

# E. FIGUERAS & ASSOCIATES, PA

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October 1, 2012

Pink OTC Markets, Inc.  
304 Hudson street, 2<sup>nd</sup> Floor  
New York, NY 10013

**Re: Attorney Letter with Respect to Current Information,  
Continuing Disclosure Requirements, American Pacific Rim Commerce Group,  
Periods ending May 31, 2012 and August 31, 2012.**

Dear Sir or Madam:

This office has been engaged by **American Pacific Rim Commerce Group**, a California corporation, (the "Issuer") only for and particularly for purposes of issuance of this letter with respect to adequate current information (the "Letter"), continuing disclosure requirements. The undersigned, as of the date of this Letter, does not represent, and has not previously represented the Issuer on any other matters

This Letter may be posted on the OTC Disclosure and News Service for viewing by the general public and OTC Markets Group may rely on this Letter in determining whether the Issuer has made current information publicly available within the meaning of Rule 144(c)(2) of the Securities Act of 1933 (the "Act"), as amended. This Letter may not be used for any other purpose and may not be relied upon by any other person or entity other than OTC Markets.

The undersigned is licensed in and a resident of the State of Florida. The undersigned is permitted to practice before the Securities and Exchange Commission and has not been prohibited from practice thereunder. I express no opinion herein concerning the applicability or effect of any laws of any other jurisdiction, or any Rules or statutes, except those Rules or statutes specifically cited in this Letter. For purposes of this Letter, the undersigned has reviewed:

1. Issuer's Annual Disclosure Statement for the period ending November 30, 2011 and posted March 5, 2012.
2. Issuer's Financial Statements for the period ending November 30, 2011 and posted March 5, 2012.
3. Issuer's Quarterly Disclosure Statement for the periods ending May 31, 2012 and August 31, 2012 and posted on August 27, 2012 and September 21, 2012, respectively.
4. Issuer's Quarterly Financial Statements for the periods ending May 31, 2012 and August 31, 2012 and posted on August 27, 2012 and September 21, 2012, respectively.

6. Such other corporate records as were necessary and provided by management for purposes of this letter.

This Letter is based upon documentation and facts made available by the Issuer and is solely based on those documents and facts. The Issuer, through its President and acting CEO, Raymond Talarico, has represented to the undersigned that the information contained therein is true and correct and believed to be true. In the event that the facts and information in all such documents are determined not to be true, this letter shall be null and void. The undersigned has personally met with Mr. Talarico who has attested as to the accuracy of the information provided for review as set forth herein. This Letter is further based upon those representations.

The Company was originally incorporated as International Environmental Technologies, Inc., a California corporation on December 11, 1996 ("IETI"). On March 1, 2004, the Company changed its name to Epic Media, Inc. ("EPIC"). On October 11, 2006, the Company changed its name to YouMee, Inc. ("YouMee"). On February 14, 2007 the Company changed its name to Liberty Presidential Investment Funds ("Liberty") and on February 27, 2008 the Company changed its name to American Pacific Rim Commerce Group ("APRCG").

The APRCG is a developmental stage company whose business plan calls for the launching of its proprietary e-commerce platform to promote commerce between U.S small and medium sized businesses and Chinese businesses and consumers through APRCG's website which is currently under development.

The corporate offices of the Issuer are located at 2985 West Highway 318, Citra, Florida 32113.

As of February 29, 2012, the authorized capital of the Issuer is 90,000,000 shares of common stock par value \$0.001 per share. According to the transfer agent's, shareholder list as of the same date, there were a total of 32,269,561 shares of common stock issued and outstanding. APRCG has 10,000,000 shares of preferred stock authorized at \$0.001 per share as of the same date

The fiscal year end for the Issuer is November 30. Financial Statements of the Issuer are prepared by management, and are un-audited. The primary officer preparing APRCG's financial statements is Mr. Raymond Talarico, it's President and acting CEO. No external accountant/auditor for the Issuer has yet to be retained.

Pursuant to Issuer's management's representation through Mr. Talarico, there are no threatened or pending legal proceedings against the Issuer and there are no defaults on senior securities.

The Transfer Agent for the Issuer is Fidelity Transfer Company, 8915 South 700 East, Suite 102, Sandy, UT 84070. Phone: (801) 562-1300; Fax (801) 233-0589..

In rendering I am a member of the Florida State Bar, and express no opinion herein concerning the applicability or effect of any laws of any other jurisdiction, except the securities laws of the United States of America referred to herein.

Based on the review of documentation as specifically set forth in this Letter and the discussions with management (i.e. Mr. Talarico), counsel is of the belief that (i) the information provided by the Issuer and posted on the OTC Markets Group web site constitutes "adequate public information" concerning the Securities of the Issuer and is "available" within the meaning of Rule 144(c)(2) of the Securities Act of 1933; and (ii) to the best of counsel's knowledge, neither the Issuer nor any 5% holder of stock of the company is currently under investigation by any federal or state regulatory authority for any violation of federal or state securities laws.

This letter with respect to adequate current information may be posted on the OTC Disclosure and News Service for viewing by the general public and OTC Markets Group may rely on said letter 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 letter is not to be relied on by any other party or for any other purposes.

Additionally, the information posted by the Issuer includes all 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 under the Securities Exchange Act of 1934 and complies as to form with the Pink Sheets Guidelines for Providing Adequate Current Information.

Counsel looks forward to making further disclosures to OTC Disclosure and News Service as required or as requested by OTC Markets Group or the Issuer. If you have any questions, please call me at (954) 990-7892.

Very truly yours,



Elsa M. Figueras, Esq.  
E. Figueras & Associates, P.A  
For the Firm