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February 9, 2019

OTC Markets Group, Inc.
304 Hudson Street, 3rd Floor
New York, NY 10013

RE: Suntex Enterprises, Inc. (the "Issuer")

Dear Sir or Madam:

I represent Suntex Enterprises, Inc., (Symbol: SNTX)), a Nevada corporation (the "Issuer") as its legal counsel. My client has requested that I render a legal opinion as to whether there is adequate current information available on the OTC Disclosure and News Service for the Issuer and related matters relative to its Quarterly Reports for the periods ended March 31, 2018, June 30, 2018 and September 30, 2018. I am not a employee of the Issuer.

This letter is meant to apply to the laws of the United States. I am a resident of the United States and licensed to practice in the state courts of Oregon and Washington and am also admitted to practice in the U.S. District Court for the District of Oregon and in the U.S. Tax Court. I am also permitted to practice before the Securities and Exchange Commission ("SEC"), and have not been prohibited from practice thereunder.

I have examined the corporate records, documents and such questions of law that I consider necessary or appropriate for purposes of rendering this Opinion Letter. In my review I have met with the Board of Directors and management of the Issuer and have relied upon the representations of management and officers whom I believe to be reliable sources. In addition, I have reviewed the definition of "current information" set forth in Rule 144(c) of the Securities Act of 1933 (the "Act"), and the OTC Markets Group's Guidelines for Providing Adequate Current Information. I have reviewed the Issuer's corporate records including the following:

- Quarterly Report for the period ended March 31, 2016 (posted September 29, 2017)
- Quarterly Report for the period ended June 30, 2016 (posted September 29, 2017)
- Quarterly Report for the period ended September 30, 2016 (posted September 29, 2017)
- Financial Statements and Annual Report for the year ended December 31, 2016 (posted September 29, 2017)
- Quarterly Report for the period ended March 31, 2017 (posted September 29, 2017)
- Quarterly Report for the period ended June 30, 2017 (posted September 29, 2017)

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- Quarterly Report for the period ended September 30, 2017 (posted November 16, 2017)
- Financial Statements and Annual Report for the year ended December 31, 2017 (posted March 29, 2018)
- Quarterly Report for the period ended March 31, 2018 (posted June 13, 2018)
- Quarterly Report for the period ended June 30, 2018 (posted October 15, 2018)
- Quarterly Report for the period ended September 30, 2018 (posted November 27, 2018)
- Quarterly Report - Revised, for the period ended September 30, 2018 (posted February 5, 2019)

In my review I have relied upon the representations of management and officers of the Issuer and on publicly available information regarding the Issuer including financial statements listed above.

I have spoken with management and all of the information I requested as a basis for this opinion has been provided to me and I believe the sources of information reviewed are reliable. In addition, I have reviewed the definition of current information set forth in SEC Rule 144(c)(2) under the Act ("Other Public Information") as well as the relevant provisions of Rule 15c2-11 of the Securities Exchange Act of 1934 (the "Exchange Act"), and the OTC Markets Group's Guidelines for Providing Adequate Current Information. In my opinion, the information provided:

(A) constitutes "adequate public information" concerning the Securities and the Issuer and "is available" within the meaning of Rule 144(c)(2) of the Act;

(B) 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 Exchange Act;

(C) complies as to form with the OTC Markets Group's Guidelines for Providing Adequate Current Information, which is located at:

www.otcmarkets.com

and

(D) has been posted through the OTC Disclosure and News Service.

The financial statements for the Issuer for quarters ended March 31, 2018 and June 30, 2018 were the responsibility of Jim Anderson, the president of the Issuer until his resignation on August 7, 2018. His address was 7380 Southeastern Avenue, Suite 124, Las Vegas, Nevada. On August 7, 2018, Lawrence L. Twombly became CEO and president of the Issuer and assumed responsibility for completion of the financial statements of the Issuer for the periods ended June 30, 2018, September 30, 2018 and thereafter. Mr. Twombly's corporate address is 7380 Southeastern Avenue, Suite 124, Las Vegas, Nevada. These financial statements have not been audited or presented as such. They were prepared internally by or under the supervision of Mr.

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Anderson, with respect to the quarters ended March 31, 2018 and June 30, 2018, and by Mr. Twombly with respect to the quarter ended September 30, 2018. Mr. Anderson has extensive experience managing public companies and other business interests and is well qualified by experience to prepare these financial statements with assistance from outside accountants when needed. Mr. Twombly also has extensive experience managing public companies and other business interests and is also well qualified by experience to prepare these financial statements with assistance from outside accountants when needed.

The transfer agent for the Issuer is Madison Stock Transfer, Inc., 2715 Coney Island Avenue, 2nd Floor, Brooklyn, New York 11235. The transfer agent is registered with the SEC. I have requested and obtained a copy of the shareholders' list provided to me by management and have confirmed that the number of shares issued is consistent with the corporate records of the Issuer. I have reviewed the disclosure documents currently published on otcmarkets.com for this Issuer, and have personally reviewed the information, as amended, published by the Issuer on OTC Markets News Service, and have discussed the information with management.

Promotional Activity:

In November, 2018, the Issuer, after the appointment of its new management, hired interactiveOffers.com to conduct an awareness campaign for the Issuer's stock and beverage products. In the judgment of the new management, it was believed that an awareness campaign would be beneficial in light of the change of management along with the Issuer's new line of products. The Issuer further believes that the paid hiring of InteractiveOffers.com included full disclosures of that hiring. Upon learning of OTC Market's Caveat Emptor designation of the Issuer's stock, the Issuer stopped that campaign.

On November 27, 2018, the Issuer filed its Disclosure Report for the period ended September 30, 2018. This Disclosure Report was prepared by Lawrence L. Twombly, CEO of the Company, 7380 South Eastern Avenue, Suite 124, Las Vegas, Nevada 89123. No other party assisted, prepared or provided information with respect to the Issuer's Disclosure Report. Mr. Twombly is also the only control person with regard to the Issuer's stock. Mr. Twombly did not receive securities of the Issuer as compensation for his completion of the Disclosure Report nor did any other party receive securities of the Issuer in connection with completion of the Disclosure Report.

The promotional activity noted above, was engaged in by InteractiveOffers.com, 4181 NW 1st Avenue, Suite 6, Boca Raton, Florida 33441. Neither Interactiveoffers.com nor any other party received any stock as compensation pertaining to said awareness campaign. The expense will be reflected in the Issuer's upcoming year-end financial statements and Disclosure Report.

I have made specific inquiry of Mr. Twombly and Interactiveoffers.com and, based upon such inquiries and other information available to me, any sales of the Issuer's securities by insiders within the twelve month period prior to the this opinion have been made in compliance with Rule 144, including, without limitation, any required filings of Form 144, and nothing has come to my attention indicating that any of the insiders is in possession of any material non-public information regarding the Issuer or the securities that would prohibit any of them from buying or selling the securities under Rules 10b-5 or 105-1 under the Exchange

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Act.

I have confirmed with management that management is not aware of any investigation of the Issuer or of any beneficial owner, officer, director or legal counsel of the Issuer by any federal or state regulatory authority, including the SEC. After a review of documents as set forth above, and consultation with management, it is my opinion that the information presently being provided by the Issuer to OTC Markets Disclosure and News Service in the Financial Reports and Disclosure Information constitutes adequate current public information concerning the Issuer within the meaning of Rule 144(c)(2) of the Act.

OTC Markets, Inc., is entitled and authorized to rely upon this letter in determining whether the Issuer has made adequate information publicly available within the meaning of Rule 144(c)(2) under the Securities Act of 1933. No person other than OTC Markets, Inc., is entitled to rely on this letter, but full permission is granted to OTC Markets, Inc., to publish this letter through the OTC Disclosure and News Service for viewing by the public and regulators.

Sincerely,



Vic Devlaeminck
Attorney for Suntex Enterprises, Inc.
VD/wp