

Publisher: Day Pitney Alert
January 28, 2025

Despite SCOTUS Lifting Injunction, Corporate Transparency Act Reporting Remains Suspended

The Corporate Transparency Act (CTA) remains subject to a nationwide injunction despite a decision on January 23 by the U.S. Supreme Court to stay another nationwide injunction. The Financial Crimes Enforcement Network, the federal agency charged with administration of the CTA, has confirmed on its website that reporting companies are not subject to liability while a second injunction remains in effect, but it also reiterated that it would continue to accept submissions of beneficial ownership information reports on a voluntary basis.

The injunction stayed by the Supreme Court was originally issued by a Texas district court in the [Texas Top Cop Shop case](#). However, a second nationwide injunction against enforcement of the CTA was recently issued, on January 7, 2025, by yet another Texas district court in a case called *Smith v. U.S. Department of the Treasury*. It is the injunction in the *Smith* case that has the CTA currently frozen. We will continue to report on any further developments.

Authors



R. Scott Beach

Partner

Greenwich, CT | (203) 862-7824

Stamford, CT | (203) 977-7336

rsbeach@daypitney.com



Lane T. Watson

Partner

Hartford, CT | (860) 275-0355

ltwatson@daypitney.com



Amy R. Lonergan

Partner

Boston, MA | (617) 345-4613

alonergan@daypitney.com



B. Dane Dudley

Partner

West Hartford, CT | (860) 313-5752

bddudley@daypitney.com



Darren M. Wallace

Partner

Stamford, CT | (203) 862-7874

Greenwich, CT | (203) 862-7800

dmwallace@daypitney.com