

January 12, 2011

PHILIPPINE STOCK EXCHANGE INC.

Disclosure Department 3rd Floor, Philippine Stock Exchange Plaza Ayala Triangle. Ayala Avenue Makati City

Attention: Ms. Janet Encarnacion

Head – Disclosure Department

Gentlemen:

In connection with the submission of the public ownership report, we hereby state that as of December 31, 2010, the public ownership of Solid Group Inc. is 22.93%.

Attached herewith is the computation of our company's public ownership level.

We trust that you will find everything to be in order.

Very truly yours,

MELLINA T. CORPUZ

Corporate Information Officer

SOLID GROUP INC. Computation of Public Ownership as of December 31, 2010

			Number of Shares			
		_	Α	В	Total	
nber of Issued Shares			2,030,975,000	0	2,030,975,000	
Less: Number of Treasury Shares (if any)			209,433,000	0	209,433,000	
Number of Issued and Outstanding Shares Less:		1,821,542,000	0	1,821,542,000		
	% to total I/O Shares		Α	В	Total	
Directors*	<u> </u>	_				
Elena S. Lim						
Direct	0.0001	%	1,894	0	1,894	
Susan L. Tan	2 22 42	0/	70.045	•	70.04	
Direct David S. Lim	0.0043	%	78,645	0	78,645	
David S. Lim Direct	9.8537	0/_	179,488,591	0	179,488,591	
Vicent S. Lim	9.0001	/0	179,400,591	U	179,400,39	
Direct	3.9465	%	71,887,187	0	71,887,187	
Jason S. Lim	0.0 100	,0	7 1,007,107	·	7 1,007,107	
Direct	3.5781	%	65,176,160	0	65,176,160	
Quintin Chua			, -,		, -,	
Direct	0.0003	%	5,000		5,000	
Indirect thru PCD Nominee Corp	0.1921	%	3,500,000	0	3,500,000	
Luis-Maria Zabaljauregui						
Direct	0.0003	%	5,000	0	5,000	
Beda T. Manalac						
Direct	0.0001	%	1,001	0	1,00	
Sub-total Sub-total	17.5754	%	320,143,478	0	320,143,478	
Officers*						
Lita Joaquin						
Direct	0.0005	%	10,000	0	10,000	
Roberto V. San Jose						
Direct	0.0133	%	242,000	0	242,000	
Ana Maria A, Katigbak						
Direct	-	%	0	0	(
Sub-total	0.0138	%	252,000	0	252,000	
Principal/Substantial Stockholders*						
AA Commercial Inc						
Direct	32.03	%	583,377,817	0	583,377,817	
AV Value Holding Corp						
Direct	27.45	%	499,999,999	0	499,999,999	
Sub-total	59.48	%	1,083,377,816	0	1,083,377,816	
Affiliate*	•	0/	^	•		
Sub-total		% %	0 0	0 0	(
Others*						
Government*	Ω	%	0	0	(
Banks*	0	%	0	0	(
Employees*	0	%	0	0	(
Lock-Up Shares*		%	0	0	(
Sub-total	0	%	0	0	(
TOTAL	77.07	%	1,403,773,294.00	-	1,403,773,294.00	

SOLID GROUP INC. PUBLIC OWNERSHIP PERCENTAGE <u>Total Number of Shares Owned by the Public</u> Total Issued and Outstanding Shares 417,768,706 shares 22.93% 1,821,542,000 shares Required Public Ownership% 10% Complied Not Complied 1,821,542,000 Number of Issued and Outstanding Shares = Number of Outstanding Shares Number of Treasury Shares 1,821,542,000 209,433,000 Number of Listed Shares 2,030,975,000 Number of Foreign-Owned Shares 18,676,099 Foreign Ownership Level (%) 1.03% Foreign Ownership Limit (%) 40%