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March 31, 2016

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

Re: Advantis Corp
Trading symbol: ADVT

Ladies and Gentlemen:

I have been engaged as special counsel to Advantis Corp, a Wyoming corporation with its executive office located at 6 Hutton Centre Dr, Suite 1000, Santa Ana, CA 92707, ("Issuer"), to provide this letter with respect to the information ("Information") publicly disclosed by the Issuer and published through the OTC Disclosure and News Service, including all information published at http://www.otcmarkets.com/stock/ADVT/profile and related pages. The Issuer's common stock ("Securities") is quoted on OTC Pink Quote and is traded in the over-the-counter market. Please be advised that OTC Markets Group is entitled to rely on this letter in determining whether the Issuer has made adequate current public information publicly available within the meaning of Rule 144(c)(2) under the Securities Act of 1933 ("Securities Act"). It should be noted that Rule 144(c)(2) does not define or provide a standard for public availability of information. In using this term, I refer to any information which is available to the public from any source, including information which requires payment of a fee to a public official. In particular, the Rule does not require publication of information on or through the OTC Disclosure and News Service.

The Information covered by this opinion includes and is limited to information under the Issuer's control on the "Company Profile" page and the items of information indexed on the "Filings and Disclosure" page, as follows:

Information Item	Period End Date/ Publish Date
Annual Report	December 31, 2015/ March 31, 2016

I am a citizen and resident of the United States of America. From time to time, I have provided and expect to provide legal services to the Issuer in the areas of corporate, business transactions and securities law. I now have and have had no relationship with the Issuer, except as set forth above. I am licensed to practice law in New Jersey, Connecticut, and District of Columbia. The subject matter of this letter covers the jurisdictions of the State of Wyoming (the Issuer's jurisdiction of incorporation) specifically limited to

matters under the Wyoming Business Corporation Act and the laws of the United States of America. I have not relied on the work of any other attorney in rendering the opinions set forth below. I am permitted to practice before the U.S. Securities and Exchange Commission and am not prohibited from such practice. For the purpose of this letter, I have reviewed, to the extent I deem relevant to the matters covered by this letter, and relied upon the following:

Documents publicly available -

a. a true copy of the Articles of Incorporation the Issuer and all amendments thereto, being through June 27, 2013;

b. the bylaws of the Issuer (undated, published at http://www.otcmarkets.com/financialReportViewer?symbol=ADVT&id=80511 on May 4, 2012.

c. information published by the Issuer through the OTC Disclosure and News Service on OTCMarkets at the Internet address of http://www.otcmarkets.com/stock/ADVT/ profile and related pages, in particular, the documents listed on the "Filings and Disclosure" page in the active category;

d. a list of all transfer agents registered as of June 2, 2011 with the U.S. Securities and Exchange Commission ("Commission") pursuant to Section 17A of the Securities Exchange Act of 1934, as amended, as provided by the staff of the Commission;

Documents not publicly available -

a. selected proceedings of the Issuer's board of directors approving the appointment of and the agreement dated June 26, 2015 engaging Pacific Stock Transfer Corp. as the Issuer's transfer agent ("Transfer Agent") and replacing prior agreement (if any) with the Transfer Agent;

b. a stockholder position report as of December 31, 2015 dated January 1, 2016 from the Transfer Agent ("Position Report") provided to me by the Issuer. I have also reviewed and relied upon such other documents and certificates of the Issuer and of public officials as I have deemed necessary and relevant to the subject matter this letter. I have assumed the due and proper election or appointment of all persons signing and purporting to sign the documents in their respective capacities, as stated therein, the genuineness of all signatures, the conformity to authentic original documents of the copies of all such documents submitted to me as certified, true, conformed and photocopied, including the quoted, extracted, excerpted and reprocessed text of such documents. As to matters of fact, I have relied on information obtained from public officials, officers of the Issuer and other sources, which I believe to be reliable.

I have also reviewed and am familiar with Rule 144 under the Securities Act and Rule 15c2-11 under the Securities Exchange Act of 1934 (the "Exchange Act"). It should be noted that the only information required by Rule 144(c)(2) that is required to be publicly available is limited to the information identified in paragraphs (a)(5)(i) to (xiv) and (a)(5)(xvi) of Rule 15c2-11. The required information is less extensive than the information identified in OTC Pink Basic Disclosure Guidelines v1.1 dated April 25, 2013. It should be noted that the OTC Markets "Alternative Reporting Standard" is a voluntary,

privately operated system unrelated to the statutory reporting requirements set forth in Sections 13 and 15(d) of the Exchange Act. The Information (i) constitutes "adequate current public information" concerning the Securities and the Issuer and "is available" within my understanding of the meaning of Rule 144(c)(2) 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 15c2-11 (see Appendix "A", hereto), (iii) complies as to form with OTC Pink Basic Disclosure Guidelines v1.1 dated April, 2013, and (iv) has been published through the OTC Disclosure and News Service. I have been advised by the Issuer that John Newton Bowman CPA is responsible for the preparation of the financial statements contained in the Information. Mr. Bowman is a certified public accountant in Florida the financial statements are not audited.

The Transfer Agent's address is Suite 300, 6725 Via Austi Parkway, Las Vegas, NV 89119. According to information obtained from the Commission, the Transfer Agent was registered with the Commission pursuant to Section 17A of the Exchange Act as of June 2, 2011 and I have no reason to believe such registration has been terminated.

The Position Report states that the number of issued and outstanding shares of common stock at the close of business on the date of the Position Report was 788,193,875 shares and Preferred A was 100,000,000 shares. I have (i) personally met with management and one of the two directors of the Issuer, (ii) reviewed the Information published by the Issuer through the OTC Disclosure and News Service and (iii) discussed the Information with management and the director of the Issuer. To the best of my knowledge, after inquiry of management and a majority of the direc- tors of the Issuer, neither of the Issuer, any five percent holder of the Issuer's securities is, nor am I, currently under investigation by any federal or state regulatory authority for any violation of federal or states securities laws.
No person other than OTC Markets is entitled to rely on this letter. Notwithstanding this limitation of reliance, I hereby grant OTC Markets full and complete permission and right to publish this letter through the OTC Disclosure and News Service for viewing by the public and regulatory agencies; provided, that such permission to publish and the publication hereof shall not be deemed a waiver of the limitations of reliance set forth in this paragraph.

Sincerely,

Robert Broderick, Esq

