The Magistrate as Intermediary: Rectifying Injustice in *Zhe yu gui jian* 折獄龜鑑
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Resolving cases that had been decided unjustly would seem to be an important task of the local official in middle-period China. For there to be confidence in the effectiveness of the legal system overall, there had to be the expectation that cases were correctly adjudicated. Deciding difficult cases and overturning unjust verdicts were ways to demonstrate the reliability of the system by showing it to be effective even in the most extreme cases. Yet if cases were resolved incorrectly, the legal system of this world was hardly the end of the matter. Within the pre-modern Chinese mentality, alternative ways of resolving injustice included postmortem revenge, the law of karma, and the intervention of deities. These extra-worldly means of dealing with injustice demonstrated the fissures in the legal system, often to the detriment of officials.¹ Thus, when an official was faced with resolving an instance of injustice, this placed him at the nexus of two key challenges for the legal system on the local level.² First, concepts of injustice and how it was resolved were not the exclusive domain of the state-established justice system. Second, the official found himself amidst a local culture, with its own relationship to authority.

The Southern Song legal collection *Zhe yu gui jian* 折獄龜鑑 ("Tortoise-shell Mirror for Deciding Cases") provides an entry point for these issues. Its compiler, Zheng Ke 鄭克, who collected and commented on 280 cases, had a clear interest in the topic of injustice. Although Robert Van Gulik argued that the text as we have it had been significantly altered in the Ming, and thus was of little use, Colin Hawes has refuted Van
Gulik’s criticisms in detail. iii A careful reading of the present texts shows that the Zheng Ke frequently refers back to cases already discussed, in such away that suggest the order and content of his commentaries must largely reflect what he intended. Unlike the better-known Enlightened Judgments (Minggong shupan qingming ji 名公書判清明集), which is organized by types of cases (e.g. those concerning officials, concerning inheritance) based loosely on the divisions in the Song legal code, Tortoise-shell Mirror is organized by the problems presented by particular cases. iv These can be abstract, such as "Releasing Injustice" (shiyuan 釋冤) or "Investigating Circumstances" (juqing 鞫情), or more specific, in the case of categories like "Investigating Concealment" (chate 察慝) and "Tracing Thieves" (jidao 追盜). The compiler and commentator, Zheng Ke 鄭克, distinguished between these two major categories of cases, labeling the former "primary" (zheng 正) and emphasizing it both organizationally and through the space devoted to it. v

In each of these categories, Zheng Ke collected anecdotes, often historical and previously published, and added his own comments to them. These comments provide his perspective on various legal issues, as well as the role of the official. While the stories may not be original, Zheng’s contribution came through their selection, arrangement, and commentary. The first topic, to which is devoted the greatest amount of space, is "Releasing Injustice" (shiyuan 釋冤). In his notes on these cases, Zheng highlights different strategies officials might use in overturning incorrect verdicts and solving difficult cases, and also suggests personal qualities he believes the just official should possess.

In one of the cases Zheng included, the Buddhist understanding of injustice and retribution comes into direct conflict with the concept of justice as understood by the
legal profession. This case, the events of which took place in the early Song dynasty, concerns a monk who observes a theft and kidnapping in the middle of the night. The monk had been refused lodging at the home of the victim and so was sleeping outside the victim’s gate. Knowing that he would be the primary suspect, the monk runs off. He flees into a field, where he falls down a disused well. By unhappy coincidence, the woman who had been kidnapped has been murdered, and her corpse dumped in the same well. When he is taken into custody, the monk cannot endure the interrogation and gives a false confession. However, Xiang Minzhong 向敏中, the judge in charge, remains unconvinced, largely because the stolen goods and the weapon have not been recovered, and goes to interrogate the monk himself. The monk will only say "In a former life, I was responsible for this person's fate; it is not something I can speak of."vi The monk, knowing himself to be innocent, is still willing to take the blame for the crime because his understanding of justice is not confined to this lifetime.

To understand this mindset, we can turn to one of the tales recounted by Hong Mai 洪邁 (1123-1202) in his Yijian zhi 夷堅志. The characters in this story are tied together until the enmity (yuan 冤) between them is resolved, yet they cannot understand the motivations and implications of their actions, as they extend beyond their own lifetimes. That is to say, the lack of awareness in regard to a past life’s crime is not a mitigating factor; one is still responsible for one’s crimes even if they were not committed in the present incarnation. Something or someone has to intercede to bring the cycle to a halt, and here a statue of the Buddha performs the intervention. The statue is found by a Mr. Zhang, and it advises him that he will be killed by a man he himself had killed in a previous life. Because he understands what is happening, Mr. Zhang is able to
stop his would-be killer and explain to him their prior relationship. The would-be killer then tosses away his knife, and says "Enmity should be released and not made fast. In the past, you killed me, but if I kill you now, you must kill me again in a future life — when will it end? Now I release you in order to unwind this cycle." Their decision reflects the influence of the precepts of the *Brahma Net Sūtra*, one of the foundational texts for Buddhist morality in China for both laypeople and clergy, which forbade retribution and vengeance even against those who killed one's parents. Buddhists were expected to restrain the impulses that would continue the cycle of violence, even when it seemed justified in the moment.

The monk confronted by Xiang Minzhong shares this perspective on justice and as a consequence does not protest his own mistaken arrest and death sentence. He understands his situation not as injustice, but as repayment for the deeds of a past life. In the monk’s mind, he has no right to plead injustice, because he sees himself as the initial (albeit unknowing) perpetrator of that injustice. This explanation is not persuasive to the official — however much it might have reflected common beliefs — and he persists in his questioning. The monk finally comes out with the truth. The actual circumstances and the fact that the murderer is still free are irrelevant to the monk, as he feels that he owes a life. In Zheng’s view a confession is not sufficient for the good official, even if it brings the case to resolution. The facts must be known, and the justice system brought into accord with these facts. As with many other cases, the official uses subterfuge to discover the criminal's identity and also recovers the stolen goods. This physical evidence, rather than a confession, is the means to resolve the case definitively.

When we examine circumstances surrounding the resolution of the case, we see
that the official also has to grapple with local resistance to government inquiries. Once he knows the monk is not guilty, he official dispatches one of his subordinates to the village in disguise. While the official is taking a meal at an inn, he is approached by an old woman, who inquires about the fate of the monk. He lies that the monk has already been put to death. The old woman follows up, asking what would happen if someone else had committed the crime, and the official asserts that the government would not pursue the case. The old woman offers up the name of the real killer, saying that it does not matter if she speaks now, and willingly points out his house. This episode suggests a difficult relationship between local officials and the people they governed. It seems clear that the village was protecting one of its own, and no one was willing to inform officials, at least while the criminal was in legal jeopardy. To gain information, the official has to disguise his intentions.

Another of Zheng’s cases, dating from the Tang dynasty, reinforces this point. A merchant traveling by boat makes date with a young woman for the evening. That night, she opens her door to wait for him, but a thief enters instead and slits her throat. The wealthy merchant arrives for his appointment, steps in the blood, then hears the blood gurgling from the girl's throat, realizes what has happened, and flees.

The family followed his tracks and brought the case to the government office (訟於公府). They sent men to pursue the merchant and detain him. In fetters he was interrogated and spewed out the facts of the affair, but did not confess to be the murderer. [Liu] Chonggui looked at the knife that had been left behind and recognized it as a butcher's knife. Consequently, he sent down an order, saying, "On such-and-such a day there will be a great feast. The butchers of the whole district should gather at the festival grounds, in order to help with the butchering." When they dispersed at night, each was ordered to leave their knife and to come back the next day. Then Chonggui ordered that the murderer's knife be switched with one of the knives left behind. The next day, everyone came back to claim their knives. One person did not leave, saying the remaining knife was not his. When asked whose knife it was, he said it was so-and-so's knife.
Zheng comments, “Now, if one wishes to rectify injustice, one must have a method. Switching knives was the method to trace a thief.... Thus compassionate methods are found herein, and the gentleman also cannot overlook them.” Indeed, this was a very clever method, but on the face of it overly complicated. Why did Liu Chonggui not just ask a local butcher whose knife it was? It seems likely that Liu does not expect he will get an honest answer with a straightforward approach, and he therefore has to elicit the information needed without revealing why he wants it.

These are the sorts of solutions Zheng Ke often describes as “crafty” (jue 謎). The use of "craftiness" entailed deception on the part of the official — something Zheng expressed approval of, while at the same time hinting that "craftiness" was perceived to be a troublesome quality in government officials. Yet such strategies may have been necessitated by the unwillingness of local people to tell what they know or bear witness against their neighbors. An official's success depends in part on finding a way to work around the tension between government and locality. Better than such trickery was the acquisition of real local knowledge. In case under a different classification, Zheng relates that when one controller-general, charged with overseeing the prefect, was posted to a place known for its litigious population, the official took the time to get to know the local customs (fengsu 風俗) and review cases brought in the district. As a result, the locals were unable to trick him and those charged with crimes thought it "not unjust" (不寃). Local knowledge, in this case, could be a significant part of the administration of justice.

Officials often availed themselves of deceptive means to deal with local people, but there was often good reason for suspicion of government officials. Zheng comments
at one point on the phenomena of criminals being released and poor people arrested in
their place, noting that this happens due to pressure from above, or because officials wish
to cover up their own failures to avoid punishment and reap the rewards. Zheng also
recounts a case in which the official has to persist although the emperor himself ordered
the case concluded. The injustice is rectified in the end, and Zheng remarks, “The *Lunyu*
says: ‘Those who are benevolent must also be courageous.’ This is that by which [Li] was
able to release injustice.” Through Zheng's comments at the end of these cases, we can
build up a profile of the qualities required of an official who wished to prevent injustice.
Such traits include devotion to one's work, persistence, attentiveness, and sympathy for
the accused. These traits balanced out the trickery or deception sometimes required to
bring about justice. The development of such traits is also in part a response to the
sometimes difficult relationships between the local populace and the officials charged
with administering justice.

If the local people mistrusted the legal system and those administering it, they
were more likely to look for justice outside of this world, or to hope for supernatural
intervention in the legal process. There are countless tales of ghosts intervening to ensure
that justice is served in worldly courts. In the sixth-century collection known as *Records
of Avenging Spirits (Yuanhun zhi冤魂志)*, compiled by Yan Zhitui 顏之推 (531-591) a
wronged spirit intervenes to bring about legal proceedings. In this tale, the son of an
official is making his way home for his father’s funeral when he is robbed and drowned.
In a case such as this, the body might never be found, meaning that not only would the
corpse not have the proper post-mortem rites, but also there would be no reason to
investigate a crime. The son appears to his mother later that same night, complaining at
length about his watery grave. Finally fatigued, he puts his head down on the windowsill and falls asleep. In the morning the mother finds that the place where she had seen him sleeping was indeed wet, and then goes to find an official to investigate. They are able to verify the times of death, as reported by the ghost, and the perpetrators are apprehended. Here the ghost fills a gap in the legal process. Because of the way in which the corpse was disposed, the ghost provides the information necessary for his death to be discovered, and the murderers brought to justice. The ghost is thus playing the role of a competent magistrate.

In other cases, justice in this world is a reflection of the legal proceedings of the underworld, extending what Paul Katz has called the “judicial continuum” to the post-mortem realm. In a tale closer to the time of the *Tortoiseshell Mirror*, Hong Mai tells of dispute between two men.

Mr. Li and Mr. Chen of Shuiyang had a dispute and went to court. Mr. Li worked for the Qin prefecture [office] and used his influence to lay the blame on Chen. Old Man Chen died in prison. After several years, his young son was in the fields and was harassed by a white dog, [whereupon] he took his staff and chased it. The dog ran into the hall of the Li family, and suddenly disappeared. That night the Old Man appeared to his wife in a dream, and said, "I have harbored anger through the years, [but] now it has been reinvestigated and corrected, thus I have come to inform you. Tomorrow you should offer libations in order to mark the occasion." His wife awoke and shedding sorrowful tears, did as he commanded. Before long, the eldest son went into Li's mountain to chop wood. By chance, Li was at the foot of the mountain, heard a "ding-ding" sound, and rushed to see what it was. He took a big cudgel to attack him, pulled him onto level ground. Again he made his servant join him, to painfully whip Chen, flaying the skin off his body. Then [the younger Chen] died. Just after, Li cut several switches of bamboo, and piled them in the underbrush. He called out, saying that Chen had taken a knife to rob him, and he had struggled with him. The garrison overseer Wang Gao examined the corpse, and completely reported the affair to the county. Li was sent to prison, and after a short time he also died there, in the same spot where Old Man Chen had come to the end of his days years ago.

This anecdote begins with the failure of the justice system, both through the use of power to affect the outcome of a case and through the death of the prisoner. The appearance of
the white dog and the wife's dream signal that Old Man Chen is intervening from beyond, and indeed what he says to his wife suggests that something may have happened in the underworld to bring resolution to this case. At the end of the tale worldly justice returns in the form of the investigating official, and Li eventually is imprisoned to suffer the same fate as Chen. In this tale, as in the previous one, officials are not capable on their own of carrying out justice, and are depicted as peripheral figures. Thus supernatural intervention is required to rectify injustice.

These are the sorts of situations Zheng Ke would have officials avoid, through competent information gathering and compassion when investigating cases. Officials in the cases chosen by Zheng do not entirely avoid religious aid in rectifying injustice; they do, however, circumscribe the role the spirits play. Although Zheng placed his emphasis on strategies and methods by which an official could deal with such cases, he did not altogether leave out religion or supernatural interventions as a means to rectify injustice. One case included in his collection concerned a man of Luling 廬陵 county who falsely confesses to stealing some clothes and quilts from his neighbor. He claims that he had sold the goods at market, and thus they could not be recovered. Because of the value of the goods, he is sentenced to die. The day the punishment is to be carried out, his "cries of injustice moved the heavens" (冤聲動天) and the case is then reported to the court, resulting in a reinvestigation. The official appointed to carry out the review, a minor functionary of the Bureau of Punishments by the name of Xiao Yan 蕭儼, first fasts and purifies himself, and then prays to the spirits (齋戒禱神). Only then does Xiao proceed to Luling to carry out his duties. Although on the day of his arrival the sky is clear, thunder sounds over the home of the victim of the theft, which frightens to death one of
his cows. The cow is cut open, whereupon the stolen goods are discovered, not yet fully digested, in its stomach. On this account, Zheng comments "This was not [a result] reached by reasoned calculation (智算) but attained through the help of underworld spirits (冥); truly it was [also] the result of sincere pity [for the innocent]."

This seems to be a sort of the stimulus-response (ganying 感應) model at work in the system of administering justice. The cries of the innocent man on his way to his death prompted review of the case, and were said to "move heaven." This characterization seems particularly appropriate given the role thunder plays in the resolution of the case. The greater intervention, however, comes through the official. Xiao Yan's entreaties to the spirits, followed by his travel to Luling, are what ultimately prompt the thunder. Xiao Yan's prayers are also preceded by fasting and purification, activities that place this religious act within the control of officials. Zheng's comment about "sincere pity" for the accused suggests that both the official and the spirits have emotional responses to injustice. Note as well that the spirits to which Xiao prays are not named or described in any way; they are impersonal spirits whose actions are underplayed in favor of the conduct of the official. Indeed the prayers and fasting take place before he sets out for Luling. The spirits respond to him, not to a local situation. Furthermore, if we compare this case with the tale of Mr. Li and Mr. Chen from Hong Mai's collection, there the rectification of justice took place apart from the justice system, whereas in Xiao Yan's case he remained the pivotal agent even though spirits intervened. As a good official, he was able to properly stimulate their response. Finally, in addition to the centrality of the official in the proceedings, the case concluded with the recovery of the stolen goods, providing evidence of the miscarriage of justice.
An even more powerful example of the religious elements of the official’s role appears appended to the second case in Zheng’s collection. This case, which took place in the Western Han 西漢 (202 B.C.E.- 9 C.E.), concerns a young widow who was very filial to her mother-in-law. The mother-in-law kills herself, and her own daughter accuses the widow of murder. The widow gives a false confession under interrogation, and is sentenced to death. The prison clerk (yushi 獄史) argues with the governor, convinced that the widow’s decade of filial service to her mother-in-law attests to her innocence. The clerk is not able to persuade the governor, and the widow is put to death.

This injustice leads to suffering for the whole area:

In the commandery there were three years of drought. Later [a new] governor arrived, and divined the cause. Yu Gong 于公 [the prison clerk] said: “The filial woman should not have died, but the former governor forced the death penalty — perhaps this is to blame?” Thereupon the official slaughtered a cow and personally made a sacrifice at the filial woman’s grave, and placed a testimonial [to her virtue] at her tomb. Immediately the heavens poured down a great rain, and that year’s harvest was bountiful.xxi

Zheng’s remark on this case is that it is a praiseworthy example of “releasing injustice.”

Here there is no criminal to be caught, but the injustice done to the young widow must be recognized to restore the natural order to the area. The first governor was the perpetrator of injustice, and his successor is responsible for correcting it. What is interesting here is that whole area suffers, with the consequences of the error not limited to the daughter who made the false accusation or the official who perverted justice. There are two possible explanations for this: First, it may be that the community is in some sense responsible for not speaking up on behalf of the filial widow and against her accuser, especially as filial behavior reflects positively on the community as a whole. Second, because the official is responsible for the whole district, his actions have consequences
beyond him as an individual. When his successor carries out a sacrifice to restore order, it is accompanied by a worldly acknowledgement, in the form of the testimonial at the grave. His corrections address both the spirits and the community; that is, it is not an exclusively religious solution. This case, in which post-mortem rectification must be made, is appended to a case in which false accusations are corrected and justice done while the woman is still alive.

Based on these accounts, Zheng approves of officials engaging spirits in limited situations. In both of these cases, officials have become intercessors. In the case of the young widow, the prison clerk also represents intervention between the locality and the governor, because he knows of the woman’s many years of filial behavior and thereby represents local knowledge. The officials are also conduits to the supernatural realm. Justice, although coming from the spirits, transits through the official as a response to the official’s offerings. Such cases represent a minority of those Zheng presents. Far more important are the official’s personal characteristics and cleverness in ascertaining the real circumstances of a case. In this way, the fissures of injustice — produced in part out of mistrust of officials, and which often required people to look beyond the government for recompense — were made whole in the figure of the knowledgeable and compassionate official.
Brian McKnight notes that religion and superstition was an area of concern for Song law: "Traditional Chinese governments were notoriously hostile to the transmitters of many popular magical, religious, or quasi-religious beliefs." Brian McKnight, Law and Order in Sung China (Cambridge: Cambridge University Press, 1992), 75, 115.


There are several other important examples of the genre including Tang yin bi shi 棗陰比事, and Yi yu ji 疑獄集. On the parallels between Enlightened Judgments and the Song legal code, see James St. André, “Reading Court Cases from the Song and the Ming: Face and Fiction, Law and Literature,” in Robert E. Hegel and Katherine Carlitz, eds., Writing and Law in Late Imperial China: Crime, Conflict, and Judgment (Seattle: University of Washington Press, 2007), 190-3.

Hawes, "Reinterpreting Law," 33.

Liu Junwen 劉俊文 ed, Zhe yu gui jian yi zhu 折獄龜鑑譯注 (Shanghai: Shanghai guji chuban she, 1988, 71. Hawes also discusses this case, focusing on the unreliability of confessions obtained through torture. Hawes, "Reinterpreting Law," 39.

Hong Mai 洪邁, Yijian zhi 夷堅志 (Beijing: Zhonghua shuju, 1980), 65. The tale is set in 1127-1130. Also translated in Alister D. Inglis, Hong Mai’s Record of the Listener and its Song Dynasty Context (Albany: SUNY Press, 2006), 142-3. Inglis notes a similar story appears in He Wei’s Record of Hearsay, and this emphasizes the degree to which this sort of intervention in the karmic cycle was a common belief at the time. In Hong Mai’s collection, a similar theme is expressed in the tale "Yang Duan Repays Injustice" (楊端償寃), wherein past enmity is likewise rectified through Buddhist means, here through the offering of a feast and a plenary mass for the deceased (shuilu 水陸) as advised by a Buddhist monk.

Although the text is likely apocryphal, it is often said to have been translated by Kumārajīva in the early fifth century. The precept reads: “The Buddha said, Sons of the Buddha do not use anger to requite anger, or blows to requite blows. Even if someone murders your father or mother, or brothers, or [others of] your six immediate relatives one cannot seek vengeance. If the ruler is killed by others one also cannot seek vengeance. Taking a life to avenge a life is not following the way of devotion . . . Now if bodhisattvas who have left home lack compassion and requite enmity, then even if it is
vengeance on behalf of the six immediate relatives it is still a light offense.” (佛言。佛子。不得以瞋報瞋以打報打。若殺父母兄弟六親不得加報。若國主為他人殺者。亦
不得加報。殺生報生不順孝道。) T. 1484.24: 1006b21-26. In an earlier section prohibiting storing weapons, the sūtra says, "The bodhisattva does not even repay the murder of his father and mother —
how much more so other sentient beings!" (菩薩乃至殺父母尚不加報。況 餘一切衆生). T. 1484.24: 1005c16-17. As the Foguang cidian explains "It is forbidden to take
revenge against one's enemies; if one does not obey, then not only will there be harm to
the mind of compassion and forbearance, but moreover vengeance will follow vengeance,
and enmity will have no end. 謂禁止怨仇報復, 否則非但有傷慈悲, 忍辱之心, 復更冤冤相結, 仇怨無窮。 See also the Commentary on the Bodhisattva Precepts Brahma Net Sūtra (Pusajie yishu菩薩戒義疏) by Zhiyi 智顗 and Guanding 灌頂, T. 40, no. 1811:
576c18-24. As early as the Zhou li, the desire to avenge the murder of a parent or relative
was recognized as natural, and indeed moral, although those taking revenge were advised
to notify the authorities so that the second act would not be seen as criminal. On this, see
Michael Dalby, “Revenge and the Law in Traditional China,” The American Journal of

ix The status of monks, although not central to the story, may shed some light on the
willingness of the community to allow someone innocent to be charged with the crime,
and the monk’s own resignation to his fate. The monk begins the story as an outsider, not
permitted entry to the man’s home or farm, and forced to sleep outside the gate. He was
traveling alone and thus outside social bonds, at least temporarily. The monk’s
confession repeats clichéd fears about the clergy: he says he was having an affair with the
woman, persuaded her to run away with him, and killed her when he later became fearful
that they would be exposed. When monks appear in other cases, they are often marginal
figures or behave in unseemly ways.

x Zhe yu gui jian 折獄龜鑑, 47-8.

xi Zhe yu gui jian 折獄龜鑑, 48.

xii At one point Zheng remarks, “Li Chong used craftiness to catch hidden evil, Jiang
Chang used craftiness to investigate a thief, and both were able to release injustice, so
there is no evil in craftiness” (李崇用詭鉤慝, 蔣常用詭察賊, 而皆能釋冤, 斯無惡於
詭也.) In the first case mentioned, a man has abandoned corvée service. His brother then
covers up for him by pretending that a corpse is the evader, and further accuses someone
else of his brother's murder. Li Chong dispatches men to pretend that they have seen the
supposedly dead brother, thereby exposing the brother's deception. In the second case, an
innkeeper is killed and a group of travelers suspected for the murder. Jiang rounds up
everyone at the inn, and then dismisses all but an old woman. When he releases the old
woman several hours later, he has her observed, and arrests the man who approaches her
to inquire about the questioning she has received. See Zhe yu gui jian 折獄龜鑑, 35. In
another case, an official notes a scabbard is unusual, seeks out its makers, and by
establishing who purchased it identified the murderer. This appears in Zhe yu gui jian 折
獄龜鑑, 24-5.
Zhe yu gui jian 折獄龜鑑, 479. In his comment Zheng mentions the legal guide Deng Sixian 鄧思賢, which circulated in the Jiangxi region and was taught in the village schools. Zheng says that it teaches people deceptive methods for getting around the law. According to Miyazaki, in an attempt to maintain total control over the legal system and associated knowledge, the government prohibited this type of text in 1086, although such texts continued to circulated. Miyazaki, “Administration of Justice,” 71.

xiv See comments to case 18; Zhe yu gui jian 折獄龜鑑, 54.

xv Zhe yu gui jian 折獄龜鑑, 40. Li Yuan-su 李元素 was a censor 御史, and answered directly to the emperor. He had been directed to reinvestigate this case, in which it turned out someone had been falsely accused.


xvii As Katz defines it, the Chinese judicial continuum includes mediation within the community, the government-sanctioned legal system, and appeals to the gods. See Paul R. Katz, Divine Justice: Religion and the Development of Chinese Legal Culture (Routledge, 2009), 7, 47-60.

xviii 水陽民李氏，陳氏有爭訟，李氏為秦府幹者，挾勢力，歸曲于陳，陳翁死於獄。經數嵗嵗，其少子在田間，為一白犬所窘，持杖逐之，犬走入李氏之堂，忽不見。是夜翁託夢于妻子曰：“我抱冤憤歷年，今訴理得直，故來報汝。明日可為我設奠以賀。”妻覺而悲泣，如其戒。未幾，長子入李山掘榾柮，李適在山下，聞丁丁聲，趨視見之，取巨梃奮擊曳至平地，又使僕併力痛箠，支體無全膚，即死。旋斫竹數束，疊於蓁莽，唱云陳持刀為盜，與之格鬪。監鎮官汪杲驗其尸，具以實白縣，李生係獄，旋亦死焉，乃昔歲陳翁絕命處也。Yijian zhi, 854.

xix Miyazaki notes that if the convicted person claimed his or her innocence at his final farewells to his family, he was to be retried. Miyazaki, “The Administration of Justice,” 65-66.

xx "Xiao Yan Prays to the Spirits" (蕭儼禱神), Zhe yu gui jian 折獄龜鑑, 65-66. Lulung is located in present-day Jian 吉安 in Jiangxi. The story took place shortly after a change in rules about the punishment for thefts of a certain amount, dated to the Shengyuan 昇元 era of the Southern Tang (937-942 CE). See also Hawes, "Reinterpreting Law," 64 for a discussion of a related case involving a dream. This case differs in that the official carried out no investigation or interpretation; indeed he was not even present where the crime was committed.

xxi Zhe yu gui jian 折獄龜鑑, 2-3. See also Hawes, 61.
Zheng’s emphasis is on the activities of the official, but Yu Gong becomes an example of a worthy official in his own right, and a living shrine is built to honor him. See Sarah Schneewind, “Shrines to Living Officials in Imperial China” (paper presented at the annual meeting of the Association for Asian Studies, Chicago, IL, March 2009), 10-11.