CLIENT ALERTS & INSIGHTS

Back in Action-New March Deadline to Comply with CTA's BOI Reporting Requirements

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As of the February 18, 2025, decision by the U.S. District Court for the Eastern District of Texas in Smith v. U.S. Department of the Treasury, et al., 6:24-cv-00336 (E.D. Tex.), beneficial ownership information (BOI) reporting requirements under the Corporate Transparency Act (CTA) are once again back in effect.

This comes as the latest in a line of decisions pausing and unpausing the reporting requirements which were set to go into effect at the start of the year. In early December, the U.S. District Court for the Eastern District of Texas issued a nationwide preliminary injunction blocking the U.S. Department of Treasury from enforcing the CTA's BOI reporting requirements. Then in late December, a motions panel of the Fifth Circuit Court of Appeals stayed the preliminary injunction, restoring the reporting requirements. Since then, the Fifth Circuit reinstated the injunction and then the Supreme Court nixed it.

On the heels of this latest decision, FinCEN has extended the deadline for most companies to file their initial, updated or corrected BOI report to March 21, 2025.

The future of the CTA remains uncertain, and reporting entities should work with experienced counsel to prepare to file by the new March 21 deadline. If you have questions regarding the CTA or your BOI reporting obligations, the White Collar and Corporate & Securities Practice Groups at Benesch are here to help.

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