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

Certificate of Tax Exemption No:
033-2017
2-3-2017

CERTIFICATE OF TAX EXEMPTION

This certifies that **CSE BUILDERS/EDDMARI CONSTRUCTION AND TRADING-JOINT VENTURE,** an entity engaged by the National Housing Authority (NHA), is exempt from project-related income taxes, creditable withholding tax and VAT, pursuant to Section 20 (d)(1) and (3) of Republic Act No. 7279, on its income received directly in connection with the construction/development of socialized housing units under the NHA's Yolanda Permanent Housing Program, to wit:

Project Name	Location	No. of Socialized Housing Units subject of tax exemption
Greenpark 1	Brgy. Sawa, Basey, Samar	1,000

However, the purchases of goods/articles by **CSE BUILDERS/EDDMARI CONSTRUCTION AND TRADING-JOINT VENTURE** shall be subject to VAT, even if the said purchases are to be used for the socialized housing project, since VAT is an indirect tax which can be passed on by the seller of the goods/services. It shall be understood that **CSE BUILDERS/EDDMARI CONSTRUCTION AND TRADING-JOINT VENTURE** must issue non-VAT official receipts on its gross receipts from the said socialized housing project.

Moreover, the Deeds of Absolute Sale entered by the Landowners and the NHA over the parcels of land described below, to wit:

Date	Name of Landowner	Original Certificate of Title	Area (sq.m.)	Transferred (sq.m.)
September 22, 2016	Sonia Cajepe		1,205	1,205
September 22, 2016	Heirs of Wenceslao Ocop (Remedios M. Ocop, Reina O. Aberia and Rosalyn Ocop)		8,117	8,117
September 22, 2016	Rafael Padoc		2,895	2,895
September 22, 2016	Feves T. Macasaet		5,296	5,296
September 22, 2016	Heirs of Matias Moreto, represented by Leonesa Salera		2,665	2,665
September 22, 2016	Heirs of George Ragoro (Dominador Ragoro, Gonzalo Ragoro, represented by Virginia Ragoro)		4,882	4,882
September 22, 2016	Heirs of Wenceslao Ocop (Remedios M. Ocop, Reina O. Aberia and Rosalyn Ocop)		14,671	14,671

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September 22, 2016	Heirs of Protacio Delovino (Raquel D. Malimas, Ma. Corazon D. Marabut and Mansueto M. Delovino)		4,862	4,862
September 22, 2016	Diocleciano Moreto (married to Linda C. Moreto)		6,256	6,256
September 22, 2016	Marlon M. Moreto (married to Joshepine C. Moreto)		5,205	5,205
September 22, 2016	Cresencia Labuac (married to Jesus Labuac)		6,101	6,101
September 22, 2016	Igmedio Malibago		3,186	3,186
September 22, 2016	Lourdes Baclle		4,621	4,621

which will be used for the above mentioned socialized housing projects, are **not subject** to **income tax/capital gains tax/expanded withholding tax, documentary stamp tax and value-added tax (VAT)** pursuant to Sectiond 19 and 20 of Republic Act (RA) No. 7279 and Section 109 (1) (P) of the Tax Code of 1997, as amended[1].

It is, however, understood that this CTE is never intended and shall not be construed as giving authority to the concerned Register of Deeds to effect transfer of the land titles in the name of the buyer without the necessary certificate of authority to register issued by this Bureau. In this regard, this CTE shall be presented to the Revenue District Office (RDO) concerned in order for the latter to issue the Certificate Authorizing Registration (CAR). The CAR shall only be issued after the submission of the requirements provided under RMO No. 15-2003.

Upon application for exemption, a lien on the titles of the lands shall be annotated by the Register of Deeds having jurisdiction over the properties, to the effect that the same are to be applied or are being applied to socialized housing project pursuant to RA 7279.

This Certificate of Tax Exemption 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 FEB 03 2017.

CAESAR R. DULAY
Commissioner of Internal Revenue

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[1] The tax exemption does not cover estate tax due on the transfer of the properties from deceased landowners to their respective heirs.