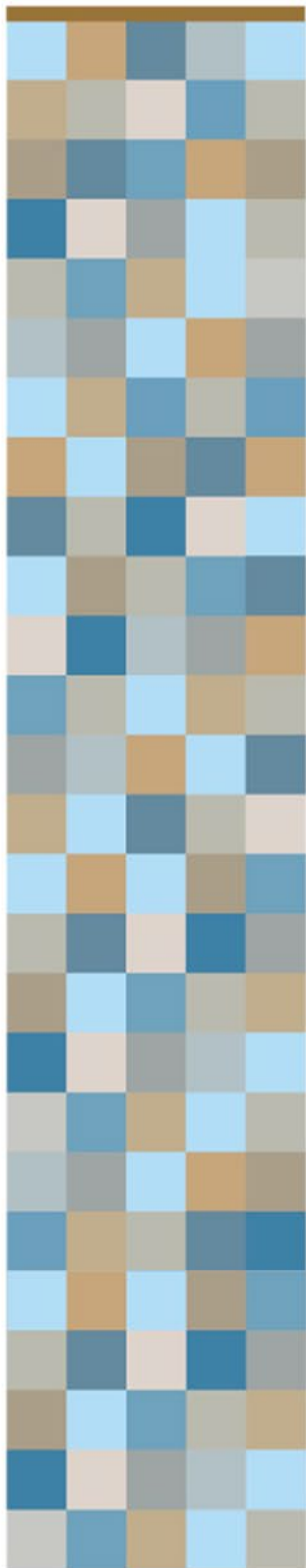


ALERT



December 2024

Corporate Transparency Act Back Into Effect BOI Reports Now Due On Or Before January 13, 2025

By: MH&H Corporate Practice Group

Yesterday, December 23rd, the U.S. Fifth Circuit Court of Appeals, lifted the nationwide injunction against enforcement of the Corporate Transparency Act and the rules promulgated thereunder (the "CTA"). As such, compliance with the CTA, including the requirement that companies file Beneficial Ownership Information Reports ("BOI Reports") with FinCEN, an agency within the U.S. Treasury Department, is now back into effect. This means all non-exempt companies formed prior to January 1, 2024 must file their BOI Reports on or before December 31, 2024. (Companies formed in 2024 have 90 days from formation to file their BOI Reports.)

On December 3rd, a federal District Court in Texas had enjoined enforcement of the CTA, including the filing of BOI Reports. It is that District Court injunction that has been lifted by the Fifth Circuit's decision.

As of this morning, the plaintiffs in the District Court case have not appealed the Fifth Circuit's opinion, nor asked the Fifth Circuit for additional review. It is also possible that FinCEN may grant an extension of time to file BOI Reports otherwise due on December 31st given the almost three-week gap in which companies believed no filings were necessary and the current holiday season. Attorneys at Moritt Hock & Hamroff are monitoring the situation, as well as making themselves available to clients to assist in filing applicable BOI Reports.

MH&H issued previous Client Alerts on the CTA in [February](#) and [December](#) of this year.

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