



DIVISION OF  
CORPORATION FINANCE

UNITED STATES  
SECURITIES AND EXCHANGE COMMISSION  
WASHINGTON, D.C. 20549

June 5, 2014

Via E-mail

Robert H. Armstrong  
Chief Executive Officer  
DC Brands International, Inc.  
1685 S. Colorado Blvd. Unit S291  
Denver, CO 80222

**Re: DC Brands International, Inc.  
Preliminary Information Statement on Schedule 14C  
Filed May 5, 2014  
File No. 000-54031**

Dear Mr. Armstrong:

We completed our review of your filing on May 27, 2014. We remind you that our comments or changes to disclosure in response to our comments do not foreclose the Commission from taking any action with respect to the company or the filing and the company may not assert staff comments as a defense in any proceeding initiated by the Commission or any person under the federal securities laws of the United States. We urge all persons who are responsible for the accuracy and adequacy of the disclosure in the filing to be certain that the filing includes the information the Securities Exchange Act of 1934 and all applicable rules require.

Sincerely,

*/s/ Daniel Greenspan for*

Jeffrey P. Riedler  
Assistant Director

cc: Leslie Marlow  
Gracin & Marlow LLP  
Mission Bay Office Plaza  
20283 State Road &, Suite 300  
Boca Raton, Florida 33498