#### CORPORATE TRANSPARENCY ACT

#### **NEW FEDERAL REPORTING REQUIREMENT**

The Corporate Transparency Act ("CTA"), which is overseen by the Department of Treasury's Financial Crimes Enforcement Network ("FinCEN") requires most business entities¹ (each, a "Reporting Company") to file reports with FinCEN with information about the Reporting Company.



#### To avoid civil and criminal penalties, these reports must be filed with FinCEN no later than the applicable deadline.

For companies formed on or after January 1, 2024:	Companies are required to file FinCEN reports within 90 days of formation.
For companies formed before January 1, 2024:	Companies are required to file FinCEN reports by January 1, 2025. We advise that you file this information as soon as is practicable.  Per FinCEN, these entities will be exempt from filing the Company Applicant information.
For changes in ownership or control and corrections:	Companies are required to report (1) certain changes in ownership or control within 30 days of the change and (2) corrections to previously filed reports within 30 days of becoming aware of or having reason to know of an inaccuracy.

FinCEN requires that you report the following information within the BOI (Beneficial Ownership Information) Portal, which can be found here BOI E-FILING (fincen.gov). Filing through the FinCEN portal is completely free. To mitigate your risk for fraud, we recommend you file with FinCEN directly or use an authorized provider of filing services. Authorized third-party vendor information and fee schedules for CTA filings are available upon request.

For assistance in determining who the Beneficial Owners are of your entity, please visit our CTA informational landing page. Still have questions? Please reach out to your relationship attorney or contact us at CTAcompliance@lplegal.com.

<sup>1</sup> There are several exemptions to these new reporting requirements, including an exemption for "large operating businesses" (i.e., 20+ employees at the same FEIN and \$5,000,000+ of revenue) and exemptions for other businesses that already have substantial regulatory requirements (e.g., accounting firms, SEC registered businesses, insurance companies, and publicly traded corporations). It is important to note that holding companies and most small operating businesses are <u>not</u> generally exempt from these BOI reporting requirements.



#### **Step-by-Step Instructions**

Beneficial Owner Information Report (BOIR) Online Filing Method



### Before You Begin

FinCEN ID 3500-0000-0000

1. Have the required identifying information (or FinCEN ID) available for beneficial owners and company applicants (if applicable)

Collect the required information from beneficial owners and company applicants (if applicable): each individual's name, date of birth, address, a unique identifying number from an acceptable identification document, and the name of the issuing jurisdiction of that identification document. (If an individual has a FinCEN ID, that may be collected instead.)

You *must* have this information available when filing a BOIR through the web filing method because you complete and submit the web filing in real time. *It cannot be saved and worked on later*.



2. **Obtain an electronic image of the acceptable identification document required for each company applicant and beneficial owner** unless a FinCEN ID is provided. An acceptable identification document is a non-expired: State-issued driver's license, State/local/Tribe-issued ID, U.S. passport, or foreign passport.

**NOTE:** A foreign passport is only acceptable if the individual does not have one of the other identifying documents.

The image must be a complete, clear, and readable image of the page or side of the identifying document containing the unique identifying number, and other identifying data. The supported formats are JPG/JPEG, PNG, and PDF. The maximum file size for each image is 4 MB.

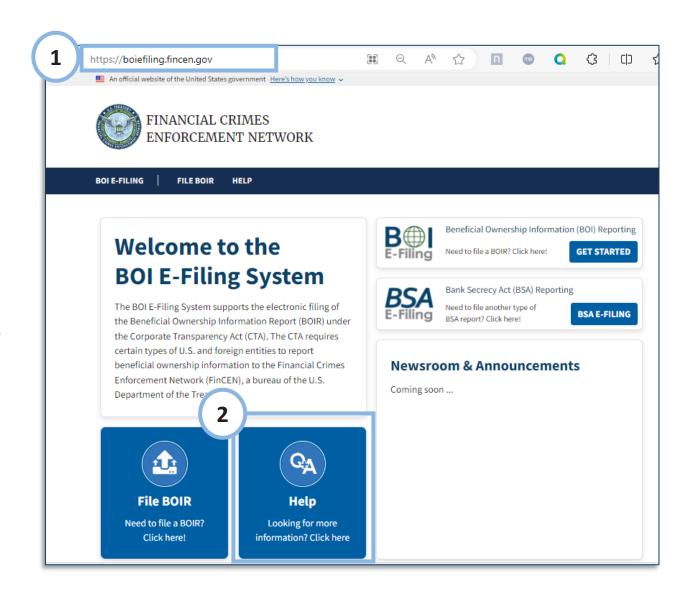


### BOI E-Filing System (1 of 2)

The BOIR can be submitted as a PDF (PDF BOIR) or online through a web browser (Online BOIR).

To file the Online BOIR, follow the steps outline below:

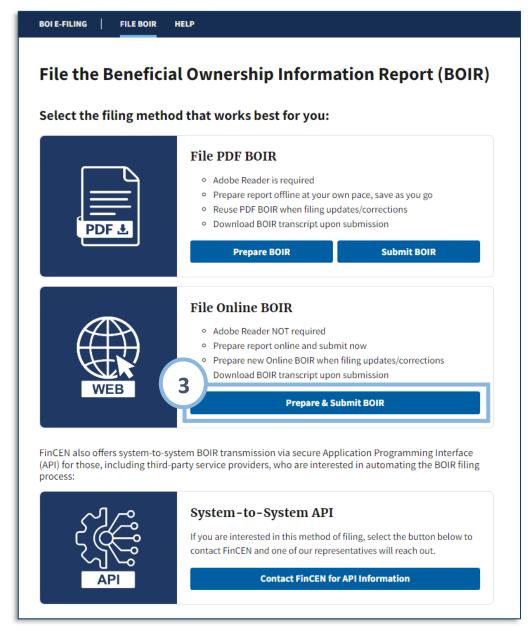
- 1. Go to boiefiling.fincen.gov in the web browser (e.g., Microsoft Edge, Google Chrome)
- 2. Select the **File BOIR** link/icon.





#### BOI E-Filing System (2 of 2)

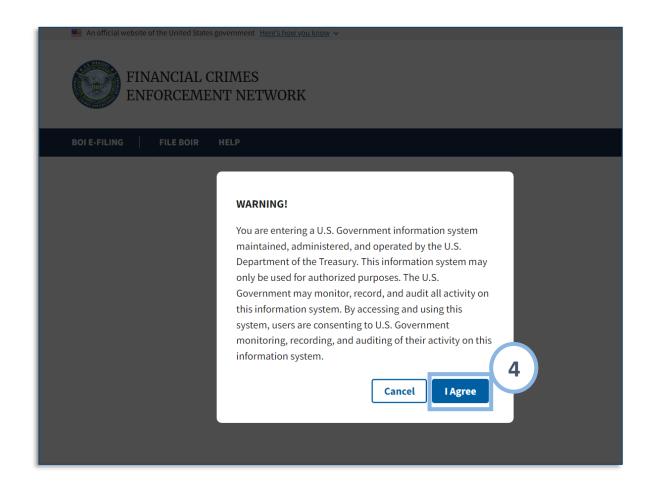
**3.** Click the **Prepare & Submit BOIR** button under the *File Online BOIR* section.





## Online BOIR - Warning

**4.** Review the warning language and click the **I Agree** button.





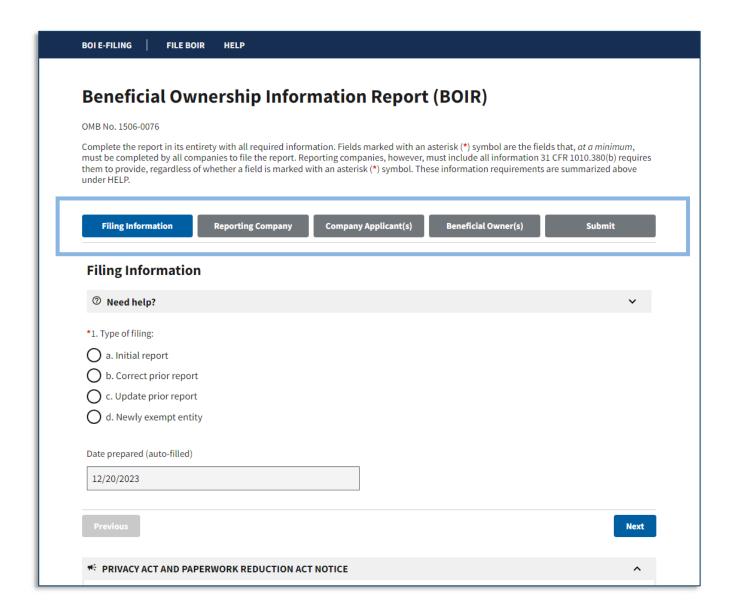
#### Online BOIR - Navigation

#### **Online BOIR Navigation Tabs**

- Filing Information
- · Reporting Company
- Company Applicant(s)
- Beneficial Owner(s)
- · Submit

The selected tab is highlighted in blue.

Navigate to a different part of the Online BOIR either by clicking the corresponding tab or by clicking the **Next** button in the bottom right corner.





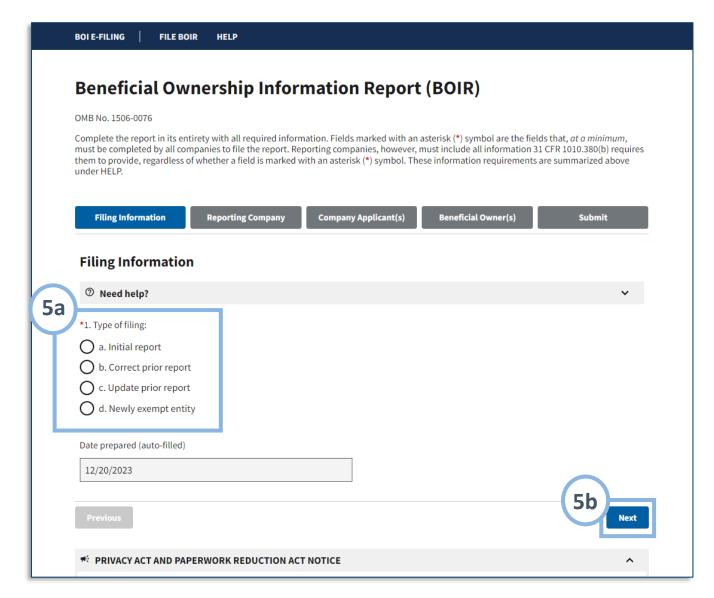
## Online BOIR – Filing Information

- **5.** Complete all required fields under the *Filing Information tab*:
- Type of filing: Under the Filing Information tab, select the type of filing you wish to make (Initial report, Correct prior report, Update prior report, Newly exempt entity). Only one option can be selected.

When Initial report is selected, no further information is required in this section. When Correct prior report, Update prior report, or Newly exempt entity is selected, fields are activated for Legal name, Tax identification type, and Tax identification number. Complete these fields with the reporting company information from the company's most recently filed prior BOIR.

The **Date prepared** field is auto-filled with the current date.

**5b**. Click the **Next** button.

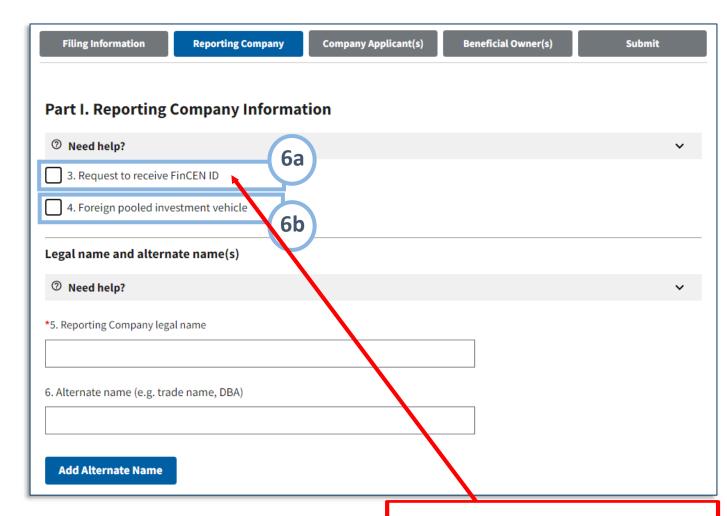




### Online BOIR - Reporting Company (1 of 4)

- **6.** Under the Reporting Company tab, complete sections and fields as required.
- **6a.** Select **Request to receive FinCEN ID** to receive a unique
  FinCEN identifier for the
  reporting company. The
  FinCEN identifier will be
  provided in the submission
  confirmation details provided
  to the filer directly after the
  BOIR is submitted/accepted.
- **6b.** Select the **Foreign pooled investment vehicle** option if the reporting company is a foreign pooled investment vehicle.

If this option is selected, *Company Applicant Information* is no longer required and is cleared/disabled. In addition, only one (1) beneficial owner must be reported under the *Beneficial Owner(s)* tab in this situation.



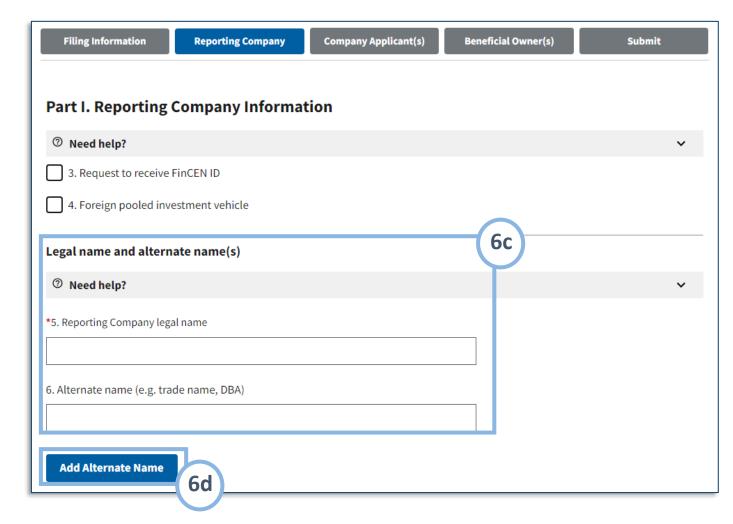
#### Optional: Obtain a FinCEN ID for the Reporting Company

Obtaining a FinCEN ID for the Reporting Company allows a Reporting Company to review its current BOIR and seamlessly update relevant sections of its current BOIR. We recommend obtaining a FinCEN ID for the entity if the entity itself is beneficial owner of multiple other entities or is anticipated to have many other additional filings/updates as a reporting company in the future. If a Reporting Company does not obtain a FinCEN ID, the Reporting Company is required to fill out this application for any updated or corrected BOIRs.



# Online BOIR - Reporting Company (2 of 4)

- **6c.** Complete the fields under the **Legal name and alternate name(s)** section as applicable.
- **6d.** To add more than one alternate name for the reporting company, click the **Add Alternate Name** button to add additional alternate reporting company names (up to 99 alternate names can be added).

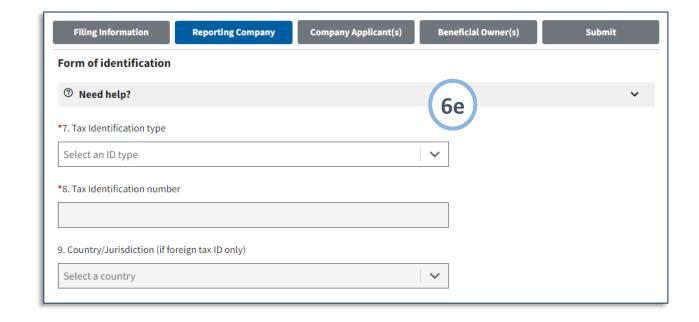




## Online BOIR - Reporting Company (3 of 4)

**6e.** Select the **Tax identification type** dropdown menu. EIN, SSN/ITIN, or Foreign may be selected. If the Foreign option is selected, the **County/Jurisdiction** field is enabled and required.

**NOTE:** An EIN or SSN/ITIN is required unless a foreign reporting company does not have one. In that case, the foreign reporting company may report its foreign tax identification number and the issuing jurisdiction.





### Online BOIR - Reporting Company (4 of 4)

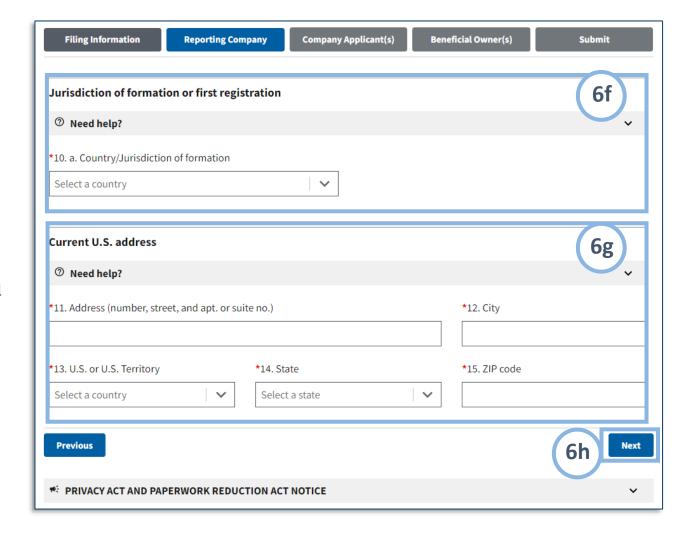
**6f.** Select the **Country/Jurisdiction of formation** dropdown menu.

If United States is selected, **State of formation** and **Tribal jurisdiction of formation** fields appear. One of these fields must be completed.

If a U.S. Territory is selected, **State of formation** field appears and is automatically populated with that U.S. Territory.

If a foreign country is selected, **State of first registration** and **Tribal jurisdiction of first registration** fields appear. One of these fields must be completed.

- **6g.** Complete all fields under the **Current U.S. Address** section. Select U.S. or U.S. Territory from this dropdown menu. If United States selected, the State dropdown must be completed. If U.S. Territory is selected, the State field is automatically populated with that U.S. Territory.
- **6h.** Click the **Next** button.





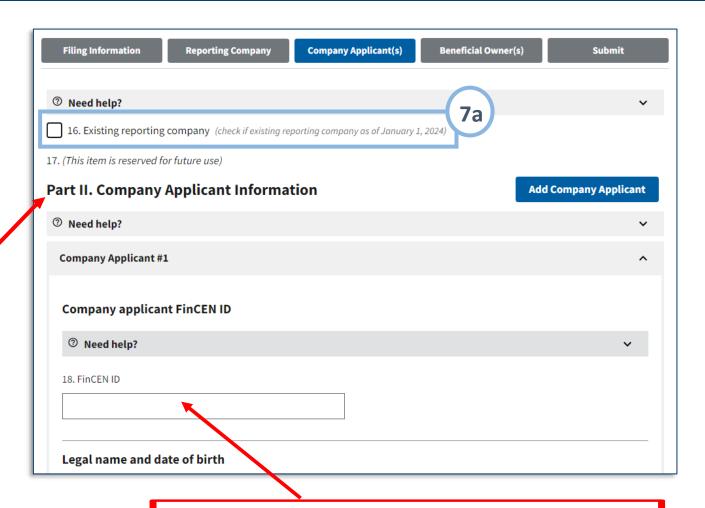
## Online BOIR - Company Applicant(s) (1 of 5)

- 7. Under the Company Applicant(s) tab, complete sections and fields as required.
- **7a.** Select the **Existing reporting company** checkbox if the
  reporting company was created or
  registered before January 1, 2024.

**NOTE:** When **Existing reporting company** is selected, *Company Applicant Information* is no longer required and the fields under this tab are cleared/disabled.

Reporting Company must identify at least 1, and no more than 2 company applicants.

Please note that by entering a company applicant FinCEN you don't need to complete fields 19-33 of the company applicant section of the report.

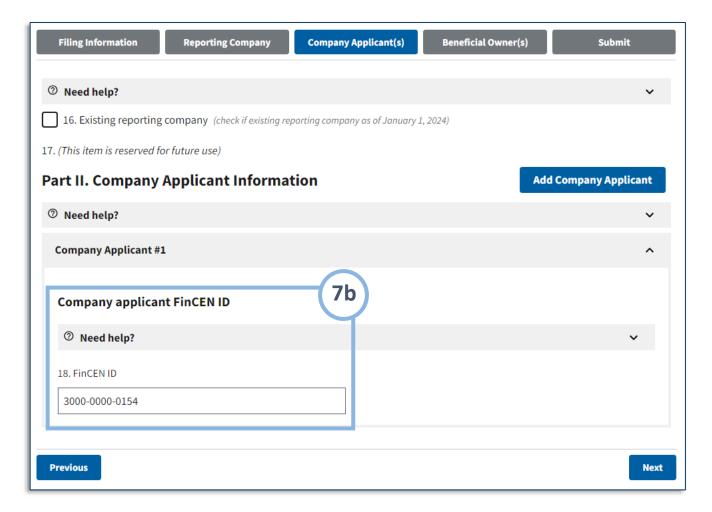


For companies formed by you by LP in 2024, you will have received one or two FinCEN ID's for the company applicant. Fill in here. For companies created before January 1, 2024, no FinCEN ID is needed here.



## Online BOIR - Company Applicant(s) (2 of 5)

**7b.** If applicable, enter the 12-digit **FinCEN ID** of the company applicant. After a valid FinCEN ID is entered, all remaining fields for the company applicant will be cleared/disabled.

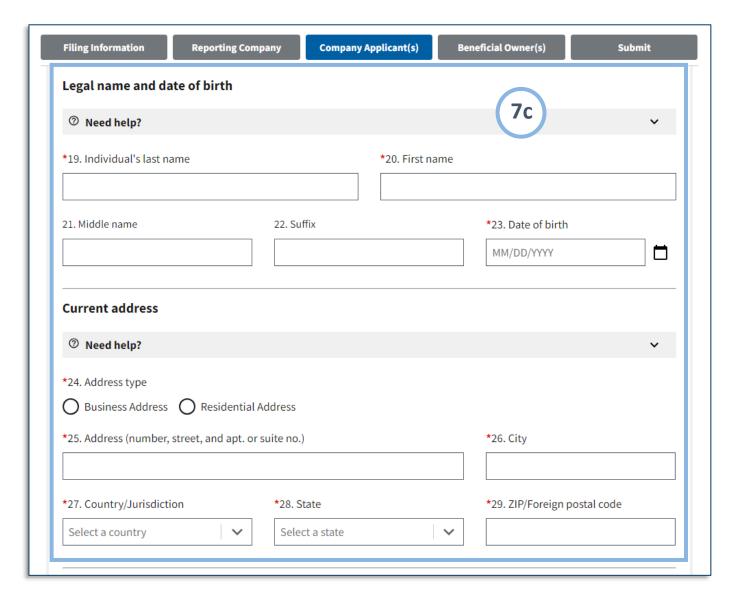




# Online BOIR - Company Applicant(s) (3 of 5)

7c. If you do not enter a **FinCEN**ID for a company applicant,
enter the company applicant's
information in the **Legal**name and date of birth and
Current Address sections.

**NOTE:** For a company applicant who forms or registers entities in the course of their business, report the street address of such business. Report the residential address of other company applicants.



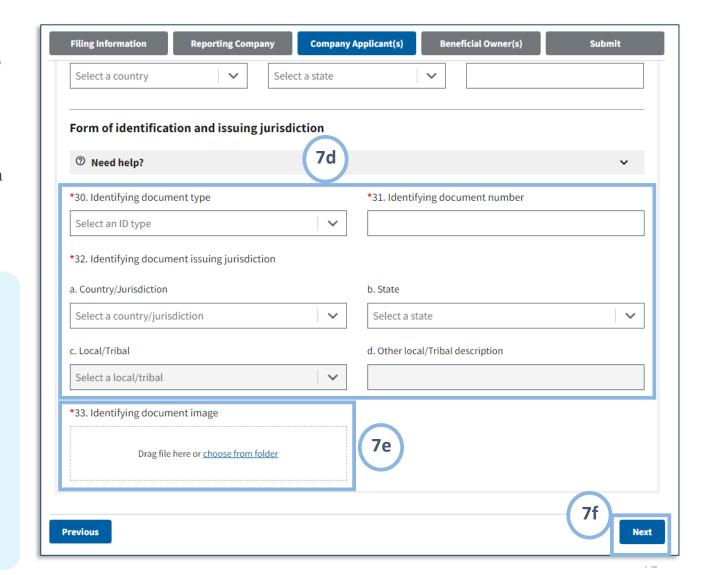


### Online BOIR - Company Applicant(s) (4 of 5)

- **7d.** If you do not enter a **FinCEN ID** for a company applicant, enter the company applicant's information under the **Form of identification and issuing jurisdiction** section.
- **7e.** If you do not enter a FinCEN ID for a company applicant, attach an image of an acceptable identifying document for the company applicant.

# Identifying document image guidelines:

- The image must be a complete, clear, and readable image of the page or side of the identifying document containing the unique identifying number, and other identifying data. One file must be attached.
- Supported formats are JPG/JPEG, PNG, and PDF.
- Maximum file size: 4MB



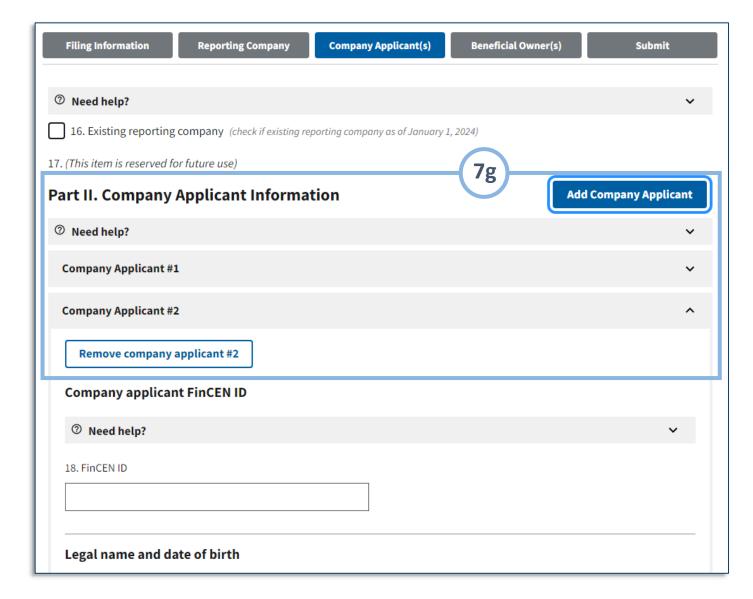
**7f.** Click the **Next** button.



#### Online BOIR - Company Applicant(s) (5 of 5)

**7g.** After providing the required information for a company applicant, click the Add **company applicant** button to add an additional company applicant if required. An additional company applicant section (i.e. Company Applicant #2) will be added under the first company applicant section (i.e. Company Applicant #1). Click the "Remove company applicant" button to remove a company applicant.

**NOTE:** Reporting companies are required to report up to two company applicants.



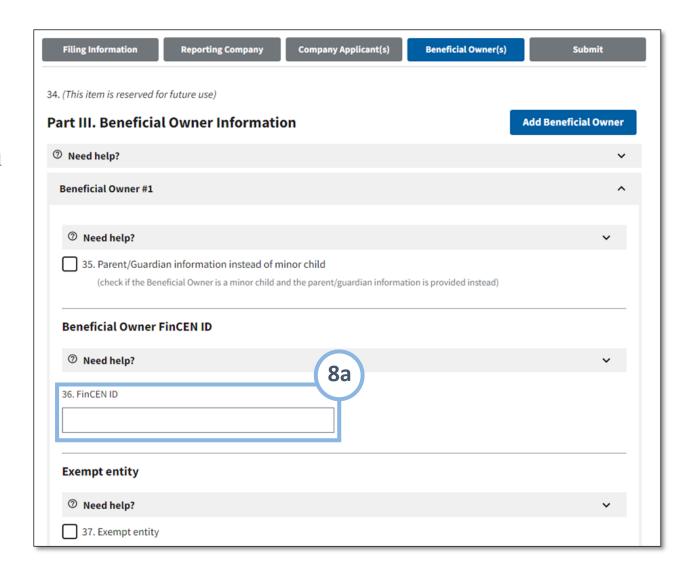


### Online BOIR - Beneficial Owner(s) (1 of 4)

**8.** Under the Beneficial Owner(s) tab, complete the sections and fields as required.

**NOTE:** Refer to the Small Entity Compliance Guide at fincen.gov/boi for additional information for special reporting situations.

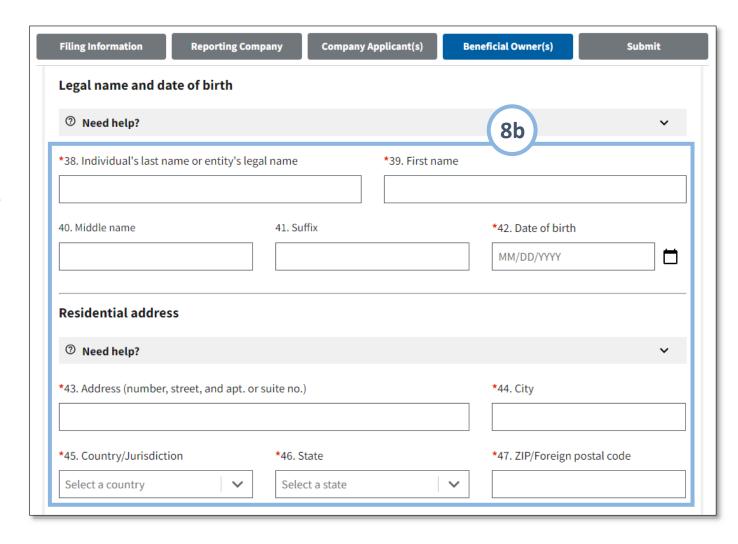
**8a.** If applicable, enter the 12-digit **FinCEN ID** of the beneficial owner. After a valid FinCEN ID is entered, all remaining fields (except for the **Parent/Guardian information instead of minor child checkbox**) for the *Beneficial Owner(s)* tab will be cleared/disabled.





### Online BOIR - Beneficial Owner(s) (2 of 4)

**8b.** If you do not enter a **FinCEN ID** for a beneficial owner,
enter the beneficial owner's
information in the **Legal name and date of birth**and **Residential address**sections.



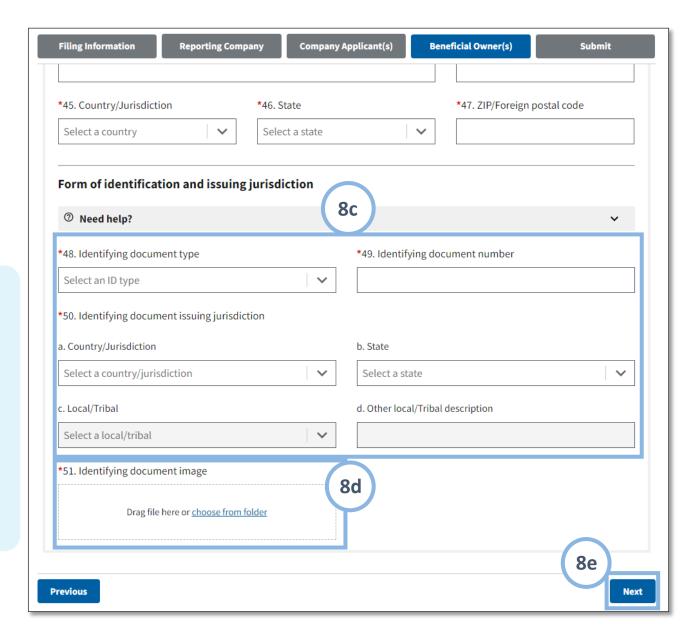


### Online BOIR – Beneficial Owner(s) (3 of 4)

- 8c. If you do not enter a **FinCEN ID** for a beneficial owner, enter information under the **Form of identification and issuing jurisdiction** section.
- **8d.** Attach an image of an acceptable identifying document for the beneficial owner.
- **8e.** Click the **Next** button.

#### Identifying document image guidelines:

- The image must be a complete, clear, and readable image of the page or side of the identifying document containing the unique identifying number, and other identifying data. One file must be attached.
- Supported formats are JPG/JPEG, PNG, and PDF.
- · Maximum file size: 4MB

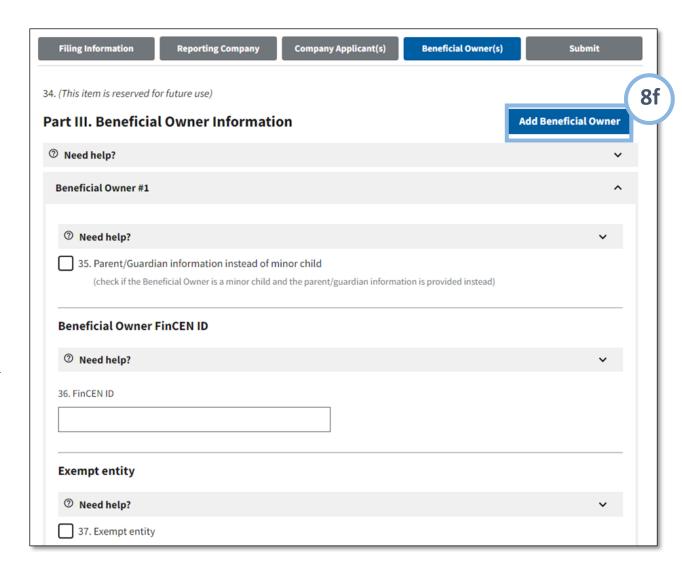




#### Online BOIR - Beneficial Owner(s) (4 of 4)

**8f.** After providing the required information for a beneficial owner, click the **Add Beneficial owner** button to add additional beneficial owners as needed.

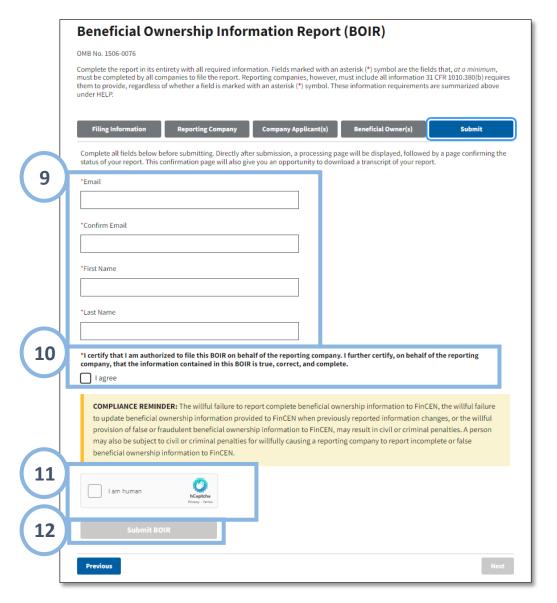
**Note:** There is no limit to the number of Beneficial Owners that may be reported. However, the BOIR limits the number of beneficial owners to 99.





#### Online BOIR - Submit

- **9.** Under the Submit tab, complete all required fields.
- 10. Select the I agree checkbox indicating that you certify that all information is true, correct, and complete. Selecting "I agree" to the certification will perform validation of all fields. If there are missing system-required fields or invalid entries, they will be displayed at this time and the I agree checkbox will NOT be selected.
- 11. Select the hCaptcha textbox **I am human**. You will be prompted with images to select in response to a question to verify you are not a robot.
- **12.** Click the **Submit BOIR** button.

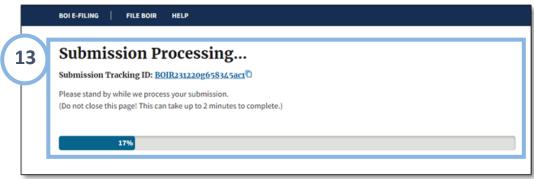


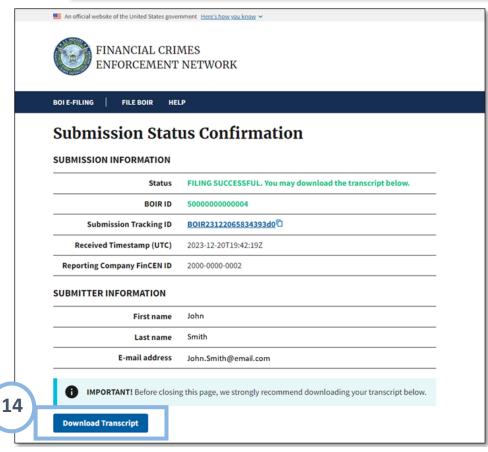


#### Online BOIR - Confirmation

- 13. The BOIR E-Filing System will display a progress bar during submission processing.

  After the submission is processed successfully, you will see the Submission Status Confirmation page.
- 14. Select the Download Transcript button to download a PDF copy of the transcript which includes a copy of the confirmation page details and the report data in transcript format. This serves as a receipt of your submission.







## **Updated and Corrected BOIRs**

BOIRs may be updated or corrected. **NOTE:** When a corrected or updated report is filed via the online BOIR, the filer will have to complete the *entire BOIR*, not just provide the updated/corrected information.

#### **Updated Reports**

Required when there is a change to previously reported information about the reporting company itself, or the beneficial owners.

#### **Versus**

#### **Corrected Reports**

Required when previously reported information was inaccurate when filed and remains inaccurate.



#### Online BOIR - Updated and Corrected Reports

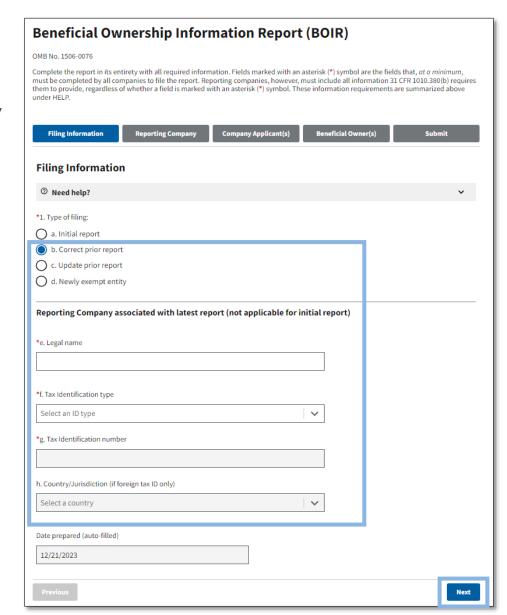
Access the Online BOIR as indicated in the previous steps.

Select the **Correct prior report, Update prior report,** or **Newly exempt entity** checkbox.

Note: When Correct prior report, Update prior report, or Newly exempt entity is selected, fields appear for Legal name, Tax identification type, and Tax identification number. Complete these fields with the reporting company information from the company's most recently filed prior BOIR.

When **Newly exempt entity** is selected, *Reporting Company*, *Company Applicant(s)* and *Beneficial Owner(s)* tabs are cleared/disabled. If **Correct prior report** or **Update prior report** is selected, these tabs remain active and should be completed as required.

Click **Next** and enter all required information and submit the Online BOIR.





#### Online BOIR – Common Errors

The following errors may be encountered when using the BOI E-Filing System. Methods to correct them are listed below.

**Error:** When attempting to certify the Online BOIR, a message displays indicating a missing field and highlighting it on the screen.

 $\sqrt{\phantom{0}}$  Fill in the missing required information, certify the BOIR, and submit.

Error: File size exceeded when attaching identifying document

√ If you upload an identifying document attachment that is greater than 4MB, you must decrease the size of your attachment file. For example, if the file is a JPEG image of a driver's license or passport, you can decrease the size of the image. The best way to decrease an image's size will depend on the image program used, but instructions for doing so generally may be found online.

**Error:** File type not accepted.

 $\sqrt{\phantom{a}}$  The only file types accepted for identifying document uploads are JPG/JPEG, PNG, and PDF. Check the file type and change it to one of the approved types, then re-attach the file.



#### Online BOIR – Common Errors

The following errors may be encountered when using the BOI E-Filing System. Methods to correct them are listed below.

**Error:** Only one file is accepted when you try to upload multiple identifying documents.

√ The system will allow you to upload only one identifying document attachment per beneficial owner or company applicant. Select one identifying document to attach for each beneficial owner or company applicant.

Error: 'Rejected' displays on BOIR submission confirmation page

 $\sqrt{\phantom{a}}$  The BOIR was not successfully filed. Review/resolve the error(s) displayed at the bottom of the submission status confirmation page and then resubmit.

Error: BOIR filing receives a status of Rejected due to error code SBE01

 $\checkmark$  This means that your BOIR could not be processed by FinCEN at this time. Resubmit the BOIR.