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Pink OTC Markets, Inc.  
304 Hudson Street  
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 corporate and securities 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 Initial Company 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 Disclosure Statement and all other documents filed with Pink Sheets: (i) constitutes adequate current public information concerning the shares 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)2-11 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.pinksheets.com](http://www.pinksheets.com); and (iv) has been posted in the Pink Sheets 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 Statements for the period ended September 30, 2009 and the financial statements for the year ended December 31, 2008 are not audited. The financial statements for the years ended December 31, 2007 and 2006 have been audited by Sherb & Co., LLP.

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 November 3, 2009 that there are 99,720,152 shares of common stock issued and outstanding.

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

- Unaudited financial statements for the quarter ended September 30, 2009
- Unaudited financial statements for the year ended December 31, 2008; and
- Audited Financial Statements for the years ended December 31, 2007 and 2006
- Articles of Incorporation and amendments thereto
- 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 requirements 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. 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 and 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. I currently own 275,000 shares of the Issuer's common stock.

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

While this Opinion is intended exclusively for use by Pink Sheets, the same is hereby granted full and complete rights and permission without any future requests to publish this Opinion as part of "pinksheets.com" for viewing by the public and regulatory agencies.

Sincerely



Jeffrey G. Klein