October 12, 2018

CERTIFICATE OF TAX EXEMPTION NO. 1254-18

CERTIFICATE OF TAX EXEMPTION
issued to

Name of Seller	TIN	Address
THE MANILA REMNANT CO., INC.	000-000-000-000	Rm. 608 VGP Center, 6772 Ayala Ave., Makati City 1226

-and-

Name of Homeowners Association (HOA)	TIN	Address
IPIL-IPIL HOMEOWNERS' ASSOCIATION, INC. (PAYATAS) PH I	000-000-000-000	Pili St., Group I, Area B, Payatas, Quezon City 1120

This certifies that the Deed of Absolute Sale entered by the Seller and the HOA dated December 19, 2016, over the parcels of land described below, to wit:

Transfer Certificate of Title	Area (sq.m.)	Transferred (sq.m.)	Area of CMP (sq.m.)	Location
N-322346 N-322349	2,287 7,769	2,287 7,509	2,287 7,509	Brgy. of Payatas, Quezon City
TOTAL	**10,056**	**9,796**	**9,796**	

being a Community Mortgage Program (CMP), [1] is **not subject** to capital gains tax pursuant to Section 32 (b) of Republic Act (RA) No. 7279, or the Urban Development and Housing Act of 1992. The transaction is, however, **subject** to **documentary stamp tax** under Section 196 of the same Code.

It is, however, understood that this Certificate of Tax Exemption 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 Certificate shall be presented

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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 properties 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) 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 12th day of October, 2018.

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

Footnotes

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

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