January 9, 2019

CERTIFICATE OF TAX EXEMPTION NO. 045-19

CERTIFICATE OF TAX EXEMPTION
issued to

AAA

TIN: 000-000-000-000

This certifies that the Deed of Donation dated November 2, 2017 executed by **AAA** in favor of:

Name of Donee	TIN	Address
Servants of the Risen Christ Monastic Community, Inc.	000-000-000-000	St. Therese of the Child Jesus, Ramos, Tarlac 2311

covering the following property;

TCT No.	Kind of Property	Area Donated (sq.m.)	Location
672906-R	Land	240	Bo. of San Agustin & Paralaya, Arayat, Pampanga

being a gift in favor of a **religious** corporation is exempt from the payment of the donor's tax pursuant to Section 101 (A) (2) [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.

Moreover, Section 185 of Regulations No. 26, otherwise known as the Revised Documentary Stamp Tax Regulations, implementing Title VII of the Tax Code of the 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 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

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void.

Issued this 9th day of January, 2019.

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

Footnotes

1. Renumbered by Republic Act No. 10963 or the TRAIN Law.
2. The old DST rate was used since the donation took place prior to R.A. No. 10963.

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