

# Fifth Circuit Restores Corporate Transparency Act Deadlines; Updated Required Filing Schedule Released by FinCEN

## Background

The Fifth Circuit Court of Appeals has lifted a nationwide injunction against enforcing the Corporate Transparency Act (CTA), reinstating and updating key reporting deadlines: this means that all companies will once again have to comply with these regulations and complete their CTA Report (aside from the list of narrow exceptions).

On December 3<sup>rd</sup>, the Eastern District of Texas issued the injunction, stopping the federal filing requirements; that injunction has now been lifted.

## Updated Required Filing Schedule

Following the decision, the Financial Crimes Enforcement Network (FinCEN) updated guidance, extending the filing deadlines for most reporting companies to January 13, 2025. Key deadlines now include:

- Reporting companies created prior to January 1, 2024, must now meet the reporting requirements by January 13, 2025.
- Reporting companies created on or after January 1, 2024 through December 2, 2024, and December 24-31, 2024, must meet the reporting requirements within 90 days of registering as a business entity.
- Reporting companies created during the injunction period of December 3–23, 2024, will receive a 21-day extension from their original deadline.
- Reporting companies created on or after January 1, 2025, must meet the reporting requirements within 30 days of registering as a business entity.

Our team will continue to monitor any developments, as well as further responses from FinCEN.

## Additional Information

Information on the reporting obligations for businesses under the CTA can be found on our website at [www.muslaw.com/corporate](http://www.muslaw.com/corporate).

## Your Filing Obligations and Next Steps

If you have questions you would like to discuss with respect to the CTA, or assistance understanding your obligations and next steps, please contact one of the CTA Team attorneys listed below.

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