

# John T. Root, Jr.

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John T. Root, Jr.

May 30, 2019

OTC Markets Group, Inc.  
304 Hudson Street  
2<sup>nd</sup> Floor  
New York, New York 10013

Re: Innovest Global, Inc. (IVST)  
Attorney Letter with respect to the Adequacy of Current Information for  
the Year Ended December 31, 2018, with Amended Disclosures

Ladies and Gentlemen:

My office has been engaged by Innovest Global, Inc. (the "Company") to be its special securities counsel. OTC Markets Group, Inc. is entitled to rely on this letter to determine whether the Company has made current information publicly available within the meaning of Rule 144(c)(2) of the Securities Act of 1933, and all rights and permissions to fully publish it. No other person, or entity, may rely hereon. I have examined such corporate records and other documents and have asked such questions of law as I have considered necessary or appropriate under the circumstances for the purpose of issuing this letter. I have relied on publicly available information from the Secretary of State of the State of Nevada and information obtained from the Company's officers and directors, as provided below. I have also reviewed documents published at [www.OTCMarkets.com](http://www.OTCMarkets.com), as provided below. I specifically note the following:

**Warning! This company has posted limited financial disclosure through the OTC Disclosure & News Service or is late in their filing obligations with the SEC.**

This statement should be removed, in a timely manner, upon filing of this letter and full disclosure of information further required by OTC Markets.

I am an attorney, licensed and authorized to practice law in the state of Arkansas and am permitted to practice before the United States Securities and Exchange Commission (the "SEC") and have not been prohibited from practicing thereunder, nor have I been suspended or barred from practicing in any state or jurisdiction within the last five years, or charged in a civil or criminal matter. I have never been an officer, nor on the Board of Directors of the Company, and I do not own any stock currently, nor do I have any agreement to acquire such in the future, directly or beneficially. This letter applies to laws of the State of Arkansas and the United States of America and to all jurisdictions therein. I have not relied on the work of other counsel.

I have relied on information obtained from public officials, officers of the Company and other sources, believing all such sources to be reliable, and upon which I did rely. I have assumed the genuineness of all signatures on all documents, the legal capacity of all natural persons, the

authenticity of all documents submitted to me as originals, the conformity to original documents of all documents submitted to me as photostatic copies, and authenticity of the originals of such documents. In rendering this opinion letter, I have reviewed the following reports:

- Current filings with the Nevada Secretary of State as of May 30, 2019. Note that, according to Nevada Secretary of State website information, Innovest Global, Inc. was incorporated on October 14, 1999;
- The Company's Unaudited Financial Report and separate Disclosures encompassing each of the annual periods ended December 31, 2018, as amended and published on May 23, 2019 and December 31, 2017, as published by OTC Markets on February 13, 2018;
- The Quarterly Statements (replacing flawed upload file) and separate Disclosures for the quarterly periods ended March 31, 2019, as published by OTC Markets on May 29, 2019 and May 24, 2019, respectively; March 31, 2018, June 30, 2018, and September 30, 2018, as published by OTC Markets on November 14, 2018, November 14, 2018, and November 14, 2018, respectively, and the Quarterly Statements and separate Disclosures for the quarterly periods ended March 31, 2017, June 30, 2017, and September 30, 2017, as published by OTC Markets on July 3, 2017, July 3, 2017, and December 15, 2017, respectively;
- Notification of Late Filings for the period ended December 31, 2018, as published by OTC Markets on March 22, 2019 and for the Quarter ended March 31, 2019, as published by OTC Markets on April 29, 2019;
- The Company's Articles of Incorporation as Amended on various dates, but the original document as filed on October 14, 1999 and By Laws, both published on [www.OTCMarkets.com](http://www.OTCMarkets.com) as of November 4, 2012,;
- And such other information that I considered necessary under the specific circumstances

After considering the totality of information presented to me, it is my opinion that said documents are accurate, up-to-date and contain the most current information available on Innovest Global, Inc., all as published, or re-published, on the OTC Markets Group website, or other sites, and it is my opinion that the information referred to above (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 of 1933, (ii) includes all of the information that a broker-dealer would require 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"), (iii) complies as to form with the OTC Market Group's Pink Basic Disclosure Guidelines for Providing Adequate Current Information, which are located on the Internet at [www.otcmarkets.com](http://www.otcmarkets.com), and (iv) has been posted through the OTC Disclosure and News Service.

The person responsible for the preparation and compilation of the financial statements, and other disclosure information, contained in the Information is L. Michael Yukich, CFO, who obtained his BA degree in Business Administration from the University of Mount Union and his MBA from Central Michigan University. Mr. Yukich has over 30 years of financial management experience in both publicly and privately held manufacturing companies, including positions with

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several Fortune 500 companies. The unaudited Financial Statements were prepared in accordance with GAAP, and were compiled under the supervision of Mr. Yukich by Plante & Moran, PLLC, an independent auditing group. The Financial Statements published as of the date of this opinion letter, and upon which I relied are unaudited. I have been informed that the Financial Statements and records of the Company are currently being audited, and the Company anticipates publishing the audited Financial Statements, when available.

The Issuer's transfer agent is Pacific Stock Transfer Company and is registered with the SEC, as confirmed with the SEC website. The contact information for the transfer agent is:

Pacific Stock Transfer Company  
64045 South Spencer Street, Suite 403  
Las Vegas, NV 89119  
Tel: 702-361-3033  
Fax: 702-433-1979

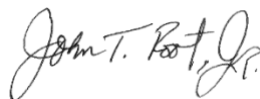
I have (i) met face to face via videoconference with Dan Martin, Mike Yukich, and Damon Mintz, a majority of management, and Dan Martin, Jason Painley, and John Klopp, a majority of the directors, (ii) I have reviewed the Information, as amended, published by the Issuer through OTC Disclosure and News Service and (iii) discussed pertinent information with its management and directors.

After inquiry of management and the directors, to the best of my knowledge, neither the Issuer of the Securities, any 5% shareholder, nor counsel is currently under investigation by any federal or state regulatory authority for any violation of federal or state securities laws.

Based on my review of filings, and information supplied to me by management of the Company, neither it, nor any of 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.

I appreciate your assistance, on behalf of the Company. Please feel free to contact me should you have any comments or questions in regard to the information or any of the matters addressed herein.

Sincerely,

A handwritten signature in black ink that reads "John T. Root, Jr." in a cursive style.

John T. Root, Jr.