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NOTES OF CASES.

Compelling Autoists to Give Their Numbers.—California has a statute (Penal Code, § 387c, as amended by Statutes 1913, p. 218) providing that, whenever an automobile strikes a person or collides with another vehicle, the driver or person assuming authority over the driver shall cause the automobile to stop and to render the person in the other vehicle assistance, and shall give him the number of the colliding automobile, with the name and address of the driver and owner and the names of the passengers. Defendant was convicted of the offense defined in the above statute; it being charged that while driving an automobile a collision occurred between the one operated by him and another automobile, and that he did not stop his car, nor give the occupants of the other automobile the number of his car, his name and address, nor the name of the owner of the machine which he was driving when the collision occurred. On appeal he attacks the validity of the statute upon the ground that it is obnoxious to the section of the Constitution which provides that no person shall be compelled in any criminal case to be a witness against himself. The court said: "Appellant's argument is that since such a collision might be due to dereliction of duty under circumstances showing an actual intent to injure, and upon which a charge of criminal negligence might be based against the driver, the information which he is required to give under the provisions of said section 387c could be used as evidence in prosecuting him for the offense. * * * In a New York case (People v. Rosenheimer, 209 N. Y. 115, 102 N. E. 530) the court held that it was within the power of the Legislature to prohibit altogether the operation of automobiles on the public highways, and, since this power might be exercised by the Legislature, any restrictions or conditions attached, less than absolute prohibition, subject to which they might be operated, were lawful. * * * In the case at bar it is not claimed, or even suggested, that the collision was due to criminal neglect on the part of defendant; hence, so far as shown by the record, no crime was committed. * * * Whatever might be the effect in the case of a collision due to criminal negligence of a party, suffice it to say that in the case at bar, since no crime was committed, the constitutional provision could have no application, and in such case the constitutional rights of defendant could not be infringed by exacting the information required by the statute." People v. Diller (California Court of Appeal) 142 Pacific Reporter 797.

Dynamite Conspiracy Case.—Thirty members of a labor union were indicted and convicted, in the federal District Court for the District of Indiana, of conspiracy to commit a crime against the

United States, and of aiding and abetting the transportation of dynamite and nitro-glycerine in interstate commerce, in passenger trains and cars between different states of the United States, in violation of the federal statutes, to be used in blowing up buildings and works constructed by "open shop" concerns. On appeal to the United States Circuit Court of Appeals in Ryan *v.* United States, 216 Federal Reporter, 13, the judgment was reversed as to some defendants and affirmed as to others. One of the peculiar holdings in the case related to the admissibility of evidence, and was to the effect that evidence of a chain of explosions throughout the United States, alleged to have occurred by means of dynamite and nitro-glycerine, while admissible as circumstantial evidence to support the charges specified in the indictments, should be limited to that purpose, since the offenses involved in the explosions themselves were offenses against and punishable only under the laws of the states and by the state courts.

Constitutionality of the Iowa "Blue Sky Law."—A suit was brought in the United States District Court for the Southern District of Iowa (William R. Compton Co. *v.* Allen, 216 Federal, 537) against the Secretary of State and Attorney General to restrain the enforcement of the "Blue Sky Law" enacted by the 35th General Assembly. Plaintiff alleged that the law was unconstitutional in that (1) it violated the fourteenth amendment by depriving persons of property without due process of law and denied the equal protection of the law; (2) that it imposed a burden upon interstate commerce; (3) that it granted privileges to citizens of Iowa denied to citizens of sister states. The court, in a somewhat summary manner, disposed of the case by holding that stock, bonds, and other securities were subjects of interstate commerce, and that the act by requiring investment companies to submit their business methods to examination, by requiring a certificate and a filing fee before being allowed to transact business in Iowa, imposed a burden upon interstate commerce. The court further held that the measure could not be sustained as an inspection act. Other grounds urged against the law were disposed of in a summary manner or left undecided.

An Election Tangle.—State ex rel. Maxson *v.* Brodigan (Supreme Court of Nevada) 143 Pacific Reporter, 386, presents a rather amusing election tangle. In the words of the court: "Late in the day or night of Saturday, August 1, 1914, which was the last day for filing nomination papers, McKay and Raymond A. Gott each filed his nomination paper for the Republican nomination for the office of attorney general, and paid the filing fee of $100. On the following Monday, August 3d., Gott filed with the secretary of state his pur-