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15 June 2011

Pink OTC Markets, Inc.  
304 Hudson St.  
Second Floor  
New York, NY 10013

**RE: Javalution Coffee Company**  
**Sufficiency of Adequate Current Information**

To Whom It May Concern:

Please be advised that I serve as general and corporate counsel for Javalution Coffee Company, (symbol JCOF.PK), a corporation organized and existing under the laws of the state of Florida (the "Issuer"). I have been requested as counsel to the Issuer to render a sufficiency of adequate current information opinion (the "Opinion") in connection with the filing by the Issuer of an Information and Disclosure Statement (the "Information and Disclosure Statement") pursuant to Rule 15c2-11(a)(5) of the Securities Exchange Act of 1934, as amended, (the "Exchange Act"), and Rule 144(c)2 under the Securities Act of 1933, as amended (the "Securities Act").

This Opinion opines that the information and Disclosures Statement and all other documents filed with Pink Sheets: (i) constitutes adequate current public information concerning the share of common stock of the Issuer (the "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 Issuer to publish a quotation for the shares of common of the Corporation (the "Securities") under Rule 15(c)2-1 of the Exchange Act; (iii) complies as to form with the Pink Sheets Guidelines for Providing Adequate Current Information, Which are located on the Internet at [www.otcmarkets.com](http://www.otcmarkets.com) and (iv) has been posted through March 31, 2011 with a latest release date of May16, 2011 in the OTC **Disclosure and News Service**. Please be advised that Pink OTC Markets Inc. ("Pink Sheets") is entitled to rely on the 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 deemed necessary regarding the filing of the Information and Disclosure Statement. In addition, I have made such investigation 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 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 represent that all such sources are believed to be reliable.

Management is responsible for the preparation of the unaudited financial statements. Management has retained the firm of CFO Oncall Inc. to assist management with the preparation of the unaudited financial statements in conformity with Generally Accepted Accounting Principles. Adam Wasserman, a Florida licensed CPA, is the principal of CFO Oncall Inc. The Financial Statement for the year ended December 31, 2010 is not audited.

The Issuer's Transfer Agent is Fidelity Transfer Company, 8915 South 700 Street, Suite 102, Sandy, Utah 84070. The Transfer Agent is registered with the Securities and Exchange Commission. I have confirmed with the Transfer Agent that as of June 1, 2011 that there are 200,631,358 shares of common stock issued and outstanding.

I have also reviewed the following financial statements and Disclosure Documents:

- Unaudited financial statements for the year ended December 31, 2008
- Unaudited financial statements for the year ended December 31, 2009;
- Unaudited financial statements for the year ended December 31, 2010
- Unaudited financial statements for the year ended March 31, 2011;
- Articles of Incorporation and amendments thereto; and
- Bylaws

I have personally reviewed the Information and Disclosure Statement together with all the exhibits and it is my legal opinion that the Information and Disclosure Statement comports with all necessary requirement of Rule 144(c)(2) under the Securities Act, and that the Information and Disclosure Statement is accurate, up to date, and contains current information regarding the Issuer. I have personally met with management and the majority of the directors of the Issuer to discuss the information posted on [pinksheets.com](http://pinksheets.com). I personally reviewed with management and a majority of the Board of Directors the Information and Disclosure Statement, and reviewed the information provided in the Information and Disclosure Statement, and received management's approval of this Opinion and all filings hereunder.

To the best of my knowledge, after inquiry of management and the members of the Board of Directors 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 violations of federal or state securities laws.

I am a resident of the state of Florida and admitted to practice law in the state of Florida. I have never been prohibited from practicing before the Securities and Exchange Commission.

The opinions set forth herein are expressed as of the date hereof.

The opinions set forth herein cover the laws of the state of Florida and the laws of the United States. This opinion does not rely on the work of other counsel.

While this Opinion is intended exclusively for use by Pink Sheets, the same is hereby granted full and complete rights and permission without any further requests to publish this

Opinion as part of "pinksheets.com" for viewing by the public and regulatory agencies

Sincerely,

IRVING JOSEPH GONZALEZ  
ATTORNEY AT LAW



Irving J. Gonzalez, Esq.

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