the precedent lies in its mode of treating them indirectly. Now (4) 'where such civil question (of property or money) turns upon an express trust, American law inquires for itself into the fulfilment of the conditions of that trust, whether these be religious or ecclesiastical, to the uttermost; and it enforces the trust to the effect of settling the question of property, but to that effect only.' And still more (5) 'where property is held by a Church generally, or for Church purposes, unspecified, and not on an express trust for the maintenance of certain doctrines or government, American law presumes, in questions as to that property, that the decision of the Church is right.' This is the field of collision between the law and non-established Churches, for the bulk of their ecclesiastical property is held without conditions. Now, whereas English law, according to Lord Eldon's general rule, holds that the doctrines and practices of the Church at the time of the testator's death are the implied conditions of his bequest, American law leans towards Church freedom and development as carried out by a majority, whether in a congregation or an ecclesiastical judicatory. Where there is no express trust, the States, as a whole, invariably presume in favor of the decision of the Church by a majority. The Supreme Court goes farther, having ruled that (6) 'such decision of the Church is conclusive between the parties, and will regulate the question of civil property accordingly.' The great case of 1872, Watson *v.* Jones, rules this. In its decision, given with solemn deliberation, after reviewing American law in all the States for a century, the Supreme Court deals with the purely civil question of property, and refuses to inquire into any allegation that the congregation or church has varied from its old position or principles. So far does it go that it expressly adopts the principle (7) 'that the Church is not only the best judge, but the only proper judge of Church matters, and that there is a separate ecclesiastical jurisdiction.' Finally, 8 'the two jurisdictions work together on the quasi-international principle of comity.' As American, like European law, recognises foreign jurisdictions, so it acknowledges and treats a real ecclesiastical jurisdiction outside of itself. The only narrow field in which a serious question arises about Church acts in the civil courts is precisely that in which there is the same doubt as to questions of foreign jurisdiction. Is a Church act unconstitutional? Are damages asked because it was done in malice, or by way of conspiracy, or merely under the cloak of Church authority? Then even here the leaning is towards the Church. And these eight principles govern the relation of the law to a religious society, so far as the Church is a distinct organisation within that.

We hope our readers will note well the Italian, Scotch, and American solutions of this great question, which (substantially the same) are the only true solutions of it now before Christendom. It is very clear, from the manner the non-established churches of Scotland have received Disraeli's settlement of the relation of Church and State in that land, and from the manner the high church party in England is now resenting the interference of the State with the Church of England, that the great battle is drawing near in Britain. It will take several years to fight it. At its close, England and Scotland will be added, no doubt, to the countries, now too few, where the Church is as free to do its work, as the State is to do its work. After