



**Michael Best & Friedrich LLP**  
**Attorneys at Law**  
170 South Main Street, Suite 1000  
Salt Lake City, UT 84101  
**Kevin C. Timken**  
D 801.924.4124  
E [kctimken@michaelbest.com](mailto:kctimken@michaelbest.com)

April 10, 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 Kelyniam Global, Inc (“Kelyniam”). I am a resident of the United States of America and have been retained by Kelyniam 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 Kelyniam’s securities and have never received (and have no agreement to receive in the future) any shares of Kelyniam’s stock in payment for services.

Additionally, to the best of my knowledge after inquiry of the officers and directors of Kelyniam, none of Kelyniam, any 5% holder of Kelyniam, or Kelyniam’s 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 or 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:

- Annual Report – Kelyniam Disclosure Report and Annual Financial Statements with Notes for the year ended December 31, 2023, posted March 18, 2024;
- Quarterly Report – Kelyniam 3<sup>rd</sup> Quarter Disclosure and Financial Statements with Notes for the quarter ended September 30, 2023, posted November 12, 2023;
- Semi-Annual Report – Kelyniam 2<sup>nd</sup> Quarter Disclosure and Financial Statements with Notes for the quarter ended June 30, 2023, posted August 11, 2023; and
- Quarterly Report – Kelyniam 1<sup>st</sup> Quarter Disclosure Statement and Financial Statements with Notes for the quarter ended March 31, 2023, posted May 15, 2023.

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

## Michael Best & Friedrich LLP

OTC Markets Group Inc.  
April 10, 2024  
Page 2

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I have also met by telephone with Kelyniam's officers and a majority of its directors (specifically, Ross Bjella, its Chief Executive Officer ["CEO"] and director; Terrance Kurtenbach, its Chief Financial Officer ["CFO"] and director; Mark Smith, director; Desiree Webb, director, and Lisette Grunwell, director), and reviewed and discussed the Information with them.

Kelyniam's financial statements have not been audited. Terrance Kurtenbach, Kelyniam's CFO, is the person responsible for preparation of Kelyniam's financial statements. Mr. Kurtenbach has been a Certified Public Accountant since 1983 and retired as a public accounting firm partner before becoming Kelyniam's CFO.

Kelyniam's transfer agent is Transfer Online, Inc., which is registered with the SEC. I have confirmed the number of outstanding shares disclosed in the Information by email with the transfer agent.

Based on all of the above, I conclude that the Information (i) constitutes "adequate public information" concerning Kelyniam 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 Kelyniam 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 Kelyniam is not and has never been a "shell company" as defined in Rules 405 of the Securities Act of 1933 and 12b-2 of the Securities Exchange Act of 1934.

OTC Markets Group is entitled to rely on this letter in determining whether Kelyniam 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 large, loopy oval shape.

Kevin C. Timken