

# Corporate Transparency Act Blocked Again by the Fifth Circuit

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On December 26, 2024, three days after a Fifth Circuit panel lifted the nationwide preliminary injunction against enforcement of the Corporate Transparency Act (CTA), a different panel of the same court vacated the stay order and reinstated the injunction.

The court's decision to vacate its order again pauses enforcement of the CTA's reporting obligations until further decisions are issued. The court reinstated the injunction in order to "preserve the constitutional status quo while the merits panel considers the parties' weighty substantive arguments."

The Financial Crimes Enforcement Network (FinCEN) has posted the following alert on the webpage for its e-filing system:

*Please note that beneficial ownership information reporting requirements have been affected by a recent federal court order. The Department of the Treasury is appealing that order. In the meantime, reporting companies are not currently required to file a BOIR and are not subject to liability if they fail to do so while the applicable order remains in force. However, reporting companies may still opt to file a BOIR.*

For now, reporting companies may consider the new deadlines announced on Monday to be temporarily suspended. Given the ongoing uncertainty around the future of the CTA, business entities should remain prepared to file on short notice pending further developments in the courts or other branches of the government.

Please contact [Laura McKinney](#) or your relationship attorney to discuss the next steps for your reporting company.