

C. & P. 518, and Baron Alderson, in *Regina v. Griffin*, 6 Cox C. C. 219, favoured their exemption. But no judge has ever said that if a priest offered to disclose communications made to him by a prisoner he would decline to receive them in evidence.—*Ib.*

SECRET COMMISSIONS.—It is primarily to the Lord Chief Justice of England and to Sir Edward Fry that the credit of setting an effective agitation on the subject in motion belongs. There have from time immemorial been cases in which the receivers of secret commissions have been compelled to disgorge them, and nothing could be better, in point of moral indignation, than the scathing comments with which successive English judges accompanied these decrees for restitution. But such denunciations were too often restricted to the particular facts with which the Courts had to deal, and were never carried into the region of general action. Lord Russell's declaration in the *Oetzmann Case* that he would do his best in future to make the recovery of secret commissions impossible constituted a new and most salutary judicial departure; and Sir Edward Fry, who, though unfortunately he can no longer wield the thunderbolts of the Bench, still speaks with the authority of one of the most distinguished of English lawyers and judges, has strongly and successfully reinforced the Lord Chief Justice's action, both by demonstrating against a host of correspondents the urgent need for an awakening of the national conscience on the subject, and by indicating a variety of practical methods to prevent the healthy public sentiment which has been aroused aimlessly evaporating. It is unnecessary to dwell further upon the points in the controversy of which Sir Edward Fry has borne the brunt. The only argument urged against him which deserves even a passing notice was that of a correspondent who cited the cases of a banker who gets a return commission on the purchase of stock, and a solicitor receiving a commission for effecting a fire insurance for a client. The obvious answer to these alleged analogies is that it is the secrecy which makes the difference between commissions that are and those that are not illicit. The point of present importance now, however, is not the existence of the disease in the body mercantile, but the means by which it is to be cured, and it is here that Sir Edward Fry's suggestions are peculiarly valuable.—*British Review.*

APPOINTMENT.—The Minister of Justice of the Dominion of Canada has appointed Mr. Charles Russell, of the firm of Messrs. Day, Russell & Co., to be solicitor in the United Kingdom for the Government of the Dominion of Canada.