

not only designed, and attempted to cheat, and defraud your Oratrix out of her rights in the Money due on the United States or Government Bonds &c, other Bonds Single Bills Notes and Notes in action as the Widow of the said Deceased, He dying intestate not leaving any lawful children or the descendants of any lawful children; but the said Rachel W. Todd but a very few days before the death of the said Benjamin Todd by his fraudulent and deceitful conduct and practices, and his false statements and promises operated upon the weak and feeble mind of his said brother Benj. Todd induced him to make a voluntary Deed of Conveyance of thirteen Hundred and Eighteen Acres one Acre and twelve Perches of his Land and Real Estate, to Benjamin Hammond Todd and Jesse Edwin Todd the children of an illegitimate son of the said Benj. Todd decd, who could not inherit any of the Real Estate of the said Benj. Todd decd, a true and Certified Copy of said voluntary Deed of Conveyance is here exhibited marked Exhibit No. 1, which together with all other Exhibits your Oratrix and Orator pray may be taken and considered as a part of this Bill of Complaint, that the said grantors, Benj. Hammond Todd and Jesse Edwin Todd are Infants under the age of twenty one years; that the Deed of Conveyance of which Exhibit No. 1, is a Copy, was acknowledged before H. W. Phelps, a Justice of the Peace of Frederick County and the Parties purporting to be the grantors in the Deed, appeared before the said Justice of the Peace in Council Chamber at the residence of the then Benj. Todd, and your Oratrix his wife where said acknowledgment was made and taken by the said Justice, which voluntary Deed of Conveyance your Oratrix is advised, is utterly null and void, so far as her rights are concerned, for that your Oratrix was induced by fraud falsehood and deception, practiced upon her by said Rachel W. Todd who was constantly about his said brother's sick bed, personing and prejudicing his mind against your Oratrix as his lawful wife for the purpose of depriving her after death of her said Husband of all her Marital Rights in his Real and Personal Estate.

Your Oratrix further expressly charges that she was induced and persuaded to execute and acknowledge said Deed of Conveyance jointly with her said Husband Benj. Todd by the fraud and falsehood of the said Rachel W. Todd and the said Benj. Todd her said Husband, they both before and at the time that your Oratrix executed and acknowledged said Deed to consummate their fraudulent purpose pledged themselves promised and assured her that if she would join in said Deed of Conveyance, that she should have in lieu of dower in said Real Estate so conveyed the United States or Government Bonds which he the said Benjamin Todd owned and held at the time said Deed was made and executed, amounting to nearly Forty Thousand dollars and that she should also have other notes, single Bills and Chosen in action due and owing to him her said Husband at the time of the giving said Deed from sundry persons in Frederick County and Howard Counties, your Oratrix believing that the said Benj. Todd her Husband, and the said Rachel W. Todd, were true in the pledges and assurances, and not suspecting their fraudulent and wicked designs she executed and acknowledged said Deed.

Your Oratrix, to her great surprise after the death of her said Husband found that the said Rachel W. Todd had fraudulently got into his possession all the United States or Government Bonds and all the notes single Bills and Chosen in action of the said Benj. Todd which he owned and held in his life time all amounting to more than Fifty Thousand dollars, which he pretends to hold and claim as a gift from said Benj. Todd when in truth and in fact he obtained them and got them into his possession by fraud and falsehood, and but a short time after the death of said Benj. Todd the said Rachel W. Todd absconded and left the State, and went to the State of