

December 17, 2020

FMSbonds, Inc.
North Miami Beach, Florida

U.S. Bank National Association, as Trustee
Fort Lauderdale, Florida

\$6,895,000
BANYAN CAY COMMUNITY DEVELOPMENT DISTRICT
SPECIAL ASSESSMENT BONDS, SERIES 2020
(PHASE ONE ASSESSMENT AREA)

Ladies and Gentlemen:

We have acted as Bond Counsel to Banyan Cay Community Development District (the "District"), a community development district established and existing pursuant to Chapter 190 of the Florida Statutes, as amended. We have rendered our final approving opinion (the "Opinion") of even date herewith relating to the District's \$6,895,000 Special Assessment Bonds, Series 2020 (Phase One Assessment Area) (the "Series 2020 Bonds"). In rendering the Opinion we have relied on the general certificate of the District and the opinion of counsel to the District as to certain matters relating to the due authorization and adoption with respect to the resolutions adopted by the District in connection with the Series 2020 Bonds. You may rely on the Opinion as though the Opinion were addressed to you.

Respectfully submitted,

A handwritten signature in blue ink that reads "Greenberg Traurig, P.A." in a cursive script.

GREENBERG TRAUIG, P.A.