March 8, 2018

CERTIFICATE OF TAX EXEMPTION NO. 373-18

CERTIFICATE OF TAX EXEMPTION
issued to

AAA

TIN: 000-000-000-000

This certifies that donation under the Deed of Donation dated September 23, 2016, executed by **AAA** in favor of:

Name of Donee	TIN	Address
Cebu City Government	000-000-000-000	City Hall, Cebu City

covering the following property:

Transfer Certificate of Title	Area (sq.m.)	Area Donated (sq.m.)	Location
107-2012000250	739	239	St. Michael Subdivision, Brgy. Kasambagan, Cebu City

being a donation in favor of a **Local Government Unit** is exempt from the payment of the donor's tax pursuant to Section 101 (A) (2) of the Tax Code of 1997, as amended.

Moreover, Section 185 of Regulations No. 26, otherwise known as the Revised Documentary Stamp Tax Regulations, implementing Title VII of the Tax Code of the 1997, as amended, 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, but only to the documentary stamp tax of 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.

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Issued this 8th day of March, 2018.

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

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