

LAW OFFICE OF ANDREW COLDICUTT

1220 Rosecrans Street, PMB 258  
San Diego, CA 92106  
p. 619.228.4970  
e. Andrew@ColdicuttLaw.com  
www.ColdicuttLaw.com

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March 27, 2020

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

**Re: No Borders, Inc.**  
**Trading symbol: NBDR**

Ladies and Gentlemen:

I have been engaged as special counsel to No Borders, Inc., a Nevada corporation with its executive office located at 18716 E. Old Beau Trail, Queen Creek, AZ 85142 ("Issuer"), to provide this letter with respect to the information ("Information") publicly disclosed by the Issuer and published through the OTC Disclosure and News Service, including all information published at <http://www.otcmarkets.com/stock/NBDR/profile> and related pages. The current Disclosure Statement is prepared using the OTC Pink Basic Disclosure Guidelines (v2.1 December 2019). The Issuer's common stock ("Securities") is quoted on OTC Markets as an OTCPink and is traded on the over-the-counter market. Please be advised that OTC Markets Group is entitled to rely on this letter in determining whether the Issuer has made adequate current public information publicly available within the meaning of Rule 144(c)(2) under the Securities Act of 1933 ("Securities Act"). It should be noted that Rule 144(c)(2) does not define or provide a standard for public availability of information. In using this term, I refer to any information which is available to the public from any source, including information which requires payment of a fee to a public official. In particular, the Rule does not require publication of information on or through the OTC Disclosure and News Service.

The Information covered by this opinion includes and is limited to information under the Issuer's control on the "Company Info" page and the items of information indexed on the "Disclosure" page, as follows:

<u>OTC Information Item</u>	<u>Period End Date</u>	<u>Published Date</u>
Annual Report - Condensed Unaudited Financial & Disclosure Statements For The Year Ended December 31, 2019	12/31/2019	3/27/2020

I am a resident of the United States of America. From time to time, I have provided and expect to provide legal services to the Issuer in the areas of corporate, business transactions and securities law I currently own one million fifty thousand (1,050,000) shares of restricted common stock of the Company, which were issued as of July 24, 2019. I have received shares in the past as a bonus in connection to services rendered but have no agreement to receive in the future any shares of the Issuer's stock in payment for services. I now have and have had no relationship with the Issuer, except as set forth above. I am licensed to practice law in California. The subject matter of this letter covers the jurisdictions of the State of Nevada (the Issuer's jurisdiction of incorporation) specifically limited to matters under the Nevada Revised Statutes and the laws of the United States of America. I have not relied on the work of any other attorney in rendering the opinions set forth below. I am permitted to practice before the U.S. Securities and Exchange Commission and am not prohibited from such practice. I am not currently nor have been, in the past five years, suspended or barred from practicing in any state or jurisdiction, and have not been charged in a civil or criminal case.

For the purpose of this letter, I have reviewed, to the extent I deem relevant to the matters covered by this letter, and relied upon the following:

Documents publicly available:

- a true copy of the Articles of Incorporation the Issuer and all amendments thereto, originally filed on September 14, 1999;
- the bylaws of the Issuer dated September 14, 1999.
- information published by the Issuer through the OTC Disclosure and News Service on OTCMarkets at the Internet address of <http://www.otcmarkets.com/stock/NBDR/profile> and related pages, in particular, the documents listed on the "Filings" page in the active category;
  - Company's financial statements for the year ended December 31, 2019, including:
    - (A) Unaudited Condensed Consolidated Balance Sheets as of December 31, 2019 and December 31, 2018,
    - (B) Unaudited Condensed Consolidated Statements of Operations for the years ended December 31, 2019 and December 31, 2018,
    - (C) Unaudited Condensed Consolidated Statement of Shareholders Equity (Deficit) for the years ended December 31, 2019 and December 31, 2018,
    - (D) Unaudited Condensed Consolidated Statements of Cash Flows for the years ended December 31, 2018 through December 31, 2019,
    - (E) Notes to the Condensed Consolidated Financial Statements; and,

Documents not publicly available:

- a confirmation of the shareholder report and transaction journal as of December 31, 2019, of the Issuer ("Shareholder Report") provided to me by the Company and the Transfer Agent.

I have also reviewed and relied upon such other documents and certificates of the Issuer and of public officials as I have deemed necessary and relevant to the subject matter of this letter. I have assumed the due and proper election or appointment of all persons signing and purporting to sign the documents in their respective capacities, as stated therein, the genuineness of all signatures, the conformity to authentic original documents of the copies of all such documents submitted to me as certified, true, conformed and photocopied, including the quoted, extracted, excerpted and reprocessed text of such documents. As to matters of fact, I have relied on information obtained from public officials, officers of the Issuer and other sources, which I believe to be reliable.

I have also reviewed and am familiar with Rule 144 under the Securities Act and Rule 15c2-11 under the Securities Exchange Act of 1934 (the "Exchange Act"). It should be noted that the only information required by Rule 144(c)(2) that is required to be publicly available is limited to the information identified in paragraphs (a)(5)(i) to (xiv) and (a)(5)(xvi) of Rule 15c2-11. The required information is less extensive than the information identified in OTC Pink Basic Disclosure Guidelines v2.1 December 2019. It should be noted that the OTC Markets "Alternative Reporting Standard" is a voluntary, privately operated system unrelated to the statutory reporting requirements set forth in Sections 13 and 15(d) of the Exchange Act.

The Information (i) constitutes "adequate current public information" concerning the Securities and the Issuer and "is available" within my understanding of 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 OTC Markets Group's Pink Basic Disclosure Guidelines v2.1 December 2019, 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.

I have been advised by the Issuer that Brian Campbell of NowCFO is responsible for the preparation of the financial statements contained in the Annual Report. Mr. Campbell's address is 2424 S.E. Bristol St., Suite 280, Newport Beach, CA, 92260. The financial statements are not audited. Mr. Campbell's, qualifications to prepare the financial statements stem from him being a Certified Public Accountant, and his previous and ongoing public company accounting experience with other public companies. The primary officer reviewing and approving the Company's financial statements is Mr. Joseph Snyder the Issuer's CEO. Mr. Snyder, Jr., has over 19 years of experience running companies and sales teams. Mr. Snyder has built multiple private companies from incorporation to millions in revenue

and value over his career, he has also acquired national multimillion-dollar businesses and has served as a County Commissioner in Kern County, California.

The Transfer Agent, Pacific Stock Transfer Co., is registered with the SEC, and its address is 6725 Via Austi Parkway, Suite 300, Las Vegas, NV 89119. I confirmed the number of outstanding shares of the Issuer set forth in the Information by reviewing (i) the shareholder report as of 12/31/2019, provided by the Issuer's Transfer Agent; (ii) the transfer journal through the year ended 12/31/2019, provided by the Transfer Agent; and (iii) the Issuer's, share issuance table as of 12/31/2019, provided by the Company.

The SEC, as of May 2016, is conducting a fact-finding investigation, into whether, I, or others associated with various publicly traded companies, may have engaged in securities registration violations by participating in filing registration statements which may contain false information about those companies' control persons or promoters. The SEC's is also conducting a fact-finding investigation into whether or not, attorney opinion letters were authored that are potentially false and misleading and that may be part of unregistered distributions of securities. The SEC to date, has not determined that I have violated any securities laws.

I have personally met with management and a majority of the directors of the Issuer, namely, Joseph Snyder (CEO / Director), Cynthia Tanabe (CFO / Director), Christopher Brown (Director), via (i) Video Conference calls, as well as in person meetings, (ii) reviewed the Information, as amended, published by the Issuer through the OTC Disclosure and News Service and (iii) discussed the Information with management and a majority of the directors of the Issuer.

To the best of my knowledge, after inquiry of management and a majority of the directors of the Issuer, neither the Issuer, or any five percent holder of the Issuer's securities is, currently under investigation by any federal or state regulatory authority for any violation of federal or states securities laws.

The Issuer has been a "shell company" in its past, as defined in Rules 405 of the Securities Act of 1933 and 12b-2 of the Exchange Act of 1934.

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

- a. I have assumed that (i) all information in all documents reviewed by counsel is true and correct, (ii) all signatures on all documents reviewed by myself are genuine, (iii) all documents submitted to myself as originals are true and complete, (iv) all documents submitted to myself as copies are true and complete copies of the originals thereof, and (v) each natural person signing any document reviewed by myself had the legal capacity to do so.
- b. I have made no independent investigation as to the accuracy or completeness of any factual matters contained in the records, documents and certificates that I have reviewed in connection with the foregoing opinion.

No person other than OTC Markets is entitled to rely on this letter. Notwithstanding this limitation of reliance, I hereby grant OTC Markets full and complete permission and right to publish this letter through the OTC Disclosure and News Service for viewing by the public and regulatory agencies; provided, that such permission to publish and the publication hereof shall not be deemed a waiver of the limitations of reliance set forth in this paragraph.

Yours Truly,

/s/Andrew Coldicutt

Andrew Coldicutt