REPUBLIC OF THE PHILIPPINES
DEPARTMENT OF FINANCE
BUREAU OF INTERNAL REVENUE
Quezon City

Certificate of Tax Exemption No.
338-2018

CERTIFICATE OF TAX EXEMPTION

issued to

ROMAN CATHOLIC ARCHBISHOP OF CEBU-
MOST REV. JOSE S. PALMA, DD.
910 Reina Regente, Binondo, Manila 1006234 D. Jakosalem St., Cebu City
TIN:

This certifies that donation under the Deed of Donation dated October 19, 2014 executed by the **ROMAN CATHOLIC ARCHBISHOP OF CEBU- MOST REV. JOSE S. PALMA, DD.,** represented by Most Rev. Jose S. Palma, DD. in favor of:

Name of Donee	TIN	Address
Redemptorist Vismin Church, Inc.		General Maxilom Avenue, Cebu City

covering the following property;

Transfer Certificate of Title	Area (sq.m.)	Area Donated (sq.m.)	Location
	7,920	7,920	Busay , Cebu City
	1,236	1,236	Lahug, Cebu City
	823	823	Kamputhaw, Cebu City
	952	952	Pagsabungan, Mandaue City
	10,174	10,174	Pagsabungan, Mandaue City
	15,215	15,215	Pagsabungan, Mandaue City
	4,061	4,061	Babag, Cebu City
	1,529	1,529	Cebu City
	3,867	3,867	Cebu City
	2,195	2,195	Kamputhaw, Cebu City
	3,491	3,491	Kamputhaw, Cebu City
	15,650	15,650	Kamputhaw, Cebu City
	42, 532	42, 532	Lahug, Cebu City
	325	325	Nivel, Cebu City
	21,192	21,192	Nivel, Cebu City

being a donation 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 Transfer Certificates of Title because failure to comply with said 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 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 Deed of Donation is 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 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 _____ day of MAR 07 2018.

CAESAR R. DULAY
Commissioner of Internal Revenue

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