March 8, 2018

CERTIFICATE OF TAX EXEMPTION NO. 372-18

CERTIFICATE OF TAX EXEMPTION
issued to

AAA

TIN: 000-000-000-000

This certifies that the donation under the Deed of Donation of Real Property Inter Vivos dated June 26, 2014 executed by the **AAA** in favor of:

Name of Donee	TIN	Address
PRIOR PROVINCIAL OF THE AUGUSTINIAN PROVINCE OF SANTO NIÑO DE CEBU-PHILIPPINES, INC.	000-000-000-000	Sto. Niño Pilgrim Center Corner Osmeña Boulevard & P. Burgos, Sto. Niño, Cebu City 6000

covering the following property:

Tax Declaration No.	Area (sq.m.)	Donated (sq.m.)	Location
40-0006-04585	10,000	4,000	Langub, Santa Fe, Cebu

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 National Internal Revenue Code of 1997, as amended, subject to the condition that not more than thirty percent (30%) of the said gift shall be used by the donee for administration purposes. The Register of Deeds shall annotate such condition at the back of the Transfer Certificate of Title because failure to comply with said condition shall subject the donation to donor's tax.

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 National Internal Revenue Code of 1997, as amended, but only to the documentary stamp tax of

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P15.00 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 8th day of March, 2018.

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

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