

tinguishment of his right by statute, can her conveyance deprive a husband of his curtesy? and he refers to *Hope v. Hope* (1892), 2 Ch. 336.

In this same case of *Moore v. Jackson*, the Court of Appeal holds that the property of married women who have married prior to the 2nd March, 1872, which is not expressly settled, is not "separate property" by virtue of the statute; *ergo*, the husbands of all that class of married women are entitled to curtesy in their real estate, and cannot be deprived of it by the sole conveyance of their wives. This ought to be a fruitful source of litigation in the future. We believe many practitioners have been assuming, because since 1884 the husband's concurrence in his wife's deeds is unnecessary, that therefore his estate is in all cases barred by her sole deed. The decision of the Court of Appeal, however, in *Moore v. Jackson*, rather leads to the conclusion that it is only in the case of women married after 2nd March, 1872, that the wife's sole conveyance is effectual to bar the curtesy of her husband.

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A WRITER in the *Annals of the American Academy* discusses the need for, and a scheme of, preventive legislation in relation to crime. He states that under the social condition and the laws as they are the *convicts* for crime number about one in a little over seven hundred of population, and the *criminals* one in about four hundred; whilst forty years ago there was about one criminal in 3500 of population. This is a startling statement, and, if correct, does not give much encouragement to those who are under the impression, or delusion, that human nature is improving and the world getting better. He naturally does not think, in view of this fact, that education is a potent factor in the repression of crime, nor does he think that penalties are preventive. His panacea is a system of unlimited commitment of offenders, as opposed to the present system of punishment, which aggravates rather than reduces the evil; the criminal to forfeit his liberty, and restoration to be conditional upon reformation. He considers the most prolific sources from which criminals come are to be found in class legislation, creating inequality in social and political conditions, and in unrestricted marriage among those who are wholly unfit to enter into that relation, or to perform the duties to offspring or society which that relation entails upon them. That there is great force in this latter statement must be at once admitted, and the writer is not the first to advance it. How to prevent improper marriages is, however, the question involved. He thinks it is within the range of practical enforcible legislation. In theory this position is unassailable, and he thinks it would be possible by means of examining boards, special police, and a thorough license system to put the theory into a practice. He meets the objection to the suggestions that enough prisons could not be built to hold the offenders, and that if there could there would be more people on the inside than on the outside, by saying that the reform, being based on truth, would progress, and the gradual comprehension of the benefit would eventually make it a fact accomplished. We confess we cannot share this hope, and would rather venture to predict that the present dispensation will cease before the much-desired reform is made. He does not con-