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"REVISED"
May 6, 2016

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

Re: Legal Opinion, Adequate Current Information, Continuing Disclosure Requirements, SPO GLOBAL, INC., Annual Report ending 12/31/15.

This office has been engaged by **SPO GLOBAL, INC,** a Delaware corporation, (the "Issuer") as its counsel for purposes of providing this opinion.

Counsel is licensed in and a resident of the State of Florida. Counsel is permitted to practice before the Securities and Exchange Commission and has not been prohibited from practice thereunder.

For purposes of this opinion counsel has reviewed the:

1. Issuer's Annual Report, which contains the Issuer's Annual Financial Statements for the period ending December 31, 2015 posted March 31, 2016; and
2. Issuer's Supplemental Information posted February 3, 2016; and
3. Issuer's Supplemental Information – OTC Basic Disclosure for the period ending December 31, 2015, posted January 26, 2016;
3. All such prior disclosures posted by the Issuer with OTC Disclosure and News Service and such other corporate records as were necessary and provided by management for purposes of this letter.

The opinion and conclusions herein are based upon documentation and facts made available by the Issuer and is based on the accuracy of those documents and facts. All such information is believed to be true. In the event that the facts and information in all such documents are determined not to be true, this opinion shall be null and void. Counsel has personally met with the sole member of the Board of Directors and has discussed with the Issuer the Information provided and has received representations from the Issuer, its management and directors as to the accuracy of the information provided for review. This opinion is further based upon those representations.

The corporate offices of the Issuer are located at 800 W Cummings Park, Suite 2000, Woburn, MA 01801. The primary business of the Issuer is ownership (and the acquisition of) software performance optimization companies that own their IP. The Company owns the performance software company Reflective Solutions, Ltd. that sells software and consultancy services in numerous markets.

As of December 31, 2015, the authorized capital of the Issuer was 100,000,000 shares of Common stock $.01 par value; and 2,000,000 preferred shares $.01 par value. As of December 31, 2015, based on the Transfer Agents' Stockholders List of even date, there were 56,001,116 shares of Common stock issued and outstanding. Pursuant to the Company's Representations, as of December 31, 2015, there were (a) 100 shares Series A Convertible Preferred issued a d outstanding.

The Fiscal year end for the Issuer is December 31. Financial Statements of the Issuer are prepared by Weinberg & Baer LLC, an independent accountant, and are not audited. These statements are then reviewed by management prior to filing. The primary officer reviewing and approving the Company's financial statements is Mr. Owen Dukes. Mr. Dukes is the President and CEO of the Company. Mr. Dukes has more than 20 years executive experience in the ownership and operation of both public and private enterprises.

There are no known threatened legal proceeding against the Issuer and there are no known defaults on senior securities other than those disclosed in the posted Issuers Disclosure Statement.

The Transfer Agent for the Issuer is American Stock Transfer and Trust Company, 6201 15th Avenue, Brooklyn, NY 11219. Phone: (800) 937-5449. The agency is registered with the SEC.

In rendering the conclusion expressed below, I advise you that I am a member of the Florida 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.

This opinion letter has been prepared and is to be construed in accordance with the Report on Standards for Florida Opinions dated April 8, 2001, as amended and supplemented, issued by the Business Law Section of The Florida Bar (the "Report"). The Report is incorporated by reference into this opinion letter.

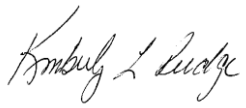
Further to a review of the books and records of the Issuer and discussions with management, counsel is of the opinion that (i) the information provided by the Issuer and posted on the OTC Markets Group web site constitutes "adequate public information" concerning the Securities of the Issuer and is "available" within the meaning of Rule 144(c) (2) of the Securities Act of 1933; and (ii) neither counsel, nor to the best of counsel's knowledge, the Issuer or 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 opinion may be posted on the OTC Disclosure and News service for viewing by the general public and the OTC Markets Group may rely on said opinion 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 opinion letter is not to be relied on by any other party or for any other purposes.

Additionally, counsel is of the opinion that 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 OTC Markets Group's Guidelines for Providing Adequate Current Information.

Counsel looks forward to making further disclosures to OTC Disclosure and News Services as required or as requested by the OTC Markets Group or the Issuer. If you have any questions, please call me at 941.747.5290.

Sincerely,
Kimberly L. Rudge, P.A.



Kimberly L. Rudge