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ELECTRONICALLY FILED

May 23, 2019

OTC Markets Group, Inc.
304 Hudson Street, 3rd Floor
New York, New York 10013-1015

Re: Golden Holdings Group (‘GLHD’).

Ladies/Gentlemen:

I have been asked by Golden Holdings Group (the “Issuer”) to provide OTC Markets Group, Inc. (“OTC Markets Group”) a letter with respect to the information publicly disclosed by the Issuer and published through the OTC Disclosure & News Service. I understand that this letter will be posted by the Issuer, and will be published, accompanying the Issuer’s disclosure, in the OTC Disclosure & News Service. OTC Markets Group is entitled to rely on such 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.

I am a United States resident and have been retained by the Issuer for the purpose of rendering this letter and related matters. I am serving as regular disclosure counsel for the Issuer and have been retained also for the purpose of reviewing the current information supplied by the Issuer. I have examined such corporate records and other documents and such questions of law, as I have considered necessary or appropriate for purposes of rendering this letter.

I own 35,000,000 (48.61%) of the shares of common stock of the Issuer, all of which are restricted and which were issued on April 22, 2018 for legal services. I also hold a certificate for 3,776,000 shares from the former control person which I have not transferred into my name. Including those shares I own 54.6% of the Corporation’s common stock. There are no agreements to pay for future legal services in the securities of the Issuer.

I am licensed to practice law in the States of New York and New Jersey. I am allowed to practice before the Securities and Exchange Commission (the “SEC”) and have never been prohibited from practicing before the SEC and can opine on matters under the laws of the United States. As to matters of fact, I have relied on information obtained from public officials, officers of the Issuer and other sources. All such sources are believed to be reliable.

On May 23, 2019, I reviewed the unaudited financial statements that were posted by the Issuer and publicly available through OTC Disclosure and News Service in connection with the year ended December 31, 2018 (the “Information”). These statements were prepared by JDDACPA, LLC, located at 3131 Piedmont Ave, Suite 203, Atlanta, Ga. 30305. The principal of this firm, John Della Donna, CPA, has more than twenty years of experience in the preparation of financial statements. The Information was posted in connection with the ongoing reporting obligation with the

OTC Disclosure & News Service. This letter is submitted in connection with the performance of that obligation.

The Information (i) constitutes "adequate current public information" concerning the securities and the Issuer and "is available" within the meaning of Rule 144(c)(2) under the Securities Act of 1933, as amended, (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 of the Securities Exchange Act of 1934, as amended, (iii) complies as to form with the OTC Markets Group's OTC Pink Sheet Disclosure Guidelines, which are located on the Internet at www.otcmarkets.com, and (iv) has been posted through the OTC Disclosure and News Service.

The Issuer's transfer agent is Globex Transfer L.L.C., 780 Deltona Blvd, Suite 202, Deltona, Florida 32725 (the "Agent"). The Agent is registered with the Securities and Exchange Commission. The Agent confirmed to me by emailing a shareholders' list for the Company on January 8, 2019, setting forth the number of issued and outstanding shares of common stock of the Issuer as at December 31, 2018 (71,000,000 shares plus an additional 1,000,000 committed for issuance for the acquisition of Your Active World Holdings, Inc.). I also have (i) personally met with management and a majority of the directors of the Issuer addressed in this Report Period ending December 31, 2018, i.e. John Bambach, the Company's sole officer and director, (ii) reviewed the information published by the Issuer on the OTC Disclosure & News Service and (iii) discussed the information with management and a majority of the directors of the Issuer as at December 31, 2018.

To the best of my knowledge, after inquiry of management and the director of the Issuer, neither the Issuer of the securities, any 5% holder, or any counsel is currently under investigation by any federal or state regulatory authority for any violation of Federal or state securities laws, except that the author of this Letter, Roger L. Fidler, a 5% owner and legal counsel to the Issuer, has been subpoenaed in the matter of In re Interactive Brokers(09876) to provide documents and testimony unrelated to the Issuer.

The issuer is not now a "shell company" as defined in Rule 405 of the Securities Act, but it must be assumed to have been a shell company in the past since counsel has been unable to confirm that it was not such a "shell company." More specifically, the issuer had a shrimp aquaculture business in Indonesia that as far as counsel has been able to determine ceased operations. While that business may have assets, counsel has been unable to determine that fact nor the value of any such assets, if they exist, and the issuer does not claim ownership of those assets, nor of the business as of December 31, 2018.

No person other than OTC Markets Group is entitled to rely on this letter; however, OTC Markets Group has permission to publish this letter through the OTC Disclosure & News Service for viewing by the public and regulators. As of this date, there have been no promotional activities regarding the securities covered hereby.

Sincerely,

/s/ Roger L. Fidler
Roger L. Fidler