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

Certificate of Tax Exemption No.
0367-2019

CERTIFICATE OF TAX EXEMPTION

TO ALL WHOM IT MAY CONCERN:

This certifies that the Deed of Absolute Sale dated June 06, 2017, entered into by and between:

Name of Seller/s Landowner/s	TIN	Address
Merlyn Carmelita Novero Rivera		San Antonio, Los Baños, Laguna
Archibald N. Rivera		
Jose Alberto N. Rivera		
Anthony N. Rivera		

-and-

Name of Homeowners Association (HOA)	TIN	Address
Better Land Homeowners Association, Inc. Phase 2		Purok 6, Brgy. San Antonio, Los Baños, Laguna 4030

over the parcels of land described below, to wit;

Transfer Certificate of Title (TCT) Nos	Total Area (sq. m.)	Area Transferred (sq. m.)	Area of CMP (sq. m.)	Location
	500	500	500	Bo. of San Antonio, Los Baños, Laguna
	500	500	500	
	500	500	500	
	13,894	13,894	13,894	
Total	**15,394**	**15,394**	**15,394**	

being a Community Mortgage Program (CMP)[1], is **not subject** to capital gains tax and value-added tax (VAT) pursuant to Section 32 (b) of Republic Act (RA) No. 7279, as amended by RA No. 10884 (Balanced Housing Development Program Amendments) dated July 17, 2016, and Section 109 (1) (P) of the National Internal Revenue Code of 1997, as amended. However, the transaction is **subject to documentary stamp tax (DST)** under Section 196 of the same Code.

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 register 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 Certificate Authorizing

[1] Shall be proportionately distributed to the association's qualified member-beneficiaries (See Annex)

0307-2019
JUL 03 2019

Registration (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 seller is entitled to exemption from capital gains tax or income tax imposed under Sections 24 (D)(1) and/or 27 (D)(5) the National Internal Revenue Code of 1997, as amended.

This Certificate 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 JUL 03 2019. _____.

CAESAR R. DULAY
Commissioner of Internal Revenue

K-1-LMAT

026547