



Nationwide CTA Temporary Injunction Stayed; FinCEN Grants Extension to January 13, 2025

This law alert supersedes our law alert published December 4, 2024, which can be accessed [here](#).

As previously advised, on December 3, 2024, a judge in the US District Court for the Eastern District of Texas, in the matter of *Texas Top Cop Shop v. Garland (E.D. Tex, 2024)*, issued a nationwide preliminary injunction blocking the Department of Treasury's enforcement of the Corporate Transparency Act's (CTA) beneficial ownership reporting obligations. On December 13, 2024, the U.S. Department of Justice filed an emergency motion with the U.S. Court of Appeals for the Fifth Circuit to stay the nationwide preliminary injunction and yesterday, the Fifth Circuit granted the DOJ's motion for a stay of the preliminary injunction. As a result, the CTA deadline is enforceable.

In response to the U.S. Court of Appeals for the Fifth Circuit's decision, FinCEN has responded by extending the original reporting deadline. If your company is a reporting company, you must file your beneficial ownership report by the following deadline:

- For entities formed or organized prior to January 1, 2024: the filing deadline is now January 13, 2025.
- For entities formed or organized on or after September 4, 2024 that had a filing deadline between December 3, 2024 and December 23, 2024: the filing deadline is now January 13, 2025.
- For entities formed or organized between December 3, 2024 and December 23, 2024: add twenty one (21) days to the initial filing deadline.
- For entities formed or organized on or after January 1, 2025: thirty (30) days from the date of formation or organization.

This law alert is only applicable to federal reporting obligations. Your company may still be subject to state reporting obligations, such as the New York LLC Transparency Act, which you can learn more about [here](#).

Please review our firm's previous Corporate Law Alerts for more information regarding the now reversed injunction, the stay, and the DOJ's appeal to the Fifth Circuit. RMF will continue to track developments in this matter and provide regular updates. If you have any questions or would like to discuss how this applies to your business, please contact:

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