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September 14, 2012

OTC Markets Group Inc.
304 Hudson Street, 2nd Floor
New York, New York 10013

Re: Alaska Pacific Energy Corp. (the "Issuer")

Gentlemen:

The purpose of this letter is to provide an opinion of counsel to the OTC Markets Group Inc. ("OTC Markets Group") upon which the OTC Markets Group may rely in determining whether to permit quotations in the Issuer's common stock (the "Securities") on the OTC Markets Group quotation venue. Further, the OTC Markets Group is entitled to rely upon this opinion letter in determining whether the Issuer has made the adequate current information publicly available within the meaning of Rule 144(c)(2) of the Securities Act of 1933 (the "Securities Act").

The undersigned was retained by the Issuer under a written fee agreement dated September 6, 2012 to provide this legal opinion to the OTC Markets Group.

In forming my opinion, I have reviewed and examined such corporate records and other documents that I considered necessary or appropriate to provide this opinion to the OTC Markets Group. The information reviewed (i) constitutes "adequate current public information" under the Securities Act, (ii) includes all of the information that a broker-dealer would be required to obtain from the Issuer to publish a quotation for the Securities under Rule 15c211 under the Securities Act of 1934 (the 'Exchange Act'), (iii) complies as to form with the OTC Markets Group's Guidelines for Providing Adequate Current Information, which are located on the Internet at www.otcmarkets.com, and (iv) has posted through the OTC Disclosure and News Service.

The documents reviewed include those posted on the OTC Disclosure and News Service consisting of Quarterly Filings made on July 26, 2012 and Annual Filings made on July 12, 2012 regarding the Issuer's Financial Condition as well as filings made with the SEC prior to de-listing on July 25, 2011, the Issuer's Form 10 and subsequent filings include all of the information that a broker-dealer would be required to obtain from the Issuer to publish a quotation for the Securities under Rule 15c2-11 of the Exchange Act Rules and complies with the OTC Markets Group's Guidelines for Providing Adequate Current Information, which is located on the Internet at www.otcmarkets.com. Such information includes, but is not limited to:

- i. The Issuer's Articles of Incorporation, as amended, bylaws and other corporate documentation which includes the following information:
 - a. The exact name of the Issuer is Alaska Pacific Energy Corp. and it was incorporated on January 13, 2005.
 - b. The principal executive address of the Issuer is 2005 Costa Del Mar Road, Unit 625, Carlsbad, CA 92009.
 - c. The state of incorporation of the Issuer is Nevada.
 - d. The Issuer's title and class of securities are Common Stock. There are currently 2,000,000,000 common shares authorized, of which 848,786,968 have been issued and are outstanding. There are an additional 300,000 shares exercisable as options at an average price of \$.30 as discussed at Note 6 of the Footnotes to the Financial Statements issued as of April 30, 2012 and an 8% Note convertible into common shares for which 5,789,737 shares have been reserved.
 - e. The par value of the Common Stock and Preferred Stock is \$0.001.
 - f. The nature of the Issuer's business is that it is currently an exploration stage company engaged in the search for commercially viable minerals.
 - g. The nature and extent of the Issuer's facilities is that they have one executive office located at Unit 625, 2005 Costa Del Mar Road, Carlsbad CA, 92009.
 - h. The Board of Directors includes James R. King as the Chairman of the Board of Directors, and Timothea Welsh as Directors. The Issuer's Officers include James R. King who serves as the President & Treasurer and Timothea Welsh who serves as Secretary. (Allan Joseph Beaton P.Eng. Mining resigned his position subsequent to the release of financial statements and public disclosure through OTC Markets.)
- ii. The Issuer's Financial Statements for the year ended January 31, 2012, and quarter ended April 30, 2012, as certified by the Issuer.
- iii. The Issuer's Initial Company Information and Disclosure Statement as posted on the OTC Disclosure and News Service on July 26, 2012.

Moreover, I have resolved such questions of law, if any, as I have deemed necessary to provide this opinion to the OTC Markets Group. I have relied upon information of fact obtained from public officials, officers of the Issuer and other sources. I believe all such sources to be reliable.

On September 13, 2012, I met with a majority of directors and officers of the Issuer to discuss the Issuer's Initial Form 10, General Form For Registration of Securities and subsequent filings with the Securities and Exchange Commission Pursuant to Section 12(b) or (g) of The Securities Exchange Act of 1934 and subsequent filings made with the Securities and Exchange Commission as well as reviewing the information provided by the company infilings and disclosures posted via the OTC Markets.

The Issuer's transfer agent is Island Stock Transfer, LLC at 15500 Roosevelt Boulevard, Clearwater, FL 33760 telephone: 727-289-0010; facsimile: 727-289-0069; website: <http://www.islandstocktransfer.com>. The number of outstanding shares is 848,786,968 shares of common stock outstanding as of July 25, 2012. This number has been confirmed by reference to documents provided by Island Stock Transfer, LLC and the Issuer. Island Stock Transfer, LLC is a registered transfer agent with the SEC.

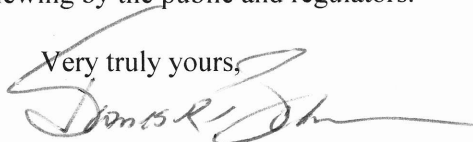
The financial statements contained in the Issuer's Annual Information and Disclosure Statement are not audited. The financial statements were prepared by the Issuer and its bookkeeper and attested to by its President.

To the best of our knowledge, information and belief, formed after inquiry of management and the directors of the Issuer, neither the Issuer, any 5% holder of the Issuer's Securities, nor the Issuer's counsel is currently under investigation by any federal or state regulatory authority for any violation of federal or state securities laws.

I am licensed to practice law in the State of Maryland and in the District of Columbia, am an "inactive" member of the bar in the State of Florida and am a citizen of the United States of America. I am permitted to practice before the Securities and Exchange Commission and have not been prohibited from practice hereunder. I do not express any opinion herein concerning any law other than the laws of the United States and the jurisdiction where we are permitted to render opinions as of the date hereof. I have had no prior relationship with the Issuer and have not rendered any services to the Issuer previously and have been retained solely for the purpose of reviewing the current information supplied by the issuer.

I furnish this opinion solely for the benefit of the OTC Market Group and the Issuer. This opinion is not to be used, circulated, quoted or otherwise referred in whole or in part for any other purpose. No person other than OTC Markets Group is entitled to rely on it. Further, we undertake no obligation to update this opinion based upon any changes occurring or matters that come to our attention after the date of this letter. This firm grants OTC Markets Group full and complete permission to publish this legal opinion through the OTC Disclosure' and News Service for viewing by the public and regulators.

Very truly yours,

A handwritten signature in dark ink, appearing to read "James R. J. Scheltema", written over a horizontal line.

James R. J. Scheltema

cc: Alaska Pacific Energy Corp.