

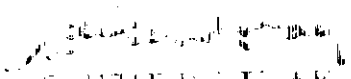
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However, the Department of Agrarian Reform (DAR), the implementing agency of the Comprehensive Agrarian Reform Program (CARP), certified on February 12, 1995 that the subject property is a reversion area and is not covered by CARP since the property is less than 10 (5) hectares. Accordingly, the tax incentive granted under Section 56 of Republic Act No. 6397 of the Comprehensive Agrarian Reform Law has no application to the property.

In view of the foregoing, the Bureau of the Legislature of their property in your favor as subject donors is pursuant to Section 94 (B) of the Tax Code of 1997 as amended.

This ruling is being issued on the basis of the foregoing facts as represented above. If upon investigation, it will be ascertained that the facts are different, then this ruling shall be considered null and void.

Very truly yours,


CAESAR R. LULAY
Commissioner of Internal Revenue

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