

# Mark Alan Siegel

Attorney & Counselor at Law

March 24, 2018

OTC Markets Group Inc.  
Attn: Liz Heese, Managing Director  
Issuer and Information Services  
Second Floor  
304 Hudson Street  
New York, NY 10013

**Re: NuVim, Inc. Common Stock; Trading Symbol: NUVM**

Dear Ms. Hesse,

This letter is submitted for posting with respect to the NUVM Basic Disclosure, the Annual Financial Report, and the Management Discussion & Analysis for the year ended December 31, 2017 (together the "Information") which my client, NuVim, Inc. ("NuVim") has posted through the OTC Disclosure and News Service ("Disclosure Service") on March 24, 2017. OTC Markets Group Inc. ("OTC Markets Group") is entitled to rely on this letter in determining whether NuVim has made adequate current information publicly available within the meaning of Rule 144(c)(2) under the Securities Act of 1933.

I am a U.S. resident. Since February of 2006 I have served as NuVim's General Counsel and Corporate Secretary. They have specifically retained me, as well, for the purpose of rendering this letter. I am not, however, NuVim's employee.

I have reviewed those matters of federal securities law and the rules and guidelines of OTC Markets Group as I have deemed necessary to evaluate the adequacy and currency of the Information. I have examined and am familiar with the Information. I am familiar with and have reviewed NuVim's corporate records. Through this review and examination, I have assumed the genuineness of signatures and the accuracy and conformity to original documents of all copies of documents supplied to me. As to questions of fact material to my conclusion expressed herein, I have relied on information obtained from public officials, NuVim's officers, and other sources, with respect to which I represent that I believe they are reliable.

During the course of my review, I (i) personally met with management and a majority of the directors of the Issuer, (ii) reviewed the Information published by NuVim through the Disclosure Service, and (iii) discussed the Information with management and a majority of NuVim's directors.

I am admitted to practice law in the State of Florida. This opinion does not rely on other counsel's work. I am permitted to practice before the Securities and Exchange Commission (the "SEC"); I have never been prohibited from practice before it.

The only current, publicly available information concerning NuVim and its \$0.00001 par value common stock (Trading Symbol: NUVM) (the "Stock") is the

Information posted on March 24, 2018 with the Disclosure Service. I have carefully reviewed the Information.

It is my opinion that the Information and the Financial Statements (i) constitutes "adequate current public information" concerning NuVim and the Stock and "is available" within 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 under the Securities Exchange Act of 1934 (the "Exchange Act"), (iii) complies as to form with the OTC Markets Group's OTC Pink Disclosure Guidelines, and (iv) has been posted through the Disclosure Service.

NuVim's unaudited quarterly financial statements were prepared by its Chief Financial Officer, Richard Kundrat. Mr. Kundrat has served as NuVim's CFO since 2007. He has over 40 years of management and financial experience.

NuVim's transfer agent is American Stock Transfer & Trust Company, LLC. They are registered with the SEC under the Exchange Act. The Transfer Agent has directly confirmed to me in writing the number of shares of Stock outstanding on all dates referred to in the Information.

To my best knowledge, based on inquiry of NuVim's management and directors, neither NuVim, the issuer of the Stock, any 5% holder of the Stock, nor I are currently under investigation by any federal or state regulatory authority for any violation of federal or states securities laws.

This opinion is limited to the matters stated herein and no other statement, oral or written, made by me, may be relied upon by Pink OTC Markets or NuVim. The information set forth herein is as of the date hereof, and, except in the event I cease to serve NuVim, I disclaim any undertaking to advise you of changes which may hereafter be brought to my attention. This opinion is provided to you as a legal opinion only and not as a guaranty or warranty of the matters discussed herein or in the documents referred to herein. No opinion may be inferred or implied beyond the matters expressly stated herein.

This opinion is being rendered solely for the benefit of NuVim and OTC Markets Group. No other person may rely on this opinion, and no part hereof may be filed with or otherwise furnished to any governmental authority without my prior express written consent. Notwithstanding the foregoing, Pink OTC Markets is hereby granted full and complete permission and rights to publish the letter through the Disclosure Service for viewing by the public and regulators.

Very truly yours,

Mark Alan Siegel

MAS/dt