February 22, 2018

CERTIFICATE OF TAX EXEMPTION NO. 256-18

CERTIFICATE OF TAX EXEMPTION
issued to

AAA

TIN: 000-000-000-000

This certifies that the Deed of Donation dated May 27, 2016 executed by **AAA** in favor of:

Name of Donee	TIN	Address
Major Superior of the Somascan Fathers, Inc.	000-000-000-000	St. Jerome House, Commerce Avenue, Ayala Alabang Village New Alag, 1780 Muntinlupa City

covering the following property;

Transfer Certificate of Title	Area (sq.m.)	Area Donated (sq.m.)	Location
080-2016000143	85,850	85,850	Bolo Norte, Sipocot, Camarines Sur

being a donation 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 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 imposed under Section 188 of the same

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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 22nd day of February, 2018.

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

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