October 18, 2019

CERTIFICATE OF TAX EXEMPTION NO. 660-19

CERTIFICATE OF TAX EXEMPTION

TO ALL WHOM IT MAY CONCERN :

This certifies that the donation under the Deeds of Donation, both dated June 27, 2013, made and executed pursuant to Section 31 of Presidential Decree (PD) No. 957, as amended by PD No. 1216, by and between:

Name of Donor	TIN	Address
CITY & LAND DEVELOPERS, INC.	000-000-000-000	2/F & 3/F Cityland Condominium 10, Tower 1, 156 H.V. Dela Costa St., Ayala North, Makati City 1226

in favor of:

Name of Donee	TIN	Address
CITY GOVERNMENT OF PARAÑAQUE	000-000-000-000	Parañaque City

covering the following properties:

Transfer Certificate of Title (TCT) Nos.	Total Area (sq. m.)	Area Donated (sq. m.)	Location
68466	2,186.00	2,186.00	
68467	392.00	392.00	
68468	370.00	370.00	
68469	1,056.00	1,056.00	
68470	792.00	792.00	
68471	530.00	530.00	
68472	1,115.00	1,115.00	
68473	1,961.00	1,961.00	

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68474	1,215.00	1,215.00	Brgy. Ibayo, Parañaque City
68475	680.00	680.00	
68476	771.00	771.00	
68477	662.00	662.00	
68478	273.00	273.00	
65843	81.00	81.00	
65844	81.00	81.00	
65850	81.00	81.00	
65851	81.00	81.00	
65854	81.00	81.00	
65855	81.00	81.00	
140851	246.88	246.88	
140852	244.79	244.79	
140854	80.59	80.59	
108086	726.00	726.00	Brgy. La Huerta, Parañaque City
108174	475.00	475.00	
108118	450.00	450.00	
108175	276.50	276.50	
108178	400.00	400.00	
108179	1,474.50	1,474.50	
108176	32.00	32.00	
140669	82.00	82.00	

being gifts 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 National Internal Revenue Code (NIRC) 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, 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 (DST) prescribed under Section 196 of the NIRC of 1997, as amended, but only to the DST 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 18th day of October, 2019.

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

Footnotes

1. Now Section 101 (A) (1) of the NIRC of 1997, as amended by Republic Act (RA) No. 10963.
2. The old rate of P15.00 is used since the donations took place prior to the effectivity of RA No. 10963.

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