



KORDESTANI LEGAL PARTNERS

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June 08, 2021

Vanessa Countryman,
Secretary,

Melissa R. Hodgman,
Acting Director,

United States Securities and Exchange Commission,
Division of Enforcement,
100 F Street, N.E., Washington, D.C. 20549

**Re: In the Matter of RICH PHARMACEUTICALS, INC.
Administrative Proceeding - File No. 3-20348
Order Instituting Administrative Proceedings and Notice Of Hearing
INITIAL ANSWER**

Messrs Hodgman and Countryman:

Set forth below is an initial overture and response from Rich Pharmaceuticals, Inc. (the "**Company**," "**we**," "**us**" or "**our**") to comments received from the staff of the Division of Enforcement (the "**Staff**") of the Securities and Exchange Commission (the "**Commission**") by letter dated May 27, 2021, File No. 3-20348 (the "**Order**"). Any references below correspond to the Order unless otherwise specified.

The Company hereby respectfully submits this letter as an Answer to the allegations contained in this Order, as provided by Rule 220(b) of the Commission's Rules of Practice, 17 C.F.R. § 201.220(b).

Initially the Order begins by declaring that the Company is an administratively dissolved Wyoming corporation – the Company would like to respectfully counter this as incorrect as the Company was properly reinstated on March 7, 2021 (please find attached Certificate of Reinstatement).

OS Received 06/11/2021

Indeed the Company had been delinquent in its periodic filings with the Commission, having not filed any periodic reports since it filed a Form 10-K for the period ended March 31, 2018.

New Company management and the Company itself hereby acknowledge the Staff's comment as to these delinquencies, and have been on a concerted effort over the last 3 months since the 'corporate reinstatement', in having engaged SEC counsel, accountants, auditors, and this office in order to correct the filing delinquencies, as well as actively engaging with legacy debt holders of the Company in order to re-negotiate and institute new and acceptable terms that can get the Company into momentum; additionally, the Company has begun to engage a customer base and begin to transact business that it hopes shall be very profitable for its investors in the near term.

The Company WILL meet its filing obligations; an administrative proceeding or suspension will derail the current momentum of the Company in reinstating its operations and being completely current with the Commission, and will act to be antithetical to the interests of the Commission for the protection of the investors of the Company, as the Company is actively working to renegotiate its debts and to reestablish the business of the Company in the best interest of the investors.

The Company asks any such proceedings for a potential suspension to be tabled for sixty (60) calendar days, at which time the Company will have provided the Commission with all its past and current periodic filings, so that the Company is no longer delinquent in any fashion with the Commission.

Additionally, the Company, through its representatives, has tried to reach out to the Commission's offices and left several messages in the last week, in a sincere hope to begin a person-to-person dialogue towards the above, and hereby resubmits its earnest request for an allotted sixty (60) day period in which time the Company to effectuate all needed filings, so that the Company is current in all respects with the Commission.

The Company wishes to also respectfully ask for specific details as to the public hearing before the Commission, pursuant to Rule 110 of the Commission's Rules of Practice, 17 C.F.R. § 201.110, as well as a prehearing conference pursuant to Rule 221 of the Commission's Rules of Practice, 17 C.F.R. § 201.221.

We look forward to imminently speaking with the Commission as well as to getting the Company moving forward in collaboration with and under the watchful eye of the Commission.

Respectfully submitted,

/s/ Harrison P. Kordestani

Harrison P. Kordestani, Esq.
Attorney for Rich Pharmaceuticals, Inc.



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WY Secretary of State
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Profit Corporation
Certificate of Reinstatement

A Wyoming Profit Corporation under W.S. 17-16-1421 may apply to the Secretary of State for reinstatement within two (2) years after the effective date of dissolution/revocation.

1. Name of the Profit Corporation: **RICH PHARMACEUTICALS, INC.**
2. Effective date of dissolution/revocation: **06/09/2019**
3. The grounds for dissolution/revocation have been eliminated.
4. The corporation's name satisfies the requirements of W.S. 17-19-401.

Signature: *Marcus Laun* **Date:** **03/07/2021**
Print Name: **Marcus Laun**
Title: **President/Director**

Contact Person: **Marcus Laun**
Email: **marcus@richpharmaceuticals.com**
Daytime Phone #: **(917) 514-2110**

STATE OF WYOMING
Office of the Secretary of State

I, EDWARD A. BUCHANAN, Secretary of State of the State of Wyoming, do hereby certify that the certificate of dissolution for the entity listed below has been canceled and this entity has been reinstated effective **March 7th, 2021** as the grounds for dissolution/revocation have been eliminated.

CERTIFICATE OF REINSTATEMENT

RICH PHARMACEUTICALS, INC.

I have affixed hereto the Great Seal of the State of Wyoming and duly executed this official certificate at Cheyenne, Wyoming on this **7th** day of **March, 2021** at **6:51 PM**.



Filed Date: 03/07/2021

A handwritten signature in black ink that reads "Edward A. Buchanan".

Secretary of State

Filed Online By:

Marcus Laun

on 03/07/2021