

Thomas J. Beener

2244 Farady Avenue
Carlsbad, California 92008

Office: 760-603-1238 Cell: 760-715-0726

Tom.beener.law@gmail.com
www.lawofficethomasjbeener.com

January 31, 2018

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

RE: Oliveda International, Inc (OLVI) / CAVEAT EMPTOR

The Law Office Thomas J. Beener, ("Counsel"), with its principal offices at 2244 Faraday, Carlsbad, CA 92008, serves as counsel to Oliveda International, Inc , OLVI (hereinafter the "Company") and has been retained by the Company for the purposes of posting this letter on the OTC Disclosure and News Service. Pink OTC is entitled to rely upon this letter in determining whether the Company has made adequate current information publicly available within the meaning of Rule 144(c) (2) of the Securities Act of 1933.

Counsel serves as regular securities counsel to the Company. The undersigned attorney is a resident of the United States of America and has been retained by the Company to render this letter and for other matters as well. The undersigned attorney is licensed to practice law in the highest court in the state of California and this letter covers the jurisdiction of the state of California as permitted to practice before the Securities and Exchange Commission and has not been prohibited from practice thereunder.

The OTC Markets Group, Inc. ("OTCMG") is entitled to rely upon the contents of this letter solely for the purpose of determining whether the Company has made adequate current information publicly available within the meaning of Rule 144(c) (2) under the Securities Act of 1933, as amended (the "Act"). OTCMG has full and complete permission and rights to publish this letter with OTC Disclosure and News Service for viewing by the general public and regulators, and OTCMG may rely upon this opinion in determining whether the Company has made adequate current information publicly available within the meaning of Rule 144 (c) (2) of the Act without the prior written consent of Counsel. However, this opinion may not be quoted to, furnished to or relied upon, by any other person, including, without limitation, public investors making their investment decisions, without the prior written consent of Counsel.

In rendering this letter, we have examined the Company's corporate minutes and actions of the Company's Board of Directors and its Shareholders, its Certificate of Incorporation (and any amendments thereto), and its Bylaws (collectively, "the Corporate Documents") and such other documents as deemed necessary or appropriate for purposes of rendering this letter.

We have reviewed the following posted reports (i) Annual Report for period ended 12/31/16 and posted 4/28/17 (ii) Quarterly Report for period ended 3/31/17 posted 5/14/17 (iii) Quarterly Report for period ended 6/30/17 posted 8/25/17 (iv) Quarterly Report for period ended 9/30/17 posted

12/22/17. In my opinion said documents are accurate, up to date and contains the most current information available on the Issuer.

In rendering this letter, Counsel has personally had direct communications with management and with all of the Directors of the Company, has reviewed the Statement published by the Company and personally discussed the Statement with management and all of the Directors of the Company.

In our opinion, the Annual Report and subsequent quarterly reports constitutes adequate current information that is publicly available within the meaning of Rule 144(c)(2) under the Securities Act of 1933 as a result of such Annual Report being posted on the OTC Disclosure and News Service on April 28, 2017 and that the Annual Report includes all of the information that a broker-dealer would be required to obtain from the Company to publish a quotation for all of the Securities of the Company under Rule 15c2-11 under the Securities and Exchange Act of 1934, and that the Annual Report complies as to form with the OTC Pink Basic Disclosure Guidelines.

The party responsible for the preparation of the financial statements is: Hannah Merrill, 1641 N. 400 E. Suite 614, Logan, Utah 84341. (office number 435-881-3611). Ms. Merrill has several years' experience providing accounting and consulting services for publically traded companies. The financial statements have not been audited.

The Company's transfer agent is Action Stock Transfer Corporation, located at 62469 E. Fort Union Blvd., Suite 214, Salt Lake City 84121 which is a registered transfer agent with the Securities and Exchange Commission, Counsel confirmed the outstanding shares set forth in its Annual Report by personally contacting the transfer agent at the transfer agent's office, on January 31, 2018.

Counsel has (i) personally had direct contact with management and a majority of the directors of the Company, (ii) reviewed the Information, as amended, published by the Issuer through the OTC Disclosure & News Service and (iii) discussed the Information with management and a majority of the directors of the Company.

To the best knowledge of this firm, after inquiry of management and the Directors of the Company, neither the Company nor any 5% holder, or the undersigned attorney, is currently under investigation by any Federal or state regulatory authority for any violation of Federal or state securities laws.

This letter is intended to provide sufficient disclosure to enable OTC Markets Group to remove the Caveat Emptor Restriction of the OTC Markets Listing for the Company. According I have attached as Exhibit B additional information in connection with the removal of said restriction and if requested I can provide a copy of the shareholder list to OTC Markets.

First, no officer, director, or control person(s) were engaged in promotional activities. Second, the sole officer and director owns 100,000,000 restricted shares and receives no compensation to date. Third, there are no control persons other than Mr. Lommel. Fourth, except as set forth herein, no officer, director or control person sold shares during the time period at issue or received any compensation. Fifth: I have made specific inquiry of each of the persons listed in connection with Paragraph 14 of

Exhibit B, persons engaged in promotional activities regarding the Issuer and persons owning more than 10% of Securities (collectively, the "Insiders") and based upon such inquiries and other information available to counsel, any sales of the Securities by Insiders within the twelve month period prior to the opinion have been made in compliance with Rule 144, including without limitation any required filings of Form 144 and nothing has come to the attention of counsel indicating that any of the Insiders is in possession of any material non-public information regarding the issuer of Securities that would prohibit any of them from buying or selling the Securities under Rules 10b-5 or 10b-51 under the exchange act.

In summary, no officer, director or control person sold any shares and/or participated in any stock promotion of the Company.

Sincerely,

/s/ Thomas J. Beener

THOMAS J. BEENER, ESQ

OLVEDA INTERNATIONAL, INC

Exhibit B

14

- A) Executive officers and directors: 1) Thomas Lommel, president, ceo, cfo and sole director
2425 Olympic, Blvd, Suite 4000W
Santa Monica, CA 90404
Owns 100,000,000 shares. All shares restricted.

Control persons: None other than Mr. Lommel

B) Consultant/advisor See history attached

None of the above persons have been engaged in stock promotional activities. Neither the Company nor any of its employees, officers or directors have knowledge of any individual or individuals who may have been involved in stock promotional activity. The services for which common restricted shares were issued comprised normal corporate functions.

OLIVEDA INTERNATIONAL, INC TRANSACTIONAL AND CONSULTANT/AFFILIATE HISTORY

January 29, 2018

A. TRANSACTIONAL HISTORY

On May 5, 2016 Heritage Media Corporation agreed to a 3(a)10 court ordered settlement with Emptech Inc. (Chris Lotito), whereby the Heritage agreed to issue up to 25MM free trading shares in the form of common and preferred stock.

On February 21, 2017, the Oliveda International, Inc. entered into a consulting agreement with MXD, Inc. (Chris Lotito) to merge the Company into a US public shell and to provide various consulting services including all required filings, financial reports and IPO documents to raise capital post-merger.

On February 27, 2017, an amendment was filed with the State of Nevada changing the name of the public company to Oliveda International, Inc.

On April 2, 2017, the Nevada corporation issued 100MM shares of restricted stock to Thomas Lommel for 100% of the issued and outstanding shares of Oliveda International, Inc., a Colorado corporation.

On April 7, 2017, Thomas Lommel, as CEO of the Nevada corporation, ordered the issuance of 9MM free trading shares in the form of Series B Convertible Preferred shares to Emptech under the 3(a)10 obligation, assumed in the merger, from its transfer agent, Interwest Transfer.

There have been no further issuances of free trading shares to anyone for any purpose since this transaction.

On May 23, 2017, Emptech entered into stock purchase agreements to sell approximately 4MM shares of its free trading shares for two (2) foreign corporations.

There are no agreements for promotions or any known connection between the public company and these foreign entities.

On December 19, 2017, the Company entered into a Settlement Agreement with Emptech, MXD and Chris Lotito to return 4MM shares (part of the 9MM) of free trading common shares to treasury and the cancelation of all Series B Convertible Preferred Shares.

Additionally, the Company has put a hold on approximately 1.2MM shares of free trading stock held at the new transfer agent, Action Stock Transfer, believed to be owned by one of the foreign entities.

B. CONSULTANT/AFFILIATE HISTORY

During the entire time since its merger, Oliveda International, Inc. has only one (1) director, officer, affiliate or control person, Thomas Lommel.

Since October certain consultants have been retained for cash only to upgrade and prepare the Company's financial statements, for paralegal work, for public relations and the oversight of the administrative activities for the US public vehicle.

These entities are not officers or directors, affiliates or control persons and do not own any shares in Oliveda International, Inc.

The address of Thomas Lommel is:

2425 Olympic Blvd. #4000W
90404 Santa Monica, CA