

REPUBLIC OF THE PHILIPPINES
COURT OF TAX APPEALS
QUEZON CITY

THIRD DIVISION

CBK POWER COMPANY
LIMITED,

CTA CASE NO. 7887

Petitioner,

-versus-

Members:

BAUTISTA, Chairperson;
FABON-VICTORINO,
RINGPIS-LIBAN, JJ.

COMMISSIONER OF
INTERNAL REVENUE

Respondent.

Promulgated:

OCT 10 2017

3:38 p.m.

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AMENDED DECISION

RINGPIS-LIBAN, J.:

For resolution is Petitioner's "Motion for Reconsideration" filed on June 27, 2017, with Respondent's "Opposition (To Petitioner's Motion for Reconsideration dated 27 June 2017)" filed on July 21, 2017.

Pursuant to Republic Act No. 9513 or the Renewable Energy Act of 2008 ("RA 9513"), the Court in the Decision promulgated on June 06, 2017 ("Assailed Decision") denied Petitioner's claim for refund in the amount of [Php]58,802,851.18, allegedly representing its unutilized input taxes paid on its local purchases and/or importation of goods and services, capital goods and payments for services rendered by non-residents, which were all attributable to its zero-rated sales for the period January 1, 2007 to December 31, 2007 ("taxable year 2007"). The Court held that Petitioner could not have paid input taxes on its purchases of goods and services from value-added tax ("VAT") registered suppliers because such purchases are zero-rated (*i.e.*, no output tax was paid by the suppliers, thus no input tax was shifted or passed on to Petitioner). The dispositive portion of the Assailed Decision reads:

"WHEREFORE, premises considered, the Petition for Review is **DENIED** for lack of merit."

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SO ORDERED.”

In its “Motion for Reconsideration”, Petitioner alleges that the Court erroneously held that its recourse for its purchases of goods and services where it paid VAT is to seek reimbursement of its alleged input VAT paid from its suppliers of goods and services, and not a claim for refund against Respondent since its purchases of local goods, properties and services are subject to zero percent (0%) VAT under RA 9513.

Petitioner contends that RA 9513 is not applicable to its claim for unutilized input taxes paid or incurred on its purchases of goods and services for the period taxable year 2007, which is all attributable to its zero-rated sales for the same period, pursuant to Sections 108(B)(7), 112(A) and 112(C) of the National Internal Revenue Code (“NIRC”) of 1997. Petitioner argues that it is not a registered Renewable Energy Developer (“RE Developer”) and as such, it cannot avail of the fiscal incentives under RA 9513.

Furthermore, Petitioner posits that assuming without conceding that RA 9513 applies to Petitioner, Petitioner’s importation of goods and payments for services rendered by non-residents are not covered by RA 9513, and should not have been disallowed. Additionally, Petitioner argues that the Supreme Court and Court of Tax Appeals cases of *Coral Bay Nickel Corporation v. Commissioner of Internal Revenue*¹ are not analogous to Petitioner’s case since it is not a PEZA-registered Ecozone Enterprise under Republic Act No. 7916. Lastly, Petitioner insists that *solutio indebiti* governs the instant case since Respondent received something that it was not entitled to.

On the other hand, in his “Opposition (To Petitioner’s Motion for Reconsideration dated 27 June 2017)”, Respondent argues that the Court correctly ruled that Petitioner is not entitled to the issuance of a tax credit certificate (“TCC”) for unutilized input VAT in the amount of Php58,802,851.18, allegedly representing its unutilized input taxes on its local purchases and/or importation of goods and services, capital goods and payments for services rendered by non-residents; that the Court emphasized in the Assailed Decision that as an RE developer, Petitioner is entitled to zero-rated VAT on its purchases of local supply of goods, properties and services needed for the development, construction and installation of its plant facilities and to the whole process of exploring and developing renewable energy sources up to its conversion into power, and consequently, no output VAT shall be shifted to or passed on to RE developers, such as Petitioner, in connection with the above-mentioned purchases; that applying the Supreme Court cases of *Contex Corporation v. Commissioner of Internal Revenue*² and *Coral Bay Nickel Corporation v.*

¹ G.R. No. 190506, June 13, 2016; CTA EB No. 403, May 29, 2009; CTA Case No. 7022, March 10, 2008.

² G.R. No. 151135, July 02, 2004.

*Commissioner of Internal Revenue*³, it is the Petitioner's suppliers who are the proper parties to claim the tax credit and accordingly refund the Petitioner of the VAT erroneously passed on to the latter; and that all told, Petitioner did not present any compelling ground to justify the reversal of the subject Decision.

After taking a second hard look at the factual circumstances and the pertinent legal issues of this case, We find merit in Petitioner's "Motion for Reconsideration".

As mentioned in the Decision sought to be reconsidered, Petitioner must prove that it complied with all the requisites under Section 112(A) of the NIRC of 1997, in order to be entitled to the issuance of a TCC for unutilized input VAT on its local purchases and/or importation of goods and services, capital goods and payments for services rendered by non-residents. Said requisites are as follows:

- 1) The taxpayer is VAT-registered;
- 2) The taxpayer's sales are zero-rated or effectively zero-rated;
- 3) The creditable input taxes are attributable to zero-rated sales or effectively zero-rated sales and were not applied against any output VAT liability; and
- 4) The administrative and judicial claim for refund must be timely filed.

In the Assailed Decision, We already held that the first, second and fourth requisites above were complied with. To reiterate:

- a) Petitioner's administrative and judicial claims were timely filed⁴, the **fourth requisite**;
- b) Petitioner was able to prove the **first requisite** that it is a VAT-registered entity⁵; and
- c) Petitioner was also able to prove the **second requisite** that it is engaged in the sale of electricity generated through hydropower which is subject to zero percent (0%) VAT.⁶

However, as verified by this Court, not all sales/receipts of Petitioner qualify for VAT zero-rating pursuant to Section 108(B)(7) of the NIRC of 1997.

In its Quarterly VAT Returns for taxable year 2007, Petitioner reflected a total amount of Php5,742,547,292.51 zero-rated sales/receipts, broken down as follows:

³ G.R. No. 190506, June 13, 2016.

⁴ Decision, Docket, pp. 1323-1325.

⁵ Decision, *Id.*, pp. 1312.

⁶ Decision, *Id.*, pp. 1325-1328.

Exhibit	Taxable Period	Zero-Rated Sales/Receipts
“BB-2-0001” to “BB-2-0002”	1 st Quarter	Php 1,516,247,611.76
“BB-4-0002” to “BB-4-0003”	2 nd Quarter	1,460,861,709.16
“BB-6-0002 to “BB-6-0003”	3 rd Quarter	1,429,445,161.17
“BB-8-0002” to “BB-8-0003”	4 th Quarter	1,335,992,810.42
Total		Php 5,742,547,292.51

However, the Court-commissioned Independent CPA (“ICPA”) noted a total amount of Php6,794,522.94 discrepancy between sales per invoices and those per official receipts, detailed as follows:⁷

Invoice			Official Receipt			Difference			
Exhibit	No.	Amount	Exhibit	No.	Amount	In USD	Rate	In PHP	Nature
“II-00034”	1136	11,442,391.80	“MM-18” “MM-73”	1839 1922	11,422,391.80			20,000.00	error in invoice amount
“II-00067”	1171	2,172,210.00	“MM-175” “MM-222”	1889 1994	2,166,377.45	5,832.55	48.122	280,673.97	receivables written-off
“II-00068”	1172	11,437,407.36	“MM-40” “MM-104”	1880 1992	11,406,697.05			30,710.31	receivables written-off
“II-00069”	1173	2,195,950.00	“MM-176” “MM-212”	1890 1968	2,185,372.00	10,578.00	48.122	509,034.52	receivables written-off
“II-00072”	1179	219,595.00	“MM-179” “MM-201”	1893 1945	212,445.38	7,149.62	48.122	344,054.01	receivables written-off
“II-00073”	1178	1,156,240.64	“MM-43” “MM-72”	1883 1921	1,117,056.08			39,184.56	receivables written-off
“II-00074”	1177	219,595.00	“MM-178” “MM-201”	1892 1945	212,153.01	7,441.99	48.122	358,123.44	receivables written-off
“II-00075”	1180	1,156,240.64	“MM-44” “MM-72”	1884 1921	1,118,595.50			37,645.14	receivables written-off
“II-00076”	1174	11,562,406.35	“MM-41” “MM-90”	1881 1969	11,506,709.68			55,696.67	receivables written-off
“II-00077”	1181	130,570.00	“MM-180” “MM-201”	1894 1945	127,303.73	3,266.27	48.122	157,179.45	receivables written-off
“II-00078”	1182	687,494.43	“MM-45” “MM-72”	1885 1921	670,296.45			17,197.98	receivables written-off
“II-00079”	1183	130,570.00	“MM-181” “MM-201”	1895 1945	127,273.04	3,296.96	48.122	158,656.31	receivables written-off
“II-00080”	1184	687,494.43	“MM-46” “MM-72”	1886 1921	670,134.82			17,359.61	receivables written-off
“II-00081”	1185	11,870.00	“MM-182” “MM-201”	1896 1945	9,562.06	2,307.94	48.122	111,062.69	receivables written-off
“II-00082”	1186	62,499.49	“MM-47” “MM-72”	1887 1921	50,347.40			12,152.09	receivables written-off
“II-00085”	1189	2,172,210.00	“MM-184” “MM-201”	1927 1994	2,166,377.45	5,832.55	47.449	276,748.66	receivables written-off
“II-00086”	1190	11,379,052.53	“MM-52” “MM-104”	1901 1992	11,348,498.90			30,553.63	receivables written-off
“II-00087”	1191	2,195,950.00	“MM-185” “MM-201”	1928 1968	2,185,372.16	10,577.84	47.449	501,907.93	receivables written-off
“II-00088”	1192	11,503,413.76	“MM-59” “MM-90”	1908 1969	11,448,001.25			55,412.51	receivables written-off
“II-00091”	1195	219,595.00	“MM-186” “MM-201”	1930 1945	212,153.01	7,441.99	47.449	353,114.98	receivables written-off
“II-00092”	1196	1,150,341.38	“MM-58” “MM-201”	1907 1945	1,111,356.74			38,984.64	receivables written-off
“II-00093”	1197	219,595.00	“MM-187” “MM-201”	1931 1945	212,445.38	7,149.62	47.449	339,242.32	receivables written-off
“II-00094”	1198	1,150,341.38	“MM-54” “MM-201”	1903 1945	1,112,888.31			37,453.07	receivables written-off

⁷ Exhibit NN.

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Invoice			Official Receipt			Difference			
Exhibit	No.	Amount	Exhibit	No.	Amount	In USD	Rate	In PHP	Nature
"II-00095"	1199	130,570.00	"MM-189"	1932 1933	124,256.89	6,313.11	47.449	299,550.76	receivables written-off
"II-00096"	1200	683,986.76	"MM-55"	1904	650,915.75			33,071.01	receivables written-off
"II-00097"	1202	683,986.76	"MM-57"	1906	666,715.73			17,271.03	receivables written-off
"II-00098"	1203	11,870.00	"MM-"	1934	1,774.80	10,095.20	47.449	479,007.14	receivables written-off
"II-00099"	1204	62,180.61	"MM-56"	1905	9,297.25			52,883.36	receivables written-off
"II-00100"	1201	130,570.00	"MM-190"	1933 1932	127,273.04	3,296.96	47.449	156,437.45	receivables written-off
"II-00103"	1207	2,172,210.00	"MM-193"	1936 1994	2,166,377.45	5,832.55	45.922	267,842.36	receivables written-off
"II-00104"	1208	11,173,193.06	"MM-75"	1924	11,143,192.18			30,000.88	receivables written-off
			"MM-104"	1992					
"II-00105"	1209	2,195,950.00	"MM-194"	1937 1968	2,185,372.00	10,578.00	45.922	485,762.92	receivables written-off
"II-00107"	1210	11,295,304.46	"MM-70"	1919	11,240,894.43			54,410.03	receivables written-off
			"MM-90"	1969					
"II-00121"	1225	2,172,210.00	"MM-204"	1959 1994	2,166,377.45	5,832.55	46.222	269,592.13	receivables written-off
"II-00122"	1226	11,265,866.46	"MM-81"	1950	11,235,616.75			30,249.71	receivables written-off
			"MM-104"	1992					
"II-00123"	1228	2,195,950.00	"MM-205"	1960 2019	2,185,372.00	10,578.00	46.222	488,936.32	receivables written-off
"II-00124"	1229	11,388,990.68	"MM-82"	1951	11,334,129.36			54,861.32	receivables written-off
			"MM-106"	2004					
"II-00139"	1244	2,172,210.00	"MM-"	1981	2,166,377.45	5,832.55	45.048	262,744.71	receivables written-off
"II-00140"	1245	11,080,996.30	"MM-96"	1975	11,051,242.98			29,753.32	receivables written-off
					Total			6,794,522.94	

The ICPA indicated that the Php6,794,522.94 discrepancy pertains to receivables written-off save for the amount of Php20,000.00 which pertains to an error in the invoice amount. However, the Court cannot ascertain the veracity of the ICPA’s finding without the supporting documents. Hence, for being unsupported, the amount of Php6,794,522.94 shall be denied of VAT zero-rating.

Therefore, only sales totaling to Php5,735,752,769.57, as computed below, are subject to zero percent (0%) VAT pursuant to Section 108(B)(7) of the NIRC of 1997, as amended:

Total declared zero-rated sales/receipts per VAT returns	Php 5,742,547,292.51
Less: Disallowances per this Court’s verification	6,794,522.94
Total valid zero-rated sales/receipts	Php 5,735,752,769.57

With regard to the **third requisite**, (*i.e.*, that the creditable input taxes are attributable to zero-rated sales or effectively zero-rated sales and were not applied against any output VAT liability), the Court deems that its prior conclusion in the Assailed Decision merits reconsideration.



The Court agrees with the Petitioner that RA 9513 does not apply in the instant case, which is a claim for taxable year 2007. RA 9513 was approved only on December 16, 2008, and took effect fifteen (15) days after its publication in at least two (2) newspapers of general circulation.⁸ Accordingly, RA 9513 cannot be made applicable for claims prior to its effectivity.

Hence, after having resolved that Petitioner had VAT zero-rated sales/receipts for the subject period of claim, we proceed to the determination of whether Petitioner incurred input taxes in connection thereto and if said input taxes were not applied against any output VAT liability of Petitioner.

For taxable year 2007, Petitioner reported input VAT in the total amount of Php59,116,694.23, as broken down below:

	1 st Quarter “BB-2-001” to “BB-2-002”	2 nd Quarter “BB-4-002” to “BB-4-003”	3 rd Quarter “BB-6-002” to “BB-6-003”	4 th Quarter “BB-8-002” to “BB-8-003”	Total
Deferred on capital goods exceeding P1Million from previous quarter	Php 7,088,923.74	Php 7,525,499.50	Php 7,294,079.65	Php6,805,042.78	Php 7,088,923.74
Purchase of capital goods not exceeding Php1Million	-	-	-	71,441.58	71,441.58
Purchase of capital goods exceeding Php1Million	888,733.71	252,447.95	-	-	1,141,181.66
Domestic purchases of goods other than capital goods	1,498,009.98	6,265,547.38	4,757,254.45	2,897,263.08	15,418,074.89
Importation of goods other than capital goods	318,514.00	145,810.00	5,485,743.78	3,934,822.00	9,884,889.78
Domestic purchase of services	6,707,524.18	7,105,059.21	7,299,428.67	9,338,859.16	30,450,871.22
Services rendered by non-residents	435,361.82	498,280.99	62,116.07	381,558.38	1,377,317.26
Less: Purchases of capital goods exceeding P1Million deferred for the succeeding period	7,525,499.50	7,294,079.65	6,805,042.78	6,316,005.90	6,316,005.90
Total	Php12,154,617.76	Php26,653,183.14	Php44,746,762.98	Php3,056,892.88	Php59,116,694.23

Of the Php59,116,694.23 declared input VAT, Petitioner seeks the refund of a lesser amount of Php58,802,851.18, reconciled as follows:

Total input VAT per returns	Php 59,116,694.23
Less: Input tax not included in claim for VAT refund/TCC in 2007, since these are not included in the pertinent Summary List of Purchases	313,843.02
Total Claim for Refund / TCC	Php 58,802,851.18

Since Petitioner’s reported sales were all zero-rated, the claimed input VAT of Php58,802,851.18 is entirely attributable thereto and the same was not applied against any output VAT.

⁸ Section 40 of Republic Act No. 9513.

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Further, the total claim of Php58,802,851.18 was deducted from the total available input tax reflected in Petitioner's amended Quarterly VAT Return for the fourth quarter of taxable year 2007. Consequently, the subject claim no longer formed part of the excess input VAT of Php3,056,892.88 as of the fourth quarter of taxable year 2007, which was carried over to the succeeding quarter.

Based on the ICPA's report, the following input VAT shall be disallowed for non-compliance with the substantiation requirements under Sections 110(A) and 113(A) and (B), 237, and 238 of the NIRC of 1997, as amended, in relation to Sections 4.110-1, 4.110-2, 4.110-8 and 4.113-1 of Revenue Regulations No. 16-05, as amended:

Exhibit	Findings	Amount
DD-4	Input tax on domestic purchase of goods supported by documents other than a VAT invoice	Php 91,016.62
DD-6	Input tax on domestic purchase of goods supported by a VAT invoice but not an original copy	530,628.77
DD-7	Input tax on domestic purchase of goods supported by a VAT invoice not issued in the name of the Petitioner. However, the corresponding supporting VAT ORs for these purchases were issued in the name of Petitioner.	1,776.43
DD-8	Input tax on domestic purchase of goods supported by a VAT Invoice issued in the name of CBK only. However, of this amount, Php29,543.78 are supported by VAT ORs issued in the name of CBK Power Co. Ltd, and Php6,638.46 are supported by VAT ORs issued in the name of CBK Power Company.	63,478.99
DD-9	Input tax on domestic purchase of goods supported by TIN sales invoice, TAN-VAT sales invoice with stamped/handwritten TIN number	24,507.43
DD-10	Domestic purchase of goods supported by a VAT invoice but without invoice date	259,347.57
DD-11	Input tax on domestic purchase of goods supported by a VAT invoice but not dated within the VAT-taxable year	6,066.05
DD-12	Input tax on domestic purchase of goods supported by a VAT invoice but is not BIR-registered	251,795.42
DD-16	Double claiming of input tax on domestic purchase of goods	623.44
DD-17	Input tax on domestic purchase of services supported by documents other than a VAT official receipt. These are either supported by a TIN VAT invoice, statement of account or provisional receipt.	355,672.92
DD-19	Input tax on domestic purchase of service supported by a VAT OR but not an original copy	2,898.90
DD-20	Input tax on domestic purchase of service supported by a VAT OR not issued in the name of Petitioner	2,357.24
DD-21	Input tax on domestic purchase of services supported by a VAT OR issued in the name of CBK only. However, of this amount, Php157,237.04 are also supported by VAT invoices and billing statements issued in the name of CBK Power Company Ltd., and Php516.79 are also supported by VAT	530,783.22

Exhibit	Findings	Amount
	invoices/statement of accounts issued in the name of CBK Power Co.	
DD-22	Input tax on domestic purchase of services supported by a TIN NV OR with stamped "TIN VAT"; Non VAT Reg TIN OR with stamped "TIN VAT" or "VAT registered"	392,274.26
DD-23	Input tax on domestic purchase of services supported by TIN OR only, OR only; OR with stamped TIN VAT; stamped TIN VAT OR	362,563.19
DD-24	Input tax on domestic purchase of service supported by a VAT OR but without OR date	14.09
DD-25	Input tax on domestic purchase of service supported by "ZERO-RATED" VAT OR	35,130.86
DD-26	Input tax on domestic purchase of service supported by a VAT OR not dated within the VAT-taxable year	7,444.33
DD-27	Input tax on domestic purchase of service supported by a VAT OR but is not BIR-registered	6,958.75
DD-28	Input tax on domestic purchase of service supported by a VAT OR with alterations in the date written in the OR without counter signature	65,699.18
DD-31	Double claiming of input VAT on domestic purchase of services	62.40
DD-32	Input tax on domestic purchase of service supported by a VAT OR. However, the sentence "This is not a source of input tax." is printed in the VAT OR.	96.00
DD-33	Input tax on importation of goods supported by documents other than an original copy of the IEIRD and BOC OR	1,022,183.00
DD-34	Input tax on importation of goods supported by an original copy of LBP OR and a PHOTOCOPY OF IEIRD	6,903,466.74
DD-35	Input tax on importation of goods supported by original copy of BOC/LBP OR ONLY without IEIRD	96,636.04
DD-37	Supporting documents not yet available	176,212.37
DD-38	Overclaimed input tax on domestic purchases of goods/services due to erroneous computation (i.e., arithmetical error)	27,120.54
DD-40	Overclaimed portion of input tax arising from forex rate used on foreign currency denominated purchases of goods and services	205,548.53
	Total	Php11,422,363.28

Further scrutiny of the suppliers' invoices and official receipts discloses that the following input VAT in the total amount of Php6,200,578.92 shall likewise be disallowed for failure to meet the substantiation requirements under the aforesaid VAT law and regulations:

Exhibit	Invoice/ O.R. No.	Date	Vendor	Disallowed Input VAT
<i>1. Input VAT not separately indicated in the invoice/official receipt</i>				
"CC-010014"	SXL-021732	18-Jan-07	Digital Tel. Phils., Inc.	61.91
"CC-010016"	SXL-021733	18-Jan-07	Digital Tel. Phils., Inc.	137.56
"CC-010018"	SXL-021734	18-Jan-07	Digital Tel. Phils., Inc.	494.25
"CC-010091"	000004234	19-Jan-07	Phil. Long Distance Tel. Co.	161.35
"CC-010093"	000004235	19-Jan-07	Phil. Long Distance Tel. Co.	404.92
"CC-010095"	000004236	19-Jan-07	Phil. Long Distance Tel. Co.	254.06
"CC-010099"	000004238	19-Jan-07	Phil. Long Distance Tel. Co.	373.03

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Exhibit	Invoice/ O.R. No.	Date	Vendor	Disallowed Input VAT
"CC-010101"	000004239	19-Jan-07	Phil. Long Distance Tel. Co.	292.02
"CC-010103"	000004240	19-Jan-07	Phil. Long Distance Tel. Co.	267.29
"CC-010105"	000004241	19-Jan-07	Phil. Long Distance Tel. Co.	358.04
"CC-010107"	000004242	19-Jan-07	Phil. Long Distance Tel. Co.	6,604.39
"CC-010109"	000005223	30-Jan-07	Phil. Long Distance Tel. Co.	3,375.60
"CC-010111"	000005335	31-Jan-07	Phil. Long Distance Tel. Co.	208.66
"CC-010113"	000005336	31-Jan-07	Phil. Long Distance Tel. Co.	139.76
"CC-010115"	000005337	31-Jan-07	Phil. Long Distance Tel. Co.	122.80
"CC-010117"	000005338	31-Jan-07	Phil. Long Distance Tel. Co.	357.15
"CC-010119"	000005339	31-Jan-07	Phil. Long Distance Tel. Co.	449.10
"CC-010121"	000005340	31-Jan-07	Phil. Long Distance Tel. Co.	228.90
"CC-010123"	000005341	31-Jan-07	Phil. Long Distance Tel. Co.	158.13
"CC-010125"	000005224	30-Jan-07	Phil. Long Distance Tel. Co.	864.00
"CC-010097"	000004237	19-Jan-07	Phil. Long Distance Tel. Co.	269.77
"CC-010079"	100849	2-Feb-07	Pagsanjan Rapids Hotel, Inc.	2,988.24
"CC-010088"	6055	25-Jan-07	Personal Security Systems, Inc.	20,442.74
"CC-010139"	143241	19-Jan-07	Tamaraw Security Service, Inc.	3,150.00
"CC-010141"	143251	22-Jan-07	Tamaraw Security Service, Inc.	88,418.03
"CC-010200"	5013122	7-Feb-07	Sycip Salazar Hernandez & Gatmaitan	52,096.18
"CC-010203"	5012498	9-Jan-07	Sycip Salazar Hernandez & Gatmaitan	50,953.92
"CC-010286"	000002737	9-Jan-07	Phil. Long Distance Tel. Co.	180.23
"CC-010284"	000002738	9-Jan-07	Phil. Long Distance Tel. Co.	339.89
"CC-010288"	000002739	9-Jan-07	Phil. Long Distance Tel. Co.	293.27
"CC-010290"	000002740	9-Jan-07	Phil. Long Distance Tel. Co.	163.84
"CC-010294"	000002742	9-Jan-07	Phil. Long Distance Tel. Co.	151.23
"CC-010296"	000002743	9-Jan-07	Phil. Long Distance Tel. Co.	122.80
"CC-010298"	000002744	9-Jan-07	Phil. Long Distance Tel. Co.	262.23
"CC-010302"	000002745	9-Jan-07	Phil. Long Distance Tel. Co.	284.63
"CC-010300"	000002746	9-Jan-07	Phil. Long Distance Tel. Co.	270.16
"CC-010304"	000002747	9-Jan-07	Phil. Long Distance Tel. Co.	212.13
"CC-010306"	000002748	9-Jan-07	Phil. Long Distance Tel. Co.	322.58
"CC-010308"	000002749	9-Jan-07	Phil. Long Distance Tel. Co.	260.30
"CC-010310"	000002750	9-Jan-07	Phil. Long Distance Tel. Co.	204.74
"CC-010312"	000002751	9-Jan-07	Phil. Long Distance Tel. Co.	157.03
"CC-010314"	000002752	9-Jan-07	Phil. Long Distance Tel. Co.	4,383.47
"CC-010316"	000002753	9-Jan-07	Phil. Long Distance Tel. Co.	3,375.60
"CC-010323"	0068	16-Jan-07	Rejoice Tyre Gallery & Auto Center	219.64
"CC-010292"	000002741	9-Jan-07	Phil. Long Distance Tel. Co.	287.47
"CC-010218"	1849	12-Jan-07	Counterflow Movers, Inc.	9,514.32
"CC-010231"	0343	12-Jan-07	Frontken Philippines, Inc.	480.00
"CC-010258"	71890	19-Jan-07	Intertek Testing Services Phils.	10,651.09
"CC-010260"	1438	20-Jan-07	K-Lite Systems Innovations, Inc.	1,178.57
"CC-010280"	0509	11-Jan-07	Nu-Print Philippines	2,250.00
"CC-010260"	100430	3-Jan-07	Pagsanjan Rapids Hotel, Inc.	1,599.10
"CC-010336"	143106	4-Jan-07	Tamaraw Security Service, Inc.	40,950.00
"CC-010338"	143158	6-Jan-07	Tamaraw Security Service, Inc.	88,451.75
"CC-010344"	118693	5-Jan-07	Toyota Batangas City, Inc.	52.80
"CC-010356"	13881	10-Jan-07	Welltech Service Corporation	375.00
"CC-010347"	118921	24-Jan-07	Toyota Batangas City, Inc.	91.20
"CC-010385"	TM17202	29-Jan-07	Toyota Makati, Inc.	122.40
"CC-010318"	17008	23-Feb-07	Rapide Auto Service Center	264.38
"CC-020016"	SXL-022789	16-Feb-07	Digital Tel. Phils., Inc.	61.53
"CC-020018"	SXL-022790	16-Feb-07	Digital Tel. Phils., Inc.	117.32
"CC-020021"	SXL-022791	16-Feb-07	Digital Tel. Phils., Inc.	326.89
"CC-020104"	000007648	22-Feb-07	Phil. Long Distance Tel. Co.	864.00
"CC-020112"	000007714	22-Feb-07	Phil. Long Distance Tel. Co.	148.38
"CC-020114"	000007715	22-Feb-07	Phil. Long Distance Tel. Co.	270.60
"CC-020116"	000007716	22-Feb-07	Phil. Long Distance Tel. Co.	128.69
"CC-020118"	000007717	22-Feb-07	Phil. Long Distance Tel. Co.	119.92
"CC-020120"	000007718	22-Feb-07	Phil. Long Distance Tel. Co.	343.50
"CC-020122"	000007719	22-Feb-07	Phil. Long Distance Tel. Co.	478.23
"CC-020124"	000007720	22-Feb-07	Phil. Long Distance Tel. Co.	526.09
"CC-020126"	000007721	22-Feb-07	Phil. Long Distance Tel. Co.	271.15

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Exhibit	Invoice/ O.R. No.	Date	Vendor	Disallowed Input VAT
"CC-020128"	000007722	22-Feb-07	Phil. Long Distance Tel. Co.	228.41
"CC-020130"	000007723	22-Feb-07	Phil. Long Distance Tel. Co.	405.36
"CC-020132"	000007724	22-Feb-07	Phil. Long Distance Tel. Co.	236.50
"CC-020134"	000007725	22-Feb-07	Phil. Long Distance Tel. Co.	172.15
"CC-020136"	000007726	22-Feb-07	Phil. Long Distance Tel. Co.	7,110.55
"CC-020106"	000007711	22-Feb-07	Phil. Long Distance Tel. Co.	133.03
"CC-020109"	000007712	22-Feb-07	Phil. Long Distance Tel. Co.	307.10
"CC-020110"	000007713	22-Feb-07	Phil. Long Distance Tel. Co.	239.80
"CC-020001"	74391	26-Mar-07	City Service Corporation	45,131.34
"CC-020014"	806003A	20-Feb-07	DHL Express (Philippines) Corp.	644.74
"CC-020032"	40801	2-Mar-07	Fujitsu Philippines, Inc.	7,476.00
"CC-020080"	14914	6-Mar-07	La Corona De Pagsanjan Resort	2,780.76
"CC-020184"	121270	23-Feb-07	Toyota Batangas City, Inc.	52.80
"CC-020080"	124101	26-Mar-07	Toyota Batangas City, Inc.	969.60
"CC-020191"	17288	1-Mar-07	Watson Wyatt Philippines, Inc.	300.00
"CC-020193"	116265	9-Feb-07	Airfreight 2100, Inc.	5.47
"CC-020197"	38880	15-Feb-07	Best Travel	52.61
"CC-020078"	46490	22-Feb-07	Intellicare	53.17
"CC-020060"	35470	23-Feb-07	Santos Telephone Corp.	235.71
"CC-020141"	17009	23-Feb-07	Rapide Auto Service Center	51.22
"CC-030009"	0006	19-Mar-07	Coledan Engineering	21,120.00
"CC-030153"	000010795	22-Mar-07	Phil. Long Distance Tel. Co.	195.82
"CC-030155"	000010796	22-Mar-07	Phil. Long Distance Tel. Co.	218.82
"CC-030157"	000010797	22-Mar-07	Phil. Long Distance Tel. Co.	130.23
"CC-030159"	000010798	22-Mar-07	Phil. Long Distance Tel. Co.	119.27
"CC-030161"	000010799	22-Mar-07	Phil. Long Distance Tel. Co.	776.83
"CC-030163"	000010807	22-Mar-07	Phil. Long Distance Tel. Co.	342.15
"CC-030165"	000010808	22-Mar-07	Phil. Long Distance Tel. Co.	521.04
"CC-030167"	000010800	22-Mar-07	Phil. Long Distance Tel. Co.	210.85
"CC-030169"	000010801	22-Mar-07	Phil. Long Distance Tel. Co.	289.97
"CC-030171"	000010802	22-Mar-07	Phil. Long Distance Tel. Co.	654.52
"CC-030173"	000010803	22-Mar-07	Phil. Long Distance Tel. Co.	285.22
"CC-030175"	000010804	22-Mar-07	Phil. Long Distance Tel. Co.	137.27
"CC-030177"	000010705	22-Mar-07	Phil. Long Distance Tel. Co.	864.00
"CC-030179"	000010616	21-Mar-07	Phil. Long Distance Tel. Co.	5,151.30
"CC-030183"	3293	23-Mar-07	Reign-Nan Sales Industry	42,000.00
"CC-030147"	000010792	22-Mar-07	Phil. Long Distance Tel. Co.	301.19
"CC-030149"	000010793	22-Mar-07	Phil. Long Distance Tel. Co.	309.27
"CC-030151"	000010794	22-Mar-07	Phil. Long Distance Tel. Co.	359.37
"CC-030007"	09909	26-Mar-07	Ben Calibration Service Center	203.57
"CC-030018"	008067	21-Mar-07	Digital Tel. Phils., Inc.	61.19
"CC-030020"	008068	21-Mar-07	Digital Tel. Phils., Inc.	107.43
"CC-030022"	008069	21-Mar-07	Digital Tel. Phils., Inc.	441.00
"CC-030137"	6374	29-Mar-07	Personal Security Systems, Inc.	40,931.88
"CC-030206"	143678	20-Mar-07	Tamaraw Security Service, Inc.	90,092.68
"CC-030212"	143677	27-Mar-07	Tamaraw Security Service, Inc.	90,047.65
"CC-030224"	6214	28-Mar-07	TCS Manpower Services, Inc.	25,568.35
"CC-030227"	124102	26-Mar-07	Toyota Batangas City, Inc.	158.40
"CC-030235"	39076	15-Mar-07	Best Travel	52.34
"CC-030291"	041412	21-Mar-07	Viking Cars, Incorporated	127.93
"CC-030244"	40861	19-Mar-07	Fujitsu Philippines, Inc.	81,875.11
"CC-030101"	48461	20-Mar-07	Intellicare	41.36
"CC-030099"	47240	28-Mar-07	Intellicare	82.71
"CC-030014"	16436	12-Apr-07	Copy Quest Corporation	8,928.00
"CC-030089"	4088	11-Apr-07	Hearth & Hastings Phils., Inc.	2,475.00
"CC-030185"	0085	2-Apr-07	Rejoice Tyre Gallery & Auto Center	133.93
"CC-030188"	0086	2-Apr-07	Rejoice Tyre Gallery & Auto Center	37.50
"CC-040014"	SXL-024701	18-Apr-07	Digital Tel. Phils., Inc.	60.55
"CC-040018"	SXL-024703	18-Apr-07	Digital Tel. Phils., Inc.	341.77
"CC-040104"	000014105	25-Apr-07	Phil. Long Distance Tel. Co.	3,375.60
"CC-040106"	000014104	25-Apr-07	Phil. Long Distance Tel. Co.	864.00
"CC-040108"	000014106	25-Apr-07	Phil. Long Distance Tel. Co.	139.40
"CC-040110"	000014107	25-Apr-07	Phil. Long Distance Tel. Co.	572.06

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Exhibit	Invoice/ O.R. No.	Date	Vendor	Disallowed Input VAT
"CC-040112"	000014123	25-Apr-07	Phil. Long Distance Tel. Co.	315.32
"CC-040114"	000014108	25-Apr-07	Phil. Long Distance Tel. Co.	205.56
"CC-040116"	000014109	25-Apr-07	Phil. Long Distance Tel. Co.	184.02
"CC-040118"	000014110	25-Apr-07	Phil. Long Distance Tel. Co.	133.47
"CC-040120"	000014111	25-Apr-07	Phil. Long Distance Tel. Co.	118.15
"CC-040122"	000014112	25-Apr-07	Phil. Long Distance Tel. Co.	563.02
"CC-040124"	000014113	25-Apr-07	Phil. Long Distance Tel. Co.	548.96
"CC-040126"	000014114	25-Apr-07	Phil. Long Distance Tel. Co.	723.37
"CC-040128"	000014115	25-Apr-07	Phil. Long Distance Tel. Co.	232.83
"CC-040130"	000014116	25-Apr-07	Phil. Long Distance Tel. Co.	450.63
"CC-040132"	000014117	25-Apr-07	Phil. Long Distance Tel. Co.	583.11
"CC-040134"	000014118	25-Apr-07	Phil. Long Distance Tel. Co.	257.68
"CC-040136"	000014119	25-Apr-07	Phil. Long Distance Tel. Co.	145.98
"CC-040138"	000014120	25-Apr-07	Phil. Long Distance Tel. Co.	7,936.91
"CC-040002"	3697	15-May-07	Berkman Systems, Inc.	10,440.00
"CC-040004"	75546	16-May-07	City Service Corporation	46,152.96
"CC-040026"	126515	10-May-07	Functional Inc.	234.65
"CC-040045"	47941	18-Apr-07	High Grip Auto Center	85.71
"CC-040071"	0402	8-May-07	Marvelous Bodyguards & Defenders Security Agency	16,860.84
"CC-040092"	13933	23-Apr-07	Neville-Clarke Philippines, Inc.	1,680.00
"CC-040095"	102002	30-Apr-07	Pagsanjan Rapids Hotel, Inc.	3,499.89
"CC-040097"	29807	10-May-07	Palmer-Asia, Inc.	5,943.30
"CC-040140"	1304	27-Apr-07	Questronix Corporation	2,400.00
"CC-040142"	0088	20-Apr-07	Rejoice Tyre Gallery & Auto Center	278.57
"CC-040144"	0686	19-Apr-07	Rizalnet Enterprises	306.43
"CC-040156"	69099	18-Apr-07	SFM Sales Corporation	244.28
"CC-040159"	69098	18-Apr-07	SFM Sales Corporation	85.71
"CC-040162"	143919	24-Apr-07	Tamaraw Security Service, Inc.	17,550.00
"CC-040174"	124362	18-Apr-07	Toyota Batangas City, Inc.	66.00
"CC-040178"	0249	11-May-07	Water-Lite Engineering	1,821.43
"CC-040180"	121778	13-Apr-07	Airfreight 2100, Inc.	11.74
"CC-040186"	127271	15-May-07	Airfreight 2100, Inc.	17.46
"CC-040190"	121795	20-Apr-07	Airfreight 2100, Inc.	8.08
"CC-040245"	22	12-Apr-07	Tai Chi Hui	119,520.00
"CC-040247"	29123	29-May-07	Toyota Makati, Inc.	114.00
"CC-040249"	28996	22-May-07	Toyota Makati, Inc.	168.00
"CC-040052"	50213	8-May-07	Intellicare	164.03
"CC-040058"	15091	3-May-07	La Corona De Pagsanjan Resort	2,441.04
"CC-040060"	15092	3-May-07	La Corona De Pagsanjan Resort	510.00
"CC-040152"	35861	25-Apr-07	Santos Telephone Corp.	235.71
"CC-040204"	40962	19-Apr-07	Fujitsu Philippines, Inc.	20,483.01
"CC-040244"	34636	17-Apr-07	Marsh Philippines, Inc.	875,610.00
"CC-050011"	SXL-025922	22-May-07	Digital Tel. Phils., Inc.	59.86
"CC-050015"	SXL-025924	3-May-07	Digital Tel. Phils., Inc.	384.30
"CC-050151"	000018088	8-Jun-07	Phil. Long Distance Tel. Co.	156.94
"CC-050153"	000018089	8-Jun-07	Phil. Long Distance Tel. Co.	257.14
"CC-050155"	000018090	8-Jun-07	Phil. Long Distance Tel. Co.	120.87
"CC-050157"	000018091	8-Jun-07	Phil. Long Distance Tel. Co.	119.77
"CC-050159"	000018092	8-Jun-07	Phil. Long Distance Tel. Co.	440.20
"CC-050161"	000018093	8-Jun-07	Phil. Long Distance Tel. Co.	432.16
"CC-050163"	000018094	8-Jun-07	Phil. Long Distance Tel. Co.	493.32
"CC-050165"	000018095	8-Jun-07	Phil. Long Distance Tel. Co.	173.93
"CC-050167"	000018096	8-Jun-07	Phil. Long Distance Tel. Co.	448.45
"CC-050169"	000018097	8-Jun-07	Phil. Long Distance Tel. Co.	435.60
"CC-050171"	000018098	8-Jun-07	Phil. Long Distance Tel. Co.	234.74
"CC-050173"	000018099	8-Jun-07	Phil. Long Distance Tel. Co.	143.77
"CC-050175"	000018100	8-Jun-07	Phil. Long Distance Tel. Co.	5,368.85
"CC-050177"	000017993	8-Jun-07	Phil. Long Distance Tel. Co.	3,375.60
"CC-050179"	000017994	8-Jun-07	Phil. Long Distance Tel. Co.	864.00
"CC-050292"	84157	8-Jun-07	PLDT	3,593.29
"CC-050145"	000018085	8-Jun-07	Phil. Long Distance Tel. Co.	143.96
"CC-050147"	000018086	8-Jun-07	Phil. Long Distance Tel. Co.	396.93

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Exhibit	Invoice/ O.R. No.	Date	Vendor	Disallowed Input VAT
"CC-050149"	000018087	8-Jun-07	Phil. Long Distance Tel. Co.	209.42
"CC-050008"	017646	5-Jun-07	Copy Quest Corporation	6,696.00
"CC-050024"	0305	7-Jun-07	Eastern Aluminum Glass Supply	1,339.28
"CC-050028"	2497	8-Jun-07	Enclosure Systems Specialists, Inc.	44,999.98
"CC-050098"	15174	7-Jun-07	La Corona De Pagsanjan Resort	5,892.86
"CC-050101"	15175	7-Jun-07	La Corona De Pagsanjan Resort	1,283.04
"CC-050103"	15455	18-Jun-07	La Corona De Pagsanjan Resort	11,785.72
"CC-050349"	3745	17-May-07	Motorworld Sales Center	889.29
"CC-050126"	4205	24-May-07	Newton Elect. Equipt. Co., Inc.	9,996.00
"CC-050130"	6580	29-May-07	Personal Security Systems, Inc.	41,107.40
"CC-050135"	6658	8-Jun-07	Personal Security Systems, Inc.	41,901.26
"CC-050140"	6708	21-Jun-07	Personal Security Systems, Inc.	41,988.96
"CC-050214"	131508	4-Jun-07	Airfreight 2100, Inc.	5.27
"CC-050216"	131535	12-Jun-07	Airfreight 2100, Inc.	10.36
"CC-050227"	39445	11-May-07	Best Travel	51.05
"CC-050229"	368401	10-May-07	Universal Holidays, Inc.	102.11
"CC-050231"	39444	11-May-07	Best Travel	51.05
"CC-050303"	29829	18-Jul-07	Toyota Makati, Inc.	28.80
"CC-050096"	50768	18-May-07	Intellicare	39.39
"CC-050186"	36260	25-May-07	Santos Telephone Corp.	235.71
"CC-050196"	144178	28-May-07	Tamaraw Security Service, Inc.	86,246.22
"CC-050240"	0362	7-May-07	Control Risk	30,743.06
"CC-050242"	0371	31-May-07	Control Risks Group Philippines, Inc.	29,982.31
"CC-050108"	0017	7-Jul-07	Lino Bon Artiaga Customs Brokerage	1,542.00
"CC-060011"	SXL-027194	25-Jun-07	Digital Tel. Phils., Inc.	59.56
"CC-060015"	SXL-027196	25-Jun-07	Digital Tel. Phils., Inc.	296.15
"CC-060111"	1899	21-Jun-07	New Horizons Computer Learning Centers	1,189.29
"CC-060126"	000020009	25-Jun-07	Phil. Long Distance Tel. Co.	3,375.60
"CC-060128"	000020008	25-Jun-07	Phil. Long Distance Tel. Co.	864.00
"CC-060130"	000020010	25-Jun-07	Phil. Long Distance Tel. Co.	139.83
"CC-060132"	000020011	25-Jun-07	Phil. Long Distance Tel. Co.	379.11
"CC-060134"	000020012	25-Jun-07	Phil. Long Distance Tel. Co.	231.46
"CC-060136"	000020013	25-Jun-07	Phil. Long Distance Tel. Co.	205.60
"CC-060139"	000020014	25-Jun-07	Phil. Long Distance Tel. Co.	265.31
"CC-060141"	000020015	25-Jun-07	Phil. Long Distance Tel. Co.	120.87
"CC-060143"	000020016	25-Jun-07	Phil. Long Distance Tel. Co.	119.77
"CC-060145"	000020017	25-Jun-07	Phil. Long Distance Tel. Co.	551.95
"CC-060147"	000020018	25-Jun-07	Phil. Long Distance Tel. Co.	638.47
"CC-060149"	000020019	25-Jun-07	Phil. Long Distance Tel. Co.	526.61
"CC-060151"	000020020	25-Jun-07	Phil. Long Distance Tel. Co.	137.77
"CC-060153"	000020021	25-Jun-07	Phil. Long Distance Tel. Co.	463.48
"CC-060155"	000020022	25-Jun-07	Phil. Long Distance Tel. Co.	588.02
"CC-060157"	000020023	25-Jun-07	Phil. Long Distance Tel. Co.	248.15
"CC-060159"	000020024	25-Jun-07	Phil. Long Distance Tel. Co.	228.57
"CC-060161"	000020025	25-Jun-07	Phil. Long Distance Tel. Co.	5,964.28
"CC-060236"	0207	14-Jun-07	Twin V Tech Systems & Serv.	10,714.28
"CC-060447"	0517	26-Jun-07	Vegas Marketing	3,543.75
"CC-060446"	16566	8-Jun-07	Uniwel Tech. Corporation	38,057.14
"CC-060337"	1631	30-May-07	Isotrust Trading Company	17,977.50
"CC-060001"	0611	16-Jun-07	Aero Med Ambulance Transport, Inc.	960.00
"CC-060064"	342	14-Jun-07	Harty Incorporated Phils.	52,232.14
"CC-060066"	4163	14-Jun-07	Hearth & Hastings Phils., Inc.	2,475.00
"CC-060099"	49674	25-Jun-07	Microbase Incorporated	13,928.57
"CC-060105"	2670	15-Jun-07	Mr. Bugmaster, Inc.	1,714.29
"CC-060120"	102472	20-Jun-07	Pagsanjan Rapids Hotel, Inc.	6,781.16
"CC-060124"	3443	26-Jun-07	Pinnacle Parts Co., Inc.	355.71
"CC-060163"	3485	20-Jun-07	Ramp Insurance Services	8,725.63
"CC-060165"	0097	20-Jun-07	Rejoice Tyre Gallery & Auto Center	471.43
"CC-060207"	14404	26-Jun-07	Tamaraw Security Service, Inc.	90,047.65
"CC-060213"	14405	28-Jun-07	Tamaraw Security Service, Inc.	90,092.69
"CC-060225"	6407	28-Jun-07	TCS Manpower Services, Inc.	25,944.37
"CC-060228"	6408	28-Jun-07	TCS Manpower Services, Inc.	28,198.98
"CC-060244"	0279	19-Jun-07	Water-Lite Engineering	51,428.57

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Exhibit	Invoice/ O.R. No.	Date	Vendor	Disallowed Input VAT
"CC-060251"	133234	25-Jun-07	Airfreight 2100, Inc.	5.16
"CC-060184"	36485	26-Jun-07	Santos Telephone Corp.	235.71
"CC-060201"	144179	14-Jun-07	Tamaraw Security Service, Inc.	86,328.57
"CC-060031"	57252	16-Jul-07	Fuji Xerox Philippines, Inc.	613.26
"CC-060062"	2188	20-Jul-07	Government Performance Magazine	1,060.71
"CC-060081"	75002	3-Jul-07	Intertek Testing Services Phils.	10,440.00
"CC-060083"	1548	26-Jul-07	Jnkons Enterprise	1,395.00
"CC-060085"	10359	3-Jul-07	KPI Elevators, Inc.	7,519.42
"CC-060113"	2009	6-Jul-07	New Horizons Computer Learning Centers	792.86
"CC-060115"	2646	5-Jul-07	Nu-Print Philippines	496.46
"CC-060168"	0100	3-Jul-07	Rejoice Tyre Gallery & Auto Center	64.29
"CC-060194"	69727	6-Jul-07	SFM Sales Corporation	106.07
"CC-060219"	144406	5-Jul-07	Tamaraw Security Service, Inc.	964.29
"CC-060231"	136096	31-Jul-07	Toyota Batangas City, Inc.	396.00
"CC-060249"	136329	16-Jul-07	Airfreight 2100, Inc.	6.11
"CC-060288"	804	19-Jul-07	Rizalnet Enterprises	132.72
"CC-060291"	384	16-Jul-07	Supermax Janitorial & General Services, Inc.	540.00
"CC-060295"	676	16-Jul-07	Tantoco Villanueva De Guzman & Llamas Law Offices	4,980.00
"CC-060297"	29828	18-Jul-07	Toyota Makati, Inc.	114.00
"CC-060300"	29817	18-Jul-07	Toyota Makati, Inc.	114.00
"CC-060029"	57253	16-Jul-07	Fuji Xerox Philippines, Inc.	880.32
"CC-070049"	1592	18-May-07	Kcomm Network Systems Corporation	1,800.00
"CC-070049"	361834	25-May-07	U-Freight Philippines, Inc.	108.00
"CC-090013"	454	11-Oct-07	C.S. Bracamonte	1,664.52
"CC-090029"	61652	10-Oct-07	Fuji Xerox Philippines, Inc.	105.78
"CC-090070"	2281	8-Oct-07	Interlink Business Solutions, Inc.	6,480.00
"CC-090074"	127472	3-Oct-07	Kuehne + Nagel, Inc.	1,621.87
"CC-090080"	0037	10-Oct-07	Lino Bon Artiaga Customs Brokerage	1,080.00
"CC-090214"	145106	5-Oct-07	Tamaraw Security Service, Inc.	88,066.08
"CC-090195"	138981	11-Oct-07	Toyota Batangas City, Inc.	114.00
"CC-090230"	40321	3-Oct-07	Best Travel	48.75
"CC-090076"	15742	3-Oct-07	La Corona De Pagsanjan Resort	899.58
"CC-090278"	384554	26-Oct-07	Universal Holidays, Inc.	97.50
"CC-090272"	722	19-Oct-07	Tantoco Villanueva De Guzman & Llamas Law Offices	3,619.20
"CC-100138"	56587	10-Sep-07	PCIC Container Freight Station, Inc.	1,429.30
"CC-070055"	95230	11-Jul-07	Philippine Long Distance Telephone	3,062.64
"CC-070061"	101057	30-Jul-07	Philippine Long Distance Telephone	3,618.88
"CC-070097"	SXL-027809	13-Jul-07	Digital Tel. Phils., Inc.	59.24
"CC-070101"	SXL-027811	13-Jul-07	Digital Tel. Phils., Inc.	362.19
"CC-070117"	59321	13-Aug-07	Fuji Xerox Philippines, Inc.	125.88
"CC-070245"	000022022	18-Jul-07	Phil. Long Distance Tel. Co.	148.48
"CC-070247"	000022023	18-Jul-07	Phil. Long Distance Tel. Co.	367.55
"CC-070249"	000022024	18-Jul-07	Phil. Long Distance Tel. Co.	319.62
"CC-070251"	000022025	18-Jul-07	Phil. Long Distance Tel. Co.	170.09
"CC-070253"	000022026	18-Jul-07	Phil. Long Distance Tel. Co.	293.99
"CC-070255"	000022027	18-Jul-07	Phil. Long Distance Tel. Co.	117.63
"CC-070257"	000022028	18-Jul-07	Phil. Long Distance Tel. Co.	116.53
"CC-070259"	000022029	18-Jul-07	Phil. Long Distance Tel. Co.	541.61
"CC-070261"	000022030	18-Jul-07	Phil. Long Distance Tel. Co.	465.28
"CC-070263"	000022039	18-Jul-07	Phil. Long Distance Tel. Co.	744.57
"CC-070265"	000022031	18-Jul-07	Phil. Long Distance Tel. Co.	140.87
"CC-070267"	000022032	18-Jul-07	Phil. Long Distance Tel. Co.	483.38
"CC-070269"	000022033	18-Jul-07	Phil. Long Distance Tel. Co.	615.83
"CC-070271"	000022034	18-Jul-07	Phil. Long Distance Tel. Co.	230.19
"CC-070273"	000022035	18-Jul-07	Phil. Long Distance Tel. Co.	298.19
"CC-070275"	000022036	18-Jul-07	Phil. Long Distance Tel. Co.	7,317.91
"CC-070277"	000022004	18-Jul-07	Phil. Long Distance Tel. Co.	864.00
"CC-070001"	136328	16-Jul-07	Airfreight 2100, Inc.	5.16
"CC-070003"	136327	16-Jul-07	Airfreight 2100, Inc.	7.75
"CC-070005"	140801	7-Aug-07	Airfreight 2100, Inc.	5.06
"CC-070007"	137935	27-Jul-07	Airfreight 2100, Inc.	8.42

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Exhibit	Invoice/ O.R. No.	Date	Vendor	Disallowed Input VAT
"CC-070017"	39957	31-Jul-07	Best Travel	48.64
"CC-070019"	39956	31-Jul-07	Best Travel	48.64
"CC-070023"	020299	9-Aug-07	Ecopy Corporation	490.93
"CC-070051"	9144	16-Jul-07	Manabat Delgado Amper & Co.	19,800.00
"CC-070074"	687	26-Jul-07	Tantoco Villanueva De Guzman & Llamas Law Offices	2,190.00
"CC-070076"	30252	17-Aug-07	Toyota Makati, Inc.	159.00
"CC-070080"	30253	17-Aug-07	Toyota Makati, Inc.	189.00
"CC-070084"	373981	31-Jul-07	Universal Holidays, Inc.	97.29
"CC-070431"	2930	8-Aug-07	High Grip Auto Center	128.57
"CC-070438"	374761	2-Aug-07	Integrated Computer Systems, Inc.	276.00
"CC-070184"	0025	30-Jul-07	Lino Bon Artiaga Customs Brokerage	12,125.61
"CC-070197"	0415	3-Aug-07	Marvelous Bodyguards & Defenders Security Agency	15,463.80
"CC-070212"	3836	2-Aug-07	Motorworld Sales Center	2,357.14
"CC-070214"	2736	10-Aug-07	Mr. Bugmaster, Inc.	1,714.29
"CC-070236"	102767	19-Jul-07	Pagsanjan Rapids Hotel, Inc.	1,787.56
"CC-070238"	102989	6-Aug-07	Pagsanjan Rapids Hotel, Inc.	2,907.23
"CC-070286"	0105	6-Aug-07	Rejoice Tyre Gallery & Auto Center	428.57
"CC-070334"	144672	27-Jul-07	Tamaraw Security Service, Inc.	89,856.25
"CC-070340"	144737	6-Aug-07	Tamaraw Security Service, Inc.	16,300.20
"CC-070346"	6501	17-Jul-07	TCS Manpower Services, Inc.	26,292.81
"CC-070349"	6502	17-Jul-07	TCS Manpower Services, Inc.	26,777.58
"CC-070352"	6559	3-Aug-07	TCS Manpower Services, Inc.	27,704.19
"CC-070355"	136097	31-Jul-07	Toyota Batangas City, Inc.	91.20
"CC-070357"	136139	2-Aug-07	Toyota Batangas City, Inc.	1,374.00
"CC-070360"	136441	29-Aug-07	Toyota Batangas City, Inc.	180.00
"CC-070176"	56646	20-Sep-07	Intellicare	861.70
"CC-070053"	35014	31-Jul-07	Marsh Philippines, Inc.	826,398.00
"CC-070021"	0384	10-Jul-07	Control Risks Group Philippines, Inc.	29,757.46
"CC-070306"	36671	24-Jul-07	Santos Telephone Corp.	235.71
"CC-080007"	SXL-028683	8-Aug-07	Digital Tel. Phils., Inc.	58.11
"CC-080009"	SXL-028684	8-Aug-07	Digital Tel. Phils., Inc.	333.55
"CC-080024"	65900	29-Aug-07	General Electric Phils., Inc.	109,795.44
"CC-080104"	000024408	15-Aug-07	Phil. Long Distance Tel. Co.	216.49
"CC-080108"	000024410	15-Aug-07	Phil. Long Distance Tel. Co.	142.56
"CC-080110"	000024411	15-Aug-07	Phil. Long Distance Tel. Co.	118.47
"CC-080112"	000024412	15-Aug-07	Phil. Long Distance Tel. Co.	522.78
"CC-080114"	000024413	15-Aug-07	Phil. Long Distance Tel. Co.	476.71
"CC-080116"	000024414	15-Aug-07	Phil. Long Distance Tel. Co.	1,038.14
"CC-080118"	000024415	15-Aug-07	Phil. Long Distance Tel. Co.	147.39
"CC-080120"	000024416	15-Aug-07	Phil. Long Distance Tel. Co.	357.96
"CC-080122"	000024417	15-Aug-07	Phil. Long Distance Tel. Co.	564.03
"CC-080124"	000024418	15-Aug-07	Phil. Long Distance Tel. Co.	213.01
"CC-080126"	000024419	15-Aug-07	Phil. Long Distance Tel. Co.	146.56
"CC-080128"	000024420	15-Aug-07	Phil. Long Distance Tel. Co.	8,402.86
"CC-080130"	000024005	13-Aug-07	Phil. Long Distance Tel. Co.	864.00
"CC-080239"	95485	14-Sep-07	Punongbayan & Araullo	1,200.00
"CC-080241"	95484	14-Sep-07	Punongbayan & Araullo	1,200.00
"CC-080098"	000024405	15-Aug-07	Phil. Long Distance Tel. Co.	133.85
"CC-080100"	000024406	15-Aug-07	Phil. Long Distance Tel. Co.	473.02
"CC-080102"	000024407	15-Aug-07	Phil. Long Distance Tel. Co.	244.31
"CC-080106"	000024405	15-Aug-07	Phil. Long Distance Tel. Co.	308.67
"CC-080003"	40172	6-Sep-07	Best Travel	26.79
"CC-080005"	1456	24-Aug-07	Control & Analytical Lab., Inc.	4,320.00
"CC-080022"	59983	3-Sep-07	Fuji Xerox Philippines, Inc.	60.48
"CC-080076"	2227	24-Aug-07	Mega Masterlink Fabricator & Elect. Serv. Corp.	5,976.00
"CC-080080"	4496	7-Sep-07	Mercer Human Resource Consulting, Inc.	9,600.00
"CC-080159"	144818	3-Sep-07	Tamaraw Security Service, Inc.	88,002.75
"CC-080164"	6525	16-Aug-07	TCS Manpower Services, Inc.	26,950.89
"CC-080167"	6545	31-Aug-07	TCS Manpower Services, Inc.	19,525.27
"CC-080170"	6070	13-Sep-07	TCS Manpower Services, Inc.	6,831.68
"CC-080172"	6071	13-Sep-07	TCS Manpower Services, Inc.	27,350.80

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Exhibit	Invoice/ O.R. No.	Date	Vendor	Disallowed Input VAT
"CC-080175"	136442	29-Aug-07	Toyota Batangas City, Inc.	66.00
"CC-080196"	140835	22-Aug-07	Airfreight 2100, Inc.	7.59
"CC-080198"	143273	4-Sep-07	Airfreight 2100, Inc.	14.26
"CC-080200"	143274	4-Sep-07	Airfreight 2100, Inc.	13.41
"CC-080203"	0282	7-Sep-07	Amado A. Blanco, Jr.	4,500.00
"CC-080209"	40171	6-Sep-07	Best Travel	50.41
"CC-080250"	709	12-Sep-07	Tantoco Villanueva De Guzman & Llamas Law Offices	3,360.00
"CC-080252"	30482	7-Sep-07	Toyota Makati, Inc.	863.57
"CC-080254"	376461	23-Aug-07	Universal Holidays, Inc.	97.61
"CC-080256"	376460	23-Aug-07	Universal Holidays, Inc.	97.61
"CC-080262"	04627	25-Aug-07	Viking Cars, Incorporated	785.36
"CC-080211"	65955	16-Aug-07	General Electric Phils., Inc.	123,698.42
"CC-090015"	SXL-029562	12-Sep-07	Digital Tel. Phils., Inc.	57.83
"CC-090019"	SXL-029564	12-Sep-07	Digital Tel. Phils., Inc.	416.95
"CC-090124"	000028480	25-Sep-07	Phil. Long Distance Tel. Co.	864.00
"CC-090129"	000028519	26-Sep-07	Phil. Long Distance Tel. Co.	449.58
"CC-090131"	000028520	26-Sep-07	Phil. Long Distance Tel. Co.	245.79
"CC-090133"	000028521	26-Sep-07	Phil. Long Distance Tel. Co.	274.04
"CC-090135"	000028522	26-Sep-07	Phil. Long Distance Tel. Co.	222.07
"CC-090137"	000028523	26-Sep-07	Phil. Long Distance Tel. Co.	118.47
"CC-090139"	000028524	26-Sep-07	Phil. Long Distance Tel. Co.	118.47
"CC-090141"	000028525	26-Sep-07	Phil. Long Distance Tel. Co.	588.01
"CC-090143"	000028526	26-Sep-07	Phil. Long Distance Tel. Co.	574.81
"CC-090145"	000028527	26-Sep-07	Phil. Long Distance Tel. Co.	1,232.78
"CC-090147"	000028528	26-Sep-07	Phil. Long Distance Tel. Co.	137.97
"CC-090149"	000028529	26-Sep-07	Phil. Long Distance Tel. Co.	443.93
"CC-090151"	000028530	26-Sep-07	Phil. Long Distance Tel. Co.	855.91
"CC-090153"	000028531	26-Sep-07	Phil. Long Distance Tel. Co.	320.13
"CC-090155"	000028532	26-Sep-07	Phil. Long Distance Tel. Co.	151.47
"CC-090157"	000028533	26-Sep-07	Phil. Long Distance Tel. Co.	8,306.97
"CC-090127"	000028518	26-Sep-07	Phil. Long Distance Tel. Co.	137.09
"CC-090011"	2086	19-Sep-07	Counterflow Movers, Inc.	2,171.79
"CC-090078"	0035	20-Sep-07	Lino Bon Artiaga Customs Brokerage	11,291.23
"CC-090105"	50511	19-Sep-07	Microbase Incorporated	1,641.00
"CC-090114"	27921	14-Aug-07	Orient Freight International, Inc.	32.14
"CC-090116"	103368	18-Sep-07	Pagsanjan Rapids Hotel, Inc.	434.21
"CC-090159"	95486	14-Sep-07	Punongbayan & Araullo	564.00
"CC-090161"	012	28-Sep-07	Qualityworks Consultancy Corp.	3,857.14
"CC-090179"	37223	25-Sep-07	Santos Telephone Corp.	235.71
"CC-090224"	6597	21-Sep-07	TCS Manpower Services, Inc.	27,857.57
"CC-090205"	0179	26-Sep-07	Wellcross Freight Corp.	2,176.27
"CC-090203"	0180	26-Sep-07	Wellcross Freight Corp.	5,788.30
"CC-090208"	14919	28-Sep-07	Welltech Service Corporation	696.43
"CC-090227"	40287	28-Sep-07	Best Travel	49.93
"CC-090246"	387	25-Sep-07	Harty Incorporated Phils.	177,535.72
"CC-100018"	SXL-030674	10-Nov-07	Digital Tel. Phils., Inc.	61.89
"CC-100022"	SXL-030676	10-Nov-07	Digital Tel. Phils., Inc.	345.76
"CC-100025"	SXL-031490	13-Nov-07	Digital Tel. Phils., Inc.	61.89
"CC-100029"	SXL-031492	13-Nov-07	Digital Tel. Phils., Inc.	324.95
"CC-100065"	0593	6-Nov-07	Homeguard Strategist Co.	428.57
"CC-100100"	3702	11-Oct-07	Masigasig Security & Manpower Agency, Inc.	86,289.56
"CC-100105"	3705	24-Oct-07	Masigasig Security & Manpower Agency, Inc.	86,256.26
"CC-100110"	3707	5-Nov-07	Masigasig Security & Manpower Agency, Inc.	86,397.83
"CC-100147"	000030471	17-Oct-07	Phil. Long Distance Tel. Co.	864.00
"CC-100150"	000031268	24-Oct-07	Phil. Long Distance Tel. Co.	150.57
"CC-100152"	000031269	24-Oct-07	Phil. Long Distance Tel. Co.	294.96
"CC-100154"	000031270	24-Oct-07	Phil. Long Distance Tel. Co.	293.63
"CC-100156"	000031271	24-Oct-07	Phil. Long Distance Tel. Co.	190.02
"CC-100158"	000031272	24-Oct-07	Phil. Long Distance Tel. Co.	264.09
"CC-100160"	000031273	24-Oct-07	Phil. Long Distance Tel. Co.	138.29
"CC-100162"	000031274	24-Oct-07	Phil. Long Distance Tel. Co.	107.69
"CC-100164"	000031275	24-Oct-07	Phil. Long Distance Tel. Co.	311.99

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Exhibit	Invoice/ O.R. No.	Date	Vendor	Disallowed Input VAT
"CC-100166"	000031276	24-Oct-07	Phil. Long Distance Tel. Co.	523.99
"CC-100168"	000031277	24-Oct-07	Phil. Long Distance Tel. Co.	1,492.76
"CC-100172"	000031279	24-Oct-07	Phil. Long Distance Tel. Co.	313.72
"CC-100174"	000031280	24-Oct-07	Phil. Long Distance Tel. Co.	650.47
"CC-100176"	000031281	24-Oct-07	Phil. Long Distance Tel. Co.	183.15
"CC-100180"	000031283	24-Oct-07	Phil. Long Distance Tel. Co.	7,879.47
"CC-100007"	40439	30-Oct-07	Best Travel	47.46
"CC-100009"	40448	30-Oct-07	Best Travel	427.14
"CC-100013"	1175	16-Nov-07	Control & Analytical Lab., Inc.	3,618.00
"CC-100015"	468	16-Nov-07	C.S. Bracamonte	1,816.17
"CC-100037"	33694	20-Nov-07	First Analytical Serv. & Tech. Coop.	10,166.40
"CC-100063"	348	5-Nov-07	Harty Incorporated Phils.	52,232.14
"CC-100084"	0044	16-Nov-07	Lino Bon Artiaga Customs Brokerage	12,259.62
"CC-100117"	0288	30-Oct-07	Metro Meter Office Furniture Trading	6,116.24
"CC-100120"	0905	16-Nov-07	Mich-cel Motors	4,320.00
"CC-100124"	2882	17-Nov-07	Mr. Bugmaster, Inc.	1,714.28
"CC-100184"	0113	16-Oct-07	Rejoice Tyre Gallery & Auto Center	171.43
"CC-100187"	0116	9-Nov-07	Rejoice Tyre Gallery & Auto Center	96.43
"CC-100209"	0074	9-Nov-07	Sards Construction	33,600.00
"CC-100213"	20093	8-Nov-07	Stellite Commercial, Inc.	144.11
"CC-100209"	6763	9-Nov-07	TCS Manpower Services, Inc.	26,419.41
"CC-100218"	140756	5-Nov-07	Toyota Batangas City, Inc.	48.00
"CC-100220"	47276	16-Nov-07	Transmodal International, Inc.	592.78
"CC-100223"	154748	22-Oct-07	Tricom Dynamics, Inc.	4,516.17
"CC-100241"	14991	19-Oct-07	Welltech Service Corporation	4,200.00
"CC-100245"	15109	9-Nov-07	Welltech Service Corporation	1,767.86
"CC-100247"	0079	30-Oct-07	Worldbest Logistics Phils., Inc.	1,956.27
"CC-100253"	150794	5-Nov-07	Airfreight 2100, Inc.	7.60
"CC-100274"	4716	19-Oct-07	Centerlane Car Rental Services	3,261.84
"CC-100303"	9268	19-Oct-07	Manabat Delgado Amper & Co.	11,880.00
"CC-100325"	31225	30-Oct-07	Toyota Makati, Inc.	175.80
"CC-100328"	31224	30-Oct-07	Toyota Makati, Inc.	114.00
"CC-100330"	31599	22-Nov-07	Toyota Makati, Inc.	48.00
"CC-100332"	384525	26-Oct-07	Universal Holidays, Inc.	96.86
"CC-100086"	0042	9-Nov-07	Lino Bon Artiaga Customs Brokerage	2,848.59
"CC-100067"	58503	31-Oct-07	Intellicare	248.24
"CC-100071"	15788	16-Oct-07	La Corona De Pagsanjan Resort	2,129.82
"CC-100076"	15836	31-Oct-07	La Corona De Pagsanjan Resort	1,013.10
"CC-100072"	15835	31-Oct-07	La Corona De Pagsanjan Resort	901.02
"CC-100074"	15880	9-Nov-07	La Corona De Pagsanjan Resort	1,467.05
"CC-100239"	504	9-Nov-07	Wellcross Freight Corp.	7,857.78
"CC-100197"	37416	25-Oct-07	Santos Telephone Corp.	235.71
"CC-100323"	0725	9-Nov-07	Tantoco Villanueva De Guzman & Llamas Law Offices	10,747.20
"CC-100450"	55963	11-Oct-07	Hermaco Commercial	6,489.64
"CC-110103"	20308	6-Dec-07	Lagos Del Sol Resort Hotel, Inc.	14,345.42
"CC-110116"	3698	20-Nov-07	Masigasig Security & Manpower Agency, Inc.	86,375.62
"CC-110142"	000033596	19-Nov-07	Phil. Long Distance Tel. Co.	864.00
"CC-110145"	000033628	19-Nov-07	Phil. Long Distance Tel. Co.	133.63
"CC-110147"	000033629	19-Nov-07	Phil. Long Distance Tel. Co.	260.14
"CC-110149"	000033630	19-Nov-07	Phil. Long Distance Tel. Co.	273.68
"CC-110151"	000033631	19-Nov-07	Phil. Long Distance Tel. Co.	307.98
"CC-110153"	000033632	19-Nov-07	Phil. Long Distance Tel. Co.	335.93
"CC-110155"	000033633	19-Nov-07	Phil. Long Distance Tel. Co.	137.51
"CC-110157"	000033634	19-Nov-07	Phil. Long Distance Tel. Co.	135.87
"CC-110161"	000033636	19-Nov-07	Phil. Long Distance Tel. Co.	399.86
"CC-110163"	000033637	19-Nov-07	Phil. Long Distance Tel. Co.	1,573.95
"CC-110165"	000033638	19-Nov-07	Phil. Long Distance Tel. Co.	153.87
"CC-110167"	000033639	19-Nov-07	Phil. Long Distance Tel. Co.	515.03
"CC-110169"	000033640	19-Nov-07	Phil. Long Distance Tel. Co.	835.76
"CC-110171"	000033641	19-Nov-07	Phil. Long Distance Tel. Co.	225.46
"CC-110173"	000033642	19-Nov-07	Phil. Long Distance Tel. Co.	159.21
"CC-110175"	000033643	19-Nov-07	Phil. Long Distance Tel. Co.	8,070.77

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Exhibit	Invoice/ O.R. No.	Date	Vendor	Disallowed Input VAT
"CC-110179"	0551	4-Dec-07	RC Ventures	23,995.35
"CC-110181"	0118	26-Nov-07	Rejoice Tyre Gallery & Auto Center	278.57
"CC-110397"	4088	5-Nov-07	Phil. Environmental & Tech. Syst. & Serv. Inc.	2,892.86
"CC-110398"	4089	5-Nov-07	Phil. Environmental & Tech. Syst. & Serv. Inc.	1,928.57
"CC-110420"	0154	22-Oct-07	Veesafe Industrial Sales	87,803.57
"CC-110159"	000033635	19-Nov-07	Phil. Long Distance Tel. Co.	412.83
"CC-110432"	31124	21-Nov-07	Roadstar Enterprises	2,318.68
"CC-110009"	5751	29-Nov-07	Chempro Analytical Serv. Lab., Inc.	6,428.57
"CC-110011"	6775	19-Nov-07	Creative Response	4,432.80
"CC-110028"	2953	20-Nov-07	Expertline Ventures Corp.	22,680.00
"CC-110031"	0301	7-Dec-07	Firstly & Foremost Resort Corp.	1,064.61
"CC-110033"	1045	21-Nov-07	First Phils. Skills & Equipt. Testing Corp.	25,560.00
"CC-110038"	62486	27-Nov-07	Fuji Xerox Philippines, Inc.	59.34
"CC-110079"	0387	19-Nov-07	Government Performance Magazine	1,060.71
"CC-110081"	349	5-Dec-07	Harty Incorporated Phils.	52,232.14
"CC-110083"	4347	23-Nov-07	Hearth & Hastings Phils., Inc.	2,571.43
"CC-110088"	2427	7-Dec-07	High Grip Auto Center	171.43
"CC-110094"	4374	14-Dec-07	Kinden Philippines Corporation	8,265.00
"CC-110096"	10971	10-Dec-07	KPI Elevators, Inc.	7,519.42
"CC-110098"	10972	10-Dec-07	KPI Elevators, Inc.	7,811.46
"CC-110101"	15935	28-Nov-07	La Corona De Pagsanjan Resort	2,864.40
"CC-110125"	0974	28-Dec-07	Multi-Lift Sales Corporation	10,200.00
"CC-110134"	103830	28-Nov-07	Pagsanjan Rapids Hotel, Inc.	880.84
"CC-110177"	97032	26-Dec-07	Punongbayan & Araullo	2,052.00
"CC-110202"	142601	28-Nov-07	Toyota Batangas City, Inc.	15.00
"CC-110205"	142790	14-Dec-07	Toyota Batangas City, Inc.	114.00
"CC-110207"	31750	3-Dec-07	Toyota Makati, Inc.	205.80
"CC-110216"	0333	19-Dec-07	Water-Lite Engineering	1,821.43
"CC-110278"	97031	26-Dec-07	Punongbayan & Araullo	1,200.00
"CC-110289"	31811	5-Dec-07	Toyota Makati, Inc.	214.29
"CC-110291"	31598	22-Nov-07	Toyota Makati, Inc.	138.00
"CC-110294"	31761	3-Dec-07	Toyota Makati, Inc.	114.00
"CC-110199"	140976	20-Nov-07	Toyota Batangas City, Inc.	1,218.86
"CC-110287"	741	7-Dec-07	Tantoco Villanueva De Guzman & Llamas Law Offices	2,340.00
"CC-110189"	37724	29-Nov-07	Santos Telephone Corp.	235.71
"CC-120004"	SXL-032755	19-Dec-07	Digital Tel. Phils., Inc.	61.89
"CC-120008"	SXL-032757	19-Dec-07	Digital Tel. Phils., Inc.	414.00
"CC-120081"	0049	28-Dec-07	Micro Lynx Systems Enterprises	9,235.74
"CC-120083"	0048	28-Dec-07	Micro Lynx Systems Enterprises	59,975.44
"CC-120109"	000036572	20-Dec-07	Phil. Long Distance Tel. Co.	864.00
"CC-120322"	3923	19-Dec-07	MFT International Corporation	12,284.06
"CC-120021"	0306	19-Dec-07	Firstly & Foremost Resort Corp.	1,377.84
"CC-120060"	4358	13-Dec-07	Hearth & Hastings Phils., Inc.	23,673.22
"CC-120085"	0063	14-Dec-07	MSD Power and Trading, Inc.	9,557.14
"CC-120130"	0078	28-Dec-07	Sards Construction	95,357.14
"CC-120149"	928479	5-Dec-07	DHL Express (Philippines) Corp.	33.60
"CC-120166"	3756	6-Dec-07	Masigasig Security & Manpower Agency, Inc.	86,397.84
"CC-120171"	3762	19-Dec-07	Masigasig Security & Manpower Agency, Inc.	86,308.99
"CC-120182"	97029	26-Dec-07	Punongbayan & Araullo	1,200.00
"CC-120201"	390855	21-Dec-07	Universal Holidays, Inc.	181.50
"CC-120149"	048658	20-Dec-07	Viking Cars, Incorporated	797.80
"CC-120319"	0004	20-Dec-07	JJLL Trading	1,542.86
"CC-120126"	37924	28-Dec-07	Santos Telephone Corp.	235.71
<i>2. Stamped as zero-rated sales</i>				
"CC-120262"	12554	21-Nov-07	Compresstech Resources, Inc.	1,283.18
<i>3. Not a source of valid input tax</i>				
"CC-110036"	32771	24-Nov-07	Ford Global City Auto Sales, Inc.	720.00
<i>4. Official receipt presented does not pertain to the transaction</i>				
"CC-070369"	0529	31-Jul-07	Vegas Marketing	5,040.00

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Exhibit	Invoice/ O.R. No.	Date	Vendor	Disallowed Input VAT
"CC-090205"	0179	26-Sep-07	C.S. Bracamonte	1,562.17
"CC-010318"	13871	9-Jan-07	Welltech Service Corporation	1,008.00
			Total	Php 6,200,578.92

In fine, Petitioner sufficiently proved its entitlement to the issuance of a tax credit certificate representing unutilized excess input VAT attributable to zero-rated sales/receipts only to the extent of Php41,131,185.33, as computed below:

Claimed Excess Input VAT	Php 58,802,851.18
Less: Disallowances	
Per ICPA	11,422,363.28
Per Court	6,200,578.92
Valid Excess Input VAT	Php 41,179,908.98
Multiply by total valid zero-rated sales/receipts	5,735,752,769.57
Divide by total declared zero-rated sales/receipts	5,742,547,292.51
Refundable Excess Input VAT Attributable to Valid Zero-Rated Sales/Receipts	Php 41,131,185.33

Consequently, Petitioner's "Motion for Reconsideration" is **GRANTED**.

Accordingly, the dispositive portion of our Decision dated June 06, 2017 is **AMENDED** to read, as follows:

WHEREFORE, premises considered, the Petition for Review is **GRANTED**. Accordingly, Respondent Commissioner of Internal Revenue is hereby **ORDERED TO ISSUE A TAX CREDIT CERTIFICATE** in favor of Petitioner in the amount of **Php41,131,185.33**, representing its unutilized input value-added taxes on its local purchases and/or importation of goods and services, capital goods and payments for services rendered by non-residents, attributable to its zero-rated sales for the period January 1, 2007 to December 31, 2007.

SO ORDERED.


MA. BELEN M. RINGPIS-LIBAN
Associate Justice

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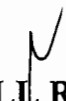
WE CONCUR:


LOVELL R. BAUTISTA
Associate Justice


ESPERANZA R. FABON-VICTORINO
Associate Justice

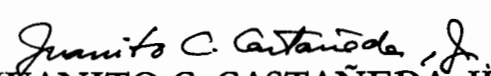
ATTESTATION

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.


LOVELL R. BAUTISTA
Associate Justice
Chairperson

CERTIFICATION

Pursuant to Article VIII, Section 13 of the Constitution, and the Division's 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.


JUANITO C. CASTAÑEDA, JR.
Acting Presiding Justice

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