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

Certificate of Tax Exemption No:
PSH-175-2022

CERTIFICATE OF TAX EXEMPTION

TO ALL WHOM IT MAY CONCERN:

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

Date of Deed of Absolute Sale	Name of Landowner/s Seller/s[1]	Transfer Certificate of Title No.	Area (Sq.m.)	Area Transferred (Sq. m.)	Location
June 11, 2021	Ma. Nieves Borja-Samia		2,063.50	425.50	Bambang Street, Tondo, Manila

which shall be used for awarding to qualified actual and *bonafide* occupants of the lot under the Socialized Housing Program and Land for the Landless Program of the City of Manila, 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 Certificate of Tax Exemption (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.

[1] This CTE does not include exemption from estate tax, if any, on the transfer of TCT Nc rom its registered owners, Antonio M. Samia and Nieves Onrubia, to their respective heirs.

CTE No. PSH-[illegible]-2022
Date issued APR 21 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 21 2022, _____.

CAESAR R. DULAY
Commissioner of Internal Revenue

K-1-JAC

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

0154