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October 20, 2015

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

Re: PharmaRoth Labs, Inc., a Colorado Corporation (the "Issuer") and its securities (the "Securities).

Gentlemen/Ladies:

Please be advised that:

1. OTC Markets Group, Inc. is entitled to rely on this letter ("Letter") to determine whether the Issuer has made current information publicly available within the meaning of Rule 144(c)(2) of the Securities Act of 1933, as amended ("Securities Act").
2. I am a United States resident and have been retained by the Issuer solely for the purpose of rendering this letter and related matters.
3. I have examined such corporate records, other documents, information and such questions of law, as I considered necessary or appropriate for rendering this letter.
4. I am authorized to practice law in the State of Florida. This letter applies to the United States of America and all jurisdictions thereunder. This Letter is not in reliance upon the work of any other counsel.
5. I am permitted to practice before the United States Securities and Exchange Commission ("SEC") and have not been prohibited from practicing thereunder.
6. As to matters of fact, I have relied on information from public officials, the Issuer's officers and all such sources are believed to be reliable.
7. In my examination, I have assumed the genuineness of all signatures on all documents, the legal capacity of natural persons, the authenticity of all documents submitted to us as originals, the conformity to original documents of all documents submitted to us as photostatic copies and authenticity of the originals of the foregoing documents.

8. I have reviewed the following documents pertaining to the Issuer and its Securities in connection with the preparation of the Letter, which are publicly available and posted with the OTC Disclosure and News Service as reflected in: (a) unaudited financial statements for year ended June 30, 2015 posted on October 19, 2015; (d) completed information pertaining to the Issuer with respect to OTC Pink Disclosure Guidelines posted on October 19, 2015.

9. The information in 8 above (i) constitutes "adequate current public information" (the "Information") concerning the Securities and the Issuer and "is available" within the meaning of Rule 144(c)(2) under the Securities 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 ("Exchange Act"), (iii) complies as to form with the OTC Markets Group's OTC Pink Disclosure Guidelines, which are located on the Internet at www.otcmarkets.com, and (iv) has been posted through the OTC Disclosure and News Service.

10. The person responsible for the preparation of the unaudited financial statements contained in the Information is Barry Hall, the Chief Financial Officer of the Issuer, who is located at 8250 West Charleston Boulevard, Suite 110, Las Vegas, Nevada 89117. Barry Hall is qualified to prepare financial statements in accordance with United States Generally Accepted Accounting Principles ("GAAP) by virtue of: (a) 35 years of experience preparing audited/unaudited financial statements in accordance with GAAP; (b) 30 years of Chief Financial Officer experience with public and private companies; and (c) having graduated from San Diego State University in 1976 with a Masters in Business Administration with a concentration in finance and accounting.

11. The Issuer's transfer agent is Pacific Stock Transfer Co., 6725 Via Austi Parkway, Suite 300, Las Vegas, Nevada, which is registered as a transfer agent with the SEC. I have confirmed the number of outstanding shares issued and outstanding as of June 30, 2015 (288,781,637) and October 13, 2015 (319,781,637) by reviewing the shareholder list and though communications with the transfer agent.

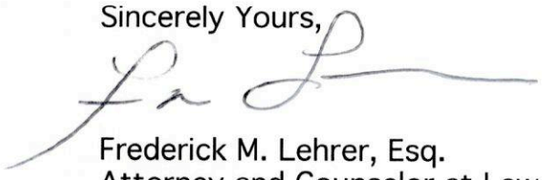
12. I have (i) personally met via Skype session on October 20, 2015 with all of the Issuer's officers and directors, Barry Hall, the Issuer's Chief Financial Officer, and Luis Ornelas Lopez, the Company's Chief Executive Officer/Director, (ii) reviewed the Information published by the Issuer through the OTC Disclosure and News Service and (iii) discussed the Information with the Issuer's Officers that constitute the Issuer's Management and its Board of Directors.

13. To the best of my knowledge, and after inquiring of the Issuer's Officers and Directors and receiving written verification from the Officers and Directors and reviewing/examining the filings with the OTC Disclosure and News Service, neither the Issuer, its Officers/Directors, any 5% shareholder, nor counsel is under investigation by any federal or state

regulatory authority for any violation of any violation of federal or state securities laws.

14. This letter is given solely to OTC Markets Group, Inc. and may not be released to or relied upon by, nor is it intended to benefit, any other person without my prior written consent. OTC Markets Group has full and complete permission to publish the Letter through the OTC Disclosure and News Service for viewing by the public and regulators.

Sincerely Yours,



Frederick M. Lehrer, Esq.
Attorney and Counselor at Law