REPUBLIC OF THE PHILIPPINES
DEPARTMENT OF FINANCE
BUREAU OF INTERNAL REVENUE

Certificate of Tax Exemption No.
096-2017

CERTIFICATE OF TAX EXEMPTION

issued to

Name of Seller	TIN	Address
VRC Realty Corporation		4th Flr., Saville Bldg., 8728 Paseo de Roxas, Makati City

-and-

Name of Homeowners Association (HOA)	TIN	Address
Aratiles Homeowners' Association, Inc. Ph. II		Brgy. B.F. Homes, Paranaque City

This certifies that the Deed of Absolute Sale entered by the Seller and the HOA dated December 15, 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
	3,247	3,126	3,126	Villongco Avenue, Brgy. B.F. Homes, Paranaque City

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 title 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 seller is 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 _____, _____.

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)