

Whenever the holder of Sterling Coupons is willing to receive payment in this Country you would of course be authorized (if the interest of the State would be thereby promoted) to pay him at the Loan Office at the rate of $\$44 \frac{44}{100}$ for the pounds Sterling. But I think you are obliged under the law to pay in London all holders of Sterling Coupons whose assent you cannot obtain to be paid in this Country, as it is I think clear that in estimating the amount to be remitted to pay the holders of Sterling Coupons who do not assent to be paid at the Loan Office, you are not to compute the pounds Sterling at $\$44 \frac{44}{100}$ but at such rate as you would compute the pounds Sterling without reference to the act of 1842 Ch. 189. This subject is one of great importance not so much in view of the amount now involved as in principle, and I should therefore prefer that instead of being governed by the opinion expressed by me you would lay this letter before the Attorney General that he may examine the question & furnish me with his written opinion.

respt &c Thos G. Pratt

George R. Richardson Esq
Attorney General

State Department
September 16th 1845

Sir

The Treasurer has received a letter from Col. Hughtlett the Collector of the State Tax for Talbot County enquiring whether as Collector for the year 1845 he is authorized & required to collect the tax of 1842. The determination of this question depends upon the construction of the 14th section of the act of 1843 Chap 208 and of the 12th section of the act of 1844 Chap 236. The Treasurer thinks that the 12th section of the act of 1844 applies only to the Counties in which the taxes for each of the years 1841, 2, 3 & 4 remain uncollected and that this section does not consequently apply to Talbot County, in which the tax of 1841 has been collected. If he is right in this construction of the 12th section of the act of 1844 it seems to me that he is right in supposing that the tax of 1842 (in Counties in which the tax of 1841 has been collected) is to be collected in conformity with the provisions of the 14th section of the Act of 1843 and that it will be the duty of the Collector for Talbot County (the tax of 1841 having been paid) to collect the tax of 1842 with the tax for 1845.

Be pleased to examine the sections of the Laws referred to and give me by return Mail your opinion upon the question whether Col. Hughtlett is bound to collect the tax of 1842 with the tax of 1845. I wish you would see Mr. Gettings in reference to the notice which he has published in regard to the receipt of Coupons of 1845 in payment of taxes. It appears to me that the tables or scales which he has adopted is wrong.

He says that coupons or certificates amounting to \$16 will only be received for $\$12 \frac{52}{100}$. Now the law is not retrospective and I think that the only deduction which can be made