March 8, 2018

CERTIFICATE OF TAX EXEMPTION NO. 375-18

CERTIFICATE OF TAX EXEMPTION
issued to

MA. THERESA CHRISTIAN ACADEMY, INC.
Gen. Yngente Ave., Brgy. Talolong, Lopez, Quezon
TIN: 000-000-000-000

This certifies that the donation under the Deed of Donation dated September 16, 2016, executed by **Ma. Theresa Christian Academy, Inc.** in favor of:

Name of Donee	TIN	Address
Quezon Center for Research and Studies, Inc.	000-000-000-000	3rd Floor Garcia Corporate Tower, Rizal cor. Granja Sts., Brgy. 5, Lucena City, 4301 Quezon

over the parcel of land described below, to wit:

Transfer Certificate of Title	Area (sq.m.)	Location
T-484230	5,308	Brgy. Bocboc, Lopez, Quezon

being a gift in favor of a non-stock, non-profit educational institution 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, as amended, but only to the documentary stamp tax of PhP15.00 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

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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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