

PUBLICATION

Update: FinCEN Clarifies Deadlines for CTA Filings

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Shortly after the publication of our last client alert, "Fifth Circuit Reinstates January 1 CTA Filing Deadline" on December 23, 2024, FinCEN provided a statement and guidance regarding the Fifth Circuit's decision to stay the injunction by the District Court. The full statement can be found on FinCEN's website by [clicking here](#).

The main takeaway from the FinCEN alert is that reporting companies are required to file beneficial ownership information with FinCEN subject to certain extended deadlines (as described below):

1. Reporting companies that were created or registered prior to January 1, 2024, have until **January 13, 2025**, to file their initial beneficial ownership information reports with FinCEN.
2. Reporting companies created or registered in the United States 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 their initial beneficial ownership information reports with FinCEN.
3. Reporting companies created or registered in the United States 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 their initial beneficial ownership information reports with FinCEN. (For a total of 51 days from the date of formation, if formed between December 3, 2024, and December 23, 2024.)
4. Reporting companies that qualify for disaster relief may have extended deadlines that fall beyond **January 13, 2025**. These companies should abide by whichever deadline falls later.
5. Reporting companies that are created or registered in the United States on or after January 1, 2025, have 30 days to file their initial beneficial ownership information reports with FinCEN after receiving actual or public notice that their creation or registration is effective.

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.