

JACKSON L. MORRIS

Attorney at Law

Admitted in Florida and Georgia

February 6, 2017

OTC Markets Group, Inc.
2nd Floor
304 Hudson Street
New York, NY 10013

Re: Immunotech Laboratories, Inc.
Trading symbol: IMMB

Ladies and Gentlemen:

I have been engaged as special counsel to Immunotech Laboratories, Inc., a Nevada corporation with its headquarters office located at 120 West Pomona Avenue, Monrovia, California 91016 ("Issuer"), to provide this letter with respect to the information ("Information") publicly disclosed by the Issuer and published through the OTC Disclosure and News Service, including all information published at <http://www.otcm Markets.com/stock/IMMB/profile> and related pages. The Issuer's common stock ("Securities") is quoted on OTC Pink and is traded in the over-the-counter market. Please be advised that Pink OTC Markets is entitled to rely on this letter in determining whether the Issuer has made adequate current public information publicly available within the meaning of Rule 144(c)(2) under the Securities Act of 1933 ("Securities Act"). It should be noted that Rule 144(c)(2) does not define or provide a standard for public availability of information. In using this term, I refer to any information which is available to the public from any source, including information which requires payment of a fee to a public official. In particular, the Rule does not require publication of information on or through the OTC Disclosure & News Service.

The Information covered by this opinion includes and is limited to information under the Issuer's control on the "Company Info" tab and the items of information indexed on the "Filings and Disclosure" tab, as follows:

<u>Information Item*</u>	<u>Period End Date</u>	<u>Publish Date</u>
Annual Report	December 31, 2016	February 3, 2017

I am a citizen and resident of the United States of America. From time to time, I have provided and expect to provide legal services to the Issuer in the areas of corporate, business transactions and securities law. I now have and have had no other relationship with the Issuer, except that I am the owner of 800,000 shares of the Issuer's common stock which I have received in payment of legal fees. I am licensed to practice law in Florida and Georgia. The subject matter of this letter covers the jurisdictions of the State of Florida (the Issuer's state of incorporation) and the laws of the United States of America. I have not relied on the work of any other attorney in rendering the opinions set forth below. I am permitted to practice before the U.S. Securities and Exchange Commission and am not prohibited from such practice.

For the purpose of this letter, I have reviewed, to the extent I deem relevant to the matters covered by this letter, and relied upon the following:

Documents publicly available -

- a. a true copy of the Issuer's Articles of Incorporation and bylaws;
- b. information published by the Issuer through the OTC Disclosure & News Service on OTCMarkets at the Internet address of <http://www.otcmarkets.com/stock//IMMB/profile> and related pages, in particular, the documents listed on the "Filings and Disclosure" page in the active category;
- d. a list of all transfer agents registered as of June 2, 2011 with the U.S. Securities and Exchange Commission ("Commission") pursuant to Section 17A of the Securities Exchange Act of 1934, as amended, as provided by the staff of the Commission;
- e. the Issuer's web site at <http://www.immunotechlab.com>.

Documents not publicly available -

- a. agreement dated July 26, 2012 engaging Pacific Stock Transfer Company as the Issuer's transfer agent ("Transfer Agent");
- b. a confirmation by email from the Transfer Agent to the Issuer dated January 31, 2017 confirming the number of shares of the Issuer's common stock issued and outstanding on that date ("I&O Confirmation") certified by the Transfer Agent and provided to me by the Issuer.

I have also reviewed and relied upon such other documents and certificates of the Issuer and of public officials as I have deemed necessary and relevant to the subject matter this letter. I have assumed the due and proper election or appointment of all persons signing and purporting to sign the documents in their respective capacities, as stated therein, the genuineness of all signatures, the conformity to authentic original documents of the copies of all such documents submitted to me as certified, true, conformed and photocopied, including the quoted, extracted, excerpted and reprocessed text of such documents. As to matters of fact, I have relied on information obtained from public officials, officers of the Issuer and other sources, which I believe to be reliable.

I have also reviewed and am familiar with Rule 144 under the Securities Act and Rule 15c2-11 under the Securities Exchange Act of 1934 (the "Exchange Act"). It should be noted that the only information required by Rule 144(c)(2) that is required to be publicly available is limited to the information identified in paragraphs (a)(5)(i) to (xiv) and (a)(5)(xvi) of Rule 15c2-11. The required information is less extensive than the information identified in OTC Pink Basic Disclosure Guidelines Version 1.1, April 25, 2013.

The Information (i) constitutes "adequate current public information" concerning the Securities and the Issuer and "is available" within my understanding of 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 (see Appendix "A", hereto), (iii) complies as to form with OTC

Pink Basic Disclosure Guidelines Version 1.1, April 25, 2013, and (iv) has been published through the OTC Disclosure & News Service.

I have been advised by the Issuer that Austin Accounting and Tax, of Las Vegas, Nevada, is responsible for the preparation of the financial statements contained in the Information. The financial statements are not audited. Austin Accounting and Tax specializes in federal income tax preparation and dispute resolution.

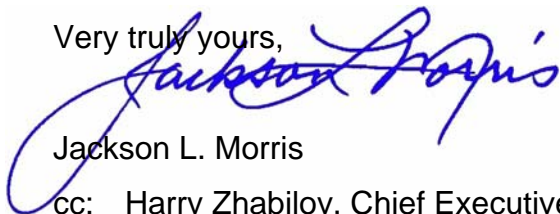
The Transfer Agent's address is Suite 300, 6725 Via Austi Parkway, Las Vegas, Nevada 89119. According to information obtained from the Commission, the Transfer Agent was registered with the Commission pursuant to Section 17A of the Exchange Act as of June 2, 2011 and I have no reason to believe such registration has been terminated. The I&O Confirmation states that the number of issued and outstanding shares of common stock at the close of business on the date thereof was 574,964,967 shares.

I have (i) personally met with management and a majority of the directors of the Issuer, (ii) reviewed the Information published by the Issuer through the OTC Disclosure & News Service and (iii) 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 a majority of the directors of the Issuer, neither of the Issuer, any five percent holder of the Issuer's securities is, nor am I, currently under investigation by any federal or state regulatory authority for any violation of federal or states securities laws.

No person other than OTC Markets Group is entitled to rely on this letter. Notwithstanding this limitation of reliance, I hereby grant OTC Markets Group full and complete permission and right to publish this letter through the OTC Disclosure & News Service for viewing by the public and regulatory agencies; provided, that such permission to publish and the publication hereof shall not be deemed a waiver of the limitations of reliance set forth in this paragraph.

Very truly yours,



Jackson L. Morris

cc: Harry Zhabilov, Chief Executive Officer
Immunotech Laboratories, Inc.