John T. Root, Jr.
ATTORNEY AT LAW
P.O. Box 701
Greenbrier, Arkansas 72058
Phone: (501) 529-8567
Fax: (501) 325-1130
j.root.5013@gmail.com

John T. Root, Jr.

April 27, 2016

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

Re: Halitron, Inc. (HAON)
Annual Information and Disclosure Statement
Years Ended December 31, 2015 and 2014, as published on April 5, 2016 and December 24, 2015, respectively, by OTC Disclosure & News Service

Ladies and Gentlemen,

My office has been engaged by Halitron, Inc. (the "Company") to be its special securities counsel. My services include preparing or reviewing disclosure information, interfacing with the Chief Accounting Officer and independent accountants, if any. I have examined such corporate records and other documents and have asked such questions of law as I have considered necessary or appropriate for the purpose of writing this letter. I have relied on publicly available information from the Secretary of State of the State of Nevada and information obtained from the Company's officers and directors. I have also reviewed the following documents published at www.OTCMarkets.com and publicly available through the OTC Disclosure and News Service in connection with the preparation of this letter:

- The Company's Annual Financial Reports for the years ended December 31, 2015 and 2014, as published on April 5, 2016 and December 24, 2015, respectively;
- The Company's Quarterly/Periodic Reports for the Quarters ended March 31, 2015, as published December 24, 2015; June 30, 2015, as published December 24, 2015 and September 30, 2015, also as published December 24, 2015;
- And such other information that I considered necessary under the specific circumstances.

I believe the sources I have relied upon to be reliable. In my examination, I have assumed the genuineness of documents and other information provided by the Company, without independent investigation.

This opinion is based expressly on the facts stated herein, and may not be relied upon in the event that other facts, not presently known to me, come to light. Opinion letters

of counsel are not binding upon the OTC Markets or the Courts, and to the extent that persons relying upon this letter may have knowledge of facts or circumstances that are contrary to those upon which this opinion is based, this opinion would not be applicable and will result in another opinion. The opinions expressed herein are limited to the Federal Law of the United States of America, specifically the Securities Act of 1933, the Rules and Regulations relating thereto, and no opinion is provided regarding any federal or state law not specifically referenced herein. I am a member in good standing of the bar of the State of Arkansas since 1990, am a resident of the United States and am permitted to practice before the Securities and Exchange Commission ("SEC") and have not been prohibited from practice thereunder.

The Company is not a reporting issuer pursuant to the Securities Exchange Act of 1934 (the "Exchange Act") and, therefore, does not file periodic reports with the SEC. The Financial Statements, as published, are unaudited.

This information constitutes, in my opinion, adequate current public information concerning the Company's securities and is available within the meaning of Rule 144(c)(2) under the Securities Act. It 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 Exchange Act and complies as to form with the OTC Market's Guidelines for Providing Adequate Current Information.

The person responsible for the preparation of the Company's financial statements is Bernard Findley. Mr. Findley has over 23 years in successively responsible management positions, which gives him unique abilities and experience, and which he utilizes to benefit Halitron, Inc. The financial statements are prepared by Mustafa Mohammad, under the supervision of Mr. Findley, who is responsible therefore. Outside preparation ensures that the financial statements comply with US GAAP rules. Mr. Findley has been involved in the industry for many years and is familiar with all aspects of Halitron, Inc.

The Company's transfer agent is First American Stock Transfer, Inc., which is registered with the SEC. The method used to confirm the number of outstanding shares of common stock set forth in the Information Statement was to obtain a written printout of the shares as shown on the transfer agent's records as to the number of outstanding shares. The transfer agent is registered with the SEC as confirmed by checking the SEC's system.

The undersigned has spoken via teleconference with management and the directors of the Company. The undersigned has reviewed the Annual Report and the most recent Quarterly Report, which includes the Corporate Disclosures, as presently published by the Company through the OTC Disclosure and News Service. The undersigned discussed the disclosed information with management and all of the directors of the Company.

To the best of my knowledge, after inquiry of management and the directors of the Company, neither counsel nor any officer, director or any 5% or greater holder of the outstanding securities of the Company is currently under investigation by any federal or state regulatory authority for any violation of federal or states securities laws.

I have compiled and list below the names of each executive officer, director, general partner and other control person of the Company and promoter, finder, consultant or any other advisor of the Company who assisted, prepared or provided information with respect to the Company's disclosure or who received securities as consideration for services rendered to the Company and the following information related to each: (i) their full name, (ii) their business address, (iii) the number and class of the Company's securities beneficially owned by each of them, (iv) with respect to each of the securities described in the preceding clause whether or not the certificate or other document that evidences the securities contains a legend stating that the securities have not been registered under the Securities Act and setting forth or referring to restrictions on transferability and sale of the securities and (v) a complete description of the consideration received by the Company in connection with each issuance of shares to any of them including, without limitation, the nature of any services performed for or on behalf of the Company. For purpose of this letter, the term "control person" includes (i) any person controlling, under common control with, or controlled by, the Company or (ii) any person who obtained securities of the Company in connection with a negotiation with the Company within the three-year period prior to the date of the opinion. With respect to any of the Company's control persons that is an entity and any parent entity of any control person, this letter provides the information for each control person of such entity or parent entity.

Mr. Bernard Findley, Title: Chief Executive Officer & Secretary, Director
Number of Shares Beneficially Owned: 165,252,165 Shares
Currently the shares are beneficially owned by Mr. Bernard Findley,
through a revocable living trust, named Consolidated 2012 TR
Address for Mr. Findley is 9 Lovells Lane
Newtown, CT 06470

Mr. John Ward, Title: None
Number of Shares Owned: 2,816,000 Shares
Address for Mr. Ward is 3104 Camelback, #509
Phoenix, AZ 85016.

Mr. Warren Wheeler, Title: None
Beneficial Ownership through ownership in Two Hundred Co, LLC,
Omega Energy, LLC and Ricochet Trading, Inc.: 33,956,000 Shares
Address for Mr. Wheeler is 212 Bradford Drive
Carencro, LA 70520

Basin Holding Co.
c/o Ms. Glenda Patin, Title: None
Beneficial ownership through voting control: 8,675,450 Shares
212 Bradford Dr.
Carencro, LA 70520

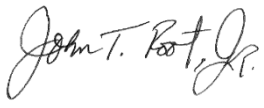
There are 10,000,000 shares of Preferred Stock authorized and outstanding.

The business address for all officers and directors, unless otherwise stated herein is: 3 Simm Lane, Suite 2F, Newtown, CT 06470

The total outstanding shares of Common Stock, as of March 29, 2016 are 521,647,657 **shares and 10,000,000 shares of Preferred Stock issued and outstanding.**

No person or entity other than OTC Markets is entitled to rely upon this opinion. OTC Markets, however, is granted full and complete permission and rights to publish this document via the OTC Disclosure and News Service for viewing by the general public and regulators. The public and OTC Markets may rely on the above in determining whether Atlas has made adequate current information publicly available within the meaning of Rule 144(c)(2) of the Securities Act of 1933. However, the information which has been published via OTC Disclosure and News Service constitutes adequate current public information, is available within the meaning of S.E.C. Rule 144(c)(2) of the Securities Act, includes all the information that a broker-dealer would be required to obtain from an issuer in order to publish a quotation for its securities pursuant to Rule 15c2-11 under the Securities Exchange Act of 1934, and complies as to form with the OTC Markets Guidelines for Providing Adequate Current Information.

Sincerely,



John T. Root, Jr.