

**[BIR REVENUE MEMORANDUM ORDER NO. 34-92,
September 04, 1992]**

**LIFTING THE SUSPENSION OF AUDIT OF INCOME AND BUSINESS
TAX RETURNS FOR 1990 AND 1991**

The suspension of examinations and/or audits of internal revenue tax liabilities for 1990 and 1991 under Revenue Memorandum Order No. 23-92 is hereby lifted. The requirements of RMO No. 19-92, RMO No. 4-89, as amended by RMO No. 12-89, RMO No. 43-90, RMO No. 36-90 and RMO No. 23-92 should be strictly complied with by all of those concerned. The Assistant Commissioner (Assessment Service) shall conduct a management audit to ensure that the procedural requirements prescribed in the said RMOs are complied with and shall report the result of such management audit on a quarterly basis.

The audit should not be confined to the examination of the taxpayer's books of accounts and other records. Relevant information from sources external to the taxpayer's own accounting and other records should be gathered by accessing the records of persons with whom the taxpayer has transactions or other entities, such as the CB, BOC, etc., which may have data on the gross sales, receipts or income generated by the taxpayer.

Deficiency tax determinations should be based not only on mere disallowance of deductions but on findings of underdeclarations which are undeniably prevalent. The performance of the individual revenue officers will be evaluated through post-selective, post-audit review of reports submitted by them.

This Revenue Memorandum Order shall take effect immediately.

Adopted: 4 Sept. 1992

(SGD.) JOSE U. ONG
Commissioner of Internal Revenue

