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March 30, 2016

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

Re: GainClients, Inc.

Dear Sir or Madam:

This law firm has been retained by GainClients, Inc. (the "Company") for the purpose of rendering this opinion as to whether there is adequate current information available on the OTC Disclosure and News Service regarding GainClients, Inc. (the "Company" or the "Issuer"). OTC Markets Group, Inc. is entitled to rely on such opinion in determining whether the Issuer has made adequate current Information publicly available within the meaning of Rule 144(c)(2) under the Securities Act of 1933. We also confirm that each member of our law firm is a U.S. resident and that we have been retained by the Issuer for the purpose of rendering this opinion.

We 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. We are authorized to practice law in the State of Florida. Our law firm is permitted to practice before the Securities and Exchange Commission (the "SEC") and has not been prohibited from practice thereunder.

As to matters of fact, we relied on information obtained from public officials, officers of the Issuer and other sources, where such sources are believed to be reliable. In rendering this opinion, we have examined such corporate records and other documents, including but not limited to, the following documents:

1. On May 13, 2014, the Issuer posted its Quarterly report for the period ending March 31, 2014.

2. On August 11, 2014, the Issuer posted its Quarterly report for the period ending June 30, 2014.

3. On November 19, 2014, the Issuer posted its Quarterly report for the period ending September 30, 2014.

4. On March 31, 2015, the Issuer posted its Annual report for the period ending December 31, 2014.

5. On May 19, 2015, the Issuer posted its Quarterly report for the period ending March 31, 2015.

6. On August 14, 2015, the Issuer posted its Quarterly report for the period ending June 30, 2015.

7. On November 19, 2015, the Issuer posted its Quarterly report for the period ending September 30, 2015.

8. On March 29, 2015, the Issuer posted its Annual report for the period ending December 31, 2015.

We have assumed that (i) all information contained in all documents reviewed by us is true and correct; (ii) all signatures on these documents reviewed by this firm are genuine; (iii) all documents submitted to this firm as originals are true and complete; (iv) all documents submitted to this firm as copies are true and complete copies of the originals thereof; and (v) each natural person signing any document reviewed by me had the legal capacity to do so.

As corporate securities counsel to the Company, we are familiar with its management and have (i) met with management of the Issuer, (ii) reviewed the Issuer's Disclosures published by the Issuer on the OTC Disclosure and News Service, and (iii) discussed the Information with management.

It is our belief that there is current information publicly available within the meaning of Rule 144(c)(2) under the Securities Act of 1933, as amended, and such documents were posted in the OTC Disclosure and News Service, and 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") and complies as to form with the OTC Markets, Inc. Guidelines for Providing Adequate Current Information.

The Issuer's unaudited financial statements were prepared by John C. Cho, CPA of JC Accounting & Consulting, PLLC, 2476 E. River Road, Tucson, AZ 85718. Mr. Cho is qualified to produce the financial statements by virtue of being a licensed CPA and familiar with GAAP and standard accounting and bookkeeping disclosure.

The Issuer's transfer agent is Interwest Transfer Company, 1981 East Murry-Holladay Road, Suite 100, Salt Lake City, UT 84117, Telephone (801) 272-9294; Fax (801) 277-3147. Interwest Transfer Company is registered with the Securities and Exchange Commission. The method used to confirm the number of outstanding shares of the Issuers stock as set forth in the Information Statement was through email contact with the transfer agent and on March 30, 2016 the undersigned received an email confirmation that the as of March 30, 2016 there were 271,915,512 shares of common stock issued and outstanding and 1,600,000 shares of Series A Preferred Stock issued and outstanding.

Our law firm is corporate securities counsel to the Company, is familiar with its management and has (i) met with management and a majority of the directors of the Issuer, (ii) reviewed the Information, as amended, published by the Issuer on the OTC Disclosure and News Service, and (iii) discussed the Information with management.

To the best knowledge of counsel, after inquiry of management and the directors of the Issuer, neither the Issuer of the Securities, any stockholder, or our law firm is currently under investigation by any federal or state regulatory authority for any violation of federal or states securities laws.

No entity other than OTC Markets Group, Inc. is entitled to rely on it, but Pink OTC Markets, Inc. has full and complete permission and rights to publish this letter in the OTC Disclosure and News Service for viewing by the public and regulators.

Very truly yours,

/s/ Eric P. Littman
Eric P. Littman
EPL/ica

cc: Gainclients, Inc.