MORELLA & ASSOCIATES
ATTORNEYS AT LAW
A PROFESSIONAL CORPORATION

Warren J. Archer
Licensed to practice in PA

wjarcher@morellalaw.com
(412) 369-9696 x127

May 11, 2016

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

Re: SW Innovative Holdings, Inc.

Ladies and Gentlemen:

This letter relates to SW Innovative Holdings, Inc., a Texas corporation (the "Issuer"). OTC Markets Group, Inc. ("OTC Markets Group") is entitled to rely upon 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") and the applicable guidelines set by Pink OTC. The undersigned counsel ("Counsel") is a United States resident and serves as corporate and securities counsel to the Issuer. Counsel has no relationship with the Issuer other than as attorney and client, has examined such corporate records and other documents and analyzed such questions of law as I considered necessary or appropriate for the purpose of preparing this letter. Furthermore, Counsel has relied on certain information obtained from public officials, officers of the Issuer and other sources believed to be reliable.

Counsel is licensed to practice law in the Commonwealth of Pennsylvania. Counsel is also permitted to practice before the Securities and Exchange Commission ("SEC") and has never been prohibited from practice before such agency.

In connection with the preparation of this letter, Counsel has reviewed and relied upon the information statements which are currently posted on the Pink OTC relating to the Issuer, including that for the year ended December 31, 2015 (submitted April 1, 2016) (the "Information").

The Information described above, including the Issuer's financial statements for the year ended December 31, 2015, which are unaudited, referenced therein, in Counsel's opinion (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; (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 OTC Markets Group's OTC Pink Disclosure Guidelines which are located on the internet at www.otcmarkets.com; and (iv) has been posted on the OTC Disclosure and News Service.

Please be advised that:

- Norman George, the President of the Company is responsible for the preparation of the financial statements. He has an accounting degree.
- The Issuer's transfer agent is Olde Monmouth Stock Transfer, Co., Inc. (the "Transfer Agent"), 200 Memorial Parkway, Atlantic Highlands, NJ 07716. It is registered with the SEC. Counsel has confirmed from the Transfer Agent the number of outstanding shares set forth in the Information.
- Counsel has (i) personally met with management and the directors of the Issuer; (ii) reviewed the Information, as amended, published by the Issuer on the OTC Disclosure and News Service; and (iii) discussed the Information with management and the directors of the Issuer.
- To the best knowledge of Counsel, after inquiry of management and the directors of the Issuer, none of the Issuer, any five percent (5%) holder or Counsel is currently under investigation by any federal or state regulatory authority for any violation of federal or state securities laws.

OTC Markets Group is hereby given permission to publish this letter in its OTC Disclosure and News Service for viewing by the public and regulators; provided, however, that no person other than OTC Markets Group is entitled to rely on the contents of this letter.

Sincerely,

Warren J. Archer/ljk

Warren J. Archer

WJA/ljk

cc: Norman George, President