May 17, 2018

CERTIFICATE OF TAX EXEMPTION NO. 827-18

CERTIFICATE OF TAX EXEMPTION
issued to

MUNICIPAL GOVERNMENT OF SOLANA, CAGAYAN
Municipality of Solana, Cagayan
TIN: 000-000-000-000 [1]

This certifies that the donation under the Deed of Donation dated December 09, 2015 [2] executed by the **MUNICIPAL GOVERNMENT OF SOLANA, CAGAYAN** in favor of:

Name of Donee	TIN	Address
DASSUN NATIONAL HIGH SCHOOL	000-000-000-000 [3]	Dassun, Solana, Cagayan

covering the following property:

Original Certificate of Title (OCT)	Area (sq. m.)	Location
0-3466 [4]	5,754	Solana, Cagayan

being a donation in favor of an agency of the Government, is exempt from the payment of the donor's tax pursuant to Section 101 (A) (2) of the National Internal Revenue 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, 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 National Internal Revenue Code of 1997, as amended, but only to the documentary stamp tax of P15.00 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.

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Issued this 17th day of May, 2018.

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

Footnotes

1. TIN of the Local Government Unit of Solana.
2. Date of Notarization.
3. TIN of the Department of Education, Cagayan Division.
4. Portion of OCT No. 0-3466 with an area of 10,881 sq. m., more or less.

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