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

Certificate of Tax Exemption No.
585-2017

CERTIFICATE OF TAX EXEMPTION

TO ALL WHOM IT MAY CONCERN:

This certifies that the donation under the Deed of Donation dated August 21, 2017, executed by **WILSON R. CAYAGO** in favor of:

Name of Donee	TIN	Address
IGLESIA NI CRISTO (CHURCH OF CHRIST)		No. 1, Central Avenue, New Era, Quezon City

covering the following property:

Original Certificate of Title (OCT)	Area (sq. m.)	Location
	2,808	Barangay Galicia, Mendez, Cavite

being gift in favor of a religious corporation, is exempt from the payment of the donor's tax pursuant to Section 101 (A) (3) of the National Internal Revenue Code of 1997, as amended, subject to the condition that not more than thirty percent (30%) of the 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 Certificate of Title (TCT) of the property 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, 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 (DST) prescribed under Section 196 of the National Internal Revenue Code of 1997, as amended, but only to the DST 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 DEC 12 2017.

CAESAR R. DULAY
Commissioner of Internal Revenue

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