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REVISED

September 1, 2020

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

Re: Omid Holdings, Inc., trading symbol "OMID" - Annual Report and Disclosure Statement for Year-Ended December 31, 2019

Ladies and Gentlemen:

This letter is written on behalf of our client Omid Holdings, Inc., a Florida 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"). We are attorneys admitted to the bar of the State of California and resident in the State of California and this letter covers the jurisdiction of the state of California as well as the applicable laws of the United States of America. We are permitted to practice before the Securities and Exchange Commission and have not been prohibited from practice thereunder. We act as outside securities counsel to the Company. One part of our duties is to ensure that regular disclosure is made to the public pursuant to the Securities Act and related rules and regulations.

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

The documents containing the information concerning the Issuer, its financial statements and the Securities that are publicly available as of the date of this letter and that I have reviewed in connection with the preparation of this Opinion include the following:

- Annual Report-Amended for the years ended December 31, 2019 and 2018 as filed with OTC Markets, Inc. on August 28, 2020.
- Quarterly Report-Amended for the quarter ended June 30, 2020 as filed with OTC Markets, Inc. on August 27, 2020.
- Quarterly Report-Amended for the quarter ended March 31, 2020 as filed with the OTC Markets on August 28, 2020.
- Quarterly Report for the quarter ended March 31, 2019 as filed with OTC Markets, Inc. on June 3, 2019.

- Quarterly Report for the quarter ended June 30, 2019 as filed with OTC Markets, Inc. on November 15, 2019.
- Quarterly Report for the quarter ended September 30, 2019 as filed as filed with OTC Markets, Inc. on November 21, 2019.

All of the financial information in the aforementioned reports was prepared by Lisa Landau, the Company's outside bookkeeper. Ms. Landau is an experienced bookkeeper having prepared financial statements for several OTC Markets filers and for SEC filers for over 10 years. The December 31, 2019 and 2018 annual financial statements were not audited.

We have relied on the information contained in the Annual Report-Amended and Quarterly Reports, Issuer Information and Disclosure Statements for the periods ended as set forth above and posted on the dates as set forth above with the OTCMarkets.com in rendering our opinion. This information constitutes (i) "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, (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"), (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 and (iv) has been posted through the OTC Disclosure and News Service between June 3, 2019 and August 28, 2020. However, our opinion does not alleviate the professional responsibilities of brokers, dealers and investors to conduct their own due diligence.

The Company is not a "shell company" as defined in Rule 405 of the Securities Act of 1933 and 12b-2 of the Exchange Act.

In examining the foregoing documents, we 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. We have also assumed all oral representations in connection with this matter to be accurate. Nothing came to our attention during the course of our investigation that led us to conclude that any of such documents were not genuine or authentic or that the facts set forth therein were not true.

The Issuer's transfer agent is Pacific Stock Transfer Company, 6725 Via Austi Pkwy, Ste. 300, Las Vegas, NV 89119. The transfer agent is registered with the Securities and Exchange Commission. The method used by us to confirm the number of outstanding shares was a review of the issuer's filings including shareholder list provide to us by the transfer agent.

We have reviewed the information, as amended, published by the Company through the OTC Disclosure and News Service and personally talked with Mr. Adam Frank and Mr. Kevin Anderson, currently the only two members of the Board of Directors and the CEO and COO of the Company, respectively, to discuss the information and quality assurance with respect to such information.

After such personal consultation with Messrs. Frank and Anderson, we are satisfied that neither the Company, any individual officer or 5% shareholder, nor this law firm, or any member of this law firm is currently or has in the past five years, been the subject of an investigation, hearing, or proceeding by the SEC, the Commodity Future Trading Commission (CFTC), the Financial Industry Regulatory Authority (FINRA), or any other federal, state, or foreign regulatory agency.

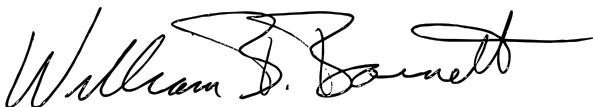
The undersigned, counsel to the Company, is not currently, nor has he, in the past five years, been suspended or barred from practicing in any state or jurisdiction or has been charged in a civil or criminal case.

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 our understandings and assumptions as to present facts, and on the application of applicable law as the same exists on the date hereof. We 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 our attention, or to reflect any changes in the facts or law that may hereafter occur or take effect. We give OTC Markets Group Inc. permission to publish this letter in the OTC Disclosure and news Service for viewing by the public and regulators.

Very truly yours,

BARNETT & LINN

By 

William B. Barnett

California Bar No. 47422