

ALLOWED AS A DEDUCTION OR AS AN OFFSET AGAINST THE SALES PRICE OF PROPERTY IN DETERMINING GAIN OR LOSS IF THE AMOUNT HAS BEEN ALLOWED AS A DEDUCTION IN COMPUTING THE FEDERAL TAXABLE INCOME OF THE ESTATE OR OF ANY OTHER PERSON.

13-601.

(d) Interest on unpaid Maryland estate tax begins 9 months after the date of the death of a decedent and applies to ALL MARYLAND ESTATE tax that is not paid by that date, including:

(1) an increase in Maryland estate tax due to a change in federal estate tax made after a payment of Maryland estate tax; and

(2) a payment made in accordance with an alternative payment schedule.

13-716.

(A) THE COMPTROLLER SHALL ASSESS A PENALTY OF 25% OF THE AMOUNT OF THE UNDERPAYMENT OF TAX WHICH IS ATTRIBUTABLE TO ANY SUBSTANTIAL ESTATE TAX VALUATION UNDERSTATEMENT.

(B) FOR PURPOSES OF THIS SECTION, THERE IS A SUBSTANTIAL ESTATE TAX VALUATION UNDERSTATEMENT IF THE VALUE OF ANY PROPERTY CLAIMED, OR THAT SHOULD HAVE BEEN CLAIMED, ON ANY RETURN OF TAX IMPOSED BY TITLE 7, SUBTITLE 3 OF THIS ARTICLE IS 60% OR LESS OF THE AMOUNT DETERMINED TO BE THE CORRECT AMOUNT OF THAT VALUATION.

(C) A PENALTY MAY NOT BE IMPOSED UNDER SUBSECTION (A) OF THIS SECTION UNLESS THE PORTION OF THE UNDERPAYMENT ATTRIBUTABLE TO SUBSTANTIAL ESTATE TAX VALUATION UNDERSTATEMENT IS GREATER THAN \$5,000.

13-1101.

(a) Except as otherwise provided in this section, an assessment of financial institution franchise tax [or], income tax, OR ESTATE TAX may not be made after 3 years from the later of:

(1) the date that the return is filed; or

(2) the date that the return is due.

(b) An assessment of financial institution franchise tax [or], income tax, OR ESTATE TAX may be made at any time if:

(1) a false return is filed with the intent to evade the tax;

(2) a willful attempt is made to evade the tax;

(3) a return is not filed as required under TITLE 7, Title 8, or Title 10 of this article;