

dealt with as a rogue and vagabond is to be deemed an incorrigible rogue, and may be committed to the house of correction, there to remain until the next Quarter Sessions. Section 10 of the same Act empowers justices at Quarter Sessions to examine into the circumstances of the case and to order the further imprisonment of the offender, and also "that such offender (not being a female) be punished by whipping at such time and place as according to the nature of the offence they in their discretion shall deem expedient."—*Law Journal*.

POWER OF LEGISLATURE TO DISPOSE OF PUBLIC PROPERTY.
—What is known as the Chicago Lake Front Case, recently decided by the Supreme Court of the United States, is perhaps the most important lawsuit, in point of substantial results involved, which has ever come before that tribunal. The opinion extends the doctrine laid down in previous decisions of that court, that there are certain rights of the people that legislatures are bound to respect. In the earlier cases it was held that these agencies of government cannot barter away the public health and the public morals. It now declares in the present case that there is a point beyond which the people cannot, by their servants, be dispossessed of their title to public property. The Legislature of Illinois granted certain rights to the Illinois Central Railroad Company on certain conditions. The company maintained that the fulfilment of those conditions vested those rights in the company in perpetuity, under the law of contracts. The legal position of the company under this claim has seemed almost impregnable. The sanctity of contracts is rigidly upheld by the law, and the federal constitution provides that their obligation shall not be impaired. But the court rules that the rights conveyed belonged to the people and could not be conveyed in perpetuity to a private party. These words are used: "The State can no more abdicate its trust over property in which the whole people are interested . . . so as to leave them entirely under the use and control of private parties . . . : than it can abdicate its police powers." The principle thus extended is one of great importance. It not only places a limit to the attainment of private right in public property, but measures the extent of injury a State can suffer at the hands of indiscreet or venal legislatures.—*Central Law Journal*.