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December 15, 2015

OTC Market Group, Inc
304 Hudson Street Second
Floor Second Floor New York NY 10013

Re: Halitron, Inc. (HAON)

Ladies/Gentlemen:

I am a United States citizen, licensed to practice law in the State of Illinois and before the Securities and Exchange Commission. This law firm was retained by Halitron, Inc. to render an opinion as to the adequacy of the current information posted to OTC Market's disclosure and news service website.

As to matters of fact, I have assumed the genuineness of all signatures set forth on each document, the authenticity of all original documents and the conformity to original documents of all copies of such documents as may have been supplied to us; during the course of my examination I have relied upon information from public officials, officers of the Issuer and other sources, all of which I believed to be reliable.

I have carefully reviewed all of the issuer's previous disclosure and financial Statements including those statements for the periods ending December 31, 2014 posted April 20, 2015, September 30, 2015 and posted to the OTC Market website on December 3, 2015 and December 4, 2015.

Based on the examination and inquiry set forth above, I am of opinion that the Information: (a) constitutes "adequate current public information" concerning the common stock of the Company quoted on the OTC Markets ("Securities") and the Company itself, and "is available" within the meaning of Rule 144(c)(2) under the Securities Act; (b) includes all of the information that a broker-dealer would be required to obtain from the Company to publish a quotation for the Securities under Rule 15c2-11 under the Securities Exchange Act of 1934, as amended ("Exchange Act"); (c) complies as to form with the OTC Markets' Guidelines for Providing Adequate Current Information, which are located on the Internet at <http://www.otcm Markets.com/learn/otc-company-reporting> and (d) has been posted through the OTC Disclosure and News Service.

The person responsible for the preparation of the Issuer's financial and disclosure statements contained herein is Bernard Findley. The statements are prepared in conformity with accounting principles generally accepted in the United States. In all material respects, they fairly present the financial position results of operations and cash flows for the periods presented. Mr. Findley's experience and knowledge of accounting qualifies him to prepare the company's un-audited financial documents

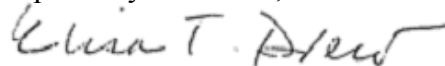
In reaching my conclusions, I have had numerous emails and telephone conversations with the corporate management. I have assumed the genuineness of all signatures on any documents not executed in my presence.

I have personally met and consulted with management and the majority of the directors of the company to discuss the information provided to me. To the best of my knowledge, I believe all such sources to be reliable.

- a) The Current Information posted by the Company constitutes adequate current public information and is publicly available as those terms are defined within the meaning of (i) Rule 144(c)(2) under the Securities Act; and (ii) As outlined in Rule 15c2-11 (a)(5i) through paragraph (a)(5)(xiv) and paragraph (a)(5)(xvi)
- b) The aforementioned Information Statement complies as to form and content with the Pink OTC Market's guidelines for Providing Adequate Current Information as published by the Pink OTC Markets
- c) To the best of my knowledge, neither the members of management, a holder of 5% or more of the company's securities, or counsel is currently under investigation by any federal or state regulatory authority for any violation of federal or state securities laws nor am I under investigation for any such violation
- d) Counsel was supplied with Halitron's current stock register as prepared by First American Stock Transfer, Inc which is registered under the Exchange Act

I have based the opinions and conclusions expressed herein upon the facts that have been provided to me by the Company, and on the accuracy of those facts and representations. In the event such facts and representations are determined not to be true, this opinion shall be invalid, and have no legal effect with respect to the various entities relying upon said opinion. This opinion is in conjunction with the Company's Current disclosure documents and may be posted on the Pink Market OTC News Service for viewing by the public; only Pink OTC Markets, Inc 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.

Respectfully submitted,



Elisa T. Drew,
Attorney at Law