October 12, 2018

CERTIFICATE OF TAX EXEMPTION NO. 1247-18

CERTIFICATE OF TAX EXEMPTION

This certifies that the Deed of Absolute Sale (DOAS) executed by the **Heirs** [1] **of AAA** and the **National Housing Authority (NHA)** over the parcel of land described below, to wit:

Date of DOAS	Name of Landowner	Original Certificate of Title No.	Aggregate Area (sq.m.)	Area Transferred	Location of Property/ies
May 3, 2018	AAA [2]	C-3067	47,310	47,310	Brgy. Panugnawan, Medellin, Cebu

which shall be used for the socialized housing project of the NHA under its Yolanda Permanent Housing Program located in Sitio 117 Km., Panugnawan, Medellin, Cebu, consisting of **569** units, is **not subject** to **capital gains tax/creditable withholding tax** pursuant to Section 20 of Republic Act (RA) No. 7279. Moreover, the Contract for the Procurement of Fully Developed Lots and Completed Housing Units (569 Units) dated August 14, 2018 being Undertaken by **A5R Dynamics Construction Corporation** is likewise exempt from income tax/creditable withholding tax.

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 to effect transfer of the land titles in the name of the NHA without the Certificate Authorizing Registration (CAR) issued by this Bureau. In this regard, this CTE, together with the documentary requirements provided under RMO No. 15-2003, shall be presented to the Revenue District Office (RDO) concerned in order for the latter to issue the CAR.

Upon application for exemption, a lien on the titles of the lands shall be annotated by the Register of Deeds having jurisdiction over the properties, to the effect that the same are to be applied or are being applied to a socialized housing project pursuant to RA 7279.

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

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that the facts are different, then this Certificate shall be considered null and void.

Issued this 12th day of October, 2018.

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

Footnotes

1. Namely, BBB, CCC, DDD, EEE, FFF, GGG, HHH, III, JJJ and KKK and the Heirs of LLL.
2. The estate tax due on the Estate of AAA, if any, is not covered by this Certificate of Tax Exemption.

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