

FinCEN Confirms New CTA Filing Deadline - But Congress Looks to Push Deadlines For Some Reporting Entities to 2026

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by Erin Bryan, Nathan Honson, Joseph Lynyak, and Matthew Dickerson

The Dorsey Health Law blog team keeps readers up-to-date on relevant topics in the health care industry. In order to do so, the members of the blog team communicate regularly with other practice groups within the firm for applicable updates from client publications. For this post, we would like to thank Dorsey's Erin Bryan, Nathan Honson, Joseph Lynyak, and Matthew Dickerson for the following e-newsletter update:

On February 18, 2025, in a widely expected decision, the Eastern District of Texas, in the case of *Smith v. United States Dep't of the Treasury*, 2025 WL 41924 (*E.D. Tex.*), and following [the decision](#) of the U.S. Supreme Court on January 23, 2025, granted the U.S. Government's request to stay the nationwide temporary injunction CTA").

In keeping with a prior notification, on February 19, 2025, FinCEN confirmed that it has extended the general reporting deadline for reporting companies to **March 21, 2025**. This means, as of now, for the vast majority of entities formed in the U.S., or registered to do business in the U.S., they must file an initial, updated and/or corrected beneficial ownership report on or before that date, unless they are exempt.

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