

## CORPORATE TRANSPARENCY ACT

### Overview

Effective January 1, 2024, the Corporate Transparency Act (CTA) requires approximately 32 million existing corporations, limited liability companies, and other business entities formed or registered to do business in the United States (US), as well as many of the approximately 5 million such entities newly formed each year going forward, to electronically file a beneficial ownership information report (BOI Report) with the US Department of Treasury's Financial Crime Enforcement Network (FinCEN). The CTA and the disclosure obligations it imposes upon reporting companies is designed to help safeguard US national security and provide law enforcement agencies with an additional tool to fight a variety of financial crimes. Non-compliance with the CTA's beneficial ownership information reporting requirements may result in civil and/or criminal penalties.

As a result of this new Federal requirement, it is anticipated that reporting companies and their beneficial owners will have questions regarding the new beneficial ownership information reporting requirements. Mirick O'Connell's Business Group has established this landing page to assist reporting companies and their beneficial owners with the various aspects of the beneficial ownership information reporting under the CTA.

Please feel free to contact Attorneys [Jeffrey E. Swalm](#), [Jennifer Z. Flanagan](#), or [Zachary B. Luczyk](#) if you have any questions.

Mirick O'Connell Resources:

|   |  |
|---|--|
| Corporate Transparency Act<br><b>Client Alert</b> | Navigating the FinCEN website<br><b>Step-by-Step Guide: Filing a Beneficial Ownership Information Report</b> |
| Corporate Transparency Act<br><b>Q &amp; A</b>    | Navigating the FinCEN website<br><b>Step-by-Step Guide: Obtaining a FinCEN ID</b>                            |



Select "Create a FinCEN ID" hyperlink

FinCEN Resources:

|  |  |   |  |
|--|--|---|--|
| Beneficial Ownership Information<br><b>Homepage</b>            | Reporting Requirements<br><b>Small Entity Compliance Guide</b> | Beneficial Ownership Information<br><b>Video presented by FinCEN</b>                | <b>Click Here to File</b><br>your Beneficial Ownership Information Report              |
| Beneficial Ownership Information<br><b>Filing Instructions</b> | Beneficial Ownership Information<br><b>Create a FinCEN ID</b>  | <b>Who Has Access</b><br>to your company's Beneficial Ownership Information Report? | <b>Is your company exempt</b><br>from the Beneficial Ownership Reporting Requirements? |

- OUR PRACTICES
- Alternative Dispute Resolution
- Business**

  - Business Overview
  - ▶ **Corporate Transparency Act**
  - Employee Benefits and Executive Compensation
  - Financing
  - Mergers and Acquisitions
  - Securities and Venture Capital
  - Tax

- Construction Law
- Creditors' Rights, Bankruptcy and Reorganization
- Education Law
- Family Law and Divorce
- Health Law
- Individual Client Services
- Intellectual Property
- Labor, Employment and Employee Benefits
- Litigation



# Welcome to the FinCEN ID Application for Individuals

[Sign in or Create an Account with LOGIN.GOV](#)

**Start here by creating a LOGIN.GOV account or, if you already have LOGIN.GOV account, sign in.**



## What is a FinCEN ID for individuals?

A FinCEN ID is a unique identifying number issued to an individual by FinCEN. Although there is no requirement to obtain a FinCEN ID, doing so can simplify the reporting process.



## What does a FinCEN ID do for individuals?

An individual beneficial owner or company applicant's FinCEN ID can be reported instead of required information about that individual on the reporting company's Beneficial Ownership Information Report (BOIR) submitted to FinCEN.



## How does an individual get a FinCEN ID?

To obtain a FinCEN ID for yourself, click the Create Account button to create an account and begin the application for a FinCEN ID. If you already have an account, login in to enter your identifying information on the FinCEN ID application. If you have additional questions, visit our Help Page.



Sign in using a trusted authentication provider.  
Trusted providers secure digital identities and help us confirm and protect your identity.

**Click here**



U.S. Department of the Treasury is using Login.gov to allow you to sign in to your account safely and securely.

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[Forgot your password?](#)

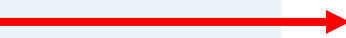
[Security Practices and Privacy Act Statement](#)

[Privacy Act Statement](#)

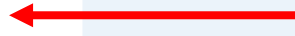
If you have a LOGIN.GOV account, select "Sign in"



Click "Sign in"



Sign in to your LOGIN.GOV account using your LOGIN.GOV sign in credentials





**U.S. Department of the Treasury** is using Login.gov to allow you to sign in to your account safely and securely.

**Create an account for new users**

Enter your email address

**Select your email language preference**  
Login.gov allows you to receive your email communication in English, Spanish or French.

English (default)  
 Español  
 Français

I read and accept the Login.gov [Rules of Use](#)

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**For new LOGIN.GOV users, select "Create an account"**



**Enter the email address you would like to use**



**Select desired language**



**Select box to agree to "Rules of Use"**





Check your email and  
select "Confirm email  
address"

## Confirm your email

Thanks for submitting your email address. Please click the link below or copy and paste the entire link into your browser. This link will expire in 24 hours.

**Confirm email address**

[https://secure.login.gov/sign\\_up/email/confirm?  
\\_request\\_id=cc988cee-86c6-4ad1-99cf-  
3a972a97e07f&confirmation\\_token=infEVcqyDxYVFBvyco63](https://secure.login.gov/sign_up/email/confirm?_request_id=cc988cee-86c6-4ad1-99cf-3a972a97e07f&confirmation_token=infEVcqyDxYVFBvyco63)

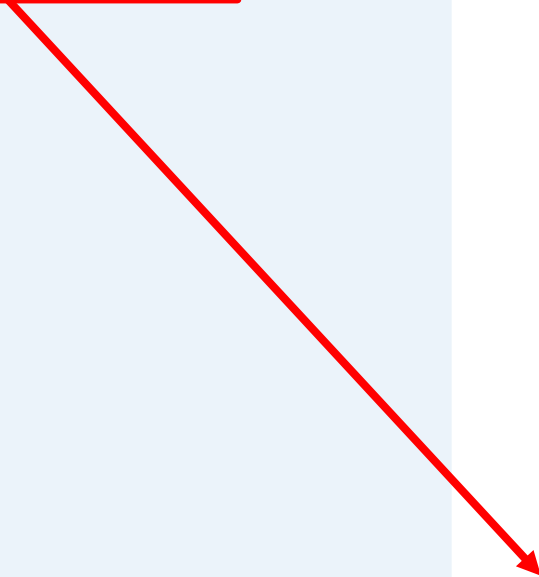
Please do not reply to this message. If you need help, visit [login.gov/help/](https://login.gov/help/)

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Sent at 2024-01-04T15:36:21.214239Z



Create a strong password and click "Continue"



✔ You have confirmed your email address

### Create a strong password

Your password must be **12 characters** or longer. Don't use common phrases or repeated characters, like abc or 111.

Password

Confirm password

Show password

Password strength: ...

Continue



## Continue to U.S. Department of the Treasury

We'll share your information with **U.S. Department of the Treasury** to connect your account.

✔ Email addresses on your account

•

⚠ [Add a second authentication method](#). You will have to delete your account and start over if you lose your only authentication method.

**Agree and continue**






[Cancel](#)

Click "Agree and continue"



### Authentication method setup

Add another layer of security by selecting a multi-factor authentication method. We recommend you select at least two different options in case you lose one of your methods.

-  **Authentication application**  
Download or use an authentication app of your choice to generate secure codes.
-  **Text or voice message**  
Receive a secure code by (SMS) text or phone call.
-  **Backup codes**  
A list of 10 codes you can print or save to your device. When you use the last code, we will generate a new list. Keep in mind backup codes are easy to lose.
-  **Security key**  
A physical device, often shaped like a USB drive, that you plug in to your device.
-  **Government employee ID**  
PIV/CAC cards for government and military employees. Desktop only.

Continue

Select desired authentication method(s). At a minimum, "Text or voice method" should be selected

Once you have selected your desired authentication method(s) click "Continue"

## Add a phone number

We'll send you a one-time code each time you sign in.

Message and data rates may apply. Do not use web-based (VOIP) phone services or premium rate (toll) phone numbers.

Phone number

How you'll get your code

 Text message (SMS) Phone call

You can change this anytime. If you use a landline number, select "Phone call."

Send code

This site is protected by reCAPTCHA and the Google [Privacy Policy](#) and [Terms of Service](#) apply. Read Login.gov's [Mobile Terms of Use](#).

[Choose another authentication method](#)

Select "Text message (SMS)"

Add your cell phone number

Click "Send code"

### Enter your one-time code

We sent a text (SMS) with a one-time code to  
This code will expire in 10 minutes.

One-time code

Example: 123456

Remember this browser

Submit

[Send another code](#)

Having trouble? Here's what you can do:

[Use another phone number](#) >

[I didn't receive my one-time code](#) >

[Learn more about authentication options](#) >

[Choose another authentication method](#)

Enter one-time code sent  
via text message here

If you did not receive the  
one-time code or the one-  
time code expired, click  
"Send another code"

Click "Submit"

✓ A phone was added to your account.



### You've added your first authentication method! Add a second method as a backup.

Adding another authentication method prevents you from getting locked out of your account if you lose one of your methods.

[Add another method](#)

[Skip for now](#)

Click "Skip for now"



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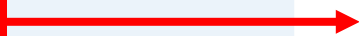
[Forgot your password?](#)

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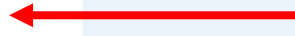
[Privacy Act Statement](#)

**\*the website may time out and require you to go back to the LOGIN.GOV sign in page in order to complete your application for FinCEN Identifier**

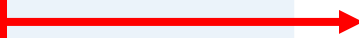
**Select "Sign in"**



**Sign in to your LOGIN.GOV account using your LOGIN.GOV sign in credentials**



**Click "Sign in"**





**Insert your full legal name and date of birth as it appears on your identifying document**

# FinCEN Identifier (FinCEN ID) Application

OMB No. 1506-0076

Filers must provide information in EVERY field marked with the \* symbol in ALL CIRCUMSTANCES. Filers must also provide information in all fields not marked with the \* symbol that are applicable to the filer. For example, the "Middle Name" field is not marked with a \* symbol; the filer MUST provide information in that field IF the relevant individual's legal name includes a middle name. Notwithstanding any other instruction, individuals must provide all information required pursuant to 31 CFR 1010.380(b).

## Full legal name and date of birth

[? Need help?](#)

|                      |                      |                      |                      |   |
|----------------------|----------------------|----------------------|----------------------|---|
| * First name         | Middle name          | * Last name          | Suffix               | * Date of birth                         |
| <input type="text"/> | <input type="text"/> | <input type="text"/> | <input type="text"/> | <input type="text" value="mm/dd/yyyy"/> |

## Address

[? Need help?](#)

\* Address type

Residential address  Business address

[+ Add address](#) [- Remove address](#)

## Address

### ? Need help?

**Address type:** Indicate address type as “Residential address” or “Business address” for the individual. Add an address by clicking the “+ Add additional address” button, or remove an address by clicking the “- Remove address” button. Report both the individual’s residential address and business address if the FinCEN ID will be reported on a BOIR as both a beneficial owner and a company applicant who forms or registers an entity in the course of your business.

**Individual address:** Enter the individual’s street address information, including the city, country or jurisdiction, State, and ZIP code or foreign postal code. U.S. Territories are included in the drop-down menu for “Country/ Jurisdiction.” The “State” will be automatically populated when a U.S. Territory is selected in the “Country/Jurisdiction”. “State” is required if the country selected is the United States, Canada, or Mexico.

**Beneficial Owners must provide their current residential address**

\* Address type

Residential address  Business address

\* Address (number, street, and apt. or suite no.)

\* City

\* Country/Jurisdiction

\* ZIP/Foreign postal code

+ Add address

- Remove address

Address (2)

\* Address type

Residential address  Business address

\* Address (number, street, and apt. or suite no.)

\* City

\* Country/Jurisdiction

\* ZIP/Foreign postal code

+ Add address

- Remove address

**To add a business address, select “Add address”**

**Company Applicants are recommended to include both current residential and business address**

**Need help?**

**Identifying document type:** Select the individual's identifying document type from the list of acceptable documents: a non-expired State-issued driver's license, a non-expired State/local/Tribe-issued identification document issued for the purpose of identifying the individual, a non-expired U.S. passport, or, only if the individual does not have one of these identifying documents, a non-expired foreign passport.

**Identifying document number:** Enter the identifying document number from the individual's identifying document.

**Identifying document issuing jurisdiction:** Enter in item 14 the jurisdiction that issued the individual's identifying document. The FinCEN ID application populates fields 14a-14d depending on the identifying document type selected in item 12. Item 14a is required if item 12a, 12b, or 12d are selected. If item 12c is selected, the FinCEN ID application recognizes the country/jurisdiction as the United States. If a U.S. Territory issued the identifying document, select the applicable U.S. Territory in item 14a (the same U.S. Territory will then be automatically populated in item 14b "State" as a result). Item 14b is required when the country/jurisdiction selected in 14a is the United States, Canada, or Mexico. Item 14c is required if a local or Tribal government issued the identifying document. Select the applicable local or Tribal description in item 14c. If the name of the relevant local or Tribal jurisdiction is not included in the drop-down menu in item 14c, select "Other" and enter the name of the local or Tribal jurisdiction in item 14d.

**Identifying document image:** Drag a file or click "choose from folder" to attach a clear, readable image of the page or side of the identifying document referenced in item 15 containing the unique identifying number and other identifying data. You can remove the attached image if necessary. An attachment to a FinCEN ID application submission can be no larger than four (4) megabytes of data.

**Select appropriate identifying document type**

**\*if you have a state-issued driver's license it is recommended you use that as your identifying document**

\* Identifying document type

- State-issued driver's license    State/local/Tribe-issued ID    U.S. passport    Foreign passport

\* Identifying document number

\* Country/Jurisdiction

\* State

\* Identifying document image

Accepted file types: JPG/JPEG, PNG, and PDF

Drag file here or [choose from folder](#)

**All information provided must match what is stated in your identifying document**

**Upload identifying document matching the information provided above**



## Certification

\* I certify that the information furnished is true, correct, and complete.

**⚠ COMPLIANCE REMINDER:** The willful provision of false or fraudulent beneficial ownership information to FinCEN may result in civil or criminal penalties.

I agree

Select "I agree"

Submit

### **! PRIVACY ACT AND PAPERWORK REDUCTION ACT NOTICE**

This notice is given under the Privacy Act of 1974 (Privacy Act) and the Paperwork Reduction Act of 1995 (Paperwork Reduction Act). The Privacy Act and Paperwork Reduction Act require that FinCEN inform persons of the following when requesting and collecting information in connection with this collection of information.

This collection of information is authorized under 31 U.S.C. 5336 and 31 C.F.R. 1010.380. The principal purpose of this collection of information is to generate a database of information that is highly useful in facilitating national security, intelligence, and law enforcement activities, as well as compliance with anti-money laundering, countering the financing of terrorism, and customer due diligence requirements under applicable law. Pursuant to 31 U.S.C. 5336 and 31 C.F.R. 1010.380, reporting companies and certain other persons must provide specified information. The provision of that information is mandatory and failure to provide that information may result in criminal and civil penalties. The provision of information for the purpose of requesting a FinCEN Identifier is voluntary; however, failure to provide such information may result in the denial of such a request.

Generally, the information within this collection of information may be shared as a "routine use" with other government agencies and financial institutions that meet certain criteria under applicable law. The complete list of routine uses of the information is set forth in the relevant Privacy Act system of record notice available at:

<https://www.federalregister.gov/documents/2023/09/13/2023-19814/privacy-act-of-1974-system-of-records>

According to the Paperwork Reduction Act of 1995, no persons are required to respond to a collection of information unless it displays a valid OMB control number. The valid OMB control number for this information collection is 1506-0076. It expires on November 30, 2026.

The estimated average burden associated with this collection of information from reporting companies is 90 to 650 minutes per respondent for reporting companies with simple or complex beneficial ownership structures, respectively. The estimated average burden associated with reporting companies updating information previously provided is 40 to 170 minutes per respondent for reporting companies with simple or complex beneficial ownership structures, respectively. The estimated average burden associated with this collection of information from individuals applying for FinCEN identifiers is 20 minutes per applicant. The estimated average burden associated with individuals who have obtained FinCEN identifiers updating information previously provided is 10 minutes per individual. Comments regarding the accuracy of this burden estimate, and suggestions for reducing the burden should be directed to the Financial Crimes Enforcement Network, P. O. Box 39, Vienna, VA 22183, Attn: Policy Division.

Click  
"Submit"