August 9, 2019

CERTIFICATE OF TAX EXEMPTION NO. 443-19

CERTIFICATE OF TAX EXEMPTION

This certifies that the Deed of Absolute Sale dated June 13, 2019 executed by the **Landowners** in favor of the **National Housing Authority (NHA)** over the parcels of land described below, [1] to wit:

Date of Deed of Sale	Name of Landowners	Transfer Certificate of Title	Aggregate Area	Area Transferred	Location of Properties
June 13, 2019	Lourdes Agri Ventures, Inc. and AAA	T-000000 and T-000000	125,048 and 45,000, sq.m., respectively	122,738 sq.m. (consisting of 740 housing units)	Brgy. Dos Hermanas, Talisay City, Negros Occidental

which shall be used for the **Vista Alegre Homes**, a socialized housing project of the NHA under the New AFP/PNP Housing Program, to be undertaken by A5R Dynamics Construction Corp. for the benefit of the members of the Military and Police personnel of the AFP/PNP, including the BFP/BJMP and BuCor, is **not subject** to income tax/capital gains tax, documentary stamp tax and value-added tax 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 NHA without the 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.

Upon application for exemption, a lien on the titles of the land shall be annotated by the Register of Deeds having jurisdiction over the properties, to the effect that the same is to be applied or is being applied to a socialized housing project pursuant to RA No. 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.

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Issued this 9th day of August, 2019.

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

Footnotes

1. Consideration was paid by A5R Dynamics Construction Corporation for NHA.

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