

***LAW OFFICES
OF
KRAMER, LLC***

260 Madison Avenue
16th Floor
New York, NY 10016

Tel.(212) 490-1616
Facsimile (212) 490-2888
eck@lawkram.com

February 23, 2021

OTC Markets Group
Attn: Issuer Services
304 Hudson Street, 3rd Floor
New York, NY 10013

To Whom It May Concern:

We are attorneys for Patient Access Solutions Inc., a Nevada Corporation (the "Company"). The Company's trading symbol is PASO.

The Company has requested that we review the Company's financial statements and Annual Report for the fiscal year ending October 31, 2020 (the "Annual Report"). The Annual Report was posted on the OTC Disclosure and News Service (the "Service") on February 19, 2021. We submit this letter to OTC Markets Group, Inc. on the Company's behalf.

The undersigned, a United States resident admitted to practice law in the State of New York, is permitted to practice before the Securities and Exchange Commission (the "SEC") and has not been prohibited from practice before the SEC, the U.S. Commodity Futures Trading Commission ("CFTC"), the Financial Industry Regulatory Authority ("FINRA"), or any other federal, state, or foreign regulatory agency. The undersigned is not currently, and has not in the past five years, been suspended or barred from practicing in any state or jurisdiction and has not been charged in a civil or criminal case.

Law Offices of Kramer, LLC ("Kramer Law") of which the undersigned is the sole member, serves as counsel to the Company and neither the undersigned nor Kramer Law owns or expects to be issued shares of common stock or other equity of the Company.

With respect to the Annual Report, we have examined the following corporate records and other documents, including those which have been made publicly available through the Company's posting of such documents to www.otcm Markets.com through the Service which we have considered necessary or appropriate for purposes of rendering the letter (collectively the "Information").

1. The Annual Report, which was posted through the Service on February 19, 2021.
2. The Company's unaudited financial statements for the fiscal year ended October 31, 2020 and notes for the financial statements for the year ended October 31, 2020, which were posted through the Service on February 19, 2021. These documents were prepared by Bruce Weitzberg, the CEO and CFO of the Company. Mr. Weitzberg is not an accountant. Mr. Weitzberg is the individual responsible for the preparation of the unaudited financial statements contained in the Information.

The Company's transfer agent is Empire Stock Transfer, Inc., which is registered with the SEC. As of October 31, 2019, the number and classification of the Company's shares outstanding were (i) 422,853,751 shares of common stock and (ii) 10,000,000 shares of Preferred A stock. As of October 31, 2020, the number and classification of the Company's shares outstanding were (i) 1,157,825,270 shares of common stock; (ii) 10,000,000 shares of Preferred A stock; and (iii) 244,312 shares of Preferred C stock. We confirmed the information contained in this paragraph with the Company's transfer agent. I received an email confirmation from Rico Portero, principal at Empire Stock Transfer Inc., the Issuer's transfer agent, confirming that it is registered with the SEC.

In connection with rendering this opinion, I have investigated such matters and examined such documents as I have deemed necessary. In examining the documents, I have assumed the genuineness of signatures (both manual and conformed), the authenticity of documents submitted as originals, the conformity with originals of all documents furnished as copies, and the correctness of the facts set forth in such documents. Nothing came to my attention during the course of my investigation that led me to conclude that any such documents were not genuine or authentic or that the acts set forth therein were not true.

As to matters of fact upon which counsel has relied and obtained, directly or indirectly from public officials including officials of OTC Markets Group, and from officers of the Company and other sources, I have believed such sources to be reliable,

I have reviewed the most recent Company's OTC Markets Disclosures, which are available on the OTC Markets website. Due to the Covid-19 pandemic, I have met, by phone, with Bruce Weitzberg, the CEO and a board member of the Issuer, as well as with Robert Linzalone, the Vice President and a board member, concerning the matters in this letter. Based upon the examination and inquiry as set forth above, I am of the opinion that the Company is not presently, but may have been in the past, a "shell company" as that term is defined in Rules 405 of the Securities Act of 1933 and 12b-2 of the Exchange Act of 1934. For example, specific reference is made to the Form 10KSB filed by the Company with the SEC for the fiscal year ended October 31, 2007 in which the Company reported that it was a shell company as defined in Rule 12b-2 of the Exchange Act.

I have spoken with Bruce Weitzberg, the CEO and CFO of the Company, who confirmed that the financial statements that he prepared are not audited, and that he believes such financial statements are materially accurate and prepared in accordance with GAAP. Mr. Weitzberg confirmed that he prepared the financial statements, that he holds a B.S. in Business Management, a minor in accounting, has more than 20 years' experience in preparing and reviewing financial statements and is familiar with GAAP requirements for financial statements like those prepared by the Company. I have confirmed that the Company has previously made filings with the Securities and Exchange Commission, but ceased doing so when it filed its Form 15 on March 23, 2009.

For purposes of preparing this letter, we do not express any opinion with respect to the applicable laws, or the effect or applicability of the laws, of any jurisdiction other than those of the State of New York and the securities laws of the United States. As to matters of fact, we have relied upon information received from Mr. Weitzberg, whom we believe to be reliable.

Based upon and subject to all of the foregoing statements, assuming the accuracy of the documents set forth in paragraphs numbered (1) and (2) above, we are of the opinion that the Information (i) constitutes "adequate current public information" with respect to the Company and the securities quoted on OTC pink "is available" within the meaning of Rule 144(c)(2) promulgated pursuant to the Securities Act of 1933, as amended (ii) includes all of the information which a broker-dealer would be required to obtain from the Company in order to publish a quotation for the securities pursuant to Rule 15c2-11 promulgated under the Securities Exchange Act of 1934, as amended, including items (A) through (N) of Rule 144(b)(5)(i), generally complies as to form with the OTC Market Group's Pink Basic Disclosure Guidelines, which are located on the Internet at www.otcm Markets.com and (iv) has been posted through the OTC Disclosure and News Service.

After inquiry of Mr. Weitzberg and Mr. Linzalone, the officers and directors of the Company and who also hold 5% or more of the Company, they have confirmed that they have no knowledge that the Company or any of the Company's 5% or greater stockholders are currently under investigation by any federal or state regulatory authority for any violation of federal or state securities laws.

This letter may be relied upon by OTC Market Group, Inc. in determining whether the Company has made adequate current information publicly available within the meaning of Rule 144(c)(2) under the Securities Act of 1933, as amended. This letter may not be relied upon by any other person or entity other than OTC Markets Group, Inc. However, OTC Markets Group, Inc. has full and complete permission and rights to publish this letter through the OTC Disclosure and News Service for viewing by the public and regulators. This opinion speaks only as of the date above written and is limited to laws and regulations now in effect, and in all respects is subject to any, and may be limited by, future legislation, regulatory pronouncements and case law. We hereby expressly disclaim any duty to update any of the statements made herein.

Very truly yours,

Law Offices of Kramer, LLC



By: _____
Edward C. Kramer