

REPUBLIC OF THE PHILIPPINES
Court of Tax Appeals
QUEZON CITY

Third Division

DEUTSCHE KNOWLEDGE
SERVICES, PTE. LTD.,

Petitioner,

CTA CASE NO. 8402

Members:

-versus-

*Bautista, Chairperson
Fabon-Victorino, and
Ringpis-Liban, JJ.*

COMMISSIONER OF INTERNAL
REVENUE,

Respondent.

Promulgated:

JAN 06 2015

Chil 10:10 a.m.

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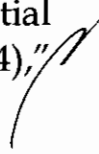
RESOLUTION

BAUTISTA, J:

On September 16, 2014, the Court promulgated a Decision, disposing of the case as follows:

"WHEREFORE, in view of the foregoing, the Petition for Review by petitioner Deutsche Knowledge Services, Pte Ltd. is hereby **PARTIALLY GRANTED**. Accordingly, respondent is hereby **ORDERED** to refund to petitioner or issue a tax credit certificate in its favor the amount of Php15,859,091.24 representing the latter's unutilized input VAT attributable to its zero-rated sales for the fourth quarter of taxable year 2009.

SO ORDERED."

On October 9, 2014, respondent filed a "Motion for Partial Reconsideration (Re: Decision promulgated on 16 September 2014)," 

interposing the sole issue of whether or not petitioner was able to substantiate its administrative claim for refund. It is respondent's claim that petitioner failed to do so, thus the Court cannot exercise its appellate power to review and has no jurisdiction in the present case.

On October 9, 2014, petitioner filed through registered mail an "Omnibus Motion," asking the Court for the following:

"2. Petitioner respectfully seeks partial reconsideration by this Court of its Decision insofar as the denied amount is concerned on the basis of the following:

- a. This Court erred in ruling that Petitioner failed to prove its zero-rated sales in the amount of Php1,782,873,522.27 for the 4th quarter of calendar year (CY) 2009;
- b. This Court erred in ruling that only the amortization for the 4th quarter of CY 2009 in the amount of Php31,796.71 may be claimed by Petitioner as valid input tax credits for the same taxable year; and
- c. This Court erred in ruling that Petitioner's input VAT for the 4th quarter of CY 2009 should be applied against its output VAT of Php1,353,651.47.

3. Petitioner likewise begs the indulgence of this Court to re-open the trial in this case and allow Petitioner to present additional evidence in support of its Motion for Partial Reconsideration.

4. With all due respect to this Court, Petitioner also humbly seeks clarification of its Decision, particularly with respect to the specific documentary evidence which allegedly failed to comply with the substantiation requirements under Sections 110(A) and 113(A) and (B), National Internal Revenue Code (the "Tax Code"), as implemented by Sections 4.110-2, 4.110-8 and 4.113-1, Revenue Regulations (RR) No. 16-05."

On October 14, 2014, the Court issued a Resolution ordering petitioner to Comment on the "Motion for Partial Reconsideration (Re: Decision promulgated on 16 September 2014)."

On October 21, 2014, Court issued a Resolution ordering respondent to file her Comment on the "Omnibus Motion."

On October 30, 2014, through registered mail, petitioner filed a "Comment (Re: Respondent's Motion for Partial Reconsideration dated October 8, 2014)."

On November 6, 2014, respondent filed her "Motion for Extension of Time to File Comment," praying for a ten (10) day extension, which was granted via a Resolution dated November 25, 2014.

On November 21, 2014, respondent filed through registered mail a "Comment (To petitioner's Omnibus Motion dated 09 October 2014)."

Thus, respondent's "Motion for Partial Reconsideration (Re: Decision promulgated on 16 September 2014)" and petitioner's "Omnibus Motion" is now submitted for resolution.

Jurisdiction of the Court

At the onset, respondent's "Motion for Partial Reconsideration (Re: Decision promulgated on 16 September 2014)" cannot be given any merit. Respondent's main argument is that petitioner failed to submit complete documents, as per Revenue Memorandum Order (RMO) No. 53-98.¹

As correctly pointed out by petitioner, RMO No. 53-98 is an issuance by the Bureau of Internal Revenue to its revenue officers to serve as a guide with regard to the documentary requirements for a tax audit, not for administrative claim for refund. In addition, the case cited by petitioner, *Commissioner of Internal Revenue v. Team Energy Corporation*,² was on point when it stated that the submission

¹ Dated June 1, 1998.

² CTA EB Case No. 652, October 4, 2011.

of complete supporting documents is necessary for a favorable consideration of the said claim but it does not preclude a taxpayer from filing a judicial claim after the denial or the lapse of the 120-day period granted to the Commissioner of Internal Revenue to decide on the said administrative claim.

This being said, the contention of respondent that the Court does not have jurisdiction has no basis.

Petitioner failed to prove its zero-rated sales in the amount of Php182,581,582.83

Petitioner alleges in the "Omnibus Motion" that it sufficiently established the zero-rated sales in the amount of Php182,581,582.83, however a careful review of the evidence submitted by the petitioner reveal the following:

Client	OR No.	Provisional Receipt	Exhibit No.	Remarks	Inward Remittance Exhibit No.	Remarks
DB AG, Inlandsbank	601		M-55.2	Missing	M-55.3	OK
DB Vienna AG BR	606		M-60.1	OK	M-60.2	OK
DB AG Singapore	542	48	M-1.1	Missing OR; OK	M-1.2	OK
DB (Suisse) SA	543	49	M-2.1	Missing OR; OK	M-2.2	OK
Rued, Blass & Cie AG	544	50	M-3.1	Missing OR; OK	M-3.2	OK
Rued, Blass & Cie AG	545	51	M-4.1	Missing OR; OK	M-4.2	OK
DB AG Asia Pacific HO	546	52	M-5.1	Missing OR; OK	M-5.2	OK
DB AG Hongkong	618				M-72.1	OK

While Official Receipt No. 606 formed part of petitioner's Formal Offer of Evidence ("FOE"), the same did not indicate the amount of VAT in such transaction as required in Section 4.113-1 of Revenue Regulation No. 16-05. On the other hand, Official Receipt Nos. 542 to 546, 601, and 618 were not part of petitioner's FOE and were merely annexed to the "Omnibus Motion."

The Court finds no merit in petitioner's prayer that the Official Receipt Nos. 542 to 546, 601, and 618 be accepted in the interest of substantial justice and equity. The petitioner was already given ample time to submit the necessary documents in order to properly substantiate its claim yet the FOE submitted by petitioner did not include the same. This oversight is not excusable negligence.

***Petitioner's allowable input VAT
for purchases of capital goods
exceeding Php1 Million for the 4th
Quarter totals to Php28,430.61***

Petitioner states that the estimated useful life of its purchases of capital goods exceeding Php1 Million for the 4th quarter of taxable year 2009 should be 48 years instead of 60 years. Thus, petitioner alleges that it should have an allowable Input VAT of Php65,503.30.

A perusal of the audited financial statements and the sales invoices on record show the following findings:

- 1) The notes³ to the audited financial statement for the year ended December 31, 2009 expressly states that the Company Policy is to use a ten-year estimated useful life for its office equipment;
- 2) All the sales invoices complied with the invoicing requirements pursuant to Section 4.113-1 of RR 16-05; and
- 3) Almost all the submitted sales invoices relative to this transaction pertain to purchases of office equipment such as laptops or laptop batteries, except for Exhibit M-113 which indicated a Service Charge rather than a purchase of goods.

Since petitioner's Company Policy is based on an estimated useful life of ten years for its purchased office equipment, then its contention that the purchase of capital goods exceeding Php1 million be amortized only for 48 months is untenable.

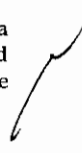
Consequently, as based on Section 4.110-3(a) of the RR 16-05,⁴ the said purchases should be amortized over 60 months computed as follows:

³ Exhibit "M-1310."

⁴ Section 4.110-3.

xxx xxx xxx

(a) If the estimated useful life of a capital good is five (5) years or more - The input tax shall be spread evenly over a period of sixty (60) months and the claim for input tax credit will commence in the calendar month when the capital good is acquired. The total input taxes on purchases or importations of this type of capital goods shall be divided by 60 and the quotient will be the amount to be claimed monthly.



Registered Name of Supplier	Exhibit No.	Input VAT per QVAT Return	Life	Date of Purchased	Months Used	Allowable Input VAT
Accent Micro Technologies Inc.	M-99	536.57	60	9/24/2009	3	26.83
Accent Micro Technologies Inc.	M-109	168,846.43	60	10/19/2009	2	5,628.21
Accent Micro Technologies Inc.	M-110	483.00	60	10/19/2009	3	24.15
Accent Micro Technologies Inc.	M-111	1,449.00	60	10/19/2009	3	72.45
Accent Micro Technologies Inc.	M-112	236,385.00	60	10/20/2009	3	11,819.25
Accent Micro Technologies Inc.	M-114	804.43	60	10/29/2009	3	40.22
Accent Micro Technologies Inc.	M-115	2,250.00	60	11/5/2009	2	75.00
Accent Micro Technologies Inc.	M-116	623.14	60	11/9/2009	2	20.77
Accent Micro Technologies Inc.	M-117	498.21	60	11/9/2009	2	16.61
Accent Micro Technologies Inc.	M-118	708.86	60	11/9/2009	2	23.63
Accent Micro Technologies Inc.	M-119	483.00	60	11/17/2009	2	16.10
Accent Micro Technologies Inc.	M-120	483.00	60	11/17/2009	2	16.10
Accent Micro Technologies Inc.	M-121	13,507.71	60	11/17/2009	2	450.26
Accent Micro Technologies Inc.	M-122	2,107.29	60	11/27/2009	2	70.24
Accent Micro Technologies Inc.	M-123	270,154.29	60	12/2/2009	1	4,502.57
Accent Micro Technologies Inc.	M-124	337,692.86	60	12/2/2009	1	5,628.21
TOTAL		1,037,012.79				28,430.61

Further, it should be noted that *Exhibit "M-113"* was removed from the list above since it pertains to a "service charges for 4 Technical Support for BCP Project for the period of SEPTEMBER 26 to OCTOBER 25, 2009," which should be considered as purchase of services. Since petitioner submitted only a sales invoice to substantiate this transaction instead of an Official Receipt as required by Section 4.113-1(A) of RR 16-05, then the same should be disallowed.

Petitioner failed to substantiate its excess input tax carried over from the previous quarters

Petitioner avers that it has an excess input VAT carried over from the previous quarters amounting to Php320,171,664.12, as indicated in Line 20E of its Quarterly VAT Return for the 4th Quarter of taxable year 2009. Petitioner states that this amount is more than sufficient to cover its output tax liability in the amount of Php1,353,651.47,⁵ and that it has sufficiently proven said amount by indicating the same in its Quarterly VAT Return for the 3rd quarter of taxable year 2009 and submitting a Sworn Statement⁶ dated June 15, 2012 by Ms. Rachel Concepcion, the Legal Entity Controller.

However, in the case of *Chevron Holdings, Inc. vs. Commissioner of Internal Revenue*,⁷ the Court *En Banc* reiterated the discussion of requiring the submission of documentation for input tax carried over, to wit:

⁵ *Exhibit "M-1300."*

⁶ *Exhibit "J."*

⁷ CTA Case No. 940, October 28, 2014.

"A mere reliance on an entry in the current year's Quarterly VAT Return that a certain amount was carried over from the previous taxable year is not enough. Petitioner must be able to prove that the amount in the Quarterly VAT Return is accurate and that it was properly carried over, before the Court En Banc can allow it."

Consequently, petitioner's contention that its input VAT for the 4th quarter of taxable year 2009 should not be applied against its output VAT for the same quarter since it has excess input VAT carried over from previous quarters in the amount of Php320,171,664.12 is untenable. Upon review of petitioner's FOE, the Court notes the following:

- 1) Only Monthly VAT Returns for October 2009⁸ and November 2009⁹ and Quarterly VAT Return for the fourth quarter of 2009¹⁰ was submitted by the petitioner;
 - 2) Line 17A (*Input Tax Carried Over from Previous Period/ Excess over 70% of Output VAT to Input Tax Carried Over from Previous Period*) for both Monthly VAT Returns for October and November 2009 did not indicate any amount of Input VAT carried over from previous period;
 - 3) Line 17E (*Others*) indicated the amount Php320,171,664.12, while Line 20E (*Others*) indicated the amount Php320,171,664.12;
 - 4) Line 20A (*Input Tax Carried Over from Previous Period*) did not indicate any amount of Input Tax Carried Over from Previous Period;
 - 5) The third quarter VAT Return was submitted as Annex "A-7" of the subject Omnibus Motion; and
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⁸ Exhibits "M-1296" and "M-1297."

⁹ Exhibits "M-1298" and "M-1299."

¹⁰ Exhibits "M-1300" and "M-1301."

- 6) No additional official receipts or invoices were submitted to support the input VAT carried over from previous period in the amount of Php320,171,664.12.

Therefore, petitioner's mere declaration in its fourth quarter VAT return of the amount of input tax carried over without further supporting invoices and/or official receipts to substantiate the claim is insufficient. Thus, the Court did not err in deducting the input VAT for the fourth quarter of taxable year 2009 to the output VAT for the same quarter.

Petitioner failed to comply with the necessary invoicing requirements

Petitioner also prayed for a clarificatory judgment, asking the Court to point out the documents which allegedly fail to comply with the substantiation requirements under Sections 110(A) and 113(A) and (B) of the 1997 NIRC, as implemented by Sections 4.110-2, 4.110-8 and 4.113-1 of RR No. 16-05.

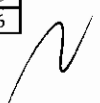
Consequently, the requested breakdown of documents based from the original computation is as follows:

Findings	Disallowed Input VAT (Php)	Exhibits
Input VAT on purchases of goods supported by invoices dated outside the period of claim	558,887.64	M-208, M-210, M-215 to M-254, M-267, M-660, M-683, M-684, M-906, M-907, M-916, M-1192 to M-1194, M-1204, M-1243 to M-1246, and M-1255 to M-1259
Input VAT on purchases of goods supported by invoices dated outside the period of claim wherein the amount of input VAT were not separately indicated	115,281.31	M-98, M100 to M-103, M-207, M-745 to M-804, M-808 to M-898, M-911, M-912, and M-1283
Input VAT on purchases of goods supported by invoices wherein the amount of input VAT were not separately indicated	21,956.84	M-353, M-354, M-899, M-908, M-1160, and M-1161
Input VAT on purchases of services supported by OR dated outside the period of claim	529,827.08	M264, M-265, M-373, M-281, M-669, M-708 to M-711, M-904, and M-1239
Input VAT on purchases of services supported by OR dated outside the period of claim and wherein the amount of input VAT were not separately indicated.	393,410.91	M-190, M-192, M-362, M-681, M-734, and M-1295

Input VAT on purchases of services supported by OR wherein the amount of input VAT were not separately indicated	4,490,869.15	M-104, M-136, M-137, M-148 to M-152, M-191, M-193 to M-195, M-199, M-200, M-268, M-287, M-290, M-291, M-295, M-305 to M-308, M-356, M-377, M-682, M-687, M-690 to M-694, M-699 to M-705, M-712, M-715 to M-720, M-722, M-724 to M-728, M-928, M-935, M-937, M-939, M-940, M-945, M-946, M-961, M-1008, M-1061/1127, M-1075, M-1100 to to M-1104, M-1107, M-1108, M-1110, M-1111, M-1118, M-1120, M-1122, M-1123, M-1126, M-1132, M-1137, M-1139 to M-1142, M-1144 to M-1151, M-1153 to M-1155, M-1158, M-1159, M-1162, M-1163, M-1167 to M-1172, M-1175, M-1179, M-1187 to M-1191, M-1208, M-1224, M-1226, M-1229 to M-1231, M-1252 to M-1254, M-1262, M-1263, M-1272, M-1285, M-1286, and M-1288
Input VAT on purchase of services supported by documents other than VAT OR	3,477,697.40	M-158 to M-162, M-196 to M-198, M-274, M-275, M-296, M-297, M-322 to M-324, M-661, M-1209, M-1210, and M-1213
Input VAT on purchases of services supported by documents imprinted with the statement "This document is not a valid source of input tax"	794,303.25	M-919 to M-927, M-929 to M-934, M-936, M-938, M-941 to M-944, M-947 to M-960, M-962 to M-1007, M-1009 to M-1060, M-1062 to M-1074, M-1076 to M-1099, M-1105, M-1106, M-1109, M-1112 to M-1117, M-1119, M-1121, M-1124, M-1125, M-1128 to M-1131, M-1133 to M-1136, M-1138, M-1143, M-1152, M-1156, and M-1157
Over-claimed input VAT on purchase of services	87,920.61	M-155 to M-157, M-201 to M-206, M-211, M-292 to M-294, M-363, M-364, M-375 , M-376, M-378, M-706, M-707, M-730, M-900 to M-902, M-914, and M-1287
Input VAT on purchase of services supported by VAT Zero-rated OR	1,679.46	M-1242
Input VAT on purchase of goods supported by invoices without BIR Authority to Print	66,859.74	M-662 and M-663
Without supporting documents	3,529,526.80	Please refer to Table A below
Total	14,068,220.19	

Table A. Without Supporting Documents

Registered Name of Supplier	Disallowed Input VAT	Registered Name of Supplier	Disallowed Input VAT
ACCENT MICRO TECHNOLOGIES INC	10,143.90	GLOBE TELECOM A/C 52499458	192.86
ACCRA LAW	768	GLOBE TELECOM A/C 52499458	128.57
ACCRA LAW	19,536.00	GLOBE TELECOM A/C 52499466	128.57
ARBETEL CONSTRUCTION & TRADING	17,913.25	GLOBE TELECOM A/C 52499466	192.86
ASCOTT MAKATI INC.	27,344.42	GLOBE TELECOM A/C 52499539	192.86
ASIA SELECT INC	4,517.60	GLOBE TELECOM A/C 52499539	128.57
ATLANTICA FIRE SAFETY SYSTEMS	10,440.00	GLOBE TELECOM A/C 52499563	192.86
ATLANTICA FIRE SAFETY SYSTEMS	10,440.00	GLOBE TELECOM A/C 52556877	192.86
AVAYA PHILIPPINES INC	544,730.37	GLOBE TELECOM A/C 52556885	192.86
BIGFISH RESTAURANT CONCEPTS IN	16,666.07	GLOBE TELECOM A/C 52556907	128.57
BONIFACIO BISTRO ITALIANO	19,108.93	GLOBE TELECOM A/C 52556907	192.86
BONIFACIO BISTRO ITALIANO	1,767.86	GLOBE TELECOM A/C 52556915	128.57
CATWALK ADVERTISING AND MARKET	17,142.86	GLOBE TELECOM A/C 52556915	192.86
CHITTICK FIRE & SECURITY	25,771.21	GLOBE TELECOM A/C 52556931	192.86
CHITTICK FIRE & SECURITY	4,275.57	GLOBE TELECOM A/C 52556958	192.86
CLAIRE MICHELLE D. CHAINANI	11,344.53	GLOBE TELECOM A/C 52701184	321.43
COLLIERS INTERNATIONAL PHILIPP	5,648.91	GLOBE TELECOM A/C 52701184	214.29
CONTI'S	371.25	GLOBE TELECOM A/C 52701257	321.43
CWC INTERNATIONAL CORP	5,705.14	GLOBE TELECOM A/C 52701508	321.43
CWC INTERNATIONAL CORP	12,501.43	GLOBE TELECOM A/C 52797637	192.86



DB WIZARD, INC.	4,714.29	GLOBE TELECOM A/C 52797637	128.57
DHL EXPRESS PHILS CORP	11,379.40	GLOBE TELECOM A/C 52961747	321.43
ePLDT INC.	559,262.39	GLOBE TELECOM A/C 52961747	788.02
ESCO Audio Visual Pte.Ltd.	31,517.66	GLOBE TELECOM A/C 52973621	128.57
EXCLUSIVE CARS, INC	2,153.37	GLOBE TELECOM A/C 52973621	246.77
EXCLUSIVE CARS, INC	3,841.73	GLOBE TELECOM A/C 52973745	128.57
EXCLUSIVE CARS, INC	7,950.00	GLOBE TELECOM A/C 52973745	128.57
EXCLUSIVE CARS, INC	1,647.66	GLOBE TELECOM A/C 52973745	246.77
EXCLUSIVE CARS, INC	4,051.09	GLOBE TELECOM A/C 53167858	248.57
EXCLUSIVE CARS, INC	3,303.14	GLOBE TELECOM A/C 53235098	128.57
EXCLUSIVE CARS, INC	3,386.50	GLOBE TELECOM A/C 53235098	222.86
EXCLUSIVE CARS, INC	2,882.95	GLOBE TELECOM A/C 53235144	128.57
EXCLUSIVE CARS, INC	2,882.95	GLOBE TELECOM A/C 53235144	222.86
EXCLUSIVE CARS, INC	2,882.95	GLOBE TELECOM A/C 53235187	128.57
EXCLUSIVE CARS, INC	2,882.95	GLOBE TELECOM A/C 53235187	222.86
EXCLUSIVE CARS, INC	2,882.95	GLOBE TELECOM A/C 53235195	128.57
EXCLUSIVE CARS, INC	2,882.95	GLOBE TELECOM A/C 53235195	222.86
EXCLUSIVE CARS, INC	2,882.95	GLOBE TELECOM A/C 53235209	222.86
EXCLUSIVE CARS, INC	2,882.95	GLOBE TELECOM A/C 53235209	128.57
EXCLUSIVE CARS, INC	2,882.95	GLOBE TELECOM A/C 53235217	128.57
EXCLUSIVE CARS, INC	2,882.95	GLOBE TELECOM A/C 53235217	128.57
EXCLUSIVE CARS, INC	2,882.95	GLOBE TELECOM A/C 53235225	128.57
EXCLUSIVE CARS, INC	2,637.59	GLOBE TELECOM A/C 53263148	342.86
EXCLUSIVE CARS, INC	2,882.95	GLOBE TELECOM A/C 53263172	228.57
EXCLUSIVE CARS, INC	2,882.95	GLOBE TELECOM A/C 53263261	228.57
EXCLUSIVE CARS, INC	2,882.95	GLOBE TELECOM A/C 53307366	307.14
EXCLUSIVE CARS, INC	2,882.95	GLOBE TELECOM A/C 53307366	214.29
EXCLUSIVE CARS, INC	2,882.95	GLOBE TELECOM A/C 53307382	214.29
EXCLUSIVE CARS, INC	2,882.95	GLOBE TELECOM A/C 53307382	307.14
EXCLUSIVE CARS, INC	3,126.21	GLOBE TELECOM A/C 53307463	214.29
EXCLUSIVE CARS, INC	2,620.78	GLOBE TELECOM A/C 53307471	214.29
EXCLUSIVE CARS, INC	2,979.64	GLOBE TELECOM A/C 53307471	307.14
EXCLUSIVE CARS, INC	2,215.61	GLOBE TELECOM A/C 53307722	307.14
EXCLUSIVE CARS, INC	2,597.04	GLOBE TELECOM A/C 53337028	214.29
EXCLUSIVE CARS, INC	2,155.62	GLOBE TELECOM A/C 53413204	214.29
EXCLUSIVE CARS, INC	2,937.83	GLOBE TELECOM A/C 53413204	221.43
EXCLUSIVE CARS, INC	2,773.73	GLOBE TELECOM A/C 53413239	214.29
EXCLUSIVE CARS, INC	3,127.29	GLOBE TELECOM A/C 53413263	221.43
EXCLUSIVE CARS, INC	2,660.14	GLOBE TELECOM A/C 53413271	221.43
EXCLUSIVE CARS, INC	2,866.85	GLOBE TELECOM A/C 53459778	414.75
EXCLUSIVE CARS, INC	3,335.27	GLOBE TELECOM A/C 53459794	414.75
EXCLUSIVE CARS, INC	2,881.82	GLOBE TELECOM A/C 53459808	414.75
EXCLUSIVE CARS, INC	1,131.45	GLOBE TELECOM A/C 53459824	414.75
EXCLUSIVE CARS, INC	2,882.95	GLOBE TELECOM A/C 53459859	414.75
EXCLUSIVE CARS, INC	2,821.61	GLOBE TELECOM A/C 53555106	207.37
EXCLUSIVE CARS, INC	2,882.95	GLOBE TELECOM A/C 53555467	207.37
EXCLUSIVE CARS, INC	2,882.95	GLOBE TELECOM A/C 53555475	207.37
EXCLUSIVE CARS, INC	2,882.95	GLOBE TELECOM A/C 53555513	207.37
EXCLUSIVE CARS, INC	2,882.95	GLOBE TELECOM A/C 53555629	128.57
EXCLUSIVE CARS, INC	2,882.95	GLOBE TELECOM A/C 53555661	128.57
EXCLUSIVE CARS, INC	2,882.95	GLOBE TELECOM A/C 53555777	128.57
EXCLUSIVE CARS, INC	2,584.19	GLOBE TELECOM A/C 53556013	141.01
EXCLUSIVE CARS, INC	2,882.95	GLOBE TELECOM A/C 53556013	128.57
EXCLUSIVE CARS, INC	2,882.95	GLOBE TELECOM A/C 53556021	128.57
EXCLUSIVE CARS, INC	2,882.95	GLOBE TELECOM A/C 53647973	290.32
EXCLUSIVE CARS, INC	2,882.95	GLOBE TELECOM A/C 53648058	290.32
EXCLUSIVE CARS, INC	2,882.95	GLOBE TELECOM A/C 53668636	165.9
EXCLUSIVE CARS, INC	2,882.95	GLOBE TELECOM A/C NO. 52180311	446.76
EXCLUSIVE CARS, INC	2,054.89	GLOBE TELECOM A/C NO. 52316108	245.65
EXCLUSIVE CARS, INC	2,103.23	GLOBE TELECOM A/C NO. 52316108	321.43
EXCLUSIVE CARS, INC	1,876.53	GLOBE TELECOM A/C NO. 52316108	214.29
EXCLUSIVE CARS, INC	2,080.61	GLOBE TELECOM AC 46328361	128.57
EXCLUSIVE CARS, INC	3,002.17	GLOBE TELECOM AC 46328361	128.57
EXCLUSIVE CARS, INC	1,445.36	GLOBE TELECOM AC 46328728	128.57
EXCLUSIVE CARS, INC	1,658.57	GLOBE TELECOM AC 46328728	128.57
EXCLUSIVE CARS, INC	1,763.57	GLOBE TELECOM AC 46640608	204
EXCLUSIVE CARS, INC	2,681.56	GLOBE TELECOM AC 46640659	128.57
EXCLUSIVE CARS, INC	2,002.42	GLOBE TELECOM AC 46640659	128.57
EXCLUSIVE CARS, INC	2,062.40	Globe Telecom AC 46878698	128.57
EXCLUSIVE CARS, INC	3,354.55	Globe Telecom AC 46878698	128.57
EXCLUSIVE CARS, INC	2,459.80	GLOBE TELECOM AC 46878744	128.57
EXCLUSIVE CARS, INC	2,886.21	GLOBE TELECOM AC 46878744	128.57
EXCLUSIVE CARS, INC	2,744.67	GLOBE TELECOM AC 46878752	128.57
EXCLUSIVE CARS, INC	3,175.53	GLOBE TELECOM AC 48049184	128.57
EXCLUSIVE CARS, INC	3,329.92	GLOBE TELECOM AC 48049184	128.57
EXCLUSIVE CARS, INC	14,046.70	GLOBE TELECOM AC 50574118	128.57
EXCLUSIVE CARS, INC	2,381.70	GLOBE TELECOM AC 51252092	204
EXCLUSIVE CARS, INC	3,009.66	GLOBE TELECOM AC 51252092	128.57
EXCLUSIVE CARS, INC	2,366.79	GLOBE TELECOM AC 51252106	204
EXCLUSIVE CARS, INC	2,210.38	GLOBE TELECOM AC 51252106	128.57

EXCLUSIVE CARS, INC	2,210.25	GLOBE TELECOM AC 51252106	128.57
EXCLUSIVE CARS, INC	1,939.19	GLOBE TELECOM AC 51252203	204
EXCLUSIVE CARS, INC	2,127.75	GLOBE TELECOM AC 51252815	204
EXCLUSIVE CARS, INC	1,553.47	GLOBE TELECOM AC 51252815	128.57
EXCLUSIVE CARS, INC	1,335.98	GLOBE TELECOM AC 51771456	538.64
EXCLUSIVE CARS, INC	2,664.62	GLOBE TELECOM AC 51771456	158.57
EXCLUSIVE CARS, INC	1,494.54	GLOBE TELECOM AC 51771456	-221.77
EXCLUSIVE CARS, INC	1,566.43	GLOBE TELECOM AC 51771456	3,622.40
EXCLUSIVE CARS, INC	349.29	GLOBE TELECOM AC 51771499	535.71
EXCLUSIVE CARS, INC	785.36	GLOBE TELECOM AC 51771499	535.71
FACILITIES MANAGERS, INC.	1,150.06	GLOBE TELECOM AC 51771596	214.29
FACILITIES MANAGERS, INC.	79.3	GLOBE TELECOM AC 51771596	214.29
FACILITIES MANAGERS, INC.	2,690.18	GLOBE TELECOM AC 51771596	214.29
FACILITIES MANAGERS, INC.	2,621.49	GLOBE TELECOM AC 51823014	275.68
FACILITIES MANAGERS, INC.	5,360.68	GLOBE TELECOM AC 51823014	214.29
FACILITIES MANAGERS, INC.	2,030.60	GLOBE TELECOM AC 51963754	214.29
FACILITIES MANAGERS, INC.	153,176.36	GLOBE TELECOM AC 51963754	315.83
FRASERS HOSPITALITY INVESTMENT	27,473.04	GLOBE TELECOM AC 51963754	214.29
FRASERS HOSPITALITY INVESTMENT	4,173.12	GLOBE TELECOM AC 51963983	214.29
FRASERS HOSPITALITY INVESTMENT	2,289.42	GLOBE TELECOM AC 51964076	214.29
GLOBAL CITY CAR LEASE &	8,771.57	GLOBE TELECOM AC 51964106	214.29
GLOBAL CITY CAR LEASE &	8,368.82	GLOBE TELECOM AC 51964106	214.29
GLOBAL CITY CAR LEASE &	8,732.25	GLOBE TELECOM AC 51964122	214.29
GLOBAL CITY CAR LEASE &	7,809.75	GLOBE TELECOM AC 51964122	214.29
GLOBAL CITY CAR LEASE &	8,113.07	GLOBE TELECOM AC 51964181	214.29
GLOBAL CITY CAR LEASE &	7,974.64	GLOBE TELECOM AC 51964181	214.29
GLOBAL CITY CAR LEASE &	9,126.11	GLOBE TELECOM AC 51964203	214.29
GLOBAL CITY CAR LEASE &	8,156.14	GLOBE TELECOM AC 51964203	214.29
GLOBAL CITY CAR LEASE &	7,912.07	GLOBE TELECOM AC 51964335	214.29
GLOBAL CITY CAR LEASE &	7,800.11	GLOBE TELECOM AC 51964335	214.29
GLOBAL CITY CAR LEASE &	7,157.04	GLOBE TELECOM AC 51964408	214.29
GLOBAL CITY CAR LEASE &	7,376.04	GLOBE TELECOM AC 51964408	214.29
GLOBAL CITY CAR LEASE &	7,644.43	GLOBE TELECOM AC 51964475	222.16
GLOBAL CITY CAR LEASE &	8,628.21	GLOBE TELECOM AC 51964475	214.29
GLOBAL CITY CAR LEASE &	7,849.82	GLOBE TELECOM AC 51964475	214.29
GLOBAL CITY CAR LEASE &	8,537.36	GLOBE TELECOM AC 51964505	214.29
GLOBAL CITY CAR LEASE &	9,559.50	GLOBE TELECOM AC 51964505	214.29
GLOBAL CITY CAR LEASE &	4,027.29	GLOBE TELECOM AC 51964505	214.29
GLOBAL CITY CAR LEASE &	6,767.14	GLOBE TELECOM AC 52116672	214.29
GLOBAL CITY CAR LEASE &	5,375.68	GLOBE TELECOM AC 52116729	321.43
GLOBAL CITY CAR LEASE &	5,174.25	GLOBE TELECOM AC 52142096	192.86
GLOBAL CITY CAR LEASE &	6,269.68	GLOBE TELECOM AC 52142126	192.86
GLOBAL CITY CAR LEASE &	1,819.18	GLOBE TELECOM AC 52142134	192.86
GLOBAL CITY CAR LEASE &	4,326.75	GLOBE TELECOM AC 52142134	128.57
GLOBAL CITY CAR LEASE &	4,425.43	GLOBE TELECOM AC 52142843	128.57
GLOBAL CITY CAR LEASE &	4,892.89	GLOBE TELECOM AC 52142916	128.57
GLOBAL CITY CAR LEASE &	4,049.14	GLOBE TELECOM AC 52142916	192.86
GLOBAL CITY CAR LEASE &	3,470.68	GLOBE TELECOM AC 52142967	192.86
GLOBAL CITY CAR LEASE &	3,319.07	GLOBE TELECOM AC 52142967	128.57
GLOBAL CITY CAR LEASE &	3,434.25	GLOBE TELECOM AC 52142975	128.57
GLOBAL CITY CAR LEASE &	3,314.25	GLOBE TELECOM AC 52143025	192.86
GLOBAL CITY CAR LEASE &	3,328.29	GLOBE TELECOM AC 52143025	128.57
GLOBAL CITY CAR LEASE &	6,248.79	GLOBE TELECOM AC 52143033	128.57
GLOBAL CITY CAR LEASE &	6,175.39	GLOBE TELECOM AC 52143033	192.86
GLOBAL CITY CAR LEASE &	12,453.32	GLOBE TELECOM AC 52143041	192.86
GLOBAL CITY CAR LEASE &	463.93	GLOBE TELECOM AC 52143068	192.86
GLOBAL CITY CAR LEASE &	8,327.68	GLOBE TELECOM AC 52143076	192.86
GLOBAL CITY CAR LEASE &	9,389.68	GLOBE TELECOM AC 52143092	192.86
GLOBAL CITY CAR LEASE &	6,387.75	GLOBE TELECOM AC 52143149	192.86
GLOBAL CITY CAR LEASE &	5,449.61	GLOBE TELECOM AC 52143149	128.57
GLOBAL CITY CAR LEASE &	5,480.79	GLOBE TELECOM AC 52143165	192.86
GLOBAL CITY CAR LEASE &	1,787.68	GLOBE TELECOM AC 52143211	128.57
GLOBAL CITY CAR LEASE &	5,236.82	GLOBE TELECOM AC 52143211	192.86
GLOBAL CITY CAR LEASE &	6,310.61	GLOBE TELECOM AC 52143254	128.57
GLOBAL CITY CAR LEASE &	1,493.57	GLOBE TELECOM AC 52143297	192.86
GLOBAL CITY CAR LEASE &	10,174.07	GLOBE TELECOM AC 52143297	128.57
GLOBAL CITY CAR LEASE &	14,436.21	GLOBE TELECOM AC 52143319	192.86
GLOBAL CITY CAR LEASE &	1,021.39	GLOBE TELECOM AC 52143319	128.57
GLOBAL CITY CAR LEASE &	652.5	GLOBE TELECOM AC 52146784	192.86
GLOBAL CITY CAR LEASE &	2,072.04	GLOBE TELECOM AC 52180265	1,748.10
GLOBAL CITY CAR LEASE &	908.57	GLOBE TELECOM AC 52180265	938.41
GLOBAL ONE SHUTTLE SERVICE	772.5	GLOBE TELECOM AC 52315659	321.43
GLOBE A/C 53648112	290.32	GLOBE TELECOM AC 52471952	192.86
GLOBE TELECOM	-320.23	GLOBE TELECOM AC 52471952	128.57
GLOBE TELECOM A/C 43789236	128.57	GLOBE TELECOM AC 52499385	192.86
GLOBE TELECOM A/C 43789236	128.57	GLOBE TELECOM AC 52499474	192.86
GLOBE TELECOM A/C 43834592	128.57	GLOBE TELECOM AC 52534261	290.32
GLOBE TELECOM A/C 45413292	128.57	GLOBE TELECOM AC 52534369	218.46
GLOBE TELECOM A/C 45413314	128.57	GLOBE TELECOM AC 52534369	290.32
GLOBE TELECOM A/C 45413314	128.57	GLOBE TELECOM AC 52556842	214.29

GLOBE TELECOM A/C 45413322	128.57	GLOBE TELECOM AC 52556842	214.29
GLOBE TELECOM A/C 45413322	128.57	GLOBE TELECOM AC 52556893	192.86
GLOBE TELECOM A/C 45413349	128.57	GLOBE TELECOM AC 52556923	192.86
GLOBE TELECOM A/C 45413349	128.57	GLOBE TELECOM AC 52556966	192.86
GLOBE TELECOM A/C 45413357	128.57	GLOBE TELECOM AC 52556974	192.86
GLOBE TELECOM A/C 45413357	128.57	GLOBE TELECOM AC 52556974	128.57
GLOBE TELECOM A/C 45517071	162.77	GLOBE TELECOM AC 52701281	569.63
GLOBE TELECOM A/C 45943062	128.57	GLOBE TELECOM AC 52701486	321.43
GLOBE TELECOM A/C 45943062	128.57	GLOBE TELECOM AC 52797467	192.86
GLOBE TELECOM A/C 46243048	128.57	GLOBE TELECOM AC 52797467	128.57
GLOBE TELECOM A/C 46243102	128.57	GLOBE TELECOM AC 52797564	192.86
GLOBE TELECOM A/C 46243129	128.57	GLOBE TELECOM AC 52797564	128.57
GLOBE TELECOM A/C 46328817	128.57	GLOBE TELECOM AC 52797564	128.57
GLOBE TELECOM A/C 46328817	128.57	GLOBE TELECOM AC 52797572	192.86
GLOBE TELECOM A/C 46328914	128.57	GLOBE TELECOM AC 52797572	128.57
GLOBE TELECOM A/C 46328914	128.57	GLOBE TELECOM AC 52797645	128.57
GLOBE TELECOM A/C 46328914	128.57	GLOBE TELECOM AC 52797645	192.86
GLOBE TELECOM A/C 46397029	128.57	GLOBE TELECOM AC 52797661	192.86
GLOBE TELECOM A/C 46397029	128.57	GLOBE TELECOM AC 52797661	128.57
GLOBE TELECOM A/C 46397029	128.57	GLOBE TELECOM AC 52797726	192.86
GLOBE TELECOM A/C 46397134	128.57	GLOBE TELECOM AC 52862005	192.86
GLOBE TELECOM A/C 46397134	128.57	GLOBE TELECOM AC 52862005	128.57
GLOBE TELECOM A/C 46877624	128.57	GLOBE TELECOM AC 52862137	192.86
GLOBE TELECOM A/C 46878655	128.57	GLOBE TELECOM AC 52862137	128.57
GLOBE TELECOM A/C 47406234	128.57	GLOBE TELECOM AC 52862188	192.86
GLOBE TELECOM A/C 47406234	128.57	GLOBE TELECOM AC 52862188	128.57
GLOBE TELECOM A/C 47406234	128.57	GLOBE TELECOM AC 52862196	128.57
GLOBE TELECOM A/C 47406242	128.57	GLOBE TELECOM AC 52862196	192.86
GLOBE TELECOM A/C 47406242	128.57	GLOBE TELECOM AC 52862234	128.57
GLOBE TELECOM A/C 47434572	128.57	GLOBE TELECOM AC 52862234	192.86
GLOBE TELECOM A/C 47434572	128.57	GLOBE TELECOM AC 52908625	192.86
GLOBE TELECOM A/C 47434874	128.57	GLOBE TELECOM AC 52908625	128.57
GLOBE TELECOM A/C 47434874	128.57	GLOBE TELECOM AC 52908668	192.86
GLOBE TELECOM A/C 47434904	128.57	GLOBE TELECOM AC 52908668	128.57
GLOBE TELECOM A/C 47434904	128.57	GLOBE TELECOM AC 52908684	128.57
GLOBE TELECOM A/C 47434971	204	GLOBE TELECOM AC 52908684	192.86
GLOBE TELECOM A/C 47565391	128.57	GLOBE TELECOM AC 52908714	192.86
GLOBE TELECOM A/C 47565529	204	GLOBE TELECOM AC 52908714	128.57
GLOBE TELECOM A/C 47565529	128.57	GLOBE TELECOM AC 52908765	192.86
GLOBE TELECOM A/C 48547915	128.57	GLOBE TELECOM AC 52908765	128.57
GLOBE TELECOM A/C 48547915	128.57	GLOBE TELECOM AC 53235071	222.86
GLOBE TELECOM A/C 48547931	128.57	GLOBE TELECOM AC 53235071	128.57
GLOBE TELECOM A/C 48547931	128.57	GLOBE TELECOM AC 53262869	803.57
GLOBE TELECOM A/C 48547931	128.57	GLOBE TELECOM AC 53262869	571.43
GLOBE TELECOM A/C 48547931	204	GLOBE TELECOM AC 53263105	571.43
GLOBE TELECOM A/C 48547958	128.57	GLOBE TELECOM AC 53263342	228.57
GLOBE TELECOM A/C 48547958	128.57	GLOBE TELECOM AC 53307447	307.14
GLOBE TELECOM A/C 48548105	128.57	GLOBE TELECOM AC 53337117	271.43
GLOBE TELECOM A/C 48548105	128.57	GLOBE TELECOM AC 53337117	214.29
GLOBE TELECOM A/C 48548512	128.57	GLOBE TELECOM AC 53413166	214.29
GLOBE TELECOM A/C 48548512	128.57	GLOBE TELECOM AC 53413328	-444.38
GLOBE TELECOM A/C 48548717	128.57	GLOBE TELECOM AC 53555696	141.01
GLOBE TELECOM A/C 48548741	128.57	GLOBE TELECOM AC 53555696	128.57
GLOBE TELECOM A/C 48548741	128.57	GLOBE TELECOM AC 53648066	290.32
GLOBE TELECOM A/C 48548792	128.57	GREAT YEAR INDUSTRIES CORP MAN	10,285.71
GLOBE TELECOM A/C 48548792	128.57	GUTHRIE-JENSEN CONSULTANTS, IN	11,520.00
GLOBE TELECOM A/C 48548792	128.57	GUTHRIE-JENSEN CONSULTANTS, IN	38,400.00
GLOBE TELECOM A/C 48548881	128.57	HEADSTRONG PHILIPPINES INC.	29,078.40
GLOBE TELECOM A/C 48549322	128.57	HEADSTRONG PHILIPPINES INC.	21,836.88
GLOBE TELECOM A/C 48549322	128.57	HEADSTRONG PHILIPPINES INC.	27,253.44
GLOBE TELECOM A/C 48549357	128.57	HEADSTRONG PHILIPPINES INC.	20,139.03
GLOBE TELECOM A/C 48549357	128.57	HEADSTRONG PHILIPPINES INC.	14,904.23
GLOBE TELECOM A/C 48549357	128.57	HEADSTRONG PHILIPPINES INC.	27,540.00
GLOBE TELECOM A/C 48549365	128.57	Hijumi Properties Inc.	181,389.60
GLOBE TELECOM A/C 48549365	128.57	I SYSTEMS INTEGRATORS, INC.	12,833.23
GLOBE TELECOM A/C 48549365	128.57	INNOVE A/C 830006736	19,387.20
GLOBE TELECOM A/C 48761623	128.57	INNOVE A/C 830006736	19,262.12
GLOBE TELECOM A/C 48761623	128.57	INNOVE A/C 831577230	138.75
GLOBE TELECOM A/C 48761755	128.57	INNOVE A/C 831577230	223.79
GLOBE TELECOM A/C 48761755	128.57	INNOVE A/C 831580222	138.75
GLOBE TELECOM A/C 48761828	128.57	INNOVE A/C 831580222	223.79
GLOBE TELECOM A/C 48761828	128.57	INNOVE A/C 831589775	223.79
GLOBE TELECOM A/C 48761828	128.57	INNOVE A/C 831685726	138.75
GLOBE TELECOM A/C 48761836	128.57	INNOVE A/C 831759062	138.75
GLOBE TELECOM A/C 48761836	128.57	INNOVE A/C 831797054	138.75
GLOBE TELECOM A/C 48761836	128.57	INNOVE A/C 831797054	223.79
GLOBE TELECOM A/C 49231709	128.57	INNOVE A/C 832233222	-5,682.58
GLOBE TELECOM A/C 49231776	128.57	INNOVE A/C 832233222	12,691.61
GLOBE TELECOM A/C 49231784	128.57	INNOVE A/C 832233222	4,800.00
GLOBE TELECOM A/C 49231849	128.57	INNOVE A/C 832233222	6,240.00

GLOBE TELECOM A/C 49231849	128.57	INNOVE A/C 832233222	5,574.19
GLOBE TELECOM A/C 49231903	128.57	INNOVE A/C 832588997	152.18
GLOBE TELECOM A/C 49235747	128.57	INNOVE A/C 832588997	111.38
GLOBE TELECOM A/C 49235747	204	INNOVE A/C 832989314	138.75
GLOBE TELECOM A/C 49301219	192.86	INNOVE A/C 832989314	138.75
GLOBE TELECOM A/C 49301219	192.86	INNOVE A/C 833014662	254.95
GLOBE TELECOM A/C 49301219	192.86	INNOVE A/C 834053949	138.75
GLOBE TELECOM A/C 49622201	128.57	INNOVE A/C 834053949	212.3
GLOBE TELECOM A/C 49622201	128.57	INNOVE A/C 834279883	138.75
GLOBE TELECOM A/C 49622252	128.57	INNOVE A/C 834279883	211.11
GLOBE TELECOM A/C 49622252	128.57	INNOVE A/C 834617514	166.05
GLOBE TELECOM A/C 49622279	128.57	INNOVE A/C 834620623	166.05
GLOBE TELECOM A/C 49622279	128.57	INNOVE AC 106796221	138.75
GLOBE TELECOM A/C 49622287	128.57	INNOVE AC 106796221	138.75
GLOBE TELECOM A/C 49622287	128.57	INNOVE AC 106797149	304.86
GLOBE TELECOM A/C 49622325	128.57	INNOVE AC 106797900	304.86
GLOBE TELECOM A/C 49622325	128.57	INNOVE AC 106858805	208.23
GLOBE TELECOM A/C 49622341	128.57	INNOVE AC 106858805	160.18
GLOBE TELECOM A/C 49622341	128.57	INNOVE AC 106884061	208.23
GLOBE TELECOM A/C 49622384	128.57	INNOVE AC 106884061	160.18
GLOBE TELECOM A/C 49622414	128.57	INNOVE AC 106886134	160.18
GLOBE TELECOM A/C 49622414	128.57	INNOVE AC 106886134	160.18
GLOBE TELECOM A/C 49622414	128.57	INNOVE AC 106886134	160.18
GLOBE TELECOM A/C 49622422	128.57	INNOVE AC 106922948	160.18
GLOBE TELECOM A/C 49622422	128.57	INNOVE AC 830635288	258.35
GLOBE TELECOM A/C 49622449	128.57	INNOVE AC 830635288	160.18
GLOBE TELECOM A/C 49622449	128.57	INNOVE AC 830635381	304.86
GLOBE TELECOM A/C 49622449	128.57	INNOVE AC 830635436	304.86
GLOBE TELECOM A/C 49622457	128.57	INNOVE AC 830744573	120.82
GLOBE TELECOM A/C 49622457	128.57	INNOVE AC 830744573	106.61
GLOBE TELECOM A/C 49622457	128.57	INNOVE AC 831003302	160.18
GLOBE TELECOM A/C 49622503	128.57	INNOVE AC 831003302	208.23
GLOBE TELECOM A/C 49622503	128.57	INNOVE AC 831003652	154.91
GLOBE TELECOM A/C 49622554	128.57	INNOVE AC 831003652	208.23
GLOBE TELECOM A/C 49622554	128.57	INNOVE AC 831003770	208.23
GLOBE TELECOM A/C 49622554	128.57	INNOVE AC 831003770	160.18
GLOBE TELECOM A/C 49622597	128.57	INNOVE AC 831003897	160.18
GLOBE TELECOM A/C 49622597	128.57	INNOVE AC 831003897	208.23
GLOBE TELECOM A/C 49622635	128.57	INNOVE AC 831004083	208.23
GLOBE TELECOM A/C 49887779	128.57	INNOVE AC 831004083	160.18
GLOBE TELECOM A/C 49888007	128.57	INNOVE AC 831004175	208.23
GLOBE TELECOM A/C 49888007	128.57	INNOVE AC 831498908	157.25
GLOBE TELECOM A/C 49888112	128.57	INNOVE AC 831498908	138.75
GLOBE TELECOM A/C 49888112	128.57	INNOVE AC 831502594	157.25
GLOBE TELECOM A/C 49888287	128.57	INNOVE AC 831502594	138.75
GLOBE TELECOM A/C 49888287	128.57	INNOVE AC 831577371	255.12
GLOBE TELECOM A/C 50038488	128.57	INNOVE AC 831577371	138.75
GLOBE TELECOM A/C 50038488	128.57	INNOVE AC 831577518	214.32
GLOBE TELECOM A/C 50038488	204	INNOVE AC 831578785	250.65
GLOBE TELECOM A/C 50040024	128.57	INNOVE AC 831579340	241.69
GLOBE TELECOM A/C 50040032	128.57	INNOVE AC 831579420	241.69
GLOBE TELECOM A/C 50082169	128.57	INNOVE AC 831580652	138.75
GLOBE TELECOM A/C 50082169	128.57	INNOVE AC 831589996	223.79
GLOBE TELECOM A/C 50310544	128.57	INNOVE AC 831589996	138.75
GLOBE TELECOM A/C 50310773	128.57	INNOVE AC 831613073	223.79
GLOBE TELECOM A/C 50310803	128.57	INNOVE AC 831613073	138.75
GLOBE TELECOM A/C 50310803	128.57	INNOVE AC 831685892	138.75
GLOBE TELECOM A/C 50310803	128.57	INNOVE AC 831685892	138.75
GLOBE TELECOM A/C 50574134	128.57	INNOVE AC 831758723	223.79
GLOBE TELECOM A/C 50574169	128.57	INNOVE AC 831758723	138.75
GLOBE TELECOM A/C 50574169	128.57	INNOVE AC 831759013	223.79
GLOBE TELECOM A/C 50574193	387.19	INNOVE AC 831759013	138.75
GLOBE TELECOM A/C 50574193	128.57	INNOVE AC 831759191	138.75
GLOBE TELECOM A/C 50574193	128.57	INNOVE AC 831759191	214.67
GLOBE TELECOM A/C 50574355	128.57	INNOVE AC 831759283	138.75
GLOBE TELECOM A/C 50612672	128.57	INNOVE AC 831759283	223.79
GLOBE TELECOM A/C 50612672	204	INNOVE AC 831819390	138.75
GLOBE TELECOM A/C 50612672	464.35	INNOVE AC 831819745	152.69
GLOBE TELECOM A/C 50612672	204	INNOVE AC 831819745	138.75
GLOBE TELECOM A/C 50613776	128.57	INNOVE AC 831819794	157.25
GLOBE TELECOM A/C 50613776	204	INNOVE AC 831819794	129.63
GLOBE TELECOM A/C 50613792	128.57	INNOVE AC 831819886	138.75
GLOBE TELECOM A/C 50613792	204	INNOVE AC 831819886	138.75
GLOBE TELECOM A/C 50613814	128.57	INNOVE AC 831962678	134.19
GLOBE TELECOM A/C 50613814	128.57	INNOVE AC 831962678	138.75
GLOBE TELECOM A/C 50613822	128.57	INNOVE AC 831962887	264.66
GLOBE TELECOM A/C 50613822	128.57	INNOVE AC 831963085	138.75
GLOBE TELECOM A/C 50613822	128.57	INNOVE AC 832009304	241.52
GLOBE TELECOM A/C 50613822	204	INNOVE AC 832231843	180.38
GLOBE TELECOM A/C 50613849	128.57	INNOVE AC 832231843	138.75

GLOBE TELECOM A/C 50613865	128.57	INNOVE AC 832231972	180.38
GLOBE TELECOM A/C 50613865	204	INNOVE AC 832232133	180.38
GLOBE TELECOM A/C 50613873	128.57	INNOVE AC 832232133	138.75
GLOBE TELECOM A/C 50613873	128.57	INNOVE AC 832232213	157.25
GLOBE TELECOM A/C 50613873	204	INNOVE AC 832232213	138.75
GLOBE TELECOM A/C 50613881	204	INNOVE AC 832232274	138.75
GLOBE TELECOM A/C 50613903	204	INNOVE AC 832232274	180.38
GLOBE TELECOM A/C 50613911	128.57	INNOVE AC 832388686	138.75
GLOBE TELECOM A/C 50613911	204	INNOVE AC 832388686	157.25
GLOBE TELECOM A/C 50613938	204	INNOVE AC 832588740	196.68
GLOBE TELECOM A/C 50613946	128.57	INNOVE AC 832588740	138.75
GLOBE TELECOM A/C 50613946	204	INNOVE AC 832589240	138.75
GLOBE TELECOM A/C 50613954	128.57	INNOVE AC 832589240	210.36
GLOBE TELECOM A/C 50613954	204	INNOVE AC 832589539	196.68
GLOBE TELECOM A/C 50613962	204	INNOVE AC 832589539	138.75
GLOBE TELECOM A/C 50613962	128.57	INNOVE AC 832589712	138.75
GLOBE TELECOM A/C 50613997	128.57	INNOVE AC 832619585	180.38
GLOBE TELECOM A/C 50613997	128.57	INNOVE AC 832620049	138.75
GLOBE TELECOM A/C 50613997	204	INNOVE AC 832620049	180.38
GLOBE TELECOM A/C 50614004	128.57	INNOVE AC 832686745	157.25
GLOBE TELECOM A/C 50614012	204	INNOVE AC 832744520	138.75
GLOBE TELECOM A/C 50614012	204	INNOVE AC 832744520	138.75
GLOBE TELECOM A/C 50614039	128.57	INNOVE AC 832762090	152.62
GLOBE TELECOM A/C 50614039	204	INNOVE AC 832762328	138.75
GLOBE TELECOM A/C 50614047	128.57	INNOVE AC 832762328	138.75
GLOBE TELECOM A/C 50614047	204	INNOVE AC 832876577	180.38
GLOBE TELECOM A/C 50658656	8.3	INNOVE AC 832877040	180.38
GLOBE TELECOM A/C 50799845	128.57	INNOVE AC 832877040	138.75
GLOBE TELECOM A/C 50799845	128.57	INNOVE AC 832878073	138.75
GLOBE TELECOM A/C 50799934	128.57	INNOVE AC 832878073	157.25
GLOBE TELECOM A/C 50799934	128.57	INNOVE AC 832881157	138.75
GLOBE TELECOM A/C 50799934	128.57	INNOVE AC 832881157	157.25
GLOBE TELECOM A/C 50799977	128.57	INNOVE AC 832882511	203.5
GLOBE TELECOM A/C 50799977	128.57	INNOVE AC 832882511	138.75
GLOBE TELECOM A/C 50799993	128.57	INNOVE AC 832929772	138.75
GLOBE TELECOM A/C 50799993	128.57	INNOVE AC 832929772	255.12
GLOBE TELECOM A/C 50800002	128.57	INNOVE AC 832989283	138.75
GLOBE TELECOM A/C 50800002	128.57	INNOVE AC 832993708	129.63
GLOBE TELECOM A/C 50832281	128.57	INNOVE AC 832993708	138.75
GLOBE TELECOM A/C 50832281	128.57	INNOVE AC 833013284	138.75
GLOBE TELECOM A/C 50832338	128.57	INNOVE AC 833013284	138.75
GLOBE TELECOM A/C 50883536	128.57	INNOVE AC 833013850	138.75
GLOBE TELECOM A/C 50883536	128.57	INNOVE AC 833013850	138.75
GLOBE TELECOM A/C 50883544	128.57	INNOVE AC 833015032	138.75
GLOBE TELECOM A/C 51251983	204	INNOVE AC 833015032	138.75
GLOBE TELECOM A/C 51251983	128.57	INNOVE AC 833015230	138.75
GLOBE TELECOM A/C 51252122	128.57	INNOVE AC 833015230	138.75
GLOBE TELECOM A/C 51252173	204	INNOVE AC 833127460	129.63
GLOBE TELECOM A/C 51252203	128.57	INNOVE AC 833127460	223.79
GLOBE TELECOM A/C 51252262	128.57	INNOVE AC 833127620	223.79
GLOBE TELECOM A/C 51252262	204	INNOVE AC 833127620	138.75
GLOBE TELECOM A/C 51252262	128.57	INNOVE AC 833128087	138.75
GLOBE TELECOM A/C 51424322	605.83	INNOVE AC 833128087	223.79
GLOBE TELECOM A/C 51424322	128.57	INNOVE AC 833128690	138.75
GLOBE TELECOM A/C 51424772	605.83	INNOVE AC 833128690	210.36
GLOBE TELECOM A/C 51424772	128.57	INNOVE AC 833128782	223.79
GLOBE TELECOM A/C 51424888	605.83	INNOVE AC 833128782	138.75
GLOBE TELECOM A/C 51424888	128.57	INNOVE AC 833129000	138.75
GLOBE TELECOM A/C 51771332	321.43	INNOVE AC 833129000	223.79
GLOBE TELECOM A/C 51771332	321.43	INNOVE AC 833325452	264.07
GLOBE TELECOM A/C 51771421	535.71	INNOVE AC 833335605	264.07
GLOBE TELECOM A/C 51771421	535.71	INNOVE AC 833336466	264.07
GLOBE TELECOM A/C 51771545	321.43	INNOVE AC 833339260	264.07
GLOBE TELECOM A/C 51771545	693.69	INNOVE AC 833340732	264.07
GLOBE TELECOM A/C 51771561	1,695.91	INNOVE AC 833342307	264.07
GLOBE TELECOM A/C 51771561	321.43	INNOVE AC 833342830	138.75
GLOBE TELECOM A/C 51771561	321.43	INNOVE AC 833342830	264.07
GLOBE TELECOM A/C 51963878	214.29	INNOVE AC 833342910	264.07
GLOBE TELECOM A/C 51963878	214.29	INNOVE AC 833343304	264.07
GLOBE TELECOM A/C 51963886	214.29	INNOVE AC 833570193	106.61
GLOBE TELECOM A/C 51963886	214.29	INNOVE AC 833570193	106.61
GLOBE TELECOM A/C 51963991	214.29	INNOVE AC 833592216	138.75
GLOBE TELECOM A/C 51963991	214.29	INNOVE AC 833592216	138.75
GLOBE TELECOM A/C 51963991	214.29	INNOVE AC 833986113	143.37
GLOBE TELECOM A/C 51964017	214.29	INNOVE AC 833986113	138.75
GLOBE TELECOM A/C 51964017	214.29	INNOVE AC 833986113	138.75
GLOBE TELECOM A/C 51964084	214.29	INNOVE AC 834268082	147.7
GLOBE TELECOM A/C 51964114	214.29	INNOVE AC 834268082	138.75
GLOBE TELECOM A/C 51964114	214.29	INNOVE COMMUNICATIONS A/C 8335	138.75
GLOBE TELECOM A/C 51964173	214.29	INNOVE COMMUNICATIONS A/C 8335	70.32

GLOBE TELECOM A/C 51964262	214.29	INNOVE COMMUNICATIONS A/C 8338	138.75
GLOBE TELECOM A/C 51964262	214.29	INNOVE COMMUNICATIONS A/C 8338	138.75
GLOBE TELECOM A/C 51964327	214.29	INNOVE COMMUNICATIONS INC 8330	138.75
GLOBE TELECOM A/C 51964424	214.29	JEBSEN & JESSEN COMMUNICATIONS	16,422.00
GLOBE TELECOM A/C 51964424	214.29	JOHN CLEMENTS CONSULTANTS, INC	310,714.29
GLOBE TELECOM A/C 51964432	214.29	KAPIENT PHILIPPINES INC.	13,860.00
GLOBE TELECOM A/C 51964432	214.29	LANTRO PHILS INC	1,116.33
GLOBE TELECOM A/C 51964432	214.29	LJ SYNERGY INCORPORATED	17,957.14
GLOBE TELECOM A/C 51964513	214.29	MAXICARE HEALTHCARE CORP	-1,493.73
GLOBE TELECOM A/C 51964513	214.29	MAXICARE HEALTHCARE CORP	-827.3
GLOBE TELECOM A/C 52142444	128.57	MAXICARE HEALTHCARE CORP	2,805.25
GLOBE TELECOM A/C 52142444	128.57	MAXICARE HEALTHCARE CORP	567.28
GLOBE TELECOM A/C 52142444	192.86	MAXICARE HEALTHCARE CORP	2,481.89
GLOBE TELECOM A/C 52142983	192.86	MERCURY DRUG CORPORATION	5,254.15
GLOBE TELECOM A/C 52143157	128.57	MISNET EDUCATION INC.	2,455.36
GLOBE TELECOM A/C 52144722	128.57	PACIFIC RESOURCES CORPORATION	136,584.00
GLOBE TELECOM A/C 52144722	192.86	PHILSTAR DAILY, INC	24,261.12
GLOBE TELECOM A/C 52144722	128.57	PRECISION BLACK TONER INC.	1,388.57
GLOBE TELECOM A/C 52146474	192.86	Premium Security & Investigation	76.63
GLOBE TELECOM A/C 52146474	128.57	PSEI FIRESAFETY SYSTEM	6,486.43
GLOBE TELECOM A/C 52146733	192.86	QUEST BROADCASTING INCORPORATE	24,000.00
GLOBE TELECOM A/C 52146741	192.86	REACH MARKETING	117.87
GLOBE TELECOM A/C 52146776	192.86	RELECH TRADING	1,461.43
GLOBE TELECOM A/C 52146776	128.57	REUTERS LIMITED	20,262.73
GLOBE TELECOM A/C 52146792	128.57	REUTERS LIMITED	20,556.77
GLOBE TELECOM A/C 52146792	128.57	REUTERS LIMITED	-1,417.29
GLOBE TELECOM A/C 52146792	192.86	ROADMAPS & BEYOND, INC.	9,600.00
GLOBE TELECOM A/C 52316086	321.43	ROADMAPS & BEYOND, INC.	7,920.00
GLOBE TELECOM A/C 52316086	701.57	ROADMAPS & BEYOND, INC.	13,602.00
GLOBE TELECOM A/C 52439641	911.82	ROADMAPS & BEYOND, INC.	4,200.00
GLOBE TELECOM A/C 52439943	453.48	ROADMAPS & BEYOND, INC.	8,760.00
GLOBE TELECOM A/C 52439943	321.43	Shellsoft Technology Corp.	2,631.16
GLOBE TELECOM A/C 52470999	192.86	SKYCABLE CORPORATION	3,360.00
GLOBE TELECOM A/C 52470999	128.57	SMART COMMUNICATIONS, INC	192.86
GLOBE TELECOM A/C 52471189	192.86	TOYOTA SHAW INC	154,821.43
GLOBE TELECOM A/C 52471855	192.86	TRANE PHILIPPINES	2,400.00
GLOBE TELECOM A/C 52471863	192.86	TRANE PHILIPPINES	2,400.00
GLOBE TELECOM A/C 52471901	192.86	Vicencio Printing Services	396.42
GLOBE TELECOM A/C 52471995	192.86	Vicencio Printing Services	1,894.29
Total			3,529,526.80

In addition, the Court finds no compelling reason to re-open the trial for the presentation of supplemental evidence. The Court has already given petitioner sufficient time to present evidence as it deems sufficient to substantiate a claim for refund. It bears stressing that tax refunds are in the nature of tax exemptions. As such, they are regarded as in derogation of sovereign authority and to be construed in *strictissimi juris* against the person or entity claiming the exemption.¹¹

WHEREFORE, in view of the foregoing, the Court Motion for Partial Reconsideration (Re: Decision promulgated on 16 September 2014) filed by respondent is hereby **DENIED**, while the Omnibus Motion filed by petitioner is resolved, as follows:

1. Motion for Partial Reconsideration is hereby **DENIED** for lack of merit. However, the dispositive portion of the Decision dated September 16, 2014 is hereby modified as to

¹¹ Commissioner of Internal Revenue v. Procter and Gamble Phil. Mfg. Corp., G.R. No. 66838, December 2, 1991, 204 SCRA 377; Commissioner of Internal Revenue v. S.C. Johnson & Son, Inc., G.R. No. 127105, June 25, 1999, 309 SCRA 87.

the amount granted for the issuance of tax credit certificate to **Php15,856,069.97**;¹²

2. Motion to Reopen Trial for Presentation of Supplemental Evidence is hereby **DENIED**.
3. Motion for Clarification is hereby **GRANTED**.

SO ORDERED.


LOVELL R. BAUTISTA
Associate Justice


ESPERANZA R. FABON-VICTORINO
Associate Justice


MA. BELEN M. RINGPIS-LIBAN
Associate Justice

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Input VAT claimed for refund		Php 34,107,284.30
Less: Disallowances		
Unamortized Input VAT on Capital Goods exceeding P1M	Php 1,019,622.18	
Input VAT on purchases of goods and services other than capital goods	14,068,220.19	15,087,842.37
Valid Input VAT		Php 19,019,441.93
Less: Output VAT		1,353,651.47
Valid Excess Input VAT		Php 17,665,790.46

(Php1,048,052.79 less Php28,430.61)

Valid Zero-Rated Sales/Receipts	Php1,600,232,233.09
Divided by Total Reported Zero-Rated Sales/Receipt	1,782,873,522.27
Multiply by Valid Excess Input VAT	17,665,790.46
Excess Input VAT attributable to the Valid Zero-Rated Sales/Receipts	Php15,856,069.97

