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November 17, 2011

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

RE: Legal Opinion, Adequate Current Information, Continuing Disclosure Requirements for SearchPath HCS, Inc. (SRCP)

Dear Ladies and Gentlemen:

Please be advised as follows:

Pink OTC Markets Inc. ("Pink OTC Markets") is entitled to rely on this opinion in determining whether SearchPath HCS, Inc., a Nevada Corporation (the "Company"), has made adequate disclosure of current information publicly available ("Information") within the meaning of Rule 144(c)(2) under the Securities Act of 1933, as amended (the "Act").

I am a United States Citizen and resident, and a member of Day Ketterer Ltd., a law firm which has been retained by the Company as disclosure counsel. One part of our duties is to insure that regular disclosure is made to the public pursuant to the Act and its related rules and regulations. I am authorized to practice law in the States of Ohio and New York, and I am in good standing. I am permitted to practice before the Securities and Exchange Commission and have not been prohibited from practice thereunder.

In connection with rendering this opinion, we have examined such current corporate documents and other documents and questions of law as we consider necessary for the issuance of this opinion. As to matters of fact, we have relied on information obtained from public officials, officers of the Company and other sources and all such sources are believed to be reliable. In our examination, we have assumed the genuineness of all signatures on all documents, the legal capacity of all natural persons, the authenticity of all documents submitted to us as originals, the conformity to original documents of all documents submitted as copies, and the authenticity of the originals of such latter documents. Nothing has come to our attention that would question the reliability of such sources.

We have reviewed the Annual Report for the period ending June 30, 2011, filed with Pink OTC Markets on September 14, 2011, and the Quarterly Report for the period ending September 30, 2011, filed with Pink OTC Markets on November 14, 2011 (the "Filings"), and it is our opinion that the Filings are accurate, up to date and contain the most current information available on the Company.

The financials were prepared by Amy Johnston, the Company's Vice President and Chief Compliance Officer, in accordance with GAAP standards. The financials have not been audited by Skoda Minotti & Company, the Company's independent auditors, at this time. I have discussed the financials with the Company's Chief Executive Officer, Thomas K. Johnston, and with Amy Johnston, and believe them to be reliable. Both Thomas K. Johnston and Amy Johnston have experience with reporting such financial documents through their service as officers of the Company's subsidiary, SearchPath International Inc. Moreover, Skoda Minotti & Company has extensive experience with reporting such financial documents and is qualified in preparing GAAP financial statements.

Based on the above assumptions, it is our opinion that the Filing (i) constitutes "adequate current public information" concerning the securities of the issuer and is "available" within the meaning of Rule 144(c)(2) under the 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 securities under Rule 15c2-11 under the Securities Exchange Act of 1934, as amended (the "Exchange Act"), (iii) complies as to form with the Pink OTC Markets Guidelines for Providing Adequate Current Information, and (iv) has been posted through the OTC Disclosure and News Service.

I can confirm that the Company's transfer agent is Island Stock Transfer, 100 Second Avenue South, Suite 705S, St. Petersburg, Florida 33701. The transfer agent is registered with the Securities Exchange Commission. The method used to confirm the number of outstanding shares was a review of corporate files and records produced by the transfer agent.

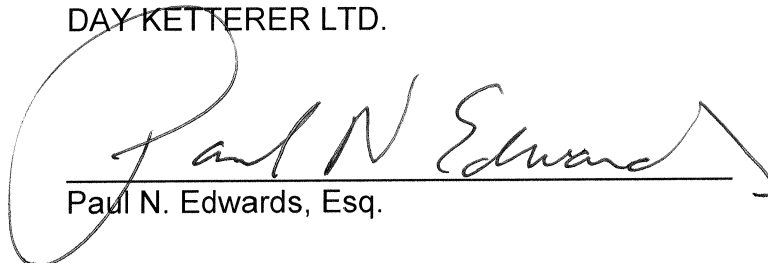
I have (i) personally met with management of the Company and its directors, (ii) reviewed the information, as amended, published by the Company through the OTC Disclosure and News Service, and (iii) discussed the information with management and the Company's directors.

To the best of my knowledge, and after discussion with all of the directors of the Company, neither the Company, any five percent (5%) shareholder of the Company, nor counsel for the Company is currently under investigation by any federal or state regulatory authority for violation of any federal or state securities laws.

No other person other than Pink OTC Markets is entitled to rely on this letter. I give Pink OTC Markets permission to publish this letter in the Pink OTC Markets News Service for viewing by the public and regulators.

Very truly yours,

DAY KETTERER LTD.

A handwritten signature in cursive script that reads "Paul N. Edwards". The signature is written in black ink and is positioned above a horizontal line. The first letter "P" is significantly larger and loops around the rest of the name.

Paul N. Edwards, Esq.