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December 11, 2014

Hidalgo County Urban County Program
Attn: Diana R. Serna, Director
427 E. Duranta Avenue, Ste. 107
Alamo, Texas 78516

Via Email
& United States Regular Mail

RE: Request by Hidalgo County's Urban County Program for Exception to Conflict of Interest Regulation, 24 C.F.R. § 92.356 re: Ms. Felicidad Garcia

Ladies and Gentlemen:

This opinion is being rendered pursuant to 24 C.F.R. § 92.356(d)(2) and at the request of the Hidalgo County Urban County Program ("UCP") relating to its request of the Department of Housing and Urban Development of the United States to grant UCP an exception to the provisions of paragraph (b) of 24 C.F.R. §570.611 for the application of Ms. Felicidad Garcia. According to the information UCP provided, Ms. Felicidad Garcia is applying for a HOME loan. UCP has stated that Ms. Felicidad Garcia's son is employed by UCP as a Finance Clerk II.

In connection with the foregoing we have reviewed the Chapter 171 of the Texas Local Government Code and Chapters 572 of the Texas Government Code, copies of the conflict of interest provisions of the HOME Program Conflict of Interest policy, and the Owner-Occupied Rehabilitation Program policy, have verified with Mr. Valde Guerra, Chief Executive Officer of Hidalgo County, that Hidalgo County has no conflict of interest policies other than Chapters 171 and 176 of the Texas Local Government Code (which the Hidalgo County Commissioners Court has not been extended to employees) and have examined written correspondence from UCP and such other instruments and documents which we have deemed necessary or advisable to examine for the purpose of this opinion. With respect to such examination, we have assumed that the statements of fact made by UCP in all such documents and instruments are true, accurate and complete.

Based on the foregoing, and having due regard for such legal considerations as we deem relevant, and subject to the limitations and assumptions set forth herein, including without limitation the matters set forth in the last two (2) paragraphs hereof, we are of the opinion that:

1. To the best of our knowledge, the approval of the application of Ms. Felicidad Garcia for a HOME loan would not violate Texas state or local laws.

In rendering the opinion, we have assumed (i) the due authorization, execution and delivery by all parties of all documents that we have examined, (ii) the genuineness of all signatures on conformed copies, (iv) the legal capacity of natural persons, (v) the conformity to authentic original documents of all documents submitted to us as copies, (vi) the enforceability of all documents against all parties thereto other than the County and (vi) the validating of all information furnished to us by UCP.

The opinions expressed herein are subject to the following limitations, qualifications, assumptions and exceptions.

We are furnishing this letter solely for your benefit at your request. This opinion is not to be used, circulated, quoted or otherwise referred to for any other purpose, nor is it to be relied upon by any other person or entity or by UCP in any other context without our express written consent.

This opinion is based on and is limited to the laws of the State of Texas, and the federal laws of the United States of America. Insofar as the foregoing opinion relates to matters of law other than the foregoing, no opinion is hereby given.

This opinion is as of the date hereof, and we undertake no obligation to supplement the opinions set forth herein as facts and circumstances come to our attention or changes in the law occur which could affect such opinions.

Very truly yours,

A handwritten signature in black ink that reads "Atlas Hall & Rodriguez LLP". The signature is written in a cursive, slightly slanted style.

ATLAS, HALL & RODRIGUEZ, LLP