

Bills Notes, Bonds and Choses in action seen. Mr. West, eye, and whole not seen. Mr. West says a large amount is, supposed to be about \$200,000.00 & \$100,000.00 which belonged to the said Benjamin Todd in his life time. That said Rachel W. Todd set into his possession said Bonds, Notes & Choses in action and other securities of the Decedent, under the Sentence of holding and taking good care of them for his self and family but he when in possession got the possession of said Bonds, Notes & Choses in action &c; by fraud and deception for the express purpose of cheating your Oratrix out of her Marital rights which justly belonged to her as the lawful wife of the said Benjamin Todd and said Rachel W. Todd to accomplish his wicked and fraudulent purposes unknown to your Oratrix at that time to injure and defraud her out of her just rights by poisoning and prejudicing the mind of the said Benjamin Todd against your Oratrix his lawful wife, by fraud and falsehood and other arts and devices.

Your Oratrix and Orator further charge, that the said Rachel W. Todd held in his possession, so fraudulently obtained, all the said Government Bonds single Bills Notes and Choses in action at the time of the death of the said Benjamin Todd which he held and claimed against the legal Representatives of the said Decedent and refused to deliver them to the legal representatives of the said Decedent and refused to deliver them to the legal Representatives of the said Benjamin Todd Decedent for distribution &c; and he the said Rachel W. Todd fraudulently, deceitfully and falsely pretended, and now pretends to hold and claim said Bonds single Bills Notes and Choses in action as a gift to him by his sick wife and to wit Rachel W. Todd which pretended fraudulent gift was made but a few days before the death of the said Benj. Todd, and while he was weak both in body and mind and incapable of making any valid deed or contract and that said pretended gift is utterly void and voidable.

And Your Oratrix and Orator further charge that the said Rachel W. Todd a few days or more soon after the death of Benj. Todd further to cheat and defraud your Oratrix clandestinely and fraudulently escaped from and left the State of Maryland to evade the Sheriff who had legal process against him issued by virtue of an Order of the Hon. John C. Smith Judge of the Circuit Court for Carroll County, as a Court of Equity and the said Rachel W. escaped and fled into the State of Illinois taking with him all the said United States or Government Bonds of different denominations which he obtained from the said Benjamin Todd in his life time and fraudulently held after his death against the legal Representatives of the said Decedent amounting in the whole to fifty five thousand Dollars or more and continues to evade the legal process of Law in this State and keeps and holds said Bonds and neglects and refuses to give them up to the legal Representatives of the said Decedent.

Your Oratrix and Orator further charge that the said Rachel W. Todd further to carry into effect and to accomplish his wicked and fraudulent designs and schemes to cheat and defraud your Oratrix when he escaped into the State of Illinois and clandestinely left this State to evade legal process, he placed in the hands of Mr. J. P. Esq, the notes single Bills Choses in action (other than the United States or Government Bonds) for collection for himself and for his own use and the said William J. Esq, as the attorney of the said Rachel W. now holds said Bonds, Notes, single Bills and Choses in action and refuses to give them up to the legal representatives of the said Decedent Benj. Todd.

Your Oratrix and Orator further charge that the said Rachel W. Todd