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April 3, 2002

Securities and Exchange Commission
Office of International Corporate Finance
450 Fifth Street, N.W.
Washington, D.C. 20549
U. S. A.
Attn: Mr. Paul Dudek

SUPPL

02 APR -4 AM 8:00

Re: File Number: 82-5233

Dear Sirs:

Pursuant to Rule 12g3-2(b)(1)(iii) under the Securities Exchange Act of 1934, we, as legal advisers to BELLUNA CO., LTD. (whose file number is 82-5233), enclose herewith the following information:

Press Release: Press release dated on March 19 and 26, 2002.

We hereby attach excerpted translation of this Press Release.

Thank you for your attention.

Yours truly,

Shinichiro Kitamura

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THOMSON
FINANCIAL

SK

cc. BELLUNA CO., LTD.
THE BANK OF NEW YORK

(Excerpt translation)

March 19, 2002

Dear Sirs:

Name of Company: BELLUNA CO., LTD.

Code No.: 9997 1st Section of the Tokyo Stock Exchange

Notice of Issuance of Unsecured Convertible Bonds

Notice is hereby given that at the meeting of the Board of Directors of the Company held on March 19, 2002, it was resolved that unsecured convertible bonds be issued, as described below:

Description

- | | |
|--------------------------------|--------------------------------------------------------------------------------|
| 1. Name of issue: | Belluna Co., Ltd. The 2nd Unsecured Convertible Bonds
With 120% Call Option |
| 2. Total amount of issue: | ¥5 billion |
| 3. Face Value of each Bond: | ¥1 million |
| 4. Form of the Bonds: | Bearer form |
| 5. Interest: | Not yet decided |
| 6. Issue price: | ¥100 per ¥100 in face value |
| 7. Redemption amount: | ¥100 per ¥100 in face value |
| 8. Redemption at maturity: | March 30, 2007 |
| 9. Offering period: | Not yet decided |
| 10. Payment date: | April 15, 2002 |
| 11. Methods of offering: | Public Offering |
| 12. Particulars of Conversion: | |
| (2) Conversion price: | Not yet decided |

- END -

(Excerpt translation)

March 26, 2002

Dear Sirs:

Name of Company: BELLUNA CO., LTD.

Code No.: 9997 1st Section of the Tokyo Stock Exchange

Notice of Issuance of Unsecured Convertible Bonds

Notice is hereby given that at the meeting of the Board of Directors of the Company held on March 26, 2002, it was resolved that undecided conditions of The 2nd Unsecured Convertible Bonds With 120% Call Option (which issuance was approved by the Board of Directors of the Company on March 19, 2002) were decided as follows:

Description

- | | |
|------------------------------------|--------------------------------------|
| 1. Conversion price: | ¥4,592 per share |
| 2. Credited amount to the capital: | ¥2,296 per share |
| 3. Interest: | 0.2% per annum |
| 4. Offering period: | March 27, 2002 through April 1, 2002 |

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