

BUSINESS AND TRANSACTIONS

INFORMATION MEMO

MARCH 4, 2025

FinCEN Suspends Enforcement of the Corporate Transparency Act Against U.S. Citizens and Domestic Reporting Companies

On March 2, 2025, the U.S. Treasury Department announced that it will no longer be enforcing any penalties or fines against U.S. citizens, domestic reporting companies or their beneficial owners with respect to the Corporate Transparency Act (the CTA). The press release further stated that the Treasury Department will be issuing a proposed rulemaking that will narrow the scope of the rule to apply to only foreign reporting companies.

The Financial Crimes Enforcement Network (FinCEN) had previously announced, on Feb. 27, 2025, that it was temporarily pausing the enforcement of CTA against all reporting companies until it had issued an “interim final rule.” The Feb. 27, 2025 press release further stated that the “interim final rule,” which FinCEN intended to issue prior to the current March 21, 2025 deadline, would further extend the beneficial ownership information (BOI) reporting deadlines, and that FinCEN would be soliciting public comments with respect to further potential revisions to the existing BOI reporting requirements, which would be considered by FinCEN “as part of a notice of proposed rulemaking anticipated to be issued later this year to minimize burden on small businesses while ensuring that BOI is highly useful to important national security, intelligence, and law enforcement activities, as well to determine what, if any, modifications to the deadlines . . . should be considered.”

The March 2, 2025 notice, however, states that FinCEN will not only suspend enforcement against U.S. citizens, domestic reporting companies and their beneficial owners, but that FinCEN will eventually modify the CTA so that it applies only to foreign reporting companies.

Accordingly, as of the date of this information memo, FinCen has announced that:

1. it will no longer enforce any penalties or fines against U.S. citizens, domestic reporting companies or their beneficial owners;
2. enforcement of the CTA against foreign reporting companies will remain paused until the “interim final rule” has been issued; and
3. it will be issuing a proposed rulemaking that will narrow the scope of the CTA so that it will apply only to foreign reporting companies.

Read the full press releases here: [Feb. 27, 2025 Press Release](#); and [March 2, 2025 Press Release](#)

Attorneys at Bond continue to monitor the ongoing developments of the CTA and remain available to answer any questions that you may have.

We encourage you to contact an attorney in Bond’s business and transactions practice or the Bond attorney with whom you are regularly in contact to determine how the CTA impacts your business.

