

TRANSGRESSION OF LEGAL TEXT IN LATE JOSEON KOREA – FOCUSING ON “HEUMHEUMSINSEO” – ¹

HYEJONG KANG, Ph. D.

Department of Korean Language and Literature,
50 Yonsei-ro, Seodaemun-gu, Seoul 120-749,
Yonsei University, South Korea
yourhallie@naver.com

ORCID: <https://orcid.org/0000-0002-9236-4121>

Abstract: This article aims to shed light on the transgression of legal text in Late Joseon Korea. Legal text of Joseon contains ‘self-confession’ that reveals the cracks of *yechi* 예치 禮治, dominance under the Confucian norm. In this regard, this article reviews the principles of penal administration and legal culture in late Joseon period which functioned as the mechanism to produce dominant discourses to control transgressions. In particular, focusing on *Heumheumsinseo* 흙흙신서 欽欽新書 written by Jeong Yakyong 정약용

¹ This article is based on the presentation of the conference entitled “Transgression as Secular Value – Korea in Transition?” organized and supported by Nam Center for Korean Studies at the University of Michigan, October 25-27, 2012.

丁若鏞 (1762-1836), which contains most diverse types of legal texts, this article takes the transgression of genre of legal texts into consideration. Through this, how the secular genre of legal text obtains the cultural reality and reveals the suppressed social discourse would be explained.

Keywords: legal text; Jeong Yakyong; *Heumheumsinseo*; *Simnirok*; *Chugwanji*; transgression; Late Joseon.

조선후기 법텍스트의 ‘경계 넘기’- <흙흙신서>를 중심으로-

초록: 조선시대의 법텍스트는 예치 禮治의 균열 지점을 드러내는 ‘자기 고백’을 담고있다. 본고에서는 조선후기 형정 刑政 운영의 원리 및 법문화가 사회 질서를 유지하는 지배규범의 기제로서 작동하는 양상을 검토한다. 또한 조선후기 행정서이자 관례집인 *흙흙신서* 欽欽新書를 중심으로 조선시대의 법텍스트의 장르적 ‘경계 넘기’를 고찰한다. 이를 통해 세속적 장르의 법텍스트가 억압된 담론을 드러내는 문화적 현실성을 획득하는 양상과 의미를 확인해본다.

주제어: 법텍스트; 정약용; *흙흙신서*; *심리록*; *추관자*; 경계 넘기; 조선후기.

TRANSGRESJA TEKSTU PRAWNEGO W PÓŹNYM JOSEON –
NA PRZYKŁADZIE „HEUMHEUMSINSEO”

Abstrakt: Artykuł ma na celu zwrócenie uwagi na zjawisko transgresji w tekstach prawnych okresu późnego Joseon. Ówczesny tekst prawny zawiera ‘wyznanie winy’, które ujawnia naruszenie dominującej normy konfucjańskiej *yechi*. W artykule dokonano przeglądu zasad wymiaru sprawiedliwości i kultury prawnej późnego okresu Joseon, które funkcjonowały w ramach kontroli transgresji jako mechanizmy tworzenia dominujących dyskursów. Analiza treści *Heumheumsinseo* *흙흙신서* 欽欽新書 autorstwa Jeong Yakyonga 정약용 丁若鏞, uwzględniająca zagadnienie najbardziej zróżnicowanych rodzajów tekstów prawnych wyjaśnia także sposób, w jaki świecki gatunek tekstu prawnego wtapia się w rzeczywistość kulturową i ujawnia stłumiony dyskurs społeczny.

Słowa kluczowe: tekst prawny; Jeong Yakyong; *Heumheumsinseo*; *Simnirok*; *Chugwanji*; transgresja; późne Joseon.

1. Legal text: the mirror and prism of society

Legal text contains “the self-confession of society” which consist of “the most anti-social realities in public region obliged to recognize” (Kang Hyejong 강혜중 2009: 125). It clearly shows the gap, disjunction, and conflict between dominant norms or regulations. In addition, it reveals the strategies of the ruling class in bringing perceived reality over to its side. This is why the argument regarding transgression focuses on legal text. Transgression means what has been widely believed as a violation of authoritative prohibition or defiance against it. The transgression reflects the ‘refraction’ of social values and virtues in various legal texts and also the cultural transgression of legal texts functions as a ‘prism’ of pre-modern Korea.

The representative volumes on the legal texts of the late Joseon include *Chugwanji* 추관지 秋官志, *Simnirok* 심리록 審理錄, and *Heumheumsinseo* 흙흙신서 欽欽新書, which were published within the 18-19th century. Through these volumes, we are able to inspect official documents regarding the penal administration, legal principles, legal reasoning, applications, and cultural diversity. Both the juridical and cultural transgression appearing in the legal texts can be explored by reviewing these three books.

In particular, with concentration on *Heumheumsinseo* which contains most diverse types of legal texts and the explanation of legal writing, the transgression of genre of legal text also can be taken into consideration. *Heumheumsinseo* written by Jeong Yakyong 정약용 丁若鏞 (1762-1836) has been highly evaluated as a contribution to his scholarly work of, so-called, *sirak* 실학 實學.

Intriguingly, *Heumheumsinseo* consists of precedents adapted from various literary texts including poem, *jeon* 전 傳 (‘prose on the life of person’), *yadam* 야담 野談 (‘quasi-fictional tale’) or *yasa* 야사 野史 (‘unofficial historical story’), novel, and personal notes in

addition to official documents of relevant criminal cases.² This textual hybridity or heterogeneity represents the secularity of cultural transgression, of which associated cultural validity stems from both the literary texts, which have been categorized as being inferior due to their informal nature, as well as lowbrow texts and notes based on personal experiences from the author who were dismissed from his administrative post. Such legal texts provide us with the opportunity to observe what was perhaps silenced or suppressed in the social system, showing a type of transgression that challenges the authority and orthodox methods of the traditional convention.

2. Legal system and culture in late Joseon

As it is generally known, during the Joseon dynasty, the *Great Ming Code* *대명률* *大明律* was applied to criminal cases in principle. However, as Choi Chongko *최종고* has pointed out, “Korean people were regulated by these Confucian legal norms of Chinese origin and there were often conflicts between these Chinese rules and Korean indigenous customs” (Choi Chongko *최종고* 2006: 220-252). Therefore, specific domestic crimes were mainly regulated by penal law in the following texts: *Gyeonggukdaejeon* *경국대전* *經國大典*, *Sokdaejeon* *속대전* *續大典* and *Daejeontongpyeon* *대전통편* *大典通編*, among others.

In the late Joseon period, an intensification and diversification of crimes had increased. However local officials failed to keep up with such social changes and fell short of implementing the newly systemized penal ministrations. As a result, more penal laws and specialized publications for penal administration were established than ever before. Moreover, the pursuit of efficient rulings of local society

² The uniqueness and importance of its written style was analyzed in earnest for the first time through a close examination of its textual characteristics by Kang Hyejong 강혜중 (2009) in aforementioned thesis. This previous study had explored not only ‘the cross sections’ of realities being mirrored through an array of criminal cases, but also the way their descriptions acted as ‘cracks’ which had been engendered from and within multi-layered discourses under the cover of dominant social norms.

led to publications of numerous administrative handbooks for magistrates.

Nonetheless, systemized books for executing criminals still barely existed. This was primarily due to the negative perceptions on the execution of penal law deeply rooted in Confucianism and a lack of knowledge of laws. Therefore, officials were required to improve their understanding of the penal law and administration. Under such social atmosphere, at the command of King Jeongjo 정조 正祖 in 1781, the Minister of Justice Kim Nojin 김노진 金魯鎭 appointed practitioner Park Ilwon 박일원 朴一源 for the publication of *Chugwanji*. Since its first publication, it was revised several times with the final version being completed in 1791. At the same time, King Jeongjo also proceeded to publish *Simnirok*, which organized and categorized written judgments and other criminal records by year and religion.

The following paragraph written by King Jeongjo appears in *Chugwanji* and suggests the basic concept and intention to promote the publication of legal texts.

“Generally, punishment serves as the means to sub-serve rulings. It motivates people to avoid sin and enforces proper behavior, helping them to avoid being imposed by penalties. I hope the people will not violate this law, but if they do, the level of punishment should be carefully considered depending on whether to punish or forgive them in the pursuit of the elimination of punishment. Isn't it marvellous?”
(*Chugwanji*, vol. 1. *Heumheuljeonchik*. Joseon Sidae Beopryeong Jaryo. Translation by the Author)

The quote above is from “Eojeong Heumheuljeonchik Yuneum 御定欽恤典則綸音” written by King Jeongjo and it is included in *Chugwanji*. In the above passage, punishment is regarded as a supplementary measure or a necessary evil for the existence of an idealized “society without punishment”. As such, the prudent attitude toward imposing punishment was regarded as being generated from in 仁 which is the *Gunja* 君子 (‘Confucian gentleman’)’s virtue of

³ The original text is as follows: “蓋刑者，輔治之具也。使民而遠罪，以有是也，使民而遷善，亦有是也，欲其不干于是也。如其干也，而又底慎於適輕適重之分，惟辟非辟，惟有匪宥，欽哉。期于無刑，豈非祥歟?”(추관지 권 1, 훈훈전집, 조선시대법령자료, http://db.history.go.kr/law/item/level.do?levelId=jlawb_200_0010_0090_0020_0130&position=1 (accessed December 6, 2020).

loving people. The principle of regulation of this world was *ye* 예 禮 ('the rules of propriety') which "[c]overs the entire gamut of ceremonial or polite behavior, secular as well as religious" (Bodde and Morris 1967: 19), underpinning the operation of Joseon.

This standpoint is in contrast with that of legalist *beopga* 법가 法家 Shang yang 商鞅, who said, "*Ye-ak* 禮樂 ('decorum and music') is a sure sign of obscenity and debauchery", while, "Punishment gives birth to strength, strength to tenacity, tenacity to dignity and dignity to virtue. Therefore, virtue is the offspring of punishment and strongly advocates the necessity of punishment." (Jeon Myungyong 전명용 et al. 1990: 390).

It seems that King Jeongjo and government officials adhered to the traditional Confucian stance for law and punishment which could never be unilaterally discarded in reality. However, at the same time, King Jeongjo's active attempts to arrange official records for penal administration by publication indicates his will to unveil transgressions and process them properly.

The following quote from "Weizheng 爲政" in *The Analects of Confucius* is a manifestation of the perspective of law and punishment under Confucian norm.

"The Master said, 'If the people be led by regulation, and uniformity sought to be given them by punishment, they will try to avoid the punishment, but have no sense of shame. If they be led by virtue, and uniformity sought to be given them by the rules of propriety, they will have the sense of shame, and moreover will become good.'" ⁴
(*Weizheng*, Chinese Text Project Online)

It has been generally believed and 'outwardly declared' that the rectification of people the above mentioned could be only made by *deok* 덕 德 and *ye* 예 禮. This Confucian virtue was believed to lead to an idealized society ruled by the sage king which is based on the idea of *seongseonseol* 성선설 性善說 ('the theory that human nature is fundamentally good'). From this perspective, Mencius referred to

⁴ The original text is as follows: "子曰：道之以政，齊之以刑，民免而無恥，道之以德，齊之以禮，有恥且格。" The English translation of this quote from the Chinese Text Project Online Open Access Digital Library (<https://ctext.org/confucianism?searchu=%E9%81%93%E4%B9%8B%E4%BB%A5%E6%94%BF>; accessed December 6, 2020) has been partially modified by the Author as needed.

suojisim 수오지심 羞惡之心 (‘a sense of shame’), as one of the four innate virtues given to man by the universe.

This system of self-sanction as ashamedness has been mentioned to be better than a system of penalty. Yun Gi 윤기 尹愷 (1741-1826), an elite who lived in the late Joseon period, wrote an essay entitled “To make one feel shame is even more severe than to punish one (恥之甚於刑之)” in his collection of literary works *Mumeongjajip* 무명자집 無名子集. In this context, shame, as Murphy pointed out, shows the “subtle but important” difference from “guilt”. He argues that causing one to feel “shame” is a more powerful tool than “guilt” by “disobedience to authority,” as shame triggers a “narcissistic wound” (Murphy 2012: 94-113). This thought supports the theory that the primary practical notion to judge and regulate transgression in the Confucian system was centered on the internalization of ashamedness to prevent ‘disenchantment’ from the fear of ashamedness.

In this mechanism, if one violated social norms and regulations, he or she was not only made to feel shame alone but also on their family, brought on by the inner cultivation of Confucian virtues. This is one of the more adequate grounds for explaining the concept of punishment as a complementary measure to preventing transgression in the traditional legal system. However, through this mechanism, transgression could not be eliminated and was made ironically for the better.

“I think *siyeok* 弑逆 (regicide and parricide) should be subject to capital punishment without consideration of the circumstances. No history book is known to contain such cases and only in *Yucheongjip* 留靑集 are there cases of murder involving mother, elder brother, husband and master etc.” (Pak, Seokmu 박석무 and Jeong Haeryum 정혜림 1999: 45-46; translation by the Author)⁵

The above excerpt from “Kyeonsayoui 경사요의 經史要義 (Essential Meanings of the Classics and Histories)”, the first chapter of *Heumheumsinseo* hints at the importance of the silent response to social humiliation. The main reason why Jeong tried to collect more specific cases is because it was considered a taboo to even speak of serious offences in public places for debate. Consequently, some of

⁵ This quotation had been analyzed by Kang Hyejong 강혜중 (2009: 50-51).

the significant transgressions regarded as taboo were rarely found in written records, which hindered jurisprudential scrutiny.

Therefore, the true nature of the transgressions that violated the Confucian norm was difficult to grasp. Such example could be traced along in the following specific case mentioned in an unofficial historical story included in *Heumheumsinseo*. In the story a so-called *hansa* 한사 寒士, which means a ‘male scholar *sunbi* 선비 in poverty’, is forced into performing fellatio and ends up killing his offender by afflicting a dental wound in his penis. There is a subsequent debate on whether the *hansa*, the victim of the sexual harassment, should be charged with manslaughter. While asking for sympathy on behalf of the victim, citing extenuating circumstances, the administrator in charge of the case asks his superior and governor, “Wouldn’t you also attempt to hurt your sexual offender orally if you were the one being sexually assaulted?” He is quickly condemned by his superior for making “an obscene” comment (Pak, Seokmu 박석무 and Jeong Haeryum 정해림 1999: 83-84)⁶.

This shows how the case about a man who was sexually harassed, is subsequently processed and how accumulated Confucian values controls the mechanisms of social abhorrence and regulates transgression via ‘the experience of collective disgrace.’ Therefore, disgrace becomes a measuring stick for judgment of transgression and the most potent form of social censoring system, while paradoxically assuming the role of an obstacle for the rational solution to the problem of transgression, which also leads to the underexposure of specific legal cases to officials.

3. Legal text as a transgressive media

Legal documents such as criminal records, interrogation reports, and judgments were penned by from petty official to the king in charge of each part to process criminal cases. All the three books of *Chugwanji*, *Simnirok* and *Heumheumsinseo* contain such legal documents selected according to their respective object.

⁶ This case is dealt with in detail in Kang Hyejong’s thesis (Kang Hyejong 강혜중 2009: 52-53).

The structure of *Chugwanji* is largely based on the roles and types of criminals, while *Simnirok* includes all the cases classified by year and region. For example, in the case of “Sangbokpu 상복부 詳覆部” a chapter of *Chugwanji*, it is made up of five sections classified by the nature of the crimes: “Gyebok 계복 啓覆 (Re-trying a Condemned Criminal)”, “Yunsang 윤상 倫常 (Three Bonds and Five Relationships in Confucianism)”, “Boksu 복수 復讐 (Revenge)”, “Ganeum 간음 姦淫 (Adultery)”, and “Simni 심리 審理 (Trial)”. While each section of *Simnirok* contains a list of cases, named after a criminal, sorted by the year of their occurrence followed by the respective region. In other words, the contents of *Simnirok* are not reconstituted based on the theme or the objective and the editor’s intention is not apparent in the textual structure. These two books only consist of official documents about criminal cases.

On the other hand, *Heumheumsinseo* consists of five chapters including literary texts: “Kyeongsayoui 경사요의 經史要義 (Essential Meanings of the Classics and Histories)”, “Bisanguncho 비상준초 批詳窩抄 (Critique on Exemplary Criminal Records)”, “Sanghyeongchui 상형추의 祥刑追議 (Detailed Analyses of Criminal Cases)”, “Uiyulcharye 의율차례 擬律差例 (Differential Classification of Legal Application)”, and “Jeonbalmusa 전발무사 剪跋蕪辭 (Humble Discourses over the Cases under the Lights at Night)”. Each chapter is systematically organized with the whole book itself identifying the general objective of the penal administration. It also includes a wide range of precedents including those from China and Korea as well as private experiences. The source of the cases discussed in *Heumheumsinseo* are at times described in detail while others are not, but it is clear the Jeong Yakyong has included a wide range of cases he found in various literature including unofficial historical stories, law books, Buddhist scriptures, and novels etc.

The process for penning legal records constitutes reproducing a series of probable stories by those involved in the incidents. It is often discovered that rhetoric was actively used, strategically, as a means of persuasion to provoke the readers’ empathy in the criminal records. This pertains to the fact that legal text, which consists of extreme conflicts between characters, is hermeneutic and also contains characteristics that give it literary value. Especially, literary texts adapted in *Heumheumsinseo* manifest this feature clearly.

In its first chapter, “Kyeongsayoui”, unofficial historical stories and quasi-fictional tales were included as precedents for the

awareness of the extended reality, so that it could be acknowledged as having the same value as an official historical incident. In addition, novels by Yu Xiangdou 余象斗, so-called *gongan xiaoshuo* 公案小說, which deal with the story of a government office solving a crime, are included in the second chapter entitled “Bisangjuncho” as model cases for penal administration. This was considered an unprecedented cultural transgression at the time as it led with a literary genre novel, which had never before been acknowledged by the institution due to its overly secular nature into the nobility’s mainstream literature.

Such as quasi-fictional tales and novels were of secular genres that often described the transgression of social taboos in a sensuous manner and, hence, genres that were not easily adopted and openly enjoyed by the nobility. Jeong Yakyong acknowledged the perspectives and utility of the cases reenacted in the texts that reflected such secular values and refused to cling to the convention and authority of the texts, adding new value in accordance with the objective of *Heumheumsinseo*’s publication. This diversity brings out the true nature of such controlled anti-social discussions and highlight peculiar stories from within *Heumheumsinseo* as probable truths.

The literary texts of *Heumheumsinseo* were similar in a way that they all were useful educational material that effectively described to the readers the various cases of transgression and how they were legally processed. The stories that previously existed in different strata begin to take on an equal position as they become the subject of his probable case studies based on his perspective and are transformed into case samples worthy of being consulted for a trial. The classification of the stratum of different stories in *Heumheumsinseo*, in the traditional sense, has become meaningless. In other words, this book has not only demonstrated the transgression of legal text by crossing the cultural boundaries and but also reflected the awareness of cultural transgression at that times.

In pre-modern East Asia, there have been continuous discussions on *a* 雅 and *sok* 俗 (‘refined’ and ‘vulgar’) as aspects of criticism that operated on the control and management of traditional culture. During this process, *a* 雅 was considered to be right or legitimate, while all that was secular were considered heretical that have lost their legitimacy. Following this tendency, the concept of ‘雅 and 俗’ appears in Liu Xie 劉勰’s *Wenxindiaolong* 文心雕龍 as a critical terminology, exerting significant influence on literary criticism, demonstrating that social regulation of artistic value is

continually occurs in the cultural sector as well. During this process, cultural products that were not considered mainstream were classified as inferior and *migam* 미감 美感 (‘aesthetic feeling’) were controlled and managed within this mechanism. From this point of view, Jeong Yakyong broke down the cultural boundaries through *Heumheumsinseo*.

When a subculture that is created and enjoyed by the people gains a certain power, it gains logic against regulations. Therefore, crossing cultural boundaries can change the perception of people who enjoy culture, and ultimately support the possibility of bringing about change to the value of dominant social ideologies. From this point of view, legal texts in *Heumheumsinseo* shows the breaking down the respective cultural boundaries through text style.

The story like “제사번간 題辭煩簡 (The Complexity and Simplicity of Magistrate’s Judgment)” which pokes fun at magistrate whose foolishness could not be openly discussed in public but yet could be passed on in the form of secular texts. This story is included in the collection of fun short stories titled *Eosusinhwa* 어수신화 禦睡新話, written in Chinese characters in 1812 during King Yongjo’s reign by Jang Hanjong 장한중 張漢宗 (1768-1815), who was an officially appointed court painter. Such story exposes and criticizes the inabilities of authoritative figures who, “[b]eing familiar with just 시부 詩賦 (‘a poem and fu’) in Chinese character or 잡예 雜藝 (trial talents)”, become completely inept when are appointed governor and give their duties to their conniving petty officials, “[b]eing at a complete loss as a result” as Jeong Yakyong mentioned in the preface of *Heumheumsinseo*. The power of subversive genre of legal text reveals the reality of legal system.

4. Conclusion

Until now, we have taken a close look at the transgressions and secular values centered on legal texts from late Joseon era. By examining the perception of law and penal administration of Joseon society, we looked at the way that transgressions are generated and regulated in legal system and discovered how cultural transgressions are triggered through the editing method of the legal texts.

In the Confucian system of Joseon, the transgression has been judged and regulated in the mechanism of internalization of ashamedness to prevent disenchantment from the fear of ashamedness. Therefore, in the legal texts written by authorities or literati, it is often found that they attempted to create a narrative that would patch up the social disjunction and conflict within the discourse and the system of Confucianism. It is because transgressions were regarded as evidence to prove that *deokchi* 덕치 德治 ('the rule of virtue') was not reflected in reality.

This article reviewed the transgression of legal texts which consists of multi-layered range of genres revealing what has been silenced against the dominant norm. *Heumheumsinseo* organically composed of not only incorporating various judicial theories and cases, but also Jeong Yakyong's personal experiences as a government official as well as his memoirs from his days of exile. Although the legal texts in *Heumheumsinseo* were planned to be reference for magistrates in investigating criminal cases, they provided counter-hegemonic discourse that was silenced in official documents.

Bibliography

- Bodde, Derk, and Clarence Morris. 1967. *Law in Imperial China*. Massachusetts: Harvard University Press.
- Choi, Chongko (최종고). 2006. Law and Custom in Korean Society: A Historical and Jurisprudential Approach. *서울대학교 법학 Seoul Daehakgyo Beophak (Seoul Law Journal)* 47: 220-252.
- Chugwanji 추관지 秋官志. Joseon Sidae Beopryeong Jaryo 조선시대 법령자료 (Database on the Laws and Regulations of the Joseon Dynasty). http://db.history.go.kr/law/item/level.do?levelId=jlawb_200_010_0090_0020_0130&position=1 (accessed December 6, 2020).
- Chugwanji 추관지 秋官志. vol.1. 1975. ed. 법제처 Beopjecheo (Ministry of Government Legislation). 서울: 서울印刷株式會社 Seoul Insoe Jusik Hoesa.

- Gukyeok Simnirok* 국역 심리록 (*Simnirok in Korean Translation*)
6 vols. 1998-2007. 서울: 민족문화추진회 Seoul: Minjok
Munhwa Chujinhoe.
- Jeon, Myungyong (전명용), Jeon Hongcheol (전홍철), Yun
Byeongsu (윤병수), Sim Gyuho (심규호), and Yang
Chungryeol (양충렬), trans. 1997. *중국고대윤리학 Jungkuk
Godae Yullihak (Chinese Ancient Ethics)*. 서울: 이론과 실천
Seoul: Yiron-gwa Silcheon.
- Kang, Hyejong (강혜종). 2009. *흠흠신서의 구성과 서술방식 연구
(Heumheunsinseo-ui Guseong-gwa Seosul Bangsik Yeongu)*.
M.A. Thesis, Yonsei University.
- Kim, Youngjun (김영준). trans. 2010. *어수신화 Eosusinhwa
禦睡新話*. 서울: 보고사 Seoul: Bogosa.
- Mumyeongjajip* 무명자집 無名子集. 2000. 한국문집총간 Hanguk
Munjip Chonggan. 서울: 민족문화추진회 Seoul: Minjok
Munhwa Chujinhoe.
- Murphy, Jefrie G. 2012. *Punishment and the Moral Emotions*. New
York: Oxford University Press.
- Pak, Seokmu (박석무) and Jeong Haeryum (정해럼), trans. 1999.
*역주 흠흠신서 Yeokju Heumheumsinseo (Heumheumsinseo
in Korean Translation with Annotation)* 3 vols. 서울:
현대실학사 Seoul: Hyundai Shihaksa.
- Weizheng*. Chinese Text Project Online Open Access Digital Library.
<https://ctext.org/confucianism?searchu=%E9%81%93%E4%B9%8B%E4%BB%A5%E6%94%BF> (accessed December 6,
2020).
- Yu, Xiangdou 余象斗. 1990. *Lianming qipan gong'an (廉明奇判公
案)*. Shanghai: Shanghai guji chubanshe (上海古籍出版社).
- Yu, Xiangdou. 余象斗 1999. *Lianminggong'an zhusigong'an (廉明公
案諸司公案)*. Beijing: Qunzhong chubanshe (群眾出版社).
- Yukjeonjorye* 육전조례 六典條例. 1969. Ed. 법제처 Beopjecheo
(Ministry of Government Legislation). 서울: 서울印刷株式
會社 Seoul: Seoul Insoe Jusik Hoesa.