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May 6, 2015

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

> Re: United Resource Holdings Group, Inc.'s Report Published through the OTC Disclosure and News Service – Year Ended December 31, 2014 and Press Releases Through April 22, 2015

Dear Ladies and Gentlemen:

This opinion letter is written on behalf of our client, United Resource Holdings Group, Inc. (the "Company"). OTC Markets Group, Inc. (the "OTC Markets Group") is entitled to rely on this letter in determining whether the Company has made adequate current information publicly available within the meaning of Rule 144(c)(2) under the Securities Act of 1933, as amended (the "Securities Act"). Michael K. Hair of Michael K. Hair, P.C. (the "Firm"), is a citizen and resident of the U.S. The Firm has been retained by the Company as its securities counsel, which duties include rendering this letter.

We have examined such corporate records and other documents and such questions of law as we considered necessary or appropriate for purposes of rendering this letter. Michael K. Hair is authorized to practice law in the States of Arizona and Colorado and the Federal Courts of United States, is permitted to practice before the SEC and has not been prohibited from practice thereunder. As to matters of fact, the Firm has relied upon information obtained from officers of the Company and other sources. The Firm believes all such sources are reliable.

On May 6, 2015 we reviewed: (i) the Company's Annual Report For the Fiscal Year Ending December 31, 2014 filed on the OTC Disclosure and News Service (the "DNS") by the Company on March 31, 2015 (the "Annual Report"); and (ii) the Press Releases filed on the DNS by the Company on February 25, March 31, and April 22, 2015 (collectively, the "Information"). The Information: (i) constitutes "adequate current public information" concerning and the Company and its securities 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 Company to publish a quotation of the securities under Rule 15(c)2-11 under the Securities Exchange Act of 1934 (the "Exchange Act"); (iii) complies as to form with OTC Markets Group's OTC Pink Disclosure Guidelines, which are located on the internet at www.otcrnarkets.com; and (iv) has been posted on the DNS.

We have reviewed, the financial statements included in the Information, which are unaudited. The financial statements were prepared by Travis G. Capson, the Company's Chief Financial Officer. The qualifications and expertise of Mr. Capson in preparing the Company's financial statements are not set forth in set forth in Item 8 of the Annual Report.

The Company's transfer agent is Columbia Stock Transfer Company located at 1869 E. Seltice Way, Suite 292, Post Falls, Idaho 83854. We have confirmed that this transfer agent has filed its Form TA-2 with the SEC for the 2015 year. The method used to confirm the number of outstanding shares set forth in the Information as of December 31, 2014 by us was a review of the stockholder list furnished by the transfer agent.

We have met with a majority of the Board of Directors of the Company via video and audio conferencing on May 6, 2015 and discussed the Information with them.

To the best of our knowledge, after inquiry of management and the majority of the Directors of the Company, neither the Company, any five percent stockholder of the Company nor any counsel of the Company is currently under investigation by any federal or state regulatory authority for any violation of federal or state securities laws.

The Firm grants OTC Markets Group full and complete permission and right to publish this letter solely on the OTC Disclosure and News Service for viewing by the public and regulators. Notwithstanding such publication, other than OTC Markets Group, no one is entitled to rely on this letter or any statement contained herein.

Very truly yours,

Michae K-Hair, P.

Michael K. Hair, President