of imprisonment, varying in length from three years to ten years in the case of Chigango.

It is obvious that the case raises very interesting questions. It was admitted during the trial that native religion and custom had necessarily to bow to the supremacy of British law. The natives were informed of new statutes. But no systematic attempt was made to instruct them in common law, or to inform them how far their customs were illegal. The judge, indeed, remarked at the trial that the natives usually learnt what British laws were only when they had broken one of them. Bibles were circulated among the natives. And it was mentioned, as a curious fact, that these Bibles contained a picture of Abraham about to sacrifice Isaac in obedience to Divine command.

A civilized government is not only justified in preventing, but is bound to prevent human sacrifices from being carried out in its territory. But it must be remembered that many local customs exist which run counter to British ideas of law and of morality. We may instance polygamy, which is permitted, so far as natives are concerned, in large parts of the British Empire.

It may be urged that ideas such as we have described concerning the rain goddess should be regarded as coming within the boundary of insane delusions. Such was, in fact, the line of defence taken by counsel for certain of the prisoners. It might be possible to obtain a verdict of "Guilty but Insane" in the case of a man in this country who claimed to have killed his son by Divine command. There are, in fact, cases in which such a verdict has been obtained. But it is difficult to regard a man as insane for holding and acting upon the beliefs of his nation, which beliefs he has been brought up to receive.

Chigango himself was defended on the grounds of his conscientious motives. It was urged that he had no other motive for the sacrifice of his son than that of the desire to do what was best for his tribe according to his religious beliefs. We are bound to prevent such beliefs from being carried to their logical conclusions. But it becomes us to walk humbly in this matter, and not to exalt ourselves unduly as compared with those whom we often stigmatize as ignorant savages. It is not so very long since we dealt with witches in a way not far removed from the murder of Manduza in this case. And, even now, it is not easy to justify some of our penal methods (for example our treatment of those who attempt suicide) on other than "religious" grounds.

Rex *v.* Herbert Clifford Gosnell.

This case was tried at the Central Criminal Court on March 27, before Judge Atherley-Jones, K.C. The defendant was a solicitor,

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æt. 67. He was indicted for publishing an obscene libel in the form of a letter addressed to a young girl.

The defendant pleaded "Guilty." And, on his behalf, counsel placed certain facts before the Court. In January of this year the defendant underwent medical treatment, during which he had to take, eight times a day, a preparation containing some aphrodisiac drug. Without urging that the defendant was insane in the legal sense, counsel submitted that this was a case in which the offence was clearly due to mental abnormality. Dr. Stoddart was of opinion that the defendant should go into a nursing home for an operation.

Dr. Stoddart said that he had found a certain amount of arterial disease of the brain in the defendant, as also some affection of the nervous system.

Evidence was given as to the very high moral character hitherto borne by the defendant.

Judge Atherley-Jones said that he would not attempt to define, nor did he know, what insanity was; but it did not matter, on the facts, whether the mental state in this case was called insanity or not. He considered the defendant to be worthy of commiseration, and he bound him over in his own recognizances, and in those of his brother.

This is the second occasion, within recent date, that we have had the opportunity of commenting upon the very enlightened attitude adopted by this particular judge. All who have experience of these most sad cases of sexual offences committed by elderly men of hitherto respectable life will agree that the view which the judge took was entirely correct, and that the case was one for treatment rather than for punishment. The McNaughten dicta would have left no loop-hole in this case, although it might, perhaps, be brought within the limits of the suggested new rule as to "irresistible impulse." We can only hope that Judge Atherley-Jones' example will be followed by other legal authorities, and that the necessary corollary of the provision of treatment for those cases who cannot afford it for themselves will also be adopted.

Part II.—Reviews.

Poine: A Study in Ancient Greek Blood Vengeance. By HUBERT J. TRESTON, M.A. Longmans, Green & Co., 1923. Crown 8vo. Pp. ix + 427. Price 21*s.*

In the historic development of the rules governing punishment of homicide in Greece, and in the modern theories upon the subject,

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