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10 March 2021

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

Re: Holistic Asset Finance Group Co., Ltd information on OTC Disclosure and News Service

Dear Sir or Madame:

I have been retained by Holistic Asset Finance Group Co., Ltd, 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. The Company’s Amended Annual Report – 2020 Annual Disclosure with Financial Statements for the period ended December 31, 2020, and filed on March 10, 2021;
6. The Company’s Third Quarter Report for the period ended September 30, 2020, and filed on November 28, 2020;
7. The Company’s Second Quarter Report for the period ended June 30, 2020, and filed on August 6, 2020;
8. The Company’s First Quarter Report for the period ended March 31, 2020, and filed on June 11, 2020;
9. The Company’s Annual Report – 2019 Annual Disclosure Statement with Financial Statements for the period ended December 31, 2019, and filed on June 11, 2020;
10. Various Corporate Documents deemed relevant to corporate transactions;
11. The Company’s confirmation of issued and outstanding shares from Corporate Stock Transfer, located at 3200 E Cherry Creek South Dr., Suite 430, Denver, Colorado 80209-3246; and
12. 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 December 31, 2020, were prepared by Yan Cui, Chief Financial Officer of the Company 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.

Holistic Asset Finance Group Co., Ltd (the "Company" or "HAFG") was incorporated in the State of Nevada on March 16, 1998, as Noble Quest, Inc. On February 11, 2008, the Company filed a Certificate of Amendment with the State of Nevada and changed its name to Legend Media, Inc. On November 25, 2019, the Company filed a Certificate of Amendment with the State of Nevada, changing its name to Holistic Asset Finance Group Co., Ltd.

On February 7, 2019, Joseph Arcaro filed an Application for Appointment of Custodian, petition number A-19-789026-P (the "Application") with the District Court in Clark County, Nevada (the "Court").

On March 18, 2019, the Company filed a Form 15-12g with the Securities and Exchange Commission, and ceased its reporting duties with the SEC, becoming an alternative reporting company.

On March 21, 2019, the Court issued an Order Granting Application for the Appointment of Joseph Arcaro as Custodian of the Company.

On October 2, 2019, the Company's Board of Directors authorized a reverse one-for-one hundred (1-for-100) split of the Common Stock (the "Reverse Split"). The Reverse split had no effect on the authorized Common Stock or the authorized or issued and outstanding Preferred Stock. On October 25, 2019, the Company filed a notification of the reverse stock split (the "Notice") with the Financial Industry Regulatory Authority ("FINRA"). After completion of review by FINRA, on December 11, 2019, the outstanding Common Shares decreased to 3,628,185 shares.

On October 22, 2019, the Court entered an Order Granting Motion to Terminate Custodianship.

On June 1, 2020, the Company entered into a Share Exchange Agreement with Plural Capital Company Limited ("Plural") and the Company's CEO, Mr. Liu Zhongkuo, pursuant to which the Company issued 10,000,000 shares of Common Stock (the "Acquisition Shares") in exchange for Mr. Liu's 75% equity ownership stake in Plural (the "Acquisition"). Following the Acquisition, the Company became the 75% equity holder in Plural. The Acquisition was structured as a tax-free reorganization. The Company issued the Acquisition Shares using an exemption from registration under Section 4(a)(2) of the Securities Act.

Plural is a financial services firm based in Hong Kong which specializes in providing a complete range of financial advisory services on matters ranging from financial investment to mergers and acquisitions.

**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.

Holistic Asset Financial Group Co., Ltd is a Nevada corporation with its headquarters located in New York. The Company's transfer agent is Corporate Stock Transfer, located at 3200 E Cherry Creek South Dr., Suite 430, Denver, Colorado 80209-3246 and is registered with the Securities and Exchange Commission. The number of issued and outstanding shares was confirmed to me via email from Corporate Stock Transfer via email on March 2, 2021.

The method used to obtain the number of outstanding shares as set forth in the Annual Report for the period ending December 31, 2020 (33,928,185), for the period ending December 31, 2018, (1,128,185) and as at March 5, 2021 (33,928,185) determined by the following: on December 31, 2018, there were 1,128,185 (this number is retroactively shown after the 1 for 100 split was completed on December 11, 2019) shares of common shares issued and outstanding, and 2,083,333 shares of Series A Preferred Stock issued and outstanding were the result of the following transactions: (1) On May 30, 2019, 1,000 shares of Series L Preferred Stock were issued to Algonquin Partners, Inc. (Joseph Arcaro) for debt forgiveness; (2) on June 10, 2019, 2,500,000 common stock were issued to Algonquin Partners for settlement of related party debt and consulting services; (3) on April 21, 2020, 20,000,000 shares of common stock were issued to Zhongkuo Liu for debt forgiveness; (4) on June 1, 2020, 10,000,000 shares of common stock were issued to Zhongkuo Liu in exchange for 75% equity ownership in Plural Capital Company Limited; and (5) on October 19, 2020, 300,000 shares of common stock were issued to Zhongkuo Liu in exchange for the remaining 25% equity ownership in Plural Capital Company Limited.

There are currently 33,928,185 shares of Holistic Asset Finance Group Co., Ltd issued and outstanding Common Shares, 2,083,333 shares of Series A Preferred Shares issued and outstanding, and 1,000 shares of Series L Preferred Shares issued and outstanding.

The authorized capital of the Company is 600,000,000 shares of Common Stock, par value \$0.001, and 10,000,000 shares of Convertible Series A Preferred Stock, par value \$0.001 per share.

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, nor 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 Zoom teleconference, with government issued identification (i.e. People's Republic of China passports) with Mr. Zongkuo Liu, Chief Executive Officer and Director of the Company; Mr. Yan Ciu, Chief Financial Officer of the Company, and Ms. Huei-Ching Huang, Director of the Company;
5. The Company's transfer agent is Issuer Corporate Stock Transfer, located at 3200 E Cherry Creek South Dr., Suite 430, Denver, Colorado 80209-3246, and is registered with the Securities and Exchange Commission. The number of issued and outstanding shares was confirmed to me via email from Corporate Stock Transfer on March 2, 2021;
6. To the best of my knowledge, and pursuant to discussions with management of the Company as well as review of publicly filed documents, as at December 31, 2020, and to date, the Company is not a "shell corporation" 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 Holistic Asset Finance Group Co., Ltd. and have exchanged numerous emails and telephone conversations with corporate management. I have assumed the 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 Holistic Asset Finance Group Co., Ltd and I do not anticipate receiving any in the immediate future.

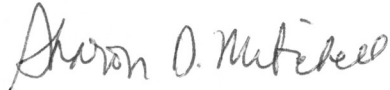
I am not currently, nor have I been in the past five years been the subject of an investigation, hearing, or proceeding by the SEC, the US Commodity Futures Trading Commission (CFTC), the Financial Industry Regulatory Authority (FINRA), or any other federal, state, or foreign regulatory agency.

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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, appearing to read "Sharon D. Mitchell".

Sharon D. Mitchell

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cc: Mr. Zhongkuo Liu, President