December 20, 2018

CERTIFICATE OF TAX EXEMPTION NO. 1445-18

CERTIFICATE OF TAX EXEMPTION

TO ALL WHOM IT MAY CONCERN :

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

Date	Name of Landowners	Original Certificate of Title (OCT)	Area (sq. m.)	Area Transferred (sq. m.)	Location
February 16, 2015	**Heirs of Spouses AAA and BBB**, namely: (1) CCC, (2) DDD, (3) EEE, (4) FFF, (5) GGG, (6) HHH, (7) III, and the **Heirs of JJJ**, namely: (1) KKK, (2) LLL, (3) MMM, (4) NNN, (5) OOO, and (6) PPP	OCT No. N-2285	61,781 [1]	30,601	Brgy. Sacme, Tanauan, Leyte

which shall be used for the socialized housing project of the NHA known as **Mont. Eagle Ville Subdivision** under its Yolanda Permanent Housing Program, consisting of 412 housing units, located at Brgy. Sacme, Tanauan, Leyte, is **not subject** to **capital gains tax (CGT)/creditable withholding tax (CWT) and documentary stamp tax (DST)** pursuant to Sections 19 and 20 of Republic Act (RA) No. 7279, as amended by RA No. 10884 (Balanced Housing Development Program Amendments) dated July 17, 2016. Moreover, **Eaglerock Construction and Development Corporation** [2] **/B.C. Cuerpo Construction Corporation** [3] **— Joint Venture**, the entity engaged [4] by the NHA for the procurement of house and lot packages at **Mont. Eagle Ville Subdivision** consisting of 412 housing units, located at Brgy. Sacme, Tanauan, Leyte, is likewise **exempt** [5] from **project-related income taxes, CWT, and value added tax (VAT)** on its income received directly in connection with the said socialized housing project, pursuant to Section 20 (d) (1) and (3) of RA No. 7279, as amended.

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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 (RD) to effect transfer of the land titles in the name of the NHA without the necessary Certificate Authorizing Registration (CAR) issued by this Bureau. In this regard, this CTE, together with the documentary requirements provided under Revenue Memorandum Order (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 concerned RD 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 No. 7279, as amended.

This CTE 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 20th day of December, 2018.

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

Footnotes

1. Total area of Lot 1, plan Pau-254379, LR Case No. N-201, LRC. Record No. N-44478 containing an area of 47,803 square meters, more or less, and Lot 2, plan Pau-254379, LR Case No. N-201, LRC. Record No. N-44478 containing an area of 13,978 square meters, more or less.
2. TIN: 000-000-000-000.
3. TIN: 000-000-000-000.
4. Contract for the Procurement of House and Lot Packages dated December 18, 2014.
5. The tax exemption does not cover estate tax due, if any, on the transfer of the properties from deceased landowners (Spouses AAA and BBB, and JJJ) to their respective heirs.

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