November 2, 2006

To the Parties Listed in Schedule A

Re: $21,775,000 State of Florida, Board of Governors Florida Atlantic University Dormitory Revenue Refunding Bonds, Series 2006B (the "Bonds")

Ladies and Gentlemen:

I am Associate General Counsel of XL Capital Assurance Inc., a New York corporation (the "Corporation"), and have acted as counsel to the Corporation in connection with the issuance of Financial Guaranty Insurance Policy No. CA03381A (the "Policy") relating to the above-captioned Bonds.

In so acting, I have examined a copy of the Policy and such other relevant documents as I have deemed necessary.

Based upon the foregoing, I am of the following opinion:

1. The Corporation is a stock insurance corporation, duly incorporated and validly existing under the laws of the State of New York and is licensed and authorized to issue the Policy under the laws of the State of New York.

2. The Policy has been duly executed and is a valid and binding obligation of the Corporation enforceable in accordance with its terms except that the enforcement of the Policy may be limited by laws relating to bankruptcy, insolvency, reorganization, moratorium, receivership and other similar laws affecting creditors' rights generally and by general principles of equity (regardless of whether such enforceability is considered in a proceeding in equity or at law).

3. The Policy is not required to be registered under the Securities Act of 1933, as amended.

I am qualified to practice law in the State of New York and do not purport to be an expert on, or to express any opinion concerning, any law other than the laws of the State of New York and the Federal laws of the United States of America.

This opinion is being delivered to you in connection with the issuance of the Policy and may not be relied upon for any other purposes or by any other person without my express written consent.

Very truly yours,

[Signature]
William J. Rizzo
Associate General Counsel
Schedule A

State of Florida, Board of Governors
Tallahassee, Florida

U.S. Bank Trust National Association
New York, New York