

MEMORANDUM TO CLIENTS AND FRIENDS

FROM JEANETTE M. LOMBARDI

FEBRUARY 5, 2024

The Corporate Transparency Act

Dear Clients and Friends,

I hope your 2024 is off to a good start! I wanted to reach out and let you know a bit about the Corporate Transparency Act (CTA), which became effective as of Jan. 1, 2024. This new federal legislation might not affect you at all, if you do not have an interest in a business entity.

The CTA requires many companies in the United States report information about their beneficial owners, to the Financial Crimes Enforcement Network (FinCEN). FinCEN is a bureau within the U.S. Department of the Treasury.

Under the CTA, both existing and newly formed entities will (subject to certain exceptions) be required to file certain information pertaining to the company, its beneficial owners and, for newly formed entities only, its applicants. Failure to timely comply with the reporting obligations could result in both civil and criminal penalties. Filing deadlines are as follows:

- entities formed prior to Jan. 1, 2024, must file their report no later than Jan. 1, 2025;
- entities formed during the calendar year 2024 must file their report within 90 days of formation;
- entities formed on or after Jan. 1, 2025, must file their report within 30 days of formation.

If you do have an interest in an entity, we recommend that you review the various materials available on the following websites to familiarize yourself with the compliance requirements:

FinCen's website located at: <https://www.fincen.gov/boi>

Frequently asked questions at: <https://www.fincen.gov/boi-faqs>

Please do not hesitate to contact me with any questions or concerns. Wishing you a Happy and Healthy 2024!



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