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December 24, 2018

OTC Markets Group, Inc.
304 Hudson Street, 3rd Floor
New York, NY 10013

RE: Purespectrum, Inc. ("The Issuer")

Dear Sir or Madam:

I represent Puresprectrum, Inc., (Symbol: PSRU), a Delaware corporation (the"Issuer") as its legal counsel. My client has requested that I render a legal opinion as to whether there is adequate current information available on the OTC Disclosure and News Service for the Issuer and related matters relative to its Annual Reports for the periods ended December 31, 2016 and December 31, 2017, and its quarterly reports for the periods ended March 31, 2018, June 30, 2018 and September 30, 2018, including related financial reports for the preceding two years. I am not an employee of the Issuer.

This letter is meant to apply to the laws of the United States. I am a resident of the United States and licensed to practice in the state courts of Oregon and Washington and am also admitted to practice in the U.S. District Court for the District of Oregon and in the U.S. Tax Court. I am also permitted to practice before the Securities and Exchange Commission ("SEC"), and have not been prohibited from practice thereunder.

I have examined the corporate records, documents and such questions of law that I consider necessary or appropriate for purposes of rendering this Opinion Letter. In my review I have met with the Board of Directors and management of the Issuer and have relied upon the representations of management and officers whom I believe to be reliable sources. In addition, I have reviewed the definition of "current information" set forth in Rule 144(c) of the Securities Act of 1933 (the "Act"), and the OTC Markets Group's Guidelines for Providing Adequate Current Information. I have reviewed the Issuer's corporate records including the following:

- Annual Report - Company Information and Disclosure Statement for the year ended December 31, 2016 (posted December 11, 2018)
- Annual Report - Company Information and Disclosure Statement for the year ended December 31, 2017 (posted December 13, 2018)
- Quarterly Report - Company Information and Disclosure Statement for the quarter ended March 31, 2018 (posted December 16, 2018)
- Quarterly Report - Company Information and Disclosure Statement for

the quarter ended June 30, 2018 (posted December 16, 2018)

- Quarterly Report - Company Information and Disclosure Statement for the quarter ended September 30, 2018 (posted December 17, 2018)

In my review I have relied upon the representations of management and officers of the Issuer and on publicly available information regarding the Issuer including financial statements listed above.

I have spoken with management and all of the information I requested as a basis for this opinion has been provided to me and I believe the sources of information reviewed are reliable. In addition, I have reviewed the definition of current information set forth in SEC Rule 144(c)(2) under the Act ("Other Public Information") as well as the relevant provisions of Rule 15c2-11 of the Securities Exchange Act of 1934 (the "Exchange Act"), and the OTC Markets Group's Guidelines for Providing Adequate Current Information, In my opinion, the information provided:

(A) constitutes "adequate public information" concerning the Securities and the Issuer and "is available' within the meaning of Rule 144(c)(2) of the Act;

(B) 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 Exchange Act;

(C) complies as to form with the OTC Markets Group's Guidelines for Providing Adequate Current Information, which is located at:

www.otcmarkets.com

and

(D) has been posted through the OTC Disclosure and News Service.

The financial statements for the Issuer for these periods were the responsibility of Xavier Mitchell, 3010 Wilshire Blvd, Suite 304, Los Angeles, CA 90010, president and CEO of the Issuer. These financial statements have not been audited or presented as such. They were prepared internally by or under the supervision of Mr. Mitchell. Mr. Mitchell has extensive experience managing companies and other business interests and is well qualified by experience to prepare these financial statements with assistance from qualified accountants when needed.

The transfer agent for the Issuer is Transfer Online, 512 SE Salmon Street, Portland, OR 97214. The transfer agent is registered with the SEC. I have requested and obtained a copy of the shareholders' list provided to me by management and have confirmed that the number of shares issued is consistent with the corporate records of the Issuer. I have reviewed the disclosure documents currently published on ottcmarkets.com for this Issuer, and have personally reviewed the information published by the Issuer on OTC Markets News Service, and have discussed the information with management.

I have confirmed with management that management is not aware of any investigation of the Issuer or of any beneficial owner, officer,

director or legal counsel of the Issuer by any federal or state regulatory authority, including the SEC. After a review of documents as set forth above, and consultation with management, it is my opinion that the information presently being provided by the Issuer to OTC Markets Disclosure and News Service in the Financial Reports and Disclosure Information constitutes adequate current public information concerning the Issuer within the meaning of Rule 144(c)(2) of the Act.

OTC Markets, Inc., is entitled and authorized to rely upon this letter in determining whether the Issuer has made adequate information publicly available within the meaning of Rule 144(c)(2) under the Securities Act of 1933. No person other than OTC Markets, Inc., is entitled to rely on this letter, but full permission is granted to OTC Markets, Inc., to publish this letter through the OTC Disclosure and News Service for viewing by the public and regulators.

Sincerely,

Vic Devlaeminck
Attorney for Purespectrum, Inc.
VD/wp