March 8, 2018

CERTIFICATE OF TAX EXEMPTION NO. 374-18

CERTIFICATE OF TAX EXEMPTION
issued to

MUNICIPAL GOVERNMENT OF LEZO, AKLAN
Poblacion, Lezo, Aklan
TIN: 000-000-000-000

This certifies that the donation under the Deed of Donation of Real Property Inter Vivos dated September 23, 2015 executed by the **MUNICIPAL GOVERNMENT OF LEZO, AKLAN** in favor of:

Name of Donee	TIN	Address
DISTRICT OF LEZO — IBAO ELEMENTARY SCHOOL	000-000-000-000	Ibao, Lezo, Aklan

covering the following property:

Tax Declaration	Area (sq.m.)	Location
05-007-0142 [1]	7,441	Ibao, Lezo, Aklan

being a donation in favor of an agency of the Government, is exempt from the payment of the donor's tax pursuant to Section 101 (A) (2) of the National Internal Revenue 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, 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 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

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void.

Issued this 8th day of January, 2018.

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

Footnotes

1. Portion of Tax Declaration No. 05-007-0142 with an area of 8,765 sq.m.

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