CMD
CARMEL, MILAZZO & DICHIARA LLP
ATTORNEYS AT LAW

June 7, 2019

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

Re: CTT Pharmaceutical Holdings, Inc.
Sufficiency of Adequate Current Information

Dear OTC Markets,

We have been requested, as securities counsel for CTT Pharmaceutical Holdings, Inc., a Delaware corporation (the "Company"), to render a sufficiency of adequate current information letter (this "Letter") in connection with the filing by the Company of the Company's Annual Report. The Company is required to have filed with the OTC Markets an Annual Report for the year ended December 31, 2018 (the "Annual Report"), pursuant to Rule 15c2-11(a)(5) of the Securities Exchange Act of 1934, as amended, (the "Exchange Act"), and Rule 144(c)(2) under the Securities Act of 1933, as amended (the "Securities Act").

It is of our opinion that the Annual Report and all other documents filed with the OTC Markets Group, Inc. ("OTC Markets"): (i) constitutes adequate current public information concerning the shares of common stock of the Company (the "Securities") 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 Company to public as quotation for the Securities under Rule 15(c)2-11 of the Exchange Act; (iii) complies as to form with the OTC Markets Group's OTC Pink Disclosure Guidelines for Providing Adequate Current Information, which are located on the Internet at www.otcmarkets.com; and (iv) has been updated through December 31, 2018 in the OTC Disclosure and News Service. The OTC Markets 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) of the Securities Act.

In rendering this Letter, we have reviewed such corporate records and other documents as we deemed necessary for purposes of rendering this Letter. In addition, we have made such investigation and have considered such questions of law as we deemed necessary and appropriate for the purposes of rendering this Letter. In all examinations, we have assumed the genuineness of all signatures, the authenticity of all documents received as originals, and the authenticity of all received copies of documents. Further, we have relied on information obtained from the officers of the Company and other sources we deem to be reliable.

The Company's management is responsible for the preparation of the corporate filings. The unaudited financial statements were prepared by Robert Allen, the Company's Chief Financial Officer.

These financial statements are then reviewed by management prior to filing. The primary officer reviewing and approving the financial statements is Cam Birge, the Company's Chief Executive Officer.

The Company's transfer agent is VStock Transfer LLC ("VStock Transfer"), located at 18 Lafayette Place, Woodmere, New York, 11598. Vstock Transfer is registered with the Securities and Exchange Commission. We have confirmed with the Company and Vstock Transfer that as of December 31, 2018 the Company had 47,073,724 shares of common stock issued and outstanding.

We have reviewed the Annual Report including the Company's unaudited financial statements and notes thereto for the year ended December 31, 2018, which were posted on May 23, 2019.

We have personally reviewed the Annual Report including all unaudited financial statements and it is our opinion that the Annual Report comports with all necessary requirements of Rule 144(c)(2) of the Securities Act, and that the Annual Report accurate and contains current information regarding the Company. We have personally spoken with the Company's management and a majority of the Company's directors to discuss the Company's Annual Report for the year ended December 31, 2018, posted on the OTC Markets on May 23, 2019.

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

The Company is not a "shell company" as defined in Rules 405 of the Securities Act and 12b-2 of the Exchange Act.

This letter confirms that the Company issued restricted shares to us, in payment for our services rendered, on the following dates:

- 07/07/2017 – 319,999 restricted shares.
- 09/13/2017 – 104,472 restricted shares.
- 10/1/2017 – 80,000 restricted shares.
- 11/21/2017 – 33,333 restricted shares.
- 05/09/2018 – 44,357 restricted shares.

The aforementioned shares may be sold when registered by the Company or an exemption from registration exists.

I, Peter DiChiara, Partner at Carmel, Milazzo & DiChiara LLP, am a resident of the United States of America and am admitted to practice law in the state of New York. I have never been prohibited from practicing before the SEC, I am not currently, or has been in the past five years, suspended or barred from practicing in any state or jurisdiction, and I have not been charged in a civil or criminal case. I am not under investigation by any federal or state regulatory authority for any violation of federal or state securities laws.

This Letter covers the laws of the state of New York and the laws of the United States of America. This Letter does not rely on the work of other counsel.

While this Letter is intended exclusively for use and reliance by the OTC Markets, the same is hereby granted full and complete permission and rights to publish this Letter through the OTC Disclosure & News Service for viewing by the public and regulators.

Please email me at pdichiara@cmdllp.com if you have any questions or concerns.

Sincerely,

/s/ Peter DiChiara

Peter DiChiara
Partner at Carmel, Milazzo &
DiChiara LLP