April 11, 2019

CERTIFICATE OF TAX EXEMPTION NO. 245-19

CERTIFICATE OF TAX EXEMPTION

This certifies that the Deed of Absolute Sale (DOAS) executed by the Landowners, represented by **The One Dynamic Three Realty & Dev't. Corp.** (TIN: 000-000-000-000), and the **National Housing Authority (NHA)** over the parcels of land described below, to wit:

Date of DOAS	Name of Landowners	Transfer Certificate of Title Nos.	Aggregate Area (sq.m.) per TCT	Area Transferred for NHA Utilization	Location of Property/ies
December 18, 2018	Sps. AAA & BBB	T-264548	35,949	35,949	Naic, Cavite
	CCC	T-672173	34,868	34,868	
	DDD	T-937089	34,868	2,058	
	EEE [1]	T-80741	18,240	10,236	
	FFF married to GGG	057-2017005510	27,672	4,436	
	HHH, III, JJJ & KKK, LLL	T-75848	106,178	97,330	

which shall be used for the **Malainen Park Residences 1 and 2**, consisting of 2,100 housing units, located at Brgy. Malainen Bago, Naic, Cavite, a socialized housing project of the NHA under the Supreme Court *Mandamus* Program thru the Community Based Initiative approach (CBIA), is not subject to **capital gains tax/creditable withholding tax, value-added tax** and **documentary stamp tax** pursuant to Sections 19 and 20 of Republic Act (RA) No. 7279 and Section 109 (1) (P) of the 1997 Tax Code, 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 NHA without the Certificate Authorizing Registration (CAR) issued by this Bureau. In this regard, this CTE, together with the documentary requirements provided under RMO No. 15-2003, shall be presented to the Revenue District Office (RDO) concerned in order for the latter to issue the CAR.

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Upon application for exemption, a lien on the titles of the lands shall be annotated by the Register of Deeds 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 7279.

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 11th day of April, 2019.

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

Footnotes

1. This Certificate of Tax Exemption does not cover estate tax due, if any, on the estate of EEE.

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