July 16, 2018

CERTIFICATE OF TAX EXEMPTION NO. 1079-18

CERTIFICATE OF TAX EXEMPTION

TO ALL WHOM IT MAY CONCERN :

This certifies that **E.M. CUERPO, INC.** (TIN: 000-000-000-000), an 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 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:

Date of Notice of Award	Date of Contract Agreement	Contract Price (Php)	Project Name	Location	No. of Socialized Housing Units subject of tax exemption
June 15, 2017	Nov. 24, 2017	P_____	Gogo People's Village Site 2	Brgy. Gogo Estancia Site 2, Iloilo	783

However, the purchases of goods/articles by **E.M. CUERPO, INC.** 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 **E.M. CUERPO, INC.** must issue VAT-Exempt official receipts on its gross receipts from the said socialized housing project.

Moreover, the Deed of Absolute Sale/Unilateral Sale Executed by the Landowners in favor of the NHA over the parcels of land described below, to wit:

Date of Deed of Absolute Sale	Name of Landowners/Sellers [1]	Original Certificate of Title No.	Area (Sq. m.)	Area Transferred (Sq. m.)	Location
March 27, 2018	AAA and BBB	F-46385	33,555	30,649	Brgy. Gogo, Estancia, Iloilo
March 27, 2018	Spouses CCC and DDD	F-46381	23,322	23,218	Brgy. Gogo, Estancia, Iloilo

which shall be used for the above-mentioned socialized housing project, is not subject to capital gains tax and documentary stamp tax under Sections 19 and 20 of Republic Act

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(RA) No. 7279.

It is, however, understood that this CTE is never intended, and shall not be construed, as giving authority to concerned Register of Deeds 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 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 16th day of July, 2018.

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

Footnotes

1. Special Powers of Attorney both dated March 16, 2017, were granted to EEE to execute the Deeds of Absolute Sale on behalf of the landowners.

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