

1. Record Nr.	UNINA9910972931103321
Titolo	Homicide law in comparative perspective / edited by Jeremy Horder
Pubbl/distr/stampa	Oxford ; Portland, Oregon, : Hart Publishing, 2007
ISBN	9781282077201 (electronic bk.) 9781847313850
Edizione	[1st ed.]
Descrizione fisica	1 online resource (264 p.)
Collana	The criminal law library ; v. 6
Disciplina	345.0252
Soggetti	Homicide
Lingua di pubblicazione	Inglese
Formato	Materiale a stampa
Livello bibliografico	Monografia
Note generali	Description based upon print version of record.
Nota di bibliografia	Includes bibliographical references and index
Nota di contenuto	Comparative issues in the law of homicide / Jeremy Horder and David Hughes -- The changing face of the law of homicide / Jeremy Horder -- Intentional killings in French law / J.R. Spencer -- Intentional killings : the German law / Antje du Bois-Pedain -- Two models of murder : patterns of criminalisation in the United States / Claire Finklestein -- Murder and related issues : an analysis of the law in Canada / Winifred Holland -- Recklessness and moral desiccation in the Australian law of murder / Ian Leader-Elliott -- The Scots law of murder / Victor Tadros -- Fault for homicide in Singapore / Stanley Yeo 1. Comparative Issues in the Law of Homicide -- JEREMY HORDER AND DAVID HUGHES -- 2. The Changing Face of the Law of Homicide -- JEREMY HORDER -- 3. Intentional Killings in French Law -- JR SPENCER -- 4. Intentional Killings: The German Law -- ANTJE DU BOIS-PEDAIN -- 5. Two Models of Murder: Patterns of Criminalisation in the United States -- CLAIRE FINKELSTEIN -- 6. Murder and Related Issues: An Analysis of the Law in Canada -- WINIFRED HOLLAND -- 7. Recklessness and Moral Desiccation in the Australian Law of Murder -- IAN LEADER-ELLIOTT -- 8. The Scots Law of Murder -- VICTOR TADROS -- 9. Fault for Homicide in Singapore -- STANLEY YEO
Sommario/riassunto	A number of jurisdictions world-wide have changed or are considering changing their homicide laws. Important changes have now been recommended for England and Wales, and these changes are an important focus in the book, which brings together leading experts from jurisdictions across the globe (England and Wales; France;

Germany; Scotland; Australia; The United States of America; Canada; Singapore and Malaysia) to examine key aspects of the law of homicide. Key areas examined include the structure of the law of homicide and the meaning of fault elements. For example, the definition of murder, or its equivalent, is very different in France and Germany from the definition used in England and Wales. French law, like the law in a number of American states, ties the definition of murder to the presence or absence of premeditation, unlike the law in England and Wales. Unlike most other jurisdictions, German law makes the killer's motive, such as a sadistic sexual motive, relevant to whether or not he or she committed the worst kind of homicide. England and Wales is in a minority of English-speaking jurisdictions in that it does not employ the concept of 'wicked' recklessness, or of extreme indifference, as a fault element in homicide. Understanding these often subtle differences between the approaches of different jurisdictions to the definition of homicide is an essential aspect of the law reform process, and of legal study and scholarship in the criminal law. Every jurisdiction tries to learn from the experience of others, and this book seeks to make a contribution to that process, as well as providing a lively and informative resource for scholars and students
