

CTA Reporting Paused Once Again

December 27, 2024

As of yesterday evening, it appears beneficial ownership reporting obligations under the Corporate Transparency Act and its implementing regulations (together, the “CTA”) are again on pause.

On December 26, 2024, the U.S. Court of Appeals for the Fifth Circuit issued an [order](#) in *Texas Top Cop Shop, Inc. v. Garland* vacating the December 23, 2024, order of the court’s motions panel that had reinstated CTA reporting obligations. This latest decision means the December 3, 2024, preliminary injunction enjoining enforcement of the CTA is back in effect. We expect the U.S. Treasury Department’s Financial Crimes Enforcement Network to update its website to reflect this development and to indicate again that reporting companies are not obligated to (but may voluntarily) report beneficial ownership information while the preliminary injunction remains in effect. Firms should continue to monitor developments closely.

Our most recent client update on the *Texas Top Cop Shop* litigation is available [here](#).

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Please do not hesitate to contact us with any questions.



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