January 9, 2019

CERTIFICATE OF TAX EXEMPTION NO. 043-19

CERTIFICATE OF TAX EXEMPTION

TO ALL WHOM IT MAY CONCERN :

This certifies that **MRRM TRADING & CONSTRUCTION** with Taxpayers Identification Number (TIN) 000-000-000-000, a private entity engaged by the National Housing Authority (NHA), is exempt from project-related income taxes, creditable withholding tax and value added tax (VAT), pursuant to Section 20 (d) (1) and (3) of Republic Act (RA) No. 7279, on its income received directly in connection with the construction/development of socialized housing units under the National Housing Authority (NHA)'s Yolanda Permanent Housing Program, to wit:

Date of Notice of Award	Date of Contract Agreement	Contract Price	Project Name	Location	No. of Socialized Housing Units subject of tax exemption
June 20, 2016	September 22, 2016	P_____	Almeria Housing Project Site 2	Brgy. Jamorawon, Almeria, Biliran	405 units

However, the purchases of goods/articles by **MRRM TRADING & CONSTRUCTION** 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 **MRRM TRADING & CONSTRUCTION** must issue VAT-exempt official receipts on its gross receipts from the said socialized housing project.

Moreover, the Deeds of Absolute Sale executed by the Landowners in favor of the NHA over the parcels of land described below, to wit:

Date of the Deeds of Absolute Sale	Name of Landowners	Transfer Certificate of Title (TCT) No.	Area (Sq. m.)	Area Transferred (Sq. m.)	Location
Sept. 20, 2016 [1] Oct. 17, 2016 [2]	AA	TC-3805	17,559	6,394	Brgy. Jamorawon, Almeria, Biliran

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Sept. 20, 2016 [3] Oct. 17, 2016 [4]	Spouses BBB and CCC	TC-3806	17,560	6,661	Brgy. Jamorawon, Almeria, Biliran
Sept. 20, 2016 [5] Oct. 17, 2016 [6]	Spouses DDD and EEE	TC-3807	17,559	8,944	Brgy. Jamorawon, Almeria, Biliran
Sept. 20, 2016 [7] Oct. 17, 2016 [8]	Spouses FFF and GGG	TC-3808	17,560	9,830	Brgy. Jamorawon, Almeria, Biliran

which shall be used for the above-mentioned socialized housing project, are not subject to capital gains tax (CGT) and documentary stamp tax (DST) pursuant to Sections 19 and 20 of RA No. 7279.

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 (RD) to effect transfer of the land titles in the name of the buyer without the necessary Certificate Authorizing Registration (CAR) 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 CAR.

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 9th day of January, 2019.

(SGD.) CAESAR R. DULAY
Commissioner of Internal Revenue

Footnotes

1. Date acknowledged by AAA.
2. Date acknowledged by Marcelino Escalada, Jr. of the NHA.
3. Date acknowledged by Spouses BBB and CCC.
4. Date acknowledged by Marcelino Escalada, Jr. of the NHA.
5. Date acknowledged by Spouses DDD and EEE.
6. Date acknowledged by Marcelino Escalada, Jr. of the NHA.
7. Date acknowledged by Spouses FFF and GGG.
8. Date acknowledged by Marcelino Escalada, Jr. of the NHA.

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