February 26, 2021

CERTIFICATE OF TAX EXEMPTION NO. CMP-044-21

CERTIFICATE OF TAX EXEMPTION
issued to

Name of Seller	TIN	Address
STONEHENGE LEASING AND FINANCE CORPORATION	000-000-000-000	Rm. 402 EBC Bldg. 262 Juan Luna St., Brgy. 287 Zone 27, Binondo, Manila

-and-

Name of Homeowners Association (HOA)	TIN	Address
BRILLIANT STONE VILLE HOMEOWNERS ASSOCIATION, INC.	000-000-000-000	Bagumbong Dulo, Brgy. 171, Caloocan City

This certifies that the Deed of Absolute Sale entered by the Seller and the HOA, dated December 27, 2019, over the parcel of land described below, to wit:

Transfer Certificate of Title No.	Total Area (sq.m.)	Transferred (sq.m.)	Area of CMP (sq.m.)	Location
001-2019005489	12,437	12,437	12,437	Bagumbong Dulo, Brgy. 171, Caloocan City

being a Community Mortgage Program (CMP), is not **subject** to capital gains tax pursuant to Section 32 (b) of Republic Act (RA) No. 7279, or the Urban Development and Housing Act of 1992. The transaction is, however, **subject** to **documentary stamp tax** under Section 196 of the National Internal Revenue Code of 1997 (Tax Code), as amended.

It is, however, understood that this Certificate of Tax Exemption is never intended and shall not be construed as giving authority to the concerned Register of Deeds to effect transfer of the land title in the name of the buyer without the necessary Certificate of Authority to Register issued by this Bureau. In this regard, this Certificate shall be presented to the Revenue District Office (RDO) concerned in order for the latter to issue the Certificate

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Authorizing Registration (CAR). The CAR shall only be issued after the submission of the requirements provided under Revenue Memorandum Order (RMO) No. 15-2003.

The Bureau of Internal Revenue (BIR) shall conduct verification and post-audit that the actual occupants of the property transferred under the CMP are qualified beneficiaries and therefore, the seller is entitled to exemption from capital gains tax or income tax imposed under Sections 24 (D) (1) and/or 27 (D) (5) of the Tax Code, as amended.

This Certificate 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 26th day of February, 2021.

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

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