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June 21, 2022

OTC Markets Group, Inc.
300 Vesey Street, 12th
Floor New York, NY
10282

Re: Legal Opinion, Adequate Current Information, Continuing Disclosure Obligations of Advanced Biomedical Technologies, Inc., a Nevada corporation (the "Issuer") for the Annual Report for Period Ending 10/31/2021, and Quarterly Report for the period ending 1/31/2022.

Ladies and Gentlemen:

This office has been engaged by Advanced Biomedical Technologies, Inc., a Nevada corporation, (the "Issuer") as special counsel for matters relating to the Issuer's periodic reports and preparation of this opinion.

This letter covers the laws of the United States and does not depend on another law firm's opinion or letter. The subject matter of this letter covers the jurisdiction of the State of Nevada (the Issuer's state of incorporation) and the laws of the United States. Attorney Andrew J. Befumo (hereinafter referred to as Counsel) is permitted to practice before the Securities and Exchange Commission without prohibition. Counsel is licensed in the District of Columbia and is a resident of the state of Virginia. Counsel is current in his membership requirements for the District of Columbia bar. Counsel is currently not, and has not within the past five years, been the subject of an investigation, hearing, or proceeding by the SEC, the US Commodity Futures Trading Commission, (CFTC), the Financial Industry Regulatory Authority, (FINRA) or any other federal, state, or foreign regulatory agency. Counsel is also currently not, and has not within the past five years, been suspended or barred from practicing in any jurisdiction. He has not been charged in a civil or criminal case. The Issuer's Chief Financial Officer, Mr. Kai Gui, is responsible for the preparation of the Issuer's unaudited financial statements in accordance with GAAP.

Counsel is a third-party service provider for the Issuer. Counsel does not beneficially own any shares of Issuer.

Counsel has been retained by the Issuer for the purpose of reviewing the current information supplied by the Issuer. Counsel has examined such corporate records and other documents and such questions of law as counsel considers necessary or appropriate for the purposes of rendering this letter.

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For purposes of this opinion counsel has reviewed the

1. Articles of Incorporation and Amendments of the Articles of Incorporation of the Issuer,
2. Corporate By-Laws,
3. The Issuer's shareholder list and transfer journal,
4. Financial statements and agreements of the Issuer,
5. Information, as defined below, and
6. Such other corporate records as were necessary and provided by management for purposes of this letter, including past and current financial statements and have examined such corporate records and other documents and such questions of law as counsel considered necessary or appropriate for purposes of rendering the letter.

We have (i) personally met with and interviewed management and a majority of the directors of the Issuer, including Kai Gui, Chiming Yu, Puyi Sheng and Hui Wang; (ii) reviewed the Information, as amended, published by the Issuer through the OTC Disclosure & News Service and (iii) discussed the Information with management and a majority of the directors of the Issuer.

To the best of our knowledge, after inquiry of management, including the Chief Executive Officer and Directors, neither the Issuer, the 5% holders of securities of the Issuer, nor the corporate counsel are currently under investigation by any federal or state regulatory authority for any violation of federal or state securities laws. There are no other family relationships or related party transactions with the Issuer to disclose in its filings or in the Attorney Letter.

The opinion and conclusions herein are based upon documentation and facts made available by the Issuer and are based on the accuracy of those documents and facts. All such information is believed to be true and such sources of information are believed to be reliable. As to matters of fact, Counsel relied on information obtained from public officials, officers of the Issuer and other sources, and believed such information to be true and such sources of information are believed to be reliable.

As to matters of fact, Counsel may rely on information obtained from public officials, officers of the Issuer and other sources, and Counsel believe that these sources were reliable. In rendering this letter, we have examined the following:

1. Corporate records and other documents of the Issuer.

Financial documents including: Consolidated Balance Sheets, Consolidated Statement of Operations and Comprehensive Income, Consolidated Statement of Changes in Shareholder Equity; Consolidated Statement of Cash Flows, and notes to the financial statements for the year ending October 31, 2021; Consolidated Balance Sheet, Consolidated Statement of Operations and Comprehensive Income, Consolidated Statement of Changes in Shareholder

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Equity; Consolidated Statement of Cash Flows, and notes to the financial statements for the year ending October 31, 2020; and Consolidated Balance Sheet, Consolidated Statement of Operations and Comprehensive Income, Consolidated Statement of Changes in Shareholder Equity; Consolidated Statement of Cash Flows, and notes to the financial statements for the quarter ending January 31, 2022 (collectively the “Information”).

2. The financial documents were prepared by Kai Gui, the Issuer’s CFO. Mr. Kai Gui has been working for the Issuer since 2008, and has significant experience in accounting for publicly traded companies. The financial statements for the year ended October 31, 2021 and for the quarter ended January 31, 2021 are unaudited; and the financial statements for the year ended October 31, 2020 are audited.

3. Representations made to us by the officers and directors of the Issuer which we deem as reliable.

4. The Issuer’s transfer agent is: Securities Transfer Corporation, 2901 N Dallas Parkway, Suite 380, Plano, Texas 75093 (the “Transfer Agent”) the Transfer Agent is registered with the Securities and Exchange Commission. Counsel confirmed the number of outstanding shares set forth in the Information by checking against a shareholder’s list provided by the transfer Agent.

5. This letter is governed by and shall be interpreted in accordance with the Legal Opinion Accord (the “Accord”) of the American Bar Association Section of Business Law (1991). Therefore, it is subject to a number of qualifications, exceptions, definitions, limitation on coverage, and other limitations, all as more particularly described in the Accord, and this letter should be read in conjunction therewith. The law relevant to the opinions expressed herein is limited to the laws of the United States of America.

Adequacy of Public Information

Based upon the foregoing and subject to the qualifications hereinafter set forth, we are of the opinion that the Annual Reports of Advanced Biomedical Technologies, Inc., for the Period Ending 10/31/2021 together with the Quarterly Reports for Advanced Biomedical Technologies, Inc., for the Period Ending 1/31/2022:

- (i) constitutes “adequate current public information” concerning the securities of the Issuer and “is publicly available” within the meaning of Rule 144(c)(2) under the Securities Act of 1933;

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(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 Guidelines for Providing Adequate Current Information, which is available at:
<http://www.otcm Markets.com/content/doc/DisclosureGuidelines.pdf>;

(iv) has been posted on the OTC Disclosure and News Service; and

(v) Securities Transfer Corporation is registered under the Securities and Exchange Act of 1934.

(vi) The Issuer is not a shell corporation; however, the Issuer has previously been a shell corporation. Issuer ceased being a shell corporation on January 6, 2009, and has remained a non-shell corporation continuously since that date. Rule 405 of the Securities Act of 1933 and Rule 12b-2 of the Securities Exchange Act of 1934 defines a shell company as a company with 1) no or nominal operations and either 2) no or nominal assets, 3) assets consisting solely of cash and cash equivalents or 4) assets consisting of any amount of cash and cash equivalents and nominal other assets.

(vii) This letter may be relied on by OTC Markets, Inc. but may not be used or relied upon by any other person for any other purpose whatsoever, without in each instance our prior written consent. OTC Markets may publish this letter through OTC Disclosure and News Service for viewing by the public or regulators.

Reliance

This opinion may be posted on the OTC Disclosure and News Service news service for viewing by the general public and OTC Markets Group, Inc. 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. Notwithstanding the foregoing, OTC Markets Group, Inc. is granted full and complete permission and rights to publish this letter through the OTC Disclosure and News Service for viewing by the public and regulators.

In rendering the conclusion expressed below, I advise you that I am a member of the Bar of the District of Columbia 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 and the laws of the State of Nevada, as applicable.

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Counsel looks forward to making further disclosures to OTC Markets Group, Inc. as required or as requested by OTC Markets Group, Inc. or the Issuer. If you have any questions, please call me at (703) 969-2210.

Thank You.

/s/ Andrew J Befumo

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