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VIA OCTIQ.COM UPLOAD ONLY

September 20, 2019

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

Re: Attorney Letter Regarding Current Public Information
Metrospaces, Inc. (OTC Pink: MSPC)

Ladies and Gentlemen:

Please be advised that we have been retained by Metrospaces, Inc., a Delaware corporation (the "Issuer"), for the purpose of rendering this opinion letter to you and for other corporate matters. In connection therewith, OTC Markets Group Inc. ("OTC Markets Group") is entitled to rely on the contents hereof in determining whether the Issuer has made adequate current information publicly available within the meaning of Rule 144(c)(2) promulgated under the Securities Act of 1933, as amended (the "Securities Act"). OTC Markets Group is hereby granted full and complete permission and rights to publish this letter through the OTC Disclosure & News Service for viewing by the public and regulators.

Our firm is special counsel for the Issuer retained to render this opinion and for other corporate matters, and each member of the firm, including the undersigned, (i) is a United States resident, (ii) is licensed to practice law in the State of Utah, (iii) is entitled to practice before the United States Securities and Exchange Commission (the "SEC") and has not been prohibited from practice thereunder, (iv) is not currently and has never been suspended or barred from practicing in any state or jurisdiction, and (v) has never been charged in a civil or criminal case. Additionally, we (i) do not beneficially own any shares of the Issuer's stock (or any other securities of the Issuer), (ii) have not received any shares of the Issuer's stock (or any other securities of the Issuer), and (iii) do not have any agreement to receive in the future any shares of the Issuer's stock (or any other securities of the Issuer) in payment for services or otherwise.

Facts & Assumptions

In connection with rendering this opinion, we have examined such corporate records and other documents and such law as we have deemed necessary or appropriate. In examining the documents, we have assumed, without any independent investigation, the genuineness of signatures (both manual and conformed), the authenticity of documents submitted as originals, the conformity with originals of all documents furnished as copies, the correctness of the facts set forth in such documents, and that the signatories to such documents had all requisite power and authority and has taken all necessary action to duly execute such documents. Nothing came to our attention that led us to conclude that any such documents were not genuine or authentic, or that the facts set forth therein were not true, and all sources of information we have relied upon were believed to be reliable.

This opinion is expressed solely on the facts and assumptions set forth herein; and this opinion is specifically limited to the examinations stated. After such examination, we know of no facts which lead us to conclude that any opinion set forth below is not correct.

In connection with rendering this opinion, we have examined the following specific documents, each of which are available through the OTC Disclosure & News service (collectively the "Information"), and published thereto on the dates indicated: *Annual Report – 2018 Year End Disclosure Statement* of Metrospaces, Inc. for the fiscal year ended December 31, 2018, posted September 20, 2019; *Quarterly Report – Quarterly – 2019 First Quarter Financial Disclosure Statement* for the three months ended March 31, 2019, posted September 20, 2019; and *Quarterly Report – Quarterly – 2019 Second Quarter Financial Disclosure Statement* for the three months ended June 30, 2019, posted September 20, 2019.

Additionally, our firm has (i) met with management, Daniel Silva and Oscar Brito, and the directors of the Issuer, Daniel Silva and Oscar Brito, via video teleconference, (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. We confirmed the number of outstanding shares of the Issuer set forth in the Information by reviewing (i) the shareholder reports provided by the Issuer's transfer agent, West Coast Stock Transfer, Inc., labeled (i) *List of Shareholders – Effective: 12/31/18*, and (ii) *List of Shareholders – Effective: 9/16/19*.

Conclusions

Based upon the foregoing, we are of the opinion that the Information: (i) constitutes "adequate current public information" concerning the Issuer and its securities and "is available" within the meaning of Rule 144(c)(2) promulgated 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 promulgated under the Securities Exchange Act of 1934, as amended (the "Exchange Act"), (iii) complies as to form with OTC Markets Group's *OTC Pink Disclosure Guidelines*, which are located on the internet at *www.otcmarkets.com*, and (iv) has been posted through the OTC Disclosure & News Service.

The financial statements contained in the Information for the fiscal year ending December 31, 2018, and the fiscal quarters ending March 31, 2018, and June 30, 2018, are unaudited financial statements prepared by Steven M. Plumb, CPA, the President and Founder of Clear Financial Solutions, Inc. Mr. Plumb (i) holds a BBA in Accounting from the University of Texas at Austin – Red McCombs School of Business, (ii) has been licensed as a Certified Public Accountant by the Texas State Board of Public Accountancy since approximately June of 1983, and (iii) is President and Founder of Clear Financial Solutions, Inc., which provides accounting solutions to clients. The Issuer's transfer agent is West Coast Stock Transfer, Inc., which is registered with the SEC.

To the best of our knowledge, after inquiry of management and the directors of the Issuer, neither the Issuer, any holder of 5% or more of the Issuer's securities, nor counsel is currently under investigation by any federal or state regulatory authority for any violation of federal or state securities laws.

The Company is not currently, but previously was, a "shell company" as such term is defined in Rule 405 promulgated under the Securities Act and Rule 12b-2 promulgated under the Exchange Act.

The opinions expressed herein represent our reasonable judgment as to the matters of law addressed herein, based upon the facts presented or assumed, and are not, and should not be construed or considered as a guaranty. As previously stated, all sources relied upon were believed to be reliable. Our opinion, as expressed herein, is solely for the benefit of OTC Markets Group and may not be relied upon by another person, firm or corporation for any purpose, without our prior written consent. Our opinion is limited in all respects to the laws of the State of Utah and the federal laws of the United States, and we express no opinion as to the laws of any other jurisdiction.

Sincerely,

BRUNSON CHANDLER & JONES, PLLC

/s/ Lance Brunson

Lance Brunson
Managing Member

cc: Metrospaces, Inc.
c/o Oscar Brito, Chief Financial Officer