

January 24, 2022

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

Re: Attorney Letter for Innovest Global, Inc.

Ladies and Gentlemen:

Innovest Global, Inc., a Nevada corporation ("*Innovest*" or the "*Company*"), has requested that Kohrman Jackson & Krantz LLP ("*KJK*") provide this attorney letter (this "*Letter*") with respect to the information publicly disclosed by Innovest and published through the OTC Disclosure & News Service. Innovest's shares of common stock, par value \$0.001 per share (the "*Securities*"), are traded on the OTC Link. The OTC Markets Group, Inc. ("*OTC Markets Group*") is entitled to rely on this Letter in determining whether Innovest has made adequate current information publicly available within the meaning of Rule 144(c)(2) under the Securities Act of 1933. No person other than OTC Markets Group is entitled to rely on this Letter, but OTC Markets Group may publish this Letter through the OTC Disclosure & News Service for public viewing.

Counsel

KJK is an Ohio law firm serving as counsel to Innovest on a variety of matters and has been retained by NovAccess for the purpose of rendering this Letter, but has not been engaged to prepare the Information (as defined below). I am a partner of KJK and chair of the firm's securities practice group and the partner primarily responsible for legal services provided by KJK to Innovest. I am a U.S. resident.

I am authorized to practice law in the State of Ohio. I am permitted to practice before the Securities and Exchange Commission (the "*SEC*") and have not been prohibited from practice thereunder.

I am not currently, and have not in the past 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. I am not currently under investigation by any federal or state regulatory authority for any violation of federal or state securities laws. I am not currently, and have not in the past five years, been suspended or barred from practicing in any state or jurisdiction, or charged in a civil or criminal case.

I do not own any shares of Innovest. I have neither received, nor have any agreement to receive in the future, shares of Innovest stock in payment for services.

Information Reviewed

We have examined such corporate records and other documents and such questions of law as we considered necessary or appropriate for purposes of rendering this Letter.

CLEVELAND

1375 East Ninth Street
One Cleveland Center + 29th Floor
Cleveland OH 44114

COLUMBUS

10 West Broad Street
One Columbus Center + Suite 1900
Columbus OH 43125

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On December 9, 2021, I reviewed the following documents posted by Innovest on the OTC Market Group's OTC Disclosure & News Service: (i) Innovest's consolidated financial statements for the year ended December 31, 2020 posted April 29, 2021 under the title Annual Report — Annual Report; consolidated financial statements for the quarter ended March 31, 2021 posted November 2, 2021 under the title Quarterly Report — Q1 3-31-21; consolidated financial statements for the quarter ended June 30, 2021 posted November 30, 2021 under the title Quarterly Report — Q2 6-30-21; and consolidated financial statements for the quarter ended September 30, 2021 posted November 29, 2021 under the title Quarterly Report — Q3 Financial Statements (collectively, the "*Financial Statements*"); and (ii) Innovest's Annual Report for the year ended December 31, 2020 posted April 29, 2021 under the title Supplemental Information — Supplemental Information; Quarterly Report for the quarter ended March 31, 2021 posted November 2, 2021 under the title Quarterly Report — Q1 Disclosure Statement 3-31-21; Quarterly Report for the quarter ended June 30, 2021 posted November 30, 2021 under the title Quarterly Report — Q2 6-30-21 Disclosure; Quarterly Report for the quarter ended September 30, 2021 posted November 30, 2021 under the title Quarterly Report — Q3 9-30-21 Disclosure Report; and Company Press Release titled "Innovest Global, Inc. to Accelerate Objectives; GPC Capital and New Leadership" posted November 19, 2021 (together with the Financial Statements, the "*Information*").

Assumptions and Limitations

As to matters of fact, we relied on information obtained from public officials, officers of NovAccess and other sources; all such sources were believed to be reliable. This Letter is based solely on the facts and assumptions set forth in this Letter and is specifically limited to the investigation and examinations stated.

In our examination of the documents, we have assumed the genuineness of all signatures, the legal capacity of all natural persons, authenticity of documents submitted to us as originals, the conformity with originals of all documents delivered as copies, and the correctness of the facts set forth in such documents when the facts were found to be outside the scope of our examination. For the purposes of rendering this Letter, we have assumed that no person or entity has engaged in fraud or misrepresentation regarding the inducement relating to, or the execution or delivery of, the documents reviewed. Furthermore, we express no opinion as to the validity of any of the assumptions, form or content of any financial or statistical data contained therein. We have gathered and relied on information we deemed relevant that we obtained from public records, officers of Innovest, and other sources. We also find the following documents, due to their nature and source, to be self-authenticating: certified records of regularly conducted foreign and domestic business activity, public records and reports, domestic public documents under seal, foreign public documents, official publications, and other acknowledged documents.

This Letter addresses the laws of the United States only (specifically the Securities Act of 1933 (the "*Securities Act*") and the Securities Exchange Act of 1934 (the "*Exchange Act*"). I am not authorized to practice law in the State of Nevada, Innovest's state of incorporation.

This Letter is based on our knowledge of the law and facts as of today's date or as otherwise indicated in this Letter. We assume no duty to communicate with you with respect to any matter that comes to our attention after the date of this Letter.

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Statements

The Information (i) constitutes “adequate current public information” concerning the Securities and the Issuer and “is available” within the meaning of Rule 144(c)(2) under the Securities Act, (ii) includes all of the information that a broker-dealer would be required to obtain from Innovest to publish a quotation for the Securities under Rule 15c2-11 under the Exchange Act, (iii) complies as to form with the OTC Markets 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 & News Service.

The Financial Statements are not audited. Galina Garrison, the vice president, delivery of Letzhangout LLC, an accounting consulting firm, was responsible for the preparation of the Financial Statements with oversight from L. Michael Yukich, Innovest’s former chief financial officer. Ms. Garrison is a certified public accountant with more than ten years of experience in both in-house positions and with independent accounting firms. Mr. Yukich has extensive financial and accounting experience and for the past twenty years he has held the position of chief financial officer for both public and private companies.

Shaheed Bailey, is the sole director of Innovest and the Company’s interim chief executive and financial officer. I have spoken with Mr. Bailey on several occasions. I have met on multiple occasions with Daniel G. Martin, the company’s former chief executive officer, and Mr. Yukich, the Company’s former chief financial officer. I have spoken to Ms. Garrison on multiple occasions. I reviewed and discussed the Information with Mr. Bailey on January 21, 2022.

The transfer agent for the Company’s common stock is:

Pacific Stock Transfer Company
6725 Via Austi Pkwy, Suite 300
Las Vegas, Nevada 89119

Pacific Stock Transfer Company is registered with the SEC.

I have obtained reports issued by Pacific Stock Transfer Company confirming that the number of shares of the Company’s common stock issued and outstanding was: 191,119,957 on December 31, 2020 (the Company’s 2020 annual report and financials lists 183,737,957 shares, but that number was corrected in subsequent quarterly reports); 208,372,457 on March 31, 2021; 216,302,457 on June 30, 2021; and 217,182,457 on September 30, 2021.

To the best of my knowledge, after inquiry of management and the directors of Innovest, neither Innovest nor any holder of 5% or more of Innovest’s common or preferred stock, is currently under investigation by any federal or state regulatory authority for any violation of federal or state securities laws.

Innovest acquired Chagrin Safety Supply, LLC on October 23, 2017 and has not been a “shell company” as defined in Rules 405 of the Securities Act and 12b-2 of the Exchange Act since that date. Information published by the Company through the OTC Disclosure & News Service before October 23, 2017 indicates that the Company held mineral right assets, but I am unable to

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determine whether the Company or its predecessors was ever a shell company before October 23, 2017.

Conclusion

We express no opinion as to any matter other than as expressly set forth above, and no opinion on any other matter may be inferred or implied from this Letter.

Sincerely,


CHRISTOPHER J. HUBBERT
Partner | KJK

cc: Shaheed Bailey
CEO and CFO

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