Verrill

Filing a BOI Report Online: A Step-by-Step Guide

Please note that this guide is intended to assist only in the technical process of completing online beneficial ownership information reports. If you have legal questions regarding the Corporate Transparency Act or reporting obligations thereunder, please contact your Verrill attorney.

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The U.S. Department of the Treasury's Financial Crimes Enforcement Network ("FinCEN") has developed several filing mechanisms by which entities can submit Beneficial Ownership Information ("BOI") reports, as required by the federal Corporate Transparency Act ("CTA"). These include submitting reports by filing a PDF or completing and submitting reports online. We generally recommend the online filing option but have found that some people find the online form difficult. We, therefore, have developed this guide to assist clients with the technical process of completing BOI reports. If you have any questions about the content of your BOI report(s), we encourage you to review the resources provided on our CTA Resource Page or to reach out to a Verrill attorney.

Filing a BOI report is free. If you are asked to pay in order to complete the filing, you might be dealing with a third-party filing service. You are free to use a reputable paid third-party service should you choose, but it is not required, and if you do not intend to do so, please see the information in the "Securely Accessing the Report and General Tips for the Filing System" section of this guide to ensure that you are accessing the correct filing system.

Many individuals can complete their BOI reports in less than an hour. This comprehensive guide aims to help filers with varying computer skills and experience.

Before You Begin

The person completing the BOI report ("Filer") on behalf of a non-exempt entity ("Entity") should be a person authorized by the Entity to complete the report, which may include an owner or employee of the Entity.

BOI reports require significant confidential information; therefore, the Filer should plan to file the report from a secure computer on a trusted network in a secure location.

Preparation

Before accessing the CTA filing system, the Filer should determine who will be listed on the report as a Beneficial Owner of the Entity. You can read more about Beneficial Owners <u>here</u>. If you have questions about who should be listed as a Beneficial Owner, you should contact the Entity's Verrill attorney.

For each person who will be listed as a Beneficial Owner, the Filer should collect the following information:

- Legal name
- Date of birth
- Residential address

In addition to the above, from each Beneficial Owner, the Filer should collect a clear picture or scan of an identifying document. This can include a passport; a state-issued driver's license; or a state, local, or tribe-issued identification. The Filer also will have to enter the below information into the report, so the scan or picture of the identifying document should be sufficiently legible that the Filer can input the following accurately for each Beneficial Owner:

- Identifying document type
- Identifying document number
- Identifying document issuing jurisdiction

To simplify the filing process, we recommend that the Filer securely save these identifying documents to the secure, private computer from which the Filer will file the report.

Entities formed after January 1, 2024, also are required to report "Company Applicants" in addition to Beneficial Owners. You should work with the Entity's Verrill attorney to determine who should be listed as a Company Applicant and collect the above information from each Company Applicant.

Some Beneficial Owners or Company Applicants may request a FinCEN ID instead of providing the above information. For Beneficial Owners or Company Applicants with a FinCEN ID, the Filer only needs to collect the 12-digit number. For entities, this number typically begins with a "2," and for individuals, it usually starts with a "3."

Securely Accessing the Report and General Tips for the Filing System

The official, free online BOI report filing system is accessible at this <u>link</u>. Before entering any confidential information, the Filer should confirm that the computer has a secure connection to the Internet. This can be done by clicking the website address in the address bar at the top of the browser—if the URL is preceded by "https://," the connection should

be secure. To help avoid inadvertently engaging a paid third-party website, or worse, the Filer also should confirm that the website address includes ".gov" and not ".com," ".net," ".edu," or another top-level domain.

Once the Filer has navigated onto the online filing system, the below pop-up should appear:

An official website of the United States go FINANCIAL CR ENFORCEMENT	An official website of the United States government. Here's how you know ~ FINANCIAL CRIMES ENFORCEMENT NETWORK				
BOIE-FILING FILEBOIR	WARNING: You are entering a U.S. Government information system maintained, administered, and operated by the U.S. Department of the Treasury. This information system may only be used for authorized purposes. The U.S. Government may monitor, record, and audit all activity on this information system. By accessing and using this system, users are consenting to U.S. Government monitoring, recording, and auditing of their activity on this information system.				
	U.S. Dept. Of Treasury FinCEN.gov Privacy Policy Accessibility				

If the Filer agrees with the pop-up, the Filer should click the blue "I Agree" button.

The below screen should then appear:

FINANCIA ENFORCE	AL CRIMES MENT NETWORK					
BOI E-FILING FILE BO	DIR HELP					
Beneficial Ow	nership Infor	mation Report	(BOIR)			
OMB No. 1506-0076						
Complete the report in its entirety with all required information. Fields marked with an asterisk (*) symbol are the fields that, <i>at a minimum</i> , must be completed by all companies to file the report. Reporting companies, however, must include all information 31 CFR 1010.380(b) requires them to provide, regardless of whether a field is marked with an asterisk (*) symbol. These information requirements are summarized above under HELP.						
Filing Information	Reporting Company	Company Applicant(s)	Beneficial Owner(s)	Submit		
Filing Information	n					
⑦ Need help?				~		
*1. Type of filing:						
🔘 a. Initial report						

At the top of each report page, the Filer should confirm that the gray bar below contains an American flag and that the text "An official website of the United States government" is present. This is intended to help verify that the page is an official government website.

*	0	BOI E-FI	UNG	× +
÷	\rightarrow	C	ଇ	to boiefiling.fincen.gov/boir/html
				An official website of the United States government Here's how you know ~

Each of the following steps will address one of the sections of the report: Filing Information, Reporting Company, Company Applicant(s), Beneficial Owner(s), and Submit. The Filer can move back and forth between the sections easily without losing information already entered but cannot submit the report until all required information (marked with a red asterisk) in each section is complete. To move between sections, the Filer can use either the "Next" and "Previous" buttons on the bottom of the screen (which are generally blue if there is a section before or after the current section) or click the gray box containing the section title at the top of the page.

The online filing system does not offer the option to save a report in progress, so we recommend completing the report in one session.

If a Filer has questions about a particular question, the Filer can click the nearest gray "Need help?" bar above the question, which provides additional information. If still confused, you should contact the Entity's Verrill attorney for more information.

⑦ Need help?

If a red box surrounds a question after the Filer clicks away from it, the Filer has likely entered incorrect information for that question. The reason for rejection will be displayed in red font under the question.

*8. Tax Identification number					
11111					
Tax ID must be exactly 9 characters					

Section One: Filing Information

The Filing Information Section requests the following information:

Filing Information	Reporting Company	Company Applicant(s)	Beneficial Owner(s)	Submit
Filing Information				
⑦ Need help?				~
 *1. Type of filing: a. Initial report b. Correct prior report c. Update prior report d. Newly exempt entity 				
2. Date prepared (auto-filled)				
10/10/2024				
Previous				Next

In Question 1, if an entity is completing its first report, the Filer should select option "a. Initial Report." Option "b. Correct prior report" is for Filers who are correcting a mistake in a previously filed BOI report, while option "c. Update prior report" should be used when there has been a change in the reported information that requires an updated report. Option "d. Newly exempt entity" should be used if an entity qualifies for one of the exemptions under the CTA. You can find more information about the obligation to update BOI reports below.

The date for Question 2 automatically will reflect the current date and cannot be changed by the Filer.

To move to the next section, the Filer can click the blue "Next" button at the bottom of the screen.

Section Two: Reporting Company

The first two questions of this Section (Questions 3 and 4) pose difficulty for many Filers. For Question 3, some entities may request a FinCEN ID to make filing BOI reports for related companies easier. If you have questions about whether this is a good option for your Entity, or if you are unsure if the Entity is a "foreign pooled investment vehicle," as requested by Question 4, you should again consult the Entity's Verrill attorney.

Legal name and alternate name(s)	
⑦ Need help?	~
*5. Reporting Company legal name	
6. Alternate name (e.g. trade name, DBA)	
Add Alternate Name	

For Questions 5 and 6, the Filer should enter the information exactly as it appears on the Entity's organizational documents. If unsure, the Filer may be able to confirm the Entity's legal and alternative names on an online search function offered by the Secretary of State of the Entity's state of formation.

If the Entity has multiple alternate names, the Filer should click the blue "Add Alternate Name" button to add additional alternate names rather than listing all alternate names in one line.

Filing Information	Reporting Company	Company Applicant(s)	Beneficial Owner(s)	Submit
6. Alternate name (e.g. trad	de name, DBA)			
		Remove		
6. Alternate name (e.g. trad	de name, DBA)			
		Remove		
6. Alternate name (e.g. trac	de name DBA)		-	
	de name, bbAy	Remove		
Add Alternate Name				

If the Filer accidentally adds more "Alternate Name" lines than there are alternate names, the Filer should click the blue "Remove" button to remove the extra lines instead of leaving the lines blank, which may cause the filing system to reject the report.

Filing Information	Reporting Company	Company Applicant(s)	Beneficial Owner(s)	Submit
Form of identification				
⑦ Need help?				~
7. Tax Identification type				
Select an ID type			~	
EIN			*	
SSN/ITIN				
Foreign				
9. Country/Jurisdiction (if for	eign tax ID only)			
Select a country			\sim	

Question 7 asks the Filer to select a tax identification type from a drop-down list. For most entities, "EIN" (which stands for Employer Identification Number, the federal taxpayer identification number) will be the correct option in Question 7. If the Entity has a U.S. bank account, it likely has an EIN.

Filing Information Re	porting Company	Company Applicant(s)	Beneficial Owner(s)	Submit
Form of identification				
⑦ Need help?				~
*7. Tax Identification type				
Select an ID type			\sim	
*8. Tax Identification number				
9. Country/Jurisdiction (if foreign t	ax ID only)			
Select a country			\sim	

In Question 8, the Filer should enter the tax identification number. If an incorrect number of digits is entered (any number other than nine for both EIN and SSN/ITIN), when the Filer clicks away from Question 8, a red box will appear around the question.

Question 9 will be grayed out, and the Filer cannot enter any information unless the answer to Question 7 is Foreign.

Filing Information	Reporting Company	Company Applicant(s)	Beneficial Owner(s)	Submit
Jurisdiction of formatio	n or first registration			
⑦ Need help?				~
*10. a. Country/Jurisdiction	of formation			
Select a country		\checkmark		

On Question 10, the Filer should select the Entity's country or jurisdiction of formation from the drop-down list. For most entities, this will be the United States of America; therefore, this country appears first in the list, which is otherwise alphabetical.

Filing Information	Reporting Company	Company	Applicant(s)	Beneficial Owner(s)	Sub	mit
Jurisdiction of formati	on or first registration					
⑦ Need help?						~
*10. a. Country/Jurisdictio	n of formation					
United States of America		$\times \mid \mathbf{v}$				
Domestic Reporting Com	pany					
b. State of formation						
Select a state		~				
c. Tribal jurisdiction of form	ation		d. Name of	the other Tribe		
Select a local/tribal		\sim				

Additional questions will appear if "United States of America" is selected from the dropdown list in Question 10. If the Entity was organized in a state, the Filer should select that state from the alphabetical drop-down list in Box B. Similarly, if the Entity was organized in tribal jurisdiction, the Filer should select the appropriate tribe from the alphabetical dropdown list in Box C.

Filing Information	Reporting Con	npany Company App	olicant(s) Ben	eficial Owner(s)	Submit
Current U.S. address					
⑦ Need help?					~
*11. Address (number, stree	t, and apt. or su	ite no.)		*12. City	
*13. U.S. or U.S. Territory		*14. State		*15. ZIP code	
Select a country	~	Select a state	~		
Previous					Next

The final questions of this section ask for the Entity's current U.S. street address. The Filer should enter the Entity's principal place of business if it is in the United States. If not, the Filer should enter the primary location where the Entity conducts business in the United States.

Once all the questions in this section are completed, the Filer should click the blue "Next" button to move to the next section.

Section Three: Company Applicant(s)



The above screenshot shows two of the most common pitfalls in the online filing system.

The first trap is in the checkbox next to Question 16. The Filer should check the checkbox next to Question 16 *only* if the Entity was formed before January 1, 2024. If the Entity was formed on or after January 1, 2024, the checkbox should not be checked.

If the checkbox in Question 16 is selected, the remainder of this section will be grayed out, as entities existing before January 1, 2024, are not obligated to report Company Applicant information. The Filer can proceed to the next section.

For entities required to report Company Applicant information, the second pitfall is in the "Add Company Applicant" button, which counterintuitively appears at the top of the page. If the entity has multiple company applicants to report, the Filer should click this button to add the required number of Company Applicants and then provide the necessary details about each. The Filer can navigate between Company Applicants by clicking on the gray bar above each. **The maximum number of Company Applicants that can be reported is two.** Please note that the form will allow the Filer to add more than two Company Applicants, but no more than two should be listed.

Filing Information Reporting Company	Company Applicant(s)	Beneficial Owner(s)	Submit
Part II. Company Applicant Inform	nation	Add	I Company Applicant
⑦ Need help?			~
Company Applicant #1			~
Company Applicant #2			~
Company Applicant #3			^
Remove company applicant #3			
Company applicant FinCEN ID			
⑦ Need help?			~
18. FinCEN ID			

The report will be rejected if any required information about a Company Applicant is blank. Therefore, the Filer should only add as many Company Applicants as necessary to accurately report the Entity's information. If the Filer has accidentally added too many Company Applicant boxes, the Filer should click the "Remove company applicant #" button above the extra Company Applicant. The Filer should ensure that the box being removed is blank to avoid inadvertently deleting the information of a valid Company Applicant.

When inputting information about a Company Applicant, the Filer should ensure that the Filer is entering the information for the appropriate Company Applicant profile.

Now, the Filer can enter Company Applicant information. If there are multiple Company Applicants, it does not matter in what order their information is presented (so, it does not matter who is Company Applicant #1 or #2) as long as the information for all Company Applicants is appropriately reported. If you have questions about who should be listed as a Company Applicant, please contact the Entity's Verrill attorney.

Filing Information	Reporting Company	Company Applicant(s)	Beneficial Owner(s)	Submit
Part II. Company	Applicant Information	tion	Ad	d Company Applicant
⑦ Need help?				~
Company Applicant #	1			^
Company applicar	nt FinCEN ID			
⑦ Need help?				~
18. FinCEN ID				

As discussed above, some Company Applicants may have FinCEN IDs. If so, the Filer should enter the FinCEN ID in Question 18. After doing so, if the Filer clicks elsewhere on the page, the other questions relating to this Company Applicant should disappear, as that information is not required if a Company Applicant has a FinCEN ID.

Filing Information	Reporting Company	Company Applicant(s)	Beneficial Owner(s)	Submit
Part II. Company A	pplicant Informat	tion	Add	d Company Applicant
⑦ Need help?				~
Company Applicant #1				^
Company applicant	FinCEN ID			
⑦ Need help?				~
18. FinCEN ID				
Previous				Next

The Filer can then use the blue "Add Company Applicant" button if the Entity has additional Company Applicants to report; otherwise, the Filer can use the blue "Next" button to move to the next section.

If the Company Applicant does not have a FinCEN ID, the Filer should leave Question 18 blank. If Question 18 is blank, the following questions will be available for the Filer to complete.

Filing Information Repo	orting Company	Company Applicant(s)	Beneficial Owner(s)	Submit
Legal name and date of bi	irth			
⑦ Need help?				~
*19. Individual's last name		*20. First n	ame	
21. Middle name	22. Suffi	x	*23. Date of birth	
			MM/DD/YYYY	

Questions 19-23 ask for specific demographic details about the Company Applicant. Question 19 asks for the last name of the Company Applicant, while Question 20 asks for the first name. Only Questions 19, 20, and 23 are required (as denoted by the red asterisk), but the information in this section should accurately reflect the identifying document of the Company Applicant. Therefore, if the identifying document contains a middle name and/or suffix, this information should be included in the appropriate boxes.

Filing Information	Reporting Compa	ny Company App	licant(s)	Beneficial Owner(s)	Submit
Current address					
⑦ Need help?					~
*24. Address type O Business Address	Residential Ad	dress			
*24. Address type Business Address *25. Address (number, stre	Residential Ad eet, and apt. or su	dress ite no.)		*26. City	
*24. Address type Business Address *25. Address (number, stre	Residential Ad eet, and apt. or su	dress ite no.)		*26. City	
*24. Address type Business Address *25. Address (number, stre *27. Country/Jurisdiction	Residential Ad	dress ite no.) *28. State		*26. City *29. ZIP/Foreign po	stal code

Questions 24-29 ask for the Company Applicant's address information. If the Company Applicant formed or registered the Entity in the course of the Company Applicant's business (for example, a paralegal or attorney), the Filer should select "Business Address" in Question 24 and enter the Company Applicant's business address. Otherwise, the Filer should select "Residential Address" for Question 24 and enter the Company Applicant's residential address.

	letton		
⑦ Need help?			~
*30. Identifying document type		*31. Identifying document number	
Select an ID type	~		
*32. Identifying document issuing jurisdiction			
a. Country/Jurisdiction		b. State	
Select a country/jurisdiction	~	Select a state	~
c. Local/Tribal		d. Other local/Tribal description	
Select a local/tribal	~		
*33. Identifying document image			
Drag file here or choose from folder			

Questions 30-33 of this Section require the Filer to provide information about the Company Applicant's identifying document. From the drop-down list in Question 30, the Filer should select the appropriate document type. Depending on the document type selected in Question 30, parts of Question 32 may be grayed out. For example, if "U.S. passport" is selected in Question 30, Question 32 is grayed out, and the Filer can move to Question 33.

Form of identificat	tion and issuing jurisd	iction			
⑦ Need help?					~
*30. Identifying docum	ient type		*31. Identif	ying document number	
U.S. passport		× v			
*32. Identifying docum	ent issuing jurisdiction				
a. Country/Jurisdiction			b. State		
United States of Amer	rica	$\times $	Select a st	ate	~
c. Local/Tribal			d. Other loca	al/Tribal description	
Select a local/tribal		~			
*33. Identifying docum	ient image				
Drag file	here or <u>choose from folder</u>				

The image uploaded in Question 33 should be smaller than four megabytes (4MB) of data and in one of the following formats: JPG/JPEG, PNG, or PDF. The Filer can upload only one file per Company Applicant.

*30. Identifying docum	nent type		*31. Identifying document number	
Select an ID type		~		
c. Local/Tribal	saiction	~	d. Other local/Tribal description	~
Select a local/tribal				

If the Filer accidentally uploads an incorrect file, the Filer can click the "Remove" button below Question 33 to remove the file. This button will not remove the Company Applicant.

If the Filer has completed all the information for the required Company Applicants, the Filer can click the blue "Next" button to go on to the next section. Otherwise, the Filer should follow the steps above to add more Company Applicants and provide their required information.

Section Four: Beneficial Owner(s)

You can find information regarding who should be reported as a Beneficial Owner <u>here</u>. Contact the Entity's Verrill attorney if you are unsure who to list as a Beneficial Owner. Unlike Company Applicants, there is no maximum number of Beneficial Owners that can be reported.



As with the "Company Applicant(s)" section discussed in Step Five, the "Beneficial Owner(s)" section requires the Filer to use the blue "Add Beneficial Owner" button at the

top of the page to add the correct number of Beneficial Owners. The Filer can navigate between Beneficial Owners by clicking the gray bar above each Beneficial Owner and should remove any extra Beneficial Owner spaces by clicking the blue "Remove Beneficial Owner #" button. When removing an unnecessary Beneficial Owner box from the report, the Filer should take care not to accidentally delete the information for a Beneficial Owner who is required to be reported.

Most of the steps for this section will be similar to those for providing information about Company Applicants, so the Filer can refer to those steps. As with the Company Applicant section, if a Beneficial Owner has a FinCEN ID, this can be entered in response to Question 36, which will remove the remaining questions for the applicable Beneficial Owner.

There are three key differences between the information requested about Company Applicants and Beneficial Owners, as discussed below.

Filing Information Reporting Company Company Applicant(s) Beneficial Owner(s)	Submit
34. (This item is reserved for future use)	
Part III. Beneficial Owner Information	Add Beneficial Owner
⑦ Need help?	~
Beneficial Owner #1	^
⑦ Need help?	~
35. Parent/Guardian information instead of minor child (check if the Beneficial Owner is a minor child and the parent/guardian information is provided instead)	

The first key difference is in Question 35. A Filer should not report the information of a minor child, even if the minor child is a Beneficial Owner. Instead, the Filer should click the checkbox next to Question 35 and use the minor child's parent or guardian information to complete the remainder of that Beneficial Owner's section.



The second key difference is in Question 37. If a Beneficial Owner is an entity exempt from the CTA (you can read more about exemptions <u>here</u>), the Filer should click the checkbox next to Question 37. As shown above, doing so will remove all other questions about this Beneficial Owner except Question 38, in response to which the Filer should enter the exempt entity's full legal name. No additional information will be required about this Beneficial Owner; the Filer should, therefore, move on to the next Beneficial Owner or click the blue "Next" button to move on to the next section. If you have questions about whether an entity is exempt, contact the Entity's Verrill attorney.

The Filer should only list an entity as a Beneficial Owner when that entity is exempt. Otherwise, all the Beneficial Owners listed should be individuals. Please consult the Entity's Verrill attorney if you have questions about determining the Beneficial Owners.

⑦ Need help?		•
43. Address (number, street, and	apt. or suite no.)	*44. City
45. Country/Jurisdiction	*46. State	*47. ZIP/Foreign postal code

The final key difference between the information required of Beneficial Owners and that required of Company Applicants is in the address. The Filer should only list the residential address of a Beneficial Owner and should not provide a business address.

Once the Filer has entered all the required information for each Beneficial Owner, the Filer can click the blue "Next" button at the bottom of the page to move on to the final section.

Section Five: Submit the BOI Report

The final step requires the Filer to enter the Filer's own information, even if the Filer has previously provided the information as a Company Applicant and/or Beneficial Owner.

Filing Information	Reporting Company	Company Applicant(s)	Beneficial Owner(s)	Submit
Complete all fields below be status of your report. This c	efore submitting. Directly afte onfirmation page will also giv	r submission, a processing pa e you an opportunity to dowr	age will be displayed, followed nload a transcript of your repor	by a page confirming the t.
*Email				
Confirm Email				
*First Name				
*Last Name				

The Filer will be required to enter the Filer's email address twice and the Filer's first and last names.



The Filer will then be required to confirm that the Filer agrees with the certification statement and the compliance reminder by clicking the checkbox next to "I agree." The Filer should carefully review both the certification statement and the compliance reminder and confirm that the Filer agrees before checking the box.

If the Filer clicks the "I agree" certification box, but the report is not ready to submit, a popup, as shown below, will appear, listing where information is missing on the report.



The Filer can then close out of the pop-up by clicking the blue "Close" button and using the five section boxes to navigate the section's missing information. Required information missing in each section will be surrounded by a red box, as shown below.

Filing Information	Reporting Company	Company Applicant(s)	Beneficial Owner(s)	Submit
omplete all fields below be atus of your report. This o	efore submitting. Directly afte onfirmation page will also give	r submission, a processing pa	age will be displayed, followed by nload a transcript of your report.	a page confirming the
mail	100			
nail is a required field				
onfirm Email				
onfirm email is a require	d field			
irst Name				
rst name is a required fie	eld			
ast Name				
ast name is a required fie	ld			
Previous				Next

Once the Filer has provided all required information and successfully clicked the "I Agree" box next to the certification statement, the "Submit BOIR" button in the screenshot below should turn blue. The Filer can then click the button to validate that the Filer is human, complete any prompts required for that certification, and click the blue "Submit BOIR" button.

*I certify that I am author company, that the inform	ized to file this BOIR on beh ation contained in this BOII	nalf of the reporting company. R is true, correct, and complet	. I further certify, on behalf of t te.	he reporting
l agree				
to update beneficial o provision of false or fr may also be subject t beneficial ownership	ownership information prov raudulent beneficial owners o civil or criminal penalties information to FinCEN.	ided to FinCEN when previou ship information to FinCEN, m for willfully causing a reportir	isly reported information chan nay result in civil or criminal pe ng company to report incompl	ges, or the willful malties. A person ete or false
I am human	hCaptcha Privacy - Terms			

Save Confirmations for Entity's Records

Once the BOI report has been successfully completed, the Filer should take a screenshot of the confirmation screen and save it to the Entity's records. We recommend that the Filer also forward this screenshot to the Entity's Verrill attorney to add it to the Entity's records stored with the firm.

Shortly after submitting the BOI report, the Filer will receive an email from a .gov address confirming the submission of the report and providing a PDF of the reported information. As with the above, the Filer should save this email and PDF with the Entity's records. The Filer should also carefully review the PDF to confirm all information on the report is accurate. If not, the Filer should file a corrected report by repeating the above steps, but in Step 3 Question 1, the Filer should select "b. Correct prior report".

Continued Compliance

The BOI report is not a one-time filing. Entities required to report under the CTA must keep the information on the report up to date. Information on a BOI report can quickly become outdated, and the period for filing an updated BOI report is short—with updated reports due just 30 days from the date of the change prompting the update.

Common update situations include:

- Change of address or new trade name for the company;
- Change in the composition of management or the board;
- Change in listed address of any reported individual or entity;
- Lapsed driver's license or passport of a reported individual;

- A new investor in the company;
- An ownership transfer by a major stockholder (including upon a dissolution or merger); and
- The company newly qualifies for an exemption.

The Filer should work with the Entity to develop systems to ensure that BOI reports are updated within 30 days of any qualifying change.

You should contact the Entity's Verrill attorney if you have any questions regarding whether an updated BOI report is required.



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