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

Republic Act (RA) No. 4726; Revenue Memorandum Order (RMO) No. 18-2009
BIR Ruling No. 570-2018
OT-0372-2020
JUL 03 2020

ROBINSONS LAND CORPORATION
12th Floor, Robinsons Cyberscape Alpha,
Sapphire and Garnet Roads,
Ortigas Center, Pasig City

Attention: **ATTY. JUAN ANTONIO M. EVANGELISTA**
AVP-Legal, AMD, Operations and Allied Services Departments

Gentlemen:

This refers to your letter dated May 31, 2018 requesting for the issuance of a Ruling exempting the conveyance of land and common areas from the payment of creditable withholding tax (CWT) and documentary stamp tax (DST), which are registered under the name of the real estate developer, Robinsons Land Corporation, in favor of Vimana Verde Residences Condominium Corporation and East of Galleria Condominium Corporation, condominium corporations established pursuant to the provision of Republic Act (RA) No. 4726, otherwise known as the "Condominium Act of the Philippines".

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 just comply with the requirements prescribed under the said RMO.

Very truly yours,

CAESAR R. DULAY
Commissioner of Internal Revenue

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