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December 4, 2017

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

Re: Beyond Commerce, Inc.
Trading symbol: BYOC

Ladies and Gentlemen:

I have been engaged as special counsel to Beyond Commerce, Inc., a Nevada corporation with its executive office located at 3773 Howard Hughes Pkwy, Suite 500, Las Vegas, NV 89169, ("Issuer"), to provide this letter with respect to the information ("Information") publicly disclosed by the Issuer and published through the OTC Disclosure and News Service, including all information published at <http://www.otcmarkets.com/stock/BYOC/profile> and related pages. The Issuer's common stock ("Securities") is quoted on OTC Pink Quote and is traded on the over-the-counter market. Please be advised that OTC Markets Group is entitled to rely on this letter in determining whether the Issuer has made adequate current public information publicly available within the meaning of Rule 144(c)(2) under the Securities Act of 1933 ("Securities Act"). It should be noted that Rule 144(c)(2) does not define or provide a standard for public availability of information. In using this term, I refer to any information which is available to the public from any source, including information which requires payment of a fee to a public official. In particular, the Rule does not require publication of information on or through the OTC Disclosure and News Service.

The Information covered by this opinion includes and is limited to information under the Issuer's control on the "Company Info" page and the items of information indexed on the "Filings" page, as follows:

<u>OTC Information Item</u>	<u>Period End Date</u>	<u>Published Date</u>
<u>Quarterly Report</u> - Unaudited Financials Nine Months Ended September 30, 2017	Sept 30, 2017	Nov 28, 2017
<u>Quarterly Report</u> - Unaudited Financials Six Months Ended June 30, 2017	Jun 30, 2017	Nov 28, 2017
<u>Quarterly Report</u> - Unaudited Financials Three Months Ended March 31, 2017	Mar 31, 2017	Nov 28, 2017
<u>Management Discussion and Analysis</u> - Initial Information Disclosure November 28, 2017	Dec 31, 2016	Nov 28, 2017
<u>Annual Report</u> - Unaudited Financials Twelve Months Ended December 31, 2016	Dec 31, 2016	Nov 28, 2017
<u>Quarterly Report</u> - Unaudited Financials Nine Months Ended September 30, 2016	Sept 30, 2016	Nov 28, 2017
<u>Quarterly Report</u> - Unaudited Financials Six Months Ended June 30, 2016	Jun 30, 2016	Nov 28, 2017
<u>Quarterly Report</u> - Unaudited Financials Three Months Ended March 31, 2016	Mar 31, 2016	Nov 28, 2017
<u>Management Discussion and Analysis</u> - Initial Information Disclosure November 28, 2017	Sept 30, 2015	Nov 28, 2017

<u>Annual Report</u> - Unaudited Financials Twelve Months Ended December 31, 2015	Dec 31, 2015	Nov 28, 2017
<u>Quarterly Report</u> - Unaudited Financials Nine Months Ended September 30, 2015	Sept 30, 2015	Nov 28, 2017
<u>Quarterly Report</u> - Unaudited Financials Six Months Ended June 30, 2015	Jun 30, 2015	Nov 28, 2017
<u>Quarterly Report</u> - Unaudited Financials Three Months Ended March 31, 2015	Mar 31, 2015	Nov 28, 2017
<u>Management Discussion and Analysis</u> - Initial Information Disclosure November 28, 2017	Sept 30, 2017	Nov 28, 2017
<u>Annual Report</u> - Unaudited Financials Twelve Months Ended December 31, 2014	Dec 31, 2014	Nov 28, 2017
<u>Quarterly Report</u> - Unaudited Financials Nine Months Ended September 30, 2014	Dec 31, 2014	Nov 28, 2017
<u>Quarterly Report</u> - Unaudited Financials Six Months Ended June 30, 2014	Dec 31, 2014	Nov 28, 2017
<u>Annual Report</u> - Unaudited Financials Twelve Months Ended December 31, 2013	Dec 31, 2014	Nov 28, 2017
<u>Quarterly Report</u> - Unaudited Financials Three Months Ended March 31, 2014	Dec 31, 2014	Nov 28, 2017

I am a resident of the United States of America. From time to time, I have provided and expect to provide legal services to the Issuer in the areas of corporate, business transactions and securities law. I now have and have had no relationship with the Issuer, except as set forth above. I am licensed to practice law in California. The subject matter of this letter covers the jurisdictions of the State of Nevada (the Issuer's jurisdiction of incorporation) specifically limited to matters under the Nevada Revised Statutes and the laws of the United States of America. I have not relied on the work of any other attorney in rendering the opinions set forth below. I am permitted to practice before the U.S. Securities and Exchange Commission and am not prohibited from such practice.

For the purpose of this letter, I have reviewed, to the extent I deem relevant to the matters covered by this letter, and relied upon the following:

Documents publicly available:

- a true copy of the Articles of Incorporation the Issuer and all amendments thereto, originally filed on January 22, 2007;
- the bylaws of the Issuer dated January 22, 2007.
- information published by the Issuer through the OTC Disclosure and News Service on OTCMarkets at the Internet address of <http://www.otcmarkets.com/stock/BYOC/profile> and related pages, in particular, the documents listed on the "Filings" page in the active category;
 - Company's financial statements for the years ended December 31, 2016 and 2017, including:
 - (A) Unaudited Consolidated Balance Sheets as of December 31, 2016, and December 31, 2015,
 - (B) Unaudited Consolidated Statements of Operations for the years ended December 31, 2016, and December 31, 2015,
 - (C) Unaudited Consolidated Statement of Shareholders Deficit for the years ended December 31, 2016, and December 31, 2015,
 - (D) Unaudited Consolidated Statements of Cash Flows for the years ended December 31, 2016, and December 31, 2015,
 - (E) Notes to Financial Statements; and,

Documents not publicly available:

- a confirmation of the shareholder report as of November 16, 2017 from the Transfer Agent (“Shareholder Report”) provided to me by the Issuer.

I have also reviewed and relied upon such other documents and certificates of the Issuer and of public officials as I have deemed necessary and relevant to the subject matter of this letter. I have assumed the due and proper election or appointment of all persons signing and purporting to sign the documents in their respective capacities, as stated therein, the genuineness of all signatures, the conformity to authentic original documents of the copies of all such documents submitted to me as certified, true, conformed and photocopied, including the quoted, extracted, excerpted and reprocessed text of such documents. As to matters of fact, I have relied on information obtained from public officials, officers of the Issuer and other sources, which I believe to be reliable.

I have also reviewed and am familiar with Rule 144 under the Securities Act and Rule 15c2-11 under the Securities Exchange Act of 1934 (the “Exchange Act”). It should be noted that the only information required by Rule 144(c)(2) that is required to be publicly available is limited to the information identified in paragraphs (a)(5)(i) to (xiv) and (a)(5)(xvi) of Rule 15c2-11. The required information is less extensive than the information identified in OTC Pink Basic Disclosure Guidelines v1.1 dated April 25, 2013. It should be noted that the OTC Markets “Alternative Reporting Standard” is a voluntary, privately operated system unrelated to the statutory reporting requirements set forth in Sections 13 and 15(d) of the Exchange Act.

The Information (i) constitutes “adequate current public information” concerning the Securities and the Issuer and “is available” within my understanding of 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, (iii) complies as to form with OTC Pink Basic Disclosure Guidelines v1.1 dated April 25, 2013, and (iv) has been published through the OTC Disclosure and News Service.

I have been advised by the Issuer that Mark Noffke of SEC Accountants is responsible for the preparation of the financial statements contained in the Annual Report. The financial statements are not audited. Mr. Noffke’s, qualifications to prepare the financial statements stem from him being a Certified Public Accountant and his public company accounting experience. The primary officer reviewing and approving the Company’s financial statements is Mr. George Pursglove the Issuer’s CEO and CFO. Mr. Pursglove has over 35 years’ experience in running businesses of all sizes from start-up’s, public companies and businesses with a national presence.

The Transfer Agent, TranShare Corporation’s address is 15500 Roosevelt Boulevard, Suite 301, Clearwater, FL 33760. The Shareholder Report states that the number of issued and outstanding shares of common stock at the close of business on the date of November 16, 2017 was 1,000,000,000 shares.

The SEC is conducting a fact-finding investigation, into whether, I, or others associated with various publicly traded companies, may have engaged in securities registration violations by participating in filing registration statements which may contain false information about those companies’ control persons or promoters. The SEC’s is also conducting a fact-finding investigation into whether or not, attorney opinion letters were authored that are potentially false and misleading and that may be part of unregistered distributions of securities. The SEC to date, has not concluded that anyone has violated the securities laws.

I have spoken to and confirmed with management and a majority of the directors of the Issuer, via a (i) Video Conference call, (ii) reviewed the Information published by the Issuer through the OTC Disclosure and News Service and (iii) discussed the Information with management and a majority of the directors of the Issuer.

To the best of my knowledge, after inquiry of management and a majority of the directors of the Issuer, neither of the Issuer, any five percent holder of the Issuer’s securities is, are currently under investigation by any federal or state regulatory authority for any violation of federal or states securities laws.

Counsel has relied on information obtained from public officials, officers of the Issuer, and other sources. Counsel has no reason to believe that the records, certificates, or other documents of the Issuer (that I have reviewed) are not accurate, authentic, or reliable. The opinion expressed above is subject to the following assumptions, exceptions and qualifications:

- a. I have assumed that (i) all information in all documents reviewed by us is true and correct, (ii) all signatures on all documents reviewed by myself are genuine, (iii) all documents submitted to myself as originals are true and complete, (iv) all documents submitted to myself as copies are true and complete copies of the originals thereof, and (v) each natural person signing any document reviewed by myself had the legal capacity to do so.
- b. I have made no independent investigation as to the accuracy or completeness of any factual matters contained in the records, documents and certificates that I have reviewed in connection with the foregoing opinion.

No person other than OTC Markets is entitled to rely on this letter. Notwithstanding this limitation of reliance, I hereby grant OTC Markets full and complete permission and right to publish this letter through the OTC Disclosure and News Service for viewing by the public and regulatory agencies; provided, that such permission to publish and the publication hereof shall not be deemed a waiver of the limitations of reliance set forth in this paragraph.

Yours Truly,

/s/Andrew Coldicutt

Andrew Coldicutt