CRIMINAL LAW—SUMMARY CONVICTION—INFORMATION DISCLOSING TWO OFFENCES—DEFECT IN SUBSTANCE—OBJECTION NOT TO BE ALLOWED—SUMMARY JURISDICTION ACT, 1848 (11 & 12 VICT., C. 43), SS. 1, 10 (R.S.C., C. 178, SS. 26, 28).

Rodgers v. *Richards* (1892), 1 Q.B. 555, was a case stated by a magistrate for the opinion of the court. On the hearing of the charge before the magistrate, it was objected that the information disclosed two offences, contrary to the provisions of the Summary Jurisdiction Act, 1848, s. 10 (R.S.C., c. 178, s. 26), and the magistrate allowed the objection, and the question was whether he was right in so doing. Hawkins and Wills, JJ., held that he was not, on the ground that the objection was a defect in substance which, under s. 1 of the Act (R.S.C., c. 174, s. 28), the magistrate had no power to allow, but that he might properly refuse to allow the prosecutor to proceed on both charges, and, if necessary, might adjourn the hearing if the defendant had been misled.

VETERINARY SURGEON—UNQUALIFIED PERSON—"VETERINARY FORGE"—VETERINARY SURGEONS' ACT, 1881 (44 & 45 VICT., C. 62), S. 17, S-S. 1 (R.S.O., C. 39, S. 34, S-S. 3).

The Royal College of Veterinary Surgeons v. *Robinson* (1892), 1 Q.B. 557, was a prosecution instituted against a person for holding himself out as a veterinary surgeon, not being duly qualified, contrary to the provisions of the Veterinary Surgeons' Act, 1881, s. 17, s-s. 1, which is similar in its terms to R.S.O., c. 39, s. 34, s-s. 3. The defendant was a shoeing smith, and was not possessed of the qualification of a veterinary surgeon as specified in the Act: but he had for the last twenty-five years described his place of business as a "veterinary forge," and it was held by Hawkins and Wills, JJ., that these words constituted a description stating that he was qualified to practise a branch of veterinary surgery within the meaning of the statute, and that he was liable to the penalty thereby imposed.

None of the cases in the Probate Division call for any notice here.

COMPANY—DIRECTOR—PRINCIPAL AND AGENT—QUALIFICATION SHARES—AGREEMENT BY PROMOTER TO INDEMNIFY DIRECTOR AGAINST LOSS ON SHARES—SECRET PROFIT.

In re North Australian Territory Co. (1892), 1 Ch. 322, is a decision of the Court of Appeal (Lindley, Bowen, and Fry, L.JJ.), reversing Kekewich, J. which seems to carry the law against directors making secret profit further than any previous decision. The case was shortly this: A Mr. Archer was applied to by the promoter of a company to become a director, and the promoter made a secret agreement with him to take the shares it was necessary for him to purchase in order to qualify himself as a director at the same price which Archer should pay for them. Archer bought fifty shares with his own money, and became a director. The company subsequently became insolvent and the shares worthless. Archer retired, and the promoter took over his shares at the price he had paid for them. The liquidators of the company now claimed to recover from Archer the amount he had thus received for his shares, as being a secret profit made by him to which the company was entitled. Kekewich, J., held that the liquidators were not entitled to recover, but the Court of Appeal con-