Law Office
of
Randall V. Brumbaugh

May 13, 2015

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

Re: Opinion Letter re Adequate Current Information for Beverly Hill Group, Inc. (BHGI)

Dear Sir/Madam:

This office has been retained by Beverly Hills Group, Inc. (the "Company" or the "Issuer") for the sole purpose of rendering an opinion in connection with the adequacy of the Company's public disclosure documents.

This opinion is solely for the information of the OTC Markets Group, Inc. ("OTC Markets"). OTC Markets is entitled to rely on this opinion in determining whether the Issuer has made adequate current information publicly available within the meaning of Rule 144(c)(2) under the Securities Act of 1933, as amended. This opinion is not to be quoted in whole or in part or otherwise referred to, nor is it to be filed with any governmental agency or other person without my prior written consent, except that OTC Markets has full and complete permission and rights to publish this correspondence through the OTC Disclosure and News Service for viewing by the public and regulators.

This correspondence will serve to verify that I am a U. S. resident and citizen and have been retained for the purpose of reviewing the current information supplied by the Issuer and rendering this opinion if I find that the current information meets the statutory requirements.

I am licensed to practice law before the United States Supreme Court, the Ninth Circuit Court of Appeals, the Northern District of California, the Eastern District of California, the Central District of California, the Southern District of California, the United States Tax Court, the Military Court of Appeals and all courts in the State of California. This opinion is limited to the federal laws of the United States of America. I do not express any opinion with respect to the Blue Sky or securities laws of any State or other jurisdiction.

I am permitted to practice before the Securities and Exchange Commission and have not been prohibited from practice thereunder.

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In rendering this limited opinion, I have investigated such matters, examined corporate documents and had such discussions and/or communications with representatives of the Company as I have deemed necessary or appropriate for purposes of providing this opinion. In all such examinations I have assumed that (1) all information contained therein is true and correct, (2) all signatures (both manual and conformed) are genuine, (3) all documents submitted to me as originals were authentic, true and complete, (4) all documents submitted to me as copies were true and complete copies of the originals thereof, (5) each natural person signing any document reviewed by me had the legal capacity and authority to do so, and (6) each conversation I had with any representative or agent of the Company was accurate and truthful in all material respects. Nothing came to my attention during the course of my investigation that led me to conclude that any document provided or made available to me was not genuine or authentic or that assertions made to me by representatives or agents of the Company were not true or were lacking in any material respect.

I have relied on information obtained from public sources, officers, management, agents and/or representatives of the Company, as well as other sources, and I have no reason, based on my information and belief, to reasonably doubt that these sources were not reliable. I know of no facts which would reasonably lead me to conclude that the opinion set forth herein is inaccurate in any material respect.

The Issuer has submitted, and I have reviewed in connection with the preparation of this correspondence, the following information posted to OTC Markets on the dates indicated:

Document	Date Published
Annual Report for the period ending 12/31/14	May 12, 2015
Supplemental Information ending 9/30/14	December 6, 2014
Supplemental Information ending 9/30/14	December 6, 2014
Quarterly Report for the period ending 9/30/14	November 13, 2014
Quarterly Report (restated) for the period ending 6/30/14	October 27, 2014
Quarterly Report (restated) for the period ending 3/31/14	October 27, 2014
Quarterly Report for the period ending 6/30/14	August 14, 2014
Quarterly Report for the period ending 3/31/14	June 9, 2014
Quarterly Report (amended) for the period ending 3/31/14	May 15, 2014
Quarterly Report for the period ending 3/31/14	May 11, 2014
Annual Report for the period ending 12/31/13	April 12, 2014

After reasonable investigation I have no reason to believe that, at the time such information was submitted to OTC Markets, the information contained any untrue statement of material fact or failed to state a material fact necessary in order to make any statement proffered, in light of the circumstances under which it was made, not misleading.

I assume no obligation to update or supplement this opinion letter to reflect any change in fact or law which may hereafter come to my attention.

I have reviewed the information posted by the Issuer and after reasonable investigation I am of the opinion that the information (i) constitutes "adequate current information" concerning the Issuer and is "publicly available" within the meaning of SEC Rule 144(c)(2) under the Securities Act of 1933, as amended; (ii) includes all of the information that a broker-dealer would be required to obtain from the Issuer to publish a quotation for the Issuer's securities under SEC Rule 15c2-11 of the Securities Exchange Act of 1934, as amended; (iii) complies as to form with the OTC Markets Group's Guidelines for Providing Adequate Current Information; and (iv) the Information has been posted through the OTC Disclosure and News Service.

This opinion does not alleviate the professional and personal responsibilities of brokers, dealers and investors to conduct their own professional and personal due diligence. In the event that the facts or information in any document I have reviewed and/or information I have received from the Issuer or any Issuer representative are determined not to be true or lacking in any material fact, this opinion shall be null and void.

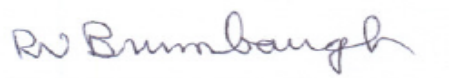
Donna Mikkin, the President and a Director of the Issuer, is responsible for the preparation of the financial statements as well as the entire filing with OTC Markets. Based on my information and belief, Ms. Mikkin has started and developed successful companies. Ms. Mikkin appears well versed in accounting and general financial matters and seems to have sufficient resources to acquire the assistance of any professional she deems necessary.

The Company's transfer agent, Interwest Transfer Company, Inc., 2302 Nash Street, 1981 Murray Holladay Rd., Salt Lake City, UT 84117, is registered with the SEC. I have relied on information provided to me by the Issuer and/or agents of the Issuer to confirm the number of shares outstanding.

I have (i) personally conferred with the Issuer's management and a majority of the directors, (ii) reviewed the information published by the Issuer through the OTC Disclosure and News Service, and (iii) discussed the information with management and a majority of the directors of the Issuer.

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

Respectfully submitted,



Randall V. Brumbaugh

cc: BHGI