April 3, 2018

CERTIFICATE OF TAX EXEMPTION NO. 586-18

CERTIFICATE OF TAX EXEMPTION
issued to

AAA

TIN: 000-000-000-000

This certifies that the donation under the Deed of Donation dated April 13, 2013, executed by AAA in favor of:

Name of Donee	TIN	Address
Missionaries of the Poor, Inc.	000-000-000-000	San Rafael, Cararayan, Naga City 4400

covering the following property:

Transfer Certificate of Title	Area (sq.m.)	Area Donated (sq.m.)	Location
464	5,393	5,393	San Rafael, Cararayan, Naga City 4400

being a gift 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 TCT of the properties because failure to comply with such 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, 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 prescribed under Section 196 of the Tax Code, as amended, but only to the documentary stamp tax of P15.00 imposed under Section 188 of the same Code.

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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 3rd day of April, 2018.

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

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