

LAW OFFICES OF THOMAS G. AMON

733 3rd Avenue, 15th Floor
New York, NY 10017

Tel: (212) 810-2430

May 5, 2017

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

Re: Global Entertainment Holdings, Inc. Annual Report Posted on March 6, 2017

Ladies and Gentlemen:

We serve as counsel for Global Entertainment Holdings, Inc. (the "Company") with respect to corporate, disclosure and other matters and have been retained by the Company for the purpose of rendering this letter to be posted on the OTC Disclosure and News Service in accordance with the guidelines set forth in our Attorney Letter Agreement (the "Agreement") with OTC Markets Group, Inc. ("OTC Markets Group"). OTC Markets Group is entitled to rely on this letter in determining whether the Company has made adequate current information publicly available within the meaning of Rule 144(c)(2) under the Securities Act of 1933.

In connection with this letter, we have reviewed the Company's Unaudited Quarterly Report (the "Report") posted on the OTC Disclosure and News Service on September 30, 2016, the Company's Unaudited Annual Report for the period ended December 31, 2016 (the "Annual Report") posted on OTC Disclosure and News Service on March 6, 2017 and such other corporate records and other documents and such questions of law as we have considered necessary or appropriate for purposes of rendering this letter.

For purposes of this letter, we have assumed (a) the genuineness of all signatures and the authenticity and completeness of all corporate records and other documents submitted to us as originals, (b) the conformity to authentic originals of all corporate records and other documents submitted to us as certified, conformed, photostatic or facsimile copies thereof, and (c) the accuracy and adequacy of the disclosures made to us by the Company and its management and board of directors, including without limitation the financial and other information contained in the Report. In the course of our representation of the Company, nothing has come to our attention that would cause us to believe that any such records or

documents are not accurate, authentic or reliable, and we provide no assurances as to the accuracy or adequacy of any such records or documents.

In our opinion, the Report (i) constitutes “adequate current public information” with respect to the Company that is “publicly available” within the meaning of Rule 144(c)(2) under the Securities Act of 1933 as a result of the Report being posted on the OTC Disclosure and News Service on April 26, 2016, (ii) includes all of the information that a broker-dealer would be required to obtain from the Company to publish a quotation for the common stock of the Company under Rule 15c2-11 under the Securities Exchange Act of 1934, and (iii) complies as to form in all material respects with the OTC Markets Group's Guidelines for Providing Adequate Current Information, which are located on the Internet at www.otcmarkets.com.

We have been advised that the Company's Chief Financial Officer Alan J. Bailey, prepared the financial statements contained in the Report and in the Annual Report. The financial statements contained in the Report and the Annual Report have not been audited. The person responsible for the preparation of the financial statements contained in the Report and the Annual Report is the Company's Chief Financial Officer, Alan J. Bailey, Principal Financial Officer, 21515 Hawthorne Blvd., Suite 204, Torrance, CA 90503, Tel: (877) 807-8880, who is qualified to prepare the financial statements. Mr. Bailey Alan is a Fellow of the Institute of UK Chartered Accountants and is an alumni of Ernst & Young and Grant Thornton.

Alan Bailey previously held a senior financial executive position with Paramount for thirty-five years from 1975 through 2009, including being its Treasurer. Mr. Bailey is a finance veteran in the entertainment industry and has substantial experience in cash management, financial reporting, audit and compliance, corporate and structured finance, and financial planning, and is considered to be one of the industry's leading experts in maximizing both domestic and international film production incentives.

We have been advised that the Company's transfer agent is Colonial Stock Transfer Company, whose address is 66 Exchange Plaza, Suite 100, Salt Lake City, UT 84111. Based on information made available to the public by the Securities and Exchange Commission, Colonial Stock Transfer Company is registered with the Securities and Exchange Commission pursuant to Section 17A of the Securities Exchange Act of 1934. The Company has confirmed to us that a stockholder list dated February 7, 2017, which was provided by Colonial Stock Transfer Company to the Company, was used by the Company to confirm the number of issued and outstanding shares set forth in the Report.

The members of our firm providing services to the Company are U.S. residents. A member

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of our firm has personally met with representatives of management and with a majority of the members of the board of directors of the Company, reviewed the Report, and discussed the Report with representatives of management and a majority of the members of the board of directors of the Company.

The members of our firm providing services to the Company are licensed to practice law only in the State of New York, and this letter applies only insofar as the existing law of the State of New York, the general corporate laws of the State of Delaware and federal law are applicable. We express no opinion with respect to any other laws. The members of our firm providing services to the Company are permitted to practice before the Securities and Exchange Commission and have not been prohibited from practicing before the Securities and Exchange Commission.

To the best of our knowledge, after inquiry of management and members of the board of directors of the Company, neither the Company nor any 5% holder of the Company's common stock, or any member of our firm providing services to the Company, is currently under investigation by any federal or state regulatory authority for any violation of federal or state securities laws.

This letter is limited to the matters set forth, and no opinion may be inferred or implied beyond the matters expressly contained herein. This letter is rendered solely to OTC Markets Group in connection with the Agreement, and may not be relied upon by any other person or for any other purpose without our prior written consent. OTC Markets Group has full and complete permission and rights to publish this letter through the OTC Disclosure and New Service for viewing by the public and regulators.

Sincerely,

A handwritten signature in black ink, appearing to read "Thomas G. Amon", written in a cursive style.

Law Offices of Thomas G. Amon

cc: Global Entertainment Holdings, Inc.