REPUBLIC OF THE PHILIPPINES
DEPARTMENT OF FINANCE
BUREAU OF INTERNAL REVENUE

Certificate of Tax Exemption No:
NSH- 359 - 2022
AUG 04 2022

CERTIFICATE OF TAX EXEMPTION

TO ALL WHOM IT MAY CONCERN:

This certifies that the Deed of Absolute Sale (DOAS) executed by the Landowners in favor of the National Housing Authority (NHA) over the parcel of land described below, to wit:

Date	Name of Landowner/ Seller[1]	Original Certificate of Title No.[2]	Area (Sq.m.)	Area Transferred (Sq. m.)	Location
February 21, 2022	The Joint Venture of Legazpi Premium Dev't. Corp. and Sanrho Builders, Inc.				Brgy. Biyong, Tiwi, Albay

which shall be used for the development of a socialized housing project located in Brgy. Biyong, Tiwi, Albay under the Community Based Initiative Approach (CBIA) Program of the NHA,[3] is **not subject to capital gains tax** and **documentary stamp tax** pursuant to Sections 19 and 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 (1)(P) of the National Internal Revenue Code (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 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.

[1] Ms. Maribel M. Rañola is the Authorized Managing Officer and the sole representative and signatory in all bids, contracts and other documents pertinent to the project as embodied in the Joint Venture Agreement dated December 17, 2019.
[2] This Certificate of Tax Exemption does not include exemption from the payment of capital gains tax and documentary stamp tax on the transfer of a portion of the property covered by OCT No. P- in the Deed of Absolute Sale executed by and between the registered owners, Spouses Gomercindo G. Aznar and Eugenia P. Aznar and the Joint Venture of Legazpi Premium Development Corporation and Sanrho Builders, Inc. dated February 23, 2021.
[3] Per Certification of the NHA, Region V dated June 21, 2022.

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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 No. 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 _____________, ______.

LILIA CATRIS GUILLERMO
Commissioner of Internal Revenue

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