

## TAX ALERT

June 1-30, 2021

### Supreme Court Decisions

**THE ISSUANCE OF A DEMAND LETTER BY THE COLLECTOR OF CUSTOMS WHICH IS BASED ON THE COMPUTATION OF DEFICIENCY TAXES FROM THE CIR IS PROPERLY CONSTRUED AS THE CIR'S FINAL DECISION WHICH MAY BE SUBJECT OF AN APPEAL WITH THE CTA, AS OPPOSED TO THE ISSUANCE OF AN IMPORT ENTRY AND INTERNAL REVENUE DECLARATION, AKIN TO A PRELIMINARY ASSESSMENT, AND IS SUBJECT TO REVIEW BY THE COLLECTOR OF CUSTOMS BEFORE IT IS BROUGHT TO THE CTA.** *Commissioner of Internal Revenue v. Court of Tax Appeals (First Division) and Pilipinas Shell Petroleum Corporation. G.R. Nos 210501/211294/2124901 dated March 15, 2021 (uploaded July 8, 2021)*

**PROVISIONAL REMEDIES TO EFFECTIVELY RESTRAIN THE COLLECTION OF TAXES ARE ANCILLARY TO THE CTA'S EXERCISE OF JURISDICTION.** A taxpayer may seek the following provisional remedies before the CTA: (a) a motion to suspend the direct enforcement of the tax assessment pursuant to the special provision of the CTA law; and/or (b) the ordinary injunctive writs (Temporary Restraining Order/Writ of Preliminary Injunction [TRO/WPI]) based on the suppletory application of the Rules of Court against the implementation of the tax statute or issuance assailed. To note, since the latter remedy (TRO/WPI) is meant to enjoin the implementation of a tax statute or issuance, a successful application thereof will indirectly result in the suspended implementation of a tax assessment or demand for payment of taxes, if any, springing from the tax statute or issuance. *Commissioner of Internal Revenue v. Court of Tax Appeals (First Division) and Pilipinas Shell Petroleum Corporation. G.R. Nos 210501/211294/2124901 dated March 15, 2021 (uploaded July 8, 2021)*

### Court of Tax Appeals Decisions

**IT IS WELL-SETTLED IN OUR JURISPRUDENCE THAT THE ABSENCE OF A LETTER OF AUTHORITY (LOA) IS A VIOLATION OF THE TAXPAYER'S RIGHT TO DUE PROCESS, WHICH RENDERS THE ASSESSMENT NULL AND VOID.** A Letter Notice is different from an LOA and the issuance of the former does not equate to the issuance of the latter to validate an otherwise void assessment. *Yan An Cargo Corp. v. Commissioner of Internal Revenue, C.T.A. Case No. 9865, dated June 1, 2021*

**A PROTEST LETTER REQUESTING FOR REINVESTIGATION, WITH ATTACHED RELEVANT SUPPORTING DOCUMENTS AND WITH NO FURTHER INDICATION THAT THE TAXPAYER INTENDS TO SUBMIT MORE, IS SUFFICIENT**

**COMPLIANCE WITH THE REQUIRED SUBMISSION OF ALL RELEVANT SUPPORTING DOCUMENTS WITHIN SIXTY (60) DAYS FROM FILING OF THE PROTEST.** The BIR's argument that the assessment notices had become final and demandable for failure of the taxpayer to submit all relevant supporting documents within sixty (60) days from filing of protest is bereft of merit considering that the taxpayer had already attached the relevant documents to its protest. The BIR cannot demand the type of documents that the taxpayer should submit as this rests solely on the discretion of the latter. *8196 Convenience Corporation v. Commissioner of Internal Revenue, CTA Case No. 9818, dated June 10, 2021.*

**THE BIR'S SERVICE OF THE PRELIMINARY ASSESSMENT NOTICE AND FORMAL LETTER OF DEMAND WITH ASSESSMENT NOTICES TO THE TAXPAYER'S OLD ADDRESS THROUGH REGISTERED MAIL, DESPITE PRIOR KNOWLEDGE OF THE TAXPAYER'S CURRENT ADDRESS, CANNOT BE CONSTRUED AS A VALID SERVICE, THUS, INVALIDATING THE ENTIRE ASSESSMENT.** *Fabtech Kitchens Unlimited, Inc. v. Commissioner of Internal Revenue, CTA Case No. 9589 dated June 23, 2021.*

**A PRELIMINARY COLLECTION LETTER FROM THE BIR IS CONSTRUED AS THE BIR'S FINAL DECISION ON DISPUTED ASSESSMENT THAT COULD BE SUBJECT OF AN APPEAL.** *Dennis M. Yap v. Bureau of Internal Revenue, CTA EB Case No. 2272, dated June 15, 2021.*

**THE TAXPAYER'S LETTER-REQUEST TO HOLD IN ABEYANCE THE SERVICE AND EXECUTION OF WARRANTS OF DISTRRAINT/LEVY, WHICH WAS GRANTED BY THE BIR, DOES NOT SUSPEND THE PRESCRIPTIVE PERIOD FOR COLLECTION.** *Commissioner of Internal Revenue v. Standard Insurance Co., Inc., CTA EB Case No. 2090, dated June 21, 2021.*

**THE LACK OF A MISSION ORDER, BEFORE THE ISSUANCE OF THE 48-HOUR NOTICE, 5-DAY VAT COMPLIANCE NOTICE, AND CLOSURE ORDER, TO THE "NON-COMPLIANT TAXPAYER", DURING OPLAN KANDADO VIOLATES THE TAXPAYER'S RIGHT TO DUE PROCESS.** *iScale Solutions, Inc. v. Commissioner of Internal Revenue, Regional Director Glen A. Geraldino & Revenue District Officer Mahinarado G. Mailig, CTA Case No. 9845, dated June 30, 2021.*

**TEMPORARILY UNLOADING GOODS IN A SPECIAL ECONOMIC ZONE IS NOT TAXABLE AS THE ZONE IS NOT CONSIDERED PART OF THE PHILIPPINE CUSTOMS TERRITORY.** Temporarily unloading goods in the Subic Special Economic Zone for transshipment purposes on account of the shipper's failure to deliver the goods to their original destination is not subject to taxes and duties. *Republic of the Philippines v. Amira C. Foods International DMCC, CTA EB Case No. 2210 dated June 3, 2021.*

**IT IS NOT ONLY THE PHILIPPINE AMUSEMENT AND GAMING CORPORATION (PAGCOR) THAT IS EXEMPT FROM PAYING INCOME TAXES, WHETHER LOCAL OF NATIONAL, WITH RESPECT TO INCOME ON GAMING OPERATION BUT ALSO PAGCOR'S LICENSEES AND FRANCHISEES.** *Commissioner of Internal Revenue v. Premium Leisure and Amusement, Inc. (PLAI), C.T.A. EB Case No. 2226 (C.T.A. Case No. 9572), dated June 14, 2021.*

**OVERPAYMENT OF TAXES RESULTING FROM MULTIPLE ATTEMPTS TO PAY ELECTRONICALLY VIA BIR ELECTRONIC FILING AND PAYMENT SYSTEM (EFPS) FALLS UNDER THE DEFINITION OF ERRONEOUSLY OR ILLEGALLY PAID TAX; THUS, THE PROPER SUBJECT OF A REFUND CLAIM.** *Empress Dental Laboratories, Inc. v. Commissioner of Internal Revenue, CTA Case No. 10186, dated June 7, 2021.*

**THE TAXPAYER'S FAILURE TO SUBMIT ALL THE REQUIREMENTS ENUNCIATED IN REVENUE MEMORANDUM ORDER (RMO) NO. 53-98, IN RELATION TO A CLAIM FOR REFUND OR ISSUANCE OF TAX CREDIT CERTIFICATE OF UNUTILIZED CREDITABLE WITHHOLDING TAXES, DOES NOT RESULT IN THE OUTRIGHT DENIAL OF ITS CLAIM FOR TAX REFUND OR CREDIT.** RMO No. 53-98 is merely a guide to revenue officers as to what documents they may require taxpayers to present upon audit of their tax liabilities and is never intended to be a benchmark in determining whether the documents submitted by a taxpayer are actually complete to support a claim for tax credit or refund. Moreover, the Supreme Court categorically ruled that the failure of the taxpayer to submit the requirements listed under RMO No. 53-98 is not fatal to its claim for tax credit or refund. *Tullet Prebon (Philippines) Inc. v. Commissioner of Internal Revenue, CTA Case No. 9562 dated June 17, 2021.*

**THE RIGHT OF A TAXPAYER TO REFUND ITS PREPAID EXCISE TAX ON INTERNAL REVENUE STAMPS REQUISITIONED THROUGH THE BIR'S INTERNAL REVENUE STAMP INTEGRATED SYSTEM (IRSIS) RESULTS FROM ITS CESSATION OF BUSINESS RATHER THAN THE APPLICATION OF SEC. 204(C) AND 229 OF THE 1997 NIRC, AS AMENDED, ON TAXES ERRONEOUSLY OR ILLEGALLY RECEIVED.** The taxpayer desiring to recover the unused excise tax deposit through the IRSIS must prove its cessation of business operations which triggers its right to claim the refund, as the unused excise tax deposit does not fall under the definition of taxes erroneously or illegally received by the BIR. *British American Tobacco (Philippines), Limited v. Commissioner of Interval Revenue, CTA Case No. 9998 dated June 28, 2021.*

**DENIAL IN A CRIMINAL PROCEEDING UNDER SEC. 255 OF THE 1997 NIRC, AS AMENDED, IS WEAK AND UNRELIABLE.** By failing to take affirmative actions to prove his lack of prior knowledge or active participation in the registration of his business (e.g. proving that his signature was forged or his personal credentials were stolen), the CTA construed the actions of the accused of failing to file returns as willful. *People of the Philippines vs. Ronnel Lampa De Guzman (Lucky Sea Trading), CTA Crim. Case No. O-690 and O-691, dated June 9, 2021.*

**THE POWER TO PREVENT THE AUCTION OF A PROPERTY SUBJECT OF A PROBATE PROCEEDING IS LODGED WITH THE PROBATE COURT AND NOT WITH THE CTA.** Since the main issue of excluding a certain property among the estate of a decedent does not involve the interpretation and application of the National Internal Revenue Code of 1997 ("1997 NIRC"), as amended, and other related laws administered by the BIR, the CTA has no jurisdiction to issue orders ancillary to the administration of the estate including injunctive

relief. The prerogative rests with the probate court. *Tamparong, Jr. v. Commissioner of Internal Revenue, C.T.A. Case No. 9520, dated June 8, 2021.*

**THE FILING OF TWO MOTIONS FOR RECONSIDERATION OF THE FINAL DECISION ON DISPUTED ASSESSMENT WITH THE COMMISSIONER OF INTERNAL REVENUE (CIR) AND THE REGIONAL DIRECTOR IS NOT FORUM-SHOPPING.** The rule on forum-shopping applies only to judicial cases or proceedings, and not to administrative cases. *8196 Convenience Corporation v. Commissioner of Internal Revenue, CTA Case No. 9818, dated June 10, 2021.*

**DIVIDEND INCOME EARNED BY A HOLDING COMPANY IS NOT SUBJECT TO LOCAL BUSINESS TAX (LBT).** Dividend income, being a passive income, is subject to LBT only if it is earned by banks and financial institutions. The imposition of LBT on dividend income earned by a holding company is considered an income tax which is prohibited under Section 133(a) of the Local Government Code (LGC) of 1991, as amended. *Makati City and Hon. Jesusa E. Cuneta, in her capacity as City Treasurer v. Metro Pacific Tollways Corporation, CTA EB Case No. 2217, CTA AC No. 204, dated June 14, 2021.*

**IF A NOTICE OF ASSESSMENT IS ISSUED BY A LOCAL GOVERNMENT UNIT, THE TAXPAYER IS REQUIRED TO FILE A PROTEST WITHIN 60 DAYS FROM NOTICE, EVEN IF THE TAXPAYER OPTS TO PAY THE AMOUNT ASSESSED WITHIN THE SAME PERIOD, PURSUANT TO SECTION 195 OF THE LGC OF 1991. ON THE CONTRARY, REFUND OF TAXES PAID PURSUANT TO SECTION 196 OF THE LGC OF 1991, WHERE NO PROTEST IS REQUIRED, APPLIES IF NO NOTICE OF ASSESSMENT WAS ISSUED TO THE TAXPAYER.** *Makati City and Hon. Jesusa E. Cuneta, in her capacity as City Treasurer v. Metro Pacific Tollways Corporation, CTA EB Case No. 2217, CTA AC No. 204, dated June 14, 2021.*

**THE CTA HAS JURISDICTION TO PASS UPON THE CONSTITUTIONALITY OR VALIDITY OF A TAX LAW OR REGULATION WHEN RAISED BY THE TAXPAYER AS A DEFENSE IN DISPUTING OR CONTESTING AN ASSESSMENT OR CLAIMING A REFUND.** *Petron Corporation v. Commissioner of Internal Revenue, CTA Case No. 9751, 9813, and 9848, dated June 21, 2021.*

**ALKYLATE CANNOT BE CLASSIFIED OR EMBRACED UNDER THE CATCH-ALL ITEM - "OTHER SIMILAR PRODUCTS OF DISTILLATION" UNDER SECTION 148(E) OF THE 1997 NIRC, AS AMENDED.** Alkylate in itself is not a product of distillation. Although one of the raw materials of Alkylate - Isobutane -- can be a product of distillation, this does not justify the imposition of excise tax thereon. Section 148(e) of the 1997 NIRC, as amended, imposes tax on the following products: naphtha, regular gasoline and other similar products of distillation," and not on the ingredients or raw materials to come up with naphtha, regular gasoline and other similar products. Stated otherwise, what is being subjected to 148(e) of the 1997 NIRC, as amended, are the aforesaid three (3) finished products, and not the ingredients used to produce them. *Petron Corporation v. Commissioner of Internal Revenue, CTA Case No. 9751, 9813, and 9848, dated June 21, 2021.*

**BIR Issuances**

**AMENDING CERTAIN PROVISIONS OF REVENUE REGULATIONS NO. (“REV. REGS.”) 4-2021, WHICH IMPLEMENTED THE VALUE-ADDED TAX (VAT) AND PERCENTAGE TAX PROVISIONS UNDER REPUBLIC ACT (RA) NO. 11534, OR THE “CORPORATE RECOVERY AND TAX INCENTIVES FOR ENTERPRISES ACT” (CREATE).**

The following amendments to Revenue Regulations (RR) No. 4-2021 were made:

1. The VAT-exempt threshold under RA No. 10963, or the Tax Reform for Acceleration and Inclusion Law (TRAIN Law), of Two Million Pesos (P2,000,000.00) for sale of house and lot and other residential dwellings is adjusted to P3,199,200.00 beginning January 1, 2021.
2. The release of imported Personal Protective Equipment shall not be subject to an ATRIG.
3. Percentage taxpayers who have overpaid taxes as a result of the decrease of tax rate are allowed for a tax refund in the event that:
  - a. The taxpayer shifted from non-VAT to VAT-registered status; or
  - b. The taxpayer has opted to avail of the eight percent (8%) income tax rate at the beginning of TY 2021. *Revenue Regulations No. 8-2021 dated June 11, 2021.*

**AMENDING CERTAIN PROVISIONS OF REV. REGS. 16-2005, AS AMENDED BY REV. REGS. 13-2018 AND AS FURTHER AMENDED BY REV. REGS. 26-2018, TO IMPLEMENT THE IMPOSITION OF TWELVE PERCENT (12%) VALUE-ADDED TAX (VAT) ON TRANSACTIONS COVERED UNDER SECTION 106 (A)(2)(a) SUBPARAGRAPHS (3), (4), AND (5), AND SECTION 108(B) SUBPARAGRAPHS (1) AND (5) OF THE 1997 NIRC, AS AMENDED BY REPUBLIC ACT NO. (“RA”) 10963 (TRAIN LAW). *Revenue Regulations No. 9-2021 dated June 9, 2021.***

The following transactions that were previously taxed at zero percent (0%) VAT shall now be subject to 12%:

- a. Those transactions considered as export sale under subparagraphs (3), (4), and (5) of Section 106(A)(2) of the Tax Code of 1997, as amended, to wit:
  - i. Sale of raw materials or packaging materials to a non-resident buyer for delivery to a resident local export-oriented enterprise to be used in manufacturing, processing, packing or repacking in the Philippines of the said buyer's goods and paid for in acceptable foreign currency, and accounted for in accordance with the rules and regulations of the Bangko Sentral ng Pilipinas (BSP) [Sec. 106(A)(2)(a)(3)];
  - ii. Sale of raw materials or packaging materials to export-oriented enterprise whose export sales exceed seventy percent (70%) of total annual production [Sec. 106(A)(2)(a)(4)]; and
  - iii. Those considered export sales under Executive Order No. 226 (Omnibus Investments Code of 1987) and other special laws [Sec. 106(A)(2)(a)(5)].
- b. The sale of services and use or lease of properties under subparagraphs (1) and (5) of Section 108(B) of the Tax Code of 1997, as amended:
  - i. Processing, manufacturing or repacking goods for other persons doing business outside the Philippines which goods are subsequently exported, where the services

are paid for in acceptable foreign currency and accounted for in accordance with the rules and regulations of the BSP [Sec. 108(B)(1)]; and

ii. Services performed by subcontractors and/or contractors in processing, converting, or manufacturing goods for an enterprise whose export sales exceed seventy percent (70%) of the total annual production [Sec. 108(B)(5)].

(N.B. The implementation of Revenue Regulations No. 9-2021 has been deferred per Revenue Regulations No. 15-2021)

**AMENDS SECTION 10 OF REV. REGS. 20-2018 RELATIVE TO THE OUTRIGHT EXEMPTION GRANTED TO THE EXPORTATION OF SWEETENED BEVERAGES PRODUCTS** Rev. Regs. 20-2018 is now amended by removing the outright exemption from excise taxes of sweetened beverages products for export, and rather, allowing taxpayers to either claim a tax credit/refund or product replenishment scheme. *Revenue Regulations No. 10-2021 dated January 4, 2021.*

**IMPLEMENTING THE TAX EXEMPTIONS AND PRIVILEGES GRANTED UNDER RA 11523, OTHERWISE KNOWN AS THE "FINANCIAL INSTITUTIONS STRATEGIC TRANSFER (FIST) ACT"** RA 11523, which repeals RA 9182 or the Special Purpose Vehicle Law, authorizes the establishment of FIST Corporations (FISTC) that are enabled to purchase Non-Performing Loans (NPLs) and Real and Other Properties Acquired (ROPAs) from distressed financial institutions. The tax exemptions granted by RA 11523 primarily refer to the transfer of the NPLs and ROPAs to the FISTCs which involve documentary stamp tax, capital gains tax, creditable withholding tax, and value-added tax. *Revenue Regulations No. 11-2021 dated June 23, 2021.*

**PRESCRIBING THE POLICIES AND GUIDELINES ON THE UTILIZATION OF THE TAX PAYMENT CERTIFICATE ISSUED BY THE DEPARTMENT OF TRADE AND INDUSTRY-BOARD OF INVESTMENT (DTI-BOI) EVIDENCING THE AVAILMENT OF THE FISCAL SUPPORT FOR THE ELIGIBLE AND REGISTERED PARTICIPANTS OF THE COMPREHENSIVE AUTOMOTIVE RESURGENCE STRATEGY (CARS) PROGRAM UNDER EXECUTIVE ORDER NO. 182, SERIES OF 2015.** *Revenue Regulations 12-2021 dated June 23, 2021.*

**IMPLEMENTING THE PENALTY PROVISIONS UNDER SECTIONS 76, 77, 78, 79 AND 80 OF RA 10963, ALSO KNOWN AS THE TAX REFORM FOR ACCELERATION AND INCLUSION LAW, AMENDING SECTIONS 254 AND 264 OF, AND ADDING SECTIONS 264-A, 264-B, AND 265-A TO THE 1997 NIRC, AS AMENDED.** RA 10963 increased the penalty for: 1) Attempt to Evade or Defeat Tax and 2) Violations Related to the Printing of Receipts or Invoices and Other Violations; while it criminalized the following acts: 1) Failure to Transmit Sales Data Entered on Cash Register Machine (CRM)/Point of Sales System (POS) Machines to the BIR's Electronic Sales Reporting System; 2) Purchase, Use, Possession, Sale or Offer to Sell, Installment, Transfer, Update, Upgrade, Keeping or Maintaining of Sales Suppression Devices 3) Offenses Relating to Fuel Marking. *Revenue Regulations No. 013-2021 dated June 23, 2021*

**ANNOUNCES THE AVAILABILITY OF THE NEW BUSINESS REGISTRATION (NEWBIZREG) PORTAL.** *Revenue Memorandum Circular No. 73-2021 issued on June 3, 2021.*

**PRESCRIBES THE STANDARD POLICY AND GUIDELINES ON THE USE OF BIR FORM NO. 0605 FOR EXCISE TAX PURPOSES.** *Revenue Memorandum Circular No. 75-2021 issued on June 7, 2021.*

**CLARIFIES THE ILLUSTRATIVE EXAMPLES IN THE COMPUTATION OF CORPORATE INCOME TAX UNDER SECTION 3(B) AND 3(D) OF REV. REGS. 5-2021.** In the illustration for proprietary educational institution and Regional Operating Headquarters (ROHQ) under the said Sections of the RR, the Income Tax due and the gross income were inadvertently written to be in the amount of P 1,000,000.00 and P 558,500,000.00 instead of the correct amount of P 100,000.00 and P 58,500,000.00, respectively, which was shown in the Circular. The Circular also clarifies that the 1% Income Tax rate for proprietary educational institutions and the 1% Minimum Corporate Income Tax (MCIT) for ROHQ shall be imposed only for the period July 1, 2020 until June 30, 2023, and January 1, 2022 to June 30, 2023, respectively. Thus, beginning July 1, 2023, the Income Tax rate for proprietary educational institutions and the MCIT shall revert to ten percent (10%) and two percent (2%), respectively. *Revenue Memorandum Circular No. 75-2021 issued on June 7, 2021.*

**CLARIFIES CERTAIN PROVISIONS OF REVENUE MEMORANDUM ORDER NO. 14-2021.** RMC No. 77-2021 clarifies that the income payor must submit all the documents related to the Request for Confirmation (RC) in relation to availing of the tax treaty rates, at any time after the close of the taxable year but not later than the last day of the fourth month following the close of such taxable year when the income is paid or becomes payable, or when the expense/asset is accrued or recorded in the books, whichever comes first. However, in relation to capital gains, the RC must be submitted not later than the last day of the fourth month following the close of the taxable year when the income is paid or when the transaction is consummated. *Revenue Memorandum Circular No. 77-2021 issued on June 15, 2021,*

**CIRCULARIZES THE CONSOLIDATED PRICE OF SUGAR AT MILLSITE FOR THE MONTH OF APRIL 2021 CONTAINED IN OPERATIONS MEMORANDUM NOS. 25-2021, 26-2021, 27-2021 AND 28-2021.** *Revenue Memorandum Circular No. 78-2021 issued on June 17, 2021.*

**CLARIFIES THE SUSPENSION OF THE STATUTE OF LIMITATIONS ON ASSESSMENT AND COLLECTION OF TAXES DUE TO THE DECLARATION OF “QUARANTINE” IN METRO MANILA, BULACAN, CAVITE, LAGUNA AND RIZAL (NCR PLUS), AND OTHER APPLICABLE JURISDICTIONS.** The running of the statute of limitations in assessment and collection shall be suspended in areas placed under enhanced community quarantine (ECQ), as stated in RMC No. 52-2021, as well as modified enhanced community quarantine (MECQ). With such suspension, the concerned offices of the Bureau shall be provided with additional days for them to issue the Assessment Notices, Warrants of Distrainment and/or Levy, as well as Warrants of Garnishment, to enforce collection of deficiency taxes against taxpayers covered by the ECQ and MECQ declaration, which is equivalent to the number of days

the particular area was placed under ECQ and MECQ, plus sixty (60) days from its lifting. The matrix showing the extended due date computation for areas placed under ECQ and MECQ is specified in the Circular. *Revenue Memorandum Circular No. 80-2021 issued on June 29, 2021.*

Note: The information provided herein is general and may not be applicable in all situations. It should not be acted upon without specific legal advice based on particular situations. If you have any questions, please feel free to contact us at any of the indicated e-mail address:

Carlos G. Baniqued	<a href="mailto:cgbaniqued@baniquedlaw.com">cgbaniqued@baniquedlaw.com</a>
Terence Conrad H. Bello	<a href="mailto:thbello@baniquedlaw.com">thbello@baniquedlaw.com</a>
Emma Malou L. Gan	<a href="mailto:eulim@baniquedlaw.com">eulim@baniquedlaw.com</a>
Agnes Bianca Mendoza	<a href="mailto:almendoza@baniquedlaw.com">almendoza@baniquedlaw.com</a>
Casiano V. Flores	<a href="mailto:cvflores@baniquedlaw.com">cvflores@baniquedlaw.com</a>
Mark Roland C. Domingo	<a href="mailto:mcdomingo@baniquedlaw.com">mcdomingo@baniquedlaw.com</a>
Carla Patrice S. Cucueco	<a href="mailto:cscucueco@baniquedlaw.com">cscucueco@baniquedlaw.com</a>
Patricia D. Ibanez	<a href="mailto:pdibanez@baniquedlaw.com">pdibanez@baniquedlaw.com</a>
Kryztelle Pearl V. Gabay	<a href="mailto:kvgabay@baniquedlaw.com">kvgabay@baniquedlaw.com</a>

Past issues of our Tax Alert are available at our website at [www.baniquedlaw.com](http://www.baniquedlaw.com)