January 29, 2019

CERTIFICATE OF TAX EXEMPTION NO. 138-19

CERTIFICATE OF TAX EXEMPTION
issued to

STATELAND, INC.
3/F State Centre Bldg., 333 Juan Luna St.,
Brgy 287, Zone 27, Binondo, Manila
TIN: 000-000-000-000

This certifies that the Deed of Donation, dated August 4, 2016, executed by the STATELAND, INC. in favor of:

Name of Donee	TIN	Address
Dasmariñas Water District	000-000-000-000	Camerino Ave., Zone I, Dasmariñas, Cavite 4114

covering the following property described below, to wit:

Transfer Certificate of Title	Area (sq.m.)	Area Donated (sq.m.)	Location
T-1345904	92	92	Aguinaldo Highway, Brgy.
T-1346394	84	84	Malinta, Dasmariñas, Cavite

being a gift in favor of a **government owned and controlled 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.

Accordingly, the Deed of Donation is likewise not subject to the documentary stamp tax prescribed under Section 196 of the Tax Code of 1997, as amended. However, the acknowledgement of the Deed of Donation before a notary public is subject 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 void.

Issued this 29th day of January, 2019.

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

Footnotes

1. Now Section 101 (A) (1) of the Tax Code of 1997, as amended by Republic Act No. 10963.
2. The old DST rate of P15.00 is used since the donation took place prior to the effectivity of R.A. No. 10963.

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