

REPUBLIC OF THE PHILIPPINES
Court Of Tax Appeals
QUEZON CITY

FORMER SECOND DIVISION

Team SUAL CORPORATION C.T.A. CASE NO. 7620
(Formerly: Mirant Sual Corporation and
Southern Energy Pangasinan, Inc.),

Petitioner, Members:

-versus-

CASTAÑEDA, JR., Chairperson
UY, and
PALANCA-ENRIQUEZ, JJ.

COMMISSIONER OF INTERNAL
REVENUE,

Respondent.

Promulgated:

APR 23 2010

4:15 p.m.

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DECISION

PALANCA-ENRIQUEZ, J.:

Section 112 (A) of the NIRC of 1997, as amended, expressly provides that unutilized input VAT payments, not otherwise used for internal revenue tax due the taxpayer, must be claimed within two (2) years reckoned from the close of the taxable quarter when the relevant sales were made pertaining to the input VAT regardless of whether said tax was paid or not. The reckoning frame would always be the end of the quarter when the sales were made regardless when the input VAT was

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paid. Further, both the administrative claim and judicial claim for refund must be filed within the two (2) year period.

THE CASE

This is a Petition for Review filed by petitioner TeaM Sual Corporation (Formerly: Mirant Sual Corporation and Southern Energy Pangasinan, Inc.) praying for a refund or issuance of a tax credit certificate in the total amount of P103,588,530.59, representing unutilized input VAT paid on its domestic purchases of capital goods, domestic purchases of goods other than capital goods, domestic purchases of services, services rendered by non residents, importation of capital goods and importation of goods other than capital goods attributable to its zero-rated sales for the period from January 1, 2005 to October 31, 2005.

THE PARTIES

Petitioner is a domestic corporation duly organized and existing under and by virtue of Philippine laws with principal office at Bo. Pangascasan, Sual, Pangasinan. Petitioner was originally registered with the SEC under the name of Pangasinan Electric Corporation, which was changed to Southern Energy Pangasinan, Inc., then to Mirant Sual Corporation. During the pendency of this case, it again changed its corporate name to TeaM Sual Corporation on July 23, 2007.



Respondent, on the other hand, is the duly appointed Commissioner of Internal Revenue, vested with authority to act on and approve claims for refund or issuance of tax credit certificate of overpaid internal revenue taxes as provided by law, with office address at the BIR National Office Building, Agham Road, Diliman, Quezon City.

THE FACTS

The antecedent facts of the case are as follows:

Petitioner is principally engaged in the business of power generation and subsequent sale thereof to National Power Corporation (NPC) under a Build, Operate, Transfer (BOT) scheme. As such, it is principally registered with the BIR as a VAT taxpayer, in accordance with Section 107 of the NIRC of 1997, as amended, with Tax Identification No. 003-841-103.

On December 17, 2004, petitioner filed with the BIR Audit Information Tax Exemption and Incentives Division an Application for Effective Zero-Rate of its supply of electricity to the NPC for the period January 1, 2005 to October 31, 2005, which was subsequently approved.

On December 21, 2006, petitioner filed an administrative claim for refund of unutilized input VAT with the Revenue District Office No. 5, at



Alaminos City in the total amount of P103,588,530.59 for the period January 1, 2005 to October 31, 2005.

In order to preserve its right and to toll the running of the prescriptive period for its judicial claim, petitioner filed the instant Petition for Review on April 18, 2007.

In his Answer filed on May 28, 2007, respondent, by way of special and affirmative defenses, averred that the CTA has no jurisdiction to entertain the instant petition for review for failure of petitioner to comply with *Section 112 (D) of the NIRC of 1997, as amended*; that the administrative claim for refund with the BIR was filed on December 21, 2006, subsequently, the instant petition was filed on April 15, 2007, obviously, the 120 days given to Commissioner to decide on the claim has not yet lapsed when the petition was filed; hence, the petition was prematurely filed and must be dismissed for lack of jurisdiction.

Petitioner presented Taryn Uberita and Emmanuel Mendoza, as witnesses, and documentary evidence marked as Exhibits "A" to "XX", inclusive of their submarkings, which were admitted by the Court, except for Exhibits "W" to "Z", "EE" to "HH", and their submarkings, for failure of the petitioner to identify the same during trial.



Upon motion of counsel for the petitioner, respondent's right to present evidence was considered waived for his repeated failure to appear at the trial for the presentation of his evidence.

Thereafter, both parties were ordered to file their simultaneous memoranda, within thirty (30) days from notice. Considering petitioner's "Memorandum" filed on March 20, 2009 and respondent's "Memorandum" filed on May 4, 2009, the case was deemed submitted for decision on May 12, 2009.

Hence, this decision.

ISSUES

As stipulated upon by the parties, the following are the issues for this Court's consideration:

I

WHETHER OR NOT THE POWER GENERATION SERVICES RENDERED BY PETITIONER FOR THE PERIOD JANUARY 1, 2005 TO OCTOBER 31, 2005 TO NPC, MIRANT PHILIPPINES ENERGY CORPORATION, MIRANT PHILIPPINES INDUSTRIAL POWER CORPORATION, AND MIRANT PHILIPPINES INDUSTRIAL POWER II CORPORATION ARE SUBJECT TO ZERO PERCENT (0%) VAT PURSUANT TO RA NO. 6395, AND THE EPIRA, AND ITS IMPLEMENTING RULES AND REGULATIONS.



II

WHETHER OR NOT PETITIONER HAD UTILIZED INPUT VAT FOR THE PERIOD JANUARY 1, 2005 TO OCTOBER 31, 2005 IN THE TOTAL AMOUNT OF P103,588,530.59 WHICH ARE ATTRIBUTABLE TO PETITIONER'S ZERO RATED SALES OF POWER GENERATION SERVICES TO NPC, MIRANT PHILIPPINES ENERGY CORPORATION, MIRANT PHILIPPINES INDUSTRIAL POWER CORPORATION, AND MIRANT PHILIPPINES INDUSTRIAL POWER II CORPORATION PURSUANT TO RA NO. 6395, AND THE EPIRA, AND ITS IMPLEMENTING RULES AND REGULATIONS.

III

WHETHER OF NOT THE ADMINISTRATIVE CLAIM FOR REFUND FILED BY PETITIONER WITH REVENUE DISTRICT OFFICE NO. 5 AT ALAMINOS CITY ON DECEMBER 21, 2006 IN THE AMOUNT OF p103,588,530.59 AND THE INSTANT PETITION FOR REVIEW WERE SEASONABLY FILED.

IV

WHETHER OR NOT THE UNUTILIZED CREDITABLE INPUT TAXES FOR THE PERIOD JANUARY 1, 2005 TO OCTOBER 31, 2005 IN THE TOTAL AMOUNT OF P103,588,530.59 ARE PROPERLY SUBSTANTIATED BY INVOICES AND OFFICIAL RECEIPTS.

V

WHETHER OR NOT THE UNUTILIZED INPUT VAT PAYMENTS FOR THE PERIOD JANUARY 1, 2005 TO OCTOBER 31, 2005 IN THE TOTAL AMOUNT OF P103,588,530.59 WERE CARRIED OVER TO AND



UTILIZED IN THE SUCCEEDING TAXABLE QUARTER(S) ARE APPLIED AGAINST ANY OF THE OUTPUT VAT LIABILITY OF THE PETITIONER.

VI

WHETHER OR NOT PETITIONER IS ENTITLED TO A REFUND AND/OR ISSUANCE OF TAX CREDIT CERTIFICATE FOR THE UNUTILIZED INPUT VAT PAYMENTS IN THE TOTAL AMOUNT OF P103,588,530.59.

Principal Issue

The foregoing issues raised by both parties boil down to the principal issue of whether or not petitioner is entitled to a refund or issuance of a tax credit certificate in the aggregate amount of P103,588,530.59, representing unutilized excess input VAT attributable to zero-rated sales for the second and third quarters and the month of October for taxable year 2005.

THE COURT'S RULING

The petition is partly meritorious.

Petitioner anchors its claim on *Section 112(A) of the National Internal Revenue Code (NIRC) of 1997, as amended*, which provides, as follows:

“SEC. 112. Refunds or Tax Credits of Input Tax.”



(A) Zero-rated or Effectively Zero-rated Sales. –
Any VAT-registered person, whose sales are zero-rated or effectively zero-rated may, within two (2) years after the close of the taxable quarter when the sales were made, apply for the issuance of a tax credit certificate or refund of creditable input tax due or paid attributable to such sales, except transitional input tax, to the extent that such input tax has not been applied against output tax: *Provided, however,* That in the case of zero-rated sales under Section 106(A)(2)(a)(1),(2) and (B) and Section 108(B)(1) and (2), the acceptable foreign currency exchange proceeds thereof had been duly accounted for in accordance with the rules and regulations of the Bangko Sentral ng Pilipinas (BSP): *Provided further,* That where the taxpayer is engaged in zero-rated or effectively zero-rated sale and also in taxable or exempt sale of goods or properties or services, and the amount of creditable input tax due or paid cannot be directly and entirely attributed to any one of the transactions, it shall be allocated proportionately on the basis of volume of sales.”

Pursuant to the above provision, in order to be entitled to a refund or tax credit certificate of input VAT attributable to zero-rated or effectively zero-rated sales, the following requisites must be complied with:

- 1) there must be zero-rated or effectively zero-rated sales;
- 2) that input taxes were incurred or paid;
- 3) that such input taxes are attributable to zero-rated sales or effectively zero-rated sales;
- 4) that the input taxes were not applied against any output VAT liability; and



5) that the claim for refund was filed within the two-year prescriptive period.

Fifth Requisite:

Claim for refund was filed
within the two-year period

This Court finds it appropriate to determine first the timeliness of the filing of the instant claim.

Clearly, *Section 112 (A)* provides that the taxpayer may apply for a refund or issuance of a tax credit certificate, within two (2) years from the close of the taxable quarter when the importation or purchase was made.

In the recent case of *Commissioner of Internal Revenue vs. Mirant Pagbilao Corporation (Formerly Southern Energy Quezon, Inc.)*, 565 SCRA 154, the Supreme Court settled the issue on the reckoning of the prescriptive period and the applicable provisions of claims for refund for input VAT, as follows:

“Claim for refund or tax credit filed out of time

The claim for refund or tax credit for the creditable input VAT payment made by MPC embodied in OR No. 0189 was filed beyond the period provided by law for such claim. Sec. 112(A) of the NIRC pertinently reads:

(A) *Zero-rated or Effectively Zero-rated Sales.*

– Any VAT-registered person, whose sales are zero-rated or effectively zero-rated may, **within two (2) years after the close of the taxable quarter when the sales were made**, apply for the issuance of a tax



credit certificate or refund of creditable input tax due or paid attributable to such sales, except transitional input tax, to the extent that such input tax has not been applied against output tax: x x x.
(Emphasis ours.)

The above proviso clearly provides in no uncertain terms that unutilized input VAT payments not otherwise used for any internal revenue tax due the taxpayer must be claimed within two years **reckoned from the close of the taxable quarter when the relevant sales were made pertaining to the input VAT regardless of whether said tax was paid or not.** As the CA aptly puts it, albeit it erroneously applied the aforequoted Sec. 112(A), '[P]rescriptive period commences from the close of the taxable quarter when the sales were made and not from the time the input VAT was paid nor from the time the official receipt was issued.' Thus, when a zero-rated VAT taxpayer pays its input VAT a year after the pertinent transaction, said taxpayer only has a year to file a claim for refund or tax credit of the unutilized creditable input VAT. The reckoning frame would always be the end of the quarter when the pertinent sales or transaction was made, regardless when the input VAT was paid. Be that as it may, and given that the last creditable input VAT due for the period covering the progress billing of September 6, 1996 is the third quarter of 1996 ending on September 30, 1996, any claim for unutilized creditable input VAT refund or tax credit for said quarter prescribed two years after September 30, 1996 or, to be precise, on September 30, 1998. Consequently, MPC's claim for refund or tax credit filed on December 10, 1999 had already prescribed.

**Reckoning for prescriptive period under
Secs. 204(C) and 229 of the NIRC inapplicable**

To be sure, MPC cannot avail itself of the provisions of either Sec. 204(C) or 229 of the NIRC which, for the purpose of refund, prescribes a different starting point for



the two-year prescriptive limit for the filing of a claim therefor. Secs. 204(C) and 229 respectively provide:

Sec. 204. *Authority of the Commissioner to Compromise, Abate and Refund or Credit Taxes.*— The Commissioner may —

X X X X

(c) Credit or refund taxes erroneously or illegally received or penalties imposed without authority, refund the value of internal revenue stamps when they are returned in good condition by the purchaser, and, in his discretion, redeem or change unused stamps that have been rendered unfit for use and refund their value upon proof of destruction. **No credit or refund of taxes or penalties shall be allowed unless the taxpayer files in writing with the Commissioner a claim for credit or refund within two (2) years after the payment of the tax or penalty:** Provided, however, That a return filed showing an overpayment shall be considered as a written claim for credit or refund.

X X X X

Sec. 229. *Recovery of Tax Erroneously or Illegally Collected.*— No suit or proceeding shall be maintained in any court for the recovery of any national internal revenue tax hereafter alleged to have been erroneously or illegally assessed or collected, or of any penalty claimed to have been collected without authority, or of any sum alleged to have been excessively or in any manner wrongfully collected without authority, or of any sum alleged to have been excessively or in any manner wrongfully collected, until a claim for refund or credit has been duly filed with the Commissioner; but such suit or proceeding may be maintained, whether or not such tax, penalty, or sum has been paid under protest or duress.

In any case, **no such suit or proceeding shall be filed after the expiration of two (2) years from the date of payment of the tax or penalty** regardless of any supervening cause that may arise after payment: Provided, however, That the Commissioner may, even without a written claim therefor, refund or credit any

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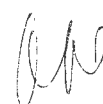
tax, where on the face of the return upon which payment was made, such payment appears clearly to have been erroneously paid. (Emphasis ours.)

Notably, the above provisions also set a two-year prescriptive period, reckoned from date of payment of the tax or penalty, for the filing of a claim of refund or tax credit. Notably too, both provisions apply only to instances of erroneous payment or illegal collection of internal revenue taxes.”

Evidently, *Section 112 (A) of the NIRC of 1997*, as amended, clearly provides in no uncertain terms that unutilized input VAT payments not otherwise used for internal revenue tax due the taxpayer must be claimed within two (2) years reckoned from the close of the taxable quarter when the relevant sales were made or capital goods were imported or locally purchased pertaining to the input VAT, regardless of whether said tax was paid or not. The reckoning frame would always be the end of the quarter when the sales were made or capital goods were imported or locally purchased, regardless when the input VAT was paid.

In this case, petitioner is claiming for the input VAT accumulated from January 1, 2005 to October 31, 2005, hence, the counting of the two (2) year prescriptive period is, as follows:

Period covered	Reckoning date	Last day to file a claim (both administrative & judicial)
January 1 to March 31, 2005 (First Quarter)	March 31, 2005	March 31, 2007



April 1 to June 30, 2005 (Second Quarter)	June 30, 2005	June 30, 2007
July 1 to September 30, 2005 (Third Quarter)	September 30, 2005	September 30, 2007
October 1- 31, 2005	December 31, 2005	December 31, 2007

Records show that petitioner filed its administrative claim on December 21, 2006 (*Exhibit "B"*) and the present *Petition for Review* on April 18, 2007. Clearly, petitioner's administrative claim for the first three (3) quarters of 2005 and for the month of October 2005 was filed within the prescriptive period of two (2) years. However, petitioner's judicial claim for the first quarter of 2005 was filed out of time. Therefore, petitioner is barred from claiming refund of its input taxes for the first quarter of 2005 in the amount of P18,738,140.02 due to prescription.

First Requisite:

*There must be zero-rated or
effectively zero rated sales*

As regards the first requisite, petitioner contends that its sale of services to NPC qualifies for VAT zero-rating, pursuant to *Section 108 (B) (3) of the NIRC of 1997, as amended*, which provides:

**“SEC. 108. Value-added Tax on Sale of Services
and Use or Lease of Properties.-**

xxx

xxx



(B) Transactions Subject to Zero Percent (0%) Rate.- The following services performed in the Philippines by VAT-registered persons shall be subject to zero percent (0%) rate:

xxx xxx

(3) Services rendered to persons or entities whose exemption under special laws or international agreements to which the Philippines is a signatory effectively subjects the supply of such services to zero percent (0%) rate;

xxx xxx.”

It is well settled that NPC is exempt from payment of all kinds of taxes, both direct and indirect (*Maceda vs. Macaraig*, 223 SCRA 236), to wit:

“The use of the phrase ‘all forms’ of taxes demonstrates the intention of the law to give NPC all the tax exemption it has been enjoying before. The rationale for this exemption is that being non-profit the NPC ‘shall devote all its returns from its capital investment as well as excess revenues from its operation, for expansion.’

xxx xxx

It is evident from the provisions of PD No. 938 that its purpose is to maintain the tax exemption of NPC from all forms of taxes including indirect taxes as provided for under R.A. No. 6395 and P.D. No. 380 if it is to attain its goals.

xxx xxx.”



Petitioner further presented its Application for VAT Zero-Rate (*Exhibit "A"*) to prove that the BIR approved its application for zero-rating for the period from January 1, 2005 to October 31, 2005 for its sales to NPC.

Petitioner also claims that its sale of electricity, as a generation company, to other companies other than the NPC, qualifies for VAT zero-rating under *paragraph 5, Section 6 of RA 9136 (EPIRA Law)*, which states:

“SEC. 6. *Generation Sector.* xxx

xxx xxx

Pursuant to the objective of lowering electricity rates to end-users, sales of generated power by generation companies shall be value added tax zero-rated.

xxx xxx.”

To qualify for VAT zero-rating under the EPIRA law, petitioner must be able to establish that: 1) it is a generation company and 2) it derives sales from power generation.

1) *Generation Company*

Section 4 of RA 9136 provides:

“SEC. 4. *Definition of Terms.* –

xxx xxx



(w) "Generation Company" refers to any person or entity ***authorized by the ERC*** to operate facilities used in the generation of electricity;" (*Emphasis supplied*)

As regards the first requisite, petitioner failed to establish that it is a generation company in accordance with *RA 9136*. Petitioner failed to present any proof that it was registered with the Energy Regulatory Commission (ERC), pursuant to *Section 4 of RA 9136*, in relation to *Section 6 (b) Rule 5 of the IRR*, nor did it present any document to prove that it was accredited by the Department of Energy.

Moreover, petitioner's claim under the EPIRA Law is being raised for the first time in this Court, it was never raised at the administrative level. Notably, in its administrative claim for refund with the BIR, only petitioner's sales to NPC were raised, as subject to zero-percent VAT, hence, it cannot raise the issue of its zero-rated sales to other companies, pursuant to the EPIRA Law for the first time in this Court. It is well settled that under the principle of prior exhaustion of administrative remedies, questions or issues not raised in the administrative level cannot be raised for the first time in the judicial level. To allow a litigant to assume a different posture when he comes before the court and challenge the position he had accepted at the administrative level, would be to sanction a procedure whereby the Court—which is supposed to review



administrative determinations—would not review, but determine and decide for the first time, a question not raised at the administrative forum (*Commissioner of Internal Revenue vs. Wander Philippines, Inc.*, 160 SCRA 573). Thus, petitioner's sales of generated power to Mirant Philippines Energy Corporation, Mirant Philippines Industrial Power Corporation, and Mirant Philippines Industrial Power II Corporation, cannot be claimed as zero percent (0%) VAT under the EPIRA Law.

2) Derives sales from power generation

As regards the second requisite, records show that for the three quarters of taxable year 2005 until October of the same year, petitioner generated sales of power generation services to NPC and various companies in the total amount of P12,276,041,728.09, which was declared in its Quarterly VAT Returns for the three (3) quarters and the Monthly VAT Return for the month of October, as follows:

Exhibit	Year 2005	Zero-Rated Sales/Receipts
C	1 st Quarter	3,775,412,124.01
D	2 nd Quarter	3,600,420,391.50
E	3 rd Quarter	3,700,406,077.70
I	month of October	1,199,803,134.88
TOTAL		12,276,041,728.09

The ICPA found a marked discrepancy between the total zero-rated receipts of P11,007,487,989.41 reflected in petitioner's books of accounts

and the total zero-rated receipts of P12,276,041,728.09 declared by petitioner in its 2005 Quarterly VAT Returns. In his report, the ICPA reconciled the amounts reported in the Quarterly VAT returns with the amounts recorded in the books as gross receipts, as follows:

"Total Amounts reported in the Quarterly VAT Returns		P12,276,041,728.09
Add: Receivables, October 31, 2005	1,295,912,485.40	
Accrual of current year's revenue	45,311,352.37	1,341,223,837.77
Less: Receivables, beginning	1,330,191,291.35	
Reversal of previous year's accrual of Revenue	1,273,229,991.31	
Foreign exchange difference	6,356,293.79	(2,609,777,576.45)
Sales per books		P11,007,487,989.41

The difference of P1,263,553,738.68 is mainly attributable to the accrual basis of accounting used in reporting zero-rated sales in the Company's books as against the actual receipts reported in the quarterly VAT Returns." (*Exhibit "G", pp. 12-13*)

Considering the above findings of this Court, we are constrained to deduct the amount corresponding to the zero-rated sales for the first quarter due to prescription, and the alleged zero-rated sales which did not qualify for zero-rating for failure of petitioner to prove its entitlement under the EPIRA Law and for petitioner's failure to exhaust administrative remedies. The total disallowed amount of P4,057,987,717.64, is computed as follows:



1 st Quarter (due to prescription)		P3,775,412,124.01
2nd Quarter		
	MPIPC	3,004,545.95
	MPIP-II C	44,795,375.78
	MPEC	114,713,450.45
		162,513,372.18
3rd Quarter		
	MPEC	84,751,495.71
	MPIPC	1,109,534.31
	MPIP-II C	22,687,895.82
		108,548,925.84
October		
	MPIP-II C	11,513,295.61
TOTAL		P4,057,987,717.64

Only petitioner's sales of electricity to NPC, as a power generation company, for the second and third quarters, and the month of October all for the year 2005, in the total amount of P8,218,054,010.45, qualify for VAT zero-rating, thus:

Claimed Zero Rated Sales	P12,276,041,728.09
Less: Deductions	4,057,987,717.64
Substantiated Zero- Rated Sales	P8,218,054,010.45

Second and Third Requisites:

Input taxes were incurred or paid and
that such input taxes are attributable to
zero-rated sales or effectively zero-rated sales

We now proceed to the determination of the amount of input VAT attributable thereto.

Petitioner submitted various suppliers' invoices, official receipts, Bureau of Customs (BOC) Import Entries and Internal Revenue Declarations (IEIRDs), BOC and bank official receipts (*Exhibits "S" to*

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"V", with submarkings, as summarized in Exhibits "O" to "R"), in support of its claimed unutilized input taxes reflected in its Quarterly VAT Returns for the four quarters of 2005, in the amount of P103,588,530.59, broken down, as follows:

PERIOD COVERED	CLAIMED INPUT TAX
1st quarter	P18,738,140.02
2nd quarter	34,033,077.52
3rd quarter	37,548,063.34
October	13,269,249.71
TOTAL	P103,588,530.59

Upon perusal of said documents, the Court-Commissioned Independent CPA Emmanuel Mendoza found that out of the claimed amount of P103,588,530.59, only the amount of P102,894,131.30 (*ICPA Report, Exhibit "J" [erroneously marked as Exhibit "G"], pp. 4-8*) is properly substantiated. The findings of the ICPA as to the disallowance of claimed input VAT amounting to P694,399.29 are further reduced to P348,163.67, after deducting the disallowances corresponding to the prescribed claim for first quarter of 2005, which is hereby summarized, as follows:

DISALLOWANCES PER INDEPENDENT CPA'S REPORT

FINDINGS	INPUT TAX
Domestic purchases of services supported by documents other than Ors	P3,641.48
Domestic purchases of goods supported by documents other than invoices	35,583.92
Domestic purchases of goods supported by invoices with no BIR authority to print	56,408.33

Domestic purchases of services supported by Ors w/preprinted Non-VAT/NV	6,263.67
Domestic purchases of goods supported by invoices w/preprinted Non-VAT/NV	1,697.82
Domestic purchases of services supported by Ors w/preprinted "TIN" only	9,090.91
Domestic purchases of goods supported by invoices with preprinted "TIN" only	139.82
Domestic purchases of goods supported by VAT invoices with no "TIN"	2,625.00
Domestic purchases of services supported by Ors with zero rated "TIN"	717.97
Unaccounted Input VAT for Domestic purchases of services	1,416.22
Unaccounted Input VAT for Domestic purchases of goods	2,603.31
Domestic purchases of services and goods with No available supporting documents	155,528.22
Importation of goods with no available supporting documents	72,447.00
TOTAL	P 348,163.67

Considering that petitioner's input VAT claim for the first quarter of 2005 had already prescribed, the claimed input VAT amounting to P18,738,140.02 for the first quarter should totally be deducted. Likewise, the Court also finds that the input VAT claim should be further decreased by P4,098,113.50 (*Annexes "A" to "C" of this Decision*), for claims supported by VAT official receipts and invoices, but which had already prescribed or are outside the period of claim, thus:

Type of Input VAT	Annex	Input VAT
First Quarter		P 18,738,140.02
Second Quarter		
Input VAT on purchases of services	A	140,767.08
Input VAT on purchases of goods	A-1	2,605,989.48
Input VAT on importations	A-2	835,143.00
Third Quarter	B	
Input VAT on purchases of services		9,379.50
Input VAT on purchases of goods		27,186.87
Input VAT on importations		136,930.00

October	C	
Input VAT on purchases of services		314,172.30
Input VAT on purchases of goods		227.27
Input VAT on importations		28,318.00
TOTAL (Additional Disallowance)		P 22,836,253.52

Based on the foregoing, out of petitioner's claimed input VAT of P103,588,530.59, only the amount of P80,404,113.40 has been duly substantiated, in accordance with *Sections 110(A) and 113(A)* of the *NIRC of 1997, as amended*, and as implemented by *Sections 4.104-5 and 4.108-1 of Revenue Regulations No. 7-95*, broken down as follows:

Claimed input VAT		P103,588,530.59
Less: Disallowances		
Per ICPA	348,163.67	
Per Court's verification	22,836,253.52	23,184,417.19
Valid input VAT		P80,404,113.40

Fourth Requisite:

Input taxes were not applied
against any output VAT liability

As regards the fourth requisite, a perusal of petitioner's Quarterly VAT Returns for the second and third quarters of 2005 and the month of October 2005 (*Exhibits "D", "E", and "I"*) shows that petitioner incurred an output tax liability amounting to P218,935.35. However, records show that such output tax has not yet been deducted from petitioner's claim. Such output tax should be offset against the substantiated input VAT of P80,404,113.40. Thus, only the net input VAT in the amount of

P80,185,178.05 is unutilized or unapplied, as of the fourth quarter of 2005.

Moreover, the substantiated claim of P80,185,178.05 forms part of the P206,891,158.45 (P103,302,627.88 for C.T.A. Case No. 7470 and P103,588,530.59 for the instant case) input VAT deducted as "Any VAT Refund/TCC Claimed" in the Quarterly VAT Return for the fourth quarter of 2005 (*Exhibit "G"*). Consequently, records show that the claimed input VAT was no longer carried over to the succeeding quarters of 2006 and 2007 (*Exhibits "MM" to "SS"*). This means that the substantiated claim of P80,185,178.05 can no longer be used as credit against petitioner's future output VAT liability.

For all the foregoing, the Court finds that petitioner is entitled to a refund or issuance of a Tax Credit Certificate representing unutilized input VAT attributable to zero-rated sales for the second and third quarters and the month of October of taxable year 2005, but in the reduced amount of P77,519,684.39, computed, as follows:

Amount of Claim		P103,588,530.59
Less: Prescribed Claim (1st Quarter)		18,738,140.02
Unprescribed Claim		84,850,390.57
Less: Disallowances		
Per ICPA	348,163.67	
Per Court's verification	4,098,113.50	4,446,277.17
Valid Input VAT		P80,404,113.40

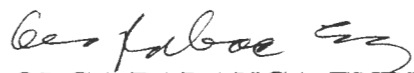
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Less: Output VAT	218,935.35
Excess Input VAT	P 80,185,178.05

Substantiated Zero-rated Sales	P8,218,054,010.45
Total Declared Zero-rated Sales	÷ 8,500,629,604.08
Excess Input VAT	x 80,185,178.05
REFUNDABLE EXCESS INPUT VAT Attributable to Zero-Rated Sales	P77,519,684.39

WHEREFORE, premises considered, the present Petition for Review is **PARTLY GRANTED**. Accordingly, respondent Commissioner of Internal Revenue is hereby **ORDERED TO REFUND OR ISSUE A TAX CREDIT CERTIFICATE** in favor of petitioner in the reduced amount of **SEVENTY SEVEN MILLION FIVE HUNDRED NINETEEN THOUSAND SIX HUNDRED EIGHTY FOUR and 39/100 PESOS (P77,519,684.39)**, representing unutilized input VAT attributable to zero-rated sales for the second and third quarters and the month of October of taxable year 2005.

SO ORDERED.


OLGA PALANCA-ENRIQUEZ
Associate Justice

WE CONCUR:


JUANITO C. CASTANEDA, JR.
Associate Justice

(On Leave)
ERLINDA P. UY
Associate Justice

ATTESTATION

I attest that the conclusions in the above Decision were reached in consultation before the cases were assigned to the writer of the opinion of the Court's Division.


JUANITO C. CASTANEDA, JR.
Associate Justice
Chairperson

CERTIFICATION

Pursuant to Article VIII, Section 13 of the Constitution, and the Division Chairman's Attestation, it is hereby certified that the conclusions in the above Decision were reached in consultation before the cases were assigned to the writer of the opinion of the Court's Division.


ERNESTO D. ACOSTA
Presiding Justice

SUMMARY OF ADDITIONAL DISALLOWANCES

FOR PRESCRIBED CLAIM OR OUTSIDE OF THE PERIOD COVERED

ANNEX "A"

SECOND QUARTER

Input VAT on purchases of services

Supplier's Name	Exh No.	OR No.	OR Date	Input tax
Alexander Consulting Group	T-10	185	22-Mar-05	5000
Asian Cable Comm. Inc.	T-29	29534	30-Mar-05	3,432.58
Cable Box Office Shows & Systems Corp.	T-41	39185	31-Mar-05	3,680.22
Cable Box Office Shows & Systems Corp.	T-41	39185	31-Mar-05	743.52
Cargohaus	T-46	2084	30-Mar-05	49.6
DHL Worldwide Express	T-100	283089	30-Mar-05	442.65
Equalizer Detective & Security Agency, Inc.	T-141	14638	18-Mar-05	49
Equalizer Detective & Security Agency, Inc.	T-141	14638	18-Mar-05	68,729.55
Equalizer Detective & Security Agency, Inc.	T-141	14638	18-Mar-05	3,681.82
Far East Hotel Mgmt & Consultancy	T-152	1478	22-Mar-05	106.91
Far East Hotel Mgmt & Consultancy	T-170	13093	21-Mar-05	150
Far East Hotel Mgmt & Consultancy	T-170	13093	21-Mar-05	335.45
Far East Hotel Mgmt & Consultancy	T-170	13093	21-Mar-05	404
Far East Hotel Mgmt & Consultancy	T-170	13093	21-Mar-05	415.68
Far East Hotel Mgmt & Consultancy	T-170	13093	21-Mar-05	1,483.36
Far East Hotel Mgmt & Consultancy	T-171	13095	21-Mar-05	15.45
Far East Hotel Mgmt & Consultancy	T-172	13096	21-Mar-05	2,803.54
Far East Hotel Mgmt & Consultancy	T-173	13097	21-Mar-05	1,075.64
Far East Hotel Mgmt & Consultancy	T-173	13097	21-Mar-05	19.82
Far East Hotel Mgmt & Consultancy	T-173	13097	21-Mar-05	851.64
Far East Hotel Mgmt & Consultancy	T-173	13097	21-Mar-05	2,417.09
Far East Hotel Mgmt & Consultancy	T-174	13098	21-Mar-05	4,321.68
FFG Ventures	T-194	19174	9-Mar-05	1,626.55
Golden Age Landholdings Inc.	T-228	2771	26-Jan-05	14,952.38
Mc Colbys Inc	T-283	1688	4-Feb-05	363.64
Mc Colbys Inc	T-284	34217	29-Mar-05	359.09
Newport Learning Center Inc.	T-303	534	28-Feb-05	4,545.45
Ocean Link Container Terminals Center	T-314	150124	22-Mar-05	1,715.46
Ocean Link Container Terminals Center	T-314	150124	22-Mar-05	885.96
Ocean Perch Multibless Enterprises	T-315	2520	30-Mar-05	3,454.55
Ocean Perch Multibless Enterprises	T-316	2521	30-Mar-05	1,723.64
Peoples Air Cargo	T-328	591005	21-Jan-05	84.15
Peoples Air Cargo	T-329	618052	7-Mar-05	160.06

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Peoples Air Cargo	T-330	620363	10-Mar-05	26.02
Peoples Air Cargo	T-331	620859	10-Mar-05	36.77
Peoples Air Cargo	T-335	585132	12-Jan-05	133.06
Peoples Air Cargo	T-336	592068	21-Jan-05	86.06
Peoples Air Cargo	T-337	602454	9-Feb-05	47.30
Peoples Air Cargo	T-338	620812	10-Mar-05	38.75
Peoples Air Cargo	T-339	624030	16-Mar-05	303.04
Philgerma Manufacturing Inc	T-350	3954	30-Mar-05	863.63
PLDT	T-352	6459	31-Mar-05	7,329.10
Philippine Port Authority	T-364	18691256	14-Feb-05	51.94
RS Enterprises & Mill Supply	T-396	526	18-Mar-05	938.18
Villa Jireh resort/Hotel	T-486	2644	30-Mar-05	608.43
Villa Jireh resort/Hotel	T-487	226	30-Mar-05	187.77
Toyota Dagupan City Inc.	T-496	60696	15-Mar-05	36.90
TOTAL				140,767.08

Input VAT on purchases of goods

Supplier's Name	Exh No.	Invoice No.	Invoice Date	Input tax
Abstract Industrial Sales	T-497	1739	10-Mar-05	1,320.00
Access Frontier Technologies Inc	T-511	3399	1-Mar-05	615.98
Ace Diesel Parts Supply	T-514	5849	17-Mar-05	265.00
Ace Diesel Parts Supply	T-515	5850	17-Mar-05	190.00
Ace Diesel Parts Supply	T-516	5851	18-Mar-05	16,800.00
Ace Diesel Parts Supply	T-517	5861	31-Mar-05	900.00
Achiever's Sales Corp	T-527	181544	21-Mar-05	1,454.55
Amzen Industires Inc	T-537	2045	29-Mar-05	1,302.00
Andison Industrial Sales Inc	T-541	9901	16-Mar-05	504.55
Armidale Chemical Industrial Corp	T-542	8111	9-Mar-05	27,090.91
Armidale Chemical Industrial Corp	T-543	8131	31-Mar-05	27,090.91
Assisitco Energy and Industrial Corp	T-551	20153	27-Jan-05	3,050.00
Atom Merchandising	T-552	7486	7-Jan-05	3,999.68
Atom Merchandising	T-553	7489	7-Jan-05	1,990.97
Atom Merchandising	T-554	7527	17-Jan-05	36.36
Atom Merchandising	T-555	7528	17-Jan-05	36.00
Atom Merchandising	T-556	7529	17-Jan-05	327.27
Atom Merchandising	T-557	7537	19-Jan-05	681.82
Atom Merchandising	T-558	7544	20-Jan-05	256.20
Atom Merchandising	T-559	7574	28-Jan-05	509.50
Atom Merchandising	T-560	7575	28-Jan-05	665.00
Atom Merchandising	T-561	7576	28-Jan-05	890.00
Atom Merchandising	T-562	7577	28-Jan-05	1,668.68
Atom Merchandising	T-563	7582	28-Jan-05	1,907.29
Atom Merchandising	T-564	7601	1-Feb-05	298.00
Atom Merchandising	T-565	7603	1-Feb-05	926.91
Atom Merchandising	T-566	7604	1-Feb-05	700.00

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Atom Merchandising	T-567	7616	3-Feb-05	950.00
Atom Merchandising	T-568	7617	3-Feb-05	81.82
Atom Merchandising	T-569	7620	7-Feb-05	228.00
Atom Merchandising	T-570	7621	7-Feb-05	115.91
Atom Merchandising	T-571	7622	7-Feb-05	130.00
Atom Merchandising	T-572	7623	7-Feb-05	2,308.50
Atom Merchandising	T-573	7644	10-Feb-05	170.00
Atom Merchandising	T-574	7646	10-Feb-05	229.64
Atom Merchandising	T-575	7659	15-Feb-05	52.36
Atom Merchandising	T-576	7660	15-Feb-05	28.36
Atom Merchandising	T-577	7662	15-Feb-05	126.00
Atom Merchandising	T-578	7663	15-Feb-05	1,500.00
Atom Merchandising	T-579	7664	15-Feb-05	76.36
Atom Merchandising	T-580	7665	15-Feb-05	38.18
Atom Merchandising	T-581	7666	15-Feb-05	3,600.00
Atom Merchandising	T-582	7667	15-Feb-05	3,560.00
Atom Merchandising	T-583	7668	15-Feb-05	189.09
Atom Merchandising	T-584	7669	15-Feb-05	340.00
Atom Merchandising	T-585	7686	18-Feb-05	1,389.68
Atom Merchandising	T-586	7687	18-Feb-05	50.00
Atom Merchandising	T-587	7688	18-Feb-05	172.80
Atom Merchandising	T-588	7751	3-Mar-05	1,237.68
Atom Merchandising	T-589	7752	3-Mar-05	691.20
Atom Merchandising	T-590	7753	3-Mar-05	818.18
Atom Merchandising	T-591	7814	18-Mar-05	637.09
Atom Merchandising	T-592	7815	18-Mar-05	230.00
Atom Merchandising	T-593	7816	18-Mar-05	2,293.18
Atom Merchandising	T-594	7830	23-Mar-05	1,120.00
Atom Merchandising	T-595	7831	23-Mar-05	516.00
Atom Merchandising	T-596	7833	23-Mar-05	1,003.64
Atom Merchandising	T-597	7834	23-Mar-05	883.64
Atom Merchandising	T-598	7836	23-Mar-05	1,263.45
Atom Merchandising	T-599	7837	23-Mar-05	3,612.48
Atom Merchandising	T-600	7851	30-Mar-05	6,042.40
Atom Merchandising	T-601	7857	31-Mar-05	552.00
Atom Merchandising	T-619	149743	3-Feb-05	619.27
Bearing Center & Machinery Inc.	T-623	42363	10-Mar-05	74.00
Bearing Center & Machinery Inc.	T-624	42364	10-Mar-05	230.85
Bearing Center & Machinery Inc.	T-625	42739	22-Mar-05	156.80
Bearing Center & Machinery Inc.	T-626	42740	22-Mar-05	697.70
Bearing Center & Machinery Inc.	T-627	42741	22-Mar-05	1,868.93
Bearing Center & Machinery Inc.	T-628	42742	22-Mar-05	948.07
Bearing Center & Machinery Inc.	T-629	42743	22-Mar-05	6,737.32
Belman Laboratories	T-641	329211	10-Mar-05	113,545.45
Bend's Marketing	T-647	252	17-Mar-05	5,909.09
BHF Corporation	T-648	59462	10-Mar-05	1,954.55
Bitstop Inc.	T-649	20441	24-Feb-05	890.91
Bitstop Inc.	T-650	20670	10-Mar-05	2,181.82
Bitstop Inc.	T-651	20755	10-Mar-05	73.64
Brownstone Asia Tech Inc	T-657	2067	9-Feb-05	7,669.55

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Burgmann Philippines inc	T-658	6482	28-Jan-05	101,400.00
Carried Lumber Company Inc	T-666	13366	18-Feb-05	572.73
Carried Lumber Company Inc	T-667	13366	18-Feb-05	1,827.91
Carried Lumber Company Inc	T-668	13367	18-Feb-05	1,795.45
Carried Lumber Company Inc	T-669	13380	24-Feb-05	272.73
Carried Lumber Company Inc	T-670	13381	24-Feb-05	294.55
Carried Lumber Company Inc	T-671	13399	1-Mar-05	136.36
Carried Lumber Company Inc	T-672	13409	4-Mar-05	1,206.82
Carried Lumber Company Inc	T-673	13410	4-Mar-05	2,974.09
Carried Lumber Company Inc	T-674	13420	7-Mar-05	395.35
Carried Lumber Company Inc	T-675	13431	9-Mar-05	1,879.55
Carried Lumber Company Inc	T-676	13432	10-Mar-05	2,694.55
Carried Lumber Company Inc	T-677	13433	15-Mar-05	2,154.55
Carried Lumber Company Inc	T-678	13453	15-Mar-05	440.91
Carried Lumber Company Inc	T-679	13455	15-Mar-05	422.73
Carried Lumber Company Inc	T-680	13456	15-Mar-05	422.73
Carried Lumber Company Inc	T-681	13457	15-Mar-05	422.73
Carried Lumber Company Inc	T-682	13458	15-Mar-05	404.55
Carried Lumber Company Inc	T-683	13459	15-Mar-05	202.27
Carried Lumber Company Inc	T-684	13460	15-Mar-05	422.73
Carried Lumber Company Inc	T-685	13461	15-Mar-05	422.73
Carried Lumber Company Inc	T-686	13462	15-Mar-05	422.73
Carried Lumber Company Inc	T-687	13463	15-Mar-05	422.73
Carried Lumber Company Inc	T-688	13464	15-Mar-05	422.73
Carried Lumber Company Inc	T-689	13465	15-Mar-05	404.55
Carried Lumber Company Inc	T-690	13466	15-Mar-05	404.55
Carried Lumber Company Inc	T-691	13467	15-Mar-05	202.27
Carried Lumber Company Inc	T-692	13468	15-Mar-05	10,181.82
Carried Lumber Company Inc	T-693	13472	16-Mar-05	6,000.00
Carried Lumber Company Inc	T-694	13473	16-Mar-05	4,745.45
Carried Lumber Company Inc	T-695	13477	16-Mar-05	1,962.73
Carried Lumber Company Inc	T-696	13478	17-Mar-05	4,500.00
Carried Lumber Company Inc	T-697	13479	16-Mar-05	237.27
Carried Lumber Company Inc	T-698	13480	16-Mar-05	409.09
Carried Lumber Company Inc	T-699	13491	18-Mar-05	229.09
Carried Lumber Company Inc	T-700	13492	18-Mar-05	4,636.36
Carried Lumber Company Inc	T-701	13493	18-Mar-05	718.18
Carried Lumber Company Inc	T-702	13496	19-Mar-05	227.27
Carried Lumber Company Inc	T-703	13499	21-Mar-05	18,416.36
Casipit Trading & Constrction Corp.	T-740	1294	16-Feb-05	98.18
Casipit Trading & Constrction Corp.	T-741	1295	8-Mar-05	181.82
Casipit Trading & Constrction Corp.	T-742	1296	8-Mar-05	1,227.27
Cathay Industrial & Mill Supply	T-745	63727	28-Feb-05	45,368.00
Cathay Industrial & Mill Supply	T-746	63981	22-Mar-05	81,000.00
Cathay Industrial & Mill Supply	T-747	63982	22-Mar-05	6,930.00
Cathay Industrial & Mill Supply	T-748	63985	22-Mar-05	45,368.00
Cathay Industrial & Mill Supply	T-749	63986	22-Mar-05	10,500.00
Cathay Industrial & Mill Supply	T-750	63987	22-Mar-05	45,368.00
Cathay Industrial & Mill Supply	T-751	63988	22-Mar-05	45,368.00
Cathay Industrial & Mill Supply	T-752	64006	28-Mar-05	69.00

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Cathay Industrial & Mill Supply	T-753	64053	31-Mar-05	787.50
Chem Alloy Resources Inc	T-796	2808	16-Mar-05	4,375.38
Chem Alloy Resources Inc	T-797	2809	16-Mar-05	4,375.38
Chem Alloy Resources Inc	T-798	2835	17-Mar-05	2,179.60
Chem Alloy Resources Inc	T-799	2836	17-Mar-05	199.60
Civic Merchandising Inc	T-802	34961	23-Mar-05	360.00
Civic Merchandising Inc	T-808	34825	8-Mar-05	6,240.00
Civic Merchandising Inc	T-809	34842	10-Mar-05	89,188.70
Civic Merchandising Inc	T-810	34997	31-Mar-05	32,730.27
Civic Merchandising Inc	T-811	34998	31-Mar-05	15,170.73
Civic Merchandising Inc	T-812	35000	31-Mar-05	42,470.00
Columbia Technologies Inc	T-820	36624	3-Mar-05	45,700.00
Columbia Technologies Inc	T-821	36602	21-Mar-05	11,850.00
Columbia Technologies Inc	T-822	36603	28-Mar-05	11,850.00
Columbia Technologies Inc	T-823	36627	29-Mar-05	11,022.73
Computrends Systems technology Inc.	T-830	15712	14-Mar-05	2,309.50
Computrends Systems technology Inc.	T-831	15726	17-Mar-05	276.00
Computrends Systems technology Inc.	T-832	15683	3-Mar-05	1,290.00
Computrends Systems technology Inc.	T-833	15734	21-Mar-05	25,140.00
Consolidated Industrial Gases Inc.	T-839	11224	8-Jan-05	1,079.82
Consolidated Industrial Gases Inc.	T-840	11282	19-Jan-05	1,216.36
Consolidated Industrial Gases Inc.	T-841	11293	25-Jan-05	735.45
Consolidated Industrial Gases Inc.	T-842	11311	25-Jan-05	1,216.36
Consolidated Industrial Gases Inc.	T-843	11262	15-Jan-05	1,254.36
Consolidated Industrial Gases Inc.	T-844	11263	15-Jan-05	236.36
Consolidated Industrial Gases Inc.	T-845	11527	7-Mar-05	1,665.45
Consolidated Industrial Gases Inc.	T-846	11528	7-Mar-05	934.55
Consolidated Industrial Gases Inc.	T-847	11427	15-Feb-05	1,248.18
Consolidated Industrial Gases Inc.	T-848	11428	15-Feb-05	1,106.36
Consolidated Industrial Gases Inc.	T-849	11445	17-Feb-05	375.45
Consolidated Industrial Gases Inc.	T-850	11570	15-Mar-05	972.73
Consolidated Industrial Gases Inc.	T-851	11600	21-Mar-05	1,804.00
Consolidated Industrial Gases Inc.	T-860	11371	3-Feb-05	5,413.64
Core Automotive Resources Inc.	T-861	10283	31-Mar-05	78,636.37
Core Automotive Resources Inc.	T-861	10283	31-Mar-05	-6,454.55
Core Automotive Resources Inc.	T-862	10287	31-Mar-05	78,636.36
Core Automotive Resources Inc.	T-863	10287	31-Mar-05	-6,454.55
Core Automotive Resources Inc.	T-864	10288	31-Mar-05	78,636.36
Core Automotive Resources Inc.	T-865	10288	31-Mar-05	-6,454.55
CSi Supermarket Inc	T-868	72297	4-Mar-05	43.55
CSI Warehouse Club Inc	T-869	273645	3-Feb-05	631.56
CSI Warehouse Club Inc	T-870	294087	6-Mar-05	188.77
Cysco Green Inc.	T-874	10149	18-Mar-05	2,370.91
Datuin Machine Works	T-876	8760	21-Feb-05	454.55
Delta Hardware Inc	T-877	55078	9-Mar-05	1,650.00
Delta Hardware Inc	T-878	55097	16-Mar-05	2,650.00
Delta Hardware Inc	T-884	55098	16-Mar-05	82.00
Delta Hardware Inc	T-885	55127	29-Mar-05	3,840.00
Digital Micro International Corp	T-894	1646	14-Mar-05	5,500.00
Dotcom, Inc	T-898	2331	12-Jan-05	325.45

Dotcom, Inc	T-899	2332	12-Jan-05	650.91
Eaglestar Industrial Sales Corp	T-901	31052	14-Mar-05	680.00
Eaglestar Industrial Sales Corp	T-902	31056	17-Mar-05	600.00
Edsar Corporation	T-916	2248	17-Mar-05	681.82
Edsar Corporation	T-917	2249	17-Mar-05	8,636.36
Escarda's trading	T-923	1393	28-Mar-05	1,590.91
Eurotech Resources Corporation	T-927	4884	15-Mar-05	197.50
Famous Electrical and Constrction Supply	T-932	108555	23-Mar-05	2,050.00
Famous Electrical and Constrction Supply	T-933	108557	23-Mar-05	2,452.00
Famous Electrical and Constrction Supply	T-934	108559	23-Mar-05	490.00
Famous Electrical and Constrction Supply	T-935	108561	23-Mar-05	200.00
Famous Electrical and Constrction Supply	T-936	108563	23-Mar-05	1,610.00
Famous Electrical and Constrction Supply	T-937	108565	23-Mar-05	455.40
Famous Electrical and Constrction Supply	T-938	108567	23-Mar-05	1,763.00
Famous Electrical and Constrction Supply	T-939	108569	23-Mar-05	711.40
Famous Electrical and Constrction Supply	T-940	108571	23-Mar-05	400.00
Famous Electrical and Constrction Supply	T-941	108573	23-Mar-05	742.80
Famous Electrical and Constrction Supply	T-942	108575	23-Mar-05	238.00
Famous Electrical and Constrction Supply	T-943	108577	23-Mar-05	759.00
Famous Electrical and Constrction Supply	T-944	108579	23-Mar-05	19,605.00
Famous Electrical and Constrction Supply	T-945	108581	28-Mar-05	815.00
Famous Electrical and Constrction Supply	T-945	108583	28-Mar-05	28,710.00
Famous Electrical and Constrction Supply	T-946	108585	28-Mar-05	12,275.00
Famous Electrical and Constrction Supply	T-947	108587	29-Mar-05	440.00
Famous Electrical and Constrction Supply	T-948	108587	30-Mar-05	2,680.50
Far East Hotel Mgmt & Consultancy Inc.	T-1036	5675	7-Feb-05	2,884.10
Far East Hotel Mgmt & Consultancy Inc.	T-1037	5676	7-Feb-05	1,527.27
Far East Hotel Mgmt & Consultancy Inc.	T-1038	5776	31-Mar-05	152.73
Far East Hotel Mgmt & Consultancy Inc.	T-1039	5788	31-Mar-05	1,527.27
Far East Hotel Mgmt & Consultancy Inc.	T-1040	5756	12-Mar-05	1,527.27
Far East Hotel Mgmt & Consultancy Inc.	T-1041	5759	1-Feb-05	1,384.09
Far East Hotel Mgmt & Consultancy Inc.	T-1042	5760	2-Mar-05	458.18
Far East Hotel Mgmt & Consultancy Inc.	T-1043	5763	12-Mar-05	1,094.09
Far East Hotel Mgmt & Consultancy Inc.	T-1044	5823	31-Mar-05	131.45
FH Commercial Inc	T-1055	20372	24-Jan-05	7,272.73
FH Commercial Inc	T-1056	20442	8-Feb-05	3,860.50
FH Commercial Inc	T-1057	20523	21-Feb-05	464.00
FH Commercial Inc	T-1058	20524	21-Feb-05	2,413.90
FH Commercial Inc	T-1059	20530	21-Feb-05	1,020.00
FH Commercial Inc	T-1063	20474	15-Feb-05	372.80
FH Commercial Inc	T-1064	20604	9-Mar-05	3,600.00
FH Commercial Inc	T-1065	20605	15-Mar-05	10,181.82
Filemix Systems & Services Inc	T-1067	667	8-Mar-05	3,732.20
Forza Kemika Ag. Inc	T-1069	10750	16-Mar-05	262.50
General Instrument Corporation	T-1072	40	30-Mar-05	4,090.91
Gilbilt Industrial Marketing	T-1074	9970	4-Mar-05	249.75
GLJ Safety and Industrial Sales Inc.	T-1076	789	1-Mar-05	138.00
GLJ Safety and Industrial Sales Inc.	T-1077	790	19-Feb-05	150.55
GLJ Safety and Industrial Sales Inc.	T-1077	790	19-Feb-05	602.18
GLJ Safety and Industrial Sales Inc.	T-1078	791	19-Feb-05	917.73

GLJ Safety and Industrial Sales Inc.	T-1079	793	19-Feb-05	168.75
GLJ Safety and Industrial Sales Inc.	T-1080	793	19-Feb-05	1,434.65
GLJ Safety and Industrial Sales Inc.	T-1081	803	2-Mar-05	201.82
GLJ Safety and Industrial Sales Inc.	T-1082	810	10-Mar-05	121.82
GLJ Safety and Industrial Sales Inc.	T-1083	811	10-Mar-05	752.73
GLJ Safety and Industrial Sales Inc.	T-1084	815	16-Mar-05	127.27
GLJ Safety and Industrial Sales Inc.	T-1085	819	16-Mar-05	577.82
GLJ Safety and Industrial Sales Inc.	T-1086	823	30-Mar-05	396.36
GLJ Safety and Industrial Sales Inc.	T-1089	824	30-Mar-05	13.64
GLJ Safety and Industrial Sales Inc.	T-1090	825	30-Mar-05	627.27
GNS Tire & Service Center Inc.	T-1104	3139	23-Feb-05	2,159.09
GNS Tire & Service Center Inc.	T-1105	3140	23-Feb-05	30.91
GNS Tire & Service Center Inc.	T-1106	3141	23-Feb-05	2,354.55
GNS Tire & Service Center Inc.	T-1107	3323	2-Mar-05	2,618.18
GNS Tire & Service Center Inc.	T-1108	3350	10-Mar-05	472.73
GNS Tire & Service Center Inc.	T-1109	3005	5-Jan-05	2,472.73
GNS Tire & Service Center Inc.	T-1110	3383	15-Mar-05	1,197.27
GNS Tire & Service Center Inc.	T-1111	3464	15-Mar-05	396.36
GNS Tire & Service Center Inc.	T-1112	3470	29-Mar-05	472.73
GNS Tire & Service Center Inc.	T-1115	3471	29-Mar-05	1,827.73
Gomar Industrial Sales	T-1129	203	14-Mar-05	9,178.72
Gryke Scientific Instruments trading	T-1132	401	31-Mar-05	1,686.00
Gryke Scientific Instruments trading	T-1133	403	31-Mar-05	1,188.00
Hydrauking Industrial Corp	T-1141	2346	16-Mar-05	463.91
Infinity Industrial Sales Corp	T-1144	88929	31-Jan-05	5,532.00
Infinity Industrial Sales Corp	T-1145	89994	9-Mar-05	17,361.92
Infinity Industrial Sales Corp	T-1146	90501	11-Mar-05	9,237.20
Infinity Industrial Sales Corp	T-1147	90616	15-Mar-05	148.20
Infinity Industrial Sales Corp	T-1148	90680	16-Mar-05	7,482.50
Infinity Industrial Sales Corp	T-1149	90697	17-Mar-05	6,922.00
Infinity Industrial Sales Corp	T-1150	90829	19-Mar-05	9,794.48
Infinity Industrial Sales Corp	T-1151	91109	29-Mar-05	37,000.00
Infinity Industrial Sales Corp	T-1152	91110	29-Mar-05	10,976.00
Infinity Industrial Sales Corp	T-1153	91116	30-Mar-05	12,609.60
JRB Paint Center/Ref Aircon & Elec Supply	T-1176	32947	12-Mar-05	8,570.73
JRB Paint Center/Ref Aircon & Elec Supply	T-1177	32948	12-Mar-05	3,248.81
JRB Paint Center/Ref Aircon & Elec Supply	T-1178	32950	12-Mar-05	679.55
JRB Paint Center/Ref Aircon & Elec Supply	T-1185	32944	5-Mar-05	5,468.18
JRB Paint Center/Ref Aircon & Elec Supply	T-1189	32941	24-Feb-05	616.82
JRB Paint Center/Ref Aircon & Elec Supply	T-1190	34501	12-Mar-05	490.91
JRB Paint Center/Ref Aircon & Elec Supply	T-1191	34505	18-Mar-05	514.91
JRB Paint Center/Ref Aircon & Elec Supply	T-1192	34509	22-Mar-05	3,836.91
John Dave Construction & Supply & Gen mdse	T-1198	111	8-Jan-05	3,127.27
John Dave Construction & Supply & Gen mdse	T-1199	114	10-Jan-05	403.64
John Dave Construction & Supply & Gen mdse	T-1200	157	14-Mar-05	954.55
John Dave Construction & Supply & Gen mdse	T-1201	115	2-Feb-05	527.27
John Dave Construction & Supply & Gen mdse	T-1202	159	31-Mar-05	2,269.09
John Dave Construction & Supply & Gen mdse	T-1203	160	31-Mar-05	14,545.45
Juneau Industrial Corp	T-1215	71607	18-Mar-05	538.01
Juneau Industrial Corp	T-1216	71723	30-Mar-05	1,789.85

Junna Industrial Corp	T-1217	57978	15-Feb-05	3,604.30
Junna Industrial Corp	T-1218	57992	21-Feb-05	1,470.00
Junna Industrial Corp	T-1219	58027	28-Feb-05	575.00
Junna Industrial Corp	T-1220	58049	7-Mar-05	23,957.40
Junna Industrial Corp	T-1221	58076	11-Mar-05	688.50
Junna Industrial Corp	T-1222	58081	12-Mar-05	8,541.00
Junna Industrial Corp	T-1223	58138	30-Mar-05	295.20
Keana Printing Services	T-1233	1081	7-Mar-05	202.73
King's Engineering Sales	T-1238	2916	4-Mar-05	19,073.51
KLG International Inc	T-1242	10320	14-Mar-05	216.00
K-Lite Systems innovations Inc	T-1243	794	22-Mar-05	1,162.00
K-Lite Systems innovations Inc	T-1244	795	22-Mar-05	1,746.00
K-Lite Systems innovations Inc	T-1245	796	22-Mar-05	1,800.00
Komstak Incorporated	T-1247	28645	21-Mar-05	89.00
Komstak Incorporated	T-1248	28681	30-Mar-05	1,270.78
Le Price International Corp	T-1253	4985	18-Mar-05	25,207.90
Mabuhay vinyl Corp	T-1277	216177	30-Nov-04	13,883.37
Machinery Reliability Systems Inc.	T-1279	58	4-Mar-05	3,773.52
Machinery Reliability Systems Inc.	T-1280	58	4-Mar-05	3,041.28
Machinery Reliability Systems Inc.	T-1281	60	4-Mar-05	628.92
Machinery Reliability Systems Inc.	T-1282	61	4-Mar-05	628.92
Magiclub Inc.	T-1287	2958	4-Mar-05	67.26
Mhe-demag (P) Inc	T-1292	13158	18-Mar-05	2,914.90
Monark Equipment Corporation	T-1293	ps180000666	28-Feb-05	3,780.55
Monark Equipment Corporation	T-1294	ps1800006678	7-Mar-05	1,262.73
Monark Equipment Corporation	T-1294	ps180000690	16-Mar-05	307.18
Monark Equipment Corporation	T-1295	ps180000691	16-Mar-05	1,347.82
Monark Equipment Corporation	T-1298	ps180000697	18-Mar-05	567.64
Monark Equipment Corporation	T-1299	ps180000698	18-Mar-05	408.36
Monark Equipment Corporation	T-1300	ps180000700	22-Mar-05	810.36
Monark Equipment Corporation	T-1301	ps180000715	30-Mar-05	11,230.82
Monark Equipment Corporation	T-1302	ps180000716	30-Mar-05	915.27
Motorplaza Inc	T-1312	40543	11-Mar-05	225.45
Motorplaza Inc	T-1313	40544	11-Mar-05	146.36
Motorplaza Inc	T-1314	40545	11-Mar-05	751.36
Motorplaza Inc	T-1315	40330	11-Feb-05	270.00
Motorplaza Inc	T-1316	40331	11-Feb-05	270.00
Motorplaza Inc	T-1317	40178	27-Jan-05	183.64
Motorplaza Inc	T-1318	40179	27-Jan-05	968.18
Motorplaza Inc	T-1319	40182	27-Jan-05	80.45
Motorplaza Inc	T-1320	40183	27-Jan-05	1,875.45
Motorplaza Inc	T-1321	40205	28-Jan-05	751.36
Motorplaza Inc	T-1322	40655	28-Mar-05	120.45
Motorplaza Inc	T-1323	41107	28-Mar-05	504.54
Motorplaza Inc	T-1325	139457	21-Mar-05	636.82
Motorplaza Inc	T-1326	41101	28-Mar-05	118.18
Motorplaza Inc	T-1327	41102	28-Mar-05	2,690.91
Motorplaza Inc	T-1330	41108	28-Mar-05	305.45
Multisystem Industrial Sales & Services Inc	T-1331	8955	2-Mar-05	2,867.94
Multisystem Industrial Sales & Services Inc	T-1332	8979	14-Mar-05	116.50

Newburg Commercial Inc	T-1341	42080	21-Mar-05	445.50
Newburg Commercial Inc	T-1342	42081	21-Mar-05	1,394.85
Newburg Commercial Inc	T-1343	42075	4-Mar-05	44.60
Newburg Commercial Inc	T-1344	42076	14-Mar-05	795.75
Newburg Commercial Inc	T-1345	42077	15-Mar-05	123.57
Newburg Commercial Inc	T-1346	42078	15-Mar-05	150.49
Newburg Commercial Inc	T-1363	42079	15-Mar-05	272.46
Newburg Commercial Inc	T-1364	42082	21-Mar-05	1,861.37
Newburg Commercial Inc	T-1365	42120	23-Mar-05	504.12
Newburg Commercial Inc	T-1366	42121	23-Mar-05	97.36
Newburg Commercial Inc	T-1367	42122	23-Mar-05	2,286.90
Newburg Commercial Inc	T-1368	42123	28-Mar-05	706.30
Newburg Commercial Inc	T-1369	42124	28-Mar-05	184.47
Newburg Commercial Inc	T-1370	42125	28-Mar-05	604.12
Newton Electrical Equipment Company, Inc.	T-1383	4024	31-Mar-05	500.00
Newton Electrical Equipment Company, Inc.	T-1385	4025	31-Mar-05	2,200.00
Newtrends International Corporation	T-1386	11009	18-Feb-05	19,748.18
Norvic Drugs Corporation	T-1395	5310	1-Mar-05	3,767.55
Norvic Drugs Corporation	T-1396	5311	1-Mar-05	2,894.80
Norvic Drugs Corporation	T-1397	5312	1-Mar-05	2,183.57
Norvic Drugs Corporation	T-1398	5313	1-Mar-05	1,372.64
Norvic Drugs Corporation	T-1399	5323	4-Mar-05	1,158.86
Norvic Drugs Corporation	T-1401	4015	5-Jan-05	1,252.14
Norvic Drugs Corporation	T-1402	4016	5-Jan-05	330.91
OSA Industries Phils., Inc.	T-1411	2984	11-Jan-05	4,500.00
OSA Industries Phils., Inc.	T-1412	2979	11-Jan-05	11,700.00
Peridot Parts Sales & Supply	T-1415	2317	7-Mar-05	138.00
PG Scientific & Medical Supply	T-1423	2539	14-Mar-05	209.45
Philgerma Manufacturing Inc.	T-1426	5263	14-Mar-05	1,272.73
Philgerma Manufacturing Inc.	T-1431	5264	16-Mar-05	2,727.27
Philippine Packings & Seals Corporation	T-1434	3055	11-Mar-05	605.00
Pilipinas Shell Petroleum Corp	T-1448	912671307	30-Mar-05	10,298.46
Pilipinas Shell Petroleum Corp	T-1450	912641095	28-Feb-05	1,163.08
Pilipinas Shell Petroleum Corp	T-1451	912641097	28-Feb-05	1,163.08
Pilipinas Shell Petroleum Corp	T-1452	912641100	28-Feb-05	71,201.73
Pilipinas Shell Petroleum Corp	T-1453	912662334	21-Mar-05	6,931.78
Pilipinas Shell Petroleum Corp	T-1454	912671301	30-Mar-05	27,952.97
Pilipinas Shell Petroleum Corp	T-1455	912671303	30-Mar-05	4,413.63
Pilipinas Shell Petroleum Corp	T-1456	912671303A	30-Mar-05	4,838.58
Pilipinas Shell Petroleum Corp	T-1457	912671373	30-Mar-05	84,669.11
Pilipinas Shell Petroleum Corp	T-1458	912671375	30-Mar-05	11,205.28
Pilipinas Shell Petroleum Corp	T-1459	912671376	30-Mar-05	7,356.05
Pillars Rtw & Gen. Mdse.	T-1461	9893	6-Mar-05	68.18
Pinnacle Parts Company Inc.	T-1462	12444	16-Mar-05	1,496.00
Pinnacle Parts Company Inc.	T-1463	12447	16-Mar-05	1,720.00
Pinnacle Parts Company Inc.	T-1464	12463	22-Mar-05	5,950.00
Pinnacle Parts Company Inc.	T-1465	12474	31-Mar-05	3,980.00
Power and Industrial Equipment Sales and Aftermarket Services, Inc.	T-1481	581	14-Feb-05	1,420.00
Rojemson Chemical & Industrial Corporation	T-1509	9534	16-Mar-05	6,796.82

Rojemson Chemical & Industrial Corporation	T-1510	9579	22-Mar-95	6,760.91
Royal Jade Machinery Phils., Corp.	T-1516	12306	21-Mar-05	72,464.17
RS Components Limited (Phils.)	T-1518	22689 RI	7-Feb-05	2,829.43
RS Components Limited (Phils.)	T-1519	22475 RI	31-Jan-05	2,389.63
RS Components Limited (Phils.)	T-1520	23307 RI	22-Feb-05	1,183.89
RS Components Limited (Phils.)	T-1521	23653 RI	2-Mar-05	246.36
RS Components Limited (Phils.)	T-1522	21926 RI	19-Jan-05	291.56
RS Components Limited (Phils.)	T-1523	22296 RI	27-Jan-05	995.94
RS Components Limited (Phils.)	T-1524	22567 RI	3-Feb-05	561.22
RS Components Limited (Phils.)	T-1525	22635 RI	5-Feb-05	280.61
RS Enterprises & Mill Supply	T-1526	1661	26-Feb-05	5,000.00
RS Enterprises & Mill Supply	T-1527	1660	9-Feb-05	872.73
RS Enterprises & Mill Supply	T-1528	1663	15-Mar-05	4,836.00
RS Enterprises & Mill Supply	T-1529	1662	10-Mar-05	581.82
RS Enterprises & Mill Supply	T-1534	1664	29-Mar-05	229.09
S.K. Hardware & Gen. Merchandise	T-1543	12490	18-Feb-05	743.64
S.K. Hardware & Gen. Merchandise	T-1544	12496	23-Feb-05	63.64
S.K. Hardware & Gen. Merchandise	T-1545	12497	23-Feb-05	221.82
S.K. Hardware & Gen. Merchandise	T-1546	12498	23-Feb-05	163.75
S.K. Hardware & Gen. Merchandise	T-1547	12501	23-Feb-05	763.64
S.K. Hardware & Gen. Merchandise	T-1548	12502	23-Feb-05	1,908.93
S.K. Hardware & Gen. Merchandise	T-1549	12506	23-Feb-05	101.82
S.K. Hardware & Gen. Merchandise	T-1550	12507	23-Feb-05	203.64
S.K. Hardware & Gen. Merchandise	T-1551	12508	23-Feb-05	80.91
S.K. Hardware & Gen. Merchandise	T-1552	12509	23-Feb-05	304.36
S.K. Hardware & Gen. Merchandise	T-1553	12510	23-Feb-05	170.00
S.K. Hardware & Gen. Merchandise	T-1554	12526	9-Mar-05	108.64
S.K. Hardware & Gen. Merchandise	T-1555	12545	9-Mar-05	1,795.00
S.K. Hardware & Gen. Merchandise	T-1556	12563	9-Mar-05	59.09
S.K. Hardware & Gen. Merchandise	T-1557	12564	9-Mar-05	65.45
S.K. Hardware & Gen. Merchandise	T-1558	12565	9-Mar-05	54.55
S.K. Hardware & Gen. Merchandise	T-1559	12567	9-Mar-05	2,176.36
S.K. Hardware & Gen. Merchandise	T-1560	12569	9-Mar-05	201.82
S.K. Hardware & Gen. Merchandise	T-1561	12570	9-Mar-05	87.27
S.K. Hardware & Gen. Merchandise	T-1562	12572	9-Mar-05	100.00
S.K. Hardware & Gen. Merchandise	T-1563	12566	9-Mar-05	3,900.00
S.K. Hardware & Gen. Merchandise	T-1564	12568	9-Mar-05	122.73
S.K. Hardware & Gen. Merchandise	T-1565	12571	9-Mar-05	514.55
S.K. Hardware & Gen. Merchandise	T-1566	12573	9-Mar-05	114.91
S.K. Hardware & Gen. Merchandise	T-1569	12618	16-Mar-05	19.09
S.K. Hardware & General Merchandise	T-1593	12406	2-Feb-05	3,456.82
S.K. Hardware & General Merchandise	T-1594	12546	9-Mar-05	163.64
S.K. Hardware & General Merchandise	T-1595	12615	16-Mar-05	12,477.27
Severo Sy Ling, Inc.	T-1606	103423	4-Mar-05	625.60
Simplex Industrial Corporation	T-1612	120452	4-Mar-05	98.64
Simplex Industrial Corporation	T-1613	121277	16-Mar-05	560.00
Simplex Industrial Corporation	T-1614	118921	7-Feb-05	585.45
Simplex Industrial Corporation	T-1615	121276	16-Mar-05	181.82
Simpson's Philippines, Incorporated	T-1616	1270	9-Mar-05	4,520.00
Sky Computer and Office Supplies	T-1617	85757	17-Mar-05	63.64

Sky Computer and Office Supplies	T-1618	85905	21-Mar-05	259.09
Sky Computer and Office Supplies	T-1619	86321	31-Mar-05	238.18
Tadchem Marketing	T-1629	10	18-Mar-05	14,109.40
Taipan Enterprise	T-1635	3142	21-Mar-05	968.55
Taipan Enterprise	T-1636	3143	21-Mar-05	1,057.36
TCY Machinery Works	T-1648	10322	3-Mar-05	1,500.00
Tech-Quipped Controls Trading	T-1653	1415	28-Mar-05	5,000.00
Tech-Quipped Controls Trading	T-1654	1416	28-Mar-05	28,943.68
Tech-Quipped Controls Trading	T-1655	1418	29-Mar-05	9,350.00
Tech-Quipped Controls Trading	T-1656	1419	29-Mar-05	2,100.00
The Mouse House, Inc.	T-1671	1886	29-Jan-05	1,922.73
The Mouse House, Inc.	T-1672	1893	3-Feb-05	254.55
The Mouse House, Inc.	T-1673	1892	3-Feb-05	1,368.18
The Mouse House, Inc.	T-1674	2014	23-Mar-05	668.18
Theo-Pam Trading Corporation	T-1675	138974	28-Mar-05	1,527.27
Theo-Pam Trading Corporation	T-1676	141725	28-Mar-05	240.45
Toyota Dagupan City, Incorporated	T-1684	60696	15-Mar-05	133.21
Toyota Dagupan City, Incorporated	T-1685	60803	28-Mar-05	300.90
Toyota Dagupan City, Incorporated	T-1686	60282	1-Feb-05	440.37
Toyota Dagupan City, Incorporated	T-1687	60496	24-Feb-05	300.94
Toyota Dagupan City, Incorporated	T-1688	60599	4-Mar-05	354.81
Toyota Dagupan City, Incorporated	T-1689	60600	4-Mar-05	524.91
Toyota Dagupan City, Incorporated	T-1690	60601	4-Mar-05	607.80
Toyota Dagupan City, Incorporated	T-1691	60787	28-Mar-05	341.35
Toyota Dagupan City, Incorporated	T-1693	60167	20-Jan-05	2,492.02
Toyota Dagupan City, Incorporated	T-1694	60187	21-Jan-05	233.12
Ultimate Option Gunworks & Accessories	T-1696	1559	12-Feb-05	750.91
Ultrapure Chemrock Corporation	T-1697	2824	22-Mar-05	28,181.82
Unisafe Industrial Company	T-1701	2929	21-Mar-05	2,272.73
Unisafe Industrial Company	T-1702	2822	18-Feb-05	2,272.73
Up-Town Industrial Sales, Inc.	T-1714	31756	4-Mar-05	7,168.40
Up-Town Industrial Sales, Inc.	T-1715	31793	4-Mar-05	282.24
Up-Town Industrial Sales, Inc.	T-1716	32105	10-Mar-05	29,028.80
Up-Town Industrial Sales, Inc.	T-1727	28701	7-Jan-05	288.02
Up-Town Industrial Sales, Inc.	T-1728	28702	7-Jan-05	2,901.54
Up-Town Industrial Sales, Inc.	T-1729	28966	12-Jan-05	21.90
Up-Town Industrial Sales, Inc.	T-1730	30167	1-Feb-05	5,091.50
Up-Town Industrial Sales, Inc.	T-1731	30171	1-Feb-05	5,091.50
Up-Town Industrial Sales, Inc.	T-1732	30386	7-Feb-05	11,926.00
Up-Town Industrial Sales, Inc.	T-1733	31792	4-Mar-05	634.00
Up-Town Industrial Sales, Inc.	T-1734	32329	14-Mar-05	635.00
Up-Town Industrial Sales, Inc.	T-1735	32438	16-Mar-05	12,012.60
Up-Town Industrial Sales, Inc.	T-1736	32588	17-Mar-05	497.10
Up-Town Industrial Sales, Inc.	T-1737	32782	21-Mar-05	2,079.00
Up-Town Industrial Sales, Inc.	T-1738	32869	23-Mar-05	8,361.00
Up-Town Industrial Sales, Inc.	T-1739	32900	23-Mar-05	46,810.00
Up-Town Industrial Sales, Inc.	T-1740	33016	29-Mar-05	237.00
Up-Town Industrial Sales, Inc.	T-1741	33048	30-Mar-05	6,897.60
Up-Town Industrial Sales, Inc.	T-1742	33105	30-Mar-05	5,069.50
Up-Town Industrial Sales, Inc.	T-1743	33206	31-Mar-05	448.26

Valley Technologies, Inc.	T-1754	1148	28-Mar-05	4,136.00
West Point Guns & Sportswear	T-1756	12292	12-Feb-05	138.41
Wise Industrial Systems, Inc.	T-1765	2093	4-Mar-05	2,577.96
WM. H. Rennolds Company, Inc.	T-1768	17421	1-Mar-05	29,577.27
WM. H. Rennolds Company, Inc.	T-1769	17434	5-Mar-05	4,867.57
WM. H. Rennolds Company, Inc.	T-1770	17435	5-Mar-05	4,466.45
WM. H. Rennolds Company, Inc.	T-1771	17507	30-Mar-05	654.55
WM. H. Rennolds Company, Inc.	T-1773	17470	18-Mar-05	649.01
WM. H. Rennolds Company, Inc.	T-1774	17479	12-Mar-05	12,272.73
Worthwater Technology Corporation	T-1776	256	29-Mar-05	4,595.46
Wyler Enterprises, Inc.	T-1778	21365	9-Mar-05	959.55
Wyler Enterprises, Inc.	T-1779	21366	9-Mar-05	2,751.36
Wyler Enterprises, Inc.	T-1780	21414	16-Mar-05	1,254.55
Wyler Enterprises, Inc.	T-1781	21415	16-Mar-05	177.27
Wyler Enterprises, Inc.	T-1784	21309	3-Mar-05	236.36
Wyler Enterprises, Inc.	T-1785	21438	18-Mar-05	400.00
Yana Chemodities, Inc.	T-1789	142391	4-Feb-05	330.00
Yana Chemodities, Inc.	T-1790	144142	18-Mar-05	8,227.27
Yana Chemodities, Inc.	T-1791	144345	29-Mar-05	6,507.00
YRS Motorcycle Modifications, Inc.	T-1797	4244	10-Mar-05	525.37
YRS Motorcycle Modifications, Inc.	T-1799	4242	10-Mar-05	952.82
YRS Motorcycle Modifications, Inc.	T-1800	6210	31-Mar-05	221.82
Zab Enterprises	T-1810	20101	24-Jan-05	77.73
Zab Enterprises	T-1811	20468	15-Feb-05	257.54
Zab Enterprises	T-1812	19913	25-Jan-05	16,656.25
Zab Enterprises	T-1813	20590	22-Feb-05	2,414.54
Zab Enterprises	T-1814	20703	3-Mar-05	1,579.72
Zab Enterprises	T-1815	20834	10-Mar-05	4,909.09
Zab Enterprises	T-1816	20915	19-Mar-05	402.73
Zab Enterprises	T-1817	20923	19-Mar-05	277.73
Zab Enterprises	T-1818	20925	19-Mar-05	1,272.73
Zab Enterprises	T-1819	21036	22-Mar-05	626.00
Zab Enterprises	T-1820	21100	31-Mar-05	363.64
Zab Enterprises	T-1821	21101	31-Mar-05	363.64
Zenith Electrical & Industrial Supply Corporation	T-1846	28230	14-Jan-05	4,647.50
TOTAL				2,605,989.48

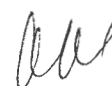
Input VAT on importations

Supplier's Name	Exh No.	Entry Date	OR Date	Input tax
Sulzer Pumps Asia Pacific	T-1897	17-Jan-05	19-Jan-05	40,930.00
Access Frontier tech Ptd Ltd	T-1898	3-Feb-05	3-Feb-05	51,778.00
Emerson Process Mgmt	T-1899	16-Feb-05	9-Mar-05	82,270.00
Wier Valve & Controls	T-1900	4-Mar-05	15-Mar-05	77,759.00
Eletrocatalytic Products Pte Ltd	T-1902	26-Feb-05	2-Mar-05	6,641.00
	T-1903	1-Mar-05	9-Mar-05	9,736.00
SNRI Route Du Treuil	T-1912	10-Mar-05		13,682.00

Quinta Raddison Ltd	T-1915	30-Mar-05	400,458.00
Quinta Raddison Ltd	T-1876	23-Mar-05	26,577.00
Quinta Raddison Ltd	T-1877	28-Mar-05	17,163.00
Agenthur H. Willems	T-1881	10-Feb-05	5,179.00
LBP receipts			
	T-1882	9-Feb-05	11,110.00
	T-1883	8-Feb-05	11,583.00
	T-1884	15-Mar-05	4,055.00
	T-1885	9-Mar-05	20,511.00
	T-1891	28-Mar-05	4,031.00
BOC receipts			
	T-1920	Jan-05	2,625.00
	T-1921	10-Jan-05	2,961.00
	T-1922	14-Mar-05	12,573.00
	T-1923	9-Feb-05	323.00
	T-1924	6-Feb-05	697.00
	T-1925	22-Jan-05	2,494.00
	T-1926	11-Mar-05	5,265.00
	T-1927	18-Feb-05	3,054.00
	T-1928	16-Mar-05	8,609.00
	T-1929	5-Jan-05	2,265.00
	T-1930		3,540.00
	T-1931	10-Mar-05	100.00
	T-1933	21-Mar-05	2,421.00
	T-1934	21-Jan-05	1,880.00
	T-1935	30-Mar-05	60.00
	T-1938	28-Mar-05	2,813.00
TOTAL			835,143.00

Total Deduction for Second Quarter

3,581,899.56



ANNEX "B"

THIRD QUARTER

Input VAT on purchases of services

Supplier's Name	Exh No.	OR No.	OR Date	Input tax
Ocean Perch Multibless Enterprises	U-282	2538	24-Feb-05	3,454.55
Peoples Air Cargo and Warehousing Co. Inc	U-296	614615	1-Mar-05	1,193.45
Philippine Skylanders Inc	U-324	525633	18-Feb-05	31.07
Philippine Skylanders Inc	U-325	530615	10-Mar-05	40.43
Pinnacle Parts Company Inc.	U-334	2704	24-Mar-05	4,660.00
TOTAL				9,379.50

Input VAT on purchases of goods

Supplier's Name	Exh No.	Invoice No.	Invoice Date	Input tax
Anson Emporium	U-529	53663	20-Jan-05	16.37
Anson Emporium	U-529	53663	20-Jan-05	1,645.46
BCM Marketing	U-564	6719	4-Mar-05	218.55
Bitstop Inc.	U-616	3487	1-Feb-05	181.82
Carworld Inc	U-664	84972	2-Jun-04	219.64
Carworld Inc	U-665	87107	6-Dec-04	1,128.20
Carworld Inc	U-666	88319	3-Feb-05	3,157.27
Carworld Inc	U-667	88494	21-Mar-05	242.50
Chemalloy Resources	U-699	2826	17-Mar-05	5,229.78
Chemalloy Resources	U-706	2824	17-Mar-05	3,644.00
Chemalloy Resources	U-707	2825	17-Mar-05	728.80
Dotcom Inc	U-768	2253	21-Jan-05	54.55
Dy auto Supply & Hardware	U-770	99450	14-Jan-05	382.50
Edupro Inc	U-792	6733	28-Mar-05	561.81
Nueva Fortuna Merchandising	U-1215	13438	19-Jan-05	530.65
Nueva Fortuna Merchandising	U-1216	13596	21-Mar-05	50.00
SK Hardware & General merchandise	U-1345	12447	10-Feb-05	115.91
SK Hardware & General merchandise	U-1346	12471	16-Feb-05	306.82
SK Hardware & General merchandise	U-1347	12475	16-Feb-05	568.18
SK Hardware & General merchandise	U-1348	12574	9-Mar-05	160.00
SK Hardware & General merchandise	U-1349	12575	9-Mar-05	358.30
SK Hardware & General merchandise	U-1350	12576	9-Mar-05	378.18
SK Hardware & General merchandise	U-1351	12611	16-Mar-05	212.73
SK Hardware & General merchandise	U-1352	12612	16-Mar-05	15.91
SK Hardware & General merchandise	U-1353	12613	16-Mar-05	381.82
SK Hardware & General merchandise	U-1354	12616	16-Mar-05	1,287.49
SK Hardware & General merchandise	U-1355	12617	16-Mar-05	86.36
SK Hardware & General merchandise	U-1356	12619	16-Mar-05	150.00
SK Hardware & General merchandise	U-1357	12620	16-Mar-05	229.09

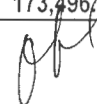
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SK Hardware & General merchandise	U-1358	12621	16-Mar-05	3,113.64
SK Hardware & General merchandise	U-1359	12624	16-Mar-05	133.09
SK Hardware & General merchandise	U-1360	12656	30-Mar-05	352.18
SK Hardware & General merchandise	U-1361	12657	30-Mar-05	118.18
SK Hardware & General merchandise	U-1362	12658	30-Mar-05	540.91
SK Hardware & General merchandise	U-1363	12661	30-Mar-05	317.09
SK Hardware & General merchandise	U-1364	12662	30-Mar-05	19.09
SK Hardware & General merchandise	U-1365	12667	30-Mar-05	350.00
TOTAL				27,186.87

Input VAT on importation of goods

Supplier's Name	Exh No.	Entry No.	Entry Date	OR Date	Input tax
Flower Serve Spain SA	U-1703	58787574	2-Dec-04	3-Mar-05	6,795.00
Bosch rexroth Pte Ltd	U-1695	56762912	23-Nov-04	16-Feb-05	1,738.00
Quinta Raddison Ltd.	U-1722	61241205	22-Mar-05	22-Mar-05	240.00
Wiix & Hoeglund Public Co. Inc.	U-1752	58743526	16-Feb-05	16-Feb-05	93,216.00
Bosch rexroth Pte Ltd	U-1761	61268374	20-Mar-05	21-Mar-05	4,238.00
Quinta Raddison Ltd.	U-1788	61241205	22-Mar-05	21-Mar-05	30,703.00
TOTAL					136,930.00

Total Deduction for Third Quarter	173,496.37
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ANNEX "C"

FOR THE MONTH OF OCTOBER

Input VAT on purchases of services

Supplier's Name	Exh No.	OR No.	OR Date	Input tax
Alexander Forbes Phils Risk Services Inc	V-7	2864	7-Feb-05	189,890.28
Gentech Construction	V-101	30	9-Nov-05	124,282.02
TOTAL				314,172.30

Input VAT on purchases of goods

Supplier's Name	Exh No.	Invoice No.	Invoice Date	Input tax
Consolidated Industrial Gases Inc	V-361	11445	17-Feb-05	227.27
TOTAL				227.27

Input VAT on importations

Supplier's Name	Exh No.	Entry No.	Entry Date	OR Date	Input tax
Emerson Process Management	V-873	60028412	18-Feb-05	18-Feb-05	24,891.00
Mcmaster Carr	V-929			5-Mar-05	3,427.00
TOTAL					28,318.00

Total Deduction for October	342,717.57
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