

# 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)).

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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

### Inside this Issue

2

### *Featured Articles:*

#### **Individual Income Tax Returns, Preliminary Data, 2011**

4

*by Jessica Holland and Michael Parisi*

#### **Individual Income Tax Rates and Shares, 2010**

18

*by Adrian Dungan and Michael Parisi*

#### **Individual Noncash Contributions, 2010**

64

*by Pearson Liddell and Janette Wilson*

#### **Split-Interest Trusts, Filing Year 2011**

92

*by Lisa Schreiber Rosenmerkel*

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

113

*by Cynthia Belmonte*

#### **Controlled Foreign Corporations, 2008**

169

*by Lee Mahony and Randy Miller*

### *Departments:*

#### Sampling Methodology and Data Limitations

235

#### SOI Projects, Contacts, and Public Release Information

238

#### SOI Products and Services

243

#### Index—Previously Published Articles and Data Releases

Inside Back Cover

# 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

**F**or 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

Statistics of Income Bulletin | Winter 2013

**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

Statistics of Income Bulletin | Winter 2013

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

Statistics of Income Bulletin | Winter 2013

**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.

# Individual Income Tax Returns, Preliminary Data, 2011

Statistics of Income Bulletin | Winter 2013

\$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



# Individual Income Tax Returns, Preliminary Data, 2011

Statistics of Income Bulletin | Winter 2013

(\$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*.

## Individual Income Tax Returns, Preliminary Data, 2011

Statistics of Income Bulletin | Winter 2013

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.

# Individual Income Tax Returns, Preliminary Data, 2011

Statistics of Income Bulletin | Winter 2013

**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

Statistics of Income Bulletin | Winter 2013

**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

Statistics of Income Bulletin | Winter 2013

**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                    | 77,475            |
| Amount   | 11,255,268    | 333,427                       | 938,161                 | 2,103,401               | 3,968,140                | 2,873,634                 | 356,357                   | 682,148           |
| Student loan interest deduction:                     |               |                               |                         |                         |                          |                           |                           |                   |
| Number of returns                                    | 10,183,878    | 902,069                       | 1,760,344               | 2,470,851               | 3,588,208                | 1,462,406                 | 0                         | 0                 |
| Amount   | 9,826,305     | 789,818                       | 1,594,673               | 2,537,109               | 3,614,380                | 1,290,326                 | 0                         | 0                 |
| Tuition and fees deduction:                          |               |                               |                         |                         |                          |                           |                           |                   |
| Number of returns                                    | 1,957,339     | 550,123                       | 236,018                 | 179,967                 | 426,043                  | 565,185                   | 0                         | * 4               |
| Amount   | 4,357,612     | 1,600,649                     | 508,996                 | 362,821                 | 828,289                  | 1,056,842                 | 0                         | * 15              |
| Health savings account deduction:                    |               |                               |                         |                         |                          |                           |                           |                   |
| Number of returns                                    | 981,452       | 32,920                        | 78,744                  | 120,400                 | 298,814                  | 254,059                   | 50,931                    | 145,585           |
| Amount   | 2,934,461     | 85,449                        | 137,047                 | 220,089                 | 734,005                  | 878,170                   | 197,837                   | 681,865           |
| Moving expenses adjustment:                          |               |                               |                         |                         |                          |                           |                           |                   |
| Number of returns                                    | 1,024,723     | 103,515                       | 192,313                 | 213,967                 | 308,084                  | 152,096                   | 23,019                    | 31,731            |
| Amount   | 4,170,682     | 1,484,510                     | 417,104                 | 402,498                 | 909,957                  | 608,097                   | 123,492                   | 225,023           |
| Self-employment tax deduction:                       |               |                               |                         |                         |                          |                           |                           |                   |
| 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   | 24,112,872    | 3,258,949                     | 3,007,183               | 2,566,879               | 4,923,208                | 4,727,235                 | 1,122,820                 | 4,506,599         |
| Self-employed health insurance deduction:            |               |                               |                         |                         |                          |                           |                           |                   |
| Number of returns                                    | 3,569,236     | 544,215                       | 427,342                 | 491,573                 | 850,889                  | 680,881                   | 142,113                   | 432,222           |
| Amount   | 22,114,796    | 2,155,927                     | 1,741,713               | 2,336,683               | 4,604,911                | 5,044,595                 | 1,295,901                 | 4,935,066         |
| Payments to a self-employed retirement (Keogh) plan: |               |                               |                         |                         |                          |                           |                           |                   |
| Number of returns                                    | 869,952       | 14,506                        | 27,952                  | 44,198                  | 152,053                  | 259,291                   | 88,888                    | 283,064           |
| Amount   | 17,621,794    | 94,065                        | 147,949                 | 327,755                 | 1,398,135                | 3,786,684                 | 1,949,612                 | 9,917,594         |
| Penalty on early withdrawal of savings:              |               |                               |                         |                         |                          |                           |                           |                   |
| Number of returns                                    | 1,061,787     | 260,054                       | 191,662                 | 170,935                 | 274,449                  | 122,791                   | 16,393                    | 25,502            |
| Amount   | 2,089,469     | 914,639                       | 509,729                 | 512,698                 | 80,833                   | 30,341                    | 5,384                     | 35,845            |
| Alimony paid:  |               |                               |                         |                         |                          |                           |                           |                   |
| Number of returns                                    | 583,132       | 48,281                        | 37,425                  | 73,367                  | 197,085                  | 135,788                   | 23,467                    | 67,720            |
| Amount   | 10,339,024    | 693,100                       | 230,112                 | 563,216                 | 2,148,627                | 2,379,221                 | 691,005                   | 3,633,743         |
| Domestic production activities deduction:            |               |                               |                         |                         |                          |                           |                           |                   |
| Number of returns                                    | 616,344       | 42,571                        | 32,313                  | 55,748                  | 149,208                  | 161,172                   | 33,978                    | 141,355           |
| Amount   | 8,447,895     | 276,637                       | 75,076                  | 130,714                 | 426,013                  | 774,477                   | 233,111                   | 6,531,866         |
| Other adjustments [5]:                               |               |                               |                         |                         |                          |                           |                           |                   |
| Number of returns                                    | 144,280       | 12,232                        | 21,031                  | 29,252                  | 46,107                   | 25,493                    | 4,025                     | 6,140             |
| Amount   | 1,412,611     | 60,533                        | 131,488                 | 137,715                 | 243,270                  | 344,309                   | 73,287                    | 422,010           |
| <b>Total exemptions:</b>                             |               |                               |                         |                         |                          |                           |                           |                   |
| Number of exemptions                                 | 290,959,379   | 49,769,703                    | 60,660,660              | 52,142,563              | 73,010,092               | 41,494,223                | 5,059,100                 | 8,823,038         |
| Amount   | 1,076,128,195 | 184,031,742                   | 224,344,646             | 192,865,474             | 270,068,104              | 153,492,970               | 18,712,390                | 32,612,868        |
| <b>Total deductions:</b>                             |               |                               |                         |                         |                          |                           |                           |                   |
| Number of returns                                    | 143,239,893   | 36,012,957                    | 31,200,606              | 25,523,226              | 30,960,009               | 14,820,595                | 1,732,587                 | 2,989,913         |
| Amount   | 1,940,352,305 | 252,979,729                   | 272,642,268             | 265,265,292             | 469,061,909              | 360,435,016               | 64,672,648                | 255,295,443       |
| Total standard deduction [6]:                        |               |                               |                         |                         |                          |                           |                           |                   |
| Number of returns                                    | 97,014,844    | 34,259,492                    | 27,558,515              | 18,535,395              | 14,051,594               | 2,411,835                 | 94,470                    | 103,544           |
| Amount   | 774,073,808   | 226,653,974                   | 217,675,021             | 157,495,849             | 142,545,232              | 27,485,904                | 1,091,254                 | 1,126,574         |
| Basic standard deduction:                            |               |                               |                         |                         |                          |                           |                           |                   |
| Number of returns                                    | 97,014,844    | 34,259,492                    | 27,558,515              | 18,535,395              | 14,051,594               | 2,411,835                 | 94,470                    | 103,544           |
| 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         |

Footnotes at end of table.



# Individual Income Tax Returns, Preliminary Data, 2011

Statistics of Income Bulletin | Winter 2013

**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

Statistics of Income Bulletin | Winter 2013

**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

Statistics of Income Bulletin | Winter 2013

**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

Statistics of Income Bulletin | Winter 2013

**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                 |
| Self-employment tax:   |               |                               |                         |                         |                          |                           |                           |                   |
| 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

**T**axpayers 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

*Adrian Dungan and Michael Parisi are economists with the Individual Returns Analysis Section. This article was prepared under the direction of Jeff Hartzok, Chief. Technical assistance and review were provided by Michael Strudler, Chief, Individual Returns Research Section.*

<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

Statistics of Income Bulletin | Winter 2013

**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<br>year | Total number<br>of returns                  | Taxable returns      |  |  |                        |   |  |                        |  |                        |
|-------------|---|----------------------|--|--|------------------------|---|--|------------------------|--|------------------------|
|             |   | Number of<br>returns | As a<br>percentage<br>of<br>total returns<br>[1] | Adjusted<br>gross income<br>(less deficit) | Total<br>income<br>tax | Average<br>tax rate<br>(percent)<br>[2],[3] | Average per return (whole dollars) [3]     |                        |  |                        |
|             |   |                      |  |  |                        |   | Current dollars                            |                        | Constant dollars [4]                       |                        |
|             |   |                      |  |  |                        |   | Adjusted<br>gross income<br>(less deficit) | Total<br>income<br>tax | Adjusted<br>gross income<br>(less deficit) | Total<br>income<br>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

# Individual Income Tax Rates and Shares, 2010

Statistics of Income Bulletin | Winter 2013

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   |                                      |                                      |                  |                                    |  |                  |                                      |                  |
|----------|-------------------------------|-------------------|--------------------------------------|--------------------------------------|------------------|------------------------------------|--|------------------|--------------------------------------|------------------|
|          |                               | Number of returns | As a percentage of total returns [1] | Adjusted gross income (less deficit) | Total income tax | Average tax rate (percent) [2],[3] | Average per return (whole dollars) [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

# Individual Income Tax Rates and Shares, 2010

Statistics of Income Bulletin | Winter 2013

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                |
| Average tax rate:                    |           |                               |                    |                         |                         |                         |                          |                           |                           |                             |                     |
| 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.

# Individual Income Tax Rates and Shares, 2010

Statistics of Income Bulletin | Winter 2013

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,<br>item                             | Total     | Size of adjusted gross income |                          |                               |                               |                               |                                |                                 |                                 |                                   |                           |
|---|-----------|-------------------------------|--------------------------|-------------------------------|-------------------------------|-------------------------------|--------------------------------|---------------------------------|---------------------------------|-----------------------------------|---------------------------|
|   |           | Under<br>\$1 [2]              | \$1<br>under<br>\$10,000 | \$10,000<br>under<br>\$20,000 | \$20,000<br>under<br>\$30,000 | \$30,000<br>under<br>\$50,000 | \$50,000<br>under<br>\$100,000 | \$100,000<br>under<br>\$200,000 | \$200,000<br>under<br>\$500,000 | \$500,000<br>under<br>\$1,000,000 | \$1,000,000<br>or<br>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.

# Individual Income Tax Rates and Shares, 2010

Statistics of Income Bulletin | Winter 2013

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.



# Individual Income Tax Rates and Shares, 2010

Statistics of Income Bulletin | Winter 2013

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.

# Individual Income Tax Rates and Shares, 2010

Statistics of Income Bulletin | Winter 2013

**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.

# Individual Income Tax Rates and Shares, 2010

Statistics of Income Bulletin | Winter 2013

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.

# Individual Income Tax Rates and Shares, 2010

Statistics of Income Bulletin | Winter 2013

**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)               |
| <b>Tax Year 2010</b>          |   |                    |  |                      |                         |                   |
| <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         |
| <b>Tax Year 2009</b>          |   |                    |  |                      |                         |                   |
| <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.



# Individual Income Tax Rates and Shares, 2010

Statistics of Income Bulletin | Winter 2013

**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



# Individual Income Tax Rates and Shares, 2010

Statistics of Income Bulletin | Winter 2013

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

# Individual Income Tax Rates and Shares, 2010

Statistics of Income Bulletin | Winter 2013

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.

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?).

# Individual Income Tax Rates and Shares, 2010

Statistics of Income Bulletin | Winter 2013

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



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:

- Disallowed 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.

# Individual Income Tax Rates and Shares, 2010

Statistics of Income Bulletin | Winter 2013

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



# Individual Income Tax Rates and Shares, 2010

Statistics of Income Bulletin | Winter 2013

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.

# Individual Income Tax Rates and Shares, 2010

Statistics of Income Bulletin | Winter 2013

**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

## Individual Income Tax Rates and Shares, 2010

Statistics of Income Bulletin | Winter 2013

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.

# Individual Income Tax Rates and Shares, 2010

Statistics of Income Bulletin | Winter 2013

**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)         | (3)           | (4)                      | (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.

# Individual Income Tax Rates and Shares, 2010

Statistics of Income Bulletin | Winter 2013

**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.

# Individual Income Tax Rates and Shares, 2010

Statistics of Income Bulletin | Winter 2013

**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

Statistics of Income Bulletin | Winter 2013

**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)   |
| All returns                                    |   |                          |                                    |                         |  |
| All tax rates                                  | 448,008,863   | 951,670,957              | 11.8                               | 17.3                    | 4,019,538                                      |
| 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  |
| Joint returns and returns of surviving spouses |   |                          |                                    |                         |  |
| All tax rates                                  | 307,638,825   | 675,632,497              | 12.8                               | 18.1                    | 3,056,170                                      |
| 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  |
| Returns of married persons filing separately   |   |                          |                                    |                         |  |
| All tax rates                                  | 12,882,728  | 20,807,228               | 15.3                               | 19.4                    | 151,727  |
| 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

Statistics of Income Bulletin | Winter 2013

**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)   |
| Returns of heads of households              |   |                          |                                    |                         |  |
| All tax rates                               | 25,261,352  | 37,608,472               | 5.3                                | 11.6                    | 308,681  |
| 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  |
| Returns of single persons                   |   |                          |                                    |                         |  |
| All tax rates                               | 102,225,961   | 217,622,760              | 10.9                               | 16.2                    | 502,959  |
| 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

Statistics of Income Bulletin | Winter 2013

**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<br>adjusted gross income | Number<br>of<br>returns | Taxable<br>income    | Modified<br>taxable<br>income | Tax<br>generated<br>at all rates | Tax generated at specified rate |                           |                            |
|----------------------------------|-------------------------|----------------------|-------------------------------|----------------------------------|---------------------------------|---------------------------|----------------------------|
|                                  |                         |                      |                               |                                  | 0 percent                       | 0 percent (capital gains) |                            |
|                                  |                         |                      |                               |                                  | Number<br>of<br>returns         | Number<br>of<br>returns   | Income<br>taxed<br>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

Statistics of Income Bulletin | Winter 2013

**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<br>adjusted gross income | Tax generated at specified rate |                            |                             |                                 |                            |                             |                         |                            |                             |
|----------------------------------|---------------------------------|----------------------------|-----------------------------|---------------------------------|----------------------------|-----------------------------|-------------------------|----------------------------|-----------------------------|
|                                  | 10 percent                      |                            |                             | 10 percent (from Form 8814) [2] |                            |                             | 15 percent              |                            |                             |
|                                  | Number<br>of<br>returns         | Income<br>taxed<br>at rate | Tax<br>generated<br>at rate | Number<br>of<br>returns         | Income<br>taxed<br>at rate | Tax<br>generated<br>at rate | Number<br>of<br>returns | Income<br>taxed<br>at rate | Tax<br>generated<br>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

Statistics of Income Bulletin | Winter 2013

**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<br>adjusted gross income | Tax generated at specified rate |                            |                             |                         |                            |                             |                            |                            |                             |
|----------------------------------|---------------------------------|----------------------------|-----------------------------|-------------------------|----------------------------|-----------------------------|----------------------------|----------------------------|-----------------------------|
|                                  | 15 percent (capital gains) [3]  |                            |                             | 25 percent              |                            |                             | 25 percent (capital gains) |                            |                             |
|                                  | Number<br>of<br>returns         | Income<br>taxed<br>at rate | Tax<br>generated<br>at rate | Number<br>of<br>returns | Income<br>taxed<br>at rate | Tax<br>generated<br>at rate | Number<br>of<br>returns    | Income<br>taxed<br>at rate | Tax<br>generated<br>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

Statistics of Income Bulletin | Winter 2013

**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<br>adjusted gross income | Tax generated at specified rate |                            |                             |                            |                            |                             |                         |                            |                             |
|----------------------------------|---------------------------------|----------------------------|-----------------------------|----------------------------|----------------------------|-----------------------------|-------------------------|----------------------------|-----------------------------|
|                                  | 28 percent                      |                            |                             | 28 percent (capital gains) |                            |                             | 33 percent              |                            |                             |
|                                  | Number<br>of<br>returns         | Income<br>taxed<br>at rate | Tax<br>generated<br>at rate | Number<br>of<br>returns    | Income<br>taxed<br>at rate | Tax<br>generated<br>at rate | Number<br>of<br>returns | Income<br>taxed<br>at rate | Tax<br>generated<br>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

Statistics of Income Bulletin | Winter 2013

**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<br>adjusted gross income | Tax generated at specified rate |                            |                             |                         |                            |                             |
|----------------------------------|---------------------------------|----------------------------|-----------------------------|-------------------------|----------------------------|-----------------------------|
|                                  | 35 percent                      |                            |                             | Form 8615 [4]           |                            |                             |
|                                  | Number<br>of<br>returns         | Income<br>taxed<br>at rate | Tax<br>generated<br>at rate | Number<br>of<br>returns | Income<br>taxed<br>at rate | Tax<br>generated<br>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

Statistics of Income Bulletin | Winter 2013

**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 |                      |                              | Returns of single persons |                      |                              |
|--------------------------------|--------------------------------|----------------------|------------------------------|---------------------------|----------------------|------------------------------|
|                                | 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

Statistics of Income Bulletin | Winter 2013

**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

Statistics of Income Bulletin | Winter 2013

**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

Statistics of Income Bulletin | Winter 2013

**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

Statistics of Income Bulletin | Winter 2013

**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

Statistics of Income Bulletin | Winter 2013

**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

Statistics of Income Bulletin | Winter 2013

**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 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

Statistics of Income Bulletin | Winter 2013

**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

Statistics of Income Bulletin | Winter 2013

**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)            | (7)            |
| <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

Statistics of Income Bulletin | Winter 2013

**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

Statistics of Income Bulletin | Winter 2013

**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

Statistics of Income Bulletin | Winter 2013

**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

Statistics of Income Bulletin | Winter 2013

**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

Statistics of Income Bulletin | Winter 2013

**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)            | (6)            |
| <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

Statistics of Income Bulletin | Winter 2013

**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

Statistics of Income Bulletin | Winter 2013

**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\*

**F**or Tax Year 2010, 22.5 million individual taxpayers who itemized deductions reported \$44.3 billion in deductions for noncash charitable contributions.<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 |
|---------------------------|-----------------------|---------------------|------------------------------|---------------------------|-----------------------------|-----------------------------------|--|
|                           | (1)                   | (2)                 | (3)                          | (4)                       | (5)                         | (6)                               | (7)  |
| <b>All donations</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>                               |
| 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.

<sup>1</sup> For further details on Tax Year 2010 individual income and tax statistics, see *Statistics of Income—2010, Individual Income Tax Returns* (IRS Publication 1304). Taxpayers who are not required to file Form 8283 do not provide details of their noncash giving. As a result, this article focuses only on the data from Form 8283.

## Individual Noncash Contributions, 2010

Statistics of Income Bulletin | Winter 2013

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.

<sup>2</sup> The deduction amounts reported in this article are the amounts carried to Schedule A for reporting itemized deductions.



## Individual Noncash Contributions, 2010

Statistics of Income Bulletin | Winter 2013

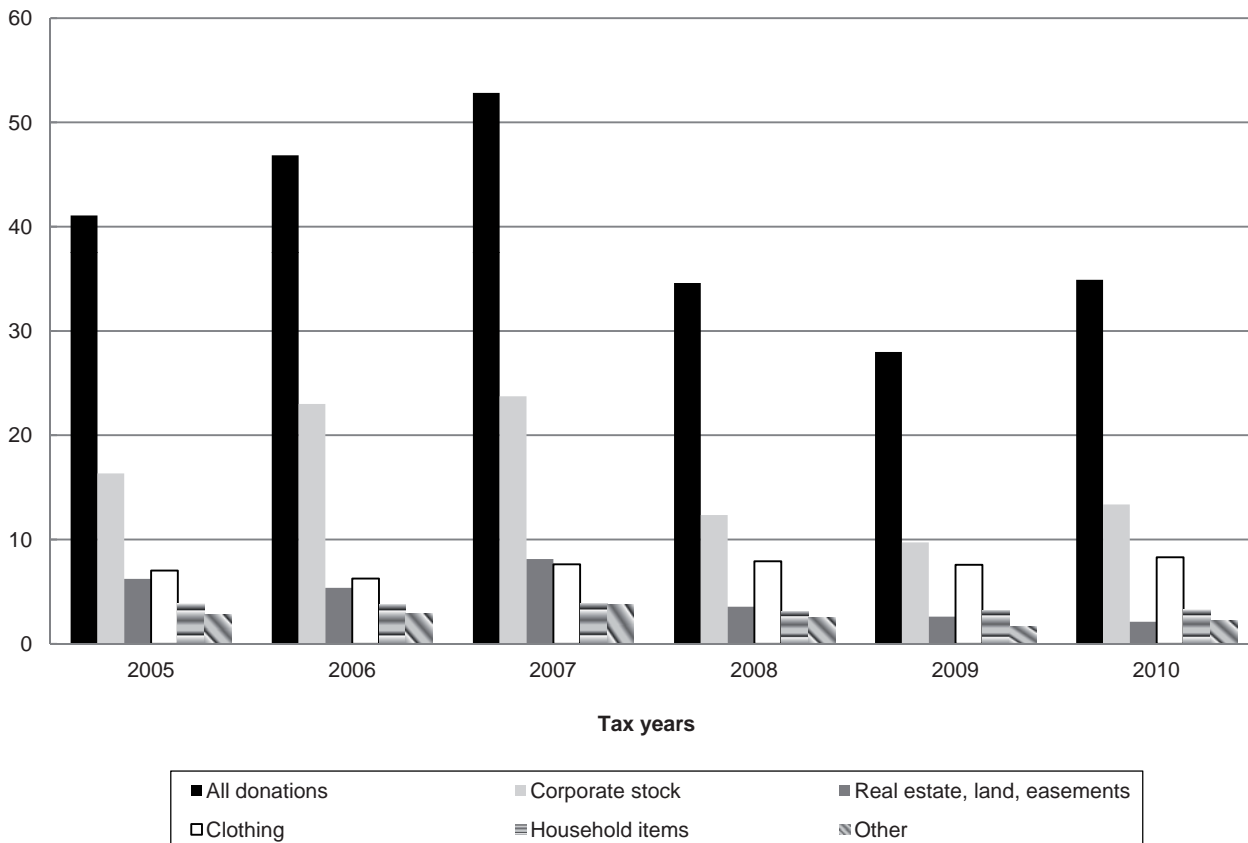
Taxpayer donations of corporate stock, clothing, and household items have consistently represented the highest amounts of all donations claimed. However, while the amount of clothing and household donations has remained fairly consistent since Tax Year 2005, the amounts deducted for corporate stock declined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

Amount of donations  
(billions of dollars)



<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

Statistics of Income Bulletin | Winter 2013

## 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

Statistics of Income Bulletin | Winter 2013

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                         |

## Individual Noncash Contributions, 2010

Statistics of Income Bulletin | Winter 2013

### 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 |
|--|-----------------------|---------------------|------------------------------|---------------------------|-----------------------------|--------------------------------|---|
|  | (1)                   | (2)                 | (3)                          | (4)                       | (5)                         | (6)                            | (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

Statistics of Income Bulletin | Winter 2013

**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.

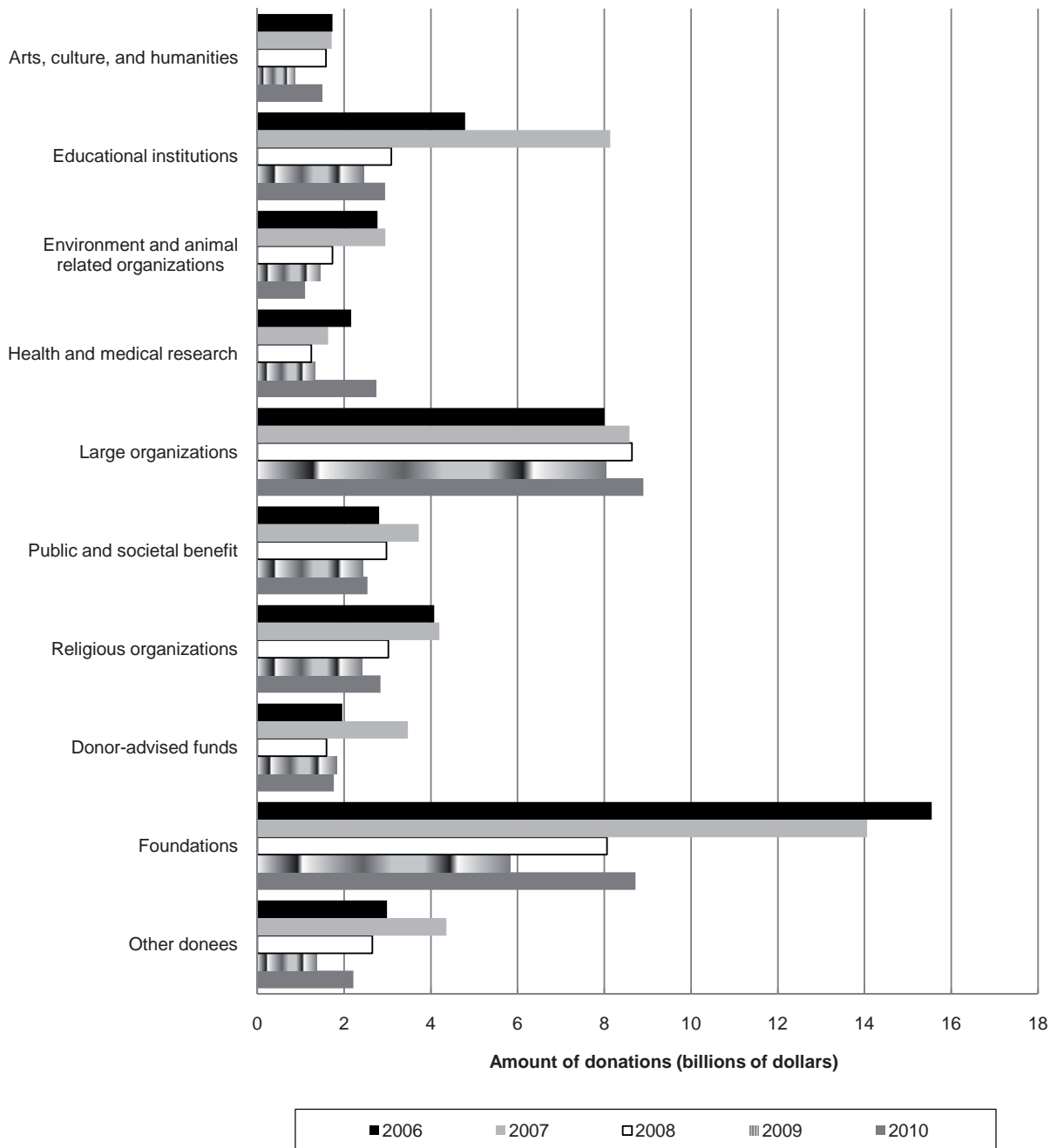
# Individual Noncash Contributions, 2010

Statistics of Income Bulletin | Winter 2013

**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

Statistics of Income Bulletin | Winter 2013

### 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 non-cash 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.

**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.

# Individual Noncash Contributions, 2010

Statistics of Income Bulletin | Winter 2013

*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.

*Façade 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.

## Individual Noncash Contributions, 2010

Statistics of Income Bulletin | Winter 2013

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 |
|-------------------------------------|-------------------|--------------|------------------------------|-------------------|
|                                     | (1)               | (2)          | (3)                          | (4)               |
| <b>All returns</b>                  | <b>0.99</b>       | <b>2.67</b>  | <b>1.34</b>                  | <b>2.57</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).

# Individual Noncash Contributions, 2010

Statistics of Income Bulletin | Winter 2013

**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.

# Individual Noncash Contributions, 2010

Statistics of Income Bulletin | Winter 2013

**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.



# Individual Noncash Contributions, 2010

Statistics of Income Bulletin | Winter 2013

**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] |
|                                     | (1)                            | (2)                 | (3)              | (4)               | (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] |
|                                     | (1)  | (2)                 | (3)               | (4)               | (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.

# Individual Noncash Contributions, 2010

Statistics of Income Bulletin | Winter 2013

**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

Statistics of Income Bulletin | Winter 2013

**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] |
|                                     | (1)   | (2)                 | (3)              | (4)               | (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] |
|                                     | (1)                              | (2)                 | (3)              | (4)               | (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

Statistics of Income Bulletin | Winter 2013

**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)               | (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 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)              | (4)               | (5)                              |
| <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

Statistics of Income Bulletin | Winter 2013

**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

Statistics of Income Bulletin | Winter 2013

**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)              | (4)               | (5)                              |
| <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)               | (4)               | (5)                              |
| <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

Statistics of Income Bulletin | Winter 2013

**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)                         | (2)                 | (3)              | (4)               | (5)                              |
| <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)                     | (2)                 | (3)              | (4)               | (5)                              |
| <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

Statistics of Income Bulletin | Winter 2013

**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)                 | (2)                 | (3)              | (4)               | (5)                              |
| <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)               | (2)                 | (3)              | (4)               | (5)                              |
| <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

Statistics of Income Bulletin | Winter 2013

**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] |
|                                     | (1)                       | (2)                 | (3)              | (4)               | (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

Statistics of Income Bulletin | Winter 2013

**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

Statistics of Income Bulletin | Winter 2013

**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)  |
| <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       | Corporate stock, mutual funds, and other investments |                     |                   |                                  | Real estate and easements                          |                                       |   |  |
|                 | 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>131,882</b>                                       | <b>290,166</b>      | <b>17,769,514</b> | <b>16,944,152</b>                | <b>17,055</b>                                      | <b>17,088</b>                         | <b>5,456,063</b>  | <b>2,110,174</b>                           |
| 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                                  |
| Donor age       | Art and collectibles                                 |                     |                   |                                  | Food   |                                       |   |  |
|                 | 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>84,600</b>  | <b>109,654</b>      | <b>1,275,498</b>  | <b>1,055,346</b>                 | <b>214,827</b>                                     | <b>328,765</b>                        | <b>101,088</b>  | <b>98,722</b>                              |
| 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                                     |
| Donor age       | Clothing and accessories                             |                     |                   |                                  | Electronics  |                                       |   |  |
|                 | 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>5,703,418</b>                                     | <b>12,952,123</b>   | <b>8,326,570</b>  | <b>8,326,579</b>                 | <b>509,750</b>                                     | <b>670,439</b>                        | <b>456,869</b>  | <b>453,226</b>                             |
| 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

Statistics of Income Bulletin | Winter 2013

**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

Statistics of Income Bulletin | Winter 2013

**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

Statistics of Income Bulletin | Winter 2013

**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.

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## Filer Characteristics

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

<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

Statistics of Income Bulletin | Winter 2013

**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

Statistics of Income Bulletin | Winter 2013

**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,<br>type of trustee | All            | Charitable remainder<br>annuity trusts | Charitable remainder<br>unitrusts | Charitable<br>lead trusts | Pooled income<br>funds |
|-------------------------------------|----------------|--|-----------------------------------|---------------------------|------------------------|
|                                     | (1)            | (2)                                    | (3)                               | (4)                       | (5)                    |
| <b>All returns</b>                  | <b>117,704</b> | <b>15,862</b>                          | <b>93,822</b>                     | <b>6,617</b>              | <b>1,402</b>           |
| 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<br>annuity trusts | Charitable remainder<br>unitrusts | Charitable<br>lead trusts | Pooled income<br>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

Statistics of Income Bulletin | Winter 2013

**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

Statistics of Income Bulletin | Winter 2013

**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>    |

| Item  | Charitable lead trusts |                   |                | Pooled income funds |                  |                |
|---|------------------------|-------------------|----------------|---------------------|------------------|----------------|
|   | 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

Statistics of Income Bulletin | Winter 2013

**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.

# Split-Interest Trusts, Filing Year 2011

Statistics of Income Bulletin | Winter 2013

**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)              |
| <b>All CRUTs</b>                        | <b>93,822</b>     | <b>100.0</b>     | <b>67,211</b>                                  | <b>100.0</b>     | <b>23,263</b>               | <b>100.0</b>     | <b>3,349</b>        | <b>100.0</b>     |
| 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 |                  |
|--|---------------------------------|------------------|-------------------------------------|------------------|--------------------------------|------------------|
|  | Number or amount                | Percent of total | Number or amount                    | Percent of total | Number or amount               | Percent of total |
|  | (1)                             | (2)              | (3)                                 | (4)              | (5)                            | (6)              |
| <b>Number of returns</b>                     | <b>109,685</b>                  | <b>N/A</b>       | <b>15,862</b>                       | <b>N/A</b>       | <b>93,822</b>                  | <b>N/A</b>       |
| <b>Total noncharitable distributions [1]</b> | <b>5,198,500</b>                | <b>100.0</b>     | <b>604,291</b>                      | <b>100.0</b>     | <b>4,594,210</b>               | <b>100.0</b>     |
| 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).

# Split-Interest Trusts, Filing Year 2011

Statistics of Income Bulletin | Winter 2013

**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

**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).



# Split-Interest Trusts, Filing Year 2011

Statistics of Income Bulletin | Winter 2013

## 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.

# Split-Interest Trusts, Filing Year 2011

Statistics of Income Bulletin | Winter 2013

**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.

# Split-Interest Trusts, Filing Year 2011

Statistics of Income Bulletin | Winter 2013

**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.

# Split-Interest Trusts, Filing Year 2011

Statistics of Income Bulletin | Winter 2013

**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)                            | (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 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                 |
| <b>Total investments</b>                                 | <b>6,013,071</b> | <b>1,219,836</b>                               | <b>977,313</b>              | <b>1,336,538</b>              | <b>1,205,102</b>               | <b>1,274,283</b>     |
| 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.

# Split-Interest Trusts, Filing Year 2011

Statistics of Income Bulletin | Winter 2013

**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.

# Split-Interest Trusts, Filing Year 2011

Statistics of Income Bulletin | Winter 2013

**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

Statistics of Income Bulletin | Winter 2013

**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.



# Split-Interest Trusts, Filing Year 2011

Statistics of Income Bulletin | Winter 2013

**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.

# Split-Interest Trusts, Filing Year 2011

Statistics of Income Bulletin | Winter 2013

**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>                                       | <b>6,617</b>   | <b>2,864</b>                                   | <b>1,436</b>                | <b>1,306</b>                  | <b>706</b>                     | <b>305</b>           |
| <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

Statistics of Income Bulletin | Winter 2013

**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)                            | (6)                  |
| <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.

# Split-Interest Trusts, Filing Year 2011

Statistics of Income Bulletin | Winter 2013

**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.

# Split-Interest Trusts, Filing Year 2011

Statistics of Income Bulletin | Winter 2013

**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

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>

*Cynthia Belmonte is an economist with the Special Studies Special Projects Section. This article was prepared under the direction of Melissa Ludlum, Chief.*

<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

Statistics of Income Bulletin | Winter 2013

**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

Statistics of Income Bulletin | Winter 2013

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<br>(fair market value) |                        | Total revenue |                        | Disbursements for<br>charitable purposes |                        | Contributions, gifts,<br>and grants paid |                        |
|--------------------------------------|---------------|------------------------|-------------------------------------|------------------------|---------------|------------------------|--|------------------------|--|------------------------|
|                                      | Number        | Percentage<br>of total | Amount                              | Percentage<br>of total | Amount        | Percentage<br>of total | Amount                                   | Percentage<br>of total | Amount                                   | Percentage<br>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.

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

Statistics of Income Bulletin | Winter 2013

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

Statistics of Income Bulletin | Winter 2013

**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.<br>(2) Borrowing money from, lending money to, or otherwise extending credit to a disqualified person.<br>(3) Furnishing goods, services, or facilities to a disqualified person.<br>(4) Paying compensation to, or paying or reimbursing the expenses of, a disqualified person.<br>(5) Transferring any income or assets to a disqualified person.<br>(6) Paying money or property to a Government official.  | 10-percent initial tax per act per year on Self-Dealer.<br><br>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.<br><br>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:<br>(a) Attempting to influence public opinion or any segment of it, and<br>(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.<br>(2) Influencing the outcome of any specific public election, or to conduct, directly or indirectly, any voter registration drive.<br>(3) Providing a grant to an individual for travel, study, or other purposes.<br>(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.<br>(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.<br><br>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

Statistics of Income Bulletin | Winter 2013

**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 | **                | 5      | N/A               | **                     | 13,714     | N/A               | **         | 1,371   | N/A               |
| Section 4945 tax on taxable expenditures     | ** 73             | 98     | N/A               | ** 2,357               | 3,183      | N/A               | ** 405     | 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>  | <b>83,024</b>                | <b>84,660</b>  | <b>2.0</b>        | <b>481,924</b>                   | <b>539,712</b> | <b>12.0</b>       |
| 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>  | <b>523,014</b>               | <b>467,188</b> | <b>-10.7</b>      | <b>22,091</b>                    | <b>16,612</b>  | <b>-24.8</b>      |
| 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

Statistics of Income Bulletin | Winter 2013

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> | <b>2.4</b>                                 | <b>7.4</b> | <b>236.8</b>       | <b>-15.7</b>                                       | <b>-9.7</b> | <b>272.6</b>       |
| Less than \$1,000,000                          | 2.0  | 7.5        | 306.9              | -8.7   | -3.9        | 855.0              |
| \$1,000,000 less than \$10,000,000             | 2.7  | 7.8        | 464.8              | -21.9  | -19.5       | 63.3               |
| \$10,000,000 less than \$50,000,000            | 2.6  | 4.6        | 11.6               | -21.6  | -17.9       | 43.2               |
| \$50,000,000 less than \$100,000,000           | 2.5  | 7.5        | 93.2               | -22.2  | -19.0       | 15.9               |
| \$100,000,000 or more                          | 2.5  | 4.0        | 9.8                | -24.6  | -21.4       | 14.8               |
| <b>Tax Year 2009, Nonoperating foundations</b> | <b>1.9</b>                                 | <b>6.1</b> | <b>129.5</b>       | <b>11.1</b>  | <b>33.9</b> | <b>1,424.6</b>     |
| Less than \$1,000,000                          | 1.5  | 6.5        | 273.9              | 8.5  | 43.4        | 4,286.1            |
| \$1,000,000 less than \$10,000,000             | 2.3  | 5.8        | 189.8              | 13.7   | 14.8        | 85.6               |
| \$10,000,000 less than \$50,000,000            | 2.4  | 4.5        | 32.9               | 13.4   | 15.0        | 37.0               |
| \$50,000,000 less than \$100,000,000           | 2.4  | 3.8        | 6.1                | 13.2   | 14.2        | 17.0               |
| \$100,000,000 or more                          | 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

Statistics of Income Bulletin | Winter 2013

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

Statistics of Income Bulletin | Winter 2013

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

Statistics of Income Bulletin | Winter 2013

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.

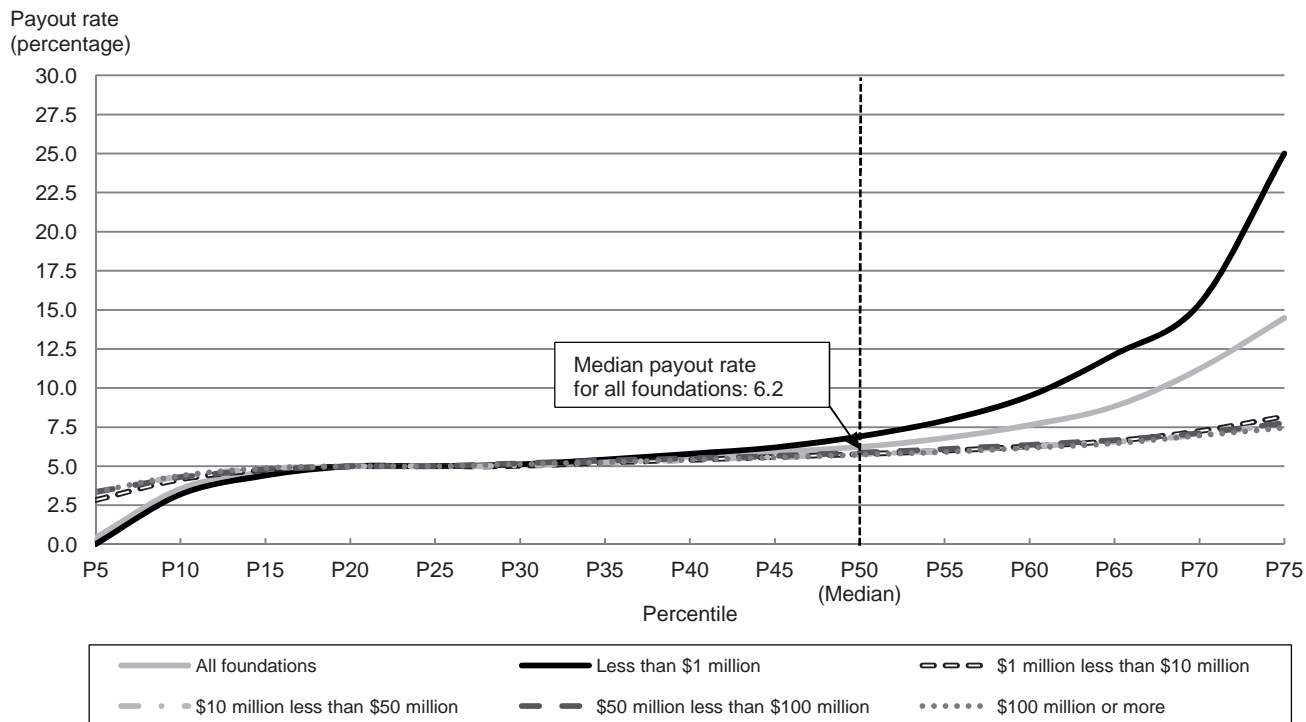
Private foundations report taxable amounts of undistributed income and compute related excise tax liability on Form 4720. This is by far the largest excise tax amount reported by private foundations on Form 4720. The number of foundations that filed Form 4720 for Tax Year 2009 for failing to distribute 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

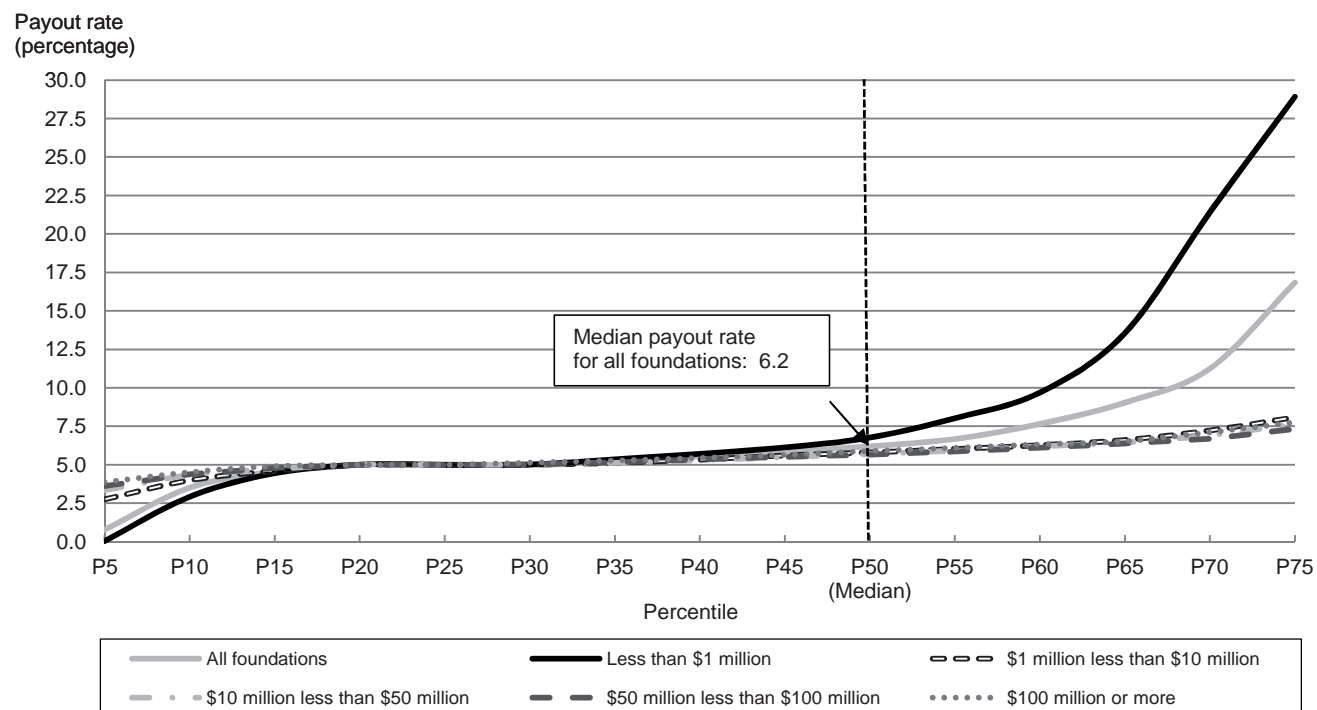
Statistics of Income Bulletin | Winter 2013

**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



## 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



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

Statistics of Income Bulletin | Winter 2013

**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.

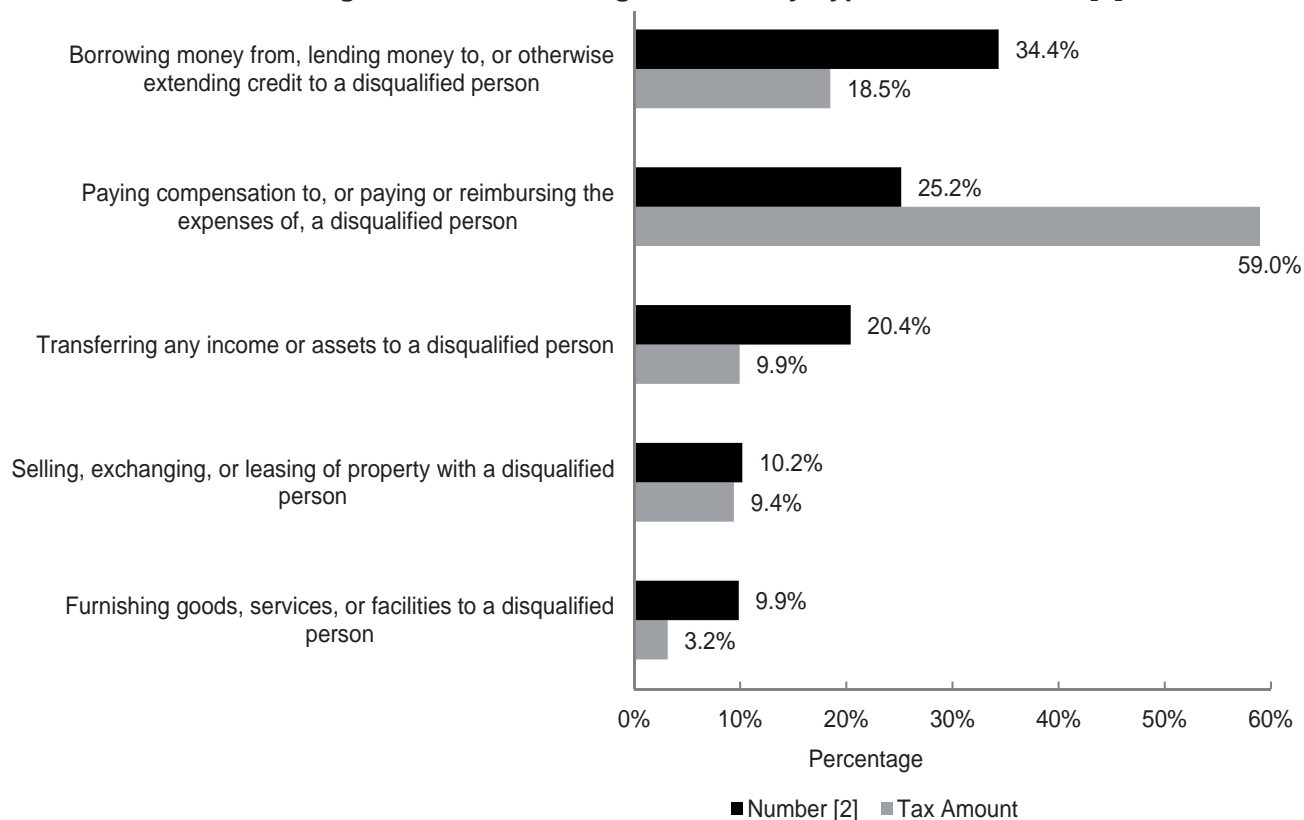
<sup>12</sup> The total self-dealing tax imposed on foundation managers for all years in the taxable period is limited to \$20,000.

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

Statistics of Income Bulletin | Winter 2013

**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

Statistics of Income Bulletin | Winter 2013

**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



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

Statistics of Income Bulletin | Winter 2013

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

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

Statistics of Income Bulletin | Winter 2013

**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



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

Statistics of Income Bulletin | Winter 2013

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).

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

Statistics of Income Bulletin | Winter 2013

*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

Statistics of Income Bulletin | Winter 2013

**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               |                   |  |                  |
|----------------------------------|-------------------|-------------------|-------------------|---|-------------------|--|------------------|
|                                  |                   | Number of returns | Amount            | Contributions, gifts, and grants received |                   | Dividends and interest from securities |                  |
|                                  |                   |                   |                   | 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

Statistics of Income Bulletin | Winter 2013

**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

Statistics of Income Bulletin | Winter 2013

**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)       |
| All foundations                  |   |            |                   |            |   |            |                       |            |
| Total                            | 53,765                                    | -5,556,396 | 90,797            | 56,184,890 | 90,682                                      | -4,005,766 | 71,789                | 17,574,446 |
| 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  |
| Nonoperating foundations         |   |            |                   |            |   |            |                       |            |
| Total                            | 51,750                                    | -5,152,165 | 82,996            | 47,967,472 | 82,928                                      | -3,396,212 | 67,422                | 16,612,123 |
| 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  |
| Operating foundations            |   |            |                   |            |   |            |                       |            |
| Total                            | 2,015                                     | -404,231   | 7,800             | 8,217,418  | 7,754                                       | -609,554   | 4,367                 | 962,323    |
| 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    |
| Grantmaking foundations          |   |            |                   |            |   |            |                       |            |
| Total                            | 50,718                                    | -5,380,910 | 77,213            | 52,946,300 | 76,957                                      | -7,328,469 | 65,088                | 17,202,680 |
| 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

Statistics of Income Bulletin | Winter 2013

**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)       |
| Grantmaking-nonoperating foundations |   |            |                   |            |   |            |                       |            |
| Total                                | 49,409                                    | -5,013,126 | 73,196            | 47,063,715 | 73,044                                      | -6,153,138 | 62,728                | 16,506,201 |
| 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  |
| Grantmaking-operating foundations    |   |            |                   |            |   |            |                       |            |
| Total                                | 1,309                                     | -367,784   | 4,017             | 5,882,585  | 3,913                                       | -1,175,331 | 2,360                 | 696,479    |
| 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

Statistics of Income Bulletin | Winter 2013

**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

Statistics of Income Bulletin | Winter 2013

**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

Statistics of Income Bulletin | Winter 2013

**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<br>(book value) [2] |                    | Investments in securities (book value) |                    |                        |                   |
|----------------------------------|---|--------------------|--|--------------------|------------------------|-------------------|
|                                  |   |                    | Total                                  |                    | Government obligations |                   |
|                                  | Number<br>of returns                        | Amount             | Number<br>of returns                   | Amount             | Number<br>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

Statistics of Income Bulletin | Winter 2013

**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<br>(book value) [2] |                    | Investments in securities (book value) |                    |                        |                   |
|---|---|--------------------|--|--------------------|------------------------|-------------------|
|   |   |                    | Total                                  |                    | Government obligations |                   |
|   | Number<br>of returns                        | Amount             | Number<br>of returns                   | Amount             | Number<br>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

Statistics of Income Bulletin | Winter 2013

**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<br>(fair market value) [2] |                    |
|----------------------------------|--|--------------------|----------------------|-------------------|---|--------------------|
|                                  | Corporate stock                                  |                    | Corporate bonds      |                   | Number<br>of returns                    | Amount             |
|                                  | Number<br>of returns                             | Amount             | Number<br>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

Statistics of Income Bulletin | Winter 2013

**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<br>(fair market value) [2] |                    |
|---|--|--------------------|----------------------|-------------------|---|--------------------|
|   | Corporate stock                                  |                    | Corporate bonds      |                   | Number<br>of returns                    | Amount             |
|   | Number<br>of returns                             | Amount             | Number<br>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

Statistics of Income Bulletin | Winter 2013

**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<br>(fair market value) [2] |                    | Investments in securities (fair market value) |                    |                        |                   |                      |                    |
|----------------------------------|--|--------------------|---|--------------------|------------------------|-------------------|----------------------|--------------------|
|                                  |  |                    | Total   |                    | Government obligations |                   | Corporate stock      |                    |
|                                  | Number<br>of returns                               | Amount             | Number<br>of returns                          | Amount             | Number<br>of returns   | Amount            | Number<br>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

Statistics of Income Bulletin | Winter 2013

**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<br>(fair market value) [2] |                    | Investments in securities (fair market value) |                    |                        |                   |                      |                    |
|---|--|--------------------|---|--------------------|------------------------|-------------------|----------------------|--------------------|
|   |  |                    | Total   |                    | Government obligations |                   | Corporate stock      |                    |
|   | Number<br>of returns                               | Amount             | Number<br>of returns                          | Amount             | Number<br>of returns   | Amount            | Number<br>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

Statistics of Income Bulletin | Winter 2013

**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)       |
| All foundations                  |   |            |                        |             |                          |             |                           |            |
| Total                            | 27,160  | 45,834,888 | 91,535                 | 523,341,455 | 91,615                   | 492,264,460 | 91,055                    | 24,514,730 |
| 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 |
| Nonoperating foundations         |   |            |                        |             |                          |             |                           |            |
| Total                            | 26,403  | 43,964,755 | 83,778                 | 486,689,393 | 83,778                   | 467,187,950 | 83,319                    | 23,262,146 |
| 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 |
| Operating foundations            |   |            |                        |             |                          |             |                           |            |
| Total                            | 756   | 1,870,133  | 7,756                  | 36,652,062  | 7,838                    | 25,076,510  | 7,735                     | 1,252,584  |
| 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    |
| Grantmaking foundations          |   |            |                        |             |                          |             |                           |            |
| Total                            | 26,240  | 44,883,035 | 76,646                 | 506,184,594 | 76,901                   | 481,637,139 | 76,696                    | 24,015,595 |
| 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

Statistics of Income Bulletin | Winter 2013

**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)       |
| Grantmaking-nonoperating foundations |   |            |                        |             |                          |             |                           |            |
| Total                                | 25,777  | 43,488,896 | 72,733                 | 479,558,041 | 72,991                   | 462,334,153 | 72,887                    | 23,050,855 |
| 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 |
| Grantmaking-operating foundations    |   |            |                        |             |                          |             |                           |            |
| Total                                | 463   | 1,394,139  | 3,913                  | 26,626,554  | 3,911                    | 19,302,986  | 3,808                     | 964,740    |
| 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

Statistics of Income Bulletin | Winter 2013

**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

Statistics of Income Bulletin | Winter 2013

**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

Statistics of Income Bulletin | Winter 2013

**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               |                |  |                |
|---------------------------------------|-------------------|-------------------|----------------|---|----------------|--|----------------|
|                                       |                   | Number of returns | Amount         | Contributions, gifts, and grants received |                | Dividends and interest from securities |                |
|                                       |                   |                   |                | 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

Statistics of Income Bulletin | Winter 2013

**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

Statistics of Income Bulletin | Winter 2013

**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)    |
| All charitable trusts          |   |          |                   |         |   |          |                       |         |
| Total                          | 5,449                                     | -219,873 | 6,027             | 555,165 | 6,013                                       | -279,124 | 5,733                 | 266,703 |
| 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 |
| Nonoperating charitable trusts |   |          |                   |         |   |          |                       |         |
| Total                          | 5,430                                     | -219,314 | 5,997             | 552,162 | 5,984                                       | -279,383 | 5,707                 | 266,143 |
| 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 |
| Operating charitable trusts    |   |          |                   |         |   |          |                       |         |
| Total                          | 19  | -558     | 30                | 3,003   | 29  | 259      | 26                    | 560     |
| 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       |
| Grantmaking charitable trusts  |   |          |                   |         |   |          |                       |         |
| Total                          | 5,322                                     | -218,455 | 5,830             | 551,240 | 5,812                                       | -389,403 | 5,581                 | 258,754 |
| 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                   | 123,599 |

Footnotes at end of table.



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

Statistics of Income Bulletin | Winter 2013

**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)    |
| Grantmaking-nonoperating charitable trusts |   |          |                   |         |   |          |                       |         |
| Total                                      | 5,309                                     | -217,808 | 5,806             | 549,519 | 5,790                                       | -389,449 | 5,561                 | 258,358 |
| 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 |
| Grantmaking-operating charitable trusts    |   |          |                   |         |   |          |                       |         |
| Total                                      | 13  | -647     | 24                | 1,721   | 22  | 46       | 20                    | 396     |
| 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

Statistics of Income Bulletin | Winter 2013

**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

Statistics of Income Bulletin | Winter 2013

**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

Statistics of Income Bulletin | Winter 2013

**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<br>(book value) |                  | Investments in securities (book value) |                  |                        |                |
|---------------------------------------|---|------------------|--|------------------|------------------------|----------------|
|                                       |   |                  | Total                                  |                  | Government obligations |                |
|                                       | Number<br>of returns                    | Amount           | Number<br>of returns                   | Amount           | Number<br>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

Statistics of Income Bulletin | Winter 2013

**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<br>(book value) |                  | Investments in securities (book value) |                  |                        |                |
|---|---|------------------|--|------------------|------------------------|----------------|
|   |   |                  | Total                                  |                  | Government obligations |                |
|   | Number<br>of returns                    | Amount           | Number<br>of returns                   | Amount           | Number<br>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

Statistics of Income Bulletin | Winter 2013

**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<br>(fair market value) |                  |
|---------------------------------------|--|------------------|----------------------|------------------|-------------------------------------|------------------|
|                                       | Corporate stock                                  |                  | Corporate bonds      |                  | Number<br>of returns                | Amount           |
|                                       | Number<br>of returns                             | Amount           | Number<br>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

Statistics of Income Bulletin | Winter 2013

**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<br>(fair market value) |                  |
|---|--|------------------|----------------------|------------------|-------------------------------------|------------------|
|   | Corporate stock                                  |                  | Corporate bonds      |                  |                                     |                  |
|   | Number<br>of returns                             | Amount           | Number<br>of returns | Amount           | Number<br>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

Statistics of Income Bulletin | Winter 2013

**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<br>(fair market value) |                  | Investments in securities (fair market value) |                  |                        |                |                      |                  |
|---------------------------------------|--|------------------|---|------------------|------------------------|----------------|----------------------|------------------|
|                                       |  |                  | Total   |                  | Government obligations |                | Corporate stock      |                  |
|                                       | Number<br>of returns                           | Amount           | Number<br>of returns                          | Amount           | Number<br>of returns   | Amount         | Number<br>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

Statistics of Income Bulletin | Winter 2013

**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<br>(fair market value) |                  | Investments in securities (fair market value) |                  |                        |                |                      |                  |
|---|--|------------------|---|------------------|------------------------|----------------|----------------------|------------------|
|   |  |                  | Total   |                  | Government obligations |                | Corporate stock      |                  |
|   | Number<br>of returns                           | Amount           | Number<br>of returns                          | Amount           | Number<br>of returns   | Amount         | Number<br>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

Statistics of Income Bulletin | Winter 2013

**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)    |
| All charitable trusts          |   |           |                        |           |                          |           |                           |         |
| Total                          | 3,266   | 1,207,837 | 5,940                  | 7,622,436 | 6,023                    | 7,717,886 | 6,018                     | 382,079 |
| 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 |
| Nonoperating charitable trusts |   |           |                        |           |                          |           |                           |         |
| Total                          | 3,257   | 1,206,459 | 5,909                  | 7,598,928 | 5,993                    | 7,684,001 | 5,988                     | 380,385 |
| 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 |
| Operating charitable trusts    |   |           |                        |           |                          |           |                           |         |
| Total                          | 9   | 1,378     | 31                     | 23,507    | 30                       | 33,885    | 30                        | 1,694   |
| 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     |
| Grantmaking charitable trusts  |   |           |                        |           |                          |           |                           |         |
| Total                          | 3,194   | 1,187,360 | 5,731                  | 7,402,477 | 5,815                    | 7,424,185 | 5,813                     | 369,404 |
| 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                       | 143,400 |

Footnotes at end of table.

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

Statistics of Income Bulletin | Winter 2013

**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

Statistics of Income Bulletin | Winter 2013

**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

Statistics of Income Bulletin | Winter 2013

**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

Statistics of Income Bulletin | Winter 2013

**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

Statistics of Income Bulletin | Winter 2013

**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

Statistics of Income Bulletin | Winter 2013

**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<br>under<br>\$25,000,000 | \$25,000,000<br>under<br>\$50,000,000 | \$50,000,000<br>under<br>\$100,000,000 | \$100,000,000<br>or<br>more |
|  | (6)                                   | (7)                                   | (8)                                    | (9)                         |
| <b>Number of returns</b>   | <b>3,429</b>                          | <b>1,347</b>                          | <b>740</b>                             | <b>705</b>                  |
| <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<br>(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

Statistics of Income Bulletin | Winter 2013

**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<br>under<br>\$25,000,000 | \$25,000,000<br>under<br>\$50,000,000 | \$50,000,000<br>under<br>\$100,000,000 | \$100,000,000<br>or<br>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<br>(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>296,778,488</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<br>(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

Statistics of Income Bulletin | Winter 2013

**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)                            | (7)                  |
| <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

Statistics of Income Bulletin | Winter 2013

**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

**F**or 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

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

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<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.

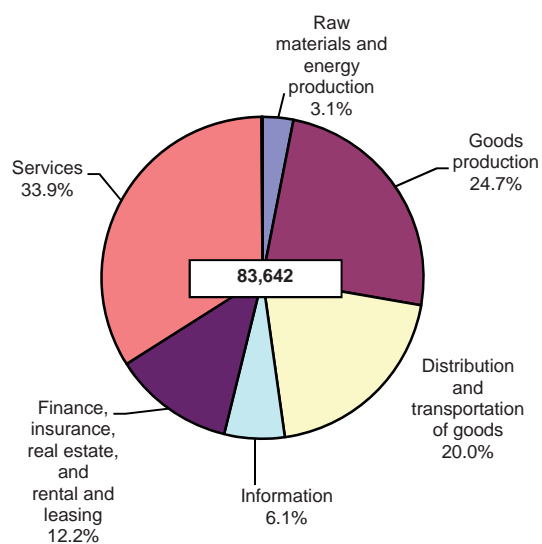
# Controlled Foreign Corporations, 2008

Statistics of Income Bulletin | Winter 2013

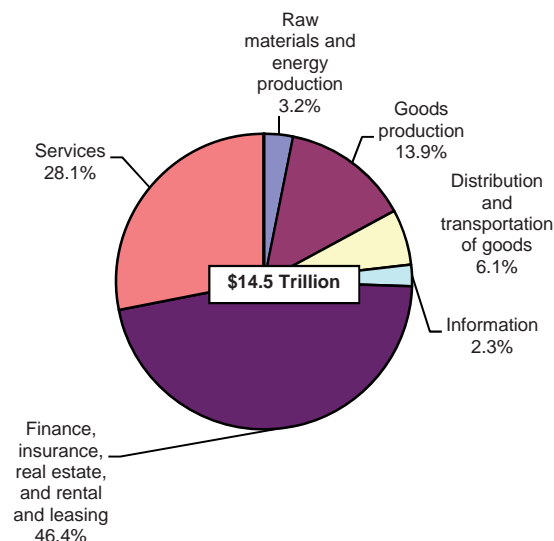
**Figure A**

## 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

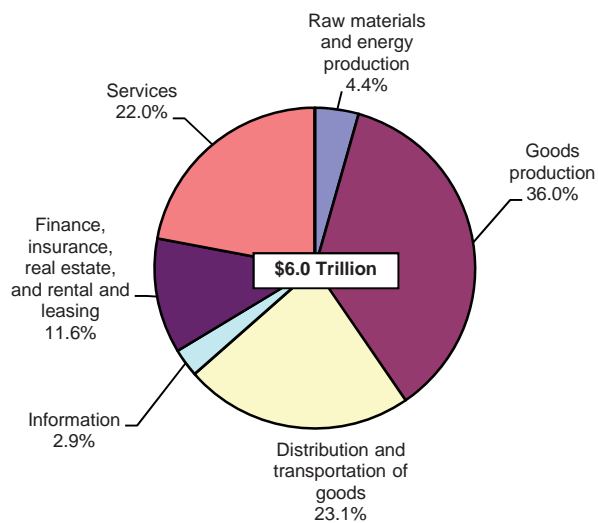
**Number of Foreign Corporations [1]**



**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.



## Controlled Foreign Corporations, 2008

Statistics of Income Bulletin | Winter 2013

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

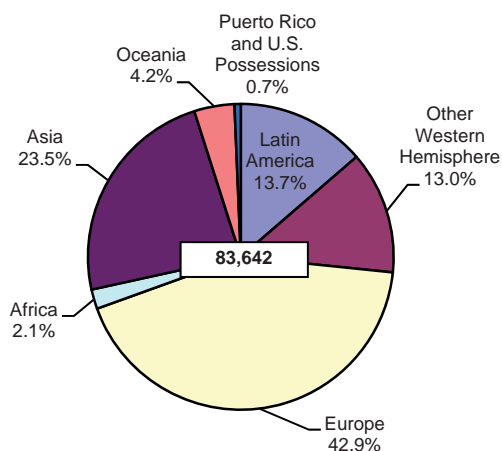
# Controlled Foreign Corporations, 2008

Statistics of Income Bulletin | Winter 2013

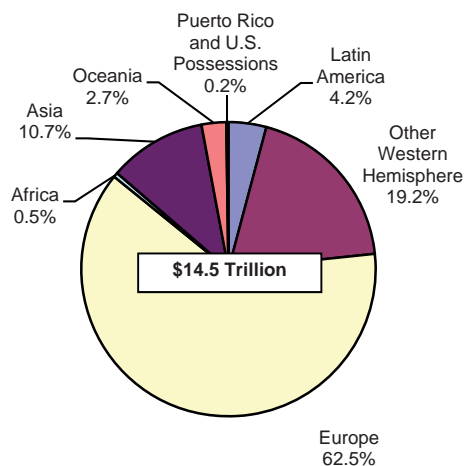
**Figure B**

**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**

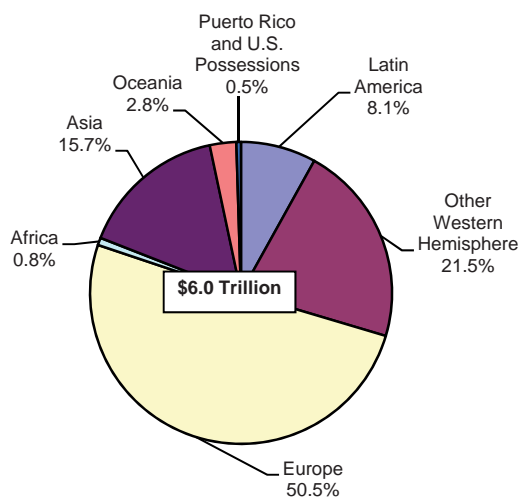
**Number of Foreign Corporations**



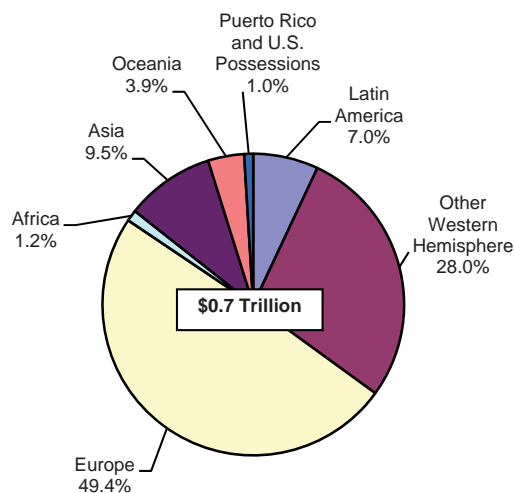
**End-of-Year Total Assets**



**Total Receipts**



**Earnings and Profits [1]**



[1] Less deficits and before income taxes.

NOTE: Detail may not add to 100 percent because of rounding.

## Controlled Foreign Corporations, 2008

Statistics of Income Bulletin | Winter 2013

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.

# Controlled Foreign Corporations, 2008

Statistics of Income Bulletin | Winter 2013

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.



# Controlled Foreign Corporations, 2008

Statistics of Income Bulletin | Winter 2013

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"<br>Foreign Disregarded Entity | Number of Foreign<br>Disregarded Entities | End-of-year<br>total assets | Current earnings and profits<br>(less deficit) after income<br>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.

## Controlled Foreign Corporations, 2008

Statistics of Income Bulletin | Winter 2013

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  |
| Netherlands 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.

## Controlled Foreign Corporations, 2008

Statistics of Income Bulletin | Winter 2013

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).

# Controlled Foreign Corporations, 2008

Statistics of Income Bulletin | Winter 2013

**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

Statistics of Income Bulletin | Winter 2013

**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)   |
| 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 suppliers 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

Statistics of Income Bulletin | Winter 2013

**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

Statistics of Income Bulletin | Winter 2013

**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<br>of Controlled Foreign Corporation | Controlled Foreign Corporations |  |   |                    |  |   |
|--|---------------------------------|--|---|--------------------|--|---|
|  | Income<br>taxes                 | Current<br>earnings and<br>profits (less<br>deficit) after<br>income taxes | Foreign corporations with current earnings and<br>profits (+) before income taxes |                    |  | Distributions<br>out of earnings<br>and profits |
|  |                                 |  | Current<br>earnings and<br>profits before<br>income taxes                         | Income<br>taxes    | Current<br>earnings and<br>profits after<br>income taxes | Total   |
|  | (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 extractor   | 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<br>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<br>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<br>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<br>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

Statistics of Income Bulletin | Winter 2013

**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<br>of Controlled Foreign Corporation | Controlled Foreign Corporations |  |   |                   |  |   |
|--|---------------------------------|--|---|-------------------|--|---|
|  | Income<br>taxes                 | Current<br>earnings and<br>profits (less<br>deficit) after<br>income taxes | Foreign corporations with current earnings and<br>profits (+) before income taxes |                   |  | Distributions<br>out of earnings<br>and profits |
|  |                                 |  | Current<br>earnings and<br>profits before<br>income taxes                         | Income<br>taxes   | Current<br>earnings and<br>profits after<br>income taxes | Total   |
|  | (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<br>merchant wholesalers               | 430,167                         | -310,476   | 1,298,091   | 375,101           | 922,990  | 278,813   |
| Professional and commercial equipment and<br>supplies merchant wholesalers               | 268,146                         | 1,775,762  | 2,135,872   | 267,712           | 1,868,160  | 265,595   |
| Electrical and electronic goods merchant<br>wholesalers                                  | 812,091                         | 2,496,881  | 4,053,752   | 756,066           | 3,297,687  | 1,202,861                                       |
| Machinery, equipment, and suppliers merchant<br>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<br>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<br>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<br>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

Statistics of Income Bulletin | Winter 2013

**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 | Total                                     |
|   | (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

Statistics of Income Bulletin | Winter 2013

**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

Statistics of Income Bulletin | Winter 2013

**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 suppliers 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

Statistics of Income Bulletin | Winter 2013

**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>                          | <b>30,055,487</b>                                   | <b>21,031,506</b>                     | <b>8,086,882</b>                               | <b>26,965,313</b>      | <b>694,703,129</b>                    | <b>148,047,881</b>         |
| 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

Statistics of Income Bulletin | Winter 2013

**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<br>of Controlled Foreign Corporation | Controlled Foreign Corporations                 |   |  |                                 |                      |   |
|--|---|---|--|---------------------------------|----------------------|---|
|  | Receipts by foreign corporations from—continued |   |  |                                 |                      | Payments by<br>foreign<br>corporations to |
|  | U.S.<br>corporation<br>filing return            | Domestic<br>corporations<br>controlled by<br>U.S.<br>corporation<br>filing return | Any foreign<br>corporations<br>controlled by<br>U.S.<br>corporation<br>filing return | All other<br>related<br>parties | Unrelated<br>parties |   |
|  |   |   |  |                                 |                      | All recipients                            |
|  | (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<br>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<br>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<br>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<br>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.



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Statistics of Income Bulletin | Winter 2013

**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<br>of Controlled Foreign Corporation | Controlled Foreign Corporations                 |   |  |                                 |                      |   |
|--|---|---|--|---------------------------------|----------------------|---|
|  | Receipts by foreign corporations from—continued |   |  |                                 |                      | Payments by<br>foreign<br>corporations to |
|  | U.S.<br>corporation<br>filing return            | Domestic<br>corporations<br>controlled by<br>U.S.<br>corporation<br>filing return | Any foreign<br>corporations<br>controlled by<br>U.S.<br>corporation<br>filing return | All other<br>related<br>parties | Unrelated<br>parties | All recipients                            |
|  |   |   |  |                                 |                      |   |
|  | (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<br>merchant wholesalers               | 370,363   | 120,884   | 2,292,125  | 0                               | 37,187,265           | 39,412,805                                |
| Professional and commercial equipment and<br>supplies merchant wholesalers               | 1,592,765                                       | 355,340   | 3,878,172  | * 163                           | 13,143,774           | 17,196,713                                |
| Electrical and electronic goods merchant<br>wholesalers                                  | 4,637,080                                       | 824,976   | 12,016,032   | 2,391                           | 79,480,387           | 95,058,378                                |
| Machinery, equipment, and suppliers merchant<br>wholesalers                              | 3,471,530                                       | 1,489,128   | 9,837,049  | * 3,177                         | 67,257,029           | 78,950,662                                |
| Drugs and druggists' sundries merchant<br>wholesalers                                    | 13,304,563                                      | 5,513,984   | 48,771,885   | * 33,401                        | 68,124,954           | 134,053,657                               |
| Apparel, piece goods, and notions merchant<br>wholesalers                                | 201,369   | 813,901   | 2,164,754  | 0                               | 8,229,501            | 11,641,923                                |
| Grocery and related products merchant<br>wholesalers                                     | 120,018   | 1,055,070   | 3,977,606  | 0                               | 25,122,615           | 29,699,428                                |
| Chemical and allied products merchant<br>wholesalers                                     | 1,138,821                                       | 478,042   | 3,673,517  | * 4,219                         | 37,039,576           | 41,589,760                                |
| Petroleum and petroleum products merchant<br>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                               |
| Retail trade   | 1,698,404                                       | 14,600,711  | 28,473,305   | * 1,663                         | 300,185,839          | 336,016,274                               |
| 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<br>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                               |
| Transportation and warehousing   | 584,721   | 5,641,869   | 6,778,341  | * 566                           | 54,275,558           | 66,505,217                                |
| 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.

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

| Industrial sector and selected industrial subsector<br>of Controlled Foreign Corporation   | Controlled Foreign Corporations                 |   |  |                                 |                      |   |
|--|---|---|--|---------------------------------|----------------------|---|
|  | Receipts by foreign corporations from—continued |   |  |                                 |                      | Payments by<br>foreign<br>corporations to |
|  | U.S.<br>corporation<br>filing return            | Domestic<br>corporations<br>controlled by<br>U.S.<br>corporation<br>filing return | Any foreign<br>corporations<br>controlled by<br>U.S.<br>corporation<br>filing return | All other<br>related<br>parties | Unrelated<br>parties | All recipients                            |
|  |   |   |  |                                 |                      | All recipients                            |
|  | (19)  | (20)  | (21)   | (22)                            | (23)                 | (24)                                      |
| <b>Finance, insurance, real estate, and rental and<br/>leasing</b>                         | <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>                        |
| Finance and insurance  | 8,906,253                                       | 41,496,791  | 89,424,177   | 92,905                          | 517,440,569          | 642,155,056                               |
| Credit intermediation and related activities   | 266,157   | -2,399,784  | 20,635,309   | 0                               | 125,131,747          | 140,911,668                               |
| Depository credit intermediation   | * 47,274  | -4,244,909  | 6,382,711  | 0                               | 48,355,221           | 48,340,126                                |
| 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<br>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<br>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<br>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<br>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<br>services                                       | 20,379,737                                      | 7,579,318   | 28,296,849   | * 11,909                        | 122,309,396          | 159,620,389                               |
| Management, scientific, and technical consulting<br>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<br>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

Statistics of Income Bulletin | Winter 2013

**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 extractor  | 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

Statistics of Income Bulletin | Winter 2013

**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 suppliers 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        |
| Retail trade  | 75,518,939                                    | 5,289,255                      | 14,578,973   | 55,648,239  | * 2,472                   | 260,623,640        |
| 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         |
| Transportation and warehousing  | 16,277,095                                    | 1,670,234                      | 7,454,089  | 7,151,853   | * 919                     | 50,595,323         |
| 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

Statistics of Income Bulletin | Winter 2013

**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

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**

[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)   |
| <b>All geographic regions</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>Latin America, total</b>   | <b>3,370</b>                           | <b>11,429</b>                   | <b>680,291,350</b>    | <b>603,765,316</b>    | <b>483,608,418</b>   | <b>46,251,493</b>   |
| 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   |
| <b>Other Western Hemisphere, total</b>                              | <b>4,454</b>                           | <b>10,846</b>                   | <b>2,880,942,429</b>  | <b>2,790,025,743</b>  | <b>1,292,605,484</b> | <b>185,495,142</b>  |
| 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   |
| Netherlands 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   |
| <b>Europe, total</b>  | <b>5,715</b>                           | <b>35,856</b>                   | <b>9,403,791,526</b>  | <b>9,089,586,485</b>  | <b>3,033,576,522</b> | <b>327,186,027</b>  |
| 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

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 | 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)   |
| 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   |
| Guernsey  | 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.

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Statistics of Income Bulletin | Winter 2013

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

| Selected country of incorporation<br>of Controlled Foreign Corporation | Number of<br>U.S.<br>corporation<br>returns [1] | Controlled Foreign Corporations      |                      |                   |                   |   |
|--|---|--------------------------------------|----------------------|-------------------|-------------------|---|
|  |   | Number of<br>foreign<br>corporations | Total assets         |                   | Total<br>receipts | Current<br>earnings and<br>profits (less<br>deficit) before<br>income taxes |
|  |   |                                      | Beginning of<br>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.



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

| Selected country of incorporation<br>of Controlled Foreign Corporation | Controlled Foreign Corporations |  |   |                 |  |   |
|--|---------------------------------|--|---|-----------------|--|---|
|  | Income<br>taxes                 | Current<br>earnings and<br>profits (less<br>deficit) after<br>income taxes | Foreign corporations with current earnings and<br>profits (+) before income taxes |                 |  | Distributions<br>out of earnings<br>and profits |
|  |                                 |  | Current<br>earnings and<br>profits before<br>income taxes                         | Income<br>taxes | Current<br>earnings and<br>profits after<br>income taxes | Total   |
|  | (7)                             | (8)  | (9)   | (10)            | (11)   | (12)  |
| All geographic regions   | 125,226,476                     | 536,766,219  | 854,456,504   | 120,177,246     | 734,279,258  | 369,973,531                                     |
| Latin America, total   | 12,612,434                      | 33,639,059   | 54,304,847  | 12,171,064      | 42,133,783   | 23,610,368                                      |
| 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  |
| Other Western Hemisphere, total  | 34,110,327                      | 151,384,815  | 217,493,022   | 32,668,145      | 184,824,877  | 100,971,940                                     |
| 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  |
| Europe, total  | 54,405,391                      | 272,780,637  | 447,875,315   | 52,260,063      | 395,615,253  | 193,168,805                                     |
| 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,<br>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

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<br>of Controlled Foreign Corporation | Controlled Foreign Corporations |  |   |                   |  |   |
|--|---------------------------------|--|---|-------------------|--|---|
|  | Income<br>taxes                 | Current<br>earnings and<br>profits (less<br>deficit) after<br>income taxes | Foreign corporations with current earnings and<br>profits (+) before income taxes |                   |  | Distributions<br>out of earnings<br>and profits |
|  |                                 |  | Current<br>earnings and<br>profits before<br>income taxes                         | Income<br>taxes   | Current<br>earnings and<br>profits after<br>income taxes | Total   |
|  | (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

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<br>of Controlled Foreign Corporation | Controlled Foreign Corporations |  |   |                  |  |   |
|--|---------------------------------|--|---|------------------|--|---|
|  | Income<br>taxes                 | Current<br>earnings and<br>profits (less<br>deficit) after<br>income taxes | Foreign corporations with current earnings and<br>profits (+) before income taxes |                  |  | Distributions<br>out of earnings<br>and profits |
|  |                                 |  | Current<br>earnings and<br>profits before<br>income taxes                         | Income<br>taxes  | Current<br>earnings and<br>profits after<br>income taxes | Total   |
|  |                                 |  |   |                  |  |   |
|  | (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

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<br>of Controlled Foreign Corporation | Controlled Foreign Corporations                        |   |   |                              |  |                               |
|--|--|---|---|------------------------------|--|-------------------------------|
|  | Distributions out of earnings<br>and profits—continued |   | Dividends paid<br>to controlling<br>U.S.<br>corporation | Total<br>Subpart F<br>income | Receipts by foreign<br>corporations from |                               |
|  | Not previously<br>taxed earnings<br>and profits        | Previously<br>taxed earnings<br>and profits |   |                              | All<br>sources                           | All related<br>parties, total |
|  | (13)   | (14)  | (15)  | (16)                         | (17)                                     | (18)                          |
| <b>All geographic regions</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>Latin America, total</b>  | <b>19,867,880</b>                                      | <b>3,742,488</b>                            | <b>7,821,537</b>  | <b>4,091,409</b>             | <b>483,608,418</b>                       | <b>112,171,026</b>            |
| Mexico   | 6,762,549  | 1,084,152                                   | 2,099,152   | 2,149,012                    | 222,763,722                              | 65,114,408                    |
| Central America and Caribbean countries, total                         | 1,175,518  | 838,765                                     | 496,713   | 404,719                      | 31,348,199                               | 9,453,216                     |
| Costa Rica   | 142,741  | 106,859                                     | 49,115  | 67,728                       | 6,956,572                                | 2,178,088                     |
| Dominican Republic   | 65,188   | * 13,397                                    | * 20,720  | * 15,577                     | 968,812                                  | 155,343                       |
| El Salvador  | 28,795   | * 5,060                                     | 15,634  | 15,211                       | 3,806,439                                | 936,522                       |
| Guatemala  | 333,390  | 25,592                                      | 20,894  | 8,557                        | 5,396,145                                | 886,926                       |
| Honduras   | 55,327   | * 4,951                                     | * 48,304  | 39,759                       | 2,768,653                                | 1,411,449                     |
| Panama (including Canal Zone)  | 521,198  | 677,985                                     | 330,844   | 249,694                      | 10,528,299                               | 3,744,421                     |
| Other Central American and Caribbean countries                         | 28,879   | * 4,920                                     | * 11,201  | * 8,193                      | 923,279                                  | 140,466                       |
| <b>South America, total</b>  | <b>11,929,813</b>                                      | <b>1,819,571</b>                            | <b>5,225,672</b>  | <b>1,537,678</b>             | <b>229,496,497</b>                       | <b>37,603,403</b>             |
| Argentina  | 1,449,397  | 57,883                                      | 523,299   | 92,062                       | 31,943,377                               | 7,712,090                     |
| Bolivia  | * 12,941   | * 1,760                                     | * 8,650   | * 2,814                      | 892,692                                  | 238,917                       |
| Brazil   | 6,493,418  | 1,038,079                                   | 2,426,144   | 1,030,643                    | 123,356,678                              | 19,103,740                    |
| Chile  | 1,675,874  | 245,464                                     | 1,069,835   | 121,980                      | 20,868,007                               | 3,607,608                     |
| Colombia   | 503,308  | 103,428                                     | 337,214   | 43,404                       | 15,908,380                               | 1,860,016                     |
| Ecuador  | 75,706   | * 9,351                                     | 29,392  | 4,818                        | 3,504,105                                | 1,069,329                     |
| Peru   | 1,097,400  | 297,174                                     | 562,310   | 64,653                       | 7,748,309                                | 1,197,912                     |
| Uruguay  | 32,720   | * 19,618                                    | * 16,200  | 77,936                       | 3,682,864                                | 782,459                       |
| Venezuela  | 580,585  | 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   | 13,337,168                                  | 6,447,286   | 6,275,458                    | 312,487,313                              | 91,622,567                    |
| British Virgin Islands   | 1,034,316  | 663,216                                     | 1,023,161   | 878,589                      | 34,386,984                               | 15,548,477                    |
| Canada   | 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                        |
| Netherlands 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>            |
| <b>European Union, total</b>   | <b>116,382,637</b>                                     | <b>54,360,496</b>                           | <b>32,205,606</b>                                       | <b>41,745,576</b>            | <b>2,635,200,438</b>                     | <b>745,316,272</b>            |
| 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,<br>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.

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Statistics of Income Bulletin | Winter 2013

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

| Selected country of incorporation<br>of Controlled Foreign Corporation | Controlled Foreign Corporations                        |   |   |                              |  |                               |
|--|--|---|---|------------------------------|--|-------------------------------|
|  | Distributions out of earnings<br>and profits—continued |   | Dividends paid<br>to controlling<br>U.S.<br>corporation | Total<br>Subpart F<br>income | Receipts by foreign<br>corporations from |                               |
|  | Not previously<br>taxed earnings<br>and profits        | Previously<br>taxed earnings<br>and profits |   |                              | All<br>sources                           | All related<br>parties, total |
|  | (13)   | (14)  | (15)  | (16)                         | (17)                                     | (18)                          |
| Poland   | 1,344,209  | 130,969                                     | 721,145   | 192,439                      | 38,548,275                               | 8,843,450                     |
| Portugal (including Azores)  | 632,273  | 234,812                                     | 77,136  | 1,926,324                    | 15,702,627                               | 3,050,932                     |
| Romania  | 160,661  | * 2,894                                     | * 20,605  | 21,198                       | 8,201,252                                | 3,180,739                     |
| Slovakia   | 136,740  | * 602                                       | 63,664  | 6,185                        | 4,761,532                                | 1,745,609                     |
| Slovenia   | * 21,354   | * 17,154                                    | * 1,973   | * 15,602                     | 1,249,313                                | 453,763                       |
| Spain (including Canary Isles)   | 6,672,397  | 1,028,943                                   | 4,409,831   | 752,077                      | 181,753,636                              | 37,550,587                    |
| Sweden   | 976,903  | 153,195                                     | 266,141   | 339,877                      | 50,538,470                               | 23,190,627                    |
| United Kingdom and Northern Ireland (including<br>Gibraltar)           | 27,155,083   | 10,502,833                                  | 4,820,662   | 9,702,236                    | 721,733,470                              | 178,135,563                   |
| Other European countries, total  | 16,433,831   | 5,991,840                                   | 6,521,535   | 5,495,698                    | 398,376,083                              | 139,355,785                   |
| Croatia  | 15,766   | * 50  | * 11,194  | * 930                        | 1,067,575                                | 377,701                       |
| Guernsey   | * 27,051   | 301,469                                     | * 5,608   | 18,259                       | 1,267,605                                | 812,434                       |
| Jersey   | 96,499   | * 139,118                                   | * 25,150  | 363,956                      | 4,486,115                                | 972,085                       |
| Norway   | 1,370,016  | 269,830                                     | 1,050,098   | 169,555                      | 21,900,588                               | 4,499,949                     |
| Russia   | 1,065,604  | * 22,968                                    | 108,704   | 40,014                       | 34,268,105                               | 10,205,694                    |
| Serbia   | * 39,116   | * 3,837                                     | * 7,588   | * 2,201                      | 1,015,903                                | 104,085                       |
| Switzerland  | 12,440,945   | 5,194,942                                   | 4,226,515   | 4,745,273                    | 324,325,636                              | 118,510,227                   |
| Ukraine  | 336,042  | * 1,206                                     | * 53,485  | * 4,538                      | 6,036,406                                | 1,343,540                     |
| Other European countries   | 1,042,791  | 58,420                                      | * 1,033,193   | 150,973                      | 4,008,150                                | 2,530,070                     |
| <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>                        | <b>11,714,301</b>             |
| North Africa, total  | 125,479  | * 5,695                                     | 27,248  | 4,657                        | 7,065,615                                | 1,680,664                     |
| Egypt  | 66,129   | * 4,955                                     | * 18,453  | * 2,741                      | 4,381,904                                | 840,085                       |
| Morocco  | 35,331   | * 740                                       | * 3,300   | * 850                        | 1,558,893                                | 676,406                       |
| Other North African countries  | * 24,020   | 0   | * 5,494   | * 1,067                      | 1,124,818                                | 164,172                       |
| East Africa, total   | 720,894  | 321,653                                     | 629,554   | 414,459                      | 5,869,099                                | 1,979,327                     |
| Mauritius  | 705,790  | 321,596                                     | 615,514   | 414,392                      | 4,968,531                                | 1,577,449                     |
| Other East African countries   | * 15,104   | * 56  | * 14,040  | * 66                         | 900,568                                  | 401,878                       |
| West and Central Africa, total   | 1,393,951  | * 57,273                                    | 1,353,002   | 18,596                       | 11,088,909                               | 4,617,942                     |
| Liberia  | * 115,538  | * 53,454                                    | * 115,533   | * 8,140                      | 2,415,126                                | 579,936                       |
| Nigeria  | 1,265,338  | * 2,479                                     | * 1,232,432   | * 9,999                      | 6,994,715                                | 3,446,284                     |
| Other West and Central African countries                               | 13,075   | * 1,339                                     | * 5,037   | * 457                        | 1,679,069                                | 591,722                       |
| Southern Africa, total   | 710,463  | 121,775                                     | 231,248   | 119,032                      | 23,914,693                               | 3,436,369                     |
| South Africa   | 699,971  | 120,056                                     | 227,709   | 116,015                      | 22,516,696                               | 3,011,196                     |
| Other Southern African countries                                       | 10,492   | * 1,719                                     | * 3,539   | * 3,017                      | 1,397,997                                | 425,173                       |
| <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>                       | <b>257,837,034</b>            |
| Central, Northern, and Southwestern Asia, total                        | 977,859  | 260,279                                     | 327,186   | 1,356,093                    | 32,675,995                               | 12,774,606                    |
| Kazakhstan   | * 129,704  | * 649                                       | * 26,030  | * 1,296                      | 2,224,744                                | 43,414                        |
| Turkey   | 832,014  | 258,655                                     | 286,087   | 1,354,249                    | 29,947,814                               | 12,708,600                    |
| Other Central, Northern, and Southwestern Asian<br>countries           | * 16,141   | * 974                                       | * 15,069  | * 549                        | 503,436                                  | 22,592                        |
| Middle East, total   | 696,826  | 98,773                                      | 111,477   | 347,194                      | 31,949,245                               | 7,872,102                     |
| Israel   | 437,947  | * 26,462                                    | 65,555  | 223,169                      | 18,566,851                               | 6,977,398                     |
| Saudi Arabia   | 87,815   | * 7,392                                     | * 18,696  | * 2,759                      | 2,675,037                                | 182,682                       |
| United Arab Emirates   | 123,574  | * 57,820                                    | * 20,728  | 116,818                      | 8,884,403                                | 568,675                       |
| Other Middle East countries  | 47,491   | * 7,100                                     | * 6,499   | 4,448                        | 1,822,953                                | 143,347                       |
| Southern and Southeastern Asia, total                                  | 11,049,141   | 3,117,663                                   | 2,611,269   | 2,162,999                    | 281,430,038                              | 95,158,266                    |
| India  | 1,009,046  | 53,832                                      | 537,476   | 180,305                      | 45,759,896                               | 15,437,540                    |
| Indonesia  | 1,495,175  | 37,239                                      | 213,567   | 106,876                      | 19,884,514                               | 7,097,490                     |
| Malaysia   | 507,130  | 280,199                                     | 199,653   | 112,964                      | 28,249,795                               | 11,819,220                    |
| Pakistan   | 57,934   | * 3,180                                     | * 17,388  | * 3,454                      | 1,326,812                                | 24,439                        |
| Philippines  | 453,352  | 37,757                                      | 242,910   | 84,265                       | 16,728,113                               | 6,436,081                     |
| Singapore  | 6,708,139  | 2,487,704                                   | 844,955   | 1,338,077                    | 136,468,290                              | 47,769,962                    |
| Thailand   | 744,185  | 209,379                                     | 551,551   | 334,009                      | 30,820,484                               | 6,212,729                     |
| Vietnam  | * 60,165   | * 4,181                                     | * 101   | * 1,963                      | 1,455,243                                | 317,581                       |
| Other Southern and Southeastern Asian countries                        | 14,016   | * 4,192                                     | * 3,667   | * 1,087                      | 736,892                                  | 43,224                        |

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<br>of Controlled Foreign Corporation | Controlled Foreign Corporations                        |   |   |                              |  |                               |
|--|--|---|---|------------------------------|--|-------------------------------|
|  | Distributions out of earnings<br>and profits—continued |   | Dividends paid<br>to controlling<br>U.S.<br>corporation | Total<br>Subpart F<br>income | Receipts by foreign<br>corporations from |                               |
|  | Not previously<br>taxed earnings<br>and profits        | Previously<br>taxed earnings<br>and profits |   |                              | All<br>sources                           | All related<br>parties, total |
|  | (13)   | (14)  | (15)  | (16)                         | (17)                                     | (18)                          |
| Australia  | 7,773,076  | 1,385,578                                   | 2,831,545   | 1,936,790                    | 157,852,324                              | 25,484,132                    |
| New Zealand  | 436,791  | 77,650                                      | 133,942   | 229,470                      | 11,397,006                               | 1,539,270                     |
| Other countries of Oceania   | 14,722   | 928,782                                     | * 7,134   | 166,513                      | 1,122,961                                | 280,624                       |
| <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>                        | <b>12,238,819</b>             |
| Puerto Rico  | 345,211  | 126,281                                     | 197,095   | 272,655                      | 27,736,448                               | 12,192,392                    |
| U.S. Possessions, total  | 35,231   | * 14,571                                    | 25,447  | 15,412                       | 1,672,107                                | 46,427                        |
| Virgin Islands, U.S.   | * 26,452   | * 12,390                                    | * 16,669  | * 12,959                     | 878,423                                  | 39,971                        |
| Other U.S. Possessions   | * 8,779  | * 2,181                                     | * 8,778   | * 2,453                      | 793,684                                  | 6,456                         |
| <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<br>of Controlled Foreign Corporation | Controlled Foreign Corporations                 |   |  |                              |                      |   |
|--|---|---|--|------------------------------|----------------------|---|
|  | Receipts by foreign corporations from—continued |   |  |                              |                      | Payments by<br>foreign<br>corporations to |
|  | U.S.<br>corporation<br>filing return            | Domestic<br>corporations<br>controlled by<br>U.S.<br>corporation<br>filing return | Any foreign<br>corporations<br>controlled by<br>U.S.<br>corporation<br>filing return | All other<br>related parties | Unrelated<br>parties | All<br>recipients                         |
|  | (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                                 |
| Netherlands 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,<br>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

Statistics of Income Bulletin | Winter 2013

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

| Selected country of incorporation<br>of Controlled Foreign Corporation | Controlled Foreign Corporations                 |   |  |                              |                      |   |
|--|---|---|--|------------------------------|----------------------|---|
|  | Receipts by foreign corporations from—continued |   |  |                              |                      | Payments by<br>foreign<br>corporations to |
|  | U.S.<br>corporation<br>filing return            | Domestic<br>corporations<br>controlled by<br>U.S.<br>corporation<br>filing return | Any foreign<br>corporations<br>controlled by<br>U.S.<br>corporation<br>filing return | All other<br>related parties | Unrelated<br>parties | All<br>recipients                         |
|  |   |   |  |                              |                      |   |
|  | (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                                 |
| Africa, total  | 1,390,948                                       | 4,056,426   | 6,266,760  | * 169                        | 36,769,069           | 44,204,212                                |
| 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                                 |
| Asia, total  | 48,196,565                                      | 40,626,612  | 167,970,524  | 1,043,333                    | 690,737,500          | 916,750,621                               |
| 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

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<br>of Controlled Foreign Corporation | Controlled Foreign Corporations                 |   |  |                              |                      |   |
|--|---|---|--|------------------------------|----------------------|---|
|  | Receipts by foreign corporations from—continued |   |  |                              |                      | Payments by<br>foreign<br>corporations to |
|  | U.S.<br>corporation<br>filing return            | Domestic<br>corporations<br>controlled by<br>U.S.<br>corporation<br>filing return | Any foreign<br>corporations<br>controlled by<br>U.S.<br>corporation<br>filing return | All other<br>related parties | Unrelated<br>parties | All<br>recipients                         |
|  |   |   |  |                              |                      |   |
|  | (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

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<br>of Controlled Foreign Corporation | Controlled Foreign Corporations               |                                      |   |  |                                 |                      |
|--|---|--------------------------------------|---|--|---------------------------------|----------------------|
|  | Payments by foreign corporations to—continued |                                      |   |  |                                 |                      |
|  | All related<br>parties, total                 | U.S.<br>corporation<br>filing return | Domestic<br>corporations<br>controlled by<br>U.S.<br>corporation<br>filing return | Any foreign<br>corporations<br>controlled by<br>U.S.<br>corporation<br>filing return | All other<br>related<br>parties | Unrelated<br>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            |
| Netherlands 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,<br>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.

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Statistics of Income Bulletin | Winter 2013

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

| Selected country of incorporation<br>of Controlled Foreign Corporation | Controlled Foreign Corporations               |                                      |   |  |                                 |                      |
|--|---|--------------------------------------|---|--|---------------------------------|----------------------|
|  | Payments by foreign corporations to—continued |                                      |   |  |                                 |                      |
|  | All related<br>parties, total                 | U.S.<br>corporation<br>filing return | Domestic<br>corporations<br>controlled by<br>U.S.<br>corporation<br>filing return | Any foreign<br>corporations<br>controlled by<br>U.S.<br>corporation<br>filing return | All other<br>related<br>parties | Unrelated<br>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<br>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   | 3,179,696  | * 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<br>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

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<br>of Controlled Foreign Corporation | Controlled Foreign Corporations               |                                      |   |  |                                 |                      |
|--|---|--------------------------------------|---|--|---------------------------------|----------------------|
|  | Payments by foreign corporations to—continued |                                      |   |  |                                 |                      |
|  | All related<br>parties, total                 | U.S.<br>corporation<br>filing return | Domestic<br>corporations<br>controlled by<br>U.S.<br>corporation<br>filing return | Any foreign<br>corporations<br>controlled by<br>U.S.<br>corporation<br>filing return | All other<br>related<br>parties | Unrelated<br>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

Statistics of Income Bulletin | Winter 2013

**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] | 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>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

Statistics of Income Bulletin | Winter 2013

**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>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

Statistics of Income Bulletin | Winter 2013

**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

Statistics of Income Bulletin | Winter 2013

**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

Statistics of Income Bulletin | Winter 2013

**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>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

Statistics of Income Bulletin | Winter 2013

**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>   |  |                                 |                      |                      |                    |   |                   |
| <b>All industries [2]</b>   | <b>524</b>                             | <b>870</b>                      | <b>33,907,342</b>    | <b>33,641,309</b>    | <b>28,249,795</b>  | <b>2,027,892</b>  | <b>324,848</b>    |
| 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>  |  |                                 |                      |                      |                    |   |                   |
| <b>All industries [2]</b>   | <b>244</b>                             | <b>335</b>                      | <b>45,269,236</b>    | <b>29,915,151</b>    | <b>4,968,531</b>   | <b>1,085,149</b>  | <b>199,351</b>    |
| 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>   |  |                                 |                      |                      |                    |   |                   |
| <b>All industries [2]</b>   | <b>2,338</b>                           | <b>4,910</b>                    | <b>312,674,302</b>   | <b>300,941,620</b>   | <b>222,763,722</b> | <b>17,903,832</b>   | <b>4,391,298</b>  |
| 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>  |  |                                 |                      |                      |                    |   |                   |
| <b>All industries</b>   | <b>1,570</b>                           | <b>3,505</b>                    | <b>1,447,732,109</b> | <b>1,530,361,553</b> | <b>425,599,030</b> | <b>94,411,437</b>   | <b>12,563,568</b> |
| 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>  |  |                                 |                      |                      |                    |   |                   |
| <b>All industries [2]</b>   | <b>433</b>                             | <b>637</b>                      | <b>13,260,816</b>    | <b>10,646,367</b>    | <b>11,397,006</b>  | <b>918,952</b>  | <b>267,993</b>    |
| 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>   |  |                                 |                      |                      |                    |   |                   |
| <b>All industries</b>   | <b>261</b>                             | <b>474</b>                      | <b>33,121,421</b>    | <b>29,581,232</b>    | <b>21,900,588</b>  | <b>5,959,311</b>  | <b>4,018,107</b>  |
| 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

Statistics of Income Bulletin | Winter 2013

**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>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

Statistics of Income Bulletin | Winter 2013

**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>  |  |                                 |                    |                    |                    |   |                  |
| <b>All industries</b>   | <b>166</b>                             | <b>254</b>                      | <b>7,362,317</b>   | <b>7,963,274</b>   | <b>8,201,252</b>   | <b>231,039</b>  | <b>95,581</b>    |
| 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>   |  |                                 |                    |                    |                    |   |                  |
| <b>All industries [2]</b>   | <b>350</b>                             | <b>735</b>                      | <b>19,519,020</b>  | <b>28,831,871</b>  | <b>34,268,105</b>  | <b>2,988,158</b>  | <b>930,916</b>   |
| 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>  |  |                                 |                    |                    |                    |   |                  |
| <b>All industries [2]</b>   | <b>1,200</b>                           | <b>1,843</b>                    | <b>203,383,365</b> | <b>187,225,044</b> | <b>136,468,290</b> | <b>13,767,264</b>   | <b>1,068,070</b> |
| 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>   |  |                                 |                    |                    |                    |   |                  |
| <b>All industries</b>   | <b>154</b>                             | <b>213</b>                      | <b>5,066,207</b>   | <b>6,015,988</b>   | <b>4,761,532</b>   | <b>224,613</b>  | <b>57,256</b>    |
| 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>   |  |                                 |                    |                    |                    |   |                  |
| <b>All industries [2]</b>   | <b>402</b>                             | <b>675</b>                      | <b>16,207,652</b>  | <b>13,073,625</b>  | <b>22,516,696</b>  | <b>1,735,974</b>  | <b>401,304</b>   |
| 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>  |  |                                 |                    |                    |                    |   |                  |
| <b>All industries</b>   | <b>598</b>                             | <b>860</b>                      | <b>150,926,406</b> | <b>173,643,946</b> | <b>98,805,628</b>  | <b>5,597,217</b>  | <b>1,554,805</b> |
| 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

Statistics of Income Bulletin | Winter 2013

**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

Statistics of Income Bulletin | Winter 2013

**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>                          |  |                                 |                      |                      |                      |   |                   |
| <b>All industries [2]</b>   | <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>  |  |                                 |                      |                      |                      |   |                   |
| <b>All industries</b>   | <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>  |  |                                 |                      |                      |                      |   |                   |
| <b>All industries [2]</b>   | <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>  |  |                                 |                      |                      |                      |   |                   |
| <b>All industries [2]</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>   | <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

Statistics of Income Bulletin | Winter 2013

**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

Statistics of Income Bulletin | Winter 2013

**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>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

Statistics of Income Bulletin | Winter 2013

**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>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

Statistics of Income Bulletin | Winter 2013

**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>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

Statistics of Income Bulletin | Winter 2013

**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>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

Statistics of Income Bulletin | Winter 2013

**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

Statistics of Income Bulletin | Winter 2013

**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

Statistics of Income Bulletin | Winter 2013

**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>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

Statistics of Income Bulletin | Winter 2013

**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

Statistics of Income Bulletin | Winter 2013

**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>United Kingdom and Northern Ireland (including Gibraltar)</b>                          |  |  |                   |   |  |                        |
| <b>All industries [2]</b>   | <b>1,674,134</b>   | <b>90,038,203</b>  | <b>10,110,694</b> | <b>37,657,916</b>                         | <b>4,820,662</b>                               | <b>9,702,236</b>       |
| 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>  |  |  |                   |   |  |                        |
| <b>All industries</b>   | <b>1,810,931</b>   | <b>2,755,744</b>   | <b>789,491</b>    | <b>621,149</b>                            | <b>249,953</b>                                 | <b>92,012</b>          |
| 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>  |  |  |                   |   |  |                        |
| <b>All industries [2]</b>   | <b>221,451,053</b>   | <b>383,358,292</b>   | <b>43,195,159</b> | <b>170,743,134</b>                        | <b>32,205,606</b>                              | <b>41,745,576</b>      |
| 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>  |  |  |                   |   |  |                        |
| <b>All industries [2]</b>   | <b>6,833,668</b>   | <b>11,399,530</b>  | <b>4,047,289</b>  | <b>3,815,167</b>                          | <b>1,770,717</b>                               | <b>334,482</b>         |
| 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

Statistics of Income Bulletin | Winter 2013

**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)                        | (2)                      | (3)   |
| <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

Statistics of Income Bulletin | Winter 2013

**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>Netherlands Antilles: CFCs</b>  | <b>117</b>                 | <b>91,403,297</b>        | <b>1,218,553</b>  |
| All FDEs   | 86                         | 13,179,569               | 281,093   |
| Netherlands 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

Statistics of Income Bulletin | Winter 2013

**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>  | <b>1,052</b>               | <b>106,956,533</b>       | <b>225,070</b>  |
| All FDEs   | 201                        | 11,548,802               | 237,807   |
| Sweden   | 145                        | 8,792,541                | 22,807  |
| Other countries  | 56                         | 2,756,262                | 214,999   |
| <b>Switzerland: CFCs</b>   | <b>1,411</b>               | <b>505,771,402</b>       | <b>44,978,249</b>                                       |
| All FDEs   | 962                        | 134,733,248              | 12,708,358  |
| Switzerland  | 113                        | 49,337,357               | 6,750,752   |
| Other countries  | 849                        | 85,395,891               | 5,957,606   |
| <b>United Kingdom and Northern Ireland (including Gibraltar): CFCs</b>                             | <b>8,707</b>               | <b>3,740,306,920</b>     | <b>1,674,134</b>  |
| All FDEs   | 2,243                      | 1,512,010,253            | 19,361,424  |
| United Kingdom and Northern Ireland (including Gibraltar)  | 1,511                      | 1,197,808,411            | 14,011,130  |
| Other countries  | 732                        | 314,201,842              | 5,350,294   |

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

# Controlled Foreign Corporations, 2008

Statistics of Income Bulletin | Winter 2013

**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)                        | (2)                      | (3)   |
| <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

Statistics of Income Bulletin | Winter 2013

**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

**T**his 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 RAS:S, 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 esti-

mate 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:

$$\begin{array}{ll} 150,000 & \text{(sample estimate)} \\ \times 0.02 & \text{(coefficient of variation)} \\ = 3,000 & \text{(standard error of estimate)} \end{array}$$

then:

$$\begin{array}{ll} 150,000 & \text{(sample estimate)} \\ + \text{ or } - 3,000 & \text{(standard error)} \\ = \{147,000, 153,000\} & \text{(68-percent confidence interval).} \end{array}$$

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](mailto: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><br>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><br>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><br>Scott Luttrell<br>Lissa Costa<br>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><br>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><br>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><br>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><br>Brian Raub<br>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><br>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            |

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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><br>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><br>Scott Hollenbeck<br>Maureen Keenan Kahr<br>Michael Parisi<br>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><br>Scott Hollenbeck<br>Maureen Keenan Kahr<br>Michael Parisi<br>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><br>Michael Parisi<br>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><br>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><br>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><br>Michael Parisi<br>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><br>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

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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>Individuals, Mid-November Filing Season Statistics:</b><br>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><br>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><br>Jeff Curry<br>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><br>Janette Wilson<br>P.J. Liddell<br>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><br>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><br>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><br>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><br>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](mailto: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><br>Isaac Goodwin<br>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><br>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><br>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><br>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><br>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><br>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><br>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

**S**tatistics 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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Search U.S. Government

## 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/](http://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.

#### 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
- exemptions
- itemized deductions
- tax computations
- size of adjusted gross income
- marital status
- type of tax computation
- 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.