



Reply to the Attention of	Michael H. Taylor
Direct Line	604.691.7410
Email Address	michael.taylor@mcmillan.ca
Our File No.	57683V-0001
Date	May 13, 2021

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

Dear Sir/Madam:

Re: United Communications Partners Inc. (the "Company") - Annual Qualification Letter

This firm ("McMillan", "we" or "us") serves as disclosure counsel for the Company and has been retained by the Company for the purpose of issuing this Annual Qualification Attorney Letter in connection with the continued qualification of the Company's common stock (the "Securities") as OTC Pink Current Information on the OTC Markets. The Company was previously a "shell company" as defined in Rule 144. This letter is rendered solely to OTC Markets Group, Inc. in connection therewith, may be relied upon solely by OTC Markets Group, Inc. 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*, and may not be relied upon by any other person or for any other purpose without our prior written consent. This letter may be published through the OTC Disclosure & News Service.

McMillan is a Canadian law firm, that is registered with OTC Markets as a DAD and Pal Advisor. The undersigned member of the Firm working with the Company (i) is licensed to practice law in the State of Nevada, (ii) is licensed to practice law in the Province of British Columbia, Canada, and (iii) is permitted to practice before the Securities and Exchange Commission (the "SEC") and has not been prohibited from practice thereunder. We confirm that we are not relying upon the work of any other law firm or legal counsel in connection with the due diligence inquiry and review of the statements and representations of the Company and the preparation of this letter. No partner or employee of McMillan is an employee, officer or director of the Company. McMillan has not received and is not party to any agreement to receive in the future, shares of the Company's common stock as payment for any services. McMillan has been engaged to provide this letter as outside legal to the Company. The undersigned does not own any shares of the Company's common stock. The undersigned is licensed to practice law in the State of Nevada and in the Province of British Columbia. This letter relates solely to the application of the *Securities Act of 1933*, as amended (the "Securities Act") and the *Securities Exchange of 1934*, as amended, (the "Exchange Act") to the Company under the laws of the United States.

In connection with this letter, we have reviewed the documents made available on the OTC Disclosure and News Service, and such other corporate records, certificates of officers, certificates of public officials, and other documents and instruments and such questions of law as we have considered necessary or appropriate to require as a basis for the determination expressed herein, including the following, all of which were posted to otcmarkets.com via otcicq.com (the "OTC Web Site") on the date indicated below (the "Disclosure Information"):

1. 2020 Annual Report – Officer/Director Disclosure Statement Annual Report for the year ended December 31, 2020, dated April 15, 2021 and posted on to the OTC Web Site on April 15, 2021;
2. 2020 Annual Report – Annual Report for the period ended December 31, 2020, dated April 15, 2021 and posted on to the OTC Web Site on April 19, 2021;
3. 2020 Q3 – Quarterly Report for the quarter ended September 30, 2020, dated November 14, 2020 and posted on to the OTC Web Site on November 14, 2020;
4. 2020 Q3 – Officer/Director Disclosure Statement for the quarter ended September 30, 2020, dated November 17, 2020 and posted on to the OTC Web Site on November 16, 2020;
5. 2020 Q2 – Quarterly Report for the quarter ended June 30, 2020, dated August 14, 2020 and posted on to the OTC Web Site on August 14, 2020;
6. 2020 Q2 – Officer/Director Disclosure Statement for the quarter ended June 30, 2020, dated August 14, 2020 and posted on to the OTC Web Site on August 14, 2020;
7. 2020 Q1 – Quarterly Report for the quarter ended March 31, 2020, dated May 15, 2020 and posted on to the OTC Web Site on May 18, 2020; and
8. 2020 Q1 – Officer/Director Disclosure Statement for the quarter ended March 31, 2020, dated May 18, 2020 and posted on to the OTC Web Site on May 18, 2020.

For purposes of this letter, we have assumed (i) the genuineness of all signatures and the authenticity and completeness of all corporate records, certificates of officers, certificates of public officials, and other documents and instruments submitted to us as originals; (ii) the conformity to authentic originals of all corporate records, certificates of officers, certificates of public officials, and other documents and instruments submitted to us as certified, conformed, photocopy or facsimile copies thereof; and (iii) the accuracy and adequacy of the disclosures made to us by the Company, the Company's management and the Company's board of directors including, without limitation, the Disclosure Information and the financial information released by the Company.

Subject to the qualifications and assumptions set forth above, the Disclosure Information: (i) constitutes "adequate public information concerning the securities of the Company 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 Company to publish a quotation for the securities of the Company under Rule 15c2-11 under the Exchange Act; (iii) complies in material respects as to form with the OTC Market Group's OTC Pink Sheet Disclosure Guidelines which are on the Internet at www.otcmarkets.com: and (iv) has been posted through the OTC Disclosure and News Service.

The Company's Financial Statements for the period ending December 31, 2020 which are not audited and have been included in the Annual Report prepared by or under the supervision of its Chief Executive Officer and the Company's Board of Directors. They have been assisted in this

task by Anna-Karin Darlin, the Company's CFO. Ms. Darlin is familiar with all aspects of Accounting and Financial Management (including reporting and Cash Management), Risk Assessment and Internal Control's (SOX), US GAAP and SEC reporting, Procurement Strategies, BPR and Change Management.

The Company's stock transfer agent is VStock Transfer, LLC of 18 Lafayette Place, Woodmere, NY 11598. The transfer agent has confirmed that they are registered with the Securities and Exchange Commission. The number of shares of the Securities outstanding as set forth in the Disclosure Information was derived from a shareholder list dated effective December 31, 2020, and obtained from the transfer agent, and corporate records subsequent thereto.

We have (i) discussed the Company's Disclosure Information via telephone conference with members of the Company's management and directors, including Mr. Froberg (Chairman of the Board) and Ms. Darlin, and (ii) reviewed the Disclosure Information, as amended, published by the Company through the OTC Disclosure and News Service. Management confirmed the accuracy of the Disclosure Information and that the certificate attached to the Annual Report remained true and correct as at May 5, 2021.

To the best of our knowledge, after inquiry of management and the directors of the Company, neither the Company, nor any 5% or more holder of the Company's common stock or counsel is currently under investigation by any federal or state regulatory authority for any violation of federal or states securities laws.

The Company has previously been a "shell company" as defined in Rules 405 of the Securities Act and 12b-2 of the Exchange Act prior to the acquisition of its current business operations.

The undersigned counsel is a partner in McMillan LLP and is not currently, or has not been in the past five years, (i) the subject of an investigation, hearing, or proceeding by the SEC, the U.S. Commodity Futures Trading Commission (CFTC), the Financial Industry Regulatory Authority (FINRA) or any other federal, state or foreign regulatory agency, (ii) suspended or barred from practicing law in any state or jurisdiction, or (iii) charged in a civil or criminal case. Further, the undersigned counsel is permitted to practice before the Securities and Exchange Commission and has not been prohibited from practice thereunder.

Yours truly,

McMillan LLP

/s/ Michael H. Taylor

Per: Michael H. Taylor*

**Called to the Bar in the State of Nevada*