FORM OF FINAL OPINION OF BOND COUNSEL

[Letterhead of Quint & Thimmig LLP]

February 27, 2020

City Council of the
City of Tustin
300 Centennial Way
Tustin, California 93654

OPINION: $14,910,000 City of Tustin (Orange County, California) Taxable Water Refunding Revenue Bonds, Series 2020

Members of the City Council:

We have acted as bond counsel in connection with the issuance by the City of Tustin (the "City") of its $14,910,000 Taxable Water Refunding Revenue Bonds, Series 2020 (the "Bonds"), under the provisions of Article 10 of Chapter 3 of Part 1 of Division 2 of Title 5 (commencing with section 53570) of the California Government Code (the "Law"), an Indenture of Trust, dated as of February 1, 2020 (the "Indenture"), by and between the City and The Bank of New York Mellon Trust Company, N.A., as trustee (the "Trustee"), and Resolution No. 20-07, adopted by the City Council of the City on February 4, 2020 (the "Resolution"). 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 City contained in the Resolution and in the Indenture and in the certified proceedings and certifications of public officials and others furnished to us, without undertaking to verify such facts by independent investigation.

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

1. The City is a duly created and validly existing municipal corporation and general law city with the power to enter into the Indenture and to perform the agreements on its part contained therein.

2. The Indenture has been duly authorized, executed and delivered by the City and is valid, binding and enforceable against the City in accordance with its terms.

3. The Bonds constitute valid and binding special obligations of the City payable solely from Net Revenues of the Enterprise (as such terms are defined in the Indenture) and certain other amounts held under the Indenture, as described in the Indenture.

4. Interest on the Bonds is includible in gross income for federal income tax purposes.

5. Interest on the Bonds is exempt from personal income taxation imposed by the State of California.

Ownership of the 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 Bonds.

With respect to the opinions expressed herein, the enforceability of the Indenture is subject to the limitations on the imposition of certain fees and charges by the City related to the Enterprise under Articles XIIIC and XIIID of the California Constitution. In addition, the rights of the owners of the Bonds and the enforceability of the 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.

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,