

FORM OF FINAL OPINION OF BOND COUNSEL

[Letterhead of Quint & Thimmig LLP]

December 14, 2022

Board of Directors
Tulare Local Healthcare District
869 North Cherry Street
Tulare, California 93274

Re: \$3,365,000 Tulare Local Healthcare District Revenue Bonds, Series 2022

Members of the District:

We have acted as bond counsel in connection with the issuance by the Tulare Local Healthcare District (the "District") of its \$3,365,000 Tulare Local Healthcare District Revenue Bonds, Series 2022 (the "2022 Bonds"), pursuant to the provisions of The Local Healthcare District Law, constituting Division 23 of the California Health and Safety Code (the "Law"), Resolution No. 915, adopted by the Board of Directors of the District on November 29, 2022, and an indenture of trust, dated as of December 1, 2022, between the District and The Bank of New York Mellon Trust Company, N.A., as trustee (the "Indenture"). We have examined the law and such certified proceedings and other papers as we deem necessary to render this opinion.

As to questions of fact material to our opinion, we have relied upon representations of the District contained in the Indenture and in the certified proceedings and certifications of public officials and others furnished to us without undertaking to verify the same by independent investigation.

Based upon the foregoing we are of the opinion, under existing law, as follows:

1. The District is duly created and validly existing as a local healthcare district, with the power to enter into the Indenture, perform the agreements on its part contained therein and issue the 2022 Bonds.

2. The Indenture has been duly approved, executed and delivered by the District and constitutes a valid and binding obligation of the District enforceable in accordance with its terms.

3. Pursuant to the Law, the Indenture creates a valid lien on the funds pledged by the Indenture for the security of the 2022 Bonds, subject to no prior lien granted under the Law.

4. The 2022 Bonds have been duly authorized, executed and delivered by the District and are valid and binding special obligations of the District, payable solely from the sources provided therefor in the Indenture.

5. Subject to the District's compliance with certain covenants, interest on the 2022 Bonds is excludable from gross income of the owners thereof for federal income tax purposes and is not included as an item of tax preference in computing the alternative minimum tax for individuals under the Internal Revenue Code of 1986, as amended. For tax years beginning after December 31, 2022, interest on the 2022 Bonds may affect the corporate alternative minimum tax for certain corporations. Failure to comply with certain of such covenants could cause interest on the 2022 Bonds to be includable in gross income for federal income tax purposes retroactively to the date of issuance of the 2022 Bonds.

6. The interest on the 2022 Bonds is exempt from personal income taxation imposed by the State of California.

Ownership of the 2022 Bonds may result in other tax consequences to certain taxpayers, and we express no opinion regarding any such collateral consequences arising with respect to the 2022 Bonds.

The rights of the owners of the 2022 Bonds and the enforceability of the 2022 Bonds and the Indenture may be subject to bankruptcy, insolvency, reorganization, moratorium and other similar laws affecting creditors' rights heretofore or hereafter enacted and also may be subject to the exercise of judicial discretion in accordance with general principles of equity.

In rendering this opinion, we have relied upon certifications of the District and others with respect to certain material facts. Our opinion represents our legal judgment based upon such review of the law and the facts that we deem relevant to render our opinion and is not a guarantee of a result. This opinion is given as of the date hereof and we assume no obligation to revise or supplement this opinion to reflect any facts or circumstances that may hereafter come to our attention or any changes in law that may hereafter occur.

Respectfully submitted,