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

Certificate of Tax Exemption No.
CMP-329-2022

CERTIFICATE OF TAX EXEMPTION

TO ALL WHOM IT MAY CONCERN:

This certifies that the Deed of Absolute Sale dated November 28, 2018, entered into by and between:

Name of Sellers	TIN	Address
Rene E. Cristobal married to Elizabeth B. Cristobal[1]		

-and-

Name of Homeowners Association (HOA)	TIN	Address
ST. PAUL HOMEOWNERS ASSOCIATION, INC.		Purok 3 Extension Lanton Brgy. Apopong Gen. Santos City 9500

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
	42,372	30,133	30,133	

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] Affidavit of Marital Consent was executed by Elizabeth B Cristobal on December 6, 2018 granting her consent to the Deed of Sale of a portion of the property covered by TCT No. executed by her husband Rene E. Cristobal in favor of St. Paul Homeowners Association, Inc.

CTE No. OMP-329-2022
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 _____day of JUN 29 2022, _____.

CAESAR R. DULAY
Commissioner of Internal Revenue

K-1-JAC

052155