REPUBLIC OF THE PHILIPPINES
DEPARTMENT OF FINANCE
**BUREAU OF INTERNAL REVENUE**
Quezon City

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| Republic Act (RA) No. 4726; Revenue Memorandum Order (RMO) No. 18-2009 |
| BIR Ruling No. 572-2018 |
| OT- 0616-2020 |
| OCT 28 2020 |

**ONE MIHO PLACE CONDOMINIUM CORPORATION**
1260 G. Masangkay Street
Tondo, Manila 1003

*Attention:* **JUNE T. YU**
*President*

Gentlemen:

This refers to your letter dated March 06, 2020 seeking for enlightenment regarding the ruling on the transfer of a parcel of land located at 1260 G. Masangkay St., Tondo Manila covered by Transfer Certificate of Title (TCT) No. [redacted] of the Registry of Deeds of Manila, through a Deed of Conveyance to be executed by E Bay Land Development Corporation in favor of One Miho Place Condominium Corporation.

In reply, please be informed that your request has been sufficiently addressed with the issuance of Revenue Memorandum Order (RMO) No. 18-2009 ("An Order Dispensing the Necessity of Securing a Ruling from the Bureau of Internal Revenue as a Requisite for the Issuance of CAR/TCL on the Conveyance of Land and Common Areas by the Real Estate Developer to the Condominium Corporation Organized in Accordance with the Provisions of Republic Act No. 4726 for the Purpose of Holding Title to and Managing and Maintaining the Land and the Common Areas for the Benefit of the Condominium Unit Owners, as well as Prescribing the Policies and Guidelines to be Observed in the Issuance of CAR/TCL in Respect Thereto") dated April 26, 2009. Inasmuch as your query falls within the ambit of RMO 18-2009, you are advised to comply with the requirements prescribed under the said Revenue Memorandum Order.

Very truly yours,

**CAESAR R. DULAY**
Commissioner of Internal Revenue

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