

*impedimenta dirimentia* of his own law was forbidden to contract marriage, although he may have satisfied all the conditions of the law of the country in which the union was celebrated. Thus under Austrian law, which accepts the Catholic theory of the indissolubility of marriage except by death so far as members of that confession are concerned, the union of one of its Catholic citizens residing in a foreign country with a person who has been divorced would be considered invalid if performed during the lifetime of the divorced party's former spouse, and could be annulled if the Courts of Austria acquired jurisdiction(24). Similar action would doubtless be taken in like cases by Spain and Portugal, neither of which recognize divorce. Difference of religious faith is also considered a bar by Austria(25), and Greece(26), and marriage between Christians and non-Christians is prohibited. Russia enforces a like restriction, but makes exception in the case of marriages between Lutherans, adherents of the Reformed Church, and other Protestants on the one hand, and Jews and Mahommedans on the other(27). The marriage, therefore, of an Austrian Catholic or an Orthodox Russian or Greek with a Canadian woman of the Jewish faith would have no validity in these foreign countries. Another absolute impediment would be presented if the alien who marries here had not yet attained the age regarded as essential by his national law, and unions with youthful foreigners involve danger of annulment by their domes. Courts owing to the fact that European and Latin American countries have usually a higher limit than our own. No male citizen of France, Belgium, Italy, Holland, Hungary, Roumania or Russia, can contract marriage before he attains his eighteenth year; if from Denmark, Norway or Bulgaria he must be twenty years of age, while natives of Germany, Sweden and Finland only become capable at twenty-one(28). The age of twenty-one is accepted by most nations as the period at which the consent of parents or guardians ceases to be obligatory, but Spain requires such consent until the

(24) U.S. Report on Marriage, 1909, p. 335.

(25) *Ibid*, p. 334.

(26) British Report on Foreign Marriages, 1894, p. 80.

(27) U.S. Report, 1909, p. 382.

(28) These ages, as well as those which follow relating to consent, are compiled from the British and U.S. Reports on Foreign Marriages, previously referred to.