REPUBLIC OF THE PHILIPPINES
DEPARTMENT OF FINANCE
BUREAU OF INTERNAL REVENUE

Certificate of Tax Exemption No.
CMP 3 6 7 - 2 0 2 2

CERTIFICATE OF TAX EXEMPTION

TO ALL WHOM IT MAY CONCERN:

This certifies that the Deed of Absolute Sale dated July 7, 2020, entered into by and between:

Name of Sellers[1]	TIN	Address
Jenny T. Li married to Beini Li		

-and-

Name of Homeowners Association (HOA)	TIN	Address
SAN JUAN HOMEOWNERS ASSOCIATION, INC.		Brgy. Manambulan, Tugbok District, Davao City 8000

over the parcels of land described below, to wit:

Transfer Certificate of Title Nos.	Total Area (sq.m.)	Transferred (sq.m.)	Area of CMP (sq.m.)	Location

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.

[1] Special Power of Attorney dated November 29, 2019, was granted to Susana B. Basuel to execute the Deed of Absolute Sale on behalf of the landowners for the sale of the properties identified and described in TCT Nos. 146-2014072653, 146-2014072654 and 146-2014072655.

CTE No. CMP- 367 - 2022
Date Issued AUG 22 2022

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.

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 AUG 22 2022.

LILIA CATRIS GUILLERMO
Commissioner of Internal Revenue

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