



KEN PAXTON
ATTORNEY GENERAL OF TEXAS

June 3, 2016

THIS IS TO CERTIFY that Fort Bend County, Texas (the "Issuer"), has submitted the Fort Bend County, Texas Limited Tax and Refunding Bond, Series 2016B (the "Bond") in the principal amount of \$94,420,000 for approval. The Bond is dated June 1, 2016, numbered IB-1, and was authorized by an Order of the Issuer passed on May 10, 2016.

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 May 10, 2016, 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, within the limits prescribed by law, against all taxable property in the Issuer.

Therefore, the Bond is approved.

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

No. 60978
Book No. 2016-B
MA

*See attached Signature Authorization

A handwritten signature in black ink, reading "Ken Paxton", is written over a horizontal line.
Attorney General of the State of Texas

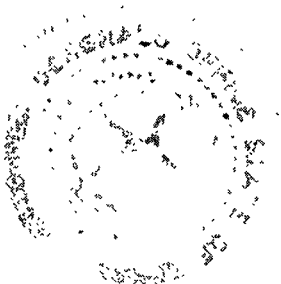
OFFICE OF THE ATTORNEY GENERAL
OF THE STATE OF TEXAS

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I, KEN PAXTON, 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, district, 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 supersedes 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 5th day of January, 2015.



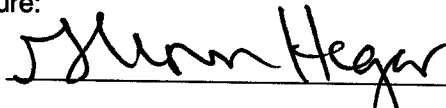

KEN PAXTON
Attorney General of the State of Texas

OFFICE OF COMPTROLLER
OF THE STATE OF TEXAS

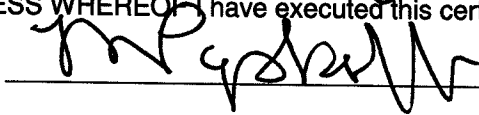
I, Melissa Popkoff, ☐ Bond Clerk ☒ Assistant Bond Clerk in the office of the Comptroller of the State of Texas, do hereby certify that, acting under the direction and authority of the Comptroller on the 3rd day of June 2016, I signed the name of the Comptroller to the certificate of registration endorsed upon the:

Fort Bend County, Texas Limited Tax and Refunding Bond, Series 2016B,

numbered IB-1, dated June 1, 2016, and that in signing the certificate of registration I used the following signature:



IN WITNESS WHEREOF I have executed this certificate this the 3rd day of June 2016.



I, Glenn Hegar, 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 87138.

GIVEN under my hand and seal of office at Austin, Texas, this the 3rd day of June 2016.



GLENN HEGAR
Comptroller of Public Accounts
of the State of Texas

OFFICE OF COMPTROLLER

OF THE STATE OF TEXAS

I, GLENN HEGAR, 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 Limited Tax and Refunding Bond, Series 2016B

numbered IB-1, of the denomination of \$ 94,420,000, dated June 1, 2016, 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 3rd day of June 2016, under Registration Number 87138.

Given under my hand and seal of office, at Austin, Texas, the 3rd day of June 2016.

A handwritten signature in black ink, appearing to read "Glenn Hagar", with a stylized flourish at the end.

GLENN HEGAR
Comptroller of Public Accounts
of the State of Texas