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August 2, 2022

VIA ELECTRONIC MAIL

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

Re: Attorney Letter with Respect to Adequate Current
Information of Cuba Beverage Company (“CUBV”)

To whom it may concern:

We have been retained by Cuba Beverage Company, a Wyoming corporation (the “Company” or the “Issuer”), for the purpose of rendering our opinion as to the adequacy of the current information and disclosure document posted by the Company on the OTC Disclosure and News Service and for other related matters. OTC Markets Group Inc. is entitled to rely on this opinion 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, as amended (the “Securities Act”).

The undersigned and sole author of this opinion is a U.S. resident. The undersigned is not an employee of the Company. The undersigned is not general counsel for the Company. The undersigned is not “regular disclosure counsel” for the Company. However, we, including the undersigned, may provide additional representation to the Company in the future for other matters, some of which may constitute “disclosure counsel” matters as such term is used by OTC Markets Group, Inc. Neither we nor the undersigned beneficially own any shares of the Company’s securities. Neither we nor the undersigned has received any shares of the Company’s securities in payment for services, nor are we or the undersigned a party to any agreement to do so.

The undersigned is authorized to practice law in the State of California. The undersigned is permitted to practice before the Securities and Exchange Commission (the “SEC”) and has not been prohibited from practice thereunder. The undersigned is not currently the subject of an investigation, hearing, or proceeding by the SEC, the U.S. Commodity Futures Trading Commission (the “CFTC”), the Financial Industry Regulatory Authority (“FINRA”), or any other federal, state, or foreign regulatory agency, nor has the undersigned been subject to any such investigation, hearing, or proceeding in the past five (5) years. The undersigned is not currently suspended or

barred from practicing in any state or jurisdiction, nor has the undersigned been so suspended or barred within the past five (5) years. The undersigned has not been charged (which we understand to be named as a defendant or cross-defendant) in any civil or criminal case (other than minor traffic offenses) within the past five (5) years.

In connection with this rendering of this opinion, the undersigned has examined such corporate records and other documents and such questions of law as counsel considered necessary or appropriate for purposes of rendering this letter.

The undersigned expresses no opinion with respect to laws of any jurisdiction other than the federal laws of the United States of America. This opinion is limited to the effect of the present state of the laws the United States of America.

As to matters of fact, the undersigned relies on information obtained from public officials, officers of the Issuer and other sources, where such sources are believed to be reliable. In rendering this opinion, the undersigned has examined such corporate records and other documents, including, but not limited to, the following documents: (a) the currently effective articles of incorporation and bylaws of the Issuer, (b) corporate minutes and written consents of the Issuer's board of directors and shareholders, and (c) such other corporate records and other as were necessary and provided by the Issuer management for purposes of this letter.

In all such examinations and in giving this opinion, the undersigned has assumed the genuineness of all signatures (including those delivered by facsimile or electronic mail in "PDF" format), the legal capacity and competency at all relevant times of all natural persons signing any documents, the authenticity of all documents submitted to the undersigned as originals, the conformity to authentic original documents of all documents submitted to the undersigned as certified, authenticated, conformed, notarized, photostatic or facsimile copies and the authenticity of the originals of such certified, authenticated, conformed, notarized, photostatic or facsimile copies. The undersigned has also assumed that (a) all facts set forth in the official public records, certificates, and documents supplied by public officials or otherwise conveyed to the undersigned by public officials are complete, true, and accurate and (b) all facts set forth in the certificates supplied by the representatives of the Issuer are complete, true, and accurate. The undersigned expresses no opinion as to the validity of any of the assumptions, for or content of any financial or statistical data contained in the Information (as defined below).

Where the undersigned renders an opinion herein with respect to the existence or absence of facts or circumstances and such opinion is qualified by the expression "to our knowledge" or words to like effect, it is based solely on: (i) the actual knowledge of the undersigned learned during the course of representing the Issuer; (ii) a review of any executed certificate of representatives of the Issuer referred to above covering

such matters; and (iii) such other investigation, if any, as we specifically set forth herein. We (including the undersigned) have not undertaken any other investigation.

On May 4, 2021, the Issuer posted on OTC Disclosure and News Service its Financial Statements for the Year Ended December 31, 2021, which include its unaudited consolidated balance sheets, related statements of income, and consolidated statements of cash flow as of and for the year then ended (the “2020 Annual Financial Statements”). On July 29, 2022, the Issuer posted on OTC Disclosure and News Service its Annual Disclosure Statement Pursuant to the Pink Basic Disclosure Guidelines (the “2021 Annual Disclosure Statement”) pursuant to Rule 15c2-11(a)(5), as well as the Issuer’s Financial Statements for the Year Ended December 31, 2021, which include its unaudited consolidated balance sheets, related statements of income, and consolidated statements of cash flow as of and for the year then ended (the “2021 Annual Financial Statements” and, collectively with the 2020 Annual Financial Statements, the “Financial Statements”). The 2021 Annual Disclosure Statement and the Financial Statements are collectively referred to as “Information.” The undersigned has reviewed such documents in connection with the undersigned’s preparation of this letter.

Based on the examination set forth above, the undersigned is of the opinion that the Information (i) constitutes “adequate current public information” concerning the Issuer’s common stock, par value \$0.00001 per share (the “Securities”) and the Issuer (other than the information set forth in Rule 15c2-11(b)(5)(i)(N) and (P)) 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 Securities Exchange Act of 1934 (the “Exchange Act”) (other than the information set forth in Rule 15c2-11(b)(5)(i)(N),(O), and (P)), (iii) complies as to form with the OTC Markets Group’s OTC Pink Disclosure Guidelines, which are located on the Internet at www.otcmarkets.com, and (iv) has been posted through the OTC Disclosure and News Service.

The Issuer’s Financial Statements were prepared by Jack Runke. Mr. Runke is a licensed Certified Public Accountant in California for the past 38 years. Mr. Runke has experience in closely held businesses, preparing tax returns, financial statements, tax research and consulting. The Issuer has represented to the undersigned that the Financial Statements were prepared in accordance with Generally Accepted Accounting Principles.

The Issuer’s transfer agent is Colonial Stock Transfer with an address of 66 Exchange Place, Ste 100, Salt Lake City, UT 84111, and is registered with the SEC. The method used to confirm the number of outstanding shares of the Issuer’s stock as set

forth in the Information was through receipt of written confirmation from the transfer agent as to the number of outstanding shares as of the dates set forth therein.

The undersigned has (i) personally met (via Zoom) with Adam Engel, Ethan Zachadynk, and Graham Cox, who constitutes management and a majority of the directors of the Issuer, (ii) reviewed the Information published by the Issuer on the OTC Disclosure and News Service, and (iii) discussed the Information with management and a majority of directors of the Issuer.

To the best of the undersigned's knowledge, after inquiry of management and the directors of the Issuer, neither the Issuer, any 5% holder, nor the undersigned is currently under investigation by any federal or state regulatory authority for any violation of federal or state securities laws, except as set forth in the Information.

Based solely on the undersigned's examination of the corporate records and other documents and such questions of law as counsel considered necessary or appropriate for purposes of rendering this letter, the Issuer's filings with the SEC, the Information, and the undersigned's review and discussion of the Information with management and a majority of directors of the Issuer, and the Issuer's representations made therein, the Issuer is a "shell company" as defined in Rules 405 of the Securities Act and 12b-2 of the Exchange Act.

OTC Markets Group Inc. is entitled and authorized to rely on this letter in determining whether the Issuer has made adequate information publicly available within the meaning of 144(c)(2) under the Securities Act. No person or entity other than OTC Markets Group Inc. is entitled to rely on this letter, but permission is granted to OTC Markets Group Inc. to publish this letter in the OTC Disclosure and News Service for viewing by the public and regulators. This opinion speaks only as of the date above written. We assume no duty to update, revise, or supplement this opinion or to communicate with you with respect to any change in law that comes to our attention hereafter.

Very truly yours,



MARC A. INDEGLIA
of GLASER WEIL FINK HOWARD AVCHEN & SHAPIRO LLP

MAI:ds

cc: Cuba Beverage Company (via email)