One thousand seven hundred and eighty four did bargain and sell by Deed of bargain and Sale for a Consideration therein mentioned two undivided thirds parts of the said tract called Bands Marsh Resurveyed to Samuel Purviance and Robert Purviance both of Baltimore County Gentlemen, as may more fully appear. Recourse being had to the said Deed which the said Attorney General prays may be taken as part of this his information

The said Attorney General at and by the Relation afore said further Informeth your Honor — that altho the said Nathaniel Smith by his afore said Petition did allerge and setforth that he had Discovered vacant Land Adjoining the said tract called Bands Marsh there was not any Vacant Land adjoining or contiguous to the same but that the whole which by the said Grant is Granted to the said Nathaniel as Vacant Land Added to the Original tract afore said now is and at the time of Obtaining his the said Nathaniels said Warrant and of Obtaining his said Grant was part of the Waters of the North West branch of Patapsco River The Attorney General afore said. by and at the Relation afore said do further inform your Honor that the whole Extent and Comprehension of the said tract called Bands Marsh Resurveyed And every part thereof contained within its boundaries do lie and are situate within two miles of Baltimore Town. and that the Survey of the said tract called Bands Marsh Resurveyed was made contrary to the Law of the State and the Express terms of the said warrant and the Grant thereof was Obtained from the State by fraud misrepresentation and in deceit of the said State. And the said Attorney General at and by the Relation afore said do further Inform your Honor that there was an Agreement entered into by and between the said Nathaniel Smith and the said Samuel Purviance and Robert Purviance before the said Nathaniel Obtained his said Warrant of Resurvey that the said Samuel and Robert should be two thirds Interested with him in the said Survey and should be at a certain share of the Expence and that the said Survey was made and the said Grant Obtained by the said Nathaniel for the joint benefit and use of them the said Nathaniel Smith. Robert and Samuel Purviance and also that the said Robert and Samuel at the time when the same Warrant was procured and when the said Grant was Obtained and when the said Conveyance was made to them by the said Nathaniel and at each and every of those times did well know that the pretended vacancy discovered and Included was not Land but part of the Waters of the North West branch of Patapsco River and the whole lay within two miles of Baltimore Town in Baltimore County and were partners with the said Nathaniel — in the said fraud Misrepresentation and Deceit by which the same Grant was Obtained —

But now sorr is, May it please your Honor — that the said Nathaniel Robert and Samuel Combining and Confederating with divers other persons, to the said Attorney General as yet unknown whose names when Discovered he prays may be Inserted in this Information with apt words to charge them to injure and prejudice The said State of Maryland and the said Thomas Gates the Relator under pretence that the said Grant of Bonds Marsh was fairly and Honestly Obtained do claim all the Waters of the said branch of Patapsco comprised within the Lines of the said Survey as their Sole and Exclusive property and have actually forbid the said Thomas from making and Extending the said wharves by him the said Thomas begun into the waters of the said branch of Patapsco within the Limits of the said Resurvey by the said Nathaniel made as afore said notwithstanding the said permission of the said board of wardens. and have driven a way the Workmen of the said Thomas and Obliged them to Desist from making and Extending the said wharves giving out in Speeches that if they persist therein they the said Nathaniel, Robert and Samuel will Vex, disturb and Oppress the said Thomas and his said Workmen with Suits to Obtain Damages, and that they the said Nathaniel, Robert and Samuel the said wharves (if made by the said Thomas) will seize upon hold and possess for their own use as lying within the Lines of the said Grant All which Actings and Doings of them the said Nathaniel, Robert and Samuel and their Confederates are contrary to Equity and good Conscience and to the manifest injury and prejudice of the said State of the said Relator In tender Consideration Whereof and for as much as the said State and the said Thomas Gates are only properly Releivable in this Honorable Court where frauds of this nature are properly Cognizable and grants Obtained by frauds misrepresentation and Deceit are usually Vacated To the End therefore that the said Nathaniel Robert and Samuel and their Confederates when Discovered may on their Corporal Oaths true and perfect answer make