May 8, 2018

CERTIFICATE OF TAX EXEMPTION NO. 778-18

CERTIFICATE OF TAX EXEMPTION

TO ALL WHOM IT MAY CONCERN :

This certifies that **PERSAN CONSTRUCTION, INC.** (TIN: 000-000-000-000), an entity engaged by the National Housing Authority (NHA), 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, on its income received directly in connection with the construction/development of socialized housing units under the NHA's Yolanda Permanent Housing Program, to wit:

Date of Notice of Award	Date of Contract Agreement	Contract Price (Php)	Project Name	Location	No. of Socialized Housing Units subject of tax exemption
August 11, 2017	November 6, 2017	P_____	Concepcion People's Village Phase II	Brgy. Bacjawan Norte, Concepcion, Site 2a, Iloilo	500

However, the purchases of goods/articles by **PERSAN CONSTRUCTION, 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 **PERSAN CONSTRUCTION, INC.** must issue VAT Exempt official receipts on its gross receipts from the said socialized housing project.

Moreover, the Deeds of Absolute Sale/Unilateral Sale Executed by the Landowners in favor of the NHA over the parcel of land described below, to wit:

Date of Deeds of Sale	Name of Landowners/Sellers	Transfer Certificate of Title No.	Area (Sq.m.)	Description	Area Transferred (Sq.m.)	Location
	AAA BBB CCC DDD			Lot 4 being subdivision of F-45525 Doc. No. 263	13,125	
	EEE			Lot 3-A being		Brgy. Bacjawan

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January 29, 2018	FFF GGG HHH III JJJ KKK	CLOA T-10,760	191,655	Portion of Lot 3 Doc. Nos. 261 & 262	19,847	Norte, Concepcion, Iloilo
				Lot 1-A being Portion of Lot 1 Doc. No. 266	6,454	

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

It is, however, understood that this CTE is never intended, and shall not be construed, as giving authority to 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 8th day of May, 2018.

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

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