

Roles and Challenges of Legal Officials During King Chǒngjo's Reign

Abstract

This study reexamines the roles and challenges of legal officials within the judicial system during the reign of King Chǒngjo (r. 1776-1800). Despite their minor status in the bureaucratic hierarchy, legal officials played a crucial role as intermediaries in applying the law, including interpreting statutes, drafting legal documents, and advising on judicial matters. However, their specific duties and responsibilities within the judicial system have been largely unexplored. To address this gap, this study focuses on King Chǒngjo's reign, which provides a particularly rich body of judicial records concerning legal officials. Among these are twenty-seven documented cases in which legal officials were disciplined for failing to fulfill their duties. These cases offer a unique opportunity to examine the expectations placed on legal officials and the specific roles they were required to perform. By analyzing the legal regulations outlining the status and responsibilities of legal officials, as well as the twenty-seven cases in which they faced severe punishment for inadequate performance, this paper brings the overlooked presence of legal officials to the forefront of legal history research.

Key Words: legal officials, King Chǒngjo, Chosŏn Dynasty, judicial system, legal history

Introduction

This study reexamines the roles and challenges of *yulgwān* (律官, hereafter referred to as legal officials) within the judicial system during the reign of King Chǒngjo (r. 1776-1800).¹ Despite their seemingly minor bureaucratic status, legal officials served as key intermediaries in the application of law, including interpreting statutes, drafting legal documents, and advising on judicial matters. As earlier studies on Chosŏn legal history have focused primarily on high-ranking officials or institutional reforms, the roles and experiences of legal officials have remained almost underexplored.²

Studies, such as Yi Namhŭi's research on the legal status of legal officials in early

¹ In *Veritable Records of the Chosŏn Dynasty* (*Chosŏn wangjo sillok*, 朝鮮王朝實錄), legal officials are referred to as *yulja* (律者), *yurwŏn* (律員), and *yurhak* (律學). The "legal officials" examined in this study refer to lower-ranking bureaucrats selected through state examinations, distinguishing them from "legal clerks" (*hyŏngbang ajŏn* 刑房衙前), who held hereditary positions at the magistrate level.

² Studies, including those by Jisoo Kim, Jungwon Kim, and Sunjoo Kim, challenge the conventional belief that Confucian societies avoided legal processes, highlighting the development of legal culture in 18th-century Chosŏn. However, while these works focus on the interactions between ordinary people and the legal system, the hidden roles and contributions of legal officials in fostering this legal development remain largely unexplored. Jisoo Kim, *The Emotions of Justice*; Jungwon Kim, "Inscribing Grievances, Litigation, and Local Community in Eighteenth-Century Korea;" Jungwon Kim and Sunjoo Kim, *Wrongful Deaths*.

Chosŏn and Na Yŏnghun's analysis on social networks among successful candidates for legal official positions in late Chosŏn, have clarified the institutional status and social positions of legal officials.³ However, their specific duties and responsibilities within the judicial system remain largely underexplored. To address this gap, this study turns to the reign of King Chŏngjo, due to its unusually rich body of judicial records concerning legal officials. Among these are twenty-seven documented cases of legal officials facing disciplinary action for failing to fulfill their responsibilities. These cases provide a unique lens to examine the expectations placed on legal officials and the specific roles required of them.

King Chŏngjo's ambitious legal reforms, emphasizing codification, rigorous judicial procedures, and the prevention of wrongful convictions, highlight his commitment to justice and precision in governance.⁴ As part of these reforms, King Chŏngjo meticulously reviewed judicial proceedings and pinpointed the responsibilities of legal officials. While earlier perceptions dismissed legal officials as unrefined bureaucrats performing mechanical tasks,⁵ King Chŏngjo repeatedly emphasized their critical role in maintaining judicial integrity. His resolute approach to holding legal officials accountable, especially in contrast to his relative leniency toward higher-ranking officials, highlights both the importance of their tasks and the heightened scrutiny they faced. To fully understand their roles and the challenges they encountered, analyzing the judicial cases from King Chŏngjo's reign offers evidence of the expectations placed on legal officials and the difficulties they faced in conforming to them.

Therefore, this paper first delves into how legal regulations outlined the status and responsibilities of legal officials. Second, building upon those regulations, this paper analyzes the twenty-seven cases where legal officials faced severe punishment for their inadequate fulfillment of legal affairs, focusing on what kinds of roles were expected of them and why they were punished. Throughout these analyses, this paper brings the largely overlooked

³ There are only three individual studies on legal officials, each focusing on a different period and emphasizing distinct aspects of their status. Yi Misuk, "*Koryŏ sidae yulgwannŭi soime kwanhan ilgoch'al*," 194; Yi Namhŭi. "*Chosŏn chŏn'giŭi yulgan*," 341-353; Na Yŏnghun, "*Chosŏn hugi yulgwaipkyŏkchaŭi ch'injok net'ŭwŏk'ŭgwa kyŏlsok*," 136-146. However, these studies primarily focus on the institutional status of legal officials as outlined in legal codes, without examining the specific expectations placed on them or the practical roles they carried out in concrete historical contexts during the late Chosŏn period.

⁴ For more on this perspective, see Kim Paekch'ŏl, *T'angp'yŏng sidae pŏpch'ijuŭi yusan*; Kim Ho, *Chŏngjoŭi pŏpch'i*. For the contradictory aspects of King Chŏngjo's emphasis on the rule of law, Yi Hagyŏng, "*Chosŏn hugi wangkwa wangbŏp*."

⁵ For example, Pak Pyŏnggho exhibits a deep-seated contempt for low-ranking legal officials within the Confucian culture of the Chosŏn dynasty. He portrays their legal knowledge as the result of mere repetitive practices rather than structured education or training. From his view, the role of legal officials in identifying legal provisions and enforcing penalties was seen as trivial, a routine process that carried little weight in judicial decisions. Moreover, legal officials were seen as easily inclined to 'manipulate' outcomes, further highlighting Pak's negative view of their role in the judicial system. Pak Pyŏnggho, *Kŭnseŭi pŏpkwa pŏpsasang* 294-295. This criticism by Pak aligns with M. Weber's critique of the legal culture in Confucian societies, which highlights the lack of a systematic approach to legal education and the absence of a professional legal class. This perspective has contributed to a persistent negative perception of Chosŏn Dynasty's legal culture, including enduring biases against the legal professionals of that time. For Weber's criticism and its response, see Marsh, Rober "Weber's Misunderstanding of Traditional Chinese Law."

presence of the legal officials to the forefront of legal history research.⁶

Historical Context and Status of Legal Officials in Chosŏn's Judicial System

The term "yulgwan" (律官, legal officials) refers to an official (gwan 官) responsible for overseeing legal statutes (yul 律). The origins of legal officials can be traced back to the Three Kingdoms period (early 4th century to mid-7th century), the earliest period known for using legal codes in Korea.⁷ Their formal appointments by the State began in the early Koryŏ period (918-1392), marking the institutionalization of their roles within the judicial system.⁸ While detailed information about legal officials from these early periods is scarce and a comprehensive examination of their origins is beyond the scope of this study, it is nonetheless important to note two key aspects regarding their development.⁹

First, the early Chosŏn policy of dispatching legal officials from the central government to the provinces was directly influenced by similar practices from the Koryŏ period.¹⁰ In 1404, the State Council (Ŭijŏngbu 議政府) raised concerns about the lack of legal officials in the provinces, highlighting the issues this absence caused in maintaining judicial standards.¹¹ In response, discussions emerged around reinstating the practice from the Koryŏ era, where legal officials were dispatched to the provinces to uphold justice. These debates emphasized the need to reintroduce such a system or establish a provincial legal education framework to address the administrative challenges effectively. Consequently, Chosŏn decided to adopt this approach, aligning its policies with Koryŏ's practice of utilizing legal officials to strengthen judicial oversight and ensure fair governance across the country. This demonstrates a continuity in the administrative approach to legal governance between the two dynasties.

Second, under the Chosŏn Dynasty's bureaucratic system, the status of legal officials was relatively lower, and their conditions were more constrained compared to their Koryŏ

⁶ In the study of Korean legal history, research on legal experts is still in its early stages, whereas studies on litigation masters and private legal advisors in Ming and Qing China have revealed their crucial roles in managing lawsuits and judicial cases in local provinces. The different presence and functions of legal experts in pre-modern Korea and China, despite their shared Confucian culture, pose an important topic for future research. For more information on Chinese legal professionals, see Macauley, Melissa. *Social Power and Legal Culture: Litigation Masters in Late Imperial China*; Susumu, Fuma. "Litigation Masters and the Litigation Systems of Ming and Qing China"; Chen, Li. "Regulating Private Legal Specialists and the Limits of Imperial Power in Qing China," "Legal Specialists and Judicial Administration in Late Imperial China, 1651–1911."

⁷ Yi Misuk, "Koryŏsidae yulgwanŭi soime kwanhan ilgoch'al" 196.

⁸ For more detailed information on the early legal officials, see Yi Misuk, "Koryŏsidae yulgwanŭi soime kwanhan ilgoch'al."

⁹ For more comparative information between Koryŏ and Chosŏn legal history, see Pak Pyŏngho, *Han'guk pŏpchesa*. 35-72.

¹⁰ For information on the establishment of legal studies and the initiation of legal education in early Chosŏn, see *T'aejong sillok*, 4: 1393/10/27.

¹¹ *T'aejong sillok*, 8: 1404/10/28.

counterparts. During the Koryŏ period, the legal officials were known to have received similar treatment to civil officials in terms of economic benefits and enjoyed better treatment compared to other technical officials.¹² However, during the Chosŏn period, the increased emphasis on Confucian ideals, which prioritized Confucian scholars and civil officials, resulted in a decline in the social standing of legal officials. In terms of economic, social, and political status, legal officials in Chosŏn were below civil officials and did not hold a superior position to other technical officials; in many cases, their circumstances were even more precarious. This decline may have contributed to the negative perception of legal officials in Chosŏn Korea.¹³

Status of Legal Officials in Late Chosŏn Korea

The legal officials occupied a lower status within the Chosŏn bureaucracy. First, their affiliation with the Committee of Legal Studies (*Yurhakch'ŏng*, 律學廳), a subsidiary body within the Ministry of Penal Affairs (*Hyŏngjo*, 刑曹), reflects their lower position within the bureaucratic hierarchy (the gray-shaded sections in Table 1). In contrast to other technical officials, who operated from their own independent administrative offices, legal officials did not have an independent branch of their own and were instead tasked with supporting the functions of the Ministry of Penal Affairs.¹⁴ *The Great Code for Administering the Country* (*Kyŏngguk taejŏn* 經國大典, 1485) during the reign of King Sŏngjong (r.1469-1494), first stipulated the regulations regarding legal officials in Chosŏn.¹⁵

[Table 1] Structure and Personnel Changes in the Ministry of Penal Affairs

Personnel	<i>The Great Code for Administering the Country</i> (1485)	<i>The Supplementary Great Code</i> (<i>Soktaejŏn</i> 續大典, 1746)	<i>The Comprehensive Great Code</i> (<i>Taejŏnt'ongp'yŏn</i> 大典通編, 1785)
Judicial Officials	one <i>P'ansŏ</i> (判書 Minister, Sr. 2nd)	one <i>P'ansŏ</i>	one <i>P'ansŏ</i>

¹² In the Chosŏn Dynasty, technical officials were referred to as *chungin* (中人 middle class) who specialized in practical fields like law, medicine, astronomy and interpretation. Yi Misuk, “*Koryŏ sidae yulgwannŭi soime kwanhan ilgoch'al*” 194, 216-221.

¹³ Yi Namhŭi. “*Chosŏn chŏn'giŭi yulgwan*” 341-353 and Na Yŏnghun, “*Chosŏn hugi yulgwaipkyŏkchaŭi ch'injok net'ŭwŏk'ŭgwa kyŏlsok*.” 136-146. For insights into the broader legal traditions of Chosŏn Korea and their centralized, state-driven nature, see Marie Seong-Hak Kim. Kim highlights how the legal system in Chosŏn Korea was shaped by the monarchy, emphasizing state authority over local customary practices. Kim, Marie Seong-Hak, *Law and Custom in Korea: Comparative Legal History*. 13–18, 45–49.

¹⁴ Officials specializing in interpretation worked in the Office of Interpreters (*Sayŏgwŏn*, 司譯院), those in medicine in the Royal Pharmacy (*Naeŭiwŏn*, 內醫院) and the Bureau of Medicine (*Chŏnuigam* 典醫監), and those in astronomy in the Office of Astronomy (*Kwansanggam*, 觀象監), with the heads of these offices being able to rise to the senior third rank.

¹⁵ For information on the status of legal officials before *The Great Code for Administering the Country*, see Yi Namhŭi. “*Chosŏn chŏn'giŭi yulgwan*” 344-346.

		one <i>Ch'amp'an</i> (參判 Second Minister, Jr. 2nd) one <i>Ch'amŭi</i> (參議 Third Minister, Sr. 3rd) four <i>Chōngnang</i> (正郎 Secretary, Sr. 5th) four <i>Chwarang</i> (佐郎 Junior Secretary, Sr. 6th)	one <i>Ch'amp'an</i> one <i>Ch'amŭi</i> three <i>Chōngnang</i> three <i>Chwarang</i>	one <i>Ch'amp'an</i> one <i>Ch'amŭi</i> three <i>Chōngnang</i> three <i>Chwarang</i>
Committee of Legal Studies	Legal Officials	one <i>Kyosu</i> (教授 Instructor, Jr. 6th) two <i>Pyōlje</i> (別提 Assistant Inspector, Jr. 6th) one <i>Myōngnyul</i> (明律 Legal Examiner, Jr. 7th) two <i>Shimnyul</i> (審律 Senior Legal Examiner, Jr. 8th) one <i>Yurhak hundo</i> (律學 訓導 Legal Advisor, Sr. 9th) two <i>Kōmnyul</i> (檢律 Junior Legal Examiner, Jr. 9th)	one <i>Kyosu</i> one <i>Pyōlje</i> one <i>Myōngnyul</i> one <i>Shimnyul</i> one <i>Yurhak hundo</i> one <i>Kōmnyul</i>	one <i>Kyosu</i> one <i>Kyōmgvosu</i> (兼教授 Adjunct Instructor, Jr. 6 th) two <i>Pyōlje</i> one <i>Myōngnyul</i> one <i>Shimnyul</i> one <i>Yurhak hundo</i> one <i>Kōmnyul</i>
	Legal Students	forty <i>yulsaeng</i> (律生 legal students)	eighty <i>yulsaeng</i>	eighty <i>yulsaeng</i>

Table 1 shows the changing composition of the Ministry of Penal Affairs throughout the Chosŏn Dynasty, as reflected in major legal codes. According to *The Great Code for Administering the Country*, the Ministry was primarily managed by judicial officials (*hyōnggwan*, 刑官) comprised of five ranks (from *P'ansŏ* to *Chwarang*). Its subordinate body, the Committee of Legal Studies, consisted of legal officials of six ranks (from *Kyosu* to *Kōmnyul*) and legal students (*yulsaeng*).¹⁶ As indicated in Table 1, this organizational structure remained mostly unchanged throughout the late Chosŏn period, with only minor adjustments to the number and position of officials.

Second, the lower status of legal officials in Chosŏn is evident in both the paths to their positions and their official ranks. Judicial officials were *yangban* bureaucrats who passed the civil service examination (*mun'gwa* 文科) and could hold high-ranking positions up to the senior second rank.¹⁷ In contrast, legal officials were technical professionals who passed the miscellaneous examination (*chapkwa* 雜科) or talent-recruitment examination (*ch'wijae* 取才), and usually started their job from the lowest rank of junior ninth and capped at junior sixth grade.¹⁸

¹⁶ A separate study is required to analyze the specific roles of legal students and the actual processes of legal education in provincial and central government offices. Although officially designated as "legal students," evidence indicates that their roles closely resembled those of "legal clerks" in practice. After the seventeenth century, the increasing demand for officials to manage a growing volume of public affairs, coupled with a shortage of formal bureaucrats, suggests that these legal students may have acted as pseudo-officials, or *kari* (假吏).

¹⁷ The distinctions between the two groups not only delineated clear social statuses but also enforced strict spatial segregation within the Ministry of Penal Affairs. Please see Na Yōnghun, "*Chosŏn hugi yulgwaipkyōkchaŭi ch'injok net'ŭwōk'ŭgwa kyōlsok*," 137.

¹⁸ The miscellaneous examination held every three years or occasionally during specific national events, selected 18 candidates for the first round and 9 for the second round. Successful candidates could be appointed as *Kyosu*, *Pyōlje*, *Yurhak hundo* based on their exam scores. The talent-recruitment examination was held whenever technicians were needed, and those who passed could be appointed as

Considering their professional education systems and comprehensive understanding of legal statutes, legal officials had a unique position within the Chosŏn bureaucracy despite their lower status. First, the legal codes specified the number of legal students allocated to both central and provincial government offices. As shown in Table 1, *The Great Code for Administering the Country* assigned 40 legal students to the Ministry of Penal Affairs in the central government, a number that increased to 80 by the eighteenth century.¹⁹

Moreover, *The Great Code for Administering the Country* also detailed the allocation of legal students to various provincial government offices.²⁰ Adding up the number of legal students assigned to each provincial government office, approximately 3,140 students were studying law across provincial government offices throughout the country. Among the four main technical learnings, only interpretation, medical, and legal studies had provincial students. While interpretation studies had only 156 students, legal studies, along with medicine, had a much larger number of students at provincial levels. This distribution of legal students across provinces remained consistent throughout the Chosŏn period, as further confirmed by *The Comprehensive Great Code*. These numbers suggest a deliberate effort by the government to maintain a stable presence of legal students in both central and provincial administrations, underscoring the importance of legal education during this period.

Second, the legal codes outlined the specific content of the examinations for prospective legal officials. These examinations focused on the memorization and recitation of legal knowledge that was essential during the Chosŏn period. As reflected in Table 2, candidates were required to recite and interpret *The Great Ming Code* without consulting the text, demonstrating their mastery of its contents. Additionally, they were tested on their ability to read and recite other important legal texts. These texts remained central to the legal examinations throughout the Chosŏn period, with only slight variations in the specific books and codes emphasized at different times.

[Table 2] Textbooks and Types of Exams for Legal Officials

Types of Tests	<i>The Great Code for Administering the Country</i> (1485)	<i>The Supplementary Great Code</i> (1746)	<i>The Applications of the Six Codes (Yukchŏn chorye 六典條例, 1865)</i>
To recite and interpret without consulting the book	<i>The Great Ming Code</i>	<i>The Great Ming Code</i>	<i>The Great Ming Code</i>
To read and recite by consulting the	<i>The Annotated Tang Code (Tangnyul soŭi, 唐律疏議),</i>	<i>Corner's Guide for the Elimination of Grievances,</i>	<i>Revised Edition of Corner's Guide for the</i>

Myŏngnyul, Shimnyul, and Kŏmnyul. Yi Namhŭi, “Chosŏn chŏn'giŭi yulgwan” 350-353.

¹⁹ For the duties of “legal students,” please refer to note 16. Although the reasons for this increase are not explicitly stated, it is notable that the number of legal students grew even as the overall number of officials in the Ministry of Penal Affairs decreased, suggesting the need for further research on this matter.

²⁰ 16 legal students were assigned to special cities (*Pu*, 府), 14 to greater counties (*Taedohobu*, 大都護府) and special counties (*Mok*, 牧), 12 to counties (*Toho*, 都護), 10 to lesser counties (*Kun*, 郡), and 8 to prefectures (*Hyŏn*, 縣). For more information on the provincial administration in Late Chosŏn, see Kim, Sun Joo and Kim, Jungwon. *Wrongful Deaths: Selected Inquest Records from Nineteenth-Century Korea*. 10-12.

book	<i>Corner's Guide for the Elimination of Grievances</i> (Muwŏnmok 無冤錄), <i>Explanation of Legal Studies</i> (Yurhak haei 律學解頤), <i>Clarification of Legal Doubts</i> (Yurhak pyŏni 律學辨疑), <i>The Great Code for Administering the Country</i>	<i>The Great Code for Administering the Country</i>	<i>Elimination of Grievances</i> (Chŭngsu muwŏllok 增修無冤錄), <i>The Comprehensive Great Code</i>
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In other words, the examinations focused on legal knowledge rather than on the Confucian classics and humanities. While there was a proposal in 1479 to include parts of Confucian classics in the miscellaneous exam, it remains unclear whether this was ever implemented.²¹ The legal exams throughout the late Chosŏn period consistently prioritized testing candidates' knowledge of the law, a distinctive feature of the legal education and examination system of that era. This emphasis on legal texts, particularly *The Great Ming Code*, highlights the importance placed on legal expertise over broader Confucian studies in the training of legal officials.²²

Thus, those aspiring to become legal officials began their careers as legal students, undertaking examinations focused on legal knowledge rather than the Confucian classics. This emphasis on legal training, along with examination subjects centered around legal texts, demonstrates a clear differentiation in the pathways to office between legal officials and their civil or judicial counterparts. As a result, it defined their unique yet constrained role within the Chosŏn bureaucratic hierarchy.

LEGAL OFFICIALS DURING KING CHŎNGJO'S REIGN

Each specific position within the six ranks of legal officials (shown in Table 1) has not yet been thoroughly explored. Moreover, when the term legal officials, or *yulgwan*, is mentioned in historical records, it often remains ambiguous as to which rank it precisely refers to. Despite this ambiguity, their roles during the late Chosŏn period can be broadly categorized into three distinct bureaucratic functions: those dispatched to provincial regions to support judicial administration at the local level, those serving within the Ministry of Penal Affairs to ensure the consistency of central judicial practices, and those assisting in the State Tribunal to handle high-profile and politically sensitive cases. This categorization is based on the differing judicial and administrative contexts in which legal officials operated and the specific demands of their respective roles.

The following section delves into twenty-seven cases where specific legal officials faced penalties for failing in their duties. The cases are categorized into three groups: legal

²¹ *T'aejong sillok*, 8: 1404/10/28.

²² Bourgon, Jérôme, and Pierre-Emmanuel Roux examine Chosŏn Korea's legal system as an integral part of the broader East Asian Confucian legal tradition. While acknowledging the influence of the Ming legal system, they emphasize Chosŏn's unique adaptations, including its more flexible approach to case law and the distinct role of legal experts. By situating Chosŏn law within this shared cultural framework, the authors argue that it developed into a refined and distinctive system, demonstrating both its connections to and departures from the broader East Asian legal heritage. Bourgon, Jérôme, and Pierre-Emmanuel Roux. "The Chosŏn Law Codes in an East Asian Perspective." 19-38.

officials dispatched to provinces (Table 3), those within the Ministry of Penal Affairs (Table 4), and those in the State Tribunal (Table 5).²³ These cases clarify the challenges legal officials faced under King Chǒngjo's reign and highlight their overlooked contributions to the governance and legal order of the Chosŏn state.

Legal Officials Dispatched to Provinces

First, legal officials, holding lower ranks such as *Kōmnyul*, were dispatched to local provinces to assist provincial governors (*kwanch'alsa*, 觀察使) in their judicial duties.²⁴ Governors in provincial offices were officially responsible for overseeing judicial administration within their jurisdictions. They exercised adjudicative authority in cases requiring penalties beyond 50 strokes by the light stick, such as crimes punishable by the heavy stick, penal servitude, or life in exile.²⁵ In homicide cases, governors supervised the entire judicial process, including the verification of evidence, interrogation of suspects, and examination of witnesses, ensuring the accurate determination of culpability.²⁶ Additionally, they were responsible for compiling comprehensive reports, known as *Changgye* (狀啓), which were submitted to the king. These reports included detailed information on crimes, investigation findings, prescribed punishments, and the administrative process surrounding the supervision of convicted criminals.

However, a closer examination of disciplinary records from King Chǒngjo's reign reveals that legal officials carried out the majority of these tasks. While governors retained ultimate responsibility, legal officials were directly involved in interpreting legal codes, conducting investigations, and drafting judicial documents. This division of labor placed legal officials in a precarious position, as they were held accountable for errors in these tasks, often facing harsher penalties than their supervising governors.

²³ For the primary source information for cases, see Appendix.

²⁴ For more information on the judicial authority of these governors, see Sim Hūigi, “19segi Chosŏn kwanch'alsaui sabōpchōk haengwiui siljūngjōk koch'al,” and on the magistrate, see Sim Chaeu “Chosŏn hugi suryōngui pōpchōk chiwiwa hyōngbōlgwōn haengsaui silsang”

²⁵ The five types of punishments in the Chosŏn Dynasty, based on the Great Ming Code, included corporal punishment of beating with the light stick (*t'ae* 答), punishment of beatings with the heavy stick (*chang* 杖), penal servitude (*to* 徒), punishment of exile (*yu* 流), and death penalty (*sa* 死).

²⁶ When a murder occurred in a county, the initial examination of the victim's body was conducted by the county magistrate (*Suryōng*, 守令) followed by a secondary examination by a magistrate from the adjacent county. The governor then directed the investigation to establish the cause of death and identify the perpetrators and accomplices. County magistrates not only played a crucial role in the initial investigation but also offered their views on principal offenders and other legal matters based on their findings. The governor also oversaw the interrogation of suspects and witnesses and instructed the magistrates to compile their findings into a report for the King. Legal officials assisted by conducting specific investigative tasks, such as examinations and interrogations, and by preparing the final reports under the governor's guidance. For judicial procedures and administrative structure in late Chosŏn, refer to Kim, Sun Joo and Kim, Jungwon. *Wrongful Deaths: Selected Inquest Records from Nineteenth-Century Korea*. 13-20; Shaw, William. *Legal Norms in a Confucian State*. 43-72.

[Table 3] Cases for Legal officials Dispatched to Provinces

Cases	Month-Year	Legal officials	Wrongdoings	Punishments	
				Legal Officials	Governors
A	08-1778	Kyōnggi and Chōlla Provinces' legal officials	omitting specific information in legal documentation under the jurisdiction of Kyōnggi Governor Cho Sijun and Chōlla Governor Sō Hosu	implementation of punishment by the Ministry of Penal Affairs	redemption ²⁷
B	05-1780	Hwanghae Province's legal official	omitting specific information in legal documentation for the exiled criminal Yi Chōnggyu in Hwanghae Province	implementation of punishment by the Ministry of Penal Affairs ²⁸	an oral warning
C	07-1780	Kyōngsang Province' legal official	unauthorized use of punitive instruments under the jurisdiction of Kyōngsang Province Governor Hong Nakpin	beating with the heavy stick and exile	exile (for multiple charges)
D	04-1790	Hwanghae Province' legal official	errors in drafting interrogation statements for the exiled criminal Ch'oe Chongnyōl	beating with the heavy stick and exile	a written reprimand
E	04(L)-1800	Kwangju Region's legal official	errors in drafting final statements in the murder case of Kwangju's criminal Yi Ch'un'gūm	implementation of punishment by the Governor	a one-month salary deduction

The above Table 3 summarizes five cases involving legal officials dispatched to provincial areas such as Kyōnggi, Chōlla, Hwanghae, and Kyōngsang Provinces, and Kwangju Region between 1778 and 1800. The locations indicate that these cases occurred across various areas and were not limited to a specific area. The types of wrongdoings committed by the legal officials include omitting specific information in legal documentation (Cases A and B), applying unauthorized punitive instruments (Case C), and making errors when drafting victims' statements (Cases D and E). These cases underscore the immense pressure placed on legal officials to meet the exacting standards of judicial administration.

For example, in August 1778, legal officials faced penalties due to omissions of specific information in the documentation of exiled convicts.²⁹ When exiled convicts were sent to their designated locations, it was essential to provide detailed documentation of their crimes and the corresponding punishments.³⁰ The inaccuracies in these documents from local provinces raised significant concerns. In particular, for the exiled convicts from Kyōnggi and Chōlla Provinces, the phrase "exposure of the coffin outside its grave" was missed even when

²⁷ "Redemption" refers to the payment of money, known as *sokjōn* (贖錢), to refrain from carrying out punishments. Since it exempts the offender from punishment, it is termed *sokhyōng* (贖刑). *The Great Ming Code* stipulated that certain crimes could be redeemed by accepting *sokjōn* in lieu of carrying out the punishment. This redemption practice of exempting the offender from punishment by receiving *sokjōn* serves as an expression of compassion towards the criminal and as a measure to favor royal relatives, meritorious subjects, and high-ranking officials.

²⁸ The next day, they were particularly pardoned. *Ilŏngnok* 1780/5/16.

²⁹ *Ilŏngnok* 1778/8/4, 1778/8/5; *Sŭngjōngwŏn ilgi* 1778/8/4, 1778/8/5.

³⁰ *The Great Code for Administering the Country* stated in its judicial regulations, "once convicted criminals from Seoul or other provinces arrived at their designated locations, the governor of that province shall report their crimes and the date of arrival through a formal report to the King." These reports to the King should include the personal information of the criminals, detailed descriptions of the crimes, the findings of the investigation, the final punishments prescribed based on these findings, and the specific circumstances of the relocations. Additionally, they contain information about the duties and names of those who assisted in the supervision within the governor's jurisdiction.

the law regarding “Uncovering Graves” was improperly applied.³¹ Although the governors were ultimately responsible for these reports, King Chǒngjo held them accountable only for not thoroughly reviewing the documents. The main penalties were directed at the legal officials, who were blamed for inadequate drafting and the incorrect application of legal regulations. Thus, the legal officials were punished by the Ministry of Penal Affairs, while the governors’ penalties were redeemed (see Case A).³²

These disciplinary cases from the provinces reveal that legal officials, not governors, were the ones performing the day-to-day tasks essential for judicial administration. As such, the responsibility for any failure fell on the legal official who *de facto* managed the task rather than the governors overseeing them. At the same time, these cases highlight a structural imbalance in accountability. Legal officials, despite their subordinate positions, were held to stricter standards and faced harsher punishments for errors, while governors received comparatively lighter penalties. This disparity underscores the overlooked centrality of legal officials in the Chosŏn judicial system and the vulnerabilities they faced within its hierarchical structure.

Legal Officials within the Ministry of Penal Affairs

Second, legal officials played an essential yet often underappreciated role in assisting the judicial officials, or *hyǒnggwan*, within the Ministry of Penal Affairs. The Ministry of Penal Affairs, one of the six administrative departments, was responsible for judicial functions essential for maintaining law and order, such as reviewing legal cases, enforcing laws, managing prisons, administering punishments, and handling matters related to slavery.³³

While judicial officials of the ministry formally oversaw judicial administration at the central level, it was the legal officials who handled much of the practical, day-to-day work essential to the ministry’s operations. These responsibilities included interpreting legal codes, advising on legal matters, and assisting in the adjudication of crimes and lawsuits.³⁴ Although

³¹The article of “Uncovering Graves” in *The Great Ming Code* states that in all cases of uncovering graves, if coffins are reached, the offenders shall be punished by 100 strokes of beating with the heavy stick and a permanent exile to 3,000 li. If coffins are opened and corpses are visible, they shall be punished by strangulation. If they uncover graves but do not reach coffins, they shall be punished by 100 strokes of beating with the heavy stick and penal servitude for three years.” Therefore, although verifying whether the coffin was exposed outside its grave is essential for applying this provision, in this case, the clause was applied without confirming that key detail.

³² For the meaning of “redeemed,” see note 26.

³³ The Ministry of Penal Affairs operated under a complex system known as the “Four Bureaus and Nine Divisions.” This structure divided the Ministry’s work among four subordinate offices—Bureau of Judicial Review (*Sangboksa*, 詳覆司), Bureau of Statutory Review (*Koyulsa*, 考律司), Bureau of Prison and Punishment (*Changgŭmsa*, 掌禁司), and Bureau of Slavery and Prisoners (*Changyesa*, 掌隸司)—each further divided into two divisions, in addition the Criminal Affairs Division (*Hyǒngbang*, 刑房). For more detailed information on the Ministry of Penal Affairs, see *The Applications of the Six Codes* (*Yukchŏn chorye* 六典條例) and Cho Yunsŏn, “*Hyǒngjoŭi sasagubang chikchewa silmu*.”

³⁴

Bureaus	Bureau of Judicial Review	Bureau of Statutory Review	Bureau of Prison and Punishment	Bureau of Slavery and	
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their contributions were not always explicitly documented, their involvement was indispensable for ensuring the consistent application of legal standards and the effective administration of justice throughout the state, as shown in the cases below.

[Table 4] Cases for Legal officials in the Ministry of Penal Affairs

Cases	Month-Year	Legal officials	Wrongdoings	Punishments	
				Legal Officials	Judicial Officials
a	09-1782	Yi Intam	referencing wrong legal codes on Hong Manrok's drunken disturbance near the palace	apprehension and detention	dismissal
b	04-1787	An Ch'anguk	referencing wrong legal codes on Yi Yuntae and Yi Subok's disturbance near a temple	60 beatings with the heavy stick and penal servitude for one year	interrogation
c	01-1789	Yi Yunchök	improper sentence deliberation on the exiled convict Kim Yuhang	50 beatings with the heavy stick and implementation of additional punishment by the Governor	
d	11-1790	legal official	improper sentence deliberation on a Pak Ch'angim's forgery of a branding mark	death penalty	dismissal
e	12-1798	Sö Pyöngsuk	improper sentence deliberation on Pak Ch'angyöp's assault toward guardians	100 beatings with the heavy stick and penal servitude for three years	dismissal
f	05-1799	legal official	improper sentence deliberation on Yi Ch'angrin and Kim Ch'ösin's forgery of tax documents	death penalty	a one-month salary deduction

Table 4 summarizes six disciplinary cases involving legal officials within the Ministry of Penal Affairs between 1782 and 1799. The wrongdoings committed by these legal officials can be categorized into two types: referencing incorrect legal codes (Cases a and b) and improper sentence deliberations (Cases c, d, e, and f). These issues often arose when specific legal provisions for certain situations did not exist, requiring legal officials to apply their own judgment based on pre-existing regulations. However, King Chöngjo, adhering to his strict standards for judicial precision, demanded that legal officials apply relevant laws with exacting accuracy to prevent unjust sentencing.

For example, Yi Intam, a legal official, faced severe penalties for referencing inappropriate legal codes in a case involving Hong Manrok, who caused a drunken disturbance near the palace. Given the absence of a specific legal provision addressing this kind of disturbance near the palace, Yi turned to comparable regulations. He cited *The Great Ming Code*, which prescribed 50 beatings with the light stick for causing verbal disputes within the palace, and King Yöngjo's edict, which mandated 100 beatings with the heavy stick for public intoxication. Drawing on these sources, Yi argued that Hong, as a high-ranking official, would

Divisions							Prisoners		Criminal Affairs Office
	1	2	1	2	1	2	1	2	
Legal Officials	Kyömkysu	Pyölje	Pyölje	Pyölje	Kyömkysu	Kyosu	Kyosu	Pyölje	Yurhak hundo

Under the "Four Bureaus and Nine Divisions," each position of legal officials assisted in several divisions, as the above Table shows. Meanwhile, *Myöngnyul*, *Simnyul*, and *Kömyul* were involved in reviewing legal cases, interpreting statutes, and verifying legal provisions across different administrative divisions. For more information, see *The Applications of the Six Codes*, "the Ministry of Penal Affairs."

be subjected to 100 beatings with the heavy stick, a penalty that could be mitigated through a monetary fine.

King Chǒngjo, however, criticized this legal interpretation, asserting that the location of the disturbance—just outside the palace walls—required a more severe penalty than the standard punishment for public intoxication on the streets. He underscored that such behavior near the palace was particularly egregious, regardless of the specific legal codes cited.³⁵ He admonished Yi for failing to develop a more rigorous legal rationale when the existing statutes did not directly address the case's circumstances. Consequently, Hong Manrok was sentenced to permanent exile, while Yi Intam was detained pending further sentencing. Additionally, the Minister of Penal Affairs who oversaw the proceedings was dismissed from his position (see Case a).

Similarly, in November 1790 (Case d), a legal official faced disciplinary action for applying inappropriate legal codes in a case involving Pak Changim who allegedly forged 'a branding mark (*nag'in* 烙印)'.³⁶ The Ministry of Penal Affairs recommended an expedited judgment and immediate sentencing, given his prior conviction. In other words, the statutes related to the forgery of 'a seal' was applied to Pak's case, which would result in a death sentence.³⁷ However, King Chǒngjo criticized this recommendation, noting that the available testimony was ambiguous and did not convincingly demonstrate a voluntary confession. He further challenged the legal equivalence of a branding mark and a seal, arguing that branding marks were fundamentally different from seals, which served as official marks of authority or identity.

King Chǒngjo questioned the Ministry of Penal Affairs whether the term "branding mark" was explicitly included in the legal codes and whether there were any precedents for applying forgery laws to such cases. The King accurately discerned the difference between forging a branding mark and a seal and requested judicial officials to examine how such actions had been regulated previously. However, the judicial officials were unable to provide an accurate response and admitted their lack of knowledge regarding the relevant legal precedents and regulations.³⁸ As a result, recognizing the insufficient legal knowledge among the judicial officials, King Chǒngjo decided to hold the legal officials responsible for the incorrect referencing and improper sentence deliberation, rather than the judicial officials who had

³⁵ King Chǒngjo's response may have been influenced by his heightened sensitivity to palace security following a similar disturbance in 1777. *Ilsongnok* 1782/10/5.

³⁶ *Simmirok* 21: 1790. Seoul; *Ilsongnok* 1790/11/1; *Sŭngjŏngwŏn ilgi* 1790/11/1. 'A branding mark' in this context refers to a mark applied to objects such as identification tags, indicating ownership or personal details. It differs from the forgery of the seal itself, as it involves falsely applying a mark rather than creating a counterfeit item.

³⁷ Article of "Counterfeiting Items Such as Seals and Almanacs" in *The Great Ming Code* stipulates "In all cases of counterfeiting yamen seals, almanacs, tallies, night patrol bronze tallies, tea licenses, or salt licenses, the offenders shall be punished by decapitation." For how the regulation on counterfeiting seals was applied during the Chosŏn dynasty and how legal provisions evolved thereafter, see Yi Hagyŏng's study, "*Chosŏnsidae wijo pŏmjoeŭi kyujewa ch'ŏbŏl.*"

³⁸ *The supplementary Great Code* (1746) states that a person who forges an identity tag shall be punished according to the same legal provisions applied to the forgery of official seals. For more information, see Yi Hagyŏng, "*Chosŏnsidae wijo pŏmjoeŭi kyujewa ch'ŏbŏl.*" 268-275.

overseen the case.³⁹ This decision underscores that it was the lower-ranking legal officials, rather than the senior judicial officials, who were expected to possess detailed legal expertise and ensure the correct application of the law (Case d).

Similar to these, the review of criminal cases handled by the Ministry of Penal Affairs reveals that the critical responsibility of interpreting statutes and bridging legislative gaps fell on legal officials. While judicial officials held formal authority, it was the legal officials who bore the practical burden of ensuring legal coherence in cases often marked by statutory ambiguities. Despite their indispensable role, disagreements with King Chǒngjo over the application of analogous legal provisions consistently resulted in legal officials being held accountable, highlighting both their centrality to the judicial process and the structural vulnerabilities they faced within the Ministry.

Legal Officials within the State Tribunal

Finally, legal officials were also assigned to other central government offices beyond the Ministry of Penal Affairs to provide legal expertise and support. During the Chosŏn period, the distinction between executive and judicial functions was not clearly defined, resulting in overlapping jurisdictions among different government bodies. To address this overlap, legal cases, initially centralized from the province to the Ministry of Penal Affairs, were later redistributed: those involving high-ranking government officials to the State Tribunal (*Ŭigumbu* 義禁府), theft cases to the Capital Police (*P'odoch'ōng*, 捕盜廳), land or slave-related cases to the *Hansŏng* City Administration (*Hansŏngbu*, 漢城府), while the Ministry retained the rest.⁴⁰ These central government offices also had the authority to arrest and punish offenders within their jurisdictions, which required the expertise of legal officials to identify relevant laws and ensure compliance with established legal codes.

Among these offices, the State Tribunal presented significant challenges for legal officials, as it adjudicated high-profile cases involving senior officials and politically sensitive matters. Within the State Tribunal, legal officials functioned as critical aid to judicial officials, who held decision-making authority through collective deliberations.⁴¹ As revealed in Table 5, their primary responsibilities encompassed conducting comprehensive legal analysis, referencing statutory provisions, and drafting preliminary legal documents to facilitate judicial deliberations. Thus, among the diverse tasks, the role of supporting for referencing legal codes and deliberating final sentences mattered most for the legal officials.

[Table 5] Cases for Legal officials in the State Tribunal

Cases	Month-Year	Legal officials	Wrongdoings	Punishments	
				Legal Officials	Judicial Officials

³⁹ In Cases d and f, the death sentence given to the legal official follows a logic similar to that of false accusation, where the accuser is punished by the same severity as the crime they falsely attributed to another person. The punishment that was incorrectly referenced would also be imposed on the official. However, it remains unclear whether the death sentence was carried out.

⁴⁰ Cho Yunsŏn, “*Sukchongdae hyŏngjoŭi chaep'an ōmmuwa hapŭijejŏk chaep'anjedŏŭi unyŏng*,” 153.

⁴¹ For a detailed discussion of the judicial process within the State Tribunal, particularly the procedures for referencing legal statutes, see Cho Yunsŏn, “*19segi ŭigumbuŭi ŭiyurōmmuwa wangogŭi kinŭng*.”

1	03-1781	legal official	omission of specific charges for the convict Yi Ŭiro	implementation of punishment by the Ministry of Penal Affairs	investigation
2	05(L)-1781	Kwŏn Chŏngki	referencing wrong legal codes on the unauthorized purchase of a traitor's property	100 beatings with the heavy stick (substitutable) and exile	dismissal
3	09-1781	Chang Tŏkrin	improper sentence deliberation for Yun Hwak's failure to obey the King's summons	100 beatings with the heavy stick and penal servitude for three years → redemption	interrogation and a one-month salary deduction
4	02-1782	legal official	referencing wrong legal codes on Kim Kwangu's improper attire	implementation of punishment by the Ministry of Penal Affairs	investigation
5	07-1782	Chang Tŏkrin	improper sentence deliberation on Yi T'aekjing's submitting a disrespectful memorial to the throne	100 beatings with the heavy stick and exile	investigation
6	09-1783	Han Chongchi	improper sentence deliberation on Cho Hyŏnggyu's failure to properly address a subordinate's corruption	penal servitude for one year	investigation
7	12-1785	Han Tŭkryang	improper sentence deliberation for the convict Sŏ T'aesu's wrongdoings	30 beatings with the heavy stick	
8	09-1787	Han Tŭkryang	improper sentence deliberation for the convict Kim Chŏnggu	indefinite conscription into the military	dismissal
9	06-1790	legal official	improper sentence deliberation on Yun T'aeksin's failure to properly escort the ship	exile	an oral warning
10	11-1791	Yi Yunchŏk	improper sentence deliberation on Sin Sa'wŏn's failure in handling Catholic-related affairs	100 beatings with the heavy stick	
11	07-1793	Yi Yunchŏk	improper sentence deliberation on Pak Chega's failure to oversee local public taxes	100 beatings with the heavy stick	
12	04-1794	Yi Yunchŏk	improper sentence deliberation on Cho Chonghyŏn's unauthorized entry into the palace gates	100 beatings with the heavy stick	
13	05-1795	Han Sangil	improper sentence deliberation on Yi Ch'ŏlsun's insulting a superior	apprehension and release	investigation
14	05-1799	Kim Kyŏngsuk	improper sentence deliberation on Yi Ŭngbok's excessive taxation	60 beatings with the heavy stick and dismissal	
15	05-1799	legal official	improper sentence deliberation on Song Chŏngju's failure to properly address a subordinate's corruption	implementation of punishment by the Ministry of Penal Affairs	investigation
16	09-1799	legal official	improper sentence deliberation on Yi Wan's use of coercion to cause others' deaths	implementation of punishment by the Ministry of Penal Affairs	investigation

Table 5 includes sixteen cases on legal officials of the State Tribunal that occurred throughout King Chŏngjo's twenty-three-year reign. The consistent distribution of these cases throughout his reign underscores his sustained and systematic interest in overseeing the responsibilities and performance of legal officials. This pattern indicates that his scrutiny was not a reaction to isolated incidents involving specific individuals but rather part of a broader governance strategy aimed at ensuring the integrity and accountability of the judicial process.

The wrongdoings of legal officials include omissions of specific charges for the convict (Case 1), referencing wrong legal codes (Cases 2 and 4), and improper sentence deliberations (all remaining Cases). The roles of legal officials in these cases were largely aligned with those of their counterparts in the Ministry of Penal Affairs, particularly in terms of interpreting legal provisions and deliberating on sentences. However, a critical distinction

lies in the nature of the offenses and the social status of the convicts.

For example, Table 5 includes the offenses of high-ranking officials' duties—such as submitting inadequate petitions (case 5), failing to prevent corruption among subordinates (case 6 and 15), mishandling Catholic disturbances in the provinces (case 10), and mismanaging taxes or public funds (case 11, 14). These cases were often complex because they lacked specific legal statutes that directly applied to the particular circumstances. Consequently, legal officials had to interpret and apply existing laws that they considered as more relevant, even if those laws were not an exact fit.

This reliance on comparable statutes often led to controversial legal interpretations and inconsistencies in sentencing, resulting in either undue leniency or overly harsh penalties for senior officials. Recognizing these issues, King Chǒngjo insisted on a more stringent approach to legal referencing. He required legal officials to adopt a broader perspective, carefully considering the context, fairness, and gravity of each situation to ensure that the legal decisions were both just and appropriate. By demanding precise legal interpretations and balanced reasoning, King Chǒngjo sought to uphold the integrity of the judicial process and ensure those judicial cases.

Regarding crimes committed by high-ranking officials, Case (3) would be an example. Yun Hwak, a chief censor, faced questioning at the State Tribunal for refusing the king's summons without a valid reason. Despite King Chǒngjo's stern request to handle Yun's case harshly due to its implications for maintaining discipline, legal official Chang Tōkrin only proposed the dismissal of Yun Hwak from his current position without additional punishment. Considering Yun's status as a high-ranking official, King Chǒngjo perceived the legal official's leniency as deliberate. Therefore, the King ordered the punishment of legal official Chang and a one-month salary reduction for the judicial officials in the State Tribunal.

The punishments for these legal officials vary widely, ranging from apprehension and release to harsher penalties, including beatings with the heavy stick, penal servitude, exile, and indefinite conscription into the military. In contrast, judicial officials were subject to lighter penalties, such as dismissal, apprehension and release, or a formal warning. Similar to the cases from the Ministry of Penal Affairs, within the State Tribunal, legal officials incurred harsher penalties for errors in legal deliberation, reflecting their direct responsibility for legal statutes.

Within the State Tribunal, as with the Ministry of Penal Affairs, legal officials incurred harsher penalties for their errors in legal duties. In contrast, lesser penalties were imposed on other judicial officials, primarily attributed to negligence in their supervision. Interestingly, in the State Tribunal, specific legal officials repeatedly received punishments on several occasions. Legal official Yi Yunchōk received the punishment of 100 beatings with the heavy stick three times for three separate cases, which would be a huge challenge to endure even once (Case 10, 11, 12). While not explicitly stated, the choice to retain these legal officials in their roles, following punishments, could imply a certain acknowledgment of their expertise.⁴²

⁴² The repeated involvement of these officials suggests that they were among the few with the expertise to handle complex legal matters. King Chǒngjo's decision to retain them may have been a strategic effort to balance the imperative of upholding high legal standards with the practical constraints of a limited pool of qualified legal professionals. However, this interpretation warrants further research to

Conclusion

This study has revisited the roles and challenges of legal officials during King Chǒngjo's reign, shedding new light on legal officials who have long been overlooked in the historical narrative. In the first section, the status of legal officials was analyzed from two key perspectives. First, their affiliation with the Committee of Legal Studies within the Ministry of Penal Affairs highlighted their lower rank within the broader bureaucratic structure. Second, both the career paths leading to their positions and their official ranks reflected their diminished status. Unlike their civil or judicial counterparts, legal officials followed a specialized path that focused on legal knowledge rather than Confucian classics, setting them apart while simultaneously restricting their influence within the bureaucratic hierarchy.

In the next section, this study investigated the roles of legal officials within the judicial system of late Chosŏn Korea by analyzing twenty-seven cases from King Chǒngjo's reign, categorizing their functions into three primary areas. First, legal officials were dispatched to local provinces to support provincial governors, particularly in handling criminal cases; second, they assisted judicial officials within the Ministry of Penal Affairs in legal administration; and third, they provided specialized legal expertise to other central government bodies, including the State Tribunal. Despite their subordinate status within the bureaucratic hierarchy, legal officials played an indispensable role in the administration of justice by interpreting statutes, ensuring the consistent application of laws, and providing essential legal support across local and central levels. The case studies revealed their active involvement in legal processes, acting in advisory and interpretive capacities.

While this study primarily focuses on the roles and challenges of legal officials under King Chǒngjo, an intriguing implication emerges: a tension in King Chǒngjo's approach to legal officials. On the one hand, he relied heavily on their expertise in navigating complex legal precedents and ambiguous statutes. Numerous records depict King Chǒngjo consulting these legal officials for advice in reviewing legal documents.⁴³ When legal precedents were difficult to find or legal terminology was unclear, the King turned to the legal officials for guidance and relied on their interpretations. On the other hand, he displayed a profound mistrust of their work, subjecting their legal documents to intense scrutiny and often imposing disproportionately harsh punishments for errors. This tension—between reliance on their expertise and mistrust of their independent judgment—could raise critical questions about the nature of legal authority and control in the Chosŏn judicial system.

Moving forward, future research should seek to expand the scope of analysis, both in

better understand the broader implications of such retention practices on the functioning of the Chosŏn judicial system under King Chǒngjo.

⁴³ A specific example is the records from December 23 - 25, 1782, where King Chǒngjo consulted legal officials for guidance on the O Ch'anju case. By questioning the most knowledgeable legal official present, he aimed to emphasize that the case was judged according to the correct interpretation of the law. *Ilŏngnok* 1782/12/23; 1782/12/25. Similarly, see the case where King Chǒngjo consulted legal officials to determine whether a homicide was an act of revenge for the murder of one's parents (*Ilŏngnok*, 1791/3/15); for clarification of ambiguous sections of legal statutes, see *Ilŏngnok*, 1791/3/15; and for references to legal precedents, see *Ilŏngnok*, 1784/6/19.

terms of the period examined and the actors considered. Analyzing King Chǒngjo's relationship with legal officials in a broader historical context will provide insights into how this tension between expertise and control shaped the development of the judicial system and political governance in subsequent periods. For example, this approach may raise questions about the sustainability of a judicial system that relies heavily on the personal oversight of a single ruler. While his interventions may have been effective in maintaining rigorous legal standards during his reign, they also risked creating a system overly dependent on his personal authority and legal acumen. Such a system could face challenges in maintaining consistency and independence in legal decision-making after his reign.⁴⁴ Furthermore, understanding how the evolving roles of legal officials influenced the trajectory of legal reforms after the eighteenth century will be crucial in grasping the long-term impact of King Chǒngjo's judicial policies.

By re-examining the roles and challenges of legal officials under King Chǒngjo, this study has opened up new avenues for understanding the complexities of legal governance in Chosŏn Korea. It challenges prevailing negative perceptions of legal officials and suggests a reevaluation of their contributions to the legal developments of the eighteenth century. This focus sets the stage for further inquiry into the evolving role of legal professionals in Korean history.⁴⁵

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⁴⁴ A similar discussion appears in studies that argue King Chǒngjo's policy of impartiality (*t'angp'yŏngch'aek* 蕩平策) effectively maintained a balance of power among factions during his reign by preventing any single group from dominating. However, after his death, the absence of a strong mediator allowed in-law families to seize control, leading to the rise of in-law politics (*sedo* politics 勢道政治). This reliance on King Chǒngjo's personal authority, rather than on institutional mechanisms, may have had long-term negative consequences, as the political system became vulnerable to factional dominance after his reign. For more information, see Kim Paekch'ŏl, "1990nyŏndae han'guksahoeŭi 'chǒngjosindŭrom' taeduwa paegyŏng" 31.

⁴⁵ Furthermore, this study would like to point out the possibility of the over-representation of negative views toward legal officials when interpreting historical records. The positive aspects of legal officials properly fulfilling their duties may be underrepresented in historical records, while negative perceptions of legal officials, as evidenced by problematic cases like the twenty-seven discussed in this study, may be more prominently documented. Therefore, when attempting to reconstruct societal perceptions of legal officials based solely on existent records, there are inherent limitations in the likelihood of these negative perceptions being overly represented.

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[Appendix] Primary Source Information for Cases

Cases	Month-Year	Legal Officials	Wrongdoings	Primary Source Information
A	08-1778	Kyŏnggi and Chŏlla Provinces' legal officials	omitting specific information in legal documentation under the jurisdiction of Kyŏnggi Governor Cho Sijun and Chŏlla Governor Sŏ Hosu	<i>Ilŏngnok</i> 1778/8/4, 1778/8/5; <i>Sŭngjŏngwŏn ilgi</i> 1778/8/4, 1778/8/5
B	05-1780	Hwanghae Province' legal official	omitting specific information in legal documentation for the exiled criminal Yi Chŏnggyu in Hwanghae Province	<i>Ilŏngnok</i> 1780/5/15, 1780/5/25; <i>Sŭngjŏngwŏn ilgi</i> 1780/5/14, 1780/5/15
C	07-1780	Kyŏngsang Province's legal official	unauthorized use of punitive instruments under the jurisdiction of Kyŏngsang Province Governor Hong Nakpin	<i>Ilŏngnok</i> 1780/7/26, 1780/7/27; <i>Sŭngjŏngwŏn ilgi</i> 1780/7/19, 1780/7/26, 1780/7/27
D	04-1790	Hwanghae Province' legal official	errors in drafting interrogation statements for the exiled criminal Ch'oe Chongnyŏl	<i>Ilŏngnok</i> 1790/4/9; <i>Sŭngjŏngwŏn ilgi</i> 1790/4/9
E	04(L)-1800	Kwangju Region's legal official	errors in drafting final statements in the murder case of Kwangju's criminal Yi Ch'un'gŭm	<i>Simnirok</i> 32: 1799. Chŏlla Province; <i>Ilŏngnok</i> 1799/12/8, 1800/3/14, 1800/(L)4/23; <i>Sŭngjŏngwŏn ilgi</i> 1799/12/8, 1800/3/15, 1800/(L)4/23
a	09-1782	Yi Intam	referencing wrong legal codes on Hong Manrok's drunken disturbance near the palace	<i>Ilŏngnok</i> 1782/9/28, 1782/9/29, 1782/10/5; <i>Sŭngjŏngwŏn ilgi</i> 1782/9/28, 1782/9/29, 1782/10/3, 1782/10/5, 1782/10/6
b	04-1787	An Ch'anguk	referencing wrong legal codes on Yi Yuntae and Yi Subok's disturbance near a temple	<i>Ilŏngnok</i> 1787/4/9, 1787/4/12, 1787/4/13; <i>Sŭngjŏngwŏn ilgi</i> 1787/4/9, 1787/4/12, 1787/4/13
c	01-1789	Yi Yunchŏk	improper sentence deliberation on the exiled convict Kim Yuhang	<i>Ilŏngnok</i> 1789/1/19; <i>Sŭngjŏngwŏn ilgi</i> 1789/1/19

d	11-1790	legal official	improper sentence deliberation on a Pak Ch'angim's forgery of a branding mark	<i>Simnirok</i> 21: 1790. Seoul; <i>Ilŏngnok</i> 1790/11/1; <i>Sŭngjŏngwŏn ilgi</i> 1790/11/1
e	12-1798	Sŏ Pyŏngsuk	improper sentence deliberation on Pak Ch'angyŏp's assault toward guardians	<i>Ilŏngnok</i> 1798/12/5, 1798/12/11, 1798/12/12, 1798/12/15 <i>Sŭngjŏngwŏn ilgi</i> 1798/12/5, 1798/12/11, 1798/12/12, 1798/12/21
f	05-1799	legal official	improper sentence deliberation on Yi Ch'angrin and Kim Ch'ŏsin's forgery of tax documents	<i>Simnirok</i> 31: 1799. Seoul; <i>Ilŏngnok</i> 1799/5/12, 1799/5/22, 1799/5/25, 1799/8/5; <i>Sŭngjŏngwŏn ilgi</i> 1799/5/12, 1799/5/22, 1799/5/24, 1799/8/5
1	03-1781	legal official	omission of specific charges for the convict Yi Ŭiro	<i>Ilŏngnok</i> 1781/2/29, 1781/3/6, 1781/3/7, 1781/3/8, 1781/3/10, 1781/3/11; <i>Sŭngjŏngwŏn ilgi</i> 1781/2/29, 1781/3/1, 1781/3/6, 1781/3/7, 1781/3/8, 1781/3/10, 1781/3/11, 1781/3/12
2	05(L)-1781	Kwŏn Chŏngki	referencing wrong legal codes on the unauthorized purchase of a traitor's property	<i>Ilŏngnok</i> 1781/(L)5/28, 1781/(L)5/29; <i>Sŭngjŏngwŏn ilgi</i> 1781/(L)5/28, 1781/(L)5/29
3	09-1781	Chang Tŏkrin	improper sentence deliberation for Yun Hwak's failure to obey the King's summons	<i>Ilŏngnok</i> 1781/9/2, 1781/9/6, 1781/9/10; <i>Sŭngjŏngwŏn ilgi</i> 1781/9/2, 1781/9/6, 1781/9/10
4	02-1782	legal official	referencing wrong legal codes on Kim Kwangu's improper attire	<i>Ilŏngnok</i> 1782/2/18; <i>Sŭngjŏngwŏn ilgi</i> 1782/2/18, 1782/2/11, 1782/2/13, 1782/2/18, 1782/2/19
5	07-1782	Chang Tŏkrin	improper sentence deliberation on Yi T'aekjing's submitting a disrespectful memorial to the throne	<i>Ilŏngnok</i> 1782/7/3 <i>Sŭngjŏngwŏn ilgi</i> 1782/6/2, 1782/7/3, 1782/7/27
6	09-1783	Han Chongchi	improper sentence deliberation on Cho Hyŏnggyu's failure to properly address a subordinate's corruption	<i>Ilŏngnok</i> 1783/6/9, 1783/6/15, 1783/7/4, 1783/7/5, 1783/9/6, 1783/9/10, 1783/9/17, 1783/9/25, 1783/9/28; <i>Sŭngjŏngwŏn ilgi</i> 1783/6/9, 1783/6/15, 1783/7/4, 1783/7/5, 1783/9/6, 1783/9/10, 1783/9/11, 1783/9/17, 1783/9/25, 1783/9/26, 1783/9/28
7	12-1785	Han Tŭkryang	improper sentence deliberation for the convict Sŏ T'aesu's wrongdoings	<i>Ilŏngnok</i> 1785/12/3, 1785/12/11; <i>Sŭngjŏngwŏn ilgi</i> 1785/12/3, 1785/12/11, 1785/12/12
8	09-1787	Han Tŭkryang	improper sentence deliberation for the convict Kim Chŏnggu	<i>Ilŏngnok</i> 1787/9/3, 1787/9/5; <i>Sŭngjŏngwŏn ilgi</i> 1787/9/3, 1787/9/5, 1787/9/11
9	06-1790	legal official	improper sentence deliberation on Yun T'aeksin's failure to properly escort the ship	<i>Ilŏngnok</i> 1790/3/21, 1790/6/9, 1790/6/17; <i>Sŭngjŏngwŏn ilgi</i> 1790/3/21, 1790/6/10, 1790/6/17, 1790/6/24
10	11-1791	Yi Yunchŏk	improper sentence deliberation on Sin Sa'wŏn's failure in handling Catholic-related affairs	<i>Ilŏngnok</i> 1791/11/3, 1791/11/6, 1791/11/9, 1791/11/19, 1791/11/21 <i>Sŭngjŏngwŏn ilgi</i> 1791/11/3, 1791/11/6, 1791/11/9, 1791/11/19, 1791/11/21, 1791/11/23, 1791/11/28
11	07-1793	Yi Yunchŏk	improper sentence deliberation on Pak Chega's failure to oversee local public taxes	<i>Ilŏngnok</i> 1793/7/2, 1793/7/5, 1793/7/6, 1793/7/26; <i>Sŭngjŏngwŏn ilgi</i> 1793/7/2, 1793/7/5, 1793/7/6, 1793/7/7, 1793/7/26
12	04-1794	Yi Yunchŏk	improper sentence deliberation on Cho Chonghyŏn's unauthorized entry into the palace gates	<i>Ilŏngnok</i> 1794/4/5, 1794/4/12, 1794/4/14; <i>Sŭngjŏngwŏn ilgi</i> 1794/4/5, 1794/4/12, 1794/4/14
13	05-1795	Han Sangil	improper sentence deliberation on Yi Ch'ŏlsun's insulting a superior	<i>Ilŏngnok</i> 1795/5/4, 1795/5/6, 1795/5/7, 1795/5/25; <i>Sŭngjŏngwŏn ilgi</i> 1795/5/4, 1795/5/6, 1795/5/7, 1795/5/25, 1795/5/26
14	05-1799	Kim Kyŏngsuk	improper sentence deliberation on Yi Ŭngbok's excessive taxation	<i>Ilŏngnok</i> 1799/5/7, 1799/5/10; <i>Sŭngjŏngwŏn ilgi</i> 1799/5/7, 1799/5/10
15	05-1799	legal official	improper sentence deliberation on Sŏng Chŏngju's failure to properly address a	<i>Ilŏngnok</i> 1799/5/7, 1799/5/13, 1799/5/23; <i>Sŭngjŏngwŏn ilgi</i> 1799/5/7, 1799/5/22,

			subordinate's corruption	1799/5/23, 1799/5/28
16	09-1799	legal official	improper sentence deliberation on Yi Wan's use of coercion to cause others' deaths	<i>Ilŏngnok</i> 1799/9/11, 1799/9/16, 1799/9/19, 1799/9/25, 1799/9/28; <i>Sŭngjŏngwŏn ilgi</i> 1799/9/11, 1799/9/16, 1799/9/19, 1799/9/25, 1799/9/26, 1799/9/27, 1799/9/28,