CHOATE

Update Memo: Corporate Transparency Act

DATE: March 3, 2025

TO: Clients & Friends

FROM: Choate, Hall & Stewart LLP

RE: Corporate Transparency Act Suspended for US Citizens and Companies

On Sunday night, March 2, 2025, the US Treasury Department issued a press release suspending enforcement of the Corporate Transparency Act for US citizens and companies. It stated as follows:

Treasury Department Announces Suspension of Enforcement of Corporate Transparency Act Against U.S. Citizens and Domestic Reporting Companies

March 2, 2025

The Treasury Department is announcing today that, with respect to the Corporate Transparency Act, not only will it not enforce any penalties or fines associated with the beneficial ownership information reporting rule under the existing regulatory deadlines, but it will further not enforce any penalties or fines against U.S. citizens or domestic reporting companies or their beneficial owners after the forthcoming rule changes take effect either. The Treasury Department will further be issuing a proposed rulemaking that will narrow the scope of the rule to foreign reporting companies only. Treasury takes this step in the interest of supporting hard-working American taxpayers and small businesses and ensuring that the rule is appropriately tailored to advance the public interest.

Treasury's March 2 announcement is sweeping, but it is possible there could be further developments.

You can check for FinCEN updates at <u>fincen.gov/boi</u>.

Please reach out to your regular contact at Choate if you have questions.