

the return under oath if required to do so by the Comptroller. The Comptroller for good cause shown may on the written application of a taxpayer extend the time for making any return required by this section.

327. Where the Comptroller, in his discretion, deems it necessary to protect the revenues to be obtained under the provisions of this sub-title, he may require any taxpayer file with him a bond issued by a surety company authorized to do business in this State and approved by the State Insurance Commissioner as to solvency and responsibility, in such amounts as the Comptroller may fix to secure the payment of any tax or penalties due or which may become due from such taxpayer. In the event that the Comptroller determines that a taxpayer is to file such a bond, he shall give notice to such taxpayer to that effect, specifying the amount of the bond required. The taxpayer shall file such bond within five (5) days after the giving of such notice unless within such five (5) days the taxpayer shall request in writing a hearing before the Comptroller, at which hearing the necessity, propriety and amount of the bond shall be determined by the Comptroller. Such determination by the Comptroller shall be final and shall be complied with within fifteen (15) days after the taxpayer is given notice thereof.

328. In lieu of the bond required by Section 327 of this sub-title, securities approved by the Comptroller or cash in such amount as he may prescribe may be deposited, which shall be kept in the custody of the Comptroller, who may at any time, without notice to the depositor, apply them to any tax and/or interest or penalties due, and for that purpose the securities may be sold by the Comptroller at public or private sale without notice to the depositor.

329. (a) The tax imposed by this sub-title and all increases, interests and penalties thereon shall become, from the time due and payable a personal debt of the person liable to pay the same to the State of Maryland. An action may be brought at any time within six (6) years from the time the tax shall be due and payable by the Comptroller in the name of the State to recover the amount of any taxes, penalties and interest due under the provisions of this sub-title, but such actions shall be utterly barred after the expiration of the aforesaid six (6) years.

(b) The tax, and all increases, interests and penalties thereon shall be a lien upon the property of any person