



ENFORCEMENT OF CORPORATE TRANSPARENCY ACT SUSPENDED AGAIN

December 30, 2024

On December 26, a panel of the Fifth Circuit Court of Appeals considering the merits of the challenge to the Corporate Transparency Act (CTA) by Texas Top Cop Shop, Inc. vacated the stay of the injunction against enforcement of the CTA reporting deadlines entered by a motions panel of that Court on December 23. The Court of Appeals issued a briefing schedule on the appeal which concludes briefing on February 28, 2025. Oral arguments are scheduled for March 25, 2025.

Subject to further action by the Fifth Circuit Court of Appeals or the Supreme Court, the end result is that the injunction against enforcement of the CTA deadlines is reinstated.

FinCEN has again indicated that, as of December 26 in compliance with the court order, reporting entities are not required to file their beneficial ownership reports. FinCEN will continue to accept voluntary filings.

For prior client alerts with respect to the Corporate Transparency Act, please click on the links below.

[Corporate Transparency Act Injunction Lifted \(December 24, 2024\)](#)

[Injunction Against Enforcement of the Corporate Transparency Act \(December 4, 2024\)](#)

[Corporate Transparency Act and the New Federal Reporting Requirements \(September 20, 2024\)](#)