August 30, 2019

CERTIFICATE OF TAX EXEMPTION NO. 469-19

CERTIFICATE OF TAX EXEMPTION
issued to

AAA and BBB

TIN: 000-000-000-000

This certifies that donation under the Deed of Donation dated April 11, 2017, executed by AAA and BBB in favor of:

Name of Donee	TIN	Address
Brgy. Santa Rita, Asturias, Cebu	000-000-000-000	Brgy. Santa Rita, Asturias, Cebu

covering the following property;

Lot Description	Area (sq.m.)	Area Donated (sq.m.)	Location	Tax Declaration No.
Lot No. 9522-Part, Cad. 878-D [1]	49,589	929	Brgy. Santa Rita, Asturias, Cebu	00-0000-00000

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) [2] 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 [3] 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

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void.

Issued this 30th day of August, 2019.

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

Footnotes

1. With Certificate of No Title issued by Land Registration Authority dated November 27, 2017.
2. Now Section 101 (A) (1) of the Tax Code of 1997, as amended by Republic Act No. 10963.
3. The old DST rate of P15.00 is used since the donation took place prior to the effectivity of R.A. No. 10963.

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