of the Privy Council against the legality of Provinces seeking to impose discriminatory taxation on extra-Provincial Corporations. Fairly construed, that decision we take to mean simply this, that if a Province imposes a tax on corporations it must impose such tax on all corporations alike, and not exempt one class, and impose it on another of a similar kind. Something may perhaps be said in favor of Provinces drawing a line between corporations carrying on business for gain, and those of a merely elemosynary character; but between Provincial corporations and extra-Provincial corporations of the same class, as we read the decision of the Judicial Committee in the *John Deere Plow Case* there can be validly no distinction made in the imposition of Provincial taxes.

If a charter of incorporation is the equivalent of a licence to carry on business, then the Dominion charter is a licence to carry on business, and the provincial tax is a tax to compel the Dominion company to procure something it already has.

We are fortified in the views we have expressed by the decision of the Judicial Committee of the Privy Council in the case of *The Attorney-General* (*Can.*) v. *The Attorney-General* (*Alta.*) (1916), A.C. 588. In that case the validity of s. 4 of the Dominion Insurance Act, 1910, was in question. By that section the Dominion Parliament sought to prohibit all persons or companies from doing any insurance business in any part of Canada unless they first obtained a licence from the Dominion. It was held that this section was *ultra vires* of the Dominion Parliament. It was attempted to be supported under the Dominion authority to regulate trade and commerce; but their Lordships held that the authority of the Dominion does not under the B.N.A. Act enable it to regulate, by a licensing system, any particular trade in which Canadians would be otherwise free to engage in the Provinces. The insurance company in question in that case was one incorporated by a foreign State, but the same rule must of necessity apply to any company incorporated by a Province. That case, therefore, seems to have been the exact converse of the *Currie* case. By the Act in question the Dominion was seeking to prohibit a Provincial company from carrying on its business, unless