July 4, 2018

CERTIFICATE OF TAX EXEMPTION NO. 1045-18

CERTIFICATE OF TAX EXEMPTION

TO ALL WHOM IT MAY CONCERN :

This certifies that the Deed of Absolute Sale dated June 10, 2016, entered into by and between:

Name of Sellers/Landowners	TIN	Address
G.B. Francisco, Inc.	000-000-000	7th Floor, Doña Aurora Bldg., G. Tolentino cor. España Streets, Sampaloc, Manila

-and-

Name of Homeowners Association (HOA)	TIN	Address
Ugnayan Saranay Homeowner's Association, Inc. Phase I	000-000-000	Saranay Phase I, Brgy. 171, Bagumbong, Caloocan City

over two (2) parcels of land described below, to wit:

Transfer Certificate of Title (TCT) No.	Area (sq. m.)	Transferred (sq. m.)	Area of CMP (sq. m.)	Location
001-2014001207	6,994	5,902	5,902	Saranay St., Bagumbong, Caloocan City

being a Community Mortgage Program (CMP), [1] is **not subject** to capital gains tax and value-added tax (VAT) pursuant to Section 32 (b) of Republic Act (RA) No. 7279 and Section 109 (1) (P) of the National Internal Revenue Code of 1997, as amended. However, the transaction is **subject** to **documentary stamp tax (DST)** under Section 196 of the same Code.

It is, however, understood that this Certificate of Tax Exemption is never intended

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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 Certificate 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 Revenue Memorandum Order (RMO) No. 15-2003.

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 National Internal Revenue Code of 1997, as amended.

This Certificate 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 4th day of July, 2018.

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

Footnotes

1. Shall be proportionately distributed to the association's qualified member-beneficiaries.

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