January 29, 2019

CERTIFICATE OF TAX EXEMPTION NO. 139-19

CERTIFICATE OF TAX EXEMPTION

TO ALL WHOM IT MAY CONCERN :

This certifies that the donation under the Deed of Donation dated June 12, 2014, executed by:

Name of Donors	TIN	Address
AAA	000-000-000	
BBB	-	_____
CCC	000-000-000	

in favor of:

Name of Donee	TIN	Address
BARANGAY WARD II, POBLACION, MINGLANILLA, CEBU	000-000-000	Ward II, Poblacion, Minglanilla, Cebu

covering the following property:

Transfer Certificate of Title (TCT)	Total Area Owned (sq. m.)	Area Donated (sq. m.)	Location
T-114623	732 [1] (Lot No. 5632-A-1)	23	Ward II, Poblacion, Minglanilla, Cebu

being a gift in favor of a political subdivision of the Government, is exempt [2] from the payment of the donor's tax pursuant to Section 101 (A) (2) [3] of the National Internal Revenue Code of 1997, as amended.

Moreover, Section 185 of Regulations No. 26, otherwise known as the Revised

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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 (DST) prescribed under Section 196 of the National Internal Revenue Code of 1997, as amended, but only to the DST of P15.00 [4] 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.

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

Footnotes

1. Per Deed of Donation dated June 12, 2014 and the Subdivision Plan prepared by Geodetic Engineer DDD.
2. This Certificate of Tax Exemption shall not include exemption from estate tax which may be due on the transfer of the subject property from the deceased co-owners to their respective heirs.
3. Now Section 101 (A) (1) of the National Internal Revenue Code of 1997, as amended by Republic Act (RA) No. 10963 (TRAIN Law).
4. Old rate was used since the Deed of Donation was executed on June 12, 2014 or prior to the effectivity of RA No. 10963 (TRAIN Law).

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