

December 5, 2024

VIA EMAIL

To Our Investment Adviser Clients and Other Friends:

Re: Corporate Transparency Act - Nationwide Preliminary Injunction.

On December 3, 2024, a federal district court in Texas issued a nationwide preliminary injunction preventing the U.S. government from enforcing the upcoming compliance deadline to submit Beneficial Ownership Information reports ("<u>BOIRs</u>") under the Corporate Transparency Act. As a result, all reporting entities are currently not required to file BOIRs, including those reporting entities that had a deadline to file before January 1, 2025. The preliminary injunction is not a final ruling in the case; the court could later lift the injunction and BOIRs would again be required. For reporting entities that have already submitted their BOIRs, there is nothing to be done at this time. If you have not yet filed your BOIRs, you may choose to defer filing. If you defer filing, however, we recommend that you remain prepared to file BOIRs for reporting entities if the injunction is lifted.

Please contact one of the Shartsis Friese attorneys in the <u>Investment Funds & Advisers Group</u> if you have questions about your reporting obligations in light of this preliminary injunction.

Previous letters to our investment advisory clients and friends and discussions of other topics relevant to private fund managers, investment advisers and private investment funds can be found at our insights page: www.sflaw.com/blog/investment-funds-advisers-insights.

SHARTSIS FRIESE LLP