

worth noticing is the ruling in the *Sunderland Case* that a false statement of fact, calculated to affect the result of the election, is within the Act, though it may not be defamatory at common law. Thus, to use Baron Pollock's illustration, the Act might apply to a statement in a hunting county that the candidate had shot foxes, or to one in a manufacturing constituency that he hunted five days a week.

The payment of an elector's tram fare by an agent was held at Lancaster not to be an illegal practice, because it was not made with the object of inducing the elector to vote. In that instance the parties were friends, going together to the polling-station, and the agent paid 6d. for the fare of both, an act of kindness which is probably done frequently every day in every tramcar or omnibus.

A payment by a candidate for the baiting of horses used in the conveyance of voters to the poll was held in the *Lichfield Case* to be within section 7, sub-section 1 (a), of the Corrupt Practices Act, 1883, and therefore an illegal practice.

The question of treating at public meetings arose at Lancaster and St. George's. It has been decided not to be corrupt treating on the part of a political association to attract the public to a meeting by means of refreshments, an election not being imminent. Nor is it treating for the chairman at a smoking concert, not given for the purpose of influencing voters, to "stand drinks" to the persons who surround him.

One result of the petitions has been an expression of grave discontent with the present state of election law, though for widely different reasons. On the one hand, it is said that the Act of 1883 is too severe. A member may be unseated because of a single indiscretion on the part of some person over whom he can exercise no control, as happened at Southampton to Mr. Chamberlayne, because an ardent supporter paid two shillings to bring one voter from Winchester. Again, a candidate may in ignorance commit acts trifling in themselves but disastrous in their results. The cross-petition against Mr. Benn, for instance, succeeded because he paid for some laths used in making banners for the display of his portrait, and because, having a committee-room in his own house, he failed to include the expenses connected therewith in his return. On the other hand, there are austere politicians who think that the decisions as to charitable