

that the stock of said Bridge Company was not taxable and no further action was taken in said case.

Section 2 of Article XII of the Constitution provides:

“Corporations may be formed under general laws; but all such laws may from time to time be altered or repealed.”

A railroad corporation may be created by filing articles of incorporation and organization under the general corporation statutes of this state, and if the corporation has been so created and has thereafter by purchase or merger acquired the properties of another corporation located in a state outside of Ohio, I do not understand that the first corporation would for that reason be considered any the less an Ohio corporation within the meaning of Section 192 of the General Code, or otherwise. Nor do I understand that a railroad company formed by consolidation of two or more existing railroad companies incorporated under the laws of this state would be considered any the less an Ohio corporation than if it had filed articles of incorporation and had organized pursuant to the general incorporation statutes.

Your question is general and as the opinion of 1917, to which you refer, thoroughly discusses and considers the various cases applicable and answers your question, I deem it unnecessary to discuss the cases and principles therein enumerated.

I agree with the reasoning and conclusions of the opinion reported in Opinions, Attorney General, 1917, page 542, and it is my opinion that a company formed by the consolidation of an Ohio corporation with a company of another state is an Ohio corporation within the meaning of Section 192, General Code, and that the shares of stock of such company are exempt from taxation in this state under such section, which provides that no person shall be required to list for taxation a share of the capital stock of an Ohio corporation.

Respectfully,  
EDWARD C. TURNER,  
*Attorney General.*

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1249.

APPROVAL, BONDS OF CENTER TOWNSHIP RURAL SCHOOL DISTRICT, MERCER COUNTY—\$83,500.00.

COLUMBUS, OHIO, November 9, 1927.

*Retirement Board, State Teachers' Retirement System, Columbus, Ohio.*

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1250.

APPROVAL, BONDS OF THE VILLAGE OF WEST UNION, ADAMS COUNTY—\$2,700.00.

COLUMBUS, OHIO, November 9, 1927.

*Industrial Commission of Ohio, Columbus, Ohio.*