May 17, 2021

CERTIFICATE OF TAX EXEMPTION NO. CMP-157-21

CERTIFICATE OF TAX EXEMPTION

TO ALL WHOM IT MAY CONCERN :

This certifies that the Deed of Absolute Sale (DOAS) executed by the Landowner in favor of the City Government of Manila over the parcel of land described below, to wit:

Date of Deed of Absolute Sale [1]	Name of Vendor/ Donor	Transfer Certificate of Title No.	Area (Sq.m.)	Area Transferred (Sq.m.)	Location
February 4, 2021	AAA		6,003	6,003	Sta. Ana, City of Manila

which shall be used by the City Government of Manila intended for distribution and resale at cost to the actual and *bonafide* occupants of the lot under its Socialized Housing Program and Land for the Landless Program, is **not subject** to capital gains tax pursuant to Section 20 (d) (2) 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 title 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 17th day of May, 2021.

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

Footnotes

1. Special Power of Attorney dated January 25, 2021, was granted to BBB to execute the Deed of Absolute Sale on behalf of the landowner.

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