Bringing In Revenues
for Nation-Building

REPUBLIC OF THE PHILIPPINES
DEPARTMENT OF FINANCE
BUREAU OF INTERNAL REVENUE

BAGONG PILIPINAS

Certificate of Tax Exemption No.
DT-042.2025

CERTIFICATE OF TAX EXEMPTION

TO WHOM IT MAY CONCERN:

This certifies that the Deed of Donation dated April 24, 2023 executed by:

Name of Donor	TIN	Address
DIAMOND EXPORT CORPORATION		1051 North Bay Blvd., Navotas, Metro Manila 1485

in favor of:

Name of Donee	TIN	Address
CITY GOVERNMENT OF BACOOR		Bacoor Blvd., Bayanan, Bacoor, Cavite 4102

covering the following properties:

Transfer Certificate of Title	Total Area (sq.m.)	Area Donated (sq.m.)	Location
(	7,769	769	Brgy. Alima, Bacoor City
( )	5,482	5,482	

being a gift in favor of the political subdivision of the National Government, is exempt from the payment of the donor's tax pursuant to Section 101 (A) (1) of the National Internal Revenue Code of 1997 (Tax Code), as amended.

The donation shall be subject to value-added tax if the donated properties are part of the assets of the donor that are being held or offered for lease or rent, the same being considered a transaction deemed sale pursuant to Section 4.106-7 of Revenue Regulations (RR) No. 16-2005, as amended.

Moreover, Section 185 of Regulations No. 26, otherwise known as the Revised Documentary Stamp Tax Regulations, implementing Title VII of the Tax Code, as amended, provides that conveyances of realties not in connection with a sale, to trustees or other persons without consideration are not taxable. Accordingly, the Deed of Donation is likewise not subject to the documentary stamp tax (DST) prescribed under Section 196 of the Tax Code, as

[1] Old Title No. of RD Province of Cavite before being transferred to RD Province of Cavite Bacoor Branch

amended. However, the acknowledgement of the Deed of Donation before a notary public is subject to DST of ₱30.00 imposed under Section 188 of the same Code.

This Certificate of Tax Exemption is being issued on the basis of the facts and documents as represented and submitted. However, if upon investigation, the Bureau of Internal Revenue ascertains that the facts are different, then this Certificate shall be considered null and void.

Issued this _____ day of MAR 24 2025 .

ROMEO D. LUMAGUI, JR.
Commissioner of Internal Revenue

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