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September 25, 2021

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

Re: Shonghoya Intl. Group Inc., trading symbol “SNHO” – Quarterly Report and Disclosure Statement dated June 30, 2021

Ladies and Gentlemen:

This letter is written on behalf of my client Shonghoya Intl. Group Inc., a Nevada corporation (the “Company”). OTC Markets Group Inc. is entitled to rely on this letter in determining if the Company has made adequate public disclosure of current information within the meaning of Rule 144(c)(2) under the Securities Act of 1933, as amended (the “Securities Act”). I am an attorney admitted to the bar of the State of Washington and resident in the State of Washington, and I am not currently, nor have I been in the past five years, suspended or barred from practicing in any state or jurisdiction, and nor have I ever been charged in a civil or criminal case, and nor have I ever been the subject of an investigation, hearing, or proceeding by the SEC, the U.S. Commodity Futures Trading Commission, the Financial Industry Regulatory Authority, or any other federal, state, or foreign regulatory agency. I am permitted to practice before the Securities and Exchange Commission and have not been prohibited from practice thereunder. I serve as outside counsel retained by the Company. I do not beneficially own any shares of capital stock of the Company. I have not received, nor have I agreed to receive in the future, shares of the Company’s capital stock, in payment for services.

I have examined such current corporate records and other documents and questions of law as I consider necessary for the issuance of this letter. I have relied on information obtained from public officials, officers of the Company and other sources. I represent that all such sources are believed to be reliable.

I have relied on the Quarterly Report and Company Information and Disclosure Statement dated June 30, 2021, which was posted on the OTC Disclosure and News Service on September 25, 2021 (together, the “Information”). The Information constitutes (i) “adequate current public information” concerning the Securities and 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 under Rule 15c2-11 under the Securities Exchange Act of 1934 (the “Exchange Act”), (iii) complies as to the form with the OTC Market Group’s Pink Basic Disclosure Guidelines, which are located on the Internet at www.orcmarkets.com, and (iv) has been posted through the OTC Disclosure & News Service. However, my opinion does not alleviate the professional responsibilities of brokers, dealers and investors to conduct their own due diligence.

In examining the foregoing documents, I have assumed the authenticity of signatures (both manual and conformed), the authenticity of documents submitted as originals, the conformity with originals of all documents furnished as copies, and the correctness of facts set forth in such documents. I have also assumed all oral representations in connection with this matter to be accurate. Nothing came to

my attention during the course of my investigation that led me to conclude that any of such documents were not genuine or authentic or that the facts set forth therein were not true.

The financial statements included in the Information were prepared by PubCo Reporting Solutions, Inc., in collaboration with the Company's CEO, Ms. Wen-Chun Chen. The financial statements contained in the Information are not audited. Ms. Chen is an established business person in Taiwan. Due to travel restrictions imposed by governments following the outbreak of the COVID-19 novel coronavirus, I met telephonically with Ms. Chen. I reviewed the Information, as amended, published by the Company through the OTC Disclosure & News Service and discussed the Information with management and a majority of the directors of the Company.

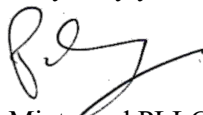
The Company's transfer agent is Nevada Agency and Transfer Company (NATCO), 50 W. Liberty Street, Suite 880, Reno, NV 89501. The transfer agent is registered with the Securities and Exchange Commission. The method used by me to confirm the number of outstanding shares was a review of the Company's filings and the records of NATCO.

After consultation with the Company's management and a majority of the Board of Directors, I am satisfied that neither the Company, any individual officer or 5% stockholder, nor myself as outside counsel, is currently under investigation in any jurisdiction.

The foregoing opinions are subject to the following assumptions, exceptions, limitations and qualifications. The opinions expressed in this letter are rendered as of the date hereof and are based on my understandings and assumptions as to present facts, and on the application of applicable law as the same exists on the date hereof, and should not be relied upon by any person other than the OTC Markets Group. I assume no obligation to update or supplement this opinion letter after the date hereof with respect to any facts or circumstances that may hereafter come to my attention, or to reflect any changes in the facts or law that may hereafter occur or take effect. I give OTC Markets Group Inc. permission to publish this letter in the OTC Disclosure and News Service for viewing by the public and regulators.

The Company was, prior to June 30, 2021, a "shell company" as defined in Rules 405 of the Securities Act of 1933 and 12b-2 of the Exchange Act of 1934. However, following its acquisition of an operating company on June 3, 2021, the Company ceased to be a shell company.

Very truly yours,

A handwritten signature in black ink, appearing to read 'P. Loney', with a stylized flourish at the end.

Mintwood PLLC
Patrick Loney, Managing Member