October 17, 2019

CERTIFICATE OF TAX EXEMPTION NO. 657-19

CERTIFICATE OF TAX EXEMPTION
issued to

Name of Donors	TIN	Address
AAA	000-000-000-000	_____
BBB	000-000-000-000	_____
CCC	000-000-000-000	_____
DDD	000-000-000-000	_____
EEE	000-000-000-000	_____

This certifies that the donation under the Deed of Donation dated June 14, 2017, executed by **Heirs of FFF**, represented by BBB, Attorney-in-Fact, in favor of:

Name of Donee	TIN	Address
City Gov't. of Puerto Princesa	000-000-000-000	City Hall Bldg., Sta. Monica Heights, Puerto Princesa City

covering the following properties:

Transfer Certificate of Title Nos.	Area (sq.m.)	Area Donated (sq.m.)	Location
074-2017000017	1,422	1,422	Brgy. San Jose, Puerto Princesa City
074-2017000018	1,222	1,222	Brgy. San Jose, Puerto Princesa City

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,

Copyright 2020 CD Technologies Asia, Inc.

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 Deed 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 17th day of October, 2019.

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

Footnotes

1. Now, Section 101 (A) (1), as renumbered by Republic Act No. 10963 or the TRAIN Law.
2. Old DST rate was used since the transaction took place prior to the effectivity of R.A. No. 10963.

Copyright 2020 CD Technologies Asia, Inc.