January 27, 2021

CERTIFICATE OF TAX EXEMPTION NO. JV-009-21

CERTIFICATE OF TAX EXEMPTION

TO ALL WHOM IT MAY CONCERN :

This certifies that the Deed of Absolute Sale (DOAS) executed by the Landowners in favor of the Municipal Government of San Remigio, Cebu over the parcel of land described below, to wit:

Date of Deed of Absolute Sale	Name of Landowners/ Sellers	Transfer Certificate of Title No.	Area (Sq.m.)	Total Area Transferred (Sq. m.)	Location
December 5, 2019	AAA and BBB	TCT No. 102-2019000168	53,227	46,408	Brgy. Lawis San Remigio, Cebu

which shall be used for the **Lawis Residences Housing Project**, with 617 housing units, located in Brgy. Lawis, San Remigio, Cebu, a socialized housing project under the National Housing Authority's (NHA) Yolanda Permanent Housing Program, to be undertaken by **THREE W BUILDERS/TAGUM BUILDERS/MRDG CONSTRUCTION SERVICES-JOINT VENTURE**, are **not subject** to creditable withholding tax and capital gains tax pursuant to Section 20 of Republic Act (RA) No. 7279 and value-added tax pursuant to Section 109 (1) (P) of the Tax Code of 1997, as amended.

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 name of the buyer 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 title of the land, shall be annotated by the Register of Deeds having jurisdiction over the property, to the effect that the same is to be applied or is being applied to a socialized housing project pursuant to RA 7279.

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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 27th day of January, 2021.

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

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