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August 16, 2024

OTC Markets Group, Inc.
300 Vesey Street, 12th Floor
New York, NY 10282

Re: Attorney Letter with Respect to Adequate Current Information, Continuing Disclosure Obligations of Silverton Adventures, Inc., a North Carolina Corporation (the “Issuer”) for the annual report and period ending June 30, 2024, and quarterly reports for the periods ending March 31, 2024, December 31, 2023 and September 2023.

To Whom It May Concern:

This firm has been engaged by Silverton Adventures, Inc., a North Carolina Corporation (the “Issuer”), as general counsel, including, but not limited to, for the purpose of rendering this letter and related matters.

This letter may be posted on the OTC Disclosure and News Service for viewing by the general public. OTC Markets Group, Inc. (“OTC”) may rely on this opinion in determining whether the Issuer has made adequate current information publicly available within the meaning of Rule 144(c)(2) of the Securities Act of 1933, as amended (the “Securities Act”).

The undersigned counsel (“Counsel”) is licensed in the State of New York and is a resident of the State of New York. The subject matter of this letter covers the jurisdiction of the State of North Carolina (the Issuer’s state of incorporation) and the laws of the United States. Counsel is permitted to practice before the Securities Exchange Commission (“SEC”) and has not been prohibited from practice thereunder. Counsel has not ever been suspended or barred from practicing law in the State of New York or in any other jurisdiction, nor has Counsel ever been charged in any civil or criminal case or been the subject of an investigation, hearing, or proceeding by the SEC, the US Commodity Futures Trading Commission, FINRA, or any other federal, state or foreign regulatory agency. Counsel is current in his membership requirements for the State of New York. Counsel does not beneficially own any shares of Issuer’s common stock, nor does Counsel have any current agreements to receive, whether now or in the future, shares of Issuer common stock as compensation for preparation of this letter or for any other services.

This firm has been retained by the Issuer for the purpose of reviewing the current information supplied by the Issuer and has been retained as outside counsel for other matters. Counsel has examined such corporate

records and other documents and such questions of law as Counsel considered necessary or appropriate for the purposes of rendering this letter.

For purposes of this opinion Counsel has reviewed the following:

1. Articles of Incorporation and Amendments of the Articles of Incorporation of the Issuer;
2. Corporate By-Laws;
3. *Information*, as defined below; and,
4. Such other corporate records as were necessary and provided by management for purposes of this letter, including press releases and past and current financial statements have examined such corporate records and other documents and such questions of law as Counsel considered necessary or appropriate for purposes of rendering this letter.

The opinion and conclusions herein are based upon documentation and facts made available by the Issuer and are based on the presumed accuracy of those documents and facts. All such information is believed to be true and such sources of information are believed to be reliable. As to matters of fact, Counsel relied on information obtained from public officials, officers of the Issuer and other sources, and believed such information to be true and such sources of information are believed to be reliable. If the facts and information in all such documents are determined not to be true, this opinion shall be null and void.

The Issuer posted on the OTC Disclosure and News Service the following report (hereinafter collectively “Information”):

<u>Publish Date</u>	<u>Report Title</u>	<u>Period End Date</u>
August 12, 2024	Amended Annual Report - For the Year ended June 30, 2024, which included the following unaudited Financial Statements: <ul style="list-style-type: none"> • Balance Sheet • Statement of Operations • Statement of Stockholder’s Equity • Statement of Cashflows • Notes to Financial Statements 	June 30, 2024
May 8, 2024	Quarterly Report - For the Period ended March 31, 2024, which included the following unaudited Financial Statements: <ul style="list-style-type: none"> • Balance Sheet • Statement of Operations • Statement of Stockholder’s Equity • Statement of Cashflows • Notes to Financial Statements 	March 31, 2024
February 3, 2024	Quarterly Report - For the Period ended December 31, 2023, which included the following unaudited Financial Statements: <ul style="list-style-type: none"> • Balance Sheet • Statement of Operations • Statement of Stockholder’s Equity • Statement of Cashflows • Notes to Financial Statements 	December 31, 2023
October 16, 2023	Quarterly Report - For the Period ended September 30, 2023, which included the following unaudited Financial Statements: <ul style="list-style-type: none"> • Balance Sheet 	September 30, 2023

	<ul style="list-style-type: none"> • Statement of Operations • Statement of Stockholder’s Equity • Statement of Cashflows • Notes to Financial Statements 	
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Counsel is of the belief and opinion the Information (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. (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 Group’s Pink Basic Disclosure Guidelines, which are located on the Internet at www.otcmarkets.com, and (iv) has been posted on the OTC Disclosure and News Service.

The financial statements contained in the Information above are unaudited and were prepared by the sole director and officer of the Issuer, Heung Kwok David Mui, who has over 30 years’ experience in corporate finance and business administration and possess a Master of Business Administration.

The transfer agent for the Issuer is:

Pacific Stock Transfer Company
6725 Via Austin Parkway, Suite 300
Las Vegas, NV 89119
(800) 785-7782

The Transfer Agent is listed with the Commission and has Depository Trust Corporation approval. For the relevant period, the Issuer had the following number of shares of Common Stock issued and outstanding:

<u>Period End Date</u>	<u>Shares Issued & Outstanding</u>
June 30, 2024	10,057,491,143
March 31, 2024	10,057,491,143
December 31, 2023	10,057,491,143
September 30, 2023	10,057,491,143

Counsel confirmed these figures by reviewing records issued by the Transfer Agent.

The corporate offices of the issuer are located at Room 1302, 13/F, Billion Trade Centre, 31 Hung To Road, Ngau Tau Kok, Kowloon, Hong Kong and its phone number is +852 6712 8389.

The Issuer was originally incorporated in 2006 under the laws of the state of Nevada as Mor Travel, Inc. In December of 2007, the Issuer’s name was changed to Silverton Adventures, Inc. In 2014, the Issuer redomiciled to the state of Wyoming. From inception until through 2014, the Issuer provided through its subsidiaries, printing and mailing services in addition to children’s DVDs and programs. In February 2019, the issuer’s jurisdiction of incorporation changed from Wyoming to North Carolina. The company engages in the business of sales and marketing of high-quality products and services with both online and offline sales and marketing platforms.

Pursuant to the Issuer’s unaudited financial statements filed with its Annual Report, the Issuer’s reported assets and revenues were as follows:

<u>Period End Date</u>	<u>Assets</u>	<u>Revenues</u>
June 30, 2024	\$ 195,340	\$ 61,538
March 31, 2024	\$ 227,840	\$ 49,999
December 31, 2023	\$ 260,340	\$ 38,462
September 30, 2023	\$ 212,840	\$ 23,077

Counsel has reviewed the Information in conjunction with its preparation of this letter and finds the Information suitable and ready for public disclosure. Counsel has also personally met and discussed the Information provided to OTC Disclosure and News Service via conference call with Heung Kwok David Mui, the Issuer's sole officer and director as of the date of this opinion.

To best of Counsel's knowledge, after inquiry of management and the directors of the Issuer, neither Issuer nor any 5% holder of common stock of the Issuer is currently under investigation by any federal or state regulatory authority for any violation of federal or state securities laws.

Counsel has reviewed the Information and the Issuer's financial statements, insofar as they are available, to ascertain if the Issuer, or its predecessor(s), is or ever was a "shell company" as defined in Rules 405 of the Securities Act and the Exchange Act. A "shell company" is defined as an entity that has (A) no or nominal operations; and (B) either: (1) No or nominal assets; (2) Assets consisting solely of cash and cash equivalents; or (3) Assets consisting of any amount of cash and cash equivalents and nominal other assets. As a result of Counsel's review of the Issuer's available financial statements, Counsel is of the opinion that the Issuer currently is not a shell company. As an alternative reporting issuer and pursuant to Rule 144, shell status will be considered cured twelve months after the Issuer has filed Form 10 information with the SEC, provided the Issuer remains current in its SEC filing obligations thereafter.

In rendering the statements set forth in this Letter, Counsel assumes the following:

- (a) the legal capacity of each natural person;
- (b) the power and authority of each person other than the issuer or person(s) acting on behalf of the Issuer to execute, deliver and perform each document executed and delivered and to do each other act done or to be done by such person;
- (c) the authorization, execution and delivery by each person other than the Issuer or person(s) acting on behalf of the Issuer of each document executed and delivered or to be executed and delivered by such person;
- (d) that there have been no undisclosed modifications of any provision of any document reviewed by this Counsel in connection with rendering the statements set forth in this Letter;
- (e) the genuineness of each signature, the completeness of each document submitted to this Counsel, the authenticity of each document reviewed by this Counsel as an original, the conformity to the original of each document reviewed by this Counsel as a copy and the authenticity of the original of each document received by this Counsel as a copy;
- (f) the truthfulness of each statement as to all factual matter otherwise not known to this Counsel to be untruthful contained in any document encompassed within the due diligence review undertaken by this Counsel;
- (g) the accuracy on the date of this Letter as well as on the date stated in all governmental certifications of each statement as to each factual matter contained in such governmental certifications; and,
- (h) that with respect to the information reviewed and to the transactions referred to therein, there has been no mutual mistake of fact and there exists no fraud or duress.

The qualification of any statement with respect to the existence or absence of facts by the phrase “to our knowledge” or “known to us” means the actual knowledge of the attorneys at this firm involved with the review and negotiation of the information reviewed. We have not conducted an independent audit of the Issuer or its files.

This opinion may be posted on the OTC Disclosure and News Service for viewing by the general public and OTC may rely on said opinion in determining whether Issuer has made adequate current information publicly available within the meaning of Rule 144(c)(2) of the Securities Act. This opinion letter is not to be relied on by any other party or for any other purposes. Notwithstanding the foregoing, OTC is granted full and complete permission and rights to publish this letter through the OTC Disclosure and New Service for viewing the public and regulators.

In rendering the conclusion contained herein, I advise you that I am a member of the State Bar of New York and express no opinion herein concerning the applicability or effect of any laws of any other jurisdiction, except the securities laws of the United States of America referred to herein, as applicable.

Should any further disclosures be made to OTC, as required or requested by OTC, or the issuer, please feel free to contact me at (212) 448-1100. Thank you for your attention to this matter.

Yours truly,

/s/ Steven Schuster

Steven Schuster