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Client Alert: Corporate Transparency Act for Foreign Reporting Companies Only

BY JULIE K. O'NEILL • MARCH 24, 2025

On Friday, March 21, 2025, the Financial Crimes Enforcement Network (FinCEN) issued an interim final rule that eliminates reporting requirements for domestic reporting companies via redefining “reporting company” to include only those entities formed under the law of a foreign country and that have registered to do business in any U.S. State or Tribal jurisdiction by filing a document with a secretary of state or similar office.

Per the issued interim final rule, foreign entities that fall within the revised definition and do not qualify for any of the exemptions will need to file beneficial ownership information for required persons. However, a foreign entity that meets this new definition will not need to report any beneficial owner who is a U.S. person.

FinCEN is accepting comments on this issued rule for 60 days from its release and intends to issue a final rule sometime this year.

Employers and companies with questions about how to comply with the CTA should consult their [Bowditch attorney](#). We will assume you are handling these matters on your own unless you request assistance from your Bowditch attorney in writing.