

October 13, 2010

## PHILIPPINE STOCK EXCHANGE INC.

Disclosure Department 4<sup>th</sup> Floor, Philippine Stock Exchange Center Exchange Road, Ortigas Center Pasig 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 September 30, 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,

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MELLINA T. CORPUZ Corporate Information Officer

Less:         Number of Treasury Shares (If any)         209,433,000         0         209,433,000           Number of Issued and Outstanding Shares         % to total         1,821,542,000         0         1,821,542,000           Less:         % to total         %         Total         B           Directs*         0.0001         %         1,894         0         1,89           Direct         0.0003         %         79,488,591         0         179,488,591           Otiest         0.0003         %         5,176,160         0         65,176,160         0         65,176,160         0         5,000         0         5,000         0         5,000         0         5,000         0         5,000         0         5,000         0         5,000         0         5,000         0         5,000         0         1,001         0         1,001         0         1,001         0         1,000         0         1,000		OLID GROUP IN				
A         B         Total           Lumber of Issued Shares         2.030.975.00         0         2.039.875.00         0         2.039.875.00         0         3.049.5         1.021.542.00         0         3.049.5         1.001         0         1.80         3.040.5         1.001         0         1.001         0         1.001         0         1.001         0         1.001         0         0.000         2.00         0         2.00         0         2.00         0         2.00         0         2.00         0         2.00         0         2.00	Computation of Publ	ic Ownership as	of S	eptember 30, 2010		
Less:         Number of Treasury Shares (if any)         209,433,000         0         209,433,000         0         209,433,000           Number of Issued and Outstanding Shares         ''' to total         '''<''''''''''''''''''''''''''''''''			_			
Less:         % to total IVO Shares         A         B         Total           Directors* Elena S, Lim Direct         0.0001 %         1,894         0         1,89           Susan L. Tan Direct         0.0043 %         78,645         0         78,645           Direct         0.043 %         78,645         0         71,887,187           Direct         3.9465 %         71,887,187         0         71,887,187           Direct         3.9465 %         71,887,187         0         5,000           Direct         3.9465 %         71,887,187         0         5,000           Direct         3.9465 %         71,887,187         0         5,000           Direct         0.0003 %         5,000         0         3,500,000           Direct         0.0003 %         5,000         0         3,500,000           Direct         0.0000         2         0         2,000           Bedo T. Manalac         0.0000         2         0         3,201,43,480         0         320,143,480           Direct         0.0001         1.001         0         1,000         0         1,000           Direct         0.0005 %         10,000         0         0,000						2,030,975,000 209,433,000
½ to total VO Shares         A         B         Total           Birectors* Elema S. Lim Direct         0.0001 %         1.894         0         1.89           Susan L. Tan Direct         0.0043 %         78,645         0         78,645           Direct         0.0043 %         78,645         0         78,645           Direct         0.0043 %         78,645         0         71,887,187           Direct         0.0043 %         71,887,187         0         71,887,187           Direct         0.0033 %         5,000         0         65,000           Direct         0.0033 %         5,000         0         5,000           Direct         0.0003 %         5,000         0         5,000           Direct         0.0003 %         5,000         0         5,000           Direct         0.0001         1,001         0         1,000           Direct         0.0001         1,001         0         1,000           Direct         0.0001         1,001         0         1,000           Direct         0.0005 %         10,000         0         10,000           Direct         0.0133 %         242,000         0         242,000				1,821,542,00	0 0	1,821,542,000
Directors*	Less:			Δ	в	Total
Direct         0.0001 %         1.884         0         1.88           Direct         0.0043 %         78,645         0         78,64           David S. Lim         9.8537 %         179,488,591         0         178,488,59           Direct         3.9465 %         71,887,187         0         71,887,187           Direct         3.5781 %         65,176,160         0         65,176,160           Direct         3.5781 %         50,000         5,000         5,000           Direct         0.0003 %         5,000         0         3,500,000           Luis Maini Zabaljauregui         0.0003 %         5,000         0         5,000           Direct         0.0000         %         3,500,000         0         1,000           Joseph Lim         0.0000         %         3,500,000         0         1,000           Direct         0.0000         %         3,500,000         0         1,000           Direct         0.0000         %         1,000         0         1,000           Bobert Manalac         0.0000         %         10,000         0         10,000           Direct         0.0000         %         0         0         2	Directors*		· —			Total
Susan L. Tan         Direct         0.0043 %         78,645         0         78,645           David S. Lim         0.8537 %         179,488,591         0         178,48,591           Direct         3.9465 %         71,887,187         0         71,887,18           Jason S. Lim         3.5761 %         65,176,160         0         65,176,160           Direct         0.0003 %         5,000         0         3,500,00           Direct         0.0003 %         5,000         0         3,500,00           Direct         0.0000         2         0         20           Direct         0.0000         2         0         1,00           Direct         0.0001         1,001         0         1,000           Direct         0.0005 %         10,000         0         242,00           Direct         0.0013 %         242,000         0         242,00           Direct         0.005 %         10,000         0         242,00           Direct         0.0013 %         252,000         0         252,000           Sub-total         0.005 %         10,000         0         0         0           Direct         0.0138 %         252,000						
Direct         0.0043         %         78,645         0         78,64           Direct         9,8537         %         179,488,591         0         179,488,591           Direct         3,9465         %         71,867,187         0         71,867,187           Direct         3,5781         %         65,176,160         0         65,176,160           Direct         0,0003         %         5,000         0         3,500,00           Direct         0,0003         %         5,000         0         3,500,00           Direct         0,0003         %         5,000         0         5,000           Direct         0,0003         %         5,000         0         5,000           Direct         0,0003         %         5,000         0         5,000           Direct         0,0001         1,001         0         1,000         0         1,000           Sub-total         17,5754         %         320,143,480         0         220,00         242,000           Direct         0,0005         %         10,000         0         10,000         242,000         242,000         252,000           Direct         0,0133		0.0001	%	1,89	4 0	1,894
Direct         9.8537         %         179.488,591         0         179,488,591           Vicent S. Lim         3.9465         %         71,887,187         0         71,887,18           Direct         3.5781         %         65,176,160         0         65,176,16           Outinin Chua         0.0003         %         5,000         0         3,500,000           Direct         0.0003         %         5,000         0         3,500,000           Usite Maria Zabaljauregui         0.0003         %         5,000         0         5,000           Direct         0.0003         %         5,000         0         5,000           Direct         0.0001         1,001         0         1,00           Direct         0.0001         1,001         0         1,00           Direct         0.0005         %         10,000         0         10,00           Direct         0.0005         %         10,000         0         242,00           Direct         0.0133         %         242,000         0         242,000           Ans Maria A, Katigbak         0         0         0         252,000         0         258,377,817 <tr< td=""><td>Direct</td><td>0.0043</td><td>%</td><td>78,64</td><td>5 0</td><td>78,645</td></tr<>	Direct	0.0043	%	78,64	5 0	78,645
Direct         3.8465 %         71,887,187         0         71,887,187           Jason S. Lim         3.5781 %         65,176,160         0         65,176,16           Quintin Chua         0.0003 %         5,000         0         3,500,000           Direct         0.0003 %         5,000         0         3,500,000           Luis-Maria Zabaljauregui         0.0003 %         5,000         0         5,000           Direct         0.0000 %         5,000         0         5,000           Direct         0.0000 %         5,000         0         5,000           Direct         0.0000 %         5,000         0         5,000           Direct         0.0001 %         1,001         0         1,00           Direct         0.0001 %         10,000         0         10,000           Sub-total         0.0005 %         10,000         0         242,000           Direct         0.0133 %         242,000         0         252,000           Direct         0.0138 %         252,000         0         252,000           Direct         27,45 %         499,999,999         0         499,999,999           Sub-total         59,48 %         1,083,377,81	Direct	9.8537	%	179,488,59	1 0	179,488,591
Direct         3.5781         %         65,176,160         0         65,176,160           Quintin Chua         0.0003         %         5,000         0         3,500,000           Direct         0.0003         %         5,000         0         3,500,000           Direct         0.0003         %         5,000         0         5,000           Direct         0.0000         2         0         0         5,000           Beda T. Manalac         0.0001         1,001         0         1,000           Direct         0.0001         1,001         0         1,000           Sub-total         17.5754         %         320,143,480         0         320,143,480           Officers*         Lita Joaquin         0.0005         %         10.000         0         10.000           Borect         0.0133         %         242,000         0         242,000           Ana Maria A, Katigbak         0.0133         %         252,000         0         252,000           Direct         0.0133         %         252,000         0         252,000         262,000           Value Holding Corp         27.45         499,999,999         0         499,999,99	Direct	3.9465	%	71,887,18	7 0	71,887,187
Direct         0.0003         %         5.000         5.00           Indirect thur PCD Nominee Corp         0.1921         %         3.500,000         0         3.500,000           Luis-Maria Zabaljauregui         Direct         0.0000         %         5.000         0         5.00           Joseph Lim         Direct         0.0000         2         0         0         1.00           Bredt         Manalac         0.0001         1,001         0         1.00           Direct         0.0001         1,001         0         1.00           Sub-total         17.5754         %         320,143,480         0         320,143,480           Officers*         Lta Joaquin         Direct         0.0005         %         10.000         0         10.00           Roberto V. San Jose         Direct         0.0133         %         242,000         0         242,00           Arcommercial Inc         Direct         27.45         %         499,999,999         0         499,999,999           Direct         27.45         %         1,083,377,817         0         583,377,817         0         499,999,999           Direct         0 %         0         0		3.5781	%	65,176,16	0 0	65,176,160
Indirect thru PCD Nominee Corp Direct         0.1921         %         3,500,000         0         3,500,000           Luis-Maria Zabaijauregui Direct         0.0000         %         5,000         0         5,00           Joseph Lim Direct         0.0000         2         0         0         1,001         0         1,001           Beda T. Manalac Direct         0.0001         1,001         0         320,143,480         0         320,143,480           Officers*         11         0.0005         %         10,000         0         10,00           Sub-total         0.0005         %         10,000         0         10,00           Roberto V. San Jose         0.0133         %         242,000         0         242,000           Direct         0.0138         %         252,000         0         252,000           Sub-total         0.0138         %         252,000         0         252,000           Principal/Substantial Stockholders*         32,03 %         568,377,817         0         568,377,817           AV value Holding Corp         27,45 %         499,999,999         0         499,999,999         0         499,999,999           Sub-total         0 %         0					_	
Direct         0.0003         %         5,000         0         5,000           Direct         0.0000         2         0         0         1,000         1,000         1,000         1,000         1,000         320,143,480         0         320,143,480         0         320,143,480         0         320,143,480         0         320,143,480         0         320,143,480         0         320,143,480         0         320,143,480         0         320,143,480         0         10,000	Indirect thru PCD Nominee Corp					5,000 3,500,000
Direct         0.0000         2         0           Beda T, Manalac         Direct         0.0001         1,001         0         1,00           Sub-total         17.5754         %         320,143,480         0         320,143,480           Officers*         Lita Joaquin         Direct         0.0005         %         10,000         0         10,000           Roberto V, San Jose         0.0005         %         10,000         0         242,000         0         242,000           Direct         0.0133         %         242,000         0         242,000           And Maria A, Katigbak         Direct         0.0138         %         252,000         0         252,000           Principal/Substantial Stockholders*         A         Commercial Inc         27.45         499,999,999         0         499,999,999         0         499,999,999         0         499,999,999         0         499,999,999         0         499,999,999         0         499,999,999         0         499,999,999         0         499,999,999         0         499,999,999         0         499,999,999         0         499,999,999         0         499,999,999         0         499,999,999         0         499,999,999	Direct	0.0003	%	5,00	0 0	5,000
Direct         0.0001         1,001         0         1,001           Sub-total         17.5754         %         320,143,480         0         320,143,480           Officers*         Lita Joaquin         0.0005         %         10,000         0         10,000           Direct         0.0005         %         10,000         0         10,000         0         10,000           Roberto V. San Jose         0.0133         %         242,000         0         242,000           Direct         0.0138         %         252,000         0         252,000           Sub-total         0.0138         %         252,000         0         252,000           Sub-total         0.0138         %         252,000         0         252,000           Direct         32.03         %         583,377,817         0         583,377,817           AV Value Holding Corp         27.45         %         499,999,999         0         499,999,999         0         499,999,999         0         499,999,999         0         499,999,999         0         499,999,999         0         499,999,999         0         499,999,999         0         499,999,999         0         499,999,999 <th< td=""><td>•</td><td>0.0000</td><td></td><td></td><td>2 0</td><td>2</td></th<>	•	0.0000			2 0	2
Officers*         Ital Joaquin         Direct         0.0005         %         10,000         0         10,000           Roberto V. San Jose         0.1133         %         242,000         0         242,000           Direct         0.0133         %         242,000         0         242,000           Ana Maria A, Katigbak         -         %         0         0         0           Direct         -         %         0         0         242,000         0         242,0		0.0001		1,00	1 0	1,001
Officers* $11a$ Joaquin $10rect$ $0.005$ $\%$ $10,00$ $0$ $10,00$ Roberto V. San Jose $0.0133$ $\%$ $242,000$ $0$ $242,00$ Direct $0.0133$ $\%$ $242,000$ $0$ $242,00$ Ana Maria A, Katigbak $ \%$ $0$ $0$ $0$ Direct $ \%$ $0$ $0$ $0$ $0$ Sub-total $0.0138$ $\%$ $252,000$ $0$ $0$ $0$ A Commercial Inc $Direct$ $32.03$ $\%$ $583,377,817$ $0$ $583,377,817$ $0$ $499,999,999$ $0$ $499,999,999$ $0$ $499,999,999$ $0$ $499,999,999$ $0$ $499,999,999$ $0$ $1083,377,816$ $0$	Sub-total	17.5754	%	320,143,48	0 0	320,143,480
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       242,000         Ana Maria A, Katigbak Direct       -       %       0       0       242,000         Sub-total       0.0138       %       252,000       0       252,000       252,000         Principal/Substantial Stockholders* A 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       %       499,999,999         Sub-total       9       %       0       0       %       0       0         Government*       0       %       0       0       0       %       0       0       %       1,083,377,816       %       1,083,377,816       %       1,083,377,816       %       1,083,377,816       %       1,083,377,816       %       %       1,083,377,816       %       %						
Direct         0.0005 %         10,000         0         10,000           Roberto V. San Jose         0.0133 %         242,000         0         242,000           Ana Maria A, Katigbak         -         %         0         0         242,000         0						
Direct         0.0133 %         242,000         0         242,000           Ana Maria A, Katigbak Direct         - %         0         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         0 %         0         0         0           Sub-total         0 %         0         0         0           Banks*         0 %         0         0         0           Lock-Up Shares*         0 %         0         0         0           Sub-total         0 %         0         0         0	Direct	0.0005	%	10,00	0 0	10,000
Direct         - %         0         0           Sub-total         0.0138 %         252,000         0         252,000           Principal/Substantial Stockholders*         32.03 %         583,377,817         0         583,377,817           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           Sub-total         0 %         0         0         0           Banks*         0 %         0         0         0           Banks*         0 %         0 <t< td=""><td>Direct</td><td>0.0133</td><td>%</td><td>242,00</td><td>0 0</td><td>242,000</td></t<>	Direct	0.0133	%	242,00	0 0	242,000
Principal/Substantial Stockholders*       32.03 %       583,377,817       0       583,377,817         AA Commercial Inc       32.03 %       583,377,817       0       583,377,817         AV Value Holding Corp       27.45 %       499,999,999       0       499,999,999         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 %       0       0       0         Sub-total       0 %       0       0       0         Others*       0 %       0       0       0       0         Banks*       0 %       0	-	-	%		0 0	0
AA Commercial Inc       32.03 %       583,377,817       0       583,377,817         AV Value Holding Corp       27.45 %       499,999,999       0       499,999,999         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 %       0       0       0         Sub-total       0 %       0       0       0         Others*       0 %       0       0       0         Government*       0 %       0       0       0         Employees*       0 %       0       0       0         Lock-Up Shares*       0 %       0       0       0	Sub-total	0.0138	%	252,00	0 0	252,000
Direct AV Value Holding Corp Direct         32.03 %         583,377,817         0         583,377,817           AV Value Holding Corp Direct         27.45 %         499,999,999         0         499,999,999         499,999,999         499,999,999         1,083,377,816         0         1,083,377,816         0         1,083,377,816         0         1,083,377,816         0         1,083,377,816         0         1,083,377,816         0	Principal/Substantial Stockholders*					
Direct         27.45 %         499,999,999         0         499,999,999         0         499,999,999         0         499,999,999         0         499,999,999         0         499,999,999         0         499,999,999         0         499,999,999         0         499,999,999         0         499,999,999         0         499,999,999         0         499,999,999         0         499,999,999         0         499,999,999         0         499,999,999         0         499,999,999         0         499,999,999         0         1083,377,816         0         1,083,377,816         0		32.03	%	583,377,817	7 0	583,377,817
Affiliate*       0 %       0 0       0         Sub-total       0 %       0       0         Others*       0 %       0       0         Government*       0 %       0       0         Banks*       0 %       0       0         Employees*       0 %       0       0         Lock-Up Shares*       0 %       0       0         Sub-total       0 %       0       0		27.45	%	499,999,999	9 0	499,999,999
Affiliate*       0 %       0 0       0         Sub-total       0 %       0       0       0         Others*       0 %       0       0       0         Government*       0 %       0       0       0         Banks*       0 %       0       0       0         Employees*       0 %       0       0       0         Lock-Up Shares*       0 %       0       0       0	Sub-total	59.48	%	1,083,377,81	6 0	1,083,377,816
Sub-total         0 %         0 0         <	Affiliate*					
Others*         0 %         0         0           Government*         0 %         0         0         0           Banks*         0 %         0	Sub-total					0 <b>0</b>
Government*         0 %         0         0           Banks*         0 %         0         0           Employees*         0 %         0         0           Lock-Up Shares*         0 %         0         0           Sub-total         0 %         0         0		-			-	
Employees*       0 %       0       0         Lock-Up Shares*       0 %       0       0         Sub-total       0 %       0       0		0	%		0 0	0
Lock-Up Shares*         0 %         0         0           Sub-total         0 %         0         0	Banks*	0	%		0 0	0
Sub-total         0 %         0         0	Employees*	0	%		0 0	0
						0 <b>0</b>
TOTAL 77.07 % 1,403,773,296.00 - 1,403,773,296.00	TOTAL			1,403,773,296.00		1,403,773,296.00
		11.01	/0	1,403,113,290.0U	, -	417,768,704

PUBLIC OWNERSHIP PERCENTAGE Total Number of Shares Owned by the Public						
417.768.704 shares 1,821,542,000 shares	=	<u>22.93%</u>				
Number of Issued and Outstanding Shares	=	1,821,542,000				
Number of Outstanding Shares	=	1,821,542,000				
Number of Treasury Shares	=	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%				