

cannot insist on appealing in his own right to quarter sessions against a conviction of the license-holder: *R. v. Andover JJ.* (1886), 16 Q.B.D. 711, 50 J.P. 549, 55 L.J.M.C. 23, 34 W.R. 456, 2 T.L.R. 546. Where, however, the renewal or transfer of a license is refused to his tenant, the landlord may join with the applicant in an appeal to quarter sessions as he is an aggrieved party under 9 Geo. IV. (Imp.), ch. 61, sec. 27. Compare *Ex parte Stott*, [1915] W.N. 362, 32 Times L.R. 84; *Re Imperial Tobacco Co.'s Trade-mark*, [1915] 2 Ch. 27.

And in a later case it was held that a prosecutor is not "aggrieved" by the defendant being acquitted: *R. v. Keepers of Peace, etc., of London* (1890), 25 Q.B.D. 357, 59 L.J.M.C. 146, 63 L.T. 243, 39 W.R. 11; *R. v. London JJ., Re Fulham Vestry* (1890), 55 J.P. 56.

These English cases shew the necessity for the present form of Code sec. 749 as regards the words "the prosecutor or complainant as well as the defendant." The complainant might be excluded as a "party aggrieved," were it not for those words in sec. 749.

In *R. v. Law* (1915), 25 Can. Crim. Cas. 251, it was held that a complainant was a "person aggrieved" so as to entitle him to proceed by certiorari to quash the defendant's summary conviction made by a justice in excess of his jurisdiction where the latter should have held a preliminary enquiry only.

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## War Notes.

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The Lieutenant-Governor of the Province of Ontario has issued a Proclamation appointing August 4th, 1916, the second anniversary of the Declaration of War, as a day on which we should reaffirm our belief in the righteousness of the cause for which we are fighting, and our inflexible determination to continue the struggle until victory has been achieved. He also urges the calling of public meetings throughout the Province on the day mentioned for the purpose of stimulating the devotion and patriotism of our people and of embodying the above sentiments in appropriate resolutions and thereby uniting them effectively for the supreme effort which is necessary to bring the war to a victorious issue.

The Proclamation begins as usual in the name and under the authority of "George V., by the Grace of God, King, Defender of the Faith, etc." This is the only reference in the Proclama-