REPUBLIC OF THE PHILIPPINES
DEPARTMENT OF FINANCE
BUREAU OF INTERNAL REVENUE
Quezon City

Certificate of Tax Exemption No:
035-2018

CERTIFICATE OF TAX EXEMPTION

TO ALL WHOM IT MAY CONCERN:

This certifies that **E.M. CUERPO, INC.**, (TIN:), 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, otherwise known as the "Urban Development and Housing Act of 1992", on its income received directly in connection with the construction/development of socialized housing units under the National Housing Authority (NHA)'s Yolanda Permanent Housing Program, to wit:

Project Name	Date of Contract	Contract Price	Date of Notice of Award	Location	No. of Socialized Housing Units subject of Tax Exemption
St. Francis Village 2	February 20, 2017		May 23, 2016	Brgy. Suhi, Tacloban City	

However, the purchases of goods/articles by **E.M. CUERPO, INC.** 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 **E.M. CUERPO, INC.** must issue VAT-exempt official receipts on its gross receipts from the said socialized housing project.

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

Date of Deed of Absolute Sale	Name of Landowner/ Seller	Original/Transfer Certificate of Title (OCT/TCT) No.	Area (sq. m.)	Area Transferred (sq. m)	Location
December 6, 2016	Heirs of Buenaventura Magallon[1]				Barrio of Cabalawan, Tacloban City
December 6, 2016	Heirs of Buenaventura Magallon[2]				Barrio of Cabalawan, Tacloban City

[1] Felomina Magallon-Bolante, Dominga Magallon-Mamites, Heirs of Concepcion Magallon-Leuterio (Lilibeth L. Yasay and Elma Leuterio), Heirs of Miguela Magallon-Balunan (Gerardo B. Magallon, Amorsola B. Lada and Mary Ann B. Durana), and Heirs of Alfredo V. Magallon (Leni M. Leaño, Liza M. Ondes and Alexander Magallon).
[2] Ibid

035-2018
1-24-2018

which shall be used for the above-mentioned socialized housing project, are not subject to capital gains tax/expanded withholding tax and documentary stamp tax pursuant to Sections 19 and 20 of Republic Act (RA) No. 7279.

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 _____ day of JAN 24 2018, _____.

CAESAR R. DULAY
Commissioner of Internal Revenue

012766

K-1