

MORGAN E. PETITTI
ATTORNEY AT LAW
118 W. STREETSBORO ROAD
317
HUDSON, OHIO 44236

TELEPHONE: 330.697.8548

E-Mail: PetittiLaw@gmail.com

March 29, 2024

OTC Markets Group Inc.
300 Vesey Street, 12th Floor
New York, New York 10282

Re: Favo Capital, Inc., a State of Nevada corporation (the “Company” or “Issuer”).

Subj.: Letter with Respect to Adequate Current Information for the Issuer: Annual Report for the Year Ended December 31, 2023.

Dear Ladies and Gentlemen:

I write to provide the OTC Markets Group Inc. with an opinion with respect to the Company. OTC Markets Group Inc. is entitled to rely on such opinion in determining whether to permit quotations in the Issuer’s securities (the “Securities”) in the OTC Markets Group Inc. quotation venue and in deciding whether the Issuer has made adequate current information publicly available within the meaning of Rule 144(c)(2) under the Securities Act of 1933, as amended (the “Securities Act”).

I am a U.S. resident and I have been retained by the Issuer solely for the purpose of reviewing the current information supplied by the Issuer. I do not own any shares of the Issuer’s securities and will not receive any shares of the Issuer’s securities as payment for services rendered, currently or in the future.

I have examined such corporate records, e.g. Articles of Incorporation, Bylaws, corporate minutes and other documents and such questions of law as I have considered necessary or appropriate for purposes of rendering this letter. I am authorized to practice law in the State of Ohio, including the laws of the United States. I am permitted to practice before the Securities and Exchange Commission (the “Commission”) and have not been prohibited from practice thereunder.

I am not currently and have not been in the preceding five (5) years, suspended or barred from practicing in any state or jurisdiction, or charged in a civil or criminal case. I am not currently and have not been in the preceding five (5) years, subject of an investigation, hearing, or proceeding by the Commission, the U.S. Commodity Futures Trading Commission (“CFTC”), the Financial Industry Regulatory Authority (“FINRA”), or any other federal, state, or foreign regulatory agency.

On March 29, 2024, the Issuer posted on the OTC Disclosure and News Service its Annual Report for the year ended December 31, 2023, prepared in accordance with Rule 15c2-11(a)(5) promulgated under the Securities and Exchange Act of 1934 (the “Exchange Act”). I have reviewed all such documents (the “Information”) in connection with the preparation of this letter and find them to be suitable for public disclosure.

It is my belief that the Information (i) constitutes “adequate current public information” concerning the Securities and the Issuer and “is available” within the meaning of Rule 144(c)(2) under the Securities Act, (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 Exchange Act, (iii) complies as to form with the OTC Markets Group Inc. Guidelines for Providing Adequate Current Information, which are located on the Internet at www.otcmarkets.com, and (iv) has been posted on the OTC Disclosure and News Service.

The opinion and conclusions herein are based upon documentation and facts made available to me by the Company and are based on the accuracy of those documents and facts. The documentation that was provided to me was believed to be true and reliable in its contents. Below is the information posted to the OTC Disclosure and News Service on March 29, 2024, which I have reviewed in rendering this opinion:

1. Annual Report for the year ended December 31, 2023.
2. Balance Sheet as of the years ended December 31, 2023 and 2022 (Unaudited).
3. Statement of Operations for the years ended December 31, 2023 and 2022 (Unaudited).
4. Statement of Stockholders’ Deficit for the years ended December 31, 2021 through 2023 (Unaudited).
5. Statement of Cash Flows for the years ended December 31, 2023 and 2022 (Unaudited).
6. Notes to Financial Statements (Unaudited).

I personally met with Vincent Napolitano, CEO, Director and Beneficial Shareholder of the Issuer, and Shaun Quin, President and Director of the Issuer, to discuss and review the above documentation. In the event that the facts and information in all such documents are determined not to be true, this opinion shall be null and void.

The party responsible for preparation of the financial statements of the Issuer is:

Mario A. Beckles, CPA
Beckles & Co.
400 Columbia Drive, Suite101
West Palm Beach, Florida 33409
Phone: 561.689.4093

The Transfer Agent for the Issuer is:

Clear Trust, LLC
16540 Pointe Village Drive, Suite 210
Lutz, Florida 33558
Phone: 813.235.4490
Fax: 813.388.4549
Email: inbox@cleartrusttransfer.com

The Transfer Agent is listed with the Commission and also has Depository Trust Corporation approval. As of December 31, 2023, there were 87,554,734 shares of Common Stock issued and outstanding of the Issuer. The Company's Transfer Agent was the source of confirmation of the common shares outstanding of the Issuer, via email on March 24, 2024.

To the best of counsel's knowledge, after inquiry of management and the directors of the Issuer, neither the Issuer, nor counsel or any 5% holder is currently under investigation by any federal or state regulatory authority for any violation of federal or state securities law.

The Company was incorporated as Beeston Enterprises Ltd. on July 12, 1999 under the laws of the State of Nevada. The Company changed its name to Favo Realty, Inc. on January 9, 2019 and Favo Capital, Inc. in March of 2021. As Beeston Enterprises Ltd. the Company was an exploration stage company engaged in the search of mineral deposits that could be developed to a state of a commercially viable producing mine.

Currently, the Company operates as a direct funding company that provides customized, short-term funding to small and midsize businesses nationwide. Favo Realty operates as the real estate investment portion of the Company, investing in a diversified portfolio of quality commercial real estate properties and other real estate investments located throughout the United States.

The Company did not file public information with the Commission or OTC Markets Group, Inc. until October of 2018 and previously designated itself as a "shell company" as defined in Rules 405 of the Securities Act of 1933 and 12b-2 of the Exchange Act of 1934.

Additional information regarding the business operations of the Company may be viewed at its corporate website, www.favocapital.com. As of December 31, 2023, the Company reported total assets valued at \$19,638,628.00 and revenue of \$6,542,320.00. Therefore, I do not believe the Company is currently a "shell company."

The OTC Markets Group Inc. is entitled to rely on the opinion set forth hereinabove when determining whether to permit quotations in the Issuer's Securities in the OTC Markets Group Inc. quotation venue and the OTC Markets Group Inc. is hereby granted permission to post this letter on the OTC Disclosure and News Service for viewing by the public and regulators. However, this letter and the opinions set forth herein may not be quoted in whole or in part, relied upon by any other person or entity, filed with any government agency or otherwise referred to or utilized for any other purpose, without, in each instance, my prior written consent.

Respectfully submitted,



Morgan E. Petitti, Esq.