January 18, 2018

CERTIFICATE OF TAX EXEMPTION NO. 023-18

CERTIFICATE OF TAX EXEMPTION

TO ALL WHOM IT MAY CONCERN :

This certifies that **AINA CONSTRUCTION AND DEVELOPMENT CORPORATION** (TIN: 000-000-000), an entity engaged by the National Housing Authority (NHA), is exempt from project-related income taxes, creditable withholding tax and value added tax (VAT), pursuant to Section 20 (d) (1) and (3) of Republic Act No. 7279, on its income received directly in connection with the construction/development of socialized housing units/lots under the National Housing Authority (NHA)'s AFP/PNP HOUSING PROGRAM, [1] to wit:

Project Name	**Location**	**No. of Socialized Housing Units/Lots Subject of Tax Exemption**	**Date of Deed of Conveyance**	**Date of Contract Agreement**	**Contract Price**
St. Michael Village AFP/PNP Housing Project	Brgy. Songculan, Dauis, Bohol	**500**	April 4, 2016	February 9, 2016	P_____

However, the purchases of goods/articles by **AINA CONSTRUCTION AND DEVELOPMENT CORPORATION** shall be subject to VAT, even if the said purchases are to be used for the socialized housing project, since VAT is an indirect tax which can be passed on by the seller of the goods/services. It shall be understood that **AINA CONSTRUCTION AND DEVELOPMENT CORPORATION** must issue VAT-exempt official receipts on its gross receipts from the said socialized housing project.

Moreover, the Deeds of Absolute Sale/Unilateral Sale executed by the Landowners in favor of the NHA over the parcels of land described below, to wit:

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Date of Deeds of Absolute Sale	Name of Landowner/ Seller	Original Certificate of Title (OCT)/Transfer Certificate of Title (TCT) No.	Area (sq. m.)	Area Transferred (sq. m.)	Location
January 23, 2017	AAA	CARP 2015009731	9,694	9,694	Brgy. Songculan, Dauis, Bohol
January 23, 2017	AAA	129282	8,842	8,842	Brgy. Songculan, Dauis, Bohol
January 23, 2017	BBB	21538	9,367	9,367	Brgy. Songculan, Dauis, Bohol
January 23, 2017	CCC [2]	60749	13,137	13,137	Brgy. Songculan, Dauis, Bohol

which shall be used for the above-mentioned socialized housing project, are not subject to income tax/capital gains tax/expanded withholding tax, documentary stamp tax and value-added tax (VAT) pursuant to Sections 19 and 20 of Republic Act (RA) No. 7279 and Section 109 (1) (P) of the Tax Code of 1997, as amended.

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 buyer without the necessary Certificate Authorizing Registration (CAR) issued by this Bureau. In this regard, this CTE shall be presented to the Revenue District Office (RDO) concerned in order for the latter to issue the CAR.

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

Issued this 18th day of January, 2018.

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

Footnotes

1. Please see Annex "A" for the list of beneficiaries.
2. Represented by Heirs, DDD, EEE, FFF, GGG and HHH. Please note that the tax exemption set forth herein does not include exemption from estate tax due, if any, on the estate of CCC.

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