

## Law Offices of Thomas E. Puzzo, PLLC

---

3823 44<sup>th</sup> Ave. NE

Seattle, WA 98105

USA

Direct: +1 (206) 522-2256

E-mail: [tpuzzo@puzzolaw.com](mailto:tpuzzo@puzzolaw.com)

April 17, 2024

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

**Re: Borneo Resource Investments Ltd.**

Dear Sir or Madam:

We have acted as special counsel to Borneo Resource Investments Ltd., a Nevada corporation (the “Issuer”), and submit this letter (this “Letter”) in connection with information publicly disclosed by the Issuer and published through the OTC Disclosure & News Service of OTC Markets Group Inc. (“OTC Markets Group”).

OTC Markets Group is entitled to rely on this Letter in determining whether the Issuer has made adequate current information publicly available within the meaning of Rule 144(c)(2) under the Securities Act of 1933, as amended (the “Securities Act”).

The undersigned, who has executed this Letter on our behalf, is a U.S. resident and we have been retained by the Issuer for the purpose of rendering this Letter and related matters. We act as counsel for the Issuer on a regular basis, rendering advice with respect to securities laws and regulations and corporations laws. We do not beneficially own any of the Issuer’s securities. We have not received, and we do have an agreement to receive in the future, shares of the Issuer’s stock, in payment for services.

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

The undersigned is authorized to practice law in the State of Washington, and the statements in this Letter are limited to the laws of the State of Washington and the federal laws of the United States of America. The undersigned is permitted to practice before the Securities and Exchange Commission (the “SEC”) and he has not been prohibited from practice thereunder. The undersigned is not currently, and has not been in the past five years, suspended or barred from practicing in any state or jurisdiction. Further, the undersigned is not currently, nor has been in the past five years, 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.

As to matters of fact, we have relied on information obtained from public officials, officers of the Issuer and other sources, and we believe that all such sources are reliable.

In our capacity as special counsel to the Company, we have examined such corporate records and other documents of the Company, including its Articles of Incorporation, as amended, Bylaws, as amended, and certain minutes and consents to action of the Company's board of directors and its stockholders (the "Corporate Documents"), and we have made such other investigations of law and facts as we have deemed necessary to enable us to so make the confirmations expressed below. We have also examined the documents (the "Information") of the Issuer listed below, which documents are publicly available through the OTC Disclosure & News Service:

- (i) Quarterly Report for the quarter ended March 31, 2024, published on April 16, 2024;
- (ii) Annual Report for the year ended December 31, 2023, published on February 6, 2024;
- (iii) Quarterly Report for the quarter ended September 30, 2023, published on October 30, 2023;
- (iv) Quarterly Report for the quarter ended June 30, 2023, published on July 25, 2023;
- (v) Quarterly Report for the quarter ended March 31, 2023, published on May 2, 2023;
- (vi) Annual Report for the year ended December 31, 2022, published on March 23, 2023;
- (vii) Quarterly Report for the quarter ended September 30, 2022, published on November 13, 2022;
- (viii) Quarterly Report for the quarter ended June 30, 2022, published on July 26, 2022;
- (ix) Quarterly Report for the quarter ended March 31, 2022, published on May 13, 2022; and
- (x) Annual Report for the year ended December 31, 2021, published on March 30, 2022.

The Information (i) constitutes "adequate current public information" concerning the shares of common stock (the "Securities") of the Issuer, 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 the Issuer 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](http://www.otcm Markets.com), and (iv) has been posted through the OTC Disclosure & News Service.

The person responsible for the preparation of the unaudited financial statements contained in the Information is Rick Basse, CPA, who to the best of our knowledge, is licensed to practice accountancy in the State of Texas.

The Issuer's transfer agent is Pacific Stock Transfer Co., whose address 6725 Via Austi Parkway, Suite 300, Las Vegas, Nevada 89119. We have confirmed that the transfer agent is registered as a transfer agent with the SEC. To confirm the number of outstanding shares set forth in the Information, the undersigned relied on information provided by the Issuer, the Issuer's transfer agent, including subscription and other agreements, corporate resolutions and court filings.

The undersigned has reviewed the Information, as amended, published by the Issuer through the OTC Disclosure & News Service and discussed the Information with management consisting of Terrence Kirk Filbert, President, Secretary, Treasurer and director of the Issuer, and Ronald S. Chaykin, consultant and accounting advisor to the Issuer. The undersigned has personally met with both of Messrs. Filbert and Chaykin.

To the best of our knowledge, after inquiry of management and the sole director of the Issuer, we believe that neither the Issuer nor any holder of 5% or more of the Issuer's Securities is currently under investigation by any federal or state regulatory authority for any violation of federal or state securities laws. Additionally, to the best of our knowledge, we are not currently under investigation by any federal or state regulatory authority for any violation of federal or state securities laws.

No person other than OTC Markets Group is entitled to rely on this Letter, but OTC Markets Group has full and complete permission and rights to publish this Letter through the OTC Disclosure & News Service for public viewing.

We believe that the Issuer is not a "shell company," as defined in Rules 405 of the Securities Act and 12b-2 of the Exchange Act of 1934.

The statements in this Letter are given as of the date hereof, and we assume no obligation to update or supplement this Letter to reflect any facts or circumstances which may hereafter come to our attention or any changes in laws which may hereafter occur.

This letter is being delivered to OTC Markets for its sole use and benefit and is not to be used, circulated, quoted or otherwise referred to or relied upon for any other purpose without express written consent, except that OTC Markets has full and complete permission and rights to publish this letter through the OTC Disclosure and News Service for viewing by the public and regulators. This letter may not be filed with any governmental agency, other entity or person, without my advance, written consent.

OTC Markets Group Inc.

April 17, 2024

Page 4

It is understood that the undersigned expresses no opinion as to the applicability to or compliance with any state securities laws and regulations. In addition, this letter is given as of the date set forth above and is restricted to the stated facts and circumstances presented to me and described herein, and that any other or different facts and circumstance might require a different letter by me. The undersigned assumes no, and hereby disclaims any, obligation to update or supplement this letter to reflect any facts or circumstances that may hereafter come to my attention or any changes in laws that may hereafter occur.

Sincerely,

LAW OFFICES OF THOMAS E. PUZZO, PLLC

*/s/ Thomas E. Puzzo*

Thomas E. Puzzo