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FXSPACE WORLDWIDE FIN SERVICES LTD
Trust Company Complex
Ajeltake Road, Ajeltake Island
Majuro, Republic of the Marshall Islands, MH 96960

RE: INAPPLICABILITY OF FOREIGN CURRENCY EXCHANGE SERVICE REGULATIONS OF THE MARSHALL ISLANDS

To Whom It May Concern:

This legal opinion letter is issued by Attorney Philip A. Okney, at the request of the above-referenced party, and states as follows:

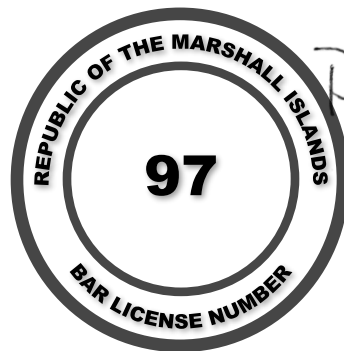
1. I am a duly licensed attorney who is admitted for legal practice in the Republic of the Marshall Islands, and I am qualified to render the legal opinion herein.
2. I have reviewed the following relevant documents presented to me:
 - a. Certificate of Incorporation, FXSPACE WORLDWIDE FIN SERVICES LTD, Reg. No. 103961.
 - b. Articles of Incorporation, FXSPACE WORLDWIDE FIN SERVICES LTD.
 - c. Bylaws, FXSPACE WORLDWIDE FIN SERVICES LTD, As Adopted.
 - d. Consent of Incorporator, FXSPACE WORLDWIDE FIN SERVICES LTD.
 - e. Endorsement Certificate, FXSPACE WORLDWIDE FIN SERVICES LTD, Reg. No. 103961.
3. Based on the foregoing, FXSPACE WORLDWIDE FIN SERVICES LTD, is a duly chartered Marshall Islands non-resident corporation under the Marshall Islands Business Corporation Act, as follows:

Name:	FXSPACE WORLDWIDE FIN SERVICES LTD
Registration Number:	103961
Registered Address:	Trust Company Complex Ajeltake Road, Ajeltake Island Majuro, Marshall Islands MH 96960

4. FXSPACE WORLDWIDE FIN SERVICES LTD does not require a financial license, or any further certification from any Marshall Islands government agency, to engage in foreign currency exchange business, or related business, outside of the geographic boundaries of the Republic of the Marshall Islands.
5. The provisions of the Marshall Islands Banking Act of 1987, relevant to foreign currency exchange services, are inapplicable to the business activities of FXSPACE WORLDWIDE FIN SERVICES LTD outside the geographic boundaries of the Republic of the Marshall Islands.

The statements set forth above are legal opinions rendered only in consideration of the laws and regulations of the Republic of the Marshall Islands. No opinion is rendered herein pertaining to the laws or regulations of any jurisdiction other than the Republic of the Marshall Islands.

Very truly yours,



Philip A. Okney

Philip A. Okney
Attorney at Law