Republic of the Philippines
COURT OF TAX APPEALS
Quezon City

SECOND DIVISION
* * * * * * * *

DEUTSCHE KNOWLEDGE SERVICES, PTE. LTD.,
Petitioner,

-versus-

COMMISSIONER OF INTERNAL REVENUE,
Respondent.

CTA CASE No. 8443

Members:

CASTAÑEDA, JR., *Chairperson*,
CASANOVA, and
COTANGCO-MANALASTAS, JJ.

Promulgated:
JUL 07 2014
4:30 p.m.

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DECISION

CASTAÑEDA, JR., J.:

This is a Petition for Review filed by Deutsche Knowledge Services, Pte. Ltd. to seek the refund or the issuance of tax credit certificate in the amount of ₱33,868,101.19, representing alleged excess and unutilized input value-added tax (VAT) attributable to its zero-rated sales for the first quarter of calendar year 2010.

THE FACTS

Petitioner Deutsche Knowledge Services Pte. Ltd. is the Philippine branch of a multinational company organized and existing under and by virtue of the laws of Singapore, with registered office address at One Raffles Quay, 17-10 South Tower, Singapore 048583.[1] It was registered with the Bureau of Internal Revenue (BIR) on June 16, 2005 as a VAT-registered taxpayer with Taxpayer Identification No. (TIN) 238-763-115-000.[2] Petitioner is licensed to do business as a regional operating headquarters (ROHQ) in the Philippines to engage in general administration and planning; business planning and coordination; sourcing/procurement of raw materials and components; training and personnel management; logistic services; product

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[1] Par. 1, Admitted Facts, Joint Stipulation of Facts and Issues, docket, p. 73.
[2] Exhibit "B"

development; technical support and maintenance; data processing and communication; and business development.[3]

Respondent is the duly appointed Commissioner of the BIR empowered to perform the duties of her office, including, among others, the duty to act upon and approve claims for refund or tax credit as provided by law. She holds office at the 5th Floor, BIR National Office Building, Agham Road, Diliman, Quezon City.

Petitioner entered into several IntraGroup Service Agreements (Service Agreements) with foreign clients with business addresses located abroad.[4]

On October 21, 2011, petitioner filed its Application for Tax Credits/Refund (BIR Form No. 1914) and letter claim for refund, together with the relevant supporting documents with the BIR Large Taxpayers Regular Audit Division 3.[5] The refund claim purportedly represented the unutilized input VAT attributable to its zero-rated sales of services to its foreign clients during the first quarter of calendar year 2010.

Since respondent failed to resolve petitioner's administrative claim for refund, petitioner filed the instant claim before this Court on March 19, 2012.

In her Answer[6] filed on May 11, 2012, respondent interposed the following Special and Affirmative Defenses:

> "4. Petitioner is not entitled to refund or tax credit in the amount of P33,868,101.19 representing alleged unutilized input tax because it failed to submit necessary and relevant documents pertaining to the above-mentioned amount with respondent in the administrative claim for refund or tax credit of excess input tax.
>
> 5. In an administrative claim for refund or tax credit of input taxes attributable to zero-rated sales, a VAT registered person must submit complete documents to support its application for refund pursuant to Section 112 (D) of the National Internal Revenue Code (NIRC) of 1997. Otherwise, there will be no sufficient compliance with the filing of an administrative claim for refund, which is a condition sine qua non prior to the filing of judicial claim.
>
> 6. To support its claim, it is imperative for petitioner to prove and present the following, viz:

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[3] Exhibit "A"
[4] Exhibits "K-1" to "K-22"
[5] Exhibits "G" and "H"
[6] Docket, pp. 40-46.

a. The registration requirements of a value-added taxpayer in compliance with Section 6(a) and (b) of Revenue Regulations No. 6-97 in relation to Section 4.107-a (a) of Revenue Regulations No. 7-95, and Section 236 of the NIRC of 1997;

b. The invoicing and accounting requirements for VAT-registered persons, as well as the filing and payment of VAT in compliance with the provisions of Sections 113 and 114 of the NIRC of 1997;

c. Proof of compliance with the prescribed checklist of requirements to be submitted involving claim for VAT refund pursuant to Revenue Memorandum Order No. 53-98. It is worthy of emphasis that Section 112 (D) of the NIRC of 1997 requires the submission of complete documents in support of the application filed with the Bureau of Internal Revenue before the 120-day audit period shall apply, and before the taxpayer could avail of judicial remedies as provided for in the law. Hence, petitioner's failure to submit proof of compliance with the above-stated requirements warrants immediate dismissal of the petition for review.

d. That the input taxes of P33,868,101.19 allegedly paid by petition on its domestic purchases of non-capital goods and services, services rendered by non-residents and importation of non-capital goods for the 4th quarter of taxable year 2009 were attributable to its zero-rated sales and such have not been applied against any output tax and were carried over in the succeeding taxable quarter or quarters;

e. That petitioner's administrative claim for tax credit or refund of the unutilized input tax (VAT) was filed within two (2) year after the close of the taxable quarter when the sales were made in accordance with Sections 112 (A) and (D) of the NIRC of 1997;

f. That petitioner's domestic purchases of goods and services were made in the course of its trade or business, properly supported by VAT invoices and/or official receipts and other documents, such as subsidiary purchase journal, showing that it actually paid VAT in accordance with Sections 110 (A) (2) and 113 of the NIRC of 1997, and in pursuance to Section 4.104-5 (a) and (b) of Revenue Regulations No. 7-95 (RE: Substantiation of Claims for Input Tax Credit);

g. The requirements as enumerated under Section 4.104-2 of Revenue Regulations 7-95 (Re: Persons who can avail of the Input Tax Credits).

7. Petitioner's alleged claim for refund is subject to administrative routinary investigation/examination by the Bureau of Internal Revenue (BIR).

8. Petitioner likewise did not submit any proof that it rendered services to persons engaged in business conducted outside the Philippines, the payments of which were made in Euro and other acceptable foreign currency in accordance with the rules and regulations of the Bangko Sentral ng Pilipinas.

9. Section 108 (B) (2) of the NIRC of 1997 states that:

> '**SEC. 108. *Value-added Tax on Sale of Services and Use or Lease of Properties.* –**
>
> x x x
>
> ***(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.
>
> x x x
>
> 2) Services other than those mentioned in the preceding paragraph, the consideration for which is paid for in acceptable foreign currency and accounted for in accordance with the rules and regulations of the Bangko Sentral ng Pilipinas (BSP);'

As shown by the above provision, the taxpayer must comply with the following requirements: 1) the recipient is doing business outside the Philippines, 2) the payment of the service fees was in acceptable foreign currency, and 3) accounting of such remittance was in accordance with BSP rules.

10. In the case of Commissioner of Internal Revenue vs. Burmeister & Wain Scandinavian Contractor Mindanao, Inc., GR No. 153205, January 22, 2007, the Supreme Court stated:

> The Tax code not only requires that the services be other than 'processing, manufacturing or repacking of goods' and that payment for such services be in

> acceptable foreign currency accounted for in accordance with BSP rules. Another essential condition for qualification to zero-rating under Section 102 (b) (2) is the **recipient of such services is doing business *outside* the Philippines.** While this requirement is not expressly stated in the second paragraph of Section 102 (b) this is clearly provided in the first paragraph of Section 102 (b) where the listed services must be **'for other persons doing business outside the Philippines.'** The phrase 'for other persons doing business outside the Philippines 'not only refers to the services enumerated in the first paragraph of Section 102 (b), but also pertains to the general term 'services: appearing in the second paragraph of Section 102 (b). In short, services other than processing, manufacturing, or repacking of goods must likewise be performed for persons doing business outside the Philippines.
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> This can only be the logical interpretation of Section (b) (2). If the provider and recipient of the 'other services' are both doing business in the Philippines, the payment of foreign currency is irrelevant. Otherwise, those subject to the regular VAT under Section 102 (a) can avoid paying the VAT by simply stipulating payment in foreign currency inwardly remitted by the recipient of services. To interpret Section 102 (b) (2) to apply a payer-recipient of services doing business in the Philippines is to make the payment of regular VAT under Section 102 (a) dependent on the generosity of the taxpayer. The provider of services can choose to pay the regular VAT or avoid it by stipulating payment in foreign currency inwardly remitted by the payer-recipient. Such interpretation removes Section 102 (a) as a tax measure in the Tax Code, an interpretation this Court cannot sanction. A tax is a mandatory exaction, not a voluntary contribution.

Hence, petitioner should have at the very least shown evidence on where their recipient is doing business. Outside such proof, there is negligence on petitioner for not showing sufficient evidence to support its claim.

11. Petitioner filed their judicial claim for refund prematurely as less than 120 days have passed from the alleged filing of the administrative claim to the filing of the judicial claim. Under Section

112(D) of the NIRC of 1997, petitioner has 120 days within which to process claims for refund of unutilized input tax, to wit:

'SEC. 112. Refunds or Tax Credits of Input Tax.

xxx

(D) Period Within Which Refund or Tax Credit of Input Taxes Shall be Made. – In proper cases, the Commissioner shall grant a refund or issue the tax credit certificate for creditable input taxes within one hundred twenty (120) days from the date of submission of complete documents in support of the application filed in accordance with Subsections (A) and (B) hereof.

In case of full or partial denial of the claim for tax refund or tax credit, or the failure on the part of the Commissioner to act on the application within the period prescribed above, the taxpayer affected may within thirty (30) days from the receipt of the decision denying the claim or after the expiration of the one hundred twenty day-period, appeal the decision or the unacted claim with the Court of Tax Appeals.'

12. Furthermore, in an action for refund the burden of proof is on the taxpayer to establish its right to refund and failure to sustain the burden is fatal to the claim for refund/credit. This is so because exemptions from taxation are highly disfavored in law and he who claims exemption must be able to justify his claim by the clearest grant of organic or statutory law. An exemption from the common burden cannot be permitted to exist upon vague implications **(Asiatic Petroleum Co. vs Llanes, 49 Phil. 466 cited in Collector of Internal Revenue v Manila Jockey Club, Inc., 98 Phil. 670).**"

During trial, petitioner presented and formally offered pieces of documentary and testimonial evidence. In a Resolution[7] dated May 10, 2013, petitioner's Exhibits "A" to "D-2", "D-4" to "D-7" , "G" to "I-13", "I-15" to "J-6", "K-1" to "K-9", "K-11" to "K-22", "M1" to "M2401", and "S" to "AA-1" were admitted; while Exhibits "D-3", "E-1" to "E-12", "F", "K-10", "L", "R-1" and "R-2" were denied admission. Petitioner then filed a Motion for Reconsideration[8] on June 5, 2013; while respondent filed her Comment[9] thereto on June 21, 2013. In a Resolution[10] issued on July 9, 2013, this Court

[7] Docket, pp. 1056-1058.
[8] Docket, pp. 1062-1070.
[9] Docket, pp. 1078-1083.
[10] Docket, pp. 1086-1088.

partially granted petitioner's Motion for Reconsideration and admitted Exhibits "D-3", "E-1" to "E-3", "F", "R-1" and "R-2", but denied admission of Exhibits "L", "E-4", "E-5", "E-6", "E-7", "E-8", "E-9", "E-10", "E-11" and "E-12".

In a Resolution[11] dated July 10, 2013, counsels for respondent manifested that they are submitting the instant case for decision considering that no Memorandum Report was made in this case. Thus, counsels for respondent were given thirty (30) days within which to file respondent's Memorandum. On the other hand, petitioner was given twenty (20) days from receipt of the said Resolution to file its Memorandum.

Petitioner filed its Submission (With Motion to Set Commissioner's Hearing)[12] on August 6, 2013, praying for the following: (1) noting the submission of the original computer print-out of Exhibit "L"; (2) setting of a Commissioner's Hearing for the comparison of the formally offered copy of Exhibit "L"; and (3) allowing the deferment of the filing of petitioner's Memorandum pending the resolution of the said Submission and Motion.

In the Resolution[13] promulgated on August 13, 2013, the Court noted the Submission (With Motion to Set Commissioner's Hearing) and respondent was ordered to comment on petitioner's motion. Respondent failed to file her Comment.[14] In a Resolution[15] dated September 25, 2013, this Court denied petitioner's Submission (With Motion to Set Commissioner's Hearing) for lack of merit.

On November 4, 2013, the instant case was submitted for decision,[16] considering respondent's Memorandum[17] filed on August 7, 2013 and petitioner's Memorandum[18] filed on October 29, 2013.

THE ISSUES

The issues[19] as stipulated by the parties are as follows:

> "A. WHETHER OR NOT PETITIONER IS ENTITLED TO THE CLAIM FOR REFUND OF OR THE ISSUANCE OF TAX CREDIT CERTIFICATE (TCC) FOR EXCESS OR UNUTILIZED INPUT VAT IN

[11] Docket, p. 1091.
[12] Docket, pp. 1092-1096.
[13] Docket, p. 1119.
[14] Docket, p. 1121.
[15] Docket, pp. 1123-1125.
[16] Docket, p. 1147.
[17] Docket, pp. 1097-1112.
[18] Docket, pp. 1126-1146.
[19] Docket, pp. 74-75.

THE AMOUNT OF PHP33,868,101.19 FOR THE 1ST QUARTER OF CY 2010.

B. WHETHER OR NOT PETITIONER INCURRED INPUT VAT ON ITS PURCHASES OF GOODS AND SERVICES ATTRIBUTABLE TO ZERO-RATED SALES FOR THE 1ST QUARTER OF CY 2010.

C. WHETHER OR NOT THE INPUT VAT INCURRED BY PETITIONER FOR THE 1ST QUARTER OF CY 2010 IS DULY SUPPORTED BY VAT INVOICES AND OFFICIAL RECEIPTS.

D. WHETHER OR NOT THE INPUT VAT INCURRED BY PETITIONER FOR THE 1ST QUARTER OF CY 2010 AMOUNTING TO PHP33,868,101.19 WAS APPLIED AGAINST ANY OUTPUT VAT OR CARRIED OVER TO SUCCEEDING TAXABLE PERIODS.

E. WHETHER OR NOT PETITIONER HAD ZERO-RATED SALES FOR THE 1ST QUARTER OF CY 2010, THE CONSIDERATION FOR WHICH WAS PAID FOR IN ACCEPTABLE FOREIGN CURRENCY AND ACCOUNTED FOR IN ACCORDANCE WITH THE RULES AND REGULATIONS OF THE BANGKO SENTRAL NG PILIPINAS (BSP) IN RELATION TO THE PROVISIONS OF SECTION 108(B)(2), TAX CODE, AS AMENDED.

F. WHETHER OR NOT PETITIONER'S FILING OF ITS ADMINISTRATIVE CLAIM FOR REFUND CONSTITUTES EXHAUSTION OF ADMINISTRATIVE REMEDIES AND COMPLIES WITH THE REQUIREMENTS UNDER SECTION 112(C), TAX CODE."

THE COURT'S RULING

Section 112(A) of the National Internal Revenue Code (NIRC) of 1997 allows the refund of unutilized input VAT earned from zero-rated or effectively zero-rated sales. The provision reads:

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): x x x x

Based on the above-quoted provision, in order to be entitled to a refund or tax credit of input VAT payments attributable to zero-rated or effectively zero-rated sales, the following requisites must be satisfied:

1. that the taxpayer must be VAT-registered;
2. that there must be zero-rated or effectively zero-rated sales;
3. that input taxes were incurred or paid;
4. that such input VAT payments are directly attributable to zero-rated sales or effectively zero-rated sales;
5. that the input VAT payments were not applied against any output VAT liability; and
6. that the claim for refund was filed within the two-year prescriptive period.

Before discussing the other requisites mentioned in the preceding paragraph, the Court shall first rule on the timeliness of the filing of the instant claim.

In the case of *Commissioner of Internal Revenue v. Mirant Pagbilao Corporation (formerly Southern Energy Quezon, Inc.),*[20] the Supreme Court held that the reckoning of the two-year prescriptive period for filing a claim for input VAT refund under Section 112(A) of the NIRC of 1997 should start from the close of the taxable quarter when the relevant sales were made pertaining to the input VAT regardless of whether the said tax was paid or not.

In the instant petition, the subject of the claim for refund or issuance of tax credit certificate is petitioner's unutilized creditable input VAT attributable to its zero-rated sales for the first quarter of 2010. Hence, counting from March 31, 2010, the close of the first quarter of 2010, petitioner had until March 31, 2012 within which to file its administrative claim with respondent. Evidently, petitioner seasonably filed its administrative claim for the period covering the first quarter of 2010 on October 21, 2011.[21]

[20] G.R. No. 172129, September 12, 2008.
[21] Exhibits "G" and "H"

With respect to the filing of the judicial claim, Section 112(C) of the NIRC of 1997, as amended, is instructive. The said provision is quoted hereunder for ready reference:

> SEC. 112. *Refunds or Tax Credits of Input Tax.* –
>
> xxx xxx xxx
>
> (C) *Period within which Refund or Tax Credit of Input Taxes shall be Made.* – In proper cases, the Commissioner shall grant a refund or issue the tax credit certificate for creditable input taxes within one hundred twenty (120) days from the date of submission of complete documents in support of the application filed in accordance with Subsection (A) hereof.
>
> In case of full or partial denial of the claim for tax refund or tax credit, or the failure on the part of the Commissioner to act on the application within the period prescribed above, the taxpayer affected may, within thirty (30) days from the receipt of the decision denying the claim or after the expiration of the one hundred twenty day-period, appeal the decision or the unacted claim with the Court of Tax Appeals.

The nature of the 120-day period was discussed by the Supreme Court in the consolidated cases of *Mindanao II Geothermal Partnership v. Commissioner of Internal Revenue and Mindanao I Geothermal Partnership v. Commissioner of Internal Revenue.*[22] The pertinent portions of the said decision read:

> We summarize the rules on the determination of **the prescriptive period for filing a tax refund or credit of *unutilized input VAT* as provided in Section 112 of the 1997 Tax Code**, as follows:
>
> (1) An administrative claim must be filed with the CIR within two years after the close of the taxable quarter when the zero-rated or effectively zero-rated sales were made.
>
> (2) The CIR has 120 days from the date of submission of complete documents in support of the administrative claim within which to decide whether to grant a refund or issue a tax credit certificate. The 120-day period may

[22] G.R. Nos. 193301 and 194637, March 11, 2013.

extend beyond the two-year period from the filing of the administrative claim if the claim is filed in the later part of the two-year period. If the 120-day period expires without any decision from the CIR, then the administrative claim may be considered denied by inaction.

(3) A judicial claim must be filed with the CTA within 30 days from the receipt of the CIR's decision denying the administrative claim or from the expiration of the 120-day period without any action from the CIR.

(4) All taxpayers, however, can rely on BIR Ruling No. DA-489-03 from the time of its issuance on 10 December 2003 up to its reversal by this Court in *Aichi* on 6 October 2010, as an exception to the mandatory and jurisdictional 120+30 day periods.

Based on the foregoing, the 120-day period ended on February 18, 2012 reckoned from October 21, 2011[23], the date when petitioner filed its administrative claim and submitted the documents in support of its application for refund. Counting therefrom, petitioner may appeal its claim for refund to the CTA within 30 days or until March 19, 2012. Clearly, the instant Petition for Review was timely filed on March 19, 2012.

The Court shall now discuss whether or not petitioner complied with the other requisites for it to be entitled to its claim for tax refund.

Petitioner's claim for refund of excess or unutilized input VAT finds legal support in Sections 108(B)(1) and (2) and 110(B) of the NIRC of 1997, as amended, which state:

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

xxx 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: 9r

[23] Exhibits "G" and "H"

(1) Processing, manufacturing or repacking goods for other persons doing business outside the Philippines which goods are subsequently exported, where the services are paid for in acceptable foreign currency and accounted for in accordance with the rules and regulations of the Bangko Sentral ng Pilipinas (BSP);

(2) Services other than those mentioned in the preceding paragraph rendered to a person engaged in business conducted outside the Philippines or to a nonresident person not engaged in business who is outside the Philippines when the services are performed, the consideration for which is paid for in acceptable foreign currency and accounted for in accordance with the rules and regulations of the Bangko Sentral ng Pilipinas (BSP);

SEC. 110. *Tax Credits.* –

xxx xxx xxx

(B) *Excess Output or Input Tax.* – If at the end of any taxable quarter the output tax exceeds the input tax, the excess shall be paid by the VAT-registered person. If the input tax exceeds the output tax, the excess shall be carried over to the succeeding quarter or quarters: xxx *Provided, however*, That any input tax attributable to zero-rated sales by a VAT-registered person may at his option be refunded or credited against other internal revenue taxes, subject to the provisions of Section 112.

In the case of *Commissioner of Internal Revenue v. Burmeister and Wain Scandinavian Contractor Mindanao, Inc.*,[24] the Supreme Court held that in order for the supply of services to be VAT zero-rated under Section 108(B)(2) of the NIRC of 1997, as amended,[25] the following requisites must be met:

1. the services by a VAT-registered person must be other than processing, manufacturing or repacking of goods;
2. the payment for such services must be in acceptable foreign currency accounted for in accordance with the BSP rules and regulations; and
3. the recipient of such services is doing business outside the Philippines.

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[24] G.R. No. 153205, January 22, 2007.
[25] Formerly Section 102(b)(2) of the NIRC of 1977, as amended.

Corollary to the second requisite, Sections 113(A)(2), (B)(1), (2)(c) and (3) of the NIRC of 1997, as amended, as implemented by Sections 4.113-1(A)(2), B(1) and (2)(c) of Revenue Regulations (RR) No. 16-05 provide that a VAT taxpayer, like herein petitioner, shall for every lease of goods or properties and for every sale, barter or exchange of services, issue a VAT official receipt which must contain the following information:

> SEC. 113. *Invoicing and Accounting Requirements for VAT-Registered Persons.* –
>
> (A) *Invoicing Requirements.* – A VAT-registered person shall issue:
>
> xxx xxx xxx
>
> (2) A **VAT official receipt** for every lease of goods or properties, and **for every sale, barter or exchange of services**.
>
> (B) *Information Contained in the VAT Invoice or VAT Official Receipt.* – The following information shall be indicated in the VAT invoice or VAT official receipt:
>
> (1) A statement that the seller is a VAT-registered person, followed by his Taxpayer's Identification Number (TIN);
>
> (2) The total amount which the purchaser pays or is obligated to pay to the seller with the indication that such amount includes the value-added tax: *Provided*, That:
>
> xxx xxx xxx
>
> (c) If the sale is subject to zero percent (0%) value-added tax, the term **'zero-rated sale'** shall be written or printed prominently on the invoice or receipt;
>
> xxx xxx xxx
>
> (3) The date of transaction, quantity, unit cost and description of the goods or properties or nature of the service; ge

SECTION 4.113-1. *Invoicing Requirements.* –

(A) ***A VAT-registered person shall issue:*** –

xxx xxx xxx

(2) A **VAT official receipt** for every lease of goods or properties, and **for every sale, barter or exchange of services**.

Only VAT-registered persons are required to print their **TIN followed by the word 'VAT' in their invoice or official receipts**. Said documents shall be considered as a VAT Invoice or VAT official receipt. All purchases covered by invoices/receipts other than VAT Invoice/VAT Official Receipt shall not give rise to any input tax.

VAT invoice/official receipt shall be prepared at least in duplicate, the original to be given to the buyer and the duplicate to be retained by the seller as part of his accounting records.

(B) *Information contained in VAT invoice or VAT official receipt*. – The following information shall be indicated in VAT invoice or VAT official receipt:

(1) A statement that the seller is a VAT-registered person, followed by his TIN;

(2) The total amount which the purchaser pays or is obligated to pay to the seller with the indication that such amount includes the VAT; Provided, That:

xxx xxx xxx

(c) If the sale is subject to zero percent (0%) VAT, the term **'zero-rated sale'** shall be written or printed prominently on the invoice or receipt; (Emphasis supplied)

Pursuant to the foregoing provisions, the foreign currency remittances referred to under Section 108(B)(2) of the NIRC of 1997, as amended, must likewise be supported by VAT zero-rated official receipts.

Records confirm that petitioner is duly registered with the BIR as a VAT taxpayer[26] and the services it performs in the Philippines, through its regional operating headquarters (ROHQ), such as accounting, valuation and information systems maintenance and development services[27] are not in the same category as "processing, manufacturing or repacking of goods."

For services rendered for the first quarter of 2010, petitioner received foreign currency payments which were accounted for in accordance with the BSP rules and regulations, as evidenced by sales invoices and official receipts issued by petitioner to its alleged non-resident foreign clients, various inward remittance advices, and bank statements.[28]

For the said taxable quarter, petitioner allegedly rendered services to the following entities:[29]

1. Deutsche Bank Aktiengesellschaft, Inlandsbank
2. Deutsche Bank Aktiengesellschaft, Filiale Amsterdam
3. Deutsche Bank, Sociedad Española
4. Deutsche Bank Aktiengesellschaft, Filiale Zurich
5. Deutsche Bank Aktiengesellschaft, Asia Pacific Head Office
6. Deutsche Bank Aktiengesellschaft, Filiale Singapur
7. Deutsche Bank Aktiengesellschaft, Filiale Karachi
8. Deutsche Bank Aktiengesellschaft, Filiale Ho-Chi-Minh-Stadt
9. Deutsche Bank Aktiengesellschaft, Filiale Seoul
10. Deutsche Bank Aktiengesellschaft, Filiale New York
11. Deutsche Bank Aktiengesellschaft, Filiale London
12. Deutsche Bank Aktiengesellschaft, Filiale Tokyo
13. Deutsche Bank Aktiengesellschaft, Filiale Paris
14. Deutsche Bank Aktiengesellschaft, Filiale Prag
15. Deutsche Bank Luxembourg S.A.
16. Deutsche Securities, Inc.
17. Deutsche Bank (China) Co. Ltd., Beijing Branch
18. Deutsche Bank (China) Co. Ltd., Guangzhou Branch
19. Deutsche Bank (China) Co. Ltd., Shanghai Branch
20. DWS Holding & Service GmbH
21. RREEF Management GmbH
22. DB Hedgeworks, LLC
23. Deutsche Bank Real Estate (Japan) Y.K.
24. Deutsche Bank Securities, Inc.
25. Deutsche Asia Pacific Holdings Pte Ltd
26. PT. Deutsche Securities Indonesia
27. Deutsche Group Services Pty Limited

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[26] Exhibit "B"
[27] Exhibit "F"; Notes to the Financial Statements, No. 1, Reporting Entity, docket, p. 664.
[28] Exhibits "M-1" to "M-673"
[29] Exhibit "S", docket, pp. 1010 -1011.

28. Deutsche Bank PBC Spolka Akcyjna
29. Deutsche Bank Trust Company Americas
30. DB Services New Jersey, Inc.
31. Deutsche Bank National Trust Company
32. DB Finance, Inc.
33. DB International (Asia) Limited
34. DBOI Global Services Private Limited

To prove that its clients are non-resident foreign corporations doing business outside the Philippines, petitioner presented the following documents:

1. SEC Certifications of Non-Registration of Company;[30]
2. Authenticated Articles of Association of Deutsche Bank Aktiengesellschaft;[31]
3. Authenticated Certificate of Registration of Deutsche Bank Aktiengesellschaft, Singapore;[32]
4. Authenticated Certificate of Registration of Deutsche Bank Aktiengesellschaft, Asia Pacific Head Office;[33]
5. Authenticated Certificate of Good Standing of Deutsche Bank Aktiengesellschaft, New York;[34]
6. Authenticated Certificate of Incorporation of Deutsche Asia Pacific Holdings Pte. Ltd.;[35]
7. Authenticated Certificate of Incorporation of Deutsche Securities Inc.;[36] and
8. IntraGroup Service Agreements.[37]

However, this Court finds that the enumerated documents, standing alone, are insufficient to prove that petitioner's clients are non-resident foreign corporations doing business outside the Philippines.

While the SEC Certificates of Non-Registration show that the named entities therein are not registered corporations/partnerships in the Philippines, the same do not prove that such entities are non-resident foreign corporations doing business outside the Philippines. Likewise, the IntraGroup Service Agreements only show the names of petitioner's customers to whom it rendered services but the same do not establish that such customers are non-resident foreign corporations doing business outside the Philippines. Also, the Articles of Association and Certificates of Registration/Incorporation of Foreign Company only prove that the named entities

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[30] Exhibits "I-1" to "I-35"
[31] Exhibit "J-1"
[32] Exhibit "J-2"
[33] Exhibit "J-3"
[34] Exhibit "J-4"
[35] Exhibit "J-5"
[36] Exhibit "J-6"
[37] Exhibits "K-1" to "K-22"

therein were incorporated/organized abroad but do not establish that such entities are not doing business in the Philippines.

To be considered as non-resident foreign corporation doing business outside the Philippines, each entity must be supported, at the very least, by both SEC certificate of non-registration of corporation/partnership and certificate/articles of foreign incorporation/association. Thus, only the following clients of petitioner shall be considered as non-resident foreign corporations doing business outside the Philippines:

COMPANY NAME	LOCATION
1. Deutsche Bank (China) Co., Ltd., Beijing Branch	Beijing, China
2. Deutsche Bank (China) Co., Ltd., Shanghai Branch	Shanghai, China
3. Deutsche Bank Aktiengesellschaft, Asia Pacific Head Office	Singapore - APHO
4. Deutsche Bank Aktiengesellschaft, Filiale Ho-Chi-Minh-Stadt	Ho Chi Minh City, Vietnam
5. Deutsche Bank Aktiengesellschaft, Filiale London	London
6. Deutsche Bank Aktiengesellschaft, Filiale New York	New York
7. Deutsche Bank Aktiengesellschaft, Filiale Singapore	Singapore
8. Deutsche Bank Luxembourg S.A.	Luxembourg
9. DB Finance Inc.	Tokyo, Japan
10. DB International (Asia) Limited	Singapore
11. Deutsche Asia Pacific Holdings Pte Ltd.	Singapore- DAPH
12. Deutsche Group Services Pty Limited	Sydney, Australia
13. Deutsche Securities Inc.	Tokyo
14. DWS Holding & Service GMBH	Frankfurt, Germany
15. PT Deutsche Securities Indonesia	Jakarta, Indonesia

Accordingly, petitioner's sales of services to the afore-mentioned entities for the first quarter of 2010 in the amount of €9,859,736.48 with peso equivalent of ₱627,255,650.48, as presented below, qualify for VAT zero-rating under Section 108(B)(2) of the NIRC of 1997, as amended:

Company Name	OR #	OR Exh. No.	Inward Remittance Exh. No.	Amount Collected in Euro	Peso Equivalent
DB China Beijing	718	M-286	M-287	€ 18,499.48	₱ 1,141,540.01
DB China Shanghai	630	M-145	M-146	27,955.62	1,851,506.30
DB China Shanghai	630	M-145	M-146	22,244.15	1,473,234.50
DB China Shanghai	630	M-348	M-349	8,349.15	552,965.87
DB China Shanghai	705	M-449	M-452	12,331.91	770,681.48
DB China Shanghai	726	M-291	M-292	13,875.03	843,529.68
DB China Shanghai	726	M-291	M-292	27,750.60	1,687,092.18
DB China Shanghai	726	M-576	M-577	3,764.50	228,862.02
DB AG Asia Pacific H.O.	635	M-132	M-133	394,160.29	26,127,308.98
DB AG Asia Pacific H.O.	636	M-368	M-369	21,501.92	1,425,276.27
DB AG Asia Pacific H.O.	638	M-398	M-399	17,079.14	1,132,107.87
DB AG Asia Pacific H.O.	641	M-169	M-170	6,032.34	401,207.92
DB AG Asia Pacific H.O.	642	M-165	M-166	17,584.20	1,169,516.35

DB AG Asia Pacific H.O.	644	M-161	M-162	62,269.31	4,141,500.67
DB AG Asia Pacific H.O.	645	M-181	M-182	62,389.38	4,149,486.47
DB AG Asia Pacific H.O.	648	M-177	M-178	44,993.83	2,979,401.43
DB AG Asia Pacific H.O.	649	M-201	M-202	24,041.78	1,591,998.59
DB AG Asia Pacific H.O.	653	M-520	M-521	6,824.91	443,898.29
DB AG Asia Pacific H.O.	654	M-433	M-434	292,870.92	19,048,588.22
DB AG Asia Pacific H.O.	655	M-536	M-537	112,370.67	7,308,689.51
DB AG Asia Pacific H.O.	656	M-475	M-476	17,432.74	1,133,841.00
DB AG Asia Pacific H.O.	657	M-480	M-481	5,480.82	356,477.47
DB AG Asia Pacific H.O.	659	M-515	M-515	2,748.62	178,772.72
DB AG Asia Pacific H.O.	668	M-28	M-29	12,600.00	807,070.32
DB AG Asia Pacific H.O.	671	M-38	M-39	12,500.00	800,665.00
DB AG Asia Pacific H.O.	674	M-65	M-66	15,000.00	960,798.00
DB AG Asia Pacific H.O.	675	M-74	M-75	5,000.00	320,266.00
DB AG Asia Pacific H.O.	676	M-70	M-71	4,000.00	256,212.80
DB AG Asia Pacific H.O.	677	M-79	M-80	58,064.51	3,719,217.67
DB AG Asia Pacific H.O.	678	M-89	M-90	12,000.00	768,638.40
DB AG Asia Pacific H.O.	679	M-104	M-105	24,000.00	1,537,276.80
DB AG Asia Pacific H.O.	683	M-84	M-85	12,000.00	768,638.40
DB AG Asia Pacific H.O.	684	M-109	M-110	12,000.00	768,638.40
DB AG Asia Pacific H.O.	685	M-2	M-3	12,000.00	768,638.40
DB AG Asia Pacific H.O.	686	M-16	M-17	12,899.99	826,285.64
DB AG Asia Pacific H.O.	714	M-552	M-553	65,341.53	4,023,293.63
DB AG Asia Pacific H.O.	720	M-608	M-609	78,693.93	4,786,731.42
DB AG Asia Pacific H.O.	722	M-221	M-222	144,121.22	8,766,490.27
DB AG Asia Pacific H.O.	724	M-57	M-58	449,291.54	27,329,146.36
DB AG Ho Chi Minh	661	M-500	M-501	3,860.51	249,590.08
DB AG Ho Chi Minh	702	M-562	M-563	941.95	58,949.87
DB AG Ho Chi Minh	709	M-624	M-625	3,538.50	219,977.22
DB AG London	660	M-191	M-192	451,787.52	29,209,011.28
DB AG London	699	M-353	M-354	1,457,267.26	91,361,476.42
DB AG London	716	M-637	M-638	567,057.78	34,915,618.81
DB AG London	721	M-632	M-633	107,168.22	6,515,270.50
DB AG New York	693	M-127	M-128	14,792.57	930,121.30
DB AG New York	701	M-11	M-12	381,255.90	23,952,363.79
DB AG New York	707	M-260	M-261	2,075,285.62	130,061,885.32
DB AG New York	725	M-121	M-122	9,858.84	599,685.63
DB AG Singapore	637	M-363	M-364	56,805.09	3,765,382.20
DB AG Singapore	639	M-393	M-394	307.00	20,349.80
DB AG Singapore	643	M-250	M-251	35,887.13	2,386,835.07
DB AG Singapore	646	M-186	M-187	109,861.28	7,306,818.80
DB AG Singapore	651	M-206	M-207	2,905.40	192,389.78
DB AG Singapore	658	M-468	M-469	89,354.82	5,811,717.91
DB AG Singapore	662	M-441	M-442	116,702.69	7,642,509.06
DB AG Singapore	667	M-245	M-246	25,000.02	1,601,331.28
DB AG Singapore	669	M-43	M-44	28,125.00	1,801,496.25
DB AG Singapore	670	M-7	M-8	15,000.00	960,798.00
DB AG Singapore	672	M-33	M-34	28,350.00	1,815,908.22
DB AG Singapore	673	M-24	M-25	16,125.02	1,032,859.13
DB AG Singapore	680	M-99	M-100	25,000.00	1,601,330.00
DB AG Singapore	681	M-94	M-95	15,000.00	960,798.00
DB AG Singapore	687	M-20	M-21	24,900.00	1,594,924.68
DB AG Singapore	713	M-557	M-558	124,343.80	7,656,258.10
DB AG Singapore	723	M-612	M-613	36.29	2,207.42

DB Finance Inc.	691	M-334	M-335	1,382.50	88,096.36
DB International (Asia) Limited	640	M-339	M-340	46,250.10	3,068,994.76
DB International (Asia) Limited	729	M-670	M-671	46,250.10	2,813,264.08
DB Luxembourg S.A.	650	M-544	M-545	6,981.30	462,287.72
DB Luxembourg S.A.	692	M-445	M-446	31,776.99	2,017,403.52
DB Luxembourg S.A.	727	M-660	M-661	10,170.01	618,613.23
DT Asia Pacific Holdings	633	M-313	M-314	27,750.06	1,821,844.16
DT Group Services Pty Limited	663	M-323	M-324	498,208.72	32,634,315.25
DT Group Services Pty Limited	666	M-196	M-197	25,973.26	1,680,815.19
DT Group Services Pty Limited	666	M-216	M-217	7,443.75	481,709.58
DT Group Services Pty Limited	666	M-373	M-374	23,710.43	1,534,380.01
DT Group Services Pty Limited	666	M-485	M-486	31,791.20	2,057,313.25
DT Group Services Pty Limited	666	M-527	M-528	6,958.43	450,302.92
DT Group Services Pty Limited	704	M-579	M-580	29,326.91	1,832,782.31
DT Group Services Pty Limited	706	M-403	M-404	3,930.37	246,577.26
DT Securities Inc.	634	M-280	M-281	984,749.96	65,275,135.85
DT Securities Inc.	711	M-61	M-62	118,150.10	7,341,256.46
DWS Hold Service	717	M-665	M-666	18,500.04	1,141,574.57
PT Deutsche Securities Indonesia	700	M-318	M-319	1,850.01	115,628.77
TOTAL				**€9,859,736.48**	**₱627,255,650.48**

The rest of petitioner's declared zero-rated sales in the amount of ₱231,060,219.61 (₱858,315,870.09 less ₱627,255,650.48) shall be denied VAT zero-rating for petitioner's failure to prove that the entities to whom it rendered services are non-resident foreign corporations doing business outside the Philippines.

Petitioner alleged that the entire amount of ₱33,868,101.19, reflected in its Quarterly VAT Return for the first quarter of 2010 as input VAT from current purchase transactions, is attributable to its zero-rated sales of services for the said quarter. Below is the breakdown of the input tax of ₱33,868,101.19:

Input VAT from Current Transactions	
Purchase of Capital Goods exceeding 1 Million	₱ 1,256,449.28
Purchase of Capital Goods not exceeding 1 Million	36,803.79
Domestic Purchases of Goods Other than Capital Goods	1,664,409.91
Domestic Purchases of Services	30,812,560.86
Services Rendered by Non-Residents	97,877.35
Total Input VAT	**₱33,868,101.19**

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It must be noted that part of the total input VAT claim of ₱33,868,101.19 is the amount of ₱1,256,449.28, representing input VAT on purchases of capital goods exceeding ₱1 Million. Pursuant to Section 110(A) of the NIRC of 1997, as amended, as implemented by Section 4.110-3 of RR No. 16-2005, input VAT claim on capital goods purchases attributable to zero-rated sales may be claimed either in full during the month of acquisition, or spread over a period of time, depending on the aggregate acquisition cost of the capital goods in the calendar month. If the aggregate acquisition cost exceeds ₱1 Million, the claim for input tax should be spread over 60 months or the estimated useful life of the capital goods, whichever is shorter. On the other hand, if the aggregate acquisition cost does not exceed ₱1 Million, the total input taxes shall be allowed as credit/refund in the month of acquisition.

While petitioner was able to substantiate the amount of ₱741,571.07 out of the total claimed input VAT of ₱1,256,449.28 on capital goods purchases exceeding ₱1 Million, only the amortization[38] for the first quarter of 2010 in the amount of ₱22,027.35 may be claimed by petitioner as valid input tax credits for the same taxable quarter, as determined below:

Registered Name of Supplier	Exhibit No.	Invoice Number	Date of Invoice	Input VAT Reported per QVAT Return	Amortization
Accent Micro Technologies Inc.	M-709	107845	1/14/2010	₱ 3,214.29	₱ 160.71
Accent Micro Technologies Inc.	M-710	107846	1/14/2010	856.71	42.84
Accent Micro Technologies Inc.	M-711	107850	1/14/2010	7,500.00	375.00
Accent Micro Technologies Inc.	M-712	108013	1/20/2010	180,226.29	9,011.31
Accent Micro Technologies Inc.	M-713	108037	1/20/2010	17,035.71	851.79
Accent Micro Technologies Inc.	M-714	108086	1/22/2010	11,040.00	552.00
Accent Micro Technologies Inc.	M-715	108098	1/22/2010	15,428.57	771.43
Accent Micro Technologies Inc.	M-716	108143	1/25/2010	15,428.57	771.43
Accent Micro Technologies Inc.	M-717	108163	1/25/2010	39,214.29	1,960.71
Accent Micro Technologies Inc.	M-732	109303	03/09/2010	439,066.07	7,317.77
Accent Micro Technologies Inc.	M-733	109555	03/22/2010	460.71	7.68
Accent Micro Technologies Inc.	M-734	109683	03/25/2010	1,347.43	22.46
Accent Micro Technologies Inc.	M-735	109734	03/26/2010	4,180.50	69.68
Accent Micro Technologies Inc.	M-736	109736	03/26/2010	2,571.43	42.86
Accent Micro Technologies Inc.	M-737	109754	03/26/2010	4,180.50	69.68
Total				**₱ 741,751.07**	**₱ 22,027.35**

Consequently, the unamortized input VAT of ₱719,723.72 (₱741,751.07 less ₱22,027.35) and the input VAT of ₱514,698.21 pertaining to purchase of capital goods exceeding ₱1 Million, the supporting VAT invoice of which was not presented before this Court, shall be deducted from petitioner's input VAT claim.

[38] Based on estimated useful life of 60 months since the Court cannot ascertain the estimated useful life used by petitioner in depreciating the said capital goods.

In addition, the input VAT of ₱11,556,290.62,[39] as summarized below, shall be disallowed for petitioner's failure to meet the substantiation requirements under Sections 110(A) and 113(A) and (B) of the NIRC of 1997, as amended by RA No. 9337, and as implemented by Sections 4.110-2, 4.110-8 and 4.113-1 of Revenue Regulations No. 16-05:

FINDINGS	DISALLOWED INPUT VAT
1. Domestic purchases of services supported by VAT ORs wherein the input VAT were not separately indicated	₱ 5,470,274.88
2. Domestic purchases of goods other than capital goods supported by VAT invoice wherein the input VAT were not separately indicated	71,165.89
3. Domestic purchases of services without supporting VAT ORs	3,527,052.60
4. Domestic purchases of goods other than capital goods without supporting VAT invoice	1,135,586.84
5. Domestic purchases of capital goods not exceeding P1M supported by VAT invoices dated outside the period of claim	6,596.14
6. Domestic purchase of services supported by VAT OR dated outside the period of claim	3,235.68
7. Overclaimed input VAT on domestic purchases of service supported by VAT OR	89,424.36
8. Input VAT on services rendered by non-residents without supporting documents	97,877.35
9. Input VAT on services supported by documents imprinted with the statement "This document is not a valid source of input tax"	1,155,076.88
TOTAL	**₱ 11,556,290.62**

Thus, only the remaining amount of ₱21,077,388.64 represents petitioner's valid input VAT for the first quarter of 2010.

After applying petitioner's valid input VAT of ₱21,077,388.64 against its output VAT of ₱713,041.78 for the subject period of claim, there remains an excess input VAT of ₱20,364,346.86, which can be attributed to the entire zero-rated sales/receipts declared by petitioner in the amount of ₱858,315,870.09. Accordingly, only the input VAT of ₱14,882,227.02 is attributable to the valid zero-rated sales of ₱627,255,650.48, as computed below:

Input VAT claimed for refund		₱ 33,868,101.19
Less: Disallowances		
Unamortized Input VAT on Capital Goods exceeding ₱1 Million	₱ 719,723.72	
Input VAT on Capital Goods exceeding ₱1 Million without supporting documents	514,698.21	
Input VAT on purchases of services and goods other than capital goods	11,556,290.62	12,790,712.55
Valid Input VAT		**₱21,077,388.64**

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[39] See Annex A of this Court's Findings for details.

Less: Output VAT		713,041.78
Valid Excess Input VAT		**₱20,364,346.86**

Valid Zero-Rated Sales/Receipts	627,255,650.48
Divided by Total Reported Zero-Rated Sales/Receipts	858,315,870.09
Multiply by Valid Excess Input VAT	20,364,346.86
Excess Input VAT attributable to the Valid Zero-Rated Sales/Receipts	**₱14,882,227.02**

Even though the claimed input VAT was carried over by petitioner in the succeeding Quarterly VAT Returns,[40] the same remained unutilized until it was deducted[41] from petitioner's total available input tax in the fourth quarter of 2011. As a result, the subject claim no longer formed part of the excess input VAT of ₱254,551,269.86[42] as of the fourth quarter of 2011 which was carried over/applied to the succeeding first quarter of 2012.[43]

WHEREFORE, premises considered, the instant Petition for Review is hereby **PARTIALLY GRANTED**. Accordingly, let a tax refund or a tax credit certificate be issued in favor of petitioner in the amount of **₱14,882,227.02** representing its unutilized input VAT attributable to its zero-rated sales for the first quarter of 2010.

SO ORDERED.

Juanito C. Castañeda, Jr.
JUANITO C. CASTAÑEDA, JR.
Associate Justice

WE CONCUR:

CAESAR A. CASANOVA
Associate Justice

(On Leave)
AMELIA R. COTANGCO-MANALASTAS
Associate Justice

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[40] Exhibits "D-1" to "D-6" and "R-1"
[41] Line 23E of Exhibit "R-1"
[42] Line 27, Exhibit "R-1"
[43] Line 20E, Exhibit "R-2"

ATTESTATION

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

Juanito C. Castañeda, Jr.
JUANITO C. CASTAÑEDA, JR.
Associate Justice
Chairperson

CERTIFICATION

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

ROMAN G. DEL ROSARIO
Presiding Justice

Findings	Exhibit No.	Invoice Number	Input VAT Amount
1 Domestic purchases of services supported by VAT ORs wherein the input VAT were not separately indicated			
6-24 PROPERTY HOLDINGS INC.	M-675	210-213	377,508.24
6-3 PROPERTY HOLDINGS INC.	M-693	SA294	167,013.36
6-3 PROPERTY HOLDINGS INC.	M-693	SA295	1,065.96
6-3 PROPERTY HOLDINGS INC.	M-693	SA296	3,511.62
ACCENTURE	M-2249	512	1,021,265.43
ACCENT MICRO TECHNOLOGIES INC	M-729	107413	11,040.00
ACCENT MICRO TECHNOLOGIES INC	M-730	108316	277.45
ACCENT MICRO TECHNOLOGIES INC	M-731	109054	11,040.00
ASIA SELECT INC	M-756	10317	4,731.58
ASIA SELECT INC	M-757	10409	4,492.58
ASIA SELECT INC	M-758	10460	4,074.13
ASIA SELECT INC	M-759	10563	4,519.19
ASIA SELECT INC	M-760	10647	3,964.18
ASIA SELECT INC	M-761	10721	4,279.18
BENCHMARK CONSULTING CO.	M-811	20100001	10,800.00
BENCHMARK CONSULTING CO.	M-812	2010-00-24	1,200.00
Big Media Imaging Systems Inc.	M-819	2942	85.71
BIGFISH RESTAURANT CONCEPTS INC	M-822	404	1,607.14
BIGFISH RESTAURANT CONCEPTS INC	M-822	405	916.07
BIGFISH RESTAURANT CONCEPTS INC	M-823	408	13,323.21
BONIFACIO BISTRO ITALIANO	M-824	11210	353.57
BONIFACIO BISTRO ITALIANO	M-825	21510	5,560.71
BUSINESSWORKS, INC.	M-829	2651	1,408.16
BUSINESSWORKS, INC.	M-830	2653	10,714.29
BUSINESSWORKS, INC.	M-831	2659	10,714.29
BUSINESSWORKS, INC.	M-832	2660	428.57
CIBI INFORMATION, INC.	M-845	28712	2,106.00
CIBI INFORMATION, INC.	M-846	29150	630.00
DHL EXPRESS PHILS CORP	M-996	D01469802A	3.60
DHL EXPRESS PHILS CORP	M-1000	D01477492A	483.60
DHL EXPRESS PHILS CORP	M-1000	MNL976157	5,718.75
DHL EXPRESS PHILS CORP	M-1000	D01475199A	3.60
DHL EXPRESS PHILS CORP	M-1002	D01480902A	3.60
DHL EXPRESS PHILS CORP	M-1004	D01509310	3.60
DHL EXPRESS PHILS CORP	M-1005	D01509812	502.60
DHL EXPRESS PHILS CORP	M-1015	MNL978732	5,148.21
DHL EXPRESS PHILS CORP	M-1016	MNL981149	5,719.69
ELCRON CONSTRUCTION	M-1017	3	3,053.57
ELLENAIRE ELECTRO MECHANICAL CORP	M-1019	150	9,798.00
ELLENAIRE ELECTRO MECHANICAL CORP	M-1020	166	9,798.00
ELLENAIRE ELECTRO MECHANICAL CORP	M-1021	181	9,798.00
ELLENAIRE ELECTRO MECHANICAL CORP	M-1022	189	9,798.00
EXCELSIOR TOURS AND TRANSPORT	M-1041	1110	910.71
Extreme Operations Protective	M-1129	PRF 11.12.2009	6,227.89
FIRST FORTUNA INSURANCE	M-1153	GA-10-00000578	2,950.64
FIRST FORTUNA INSURANCE	M-1154	GA1000000579	2,950.64
FMR CORPORATION	M-1155	121209-BIR	846.43

Findings	Exhibit No.	Invoice Number	Input VAT Amount
FTL HOTELS, INC	M-1160	SOM10-0047	14,711.76
FTL HOTELS, INC	M-1160	SOM10-0051	1,326.72
FTL HOTELS, INC	M-1161	SOM10-0046	10,428.06
FTL HOTELS, INC	M-1161	SOM10-0049	1,325.09
FTL HOTELS, INC	M-1161	SOM10-0050	4,515.84
FTL HOTELS, INC	M-1164	SOM10-0072	11,498.20
GOUDIE ASSOCIATES MANILA LTD.	M-1652	3997B INV10/7699	71,657.14
HOSPITALITY INTERNATIONAL, INC	M-1676	12-85/09	10,528.07
HOSPITALITY INTERNATIONAL, INC	M-1676	10-79/09	18,767.79
HOSPITALITY INTERNATIONAL, INC	M-1676	12-44/09	66,731.40
HOSPITALITY INTERNATIONAL, INC	M-1679	12-45/09	10,026.73
I SYSTEMS INTEGRATORS, INC.	M-1683	996	124,875.00
INTERNATIONAL ELEVATOR & EQUIP	M-1787	7974	127,652.68
JALTAR CORPORATION	M-1789	PRF 1/12/2010	97,497.24
JOHN CLEMENTS CONSULTANTS, INC	M-1795	21967	23,814.00
JOHN CLEMENTS CONSULTANTS, INC	M-1796	21971	33,806.16
JOHN CLEMENTS CONSULTANTS, INC	M-1796	21972	33,806.16
JOHN CLEMENTS CONSULTANTS, INC	M-1797	21973	77,678.57
JOHN CLEMENTS CONSULTANTS, INC	M-1798	21998	960.00
JOHN CLEMENTS CONSULTANTS, INC	M-1799	2818	77,678.57
KC INDUSTRIAL CORP	M-1807	58419	27,053.57
LANTRO PHILS INC	M-1808	2139	1,116.33
LANTRO PHILS INC	M-1809	2218	368.12
MANILA PENINSULA HOTEL, INC.	M-1821	47723	1,632.00
MC ENGINEERING, INC.	M-1830	3204	452,702.15
MC ENGINEERING, INC.	M-1832	3206	270,745.14
MEC NETWORKS CORPORATION	M-1833	3635	14,464.29
MICRO-D INTERNATIONAL, INC.	M-1838	14493	11,250.00
MICRO-D INTERNATIONAL, INC.	M-1838	14494	11,250.00
MICRO-D INTERNATIONAL, INC.	M-1839	14578	129,645.67
MICRO-D INTERNATIONAL, INC.	M-1838	14579	35,519.78
MICRO-D INTERNATIONAL, INC.	M-1839	14585	3,985.71
MICRO-D INTERNATIONAL, INC.	M-1840	14580	2,310.52
MICRO-D INTERNATIONAL, INC.	M-1840	14581	191.69
MICRO-D INTERNATIONAL, INC.	M-1842	14676	125,608.28
MICRO-D INTERNATIONAL, INC.	M-1843	14678	2,433.21
MICRO-D INTERNATIONAL, INC.	M-1843	14679	57.51
MISNET EDUCATION INC.	M-1845	10309	2,057.14
NEXSTEP INC	M-1851	2010001	186,000.00
NEXSTEP INC	M-1852	2010002	156,000.00
NEXSTEP INC	M-1853	2010003	43,200.00
PLDT	M-1887	25497744	188,340.22
PREMIUM SECURITY & INVESTIGATION	M-2098	92795	76.63
PREMIUM SECURITY & INVESTIGATION	M-2099	93063	6,790.06
PREMIUM SECURITY & INVESTIGATION	M-2099	93066	4,139.23
PREMIUM SECURITY & INVESTIGATION	M-2099	93238	54.35
PREMIUM SECURITY & INVESTIGATION	M-2100	93239	36.23
PREMIUM SECURITY & INVESTIGATION	M-2101	93240	1,136.58
PREMIUM SECURITY & INVESTIGATION	M-2102	93376	120.77

Findings	Exhibit No.	Invoice Number	Input VAT Amount
PREMIUM SECURITY & INVESTIGATION	M-2102	93486	4,115.54
PREMIUM SECURITY & INVESTIGATION	M-2102	93489	191.57
PREMIUM SECURITY & INVESTIGATION	M-2103	93487	6,767.04
PREMIUM SECURITY & INVESTIGATION	M-2103	93488	229.89
PREMIUM SECURITY & INVESTIGATION	M-2103	93619	4,067.81
PREMIUM SECURITY & INVESTIGATION	M-2109	94200	18.12
PREMIUM SECURITY & INVESTIGATION	M-2112	94478	114.94
PREMIUM SECURITY & INVESTIGATION	M-2112	94476	7,115.32
PREMIUM SECURITY & INVESTIGATION	M-2113	94477	3,817.10
PREMIUM SECURITY & INVESTIGATION	M-2115	94479	18.12
PROFESSIONAL SKILLS ENRICHMENT	M-2122	3960	10,920.00
PROFESSIONAL SKILLS ENRICHMENT	M-2123	3961	22,920.00
PROFESSIONAL SKILLS ENRICHMENT	M-2124	3963	11,460.00
PSEI FIRESAFETY SYSTEM	M-2129	1426	2,340.00
PSEI FIRESAFETY SYSTEM	M-2126	1389	4,146.43
PSEI FIRESAFETY SYSTEM	M-2127	1390	2,340.00
PSEI FIRESAFETY SYSTEM	M-2128	1413	2,340.00
PSEI FIRESAFETY SYSTEM	M-2128	1414	4,146.43
PSEI FIRESAFETY SYSTEM	M-2130	1427	4,146.43
PSEI FIRESAFETY SYSTEM	M-2132	1442	4,146.43
REALFORM FURNITURE SHOP	M-2142	331	16,800.00
REALFORM FURNITURE SHOP	M-2143	340	110.40
REALFORM FURNITURE SHOP	M-2144	348	9,600.00
SERVCOM, INCORPORATED	M-2162	6533	4,821.43
SINCLAIR KNIGHT MERZ (PHILIPPINES)	M-2177	PS02909	30,720.00
SYCIP SALAZAR HERNANDEZ & GATMAITAN	M-2209	5088178	12,107.76
TAGAYTAY HIGHLANDS INTERNATIONAL	M-2212	SOA 02.05.2010	15,722.68
THEUER EUROLIGHTING	M-2220	SOA 03.04.10	3,214.29
TIERRA INTERNATIONAL CONSTRUCTION	M-2221	PRF 12/21/2009	432,000.00
UNITED GLOBAL REAL ESTATE	M-2232	PRF 01.05.2010	48,870.00
UNIVERSITY OF STO. TOMAS	M-2233	PRF 12.22.09	975.00
UPS-DELBROS INTERNATIONAL	M-2234	4E+11	2,897.00
UPS-DELBROS INTERNATIONAL	M-2235	4E+11	127,620.00
VIVENTIS SEARCH ASIA, INC.	M-2240	2381	43,200.00
VIVENTIS SEARCH ASIA, INC.	M-2241	2493	13,356.00
VRJ HOLDINGS INC.	M-2243	10/01-002	273,908.52
WIL-AN COMMERCIAL INC	M-2245	1830	1,339.29
PLDT	M-1898	28163770	394.00
PLDT	M-1899	28754640	239.40
PLDT	M-1904	29032066	16,200.00
PLDT	M-1906	29363209	197.59
PLDT	M-1907	29363211	42,695.61
PLDT	M-1909	29363224	160.71
PLDT	M-1914	29363245	239.40
PLDT	M-1917	29363257	239.40
PLDT	M-1927	29363280	389.38
PLDT	M-1928	29363281	389.38
PLDT	M-1933	29363289	239.40
PLDT	M-1940	29363301	239.40

Findings	Exhibit No.	Invoice Number	Input VAT Amount
PLDT	M-1947	29363313	6,127.56
PLDT	M-1972	29630760	19,980.00
Sub-total			***5,470,274.88***
2 Domestic purchases of goods other than capital goods supported by VAT invoice wherein the input VAT were not separately indicated			
AB METAL CRAFT MFG	M-707	8266	1,392.86
AB METAL CRAFT MFG	M-708	8279	2,828.57
FIRENZE OF CHICAGO INC.	M-1152	1468	3,092.14
INTENSE CAR AUTO SALON CORP.	M-1786	2093	3,642.86
NATIONAL BOOK STORE INC.	M-1850	843851	925.71
PETALS GALORE FLORIST	M-1862	637	535.71
PRECISION BLACK TONER INC.	M-2091	12507	6,787.50
PRECISION BLACK TONER INC.	M-2092	12751	5,575.71
PRECISION BLACK TONER INC.	M-2093	12760	1,479.11
PRECISION BLACK TONER INC.	M-2094	12816	2,098.93
PRECISION BLACK TONER INC.	M-2095	12906	9,878.57
PRECISION BLACK TONER INC.	M-2096	13043	2,098.93
PRECISION BLACK TONER INC.	M-2097	13146	20,796.43
PSEI FIRESAFETY SYSTEM	M-2125	1425	7,714.29
RELECH TRADING	M-2145	83	1,461.43
SERVCOM, INCORPORATED	M-2161	6649	857.14
Sub-total			***71,165.89***
3 Domestic purchases of services without supporting VAT ORs			
ACCRA LAW OFFICE		1187323	5,400.00
ASCOTT MAKATI INC.		AM09-2309	24,652.80
AVAYA PHILIPPINES INC		AIP0910028/AOS	280,901.50
AVAYA PHILIPPINES INC		AIP0910029/AOS	258,843.26
AVAYA PHILIPPINES INC		AIP0912003/AOS	259,380.85
AVAYA PHILIPPINES INC		AIP0912004/AOS	274,373.58
AVAYA PHILIPPINES INC		AIP1001002/AOS	275,892.35
BUSINESSWORKS, INC.		2654	10,714.29
DEVELOPMENT DIMENSIONS		3240	11,764.29
DHL EXPRESS PHILS CORP		D01457544	3.60
DHL EXPRESS PHILS CORP		D01457643	667.60
DHL EXPRESS PHILS CORP		D01457647	635.60
DHL EXPRESS PHILS CORP		MNL954316	3,916.18
DHL EXPRESS PHILS CORP		MNL959362	3,048.10
DHL EXPRESS PHILS CORP		MNL968382	6,003.35
DIGITAL TELECOMMUNICATIONS		126490000	184,488.24
DIGITAL TELECOMMUNICATIONS		128433944	183,606.48
DIGITAL TELECOMMUNICATIONS		130481479	185,931.12
DIGITAL TELECOMMUNICATIONS		132445913	185,169.60
DIGITAL TELECOMMUNICATIONS		134439730	194,964.72
E.E. BLACK, LTD.		1294	487,669.72
ESCO Audio Visual Pte.Ltd.		ESI26240A	14,464.29
ESCO Audio Visual Pte.Ltd.		ESI26240B	9,964.29
ESCO Audio Visual Pte.Ltd.		ESI26241A	29,288.57
ESCO Audio Visual Pte.Ltd.		ESI26241B	2,892.86
ESCO Audio Visual Pte.Ltd.		ESI29361	2,940.00

Findings	Exhibit No.	Invoice Number	Input VAT Amount
ESCO Audio Visual Pte.Ltd.		ESI29655	690.00
ESCO Audio Visual Pte.Ltd.		ESI29827	6,060.00
ESCO Audio Visual Pte.Ltd.		ESI29904	690.00
Extreme Operations Protective		SOA1/29/10	6,561.53
Full Circle Communications, Inc		175	13,695.00
HEADSTRONG PHILIPPINES INC.		392	24,658.30
HEADSTRONG PHILIPPINES INC.		395	28,060.20
HEADSTRONG PHILIPPINES INC.		396	18,549.51
HEADSTRONG PHILIPPINES INC.		397	22,287.31
HEADSTRONG PHILIPPINES INC.		398	23,108.71
HEADSTRONG PHILIPPINES INC.		445	18,378.36
HEADSTRONG PHILIPPINES INC.		446	25,957.15
HEADSTRONG PHILIPPINES INC.		447	18,378.36
HEADSTRONG PHILIPPINES INC.		448	11,730.64
HEADSTRONG PHILIPPINES INC.		449	9,706.20
HEADSTRONG PHILIPPINES INC.		469	15,667.08
HEWLETT-PACKARD PHILIPPINES		R1FI060172A	146,807.28
I-2 INDUSTRIES		10002015	79,164.00
MAXICARE HEALTHCARE CORP		C017631080018	3,277.66
MAXICARE HEALTHCARE CORP		C017631080021	715.02
PRIMOVER CONSULTANCY SERVICES,		3546	2,628.57
REUTERS LIMITED		10-000198	139,441.61
REUTERS LIMITED		PH01167-010	694.75
Sergio D. Gacias Jr		D-0006	494.85
SGV & CO.		ITR PREPARATION	2,160.00
SMART COMMUNICATIONS, INC		13223408	472.42
TEAM ALLIED		538947	1,547.00
TEAM ALLIED		539439	7,893.85
Sub-total			***3,527,052.60***
4 Domestic purchases of goods other than capital goods without supporting VAT invoice			
CHEQ SYSTEMS, INC.		1942	348,000.00
CHEQ SYSTEMS, INC.		SOA 2010-22	1,653.12
CITIMEX, INC.		28748	117,120.00
CONTRADE ENTERPRISES, INC.		2	88,936.40
CONTRADE ENTERPRISES, INC.		3	57,242.23
CONTRADE ENTERPRISES, INC.		4	2,017.35
DATACRAFT PHILIPPINES INC.		7710006517/6402	436,189.00
ESCO Audio Visual Pte.Ltd.		ESI29529	1,710.00
FACILITIES MANAGERS,INC.		90564	300.64
FACILITIES MANAGERS,INC.		90567	599.83
FUJI XEROX PHILIPPINES INC		336665	107.14
JJED PHILIPPINES INC		81420	1,682.37
MERCURY DRUG CORPORATION		28367550	1,659.70
MERCURY DRUG CORPORATION		28367951	1,144.93
MERCURY DRUG CORPORATION		28367952	1,862.97
MERCURY DRUG CORPORATION		28367993	586.61
Papertech Inc.		205694	8,775.00
Papertech Inc.		206934	19,504.26
Papertech Inc.		208983	4,834.27

Findings	Exhibit No.	Invoice Number	Input VAT Amount
Papertech Inc.		208984	514.29
PHILIPPINE VENDING CORPORATION		63560	9,477.38
PHILIPPINE VENDING CORPORATION		76117	3,507.05
PHILIPPINE VENDING CORPORATION		78371	9,959.91
QUARTZ BUSINESS PRODUCTS CORP		411203	980.36
RICHMARK TRADE DEVELOPMENT		30951	261.37
RICHMARK TRADE DEVELOPMENT		31057	262.45
SHELLSOFT TECHNOLOGY CORPORATION		3506	9,428.57
SKY COMPUTER AND OFFICE SUPPLIES		183879	349.93
SKY COMPUTER AND OFFICE SUPPLIES		184078	93.21
SKY COMPUTER AND OFFICE SUPPLIES		191579	2,421.43
SKY COMPUTER AND OFFICE SUPPLIES		191580	1,987.50
SKY COMPUTER AND OFFICE SUPPLIES		192005	85.71
SKY COMPUTER AND OFFICE SUPPLIES		194098	285.00
SKY COMPUTER AND OFFICE SUPPLIES		194543	2,046.86
Sub-total			***1,135,586.84***
5 Domestic purchases of capital goods not exceeding P1M supported by VAT invoices dated outside the period of claim			
ACCENT MICRO TECHNOLOGIES INC	M-718	107223	804.43
ACCENT MICRO TECHNOLOGIES INC	M-719	107431	1,178.57
ACCENT MICRO TECHNOLOGIES INC	M-720	107455	1,232.14
ACCENT MICRO TECHNOLOGIES INC	M-721	107590	2,415.00
ACCENT MICRO TECHNOLOGIES INC	M-722	107591	966.00
Sub-total			***6,596.14***
6 Domestic purchase of services supported by VAT OR dated outside the period of claim			
ASCOTT MAKATI INC.	M-741	3304000I1420	3,235.68
Sub-total			***3,235.68***
7 Overclaimed input VAT on domestic purchases of service supported by VAT OR			
AUTOHOME BUSINESS SOLUTIONS, INC	M-766	733	4,086.21
AUTOHOME BUSINESS SOLUTIONS, INC	M-767	734	3,494.12
BUSINESSWORKS, INC.	M-827	2642	4,591.83
BUSINESSWORKS, INC.	M-828	2643	7,755.10
CAREER MANAGEMENT CONSULTING	M-833	153	2,630.73
CAREER MANAGEMENT CONSULTING	M-834	154	1,545.82
CAREER MANAGEMENT CONSULTING	M-835	156	1,786.80
CAREER MANAGEMENT CONSULTING	M-836	157	2,208.00
CAREER MANAGEMENT CONSULTING	M-837	158	1,772.64
DHL EXPRESS PHILS CORP	M-992	D01451882	16,592.49
DHL EXPRESS PHILS CORP	M-994	D01464220	3,082.93
DHL EXPRESS PHILS CORP	M-995	D01469723A	702.44
DHL EXPRESS PHILS CORP	M-998	D01472693A	436.00
FACILITIES MANAGERS,INC.	M-1138	90825	272.63
FUJI XEROX PHILIPPINES INC	M-1165	144400 to 144402	2,406.27
FUJI XEROX PHILIPPINES INC	M-1166	144536 to 144539	2,853.36
HOSPITALITY INTERNATIONAL, INC	M-1674	02-03/10	581.69
LEAVES & BRANCHES ENTERPRISES	M-1810	5607	8,090.62
LEAVES & BRANCHES ENTERPRISES	M-1811	5714	12,365.44
LEAVES & BRANCHES ENTERPRISES	M-1812	5865	8,090.62
LJ SYNERGY INCORPORATED	M-1813	419	160.57

Findings	Exhibit No.	Invoice Number	Input VAT Amount
LJ SYNERGY INCORPORATED	M-1814	428	160.57
NO KA OI (PHILS) INT'L, INC.	M-1854	24661/24663	125.06
NO KA OI (PHILS) INT'L, INC.	M-1855	24662	50.22
NO KA OI (PHILS) INT'L, INC.	M-1857	24820	75.71
ORACLE PHILIPPINES CORP.	M-1858	3013460/3013503/3013566	508.67
ORACLE PHILIPPINES CORP.	M-1859	SOA 02.03.2010	2,097.82
VIVENTIS SEARCH ASIA, INC.	M-2242	2634	900.00
Sub-total			***89,424.36***
8 Input VAT on services rendered by non-residents without supporting documents			
FIRST ADVANTAGE AUSTRALIA		48887	23,051.32
FIRST ADVANTAGE AUSTRALIA		48888	5,674.70
HDAP SINGAPORE PTE LTD		HDAP/017/JAN10	69,151.33
Sub-total			**97,877.35**
9 Input VAT on services supported by documents imprinted with the statement "This document is not a valid source of input tax"			
PLDT	M-1869	28754740	239.40
PLDT	M-1870	20473026	239.40
PLDT	M-1870	20861146	(691.31)
PLDT	M-1870	20025516	239.40
PLDT	M-1870	30572330	(533.90)
PLDT	M-1870	16712142	239.40
PLDT	M-1870	17272404	239.40
PLDT	M-1870	22776257	239.40
PLDT	M-1870	23390443	239.40
PLDT	M-1870	24354603	436.17
PLDT	M-1870	25497762	239.40
PLDT	M-1870	28754619	160.71
PLDT	M-1870	28754651	239.40
PLDT	M-1871	20861106	(181.85)
PLDT	M-1871	20025476	160.71
PLDT	M-1871	17786932	160.71
PLDT	M-1875	20473075	239.40
PLDT	M-1875	23390444	239.40
PLDT	M-1875	26965015	(333.85)
PLDT	M-1875	20025567	239.40
PLDT	M-1877	20473074	239.40
PLDT	M-1881	26070304	104.26
PLDT	M-1881	25497738	239.40
PLDT	M-1881	24354579	239.40
PLDT	M-1881	23958743	239.40
PLDT	M-1881	19492037	239.40
PLDT	M-1881	16189586	239.40
PLDT	M-1884	24354585	43,261.60
PLDT	M-1885	28754739	(39.35)
PLDT	M-1885	26070328	239.40
PLDT	M-1885	26965038	239.40
PLDT	M-1885	27602758	239.40
PLDT	M-1885	15823402	436.17
PLDT	M-1885	16479824	239.40

Findings	Exhibit No.	Invoice Number	Input VAT Amount
PLDT	M-1887	25497744	188,340.22
PLDT	M-1890	26070310	201,497.13
PLDT	M-1892	26070331	628.35
PLDT	M-1892	28754742	(31.48)
PLDT	M-1894	26965020	75,524.43
PLDT	M-1895	28754724	(47.23)
PLDT	M-1895	26965026	239.40
PLDT	M-1897	27602761	239.40
PLDT	M-1901	28754727	239.40
PLDT	M-1905	29032067	19,980.00
PLDT	M-1908	29363213	239.40
PLDT	M-1910	29363241	239.40
PLDT	M-1911	29363242	239.40
PLDT	M-1912	29363243	239.40
PLDT	M-1913	29363244	239.40
PLDT	M-1915	29363247	160.71
PLDT	M-1916	29363256	239.40
PLDT	M-1918	29363260	239.40
PLDT	M-1919	29363261	239.40
PLDT	M-1920	29363263	239.40
PLDT	M-1921	29363264	239.40
PLDT	M-1922	29363265	239.40
PLDT	M-1923	29363266	239.40
PLDT	M-1924	29363269	239.40
PLDT	M-1925	29363273	160.71
PLDT	M-1926	29363279	389.38
PLDT	M-1929	29363283	69,431.94
PLDT	M-1930	29363285	239.40
PLDT	M-1931	29363286	239.40
PLDT	M-1932	29363288	239.40
PLDT	M-1934	29363291	239.40
PLDT	M-1935	29363292	239.40
PLDT	M-1936	29363293	239.40
PLDT	M-1937	29363296	160.71
PLDT	M-1938	29363298	239.40
PLDT	M-1939	29363299	239.40
PLDT	M-1941	29363302	239.40
PLDT	M-1942	29363303	160.71
PLDT	M-1943	29363304	160.71
PLDT	M-1944	29363305	6,190.50
PLDT	M-1945	29363309	217.68
PLDT	M-1946	29363311	160.71
PLDT	M-1948	29363314	239.40
PLDT	M-1949	29363315	239.40
PLDT	M-1950	29363318	239.40
PLDT	M-1951	29363322	239.40
PLDT	M-1952	29363323	239.40
PLDT	M-1953	29363325	217.68
PLDT	M-1954	29363326	217.68

Findings	Exhibit No.	Invoice Number	Input VAT Amount
PLDT	M-1955	29363327	77,612.55
PLDT	M-1956	29363328	239.40
PLDT	M-1957	29363330	239.40
PLDT	M-1958	29363331	239.40
PLDT	M-1959	29363332	239.40
PLDT	M-1960	29363333	239.40
PLDT	M-1961	29363334	239.40
PLDT	M-1962	29363335	239.40
PLDT	M-1963	29363336	239.40
PLDT	M-1964	29363337	239.40
PLDT	M-1965	29363338	239.40
PLDT	M-1966	29363339	239.40
PLDT	M-1967	29363340	239.40
PLDT	M-1968	29363341	239.40
PLDT	M-1969	29363342	239.40
PLDT	M-1970	29363344	239.40
PLDT	M-1971	29363349	239.40
PLDT	M-1973	29958718	428.59
PLDT	M-1974	29958720	239.40
PLDT	M-1975	29958731	160.71
PLDT	M-1976	29958748	239.40
PLDT	M-1977	29958749	239.40
PLDT	M-1978	29958750	239.40
PLDT	M-1979	29958751	239.40
PLDT	M-1980	29958752	239.40
PLDT	M-1981	29958754	160.71
PLDT	M-1982	29958763	239.40
PLDT	M-1983	29958764	239.40
PLDT	M-1984	29958767	239.40
PLDT	M-1985	29958768	239.40
PLDT	M-1986	29958770	239.40
PLDT	M-1987	29958771	239.40
PLDT	M-1988	29958772	239.40
PLDT	M-1989	29958773	239.40
PLDT	M-1990	29958776	239.40
PLDT	M-1991	29958780	160.71
PLDT	M-1992	29958786	389.38
PLDT	M-1993	29958787	389.38
PLDT	M-1994	29958788	389.38
PLDT	M-1995	29958790	71,807.19
PLDT	M-1996	29958792	239.40
PLDT	M-1997	29958793	239.40
PLDT	M-1998	29958795	239.40
PLDT	M-1999	29958796	239.40
PLDT	M-2000	29958798	239.40
PLDT	M-2001	29958799	239.40
PLDT	M-2002	29958800	239.40
PLDT	M-2003	29958803	160.71
PLDT	M-2004	29958805	239.40

Findings	Exhibit No.	Invoice Number	Input VAT Amount
PLDT	M-2005	29958806	239.40
PLDT	M-2006	29958808	239.40
PLDT	M-2007	29958809	239.40
PLDT	M-2008	29958810	160.71
PLDT	M-2009	29958811	160.71
PLDT	M-2010	29958812	6,123.84
PLDT	M-2011	29958816	217.68
PLDT	M-2012	29958818	160.71
PLDT	M-2013	29958820	6,120.00
PLDT	M-2014	29958821	239.40
PLDT	M-2015	29958825	239.40
PLDT	M-2016	29958829	239.40
PLDT	M-2017	29958830	239.40
PLDT	M-2018	29958832	217.68
PLDT	M-2019	29958833	217.68
PLDT	M-2020	29958834	79,450.92
PLDT	M-2021	29958835	239.40
PLDT	M-2022	29958837	239.40
PLDT	M-2023	29958838	239.40
PLDT	M-2024	29958839	239.40
PLDT	M-2025	29958840	239.40
PLDT	M-2026	29958841	239.40
PLDT	M-2027	29958842	239.40
PLDT	M-2028	29958843	239.40
PLDT	M-2029	29958844	239.40
PLDT	M-2030	29958846	239.40
PLDT	M-2031	29958847	239.40
PLDT	M-2032	29958848	239.40
PLDT	M-2033	29958849	239.40
PLDT	M-2034	29958856	239.40
PLDT	M-2035	30232176	19,980.00
PLDT	M-2036	30572326	368.59
PLDT	M-2037	30572327	27,000.00
PLDT	M-2038	30572328	24,480.00
PLDT	M-2039	30572341	160.71
PLDT	M-2040	30572358	239.40
PLDT	M-2041	30572359	239.40
PLDT	M-2042	30572361	239.40
PLDT	M-2043	30572362	239.40
PLDT	M-2044	30572373	239.40
PLDT	M-2045	30572377	239.40
PLDT	M-2046	30572378	239.40
PLDT	M-2047	30572380	239.40
PLDT	M-2048	30572381	239.40
PLDT	M-2049	30572382	239.40
PLDT	M-2050	30572383	239.40
PLDT	M-2051	30572386	239.40
PLDT	M-2052	30572390	160.71
PLDT	M-2053	30572397	389.38

Findings	Exhibit No.	Invoice Number	Input VAT Amount
PLDT	M-2054	30572398	389.38
PLDT	M-2055	30572400	74,611.44
PLDT	M-2056	30572403	239.40
PLDT	M-2057	30572406	239.40
PLDT	M-2058	30572408	239.40
PLDT	M-2059	30572409	239.40
PLDT	M-2060	30572410	239.40
PLDT	M-2061	30572413	160.71
PLDT	M-2062	30572415	239.40
PLDT	M-2063	30572416	239.40
PLDT	M-2064	30572418	239.40
PLDT	M-2065	30572419	239.40
PLDT	M-2066	30572420	160.71
PLDT	M-2067	30572421	160.71
PLDT	M-2068	30572426	217.68
PLDT	M-2069	30572431	239.40
PLDT	M-2070	30572435	239.40
PLDT	M-2071	30572439	239.40
PLDT	M-2072	30572440	239.40
PLDT	M-2073	30572443	217.68
PLDT	M-2074	30572444	99,300.53
PLDT	M-2075	30572445	239.40
PLDT	M-2076	30572447	239.40
PLDT	M-2077	30572448	239.40
PLDT	M-2078	30572449	239.40
PLDT	M-2079	30572450	239.40
PLDT	M-2080	30572451	239.40
PLDT	M-2081	30572452	239.40
PLDT	M-2082	30572454	239.40
PLDT	M-2083	30572455	239.40
PLDT	M-2084	30572456	239.40
PLDT	M-2085	30572457	239.40
PLDT	M-2086	30572458	239.40
PLDT	M-2087	30572459	239.40
PLDT	M-2088	30572461	239.40
PLDT	M-2089	30572466	239.40
PLDT	M-2090	31044868	19,980.00
Sub-total			***1,155,076.88***
Grand Total			**11,556,290.62**