



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

Certificate of Tax Exemption No:

461-2016

**CERTIFICATE OF TAX EXEMPTION**

**TO ALL WHOM IT MAY CONCERN:**

This certifies that **J.C. UYECIO CONSTRUCTION AND DEVELOPMENT COMPANY** (TIN: \_\_\_\_\_), 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 (RA) 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 lots and housing units under the NHA's Socialized Housing Program through the Community Initiative Approach Program (CIAP), to wit:

| Project Name                     | Location                       | No. of Socialized Housing Units Subject of Tax Exemption | Beneficiaries                                                              |
|----------------------------------|--------------------------------|----------------------------------------------------------|----------------------------------------------------------------------------|
| Jowivil Craters View Subdivision | Brgy. Makina, Balete, Batangas | 302 <sup>1</sup>                                         | Jowivil Craters View Subdivision Homeowners Association, Inc. <sup>2</sup> |

However, the purchases of goods/articles by **J.C. UYECIO CONSTRUCTION AND DEVELOPMENT COMPANY** 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 **J.C. UYECIO CONSTRUCTION AND DEVELOPMENT COMPANY** must issue VAT-exempt official receipts on its gross receipts from the said socialized housing project.

Moreover, the Deeds of Absolute Sale entered by the Landowner and the NHA over the parcels of land described below, to wit:

| Date          | Name of Landowner                | Transfer Certificate of Title | Area (sq. m.) | Transferred (sq. m.) | Location         |
|---------------|----------------------------------|-------------------------------|---------------|----------------------|------------------|
| June 29, 2016 | Municipality of Balete, Batangas |                               | 461           | 461                  | Balete, Batangas |
| June 29, 2016 | Municipality of Balete, Batangas |                               | 25,371        | 24,371               |                  |

which will be used for the above mentioned socialized housing project, is not subject to income tax/capital gains tax/expanded withholding tax, documentary stamp tax and VAT pursuant to Sections 19 and 20 of RA No. 7279 and Section 109 (1) (P) of the National Internal Revenue Code of 1997, as amended.

It is, however, understood that this Certificate of Tax Exemption 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 of authority to

<sup>1</sup> To be developed and constructed on the parcels of land covered by TCT Nos. \_\_\_\_\_ and \_\_\_\_\_, with an aggregate area of 25,832 sq. m. pursuant to the Memorandum of Understanding executed by and between the NHA and the Municipal Government of Balete, Batangas, dated June 30, 2015

<sup>2</sup> Please see Annex "A" for the list of beneficiaries consisting of 9 pages.

register issued by this Bureau. This record, this CTE shall be presented to the Revenue District Office (RDO) concerned for record by the latter to issue the Certificate Authorizing Registration (CAR). The CAR shall only be issued after the submission of commitments provided under RDO No. 105-2003.

Upon application for execution, lien on the titles of the lands shall be annotated by the Register of Deeds having jurisdiction over the properties, to the effect that the same are to be applied or are 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 \_\_\_\_\_ 2017.

  
CAESAR R. DULAY  
Commissioner of Internal Revenue

2-A-1-LMAT

009442