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

Certificate of Tax Exemption No.
DT- 0459-2020

CERTIFICATE OF TAX EXEMPTION

issued to

PIONEER VENTURES, INC.
Ciudades, Mandug, Davao City 8000
TIN:

This certifies that the donation under the Deed of Donation dated March 01, 2018, executed by PIONEER VENTURES, INC. in favor of:

Name of Donee	TIN	Address
PHILIPPINE ARMY		Headquarters 10th Infantry Division, CGMTY Sr., Brgy. Tuboran, Mawab, Compostella Valley

covering the following property:

Transfer Certificate of Title No.	Area (sq.m.)	Area Donated (sq.m.)	Location
	19,700	19,700	Buhangin: Manuel M. Garcia Road

being a gift in favor of an agency of the **National Government** institution is exempt from the payment of the donor's tax pursuant to Section 101 (A)(1)[1] 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 196 of the Tax Code of 1997, as amended, provides that transfers exempt from donor's tax under Section 101 (a) and (b) of the same Code shall be exempt from the documentary stamp tax imposed under said Section. Accordingly, the Deed of Donation is not subject to the documentary stamp tax prescribed under Section 196 of the 1997 Tax Code, as amended, but only to the documentary stamp tax of ₱30.00 imposed under Section 188 of the same Code, as amended by Republic Act No. 10963 or the TRAIN Law.

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 18 2020, _____.

CAESAR R. DULAY
Commissioner of Internal Revenue

K-1-JAC

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[1] Renumbered by Republic Act No. 10963.