October 12, 2018

CERTIFICATE OF TAX EXEMPTION NO. 1255-18

CERTIFICATE OF TAX EXEMPTION
issued to

Name of Seller	TIN	Address
MARTIAN STEEL CORP.	000-000-000-000	Elizalde Rd., Napindan, Taguig City 1638 212
SUNNY REALTY CORP.	000-000-000-000	Regina Bldg., Escolta St., Binondo, Manila 1006

-and-

Name of Homeowners Association (HOA)	TIN	Address
EMMAR VILLE NAGPAYONG HOMEOWNERS ASSOCIATION, INC.	000-000-000-000	Blk. 4, Lot 19, Talisay St., Nagpayong II, Pinagbuhatan, Pasig City 1602

This certifies that the Deed of Absolute Sale entered by the Sellers and the HOA dated February 28, 2018, over the parcels of land described below, to wit:

Transfer Certificate of Title	Total Area (sq.m.)	Transferred (sq.m.)	Area of CMP (sq.m.)	Location
164-2014001842	4,488	4,447	4,447	Barrio Ibayo-Napindan, Taguig City 1638
164-2015000044	39,216	2,517	2,517	

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 1997 Tax Code, as amended.

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

Copyright 2020 CD Technologies Asia, Inc.

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 1997 Tax Code, 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).

Copyright 2020 CD Technologies Asia, Inc.