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March 15, 2019

Via Electronic Mail Only

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OTC Markets Group, Inc.
304 Hudson St., 3rd Floor
New York, NY 10013

RE: **China Travel Resort Holdings, Inc**.
Legal opinion as to public disclosure requirements.

Two whom it may concern:

The following constitutes an opinion letter regarding China Travel Resort Holdings, Inc., a Nevada corporation, ("CTVZ" and/or the "Issuer"), public disclosures within meaning and scope of Rule 144(c)(2) of the Securities Act of 1933 and OTC Markets Group, Inc.'s Pink Guidelines. No person other than OTC Markets Group, Inc. ("OTC") may rely upon this opinion in their determination of CTVZ's compliance obligations of public disclosure under the Act, however, OTC may publish this opinion through the OTC Disclosure & News Service for viewing by the public and regulators.

Information regarding attorney issuing the opinion:

Undersigned counsel is a U.S. resident and has been retained by CTVZ for purposes of reviewing the information provided by the issuer and is rendering a legal opinion as to its compliance with Rule 144(c)(2). Counsel is licensed to practice law and is in good standing in all state and federal jurisdictions within the State of Louisiana, including, the U.S. Federal Court of Appeals for the 5th Circuit. Our address and contact information may be found on our company's letterhead herein. Further, undersigned counsel is permitted to practice before the Securities and Exchange Commission, ("SEC"), and has not been prohibited from practicing thereunder, nor is under any investigation by any state or federal regulatory authority.

Method, documentation and information relied upon:

Undersigned counsel has relied upon public and private information as made available by the Secretary of State of Nevada and the issuer, CTVZ; including, all corporate articles and all amendments thereto; annual disclosure statements for fiscal year 2018, 2017 and 2016; and,

quarterly financial reports for 2018 for the period ending on September 30, 2018. Additionally, we have conferred and discussed with the management and directors of the Issuer regarding the number of outstanding shares, and, further confirmed the same in reviewing all of the information provided and published by the Issuer through the OTC Disclosure & News Service. All the information provided was deemed to be reliable.

The following documents were posted and containing information concerning the Issuer and Securities available through the OTC Disclosure & News Service in preparation of this opinion letter:

1. Annual Report- Annual Report for year ending December 31, 2018; published on March 15, 2019.
2. Quarterly Report - Quarterly Report for period ending September 30, 2018; published on January 6, 2019.
3. Quarterly Report - Quarterly Report for period ending June 30, 2018; published on December 31, 2018.
4. Quarterly Report - Quarterly Report for period ending March 31, 2018; published on December 31, 2018
5. Annual Report - Annual Report year ending December, 31 2017; published on December 31, 2018.
6. Annual Report - Annual Report year ending December 31, 2016; published on December 31, 2018.

Compliance with Public Disclosure Rules:

The information provided contains adequate current public information concerning the Issuer and the Securities, and is available within the meaning and scope of Rule 144(c)(2) of the Securities Act. Additionally, the information provided includes all of the information that a broker-dealer would be required to obtain from the Issuer to publish a quotation for the corresponding Securities under Rule 15c2-11 under the Securities Exchange Act of 1934 (the "Exchange Act"). Further, the information provided complies with the form of OTC Pink Disclosure Guidelines and have been posted through the OTC Disclosure & News Service.

Issuer's Transfer Agent and Preparation of Financial Statements:

The Issuer's Transfer Agent is Pacific Stock Transfer Co., Inc., ("PST"), 6725 Via Austin Parkway, Suite 300, Las Vegas, NV 89119, and may be contacted at (469) 633-0101. PST is a registered transfer agent under the Securities Exchange Act of 1934, as amended. PST is registered and listed with the SEC under TA CIK# 000721748.

The person responsible for preparation of the financial statements published in compliance with regulatory disclosures by the Issuer was Aidan Doyle whose business address is One World Trade Center, 85th Floor, New York, NY 10007; e-mail: aidandoyle@live.com. The financial statements are unaudited.

Investigations and/or violations of state and federal securities law:

To the best of the knowledge of undersigned counsel, and after inquiries made to the management and directors of the Issuer, CTVZ is not under investigation by any federal and state regulatory authorities for any violation of state and/or federal securities laws.

Confirmation of Issuer Certification and Beneficial Shareholders information:

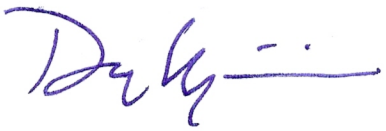
Undersigned counsel has conferred and discussed with the management and directors of the Issuer, Aidan Doyle, regarding the number of outstanding shares, and, further confirmed the same in reviewing all of the information provided and published by the Issuer through the OTC Disclosure & News Service. Upon review of the aforementioned information provided by the Issuer, and after conferring with its Management and Directors, there are three (3) Beneficial Shareholders owning more than 10% of any class of the Issuer's equity security.

The aforementioned constitutes a legal opinion as to China Travel Resort Holdings, Inc., ("CTVZ"), public disclosures within meaning and scope of Rule 144(c)(2) of the Securities Act of 1933 and OTC Market Group's Pink Guidelines. No person other than OTC may rely upon this opinion in its determination of CTVZ's compliance obligations for public disclosure. OTC may, however, publish this opinion through the OTC Disclosure & News Service for viewing by the public and regulators.

If you have any questions, please feel free to contact me at (225) 315-6223.

With kindest regards, I remain,

Very truly yours,



Douglas A. Littlejohn

DAL/ktc
Cc: Mr. Aidan Doyle