REPUBLIC OF THE PHILIPPINES
DEPARTMENT OF FINANCE
BUREAU OF INTERNAL REVENUE

Certificate of Tax Exemption No.
098-2017

CERTIFICATE OF TAX EXEMPTION

issued to

Name of Donor	TIN	Address
Daughters of St. Teresa, Inc. (formerly: Carmelite Tertiaries of the Blessed Eucharist)		Valladolid, Carcar, Cebu

-and-

Name of Donee	TIN	Address
Missionary Sisters of the Holy Family, Inc.		12th St., Nazareth, Cagayan de Oro City

This certifies that the two (2) Deeds of Donation dated November 22, 2011 and February 6, 2012, entered by the Donor and the Donee over the parcels of land described below, to wit;

Date	Transfer Certificate of Title	Area (sq.m.)	Location
11-22-11		480	Brgy. Nazareth, Cagayan de Oro City
02-06-12		10,000	Bontola, Macasandig, Cagayan de Oro City

being gifts in favor of a **religious** corporation is exempt from the payment of the donor's tax pursuant to Section 101 (A) (3) 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, 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, as amended, but only to the documentary stamp tax of P15.00 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 BIR ascertains that the facts are different, then this Certificate shall be considered null and void.

Issued this _____ day of MAR [illegible], 17.

CAESAR R. DULAY
Commissioner of Internal Revenue

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