

August 26, 2016

OTC Markets Group, Inc.
304 Hudson St., 2nd Floor
New York, N.Y. 10013

Adequate Current Information for VaporBrands International, Inc. (VAPR)

OTC Markets Group, Inc.:

This firm has been retained by VaporBrands International, Inc. (the “Issuer”) for the sole purpose of rendering this opinion as to whether there is adequate current information available on the OTC Disclosure and News Service regarding the Issuer and related matters. As such, OTC Markets Group, Inc. (“OTC Markets Group”) is entitled to rely on such opinion 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.

To begin, I, the undersigned attorney, am a U.S. resident, and my firm has been retained by the Issuer for the purpose of rendering this opinion and related matters. This law firm has been retained for the purpose of reviewing the current information supplied by the Issuer, but may be retained as regular disclosure counsel. Further, I am licensed to practice law in the State of Texas, and this opinion is limited to the laws of the United States. I am permitted to practice before the Securities and Exchange Commission (“SEC”) and have not been prohibited from practice thereunder.

In rendering this opinion, I have examined such corporate records and other documents and such questions of law as counsel considered necessary or appropriate for purposes of rendering this opinion, including but not limited to the following documents:

- (a) Shareholder List of the Company;
- (b) The Issuer’s *Annual Report* for the period ending December 31, 2015 and financial statements which were incorporated as attachments;

I have assumed that (i) all information contained in all documents reviewed by me is true and correct, (ii) all signatures on all documents reviewed by me are genuine, (iii) all documents submitted to me as originals are true and complete, (iv) all documents submitted to me as copies are true and complete copies of the originals thereof, and (v) each natural person signing any document reviewed by me had the legal capacity to do so. As to matters of fact, I have relied on information obtained from public officials, officers of the Issuer and other sources, and these sources are believed to be reliable.

The Issuer has posted its *Annual Report* for the year ending December 31, 2014 to the OTC Disclosure and News Services on March 30, 2016 along with required exhibits and attached financials for all required periods, (“Information”). I have reviewed the Information published by the Issuer on the OTC Disclosure and News Service on and before March 30, 2016, and, after a reasonable investigation, it is my opinion that that the Information (i) constitutes “adequate current information” concerning the Issuer’s securities and is “available”, within the meaning of Rule 144(c)(2) under the United States Securities Act of 1933, as amended, (ii) the Information includes all of the information that a broker-dealer would be required to obtain from the issuer to publish a quotation for such issuer’s securities under Rule 15c2-11 under the United

States Securities Exchange Act of 1934, as amended, (iii) complies as to form with the OTC Markets Group's Guidelines for Providing Adequate Current Information, which are located on the Internet at www.otcmarkets.com, and (iv) the Information has been posted through the OTC Disclosure and News Service.

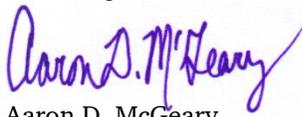
Other related matters relating to this opinion as required are as follows:

1. The person responsible for preparation of the unaudited financial statements contained in the Information is Pamela Copper. Ms. Cooper graduated from Southern Methodist University with a Bachelor of Business Administration degree in Accounting, and has broad experience in core accounting and financial reporting.
2. The Issuer's transfer agent is First American Transfer, Inc. which is registered with the SEC. I relied on information provided to me by the transfer agent in the form of a Shareholder List to confirm the number of outstanding shares set forth in the Information.
3. I have (i) personally met via teleconference with management and a majority of the directors of the Issuer, (ii) reviewed the Information, as amended, published by the Issuer through the OTC Disclosure and News Service and (iii) discussed the Information with management and a majority of the directors of the Issuer.
4. To the best of my knowledge, after inquiry of management and the directors of the Issuer, neither the Issuer of the securities, any 5% holder of such securities, nor counsel is 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 opinion, and I hereby grant OTC Markets Group full and complete permission and rights to publish this opinion on the OTC Disclosure and News Service for viewing by the public and regulators.

This opinion letter is governed by, and shall be interpreted in accordance with, the Legal Opinion Accord (the "Accord") of the ABA Section of Business Law (1991). As a consequence, it is subject to a number of qualifications, exceptions, definitions, limitations on coverage and other limitations, all as more particularly described in the Accord, including the General Qualifications and the Equitable Principles Limitation, and this opinion letter should be read in conjunction therewith.

Kind Regards,



Aaron D. McGeary