

January 5, 2022

OTC Markets Group
330 Vessey Street - 12th Floor
New York, NY 10282

Re: Nugene International, SYMBOL: NUGN - Sufficiency of Adequate Current Information

Ladies and Gentlemen:

Please be advised that I am securities counsel to Nugene International, Inc., a Nevada corporation (the "Issuer"). I have been requested, as securities counsel to the Issuer, to render a sufficiency of adequate current information opinion (this "Opinion") in connection with the filing by the Issuer on January 3, 2022 of an Annual Report for the year ended December 31, 2021 (the "1/3/22 Filing") which included unaudited financial statements and all other documents previously filed on the OTC Markets and with the Securities and Exchange Commission ("SEC") (collectively the "Historical Information"). (The 1/3/22 Filing and the and the Historical Information are sometimes hereinafter referred to collectively as the "Filed Documents").

For the reasons set forth herein, it is my opinion that the Filed Documents, taken together: (i) constitutes adequate current public information concerning the shares of common stock of the Issuer (the "Securities") and the Issuer 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 shares of common stock of the Corporation (the "Securities"), under Rule 15c2-11 of the Exchange Act; (iii) complies as to form with the Pink OTC Markets Inc. Guidelines for Providing Adequate Current Information, which are located on the Internet at www.OTCMarkets.com; and (iv) has been posted in the OTC Markets Group News Service. Please be advised that OTC Markets Group ("OTCMG") is entitled to rely on this Opinion in determining whether the Issuer has made adequate current information publicly available within the meaning of Rule 144(c)(2) under the Securities Act.

In rendering the Opinion, I have reviewed such corporate records and other documents as I have deemed necessary regarding the filing of the Filed Documents. I have worked with Milan I. Hoffman the sole director of the Issuer on many matters over the more a year we have known each other and we have discussed the Company, in terms of both its history and its plans and prospects. In addition, I have made such investigations and have considered such questions of law as I deemed necessary and appropriate for the purposes of rendering this Opinion. In all such examinations, I have assumed the genuineness of all signatures, the authenticity of all documents submitted to me as originals, the conformity to original documents of all documents submitted to me as copies and the authenticity of all originals of such documents submitted as copies. Further, in all such examinations, I may have relied on information obtained from public officials, officers of the Issuer and other sources and represents that all such sources are reasonably believed to be reliable.

The person responsible for the preparation of the unaudited financial statements and notes thereto contained in the Annual Report for the year ended December 31, 2021 was Milan I. Hoffman, the CEO and sole director of the Company. Ms. Hoffman in her capacity as an officer of the Issuer has certified that the financial statements to present fairly, in all material respects, the financial position, results of operations and

cash flows for the periods presented, in conformity with accounting principles generally accepted in the United States of America, consistently applied. In the opinion of management, all adjustments considered necessary for fair presentation have been included in the financial statements. I believe Ms. Hoffman to have sufficient knowledge and understanding of financial and accounting matters to prepare these reports.

The Issuer's transfer agent (the "Transfer Agent") is Olde Monmouth Stock Transfer Co., Inc., 200 Memorial Parkway, Atlantic Highlands, NJ 07716. The telephone number of the transfer agent is (732) 872-2727. The Transfer Agent is registered with the Securities and Exchange Commission. I have communicated with the Transfer Agent and have reviewed a recent certified shareholders list with respect to the shares outstanding.

The documents containing the information concerning the Issuer and the Securities that are publicly available as of the date of this letter are the Filed Documents as defined above.

I have personally reviewed the Filed Documents together with all exhibits and it is my legal opinion that such information taken together comport with all necessary requirements of Rule 144(c)(2) under Securities Act, and that to the best of my knowledge those documents taken together are accurate, up to date, and contain the most current information available on the Issuer, and that an interested investor would find current information therein which could help him objectively determine corporate and financially relevant information better enabling him to make an informed and educated and intelligent decision. I have discussed with management and received management's approval of this Opinion and all filings hereunder. Moreover, to the best of my knowledge, after inquiry of management of the Issuer, neither the Issuer nor its Board of Directors nor any 5% or greater shareholder is currently under investigation by any Federal or state regulatory authority for any violation of federal or state securities laws. Furthermore, after reasonable inquiry, I confirm the ownership information with respect to the Issuer's officers and directors and 5% beneficial owners set forth in the Filed Documents.

I am a resident of the State of New York and admitted to practice law in the State of New York. I have been retained by Issuer as its general securities counsel which includes being retained for the purpose of rendering this Opinion and related matters. My relationship as counsel to the Issuer is as a lawyer serving as securities counsel and as its corporate secretary and in connection therewith I have been retained for the purpose of reviewing the current information provided by the Issuer. I also own 20,000,000 shares of the Issuer's common stock. I have never been prohibited from practicing before the Securities and Exchange Commission. To my knowledge, I am not currently under investigation by any federal or state or foreign regulatory authority and I have never been the subject of any proceeding by the SEC, the U.S. Commodity Futures Trading Commission (CFTC), the Financial Industry Regulatory Authority (FINRA), or any other federal, state, or foreign regulatory agency. I am not now and have never been suspended or barred from practicing in any state or jurisdiction, and have never been charged in a civil or criminal case or been the subject of any investigation related thereto. This opinion is as to the laws of the States of Nevada and New York and the laws of the United States of America.

It appears the Issuer is currently a "shell company" as defined under Rule 405 under the Securities Act.

The opinions set forth herein are expressed as of the date hereof and remain valid so long as the

document, instruments, records and certificates I have examined and relied upon, as noted above, are unchanged and the assumptions I have made, as noted above, are valid. While this opinion is intended exclusively for use by OTC Markets Group, the same is hereby granted full and complete rights and permission without any future request to publish this opinion on www.OTCMarkets.com for viewing by the public and regulatory agencies.

Very truly yours,

A handwritten signature in blue ink, appearing to be 'F. Hariton', is written over the printed name.

Frank J. Hariton