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

Certificate of Tax Exemption No: CMF-435-2021

CERTIFICATE OF TAX EXEMPTION

TO ALL WHOM IT MAY CONCERN:

This certifies that the Deed of Absolute Sale (DOAS) dated September 14, 2021, executed by the Landowners in favor of the City Government of Cebu over the parcel of land described below, to wit:

Date of Deed of Absolute Sale[1]	Name of Vendors	Transfer Certificate of Title No.	Area (Sq.m.)	Area Transferred (Sq. m.)	Location
September 14, 2021	Helen B. Potenciano Samantha Angelu B. Potenciano Gene Marie B. Potenciano Norgene Paulito B. Potenciano		25,254	22,177	Quiot Pardo, Cebu City

which shall be used by the City Government of Cebu as a relocation site in line with the City's continuing program of giving the underprivileged and homeless citizens the opportunity to own a lot at reasonable and affordable price through its Socialized Housing Program, is **not subject** to capital gains 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. The transaction is, however, **subject** to **documentary stamp tax** under Section 196 of the National Internal Revenue 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 (RD) 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] Special Power of Attorney dated October 3, 2017, was granted to Helen B. Potenciano to execute the Deed of Absolute Sale on behalf of the landowners.

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Date issued DEC 02 2021

Upon application for exemption, a lien on the title of the land, shall be annotated by the RD 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 DEC 02 2021, ______.

CAESAR R. DULAY
Commissioner of Internal Revenue
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