REPUBLIKA NG PILIPINAS
KAGAWARAN NG PANANALAPI
KAWANIHAN NG RENTAS INTERNAS
QUEZON CITY

January 15, 2007

REVENUE MEMORANDUM CIRCULAR NO. 3-2007

SUBJECT: **Publishing the Full text of Memorandum Order No. 233 dated December 11, 2006 issued by the President Gloria Macapagal-Arroyo Directing the Land Registration Authority, through the concerned Register of Deeds, to Annotate in the Transfer Certificate of Title the Serial Number of the Certificate Authorizing Registration issued by the Bureau of Internal Revenue, and Other Pertinent Details**

TO : **All Internal Revenue Officials, Employees and Others Concerned**

For the information and guidance of all internal revenue officers, employees and others concerned, quoted hereunder is the full text of Memorandum Order No. 233 issued by the President of the Philippines, directing the Land Registration Authority, through the concerned Register of Deeds, to annotate in the Transfer Certificate of Title the Serial Number of the Certificate Authorizing Registration issued by the Bureau of Internal Revenue, and other pertinent details as follows:

"MEMORANDUM ORDER NO. 233

DIRECTING THE LAND REGISTRATION AUTHORITY, THROUGH THE CONCERNED REGISTER OF DEEDS, TO ANNOTATE IN THE TRANSFER CERTIFICATE OF TITLE THE SERIAL NUMBER OF THE CERTIFICATE AUTHORIZING REGISTRATION ISSUED BY THE BUREAU OF INTERNAL REVENUE

WHEREAS, tax collection is always among the top priority measures of the State;

WHEREAS, tax collection in the transfer of real property, due to brisk turnover, is an important source of funding for the government;

WHEREAS, prior to registering any deed and acquiring a Transfer Certificate of Title, the Tax Reform Act of 1997 requires the payment of transfer taxes with the Bureau of Internal Revenue and tax clearance is manifested by a Certificate Authorizing Registration with a unique serial number;

WHEREAS, Presidential Decree No. 1529, or the "Property Registration Decree", provides that registered land shall be subject to such burdens and incidents as may arise by operation of law, such as payment of transfer taxes under the Tax Reform Act of 1997;

WHEREAS, Presidential Decree No. 1529 recognizes that such other burdens and incidents may be annotated in the Transfer Certificate of Title;

WHEREAS, requiring such annotation allows a system of verifying tax payments and, thus, ensure transfer tax payments by the taxpayer;

NOW, THEREFORE, I, GLORIA MACAPAGAL-ARROYO, President of the Republic of the Philippines, by virtue of the powers vested in me by law, do order:

Section 1. **Additional Annotation Requirement.** The Land Registration Authority, through the concerned Register of Deeds, is hereby directed to annotate in the Transfer Certificates of the Title the serial number of the Certificate Authorizing Registration (CAR) issued by the BIR, the date of its issuance, the Revenue District Office Number of the district office that issued the CAR, the name of the Revenue District Officer who signed the CAR and the taxes paid. This shall be an indispensable requirement prior to the issuance of a Transfer Certificate of Title by the Register of Deeds.

Section 2. **Objectives**. This additional annotation requirement shall allow the verification and back-checking of tax payments and shall ensure that transfer tax payments are paid as a precondition to issuance of title.

Section 3 **Scope.** The additional annotation requirement shall cover transfers of Original, Condominium, and Transfer Certificates of Title of real properties sought to be registered with the Register of Deeds.

Section 4. **Repealing Clause.** All executive issuance, rules and regulations or parts thereof, which are inconsistent with this Memorandum Order, are hereby repealed or modified accordingly.

Section 5. **Effectivity.** This Memorandum Order shall take effect fifteen (15) days after its publication in a national newspaper of general circulation.

Done in the City of Manila, this 11th day of December in the year of Our Lord, two thousand and six.

(Signature of President Gloria Macapagal-Arroyo affixed in the Original)

By the President:

(Original Signed)
EDUARDO R. ERMITA
Executive Secretary"

All revenue officials and employees are enjoined to give this Circular as wide publicity as possible.

(Original Signed)
JOSE MARIO C. BUÑAG
Commissioner of Internal Revenue