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ATTORNEYS AT LAW

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April 21, 2020

**VIA ELECTRONIC DELIVERY**

United States Department of Agriculture  
Rural Development  
300 Ala Moana Blvd.  
Suite1-340  
Honolulu, HI 96850

**Re: Legal Opinion Regarding Pacific Horizons School, Inc.**

Dear Sir or Madam,

Our office has been retained by Pacific Horizons School, Inc., to provide a legal opinion regarding their corporate status and their authority and power to execute and obtain loan and/or grant funds. I have reviewed Pacific Horizon School, Inc.'s Articles of Incorporation, Bylaws and Meeting Minutes of the Pacific Horizon's Board of Director's, as well as, the Certificate of Good Standing issued by the American Samoa Department of Commerce. Based on the review of these documents, I can state with confidence that Pacific Horizons School, Inc. was duly organized under the laws of American Samoa on November 10, 1994. Pacific Horizons School has complied with all corporate formalities and is in Good Standing with the Territory of American Samoa.

Additionally, pursuant to Article 3 Paragraph 2 of the Articles of Incorporation, Pacific Horizons School has the authority and power to "enter into contracts, borrow, and lend money and to secure any of its obligations by mortgage or other encumbrance of any part of its property or income." The Board of Director's for Pacific Horizons School on March 24, 2020, authorized the pursuit and acquisition of a USDA Loan and Grant to advance the educational goals of the school.

Should you have any questions or would like to discuss this matter please do not hesitate to contact me at your earliest convenience. Thank you for your prompt attention to this matter.

Sincerely,



Thomas B. Jones, Esq.  
Managing Attorney  
Jones & Associates, LLC