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OUR FILE NO.:

February 14, 2022

Issuer Services
OTC Markets Group, Inc.
304 Hudson Street
New York, New York 10013

RE: Sutimco International Inc., a Wyoming corporation (“Issuer”)
Annual report ending December 31, 2019 and 2020.

To Whom This May Concern:

This firm is legal counsel for the Issuer that hereby submits this letter regarding the Issuer’s Annual financials and disclosures for the periods ending December 31, 2019 and 2020, along with the financials and disclosures for the interim periods ending March 31, 2021, June 30, 2021, and September 30, 2021.

1. OTC Markets Group, Inc. is entitled to rely on this letter in determining whether the Issuer has made current information publicly available within the meaning of Rule 144(c)(2) under the Securities Act of 1933.

2. I am a United States resident. This law firm has been retained by the Issuer for the special purpose of rendering this letter and other related matters, including serving as counsel retained solely for the purpose of reviewing the current information supplied by the Issuer. Counsel does not beneficially own any shares of the Issuer’s securities. Moreover, Counsel has not received, and has no agreement to receive in the future, shares of the Issuer’s stock in payment for services.

3. I have examined such corporate records and other documents and such questions of law as I considered necessary or appropriate for purposes of rendering this letter. In particular, I have reviewed the following:

The issuer’s Q3 Quarterly Report for the period ending September 30, 2021, published on November 11, 2021:
<https://www.otcm Markets.com/otcapi/company/financial-report/310732/content>

The issuer’s Q2 Quarterly Report for the period ending June 30, 2021, published on September 21, 2021:
<https://www.otcm Markets.com/otcapi/company/financial-report/303436/content>

The issuer's Q1 Quarterly Report for the period ending March 31, 2021, published on September 1, 2021:
<https://www.otcmarkets.com/otcapi/company/financial-report/300279/content>

The issuer's Q4 Annual Report for the period ending December 31, 2020, published on September 1, 2021:
<https://www.otcmarkets.com/otcapi/company/financial-report/300277/content>

The issuer's Q4 Annual Report for the period ending December 31, 2019, published on July 7, 2021:
<https://backend.otcmarkets.com/otcapi/company/financial-report/290735/content>

The issuer's information and identification of its officers as posted online at the Wyoming Secretary of State at
<https://wyobiz.wyo.gov/Business/FilingDetails.aspx?eFNum=069167253069047076105039056075216227040057012139>.

4. I am authorized to practice law in the state of California. This letter also applies to and includes all the laws of the United States of America and all jurisdictions therein. This letter does not rely on the work of other counsel.

5. I am permitted to practice before the United States Securities and Exchange Commission (the "SEC") and have not been prohibited from practicing thereunder. This Counsel has never been the subject of any 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.

6. I have not been barred or suspended from practice in any state or jurisdiction, nor have I been charged in any civil or criminal case.

7. As to matters of fact, I have relied on information obtained from public officials, officers of the Issuer and other sources and all such sources are believed to be reliable. In my examination, I have assumed the genuineness of all signatures on all documents, the legal capacity of all natural persons, the authenticity of all documents submitted to us as originals, the conformity to original documents of all documents submitted to us as photostatic copies, and the authenticity of the originals of such latter documents.

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8. I have reviewed the Issuer's Annual Report disclosure and financial documents, along with the footnotes for the period ended December 31, 2020 (and all documents as listed in paragraph 3 above), and it is my opinion that said documents are accurate, up to date, and contain the most current information available on the Issuer.

9. The information referred to above (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 require 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 Inc.'s Guidelines for Providing Adequate Current Information, which are located on the Internet at www.otcmarket.com, and (iv) has been posted through the OTC Disclosure and News Service.

10. The person responsible for the preparation of the financial statements and other disclosures is Edward Vakser. Mr. Vakser is the issuer's CFO with many years of experience in preparing financials for public companies.

11. The Issuer's transfer agent is Signature Stock Transfer, 14673 Midway Road, Suite 220, Addison, TX 75001, (972) 612-4120. The transfer agent is registered with the SEC. I have confirmed the number of outstanding shares in the information by reviewing the shareholder list and/or communicating with said transfer agent.

12. I have personally met and discussed with management and officers of the Issuer (Edward Vakser), (ii) reviewed the Information, as amended, published by the Issuer through the OTC Disclosure and News Service and (iii) discussed the information with its management and a majority of the Issuer's directors.

13. To the best of my knowledge, after inquiry of management and the directors, neither the Issuer, any 5% shareholder, nor counsel is under investigation by any federal, or state regulatory authority for any violation of federal or state securities laws.

14. This letter is given solely to you, and may not be released to or relied upon by, nor is it intended to benefit, any other person or for any other purpose without our prior written consent; provided, however, OTC Markets Group, Inc., has full and complete permission to publish this letter through the OTC Disclosure and News Service for viewing by the public and regulators.

15. Based on the information published by the Issuer via the OTC Disclosure and News Service, and after inquiry with the issuer's management and directors, the issuer is not a "shell company" as defined in Rules 405 of the Securities Act of 1933 and 12b-2 of the Exchange Act of 1934.

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Feel free to contact me if you require any additional information. Thank you.

Very truly yours,

LAW OFFICE OF MARK H. CHEUNG

A handwritten signature in blue ink, appearing to read 'M. H. Cheung', with a large, sweeping flourish extending to the right.

Mark H. Cheung

cc: Sutimco International Inc.
& its CEO and Board of Directors