



KEN PAXTON
ATTORNEY GENERAL OF TEXAS

October 31, 2017

THIS IS TO CERTIFY that Fort Bend County, Texas (the "Issuer"), has submitted the Fort Bend County, Texas Tax and Revenue Certificate of Obligation, Taxable Series 2017B (QECB) (the "Certificate") in the principal amount of \$4,952,549 for approval. The Certificate is dated October 31, 2017, numbered IB-1, and was authorized by an Order of the Issuer passed on October 3, 2017 (the "Order").

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.

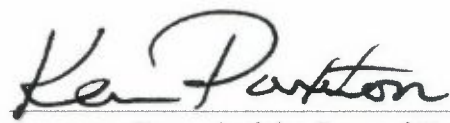
As to questions of fact material to our opinion, we have relied upon representations of the Issuer contained in the certified proceedings and other certifications of public officials furnished to us without undertaking to verify the same by independent investigation.

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

Based on our examination, we are of the opinion, as of the date hereof and under existing law, as follows (capitalized terms, except as herein defined, have the meanings given to them in the Order):

- (1) The Certificate has been issued in accordance with law and is a valid and binding obligation of the Issuer.
- (2) The Certificate is payable from the proceeds of an ad valorem tax levied, within the limits prescribed by law, upon all taxable property within the Issuer and is further payable from and secured by a lien on the Net Revenues of the Issuer's park system, as provided in the Order.

Therefore, the Certificate is approved.


Attorney General of the State of Texas

No. 63562
Book No. 2017-D
MA

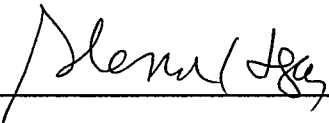
*See attached Signature Authorization

OFFICE OF COMPTROLLER
OF THE STATE OF TEXAS

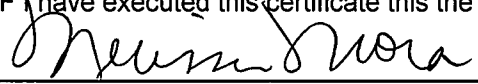
I, Melissa Mora, Bond Clerk Assistant Bond Clerk in the office of the Comptroller of the State of Texas, do hereby certify that, acting under the direction and authority of the Comptroller on the 31st day of October 2017, I signed the name of the Comptroller to the certificate of registration endorsed upon the:

Fort Bend County, Texas Tax and Revenue Certificate of Obligation, Taxable Series 2017B (QECB),

numbered IB-1, dated October 31, 2017, and that in signing the certificate of registration I used the following signature:



IN WITNESS WHEREOF I have executed this certificate this the 31st day of October 2017.



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 89705.

GIVEN under my hand and seal of office at Austin, Texas, this the 31st day of October 2017.



GLENN HEGAR
Comptroller of Public Accounts
of the State of Texas

OFFICE OF COMPTROLLER

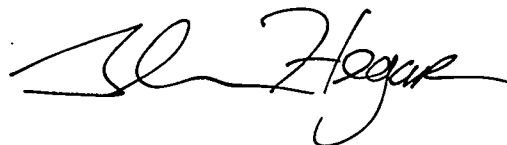
OF THE STATE OF TEXAS

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 Tax and Revenue Certificate of Obligation, Taxable Series 2017B (QECB)

numbered IB-1, of the denomination of \$ 4,952,549, dated October 31, 2017, as authorized by issuer, interest 3.594 percent, under and by authority of which said bonds/certificates were registered electronically in the office of the Comptroller, on the 31st day of October 2017, under Registration Number 89705.

Given under my hand and seal of office, at Austin, Texas, the 31st day of October 2017.

A handwritten signature in black ink, appearing to read "Glenn Hegar", written in a cursive style.

GLENN HEGAR
Comptroller of Public Accounts
of the State of Texas