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Wilson-Davis & Co., Inc.
236 S. Main
Salt Lake City, Utah

RE: Opinion Regarding Non-Shell Status
Halitron, Inc. (OTC Pink: HAON)

Dear Sir or Madam,

I have been engaged for the sole purpose of providing an opinion with respect to "shell" status for Halitron, Inc., a Nevada corporation (the "Issuer"). The Issuer requested I provide this opinion in support of the contemplated reliance on the exemption from registration provided by Rule 144, promulgated under the Securities Act of 1933 (the "Act"). Nothing herein opines as to the efficacy of such reliance by any stockholder of the Issuer. Furthermore, separate opinion finding that any securities of the Issuer may be sold pursuant to an exemption from registration provided for by Rule 144, promulgated under the Act, has been issued to the stockholder and the Issuer's transfer agent.

I am an attorney licensed to practice before the Supreme Court of Illinois and the Court of Appeals for the Seventh Circuit. Moreover, I have not been prohibited or otherwise enjoined from practicing before the Securities and Exchange Commission or any national securities exchange. The Stockholder has compensated me for the provision of this opinion.

"Shell" Company Status

A shell company is a registrant with no or nominal operations and either no or nominal assets, assets consisting solely of cash and cash equivalents, or assets consisting of any amount of cash and cash equivalents and nominal other assets. For purposes of this definition, the determination of shell status is predicated upon the registrant's balance sheet as prepared in accordance with U.S. Generally Accepted Accounting Principals.

In June 2005, the Securities and Exchange Commission adopted amendments to Forms 10-K, 10-Q and 20-F to add a box to the cover page of such forms that the registrant must mark to indicate whether it is a "shell" company. The identification of a shell company or non-shell company status on the cover page constitutes required disclosure under applicable federal securities laws.

The use of Rule 144 is generally not available for shell companies or former shell companies whose filings are delinquent. A former shell company, however, may avail itself of Rule 144 when it meets certain curative provisions:

(i) the registrant is subject to the reporting requirements of Section 13 or Section 15(d); (ii) the registrant has been current under such reporting requirements for a period of twelve (12) months (or any shorter period that the registrant has been subject to reporting requirements); and (iii) the registrant has filed current "Form 10" information indicating that it is no longer a shell company.

In connection with the opinion contained herein, I have reviewed applicable federal laws, rules and regulations, including, specifically, Rule 144 promulgated under Section 5 thereof. Moreover, I have examined originals or copies, certified or otherwise identified to my satisfaction, of such documents, certificates or records provided to me by Shareholder as I have deemed necessary or appropriate as bases for the opinion set forth herein. This includes, specifically: (a) the Issuer's initial report and 2014 2nd quarter Reports filed with OTC Markets on Jul 31, 2014 for the periods ending June 30, 2014 (b) the Issuer's most recent Annual Report filed OTC Markets for the period ending December 31, 2014 dated March 31, 2015 (c) the Issuer's March 31, 2015 Financial and disclosure reports and filed Jul 6, 2015 and (d) the issuers most recent Quarterly Report filed with OTC Markets on Sep 17, 2015, for the period ending June 30, 2015. In my examination, I have assumed the legal capacity of all natural persons, 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 certified or photostatic copies and the authenticity of the originals of such copies.

The Issuer

The Issuer is a Nevada Corporation, incorporated January 29, 2003 whose common equity securities are quoted on the OTC Pink Marketplace under the ticker symbol "HAON". The issuer is not subject to the reporting requirements of Section 13 or 15(d) of the Securities Exchange Act of 1934 (the "Exchange Act"). The Issuer was subject to custodial action by the Nevada state District Court Clark County Nevada Case #A-14-702016-B and has made "current public information" available as defined by Rule 144(c)(2). The Issuer has never identified itself as a "shell" company within the meaning of Rule 12b-2 promulgated under the Act.

From inception in 2003 through 2008 the Company filed timely reports to the SEC. In discussions with current Management in reference to the period 2008 through 2013, the business changed from a fully developed manufacturer and developer of software technology to a licensing model. In addition, it became apparent that the benefits of a public company were too costly and the company filed a form 15 which withdrew its obligation to file SEC reports, effectively becoming a non-reporting entity

TekNik Digital Arts has license agreements with Codefire Acquisition Corp, a merchandising agreement with NBC Enterprises, Inc., Joint venture agreements with PED PAD, LLC, Powergrid Fitness, LLC, Sponsorship and Development Agreements with Buddy Rice Racing, Inc. and Kentucky Eleven.

The company and its subsidiaries has 2 active participants listed in corporate documents through 2014, the 401K plan was active through 2013 with asset values around $2,500, two trademarks were canceled in 2014, and the TekNik website just expired November 1st, 2015.
Currently, the technology business sells draft contracts for a modest fee through www.techagreemnets.com. In summary, the Company's active corporate members have a current 401K plan, trademark activity, and the nominal sales of technology draft contracts are all operating aspects to the business.

Legal Opinion

Specifically, in conjunction with my own due diligence, I have determined that: (a) The Issuer generated receivables of $83,456, year to date (June 30, 2015) revenues of 4421,618, against operating costs of 669,060 for the period ending June 30, 2015 for a net operating loss of $227,242 indicating that the Issuer is actively engaged in business and; (b) The Issuer represents long term debt financing of $162,000 for the period ending June 30, 2015 indicating that the Issuer has attracted and incurred sizable debt financing to develop and maintain operations.

Based upon the foregoing it is my opinion that the Issuer is not now, nor ever has been, deemed a shell company as defined by Rule 405 of the Act and Rule 12b-2 of the Securities Exchange Act.

The opinion provided herein is subject to the assumptions and conditions in this letter and is necessarily based on the information made available to me, as of the date of this letter. I assume no responsibility, and do not intend to update or revise this opinion based on circumstances or events occurring after the date of this letter. The Issuer may produce, publish or quote this letter, or portions thereof, as reasonably necessary to ensure its compliance with applicable laws and regulations.

Respectfully submitted,

Elisa T. Drew

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