REPUBLIC OF THE PHILIPPINES
DEPARTMENT OF FINANCE
BUREAU OF INTERNAL REVENUE

Certificate of Tax Exemption No.
046-2017

CERTIFICATE OF TAX EXEMPTION
issued to

Name of Seller	TIN	Address
Menchaca Integrated Agricultural Corporation	[redacted]	Hda. Refugio, Calatrava, Negros Occidental

-and-

Name of Homeowners Association (HOA)	TIN	Address
St. John Village Homeowners Association, Inc.	[redacted]	Sitio Paraiso, Brgy. Refugio Calatrava, Negros Occidental

This certifies that the Deed of Absolute Sale entered by the Seller and the HOA dated September 17, 2015 over a parcel of land described below, to wit;

Transfer Certificate of Title	Area (sq.m.)	Transferred (sq.m.)	Area of CMP (sq.m.)	Location
[redacted]	28,766	27,711.72	27.711.72	Sitio Paraiso, Brgy. Refugio Calatrava, Negros Occidental

being a Community Mortgage Program (CMP)[1], is **not subject** to income tax/capital gains tax/expanded withholding tax and value-added tax pursuant to Section 32 (b) of RA No. 7279 and Section 109 (1) (P) of the Tax Code of 1997, as amended. The transaction is, however, **subject** to **documentary stamp tax** under Section 196 of the same Code.

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.

The Bureau of Internal Revenue shall conduct verification and post-audit that the actual occupants of the property transferred under the CMP are qualified beneficiaries and therefore, the sellers are entitled to exemption from capital gains tax or income tax imposed under Secs. 24 (D)(1) and/or 27 (D)(5) the Tax Code of 1997, as amended.

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 09 2017.

CAESAR R. DULAY
Commissioner of Internal Revenue

K-1-JRC

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[1] Shall be proportionately distributed to the association's qualified member-beneficiaries (See Annex)