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

Certificate of Tax Exemption No.
CMP 328-2022

CERTIFICATE OF TAX EXEMPTION

TO ALL WHOM IT MAY CONCERN:

This certifies that the Deed of Absolute Sale dated October 15, 2020, entered into by and between:

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

-and-

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

over the parcel of land described below, to wit:

Transfer Certificate of Title Nos.	Total Area (sq.m.)	Transferred (sq.m.)	Area of CMP (sq.m.)	Location
	22,401	20,889	20,889	

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.

CTE No. CMP-325-2022
Date Issued JUN 29 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 29 day of JUN 2022, _____.

CAESAR R. DULAY
Commissioner of Internal Revenue

By: 052168

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