**November 19, 2018**

# CERTIFICATE OF TAX EXEMPTION NO. 1373-18

## CERTIFICATE OF TAX EXEMPTION
issued to

PHILIPPINE BAPTIST S.B.C., INC.
2715 Park Avenue, Pasay City
TIN: 000-000-000-000

This certifies that the donation under the Deed of Donation dated June 08, 2017, executed by PHILIPPINE BAPTIST S.B.C., INC. in favor of:

| Name of Donee | TIN | Address |
|---|---|---|
| Church Strengthening Ministry, Inc. | 000-000-000-000 | CSM Bldg., Pascor Drive, Brgy. Sto. Niño, Parañaque City |

covering the following property:

| Transfer Certificate of Title | Area (sq.m.) | Area Donated (sq.m.) | Location |
|---|---|---|---|
| 126395 | 1,905 | 1,905 | Brgy. Ibayo, Parañaque City |

being a gift in favor of a **religious** 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.

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 Deed of Donation is 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 [2] imposed under Section 188 of the same Code.

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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 19th day of November, 2018.

**(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 10963.
2. The old DST rate of P15.00 is used since the donation took place prior to the effectivity of RA No. 10963.

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