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CRIMINAL LAW—FELONY—ACCESSORY AFTER THE FACT—"RECEIVE, HARBOUR AND MAINTAIN"—REMOVAL OF INCRIMINATING ARTICLES AFTER ARREST OF PRINCIPAL.

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*The King v. Levy* (1912) 1 K.B. 158. In this case, after the arrest of a man charged with a coining offence (of which he was afterwards convicted), the appellant, a woman, removed from a workshop occupied by the man certain articles which would be used in making counterfeit coin. The appellant was indicted as an accessory, the indictment alleging that she well knowing the man had committed a felony "did feloniously receive, harbour and maintain him." The jury were directed that if they believed the appellant removed the articles knowing the man to be guilty, and for the purpose of assisting him to escape conviction, they should find the accused guilty, which they did; and, on a case stated, the Divisional Court (Lord Alverstone, C.J., and Hamilton, and Bankes, JJ.) held that the conviction should be affirmed, because any assistance given to a felon in order to hinder his conviction, was a "receiving" of him, and makes the person giving it an accessory.

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An official at Osgoode Hall, Ontario, who knows a good thing when he sees it and likes to divide up with his brethren, sends us the following expressions used in affidavits on file in his office. They are extracts from affidavits on file in three distinct and separate matters coming from a different law office in each case:—No. 1. A woman swears: "I am the lawful widow and relic" (note the last word); No. 2. a solicitor swears: "I have had the 'conduction' of this case"; No. 3, a woman swears: "I am the 'natural' and 'lawful' mother of," etc.