REPUBLIC OF THE PHILIPPINES
COURT OF TAX APPEALS
QUEZON CITY

BENGUET CORPORATION,
Petitioner,

- versus -

C.T.A. CASE NO. 5934

THE COMMISSIONER OF INTERNAL REVENUE and THE COMMISSIONER OF CUSTOMS,
Respondents.

Promulgated:

JAN 25 2002

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DECISION

Before Us is a Petition for Review filed on September 29, 1999 claiming for the refund or issuance of a tax credit certificate in the aggregate amount of P16,185,725.99, allegedly representing the excess net creditable VAT input for the third and fourth quarters ended September 30, 1997 and December 31, 1997, respectively.

Petitioner is a domestic corporation duly organized and existing under Philippine laws with principal office located at One Corporate Plaza, 845 Arnaiz Avenue, 1223 Makati City. It is primarily engaged in the mining business, which includes the exploration, development and operation of mining properties for purposes of commercial production, and also the marketing of marketable mine products. It is likewise registered with the BIR as a Value-Added Tax (VAT) taxpayer in accordance with Section 107 of the old Tax Code (now Section 236 par. H of the 1997 Tax Code) as evidenced by a VAT Registration Certificate No. 94-410-002700 wherein it has been issued Registration/Tax

Identification Number 410-000-051-037 VAT on the sale of its goods effective June 30, 1994 (see Annex A, Petition for Review).

On May 4, 1988, Petitioner filed with the BIR an Application for Zero Rate on Sale of its goods to persons or entities.

On October 20, 1997, Petitioner filed with the BIR its third quarter VAT Return for the period ended September 30, 1997 (Exhibit "A"), reflecting a total creditable VAT input of P30,539,755.22 of which P13,088,027.83 was generated from its domestic purchases of goods and services and importation of goods for the said quarter, computed as follows:

	VAT INPUT TAX
Carried over from previous quarter	P17,451,727.39
Domestic purchases of goods and services	10,398,968.89
Importation of goods	2,689,058.94
	P30,539,755.22

(Exhibits A, A-1)

On January 20, 1998, Petitioner filed its fourth quarter VAT Return (Exhibit "C") for the period ended December 31, 1997 with the BIR showing a total creditable VAT input of P34,546,845.61 of which P4,661,448.12 was generated from domestic purchases of goods and services and importation of capital goods for the said quarter, computed as follows:

	VAT INPUT TAX
Carried over from previous quarter	P29,885,397.49
Domestic purchases of goods and services	4,501,492.12
Importation of goods	159,956.00
Total	P34,546,845.61

(Exhibits C, C-1)

On July 1, 1999 and September 3, 1999, Petitioner filed with the Tax and Revenue Group of One-Stop Shop Inter-Agency Tax Credit and Duty Drawback Center of the Department of Finance (DOF), its applications for tax credit/refund of its excess or unapplied net creditable VAT inputs for the third quarter ended September 30, 1997 and fourth quarter ended December 31, 1997, in the amount of P12,592.011.34 and P3,593,714.65, respectively (Exhibit B-1 and Annex F).

Since the aforementioned claims for refund in the aggregate amount of P16,185,725.99 was not acted upon by the Respondent and in order to preserve its right to judicially claim the same, Petitioner filed its appeal before this Court by way of Petition for Review on September 29, 1999.

In his Answer, Respondent Commissioner of Customs raised the following Special and Affirmative Defenses, to wit:

> "4. The petition states no cause of action as it does not allege the dates when the taxes sought to be refunded were actually paid (**Manufacturer's Bank and Trust Co., etc. vs. Commissioner of Internal Revenue, Ledesma, 31 SCRA 95; Manila Electric Co. vs. Commissioner of Internal Revenue, 67 SCRA 35**);
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> 5. It is incumbent upon Petitioner to show compliance with the provision of Section 230 of the Tax Code, as amended;
>
> 6. Claims for refund are construed strictly against the claimant for the same partakes of the nature of an exemption from taxation (**Commissioner of Internal Revenue vs. Ledesma, 31 SCRA 95**);
>
> 7. Taxation is one of the inherent powers of the state and taxes are considered the lifeblood of the nation. Hence, the burden is upon the taxpayer to prove that he actually paid the taxes in question and that he is entitled to the refund sought, and failure to do so, is fatal to the action for refund."

Moreover, Respondent Commissioner of Internal Revenue, in his Answer, raised the following Special and Affirmative Defenses, thus:

"5. Petition states no cause of action as it does not allege the dates when the taxes sought to be refunded were actually paid;

6. Pursuant to Section 112(D) of the National Internal Revenue Code, the Commissioner shall grant a refund or issue the tax credit certificate for creditable input taxes within 120 days from the date of submission of complete documents in support of the application filed and not 60 days as alleged by Petitioner;

7. It is incumbent upon herein Petitioner to show that it has complied with the provision of Section 229 of the Tax Code;

8. Claims for refund are construed strictly against the claimant, the same being in the nature of exemption from taxes (**Commissioner of Internal Revenue vs. Ledesma, 31 SCRA 95; Manila Electric Co. vs. Commissioner of Internal Revenue, 67 SCRA 35**);

9. One who claims to be exempt from payment of a particular tax must do so under clear and unmistakable terms found in the statute (**Asiatic Petroleum vs. Llanes, 49 Phil 466; Union Garment Co. vs. Court of Tax Appeals, 4 SCRA 304**);

10. In (sic) action for refund, the burden is upon the taxpayer to prove that he is entitled thereto, and failure to sustain the same is fatal to the action for tax refund."

In the Joint Stipulation of Facts and Restatement of Issues which was concluded between Petitioner and Respondent Commissioner of Internal Revenue, the following issues were agreed upon:

"(a) Whether or not Petitioner has unutilized creditable VAT inputs for the period July 1, 1997 to December 31, 1997 in the aggregate amount of P16,185,725.99 arising from its domestic purchases of goods and services, and importation of capital goods which is a proper subject of a claim for refund pursuant to Section 112 of the National Internal Revenue Code (Tax Code), as amended;

(b) Whether or not the said creditable VAT inputs of the Petitioner for the period July 1, 1997 to December 31, 1997 are substantiated by documentary evidence in the form of invoices, official receipts and other acceptable supporting documents; and

(c) Whether or not said unutilized creditable VAT inputs of the Petitioner for the period July 1, 1997 to December 31, 1997 was carried forward to the succeeding taxable quarter and applied against any output VAT of the Petitioner for the said period.

We rule in favor of Petitioner.

The instant case is not one of first impression. Quoted hereunder are the pertinent provisions of the 1997 Tax Code on the refund of excess input VAT paid on domestic purchases of goods and services and from importation of capital goods attributable to zero-rated or effectively zero-rated sales, thus:

> ***"Section 100. Value Added Tax on sale of goods or properties.- (a) Rate and Base of Tax.-*** There shall be levied, assessed and collected on every sale, barter or exchange of goods or properties, a value-added tax equivalent to 10% of the gross selling price or gross value in money of the goods or properties sold, bartered or exchanged, such tax to be paid by the seller or transferor.
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> x x x x x x
>
> (2) The following sales by VAT-registered persons shall be subject to 0%:
>
> (A) Export Sales.- The term "export sales" means:
>
> "(i) The sale and actual shipment of goods from the Philippines to a foreign country, irrespective of any shipping arrangement that may be agreed upon which may influence or determine the transfer of ownership of the goods so exported and paid for in acceptable foreign currency or its equivalent in goods or services, and accounted for in accordance with the rules and regulations of the *Bangko Sentral ng Pilipinas* (BSP)."
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> ***"Section 106. Refunds or Tax credits of creditable input tax.*** – (a) 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 100(a)(2)(A)(i), (ii) and (b) and Section 102 (b)(1) and (2), the acceptable foreign currency exchange proceeds thereof had been duly accounted for in accordance with the regulations of the *Bangko Sentral ng Pilipinas* (BSP): *x x x*."

(b) Capital Goods. - A VAT-registered person may apply for the issuance of a tax credit certificate or refund of input taxes paid on capital goods imported or locally purchased, to the extent that such input taxes have not been applied against output taxes. The application may be made only within two (2) years after the close of the taxable quarter when the importation or purchase was made."

In sum, the following basic requisites must be complied with in order for tax refunds or credits of excess input VAT paid may be granted as provided in Section 100(a)(2)(A)(i) of the 1997 Tax Code, thus:

1. That there be a sale of goods;

2. That the sale be made by a VAT-registered person;

3. That the sale qualifies as export sale as defined by law;

4. That the foreign exchange proceeds of said export sales were properly accounted for in accordance with the rules and regulations of the *Bangko Sentral ng Pilipinas*.

On the other hand, Section 106(a) and (b) of the 1997 Tax Code specifically provides for the following requisites before a claim for refund can be granted, thus:

1. That the application of a tax credit or refund has been made within the two-year prescriptive period from the filing of the quarterly VAT return as provided under Section 4.106-2(c) of Revenue Regulations No. 2-95;

2. That the claimed input taxes on domestic purchases of taxable goods and services are directly attributable to its zero-rated sales;

3. That the claimed input taxes were not offset/applied against any output tax nor carried over to the succeeding months/quarter.

It is undisputed that Petitioner is a VAT-registered entity. (par. 4, Joint Stipulation of Facts, CTA Records, p. 54). Records reveal that Petitioner actually generated export sales and the foreign currency exchange proceeds thereof were inwardly remitted in accordance with the rules and regulations of the Bangko Sentral ng Pilipinas (BSP). This is evidenced by the various export sales invoices, export declarations, airway bills, bills of lading, bank credit/memo(s) and official receipts which have been pre-marked by the independent CPA (Exhibit E).

Considering that Petitioner's export sales qualify as zero-rated, it is not liable to pay the output tax due thereon. Petitioner's right to refund or credit the input VAT paid on its purchases of goods, properties or services related to such zero-rated sales is provided under Section 4.102 of Revenue Regulations No. 7-95 in relation to Section 106(a) of the 1997 Tax Code. Moreover, the right to refund or credit the input tax paid is likewise applicable on its importation of capital goods as sanctioned by Section 106(b) of the same code.

With regard to the timeliness of Petitioner's action both in the administrative and judicial levels, this Court finds that prescription had not yet set in. Records reveal that Petitioner filed its 1997 third and fourth quarterly VAT returns on October 20, 1997 and January 20, 1998, respectively. The administrative claims were filed on July 1, 1999 and September 3, 1999 for the third and fourth quarterly VAT returns, respectively, while the Petition for Review was filed on September 29, 1999. Hence, both the administrative and judicial claims were filed within the two-year prescriptive period provided under Section

4.106-2(C) of Revenue Regulations No. 7-95. The said regulation provides that the application for the refund or credit of input taxes paid on capital goods imported or locally purchased shall be made within two years after the close of the taxable quarter when the importation or purchase was made.

Petitioner declared the following in its third and fourth quarterly VAT returns for the year 1997, to wit:

QTR. INVOLVED	EXHIBIT	ZERO-RATED SALES	DOMESTIC PURCHASES	IMPORTATIONS	INPUT VAT
3RD QTR.	A/A-1	P261,926,296.66	P103,989,688.90	P26,890,589.40	P13,088,027.83
4TH QTR.	C/C-1	169,296,479.55	45,014,921.20	1,599,560.00	4,661,448.12
TOTAL		P431,222,776.21	P149,004,610.10	P28,490,149.40	P17,749,475.95

Petitioner's applications for credit/refund of value added tax paid, declared the amounts of P12,592,011.34 (Exhibit B-1) and P3,593,714.65 (Annex F) for the third and fourth quarters, respectively, as input taxes being claimed for an aggregate amount of P16,185,725.99. However, the total claim for refund as declared in Petitioner's third and fourth quarterly VAT returns is P17,749,475.95.

Upon examination of Petitioner's 1997 third and fourth quarterly VAT returns (Exhibits A and C), the Court finds that the claimed input taxes were already net of Petitioner's output tax liabilities for the same quarters. Thus, the claimed input taxes on its purchases of taxable goods and services are directly attributable to its zero-rated sales.

Records, likewise, reveal that the unutilized input taxes for the third and fourth quarters were carried-over up to the third quarter of taxable year 1998 (Exhibit D-5) but were nevertheless deducted from the total available input taxes for the fourth quarterly VAT of 1998 (Line 27, Exhibit D-6, CTA Records, p. 134).

Due to the voluminous nature of the evidence presented, Petitioner engaged the services of an independent accounting firm to conduct an audit and evaluation of the documents pertinent to the input VAT claimed for the period. The findings of the independent CPA, is thus, summarized as follows:

(a) Sales amounting to P213,967.63 were not supported by sales invoices. Hence, the corresponding output tax of P21,396.76 was deducted from Petitioner's claim for refund.

(b) Input taxes amounting to P1,141,046.41 were disallowed for non-compliance with the VAT invoicing requirements.

(c) No exception was noted for Petitioner's inward remittances.

Based on the findings of the independent CPA, Petitioner's claim was reduced to P15,023,282.78 (mentioned as Exhibit A in Exhibit E page 140, CTA Records). The Court finds the independent CPA's report to be in order.

Upon further verification by the Court, the pre-marked documents presented in evidence resulted to an additional input VAT disallowance of P1,491,612.56 due to the following reasons:

(a) Not supported by official receipts/invoices but by statement of account, account summary, statement of freight charges or debit note.

SUPPLIER	QTR. INVOLVED	ACCOUNT NO.	DATE	REFERENCE NO.		INVOICE AMOUNT		INPUT VAT
ARROW FREIGHT CORP.	3RD QTR	AC 1701	5/29/97	16598	P	33,558.00	P	3,050.73
ARROW FREIGHT CORP.	3RD QTR	AC 1701	5/31/97	16616		21,856.00		1,986.91
ARROW FREIGHT CORP.	3RD QTR	AC 1701	5/31/97	16620		21,856.00		1,986.91
ARROW FREIGHT CORP.	3RD QTR	AC 1701	6/16/97	16646		10,933.00		993.91
ARROW FREIGHT CORP.	3RD QTR	AC 1701	6/28/97	16678		8,550.32		777.30
ARROW FREIGHT CORP.	3RD QTR	AC 1701	7/14/97	16703		8,392.00		762.91
ARROW FREIGHT CORP.	3RD QTR	AC 1701	7/17/97	16724		8,392.00		762.91
ARROW FREIGHT CORP.	3RD QTR	AC 1701	7/23/97	16737		8,392.00		762.91
ARROW FREIGHT CORP.	3RD QTR	AC 1701	7/30/97	16751		8,392.00		762.91
ARROW FREIGHT CORP.	3RD QTR	AC 0450	5/29/97	16595		10,196.00		926.91
ARROW FREIGHT CORP.	3RD QTR	AC 0450	5/29/97	16596		42,215.00		3,837.73

ARROW FREIGHT CORP.	3RD QTR	AC 0450	5/29/97	16597	288.71	26.25
ARROW FREIGHT CORP.	3RD QTR	AC 0450	5/31/97	16615	3,376.00	306.91
ARROW FREIGHT CORP.	3RD QTR	AC 0450	5/31/97	16619	10,196.00	926.91
ARROW FREIGHT CORP.	3RD QTR	AC 0450	5/31/97	16633	5,113.00	464.82
ARROW FREIGHT CORP.	3RD QTR	AC 0450	5/31/97	16636	1,127.60	102.51
ARROW FREIGHT CORP.	3RD QTR	AC 0450	5/31/97	16640	5,103.00	463.91
ARROW FREIGHT CORP.	3RD QTR	AC 0450	6/16/97	16643	62,607.00	5,691.55
ARROW FREIGHT CORP.	3RD QTR	AC 0450	6/20/97	16660	31,544.00	2,867.64
ARROW FREIGHT CORP.	3RD QTR	AC 0450	6/28/97	16667	1,935.00	175.90
ARROW FREIGHT CORP.	3RD QTR	AC 0450	6/28/97	16669	26,902.00	2,445.64
ARROW FREIGHT CORP.	3RD QTR	AC 0450	6/30/97	16684	63,501.89	5,772.90
ARROW FREIGHT CORP.	3RD QTR	AC 0450	6/30/97	16695	29,225.00	2,656.82
ARROW FREIGHT CORP.	3RD QTR	AC 0450	7/14/97	16702	15,299.00	1,390.82
ARROW FREIGHT CORP.	3RD QTR	AC 0450	7/17/97	16720	16,235.00	1,475.91
ARROW FREIGHT CORP.	3RD QTR	AC 0450	7/19/97	16729	2,743.50	249.41
ARROW FREIGHT CORP.	3RD QTR	AC 0450	7/23/97	16734	14,762.10	1,342.01
ARROW FREIGHT CORP.	3RD QTR	AC 0450	7/23/97	16735	8,469.00	769.91
ARROW FREIGHT CORP.	3RD QTR	AC 0450	7/23/97	16742	18,103.00	1,645.73
ARROW FREIGHT CORP.	3RD QTR	AC 0450	7/30/97	16753	20,392.00	1,853.82
ARROW FREIGHT CORP.	3RD QTR	AC 0450	7/31/97	16765	5,467.00	497.00
ARROW FREIGHT CORP.	3RD QTR	AC 0450	7/31/97	16771	10,196.00	926.91
ARROW FREIGHT CORP.	3RD QTR	AC 0261	5/29/97	16594	8,252.56	750.23
ARROW FREIGHT CORP.	3RD QTR	AC 0261	5/31/97	16627	19,134.50	1,739.50
ARROW FREIGHT CORP.	3RD QTR	AC 0261	6/16/97	16644	8,090.38	735.49
ARROW FREIGHT CORP.	3RD QTR	AC 0261	6/16/97	16650	26,400.00	2,400.00
ARROW FREIGHT CORP.	3RD QTR	AC 0261	6/28/97	16670	8,182.00	743.82
ARROW FREIGHT CORP.	3RD QTR	AC 0261	6/30/97	16683	16,334.00	1,484.91
ARROW FREIGHT CORP.	3RD QTR	AC 0261	6/30/97	16691	16,400.87	1,490.99
ARROW FREIGHT CORP.	3RD QTR	AC 0261	7/14/97	16704	9,569.00	869.91
ARROW FREIGHT CORP.	3RD QTR	AC 0261	7/15/97	16707	3,000.00	272.73
ARROW FREIGHT CORP.	3RD QTR	AC 0261	7/17/97	16721	19,128.00	1,738.91
ARROW FREIGHT CORP.	3RD QTR	AC 0261	7/19/97	16728	16,334.00	1,484.91
ARROW FREIGHT CORP.	3RD QTR	AC 0261	7/23/97	16739	16,334.00	1,484.91
ARROW FREIGHT CORP.	3RD QTR	AC 0261	7/23/97	16743	16,344.00	1,485.82
ARROW FREIGHT CORP.	3RD QTR	AC 0261	7/29/97	16748	4,200.00	381.82
ARROW FREIGHT CORP.	3RD QTR	AC 0261	7/30/97	16754	32,678.00	2,970.73
ARROW FREIGHT CORP.	3RD QTR	AC 0261	7/31/97	16759	26,400.00	2,400.00
ARROW FREIGHT CORP.	3RD QTR	AC 0261	7/31/97	16766	19,128.00	1,738.91
ARROW FREIGHT CORP.	3RD QTR	AC 0633	74/18/97	16500	30.00	2.73
ARROW FREIGHT CORP.	3RD QTR	AC 0633	5/29/97	16593	144.72	13.16
ARROW FREIGHT CORP.	3RD QTR	AC 0633	5/29/97	16599	17,390.00	1,580.91
ARROW FREIGHT CORP.	3RD QTR	AC 0633	5/19/97	16629	17,390.00	1,580.91
ARROW FREIGHT CORP.	3RD QTR	AC 0633	6/16/97	16645	91.62	8.33
ARROW FREIGHT CORP.	3RD QTR	AC 0633	6/20/97	16658	40,000.00	3,636.36
ARROW FREIGHT CORP.	3RD QTR	AC 0633	6/20/97	16659	30,000.00	2,727.27
ARROW FREIGHT CORP.	3RD QTR	AC 0633	7/31/97	16770	66.87	6.08
ARROW FREIGHT CORP.	3RD QTR	AC 0633	7/31/97	16773	17,390.00	1,580.91
AYALA BAIN INSURANCE	3RD QTR	AC 1701	7/17/97	103790	266.09	24.19
AYALA BAIN INSURANCE	3RD QTR	AC 1701	7/17/97	103792	88.00	8.00
AYALA BAIN INSURANCE	3RD QTR	AC 1701	7/17/97	103798	568.48	51.68
AYALA BAIN INSURANCE	3RD QTR	AC 1701	7/17/97	103812	122.87	11.17
AYALA BAIN INSURANCE	3RD QTR	AC 1701	7/17/97	103818	184.91	16.81
AYALA BAIN INSURANCE	3RD QTR	AC 1701	7/18/97	103852	88.00	8.00
AYALA BAIN INSURANCE	3RD QTR	AC 1701	7/18/97	103858	162.58	14.78

AYALA BAIN INSURANCE	3RD QTR	AC 1701	7/18/97	103877		388.41		35.31
AYALA BAIN INSURANCE	3RD QTR	AC 1701	7/21/97	103912		88.00		8.00
AYALA BAIN INSURANCE	3RD QTR	AC 1701	7/21/97	103914		88.00		8.00
AYALA BAIN INSURANCE	3RD QTR	AC 1701	7/21/97	103916		106.15		9.65
AYALA BAIN INSURANCE	3RD QTR	AC 1701	7/21/97	103920		88.00		8.00
AYALA BAIN INSURANCE	3RD QTR	AC 1701	7/22/97	103938		581.57		52.87
AYALA BAIN INSURANCE	3RD QTR	AC 1701	8/25/97	104834		1,947.33		177.03
AYALA BAIN INSURANCE	3RD QTR	AC 0261	6/25/97	435138		24,448.58		2,222.60
AYALA BAIN INSURANCE	3RD QTR	AC 0261	7/10/97	435409		34,606.24		3,146.02
AYALA BAIN INSURANCE	3RD QTR	AC 0261	7/28/97	435723		23,542.05		2,140.19
AYALA BAIN INSURANCE	3RD QTR	AC 0261	9/8/97	1053127		10,297.08		936.10
AYALA BAIN INSURANCE	3RD QTR	AC 0261	9/8/97	1053167		20,847.42		1,895.22
AYALA BAIN INSURANCE	3RD QTR	AC 0261	9/8/97	1037930		88.00		8.00
AYALA BAIN INSURANCE	3RD QTR	AC 0261	9/8/97	0137933		88.00		8.00
AYALA BAIN INSURANCE	3RD QTR	AC 0261	9/8/97	0138606		163.75		14.89
AYALA BAIN INSURANCE	3RD QTR	AC 0261	9/8/97	0138766		88.00		8.00
AYALA BAIN INSURANCE	3RD QTR	AC 0261	9/8/97	0138770		88.00		8.00
AYALA BAIN INSURANCE	3RD QTR	AC 0261	9/8/97	0139290		88.00		8.00
AYALA BAIN INSURANCE	3RD QTR	AC 0261	9/8/97	0139292		88.00		8.00
AYALA BAIN INSURANCE	3RD QTR	AC 0261	9/8/97	0139293		501.85		45.62
AYALA BAIN INSURANCE	3RD QTR	AC 0261	9/8/97	0139294		501.49		45.59
AYALA BAIN INSURANCE	3RD QTR	AC 0261	9/24/97	1060087		31,862.73		2,896.61
AYALA BAIN INSURANCE	3RD QTR	AC 0633	7/17/97	1038206		88.00		8.00
INT'L COMMUNICATION	3RD QTR	AC 0261	7/31/97	561		61,600.00		5,600.00
INT'L COMMUNICATION	3RD QTR	AC 0261	8/31/97	824		61,600.00		5,600.00
INT'L COMMUNICATION	3RD QTR	AC 0633	7/31/97	561		107,599.80		9,781.80
INT'L COMMUNICATION	3RD QTR	AC 0633	8/31/97	824		107,599.80		9,781.80
PHILIPPINE AIRLINES	3RD QTR	AC 0261	8/12/97			7,349.00		668.09
PHILIPPINE AIRLINES	3RD QTR	AC 0261	9/19/97			7,593.00		690.27
PHILIPPINE AIRLINES	3RD QTR	AC 0261	9/22/97			8,288.00		753.45
PILIPINO TELEPHONE	3RD QTR	AC 0261	6/18/97	3552638		1,414.60		128.60
PILIPINO TELEPHONE	3RD QTR	AC 0261	7/18/97	1864017		1,391.50		126.50
PILIPINO TELEPHONE	3RD QTR	AC 0261	8/14/97			1,348.60		122.60
SKYLAND BROKERAGE	3RD QTR	AC 1701	9/1/97	21348		4,601.19		418.29
SYCIP, SALAZAR	3RD QTR	AC 1701	4/30/97	131078		11,250.00		1,022.73
SYCIP, SALAZAR	3RD QTR	AC 1701	4/30/97	131269		156.25		14.20
Subtotal for 3rd quarter					**P**	**1,457,677.96**	**P**	**132,516.23**
ADC GENERAL	4TH QTR	AC 0451	11/7/97	0046	P	400.00	P	363.64
ARTHUR RODRIGUEZ	4TH QTR	AC 0451	10/1/97	0059		2,411.45		219.22
AYALA BAIN INSURANCE	4TH QTR	AC 1701	9/18/97	1057513		228.47		20.77
AYALA BAIN INSURANCE	4TH QTR	AC 1701	9/18/97	1057515		189.64		17.24
AYALA BAIN INSURANCE	4TH QTR	AC 1701	9/18/97	1057516		98.45		8.95
AYALA BAIN INSURANCE	4TH QTR	AC 1701	9/19/97	1057527		361.57		32.87
AYALA BAIN INSURANCE	4TH QTR	AC 1701	9/22/97	1057588		457.16		41.56
AYALA BAIN INSURANCE	4TH QTR	AC 1701	9/22/97	1058567		120.89		10.99
AYALA BAIN INSURANCE	4TH QTR	AC 1701	9/22/97	1058568		413.05		37.55
AYALA BAIN INSURANCE	4TH QTR	AC 1701	9/22/97	1058627		88.00		8.00
AYALA BAIN INSURANCE	4TH QTR	AC 1701	9/22/97	1058647		374.55		34.05
AYALA BAIN INSURANCE	4TH QTR	AC 1701	9/22/97	1058687		88.00		8.00
AYALA BAIN INSURANCE	4TH QTR	AC 1701	9/22/97	1058727		88.00		8.00
AYALA BAIN INSURANCE	4TH QTR	AC 1701	9/22/97	1058747		356.73		32.43
AYALA BAIN INSURANCE	4TH QTR	AC 1701	9/22/97	1058767		461.01		41.91

AYALA BAIN INSURANCE	4TH QTR	AC 1701	9/24/97	1060107	63.80	5.80
CAPITOL PUBLISHING	4TH QTR	AC 0632	7/22/97	10855	32,300.00	2,936.36
INTL COMMUNICATION	4TH QTR	AC 0633	9/30/97	1090	107,599.80	9,781.80
INTL COMMUNICATION	4TH QTR	AC 0633	11/30/97	1633	107,599.80	9,781.80
INTL COMMUNICATION	4TH QTR	AC 0261	9/30/97	1090	57,127.99	5,193.45
INTL COMMUNICATION	4TH QTR	AC 0261	11/31/97	1358	61,600.00	5,600.00
INTL COMMUNICATION	4TH QTR	AC 0261	11/30/97	1633	61,600.00	5,600.00
JOMECA DETECTIVE INV.	4TH QTR	AC 0644	12/17/97	039	76,156.44	6,923.31
JOMECA DETECTIVE INV.	4TH QTR	AC 0644	12/4/97	190	75,277.82	6,843.44
JOMECA DETECTIVE INV.	4TH QTR	AC 0644	11/22/97	189	74,812.88	6,801.17
LIGHT SECURITY	4TH QTR	AC 0644	11/3/97	0429	59,519.52	5,410.87
PHIL-FUJI	4TH QTR	AC 0451	10/17/97	745000	41,483.64	3,771.24
RUBIE INTEL	4TH QTR	AC 0644	12/31/97	341	18,600.00	1,690.91
RUBIE INTEL	4TH QTR	AC 0644	12/15/97	336	18,600.00	1,690.91
RUBIE INTEL	4TH QTR	AC 0644	1/25/97	332	18,600.00	1,690.91
RUBIE INTEL	4TH QTR	AC 0644	1/14/97	328	18,600.00	1,690.91
Subtotal for the 4th quarter					**P 835,678.66**	**P 76,298.06**

(b) Invoices/official receipts not in the name of Benguet Corporation

SUPPLIER	QTR. INVOLVED	ACCOUNT NO.	ACCOUNT DATE	REFERENCE NO.	INVOICE AMOUNT	INPUT VAT
ASCENDING RAY CORP.	3RD QTR	1705	7/11/97	35970	P 200.00	P 18.18
AQUINO ENTERPRISES	3RD QTR	IRISAN	10/16/97	0398	61,700.00	5,609.09
AQUINO ENTERPRISES	3RD QTR	IRISAN	10/30/97	0309	31,700.00	2,881.82
BAGUIO JBL SCHOOL	3RD QTR	IRISAN	9/5/97	1302	1,740.00	158.18
BAGUIO JBL SCHOOL	3RD QTR	IRISAN	8/30/97	1300	1,500.00	136.36
BAGUIO METROPOLITAN	3RD QTR	IRISAN	8/6/97	10761	5,249.00	477.18
BAGUIO METROPOLITAN	3RD QTR	IRISAN	8/6/97	10760	24,456.05	2,223.28
BAGUIO METROPOLITAN	3RD QTR	IRISAN	8/11/97	10793	2,957.60	268.87
BENSO WINNER	3RD QTR	AC 1705	8/28/97	34046	223.65	20.33
BOTICA ZOR	3RD QTR	AC 1705	8/7/97	84147	74.50	6.77
COLORITE	3RD QTR	AC 1705	2/14/97	2739	140.00	12.73
COMML FREIGHT SERVICE	3RD QTR	AC 0450	7/3/97	9896	2,585.00	235.00
CONSOLIDATED INDUS.	3RD QTR	IRISAN	8/12/97	2169	1,200.00	109.09
CONSOLIDATED INDUS.	3RD QTR	IRISAN	8/11/97	2164	600.00	54.55
CONSOLIDATED INDUS.	3RD QTR	IRISAN	9/11/97	2421	1,400.00	127.27
DAIRES TRADING	3RD QTR	AC 1705	8/13/97	22924	190.00	17.27
DAIRES TRADING	3RD QTR	AC 1705	8/6/97	22876	190.00	17.27
DOUBLE HAPPINESS REST.	3RD QTR	AC 1705	7/5/97	26740	43.00	3.91
DOUBLE HAPPINESS REST.	3RD QTR	AC 1705	7/1/97	26761	126.00	11.45
DOUBLE HAPPINESS REST.	3RD QTR	AC 1705	7/3/97	26783	123.00	11.18
DOUBLE HAPPINESS REST.	3RD QTR	AC 1705	7/31/97	27590	147.00	13.36
EUROPA PARTS & ACCES.	3RD QTR	IRISAN	6/29/97	66285	2,374.00	215.82
EUROPA PARTS & ACCES.	3RD QTR	IRISAN	7/22/97	66429	720.00	65.45
EUROPA PARTS & ACCES.	3RD QTR	IRISAN	9/22/97	66949	225.00	20.45
F & B INTL INC.	3RD QTR	AC 1705	1/27/97	33943	95.75	8.70
FARMACIA CASTILLO	3RD QTR	AC 1705	3/2/97	64163	98.00	8.91
FARMACIA CASTILLO	3RD QTR	AC 1705	8/2/97	78053	165.00	15.00
FARMACIA CASTILLO	3RD QTR	AC 1705	8/2/97	78054	100.00	9.09

FARMACIA CASTILLO	3RD QTR	AC 1705	8/8/97	78780	100.00	9.09
FARMACIA CASTILLO	3RD QTR	AC 1705	9/5/97	81674	155.00	14.09
FARMACIA VENTURA	3RD QTR	AC 1705	5/31/97	96343	259.45	23.59
FARMACIA VENTURA	3RD QTR	AC 1705	5/31/97	96341	40.00	3.64
FARMACIA VENTURA	3RD QTR	AC 1705	7/17/97	96847	235.00	21.38
FARMACIA VENTURA	3RD QTR	AC 1705	8/11/97	97189	66.60	6.24
FARMACIA VENTURA	3RD QTR	AC 1705	8/6/97	97120	149.50	13.59
FARMACIA VENTURA	3RD QTR	AC 1705	9/11/97	97184	61.20	5.56
FARMACIA VENTURA	3RD QTR	AC 1705	8/14/97	97232	60.25	5.48
FARMACIA VENTURA	3RD QTR	AC 1705	8/14/97	97266	182.20	16.56
FARMACIA WILMA INC	3RD QTR	AC 1705	8/14/97	347621	397.80	36.16
FXR ENTERPRISES	3RD QTR	AC 1701	7/2/97	291	309,078.96	28,098.09
GABBY & ELLEN REST.	3RD QTR	AC 1705	7/7/97	8443	275.00	25.00
GABBY & ELLEN REST.	3RD QTR	AC 1705	6/28/97	8712	140.00	12.73
GEMINI AUTO SUPPLY	3RD QTR	AC 1705	8/7/97	42497	45.00	4.09
GOLDEN CIRCLE, INC.	3RD QTR	AC 1705	6/30/97	15028	144.88	13.17
HOLIDAYLAND	3RD QTR	AC 1705	6/8/97	11570	262.00	23.82
JANET'S PHARMACY	3RD QTR	AC 1705	7/3/97	30126	99.75	9.07
JANET'S PHARMACY	3RD QTR	AC 1705	7/6/97	30098	210.00	19.09
JANET'S PHARMACY	3RD QTR	AC 1705	6/28/97	30077	100.00	9.09
JANET'S PHARMACY	3RD QTR	AC 1705	6/25/97	30069	350.00	31.82
JANET'S PHARMACY	3RD QTR	AC 1705	8/7/97	30418	25.00	2.27
JANET'S PHARMACY	3RD QTR	AC 1705	8/24/97	30559	615.00	55.91
JV'S AUTO SUPPLY	3RD QTR	AC 1705	8/19/97	12275	400.00	36.36
KONG'S RESTAURANT	3RD QTR	AC 1705	6/20/97	152206	227.00	20.64
LA BOTICA	3RD QTR	AC 1705	7/15/97	236589	135.80	12.35
LASER MKTG	3RD QTR	IRISAN	6/30/97	25269	1,045.00	95.00
LASER MKTG	3RD QTR	IRISAN	7/5/97	25375	99.25	9.02
LASER MKTG	3RD QTR	IRISAN	7/4/97	25362	126.75	11.52
LASER MKTG	3RD QTR	IRISAN	7/8/97	25413	874.50	79.50
LASER MKTG	3RD QTR	IRISAN	7/17/97	25556	208.00	18.91
LASER MKTG	3RD QTR	IRISAN	8/15/97	25949	105.00	9.55
LASER MKTG	3RD QTR	IRISAN	7/29/97	25718	70.00	6.36
LASER MKTG	3RD QTR	IRISAN	9/10/97	26343	420.00	38.18
LRK GEN. MDSE	3RD QTR	IRISAN	7/28/97	301	2,070.00	188.18
LRK GEN. MDSE	3RD QTR	IRISAN	7/12/97	220	1,650.00	150.00
LRK GEN. MDSE	3RD QTR	IRISAN	8/11/97	0314	630.00	57.27
LRK GEN. MDSE	3RD QTR	IRISAN	8/16/97	0368	1,200.00	109.09
MAX RESTAURANT	3RD QTR	AC 1705	7/3/97	143112	432.30	39.30
MERCURY DRUG	3RD QTR	AC 1705	7/26/97	679645	805.50	73.23
MERCURY DRUG	3RD QTR	AC 1705	7/4/97	82145	835.75	75.98
MERCURY DRUG	3RD QTR	AC 1705	7/5/97	82368	235.50	21.41
MERCURY DRUG	3RD QTR	AC 1705	9/2/97	204088	104.85	9.53
MERCURY DRUG	3RD QTR	AC 1705	8/4/97	31914	131.50	1.23
MERCURY DRUG	3RD QTR	AC 1705	8/4/97	1217492	60.25	5.48
MERCURY DRUG	3RD QTR	IRISAN	8/5/97	16242	9,836.00	894.18
MOSA ANGALA ENT.	3RD QTR	AC 1705	8/13/97	20131	2,170.00	197.27
NEW MASINLOC HENRY'S	3RD QTR	AC 1705	7/14/97	93151	276.00	25.09
NEW MASINLOC HENRY'S	3RD QTR	AC 1705	8/13/07	93292	1,000.00	90.91
NEW SOUTH STAR DRUG	3RD QTR	AC 1705	7/15/97	47543	65.05	5.91
PYRAMID HARDWARE	3RD QTR	IRISAN	6/30/97	17468	4,989.80	453.62
PYRAMID HARDWARE	3RD QTR	IRISAN	7/17/97	17637	540.00	49.09
PYRAMID HARDWARE	3RD QTR	IRISAN	7/29/97	17687	8,764.00	796.73
PYRAMID HARDWARE	3RD QTR	IRISAN	8/16/97	17904	1,270.00	115.45

PYRAMID HARDWARE	3RD QTR	IRISAN	9/2/97	17942		1,080.00		98.18
PYRAMID HARDWARE	3RD QTR	IRISAN	8/22/97	17884		180.00		16.36
PYRAMID HARDWARE	3RD QTR	IRISAN	9/5/97	17986		1,960.00		178.18
REDISOL INC.	3RD QTR	IRISAN	7/1/97	4392		5,100.00		463.64
ROSJ MKTG	3RD QTR	IRISAN	7/10/97	2529		600.00		54.55
SAN ANDRES CONCRETE	3RD QTR	AC 1705	8/11/97	16400		1,510.00		137.27
SAN FERNANDO MOTOWN	3RD QTR	AC 1705	8/19/97	26772		127.00		11.55
SAN FERNANDO MOTOWN	3RD QTR	AC 1705	8/20/97	26950		87.00		7.91
SHAKEY'S EDSA	3RD QTR	AC 1705	1/15/97	80544		125.84		11.44
SILAHIS MKTG	3RD QTR	IRISAN	8/15/97	53579		6,500.00		590.91
SM SUPERMARKET	3RD QTR	AC 1705	7/7/97	477903		169.75		15.43
T & J CUSTOMBUILT	3RD QTR	IRISAN	5/5/97	35529		7,150.00		650.00
TCY MACHINERY	3RD QTR	IRISAN	7/8/97	1154		4,750.00		431.82
TCY MACHINERY	3RD QTR	IRISAN	7/17/97	1183		6,000.00		545.45
TCY MACHINERY	3RD QTR	IRISAN	8/5/97	1238		2,400.00		218.18
TCY MACHINERY	3RD QTR	IRISAN	8/21/97	1285		9,460.00		860.00
TCY MACHINERY	3RD QTR	IRISAN	9/13/97	1344		720.00		65.45
TCY MACHINERY	3RD QTR	IRISAN	9/18/97	1366		640.00		58.18
TIONGSON DRUGSTORE	3RD QTR	AC 1705	6/6/97	24338		288.35		26.21
TOP ACE MOTORWORK	3RD QTR	IRISAN	7/1/97	40125		2,383.35		216.67
TOP ACE MOTORWORK	3RD QTR	IRISAN	8/4/97	40205		3,800.00		345.45
TOP ACE MOTORWORK	3RD QTR	IRISAN	8/27/97	40217		1,140.00		103.64
VG COMML II	3RD QTR	AC 1705	9/4/97	19585		50.00		4.55
WAN-WAN RESTAURANT	3RD QTR	AC 1705	7/2/97	[illegible]9		325.00		29.55
Subtotal for the 3rd quarter					**P**	**550,699.23**	**P**	**50,053.00**
ARRIAGA ALUMINUM	4TH QTR	IRISAN	10/28/97	8996	P	7,500.00	P	681.82
ATA AUTO SUPPLY	4TH QTR	AC 1705	10/7/97	212238		1,350.00		122.73
BAGUIO JBL	4TH QTR	IRISAN	10/6/97	1328		600.00		54.55
BENGUET-DIZON CON.	4TH QTR	AC 0452	5/23/97	76004		976.90		88.81
BENSO WINNER CORP.	4TH QTR	AC 1705	11/27/97	38380		281.00		25.55
BLOSSOM'S PHARMACY	4TH QTR	AC 1705	11/2/97	1588		290.00		26.36
BLOSSOM'S PHARMACY	4TH QTR	AC 1705	11/21/97	2957		160.00		14.55
BLOSSOM'S PHARMACY	4TH QTR	AC 1705	10/27/97	1209		735.00		66.82
CITIMOTORS, INC.	4TH QTR	AC 1705	9/6/97	283806		250.00		22.73
CONSOLIDATED INDUS.	4TH QTR	IRISAN	10/7/97	2657		600.00		54.55
CONSOLIDATED INDUS.	4TH QTR	IRISAN	10/18/97	2779		2,000.00		181.82
CONSOLIDATED INDUS.	4TH QTR	IRISAN	11/29/97	3072		1,800.00		163.64
CONSOLIDATED INDUS.	4TH QTR	IRISAN	12/12/97	3225		1,800.00		163.64
DAGUPAN HONEYBEE	4TH QTR	AC 1705	11/30/97	22196		947.75		86.16
DOUBLE HAPPINESS	4TH QTR	AC 1705	1/10/98	32912		130.00		11.82
DY AUTO SUPPLY	4TH QTR	AC 1705	10/17/97	892311		212.00		19.27
EUROPA PARTS	4TH QTR	AC 1705	10/13/97	38049		850.00		77.27
F & B INT'L	4TH QTR	AC 1705	11/5/97	42492		92.50		8.41
FARMACIA ESPERANZA	4TH QTR	AC 0452	10/2/97	100		7,651.00		695.55
FARMACIA ESPERANZA	4TH QTR	AC 0452	10/4/97	8808		57,333.10		5,212.10
FARMACIA ESPERANZA	4TH QTR	AC 0452	12/2/97	8833		10,625.60		965.96
FARMACIA ESPERANZA	4TH QTR	AC 0452	12/2/97	8837		7,208.85		655.35
FARMACIA MANIAGO	4TH QTR	AC 1705	11/2/97	20365		600.00		54.55
FARMACIA VENTURINA	4TH QTR	AC 1705	9/29/87	97787		175.40		15.95
FARMACIA VENTURINA	4TH QTR	AC 1705	10/20/97	97786		170.00		15.45
FARMACIA VENTURINA	4TH QTR	AC 1705	10/3/97	97697		298.65		27.15
GARBES-DIZON SERVITEK	4TH QTR	AC 1705	9/24/97	29400		2,750.00		250.00

GARBES-DIZON SERVITEK	4TH QTR	AC 1705	9/23/97	29373		450.00		40.91
JANET'S PHARMACY	4TH QTR	AC 1705	10/30/97	31130		754.00		68.55
JANET'S PHARMACY	4TH QTR	AC 1705	9/26/97	30854		370.00		33.64
JANET'S PHARMACY	4TH QTR	AC 1705	11/4/97	31059		81.00		7.36
JANET'S PHARMACY	4TH QTR	AC 1705	11/5/97	31064		90.00		8.18
JANET'S PHARMACY	4TH QTR	AC 1705	11/27/97	31322		225.00		20.45
JVS AUTO SUPPLY	4TH QTR	AC 1705	10/22/97	12789		430.00		39.09
KAYANG COMML	4TH QTR	AC 1705	11/28/97	110491		38.00		3.45
KOLORMATE PAINT	4TH QTR	AC 1705	9/12/97	55596		680.00		61.82
MAC-BER AUTO SUPPLY	4TH QTR	AC 1705	10/29/97	35689		224.00		20.36
MAC-BER AUTO SUPPLY	4TH QTR	AC 1705	11/13/97	35927		110.00		10.00
MERCURY DRUG	4TH QTR	AC 1705	10/10/97	33251		66.25		6.02
MERCURY DRUG	4TH QTR	AC 1705	9/27/97	32582		66.75		6.07
MERCURY DRUG	4TH QTR	AC 1705	12/15/97	44676		204.00		18.55
MERCURY DRUG	4TH QTR	AC 1705	10/31/97	24434		108.80		9.89
MUY BIEN FOODS CORP.	4TH QTR	AC 1705	9/22/97	7485		73.25		6.66
SM SUPERMARKET	4TH QTR	AC 1705	11/20/97	497660		113.65		10.33
ST. JOSEPH DRUGSTORE	4TH QTR	AC 1705	11/3/97	330876		121.25		11.02
SUNSHINE LUNCH	4TH QTR	AC 1705	9/30/97	176504		223.00		20.27
SYNERCON ENTRP.	4TH QTR	AC 1705	9/7/97	87206		260.00		23.64
TAMBAL ATBPA	4TH QTR	AC 1705	10/27/97	28057		165.00		15.00
TAMBAL ATBPA	4TH QTR	AC 1705	12/10/97	30720		200.00		18.18
TEXAS MANOK	4TH QTR	AC 1705	11/8/97	89844		105.00		9.54
Subtotal for the 4th quarter					P	**112,546.70**	P	**10,231.54**

(c) Invoices/official receipts without "TIN", "V"/"VAT".

SUPPLIER	QTR. INVOLVED	ACCOUNT NO.	DATE	REFERENCE NO.		INVOICE AMOUNT		INPUT VAT
ACR JANITORIAL	3RD QTR	AC 1701	8/14/97	1864	P	16,206.93	P	1,473.36
ACR JANITORIAL	3RD QTR	AC 1701	9/2/97	1867		5,402.31		491.12
ACR JANITORIAL	3RD QTR	AC 1701	9/2/97	1871		76,952.50		6,995.68
ACR JANITORIAL	3RD QTR	AC 1701	9/2/97	1872		74,916.93		6,810.63
BAGUIO COUNTRY CLUB	3RD QTR	AC 0615	6/30/97	063097		6,233.31		566.66
BAGUIO COUNTRY CLUB	3RD QTR	AC 0615	7/31/97	073197		3,928.22		357.11
BUNTAK MINES	3RD QTR	AC 1705	7/31/97	80		297,369.40		27,033.58
CRIBEN PRINTING	3RD QTR	AC 0645	6/24/97	3440		630.00		57.27
DOLOR HOTEL	3RD QTR	AC 1705	7/3/97	4549		220.00		20.00
DOLOR HOTEL	3RD QTR	AC 1705	7/3/97	4548		220.00		20.00
DOLOR HOTEL	3RD QTR	AC 1705	7/3/97	4550		220.00		20.00
DOLOR HOTEL	3RD QTR	AC 1705	7/3/97	4522		270.00		24.55
FXR ENTERPRISES	3RD QTR	AC 1701	7/2/97	290		40,908.52		3,718.96
FXR ENTERPRISES	3RD QTR	AC 1701	7/2/97	292		34,342.11		3,122.01
FXR ENTERPRISES	3RD QTR	AC 1701	8/19/97	296		25,970.60		2,360.96
FXR ENTERPRISES	3RD QTR	AC 1701	9/11/97	298		13,440.31		1,221.85
FXR ENTERPRISES	3RD QTR	AC 1701	9/20/97	300		105,120.33		9,556.39
FXR ENTERPRISES	3RD QTR	AC 1701	9/20/97	301		24,353.80		2,213.98
MENDOZA BROS. RAD.	3RD QTR	AC 0645	6/10/97	2631		850.00		77.27
PENSIONNE VIRGINIA	3RD QTR	AC 0633	6/30/97	5457		2,250.00		204.55
SUBIC PROTECTORS	3RD QTR	AC 1705	7/15/97	1652		138,974.14		12,634.01
SUBIC PROTECTORS	3RD QTR	AC 1705	8/16/97	1657		138,997.80		12,636.16
SUBIC PROTECTORS	3RD QTR	AC 1705	7/31/97	1654		148,264.32		13,478.57

SUBIC PROTECTORS	3RD QTR	AC 1705	9/1/97	1658		148,264.32		13,478.57
SUBIC PROTECTORS	3RD QTR	AC 1705	9/16/97	1661		138,997.80		12,636.16
Subtotal for the 3rd quarter					P	**1,443,303.65**	P	**131,209.40**
BUNTAK MINES	4TH QTR	AC 1705	Nov-97	081	P	416,751.72	P	37,886.52
CRITERION MKTG	4TH QTR	AC 0632	7/21/97	2843		207,412.60		18,855.78
DAGUPAN AIR PROD.	4TH QTR	AC 1705	10/23/97	3844		6,210.00		564.55
FXR ENTRP	4TH QTR	AC 0451	10/1/97	303		40,619.22		3,692.66
FXR ENTRP	4TH QTR	AC 0451	10/15/97	305		20,509.10		1,864.46
FXR ENTRP	4TH QTR	AC 0451	10/24/97	306		2,278.78		207.16
NEW BAGUIO JOHNNY	4TH QTR	AC 0645	10/16/97	12193		1,755.00		159.55
NEW BAGUIO JOHNNY	4TH QTR	AC 0645	10/31/97	12026		395.00		35.91
NEW BAGUIO JOHNNY	4TH QTR	AC 0645	10/13/97	12178		110.00		10.00
NEW BAGUIO JOHNNY	4TH QTR	AC 0645	10/23/97	12235		53.00		4.82
SUBIC PROTECTORS	4TH QTR	AC 1705	12/1/97	1671		124,802.28		11,345.66
SUBIC PROTECTORS	4TH QTR	AC 1705	11/15/97	1669		124,013.64		11,273.97
SUBIC PROTECTORS	4TH QTR	AC 1705	12/16/97	1673		124,605.12		11,327.74
SUBIC PROTECTORS	4TH QTR	AC 1705	12/29/97	1675		134,463.12		12,223.92
SUBIC PROTECTORS	4TH QTR	AC 1705	10/1/97	1663		138,997.80		12,636.16
SUBIC PROTECTORS	4TH QTR	AC 1705	10/16/97	1665		138,997.80		12,636.16
SUBIC PROTECTORS	4TH QTR	AC 1705	10/31/97	1667		148,067.16		13,460.65
Subtotal for the 4th quarter					P	**1,630,041.34**	P	**148,185.67**

(d) Invoices/official receipts without BIR permit

SUPPLIER	QTR. INVOLVED	ACCOUNT NO.	DATE	REFERENCE NO.		INVOICE AMOUNT		INPUT VAT
CITIMOTORS INC	3RD QTR	AC 1705		438362	P	**39,600.00**	P	**3,600.00**
BENGUET BUILDERS	4TH QTR	AC 1705	10/18/97	159	P	200,000.00	P	18,181.82
BENGUET BUILDERS	4TH QTR	AC 1705	11/13/97	199		276,000.00		25,090.91
Subtotal for the 4th quarter					P	**476,000.00**	P	**43,272.73**

(e) Without supporting document

SUPPLIER	QTR. INVOLVED	ACCOUNT NO.	DATE	REFERENCE NO.		INVOICE AMOUNT		INPUT VAT
ANITA'S DRUG	3RD QTR	AC 1705			P	81.95	P	6.81
BENGUET BUILDER'S	3RD QTR	AC 1705				148.50		13.50
BENGUET MGT.	3RD QTR	AC 0252				270,000.00		24,545.45
BENGUET MGT.	3RD QTR	AC 0252				270,000.00		24,545.45
BENGUET MGT.	3RD QTR	AC 0252				479,797.50		43,617.95
DIVINE MERCY	3RD QTR	AC 0452				1,370.00		124.55
EDIFER'S TRADING	3RD QTR	AC 1701				4,850.00		440.91
FERNANDEZ ENTRP.	3RD QTR	AC 0252				280.00		25.45
FERNANDEZ ENTRP.	3RD QTR	AC 0252				23,835.00		2,166.82
FERNANDEZ ENTRP.	3RD QTR	AC 0252				24,254.68		2,204.97
FERNANDEZ ENTRP.	3RD QTR	AC 0252				19,032.00		1,730.18
FERNANDEZ ENTRP.	3RD QTR	AC 0252				2,148.00		195.27

FERNANDEZ ENTRP.	3RD QTR	AC 0252		8,920.00		810.91
FIRST CORP.	3RD QTR	AC 0252		20,900.00		1,900.00
GST PHILIPPINES	3RD QTR	AC 0252		158,923.18		14,447.56
GST PHILIPPINES	3RD QTR	AC 0252		216,478.83		19,679.89
GST PHILIPPINES	3RD QTR	AC 0252		99,500.81		9,045.53
GST PHILIPPINES	3RD QTR	AC 0252		227,001.51		20,691.05
GST PHILIPPINES	3RD QTR	AC 0252		168,595.46		14,417.77
GST PHILIPPINES	3RD QTR	AC 0252		322,026.53		29,275.14
GST PHILIPPINES	3RD QTR	AC 0252		300,449.01		27,313.55
GST PHILIPPINES	3RD QTR	AC 0252		233,804.08		21,254.92
JANET'S PHARMACY	3RD QTR	AC 1705		135.00		12.27
JCL'26 AUTO SUPPLY	3RD QTR	AC 0452		3,062.00		278.36
JOLIBBEE UNIWIDE	3RD QTR	AC 1705		68.00		6.18
MACRO HARDWARE	3RD QTR	AC 0252		6,264.00		569.45
MACRO HARDWARE	3RD QTR	AC 0252		2,808.00		255.27
MERCURY DRUG	3RD QTR	AC 0615		59,540.20		5,412.75
MERCURY DRUG	3RD QTR	AC 0615		74,249.07		6,749.92
MERCURY DRUG	3RD QTR	AC 0615		99,950.84		9,086.44
NEW SOUTH STAR	3RD QTR	AC 1705		15,900.00		1,445.45
PHIL. EXPLOSIVES	3RD QTR	AC 0252		725,898.25		65,990.75
PHIL. EXPLOSIVES	3RD QTR	AC 0252		181,170.00		16,470.00
PHIL. EXPLOSIVES	3RD QTR	AC 0252		181,170.00		16,470.00
PHIL. EXPLOSIVES	3RD QTR	AC 0252		179,492.50		16,317.50
PHIL. EXPLOSIVES	3RD QTR	AC 0252		401,555.00		36,505.00
PHIL. EXPLOSIVES	3RD QTR	AC 0252		164,395.00		14,945.00
PHIL. EXPLOSIVES	3RD QTR	AC 0252		164,395.00		14,945.00
POWERLOCK INDUS.	3RD QTR	AC 0252		5,350.00		486.36
POWERLOCK INDUS.	3RD QTR	AC 0252		3,351.00		304.64
POWERLOCK INDUS.	3RD QTR	AC 0252		11,080.00		1,007.27
RICMAR DIESEL CTR.	3RD QTR	AC 0645		2,250.00		204.55
SIMPLEX MERCHANDISING	3RD QTR	AC 0252		73,338.00		6,667.09
UNION TRANSPORT	3RD QTR	AC 0450		2,255.00		205.00
Subtotal for the 3rd quarter			**P**	**5,210,073.90**	**P**	**472,787.88**
ARCHILLES MFG	4TH QTR	AC 1702	P	5,800.00	P	527.27
FAIRCARGO	4TH QTR	AC 0261		37.13		3.38
FAIRCARGO	4TH QTR	AC 0261		37.13		3.38
FAIRCARGO	4TH QTR	AC 0261		37.13		3.38
FXR ENTRP	4TH QTR	AC 0451		4,513.25		410.30
GLENNWOOD COML	4TH QTR	AC 1702		8,800.00		800.00
GO TRADER'S	4TH QTR	AC 0451		86,879.76		7,898.16
JCR GEN SERV	4TH QTR	AC 0451		18,675.61		1,697.78
JMK MARKETING	4TH QTR	AC 1705		850.00		77.27
JOMECA DETECTIVE I	4TH QTR	AC 0644		81,322.04		7,392.91
LIGHT SECURITY	4TH QTR	AC 0644		116,856.45		10,623.31
MERCURY DRUG CORP.	4TH QTR	AC 1705		62.95		5.72
PILIPINAS SHELL	4TH QTR	AC 1702		3,260.40		296.40
PILIPINO TELEPHONE	4TH QTR	AC 0644		5,085.03		462.02
PILIPINO TELEPHONE	4TH QTR	AC 0644		17,474.94		1,588.63
PILTEL	4TH QTR	AC 0451		2,325.43		138.18
TAMBAL ATBPA	4TH QTR	AC 1705		360.00		32.73

Subtotal for the 4th quarter					P	**352,377.25**	P	**31,960.82**

(f) Invoices/official receipts without an indicated date

SUPPLIER	QTR. INVOLVED	ACCOUNT NO.	DATE	REFERENCE NO.		INVOICE AMOUNT		INPUT VAT
MOTHER & CHILD	4TH QTR	AC 0452		65	P	27,180.25	P	2,470.93
MOTHER & CHILD	4TH QTR	AC 0452		853		8,727.25		793.39
MOTHER & CHILD	4TH QTR	AC 0452		854		17,023.25		1,547.57
MOTHER & CHILD	4TH QTR	AC 0452		855		2,929.50		266.32
MOTHER & CHILD	4TH QTR	AC 0452		856		2,293.75		208.52
MOTHER & CHILD	4TH QTR	AC 0452		857		2,375.00		215.91
MOTHER & CHILD	4TH QTR	AC 0452		942		18,390.75		1,671.89
MOTHER & CHILD	4TH QTR	AC 0452		943		14,730.25		1,339.11
MOTHER & CHILD	4TH QTR	AC 0452		944		28,785.75		2,616.89
MOTHER & CHILD	4TH QTR	AC 0452		945		35,638.25		3,239.84
Subtotal for the 4th quarter					P	**158,074.00**	P	**14,370.37**

(g) Non-VAT invoices/official receipts

SUPPLIER	QTR. INVOLVED	ACCOUNT NO.	DATE	REFERENCE NO.		INVOICE AMOUNT		INPUT VAT
MADRIGAL-WAN HAI	3RD QTR	AC 0261	8/5/98	0378	P	31,440.00	P	2,858.18
MADRIGAL-WAN HAI	3RD QTR	AC 0261	8/5/98	0379		8,880.00		807.27
UNION GAS HAULING	3RD QTR	AC 0261	6/17/97	658		35,778.73		3,252.61
UNION GAS HAULING	3RD QTR	AC 0261	7/7/97	664		58,488.17		5,316.92
UNION GAS HAULING	3RD QTR	AC 0261	9/8/97	680		84,213.92		7,655.81
Subtotal for the 3rd quarter					P	**218,800.82**	P	**19,890.79**
BENGUET CORP.	4TH QTR	AC 0452	10/2/97	4153		26,543.00		2,413.00
BENGUET CORP.	4TH QTR	AC 0452	10/2/97	4167		8,861.60		805.60
Subtotal for the 4th quarter					P	**35,404.60**	P	**3,218.60**

(h) Not within the period of claim

SUPPLIER	QTR. INVOLVED	ACCOUNT NO.	DATE	REFERENCE NO.		INVOICE AMOUNT		INPUT VAT
BBC COMML TRUCKING	3RD QTR	AC 1705	3/8/97	105	P	11,491.35	P	1,044.67
FARMACIA CASTILLO	3RD QTR	AC 1705	5/22/97	77103		695.00		63.18
FARMACIA CASTILLO	3RD QTR	AC 1705	9/18/97	77225		1,285.00		116.82
FARMACIA CASTILLO	3RD QTR	AC 1705	6/18/97	77226		765.00		69.55
FARMACIA CASTILLO	3RD QTR	AC 1705	6/10/97	77228		940.00		85.45
FARMACIA CASTILLO	3RD QTR	AC 1705	6/7/97	77229		605.00		55.00
FARMACIA CASTILLO	3RD QTR	AC 1705	5/22/97	77107		1,095.00		99.55
FARMACIA CASTILLO	3RD QTR	AC 1705	6/11/97	77230		230.00		20.91
FARMACIA CASTILLO	3RD QTR	AC 1705	5/29/97	77232		4,745.00		158.64
FARMACIA CASTILLO	3RD QTR	AC 1705	6/12/97	77233		1,472.50		133.86
FARMACIA CASTILLO	3RD QTR	AC 1705	6/20/97	77234		832.00		75.64

FARMACIA CASTILLO	3RD QTR	AC 1705	5/22/97	77106		1,445.00		131.36
FARMACIA CASTILLO	3RD QTR	AC 1705	5/22/97	77105		2,153.00		195.77
FARMACIA CASTILLO	3RD QTR	AC 1705	5/22/97	77104		288.00		26.18
FARMACIA CASTILLO	3RD QTR	AC 1705	6/18/97	77224		1,335.00		121.36
GEOMETRIC CONS.	3RD QTR	AC 1705	3/8/97	1036		90,588.30		8,235.30
GEOMETRIC CONS.	3RD QTR	AC 1705	2/19/97	2583		91,606.80		8,327.89
GEOMETRIC CONS.	3RD QTR	AC 1705	2/4/97	2578		99,785.80		9,071.44
GEOMETRIC CONS.	3RD QTR	AC 1705	2/13/97	2592		91,748.60		8,340.78
GRAM COMPUTER	3RD QTR	AC 1705	2/3/97	119		11,109.37		1,009.94
GRAM COMPUTER	3RD QTR	AC 1705	5/20/97	255		11,109.37		1,009.94
GRAM COMPUTER	3RD QTR	AC 1705	6/20/97	312		11,109.37		1,009.94
GRAM COMPUTER	3RD QTR	AC 1705	6/20/97	313		11,109.37		1,009.94
GRAYBAR MKTG	3RD QTR	AC 1701	2/26/96	157		38,280.00		3,480.00
MACRO HARDWARE	3RD QTR	AC 1702	5/14/97	23828		17,310.00		1,573.64
MACRO HARDWARE	3RD QTR	AC 1702	5/14/97	23829		948.00		86.18
MACRO HARDWARE	3RD QTR	AC 1702	6/2/97	24126		2,300.00		209.09
MACRO HARDWARE	3RD QTR	AC 1702	6/20/97	24429		10,800.00		981.82
NEW MASINLOC	3RD QTR	AC 1705	5/20/97	92270		520.00		47.27
NEW MASINLOC	3RD QTR	AC 1705	5/20/97	92271		6,830.00		620.91
NEW MASINLOC	3RD QTR	AC 1705	6/20/97	92850		3,200.00		290.91
NEW MASINLOC	3RD QTR	AC 1705	6/3/97	92317		1,340.00		121.82
NEW MASINLOC	3RD QTR	AC 1705	5/20/97	92272		2,208.00		200.73
NEW MASINLOC	3RD QTR	AC 1705	5/28/97	92269		600.00		54.55
NORDBERG PHILS	3RD QTR	AC 0252	6/5/97	598		12,100.00		1,100.00
PAULIRENZ RUBBER	3RD QTR	AC 1702	6/30/97	0009		36,875.00		3,352.27
PHILGERMA MFG	3RD QTR	AC 1705	4/15/97	1185		5,937.20		539.75
SYDEHAM PHARMA.	3RD QTR	AC 0615	6/11/97	36827		1,666.46		151.50
VF INDUSTRIAL SALES	3RD QTR	AC 1702	8/1/96	2947		38,840.00		3,167.27
VF INDUSTRIAL SALES	3RD QTR	AC 1702	9/11/96	3105		18,037.50		1,639.77
VF INDUSTRIAL SALES	3RD QTR	AC 1702	6/16/97	3351		25,727.35		2,338.85
VF INDUSTRIAL SALES	3RD QTR	AC 1702	6/23/97	3352		35,793.75		3,253.98
VF INDUSTRIAL SALES	3RD QTR	AC 1702	6/23/97	3353		35,268.75		3,206.25
ZUELLIG INSURANCE	3RD QTR	AC 0615	4/28/97	630013		495.00		45.00
ZUELLIG INSURANCE	3RD QTR	AC 0615	4/28/97	630014		22,938.41		2,085.31
Subtotal for the 3rd quarter					**P**	**765,559.25**	**P**	**68,959.98**
BENGUETRADE, INC.	4TH QTR	AC 1705	6/24/97	014	P	189,145.00	P	17,195.00
BENGUETRADE, INC.	4TH QTR	AC 1705	6/24/97	013		189,145.00		17,195.00
BENGUETRADE, INC.	4TH QTR	AC 1705	6/24/97	015		189,145.00		17,195.00
BONAVENTURE GRAPHIC	4TH QTR	AC 0632	4/28/97	00301		21,360.00		1,941.82
CAPITOL PUBLISHING	4TH QTR	AC 0632	5/2/97	7680		32,300.00		2,936.36
DIZ-MAC INSURANCE	4TH QTR	AC 0633	8/27/96	7126		550.00		50.00
DIZ-MAC INSURANCE	4TH QTR	AC 0633	9/13/96	7183		33,788.70		3,071.70
DIZ-MAC INSURANCE	4TH QTR	AC 0633	1/7/97	7502		1,017.50		92.50
DIZ-MAC INSURANCE	4TH QTR	AC 0633	5/14/97	8043		118,053.40		10,732.13
DIZ-MAC INSURANCE	4TH QTR	AC 0633	6/25/97	8166		22,000.00		2,000.00
MEDAL PRINTERS	4TH QTR	AC 0632	3/13/98	2266		6,866.75		624.25
PACIFIC OFFICE MACHINES	4TH QTR	AC 0615	3/14/97	47339		1,430.00		130.00
R. CERVANTES ENG'G	4TH QTR	AC 0452	6/17/97	20503		15,500.00		1,409.09
ZUELLIG INSURANCE	4TH QTR	AC 0633	2/21/96	608279		172,975.00		15,725.00
ZUELLIG INSURANCE	4TH QTR	AC 0633	3/18/96	609782		3,160.19		287.29
ZUELLIG INSURANCE	4TH QTR	AC 0633	6/18/96	614494		664.29		60.39

ZUELLIG INSURANCE	4TH QTR	AC 0633	1/8/97	623901		3,160.19		287.29
ZUELLIG INSURANCE	4TH QTR	AC 0633	2/18/97	625898		172,975.00		15,725.00
ZUELLIG INSURANCE	4TH QTR	AC 0633	2/28/97	626743		8,018.98		729.00
ZUELLIG INSURANCE	4TH QTR	AC 0633	2/28/97	626744		1,056.00		96.00
ZUELLIG INSURANCE	4TH QTR	AC 0633	4/16/97	629281		9,007.06		818.82
ZUELLIG INSURANCE	4TH QTR	AC 0633	4/29/97	629899		2,586.55		235.14
ZUELLIG INSURANCE	4TH QTR	AC 0633	4/30/97	629904		7,647.73		695.25
ZUELLIG INSURANCE	4TH QTR	AC 0633	5/31/97	632492		539.00		49.00
ZUELLIG INSURANCE	4TH QTR	AC 0633	5/31/97	632499		990.00		90.00
ZUELLIG INSURANCE	4TH QTR	AC 0633	6/11/97	633027		552.29		50.21
ZUELLIG INSURANCE	4TH QTR	AC 0633	6/23/97	633915		1,056.00		96.00
ZUELLIG INSURANCE	4TH QTR	AC 0633	6/25/97	633952		5,730.35		520.94
ZUELLIG INSURANCE	4TH QTR	AC 0633	6/25/97	633957		9,326.46		847.86
ZUELLIG INSURANCE	4TH QTR	AC 1701	12/29/94	589070		655.93		59.63
ZUELLIG INSURANCE	4TH QTR	AC 1701	6/14/95	596944		2,028.51		184.41
ZUELLIG INSURANCE	4TH QTR	AC 1701	7/14/95	598464		655.93		59.63
ZUELLIG INSURANCE	4TH QTR	AC 1701	8/18/95	600266		2,028.51		184.41
ZUELLIG INSURANCE	4TH QTR	AC 1701	3/18/96	609782		187.88		17.08
ZUELLIG INSURANCE	4TH QTR	AC 1701	10/22/96	621068		234.30		21.30
ZUELLIG INSURANCE	4TH QTR	AC 1701	10/22/96	621069		132.00		12.00
ZUELLIG INSURANCE	4TH QTR	AC 1701	10/23/96	621294		256.30		23.30
ZUELLIG INSURANCE	4TH QTR	AC 1701	1/8/97	623901		256.30		23.30
ZUELLIG INSURANCE	4TH QTR	AC 1701	4/24/97	629787		3,278.00		298.00
ZUELLIG INSURANCE	4TH QTR	AC 1701	4/30/97	629903		4,081.11		371.01
ZUELLIG INSURANCE	4TH QTR	AC 1701	5/9/97	630979		357.50		325.00
ZUELLIG INSURANCE	4TH QTR	AC 1701	5/15/97	631313		2,799.83		254.53
ZUELLIG INSURANCE	4TH QTR	AC 1701	5/27/97	631430		8,678.85		788.99
ZUELLIG INSURANCE	4TH QTR	AC 1701	6/11/97	633280		1,188.00		108.00
ZUELLIG INSURANCE	4TH QTR	AC 1701	6/16/97	633416		770.00		70.00
ZUELLIG INSURANCE	4TH QTR	AC 1701	6/30/97	634699		1,188.00		108.00
Subtotal for the 4th quarter					**P**	**1,248,523.39**	**P**	**113,794.63**

(i) Pre-printed "TIN"/"V"/"VAT" after July 31, 1991

SUPPLIER	QTR. INVOLVED	ACCOUNT NO.	DATE	REFERENCE NO.		INVOICE AMOUNT		INPUT VAT
BEGONSA CONS.	3RD QTR	AC 0251	8/15/97	1071	P	286,678.48	P	26,061.68
BEGONSA CONS.	3RD QTR	AC 0251	8/23/97	1073		200,222.71		18,202.06
BEGONSA CONS.	3RD QTR	AC 0251	9/13/97	1075		106,752.30		9,704.75
BEGONSA CONS.	3RD QTR	AC 0251	9/27/97	1076		116,503.95		10,591.27
BEGONSA CONS.	3RD QTR	AC 0251	7/9/97	1069		286,350.32		26,031.85
BEGONSA CONS.	3RD QTR	AC 0251	7/29/97	1070		119,742.90		10,885.72
BEGONSA CONS.	3RD QTR	AC 0251	8/1/97	1072		104,447.62		9,495.24
FERNANDEZ ENTRP.	3RD QTR	AC 0645	6/17/97	4252		6,300.00		572.73
FERNANDEZ ENTRP.	3RD QTR	AC 0645	7/4/97	4266		2,874.00		261.27
FERNANDEZ ENTRP.	3RD QTR	AC 0645	7/4/97	4265		2,874.00		261.27
FERNANDEZ ENTRP.	3RD QTR	AC 0645	7/19/97	4271		6,300.00		572.73
FERNANDEZ ENTRP.	3RD QTR	AC 0645	7/16/97	4270		3,150.00		286.36
FERNANDEZ ENTRP.	3RD QTR	AC 0645	7/24/97	4274		3,200.00		290.91
FERNANDEZ ENTRP.	3RD QTR	AC 0645	8/12/97	4281		17,270.00		1,570.00
FERNANDEZ ENTRP.	3RD QTR	AC 0645	8/14/97	4284		6,316.00		574.18
FERNANDEZ ENTRP.	3RD QTR	AC 0645	8/18/97	4288		3,158.00		287.09

FERNANDEZ ENTRP.	3RD QTR	AC 0645	8/26/97	4296		6,040.00		549.09
FERNANDEZ ENTRP.	3RD QTR	AC 0645	8/29/97	4299		5,361.00		487.36
FERNANDEZ ENTRP.	3RD QTR	AC 0645	9/2/97	4300		480.00		43.64
FERNANDEZ ENTRP.	3RD QTR	AC 0645	8/19/97	4291		6,477.00		588.82
FERNANDEZ ENTRP.	3RD QTR	AC 0645	8/19/97	4292		8,016.00		728.73
Subtotal for the 3rd quarter					P	**1,298,514.28**	P	**118,046.75**
BEGONSA CONS.	4TH QTR	AC 0251	10/3/97	1077		72,060.60		6,550.96
BEGONSA CONS.	4TH QTR	AC 0251	10/11/97	1079		133,785.74		12,162.34
BEGONSA CONS.	4TH QTR	AC 0251	10/20/97	1080		15,023.83		1,365.80
BEGONSA CONS.	4TH QTR	AC 0251	10/3/97	1078		5,056.48		459.68
FERNANDEZ ENTRP.	4TH QTR	AC 0645	8/22/97	4294		320.00		29.09
FERNANDEZ ENTRP.	4TH QTR	AC 0645	9/17/97	2840		7,875.00		715.91
FERNANDEZ ENTRP.	4TH QTR	AC 0645	9/17/97	2839		15,100.00		1,372.73
FERNANDEZ ENTRP.	4TH QTR	AC 0645	10/9/97	2881		3,432.00		312.00
FERNANDEZ ENTRP.	4TH QTR	AC 0645	10/13/97	2884		1,697.00		154.27
FERNANDEZ ENTRP.	4TH QTR	AC 0645	10/13/97	2885		1,697.00		154.27
FERNANDEZ ENTRP.	4TH QTR	AC 0252	7/5/97	24267		53,261.80		4,841.98
FERNANDEZ ENTRP.	4TH QTR	AC 0252	7/16/97	4269		280.00		25.45
FERNANDEZ ENTRP.	4TH QTR	AC 0252	8/1/97	4276		800.00		72.73
FERNANDEZ ENTRP.	4TH QTR	AC 0252	8/15/97	4286		620.00		56.36
FERNANDEZ ENTRP.	4TH QTR	AC 0252	8/20/97	4293		33,636.00		3,057.82
Subtotal for the 4th quarter					P	**344,645.45**	P	**31,331.39**

(j) Invoice/official receipt twice recorded

SUPPLIER	QTR. INVOLVED	ACCOUNT NO.	ACCOUNT DATE	REFERENCE NO.		INVOICE AMOUNT		INPUT VAT
FRONTIER'S SEC & D.A.	3RD QTR	AC 0615	9/10/97	91097	P	**39,968.74**	P	**3,633.52**

(k) Overstatement of input tax claimed per invoices/official receipts

SUPPLIER	QTR. INVOLVED	ACCOUNT NO.	ACCOUNT DATE	REFERENCE NO.		INVOICE AMOUNT		INPUT VAT
RENICA EARTHMOVERS	3RD QTR	AC 1705	7/31/97	52				
			181,677.50					
			104,833.73		P	76,843.77	P	6,985.80
RENICA EARTHMOVERS	3RD QTR	AC 1705	9/1/97	53				
			218,186.50					
			139,726.31			78,460.19		7,132.74
RENICA EARTHMOVERS	3RD QTR	AC 1705	9/29/97	9				
			134,011.75					
			89,152.54			44,859.21		4,078.11
VCP INTERMED	3RD QTR	AC 1705	7/19/97	201567				
			8617.26					
			8017.26			600.00		54.55
Subtotal for 3rd quarter					P	**200,763.17**	P	**18,251.20**

Total for the 3rd quarter	**P 11,224,961.00**	**P 1,018,948.75**
Total for the 4th quarter	**P 5,193,291.39**	**P 472,663.81**
Grand Total	**P 16,418,252.39**	**P 1,491,612.56**

In fine, Petitioner is entitled to the refund of unutilized input VAT in a reduced amount of P13,531,670.26, computed as follows;

	3rd Quarter	4th Quarter	Total
Total Amount Claimed	P 12,592,011.34	P 3,593,714.65	P 16,185,725.99
Less: Disallowances			
(a) Per independent's CPA's verification	P 797,122.78	P 343,923.63	P 1,141,046.41
(b) Unreported sales	21,396.76		21,396.76
(c) Per Court's verification	1,018,948.75	472,663.81	1,491,612.56
Total Disallowances	P 1,837,468.29	P 816,587.44	P 2,654,055.73
Net Amount Refundable	**P 10,754,543.05**	**P 2,777,127.21**	**P 13,531,670.26**

WHEREFORE, in view of the foregoing, the instant Petition for Review is hereby **PARTIALLY GRANTED**. Respondent is **ORDERED** to **REFUND** or **ISSUE A TAX CREDIT CERTIFICATE** in favor of Petitioner in the amount of P13,531,670.26.

SO ORDERED.

ERNESTO D. ACOSTA
Presiding Judge

WE CONCUR:

AMANCIO Q. SAGA
Associate Judge

JUANITO C. CASTAÑEDA, JR.
Associate Judge

CERTIFICATION

I hereby certify that the above decision was reached after due consultation with the members of the Court of Tax Appeals in accordance with Section 13, Article VIII of the Constitution.

ERNESTO D. ACOSTA
Presiding Judge