

# LAW OFFICES OF MARC APPLBAUM, A.P.L.C.

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June 13, 2013

OTC Markets Group, Inc.  
304 Hudson St., 2<sup>nd</sup> Floor  
New York, New York 10013

Re: Attorney Letter with respect to Adequate Current Information for Bravada International, Ltd.(hereinafter, the "Issuer").

Disclosure Statement for the Period Ending December 31, 2012

Ladies and Gentlemen:

This firm has acted as legal counsel for the Issuer, and on its behalf we have been asked to prepare this Letter of Counsel ("Letter"). OTC Markets Group, Inc. ("OTC Markets") is entitled to rely on such 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 with regard to the Issuer's common stock (the "Securities"). This law firm (or "Counsel" or "we") is a professional corporation, incorporated in the state of California and the undersigned counsel is a U.S. resident.

The undersigned is authorized to practice law in the state of California and is permitted to practice before the Securities and Exchange Commission (the "SEC") and has not been prohibited from practice before such agency. The opinion expressed below is limited to the federal laws of the United States of America and the laws of the State of Delaware, the state where the Issuer is incorporated.

Without relying on the work of other counsel, we have examined such corporate records and other documents and such questions of law as considered necessary or appropriate for purposes of rendering the letter and have relied on the information herein (the "Information") obtained from public officials, officers of the Issuer and other sources believed to be reliable. As noted, in connection with rendering this opinion, we have investigated such matters and examined such documents as deemed necessary. In examining the documents, we have assumed the genuineness of signatures, the authenticity of documents submitted as originals, the conformity with originals of all documents furnished as copies and the correctness of facts set forth in such documents. We have assumed that all information in all documents reviewed by us is true and correct and we have made no independent investigation as to the accuracy or completeness of any factual matters contained in the records, documents and certificates that we have reviewed in connection with the rendered opinion below.

Additionally, Counsel has (i) personally met with management and a majority of the directors of the Issuer, (ii) reviewed the Information, as amended, published by the Issuer through the OTC News Service and (iii) discussed the Information with management and a majority of the directors of the Issuer.

Counsel has reviewed all prior disclosures, as amended, posted by the Issuer with the OTC News Service. All such prior disclosures are believed to be accurate and reliable.

The Information to be relied upon for this opinion is listed below with the date it was posted through the OTC Disclosure and News Service (the "OTC News Service"), if applicable:

- Notification of Late Filing of the Quarter for period end March 31, 2011
- Quarterly Report for period end March 31, 2011
- Quarterly Report for period end June 30, 2011
- Quarterly Report for period end September 30, 2011
- Annual Report for 2011, posted March 6, 2012
- Quarterly Report for period end March 31, 2012
- Quarterly Report for period end June 30, 2012
- Quarterly Report for period end September 30, 2012
- Annual Report for 2012, posted February 28, 2013

The Issuer was incorporated in the State of Delaware in September 1997. The Fiscal Year End for the Issuer is December 31. As of December 31, 2012, the authorized common shares of the Issuer are 742,000,000 at \$0.001 par value, with 700,200,200 common shares outstanding.

The party responsible for the preparation of the financial statements of the Issuer is:

Anna Henke  
7250 Melrose Ave. Unit 6  
Los Angeles, CA 90046  
[annahenke@bravadaltd.com](mailto:annahenke@bravadaltd.com)  
323-424-4195

The financial statements are not audited and **are prepared in accordance with US GAAP**. Ms. Henke has been the Issuer's accounting and officer manager for over a year, and has for over 20 years experience in general bookkeeping, human resources, and office management. Ms. Henke has actively participated in the gathering of the Information for the Issuer's financial statements and has familiar with the Issuer's previous disclosures.

The transfer agent for the Issuer is:

Madison Stock Transfer Inc.  
1688 East 16<sup>th</sup> St.  
Brooklyn, NY 11229  
T: 718.627.4453  
Fax: 718.627.6341

The transfer agent is registered with the SEC. A shareholder list dated as of December 31, 2012 was used by Counsel and the Issuer to confirm the number of outstanding shares set forth in the Annual Report.

The Information, in our opinion, having so reviewed the documents listed above,

- (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, including its dissemination on OTC Markets' disclosure platform;

June 14, 2013

- (ii) includes all of the substantive 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;
- (iii) complies as to form with the OTC Markets Guidelines for Providing Adequate Current Information, available at [www.otcm Markets.com](http://www.otcm Markets.com), and
- (iv) has been posted through the OTC News Service.

To the best of Counsel's knowledge, after inquiry of management and the majority of the directors of the Issuer, neither Counsel, nor any 5% or more holders of the Securities is currently under investigation by any federal or state regulatory authority for any violation of federal or state securities laws.

We express no opinion as to any matter other than as expressly set forth above, and no opinion on any other matter may be inferred or implied from this letter. The opinions expressed herein are given as of the date of this letter, and we disclaim any obligation to advise you of any change in any matter set forth herein.

Very truly yours,



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Marc Applbaum