

Although the law of criminal conspiracy probably has existed from the earliest period of the common law, certainly since the statute of conspiracy (33 Edw. I. St. 1, Anno 1305), yet there was no separate work on the subject until 1873, when "The Law of Criminal Conspiracies and Agreements" was published in England. That work dealt entirely with the English law of conspiracy from its earliest history down to 1872. In speaking of it Sir J. F. Stephen said: "Mr. R. S. Wright, in a work of remarkable learning and ability, collected and commented, with a special view to this particular subject, upon every case ever decided upon the subject of conspiracy."

On October 1, 1887, the Blackstone Publishing Company, Philadelphia, Pa., brought out, in a single volume, Wright's work and "The Law of Criminal Conspiracies and Agreements as found in the American Cases," by Hampton L. Carson of the Philadelphia bar, which is the first distinct American book on this important branch of criminal law. It opens with a "General View" of the law relating to the crime of conspiracy, giving in a few concise sentences a full, clear outline of the entire development of this branch of law.

This is followed by a chapter on "The Origin and History of the Law of Criminal Conspiracies," in which is given a full discussion of the American view. The author, in a few succinct sentences, states the facts of each case presented, with careful discrimination, quotes the pith of the judicial decisions, and, when occasion requires, criticises and comments on the statement of law in clear, terse language.

"The Nature of the Crime" is the title of the second chapter, which is divided into two sections. I. At Common Law. II. By Statute. Under the first section the law of the different States is discussed in three classes, the law of the State which has best enunciated a doctrine forming the nucleus around which other States, entertaining the same view, cluster. At the end of this section is a masterly *résumé* of the subject, which clearly points out the author's conception of the existing law. This plan of discussion is followed in other chapters where it becomes necessary.

The second section deals with a general discussion of the statutes of the different States.

In the third chapter all conspiracies held to be indictable are enumerated and arranged into classes. The class relating to the rates of wages, strikes and boycotts, is elaborately treated. All the cases on the subject are noticed and all the important ones discussed, and the rare ones copiously quoted. Where any of these had been modified by statute, the modification is noted. The author's summary of the result of these cases is as follows: —

"The result of all the cases, ignoring matters of detail or special circumstances, appears to be as follows: Workmen may combine lawfully for their own protection and common benefit; for the advancement of their own interests, for the development of skill in their trade, or to prevent overcrowding therein, or to encourage those belonging to their trade to enter their guild; for the purpose of raising their wages, or to secure a benefit which they can claim by law. The moment, however, that they proceed by threats, intimidation, violence, obstruction, or molestation, in order to secure their ends; or where

their object be to impoverish third persons, or to extort money from their employers, or to ruin their business, or to encourage strikes or breaches of contract among others, or to restrict the freedom of others for the purpose of compelling employers to conform to their views, or to attempt to enforce rules upon those not members of their association, — they render themselves liable to indictment. 'The rights of workmen are conceded, but the exercise of free will and freedom of action, within the limits of the law, is also secured equally to the masters.' "

Chapter IV. contains the requisites of indictment, with notes of cases and the rules in different States.

Chapter V. deals entirely with the rules of evidence in trials of conspiracy.

Chapter VI. with judgment, sentence and merger.

To these are added two appendixes, one giving the statutes of the United States and the States in full, with references to cases; the other forms of indictments taken from the great leading cases of conspiracy.

The indexes to the different works, and to the cases cited in each are complete, their arrangement excellent.

Mr. Carson has given the profession a work which supplies a long felt need. His arrangement of the work is simple, logical and effective. His treatment of this intricate subject is masterly. He has in a clear, vigorous style pointed out the pivots on which the law has turned, and has brought order out of chaos.

It is a work that should be in every library, that should be studied by every employer of labor.

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