

Federal securities laws, such as Rules 10b-5 and 15c2-11 of the Securities Exchange Act of 1934 ("Exchange Act") as well as Rule 144 of the Securities Act of 1933 ("Securities Act"), and state Blue Sky laws, require issuers to provide *adequate current information* to the public markets. With a view to encouraging compliance with these laws, OTC Markets Group has created these OTC Pink Basic Disclosure Guidelines. We use the basic disclosure information provided by OTC Pink companies under these guidelines to designate the appropriate tier in the OTC Pink marketplace: Current, Limited or No Information. OTC Markets Group may require companies with securities designated as Caveat Emptor to make additional disclosures in order to qualify for OTC Pink Current Information tier.

### Qualifications for the OTC Pink - Current Information Tier

Companies that make the information described below publicly available on a timely basis (90 days after fiscal year end for Annual Reports; 45 days after each fiscal quarter end for Quarterly Reports) qualify for the Current Information Tier. Financial reports must be prepared according to U.S. GAAP or IFRS, but are *not required to be audited* to qualify for the OTC Pink Current Information tier.

#### Initial Qualification:

1. Subscribe to the OTC Disclosure & News Service on www.OTCIQ.com to publish your financial reports and material news.
2. Create the following documents, save them in PDF format and upload them via www.OTCIQ.com:
  - Annual Financial statements (Document must include: Balance Sheet, Income Statement, Statement of Cash Flows, Notes to Financial Statements) for the previous two fiscal years. If these reports are audited, please attach the audit letter from the PCAOB registered audit firm. Each year's Annual Financial statements should be posted separately under the report type "Annual Report" in OTCIQ.
  - Any subsequent Quarterly Reports since the most recent Annual Report. This is 2017 ANNUAL REPORT.
  - The most recent fiscal period end report should also include information in accordance with these OTC Pink Basic Disclosure Guidelines; use the fillable form beginning on page 3.
3. If financial reports are not audited by a PCAOB registered audit firm:
  - Submit a signed Attorney Letter Agreement (first two pages of the Attorney Letter Guidelines).
  - After following the appropriate procedures with a qualified attorney, upload an Attorney Letter complying with Attorney Letter Guidelines through your otciq.com account. THE eFUEL EFN COOPERATION POSTING ATTORNEY LETTER WITH THIS 2017 ANNUAL REPORT.

#### Ongoing Qualification:

1. **For each Fiscal Quarter End**, upload a Quarterly Report via www.OTCIQ.com within **45 days** of the quarter end. (A separate quarterly report is not required for 4th quarter.) The ANNUAL REPORT of 2017 should include:
  - Information in accordance with these OTC Pink Basic Disclosure Guidelines -- use the fillable form beginning on page 3.
  - Quarterly financial statements (Balance Sheet, Income Statement, Statement of Cash Flows, Notes to Financial Statements).
  - No Audit Letter or Attorney Letter is required.
2. **For each Fiscal Year End**, upload an Annual Report within **90 days** of the fiscal year end. The Annual Report should include:
  - Information in accordance with these OTC Pink Basic Disclosure Guidelines -- use the fillable form beginning on page 3.
  - Annual financial statements (Balance Sheet, Income Statement, Statement of Cash Flows, Notes to Financial Statements, and Audit Letter, if the financial statements are audited).
3. If financial reports are not audited by a PCAOB registered audit firm, upload an Attorney Letter via www.OTCIQ.com complying with the Attorney Letter Guidelines within **120 days** of the fiscal year end.

## Qualifications for the OTC Pink - Limited Information Tier

Companies that make the information described below publicly available within the prior 6 months qualify for the Limited Information Tier.

1. Subscribe to the [OTC Disclosure & News Service](http://www.OTCIQ.com) on [www.OTCIQ.com](http://www.OTCIQ.com) to publish your financial reports and material news.
2. Create a Quarterly Report or Annual Report for a fiscal period ended within the previous 6 months, save it in PDF format and upload it via [www.OTCIQ.com](http://www.OTCIQ.com). The Quarterly Report or Annual Report includes:
  - Balance Sheet, Income Statement, and Total Number of Issued and Outstanding Shares. Financial statements must be prepared in accordance with US GAAP, but are not required to be audited. (Please note that Cash Flow Statements are not required to qualify for the Limited Information tier; however, unless the financial statements include a Cash Flow Statement, no financial data will be included in the OTC Financials Data Service, which distributes company financial data to online investor portals and makes the data available on your company's Financials tab on [www.otcm Markets.com](http://www.otcm Markets.com))
  - A company in the Limited Information tier, may, but is not required to, include information in accordance with these OTC Pink Basic Disclosure Guidelines using the fillable form beginning on page 3.

## Current Reporting of Material Corporate Events

OTC Markets Group encourages companies to make public disclosure available regarding corporate events that may be material to the issuer and its securities. Persons with knowledge of such events would be considered to be in possession of material nonpublic information and may not buy or sell the issuer's securities until or unless such information is made public. If not included in the issuer's previous public disclosure documents or if any of the following events occur after the publication of such disclosure documents, the issuer shall publicly disclose such events by disseminating a news release within 4 business days following their occurrence, and posting such news release through the OTC Disclosure & News Service.

Material corporate events include:

- Entry or Termination of a Material Definitive Agreement
- Completion of Acquisition or Disposition of Assets, Including but not Limited to mergers
- Creation of a Direct Financial Obligation or an Obligation under an Off-Balance Sheet Arrangement of an Issuer
- Triggering Events That Accelerate or Increase a Direct Financial Obligation or an Obligation under an Off-Balance Sheet Arrangement
- Costs Associated with Exit or Disposal Activities
- Material Impairments
- Sales of Equity Securities
- Material Modification to Rights of Security Holders
- Changes in Issuer's Certifying Accountant
- Non-Reliance on Previously Issued Financial Statements or a Related Audit Report or Completed Interim Review
- Changes in Control of Issuer
- Departure of Directors or Principal Officers; Election of Directors; Mss . VADA MYRVICK, Appointment of Principal Officers.
- APPOINT MR. SLAVOLJUB STEFANOVIC to the Chief Financial officer of eFUEL EFN. CORPORATION
- Amendments to Articles of Incorporation or Bylaws; Change in Fiscal Year
- Amendments to the Issuer's Code of Ethics, or Waiver of a Provision of the Code of Ethics
- Other events the issuer considers to be of importance



OTC Pink Basic Disclosure Guidelines

1) Name of the issuer and its predecessors (if any)  
**eFUEL EFN, CORPORATION**

In answering this item, please also provide any names used by predecessor entities in the past five years and the dates of the name changes.

eFUEL EFN, CORPORATION

2) Address of the issuer's principal executive offices

Company Headquarters

**Address 1: 1212 S. MAIN ST.  
WILDWOOD, FLORIDA 34785 USA  
Phone: 352-399-6278 / 352 504-1300  
Email: [efuelefn@yahoo.com](mailto:efuelefn@yahoo.com)  
Website(s): [www.efuelefncorporation.com](http://www.efuelefncorporation.com)**

IR Contact

**LJUBICA STEFANOVIC  
Address 1: 1212 S. Main Street  
Wildwood, FL 34785  
Phone: 352-399-6278  
Email: [efuelefn@yahoo.com](mailto:efuelefn@yahoo.com)  
Website(s): [www.efuelefncorporation.com](http://www.efuelefncorporation.com) / [www.efuelefn.com](http://www.efuelefn.com)**

3) Security Information

Trading Symbol: EFLN

Exact title and class of securities outstanding:

**COMMON SHARES 2,500,000,000.  
PREFERRED "A" – NONE DILUTABLE SHARES 1,000,000,000  
PREFERRED "B" NONE-DILUTABLE SHARES 35,000,000.**

CUSIP: 28224E209

Par or Stated Company Book Value; \$0.20

Total common shares authorized: 2,500,000,000

Total shares outstanding: 2,459,982,104

Additional class of securities (if necessary):

NONE

Trading Symbol: EFLN

Exact title and class of securities outstanding:

**COMMON SHARES 2,500,000,000  
REFERRED "A" NONE- DILUTABLE SHARES 1,000,000,000  
PREFERRED "B" NONE-DILUTABLE SHARES 35,000,000.**

CUSIP: 28224E209

Par or Stated State Registration Value: .001

Total shares authorized: 2,500,000,000 as of:

Total shares outstanding: 2,460,982,104 as of:

Total flat shares : 1,175,000,000 as of:

Transfer Agent

Name: CLEAR TRUST, LLC  
Address 1: 16540 POINTE VILLAGE DRIVE  
SUITE 2010  
LUTZ, FLORIDA 33558  
Phone: 813-235-4490

Is the Transfer Agent registered under the Exchange Act? Yes: X  No:

\*To be included in the OTC Pink Current Information tier, the transfer agent must be registered under the Exchange Act.

List any restrictions on the transfer of security:

NONE

Describe any trading suspension orders issued by the SEC in the past 12 months.

NONE

List any stock split, stock dividend, recapitalization, merger, acquisition, spin-off, or reorganization either currently anticipated or that occurred within the past 12 months:

NONE

4) Issuance History

List below any events, in chronological order, that resulted in changes in total shares outstanding by the issuer in the past two fiscal years and any interim period. The list shall include all offerings of equity securities, including debt convertible into equity securities, whether private or public, and all shares or any other securities or options to acquire such securities issued for services, describing (1) the securities, (2) the persons or entities to whom such securities were issued and (3) the services provided by such persons or entities. The list shall indicate:

A. The nature of each offering (e.g., Securities Act Rule 504, intrastate, etc.);

esquisition of assets

B. Any jurisdictions where the offering was registered or qualified;  
**State of Florida**

C. The number of shares offered;

None new shares are sold or offered by company since the 2013.

D. The number of shares sold;

**None**

E. The price at which the shares were offered, and the amount actually paid to the issuer;

The shares are exchanged for properties with price by book value \$0.20

F. The trading status of the shares; and

Restricted shares at present time

- G. Whether the certificates or other documents that evidence the shares contain a legend (1) stating that the shares have not been registered under the Securities Act and (2) setting forth or referring to the restrictions on transferability and sale of the shares under the Securities Act.

The shares are not registered under the Securities Act of 1933.

## 5) Financial Statements

Provide the financial statements described below for the most recent fiscal year end or quarter end to maintain qualification for the OTC Pink Current Information tier. For the initial disclosure statement (qualifying for Current Information for the first time) please provide reports for the two previous fiscal years and any interim periods.

- A. Balance sheet; See Exhibit A.
- B. Statement of income; See Exhibit A.
- C. Statement of cash flows; See Exhibit A.
- D. Financial notes; and See Exhibit A.
- E. Audit letter, if audited See Exhibit A.

The financial statements requested pursuant to this item shall be prepared in accordance with US GAAP by persons with sufficient financial skills. **The financial are prepared in accordance with GAAP.**

You may either (i) attach/append the financial statements to this disclosure statement or (ii) post such financial statements through the OTC Disclosure & News Service as a separate report using the appropriate report name for the applicable period end. ("ANNUAL REPORT FOR 2017 ")

or choose to publish the financial reports separately as described in part (ii) above, you must state in the accompanying disclosure statement that such financial statements are incorporated by reference. You may reference the document(s) containing the required financial statements by indicating the document name, period end date, and the date that it was posted to otcq.com in the field below.

### The ANNUAL Report 2017 , posted on OTC Financial Disclosure.

Information contained in a Financial Report is considered current until the due date for the subsequent Financial Report. To remain in the OTC Pink Current Information tier, a company must post its Annual Report within 90 days from its fiscal year-end date and Quarterly Reports within 45 days of its fiscal quarter-end date.

## 6) Describe the Issuer's Business, Products and Services

**The eFUEL EFN CORPORATION is established as a holding company with five business divisions.**

**Describe the issuer's business** so a potential investor can clearly understand the company. In answering this item, please include the following:

- A. a description of the issuer's business operations;

**The company is established as a holding corporation with five business divisions: 1. Solar and wind Energy Division. 2. Real Estate, Agricultural Land Division. 3. Investment Division. 4. Retail, Hospitality Division. 5. Plans and construction Division. The management of this five divisions have vision and goals to advance business operation that will grow in this economy.**

- B. Date and State (or Jurisdiction) of Incorporation:

**State of Florida in the 1997**

- C. the issuer's primary and secondary SIC Codes;



**Primary 7380, Secondary 8999**

D. the issuer's fiscal year end date;

**December 31**

E. principal products or services, and their markets;

**Retail, Hospitality, Markets Florida , California, Georgia and Indiana**

**7) Describe the Issuer's Facilities**

The goal of this section is to provide a potential investor with a clear understanding of all assets, properties or facilities owned, used or leased by the issuer.

In responding to this item, please clearly describe the assets, properties or facilities of the issuer, give the location of the principal plants and other property of the issuer and describe the condition of the properties. If the issuer does not have complete ownership or control of the property (for example, if others also own the property or if there is a mortgage on the property), describe the limitations on the ownership.

If the issuer leases any assets, properties or facilities, clearly describe them as above and the terms of their leases.

1) eFUEL EFN CORPORATION is the owner of the web-sites: www. efuelefncorporation.com  
www.efuelefn.com

2) Commercial Real Estate at 1212 s. Mine St. Wildwood Florida 3785, 3) Native American Jewelry Shop 4. Cherokee Trading Post. Inc. retail business and inventory. 5) Citrus business (orange shop). Retail activities and wholesale. 6) Cherokee Trading Post Cofe ) 7. Commercial property on U.S. 301 and Florida Turnpike, Wildwood, Florida 34785.8) Land in Gorgiea. 9) The billboard signs located on South 301 and Ronald Reagan Turnpike in Florida.10) 2905 ac. Land, gold deposits and minerals in State of California.

**8) Officers, Directors, and Control Persons**

**Mrs. Ljubica Stefanovic, President**  
**MR. Slavoljub Stefanovic, CFO**  
**Mr. Matthew Mmundt, Vice President**  
**Mr.Matthew Mundt , Secretary**

The goal of this section is to provide an investor with a clear understanding of the identity of all the persons or entities that are involved in managing, controlling or advising the operations, business development and disclosure of the issuer, as well as the identity of any significant shareholders.

**Euro-American Finance Network, Inc.**  
**Slavoljub Stefanovic, Marija Stefanovic, Chrstina Stefanovic, Alexsandra Stefanovic**

A. Names of Officers, Directors, and Control Persons. In responding to this item, please provide the names of each of the issuer's executive officers, directors, general partners and control persons (control persons are beneficial owners of more than five percent (5%) of any class of the issuer's equity securities), as of the date of this information statement.

**Mrs. Ljubica Stefanovic, Mr. Matthew Mundt, Mr.Antonio Brbovic, Mr. Lerry Sherman, Dr. Amul Prohit , Mrss. Vada Myrvck. Mr. Slavoljub Stefanovic**

B. Legal/Disciplinary History. Please identify whether any of the foregoing persons have, in the last five years, been the subject of:

1. A conviction in a criminal proceeding or named as a defendant in a pending criminal proceeding (excluding traffic violations and other minor offenses);

None

2. The entry of an order, judgment, or decree, not subsequently reversed, suspended or vacated, by a court of competent jurisdiction that permanently or temporarily enjoined, barred, suspended or otherwise limited such person's involvement in any type of business, securities, commodities, or banking activities;

None

3. A finding or judgment by a court of competent jurisdiction (in a civil action), the Securities and Exchange Commission, the Commodity Futures Trading Commission, or a state securities regulator of a violation of federal or state securities or commodities law, which finding or judgment has not been reversed, suspended, or vacated; or

None

4. The entry of an order by a self-regulatory organization that permanently or temporarily barred suspended or otherwise limited such person's involvement in any type of business or securities activities.

None

Beneficial Shareholders: Provide a list of the name, address and shareholdings or the percentage of shares owned by persons beneficially owning more than ten percent (10%) of any class of the issuer's equity securities. If any of the beneficial shareholders are corporate shareholders, provide the name and address of the person(s) owning or controlling such corporate shareholders and the resident agents of the corporate shareholders.

**Euro-American Finance Network, Inc**  
**Mrs. Alex Munedt CFO**  
**4004 Crimery Rd.**  
**De Pere, WI. 54115 USA.**  
**Beneficially Owning "A" and common shares.**

**Mrs.Ljubica Stefanovic**  
**1212 S. Main St.**  
**Wildwood, Florida 34785 USA.**  
**Beneficially Owning "A" and common shares.**

**Slavoljub Stefanovic**  
**1212 S. Maine Street**  
**Wildwood, Florida 34785 USA.**  
**Beneficially Owning "A" and common shares.**

## 9) Third Party Providers

Please provide the name, address, telephone number, and email address of each of the following outside providers that advise your company on matters relating to operations, business development and disclosure:

### Legal Counsel

Name: **MARK E. PENA , P.A.**  
Firm: **LAW OFFICE OF MARK E PENA, P.A.**  
Address: **4230 SOUTH MACDILL AVE. SUITE 1, TAMPA, FLORIDA 33611 USA.**  
Phone: **813-251-1289 fax. 813-831-1143**  
Email: **ipena001@tampabay.rr.com**

### Accountant or Auditor

Name: **Slavoljub Stefanovic**



Firm: EURO-AMERICAN FINANCE NETWORK, INC.

Address 1: 6624 WOODY CT. LEESBURG, FLORIDA 34748 USA

Phone: 352-504-1300 or 352 -254-0237

Email: slavostefanovic@yahoo.com

**Investor Relations Consultant**

Name: Mrs. MARIJA STEFANOVIC

Firm: EURO-AMERICAN FINANCE NETWORK, INC.

Address 1: 501 E. 4<sup>th</sup> St. Suite 2, Marion , Indiana 46952 USA.

Email: eafninc@yahoo.com or mmakkis@yahoo.com

Other Advisor: Any other advisor(s) that assisted, advised, prepared or provided information with respect to this disclosure statement.

Name: Firm: Mr. Larry Sherman \_\_\_\_\_

Address 1: 1212 S. Main St. Suite B Wildwood ,Florida 34785 USA

Phone: 321-279-3942

Email: Larrysherman@yahoo.com

**10) Issuer Certification**

The issuer shall include certifications by the chief executive officer and chief financial officer of the issuer (or any other persons with different titles, but having the same responsibilities).

The certifications shall follow the format below:

I, Mr. Slavoljub Stefanovic certify that:

1. I have reviewed the ANNUAL REPORT 2017, of eFUEL EFN, CORPORATION;

2. Based on my knowledge, this disclosure statement does not contain any untrue statement of a material fact or omit to state a material fact necessary to make the statements made, in light of the circumstances under which such statements were made, not misleading with respect to the period covered by this disclosure statement; and

3. Based on my knowledge, the financial statements, and other financial information included or incorporated by reference in this disclosure statement, fairly present in all material respects the financial condition, results of operations and cash flows of the issuer as of, and for, the periods presented in this disclosure statement.

JANUARY 8, 2018 [Date]

LJUBICA STEFANOVIC, president

[CFO's Signature]

\_(Digital Signatures should appear as "/s/ [OFFICER NAME]" )

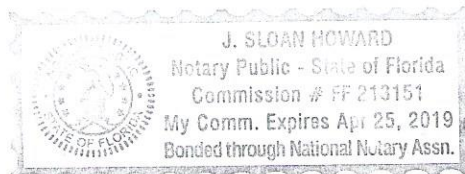
President [Title]

State of Florida / County of Lake

The foregoing instrument was acknowledged before me this 8th day of Jan, 2018 by Ljubica Stefanovic who is (is not) personally known to me or who has produced F-102 as identification & who did (did not) take an oath.

Notary

My Commission Expires





eFUEL EFN, CORPORATION  
1212 S. Main Street Suite B  
Wildwood, FL 34785  
CONSOLIDATED BALANCE SHEETS  
(U.S. Dollars except per share amounts)  
DECEMBER 31, 2017

Cash.....	245,783.64
Short Term investment	65,630.37
	-----
Total Operative Cash	311,414.01

**Assets**

Property: Land, Building .....	15,150,000.00
Land, Minerals and Gold Deposit-----	500,000,000.00
Long Term Investment .....	136,000.00
Inventory .....	2,000,014.50
Citrus and Produce Business .....	350,000.00
Equipment, Machinery, Electronic And Furniture .....	650,000.00
Efuel Treasury Asset .....	400,000.00
Goodwill .....	<u>350,000.00</u>

**Total Assets** 519,347,428.51

**LIABILITY:**

Administrative Liability .....	5,600.00
Advertising .....	00.00
Tax .....	45,400.00
Transfer agent .....	000.00
Payment to mortgage not.....	3,658,,000.00

**TOTAL LIBILTY** 3,709,000.00

**TOTAL STOCKHOLDERS EQUITY** 515,638,428.51

**TOTAL STOCKHOLDERS EQUITY AND LIBILTY** \$519,347,428.51

**AUTHORIZED SHARES**

Preferred "A" Shares.....	1,000,000,000
Preferred "B" Shares .....	35,000,000
Common Shares .....	2,500,000,000

Number of common authorized shares 2,500,000,000. Float or free trading shares 1,175,254.801.Total Restricted outstanding shares 2,460,982,109. And the 39,017,891 are in treasury account at Transfer Agent ..

eFUEL EFN CORPORATION  
1212 S. MAIN ST.  
Wildwood, FL. 34785  
Consolidated Balance Sheet  
2017 Annual Report  
( IN US DOLLARS EXCEPT PER SHARE AMOUNT)

The eFUEL EFN CORPORATION financial report are filed with audited results for the period of twelve months ending December 31. 2017.

The consolidated financial statements display all material aspects of our financial position within eFUEL EFN CORPORATION for period of twelve months as of January 1. to December 31, 2017

At the and of December 31, 2017 we ( company) have Annual reports that has stable balance sheet With cash capital of \$245,783.64 and short term investment of \$65,630.37, total operative capital of \$311,414.01.

Total consolidate assets and liability of company is \$519,347,428.51. The net assets to the shareholders is \$515, 638,428.51, and liability of \$3,709,000.00. The \$500,000,000.00 are in Land, Minerals and Gold deposits.

STRUCTURE OF SHARES:

PREFERRED "A" SHARES-----	1,000,000,000
PREFERRED "B" SHARES-----	35,000,000
COMMON SHARES-----	2,500,000,000

Number of authorized common shares is 2,500,000,000. Floating or free trading shares are 1, 175,254,801. Total outstanding shares 2,460,982,109, and the 39,017,891 are in treasury account with Transfer Agent.

This financial statement is audited by EAFN.,INC.



EFUEL EFN CORPORATION  
 1212 S. MAIN ST. WILDWOOD, FL. 34785  
 CONSOLIDATED INCOME STATEMENT  
 DCE.31, 2017, ANNUAL FINANCIAL REPORT  
 ( IN US DOLLARS EXCEPT PER SHARE AMOUNT)

REVENUE-----	924,902.30
COST OF GOODS -----	348,501.10
NET REVENUE-----	576,401.20
OPERATIVE EXPENSES:	
SALARY/-----	44,000.00
ADVEETISING-----	5,560.00
ATTORNEY AND APPRESEL ON PROPERTY-----	24,850.00
RENT-----	00
TRANSFER AGENT-----	1,500.00
MORTGAGE-----	96,000.00
TELEPHON, FAX,INTERNET-----	3,026.64
TAX-----	27,980.00
MAINTENANCE AND REPAIRS-----	4,680.59
MISCELLANIES REPAIRS -----	141,470.18
TOTAL OPERATIVE EXPENSES-----	359,569.16
NET REVENUE-----	576,401.20
LESS OPERATIVE EXPENSES-----	359,569.16
NET INCOME TO SHERHOLDERS-----	216,832.04

This financial statement is audited by EAFN,INC.

The eFUEL EFN CORPORATION reported and filed audited financial results for the period ending DEC. 31, 2017. At end of the year 2017 company had revenue of \$924,902.30 and net income of \$216,832.04 in cash from the business operation. The company operative expenses is \$359,569.16 It has increased in reference to the hurricane danages.

**EFUEL EFN CORPORATION**  
 1212 S. Main St.  
 Wildwood, FL. 34785  
**2017 Annual Consolidated Cash Flow Statement**  
 In US. Dollars

Cash an hand-bank at beginning of 2017 business operation.....	28,951.60
Net Loss.....	.00
Revenue from beginning of 2017 and sales of merchandise.....	924,902.30
Total Expenses for twelve months.....	708,170.26
Lass Account Payable.....	51,000.00
Account Liability-Long Term Mortgage Not.....	3,658,000.00
Cash used by Operative Expenses.....	359,569.16
Cash on hand or at the bank from Business Activities in 2017 .....	216,832.04
Cash used for Business Activities .....	708,170.26
Outstanding cash on hand and bank -----	245,783.64
Net lose from income statement-----	0000
Net on hand and bank-----	245,783.64

EFUEL EFN COPORATION reported and filed audited financial results for the period ending of DEC 31, 2017.

At beginning of the year 2018 company has \$924,902.30 in revenue from sales in 2017, and 245,783.64 in cash . The funds are used for business activities for twelve months in total operative expenses and investment of \$708,170.26 The outstanding cash on the hand and in bank is \$ 245,783.64.

This financial statement is audited by  
EAFN., INC.



*The Law Office  
Of  
MARK E. PENA, P.A.*

*Attorney and Counselor at Law*

*4230 So. MacDill Ave.*

*Phone: 813-251-1289*

*Memberships/Current Past*

*Suite I  
Tampa, FL 33611*

*Fax: 813-831-1143*

*Florida Bar / America Bar Assoc.  
Federal Middle District of Florida  
11<sup>th</sup> Federal Circuit Court of Appeal*

November 15, 2017

OTC Markets LLC  
304 Hudson St  
3rd Floor  
New York, NY 10013

Re: Attorney Letter with Respect / eFuel EFN Corp., Disclosure Statements

I have been engaged by eFuel EFN Corp, "the company, EFLN or the issuer" (OTC Markets LLC: EFLN), to execute this Attorney Letter with respect to current information, regarding the following disclosure statements: 1) 2015 annual report for period ending December 31, 2015 posted on February 27, 2016. 2) 2016 1<sup>st</sup> quarterly report period ending March 31, 2016 posted on May 2, 2016. 3) 2016 2d quarterly report period ending June 30, 2016 posted on September 27, 2016. 4) 2016 3d quarterly report for period ending September 30, 2016 posted on October 25, 2016. 5) 2016 Annual report for period ending December 31, 2016 posted on January 30, 2017. 6) 2017 1<sup>st</sup> quarterly report for period ending March 31, 2017 posted on April 5, 2017. 7) 2017 2d quarterly report for period ending June 30, 2017 posted on July 5, 2017. 8) 2017 3d quarterly report for period ending September 30, 2017 posted on October 26, 2017.

I have personally reviewed these matters with the management of the Issuer, namely Ljubica Stefanovic, and reviewed the corporate books and records and filings of the company/issuer. Additional documents reviewed include the Articles of Incorporation, proposed disclosure statements, By-Laws, Articles of Amendment, and updated financial statements and notes to financial statements, balance sheet, shareholder list, transfer log and statement of operations. Accordingly, as to matters of fact, I have relied on the disclosures of the issuer, as well as principals involved in and outside of the company.

Regarding the common stock of the Issuer, par value \$.001 (the "Securities"), in the opinion of the undersigned, the Annual Report for the fiscal year ended December 31, 2016 published on the OTC Disclosure and News Service on January 30, 2017, as well as the third quarter report for 2017, posted on October 26, 2017 (i) constitutes "adequate current public information" concerning the Securities of the Issuer 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 Securities under Rule 15c2-11 under the Securities Exchange Act of 1934 (the "Exchange Act"), (iii) complies as to form with the Pink OTC Markets 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 in the OTC Disclosure and News Service. Furthermore, after reasonable investigation I have no reason to believe that such information contained an untrue statement of a material fact or omitted to state a material fact in order to make the statements made, in light of the circumstances under which they were made, not misleading.

The Company's transfer agent is ClearTrust, LLC, which is located at 16540 Pointe Village Drive, Suite 201, Lutz, FL 33558, and is registered with the SEC.

I have reviewed the material contained in the Issuer's unaudited 2016 financial statements and the third quarter financial reports posted October 26, 2017, including the consolidated balance sheets, notes to consolidated financial statements, consolidated statement of operations, consolidated statement of cash flows, summary of significant accounting policies, and ASC 855-10 compliance. All financial statements were internally prepared according to GAAP, with auditing consultation from Euro-American Finance Network, Inc. I have had these financial statements reviewed by a local independent accounting firm specializing in public disclosures, and am convinced the documents were compiled using standard accounting practices. The company's financials as of September 30, 2017, reported assets totaling \$ 519,217,047.93 in value and liabilities totaling \$3,666,000.00. During fiscal 2016 and 2017, the company issued no stock in exchange for services rendered.

Neither the Issuer itself nor any affiliates purchased any of the Issuer's equity securities of any class or type, including warrants, in 2016 or 2017. The Issuer has no outstanding warrants or options at this time. The current President of the company is Ljubica Stefanovic, and Matthew Mundt is the Secretary and a Vice President. The financials and filings were signed off on by Mr. Slavoljub Stefanovic as Chief Financial Officer with consultation from the Board of Directors.

I have independently verified that the company is in fact engaged in the retail sales and hospitality industries. The Issuer is not a development stage company and has reported active operations and revenues for the past 5 years. The Issuer has in the past entered into related party transactions with Euro-American Finance Network Inc., Slavoljub Stefanovic as principle. The Issuer reports 3 beneficial owners, Ljubica Stefanovic, Euro-American Finance Network Inc. and Slavoljub Stefanovic. The company reports no current related party transactions and no conflicts of interests. As of December 31, 2016, the company was indebted to one related party in the aggregate amount of \$2,000,000 related to the purchase of real property.

Based on the company's financial statements and filings, as well as my own investigation, the company has for the past year, and prior, maintained more than nominal operations. Therefore, and according to the issuer's SEC filings, the issuer was not and is not a shell company as defined in Rule 144(i)(1)(i) and footnote 172. Footnote 172 of SEC Release number 33-8869 states, Rule 144(i) does not prohibit the resale of securities under Rule 144 that were not initially issued by a reporting or non-reporting shell company or an issuer that has been at any time previously such a company, even when the issuer is a reporting or non-reporting shell company at the time of the sale. Contrary to commenters' concerns, Rule 144(i)(1)(i) is not intended to capture a "startup company," or, in other words, a company with a limited operating



history, in the definition of a reporting or non-reporting shell company, as we believe that such a company does not meet the condition of having "no or nominal operations."

As of the third quarter, 2017, the issuer reports a total stock authorized of (2,500,000,000) Two Billion Five Hundred Million shares of common stock with 2,460,982,104 issued and outstanding. To my best knowledge and belief, and as reported in the filings, none of the company's management team is under investigation by any federal or state regulatory authority for violation of any state or federal securities laws. Currently, only Euro-American Finance Network Inc. holds in excess of 10% of the company's common stock and it holds almost 100% of the company's preferred stock. In my opinion, the Issuer is not currently engaged in any promotional activities. As of December 31, 2014, the company was no longer on a stock deposit restriction "chill" by the Depository Transfer and Trust Company. There are no restrictions on deposits of the issuers stock into the DTCC system.

Beneficial Owners: EURO-AMERICAN FINANCE NETWORK, INC AND SLAVOLJUB STEFANOVIC'S JOINTLY HOLD 1,000,000,000 SHARES OF PREFERRED STOCK AND 1,600,000,000 SHARES OF COMMON STOCK. LJUBICA STEFANOVIC HOLDS 60,000,000 SHARES OF COMMON STOCK.

Company Directors: Ljubica Staefanovic, Antonio Brbovic, Larry Sherman, Amul Prohit, Vada Myruck, Matthew Mundt and Slavoljub Stefanovic

The following is a list of Directors, officers and consultants that have assisted me and the Issuer with these disclosures, including the amounts of securities of the Issuer owned by each. None have engaged in promotional activities on behalf of the Issuer.

Slavoljub Stafanovic  
Ljubica Stefanovic

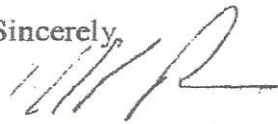
Nothing has come to my attention that would lead me to reasonable believe that anyone is in possession of any material non-public information that would proscribe them from buying or selling the Securities under Rules 10b-5 or 10b5-1 of the Exchange Act. I understand that I am obligated to advise OTC Markets whether the Issuer's disclosure meets the guidelines, which in my opinion, it does, and to advise whether there are any deficiencies, which, in my opinion, there are no deficiencies.

I am a US citizen and a Florida resident and have been retained by the Issuer for this purpose and am not nor ever have been an insider, affiliate, control person, Officer or Director of the Issuer. I have been in the practice of law since 1994, which includes a portion of securities matters, including opinion letters, Regulation D filings and litigation. I have served as a Director and Officer on both Public and private corporations. I am admitted to practice in the State of Florida and the Federal Middle District of Florida. I have never been suspended or proscribed from practicing law by any Bar Association or State panel, nor by the Securities & Exchange Commission, FINRA or any other regulatory or administrative Court, Association or agency. There are no current open investigative files on me with any federal or state securities regulatory

agency or commission. This letter has been prepared and to be construed in accordance with the Report on Standards for Florida Opinions dated April 8, 2008, as amended and supplemented, issued by the Business Law Section of the Florida Bar (the "Report"). The Report is incorporated by reference into this opinion letter.

OTC Markets LLC is entitled to rely on this letter as part of its determination whether the Issuer has made adequate current information available within the meaning of the rule 144(c) (2) under the Securities Act of 1933, and may publish it accordingly. However, no other person, entity, agency or body may rely on any of the assertions or implications made herein, as defined in the Florida Standards For Opinions as revised. If you have any further questions, feel free to contact me directly.

Sincerely,

A handwritten signature in black ink, appearing to read 'M. Pena', written over a horizontal line.

Mark E. Pena, Esq.  
Attorney At Law