

**December 30, 2024**

### **FULL FIFTH CIRCUIT COURT OF APPEALS REINSTATES NATIONWIDE PRELIMINARY INJUNCTION**

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In a surprise order on December 26, 2024, the full Fifth Circuit Court of Appeals vacated the stay of the nationwide preliminary injunction blocking enforcement of the Corporate Transparency Act (CTA). As a result, the Department of the Treasury and the Financial Crimes Enforcement Network (FinCEN) are again enjoined from enforcing the CTA against any reporting company and there is currently no obligation for companies to file a beneficial ownership interest report (BOIR) with FinCEN.

As evidenced by the many court orders issued recently, the future of the CTA remains uncertain. We continue to recommend clients gather beneficial ownership information now in order to be prepared to file a BOIR upon short notice.

*DISCLAIMER: This Alert is designed to keep you aware of recent developments in the law. It is not intended to be legal advice, which can only be given after the attorney understands the facts of a particular matter and the goals of the client.*

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