ANDREW I. TELSEY, P.C. Attorney at Law

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May 11, 2016

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

Re: DNA Brands, Inc.

Dear Sir/Madam:

This firm is counsel for DNA Brands, Inc., a Colorado corporation (the "Issuer"). This firm serves as general and securities counsel for the Issuer and has been retained by the Issuer for the purpose of rendering this letter and related matters.

The undersigned counsel is a resident of the United States, licensed to practice law in the State of Colorado and is permitted to practice before the Securities and Exchange Commission and has not been prohibited from practice thereunder.

For the purposes of rendering this letter we have examined such corporate records and other documents and such questions of law as we considered necessary or appropriate and, as to matters of fact, we have relied upon information obtained from public officials, the current sole officer of the Issuer and other sources, which sources we believe to be reliable, including former members of the Company's management..

In connection with the rendering of this letter, we have reviewed the following documents concerning the Issuer and the Issuer's Common Stock which are publicly available and which have been posted through the OTC Disclosure and News Service (the "Information"):

1. Annual Report posted April 20, 2016

and that the Information (i) constitutes "adequate current public information" concerning the Securities and the Issuer and is "available" within the meaning of Rule 144(c)(2) under the Securities Act of 1933 (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 Securities Exchange Act of 1934 (the "Exchange Act"), (iii) complies as to form with the Pink OTC Markets' Guidelines for Providing Adequate Current Information, which are located on the Internet at www.otcmarkets.com, and (iv) has been posted through the OTC Disclosure and News Services.

The unaudited financial statements for the Issuer's fiscal years ended December 31, 2015, contained in the Information were prepared by Adrian McKenzie, the Issuer's sole Officer and Director, and Mr.

Ismael Llera, who was the Company's former comptroller for approximately 7 years. Mr. McKenzie received a Bachelor of Arts degree in economics from the University of Western Ontario in 1999.

The Transfer Agent for the Issuer is Corporate Stock Transfer, Inc., Denver, Colorado ("CST"), and we have confirmed that CST is registered with the Securities and Exchange Commission as a transfer agent. We have confirmed the number of outstanding shares of the Issuer set forth in the posted information from the Issuer's Transfer Agent.

We have (i) personally spoken with the sole member of management of the Issuer, (ii) reviewed the Information published by the Issuer through the OTC Disclosure and News Service, and (iii) discussed the Information with management. Further, after inquiry of management and with the Issuer's Transfer Agent,, to the best knowledge of the undersigned we have determined that neither the undersigned nor any member of this firm, the Issuer of the Securities, nor any five percent (5%) holder is currently under investigation by any federal or state regulatory authority for any violation of federal or state securities laws.

OTC Markets Group, Inc. 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. No person other than OTC Markets Group, Inc. is entitled to rely on this letter. We hereby grant full and complete permission and rights to OTC Markets Group, Inc. to publish this letter through the OTC Disclosure and News Service for viewing by the public and regulators.

Yours very truly,

ANDREW I. TELSEY, P.C.

Andrew I. Telsey
For the Firm

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