

PUBLICATION

Fifth Circuit Reinstates January 1 CTA Filing Deadline

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On December 23, in *Texas Top Cop Shop, Inc., et al. v. Garland, et al., Case No. 4:24-cv-478 (5th Cir.)*, the United States Court of Appeals for the Fifth Circuit stayed the nationwide injunction on the filing deadline of the beneficial ownership information reports (BOIR) with FinCEN for all non-exempt entities.

The Fifth Circuit did not impose a new filing deadline for the BOIR.

As of the date and time of publication of this alert, FinCEN has not issued an official statement regarding the case or any modification to the BOIR deadline. Therefore, all non-exempt reporting companies formed prior to January 1, 2024 must file their initial BOIR **by January 1, 2025**, the deadline originally imposed by FinCEN.

If you have questions or concerns regarding this alert, please reach out to [Jake Farrar](#), [Lucas Lopez](#), or any member of Baker Donelson's [Business and Corporate](#) team.