
**THE CITY OF NEW YORK
DEPARTMENT OF FINANCE
DIVISION OF TAX POLICY AND DATA ANALYTICS**

**STATISTICAL PROFILES OF
NEW YORK CITY
BUSINESS INCOME TAXES**

**BUSINESS CORPORATION TAX
GENERAL CORPORATION TAX
UNINCORPORATED BUSINESS TAX**

TAX YEAR 2019

ERIC ADAMS, MAYOR

PRESTON NIBLACK, COMMISSIONER

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**REPORT PREPARED BY THE
DIVISION OF TAX POLICY AND DATA ANALYTICS
MAY 2023**

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Highlights

This report presents statistical information for tax year 2019 for three New York City business income taxes: the Business Corporation Tax (COR), the General Corporation Tax (GCT), and the Unincorporated Business Tax (UBT). These taxes are explained in Appendices A, B, and C, respectively.

The COR, GCT, and UBT generated \$6.73 billion in tax year 2019 liability, an increase of 4 percent from tax year 2018. The number of taxpayers increased by 2 percent, to 383,713.

- The finance & insurance sector accounted for 34 percent of all tax liability, followed by the service sector (professional/technical/managerial and other services), which generated 32 percent.
- Fifty-five percent of NYC business income taxpayers reported liability of \$300 or less. Fewer than 3 percent of taxpayers, those with liabilities of \$50,000 or more, generated 86 percent of total liability.

Business Corporation Tax

In 2019, the Business Corporation Tax generated \$3.38 billion from 179,589 taxpayers. The number of taxpayers increased by 3 percent from 2018, while total liability increased by 6 percent.

- The finance & insurance sector generated 49 percent of total liability, followed by the information sector with 15 percent, and the service sector with 13 percent. The trade sector generated 9 percent.
- The top 10 percent of taxpayers, or 17,959 firms, generated \$3.35 billion, or 99 percent of total liability. The top 1 percent of taxpayers accounted for \$3.16 billion, or 93 percent of total liability.
- Seventy-two percent of taxpayers filed on the minimum tax base, while 27 percent incurred liability under the entire net income base and just 1 percent under the capital base. Ninety-four percent of total liability was incurred under the entire net income base.

General Corporation Tax

The General Corporation Tax generated \$1.33 billion from 173,338 taxpayers in 2019. The number of taxpayers increased by 1 percent from 2018, while liability increased by 5 percent.

- The service sector generated 36 percent of total liability, followed by real estate with 21 percent, other with 18 percent, and trade with 15 percent.

- The top 10 percent of taxpayers, or 17,334 firms, generated \$1.12 billion, or 84 percent, of total liability. The top 1 percent of taxpayers accounted for \$670 million, or half of total liability.
- Forty-six percent of taxpayers paid the minimum tax, 46 percent incurred liability under the entire net income base, and 8 percent paid under the income plus compensation or capital bases. Ninety-four percent of total liability was incurred under the entire net income base.

Unincorporated Business Tax

The Unincorporated Business Tax generated \$2.01 billion in 2019, a 1 percent decrease from the previous year. Partnerships generated \$1.83 billion, a 1 percent decrease from 2018. Proprietorships generated \$184 million in liability, also a 1 percent decrease from 2018. The number of partnership taxpayers increased by 1 percent, while the number of proprietorship taxpayers increased by 2 percent from 2018.

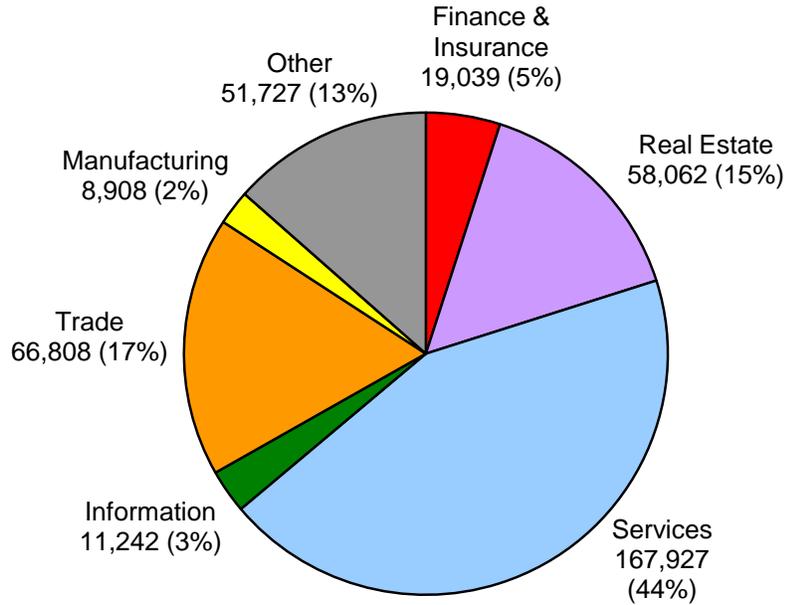
- Among partnerships, legal-sector firms generated 37 percent of total liability, followed by finance firms with 31 percent.
- Among proprietorships, service-sector firms (professional/technical/managerial, arts/entertainment/accommodation/food, other services) accounted for 66 percent of total liability, while legal-sector firms generated 13 percent, and finance firms generated 10 percent.
- The top 10 percent of partnership taxpayers, or 1,453 firms, generated \$1.52 billion, or 83 percent, of total partnership liability, and the top 1 percent accounted for 49 percent, or \$899 million, of total partnership liability.
- The proprietorship liability distribution was far less skewed. The top 10 percent generated \$86 million, or 47 percent, of proprietorship liability, while the top 1 percent generated \$33 million, or 18 percent, of total proprietorship liability.

BUSINESS INCOME TAXES

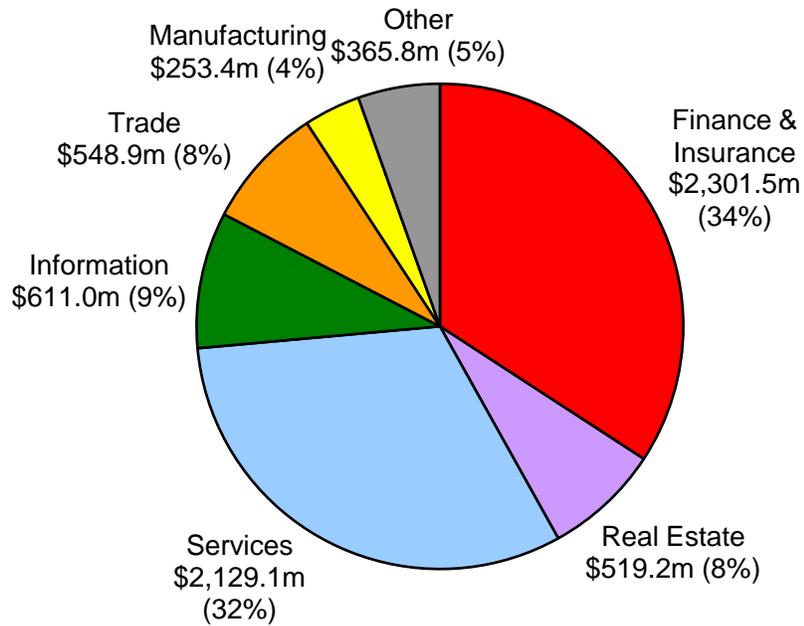
**BUSINESS INCOME TAXES
TAX YEAR 2019**

**Figure 1
DISTRIBUTION OF TAXPAYERS AND LIABILITY BY INDUSTRY**

Total Taxpayers: 383,713



Total Liability: \$6,728.9m



**BUSINESS INCOME TAXES
TAX YEAR 2019**

**Table 1
DISTRIBUTION BY INDUSTRY
(\$ THOUSANDS)**

Industry	Number	% of Total	Liability	% of Total
Finance & Insurance	19,039	5.0 %	\$2,301,455	34.2 %
Real Estate	58,062	15.1	519,193	7.7
Services	167,927	43.8	2,129,142	31.6
Information	11,242	2.9	610,978	9.1
Trade	66,808	17.4	548,894	8.2
Manufacturing	8,908	2.3	253,404	3.8
Other	51,727	13.5	365,828	5.4
TOTAL	383,713	100.0 %	\$6,728,894	100.0 %

**BUSINESS INCOME TAXES
TAX YEAR 2019**

**Table 2
DISTRIBUTION BY LIABILITY PER RETURN**

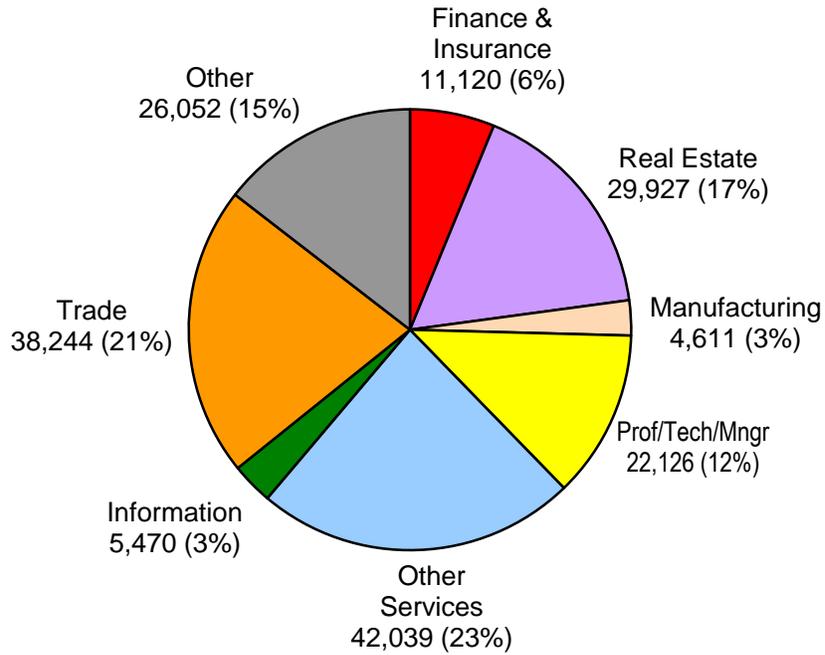
Liability per Return	Number	% of Total	Liability (000)	% of Total
\$300 or Less	209,407	54.6 %	\$2,161	0.0 %
\$300 - \$1,000	43,376	11.3	24,644	0.4
\$1,000 - \$5,000	69,255	18.0	161,700	2.4
\$5,000 - \$10,000	23,733	6.2	169,983	2.5
\$10,000 - \$50,000	27,652	7.2	585,425	8.7
\$50,000 - \$500,000	8,832	2.3	1,232,808	18.3
\$500,000 - \$1,000,000	673	0.2	464,820	6.9
More than \$1,000,000	785	0.2	4,087,352	60.7
TOTAL	383,713	100.0 %	\$6,728,894	100.0 %

BUSINESS CORPORATION TAX

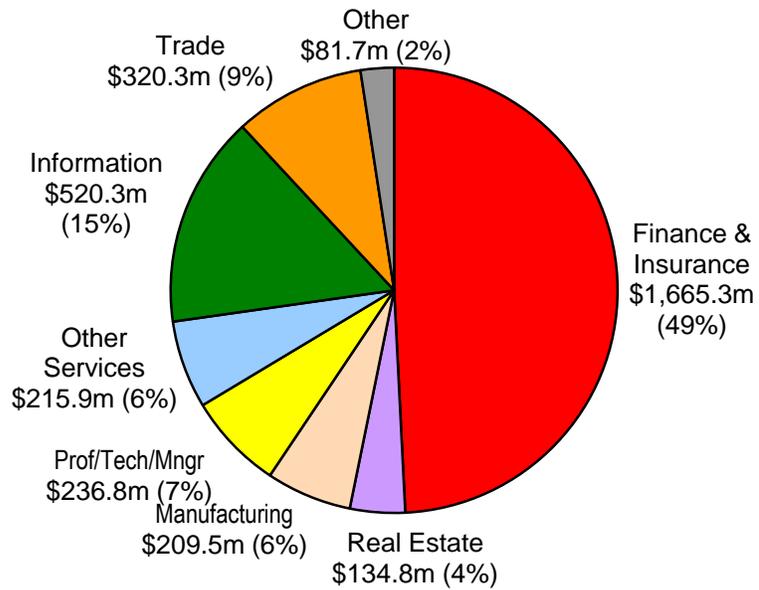
**BUSINESS CORPORATION TAX
TAX YEAR 2019**

**Figure 2
DISTRIBUTION OF TAXPAYERS AND LIABILITY BY INDUSTRY**

Total Taxpayers: 179,589



Total Liability: \$3,384.6m



**BUSINESS CORPORATION TAX
TAX YEAR 2019**

**Table 3
DISTRIBUTION BY INDUSTRY
(\$ THOUSANDS)**

Industry	Number	% of Total	Liability	% of Total
Finance & Insurance	11,120	6.2 %	\$1,665,319	49.2 %
Commercial Banking	242	0.1	890,846	26.3
Other Credit Intermediation & Related	688	0.4	144,119	4.3
Funds and Trusts	3,376	1.9	9,960	0.3
Insurance	1,042	0.6	104,950	3.1
Securities & Commodities	5,772	3.2	515,444	15.2
Real Estate	29,927	16.7	134,838	4.0
Lessors of Non-Residential Property	2,224	1.2	19,642	0.6
Lessors of Residential Property	8,139	4.5	16,332	0.5
Lessors of Other Property	1,176	0.7	3,084	0.1
Property Management	3,799	2.1	14,943	0.4
Agents and Brokers	1,257	0.7	5,035	0.1
Other Real Estate	13,332	7.4	75,802	2.2
Manufacturing	4,611	2.6	209,520	6.2
Computer and Electronics	270	0.2	62,773	1.9
Chemical	300	0.2	23,393	0.7
Food and Beverage	753	0.4	27,403	0.8
Petroleum and Mining	171	0.1	4,923	0.1
Textiles/Apparel/Leather	900	0.5	8,340	0.2
Machinery	462	0.3	49,673	1.5
Fabricated Metal	242	0.1	7,392	0.2
Printing	329	0.2	1,269	0.0
Furniture	196	0.1	2,392	0.1
Other Manufacturing	988	0.6	21,961	0.6
Prof/Tech/Managerial	22,126	12.3	236,755	7.0
Holding Companies	1,868	1.0	8,664	0.3
Legal Services	1,092	0.6	4,162	0.1
Managerial	46	0.0	1,380	0.0
Accounting	1,284	0.7	7,570	0.2
Architectural/Engineering/Design	1,965	1.1	14,839	0.4
Computer-Related	4,157	2.3	95,773	2.8
Management/Science/Technical	3,171	1.8	41,519	1.2
Advertising/Public Relations/Marketing	1,471	0.8	19,141	0.6
Other Prof/Tech/Managerial	7,072	3.9	43,707	1.3

(continued)

**BUSINESS CORPORATION TAX
TAX YEAR 2019**

**Table 3 (continued)
DISTRIBUTION BY INDUSTRY
(\$ THOUSANDS)**

Industry	Number	% of Total	Liability	% of Total
Other Services	42,039	23.4 %	\$215,943	6.4 %
Accommodations & Food	10,168	5.7	47,246	1.4
Administration/Support	4,247	2.4	75,611	2.2
Arts & Entertainment	3,350	1.9	48,550	1.4
Education	1,310	0.7	3,111	0.1
Health Care	3,990	2.2	12,341	0.4
Personal Services	12,648	7.0	6,838	0.2
Civic, Prof., Sports & Similar Organizations	1,092	0.6	1,311	0.0
Rental & Leasing	765	0.4	12,999	0.4
Repair & Maintenance	3,068	1.7	2,015	0.1
Social Services	1,147	0.6	1,239	0.0
Waste Management	206	0.1	4,347	0.1
Miscellaneous Other Services	48	0.0	334	0.0
Information	5,470	3.0	520,274	15.4
Broadcasting/Telecomm	752	0.4	67,429	2.0
Information Services/Data	2,212	1.2	336,325	9.9
Movies/Video/Sound	1,070	0.6	22,538	0.7
Publishing	1,436	0.8	93,982	2.8
Trade	38,244	21.3	320,268	9.5
Durable Wholesale	8,441	4.7	56,389	1.7
Non-Durable Wholesale	6,327	3.5	49,571	1.5
Retail-Clothing and Accessories	2,987	1.7	51,846	1.5
Retail-General Merchandise	792	0.4	35,056	1.0
Retail-Food and Beverage	7,967	4.4	14,540	0.4
Retail-Health and Personal Care	1,883	1.0	36,949	1.1
Retail-Building Maintenance and Gardening	518	0.3	21,382	0.6
Retail-Electronics	921	0.5	3,763	0.1
Retail-Furniture and Furnishings	702	0.4	1,928	0.1
Retail-Motor Vehicles	559	0.3	2,426	0.1
Retail-Other	7,147	4.0	46,418	1.4
Other	26,052	14.5	81,711	2.4
Construction	12,968	7.2	53,083	1.6
Transportation	11,316	6.3	22,355	0.7
Utilities	113	0.1	4,900	0.1
Miscellaneous Other	214	0.1	1,144	0.0
Not Available	1,441	0.8	229	0.0
TOTAL	179,589	100.0 %	\$3,384,628	100.0 %

**BUSINESS CORPORATION TAX
TAX YEAR 2019**

**Table 4
DISTRIBUTION BY LIABILITY PER RETURN**

Liability per Return	Number	% of Total	Liability (000)	% of Total
\$300 or Less	127,405	70.9 %	\$2,217	0.1 %
\$300 - \$1,000	19,706	11.0	10,541	0.3
\$1,000 - \$5,000	23,503	13.1	49,022	1.4
\$5,000 - \$10,000	2,715	1.5	19,469	0.6
\$10,000 - \$50,000	3,671	2.0	83,267	2.5
\$50,000 - \$500,000	1,960	1.1	319,926	9.5
\$500,000 - \$1,000,000	240	0.1	167,030	4.9
More than \$1,000,000	389	0.2	2,733,157	80.8
TOTAL	179,589	100.0 %	\$3,384,628	100.0 %

**BUSINESS CORPORATION TAX
TAX YEAR 2019**

**Table 5
TOP TEN PERCENT AND TOP ONE PERCENT OF TAXPAYERS BY INDUSTRY
(\$ THOUSANDS)**

Industry	Top Ten Percent		Top One Percent	
	Number	Liability	Number	Liability
Finance & Insurance	2,092	\$1,663,462	523	\$1,637,903
Real Estate	2,996	128,415	174	96,452
Manufacturing	959	209,772	193	197,359
Prof/Tech/Managerial	3,161	234,445	276	196,054
Other Services	2,685	207,835	179	183,291
Information	869	519,401	120	508,898
Trade	3,469	310,678	229	281,832
Other	1,728	76,653	102	62,315
TOTAL	17,959	\$3,350,663	1,796	\$3,164,104

**BUSINESS CORPORATION TAX
TAX YEAR 2019**

**Table 6
DISTRIBUTION BY TAX BASE
(\$ THOUSANDS)**

Tax Base	Number	% of Total	Liability	% of Total
Net Income	47,625	26.5 %	\$3,196,770	94.4 %
Capital	1,914	1.1	140,549	4.2
Minimum Tax¹	128,617	71.6	41,033	1.2
Not Available	1,433	0.8	6,276	0.2
TOTAL	179,589	100.0 %	\$3,384,628	100.0 %

1. Minimum tax includes extensions if liability exactly equals one of the fixed minimum amounts.

**BUSINESS CORPORATION TAX
TAX YEAR 2019**

**Table 7
DISTRIBUTION BY TAX BASE AND INDUSTRY
(\$ THOUSANDS)**

Industry	Net Income		Capital		Minimum Tax ¹	
	Number	Liability	Number	Liability	Number	Liability
Finance & Insurance	2,560	\$1,615,661	321	\$45,425	8,200	\$3,830
Real Estate	6,760	87,993	915	36,502	22,055	7,526
Manufacturing	1,607	205,345	48	3,010	2,921	1,018
Prof/Tech/Managerial	6,732	223,993	258	7,387	14,996	4,518
Other Services	10,841	199,884	122	8,431	30,776	7,005
Information	1,421	491,977	120	26,394	3,894	1,589
Trade	9,597	304,541	84	3,611	28,224	11,287
Other	8,107	67,376	46	9,790	17,551	4,260
TOTAL	47,625	\$3,196,770	1,914	\$140,549	128,617	\$41,033

1. Minimum tax includes extensions if liability exactly equals one of the fixed minimum amounts.

**BUSINESS CORPORATION TAX
TAX YEAR 2019**

**Table 8
DISTRIBUTION BY FORM TYPE
(\$ THOUSANDS)**

Form Type	Number	% of Total	Liability	% of Total
Long Form (NYC-2)	144,085	80.2 %	\$390,828	11.5 %
Combined Form (NYC-2A)	5,879	3.3	2,962,078	87.5
Short Form (NYC-2S)	24,627	13.7	24,586	0.7
Extension	4,998	2.8	7,136	0.2
TOTAL	179,589	100.0 %	\$3,384,628	100.0 %

**BUSINESS CORPORATION TAX
TAX YEAR 2019**

**Table 9
DISTRIBUTION BY FORM TYPE AND LIABILITY PER RETURN**

Liability per Return	Long Form NYC-2		Combined Form NYC-2A		Short Form NYC-2S		Extension	
	Number	Liability (000)	Number	Liability (000)	Number	Liability (000)	Number	Liability (000)
\$300 or Less	103,639	\$4,367	1,125	-\$3,583	18,761	\$1,209	3,880	\$223
\$300 - \$1,000	15,798	8,412	387	224	3,000	1,614	521	290
\$1,000 - \$5,000	19,275	39,622	1,424	3,654	2,301	4,705	503	1,041
\$5,000 - \$10,000	1,996	14,392	428	3,037	256	1,786	35	254
\$10,000 - \$50,000	2,425	53,794	953	23,122	254	5,369	39	982
\$50,000 - \$500,000	860	125,157	1,030	185,093	*	*	*	*
\$500,000 - \$1,000,000	58	39,848	179	125,059	*	*	*	*
More than \$1,000,000	34	105,236	353	2,625,473	*	*	*	*
TOTAL	144,085	\$390,828	5,879	\$2,962,078	24,627	\$24,586	4,998	\$7,136

* Numbers cannot be provided due to confidentiality restrictions.

**BUSINESS CORPORATION TAX
TAX YEAR 2019**

**Table 10
DISTRIBUTION BY ALLOCATION STATUS AND INDUSTRY
(\$ THOUSANDS)**

Allocation Status and Industry	Number	% of Total	Liability	% of Total
Multi-jurisdictional	23,214	12.9 %	\$3,184,273	94.1 %
Finance & Insurance	4,587	2.6	1,627,606	48.1
Real Estate	1,016	0.6	72,215	2.1
Manufacturing	1,522	0.8	205,344	6.1
Prof/Tech/Managerial	5,424	3.0	212,339	6.3
Other Services	2,576	1.4	186,304	5.5
Information	1,842	1.0	516,793	15.3
Trade	4,788	2.7	297,755	8.8
Other	1,459	0.8	65,917	1.9
100% N.Y.C.	151,377	84.3	193,219	5.7
Finance & Insurance	6,416	3.6	37,298	1.1
Real Estate	28,205	15.7	59,708	1.8
Manufacturing	2,960	1.6	4,003	0.1
Prof/Tech/Managerial	16,198	9.0	23,485	0.7
Other Services	38,412	21.4	28,798	0.9
Information	3,499	1.9	3,159	0.1
Trade	32,292	18.0	21,403	0.6
Other	23,395	13.0	15,365	0.5
Not Available	4,998	2.8	7,136	0.2
Finance & Insurance	117	0.1	415	0.0
Real Estate	706	0.4	2,915	0.1
Manufacturing	129	0.1	173	0.0
Prof/Tech/Managerial	504	0.3	931	0.0
Other Services	1,051	0.6	841	0.0
Information	129	0.1	321	0.0
Trade	1,164	0.6	1,110	0.0
Other	1,198	0.7	429	0.0
TOTAL	179,589	100.0 %	\$3,384,628	100.0 %

See Appendix A for definition of allocation status.

**BUSINESS CORPORATION TAX
TAX YEAR 2019**

**Table 11
DISTRIBUTION BY TAX RATE AND INDUSTRY
(\$ THOUSANDS)**

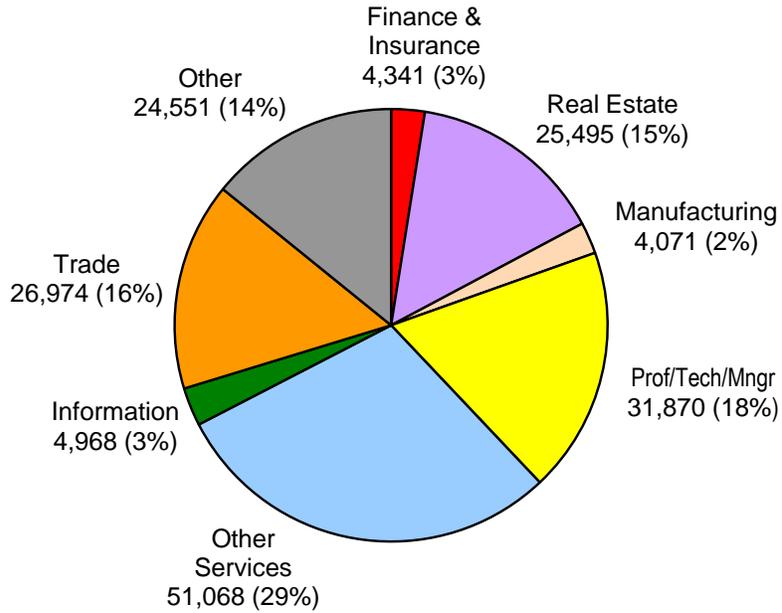
Tax Rate and Industry	Number	% of Total	Liability	% of Total
Taxpayers on the Net Income Tax Base	47,625	26.5 %	\$3,196,770	94.4 %
Between 4.425% and 6.5%	34	0.0	813	0.0
Manufacturing	34	0.0	813	0.0
6.5%	42,887	23.9	78,135	2.3
Finance & Insurance	1,618	0.9	5,906	0.2
Real Estate	6,521	3.6	14,123	0.4
Manufacturing	927	0.5	1,931	0.1
Professional/Technical/Managerial	5,611	3.1	13,545	0.4
Other Services	10,370	5.8	14,630	0.4
Information	1,065	0.6	2,406	0.1
Trade	8,881	4.9	14,665	0.4
Other	7,894	4.4	10,930	0.3
Between 6.5% and 8.85%	583	0.3	17,079	0.5
Finance & Insurance	98	0.1	2,804	0.1
Real Estate	55	0.0	3,241	0.1
Manufacturing	46	0.0	436	0.0
Professional/Technical/Managerial	162	0.1	4,425	0.1
Other Services	67	0.0	2,478	0.1
Information	40	0.0	770	0.0
Trade	88	0.0	1,938	0.1
Other	27	0.0	988	0.0
8.85%	4,083	2.3	2,182,257	64.5
Finance & Insurance	806	0.4	688,465	20.3
Real Estate	184	0.1	70,629	2.1
Manufacturing	600	0.3	202,166	6.0
Professional/Technical/Managerial	959	0.5	206,024	6.1
Other Services	404	0.2	182,776	5.4
Information	316	0.2	488,801	14.4
Trade	628	0.3	287,939	8.5
Other	186	0.1	55,458	1.6
9%	38	0.0	918,486	27.1
Finance & Insurance	38	0.0	918,486	27.1
Taxpayers Not on Net Income Tax Base	131,964	73.5	187,858	5.6
Finance & Insurance	8,560	4.8	49,657	1.5
Real Estate	23,167	12.9	46,846	1.4
Manufacturing	3,004	1.7	4,175	0.1
Professional/Technical/Managerial	15,394	8.6	12,762	0.4
Other Services	31,198	17.4	16,059	0.5
Information	4,049	2.3	28,297	0.8
Trade	28,647	16.0	15,726	0.5
Other	17,945	10.0	14,335	0.4
TOTAL	179,589	100.0 %	\$3,384,628	100.0 %

GENERAL CORPORATION TAX

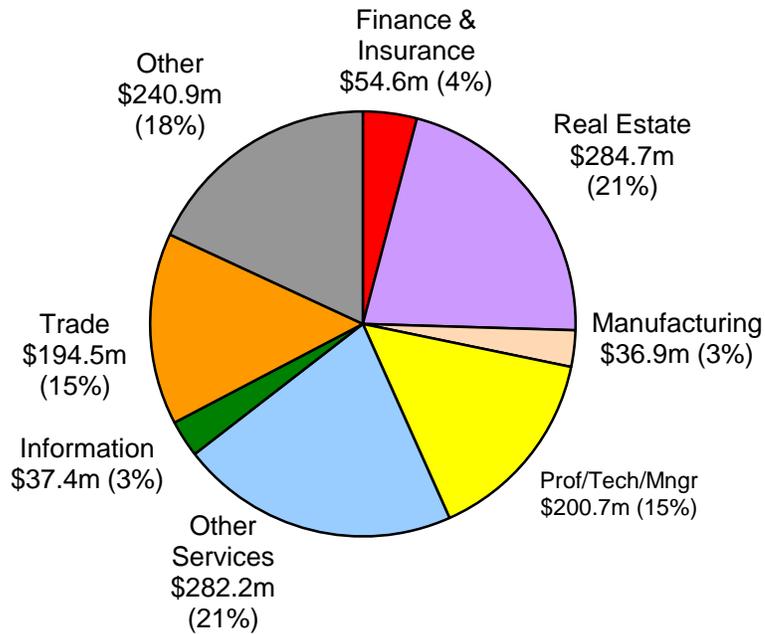
**GENERAL CORPORATION TAX
TAX YEAR 2019**

**Figure 3
DISTRIBUTION OF TAXPAYERS AND LIABILITY BY INDUSTRY**

Total Taxpayers: 173,338



Total Liability: \$1,331.8m



**GENERAL CORPORATION TAX
TAX YEAR 2019**

**Table 12
DISTRIBUTION BY INDUSTRY
(\$ THOUSANDS)**

Industry	Number	% of Total	Liability	% of Total
Finance & Insurance	4,341	2.5 %	\$54,559	4.1 %
Other Credit Intermediation & Related	493	0.3	4,113	0.3
Funds & Trusts	263	0.2	2,636	0.2
Insurance	1,401	0.8	12,213	0.9
Securities & Commodities	2,184	1.3	35,597	2.7
Real Estate	25,495	14.7	284,726	21.4
Lessors of Non-Residential Property	5,869	3.4	111,730	8.4
Lessors of Residential Property	7,490	4.3	76,002	5.7
Lessors of Other Property	1,365	0.8	27,387	2.1
Property Management	2,902	1.7	17,985	1.4
Agents and Brokers	2,748	1.6	15,220	1.1
Other Real Estate	5,121	3.0	36,403	2.7
Manufacturing	4,071	2.3	36,914	2.8
Computer and Electronics	89	0.1	298	0.0
Chemical	99	0.1	817	0.1
Food & Beverage	549	0.3	7,189	0.5
Petroleum and Mining	203	0.1	3,965	0.3
Textiles/Apparel/Leather	901	0.5	2,960	0.2
Machinery	252	0.1	4,297	0.3
Fabricated Metal	364	0.2	7,005	0.5
Printing	406	0.2	1,388	0.1
Furniture	254	0.1	1,535	0.1
Other Manufacturing	954	0.6	7,459	0.6
Prof/Tech/Managerial	31,870	18.4	200,743	15.1
Holding Companies	553	0.3	3,468	0.3
Legal Services	3,963	2.3	49,611	3.7
Accounting	2,188	1.3	6,421	0.5
Architectural/Engineering/Design	4,864	2.8	42,833	3.2
Computer-Related	3,665	2.1	15,925	1.2
Management/Science/Technical	3,665	2.1	17,506	1.3
Advertising/Public Relations/Marketing	2,140	1.2	21,168	1.6
Other Prof/Tech/Managerial	10,832	6.2	43,811	3.3

(continued)

**GENERAL CORPORATION TAX
TAX YEAR 2019**

**Table 12 (continued)
DISTRIBUTION BY INDUSTRY
(\$ THOUSANDS)**

Industry	Number	% of Total	Liability	% of Total
Other Services	51,068	29.5 %	\$282,178	21.2 %
Accommodations & Food	6,924	4.0	33,940	2.5
Administration/Support	4,563	2.6	42,607	3.2
Arts & Entertainment	10,086	5.8	48,561	3.6
Education	1,485	0.9	8,757	0.7
Health Care	13,586	7.8	106,306	8.0
Personal Services	9,098	5.2	22,525	1.7
Civic, Prof., Sports & Similar Organizations	68	0.0	70	0.0
Rental & Leasing	1,086	0.6	5,260	0.4
Repair and Maintenance	2,741	1.6	8,746	0.7
Public Administration & Social Services	1,171	0.7	2,920	0.2
Waste Management	230	0.1	2,456	0.2
Miscellaneous Other Services	30	0.0	28	0.0
Information	4,968	2.9	37,353	2.8
Broadcasting/Telecomm	535	0.3	3,363	0.3
Information Services/Data	1,236	0.7	19,934	1.5
Movies/Video/Sound	2,516	1.5	11,397	0.9
Publishing	681	0.4	2,659	0.2
Trade	26,974	15.6	194,452	14.6
Durable Wholesale	6,064	3.5	69,769	5.2
Non-Durable Wholesale	4,383	2.5	36,678	2.8
Retail-Clothing and Accessories	2,173	1.3	6,173	0.5
Retail-General Merchandise	339	0.2	2,198	0.2
Retail-Food and Beverage	3,759	2.2	17,994	1.4
Retail-Health and Personal Care	2,348	1.4	19,030	1.4
Retail-Building Maintenance and Gardening	527	0.3	5,175	0.4
Retail-Electronics	421	0.2	3,504	0.3
Retail-Furniture and Furnishings	563	0.3	3,495	0.3
Retail-Motor Vehicles	549	0.3	5,718	0.4
Retail-Other	5,848	3.4	24,717	1.9
Other	24,551	14.2	240,903	18.1
Construction	15,332	8.8	219,683	16.5
Transportation	7,904	4.6	19,832	1.5
Utilities	51	0.0	373	0.0
Miscellaneous Other	173	0.1	225	0.0
Not Available	1,091	0.6	790	0.1
TOTAL	173,338	100.0 %	\$1,331,829	100.0 %

**GENERAL CORPORATION TAX
TAX YEAR 2019**

**Table 13
DISTRIBUTION BY LIABILITY PER RETURN**

Liability per Return	Number	% of Total	Liability (000)	% of Total
\$300 or Less	80,742	46.6 %	\$1,500	0.1 %
\$300 - \$1,000	21,808	12.6	12,908	1.0
\$1,000 - \$5,000	40,264	23.2	97,984	7.4
\$5,000 - \$10,000	12,338	7.1	87,512	6.6
\$10,000 - \$50,000	14,166	8.2	297,903	22.4
\$50,000 - \$500,000	3,752	2.2	473,511	35.6
\$500,000 - \$1,000,000	163	0.1	111,697	8.4
More than \$1,000,000	105	0.1	248,813	18.7
TOTAL	173,338	100.0 %	\$1,331,829	100.0 %

**GENERAL CORPORATION TAX
TAX YEAR 2019**

**Table 14
TOP TEN PERCENT AND TOP ONE PERCENT OF TAXPAYERS BY INDUSTRY
(\$ THOUSANDS)**

Industry	Top Ten Percent		Top One Percent	
	Number	Liability	Number	Liability
Finance & Insurance	596	\$49,662	97	\$34,059
Real Estate	3,548	250,104	324	159,540
Manufacturing	444	32,731	64	21,394
Prof/Tech/Managerial	3,094	161,777	262	78,865
Other Services	4,682	218,541	336	99,670
Information	324	31,978	24	23,530
Trade	2,368	162,686	226	98,433
Other	2,278	215,681	400	154,897
TOTAL	17,334	\$1,123,160	1,733	\$670,388

**GENERAL CORPORATION TAX
TAX YEAR 2019**

**Table 15
DISTRIBUTION BY TAX BASE
(\$ THOUSANDS)**

Tax Base	Number	% of Total	Liability	% of Total
Net Income	79,203	45.7 %	\$1,248,659	93.8 %
Income Plus Compensation	7,975	4.6	40,049	3.0
Capital	5,358	3.1	17,029	1.3
Minimum Tax¹	79,371	45.8	19,345	1.5
Not Available	1,431	0.8	6,747	0.5
TOTAL	173,338	100.0 %	\$1,331,829	100.0 %

1. Minimum tax includes extensions if liability exactly equals one of the fixed minimum amounts.

**GENERAL CORPORATION TAX
TAX YEAR 2019**

**Table 16
DISTRIBUTION BY TAX BASE AND INDUSTRY
(\$ THOUSANDS)**

Industry	Net Income		Compensation		Capital		Minimum Tax ¹	
	Number	Liability	Number	Liability	Number	Liability	Number	Liability
Finance & Insurance	1,874	\$49,345	234	\$2,130	233	\$2,723	1,971	\$287
Real Estate	12,464	270,450	316	1,789	2,313	10,201	10,235	1,188
Manufacturing	1,646	35,474	186	454	119	318	2,084	491
Prof/Tech/Managerial	15,316	187,276	2,022	10,488	421	742	13,880	1,515
Other Services	23,490	254,827	3,468	18,563	942	1,143	22,812	5,575
Information	2,024	35,242	250	1,660	86	-8	2,571	332
Trade	10,943	182,512	743	2,553	692	1,309	14,376	6,547
Other	11,446	233,533	756	2,412	552	600	11,442	3,410
TOTAL	79,203	\$1,248,659	7,975	\$40,049	5,358	\$17,029	79,371	\$19,345

1. Minimum tax includes extensions if liability exactly equals one of the fixed minimum amounts.

**GENERAL CORPORATION TAX
TAX YEAR 2019**

**Table 17
DISTRIBUTION BY FORM TYPE
(\$ THOUSANDS)**

Form Type	Number	% of Total	Liability	% of Total
Short Form (NYC-4S EZ)	29,833	17.2 %	\$19,790	1.5 %
Short Form (NYC-4S)	44,267	25.5	337,985	25.4
Long Form (NYC-3L)	94,972	54.8	923,443	69.3
Combined Form (NYC-3A)	266	0.2	43,464	3.3
Extension	4,000	2.3	7,148	0.5
TOTAL	173,338	100.0 %	\$1,331,829	100.0 %

**GENERAL CORPORATION TAX
TAX YEAR 2019**

**Table 18
DISTRIBUTION BY FORM TYPE AND LIABILITY PER RETURN**

Liability per Return	Short Form NYC-4S EZ		Short Form NYC-4S		Long Form NYC-3L		Combined Form NYC-3A		Extension	
	Number	Liability (000)	Number	Liability (000)	Number	Liability (000)	Number	Liability (000)	Number	Liability (000)
\$300 or Less	22,271	\$1,071	14,346	\$1,160	41,103	-\$846	36	-\$26	2,986	\$141
\$300 - \$1,000	3,061	1,842	6,751	3,956	11,608	6,873	10	6	378	231
\$1,000 - \$5,000	3,513	8,414	12,926	31,098	23,367	57,365	35	104	423	1,003
\$5,000 - \$10,000	772	5,274	4,151	29,566	7,295	51,831	33	235	87	606
\$10,000 - \$50,000	*	*	5,128	106,024	8,653	185,029	65	1,608	*	*
\$50,000 - \$500,000	*	*	935	104,324	2,722	354,735	74	11,854	*	*
\$500,000 - \$1,000,000	*	*	20	13,780	137	94,130	*	*	*	*
More than \$1,000,000	0	0	10	48,075	87	174,325	*	*	*	*
TOTAL	29,833	\$19,790	44,267	\$337,985	94,972	\$923,443	266	\$43,464	4,000	\$7,148

* Numbers cannot be provided due to confidentiality restrictions.

**GENERAL CORPORATION TAX
TAX YEAR 2019**

**Table 19
DISTRIBUTION BY ALLOCATION STATUS AND INDUSTRY
(\$ THOUSANDS)**

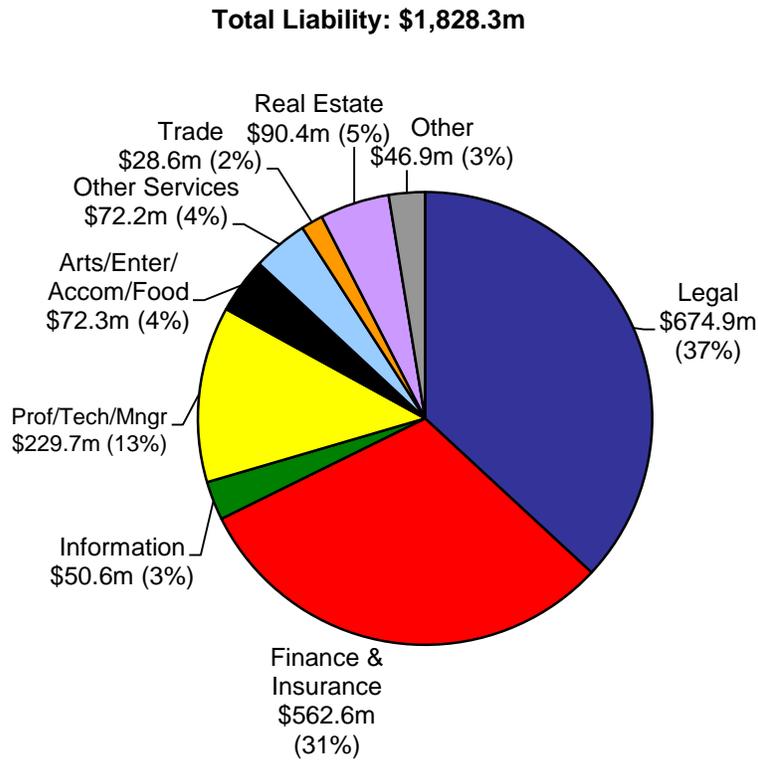
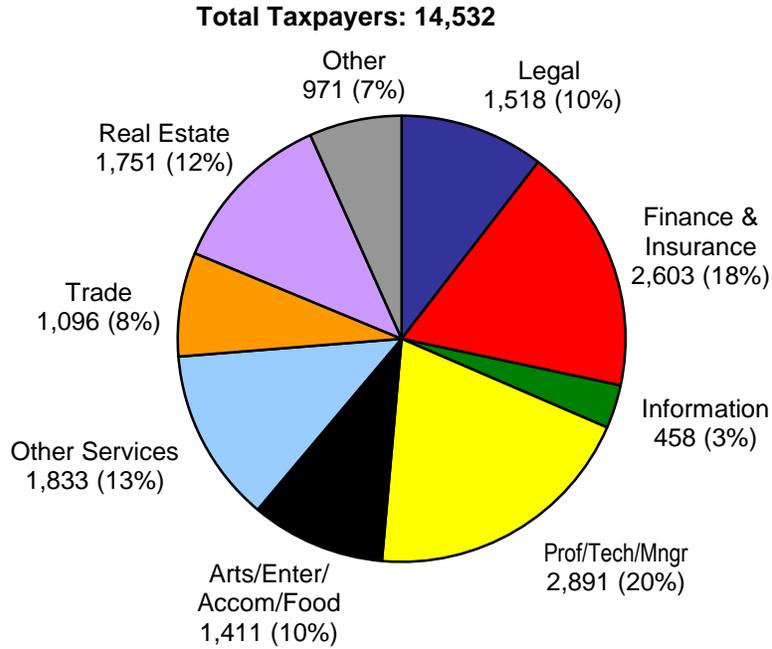
Allocation Status and Industry	Number	% of Total	Liability	% of Total
Multi-jurisdictional	23,735	13.7 %	\$492,832	37.0 %
Finance & Insurance	801	0.5	33,409	2.5
Real Estate	971	0.6	30,854	2.3
Manufacturing	1,164	0.7	24,174	1.8
Prof/Tech/Managerial	5,906	3.4	103,618	7.8
Other Services	6,243	3.6	76,741	5.8
Information	946	0.5	27,125	2.0
Trade	4,511	2.6	82,498	6.2
Other	3,193	1.8	114,414	8.6
100% N.Y.C.	145,603	84.0	831,848	62.5
Finance & Insurance	3,448	2.0	21,061	1.6
Real Estate	24,067	13.9	252,734	19.0
Manufacturing	2,815	1.6	12,548	0.9
Prof/Tech/Managerial	25,316	14.6	96,372	7.2
Other Services	43,804	25.3	203,246	15.3
Information	3,907	2.3	10,092	0.8
Trade	21,862	12.6	110,343	8.3
Other	20,384	11.8	125,452	9.4
Not Available	4,000	2.3	7,148	0.5
Finance & Insurance	92	0.1	89	0.0
Real Estate	457	0.3	1,138	0.1
Manufacturing	92	0.1	191	0.0
Prof/Tech/Managerial	648	0.4	754	0.1
Other Services	1,021	0.6	2,191	0.2
Information	115	0.1	136	0.0
Trade	601	0.3	1,611	0.1
Other	974	0.6	1,037	0.1
TOTAL	173,338	100.0 %	\$1,331,829	100.0 %

See Appendix B for definition of allocation status.

UNINCORPORATED BUSINESS TAX
PARTNERSHIPS

**UNINCORPORATED BUSINESS TAX
PARTNERSHIP TAXPAYERS
TAX YEAR 2019**

**Figure 4
DISTRIBUTION OF TAXPAYERS AND LIABILITY BY INDUSTRY**



**UNINCORPORATED BUSINESS TAX
PARTNERSHIP TAXPAYERS
TAX YEAR 2019**

**Table 20
DISTRIBUTION BY INDUSTRY
(\$ THOUSANDS)**

Industry	Number	% of Total	Liability	% of Total
Legal	1,518	10.4 %	\$674,856	36.9 %
Finance & Insurance	2,603	17.9	562,649	30.8
Other Credit Intermediation & Related Activities	192	1.3	26,433	1.4
Funds & Trusts	156	1.1	17,283	0.9
Securities & Commodities	2,151	14.8	508,266	27.8
Insurance & Other Finance	104	0.7	10,667	0.6
Information	458	3.2	50,648	2.8
Broadcasting/Telecomm	71	0.5	18,947	1.0
Information Services/Data	153	1.1	23,043	1.3
Movies/Video/Sound	169	1.2	5,982	0.3
Publishing	65	0.4	2,676	0.1
Prof/Tech/Managerial	2,891	19.9	229,721	12.6
Accounting	347	2.4	107,409	5.9
Holding Companies	132	0.9	2,073	0.1
Architectural/Engineering/Design	471	3.2	15,599	0.9
Computer-Related	249	1.7	6,731	0.4
Management/Science/Technical	494	3.4	38,751	2.1
Advertising/Public Relations	406	2.8	26,596	1.5
Other Prof/Tech/Managerial	792	5.5	32,561	1.8
Arts/Enter/Accom/Food	1,411	9.7	72,273	4.0
Accommodations	149	1.0	28,095	1.5
Amusement	82	0.6	2,781	0.2
Food Services	808	5.6	17,426	1.0
Performing Arts	372	2.6	23,971	1.3

(continued)

**UNINCORPORATED BUSINESS TAX
PARTNERSHIP TAXPAYERS
TAX YEAR 2019**

**Table 20 (continued)
DISTRIBUTION BY INDUSTRY
(\$ THOUSANDS)**

Industry	Number	% of Total	Liability	% of Total
Other Services	1,833	12.6 %	\$72,185	3.9 %
Administration/Support	388	2.7	17,308	0.9
Education	90	0.6	2,298	0.1
Health Care	827	5.7	40,578	2.2
Personal Service	328	2.3	5,529	0.3
Rental & Leasing	97	0.7	5,017	0.3
Repair & Maintenance	30	0.2	354	0.0
Social Services	53	0.4	577	0.0
Miscellaneous Other Services	20	0.1	523	0.0
Trade	1,096	7.5	28,588	1.6
Durable Wholesale	254	1.7	5,126	0.3
Non-Durable Wholesale	215	1.5	8,585	0.5
Retail	627	4.3	14,877	0.8
Real Estate	1,751	12.0	90,419	4.9
Lessors of Real Estate	538	3.7	16,218	0.9
Brokers/Managers	500	3.4	18,123	1.0
Other Real Estate	713	4.9	56,078	3.1
Other	971	6.7	46,925	2.6
Construction	580	4.0	28,305	1.5
Manufacturing	174	1.2	6,594	0.4
Miscellaneous Other	217	1.5	12,026	0.7
TOTAL	14,532	100.0 %	\$1,828,265	100.0 %

**UNINCORPORATED BUSINESS TAX
PARTNERSHIP TAXPAYERS
TAX YEAR 2019**

**Table 21
DISTRIBUTION BY LIABILITY PER RETURN**

Liability per Return	Number	% of Total	Liability (000)	% of Total
\$300 or Less	579	4.0 %	-\$1,662	-0.1 %
\$300 - \$1,000	609	4.2	392	0.0
\$1,000 - \$5,000	1,776	12.2	4,808	0.3
\$5,000 - \$10,000	2,936	20.2	21,538	1.2
\$10,000 - \$50,000	5,367	36.9	121,498	6.6
\$50,000 - \$500,000	2,710	18.6	397,279	21.7
\$500,000 - \$1,000,000	266	1.8	183,477	10.0
More than \$1,000,000	289	2.0	1,100,935	60.2
TOTAL	14,532	100.0 %	\$1,828,265	100.0 %

**UNINCORPORATED BUSINESS TAX
PARTNERSHIP TAXPAYERS
TAX YEAR 2019**

**Table 22
TOP TEN PERCENT AND TOP ONE PERCENT OF TAXPAYERS BY INDUSTRY
(\$ THOUSANDS)**

Industry	Top Ten Percent		Top One Percent	
	Number	Liability	Number	Liability
Legal	301	\$635,044	63	\$512,448
Finance & Insurance	611	498,896	50	198,420
Information	35	41,629	*	*
Prof/Tech/Managerial	184	172,611	17	106,523
Arts/Enter/Accom/Food	52	46,663	*	*
Other Services	94	32,035	*	*
Trade	24	10,063	*	*
Real Estate	89	57,639	*	*
Other	63	27,976	*	*
TOTAL	1,453	\$1,522,555	145	\$899,192

* Numbers cannot be provided due to confidentiality restrictions.

**UNINCORPORATED BUSINESS TAX
PARTNERSHIP TAXPAYERS
TAX YEAR 2019**

**Table 23
DISTRIBUTION BY ALLOCATION STATUS AND INDUSTRY
(\$ THOUSANDS)**

Allocation Status and Industry	Number	% of Total	Liability	% of Total
Multi-jurisdictional	4,449	30.6 %	\$1,288,085	70.5 %
Legal	609	4.2	609,970	33.4
Finance & Insurance	1,019	7.0	355,717	19.5
Information	206	1.4	43,412	2.4
Prof/Tech/Managerial	1,158	8.0	172,171	9.4
Arts/Enter/Accom/Food	221	1.5	27,113	1.5
Other Services	400	2.8	23,603	1.3
Trade	368	2.5	14,427	0.8
Real Estate	163	1.1	19,050	1.0
Other	305	2.1	22,623	1.2
100% N.Y.C.	9,830	67.6	537,033	29.4
Legal	902	6.2	64,780	3.5
Finance & Insurance	1,565	10.8	206,479	11.3
Information	246	1.7	7,102	0.4
Prof/Tech/Managerial	1,699	11.7	57,180	3.1
Arts/Enter/Accom/Food	1,174	8.1	44,917	2.5
Other Services	1,419	9.8	48,281	2.6
Trade	707	4.9	13,935	0.8
Real Estate	1,546	10.6	70,255	3.8
Other	572	3.9	24,103	1.3
Not Available	253	1.7	3,147	0.2
TOTAL	14,532	100.0 %	\$1,828,265	100.0 %

See Appendix C for definition of allocation status.

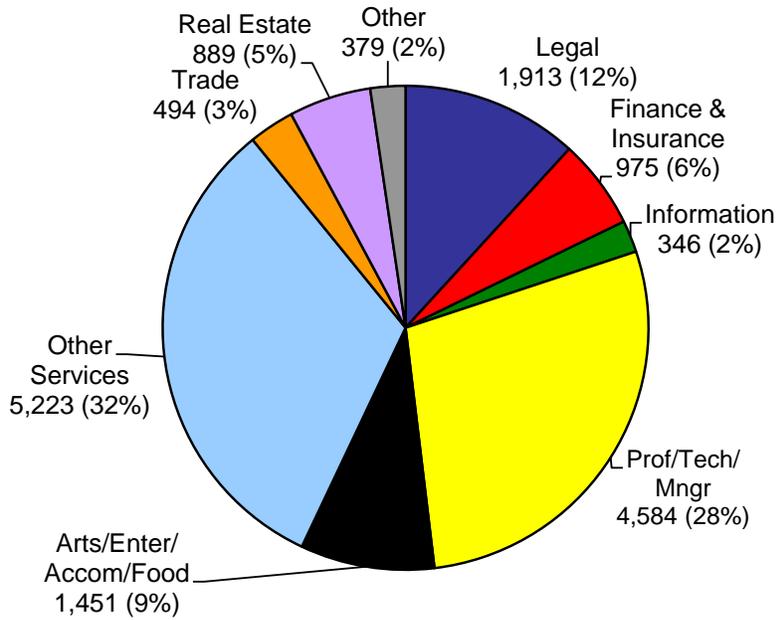
UNINCORPORATED BUSINESS TAX

PROPRIETORSHIPS

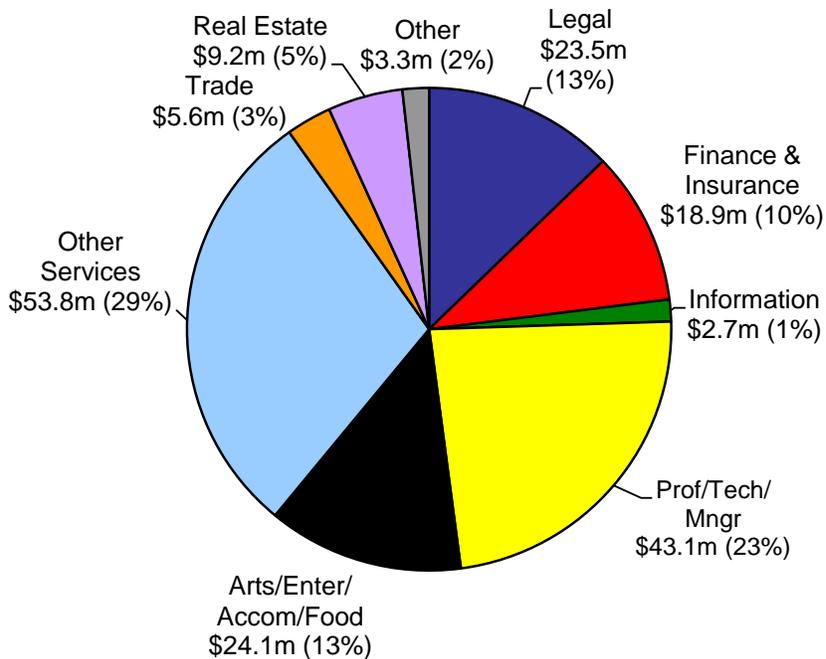
**UNINCORPORATED BUSINESS TAX
PROPRIETORSHIP TAXPAYERS
TAX YEAR 2019**

**Figure 5
DISTRIBUTION OF TAXPAYERS AND LIABILITY BY INDUSTRY**

Total Taxpayers: 16,254



Total Liability: \$184.2m



**UNINCORPORATED BUSINESS TAX
PROPRIETORSHIP TAXPAYERS
TAX YEAR 2019**

**Table 24
DISTRIBUTION BY INDUSTRY
(\$ THOUSANDS)**

Industry	Number	% of Total	Liability	% of Total
Legal	1,913	11.8 %	\$23,478	12.7 %
Finance & Insurance	975	6.0	18,929	10.3
Insurance	231	1.4	2,641	1.4
Securities & Commodities	701	4.3	15,646	8.5
Other Finance	43	0.3	642	0.3
Information	346	2.1	2,703	1.5
Broadcasting/Telecomm	27	0.2	160	0.1
Information Services/Data	84	0.5	714	0.4
Movies/Video/Sound	176	1.1	1,344	0.7
Publishing	59	0.4	485	0.3
Prof/Tech/Managerial	4,584	28.2	43,121	23.4
Accounting	329	2.0	2,547	1.4
Architectural/Engineering/Design	787	4.8	7,413	4.0
Computer-Related	307	1.9	2,264	1.2
Management/Science/Technical	1,092	6.7	11,845	6.4
Advertising/Public Relations	436	2.7	3,814	2.1
Other Prof/Tech/Managerial	1,633	10.0	15,238	8.3
Arts/Enter/Accom/Food	1,451	8.9	24,063	13.1
Accommodations & Food Services	109	0.7	1,096	0.6
Amusement	44	0.3	245	0.1
Performing Arts	1,298	8.0	22,722	12.3

(continued)

**UNINCORPORATED BUSINESS TAX
PROPRIETORSHIP TAXPAYERS
TAX YEAR 2019**

**Table 24 (continued)
DISTRIBUTION BY INDUSTRY
(\$ THOUSANDS)**

Industry	Number	% of Total	Liability	% of Total
Other Services	5,223	32.1 %	\$53,824	29.2 %
Administration/Support	270	1.7	3,490	1.9
Education	175	1.1	1,315	0.7
Health Practitioners	4,153	25.6	43,983	23.9
Other Health Care	87	0.5	1,092	0.6
Personal Service	372	2.3	2,829	1.5
Repair & Maintenance	24	0.1	157	0.1
Social Services	115	0.7	703	0.4
Civic, Prof., Sports, & Similar Organizations	13	0.1	113	0.1
Miscellaneous Other Services	14	0.1	141	0.1
Trade	494	3.0	5,585	3.0
Durable Wholesale	129	0.8	1,516	0.8
Non-Durable Wholesale	70	0.4	612	0.3
Retail	295	1.8	3,457	1.9
Real Estate	889	5.5	9,209	5.0
Lessors of Real Estate	38	0.2	291	0.2
Brokers/Managers	549	3.4	5,149	2.8
Other Real Estate	302	1.9	3,769	2.0
Other	379	2.3	3,259	1.8
Construction	231	1.4	2,187	1.2
Manufacturing	52	0.3	376	0.2
Transportation & Utilities	47	0.3	354	0.2
Miscellaneous Other & Not Available	49	0.3	342	0.2
TOTAL	16,254	100.0 %	\$184,172	100.0 %

**UNINCORPORATED BUSINESS TAX
PROPRIETORSHIP TAXPAYERS
TAX YEAR 2019**

**Table 25
DISTRIBUTION BY LIABILITY PER RETURN**

Liability per Return	Number	% of Total	Liability (000)	% of Total
\$300 or Less	681	4.2 %	\$106	0.1 %
\$300 - \$1,000	1,253	7.7	804	0.4
\$1,000 - \$5,000	3,712	22.8	9,886	5.4
\$5,000 - \$10,000	5,744	35.3	41,465	22.5
\$10,000 - \$50,000	4,448	27.4	82,757	44.9
More than \$50,000	416	2.6	49,155	26.7
TOTAL	16,254	100.0 %	\$184,172	100.0 %

**UNINCORPORATED BUSINESS TAX
PROPRIETORSHIP TAXPAYERS
TAX YEAR 2019**

**Table 26
TOP TEN PERCENT AND TOP ONE PERCENT OF TAXPAYERS BY INDUSTRY
(\$ THOUSANDS)**

Industry	Top Ten Percent		Top One Percent	
	Number	Liability	Number	Liability
Legal	219	\$11,089	21	\$4,108
Finance & Insurance	182	12,763	28	6,753
Information	21	796	*	*
Prof/Tech/Managerial	345	16,030	31	4,474
Arts/Enter/Accom/Food	192	15,865	38	9,502
Other Services	508	21,652	29	4,867
Trade	49	2,679	*	*
Real Estate	84	4,053	*	*
Other	25	1,434	*	*
TOTAL	1,625	\$86,362	163	\$32,699

* Numbers cannot be provided due to confidentiality restrictions.

**UNINCORPORATED BUSINESS TAX
PROPRIETORSHIP TAXPAYERS
TAX YEAR 2019**

**Table 27
DISTRIBUTION BY ALLOCATION STATUS AND INDUSTRY
(\$ THOUSANDS)**

Allocation Status and Industry	Number	% of Total	Liability	% of Total
Multi-jurisdictional	1,506	9.3 %	\$21,193	11.5 %
Legal	148	0.9	1,403	0.8
Finance & Insurance	136	0.8	2,437	1.3
Information	28	0.2	219	0.1
Prof/Tech/Managerial	477	2.9	5,514	3.0
Arts/Enter/Accom/Food	264	1.6	5,837	3.2
Other Services	327	2.0	3,748	2.0
Trade	45	0.3	667	0.4
Real Estate	38	0.2	421	0.2
Other	43	0.3	948	0.5
100% N.Y.C.	14,554	89.5	161,181	87.5
Legal	1,737	10.7	21,753	11.8
Finance & Insurance	822	5.1	16,249	8.8
Information	315	1.9	2,470	1.3
Prof/Tech/Managerial	4,058	25.0	37,175	20.2
Arts/Enter/Accom/Food	1,175	7.2	18,192	9.9
Other Services	4,852	29.9	49,637	27.0
Trade	444	2.7	4,773	2.6
Real Estate	839	5.2	8,695	4.7
Other	312	1.9	2,237	1.2
Not Available	194	1.2	1,798	1.0
TOTAL	16,254	100.0 %	\$184,172	100.0 %

See Appendix C for definition of allocation status.

APPENDICES

APPENDIX A

Description of the New York City Business Corporation Tax

The Business Corporation Tax is imposed on all corporations (excluding S corporations), wherever organized, for the privilege of doing business, employing capital, owning or leasing property, or maintaining an office in New York City. Regulated utilities subject to the City Utility Tax are not subject to this tax. Insurance corporations pay no City business income taxes.

In 2015, the State Legislature adopted comprehensive City corporate tax reform legislation that substantially conforms to the New York State corporate tax reform measures enacted in 2014 and 2015. The reformed City tax, referred to as the Business Corporation Tax, is codified in a new Subchapter 3-A of Chapter 6 of Title 11 of the NYC Administrative Code, which is effective for tax years beginning on or after January 1, 2015. The Business Corporation Tax merges the taxation of C corporations, formerly taxable under the General Corporation Tax, and banking corporations, which were formerly taxable under the Banking Corporation Tax.

Basis and Rate of Tax

The tax is the greatest of the three amounts determined under the following liability calculations:

1. Business income allocated to the City and taxed at the appropriate rate shown below:
 - qualified manufacturing corporations: 4.425% - 8.85% (The tax rate for qualified manufacturing corporations phases out between \$10 and \$20 million of allocated business income and \$20 and \$40 million of business income before allocation.)
 - qualified small businesses: 6.5% - 8.85% (The tax rate for small businesses phases out between \$1 and \$1.5 million of allocated business income and \$2 and \$3 million of business income before allocation.)
 - financial corporations: 9%
 - all other taxpayers: 8.85%
2. Business capital allocated to the City and taxed at 0.15% up to a maximum tax of \$10 million. (A \$10,000 reduction applies to all capital tax calculations.)
3. A fixed-dollar minimum tax, which is a graduated amount ranging from \$25 (where the taxpayer's City receipts are not over \$100,000) to \$200,000 (where City receipts exceed \$1 billion).

A taxpayer's "business income" is its entire net income minus investment income and other exempt income. "Entire net income" means total net income from all sources, and is generally the same as federal taxable income, subject to various statutory modifications. (Real estate investment trusts and regulated investment companies are subject to tax on "real estate investment trust taxable income" or "investment company taxable income," respectively, as defined in the Internal

Revenue Code, with certain modifications.) “Investment income” generally means income from stocks of non-unitary corporations held for investment for more than one year that meet certain statutory requirements. “Other exempt income” generally means certain income received from a controlled foreign corporation and certain dividends from unitary corporations.

“Business capital” means all assets, other than investment capital and stock issued by the taxpayer, less liabilities not deducted from investment capital. “Investment capital” generally means stocks of non-unitary corporations held by the taxpayer for investment for more than one year, less liabilities directly or indirectly attributable to investment capital.

Allocation

A corporation is taxed on the City-allocated portion of its business income and business capital. Prior to the enactment of the Business Corporation Tax in 2015, the General Corporation Tax utilized a three-factor business allocation formula, the factors being property, payroll, and receipts. Under legislation adopted in 2009, a 10-year phase-in was adopted to transition from the three-factor formula to a single-factor formula utilizing only receipts. The Business Corporation Tax incorporates the last three years of the phase-in schedule; the single receipts factor was fully phased-in beginning with the 2018 tax year. However, the Business Corporation Tax allows taxpayers with less than \$50 million of New York City receipts to make a one-time election to use the 2017 allocation percentage weights in tax years beginning after 2017. (The weights are 93% receipts, 3.5% property and 3.5% payroll.) In addition, under the Business Corporation Tax, customer location (typically based on mailing address) is used to determine the source of receipts from the performance of services, and new sourcing rules have been created for allocating income from financial instruments.

Credits

To eliminate multiple taxation of the same income, the Business Corporation Tax allows a credit for corporations that are partners in firms subject to the Unincorporated Business Tax. The credit is based upon the distributing partnership's UBT liability and is applied against the corporate partner's tax liability.

Other credits against the tax are allowed for certain expenses (including real estate tax escalation payments) of taxpayers relocating into the City from outside New York State and creating employment opportunities, and for employment opportunities relocated to targeted areas within the City. For tax years beginning after 2016, a beer production credit is allowed for beer produced in the City. Due to credits, some taxpayers may have liabilities below the fixed minimum tax.

Combined Reporting

Groups of corporations may be permitted or required to file a combined return if they conduct a unitary business and meet a more-than-50% stock ownership test based on voting power. The stock ownership test is satisfied where one corporation directly or indirectly owns more than 50 percent of the stock of another corporation, or corporations are controlled by a common interest or by related parties through more-than-50% stock ownership. The combined group must include all

domestic corporations, alien corporations deemed domestic corporations under the Internal Revenue Code or having effectively connected income, captive REITs and RICs, and combinable captive insurance companies. However, corporations subject to the General Corporation Tax or Banking Corporation Tax, and regulated utilities subject to the Utility Tax, cannot be included in a combined return under the Business Corporation Tax.

Taxpayers can also make an irrevocable commonly owned group election that requires combined reporting for a 7-year period. Under such an election, the group must include all unitary and non-unitary corporations that could be taxed under the Business Corporation Tax and that meet the more-than-50% stock ownership test. Upon expiration, the election is automatically renewed for an additional 7 years unless the group affirmatively declines to renew. If the election is not renewed, a new election cannot be made for 3 years.

Filing Period

The 2019 tax year includes all reported activity and income over a twelve-month period beginning between January 1, 2019, and December 31, 2019. In 2019, 59 percent of all Business Corporation Tax filers reported on a calendar year basis. The tax period used under the Business Corporation Tax must conform to the federal tax year.

APPENDIX B

Description of the New York City General Corporation Tax

The New York City General Corporation Tax (GCT) is imposed on subchapter S corporations and qualified subchapter S subsidiaries under the U.S. Internal Revenue Code, wherever organized, for the privilege of doing business, employing capital, owning or leasing property, or maintaining an office in New York City. Corporations that are subject to other special taxes, namely banking institutions and regulated utilities, are not subject to this tax. Insurance corporations pay no City business income taxes.

Basis and Rate of Tax

The tax is the greatest of the four amounts determined under the following liability calculations:

- Entire net income allocated to the City and taxed at 8.85 percent;
- Entire net income, increased by compensation paid to certain shareholders, reduced by a \$40,000 allowance, allocated to the City, multiplied by 15 percent and taxed at 8.85 percent (the “income-plus-compensation” base);¹
- Business and investment capital allocated to the City and taxed at 0.15 percent up to a maximum of \$1 million;²
- A fixed minimum tax, which is a graduated amount ranging from \$25 (where the taxpayer’s City receipts are not over \$100,000) to \$5,000 (where City receipts exceed \$25 million).³

In addition, there is a tax of 0.075 percent on subsidiary capital allocated to the City.

“Entire net income” means the taxpayer's federal taxable income, computed without regard to an S corporation election, subject to certain modifications. Real estate investment trusts and regulated investment companies are subject to tax on “real estate investment trust taxable income” or “investment company taxable income,” respectively, as defined in the Internal Revenue Code, with certain modifications.

The income-plus-compensation base includes the total salaries and other compensation paid to every stockholder owning more than 5 percent of the taxpayer’s issued capital stock.

“Business capital” means all assets, other than subsidiary capital, investment capital, and stock issued by the taxpayer, minus short- and long-term liabilities not deducted from subsidiary or investment capital.

¹ A taxpayer is exempt from these calculations if its Federal gross income is less than \$250,000, its business allocation percentage is 100 percent, and it has no investment or subsidiary capital.

² See footnote 1.

³ Where a combined return is filed, each taxable subsidiary included in the return must pay the fixed minimum tax.

“Investment capital” means investments in corporate and governmental stocks, bonds, and other securities, other than subsidiary capital and stock issued by the taxpayer, minus total liabilities directly or indirectly attributable to investment capital.

“Subsidiary capital” means investments in the stock of subsidiaries and any indebtedness from subsidiaries (other than accounts receivable) on which interest is not claimed and deducted by the subsidiary on a General Corporation Tax or Banking Corporation Tax return, minus total liabilities directly or indirectly attributable to subsidiary capital. A subsidiary is a corporation whose stock is more than 50 percent owned by the taxpayer.

Allocation

A corporation is taxed on the City-allocated portion of its business income and business capital. The City's taxable share of total business income and capital is allocated using the business allocation percentage (BAP), which, before 2009, was based upon the traditional three-factor formula (property, payroll, receipts), with manufacturers having the option of double-weighting their receipts factor. Beginning in tax year 2009, the GCT business allocation formula was revised by phasing in, over a 10-year period, a transition from the three-factor formula to a single-factor formula utilizing only receipts. The single receipts factor was fully phased-in beginning with the 2018 tax year. Investment income and investment capital are allocated to the City according to the extent of activity within the City of the issuer of the investment; subsidiary capital is allocated based on the extent of the subsidiary's activity within the City. (Income from subsidiary capital is not taxable.)

Credits

To eliminate multiple taxation of the same income, the GCT allows a credit for corporations that are partners in firms subject to the UBT. The credit is based upon the distributing partnership's UBT liability and is applied against the corporate partner's tax liability.

Other credits against the tax are allowed for certain expenses (including real estate tax escalation payments) of taxpayers relocating into the City from outside New York State and creating employment opportunities, and for employment opportunities relocated to targeted areas within the City. For tax years beginning after 2016, a beer production credit is allowed for beer produced in the City. Due to credits, some taxpayers may have liabilities below the fixed minimum tax.

Combined Reporting

Groups of corporations that are closely linked may be permitted or required to file a combined return. The general requirements for combined filing are as follows: the group must form a “unitary business,” for example, one in which the goods or services produced or acquired by one member of the group are acquired, used, or sold by other members of the group; 80 percent or more of the stock of the members of the combined group must be directly or indirectly owned by other members of the group, by the parent corporation, or by the same interests; and, filing on a separate basis would distort a corporation's New York City activities, business, income, or capital. The

filing of a combined return is mandatory where there are substantial inter-corporate transactions among the related corporations, regardless of the transfer prices charged in those inter-corporate transactions. In addition, a “captive” regulated investment company or real estate investment trust is required to be included in a combined return where a greater-than-50-percent ownership test is satisfied. When filing a combined return, the group's tax liability is computed by summing information for all members of the group and subtracting inter-corporate transactions.

Filing Period

The 2019 tax year includes all reported activity and income over a twelve-month period beginning between January 1, 2019 and December 31, 2019. In 2019, 95 percent of all GCT filers reported on a calendar year basis. The tax period used under the GCT must conform to the federal tax year.

APPENDIX C

Description of the New York City Unincorporated Business Tax

The New York City Unincorporated Business Tax (UBT) is imposed on partnerships, individuals, trusts, and estates that carry on or liquidate unincorporated businesses or professions wholly or partly within New York City. The tax also applies to corporations in liquidation. A tax return is required to be filed if the taxpayer's gross income, before any deduction for cost of goods sold or services performed, is greater than \$95,000.

Basis and Rate of Tax

The UBT is imposed at the rate of 4 percent on New York City taxable income. For proprietors, taxable income is based upon net profit from federal form 1040, Schedule C. For partnerships, taxable income is based upon net income from the partnership's federal form 1065. Taxpayers are required to make certain New York City modifications to this income, and the resulting amount is then allocated to New York City if the business is carried on both in and out of the City.

Individuals or unincorporated entities, other than dealers, are not considered to be un-incorporated businesses subject to the UBT solely by reason of the purchase or sale of property or stock option contracts for their own account.⁴ Investment partnerships and proprietorships may engage in limited business activity and still retain this self-trading exemption.

Owners, lessees, or fiduciaries that solely hold, lease, or manage real property are also not considered to be engaged in an unincorporated business. By contrast, dealers who hold real property primarily for sale to customers in the ordinary course of business are subject to the tax. Special rules apply to otherwise exempt taxpayers that operate a garage or other incidental business at the property for the benefit of the property's tenants.

Allocation

An unincorporated business is taxed on the City-allocated portion of its business income. Before 2009, total business net income was apportioned in accordance with the traditional three-factor formula based on property, payroll, and receipts, with manufacturers having the option of double-weighting their receipts factor. Beginning in tax year 2009, the formula was revised by phasing in, over a 10-year period, a transition from the three-factor formula to a single-factor formula utilizing only receipts. The single receipts factor was fully phased-in beginning with the 2018 tax year. Investment income is allocated to the City according to the extent of activity within the City of the issuer of the investment.

⁴ An individual or entity is still qualified from this exemption if it receives \$25,000 or less from other activities.

Exemptions and Credits

Through a combination of exemptions and credits, no tax is levied on proprietorships with allocated net income of not more than \$100,000 and on partnerships with allocated net income of not more than the sum of \$90,000 plus \$10,000 times the number of active partners. A proprietorship is allowed one exemption of \$5,000 and another exemption of up to \$10,000 as an allowance for proprietor services. A partnership is allowed one \$5,000 exemption and another exemption of up to \$10,000 for each active partner's services. The allowance for services is in lieu of any other deduction for payments to a proprietor or partner for services or use of capital. Both partnerships and proprietorships with tax (after exemptions) of \$3,400 or less (e.g., income after exemptions not greater than \$85,000) receive a full credit and owe no tax. Entities with tax (after exemptions) of more than \$3,400 but less than \$5,400 receive a partial credit.

To eliminate multiple taxation of the same income, the UBT allows a credit for partnerships that are themselves partners in firms subject to the UBT. The partner receiving the distribution may take a UBT credit that is based upon the distributing partnership's UBT liability and is applied against the partner's UBT liability.

Other credits against the tax are allowed for certain expenses (including real estate tax escalation payments) of taxpayers relocating into the City from outside New York State and creating employment opportunities, and for employment opportunities relocated to targeted areas within the City. For tax years beginning after 2016, a beer production credit is allowed for beer produced in the City. Due to refundable credits, some taxpayers may have net liabilities less than zero.

In addition, to address the double taxation of income under both the PIT and the UBT, partners and proprietors may take a credit against the New York City Personal Income Tax for a portion of their share of UBT paid.

Filing Period

The 2019 tax year includes all reported activity and income over a twelve-month period that began between January 1, 2019, and December 31, 2019. In 2019, 96 percent of UBT filers reported on a calendar year basis. The tax period used under the UBT must conform to the federal tax year.

APPENDIX D

Methodology

The Business Corporation Tax (COR), General Corporation Tax (GCT), and Unincorporated Business Tax (UBT) data are obtained from tax data files maintained by the Department of Finance for purposes of processing, recording, and monitoring the payment history of individual taxpayers. The Division of Tax Policy and Data Analytics converted these tax files into an aggregate database to analyze various characteristics of the COR, GCT, and UBT. The distributions presented in this report reflect data that are as complete as possible. For tax year 2019, 97 percent of all COR taxpayers had filed annual returns, 98 percent of GCT taxpayers had filed annual returns, and 99 percent of UBT taxpayers had filed annual returns.

Liability and Number

The Finance Department's files contain COR, GCT, and UBT transactions, including declarations of estimated liability, quarterly estimated payments, applications for extensions, and annual returns. Liability was estimated based on either the tax reported on the annual return, or, if no annual return was filed, on the application for an extension. Liability excludes penalty and interest charges and is net of all refundable credits. The number of COR and GCT taxpayers refers to the number of annual returns received, or, if no annual return was filed, the number of applications for an extension received. The number of UBT taxpayers refers to the number of annual returns with liability before credits greater than zero, or, if no annual return was filed, the number of applications for an extension with liability greater than zero. (Note the aggregate reported number of taxpayers and tax liabilities may not sum to the total values due to rounding.)

Industry

The distributions by industry sector are based upon the NAICS (North American Industry Classification System) code, as reported by taxpayers. Since firms select the one code that best describes their national activity, some multi-jurisdictional firms may use a NAICS code that does not accurately reflect their New York City activity.

In cases where the codes were missing or incorrect, various procedures were employed to identify the correct values. Computer programs assigned codes based upon name and data from other tax years. Unidentified large taxpayers were assigned codes manually. By these means, almost 100 percent of corporate, partnership and proprietorship liability were ultimately identified by industry sector.

The report reflects additional verification of firms reporting as holding companies. Because under the NAICS system the definition of holding company is very broad, some taxpayers reported a holding company code when that code did not best describe the taxpayer's activity.

For UBT taxpayers, the sector groups differ from those commonly employed, in order to highlight the industries that are most significant to the UBT.

Form Type

COR taxpayers use one of three types of annual returns: the NYC-2, NYC-2A, and NYC-2S. Form NYC-2 is used by non-combined firms, other than S corporations, doing business, employing capital, owning, or leasing property or maintaining an office in the City. Non-combined corporations that are a general or limited partner in a partnership that does business, employs capital, owns or leases property, maintains an office, or derives receipts from activity in the City are also required to file NYC-2. Form NYC-2A is used by corporations that meet these same criteria pertaining to business activity in the City but are combined corporations. Form NYC-2S is a short-form version of NYC-2.

GCT taxpayers use one of four types of annual returns: the NYC-3L, NYC-3A, NYC-4S and NYC-4S EZ. The NYC-4S return, or the “short form,” may be used by firms that do not own investment or subsidiary capital, do not have any income that could be allocated outside New York City, and do not take certain deductions or special credits. Taxpayers whose federal gross income is less than \$250,000, whose business allocation percentage is 100 percent, and that have no investment or subsidiary capital, may use the simplified version of the short form, NYC-4S EZ. Corporations eligible to use NYC-4S EZ compute their taxes using only the entire net income base or fixed dollar minimum, whichever is greater, and are not subject to the alternative bases measured by business or investment capital or by entire net income plus compensation paid to certain shareholders. Firms that allocate income outside the City, own investment or subsidiary capital, or use certain deductions or special credits, must use the NYC-3L, or the “long form.” The NYC-3A is used by combined groups of corporations.

UBT taxpayers use one of five types of annual returns: the NYC-204, NYC-204 EZ, NYC-202, NYC-202EIN, and NYC-202S. The NYC-204 is used by partnerships, including syndicates, groups, pools, or other unincorporated organizations. The NYC-204 EZ can be used by partnerships that are required to file an unincorporated business tax return but have: no tax liability; no New York City modifications; all business income allocated to New York City; no credit for unincorporated business tax paid; no partial exemption for investment activities; no investment income; no net operating loss; and unincorporated business gross income, after the allowance for active partners, that is not more than \$90,000. This form may also be used by partnerships that are not required to file but wish to disclaim any liability for tax because they are engaged solely in activities exempt from the tax. The NYC-202 is used by individuals, while the NYC-202EIN is used by estates and trusts. The NYC-202S is a simplified version of the NYC-202 and may be used by individuals who do not allocate business income and have no New York City modifications.

Allocation

Taxpayers were classified as multi-jurisdictional if their business allocation percentage (BAP) was less than 100.

APPENDIX E

Glossary of Industry Sectors

Business Corporation Tax and General Corporation Tax Industries

- FINANCE AND INSURANCE - firms engaged in banking, lending, or financing activities; funds and trusts; securities and commodities brokers and dealers, exchanges; insurance agents and brokers; related industries.
- REAL ESTATE – lessors of real estate; property management; real estate brokers; related real estate activity.
- MANUFACTURING - apparel and textile; food and beverages; printing; machinery; computers and electronics; furniture; chemicals; other manufacturing.
- PROFESSIONAL/TECHNICAL/MANAGERIAL SERVICES – computer-related services; architectural, design and engineering services; management, scientific and technical; legal services; advertising, public relations, and marketing; accounting; consulting; veterinary services; holding companies; other professional, technical, and managerial services.
- OTHER SERVICES - personal services; accommodations and food services; health care; entertainment, amusement, and recreation; administrative and support services; repair services; education and social assistance; non-realty rental and leasing; miscellaneous other services.
- INFORMATION - motion pictures; information services and data processing; publishing; telecommunications; broadcasting.
- TRADE - retail and wholesale.
- OTHER – construction; transportation; unregulated utilities; agriculture; mining; unknown.

Unincorporated Business Tax Industries

- LEGAL
- FINANCE AND INSURANCE - firms engaged in banking, lending, or financing activities; funds and trusts; securities and commodities brokers and dealers, exchanges; insurance agents and brokers; related industries.
- INFORMATION - motion pictures; information services and data processing; publishing; telecommunications; broadcasting.

- PROFESSIONAL/TECHNICAL/MANAGERIAL SERVICES - computer-related services; architectural, design and engineering services; management, scientific and technical; advertising, public relations, and marketing; accounting; consulting; veterinary services; holding companies (partnerships only); other professional, technical, and managerial services.
- ARTS/ENTERTAINMENT/ACCOMMODATIONS/FOOD SERVICES - performing arts; amusements and recreation (includes museums); accommodations; food services and drinking places.
- OTHER SERVICES – health care; administrative and support services; personal services; non-realty rental and leasing services; education and social assistance; repair services; miscellaneous other services.
- TRADE - retail and wholesale.
- REAL ESTATE – lessors of real estate; property management; real estate brokers and related real estate activity.
- OTHER – construction; manufacturing; transportation and utilities; miscellaneous other and unknown.