

TELEPHONE:
949-230-0259

ROBERT J. HUSTON III
ATTORNEY AT LAW
10 JETTY DRIVE
CORONA DEL MAR, CALIFORNIA 92625

E-MAIL: bob_huston@yahoo.com

March 27, 2020

OTC MARKETS GROUP
304 Hudson Street
Second Floor
New York, NY 10013

RE: *Legal Opinion* concerning Adequate Current Information of
Fovea Jewelry Holdings, Ltd. (Symbol – FJHL)

Ladies/Gentlemen:

You are entitled to rely on this letter in determining whether(the “Issuer”) Fovea Jewelry Holdings, Ltd. has made adequate current information publicly available within the meaning of Rule 144(c)(2) under the Securities Act of 1933.

I am a resident of the United States and have been retained by the Issuer for the purpose of rendering this letter and related matters. This firm’s relationship with the Issuer includes, over and above writing this letter, serving as special securities counsel for the Issuer, which duties include preparing or reviewing disclosure information and press releases, interfacing with the chief financial officer and giving general legal advice to management. I do not beneficially own any shares of the Issuer’s securities. I have not received, nor do I have an agreement to receive in the future, shares of the Issuer’s securities in payment for my services.

I have examined such corporate records and other documents and such questions of law as I have considered necessary or appropriate for purposes of writing this letter. In all such examinations, I have assumed the genuineness of all signatures, the authenticity of all documents submitted to me as originals, the conformity to original documents of all documents submitted to me as copies and the authenticity of all originals of such documents submitted as copies. Further, in all such examinations, I may have relied on information obtained from public officials, officers of the Issuer, and other sources, and represent that all such sources are believed to be reliable.

This letter relates to the laws of the United States, specifically Federal securities law. I have been a member in good standing of the bar of the State of California since 1970, and am permitted to practice before the Securities and Exchange Commission (the “SEC”) and I have not been prohibited from practice thereunder. This letter does not rely on the work of any other counsel.

I am not currently, nor have I been in the past five years, suspended or barred from practicing law in any state or jurisdiction, nor charged in a civil or criminal case. Furthermore, I have not in the past five years, been the subject of an investigation, hearing, or proceeding by the SEC,

the U.S Commodity Futures Trading Commission (CFTC), the Financial Industry Regulatory Authority (FINRA), or any other federal, state, or foreign regulatory agency.

The Issuer is not a reporting company and, therefore, has not filed annual or other reports with the SEC. I have reviewed publicly available information relating to the Issuer including: (i) the Issuer's profile posted on the OTC Markets Group's website; (ii) its Annual Information Disclosure Statement for the period ending December 31, 2019 and its unaudited financial statements for the fiscal year ended December 31, 2019, filed with the OTC Markets Group on March 12, 2020; (iii) its Quarterly Reports and its associated unaudited financial statements for those quarters ended March 31, 2019; June 30, 2019 and September 30, 2019, filed with the OTC Markets Group on June 13, 2019, August 7, 2019 and November 6, 2019; and (iv) its Supplemental Information - Current Report dated August 9, 2019 and filed with the OTC Markets Group on August 19, 2019. As stated, the Company's financial statements provided in the Information have not been audited.

It is my opinion that the Information (i) constitutes adequate current public information concerning the Issuer's securities and it 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 be required to obtain from the Issuer to publish a quotation for the Securities pursuant to Rule 15c2-11 under the Securities Exchange Act of 1934 (the "Exchange Act"); (iii) complies as to form with the OTC Markets Group's Pink Basic Disclosure Guidelines which are located on the Internet at www.otcmarkets.com; and (iv) has been posted through the OTC Disclosure and News Service.

The person responsible for the preparation, compilation and review of the financial statements contained in the Information for management is Chan Ka Ki. Mr. Chan is a member of The Hong Kong Institute of Certified Public Accountants, member number A23184 since 2007 and has been a member of CPA Australia since 2006. Mr. Chan graduated from Monash University in Australia with a Bachelor's Degree in Business Accounting.

The Company's transfer agent is Signature Stock Transfer, Inc., 14673 Midway Road, Suite 220, Addison, TX 75001; tel: (972) 612-4120, and is registered with the SEC under the Exchange Act. I have reviewed a copy of the Transaction Journal and tally sheet prepared by the transfer agent for the period ending December 31, 2019 to confirm that the number of outstanding shares set forth in the Annual Disclosure Statement is correct.

I have personally met with Jianmin Zhang, the sole director and statutory officer of the Issuer through his business associate/interpreter Mr. Chan. Mr. Zhang speaks only Chinese. Mr. Zhang reviewed the Information published by the Issuer through the OTC Disclosure and News Service with his bilingual interpreter. I then discussed that Information with Mr. Zhang through the interpreter. The focus of our discussion was the content of the currently filed reports, the need to file reports required by the OTC Pink Basic Disclosure Guidelines v. 2.1, December 2019 on a timely basis, and the expanded disclosure requirements included in this new version as compared to its predecessor.

To the best of my knowledge, after inquiry of the Issuer's sole statutory officer and director, neither counsel nor any officer, director nor 5% holder of the securities of the Issuer is currently

under investigation by any federal or state regulatory authority for any violation of federal or states securities laws.

No person other than the OTC Markets Group is entitled to rely on this letter. However, I hereby grant the OTC Markets Group full and complete permission and rights to publish the letter through the OTC Disclosure and News Service for viewing by the public and regulators.

I have reviewed the Issuer's financial records from the commencement of its stock trading in any public market to present time to determine whether it 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. On December 27, 2013, Robert L. Stevens was appointed Custodian/Receiver of the Issuer by the District Court, City and County of Denver, Colorado (Case No. 2013-CV-32995). On April 14, 2014, the Court entered its Order to discharge the Receiver. From the entry of that order through at least the end of 2016 the issuer generated no revenue, nor has it incurred what could reasonably be characterized as usual operating expenses. In that same time frame the issuer's financial statements reflect only no or nominal assets each fiscal year. The issuer has not yet undertaken the "cure" provided in Rule 144(i)(2). It is my opinion that, by reason of these facts, the issuer is now a "shell company" as defined in Rules 405 of the Securities Act of 1933 and 12b-2 of the Exchange Act of 1934.

I trust this information complies with your request. If you need additional information please contact me.

Very truly yours,

LAW OFFICES OF ROBERT J. HUSTON III

A handwritten signature in black ink, appearing to read "Robert J. Huston III". The signature is written in a cursive style with a horizontal line at the end.

Robert J. Huston III

RJH:tp