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ATTORNEY GENERAL OF TEXAS
GREG ABBOTT

April 1, 2014

THIS IS TO CERTIFY that Fort Bend County, Texas (the "Issuer"), has submitted the Fort Bend County, Texas Unlimited Tax Road Refunding Bond, Series 2014 (the "Bond") in the principal amount of \$18,900,000 for approval. The Bond is dated April 1, 2014, numbered IB-1, and was authorized by an Order of the Issuer passed on March 4, 2014.

The Office of the Attorney General has 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 Issuer contained in the certified proceedings and other certifications of public officials furnished to us without undertaking to verify the same by independent investigation.

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

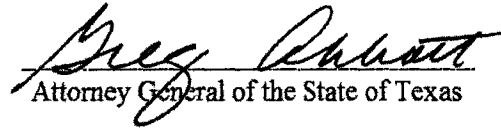
Based on our examination, we are of the opinion, as of the date hereof and under existing law, as follows:

- (1) The Bond has been issued in accordance with law and is a valid and binding obligation of the Issuer.
- (2) In accordance with the provisions of the law, including an Escrow Agreement dated as of March 4, 2014, firm banking arrangements have been made for the discharge and final payment or redemption of the obligations being refunded upon deposit of an amount sufficient to pay said obligations when due.
- (3) The Bond is payable from the proceeds of an annual ad valorem tax levied, without limit as to rate or amount, against all taxable property in the Issuer.

Therefore, the Bond is approved.

The Comptroller is instructed that she may register the Bond without the cancellation of the underlying obligations being refunded thereby.

No. 56748
Book No. 2014-A
MA


Attorney General of the State of Texas

*See attached Signature Authorization


OFFICE OF THE ATTORNEY GENERAL
OF THE STATE OF TEXAS

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I, GREG ABBOTT, Attorney General for the State of Texas, do hereby authorize the employees of the Public Finance Division of the Office of the Attorney General to affix a digital image of my signature, in my capacity as Attorney General, to the opinions issued by this office approving the issuance of public securities by the various public agencies, non-profit corporations, districts, entities, bodies politic or corporate, or political subdivisions of this State as required by law, the opinions approving those contracts designated by the Legislature as requiring the approval of the Attorney General, and the obligations, proceedings and credit agreements required by law to be approved by the Attorney General. The authorized digital image of my signature is attached as Exhibit A and is hereby adopted as my own for the purposes set forth herein. This supercedes any prior signature authorizations for the same purpose.

The authority granted herein is to be exercised on those occasions when I am unavailable to personally sign said opinions, and upon the condition that the opinions to which the digital image signature is affixed have been approved by an authorized Assistant Attorney General following the completion of the Public Finance Division's review of the transcripts of proceedings to which the opinions relate.

Given under my hand and seal of office at Austin, Texas, this the 9 day of January, 2009.



GREG ABBOTT
Attorney General of the State of Texas

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 Refunding Bond, Series 2014

numbered IB-1, of the denomination of \$ 18,900,000, dated April 1, 2014, 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 1st day of April 2014, under Registration Number 83164.

Given under my hand and seal of office, at Austin, Texas, the 1st day of April 2014.

A handwritten signature in black ink, appearing to read "Susan Combs", with a stylized, cursive script.

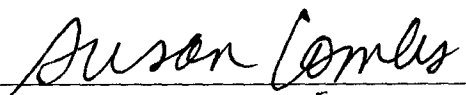
SUSAN COMBS
Comptroller of Public Accounts
of the State of Texas

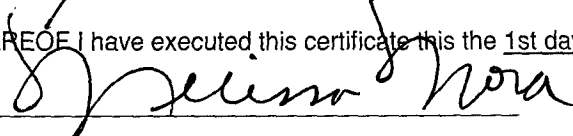
OFFICE OF COMPTROLLER
OF THE STATE OF TEXAS

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 1st day of April 2014, I signed the name of the Comptroller to the certificate of registration endorsed upon the:

Fort Bend County, Texas Unlimited Tax Road Refunding Bond, Series 2014,


numbered IB-1, dated April 1, 2014, and that in signing the certificate of registration I used the following signature:



IN WITNESS WHEREOF I have executed this certificate this the 1st day of April 2014.


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 83164.

GIVEN under my hand and seal of office at Austin, Texas, this the 1st day of April 2014.


SUSAN COMBS
Comptroller of Public Accounts
of the State of Texas