























recklessly have (i) employed one or more devices, schemes, or artifices to defraud, (ii) made one or more untrue statements of a material fact or omitted to state one or more material facts necessary in order to make the statements made, in light of the circumstances under which they were made, not misleading, and/or (iii) engaged in one or more acts, practices, or courses of business which operated or would operate as a fraud or deceit upon other persons.

35. By reason of the foregoing, Defendants, directly or indirectly, singly or in concert, have violated and, unless enjoined, will again violate Exchange Act Section 10(b) [15 U.S.C. § 78j(b)] and Rule 10b-5 thereunder [17 C.F.R. § 240.10b-5].

### **PRAYER FOR RELIEF**

WHEREFORE, the Commission respectfully requests that the Court enter a Final Judgment:

#### **I.**

Permanently enjoining Rubin and his agents, servants, employees and attorneys and all persons in active concert or participation with any of them from violating, directly or indirectly, Securities Act Section 17(a) [15 U.S.C. § 77q(a)] and Exchange Act Section 10(b) [15 U.S.C. § 78j(b)] and Rule 10b-5(b) thereunder [17 C.F.R. §§ 240.10b-5(b)];

#### **II.**

Permanently enjoining Craft and his agents, servants, employees and attorneys and all persons in active concert or participation with any of them from violating, directly or indirectly, Securities Act Section 17(a) [15 U.S.C. § 77q(a)] and Exchange Act Section 10(b) [15 U.S.C. § 78j(b)] and Rule 10b-5(b) thereunder [17 C.F.R. §§ 240.10b-5(b)];

**III.**

Ordering Rubin to pay civil monetary penalties under Securities Act Section 20(d) [15 U.S.C. § 77t(d)] and Exchange Act Section 21(d)(3) [15 U.S.C. § 78u(d)(3)];

**IV.**

Ordering Craft to pay civil monetary penalties under Securities Act Section 20(d) [15 U.S.C. § 77t(d)] and Exchange Act Section 21(d)(3) [15 U.S.C. § 78u(d)(3)];

**V.**

Permanently prohibiting Rubin from participating in any offering of a penny stock, including engaging in activities with a broker, dealer, or issuer for purposes of issuing, trading, or inducing or attempting to induce the purchase or sale of any penny stock, under Exchange Act Section 21(d)(6) [15 U.S.C. § 78u(d)(6)];

**VI.**

Permanently prohibiting Craft from participating in any offering of a penny stock, including engaging in activities with a broker, dealer, or issuer for purposes of issuing, trading, or inducing or attempting to induce the purchase or sale of any penny stock, under Exchange Act Section 21(d)(6) [15 U.S.C. § 78u(d)(6)]; and

**VII.**

Granting any other and further relief this Court may deem just and proper.

Dated: New York, New York  
December 2, 2020

/s/Richard Best

RICHARD BEST  
REGIONAL DIRECTOR  
Lara S. Mehraban  
Michael Paley  
Dugan Bliss  
Hane L. Kim  
Attorneys for Plaintiff  
SECURITIES AND EXCHANGE COMMISSION  
New York Regional Office  
Brookfield Place  
200 Vesey Street, Suite 400  
New York, New York 10281-1022  
212-336-0971 (Bliss)  
blissd@sec.gov

**Appendix A**  
**Attorney Opinion Letters Signed by Richard J. Rubin**

Issuer	Date	Letter Title	Recipient	Signatory	Misrepresentations
Issuer 4	8/5/2016	Adequate Current Information	OTC Markets Group, Inc.	Richard J. Rubin	"Office of Richard Rubin, Attorney at Law" letterhead and signature "Richard Rubin, Esq."  "My firm has been retained as special securities counsel to [Issuer]."  "This Attorney Letter relates to the laws of the United States, including the Securities Act of 1933 and the corporate laws of the jurisdiction of incorporation. The undersigned is a resident of the United States, and a member in good standing of the bar of the State of New York."
Issuer 5	10/18/2016	Restrictive Legend Removal	Transfer Agent	Richard J. Rubin	"Office of Richard Rubin, Attorney at Law" letterhead and signature "Richard Rubin, Esq."  "I have been asked to render my opinion as special counsel to [Issuer] . . . ."
Issuer 2	12/19/2016	Restrictive Legend Removal	Transfer Agent	Richard J. Rubin	"Office of Richard Rubin, Attorney at Law" letterhead, signature "Richard Rubin, Esq."
Issuer 5	1/3/2017	Restrictive Legend Removal	Transfer Agent	Richard J. Rubin	signature "Richard Rubin, Esq."  "I have been asked to render my opinion as special counsel to [the Issuer] . . . ."
Issuer 5	1/13/2017	Restrictive Legend Removal	Transfer Agent	Richard J. Rubin	"Office of Richard Rubin, Attorney at Law" letterhead, signature "Richard Rubin, Esq."  "As counsel to [Issuer], my opinion has been requested . . . ."
Issuer 5	1/24/2017	Restrictive Legend Removal	Transfer Agent	Richard J. Rubin	"Office of Richard Rubin, Attorney at Law" letterhead, signature "Richard Rubin, Esq."  "As counsel to [Issuer], my opinion has been requested . . . ."
Issuer 6	1/24/2017	Restrictive Legend Removal	Transfer Agent	Richard J. Rubin	"Office of Richard Rubin, Attorney at Law" letterhead, signature "Richard Rubin, Esq."  "As counsel to [Issuer], my opinion has been requested . . . ."
Issuer 6	1/30/2017	Restrictive Legend Removal	Transfer Agent	Richard J. Rubin	"Office of Richard Rubin, Attorney at Law" letterhead, signature "Richard Rubin, Esq."  "As counsel to [Issuer], my opinion has been requested . . . ."
Issuer 5	2/9/2017	Restrictive Legend Removal	Transfer Agent	Richard J. Rubin	"Office of Richard Rubin, Attorney at Law" letterhead, signature "Richard Rubin, Esq."  "As counsel to [Issuer], my opinion has been requested . . . ."
Issuer 5	2/23/2017	Restrictive Legend Removal	Transfer Agent	Richard J. Rubin	"Office of Richard Rubin, Attorney at Law" letterhead, signature "Richard Rubin, Esq."  "As counsel to [Issuer], my opinion has been requested . . . ."
Issuer 5	2/23/2017	Restrictive Legend Removal	Transfer Agent	Richard J. Rubin	"Office of Richard Rubin, Attorney at Law" letterhead, signature "Richard Rubin, Esq."  "As counsel to [Issuer], my opinion has been requested . . . ."

Issuer	Date	Letter Title	Recipient	Signatory	Misrepresentations
Issuer 5	2/23/2017	Restrictive Legend Removal	Transfer Agent	Richard J. Rubin	"Office of Richard Rubin, Attorney at Law" letterhead, signature "Richard Rubin, Esq."  "As counsel to [Issuer], my opinion has been requested . . . ."
Issuer 5	2/23/2017	Restrictive Legend Removal	Transfer Agent	Richard J. Rubin	"Office of Richard Rubin, Attorney at Law" letterhead, signature "Richard Rubin, Esq."  "As counsel to [Issuer], my opinion has been requested . . . ."
Issuer 5	2/23/2017	Restrictive Legend Removal	Transfer Agent	Richard J. Rubin	"Office of Richard Rubin, Attorney at Law" letterhead, signature "Richard Rubin, Esq."  "As counsel to [Issuer], my opinion has been requested . . . ."
Issuer 5	2/23/2017	Restrictive Legend Removal	Transfer Agent	Richard J. Rubin	"Office of Richard Rubin, Attorney at Law" letterhead, signature "Richard Rubin, Esq."  "As counsel to [Issuer], my opinion has been requested . . . ."
Issuer 5	3/6/2017	Restrictive Legend Removal	Transfer Agent	Richard J. Rubin	"Office of Richard Rubin, Attorney at Law" letterhead, signature "Richard Rubin, Esq."  "As counsel to [Issuer], my opinion has been requested . . . ."
Issuer 5	3/6/2017	Restrictive Legend Removal	Transfer Agent	Richard J. Rubin	"Office of Richard Rubin, Attorney at Law" letterhead, signature "Richard Rubin, Esq."  "As counsel to [Issuer], my opinion has been requested . . . ."
Issuer 5	3/6/2017	Restrictive Legend Removal	Transfer Agent	Richard J. Rubin	"Office of Richard Rubin, Attorney at Law" letterhead, signature "Richard Rubin, Esq."  "As counsel to [Issuer], my opinion has been requested . . . ."
Issuer 5	3/6/2017	Restrictive Legend Removal	Transfer Agent	Richard J. Rubin	"Office of Richard Rubin, Attorney at Law" letterhead, signature "Richard Rubin, Esq."  "As counsel to [Issuer], my opinion has been requested . . . ."
Issuer 5	3/6/2017	Restrictive Legend Removal	Transfer Agent	Richard J. Rubin	"Office of Richard Rubin, Attorney at Law" letterhead, signature "Richard Rubin, Esq."  "As counsel to [Issuer], my opinion has been requested . . . ."
Issuer 5	3/6/2017	Restrictive Legend Removal	Transfer Agent	Richard J. Rubin	"Office of Richard Rubin, Attorney at Law" letterhead, signature "Richard Rubin, Esq."  "As counsel to [Issuer], my opinion has been requested . . . ."
Issuer 5	3/6/2017	Restrictive Legend Removal	Transfer Agent	Richard J. Rubin	"Office of Richard Rubin, Attorney at Law" letterhead, signature "Richard Rubin, Esq."  "As counsel to [Issuer], my opinion has been requested . . . ."
Issuer 5	3/6/2017	Restrictive Legend Removal	Transfer Agent	Richard J. Rubin	"Office of Richard Rubin, Attorney at Law" letterhead, signature "Richard Rubin, Esq."  "As counsel to [Issuer], my opinion has been requested . . . ."
Issuer 5	3/6/2017	Restrictive Legend Removal	Transfer Agent	Richard J. Rubin	"Office of Richard Rubin, Attorney at Law" letterhead, signature "Richard Rubin, Esq."  "As counsel to [Issuer], my opinion has been requested . . . ."
Issuer 5	3/6/2017	Restrictive Legend Removal	Transfer Agent	Richard J. Rubin	"Office of Richard Rubin, Attorney at Law" letterhead, signature "Richard Rubin, Esq."  "As counsel to [Issuer], my opinion has been requested . . . ."

Issuer	Date	Letter Title	Recipient	Signatory	Misrepresentations
Issuer 5	3/7/2017	Restrictive Legend Removal	Transfer Agent	Richard J. Rubin	"Office of Richard Rubin, Attorney at Law" letterhead, signature "Richard Rubin, Esq."  "As counsel to [Issuer], my opinion has been requested . . . ."
Issuer 5	3/9/2017	Restrictive Legend Removal	Transfer Agent	Richard J. Rubin	"Office of Richard Rubin, Attorney at Law" letterhead, signature "Richard Rubin, Esq."  "As counsel to [Issuer], my opinion has been requested . . . ."
Issuer 5	3/14/2017	Restrictive Legend Removal	Transfer Agent	Richard J. Rubin	"Office of Richard Rubin, Attorney at Law" letterhead, signature "Richard Rubin, Esq."  "As counsel to [Issuer], my opinion has been requested . . . ."
Issuer 5	3/14/2017	Restrictive Legend Removal	Transfer Agent	Richard J. Rubin	"Office of Richard Rubin, Attorney at Law" letterhead, signature "Richard Rubin, Esq."  "As counsel to [Issuer], my opinion has been requested . . . ."
Issuer 5	3/14/2017	Restrictive Legend Removal	Transfer Agent	Richard J. Rubin	"Office of Richard Rubin, Attorney at Law" letterhead, signature "Richard Rubin, Esq."  "As counsel to [Issuer], my opinion has been requested . . . ."
Issuer 5	3/16/2017	Restrictive Legend Removal	Transfer Agent	Richard J. Rubin	"Office of Richard Rubin, Attorney at Law" letterhead, signature "Richard Rubin, Esq."  "As counsel to [Issuer], my opinion has been requested . . . ."
Issuer 3	3/26/2017	Restrictive Legend Removal	Transfer Agent	Richard J. Rubin	"Office of Richard Rubin, Attorney at Law" letterhead, signature "Richard Rubin, Esq."  "As counsel to [Issuer], my opinion has been requested . . . ."
Issuer 5	3/28/2017	Restrictive Legend Removal	Transfer Agent	Richard J. Rubin	"Office of Richard Rubin, Attorney at Law" letterhead, signature "Richard Rubin, Esq."  "As counsel to [Issuer], my opinion has been requested . . . ."
Issuer 3	5/8/2017	Restrictive Legend Removal	Transfer Agent	Richard J. Rubin	"Office of Richard Rubin, Attorney at Law" letterhead, signature "Richard Rubin, Esq."  "As counsel to [Issuer], my opinion has been requested . . . ."
Issuer 5	5/11/2017	Restrictive Legend Removal	Transfer Agent	Richard J. Rubin	"Office of Richard Rubin, Attorney at Law" letterhead, signature "Richard Rubin, Esq."  "As counsel to [Issuer], my opinion has been requested . . . ."
Issuer 5	5/28/2017	Restrictive Legend Removal	Transfer Agent	Richard J. Rubin	"Office of Richard Rubin, Attorney at Law" letterhead, signature "Richard Rubin, Esq."  "As counsel to [Issuer], my opinion has been requested . . . ."
Issuer 3	6/18/2017	Restrictive Legend Removal	Transfer Agent	Richard J. Rubin	"Office of Richard Rubin, Attorney at Law" letterhead, signature "Richard Rubin, Esq."  "As counsel to [Issuer], my opinion has been requested . . . ."
Issuer 5	6/23/2017	Restrictive Legend Removal	Transfer Agent	Richard J. Rubin	"Office of Richard Rubin, Attorney at Law" letterhead, signature "Richard Rubin, Esq."  "As counsel to [Issuer], my opinion has been requested . . . ."



Issuer	Date	Letter Title	Recipient	Signatory	Misrepresentations
Issuer 5	6/26/2017	Restrictive Legend Removal	Transfer Agent	Richard J. Rubin	"Office of Richard Rubin, Attorney at Law" letterhead, signature "Richard Rubin, Esq."  "As counsel to [Issuer], my opinion has been requested . . . ."
Issuer 6	6/30/2017	Restrictive Legend Removal	Transfer Agent	Richard J. Rubin	"Office of Richard Rubin, Attorney at Law" letterhead, signature "Richard Rubin, Esq."  "As counsel to [Issuer], I rendered a legal opinion addressed to [Transfer Agent], dated June 26, 2017, with respect to the removal of a legend on 1,500,000 restricted Shares of the Issuer's common stock . . . ."
Issuer 5	7/5/2017	Restrictive Legend Removal	Transfer Agent	Richard J. Rubin	"Office of Richard Rubin, Attorney at Law" letterhead, signature "Richard Rubin, Esq."  "As counsel to [Issuer], my opinion has been requested . . . ."
Issuer 5	7/9/2017	Restrictive Legend Removal	Transfer Agent	Richard J. Rubin	"Office of Richard Rubin, Attorney at Law" letterhead, signature "Richard Rubin, Esq."  "As counsel to [Issuer], my opinion has been requested . . . ."
Issuer 5	7/12/2017	Restrictive Legend Removal	Transfer Agent	Richard J. Rubin	"Office of Richard Rubin, Attorney at Law" letterhead, signature "Richard Rubin, Esq."  "As counsel to [Issuer], my opinion has been requested . . . ."
Issuer 5	7/17/2017	Restrictive Legend Removal	Transfer Agent	Richard J. Rubin	"Office of Richard Rubin, Attorney at Law" letterhead, signature "Richard Rubin, Esq."  "As counsel to [Issuer], my opinion has been requested . . . ."
Issuer 5	7/17/2017	Restrictive Legend Removal	Transfer Agent	Richard J. Rubin	"Office of Richard Rubin, Attorney at Law" letterhead, signature "Richard Rubin, Esq."  "As counsel to [Issuer], my opinion has been requested . . . ."
Issuer 5	7/20/2017	Restrictive Legend Removal	Transfer Agent	Richard J. Rubin	"Office of Richard Rubin, Attorney at Law" letterhead, signature "Richard Rubin, Esq."  "As counsel to [Issuer], my opinion has been requested . . . ."
Issuer 6	7/24/2017	Restrictive Legend Removal	Transfer Agent	Richard J. Rubin	"Office of Richard Rubin, Attorney at Law" letterhead, signature "Richard Rubin, Esq."  "As counsel to [Issuer], my opinion has been requested . . . ."
Issuer 5	7/31/2017	Restrictive Legend Removal	Transfer Agent	Richard J. Rubin	"Office of Richard Rubin, Attorney at Law" letterhead, signature "Richard Rubin, Esq."  "As counsel to [Issuer], my opinion has been requested . . . ."
Issuer 5	8/1/2017	Restrictive Legend Removal	Transfer Agent	Richard J. Rubin	"Office of Richard Rubin, Attorney at Law" letterhead, signature "Richard Rubin, Esq."  "As counsel to [Issuer], my opinion has been requested . . . ."
Issuer 5	8/7/2017	Restrictive Legend Removal	Transfer Agent	Richard J. Rubin	"Office of Richard Rubin, Attorney at Law" letterhead, signature "Richard Rubin, Esq."  "As counsel to [Issuer], my opinion has been requested . . . ."

Issuer	Date	Letter Title	Recipient	Signatory	Misrepresentations
Issuer 5	8/9/2017	Restrictive Legend Removal	Transfer Agent	Richard J. Rubin	"Office of Richard Rubin, Attorney at Law" letterhead, signature "Richard Rubin, Esq."  "As counsel to [Issuer], my opinion has been requested . . . ."
Issuer 6	8/17/2017	Restrictive Legend Removal	Transfer Agent	Richard J. Rubin	"Office of Richard Rubin, Attorney at Law" letterhead, signature "Richard Rubin, Esq."  "As counsel to [Issuer], my opinion has been requested . . . ."
Issuer 5	8/21/2017	Restrictive Legend Removal	Transfer Agent	Richard J. Rubin	"Office of Richard Rubin, Attorney at Law" letterhead, signature "Richard Rubin, Esq."  "As counsel to [Issuer], my opinion has been requested . . . ."
Issuer 5	8/21/2017	Restrictive Legend Removal	Transfer Agent	Richard J. Rubin	"Office of Richard Rubin, Attorney at Law" letterhead, signature "Richard Rubin, Esq."  "As counsel to [Issuer], my opinion has been requested . . . ."
Issuer 5	8/22/2017	Restrictive Legend Removal	Transfer Agent	Richard J. Rubin	"Office of Richard Rubin, Attorney at Law" letterhead, signature "Richard Rubin, Esq."  "As counsel to [Issuer], my opinion has been requested . . . ."
Issuer 5	8/31/2017	Restrictive Legend Removal	Transfer Agent	Richard J. Rubin	"Office of Richard Rubin, Attorney at Law" letterhead, signature "Richard Rubin, Esq."  "As counsel to [Issuer], my opinion has been requested . . . ."
Issuer 5	9/1/2017	Restrictive Legend Removal	Transfer Agent	Richard J. Rubin	"Office of Richard Rubin, Attorney at Law" letterhead, signature "Richard Rubin, Esq."  "As counsel to [Issuer], my opinion has been requested . . . ."
Issuer 5	9/1/2017	Restrictive Legend Removal	Transfer Agent	Richard J. Rubin	"Office of Richard Rubin, Attorney at Law" letterhead, signature "Richard Rubin, Esq."  "As counsel to [Issuer], my opinion has been requested . . . ."
Issuer 5	9/6/2017	Restrictive Legend Removal	Transfer Agent	Richard J. Rubin	"Office of Richard Rubin, Attorney at Law" letterhead, signature "Richard Rubin, Esq."  "As counsel to [Issuer], my opinion has been requested . . . ."
Issuer 5	9/6/2017	Restrictive Legend Removal	Transfer Agent	Richard J. Rubin	"Office of Richard Rubin, Attorney at Law" letterhead, signature "Richard Rubin, Esq."  "As counsel to [Issuer], my opinion has been requested . . . ."
Issuer 5	9/9/2017	Restrictive Legend Removal	Transfer Agent	Richard J. Rubin	"Office of Richard Rubin, Attorney at Law" letterhead, signature "Richard Rubin, Esq."  "As counsel to [Issuer], my opinion has been requested . . . ."
Issuer 3	9/25/2017	Restrictive Legend Removal	Transfer Agent	Richard J. Rubin	"Office of Richard Rubin, Attorney at Law" letterhead, signature "Richard Rubin, Esq."  "As counsel to [Issuer], my opinion has been requested . . . ."
Issuer 5	10/5/2017	Restrictive Legend Removal	Transfer Agent	Richard J. Rubin	"Office of Richard Rubin, Attorney at Law" letterhead, signature "Richard Rubin, Esq."  "As counsel to [Issuer], my opinion has been requested . . . ."

Issuer	Date	Letter Title	Recipient	Signatory	Misrepresentations
Issuer 3	10/6/2017	Restrictive Legend Removal	Transfer Agent	Richard J. Rubin	"Office of Richard Rubin, Attorney at Law" letterhead, signature "Richard Rubin, Esq."  "As counsel to [Issuer], my opinion has been requested . . . ."
Issuer 3	10/12/2017	Restrictive Legend Removal	Transfer Agent	Richard J. Rubin	"Office of Richard Rubin, Attorney at Law" letterhead, signature "Richard Rubin, Esq."  "As counsel to [Issuer], my opinion has been requested . . . ."
Issuer 6	10/14/2017	Restrictive Legend Removal	Transfer Agent	Richard J. Rubin	"Office of Richard Rubin, Attorney at Law" letterhead, signature "Richard Rubin, Esq."  "As counsel to [Issuer], my opinion has been requested . . . ."
Issuer 3	10/15/2017	Restrictive Legend Removal	Transfer Agent	Richard J. Rubin	"Office of Richard Rubin, Attorney at Law" letterhead, signature "Richard Rubin, Esq."  "As counsel to [Issuer], my opinion has been requested . . . ."
Issuer 3	10/15/2017	Restrictive Legend Removal	Transfer Agent	Richard J. Rubin	"Office of Richard Rubin, Attorney at Law" letterhead, signature "Richard Rubin, Esq."  "As counsel to [Issuer], my opinion has been requested . . . ."
Issuer 3	10/18/2017	Restrictive Legend Removal	Transfer Agent	Richard J. Rubin	"Office of Richard Rubin, Attorney at Law" letterhead, signature "Richard Rubin, Esq."  "As counsel to [Issuer], my opinion has been requested . . . ."
Issuer 5	10/19/2017	Restrictive Legend Removal	Transfer Agent	Richard J. Rubin	"Office of Richard Rubin, Attorney at Law" letterhead, signature "Richard Rubin, Esq."  "As counsel to [Issuer], my opinion has been requested . . . ."
Issuer 5	10/19/2017	Restrictive Legend Removal	Transfer Agent	Richard J. Rubin	"Office of Richard Rubin, Attorney at Law" letterhead, signature "Richard Rubin, Esq."  "As counsel to [Issuer], my opinion has been requested . . . ."
Issuer 6	10/26/2017	Restrictive Legend Removal	Transfer Agent	Richard J. Rubin	"Office of Richard Rubin, Attorney at Law" letterhead, signature "Richard Rubin, Esq."  "As counsel to [Issuer], my opinion has been requested . . . ."
Issuer 5	11/2/2017	Restrictive Legend Removal	Transfer Agent	Richard J. Rubin	"Office of Richard Rubin, Attorney at Law" letterhead, signature "Richard Rubin, Esq."  "As counsel to [Issuer], my opinion has been requested . . . ."
Issuer 6	11/3/2017	Restrictive Legend Removal	Transfer Agent	Richard J. Rubin	"Office of Richard Rubin, Attorney at Law" letterhead, signature "Richard Rubin, Esq."  "As counsel to [Issuer], my opinion has been requested . . . ."
Issuer 6	11/15/2017	Restrictive Legend Removal	Transfer Agent	Richard J. Rubin	"Office of Richard Rubin, Attorney at Law" letterhead, signature "Richard Rubin, Esq."  "As counsel to [Issuer], my opinion has been requested . . . ."
Issuer 3	11/22/2017	Restrictive Legend Removal	Transfer Agent	Richard J. Rubin	"Office of Richard Rubin, Attorney at Law" letterhead, signature "Richard Rubin, Esq."  "As counsel to [Issuer], my opinion has been requested . . . ."

Issuer	Date	Letter Title	Recipient	Signatory	Misrepresentations
Issuer 3	11/28/2017	Restrictive Legend Removal	Transfer Agent	Richard J. Rubin	"Office of Richard Rubin, Attorney at Law" letterhead, signature "Richard Rubin, Esq."  "As counsel to [Issuer], my opinion has been requested . . . ."
Issuer 3	12/11/2017	Restrictive Legend Removal	Transfer Agent	Richard J. Rubin	"Office of Richard Rubin, Attorney at Law" letterhead, signature "Richard Rubin, Esq."  "As counsel to [Issuer], my opinion has been requested . . . ."
Issuer 5	12/12/2017	Restrictive Legend Removal	Transfer Agent	Richard J. Rubin	"Office of Richard Rubin, Attorney at Law" letterhead, signature "Richard Rubin, Esq."  "As counsel to [Issuer], my opinion has been requested . . . ."
Issuer 6	12/12/2017	Restrictive Legend Removal	Transfer Agent	Richard J. Rubin	"Office of Richard Rubin, Attorney at Law" letterhead, signature "Richard Rubin, Esq."  "As counsel to [Issuer], my opinion has been requested . . . ."
Issuer 3	12/16/2017	Restrictive Legend Removal	Transfer Agent	Richard J. Rubin	"Office of Richard Rubin, Attorney at Law" letterhead, signature "Richard Rubin, Esq."  "As counsel to [Issuer], my opinion has been requested . . . ."
Issuer 3	12/18/2017	Restrictive Legend Removal	Transfer Agent	Richard J. Rubin	"Office of Richard Rubin, Attorney at Law" letterhead, signature "Richard Rubin, Esq."  "As counsel to [Issuer], my opinion has been requested . . . ."
Issuer 3	12/18/2017	Restrictive Legend Removal	Transfer Agent	Richard J. Rubin	"Office of Richard Rubin, Attorney at Law" letterhead, signature "Richard Rubin, Esq."  "As counsel to [Issuer], my opinion has been requested . . . ."
Issuer 5	12/21/2017	Restrictive Legend Removal	Transfer Agent	Richard J. Rubin	"Office of Richard Rubin, Attorney at Law" letterhead, signature "Richard Rubin, Esq."  "As counsel to [Issuer], my opinion has been requested . . . ."
Issuer 3	12/21/2017	Restrictive Legend Removal	Transfer Agent	Richard J. Rubin	"Office of Richard Rubin, Attorney at Law" letterhead, signature "Richard Rubin, Esq."  "As counsel to [Issuer], my opinion has been requested . . . ."
Issuer 6	1/10/2018	Restrictive Legend Removal	Transfer Agent	Richard J. Rubin	"Office of Richard Rubin, Attorney at Law" letterhead, signature "Richard Rubin, Esq."  "As counsel to [Issuer], my opinion has been requested . . . ."
Issuer 6	1/11/2018	Restrictive Legend Removal	Transfer Agent	Richard J. Rubin	"Office of Richard Rubin, Attorney at Law" letterhead, signature "Richard Rubin, Esq."  "As counsel to [Issuer], my opinion has been requested . . . ."
Issuer 2	1/22/2018	Restrictive Legend Removal	Transfer Agent	Richard J. Rubin	"Office of Richard Rubin, Attorney at Law" letterhead, signature "Richard Rubin, Esq."  "As counsel to [Issuer], my opinion has been requested . . . ."
Issuer 2	1/22/2018	Restrictive Legend Removal	Transfer Agent	Richard J. Rubin	"Office of Richard Rubin, Attorney at Law" letterhead, signature "Richard Rubin, Esq."  "As counsel to [Issuer], my opinion has been requested . . . ."
Issuer 2	1/22/2018	Restrictive Legend Removal	Transfer Agent	Richard J. Rubin	"Office of Richard Rubin, Attorney at Law" letterhead, signature "Richard Rubin, Esq."  "As counsel to [Issuer], my opinion has been requested . . . ."

Issuer	Date	Letter Title	Recipient	Signatory	Misrepresentations
Issuer 2	1/22/2018	Restrictive Legend Removal	Transfer Agent	Richard J. Rubin	"Office of Richard Rubin, Attorney at Law" letterhead, signature "Richard Rubin, Esq."  "As counsel to [Issuer], my opinion has been requested . . . ."
Issuer 2	1/22/2018	Restrictive Legend Removal	Transfer Agent	Richard J. Rubin	"Office of Richard Rubin, Attorney at Law" letterhead, signature "Richard Rubin, Esq."  "As counsel to [Issuer], my opinion has been requested . . . ."
Issuer 3	1/24/2018	Original Issuance without Legend	Transfer Agent	Richard J. Rubin	"Office of Richard Rubin, Attorney at Law" letterhead, signature "Richard Rubin, Esq."  "As counsel to [Issuer], my opinion has been requested . . . ."
Issuer 3	1/24/2018	Restrictive Legend Removal	Transfer Agent	Richard J. Rubin	"Office of Richard Rubin, Attorney at Law" letterhead, signature "Richard Rubin, Esq."  "As counsel to [Issuer], my opinion has been requested . . . ."
Issuer 5	2/1/2018	Restrictive Legend Removal	Transfer Agent	Richard J. Rubin	"Office of Richard Rubin, Attorney at Law" letterhead, signature "Richard Rubin, Esq."  "As counsel to [Issuer], my opinion has been requested . . . ."
Issuer 6	2/5/2018	Restrictive Legend Removal	Transfer Agent	Richard J. Rubin	"Office of Richard Rubin, Attorney at Law" letterhead, signature "Richard Rubin, Esq."  "As counsel to [Issuer], my opinion has been requested . . . ."
Issuer 2	2/7/2018	Restrictive Legend Removal	Transfer Agent	Richard J. Rubin	"Office of Richard Rubin, Attorney at Law" letterhead, signature "Richard Rubin, Esq."  "As counsel to [Issuer], my opinion has been requested . . . ."
Issuer 7	2/8/2018	Restrictive Legend Removal	Transfer Agent	Richard J. Rubin	"Office of Richard Rubin, Attorney at Law" letterhead, signature "Richard Rubin, Esq."  "As counsel to [Issuer], my opinion has been requested . . . ."
Issuer 6	2/18/2018	Restrictive Legend Removal	Transfer Agent	Richard J. Rubin	"Office of Richard Rubin, Attorney at Law" letterhead, signature "Richard Rubin, Esq."  "As counsel to [Issuer], my opinion has been requested . . . ."
Issuer 6	2/28/2018	Restrictive Legend Removal	Transfer Agent	Richard J. Rubin	"Office of Richard Rubin, Attorney at Law" letterhead, signature "Richard Rubin, Esq."  "As counsel to [Issuer], my opinion has been requested . . . ."

**Appendix B**  
**Attorney Opinion Letters Signed by Thomas J. Craft**

Issuer	Date	Letter Title	Recipient	Signatory	Misrepresentations
Issuer 1	12/2/2015	Exh. to Reg. Stmt on Form S-1	Issuer; Filed with the Commission	Thomas J. Craft, Jr. Esq.	<p>"In connection with this opinion, I have examined and relied upon: (a) the Registration Statement and related Prospectus; (b) the Company's Certificate of Incorporation and Bylaws, as currently in effect as of the date hereof; and (c) the originals or copies certified to my satisfaction of such records, documents, certificates, memoranda and other instruments as in my judgment are necessary or appropriate to enable me to render the opinion expressed below. I have assumed the genuineness and authenticity of all documents submitted to me as originals, and the conformity to originals of all documents submitted to me as copies and the due execution and delivery of all documents where due execution and delivery are a prerequisite to the effectiveness thereof (except I have not assumed the due execution and delivery by the Company of any such documents). As to certain factual matters, I have relied upon a certificate of an officer of the Company and have not sought independently to verify such matters."</p> <p>"On the basis of the foregoing, and in reliance thereon, I am of the opinion that the Shares subject to resale by the Selling Stockholders pursuant to the Registration Statement and the related Prospectus are validly issued, fully paid and non-assessable Shares."</p>
Issuer 2	12/2/2015	Exh. to Reg. Stmt on Form S-1/A	Issuer; Filed with the Commission	Thomas J. Craft, Jr. Esq.	<p>"For the purpose of rendering my opinion herein, I have reviewed: (i) statutes of the State of Delaware to the extent I deem relevant to the matters opined upon herein; (ii) certified copies of the Company's Certificate of Incorporation and all amendments thereto; (iii) the Company's Bylaws, as currently in effect as of the date hereof; (iv) selected proceedings of the Company's board of directors and certificates of the Company's officers; and (v) such other documents as I have deemed necessary and relevant to the matter opined upon herein."</p> <p>"I have assumed the genuineness of all signatures, the conformity to authentic original documents of the copies of all such documents submitted to me as certified, conformed and photocopied, including the quoted, extracted, excerpted and reprocessed text of such documents."</p> <p>"On the basis of the foregoing, and in reliance thereon, I am of the opinion that the Shares subject to resale by the Selling Stockholders pursuant to the Registration Statement and the related Prospectus are validly issued, fully paid and non-assessable Shares."</p>

Issuer	Date	Letter Title	Recipient	Signatory	Misrepresentations
Issuer 2	1/7/2016	Exh. to Reg. Stmt on Form S-1/A	Issuer; Filed with the Commission	Thomas J. Craft, Jr. Esq.	<p>"For the purpose of rendering my opinion herein, I have reviewed: (i) statutes of the State of Delaware to the extent I deem relevant to the matters opined upon herein; (ii) certified copies of the Company's Certificate of Incorporation and all amendments thereto; (iii) the Company's Bylaws, as currently in effect as of the date hereof; (iv) selected proceedings of the Company's board of directors and certificates of the Company's officers; and (v) such other documents as I have deemed necessary and relevant to the matter opined upon herein."</p> <p>"I have assumed the genuineness of all signatures, the conformity to authentic original documents of the copies of all such documents submitted to me as certified, conformed and photocopied, including the quoted, extracted, excerpted and reprocessed text of such documents."</p> <p>"On the basis of the foregoing, and in reliance thereon, I am of the opinion that: (i) the Shares subject to resale by the Selling Stockholders pursuant to the Registration Statement and the related Prospectus are validly issued, fully paid and non-assessable Shares; and (ii) the Shares underlying the Class B Warrants that subject to resale by the Selling Stockholders pursuant to the Registration Statement and the related Prospectus when issued, will be validly issued, fully paid and non-assessable Shares."</p>
Issuer 3	5/11/2016	Exh. to Reg. Stmt on Form S-1	Issuer; Filed with the Commission	Thomas J. Craft, Jr. Esq.	<p>"For the purpose of rendering my opinion herein, I have reviewed: (i) statutes of the State of Delaware to the extent I deem relevant to the matters opined upon herein; (ii) certified copies of the Company's Certificate of Incorporation and all amendments thereto; (iii) the Company's Bylaws, as currently in effect as of the date hereof; (iv) selected proceedings of the Company's board of directors and certificates of the Company's officers; and (v) such other documents as I have deemed necessary and relevant to the matter opined upon herein."</p> <p>"I have assumed the genuineness of all signatures, the conformity to authentic original documents of the copies of all such documents submitted to me as certified, conformed and photocopied, including the quoted, extracted, excerpted and reprocessed text of such documents."</p> <p>"On the basis of the foregoing, and in reliance thereon, I am of the opinion that the Shares subject to resale by the Selling Stockholders pursuant to the Registration Statement and the related Prospectus are validly issued, fully paid and non-assessable Shares."</p>

Issuer	Date	Letter Title	Recipient	Signatory	Misrepresentations
Issuer 2	7/27/2016	Exh. to Reg. Stmt on Form S-1	Issuer; Filed with the Commission	Thomas J. Craft, Jr. Esq.	<p>"For the purpose of rendering my opinion herein, I have reviewed: (i) statutes of the State of Delaware to the extent I deem relevant to the matters opined upon herein; (ii) certified copies of the Company's Certificate of Incorporation and all amendments thereto; (iii) the Company's Bylaws, as currently in effect as of the date hereof; (iv) selected proceedings of the Company's board of directors and certificates of the Company's officers; and (v) such other documents as I have deemed necessary and relevant to the matter opined upon herein."</p> <p>"I have assumed the genuineness of all signatures, the conformity to authentic original documents of the copies of all such documents submitted to me as certified, conformed and photocopied, including the quoted, extracted, excerpted and reprocessed text of such documents."</p> <p>"On the basis of the foregoing, and in reliance thereon, I am of the opinion that the Shares subject to resale by the Selling Shareholders pursuant to the Registration Statement and the related Prospectus are validly issued, fully paid and non-assessable Shares."</p>
Issuer 3	9/16/2016	Restrictive Legend Removal	Transfer Agent	Thomas J. Craft, Jr. Esq.	<p>"In rendering the opinion set forth herein I have examined relevant documents, have relied upon the accuracy of such documents and have assumed the authenticity of the signatures thereon and the accuracy of the representations made by the Company and the Seller . . . ."</p> <p>"Based upon the facts set forth above and in reliance upon the documents referred to above and/or provided to me by the Company, the Sellers, it is my opinion that a new certificate evidencing the 30,000 Shares may be issued, 15,000 Shares i/n/o Ivo Heiden and 15,000 Shares i/n/o Securities Compliance Corp., without restrictive legend and without compliance with the registration requirements of the Act, pursuant to Rule 144, and that the sale of the Shares by each of the Sellers is not subject to any provisions of Rule 144 other than Rule 144(c)(1)."</p>
Issuer 5	11/30/2016	Restrictive Legend Removal	Transfer Agent	Thomas J. Craft, Jr. Esq.	<p>"In rendering the opinion set forth herein, I have examined relevant documents, have relied upon the accuracy of such documents and have assumed the authenticity of the signatures thereon and the accuracy of the representations made by the Company and the Sellers . . . ."</p> <p>"Based upon the facts set forth above and in reliance upon the documents referred to above and/or provided to me by the Company and the Seller, it is my opinion that a new certificate evidencing 2,000,000 Shares may be issued in the name of Seller, without restrictive legend, in compliance with the provision of the Act and the rules and regulation of Rule 144 promulgated by the SEC under the Act."</p>



<b>Issuer</b>	<b>Date</b>	<b>Letter Title</b>	<b>Recipient</b>	<b>Signatory</b>	<b>Misrepresentations</b>
Issuer 5	11/30/2016	Restrictive Legend Removal	Transfer Agent	Thomas J. Craft, Jr. Esq.	<p>"In rendering the opinion set forth herein, I have examined relevant documents, have relied upon the accuracy of such documents and have assumed the authenticity of the signatures thereon and the accuracy of the representations made by the Company and the Sellers . . . ."</p> <p>"Based upon the facts set forth above and in reliance upon the documents referred to above and/or provided to me by the . Company and the Seller, it is my opinion that a new certificate evidencing 1,500,000 Shares may be issued in the name of Seller, without restrictive legend, in compliance with the provision of the Act and the rules and regulation of Rule 144 promulgated by the SEC under the Act."</p>
Issuer 5	12/1/2016	Restrictive Legend Removal	Transfer Agent	Thomas J. Craft, Jr. Esq.	<p>"In rendering the opinion set forth herein, I have examined relevant documents including, but not limited to, the stock certificates issued in the names of the respective Sellers during the period from June 18 to July 1, 2014 and Seller's Representation Letters signed by each Seller addressed to the undersigned, have relied upon the accuracy of such documents and have assumed the authenticity of the signatures thereon and the accuracy of the representations made by the Company and the Sellers . . . ."</p> <p>"Based upon the facts set forth above and in reliance upon the documents referred to above and/or provided to me by the Company and the Sellers, it is my opinion that a new certificate evidencing the 833,332 Shares may be issued in the names of Sellers as set forth on Appendix A hereto, without restrictive legend, in compliance with the provision of the Act and the rules and regulation of Rule 144 promulgated by the SEC under the Act."</p>
Issuer 5	12/1/2016	Restrictive Legend Removal	Transfer Agent	Thomas J. Craft, Jr. Esq.	<p>"In rendering the opinion set forth herein, I have examined relevant documents, including but not limited to the subject stock certificate and Seller's Representation Letter addressed to the undersigned, have relied upon the accuracy of such documents and have assumed the authenticity of the signatures thereon and the accuracy of the representations made by the Company and the Sellers . . . ."</p> <p>"Based upon the facts set forth above and in reliance upon the documents referred to above and/or provided to me by the Company and the Seller, it is my opinion that a new certificate evidencing 555,555 Shares may be issued in the name of Seller, without restrictive legend, in compliance with the provision of the Act and the rules and regulation of Rule 144 promulgated by the SEC under the Act."</p>

Issuer	Date	Letter Title	Recipient	Signatory	Misrepresentations
Issuer 5	12/15/2016	Restrictive Legend Removal	Transfer Agent	Thomas J. Craft, Jr. Esq.	<p>"In rendering the opinion set forth herein, I have examined relevant documents, have relied upon the accuracy of such documents and have assumed the authenticity of the signatures thereon and the accuracy of the representations made by the Company and the Sellers . . . ."</p> <p>"Based upon the facts set forth above and in reliance upon the documents referred to above and/or provided to me by the Company and the Sellers, it is my opinion that certificates evidencing 50,000 Shares may be issued in the names of both Sellers, without registration under the Securities Act of 1933, as amended (the 'Act') and without restrictive legend, in reliance upon Rule 144 promulgated by the United States Securities and Exchange Commission (the 'SEC') under the Act. "</p>
Issuer 5	1/6/2017	Restrictive Legend Removal	Transfer Agent	Thomas J. Craft, Jr. Esq.	<p>"In rendering the opinion set forth herein, I have examined relevant documents, have relied upon the accuracy of such documents and have assumed the authenticity of the signatures thereon and the accuracy of the representations made by the Company and the Sellers . . . ."</p> <p>"Based upon the facts set forth above and in reliance upon the documents referred to above and/or provided to me by the Company and the seller, it is my opinion that a new certificate evidencing 6,000,000 Shares may be issued in the name of Seller, without restrictive legend and without compliance with the registration requirements of the Act, pursuant to Rule 144, and that the sale of the Shares by the Seller is not subject to any provisions of Rule 144."</p>
Issuer 5	1/20/2017	Restrictive Legend Removal	Transfer Agent	Thomas J. Craft, Jr. Esq.	<p>"In rendering the opinion set forth herein, I have examined relevant documents, have relied upon the accuracy of such documents and have assumed the authenticity of the signatures thereon and the accuracy of the representations made by the Company and the Sellers . . . ."</p> <p>"Based upon the facts set forth above and in reliance upon the documents referred to above and/or provided to me by the Company and the Seller, it is my opinion that a new certificate evidencing 210,000 Shares may be issued in the name of Seller, without restrictive legend and without compliance with the registration requirements of the Act, pursuant to Rule 144, and that the sale of the Shares by the Seller is not subject to any provisions of Rule 144."</p>
Issuer 6	4/11/2017	Exh. to Reg. Stmt on Form S-1	Issuer; Filed with the Commission	Thomas J. Craft, Jr. Esq.	<p>"For the purpose of rendering my opinion herein, I have reviewed: (i) the revised statutes of the State of Nevada to the extent I deem relevant to the matters opined upon herein; (ii) certified copies of the Company's Articles of Incorporation and all amendments thereto; (iii) the Company's Bylaws, as currently in effect as of the date hereof; (iv) selected proceedings of the Company's board of directors and certificates of the Company's officers; and (v) such other documents as I have deemed necessary and relevant to the matter opined upon herein."</p> <p>"I have assumed the genuineness of all signatures, the conformity to authentic original documents of the copies of all such documents submitted to me as certified, conformed</p>

Issuer	Date	Letter Title	Recipient	Signatory	Misrepresentations
					<p>and photocopied, including the quoted, extracted, excerpted and reprocessed text of such documents."</p> <p>"On the basis of the foregoing, and in reliance thereon, I am of the opinion that the Shares subject to resale by the Selling Stockholders pursuant to the Registration Statement and the related Prospectus are validly issued, fully paid and non-assessable Shares."</p>
Issuer 6	5/25/2017	Exh. to Reg. Stmt on Form S-1/A	Issuer; Filed with the Commission	Thomas J. Craft, Jr. Esq.	<p>"For the purpose of rendering my opinion herein, I have reviewed: (i) the revised statutes of the State of Nevada to the extent I deem relevant to the matters opined upon herein; (ii) certified copies of the Company's Articles of Incorporation and all amendments thereto; (iii) the Company's Bylaws, as currently in effect as of the date hereof; (iv) selected proceedings of the Company's board of directors and certificates of the Company's officers; and (v) such other documents as I have deemed necessary and relevant to the matter opined upon herein."</p> <p>"I have assumed the genuineness of all signatures, the conformity to authentic original documents of the copies of all such documents submitted to me as certified, conformed and photocopied, including the quoted, extracted, excerpted and reprocessed text of such documents."</p> <p>"On the basis of the foregoing, and in reliance thereon, I am of the opinion that the Shares subject to resale by the Selling Stockholders pursuant to the Registration Statement and the related Prospectus are validly issued, fully paid and non-assessable Shares."</p>
Issuer 1	9/6/2017	Exh. to Reg. Stmt on Form S-1	Issuer; Filed with the Commission	Thomas J. Craft, Jr. Esq.	<p>"In connection with this opinion, I have examined and relied upon: (a) the Registration Statement and related Prospectus; (b) the Company's Certificate of Incorporation and Bylaws, as currently in effect as of the date hereof; and (c) the originals or copies certified to my satisfaction of such records, documents, certificates, memoranda and other instruments as in my judgment are necessary or appropriate to enable me to render the opinion expressed below. I have assumed the genuineness and authenticity of all documents submitted to me as originals, and the conformity to originals of all documents submitted to me as copies and the due execution and delivery of all documents where due execution and delivery are a prerequisite to the effectiveness thereof (except I have not assumed the due execution and delivery by the Company of any such documents). As to certain factual matters, I have relied upon a certificate of an officer of the Company and have not sought independently to verify such matters."</p> <p>"On the basis of the foregoing, and in reliance thereon, I am of the opinion that the Shares subject to Offering pursuant to the Registration Statement and the related Prospectus when</p>

Issuer	Date	Letter Title	Recipient	Signatory	Misrepresentations
					issued shall be validly issued, fully paid and non-assessable Shares."
Issuer 5	3/7/2018	Restrictive Legend Removal	Transfer Agent	Thomas J. Craft, Jr. Esq.	<p>"As new counsel to [Issuer], my opinion has been requested . . . ."</p> <p>"In rendering the opinion set forth herein, I have examined relevant documents and have relied upon the accuracy of such documents and have assumed the authenticity of the signatures thereon and the accuracy of the representations made by the Company and the Sellers . . . ."</p> <p>"Based upon the facts set forth above and in reliance upon the documents referred to above and/or provided to me by the Company and the Seller, it is my opinion that a new certificate evidencing 100,000 Shares may be issued in the name of Seller, without restrictive legend, in compliance with the provision of the Act and the rules and regulations of Rule 144 promulgated by the SEC under the Act."</p>
Issuer 2	3/8/2018	Original Issuance without Legend	Transfer Agent	Thomas J. Craft, Jr. Esq.	<p>"In rendering the opinion set forth herein, I have examined relevant documents, have relied upon the accuracy of such documents and have assumed the authenticity of the signatures thereon and the accuracy of the representations made by the Company and the Seller . . . ."</p> <p>"Based upon the facts set forth and in reliance upon the documents referred to above and/or provided to me by the Company and the Issuee, it is my opinion that a new certificate evidence the 1,000,000 Shares may be issued in the name of the Issuee, without restrictive legend, in compliance with the provision of the Act and the Rules and regulation of Rule 144 promulgated by the SEC under the Act."</p>
Issuer 2	3/19/2018	Restrictive Legend Removal	Transfer Agent	Thomas J. Craft, Jr. Esq.	<p>"In rendering the opinion set forth herein, I have examined relevant documents, have relied upon the accuracy of such documents and have assumed the authenticity of the signatures thereon and the accuracy of the representations made by the Company and the Seller . . . ."</p> <p>"Based upon the facts set forth above and in reliance upon the documents referred to above and/or provided to me by the Company and the Seller, it is my opinion that a new certificate evidencing 921,800 Shares may be issued in the name of the Seller, without restrictive legend, in compliance with the provision of the Act and the rules and regulation of Rule 144 promulgated by the SEC under the Act."</p>
Issuer 6	4/6/2018	Restrictive Legend Removal	Transfer Agent	Thomas J. Craft, Jr. Esq.	<p>"In rendering the opinion set forth herein, I have examined relevant documents, have relied upon the accuracy of such documents and have assumed the authenticity of the signatures thereon and the accuracy of the representations made by the Company and the Seller . . . ."</p> <p>"Based upon the facts set forth above and in reliance upon the documents referred to above and/or provided to me by the Company and the Seller, it is my opinion that the Seller may sell the 2,000,000 restricted Shares in compliance with the provisions of Rule 144 promulgated by the SEC under the Act."</p>

Issuer	Date	Letter Title	Recipient	Signatory	Misrepresentations
Issuer 3	4/23/2018	Original Issuance without Legend	Transfer Agent	Thomas J. Craft, Jr. Esq.	<p>"In rendering the opinion set forth herein, I have examined relevant documents, have relied upon the accuracy of such documents and have assumed the authenticity of the signatures thereon and the accuracy of the representations made by the Company and the Seller . . . ."</p> <p>"Based upon the facts set forth above and in reliance upon the documents referred to above and/or provided to me by the Company and the Consultant, it is my opinion that a new certificate evidencing 550,000 Shares may be issued in the name of the Consultant and its designee(s) without restrictive legend, in compliance with the provision of the Act and the rules and regulation of Rule 144 promulgated by the SEC under the Act."</p>
Issuer 2	4/26/2018	Restrictive Legend Removal	Transfer Agent	Thomas J. Craft, Jr. Esq.	<p>"In rendering the opinion set forth herein, I have examined relevant documents and have relied upon the accuracy of such documents and have assumed the authenticity of the signatures thereon and the accuracy of the representations made by the Company and the Sellers . . . ."</p> <p>"Based upon the facts set forth above and in reliance upon the documents referred to above and/or provided to me by the Company and the Sellers, it is my opinion that a new certificates evidencing 1,259,897 Shares may be issued in book entry form in the names of Sellers, without restrictive legend, in compliance with the provision of the Act and the rules and regulations of Rule 144 promulgated by the SEC under the Act."</p>
Issuer 8	4/26/2018	Adequate Current Information	OTC Markets Group, Inc.	Thomas J. Craft, Jr. Esq.	<p>"In rendering the legal opinion contained in this letter, we have reviewed certain documents and information furnished by the Issuer but not limited to the Issuers Articles of Incorporation, Bylaws, Corporate Board Resolutions and such other documents we deemed relevant and necessary as a basis for the opinion hereinafter set forth."</p> <p>"Regarding the common stock of the Issuer in the opinion of the undersigned Regarding the common stock of the Issuer, in the opinion of the undersigned, the Report for the period ended December 31, 2017, submitted to OTC Markets on April 14, 2018 (i) constitutes "adequate content public information" concerning the Securities of the Issuer and "is available" within the meaning of Rule 144(c)(2) under the Securities Act of 1933, (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 (the "Exchange Act"), (iii) complies as to form with the Pink Sheets Guidelines for Providing Adequate Current Public Information, which are located on the Internet at www.otcmarkets.com, and (iv) has been posted in the OTC Disclosure and News Service. Furthermore, after reasonable investigation I have no reason to believe that such information contained an untrue statement of a material fact or omitted to state a material fact in order to make the statements made, in light of the circumstances under which they were made, not misleading "</p>

Issuer	Date	Letter Title	Recipient	Signatory	Misrepresentations
					<p>"The undersigned has (i) previously met with the Issuer's management and a majority of its directors, (ii) reviewed the information published by the Issuer on the OTC Disclosure and News Service, and (iii) discussed the information with management and a majority of the directors of the Issuer. To the best of our knowledge, and after reasonable inquiry of the Issuer's management and directors, there is no officer, director, 5% holder, or counsel currently under investigation by any federal or state regulatory authority for any violation of federal or state securities laws. "</p>
Issuer 3	5/7/2018	Exh. to Reg. Stmt on Form S-1	Issuer; Filed with the Commission	Thomas J. Craft, Jr. Esq.	<p>"For the purpose of rendering my opinion herein, I have reviewed: (i) the revised statutes of the State of Delaware to the extent I deem relevant to the matters opined upon herein; (ii) certified copies of the Company's Certificate of Incorporation and all amendments thereto; (iii) the Company's Bylaws, as currently in effect as of the date hereof; (iv) selected proceedings of the Company's board of directors and certificates of the Company's officers; and (v) such other documents as I have deemed necessary and relevant to the matter opined upon herein."</p> <p>"I have assumed the genuineness of all signatures, the conformity to authentic original documents of the copies of all such documents submitted to me as certified, conformed and photocopied, including the quoted, extracted, excerpted and reprocessed text of such documents."</p> <p>"On the basis of the foregoing, and in reliance thereon, I am of the opinion that the Shares subject to resale by the Selling Stockholders pursuant to the Registration Statement and the related Prospectus, when issued will be validly issued, fully-paid and nonassessable Shares."</p>

Issuer	Date	Letter Title	Recipient	Signatory	Misrepresentations
Issuer 9	5/8/2018	Adequate Current Information	OTC Markets Group, Inc.	Thomas J. Craft, Jr. Esq.	<p>"In preparing this letter, I have examined such corporate records and other documents and such questions of law as we considered necessary or appropriate for the purpose of rendering this letter; including the Certificate of Incorporation, as amended, and Bylaws of the Issuer as well as its annual reports for its years-ended December 31, 2017 and 2016 containing the Issuer's unaudited financial statements as of December 31, 2017 and 2016, respectively, together with the Issuer's OTC Pink Basic Disclosure, that have been filed with OTC Markets Group, Inc. (the 'OTC') and such other corporate documents and such questions of law as we considered necessary or appropriate for purposes of rendering this letter."</p> <p>"As to matters of fact in this letter, I have also relied upon information from officers of the Issuer and other sources, which sources I believed to be reliable. In such examination, I have assumed the genuineness of all signatures set forth on each document, the authenticity of all original documents and the conformity to original documents-of all copies of such documents as may have been supplied to me during the course of my examination. In issuing this letter, I represent as follows:</p> <p>"That the Issuer's previous filings and publicly available information with regard to the Issuer as filed with the OTC Markets Group, Inc.: (i) constitutes "adequate current public information" concerning the Securities and the Issuer and "is available" within the meaning of Rule 14(c)(2) under the Securities Act, (ii) includes all of the information that a broker-dealer would be required to obtain from the 1934 (the 'Exchange Act') . . . .</p> <p>"That I have: (i) communicated with the management of the Issuer, (ii) reviewed the Issuer's filings with the OTC, including its Annual Report for its year-ended December 31, 2017, and other information filed by the Issuer on the OTC Markets Inc. News Service, and (iii) discussed the Issuer's filings with Shlomo Zakai, the Issuer's CFO.</p> <p>"That to the best of my knowledge, after inquiry of management and of the Board of Directors of the Issuer, that neither the undersigned nor the Issuer nor any of its officers and/or directors, or any 5% shareholder is currently under investigation by any federal or state regulatory authority for any violation of federal or state securities laws."</p>
Issuer 3	6/18/2018	Restrictive Legend Removal	Transfer Agent	Thomas J. Craft, Jr. Esq.	<p>"In rendering the opinion set forth herein, I have examined relevant documents, have relied upon the accuracy of such documents and have assumed the authenticity of the signatures thereon and the accuracy of the representations made by the Company and the Seller . . . ."</p> <p>"Based upon the facts set forth above and in reliance upon the documents referred to above and/or provided to me by the Company, the Seller and CNLT, it is my opinion that a new certificate evidencing 300,000 Shares may be issued in the name of CLNT, without restrictive legend, in compliance with</p>

Issuer	Date	Letter Title	Recipient	Signatory	Misrepresentations
					the provision of the Act and the rules and regulation of Rule 144 promulgated by the SEC under the Act."
Issuer 3	7/9/2018	Original Issuance without Legend	Transfer Agent	Thomas J. Craft, Jr. Esq.	<p>"In rendering the opinion set forth herein, I have examined relevant documents, have relied upon the accuracy of such documents and have assumed the authenticity of the signatures thereon and the accuracy of the representations made by the Company and the Issuee . . . ."</p> <p>"Based upon the facts set forth above and in reliance upon the documents referred to above and/or provided to me by the Company and the Issuee, it is my opinion that a new certificates evidencing 416,667 Shares may be issued in the name of the Issuee, without restrictive legend, in compliance with the provision of the Act and the rules and regulations of Rule 144 promulgated by the SEC under the Act."</p>
Issuer 3	7/15/2018	Restrictive Legend Removal	Transfer Agent	Thomas J. Craft, Jr. Esq.	<p>"In rendering the opinion set forth herein, I have examined relevant documents, have relied upon the accuracy of such documents and have assumed the authenticity of the signatures thereon and the accuracy of the representations made by the Company and the Seller . . . ."</p> <p>"Based upon the facts set forth above and in reliance upon the documents referred to above and/or provided to me by the Company and the Seller, it is my opinion that a new certificates evidencing 350,000 Shares may be issued in the name of the Seller or the Seller's designee(s) without restrictive legend, in compliance with the provision of the Act and the rules and regulations of Rule 144 promulgated by the SEC under the Act."</p>
Issuer 6	7/23/2018	Exh. to Reg. Stmt on Form S-1	Issuer; Filed with the Commission	Thomas J. Craft, Jr. Esq.	<p>"For the purpose of rendering my opinion herein, I have reviewed: (i) the revised statutes of the State of Nevada to the extent I deem relevant to the matters opined upon herein; (ii) certified copies of the Registrant's Certificate of Incorporation and all amendments thereto; (iii) the Registrant's Bylaws, as currently in effect as of the date hereof; (iv) selected proceedings of the Registrant's board of directors and certificates of the Registrant's officers; and (v) such other documents as I have deemed necessary and relevant to the matter opined upon herein."</p> <p>"I have assumed the genuineness of all signatures, the conformity to authentic original documents of the copies of all such documents submitted to me as certified, conformed and photocopied, including the quoted, extracted, excerpted and reprocessed text of such documents."</p> <p>"On the basis of the foregoing, and in reliance thereon, I am of the opinion that the Shares subject to resale by the Selling Stockholders pursuant to the Registration Statement and the related Prospectus, when issued will be validly issued, fully-paid and nonassessable Shares."</p>



Issuer	Date	Letter Title	Recipient	Signatory	Misrepresentations
Issuer 3	8/6/2018	Restrictive Legend Removal	Transfer Agent	Thomas J. Craft, Jr. Esq.	<p>"In rendering the opinion set forth herein, I have examined relevant documents, have relied upon the accuracy of such documents and have assumed the authenticity of the signatures thereon and the accuracy of the representations made by the Company and the Issuee . . . ."</p> <p>"Based upon the facts set forth above and in reliance upon the documents referred to above and/or provided to me by the Company and the Seller, it is my opinion that a new certificate evidencing the 250,000 Shares may be issued in the name of the Seller, without restrictive legend, in compliance with the provision of the Act and the rules and regulation of Rule 144 promulgated by the SEC under the Act."</p>