November 8, 2018

CERTIFICATE OF TAX EXEMPTION NO. 1316-18

CERTIFICATE OF TAX EXEMPTION
issued to

PHILIPPINE CHRISTIAN UNIVERSITY (PCU)
1648 Taft Avenue cor. Pedro Gil Street, Brgy. 694, Zone 075, Malate, Manila
TIN: 000-000-000-000

This certifies that the donation under the Deed of Donation dated September 5, 2018, executed by PHILIPPINE CHRISTIAN UNIVERSITY (PCU) in favor of:

Name of Donee	TIN	Address
UNITED CHURCH OF CHRIST IN THE PHILIPPINES (UCCP)	000-000-000-000	877 Epifanio de los Santos Avenue, West Triangle, Quezon City

covering the following properties:

Transfer Certificate of Title Nos.	Area (sq.m.)	Area Donated (sq.m.)	Location
114226	2,534	2,534	Gen. Malvar St., Brgy. 696, Zone 076, Malate, Manila
115694	3,750	3,750	Vasquez St., Brgy. 697, Zone 076, Malate, Manila

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 196 of the Tax Code of 1997, as amended, provides that transfers exempt from donor's tax under Section 101 (a) and (b) of the same Code shall be exempt from documentary stamp tax. Accordingly, the Deed of Donation is likewise not subject to the documentary stamp tax prescribed under Section 196 of the Tax Code, as amended, but

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only to the documentary stamp tax of P30.00 [2] imposed under Section 188 of the same Code, as amended.

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 8th day of November, 2018.

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

Footnotes

1. Renumbered by Republic Act No. 10963 or TRAIN Law.
2. The New DST rate of P30.00 shall be used since the donation took place upon the effectivity of R.A. 10963 or TRAIN Law.

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