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July 29, 2024

OTC Markets Group Inc.  
300 Vesey Street, 12<sup>th</sup> Floor  
New York, NY 10282

Ladies and Gentlemen:

Our firm has been retained as outside general counsel for Energy Finders, Inc. ("Energy Finders"). I am a resident of the United States of America and have been retained by Energy Finders for the purpose of providing this letter and related matters. I am admitted to practice law in the states of New Mexico and Utah and this letter relates to the application of the laws of the states of New Mexico and Utah and the United States. I am permitted to practice before the United States Securities and Exchange Commission (the "SEC") and have not been prohibited from practice thereunder. I am not the subject of any investigation, hearing, or proceeding by the SEC, the U.S. Commodity Futures Trading Commission, the Financial Industry Regulatory Authority, or any other federal, state, or foreign regulatory agency, and have not been so in the past five years. I am also not currently suspended or barred from practicing in any state or jurisdiction and have not been charged in any civil or criminal case and have not been so within the past five years. I am not the beneficial owner of any of Energy Finders' securities and have never received (and have no agreement to receive in the future) any shares of Energy Finders' stock in payment for services.

Additionally, to the best of my knowledge after inquiry of the officers and directors of Energy Finders, none of Energy Finders, any 5% holder of Energy Finders, or Energy Finders' counsel is currently under investigation by any federal or state regulatory authority for any violation of federal or state securities laws.

This letter does not rely on the work of other counsel.

In preparation of this letter, I have examined such corporate records and other documents and such questions of law as I considered necessary or appropriate for the purpose of providing this letter. As to matters of fact, I have relied on information obtained from public officials, officers of the issuer, and other sources that I believed to be reliable. In particular, I have reviewed the following documents published through the OTC Disclosure & News Service:

- Amended Annual Report – Energy Finders' Amended Disclosure Report and Annual Financial Statements with Notes for the year ended March 31, 2023, posted July 29, 2024;
- Annual Report – Energy Finders' Disclosure Report and Annual Financial Statements with Notes for the year ended March 31, 2024, posted July 15, 2024;
- Amended Quarterly Report – Energy Finders 3<sup>rd</sup> Quarter Disclosure and Financial Statements with Notes for the quarter ended December 31, 2023, posted February 13, 2024;
- Quarterly Report – Energy Finders 3<sup>rd</sup> Quarter Disclosure and Financial Statements with Notes for the quarter ended December 31, 2023, posted January 18, 2024;

## Michael Best & Friedrich LLP

OTC Markets Group Inc.

July 29, 2024

Page 2

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- Quarterly Report – Energy Finders 2<sup>nd</sup> Quarter Disclosure Statement and Financial Statements with Notes for the quarter ended September 30, 2023, posted November 9, 2023; and
- Quarterly Report – Energy Finders 1<sup>st</sup> Quarter Disclosure Statement and Financial Statements with Notes for the quarter ended June 30, 2023, posted August 21, 2023.

Together, the documents in the above list are referred to as the “Information.”

I have also met by telephone with Energy Finders’ officers and directors (specifically, Mohammed Zulfiquar, its Chief Executive Officer [“CEO”] and Chief Financial Officer [“CFO”] and director, and Keith Pivonski, its Vice President and director), and reviewed and discussed the Information with them.

Energy Finders’ financial statements for the year ended March 31, 2024, have not been audited. Mohammed Zulfiquar, Energy Finders’ CEO and CFO, and Keith Pivonski, its Vice President and a director, are the persons responsible for preparation of Energy Finders’ financial statements. Mr. Zulfiquar and Mr. Pivonski report over 50 years of combined experience with respect to preparing and reviewing financial statements and each of them reports specific experience operating private entities with annual revenues exceeding \$10,000,000 USD prior to their work for Energy Finders, Inc.

Energy Finders’ transfer agent is VStock Transfer, LLC, which is registered with the SEC. I have confirmed the number of outstanding shares disclosed in the Information by comparison with a certified shareholder list provided by email from the transfer agent and adjusting for an issuance of 1,000,000 shares that occurred in September 2023 but has not yet been submitted to the transfer agent for processing.

Based on all of the above, I conclude that the Information (i) constitutes “adequate public information” concerning Energy Finders and its common stock (the “Securities”) and “is available” within the meaning of Rule 144(c)(2) under the Securities Act of 1933, (ii) includes all of the information a broker-dealer would be required to obtain from Energy Finders in order to publish a quotation for the Securities under Rule 15c2-11 under the Securities Exchange Act of 1934, (iii) complies as to form with the OTC Markets Group’s Pink Basic Disclosure Guidelines, and (iv) has been posted through the OTC Disclosure & News Service.

I also conclude that Energy Finders is not currently a “shell company” as defined in Rules 405 of the Securities Act of 1933 and 12b-2 of the Securities Exchange Act of 1934. Energy Finders has been a shell company under those definitions in the past.

**Michael Best & Friedrich LLP**

OTC Markets Group Inc.

July 29, 2024

Page 3

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OTC Markets Group is entitled to rely on this letter in determining whether Energy Finders has made adequate current information publicly available within the meaning of Rule 144(c)(2) under the Securities Act of 1933. OTC Markets Group has full and complete permission and rights to publish this letter through the OTC Disclosure & News Service for public viewing; however, no person other than OTC Markets Group is entitled to rely on this letter for any purpose whatsoever.

Sincerely,

**MICHAEL BEST & FRIEDRICH LLP**

A handwritten signature in black ink, appearing to read "K. Timken", enclosed within a hand-drawn oval.

Kevin C. Timken