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January 30, 2026

Delegate Kriselda Valderrama, Chair  
House Economic Matters Committee  
230 Taylor House Office Building  
Annapolis, Maryland 21401

**Re: MSBA Business Law Section Council -- House Bill 0308 – Favorable with Amendments**

Dear Chair Valderrama and Fellow Committee Members:

The Business Law Section Council (the “Section Council”) of the Maryland State Bar Association (the “MSBA”) annually reviews proposed legislation that may affect Maryland businesses. We do so as volunteers generally concerned and interested in the advancement of business law in Maryland.

The Section Council has reviewed House Bill 0308 “Corporations and Associations – Principal Offices – Private Mailboxes” (“HB 308”). The Section Council wishes to share its general support for the proposed HB 308, as creating needed flexibility for Maryland businesses, subject to certain important amendments we view as necessary to avoid unintended consequences. The Section Council would support HB 308 if certain amendments were made, as further discussed below.

HB 308 makes clear that Maryland businesses may designate a commercial mail receiving agency (“CMRA”) address as the entity’s principal office, thereby aligning statutory requirements with contemporary business realities. Acknowledging this option in the statute is timely and valuable given the increased adoption of remote and hybrid work models for Maryland businesses and the prevalence of shared office space arrangements, both of which have reduced the need for, and frequency of, businesses having a dedicated physical office space.

Our Section Council would urge two targeted amendments to ensure that HB 308 achieves its intended effect without unintended consequences to Maryland businesses and to ensure compliance with Maryland law.

First, we propose striking § 1–407(B) from the current proposed HB 308. As drafted, § 1–407(B) requires that CMRAs provide certain information on USPS Form 1583 (as provided by the CMRA’s customers), to the Maryland State Department of Assessments and Taxation (“SDAT”) or to law enforcement agencies, on request. This provision imposes a direct statutory obligation on CMRAs to disclose identifying information of its customer, on demand. CRMAs may be reluctant to enter into commercial mail receiving agreements with Maryland businesses, if this statutory mandate remains, as it imposes obligations, by statute, that are not otherwise applicable to operating its business as a CMRA. This may cause HB 308 to have the perverse effect of reducing Maryland businesses’ ability to take advantage of these commercial mail services. Separately, the information that is required under USPS Form 1583 is not presently required for purposes of a principal office under the statute and should not be necessary here.

Second, HB 308 should be amended to require that any CMRA address designated as the principal office, be an address located in Maryland. As drafted, § 1-101(w) would permit, a principal office to be “an address supplied by a commercial mail receiving agency,” but it does not expressly require that such CMRA address be a Maryland address. Maryland law currently requires that a principal office address be an address in the State of Maryland and so making this explicit in the proposed HB 308 will ensure that the use of a CMRA address does not become inconsistent with such requirement.

The Section Council would be in favor of HB 308 in the event that the proposed amendments were made, but would caution that, without these amendments, HB 308 may end up having unintended and adverse consequences on Maryland businesses and Maryland law.

Respectfully submitted,

MSBA Business Law Section Council  
I. DeAndrei Drummond, Chair

cc: Delegate Qi  
Delegate Hill