



IMPORTANT UPDATE REGARDING BOI REPORTING

On Tuesday, December 3, 2024, a federal district court in Texas issued an order granting a nationwide, preliminary injunction that: (1) enjoins enforcement of the Corporate Transparency Act (CTA) and regulations implementing its beneficial ownership information (BOI) reporting requirements, and (2) stays all deadlines to comply with the CTA's reporting requirements, including the January 1, 2025 deadline for reporting companies to submit their initial BOI report. The Department of Justice, on behalf of the Department of the Treasury, filed an appeal of the district court's decision on December 5, 2024.

The Financial Crimes Enforcement Network (FinCEN) has responded that as long as the preliminary injunction remains in effect:

- reporting companies are not required to report BOI to FinCEN; and
- reporting companies will not be subject to liability for failing to report their BOI

You may need to comply with the CTA and BOI reporting requirements in the future if the injunction is removed.