

MORGAN E. PETITTI

ATTORNEY AT LAW

118 W. STREETSBORO STREET
SUITE 317
HUDSON, OHIO 44236

TELEPHONE: 330. 697.8548

E-Mail: PetittiLaw@gmail.com

June 16, 2023

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

Re: Holiday Island Holdings, Inc., a State of Delaware corporation (the "Company" or "Issuer").

Subj.: Letter with Respect to Adequate Current Information for the Issuer: Annual Report for the Period Ended December 31, 2022.

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 31, 2023, the Issuer posted on the OTC Disclosure and News Service its Annual Report for the year ending December 31, 2022, 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 31, 2023 which I have reviewed in rendering this opinion:

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

I personally met with S. Gene Thompson, CEO and Director of the Issuer, to discuss and review the above documentation with management of the Issuer and with a majority of the Board of Directors. 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:

Michael Richard, Accountant
8136 Pawtucket Drive
Huntington Beach, California 92646
Phone: 714.318.4751
Email: m.richard.cfo@gmail.com

The Transfer Agent for the Issuer is:

Pacific Stock Transfer
6725 Via Austi Parkway, Suite 300
Las Vegas, Nevada 89119
Phone: 702.361.3033
Email: info@pacificstocktransfer.com

The Transfer Agent is listed with the Commission and also has Depository Trust Corporation approval. As of December 31, 2022 there were 22,184,774 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 June 16, 2023.

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 under the corporate name SoftTek Inc. in the State of Delaware in 1995, reincorporated under the corporate name SoftTek Technologies Inc. in the State of California in 1997 and reincorporated in the State of Delaware in 2007. The Company was initially formed to provide product marketing services and fax server products.

In 1999, the Company modified its corporate name to VillageFax.com, Inc. and to VillageEDOCs, Inc. in 2000. In 2000, the Company became a fully reporting company under Sections 13 or 15(d) of the Securities and Exchange Act of 1934 until August 11, 2010 when it filed a Form 15 with the Commission.

In general, the Company's business operations involve recreational, residential, and commercial real estate acquisition, management, and development in our defined regional markets. The Company is managed by a senior group of experienced real estate and business executives and aided by advisors with substantial financial expertise. All have served in senior capacities with major national recreational and/or residential and commercial development entities. Management also is heavily experienced in home building, manufacturing of tiny homes, and consolidation of major resort properties.

The Company initially intends to operate in Texas, Northwest Arkansas and other areas of Arkansas, Oklahoma, Louisiana, and Missouri, all experiencing significant population growth and business expansion, and attracting people seeking a remote, balanced lifestyle in an upscale recreational or residential setting. The next targeted marketing area will be Florida and adjacent states. For the most current information regarding the Company's business operations and management team, please visit its corporate website at www.holidayislandholdings.com.

Prior to 2014, the Company maintained assets and its business operations and financial statements appear to be inconsistent with the definition of a "shell company" as defined in Rule 405 of the Securities Act and Exchange Act. While the Company's current financial statements reflect nominal assets and no revenue generation, the Company's management team is currently pursuing an identified business plan involving real estate acquisition and development as evidenced by the Company's operating expenses. Based on its Annual Report year ended December 31, 2022, the Company does not appear to be a "shell company" as it is pursuing an identified business plan, maintains assets valued at \$63,887.00 and reported operating expenses of \$335,013.00.

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,

A handwritten signature in black ink, appearing to be 'MP' or similar initials, written in a cursive style.

Morgan E. Petitti, Esq.