March 9, 2018

CERTIFICATE OF TAX EXEMPTION NO. 424-18

CERTIFICATE OF TAX EXEMPTION

TO ALL WHOM IT MAY CONCERN :

This certifies that the donation under the Deed of Donation dated April 28, 2015, made and executed pursuant to Section 31 of Presidential Decree (PD) No. 957, as amended by PD No. 1216, by and between:

Name of Donor	TIN	Address
ER3G RESOURCES & DEVELOPMENT CORP.	000-000-000-000	1628 Cypress St., Dasmariñas Village, Makati City 1221

in favor of:

Name of Donee	TIN	Address
CITY GOVERNMENT OF TUGUEGARAO CITY	-	Tuguegarao City

covering the following properties:

Transfer Certificate of Title (TCT) No.	Total Area (sq. m.)	Area Donated (sq. m.)	Location
T-166891	2,228	2,228	Barrio of Carig and Alimanao, Tuguegarao City, Cagayan
T-157380	1,838	1,838	
T-157381	1,265	1,265	
T-157382	823	823	
T-157383	1,350	1,350	
T-157384	713	713	
T-157385	1,525	1,525	
T-157386	2,315	2,315	
T-157387	1,530	1,530	
T-157388	1,488	1,488	
T-157389	1,441	1,441	

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T-157390	1,458	1,458	
T-157391	608	608	

being a gift in favor of a political subdivision 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 (DST) prescribed under Section 196 of the National Internal Revenue Code of 1997, as amended, but only to the DST 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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