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March 12, 2015

OTC Markets Group, Inc.
304 Hudson Street, 3rd Floor
New York, New York 10013
Re: Gemini Global Group Corp.

Dear Sir or Madam:

I represent Gemini Group Global Corp., (Symbol: GMNI), a Nevada corporation, ("the issuer"), as its legal counsel. My client has requested that I render a legal opinion as to whether there is adequate current information available on the OTC disclosure and News service for the issuer and matters relating to its financials for the period ending including financial reports for the preceding the previous two years. I am not an employee of the issuer.

This letter is meant to apply to the laws of the United States. I am a resident of the United States and licensed to practice in the state court of Tennessee and am also admitted to practice in the U.S. District Court for the District of Tennessee. I am also permitted to practice before the Securities and Exchange Commission ("SEC"), and have not been prohibited from practice thereunder.

I have examined the corporate records, documents and such questions of law that I consider necessary or appropriate for the purposes of rendering this opinion letter. In my review I have met with the company and management whom I believe to be reliable sources. In addition, I have reviewed the definition of "current information" set forth in Rule 144(C) of the Securities Act of 1933 (The "Act"), and the OTC Markets Group's Guidelines for Providing Adequate Current Information. I have reviewed the Issuer's corporate records including the following:

Financial Statements and Annual Report for the year ending December 31, 2013 (posted on March 12, 2015)

Supplemental Information posted December 31, 2014

Financial Statements and Annual Report for the year ending December 31, 2014 (posted on March 12, 2015)

In my review I have relied upon the representations of management and officers of the Issuer and on publicly available information regarding the issuer including financial statements listed above. I have spoken with management and all of the information I requested as a basis for this opinion has been provided to me and I believe the sources of information reviewed are reliable. In addition, I have reviewed the definition of current information set forth in SEC Rule 144 (c) (2) under the act ("Other Public Information") as well as the relevant provisions of Rule 15c2-11 of the Securities Exchange Act of the 1934 (the "Exchange Act"), and the OTC Markets Group's Guidelines for providing Adequate Current Information. In my opinion, the information provided:

(A) Constitutes "adequate public information" concerning the securities and the Issuer and "is available" within the meaning of Rule 144 (c) (2) of the act;

(B) 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 15c2-11under the Exchange Act;

(C) Complies as to form with the OTC Markets Group's Guidelines for Providing Adequate Current Information, which is located at www.otcmarkets.com

(D) Has been posted through the OTC Disclosure and News Service

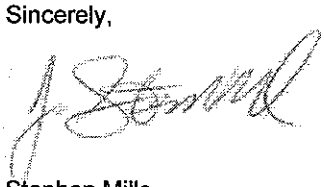
The financial Statement for the Issuer is the responsibility of Christopher Cox, C.E.O. of the Issuer, 5601 Bridge Street, Suite 300, Ft. Worth, Texas. These financial statements have not been audited or are presented as such. They were prepared internally by or under the supervision of President Mr. Christopher Cox, and Controller Mrs. Pat Thomas. Mr. Cox has 5 years executive experience running various businesses and reviewing financial reports. Mrs. Thomas has 18 years experience of corporate accounting experience. Mountaineer Venture Capital has reviewed all the filings prepared by the Company prior to posting to Otcmarkets.com.

The transfer agent for the Issuer is Pacific Stock Transfer. Pacific Stock Transfer is a registered transfer agent with the SEC. They are located at 4045 South Spencer Street, Suite 403, Las Vegas, Nevada 89119. I have requested and received and copy of the shareholders list provided by management and confirmed that the number of shares issued is consistent with the corporate records of the issuer. I have reviewed the disclosure documents for the issuer, and have personally reviewed the information, as amended, published by the Issuer on OTC Markets News Service, and have discussed the information with Management.

I have confirmed with management that management is not aware of any investigation of the Issuer and or any beneficial owner, officer, director or legal counsel of the Issuer by federal or state regulatory authority, including the SEC. After a review of these documents as set forth above, and consultation with management, it is my opinion that the information presently being provided by the Issuer to OTC Markets Disclosure and News Service in the financial reports and disclosure information concerning the Issuer does constitute adequate current public information concerning the Issuer within the meaning of Rule 144(c) (2) of the Act.

OTC Markets, Inc. is entitled to and authorized to rely upon this letter in determining whether the Issuer has made adequate information publicly available within the meaning of Rule 144(c) (2) under the Securities Act of 1933. No person other than OTC Markets, Inc. is entitled to rely on this letter, but full permission is granted to OTC Markets, Inc., to publish this letter through the OTC Disclosure and News Service for viewing by the public and regulators.

Sincerely,



Stephen Mills
Attorney for Gemini Group Global Corp.