

practice of criminals, and is habitually resorted to by the promoters of sporadic business ventures which are criminal or on the verge of criminality. This practice is of course wholly vicious, is adopted in aid of an illegal enterprise and is frequently an important element in its success. But it is not altogether clear how it can be prevented. Change of name without prescribed formalities may be made a criminal offense, but nine times out of ten the project in aid of which the change is made is itself criminal, and the adding of one more penalty will avail nothing; certainly it will not deter the burglar or "con man" with a long record of felonies behind him from taking a new alias at the scene of each new crime. Nothing short of the establishment of a complete system of personal identification records and passports such as obtains in some parts of Europe would check this class of name changing. While such a system might be in many ways advantageous, as for example in putting some check on the criminal tramp, nothing is more certain than that it cannot be adopted or enforced at the present time.—*Law Notes.*

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In the report of a case in the official reports of a certain Province of the Dominion appears a judgment, dated February 24th, 1919, which begins as follows: "The accused, in the month of June last, was found guilty by the jury of having committed a robbery at the — Branch of the Royal Bank, together with one L—, being armed with an offensive weapon, *the late Chief Justice presiding.*" This being evidently an official robbery, having the sanction of the Court, presumably no punishment was inflicted; but have our Judges time to preside at such functions?

The above reminds us of a saying of a brilliant and witty Chief Justice of Ontario of long ago. He had a strong aversion to Courts of Equity, contrasting them unfavourably with those of the common law. There was in those days much unnecessary circumlocution and red tape, for example, in obtaining an order to get money out of the Court of Chancery. A robbery had recently been committed by one of the officials of the Court at Osgoode Hall, who decamped with a large sum of Court money. "Ah" said the Chief Justice, "Mr. R. (the absconder) has introduced a new practice in his Court which is eminently simple, and really the only possible way of obtaining justice in that Court."