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

September 30, 2020

Re: Legal Opinion for Kimberly Parry Organics Corp.

Dear Sir or Madam:

This letter is in response to the request that we express our opinion as to the accuracy and current nature of information provided by Kimberly Parry Organics Corp., (“KPOC” or “the Issuer”). This opinion letter is intended only to be relied on by OTC Markets Group in determining whether the Issuer has made adequate current information publicly available within the meaning of Rule 144(c)(2) under the Securities Act of 1933. Accordingly, we grant OTC Markets Group full and complete permission and rights to publish this letter through their OTC Disclosure and News Service for viewing by the general public and requisite regulators.

In connection with the rendering of this opinion, we have investigated such matters and examined such corporate records and other documents as we deemed necessary and relevant as a basis for the opinion hereinafter set forth. This opinion is expressed solely on the facts and assumptions set forth herein and is specifically limited to the investigation and examinations stated.

In our examination of the documents, we have assumed the genuineness of all signatures, the legal capacity of all natural persons, authenticity of documents submitted to us as originals, the conformity with originals of all documents delivered as copies, and the correctness of the facts set forth in such documents when the facts were found to be outside the scope of our examination. For the purposes of rendering this opinion, we have assumed that no person or entity has engaged in fraud or misrepresentation regarding the inducement relating to, or the execution or delivery of, the documents reviewed. Furthermore, we express no opinion as to the validity of any of the assumptions, form, or content of any financial or statistical data contained therein. We have gathered and relied on information obtained from public records, officers of the Issuer, and other sources. We also find the following documents, due to their nature and source, to be self-authenticating: certified records of regularly conducted foreign and domestic business activity, public records and reports, domestic public documents under seal, foreign public documents, official publications, and other acknowledged documents.

We acknowledge that the Issuer has provided an annual report and financial statements for the period ended August 31, 2019 published on September 23, 2020, as well as the quarterly reports and financial statements for periods ended November 30, 2019, February 28, 2019, and May 31,

2020, also published on September 23, 2020. Collectively, all reports are referred to as the “Issuer’s Filings”. In our opinion, the Issuer’s Filings.:

- (i) constitutes “adequate current public information” concerning the securities of the Issuer and “is publicly available” within the meaning of Rule 144(c)(2) under the Securities Act of 1933;
- (ii) 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 Securities Exchange Act of 1934 (the “Exchange Act”);
- (iii) complies as to form with the OTC Markets Group Guidelines for Providing Adequate Current Information, which is available at: <http://www.otcmarkets.com/content/doc/DisclosureGuidelines.pdf>; and
- (iv) has been posted on the OTC Disclosure and News Service.

We further opine that the filings made for the period ended August 31, 2018 were in compliance with previous reporting standards of OTC Markets Group prior to March 15, 2019.

In our review, we have been cautious to the presence of any information that reasonably indicates the existence of material inaccuracies or any information that would indicate the source of the materials to be unreliable. We cross-referenced the documents listed on the OTC Disclosure and News Service with other documents and information made available to us, as well as with other information we obtained independently from outside sources. Through the exercise of reasonable diligence, nothing came to our attention during the course of the examination that led us to believe that any documents presented to us were not genuine or authentic or that the facts set therein were untrue.

The Issuer’s Filings disclosed by the Issuer for the year ended August 31, 2019 and the subsequent quarterly filings have been prepared by Richard Edelson. Mr. Edelson is the founder of Get OTC Current. He has over 20 years of experience in accounting for hedge funds and their portfolio companies. Mr. Edelson was the CFO and Director of Due Diligence for Royal Bank of Canada’s Alternative Asset Management practice and The Laurus Family of Funds. While at RBC he was responsible for all the finance, accounting, due diligence, and investor relations functions of the organization, including activities such as billing, invoicing and investor reporting to more strategic initiatives such as financial analysis, and price modeling. During his time there, Mr. Edelson helped grow the net assets from \$27 million to \$1 billion. Prior to that, Mr. Edelson gained experience with a number of organizations. He held financial management positions with a variety of companies including Bricolage Capital which specialized in FX currency hedging, The Blackstone Group, and UBS Warburg. Mr. Edelson holds a BS in accounting from Long Island University. As we are unaware of the person who prepared the financial statements disclosed by the Issuer prior to Mr. Edelson, we cannot verify the qualifications of the party providing any financial statements disclosed by the Issuer prior to May 28, 2019.

The Issuer’s Transfer Agent is Pacific Stock Transfer located at 6725 Via Austi Pkwy, Suite 300 Las Vegas, NV 89119. Pacific Stock Transfer is a registered Transfer Agent with the Securities and Exchange Commission. A shareholders list provided by the Transfer Agent as of June 21,

2019 was cross-referenced with the other information provided to us by the Issuer to determine the number of outstanding shares set forth in the Information and Disclosure Statement.

We have personally met, via video teleconference, with the Issuer's CEO and Director, Theodore Collas, and have had numerous correspondences with the Issuer's management and director. We have also reviewed the information published by the Issuer through the OTC Disclosure and News Service and discussed the contents of the information with the Issuer's management and directors. We have not discovered any instances that would indicate that any officer, director, 5% holder, or counsel of the Issuer is currently under investigation by any governmental authority for violation of federal or state securities law.

It is our opinion that the information contained in documents the Issuer has listed on the OTC Disclosure and News Service satisfies the requirements of OTC Markets. Accordingly, based on our review, it is our opinion that there is reasonable basis to support the belief that the information provided by KPOC is current and accurate, the sources of the aforementioned information are reliable and otherwise in compliance with the requirements of Rule 15c2-11 and OTC Markets Group's Guidelines for Providing Adequate Current Information.

The Issuer has filed its continuing disclosure obligations with OTC Markets since November 2012. The Issuer was incorporated in the State of Nevada, as Easy CD Yearbook, Inc. on June 27, 2006; became VizStar, Inc. on October 26, 2009; and merged into its Utah subsidiary on February 2, 2010. In April 2014, the Issuer changed its name to Kimberly Parry Organics Corp. In 2014 the Issuer acquired 60% of KP Products, Inc., and the Issuer's management changed its focus to a business plan that included the acquisition of companies and products in the organic cosmetic, wellness and skincare space. On September 1, 2016, the Company agreed to issue, over a six-month period, 4,250,000 restricted common shares for the acquisition of Pal Business Holdings, Inc., recorded at \$170,000. Pal Business Holdings, Inc., was acquired on September 1, 2016 to replace KP Products, Inc. as the operating facility. The Issuer is currently focused on the manufacture of its own product lines and on the acquisition of companies that are USDA Certified Organic and possessing both patents and product distribution. The Issuer listed \$0 total assets as of fiscal year ended August 31, 2018, and as of February 28, 2019 had \$0 in total assets as of the date of this opinion. Furthermore, there is no indication of ongoing operations as may often be reflected in other aspects of the financial statements, such as revenues or expenses related to actual operations.

In reviewing the current financial statements and the representations of management of the Issuer, we have determined that there is factual evidence of a lack of operations and assets of the Issuer. Therefore, the Issuer is currently a "shell company" as defined in Rule 405 of the Securities Act of 1933 and 12b-2 of the Exchange Act of 1934.

This opinion letter is based on our knowledge of the law and facts as of the date hereof. This letter has been drafted based upon our interpretation of the laws of the United States and the rules and regulations promulgated by the Securities and Exchange Commission of the United States. We assume no duty to communicate with you with respect to any matter that comes to our attention hereafter this Opinion Letter is filed. We have been retained by KPOC for the purposes of reviewing the current information supplied by the issuer and to express our opinion as to the

accuracy and current nature of information in relation to filing of current unaudited financials and disclosures by the Issuer.

The undersigned owns no shares of the Issuer. The undersigned has not received, nor has any agreement to receive in the future, shares of the Issuer's stock as payment for any services rendered.

The undersigned is a resident of Asheville, North Carolina. The undersigned is authorized to practice law in the State of Florida, the District of Columbia, and the United State of America. The undersigned is permitted to practice before the Securities and Exchange Commission and has never been barred from practice in any of the foregoing jurisdictions.

Thank you for your time and attention.

Sincerely,

A handwritten signature in blue ink, appearing to read 'W. Robinson Eilers', with a large, stylized flourish extending to the right.

William Robinson Eilers, Esq.