REPUBLIC OF THE PHILIPPINES
DEPARTMENT OF FINANCE
BUREAU OF INTERNAL REVENUE

Certificate of Tax Exemption No.
CMP-415-2022

CERTIFICATE OF TAX EXEMPTION

TO ALL WHOM IT MAY CONCERN:

This certifies that the Deed of Absolute Sale dated March 18, 2022, entered into by and between:

Name of Sellers[1]	TIN	Address
Edgardo S. Sumilong m/t Violeta C. Sumilong		

-and-

	TIN	Address
Social Housing Finance Corporation (SHFC)		6th Floor BDO Plaza Building 8737 Paseo de Roxas Makati City 1299

over the parcel of land described below, to wit:

Transfer Certificate of Title No.	Total Area (sq.m.)	Transferred (sq.m.)	Area of CMP (sq.m.)	Location

being a Community Mortgage Program (CMP) in favor of Parlas Homeowners Association, Inc., is **not subject** to **capital gains tax** pursuant to Section 32 (b) of Republic Act (RA) No. 7279, as amended by RA No. 10884. The transaction is, however, **subject** to **documentary stamp tax** under Section 196 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 the 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 Certificate shall be presented to the Revenue District Office (RDO) concerned in order for the latter to issue the

[1] A Consularized Special Power of Attorney dated December 21, 2018, was granted to Edgardo S. Sumilong by his wife, Violeta C. Sumilong, to execute the Deed of Absolute Sale on her behalf for the sale of their property identified and described in TCT No. T-1034545.

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CAR. The CAR shall only be issued after the submission of the requirements provided under Revenue Memorandum Order (RMO) No. 15-2003.

The Bureau of Internal Revenue (BIR) shall conduct verification and post-audit that the actual occupants of the property transferred under the CMP are qualified beneficiaries and therefore, the sellers are entitled to exemption from capital gains tax or income tax imposed under Sections 24 (D)(1) and/or 27 (D)(5) of the Tax Code of 1997, as amended.

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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