

motive of the prisoner, yet he could not properly as the result of such inquiry inflict a heavier sentence on the ground that it thereby appeared that the accused had committed a more serious offence than that for which he was indicted, and to which he had pleaded guilty.

ALIEN—SON BORN ABROAD OF NATURALIZED PARENT—RESIDENCE OF INFANT SON WITH WIDOWED MOTHER IN ENGLAND—NO GRANT OF CERTIFICATE OF NATURALIZATION TO MOTHER—NATURALIZATION ACT 1870 (33 VICT., c. 14) s. 10.

*Jaffé v. Keel* (1916) 2 K.B. 476. This was a case stated by Justices. Jaffé was charged with not having registered, being an alien enemy. The facts being that his father, who was a German, became naturalized under the Aliens Act 1844; he was married at that time to a German woman. In 1856 the father was sent from England to Germany as a missionary to Jews, and died in Germany in 1887. His widow in 1875 returned to England with the appellant, who was born in Germany, and had remained in England ever since and claimed to be a British subject. A Divisional Court (Darling, Avory & Horridge, JJ.) held that even assuming the appellant's father had, by his naturalization in 1844, become entitled to the privileges of the Naturalization Act of 1870, the appellant did not obtain the status of a British subject under s. 10, sub. s. 5 of the Act of 1870, which provides that "where the father or the mother being a widow has obtained a certificate of naturalization in the United Kingdom every child of such father or mother who during infancy has become resident with such father or mother in any part of the United Kingdom shall be deemed to be a naturalized British subject," because his mother, although entitled to the privileges of a British subject by virtue of her husband's naturalization, did not herself obtain a certificate of naturalization in the United Kingdom.

INSURANCE, LIFE—POLICY ON LIFE OF ANOTHER—ABSENCE OF INSURABLE INTEREST—CONTRACT INDUCED BY FRAUD—RECOVERY OF PREMIUMS PAID—LIFE INSURANCE ACT 1774 (14 Geo. III. c. 48) s. 1—(R.S.O. c. 183 s. 169).

*Hughes v. Liverpool Victoria Legal Friendly Society* (1916) 2 K.B. 482. This was an action to recover premiums paid on a void policy in the following circumstances. In 1908 and 1909 one Thomas effected with the defendants five policies of insurance