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

**Certificate of Tax Exemption No:**
PSH-E400-2022

# CERTIFICATE OF TAX EXEMPTION

**TO ALL WHOM IT MAY CONCERN:**

This certifies that the Deed of Absolute Sale (DOAS) executed by the Landowner in favor of the City Government of Quezon City over the parcel of land described below, to wit:

| Date | Name of Vendor | Transfer Certificate of Title No. | Area (Sq.m.) | Area Transferred (Sq. m.) | Location |
|---|---|---|---|---|---|
| May 11, 2022 | Univille Development Corporation | | | | Howmart Rd., Brgy. Baesa, Quezon City |

which shall be used by the City Government of Quezon City intended for the development of a socialized housing project for the benefit of Quezon City Informal Settlers Families (ISFs)[1], is **not subject** to capital gains tax/creditable withholding tax pursuant to Section 20 (d)(2) 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 (1)(P) of the National Internal Revenue Code (Tax Code) of 1997, as amended. The transaction is, however, **subject** to **documentary stamp tax** under Section 196 of the Tax Code of 1997, as amended, based on the actual consideration of the property transferred considering that one of the 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 concerned Register of Deeds to effect transfer of the land title in the name of the buyer without the necessary Certificate Authorizing Registration (CAR) issued by this Bureau. In this regard, this CTE, together with the documentary requirements provided under Revenue Memorandum Order (RMO) No. 15-2003, 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 title of the land, shall be annotated by the Register of Deeds having jurisdiction over the property, to the effect that the same is to be applied or is being applied to a socialized housing project pursuant to RA 7279.

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 _____ day of SEP 23 2022.

**LILIA CATRIS GUILLERMO**
Commissioner of Internal Revenue

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K-1-JAC

[1] Per Quezon City Council Resolution No. SP-7927 dated August 13, 2019.