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July 19, 2019

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

Re: White Label Liquids, Inc.
Opinion of Counsel regarding Adequate Current Information

Dear Sir or Madam:

This firm has acted as legal counsel for **White Label Liquids Inc.** ("**Company**") and has been retained for the purpose of preparing this Opinion of Counsel, applying the applicable laws of the United States, regarding its corporate operations and level of disclosure of corporate information with regard to the Pink OTC Markets Disclosure Guidelines.

In the course of preparing this opinion, counsel has reviewed the following documents relating to the Company (together with the date they were posted through the OTC Disclosure and News Service, if applicable):

PUBLISH DATE	TITLE	PERIOD END DATE
05/16/2019	Quarterly Report - Disclosure Statement	03/31/2019
05/16/2019	Quarterly Report - Financial Statements	03/31/2019
05/15/2019	Notification of Late Filing - Notification of Late Filing	03/31/2019
04/10/2019	Annual Report - Financial Statements	12/31/2018
04/02/2019	Annual Report - Disclosure Statement	12/31/2018
11/13/2018	Quarterly Report - Supplemental Disclosure	09/30/2018
11/13/2018	Quarterly Report - Quarterly Report - Quarterly Report Financials	09/30/2018
10/16/2018	Supplemental Information - Quarterly Report Financials	06/30/2018
10/16/2018	Quarterly Report - Quarterly Report	06/30/2018

Counsel has also examined other related corporate information as necessary and information provided by the Company's management for the purposes of this letter.

Additionally, counsel has personally conferred with Yaron Elkayam, the Company's chief executive officer and a director, to discuss the information contained in the Company's disclosure statements.

The opinions and conclusions contained in this Opinion Letter are based upon documentation and facts made available to this firm and are solely based on the accuracy of those documents and facts. Further, counsel has reviewed all prior disclosures posted by the Company with OTC Disclosure and News Service, as amended and the Company. All such information is believed to be accurate and reliable. In the event that the facts and information in any or all of such documents are determined not to be true, this opinion is rescinded to and to be deemed null and void. Counsel has discussed the above documentation, and the underlying assumptions this firm is relying upon, with the management of the corporation.

The Company has 500,000,000 (Five Hundred Million) authorized common shares and 20,000,000 (Twenty-Five Million) Preferred Shares of which: 62,111,607 shares of common stock and 10,000,000 shares of Preferred shares are issued and outstanding as of the date hereof. The Company's fiscal year end is December 31.

The party responsible for the preparation of the unaudited financial statements of the Company is Vivek Raj Kark. Mr. Kark has been the Company's bookkeeper for two years.

The Company's Transfer Agent is:

Signature Stock Transfer Inc.
14673 Midway Road - Suite 220
Addison, TX 75001

An inquiry to the transfer agent was the source of confirmation of the Company's shares outstanding. Additionally, a search of the SEC's EDGAR system confirmed that Signature Stock Transfer is a registered transfer agent

Further, to inquiry of management and directors of the corporation, to the best of this firm's knowledge, neither the Company nor any person or entity holding at least five percent (5%) of the corporation's stock is currently under investigation by any federal or state regulatory authority for any violation of federal or state securities law.

The Company asserts that it is not now and has never been a shell company as defined in Rules 405 of the Securities Act of 1933 and 12b-2 of the Securities Exchange Act of 1934.

No person or entity other than OTC Markets is entitled to rely upon this opinion. OTC Markets, however, is granted full and complete permission and rights to publish this document via the OTC Disclosure and News Service for viewing by the general public and regulators. The public and OTC Markets Group may rely on the above 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. The information which has been posted via OTC Disclosure and News

Service constitutes adequate current public information, is available within the meaning of S.E.C. Rule 144(c)(2) of the Securities Act, includes all the information that a broker-dealer would be required to obtain from an issuer in order to publish a quotation for its securities pursuant to Rule 15c2-11 under the Securities Exchange Act of 1934, and complies as to form with the OTC Markets Guidelines for Providing Adequate Current Information.

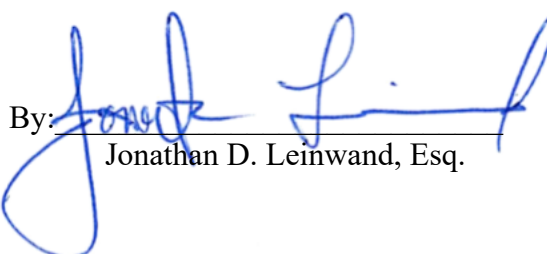
Additionally, we have made an inquiry with regard to the sale and ownership of the Company's securities by the following persons, being all of the persons of the type identified in Item 16 of Exhibit B of OTC Market's Attorney Letter Guidelines:

Name	Position	Address	Common Shares	Date Acquired	Consideration	Legend
Yaron Elkayam	CEO, Director, Owner of more than 5%	475 Carswell Ave Daytona Beach, FL 32117	39,373,464	8/24/17 11/3/17 3/22/18	Compensation as the Company's CEO	Yes

Counsel has made specific inquiry of each of the persons listed above, persons engaged in promotional activities regarding the Issuer, and persons owning more than five percent (5%) of the Company's securities (collectively, the "**Insiders**"), and based upon such inquiries and other information available to counsel, any sales of the Company's securities by Insiders within the twelve-month period prior to the date hereof 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 has made any purchase or sale of the Company's securities based upon 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 10b5-1 under the Exchange Act.

The author of this letter has been admitted to practice in the State of Florida and is resident of the United States. The opinions expressed herein are in reference to the laws of the United States. Counsel is permitted to practice before the Securities and Exchange Commission and has not been prohibited from practice before the Commission, nor has been so at any time during the last 5 years. Counsel is not currently under investigation by any federal or state regulatory authority. Counsel does not own any of the Company's securities and has no agreement to receive any of the Company's securities in the future.

Very Truly Yours,
JONATHAN D. LEINWAND, P.A.

By: 
Jonathan D. Leinwand, Esq.