

Audette, J.]

BURM v. THE KING.

[March 28.

*Revenue—Customs—Smuggling—Goods belonging to another seized along with smuggler's property—Release.*

Upon an application from the decision of the Minister of Customs, under sec. 179 of the Customs Act, confirming the seizure of certain jewelry smuggled by the claimant through the Customs at the port of Montreal, it was shewn that four of the articles seized were part of the personal belongings of the claimant's wife, having been given to her by her father as a wedding present and entrusted to the husband for safekeeping merely.

*Held*, that, in view of the provisions of sec. 180 of the Customs Act, requiring the court to decide "according to the right of the matter," such of the smuggled articles as belonged to the claimant's wife should be released from seizure and restored to her.

*Reg. v. Six Barrels of Ham*, 3 All. N.B. 327, considered and not followed. *The Dominion Bag Co. v. The Queen*, 4 Ex. C.R. 311, referred to.

*L. C. Meunier*, solicitor for claimant. *H. J. T. Frihey*, solicitor for respondent.

### Book Reviews.

*A History of Divorce.* By S. B. KITCHIN, B.A., LL.B. Cape Town: J. C. Juta & Co. London: Chapman & Hall.

Very interesting reading. The object of the book is to explain how the extraordinary diversity of laws and opinions which exist in various countries as to divorce, came about, and to ascertain the principles which according to the teaching of history ought to be applied to modern legislation on the subject. The volume before us will be a helpful introduction to those who wish to study the subject in greater detail or in relation to any particular country. The volume shews great research and will be a valuable addition to all libraries as we know of no other book which gives a concise and simple account of the history of divorce. The writer moreover gives his information in an interesting and lucid manner. The typographical execution is above the average.