Bellingham, the Assassin of Spencer Perceval: A Case of Delusional Disorder and a Missed Opportunity for Legal Reform

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In May 1812, Spencer Perceval became the only British Prime Minister to be assassinated. His murderer, John Bellingham, was executed after a rushed trial and a failed insanity defence. In this article, the writer examines the case, concludes that Bellingham was subject to a mental disorder and speculates whether the case would have preceded the landmark M’Naghten decision by some 30 years had it not been for political imperatives.

Key Words: assassination; Bellingham; John; delusional disorder; history of psychiatry; insanity; murder; Perceval; Spencer.

Introduction

On the evening of 11 May 1812, as Spencer Perceval, the extremely popular prime minister, entered the lobby of the House of Commons, a man stepped forward, drew a pistol and shot him in the chest. Perceval fell to the floor after uttering something that was variously heard as ‘murder’ or ‘oh my God’. They were his last words. By the time he had been carried into an adjoining room and propped up on a table, he was unconscious. When a surgeon arrived a few minutes later, Perceval was declared dead. The assassin, John Bellingham, calmly sat on a bench and was arrested.¹ When asked the reason for the act, Bellingham replied: ‘Want of redress, and denial of justice’.²

Early Life

John Bellingham was born in London around 1771, the second child of the marriage. His mother came from a prosperous family in St Neots, Huntingdonshire. His father, John

Bellingham, was an artist who achieved some small success as a painter of miniature portraits. In early 1770, Bellingham Senior began to show signs of mental illness. The Bellinghams moved back to St Neots in 1775 when John Bellingham was about four years old, presumably to be supported by his mother’s family. Bellingham Senior was confined as a ‘pauper lunatic’ in St Luke’s charitable asylum in 1780. Eventually he was discharged as incurable and died in London in 1781.

Bellingham was described as an average, though diligent, student. At 15 years of age, Bellingham was found a post as an apprentice goldsmith by his uncle William Daw. Bellingham left the post within a few weeks. Within less than a year, William Daw bought Bellingham a cadetship in the East India Company. Bellingham resigned from the post after the ship carrying him out to India was wrecked on rocks in the Azores, and he escaped in an open boat. Daw then helped him a third time by setting him up as a ‘tin-plate’ worker in London’s Oxford Street. When this

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retail business burned down in a fire in 1794, Bellingham declared bankruptcy. 'It was believed that he set fire to the house but could not be proven'.² Bellingham then apprenticed himself to an accountant. He prospered in the firm and in 1800 was sent to Archangel, Russia, to supervise the Baltic side of the operation. He returned to London in 1801.

In 1801, when he was 30 years old, Bellingham moved to Liverpool. He had no contacts in the city but met and married 19-year-old Mary Neville. A child was born within a year. He went to work using his accounting skills for a company that specialised in trade with Ireland. His mother died in 1802. In 1803, Bellingham gave up the Irish business and returned to Archangel acting as an export representative for a group of Liverpool timber traders. He chose as a contact a Dutchman called Conrad Dorbecker, who would go on to play a prominent role in Bellingham's fate. However, this initial business transaction was profitable, and he returned to Liverpool.

The Russian Affair

Bellingham decided to undertake a second venture, as a principal in partnership with Dorbecker. In May 1804, he sailed, with his wife and young son, for Archangel. In autumn 1803, a Russian merchant ship was lost at sea. Her owner, a Van Brien, filed an insurance claim, but an anonymous letter was sent to Lloyd's, alleging the ship had been sabotaged. Van Brien believed Bellingham to be the author and retaliated by accusing him of a debt of 4890 rubles. Bellingham, about to return to Britain on 16 November 1804, had his travelling pass withdrawn because of the alleged debt. Bellingham accused Dorbecker, an associate of Van Brien, of being the author of the anonymous letter.

Van Brien persuaded the local governor-general to imprison Bellingham. Arbitration followed but Bellingham refused to make a compromise payment, which was less than

half of that claimed, stating that it was a matter of principle. One year later, Bellingham secured his release and went to Saint Petersburg, where he attempted to impeach the Russian governor-general. This so angered the Russian authorities that they charged him with leaving Archangel in a clandestine manner. He was again imprisoned until October 1808, when he was put out onto the streets, but still without permission to leave. He approached the British consulate on a number of occasions, but the British Ambassador refused to intervene, as he regarded it as a civil matter. In desperation, he petitioned the Tsar. He was allowed to leave Russia in 1809, arriving in England in December, virtually destitute. His wife, pregnant with the second child, had left Russia in early 1808, returning to Liverpool and setting up a successful millinery business.

Period after the Return from Russia

On 24 December 1809, Bellingham returned to London and arrived at the house of a cousin, Ann Billet, whom he had not seen for some years. He remained with her until after Christmas, then moved into lodgings. Billet continued to see him over the following four months, describing him as 'almost manic'.¹ During the first months of 1810, he hurled himself into a furious round of petitions and visits to government offices in an attempt to gain compensation for his losses in the Russian venture. He informed people that he was entitled to more than a hundred thousand pounds and intended to buy property when this was realised.

In February 1810, Mrs Bellingham, in response to a letter she had received from Bellingham, joined him in London. Both Mary Bellingham and Ann Billet then proceeded to accompany him on numerous visits to government offices where he demanded redress. The Foreign Office maintained it was a civil matter and not within the purview of government. Each woman quickly came to the conclusion that this was a lost cause. Mrs Bellingham,

urging him to drop the matter, returned to Liverpool and considered ending the marriage. Bellingham persisted in his petitions to the Treasury, the Prince Regent and the Privy Council. In early May 1810, Bellingham personally went to Downing Street where he gave Spencer Perceval's private secretary, Michael Herries, a document for the Prime Minister. He asked that he be allowed to present his petition to Parliament. Bellingham returned to Downing Street on 22 May, when Herries told him Mr Perceval could not authorise the introduction of the petition.

Bellingham returned to Liverpool in December 1810 and rejoined his wife, having promised that he would abandon his suit. He attempted to revive his former Irish trade and took on a partner. He travelled at least once to Ireland to re-establish links, but business was poor, and the family was sustained mainly by his wife's trade. In the second half of 1811, Mrs Bellingham's business began to experience a significant downturn in profits as a result of a national economic depression.

The Five Months Leading up to the Assassination

An error in an order for ribbons for his wife's business was the pretext for Bellingham returning to London on 27 December 1811, ostensibly to negotiate with the supplier. He was only supposed to be away for a short period, and his wife wrote him increasingly concerned letters requesting his return. After a month, his wife accidentally discovered a note referring to a petition asking for compensation for the Russian losses that he was intending to present to the Prince Regent. She concluded that he had broken his promise to her and that the trip to London was planned under false pretenses.

On arrival in London, Bellingham took lodgings with a Mrs Rebecca Robart, where he remained until the time of the murder. Bellingham renewed his attempts to win compensation, again petitioning various persons and agencies, including the Prince Regent, the

Privy Council, the Treasury and his local Member of Parliament, requesting leave to present his grievance to Parliament. About mid-March 1812, he wrote a letter to Mr Read, magistrate of Bow street:

The purport of the present, is, therefore once more to solicit his Majesty's Ministers, through your medium, to let what is right and proper be done in my instance, which is all I require. Should this reasonable request be finally denied, I shall then feel myself justified in executing justice myself, in which case I shall be ready to argue the merits of so reluctant a measure with his Majesty's Attorney General, wherever and whenever I may be called upon so to do; in the hopes of averting so abhorrent but compulsive an alternative.³

On 18 April 1812, he went to the Foreign Office, where a civil servant told him he was at liberty to take 'whatever measures he thought proper'.³ On 20 April 1812, Bellingham purchased two pistols from a gunsmith. He also had a tailor sew an inside pocket to his coat, in order to conceal the weapons. He was then often seen in the lobby of Parliament.

After taking Mrs Robart and her young son to a painting exhibition on 11 May 1813, Bellingham remarked that he had some business to attend to. He made his way to Parliament, where he waited in the lobby. When Prime Minister Spencer Perceval appeared, Bellingham stepped forward and shot him dead.

Trial and Aftermath

John Bellingham was tried on 15 May 1813 at the Old Bailey, where he argued that he would have preferred to shoot the British Ambassador to Russia, but insisted that, as a wronged man, he was justified in killing the representative of his oppressors. He made a rambling pedantic formal statement to the court, detailing his grievances and the steps he had taken to achieve remedy.

On my return in England I laid a statement of my grievances before the Marquis

Wellesley, accompanied by authentic documents, and claiming some redress for the injuries I had sustained through the British minister in Russia, which injuries it was impossible I should have suffered, if they had not been sanctioned by that minister.

A refusal of justice was the sole cause of this fatal catastrophe; his Majesty's ministers have now to reflect upon their conduct for what has happened.

Recollect, Gentlemen, what was my situation. Recollect that my family was ruined and myself destroyed, merely because it was Mr Perceval's pleasure that justice should not be granted; sheltering himself behind the imagined security of his station, and trampling upon law and right in the belief that no retribution could reach him. I demand only my right, and not a favour; I demand what is the birth-right and privilege of every Englishman. Gentlemen, when a minister sets himself above the laws, as Mr Perceval did, he does it as his own personal risk. If this were not so, the mere will of the minister would become the law, and what would then become of your liberties? I trust that this serious lesson will operate as a warning to all future ministers, and that they will henceforth do the thing that is right, for if the upper ranks of society are permitted to act wrong with impunity, the inferior ramifications will soon become wholly corrupted.

I disclaim all personal or intentional malice against Mr. Perceval.

Evidence was presented that Bellingham was insane. Evidence was given by Ann Billett:

He has been more than three years in a state of derangement, and since he has been in London he has been pursuing the same plan, and for a long time before that. When he was in Russia when he was pursuing the same object as soon as he returned home all his friends were well convinced that was the case.

He was in a deranged state when any thing of this was mentioned to him. I did not

mention it to him because of the state of mind he was in.

I would wish to mention one circumstance which strongly confirmed me in my opinion, and a strong mark of insanity. Two years ago last Christmas he had been telling me of his great schemes that he had pursued, he said that he had realized more than an hundred thousand pounds, with which he intended to buy an estate in the west of England, and to take a house in London; I asked him where the money was, he said he had not got the money, but it was the same as if he had; for that he had gained his cause in Russia, and our government must make it good to him.

He repeatedly said to me and to his wife that this was assuredly the fact.

Other witnesses were called, who deposed to similar facts and to their belief that Bellingham was insane.³

The evidence of insanity was discounted by the trial judge, Lord Chief Justice James Mansfield who, in his final address to the jury, said:

In another part of the prisoner's defense, which was not, however, urged by himself, it was attempted to be proved, that at the time of the commission of the crime he was insane. With respect to this the law was extremely clear: if a man was deprived of all power of reasoning, so as not to be able to distinguish whether it was right or wrong to commit the most wicked, or the most innocent transaction, he could not certainly commit an act against the law; such a man, so destitute of all power of judgment, could have no intention at all. In order to support this defense, it ought to be proved by the most distinct and unquestionable evidence, that the criminal was incapable of judging between right or wrong. There was no

other proof of insanity which would excuse murder, or any other crime.

There is a third species of insanity, in which the patient fancied the existence of injury, and sought an opportunity of gratifying revenge, by some hostile act; if such a person was capable, in other respects, of distinguishing right from wrong, there is no excuse for any act of atrocity which he might commit under this description of derangement. The witnesses who had been called to support this extraordinary defense had given a very singular account to show that, at the commission of the crime, the prisoner was insane. What might have been the state of his mind some time ago was perfectly immaterial. The single question is, whether at the time this fact was committed, he possessed a sufficient degree of understanding to distinguish good from evil, right from wrong, and whether murder was a crime not only against the law of God, but against the law of his country. Here it appears that the prisoner had gone out like another man; that he came up to London by himself, at Christmas last, that he was under no restraint, that no medical man had attended him to cure his malady, that he was perfectly regular in all his habits, in short there was no proof adduced to show that his understanding was so deranged, as not to enable him to know that murder was a crime. On the contrary, the testimony adduced in his defense, has most distinctly proved, from a description of his general demeanor, that he was in every respect a full and competent judge of all his actions.

His Lordship concluded by advising the jury to take all the facts into their most serious consideration: 'If you have any doubt, you will give the prisoner the benefit of that doubt; but if you conceive him guilty of the crime alleged against him, in that case you will find

him guilty'. The jury retired to consider their verdict. 'As they passed out, the prisoner regarded them separately with a look of mingled confidence and complacency'.³

The jury returned after 14 minutes. Bellingham was found guilty and sentenced to death. The sentence was carried out in public three days later. Bellingham maintained the rightfulness of his actions to the last, writing to his wife on the night before his execution: 'with the purest of intentions, it has been my misfortune to be thwarted, misrepresented and ill-used in life. I lost my suit solely through improper conduct. ... Otherwise I must surely be acquitted'.⁴

Daniel Wilson, a parish priest, visited Bellingham on the night before his execution to offer comfort. Wilson wrote: 'he then proceeded so far in justifying himself, almost to represent himself as an instrument executing the justice of God'.

On the night before his execution, Bellingham wrote: 'I lost my suit solely through the improper conduct of my attorney and counsel, Mr Alley, in not bringing my witnesses forward (of whom there were more than twenty): in consequence, the judge took advantage of the circumstance, and I went on the defence without having brought forward a single friend – otherwise I must inevitably have been acquitted'.³

Discussion

Bellingham presented with features of a delusional disorder, persecutory type. The essential feature of delusional disorder is the presence of one or more non-bizarre delusions; that is, that the beliefs are plausible but invalid. The onset of a delusional disorder is generally middle or late adulthood, and persecutory type is the most common subtype. The onset of Bellingham's disorder is uncertain, but 'his relatives were of the opinion that his mind was unsound in Russia'.¹ Bellingham may be described as having querulous paranoia, which is included as a subtype under delusional disorder, persecutory type in DSM-5.⁵

Bellingham manifested a pattern of behaviour involving the unusually persistent pursuit of a personal grievance in a manner seriously damaging to his economic, social and personal interests and disruptive to the functioning of agencies attempting to resolve the claims.⁶ This behaviour was driven by Bellingham's belief that his basic civil rights had been breached. The idea was delusionally based, as it was false, fixed and irrational and had evolved into a quest for justice, involving not only acknowledgement by the Executive of the wrongness of the perceived index episode but also for the additional injustices he had suffered while attempting to obtain a remedy; behaviour that is well described in persistent litigants.^{7,8,9,10,11} To this end, Bellingham also petitioned prominent people such as politicians. Finally, Bellingham resorted to violence in order to further his cause. He conceived the idea of killing in order to gain access to a court and jury where he would be heard, and a jury of his peers would have no option but to acquit him and acknowledge his grievance. 'I have taken the only possible alternative to bring the affair to a public investigation, for the purpose of being enabled to return to the bosom of my family with some degree of comfort and honour'.³ On the day before the trial, 'he spoke of the result of his trial with the utmost confidence, and on his being asked whether he had any commands to his wife at Liverpool, he declared that he had not, and that in a day or two he should join her in that city'.³ His motives became political and advanced to a higher cause than simply financial gain. His letter to the magistrates at Bow Street after his conviction described this eloquently:

Had I murdered him in cold blood, I should consider myself a monster, not only unfit in this world but too wicked for all the torment that might afflict me in the next. I had no personal or premeditated malice towards that gentleman; the unfortunate lot had fallen upon him as the leading member of that administration which had repeatedly

refused me any reparation for the unparalleled injuries I had sustained in Russia.³

Bellingham had manifested a gradual but significant social decline as a result of mental disorder. His campaign had expanded to incorporate increasingly wider issues, together with the accretion of more and more agents purportedly responsible. His mental state was dominated by apparently unshakeable beliefs around the justice of his grievances, the wide social import of his pursuit of justice and the organised malevolent opposition he faced. He retained a certainty of total victory. He was plausible in his presentation, but presented his grievances in pedantic detail with only superficial rationality. He sent out warnings, which were misunderstood or ignored. This behaviour is consistent with recent studies of similar offenders.^{12,13}

Henry de Bracton, the Chief Justice of the highest court in England, authored *The Laws and Customs of England* in 1256 and was himself identified with the so-called wild beast test for insanity and nonresponsibility for criminal acts. He wrote: 'The insane, like animals [brutus] were not capable of forming the requisite intent [mens rea] to commit crime [actus reus], much as a child would be incapable of forming such intent'.¹⁴ Tests for exculpatory insanity followed. In England, the wild beast test was anticipated in *R v Arnold* (1724),¹⁵ in which Justice Tracy held that in order to escape punishment for a crime, the defendant had to have the lack of understanding akin to that of a wild beast. It was used unsuccessfully in *R v Ferrers* (1760)¹⁶ and incorporated the current concepts of a delusion as part of a disease process in *R v Hadfield* (1800).¹⁷ It had been remarked that the key difference in the cases was that Ferrers represented himself while Hadfield had an excellent defence counsel.¹⁹ Two strands of the 'right and wrong' and 'mental disease or defect' tests were brought together in the landmark *R v M'Naghten* case in 1843.^{18,19} That case remains the current basis for the insanity defence in most Anglo-American jurisdictions.²⁰

The modern foundation for the insanity defence was put in place during the first half of the nineteenth century, between the years 1800 and 1843.²¹ During this brief period, the reaction to the acquittals by reason of insanity of James Hadfield (1800) and Daniel M'Naghten (1843) shaped the present function and administration of the insanity defence in the Anglo-American world.²² In the case of Hadfield, the reaction of the House of Commons to his acquittal led to the passage of the automatic confinement statutes that now accompany a successful plea of insanity in most jurisdictions.¹⁷ The case of Bellingham came in between these two landmark cases. The issue of insanity was raised by Bellingham but effectively dismissed by the trial judge. This may have been driven by the unprecedented popularity of the Prime Minister and public pressure for the imposition of suitable punishment for such a heinous act. Commentators have also pointed out that the speed and efficiency with which the M'Naghten defence was organised suggests that a number of powerful people in law and medicine were waiting for an opportunity to bring about changes in the law on criminal insanity.²³ Therefore, lack of skilled representation, an unfavourable political climate and a lack of reforming zeal may have doomed Bellingham: otherwise the world may have been speaking of the Bellingham, rather than the M'Naghten rule. Would Bellingham be found not guilty by reason of insanity today? Perhaps 200 years on, it is still dependent on the quality of the representation that is available.

Declaration of conflicts of interest

Kyros C. Karayiannis has declared no conflict of interest.

Ethical approval

This article does not contain any studies with human participants or animals performed by any of the authors.

Ethical standards

Studies with no human participants.

Notes

1. *R v John Bellingham*, Old Bailey. 13 May 1812. Available from: URL: <https://www.oldbaileyonline.org/browse.jsp?div=t18120513-5>.
2. Wilson D. The substance of a conversation with John Bellingham, the assassin of the late Right Hon. Spencer Perceval. Wentworth Press; 2016.
3. Newgate Calendar 1812. John Bellingham: executed for the murder of the Right Honourable Spencer Perceval, Chancellor of the Exchequer, by shooting him in the House of Commons, in May, 1812.
4. Pillet RM. Views of England, during a residence of ten years; six of them as a prisoner. 1816.
5. American Psychiatric Association. Diagnostic and statistical manual of mental disorders. 5th ed. Arlington, VA; 2013.
6. Jaspers K. General psychopathology. 1923. English translation by Hoenig J, Hamilton MW. Manchester: Manchester University Press; 1963.
7. Freckelton I. Querulent paranoia and the vexatious complainant. *Int J Law and Psychiatry* 1988;11:127–43.
8. Mullen PE, Lester G. Vexatious litigants and unusually persistent complainants and petitioners: from querulous paranoia to querulous behaviour. *Behav Sci Law. Special issue: international perspectives on delusional disorders and the law* 2006;24(3):333–49. Publisher: John Wiley & Sons.
9. Rowlands MW. Psychiatric and legal aspects of persistent litigation. *Br J Psychiatry* 1988;153:317–23.
10. Goldstein RL. Paranoids in the legal system: the litigious paranoid and the paranoid criminal. *Psychiatric clinics of North America* 1995;18:303–15.
11. Lester G, Wilson B, Griffin L, Mullen PE. Unusually persistent complainants. *Br J Psychiatry* 2004;184:352–56.
12. James DV, Mullen PE, Meloy JR et al. The role of mental disorder in attacks on European politicians 1990–2004. *Acta Psychiatr Scand* 2007;116(5):334–44.
13. Mullen PE, Pathé M, Purcell R, Stuart GW. Study of stalkers. *Am J Psychiatr* 1999;156:8.
14. Prosono M. History of forensic psychiatry. In: Rosner R, editor. *Principles and*

- practice of forensic psychiatry. 2nd ed. Taylor & Francis; 2003.
15. *Rex v Arnold* 16 How. St. Tr. 695 (1724).
 16. *Rex v Ferrers* 20 How. St. Tr. 342 (1760).
 17. An act for the safe custody of insane persons charged with offences (Criminal Lunatics Act of 1800) 39 & 40 Geo. 3, c. 94 (1800).
 18. Moran R. The origin of insanity as a special verdict: the trial for treason of James Hadfield. *Law Soc Rev* 1985;19(3):487–521.
 19. Eigen J, Andoll G. From mad-doctor to forensic witness: the evolution of early English court psychiatry. *Int J Law Psychiatr* 1986;9:159–69.
 20. Law & Society Review. Special Issue: historical and longitudinal studies 1985;19(3):487–519. Publisher: Blackwell Publishing.
 21. Gottschalk JA. Review of examinations of criminal responsibility: foundations in mental health case law. *J Psychiatr Law* 2009;37(1):93–95. Publisher: Federal Legal Communications.
 22. O'Reilly-Flemming T. From beasts to Bedlam: Hadfield, the regency crisis, M'Naghten and the 'mad' business in Britain, 1788–1843. *J Psychiatr Law* 1992;20(2):167–90. Publisher: Federal Legal Communication.
 23. Ormrod R. The McNaughton case and its predecessors. In: West DJ, Walk A, editors. *Daniel McNaughton: his trial and the aftermath*. Gaskell Books; 1977:4–11.