All of these institutions stand, as respects their claim to exemption from taxation under the constitution, on the ground of their being institutions of purely public charity. If property is appropriated to the support of a charity which is purely public, we see no good reason why the legislature may not exempt it from taxation, without reference to the manner in which the legal title is held and without regard to the form or character of the organization adopted to administer the charity. To illustrate: If the organization by which these schools are maintained were incorporated, no question could be made as to the existence of authority to exempt their property from taxation; now if the property is appropriated to the same public uses and the same ends are accomplished, we see no constitutional obstacle to prevent the legislature from exempting it as fully without incorporation as with it. What the legislature might accomplish indirectly, through the intervention of a corporation—a thing of its own creation—it may accomplish indirectly. Nor is it essential to the existence of an institution as an organization that it should be constituted under corporate or legislative authority; *in re* Manchester College, 19 Eng. L. and Eq., 404.

"A consideration of this provision of the statute shows that the word "public," as here applied to school-houses, colleges and institutions of learning, is not used in the sense of ownership, but as descriptive of the uses to which the property is devoted. The schools and instruction which the property is used to support must be for the benefit of the public. The word *public*, as applied to school-houses, is obviously used in the same sense as when applied to colleges, academies and other institutions of learning. The statute must be construed in the light of the state of things upon which it was intended to operate. At the time of its passage there were few, if any (and we know of none), colleges or academies in the State owned by the public, while