



CORPORATE TRANSPARENCY ACT

NATIONWIDE INJUNCTION

Dear Colleagues and Friends,

In summary:

- Prior to December 3, 2024, the CTA required all existing Reporting Companies to file beneficial ownership-related information reports by January 1, 2025;
- On December 3, 2024, a federal court granted a nation-wide injunction against the enforcement of the CTA;
- Currently, reporting companies need not comply with January 1, 2025 deadline;
- If you have not yet filed the reports, you can 1) proceed with filing or 2) postpone filing and wait and see what happens with the law;
- If you would like to proceed with filing and need assistance, we have organized with one of our long-standing relationships that we regularly do business with, namely Jane Ozuna, who has agreed for our clients, she can prepare the beneficial ownership-related information reports for \$60/form; and
- If you would like us to help coordinate a meeting with Jane Ozuna, please contact Laura Bolanos or Anja Nickolenko by calling (858) 200-1900 or emailing wsg@strazzerimancini.com.

CTA Overview

The Corporate Transparency Act (“CTA”) is a federal law requiring “Reporting Companies” to file certain beneficial ownership-related information reports (BOIR) with the U.S. Department of Treasury’s Financial Crimes Enforcement Network (“FinCEN”). The CTA is part of the Bank Secrecy Act and is an expansion of anti-money laundering laws that requires both existing and new entities in the US to file reports with FinCEN regarding entity ownership and control. The CTA required existing entities to file their initial beneficial ownership report by January 1, 2025.

We are not experts in the CTA. However, [click here](#) for a document containing some general information regarding what entities are considered a Reporting Company, who is considered a Beneficial Owner, and the information required to be filed and reported to FinCEN.

Injunction Against Enforcement of CTA

As predicted by our firm, on December 3, 2024, a Federal District Court in the Eastern District of Texas granted a nation-wide injunction against the enforcement of the CTA, including the enforcement of the Reporting Rule 31 C.F.R. 1010.380 (BOIR) on the basis that it is a constitutional overreach on behalf of

Congress. As such, without further order of the Court, Reporting Companies need not comply with the CTA's current beneficial ownership-related information report deadline of January 1, 2025.

Options

- If you have already filed the BOIR, this is not a problem, and no further action is needed from you.
- If you have not filed the BOIR, in an abundance of caution, you may still want to file, as the CTA may eventually be upheld.
 - If you would like to proceed to file and need assistance, please let us know. Despite these uncertain times, we strive to be there for you and your family. As such, we have organized with one of our long-standing relationships that we regularly do business with, namely Jane Ozuna, who has agreed for our clients (if we provide the data), she can prepare the Beneficial Ownership-Related Information Report for \$60/form in compliance with the rules of the CTA in its current form. Jane Ozuna has done the work for Strazzeri Mancini, LLP as well as Joe Strazzeri's and Steve Mancini's separate entities. Laura Bolanos and Anja Nickolenko would be happy to receive your email or call to coordinate with Jane Ozuna (see their information above).
- In the alternative, you can postpone filing at this time, and wait and see how further court action or the new administration will impact the CTA in its current form.

We will continue to monitor this law closely and provide you updates.

Sincerely,

Victoria E. Ralis

Attorney & Counselor at Law, CPA