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20 August 2020

OTC Markets Group, Inc.
304 Hudson Street
Second Floor
New York, New York 10013

Re: Megola, Inc. information on OTC Disclosure and News Service

Dear Sir or Madame:

I have been retained by Megola, Inc., a Nevada corporation (the "Company") for the limited purpose of rendering an opinion as to whether there is adequate current information available on the OTC Disclosure and News Service regarding the issuer and related matters. As such, OTC Markets Group is entitled to rely on such opinion in determining whether the issuer has made adequate current information publicly available within the meaning of Rule 144(c)(2) of the Securities Act of 1933.

In connection with this opinion I have examined the appropriate corporate organizational documents of the Company, including, but not limited to, the following:

1. The Company's Certification of Incorporation;
2. Articles of Incorporation;
3. Amended and Restated Articles of Incorporation;
4. Bylaws;
5. Custodianship Documents (filed with the 8th Judicial District Court, Clark County, Nevada)
6. The Company's Annual Disclosure Report and Financial Statements for the period ended March 31, 2020, and filed on August 18, 2020;
7. The Company's First Quarter Report and Financial Statements for the period ended June 30, 2020 and filed on August 18, 2020;
8. Various Corporate Documents deemed relevant to corporate transactions;
9. The Company's confirmation of issued and outstanding shares from Colonial Stock Transfer Co., Inc., 66 Exchange Place, Suite 100, Salt Lake City, Utah 84111; and
10. The Guidelines for Providing Adequate Current Information as published by Pink OTC Markets, Inc.

The Company's unaudited annual financial statements, for the fiscal year ending March 31, 2020, were prepared by Li Shen, CGA, of The Accounting Connection, located at 145-251 Midpark Blvd., S.E., Calgary, Alberta T2X 1S3 Canada and are not audited. The financial statements are prepared in conformity with accounting principles generally accepted in the United States. In all material respect, the financial statements filed with the OTC Market Groups, fairly present the financial position and results of operations of the Company, as well as cash flows, for the period presented.

Megola, Inc. ("Megola" or "the Company") was incorporated in the State of Nevada under the name SuperiorClean, Inc. on March 29, 2001, to franchise and support third party carpet cleaning operations. On

September 25, 2003, the Company changed its name to Megola, Inc. pursuant to an acquisition agreement with Megola, Inc., an Ontario company ("Megola Canada"). On November 26, 2003, the Company and Megola Canada completed the agreement by way of a reverse acquisition. Megola Canada was formed to sell physical water treatment devices to a wide range of end-users in the United States, Canada and internationally under a license granted by Megola GmbH in Germany. Megola operated up until March 2, 2016 when it no longer had the financial resources to continue to meet its ongoing obligations in the normal course and was subsequently struck in the State of Nevada. Today, the Company is a shell corporation and is currently seeking acquisitions.

On March 31, 2018, the Company divested of its wholly owned subsidiary, Megola, Inc., an Ontario, Canada corporation.

The Company was reinstated on May 9, 2018 and on May 17, 2018, the 8th District Court for Clark County, Nevada, entered an Order granting the application for custodianship of Megola, Inc. to International Venture Society, LLC. Further, on May 22, 2018, the Company effected a reverse split of the Series A, B and C Preferred Shares; 1 share for each outstanding 1,500,000 Series B Preferred Shares, and 1 share for each outstanding 1,500,000 Series C Preferred Shares. Further to this reverse split, the Company amended the authorized shares of Series A Preferred Stock to 200 shares, Series B Preferred Stock 100 shares and Series C Preferred Stock to 100 shares on August 6, 2019.

On September 24, 2018, Mr. William Eric Ottens, our sole officer and director, paid \$50,000 to the then controlling shareholder, John Stippick, for 1 share of Special 2018 Series A Preferred Shares. This effected a change of control.

On September 25, 2018, the Company entered into a formal agreement to ratify the divestiture of the shares of our former controlled subsidiary, Megola Canada, in agreement with 1863942 Ontario Corporation, an entity controlled by the officer and director of Megola Canada who is also a shareholder of the Company. Under the terms of the agreement, the Company transferred the shares of Megola Canada to 1863942 Ontario Corporation and assumed certain debts incurred in prior periods in the amount of \$205,184 which were paid by 1863942 Ontario Corporation.

On December 24, 2018, effective February 13, 2019, the Custodianship of Megola, Inc. in the State of Nevada was discharged.

On January 25, 2020, the sole member of the Board of Directors and majority shareholder of the Company approved an Amendment to the Articles of Incorporation whereby, the Company designated a series of Preferred Shares, being Series D, E, F and G and approved the cancellation of the 2018 Special Series B and D shares of preferred stock upon their return to treasury. The Certificate of Amendment was filed with the State of Nevada on February 28, 2020.

Further on May 21, 2020, Mr. William Ottens resigned as the sole officer and director of the Company and Mr. Robert Gardiner was appointed President and director and Mr. Rodney Nettles was appointed Secretary/Treasurer and director.

On January 30, 2020, Mr. William Ottens, formerly our sole officer and director, entered into an agreement with Mr. Rodney Nettles, whereby Mr. Ottens will sell his 1 share of 2018 Special Series A Preferred Stock for \$50,000 and the two additional shareholders have agreed to the cancellation of 20,000,000 shares of 2018 Special Series D Preferred Stock and 10,000,000 shares of 2018 Special Series B Preferred Stock in

consideration for aggregate \$15,000. This agreement, when completed, will effect a change in control of the Company. As of the date of this filing, Mr. Ottens remains the controlling shareholder of the Company.

Upon discharge of the Company from Custodianship in fiscal 2018 (effected by the State in February 2019) the Company adopted an opening balance sheet consisting only of identified assets and liabilities. All balances outstanding prior to the Company becoming defunct in fiscal 2016 were written off and are included in the Company's accumulated deficit. Concurrent with his appointment as the sole officer and director, Mr. Ottens, as the controlling shareholder, selected a fiscal year end of March 31. The Company is a shell, with no operations.

COVID-19 Pandemic: The recent COVID-19 pandemic could have an adverse impact on the Company going forward. COVID-19 has caused significant disruptions to the global financial markets, which severely impacts the Company's ability to raise additional capital and to pursue certain of its revenue contracts. The Company has given notice of furlough to its administrative support employees in an effort to conserve resources as we evaluate our business development efforts in the coming months. The Company may be required to substantially reduce operations or cease operations if it is unable to finance our operations. The full impact of the COVID-19 outbreak continues to evolve as of the date of this report, and is highly uncertain and subject to change. Management is actively monitoring the situation but given the daily evolution of the COVID-19 outbreak, the Company is not able to estimate the effects of the COVID-19 outbreak on its operations or financial condition in the next 12 months. To mitigate impact the Company is currently focusing its efforts on contracts in the wireless and cellular telecommunications segment, as well as the infrastructure components of its existing contracts to allow for continuity and forward momentum.

Megola, Inc. is a Nevada corporation with its headquarters located in Spring, Texas. The Company's transfer agent is Colonial Stock Transfer Co., Inc., 66 Exchange Place, Suite 100, Salt Lake City, Utah 84111, and is registered with the Securities and Exchange Commission. The number of issued and outstanding shares was confirmed to me via email from Colonial Stock Transfer on April 30, 2020.

There are currently 196,095,060 shares of Megola, Inc. Common Shares; 70 shares of Series A Preferred Shares; 6 shares of Series B Preferred Shares; 8 shares of Series C Preferred Shares; 1 share of Special 2018 Series A Preferred Shares; 10,000,000 shares of Special 2018 Series B Preferred Shares; 20,000,000 shares of Special 2018 Series D Preferred Shares; 0 shares of Series D Preferred Shares; 0 shares of Series E Preferred Shares; 0 shares of Series F Preferred Shares; and 0 shares of Series G Preferred Shares issued and outstanding. The following table sets forth new share issuances of common and preferred shares since March 31, 2020:

# OF I/O	DATE	# OF SHARES NEW ISSUANCE	NAME	REASON	EXEMPTION
196,095,060 Common Shares 70 Series A Preferred Shares 6 Series B Preferred Shares 8 Series C Preferred Shares 0 Special 2018 Series A Preferred Shares 0 Special 2018 Series B Preferred Shares	3/31/2018				

0 Special 2018 Series D Preferred Shares 0 Preferred Series D Shares 0 Preferred Series E Shares 0 Preferred Series E Shares 0 Preferred Series E Shares					
	9/24/2018	1 Share Special 2018 Series A Preferred Shares	John Stippick	Consulting Fees	Reg D, Rule 504
	9/24/2018	10,000,000 shares of Special 2018 Series B Preferred Shares	Frank Clear	Consulting Fees	Reg D, Rule 504
	9/24/2018	20,000,000 shares of Special Series D Preferred Shares	MC Endeavors (John Stippick) (1)	Consulting Fees	Reg D, Rule 504
196,095,060 Common Shares 70 Series A Preferred Shares 6 Series B Preferred Shares 8 Series C Preferred Shares 1 Special 2018 Series A Preferred Shares 10,000,000 Special 2018 Series B Preferred Shares 20,000,000 Special 2018 Series D Preferred Shares 0 Preferred Series D Shares 0 Preferred Series E Shares 0 Preferred Series E Shares 0 Preferred Series E Shares	3/31/2019				
196,095,060 Common Shares 70 Series A Preferred Shares 6 Series B Preferred Shares 8 Series C Preferred Shares 1 Special 2018 Series A Preferred Shares 10,000,000 Special 2018 Series B Preferred Shares 20,000,000 Special 2018 Series D Preferred Shares 0 Preferred Series D Shares 0 Preferred Series E Shares 0 Preferred Series E Shares 0 Preferred Series E Shares	3/31/2020				

(1) MC Endeavors, Inc, a Nevada corporation, is a reporting issuer, its officer and director at the time of the issuance was John Stippick. Mr Stippick was also the controlling shareholder at the time of

the share issuance controlling more than 10% of Mc Endeavors, Inc. total issued and outstanding shares of common stock. Currently, the officer and director of MC Endeavors is Stephen Mazurek.

The authorized capital of the Company is 3,000,000,000 shares of Common Stock, par value \$0.001; 200 shares of Series A Preferred Stock, par value \$0.001; 100 shares of Series B Preferred Stock, par value \$0.001; 100 shares of Series C Preferred Stock, par value \$0.001; 1 share of Special 2018 Series A Preferred Stock; par value \$0.001; 30,000,000 shares of Special 2018 Series B Preferred Stock, par value \$0.001; 20,000,000 shares of Special 2018 Series D Preferred Stock, par value \$0.001; 5,000,000 shares of Series D Preferred Stock, par value \$10.00; 5,000,000 shares of Series E Preferred Stock, par value \$5.00; 25,000,000 shares of Series F Preferred Stock, par value \$1.00; and 10,000,000 shares of Series G Preferred Stock, par value \$1.00.

In connection with the opinion expressed herein, I have made such examination of law, as I considered appropriate for such purposes, and have relied entirely upon documents and certificates delivered to me and which I deemed appropriate for purposes of rendering this opinion. In examining the documents, I have assumed the genuineness of signatures, the authenticity of documents submitted as originals, the conformity with originals of all documents furnished as copies, and the correctness of the facts set forth in such documents. During the course of my review, nothing led me to question the authenticity of any of the documents or facts contained herein. To that end, I am of the opinion that:

1. The current information posted by the Company constitutes adequate current public information and is publicly available as those terms are defined within the meaning of Rule 144(c)(2) under the Securities Act; the information includes all of the information that a broker-dealer would be required to obtain from the Company to publish a quotation for the Securities pursuant to Rule 15c2-11 under the Securities Exchange Act of 1934 as amended;
2. The aforementioned information as posted through the OTC Disclosure and News Service complies as to form and content with the OTC Markets Group, Inc. Guidelines for Providing Adequate Current Information as published by the OTC Market Groups, Inc.;
3. To the best of my knowledge, neither counsel, nor the members of management, the record owner of the Company, or any holder of 5% or more of the Company's securities are currently under investigation by any federal or state regulatory authority for any violation of federal or state securities laws;
4. I have personally met (via video skype, with government issued identification; i.e. Ontario, Canada Driver's License) with Mr. Robert Gardiner Chief Executive and Director of the Company;
5. The Company's transfer agent is Colonial Stock Transfer Co., Inc., 66 Exchange Place, Suite 100, Salt Lake City, Utah 84111, and is registered with the Securities and Exchange Commission. The number of issued and outstanding shares was confirmed to me via email from Colonial Stock Transfer on August 19, 2020.
6. To the best of my knowledge, and pursuant to review of publicly filed documents, between the date the Company was abandoned, the date International Venture Society LLC took custody of the Company pursuant to the Court Order (May 7, 2018), and to date, the Company was, and is, a "shell company" as defined in Rules 405 of the Securities Act of 1933 and 12b-2 of the Exchange Act of 1934.

The opinions and conclusions expressed herein are based upon the facts that have been provided to me by the Company and are based on the accuracy of the facts and representations of the Company. In reaching my conclusions, I have personally met management and the majority of directors of Megola, Inc. and have exchanged numerous emails and telephone conversations with corporate management. I have assumed the

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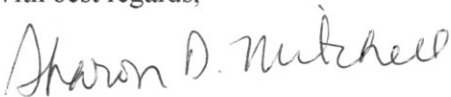
genuineness and authenticity of all documents provided to me; to the best of my knowledge I believe all sources to be reliable.

I am a resident of the United States and am licensed and authorized to practice law in the State of Michigan. This letter applies to the laws of the United States of America. I am allowed to practice before the Securities and Exchange Commission, and I have not been prohibited from practicing before it. I am the Company's SEC counsel with regard to compliance matters and public filings. I do not own any common or preferred stock of Megola, Inc., and I do not anticipate receiving any in the immediate future.

I am not currently, nor have I been in the past five years (nor at any time), the subject of an investigation, hearing, or proceeding by the SEC, the US Commodity Futures Trading Commission (CFTC), the Financial Industry Regulatory Authority (FINRA), or any other federal, state, or foreign regulatory agency. Furthermore, I am not currently, nor have I been in the past five years (nor at any time) suspended or barred from practicing in any state or jurisdiction, nor have I been charged in a civil or criminal case.

This opinion is rendered in conjunction with the Company's current disclosure documents and may be posted on the OTC Disclosure and News Service, for viewing by the public and regulators; however, only OTC Markets Group is entitled to rely on this opinion.

With best regards,

A handwritten signature in cursive script that reads "Sharon D. Mitchell".

Sharon D. Mitchell
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cc: Mr. Robert Gardiner, President