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May 2, 2016

OTC Markets Group
304 Hudson Street
Second Floor
New York NY 10013

Re: TransGlobal Assets, Inc. (f/k/a Timeshare Holdings, Inc.)

Gentlemen:

I am counsel to TransGlobal Assets, Inc. (f/k/a Timeshare Holdings, Inc.) (Hereinafter the "Company"or the "Issuer"):

OTC Markets Group is entitled to rely on this letter in determining whether the Issuer has made adequate current information publicly available within the meaning of Rule 144(c)(2) under the Securities Act of 1933, as amended (the "Securities Act").

I am a United States resident, and have been retained by the Issuer as counsel, including but not limited to the rendering of this letter and other related business and securities matters. I have examined such corporate records and other documents and considered such questions of law as I deem necessary or appropriate for purposes of rendering this letter.

I am authorized to practice law in the State of New York. The opinions expressed herein are limited to matters concerning the laws of the State of New York and the federal laws of the United States. I express no opinion as to the laws of any other jurisdiction. This letter does not rely on the work of other counsel.

I am permitted to practice before the Securities and Exchange Commission and have not been prohibited or disbarred from practice, in any respect, before that agency. In connection with this letter, I have (i) investigated the questions of aw;(ii) examined originals or certified, conformed or reproduction copies of documents, and other such agreements, instruments and records of the Issuer, such certificates of public record and such other documents; and (iii) received such information from officers and

representatives of the Issuer as I deemed necessary or appropriate for the purposes of this letter. In all such examinations I have assumed the legal capacity of all natural persons, the genuineness of all signatures, the authenticity of original and certified documents submitted to me and the conformity to original documents of all copies submitted to me as conformed or reproduction copies. As to various questions of fact relevant to the opinions expressed herein, I have relied upon, and assume the accuracy of, representations and warranties contained in the documents and certificates and oral or written statements and other information of or from officers and representatives of the Issuer and others.

In the preparation of this letter I have reviewed the following filings that were made through the OTC Disclosure & News Service:

1. A. The Annual report for the year ended December 31, 2015 filed on May 2, 2016
   B. The Quarterly Report for the quarter ended September 30, 2015, filed November 10, 2015.
   C. The corporate documents and officer and director disclosures filed August 24, 2014
   D. The Quarterly report for the quarter ended June30, 2015 filed August 10, 2015.
   E. The Quarterly report for the period ended March31, 2015 filed May 5, 2015
   F. The Annual report for the year endedDecember31, 2014 filed January 30, 2015.
   G. The Quarterly report for the quarter ended September 30, 2014 filed October 13, 2014,
   H. The Quarterly report for the period ended June 30, 2014 filed August 14, 2014.
   I. The amended Quarterly report for the period ended March 31, 2014 filed May 10, 2014.
   J. The amended Annual report for the period ended December 31, 2013.
   K. The original Quarterly report for the period ended March 31, 2014 filed April29, 2014
   L. The original Annual report for the period ended December 31, 2013 filed February 13, 2014.

In addition to the foregoing, I reviewed the Company's supplemental disclosures as posted from time to time on OTC Markets.

In my opinion, as of the date of this letter, the Information referred to above (i) constitutes "adequate current public information" concerning the securities of the Issuer (the "Securities") and "is available" within the meaning of Rule 144(c)(2) of the Securities Act, (ii) includes all information that a broker-dealer would be required to obtain from the Issuer to publish a quotation for the securities under Rule l 5c2-1l under the Securities Exchange Act of 1934 (the "Exchange Act"), (iii) complies as to form with the OTC Markets Group Guidelines for Providing Adequate Public Current Information.

The person responsible for preparation of the unaudited financial statements contained in the Information is Mr. Doug Johnson Chief Financial Officer of the Company. Mr. John son studied accounting at San Jose College while he was employed by Western Electric. At Western Electric, Mr. Johnson first served as the company's lead auditor. He was then promoted to Accounting Manager over Budgets. He then was promoted to Accounting Manager for the Portland, Oregon Area. After that he served as Western Electric's Accounting Manager for the Western Region.

The Issuer's transfer agent is Transfer On-line, 512 SE Salmon Street, Second Floor, Portland, OR 97214-3444.Transfer On-lines Telephone number is 503-227-2950 The Issuer's transfer agent is registered with the Securities and Exchange Commission. I have confirmed the number of outstanding shares set forth in the Information by reviewing the most recent shareholder listing from the transfer agent. The number of outstanding shares of common stock as of December 31, 2015 was 212,874,719.

I have (i) personally met with management of the Issuer and the directors of the Company, (ii) reviewed the Information published by the Issuer through the OTC Disclosure & News Service, and (iii) discussed the Information with management and the Directors of the Issuer.

To the best of my knowledge, after inquiry of management and the directors of the Issuer, neither the Issuer, any 5% holder of the securities in the Issuer, nor any members of my firm are currently under investigation by any federal or state regulatory authority for any violation of federal or state securities laws.

The opinions expressed herein are solely for the benefit of the OTC Markets Group, which is entitled to reply upon this letter, and may not be relied on in any manner of for any purpose by any other person or entity and may not be quoted in whole or in part without my prior written consent. I hereby grant OTC Markets Group full and complete permission and rights to publish this letter through OTC Disclosure and News Service

for viewing by the public and regulators.

Holders of five percent or more of the outstanding shares of common stock of the Issuer are Kent A. Strickler, Douglas R. Johnson, Paul K. Thompson, and Patricia A. Johnson.

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The opinions expressed herein are given as of the date hereof, and I undertake no obligation to supplement this letter if any applicable laws change after the date hereof or if I become aware of any facts that might change the opinions expressed herein after the date hereof or for any other reason.

Very truly yours,



Simon Kogan