January 18, 2021

CERTIFICATE OF TAX EXEMPTION NO. PSH-007-21

CERTIFICATE OF TAX EXEMPTION

TO ALL WHOM IT MAY CONCERN :

This certifies that the Deed of Absolute Sale (DOAS) with Donation and Acceptance executed by the Landowner in favor of the City Government of Quezon City over the parcels of land described below, to wit:

Date of Deed of Absolute Sale with Donation and Acceptance	Name of Vendor/ Donor	Transfer Certificate of Title Nos.	Area (Sq. m.)	Area Transferred (Sq. m.)	Location
December 9, 2020	Kanejin Corporation	N-218064	56,787	**(by sale)** 52,403	Brgy. Payatas, Quezon City
				(by donation) 4,384	
		N-218231	20,000	**(by sale)** 12,622	Brgy. Payatas, Quezon City
				(by donation) 7,378	
			Total	**76,787**	

which shall be used by the City Government of Quezon City intended for the development of a socialized housing project for the benefit of Quezon City Informal Settlers Families (ISFs), is **not subject** to capital gains tax/creditable withholding tax and donor's tax pursuant to Section 20 (d) (2) and (d) (5) of Republic Act (RA) No. 7279, as amended by RA No. 10884 (Balanced Housing Development Program Amendments) dated July 17, 2016. The transaction is, however, **subject** to **documentary stamp tax** under Section 196 of the National Internal Revenue Code of 1997, as amended, based on the actual consideration of the property transferred considering that one of the parties is the Government.

It is, however, understood that this CTE is never intended, and shall not be construed, as giving authority to concerned Register of Deeds to effect transfer of the land titles in the

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name of the buyer/donee without the necessary Certificate Authorizing Registration (CAR) issued by this Bureau. In this regard, this CTE, together with the documentary requirements provided under Revenue Memorandum Order (RMO) No. 15-2003, shall be presented to the Revenue District Office (RDO) concerned in order for the latter to issue the CAR.

Upon application for exemption, a lien on the titles of the lands, shall be annotated by the Register of Deeds having jurisdiction over the properties, to the effect that the same are to be applied or are being applied to a socialized housing project pursuant to RA 7279.

This Certificate of Tax Exemption is being issued on the basis of the facts and documents as represented and submitted. However, if upon investigation, the BIR ascertains that the facts are different, then this Certificate shall be considered null and void.

Issued this 18th day of January, 2021.

(SGD.) CAESAR R. DULAY
Commissioner of Internal Revenue

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