

Service

Corporate
Transparency Act
(CTA)

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Proposed Continuing Resolution May Extend Deadline for Certain CTA Reporting Companies

Key takeaway

Congress is considering a Continuing Resolution that, if passed, would extend the reporting deadline for certain reporting companies under the Corporate Transparency Act (CTA) from January 1, 2025, to January 1, 2026.

FY25 Continuing Resolution

The FY25 Continuing Resolution (H.R. 10445) was introduced by Rep. Tom Cole, the chairman of the House Appropriations Committee. This legislation, which will fund the federal government through March 14, 2025, contains a provision to extend the reporting deadline under the CTA from January 1, 2025, to January 1, 2026, for reporting companies that were formed/registered before January 1, 2024 only. Reporting companies that were formed/registered on or after January 1, 2024, must still report within 90 days, which deadline will change to just 30 days beginning on January 1, 2025 (subject to the preliminary injunction, discussed below).

In light of very strong opposition to the FY25 Continuing Resolution which continues to materialize, it may be likely that the current Continuing Resolution legislation is pulled and a different approach is pursued. It is unclear as to whether this potential new Continuing Resolution approach would include the extension of the reporting deadline under the CTA. It is important to note that the current Continuing Resolution for the federal government expires on December 20, 2024.

Separate from the FY25 Continuing Resolution, the CTA is also currently subject to a national preliminary injunction issued by the United States

District Court for the Eastern District of Texas, which preliminary injunction is currently being appealed. For more information, please visit our [article here](#).

Contact us

If you have questions regarding compliance with the CTA or the FY25 Continuing Resolution, please contact Yuefan Wang, Kyle Gilster, Emily Loftis, or your Husch Blackwell attorney.