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June 15, 2015

Via Facsimile: (212) 652-5920

OTC Markets Group LLC
304 Hudson Street, 2nd Fl.
New York, NY 10013
Attn: Issuer Services

**Re: Updated Attorney Letter With Respect to Adequate Current Information
GelStat Corporation**

Ladies and Gentlemen:

Please be advised that GelStat Corporation, a Delaware corporation (the “Company”) has retained Nason, Yeager, Gerson, White & Lioce, P.A. (the “Firm”), as its general counsel and has also retained the Firm for the purpose of reviewing its Information and Disclosure Statement Pursuant to Rule 15dc2-11(a)(5) (the “Disclosure Statement”), current information and related financial statements, rendering this Letter and related securities matters. The undersigned attorney is the Attorney referred to in that Attorney Letter Agreement between this Firm and you.

In connection with providing this Letter, we have examined the following documents (collectively, the “Information”):

- (i) The Company’s Annual Report for the years ended December 31, 2014 (posted by the OTC Markets Group on April 15, 2015), December 31, 2013 (posted by the OTC Markets Group on March 31, 2014) and 2012 (posted by the OTC Markets Group on December 11, 2013);
- (ii) The Company’s Quarterly Report for the three months ended March 31, 2015 (posted by the OTC Markets Group on May 20, 2015).
- (iii) The Company’s Disclosure Statement for the March 31, 2015 Quarterly Report

(posted by the OTC Markets Group on May 20, 2015).

- (iv) All prior disclosures posted by the Company with OTC Disclosure and News Service; and
- (v) Such other corporate records as were necessary and provided by management for purposes of this letter.

We have also made such examination of law and have examined originals or copies, certified or otherwise, of such corporate records and documents of the Company, such agreements, certificates of officers or representatives of the Company, and such other records, certificates, including certificates of public officials, and documents as we have deemed relevant and necessary as a basis for the opinions hereinafter expressed, all of which we believed to be reliable. In such examination, we have assumed the genuineness of all signatures, the authenticity of all documents submitted to us as originals and the conformity with authentic original documents of all documents submitted to us as copies. As to any facts relevant to the opinions expressed below, we have relied upon certificates and written and/or oral representations of officers of the Company and public officials. We have not examined or reviewed any communication, instrument, agreement, document or other item or conducted any independent inquiry or investigation of any matter except as otherwise expressly set forth above.

The financial statements are unaudited and were prepared by D. Brooks and Associates, CPA's, P.A. The principal of this firm is David Brooks, CPA. Mr. Brooks presently acts as Chief Financial Officer and Director for Ecosphere Technologies, Inc.; a publicly-traded issuer whose stock trades on the OTC Pink marketplace. In rendering the statements set forth in this Letter, we assume the following:

- (a) the legal capacity of each natural person;
- (b) the power and authority of each person other than the Company or person(s) acting on behalf of the Company to execute, deliver and perform each document executed and delivered and to do each other act done or to be done by such person;
- (c) the authorization, execution and delivery by each person other than the Company or person(s) acting on behalf of the Company of each document executed and delivered or to be executed and delivered by such person;
- (d) that there have been no undisclosed modifications of any provision of any document reviewed by us in connection with the rendering of the statements set forth in this Letter;

- (e) the genuineness of each signature, the completeness of each document submitted to us, the authenticity of each document reviewed by us as an original, the conformity to the original of each document reviewed by us as a copy and the authenticity of the original of each document received by us as a copy;
- (f) the truthfulness of each statement as to all factual matters otherwise not known to us to be untruthful contained in any document encompassed within the due diligence review undertaken by us;
- (g) the accuracy on the date of this Letter as well as on the date stated in all governmental certifications of each statement as to each factual matter contained in such governmental certifications;
- (h) that with respect to the information reviewed and to the transactions referred to therein, there has been no mutual mistake of fact and there exists no fraud or duress.

The qualification of any statement with respect to the existence or absence of facts by the phrase "to our knowledge" or "known to us" means the actual knowledge of the attorneys at this firm involved with the review and negotiation of the information reviewed. I have not conducted an independent audit of the Company or its files.

We call your attention to the fact that lawyers in this Firm are admitted to practice in the State of Florida, and we do not express any opinion with respect to the applicable laws, or the effect or applicability of the laws, of any jurisdiction other than those of the State of Florida, the General Corporation Law of the State of Delaware and the securities laws of the United States of America. The undersigned signatory is permitted to practice before the United States Securities and Exchange Commission and has not been prohibited from practice thereunder. In particular, but without limitation, we do not express any opinion with respect to the Blue Sky or securities laws of any State or other jurisdiction (other than the federal securities laws of the United States of America). The undersigned signatory is a United States resident and admitted to practice law in Florida and New York.

Based upon and subject to the foregoing, we are of the opinion that:

1. The Information (i) constitutes "adequate current public information" concerning the Securities of the Company and "is available" within the meaning of Rule 144(c)(2) under the Securities Act of 1933, as amended, (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 under Rule 15c2-11 under the Securities Exchange Act of 1934, as amended, (iii) complies as to form with

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the OTC Markets Group Guidelines for Providing Adequate Current Information, and (iv) has been posted in the OTC Markets Group News Service.

2. To the best of our knowledge, and after inquiry of management of the Company, neither the Company, nor its officers, directors, 5% holders, or counsel, is currently under investigation by any federal or state regulatory authority for any violation of federal or states securities laws.

3. The Company's Transfer Agent is Action Stock Transfer Corp. Action Stock Transfer Corp is registered with the Securities and Exchange Commission as its appropriate regulatory authority. We confirmed the number of outstanding shares set forth in Item III of the Disclosure Statement by contacting Action Stock Transfer Corp.

This Letter is limited to the date hereof and we do not in any event undertake to advise you of any facts or circumstances occurring or coming to our attention subsequent to the date hereof.

This Letter is being furnished to OTC Markets Group LLC and OTC Markets Group LLC is hereby entitled (i) 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), and (ii) to publish the letter in the OTC Markets Group News Service for viewing by the public and regulators. This Letter may not be used for any other purpose or relied upon by any other person or entity other than OTC Markets Group LLC without our prior written consent.

Very truly yours,

NASON, YEAGER, GERSON, WHITE & LIOCE, P.A.

By:



Michael D. Harris