

# Legal Commentary

March 3, 2025

## CTA Update: FinCEN to Delay Enforcement of BOI Reporting Deadlines

**Author: Mike Chiang of Han Kun LLP**

### Summary

The Financial Crimes Enforcement Network (FinCEN) announced on February 27, 2025 that no fines, penalties, or enforcement actions will be issued against companies for failing to file or update Beneficial Ownership Information (BOI) reports under the Corporate Transparency Act (CTA) until new deadlines are established. This decision aligns with the U.S. Department of the Treasury's commitment to reducing regulatory burdens and ensuring that BOI reporting focuses on high-risk entities that pose significant national security or law enforcement risks.

### Key Announcements

- **No Fines or Enforcement Actions:** Companies that miss BOI filing deadlines will not face penalties or enforcement actions until new deadlines are set in an upcoming interim final rule.
- **New Deadlines Expected:** By March 21, 2025, FinCEN intends to issue an interim final rule extending BOI reporting deadlines and providing additional guidance.
- **Public Comment Period:** FinCEN will seek public input on potential revisions to BOI reporting requirements to reduce compliance burdens on small businesses while maintaining national security and law enforcement priorities.

### What This Means for Businesses

1. **No Immediate BOI Filing Requirements:** Companies can delay filing until FinCEN finalizes new deadlines in the forthcoming interim final rule.
2. **Upcoming Rule Changes:** FinCEN is expected to introduce modifications to reporting requirements, particularly for small businesses.
3. **Monitor FinCEN Announcements:** Companies should stay informed about the interim final rule and future regulatory changes.

## Next Steps

- **Await FinCEN's Interim Final Rule:** Expected by March 21, 2025, this rule will set new BOI reporting deadlines.
- **Prepare for Possible Filing Adjustments:** Businesses should monitor FinCEN's rulemaking process and be ready to comply with updated BOI requirements.
- **Participate in Public Comment Process:** FinCEN will solicit feedback from stakeholders on potential revisions to BOI reporting rules.

## **Important Announcement**

This Legal Commentary has been prepared for clients and professional associates of Han Kun Law Offices. Whilst every effort has been made to ensure accuracy, no responsibility can be accepted for errors and omissions, however caused. The information contained in this publication should not be relied on as legal advice and should not be regarded as a substitute for detailed advice in individual cases.

If you have any questions regarding this publication, please contact:

**Mike Chiang**

**Han Kun LLP**

620 Fifth Avenue, 2<sup>nd</sup> Floor, Rockefeller Center, New York, NY 10020, USA

T: +1 646 849 2888

M: +1 415 269 5589

Email: [mike.chiang@hankunlaw.com](mailto:mike.chiang@hankunlaw.com)