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September 25, 2020

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

RE: Suntex Enterprises, Inc. (the "Issuer")

Dear Sir or Madam:

I represent Suntex Enterprises, Inc., (Symbol: SNTX)), a Nevada corporation (the "Issuer") as its legal counsel. My client has requested that I render a legal opinion as to whether there is adequate current information available on the OTC Disclosure and News Service for the Issuer and related matters relative to its Quarterly Reports for the periods ended September 30, 2019, March 31, 2020 and June 30, 2020, as well as the annual report for the period ended December 31, 2019. I am not a employee of the Issuer and I have received no shares of the Issuer's stock in payment for my services. Further, I have no agreement in place to receive future shares of the Issuer's stock in payment for services and I do not own, directly or beneficially, any shares of the Issuer's securities.

This opinion is meant to apply to the laws of the United States. I am a resident of the United States and licensed to practice in the state courts of Oregon and Washington and am also admitted to practice in the U.S. District Court for the District of Oregon and in the U.S. Tax Court. I am also permitted to practice before the Securities and Exchange Commission ("SEC"), and have not been prohibited from practice thereunder. I am not now nor have I ever 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. I am not now nor have I ever been suspended or barred from practicing in any state or jurisdiction nor have I ever been charged in a civil or criminal case.

This opinion does not rely on the work of other counsel.

I have examined the corporate records, documents and such questions of law that I consider necessary or appropriate for purposes of rendering this Opinion Letter. In my review I have met with the Board of Directors and management of the Issuer and have relied upon the representations of management and officers whom I believe to be reliable sources. I have reviewed the Issuer's corporate records including the following:

- Quarterly Report (as revised) for the period ended June 30, 2019 (posted July 6, 2020)
- Quarterly Report for the period ended September 30, 2019 (posted June

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- 30, 2020)
- Annual Report for the period ended December 31, 2019 (posted September 21, 2020)
  - Quarterly Report for the period ended March 31, 2020 (posted September 21, 2020)
  - Quarterly Report for the period ended June 30, 2020 (posted September 21, 2020)

In my review I have relied upon the representations of management and officers of the Issuer and on publicly available information regarding the Issuer including financial statements listed above.

I have personally spoken with Lawrence Twombly, who is the CEO/CFO and the sole member of the Board of Directors of the Issuer, and all of the information I requested as a basis for this opinion has been provided to me and I believe the sources of information reviewed are reliable. In addition, I have reviewed the definition of current information set forth in SEC Rule 144(c)(2) under the Act ("Other Public Information") as well as the relevant provisions of Rule 15c2-11 of the Securities Exchange Act of 1934 (the "Exchange Act"), and the OTC Markets Group's Guidelines for Providing Adequate Current Information. In my opinion, the information provided:

(A) constitutes "adequate public information" concerning the Securities and the Issuer and "is available" within the meaning of Rule 144(c)(2) of the Act;

(B) 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 under the Exchange Act;

(C) complies as to form with the OTC Markets Group's Guidelines for Providing Adequate Current Information, which is located at:

[www.otcmarkets.com](http://www.otcmarkets.com)

and

(D) has been posted through the OTC Disclosure and News Service.

The Issuer represents that it is not now nor has it ever been a "shell" corporation as defined in Rules 405 of the Securities Act of 1933 and 12b-2 of the Exchange Act of 1934. My research of public filings supports this statement.

All of the financial statements for the Issuer for the period covered by this opinion are the responsibility of Lawrence Twombly and have been prepared in final form by him with assistance from me. These financial statements have not been audited or presented as such.

Mr. Twombly's corporate address is 7380 Southeastern Avenue, Suite 124, Las Vegas, Nevada. Mr. Twombly has extensive experience managing public companies and other business interests and is also well qualified by experience to prepare these financial statements with assistance from outside accountants when needed. I assisted Mr. Twombly in preparing these financial statements, In addition to being an attorney with over 30

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years of practicing experience, I have also been a practicing CPA licensed in the state of Oregon for nearly 40 years working with a wide variety of tax and accounting clients in all manner of situations.

The transfer agent for the Issuer is Action Stock Transfer Corporation, 2469 Fort Union Blvd, #214, Cottonwood Heights, Utah 84121. It should be noted that Action Stock Transfer Corporation ("ACTION") became the Issuer's transfer agent on July 12, 2019. Prior to that time, Madison Stock Transfer, Inc., 2715 Coney Island Avenue, 2<sup>nd</sup> Floor, Brooklyn, New York 11235 had been the Issuer's transfer agent. ACTION is not listed on the Disclosure Report for the period ended June 30, 2019 because Madison Stock Transfer, Inc., was the transfer agent at all relevant times during the quarter ended June 30, 2019 and did not become the new transfer agent until after the end of that quarter. The change in transfer agents was effectuated by an internal decision for financial and efficiency reasons and did not involve a dispute or any ethical questions. Both the current and the former transfer agents are registered with the SEC. I have requested and obtained a copy of the shareholders' list provided to me by management and have confirmed that the number of shares issued is consistent with the corporate records of the Issuer. I have reviewed the disclosure documents currently published on otcmarkets.com for this Issuer, and have personally reviewed the information published by the Issuer on OTC Markets News Service, and have discussed the information with management.

#### Promotional Activity:

Lawrence L. Twombly is the CEO, CFO, secretary and the only member of the Board of Directors of the Issuer. Mr. Twombly's business address is 7380 South Eastern Avenue, Suite 124, Las Vegas, Nevada 89123. Mr. Twombly owns 40,000,000 common shares of the Issuer, which is equivalent to 60% of the outstanding common shares of the Issuer. Mr. Twombly originally received 250,000,000 restricted common shares from Jim Anderson, the former CEO, when he brought his business into the company and became CEO on August 7, 2018. On October 19, 2018, Mr. Twombly agreed to the cancellation of 210,000,000 of his common stock holdings as part of a company re-structuring plan. This left him with his present holdings of 40,000,000 restricted common shares.

Bradley Wilson owns 25,000,000 restricted common shares of the Issuer's stock, which equals approximately 37% of the outstanding common shares of the Issuer. Mr. Wilson lives in Ontario, Canada. Mr. Wilson purchased his shares on July 16, 2018, from another party who had converted his debt to shares before selling them to Mr. Wilson. Mr. Wilson's shares are restricted and he has held them continuously since he purchased them. Mr. Wilson is not now and never has been an officer or director of the Issuer. Mr. Wilson has never received any shares in any form as compensation for any services.

Charles Abujudeh owns 500,000 which he received on April 9, 2018 from conversion of debt he had previously held. Mr. Abujudeh's stock has been held continuously and is restricted. Mr. Abujudeh has never received any shares in any form as compensation for any services.

In July, 2019, the Issuer's management engaged Charles Abujudeh to conduct an awareness campaign for the Issuer's operations and beverage products. Mr. Abujudeh then hired interactiveOffers.com to perform that

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service for him. In the judgment of management, it was believed that an awareness campaign would be beneficial in directing attention to the Issuer's website and in highlighting its new direction and line of products. The Issuer received assurance that no misleading information would be disseminated in connection with the awareness campaign and took action of its own to attempt to prevent that. The Issuer further believed that Mr. Abujudeh's hiring of InteractiveOffers.com included full disclosures of that hiring. Upon learning of OTC Market's Caveat Emptor designation of the Issuer's stock, the Issuer stopped that campaign and terminated the engagement of Mr. Abujudeh. The engagement of Mr. Abujudeh was never memorialized in writing and he was never paid for his services.

On August 13, 2019, the Issuer filed a Disclosure Report for the period ended June 30, 2019. This Disclosure Report was prepared by Lawrence L. Twombly, CEO of the Company, with my assistance according to the format required by otcmarkets.com. Mr. Twombly is the control person with regard to the Issuer's stock. Mr. Twombly did not receive securities of the Issuer as compensation for his completion of the Disclosure Reports covered by this opinion nor did any other party receive securities of the Issuer or the promise of securities of the Issuer in connection with completion of these Disclosure Reports.

The promotional activity noted above, was engaged in by InteractiveOffers.com, 4181 NW 1<sup>st</sup> Avenue, Suite 6, Boca Raton, Florida 33441. InteractiveOffers.com was hired by Charles Abujudeh, 24771 Rittenhouse, Laguna Hills, CA 92653. Neither Interactiveoffers.com, Charles Abujudeh nor any other party received any stock as compensation pertaining to said awareness campaign.

I have made specific inquiry of Mr. Twombly, Interactiveoffers.com, Mr. Abujudeh and Mr. Wilson regarding this matter. Based upon such inquiries and other information available to me, I have been assured that any sales of the Issuer's securities by insiders within the twelve month period prior to the this opinion have been made in compliance with Rule 144, including, without limitation, any required filings of Form 144, and nothing has come to my attention indicating that any of the insiders is in possession of any material non-public information regarding the Issuer or the securities that would prohibit any of them from buying or selling the securities under Rules 10b-5 or 105-1 under the Exchange Act. In point of fact, transfer agent records confirm that no actual sales by insiders occurred during this period or at any time since then.

I have confirmed with management that management is not aware of any investigation of the Issuer or of any beneficial owner, officer, director or legal counsel of the Issuer by any federal or state regulatory authority, including the SEC. After a review of documents as set forth above, and consultation with management, it is my opinion that the information presently being provided by the Issuer to OTC Markets Disclosure and News Service in the Financial Reports and Disclosure Information constitutes adequate current public information concerning the Issuer within the meaning of Rule 144(c)(2) of the Act.

OTC Markets, Inc., is entitled and authorized to rely upon this letter in determining whether the Issuer has made adequate information publicly available within the meaning of Rule 144(c)(2) under the Securities Act of 1933. No person other than OTC Markets, Inc., is entitled to rely on this letter, but full permission is granted to OTC Markets, Inc., to

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RE: Suntex Enterprises, Inc. (the "Issuer")

publish this letter through the OTC Disclosure and News Service for viewing by the public and regulators.

Sincerely,

A handwritten signature in cursive script, appearing to read "Vic Devlaeminck".

Vic Devlaeminck

Attorney for Suntex Enterprises, Inc.

VD/wp