

"charitable objects" among which "the advancement of religion" is included, see 9 Edw. VII., c. 58, s. 2 (2), but it does not, that we can see, enable any "religious society or congregation of Christians" to hold lands for other than "charitable purposes." On the contrary it expressly prohibits any corporation (and most religious societies are corporations) except by license of the Crown, from acquiring any land whatever, under penalty of its forfeiture to the Crown.

There are many objects for which a grant of land might be made whereby a religious society or congregation of Christians might be benefited, which would not be charitable, *e.g.*, for the payment of a debt: *Stewart v. Gesner*, 29 Gr. 629; *Smith v. Methodist Church*, 16 Ont. 199, or the superannuation of ministers: *Smith v. Methodist Church*, *supra*, or by way of endowment, see *Sills v. Warner*, 27 Ont. 266, etc., but we should fear that gifts of land to any religious society or congregation of Christians for any such purpose, not "charitable" would now be void unless the donees held a license from the Crown, or special statutory powers to hold and acquire land for such other objects.

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#### THE INTERNATIONAL REGULATION OF OCEAN TRAVEL.

The Senate of the United States has just adopted the following resolution: "Resolved, that the President of the United States be, and he is hereby, advised that the Senate would favour treaties with England, France, Germany, and other maritime governments, to regulate the course and speed of all vessels engaged in the carrying of passengers at sea, to determine the number of lifeboats, rafts, searchlights, and wireless apparatus to be carried by such vessels, and to assure the use of such other equipment as shall be adequate to secure the safety of such vessels, passengers, and crews."

This resolution naturally attracts the attention of those interested in the study of International Law.