February 27, 2018

CERTIFICATE OF TAX EXEMPTION NO. 284-18

CERTIFICATE OF TAX EXEMPTION
issued to

Name of Seller	TIN	Address
Philtrust Realty Corporation *formerly known as* Manila Center Building Corporation	000-000-000-000	1000-1046 PPL Bldg., United Nations Ave., 674 Paco, Manila 1007

-and-

Name of Homeowners Association (HOA)	TIN	Address
Good Shepherdville Homeowners' Association Inc.-A	000-000-000-000	Sitio Dalig III, Brgy. Dalig, Antipolo City

This certifies that the Deed of Absolute Sale entered by the Seller and the HOA dated August 1, 2011 over a parcel of land described below, to wit:

Transfer Certificate of Title	Area (sq.m.)	Transferred (sq.m.)	Area of CMP (sq.m.)	Location
N-36506	12,000	1,169	1,169	Brgy. Dalig, Municipality of Antipolo, Province of Rizal
N-36507	15,000	7,393	7,393	

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 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

Copyright 2020 CD Technologies Asia, Inc.

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 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 27th day of February, 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.