CUTLER LAW GROUP

Corporate Securities Law

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October 22, 2015

OTC Markets Group, Inc.
304 Hudson Street, 2nd Floor
New York, New York 10013

Re: International Spirit and Beverage Group, Inc. (f/k/a FIMA, Inc.)

Ladies and Gentlemen:

Our firm, as a U.S. resident, serves as special disclosure and corporate securities counsel to International Spirit and Beverage Group, Inc. (the "Issuer") and have been asked to render this opinion with respect to the adequacy of the current information contained in the Issuer's disclosure statement ("Disclosure Statement") posted on the OTC Disclosure & News Service on the 6th day of April, 2015 and condensed financial statements for the year ended December 31, 2014 posted on the OTC Disclosure & News Service (collectively, the "Disclosures"). We have been asked to express our opinion as to the adequacy of the Disclosures within the meaning of Rule 144(c)(2) promulgated under the Securities Act of 1933 ("Act").

OTC Markets Group, Inc. ("OTC Markets") may rely on this opinion in determining whether the Issuer has made adequate current information publicly available within the meaning of Rule 144(c)(2) of the Act and, more specifically, paragraphs (a)(5)(i) to (xiv), inclusive, and paragraph (a)(5)(xvi) of Rule 15c2-11.

We have examined such corporate records and other documents and such questions of law as we have deemed necessary or appropriate for purposes of rendering this opinion. As to matters of fact, we have made such inquiries of the Issuer's officers as we deemed necessary to render this opinion, and we believe that such sources were reliable.

The person responsible for the preparation of the unaudited condensed financial statements is Todd Peterson, a licensed certified public accountant in the State of Nevada.

The Issuer's transfer agent is Nevada Agency and Transfer Company ("Transfer Agent"). The Transfer Agent is registered with the SEC as such under the Securities Exchange Act ("Exchange Act"). By examination of the Disclosures that include condensed financial statements for the year ended December 31, 2014, we have determined the number of outstanding shares of the Issuer to be as set forth in the Disclosures with information provided by the Transfer Agent and Terry Williams, Chief Executive Officer of the Issuer.

The undersigned attorney has (a) personally met with management and a majority of the directors of the Issuer, (b) reviewed the OTC Pink Basic Disclosure Report as of December 31, 2014 posted by the Issuer on the OTC Disclosure & News Service, and (c) discussed the Disclosure Statement with a majority of the directors of the Issuer.

To our knowledge, after inquiry of management and a majority of the directors of the Issuer, the Issuer, no holder of five percent (5%) or more of its securities, nor the Issuer's counsel is currently under investigation by any federal or state regulatory authority for any violation of federal or state securities laws.

As a result of the foregoing, we are of the opinion that:

1. The Disclosures constitute "adequate current public information" concerning the Issuer's securities and the Issuer within the meaning of Rule 144(c)(2).

2. The Disclosures are "available" within the meaning of Rule 144(c)(2).

3. The Disclosures include all of the information that a broker-dealer would be required to obtain from the Issuer to publish a quotation for the Issuer's securities under Rule 15c2-11 under the Exchange Act.

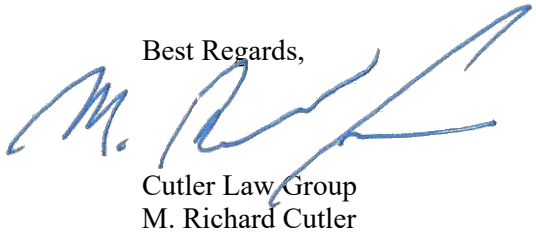
4. The Disclosures comply as to form with OTC Markets' Guidelines for Providing Adequate Current Disclosure Statement.

5. The Disclosures have been posted through the OTC Disclosure & News Service. The undersigned attorney is admitted to practice law in the State of Texas, and this opinion is limited solely to the laws of the United States of America. The undersigned attorney is permitted to practice before the Securities and Exchange Commission ("SEC") and has not been prohibited from such practice.

The opinions set forth herein are expressed as of the date hereof and remain valid so long as the documents, instruments, records and certificates I have examined and relied upon as noted above, are unchanged and the assumptions I have made, as noted above, are valid.

This opinion is rendered solely to OTC Markets and no person other than OTC Markets is entitled to rely upon it. However, we grant OTC Markets full and complete permission and rights to publish this opinion through the OTC Disclosure & News Service for viewing by the public and regulators.

Best Regards,



Cutler Law Group
M. Richard Cutler