



## **Letter of Information**

### **Senate Bill 766 – Taxes – Whistleblower Reward Program – Alterations** *Budget & Taxation Committee* *March 4, 2026*

The Comptroller of Maryland is respectfully submitting this letter of information regarding Senate Bill 766 – Taxes – Whistleblower Reward Program – Alterations. SB766 expands the covered enforcement actions under the Whistleblower Reward Program.

The Whistleblower Reward Program (WRP) was established in 2021 as an incentive to the public to report tax improprieties to the Comptroller's office for the purpose of auditing and investigating potential tax fraud. The Comptroller is responsible for administering the program, which provides a monetary reward to a whistleblower who provides original information to the Comptroller that results in a final assessment against a taxpayer.

While the Comptroller is the revenue administrator for the State of Maryland, several tax types fall outside the Comptroller's jurisdiction, such as premium receipts taxes (which are overseen by the Maryland Insurance Administration) and property taxes (which fall under the Department of Assessments and Taxation). In determining how to interpret whistleblower claims related to taxes administered by other agencies, the Comptroller sought advice of counsel, and the Office of the Attorney General advised that the WRP is only applicable to taxes collected by the Comptroller under the Tax – General Article.

SB766 states that covered enforcement actions under the WRP include enforcement actions brought by entities other than the Comptroller. We appreciate the clarity that SB766 provides regarding the types of claims that may be brought before the WRP, as well as on questions such as eligibility determination and retroactivity. However, we believe there are still some areas that will require clarification, such as the source of funds to be used for payment of claims and whether the provisions apply to local taxes established in the Local Government Article of the Maryland Annotated Code. Our office has drafted proposed amendments to address these questions and otherwise improve the administration of the Whistleblower Reward Program.

Thank you for your consideration of these amendments. If you have any questions, please reach out to Matthew Dudzic, Director of State Affairs, at [MDudzic@marylandtaxes.gov](mailto:MDudzic@marylandtaxes.gov).

