October 10, 2019

CERTIFICATE OF TAX EXEMPTION NO. 586-19

CERTIFICATE OF TAX EXEMPTION
issued to

SANCHEZ VILLAGE HOMEOWNERS' ASSOCIATION, INC.
14 Sanchez St., Parang, Marikina City, Metro Manila 1809
TIN: 000-000-000-000

This certifies that donation under the Deed of Donation dated June 9, 2017, executed by SANCHEZ VILLAGE HOMEOWNERS' ASSOCIATION, INC. in favor of:

Name of Donee	TIN	Address
The City Government of Marikina	000-000-000-000	Shoe Ave., Sta. Elena, Marikina City

covering the following property (alleys):

Transfer Certificate of Title Nos.	Area (sq.m.)	Area Donated (sq.m.)	Location
439222	107	107	Sanchez, Julieta Subd., Fortune, Marikina City
439223	77	77	
439224	77	77	
439225	72	72	
439226	88	88	
439227	84	84	

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) (1) [1] of the Tax Code of 1997, as amended. Likewise, Section 31 of Presidential Decree No. 957, as amended by Presidential Decree No. 1216, mandates that roads and open spaces for subdivisions reserved for parks, playground and recreational use and which are classified as non-alienable and non-buildable shall upon their completion, be donated by the developer or owner to the City or

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Municipality where it is located.

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 1997 Tax Code, as amended.

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 10th day of October, 2019.

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

Footnotes

1. Renumbered by Republic Act No. 10963 or the TRAIN Law.
2. The Old DST rate of P15.00 shall be used since the donation took place prior to the effectivity of R.A. 10963 or TRAIN Law.

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