fare, recieved a ticket which he refused to show to an inspector of the company; he was summoned for breach of the by-law. The Court of Appeal (Lindley and Kay, L.JJ.), held that the by-law was reasonable and that the defendant ought to be convicted.

In connection with these cases the much litigated case of *Beaver* v. *The Grand Trunk Ry.*, 22 S.C.R. 498, may be referred to.

MUNICIPAL CORPORATION—BY-LAW—REASONABLENESS—USE OF PROFANE OR OBSCENE LANGUAGE.

In *Strickland* v. *Hayes*, (1896) 1 Q. B. 290, the validity of a municipal by-law was in question. It provided that "no person shall in any street or public place, *or on land adjacent thereto*, sing or recite any profane or obscene song or ballad, or use any profane or obscene language." The defendant had been convicted of having used the language complained of on a foot path in a field in the presence of a large number of persons. The facts were admitted, but the defendant contended that the conviction should be quashed on the ground that the by-law was unreasonable and therefore bad. The Court of Appeal (Lindley and Kay, L.JJ.) sustained the objection, holding that the words "or on land adjacent thereto" were clearly too wide, and made the by-law unreasonable, and that even if the by-law were read omitting those words, it would be still unreasonable, as it did not contain any words importing that the acts must be done as so as cause annoyance to some other person or persons.

GAMING—BETTING—PLACE FOR PURPOSES OF BETTING—16 & 17 VICT., C. 119, S. 3—(CR. CODE, S. 197).

Liddell v. *Lofthouse*, (1896) 1 Q. B. 295, was another case stated by magistrates. The defendant had been charged with an invasion of the Betting Act (16 & 17 Vict., c. 119), sec. 3 (Cr. Code, sec. 197). He was proved to be in the habit of going to a certain piece of ground, which was bounded on one side by a hoarding, and on two sides by stays supporting the hoarding, for the purpose of betting with persons resorting thereto. The justices doubted whether this was "a