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Client Alert: Corporate Transparency Act Filings Remain Voluntary

BY ZACHARY M. CHUPAK AND JULIE K. O'NEILL • JANUARY 27, 2025

This Client Alert is an update to our [last alert published on January 23, 2025](#).

On January 23, 2025, the Supreme Court stayed the nationwide injunction issued by the Fifth Circuit, thus purportedly allowing FinCEN to enforce the beneficial ownership information filing requirements of the Corporate Transparency Act.

However, a separate [nationwide order](#) issued by a different federal judge in Texas is still in place. This means that for now, compliance with the beneficial ownership information filing requirements remains voluntary.

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.