REPUBLIC OF THE PHILIPPINES
DEPARTMENT OF FINANCE
BUREAU OF INTERNAL REVENUE
Quezon City

Certificate of Tax Exemption No.
0456-2019

CERTIFICATE OF TAX EXEMPTION

issued to

PROPERTY COMPANY OF FRIENDS, INC.
55 Tinio St., Additional Hills, Mandaluyong City 1550
TIN:

This certifies that donation under the Deed of Donation dated June 14, 2017, executed by PROPERTY COMPANY OF FRIENDS, INC. in favor of:

Name of Donee	TIN	Address
MUNICIPALITY OF LAMBUNAO		Lambunao, Iloilo 5042

covering the following property:

Original Certificate of Title	Area (sq.m.)	Area Donated (sq.m.)	Location
	125.140	125.140	Brgy. Tampucao, Lambunao, Iloilo

being a donation 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)[1] 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 Deeds of Donation are 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[2] 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 _____ day of AUG 2 8 2019, _____.

CAESAR R. DULAY
Commissioner of Internal Revenue
028092

K-1-JAC

[1] Now Section 101 (A)(1) of the Tax Code of 1997, as amended by Republic Act No. 10963

[2] The old DST rate of P15.00 is used since the donation took place prior to the effectivity of R.A. No. 10963