

COVER SHEET

A S 0 9 3 8 1 2 7
S.E.C. Registration Number

A P C G R O U P I N C .
(Company's Full Name)

1 0 t h F l o o r P h i l c o m B u i l d i n g P a s e o d e

R o x a s , M a k a t i C i t y

(Business Address: No. Street City/Town/Province)

ATTY. EDMUNDO L. TAN
Contact Person

6353671 TO 78
Company Telephone Number

1 2 3 1
Fiscal Year

REPLY TO SEC LETTER
F O R M T Y P E

2nd Thursday JUNE
Annual Meeting

Secondary License Type, If Applicable

Corporation Finance Department
Dep. Requiring this Doc.

Amended Articles Number/Section

Total No. of Stockholders

Total Amount of Borrowings
Domestic Foreign

To be accomplished by SEC Personnel concerned

LCU

Cashier

STAMPS

Remarks: pls. use black ink for scanning purposes.



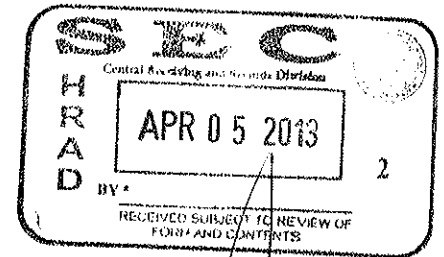
APC GROUP INC.

02 April 2013

SECURITIES AND EXCHANGE COMMISSION
SEC Building, EDSA, Greenhills
Mandaluyong City

Attention: **Atty. Justina F. Callangan**
Director
Corporate Finance Department

Re: **APC Group, Inc.**
Reply to SEC letter dated 13 March 2013



Gentlemen:

This refers to your letter dated March 13 which was received by our company on 27 March 2013 informing us of some deficiencies in the company's General Information Sheet (GIS) filed on 28 June 2012. On 1 April 2013, we requested a five (5) days extension of time to file our reply as well as (5) days or until 7 April 2013 within which to file an amended GIS to correct said the deficiencies.

In your letter, you informed us that the following were not indicated in the company's 2012 GIS:

1. Independent Directors
2. Top 20 Stockholders
3. Type of License/Registration
4. Date of Issuance of the Secondary License
5. Date started operations
6. Total Annual compensation of Directors During the Preceding Fiscal Year

You also mentioned that the number of Directors/Officers is not consistent with the Articles of Incorporation.

We give our reply as follows:

1. *Independent Directors*: In the original GIS filed on 28 June 2012, you will observe that we had marked with asterisk and supplied a corresponding footnote for the independent directors on page 3. We should have indicated "I" for independent directors instead. Please see our correction in the Amended GIS attached hereto.
2. *Top 20 Stockholders*: In our original GIS filed on 28 June 2012, you will observe that a one page list of the company's Top Twenty Stockholders was made as a separate attachment to the GIS. We will again attach a copy of the said List in the Amended GIS attached hereto for your ready reference.
3. *Type of License/Registration*: APC Group, Inc. is a holding company. Accordingly, it has no secondary license. We believe the false impression is created by the term 'financial intermediary' indicated in the industry classification. We will rectify this in the attached amended GIS by indicating 'holding company' in the industry classification box and by attaching a separate sheet containing the primary purpose of the Company.
4. *Date of Issuance of the Secondary License*: As stated in number 3 above, the company has no secondary license.
5. *Date started operations*: The Company reckons this from the same date as that of the registration stated in the original GIS which is 15 October 1993.
6. *Total annual compensation of Directors During the Preceding Fiscal Year*: We have indicated a total compensation of P1,980,000 on the amended GIS attached to this letter.

On the alleged issue of inconsistency of the number of directors/officers with the Articles of Incorporation, we maintain that as of the date of the filing of the original GIS, the Articles of Incorporation (as last amended on 13 October 2011) provided for eleven (11) directors. It was only on 14 December 2012 that the amendment to Articles VI of the Articles of Incorporation was approved by the SEC effectively reducing the number of director to seven (7).

For your ready reference, we attach a copy of both the original 2012 GIS filed on 28 June 2012 and the Amended 2012 GIS containing the desired corrections.

We trust that the foregoing is sufficient for your purposes. If you have further questions, kindly let us know.

Very truly yours,



EDMUNDO L. TAN
Corporate Secretary

COVER SHEET

A S 0 9 3 8 1 2 7
S.E.C. Registration Number

A P C G R O U P I N C .
(Company's Full Name)

1 0 T H F L O O R P H I L C O M B U I L D I N G , 8 7 5 5

P A S E O D E R O X A S , M A K A T I C I T Y
(Business Address: No. Street City/Town/Province)

ATTY. EDMUNDO L. TAN
Contact Person

635-36-71 TO 78
Company Telephone Number

1 2 3 1
Month Day
Fiscal Year

AMENDED GIS
FORM TYPE

2nd Thursday June
Month Day
Annual Meeting

Secondary License Type, If Applicable

Corporation Finance Department
Dep. Requiring this Doc.

Amended Articles Number/Section

Total No. of Stockholders

Total Amount of Borrowings
Domestic Foreign

To be accomplished by SEC Personnel concerned

LCU

Cashier

STAMPS

Remarks: pls. use black ink for scanning purposes.

SECOND AMENDED GENERAL INFORMATION SHEET (GIS)

FOR THE YEAR 2012
STOCK CORPORATION

GENERAL INSTRUCTIONS:

1. FOR USER CORPORATION: THIS GIS SHOULD BE SUBMITTED WITHIN THIRTY (30) CALENDAR DAYS FROM THE DATE OF THE ANNUAL STOCKHOLDERS' MEETING. **DO NOT LEAVE ANY ITEM BLANK.** WRITE "N.A." IF THE INFORMATION REQUIRED IS NOT APPLICABLE TO THE CORPORATION OR "NONE" IF THE INFORMATION IS NON-EXISTENT.
2. IF NO MEETING IS HELD, THE CORPORATION SHALL SUBMIT THE GIS TOGETHER WITH AN AFFIDAVIT OF NON-HOLDING OF MEETING WITHIN THIRTY (30) CALENDAR DAYS FROM THE DATE OF THE SCHEDULED ANNUAL MEETING (AS PROVIDED IN THE BY-LAWS), HOWEVER, SHOULD AN ANNUAL STOCKHOLDERS' MEETING BE HELD THEREAFTER, A NEW GIS SHALL BE SUBMITTED/FILED.
3. THIS GIS SHALL BE ACCOMPLISHED IN ENGLISH AND CERTIFIED AND SWORN TO BY THE CORPORATE SECRETARY OF THE CORPORATION.
4. THE SEC SHOULD BE TIMELY APPRISED OF RELEVANT CHANGES IN THE SUBMITTED INFORMATION AS THEY ARISE. FOR CHANGES RESULTING FROM ACTIONS THAT AROSE BETWEEN THE ANNUAL MEETINGS, THE CORPORATION SHALL SUBMIT ONLY THE AFFECTED PAGE OF THE GIS THAT RELATES TO THE NEW INFORMATION TOGETHER WITH A COVER LETTER SIGNED BY THE CORPORATE SECRETARY OF THE CORPORATION. THE PAGE OF THE GIS AND COVER LETTER SHALL BE SUBMITTED WITHIN SEVEN (7) DAYS AFTER SUCH CHANGE OCCURRED OR BECAME EFFECTIVE.
5. SUBMIT TWO (2) COPIES OF THE GIS TO THE CENTRAL RECEIVING SECTION, GROUND FLOOR, SEC BLDG., EDSA, MANDALUYONG CITY. ALL COPIES SHALL UNIFORMLY BE ON A4 OR LETTER-SIZED PAPER WITH A STANDARD COVER PAGE. THE PAGES OF ALL COPIES SHALL USE ONLY ONE SIDE. CORPORATIONS SUBMITTING A COPY OF THEIR GIS ONLINE OR VIA INTERNET SHALL SUBMIT ONE (1) HARD COPY OF THE GIS, TOGETHER WITH A CERTIFICATION UNDER OATH BY ITS CORPORATE SECRETARY THAT THE COPY SUBMITTED ONLINE CONTAINS THE EXACT DATA IN THE HARD COPY.
6. **ONLY THE GIS ACCOMPLISHED IN ACCORDANCE WITH THESE INSTRUCTIONS SHALL BE CONSIDERED AS HAVING BEEN FILED.**
7. THIS GIS MAY BE USED AS EVIDENCE AGAINST THE CORPORATION AND ITS RESPONSIBLE DIRECTORS/OFFICERS FOR ANY VIOLATION OF EXISTING LAWS, RULES AND REGULATIONS

***** PLEASE PRINT LEGIBLY *****

CORPORATE NAME: APC GROUP, INC.		DATE REGISTERED: 10/15/1993
BUSINESS/TRADE NAME:		FISCAL YEAR END: December 31
SEC REGISTRATION NUMBER: AS-093-8127		CORPORATE TAX IDENTIFICATION NUMBER (TIN) 002-834-075
DATE OF ANNUAL MEETING PER BY-LAWS: SECOND THURSDAY OF JUNE		WEBSITE/URL ADDRESS:
ACTUAL DATE OF ANNUAL MEETING: 6-Jun-12		E-MAIL ADDRESS:
COMPLETE PRINCIPAL OFFICE ADDRESS: 10th Floor, Philcom Building, 8755 Paseo de Roxas, Makati City		FAX NUMBER: 854-02-59
COMPLETE BUSINESS ADDRESS: 10th Floor, Philcom Building, 8755 Paseo de Roxas, Makati City		TELEPHONE NUMBER(S): 8450614
NAME OF EXTERNAL AUDITOR & ITS SIGNING PARTNER: SYCIP, GORRES, VELAYO & CO.		SEC ACCREDITATION NUMBER (if applicable):
PRIMARY PURPOSE/ACTIVITY/INDUSTRY PRESENTLY ENGAGED IN: Please see attached Primary Purpose	INDUSTRY CLASSIFICATION: Holding Company	GEOGRAPHICAL CODE:

***** INTERCOMPANY AFFILIATIONS *****

PARENT COMPANY	SEC REGISTRATION NO.	ADDRESS
SUBSIDIARY/AFFILIATE	SEC REGISTRATION NO.	ADDRESS
APC MINING CORPORATION	CS200504401	8th Floor, PhilCom Bldg., 8755 Paseo de Roxas Makati
ARAGORN POWER & ENERGY CORPORATION	CS200500064	"
ARAGORN COAL RESOURCES CORP.	CS200501421	"
APC CEMENT CORPORATION	AS094-0010352	"
PRC-MAGMA ENERGY RESOURCES, INC.	CS200907983	"

NOTE: USE ADDITIONAL SHEET IF NECESSARY

GENERAL INFORMATION SHEET

STOCK CORPORATION

===== PLEASE PRINT LEGIBLY =====

CORPORATE NAME: APC GROUP, INC.

CAPITAL STRUCTURE

AUTHORIZED CAPITAL STOCK

	TYPE OF SHARES *	NUMBER OF SHARES	PAR/STATED VALUE	AMOUNT (Php) (No. of shares X Par/Stated Value)
	COMMON	14,000,000,000	1.00	14,000,000,000.00
	PREFERRED	6,000,000,000	1.00	6,000,000,000.00
TOTAL		20,000,000,000	TOTAL P	20,000,000,000.00

SUBSCRIBED CAPITAL

FILIPINO	NO. OF STOCK-HOLDERS	TYPE OF SHARES *	NUMBER OF SHARES	NUMBER OF SHARES IN THE HANDS OF THE PUBLIC **	PAR/STATED VALUE	AMOUNT (Php)	% OF OWNERSHIP
	621	COMMON	7,360,608,534		1.00	7,360,608,534.00	98%
TOTAL			7,360,608,534	TOTAL	TOTAL P	7,360,608,534.00	98%

FOREIGN (INDICATE BY NATIONALITY)	NO. OF STOCK-HOLDERS	TYPE OF SHARES *	NUMBER OF SHARES	NUMBER OF SHARES IN THE HANDS OF THE PUBLIC **	PAR/STATED VALUE	AMOUNT (Php)	% OF OWNERSHIP
	5	COMMON	151,201,463		1.00	151,201,463.00	2%

Percentage of Foreign Equity :		TOTAL	151,201,463	TOTAL	TOTAL P	151,201,463.00	2%
TOTAL SUBSCRIBED P						7,511,809,997.00	

PAID-UP CAPITAL

FILIPINO	NO. OF STOCK-HOLDERS	TYPE OF SHARES *	NUMBER OF SHARES	PAR/STATED VALUE	AMOUNT (Php)	% OF OWNERSHIP
	621	COMMON	3,820,657,946	1.00	3,820,657,946.00	75%
TOTAL			3,820,657,946	TOTAL P	3,820,657,946.00	75%

FOREIGN (INDICATE BY NATIONALITY)	NO. OF STOCK-HOLDERS	TYPE OF SHARES *	NUMBER OF SHARES	PAR/STATED VALUE	AMOUNT (Php)	% OF OWNERSHIP
	5	COMMON	151,201,463	1.00	151,201,463.00	98%
TOTAL			151,201,463	TOTAL P	151,201,463.00	2%

TOTAL PAID-UP P					3,971,859,409.00
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NOTE: USE ADDITIONAL SHEET IF NECESSARY

*

** Other than Directors, Officers, Shareholders owning 10% of outstanding shares.

GENERAL INFORMATION SHEET

STOCK CORPORATION

===== PLEASE PRINT LEGIBLY =====

CORPORATE NAME: APC GROUP, INC.

DIRECTORS / OFFICERS

NAME, NATIONALITY AND CURRENT RESIDENTIAL ADDRESS	INC'R	BOARD	STOCK HOLDER	OFFICER	EXEC. COMM.	TAX IDENTIFICATION NO. (TIN) FOR FILIPINOS or PASSPORT NO. FOR FOREIGNERS
1. WILLY N. OCIER #32 Wilson St., Greenhills, San Juan Metro Manila	N	C	Y		C	101-934-954 Filipino
2. JERRY C. TIU * No. 5, Urdaneta St., Urdaneta Village, Makati City	N	I	Y	N/A		106-218-979 Filipino
3. MANUEL A. GANA No. 8, San Antonio St., Magallanes Village Makati City	N	M	Y	N/A		906-105-404 Filipino
4. FREDERIC C. DYBUNCIO 39B, Manila Tower Residencia, Greenbelt Esperanza, Makati City	N	M	Y	President & CEO		103-192-854 Filipino
5. BERNARDO D. LIM 83 Kyoto Street, B.F. Homes Parañaque City	N	M	Y	EVP/CFO		112-436-550 Filipino
6. EDMUNDO L. TAN 25 Padre Burgos Street, Ayala Heights Quezon City	N	M	Y	Corp. Secretary		132-173-235 Filipino
7. TOMAS D. SANTOS * No. 8, Harding Street, West Greenhills San Juan City	N	I	Y	N/A		100-061-178 Filipino
8. RICHARD ANTHONY D. ALCAZAR 3 Kaimito Avenue, Town & Country Exe. Village, Antipolo, Rizal	N	N	N	Asst. Corp. Secretary		178-486-310 Filipino
9. VIRGINIA A. YAP No. 7, Felipe Street, Makati City	N	M	Y	N/A		109-337-969 Filipino
10. ELIZABETH ANNE C. UYCHACO No. 10, M. Amorsolo West, Rockwell Cond., Makati City	N	M	Y	N/A		103-106-375 Filipino
11. ROGELIO R. CABUÑAG No. 17, St. Martin Street, Valle Verde III, Pasig City	N	M	Y	N/A		103-432-824
12. ARTHUR A. SY No. 23 Sto. Tomas Street, Urdaneta Village, Makati City	N	M	Y	N/A		174-674-196 Filipino
13.						

*Independent Director

INSTRUCTIONS:

FOR BOARD COLUMN, PUT "C" FOR CHAIRMAN, "M" FOR MEMBER, "I" FOR INDEPENDENT DIRECTOR.
 FOR INC'R COLUMN, PUT "Y" IF AN INCORPORATOR, "N" IF NOT.
 FOR STOCKHOLDER COLUMN, PUT "Y" IF A STOCKHOLDER, "N" IF NOT.
 FOR OFFICER COLUMN, INDICATE PARTICULAR POSITION IF AN OFFICER, FROM VP UP INCLUDING THE POSITION OF THE TREASURER, SECRETARY, COMPLIANCE OFFICER AND/OR ASSOCIATED PERSON.
 FOR EXECUTIVE COMMITTEE, INDICATE "C" IF MEMBER OF THE COMPENSATION COMMITTEE; "A" FOR AUDIT COMMITTEE; "N" FOR NOMINATION AND ELECTION COMMITTEE. ADDITIONALLY WRITE "C" AFTER SLASH IF CHAIRMAN AND "M" IF MEMBER.

*Independent Director

GENERAL INFORMATION SHEET
STOCK CORPORATION

===== PLEASE PRINT LEGIBLY =====

CORPORATE NAME: APC GROUP, INC.

TOTAL NUMBER OF STOCKHOLDERS:

NO. OF STOCKHOLDERS WITH 100 OR MORE SHARES EACH: 100

TOTAL ASSETS BASED ON LATEST AUDITED FINANCIAL STATEMENTS:

STOCKHOLDER'S INFORMATION

NAME, NATIONALITY AND CURRENT RESIDENTIAL ADDRESS	SHARES SUBSCRIBED				AMOUNT PAID (PhP)	TAX IDENTIFICATION NO. (TIN) FOR FILIPINOS or PASSPORT NO. FOR FOREIGNERS
	TYPE	NUMBER	AMOUNT (PhP)	% OF OWNER- SHIP		
1. WILLY N. OCIER Filipino #32 Wilson St., San Juan, Greenhills, M.M.	C	570,001	570,001.00		570,001.00	101-934-954
	TOTAL	570,001	570,001.00			
2. JERRY C. TIU * Filipino No. 5 , Urdaneta St., Urdaneta Village Makati City	C	1	1.00		1.00	106-218-979
	TOTAL	1	1.00			
3. MANUEL A. GANA Filipino No. 22, Jacinto St., Little Baguio, San Juan M.M.	C	1	1.00		1.00	904-105-404
	TOTAL	1	1.00			
4. FREDERIC C. DYBUNCIO Filipino 39B, Manila Tower Residencia , Greenbelt Makati City	C	1	1.00		1.00	103-192-854
	TOTAL	1	1.00			
5. BERNARDO D. LIM Filipino 83 Kyoto Street, B.F. Homes Paranaque City		1,000	1,000.00		1,000.00	112-436-550
	TOTAL	1,000	1,000.00			
6. EDMUNDO L. TAN Filipino 25 Padre Burgos St., Ayala Heights Village Quezon City	C	1	1.00		1.00	132-173-235
	TOTAL	1	1.00			
7. TOMAS D. SANTOS * Filipino No. 8 Harding Street, West Greenhills San Juan City	C	1	1.00		1.00	100-061-178
	TOTAL	1	1.00			
TOTAL AMOUNT OF SUBSCRIBED CAPITAL						
TOTAL AMOUNT OF PAID-UP CAPITAL						

INSTRUCTION: SPECIFY THE TOP 20 STOCKHOLDERS AND INDICATE THE REST AS OTHERS

Note: For PDTC Nominee included in the list, please indicate further the beneficial owners owning more than 5% of any class of the company's voting securities. Attach separate sheet, if necessary.

*Independent Director

GENERAL INFORMATION SHEET

STOCK CORPORATION

===== PLEASE PRINT LEGIBLY =====

CORPORATE NAME: APC GROUP, INC.

TOTAL NUMBER OF STOCKHOLDERS:	NO. OF STOCKHOLDERS WITH 100 OR MORE SHARES EACH:
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TOTAL ASSETS BASED ON LATEST AUDITED FS:

STOCKHOLDER'S INFORMATION

NAME, NATIONALITY AND CURRENT RESIDENTIAL ADDRESS	SHARES SUBSCRIBED				AMOUNT PAID (PhP)	TAX IDENTIFICATION NO. (TIN) FOR FILIPINOS or PASSPORT NO. FOR FOREIGNERS
	TYPE	NUMBER	AMOUNT (PhP)	% OF OWNER-SHIP		
8. VIRGINIA A. YAP Filipino No. 7, Felipe Street, Makati City	C	1	10,001.00		10,001.00	109-337-969
	TOTAL	1	10,001.00			
9. ELIZABETH ANNE C. UYCHACO Filipino No. 10, M. Amorsolo West, Rockwell Cond., Makati City	C	1	1.00		1.00	103-106-375
	TOTAL	1	1.00			
10. ROGELIO R. CABUNAG Filipino No. 17, St. Martin Street, Valle Verde III, Pasig City	C	1	10,001.00		10,001.00	103-432-824
	TOTAL	1	1.00			
11. ARTHUR A. SY Filipino No. 23, Sto. Tomas, Urdaneta Village, Makati City	C	1	10,001.00		10,001.00	174-674-196
	TOTAL		10,001.00			
12.						
	TOTAL					
13.						
	TOTAL					
14. Others			601,010.00		601,010.00	
	TOTAL		7,511,208,987.00		3,971,258,399.00	
TOTAL AMOUNT OF SUBSCRIBED CAPITAL			7,511,809,997.00			
TOTAL AMOUNT OF PAID-UP CAPITAL					3,971,859,409.00	

INSTRUCTION: SPECIFY THE TOP 20 STOCKHOLDERS AND INDICATE THE REST AS OTHERS

Note: For PDTC Nominee included in the list, please indicate further the beneficial owners owning more than 5% of any class of the company's voting securities. Attach separate sheet, if necessary.

* Independent Director

GENERAL INFORMATION SHEET
STOCK CORPORATION

===== PLEASE PRINT LEGIBLY =====

CORPORATE NAME:						
TOTAL NUMBER OF STOCKHOLDERS:				NO. OF STOCKHOLDERS WITH 100 OR MORE SHARES EACH:		
TOTAL ASSETS BASED ON LATEST AUDITED FS:						
STOCKHOLDER'S INFORMATION						
NAME, NATIONALITY AND CURRENT RESIDENTIAL ADDRESS	SHARES SUBSCRIBED				AMOUNT PAID (PhP)	TAX IDENTIFICATION NO. (TIN) FOR FILIPINOS or PASSPORT NO. FOR FOREIGNERS
	TYPE	NUMBER	AMOUNT (PhP)	% OF OWNER- SHIP		
15. SEE ATTACHED						
	TOTAL					
16.						
	TOTAL					
17.						
	TOTAL					
18.						
	TOTAL					
19.						
	TOTAL					
20.						
	TOTAL					
21.						
	TOTAL					
TOTAL AMOUNT OF SUBSCRIBED CAPITAL						
TOTAL AMOUNT OF PAID-UP CAPITAL						
INSTRUCTION: SPECIFY THE TOP 20 STOCKHOLDERS AND INDICATE THE REST AS OTHERS						
Note: For PDTC Nominee included in the list, please indicate further the beneficial owners owning more than 5% of any class of the company's voting securities. Attach separate sheet, if necessary.						

GENERAL INFORMATION SHEET

STOCK CORPORATION

===== PLEASE PRINT LEGIBLY =====			
CORPORATE NAME: APC GROUP, INC.			
1. INVESTMENT OF CORPORATE FUNDS IN ANOTHER CORPORATION		AMOUNT (PhP)	DATE OF BOARD RESOLUTION
1.1 STOCKS		157,612,796.00	
1.2 BONDS/COMMERCIAL PAPER (Issued by Private Corporations)			
1.3 LOANS/ CREDITS/ ADVANCES		122,900,613.00	
1.4 GOVERNMENT TREASURY BILLS			
1.5 OTHERS			
2. INVESTMENT OF CORPORATE FUNDS IN ACTIVITIES UNDER ITS SECONDARY PURPOSES (PLEASE SPECIFY:)		DATE OF BOARD RESOLUTION	DATE OF STOCKHOLDERS RATIFICATION
3. TREASURY SHARES		NO. OF SHARES	% AS TO THE TOTAL NO. OF SHARES ISSUED
		7,606,000	0.00
4. UNRESTRICTED/UNAPPROPRIATED RETAINED EARNINGS AS OF END OF LAST FISCAL YEAR: N/A			
5. DIVIDENDS DECLARED DURING THE IMMEDIATELY PRECEDING YEAR: N/A			
TYPE OF DIVIDEND		AMOUNT (PhP)	DATE DECLARED
5.1 CASH			
5.2 STOCK			
5.3 PROPERTY			
TOTAL			
6. ADDITIONAL SHARES ISSUED DURING THE PERIOD: N/A			
DATE	NO. OF SHARES	AMOUNT	
SECONDARY LICENSE/REGISTRATION WITH SEC AND OTHER GOV'T AGENCY:			
NAME OF AGENCY:	SEC	B S P	I C
TYPE OF LICENSE/REGN.	Permit to Offer Securities For Sale (Stock Option Plan)		
DATE ISSUED:	7/12/1996		
DATE STARTED OPERATIONS:	10/15/1993		
TOTAL ANNUAL COMPENSATION OF DIRECTORS DURING THE PRECEDING FISCAL YEAR (in PhP) PHP1,980,000.00	TOTAL NO. OF OFFICERS 2	TOTAL NO. OF RANK & FILE EMPLOYEES 4	TOTAL MANPOWER COMPLEMENT 6

NOTE: USE ADDITIONAL SHEET IF NECESSARY

I, EDMUNDO L. TAN, Corporate Secretary OF THE ABOVE-MENTIONED
(NAME) (POSITION)


CORPORATION DECLARE UNDER THE PENALTY OF PERJURY, THAT ALL MATTERS SET FORTH IN THIS GENERAL INFORMATION SHEET WHICH CONSISTS OF (8) PAGES HAVE BEEN MADE IN GOOD FAITH, DULY VERIFIED BY ME AND TO THE BEST OF MY KNOWLEDGE AND BELIEF, ARE TRUE AND CORRECT.

I UNDERSTAND THAT THE FAILURE OF THE CORPORATION TO FILE THIS GIS FOR FIVE (5) CONSECUTIVE YEARS SHALL BE CONSTRUED AS NON-OPERATION OF THE CORPORATION AND A GROUND FOR THE REVOCATION OF THE CORPORATIONS CERTIFICATE OF INCORPORATION. IN THIS EVENTUALITY, THE CORPORATION HEREBY WAIVES ITS RIGHT TO A HEARING FOR THE SAID REVOCATION.

DONE THIS APR 05 2013 OF _____ 2013 IN PASIG CITY.


(SIGNATURE)

SUBSCRIBED AND SWORN TO BEFORE ME IN PASIG CITY CITY/PROVINCE, PHILIPPINES ON APR 05 2013, AFFIANT PERSONALLY APPEARED BEFORE ME AND EXHIBITED TO ME HIS COMMUNITY TAX CERTIFICATE NO. 0722749 ISSUED AT PASIG CITY ON JANUARY 15, 2013 AND DRIVER'S LIC. NO. 11-67-010751 AS A COMPETENT EVIDENCE OF HIS IDENTITY.


LINDY ANDREA P. ABLANA
Notary Public for Pasig City
Appointed by Sec. 119 (2012-013)

DOC. NO: 281 :
PAGE NO. 57 :
BOOK NO. 7 :
SERIES OF 2013

NOTARY PUBLIC FOR _____ CITY/PROVINCE
Notarial Commission No. 1-000, Exchange Road
Commission expires on December 31, Manila
Roll of Attorney Number 1/08/2013; Pasig City
PTR No. 913927; 01/04/2013; RSM/Roll No. 57986
JBP No. Exempt from MCLC Compliance
MCLC Governing Board Order No. 1-2008(4 July 2008)
Office Address: _____



109032012000971



SECURITIES AND EXCHANGE COMMISSION

SEC Building, EDSA, Greenhills, Mandaluyong City, Metro Manila, Philippines
Tel: (632) 726-0931 to 39 Fax: (632) 725-5293 Email: mis@sec.gov.ph

Barcode Page

The following document has been received:

Receiving Officer/Encoder : Reiner SJ. Antonio
Receiving Branch : SEC Head Office
Receipt Date and Time : September 03, 2012 02:18:48 PM
Received From : Head Office

Company Representative

Doc Source

Company Information

SEC Registration No. AS93008127
Company Name APC GROUP INC.
Industry Classification
Company Type Stock Corporation

Document Information

Document ID 109032012000971
Document Type GENERAL INFORMATION SHEET
Document Code GIS
Period Covered June 06, 2012
No. of Days Late 0
Department CED/CFD/CRMD/MRD
Remarks Amended
W/ LETTER



APC GROUP INC.

28 August 2012

CORPORATION FINANCE DEPARTMENT
Securities and Exchange Commission
EDSA, Mandaluyong City

Attention: **Atty. JUSTINA F. CALLANGAN**
Acting Director

Re: Letter dated 8 August 2012
Re: APC Group, Inc.'s 2012 General Information Sheet

Gentlemen:

In compliance with your letter dated 8 August 2012 addressed to Mr. Frederic C. DyBuncio which we received on 24 August 2012, we transmit herewith the Amended General Information Sheet containing amendments to pages three and four as well as list of Top Twenty Stockholders with their corresponding Tax Identification Numbers (TIN).

We regret to inform you, however, that despite our best efforts we were only able to retrieve the TIN of the 17 stockholders out of the top 20 stockholders. The TIN of the 3 stockholders which were not available are as follows:

1. Lim Siew Kim
2. Tak Chang Investments Co., Ltd.
3. Dharmala Sec. (Phils), Inc.

As to the first and second stockholders above, which are both foreign, the company has no contact with them for a very long time and cannot anymore locate their whereabouts. The third stockholder, we understand has already dissolved and ceased operations, and there appears to be no record of its registration at the SEC online website the last time we inquired.

We trust that the foregoing is in order.

Very truly yours

RICHARD ANTHONY D. ALCAZAR
Asst. Corporate Secretary

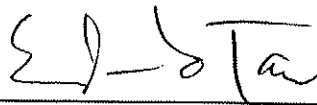
REPUBLIC OF THE PHILIPPINES)
PASIG CITY) S.S.

AFFIDAVIT OF UNDERTAKING

I, **EDMINDO L. TAN**, after having been first sworn to in accordance with law, hereby depose and say:

1. That I am the corporate secretary of APC Group, Inc. ("Corporation");
2. That on 24 August 2012, we received a letter from the Securities and Exchange Commission dated 8 August 2012 directing us to submit an amended GIS indicating the independent directors and the Tax Identification Numbers (TIN) of the top 20 stockholders;
3. Despite our best efforts, the Corporation was only able to retrieve the TIN of the 17 stockholders out of the top 20 stockholders. As to the remaining three (3) stockholders namely: Lim Siew Kim, Tak Chang Investments Co. Ltd., and Dharmala Sec. (Phils.) Inc., the Corporation has no contact with them for a long time and their whereabouts are currently unknown.
4. In behalf of the Corporation, I manifest our willingness and undertake to continue our efforts in locating the said stockholders and to submit their TIN as soon as we are able to retrieve them.
5. That I am executing this Affidavit in compliance with the requirements of the SEC and for whatever legal purpose it may serve.

IN WITNESS WHEREOF, this Affidavit has been signed on this
SEP 03 2012 in PASIG CITY.



EDMUNDO L. TAN

Affiant

SUBSCRIBED AND SWORN to before me SEP 03 2012 day of _____ 2012, at Pasig City, affiant exhibiting to me his Comm. Tax Cert. No. 11139797 issued on January 12, 2012 at Pasig City Tax and Driver's License #N11-67-010751 as a competent evidence of his identity.

Doc. No. 323 ;
Page No. 66 ;
Book No. 1 ;
Series of 2012.

RAMON ALFREDO E. DELA CRUZ
Notary Public for & in Pasig City
Appointment No. 226 (2011-2012)
Commission Expires on Dec. 31, 2012
2203 A East Tower, PSE Centre, Exchange Rate
Ortigas Center, Pasig City, Metro Manila
PTR No 7552886, 01/10/12; Pasig City
IBP No 879464; 01/05/12; RSM / Roll No. 59391
Exempt from MCLE Compliance,
MCLE Governing Board Order No. I-2008 (4 July 2008)

(AMENDED)

GENERAL INFORMATION SHEET (GIS)

FOR THE YEAR 2012
STOCK CORPORATION

GENERAL INSTRUCTIONS:

1. FOR USER CORPORATION: THIS GIS SHOULD BE SUBMITTED WITHIN THIRTY (30) CALENDAR DAYS FROM THE DATE OF THE ANNUAL STOCKHOLDERS' MEETING. DO NOT LEAVE ANY ITEM BLANK. WRITE "N.A." IF THE INFORMATION REQUIRED IS NOT APPLICABLE TO THE CORPORATION OR "NONE" IF THE INFORMATION IS NON-EXISTENT.
2. IF NO MEETING IS HELD, THE CORPORATION SHALL SUBMIT THE GIS TOGETHER WITH AN AFFIDAVIT OF NON-HOLDING OF MEETING WITHIN THIRTY (30) CALENDAR DAYS FROM THE DATE OF THE SCHEDULED ANNUAL MEETING (AS PROVIDED IN THE BY-LAWS). HOWEVER, SHOULD AN ANNUAL STOCKHOLDERS' MEETING BE HELD THEREAFTER, A NEW GIS SHALL BE SUBMITTED/FILED.
3. THIS GIS SHALL BE ACCOMPLISHED IN ENGLISH AND CERTIFIED AND SWORN TO BY THE CORPORATE SECRETARY OF THE CORPORATION.
4. THE SEC SHOULD BE TIMELY APPRISED OF RELEVANT CHANGES IN THE SUBMITTED INFORMATION AS THEY ARISE. FOR CHANGES RESULTING FROM ACTIONS THAT AROSE BETWEEN THE ANNUAL MEETINGS, THE CORPORATION SHALL SUBMIT ONLY THE AFFECTED PAGE OF THE GIS THAT RELATES TO THE NEW INFORMATION TOGETHER WITH A COVER LETTER SIGNED BY THE CORPORATE SECRETARY OF THE CORPORATION. THE PAGE OF THE GIS AND COVER LETTER SHALL BE SUBMITTED WITHIN SEVEN (7) DAYS AFTER SUCH CHANGE OCCURRED OR BECAME EFFECTIVE.
5. SUBMIT TWO (2) COPIES OF THE GIS TO THE CENTRAL RECEIVING SECTION, GROUND FLOOR, SEC BLDG., EDSA, MANDALUYONG CITY. ALL COPIES SHALL UNIFORMLY BE ON A4 OR LETTER-SIZED PAPER WITH A STANDARD COVER PAGE. THE PAGES OF ALL COPIES SHALL USE ONLY ONE SIDE. CORPORATIONS SUBMITTING A COPY OF THEIR GIS ONLINE OR VIA INTERNET SHALL SUBMIT ONE (1) HARD COPY OF THE GIS, TOGETHER WITH A CERTIFICATION UNDER OATH BY ITS CORPORATE SECRETARY THAT THE COPY SUBMITTED ONLINE CONTAINS THE EXACT DATA IN THE HARD COPY.
6. ONLY THE GIS ACCOMPLISHED IN ACCORDANCE WITH THESE INSTRUCTIONS SHALL BE CONSIDERED AS HAVING BEEN FILED.
7. THIS GIS MAY BE USED AS EVIDENCE AGAINST THE CORPORATION AND ITS RESPONSIBLE DIRECTORS/OFFICERS FOR ANY VIOLATION OF EXISTING LAWS, RULES AND REGULATIONS

***** PLEASE PRINT LEGIBLY *****

CORPORATE NAME: APC GROUP, INC.		DATE REGISTERED: 10/15/1993
BUSINESS/TRADE NAME:		FISCAL YEAR END: December 31
SEC REGISTRATION NUMBER: AS-093-8127	CORPORATE TAX IDENTIFICATION NUMBER (TIN) 002-834-075	
DATE OF ANNUAL MEETING PER BY-LAWS: SECOND THURSDAY OF JUNE	WEBSITE/URL ADDRESS:	
ACTUAL DATE OF ANNUAL MEETING: 6-Jun-12	E-MAIL ADDRESS:	
COMPLETE PRINCIPAL OFFICE ADDRESS: 10th Floor, Philcom Building, 8755 Paseo de Roxas, Makati City	FAX NUMBER: 854-02-59	
COMPLETE BUSINESS ADDRESS: 8th Floor, Philcom Building, 8755 Paseo de Roxas, Makati City	NAME OF EXTERNAL AUDITOR & ITS SIGNING PARTNER: SYCIP, GORRES, VELAYO & CO.	TELEPHONE NUMBER(S): 8450614
	SEC ACCREDITATION NUMBER (if applicable):	
PRIMARY PURPOSE/ACTIVITY/INDUSTRY PRESENTLY ENGAGED IN: Investments	INDUSTRY CLASSIFICATION: Financial Intermediary	GEOGRAPHICAL CODE:

***** INTERCOMPANY AFFILIATIONS *****

PARENT COMPANY	SEC REGISTRATION NO.	ADDRESS
SUBSIDIARY/AFFILIATE	SEC REGISTRATION NO.	ADDRESS

NOTE: USE ADDITIONAL SHEET IF NECESSARY

GENERAL INFORMATION SHEET

STOCK CORPORATION

===== PLEASE PRINT LEGIBLY =====

CORPORATE NAME: APC GROUP, INC.

CAPITAL STRUCTURE

AUTHORIZED CAPITAL STOCK

	TYPE OF SHARES *	NUMBER OF SHARES	PAR/STATED VALUE	AMOUNT (PhP) (No. of shares X Par/Stated Value)
	COMMON	14,000,000,000	1.00	14,000,000,000.00
	PREFERRED	6,000,000,000	1.00	6,000,000,000.00
TOTAL		20,000,000,000	TOTAL P	20,000,000,000.00

SUBSCRIBED CAPITAL

FILIPINO	NO. OF STOCK-HOLDERS	TYPE OF SHARES *	NUMBER OF SHARES	NUMBER OF SHARES IN THE HANDS OF THE PUBLIC **	PAR/STATED VALUE	AMOUNT (PhP)	% OF OWNERSHIP
	621	COMMON	7,511,809,999		1.00	7,360,608,534.00	98%
TOTAL			7,511,809,999	TOTAL	TOTAL P	7,360,608,534.00	98%

FOREIGN (INDICATE BY NATIONALITY)	NO. OF STOCK-HOLDERS	TYPE OF SHARES *	NUMBER OF SHARES	NUMBER OF SHARES IN THE HANDS OF THE PUBLIC **	PAR/STATED VALUE	AMOUNT (PhP)	% OF OWNERSHIP
	5	COMMON	154,359,533		1.00	151,201,463.00	2%
Percentage of Foreign Equity :			TOTAL 154,359,533	TOTAL	TOTAL P	151,201,463.00	2%
TOTAL SUBSCRIBED P						7,511,809,997.00	

PAID-UP CAPITAL

FILIPINO	NO. OF STOCK-HOLDERS	TYPE OF SHARES *	NUMBER OF SHARES	PAR/STATED VALUE	AMOUNT (PhP)	% OF OWNERSHIP
	621	COMMON	2,813,630,117	1.00	2,813,630,117.00	75%
TOTAL			2,813,630,117	TOTAL P	2,813,630,117.00	75%

FOREIGN (INDICATE BY NATIONALITY)	NO. OF STOCK-HOLDERS	TYPE OF SHARES *	NUMBER OF SHARES	PAR/STATED VALUE	AMOUNT (PhP)	% OF OWNERSHIP
	5	COMMON	154,359,533	1.00	154,359,533.00	25%
TOTAL			154,359,533	TOTAL P	154,359,533.00	25%
TOTAL PAID-UP P					2,967,989,650.00	

NOTE: USE ADDITIONAL SHEET IF NECESSARY

** Other than Directors, Officers, Shareholders owning 10% of outstanding shares.

GENERAL INFORMATION SHEET
STOCK CORPORATION

===== PLEASE PRINT LEGIBLY =====

CORPORATE NAME: APC GROUP, INC.

DIRECTORS / OFFICERS

NAME, NATIONALITY AND CURRENT RESIDENTIAL ADDRESS	INC'R	BOARD	STOCK HOLDER	OFFICER	EXEC. COMM.	TAX IDENTIFICATION NO. (TIN) FOR FILIPINOS or PASSPORT NO. FOR FOREIGNERS
1. WILLY N. OCIER #32 Wilson St., Greenhills, San Juan Metro Manila	N	C	Y		C	101-934-954 Filipino
2. JERRY C. TIU * No. 5, Urdaneta St., Urdaneta Village, Makati City	N	M	Y	N/A		106-218-979 Filipino
3. MANUEL A. GANA No. 8, San Antonio St., Magallanes Village Makati City	N	M	Y	N/A		906-105-404 Filipino
4. FREDERIC C. DYBUNCIO 39B, Manila Tower Residencia, Greenbelt Esperanza, Makati City	N	M	Y	President & CEO		103-192-854 Filipino
5. BERNARDO D. LIM 83 Kyoto Street, B.F. Homes Parañaque City	N	M	Y	EVP/CFO		112-436-550 Filipino
6. EDMUNDO L. TAN 25 Padre Burgos Street, Ayala Heights Quezon City	N	M	Y	Corp. Secretary		132-173-235 Filipino
7. TOMAS D. SANTOS * No. 8, Harding Street, West Greenhills San Juan City	N	M	Y	N/A		100-061-178 Filipino
8. RICHARD ANTHONY D. ALCAZAR 3 Kaimito Avenue, Town & Country Exe. Village, Antipolo, Rizal	N	N	N	Asst. Corp. Secretary		178-486-310 Filipino
9. VIRGINIA A. YAP No. 7, Felipe Street, Makati City	N	M	Y	N/A		109-337-969 Filipino
10. ELIZABETH ANNE C. UYCHACO No. 10, M. Amorsolo West, Rockwell Cond., Makati City	N	M	Y	N/A		103-106-375 Filipino
11. ROGELIO R. CABUÑAG No. 17, St. Martin Street, Valle Verde III, Pasig City	N	M	Y	N/A		103-432-824
12. ARTHUR A. SY No. 23 Sto. Tomas Street, Urdaneta Village, Makati City	N	M	Y	N/A		174-674-196 Filipino
13.						

***Independent Director**

INSTRUCTIONS:

FOR BOARD COLUMN, PUT "C" FOR CHAIRMAN, "M" FOR MEMBER, "I" FOR INDEPENDENT DIRECTOR.

FOR INC'R COLUMN, PUT "Y" IF AN INCORPORATOR, "N" IF NOT.

FOR STOCKHOLDER COLUMN, PUT "Y" IF A STOCKHOLDER, "N" IF NOT.

FOR OFFICER COLUMN, INDICATE PARTICULAR POSITION IF AN OFFICER, FROM VP UP INCLUDING THE POSITION OF THE TREASURER, SECRETARY, COMPLIANCE OFFICER AND/OR ASSOCIATED PERSON.

FOR EXECUTIVE COMMITTEE, INDICATE "M" IF MEMBER OF THE COMPENSATION COMMITTEE, "A" FOR AUDIT COMMITTEE, "N" FOR NOMINATION AND ELECTION COMMITTEE. ADDITIONALLY WRITE "C" AFTER SLASH IF CHAIRMAN AND "M" IF MEMBER.

*Independent Director

GENERAL INFORMATION SHEET
STOCK CORPORATION

===== PLEASE PRINT LEGIBLY =====

CORPORATE NAME: APC GROUP, INC.

TOTAL NUMBER OF STOCKHOLDERS:

NO. OF STOCKHOLDERS WITH 100 OR MORE SHARES EACH: 100

TOTAL ASSETS BASED ON LATEST AUDITED FINANCIAL STATEMENTS:

STOCKHOLDER'S INFORMATION

NAME, NATIONALITY AND CURRENT RESIDENTIAL ADDRESS	SHARES SUBSCRIBED				AMOUNT PAID (PhP)	TAX IDENTIFICATION NO. (TIN) FOR FILIPINOS or PASSPORT NO. FOR FOREIGNERS
	TYPE	NUMBER	AMOUNT (PhP)	% OF OWNER- SHIP		
1. WILLY N. OCIER Filipino #32 Wilson St., San Juan, Greenhills, M.M.	C	570,001	570,001.00		570,001.00	101-934-954
	TOTAL	570,001	570,001.00			
2. JERRY C. TIU * Filipino No. 5 , Urdaneta St., Urdaneta Village Makati City	C	1	1.00		1.00	106-218-979
	TOTAL	1	1.00			
3. MANUEL A. GANA Filipino No. 22, Jacinto St., Little Baguio, San Juan M.M.	C	1	1.00		1.00	904-105-404
	TOTAL	1	1.00			
4. FREDERIC C. DYBUNCIO Filipino 39B, Manila Tower Residencia , Greenbelt Makati City	C	1	1.00		1.00	103-192-854
	TOTAL	1	1.00			
5. BERNARDO D. LIM Filipino 83 Kyoto Street, B.F. Homes Paranaque City		1,000	1,000.00		1,000.00	112-436-550
	TOTAL	1,000	1,000.00			
6. EDMUNDO L. TAN Filipino 25 Padre Burgos St., Ayala Heights Village Quezon City	C	1	1.00		1.00	132-173-235
	TOTAL	1	1.00			
7. TOMAS D. SANTOS * Filipino No. 8 Harding Street, West Greenhills San Juan City	C	1	1.00		1.00	100-061-178
	TOTAL	1	1.00			
TOTAL AMOUNT OF SUBSCRIBED CAPITAL						
TOTAL AMOUNT OF PAID-UP CAPITAL						

INSTRUCTION: SPECIFY THE TOP 20 STOCKHOLDERS AND INDICATE THE REST AS OTHERS

Note: For PDTC Nominee included in the list, please indicate further the beneficial owners owning more than 5% of any class of the company's voting securities. Attach separate sheet, if necessary.

*Independent Director

GENERAL INFORMATION SHEET
STOCK CORPORATION

===== PLEASE PRINT LEGIBLY =====

CORPORATE NAME: APC GROUP, INC.

TOTAL NUMBER OF STOCKHOLDERS: _____ NO. OF STOCKHOLDERS WITH 100 OR MORE SHARES EACH: _____

TOTAL ASSETS BASED ON LATEST AUDITED FS: _____

STOCKHOLDER'S INFORMATION

NAME, NATIONALITY AND CURRENT RESIDENTIAL ADDRESS	SHARES SUBSCRIBED				AMOUNT PAID (PhP)	TAX IDENTIFICATION NO. (TIN) FOR FILIPINOS or PASSPORT NO. FOR FOREIGNERS
	TYPE	NUMBER	AMOUNT (PhP)	% OF OWNERSHIP		
8. VIRGINIA A. YAP Filipino No. 7, Felipe Street, Makati City	C	1	10,001.00		10,001.00	109-337-869
	TOTAL	1	10,001.00			
9. ELIZABETH ANNE C. UYCHACO Filipino No. 10, M. Amorsolo West, Rockwell Cond., Makati City	C	1	1.00		1.00	103-106-375
	TOTAL	1	1.00			
10. ROGELIO R. CABUÑAG Filipino No. 17, St. Martin Street, Valle Verde III, Pasig City	C	1	10,001.00		10,001.00	103-432-824
	TOTAL	1	10,001.00			
11. ARTHUR A. SY Filipino No. 23, Sto. Tomas, Urdaneta Village, Makati City	C	1	10,001.00		10,001.00	174-674-186
	TOTAL		10,001.00			
12.						
	TOTAL					
13.						
	TOTAL					
14. Others			601,010.00		601,010.00	
	TOTAL		7,511,208,987.00			
TOTAL AMOUNT OF SUBSCRIBED CAPITAL			7,511,809,997.00			
TOTAL AMOUNT OF PAID-UP CAPITAL					3,971,859,409.00	

INSTRUCTION: SPECIFY THE TOP 20 STOCKHOLDERS AND INDICATE THE REST AS OTHERS


Note: For PDTC Nominee included in the list, please indicate further the beneficial owners owning more than 5% of any class of the company's voting securities. Attach separate sheet, if necessary.

I, EDMUNDO L. TAN, Corporate Secretary OF THE ABOVE-MENTIONED
(NAME) (POSITION)


CORPORATION DECLARE UNDER THE PENALTY OF PERJURY, THAT ALL MATTERS SET FORTH IN THIS GENERAL INFORMATION SHEET WHICH CONSISTS OF (7) PAGES HAVE BEEN MADE IN GOOD FAITH, DULY VERIFIED BY ME AND TO THE BEST OF MY KNOWLEDGE AND BELIEF, ARE TRUE AND CORRECT.

I UNDERSTAND THAT THE FAILURE OF THE CORPORATION TO FILE THIS GIS FOR FIVE (5) CONSECUTIVE YEARS SHALL BE CONSTRUED AS NON-OPERATION OF THE CORPORATION AND A GROUND FOR THE REVOCATION OF THE CORPORATIONS CERTIFICATE OF INCORPORATION. IN THIS EVENTUALITY, THE CORPORATION HEREBY WAIVES ITS RIGHT TO A HEARING FOR THE SAID REVOCATION.

DONE THIS JUN 28 2012 DAY OF _____ 2012 IN PASIG CITY.


(SIGNATURE)

SUBSCRIBED AND SWORN TO BEFORE ME IN PASIG CITY CITY/PROVINCE, PHILIPPINES ON JUN 28 2012, AFFIANT PERSONALLY APPEARED BEFORE ME AND EXHIBITED TO ME HIS COMMUNITY TAX CERTIFICATE NO. 11139797 ISSUED AT PASIG CITY ON JANUARY 12, 2012 AND DRIVER'S LIC. NO. 11-67-010751 AS A COMPETENT EVIDENCE OF HIS IDENTITY.


LINDY ANNE P. PABLANA
Notary Public for Pasig City
Appointment No. 119 (2012-2013)

NOTARY PUBLIC FOR Pasig City expires on Dec 31, 2013 CITY/PROVINCE

DOC. NO: 62 :
PAGE NO. 14 :
BOOK NO. I :
SERIES OF 2012 :

No. 1001 Commission No. SE Centre Exchange Road

Commission expires on December 31

Roll of Attorney Number 01/02/2012; Makati City

IBP No. 875977; 12/28/2011; RSM / Roll No. 57986

IBP No. Exempt from MCLE Compliance,

Office Address: _____
MCLE Governing Board Order No. 1-2008 (4 July 2008)

APC GROUP, INC.
TOP TWENTY STOCKHOLDERS

	CITIZENSHIP	TIN Number	Percentage to Total
1. Belle Corporation	Filipino	000-156-011-000	46.59
2. PCD Nominee Corporation – Filipino	Filipino	050-004-710-690	30.44
3. Dominion Equities, Inc	Filipino	005-378-235	4.53
4. Compact Holdings, Inc.	Filipino	000-527-434	3.74
5. Integrated Holdings, Inc.	Filipino	003-931-507	2.40
6. Elite Holdings, Inc.	Filipino	206-716-852	2.24
7. Parallax Resources, Inc.	Filipino	047-004-518-297	2.20
8. PCD Nominee Corporation-Non-Filipino	Foreign	050-004-710-690	1.54
9. Equinox International Resources Corp.	Filipino	004-471-643	1.33
10. Richold Investor Corporation	Filipino	004-672-012	1.33
11. Gilt-Edged Properties, Inc.	Filipino	000-459-370	0.91
12. Headland Holdings Corporation	Filipino	002-396-633	0.74
13. Eastern Sec. Dev. Corp.	Filipino	000-329-281-000	0.32
14. Lim Siew Kim	Foreign		0.24
15. Tak Chang Investments Co., Ltd.	Foreign		0.24
16. Coscolluela, William V.	Filipino	105-348-782	0.13
17. Reyes, Vicente O. ITF:Peter Paul Phil. Cor	Filipino	000-282-561-00	0.11
18. Dharmala Sec. (Phils), Inc.	Filipino		0.07
19. Singson, Evelyn R. ITF: Gilt-Edged Prop.	Filipino	108-783-149	0.05
20. Corporate Inv. Phils., Inc.	Filipino	050-000-447-095	0.04