property. In such a case it is now clear that the law of the province where the policy is delivered to an insured domiciled there, governs, no matter to what province or country he may afterwards remove.

It is submitted that the principle would also be applicable as soon as an appointment is made in favor of a preferred beneficiary. For instance, supposing a resident of Ontario takes out a policy payable to his estate. The policy is delivered to him in Ontario. Subsequently and while still domiciled in Ontario he makes it payable to some one in the preferred class. A statutory trust is then created in favor of the preferred beneficiary. He now has only a limited power of appointment over property which is not his own. Supposing he then moves to the Province of Quebec. The law of Ontario would still govern the question of the rights and status of beneficiaries and would continue to govern as long as the statutory trust existed, no matter how often he might subsequently change his domicile. This would be the logical result of the line of reasoning pursued in the Baeder case. Since the great majority of life insurance policies at maturity are payable to preferred beneficiaries, the importance of the decision in this case can readily be appreciated.

How far the principle laid down in the Baeder case can be applied has not yet been determined by the Canadian Courts. Would it apply where a statutory trust is not created, *e.g.*, where a policy is payable to an ordinary beneficiary? Take this case: A. living in Ontario takes out a policy payable to his father, who is not a preferred beneficiary. He then changes his residence to the State of California, and while domiciled there makes a will leaving the policy to his wife, the will being