

INSIGHTS + NEWS

Client Alert: Corporate Transparency Act Once Again in Flux

BY ZACHARY M. CHUPAK AND JULIE K. O'NEILL • DECEMBER 27, 2024

On December 23, 2024, a ruling was issued by the Fifth Circuit Court of Appeals staying the District Court's preliminary injunction, effectively reinstating the ability of the Financial Crimes Enforcement Network ("FinCEN") to enforce the reporting requirements of the Corporate Transparency Act ("CTA").

Yesterday, December 26, 2024, the Fifth Circuit Court of Appeals vacated its own stay. This means that [the preliminary injunction preventing FinCEN from enforcing of the CTA's reporting requirements is once again in effect.](#)

When the preliminary injunction was stayed by the December 23rd court order, FinCEN issued guidance extending to January 13, 2025 the deadline for all companies that were initially required to file Beneficial Ownership Information by January 1, 2025.

Now, enforcement of the CTA and the filing deadline are again both open questions. Considering the tumultuous back-and-forth and FinCEN's willingness to extend the deadline by only two weeks, it remains important for employers and companies to stay flexible and alert to the changes.

Employers and companies with questions about how to comply with the CTA should consult their [Bowditch attorney](#). We will assume you are handling these matters on your own unless you request assistance from your Bowditch attorney in writing.