

# PETER J. WILKE

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March 29, 2019

OTC Markets Group Inc.

304 Hudson Street - 2nd Floor New York, NY 10013

Re: Attorney Letter for AppTech Corp. (APCX) – fiscal year ending December 31, 2018

Ladies and Gentlemen:

I have been retained as special securities counsel to AppTech, a Wyoming corporation (the “Company”). The Company requested that I review the Company’s Annual Report as of December 31, 2018; posted on the OTC Disclosure and News Service (“Service”) March 29, 2019 – with unaudited Financial Statements posted on the Service March 29, 2019. OTC Markets Group, Inc. is entitled to rely on this letter in determining whether the Company has made adequate current information publicly available within the meaning of Rule 144(c)(2) under the Securities Act of 1933. OTC Markets Group, Inc. has full and complete permission and rights to publish this letter with the Service for viewing by the general public and regulators, but no person other than OTC Markets Group, Inc. may rely upon this Opinion in determining whether the Issuer has made adequate current information publicly available within the meaning of Rule 144(c)(2) of the Securities Act of 1933.

This Attorney Letter relates to the laws of the United States, including the Securities Act of 1933 and the corporate laws of the state of California. I am a resident of the United States, and a member in good standing of the Bar of the State of California since 1992. I retired from the Washington State Bar Association at the beginning of 2018, after 40 years of service. I am permitted to practice before the Securities and Exchange Commission (the “SEC”) and have not been prohibited from practice thereunder.

I am not currently, nor have I been in the past five years, suspended or barred from practicing in any state or jurisdiction, and have not been charged in a civil or criminal case. I do not own Company stock and have no agreement regarding the issuance of shares in the future related to my special legal counsel work on its behalf. I also write an occasional Section 4.(a)(1) legal opinion when requested by a Company shareholder (freeing up restricted common shares).

To render this opinion, I have examined such corporate records and other documents and such questions of law as I deemed necessary. In examining the documents, I have assumed the genuineness of signatures (both manual and conformed), the authenticity of documents submitted as originals, the conformity with originals of all documents furnished as copies, and the correctness of the facts set forth in such documents. During the course of my investigation, nothing came to my attention that led me to conclude that any such documents were not genuine or authentic or that the facts set forth therein were not true. This opinion is expressed solely on the facts and assumptions as set forth herein and is specifically limited to the investigations and examinations I deemed necessary. After such investigations, I know of no facts which lead me to conclude that any opinion set forth below is not correct. With respect to matters of a factual nature, I have relied on information obtained from Directors and Officers of the Company as well as other sources, and these sources are believed to be reliable.

My last Attorney Letter on behalf of the Company was posted on the Service June 8, 2018. The following list represents those documents that have been made publicly available, including the date this information was posted with the Service, and further represents those documents I reviewed in connection with the preparation of this letter of opinion (the "Information"):

Annual Report as of December 31, 2018; posted on the Service March 29, 2019 – with un-audited Financial Statements posted on the Service March 29, 2019;

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11/20/2018	<a href="#">Supplemental Information - APPTTECH CORP- Issuer Information &amp; Disclosure Statement as of 9-30-2018 (Amended &amp; Restated)</a>
11/14/2018	<a href="#">Supplemental Information - APPTTECH CORP - Issuer Information &amp; Disclosure Statement as of 09-30-2018</a>
11/14/2018	<a href="#">Quarterly Report - APPTTECH CORP FS - 09-30-2018</a>
08/14/2018	<a href="#">Supplemental Information - APPTTECH CORP - Issuer Information &amp; Disclosure Statement as of 06-30-2018</a>
08/14/2018	<a href="#">Quarterly Report - APPTTECH CORP FS 06-30-2018</a>

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I have no reason to believe that at the time such information listed above was published to the Service, that any of the information contained an untrue statement of material fact or omitted to

state a material fact necessary in order to make the statements made, in light of the circumstances under which they were made, not misleading.

I have personally reviewed the Information as contained in the Articles of Incorporation, Company Bylaws and the Company's Quarterly and Annual Reports and unaudited Financial Statements for the time periods as contained above. I have also personally met with and discussed this information with management and a majority of the Directors of the Company (Gary Wachs, Luke D'Angelo, Michael Gross), and deemed them to be reliable sources of information as it relates to the information discussed and disclosed. The Company's financial statements were prepared by Gary Wachs, Company CFO, a Certified Public Accountant with over 35 years of experience including the preparation of GAAP compliant financial statements.

The Company's transfer agent is Transfer Online, Inc., a SEC registered transfer agent, reports 86,374,132 Company common shares issued as of March 27, 2019. The method used to obtain the number of outstanding shares of common stock of the Company as reported on the date hereof, was via the Company's Company Profile on otcmarkets.com as of March 28, 2019. By way of explanation regarding the number of outstanding common shares, the Company has cancelled shares since January 1, 2019, accounting for the difference in the number of outstanding shares stated above from that in the Annual Report for fiscal year 2018 (90,077,132).

After such limited examination, and other such investigation that I deemed necessary, I am of the opinion that:

Adequate current public information is now available concerning the Company within the meaning of Rule 144(c)(2) under the Securities Act, and the information includes all of the information that a broker-dealer would be required to obtain from the company to publish a quotation for the Securities pursuant to Rule 15c2-11 under the Securities Exchange Act of 1934, as amended. Further, this information as posted through the OTC Disclosure and News Service, complies as to form with the OTC Markets Group, Inc. Guidelines for Providing Adequate Current Information.

To the best of my knowledge neither the Company, any 5% holder of the Company's common stock, nor counsel is currently under investigation by any federal or state regulatory authority for a violation of federal or state securities laws.

The Company is not currently a shell company. According to its SEC public reporting (prior to the posting of its Form 15, voluntarily de-registering the Company in 2009), the Company's predecessor had little in the way of operating expenses (\$5290) from inception (July 2, 1998) through the end of its first fiscal year on December 31, 1998. However, its Form 10KSB reported approximately \$4.68 million in operating expenses (no revenues) for fiscal year 1999. Since then, the Company and its predecessors had significant operating expenses each fiscal year, and revenue most of those years. It is fair to say except for possible shell status during its predecessor's first fiscal year ending December 31, 1998, the Company and its predecessors have not operated as a shell company.

No person other than OTC Markets Group, Inc. is entitled to rely on this opinion, and I assume no obligation to update or supplement this opinion letter to reflect any change in fact or law which may hereafter occur.

Very Truly Yours,

A handwritten signature in dark ink, appearing to read "Pete Wilke", written on a light-colored rectangular background.

PETE WILKE