

RENETTE JACKSON, Esq.

Attorney at Law

28569 Northwestern Highway, Southfield, MI 48034

248-910-5415

April 3, 2020

OTC MARKET GROUPS, INC.
MINERCO, INC. (MINE)
RE: ANNUAL DISCLOSURE 2019

Dear Sir or Madam:

We have acted as counsel to MINE (the "Company") on specific securities and corporate issues and were retained for the purpose of reviewing the current information supplied by the Company. We are domiciled and licensed in the State of Michigan. We are residents of the United States. OTC Markets may rely upon this letter in determining whether the Company has made adequate current Information publicly available in accordance with Rule 144 (c) (2) under the Securities Act of 1933. Attorney Renette Jackson is not currently, or within the past five years, barred or suspended from practicing in any state or jurisdiction and has not been charged in any civil or criminal case. Attorney Renette Jackson is not currently, or has in the past five years, been the subject of an investigation, hearing, or proceeding by the SEC, the U.S. Commodity Futures Trading Commission (CFTC), the Financial Industry Regulatory Authority (FINRA), or any other federal, state, or foreign regulatory agency. Neither Attorney Renette Jackson nor any person associated with her law firm owns any shares of issuer's securities and has never received or has any agreement to receive any of the issuer's stock in payment for services.

We have (i) personally interviewed via phone conference the management and all directors of the Company, more specifically Julius Makiri Jenge, all owners of 5% or greater of

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This letter covers the laws of the United States and does not depend on another law firm's opinion letter. We are permitted to practice before the Securities and Exchange Commission without prohibition. A representative of the Company is responsible for the preparation of the

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financial statements in accordance with GAAP, under the supervision of the CEO and is unaudited.

We may rely on information obtained from the public officials, officers of the Company and we believe that these sources are reliable. In rendering this letter, we have examined the following:

1. Corporate records and other documents of the company.
2. Financial documents including: Consolidated Balance Sheet, Consolidated Statement of Operations, Consolidated Statement of Cash Flows, Statement of Changes in Shareholder's Equity and notes to the financial statements for the year ending July 31, 2019, Consolidated Balance Sheet, Consolidated Statement of Operations, Consolidated Statement of Cash Flows, Statement of Changes in Shareholder's equity and notes to the financial statements for the periods ending July, 31, 2019, July 31, 2019 and October 31, 2019, October 31, 2019. The financial documents for these periods were prepared by Sam Messina. Mr. Messina is an accountant whose address is 2507 Deplanes Avenue, North Riverside, IL 60548. Mr. Messina is a CPA with over eighteen years' experience in preparing financial documents for public and private companies. The financial statements are not audited.
3. Representations made to us by the officers and directors of the Company which we deem as reliable.
4. Review of the Shareholders' list provided by the Company's transfer agent: Worldwide Stock Transfer LLC, 1 University Plaza, Suite 505, Hackensack, NJ 07601 phone 201-

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820-2008 indicating the shares outstanding and confirming that Worldwide Stock Transfer LLC is registered with Securities and Exchange Commission.

This letter is governed by and shall be interpreted in accordance with the Legal Opinion Accord ("the Accord") of the American Bar Association Section of Business Law (1991). Therefore, it is subject to a number of qualifications, exceptions, definitions, limitation on coverage, and other limitations, all as more particularly described in the Accord, and this letter should be read in conjunction therewith. The law relevant to the opinions expressed herein is limited to the laws of the United States of America.

Based upon the foregoing and subject to the qualifications hereinafter set forth, we are of the opinion that the initial Company Information and Disclosure Statement:

1. Constitutes "adequate current public information" concerning the securities and the Company "is available" within the meaning of Rule 144 (c) (2) under the Securities Act of 1933.
2. Includes all the information that a broker-dealer would be required to obtain from the Company to publish a quotation for the securities under Rule 15c2-11 under the Securities Exchange Act of 1934.
3. Complies as to form with the OTC Market Guidelines for providing adequate Current Information, which are located on the internet at www.OTCmarkets.com.
4. Has been posted through the OTC Disclosure and News Service; and
5. Worldwide Stock Transfer LLC is registered under the Securities and Exchange Act of 1934.

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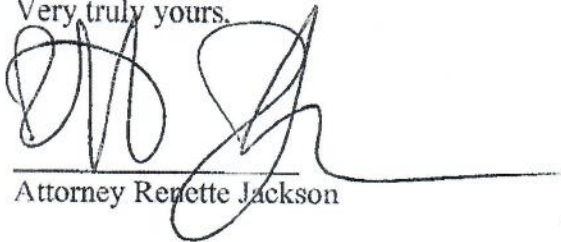
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6. The company does not currently meet the definition of a shell corporation. It has not filed as a shell company in the past but has met the definition of a shell company in 2013 in that its only asset was \$1,050.00 in cash.

This letter may be relied on by OTC Markets, Inc., but may not be used or relied upon by any other person for any other purpose whatsoever, without in each instance our prior written consent. OTC Markets may publish this letter through OTC Disclosure and News Service for viewing by the public or regulators.

Very truly yours,

A handwritten signature in black ink, appearing to be 'Renette Jackson', written over a horizontal line.

Attorney Renette Jackson