

### Medico-Legal Note.

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#### REX *v.* FRANK AMOS ZEALLEY.

THIS case was tried at Worcester Assizes, on October 21, 1924, before Mr. Justice Lush. The offence charged was that of gross indecency with a male person on June 8. The prisoner pleaded "guilty."

Dr. Gilbert Scott, of Malvern, gave evidence on behalf of the defence. Having briefly outlined the Freudian theory of the development of the sex instinct, and of its possible "fixations," he stated that, since the offence, he had been treating the prisoner by psycho-analysis. There had already been improvement in the prisoner's mental condition, but Dr. Scott expected that the treatment would extend over two years. On this evidence the prisoner was "bound over," he undertaking to continue under Dr. Scott's treatment.

The case is of interest as indicating that courts are beginning to recognize that persons who commit offences of this kind are proper subjects for psychological treatment rather than legal punishment. Further, it is one of the first cases in which treatment by psycho-analysis has been definitely mentioned in, and accepted by, a British court.

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### Occasional Note.

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#### *The Royal Commission on Lunacy and Mental Disorders (England and Wales).*

THE subject which occupied most attention at the Quarterly General Meeting held on November 20, 1924, was the terms of the evidence to be tendered to the Royal Commission now sitting at 5, Old Palace Yard, Westminster, under the Chairmanship of the Rt. Hon. Hugh Macmillan, *K.C.*

The Committee of the Association appointed at the Annual Meeting in July, 1924, to prepare a *précis* of evidence which would embody the views of the Association as a whole and not of any