Gallagher&Kennedy

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April 24, 2017

Via US Mail:
OTC Markets, Inc.
304 Hudson Street
Second Floor
New York, New York 10013

Via E-Mail and US Mail:
Attn: Jean Ekobo, President
BioNovelus, Inc.
15560 N. Frank Lloyd Wright Blvd., Suite B4-421
Scottsdale, AZ 85260
JEkobo@cox.net

Re: Legal Opinion concerning Adequate Current Information of BioNovelus, Inc. (Symbol-ONOV)

Dear Mr. Ekobo:

As we have discussed, you, on behalf of BioNovelus, Inc., a Nevada corporation (the "Company"), have retained this firm to render an opinion as to the Company's compliance with the Guidelines for Disclosure of Adequate Current Information. This firm is a United States citizen and has been retained for the purpose of reviewing the information supplied by the Company. OTC Markets is entitled to rely on the current legal opinion in determining whether the Company has made adequate current information available within the meaning of Rule 144(c)(2) under the Securities Act of 1933.

In rendering this opinion, we have examined and relied upon the following documents provided by the Company: (i) the Company's Annual Report for the year ending December 31, 2016; (ii) the Company's Quarterly Report for quarter ending March 31, 2016; (iii) the Company's Quarterly Report for quarter ending June 30, 2016; (iv) the Company's Quarterly Report for quarter ending September 30, 2016; (v) certificates as to the legal existence and good standing of the Company, certified by the Office of the Secretary of State of the State of Nevada; (vi) the current By-Laws of the Company; (vii) the Minutes of the Company taken at meetings held in 2016.

In our examination, we have assumed (without investigation) the genuineness of all signatures, the legal capacity of natural persons, the authenticity of all documents submitted to us as originals, the conformity to original documents of all documents submitted to us as certified or photostatic copies, and the authenticity of the originals of such copies. As to any facts material to this opinion letter, we have relied solely upon the corporate records and other documents of the Company described above, certificates, statements and representations of officers and other representatives of the Company (written and oral), and certificates of public officials. As to any matters described herein which are stated to be based upon our knowledge, or the like, we have reviewed and relied upon those documents, certificates, and corporate or other records described above, but have not made any independent investigation (including, without limitation, any examination of any docket of any court or governmental agency) as to matters of fact with respect to such matters, and matters so qualified are limited to the actual knowledge of attorneys at Gallagher & Kennedy who have devoted substantial attention to such documents, certificates, and corporate or other records and the transactions contemplated thereby. In rendering this opinion, we have assumed that no party will exercise, waive, or modify any right or remedy except in a commercially reasonable manner and in good faith.

We are members of the bar of The State of Arizona and our opinions herein are limited to the effect on the subject transactions and documents only of the internal laws of the United States of America, the State of Arizona, and the applicable federal securities laws to the extent that such laws are relevant to the scope of this opinion (without giving effect to conflict of laws principles). We express no opinion as to the laws of any other jurisdiction.

Based upon and subject to the foregoing, we are of the opinion that:

1. The Company is a corporation duly incorporated, validly existing and in corporate good standing under the laws of The State of Nevada.

2. The Company has the corporate power and authority to carry on its businesses as now conducted and as presently proposed to be conducted.

3. The Annual and Quarterly Reports referenced above as filed: (i) constitute adequate current public information concerning the shares of common stock of the Company (the "Securities") and is available within the meaning of Rule 144(c)(2) under the Securities Act; (ii) include all of the information that a broker-dealer would be required to obtain from the Company to publish a quotation for the shares of the Securities under Rule 15(c)2-11 of the Exchange Act; (iii) comply as to form with the Pink Sheets Guidelines for Providing Adequate Current Information, which are located on the internet at www.otcmarkets.com; and (iv) have been posted in the Pink Sheets News Service on March 31, 2017, and available at https://www.otcmarkets.com/stock/ONOV/filings.

Jean Ekobo, the Company's President, is responsible for the preparation of the financial statements set forth in the Financial Reports (the "Financial Statements"). The Financial Statements are not audited. Mr. Ekobo is not admitted to the PCAOB.

The Company's transfer agent (the "Transfer Agent") during calendar year 2016 was VStock Transfer, LLC, 18 Lafayette Place, Woodmere, New York 11598. The Transfer Agent is registered with the Securities and Exchange Commission.

This opinion is rendered to you solely for OTC Markets, Inc.'s determination as to whether the Company has made adequate current information publicly available within the meaning of Rule 144(c)(2) under the Securities Act and may not be referred to, used, or relied upon by you in any other capacity or by any other person without our prior written consent in each case. This opinion is based upon our knowledge of the law and facts as of the date hereof and assumes no event will take place in the future which would affect the opinions rendered herein. We assume no duty to communicate with you with respect to any change in law or facts which comes to our attention hereafter.

Very truly yours,

GALLAGHER & KENNEDY, P.A.

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