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

**Certificate of Tax Exemption No:**
0413-2019

# CERTIFICATE OF TAX EXEMPTION

TO ALL WHOM IT MAY CONCERN:

This certifies that the Deed of Absolute Sale executed by [redacted] Corporation (TIN: [redacted]-000) in favor of the Municipality [redacted], over the parcels of land described below, to wit:

| Date of Deed of Absolute Sale | Transfer Certificate of Title (TCT) Nos. | Tax Declaration Nos. | Area (Sq. m.) | Area Transferred (Sq. m.) | Location |
|---|---|---|---|---|---|
| February 08, 2018 | T- [redacted] | [redacted] | 2,771 | 2,771 | [redacted] |
| | T- [redacted] | [redacted] | 10,144 | 10,144 | |
| | T- [redacted] | [redacted] | 10,144 | 10,144 | |

which shall be used for establishment of a relocation site[1] for families living in disaster prone areas of the Municipality [redacted], is not subject to income tax/capital gains tax (CGT)/expanded withholding tax pursuant to Section 20 of Republic Act (RA) No. 7279, as amended by RA No. 10884 (Balanced Housing Development Program Amendments) dated July 17, 2016, and to value-added tax (VAT) pursuant to Section 109 (L) (P) of the National Internal Revenue Code of 1997, as amended. However, the sale is subject to documentary stamp tax (DST) imposed under Section 196 of the National Internal Revenue Code of 1997, as amended, based on the actual consideration of the property transferred, considering that one of the contracting parties is the Government.

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 (RD) 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 after submission of the requirements provided under Revenue Memorandum Order (RMO) No. 15-2000, as amended, including proof of payment of DST.

Upon application for exemption [redacted] the titles of the land shall be annotated by the RD having jurisdiction over the property, to the effect that the same are to be applied or are being applied to relocation socialized housing project pursuant to RA No. 7279, as amended.

This CTE 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 [redacted] day of JUL 24 2019.

CAESAR R. DULAY
Commissioner of Internal Revenue

By: [redacted]

[1] Per Municipal Resolution No. 2017-[redacted] dated October 26, 2017.