

June 24, 2013
(Revising Opinion Dated June 24, 2013)

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

Re: Hokutou Holdings International, Inc. (HKTU)
Adequate Current Information

Ladies and Gentlemen:

You are entitled to rely on this letter as revised in determining whether Hokutou Holdings International, Inc. ("*Company*") has made adequate current information publicly available within the meaning of Rule 144c(2) under the Securities Act of 1933 ("*Securities Act*").

The undersigned is a resident of the United States. My office has been engaged by the Company to be its special legal counsel for the sole purpose of rendering this opinion. Services include reviewing disclosure information and communicating with Company management to provide the legal advice requested. I have examined such corporate records and other documents and have asked such questions as I have considered necessary or appropriate for the purpose of writing this letter. I have specifically reviewed (i) the Company's Quarterly Report and financial Statements for the Quarter Ended September 30, 2012 posted on January 3, 2013; (ii) the Company's Annual Report for the period ended December 31, 2012 posted on June 17, 2013; and the Company's Quarterly Information and Disclosure Statement for the period ended March 31, 2013 posted on June 17, 2013. I have relied on publicly available information from the Secretary of State of the State of Colorado and information obtained from the Company's sole officer and director. I believe the sources I have relied upon are reliable. I have assumed the authenticity and accurateness of all materials reviewed and information received.

This letter relates to the laws of the United States, specifically the Securities Act and the corporate laws of the State of Colorado. The undersigned is a member in good standing of the bar of the State of Florida since 1981, the bar of the State of New York since 1974 and the bar of the State of New Hampshire since 1990 and is permitted to

practice before the Securities and Exchange Commission ("*SEC*") and the undersigned has not been prohibited from practice thereunder.

The Company is not a reporting issuer under the Securities Exchange Act of 1934 ("*Exchange Act*") and, therefore, does not file periodic reports with the SEC. I have reviewed publicly available information relating to the Company including its Issuer Information and Disclosure Statement as posted through OTCIQ on June 17, 2013 ("*Information Statement*") and the specific information set forth in the second paragraph of this letter.

This information (i) constitutes, in my opinion, adequate current public information concerning the Company's securities and is available within the meaning of the Securities Act; (ii) 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 (iii) it complies as to form with the OTC Market Group's OTC Pink Disclosure Guidelines which are located on the Internet at www.otcm Markets.com and (iv) has been posted through the OTC Disclosure and News Service.

The person responsible for the preparation of the financial statements and reports contained in the Information Statement, Eugene Collins, has the experience and knowledge to prepare them. Mr. Collins has more than 20 years experience in businesses involving consumer product sales and marketing and is familiar with the standard requirements for financial statements and reporting. The financial statements included in the Information Statement have not been audited.

The Company's transfer agent is Madison Stock Transfer, which is registered with the SEC. The method used by Mr. Collins to confirm the number of outstanding shares of common stock set forth in the Information Statement was to contact the transfer agent and receive written confirmation as to the number of outstanding shares.

The undersigned has personally conferred with the Chief Executive Officer and the sole director of the Company. The undersigned has also reviewed the Information Statement, as presently published by the Company through the OTC Disclosure and News Service and discussed its content with the Chief Executive Officer and sole director.

To the best of my knowledge, after inquiry of management and the director of the Company, no officer, director or 5% or greater holder of the outstanding securities of the Company is currently known to be under investigation by any federal or state regulatory authority for any violation of federal or states securities laws.

No person other than OTC Markets Group, Inc. is entitled to rely on this letter. However, the undersigned hereby grants the OTC Markets Group, Inc. full and complete permission and right to publish this letter in the OTC Disclosure and News Service for viewing by the public and regulators.

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.

Eugene Collins Title: Chief Executive Officer and Chairman
Hokutou Holdings International, Inc. 939 W. North Ave. Suite 750, Chicago
Illinois 60642

Number of Shares of Common Stock Beneficially Owned: 0

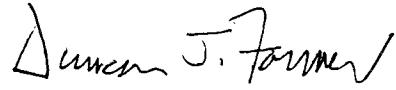
The shares were acquired as investment for cash and in lieu of compensation.

The total outstanding shares of Common Stock, as of the date of this letter, is 983,915,148.

The undersigned has made specific inquiry of each of the persons listed above, persons engaged in promotional activities regarding the Company, and persons owning more than ten percent (10%) of the Company's Common Stock (*collectively, the "Insiders"*), and based upon such inquiries and other available information, any sales of Common Stock by Insiders within the twelve-month period prior to the opinion have been made in compliance with Rule 144, including, without limitation, any required filings of Form 144, and nothing has come to the attention of counsel indicating that any of the Insiders is in possession of any material non-public information regarding the Company or the Securities that would prohibit

any of them from buying or selling the Securities under Rules 10b-5 or 10b5-1 under the Exchange Act.

Very truly yours,

A handwritten signature in black ink that reads "Duncan J. Farmer". The signature is written in a cursive style with a large, stylized "D" and a checkmark-like flourish at the end.

Duncan Farmer