January 9, 2019

CERTIFICATE OF TAX EXEMPTION NO. 044-19

CERTIFICATE OF TAX EXEMPTION
issued to

NAZARETH SCHOOL, INC.
272 Plaza Sta. Teresita, Brgy. 435, Sampaloc, Manila 1008
TIN: 000-000-000-000

This certifies that donation under the Deed of Donation dated March 25, 2013, executed by **NAZARETH SCHOOL, INC.** in favor of:

Name of Donee	TIN	Address
Manresa School, Inc.	000-000-000-000	Candida Maria St., Brgy. B.F. Homes, District II, Parañaque City

covering the following property;

Transfer Certificate of Title No.	Area (sq.m.)	Area Donated (sq.m.)	Location
22162	955	955	Sampaloc, Manila

being a gift in favor of an **educational** corporation is exempt from the payment of the donor's tax pursuant to Section 101 (A) (3) [1] of the Tax Code of 1997, as amended, subject to the condition that not more than thirty percent (30%) of said gift shall be used by the donee for administration purposes. The Register of Deeds shall annotate such condition at the back of the Transfer Certificate of Title because failure to comply with said condition shall subject the donation to donor's tax.

Moreover, Section 185 of Regulations No. 26, otherwise known as the Revised Documentary Stamp Tax Regulations, implementing Title VII of the Tax Code of 1997, 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 Deeds of Donation are likewise not subject to the documentary stamp tax prescribed under Section 196 of the Tax Code of 1997, as amended, but only to the documentary stamp tax of P15.00 [2] imposed under Section 188 of the same Code.

This Certificate of Tax Exemption is being issued on the basis of the facts and

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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 9th day of January, 2019.

(SGD.) CAESAR R. DULAY
Commissioner of Internal Revenue

Footnotes

1. Now Section 101 (A) (2) of the Tax Code of 1997 as amended by Republic Act No. 10963.
2. The old DST rate of 15.00 is used since the donation took place prior to the effectivity of R.A. No. 10963.

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