

population reached its highest point, in that year the aliens numbering 2.22 per cent. of all the convicted prisoners received into prisons. By 1907 this proportion of aliens to the whole had fallen to 1.60, and although in 1908 there was an increase of 5.76 per cent. in the total number of convicted prisoners, and this was reflected in the number of aliens, the increase in the proportion of aliens was only up to 1.62 per cent. Of course, it is impossible with any certainty to say that this decrease in alien prisoners is entirely due to the Act of 1905, for this can only be proved by the experience of future years; but, at any rate, there is no doubt that there has been a substantial reduction since the statute came into force, and we certainly think that, if its provisions were made use of more freely by the courts throughout England and Wales, still further improvement might be made in the elimination of the alien criminal.—*Law Times*.

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The enterprise, if it may be so called, of the newspaper press in so industriously stirring up the filth dumps of society in order to discover, if possible, something that will pander to the morbid curiosity of the people, often exposes them to serious liability by reason of their quick conclusions and careless investigation. The good name and character of a man cannot be recklessly squandered away by a newspaper even indirectly and without intention to offend. The occasion for these serious reflections is the recent decision of the Supreme Court of New York in the case of *Burkhardt v. Press Publishing Co.*, 114 N.Y. Supp. 451. In this case appellant saw visions of a sensational article involving a woman of evil reputation. It sent a reporter to the woman's family to secure her photograph and received two pictures, one on a tin type and the other on a button. The latter picture, however, was not the picture of the evil woman but of respondent. The button picture, however, was published in connection with the sensational story as the picture of the "woman in the case." Respondent recovered punitive damages in the lower court and the