

**LAW OFFICES OF
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March 27, 2023

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

Re: Herborium Group, Inc.

Gentlemen:

This firm serves as special securities counsel to Herborium Group Inc., (hereinafter the "Company"). We have been retained by the Company for the purpose of posting this opinion letter on the OTC Disclosure and News Service.

The OTC 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 of 1933.

The undersigned attorney serves as special securities counsel to the Company. The undersigned attorney is a resident of the United States of America and has been retained by the Company to render this letter, and for other matters. The undersigned attorney is licensed to practice law in Florida and this letter covers the jurisdictions of Florida and the applicable laws of the United States of America. The undersigned attorney is permitted to practice before the Securities and Exchange Commission and has not been prohibited from practice before the SEC.

In rendering this letter, I have examined: (1) the Annual Disclosure Statement for the fiscal year ended November 30, 2022, (hereinafter the "Disclosure Statement") which was posted by the Company on the OTC Disclosure and News Service on February 15, 2023; (2) the Annual Disclosure Statement for the fiscal year ended November 30, 2021 which was posted by the Company on April 4, 2022, the Quarterly Reports of the periods ended February 28, 2022, May 31, 2022 and August 31, 2022 (collectively the "Other Reports") which were posted by the Company on the OTC Disclosure and News Service on May 2, 2022, July 17, 2022 and December 28, 2022; and (3) such other Company records, officer's

certificates, certificates of public officials, and other instruments and documents, and reviewed such questions of law as I have considered necessary and

certificates, certificates of public officials, and other instruments and documents, and reviewed such questions of law as I have considered necessary and appropriate as a basis for the opinions expressed herein. The Company maintains a November 30th fiscal year-end. All sources referenced in this letter are deemed to be reliable. In rendering this letter, the undersigned Attorney personally met via Facetime with management and all the sole Director of the Company, Agnes P. Olszewski and reviewed and discussed the Disclosure Statement and the Other Reports which were filed on the dates referenced above with her.

In the opinion of the undersigned attorney, the Disclosure Statement constitutes "adequate current information" that is "publicly available" within the meaning of Rule 144 (c) (2) under the Securities Act of 1933, as a result of the Disclosure Statement for the fiscal year ended November 30, 2022 being posted on March February 15, 2023 on the OTC Disclosure and News Service and the other Reports posted by the Company on the OTC Disclosure and News Service on the dates set forth above. The Disclosure Statement includes all of the information that a broker-dealer would be required to obtain from the Company to publish a quotation for the Securities of the Company under Rule 15c2-11 under the Securities Exchange Act of 1934, and the Disclosure Statement complies fully as to form with the OTC "Guidelines for Providing Adequate Current Information".

The un-audited financial statements contained in the Disclosure Statement The Financial Statements were prepared by Mr. Robin Hunt, President of Interactive Edgar Corp., whose address is 17318 Dawkins Road, New Haven, IN 46747. Mr. Hunt has over 30 years of experience as an executive officer, consultant, and principal in private business enterprises. Mr. Hunt has over 30 years of experience in working with and understanding GAAP accounting principles and preparing GAAP statements and has a degree in business administration. In addition to the Company's financial statements, Mr. Hunt also prepares financial statements for other public companies which are listed on the OTC Markets and some of which are fully reporting SEC companies.

The transfer agent for the Company is Colonial Stock Transfer Co., Inc., 66 Exchange Place, Suite 100, Salt Lake City, Utah 84111. Colonial Stock Transfer Co., Inc. is registered with the SEC under the Securities Exchange Act. The undersigned attorney personally confirmed the number of outstanding shares set forth in the Disclosure Statement with an account representative of Colonial Stock Transfer Co., Inc.

Based upon my review of the Company's SEC and OTC filings, the Company has not been a shell company since September 18, 2006, and is currently not a shell company as defined in Rule 405 of the Securities Act of 1933 and 12b-2 of the Exchange Act of 1934. On that date, the Company, through its wholly owned subsidiary, completed a reverse triangular merger with Herborium, Inc. with Herborium, Inc. being the surviving company. At the time of the reverse merger, Herborium, Inc. was an active company and was never a shell. In the 8-K which

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was filed with the SEC and reported the reverse triangular merger, the Company disclosed that it had filed for reorganization under Chapter 11 of the United States Bankruptcy Code and that prior to the closing of the merger, it was a shell company, which shell status was presumably based upon the Chapter 11 even though the Company was operational during the Chapter 11 and despite the fact that in its previous SEC filings, the Company reported that it was not a shell and appeared to be an active Company. Based upon that 8-K filing, undersigned counsel cannot opine that the Company was never a shell.

To the best knowledge of this law firm, after inquiry of management and the Directors of the Company, neither the Company nor any 5% holder is currently under investigation by any Federal or state regulatory authority for any violation of Federal or state securities laws. Furthermore, undersigned counsel, is not currently nor has he been in the past five years (1) been suspended or barred from practicing in any state of jurisdiction; (2) been charged in any civil or criminal case; (3) is not currently, or has in the last five years, been the subject of an investigation, hearing, or proceeding by 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. In addition, the undersigned attorney has never received shares of the Company and has no agreement to receive shares of the Company's stock in payment for services. The OTC is hereby granted 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 letter is rendered solely to OTC Markets Group and may not be relied upon by any other person or for any other purpose without the prior written consent of this law firm.

Very truly yours,



Eric P. Littman
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