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June 27, 2025

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Carty, Harding & Hearn, Inc.
900 S. Shackleford Road
Suite 100
Little Rock, Arkansas 72211

Re: \$16,000,000 Jefferson County Building Commission Lease Revenue Bonds
(Jefferson County Government and Judicial Complex Project), Series 2025

Ladies and Gentlemen:

Reference is made to our opinion delivered today as Bond Counsel for the Jefferson County Building Commission (the "Issuer") in connection with the issuance and sale by the Issuer of its \$16,000,000 Jefferson County Building Commission Lease Revenue Bonds (Jefferson County Government and Judicial Complex Project), Series 2025 (the "Bonds").

At your request, we have reviewed (a) the Bond Purchase Agreement dated June 18, 2025 (the "Bond Purchase Agreement") between the Issuer and Carty, Harding & Hearn, Inc (the "Underwriter") and approved by The County Commission of Jefferson County, West Virginia with respect to the purchase and sale of the Bonds, (b) portions of the Official Statement of the Issuer dated June 18, 2025, relating to the Bonds (the "Official Statement"), and (c) certified copies of proceedings of the Issuer with respect to the Bond Purchase Agreement and the Official Statement, as well as such other papers as we deem necessary for purposes of the opinions expressed below. Capitalized terms used herein and not otherwise defined herein shall have the meanings assigned to them in the Bond Purchase Agreement.

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

1. The Bond Purchase Agreement has been duly authorized, executed and delivered by, and (assuming due authorization, execution and delivery by the Underwriter and that it is a binding agreement of the Underwriter in accordance with its terms) constitutes a binding agreement in accordance with its terms of, the Issuer.

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2. The Series 2025 Bonds are not subject to the registration requirements of the Securities Act of 1933, as amended, and the Indenture is exempt from qualification pursuant to the Trust Indenture Act of 1939, as amended.

3. The statements contained in the Official Statement under the caption "TAX MATTERS" are true and accurate in all material respects and present a fair and accurate summary and description of the matters summarized and described under such caption.

4. Nothing has come to their attention which would lead them to believe that the statements contained in the Official Statement under the captions "INTRODUCTION," "THE LEASE AGREEMENT," "THE INDENTURE," "THE DEED OF TRUST," "THE SERIES 2025 BONDS" (except for the statements referred to therein under "Book-Entry Only System" with respect to The Depository Trust Company), "SECURITY FOR THE SERIES 2025 BONDS," "PLAN OF FINANCE," "APPENDIX C – Forms of Principal Documents," and "APPENDIX E – Form of Opinion of Bond Counsel," insofar as such statements contained under such captions purport to summarize certain matters set forth therein and certain provisions of the Bonds, the Ordinance, the Lease, the Indenture, the Deed of Trust, and the opinion of Bond Counsel, do not present fairly in all material respects the matters referred to therein.

Respectfully submitted,



BOWLES RICE LLP