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CURRENT TOPICS AND CASES.

The Queen's Bench Division, Ontario, in *R.* v. *Plowman*, 19 November, 1894, quashed a conviction for bigamy where the second marriage took place in a foreign country, and there was evidence that the defendant, who was a British subject, resident in Canada, left Canada with the intent to commit the offence. The provisions of sect. 275 of the Criminal Code make such a marriage an offence, the first clause reading as follows:—" Bigamy is (*a*) the act of a person who, being married, goes through a form of marriage with any other person *in any part of the world.*" This is modified by Sub-sect. 4: " No person shall be liable to be convicted of bigamy in respect of having gone through a form of marriage in a place *not in Canada*, unless such person, being a British subject resident in Canada, leaves Canada with intent to go through such form of marriage." The Court held that the provisions of the Code are *ultra vires* of the Parliament of Canada. The case of *Macleod* v. *Atty. General for New South Wales* [1891] A. C. 455; 14 L. N. 402, was followed. See also the authorities cited in Taschereau on the Criminal Code, p. 280; Crankshaw, p. 211.