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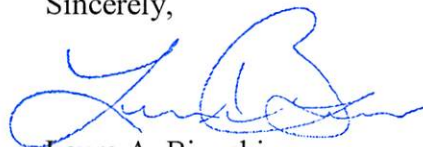
British Columbia Securities Commission

Re: Vapen MJ Ventures Corporation – Final Prospectus dated April 30, 2019

In connection with the final prospectus of Vapen MJ Ventures Corporation (the “**Corporation**”) dated April 30, 2019 (the “**Prospectus**”) relating to the qualification of 1,000,000 units of the Corporation on exercise or deemed exercise of 1,000,000 special warrants in the province of British Columbia, we hereby consent to the use of our firm name under the headings “Compliance with Applicable State Law in the United States” and “Interest of Experts” in the Prospectus and to the references to and use of our Opinion Letter dated February 18, 2019 regarding the corporate structure and business operation of Herbal Wellness Center, Inc. and New Gen Holdings, Inc. therein.

We have read the Prospectus and have no reason to believe that there are any misrepresentations in the information contained in the Prospectus that are derived from our opinions; or that are within our knowledge as a result of services performed by us in connection with such opinions.

Sincerely,



Laura A. Bianchi