633,430
\$1,000,000 under \$10,000,000	11,172	7,340,649	23,021	66,691,452	23,021	64,904,260	23,021	3,233,483
\$10,000,000 under \$25,000,000	1,806	5,331,146	3,155	44,231,430	3,157	43,636,022	3,157	2,173,884
\$25,000,000 under \$50,000,000	702	4,175,751	1,237	38,670,917	1,235	37,742,226	1,235	1,878,166
\$50,000,000 under \$100,000,000	410	4,304,072	682	42,743,480	682	41,873,789	682	2,087,835
\$100,000,000 or more	409	21,527,178	639	280,169,270	639	265,558,631	639	13,218,030
<b>Operating foundations</b>								
<b>Total</b>	<b>756</b>	<b>1,870,133</b>	<b>7,756</b>	<b>36,652,062</b>	<b>7,838</b>	<b>25,076,510</b>	<b>7,735</b>	<b>1,252,584</b>
Zero or unreported	* 0	* 0	* 0	* 0	* 102	* 101	* 102	* 5
\$1 under \$100,000	* 102	* 4,053	3,787	93,077	3,787	58,921	3,685	2,946
\$100,000 under \$1,000,000	* 55	* 1,625	1,967	631,143	1,967	524,160	1,967	26,208
\$1,000,000 under \$10,000,000	386	135,668	1,498	4,080,431	1,479	2,502,332	1,479	123,980
\$10,000,000 under \$25,000,000	96	217,865	270	3,512,933	270	2,118,442	270	105,922
\$25,000,000 under \$50,000,000	48	173,335	110	2,919,882	108	1,626,756	108	81,336
\$50,000,000 under \$100,000,000	31	235,744	58	3,367,965	58	2,310,515	58	115,423
\$100,000,000 or more	38	1,101,843	66	22,046,631	66	15,935,283	66	796,764
<b>Grantmaking foundations</b>								
<b>Total</b>	<b>26,240</b>	<b>44,883,035</b>	<b>76,646</b>	<b>506,184,594</b>	<b>76,901</b>	<b>481,637,139</b>	<b>76,696</b>	<b>24,015,595</b>
Zero or unreported	0	0	* 205	* -529	* 413	* 25,379	* 413	* 1,269
\$1 under \$100,000	1,658	34,503	16,642	423,942	16,642	629,318	16,438	31,466
\$100,000 under \$1,000,000	9,986	1,240,493	31,109	12,971,547	31,156	12,344,944	31,155	615,799
\$1,000,000 under \$10,000,000	11,198	7,342,475	22,838	66,855,938	22,838	65,071,586	22,838	3,249,434
\$10,000,000 under \$25,000,000	1,815	5,370,319	3,203	45,029,266	3,206	44,073,504	3,206	2,199,026
\$25,000,000 under \$50,000,000	719	4,166,549	1,262	39,398,805	1,259	38,111,560	1,259	1,898,842
\$50,000,000 under \$100,000,000	433	4,468,886	709	44,618,009	709	43,119,733	709	2,151,713
\$100,000,000 or more	431	22,259,810	677	296,887,617	677	278,261,116	677	13,868,046

Footnotes at end of table.

# Domestic Private Foundations and Related Excise Taxes, Tax Year 2009

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**Table 1. Domestic Private Foundations: Number and Selected Financial Data, by Type of Foundation and Size of End-of-year Fair Market Value of Total Assets, Tax Year 2009—Continued**

[All figures are estimates based on a sample—money amounts are in thousands of dollars]

Type of foundation, asset size	Investments in securities (fair market value)—continued		Net worth (book value)		Noncharitable-use assets		Minimum investment return	
	Corporate bonds							
	Number of returns	Amount	Number of returns	Amount	Number of returns	Amount	Number of returns	Amount
	(44)	(45)	(46)	(47)	(48)	(49)	(50)	(51)
<b>Grantmaking-nonoperating foundations</b>								
<b>Total</b>	<b>25,777</b>	<b>43,488,896</b>	<b>72,733</b>	<b>479,558,041</b>	<b>72,991</b>	<b>462,334,153</b>	<b>72,887</b>	<b>23,050,855</b>
Zero or unreported	0	0	* 205	* -529	* 413	* 25,379	* 413	* 1,269
\$1 under \$100,000	1,556	30,450	14,698	363,278	14,698	592,232	14,595	29,612
\$100,000 under \$1,000,000	9,984	1,240,374	30,160	12,553,757	30,207	11,968,883	30,206	596,996
\$1,000,000 under \$10,000,000	10,949	7,242,323	22,074	64,915,722	22,074	63,589,184	22,074	3,175,722
\$10,000,000 under \$25,000,000	1,781	5,268,369	3,087	43,383,994	3,090	43,025,820	3,090	2,146,641
\$25,000,000 under \$50,000,000	692	4,081,856	1,206	37,814,005	1,205	37,264,317	1,205	1,856,482
\$50,000,000 under \$100,000,000	409	4,277,484	672	42,268,238	672	41,454,689	672	2,068,461
\$100,000,000 or more	406	21,348,039	632	278,259,576	632	264,413,649	632	13,175,673
<b>Grantmaking-operating foundations</b>								
<b>Total</b>	<b>463</b>	<b>1,394,139</b>	<b>3,913</b>	<b>26,626,554</b>	<b>3,911</b>	<b>19,302,986</b>	<b>3,808</b>	<b>964,740</b>
Zero or unreported	* 0	* 0	* 0	* 0	* 0	* 0	* 0	* 0
\$1 under \$100,000	* 102	* 4,053	1,945	60,664	1,945	37,086	1,842	1,854
\$100,000 under \$1,000,000	* 2	* 119	950	417,790	950	376,060	950	18,803
\$1,000,000 under \$10,000,000	249	100,152	764	1,940,216	764	1,482,402	764	73,713
\$10,000,000 under \$25,000,000	34	101,950	116	1,645,272	116	1,047,684	116	52,384
\$25,000,000 under \$50,000,000	27	84,692	56	1,584,801	54	847,243	54	42,360
\$50,000,000 under \$100,000,000	24	191,401	37	2,349,771	37	1,665,044	37	83,252
\$100,000,000 or more	25	911,771	45	18,628,041	45	13,847,467	45	692,373

Footnotes at end of table.

# Domestic Private Foundations and Related Excise Taxes, Tax Year 2009

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**Table 1. Domestic Private Foundations: Number and Selected Financial Data, by Type of Foundation and Size of End-of-year Fair Market Value of Total Assets, Tax Year 2009—Continued**

[All figures are estimates based on a sample—money amounts are in thousands of dollars]

Type of foundation, asset size	Distributable amount		Qualifying distributions		Undistributed income for 2009		Excess distributions carryover to 2010	
	Number of returns	Amount	Number of returns	Amount	Number of returns	Amount	Number of returns	Amount
(52)	(53)	(54)	(55)	(56)	(57)	(58)	(59)	
<b>All foundations</b>								
<b>Total</b>	<b>83,032</b>	<b>23,433,771</b>	<b>85,055</b>	<b>49,915,438</b>	<b>28,264</b>	<b>5,744,895</b>	<b>55,387</b>	<b>71,941,757</b>
Zero or unreported	416	1,258	1,028	104,909	* 3	* [3]	823	433,339
\$1 under \$100,000	21,055	36,521	20,577	1,570,567	5,055	7,142	16,103	5,631,176
\$100,000 under \$1,000,000	32,905	628,468	33,369	3,129,498	11,536	166,310	21,482	6,032,828
\$1,000,000 under \$10,000,000	22,954	3,214,369	23,925	7,335,673	9,314	989,984	13,625	15,977,330
\$10,000,000 under \$25,000,000	3,147	2,160,685	3,388	5,665,715	1,318	642,155	1,835	7,886,131
\$25,000,000 under \$50,000,000	1,234	1,877,881	1,332	4,475,986	497	578,514	737	8,114,687
\$50,000,000 under \$100,000,000	682	2,077,620	735	4,357,529	276	593,007	407	7,162,928
\$100,000,000 or more	639	13,436,970	701	23,275,560	265	2,767,781	374	20,703,338
<b>Nonoperating foundations</b>								
<b>Total</b>	<b>83,032</b>	<b>23,433,771</b>	<b>78,120</b>	<b>43,280,524</b>	<b>28,264</b>	<b>5,744,895</b>	<b>55,387</b>	<b>71,941,757</b>
Zero or unreported	416	1,258	822	96,342	* 3	* [3]	823	433,339
\$1 under \$100,000	21,055	36,521	17,507	1,482,319	5,055	7,142	16,103	5,631,176
\$100,000 under \$1,000,000	32,905	628,468	31,600	2,154,655	11,536	166,310	21,482	6,032,828
\$1,000,000 under \$10,000,000	22,954	3,214,369	22,520	6,479,030	9,314	989,984	13,625	15,977,330
\$10,000,000 under \$25,000,000	3,147	2,160,685	3,132	4,037,766	1,318	642,155	1,835	7,886,131
\$25,000,000 under \$50,000,000	1,234	1,877,881	1,226	3,597,412	497	578,514	737	8,114,687
\$50,000,000 under \$100,000,000	682	2,077,620	678	3,733,505	276	593,007	407	7,162,928
\$100,000,000 or more	639	13,436,970	635	21,699,495	265	2,767,781	374	20,703,338
<b>Operating foundations</b>								
<b>Total</b>	<b>N/A</b>	<b>N/A</b>	<b>6,935</b>	<b>6,634,914</b>	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>
Zero or unreported	N/A	N/A	* 206	* 8,568	N/A	N/A	N/A	N/A
\$1 under \$100,000	N/A	N/A	3,070	88,248	N/A	N/A	N/A	N/A
\$100,000 under \$1,000,000	N/A	N/A	1,769	974,843	N/A	N/A	N/A	N/A
\$1,000,000 under \$10,000,000	N/A	N/A	1,405	856,643	N/A	N/A	N/A	N/A
\$10,000,000 under \$25,000,000	N/A	N/A	256	1,627,949	N/A	N/A	N/A	N/A
\$25,000,000 under \$50,000,000	N/A	N/A	106	878,574	N/A	N/A	N/A	N/A
\$50,000,000 under \$100,000,000	N/A	N/A	57	624,024	N/A	N/A	N/A	N/A
\$100,000,000 or more	N/A	N/A	66	1,576,065	N/A	N/A	N/A	N/A
<b>Grantmaking foundations</b>								
<b>Total</b>	<b>72,617</b>	<b>23,195,428</b>	<b>77,316</b>	<b>47,539,995</b>	<b>23,363</b>	<b>5,655,880</b>	<b>49,787</b>	<b>69,941,231</b>
Zero or unreported	* 413	* 1,258	823	99,968	0	0	720	432,207
\$1 under \$100,000	14,492	29,216	16,642	1,442,986	2,286	4,196	12,411	5,275,393
\$100,000 under \$1,000,000	30,100	592,245	31,156	2,199,462	9,958	151,998	20,156	5,877,967
\$1,000,000 under \$10,000,000	22,023	3,150,976	22,838	7,000,204	8,815	958,879	13,208	15,669,272
\$10,000,000 under \$25,000,000	3,080	2,133,001	3,207	5,231,313	1,285	633,113	1,801	7,726,019
\$25,000,000 under \$50,000,000	1,204	1,855,862	1,262	4,246,973	486	572,774	717	7,381,822
\$50,000,000 under \$100,000,000	672	2,058,280	709	4,267,732	270	582,122	403	7,083,697
\$100,000,000 or more	632	13,374,591	677	23,051,357	263	2,752,798	369	20,494,854

Footnotes at end of table.

# Domestic Private Foundations and Related Excise Taxes, Tax Year 2009

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**Table 1. Domestic Private Foundations: Number and Selected Financial Data, by Type of Foundation and Size of End-of-year Fair Market Value of Total Assets, Tax Year 2009—Continued**

[All figures are estimates based on a sample—money amounts are in thousands of dollars]

Type of foundation, asset size	Distributable amount		Qualifying distributions		Undistributed income for 2009		Excess distributions carryover to 2010	
	Number of returns	Amount	Number of returns	Amount	Number of returns	Amount	Number of returns	Amount
	(52)	(53)	(54)	(55)	(56)	(57)	(58)	(59)
<b>Grantmaking-nonoperating foundations</b>								
<b>Total</b>	<b>72,617</b>	<b>23,195,428</b>	<b>73,299</b>	<b>42,978,569</b>	<b>23,363</b>	<b>5,655,880</b>	<b>49,787</b>	<b>69,941,231</b>
Zero or unreported	* 413	* 1,258	720	96,341	0	0	720	432,207
\$1 under \$100,000	14,492	29,216	14,698	1,390,638	2,286	4,196	12,411	5,275,393
\$100,000 under \$1,000,000	30,100	592,245	30,207	2,136,711	9,958	151,998	20,156	5,877,967
\$1,000,000 under \$10,000,000	22,023	3,150,976	22,074	6,427,557	8,815	958,879	13,208	15,669,272
\$10,000,000 under \$25,000,000	3,080	2,133,001	3,090	3,988,753	1,285	633,113	1,801	7,726,019
\$25,000,000 under \$50,000,000	1,204	1,855,862	1,206	3,522,688	486	572,774	717	7,381,822
\$50,000,000 under \$100,000,000	672	2,058,280	672	3,723,857	270	582,122	403	7,083,697
\$100,000,000 or more	632	13,374,591	632	21,692,024	263	2,752,798	369	20,494,854
<b>Grantmaking-operating foundations</b>								
<b>Total</b>	<b>N/A</b>	<b>N/A</b>	<b>4,017</b>	<b>4,561,426</b>	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>
Zero or unreported	N/A	N/A	* 103	* 3,627	N/A	N/A	N/A	N/A
\$1 under \$100,000	N/A	N/A	1,945	52,348	N/A	N/A	N/A	N/A
\$100,000 under \$1,000,000	N/A	N/A	950	62,751	N/A	N/A	N/A	N/A
\$1,000,000 under \$10,000,000	N/A	N/A	764	572,647	N/A	N/A	N/A	N/A
\$10,000,000 under \$25,000,000	N/A	N/A	117	1,242,560	N/A	N/A	N/A	N/A
\$25,000,000 under \$50,000,000	N/A	N/A	56	724,285	N/A	N/A	N/A	N/A
\$50,000,000 under \$100,000,000	N/A	N/A	37	543,876	N/A	N/A	N/A	N/A
\$100,000,000 or more	N/A	N/A	45	1,359,333	N/A	N/A	N/A	N/A

N/A—Not applicable.

\* Estimate should be used with caution because of the small number of sample returns on which it is based.

[1] The data shown in columns 18 and 19 are based on the amount of contributions, gifts, and grants that foundations actually disbursed for charitable purposes for 2009 using the cash receipts and disbursements method of accounting. These amounts differ somewhat from those reported as contributions, gifts, and grants paid shown in the income statement of Table 3, because foundations may use either the cash receipts and disbursements or the accrual method of accounting.

[2] The Bill and Melinda Gates Foundation reported "other investments," valued at \$33.4 billion for both book and fair market. This amount represented the foundation's interest in the Bill and Melinda Gates Foundation Trust. These assets were also reported by the Bill and Melinda Gates Foundation Trust on its Form 990-PF. For statistical purposes, the data shown in columns 23, 25, 35, and 37 were reduced by \$33.4 billion to avoid overstating these joint assets. For additional information, see <http://www.gatesfoundation.org/annualreport/2010/Documents/2010-annual-report-ceo-letter-english.pdf>.

[3] Less than \$500.

NOTE: Detail may not add to totals because of rounding.

## Domestic Private Foundations and Related Excise Taxes, Tax Year 2009

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**Table 2. Domestic Section 4947(a)(1) Charitable Trusts Treated as Foundations: Number and Selected Financial Data, by Type of Charitable Trust and Size of End-of-year Fair Market Value of Total Assets, Tax Year 2009**

[All figures are estimates based on a sample—money amounts are in thousands of dollars]

Type of trust, asset size	Number of returns	Total revenue		Selected sources of revenue			
				Contributions, gifts, and grants received		Dividends and interest from securities	
		Number of returns	Amount	Number of returns	Amount	Number of returns	Amount
(1)	(2)	(3)	(4)	(5)	(6)	(7)	
<b>All charitable trusts</b>							
<b>Total</b>	<b>6,044</b>	<b>6,014</b>	<b>276,041</b>	<b>238</b>	<b>241,551</b>	<b>5,840</b>	<b>202,360</b>
Zero or unreported	102	98	-226	8	1,897	80	390
\$1 under \$100,000	1,211	1,192	2,190	69	2,226	1,108	1,553
\$100,000 under \$500,000	2,322	2,319	3,145	54	5,767	2,278	15,398
\$500,000 under \$1,000,000	955	954	12,555	33	8,973	940	17,441
\$1,000,000 under \$10,000,000	1,326	1,324	54,394	62	44,432	1,310	90,356
\$10,000,000 or more	128	127	203,982	12	178,256	124	77,222
<b>Nonoperating charitable trusts</b>							
<b>Total</b>	<b>6,013</b>	<b>5,983</b>	<b>272,778</b>	<b>232</b>	<b>240,185</b>	<b>5,816</b>	<b>201,829</b>
Zero or unreported	102	98	-226	8	1,897	80	390
\$1 under \$100,000	1,202	1,183	2,078	66	2,129	1,104	1,548
\$100,000 under \$500,000	2,312	2,309	2,977	53	5,766	2,269	15,354
\$500,000 under \$1,000,000	949	948	12,026	32	8,525	935	17,371
\$1,000,000 under \$10,000,000	1,322	1,320	53,850	61	43,613	1,306	90,066
\$10,000,000 or more	126	125	202,074	12	178,256	122	77,101
<b>Operating charitable trusts</b>							
<b>Total</b>	<b>31</b>	<b>31</b>	<b>3,262</b>	<b>6</b>	<b>1,366</b>	<b>24</b>	<b>531</b>
Zero or unreported	0	0	0	0	0	0	0
\$1 under \$100,000	9	9	112	3	97	4	5
\$100,000 under \$500,000	10	10	169	1	1	9	44
\$500,000 under \$1,000,000	6	6	529	1	448	5	70
\$1,000,000 under \$10,000,000	4	4	544	1	820	4	290
\$10,000,000 or more	2	2	1,909	0	0	2	121
<b>Grantmaking charitable trusts</b>							
<b>Total</b>	<b>5,831</b>	<b>5,815</b>	<b>161,837</b>	<b>214</b>	<b>135,536</b>	<b>5,664</b>	<b>194,948</b>
Zero or unreported	98	95	-231	6	1,895	80	390
\$1 under \$100,000	1,114	1,104	2,069	62	2,123	1,032	1,485
\$100,000 under \$500,000	2,256	2,255	1,994	46	4,978	2,220	15,135
\$500,000 under \$1,000,000	937	936	11,485	31	7,912	922	17,165
\$1,000,000 under \$10,000,000	1,303	1,302	50,468	59	41,723	1,290	89,324
\$10,000,000 or more	123	123	96,053	10	76,904	120	71,449

Footnotes at end of table.

## Domestic Private Foundations and Related Excise Taxes, Tax Year 2009

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**Table 2. Domestic Section 4947(a)(1) Charitable Trusts Treated as Foundations: Number and Selected Financial Data, by Type of Charitable Trust and Size of End-of-year Fair Market Value of Total Assets, Tax Year 2009—Continued**

[All figures are estimates based on a sample—money amounts are in thousands of dollars]

Type of trust, asset size	Number of returns	Total revenue		Selected sources of revenue			
				Contributions, gifts, and grants received		Dividends and interest from securities	
		Number of returns	Amount	Number of returns	Amount	Number of returns	Amount
(1)	(2)	(3)	(4)	(5)	(6)	(7)	
<b>Grantmaking-nonoperating charitable trusts</b>							
<b>Total</b>	<b>5,807</b>	<b>5,791</b>	<b>160,070</b>	<b>209</b>	<b>134,265</b>	<b>5,646</b>	<b>194,541</b>
Zero or unreported	98	95	-231	6	1,895	80	390
\$1 under \$100,000	1,106	1,096	2,058	60	2,121	1,028	1,479
\$100,000 under \$500,000	2,249	2,248	1,959	45	4,977	2,214	15,106
\$500,000 under \$1,000,000	932	931	10,962	30	7,464	918	17,111
\$1,000,000 under \$10,000,000	1,300	1,299	49,934	58	40,904	1,287	89,062
\$10,000,000 or more	122	122	95,388	10	76,904	119	71,393
<b>Grantmaking-operating charitable trusts</b>							
<b>Total</b>	<b>24</b>	<b>24</b>	<b>1,767</b>	<b>5</b>	<b>1,271</b>	<b>18</b>	<b>406</b>
Zero or unreported	0	0	0	0	0	0	0
\$1 under \$100,000	8	8	10	2	2	4	5
\$100,000 under \$500,000	7	7	35	1	1	6	30
\$500,000 under \$1,000,000	5	5	523	1	448	4	54
\$1,000,000 under \$10,000,000	3	3	533	1	820	3	262
\$10,000,000 or more	1	1	665	0	0	1	55

Footnotes at end of table.

# Domestic Private Foundations and Related Excise Taxes, Tax Year 2009

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**Table 2. Domestic Section 4947(a)(1) Charitable Trusts Treated as Foundations: Number and Selected Financial Data, by Type of Charitable Trust and Size of End-of-year Fair Market Value of Total Assets, Tax Year 2009—Continued**

[All figures are estimates based on a sample—money amounts are in thousands of dollars]

Type of trust, asset size	Selected sources of revenue—continued		Total expenses		Excess of revenue (less loss) over expenses		Net investment income	
	Net gain (less loss) from sales of assets							
	Number of returns	Amount	Number of returns	Amount	Number of returns	Amount	Number of returns	Amount
	(8)	(9)	(10)	(11)	(12)	(13)	(14)	(15)
<b>All charitable trusts</b>								
<b>Total</b>	<b>5,449</b>	<b>-219,873</b>	<b>6,027</b>	<b>555,165</b>	<b>6,013</b>	<b>-279,124</b>	<b>5,733</b>	<b>266,703</b>
Zero or unreported	72	-2,538	100	23,119	96	-23,344	48	374
\$1 under \$100,000	935	-1,878	1,202	8,074	1,194	-5,883	1,060	1,537
\$100,000 under \$500,000	2,150	-19,475	2,318	38,318	2,317	-35,172	2,254	13,736
\$500,000 under \$1,000,000	902	-21,284	955	40,657	954	-28,102	943	16,714
\$1,000,000 under \$10,000,000	1,267	-100,950	1,325	203,559	1,325	-149,166	1,304	105,086
\$10,000,000 or more	123	-73,749	127	241,439	127	-37,457	124	129,256
<b>Nonoperating charitable trusts</b>								
<b>Total</b>	<b>5,430</b>	<b>-219,314</b>	<b>5,997</b>	<b>552,162</b>	<b>5,984</b>	<b>-279,383</b>	<b>5,707</b>	<b>266,143</b>
Zero or unreported	72	-2,538	100	23,119	96	-23,344	48	374
\$1 under \$100,000	933	-1,878	1,193	8,043	1,185	-5,965	1,053	1,533
\$100,000 under \$500,000	2,143	-19,590	2,309	38,217	2,309	-35,241	2,245	13,582
\$500,000 under \$1,000,000	897	-21,154	949	40,424	948	-28,398	937	16,526
\$1,000,000 under \$10,000,000	1,263	-100,409	1,321	203,011	1,321	-149,161	1,300	104,872
\$10,000,000 or more	122	-73,746	125	239,347	125	-37,274	124	129,256
<b>Operating charitable trusts</b>								
<b>Total</b>	<b>19</b>	<b>-558</b>	<b>30</b>	<b>3,003</b>	<b>29</b>	<b>259</b>	<b>26</b>	<b>560</b>
Zero or unreported	0	0	0	0	0	0	0	0
\$1 under \$100,000	2	[2]	9	30	9	82	7	4
\$100,000 under \$500,000	7	115	9	100	8	68	9	154
\$500,000 under \$1,000,000	5	-130	6	232	6	297	6	188
\$1,000,000 under \$10,000,000	4	-540	4	548	4	-4	4	214
\$10,000,000 or more	1	-3	2	2,092	2	-183	0	0
<b>Grantmaking charitable trusts</b>								
<b>Total</b>	<b>5,322</b>	<b>-218,455</b>	<b>5,830</b>	<b>551,240</b>	<b>5,812</b>	<b>-389,403</b>	<b>5,581</b>	<b>258,754</b>
Zero or unreported	72	-2,538	97	22,909	95	-23,141	48	374
\$1 under \$100,000	886	-1,805	1,114	7,921	1,103	-5,853	999	1,489
\$100,000 under \$500,000	2,108	-19,433	2,256	38,029	2,253	-36,035	2,202	13,344
\$500,000 under \$1,000,000	884	-21,004	937	40,460	936	-28,975	926	16,434
\$1,000,000 under \$10,000,000	1,252	-100,301	1,303	201,971	1,302	-151,503	1,285	103,518
\$10,000,000 or more	120	-73,373	123	239,949	123	-143,896	121	123,594

Footnotes at end of table.

## Domestic Private Foundations and Related Excise Taxes, Tax Year 2009

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**Table 2. Domestic Section 4947(a)(1) Charitable Trusts Treated as Foundations: Number and Selected Financial Data, by Type of Charitable Trust and Size of End-of-year Fair Market Value of Total Assets, Tax Year 2009—Continued**

[All figures are estimates based on a sample—money amounts are in thousands of dollars]

Type of trust, asset size	Selected sources of revenue—continued		Total expenses		Excess of revenue (less loss) over expenses		Net investment income	
	Net gain (less loss) from sales of assets				Number of returns			
	(8)	(9)	(10)	(11)	(12)	(13)	(14)	(15)
<b>Grantmaking-nonoperating charitable trusts</b>								
<b>Total</b>	<b>5,309</b>	<b>-217,808</b>	<b>5,806</b>	<b>549,519</b>	<b>5,790</b>	<b>-389,449</b>	<b>5,561</b>	<b>258,358</b>
Zero or unreported	72	-2,538	97	22,909	95	-23,141	48	374
\$1 under \$100,000	884	-1,806	1,106	7,906	1,095	-5,848	993	1,485
\$100,000 under \$500,000	2,104	-19,428	2,249	37,942	2,248	-35,983	2,196	13,313
\$500,000 under \$1,000,000	880	-20,885	932	40,267	931	-29,305	921	16,262
\$1,000,000 under \$10,000,000	1,249	-99,779	1,300	201,503	1,299	-151,569	1,282	103,331
\$10,000,000 or more	120	-73,373	122	238,991	122	-143,603	121	123,594
<b>Grantmaking-operating charitable trusts</b>								
<b>Total</b>	<b>13</b>	<b>-647</b>	<b>24</b>	<b>1,721</b>	<b>22</b>	<b>46</b>	<b>20</b>	<b>396</b>
Zero or unreported	0	0	0	0	0	0	0	0
\$1 under \$100,000	2	[2]	8	15	8	-5	6	4
\$100,000 under \$500,000	4	-4	7	87	5	-52	6	31
\$500,000 under \$1,000,000	4	-120	5	193	5	330	5	173
\$1,000,000 under \$10,000,000	3	-523	3	467	3	66	3	187
\$10,000,000 or more	0	0	1	957	1	-292	0	0

Footnotes at end of table.

## Domestic Private Foundations and Related Excise Taxes, Tax Year 2009

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**Table 2. Domestic Section 4947(a)(1) Charitable Trusts Treated as Foundations: Number and Selected Financial Data, by Type of Charitable Trust and Size of End-of-year Fair Market Value of Total Assets, Tax Year 2009—Continued**

[All figures are estimates based on a sample—money amounts are in thousands of dollars]

Type of trust, asset size	Disbursements for exempt purposes		Contributions, gifts, and grants paid [1]		Excise tax on net investment income		Total assets (book value)	
	Number of returns	Amount	Number of returns	Amount	Number of returns	Amount	Number of returns	Amount
	(16)	(17)	(18)	(19)	(20)	(21)	(22)	(23)
<b>All charitable trusts</b>								
<b>Total</b>	<b>5,982</b>	<b>448,546</b>	<b>5,831</b>	<b>419,614</b>	<b>5,662</b>	<b>4,196</b>	<b>5,942</b>	<b>7,635,916</b>
Zero or unreported	98	22,696	98	22,509	41	4	0	0
\$1 under \$100,000	1,183	7,328	1,114	6,701	1,022	22	1,211	60,191
\$100,000 under \$500,000	2,305	32,191	2,256	28,865	2,242	201	2,322	586,781
\$500,000 under \$1,000,000	952	34,377	937	30,876	935	251	955	662,562
\$1,000,000 under \$10,000,000	1,318	174,110	1,303	162,126	1,298	1,622	1,326	3,425,762
\$10,000,000 or more	126	177,843	123	168,538	124	2,097	128	2,900,620
<b>Nonoperating charitable trusts</b>								
<b>Total</b>	<b>5,954</b>	<b>446,529</b>	<b>5,807</b>	<b>418,966</b>	<b>5,638</b>	<b>4,189</b>	<b>5,911</b>	<b>7,612,334</b>
Zero or unreported	98	22,696	98	22,509	41	4	0	0
\$1 under \$100,000	1,175	7,316	1,106	6,692	1,016	22	1,202	59,730
\$100,000 under \$500,000	2,297	32,116	2,249	28,793	2,233	199	2,312	584,948
\$500,000 under \$1,000,000	946	34,181	932	30,724	930	248	949	658,384
\$1,000,000 under \$10,000,000	1,314	173,610	1,300	161,748	1,294	1,619	1,322	3,414,469
\$10,000,000 or more	124	176,610	122	168,501	124	2,097	126	2,894,802
<b>Operating charitable trusts</b>								
<b>Total</b>	<b>28</b>	<b>2,017</b>	<b>24</b>	<b>648</b>	<b>24</b>	<b>8</b>	<b>31</b>	<b>23,582</b>
Zero or unreported	0	0	0	0	0	0	0	0
\$1 under \$100,000	8	13	8	10	6	[2]	9	461
\$100,000 under \$500,000	8	75	7	72	9	2	10	1,833
\$500,000 under \$1,000,000	6	197	5	152	5	3	6	4,177
\$1,000,000 under \$10,000,000	4	500	3	378	4	2	4	11,293
\$10,000,000 or more	2	1,233	1	37	0	0	2	5,818
<b>Grantmaking charitable trusts</b>								
<b>Total</b>	<b>5,831</b>	<b>447,309</b>	<b>5,831</b>	<b>419,614</b>	<b>5,522</b>	<b>4,065</b>	<b>5,733</b>	<b>7,414,790</b>
Zero or unreported	98	22,696	98	22,509	41	4	0	0
\$1 under \$100,000	1,114	7,268	1,114	6,701	970	21	1,114	56,587
\$100,000 under \$500,000	2,256	32,104	2,256	28,865	2,192	195	2,256	571,969
\$500,000 under \$1,000,000	937	34,288	937	30,876	919	246	937	651,888
\$1,000,000 under \$10,000,000	1,303	173,932	1,303	162,126	1,279	1,591	1,303	3,371,150
\$10,000,000 or more	123	177,021	123	168,538	121	2,009	123	2,763,196

Footnotes at end of table.

## Domestic Private Foundations and Related Excise Taxes, Tax Year 2009

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**Table 2. Domestic Section 4947(a)(1) Charitable Trusts Treated as Foundations: Number and Selected Financial Data, by Type of Charitable Trust and Size of End-of-year Fair Market Value of Total Assets, Tax Year 2009—Continued**

[All figures are estimates based on a sample—money amounts are in thousands of dollars]

Type of trust, asset size	Disbursements for exempt purposes		Contributions, gifts, and grants paid [1]		Excise tax on net investment income		Total assets (book value)	
	Number of returns	Amount	Number of returns	Amount	Number of returns	Amount	Number of returns	Amount
	(16)	(17)	(18)	(19)	(20)	(21)	(22)	(23)
<b>Grantmaking-nonoperating charitable trusts</b>								
<b>Total</b>	<b>5,807</b>	<b>446,204</b>	<b>5,807</b>	<b>418,966</b>	<b>5,504</b>	<b>4,060</b>	<b>5,709</b>	<b>7,398,137</b>
Zero or unreported	98	22,696	98	22,509	41	4	0	0
\$1 under \$100,000	1,106	7,256	1,106	6,692	965	21	1,106	56,221
\$100,000 under \$500,000	2,249	32,031	2,249	28,793	2,186	194	2,249	570,813
\$500,000 under \$1,000,000	932	34,129	932	30,724	915	243	932	648,491
\$1,000,000 under \$10,000,000	1,300	173,511	1,300	161,748	1,276	1,589	1,300	3,361,159
\$10,000,000 or more	122	176,580	122	168,501	121	2,009	122	2,761,453
<b>Grantmaking-operating charitable trusts</b>								
<b>Total</b>	<b>24</b>	<b>1,105</b>	<b>24</b>	<b>648</b>	<b>18</b>	<b>5</b>	<b>24</b>	<b>16,653</b>
Zero or unreported	0	0	0	0	0	0	0	0
\$1 under \$100,000	8	13	8	10	5	[2]	8	365
\$100,000 under \$500,000	7	73	7	72	6	[2]	7	1,156
\$500,000 under \$1,000,000	5	159	5	152	4	3	5	3,397
\$1,000,000 under \$10,000,000	3	421	3	378	3	2	3	9,991
\$10,000,000 or more	1	441	1	37	0	0	1	1,744

Footnotes at end of table.

# Domestic Private Foundations and Related Excise Taxes, Tax Year 2009

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**Table 2. Domestic Section 4947(a)(1) Charitable Trusts Treated as Foundations: Number and Selected Financial Data, by Type of Charitable Trust and Size of End-of-year Fair Market Value of Total Assets, Tax Year 2009—Continued**

[All figures are estimates based on a sample—money amounts are in thousands of dollars]

Type of trust, asset size	Total investment assets (book value)		Investments in securities (book value)			
			Total		Government obligations	
	Number of returns	Amount	Number of returns	Amount	Number of returns	Amount
	(24)	(25)	(26)	(27)	(28)	(29)
<b>All charitable trusts</b>						
<b>Total</b>	<b>5,879</b>	<b>7,492,613</b>	<b>5,397</b>	<b>6,056,412</b>	<b>1,253</b>	<b>382,205</b>
Zero or unreported	0	0	0	0	0	0
\$1 under \$100,000	1,167	58,181	945	41,941	161	3,477
\$100,000 under \$500,000	2,312	577,103	2,170	480,140	401	25,812
\$500,000 under \$1,000,000	950	651,585	902	545,168	230	35,058
\$1,000,000 under \$10,000,000	1,322	3,362,693	1,262	2,779,371	400	187,011
\$10,000,000 or more	128	2,843,050	118	2,209,792	61	130,846
<b>Nonoperating charitable trusts</b>						
<b>Total</b>	<b>5,849</b>	<b>7,472,198</b>	<b>5,376</b>	<b>6,045,237</b>	<b>1,247</b>	<b>380,507</b>
Zero or unreported	0	0	0	0	0	0
\$1 under \$100,000	1,159	57,816	942	41,822	160	3,461
\$100,000 under \$500,000	2,302	575,307	2,162	478,901	399	25,717
\$500,000 under \$1,000,000	944	647,416	897	542,464	228	34,631
\$1,000,000 under \$10,000,000	1,318	3,351,400	1,259	2,773,823	400	187,011
\$10,000,000 or more	126	2,840,258	116	2,208,226	60	129,687
<b>Operating charitable trusts</b>						
<b>Total</b>	<b>30</b>	<b>20,415</b>	<b>21</b>	<b>11,175</b>	<b>6</b>	<b>1,698</b>
Zero or unreported	0	0	0	0	0	0
\$1 under \$100,000	8	365	3	118	1	17
\$100,000 under \$500,000	10	1,796	8	1,239	2	95
\$500,000 under \$1,000,000	6	4,169	5	2,704	2	428
\$1,000,000 under \$10,000,000	4	11,293	3	5,548	0	0
\$10,000,000 or more	2	2,792	2	1,566	1	1,158
<b>Grantmaking charitable trusts</b>						
<b>Total</b>	<b>5,689</b>	<b>7,287,943</b>	<b>5,266</b>	<b>5,897,990</b>	<b>1,222</b>	<b>376,198</b>
Zero or unreported	0	0	0	0	0	0
\$1 under \$100,000	1,085	54,961	897	40,053	152	3,250
\$100,000 under \$500,000	2,249	565,023	2,125	471,831	393	25,404
\$500,000 under \$1,000,000	932	641,255	885	536,964	222	33,988
\$1,000,000 under \$10,000,000	1,300	3,313,649	1,245	2,751,780	396	185,618
\$10,000,000 or more	123	2,713,055	114	2,097,363	59	127,938

Footnotes at end of table.

# Domestic Private Foundations and Related Excise Taxes, Tax Year 2009

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**Table 2. Domestic Section 4947(a)(1) Charitable Trusts Treated as Foundations: Number and Selected Financial Data, by Type of Charitable Trust and Size of End-of-year Fair Market Value of Total Assets, Tax Year 2009—Continued**

[All figures are estimates based on a sample—money amounts are in thousands of dollars]

Type of trust, asset size	Total investment assets (book value)		Investments in securities (book value)			
			Total		Government obligations	
	Number of returns	Amount	Number of returns	Amount	Number of returns	Amount
	(24)	(25)	(26)	(27)	(28)	(29)
<b>Grantmaking-nonoperating charitable trusts</b>						
<b>Total</b>	<b>5,665</b>	<b>7,272,804</b>	<b>5,250</b>	<b>5,890,686</b>	<b>1,218</b>	<b>376,061</b>
Zero or unreported	0	0	0	0	0	0
\$1 under \$100,000	1,077	54,596	894	39,935	151	3,233
\$100,000 under \$500,000	2,242	563,887	2,119	470,991	391	25,308
\$500,000 under \$1,000,000	927	637,866	881	535,030	221	33,963
\$1,000,000 under \$10,000,000	1,297	3,303,658	1,243	2,747,391	396	185,618
\$10,000,000 or more	122	2,712,796	113	2,097,340	59	127,938
<b>Grantmaking-operating charitable trusts</b>						
<b>Total</b>	<b>24</b>	<b>15,139</b>	<b>16</b>	<b>7,304</b>	<b>4</b>	<b>137</b>
Zero or unreported	0	0	0	0	0	0
\$1 under \$100,000	8	365	3	118	1	17
\$100,000 under \$500,000	7	1,136	6	840	2	95
\$500,000 under \$1,000,000	5	3,389	4	1,934	1	25
\$1,000,000 under \$10,000,000	3	9,991	2	4,389	0	0
\$10,000,000 or more	1	259	1	23	0	0

Footnotes at end of table.

# Domestic Private Foundations and Related Excise Taxes, Tax Year 2009

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**Table 2. Domestic Section 4947(a)(1) Charitable Trusts Treated as Foundations: Number and Selected Financial Data, by Type of Charitable Trust and Size of End-of-year Fair Market Value of Total Assets, Tax Year 2009—Continued**

[All figures are estimates based on a sample—money amounts are in thousands of dollars]

Type of trust, asset size	Investments in securities (book value)—continued				Total assets (fair market value)	
	Corporate stock		Corporate bonds			
	Number of returns	Amount	Number of returns	Amount	Number of returns	Amount
	(30)	(31)	(32)	(33)	(34)	(35)
<b>All charitable trusts</b>						
<b>Total</b>	<b>5,230</b>	<b>4,498,410</b>	<b>3,266</b>	<b>1,175,797</b>	<b>5,942</b>	<b>8,319,231</b>
Zero or unreported	0	0	0	0	0	0
\$1 under \$100,000	870	28,974	471	9,490	1,211	58,591
\$100,000 under \$500,000	2,113	349,496	1,283	104,832	2,322	594,484
\$500,000 under \$1,000,000	888	399,540	560	110,569	955	680,323
\$1,000,000 under \$10,000,000	1,243	2,058,967	860	533,393	1,326	3,616,094
\$10,000,000 or more	116	1,661,433	92	417,514	128	3,369,738
<b>Nonoperating charitable trusts</b>						
<b>Total</b>	<b>5,210</b>	<b>4,490,264</b>	<b>3,257</b>	<b>1,174,466</b>	<b>5,911</b>	<b>8,278,935</b>
Zero or unreported	0	0	0	0	0	0
\$1 under \$100,000	867	28,887	470	9,475	1,202	58,167
\$100,000 under \$500,000	2,106	348,506	1,281	104,677	2,312	592,694
\$500,000 under \$1,000,000	883	397,715	557	110,119	949	675,363
\$1,000,000 under \$10,000,000	1,240	2,054,110	858	532,702	1,322	3,604,135
\$10,000,000 or more	114	1,661,045	91	417,493	126	3,348,576
<b>Operating charitable trusts</b>						
<b>Total</b>	<b>20</b>	<b>8,146</b>	<b>9</b>	<b>1,331</b>	<b>31</b>	<b>40,296</b>
Zero or unreported	0	0	0	0	0	0
\$1 under \$100,000	3	87	1	15	9	424
\$100,000 under \$500,000	7	990	2	154	10	1,790
\$500,000 under \$1,000,000	5	1,826	3	450	6	4,961
\$1,000,000 under \$10,000,000	3	4,857	2	691	4	11,959
\$10,000,000 or more	2	387	1	20	2	21,162
<b>Grantmaking charitable trusts</b>						
<b>Total</b>	<b>5,110</b>	<b>4,365,932</b>	<b>3,194</b>	<b>1,155,861</b>	<b>5,733</b>	<b>8,001,902</b>
Zero or unreported	0	0	0	0	0	0
\$1 under \$100,000	828	27,699	448	9,105	1,114	55,413
\$100,000 under \$500,000	2,070	343,146	1,259	103,281	2,256	579,272
\$500,000 under \$1,000,000	873	393,752	550	109,224	937	668,377
\$1,000,000 under \$10,000,000	1,227	2,040,451	847	525,710	1,303	3,554,430
\$10,000,000 or more	112	1,560,884	90	408,541	123	3,144,410

Footnotes at end of table.

## Domestic Private Foundations and Related Excise Taxes, Tax Year 2009

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**Table 2. Domestic Section 4947(a)(1) Charitable Trusts Treated as Foundations: Number and Selected Financial Data, by Type of Charitable Trust and Size of End-of-year Fair Market Value of Total Assets, Tax Year 2009—Continued**

[All figures are estimates based on a sample—money amounts are in thousands of dollars]

Type of trust, asset size	Investments in securities (book value)—continued				Total assets (fair market value)	
	Corporate stock		Corporate bonds			
	Number of returns	Amount	Number of returns	Amount	Number of returns	Amount
	(30)	(31)	(32)	(33)	(34)	(35)
<b>Grantmaking-nonoperating charitable trusts</b>						
<b>Total</b>	<b>5,095</b>	<b>4,359,401</b>	<b>3,188</b>	<b>1,155,225</b>	<b>5,709</b>	<b>7,974,777</b>
Zero or unreported	0	0	0	0	0	0
\$1 under \$100,000	825	27,612	447	9,090	1,106	55,085
\$100,000 under \$500,000	2,065	342,422	1,258	103,261	2,249	578,169
\$500,000 under \$1,000,000	869	392,192	548	108,874	932	664,223
\$1,000,000 under \$10,000,000	1,225	2,036,294	846	525,479	1,300	3,543,827
\$10,000,000 or more	111	1,560,881	89	408,521	122	3,133,474
<b>Grantmaking-operating charitable trusts</b>						
<b>Total</b>	<b>15</b>	<b>6,531</b>	<b>6</b>	<b>636</b>	<b>24</b>	<b>27,126</b>
Zero or unreported	0	0	0	0	0	0
\$1 under \$100,000	3	87	1	15	8	328
\$100,000 under \$500,000	5	725	1	20	7	1,103
\$500,000 under \$1,000,000	4	1,560	2	350	5	4,155
\$1,000,000 under \$10,000,000	2	4,158	1	231	3	10,603
\$10,000,000 or more	1	2	1	20	1	10,937

Footnotes at end of table.

## Domestic Private Foundations and Related Excise Taxes, Tax Year 2009

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**Table 2. Domestic Section 4947(a)(1) Charitable Trusts Treated as Foundations: Number and Selected Financial Data, by Type of Charitable Trust and Size of End-of-year Fair Market Value of Total Assets, Tax Year 2009—Continued**

[All figures are estimates based on a sample—money amounts are in thousands of dollars]

Type of trust, asset size	Total investment assets (fair market value)		Investments in securities (fair market value)					
			Total		Government obligations		Corporate stock	
	Number of returns	Amount	Number of returns	Amount	Number of returns	Amount	Number of returns	Amount
	(36)	(37)	(38)	(39)	(40)	(41)	(42)	(43)
<b>All charitable trusts</b>								
<b>Total</b>	<b>5,879</b>	<b>8,126,860</b>	<b>5,397</b>	<b>6,508,339</b>	<b>1,253</b>	<b>398,491</b>	<b>5,230</b>	<b>4,902,010</b>
Zero or unreported	0	0	0	0	0	0	0	0
\$1 under \$100,000	1,167	56,672	945	41,223	161	3,468	870	28,112
\$100,000 under \$500,000	2,312	584,761	2,170	488,216	401	26,384	2,113	354,722
\$500,000 under \$1,000,000	950	668,294	902	559,924	230	36,306	888	410,588
\$1,000,000 under \$10,000,000	1,322	3,526,777	1,262	2,939,186	400	196,762	1,243	2,196,474
\$10,000,000 or more	128	3,290,356	118	2,479,790	61	135,572	116	1,912,113
<b>Nonoperating charitable trusts</b>								
<b>Total</b>	<b>5,849</b>	<b>8,091,746</b>	<b>5,376</b>	<b>6,496,037</b>	<b>1,247</b>	<b>396,749</b>	<b>5,210</b>	<b>4,892,828</b>
Zero or unreported	0	0	0	0	0	0	0	0
\$1 under \$100,000	1,159	56,344	942	41,123	160	3,451	867	28,044
\$100,000 under \$500,000	2,302	583,008	2,162	487,022	399	26,289	2,106	353,775
\$500,000 under \$1,000,000	944	663,342	897	556,436	228	35,870	883	407,987
\$1,000,000 under \$10,000,000	1,318	3,514,818	1,259	2,933,306	400	196,762	1,240	2,191,335
\$10,000,000 or more	126	3,274,235	116	2,478,150	60	134,377	114	1,911,688
<b>Operating charitable trusts</b>								
<b>Total</b>	<b>30</b>	<b>35,114</b>	<b>21</b>	<b>12,302</b>	<b>6</b>	<b>1,742</b>	<b>20</b>	<b>9,182</b>
Zero or unreported	0	0	0	0	0	0	0	0
\$1 under \$100,000	8	328	3	100	1	17	3	69
\$100,000 under \$500,000	10	1,753	8	1,194	2	95	7	947
\$500,000 under \$1,000,000	6	4,953	5	3,487	2	436	5	2,601
\$1,000,000 under \$10,000,000	4	11,959	3	5,880	0	0	3	5,140
\$10,000,000 or more	2	16,121	2	1,641	1	1,195	2	425
<b>Grantmaking charitable trusts</b>								
<b>Total</b>	<b>5,689</b>	<b>7,831,045</b>	<b>5,266</b>	<b>6,307,142</b>	<b>1,222</b>	<b>392,355</b>	<b>5,110</b>	<b>4,727,428</b>
Zero or unreported	0	0	0	0	0	0	0	0
\$1 under \$100,000	1,085	53,882	897	39,795	152	3,253	828	27,291
\$100,000 under \$500,000	2,249	572,392	2,125	479,791	393	25,964	2,070	348,293
\$500,000 under \$1,000,000	932	656,692	885	551,489	222	35,155	873	404,718
\$1,000,000 under \$10,000,000	1,300	3,473,632	1,245	2,911,379	396	195,355	1,227	2,177,883
\$10,000,000 or more	123	3,074,449	114	2,324,689	59	132,628	112	1,769,242

Footnotes at end of table.

## Domestic Private Foundations and Related Excise Taxes, Tax Year 2009

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**Table 2. Domestic Section 4947(a)(1) Charitable Trusts Treated as Foundations: Number and Selected Financial Data, by Type of Charitable Trust and Size of End-of-year Fair Market Value of Total Assets, Tax Year 2009—Continued**

[All figures are estimates based on a sample—money amounts are in thousands of dollars]

Type of trust, asset size	Total investment assets (fair market value)		Investments in securities (fair market value)					
			Total		Government obligations		Corporate stock	
	Number of returns	Amount	Number of returns	Amount	Number of returns	Amount	Number of returns	Amount
(36)	(37)	(38)	(39)	(40)	(41)	(42)	(43)	
<b>Grantmaking-nonoperating charitable trusts</b>								
<b>Total</b>	<b>5,665</b>	<b>7,805,457</b>	<b>5,250</b>	<b>6,298,877</b>	<b>1,218</b>	<b>392,219</b>	<b>5,095</b>	<b>4,719,951</b>
Zero or unreported	0	0	0	0	0	0	0	0
\$1 under \$100,000	1,077	53,554	894	39,694	151	3,236	825	27,223
\$100,000 under \$500,000	2,242	571,309	2,119	479,007	391	25,869	2,065	347,621
\$500,000 under \$1,000,000	927	652,545	881	548,797	221	35,130	869	402,400
\$1,000,000 under \$10,000,000	1,297	3,463,028	1,243	2,906,712	396	195,355	1,225	2,173,466
\$10,000,000 or more	122	3,065,020	113	2,324,667	59	132,628	111	1,769,241
<b>Grantmaking-operating charitable trusts</b>								
<b>Total</b>	<b>24</b>	<b>25,589</b>	<b>16</b>	<b>8,265</b>	<b>4</b>	<b>136</b>	<b>15</b>	<b>7,477</b>
Zero or unreported	0	0	0	0	0	0	0	0
\$1 under \$100,000	8	328	3	100	1	17	3	69
\$100,000 under \$500,000	7	1,083	6	784	2	95	5	672
\$500,000 under \$1,000,000	5	4,147	4	2,692	1	24	4	2,318
\$1,000,000 under \$10,000,000	3	10,603	2	4,666	0	0	2	4,416
\$10,000,000 or more	1	9,428	1	22	0	0	1	1

Footnotes at end of table.

## Domestic Private Foundations and Related Excise Taxes, Tax Year 2009

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**Table 2. Domestic Section 4947(a)(1) Charitable Trusts Treated as Foundations: Number and Selected Financial Data, by Type of Charitable Trust and Size of End-of-year Fair Market Value of Total Assets, Tax Year 2009—Continued**

[All figures are estimates based on a sample—money amounts are in thousands of dollars]

Type of trust, asset size	Investments in securities (fair market value)—continued		Net worth (book value)		Noncharitable-use assets		Minimum investment return	
	Corporate bonds							
	Number of returns	Amount	Number of returns	Amount	Number of returns	Amount	Number of returns	Amount
(44)	(45)	(46)	(47)	(48)	(49)	(50)	(51)	
<b>All charitable trusts</b>								
<b>Total</b>	<b>3,266</b>	<b>1,207,837</b>	<b>5,940</b>	<b>7,622,436</b>	<b>6,023</b>	<b>7,717,886</b>	<b>6,018</b>	<b>382,079</b>
Zero or unreported	0	0	0	0	83	12,114	82	602
\$1 under \$100,000	471	9,643	1,211	59,858	1,210	56,382	1,206	2,818
\$100,000 under \$500,000	1,283	107,110	2,320	585,888	2,322	549,108	2,322	27,427
\$500,000 under \$1,000,000	560	113,030	955	660,210	954	624,371	954	31,196
\$1,000,000 under \$10,000,000	860	545,949	1,326	3,417,912	1,326	3,354,866	1,326	167,302
\$10,000,000 or more	92	432,105	128	2,898,568	128	3,121,045	128	152,733
<b>Nonoperating charitable trusts</b>								
<b>Total</b>	<b>3,257</b>	<b>1,206,459</b>	<b>5,909</b>	<b>7,598,928</b>	<b>5,993</b>	<b>7,684,001</b>	<b>5,988</b>	<b>380,385</b>
Zero or unreported	0	0	0	0	83	12,114	82	602
\$1 under \$100,000	470	9,628	1,202	59,397	1,202	56,065	1,198	2,803
\$100,000 under \$500,000	1,281	106,958	2,310	584,063	2,312	547,214	2,312	27,332
\$500,000 under \$1,000,000	557	112,579	949	656,037	948	620,292	948	30,992
\$1,000,000 under \$10,000,000	858	545,210	1,322	3,406,624	1,322	3,344,521	1,322	166,784
\$10,000,000 or more	91	432,085	126	2,892,807	126	3,103,795	126	151,871
<b>Operating charitable trusts</b>								
<b>Total</b>	<b>9</b>	<b>1,378</b>	<b>31</b>	<b>23,507</b>	<b>30</b>	<b>33,885</b>	<b>30</b>	<b>1,694</b>
Zero or unreported	0	0	0	0	0	0	0	0
\$1 under \$100,000	1	15	9	461	8	317	8	16
\$100,000 under \$500,000	2	152	10	1,825	10	1,894	10	95
\$500,000 under \$1,000,000	3	451	6	4,173	6	4,079	6	204
\$1,000,000 under \$10,000,000	2	740	4	11,287	4	10,345	4	517
\$10,000,000 or more	1	20	2	5,761	2	17,250	2	862
<b>Grantmaking charitable trusts</b>								
<b>Total</b>	<b>3,194</b>	<b>1,187,360</b>	<b>5,731</b>	<b>7,402,477</b>	<b>5,815</b>	<b>7,424,185</b>	<b>5,813</b>	<b>369,404</b>
Zero or unreported	0	0	0	0	83	12,114	82	602
\$1 under \$100,000	448	9,250	1,114	56,317	1,114	53,660	1,113	2,682
\$100,000 under \$500,000	1,259	105,534	2,254	571,144	2,256	535,562	2,256	26,754
\$500,000 under \$1,000,000	550	111,616	937	649,537	936	613,790	936	30,675
\$1,000,000 under \$10,000,000	847	538,142	1,303	3,364,334	1,303	3,310,256	1,303	165,283
\$10,000,000 or more	90	422,818	123	2,761,144	123	2,898,803	123	143,407

Footnotes at end of table.

## Domestic Private Foundations and Related Excise Taxes, Tax Year 2009

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**Table 2. Domestic Section 4947(a)(1) Charitable Trusts Treated as Foundations: Number and Selected Financial Data, by Type of Charitable Trust and Size of End-of-year Fair Market Value of Total Assets, Tax Year 2009—Continued**

[All figures are estimates based on a sample—money amounts are in thousands of dollars]

Type of trust, asset size	Investments in securities (fair market value)—continued		Net worth (book value)		Noncharitable-use assets		Minimum investment return	
	Corporate bonds							
	Number of returns	Amount	Number of returns	Amount	Number of returns	Amount	Number of returns	Amount
(44)	(45)	(46)	(47)	(48)	(49)	(50)	(51)	
<b>Grantmaking-nonoperating charitable trusts</b>								
<b>Total</b>	<b>3,188</b>	<b>1,186,707</b>	<b>5,707</b>	<b>7,385,899</b>	<b>5,791</b>	<b>7,402,770</b>	<b>5,789</b>	<b>368,333</b>
Zero or unreported	0	0	0	0	83	12,114	82	602
\$1 under \$100,000	447	9,235	1,106	55,952	1,106	53,344	1,105	2,667
\$100,000 under \$500,000	1,258	105,516	2,247	569,996	2,249	534,481	2,249	26,700
\$500,000 under \$1,000,000	548	111,266	932	646,144	931	610,480	931	30,509
\$1,000,000 under \$10,000,000	846	537,891	1,300	3,354,348	1,300	3,301,211	1,300	164,831
\$10,000,000 or more	89	422,798	122	2,759,458	122	2,891,141	122	143,024
<b>Grantmaking-operating charitable trusts</b>								
<b>Total</b>	<b>6</b>	<b>652</b>	<b>24</b>	<b>16,578</b>	<b>24</b>	<b>21,415</b>	<b>24</b>	<b>1,071</b>
Zero or unreported	0	0	0	0	0	0	0	0
\$1 under \$100,000	1	15	8	365	8	317	8	16
\$100,000 under \$500,000	1	17	7	1,148	7	1,081	7	54
\$500,000 under \$1,000,000	2	350	5	3,393	5	3,309	5	165
\$1,000,000 under \$10,000,000	1	250	3	9,986	3	9,045	3	452
\$10,000,000 or more	1	20	1	1,686	1	7,663	1	383

Footnotes at end of table.

## Domestic Private Foundations and Related Excise Taxes, Tax Year 2009

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**Table 2. Domestic Section 4947(a)(1) Charitable Trusts Treated as Foundations: Number and Selected Financial Data, by Type of Charitable Trust and Size of End-of-year Fair Market Value of Total Assets, Tax Year 2009—Continued**

[All figures are estimates based on a sample—money amounts are in thousands of dollars]

Type of trust, asset size	Distributable amount		Qualifying distributions		Undistributed income for 2009		Excess distributions carryover to 2010	
	Number of returns	Amount	Number of returns	Amount	Number of returns	Amount	Number of returns	Amount
	(52)	(53)	(54)	(55)	(56)	(57)	(58)	(59)
<b>All charitable trusts</b>								
<b>Total</b>	<b>5,983</b>	<b>376,909</b>	<b>5,983</b>	<b>450,709</b>	<b>3,778</b>	<b>116,791</b>	<b>2,224</b>	<b>336,794</b>
Zero or unreported	82	599	98	22,696	3	40	95	32,617
\$1 under \$100,000	1,198	2,795	1,183	7,383	663	1,007	537	27,122
\$100,000 under \$500,000	2,311	27,260	2,305	32,502	1,568	10,480	741	39,054
\$500,000 under \$1,000,000	946	30,869	952	34,408	643	12,054	306	21,308
\$1,000,000 under \$10,000,000	1,321	166,255	1,319	175,632	836	57,920	484	73,303
\$10,000,000 or more	125	149,131	126	178,089	65	35,290	61	143,390
<b>Nonoperating charitable trusts</b>								
<b>Total</b>	<b>5,983</b>	<b>376,909</b>	<b>5,955</b>	<b>448,689</b>	<b>3,778</b>	<b>116,791</b>	<b>2,224</b>	<b>336,794</b>
Zero or unreported	82	599	98	22,696	3	40	95	32,617
\$1 under \$100,000	1,198	2,795	1,175	7,370	663	1,007	537	27,122
\$100,000 under \$500,000	2,311	27,260	2,297	32,427	1,568	10,480	741	39,054
\$500,000 under \$1,000,000	946	30,869	946	34,208	643	12,054	306	21,308
\$1,000,000 under \$10,000,000	1,321	166,255	1,315	175,132	836	57,920	484	73,303
\$10,000,000 or more	125	149,131	124	176,856	65	35,290	61	143,390
<b>Operating charitable trusts</b>								
<b>Total</b>	<b>N/A</b>	<b>N/A</b>	<b>28</b>	<b>2,020</b>	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>
Zero or unreported	N/A	N/A	0	0	N/A	N/A	N/A	N/A
\$1 under \$100,000	N/A	N/A	8	13	N/A	N/A	N/A	N/A
\$100,000 under \$500,000	N/A	N/A	8	75	N/A	N/A	N/A	N/A
\$500,000 under \$1,000,000	N/A	N/A	6	200	N/A	N/A	N/A	N/A
\$1,000,000 under \$10,000,000	N/A	N/A	4	500	N/A	N/A	N/A	N/A
\$10,000,000 or more	N/A	N/A	2	1,233	N/A	N/A	N/A	N/A
<b>Grantmaking charitable trusts</b>								
<b>Total</b>	<b>5,785</b>	<b>364,963</b>	<b>5,831</b>	<b>448,989</b>	<b>3,657</b>	<b>105,924</b>	<b>2,146</b>	<b>331,217</b>
Zero or unreported	82	599	98	22,696	3	40	95	32,617
\$1 under \$100,000	1,105	2,659	1,114	7,321	615	938	491	24,942
\$100,000 under \$500,000	2,249	26,593	2,256	32,130	1,526	10,099	721	36,477
\$500,000 under \$1,000,000	929	30,391	937	34,301	633	11,822	299	20,590
\$1,000,000 under \$10,000,000	1,299	164,324	1,303	175,274	819	56,461	479	73,200
\$10,000,000 or more	121	140,397	123	177,267	61	26,564	61	143,390

Footnotes at end of table.

# Domestic Private Foundations and Related Excise Taxes, Tax Year 2009

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**Table 2. Domestic Section 4947(a)(1) Charitable Trusts Treated as Foundations: Number and Selected Financial Data, by Type of Charitable Trust and Size of End-of-year Fair Market Value of Total Assets, Tax Year 2009—Continued**

[All figures are estimates based on a sample—money amounts are in thousands of dollars]

Type of trust, asset size	Distributable amount		Qualifying distributions		Undistributed income for 2009		Excess distributions carryover to 2010	
	Number of returns	Amount	Number of returns	Amount	Number of returns	Amount	Number of returns	Amount
	(52)	(53)	(54)	(55)	(56)	(57)	(58)	(59)
<b>Grantmaking-nonoperating charitable trusts</b>								
<b>Total</b>	<b>5,785</b>	<b>364,963</b>	<b>5,807</b>	<b>447,880</b>	<b>3,657</b>	<b>105,924</b>	<b>2,146</b>	<b>331,217</b>
Zero or unreported	82	599	98	22,696	3	40	95	32,617
\$1 under \$100,000	1,105	2,659	1,106	7,308	615	938	491	24,942
\$100,000 under \$500,000	2,249	26,593	2,249	32,058	1,526	10,099	721	36,477
\$500,000 under \$1,000,000	929	30,391	932	34,138	633	11,822	299	20,590
\$1,000,000 under \$10,000,000	1,299	164,324	1,300	174,853	819	56,461	479	73,200
\$10,000,000 or more	121	140,397	122	176,826	61	26,564	61	143,390
<b>Grantmaking-operating charitable trusts</b>								
<b>Total</b>	<b>N/A</b>	<b>N/A</b>	<b>24</b>	<b>1,109</b>	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>
Zero or unreported	N/A	N/A	0	0	N/A	N/A	N/A	N/A
\$1 under \$100,000	N/A	N/A	8	13	N/A	N/A	N/A	N/A
\$100,000 under \$500,000	N/A	N/A	7	73	N/A	N/A	N/A	N/A
\$500,000 under \$1,000,000	N/A	N/A	5	162	N/A	N/A	N/A	N/A
\$1,000,000 under \$10,000,000	N/A	N/A	3	421	N/A	N/A	N/A	N/A
\$10,000,000 or more	N/A	N/A	1	441	N/A	N/A	N/A	N/A

N/A—Not applicable.

[1] The data shown in columns 18 and 19 are based on the amount of contributions, gifts, and grants that charitable trusts actually disbursed for charitable purposes for 2009 using the cash receipts and disbursements method of accounting. These amounts differ somewhat from those reported as contributions, gifts, and grants paid shown in the income statement of Table 4, because charitable trusts may use either the cash receipts and disbursements or the accrual method of accounting.

[2] Less than \$500.

NOTE: Detail may not add to totals because of rounding.

# Domestic Private Foundations and Related Excise Taxes, Tax Year 2009

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**Table 3. Domestic Private Foundations: Income Statements and Balance Sheets, by Size of End-of-year Fair Market Value of Total Assets, Tax Year 2009**

[All figures are estimates based on a sample—money amounts are in thousands of dollars]

Item	Total	Asset size			
		Assets zero or unreported	\$1 under \$100,000	\$100,000 under \$1,000,000	\$1,000,000 under \$10,000,000
	(1)	(2)	(3)	(4)	(5)
<b>Number of returns</b>	<b>92,624</b>	<b>1,244</b>	<b>25,562</b>	<b>35,077</b>	<b>24,520</b>
<b>Total revenue</b>	<b>52,179,124</b>	<b>65,993</b>	<b>1,449,584</b>	<b>2,708,381</b>	<b>6,840,794</b>
Contributions, gifts, and grants received	42,380,197	67,947	1,408,387	2,535,912	5,849,505
Interest on savings and temporary cash investments	1,380,509	* 836	5,130	55,630	212,371
Dividends and interest from securities	9,029,813	* 495	10,604	275,200	1,536,171
Gross rents and royalties	703,827	0	* 2,992	53,074	82,521
Net gain (less loss) from sales of assets	-5,556,396	* -3,371	-44,093	-370,068	-1,588,872
Gross profit (less loss) from business activities	134,178	0	* 421	* 862	7,807
Other income	4,106,995	* 86	66,141	157,770	741,290
<b>Total expenses</b>	<b>56,184,890</b>	<b>108,573</b>	<b>1,765,282</b>	<b>3,514,107</b>	<b>8,424,076</b>
Contributions, gifts, and grants paid [1]	43,200,568	99,122	1,348,928	2,076,790	6,278,718
Compensation of officers	1,120,220	0	63,780	86,998	282,289
Other salaries and wages	2,222,870	* 76	38,738	87,526	517,162
Pension plans and employee benefits	672,011	* 144	* 7,737	18,099	76,872
Legal fees	227,003	* 941	17,452	22,675	64,316
Accounting fees	288,469	1,417	28,508	46,978	91,932
Other professional fees	2,530,328	* 2,468	41,385	118,633	313,755
Interest	281,765	0	558	5,900	28,272
Taxes	699,851	* 853	3,700	21,778	97,391
Depreciation and depletion	513,980	0	8,740	13,561	67,633
Occupancy	517,428	* 372	17,785	30,471	109,956
Travel, conferences, and meetings	355,835	* 438	31,988	41,734	66,667
Printing and publications	73,116	* 623	2,564	7,524	9,346
Other expenses	3,481,445	2,119	153,418	935,440	419,766
<b>Excess of revenue (less loss) over expenses</b>	<b>-4,005,766</b>	<b>-42,580</b>	<b>-315,699</b>	<b>-805,726</b>	<b>-1,583,282</b>
Excess of revenue	26,102,285	* 10	136,315	630,838	3,667,851
Loss	-30,108,051	-42,590	-452,014	-1,436,565	-5,251,133
<b>Total assets (fair market value) [2]</b>	<b>588,534,809</b>	<b>0</b>	<b>764,584</b>	<b>14,793,296</b>	<b>77,041,243</b>
Cash (non-interest bearing accounts)	7,653,838	0	127,092	986,569	2,460,697
Savings and temporary cash investments [3]	45,838,484	0	230,177	2,641,444	8,766,011
Accounts receivable, net	1,342,066	0	9,615	57,406	213,874
Pledges receivable, net	1,270,069	0	0	* 5,366	126,680
Grants receivable	624,769	0	* 15	* 116,484	58,103
Receivables due from disqualified persons	64,928	0	* 2,209	5,267	14,492
Other notes and loans receivable	3,409,631	0	10,788	157,560	763,631
Inventories	503,611	0	* 605	* 12,538	188,812
Prepaid expenses and deferred charges	364,401	0	* 641	8,463	42,059
Investments, total (noncash) [2] [3]	494,010,442	0	340,980	10,441,416	61,155,068
Securities, total	324,672,693	0	277,126	8,837,374	50,072,055
Government obligations	35,414,535	0	15,720	528,449	3,417,177
Corporate stock	243,423,270	0	225,587	7,053,107	39,178,561
Corporate bonds	45,834,888	0	35,819	1,255,818	7,476,317
Land, buildings, and equipment (less accumulated depreciation)	10,396,277	0	1,300	178,700	1,317,620
Mortgage loans	804,728	0	* 90	* 44,648	260,600
Other investments [2]	158,136,744	0	62,464	1,380,694	9,504,793
Charitable-purpose land, buildings, and equipment (less accumulated depreciation)	14,229,592	0	33,731	242,546	2,431,539
Other assets	19,222,978	0	8,733	118,235	820,277
<b>Total assets (book value) [2]</b>	<b>550,893,728</b>	<b>0</b>	<b>960,239</b>	<b>14,513,181</b>	<b>72,278,063</b>
Cash (non-interest bearing accounts)	7,663,586	0	127,093	986,672	2,462,113
Savings and temporary cash investments [3]	45,827,663	0	248,283	2,640,361	8,754,748

Footnotes at end of table.

# Domestic Private Foundations and Related Excise Taxes, Tax Year 2009

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**Table 3. Domestic Private Foundations: Income Statements and Balance Sheets, by Size of End-of-year Fair Market Value of Total Assets, Tax Year 2009—Continued**

[All figures are estimates based on a sample—money amounts are in thousands of dollars]

Item	Total	Asset size			
		Assets zero or unreported	\$1 under \$100,000	\$100,000 under \$1,000,000	\$1,000,000 under \$10,000,000
	(1)	(2)	(3)	(4)	(5)
Accounts receivable, net	1,342,762	0	9,615	57,471	214,157
Pledges receivable, net	1,270,069	0	0	* 5,366	126,680
Grants receivable	640,195	0	* 54	* 111,743	57,700
Receivables due from disqualified persons	64,920	0	2,209	5,261	14,490
Other notes and loans receivable	3,465,771	0	12,363	169,543	783,601
Inventories	491,045	0	* 605	* 13,270	187,453
Prepaid expenses and deferred charges	365,509	0	* 641	8,463	42,186
Investments, total (noncash) [2] [3]	459,315,486	0	514,505	10,195,511	56,788,033
Securities, total	302,869,455	0	339,649	8,568,837	46,318,095
Government obligations	34,968,228	0	16,094	511,817	3,300,542
Corporate stock	222,734,464	0	288,546	6,821,523	35,659,620
Corporate bonds	45,166,763	0	35,008	1,235,497	7,357,932
Land, buildings, and equipment (less accumulated depreciation)	7,273,386	0	1,203	160,233	1,045,027
Mortgage loans	867,872	0	* 90	* 67,500	262,699
Other investments [2]	148,304,773	0	173,563	1,398,941	9,162,212
Charitable-purpose land, buildings, and equipment (less accumulated depreciation)	12,641,342	0	35,615	236,334	2,012,924
Other assets	17,805,379	0	9,257	83,184	833,978
<b>Total liabilities (book value)</b>	<b>27,552,272</b>	<b>* 529</b>	<b>314,534</b>	<b>251,294</b>	<b>1,506,179</b>
<b>Net worth (book value) [2]</b>	<b>523,341,455</b>	<b>* -529</b>	<b>645,705</b>	<b>14,261,887</b>	<b>70,771,883</b>
<b>Total assets, beginning-of-year (book value) [2]</b>	<b>522,009,642</b>	<b>64,429</b>	<b>1,191,667</b>	<b>15,280,078</b>	<b>72,564,243</b>
Cash (non-interest bearing accounts)	8,398,077	13,426	192,392	1,022,613	2,405,372
Savings and temporary cash investments [3]	47,924,878	* 2,847	303,468	2,860,381	9,796,800
Accounts receivable, net	1,197,169	0	20,228	57,205	166,652
Pledges receivable, net	988,177	0	0	* 25,555	130,543
Grants receivable	748,906	* 4,318	* 54	105,942	97,798
Receivables due from disqualified persons	67,394	0	2,963	4,609	42,530
Other notes and loans receivable	3,441,477	0	11,681	148,647	667,449
Inventories	412,510	0	* 746	* 12,428	189,483
Prepaid expenses and deferred charges	357,810	* 238	* 2,715	2,489	45,535
Investments, total (noncash) [2] [3]	430,053,293	* 23,094	588,953	10,717,666	56,488,420
Securities, total	294,220,594	* 22,373	455,747	8,826,498	45,816,211
Government obligations	32,586,021	0	16,530	641,074	3,491,376
Corporate stock	222,544,187	* 14,803	371,074	7,003,050	35,643,872
Corporate bonds	39,090,386	* 7,569	68,143	1,182,375	6,680,962
Land, buildings, and equipment (less accumulated depreciation)	7,167,700	* 694	3,270	140,345	1,078,485
Mortgage loans	1,035,794	0	* 129	* 75,084	289,139
Other investments [2]	127,629,205	* 27	129,808	1,675,738	9,304,585
Charitable-purpose land, buildings, and equipment (less accumulated depreciation)	11,995,084	* 20,506	43,790	230,750	1,892,605
Other assets	16,424,866	0	24,677	91,794	641,057
<b>Total liabilities, beginning-of-year (book value)</b>	<b>27,629,516</b>	<b>* 1,689</b>	<b>231,690</b>	<b>266,263</b>	<b>1,443,072</b>
<b>Net worth, beginning-of-year (book value) [2]</b>	<b>494,380,126</b>	<b>62,741</b>	<b>959,977</b>	<b>15,013,815</b>	<b>71,121,171</b>

Footnotes at end of table.

## Domestic Private Foundations and Related Excise Taxes, Tax Year 2009

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**Table 3. Domestic Private Foundations: Income Statements and Balance Sheets, by Size of End-of-year Fair Market Value of Total Assets, Tax Year 2009—Continued**

[All figures are estimates based on a sample—money amounts are in thousands of dollars]

Item	Asset size—continued			
	\$10,000,000 under \$25,000,000	\$25,000,000 under \$50,000,000	\$50,000,000 under \$100,000,000	\$100,000,000 or more
	(6)	(7)	(8)	(9)
<b>Number of returns</b>	3,429	1,347	740	705
<b>Total revenue</b>	<b>5,993,532</b>	<b>4,187,036</b>	<b>3,599,795</b>	<b>27,334,010</b>
Contributions, gifts, and grants received	5,018,182	3,563,740	2,954,343	20,982,179
Interest on savings and temporary cash investments	130,827	94,343	97,406	783,966
Dividends and interest from securities	985,992	832,271	886,989	4,502,092
Gross rents and royalties	67,849	50,342	64,387	382,661
Net gain (less loss) from sales of assets	-649,870	-840,796	-734,093	-1,325,233
Gross profit (less loss) from business activities	10,978	43,884	3,657	66,568
Other income	429,574	443,251	327,105	1,941,778
<b>Total expenses</b>	<b>6,224,874</b>	<b>4,861,974</b>	<b>4,652,571</b>	<b>26,633,432</b>
Contributions, gifts, and grants paid [1]	4,793,668	3,764,841	3,686,832	21,151,668
Compensation of officers	155,402	107,677	101,214	322,861
Other salaries and wages	209,879	184,929	182,730	1,001,831
Pension plans and employee benefits	50,035	47,938	41,815	429,371
Legal fees	22,539	18,183	19,257	61,640
Accounting fees	33,424	23,777	19,835	42,598
Other professional fees	225,745	230,293	179,497	1,418,551
Interest	22,928	23,175	19,419	181,513
Taxes	70,297	57,911	55,920	392,001
Depreciation and depletion	48,237	56,340	45,087	274,382
Occupancy	47,748	54,575	38,440	218,082
Travel, conferences, and meetings	35,585	16,533	19,522	143,367
Printing and publications	5,256	4,600	6,047	37,155
Other expenses	504,130	271,203	236,957	958,412
<b>Excess of revenue (less loss) over expenses</b>	<b>-231,342</b>	<b>-674,938</b>	<b>-1,052,777</b>	<b>700,578</b>
Excess of revenue	2,788,055	2,079,944	1,930,772	14,868,501
Loss	-3,019,396	-2,754,882	-2,983,548	-14,167,923
<b>Total assets (fair market value) [2]</b>	<b>52,995,438</b>	<b>46,588,702</b>	<b>51,199,867</b>	<b>345,151,679</b>
Cash (non-interest bearing accounts)	1,125,933	782,781	630,765	1,540,001
Savings and temporary cash investments [3]	5,333,124	3,944,448	4,512,988	20,410,292
Accounts receivable, net	110,281	100,573	238,716	611,602
Pledges receivable, net	85,748	140,943	247,249	664,083
Grants receivable	82,580	90,396	116,309	160,883
Receivables due from disqualified persons	17,053	* 25,443	* 271	* 194
Other notes and loans receivable	464,504	445,864	282,963	1,284,322
Inventories	117,822	70,896	89,913	23,025
Prepaid expenses and deferred charges	20,884	36,986	32,580	222,787
Investments, total (noncash) [2] [3]	43,022,731	38,196,138	43,033,748	297,820,361
Securities, total	33,464,300	27,641,179	30,231,451	174,149,208
Government obligations	2,870,515	2,346,927	2,908,591	23,327,156
Corporate stock	25,044,774	20,945,166	22,783,044	128,193,032
Corporate bonds	5,549,011	4,349,086	4,539,816	22,629,020
Land, buildings, and equipment (less accumulated depreciation)	1,091,348	798,993	1,316,689	5,691,627
Mortgage loans	150,870	91,884	115,398	141,237
Other investments [2]	8,316,214	9,664,081	11,370,209	117,838,289
Charitable-purpose land, buildings, and equipment (less accumulated depreciation)	1,884,897	1,962,538	1,301,567	6,372,773
Other assets	729,881	791,695	712,798	16,041,357
<b>Total assets (book value) [2]</b>	<b>48,886,322</b>	<b>42,949,965</b>	<b>47,566,969</b>	<b>323,738,988</b>
Cash (non-interest bearing accounts)	1,134,241	781,908	630,440	1,541,120
Savings and temporary cash investments [3]	5,327,161	3,937,539	4,520,042	20,399,529

Footnotes at end of table.

# Domestic Private Foundations and Related Excise Taxes, Tax Year 2009

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**Table 3. Domestic Private Foundations: Income Statements and Balance Sheets, by Size of End-of-year Fair Market Value of Total Assets, Tax Year 2009—Continued**

[All figures are estimates based on a sample—money amounts are in thousands of dollars]

Item	Asset size—continued			
	\$10,000,000 under \$25,000,000	\$25,000,000 under \$50,000,000	\$50,000,000 under \$100,000,000	\$100,000,000 or more
	(6)	(7)	(8)	(9)
Accounts receivable, net	110,381	100,896	238,641	611,602
Pledges receivable, net	85,748	140,943	247,249	664,083
Grants receivable	105,688	88,984	116,309	159,717
Receivables due from disqualified persons	17,052	* 25,443	* 271	* 194
Other notes and loans receivable	464,705	458,686	283,522	1,293,352
Inventories	117,785	65,160	87,745	19,027
Prepaid expenses and deferred charges	21,377	36,989	32,624	223,228
Investments, total (noncash) [2] [3]	39,250,323	34,920,736	39,723,834	277,922,545
Securities, total	30,430,199	25,321,379	27,909,515	163,981,781
Government obligations	2,792,858	2,285,019	2,849,801	23,212,096
Corporate stock	22,220,903	18,748,639	20,603,100	118,392,133
Corporate bonds	5,416,439	4,287,721	4,456,614	22,377,551
Land, buildings, and equipment (less accumulated depreciation)	745,308	501,192	877,669	3,942,754
Mortgage loans	158,350	93,003	146,291	139,940
Other investments [2]	7,916,465	9,005,162	10,790,360	109,858,070
Charitable-purpose land, buildings, and equipment (less accumulated depreciation)	1,607,308	1,683,556	1,073,942	5,991,663
Other assets	644,555	709,125	612,352	14,912,928
<b>Total liabilities (book value)</b>	<b>1,141,959</b>	<b>1,359,165</b>	<b>1,455,525</b>	<b>21,523,087</b>
<b>Net worth (book value) [2]</b>	<b>47,744,363</b>	<b>41,590,800</b>	<b>46,111,445</b>	<b>302,215,901</b>
<b>Total assets, beginning-of-year (book value) [2]</b>	<b>48,142,334</b>	<b>41,664,078</b>	<b>46,324,324</b>	<b>296,779,488</b>
Cash (non-interest bearing accounts)	1,054,745	807,750	873,530	2,028,248
Savings and temporary cash investments [3]	6,176,214	4,520,615	5,293,335	18,971,218
Accounts receivable, net	100,960	112,492	261,609	478,024
Pledges receivable, net	70,475	149,658	176,266	435,680
Grants receivable	67,036	112,614	230,226	130,918
Receivables due from disqualified persons	14,167	* 2,874	* [4]	* 248
Other notes and loans receivable	416,250	405,785	242,746	1,548,920
Inventories	57,077	61,884	76,840	14,051
Prepaid expenses and deferred charges	24,407	24,923	33,613	223,892
Investments, total (noncash) [2] [3]	38,101,142	33,325,398	37,500,690	253,307,932
Securities, total	29,171,419	24,464,004	27,157,684	158,306,658
Government obligations	2,973,906	2,556,486	2,880,214	20,026,436
Corporate stock	21,456,248	18,285,987	20,366,642	119,402,512
Corporate bonds	4,741,266	3,621,532	3,910,828	18,877,711
Land, buildings, and equipment (less accumulated depreciation)	694,089	443,304	820,845	3,986,670
Mortgage loans	182,100	82,294	174,186	232,861
Other investments [2]	8,053,534	8,335,795	9,347,975	90,781,743
Charitable-purpose land, buildings, and equipment (less accumulated depreciation)	1,440,677	1,519,773	969,793	5,877,191
Other assets	619,185	620,313	665,674	13,762,166
<b>Total liabilities, beginning-of-year (book value)</b>	<b>1,132,071</b>	<b>1,245,166</b>	<b>1,514,386</b>	<b>21,795,179</b>
<b>Net worth, beginning-of-year (book value) [2]</b>	<b>47,010,264</b>	<b>40,418,912</b>	<b>44,809,938</b>	<b>274,983,308</b>

\* Estimate should be used with caution because of the small number of sample returns on which it is based.

[1] The data in this row are based on the amount of contributions, gifts, and grants paid as reported on the income statement portion of the return and calculated using either the cash receipts and disbursements method of accounting or the accrual method of accounting. These amounts differ somewhat from the contributions, gifts, and grants paid in columns 18 and 19 of Table 1, which are calculated using the cash receipts and disbursements method of accounting only.

[2] The Bill and Melinda Gates Foundation reported end-of-year "other investments," valued at \$33.4 billion for both book and market, and beginning-of-year "other investments," valued at \$29.6 billion. These amounts represented the foundation's interest in the Bill and Melinda Gates Foundation Trust. These assets were also reported by the Bill and Melinda Gates Foundation Trust on its Form 990-PF. For statistical purposes, the data shown for end-of-year "total assets (fair market value)," "investments, total (noncash fair market value)," "other investments (fair market value)," "total assets (book value)," "investments, total (noncash book value)," "other investments (book value)," and "net worth" were reduced by \$33.4 billion to avoid overstating these joint assets. Likewise, data shown for beginning-of-year "total assets (book value)," "investments, total (noncash book value)," "other investments (book value)," and "net worth" were reduced by \$29.6 billion. For additional information, see <http://www.gatesfoundation.org/annualreport/2010/Documents/2010-annual-report-ceo-letter-english.pdf>.

[3] This category is included with investments in Table 1. However, Table 3 shows total noncash investments, to more closely match the Form 990-PF.

[4] Less than \$500.

NOTE: Detail may not add to total because of rounding.

# Domestic Private Foundations and Related Excise Taxes, Tax Year 2009

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**Table 4. Domestic Section 4947(a)(1) Charitable Trusts Treated as Foundations: Income Statements and Balance Sheets, by Size of End-of-year Fair Market Value of Total Assets, Tax Year 2009**

[All figures are estimates based on a sample—money amounts are in thousands of dollars]

Item	Total	Asset size					
		Assets zero or unreported	\$1 under \$100,000	\$100,000 under \$500,000	\$500,000 under \$1,000,000	\$1,000,000 under \$10,000,000	\$10,000,000 or more
		(1)	(2)	(3)	(4)	(5)	(6)
<b>Number of returns</b>	<b>6,044</b>	<b>102</b>	<b>1,211</b>	<b>2,322</b>	<b>955</b>	<b>1,326</b>	<b>128</b>
<b>Total revenue</b>	<b>276,041</b>	<b>-226</b>	<b>2,190</b>	<b>3,145</b>	<b>12,555</b>	<b>54,394</b>	<b>203,982</b>
Contributions, gifts, and grants received	241,551	1,897	2,226	5,767	8,973	44,432	178,256
Interest on savings and temporary cash investments	9,229	11	74	424	475	3,437	4,808
Dividends and interest from securities	202,360	390	1,553	15,398	17,441	90,356	77,222
Gross rents and royalties	9,101	4	11	148	796	5,948	2,193
Net gain (less loss) from sales of assets	-219,873	-2,538	-1,878	-19,475	-21,284	-100,950	-73,749
Gross profit (less loss) from business activities	127	0	0	0	-2	128	0
Other income	33,545	9	204	884	6,154	11,041	15,252
<b>Total expenses</b>	<b>555,165</b>	<b>23,119</b>	<b>8,074</b>	<b>38,318</b>	<b>40,657</b>	<b>203,559</b>	<b>241,439</b>
Contributions, gifts, and grants paid [1]	465,610	22,479	6,599	29,109	30,855	162,734	213,834
Compensation of officers	48,534	190	712	6,242	6,217	24,261	10,911
Other salaries and wages	2,001	0	0	3	10	580	1,409
Pension plans and employee benefits	355	[3]	0	0	0	79	276
Legal fees	2,685	119	122	356	288	1,132	668
Accounting fees	4,831	81	341	1,294	785	1,835	496
Other professional fees	7,721	16	83	402	466	3,280	3,474
Interest	840	[3]	5	2	33	386	413
Taxes	8,720	214	52	462	493	3,457	4,041
Depreciation and depletion	1,032	[3]	4	21	52	690	265
Occupancy	1,291	12	18	30	96	316	819
Travel, conferences, and meetings	407	[3]	11	3	6	95	292
Printing and publications	105	0	2	3	8	29	64
Other expenses	11,033	6	124	392	1,349	4,684	4,478
<b>Excess of revenue (less loss) over expenses</b>	<b>-279,124</b>	<b>-23,344</b>	<b>-5,883</b>	<b>-35,172</b>	<b>-28,102</b>	<b>-149,166</b>	<b>-37,457</b>
Excess of revenue	240,270	0	506	4,394	12,522	60,606	162,243
Loss	-519,395	-23,344	-6,389	-39,566	-40,624	-209,772	-199,700
<b>Total assets (fair market value)</b>	<b>8,319,231</b>	<b>0</b>	<b>58,591</b>	<b>594,484</b>	<b>680,323</b>	<b>3,616,094</b>	<b>3,369,738</b>
Cash (non-interest bearing accounts)	33,867	0	980	4,002	3,749	16,941	8,194
Savings and temporary cash investments [2]	440,914	0	5,554	33,360	36,072	191,609	174,320
Accounts receivable, net	999	0	59	-18	213	615	129
Pledges receivable, net	268	0	0	268	0	0	0
Grants receivable	1,091	0	25	541	0	525	0
Receivables due from disqualified persons	849	0	0	2	841	6	0
Other notes and loans receivable	25,440	0	149	2,072	1,250	11,106	10,863
Inventories	127	0	29	0	0	39	58
Prepaid expenses and deferred charges	1,302	0	5	38	8	1,197	55
Investments, total (noncash) [2]	7,685,946	0	51,118	551,401	632,223	3,335,168	3,116,036
Securities, total	6,508,339	0	41,223	488,216	559,924	2,939,186	2,479,790
Government obligations	398,491	0	3,468	26,384	36,306	196,762	135,572
Corporate stock	4,902,010	0	28,112	354,722	410,588	2,196,474	1,912,113
Corporate bonds	1,207,837	0	9,643	107,110	113,030	545,949	432,105
Land, buildings and equipment (less accumulated depreciation)	223,480	0	311	4,534	12,675	96,229	109,731
Mortgage loans	11,480	0	36	882	486	6,027	4,050
Other investments	942,647	0	9,547	57,770	59,139	293,726	522,465
Charitable-purpose land, buildings, and equipment (less accumulated depreciation)	56,801	0	298	1,085	1,971	33,342	20,105
Other assets	71,627	0	374	1,731	3,997	25,547	39,977
<b>Total assets (book value)</b>	<b>7,635,916</b>	<b>0</b>	<b>60,191</b>	<b>586,781</b>	<b>662,562</b>	<b>3,425,762</b>	<b>2,900,620</b>
Cash (non-interest bearing accounts)	34,076	0	979	3,963	3,748	17,215	8,171
Savings and temporary cash investments [2]	440,896	0	5,548	33,335	36,027	191,360	174,626
Accounts receivable, net	1,059	0	120	-18	213	615	129
Pledges receivable, net	268	0	0	268	0	0	0

Footnotes at end of table.

# Domestic Private Foundations and Related Excise Taxes, Tax Year 2009

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**Table 4. Domestic Section 4947(a)(1) Charitable Trusts Treated as Foundations: Income Statements and Balance Sheets, by Size of End-of-year Fair Market Value of Total Assets, Tax Year 2009—Continued**

[All figures are estimates based on a sample—money amounts are in thousands of dollars]

Item	Total	Asset size					
		Assets zero or unreported	\$1 under \$100,000	\$100,000 under \$500,000	\$500,000 under \$1,000,000	\$1,000,000 under \$10,000,000	\$10,000,000 or more
	(1)	(2)	(3)	(4)	(5)	(6)	(7)
Grants receivable	1,097	0	25	541	0	530	0
Receivables due from disqualified persons	849	0	0	2	841	6	0
Other notes and loans receivable	25,498	0	149	2,119	1,250	11,117	10,863
Inventories	97	0	29	0	0	39	29
Prepaid expenses and deferred charges	1,197	0	5	38	8	1,093	54
Investments, total (noncash) [2]	7,051,717	0	52,633	543,768	615,558	3,171,333	2,668,424
Securities, total	6,056,412	0	41,941	480,140	545,168	2,779,371	2,209,792
Government obligations	382,205	0	3,477	25,812	35,058	187,011	130,846
Corporate stock	4,498,410	0	28,974	349,496	399,540	2,058,967	1,661,433
Corporate bonds	1,175,797	0	9,490	104,832	110,569	533,393	417,514
Land, buildings and equipment (less accumulated depreciation)	73,765	0	432	3,028	7,790	48,304	14,210
Mortgage loans	11,578	0	42	865	486	6,135	4,050
Other investments	909,962	0	10,218	59,734	62,115	337,523	440,372
Charitable-purpose land, buildings, and equipment (less accumulated depreciation)	23,959	0	289	979	1,223	16,298	5,171
Other assets	55,203	0	416	1,785	3,693	16,157	33,153
<b>Total liabilities (book value)</b>	<b>13,480</b>	<b>0</b>	<b>333</b>	<b>893</b>	<b>2,351</b>	<b>7,850</b>	<b>2,052</b>
<b>Net worth (book value)</b>	<b>7,622,436</b>	<b>0</b>	<b>59,858</b>	<b>585,888</b>	<b>660,210</b>	<b>3,417,912</b>	<b>2,898,568</b>
<b>Total assets, beginning-of-year (book value)</b>	<b>7,854,674</b>	<b>34,692</b>	<b>66,348</b>	<b>617,868</b>	<b>689,154</b>	<b>3,554,114</b>	<b>2,892,498</b>
Cash (non-interest bearing accounts)	44,913	174	1,520	3,831	5,213	25,353	8,821
Savings and temporary cash investments [2]	517,715	4,184	6,476	41,270	44,204	249,882	171,699
Accounts receivable, net	2,092	101	118	-21	62	1,649	182
Pledges receivable, net	258	0	23	270	-35	0	0
Grants receivable	445	0	0	445	0	0	0
Receivables due from disqualified persons	778	0	0	0	775	0	3
Other notes and loans receivable	28,635	9,577	247	1,908	770	10,311	5,822
Inventories	13	0	13	0	0	[3]	0
Prepaid expenses and deferred charges	1,291	0	3	8	11	1,207	62
Investments, total (noncash) [2]	7,199,988	20,654	56,907	567,037	631,364	3,232,248	2,691,779
Securities, total	6,163,351	19,494	46,109	495,047	553,140	2,848,328	2,201,233
Government obligations	532,884	1,347	4,472	36,166	42,698	234,329	213,873
Corporate stock	4,566,496	13,097	33,148	366,821	409,216	2,148,355	1,595,858
Corporate bonds	1,063,970	5,049	8,490	92,060	101,226	465,644	391,502
Land, buildings and equipment (less accumulated depreciation)	80,929	355	574	3,184	6,318	55,409	15,089
Mortgage loans	11,524	0	19	701	517	6,480	3,807
Other investments	944,185	805	10,205	68,104	71,390	322,031	471,650
Charitable-purpose land, buildings, and equipment (less accumulated depreciation)	22,536	0	297	771	1,234	14,933	5,301
Other assets	36,010	2	743	2,350	5,557	18,531	8,828
<b>Total liabilities, beginning-of-year (book value)</b>	<b>12,995</b>	<b>23</b>	<b>366</b>	<b>810</b>	<b>3,084</b>	<b>6,719</b>	<b>1,992</b>
<b>Net worth, beginning-of-year (book value)</b>	<b>7,841,679</b>	<b>34,668</b>	<b>65,982</b>	<b>617,058</b>	<b>686,070</b>	<b>3,547,394</b>	<b>2,890,506</b>

[1] The data in this row are based on the amount of contributions, gifts, and grants paid as reported on the income statement portion of the return and calculated using either the cash receipts and disbursements method of accounting or the accrual method of accounting. These amounts differ somewhat from the contributions, gifts, and grants paid in columns 18 and 19 of Table 2, which are calculated using the cash receipts and disbursements method of accounting only.

[2] This category is included with investments in Table 2. However, Table 4 shows total noncash investments, to more closely match the Form 990-PF.

[3] Less than \$500.

NOTE: Detail may not add to total because of rounding.

# Controlled Foreign Corporations, 2008

by Lee Mahony and Randy Miller

For Tax Year 2008, foreign corporations controlled by U.S. multinational corporations held \$14.5 trillion in assets and reported receipts of \$6.0 trillion. These controlled foreign corporations (CFCs) paid \$125.2 billion in foreign income taxes on \$662.0 billion of earnings and profits (E&P) (less deficit) before income taxes. CFC assets and receipts both increased by nearly 25 percent from Tax Year 2006, while E&P (less deficit) and foreign taxes paid increased by nearly 30 percent and 27 percent, respectively.

Almost 79 percent, or 65,740, of CFCs for Tax Year 2008 were concentrated in three major industrial sectors: (1) services; (2) goods production; and (3) distribution and transportation of goods. These three industrial sectors accounted for 81.2 percent of total receipts (\$4.9 trillion), 74.9 percent of E&P (less deficit) before income taxes (\$496.0 billion), and 57.5 percent of income taxes (\$72.0 billion). Foreign corporations in the finance, insurance, real estate, and rental and leasing sector held 46.4 percent of total CFC assets (\$6.7 trillion) while generating only 11.6 percent of total CFC receipts (\$694.7 billion) and 8.5 percent of total CFC E&P (less deficit) before income taxes (\$55.9 billion).

For Tax Year 2008, some 83,642 CFCs were incorporated in 188 different countries.<sup>1</sup> Almost 43 percent, or 35,856, of these CFCs were incorporated in Europe. Nearly 91 percent of these European CFCs were located in European Union countries. Latin American and Asian CFCs represented 13.7 percent and 23.5 percent of all CFCs, respectively.

## Controlled Foreign Corporations

Direct foreign investment by U.S. persons may take several forms, including foreign branches, partnerships, and separate corporations. This article deals with the use of the corporation as a vehicle for direct foreign investment. For U.S. income tax purposes, a foreign corporation is “controlled” if U.S. shareholders own more than

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50 percent of its outstanding voting stock, or more than 50 percent of the value of all its outstanding stock (directly, indirectly, or constructively) on any day during the foreign corporation’s tax year. A “noncontrolled” foreign corporation is any foreign corporation that fails to meet either of the above requirements for control. For purposes of determining control, a U.S. shareholder is defined as a U.S. person who owns 10 percent or more of the foreign corporation’s total combined voting stock.<sup>2</sup> However, for Statistics of Income purposes, a foreign corporation is controlled only if one U.S. corporation satisfies either of the above 50-percent ownership requirements for an uninterrupted period of at least 30 days during the foreign corporation’s tax year.<sup>3</sup> For Tax Year 2008, there were 11,929 U.S. corporations that held such control over 83,642 CFCs. All statistics in this article pertaining to CFCs meet the definition.

In general, the income of a CFC is not taxable to the U.S. shareholders until repatriated in the form of a dividend. Prior to 1962, U.S. taxpayers could defer U.S. tax on such income indefinitely by accumulating this income in a CFC. To address the potential for tax avoidance, Congress enacted the Subpart F provisions of the Internal Revenue Code in 1962.<sup>4</sup> These provisions require certain items of income to be treated as dividends deemed paid to the U.S. shareholders and, therefore, subject to current U.S. taxation. Currently, a U.S. shareholder of a CFC may be required to include in gross income the shareholder’s ratable share of the CFC’s: (1) Subpart F income;<sup>5</sup> (2) earnings invested in U.S. property; (3) previously excluded Subpart F income withdrawn from “qualified investments” in less developed countries; (4) previously excluded export trade income withdrawn from investment in export trade assets; and (5) factoring income (income derived from the acquisition of a trade or service receivable). For Tax Year 2008, CFCs reported a total of \$80.4 billion of Subpart F income.

## CFCs by Industrial Sector

For Tax Year 2008, goods producers accounted for 13.9 percent of end-of-year assets and 36.0 percent of total receipts (see Figure A). These CFCs earned 23.3 percent of the E&P (less deficit) before income taxes for

<sup>1</sup> Based on unpublished data.

<sup>2</sup> The current definition of a Controlled Foreign Corporation is provided in Internal Revenue Code section 957. Ownership attribution rules are provided in section 958.

<sup>3</sup> The statistics in this article pertain only to foreign corporations for which one U.S. corporation satisfies the requirements for control. This is because complete Form 5471 filings are required only for foreign corporations controlled by a single U.S. shareholder (i.e., those shareholders meeting the definition of a “Category of Filer 4” taxpayer per the Form 5471 instructions). Partial filing requirements exist for noncontrolled foreign corporations and for controlled foreign corporations which are not controlled by a single U.S. shareholder. For more details, refer to the instructions for Form 5471.

<sup>4</sup> The prevention of tax avoidance was a primary tax policy objective that led to the enactment of the Subpart F provisions of the Internal Revenue Code. Other policy considerations also contributed to the enactment of Subpart F. For more detailed information on the history of Subpart F, see *The Deferral of Income Earned Through U.S. Controlled Foreign Corporations: A Policy Study*, Office of Tax Policy, Department of the Treasury, December 2000.

<sup>5</sup> See Subpart F income in the Explanation of Selected Terms section of this article.

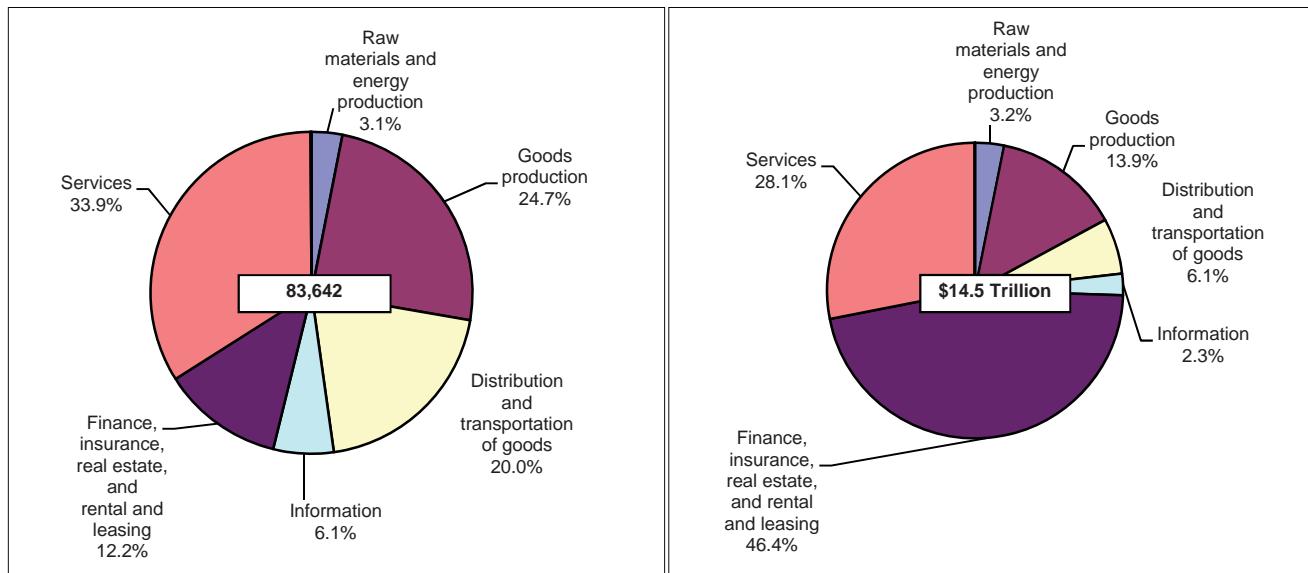
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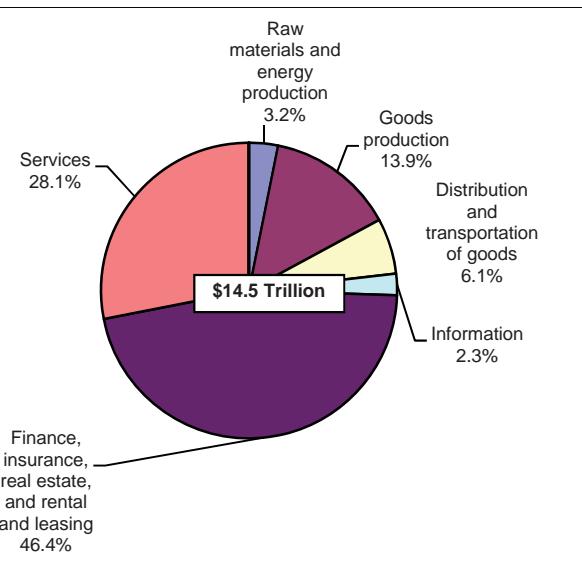
**Figure A**

## U.S. Corporations and Their Controlled Foreign Corporations: Number, End-of-Year Total Assets, and Total Receipts by Industrial Sector of Controlled Foreign Corporation, Tax Year 2008

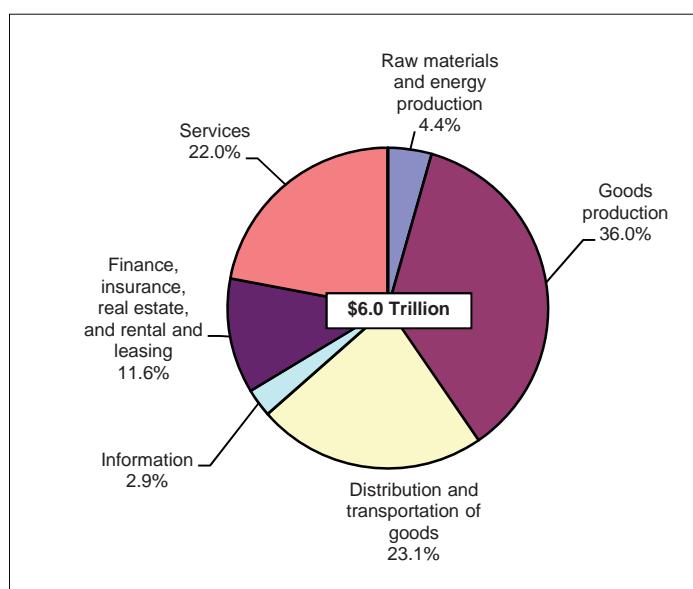
**Number of Foreign Corporations [1]**



**End-of-Year Total Assets [1]**



**Total Receipts [1]**



[1] Includes "Nature of business not allocable," not shown separately.

NOTE: Detail may not add to 100 percent because of rounding.

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all corporate-owned CFCs. Goods producers paid \$28.6 billion of foreign taxes, representing 22.9 percent of all taxes paid by CFCs. Beverage and tobacco, chemical, computer and electronic products, and transportation equipment manufacturers collectively reported 54.1 percent of end-of-year assets, 52.6 percent of total receipts, and 56.4 percent of E&P (less deficit) before income taxes for all CFCs in the goods production sector. Chemical manufacturers alone generated 31.4 percent of the E&P (less deficit) before income taxes and 25.0 percent of the foreign income taxes reported by all goods producers. Pre-tax earnings for chemical manufacturers increased 33.6 percent from Tax Year 2006 to \$48.5 billion. Within the goods production sector, motor vehicle and vehicle parts manufacturers and petroleum and coal product manufacturers experienced significant declines in profitability. Motor vehicle and vehicle parts manufacturers reported an aggregate deficit in E&P before income taxes of \$4.5 billion for Tax Year 2008, after having reported positive earnings of \$5.7 billion for Tax Year 2006. Despite a 40.4-percent increase in total receipts from Tax Year 2006, CFCs engaged in petroleum and coal product manufacturing reported an 83.8-percent decline in earnings and profits (less deficit) before income taxes.

For Tax Year 2008, CFCs engaged in finance, insurance, real estate, and rental and leasing held 46.4 percent of all assets while generating only 11.6 percent of the total receipts and 8.5 percent of the E&P (less deficit) before income taxes reported by all CFCs. The number of CFCs in this sector increased 3.7 percent from Tax Year 2006, while assets and total receipts increased by 18.8 percent and 35.3 percent, respectively. More than \$5.9 trillion, or 88.0 percent, of the assets reported for this industrial sector were attributable to finance corporations. These finance corporations generated 72.5 percent of receipts but only 57.6 percent of the E&P (less deficit) before income taxes for this industrial sector. This discrepancy is primarily due to the \$11.8 billion in losses reported by CFCs engaged in securities, commodity contracts, and other financial investments and related activities. Insurance CFCs reported nearly \$0.6 trillion in assets and over \$0.1 trillion in receipts, representing 8.7 percent and 20.7 percent of the total assets and total receipts for this sector, respectively.

There were more CFCs in the services sector than any other industrial sector. For Tax Year 2008, some 33.9 percent of all CFCs were classified as service corporations. Service providers reported nearly \$4.1 trillion in assets and more than \$1.3 trillion in receipts. However, excluding management and holding companies, CFCs classified in the services sector reported only \$0.7 trillion in assets and \$0.5 trillion in receipts.

Every major industrial sector showed increases in total receipts between Tax Year 2006 and Tax Year 2008. CFCs engaged in services reported a 60.8-percent increase in total receipts, the largest of any major industrial sector. These services CFCs reported an increase in E&P (less deficit) before income taxes of 105.0 percent. Total receipts for CFCs in the information sector increased by 57.2 percent. CFCs in the finance, insurance, real estate, and rental and leasing sector reported an increase in total receipts of 35.3 percent. CFCs in the information sector reported a 160.8-percent increase in E&P (less deficit) before taxes between Tax Year 2006 and Tax Year 2008, the largest increase of any major industrial sector. The finance, insurance, real estate, and rental and leasing sector was the only major industrial sector to show a decrease in E&P (less deficit) before income taxes from Tax Year 2006 to Tax Year 2008. The 40.5-percent decline for this sector was mostly attributable to an \$11.8-billion loss reported by CFCs in the securities, commodity contracts, and other financial investment and related activities subsector.

### Geographic Distribution of CFCs

Figure B shows the geographic distribution of CFCs by major region of incorporation. For Tax Year 2008, Europe remained the most significant region for CFC activity. Europe alone accounted for 62.5 percent of end-of-year assets, 50.5 percent of total receipts, and 49.4 percent of E&P (less deficit) before income taxes for all CFCs. European CFCs paid 43.4 percent of the \$125.2 billion of foreign income taxes reported by all CFCs for Tax Year 2008. Within Europe, most CFC activity was concentrated in European Union (EU) countries. Nearly 91 percent of European CFCs were incorporated in EU countries. These CFCs reported 92.8 percent of ending assets, 86.9 percent of total receipts, and 81.5 percent of E&P (less deficit) before income taxes for all European CFCs. Almost 43 percent of European CFCs not incorporated in EU countries were incorporated in Switzerland. These Swiss CFCs accounted for 77.2 percent of ending assets, 81.4 percent of receipts, and 79.5 percent of E&P (less deficit) before income taxes for non-EU European CFCs.

Other Western Hemisphere countries (which include Canada and Caribbean countries but exclude Central and South America) and Asia also were significant regions of CFC activity. CFCs conducting business in the Other Western Hemisphere countries held 19.2 percent of all CFC end-of-year assets and reported 21.5 percent of all CFC receipts. These CFCs reported 28.0 percent of the E&P (less deficit) before income taxes and paid 27.2 percent of the foreign income taxes paid by all CFCs. Within the Other Western Hemisphere region, Canada was home

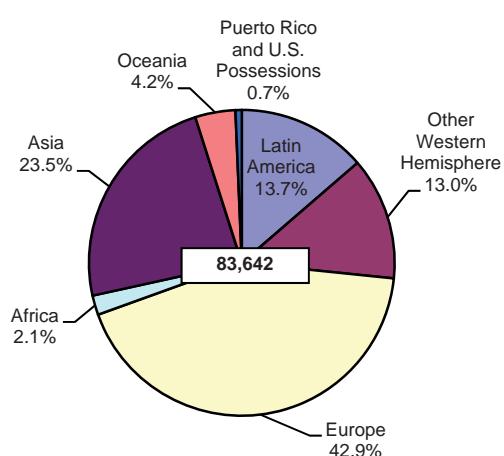
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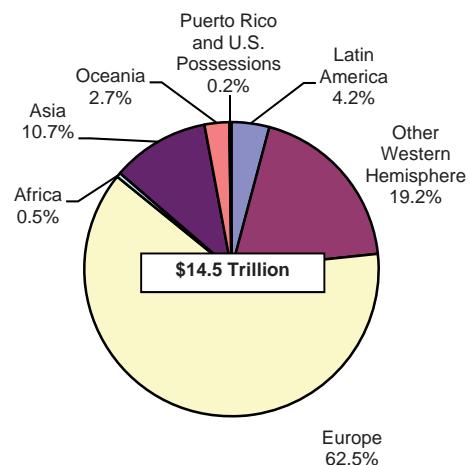
**Figure B**

### U.S. Corporations and Their Controlled Foreign Corporations: Number, End-of-Year Total Assets, Total Receipts, and Earnings and Profits by Geographic Region of Incorporation of Controlled Foreign Corporation, Tax Year 2008

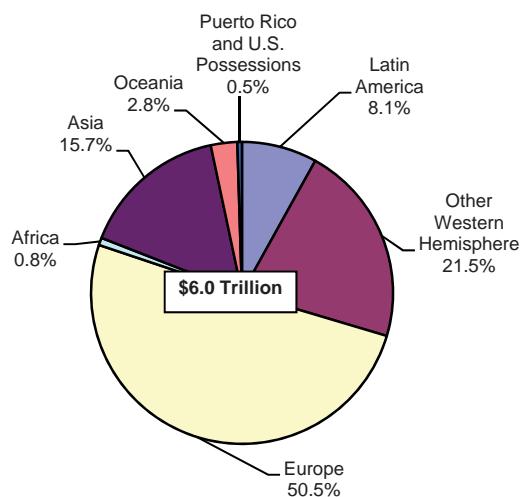
Number of Foreign Corporations



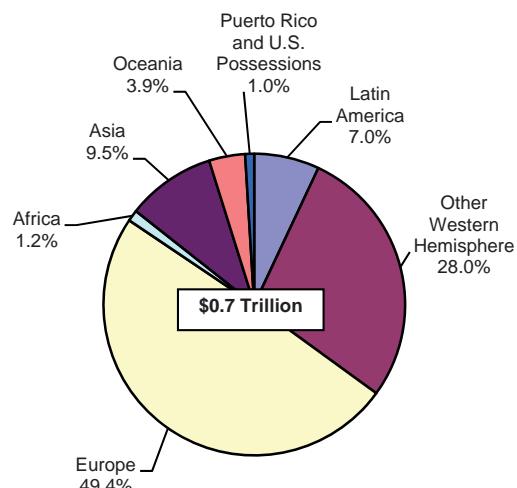
End-of-Year Total Assets



Total Receipts



Earnings and Profits [1]



[1] Less deficits and before income taxes.

NOTE: Detail may not add to 100 percent because of rounding.

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to most CFC activity. Canadian CFCs generated 48.6 percent of the total receipts for this region. Canadian CFCs accounted for 25.7 percent of the E&P (less deficit) before income taxes and 35.5 percent of the foreign income taxes for CFCs in this region. With 6,829 CFCs, Canada had more CFCs than any other country except the United Kingdom (8,707). CFCs in Asia reported 10.7 percent of the ending assets, 15.7 percent of the total receipts, and 9.5 percent of the E&P (less deficit) before income taxes for all CFCs. More activity was reported for CFCs in Japan than any other Asian country. Japanese CFCs accounted for 41.0 percent of the ending assets, 27.6 percent of the total receipts, and 10.0 percent of the E&P (less deficit) before income taxes reported by all Asian CFCs. For Tax Year 2008, there were more CFCs incorporated in China (4,546) than any other Asian country, including Japan (2,730). In fact, for Tax Year 2008, only three countries had more CFCs than China.<sup>6</sup> For Tax Year 2008, Japan (\$260.5 billion) and Singapore (\$136.5 billion) were the only Asian countries that accounted for more CFC receipts than China (\$125.4 billion). The two geographic groupings with the smallest CFC representation were Africa and U.S. Possessions (including Puerto Rico). Only 2.7 percent of all CFCs were incorporated in these two regions. Collectively, they accounted for 0.7 percent of end-of-year assets, 1.3 percent of total receipts, and 2.2 percent of E&P (less deficit) before income taxes for all CFCs. Within Africa, most CFC activity was concentrated in five countries. Egypt, Liberia, Mauritius, Nigeria, and South Africa collectively accounted for 89.6 percent of ending assets, 86.1 percent of the total receipts, and 96.1 percent of the E&P (less deficit) before income taxes for all African CFCs. Nearly 40 percent of African CFCs were incorporated in South Africa alone. South African CFCs reported 17.8 percent of the ending assets, 47.0 percent of the total receipts, and 21.8 percent of the E&P (less deficit) before income taxes reported by all African CFCs. Most CFC activity in the U.S. Possessions is attributable to Puerto Rico. Puerto Rican CFCs held 91.5 percent of ending assets and generated 94.3 percent of the total receipts reported by all CFCs operating in the U.S. Possessions. For Tax Year 2008, the average tax rate for CFCs incorporated in Puerto Rico and U.S. Possessions was 4.3 percent, compared to the average tax rate of 19.1 percent for all other CFCs.<sup>7</sup> CFCs incorporated in African countries again had the highest average tax rate of any region at 36.3 percent.

Between Tax Year 2006 and Tax Year 2008, the number of CFCs increased by only 6.9 percent. However, CFC assets and receipts increased by 24.7 percent and 24.5 percent, respectively. Asia was the only major geographic region to experience a double-digit percentage increase in the number of CFCs between Tax Year 2006 and TY2008. The number of Asian CFCs increased by 17.4 percent during this period. This increase is largely attributable to the 32.7-percent increase in Chinese CFCs. Chinese CFCs reported a 93.0-percent increase in ending assets and a 52.7-percent increase in receipts. Despite this growth, Chinese CFCs reported only 19.7 percent of the ending assets and 48.1 percent of the receipts reported by Japanese CFCs for Tax Year 2008.

## Profitability

For purposes of this article, two measures are used to assess pretax profitability for CFCs: rate of return on assets and profit margin. Rate of return on assets is defined as current E&P (less deficit) before income taxes divided by end-of-year assets. Profit margin is defined as current E&P (less deficit) before income taxes divided by total receipts.

For Tax Year 2008, profitability measures varied among the six different major industrial sectors. CFCs engaged in raw materials and energy production reported both the highest rate of return on assets (18.7 percent) and the highest profit margin (32.6 percent). The high profitability of this sector is attributable to CFCs in the mining, quarrying, and oil and gas extraction subsector. The return on assets and profit margin for this subsector were 21.0 percent and 38.8 percent, respectively. CFCs in the utilities subsector reported a 7.6-percent return on assets and an 11.0-percent profit margin, while CFCs engaged in agriculture, forestry, and fishing reported only a 4.6-percent rate of return on assets and a 4.7-percent profit margin.

CFCs engaged in the distribution and transportation of goods and goods production sectors reported the next highest return on assets percentages (8.3 percent and 7.6 percent, respectively). These CFCs, however, also reported the lowest profit margins of any sector (5.3 percent and 7.1 percent, respectively). CFCs in the finance, insurance, real estate, and rental and leasing sector reported the lowest return on assets (0.8 percent). CFCs in the services sector reported the second highest profit margin (20.3 percent).

<sup>6</sup> The countries with the most CFCs are: United Kingdom (8,707), Canada (6,829), Mexico (4,910), China (4,546), Germany (4,094), France (3,522), Netherlands (3,505), Australia (2,802), Japan (2,730), and Hong Kong (2,368).

<sup>7</sup> See Average tax rate in the Explanation of Selected Terms at the end of this article.

## Distributions of Earnings and Profits

For Tax Year 2008, CFCs distributed \$370.0 billion of E&P to U.S. and foreign shareholders. Nearly 72 percent of distributions of E&P were from not previously taxed E&P (\$264.6 billion), while the remainder was distributed from previously taxed E&P (\$105.4 billion). More than 26 percent of CFC distributions (or \$96.7 billion) represented taxable dividends to the U.S. parent corporation.

The majority of distributions of E&P are attributed to CFCs doing business in the goods production and services sectors. These two industrial sectors distributed \$243.3 billion of E&P or 65.8 percent of total distributions. Of this total, \$177.2 billion were from not previously taxed E&P, with the remaining \$66.1 billion coming from previously taxed E&P. More than 26 percent of the distributions by goods producers were attributable to chemical manufacturers. Manufacturers of computers and electronic products and manufacturers of beverage and tobacco products accounted for an additional 10.4 percent and 9.8 percent of all distributions by CFCs in the goods production sector. CFCs classified as management companies reported 89.0 percent of the distributions to shareholders reported by all services CFCs. CFCs engaged in oil and gas extraction accounted for 78.5 percent of all distributions from the raw materials and energy production sector and 7.3 percent of distributions from all CFCs.

European-based CFCs accounted for 52.2 percent (\$193.2 billion) of all distributions of E&P. Nearly 68.8 percent of these distributions were from not previously

taxed E&P (\$132.8 billion), with the remainder distributed from previously taxed E&P (\$60.4 billion). CFCs incorporated in European Union countries made 88.4 percent of all shareholder distributions by European CFCs. CFCs in the Other Western Hemisphere region distributed \$101.0 billion of E&P in Tax Year 2008 or 27.3 percent of all distributions. Canadian CFCs accounted for 35.0 percent of these distributions; CFCs in Bermuda and the Cayman Islands accounted for 33.3 percent and 16.8 percent, respectively.

Figure C displays taxable payout ratios by industrial sector. The taxable payout ratio is defined as taxable dividends paid to a U.S. person by a CFC with positive current E&P net of current year Subpart F income divided by positive current E&P net of current year Subpart F income (see definitions of U.S. person, Current earnings and profits, and Subpart F income in the Explanation of Selected Terms at the end of this article). For Tax Year 2008, CFCs reported a taxable payout ratio of 10.3 percent, slightly higher than the 9.7-percent ratio for Tax Year 2006. CFCs in the raw materials and energy production sector reported the largest taxable payout ratio (23.1 percent). The services sector reported the next highest taxable payout ratio (14.3 percent).

## CFCs and Foreign Disregarded Entities

A foreign disregarded entity (FDE) is an entity that is created or organized outside the United States and is disregarded as a separate entity from its tax owner for U.S. income tax purposes. The tax owner is treated as owning all the FDE's assets and liabilities. The tax owner

## Figure C

### U.S. Corporations and Their Controlled Foreign Corporations: Number of Foreign Corporations with Positive Current Earnings and Profits Net of Current Year Subpart F Income and Taxable Payout Ratios by Industrial Sector of Controlled Foreign Corporation, Tax Year 2008

[Money amounts are in thousands of dollars]

Industrial sector of Controlled Foreign Corporation	Number of foreign corporations with positive current earnings and profits net of current year Subpart F income	Positive current earnings and profits net of current year Subpart F income [1]	Taxable payout ratio (percentage)
	(1)	(2)	(3)
<b>All industries [2]</b>	<b>45,258</b>	<b>602,988,233</b>	<b>10.3</b>
Raw materials and energy production	1,047	55,109,894	23.1
Goods production	12,183	145,475,005	6.0
Distribution and transportation of goods	9,897	54,586,433	6.2
Information	2,597	2,246,627	2.9
Finance, insurance, real estate, and rental and leasing	4,732	9,967,764	4.3
Services	14,786	225,667,113	14.3

[1] Amounts are multiplied by the total percentage of voting stock owned by the Form 5471 filer at the end of its annual accounting period.

[2] Includes "Nature of business not allocable," not shown separately.

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is typically a U.S. or foreign corporation or partnership. FDEs are created for various international tax planning reasons, including Subpart F and foreign tax credit planning. The statistics presented below pertain only to FDEs with tax owners that are controlled foreign corporations.

For Tax Year 2008, controlled foreign corporations were tax owners of 17,548 FDEs. These foreign disregarded entities reported \$4.9 trillion in assets and \$230.1 billion in E&P (less deficit) after taxes. Foreign

disregarded entities owned by controlled foreign corporations operated in 146 different countries.<sup>8</sup> Figure D displays foreign disregarded entity data by geographic region and selected country of incorporation. For Tax Year 2008, 64.5 percent of foreign disregarded entities owned by CFCs were incorporated in European countries. European FDEs accounted for 77.3 percent of the ending assets and 64.9 percent of the E&P (less deficit) after income taxes reported for all FDEs.<sup>9</sup> More

### Figure D

#### Foreign Disregarded Entities Owned by Controlled Foreign Corporations: Number of Foreign Disregarded Entities, End-of-Year Total Assets, and Current Earnings and Profits (Less Deficit) After Income Taxes, by Selected Country of Incorporation of Foreign Disregarded Entity, Tax Year 2008

[Money amounts are in thousands of dollars]

Selected country of incorporation of Foreign Disregarded Entity	Number of Foreign Disregarded Entities	End-of-year total assets	Current earnings and profits (less deficit) after income taxes			
				(1)	(2)	(3)
<b>All geographic regions</b>	<b>17,548</b>	<b>4,945,533,640</b>	<b>230,134,514</b>			
<b>Latin America, total</b>	<b>898</b>	<b>118,888,573</b>	<b>5,333,244</b>			
Brazil	226	52,510,855	1,401,648			
Mexico	373	43,071,881	2,515,915			
<b>Other Western Hemisphere, total</b>	<b>1,612</b>	<b>675,472,535</b>	<b>52,634,181</b>			
Bermuda	284	109,106,664	14,931,070			
Canada	414	164,043,570	5,463,031			
Cayman Islands	567	261,369,485	13,430,741			
<b>Europe, total</b>	<b>11,310</b>	<b>3,823,951,744</b>	<b>149,428,466</b>			
European Union, total	10,564	3,615,533,452	131,475,221			
Belgium	270	52,244,608	-127,499			
France (including Corsica, Guadeloupe, Martinique, and Reunion)	1,070	180,188,319	9,929,897			
Germany	1,396	242,261,058	5,414,345			
Ireland	600	382,733,440	45,493,176			
Italy	444	37,565,018	926,700			
Luxembourg	522	517,231,828	5,783,103			
Netherlands	1,590	557,554,696	34,426,903			
Spain (including Canary Isles)	352	33,397,405	405,423			
Sweden	398	61,113,197	5,967,755			
United Kingdom and Northern Ireland (including Gibraltar)	2,762	1,443,462,789	15,566,675			
Other European countries, total	746	208,418,292	17,953,245			
Switzerland	338	127,042,066	15,960,358			
<b>Africa, total</b>	<b>321</b>	<b>24,151,422</b>	<b>597,406</b>			
<b>Asia, total</b>	<b>2,550</b>	<b>181,759,723</b>	<b>16,625,090</b>			
China	817	34,203,609	3,158,502			
Hong Kong	499	49,706,884	2,292,007			
Singapore	394	41,006,306	7,393,438			
<b>Oceania, total</b>	<b>846</b>	<b>120,678,091</b>	<b>5,280,725</b>			
Australia	652	113,857,680	4,537,234			
<b>Puerto Rico and U.S. Possessions, total</b>	<b>11</b>	<b>631,552</b>	<b>235,401</b>			

<sup>8</sup> Based on unpublished data.

<sup>9</sup> Taxpayers use IRS Form 8858, *Informative Return of U.S. Persons With Respect to Foreign Disregarded Estates*, to report information about FDEs. Unlike Form 5471 which is used to collect CFC data, taxpayers do not report foreign income tax paid on Form 8858. As a result, this article does not include FDE data for E&P (less deficit) before income taxes.

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than 93 percent of European FDEs were incorporated in European Union countries. European Union FDEs accounted for 94.5 percent of the assets and 88.0 percent of the E&P (less deficit) after taxes reported for all European FDEs. The United Kingdom domiciled 15.7 percent of all FDEs for Tax Year 2008, far more than any other country. United Kingdom FDEs reported more than \$1.4 trillion in end-of-year assets, more than 29 percent of all FDE assets. Just as in Tax Year 2006, FDEs organized in Ireland generated more E&P (less deficit) after taxes (\$45.5 billion) than any other country. FDEs organized in the Netherlands reported \$34.4 billion of E&P (less deficit) after income taxes, second only to Irish FDEs.

Figure E presents FDE data by industrial sector. For Tax Year 2008, more than 34 percent of FDEs operated in the services sector. These services FDEs reported \$1.6 trillion in assets, second only to FDEs in the finance, insurance, real estate, and rental and leasing sector (\$1.9 trillion). FDEs engaged in services and finance, insurance, real estate, and rental and leasing also reported the most E&P (less deficit) after income taxes, reporting \$80.1 billion and \$51.3 billion, respectively. Together these sectors accounted for 57.1 percent of all FDE earnings.

## Data Sources and Limitations

The statistics presented in this article are based on information collected from corporate income tax returns (Form(s) 1120) with accounting periods ending July 2008 through June 2009 and their attached Form(s) 5471, Information Return of U.S. Persons With Respect to Certain Foreign Corporations. A U.S. corporation is required by Internal Revenue Service regulations to submit a Form 5471 for any Controlled Foreign Corporation (CFC) with an accounting period ending with or within the U.S. parent's accounting period. Thus, the accounting periods for Tax Year 2008 CFCs may have ended as early as July 2007 and as late as June 2009. However, most CFC activity occurred in Calendar Year 2008. These statistics report data for active foreign corporations controlled by U.S. corporations.<sup>10</sup>

Coefficient of variation (CV) tables are not provided because these data are not subject to significant sampling error. For example, CFCs sampled at a 100-percent rate accounted for 96.6 percent of the sampled returns and nearly 88.2 percent of the estimated population. Furthermore, CFCs sampled at a 100-percent rate accounted for 99.9 percent of the total ending assets for all CFCs.<sup>11</sup> However, these data may be subject to nonsampling error.

## Figure E

### Foreign Disregarded Entities Owned by Controlled Foreign Corporations: Number of Foreign Disregarded Entities, End-of-Year Total Assets, and Current Earnings and Profits (Less Deficit) After Income Taxes, by Industrial Sector of Foreign Disregarded Entity, Tax Year 2008

[Money amounts are in thousands of dollars]

Industrial sector of "Category of Filer 4" Foreign Disregarded Entity	Number of Foreign Disregarded Entities	End-of-year total assets	Current earnings and profits (less deficit) after income taxes
	(1)	(2)	(3)
<b>All industries</b>	<b>17,548</b>	<b>4,945,533,640</b>	<b>230,134,514</b>
Raw materials and energy production	748	175,623,875	27,857,276
Goods production	3,446	617,586,355	45,507,642
Distribution and transportation of goods	3,240	348,236,828	21,185,444
Information	1,120	309,455,982	3,577,603
Finance, insurance, real estate, and rental and leasing	2,835	1,911,476,726	51,325,654
Services	6,016	1,576,896,128	80,102,362
Nature of business not allocable	144	6,257,746	578,534

NOTE: Detail may not add to totals because of rounding.

<sup>10</sup> See definition of Active versus inactive Controlled Foreign Corporations in the Explanation of Selected Terms section.

<sup>11</sup> Based on unpublished data.

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Several limitations apply when making comparisons to prior-year statistics. First, the data in this article are based upon a sample of U.S. corporations. For Tax Year 2008, this sample generally includes all CFCs controlled by U.S. corporations with \$50 million or more in total assets or \$5.0 million or more in “proceeds” and all CFCs filed by U.S. corporations with less than \$50 million in the SOI corporate sample.<sup>12</sup> The sample for the Tax Year 2008 CFC statistics is far more inclusive than studies conducted before Tax Year 2004, which included only the 7,500 largest CFCs controlled by U.S. corporations with \$500 million or more in total assets.

Second, statistics previously published by Statistics of Income for tax years before 1986 were for all CFCs controlled by U.S. corporations with total assets of \$250 million or more, and were not limited to the 7,500 largest active CFCs controlled by U.S. corporations with total assets of \$500 million or more. Therefore, the statistics for these years include smaller and also inactive CFCs. For this reason, comparisons between statistics on the largest CFCs and statistics for years before 1986 should be made with caution.

Finally, fluctuations in exchange rates can have significant effects on the reported statistics. Financial statistics that are translated using current (as opposed to historical) rates of exchange can be distorted by large exchange rate fluctuations. For example, the weakening of the U.S. dollar against many currencies from Tax Year 2002 to Tax Year 2004 certainly contributed to the large increases in some of the statistics over that period. The U.S. dollar generally fluctuated far less against most major currencies between Tax Year 2006 and Tax Year 2008 than it had between Tax Year 2002 and Tax Year 2004.

Caution should also be used when comparing data by industrial groupings. Beginning with Tax Year 1998, CFCs were classified under the North American Industry Classification System (NAICS), which differs from the Standard Industrial Classification (SIC) system used before Tax Year 1998. While most industries were not affected by the implementation of NAICS, the groupings of some economic activities were changed. The most significant change was the movement of the management of companies and enterprises sector from finance, insurance, and real estate under the SIC system to the services sector under NAICS. Furthermore, CFCs were classified by industry based on their principal business activity as

reported on Form 5471. However, assets, receipts, and profits may have also been related to secondary business activities. It is not possible to measure the extent of these secondary business activities due to these activities not being detailed on Form 5471.

The data reported on Form 5471 generally represent the financial information of each foreign corporation and not the amounts attributable to the U.S. shareholder filing the Form 5471. Data reported on Form 5471, Schedule I, are the exception to this general rule. The Subpart F income and dividends received reported on Schedule I represent the amount of foreign dividends taxable to the U.S. shareholder filing the Form 5471.

U.S. shareholders do not prepare consolidated Form 5471 filings as they typically do for Forms 1120 that are filed for domestic corporations. U.S. shareholders file a separate Form 5471 for each foreign corporation for which this form is required. As a result, the Form 5471 data presented in this article contain inherent double counting to the extent that intercompany transactions occur.

The foreign disregarded entity data cited in this article are reported on Form 8858, *Information Return of U.S. Persons With Respect to Foreign Disregarded Entities*. The FDE data in this article pertain only to active FDEs that are owned by controlled foreign corporations. Data attributable to inactive FDEs and FDEs that are owned by foreign partnerships or U.S. entities are excluded from the statistics in this article. The sampling procedures used for Forms 8858 mirror those described above for Forms 5471.

As mentioned above, the tax owners of FDEs are treated as owning all FDE assets and liabilities. Consequently, CFCs that are tax owners of FDEs include the earnings and profits of their FDEs in their current E&P. To the extent that FDEs are incorporated in different countries than their tax owners, the geographic statistics for CFCs presented in this article may misrepresent, to some degree, the true geographic source of these earnings and profits. For Tax Year 2008, some 65.6 percent of FDEs owned by CFCs were incorporated in a different country than their tax owner. These FDEs accounted for 48.2 percent of the assets and 50.0 percent of the E&P (less deficit) after income taxes reported by FDEs with tax owners that are CFCs. Figure F presents selected geographic data for FDEs incorporated in countries different than their tax owners. For Tax Year 2008, \$115.2 billion of E&P (less deficit) after income taxes reported by CFCs

<sup>12</sup> See *Statistics of Income—2008, Corporation Income Tax Returns*, for a more complete description of the SOI Corporate sample. The SOI Corporate sample is the basis for the SOI Controlled Foreign Corporation sample. In other words, the Controlled Foreign Corporation sample includes every Form 5471 filed by each corporation in the SOI Corporate sample.

**Figure F**

**Foreign Disregarded Entities Incorporated in Different Countries than Their Controlled Foreign Corporation Tax Owners: Number of Foreign Disregarded Entities and Current Earnings and Profits (Less Deficit) After Income Taxes, by Selected Country of Incorporation of Foreign Disregarded Entity, Tax Year 2008**

[Money amounts are in thousands of dollars]

Selected country of incorporation of Foreign Disregarded Entity	Number of Foreign Disregarded Entities	Current earnings and profits (less deficit) after income taxes
<b>All geographic regions</b>	<b>11,512</b>	<b>115,159,022</b>
<b>Selected countries, total</b>	<b>9,261</b>	<b>109,996,244</b>
Ireland	333	17,892,721
Netherlands	784	14,313,855
Switzerland	225	9,209,606
Cayman Islands	288	8,498,520
Bahamas	26	8,160,842
France (including Corsica, Guadeloupe, Martinique, and Reunion)	744	7,663,722
Singapore	341	6,532,858
Sweden	253	5,944,947
Bermuda	122	3,900,714
China	728	2,968,735
Netherland Antilles	41	2,507,698
Luxembourg	326	2,359,696
Hong Kong	399	2,354,938
Austria	154	1,785,177
Hungary	124	1,705,697
British Virgin Islands	72	1,691,883
Malaysia	148	1,522,075
Germany	900	1,376,058
United Kingdom and Northern Ireland (including Gibraltar)	1,252	1,322,605
Jersey	71	1,206,343
Portugal (including Azores)	65	1,166,034
Brazil	181	976,387
Thailand	49	839,594
Denmark	148	782,549
Barbados	50	736,839
Mexico	204	600,667
Italy	393	573,938
Spain (including Canary Isles)	306	510,805
Malta	29	445,617
Venezuela	21	445,116
Australia	311	397,477
Canada	172	-397,470

were earned by FDEs outside of the CFC's country of incorporation. Table 4 shows CFC data attributable to FDEs by FDE country within CFC country.

The industrial data presented in this article also may be somewhat distorted because FDEs may have different industry codes than the CFCs that own them. Table 5 shows CFC data attributable to FDEs by FDE industrial sector within CFC industrial sector. For Tax Year 2008, some 46.2 percent of FDEs operated in a different industrial sector than their CFC owners. These FDEs accounted for 38.4 percent of the assets and 39.0 percent of the E&P (less deficit) after income taxes reported by all CFC-owned foreign disregarded entities. For Tax Year 2008, some 37.2 percent of the E&P (less deficit) after income taxes for CFCs in the distribution and transportation of goods sector were attributable to FDEs operating in a different industrial sector. Similarly, 19.4 percent and 15.7 percent of the E&P (less deficit) after income taxes reported by CFCs in the goods production and services sectors, respectively, were attributable to FDEs classified in a different industrial sector.

## Explanation of Selected Terms

**Active versus inactive Controlled Foreign Corporations**—In general, a foreign corporation was considered “active” if earnings and profits, income taxes, receipts, expenses, distributions of E&P, or certain transactions between the foreign corporation and its subsidiaries or majority shareholder were reported on Form 5471, Information Return of U.S. Persons with Respect to Certain Foreign Corporations. The filing of Form 5471 was required even if a CFC was dormant or inactive for Tax Year 2008. Only data from active CFCs are included in the statistics in this article, unless otherwise noted.

**Average tax rate**—For purposes of this article, the average tax rate is defined as income tax divided by E&P (less deficit) before income taxes.

**Controlled Foreign Corporation**—Section 957 of the Internal Revenue Code defines a foreign corporation as being “controlled” if more than 50 percent of the total combined voting power of all classes of stock of such corporation entitled to vote, or more than 50 percent of the value of all its outstanding stock, is owned (directly, indirectly, or constructively) by U.S. shareholders on any day during the foreign corporation’s tax year. A U.S. shareholder for purposes of determining control is defined as a “U.S. person”<sup>13</sup> owning 10 percent or more of the foreign corporation’s voting stock. For purposes of these statistics, a foreign corporation was “controlled” only if a single U.S. corporation satisfied the ownership requirements for an uninterrupted period of at least 30 days. These are the only foreign corporations for which

<sup>13</sup> See definition of a “U.S. person” elsewhere in this section.

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complete Form 5471 filings are required. U.S. corporations may also control a CFC through a partnership where the U.S. corporation is the controlling partner. To the extent possible, these CFCs have also been included in these statistics.

*Country of incorporation*—The country of incorporation is the country under whose laws the CFC is legally created. The CFC's country of incorporation is not necessarily the principal place of business. For Tax Year 2008, 1,627 CFCs (1.9 percent) reported a principal place of business that differed from the reported country of incorporation. Tables 2 and 3 provide data by country of incorporation; data by principal place of business are not included in these statistics.

*Current earnings and profits*—“Current earnings and profits” represent the difference between total earnings and profits of the foreign corporation at the end of the current year (before reduction by dividends paid during the year) and the accumulated earnings and profits of the corporation at the beginning of the year. Although current earnings and profits typically are an after-tax measure of profits, they are shown in these statistics both before and after taxes. “Earnings and profits” is a tax concept referring to the economic capacity of a corporation to make a distribution to shareholders that is not a return on capital. The term “earnings and profits” is not specifically defined in the Internal Revenue Code. In those instances where current earnings and profits were not reported for the foreign corporation, net income per books was used in place of missing earnings and profits.

*Distributions out of earnings and profits*—A distribution comes first from current earnings and profits and then from accumulated earnings and profits.

*Income taxes*—CFCs reported income, war profits, and excess profits taxes paid or accrued to any foreign country or U.S. Possession as income tax for their annual accounting period.

*OPEC countries*—The member countries of the Organization of Petroleum Exporting Countries for Tax Year 2008 were: Algeria, Angola, Ecuador, Indonesia, Iran, Iraq, Kuwait, Libya, Nigeria, Qatar, Saudi Arabia, United Arab Emirates, and Venezuela.

*Previously taxed earnings and profits*—This includes any earnings and profit amounts that were subject to U.S. tax in the current year or in a prior year, but not distributed. Previously taxed earnings and profits include amounts related to Subpart F income (see definition below), earnings related to investments in certain U.S. property, previously excluded Subpart F income withdrawn from qualified investments, previously excluded export trade income withdrawn from investment in export trade assets, factoring income, and earnings invested in excess passive assets.

*Subpart F income*—Internal Revenue Code sections 951 and 952 stipulate specific cases in which earnings and profits are deemed to have been paid by a CFC to a U.S. shareholder. Such income is subject to U.S. tax whether or not it is repatriated to U.S. shareholders in the form of an actual dividend. Internal Revenue Code section 951 requires that U.S. shareholders include in their gross incomes certain undistributed profits of foreign corporations controlled by U.S. shareholders. Subpart F income from a CFC includes certain insurance income of U.S. risks, “foreign base company” income, international boycott participation income, bribes and other illegal payments to foreign government officials, and income from any country that the United States does not recognize or from which it has severed relations, or which repeatedly provides support for acts of international terrorism.

*Total receipts*—Total receipts equal business receipts (gross receipts from sales and operations) plus income from investment activity. In the statistics reported prior to 1990, “business receipts” were used to describe the larger of “gross receipts from sales and operations” and “total income.” The latter is a tax return concept used to describe the sum of business receipts less cost of sales and operations (i.e., gross profit), plus income (less loss) from investments.

*U.S. person*—A U.S. person can be a U.S. citizen or resident individual, a domestic partnership, a domestic corporation, or an estate or trust (other than a foreign estate or trust whose income from sources outside the United States is not includable in the beneficiaries’ gross income).

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**Table 1. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, Subpart F Income, and Related Party Transactions, by Industrial Sector and Selected Industrial Subsector of Controlled Foreign Corporation, Tax Year 2008**

[All figures are estimates based on a sample—money amounts are in thousands of dollars]

Industrial sector and selected industrial subsector of Controlled Foreign Corporation	Number of U.S. corporation returns [1]	Controlled Foreign Corporations				
		Number of foreign corporations	Total assets		Total receipts	Current earnings and profits (less deficit) before income taxes
			Beginning of year	End of year		
(1)	(2)	(3)	(4)	(5)	(6)	
<b>All industries</b>	<b>11,929</b>	<b>83,642</b>	<b>15,086,493,220</b>	<b>14,544,673,064</b>	<b>6,001,292,612</b>	<b>661,992,696</b>
<b>Raw materials and energy production</b>	<b>417</b>	<b>2,572</b>	<b>455,114,985</b>	<b>459,218,983</b>	<b>264,091,528</b>	<b>86,026,173</b>
Agriculture, forestry, and fishing	120	538	13,154,261	13,742,810	13,629,907	636,861
Mining, quarrying, and oil and gas extraction	230	1,662	382,624,172	384,366,906	208,087,174	80,728,750
Oil and gas extraction	123	1,043	322,687,415	316,969,927	160,223,731	69,702,274
Mining (except oil and gas)	75	270	40,698,334	44,066,338	23,862,215	7,839,751
Support activities for mining	68	350	19,238,423	23,330,641	24,001,227	3,186,725
Utilities	89	371	59,336,552	61,109,266	42,374,448	4,660,563
<b>Goods production</b>	<b>4,256</b>	<b>20,625</b>	<b>2,040,334,417</b>	<b>2,028,750,106</b>	<b>2,161,545,862</b>	<b>154,396,708</b>
Construction	261	765	18,764,103	19,371,578	30,486,054	3,129,758
Construction of buildings	129	149	2,798,608	3,299,344	3,278,237	392,033
Heavy and civil engineering construction	51	129	2,977,841	3,075,142	3,455,678	337,978
Specialty trade contractors	99	486	12,987,653	12,997,092	23,752,138	2,399,748
Manufacturing	4,047	19,860	2,021,570,314	2,009,378,527	2,131,059,808	151,266,949
Food manufacturing	180	951	133,984,526	133,309,293	139,750,753	9,200,492
Beverage and tobacco product manufacturing	53	400	140,171,713	125,069,600	118,660,117	17,270,418
Beverage manufacturing	45	344	112,054,117	99,978,211	70,221,572	11,628,915
Tobacco manufacturing	9	56	28,117,597	25,091,389	48,438,544	5,641,504
Textile mills and textile product mills	47	118	7,524,908	7,339,043	5,589,388	-19,467
Apparel manufacturing	101	356	6,996,054	7,071,859	11,138,196	525,785
Leather and allied product manufacturing	39	55	1,545,550	1,487,935	2,885,297	154,315
Wood product manufacturing	47	123	4,076,911	3,235,419	3,247,803	-244,915
Paper manufacturing	69	433	57,409,694	46,559,405	43,041,178	824,658
Printing and related support activities	94	312	10,225,699	9,038,660	8,666,283	90,693
Petroleum and coal products manufacturing	43	151	92,524,277	86,131,140	207,097,237	1,075,338
Chemical manufacturing	420	3,221	436,328,168	488,423,973	341,360,288	48,534,882
Basic chemical manufacturing	71	626	66,780,218	64,774,662	54,054,555	4,719,085
Pharmaceutical and medicine manufacturing	116	657	213,729,497	246,052,374	153,836,840	31,985,426
Paint, coating, and adhesive manufacturing	52	412	15,065,446	25,350,030	16,789,293	1,056,461
Soap, cleaning compound, and toilet preparation manufacturing	45	336	22,087,171	21,196,823	30,537,996	3,449,098
Other chemical manufacturing	212	1,190	118,665,836	131,050,085	86,141,603	7,324,812
Plastics and rubber products manufacturing	361	957	52,276,345	51,472,780	51,753,361	2,315,285
Plastics products manufacturing	314	753	29,350,684	29,712,186	25,921,339	1,434,037
Rubber products manufacturing	53	204	22,925,661	21,760,594	25,832,021	881,247
Nonmetallic mineral product manufacturing	87	275	61,301,084	61,117,481	34,147,405	5,192,800
Primary metal manufacturing	148	328	59,367,919	50,613,511	46,812,211	3,688,915
Fabricated metal product manufacturing	453	1,566	66,182,091	67,753,051	55,601,898	4,264,303
Machinery manufacturing	475	1,839	78,882,146	84,027,842	100,290,487	7,129,278
Computer and electronic product manufacturing	685	2,363	234,512,118	235,720,406	263,000,818	23,301,728
Computer and peripheral equipment	151	352	72,731,383	78,666,769	83,747,182	10,536,162
Communications equipment manufacturing	125	647	46,356,355	39,621,040	42,858,028	1,026,863
Semiconductor and other electronic component manufacturing	275	896	92,488,400	96,839,269	115,824,754	10,315,644
Other computer and electronic manufacturing	191	468	22,935,980	20,593,328	20,570,854	1,423,060
Electric equipment, appliance, and component manufacturing	522	1,601	81,044,677	84,054,126	82,486,955	6,554,359
Transportation equipment manufacturing	277	1,538	287,118,088	247,731,508	412,934,160	-2,004,590
Motor vehicle, vehicle body and trailer, and vehicle parts manufacturing	189	1,196	259,154,528	221,561,767	386,671,747	-4,469,829
Other transportation equipment manufacturing	114	341	27,963,561	26,169,741	26,262,413	2,465,239
Furniture and related product manufacturing	47	127	3,704,072	3,187,158	4,912,152	207,279
Miscellaneous manufacturing	891	3,147	206,394,273	216,034,337	197,683,820	23,205,392

Footnotes at end of table.

## Controlled Foreign Corporations, 2008

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**Table 1. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, Subpart F Income, and Related Party Transactions, by Industrial Sector and Selected Industrial Subsector of Controlled Foreign Corporation, Tax Year 2008—Continued**

[All figures are estimates based on a sample—money amounts are in thousands of dollars]

Industrial sector and selected industrial subsector of Controlled Foreign Corporation	Number of U.S. corporation returns [1]	Controlled Foreign Corporations				Current earnings and profits (less deficit) before income taxes	
		Number of foreign corporations	Total assets		Total receipts		
			Beginning of year	End of year			
(1)	(2)	(3)	(4)	(5)	(6)		
Medical equipment and supplies manufacturing	227	856	69,524,798	77,703,033	62,328,013	12,700,293	
Other miscellaneous manufacturing	695	2,291	136,869,476	138,331,304	135,355,807	10,505,099	
<b>Distribution and transportation of goods</b>	<b>3,273</b>	<b>16,758</b>	<b>880,869,716</b>	<b>883,224,540</b>	<b>1,386,018,978</b>	<b>73,618,231</b>	
Wholesale and retail trade	3,010	15,041	831,276,987	827,753,486	1,318,782,353	68,818,275	
Wholesale trade	2,603	13,117	668,672,734	673,977,907	974,124,988	54,099,859	
Motor vehicle and motor vehicle parts and supplies merchant wholesalers	119	409	20,620,097	19,907,708	39,857,481	119,691	
Professional and commercial equipment and supplies merchant wholesalers	154	504	29,590,833	30,516,882	18,928,221	2,043,908	
Electrical and electronic goods merchant wholesalers	355	1,723	62,262,759	56,346,705	96,865,883	3,308,972	
Machinery, equipment, and supplies merchant wholesalers	410	1,768	55,564,578	61,598,234	81,880,713	6,382,550	
Drugs and druggists' sundries merchant wholesalers	122	714	189,171,705	199,808,623	135,557,187	17,009,511	
Apparel, piece goods, and notions merchant wholesalers	84	333	10,666,965	9,947,674	11,365,444	574,215	
Grocery and related products merchant wholesalers	83	386	23,706,505	24,686,301	30,274,438	1,433,344	
Chemical and allied products merchant wholesalers	160	798	22,568,853	20,209,196	42,302,267	1,416,468	
Petroleum and petroleum products merchant wholesalers	46	294	32,754,627	30,271,772	179,864,428	1,195,125	
Other wholesale trade	1,424	6,188	221,765,812	220,684,811	337,228,924	20,616,075	
Retail trade	580	1,924	162,604,253	153,775,579	344,657,365	14,718,417	
Motor vehicle and parts dealers	37	146	7,455,123	5,925,064	16,081,831	289,687	
Electronics and appliance stores	76	158	5,278,090	4,926,528	10,790,549	133,144	
Building materials and garden equipment and supplies dealers	26	100	6,678,683	6,048,604	8,859,045	383,463	
Food and beverage stores	27	49	4,230,180	3,974,116	12,638,795	550,062	
Health and personal care stores	68	158	4,087,534	3,180,839	6,246,252	380,304	
Clothing and clothing accessories stores	59	198	7,559,539	9,159,741	13,707,131	1,174,153	
General merchandise stores	19	83	68,497,836	64,583,999	124,507,033	3,344,449	
Electronic shopping and mail-order houses	47	146	7,128,567	7,454,388	11,794,036	1,142,406	
Other retailers	264	885	51,688,703	48,522,299	140,032,694	7,320,750	
Transportation and warehousing	376	1,716	49,592,728	55,471,053	67,236,625	4,799,955	
Air transportation	26	105	5,632,975	7,468,766	6,108,795	385,442	
Water transportation	53	224	10,722,683	11,488,887	9,660,118	1,871,734	
Truck transportation	53	159	2,926,806	2,850,764	5,692,202	195,291	
Support activities for transportation	189	807	17,158,655	20,310,043	31,869,235	1,189,547	
Other transportation	49	177	8,868,846	8,975,527	9,825,823	989,004	
Warehousing and storage	94	244	4,282,763	4,377,066	4,080,454	168,938	
<b>Information</b>	<b>945</b>	<b>5,066</b>	<b>344,091,645</b>	<b>338,916,808</b>	<b>172,341,418</b>	<b>24,021,218</b>	
Publishing industries (except internet)	300	1,151	80,934,082	79,732,724	45,751,698	5,971,725	
Newspaper, periodical, book and directory publishers	87	686	24,430,552	20,024,566	10,345,949	1,215,124	
Software publishers	220	465	56,503,530	59,708,158	35,405,748	4,756,600	
Motion picture and sound recording industries	64	1,157	44,667,544	41,758,255	32,415,923	2,650,782	
Motion picture and video industries	41	507	19,123,575	18,816,482	21,051,757	1,886,586	
Sound recording industries	30	650	25,543,969	22,941,773	11,364,165	764,196	
Broadcasting (except internet)	30	316	14,898,281	11,988,031	5,716,273	258,799	
Telecommunications [3]	254	1,098	174,143,739	169,083,317	59,208,464	9,182,149	
Data processing, hosting, and related services	175	455	7,802,653	8,207,639	6,112,839	716,075	
Other information services [4]	227	888	21,645,346	28,146,843	23,136,221	5,241,687	

Footnotes at end of table.

# Controlled Foreign Corporations, 2008

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**Table 1. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, Subpart F Income, and Related Party Transactions, by Industrial Sector and Selected Industrial Subsector of Controlled Foreign Corporation, Tax Year 2008—Continued**

[All figures are estimates based on a sample—money amounts are in thousands of dollars]

Industrial sector and selected industrial subsector of Controlled Foreign Corporation	Number of U.S. corporation returns [1]	Controlled Foreign Corporations				
		Number of foreign corporations	Total assets		Total receipts	Current earnings and profits (less deficit) before income taxes
			Beginning of year	End of year		
(1)	(2)	(3)	(4)	(5)	(6)	
<b>Finance, insurance, real estate, and rental and leasing</b>	<b>1,663</b>	<b>10,192</b>	<b>7,433,487,559</b>	<b>6,748,568,576</b>	<b>694,703,129</b>	<b>55,940,822</b>
Finance and insurance	1,195	7,707	7,201,754,964	6,528,542,809	647,434,271	48,092,641
Credit intermediation and related activities	299	1,364	1,396,995,263	1,412,331,496	143,255,860	20,795,308
Depository credit intermediation	37	167	675,805,119	748,345,172	50,376,300	4,745,318
Nondepository credit intermediation	236	948	646,583,277	584,844,632	65,714,544	14,206,649
Activities related to credit intermediation	69	249	74,606,867	79,141,693	27,165,016	1,843,341
Securities, commodity contracts, and other financial investments and related activities	649	3,611	4,419,601,699	3,810,503,958	299,418,983	-11,788,885
Insurance carriers and related activities	418	1,971	620,408,245	587,971,758	143,952,469	15,846,750
Insurance carriers	181	483	479,474,657	445,354,622	100,755,311	10,106,121
Agencies, brokerages, and other insurance related activities	307	1,489	140,933,588	142,617,136	43,197,158	5,740,629
Funds, trusts, and other financial vehicles	197	760	764,749,757	717,735,597	60,806,959	23,239,468
Real estate and rental and leasing	682	2,485	231,732,595	220,025,767	47,268,858	7,848,181
Real estate	464	1,838	102,684,732	94,089,780	19,149,206	4,925,542
Rental and leasing services	168	534	125,584,208	122,715,836	26,750,014	2,624,940
Commercial and industrial machinery and equipment rental and leasing	143	406	97,871,726	98,102,220	15,236,478	2,296,210
Other rental and leasing services	35	128	27,712,482	24,613,616	11,513,535	328,730
Lessors of nonfinancial intangible assets (except copyrighted works)	96	113	3,463,655	3,220,152	1,369,639	297,699
<b>Services</b>	<b>5,896</b>	<b>28,357</b>	<b>3,932,509,215</b>	<b>4,085,945,184</b>	<b>1,322,543,949</b>	<b>267,992,902</b>
Professional, scientific, and technical services	3,837	16,081	506,441,959	501,915,215	374,899,362	39,599,648
Architectural, engineering, and related services	319	1,013	15,219,704	16,081,591	22,712,981	1,382,910
Computer system design and related services	1,570	5,532	294,845,994	294,570,096	197,256,409	25,429,534
Custom computer programming services	322	717	5,126,176	9,004,314	10,264,846	400,976
Computer systems design services	327	685	10,931,682	10,592,400	10,599,186	822,606
Other computer system design and related services	1,034	4,130	278,788,136	274,973,382	176,392,376	24,205,952
Management, scientific, and technical consulting services	499	1,247	37,886,741	40,110,719	33,801,535	3,097,282
Scientific research and development services	588	1,112	11,445,758	9,883,105	10,093,380	106,426
Advertising, public relations, and related services	282	2,550	41,933,604	38,553,382	25,666,276	2,889,805
Other professional, scientific, and technical services	1,295	4,627	105,110,158	102,716,321	85,368,781	6,693,691
Management of companies and enterprises	2,080	7,369	3,257,650,559	3,393,261,222	823,619,628	219,358,730
Administration and support and waste management and remediation services	754	1,966	58,830,091	66,285,285	55,438,663	2,779,470
Educational services	60	342	15,539,101	16,323,042	4,050,940	293,373
Health care and social assistance	116	343	15,093,521	15,312,295	8,078,356	664,660
Arts, entertainment, and recreation	129	464	11,251,834	10,317,062	6,296,962	93,398
Accommodation and food services	102	720	43,582,087	58,460,252	31,141,225	3,570,610
Accommodation	63	400	21,238,772	34,373,561	5,931,327	932,623
Food services and drinking places	40	320	22,343,314	24,086,691	25,209,898	2,637,987
Other services (except public administration)	331	1,072	24,120,063	24,070,811	19,018,812	1,633,012
<b>Nature of business not allocable</b>	<b>57</b>	<b>72</b>	<b>85,684</b>	<b>48,868</b>	<b>47,748</b>	<b>-3,357</b>

Footnotes at end of table.

# Controlled Foreign Corporations, 2008

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**Table 1. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, Subpart F Income, and Related Party Transactions, by Industrial Sector and Selected Industrial Subsector of Controlled Foreign Corporation, Tax Year 2008—Continued**

[All figures are estimates based on a sample—money amounts are in thousands of dollars]

Industrial sector and selected industrial subsector of Controlled Foreign Corporation	Controlled Foreign Corporations					
	Income taxes	Current earnings and profits (less deficit) after income taxes	Foreign corporations with current earnings and profits (+) before income taxes			Distributions out of earnings and profits
			Current earnings and profits before income taxes	Income taxes	Current earnings and profits after income taxes	
	(7)	(8)	(9)	(10)	(11)	(12)
<b>All industries</b>	<b>125,226,476</b>	<b>536,766,219</b>	<b>854,456,504</b>	<b>120,177,246</b>	<b>734,279,258</b>	<b>369,973,531</b>
<b>Raw materials and energy production</b>	<b>30,810,777</b>	<b>55,215,396</b>	<b>91,433,086</b>	<b>30,078,063</b>	<b>61,355,022</b>	<b>34,278,175</b>
Agriculture, forestry, and fishing	168,615	468,246	1,079,047	168,502	910,545	431,107
Mining, quarrying, and oil and gas extraction	29,730,717	50,998,033	85,383,553	29,013,439	56,370,114	31,784,779
Oil and gas extraction	27,420,581	42,281,693	73,079,282	26,775,711	46,303,571	26,916,399
Mining (except oil and gas)	1,560,170	6,279,581	8,676,131	1,552,056	7,124,075	4,661,233
Support activities for mining	749,966	2,436,759	3,628,140	685,672	2,942,468	207,148
Utilities	911,445	3,749,118	4,970,485	896,122	4,074,363	2,062,289
<b>Goods production</b>	<b>28,639,887</b>	<b>125,756,821</b>	<b>194,502,978</b>	<b>27,186,539</b>	<b>167,316,439</b>	<b>78,728,702</b>
Construction	657,003	2,472,755	3,336,433	671,544	2,664,889	1,517,152
Construction of buildings	67,039	324,994	425,022	67,419	357,603	* 13,958
Heavy and civil engineering construction	88,610	249,368	379,852	89,725	290,127	120,734
Specialty trade contractors	501,355	1,898,393	2,531,559	514,400	2,017,159	1,382,460
Manufacturing	27,982,884	123,284,066	191,166,545	26,514,995	164,651,550	77,211,550
Food manufacturing	2,067,468	7,133,024	10,418,828	2,045,475	8,373,353	5,914,415
Beverage and tobacco product manufacturing	3,025,076	14,245,342	18,269,327	2,641,115	15,628,212	7,752,418
Beverage manufacturing	1,724,443	9,904,471	12,594,734	1,345,803	11,248,931	3,355,831
Tobacco manufacturing	1,300,633	4,340,871	5,674,593	1,295,312	4,379,281	4,396,587
Textile mills and textile product mills	62,319	-81,785	295,200	58,617	236,583	61,446
Apparel manufacturing	83,155	442,630	693,618	66,020	627,599	373,298
Leather and allied product manufacturing	25,551	128,764	195,403	24,183	171,220	* 33,046
Wood product manufacturing	19,968	-264,883	117,183	25,867	91,317	70,334
Paper manufacturing	572,464	252,194	2,400,924	552,713	1,848,211	1,046,311
Printing and related support activities	112,698	-22,006	490,277	95,632	394,645	189,959
Petroleum and coal products manufacturing	795,945	279,393	3,680,031	723,954	2,956,077	1,430,194
Chemical manufacturing	7,156,440	41,378,442	52,914,332	6,994,691	45,919,640	20,736,309
Basic chemical manufacturing	1,407,099	3,311,986	5,487,679	1,352,253	4,135,426	2,560,106
Pharmaceutical and medicine manufacturing	2,885,358	29,100,068	33,940,233	2,861,376	31,078,857	12,186,020
Paint, coating, and adhesive manufacturing	214,878	841,584	1,344,240	201,601	1,142,639	788,350
Soap, cleaning compound, and toilet preparation manufacturing	988,119	2,460,979	3,615,920	979,729	2,636,190	1,532,619
Other chemical manufacturing	1,660,986	5,663,826	8,526,260	1,599,732	6,926,529	3,669,213
Plastics and rubber products manufacturing	526,637	1,788,648	3,405,844	519,001	2,886,843	1,820,664
Plastics products manufacturing	290,638	1,143,399	2,099,533	279,222	1,820,311	907,445
Rubber products manufacturing	235,999	645,248	1,306,311	239,779	1,066,532	913,220
Nonmetallic mineral product manufacturing	876,251	4,316,549	5,553,521	871,715	4,681,806	1,970,234
Primary metal manufacturing	709,299	2,979,616	4,621,979	723,231	3,898,748	2,147,593
Fabricated metal product manufacturing	1,027,612	3,236,691	5,197,966	1,004,500	4,193,466	1,719,082
Machinery manufacturing	1,686,476	5,442,803	8,295,936	1,633,230	6,662,707	2,384,520
Computer and electronic product manufacturing	2,101,655	21,200,073	28,360,653	1,955,354	26,405,298	8,218,450
Computer and peripheral equipment manufacturing	521,657	10,014,505	11,172,157	499,863	10,672,294	2,316,491
Communications equipment manufacturing	449,226	577,636	2,145,378	407,044	1,738,334	1,575,092
Semiconductor and other electronic component manufacturing	819,337	9,496,306	12,933,344	756,877	12,176,467	3,517,283
Other computer and electronic manufacturing	311,435	1,111,626	2,109,774	291,570	1,818,204	809,584
Electric equipment, appliance, and component manufacturing	1,161,679	5,392,681	7,898,777	1,128,918	6,769,859	5,632,162
Transportation equipment manufacturing	2,520,423	-4,525,013	12,642,660	2,249,959	10,392,701	5,749,270
Motor vehicle, vehicle body and trailer, and vehicle parts manufacturing	2,007,085	-6,476,913	9,877,687	1,739,308	8,138,379	5,384,516
Other transportation equipment manufacturing	513,338	1,951,901	2,764,973	510,651	2,254,322	364,754
Furniture and related product manufacturing	58,896	148,383	288,830	58,006	230,824	* 69,884
Miscellaneous manufacturing	3,392,873	19,812,519	25,425,254	3,142,814	22,282,440	9,891,961

Footnotes at end of table.

# Controlled Foreign Corporations, 2008

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**Table 1. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, Subpart F Income, and Related Party Transactions, by Industrial Sector and Selected Industrial Subsector of Controlled Foreign Corporation, Tax Year 2008—Continued**

[All figures are estimates based on a sample—money amounts are in thousands of dollars]

Industrial sector and selected industrial subsector of Controlled Foreign Corporation	Controlled Foreign Corporations					
	Income taxes	Current earnings and profits (less deficit) after income taxes	Foreign corporations with current earnings and profits (+) before income taxes			Distributions out of earnings and profits
			Current earnings and profits before income taxes	Income taxes	Current earnings and profits after income taxes	
	(7)	(8)	(9)	(10)	(11)	(12)
Medical equipment and supplies manufacturing	949,054	11,751,239	13,277,138	940,654	12,336,484	4,338,135
Other miscellaneous manufacturing	2,443,819	8,061,280	12,148,116	2,202,160	9,945,956	5,553,826
<b>Distribution and transportation of goods</b>	<b>14,698,547</b>	<b>58,919,684</b>	<b>83,841,104</b>	<b>14,283,039</b>	<b>69,558,065</b>	<b>37,401,938</b>
Wholesale and retail trade	13,976,753	54,841,522	78,125,410	13,563,990	64,561,420	34,031,574
Wholesale trade	10,823,036	43,276,823	61,620,820	10,467,693	51,153,128	29,071,352
Motor vehicle and motor vehicle parts and supplies merchant wholesalers	430,167	-310,476	1,298,091	375,101	922,990	278,813
Professional and commercial equipment and supplies merchant wholesalers	268,146	1,775,762	2,135,872	267,712	1,868,160	265,595
Electrical and electronic goods merchant wholesalers	812,091	2,496,881	4,053,752	756,066	3,297,687	1,202,861
Machinery, equipment, and supplies merchant wholesalers	1,144,891	5,237,659	6,970,786	1,110,050	5,860,736	4,787,173
Drugs and druggists' sundries merchant wholesalers	1,948,277	15,061,234	17,518,184	1,913,498	15,604,687	7,332,567
Apparel, piece goods, and notions merchant wholesalers	181,640	392,575	806,347	169,172	637,175	797,156
Grocery and related products merchant wholesalers	323,248	1,110,096	1,710,710	304,110	1,406,600	1,161,752
Chemical and allied products merchant wholesalers	440,239	976,229	1,576,031	421,553	1,154,478	432,045
Petroleum and petroleum products merchant wholesalers	462,020	733,105	2,159,847	445,478	1,714,369	1,138,404
Other wholesale trade	4,812,315	15,803,760	23,391,201	4,704,954	18,686,247	11,674,987
Retail trade	3,153,717	11,564,699	16,504,590	3,096,297	13,408,293	4,960,222
Motor vehicle and parts dealers	112,619	177,068	406,534	94,699	311,835	71,672
Electronics and appliance stores	61,403	71,741	238,465	56,679	181,786	* 7,481
Building materials and garden equipment and supplies dealers	94,304	289,159	427,676	88,052	339,623	* 4,413
Food and beverage stores	141,168	408,894	570,856	138,571	432,286	* 18,977
Health and personal care stores	121,696	258,608	429,898	121,472	308,426	* 122,241
Clothing and clothing accessories stores	271,249	902,904	1,327,144	263,751	1,063,393	573,772
General merchandise stores	1,314,336	2,030,113	3,964,357	1,313,341	2,651,017	* 858,158
Electronic shopping and mail-order houses	217,637	924,769	1,263,767	212,617	1,051,150	439,440
Other retailers	819,306	6,501,444	7,875,892	807,115	7,068,777	2,864,068
Transportation and warehousing	721,794	4,078,161	5,715,694	719,049	4,996,645	3,370,364
Air transportation	71,545	313,897	439,710	70,615	369,096	229,705
Water transportation	118,486	1,753,248	1,993,443	115,586	1,877,857	1,282,958
Truck transportation	78,902	116,389	293,458	79,405	214,053	32,980
Support activities for transportation	298,641	890,906	1,642,645	299,054	1,343,590	911,072
Other transportation	107,025	881,979	1,074,529	109,046	965,483	864,388
Warehousing and storage	47,196	121,743	271,909	45,343	226,566	49,261
<b>Information</b>	<b>4,608,140</b>	<b>19,413,078</b>	<b>29,606,615</b>	<b>4,547,725</b>	<b>25,058,891</b>	<b>3,901,695</b>
Publishing industries (except internet)	926,719	5,045,006	6,644,571	888,273	5,756,298	1,699,453
Newspaper, periodical, book and directory publishers	285,436	929,689	1,540,566	278,828	1,261,738	452,457
Software publishers	641,283	4,115,317	5,104,005	609,445	4,494,560	1,246,995
Motion picture and sound recording industries	721,228	1,929,554	3,547,711	749,953	2,797,758	227,359
Motion picture and video industries	540,419	1,346,167	2,254,982	525,696	1,729,286	123,117
Sound recording industries	180,809	583,386	1,292,728	224,257	1,068,472	104,242
Broadcasting (except internet)	161,307	97,492	798,689	157,980	640,709	428,075
Telecommunications [3]	2,158,149	7,024,000	12,002,968	2,135,453	9,867,515	416,755
Data processing, hosting, and related services	232,158	483,917	905,213	223,593	681,620	415,917
Other information services [4]	408,580	4,833,108	5,707,464	392,472	5,314,992	714,137

Footnotes at end of table.

# Controlled Foreign Corporations, 2008

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**Table 1. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, Subpart F Income, and Related Party Transactions, by Industrial Sector and Selected Industrial Subsector of Controlled Foreign Corporation, Tax Year 2008—Continued**

[All figures are estimates based on a sample—money amounts are in thousands of dollars]

Industrial sector and selected industrial subsector of Controlled Foreign Corporation	Income taxes	Current earnings and profits (less deficit) after income taxes	Controlled Foreign Corporations			Distributions out of earnings and profits
			Current earnings and profits before income taxes	Income taxes	Current earnings and profits after income taxes	
	(7)	(8)	(9)	(10)	(11)	(12)
<b>Finance, insurance, real estate, and rental and leasing</b>	<b>17,810,920</b>	<b>38,129,902</b>	<b>149,957,029</b>	<b>16,696,336</b>	<b>133,260,693</b>	<b>51,086,993</b>
Finance and insurance	16,685,580	31,407,061	140,005,563	15,626,316	124,379,248	47,926,617
Credit intermediation and related activities	4,158,068	16,637,240	27,846,913	3,989,264	23,857,648	7,350,663
Depository credit intermediation	1,915,237	2,830,081	8,127,446	1,839,041	6,288,405	1,511,411
Nondepository credit intermediation	1,888,746	12,317,903	17,683,976	1,799,818	15,884,158	4,831,107
Activities related to credit intermediation	354,085	1,489,256	2,035,490	350,406	1,685,085	1,008,145
Securities, commodity contracts, and other financial investments and related activities	7,483,815	-19,272,701	54,466,129	7,008,865	47,457,264	24,382,518
Insurance carriers and related activities	3,655,828	12,190,922	20,873,251	3,331,021	17,542,230	6,139,458
Insurance carriers	2,501,381	7,604,740	13,960,138	2,215,297	11,744,841	3,157,750
Agencies, brokerages, and other insurance related activities	1,154,446	4,586,183	6,913,113	1,115,723	5,797,390	2,981,709
Funds, trusts, and other financial vehicles	1,387,869	21,851,599	36,819,271	1,297,165	35,522,106	10,053,978
Real estate and rental and leasing	1,125,339	6,722,842	9,951,466	1,070,021	8,881,445	3,160,376
Real estate	675,634	4,249,908	6,238,016	645,818	5,592,198	2,272,558
Rental and leasing services	334,987	2,289,953	3,396,567	310,293	3,086,274	765,408
Commercial and industrial machinery and equipment rental and leasing	257,513	2,038,697	2,826,845	254,922	2,571,924	400,332
Other rental and leasing services	77,474	251,256	569,722	55,371	514,350	* 365,076
Lessors of nonfinancial intangible assets (except copyrighted works)	114,719	182,981	316,883	113,910	202,972	* 122,410
<b>Services</b>	<b>28,658,121</b>	<b>239,334,780</b>	<b>305,109,747</b>	<b>27,385,479</b>	<b>277,724,268</b>	<b>164,571,320</b>
Professional, scientific, and technical services	6,879,404	32,720,244	49,338,566	6,294,518	43,044,048	14,404,803
Architectural, engineering, and related services	357,115	1,025,795	1,764,024	312,518	1,451,506	328,062
Computer system design and related services	3,475,001	21,954,534	28,943,850	3,072,110	25,871,740	8,132,260
Custom computer programming services	190,606	210,370	861,553	182,691	678,861	332,288
Computer systems design services	199,154	623,452	1,165,709	181,738	983,971	413,840
Other computer system design and related services	3,085,240	21,120,712	26,916,588	2,707,680	24,208,908	7,386,132
Management, scientific, and technical consulting services	625,033	2,472,248	4,039,322	591,287	3,448,035	493,127
Scientific research and development services	98,505	7,921	1,356,215	94,588	1,261,627	113,741
Advertising, public relations, and related services	643,107	2,246,698	3,803,067	615,929	3,187,138	1,419,082
Other professional, scientific, and technical services	1,680,643	5,013,048	9,432,088	1,608,088	7,824,001	3,918,532
Management of companies and enterprises	19,294,644	200,064,086	243,684,229	18,682,706	225,001,523	146,420,880
Administration and support and waste management and remediation services	841,715	1,937,755	3,910,369	797,133	3,113,237	1,430,793
Educational services	53,997	239,377	450,081	49,717	400,364	87,734
Health care and social assistance	334,161	330,499	1,092,392	332,830	759,562	153,466
Arts, entertainment, and recreation	105,211	-11,813	525,807	97,551	428,256	84,020
Accommodation and food services	702,603	2,868,007	3,998,272	690,870	3,307,402	1,124,436
Accommodation	149,068	783,554	1,237,818	136,935	1,100,883	332,492
Food services and drinking places	553,535	2,084,452	2,760,454	553,935	2,206,519	791,944
Other services (except public administration)	446,386	1,186,626	2,110,030	440,154	1,669,876	865,187
<b>Nature of business not allocable</b>	<b>* 85</b>	<b>-3,442</b>	<b>5,945</b>	<b>* 65</b>	<b>5,881</b>	<b>* 4,708</b>

Footnotes at end of table.

# Controlled Foreign Corporations, 2008

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**Table 1. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, Subpart F Income, and Related Party Transactions, by Industrial Sector and Selected Industrial Subsector of Controlled Foreign Corporation, Tax Year 2008—Continued**

[All figures are estimates based on a sample—money amounts are in thousands of dollars]

Industrial sector and selected industrial subsector of Controlled Foreign Corporation	Controlled Foreign Corporations					
	Distributions out of earnings and profits—continued		Dividends paid to controlling U.S. corporation	Total Subpart F income	Receipts by foreign corporations from	
	Not previously taxed earnings and profits	Previously taxed earnings and profits			All sources	All related parties, total
	(13)	(14)	(15)	(16)	(17)	(18)
<b>All industries</b>	<b>264,607,544</b>	<b>105,365,987</b>	<b>96,741,710</b>	<b>80,355,541</b>	<b>6,001,292,612</b>	<b>1,674,484,572</b>
<b>Raw materials and energy production</b>	<b>32,550,558</b>	<b>1,727,617</b>	<b>15,282,001</b>	<b>1,613,824</b>	<b>264,091,528</b>	<b>80,023,180</b>
Agriculture, forestry, and fishing	396,471	34,636	63,899	37,067	13,629,907	5,241,979
Mining, quarrying, and oil and gas extraction	30,335,592	1,449,187	15,143,905	1,471,458	208,087,174	68,508,410
Oil and gas extraction	25,627,134	1,289,265	13,844,110	1,212,174	160,223,731	61,044,636
Mining (except oil and gas)	4,530,933	130,300	1,256,096	102,898	23,862,215	4,910,882
Support activities for mining	177,525	* 29,623	* 43,699	156,386	24,001,227	2,552,892
Utilities	1,818,494	243,795	74,197	105,300	42,374,448	6,272,790
<b>Goods production</b>	<b>62,477,073</b>	<b>16,251,630</b>	<b>19,582,745</b>	<b>16,095,489</b>	<b>2,161,545,862</b>	<b>732,232,431</b>
Construction	1,138,634	378,518	211,747	190,562	30,486,054	7,515,177
Construction of buildings	* 13,070	* 889	* 2,800	* 145	3,278,237	506,438
Heavy and civil engineering construction	109,350	* 11,384	* 63,206	5,500	3,455,678	810,378
Specialty trade contractors	1,016,215	366,245	145,742	184,917	23,752,138	6,198,361
Manufacturing	61,338,438	15,873,112	19,370,998	15,904,927	2,131,059,808	724,717,253
Food manufacturing	4,777,811	1,136,604	2,080,490	980,546	139,750,753	26,481,616
Beverage and tobacco product manufacturing	6,413,799	1,338,619	1,170,489	659,639	118,660,117	41,606,698
Beverage manufacturing	3,031,118	324,713	1,125,253	252,203	70,221,572	19,162,451
Tobacco manufacturing	3,382,681	1,013,906	* 45,237	407,436	48,438,544	22,444,247
Textile mills and textile product mills	44,603	* 16,843	* 20,636	23,870	5,589,388	1,329,461
Apparel manufacturing	327,378	45,920	128,385	75,775	11,138,196	5,333,178
Leather and allied product manufacturing	* 30,025	* 3,020	* 9,183	* 32,526	2,885,297	758,161
Wood product manufacturing	62,520	* 7,814	* 6,724	* 5,972	3,247,803	778,176
Paper manufacturing	877,203	169,108	111,794	143,629	43,041,178	15,721,252
Printing and related support activities	170,111	* 19,848	* 26,278	23,857	8,666,283	1,127,309
Petroleum and coal products manufacturing	1,015,966	414,228	170,691	234,552	207,097,237	82,929,884
Chemical manufacturing	17,388,676	3,347,633	5,230,122	3,688,861	341,360,288	124,743,815
Basic chemical manufacturing	2,121,678	438,428	522,381	161,487	54,054,555	11,739,301
Pharmaceutical and medicine manufacturing	10,364,331	1,821,690	2,372,014	2,733,553	153,836,840	80,177,028
Paint, coating, and adhesive manufacturing	723,901	64,449	169,929	50,718	16,789,293	4,824,998
Soap, cleaning compound, and toilet preparation manufacturing	1,277,247	255,373	727,358	105,881	30,537,996	6,460,721
Other chemical manufacturing	2,901,520	767,694	1,438,440	637,221	86,141,603	21,541,767
Plastics and rubber products manufacturing	1,389,749	430,915	802,060	138,999	51,753,361	15,593,485
Plastics products manufacturing	766,081	141,363	455,271	78,602	25,921,339	7,050,318
Rubber products manufacturing	623,668	289,552	346,789	60,397	25,832,021	8,543,167
Nonmetallic mineral product manufacturing	1,742,197	228,037	246,242	243,965	34,147,405	8,230,875
Primary metal manufacturing	1,539,583	608,010	35,506	326,928	46,812,211	12,735,589
Fabricated metal product manufacturing	1,378,947	340,135	576,297	250,761	55,601,898	13,483,212
Machinery manufacturing	1,804,530	579,990	487,966	854,077	100,290,487	30,632,248
Computer and electronic product manufacturing	5,452,371	2,766,079	4,144,533	3,374,824	263,000,818	72,390,919
Computer and peripheral equipment	1,013,833	1,302,658	436,424	1,524,463	83,747,182	18,176,572
Communications equipment manufacturing	1,469,037	106,055	1,331,361	289,550	42,858,028	17,488,025
Semiconductor and other electronic component manufacturing	2,306,582	1,210,701	2,127,450	1,477,526	115,824,754	31,260,959
Other computer and electronic manufacturing	662,918	146,666	249,299	83,285	20,570,854	5,465,363
Electric equipment, appliance, and component manufacturing	4,576,230	1,055,932	714,806	1,047,501	82,486,955	25,976,923
Transportation equipment manufacturing	4,492,187	1,257,083	2,266,154	1,332,002	412,934,160	178,891,013
Motor vehicle, vehicle body and trailer, and vehicle parts manufacturing	4,181,219	1,203,297	2,067,185	1,164,004	386,671,747	170,995,310
Other transportation equipment manufacturing	310,968	* 53,786	198,969	167,997	26,262,413	7,895,702
Furniture and related product manufacturing	* 69,884	0	* 42,676	* 1,961	4,912,152	1,649,760
Miscellaneous manufacturing	7,784,668	2,107,293	1,099,965	2,464,681	197,683,820	64,323,680

Footnotes at end of table.

## Controlled Foreign Corporations, 2008

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**Table 1. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, Subpart F Income, and Related Party Transactions, by Industrial Sector and Selected Industrial Subsector of Controlled Foreign Corporation, Tax Year 2008—Continued**

[All figures are estimates based on a sample—money amounts are in thousands of dollars]

Industrial sector and selected industrial subsector of Controlled Foreign Corporation	Controlled Foreign Corporations					
	Distributions out of earnings and profits—continued		Dividends paid to controlling U.S. corporation	Total Subpart F income	Receipts by foreign corporations from	
	Not previously taxed earnings and profits	Previously taxed earnings and profits			All sources	All related parties, total
	(13)	(14)	(15)	(16)	(17)	(18)
Medical equipment and supplies manufacturing	3,577,189	760,946	271,447	990,601	62,328,013	31,636,879
Other miscellaneous manufacturing	4,207,479	1,346,347	828,518	1,474,080	135,355,807	32,686,801
<b>Distribution and transportation of goods</b>	<b>21,851,364</b>	<b>15,550,574</b>	<b>6,526,300</b>	<b>7,541,531</b>	<b>1,386,018,978</b>	<b>300,562,070</b>
Wholesale and retail trade	19,878,820	14,152,753	6,066,872	7,195,223	1,318,782,353	287,556,573
Wholesale trade	17,135,340	11,936,012	5,124,120	5,939,715	974,124,988	242,782,491
Motor vehicle and motor vehicle parts and supplies merchant wholesalers	167,180	111,633	103,937	158,996	39,857,481	2,783,373
Professional and commercial equipment and supplies merchant wholesalers	211,780	53,815	115,833	77,019	18,928,221	5,826,439
Electrical and electronic goods merchant wholesalers	990,113	212,748	563,832	383,372	96,865,883	17,480,479
Machinery, equipment, and supplies merchant wholesalers	3,819,497	967,676	688,179	1,303,438	81,880,713	14,800,885
Drugs and druggists' sundries merchant wholesalers	1,224,307	6,108,260	323,571	1,088,144	135,557,187	67,623,833
Apparel, piece goods, and notions merchant wholesalers	344,874	452,282	158,744	57,102	11,365,444	3,180,023
Grocery and related products merchant wholesalers	701,028	460,723	313,585	190,038	30,274,438	5,152,694
Chemical and allied products merchant wholesalers	269,881	162,164	155,889	120,614	42,302,267	5,294,599
Petroleum and petroleum products merchant wholesalers	773,860	364,544	299,148	152,661	179,864,428	46,963,466
Other wholesale trade	8,632,820	3,042,168	2,401,401	2,408,330	337,228,924	73,676,701
Retail trade	2,743,480	2,216,742	942,752	1,255,508	344,657,365	44,774,082
Motor vehicle and parts dealers	56,864	* 14,808	* 5,264	13,045	16,081,831	427,541
Electronics and appliance stores	* 243	* 7,238	* 241	* 167,513	10,790,549	572,917
Building materials and garden equipment and supplies dealers	* 4,413	0	* 1,948	* 109,637	8,859,045	150,517
Food and beverage stores	* 15,996	* 2,981	* 15,273	* 8,271	12,638,795	206,566
Health and personal care stores	* 103,518	* 18,722	* 3,188	26,079	6,246,252	617,715
Clothing and clothing accessories stores	243,201	* 330,570	202,870	242,483	13,707,131	1,026,241
General merchandise stores	* 837,667	* 20,491	* 5,664	* 27,836	124,507,033	1,454,692
Electronic shopping and mail-order houses	342,638	96,802	* 139,941	141,512	11,794,036	614,540
Other retailers	1,138,938	1,725,129	568,363	519,133	140,032,694	39,703,354
Transportation and warehousing	1,972,543	1,397,820	459,428	346,309	67,236,625	13,005,497
Air transportation	206,162	* 23,543	* 5,899	21,347	6,108,795	1,679,133
Water transportation	* 38,551	1,244,407	* 4,279	221,346	9,660,118	3,404,113
Truck transportation	31,769	* 1,211	* 1,724	* 4,499	5,692,202	596,734
Support activities for transportation	801,361	109,711	420,424	78,279	31,869,235	5,501,131
Other transportation	853,326	* 11,062	* 11,534	* 9,458	9,825,823	1,163,883
Warehousing and storage	41,375	* 7,885	* 15,569	* 11,380	4,080,454	660,502
<b>Information</b>	<b>2,972,879</b>	<b>928,816</b>	<b>1,182,501</b>	<b>1,671,025</b>	<b>172,341,418</b>	<b>24,441,641</b>
Publishing industries (except internet)	1,358,910	340,543	687,780	652,901	45,751,698	3,818,793
Newspaper, periodical, book and directory publishers	404,670	47,787	207,012	110,986	10,345,949	1,501,244
Software publishers	954,240	292,756	480,769	541,915	35,405,748	2,317,549
Motion picture and sound recording industries	169,065	58,294	28,409	204,326	32,415,923	4,324,308
Motion picture and video industries	74,137	* 48,981	26,768	82,869	21,051,757	2,068,635
Sound recording industries	94,928	* 9,314	* 1,641	121,457	11,364,165	2,255,673
Broadcasting (except internet)	416,994	* 11,081	12,616	24,395	5,716,273	811,225
Telecommunications [3]	235,712	* 181,043	60,193	353,727	59,208,464	8,711,786
Data processing, hosting, and related services	353,057	62,859	* 271,606	73,287	6,112,839	1,429,804
Other information services [4]	439,141	274,996	121,896	362,389	23,136,221	5,345,725

Footnotes at end of table.

# Controlled Foreign Corporations, 2008

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**Table 1. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, Subpart F Income, and Related Party Transactions, by Industrial Sector and Selected Industrial Subsector of Controlled Foreign Corporation, Tax Year 2008—Continued**

[All figures are estimates based on a sample—money amounts are in thousands of dollars]

Industrial sector and selected industrial subsector of Controlled Foreign Corporation	Controlled Foreign Corporations					
	Distributions out of earnings and profits—continued		Dividends paid to controlling U.S. corporation	Total Subpart F income	Receipts by foreign corporations from	
	Not previously taxed earnings and profits	Previously taxed earnings and profits			All sources	All related parties, total
	(13)	(14)	(15)	(16)	(17)	(18)
<b>Finance, insurance, real estate, and rental and leasing</b>						
Finance and insurance	30,055,487	21,031,506	8,086,882	26,965,313	694,703,129	148,047,881
Finance and insurance	27,887,004	20,039,613	7,682,088	26,235,823	647,434,271	139,920,126
Credit intermediation and related activities	4,721,601	2,629,062	1,786,200	3,339,529	143,255,860	18,501,682
Depository credit intermediation	1,233,840	277,572	489,481	1,289,255	50,376,300	2,185,076
Nondepository credit intermediation	2,636,645	2,194,462	876,085	1,771,735	65,714,544	13,683,862
Activities related to credit intermediation	851,116	157,028	420,633	278,539	27,165,016	2,632,745
Securities, commodity contracts, and other financial investments and related activities	16,288,877	8,093,641	2,990,434	7,086,472	299,418,983	88,194,569
Insurance carriers and related activities	3,297,945	2,841,513	1,209,953	2,958,858	143,952,469	11,160,486
Insurance carriers	1,334,011	1,823,739	638,344	2,231,762	100,755,311	6,725,615
Agencies, brokerages, and other insurance related activities	1,963,934	1,017,775	571,609	727,096	43,197,158	4,434,872
Funds, trusts, and other financial vehicles	3,578,582	6,475,396	1,695,502	12,850,963	60,806,959	22,063,389
Real estate and rental and leasing	2,168,483	991,893	404,794	729,490	47,268,858	8,127,755
Real estate	1,544,619	727,939	195,837	546,642	19,149,206	5,050,524
Rental and leasing services	534,867	230,541	208,957	160,849	26,750,014	2,722,306
Commercial and industrial machinery and equipment rental and leasing	253,155	147,177	* 177,333	157,770	15,236,478	2,451,393
Other rental and leasing services	* 281,712	* 83,364	* 31,624	* 3,080	11,513,535	270,913
Lessors of nonfinancial intangible assets (except copyrighted works)	* 88,997	* 33,413	0	21,999	1,369,639	354,925
<b>Services</b>	<b>114,696,857</b>	<b>49,874,464</b>	<b>46,077,969</b>	<b>26,468,360</b>	<b>1,322,543,949</b>	<b>389,166,462</b>
Professional, scientific, and technical services	9,963,997	4,440,806	3,659,783	3,997,535	374,899,362	113,315,156
Architectural, engineering, and related services	264,997	63,065	121,297	110,195	22,712,981	2,719,295
Computer system design and related services	5,753,981	2,378,279	1,926,575	2,776,096	197,256,409	63,572,528
Custom computer programming services	302,047	30,241	* 231,545	86,046	10,264,846	5,124,324
Computer systems design services	347,317	66,524	* 248,288	131,083	10,599,186	2,180,391
Other computer system design and related services	5,104,617	2,281,515	1,446,741	2,558,967	176,392,376	56,267,813
Management, scientific, and technical consulting services	384,558	108,569	144,959	244,968	33,801,535	8,732,526
Scientific research and development services	88,214	* 25,528	* 8,656	60,510	10,093,380	5,513,446
Advertising, public relations, and related services	1,362,948	56,134	207,127	119,639	25,666,276	4,700,372
Other professional, scientific, and technical services	2,109,300	1,809,232	1,251,169	686,128	85,368,781	28,076,988
Management of companies and enterprises	101,551,023	44,869,857	41,333,011	21,535,553	823,619,628	256,242,442
Administration and support and waste management and remediation services	1,066,578	364,216	293,613	359,041	55,438,663	10,353,999
Educational services	77,358	* 10,376	16,957	6,283	4,050,940	247,779
Health care and social assistance	152,191	* 1,275	35,519	125,425	8,078,356	2,406,104
Arts, entertainment, and recreation	64,235	* 19,785	28,236	37,115	6,296,962	584,341
Accommodation and food services	1,061,662	62,774	501,437	260,071	31,141,225	2,058,126
Accommodation	303,311	29,181	* 109,673	163,321	5,931,327	639,745
Food services and drinking places	758,351	* 33,592	* 391,763	96,750	25,209,898	1,418,381
Other services (except public administration)	759,813	105,375	209,413	147,338	19,018,812	3,958,516
<b>Nature of business not allocable</b>	<b>* 3,328</b>	<b>* 1,380</b>	<b>* 3,312</b>	<b>0</b>	<b>47,748</b>	<b>* 10,907</b>

Footnotes at end of table.

## Controlled Foreign Corporations, 2008

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**Table 1. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, Subpart F Income, and Related Party Transactions, by Industrial Sector and Selected Industrial Subsector of Controlled Foreign Corporation, Tax Year 2008—Continued**

[All figures are estimates based on a sample—money amounts are in thousands of dollars]

Industrial sector and selected industrial subsector of Controlled Foreign Corporation	Controlled Foreign Corporations					
	Receipts by foreign corporations from—continued					Payments by foreign corporations to
	U.S. corporation filing return	Domestic corporations controlled by U.S. corporation filing return	Any foreign corporations controlled by U.S. corporation filing return	All other related parties	Unrelated parties	
	(19)	(20)	(21)	(22)	(23)	(24)
<b>All industries</b>	<b>248,918,233</b>	<b>324,599,686</b>	<b>1,084,373,575</b>	<b>16,593,078</b>	<b>4,393,254,786</b>	<b>5,718,101,389</b>
<b>Raw materials and energy production</b>	<b>11,504,231</b>	<b>36,381,779</b>	<b>32,136,952</b>	<b>* 217</b>	<b>189,304,809</b>	<b>222,465,873</b>
Agriculture, forestry, and fishing	717,965	680,191	3,843,823	0	8,458,218	13,815,238
Mining, quarrying, and oil and gas extraction	10,683,324	31,984,332	25,840,537	* 217	143,663,630	168,696,008
Oil and gas extraction	9,454,158	29,785,188	21,805,289	0	103,252,583	126,787,368
Mining (except oil and gas)	1,213,301	1,307,239	2,390,125	* 217	18,955,694	20,965,505
Support activities for mining	15,865	891,904	1,645,123	0	21,455,354	20,943,135
Utilities	* 102,942	3,717,257	2,452,591	0	37,182,961	39,954,627
<b>Goods production</b>	<b>130,141,535</b>	<b>114,592,974</b>	<b>471,301,135</b>	<b>16,196,787</b>	<b>1,438,386,006</b>	<b>2,086,306,072</b>
Construction	237,021	4,247,393	3,030,247	* 516	23,070,345	29,379,347
Construction of buildings	* 13,587	* 152,781	340,070	0	2,771,799	2,961,852
Heavy and civil engineering construction	* 2,573	29,480	778,325	0	2,646,654	3,464,906
Specialty trade contractors	220,862	4,065,132	1,911,852	* 516	17,651,892	22,952,589
Manufacturing	129,904,514	110,345,580	468,270,888	16,196,271	1,415,315,661	2,056,926,725
Food manufacturing	1,467,934	3,650,973	21,311,005	* 51,705	113,592,854	137,010,766
Beverage and tobacco product manufacturing	250,084	3,947,956	37,408,659	0	78,911,453	110,044,375
Beverage manufacturing	246,207	3,810,387	15,105,857	0	52,914,445	63,294,274
Tobacco manufacturing	* 3,877	137,569	22,302,802	0	25,997,008	46,750,101
Textile mills and textile product mills	298,789	60,341	970,330	0	4,286,744	5,631,077
Apparel manufacturing	2,087,110	1,739,451	1,506,617	0	5,903,437	10,955,095
Leather and allied product manufacturing	138,436	118,898	500,827	0	2,175,486	2,795,710
Wood product manufacturing	160,016	110,389	507,771	0	2,478,795	3,645,211
Paper manufacturing	638,167	5,556,331	9,526,754	0	28,627,581	46,997,859
Printing and related support activities	79,555	53,230	994,523	0	7,543,863	8,858,545
Petroleum and coal products manufacturing	12,116,146	16,626,074	53,219,103	* 968,560	124,168,498	202,091,633
Chemical manufacturing	15,275,893	18,247,617	91,209,201	* 11,104	218,486,726	312,384,108
Basic chemical manufacturing	1,894,860	944,176	8,899,765	* 500	42,437,558	52,346,482
Pharmaceutical and medicine manufacturing	10,856,267	13,740,962	55,579,424	* 375	74,705,895	133,682,709
Paint, coating, and adhesive manufacturing	114,032	476,882	4,234,084	0	12,238,007	16,752,539
Soap, cleaning compound, and toilet preparation manufacturing	386,525	363,530	5,710,665	0	24,387,496	28,652,157
Other chemical manufacturing	2,024,209	2,722,067	16,785,262	* 10,229	64,717,769	80,950,221
Plastics and rubber products manufacturing	3,338,122	1,666,475	10,587,634	* 1,254	36,201,313	51,506,309
Plastics products manufacturing	1,698,973	1,547,912	3,802,179	* 1,254	18,896,437	25,474,967
Rubber products manufacturing	1,639,148	118,563	6,785,456	0	17,304,876	26,031,342
Nonmetallic mineral product manufacturing	607,866	1,220,206	6,402,804	0	25,983,042	30,131,967
Primary metal manufacturing	721,197	3,929,270	8,026,086	* 59,036	34,434,901	46,550,906
Fabricated metal product manufacturing	1,303,852	2,412,465	9,765,099	* 1,795	42,414,402	52,774,275
Machinery manufacturing	7,499,405	4,470,036	18,661,714	* 1,092	69,882,713	95,515,310
Computer and electronic product manufacturing	31,379,657	12,571,099	28,425,044	* 15,118	191,332,995	250,470,881
Computer and peripheral equipment	8,741,146	3,361,957	6,073,469	* [2]	65,779,515	75,594,241
Communications equipment manufacturing	7,580,910	3,150,021	6,757,080	* 14	25,439,051	43,110,322
Semiconductor and other electronic component manufacturing	14,417,942	5,238,759	11,589,154	* 15,104	84,663,789	112,099,976
Other computer and electronic manufacturing	639,659	820,363	4,005,341	0	15,450,639	19,666,341
Electric equipment, appliance, and component manufacturing	3,573,210	5,321,775	17,029,598	* 52,339	56,799,710	81,399,442
Transportation equipment manufacturing	40,183,361	14,626,215	109,084,828	* 14,996,608	234,586,366	420,575,804
Motor vehicle, vehicle body and trailer, and vehicle parts manufacturing	38,709,550	12,179,431	105,109,789	* 14,996,540	216,202,376	396,539,630
Other transportation equipment manufacturing	1,473,811	2,446,784	3,975,038	* 69	18,383,990	24,036,174
Furniture and related product manufacturing	624,345	243,877	781,374	* 164	3,262,401	4,891,337
Miscellaneous manufacturing	8,161,366	13,772,902	42,351,916	37,497	134,242,383	182,696,116

Footnotes at end of table.

## Controlled Foreign Corporations, 2008

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**Table 1. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, Subpart F Income, and Related Party Transactions, by Industrial Sector and Selected Industrial Subsector of Controlled Foreign Corporation, Tax Year 2008—Continued**

[All figures are estimates based on a sample—money amounts are in thousands of dollars]

Industrial sector and selected industrial subsector of Controlled Foreign Corporation	Controlled Foreign Corporations					Payments by foreign corporations to	
	Receipts by foreign corporations from—continued				Unrelated parties		
	U.S. corporation filing return	Domestic corporations controlled by U.S. corporation filing return	Any foreign corporations controlled by U.S. corporation filing return	All other related parties			
	(19)	(20)	(21)	(22)	(23)	(24)	
Medical equipment and supplies manufacturing	3,445,952	9,219,840	18,970,537	* 550	31,234,390	52,583,169	
Other miscellaneous manufacturing	4,715,415	4,553,061	23,381,379	* 36,946	103,007,993	130,112,947	
<b>Distribution and transportation of goods</b>	<b>45,351,197</b>	<b>63,246,266</b>	<b>191,837,636</b>	<b>126,971</b>	<b>1,088,330,524</b>	<b>1,357,280,130</b>	
Wholesale and retail trade	44,766,476	57,604,396	185,059,295	126,405	1,034,054,966	1,290,774,913	
Wholesale trade	43,068,072	43,003,685	156,585,991	124,743	733,869,127	954,758,639	
Motor vehicle and motor vehicle parts and supplies merchant wholesalers	370,363	120,884	2,292,125	0	37,187,265	39,412,805	
Professional and commercial equipment and supplies merchant wholesalers	1,592,765	355,340	3,878,172	* 163	13,143,774	17,196,713	
Electrical and electronic goods merchant wholesalers	4,637,080	824,976	12,016,032	2,391	79,480,387	95,058,378	
Machinery, equipment, and suppliers merchant wholesalers	3,471,530	1,489,128	9,837,049	* 3,177	67,257,029	78,950,662	
Drugs and druggists' sundries merchant wholesalers	13,304,563	5,513,984	48,771,885	* 33,401	68,124,954	134,053,657	
Apparel, piece goods, and notions merchant wholesalers	201,369	813,901	2,164,754	0	8,229,501	11,641,923	
Grocery and related products merchant wholesalers	120,018	1,055,070	3,977,606	0	25,122,615	29,699,428	
Chemical and allied products merchant wholesalers	1,138,821	478,042	3,673,517	* 4,219	37,039,576	41,589,760	
Petroleum and petroleum products merchant wholesalers	6,961,317	20,453,248	19,548,901	0	132,925,068	178,617,453	
Other wholesale trade	11,270,248	11,899,113	50,425,948	81,392	265,358,959	328,537,860	
<b>Retail trade</b>	<b>1,698,404</b>	<b>14,600,711</b>	<b>28,473,305</b>	<b>* 1,663</b>	<b>300,185,839</b>	<b>336,016,274</b>	
Motor vehicle and parts dealers	* 13,968	* 3,451	410,120	* 2	15,662,702	15,873,386	
Electronics and appliance stores	409,760	* 5,567	157,590	0	10,218,928	10,808,576	
Building materials and garden equipment and supplies dealers	* 18,519	* 679	131,319	0	8,709,090	8,622,835	
Food and beverage stores	* 117,254	* 13,586	75,725	0	12,433,818	12,193,386	
Health and personal care stores	* 5,136	* 24,368	588,211	0	5,628,537	5,971,072	
Clothing and clothing accessories stores	117,151	192,905	716,184	0	12,720,146	13,131,433	
General merchandise stores	* 3,713	* 153	1,450,826	0	123,052,341	121,381,928	
Electronic shopping and mail-order houses	110,542	86,015	417,983	0	11,180,615	11,113,879	
Other retailers	902,362	14,273,986	24,525,346	* 1,660	100,579,662	136,919,779	
<b>Transportation and warehousing</b>	<b>584,721</b>	<b>5,641,869</b>	<b>6,778,341</b>	<b>* 566</b>	<b>54,275,558</b>	<b>66,505,217</b>	
Air transportation	* 8,379	70,143	1,600,611	0	4,447,217	5,980,328	
Water transportation	* 58,166	2,332,197	1,013,750	0	6,256,809	9,346,367	
Truck transportation	* 23,078	143,484	430,172	0	5,095,473	5,579,843	
Support activities for transportation	474,617	1,907,769	3,118,593	* 151	26,387,150	31,495,139	
Other transportation	* 2,972	1,018,521	142,390	0	8,662,611	10,134,782	
Warehousing and storage	17,508	169,754	472,825	* 415	3,426,299	3,968,757	
<b>Information</b>	<b>4,054,917</b>	<b>4,517,883</b>	<b>15,855,126</b>	<b>13,715</b>	<b>149,133,738</b>	<b>156,386,920</b>	
Publishing industries (except internet)	1,618,898	420,195	1,768,718	10,982	42,122,681	41,472,416	
Newspaper, periodical, book and directory publishers	222,442	171,888	1,095,931	10,982	9,028,862	10,556,042	
Software publishers	1,396,456	248,307	672,786	0	33,093,819	30,916,374	
Motion picture and sound recording industries	9,758	1,245,367	3,069,183	0	28,181,348	30,057,921	
Motion picture and video industries	* 7,104	722,264	1,339,267	0	19,068,901	19,174,812	
Sound recording industries	* 2,654	523,103	1,729,916	0	9,112,447	10,883,108	
Broadcasting (except internet)	* 3,071	183,556	624,598	0	4,931,064	5,905,947	
Telecommunications [3]	661,736	262,678	7,784,639	* 2,733	50,825,307	54,340,584	
Data processing, hosting, and related services	314,040	651,999	463,765	0	4,751,151	5,924,165	
Other information services [4]	1,447,413	1,754,088	2,144,224	0	18,322,186	18,685,888	

Footnotes at end of table.

# Controlled Foreign Corporations, 2008

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**Table 1. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, Subpart F Income, and Related Party Transactions, by Industrial Sector and Selected Industrial Subsector of Controlled Foreign Corporation, Tax Year 2008—Continued**

[All figures are estimates based on a sample—money amounts are in thousands of dollars]

Industrial sector and selected industrial subsector of Controlled Foreign Corporation	Controlled Foreign Corporations					Payments by foreign corporations to All recipients	
	Receipts by foreign corporations from—continued				Unrelated parties		
	U.S. corporation filing return	Domestic corporations controlled by U.S. corporation filing return	Any foreign corporations controlled by U.S. corporation filing return	All other related parties			
	(19)	(20)	(21)	(22)	(23)	(24)	
<b>Finance, insurance, real estate, and rental and leasing</b>							
Finance and insurance	<b>9,050,209</b>	<b>42,363,698</b>	<b>96,535,692</b>	<b>98,283</b>	<b>558,261,225</b>	<b>686,433,298</b>	
Credit intermediation and related activities	8,906,253	41,496,791	89,424,177	92,905	517,440,569	642,155,056	
Depository credit intermediation	266,157	-2,399,784	20,635,309	0	125,131,747	140,911,668	
Nondepository credit intermediation	86,849	1,449,382	12,147,631	0	52,225,462	65,976,531	
Activities related to credit intermediation	132,033	395,744	2,104,967	0	24,551,064	26,595,010	
Securities, commodity contracts, and other financial investments and related activities	7,222,478	32,009,417	48,955,614	* 7,060	220,043,014	297,739,573	
Insurance carriers and related activities	220,946	7,345,871	3,507,824	* 85,845	133,169,978	141,223,862	
Insurance carriers	91,056	5,688,438	877,331	* 68,790	94,184,810	99,996,978	
Agencies, brokerages, and other insurance related activities	129,890	1,657,434	2,630,493	* 17,055	38,985,168	41,226,885	
Funds, trusts, and other financial vehicles	1,196,671	4,541,286	16,325,431	0	39,095,830	62,279,953	
Real estate and rental and leasing	143,956	866,906	7,111,514	* 5,379	40,820,656	44,278,242	
Real estate	83,557	606,313	4,355,585	* 5,069	15,537,192	18,145,530	
Rental and leasing services	40,087	241,355	2,440,554	* 310	24,265,386	24,956,743	
Commercial and industrial machinery and equipment rental and leasing	39,398	237,082	2,174,724	* 189	13,009,028	13,525,006	
Other rental and leasing services	* 689	4,273	265,830	* 121	11,256,357	11,431,737	
Lessors of nonfinancial intangible assets (except copyrighted works)	* 20,312	* 19,238	315,375	0	1,018,078	1,175,969	
<b>Services</b>	<b>48,816,144</b>	<b>63,497,087</b>	<b>276,696,128</b>	<b>157,103</b>	<b>969,801,322</b>	<b>1,209,172,308</b>	
Professional, scientific, and technical services	31,467,306	17,614,141	64,184,333	49,376	267,196,208	350,252,792	
Architectural, engineering, and related services	345,696	495,759	1,876,217	* 1,623	20,092,207	21,613,206	
Computer system design and related services	22,120,603	8,733,362	32,706,653	* 11,909	136,007,956	179,947,480	
Custom computer programming services	941,377	372,434	3,810,512	0	5,186,321	10,104,526	
Computer systems design services	799,490	781,609	599,292	0	8,512,240	10,222,566	
Other computer system design and related services	20,379,737	7,579,318	28,296,849	* 11,909	122,309,396	159,620,389	
Management, scientific, and technical consulting services	995,584	582,810	7,154,132	0	25,304,645	31,110,576	
Scientific research and development services	2,606,468	1,008,281	1,886,874	* 11,824	4,680,114	10,733,095	
Advertising, public relations, and related services	355,393	700,352	3,644,581	* 46	21,428,931	24,668,005	
Other professional, scientific, and technical services	5,043,562	6,093,577	16,915,876	23,974	59,682,353	82,180,430	
Management of companies and enterprises	15,356,609	42,891,321	197,903,199	91,313	597,645,474	739,169,039	
Administration and support and waste management and remediation services	1,339,938	1,777,651	7,224,066	* 12,344	45,494,907	54,295,146	
Educational services	2,451	36,844	208,485	0	3,812,639	3,913,080	
Health care and social assistance	77,363	102,814	2,225,926	0	5,722,545	7,718,097	
Arts, entertainment, and recreation	32,355	185,427	364,939	* 1,620	5,715,532	6,337,008	
Accommodation and food services	74,502	328,927	1,652,247	* 2,449	29,084,080	29,113,896	
Accommodation	30,284	303,191	303,820	* 2,449	5,292,117	5,618,378	
Food services and drinking places	44,219	25,736	1,348,426	0	23,791,963	23,495,518	
Other services (except public administration)	465,619	559,962	2,932,935	0	15,129,936	18,373,249	
<b>Nature of business not allocable</b>	<b>0</b>	<b>0</b>	<b>* 10,907</b>	<b>0</b>	<b>37,161</b>	<b>56,789</b>	

Footnotes at end of table.

# Controlled Foreign Corporations, 2008

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**Table 1. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, Subpart F Income, and Related Party Transactions, by Industrial Sector and Selected Industrial Subsector of Controlled Foreign Corporation, Tax Year 2008—Continued**

[All figures are estimates based on a sample—money amounts are in thousands of dollars]

Industrial sector and selected industrial subsector of Controlled Foreign Corporation	Controlled Foreign Corporations					
	Payments by foreign corporations to—continued					
	All related parties, total	U.S. corporation filing return	Domestic corporations controlled by U.S. corporation filing return	Any foreign corporations controlled by U.S. corporation filing return	All other related parties	Unrelated parties
	(25)	(26)	(27)	(28)	(29)	(30)
<b>All industries</b>	<b>1,764,995,872</b>	<b>317,415,339</b>	<b>419,468,613</b>	<b>1,016,021,340</b>	<b>12,090,580</b>	<b>3,977,213,228</b>
<b>Raw materials and energy production</b>	<b>65,413,980</b>	<b>7,448,285</b>	<b>18,561,668</b>	<b>39,400,463</b>	<b>* 3,565</b>	<b>159,601,546</b>
Agriculture, forestry, and fishing	3,505,997	193,058	720,321	2,589,309	* 3,310	10,367,986
Mining, quarrying, and oil and gas extraction	57,476,690	7,181,659	16,676,429	33,618,347	* 255	113,143,295
Oil and gas extraction	47,840,092	6,643,711	12,481,986	28,714,141	* 255	80,853,876
Mining (except oil and gas)	5,408,895	275,052	1,415,655	3,718,188	0	15,557,613
Support activities for mining	4,227,704	262,896	2,778,789	1,186,019	0	16,731,806
Utilities	4,431,292	73,568	1,164,918	3,192,807	0	36,090,265
<b>Goods production</b>	<b>627,012,743</b>	<b>112,414,101</b>	<b>138,434,416</b>	<b>365,000,320</b>	<b>11,163,905</b>	<b>1,464,205,216</b>
Construction	7,512,681	356,437	4,712,370	2,442,568	* 1,306	21,902,409
Construction of buildings	298,538	* 25,384	* 75,082	198,072	0	2,672,176
Heavy and civil engineering construction	469,312	59,572	75,238	334,502	0	2,996,105
Specialty trade contractors	6,744,831	271,481	4,562,051	1,909,993	* 1,306	16,234,128
Manufacturing	619,500,062	112,057,665	133,722,046	362,557,752	11,162,599	1,442,302,807
Food manufacturing	29,892,830	4,987,962	3,915,373	20,577,343	412,152	107,154,343
Beverage and tobacco product manufacturing	26,475,099	1,873,524	8,814,239	15,787,336	0	84,922,087
Beverage manufacturing	16,183,202	1,815,438	6,802,690	7,565,073	0	48,352,975
Tobacco manufacturing	10,291,897	* 58,086	2,011,548	8,222,263	0	36,569,112
Textile mills and textile product mills	1,041,846	468,195	98,644	473,281	* 1,725	4,594,765
Apparel manufacturing	3,296,424	1,130,942	446,255	1,719,228	0	7,709,387
Leather and allied product manufacturing	468,562	190,702	73,800	204,060	0	2,327,182
Wood product manufacturing	637,561	140,012	65,332	432,216	0	3,007,655
Paper manufacturing	11,827,689	731,362	2,761,815	8,334,512	0	35,595,986
Printing and related support activities	1,214,428	229,482	171,876	813,069	0	7,645,397
Petroleum and coal products manufacturing	81,601,947	1,279,463	39,543,477	40,747,876	* 31,132	120,496,868
Chemical manufacturing	116,836,979	24,817,850	18,674,556	73,295,815	48,758	195,886,110
Basic chemical manufacturing	13,554,375	2,307,383	3,061,611	8,159,168	* 26,214	38,910,050
Pharmaceutical and medicine manufacturing	68,096,048	14,263,361	9,256,058	44,570,749	* 5,880	65,683,204
Paint, coating, and adhesive manufacturing	5,765,603	677,867	706,060	4,381,676	0	11,021,435
Soap, cleaning compound, and toilet preparation manufacturing	7,835,597	1,601,112	1,220,644	5,013,841	0	20,890,624
Other chemical manufacturing	21,585,356	5,968,126	4,430,183	11,170,381	* 16,665	59,380,797
Plastics and rubber products manufacturing	14,197,087	4,642,930	1,526,932	8,002,099	25,126	37,326,624
Plastics products manufacturing	4,755,057	1,223,292	1,275,882	2,230,756	25,126	20,728,203
Rubber products manufacturing	9,442,030	3,419,637	251,050	5,771,343	0	16,598,420
Nonmetallic mineral product manufacturing	9,220,439	2,798,566	942,093	5,479,605	* 175	21,799,438
Primary metal manufacturing	9,897,191	382,116	2,640,504	6,874,571	0	36,687,493
Fabricated metal product manufacturing	11,462,902	1,798,292	2,391,911	7,258,899	* 13,801	42,105,532
Machinery manufacturing	23,204,042	6,121,628	4,301,843	12,707,732	* 72,839	72,381,925
Computer and electronic product manufacturing	82,550,441	29,066,933	18,633,375	34,830,603	* 19,530	168,321,500
Computer and peripheral equipment manufacturing	26,659,425	5,712,536	7,237,095	13,707,153	* 2,641	48,977,997
Communications equipment manufacturing	14,279,901	6,091,863	1,927,151	6,260,888	0	28,909,643
Semiconductor and other electronic component manufacturing	35,491,577	15,771,568	8,247,084	11,456,037	* 16,889	76,652,815
Other computer and electronic manufacturing	6,119,537	1,490,966	1,222,045	3,406,525	0	13,781,045
Electric equipment, appliance, and component manufacturing	21,292,690	2,977,945	3,999,117	14,296,608	* 19,019	60,171,141
Transportation equipment manufacturing	111,125,240	18,097,417	10,119,853	72,399,527	* 10,508,442	309,630,199
Motor vehicle, vehicle body and trailer, and vehicle parts manufacturing	104,981,063	16,797,152	8,178,139	69,497,339	* 10,508,432	291,718,366
Other transportation equipment manufacturing	6,144,177	1,300,265	1,941,714	2,902,188	* 10	17,911,833
Furniture and related product manufacturing	1,138,008	430,761	126,017	577,318	* 3,912	3,760,781
Miscellaneous manufacturing	62,118,657	9,891,583	14,475,032	37,746,054	5,987	120,778,395

Footnotes at end of table.

# Controlled Foreign Corporations, 2008

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**Table 1. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, Subpart F Income, and Related Party Transactions, by Industrial Sector and Selected Industrial Subsector of Controlled Foreign Corporation, Tax Year 2008—Continued**

[All figures are estimates based on a sample—money amounts are in thousands of dollars]

Industrial sector and selected industrial subsector of Controlled Foreign Corporation	Controlled Foreign Corporations					
	Payments by foreign corporations to—continued					
	All related parties, total	U.S. corporation filing return	Domestic corporations controlled by U.S. corporation filing return	Any foreign corporations controlled by U.S. corporation filing return	All other related parties	Unrelated parties
	(25)	(26)	(27)	(28)	(29)	(30)
Medical equipment and supplies manufacturing	23,025,328	2,884,719	6,877,465	13,260,391	* 2,752	29,719,831
Other miscellaneous manufacturing	39,093,329	7,006,864	7,597,567	24,485,663	* 3,235	91,058,564
<b>Distribution and transportation of goods</b>	<b>482,122,356</b>	<b>98,589,782</b>	<b>99,853,631</b>	<b>283,048,077</b>	<b>630,866</b>	<b>878,107,325</b>
Wholesale and retail trade	465,845,261	96,919,548	92,399,542	275,896,224	629,947	827,512,002
Wholesale trade	390,326,322	91,630,293	77,820,569	220,247,985	627,475	566,888,362
Motor vehicle and motor vehicle parts and supplies merchant wholesalers	10,728,234	1,669,348	2,661,606	6,388,843	* 8,437	28,775,180
Professional and commercial equipment and supplies merchant wholesalers	8,112,993	2,730,104	1,159,607	4,213,837	9,444	9,130,910
Electrical and electronic goods merchant wholesalers	43,858,320	22,124,535	6,070,084	15,652,925	* 10,776	51,234,786
Machinery, equipment, and supplies merchant wholesalers	43,578,798	16,754,556	4,008,120	22,802,182	* 13,940	35,477,316
Drugs and druggists' sundries merchant wholesalers	79,264,341	20,796,704	6,542,321	51,903,143	* 22,173	54,797,210
Apparel, piece goods, and notions merchant wholesalers	3,453,526	634,611	481,891	2,337,023	0	8,217,768
Grocery and related products merchant wholesalers	8,525,073	354,780	1,072,246	7,095,874	* 2,173	21,191,703
Chemical and allied products merchant wholesalers	17,524,010	3,697,275	2,894,779	10,926,351	* 5,606	24,245,758
Petroleum and petroleum products merchant wholesalers	52,279,319	736,050	31,618,163	19,925,096	* 10	126,359,141
Other wholesale trade	123,001,708	22,132,330	21,311,752	79,002,712	554,915	207,458,590
<b>Retail trade</b>	<b>75,518,939</b>	<b>5,289,255</b>	<b>14,578,973</b>	<b>55,648,239</b>	<b>* 2,472</b>	<b>260,623,640</b>
Motor vehicle and parts dealers	1,305,668	102,339	407,795	795,532	* 3	14,570,949
Electronics and appliance stores	2,184,231	311,572	174,406	1,698,253	0	8,624,344
Building materials and garden equipment and supplies dealers	971,915	* 46,623	311,640	613,651	0	7,651,550
Food and beverage stores	1,126,234	418,811	171,231	536,192	0	11,067,449
Health and personal care stores	1,084,698	68,913	129,256	886,529	0	4,891,119
Clothing and clothing accessories stores	3,193,682	300,089	1,241,683	1,651,910	0	9,957,382
General merchandise stores	9,129,854	1,409,562	* 502,688	7,216,530	* 1,073	112,252,074
Electronic shopping and mail-order houses	1,328,415	76,397	604,063	647,955	0	9,785,491
Other retailers	55,194,243	2,554,949	11,036,211	41,601,687	* 1,396	81,823,281
<b>Transportation and warehousing</b>	<b>16,277,095</b>	<b>1,670,234</b>	<b>7,454,089</b>	<b>7,151,853</b>	<b>* 919</b>	<b>50,595,323</b>
Air transportation	1,879,947	28,034	284,003	1,567,909	0	4,272,115
Water transportation	1,784,609	963,748	129,478	691,383	0	7,563,792
Truck transportation	430,595	56,669	196,751	177,175	0	5,149,607
Support activities for transportation	6,737,844	548,652	3,145,884	3,043,307	0	24,944,623
Other transportation	4,616,199	8,958	3,549,874	1,057,367	0	5,519,264
Warehousing and storage	827,902	64,172	148,099	614,711	* 919	3,145,922
<b>Information</b>	<b>35,145,402</b>	<b>8,398,078</b>	<b>10,020,558</b>	<b>16,702,765</b>	<b>24,002</b>	<b>121,514,428</b>
Publishing industries (except internet)	8,717,451	4,256,424	1,278,630	3,173,873	8,524	32,797,391
Newspaper, periodical, book and directory publishers	1,898,014	692,183	395,473	801,834	8,524	8,667,048
Software publishers	6,819,437	3,564,241	883,157	2,372,040	0	24,130,344
Motion picture and sound recording industries	9,189,037	84,697	6,951,741	2,147,681	* 4,918	20,950,019
Motion picture and video industries	6,326,579	* 17,566	5,439,904	864,191	* 4,918	12,919,558
Sound recording industries	2,862,458	67,131	1,511,837	1,283,490	0	8,030,462
Broadcasting (except internet)	1,090,237	11,598	136,594	942,044	0	4,817,563
Telecommunications [3]	7,829,003	452,576	416,620	6,949,248	* 10,560	46,545,839
Data processing, hosting, and related services	1,112,839	188,105	456,755	467,979	0	4,826,374
Other information services [4]	7,206,835	3,404,678	780,218	3,021,939	* [2]	11,577,242

Footnotes at end of table.

# Controlled Foreign Corporations, 2008

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**Table 1. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, Subpart F Income, and Related Party Transactions, by Industrial Sector and Selected Industrial Subsector of Controlled Foreign Corporation, Tax Year 2008—Continued**

[All figures are estimates based on a sample—money amounts are in thousands of dollars]

Industrial sector and selected industrial subsector of Controlled Foreign Corporation	Controlled Foreign Corporations					
	Payments by foreign corporations to—continued					
	All related parties, total	U.S. corporation filing return	Domestic corporations controlled by U.S. corporation filing return	Any foreign corporations controlled by U.S. corporation filing return	All other related parties	Unrelated parties
	(25)	(26)	(27)	(28)	(29)	(30)
<b>Finance, insurance, real estate, and rental and leasing</b>	<b>170,404,177</b>	<b>15,184,427</b>	<b>59,601,282</b>	<b>95,436,779</b>	<b>181,689</b>	<b>525,296,253</b>
Finance and insurance	161,185,759	14,570,258	57,634,558	88,801,452	179,491	489,875,823
Credit intermediation and related activities	32,417,563	1,343,196	11,679,009	19,391,796	* 3,563	109,528,579
Depository credit intermediation	10,297,662	* 30,037	5,091,362	5,176,263	0	38,043,092
Nondepository credit intermediation	19,039,045	889,578	6,016,405	12,129,499	* 3,563	47,934,807
Activities related to credit intermediation	3,080,856	423,580	571,242	2,086,034	0	23,550,680
Securities, commodity contracts, and other financial investments and related activities	94,956,755	8,172,258	34,665,876	52,117,303	* 1,318	210,063,766
Insurance carriers and related activities	11,891,161	904,229	5,451,435	5,360,886	* 174,610	129,868,468
Insurance carriers	6,870,191	642,023	3,716,742	2,336,816	* 174,610	93,464,150
Agencies, brokerages, and other insurance related activities	5,020,970	262,206	1,734,693	3,024,070	0	36,404,319
Funds, trusts, and other financial vehicles	21,920,281	4,150,576	5,838,238	11,931,467	0	40,415,009
Real estate and rental and leasing	9,218,418	614,169	1,966,725	6,635,327	* 2,197	35,420,431
Real estate	5,057,970	312,014	463,978	4,281,373	* 604	13,317,906
Rental and leasing services	3,815,537	298,868	1,396,912	2,118,164	* 1,593	21,271,467
Commercial and industrial machinery and equipment rental and leasing	2,896,637	254,983	1,138,230	1,501,932	* 1,492	10,758,209
Other rental and leasing services	918,899	43,885	258,682	616,231	* 101	10,513,258
Lessors of nonfinancial intangible assets (except copyrighted works)	344,911	* 3,287	105,834	235,790	0	831,057
<b>Services</b>	<b>384,882,438</b>	<b>75,375,355</b>	<b>92,996,302</b>	<b>216,424,227</b>	<b>86,554</b>	<b>828,445,748</b>
Professional, scientific, and technical services	98,993,682	37,525,472	11,932,884	49,515,966	19,359	253,205,157
Architectural, engineering, and related services	2,659,256	1,018,237	547,909	1,092,653	* 457	19,021,668
Computer system design and related services	66,360,076	30,544,069	4,929,115	30,886,369	* 523	114,614,397
Custom computer programming services	4,644,292	1,304,406	379,465	2,960,421	0	5,482,878
Computer systems design services	2,399,000	1,146,657	457,942	794,401	0	7,847,154
Other computer system design and related services	59,316,784	28,093,006	4,091,708	27,131,547	* 523	101,284,365
Management, scientific, and technical consulting services	4,262,813	629,709	452,766	3,180,339	0	26,954,234
Scientific research and development services	1,974,857	912,463	179,468	876,010	* 6,917	8,857,871
Advertising, public relations, and related services	6,280,989	158,339	993,536	5,128,736	* 378	18,480,141
Other professional, scientific, and technical services	17,455,690	4,262,655	4,830,090	8,351,860	11,085	65,276,845
Management of companies and enterprises	265,611,088	33,501,141	76,748,187	155,299,303	62,458	475,469,851
Administration and support and waste management and remediation services	7,629,168	1,228,794	966,539	5,429,920	* 3,914	46,798,157
Educational services	415,116	57,297	172,434	185,385	0	3,499,084
Health care and social assistance	1,981,260	238,449	524,085	1,218,726	0	5,740,262
Arts, entertainment, and recreation	987,094	67,972	407,174	511,948	0	5,484,545
Accommodation and food services	4,327,433	1,342,533	625,429	2,358,832	* 640	24,794,957
Accommodation	1,039,213	233,073	213,049	592,451	* 640	4,586,642
Food services and drinking places	3,288,221	1,109,460	412,380	1,766,381	0	20,208,315
Other services (except public administration)	4,937,596	1,413,697	1,619,569	1,904,147	* 183	13,453,734
<b>Nature of business not allocable</b>	<b>14,775</b>	<b>5,311</b>	<b>* 755</b>	<b>* 8,709</b>	<b>0</b>	<b>42,712</b>

\* Data should be used with caution because of the small number of returns on which they are based.

[1] Number of returns is not additive because some U.S. corporations had Controlled Foreign Corporations in more than one industrial sector. The industrial activity of the parent corporation filing the return often differs from that of the Controlled Foreign Corporations.

[2] Value is less than \$500.

[3] Includes North American Industry Classification System (NAICS) code 518111 (Internet Search Providers) which was previously included with the "Internet service providers, Web search portals, and data processing services" industrial subsector (not included in Table 1 for Tax Year 2008).

[4] Includes North American Industry Classification System (NAICS) codes 516110 (Internet publishing and broadcasting) and 518112 (Web search portals) which were previously included with the "Internet service providers, Web search portals, and data processing services" industrial subsector (not included in Table 1 for Tax Year 2008).

NOTE: Detail may not add to totals because of rounding.

## Controlled Foreign Corporations, 2008

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**Table 2. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, Subpart F Income, and Related Party Transactions, by Selected Country of Incorporation of Controlled Foreign Corporation, Tax Year 2008**

[All figures are estimates based on a sample—money amounts are in thousands of dollars]

Selected country of incorporation of Controlled Foreign Corporation	Number of U.S. corporation returns [1]	Controlled Foreign Corporations				Current earnings and profits (less deficit) before income taxes	
		Number of foreign corporations	Total assets		Total receipts		
			Beginning of year	End of year			
(1)	(2)	(3)	(4)	(5)	(6)		
All geographic regions	11,929	83,642	15,086,493,220	14,544,673,064	6,001,292,612	661,992,696	
Latin America, total	3,370	11,429	680,291,350	603,765,316	483,608,418	46,251,493	
Mexico	2,338	4,910	312,674,302	300,941,620	222,763,722	17,903,832	
Central America and Caribbean countries, total	599	1,473	45,077,332	50,908,917	31,348,199	3,257,164	
Costa Rica	331	450	7,389,395	9,242,789	6,956,572	689,777	
Dominican Republic	79	90	1,284,580	1,323,863	968,812	106,559	
El Salvador	81	135	8,539,913	8,650,483	3,806,439	129,262	
Guatemala	134	249	6,367,689	6,483,510	5,396,145	373,200	
Honduras	91	172	3,491,850	4,081,058	2,768,653	106,174	
Panama (including Canal Zone)	175	282	16,495,478	19,430,783	10,528,299	1,831,859	
Other Central American and Caribbean countries	70	95	1,508,427	1,696,431	923,279	20,333	
South America, total	1,565	5,047	322,539,716	251,914,779	229,496,497	25,090,497	
Argentina	575	868	25,135,563	25,729,670	31,943,377	2,628,273	
Bolivia	37	52	970,149	1,243,023	892,692	159,965	
Brazil	1,043	1,789	207,329,552	134,116,863	123,356,678	12,972,410	
Chile	451	746	40,006,180	36,350,384	20,868,007	2,818,230	
Colombia	292	456	17,755,026	19,846,619	15,908,380	1,585,256	
Ecuador	102	163	1,837,740	1,965,322	3,504,105	221,313	
Peru	233	297	10,595,990	10,080,952	7,748,309	1,747,150	
Uruguay	146	205	2,756,390	3,678,212	3,682,864	210,015	
Venezuela	287	416	14,683,989	17,566,326	18,959,471	2,609,779	
Other South American countries	40	55	1,469,136	1,337,409	2,632,614	138,105	
Other Western Hemisphere, total	4,454	10,846	2,880,942,429	2,790,025,743	1,292,605,484	185,495,142	
Bahamas	94	372	85,574,087	94,654,076	52,340,369	16,848,178	
Barbados	133	179	12,336,650	13,545,672	3,835,368	-373,144	
Bermuda	435	1,008	880,540,139	841,173,421	312,487,313	68,587,299	
British Virgin Islands	278	419	50,228,624	57,203,719	34,386,984	7,875,626	
Canada	3,695	6,829	1,126,532,342	960,207,182	627,899,351	47,696,271	
Cayman Islands	587	1,677	669,816,781	725,242,367	250,660,307	43,043,511	
Jamaica	37	48	2,211,706	1,906,002	1,499,234	105,332	
Netherland Antilles	82	117	49,243,663	91,403,297	7,594,501	1,357,613	
Trinidad and Tobago	62	74	1,706,283	1,928,495	670,775	113,711	
Other Western Hemisphere countries	67	123	2,752,154	2,761,511	1,231,281	240,747	
Europe, total	5,715	35,856	9,403,791,526	9,089,586,485	3,033,576,522	327,186,027	
European Union, total	5,546	32,564	8,825,695,866	8,434,622,314	2,635,200,438	266,658,835	
Austria	367	527	23,374,008	25,621,912	18,398,209	1,476,301	
Belgium	671	1,222	105,491,919	111,436,943	69,673,618	3,761,694	
Bulgaria	80	101	603,425	682,165	809,902	45,687	
Cyprus	99	138	8,443,547	10,730,030	3,033,676	695,686	
Czech Republic	382	581	26,731,197	20,651,512	19,550,305	1,346,144	
Denmark	429	693	37,210,893	44,507,017	23,318,302	2,103,187	
Estonia	59	65	456,185	424,119	709,497	38,131	
Finland	260	385	12,854,933	14,606,623	8,925,141	395,513	
France (including Corsica, Guadeloupe, Martinique, and Reunion)	1,459	3,522	313,037,160	308,582,059	170,021,913	14,379,780	
Germany	1,874	4,094	481,934,674	522,535,957	262,917,398	15,713,817	
Greece	184	264	8,528,636	8,438,610	9,528,829	612,276	
Hungary	310	449	37,826,489	36,010,547	18,276,130	1,941,579	
Ireland	670	1,202	644,440,681	735,862,289	226,920,124	60,243,214	
Italy	912	1,665	105,199,590	98,266,680	81,820,648	5,748,313	
Latvia	42	51	1,413,821	1,357,597	574,018	-6,644	
Lithuania	39	46	612,313	603,372	903,657	66,277	
Luxembourg	349	681	815,373,255	828,469,211	271,013,325	30,706,183	
Malta	22	31	1,505,972	1,315,768	718,139	126,765	
Netherlands	1,570	3,505	1,447,732,109	1,530,361,553	425,599,030	94,411,437	

Footnotes at end of table.

## Controlled Foreign Corporations, 2008

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**Table 2. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, Subpart F Income, and Related Party Transactions, by Selected Country of Incorporation of Controlled Foreign Corporation, Tax Year 2008—Continued**

[All figures are estimates based on a sample—money amounts are in thousands of dollars]

Selected country of incorporation of Controlled Foreign Corporation	Number of U.S. corporation returns [1]	Number of foreign corporations	Controlled Foreign Corporations			
			Total assets		Total receipts	Current earnings and profits (less deficit) before income taxes
			Beginning of year	End of year		
(1)	(2)	(3)	(4)	(5)	(6)	
Poland	498	847	56,862,855	65,541,260	38,548,275	3,525,316
Portugal (including Azores)	248	419	28,421,831	28,559,203	15,702,627	1,947,968
Romania	166	254	7,362,317	7,963,274	8,201,252	231,039
Slovakia	154	213	5,066,207	6,015,988	4,761,532	224,613
Slovenia	51	65	997,926	1,046,927	1,249,313	68,267
Spain (including Canary Isles)	851	1,785	207,670,482	177,768,246	181,753,636	13,947,862
Sweden	583	1,052	100,308,054	106,956,533	50,538,470	828,850
United Kingdom and Northern Ireland (including Gibraltar)	3,507	8,707	4,346,235,389	3,740,306,920	721,733,470	12,079,582
Other European countries, total	1,115	3,292	578,095,659	654,964,171	398,376,083	60,527,192
Croatia	55	75	3,562,079	3,273,366	1,067,575	2,767
Guerney	42	67	18,228,731	22,520,669	1,267,605	604,382
Jersey	48	101	54,360,283	49,970,367	4,486,115	605,077
Norway	261	474	33,121,421	29,581,232	21,900,588	5,959,311
Russia	350	735	19,519,020	28,831,871	34,268,105	2,988,158
Serbia	73	106	542,378	696,754	1,015,903	27,473
Switzerland	741	1,411	434,106,468	505,771,402	324,325,636	48,096,014
Ukraine	125	172	3,170,471	2,881,442	6,036,406	637,672
Other European countries	96	152	11,484,807	11,437,068	4,008,150	1,606,338
<b>Africa, total</b>	<b>719</b>	<b>1,723</b>	<b>86,366,063</b>	<b>73,257,504</b>	<b>47,938,317</b>	<b>7,956,878</b>
North Africa, total	168	331	5,988,961	7,069,793	7,065,615	641,497
Egypt	92	153	3,739,161	4,457,266	4,381,904	364,127
Morocco	62	79	1,545,650	1,704,639	1,558,893	160,917
Other North African countries	62	99	704,151	907,888	1,124,818	116,454
East Africa, total	282	422	46,541,682	31,091,044	5,869,099	1,166,796
Mauritius	244	335	45,269,236	29,915,151	4,968,531	1,085,149
Other East African countries	55	87	1,272,446	1,175,893	900,568	81,646
West and Central Africa, total	109	219	16,659,829	21,168,463	11,088,909	4,364,336
Liberia	13	32	7,086,594	8,031,894	2,415,126	827,663
Nigeria	63	92	7,642,200	10,130,628	6,994,715	3,629,867
Other West and Central African countries	54	95	1,931,035	3,005,941	1,679,069	-93,194
Southern Africa, total	411	751	17,175,591	13,928,204	23,914,693	1,784,249
South Africa	402	675	16,207,652	13,073,625	22,516,696	1,735,974
Other Southern African countries	37	76	967,939	854,579	1,397,997	48,275
<b>Asia, total</b>	<b>5,179</b>	<b>19,679</b>	<b>1,568,180,864</b>	<b>1,559,488,877</b>	<b>943,783,025</b>	<b>63,116,884</b>
Central, Northern, and Southwestern Asia, total	302	488	21,872,540	22,134,661	32,675,995	4,351,062
Kazakhstan	48	57	2,756,053	3,211,693	2,224,744	992,543
Turkey	260	389	18,755,630	18,365,845	29,947,814	3,176,423
Other Central, Northern, and Southwestern Asian countries	29	42	360,857	557,123	503,436	182,097
Middle East, total	807	1,302	37,025,076	38,082,978	31,949,245	1,278,189
Israel	595	893	31,747,506	31,049,596	18,566,851	363,136
Saudi Arabia	50	61	1,336,921	1,893,187	2,675,037	320,109
United Arab Emirates	172	218	2,145,750	3,054,793	8,884,403	453,526
Other Middle East countries	90	130	1,794,898	2,085,403	1,822,953	141,417
Southern and Southeastern Asia, total	2,473	6,750	338,005,086	323,339,196	281,430,038	26,785,827
India	1,478	2,094	40,145,754	37,901,794	45,759,896	4,766,296
Indonesia	230	359	16,094,005	21,391,834	19,884,514	3,516,193
Malaysia	524	870	33,907,342	33,641,309	28,249,795	2,027,892
Pakistan	54	58	825,784	883,832	1,326,812	116,727
Philippines	328	557	17,182,578	17,120,409	16,728,113	1,308,483
Singapore	1,200	1,843	203,383,365	187,225,044	136,468,290	13,767,264
Thailand	455	757	24,502,762	23,502,008	30,820,484	1,186,487
Vietnam	91	107	1,599,449	1,239,762	1,455,243	36,753
Other Southern and Southeastern Asian countries	70	104	364,048	433,202	736,892	59,732

Footnotes at end of table.

## Controlled Foreign Corporations, 2008

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**Table 2. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, Subpart F Income, and Related Party Transactions, by Selected Country of Incorporation of Controlled Foreign Corporation, Tax Year 2008—Continued**

[All figures are estimates based on a sample—money amounts are in thousands of dollars]

Selected country of incorporation of Controlled Foreign Corporation	Number of U.S. corporation returns [1]	Controlled Foreign Corporations				
		Number of foreign corporations	Total assets		Total receipts	Current earnings and profits (less deficit) before income taxes
			Beginning of year	End of year		
	(1)	(2)	(3)	(4)	(5)	(6)
Australia	1,425	2,802	424,094,591	380,789,381	157,852,324	23,673,099
New Zealand	433	637	13,260,816	10,646,367	11,397,006	918,952
Other countries of Oceania	43	111	2,569,101	2,833,961	1,122,961	937,838
<b>Puerto Rico and U.S. Possessions, total</b>	<b>370</b>	<b>559</b>	<b>26,996,480</b>	<b>34,279,430</b>	<b>29,408,556</b>	<b>6,456,383</b>
Puerto Rico	311	423	24,330,711	31,354,286	27,736,448	6,413,405
U.S. Possessions, total	82	136	2,665,769	2,925,144	1,672,107	42,978
Virgin Islands, U.S.	51	80	2,194,386	2,375,714	878,423	-12,750
Other U.S. Possessions	37	56	471,383	549,430	793,684	55,727
<b>OPEC countries, total (countries included above)</b>	<b>607</b>	<b>1,402</b>	<b>44,387,489</b>	<b>57,035,039</b>	<b>62,095,391</b>	<b>10,903,639</b>

Footnotes at end of table.

## Controlled Foreign Corporations, 2008

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**Table 2. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, Subpart F Income, and Related Party Transactions, by Selected Country of Incorporation of Controlled Foreign Corporation, Tax Year 2008—Continued**

[All figures are estimates based on a sample—money amounts are in thousands of dollars]

Selected country of incorporation of Controlled Foreign Corporation	Controlled Foreign Corporations					
	Income taxes	Current earnings and profits (less deficit) after income taxes	Foreign corporations with current earnings and profits (+) before income taxes			Distributions out of earnings and profits
			Current earnings and profits before income taxes	Income taxes	Current earnings and profits after income taxes	
	(7)	(8)	(9)	(10)	(11)	(12)
<b>All geographic regions</b>	<b>125,226,476</b>	<b>536,766,219</b>	<b>854,456,504</b>	<b>120,177,246</b>	<b>734,279,258</b>	<b>369,973,531</b>
<b>Latin America, total</b>	<b>12,612,434</b>	<b>33,639,059</b>	<b>54,304,847</b>	<b>12,171,064</b>	<b>42,133,783</b>	<b>23,610,368</b>
Mexico	4,391,298	13,512,534	21,825,305	4,217,434	17,607,871	7,846,701
Central America and Caribbean countries, total	592,657	2,664,507	3,731,986	568,272	3,163,714	2,014,283
Costa Rica	139,656	550,121	759,847	134,145	625,702	249,600
Dominican Republic	27,327	79,232	123,619	26,961	96,658	78,585
El Salvador	38,914	90,349	222,257	31,002	191,255	33,855
Guatemala	103,807	269,393	438,547	98,197	340,350	358,982
Honduras	33,619	72,554	176,539	32,117	144,422	60,278
Panama (including Canal Zone)	227,923	1,603,936	1,912,669	225,216	1,687,453	1,199,184
Other Central American and Caribbean countries	21,411	-1,078	98,508	20,633	77,875	33,800
South America, total	7,628,479	17,462,018	28,747,556	7,385,359	21,362,197	13,749,384
Argentina	984,667	1,643,606	3,043,240	952,726	2,090,514	1,507,280
Bolivia	40,104	119,861	167,733	40,023	127,710	* 14,701
Brazil	4,087,319	8,885,091	15,326,069	3,915,382	11,410,687	7,531,497
Chile	495,121	2,323,109	3,159,698	489,407	2,670,291	1,921,338
Colombia	470,884	1,114,372	1,751,092	458,889	1,292,203	606,735
Ecuador	57,889	163,424	244,509	54,476	190,032	85,057
Peru	625,468	1,121,683	1,888,999	621,610	1,267,389	1,394,574
Uruguay	27,743	182,272	260,512	26,666	233,846	52,337
Venezuela	798,848	1,810,931	2,755,744	789,491	1,966,253	621,149
Other South American countries	40,436	97,670	149,960	36,689	113,271	14,716
<b>Other Western Hemisphere, total</b>	<b>34,110,327</b>	<b>151,384,815</b>	<b>217,493,022</b>	<b>32,668,145</b>	<b>184,824,877</b>	<b>100,971,940</b>
Bahamas	3,067,559	13,780,620	17,660,746	3,044,892	14,615,854	12,173,213
Barbados	91,066	-464,211	469,002	81,760	387,242	358,314
Bermuda	10,088,314	58,498,985	72,386,105	9,899,051	62,487,054	33,616,555
British Virgin Islands	743,036	7,132,590	8,637,566	719,919	7,917,647	1,697,531
Canada	12,099,817	35,596,454	61,233,066	10,981,108	50,251,959	35,347,550
Cayman Islands	7,780,796	35,262,715	55,070,647	7,705,744	47,364,903	16,929,504
Jamaica	9,815	95,517	115,719	9,853	105,866	* 34,105
Netherland Antilles	139,059	1,218,553	1,437,226	135,419	1,301,807	753,052
Trinidad and Tobago	19,437	94,273	133,301	19,267	114,033	* 28,059
Other Western Hemisphere countries	71,428	169,319	349,642	71,134	278,509	34,057
<b>Europe, total</b>	<b>54,405,391</b>	<b>272,780,637</b>	<b>447,875,315</b>	<b>52,260,063</b>	<b>395,615,253</b>	<b>193,168,805</b>
European Union, total	45,207,781	221,451,053	383,358,292	43,195,159	340,163,133	170,743,134
Austria	277,149	1,199,152	1,925,014	266,521	1,658,493	1,553,802
Belgium	1,099,774	2,661,920	5,198,421	1,070,081	4,128,340	3,565,386
Bulgaria	7,891	37,796	65,611	7,577	58,034	* 34,921
Cyprus	90,141	605,545	760,932	89,058	671,874	114,193
Czech Republic	308,105	1,038,039	1,654,306	293,596	1,360,710	559,394
Denmark	380,019	1,723,168	2,624,897	373,601	2,251,296	897,554
Estonia	* 2,288	35,844	44,701	* 2,261	42,440	* 9,145
Finland	119,286	276,227	691,005	109,840	581,165	310,157
France (including Corsica, Guadeloupe, Martinique, and Reunion)	3,171,200	11,208,580	17,597,658	3,078,900	14,518,759	7,393,485
Germany	3,524,147	12,189,670	21,990,185	3,282,406	18,707,779	12,860,375
Greece	242,022	370,254	716,462	232,939	483,523	257,417
Hungary	248,342	1,693,236	2,310,363	228,375	2,081,988	3,345,789
Ireland	3,279,086	56,964,128	66,492,981	3,172,032	63,320,949	13,401,191
Italy	2,172,233	3,576,080	7,357,435	1,828,267	5,529,168	5,844,373
Latvia	6,034	-12,677	19,489	2,523	16,966	11,476
Lithuania	12,681	53,596	70,036	11,199	58,837	65,900
Luxembourg	2,744,313	27,961,870	33,846,150	2,682,007	31,164,143	17,614,005
Malta	30,259	96,505	128,786	30,115	98,671	* 2,477
Netherlands	12,563,568	81,847,869	102,320,462	11,949,021	90,371,441	53,731,071

Footnotes at end of table.

## Controlled Foreign Corporations, 2008

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**Table 2. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, Subpart F Income, and Related Party Transactions, by Selected Country of Incorporation of Controlled Foreign Corporation, Tax Year 2008—Continued**

[All figures are estimates based on a sample—money amounts are in thousands of dollars]

Selected country of incorporation of Controlled Foreign Corporation	Controlled Foreign Corporations					
	Income taxes	Current earnings and profits (less deficit) after income taxes	Foreign corporations with current earnings and profits (+) before income taxes			Distributions out of earnings and profits
			Current earnings and profits before income taxes	Income taxes	Current earnings and profits after income taxes	
	(7)	(8)	(9)	(10)	(11)	(12)
Poland	829,646	2,695,669	4,002,791	811,962	3,190,829	1,475,178
Portugal (including Azores)	300,764	1,647,205	2,201,063	282,263	1,918,800	867,085
Romania	95,581	135,458	597,054	90,816	506,238	163,555
Slovakia	57,256	167,356	334,978	55,862	279,116	137,342
Slovenia	23,194	45,073	88,649	23,153	65,496	* 38,508
Spain (including Canary Isles)	2,613,574	11,334,288	16,345,032	2,542,784	13,802,248	7,701,340
Sweden	603,780	225,070	3,935,628	567,307	3,368,320	1,130,098
United Kingdom and Northern Ireland (including Gibraltar)	10,405,448	1,674,134	90,038,203	10,110,694	79,927,510	37,657,916
Other European countries, total	9,197,609	51,329,583	64,517,023	9,064,904	55,452,119	22,425,671
Croatia	10,563	-7,796	49,066	14,186	34,880	15,816
Guernsey	5,477	598,905	649,447	* 5,404	644,044	328,520
Jersey	66,754	538,322	1,114,286	60,497	1,053,789	235,617
Norway	4,018,107	1,941,204	6,600,649	4,004,166	2,596,483	1,639,846
Russia	930,916	2,057,242	3,688,381	899,550	2,788,831	1,088,572
Serbia	6,055	21,417	65,331	5,378	59,953	* 42,954
Switzerland	3,117,765	44,978,249	49,829,168	3,058,041	46,771,126	17,635,887
Ukraine	225,013	412,659	783,705	202,990	580,716	337,249
Other European countries	816,958	789,380	1,736,990	814,693	922,298	1,101,211
<b>Africa, total</b>	<b>2,886,274</b>	<b>5,070,603</b>	<b>8,998,787</b>	<b>2,855,262</b>	<b>6,143,525</b>	<b>3,457,183</b>
North Africa, total	115,125	526,372	728,606	109,252	619,354	131,174
Egypt	53,742	310,385	414,864	51,350	363,514	71,084
Morocco	40,196	120,721	175,938	39,048	136,890	36,071
Other North African countries	21,188	95,266	137,804	18,853	118,951	* 24,020
East Africa, total	226,442	940,353	1,491,796	220,454	1,271,342	1,042,546
Mauritius	199,351	885,798	1,385,788	194,637	1,191,151	1,027,386
Other East African countries	27,091	54,555	106,008	25,817	80,191	* 15,160
West and Central Africa, total	2,122,460	2,241,876	4,731,685	2,115,094	2,616,591	1,451,224
Liberia	* 213,439	614,224	901,879	* 213,439	688,440	* 168,993
Nigeria	1,882,082	1,747,784	3,741,989	1,878,950	1,863,039	1,267,817
Other West and Central African countries	26,939	-120,133	87,817	22,705	65,111	14,414
Southern Africa, total	422,247	1,362,002	2,046,701	410,462	1,636,238	832,238
South Africa	401,304	1,334,670	1,962,723	391,531	1,571,192	820,027
Other Southern African countries	20,942	27,332	83,978	18,931	65,047	12,211
<b>Asia, total</b>	<b>16,638,351</b>	<b>46,478,533</b>	<b>89,372,863</b>	<b>15,666,242</b>	<b>73,706,621</b>	<b>37,627,341</b>
Central, Northern, and Southwestern Asia, total	1,007,177	3,343,886	4,782,922	988,577	3,794,345	1,238,138
Kazakhstan	502,790	489,753	1,022,895	503,419	519,477	* 130,354
Turkey	502,010	2,674,413	3,568,113	482,902	3,085,212	1,090,670
Other Central, Northern, and Southwestern Asian countries	2,377	179,720	191,913	2,256	189,656	* 17,115
Middle East, total	351,354	926,835	2,965,796	327,313	2,638,483	795,600
Israel	300,714	62,422	1,898,552	276,408	1,622,144	464,409
Saudi Arabia	33,259	286,850	343,730	33,561	310,169	95,207
United Arab Emirates	6,008	447,518	528,837	6,849	521,988	181,393
Other Middle East countries	11,372	130,045	194,677	10,495	184,182	54,591
Southern and Southeastern Asia, total	4,765,059	22,020,768	30,349,271	4,636,302	25,712,969	14,166,804
India	1,195,180	3,571,116	5,632,953	1,165,969	4,466,984	1,062,878
Indonesia	1,276,432	2,239,760	3,613,531	1,270,880	2,342,651	1,532,414
Malaysia	324,848	1,703,044	2,251,969	318,779	1,933,190	787,329
Pakistan	39,500	77,227	149,555	38,541	111,014	61,115
Philippines	337,641	970,842	1,520,521	309,325	1,211,196	491,109
Singapore	1,068,070	12,699,194	15,045,603	1,041,674	14,003,930	9,195,843
Thailand	492,606	693,881	1,950,917	463,879	1,487,038	953,564
Vietnam	15,580	21,173	119,037	12,164	106,873	* 64,345
Other Southern and Southeastern Asian countries	15,202	44,530	65,185	15,092	50,093	18,208

Footnotes at end of table.

## Controlled Foreign Corporations, 2008

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**Table 2. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, Subpart F Income, and Related Party Transactions, by Selected Country of Incorporation of Controlled Foreign Corporation, Tax Year 2008—Continued**

[All figures are estimates based on a sample—money amounts are in thousands of dollars]

Selected country of incorporation of Controlled Foreign Corporation	Controlled Foreign Corporations					Distributions out of earnings and profits Total	
	Income taxes	Current earnings and profits (less deficit) after income taxes	Foreign corporations with current earnings and profits (+) before income taxes				
			Current earnings and profits before income taxes	Income taxes	Current earnings and profits after income taxes		
	(7)	(8)	(9)	(10)	(11)	(12)	
Australia	3,972,742	19,700,357	27,407,693	3,958,287	23,449,406	9,158,654	
New Zealand	267,993	650,959	1,204,739	264,808	939,931	514,441	
Other countries of Oceania	56,247	881,591	1,006,280	56,066	950,214	943,505	
<b>Puerto Rico and U.S. Possessions, total</b>	<b>276,718</b>	<b>6,179,665</b>	<b>6,792,959</b>	<b>277,310</b>	<b>6,515,649</b>	<b>521,294</b>	
Puerto Rico	261,458	6,151,947	6,639,463	261,853	6,377,610	471,492	
U.S. Possessions, total	15,260	27,718	153,496	15,457	138,039	49,802	
Virgin Islands, U.S.	10,981	-23,731	91,953	11,075	80,878	38,842	
Other U.S. Possessions	4,279	51,449	61,542	4,382	57,160	* 10,959	
<b>OPEC countries, total (countries included above)</b>	<b>4,069,971</b>	<b>6,833,668</b>	<b>11,399,530</b>	<b>4,047,289</b>	<b>7,352,241</b>	<b>3,815,167</b>	

Footnotes at end of table.

## Controlled Foreign Corporations, 2008

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**Table 2. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, Subpart F Income, and Related Party Transactions, by Selected Country of Incorporation of Controlled Foreign Corporation, Tax Year 2008—Continued**

[All figures are estimates based on a sample—money amounts are in thousands of dollars]

Selected country of incorporation of Controlled Foreign Corporation	Controlled Foreign Corporations					
	Distributions out of earnings and profits—continued		Dividends paid to controlling U.S. corporation	Total Subpart F income	Receipts by foreign corporations from	
	Not previously taxed earnings and profits	Previously taxed earnings and profits			All sources	All related parties, total
	(13)	(14)	(15)	(16)	(17)	(18)
<b>All geographic regions</b>						
<b>Latin America, total</b>	<b>264,607,544</b>	<b>105,365,987</b>	<b>96,741,710</b>	<b>80,355,541</b>	<b>6,001,292,612</b>	<b>1,674,484,572</b>
Mexico	19,867,880	3,742,488	7,821,537	4,091,409	483,608,418	112,171,026
Central America and Caribbean countries, total	6,762,549	1,084,152	2,099,152	2,149,012	222,763,722	65,114,408
Costa Rica	1,175,518	838,765	496,713	404,719	31,348,199	9,453,216
Dominican Republic	142,741	106,859	49,115	67,728	6,956,572	2,178,088
El Salvador	65,188	* 13,397	* 20,720	* 15,577	968,812	155,343
Guatemala	28,795	* 5,060	15,634	15,211	3,806,439	936,522
Honduras	333,390	25,592	20,894	8,557	5,396,145	886,926
Panama (including Canal Zone)	55,327	* 4,951	* 48,304	39,759	2,768,653	1,411,449
Other Central American and Caribbean countries	521,198	677,985	330,844	249,694	10,528,299	3,744,421
South America, total	28,879	* 4,920	* 11,201	* 8,193	923,279	140,466
Argentina	11,929,813	1,819,571	5,225,672	1,537,678	229,496,497	37,603,403
Bolivia	1,449,397	57,883	523,299	92,062	31,943,377	7,712,090
Brazil	* 12,941	* 1,760	* 8,650	* 2,814	892,692	238,917
Chile	6,493,418	1,038,079	2,426,144	1,030,643	123,356,678	19,103,740
Colombia	1,675,874	245,464	1,069,835	121,980	20,868,007	3,607,608
Ecuador	503,308	103,428	337,214	43,404	15,908,380	1,860,016
Peru	580,585	75,706	* 9,351	29,392	4,818	3,504,105
Uruguay	32,720	* 19,618	* 16,200	77,936	3,682,864	782,459
Venezuela	33,337,168	40,564	249,953	92,012	18,959,471	1,010,065
Other South American countries	* 8,466	* 6,250	* 2,674	* 7,356	2,632,614	1,021,265
<b>Other Western Hemisphere, total</b>	<b>70,439,679</b>	<b>30,532,261</b>	<b>36,749,666</b>	<b>16,810,823</b>	<b>1,292,605,484</b>	<b>368,547,309</b>
Bahamas	10,906,874	1,266,339	9,192,562	1,088,424	52,340,369	15,229,224
Barbados	133,451	224,863	* 109,020	94,860	3,835,368	875,720
Bermuda	20,279,387	1,034,316	6,447,286	6,275,458	312,487,313	91,622,567
British Virgin Islands	27,878,828	7,468,722	13,046,800	3,084,492	627,899,351	168,025,786
Cayman Islands	10,112,797	6,816,707	6,864,013	4,918,755	250,660,307	75,052,856
Jamaica	* 5,529	* 28,576	0	* 283	1,499,234	84,643
Netherland Antilles	* 43,912	709,140	* 40,204	434,342	7,594,501	1,891,565
Trinidad and Tobago	* 28,059	0	* 16,365	* 2,149	670,775	43,716
Other Western Hemisphere countries	16,527	* 17,530	* 10,255	33,471	1,231,281	172,757
<b>Europe, total</b>	<b>132,816,468</b>	<b>60,352,337</b>	<b>38,727,141</b>	<b>47,241,273</b>	<b>3,033,576,522</b>	<b>884,672,057</b>
European Union, total	116,382,637	54,360,496	32,205,606	41,745,576	2,635,200,438	745,316,272
Austria	1,359,532	194,270	356,938	333,167	18,398,209	5,224,953
Belgium	3,155,386	410,000	1,779,474	478,315	69,673,618	30,912,251
Bulgaria	* 34,264	* 657	* 32,964	* 472	809,902	266,170
Cyprus	79,262	* 34,932	* 34,222	43,095	3,033,676	503,246
Czech Republic	402,375	157,019	253,405	43,187	19,550,305	5,294,429
Denmark	702,877	194,677	270,026	78,589	23,318,302	4,848,093
Estonia	* 9,145	0	* 363	* 5,377	709,497	310,979
Finland	242,449	67,707	69,387	62,193	8,925,141	1,637,232
France (including Corsica, Guadeloupe, Martinique, and Reunion)	6,277,389	1,116,096	1,366,567	1,940,024	170,021,913	46,341,629
Germany	10,758,304	2,102,071	1,467,428	1,656,711	262,917,398	77,053,397
Greece	193,912	* 63,505	27,749	61,226	9,528,829	553,475
Hungary	2,800,053	545,735	59,626	407,829	18,276,130	7,118,984
Ireland	5,547,096	7,854,095	1,184,753	11,317,164	226,920,124	85,566,440
Italy	4,984,728	859,645	1,058,600	943,827	81,820,648	13,807,248
Latvia	8,746	* 2,731	* 4,245	* 1,763	574,018	121,875
Lithuania	65,857	* 43	* 8,699	* 581	903,657	339,436
Luxembourg	7,970,089	9,643,916	5,458,157	4,684,126	271,013,325	58,901,735
Malta	* 2,394	* 83	* 990	* 20,852	718,139	* 116,016
Netherlands	34,689,157	19,041,914	8,390,855	6,711,143	425,599,030	150,247,412

Footnotes at end of table.

## Controlled Foreign Corporations, 2008

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**Table 2. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, Subpart F Income, and Related Party Transactions, by Selected Country of Incorporation of Controlled Foreign Corporation, Tax Year 2008—Continued**

[All figures are estimates based on a sample—money amounts are in thousands of dollars]

Selected country of incorporation of Controlled Foreign Corporation	Controlled Foreign Corporations				
	Distributions out of earnings and profits—continued		Dividends paid to controlling U.S. corporation	Total Subpart F income	Receipts by foreign corporations from
	Not previously taxed earnings and profits	Previously taxed earnings and profits			All sources
	(13)	(14)	(15)	(16)	(17)
					(18)
Poland	1,344,209	130,969	721,145	192,439	38,548,275
Portugal (including Azores)	632,273	234,812	77,136	1,926,324	15,702,627
Romania	160,661	* 2,894	* 20,605	21,198	8,201,252
Slovakia	136,740	* 602	63,664	6,185	4,761,532
Slovenia	* 21,354	* 17,154	* 1,973	* 15,602	1,249,313
Spain (including Canary Isles)	6,672,397	1,028,943	4,409,831	752,077	181,753,636
Sweden	976,903	153,195	266,141	339,877	50,538,470
United Kingdom and Northern Ireland (including Gibraltar)	27,155,083	10,502,833	4,820,662	9,702,236	721,733,470
Other European countries, total	16,433,831	5,991,840	6,521,535	5,495,698	398,376,083
Croatia	15,766	* 50	* 11,194	* 930	1,067,575
Guernsey	* 27,051	301,469	* 5,608	18,259	1,267,605
Jersey	96,499	* 139,118	* 25,150	363,956	4,486,115
Norway	1,370,016	269,830	1,050,098	169,555	21,900,588
Russia	1,065,604	* 22,968	108,704	40,014	34,268,105
Serbia	* 39,116	* 3,837	* 7,588	* 2,201	1,015,903
Switzerland	12,440,945	5,194,942	4,226,515	4,745,273	324,325,636
Ukraine	336,042	* 1,206	* 53,485	* 4,538	6,036,406
Other European countries	1,042,791	58,420	* 1,033,193	150,973	4,008,150
<b>Africa, total</b>	<b>2,950,787</b>	<b>506,396</b>	<b>2,241,051</b>	<b>556,743</b>	<b>47,938,317</b>
North Africa, total	125,479	* 5,695	27,248	4,657	7,065,615
Egypt	66,129	* 4,955	* 18,453	* 2,741	4,381,904
Morocco	35,331	* 740	* 3,300	* 850	1,558,893
Other North African countries	* 24,020	0	* 5,494	* 1,067	1,124,818
East Africa, total	720,894	321,653	629,554	414,459	5,869,099
Mauritius	705,790	321,596	615,514	414,392	4,968,531
Other East African countries	* 15,104	* 56	* 14,040	* 66	900,568
West and Central Africa, total	1,393,951	* 57,273	1,353,002	18,596	11,088,909
Liberia	* 115,538	* 53,454	* 115,533	* 8,140	2,415,126
Nigeria	1,265,338	* 2,479	* 1,232,432	* 9,999	6,994,715
Other West and Central African countries	13,075	* 1,339	* 5,037	* 457	1,679,069
Southern Africa, total	710,463	121,775	231,248	119,032	23,914,693
South Africa	699,971	120,056	227,709	116,015	22,516,696
Other Southern African countries	10,492	* 1,719	* 3,539	* 3,017	1,397,997
<b>Asia, total</b>	<b>29,927,698</b>	<b>7,699,643</b>	<b>8,007,152</b>	<b>9,034,454</b>	<b>943,783,025</b>
Central, Northern, and Southwestern Asia, total	977,859	260,279	327,186	1,356,093	32,675,995
Kazakhstan	* 129,704	* 649	* 26,030	* 1,296	2,224,744
Turkey	832,014	258,655	286,087	1,354,249	29,947,814
Other Central, Northern, and Southwestern Asian countries	* 16,141	* 974	* 15,069	* 549	503,436
Middle East, total	696,826	98,773	111,477	347,194	31,949,245
Israel	437,947	* 26,462	65,555	223,169	18,566,851
Saudi Arabia	87,815	* 7,392	* 18,696	* 2,759	2,675,037
United Arab Emirates	123,574	* 57,820	* 20,728	116,818	8,884,403
Other Middle East countries	47,491	* 7,100	* 6,499	4,448	1,822,953
Southern and Southeastern Asia, total	11,049,141	3,117,663	2,611,269	2,162,999	281,430,038
India	1,009,046	53,832	537,476	180,305	45,759,896
Indonesia	1,495,175	37,239	213,567	106,876	19,884,514
Malaysia	507,130	280,199	199,653	112,964	28,249,795
Pakistan	57,934	* 3,180	* 17,388	* 3,454	1,326,812
Philippines	453,352	37,757	242,910	84,265	16,728,113
Singapore	6,708,139	2,487,704	844,955	1,338,077	136,468,290
Thailand	744,185	209,379	551,551	334,009	30,820,484
Vietnam	* 60,165	* 4,181	* 101	* 1,963	1,455,243
Other Southern and Southeastern Asian countries	14,016	* 4,192	* 3,667	* 1,087	736,892

Footnotes at end of table.

## Controlled Foreign Corporations, 2008

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**Table 2. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, Subpart F Income, and Related Party Transactions, by Selected Country of Incorporation of Controlled Foreign Corporation, Tax Year 2008—Continued**

[All figures are estimates based on a sample—money amounts are in thousands of dollars]

Selected country of incorporation of Controlled Foreign Corporation	Controlled Foreign Corporations				
	Distributions out of earnings and profits—continued		Dividends paid to controlling U.S. corporation	Total Subpart F income	Receipts by foreign corporations from
	Not previously taxed earnings and profits	Previously taxed earnings and profits			All related parties, total
	(13)	(14)	(15)	(16)	(17)
Australia	7,773,076	1,385,578	2,831,545	1,936,790	157,852,324
New Zealand	436,791	77,650	133,942	229,470	11,397,006
Other countries of Oceania	14,722	928,782	* 7,134	166,513	1,122,961
<b>Puerto Rico and U.S. Possessions, total</b>	<b>380,442</b>	<b>140,852</b>	<b>222,542</b>	<b>288,067</b>	<b>29,408,556</b>
Puerto Rico	345,211	126,281	197,095	272,655	27,736,448
U.S. Possessions, total	35,231	* 14,571	25,447	15,412	1,672,107
Virgin Islands, U.S.	* 26,452	* 12,390	* 16,669	* 12,959	878,423
Other U.S. Possessions	* 8,779	* 2,181	* 8,778	* 2,453	793,684
<b>OPEC countries, total (countries included above)</b>	<b>3,660,322</b>	<b>154,845</b>	<b>1,770,717</b>	<b>334,482</b>	<b>62,095,391</b>
					<b>13,468,239</b>

Footnotes at end of table.

## Controlled Foreign Corporations, 2008

Statistics of Income Bulletin | Winter 2013

**Table 2. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, Subpart F Income, and Related Party Transactions, by Selected Country of Incorporation of Controlled Foreign Corporation, Tax Year 2008—Continued**

[All figures are estimates based on a sample—money amounts are in thousands of dollars]

Selected country of incorporation of Controlled Foreign Corporation	Controlled Foreign Corporations					Payments by foreign corporations to All recipients	
	Receipts by foreign corporations from—continued				All other related parties		
	U.S. corporation filing return	Domestic corporations controlled by U.S. corporation filing return	Any foreign corporations controlled by U.S. corporation filing return	Unrelated parties			
	(19)	(20)	(21)	(22)	(23)	(24)	
<b>All geographic regions</b>	<b>248,918,233</b>	<b>324,599,686</b>	<b>1,084,373,575</b>	<b>16,593,078</b>	<b>4,393,254,786</b>	<b>5,718,101,389</b>	
<b>Latin America, total</b>	<b>24,126,814</b>	<b>18,041,892</b>	<b>64,689,483</b>	<b>5,312,837</b>	<b>374,505,480</b>	<b>465,462,705</b>	
Mexico	15,246,340	12,503,110	32,064,149	5,300,808	160,006,917	216,001,376	
Central America and Caribbean countries, total	1,374,159	1,280,280	6,789,181	* 9,596	22,006,584	29,831,154	
Costa Rica	732,834	314,804	1,121,668	* 8,782	4,784,838	6,533,207	
Dominican Republic	65,091	40,756	49,496	0	814,102	943,005	
El Salvador	131,379	48,833	756,311	0	2,874,394	3,661,076	
Guatemala	55,713	35,538	795,675	0	4,528,303	5,335,859	
Honduras	352,055	274,348	785,046	0	1,357,405	2,742,279	
Panama (including Canal Zone)	32,761	541,769	3,169,077	* 814	6,864,072	9,660,424	
Other Central American and Caribbean countries	* 4,327	24,231	111,909	0	783,471	955,304	
South America, total	7,506,315	4,258,502	25,836,153	2,433	192,491,980	219,630,175	
Argentina	3,404,195	575,538	3,731,127	* 1,230	24,241,750	30,789,110	
Bolivia	* 10,443	* 2,210	226,264	0	659,911	764,180	
Brazil	2,102,896	2,406,156	14,594,626	* 62	104,632,145	119,090,063	
Chile	555,126	661,628	2,390,686	* 168	17,387,713	20,336,663	
Colombia	84,244	259,183	1,516,449	* 141	14,055,148	15,185,410	
Ecuador	44,606	5,719	1,018,788	* 216	2,434,782	3,364,994	
Peru	662,565	86,827	448,123	* 398	6,612,119	7,221,133	
Uruguay	43,097	82,391	656,971	0	2,905,199	3,342,020	
Venezuela	182,948	116,308	710,591	* 218	17,951,862	17,001,686	
Other South American countries	* 416,195	* 62,541	542,529	0	1,611,349	2,534,917	
<b>Other Western Hemisphere, total</b>	<b>73,716,243</b>	<b>132,889,286</b>	<b>151,975,077</b>	<b>9,966,703</b>	<b>943,270,477</b>	<b>1,212,899,129</b>	
Bahamas	* 1,849,233	9,531,820	3,848,170	0	37,431,758	34,804,050	
Barbados	95,856	604,272	175,593	0	2,966,404	3,686,364	
Bermuda	12,768,522	34,808,799	44,045,124	* 122	222,408,802	271,882,487	
British Virgin Islands	3,352,091	4,377,940	7,817,785	* 662	19,377,195	28,883,859	
Canada	45,405,767	65,668,373	46,987,233	9,964,412	469,302,762	625,730,510	
Cayman Islands	10,040,693	17,513,173	47,497,483	* 1,507	182,473,354	237,980,675	
Jamaica	* 1,474	* 64,474	18,695	0	1,431,182	1,401,190	
Netherland Antilles	* 184,192	269,536	1,437,837	0	6,190,450	6,870,836	
Trinidad and Tobago	* 2,568	* 2,048	39,101	0	627,988	649,253	
Other Western Hemisphere countries	* 15,848	48,852	108,057	0	1,060,581	1,009,905	
<b>Europe, total</b>	<b>89,391,795</b>	<b>124,797,430</b>	<b>670,291,245</b>	<b>191,587</b>	<b>2,186,489,812</b>	<b>2,892,045,887</b>	
European Union, total	70,999,506	109,825,531	564,302,749	188,485	1,921,768,231	2,530,381,750	
Austria	1,261,851	469,159	3,493,943	0	13,733,210	18,774,138	
Belgium	1,169,988	3,374,687	26,365,637	* 1,939	42,356,665	69,007,703	
Bulgaria	* 17,019	* 4,438	244,714	0	544,304	793,721	
Cyprus	* 24,497	202,807	275,941	0	2,530,840	2,586,179	
Czech Republic	396,671	243,106	4,654,627	* 25	14,378,712	18,884,730	
Denmark	382,096	477,292	3,988,703	* 2	18,577,784	20,248,204	
Estonia	* 27,369	* 9,211	274,399	0	399,697	679,267	
Finland	86,017	264,005	1,287,210	0	7,298,609	8,590,019	
France (including Corsica, Guadeloupe, Martinique, and Reunion)	3,446,851	3,416,626	39,470,363	* 7,790	125,508,490	166,163,694	
Germany	5,256,104	6,474,308	65,288,370	34,615	187,159,393	259,719,609	
Greece	11,285	15,862	526,312	* 16	9,029,015	9,179,719	
Hungary	95,173	1,139,277	5,884,528	* 7	11,251,696	19,005,871	
Ireland	11,628,128	30,837,699	43,100,613	0	141,961,636	193,293,571	
Italy	882,029	776,868	12,145,455	* 2,895	68,508,831	82,236,278	
Latvia	* 672	* 4,544	116,659	0	453,000	623,694	
Lithuania	* 1,448	* 22,439	315,549	0	564,925	902,788	
Luxembourg	2,176,758	11,102,458	45,622,519	0	217,125,166	254,903,628	
Malta	* 685	* 2,203	* 113,128	0	620,570	718,903	
Netherlands	14,702,915	15,346,411	120,196,644	* 1,442	282,661,640	403,334,402	

Footnotes at end of table.

## Controlled Foreign Corporations, 2008

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**Table 2. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, Subpart F Income, and Related Party Transactions, by Selected Country of Incorporation of Controlled Foreign Corporation, Tax Year 2008—Continued**

[All figures are estimates based on a sample—money amounts are in thousands of dollars]

Selected country of incorporation of Controlled Foreign Corporation	Controlled Foreign Corporations					Payments by foreign corporations to	
	Receipts by foreign corporations from—continued				Unrelated parties		
	U.S. corporation filing return	Domestic corporations controlled by U.S. corporation filing return	Any foreign corporations controlled by U.S. corporation filing return	All other related parties			
	(19)	(20)	(21)	(22)	(23)	(24)	
Poland	369,260	409,655	8,064,004	* 530	29,735,485	36,905,045	
Portugal (including Azores)	71,542	167,258	2,812,132	0	12,676,821	13,933,769	
Romania	151,585	78,183	2,937,728	* 13,242	5,036,565	8,357,721	
Slovakia	* 27,402	52,828	1,665,379	0	3,141,239	4,716,941	
Slovenia	* 31,034	* 31,938	390,792	0	796,627	1,230,467	
Spain (including Canary Isles)	1,769,793	2,534,543	33,246,071	* 179	145,333,679	177,116,982	
Sweden	3,544,151	749,525	18,847,424	* 49,528	27,704,225	49,290,675	
United Kingdom and Northern Ireland (including Gibraltar)	23,467,184	31,618,199	122,973,906	76,273	552,679,405	709,184,031	
Other European countries, total	18,392,289	14,971,898	105,988,496	* 3,102	264,721,582	361,664,137	
Croatia	* 7,037	127,992	242,672	0	696,423	1,146,619	
Guernsey	0	* 93,292	719,142	0	455,235	979,874	
Jersey	* 114	250,974	720,997	0	3,514,768	2,913,162	
Norway	661,641	449,797	3,388,479	* 31	17,591,424	17,679,668	
Russia	396,045	240,266	9,569,172	* 211	24,222,484	32,985,435	
Serbia	* 9,726	* 7,222	87,137	0	912,441	987,741	
Switzerland	17,041,351	13,625,536	87,840,481	* 2,859	210,912,490	294,860,084	
Ukraine	56,358	86,009	1,201,173	0	4,696,668	5,910,650	
Other European countries	220,017	90,811	2,219,242	0	1,719,650	4,200,905	
<b>Africa, total</b>	<b>1,390,948</b>	<b>4,056,426</b>	<b>6,266,760</b>	<b>* 169</b>	<b>36,769,069</b>	<b>44,204,212</b>	
North Africa, total	11,148	118,740	1,550,776	0	5,452,856	6,626,028	
Egypt	* 4,684	56,426	778,975	0	3,553,099	4,116,065	
Morocco	* 6,320	* 25,389	644,698	0	937,046	1,455,215	
Other North African countries	* 144	* 36,925	127,103	0	962,711	1,054,747	
East Africa, total	63,187	655,119	1,261,021	* [2]	4,244,627	5,795,333	
Mauritius	59,111	576,436	941,902	* [2]	3,742,805	4,951,912	
Other East African countries	* 4,076	* 78,684	319,119	0	501,821	843,421	
West and Central Africa, total	1,037,098	2,703,434	877,410	0	6,473,858	8,538,151	
Liberia	* 214,554	* 232,986	* 132,396	0	1,835,988	1,912,010	
Nigeria	* 819,084	2,452,490	174,710	0	3,548,438	4,784,645	
Other West and Central African countries	* 3,461	17,957	570,304	0	1,089,431	1,841,496	
Southern Africa, total	279,515	579,133	2,577,552	* 169	20,597,729	23,244,701	
South Africa	265,564	579,109	2,166,355	* 169	19,619,039	21,858,093	
Other Southern African countries	* 13,951	* 24	411,197	0	978,690	1,386,608	
<b>Asia, total</b>	<b>48,196,565</b>	<b>40,626,612</b>	<b>167,970,524</b>	<b>1,043,333</b>	<b>690,737,500</b>	<b>916,750,621</b>	
Central, Northern, and Southwestern Asia, total	35,332	66,991	12,672,283	0	20,780,707	30,191,134	
Kazakhstan	* 69	* 974	42,371	0	2,181,639	1,452,812	
Turkey	31,180	65,573	12,611,847	0	18,117,848	28,379,926	
Other Central, Northern, and Southwestern Asian countries	* 4,082	* 444	* 18,065	0	481,221	358,396	
Middle East, total	3,531,507	1,347,030	2,993,565	0	24,182,723	31,962,484	
Israel	3,516,706	1,168,050	2,292,641	0	11,660,636	19,136,572	
Saudi Arabia	* 14	* 3,042	179,626	0	2,492,359	2,459,379	
United Arab Emirates	9,017	136,335	423,323	0	8,316,699	8,635,506	
Other Middle East countries	5,770	* 39,602	97,975	0	1,713,029	1,731,027	
Southern and Southeastern Asia, total	20,615,482	20,533,487	53,998,093	11,204	188,467,105	268,923,031	
India	4,937,263	5,366,088	5,128,916	* 5,273	30,787,429	42,404,143	
Indonesia	33,214	3,046,567	4,017,277	* 432	12,793,913	17,824,168	
Malaysia	4,300,954	1,802,844	5,715,422	* 1	16,462,042	27,059,199	
Pakistan	* 3,360	* 861	20,218	0	1,302,421	1,262,197	
Philippines	3,355,787	904,084	2,176,210	0	10,357,351	16,048,979	
Singapore	7,612,607	8,543,064	31,608,844	* 5,447	90,306,764	132,107,809	
Thailand	303,600	864,362	5,044,715	* 51	24,621,143	30,032,645	
Vietnam	52,189	* 3,703	261,689	0	1,141,770	1,484,082	
Other Southern and Southeastern Asian countries	* 16,509	* 1,913	24,802	0	694,271	699,809	

Footnotes at end of table.

## Controlled Foreign Corporations, 2008

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**Table 2. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, Subpart F Income, and Related Party Transactions, by Selected Country of Incorporation of Controlled Foreign Corporation, Tax Year 2008—Continued**

[All figures are estimates based on a sample—money amounts are in thousands of dollars]

Selected country of incorporation of Controlled Foreign Corporation	Controlled Foreign Corporations					Payments by foreign corporations to All recipients	
	Receipts by foreign corporations from—continued						
	U.S. corporation filing return	Domestic corporations controlled by U.S. corporation filing return	Any foreign corporations controlled by U.S. corporation filing return	All other related parties	Unrelated parties		
	(19)	(20)	(21)	(22)	(23)	(24)	
Australia	1,882,689	3,532,399	20,012,898	* 56,145	133,463,426	150,388,409	
New Zealand	82,919	111,018	1,345,333	0	9,990,679	11,123,147	
Other countries of Oceania	* 7,070	* 18,840	232,410	* 22,304	843,746	1,667,665	
<b>Puerto Rico and U.S. Possessions, total</b>	<b>10,123,189</b>	<b>525,783</b>	<b>1,589,847</b>	<b>0</b>	<b>17,184,595</b>	<b>23,559,613</b>	
Puerto Rico	10,118,700	514,314	1,559,377	0	15,558,514	21,880,176	
U.S. Possessions, total	* 4,489	11,469	30,470	0	1,626,081	1,679,437	
Virgin Islands, U.S.	* 4,053	* 10,910	25,008	0	838,735	930,522	
Other U.S. Possessions	* 436	* 559	* 5,462	0	787,346	748,915	
<b>OPEC countries, total (countries included above)</b>	<b>1,097,096</b>	<b>5,761,613</b>	<b>6,608,663</b>	<b>* 866</b>	<b>48,644,913</b>	<b>55,137,681</b>	

Footnotes at end of table.

## Controlled Foreign Corporations, 2008

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**Table 2. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, Subpart F Income, and Related Party Transactions, by Selected Country of Incorporation of Controlled Foreign Corporation, Tax Year 2008—Continued**

[All figures are estimates based on a sample—money amounts are in thousands of dollars]

Selected country of incorporation of Controlled Foreign Corporation	Controlled Foreign Corporations					
	Payments by foreign corporations to—continued					
	All related parties, total	U.S. corporation filing return	Domestic corporations controlled by U.S. corporation filing return	Any foreign corporations controlled by U.S. corporation filing return	All other related parties	Unrelated parties
	(25)	(26)	(27)	(28)	(29)	(30)
<b>All geographic regions</b>	<b>1,764,995,872</b>	<b>317,415,339</b>	<b>419,468,613</b>	<b>1,016,021,340</b>	<b>12,090,580</b>	<b>3,977,213,228</b>
<b>Latin America, total</b>	<b>113,015,715</b>	<b>22,975,261</b>	<b>29,326,826</b>	<b>56,754,254</b>	<b>3,959,374</b>	<b>354,017,871</b>
Mexico	57,772,951	12,022,829	14,291,471	27,521,569	3,937,081	159,492,518
Central America and Caribbean countries, total	10,930,667	1,005,059	4,779,056	5,146,551	0	18,996,826
Costa Rica	1,453,300	283,129	382,047	788,123	0	5,081,503
Dominican Republic	248,790	98,853	68,926	81,011	0	694,215
El Salvador	1,512,898	61,538	644,110	807,250	0	2,148,813
Guatemala	1,693,321	156,202	572,949	964,170	0	3,735,277
Honduras	1,102,129	292,532	466,759	342,838	0	1,641,509
Panama (including Canal Zone)	4,692,485	83,338	2,622,317	1,986,830	0	4,967,939
Other Central American and Caribbean countries	227,744	29,465	21,948	176,331	0	727,570
South America, total	44,312,098	9,947,373	10,256,298	24,086,134	22,293	175,528,526
Argentina	5,170,144	1,190,708	1,037,047	2,939,152	* 3,237	25,647,706
Bolivia	56,206	* 3,944	14,542	28,669	* 9,051	716,152
Brazil	22,351,204	5,447,827	5,165,580	11,732,762	* 5,035	96,800,255
Chile	5,593,881	1,391,447	1,457,147	2,741,994	* 3,293	14,745,473
Colombia	2,937,189	597,936	636,425	1,702,449	* 379	12,277,918
Ecuador	817,649	87,403	169,846	559,914	* 487	2,560,288
Peru	2,000,163	426,399	768,109	805,650	* 4	5,264,772
Uruguay	1,002,483	123,527	241,247	637,655	* 54	2,351,677
Venezuela	4,127,839	632,654	747,247	2,747,186	* 752	12,881,128
Other South American countries	255,339	45,528	19,108	190,703	0	2,283,157
<b>Other Western Hemisphere, total</b>	<b>354,887,263</b>	<b>67,816,911</b>	<b>114,268,763</b>	<b>165,469,331</b>	<b>7,332,258</b>	<b>862,775,440</b>
Bahamas	18,686,460	992,327	14,556,821	3,137,312	0	16,306,204
Barbados	760,508	130,484	277,154	352,869	0	2,937,690
Bermuda	86,176,118	13,510,818	28,608,966	44,055,693	* 640	186,576,522
British Virgin Islands	16,611,658	3,994,582	5,915,464	6,700,941	* 671	12,309,525
Canada	149,689,704	37,820,170	42,911,593	61,627,470	7,330,471	479,409,968
Cayman Islands	79,556,691	10,978,676	20,358,861	48,218,809	* 344	158,706,139
Jamaica	155,491	* 62,415	30,605	62,471	0	1,245,699
Netherland Antilles	2,666,217	147,352	1,348,733	1,170,131	0	4,204,620
Trinidad and Tobago	177,080	* 73,700	83,205	20,175	0	476,405
Other Western Hemisphere countries	407,338	106,385	177,360	123,460	* 132	602,668
<b>Europe, total</b>	<b>946,811,616</b>	<b>158,792,511</b>	<b>184,383,209</b>	<b>603,013,350</b>	<b>622,546</b>	<b>1,960,757,834</b>
European Union, total	797,748,630	119,674,757	162,360,545	515,095,311	618,017	1,746,466,308
Austria	6,037,480	1,043,217	1,041,261	3,953,003	0	12,767,420
Belgium	31,020,437	4,174,580	3,846,662	22,998,280	* 914	39,840,116
Bulgaria	177,319	42,922	13,539	120,857	0	616,403
Cyprus	542,325	176,907	121,924	242,585	* 909	2,047,058
Czech Republic	3,832,326	228,801	610,121	2,993,404	0	15,118,128
Denmark	5,672,815	469,245	1,055,677	4,147,006	* 886	14,582,717
Estonia	178,799	2,699	10,582	165,517	0	500,469
Finland	2,690,786	291,570	216,732	2,180,658	* 1,826	5,900,317
France (including Corsica, Guadeloupe, Martinique, and Reunion)	47,926,812	5,109,958	4,833,757	37,963,216	19,880	118,524,885
Germany	81,644,847	7,221,886	8,699,413	65,297,976	* 425,572	178,561,993
Greece	2,555,283	58,700	136,149	2,359,333	* 1,100	6,628,503
Hungary	7,684,050	154,419	768,321	6,761,171	* 140	11,374,526
Ireland	78,167,317	23,312,582	15,860,011	38,994,724	0	115,916,554
Italy	23,086,745	2,697,181	1,831,592	18,545,353	* 12,619	59,199,638
Latvia	179,746	* 6,848	32,920	139,978	0	443,948
Lithuania	485,121	* 2,877	* 16,234	466,010	0	423,989
Luxembourg	66,753,766	9,212,830	26,683,700	30,855,791	* 1,446	188,343,529
Malta	122,125	* 400	* 4,640	117,085	0	609,458
Netherlands	163,648,758	36,507,349	27,720,277	99,386,005	* 35,127	241,061,655

Footnotes at end of table.

## Controlled Foreign Corporations, 2008

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**Table 2. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, Subpart F Income, and Related Party Transactions, by Selected Country of Incorporation of Controlled Foreign Corporation, Tax Year 2008—Continued**

[All figures are estimates based on a sample—money amounts are in thousands of dollars]

Selected country of incorporation of Controlled Foreign Corporation	Controlled Foreign Corporations					
	Payments by foreign corporations to—continued					
	All related parties, total	U.S. corporation filing return	Domestic corporations controlled by U.S. corporation filing return	Any foreign corporations controlled by U.S. corporation filing return	All other related parties	Unrelated parties
	(25)	(26)	(27)	(28)	(29)	(30)
Poland	9,583,025	756,894	1,609,810	7,213,378	* 2,943	27,353,267
Portugal (including Azores)	4,110,629	191,093	384,774	3,534,763	0	9,840,243
Romania	2,509,514	99,003	150,122	2,260,213	* 175	5,904,590
Slovakia	1,213,096	23,607	108,271	1,081,218	0	3,542,310
Slovenia	468,733	77,552	17,912	373,269	0	761,734
Spain (including Canary Isles)	50,973,431	2,652,108	7,646,618	40,667,444	* 7,261	126,365,421
Sweden	11,456,199	1,151,583	937,048	9,342,133	* 25,434	37,948,417
United Kingdom and Northern Ireland (including Gibraltar)	195,027,147	24,007,945	58,002,476	112,934,942	81,784	522,289,019
Other European countries, total	149,062,986	39,117,754	22,022,664	87,918,038	* 4,529	214,291,526
Croatia	243,466	10,353	30,080	203,032	0	903,153
Guernsey	553,047	* 5,442	* 98,332	449,273	0	426,905
Jersey	1,330,790	* 38,307	291,540	1,000,944	0	1,583,285
Norway	5,202,522	1,857,008	334,953	3,010,551	* 10	12,541,484
Russia	12,292,833	279,879	766,604	11,244,791	* 1,560	21,223,150
Serbia	175,665	* 4,260	* 11,265	160,141	0	812,076
Switzerland	125,393,941	35,399,786	20,165,496	69,825,700	* 2,959	170,434,590
Ukraine	1,656,619	39,792	212,802	1,404,025	0	4,254,465
Other European countries	2,214,102	1,482,929	111,593	619,580	0	2,112,418
<b>Africa, total</b>	<b>13,717,558</b>	<b>1,290,961</b>	<b>5,843,154</b>	<b>6,573,466</b>	<b>* 9,978</b>	<b>30,741,591</b>
North Africa, total	1,711,609	86,785	150,298	1,474,526	0	4,939,297
Egypt	1,032,022	54,173	83,702	894,147	0	3,086,847
Morocco	491,337	32,212	8,447	450,678	0	985,588
Other North African countries	188,250	* 400	58,148	129,702	0	866,863
East Africa, total	2,176,503	55,456	1,014,809	1,100,314	* 5,924	3,683,529
Mauritius	2,086,445	47,308	995,887	1,037,327	* 5,924	2,913,333
Other East African countries	90,057	8,148	18,922	62,987	0	770,197
West and Central Africa, total	2,372,122	225,652	1,603,217	543,253	0	6,176,849
Liberia	257,933	* 36,857	* 107,691	113,384	0	1,655,951
Nigeria	1,781,448	187,465	1,371,822	222,162	0	3,012,143
Other West and Central African countries	332,741	1,330	123,704	207,706	0	1,508,755
Southern Africa, total	7,457,325	923,068	3,074,829	3,455,374	* 4,054	15,941,915
South Africa	7,165,464	921,426	3,060,288	3,179,896	* 4,054	14,843,949
Other Southern African countries	291,861	1,642	14,541	275,677	0	1,097,967
<b>Asia, total</b>	<b>290,275,426</b>	<b>55,883,088</b>	<b>74,525,878</b>	<b>159,753,814</b>	<b>112,645</b>	<b>628,163,249</b>
Central, Northern, and Southwestern Asia, total	4,783,539	557,007	340,470	3,885,879	* 183	25,456,780
Kazakhstan	279,040	* 25,706	84,170	169,164	0	1,200,723
Turkey	4,462,960	519,723	243,561	3,699,677	0	23,939,200
Other Central, Northern, and Southwestern Asian countries	41,539	* 11,578	* 12,740	17,039	* 183	316,856
Middle East, total	5,143,503	826,801	931,041	3,385,460	* 201	26,893,552
Israel	2,402,012	659,925	326,710	1,415,176	* 201	16,758,493
Saudi Arabia	581,872	35,073	132,085	414,714	0	1,877,507
United Arab Emirates	1,880,230	123,636	361,484	1,395,109	0	6,797,532
Other Middle East countries	279,389	8,167	110,762	160,460	0	1,460,020
Southern and Southeastern Asia, total	88,404,730	20,687,741	18,682,293	49,011,511	23,186	181,174,159
India	6,603,103	1,253,906	1,822,591	3,522,212	* 4,394	35,996,592
Indonesia	6,519,170	257,911	363,541	5,896,290	* 1,428	11,313,879
Malaysia	12,837,301	2,210,691	4,199,783	6,423,141	* 3,685	14,276,615
Pakistan	269,861	30,189	59,919	179,753	0	992,500
Philippines	5,062,060	1,200,206	1,905,878	1,955,976	0	10,996,255
Singapore	51,338,479	15,152,186	9,116,746	27,060,711	* 8,836	81,095,153
Thailand	5,127,788	528,697	1,077,511	3,520,148	* 1,432	24,944,322
Vietnam	434,535	45,882	24,403	360,839	* 3,411	1,069,892
Other Southern and Southeastern Asian countries	212,435	8,073	111,922	92,441	0	488,951

Footnotes at end of table.

## Controlled Foreign Corporations, 2008

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**Table 2. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, Subpart F Income, and Related Party Transactions, by Selected Country of Incorporation of Controlled Foreign Corporation, Tax Year 2008—Continued**

[All figures are estimates based on a sample—money amounts are in thousands of dollars]

Selected country of incorporation of Controlled Foreign Corporation	Controlled Foreign Corporations					
	Payments by foreign corporations to—continued					
	All related parties, total	U.S. corporation filing return	Domestic corporations controlled by U.S. corporation filing return	Any foreign corporations controlled by U.S. corporation filing return	All other related parties	Unrelated parties
	(25)	(26)	(27)	(28)	(29)	(30)
Australia	33,470,479	5,998,265	6,709,428	20,757,598	* 5,187	117,205,196
New Zealand	3,215,911	310,035	309,848	2,595,825	* 203	7,913,469
Other countries of Oceania	1,056,819	850,036	44,550	118,192	* 44,041	610,846
<b>Puerto Rico and U.S. Possessions, total</b>	<b>8,545,084</b>	<b>3,498,270</b>	<b>4,056,958</b>	<b>985,509</b>	<b>* 4,347</b>	<b>15,027,732</b>
Puerto Rico	8,103,600	3,460,589	3,879,357	759,307	* 4,347	13,789,772
U.S. Possessions, total	441,484	37,681	177,601	226,202	0	1,237,960
Virgin Islands, U.S.	213,144	35,023	128,466	49,654	0	717,385
Other U.S. Possessions	228,341	* 2,657	49,135	176,548	0	520,575
<b>OPEC countries, total (countries included above)</b>	<b>15,954,317</b>	<b>1,325,557</b>	<b>3,230,468</b>	<b>11,395,624</b>	<b>* 2,667</b>	<b>39,271,225</b>

\* Data should be used with caution because of the small number of returns on which they are based.

[1] Number of returns is not additive because some U.S. corporations had Controlled Foreign Corporations in more than one country.

[2] Value is less than \$500.

NOTE: Detail may not add to totals because of rounding.

## Controlled Foreign Corporations, 2008

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**Table 3. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, and Subpart F Income, by Selected Country of Incorporation and Industrial Sector of Controlled Foreign Corporation, Tax Year 2008**

[All figures are estimates based on a sample—money amounts are in thousands of dollars]

Selected country of incorporation and industrial sector of Controlled Foreign Corporation	Number of U.S. corporation returns [1]	Number of foreign corporations	Controlled Foreign Corporations				
			Total assets		Total receipts	Current earnings and profits (less deficit) before income taxes	Income taxes
			Beginning of year	End of year			
(1)	(2)	(3)	(4)	(5)	(6)	(7)	
<b>All geographic regions</b>							
<b>All industries [2]</b>	<b>11,929</b>	<b>83,642</b>	<b>15,086,493,220</b>	<b>14,544,673,064</b>	<b>6,001,292,612</b>	<b>661,992,696</b>	<b>125,226,476</b>
Raw materials and energy production	417	2,572	455,114,985	459,218,983	264,091,528	86,026,173	30,810,777
Goods production	4,256	20,625	2,040,334,417	2,028,750,106	2,161,545,862	154,396,708	28,639,887
Distribution and transportation of goods	3,273	16,758	880,869,716	883,224,540	1,386,018,978	73,618,231	14,698,547
Information	945	5,066	344,091,645	338,916,808	172,341,418	24,021,218	4,608,140
Finance, insurance, real estate, and rental and leasing	1,663	10,192	7,433,487,559	6,748,568,576	694,703,129	55,940,822	17,810,920
Services	5,896	28,357	3,932,509,215	4,085,945,184	1,322,543,949	267,992,902	28,658,121
<b>Argentina</b>							
<b>All industries</b>	<b>575</b>	<b>868</b>	<b>25,135,563</b>	<b>25,729,670</b>	<b>31,943,377</b>	<b>2,628,273</b>	<b>984,667</b>
Raw materials and energy production	33	60	3,617,140	3,823,247	2,652,437	323,270	113,670
Goods production	141	192	7,018,144	7,796,877	11,779,115	1,042,177	352,776
Distribution and transportation of goods	152	167	5,757,897	5,025,918	12,126,452	488,793	264,872
Information	45	57	1,163,187	950,306	1,130,700	112,287	65,543
Finance, insurance, real estate, and rental and leasing	115	166	5,001,826	5,261,182	2,130,779	381,398	104,541
Services	161	226	2,577,369	2,872,139	2,123,893	280,348	83,265
<b>Australia</b>							
<b>All industries [2]</b>	<b>1,425</b>	<b>2,802</b>	<b>424,094,591</b>	<b>380,789,381</b>	<b>157,852,324</b>	<b>23,673,099</b>	<b>3,972,742</b>
Raw materials and energy production	d	d	d	d	d	d	d
Goods production	358	545	54,872,739	48,833,522	76,768,306	4,064,908	1,242,264
Distribution and transportation of goods	371	497	20,148,474	17,524,574	24,428,538	1,452,182	455,160
Information	114	246	18,283,925	14,819,222	4,044,390	407,110	75,793
Finance, insurance, real estate, and rental and leasing	122	334	187,468,965	163,079,031	20,471,948	8,767,140	397,972
Services	682	1,050	121,436,967	112,351,664	21,123,620	4,444,537	368,087
<b>Austria</b>							
<b>All industries</b>	<b>367</b>	<b>527</b>	<b>23,374,008</b>	<b>25,621,912</b>	<b>18,398,209</b>	<b>1,476,301</b>	<b>277,149</b>
Raw materials and energy production	5	7	* 236,298	* 249,749	* 133,877	* 8,238	* 2,011
Goods production	94	115	10,559,962	12,011,389	8,025,717	907,134	123,655
Distribution and transportation of goods	139	161	3,660,521	3,568,373	5,782,412	316,797	73,058
Information	29	45	697,399	1,084,445	599,891	46,188	6,797
Finance, insurance, real estate, and rental and leasing	23	33	2,249,364	2,275,663	396,135	114,244	7,675
Services	119	166	5,970,463	6,432,294	3,460,177	100,176	63,952
<b>Bahamas</b>							
<b>All industries</b>	<b>94</b>	<b>372</b>	<b>85,574,087</b>	<b>94,654,076</b>	<b>52,340,369</b>	<b>16,848,178</b>	<b>3,067,559</b>
Raw materials and energy production	14	199	17,944,203	24,326,729	8,326,811	3,999,077	938,114
Goods production	d	d	d	d	d	d	d
Distribution and transportation of goods	16	36	2,486,314	1,688,987	10,417,337	-27,621	* 22,816
Information	d	d	d	d	d	d	d
Finance, insurance, real estate, and rental and leasing	36	51	31,959,981	37,353,116	2,723,953	974,155	* 2,452
Services	38	68	24,409,437	21,329,706	25,296,012	10,046,330	2,081,261
<b>Belgium</b>							
<b>All industries</b>	<b>671</b>	<b>1,222</b>	<b>105,491,919</b>	<b>111,436,943</b>	<b>69,673,618</b>	<b>3,761,694</b>	<b>1,099,774</b>
Raw materials and energy production	6	6	* 94,868	* 112,829	* 128,810	* 11,744	* 2,961
Goods production	214	330	33,673,307	36,645,874	35,573,155	1,092,333	355,689
Distribution and transportation of goods	243	349	16,244,142	14,326,258	18,594,675	716,304	314,144
Information	38	68	8,157,205	9,379,081	2,522,487	142,481	19,592
Finance, insurance, real estate, and rental and leasing	59	88	21,925,953	23,485,223	2,420,237	621,872	107,141
Services	250	381	25,396,444	27,487,678	10,434,253	1,176,960	300,247

Footnotes at end of table.

# Controlled Foreign Corporations, 2008

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**Table 3. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, and Subpart F Income, by Selected Country of Incorporation and Industrial Sector of Controlled Foreign Corporation, Tax Year 2008—Continued**

[All figures are estimates based on a sample—money amounts are in thousands of dollars]

Selected country of incorporation and industrial sector of Controlled Foreign Corporation	Number of U.S. corporation returns [1]	Number of foreign corporations	Controlled Foreign Corporations				
			Total assets		Total receipts	Current earnings and profits (less deficit) before income taxes	Income taxes
			Beginning of year	End of year			
(1)	(2)	(3)	(4)	(5)	(6)	(7)	
<b>Bermuda</b>							
<b>All industries</b>	<b>435</b>	<b>1,008</b>	<b>880,540,139</b>	<b>841,173,421</b>	<b>312,487,313</b>	<b>68,587,299</b>	<b>10,088,314</b>
Raw materials and energy production	12	162	58,856,384	65,808,007	25,649,256	13,311,573	6,426,261
Goods production	38	44	90,095,152	109,147,314	84,241,613	20,094,548	434,105
Distribution and transportation of goods	41	50	19,811,528	19,857,423	53,002,333	2,006,146	124,790
Information	8	9	* 1,894,646	* 1,390,331	* 1,755,233	* -42,514	* 20,754
Finance, insurance, real estate, and rental and leasing	250	404	133,368,526	114,700,636	20,216,857	813,036	248,019
Services	178	339	576,513,902	530,269,709	127,622,022	32,404,511	2,834,385
<b>Brazil</b>							
<b>All industries [2]</b>	<b>1,043</b>	<b>1,789</b>	<b>207,329,552</b>	<b>134,116,863</b>	<b>123,356,678</b>	<b>12,972,410</b>	<b>4,087,319</b>
Raw materials and energy production	34	69	13,707,420	12,098,856	9,546,925	2,546,428	572,406
Goods production	349	514	49,660,148	47,363,002	64,569,313	5,687,809	1,545,484
Distribution and transportation of goods	275	362	17,340,729	18,581,839	23,619,628	754,545	469,354
Information	77	121	3,200,975	3,357,718	3,450,489	111,166	78,397
Finance, insurance, real estate, and rental and leasing	77	182	105,461,880	39,613,544	14,972,793	2,199,345	1,133,934
Services	391	537	17,956,392	13,098,964	7,197,530	1,673,558	287,739
<b>British Virgin Islands</b>							
<b>All industries [2]</b>	<b>278</b>	<b>419</b>	<b>50,228,624</b>	<b>57,203,719</b>	<b>34,386,984</b>	<b>7,875,626</b>	<b>743,036</b>
Raw materials and energy production	17	30	7,448,376	8,987,120	3,701,572	1,703,260	* 639,479
Goods production	38	44	13,964,971	18,474,142	23,096,972	5,470,725	* 3,509
Distribution and transportation of goods	33	37	629,808	661,425	1,183,542	-531	* 7,792
Information	d	d	d	d	d	d	d
Finance, insurance, real estate, and rental and leasing	48	65	4,646,787	5,694,872	512,973	93,112	39,343
Services	158	225	23,377,325	23,144,575	5,845,877	604,191	52,905
<b>Canada</b>							
<b>All industries [2]</b>	<b>3,695</b>	<b>6,829</b>	<b>1,126,532,342</b>	<b>960,207,182</b>	<b>627,899,351</b>	<b>47,696,271</b>	<b>12,099,817</b>
Raw materials and energy production	139	273	153,911,684	120,649,798	86,730,109	15,337,701	2,710,949
Goods production	1,141	1,645	277,847,994	232,102,399	238,296,474	6,058,430	3,831,575
Distribution and transportation of goods	1,175	1,573	98,601,072	94,941,367	191,838,683	7,362,293	2,287,469
Information	184	297	8,111,214	10,366,860	7,570,236	591,372	356,974
Finance, insurance, real estate, and rental and leasing	410	847	400,479,257	342,848,333	52,286,278	8,598,715	1,632,135
Services	1,367	2,186	187,579,613	159,297,103	51,173,320	9,743,520	1,280,716
<b>Cayman Islands</b>							
<b>All industries [2]</b>	<b>587</b>	<b>1,677</b>	<b>669,816,781</b>	<b>725,242,367</b>	<b>250,660,307</b>	<b>43,043,511</b>	<b>7,780,796</b>
Raw materials and energy production	35	196	41,521,407	55,515,850	29,351,909	12,088,035	4,181,805
Goods production	85	109	45,165,358	57,241,649	53,880,139	3,474,943	330,786
Distribution and transportation of goods	59	69	36,345,721	35,413,351	77,024,108	3,971,130	112,219
Information	d	d	d	d	d	d	d
Finance, insurance, real estate, and rental and leasing	232	833	402,152,338	385,761,042	56,638,173	1,899,903	1,624,293
Services	260	459	144,562,310	191,218,407	33,710,233	21,593,778	1,530,941
<b>Chile</b>							
<b>All industries [2]</b>	<b>451</b>	<b>746</b>	<b>40,006,180</b>	<b>36,350,384</b>	<b>20,868,007</b>	<b>2,818,230</b>	<b>495,121</b>
Raw materials and energy production	31	61	9,412,598	9,123,147	5,522,314	1,392,155	297,250
Goods production	107	125	3,794,473	3,383,600	4,153,396	417,557	38,778
Distribution and transportation of goods	169	203	3,178,464	3,065,351	5,384,597	223,817	46,042
Information	d	d	d	d	d	d	d
Finance, insurance, real estate, and rental and leasing	49	83	11,906,610	9,934,007	2,307,783	118,342	25,394
Services	139	233	9,012,793	8,697,333	2,060,036	547,373	78,637

Footnotes at end of table.

# Controlled Foreign Corporations, 2008

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**Table 3. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, and Subpart F Income, by Selected Country of Incorporation and Industrial Sector of Controlled Foreign Corporation, Tax Year 2008—Continued**

[All figures are estimates based on a sample—money amounts are in thousands of dollars]

Selected country of incorporation and industrial sector of Controlled Foreign Corporation	Number of U.S. corporation returns [1]	Controlled Foreign Corporations					
		Number of foreign corporations	Total assets		Total receipts	Current earnings and profits (less deficit) before income taxes	Income taxes
			Beginning of year	End of year			
(1)	(2)	(3)	(4)	(5)	(6)	(7)	
<b>China</b>							
<b>All industries [2]</b>	<b>2,188</b>	<b>4,546</b>	<b>100,958,245</b>	<b>126,366,421</b>	<b>125,372,807</b>	<b>8,745,655</b>	<b>1,467,953</b>
Raw materials and energy production	37	92	1,149,995	1,883,524	1,686,009	195,357	11,753
Goods production	1,152	2,218	52,698,633	63,024,485	71,062,531	3,677,108	737,555
Distribution and transportation of goods	505	825	13,210,131	18,161,994	30,306,647	1,455,376	346,413
Information	137	184	592,424	722,525	555,339	10,869	-968
Finance, insurance, real estate, and rental and leasing	73	118	18,157,153	19,346,191	2,107,075	269,868	97,787
Services	712	1,104	15,148,925	23,222,583	19,653,624	3,137,248	275,376
<b>Colombia</b>							
<b>All industries</b>	<b>292</b>	<b>456</b>	<b>17,755,026</b>	<b>19,846,619</b>	<b>15,908,380</b>	<b>1,585,256</b>	<b>470,884</b>
Raw materials and energy production	13	22	111,151	140,199	112,658	-14,240	* 2,048
Goods production	81	111	5,220,798	4,891,620	6,671,604	635,226	222,097
Distribution and transportation of goods	94	109	1,547,039	1,713,189	5,200,804	224,657	73,765
Information	38	46	149,197	147,545	196,023	18,338	6,422
Finance, insurance, real estate, and rental and leasing	29	59	10,136,270	12,371,748	3,082,656	657,082	152,863
Services	67	108	590,571	582,317	644,636	64,194	13,689
<b>Costa Rica</b>							
<b>All industries</b>	<b>331</b>	<b>450</b>	<b>7,389,395</b>	<b>9,242,789</b>	<b>6,956,572</b>	<b>689,777</b>	<b>139,656</b>
Raw materials and energy production	9	25	714,411	810,779	1,007,152	49,246	17,491
Goods production	106	119	1,991,895	2,180,852	2,366,783	200,883	29,562
Distribution and transportation of goods	50	61	734,381	863,754	2,258,049	191,228	47,463
Information	13	16	55,109	71,217	112,461	16,723	* 11,837
Finance, insurance, real estate, and rental and leasing	19	53	3,302,963	4,489,260	818,910	199,540	28,403
Services	165	176	590,636	826,927	393,217	32,156	4,901
<b>Czech Republic</b>							
<b>All industries</b>	<b>382</b>	<b>581</b>	<b>26,731,197</b>	<b>20,651,512</b>	<b>19,550,305</b>	<b>1,346,144</b>	<b>308,105</b>
Raw materials and energy production	d	d	d	d	d	d	d
Goods production	139	193	7,084,479	6,765,257	10,874,304	692,405	152,875
Distribution and transportation of goods	118	146	1,705,027	1,593,542	3,172,338	133,183	56,584
Information	d	d	d	d	d	d	d
Finance, insurance, real estate, and rental and leasing	23	39	15,076,390	9,492,388	3,226,791	390,329	71,534
Services	118	164	1,663,967	1,660,903	1,804,060	103,204	23,587
<b>Denmark</b>							
<b>All industries</b>	<b>429</b>	<b>693</b>	<b>37,210,893</b>	<b>44,507,017</b>	<b>23,318,302</b>	<b>2,103,187</b>	<b>380,019</b>
Raw materials and energy production	9	9	* 78,381	* 106,257	* 169,426	* 29,808	* 6,957
Goods production	111	141	14,950,513	12,031,670	8,089,496	714,030	92,891
Distribution and transportation of goods	156	195	3,426,781	3,113,286	5,242,260	183,000	63,894
Information	30	37	233,678	647,192	323,739	-1,887	2,423
Finance, insurance, real estate, and rental and leasing	28	43	3,562,961	4,050,837	971,236	219,274	23,376
Services	165	268	14,958,579	24,557,775	8,522,145	958,962	190,478
<b>Finland</b>							
<b>All industries</b>	<b>260</b>	<b>385</b>	<b>12,854,933</b>	<b>14,606,623</b>	<b>8,925,141</b>	<b>395,513</b>	<b>119,286</b>
Raw materials and energy production	0	0	0	0	0	0	0
Goods production	70	92	3,070,119	3,256,793	3,424,157	208,369	54,301
Distribution and transportation of goods	91	106	2,032,269	1,706,743	3,091,587	101,137	14,191
Information	18	28	121,694	171,462	160,214	682	1,763
Finance, insurance, real estate, and rental and leasing	16	25	2,665,691	3,715,675	391,667	17,671	9,235
Services	87	134	4,965,160	5,755,950	1,857,518	67,654	39,795

Footnotes at end of table.

# Controlled Foreign Corporations, 2008

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**Table 3. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, and Subpart F Income, by Selected Country of Incorporation and Industrial Sector of Controlled Foreign Corporation, Tax Year 2008—Continued**

[All figures are estimates based on a sample—money amounts are in thousands of dollars]

Selected country of incorporation and industrial sector of Controlled Foreign Corporation	Number of U.S. corporation returns [1]	Controlled Foreign Corporations					
		Number of foreign corporations	Total assets		Total receipts	Current earnings and profits (less deficit) before income taxes	Income taxes
			Beginning of year	End of year			
(1)	(2)	(3)	(4)	(5)	(6)	(7)	
<b>France (incl. Corsica, Guadeloupe, Martinique, and Reunion)</b>							
<b>All industries [2]</b>	<b>1,459</b>	<b>3,522</b>	<b>313,037,160</b>	<b>308,582,059</b>	<b>170,021,913</b>	<b>14,379,780</b>	<b>3,171,200</b>
Raw materials and energy production	d	d	d	d	d	d	d
Goods production	515	973	74,452,792	68,475,256	79,471,266	4,446,860	980,865
Distribution and transportation of goods	441	659	21,503,114	21,107,594	30,716,868	1,238,506	423,747
Information	105	224	10,587,456	10,165,922	4,519,863	201,110	123,481
Finance, insurance, real estate, and rental and leasing	91	222	100,360,897	107,012,666	12,190,155	3,484,039	536,108
Services	630	1,418	105,212,616	100,752,115	42,150,599	4,975,478	1,102,169
<b>Germany</b>							
<b>All industries [2]</b>	<b>1,874</b>	<b>4,094</b>	<b>481,934,674</b>	<b>522,535,957</b>	<b>262,917,398</b>	<b>15,713,817</b>	<b>3,524,147</b>
Raw materials and energy production	13	18	522,894	614,186	659,740	89,181	16,908
Goods production	612	1,115	118,926,365	114,197,186	140,089,683	4,509,799	1,619,602
Distribution and transportation of goods	620	882	52,004,179	51,057,546	57,074,574	2,716,107	622,525
Information	120	238	5,787,024	5,554,642	5,252,800	578,974	146,033
Finance, insurance, real estate, and rental and leasing	135	290	99,598,596	136,535,204	14,308,879	2,215,056	480,613
Services	840	1,546	205,095,439	214,577,043	45,531,717	5,604,727	638,466
<b>Greece</b>							
<b>All industries</b>	<b>184</b>	<b>264</b>	<b>8,528,636</b>	<b>8,438,610</b>	<b>9,528,829</b>	<b>612,276</b>	<b>242,022</b>
Raw materials and energy production	4	5	* 31,624	* 30,701	* 44,480	* 618	* 779
Goods production	47	55	2,747,882	2,644,438	4,456,962	196,480	78,019
Distribution and transportation of goods	72	83	2,828,597	2,961,487	4,006,858	271,400	109,554
Information	15	24	750,222	508,586	238,911	-7,086	2,729
Finance, insurance, real estate, and rental and leasing	7	13	1,046,315	1,105,087	249,336	86,452	29,154
Services	49	84	1,123,996	1,188,311	532,283	64,412	21,787
<b>Hong Kong</b>							
<b>All industries [2]</b>	<b>1,461</b>	<b>2,368</b>	<b>217,070,002</b>	<b>139,476,844</b>	<b>71,058,898</b>	<b>8,325,434</b>	<b>1,066,849</b>
Raw materials and energy production	d	d	d	d	d	d	d
Goods production	258	337	7,823,743	8,711,821	13,009,810	730,166	139,069
Distribution and transportation of goods	474	625	15,325,649	15,051,725	24,564,363	1,845,079	237,393
Information	72	112	1,120,220	1,060,544	540,265	12,695	7,579
Finance, insurance, real estate, and rental and leasing	109	238	74,328,838	60,210,168	13,589,701	2,408,525	395,210
Services	738	1,039	114,854,857	50,430,029	17,553,703	2,755,704	234,830
<b>Hungary</b>							
<b>All industries</b>	<b>310</b>	<b>449</b>	<b>37,826,489</b>	<b>36,010,547</b>	<b>18,276,130</b>	<b>1,941,579</b>	<b>248,342</b>
Raw materials and energy production	8	8	* 389,361	* 399,312	* 86,386	* 8,236	* 1,841
Goods production	94	107	16,121,826	15,335,490	10,363,086	1,159,837	113,528
Distribution and transportation of goods	98	110	2,035,158	2,098,422	3,090,005	225,752	37,161
Information	23	42	1,511,118	1,702,867	758,233	46,482	6,850
Finance, insurance, real estate, and rental and leasing	27	43	12,598,302	11,203,168	1,549,141	274,712	41,914
Services	94	139	5,170,724	5,271,289	2,429,280	243,031	47,048
<b>India</b>							
<b>All industries</b>	<b>1,478</b>	<b>2,094</b>	<b>40,145,754</b>	<b>37,901,794</b>	<b>45,759,896</b>	<b>4,766,296</b>	<b>1,195,180</b>
Raw materials and energy production	16	21	339,644	276,434	320,460	94,895	* 29,521
Goods production	357	484	12,802,008	13,257,015	14,843,246	1,514,033	503,907
Distribution and transportation of goods	207	247	3,477,133	3,206,894	6,945,926	229,992	139,109
Information	123	158	2,977,262	3,501,581	3,379,657	639,240	115,899
Finance, insurance, real estate, and rental and leasing	79	135	10,756,623	6,532,894	2,744,240	545,060	111,478
Services	840	1,050	9,793,083	11,126,977	17,526,367	1,743,076	295,266

Footnotes at end of table.

## Controlled Foreign Corporations, 2008

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**Table 3. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, and Subpart F Income, by Selected Country of Incorporation and Industrial Sector of Controlled Foreign Corporation, Tax Year 2008—Continued**

[All figures are estimates based on a sample—money amounts are in thousands of dollars]

Selected country of incorporation and industrial sector of Controlled Foreign Corporation	Number of U.S. corporation returns [1]	Number of foreign corporations	Controlled Foreign Corporations				
			Total assets		Total receipts	Current earnings and profits (less deficit) before income taxes	Income taxes
			Beginning of year	End of year			
(1)	(2)	(3)	(4)	(5)	(6)	(7)	
<b>Indonesia</b>							
<b>All industries</b>	<b>230</b>	<b>359</b>	<b>16,094,005</b>	<b>21,391,834</b>	<b>19,884,514</b>	<b>3,516,193</b>	<b>1,276,432</b>
Raw materials and energy production	18	30	6,149,342	6,209,734	4,997,585	2,274,885	829,729
Goods production	93	121	5,663,040	5,489,579	7,290,301	661,016	303,692
Distribution and transportation of goods	57	72	682,660	673,816	4,872,490	99,384	35,772
Information	14	17	73,752	34,426	135,295	3,816	5,982
Finance, insurance, real estate, and rental and leasing	23	42	3,101,754	8,505,941	2,215,315	392,754	72,907
Services	59	77	423,458	478,339	373,526	84,337	28,350
<b>Ireland</b>							
<b>All industries</b>	<b>670</b>	<b>1,202</b>	<b>644,440,681</b>	<b>735,862,289</b>	<b>226,920,124</b>	<b>60,243,214</b>	<b>3,279,086</b>
Raw materials and energy production	6	6	* 21,128	* 25,507	* 32,382	* 565	* 357
Goods production	185	235	73,878,706	81,622,671	56,776,752	13,259,381	543,381
Distribution and transportation of goods	163	205	33,183,325	34,401,946	38,055,134	2,925,559	143,500
Information	48	62	57,744,616	61,724,505	34,693,352	6,932,442	211,710
Finance, insurance, real estate, and rental and leasing	143	320	348,567,232	400,313,119	35,750,358	16,423,218	942,223
Services	261	374	131,045,673	157,774,541	61,612,147	20,703,179	1,437,915
<b>Israel</b>							
<b>All industries [2]</b>	<b>595</b>	<b>893</b>	<b>31,747,506</b>	<b>31,049,596</b>	<b>18,566,851</b>	<b>363,136</b>	<b>300,714</b>
Raw materials and energy production	d	d	d	d	d	d	d
Goods production	156	214	22,682,850	21,355,760	10,176,053	297,095	188,729
Distribution and transportation of goods	63	80	1,528,241	1,608,242	2,572,450	92,993	24,255
Information	112	116	375,422	447,894	481,845	-30,896	2,894
Finance, insurance, real estate, and rental and leasing	57	72	1,136,237	1,238,101	259,995	33,240	10,160
Services	294	406	6,016,085	6,386,330	5,072,882	-8,852	74,673
<b>Italy</b>							
<b>All industries [2]</b>	<b>912</b>	<b>1,665</b>	<b>105,199,590</b>	<b>98,266,680</b>	<b>81,820,648</b>	<b>5,748,313</b>	<b>2,172,233</b>
Raw materials and energy production	d	d	d	d	d	d	d
Goods production	309	511	51,090,614	46,525,958	40,943,310	3,051,166	1,109,985
Distribution and transportation of goods	328	425	15,986,332	15,498,335	20,389,229	973,453	452,583
Information	66	106	2,325,169	3,296,613	2,421,272	271,089	90,957
Finance, insurance, real estate, and rental and leasing	56	138	16,186,887	14,150,604	4,399,030	172,425	172,378
Services	290	454	19,094,780	18,295,672	13,320,843	1,241,482	335,411
<b>Japan (including Okinawa and Ryukyu Islands)</b>							
<b>All industries [2]</b>	<b>1,396</b>	<b>2,730</b>	<b>603,994,362</b>	<b>640,022,632</b>	<b>260,530,351</b>	<b>6,310,600</b>	<b>5,760,841</b>
Raw materials and energy production	3	4	* 89,484	* 98,901	* 85,130	* 13,748	* 7,241
Goods production	355	536	59,328,512	68,661,211	103,093,922	3,227,309	2,242,453
Distribution and transportation of goods	455	610	32,658,493	38,820,418	56,849,151	1,979,876	992,151
Information	128	182	4,667,103	5,380,991	4,436,687	550,756	259,266
Finance, insurance, real estate, and rental and leasing	83	590	473,979,927	487,571,447	62,840,231	-3,674,038	1,585,955
Services	569	804	33,270,620	39,489,217	33,224,037	4,212,826	673,772
<b>Luxembourg</b>							
<b>All industries</b>	<b>349</b>	<b>681</b>	<b>815,373,255</b>	<b>828,469,211</b>	<b>271,013,325</b>	<b>30,706,183</b>	<b>2,744,313</b>
Raw materials and energy production	3	3	* 3,420,233	* 3,582,092	* 2,015,803	* 291,222	* 51,204
Goods production	51	58	71,567,900	73,012,635	33,008,065	4,217,044	266,114
Distribution and transportation of goods	28	31	48,283,553	55,967,739	18,043,863	4,260,257	365,536
Information	12	17	14,664,589	26,104,254	3,663,845	639,597	119,526
Finance, insurance, real estate, and rental and leasing	74	236	328,766,516	242,713,121	24,281,423	2,303,431	103,259
Services	230	336	348,670,464	427,089,370	190,000,326	18,994,633	1,838,674

Footnotes at end of table.

## Controlled Foreign Corporations, 2008

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**Table 3. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, and Subpart F Income, by Selected Country of Incorporation and Industrial Sector of Controlled Foreign Corporation, Tax Year 2008—Continued**

[All figures are estimates based on a sample—money amounts are in thousands of dollars]

Selected country of incorporation and industrial sector of Controlled Foreign Corporation	Number of U.S. corporation returns [1]	Controlled Foreign Corporations					
		Number of foreign corporations	Total assets		Total receipts	Current earnings and profits (less deficit) before income taxes	Income taxes
			Beginning of year	End of year			
	(1)	(2)	(3)	(4)	(5)	(6)	(7)
<b>Malaysia</b>							
All industries [2]	524	870	33,907,342	33,641,309	28,249,795	2,027,892	324,848
Raw materials and energy production	d	d	d	d	d	d	d
Goods production	177	252	9,384,849	9,637,697	17,343,933	952,190	94,748
Distribution and transportation of goods	166	210	1,783,812	1,743,281	5,376,779	356,371	77,929
Information	29	40	73,751	77,446	122,997	2,261	783
Finance, insurance, real estate, and rental and leasing	39	75	19,656,792	19,025,080	1,570,334	465,584	87,012
Services	187	271	2,850,478	2,919,673	3,521,587	222,344	55,623
<b>Mauritius</b>							
All industries [2]	244	335	45,269,236	29,915,151	4,968,531	1,085,149	199,351
Raw materials and energy production	d	d	d	d	d	d	d
Goods production	19	19	485,652	419,185	392,583	21,074	* 4,673
Distribution and transportation of goods	10	11	137,733	128,329	* 222,030	15,386	* 1,811
Information	6	11	* 282,952	* 344,762	* 319,937	7,243	* 2,012
Finance, insurance, real estate, and rental and leasing	31	52	6,001,703	7,586,720	781,329	-13,405	7,335
Services	192	237	37,206,378	19,631,856	2,529,240	718,687	91,743
<b>Mexico</b>							
All industries [2]	2,338	4,910	312,674,302	300,941,620	222,763,722	17,903,832	4,391,298
Raw materials and energy production	80	148	7,997,313	8,346,940	6,331,081	827,548	285,905
Goods production	1,175	1,977	62,972,210	64,153,104	102,029,417	4,512,777	1,264,680
Distribution and transportation of goods	642	927	31,551,310	30,456,708	58,772,213	3,926,617	1,184,795
Information	88	199	5,626,590	5,968,220	7,939,687	463,147	153,791
Finance, insurance, real estate, and rental and leasing	185	443	140,959,248	133,647,499	27,867,807	3,698,769	1,033,379
Services	744	1,211	63,566,830	58,368,307	19,823,536	4,475,158	468,730
<b>Netherlands</b>							
All industries	1,570	3,505	1,447,732,109	1,530,361,553	425,599,030	94,411,437	12,563,568
Raw materials and energy production	36	73	23,768,445	21,108,826	5,754,001	5,786,471	2,252,236
Goods production	397	621	192,815,001	215,120,204	130,065,662	15,065,398	1,819,286
Distribution and transportation of goods	411	601	118,855,368	120,850,661	78,403,752	10,094,256	725,776
Information	86	167	55,650,212	45,420,617	24,105,755	6,086,377	1,729,903
Finance, insurance, real estate, and rental and leasing	149	299	394,235,751	395,836,341	28,258,195	4,063,549	219,338
Services	941	1,744	662,407,332	732,024,903	159,011,666	53,315,385	5,817,028
<b>New Zealand</b>							
All industries [2]	433	637	13,260,816	10,646,367	11,397,006	918,952	267,993
Raw materials and energy production	d	d	d	d	d	d	d
Goods production	115	128	3,314,573	2,459,633	3,340,826	237,004	72,602
Distribution and transportation of goods	159	183	2,684,829	2,110,235	4,699,615	110,424	41,891
Information	31	41	306,165	199,028	333,787	32,490	6,682
Finance, insurance, real estate, and rental and leasing	25	60	3,270,457	2,905,135	907,638	417,748	105,195
Services	143	207	2,983,915	2,441,469	1,883,115	149,588	36,357
<b>Norway</b>							
All industries	261	474	33,121,421	29,581,232	21,900,588	5,959,311	4,018,107
Raw materials and energy production	11	16	9,217,391	7,569,894	7,507,991	5,382,471	3,775,550
Goods production	54	81	5,671,309	5,287,751	3,090,472	68,966	48,132
Distribution and transportation of goods	108	162	4,430,012	2,708,313	5,270,455	345,568	76,741
Information	17	20	150,128	144,925	190,740	8,047	3,856
Finance, insurance, real estate, and rental and leasing	18	29	1,877,329	2,256,260	353,892	48,886	* 9,269
Services	94	166	11,775,252	11,614,088	5,487,038	105,372	104,558

Footnotes at end of table.

## Controlled Foreign Corporations, 2008

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**Table 3. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, and Subpart F Income, by Selected Country of Incorporation and Industrial Sector of Controlled Foreign Corporation, Tax Year 2008—Continued**

[All figures are estimates based on a sample—money amounts are in thousands of dollars]

Selected country of incorporation and industrial sector of Controlled Foreign Corporation	Number of U.S. corporation returns [1]	Number of foreign corporations	Controlled Foreign Corporations				
			Total assets		Total receipts	Current earnings and profits (less deficit) before income taxes	Income taxes
			Beginning of year	End of year			
(1)	(2)	(3)	(4)	(5)	(6)	(7)	
<b>Panama (including Canal Zone)</b>							
<b>All industries</b>	<b>175</b>	<b>282</b>	<b>16,495,478</b>	<b>19,430,783</b>	<b>10,528,299</b>	<b>1,831,859</b>	<b>227,923</b>
Raw materials and energy production	12	19	1,562,081	1,854,087	1,192,276	231,069	60,745
Goods production	29	34	1,373,858	1,968,726	3,428,887	197,301	13,983
Distribution and transportation of goods	63	79	3,665,673	4,815,583	3,339,913	583,207	83,837
Information	6	6	* 8,487	* 11,140	* 14,592	* 1,042	* 262
Finance, insurance, real estate, and rental and leasing	27	55	6,376,160	6,757,344	885,335	290,024	5,300
Services	59	89	3,509,220	4,023,903	1,667,295	529,215	63,795
<b>Peru</b>							
<b>All industries [2]</b>	<b>233</b>	<b>297</b>	<b>10,595,990</b>	<b>10,080,952</b>	<b>7,748,309</b>	<b>1,747,150</b>	<b>625,468</b>
Raw materials and energy production	25	38	3,583,439	3,434,090	3,158,385	1,307,125	462,786
Goods production	44	47	1,635,828	1,468,160	1,369,559	100,803	58,628
Distribution and transportation of goods	73	79	588,481	786,692	1,604,677	76,087	35,285
Information	d	d	d	d	d	d	d
Finance, insurance, real estate, and rental and leasing	18	27	1,890,117	2,221,174	571,148	110,488	38,717
Services	75	89	2,431,339	1,813,180	748,368	161,119	28,370
<b>Philippines</b>							
<b>All industries</b>	<b>328</b>	<b>557</b>	<b>17,182,578</b>	<b>17,120,409</b>	<b>16,728,113</b>	<b>1,308,483</b>	<b>337,641</b>
Raw materials and energy production	10	20	484,135	468,879	207,219	110,611	* 32,279
Goods production	114	150	7,286,034	7,616,734	11,649,343	644,138	184,175
Distribution and transportation of goods	72	93	750,338	659,556	996,700	70,965	24,278
Information	32	52	233,154	242,833	241,018	13,310	1,918
Finance, insurance, real estate, and rental and leasing	39	80	5,535,787	5,187,678	1,103,010	156,876	56,639
Services	120	163	2,893,129	2,944,730	2,530,824	312,584	38,352
<b>Poland</b>							
<b>All industries</b>	<b>498</b>	<b>847</b>	<b>56,862,855</b>	<b>65,541,260</b>	<b>38,548,275</b>	<b>3,525,316</b>	<b>829,646</b>
Raw materials and energy production	12	14	44,942	37,058	55,902	554	* 632
Goods production	177	263	16,947,084	15,698,977	20,237,932	1,507,486	317,927
Distribution and transportation of goods	155	208	3,381,627	4,361,535	9,687,079	596,850	121,638
Information	34	47	167,425	146,549	319,557	12,685	4,872
Finance, insurance, real estate, and rental and leasing	37	101	32,634,547	41,868,448	5,616,650	1,271,444	329,992
Services	153	214	3,687,230	3,428,693	2,631,157	136,296	54,586
<b>Portugal (including Azores)</b>							
<b>All industries</b>	<b>248</b>	<b>419</b>	<b>28,421,831</b>	<b>28,559,203</b>	<b>15,702,627</b>	<b>1,947,968</b>	<b>300,764</b>
Raw materials and energy production	4	4	* 10,214	* 10,627	* 24,696	* 813	* 521
Goods production	67	96	4,934,271	4,047,026	4,609,313	206,936	85,462
Distribution and transportation of goods	96	133	3,870,003	4,244,602	6,791,728	463,430	138,707
Information	20	24	316,801	245,580	265,116	-19,390	7,476
Finance, insurance, real estate, and rental and leasing	23	41	4,359,562	4,336,600	784,371	734	13,652
Services	77	121	14,930,980	15,674,768	3,227,403	1,295,446	54,945
<b>Puerto Rico</b>							
<b>All industries</b>	<b>311</b>	<b>423</b>	<b>24,330,711</b>	<b>31,354,286</b>	<b>27,736,448</b>	<b>6,413,405</b>	<b>261,458</b>
Raw materials and energy production	3	4	* 2,256	* 16,812	* 37,942	* 22,353	* 59
Goods production	88	101	9,019,878	11,876,662	7,011,227	1,299,474	29,467
Distribution and transportation of goods	101	108	3,065,707	3,171,339	8,347,044	193,297	102,920
Information	20	35	422,734	379,574	185,971	-43,052	2,896
Finance, insurance, real estate, and rental and leasing	42	69	6,595,197	7,742,344	3,213,306	413,671	63,136
Services	81	105	5,224,939	8,167,554	8,940,958	4,527,662	62,979

Footnotes at end of table.

## Controlled Foreign Corporations, 2008

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**Table 3. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, and Subpart F Income, by Selected Country of Incorporation and Industrial Sector of Controlled Foreign Corporation, Tax Year 2008—Continued**

[All figures are estimates based on a sample—money amounts are in thousands of dollars]

Selected country of incorporation and industrial sector of Controlled Foreign Corporation	Number of U.S. corporation returns [1]	Controlled Foreign Corporations					
		Number of foreign corporations	Total assets		Total receipts	Current earnings and profits (less deficit) before income taxes	Income taxes
			Beginning of year	End of year			
(1)	(2)	(3)	(4)	(5)	(6)	(7)	
<b>Romania</b>							
All industries	166	254	7,362,317	7,963,274	8,201,252	231,039	95,581
Raw materials and energy production	d	d	d	d	d	d	d
Goods production	64	81	2,793,603	3,458,006	5,487,265	152,790	53,757
Distribution and transportation of goods	39	52	556,726	715,432	1,439,753	83,343	17,649
Information	d	d	d	d	d	d	d
Finance, insurance, real estate, and rental and leasing	17	31	2,924,886	2,959,721	522,990	48,054	14,685
Services	46	56	210,689	192,064	354,520	21,757	6,063
<b>Russia</b>							
All industries [2]	350	735	19,519,020	28,831,871	34,268,105	2,988,158	930,916
Raw materials and energy production	d	d	d	d	d	d	d
Goods production	99	155	8,315,598	8,332,415	12,541,580	1,124,735	386,976
Distribution and transportation of goods	115	172	3,929,260	3,926,409	12,418,185	413,489	192,525
Information	32	145	2,849,845	4,250,082	3,273,226	837,565	161,437
Finance, insurance, real estate, and rental and leasing	28	47	2,266,098	9,875,132	2,555,506	444,132	111,534
Services	107	167	1,993,437	2,268,757	2,602,545	171,255	67,182
<b>Singapore</b>							
All industries [2]	1,200	1,843	203,383,365	187,225,044	136,468,290	13,767,264	1,068,070
Raw materials and energy production	d	d	d	d	d	d	d
Goods production	276	367	24,900,164	26,212,294	30,819,009	3,561,755	283,648
Distribution and transportation of goods	343	431	27,541,077	28,114,119	68,409,676	2,019,372	200,061
Information	80	109	1,334,529	1,914,645	1,489,741	103,465	11,776
Finance, insurance, real estate, and rental and leasing	77	155	94,475,003	71,447,337	7,694,012	2,131,956	235,482
Services	574	758	54,455,617	58,078,972	26,903,177	5,402,630	296,014
<b>Slovakia</b>							
All industries	154	213	5,066,207	6,015,988	4,761,532	224,613	57,256
Raw materials and energy production	d	d	d	d	d	d	d
Goods production	49	65	1,528,547	1,810,032	3,085,071	40,023	17,918
Distribution and transportation of goods	47	53	580,684	640,731	628,175	52,527	10,499
Information	d	d	d	d	d	d	d
Finance, insurance, real estate, and rental and leasing	16	27	2,508,540	3,084,849	397,006	63,926	17,547
Services	39	53	404,623	421,987	594,556	60,930	11,030
<b>South Africa</b>							
All industries [2]	402	675	16,207,652	13,073,625	22,516,696	1,735,974	401,304
Raw materials and energy production	d	d	d	d	d	d	d
Goods production	154	208	7,523,570	6,132,753	16,396,768	668,461	160,912
Distribution and transportation of goods	120	152	1,541,028	1,478,094	2,326,710	202,751	77,448
Information	30	43	239,881	215,238	261,571	46,816	13,961
Finance, insurance, real estate, and rental and leasing	33	66	3,729,761	2,466,557	1,204,657	486,798	74,382
Services	126	194	2,758,450	2,404,871	2,118,339	292,650	72,031
<b>South Korea</b>							
All industries	598	860	150,926,406	173,643,946	98,805,628	5,597,217	1,554,805
Raw materials and energy production	6	8	* 1,387,225	* 1,356,669	* 1,184,153	* 75,355	* 12,608
Goods production	192	263	48,297,889	40,099,633	68,150,767	3,048,766	581,509
Distribution and transportation of goods	193	215	5,460,355	4,273,630	10,397,144	592,898	263,615
Information	40	58	3,285,064	2,489,753	2,214,507	27,209	25,579
Finance, insurance, real estate, and rental and leasing	39	91	88,960,668	122,781,292	12,095,586	1,664,380	514,251
Services	185	225	3,535,204	2,642,968	4,763,471	188,609	157,244

Footnotes at end of table.

# Controlled Foreign Corporations, 2008

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**Table 3. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, and Subpart F Income, by Selected Country of Incorporation and Industrial Sector of Controlled Foreign Corporation, Tax Year 2008—Continued**

[All figures are estimates based on a sample—money amounts are in thousands of dollars]

Selected country of incorporation and industrial sector of Controlled Foreign Corporation	Number of U.S. corporation returns [1]	Controlled Foreign Corporations					
		Number of foreign corporations	Total assets		Total receipts	Current earnings and profits (less deficit) before income taxes	Income taxes
			Beginning of year	End of year			
(1)	(2)	(3)	(4)	(5)	(6)	(7)	
<b>Spain (including Canary Isles)</b>							
<b>All industries</b>	<b>851</b>	<b>1,785</b>	<b>207,670,482</b>	<b>177,768,246</b>	<b>181,753,636</b>	<b>13,947,862</b>	<b>2,613,574</b>
Raw materials and energy production	11	25	780,122	1,040,531	329,056	22,148	* 4,883
Goods production	257	433	65,992,176	60,299,889	66,033,011	3,129,175	820,768
Distribution and transportation of goods	292	415	15,269,740	15,129,310	21,684,057	1,030,381	301,903
Information	75	126	1,809,764	1,893,993	2,124,695	136,984	59,738
Finance, insurance, real estate, and rental and leasing	58	142	46,709,575	32,658,089	6,248,406	1,454,863	438,776
Services	305	644	77,109,105	66,746,434	85,334,410	8,174,310	987,505
<b>Sweden</b>							
<b>All industries</b>	<b>583</b>	<b>1,052</b>	<b>100,308,054</b>	<b>106,956,533</b>	<b>50,538,470</b>	<b>828,850</b>	<b>603,780</b>
Raw materials and energy production	5	5	* 17,915	* 18,458	* 36,282	* 2,523	* 509
Goods production	168	241	32,732,145	29,984,800	29,246,404	154,990	218,290
Distribution and transportation of goods	187	236	4,676,618	3,722,424	8,954,534	225,021	87,706
Information	41	76	845,124	827,862	1,149,384	56,428	21,619
Finance, insurance, real estate, and rental and leasing	36	74	23,954,646	25,340,197	2,660,365	925,750	65,149
Services	242	420	38,081,606	47,062,793	8,491,502	-535,862	210,506
<b>Switzerland</b>							
<b>All industries [2]</b>	<b>741</b>	<b>1,411</b>	<b>434,106,468</b>	<b>505,771,402</b>	<b>324,325,636</b>	<b>48,096,014</b>	<b>3,117,765</b>
Raw materials and energy production	d	d	d	d	d	d	d
Goods production	212	308	124,072,038	147,376,429	124,955,054	16,074,629	1,380,892
Distribution and transportation of goods	270	407	62,766,954	72,740,612	122,382,124	8,229,097	869,883
Information	57	93	6,948,466	11,544,741	5,992,225	2,046,289	82,438
Finance, insurance, real estate, and rental and leasing	75	126	95,879,700	95,099,814	8,351,322	870,502	108,614
Services	318	469	143,370,567	177,717,992	61,316,926	20,671,269	663,984
<b>Taiwan</b>							
<b>All industries [2]</b>	<b>417</b>	<b>587</b>	<b>96,439,834</b>	<b>94,353,954</b>	<b>40,100,431</b>	<b>1,658,606</b>	<b>662,678</b>
Raw materials and energy production	0	0	0	0	0	0	0
Goods production	169	201	13,058,191	12,423,549	16,584,873	1,178,755	289,007
Distribution and transportation of goods	115	135	2,398,220	2,310,458	5,408,625	170,563	54,031
Information	d	d	d	d	d	d	d
Finance, insurance, real estate, and rental and leasing	28	68	77,572,242	76,550,136	14,358,952	91,390	227,711
Services	124	154	3,327,449	2,941,320	3,620,518	213,932	88,774
<b>Thailand</b>							
<b>All industries [2]</b>	<b>455</b>	<b>757</b>	<b>24,502,762</b>	<b>23,502,008</b>	<b>30,820,484</b>	<b>1,186,487</b>	<b>492,606</b>
Raw materials and energy production	14	20	982,043	943,619	964,401	398,631	128,858
Goods production	168	234	11,242,041	9,790,776	21,366,070	176,934	181,985
Distribution and transportation of goods	145	173	2,261,203	2,282,634	5,380,105	232,649	76,245
Information	d	d	d	d	d	d	d
Finance, insurance, real estate, and rental and leasing	33	104	8,077,289	8,688,741	1,471,999	148,402	44,274
Services	144	201	1,865,489	1,738,120	1,560,647	228,142	59,006
<b>Turkey</b>							
<b>All industries [2]</b>	<b>260</b>	<b>389</b>	<b>18,755,630</b>	<b>18,365,845</b>	<b>29,947,814</b>	<b>3,176,423</b>	<b>502,010</b>
Raw materials and energy production	8	21	340,299	473,319	43,797	-22,622	* 383
Goods production	75	99	8,095,592	6,555,999	17,962,854	1,424,722	334,736
Distribution and transportation of goods	87	97	2,131,052	2,853,313	8,997,481	369,002	59,342
Information	d	d	d	d	d	d	d
Finance, insurance, real estate, and rental and leasing	28	39	5,057,063	4,734,572	1,193,589	96,174	19,447
Services	73	114	3,094,282	3,624,410	1,668,966	1,304,797	88,016

Footnotes at end of table.

## Controlled Foreign Corporations, 2008

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**Table 3. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, and Subpart F Income, by Selected Country of Incorporation and Industrial Sector of Controlled Foreign Corporation, Tax Year 2008—Continued**

[All figures are estimates based on a sample—money amounts are in thousands of dollars]

Selected country of incorporation and industrial sector of Controlled Foreign Corporation	Number of U.S. corporation returns [1]	Controlled Foreign Corporations					
		Number of foreign corporations	Total assets		Total receipts	Current earnings and profits (less deficit) before income taxes	Income taxes
			Beginning of year	End of year			
(1)	(2)	(3)	(4)	(5)	(6)	(7)	
<b>United Kingdom and Northern Ireland (including Gibraltar)</b>							
All industries [2]	<b>3,507</b>	<b>8,707</b>	<b>4,346,235,389</b>	<b>3,740,306,920</b>	<b>721,733,470</b>	<b>12,079,582</b>	<b>10,405,448</b>
Raw materials and energy production	57	139	34,382,965	36,694,281	20,404,644	6,318,426	2,549,770
Goods production	1,030	1,777	148,188,449	109,193,211	181,107,897	1,906,047	1,347,307
Distribution and transportation of goods	854	1,288	80,624,356	63,185,414	162,608,149	3,787,681	963,228
Information	326	821	103,184,838	84,568,452	28,163,739	1,859,124	340,772
Finance, insurance, real estate, and rental and leasing	392	1,362	3,403,231,722	2,835,920,417	186,075,929	-16,065,319	3,471,122
Services	1,681	3,312	576,565,754	610,740,549	143,373,110	14,273,788	1,733,249
<b>Venezuela</b>							
All industries	<b>287</b>	<b>416</b>	<b>14,683,989</b>	<b>17,566,326</b>	<b>18,959,471</b>	<b>2,609,779</b>	<b>798,848</b>
Raw materials and energy production	27	35	1,123,007	1,302,338	953,728	130,114	23,322
Goods production	99	125	7,569,505	9,127,383	11,642,205	1,613,618	487,969
Distribution and transportation of goods	80	106	2,597,073	3,381,590	3,939,942	639,485	230,823
Information	22	27	182,876	240,451	184,073	24,428	* 3,607
Finance, insurance, real estate, and rental and leasing	27	38	2,262,033	2,339,877	1,416,032	114,322	21,359
Services	68	86	949,496	1,174,685	823,491	87,811	31,769
<b>European Union, total</b>							
All industries [2]	<b>5,546</b>	<b>32,564</b>	<b>8,825,695,866</b>	<b>8,434,622,314</b>	<b>2,635,200,438</b>	<b>266,658,835</b>	<b>45,207,781</b>
Raw materials and energy production	115	388	65,424,255	65,795,606	31,295,764	12,620,106	4,908,144
Goods production	1,900	7,591	946,420,709	914,380,399	873,424,528	56,742,519	10,196,452
Distribution and transportation of goods	1,609	6,430	431,617,722	421,183,455	499,553,550	30,584,359	5,062,459
Information	492	2,287	271,038,676	259,855,767	112,834,308	17,179,441	2,952,351
Finance, insurance, real estate, and rental and leasing	687	3,621	4,864,699,689	4,299,946,566	330,965,987	18,103,946	7,101,862
Services	2,964	12,228	2,246,437,162	2,473,455,419	787,126,271	131,429,094	14,986,513
<b>OPEC countries, total</b>							
All industries [2]	<b>607</b>	<b>1,402</b>	<b>44,387,489</b>	<b>57,035,039</b>	<b>62,095,391</b>	<b>10,903,639</b>	<b>4,069,971</b>
Raw materials and energy production	54	133	13,313,220	16,277,899	11,800,201	5,895,311	2,686,872
Goods production	211	392	15,562,594	17,472,100	23,619,435	2,682,989	843,328
Distribution and transportation of goods	178	321	5,421,177	6,436,515	13,743,411	1,139,219	310,575
Information	d	d	d	d	d	d	d
Finance, insurance, real estate, and rental and leasing	61	144	7,083,072	13,066,758	8,667,641	660,318	127,475
Services	186	329	2,653,260	3,312,543	3,635,223	426,494	91,719

Footnotes at end of table.

## Controlled Foreign Corporations, 2008

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**Table 3. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, and Subpart F Income, by Selected Country of Incorporation and Industrial Sector of Controlled Foreign Corporation, Tax Year 2008—Continued**

[All figures are estimates based on a sample—money amounts are in thousands of dollars]

Selected country of incorporation and industrial sector of Controlled Foreign Corporation	Controlled Foreign Corporations					
	Current earnings and profits (less deficit) after income taxes	Foreign corporations with (+) current earnings and profits before income taxes		Distributions out of earnings and profits	Dividends paid to controlling U.S. corporation	Total Subpart F income
		Current earnings and profits before income taxes	Income taxes			
	(8)	(9)	(10)	(11)	(12)	(13)
<b>All geographic regions</b>						
<b>All industries [2]</b>	<b>536,766,219</b>	<b>854,456,504</b>	<b>120,177,246</b>	<b>369,973,531</b>	<b>96,741,710</b>	<b>80,355,541</b>
Raw materials and energy production	55,215,396	91,433,086	30,078,063	34,278,175	15,282,001	1,613,824
Goods production	125,756,821	194,502,978	27,186,539	78,728,702	19,582,745	16,095,489
Distribution and transportation of goods	58,919,684	83,841,104	14,283,039	37,401,938	6,526,300	7,541,531
Information	19,413,078	29,606,615	4,547,725	3,901,695	1,182,501	1,671,025
Finance, insurance, real estate, and rental and leasing	38,129,902	149,957,029	16,696,336	51,086,993	8,086,882	26,965,313
Services	239,334,780	305,109,747	27,385,479	164,571,320	46,077,969	26,468,360
<b>Argentina</b>						
<b>All industries</b>	<b>1,643,606</b>	<b>3,043,240</b>	<b>952,726</b>	<b>1,507,280</b>	<b>523,299</b>	<b>92,062</b>
Raw materials and energy production	209,600	379,406	112,134	* 68,209	* 7,866	* 7,990
Goods production	689,401	1,147,541	348,414	292,967	88,749	* 340
Distribution and transportation of goods	223,920	577,893	253,860	627,457	63,220	19,918
Information	46,744	148,438	64,345	* 81,852	* 409	* 5,338
Finance, insurance, real estate, and rental and leasing	276,857	473,992	94,432	371,068	336,280	15,201
Services	197,083	315,971	79,541	65,727	26,775	43,275
<b>Australia</b>						
<b>All industries [2]</b>	<b>19,700,357</b>	<b>27,407,693</b>	<b>3,958,287</b>	<b>9,158,654</b>	<b>2,831,545</b>	<b>1,936,790</b>
Raw materials and energy production	d	d	d	d	d	d
Goods production	2,822,644	4,971,101	1,253,097	2,372,344	737,754	168,127
Distribution and transportation of goods	997,022	1,674,748	449,948	437,564	180,674	88,892
Information	331,317	667,108	78,391	75,930	* 14,456	31,689
Finance, insurance, real estate, and rental and leasing	8,369,168	9,469,464	389,587	2,569,813	* 522,804	1,411,994
Services	4,076,449	5,374,801	353,133	2,890,261	1,311,938	155,708
<b>Austria</b>						
<b>All industries</b>	<b>1,199,152</b>	<b>1,925,014</b>	<b>266,521</b>	<b>1,553,802</b>	<b>356,938</b>	<b>333,167</b>
Raw materials and energy production	* -10,249	* 7,696	* 1,867	0	0	0
Goods production	783,479	963,735	116,092	945,058	294,425	235,453
Distribution and transportation of goods	243,739	394,351	68,752	254,092	* 5,888	41,135
Information	39,391	71,085	5,362	* 22,164	0	* 948
Finance, insurance, real estate, and rental and leasing	106,568	126,166	7,451	86,537	* 53,562	* 20,566
Services	36,224	361,981	66,997	245,952	* 3,063	35,064
<b>Bahamas</b>						
<b>All industries</b>	<b>13,780,620</b>	<b>17,660,746</b>	<b>3,044,892</b>	<b>12,173,213</b>	<b>9,192,562</b>	<b>1,088,424</b>
Raw materials and energy production	3,060,963	4,549,485	* 935,013	2,493,154	* 1,428,072	44,532
Goods production	d	d	d	d	d	d
Distribution and transportation of goods	-50,437	44,884	* 20,694	* 9,965	* 4,862	* 3,853
Information	d	d	d	d	d	d
Finance, insurance, real estate, and rental and leasing	971,702	992,560	* 2,327	731,286	* 127,313	279,732
Services	7,965,069	10,185,716	2,064,204	8,535,516	* 7,629,747	344,111
<b>Belgium</b>						
<b>All industries</b>	<b>2,661,920</b>	<b>5,198,421</b>	<b>1,070,081</b>	<b>3,565,386</b>	<b>1,779,474</b>	<b>478,315</b>
Raw materials and energy production	* 8,783	* 12,955	* 2,961	* 3,680	0	0
Goods production	736,644	1,736,576	339,069	2,168,864	1,700,564	230,720
Distribution and transportation of goods	402,160	961,153	309,713	266,016	45,995	54,749
Information	122,889	339,154	16,628	* 3,463	0	* 10,052
Finance, insurance, real estate, and rental and leasing	514,731	631,120	106,726	96,595	* 12,143	114,212
Services	876,713	1,517,464	294,984	1,026,769	20,772	68,582

Footnotes at end of table.

# Controlled Foreign Corporations, 2008

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**Table 3. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, and Subpart F Income, by Selected Country of Incorporation and Industrial Sector of Controlled Foreign Corporation, Tax Year 2008—Continued**

[All figures are estimates based on a sample—money amounts are in thousands of dollars]

Selected country of incorporation and industrial sector of Controlled Foreign Corporation	Controlled Foreign Corporations					Total Subpart F income	
	Current earnings and profits (less deficit) after income taxes	Foreign corporations with (+) current earnings and profits before income taxes		Distributions out of earnings and profits	Dividends paid to controlling U.S. corporation		
		Current earnings and profits before income taxes	Income taxes				
	(8)	(9)	(10)	(11)	(12)	(13)	
<b>Bermuda</b>							
<b>All industries</b>	<b>58,498,985</b>	<b>72,386,105</b>	<b>9,899,051</b>	<b>33,616,555</b>	<b>6,447,286</b>	<b>6,275,458</b>	
Raw materials and energy production	6,885,312	14,117,810	6,420,052	2,269,108	* 1,708,307	364,011	
Goods production	19,660,443	20,210,668	435,401	2,834,459	* 390,967	1,797,318	
Distribution and transportation of goods	1,881,355	2,026,982	78,805	1,042,675	* 54,572	344,984	
Information	* -63,268	* 21,722	* 195	* 10,320	* 8,035	* 1,210	
Finance, insurance, real estate, and rental and leasing	565,017	2,693,832	170,752	2,228,065	* 62,996	1,093,627	
Services	29,570,126	33,315,091	2,793,846	25,231,927	4,222,409	2,674,308	
<b>Brazil</b>							
<b>All industries [2]</b>	<b>8,885,091</b>	<b>15,326,069</b>	<b>3,915,382</b>	<b>7,531,497</b>	<b>2,426,144</b>	<b>1,030,643</b>	
Raw materials and energy production	1,974,022	2,640,229	572,386	1,384,374	* 44,044	41,163	
Goods production	4,142,325	6,711,598	1,447,363	3,453,652	1,314,579	549,178	
Distribution and transportation of goods	285,191	1,427,661	450,405	91,807	20,634	79,203	
Information	32,768	218,374	76,166	* 8,248	0	26,588	
Finance, insurance, real estate, and rental and leasing	1,065,411	2,393,531	1,106,133	1,116,396	604,212	216,372	
Services	1,385,819	1,934,676	262,929	1,477,020	442,675	118,139	
<b>British Virgin Islands</b>							
<b>All industries [2]</b>	<b>7,132,590</b>	<b>8,637,566</b>	<b>719,919</b>	<b>1,697,531</b>	<b>1,023,161</b>	<b>878,589</b>	
Raw materials and energy production	1,063,780	1,756,390	* 637,872	* 967,229	* 955,352	* 47,548	
Goods production	5,467,217	5,762,944	* 1,505	* 383,710	* 20,354	* 742,277	
Distribution and transportation of goods	-8,323	16,722	* 5,849	* 4,461	* 758	* 3,227	
Information	d	d	d	d	d	d	
Finance, insurance, real estate, and rental and leasing	53,769	141,858	* 33,656	* 20,985	* 1,594	15,896	
Services	551,287	947,979	41,029	321,147	* 45,103	69,640	
<b>Canada</b>							
<b>All industries [2]</b>	<b>35,596,454</b>	<b>61,233,066</b>	<b>10,981,108</b>	<b>35,347,550</b>	<b>13,046,800</b>	<b>3,084,492</b>	
Raw materials and energy production	12,626,752	16,261,479	2,033,952	12,387,517	4,881,303	166,012	
Goods production	2,226,855	12,836,543	3,496,532	7,131,355	2,740,800	760,511	
Distribution and transportation of goods	5,074,824	9,091,395	2,278,954	3,240,241	1,845,990	491,703	
Information	234,398	1,179,159	353,281	504,907	229,343	144,042	
Finance, insurance, real estate, and rental and leasing	6,966,580	10,194,126	1,554,051	6,048,283	856,817	805,743	
Services	8,462,804	11,666,114	1,264,338	6,035,247	2,492,549	716,481	
<b>Cayman Islands</b>							
<b>All industries [2]</b>	<b>35,262,715</b>	<b>55,070,647</b>	<b>7,705,744</b>	<b>16,929,504</b>	<b>6,864,013</b>	<b>4,918,755</b>	
Raw materials and energy production	7,906,230	12,508,238	4,172,183	3,969,635	* 2,033,150	152,650	
Goods production	3,144,157	3,803,797	318,996	2,020,990	* 1,529,115	269,372	
Distribution and transportation of goods	3,858,911	4,025,008	109,707	516,669	* 12,328	168,531	
Information	d	d	d	d	d	d	
Finance, insurance, real estate, and rental and leasing	275,610	12,244,601	1,622,488	3,979,718	866,468	2,164,933	
Services	20,062,838	22,462,391	1,481,618	6,417,292	2,397,751	2,163,269	
<b>Chile</b>							
<b>All industries [2]</b>	<b>2,323,109</b>	<b>3,159,698</b>	<b>489,407</b>	<b>1,921,338</b>	<b>1,069,835</b>	<b>121,980</b>	
Raw materials and energy production	1,094,905	1,456,389	295,859	1,094,469	* 650,935	17,064	
Goods production	378,779	474,685	41,351	207,658	161,401	* 37,052	
Distribution and transportation of goods	177,775	323,437	44,741	90,802	* 57,479	7,145	
Information	d	d	d	d	d	d	
Finance, insurance, real estate, and rental and leasing	92,948	164,293	20,768	75,042	* 6,234	29,892	
Services	468,736	593,919	77,710	359,428	* 170,544	29,209	

Footnotes at end of table.

# Controlled Foreign Corporations, 2008

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**Table 3. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, and Subpart F Income, by Selected Country of Incorporation and Industrial Sector of Controlled Foreign Corporation, Tax Year 2008—Continued**

[All figures are estimates based on a sample—money amounts are in thousands of dollars]

Selected country of incorporation and industrial sector of Controlled Foreign Corporation	Controlled Foreign Corporations					Total Subpart F income	
	Current earnings and profits (less deficit) after income taxes	Foreign corporations with (+) current earnings and profits before income taxes		Distributions out of earnings and profits	Dividends paid to controlling U.S. corporation		
		Current earnings and profits before income taxes	Income taxes				
	(8)	(9)	(10)	(11)	(12)	(13)	
<b>China</b>							
<b>All industries [2]</b>	<b>7,277,701</b>	<b>11,726,721</b>	<b>1,408,435</b>	<b>5,667,871</b>	<b>1,598,572</b>	<b>253,424</b>	
Raw materials and energy production	183,604	210,027	11,185	* 21,911	* 14,830	* 259	
Goods production	2,939,554	5,389,337	718,734	2,749,800	1,355,775	104,814	
Distribution and transportation of goods	1,108,963	1,920,534	323,169	425,605	129,097	39,325	
Information	11,838	81,733	-1,961	* 166	0	* 870	
Finance, insurance, real estate, and rental and leasing	172,081	449,647	95,067	* 39,119	* 3,906	* 8,708	
Services	2,861,872	3,675,074	262,203	2,431,023	94,964	99,447	
<b>Colombia</b>							
<b>All industries</b>	<b>1,114,372</b>	<b>1,751,092</b>	<b>458,889</b>	<b>606,735</b>	<b>337,214</b>	<b>43,404</b>	
Raw materials and energy production	-16,289	10,215	* 1,992	0	0	0	
Goods production	413,129	720,632	214,885	431,374	264,526	36,520	
Distribution and transportation of goods	150,891	248,302	71,021	77,292	* 64,002	* 1,963	
Information	11,916	21,026	6,191	* 2,804	* 1,487	* 1,592	
Finance, insurance, real estate, and rental and leasing	504,219	674,148	151,655	88,172	* 4,490	* 3,161	
Services	50,505	76,769	13,145	7,094	* 2,709	* 168	
<b>Costa Rica</b>							
<b>All industries</b>	<b>550,121</b>	<b>759,847</b>	<b>134,145</b>	<b>249,600</b>	<b>49,115</b>	<b>67,728</b>	
Raw materials and energy production	31,755	64,071	* 16,704	* 25,735	0	* 2,206	
Goods production	171,321	218,753	28,756	134,565	* 42,126	30,223	
Distribution and transportation of goods	143,766	198,135	47,377	* 10,895	* 3,732	* 4,279	
Information	4,886	* 18,369	* 11,837	* 3,996	* 2,102	* 3,072	
Finance, insurance, real estate, and rental and leasing	171,138	216,541	24,636	* 65,478	* 1,152	* 16,262	
Services	27,256	43,977	4,835	* 8,931	* 2	* 11,686	
<b>Czech Republic</b>							
<b>All industries</b>	<b>1,038,039</b>	<b>1,654,306</b>	<b>293,596</b>	<b>559,394</b>	<b>253,405</b>	<b>43,187</b>	
Raw materials and energy production	d	d	d	d	d	d	
Goods production	539,531	868,750	146,104	413,529	* 190,609	30,343	
Distribution and transportation of goods	76,600	202,333	53,685	64,751	* 24,832	2,600	
Information	d	d	d	d	d	d	
Finance, insurance, real estate, and rental and leasing	318,796	404,852	68,868	* 29,460	* 14,630	* 2,872	
Services	79,617	149,592	21,658	44,704	* 23,075	* 1,225	
<b>Denmark</b>							
<b>All industries</b>	<b>1,723,168</b>	<b>2,624,897</b>	<b>373,601</b>	<b>897,554</b>	<b>270,026</b>	<b>78,589</b>	
Raw materials and energy production	* 22,851	* 34,389	* 7,720	0	0	0	
Goods production	621,139	834,373	88,080	285,406	* 50,872	37,752	
Distribution and transportation of goods	119,106	279,107	70,235	175,674	* 88,298	5,270	
Information	-4,310	17,391	3,341	* 247	0	* 5,075	
Finance, insurance, real estate, and rental and leasing	195,898	241,940	16,819	* 23,996	0	* 5,047	
Services	768,484	1,217,698	187,406	412,230	* 130,856	25,446	
<b>Finland</b>							
<b>All industries</b>	<b>276,227</b>	<b>691,005</b>	<b>109,840</b>	<b>310,157</b>	<b>69,387</b>	<b>62,193</b>	
Raw materials and energy production	0	0	0	0	0	0	
Goods production	154,068	275,920	53,441	125,425	* 36,858	26,338	
Distribution and transportation of goods	86,945	118,492	10,524	134,066	* 22,314	18,199	
Information	-1,081	12,395	1,536	* 8,572	* 1,954	* 2,207	
Finance, insurance, real estate, and rental and leasing	8,436	33,378	9,956	* 5,786	0	* 6,342	
Services	27,859	250,821	34,384	36,307	* 8,262	9,107	

Footnotes at end of table.

## Controlled Foreign Corporations, 2008

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**Table 3. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, and Subpart F Income, by Selected Country of Incorporation and Industrial Sector of Controlled Foreign Corporation, Tax Year 2008—Continued**

[All figures are estimates based on a sample—money amounts are in thousands of dollars]

Selected country of incorporation and industrial sector of Controlled Foreign Corporation	Controlled Foreign Corporations					Total Subpart F income	
	Current earnings and profits (less deficit) after income taxes	Foreign corporations with (+) current earnings and profits before income taxes		Distributions out of earnings and profits	Dividends paid to controlling U.S. corporation		
		Current earnings and profits before income taxes	Income taxes				
	(8)	(9)	(10)	(11)	(12)	(13)	
<b>France (incl. Corsica, Guadeloupe, Martinique, and Reunion)</b>							
<b>All industries [2]</b>	<b>11,208,580</b>	<b>17,597,658</b>	<b>3,078,900</b>	<b>7,393,485</b>	<b>1,366,567</b>	<b>1,940,024</b>	
Raw materials and energy production	d	d	d	d	d	d	
Goods production	3,465,995	5,688,536	968,214	2,624,168	294,599	745,239	
Distribution and transportation of goods	814,759	1,689,610	412,210	883,322	339,906	77,818	
Information	77,629	468,707	120,603	115,195	* 57,049	65,031	
Finance, insurance, real estate, and rental and leasing	2,947,931	3,620,764	534,755	1,295,760	0	118,265	
Services	3,873,310	6,089,079	1,038,530	2,470,143	669,963	933,107	
<b>Germany</b>							
<b>All industries [2]</b>	<b>12,189,670</b>	<b>21,990,185</b>	<b>3,282,406</b>	<b>12,860,375</b>	<b>1,467,428</b>	<b>1,656,711</b>	
Raw materials and energy production	72,273	93,611	* 16,627	* 35,215	* 24,594	* 1,214	
Goods production	2,890,197	7,577,899	1,526,127	3,712,152	601,844	706,297	
Distribution and transportation of goods	2,093,582	3,054,373	598,554	1,937,108	374,521	233,598	
Information	432,941	742,879	141,576	214,993	* 28,459	202,473	
Finance, insurance, real estate, and rental and leasing	1,734,443	2,520,564	469,116	1,281,162	* 260,596	214,930	
Services	4,966,261	8,000,860	530,406	5,679,746	177,413	298,199	
<b>Greece</b>							
<b>All industries</b>	<b>370,254</b>	<b>716,462</b>	<b>232,939</b>	<b>257,417</b>	<b>27,749</b>	<b>61,226</b>	
Raw materials and energy production	* -161	* 1,870	* 779	* 61	* 57	* 2	
Goods production	118,461	237,310	73,747	* 128,107	* 9,286	* 33,941	
Distribution and transportation of goods	161,846	295,440	105,166	66,408	* 11,122	* 22,451	
Information	-9,814	10,338	2,728	0	0	* 94	
Finance, insurance, real estate, and rental and leasing	57,298	86,895	29,154	* 31,702	* 634	* 3	
Services	42,625	84,609	21,366	31,139	* 6,650	* 4,736	
<b>Hong Kong</b>							
<b>All industries [2]</b>	<b>7,258,585</b>	<b>9,641,309</b>	<b>998,328</b>	<b>3,494,011</b>	<b>331,517</b>	<b>2,001,935</b>	
Raw materials and energy production	d	d	d	d	d	d	
Goods production	591,096	923,447	97,661	304,426	68,539	161,809	
Distribution and transportation of goods	1,607,686	1,989,822	233,174	1,206,033	135,241	468,057	
Information	5,116	57,925	4,820	* 142	* 144	* 8,754	
Finance, insurance, real estate, and rental and leasing	2,013,315	2,952,883	383,148	305,536	38,369	1,097,057	
Services	2,520,874	3,143,378	226,758	1,219,641	89,223	266,086	
<b>Hungary</b>							
<b>All industries</b>	<b>1,693,236</b>	<b>2,310,363</b>	<b>228,375</b>	<b>3,345,789</b>	<b>59,626</b>	<b>407,829</b>	
Raw materials and energy production	* -10,078	* 10,211	* 1,838	* 1,101	0	* 47	
Goods production	1,046,309	1,272,097	107,903	3,061,268	* 12,885	367,537	
Distribution and transportation of goods	188,592	254,173	36,436	108,478	* 21,513	* 4,190	
Information	39,632	60,012	4,053	* 2,850	* 349	* 2,109	
Finance, insurance, real estate, and rental and leasing	232,799	278,550	41,908	* 62,043	* 1,447	* 1,712	
Services	195,982	435,320	36,238	110,048	* 23,432	32,235	
<b>India</b>							
<b>All industries</b>	<b>3,571,116</b>	<b>5,632,953</b>	<b>1,165,969</b>	<b>1,062,878</b>	<b>537,476</b>	<b>180,305</b>	
Raw materials and energy production	65,374	103,812	* 29,508	* 25,403	* 12,876	* 2,930	
Goods production	1,010,126	1,713,351	495,964	323,136	169,892	29,336	
Distribution and transportation of goods	90,883	381,320	134,276	119,443	* 7,685	5,040	
Information	523,341	707,575	106,620	* 231,577	* 173,328	* 5,064	
Finance, insurance, real estate, and rental and leasing	433,581	722,646	112,316	* 194,582	* 164,477	76,292	
Services	1,447,810	2,004,249	287,284	168,737	* 9,217	61,644	

Footnotes at end of table.

## Controlled Foreign Corporations, 2008

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**Table 3. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, and Subpart F Income, by Selected Country of Incorporation and Industrial Sector of Controlled Foreign Corporation, Tax Year 2008—Continued**

[All figures are estimates based on a sample—money amounts are in thousands of dollars]

Selected country of incorporation and industrial sector of Controlled Foreign Corporation	Controlled Foreign Corporations					Total Subpart F income	
	Current earnings and profits (less deficit) after income taxes	Foreign corporations with (+) current earnings and profits before income taxes		Distributions out of earnings and profits	Dividends paid to controlling U.S. corporation		
		Current earnings and profits before income taxes	Income taxes				
(8)	(9)	(10)	(11)	(12)	(13)		
<b>Indonesia</b>							
<b>All industries</b>	<b>2,239,760</b>	<b>3,613,531</b>	<b>1,270,880</b>	<b>1,532,414</b>	<b>213,567</b>	<b>106,876</b>	
Raw materials and energy production	1,445,156	2,288,839	828,482	* 1,175,642	* 134,244	* 4,156	
Goods production	357,325	709,809	302,953	256,499	27,588	* 5,010	
Distribution and transportation of goods	63,612	114,856	35,762	40,563	* 14,364	* 146	
Information	-2,166	* 8,244	* 4,320	* 1,530	* 1,170	* 1,257	
Finance, insurance, real estate, and rental and leasing	319,846	400,402	71,577	* 45,622	* 26,060	* 94,756	
Services	55,987	91,380	27,786	* 12,557	* 10,140	* 1,552	
<b>Ireland</b>							
<b>All industries</b>	<b>56,964,128</b>	<b>66,492,981</b>	<b>3,172,032</b>	<b>13,401,191</b>	<b>1,184,753</b>	<b>11,317,164</b>	
Raw materials and energy production	* -922	* 549	* 301	0	0	* 173	
Goods production	12,716,000	13,933,384	526,952	2,382,073	* 273,636	665,214	
Distribution and transportation of goods	2,782,059	3,019,144	138,319	323,831	* 70,385	314,885	
Information	6,720,732	7,064,291	209,260	* 329,874	* 4,560	* 347,921	
Finance, insurance, real estate, and rental and leasing	15,480,995	21,264,002	877,149	4,005,046	* 323,826	8,604,735	
Services	19,265,263	21,211,612	1,420,051	6,360,367	* 512,346	1,384,236	
<b>Israel</b>							
<b>All industries [2]</b>	<b>62,422</b>	<b>1,898,552</b>	<b>276,408</b>	<b>464,409</b>	<b>65,555</b>	<b>223,169</b>	
Raw materials and energy production	d	d	d	d	d	d	
Goods production	108,366	1,114,432	169,490	* 293,661	* 46,608	142,063	
Distribution and transportation of goods	68,738	109,920	23,527	* 39,724	* 17,215	* 2,207	
Information	-33,791	35,821	2,483	* 111	0	* 422	
Finance, insurance, real estate, and rental and leasing	23,079	47,679	* 9,786	* 11,225	0	* 4,151	
Services	-83,525	590,489	71,121	119,688	* 1,732	74,326	
<b>Italy</b>							
<b>All industries [2]</b>	<b>3,576,080</b>	<b>7,357,435</b>	<b>1,828,267</b>	<b>5,844,373</b>	<b>1,058,600</b>	<b>943,827</b>	
Raw materials and energy production	d	d	d	d	d	d	
Goods production	1,941,181	3,769,879	836,535	4,832,478	807,849	818,598	
Distribution and transportation of goods	520,869	1,212,664	432,174	289,294	109,378	41,621	
Information	180,132	353,101	86,964	* 49,161	* 32,394	8,937	
Finance, insurance, real estate, and rental and leasing	46	495,582	147,525	160,795	* 5,328	59,876	
Services	906,071	1,481,508	314,154	512,645	103,652	14,252	
<b>Japan (including Okinawa and Ryukyu Islands)</b>							
<b>All industries [2]</b>	<b>549,759</b>	<b>19,937,257</b>	<b>5,307,133</b>	<b>8,874,490</b>	<b>2,191,128</b>	<b>2,388,537</b>	
Raw materials and energy production	* 6,507	* 13,748	* 7,241	* 16,839	* 105	0	
Goods production	984,856	5,880,633	2,176,431	3,042,827	594,022	690,180	
Distribution and transportation of goods	987,725	2,730,012	973,555	2,273,078	870,222	315,180	
Information	291,489	688,325	271,697	* 228,568	* 150,503	187,464	
Finance, insurance, real estate, and rental and leasing	-5,259,993	6,109,734	1,224,004	743,601	* 147,272	180,478	
Services	3,539,053	4,514,680	654,202	2,569,577	429,002	1,015,234	
<b>Luxembourg</b>							
<b>All industries</b>	<b>27,961,870</b>	<b>33,846,150</b>	<b>2,682,007</b>	<b>17,614,005</b>	<b>5,458,157</b>	<b>4,684,126</b>	
Raw materials and energy production	* 240,019	* 292,365	* 51,204	0	0	* 9,172	
Goods production	3,950,930	4,267,467	265,757	805,042	* 357,922	197,377	
Distribution and transportation of goods	3,894,720	4,266,038	365,063	* 2,290,673	* 26,061	604,085	
Information	520,070	816,520	* 107,374	* 990	0	* 122,350	
Finance, insurance, real estate, and rental and leasing	2,200,172	3,891,903	92,588	1,471,332	* 4	1,618,525	
Services	17,155,959	20,311,856	1,800,022	13,045,968	5,074,170	2,132,617	

Footnotes at end of table.

## Controlled Foreign Corporations, 2008

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**Table 3. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, and Subpart F Income, by Selected Country of Incorporation and Industrial Sector of Controlled Foreign Corporation, Tax Year 2008—Continued**

[All figures are estimates based on a sample—money amounts are in thousands of dollars]

Selected country of incorporation and industrial sector of Controlled Foreign Corporation	Controlled Foreign Corporations					
	Current earnings and profits (less deficit) after income taxes	Foreign corporations with (+) current earnings and profits before income taxes		Distributions out of earnings and profits	Dividends paid to controlling U.S. corporation	Total Subpart F income
		Current earnings and profits before income taxes	Income taxes			
	(8)	(9)	(10)	(11)	(12)	(13)
<b>Malaysia</b>						
<b>All industries [2]</b>	<b>1,703,044</b>	<b>2,251,969</b>	<b>318,779</b>	<b>787,329</b>	<b>199,653</b>	<b>112,964</b>
Raw materials and energy production	d	d	d	d	d	d
Goods production	857,442	1,031,972	96,711	409,552	57,413	61,988
Distribution and transportation of goods	278,442	380,345	76,010	205,367	73,619	25,476
Information	1,478	9,194	690	* 1,592	* 314	* 796
Finance, insurance, real estate, and rental and leasing	378,572	484,135	86,701	* 213	0	5,224
Services	166,722	308,070	49,915	162,060	* 66,306	18,326
<b>Mauritius</b>						
<b>All industries [2]</b>	<b>885,798</b>	<b>1,385,788</b>	<b>194,637</b>	<b>1,027,386</b>	<b>615,514</b>	<b>414,392</b>
Raw materials and energy production	d	d	d	d	d	d
Goods production	16,401	* 30,581	* 4,572	* 3,144	* 3,210	* 903
Distribution and transportation of goods	13,575	* 16,024	* 1,811	0	0	0
Information	5,231	* 7,851	* 2,012	* 2,567	0	* 2,456
Finance, insurance, real estate, and rental and leasing	-20,740	223,299	* 2,718	* 11,531	* 576	156,297
Services	626,944	771,557	91,747	560,145	166,102	250,372
<b>Mexico</b>						
<b>All industries [2]</b>	<b>13,512,534</b>	<b>21,825,305</b>	<b>4,217,434</b>	<b>7,846,701</b>	<b>2,099,152</b>	<b>2,149,012</b>
Raw materials and energy production	541,642	1,065,697	279,893	* 390,779	* 9,998	* 6,546
Goods production	3,248,097	6,095,451	1,163,579	2,144,998	443,619	616,544
Distribution and transportation of goods	2,741,822	4,412,477	1,138,985	1,964,883	311,958	101,987
Information	309,356	757,231	143,842	* 30,037	* 2,771	34,343
Finance, insurance, real estate, and rental and leasing	2,665,390	4,459,615	1,059,595	785,425	235,986	947,525
Services	4,006,427	5,034,827	431,538	2,530,579	1,094,821	442,067
<b>Netherlands</b>						
<b>All industries</b>	<b>81,847,869</b>	<b>102,320,462</b>	<b>11,949,021</b>	<b>53,731,071</b>	<b>8,390,855</b>	<b>6,711,143</b>
Raw materials and energy production	3,534,235	6,073,327	2,242,030	* 72,988	0	66,320
Goods production	13,246,113	16,456,856	1,745,234	7,067,414	617,718	1,306,585
Distribution and transportation of goods	9,368,480	10,438,175	715,852	4,365,642	173,610	279,601
Information	4,356,474	6,398,392	1,718,458	* 267,844	* 136,965	102,409
Finance, insurance, real estate, and rental and leasing	3,844,210	4,712,596	153,977	1,920,098	* 111,807	600,082
Services	47,498,357	58,241,116	5,373,470	40,037,085	7,350,755	4,356,147
<b>New Zealand</b>						
<b>All industries [2]</b>	<b>650,959</b>	<b>1,204,739</b>	<b>264,808</b>	<b>514,441</b>	<b>133,942</b>	<b>229,470</b>
Raw materials and energy production	d	d	d	d	d	d
Goods production	164,402	288,450	70,253	222,524	67,382	8,372
Distribution and transportation of goods	68,533	179,594	43,005	35,710	28,213	8,284
Information	25,808	35,925	6,692	* 65,696	* 5,148	* 289
Finance, insurance, real estate, and rental and leasing	312,552	441,426	104,708	88,755	* 2,103	187,299
Services	113,231	215,191	34,924	80,027	* 30,174	25,224
<b>Norway</b>						
<b>All industries</b>	<b>1,941,204</b>	<b>6,600,649</b>	<b>4,004,166</b>	<b>1,639,846</b>	<b>1,050,098</b>	<b>169,555</b>
Raw materials and energy production	1,606,921	* 5,397,845	* 3,778,464	* 1,075,038	* 987,626	* 86,318
Goods production	20,834	146,530	40,662	* 196,474	* 14,014	* 4,260
Distribution and transportation of goods	268,827	397,343	77,220	167,523	* 39,994	29,785
Information	4,191	13,418	3,856	0	0	* 1,226
Finance, insurance, real estate, and rental and leasing	39,617	72,351	* 10,768	* 4,030	0	* 34,405
Services	814	573,161	93,195	196,781	* 8,463	13,562

Footnotes at end of table.

# Controlled Foreign Corporations, 2008

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**Table 3. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, and Subpart F Income, by Selected Country of Incorporation and Industrial Sector of Controlled Foreign Corporation, Tax Year 2008—Continued**

[All figures are estimates based on a sample—money amounts are in thousands of dollars]

Selected country of incorporation and industrial sector of Controlled Foreign Corporation	Controlled Foreign Corporations					
	Current earnings and profits (less deficit) after income taxes	Foreign corporations with (+) current earnings and profits before income taxes		Distributions out of earnings and profits	Dividends paid to controlling U.S. corporation	Total Subpart F income
		Current earnings and profits before income taxes	Income taxes			
	(8)	(9)	(10)	(11)	(12)	(13)
<b>Panama (including Canal Zone)</b>						
<b>All industries</b>	<b>1,603,936</b>	<b>1,912,669</b>	<b>225,216</b>	<b>1,199,184</b>	<b>330,844</b>	<b>249,694</b>
Raw materials and energy production	170,325	* 247,392	* 59,149	* 122,626	0	* 7,747
Goods production	183,318	204,106	13,911	* 17,338	* 2,936	* 41,471
Distribution and transportation of goods	499,370	607,631	83,743	220,549	* 2,845	35,012
Information	* 780	* 1,481	* 262	0	0	* 189
Finance, insurance, real estate, and rental and leasing	284,724	302,901	4,349	125,605	* 1,520	31,210
Services	465,420	549,159	63,801	* 713,066	* 323,542	134,065
<b>Peru</b>						
<b>All industries [2]</b>	<b>1,121,683</b>	<b>1,888,999</b>	<b>621,610</b>	<b>1,394,574</b>	<b>562,310</b>	<b>64,653</b>
Raw materials and energy production	844,339	1,308,040	462,311	* 1,109,847	* 479,644	* 53,335
Goods production	42,175	175,600	58,628	* 27,438	* 26,012	* 1,152
Distribution and transportation of goods	40,802	96,259	33,328	* 42,310	* 17,370	* 331
Information	d	d	d	d	d	d
Finance, insurance, real estate, and rental and leasing	71,770	111,766	38,184	* 47,716	* 37,947	* 3,228
Services	132,750	192,131	27,477	* 166,511	* 1,337	* 6,173
<b>Philippines</b>						
<b>All industries</b>	<b>970,842</b>	<b>1,520,521</b>	<b>309,325</b>	<b>491,109</b>	<b>242,910</b>	<b>84,265</b>
Raw materials and energy production	78,332	* 112,475	* 31,317	* 2,298	0	* 216
Goods production	459,963	704,545	173,453	241,267	135,709	* 2,198
Distribution and transportation of goods	46,687	79,114	24,106	58,211	32,917	* 133
Information	11,392	23,079	1,615	* 7,517	* 51	* 3,522
Finance, insurance, real estate, and rental and leasing	100,236	262,322	42,863	24,903	* 394	46,545
Services	274,232	338,987	35,971	156,913	* 73,839	31,651
<b>Poland</b>						
<b>All industries</b>	<b>2,695,669</b>	<b>4,002,791</b>	<b>811,962</b>	<b>1,475,178</b>	<b>721,145</b>	<b>192,439</b>
Raw materials and energy production	-78	* 3,141	* 711	0	0	* 8
Goods production	1,189,559	1,753,232	313,985	922,018	464,575	94,741
Distribution and transportation of goods	475,212	631,888	119,611	186,884	49,140	4,620
Information	7,814	26,971	5,004	* 8,374	* 6,364	* 5,118
Finance, insurance, real estate, and rental and leasing	941,452	1,334,163	328,985	267,438	* 169,854	87,048
Services	81,710	253,395	43,667	90,464	* 31,213	* 904
<b>Portugal (including Azores)</b>						
<b>All industries</b>	<b>1,647,205</b>	<b>2,201,063</b>	<b>282,263</b>	<b>867,085</b>	<b>77,136</b>	<b>1,926,324</b>
Raw materials and energy production	* 292	* 1,746	* 489	0	0	0
Goods production	121,473	289,133	74,284	345,324	* 10,460	15,225
Distribution and transportation of goods	324,723	503,972	133,033	155,898	* 1,653	* 45,949
Information	-26,866	23,904	7,401	* 13,681	* 9,421	* 33
Finance, insurance, real estate, and rental and leasing	-12,918	50,386	12,327	* 24,745	* 937	* 4,334
Services	1,240,501	1,331,923	54,729	327,438	* 54,666	* 1,860,784
<b>Puerto Rico</b>						
<b>All industries</b>	<b>6,151,947</b>	<b>6,639,463</b>	<b>261,853</b>	<b>471,492</b>	<b>197,095</b>	<b>272,655</b>
Raw materials and energy production	* 22,294	* 22,353	* 59	0	0	* 5,237
Goods production	1,270,007	1,352,482	31,250	170,858	* 70,179	121,220
Distribution and transportation of goods	90,377	258,856	97,250	* 52,543	* 40,371	73,161
Information	-45,948	30,575	* 7,850	* 5,500	* 2,399	* 17,150
Finance, insurance, real estate, and rental and leasing	350,534	425,626	63,589	186,591	* 83,890	* 5,888
Services	4,464,683	4,549,571	61,855	* 56,000	* 255	49,999

Footnotes at end of table.

## Controlled Foreign Corporations, 2008

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**Table 3. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, and Subpart F Income, by Selected Country of Incorporation and Industrial Sector of Controlled Foreign Corporation, Tax Year 2008—Continued**

[All figures are estimates based on a sample—money amounts are in thousands of dollars]

Selected country of incorporation and industrial sector of Controlled Foreign Corporation	Controlled Foreign Corporations					Total Subpart F income	
	Current earnings and profits (less deficit) after income taxes	Foreign corporations with (+) current earnings and profits before income taxes		Distributions out of earnings and profits	Dividends paid to controlling U.S. corporation		
		Current earnings and profits before income taxes	Income taxes				
	(8)	(9)	(10)	(11)	(12)	(13)	
<b>Romania</b>							
<b>All industries</b>	<b>135,458</b>	<b>597,054</b>	<b>90,816</b>	<b>163,555</b>	<b>* 20,605</b>	<b>21,198</b>	
Raw materials and energy production	d	d	d	d	d	d	
Goods production	99,033	365,527	50,674	* 110,225	* 2,393	* 10,362	
Distribution and transportation of goods	65,694	92,049	17,347	* 28,002	* 15,498	* 6,562	
Information	d	d	d	d	d	d	
Finance, insurance, real estate, and rental and leasing	33,369	81,184	13,949	* 4,538	* 1,710	* 3,283	
Services	15,694	34,311	5,769	* 19,099	0	* 5	
<b>Russia</b>							
<b>All industries [2]</b>	<b>2,057,242</b>	<b>3,688,381</b>	<b>899,550</b>	<b>1,088,572</b>	<b>108,704</b>	<b>40,014</b>	
Raw materials and energy production	d	d	d	d	d	d	
Goods production	737,758	1,572,158	371,456	927,785	* 36,464	* 17,180	
Distribution and transportation of goods	220,963	488,864	186,848	58,111	* 72	* 3,732	
Information	676,128	876,944	160,105	29,900	9,398	* 9,542	
Finance, insurance, real estate, and rental and leasing	332,598	495,028	106,238	0	0	* 5,090	
Services	104,073	218,127	65,099	72,756	* 62,770	* 4,288	
<b>Singapore</b>							
<b>All industries [2]</b>	<b>12,699,194</b>	<b>15,045,603</b>	<b>1,041,674</b>	<b>9,195,843</b>	<b>844,955</b>	<b>1,338,077</b>	
Raw materials and energy production	d	d	d	d	d	d	
Goods production	3,278,107	4,167,531	267,809	2,020,495	478,579	686,416	
Distribution and transportation of goods	1,819,311	2,110,547	199,772	3,833,168	208,274	339,091	
Information	91,689	163,758	10,971	* 82,013	* 41,448	* 7,018	
Finance, insurance, real estate, and rental and leasing	1,896,474	2,214,239	234,378	606,482	* 7,154	86,541	
Services	5,106,615	5,822,389	287,834	2,650,658	109,501	211,039	
<b>Slovakia</b>							
<b>All industries</b>	<b>167,356</b>	<b>334,978</b>	<b>55,862</b>	<b>137,342</b>	<b>63,664</b>	<b>6,185</b>	
Raw materials and energy production	d	d	d	d	d	d	
Goods production	22,106	112,670	17,745	57,812	* 12,254	* 815	
Distribution and transportation of goods	42,028	58,967	10,168	* 50,907	* 47,658	0	
Information	d	d	d	d	d	d	
Finance, insurance, real estate, and rental and leasing	46,378	79,847	16,657	* 3,566	* 3,207	* 4,081	
Services	49,900	73,537	11,037	25,057	* 545	0	
<b>South Africa</b>							
<b>All industries [2]</b>	<b>1,334,670</b>	<b>1,962,723</b>	<b>391,531</b>	<b>820,027</b>	<b>227,709</b>	<b>116,015</b>	
Raw materials and energy production	d	d	d	d	d	d	
Goods production	507,549	811,124	160,695	185,531	80,728	30,439	
Distribution and transportation of goods	125,303	241,912	76,442	* 26,581	* 9,617	6,569	
Information	32,855	48,033	13,119	* 15,829	* 3,807	* 1,667	
Finance, insurance, real estate, and rental and leasing	412,415	494,784	73,662	362,140	* 24,748	58,447	
Services	220,618	323,449	65,009	225,068	103,715	18,120	
<b>South Korea</b>							
<b>All industries</b>	<b>4,042,412</b>	<b>7,354,627</b>	<b>1,482,624</b>	<b>2,389,392</b>	<b>558,691</b>	<b>450,516</b>	
Raw materials and energy production	* 62,746	* 75,371	* 12,608	* 2,139	0	* 2,054	
Goods production	2,467,258	4,310,717	539,881	1,260,166	150,608	246,583	
Distribution and transportation of goods	329,283	705,443	246,635	414,471	111,202	33,090	
Information	1,631	108,702	21,152	* 41,227	* 31,533	* 28,208	
Finance, insurance, real estate, and rental and leasing	1,150,130	1,818,655	512,824	397,074	* 132,092	122,978	
Services	31,366	335,738	149,524	274,315	133,257	17,604	

Footnotes at end of table.

## Controlled Foreign Corporations, 2008

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**Table 3. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, and Subpart F Income, by Selected Country of Incorporation and Industrial Sector of Controlled Foreign Corporation, Tax Year 2008—Continued**

[All figures are estimates based on a sample—money amounts are in thousands of dollars]

Selected country of incorporation and industrial sector of Controlled Foreign Corporation	Controlled Foreign Corporations					
	Current earnings and profits (less deficit) after income taxes	Foreign corporations with (+) current earnings and profits before income taxes		Distributions out of earnings and profits	Dividends paid to controlling U.S. corporation	Total Subpart F income
		Current earnings and profits before income taxes	Income taxes			
	(8)	(9)	(10)	(11)	(12)	(13)
<b>Spain (including Canary Isles)</b>						
<b>All industries</b>	<b>11,334,288</b>	<b>16,345,032</b>	<b>2,542,784</b>	<b>7,701,340</b>	<b>4,409,831</b>	<b>752,077</b>
Raw materials and energy production	17,265	30,557	* 4,887	* 52,341	* 704	* 1,481
Goods production	2,308,408	4,579,316	775,559	2,191,963	579,464	319,153
Distribution and transportation of goods	728,477	1,205,574	301,962	508,326	81,741	51,764
Information	77,246	230,229	57,275	* 103,648	* 20,947	9,058
Finance, insurance, real estate, and rental and leasing	1,016,087	1,723,721	421,445	504,184	* 12,498	116,847
Services	7,186,805	8,575,635	981,655	4,340,880	3,714,477	253,774
<b>Sweden</b>						
<b>All industries</b>	<b>225,070</b>	<b>3,935,628</b>	<b>567,307</b>	<b>1,130,098</b>	<b>266,141</b>	<b>339,877</b>
Raw materials and energy production	* 2,014	* 2,743	* 509	0	0	0
Goods production	-63,301	995,436	192,675	531,183	88,625	80,104
Distribution and transportation of goods	137,315	355,517	79,599	158,308	* 17,412	32,713
Information	34,809	86,670	22,168	* 33,706	* 7,331	* 8,426
Finance, insurance, real estate, and rental and leasing	860,601	974,713	62,338	* 59,146	* 5,002	107,929
Services	-746,368	1,520,549	210,018	347,754	147,771	110,704
<b>Switzerland</b>						
<b>All industries [2]</b>	<b>44,978,249</b>	<b>49,829,168</b>	<b>3,058,041</b>	<b>17,635,887</b>	<b>4,226,515</b>	<b>4,745,273</b>
Raw materials and energy production	d	d	d	d	d	d
Goods production	14,693,736	16,328,225	1,380,744	4,026,769	105,090	1,348,504
Distribution and transportation of goods	7,359,214	8,445,242	860,331	4,015,142	85,198	2,043,572
Information	1,963,852	2,074,288	81,733	* 392,257	0	96,466
Finance, insurance, real estate, and rental and leasing	761,888	1,221,993	103,933	446,163	* 55,564	376,848
Services	20,007,286	21,555,092	619,331	8,462,501	3,980,664	862,464
<b>Taiwan</b>						
<b>All industries [2]</b>	<b>995,928</b>	<b>2,500,466</b>	<b>515,944</b>	<b>985,751</b>	<b>276,551</b>	<b>63,643</b>
Raw materials and energy production	0	0	0	0	0	0
Goods production	889,749	1,460,747	277,763	697,983	126,468	32,827
Distribution and transportation of goods	116,532	229,790	48,516	95,200	53,381	10,598
Information	d	d	d	d	d	d
Finance, insurance, real estate, and rental and leasing	-136,321	498,361	101,058	* 55,437	* 26,964	* 9,576
Services	125,158	301,356	85,745	128,149	66,967	10,522
<b>Thailand</b>						
<b>All industries [2]</b>	<b>693,881</b>	<b>1,950,917</b>	<b>463,879</b>	<b>953,564</b>	<b>551,551</b>	<b>334,009</b>
Raw materials and energy production	269,773	402,219	* 128,877	* 92,163	* 49,564	* 798
Goods production	-5,051	820,639	156,668	689,188	362,974	28,257
Distribution and transportation of goods	156,404	261,127	73,138	49,259	40,263	5,772
Information	d	d	d	d	d	d
Finance, insurance, real estate, and rental and leasing	104,128	212,275	44,402	17,419	* 9,849	290,598
Services	169,135	247,367	58,651	91,353	76,204	5,083
<b>Turkey</b>						
<b>All industries [2]</b>	<b>2,674,413</b>	<b>3,568,113</b>	<b>482,902</b>	<b>1,090,670</b>	<b>286,087</b>	<b>1,354,249</b>
Raw materials and energy production	-23,005	* 4,447	* 320	* 95	0	0
Goods production	1,089,986	1,511,720	335,370	792,171	* 270,494	74,279
Distribution and transportation of goods	309,660	426,392	57,825	* 60,224	* 2,315	18,349
Information	d	d	d	d	d	d
Finance, insurance, real estate, and rental and leasing	76,727	178,432	* 14,626	* 13,311	* 11,290	* 884
Services	1,216,781	1,436,676	74,683	224,869	* 1,989	1,260,736

Footnotes at end of table.

## Controlled Foreign Corporations, 2008

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**Table 3. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, and Subpart F Income, by Selected Country of Incorporation and Industrial Sector of Controlled Foreign Corporation, Tax Year 2008—Continued**

[All figures are estimates based on a sample—money amounts are in thousands of dollars]

Selected country of incorporation and industrial sector of Controlled Foreign Corporation	Controlled Foreign Corporations					Total Subpart F income	
	Current earnings and profits (less deficit) after income taxes	Foreign corporations with (+) current earnings and profits before income taxes		Distributions out of earnings and profits	Dividends paid to controlling U.S. corporation		
		Current earnings and profits before income taxes	Income taxes				
	(8)	(9)	(10)	(11)	(12)	(13)	
<b>United Kingdom and Northern Ireland (including Gibraltar)</b>							
All industries [2]	1,674,134	90,038,203	10,110,694	37,657,916	4,820,662	9,702,236	
Raw materials and energy production	3,768,656	6,594,061	2,544,124	* 1,796,238	0	387,443	
Goods production	558,740	8,895,708	1,343,448	3,853,828	722,798	693,481	
Distribution and transportation of goods	2,824,452	5,283,253	935,854	1,942,607	252,197	542,276	
Information	1,518,352	3,418,361	374,490	670,341	92,398	129,512	
Finance, insurance, real estate, and rental and leasing	-19,536,441	40,029,845	3,317,575	16,746,459	2,564,043	4,480,914	
Services	12,540,539	25,816,973	1,595,203	12,644,023	1,185,954	3,468,609	
<b>Venezuela</b>							
All industries	1,810,931	2,755,744	789,491	621,149	249,953	92,012	
Raw materials and energy production	106,792	153,774	23,177	* 91,460	* 2,508	* 2,476	
Goods production	1,125,649	1,696,040	484,606	407,319	157,261	73,982	
Distribution and transportation of goods	408,662	657,999	226,569	74,019	* 48,512	* 5,422	
Information	20,821	27,788	* 3,478	0	0	* 390	
Finance, insurance, real estate, and rental and leasing	92,964	120,126	20,903	* 12,404	* 9,549	* 4,318	
Services	56,042	100,018	30,761	* 35,947	* 32,124	5,425	
<b>European Union, total</b>							
All industries [2]	221,451,053	383,358,292	43,195,159	170,743,134	32,205,606	41,745,576	
Raw materials and energy production	7,711,962	13,256,761	4,892,367	1,966,521	* 30,406	467,416	
Goods production	46,546,067	75,028,759	9,585,647	36,695,550	7,169,276	6,632,373	
Distribution and transportation of goods	25,521,899	34,511,014	4,933,118	14,263,898	1,782,030	2,423,467	
Information	14,227,090	20,475,141	2,939,746	1,881,728	413,731	1,034,471	
Finance, insurance, real estate, and rental and leasing	11,002,084	82,626,015	6,732,747	28,088,470	3,541,227	16,172,085	
Services	116,442,581	157,460,600	14,111,534	87,842,547	19,265,664	15,015,764	
<b>OPEC countries, total</b>							
All industries [2]	6,833,668	11,399,530	4,047,289	3,815,167	1,770,717	334,482	
Raw materials and energy production	3,208,439	6,037,465	2,683,347	2,484,639	1,325,325	9,145	
Goods production	1,839,661	2,858,628	836,217	795,196	219,591	108,547	
Distribution and transportation of goods	828,644	1,204,161	305,803	279,282	95,786	83,105	
Information	d	d	d	d	d	d	
Finance, insurance, real estate, and rental and leasing	532,843	703,971	126,331	115,505	* 78,648	103,128	
Services	334,776	480,306	87,381	138,547	50,196	28,911	

d—Not shown to avoid disclosure of information on specific corporations. However, the data are included in the appropriate totals.

\* Data should be used with caution because of the small number of returns on which they are based.

[1] Number of returns is not additive because some U.S. corporations had Controlled Foreign Corporations in more than one industrial sector. The industrial activity of the parent corporation filing the return often differs from that of the Controlled Foreign Corporations.

[2] Includes "Nature of business not allocable," not shown separately.

NOTE: Detail may not add to totals because of rounding and because data are shown for selected countries only.

## Controlled Foreign Corporations, 2008

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**Table 4. Controlled Foreign Corporations and Their Foreign Disregarded Entities: Number, End-of-Year Total Assets, and Current Earnings and Profits (Less Deficit) After Income Taxes, by Selected Country of Incorporation, Tax Year 2008**

[All figures are estimates based on a sample—money amounts are in thousands of dollars]

Selected country of incorporation of Controlled Foreign Corporation and Foreign Disregarded Entity	Number of foreign entities	End-of-year total assets	Current earnings and profits (less deficit) after taxes
			(1)
<b>Austria: CFCs</b>	<b>527</b>	<b>25,621,912</b>	<b>1,199,152</b>
All FDEs	82	6,533,484	638,904
Austria	31	3,196,756	493,906
Other countries	51	3,336,728	144,998
<b>Bahamas: CFCs</b>	<b>372</b>	<b>94,654,076</b>	<b>13,780,620</b>
All FDEs	116	12,329,500	4,718,888
Bahamas	58	6,236,141	4,536,695
Other countries	58	6,093,359	182,192
<b>Barbados: CFCs</b>	<b>179</b>	<b>13,545,672</b>	<b>-464,211</b>
All FDEs	59	5,065,357	199,401
Barbados	4	932,289	103,091
Other countries	55	4,133,068	96,310
<b>Belgium: CFCs</b>	<b>1,222</b>	<b>111,436,943</b>	<b>2,661,920</b>
All FDEs	69	7,406,565	112,420
Belgium	19	2,529,982	20,425
Other countries	50	4,876,583	91,996
<b>Bermuda: CFCs</b>	<b>1,008</b>	<b>841,173,421</b>	<b>58,498,985</b>
All FDEs	1,661	553,831,950	33,735,880
Bermuda	162	81,527,302	11,030,356
Other countries	1,500	472,304,648	22,705,524
<b>British Virgin Islands: CFCs</b>	<b>419</b>	<b>57,203,719</b>	<b>7,132,590</b>
All FDEs	182	27,479,274	3,604,416
British Virgin Islands	34	4,051,853	105,471
Other countries	148	23,427,420	3,498,945
<b>Canada: CFCs</b>	<b>6,829</b>	<b>960,207,182</b>	<b>35,596,454</b>
All FDEs	498	173,750,101	7,324,074
Canada	242	119,335,754	5,860,501
Other countries	256	54,414,347	1,463,573
<b>Cayman Islands: CFCs</b>	<b>1,677</b>	<b>725,242,367</b>	<b>35,262,715</b>
All FDEs	1,384	271,226,813	19,260,201
Cayman Islands	279	78,006,678	4,932,221
Other countries	1,105	193,220,135	14,327,980
<b>China: CFCs</b>	<b>4,546</b>	<b>126,366,421</b>	<b>7,277,701</b>
All FDEs	126	10,609,302	2,184,371
China	89	6,036,199	189,766
Other countries	37	4,573,103	1,994,604
<b>Cyprus: CFCs</b>	<b>138</b>	<b>10,730,030</b>	<b>605,545</b>
All FDEs	120	2,782,107	241,120
Cyprus	5	40,424	987
Other countries	115	2,741,683	240,132
<b>Denmark: CFCs</b>	<b>693</b>	<b>44,507,017</b>	<b>1,723,168</b>
All FDEs	79	9,717,320	479,643
Denmark	28	6,636,351	84,671
Other countries	51	3,080,969	394,973
<b>France (including Corsica, Guadeloupe, Martinique, and Reunion): CFCs</b>	<b>3,522</b>	<b>308,582,059</b>	<b>11,208,580</b>
All FDEs	390	73,555,110	2,506,586
France (including Corsica, Guadeloupe, Martinique, and Reunion)	327	67,096,010	2,284,629
Other countries	63	6,459,100	221,958
<b>Hong Kong: CFCs</b>	<b>2,368</b>	<b>139,476,844</b>	<b>7,258,585</b>
All FDEs	327	42,650,289	478,572
Hong Kong	100	12,807,874	-62,931
Other countries	227	29,842,415	541,502

Footnotes at end of table.

# Controlled Foreign Corporations, 2008

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**Table 4. Controlled Foreign Corporations and Their Foreign Disregarded Entities: Number, End-of-Year Total Assets, and Current Earnings and Profits (Less Deficit) After Income Taxes, by Selected Country of Incorporation, Tax Year 2008—Continued**

[All figures are estimates based on a sample—money amounts are in thousands of dollars]

Selected country of incorporation of Controlled Foreign Corporation and Foreign Disregarded Entity	Number of foreign entities	End-of-year total assets	Current earnings and profits (less deficit) after taxes
	(1)	(2)	(3)
<b>Ireland: CFCs</b>	<b>1,202</b>	<b>735,862,289</b>	<b>56,964,128</b>
All FDEs	1,044	232,717,986	33,357,934
Ireland	267	170,619,948	27,600,455
Other countries	776	62,098,038	5,757,479
<b>Israel: CFCs</b>	<b>893</b>	<b>31,049,596</b>	<b>62,422</b>
All FDEs	24	1,824,675	69,267
Israel	13	912,702	23,380
Other countries	11	911,973	45,887
<b>Italy: CFCs</b>	<b>1,665</b>	<b>98,266,680</b>	<b>3,576,080</b>
All FDEs	75	12,945,249	756,737
Italy	51	8,220,579	352,762
Other countries	24	4,724,670	403,975
<b>Jersey: CFCs</b>	<b>101</b>	<b>49,970,367</b>	<b>538,322</b>
All FDEs	32	47,563,000	175,764
Jersey	5	7,403,962	126,336
Other countries	27	40,159,038	49,427
<b>Luxembourg: CFCs</b>	<b>681</b>	<b>828,469,211</b>	<b>27,961,870</b>
All FDEs	1,478	458,159,529	23,653,549
Luxembourg	196	116,431,157	3,423,407
Other countries	1,282	341,728,371	20,230,142
<b>Mauritius: CFCs</b>	<b>335</b>	<b>29,915,151</b>	<b>885,798</b>
All FDEs	107	10,982,702	242,506
Mauritius	30	3,766,260	55,326
Other countries	77	7,216,443	187,179
<b>Netherland Antilles: CFCs</b>	<b>117</b>	<b>91,403,297</b>	<b>1,218,553</b>
All FDEs	86	13,179,569	281,093
Netherland Antilles	6	1,768,647	25,504
Other countries	80	11,410,922	255,589
<b>Netherlands: CFCs</b>	<b>3,505</b>	<b>1,530,361,553</b>	<b>81,847,869</b>
All FDEs	3,638	874,406,308	43,002,543
Netherlands	805	281,878,948	20,113,047
Other countries	2,833	592,527,361	22,889,495
<b>Panama (including Canal Zone): CFCs</b>	<b>282</b>	<b>19,430,783</b>	<b>1,603,936</b>
All FDEs	59	2,233,981	287,203
Panama (including Canal Zone): CFCs	8	62,340	885
Other countries	51	2,171,641	286,319
<b>Portugal (including Azores): CFCs</b>	<b>419</b>	<b>28,559,203</b>	<b>1,647,205</b>
All FDEs	35	3,032,712	1,171,102
Portugal (including Azores)	6	12,814	-1,233
Other countries	29	3,019,899	1,172,335
<b>Singapore: CFCs</b>	<b>1,843</b>	<b>187,225,044</b>	<b>12,699,194</b>
All FDEs	246	41,044,303	4,382,066
Singapore	53	8,207,980	860,580
Other countries	193	32,836,322	3,521,485
<b>Spain (including Canary Isles): CFCs</b>	<b>1,785</b>	<b>177,768,246</b>	<b>11,334,288</b>
All FDEs	397	40,446,746	1,000,579
Spain (including Canary Isles)	46	4,110,026	-105,382
Other countries	351	36,336,720	1,105,962

Footnotes at end of table.

## Controlled Foreign Corporations, 2008

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**Table 4. Controlled Foreign Corporations and Their Foreign Disregarded Entities: Number, End-of-Year Total Assets, and Current Earnings and Profits (Less Deficit) After Income Taxes, by Selected Country of Incorporation, Tax Year 2008—Continued**

[All figures are estimates based on a sample—money amounts are in thousands of dollars]

Selected country of incorporation of Controlled Foreign Corporation and Foreign Disregarded Entity	Number of foreign entities	End-of-year total assets	Current earnings and profits (less deficit) after taxes
			(1) (2) (3)
<b>Sweden: CFCs</b>			
All FDEs	1,052	<b>106,956,533</b>	<b>225,070</b>
Sweden	201	11,548,802	237,807
Other countries	145	8,792,541	22,807
<b>Switzerland: CFCs</b>			
All FDEs	1,411	<b>505,771,402</b>	<b>44,978,249</b>
Switzerland	962	134,733,248	12,708,358
Other countries	113	49,337,357	6,750,752
<b>United Kingdom and Northern Ireland (including Gibraltar): CFCs</b>			
All FDEs	8,707	<b>3,740,306,920</b>	<b>1,674,134</b>
United Kingdom and Northern Ireland (including Gibraltar)	2,243	1,512,010,253	19,361,424
Other countries	1,511	1,197,808,411	14,011,130
	732	314,201,842	5,350,294

NOTE: Detail may not add to totals because of rounding.

## Controlled Foreign Corporations, 2008

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**Table 5. Controlled Foreign Corporations and Their Foreign Disregarded Entities: Number, End-of-Year Total Assets, and Current Earnings and Profits (Less Deficit) After Income Taxes, by Selected Industrial Sector, Tax Year 2008**

[All figures are estimates based on a sample—money amounts are in thousands of dollars]

Selected industrial sector of Controlled Foreign Corporation and Foreign Disregarded Entity	Number of foreign entities	End-of-year total assets	Current earnings and profits (less deficit) after taxes
			(1)
<b>All industries: CFCs</b>	<b>83,642</b>	<b>14,544,673,064</b>	<b>536,766,219</b>
All industries: FDEs	17,548	4,945,533,640	230,134,514
Raw materials and energy production	748	175,623,875	27,857,276
Goods production	3,446	617,586,355	45,507,642
Distribution and transportation of goods	3,240	348,236,828	21,185,444
Information	1,120	309,455,982	3,577,603
Finance, insurance, real estate, and rental and leasing	2,835	1,911,476,726	51,325,654
Services	6,016	1,576,896,128	80,102,362
Nature of business not allocable	144	<b>6,257,746</b>	<b>578,534</b>
<b>Raw materials and energy production: CFCs</b>	<b>2,572</b>	<b>459,218,983</b>	<b>55,215,396</b>
All industries: FDEs	638	159,074,441	24,414,174
Raw materials and energy production	504	134,885,683	22,560,088
Goods production	d	d	d
Distribution and transportation of goods	12	2,179,818	154,647
Information	0	0	0
Finance, insurance, real estate, and rental and leasing	42	4,828,392	469,572
Services	70	17,084,860	1,186,887
Nature of business not allocable	d	d	d
<b>Goods production: CFCs</b>	<b>20,625</b>	<b>2,028,750,106</b>	<b>125,756,821</b>
All industries: FDEs	3,519	694,454,341	48,335,528
Raw materials and energy production	34	3,010,872	151,048
Goods production	1,543	263,406,560	23,944,281
Distribution and transportation of goods	726	84,220,391	5,942,589
Information	54	2,688,178	135,932
Finance, insurance, real estate, and rental and leasing	178	106,600,163	4,732,803
Services	953	231,769,785	12,856,318
Nature of business not allocable	31	2,758,394	572,556
<b>Distribution and transportation of goods: CFCs</b>	<b>16,758</b>	<b>883,224,540</b>	<b>58,919,684</b>
All industries: FDEs	2,081	410,168,023	32,672,876
Raw materials and energy production	27	6,243,593	596,131
Goods production	298	129,293,284	9,694,323
Distribution and transportation of goods	1,105	100,877,759	10,771,827
Information	50	1,225,997	1,002,494
Finance, insurance, real estate, and rental and leasing	135	77,688,149	6,136,655
Services	443	94,492,282	4,460,838
Nature of business not allocable	24	346,959	10,609
<b>Information: CFCs</b>	<b>5,066</b>	<b>338,916,808</b>	<b>19,413,078</b>
All industries: FDEs	803	335,842,142	363,930
Raw materials and energy production	0	0	0
Goods production	0	0	0
Distribution and transportation of goods	17	710,521	54,851
Information	517	244,253,033	628,175
Finance, insurance, real estate, and rental and leasing	d	d	d
Services	236	79,061,542	-303,831
Nature of business not allocable	d	d	d
<b>Finance, insurance, real estate, and rental and leasing: CFCs</b>	<b>10,192</b>	<b>6,748,568,576</b>	<b>38,129,902</b>
All industries: FDEs	2,230	1,457,514,029	27,302,360
Raw materials and energy production	22	2,038,015	-27,786
Goods production	38	8,939,293	903,922
Distribution and transportation of goods	63	4,541,045	633,217
Information	d	d	d
Finance, insurance, real estate, and rental and leasing	1,766	1,293,438,443	23,146,942
Services	307	145,853,397	2,511,773
Nature of business not allocable	d	d	d

Footnotes at end of table.

## Controlled Foreign Corporations, 2008

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**Table 5. Controlled Foreign Corporations and Their Foreign Disregarded Entities: Number, End-of-Year Total Assets, and Current Earnings and Profits (Less Deficit) After Income Taxes, by Selected Industrial Sector, Tax Year 2008—Continued**

[All figures are estimates based on a sample—money amounts are in thousands of dollars]

Selected industrial sector of Controlled Foreign Corporation and Foreign Disregarded Entity	Number of foreign entities	End-of-year total assets	Current earnings and profits (less deficit) after taxes
	(1)	(2)	(3)
<b>Services: CFCs</b>	<b>28,357</b>	<b>4,085,945,184</b>	<b>239,334,780</b>
All industries: FDEs	8,266	1,888,324,343	97,037,659
Raw materials and energy production	161	29,445,712	4,577,796
Goods production	1,557	215,814,779	10,920,718
Distribution and transportation of goods	1,316	155,707,293	3,628,313
Information	471	60,120,770	1,667,577
Finance, insurance, real estate, and rental and leasing	690	417,084,862	16,853,029
Services	4,007	1,008,634,262	59,390,377
Nature of business not allocable	64	1,516,665	-152
<b>Nature of business not allocable: CFCs</b>	<b>72</b>	<b>48,868</b>	<b>-3,442</b>
All industries: FDEs	10	156,320	7,987
Raw materials and energy production	d	d	d
Goods production	d	d	d
Distribution and transportation of goods	d	d	d
Information	d	d	d
Finance, insurance, real estate, and rental and leasing	d	d	d
Services	d	d	d
Nature of business not allocable	d	d	d

d—Not shown to avoid disclosure of information on specific corporations. However, the data are included in the appropriate totals.

NOTE: Detail may not add to totals because of rounding.



# Sampling Methodology and Data Limitations

This article discusses typical sampling procedures used in most Statistics of Income (SOI) programs. Aspects covered briefly include sampling criteria, selection techniques, methods of estimation, and sampling variability. Some of the nonsampling error limitations of the data are also described, as well as the tabular conventions employed.

Additional information on sample design and data limitations for specific SOI studies can be found in the separate SOI reports. More technical information is available, on request, by writing to the Director, Statistics of Income Division RASS, Internal Revenue Service, P.O. Box 2608, Washington, DC 20013-2608.

## Sample Criteria and Selection of Returns

Statistics compiled for the SOI studies are generally based on stratified probability samples of income tax returns or other forms filed with the Internal Revenue Service (IRS). The statistics do not reflect any changes made by the taxpayer through an amended return or by the IRS as a result of an audit. As returns are filed and processed for tax purposes, they are assigned to sampling classes (strata) based on such criteria as: industry, presence or absence of a tax form or schedule, and various income factors or other measures of economic size (such as total assets, total receipts, size of gift, and size of estate). The samples are selected from each stratum over the appropriate filing periods. Thus, sample selection can continue for a given study for several calendar years—3 for corporations because of the incidence of fiscal (noncalendar) year reporting and extensions of filing time. Because sampling must take place before the population size is known precisely, the rates of sample selection within each stratum are fixed. This means, in practice, that both the population and the sample size can differ from those planned. However, these factors do not compromise the validity of the estimates.

The probability of a return's selection depends on its sample class or stratum and may range from a fraction of 1 percent to 100 percent. Considerations in determining the selection probability for each stratum include the number of returns in the stratum, the diversity of returns in the stratum, and interest in the stratum as a separate subject of study. All this is subject to constraints based on the estimated processing costs or the target size of the total sample for the program.

For most SOI studies, returns are designated by computer from the IRS Master Files based on the taxpayer identification number (TIN), which is either the Social Security number (SSN) or the Employer Identification Number (EIN). A fixed and essentially random number is associated with each possible TIN. If

that random number falls into a range of numbers specified for a return's sample stratum, then it is selected and processed for the study. Otherwise, it is counted (for estimation purposes), but not selected. In some cases, the TIN is used directly by matching specified digits of it against a predetermined list for the sample stratum. A match is required for designation.

Under either method of selection, the TINs designated from one year's sample are, for the most part, selected for the next year's, so that a very high proportion of the returns selected in the current year's sample are from taxpayers whose previous years' returns were included in earlier samples. This longitudinal character of the sample design improves the estimates of change from one year to the next.

## Method of Estimation

As noted above, the probability with which a return is selected for inclusion in a sample depends on the sampling rate prescribed for the stratum in which it is classified. "Weights" are computed by dividing the count of returns filed for a given stratum by the number of population sample returns for that same stratum. These weights are usually adjusted for unavailable returns and outliers. Weights are used to adjust for the various sampling rates used, relative to the population—the lower the rate, the larger the weight. For some studies, it is possible to improve the estimates by subdividing the original sampling classes into "poststrata," based on additional criteria or refinements of those used in the original stratification. Weights are then computed for these poststrata using additional population counts. The data on each sample return in a stratum are then multiplied by that weight. To produce the tabulated estimates, the weighted data are summed to produce the published statistical totals.

## Sampling Variability

The particular sample used in a study is only one of a large number of possible random samples that could have been selected using the same sample design. Estimates derived from the different samples usually vary. The standard error of the estimate is a measure of the variation among the estimates from all possible samples and is used to measure the precision with which an estimate from a particular sample approximates the average result of the possible samples.

**Sample returns  
are designated  
by computer  
from the IRS  
Master Files based  
on the taxpayer  
identification  
number.**

## Sampling Methodology and Data Limitations

**In transcribing and tabulating data from tax returns, checks are imposed to improve the quality of the statistics.**

The sample estimate and an estimate of its standard error permit the construction of interval estimates with prescribed confidence that this interval includes the actual population value.

In SOI reports, the standard error is not directly presented. Instead, the ratio of the standard error to the estimate itself is presented in percentage form. This ratio is called the coefficient of variation (CV). The user of SOI data may multiply an estimate by its CV to recreate the standard error and to construct confidence intervals.

For example, if a sample estimate of 150,000 returns is known to have a coefficient of variation of 2 percent, then the following arithmetic procedure would be followed to construct a 68-percent confidence interval estimate:

$$\begin{aligned} 150,000 & \text{ (sample estimate)} \\ \times 0.02 & \text{ (coefficient of variation)} \\ = 3,000 & \text{ (standard error of estimate)} \end{aligned}$$

then:

$$\begin{aligned} 150,000 & \text{ (sample estimate)} \\ + \text{ or } - 3,000 & \text{ (standard error)} \\ = \{147,000, 153,000\} & \text{ (68-percent confidence interval).} \end{aligned}$$

Based on these data, the interval estimate is from 147 to 153 thousand returns. This means that the average estimate of the number of returns lies within an interval computed in this way. Such an estimate would be correct for approximately two-thirds of all possible samples similarly selected. To obtain this interval estimate with 95-percent confidence, the standard error should be multiplied by 2 before adding to and subtracting from the sample estimate. (In this particular case, the resulting interval would be from 144 to 156 thousand returns.)

Further details concerning sample design, sample selection, estimation method, and sampling variability for a particular SOI study may be obtained, on request, by writing to the Director, Statistics of Income Division, at the address given above.

### Nonsampling Error Controls and Limitations

Although the previous discussion focuses on sampling methods and the limitations of the data caused by sampling error, there are other sources of error that may be significant in evaluating the usefulness of SOI data. These include taxpayer reporting errors and inconsistencies, processing errors, and the effects of any early cutoff

of sampling. Additional information on nonsampling error as it applies to individual and corporation income tax returns is presented in the separate SOI reports on these returns.

In transcribing and tabulating the information from returns or forms selected for the sample, steps are taken to improve the quality of the resultant estimates. Tax return data may be disaggregated or recombined during the statistical abstracting and "editing" process that takes place in IRS submission processing centers. This is done to improve data consistency from return to return and to achieve definitions of the data items more in keeping with the needs of major users. In some cases, not all of the data are available from the tax return as originally filed. Sometimes, the missing data can be obtained by the Statistics of Income Division in Washington, DC, through field followup. More often, though, they are obtained through manual or computerized imputation. For this purpose, other information in the return or in accompanying schedules may be sufficient to serve as the basis for making an estimate. Prior-year data for the same taxpayer can be used for this same purpose, or comparable data from business reference books may be substituted.

Data abstracted or "edited" from returns for statistical use are subjected to a number of validation checks, including systematic verifications of a sampling of the work of each tax examiner involved in the SOI process. Data reported on sampled returns and previously transcribed as part of processing for the IRS Master Files are subject to validation as part of the administrative process before SOI processing begins. However, during the administrative process, it is only practical to transcribe corrections to errors that have a direct bearing on the tax reported or the refund claimed. Therefore, during the SOI process, checks must also be made to correct any errors or inconsistencies left in the administrative data before the data can be accepted for the statistics.

The Statistics of Income program includes many more tax return items than are transcribed and perfected for IRS tax administration needs, especially for items reported in tax return schedules in support of the various summary totals reported on the return. Therefore, checks must also be designed to validate these additional data items and to assure that they are consistent with other data entries.

Most of the data validation checks made during the SOI process take the form of computerized tests of each record. In addition to verifying that internal consistency and proper balance and relationships among the tax return items and statistical classifications are maintained, this process is intended to check on consistency with tax law provisions, acceptable reporting practices, and

## Sampling Methodology and Data Limitations

generally accepted accounting principles. Most testing occurs during the data abstracting and editing operation, while the tax return source document is still on hand, although some testing for certain programs occurs later on. Records failing the tests are subjected to further review and correction.

Finally, before publication, the statistics are reviewed for accuracy and reasonableness in light of the tax law provisions, taxpayer reporting variations and other limitations, tolerances and statistical techniques allowed or employed in data processing and estimating, economic conditions, and comparability with other statistical series. However, these controls do not completely eliminate the possibility of error. When discovered, errors in *Bulletin* tables are corrected, through a published errata.

### Table Conventions

Published estimates subject to excessive sampling variability are identified for most of the statistics by means of an asterisk (\*) presented alongside the estimate or in place of an estimate. Presence of an asterisk means that the sampling rate was less than 100 percent of the population and that there were fewer than 10 sample observations available for estimation purposes. This method produces a rough indication of excessive sampling variability. However, the results will differ somewhat from more precise indicators of excessive sampling variability based on the standard statistical formula. For some of

the statistics based on samples, asterisking was not possible because of resource and other constraints. Users should keep this limitation in mind when using these data.

A zero, in place of a frequency or an amount, in any given table cell presenting data based on an SOI sample, indicates either that (1) there were no returns in the population with the particular characteristic, or (2) because of its rarity, instances of the characteristic were not present among the sampled returns. However, for statistics based on returns selected for the sample at the 100-percent rate, a zero indicates a presumption of no returns with the particular characteristic in the population.

In addition to sampling variability, Statistics of Income is required to prevent disclosure of information about specific taxpayers or businesses in its tables. Therefore, a weighted frequency (and the associated amount, where applicable) of less than 3 is either combined with data in an adjacent cell(s) so as to meet the criteria, or deleted altogether. Similar steps are taken to prevent indirect disclosure through subtraction. However, any combined or deleted data are included in the appropriate totals. Most data on tax-exempt, nonprofit organizations are excluded from disclosure review because the Internal Revenue Code and regulations permit public access to most of the information reported by these organizations.

# SOI Projects, Contacts, and Public Release Information

General Statistical Information: (202) 874-0410 Fax: (202) 874-0964 e-mail: sis@irs.gov

Project name and contact	Program content and frequency	Program year	End of tax year	Close of Filing Period	Close of filing period (with extensions)	Close of sampling period	Date of public release
<b>Bonds, Tax Exempt:</b> Aaron Barnes	This annual study provides information on private activity and Governmental bond issues by type of property financed, size of face amount, and State.	2011	N/A	N/A	N/A	December 2012	July 2013
<b>Corporations, Complete Report Tabulations:</b> Bill Rush	This annual report provides comprehensive data on corporation income tax returns classified by industry, size of total assets, and size of business receipts.	2010	June 2011	September 2011	March 2012	June 2012	April 2013
<b>Corporations, Foreign Tax Credit:</b> Scott Luttrell Lissa Costa Nuria McGrath	This annual study provides data on foreign income, taxes paid, and foreign tax credit reported on corporation foreign income tax returns. Data are classified by industry group and country.	2010	June 2011	September 2011	March 2012	June 2012	August 2013
<b>Corporations, Interest-Charge Domestic International Sales:</b> Dan Holik	These corporations replaced the Domestic International Sales Corporations, or DISCs, as of 1985. Balance sheet, income statement, and export-related data are tabulated every 2 years.	2010	June 2011	September 2011	March 2012	June 2012	June 2013
<b>Corporations, Source Book:</b> Bill Rush	This annual publication presents detailed income statement, balance sheet, tax, and selected items, by sector, major and minor industrial groups and size of total assets for all returns and separately for returns with net income.	2011	June 2012	September 2012	March 2013	June 2013	December 2013
<b>Corporations, U.S. Controlled Foreign:</b> Jason Wenrich	This semiannual study provides data on activities of foreign corporations that are controlled by U.S. corporations. Data are classified by industry group and country.	2010	June 2011	September 2011	March 2012	June 2012	December 2013
<b>Estate Tax:</b> Brian Raub Joseph Newcomb	This annual study provides information on a gross estate and its composition, deductions, and tax and information on the age, sex, and marital status of decedents. Basic estate tax return data, by year in which returns are filed, are produced each year. Other statistics are available on a year-of-death basis (approximately every 3 years).	2011	N/A	N/A	N/A	December 2011	October 2012
<b>Estate Tax, Nonresident Alien:</b> Melissa Belvedere	This annual study provides information on gross estates, including composition, deductions, and tax, of nonresident aliens who owned at least \$60,000 worth of property within the U.S. at time of death.	2012	N/A	N/A	N/A	December 2012	August 2013

## SOI Projects, Contacts, and Public Release Information

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Project name and contact	Program content and frequency	Program year	End of tax year	Close of Filing Period	Close of filing period (with extensions)	Close of sampling period	Date of public release
<b>Gift Tax:</b> Melissa Belvedere	This annual study provides data for type and amount of gift, information on donee, and tax computation items. Information about the donor and gift splitting is also available.	2011	N/A	N/A	N/A	December 2011	October 2012
<b>Individuals, Advance Data:</b> Scott Hollenbeck Maureen Keenan Kahr Michael Parisi Karen Turnbull-Saunders	This annual study provides information on income, deductions, taxes, and credits reported on individual income tax returns and associated schedules. The file contains information on returns filed through Cycle 38 weighted up to represent a full year of data.	2011	December 2011	April 2012	October 2012	September 2012	February 2013
<b>Individuals, Complete Report File:</b> Scott Hollenbeck Maureen Keenan Kahr Michael Parisi Karen Turnbull-Saunders	This annual study provides information on income, deductions, taxes, and credits reported on individual income tax returns and associated schedules.	2011	December 2011	April 2012	October 2012	December 2012	August 2013
<b>Individuals, Complete Report Tabulations:</b> Michael Parisi Justin Bryan	Basic data are produced annually and cover income, deductions, tax, and credits reported on individual income tax returns and associated schedules. Data are classified by size of adjusted gross income, marital status, age, or type of tax computation.	2011	December 2011	April 2012	October 2012	December 2012	August 2013
<b>Individuals, County Income:</b> Kevin Pierce	County or State income data are available annually.	2010	December 2010	April 2011	October 2011	December 2011	September 2012
<b>Individuals, Foreign Person's Real Property Tax:</b> Scott Luttrell	This annual study provides data on distributions of U.S. real property interests by foreign persons.	2010	December 2010	April 2011	October 2011	September 2012	June 2013
<b>Individuals, Income Tax Percentile Tabulations:</b> Michael Parisi Tony Hall	This annual study provides data on income and tax distribution for all non dependent individual income tax returns by percentiles.	2010	December 2010	April 2011	October 2011	December 2011	October 2012
<b>Individuals, Mid-July Filing Season Statistics:</b> Barry Johnson	Number of returns, total income, total tax and share of income composed of capital gains, by AGI category, reported through week 30 of the processing season.	2013	December 2013	N/A	N/A	N/A	August 2013

## SOI Projects, Contacts, and Public Release Information

**General Statistical Information: (202) 874-0410 Fax: (202) 874-0964 e-mail: sis@irs.gov**

Project name and contact	Program content and frequency	Program year	End of tax year	Close of Filing Period	Close of filing period (with extensions)	Close of sampling period	Date of public release
<b>Individuals, Mid-November Filing Season Statistics:</b> Barry Johnson	Number of returns, total income, total tax and share of income composed of capital gains, by AGI category, reported through week 47 of the processing season.	2013	December 2013	April 2013	October 2013	N/A	December 2013
<b>Individuals, Noncash Charitable Contributions:</b> Janette Wilson; P.J. Liddell; Young Lim	This study of individual income tax returns provides detailed asset donations, descriptions of the donees, donor cost, fair market value, and deduction claimed on Form 8283, Noncash Charitable Contributions.	2010	December 2010	April 2011	October 2011	December 2011	May 2013
<b>Individuals, Nonfarm Sole Proprietorships:</b> Jeff Curry Adrian Dungan	Basic data, produced annually, cover business receipts, deductions, and net income reported on Schedule C, Profit or Loss From Business, for nonfarm proprietors, classified by industry group.	2011	December 2011	April 2012	October 2012	December 2012	August 2013
<b>Individuals, Sales of Capital Assets, Panel:</b> Janette Wilson P.J. Liddell Young Lim	This periodic study provides detailed data on the sales of capital assets reported in the capital gains schedule of the individual income tax return, and on sales of residences and personal or depreciable business property.	1999-2007	December 2010	April 2011	October 2011	December 2011	August 2013
<b>Individuals, Withholding on Foreign Recipients of U.S. Income:</b> Scott Luttrell	This annual study provides data by country on income paid to nonresident aliens and the amount of tax withheld for the U.S. Government.	2010	December 2010	March 2011	April 2011	March 2012	September 2012
<b>International Boycott Report:</b> Lissa Costa	This study provides data on business operations of U.S. "persons" in boycotting countries, as well as the requests and agreements to participate in, or cooperate with, international boycotts not sanctioned by the U.S. Government.	2010	December 2010	April 2011	September 2011	July 2012	October 2012
<b>Partnerships, Income:</b> Nina Shumofsky	Basic data, produced annually, cover income statement, balance sheet, and details from supporting schedules. Data are classified chiefly by industry group.	2011	December 2011	April 2012	September 2012	December 2012	July 2013
<b>Partnerships, Withholding on Foreign Recipients of U.S. Income:</b> Scott Luttrell	This annual study provides data on U.S. partnership payments to foreign partners. Data are classified by country and recipient type.	2010	December 2010	April 2011	October 2011	September 2012	May 2013

## SOI Projects, Contacts, and Public Release Information

**General Statistical Information: (202) 874-0410 Fax: (202) 874-0964 e-mail: sis@irs.gov**

Project name and contact	Program content and frequency	Program year	End of tax year	Close of Filing Period	Close of filing period (with extensions)	Close of sampling period	Date of public release
<b>S Corporations Tabulations:</b> Isaac Goodwin Heather Parisi	Annual study data are collected for the income statement and balance sheet, and from supporting schedules. Data are classified by industry group or asset size.	2011	June 2012	September 2012	March 2013	June 2013	December 2013
<b>Tax-Exempt Organizations (Except Private Foundations)</b> Paul Arnsberger	This annual study provides balance sheet and income statement data for organizations classified as tax-exempt under subsections 501(c) (3)–(9) of the Internal Revenue Code.	2010	November 2011	April 2012	October 2012	December 2012	July 2013
<b>Tax-Exempt Organizations (Private Foundations)</b> Cynthia Belmonte	This annual study provides balance sheet and income statement data for domestic private foundations and charitable trusts filing a Form 990-PF.	2010	November 2011	April 2012	October 2012	December 2012	July 2013
<b>Tax-Exempt Organizations, Unrelated Business Income</b> Jael Jackson	This annual study provides data on unrelated business income and deductions for organizations classified as tax-exempt under the Internal Revenue Code.	2009	November 2010	April 2011	October 2011	December 2011	October 2012
<b>Trusts (and Estates), Income Tax</b> Joseph Newcomb	This annual study provides data on income, deductions, gains, and losses reported by estates and trusts, as well as distributions to beneficiaries and income tax liability.	2011	N/A	N/A	N/A	December 2011	October 2012
<b>Trusts, Foreign</b> Dan Holik	This periodic study, conducted every 4 years, provides data on foreign trusts that have U.S. "persons" as grantors, transferors, or beneficiaries. Data include country where the trust was created, value of transfer to the trust, and year the trust was created.	2010	December 2010	April 2011	October 2011	March 2012	February 2013
<b>Trusts, Split-Interest</b> Lisa Rosenmerkel	This annual study provides information on charitable remainder trusts, charitable lead trusts, and pooled income funds. Data include balance sheet, income, deductions, and detail from accumulation and distribution schedules.	2011	N/A	N/A	N/A	December 2011	October 2012

# SOI Products and Services

Statistics of Income (SOI) data are available in electronic formats and in print. For further information on any of the following products and services, or for answers to questions on the availability of SOI data, other statistical services, or release dates for data, contact SOI's **Statistical Information Services (SIS)**:

**Statistical Information Services (sis@irs.gov)**  
Statistics of Income Division  
Internal Revenue Service  
P.O. Box 2608 • Washington, DC 20013-2608  
(202) 874-0410 • **Fax:** (202) 874-0964

As its name implies, SIS is best able to answer questions about data. It does not supply tax forms or information about the status of an individual's tax refund or audit examination. Media requests should be directed to the IRS Media Relations Branch, Communications Division, on (202) 622-4000.

## Free Products on the Internet

SOI's Internet site offers a combination of files presenting SOI tables, articles about SOI data, and information about SOI products and services, as well as non-SOI products, including Compliance Research projections and nonprofit Master File microdata records. At present, almost 12,000 files reside there.

**Web site:** [www.irs.gov/taxstats](http://www.irs.gov/taxstats)

There is also a direct link to our Web site from FedStats, the gateway to official statistics from the Federal Government: [www.fedstats.gov](http://www.fedstats.gov).

## Tax Stats

On the Tax Stats Home Page, you will find the following list of topics that will lead to a wide range of tables, articles, and data that describe and measure elements of the U.S. tax system. There is also a link to check out What's New.

### Business Tax Statistics

Corporations • International • Partnerships  
Nonfarm Sole Proprietorships  
S Corporations

### Charitable and Exempt Organization Statistics

Charities • Exempt Organization Master File  
Private Foundations • Trusts  
Tax-Exempt Bonds

## Individual Tax Statistics

Individual Income Tax • Estate and Gift Tax  
International • Personal Wealth

## Products, Publications, and Papers

*SOI Bulletins* • IRS Data Books • Data Snapshots  
U.S. Population Migration Data • SOI Paper Series  
Historical Data Tables • Archive

## IRS Operations and Budget

Issuing Refunds • Collecting Revenue  
Enforcing Laws • Assisting Taxpayers

## Statistics by Form

706 • 709 • 990 • 990-PF • 990-T • 1040 • 1041 • 1065  
1118 • 1120 • 5471 • 5472 • 8038

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Dissemination Policy • SOI Products and Services  
SOI Studies • Statistical Methodology

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## Other IRS Data and Research

Taxpayer Compliance Research  
Projections • Filing Season Stats  
IRS Research Conference

## Products for Sale From SOI

Many of SOI's data files are available for sale on CD-ROM or via e-mail through Statistical Information Services. **Prepayment is required for orders of \$100 or more**, with checks made payable to the **IRS Accounting Section**. Credit and debit card payments are also accepted. Contact SIS for information on specific products, prices, sources, media, and ordering instructions.

The following files are currently available on a reimbursable basis and include data from returns for corporations, and individuals.

### Corporation Income Tax Returns

#### Corporation Source Book

CD-ROMs containing data from the Corporation Source Book are available for Tax Years 1996–2003 at a cost of \$250 per year. Data from the 2000 through 2009 Corporation Source Books are available at no charge from the Tax Stats Web site at: [www.irs.gov/uac/SOI-Tax-Stats-Corporation-Source-Book:-U.S.-Total-and-Sectors-Listing](http://www.irs.gov/uac/SOI-Tax-Stats-Corporation-Source-Book:-U.S.-Total-and-Sectors-Listing).

### Individual Income Tax Returns

#### Individual Public-Use Microdata Files

Files for 1992 through 2008 are available on CD-ROM from the SOI Division for \$4,000 per year. These microdata files have been edited to protect the confidentiality of individual taxpayers.

#### County-to-County Migration Data

Data are based on the year-to-year changes in the addresses shown on the population of returns from the IRS Individual Master File system. Data present migration patterns by county for the entire United States, including inflows and outflows, and include the number of returns (which approximates the number of households); the number of personal exemptions (which approximates the population); and total “adjusted gross income.” Available for Filing Years 1991–2010. Price is \$200 per year for the entire United States or \$10 per State per year for Filing Years 1991–2004. All years for the entire United States are also available for \$500. Filing Years 2005–2010 are available at no cost at [www.irs.gov/taxstats](http://www.irs.gov/taxstats). Click on “U.S. Population Migration Data” under Individual Tax Statistics; Individual Income Tax; Data by Geographic Areas.

#### State-to-State Migration Data

Data are based on the year-to-year changes in the addresses shown on the population of returns from the IRS Individual Master File system. Data present migration patterns by State for the entire United States, including inflows and outflows, and include the number of returns (which approximates the number of households); the number of personal exemptions (which approximates the population); and total “adjusted gross income.” Available for Filing Years 1989–2010. Price is \$50 per year for the entire United States or \$10 per State per year for Filing Years 1989–2004. Filing Years 2005–2010 are available at no cost at [www.irs.gov/taxstats](http://www.irs.gov/taxstats).

taxstats. Click on “U.S. Population Migration Data” under Individual Tax Statistics; Individual Income Tax; Data by Geographic Areas.

#### County Income Data

One table, based on the population of returns from the IRS Individual Master File system. This table presents data for adjusted gross income (total and for selected sources), number of returns (which approximates the number of households), and number of personal exemptions (which approximates the population). The data are presented by county (including State totals) and are available for Tax Years 1989–2009 for the entire United States. Price is \$50 per year for the entire United States or \$10 per State per year for Tax Years 1989–2004. Tax Years 2004–2009 are available at no cost at [www.irs.gov/taxstats](http://www.irs.gov/taxstats). Click on “County Income” under Individual Tax Statistics; Individual Income Tax; Data by Geographic Areas.

#### ZIP Code Area Data

Statistics are available for Tax Years 2002 and 2004–2008 on CD-ROM showing the number of individual income tax returns; the total number of exemptions and number of dependent exemptions (which approximates population); adjusted gross income; salaries and wages; taxable interest; total tax; and contributions; by State and 5-digit ZIP Code. In addition to these items, data for Tax Year 2004–2008 also show the amount of taxable dividends; net capital gain/loss; IRA payment adjustment; self-employed pension adjustment; taxes paid deduction; alternative minimum tax; income tax before credits; earned income credit; and number of returns prepared by paid preparers. Price is \$500 for the entire United States; \$25 for a single State. Data for Tax Years 1998, 2001, and 2008 are available at no cost at [www.irs.gov/taxstats](http://www.irs.gov/taxstats). Click on “Zip Code Data (SOI)” under Individual Tax Statistics; Individual Income Tax; Data by Geographic Areas.

#### Tax-Exempt Organizations

#### Compendium of Studies of Tax-Exempt Organizations, 1989–1998

This is a compilation of articles on SOI studies of charitable and other nonprofit organizations described in Internal Revenue Code sections 501(c)(3)–(c)(9), private foundations, charitable remainder trusts, and nonprofit organizations’ unrelated business income. All of these articles were published previously in various issues

## SOI Products and Services

of the Statistics of Income Bulletin. In addition, the Compendium includes papers on statistical sampling of tax-exempt organization returns, and other topics relating to tax-exempt organizations and philanthropy that were authored by IRS staff and others who use SOI study data for research.

### **Microdata Records for Tax Year 2009**

Microdata records of all Forms 990 and 990-EZ sampled for the annual SOI study of tax-exempt organizations. The samples include 17,300 Internal Revenue Code section 501(c)(3) organizations and 6,592 section 501(c)(4)–(9) organizations. All returns for organizations with assets of \$50,000,000 or more are included in the sample. Microdata records contain information on balance sheets and income statements, as well as weights (to estimate the population), for each organization. Available for download from SOI's Tax Stats Web site at [www.irs.gov/uac/SOI-Tax-Stats-Charities-and-Other-Tax-Exempt-Organizations-Statistics](http://www.irs.gov/uac/SOI-Tax-Stats-Charities-and-Other-Tax-Exempt-Organizations-Statistics).

### **Microdata Records for Tax Years 1992–2008**

Microdata records of all Forms 990 and 990-EZ sampled for the annual SOI study of tax-exempt organizations. Microdata records contain information on balance sheets and income statements, as well as weights (to estimate the population), for each organization. Available for download from SOI's Tax Stats Web site at [www.irs.gov/uac/SOI-Tax-Stats-Charities-and-Other-Tax-Exempt-Organizations-Statistics](http://www.irs.gov/uac/SOI-Tax-Stats-Charities-and-Other-Tax-Exempt-Organizations-Statistics).

### **Private Foundations (and Charitable Trusts)**

#### **Microdata Records for Tax Year 2009**

Microdata records of all Forms 990-PF sampled for the annual SOI study covering private foundations and Internal Revenue Code section 4947(a)(1) charitable trusts. The file contains both operating and nonoperating foundations and trusts. The sample includes 16,545 returns. (All returns filed by foundations with assets of \$10 million or more, as well as the population of returns filed by nonexempt charitable trusts, are included in the sample.) Microdata records contain information on revenue, expenses, assets, and distributions, as well as weights, for each foundation or trust. Available for download from SOI's Tax Stats Web site at [www.irs.gov/uac/SOI-Tax-Stats-Domestic-Private-Foundation-and-Charitable-Trust-Statistics](http://www.irs.gov/uac/SOI-Tax-Stats-Domestic-Private-Foundation-and-Charitable-Trust-Statistics).

### **Microdata Records for Tax Years 1992–2008**

Microdata records of all Forms 990-PF sampled for the annual SOI study covering private foundations and Internal Revenue Code section 4947(a)(1) charitable trusts. Microdata records contain information on revenue, expenses, assets, and distributions, as well as weights, for each foundation or trust. Available for download from SOI's Tax Stats Web site at [www.irs.gov/uac/SOI-Tax-Stats-Domestic-Private-Foundation-and-Charitable-Trust-Statistics](http://www.irs.gov/uac/SOI-Tax-Stats-Domestic-Private-Foundation-and-Charitable-Trust-Statistics).

### **Publications**

#### **Statistics of Income—2009, Corporation Source Book**

*Publication 1053, Price: \$175, plus \$10 for shipping and handling*

This document presents detailed income statement, balance sheet, tax, and selected items, by sector, major and minor industrial groups, and size of total assets for all returns and separately for returns with net income. Separate statistics on S corporations are included by sector. Industry detail is based on the North American Industry Classification System (NAICS). The report, which underlies the Statistics of Income—Corporation Income Tax Returns publication, is part of an annual series.

#### **Compendium of Federal Estate Tax and Personal Wealth Studies**

*Publication 1773*

Part I of this report focuses on data from estate tax returns, describing decedents, their beneficiaries, and the composition of their estates. It contains a methodological discussion of the strategy used in weighting sample data for the estate studies and presents statistics on selected components of decedents' estates, 1916–1990. Information on charitable giving is also included.

Part II presents a series of articles describing the estate-multiplier technique and its applications for personal wealth estimates, estimates of personal wealth for selected years 1962–1989, and a discussion of the relationship among realized income, wealth, and well-being.

### Products for Sale From GPO

Recent SOI publications are available from the Superintendent of Documents, U.S. Government Printing Office, Washington, DC, by calling (202) 512-1800, or faxing (202) 512-2250. Credit cards are accepted.

#### Superintendent of Documents

P.O. Box 371954  
Pittsburgh, PA 15250-7954

\* If you determine from the Government Printing Office that any of the following items is out of print, call Statistical Information Services on (202) 874-0410 for assistance.

#### Statistics of Income—2008, Corporation Income Tax Returns

Publication 16 Stock No. 048-004-02532-9  
Price: \$52.00

This report presents comprehensive data on corporation income tax returns with accounting periods that ended July 2008 through June 2009. Data are classified by industry, size of total assets, and size of business receipts.

#### Statistics of Income—2010, Individual Income Tax Returns

Publication 1304, Stock No. 048-004-02552-3  
Price: \$49 Foreign: \$68.60

This report presents more comprehensive and complete data on individual income tax returns for Tax Year 2010 than those published earlier in the *SOI Bulletin*.

Presents information on: Classifies data by:

• sources of income	• size of adjusted gross income
• exemptions	• marital status
• itemized deductions	• type of tax computation
• tax computations	• age

#### IRS Data Book, 2011

Annually, Publication 55B, Stock No. 048-004-02531-1  
Price: \$15.00 International: \$21.00

This volume pertains to Fiscal Year (FY) 2011—October 1, 2010, through September 30, 2011. The report provides information on returns filed and taxes collected, enforcement, taxpayer assistance, the IRS budget and workforce, and other selected activities. The FY 2012 issue of the Data Book will be available in late March 2013.

#### Statistics of Income Bulletin

Quarterly, Publication 1136, Stock No. 748-005-00000-5  
Subscription price: \$67 International: \$93.80

Fall 2012 Single copy, Stock No. 748-005-00113-3  
Single copy price: \$44 International: \$61.60

This series provides the earliest published financial statistics from individual and corporation income tax returns. The *Bulletin* also includes annual data on nonfarm sole proprietorships and partnerships, as well as periodic or special studies of particular interest to tax analysts, administrators, and economists. Historical tables, formerly published in the spring issue, include data from SOI, as well as tax collections and refunds by type of tax.