

Other/Miscellaneous:

Maryland: Digital Advertising Gross Revenues Tax Refund Denial Notices Give Taxpayers Only 30 Days to Appeal

It has come to our attention that the Maryland Comptroller has started issuing some denial notices for refund claims for the 2022 digital advertising gross revenues tax (DAGRT). Based on our understanding, the denial notices appear to be issued beginning in October 2023, and they instruct a taxpayer recipient to file any appeal directly to the Maryland Tax Court within 30 days of the date of the notice. If a taxpayer does not file a timely appeal to the Maryland Tax Court, it may risk its right to claim a refund for the 2022 DAGRT. Accordingly, impacted taxpayers may want to consider consulting legal counsel if they plan to file an appeal to the Maryland Tax Court. To this end, it appears that some impacted taxpayers already have begun filing appeals to the Maryland Tax Court – as such, it is possible that one case may move forward in the process while others may be held at the Maryland Tax Court pending final resolution. Please contact us with any questions.

— Joe Carr (McLean)
Managing Director
Deloitte Tax LLP
josecarr@deloitte.com

Michael Spencer (Washington, DC)
Senior Manager
Deloitte Tax LLP
mispencer@deloitte.com

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