REPUBLIC OF THE PHILIPPINES
DEPARTMENT OF FINANCE
BUREAU OF INTERNAL REVENUE
Quezon City

Certificate of Tax Exemption No:
CNP-123-2021

CERTIFICATE OF TAX EXEMPTION

TO ALL WHOM IT MAY CONCERN:

This certifies that the Deed of Absolute Sale (DOAS) executed by the Heirs of Andres Horteza and Luciana Parantar Horteza in favor of the Plain View San Isidro Bunawan Association, Inc. over a parcel of land described below, to wit:

Date of DOAS	Name of Sellers	Transfer Certificate of Title	Aggregate Area (sq. m.)	Area Transferred (sq. m.)	Location
January 28, 2002	Heirs of Andres Horteza and Luciana Parantar Horteza[1]		12,430	12,430	Brgy. San Isidro, Bunawan Davao City

which shall be used for the establishment of a socialized housing project[2] under the Urban Land Reform Program (ULRP) of the City Government of Davao for the members of the Plain View San Isidro Bunawan Association, Inc., a project beneficiary of the ULRP who has availed a financial assistance thru a loan under the ULRP which was financed by the City Government of Davao, is not subject to capital gains tax (CGT) pursuant to Section 20 of Republic Act (RA) No. 7279, as amended by RA No. 10884 (Balanced Housing Development Program Amendments) dated July 17, 2016, or withholding tax under Revenue Regulations (RR) No. 2-98, as amended.

However, the sale is subject to documentary stamp tax (DST) imposed under Section 196 of the National Internal Revenue Code (Tax Code) of 1997, as amended, based on the consideration contracted to be paid for such realty or its fair market value determined in accordance with Section 6 (E) of the same Code, whichever is higher.

It is understood that this Certificate of Tax Exemption (CTE) 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 Plain View San Isidro Bunawan Association, Inc. without the Certificate Authorizing Registration (CAR) issued by this Bureau. In this regard, this CTE shall be presented to the Revenue District Office concerned in order for the latter to issue the CAR after submission of the requirements provided under Revenue Memorandum Order (RMO) No. 15-2003, as amended.

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 No. 7279.

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[1] The tax exemption does not cover estate tax due, if any, on the transfer of the property from the deceased landowners (Andres Horteza and Luciana Parantar Horteza) to their respective heirs.

[2] Per Certification dated January 21, 2002 issued by the Office of the City Mayor, City of Davao, Sangguniang Panlungsod Resolution No. 2171, Series of 2000, approved the purchase of the said property

PLAIN VIEW SAN ISIDRO BUNAWAN ASSOCIATION, INC.

CTE No. [illegible]
Date issued APR [illegible]

Notwithstanding the foregoing, the Bureau of Internal Revenue shall conduct verification and post-audit that the actual occupants of the property transferred under the ULRP are qualified members-beneficiaries and therefore, the sellers are entitled to exemption from capital gains tax or income tax imposed under the Tax Code of 1997, as amended.

This CTE 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 _____ day of APR [illegible], _____.

CAESAR R. DULAY
Commissioner of Internal Revenue

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