



# **UPDATE: Corporate Transparency Act Injunction Lifted; Beneficial Ownership Information Reporting Deadline Extended**

---

*By: Margaret Karakashian, Esquire*



On December 3, 2024, the U.S. District Court for the Eastern District of Texas in *Texas Top Cop Shop, Inc., et al. v. Garland et al.* granted a nationwide injunction enjoining the Federal Government from enforcing the Corporate Transparency Act ("CTA").

The Federal Government promptly appealed the lower court's decision and on December 23, 2024, the U.S. Court of Appeals lifted the injunction ordered by the lower court, pending the Federal Government's appeal. As a result, reporting companies must, at this time, resume with filing their Beneficial Ownership Information Reports ("BOIR") under the CTA.

The U.S. Department of the Treasury has extended the reporting deadline to file the initial BOIR as follows:

- Reporting companies that were created prior to January 1, 2024 have until **January 13, 2025** to file.
- Reporting companies created on or after September 4, 2024 that had a filing deadline between December 3, 2024 and December 23, 2024, have until **January 13, 2025** to file.
- Reporting companies created on or after December 3, 2024 and on or before December 23, 2024 have an additional 21 days from their original filing deadline to file.

- Reporting companies that qualify for disaster relief may have extended deadlines that fall beyond January 13, 2025. Please see our alert “**Beneficial Ownership Information Report Filing Deadline Extended Six-Months for Companies Impacted by Hurricane Milton**” to determine if you qualify, in which case the deadline that falls later applies.
- Reporting companies created on or after January 1, 2025, the deadline to file is 30 days after receiving actual or public notice that their creation is effective.

We recommend that reporting companies file their BOIRs in a timely manner to avoid penalties. Violations of the CTA, including the failure to file the BOIR may lead to civil or criminal penalties. Civil penalties can be up to \$500 for each day the violation continues.

Those needing assistance in this regard may contact us by email [info@henlaw.com](mailto:info@henlaw.com) or by phone at 239-344-1100 to schedule a consultation.

## About the Author



Margaret Karakashian, who is admitted to practice in both Florida and California, offers a range of legal services designed to safeguard and grow businesses. Her experience spans entity formation, contract negotiation, mergers and acquisitions, and ongoing corporate counsel. With her background as a tax accountant, she integrates tax-efficient strategies ensuring that clients are not only compliant with legal obligations but also operate in a financially efficient manner.