

JACKSON L. MORRIS

Attorney at Law

Admitted in Florida and Georgia

November 22, 2019

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

Re: Sports Venues of Florida, Inc.
Trading symbol: BTHR

Ladies and Gentlemen:

I have been engaged as special counsel to Sports Venues of Florida, a Florida corporation with its executive office at 1220 Fordham Drive, Sun City Center, Florida 33573 ("Issuer"), to provide this letter with respect to the information ("Information") publicly disclosed by the Issuer and published through the OTC Disclosure & News Service, including all information published at <http://www.otcmarkets.com/stock/BTHR/profile> and related pages. The Issuer's common stock ("Securities") is quoted on OTC Pink Quote and is traded in the over-the-counter market. Please be advised that OTC Markets Group is entitled to rely on this letter in determining whether the Issuer has made adequate current public information publicly available within the meaning of Rule 144(c)(2) under the Securities Act of 1933 ("Securities Act"). It should be noted that Rule 144(c)(2) does not define or provide a standard for public availability of information. In using this term, I refer to any information which is available to the public from any source, including information which requires payment of a fee to a public official. In particular, the Rule does not require publication of information on or through the OTC Disclosure & News Service.

The Information covered by this opinion includes and is limited to information under the Issuer's control on the "Company Info" page and the items of information indexed on the "Filings" page, as follows:

<u>Title</u>	<u>Period End Date</u>	<u>Publish Date</u>
Annual Report - Annual Report Period Ended May 31, 2018	May 31, 2018	July 18, 2019
Annual Report - Annual Report - Revised May 31, 2019	May 31, 2019	November 15, 2019
Quarterly Report - Quarter Ended August 31, 2019 7A	August 31, 2019	November 22, 2019

I am a citizen and resident of the United States of America. I have assisted the Issuer with preparation of the Annual Report and expect to provide from time to time legal services to the Issuer in the areas of corporate, business transactions and securities law. I am licensed to practice law in Florida and Georgia. The subject matter of this letter covers the jurisdiction of the State of Florida (the Issuer's state of incorporation) and the laws of the United States of America. I have not relied on the work of any other attorney in rendering the opinions set forth below. I am permitted to practice before the U.S. Securities and Exchange Commission and am not prohibited from such practice. I

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am not currently and have not been within the fast five years suspended or barred from the practice of law in any state or jurisdiction or charged in a civil or criminal case.

I own 20,010 shares of the Issuer's common stock. The Issuer has proposed paying my accrued fees in shares of its common stock. Agreement has not been reached as to the number of shares.

For the purpose of this letter, I have reviewed, to the extent I deem relevant to the matters covered by this letter, and relied upon the following:

Documents publicly available -

- a. a true copy of the Articles of Incorporation the Issuer filed July 28, 2009 and all amendments thereto, being through April 21, 2014;
- b. the bylaws of the Issuer dated July 2009.
- c. information published by the Issuer through the OTC Disclosure & News Service on OTCMarkets at the Internet address of <http://www.otcmarkets.com/stock/BHTR/profile> and related pages, in particular, the documents listed on the "Filings and Disclosure" page in the active category;
- d. a list of all transfer agents registered as of June 2, 2011 with the U.S. Securities and Exchange Commission ("Commission") pursuant to Section 17A of the Securities Exchange Act of 1934, as amended, as provided by the staff of the Commission;

Documents not publicly available -

- a. An agreement dated September 26, 2011 pursuant to which the Issuer engaged the Securities Transfer Corporation as the Issuer's transfer agent ("Transfer Agent");
- b. A "Shareholders with Certificate Detail" report from the Transfer Agent dated June 25, 2019 ("TA Advice") stating the number of issued and outstanding shares of common stock at May 31, 2019, no new issues during the 2019 fiscal year.

I have also reviewed and relied upon such other documents and certificates of the Issuer and of public officials as I have deemed necessary and relevant to the subject matter this letter. I have assumed the due and proper election or appointment of all persons signing and purporting to sign the documents in their respective capacities, as stated therein, the genuineness of all signatures, the conformity to authentic original documents of the copies of all such documents submitted to me as certified, true, conformed and photocopied, including the quoted, extracted, excerpted and reprocessed text of such documents. As to matters of fact, I have relied on information obtained from public officials, officers of the Issuer and other sources, which I believe to be reliable.

I have also reviewed and am familiar with Rule 144 under the Securities Act and Rule 15c2-11 under the Securities Exchange Act of 1934 (the "Exchange Act"). It should be noted that the only information required by Rule 144(c)(2) that is required to be publicly available is limited to the information identified in paragraphs (a)(5)(i) to (xiv) and (a)(5)(xvi) of Rule 15c2-11. The required information is less extensive than the information identified in OTC Pink Basic Disclosure Guidelines 3.0, February 2019. It should be noted that the OTC Markets "Alternative Reporting Standard" is a voluntary, privately

operated system unrelated to the statutory reporting requirements set forth in Sections 13 and 15(d) of the Exchange Act.

The Information (i) constitutes “adequate current public information” concerning the Securities and the Issuer and “is available” within my understanding of the meaning of Rule 144(c)(2) 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 (see Appendix "A", hereto), (iii) complies as to form with OTC Pink Basic Disclosure Guidelines 3.0, February 2019, and (iv) has been published through the OTC Disclosure & News Service.

I have been advised by the Issuer that Thomas Bellante, CPA, the Issuer’s chief financial officer, is responsible for the preparation of the financial statements contained in the Information. The financial statements are not audited. Mr. Bellante is a certified public accountant whose current firm and previous firm is PCAOB qualified

The Transfer Agent’s address is 2901 Dallas Pkwy Suite 380, Plano, TX 75093. According to information obtained from the Commission, the Transfer Agent was registered with the Commission pursuant to Section 17A of the Exchange Act as of June 2, 2011 and I have no reason to believe such registration has been terminated. The TA Advice states that the number of issued and outstanding shares of common stock at the close of business on May 31, 2018, May 31, 2019 and August 31, 2019 was 1,650,271 shares.

I have (i) personally met with management and a majority of the directors of the Issuer named in the table following this paragraph, (ii) reviewed the Information published by the Issuer through the OTC Disclosure and News Service and (iii) discussed the Information with management and a majority of the directors of the Issuer.

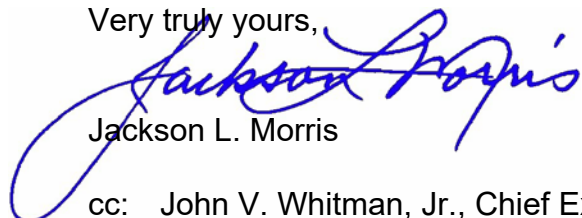
Name	Position
John V. Whitman, Jr.	Sole director and Chief Executive Officer

To the best of my knowledge, after inquiry of management and a majority of the directors of the Issuer, neither of the Issuer, any five percent holder of the Issuer’s securities is, nor am I, currently under investigation by any federal or state regulatory authority for any violation of federal or states securities laws.

At various times since inception, the Issuer has previously been and is now a “shell company” as defined in Rules 405 of the Securities Act of 1933 and 12b-2 of the Exchange Act of 1934. The Issuer has agreements for two acquisitions which, when closed, will terminate the Issuer’s current “shell company” status.

No person other than OTC Markets Group is entitled to rely on this letter. Notwithstanding this limitation of reliance, I hereby grant OTC Markets Group full and complete permission and right to publish this letter through the OTC Disclosure and News Service for viewing by the public and regulatory agencies; provided, that such permission to publish and the publication hereof shall not be deemed a waiver of the limitations of reliance set forth in this paragraph.

Very truly yours,


Jackson L. Morris

cc: John V. Whitman, Jr., Chief Executive Officer
Sports Venues of Florida, Inc.