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January 31, 2018

OTC Markets Group 304 Hudson Street - 2<sup>nd</sup> Floor New York, NY 10013

Re: Bullzi Security, Inc: SYMBOL: BLLZ - Sufficiency of Adequate Current Information

## Ladies and Gentlemen:

Please be advised that I am securities counsel to Bullzi Security, Inc., a Nevada corporation (the "Issuer"). I have been requested as securities counsel to the Issuer to render a sufficiency of adequate current information opinion (this "Opinion") in connection with the filing by the Issuer of an annual report relating to the period ended December 31, 2017 which included financial information for the periods ended December 31, 2017 and December 31, 2016 posted on OTCMarkets.com ("OTC.com") on January 26, 2018 (the "12/31/17 Annual Report") and all information previously reported on OTC.com including an annual report relating to the year ended December 31, 2010 (the "12/31/10 Annual Report") posted on the Pinksheets on February 16, 2011; a quarterly report relating to the period ended September 30, 2010 posted with the OTC.com on November 15, 2010 (the "9/30/10 Quarterly Report") and an initial company information and disclosure statement as updated on August 31, 2010 and the documents referred to therein (the "Initial Information Statement") (the aforementioned filings are hereinafter collectively referred to as the "Historical Information") and other materials referred to herein pursuant to Rule 15c2-11(a)(5) of the Securities Exchange Act of 1934 as amended (the "Exchange Act") and Rule 144(c)2 under the Securities Act of 1933, as amended (the "Securities Act").

For the reasons set forth herein, it is my opinion that the Historical Information and other documents included therein or that are exhibits thereto: (i) constitutes adequate current public information concerning the shares of common stock of the Issuer (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 shares of common stock of the Corporation (the "Securities"), under Rule 15c2-11 of the Exchange Act; (iii) complies as to form with the OTC Markets Group Guidelines for Providing Adequate Current Information, which are located on the Internet at <a href="https://www.OTCmarkets.com">www.OTCmarkets.com</a>; and (iv) has been posted on the OTC.com. Please be advised that OTC Markets Group ("OTC Group") is entitled to rely on this 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.

In rendering the Opinion, I have reviewed such corporate records and other documents as I have deemed necessary regarding the filing of the 12/31/17 Annual Report and its included information which included, but was not limited to, the Historical Information. On September 10, 2010, I personally met with Thomas and Michael Welch, the two executive officers and directors of the Issuer in White Plains, New York and performed certain due diligence inquiries, including a detailed discussion of the Issuer's operational history and operational and strategic plans. In addition, I have made such investigations and

## FRANK J. HARITON • ATTORNEY - AT - LAW

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have considered such questions of law as I deemed necessary and appropriate for the purposes of rendering this Opinion. In all such examinations, I have assumed 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 copies and the authenticity of all originals of such documents submitted as copies. Further, in all such examinations, I may have relied on information obtained from public officials, officers of the Issuer and other sources and represents that all such sources are reasonably believed to be reliable.

The person responsible for the preparation of the financial statements enumerated later in this letter and the notes thereto which have been posted to www.otcmarkets.com (the "Historical Financial Information") and the financial information contained in the 12/31/7 Annual Report is Thomas Welch who also maintains the Issuer's books and records. However, the Historical Financial Information and the financial information contained in the 12/31/17 Annual Report was also subject to a compilation review and report by TaxPro, Inc. and particularly Paul G. Sazani, CPA. The address of that firm is 619 Howe Street- Unit D, Southport, NC 28641. The financial statements therein are certified by an officer of the Issuer to present fairly, in all material respects, the financial position, results of operations and cash flows for the periods presented, in conformity with accounting principles generally accepted in the United States of America, consistently applied. In the opinion of management, all adjustments considered necessary for fair presentation have been included in the financial statements.

The Issuer's transfer agent (the "Transfer Agent") is Island Stock Transfer, 15500 Roosevelt Boulevard - Suite 100, Clearwater, Florida 33760: Phone: (727) 289-0010, Fax: (727) 289-0069 the Transfer Agent is registered with the Securities and Exchange Commission. I have communicated with the Transfer Agent to confirm the number of shares outstanding.

The documents containing the information concerning the Issuer and the Securities that are publicly available as of the date of this letter of approximately, January 31, 2018 and that I have reviewed in connection with the preparation of this Opinion (the "Information") include the following:

- Initial Company Information and Disclosure Statement Pursuant to Rule 15c2-(11)(a)(5) under the Securities Exchange Act of 1934 of the Issuer dated August 30, 2010 as filed with OTC Markets, Inc. on August 31, 2010 (the "ICIDS");
- Annual Report including historical financial information for the years ended December 31, 2008 and 2009 as filed with OTC Markets, Inc. on August 30, 2010;
- Quarterly Report for the quarter ended March 31, 2010 as filed with OTC Markets, Inc. on August 3, 2010;
- Quarterly Report for the quarter ended June 30, 2010 as filed with OTC Markets, Inc. on August 30, 2010;
- Management Discussion and Analysis for the quarter ended June 30, 2010 as filed with OTC Markets, Inc. on September 21, 2010;
- Articles of Incorporation and all amendments thereto as filed with the Pink OTC Markets, Inc. on August 31, 2010;

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- Corporate Bylaws as included in the filed with ICIDS;
- 9/30/10 Quarterly Report filed November 15, 2010;
- 12/31/10 Annual Report filed February 16, 2011;
- 3/31/11 Quarterly Report filed May 16, 2011;
- 12/31/17 Annual Report filed on January 26, 2018.

I have personally reviewed the Historical Information together with all exhibits and it is my legal opinion that the Historical Information comports with all necessary requirements of Rule 144(c)(2) under Securities Act, and that to the best of my knowledge the Historical Information taken as a whole is accurate, up to date, and contains the most current information available on the Issuer, and that an interested investor would find current information therein which could help him objectively determine corporate and financially relevant information better enabling him to make an informed and educated and intelligent decision. I have met and discussed with the management and all of the directors the Historical Information, and received management's approval of this Opinion and all filings hereunder. Moreover, to the best of my knowledge, after inquiry of management and the members of the Board of Directors of the Issuer, neither the Issuer nor its Board of Directors nor any 5% or greater shareholder is currently under investigation by any Federal or state regulatory authority for any violation of federal or state securities laws. Furthermore, after reasonable inquiry, I confirm the ownership information with respect to the Issuer's officers and directors and 5% beneficial owners set forth in the Historical Information.

I am a resident of the State of New York and admitted to practice law in the State of New York. I have been retained by Issuer for the purpose of rendering this Opinion and related matters. My relationship as counsel to the Issuer is solely as a lawyer serving as securities counsel and retained solely for the purpose of reviewing the current information provided by Issuer. I have never been prohibited from practicing before the Securities and Exchange Commission. I do not own any shares in the Issuer.

The opinions set forth herein are expressed as of the date hereof and remain valid so long as the document, instruments, records and certificates I have examined and relied upon, as noted above, are unchanged and the assumptions I have made, as noted above, are valid. While this Opinion is intended exclusively for use by OTC Markets Group, the same is hereby granted full and complete rights and permission without any future request to publish this Opinion as part of "www.OTCMarkets.com" for viewing by the public and regulatory agencies.

Very truly yours,

Frank J. Hariton