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October 28, 2015

Mr. Brian Weber
Bebida Beverage Company
125F Trade Court #9
Mooresville, NC 28117

/and

Alpine Securities
39 S. Exchange Pl
Salt Lake City, UT 84111

Re: Bebida Beverage Co.

Gentlemen:

I have been asked to render an opinion for Bebida Beverage Co., a Wyoming corporation, hereinafter referred to as the Company, with respect to whether the Company is a shell or has been a shell in the past twelve months.

I have reviewed the Company's "Annual Report" as posted on the OTC Disclosure & News Service on December 31, 2014 as well as prior reports, which contain a chronology of the Company's history as follows:

1. The Company was incorporated in the state of Wyoming and is not a reporting company under the 1934 Securities Act;
2. A company, Renovo Holdings Inc. (a Nevada corporation underwent a name change on 9/3/08 to Bebida Beverage Company. (**Addendum #1**)
3. On 11/26/08, Bebida Beverage Company was formed in Wyoming as a new entity. (**Addendum #2**) Public shareholders of the Nevada Corporation were given a one-to-one share exchange and registered with FINRA at this time Bebida Beverage Company Nevada became a subsidiary of Bebida Beverage Company a Wyoming corp. (**Addendum #3**) therefore a preexisting 2007 shell status does not attach to the Wyoming Corp.
4. In October 2009 Bebida Beverage Company (Nevada entity) was then dissolved.
5. On August 21 2009 Hudson County NJ (HUD-C-11-9) YA Global Investments VS Bebida Beverage Company a default judgment was entered for a outstanding debt. The judge ordered that publicly traded stock from the company be issued to satisfy the debt. However in September 2009 during the appeal process the Honorable Thomas P. Olivieri *set aside* the judgment as invalid as the case was brought against the Bebida Beverage Corporation (Nevada) at that point a non-publically traded corporation and subsidiary of the Wyoming corp.
6. The Company began its beverage operation in 2008 as Bebida Beverage Company a Wyoming company and continues today.
7. The company has been actively involved in the beverage business since 2008.

8. In the Company's prior annual reports in has asserted its non-shell status from its inception in 2008.
9. The Company, in its most recent Quarterly Report (third quarter 2015), states assets of over \$675,000.00 and a review of prior financial statements indicates a continuing trend of above nominal operations and assets.

Rule 144(i) defines a shell company as a company that is now or at any time previously has been an issuer that has:

- (A) No or nominal operations; and
- (B) Either:
 - 1 No or nominal assets;
 - 2 Assets consisting solely of cash and cash equivalents; or
 - 3 Assets consisting of any amount of cash or cash equivalents and nominal other assets.

Based on the aforesaid representation of Rule 144(i)(1) definition of a shell company, I have not been able to verify that the Company has at any time since its formation as a Wyoming Corporation in 2008, has operated with: (a) no or nominal operations; and (b) no or nominal assets of cash.

Legal Opinion

Therefore, based upon the aforesaid representation of the Company, it is my opinion that:

As to matters of fact, I have relied upon the aforesaid representations, including documentation of said facts supplied and executed by the then sole owner of Bebida Beverage Co. that the company is not a shell company and has not been a shell company since its formation as a Wyoming Corporation in 2008. I have made no independent attempt to verify the above facts set forth herein, and this opinion is limited to, and upon, the accuracy of the facts stated herein but have relied upon the Company's assurances.

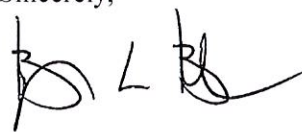
From my research of the history of this Company from its inception in 2008 until the present, I have found no definitive evidence to support the conclusion that the Company ever acted as a blank check or shell company since 2008. These findings, or lack thereof, are supported by a written statement dated October 28, 2015, by Brian Weber, CEO of the Company.

In rendering the opinion, I have assumed without independent verification the following: (i) All signatures on documents I have examined in connection herewith are genuine, each signor is an authorized signor, all items submitted to me as originals are originals, and all documents submitted to me as copies conform with the originals; and (ii) all factual matters, each of the representations, warranties or statements in the aforementioned documents is true, accurate and complete in all material respects; and (iii) the parties are acting in good faith and without the intention to circumvent any securities laws. The law covered by the opinions expressed herein is limited to U.S. federal law.

In Re: Bebida Beverage Co.
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You are entitled to rely upon this letter in determining whether Bebida Beverage Co. is now or has ever been a "shell company/issuer" as provided in Rule 144(i) of the 1933 Act. You have full and complete permission to deliver this letter and attachments to your legal counsel. This letter may not be relied upon by you for any other purpose, or relied upon by any other person, firm, corporation, or other entity for any purpose, without my prior written consent.

Sincerely,

A handwritten signature in black ink, appearing to read "BLB", with a stylized flourish extending to the right.

Benjamin L. Bunker, Esq.

BLB

I hereby represent that the foregoing facts set forth in the above opinion are true and accurate.

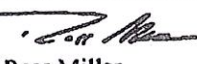
Bebida Beverage Co.

By: 
Brian Weber, CEO



ROSS MILLER
 Secretary of State
 204 North Carson Street, Ste 1
 Carson City, Nevada 89701-4299
 (775) 684 6768
 Website: www.nvsos.gov

#1

Filed in the office of  Ross Miller Secretary of State State of Nevada	Document Number 20080589829-51
	Filing Date and Time 09/03/2008 2:55 PM
	Entity Number C27932-2000

Certificate of Amendment
 (PURSUANT TO NRS 78.385 AND 78.390)

USE BLACK INK ONLY - DO NOT HIGHLIGHT

ABOVE SPACE IS FOR OFFICE USE ONLY

**Certificate of Amendment to Articles of Incorporation
 For Nevada Profit Corporations**
 (Pursuant to NRS 78.385 and 78.390 - After Issuance of Stock)

1. Name of corporation:

Renovo Holdings

2. The articles have been amended as follows: (provide article numbers, if available)

The name of the company shall be changed from Renovo Holdings to Bebida Beverage Company.

The authorized common shares shall be reduced from 4,900,000,000 (four billion nine hundred million) to 2,000,000,000 (two billion) shares of \$0.001 par value stock.

Preferred at \$5,000,000 to remain unchanged

3. The vote by which the stockholders holding shares in the corporation entitling them to exercise a least a majority of the voting power, or such greater proportion of the voting power as may be required in the case of a vote by classes or series, or as may be required by the provisions of the articles of incorporation* have voted in favor of the amendment is: Majority

4. Effective date of filing: (optional)

September 25, 2008

(must not be later than 90 days after the certificate is filed)

5. Signature: (required)

X *Ross Miller*
 Signature of Officer

*If any proposed amendment would alter or change any preference or any relative or other right given to any class or series of outstanding shares, then the amendment must be approved by the vote, in addition to the affirmative vote otherwise required, of the holders of shares representing a majority of the voting power of each class or series affected by the amendment regardless to limitations or restrictions on the voting power thereof.

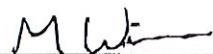
#2

**ARTICLES OF INCORPORATION
OF
Bebida Beverage Company**

- I. The name of the corporation is: **Bebida Beverage Company**
- II. The number of shares which the Corporation is authorized to issue that together have unlimited voting rights is 2,000 shares of common stock, all of one class, which are also entitled to receive the net assets of the Corporation upon dissolution. The par value of the authorized shares is one cent (\$0.01) par value.
- III. The registered agent and street address of the Corporation registered office are:

Business Filings International, Inc., 1720 Carey Ave., Cheyenne, Wyoming 82001.
Located in the County of Laramie.
- IV. The principal place of business and mailing address of this corporation shall be: 1081 S. Cimarron B5, Las Vegas, Nevada 89145
- V. The name and address of the incorporator is Business Filings Incorporated, 8040 Excelsior Dr., Suite 200, Madison, WI 53717.

Dated: November 25, 2008


Business Filings Incorporated, Incorporator
Mark Williams, A.V.P.



For name availability purposes, the type of business the Corporation will be conducting is: All Lawful Business

BEBIDA BEVERAGE COMPANY
1081 S. Cimarron
#B5
Las Vegas, Nevada 89145

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Corporate Resolution For Change of Domicile and Subsidiary

The undersigned, along with a majority and outstanding shares of Bebida Beverage Company, a Nevada Corporation (the "Corporation"), consents in writing as of November 19, 2008 to the following actions, and directs that a Resolution be written. This Resolution is to be filed by the corporation's secretary with the minute proceedings of the shareholders.

WHEREAS, the Corporation has determined that it is in the best interest of the Corporation and the shareholders to change the domicile of the Corporation from Nevada to Wyoming; and

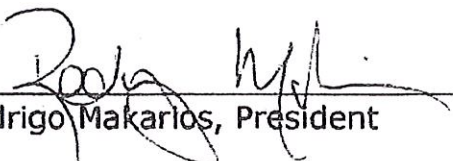
WHEREAS, the Corporation has determined that it wishes to maintain the Nevada Corporation, which shall be a subsidiary of the Wyoming parent Corporation of the same name, it is hereby:

RESOLVED, that the Corporation has authorized the change of domicile of the Corporation to Wyoming. Be it further

RESOLVED, that the Nevada Corporation shall continue as a subsidiary of the parent Corporation, Bebida Beverage Company domiciled in Wyoming.

RESOLVED, that the officer of this corporation is directed to execute documents and take other actions necessary to establish and issue the shares listed above.

IN WITNESS WHEREOF, the undersigned being the director of Bebida Beverage Company has executed this consent as the day and year first written above.



Rodrigo Makarios, President