

HORWITZ + ARMSTRONG

A PROFESSIONAL LAW CORPORATION

14 Orchard, Suite 200
Lake Forest, California 92630
T: (949) 540-6540
F: (949) 540-6578

North San Diego Office:
804 N. The Strand #9
Oceanside, CA 92054

April 29, 2019

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

RE: Attorney Letter with Respect to Adequate Current Information of NUGL, Inc. (the "Issuer") for the year ended December 31, 2018.

Dear Sir or Madam:

This firm has acted as general legal counsel (the "Counsel") for the Issuer and has been asked to prepare this Letter of Counsel (the "Letter"), in accordance with the applicable laws of Oklahoma and of the United States, regarding its corporate operations and level of disclosure of corporate information.

Counsel has examined such corporate records and other documents and such questions of law as Counsel considered necessary or appropriate for the purposes of rendering this Letter. Counsel has reviewed specific documents concerning the Issuer (the "Information") in connection with the preparation of this Letter. The Information is listed below with the date it was posted through the OTC Disclosure and News Service (the "OTC News Service"), if applicable:

- Issuer's Annual report for the year ended December 31, 2018, posted on April 8, 2019.
- Issuer's Amended Quarterly report for the period ended September 30, 2018, posted on November 19, 2018
- Issuer's Quarterly report for the period ended June 30, 2018, posted on August 14, 2018.
- Issuer's Quarterly report for the period ended March 31, 2018, posted on May 15, 2018.
- Issuer's Amended Annual report for the year ended December 31, 2017, posted on April 4, 2018.
- Issuer's Quarterly report for the period ended September 30, 2017, posted on November 27, 2017.
- Issuer's Amended Annual Reports for the year ending December 31, 2015 and 2016, posted on September 21, 2017.
- Issuer's Amended Quarterly Reports for the periods ending March 31, 2016, June 30, 2016 and September 30, 2016, March 31, 2017 and June 30, 2017 filed on September 21, 2017.
- Corporate minutes of the meetings of its Board of Directors and shareholders.
- Other related corporate information as were necessary and provided by the corporation's management and transfer agent.

Additionally, Counsel has (i) personally met with management and a majority of the directors of the Issuer, specifically in person with Brandon Vargas, Tom Bouse, John Armstrong, and Bob Kurilko, (ii) reviewed the Information, as amended, published by the Issuer through the OTC News Service and (iii) discussed the Information with management and a majority of the directors of the Issuer.

The opinions and conclusions contained in this Letter are based upon the information and facts made available to Counsel, and are solely based on the accuracy of such Information and facts. Further, Counsel has reviewed all prior disclosures, as amended, (the "Prior Disclosures") posted by the Issuer with the OTC News Service. All such Prior Disclosures are believed to be accurate and reliable. In the event that the Information, facts, and

Prior Disclosures are determined not to be true, this Letter is rescinded and to be deemed null and void. Counsel has discussed the above Information, Prior Disclosures, and the underlying assumptions Counsel is relying upon, with the management of the Issuer.

The financial statements were prepared internally by management:

The financial statements of the Issuer are not audited. The financial statements are prepared in accordance with US GAAP by Tom Bouse, the Issuer's CFO. Mr. Bouse has over 20 year's experience and is the founder and owner of Pacific Rim Tax and Accounting, headquartered in Huntington Beach, California. His expertise in tax services, accounting, consulting and financial planning, along with two decades of dedicated service to owners and entrepreneurs of all sizes of business, is unparalleled. He began his career at a full-service CPA firm specializing in taxation, IRS audits, tax settlement, business filings and tax returns. Prior to owning his own practice he worked at PriceWaterhouseCoopers. Mr. Bouse is a certified public accountant with 20+ years experience in accounting. Mr. Bouse and Issuer's management have reviewed the Issuer's unaudited financial statements and reports as published with OTC Markets.

The transfer agent for the Issuer is:

Action Stock Transfer
2649 E. Fort Union Blvd., Suite 214 Salt Lake City, UT 84121
Phone: 801-274-1088

The transfer agent is registered with the Securities and Exchange Commission (the "SEC"). A Shareholder list dated as of December 31, 2018 and March 29, 2019 (and subsequent email confirmation prior to filing) was used by Counsel and the Issuer to confirm the number of outstanding shares set forth in the Annual Report for the year ended December 31, 2018.

OTC Markets Group, Inc. ("OTC Markets Group") is entitled to rely on this Letter in determining whether the Issuer has made adequate current information publicly available within the meaning of Rule 144(c)(2) of the Securities Act of 1933 (the "Securities Act"). No person or entity other than the OTC Markets Group is entitled to rely upon this Letter. OTC Markets Group is granted full and complete permission and rights to publish this Letter via the OTC Disclosure and News Service for viewing by the public and regulators. Counsel is of the opinion that the Information (i) constitutes "adequate current public information" concerning the Issuer's securities (the "Securities") and the Issuer, and "is available" within the meaning of Rule 144(c)(2) of the Securities Act, (ii) includes all the information that a broker-dealer would be required to obtain from the Issuer in order to publish a quotation for the Securities pursuant to Rule 15c2-11 of the Securities Exchange Act of 1934, (iii) complies as to form with the OTC Markets Group's Disclosure Guidelines for Providing Adequate Current Information, available at www.otcmarkets.com, and (iv) has been posted through the OTC Disclosure and News Service.

To the best of Counsel's knowledge, after inquiry of management and the majority of the directors of the Issuer, neither Counsel, nor the Issuer, nor any 5% or more holders of the Securities is currently under investigation by any federal or state regulatory authority for any violation of federal or state securities laws.

The issuer, nor its predecessors, is or ever was a "shell company" as defined in Rules 405 of the Securities Act of 1933 and 12b-2 of the Exchange Act of 1934. Pursuant to Issuer's domiciliary merger to Oklahoma followed by the reorganization under §1081(g) of the Oklahoma General Corporation Act, Nugl, Inc. of Oklahoma was a brand new company/parent, not a successor in interest in and to the former entities set forth in Section 1; former names are provided of predecessor entities solely for shareholders who may have lost contact, to be able to identify Nugl as a corporation they may have an interest in. In the reorganization, Nugl Inc. merely inherited the shareholder structure of those predecessor entities. The reorganization did not allow for reporting responsibility to transfer, nor any operating history, including former tax ID, sec file number, or otherwise. As such, the Company is not and has never been a shell company since its inception on August 24, 2017.

The undersigned is licensed in the State of California and resides in that state. Counsel is a United States resident and has been retained by the Issuer for the purpose of rendering this Letter and related matters. Counsel is an outside law firm acting as special securities and regular disclosure counsel. Counsel does not own any of Issuer's shares and no current agreement exists related to accepting stock as payment for services in the future.

The undersigned is not currently and has never been suspended or barred from practicing in any state or jurisdiction, nor charged in a civil or criminal case.

Counsel has relied on information obtained from public officials, officers of the Issuer, and other sources. Counsel has no reason to believe that the records, certificates, or other documents of the Issuer (that we have reviewed) are not accurate, authentic, or reliable. The opinion expressed above is subject to the following assumptions, exceptions and qualifications:

(a) We have assumed that (i) all information in all documents reviewed by us is true and correct, (ii) all signatures on all documents reviewed by us are genuine, (iii) all documents submitted to us as originals are true and complete, (iv) all documents submitted to us as copies are true and complete copies of the originals thereof, and (v) each natural person signing any document reviewed by us had the legal capacity to do so.

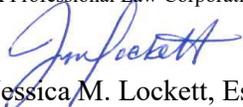
(b) We have made no independent investigation as to the accuracy or completeness of any factual matters contained in the records, documents and certificates that we have reviewed in connection with the foregoing opinion.

(c) We are admitted to practice law in the State of California. The opinion expressed above is limited to the federal laws of the United States of America and the laws of the state of Oklahoma. No other opinion is expressed regarding the law of other jurisdictions, choice of law, or conflict of law and this Letter does not rely on the work of other counsel.

(d) Counsel is permitted to practice before the SEC and has not been prohibited from practice thereunder.

We express no opinion as to any matter other than as expressly set forth above, and no opinion on any other matter may be inferred or implied from this Letter. The opinions expressed herein are given as of the date of this Letter, and we disclaim any obligation to advise you of any change in any matter set forth herein.

Regards,
HORWITZ + ARMSTRONG
A Professional Law Corporation


Jessica M. Lockett, Esq.