

her sisters and their representatives their proportion of the rents; also that the alleged document of 1868, purporting to be a gift of the lease from Mary Ann King to Sarah Ann Banks, was, in fact, a forgery, and the mortgage under which the plaintiff claimed was also a forgery. The plaintiff contended that even on this state of facts the mortgage of 1889 was sufficient to convey the estate which Sarah Jane Banks had in the lease both as executor and trustee, and as one of the beneficiaries, and that the plaintiff, having no notice of the fraud perpetrated by her, was not affected by it. But Kekewich, J., held that the conveyance by her was a breach of trust, and that, in view of the subsequently discovered evidence, the purchaser was entitled to review the order of the Court of Appeal, and that in the light of this further evidence the vendor had not made a good title, and he dismissed the action, but without costs. There were some other details connected with the case besides those above mentioned, to which want of space has prevented reference, but for the purposes of these notes the facts above set out are, perhaps, sufficient.

Reviews and Notices of Books.

The American Commonwealth. By James Bryce, author of the "Holy Roman Empire." Third edition. 2 vols. Macmillan & Co., 66 Fifth Avenue, New York. 1895. Price, \$4.00.

No English writer on the American Constitution has given to the subject such careful study and consideration as Mr. Bryce. He gives in detail the history of its development, its practical working, its results upon the political life of the people. He explains the constitution of the various bodies by which the national government is carried on, and their relation to each other. He describes the Federal Courts, their powers and methods of procedure. He deals very fully with the working relations of the national and state governments, and discusses at length the merits and demerits of the federal system, a subject of vital interest to the Canadian statesman.

Mr. Bryce's comparison of the English and American systems of government is interesting and valuable to every student of constitutional history, and his observations and deductions