

2026 (the "Contract"), pursuant to which the County agrees to pay to the Authority amounts sufficient to pay the debt service on the Bonds and to levy an ad valorem 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.

In this connection, we have examined (i) an executed counterpart of the Contract, (ii) the proceedings of the County, including without limitation, the resolution of the County adopted on March 12, 2026, as supplemented on June 9, 2026, relating to the approval of the issuance of the Bonds and the terms thereof and the sale of the Bonds to Raymond James & Associates, Inc. (the "Underwriter"), pursuant to the Bond Purchase Agreement, dated June 9, 2026 (the "Purchase Agreement"), among the County, the Authority and the Underwriter, (iii) an executed counterpart of the Purchase Agreement, (iv) a continuing disclosure certificate executed by the County, dated as of June 9, 2026 (the "Disclosure Certificate") and (v) such other documents and matters of law as we have deemed relevant and necessary in rendering this opinion.

Based on the foregoing examination, we are of the opinion that:

1. The County is a duly created and validly existing political subdivision of the State of Georgia with full power and authority to execute, deliver and perform its obligations under the Contract and the Purchase Agreement.
2. The Contract has been duly authorized, executed and delivered by the County and constitutes the legal, valid and binding obligation of the County enforceable in accordance with its terms.
3. The Purchase Agreement has been duly authorized, executed and delivered by the County and constitutes the legal, valid and binding obligation of the County enforceable against the County in accordance with its terms.
4. The Disclosure Certificate has been duly authorized, executed and delivered by the County and constitutes the legal, valid and binding obligation of the County enforceable against the County in accordance with its terms.
5. The Chairman and Board of Commissioners are the duly elected, qualified and acting governing body of the County.
6. The Chairman and Board of Commissioners have duly approved the issuance of the Bonds and the terms thereof prior to the issuance of the Bonds and have duly approved the financing of the Project.
7. The use and distribution of the Preliminary Official Statement, dated May \_\_\_\_, 2026 (the "Preliminary Official Statement") have been duly authorized by the County. The use, distribution and execution of the Official Statement, dated June 9, 2026 (the