

tax on all property in the County subject to such tax, at such rate or rates, limited to two mills per dollar, as may be necessary to pay debt service on the Bonds.

We have acted as Bond Counsel in connection with the issuance and sale of the Bonds. We have reviewed the material in the Official Statement, dated June 9, 2026, relating to the Bonds, set forth under the captions "DESCRIPTION OF THE SERIES 2026 BONDS," "TAX MATTERS," and "APPENDIX D." We have examined the documents and showings referred to in our opinion of even date herewith relating to the Bonds.

Based upon the foregoing and a review of such matters as we have deemed necessary in connection with the rendition of this opinion, it is our opinion that:

1. No registration of the Bonds under the Securities Act of 1933, as amended, and no qualification of the Bond Resolution under the Trust Indenture Act of 1939, as amended, is required in connection with the sale of the Bonds to the public.

2. The statements in the Official Statement under the sections entitled "DESCRIPTION OF THE SERIES 2026 BONDS," "TAX MATTERS," and "APPENDIX D," except for the statement entitled "DESCRIPTION OF THE SERIES 2026 BONDS -- Book-Entry Only System of Registration," are fair summaries of the matters purported to be summarized therein.

3. The obligations of the County to make the Contract Payments required by the Contract when due shall constitute a general obligation of the County for which its full faith and credit are pledged, and the County's obligation to make the Contract Payments required by the Intergovernmental Contract shall be absolute and unconditional so long as the Series 2026 Bonds remain outstanding. The County is obligated to make the Contract Payments and to levy an ad valorem tax (if necessary) on all property in the County subject to such tax, at such rate or rates, limited to two mills per dollar, as may be necessary to produce in each calendar year revenues which will be sufficient to pay the Contract Payments.

We express no further opinion with respect to the accuracy, completeness or sufficiency of the Official Statement or the compliance by the County, the Authority or the Underwriter with any federal or state statute, regulation or ruling with respect to the sale or distribution of the Bonds.

Very truly yours,

POPE FLYNN, LLC

By: _____
a Member