February 22, 2019

CERTIFICATE OF TAX EXEMPTION NO. 180-19

CERTIFICATE OF TAX EXEMPTION

TO ALL WHOM IT MAY CONCERN :

This certifies that the Deed of Absolute Sale dated December 22, 2017, entered into by and between:

Name of Seller/Landowner	TIN	Address
LNC (SPV-AMC) CORP.	000-000-000-000	1410, 14/F, Net Cube Center, 3rd Avenue Cor. 30th St., E-Square, Crescent Park West, Bonifacio Global City, Taguig City 1634

-and-

Name of Homeowners Association (HOA)	TIN	Address
Ocean View Homeowners Association, Inc.	000-000-000-000	Ilang, Bunawan, Davao City 8000

over a parcel of land described below, to wit:

Transfer Certificate of Title (TCT) No.	Total Area (sq. m.)	Area Transferred (sq. m.)	Area of CMP (sq. m.)	Location
146-2015011197	77,781	24,769	24,769	Barrio of Ilang, Davao City

being a Community Mortgage Program (CMP), [1] is **not subject** to capital gains tax and value-added tax (VAT) pursuant to Section 32 (b) of Republic Act (RA) No. 7279, as amended by RA No. 10884 (Balanced Housing Development Program Amendments) dated

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July 17, 2016, and Section 109 (1) (P) of the National Internal Revenue Code of 1997, as amended. However, the transaction is **subject** to **documentary stamp tax (DST)** 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 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) 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 22nd day of February, 2019.

(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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