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ATTORNEY GENERAL OF TEXAS
GREG ABBOTT

April 26, 2012

THIS IS TO CERTIFY that Fort Bend County, Texas (the "Issuer"), has submitted to me Fort Bend County, Texas Unlimited Tax Road Bond, Series 2012 (the "Bond"), in the principal amount of \$58,220,000, for approval. The Bond is dated April 1, 2012, numbered IB-1, and was authorized by an Order of the Issuer passed on April 3, 2012 (the "Order").

I have examined the law and such certified proceedings and other papers as I deem necessary to render this opinion.

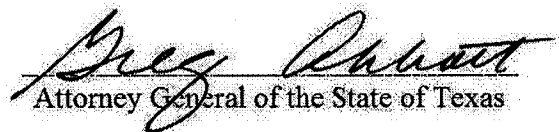
As to questions of fact material to my opinion, I have relied upon representations of the Issuer contained in the certified proceedings and other certifications of public officials furnished to me without undertaking to verify the same by independent investigation.

I express no opinion relating to the official statement or any other offering material relating to the Bond.

Based on my examination, I am of the opinion, as of the date hereof and under existing law, as follows:

- (1) The Bond has been issued in accordance with law and is a valid and binding obligation of the Issuer.
- (2) The Bond is payable from the proceeds of an ad valorem tax levied, without legal limit as to rate or amount, against all taxable property in the Issuer.

Therefore, the Bond is approved.


Attorney General of the State of Texas

No. 53585
Book No. 2012-B
JCH

OFFICE OF COMPTROLLER

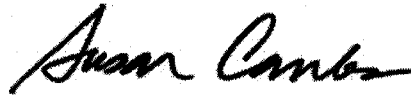
OF THE STATE OF TEXAS

I, SUSAN COMBS, Comptroller of Public Accounts of the State of Texas, do hereby certify that the attachment is a true and correct copy of the opinion of the Attorney General approving the:

Fort Bend County, Texas Unlimited Tax Road Bond, Series 2012

numbered IB-1, of the denomination of \$ 58,220,000, dated April 1, 2012, as authorized by issuer, interest various percent, under and by authority of which said bonds/certificates were registered electronically in the office of the Comptroller, on the 26th day of April, 2012, under Registration Number 79976.

Given under my hand and seal of office, at Austin, Texas, the 26th day of April, 2012.




SUSAN COMBS
Comptroller of Public Accounts
of the State of Texas

OFFICE OF COMPTROLLER
OF THE STATE OF TEXAS

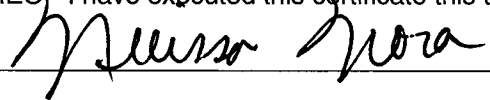
I, Melissa Mora, Bond Clerk Assistant Bond Clerk in the office of the Comptroller of the State of Texas, do hereby certify that, acting under the direction and authority of the Comptroller on the 26th day of April, 2012, I signed the name of the Comptroller to the certificate of registration endorsed upon the:

Fort Bend County, Texas Unlimited Tax Road Bond, Series 2012,

numbered IB-1, dated April 1, 2012, and that in signing the certificate of registration I used the following signature:

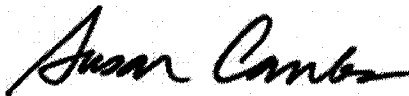


IN WITNESS WHEREOF I have executed this certificate this the 26th day of April, 2012.



I, Susan Combs, Comptroller of Public Accounts of the State of Texas, certify that the person who has signed the above certificate was duly designated and appointed by me under authority vested in me by Chapter 403, Subchapter H, Government Code, with authority to sign my name to all certificates of registration, and/or cancellation of bonds required by law to be registered and/or cancelled by me, and was acting as such on the date first mentioned in this certificate, and that the bonds/certificates described in this certificate have been duly registered in the office of the Comptroller, under Registration Number 79976.

GIVEN under my hand and seal of office at Austin, Texas, this the 26th day of April, 2012.



SUSAN COMBS
Comptroller of Public Accounts
of the State of Texas