



February 3, 2026

The Honorable Jheanelle K. Wilkins, Chair
House Ways and Means Committee
130 Taylor House Office Building
Annapolis, Maryland 21401

Support: HB 82 – Recordation and Transfer Tax – Exemption for Related Entities

Dear Chair, Wilkins and Committee Members:

The NAIOP Maryland Chapters represent approximately 700 companies involved in all aspects of commercial, industrial, and mixed-use real estate. On behalf of our member companies, I am writing to support HB 82.

Maryland law has long established exemptions from the recordation and transfer taxes for transfers between related businesses or other types of entities. The policy reason is that these transactions typically do not represent a true “sale” or change in beneficial ownership. Instead, the ownership interest is merely being reorganized, consolidated, or shifted within the same economic unit.

HB 82 amends the Tax - Property Article to extend this exemption to include common law trusts. The bill further clarifies that the definitions of “Owner” and “Business Entity” include common law trusts by referencing § 12-101 of the Corporations and Associations Article.

NAIOP respectfully requests your favorable report on HB 82.

Sincerely,

A handwritten signature in blue ink, appearing to read "T.M. Ballentine".

Tom Ballentine, Vice President for Policy
NAIOP – Maryland Chapters, *The Association for Commercial Real Estate*

cc: Ways and Means Committee Members
Nick Manis – Manis, Canning Assoc.