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

Certificate of Tax Exemption No.
CMP-164-2022

CERTIFICATE OF TAX EXEMPTION

TO ALL WHOM IT MAY CONCERN:

This certifies that the Deed of Absolute Sale dated August 6, 2020, entered into by and between:

Name of Seller[1]	**TIN**	**Address**
Josefina D. Nacpil		Ph-5 Blk 19 Lot 2 Dizon Estate San Agustin, San Fernando Pampanga

-and-

Name of Homeowners Association (HOA)	**TIN**	**Address**
TULONG-TULONG CMP HOMEOWNER'S ASSOCIATION, INC.		Purok 7, San Luis Extension Baguio City 2600

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**
	722	574	574	Purok 7, San Luis Extension, Baguio 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, as amended by RA No. 10884. The transaction is, however, **subject** to **documentary stamp tax** under Section 196 of the National Internal Revenue Code (Tax Code) of 1997, as amended.

It is, however, 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 the buyer without the necessary Certificate Authorizing Registration (CAR) 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 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 of 1997, as amended.

[1] Special Power of Attorney dated August 9, 2019 was granted to Lilia E. Manansala to execute the Deed of Absolute Sale on behalf of the landowner for the sale of the property identified and described in TCT No.

CTE No. CMP-164-2022
Date Issued APR 20 2022

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 20 2022, _____.

CAESAR R. DULAY
Commissioner of Internal Revenue

K-1-JAC

By:
MARISSA D. CABREROS
Deputy Commissioner
Legal Group
Officer-in-Charge

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