

LAW OFFICE OF CARL SMART

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January 15, 2018

E-mail: issuers@otcmarkets.com

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

Re: Innovative Beverage Group Holdings, Inc.
Sufficiency of Adequate Current Information

I am a U.S. resident and I have been retained as legal counsel by Innovative Beverage Group Holdings, Inc. ("Innovative Beverage Group Holdings, Inc." or the "Issuer"), a North Carolina corporation, for the purpose of reviewing the current information supplied by the Issuer and rendering this letter to you with respect to the information publicly disclosed by the Issuer to you and published in the OTC Disclosure and News Service. OTC Markets Group, Inc. is entitled to rely on this letter in determining whether the Issuer has made adequate current information publicly available regarding the Issuer and the common stock of the Issuer (the "Securities") within the meaning of Rule 144(c)(2) promulgated under the Securities Act of 1933, as amended (the "Securities Act"). I hereby consent to having this letter posted by the Issuer, and to have it be published, accompanying its disclosure in the OTC Markets News Service. I hereby represent that I am licensed to practice law in the United States in the State of Texas I am permitted to practice before the U.S. Securities and Exchange Commission (the "Commission") and I have not been prohibited from practice before the Commission.

In preparing this letter, I have examined such corporate records and other documents and such questions of law as we considered necessary or appropriate for the purpose of rendering this letter; including the Articles of Incorporation, as amended, and Bylaws of the Issuer as well as its annual, quarterly (and other reports previously filed with the Commission as filed through (the "SEC Filings") and the Issuer's unaudited financial statements as of December 31, 2017 that have been filed with OTC Markets Group, Inc., and such other corporate documents and such questions of law as we considered necessary or appropriate for purposes of rendering this letter. As to matters of fact in this letter, I have also relied upon information from public officials, officers of the Issuer and other sources, which sources I believed to be reliable. In such examination, I have assumed the genuineness of all signatures set forth on each document, the authenticity of all original documents and the conformity to original documents-of all copies of such documents as may have been supplied to me during the course of my examination. In issuing this letter, I represent as follows:

1. That the Issuer's previous SEC filings and publicly available information with regard to the Issuer as filed with the OTC Markets Group, Inc.: (i) constitutes "adequate current public information" concerning the Securities and the Issuer and "is available" within the meaning of Rule 14(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 I 5c2-11 under the Securities Exchange Act of 1934 (the "Exchange Act"), (iii) complies as to form with the OTC Markets Guidelines for Providing Adequate Current Information, which are located on the Internet at www.OTCMarkets.com.
2. That the financial statements of the Issuer for the period ended December 31, 2017 are not audited and were prepared by Marvin Winick. Marvin Winick, 14 Pico Crescent, Thornhill, Ontario, L4J 8P4 Canada, is an independent accountant but is not a certified public accountant in Canada or the US, who utilized normative GAAP methodology.

3. That the issuer's transfer agent is Empire Stock Transfer Inc.; which is registered with the Commission. I telephoned the transfer agent to confirm the number of issued and outstanding shares of common stock at 70,196,490 shares of common stock on December 31, 2017.
4. That I have: (i) personally met with Ms. Collette, the Court Appointed Receiver of the management of the Issuer by teleconference on January 15, 2018, (ii) reviewed the Issuer's previous SEC Filings and other information filed by the Issuer on the OTC Markets Inc. News Service, and (iii) discussed the Issuer's filings with Ms. Collette and Mr. Winick.
5. That to the best of my knowledge, after inquiry of management and of the Board of Directors of the Issuer, that neither the undersigned nor the Issuer, nor any of its officers and/or directors, or any 5% shareholder is currently under investigation by any federal or state regulatory authority for any violation of federal or state securities laws.

The opinions set forth herein are expressed as of the date hereof and remain valid so long as the documents, instruments, records and certificates I have examined and relied upon as noted above, are unchanged and the assumptions I have made, as noted above, are valid. While this letter is intended exclusively for use by OTC Markets Group, Inc., the same is hereby granted full and complete rights and permission without any future request to publish this letter as part of "OTC Markets.com" for viewing by the public and regulatory agencies.

Sincerely,

A handwritten signature in black ink, appearing to read 'Carl Smart', with a long horizontal stroke extending to the right.

Carl Smart