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April 7, 2025

OTC Markets Group Inc.
300 Vesey St. 12th Floor
New York, New York 10282

Re: Adequacy of Current Information – Global Clean Energy Inc. – GCEI;
Annual Report for fiscal year ended December 31, 2024

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).

This opinion letter meets all formal requirements cited in the latest Exhibit A “Attorney Letter Guidelines.”

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 asked me to review current information supplied by the Company as its ongoing disclosure counsel. I am licensed to practice before all courts in the State of Texas, am allowed to appear before the Securities Exchange Commission (the “SEC”) and have not been prohibited from practice before the Securities Exchange Commission. I am not currently nor in the past five years have I 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. Further, I have never been suspended or barred from practicing law in any state or federal jurisdiction.

As to matters of fact, I have reviewed and examined such corporate records and documents as I deem necessary and appropriate for this opinion, including but not limited to those listed below and the Company’s annual statement for the fiscal year ending December 31, 2024. I believe the sources of such factual information, officers and directors of the Company and the transfer agent of the Company, to be reliable. I assumed all information contained in 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, 2024, statement of changes in stockholder's equity;
4. Representations of the Company's Officers and Directors.
5. The Issuer's website.

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

<u>Documents:</u>	<u>Date Posted:</u>
The Company's 2022, Annual Report	April 3, 2023
March 31, 2023 Quarterly Report	May 11, 2023
June 30, 2023, Quarterly Report	August 9, 2023
September 30, 2023, Quarterly Report	October 26, 2023
The Company's 2023 Annual Report	April 4, 2024
March 31, 2024, Quarterly Report	May 20, 2024
June 30, 2024, Quarterly Report	August 13, 2024
September 30, 2024, Quarterly Report	November 18, 2024
The Company's 2024 Annual Report	March 27, 2025

I personally met with Gerald Enloe, Chairman and Director, Paul Whitton, Director, Earl Azimov, CFO, Steven Mann President and Director, Ken Adessky, consultant and I reviewed information published by the Company through the OTC Disclosure and News Service and discussed the information with management and directors of the Company.

I am of the opinion that the Annual Report ending December 31, 2024 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 company has never been nor is it presently considered a shell company. The report includes all information that a broker-dealer would need 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 with the Guidelines for Providing Adequate Current Information. The information has been posted on the OTC Disclosure and News Service.

Except for specified informational items contained in the definition of "adequate current information" cited above, no opinion is being provided which suggests the Company has disclosed all material information regarding its history, business and management or that the Company's publicly disclosed information includes an untrue statement of a material fact or omits to state any material fact necessary to make disclosures, in the light of the circumstances under which such prospectus 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 Company has retained the Certified Public Accountants listed below as consultants on the preparation of its financial statements in accordance with generally accepted accounting principles.

Friedman CPA Group
8201 Peters Road, Suite 1000
Plantation, Florida, 33324
friedmancpagroup.com

The Company's Transfer Agent is:
Transhare Corporation
Bayside Centre 1
17 755 North US Highway 19,
Suite 140
Clearwater FL. 33764

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 thereto and documents relating to the issuance of securities to confirm the number of shares outstanding. The total number of shares outstanding showed 582,246,211 as reflected in the annual report.

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 violation of federal or state securities laws.

Neither my firm or myself has received or has agreement to receive in the future shares of the issuers stock in payment for services.

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,

(s) Tom Sawyer

Tom Sawyer
Attorney at Law