FORM 3

UNITED STATES SECURITIES AND EXCHANGE COMMISSION

Washington, D.C. 20549

INITIAL STATEMENT OF BENEFICIAL OWNERSHIP OF SECURITIES

OMB APPROVAL

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Filed pursuant to Section 16(a) of the Securities Exchange Act of 1934 or Section 30(h) of the Investment Company Act of 1940

Name and Address of Reporting Person* SPIVEY RON J	2. Date of Ever Requiring State (Month/Day/Ye 04/05/2004	g Statement Day/Year) HALSEY DRUG CO INC/NEW [HDGC]					
(Last) (First) (Middle) C/O HALSEY DRUG CO., INC.			Relationship of Reporting Personal (Check all applicable) Director	10% Owne	r (Mon	5. If Amendment, Date of Original Filed (Month/Day/Year)	
616 N. NORTH COURT, SUITE 120	_		X Officer (give title below) Chief Scientific (Other (spec below) Officer	Appli	Individual or Joint/Group Filing (Check oplicable Line) X Form filed by One Reporting Person	
PALATINE IL 60067						Form filed by Reporting Pe	More than One erson
(City) (State) (Zip)							
Table I - Non-Derivative Securities Beneficially Owned							
1. Title of Security (Instr. 4)			2. Amount of Securities Beneficially Owned (Instr. 4)			Nature of Indirect Beneficial Ownership nstr. 5)	
Table II - Derivative Securities Beneficially Owned (e.g., puts, calls, warrants, options, convertible securities)							
1. Title of Derivative Security (Instr. 4)	2. Date Exerc Expiration Da (Month/Day/)	ate	3. Title and Amount of Securiti Underlying Derivative Security		4. Conversion or Exercise Price of	se Form: Direct (D)	6. Nature of Indirect Beneficial Ownership (Instr. 5)
	Date Exercisable	Expiration Date	Title	Amount or Number of Shares	Derivative Security		
Stock Options	(1)	04/05/2014	Common Stock	3,000,000	0.13	D	

Explanation of Responses:

1. Options vest and are exercisable as follows: (i) 1,000,000 on October 1, 2004; and (ii) 333,333 quarterly thereafter commencing on January 1, 2005 until fully vested.

<u>/s/ Ron J. Spivey</u> <u>04/05/2004</u>

** Signature of Reporting Person Date

Reminder: Report on a separate line for each class of securities beneficially owned directly or indirectly.

- * If the form is filed by more than one reporting person, see Instruction 5 (b)(v).
- ** Intentional misstatements or omissions of facts constitute Federal Criminal Violations See 18 U.S.C. 1001 and 15 U.S.C. 78ff(a).

Note: File three copies of this Form, one of which must be manually signed. If space is insufficient, see Instruction 6 for procedure.

Persons who respond to the collection of information contained in this form are not required to respond unless the form displays a currently valid OMB Number.