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May 14, 2015

OTC MARKETS GROUP
304 Hudson Street Second Floor
New York, NY 10013

RE: *Legal Opinion* concerning Adequate Current Information of Axium Technologies,, Inc. (Symbol – AXGI)

Ladies/Gentlemen:

You are entitled to rely on this letter in determining whether Axium Technologies, Inc. (the "Issuer") has made adequate current information publicly available within the meaning of Rule 144(c)(2) under the Securities Act of 1933.

I am a resident of the United States and have been retained by the Issuer for the purpose of rendering this letter and related matters. This firm's relationship with the Issuer includes, over and above writing this letter, serving as special securities counsel for the Issuer, which duties include preparing or reviewing disclosure information and press releases, interfacing with the chief financial officer and independent accountants, and giving general legal advice to management.

I have examined such corporate records and other documents and such questions of law as I have considered necessary or appropriate for purposes of writing this letter. In all such examinations, I have assumed the genuineness of all signatures, the authenticity of all documents submitted to me as originals, the conformity to original documents of all documents submitted to me as copies and the authenticity of all originals of such documents submitted as copies. Further, in all such examinations, I may have relied on information obtained from public officials, officers of the Issuer, and other sources, and represent that all such sources are believed to be reliable.

This letter relates to the laws of the United States, specifically Federal securities law. I have been a member in good standing of the bar of the State of California since 1970, and am permitted to practice before the Securities and Exchange Commission (the "SEC") and I have not been prohibited from practice thereunder.

The Issuer is not a reporting company and, therefore, does not file annual or other reports with the SEC. I have reviewed publicly available information relating to the Issuer Including: (i) the Issuer's profile posted on the OTC Markets Group's website; (ii) its Annual Company Information and Disclosure Statement for the period ending December 31, 2014,filed with the OTC Markets Group in two parts on February 3, 2015 and February 11, 2015 and its most recent Quarterly Information Disclosure Statement for the period ended March 31, 2015, filed with the OTC Markets Group on May 14, 2015. The Company's financial statements provided in the Information Statements have not been audited.

It is my opinion that the Annual Company Information and Disclosure Statement (i) constitutes adequate current public information concerning the Issuer's securities and it is available within the meaning of Rule 144(c)(2) under the Securities Act of 1933; (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 pursuant to Rule 15c2-11 under the Securities Exchange 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 been posted through the OTC Disclosure and News Service.

The person responsible for the preparation and compilation of the financial statements contained in the Information is David Naylor. David Naylor CPA, CMA is a financial management professional with over twenty years of accounting experience. His career includes professional services as an independent consultant for venture capital organizations, CFO of a mining exploration company, CFO of a producing oil and gas company, and in-house accountant for a large news media publishing company. The unaudited financial statements were prepared in accordance with GAAP.

The Company's transfer agent is Signature Transfer Company, Inc., with a business address of 2632 Coachlight Court, Plano, TX 75093, and is registered with the SEC under the Exchange Act. I have reviewed a copy of the Transaction Journal and tally sheet prepared by the transfer agent for the date ending April 30, 2015 to confirm that the number of outstanding shares set forth in the Annual Information Disclosure Statement is correct.

I have personally met with management and a majority of the directors of the Issuer. I have reviewed the Information published by the Issuer through the OTC Disclosure and News Service. I have discussed the Information with management and a majority of the directors of the Issuer.

To the best of my knowledge, after inquiry of management and the directors of the Issuer, neither, counsel or any officer, director or 5% holder of the securities of the Issuer is currently under investigation by any federal or state regulatory authority for any violation of federal or states securities laws.

No person other than the OTC Markets Group is entitled to rely on this letter. However, I hereby grant the OTC Markets Group full and complete permission and rights to publish the letter through the OTC Disclosure and New Service for viewing by the public and regulators.

I trust this information complies with your request. If you need additional information please contact me.

Very truly yours,

LAW OFFICES OF ROBERT J. HUSTON III



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