

guiltless of the crime, and it was only through the exertions of a private individual that an innocent man was saved from the gallows. A fellow-countryman of his, a Mr. Negretti, succeeded in persuading the real culprit (the Gregorio so expressly exculpated by the judge) to come forward and acknowledge the crime. He was subsequently tried for manslaughter and convicted, while Pelizzioni received a free pardon. Again, in 1877, two men named Jackson and Greenwood were tried at the Liverpool Assizes for a serious offence. They were found guilty. The judge expressed approval of the verdict, and sentenced them to ten years' penal servitude. Subsequently fresh facts came to light, and the men received a free pardon. Once more, in 1879, one Habron was tried for the murder of a policeman. He was found guilty and sentenced to death. An agitation for a reprieve immediately followed. The sentence was commuted to penal servitude for life. Three years after, the notorious Peace, just before his execution for the murder of Dr. Dyson, confessed that he had committed the murder for which Habron had been sentenced. With these incidents fresh in our minds, let us turn once more to St. Giles and St. James, and listen to the indignant words of Douglas Jerrold: "Oh, that the ghosts of all the martyrs of the Old Bailey—and though our professions of faith may make moral antiquarians stare, it is our invincible belief that the Newgate Calendar has its black array of martyrs; victims to ignorance, perverseness, prejudice; creatures doomed by the bigotry of the Council table, by the old haunting love of blood as the best of cures for the worst of ills,—oh, that the faces of all these could look from Newgate walls! That but for a moment, the men who stickle for the laws of death as for some sweet domestic privilege might behold the grim mistake, the awful sacrilegious blunder of the past, and seeing, make amendments for the future."—*Fortnightly Review*.

PUBLICATION OF SPEECHES BY MEMBERS OF COMMONS.—In his Commentaries on the Constitution of the United States, Mr. Justice Story says: "Although a speech delivered in the House of Commons is privileged, and the member cannot be questioned respecting it elsewhere, yet if he publishes his speech, and it contains libellous matter, he is liable to an action and prosecution therefor, as in common cases of libel. And the same principles seem applicable to the privilege of debate and speech in Congress." § 866.

To this the following note will appear in the 5th ed. of the same work (now in the press), by the editor, Mr. Bigelow:—

The first sentence quoted would now be too broad a statement. A member of Parliament may certainly circulate among his constituents a speech made by him in Parliament. *Wason v. Walter*, L.R. 4 Q.B. 73, 95; *Davison v. Duncan*, 7 El. & B. 223, 229. (For the law of England before legislation see *Stockdale v. Hansard*, 9 Ad. & E. 1: *Wason v. Walter*, *supra*.) And it may be doubted whether any such qualification of the privilege as that suggested (of constituency) can be worked in this country. Practically, the qualification is everywhere ignored, if it exists. Members of Congress, if not of the State Legislatures, act upon the supposition that the circulation, by themselves, of their speeches is