

Allen C. Tucci

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June 1, 2017

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

Re: 024 Pharma, Inc. (EEIG)

Dear Sir or Madam:

I have been asked by 024 Pharma, Inc. (the “Issuer”) to provide OTC Markets, Inc. a letter with respect to the information publicly disclosed by the Issuer and published in the OTC Disclosure and News Service. I understand that this letter will be posted by the Issuer and will be published, accompanying the Issuer’s disclosure, in the OTC Disclosure and News Service. OTC Markets, Inc. is entitled to rely on such letter in determining whether the Issuer has made adequate current information publicly available within the meaning of Rule 144(c)(2) under the Securities Act of 1933.

I am a U.S. resident and have been retained by the Issuer for the purpose of rendering this letter and related matters. I am serving as disclosure counsel for the Issuer and have been retained also for the purpose of reviewing the current information supplied by the Issuer. I have examined such corporate records and other documents and such questions of law as I have considered necessary or appropriate for the purpose of rendering this letter.

I am licensed to practice law in the state of PA, DE and NY. I am allowed to practice before the SEC and am not prohibited from practicing before it. This letter applies to the laws of the United States of America. As to matters of fact, I have relied on information obtained from public officials, officers of the Issuer and other sources and all such sources are believed to be reliable.

I have reviewed all the documents provided to OTC Markets, Inc. by the Issuer in connection with its Disclosure Statement posted to OTCmarkets.com on May 22, 2017, including unaudited Financial Statements for the years ended 2015 and 2016 and the quarterly statement for the quarters ending March, June and September of 2016, and March, June and September of 2015. The information referred to herein (i) constitutes “adequate current public

information” concerning the Securities and the Issuer and “is available” within the meaning of Rule 144(c)(2) under the Securities Exchange 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 Ruler 15c2-11 under the Securities Exchange Act of 1934; (iii) complies as to form with the Sheets Guidelines for Providing Adequate Current Information, which are located on the internet at www.otcm Markets.com; and (iv) will be posted in the OTC Disclosure and News Service.

The person responsible for preparing the financial statement contained in the disclosure by the Issuer was Xiao Hua Gong as President and Director for the Issuer, who is qualified to prepare such financial statements by virtue of professional experience and education. The financial statements have not been audited.

The Issuer’s transfer agent is Fidelity Transfer Co., Sandy, Utah (the “Agent”). The Agent is registered with the SEC. I have used the transfer agent’s records to confirm the number of issued and outstanding shares of the Issuer as set forth in the Disclosure Statement and Financial Statements.

I have also reviewed the information published by Issuer on the OTC Disclosure and News Service and have personally met with and discussed the information with management and a majority of the directors of the Issuer.

To the best of my knowledge, after inquiry of management and directors of the Issuer, neither the Issuer, any 5% shareholder, or any counsel is currently under investigation by any federal or state regulatory authority for any violation of federal or state securities laws.

No person other than OTC Markets, Inc. is entitled to rely on this letter, however, OTC Markets, Inc. has full and completed permission and right to publish the letter in the OTC Disclosure and News Service for viewing by the public.

Sincerely,

A handwritten signature in blue ink, appearing to read 'A. Tucci', with a stylized flourish at the end.

WHITE AND WILLIAMS LLP
Allen C. Tucci