October 4, 2016

U.S. Bank National Association,
as Master Trustee
Richmond, Virginia

STI Institutional & Government, Inc.
Roanoke, Virginia

Industrial Development Authority of Albemarle County, Virginia
Residential Care Facility Mortgage Revenue Refunding Bonds
(Westminster-Canterbury of the Blue Ridge), Series 2007

Ladies and Gentlemen:

We are delivering this opinion (the "Opinion") in connection with the above-referenced bonds (the "Series 2007 Bonds") under an Indenture of Trust dated as of November 1, 1995, as supplemented and amended (as amended and supplemented, the "1995 Indenture"), between the Economic Development Authority of Albemarle County, Virginia (formerly the Industrial Development Authority of Albemarle County, Virginia, the "Authority") and U.S. Bank National Association, as bond trustee (the "Bond Trustee"). Unless otherwise defined, each capitalized term used in this opinion shall have the meaning given it in Article I of the 1995 Indenture.

Pursuant to resolutions adopted on May 31, 2016, and September 13, 2016, the Authority authorized, among other things, the issuance of its Residential Care Facility Mortgage Revenue Refunding Bond (Westminster-Canterbury of the Blue Ridge), Series 2016B (the "2016B Bond"). The proceeds of the 2016B Bond will be used to redeem the outstanding principal amount of the Series 2007 Bonds (the "Refunded Bonds"). A portion of the proceeds of the 2016B Bond and other available funds will be used to redeem the outstanding principal amount and accrued interest on the Refunded Bonds on January 1, 2017 (the "Redemption Date").

In connection with this opinion, we have reviewed (i) the Master Trust Indenture dated as of March 1, 2007 (the "Original Master Indenture") between Westminster-Canterbury of the Blue Ridge (the "Corporation") and U.S. Bank National Association, as master trustee (ii) the 1995 Indenture, (iii) the Escrow Agreement dated the date hereof; between the Corporation, the Authority and U.S. Bank National Association, as escrow agent and Bond Trustee, pursuant to which the Corporation and the Authority have established an escrow fund (the "Escrow Fund") that is irrevocably pledged to the payment of the indebtedness evidenced by the Refunded

82278933_3
Bonds, (iv) calculations of BB&T Capital Markets, a division of BB&T Securities, LLC, relating to the sufficiency of the funds deposited in the Escrow Fund (the mathematical accuracy of which was verified by Bingham Arbitrage Rebate Services, Inc., Verification Report dated the date hereof (the "Verification Report");) and (v) such other documents and showings and related matters of law as we have deemed necessary in order to render this opinion.

As to questions of fact material to our opinion, we have relied upon (i) representations of the Corporation and the Authority contained in the documents delivered in connection with this closing, (ii) certifications of public officials furnished to us and (iii) certificates of representatives of the Corporation delivered at the closing. Further, we have relied on the Verification Report with respect to the sufficiency of the proceeds applied in accordance with the terms of the above-referenced instructions to pay on the Redemption Date, the redemption price of and accrued interest on the Refunded Bonds in accordance with the 1995 Indenture.

We have assumed that all signatures on documents, certificates, and instruments examined by us are genuine, all documents, certificates, and instruments submitted to us as originals are authentic, and all documents, certificates, and instruments submitted to us as copies conform to the originals. In addition, we have assumed herein that all documents, certificates, and instruments relating to this financing have been duly authorized, executed, and delivered by all parties to them, and we have further assumed the due organization, existence, and powers of all parties.

This opinion is being delivered pursuant to Section 3.07(b)(3) of the Original Master Indenture.

Based on the foregoing, we are of the opinion that the Series 2007 Bonds have been defeased and are no longer outstanding.

This opinion is based on an analysis of existing laws, regulations, rulings and court decisions, and may be adversely affected by actions taken or events occurring, including a change in law, regulation or ruling (or in the application or official interpretation of any law, regulation or ruling) after the date hereof. We have not undertaken to determine, or to inform any person, whether such actions are taken or such events occur and we have no obligation to update this opinion in light of such actions or events. 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.

This opinion is for the benefit of the addressees only and may not be quoted, circulated, assigned or delivered to any other person without our prior written consent.

Very truly yours,

McGuireWoods LLP