



13 NOVEMBER 2013

**TO : CEAP NATIONAL BOARD, CEAP MEMBER SCHOOLS,
AND SUPERINTENDENTS**

**RE : ADVISORY ON THE BIR'S
REVENUE MEMORANDUM ORDER NO. 20-2013**

The Catholic Educational Association of the Philippines (CEAP) maintains its position that its Member Schools are automatically exempt from tax under the law and that Revenue Memorandum Order (RMO) No. 20-2013, as amended by RMO No. 28-2013, invalidly restricts the tax exemption granted to non-stock non-profit religious and educational institutions. Accordingly, CEAP is preparing to pursue, on behalf of its Member Schools, the necessary judicial remedy to protect the constitutional rights of the Member Schools.

As a precautionary measure and as a precondition to the filing of the appropriate judicial remedy with the proper courts, CEAP is constrained to advise the Member Schools to **comply under protest** with RMO No. 20-2013. Please note, however, that such compliance by the Member Schools in the interim does not and will not undermine CEAP's position as it remains resolute that RMO No. 20-2013 adds illegal conditions to the tax-exempt status of non-stock non-profit religious and educational institutions.

Consistent with the foregoing, we recommend that all of CEAP's Member Schools **file, under protest**, with the appropriate BIR office the documents required by RMO No. 20-2013 on or before 31 December 2013. For your guidance, we attach with this advisory a primer on the requirements of RMO No. 20-2013.

If you want to know more about the judicial remedies that CEAP intends to pursue, kindly contact the CEAP Advocacy Officer, Mr. Anthony V. Coloma at ton.coloma@ceap.org.ph.