

janvier, le pétitionnaire a déclaré son enquête close sauf le droit de faire entendre Bourassa, contre lequel une règle fut émanée, et l'enquête du mis en cause a été fixée au deux février suivant. Bourassa ne comparut pas et la règle fut rapportée contre lui. Durant la même séance du 2 février, une règle fut demandée contre le mis en cause qui avait aussi négligé de répondre à la sommation qui lui avait été faite; au moment où la règle allait émaner, il comparut en Cour, et il fut permis au pétitionnaire de réouvrir son enquête à l'effet de faire entendre le nommé Houle pour identifier le mis en cause. L'enquête du pétitionnaire est de nouveau déclarée close sauf la règle émanée contre Bourassa. La Cour fut ajournée à deux heures pour l'enquête du mis en cause McShane. A 2 heures le mis en cause déclara qu'il n'avait pas d'enquête à faire, et s'objecta à ce que le juge chargé de l'instruction entendit sa cause au mérite. Cette objection prise en délibéré après un long argument, fut jugée le six février dernier, le juge déclarant, sans admettre toutefois que l'objection était fondée, qu'il croyait que la Cour siégeant au mérite, avait le pouvoir de s'enquérir du mérite de l'enquête sur la mise en cause, et que sous les circonstances il convenait de réserver la question. Ce dernier procédé mit fin aux procédures sur la mise en cause à l'instruction.

[The remainder of the opinion relates to the proof of the corrupt practices].

THE BANK'S DUTY TOWARDS ITS CUSTOMER'S BILLS.

The case of *Vagliano v. The Bank of England*, 58 Law J. Rep. Q. B. 27, is a tale of clever simulation by one Glika, a name with a smooth foreign sound, who in a period of eight months manipulated the course of mercantile events so successfully as to create and pass through their various stages forty-three bills of exchange, which, as the sole object of their existence, put 71,500*l.* into his pocket. His leverage for moving the world was found at his desk, that of the correspondence clerk in the office of Vagliano Brothers, merchants and foreign bankers. After five years' watching the beautiful simplicity of the operation by which money was extracted from the

Bank of England by means of a foreign bill, he appears to have asked himself why he should not play a less humble part in it than that of the correspondence clerk, and whether he could so contrive as to constitute himself the payee. He would have, however, like other actors on the world's stage in his time, to play many parts; but these had been rehearsed so often under his eyes that he had no difficulty in undertaking them. The first thing to be done was to provide a letter of credit, and no better correspondent could be chosen than Mr. George Vucina, of Odessa, whose bills had been accepted in the office for practically any amount for nine-and-twenty years. He might be made to advise the advent of a bill drawn for a handsome sum to his own order, or, better still, to that of C. Petridi & Co., of Constantinople, with whom he had transactions. It was only necessary to be perfect in paper, writing, and especially signature, to slip an extra letter of advice of Vucina's in the morning's correspondence of the firm, and it would in due course appear in the 'bills payable' book. In due time it was easy to slip a bill of exchange to correspond in the 'bill-box' in the next room, already stamped with the name of 'F. Pasqua & Co.,' or any name, as the firm collecting the bill, which would be in regular course stamped 'Accepted payable at the Bank of England.' Hardly more difficult was it to take the bill out of the portfolio which would be provided for the messenger of the supposed 'F. Pasqua & Co.,' and which would be left in the 'foreign correspondence' room. The name of the payee remained to be put on the back as the finishing touch, and the process was complete, the manufactured article being delivered over the counter at the Bank of England either by the principal or an assistant, and duly realised.

The patience and ingenuity of the operation itself required similar qualities in unravelling it in a Court of law, which were displayed by the five days' hearing given to the subject by Mr. Justice Charles, with the assistance of an array of Queen's counsel on both sides. The claim made against the Bank of England, on the discovery of the fraud, was for the repayment of the sums which the bank had charged against their