March 9, 2018

CERTIFICATE OF TAX EXEMPTION NO. 422-18

CERTIFICATE OF TAX EXEMPTION
issued to

AAA

TIN: 000-000-000-000

This certifies that donation under the Deed of Donation dated October 01, 2012, executed by **AAA**, in favor of:

Name of Donee	TIN	Address
The Roman Catholic Archbishop of Cagayan De Oro, Inc.	000-000-000-000	Archbishop Palace, Cagayan De Oro City 9000

covering the following property;

Transfer Certificate of Title	Area (sq.m.)	Area Donated (sq.m.)	Location
T-47774	378	378	Cogon, Cagayan De Oro City

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. The Register of Deeds shall annotate such condition at the back of the Transfer Certificates 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 of the 1997, as amended, provides that conveyances of realties not in connection with a sale, to trustees

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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.

Issued this 9th day of March, 2018.

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

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