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April 15, 2015

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

Re: Adequacy of Current Information – Global Clean Energy Inc. – GCEI;
Annual Report for fiscal year ended December 31, 2014

To Whom It May Concern:

Global Clean Energy Inc., a Maryland corporation, (the "Company") has retained me for the purpose of rendering my opinion as to whether there is adequate current information available on the OTC Disclosure and IQ News Service regarding the Company and related matters within the meaning of Rule 144(c)(2) under the Securities Act of 1933 (the" Act") and other matters.

OTC Markets alone is entitled to rely on this opinion in determining whether the Company has made adequate current information publicly available within the meaning of the securities and Exchange Commission Rule 144(c).

I, Tom Sawyer, the undersigned attorney, am a resident of the United States and have been retained by the Company for the purpose of this opinion and related corporate and securities law matters. The Company has retained me to review the current information supplied by the Company and as its ongoing disclosure counsel. I am licensed to practice before all courts in the State of Texas and have not been prohibited from practice before the Securities Exchange Commission (the "SEC").

As to matters of fact, I have reviewed and examined such corporate records and documents as I have deemed necessary and appropriate for this opinion, including but not limited to those listed below and the Annual statement for the fiscal year ending December 31, 2014 and believe the sources of such factual information, officers and directors of the Company and the transfer agent of the Company to be reliable. I have assumed all information contained in all documents reviewed are accurate copies of the originals and are true and correct, including that all signatures are genuine.

Documents Reviewed:

1. Articles of Incorporation, as amended, Bylaws and Minutes of Meetings of Stockholders and the Board of Directors and Actions taken by Written Consent in Lieu of Meeting by the Board of Directors;

2. The Company's Initial Disclosure Statement including the financial statements contained therein;

3. The December 31, 2014 statement of changes in stockholder's equity;

4. This Annual Report;

5. Representations of the Company's Officers and Directors.

6. The Issuer's website.

The Issuer has posted the following information to the OTC Disclosure and News Service over the past 24 months:

Documents:	Date Posted:
The Company's 2012 Annual Report	April 17, 2013
March 31, 2013 Quarterly Report	May 20, 2013
Revised report March 31, 2013 Quarterly Report	May 29, 2013
June 30, 2013 Quarterly Report	August 16, 2013
September 30, 2013 Report	November 8, 2013
Revised September 30, 2013 Quarterly Report	November 11, 2013
The Company's 2013 Annual Report	April 15, 2014
March 31, 2014 Quarterly Report	May 15, 2014
June 30, 2014 Quarterly Report	August 11, 2014
September 30, Quarterly Report	November 17, 2014
The Company's 2014 Annual Report	April 15, 2015

I have personally met with management and the directors, reviewed the information published by the Company through the OTC Disclosure and News Service and discussed the information with management and the directors of the Company.

I am of the opinion that the Annual Report ending December 31, 2014 constitutes "adequate current information" concerning the Company and its securities and is "publicly available" within the meaning of SEC Rule 144(c)(2) under the Securities Act of 1933 as amended. The report includes all of the information that a broker-dealer would be required to obtain from the Company to publish a quotation for the Company's securities under SEC Rule 15c2-11 under the Securities Exchange Act of 1934 as

amended and complies as to form with the Guidelines for Providing Adequate Current Information. The information has been posted on the OTC Disclosure and News Service.

Except for the specified informational items contained in the definition of "adequate current information" cited above, no opinion is being provided that the Company has disclosed all material information regarding its history, business and management or that the Company's publicly disclosed information does not include any untrue statement of a material fact or omits to state any material fact necessary to make the disclosures, in the light of the circumstances under which such prospectus is or is to be used, not misleading. No opinion is being given as the registration under or availability of an exemption from the registration requirement of the Securities Act of 1933 for any outstanding share of the Issuer's common stock.

The person responsible for the preparation of the unaudited financial statements contained in the information is Mr. Kenneth Adessky, Chief Financial Officer of the Company. The Company has retained the below listed Certified Public Accountants as consultants on the preparation of its' financial statements in accordance with Generally Accepted Accounting Principles. The Company's auditors listed below have completed audits for 2012 and 2013 which are included in this year's annual report.

M&K CPA'S PLLC
4100 North Sam Houston Parkway, Suite 200-B
Houston, Texas 77040

The Company's Transfer Agent is:
Transhare Corporation
4626 South Broadway
Englewood, Colorado 80113

Transhare Corporation is registered under the Exchange Act and is an SEC approved transfer agent. The regulatory authority of the transfer agent is the SEC. I have relied on information provided to me by Transhare Corporation in the form of a certified shareholder list and updated representations by the Company as to any changes there from and documents relating to the issuance of securities to confirm the number of shares outstanding.

To the best of my knowledge, after inquiry of management and the Board of Directors of the Company, neither the Company, nor any 5% or greater stockholder, nor counsel is currently under investigation by any federal or state regulatory authority for any violation of federal or state securities laws.

No person or entity other than OTC Market Group is entitled to rely on this opinion and I hereby grant OTC Market Group's full and complete permission and rights to publish this opinion on the OTC Market Group's News Service for viewing by the public and regulators.

Sincerely,

Tom Sawyer

Tom Sawyer