



Law Office of Clifford J. Hunt, P.A.

Reply to:
cjh@huntlawgrp.com

April 15, 2024

OTC Markets Group, Inc.
304 Hudson Street, 3rd Floor
New York, New York 10013

**Re: Apple Rush Company, Inc. Annual Report for period ended
December 31, 2023**

Dear Sir or Madam:

This law firm serves as counsel to Apple Rush Company, Inc. (hereinafter the "Company") and has been retained by the Company for the purposes of (a) entering into the Attorney Letter Agreement with OTC Markets Group, Inc. (hereinafter "OTC Markets") and (b) posting this letter on the OTC Disclosure and News Service in accordance with the requirements set forth in the Attorney Letter Agreement. OTC Markets is entitled to rely on this letter in determining whether the Company has made adequate current information publicly available within the meaning of Securities and Exchange Commission Rule 144(c)(2), promulgated under the Securities Act of 1933, as amended.

This law firm provides ongoing representation to the Company regarding securities and general corporate matters that are brought to our attention from time to time by Company principals. The undersigned Attorney is a resident of the United States of America and has been retained by the Company for the purpose of rendering this letter and related matters. The undersigned Attorney is licensed to practice law in the state of Florida and this letter covers the jurisdiction of Florida and the applicable laws of the United States of America. The undersigned Attorney is permitted to practice before the United States Securities and Exchange Commission ("SEC") and has not been prohibited from practice thereunder. Undersigned counsel is not currently and has not been in the past five years, suspended or barred from practicing in any state or jurisdiction, and has not been charged in a civil or criminal case. Undersigned counsel is not currently, and has not been in the past five years, the subject of an investigation, hearing, or proceeding by the SEC, the U.S. Commodity Futures Trading Commission ("CFTC"), the Financial Industry Regulatory Authority ("FINRA"), or any other federal, state, or foreign regulatory agency.

As of the date of this letter, the undersigned Attorney is the beneficial owner of 25,000,000 shares of the Company's common stock that were gifted to him by a "non-affiliate" shareholder on November 8, 2019. There is no restriction on such shares. No member of this law firm has any agreement with the Company to receive any shares of its securities in payment for services presently or in the future.

In rendering this letter, I have examined the Annual Report for the period ending December 31, 2023; and financial statements for the period ending December 31, 2023, hereinafter collectively referred to as (the "Report") and which were posted by the Company on the OTC Disclosure and News Service on April 15, 2024. I also have examined the Quarterly Report for the period ending March 31, 2023 (filed August 14, 2023); the Quarterly Report for the period ending June 30, 2023 (filed August 14, 2023); and the Quarterly Report for the period ending September 30, 2023 (filed December 4, 2023). I also have examined such other Company records, certificates of officers, and other instruments and documents and such questions of law as I have considered necessary and appropriate as a basis for the opinions expressed herein and for purposes of rendering this letter. As to matters of fact, I have relied upon information obtained from public officials, officers the issuer and other sources. All of the sources noted above are deemed to be reliable.

In rendering this letter, the undersigned Attorney has personally met with management via a Zoom video conference call, consisting of Mr. David A. Torgerud, who is the Chief Executive Officer, Chief Financial Officer and sole director of the Company and has reviewed the Report published by the Company through the OTC Disclosure & News Service and personally discussed the Report with Mr. Torgerud.

In my opinion, the Report constitutes "adequate current information" concerning the Company and its securities and that "is available" within the meaning of SEC Rule 144(c)(2) under the Securities Act of 1933 as a result of such Report being posted in the OTC Disclosure and News Service on April 15, 2024, and that the Report includes all of the information that a broker-dealer would be required to obtain from the Company to publish a quotation for the common stock of the Company under SEC Rule 15c2-11 promulgated under the Securities Exchange Act of 1934, and that the Report complies as to form with the OTC Markets Group's OTC Pink Disclosure Guidelines.

The un-audited financial statements contained within the Report were prepared by Mr. Robin Hunt, President of Interactive Edgar Corp., which serves as a consultant for the Company. Mr. Hunt has over 25 years of experience as an executive officer, consultant, and principal in private business enterprises, as well as having over 25 years of experience in working with and understanding GAAP accounting principles.

The transfer agent for the Company is Securities Transfer Corporation, located at 2901 N. Dallas Parkway, Ste. 380, Plano, TX 75093. Securities Transfer Corporation is registered with the SEC. The undersigned Attorney personally confirmed with Mr. Torgerud, CEO and Chairman of the Board of Directors for the Company, and verified with Securities Transfer Corporation, the number of outstanding shares set forth in the Report as of the date of this letter.

To the best knowledge of this law firm, after inquiry of management and the Directors of the Company, neither the Company nor any 5% holder, or the undersigned Attorney, is currently under investigation by any federal or state regulatory authority for any violation of federal or state

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securities laws.

Undersigned counsel has been advised by present management and the former chief executive officer of the Company that the Company has never been a “shell company” and is not presently a “shell company” as such term is defined in SEC Rule 12b-2 and SEC Rule 144.

OTC Markets is hereby granted full and complete permission and rights to publish this letter through the OTC Disclosure and News Service for viewing by the public and regulators. This letter is rendered solely to OTC Markets and may not be relied upon by any other person or for any other purpose without the prior written consent of this law firm.

Sincerely,

LAW OFFICE OF CLIFFORD J. HUNT, P.A.

A handwritten signature in blue ink that reads "Clifford J. Hunt". The signature is written in a cursive style with a large, stylized initial 'C'.

Clifford J. Hunt, Esquire

cc: David A. Torgerud, CEO
Apple Rush Company, Inc.