

The principles thus stated, when applied to your inquiry, and considered in connection with sections 2980 and 2981 G. C. as to the appointment of deputies and assistants in the county surveyor's office, result in the conclusion that no part of the services of the engineering, inspection or superintendence rendered by the county surveyor or any of his regularly employed assistants is to be included in the cost of the work for assessment purposes. If, however, the surveyor finds it necessary to provide for and procure inspectors and superintendents for the special purpose of carrying out a particular sidewalk improvement, the expense thus incurred may be charged to the project and included as an item of the cost to be apportioned between county (or township) and property owners.

Respectfully,
 JOHN G. PRICE,
Attorney-General.

3740.

TAXES AND TAXATION—ACCRUED INTEREST IN UNITED STATES
 GOVERNMENT BONDS IS NOT TAXABLE AS A CREDIT.

Accrued interest on United States Government Bonds is not taxable as a credit.

COLUMBUS, OHIO, November 20, 1922.

Tax Commission of Ohio, Columbus, Ohio.

GENTLEMEN:—The Commission has requested the advice of this department upon an inquiry raised by the Auditor of Cuyahoga County. The question is as to whether accrued interest due on United States Government Bonds is taxable as a credit.

In the opinion of this department the obligation of the United States to pay the interest springs from the same source as that by which it is bound to pay the principal. This department is unable to conceive of any rule of law which can be brought to the support of the claim that immunity from state taxation attaches to the right to receive the principal at maturity (which is the substance of the property represented by the bond itself) but does not attach to the right to receive the interest at the stipulated rate whether that right is evidenced by severable coupons or not.

The Commission is accordingly advised that accrued interest on United States Government Bonds is not taxable.

Respectfully,
 JOHN G. PRICE,
Attorney-General.