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to sue on claims of the corporation, unlike those of an ordinary receiver, assignee in bankruptcy, or executor, are fully recognized outside of the state. *Relfe* v. *Rundle*, 103 U. S. 222; *Bockover* v. *Life Ass'n*, 77 Va. 85. *Cf. Willetts* v. *Waite*, 25 N. Y. 577. See BEALE, FOREIGN CORPORATIONS, § 799; see 29 HARV. L. REV. 442, 443. The distinction rests on the theory that the statutory successor does not assume the position of a mere representative, but takes all the rights of the deceased as a universal successor. But since the law of the domicile cannot pass title to realty situated abroad, he does not take title to such property. *City Insurance Co.* v. *Commercial Bank*, 68 Ill. 348. As to personalty, however, he takes precedence over creditors of the corporation even in a foreign jurisdiction. *Parsons* v. *Charter Oak Life Ins. Co.*, 31 Fed. 305. In the principal case the plaintiff proceeded on the basis of an action *quasi in rem*, since a judgment against the corporation could not be obtained. But the commissioner having obtained title under the laws of Pennsylvania, no attachment could be made on the property to subject it to claims directly against the corporation.

CONSTITUTIONAL LAW — DUE PROCESS OF LAW — EQUAL PROTECTION OF THE LAWS — STATUTE PROHIBITING USE OF TRADING STAMPS. — State statutes imposed a prohibitive license tax on the use of trading stamps redeemable in merchandise. *Held*, that the statutes are constitutional, as a proper exercise of the police power. *Rast* v. *Van Deman & Lewis Co.*, Sup. Ct. Off., No. 41; *Tanner* v. *Little*, Sup. Ct. Off., No. 224; *Pitney* v. *State of Washington*, Sup. Ct. Off., No. 242.

The great weight of authority has hitherto held such statutes unconstitutional. *People* v. *Gillson*, 109 N. Y. 389, 17 N. E. 343; *Ex parte Drexel*, 147 Cal. 763, 82 Pac. 429. See 2 L. R. A., N. S. 588, note. The cases went on the ground that since there was no element of chance in the trading stamp business, it did not partake of the nature of gambling, but was a legitimate form of advertising, and as such could not be prohibited. See FREUND, POLICE POWER, § 293. But it is at least arguable that such schemes, by tempting the ignorant with the hope of getting something for nothing, lure them to improvidence and extravagant expenditure. Furthermore, unlike ordinary advertising, the trading-stamp system serves no useful purpose. See FREUND, POLICE POWER, p. 279. It thrusts an additional and unnecessary cost on distribution which must ultimately be borne by the entire public, and under our competitive system it cannot be successfully resisted by individuals. And it would be a perversion of the Fourteenth Amendment to say that it prohibits the remedy of community action in these otherwise incurable diseases of competition, detrimental to the whole public. For the police power embraces all regulations designed to promote the general welfare or prosperity. See *Chicago, etc. Ry. Co.* v. *Drainage Commissioners*, 200 U. S. 561, 592; *Noble State Bank* v. *Haskell*, 219 U. S. 104, 111; *Eubank* v. *City of Richmond*, 226 U. S. 137, 142. Such legislation will not be overthrown by the courts unless utterly unreasonable or purely arbitrary. *Otis* v. *Parker*, 187 U. S. 606; *McLean* v. *Arkansas*, 211 U. S. 539. See *Schmidinger* v. *Chicago*, 226 U. S. 578, 587, 588. Likewise, if there is any reasonable ground for the classification adopted, the equal protection clause of the Fourteenth Amendment is not violated. *Lindsley* v. *Natural Carbonic Gas Co.*, 220 U. S. 61; *International Harvester Co.* v. *Missouri*, 234 U. S. 199. Nor need a statute cover the whole field of possible abuses in order to hit what the legislature deems an evil. *Central Lumber Co.* v. *South Dakota*, 226 U. S. 157; *Keokee Coke Co.* v. *Taylor*, 234 U. S. 224. There clearly is sufficient difference in fact between the use of trading stamps and ordinary advertising to afford a reasonable basis for a legislative discrimination. It is to be hoped that the principal cases mark the turning of the tide on this question.