April 10, 2017

OTC Markets Group Inc. 304 Hudson Street, 3rd Floor New York, New York 10013

Attn: Issuer Services

Re: Innovativ Media Group, Inc. (INMG.PK)

Dear OTC Markets Group Inc.:

This letter is delivered to you in order to assist you in determining whether Innovativ Media Group, Inc., a Wyoming corporation (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.

We have acted and currently act as special counsel ("Counsel") for the Issuer for the purpose of issuing this letter and related matters. As such Counsel, we have (i) personally met with management and a majority of the directors of the Issuer, (ii) reviewed the documents, financial statements and related information published on March 7, 2017, by the Issuer through the OTC Disclosure and News Services, hereinafter referred to as the "Information," and (iii) discussed the Information with management and a majority of the directors of the Issuer. All statements set forth herein are (a) based on the accuracy of the written representations made to us by the Issuer, and (b) expressly limited to the existence of such matters as of the date of this letter and shall not in any way constitute statements as to the existence or continuance of such matters at any subsequent date.

In preparing this letter, we have also examined original counterparts or photo static or certified copies of such other instruments, agreements, certificates, records and other documents as we consider necessary as a basis for the statements hereinafter expressed. In rendering this letter, we have assumed, with respect to all documents which we examined: the legal capacity of all natural persons, the genuineness of all signatures thereon, the authenticity of all documents submitted as originals, the conformity to the originals of all documents submitted as copies, and the authenticity of the originals of such copies. As to questions of fact which are material to this letter, we have, where such facts were not otherwise verified or established, relied upon the representations of the Issuer set forth, or otherwise incorporated, in the Information or made directly to us in writing. Unless otherwise defined herein, the terms used in this letter have the meanings ascribed to them in the Information. We believe this Information to have been furnished by reliable sources.

The specific documents reviewed by Counsel for the purpose of this letter are the following, which were posted by the Issuer through the OTC Disclosure and News Service on March 7, 2017:

- 1. The Annual Information and Disclosure Statement for the Issuer dated March 7, 2017.
- 2. The unaudited financial statements with footnotes for the Issuer as of and for the year ending December 31, 2016.

OTC Markets Group Inc.

OTC Markets Group, Inc. April 10, 2017 Page 2 of 3

Counsel is a United States resident admitted and authorized to practice law in the State of California and under the laws of the United States. Counsel is permitted to practice before the Securities and Exchange Commission and has not been prohibited from practice thereunder.

The person responsible for the preparation of the financial statements contained in the Information is Tom Coleman, the Chief Executive Officer and Chief Financial Officer of the Issuer. The financial statements have not been audited by an independent certified public accountant. The Issuer changed management control and its name in June 2015 through the acquisition of all the shares of Innovativ Media Group, Inc., a Washington corporation, resulting in the transfer of assets and entertainment content to the Issuer. This transaction has resulted in a change of focus, with new assets being vended into and managed by the Issuer. Tom Coleman is the new Company Chief Executive Officer. Mr. Coleman is a veteran entertainment executive having served as the sole founder and Chief Executive Officer of the Atlantic Entertainment Group, the co-founder of the RadioTV Network and the Chairman of the Sun Network Group, Inc., as well as a producer or executive producer of over 40 motion pictures.

The Issuer's transfer agent is Action Stock Transfer Corp. To our knowledge, Action Stock Transfer Corp. is registered with the Securities and Exchange Commission. Counsel confirmed the number of outstanding shares set forth in the Information by relying on a representation of Mr. Coleman relating to stock transactions occurring after February 3, 2017, the date of the last shareholders list delivered to the Issuer by the Issuer's transfer agent.

Based upon the foregoing and on the written representations of the Issuer to us, and subject to the qualifications and limitations herein set forth, we hereby state that, to our knowledge:

- 1. The Information (i) constitutes "adequate current public information" concerning the Issuer's securities ("Securities") and the Issuer and "is available" within the meaning of Rule 144(c)(2) under the Securities Act of 1933, as amended, (ii) includes 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, as amended (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.
- 2. To our actual knowledge, after inquiry of management and the directors of the Issuer, neither the Issuer, nor any 5% holder of the Issuer, nor Counsel is currently under investigation by any federal or state regulatory authority for any violation of federal or state securities laws.

This letter is limited by, subject to, and based on the following:

- a. This letter is limited in all respects to the laws of the State of California, including the California Corporations Code, and the federal laws of the United States as set forth online or in published compilations in general use by lawyers in the United States and including any case law, administrative interpretations or other non-statutory law related to those laws.
- b. References herein to our "actual knowledge" refer to the present, conscious and actual knowledge of lawyers in this firm currently engaged in providing services to the Issuer, after a general review of our files.

OTC Markets Group, Inc. April 10, 2017 Page 3 of 3

This letter is for the benefit of OTC Markets Group Inc. and may be relied upon only by it in determining whether the Issuer has made adequate current information publicly available within the meaning of Rule 144(c) under the Securities Act of 1933, as amended. This letter is limited to the matters expressly addressed herein and no other statements are implied or may be inferred. This letter is rendered and speaks only as of the date of this letter. We specifically disclaim any responsibility to advise you of subsequent legal or factual developments affecting this letter that thereafter may come to our attention. This letter is solely for your use in the matter covered by it and is not to be relied upon by any other person or quoted from in whole or in part without the express prior written consent of Counsel, provided, that the OTC Market Group Inc. is hereby granted full and complete permission to publish this letter through the OTC Disclosure and News Service for viewing by the public and regulators.

Very truly yours,

Mark J. Richardson. Esq. of Richardson & Associates

Special Counsel for Innovativ Media Group, Inc.

Tom Coleman, Chief Executive Officer

cc: