

therein. There was no actual notice to the authorities shown, but it appeared that the street commissioners resided in plain sight of the crossing. The Court held that a direction by the trial judge of a verdict for defendant, on the ground that there was no notice of the defect to defendant or to its officers shown, was error. It was not necessary that there should be express notice. If there existed a state of facts with which ignorance was not compatible except upon an assumption of failure to exercise reasonable official care, then there was sufficient ground for presuming notice. So far as the two cases are parallel the decision of the Michigan Supreme Court agrees with the judgment which we reported last week. For the information of those who may be desirous of following up the subject we append the following list of authorities cited:—*Dewey v. Detroit*, 15 Mich. 307; *Requa v. Rochester*, 45 N. Y. 127; *Johnson v. Milwaukee*, 46 Wis. 568; *Colby v. Inhabitants of Westbrook*, 57 Me. 181; *Howe v. Plainfield*, 41 N. H. 135; *Prindle v. Fletcher*, 39 Vt. 255; *Manchester v. Hartford*, 30 Conn. 118; *Donaldson v. City of Boston*, 16 Gray, 508; *O'Neil v. New Orleans*, 30 La. Ann. 220.

Another case which agrees with the above so far as it goes, was decided by the Supreme Court of Rhode Island on the 14th of July of this year, *Bowman v. Tripp* (14 Rhode Island Reports). A. and B. were injured by driving into a pile of gravel in a highway, and brought suit against the town in which the highway was situated. The pile of gravel had been accumulating in the highway during an afternoon. To establish the negligence of the town authorities the plaintiff introduced in evidence the police regulations of the town, which made it the duty of the police patrolmen to note and report without delay all obstructions in the street. The Court held that the evidence was properly admitted. Had the police patrol performed its duty the obstruction would have been made innocuous.

MR. VINCENT ON CRIME.

Mr. Howard Vincent, as chairman of the Jurisprudence Department and the Crime Section of the Social Science Congress, on the 5th of October, delivered an address on the causes, results, prevention, detection, and punishment

of crime, and the treatment of discharged prisoners. He said that, excluding Ireland, the direct cost of crime in England, Wales, and Scotland was nearly six millions yearly in police, prisons, reformatories, legal proceedings, and the value of property stolen. Magistrates, police, prison officials, &c., numbered 74,000 persons. In 1881 there were apprehended, or cited, 825,657, or nearly one in 36 of the population, but only 94,868 for offences against the person and 122,761 for offences against property, the remaining three-fourths for minor offences. In recent years serious crime had diminished in amount if not in character. In 1882 there were only 101 more convicts than in 1871, notwithstanding the increase of the population by three and a half millions. This was largely attributed to the temperance movement, home missions, Board Schools, reformatories, and industrial schools. For 1880-81, London compared well with Paris, Berlin, and Vienna, Paris having proportionately most murders and robberies with violence, Berlin most forgeries, Vienna most burglaries, and London most larcenies from the person. It was no disparagement to education and temperance to say that the chief factor in prevention was the police. There were advantages in police forces locally independent, and much might be said against general consolidation, but it would be economical and it would facilitate prevention and detection of crime. The English police was the admiration and envy of foreigners; but it might be improved by the establishment of a central constabulary school for the general instruction of young constables. It was difficult to find good men; and they required two or three years' experience of ordinary police duty. The police laboured under greater disadvantages in England than in Scotland or abroad, owing to the facilities for the disposal of stolen property. This was the more serious because the most frequent crime was burglary. In London two-thirds of the robberies were committed in the absence of inmates or through windows and doors being left insecure. The culprit mostly escaped unobserved, and hundreds of receivers were ready to take the stolen property. The stolen goods bill had twice passed the House of Lords and its Select Committees. Sometimes the rapidity of procedure frustrated justice. A case had occurred in which a prisoner was