Proceedings of the 5th International Conference on Interdisciplinary Humanities and Communication Studies
DOI: 10.54254/2753-7064/2026.39117

Features and Contributing Factors of Tulai in the Mid-Qing Period

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Abstract. In legal terms, tulai in the mid-Qing period was marked by pronounced ethical framing rooted in mourning-apparel kinship norms and an emphasis on the status-order system. Socially, it was defined by the instrumental exploitation of corpses and deaths. These characteristics arose from a confluence of multiple factors. At the legal level, the Qing multi-tiered judicial review system furnished critical preconditions that made tulai feasible. The regard for homicide cases was turned into a tool for perpetrators who commits tulai to exert pressure, while loopholes in grassroots judicial practice created further opportunities for activities like tulai. At the social level, growing numbers of social-intermediary groups became involved in tulai. Litigation masters and village headmen stood out most prominently among them. They facilitated or even directly took part in tulai plots by offering legal assistance, intelligence and other forms of support. At the political level, the imperial attention directed toward tulai cases stemmed not only from the emperor's concern for the status-order system, but also from his endeavour to counteract the bureaucratic documentary apparatus. These traits reflect an intricate interplay of multiple interwoven factors. This study would shed light on legal practices in late imperial China and their relationship with the everyday lives of ordinary people.

Keywords: Tulai, Mid-Qing, Litigation Masters, Multi-Tiered Judicial Review System

1. Introduction

Tulai means killing others, especially one's own offspring or slaves, or using their corpses for the purpose of falsely accusing others. It denotes a form of false accusation frequently tied to corpses and instrumental filicide. Owing to its close connection with loss of human life, successive statutory provisions targeting this practice proliferated from the Ming dynasty onward. By the mid-Qing period, tulai was no longer merely the name of a criminal offense; instead, it had evolved into a composite issue encompassing legal construction, social practices, and political governance. Accordingly, research on this subject affords a vantage point from which to examine the judicial system and social functioning in mid-Qing China.

Existing scholarship on tulai has largely focused on its social-behavioural dimensions [1]. Still another strand of scholarship compares cases of "instrumental filicide to lodge a false accusation" (killing descendants to frame others) and "false accusation of unfiliality", discussing tulai against the backdrop of Qing status-order construction [2].

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DOI: 10.54254/2753-7064/2026.39117

Taken together, prior studies have illuminated the phenomenon of tulai from social context, legal institutions, cultural perceptions, and regional variations, furnishing rich background for understanding tulai in Late imperial China. Nevertheless, existing works tend to privilege its social-behavioural facets, paying comparatively insufficient attention to legal construction and central state governance. Furthermore, discussions of its social dimensions have largely overlooked intermediate social actors who actively participated in tulai. Hence this topic warrants further in-depth investigation.

This article draws principally upon The Great Qing Code (Daqing lüli), Routine Memorials of the Punishment Section (Xingke tiben), Veritable Records of the Qing Dynasty (Qing shilu), A Conspectus of Judicial Cases (Xing'an huilan), and local archival materials. Through examining the evolution of legal texts, analysing relevant cases, and contextualising adjudicative practice, it investigates three interconnected dimensions: the statutory offence of tulai in Qing law, tulai as practised in local society, and tulai cases that drew central-state attention. It seeks to unpack the defining characteristics of tulai in the mid-Qing, as well as the factors conditioning its real-world occurrence and judicial disposition. By exploring tulai, it can help better grasp the governance logics behind shifts in Qing state law, how local social actors leveraged state institutions to pursue forms of bargaining, and why the central state continuously imputed political significance to such incidents. Accordingly, tulai affords a concrete analytical entry-point for studying mid-Qing homicide institutions, grassroots justice, and social crime. It also advances the understanding of the historically interactive and mutually-shaping relationship between the Qing state, law, and society.

2. Characteristics of tulai in mid-Qing dynasty

Legally speaking, the term tulai specifically refers to offences falling under the statute "killing descendants or slaves to lodge a false accusation against others" (Sha zisunji nubi tulairen). This describes acts in which superiors or household heads kill juniors or hired workers and then falsely incriminate third parties. When discussed in social contexts, tulai covers a broader range of practices. The Qing legal scholar Shen Zhiqi offered a broader definition in his 1715 Code of the Great Qing with compiled annotations (Daqing lü jizhu): "To engage in tulai means to plot to incriminate and extort money from a party who bears no connection to the original incident [3]." At the politico-judicial level, tulai refers to the formally docketed cases that have entered the adjudicative process. In short, tulai designates false accusation for profit tactics that exploit corpses and deaths. Yet under the shared label of tulai, the phenomenon displayed distinct legal and behavioural characteristics across different periods. Examining these variations helps illuminate the substantive historical evolution that has unfolded beneath this conceptual framework.

2.1. Statutory provisions and legal connotations of tulai in Qing law

The statute "killing descendants, slaves and hired labourers to lodge a false accusation against others" in The Great Qing Code retained the exact wording of The Great Ming Code. Sub-statutes, by contrast, saw considerable expansion regarding the definition and punishment of tulai.

The sub-statutory revisions lay shifts in the substantive meaning of tulai in legal text. Compared with Ming statutes and early-Qing formulations such as Shen Zhiqi's 1715 definition, mid-Qing understandings of tulai expanded along two dimensions: definition of the crime and corresponding sanctions.

From this perspective, a classificatory analysis of the relevant legal revisions helps understand the expansion. Table 1 compares original statute provisions with mature Qianlong-Jiaqing-era sub-

DOI: 10.54254/2753-7064/2026.39117

statutes across four analytical dimensions: subjects of application, source of corpses, legal interests infringed, and consideration of consequences.

Table 1. Shifts in dimensions of the tulai offence

Dimension	Statute text	Post-Qianlong-Jiaqing sub-statute revisions	Changes relative to original statute
Subjects of application	Grandparents, parents and descendants; household masters and slaves or hired labourers	All kin within mourning apparel system; all social ruffians empire-wide	Subjects expanded beyond nuclear-family and master-servant hierarchies
Source of corpses	Corpses of relatives whom offenders had intentionally killed or who had died naturally	Includes suicides and unidentified corpses; differentiates sanctions by corpse-owner's status	Broadens permissible sources of exploited corpses; reinforces status-centred considerations
Legal interests infringed	Homicide, false accusation, ethics	Continues to prioritise ethical norms; additionally addresses clan-property order, social peace, and judicial-trial order	Evolves into a composite crime implicating ethics, public security, property, and judicial procedure
Sentencing considerations	Emphasis on status factors; little weight given to consequences	Sub-statute of Qianlong 58 imposes harsher punishments for tulai producing grave consequences	Behavioural consequences become an aggravating sentencing factor

In terms of criminal definition, Qianlong and Jiaqing era sub-statutes pushed tulai beyond the boundaries set by original statute texts. Statutory tulai focused on intentional instrumental killing, corpse-based framing, and extortion of property within nuclear-family and master-servant relationships. After sub-statue revision, perpetrators came to include social ruffians; relational scope extended to clans, clan-owned property, and complex mourning-grade kinship structures. Legal harms expanded from homicide and false accusation to encompass ethics, public security, property, and judicial order.

About legal sanctions for offences, these revisions refined the correspondence between relevant punishments and offences. Table 2 compares penalties assigned to different tulai-related acts before and after revision.

When it comes to sanctions, mid-Qing revised sub-statutes display a trend toward harsher punishment. On the one hand, several sub-statues eliminated amnesty clauses and adopted wording such as "whether the perpetrator is a commoner or a senior-junior relative", shrinking room for discretionary leniency in tulai cases. On the other hand, for acts producing grave outcomes especially grossly violating ethical hierarchies, punishments escalated from military exile and bamboo strokes to strangulation pending autumn review and immediate decapitation. Most notably, the sub-statue was enacted in Jiaqing 24 (1819) prescribing immediate decapitation for tampering with parental corpses for tulai demonstrates that punishment for tulai moved beyond ordinary extortion-and-frame-up logics and assumed ethical-aggravated penal characteristics.

Taken together, mid-Qing legal understandings of tulai no longer referred exclusively to false-accusation plots engineered by household seniors or masters. Statutory content gradually absorbed real-world social tulai practices, illustrating how Qing law refined itself to meet governance demands. Meanwhile, revisions strengthened status-order and ethical-value components embedded in the original tulai offence. This reflects the state's deployment of pre-existing social status-order

DOI: 10.54254/2753-7064/2026.39117

norms, as well as a legal process that recruited popular daily perceptions and conduct into imperial governance.

Table 2. Changes in sanctions for tulai offences

Type of sub-statute	Pre-revision penalty	Post-revision penalty	Magnitude of change
Mourning-apparel tulai	Not explicitly stipulated in original statute	Punished according to the statute "offending against senior-junior status by false accusation"	New penalty introduced
Spousal tulai	Not explicitly stipulated in original statute	Analogous sentencing applied separately to husbands and wives	New penalty introduced
Amnesty provisions for tulai	Amnesty possibilities existed	Provision deleted	Opportunities for leniency reduced
Intentional killing of juniors for tulai	Military exile	Penalty retained, scope of application enlarged	Severe punishment stabilised
Ruffians exploiting corpses for tulai	Sanctions originally applied only to bannermen inside the capital	One hundred heavy bamboo strokes plus two months of cangue exposure; equal treatment for bannermen and commoners	Scope of punitive application broadened
Secondary homicide triggered by tulai	One hundred strokes plus three-year penal servitude	Strangulation pending autumn review	Penalty aggravated
Tampering with parental corpses for tulai	Not explicitly stipulated in original statute	Immediate decapitation	Penalty aggravated

2.2. Characteristics of tulai practice and priorities in adjudication

What distinguishes tulai from ordinary false accusation is its instrumental manipulating of corpses. In other words, constructing and interpreting a death in ways favourable to constitutes the core feature of tulai.

Perpetrators of tulai would deliberately craft an account of death to gain the upper hand in bargaining against their intended victims. The example was the tulai case of Zhao Dashi in Chenzhou, Hunan (Jiaqing 20, 1815). Zhao Dashi murdered his hired labourer Deng Yazi and deposited the corpse in the workshop of Li Shoulin, with whom he harboured a grudge. He then threatened to report Li for homicide and successfully extorted eleven taels of sliver [4].

This case illustrates the instrumental utilization of death in tulai. Zhao selected Deng, who had no prior connection with Li, as his victim, precisely to hinder prompt identification of the corpse's origin and enable him to advance a self-serving narrative. He deposited the corpse in Li Shoulin's workshop late at night to minimise traces, leaving the target of his frame-up at an informational disadvantage. The next day he pretended to chance upon the body and threatened to bring a murder charge, wielding his polished death narrative in negotiations. Li Shoulin, unable to identify the corpse, yielded and offered money for a settlement. His reaction proofed that Zhao Dashi's strategy had succeeded.

The interpretive construction of a death for tulai need not precede the actual fatality. Another case happened in Shandong demonstrates that perpetrators could also fabricate advantageous narratives after a death had already occurred. It shows that perpetrators of tulai could seize interpretive

DOI: 10.54254/2753-7064/2026.39117

authority over corpses not only after death, but also can happened before it. Through social networks and litigational stratagems they manufactured favourable factual reconstructions to pursue profit or evade punishment. This kind of discursive contest over interpretations of death and case facts were critical point of struggle in tulai lawsuits, and indeed in many other Qing criminal proceedings.

Adjudication of tulai cases operated with different priorities. If manipulating corpses and death-narratives defined the practice of tulai, then judicial hearings focused on status definition and corresponding behavioural norms. As shown above, statutory revisions for tulai display a tendency toward mourning apparel system and corresponding aggravated sentencing.

As for the mourning apparel system, the factors about status exerted influence on sanctions. A collation of the relevant statutes yields the table 3 below.

Table 3. Changes in sanctions involving senior-junior relations in revised tulai sub-statutes

	Penalty aggravated	Penalty mitigated or unchanged	Total
Junior perpetrates offence against senior	1	0	1
Senior perpetrates offence against junior	3	1	4
Cases implicating both senior-junior dimensions	3	0	3
Total	7	1	8

In effect, crimes classified as tulai undermined the status-order system anchored in ethical hierarchies. Reviewing the Luo Youliang case, the Qianlong Emperor observed that trials for potential tulai offences "bear consequences not merely for the fittingness of charges, but also for fundamental ethical relations (Lunji)". When ordering Hu Jitang and Ji Qing to conduct direct hearings, he emphasised that "ethical hierarchies are at stake so that the full truth must be painstakingly elicited". The Jiaqing Emperor (Yongyan, 1760-1820), similarly reviewing tulai cases, underscored their nature as "heinous offences against ethical norms" and warned that sentences might easily disproportionate sentencing.

This top-level preoccupation with the ethical dimensions of tulai directed judicial emphasis toward status identification. Put differently, the status relationships linking the tulai perpetrator, the victim, and the corpse constituted the most important adjudicative consideration; concrete motives assumed secondary weight. In the case of Liu Da, for instance, the core judicial task was establishing mourning-apparel kinship ties among Liu Da (the tulai perpetrator), the deceased Liu Erxiao, and the framed Zhang Shixuan, so that charges and punishments could match statutory provisions according to status. Since Liu Da stood in the uncle-nephew relationship to the victim Liu Erxiao, the court prescribing nearby-region military exile. Given that Liu Erxiao had survived his wounds and fully recovered, the final sentence was commuted to penal servitude. Disagreement arose between the provincial governor and the Board of Punishments over sentencing. The governor argued that Liu Da's conduct was egregious in equity and called for heavier punishment. The Board of Punishments insisted on upholding status-based sentencing principles and maintained the penal-servitude sentence. Their dispute in essence revolved over the relative weight of equity-based reasoning versus status-based norms. For most tulai trials, mourning-apparel ethical hierarchies remained the decisive factor. Thus status-order represented a central consideration in Qing law and judicial adjudication.

Tulai happened in mid-Qing carried strong mourning-apparel and ethical-law characteristics. The practice of tulai itself was intimately bound up with corpses; competing interpretive accounts of death constituted its key feature. Adjudication of tulai cases, in turn, gave special priority to status-related factors. Such traits reflect shifts in mid-Qing social conditions. More concretely, mid-Qing

DOI: 10.54254/2753-7064/2026.39117

tulai behaviour was shaped by legal, political and social forces, which therefore merit further examination.

3. Factors shaping tulai in the mid-Qing period

The emergence and unfolding of tulai were conditioned by multiple factors. Existing scholarship mostly situates them under economic distress. In reality, however, tulai was not exclusively an extreme response to material hardship; it could also represent a purely profit-driven enterprise. While mounting social contradictions contributed to its appearance, other drivers included expanded statutory applicability of the tulai offence, flaws in Qing judicial procedure, intervention by social-intermediary actors, and political attention from the central state stemming from governance imperatives. Accordingly, analysis proceeds along legal, social, and political dimensions.

3.1. Expansion of statutory definitions and judicial procedure

As described above, successive revisions broadened the substantive scope of the tulai offence. A turning point came with the Yongzheng 3 (1725) and Qianlong 5 (1740) revisions to the same sub-statute concerning "ruffians dragging corpses for false accusation" [5], which brought non-kin social actors within statutory domain. This marked the point at which tulai statutes began to cover widespread ruffian who perpetrated tulai practices. Consequently, the rising number of tulai cases recorded in the mid-Qing central archives does not necessarily mean that objectively observable tulai happened more numerous. Instead, many incidents that would formerly have been categorised under other offences were reclassified as tulai and thus entered central archival records.

Another major contributing factor lay in the Qing system of tiered review for homicide cases. Within Qing case classification, homicides belonged to "serious offences of homicide and robbery" (Mingdaozhongqing), distinct from "minor civil suits" (Xigu) which could be suspended during farming seasons and the ending of year. Whenever a magistrate encountered a homicide, he was required to report it to provincial governors within statutory limited period and initiate multi-level review procedures. Cases implicating mourning-apparel kinship involved even more intricate formalities and frequently required autumn assizes sentencing. Institutional design aimed to ensure appropriate punishment matching the crime and realise the goal of "exercising scrupulous caution over human life" (emphasize the value of cherishing human life).

Yet this same institutional arrangement created openings for tulai. For a tulai plot to succeed, the false accusation first needed to be accepted by yamen authorities so pressure could be brought to bear on the intended victim for extortion. In local judicial practice, experienced magistrates could exercise discretionary authority and reject certain tulai-oriented complaints. Nevertheless, the rule for homicides reporting compelled magistrates to accept any complaint connected with a corpse. Perpetrators therefore deployed corpses as an unavoidable hook to draw official attention and drag state power into private bargaining. This explains why the exploitation of corpses and deaths distinguishes tulai from ordinary false accusation.

Flaws in Qing judicial practice further abetted tulai, particularly in the sphere of autopsy work. Statutory rules stipulated that wound examination was the highest priority in inquests. Yet in practice, constrained by local fiscal pressures and tight case deadlines, most inquests failed to comply with statutory requirements. Owing to heavy caseloads, magistrates often absented themselves from overseeing coroners' work. Without proper superior oversight, coroner examinations frequently became superficial formalities. In the Xu Feilong case (Daoguang 1, 1821), coroner Hong Chun deleted and altered descriptions of the corpse's wounds to align with the

DOI: 10.54254/2753-7064/2026.39117

statement drafted by scribe Zheng Guangxu, hoping to speed up case resolution. The modified inquest report misled the magistrate's assessment of the case's nature and triggered repeated disputes during subsequent reviews, implicating numerous officials and innocent commoners.

Even when magistrates were physically present at inquests, compliance with formal procedures was not guaranteed. Sometimes magistrates actively intervened and instructed coroners to record findings in line with their own preliminary judgments. In the Luo Youliang case, Prefect Guo Qingfang, convinced the case belonged to murder, ordered the coroner to omit rib-cage injuries on corpse. Following investigation find the injuries that represented decisive physical evidence showing that Luo Youliang himself had fatally struck his mother.

Overall, statutory revisions broadened the applicability of the tulai offence, leading more incidents to be recorded in central state archives. Meanwhile, the tiered review system for homicides furnished the essential leverage for tulai plots to unfold, and procedural loopholes in autopsy inquests further facilitated social tulai practices.

3.2. Intervention by social-intermediary groups

The increase of tulai in Qing society cannot be separated from the agency of social intermediaries, among whom litigation masters (*Songshi*) and village headmen (*Xiangyue*) stand out.

Litigation masters furnished assistance for tulai plots both in terms of legal knowledge and practical procedural manoeuvres. Regarding legal knowledge, inclusion of tulai-related templates in secret litigation masterss' handbooks demonstrates that this group knew how to deploy the tulai offence in lawsuits. The section Homicide Cases in the 1845 handbook Xiao Cao yibi contains paired complaint and counter-complaint templates for homicide-related suits. One template bears the title "Complaint: Younger brother suffered an unjust death"; the other reads "Petition to refute a tulai false accusation".

Analysis of these templates reveals at least two layers of logic. When assisting tulai perpetrators, litigation masterss framed narratives featuring beatings and fatal injuries, emphasising tropes such as debt driven assault, death from severe wounds, and powerful bullies buying private settlements, so as to cast the frame-up perpetrator as a vulnerable party and reinforce the homicide character of the incident. When defending targets of tulai, litigation masters directly invoked the tulai offence in counter charges, stressing fabricated wounds and perjured testimony as markers of false accusation. Naturally, social situations could be far more complex. One cannot rule out the possibility that profit-driven litigation masters also helped powerful households disguise intentional homicides as the victim of tulai.

In procedural terms, litigation masters assisted tulai perpetrators in navigating legal formalities and even advise them on how to execute tulai plots. In a case from Ba xian (Jiaqing 26, 1821), Sichuan. Yi Guodong, with the instigation of inn-keeper Wang, accused Zhang Shixi of "intentionally wounding his younger brother" to perpetrate tulai. Beyond drafting the accusation, Wang contacted yamen runners and others to delay arrest warrants, so that Zhang could be detained in an inn for extortion, successfully realising the goal of tulai [6].

Another case illustrated that sometimes individuals had no initial tulai intention but were persuaded to pursue such plots while seeking resolution for their troubles. In Daoguang 21 (1841), Liu Xicai, an indebted peasant from southern Sichuan, sought help from He Hexiang, a local master skilled in yin-yang divination and complaint writing (Maybe he was the diviner of the local government) [7]. He advised him to self-inflict injuries to stir up trouble and drafted complaints for him to file against creditor for tulai.

DOI: 10.54254/2753-7064/2026.39117

The last case happened in Daoguang 23 (1843), Wang Yuancai clashed with Li Hanyue over a land-title deed. After losing an earlier lawsuit over the deed itself, Wang Yuancai turned to kinsman and litigation master Wang Cui (referred to in documents as "crafty knave"). Acting on Wang Cui's advice, he exploited an unidentified corpse and falsely charged Li with violent homicide to perpetrate tulai [8].

Across these disparate cases, litigation masters participated in tulai schemes by furnishing tactical advice, drafting pleadings, and contacting yamen runners to extract personal gain. Examining the social identities of Wang Kezhang, He Hexiang and Wang Cui further shows that they held other primary social roles: The first one ran an inn; Next worked as a feng-shui diviner; And last one was likely a degree-holding clansman. None made their living exclusively as professional litigation masters. This observation aligns with Melissa Macauley's research on litigation-master social profiles. Moreover, Wang Cui was the one who shared clan ties with the tulai perpetrator; but the other two had little prior economic connection with their clients before conspiring together. It follows that access to legal expertise was relatively attainable in mid-Qing society [9]. In Sichuan at least, one could seek legal advice from inn-keepers in urban hostels, feng-shui specialists with legal knowledge, or examination trained local literati.

Village headmen drew upon local social networks and information to create opportunities for tulai plots. Memorials dating to Qianlong 41 (1776) record that it was common practice for village headmen to "collude with local residents, collect money and manage lawsuits together", indicating that their social circles already included local legal specialists such as litigation masters.

Beyond that, possession of local intelligence also put village headmen in an advantageous position to seize the critical resource for tulai: corpses. In Baiyan town (Qianlong 53, 1788), itinerant vendor Liu Dingao drowned himself in a river out of poverty. His elder brother Liu Dingkui hired divers to retrieve the body. News quickly reached village headmen Cao Lun and Lian Dongsheng. After divers fished out a corpse, the two headmen falsely accused Liu Dingkui of intentionally killing his younger brother and successfully extorted money. Not satisfied with one extortion attempt, several days later they revisited Liu's home for a second round of extortion, demanding more than one hundred and sixty taels. Though not stated in his complaint, Liu had initially chosen private monetary settlement instead of official reporting. This may be explained by the ambiguity surrounding an unidentified fished-up corpse, together with the social clout held by Cao and Lian as village headmen. This case illustrates how village headmen combined information access and local power to dominate two key links of tulai: control over corpses and interpretive framing of causes of death, thereby raising the probability that their frame-up plots would succeed.

In summary, intermediary groups represented by litigation masters and village headmen furnished legal-level assistance as well as practical planning and execution, advancing the course of tulai plots. In other words, the repeated reproduction and spread of tulai in this era cannot be reduced solely to profit-seeking motives. It also depended upon intermediate social conditions in local society that made such plots feasible, actionable, and promotable.

3.3. Central-state attention toward tulai cases

The central state, headed by the Emperor and the Board of Punishments, paid considerable attention to tulai cases, focusing above all on whether homicide-related tulai incidents underwent statutorily prescribed tiered review and received correct adjudication. Political concern ultimately stemmed from oversight of judicial procedure.

Tulai cases frequently featured contradictions among corpse-wound evidence, material proof, and witness statements, alongside mourning-apparel ethical stakes. They easily generated disagreements

DOI: 10.54254/2753-7064/2026.39117

among officials during review, as well as bureaucratic collusion, narrative embellishment, and evasion of responsibility. This bore consequences for both procedural justice and what scholars term "judicial truth" in Qing criminal records [10]. When confronted with complex and ambiguous cases, bureaucratic actors prioritised producing internally-consistent, formally-compliant documentary records for the multi-level review chain, while factual truth and appropriate sentencing became secondary considerations. This incentivized officials to collude and revise narratives, distorting judicial proceedings.

The Luo Youliang case affords a window into review processes and potential narrative embellishment, summarised in Table 4.

Table 4. Multi-level review process in the Luo Youliang case

Hearing official	Administrative post	Hearing outcome	Judicial procedure
Guo Qingfang	Zhizhou	Zhang Zibu committed intentional homicide	Prefectural-level first-instance hearing
Xu Darong	Zhifu	Luo Youliang perpetrated tulai frameup	Case remanded to prefectural review
Tang Ruoying, Gao Gongxi	Zhifu	Found Luo Youliang guilty of tulai; later reverted to verdict that Zhang Zibu committed intentional homicide	Remanded for investigation by judicial-commissioner office
Qi Ming, Gui Chaoxu	Daoyuan	Zhang Zibu committed intentional homicide	Remanded for investigation by judicial-commissioner office
Gan Dingjin	Judicial commissioner	Zhang Zibu committed intentional homicide	Judicial-commissioner-level review
Chang Lin	Governor	Zhang Zibu committed intentional homicide	Provincial-governor-level review
Hu Jitang, Ji Qing	Board of Punishments minister, Manchu noble	Luo Youliang perpetrated tulai frame-up	Central-level re-examination

During the review of the case, officials fashioned a shared narrative under the explicit direction or implicit influence of Chang Lin. Disregarding the logical alignment between witness depositions and physical evidence, they endeavored to construct an alternative version of events that was formally coherent yet factually distorted.

Narrative embellishment during multi-level review exposes deep tensions between judicial adjudication and bureaucratic documentary-administrative imperatives. Judicial adjudication pursued substantive equity, while administrative evaluation prioritised formal procedural compliance; the two frequently collided. In this case, lawful adjudication demanded thorough weighing of corpse wounds, physical evidence, witness statements and reconciliation of contradictions. For bureaucratic actors, however, smooth review meant making contradictions "disappear" rather than resolving them. Officials therefore trimmed pluralistic factual accounts and collectively constructed a single logically coherent criminal narrative.

The disagreement between Xu Darong and Guo Qingfang originated in genuine judicial debate over facts. Once Gan Dingjin began repeated delegated inquiries, the case drifted from law-based adjudication into administrative terrain. Deviation intensified as hearings passed upward through successive bureaucratic tiers. Central state intervention, by contrast, served to disentangle

DOI: 10.54254/2753-7064/2026.39117

administrative interference from judicial proceedings. Starting from autopsy records Hu Jitang and Ji Qing attempted to bypass locally manufactured collective narratives and return to cross verification among corpse wound evidence, material proof and depositions to render accurate judgements. The existence of central review embodies the following logic: the Emperor holds ultimate ownership of all state power. His agents exercise delegated authority, yet imperial power seeks to ensure that delegated powers remain within bounds. In tulai adjudication, officials judging according to law represented delegated imperial power; colluding to embellish case narratives crossed permissible limits. From the Emperor's perspective, local judicial hearings ought to proceed independently of bureaucratic-administrative considerations. Consequently, central-state intervention in local trials does not necessarily amplify procedural distortion. It could equally represent imperial efforts to guarantee proper functioning of grassroots judicial procedure in defence of sovereign authority.

3.4. Combined interacting effects

The three sets of factors did not operate in isolation; they intertwined and jointly shaped tulai episodes. Again using the Luo Youliang case for illustration: the multilevel review system plus inquest-practice loopholes enabled Luo's plot. Throughout litigation, village headman Wang Pu lent assistance, furnishing tactical advice for tulai and mobilising social networks to manipulate judicial hearings and reduce risks. During multilevel provincial review, Shandong province officials constructed a unified narrative under Governor Chang Lin's influence. Xu Darong's dissenting opinion furnished the point for central-state intervention. Given that tulai could gravely impinge upon mourning-apparel system based local status-order, the Emperor and Board of Punishments officials reconstructed the case narrative centred on judicial procedure and judicial truth.

Overall, mid-Qing status-order systems founded on mourning-apparel system ethics attached great weight to homicide, especially homicides among kin. The multilevel homicide-review system, designed to emphasize the value of cherishing human life, incentivized more social actors to exploit corpses and deaths for tulai plots [11]. At the same time, social intermediary actors, well acquainted with local judicial realities, participated in tulai schemes, causing both tulai rhetoric and concrete tulai practices to proliferate.

4. Conclusion

Tulai in mid-Qing underwent statutory expansion and increasing mourning-grade-ethical orientation as a criminal offence. As a social practice, its core feature revolved around fabricating events and constructing interpretive accounts of death. These characteristics were embedded within mid-Qing-period social conditions. Across Qing China, institutions which were devised for governance purposes frequently deviated in real-world implementation. Social intermediary groups exploited spaces created by such institutional drift. This not only elevated state administrative costs but also widened the gap between formal state-institutional governance and locally-experiential governance. Research on tulai therefore furnishes a foundation for investigating shifts in state-governance logics across early-and-mid-Qing China and offers one additional interpretive angle for understanding state-local contestation in the later-Qing era.

Nevertheless, tulai in mid-qing encompasses far more than the above-mentioned dimensions. As stressed earlier, corpses and death always stood at the heart of tulai practice. This article adopts primarily an institutional perspective to explore how and why perpetrators could exploit corpses and death. It should be noted that state preoccupation with homicide was not an entirely state-invented

DOI: 10.54254/2753-7064/2026.39117

construct; rather, the state respected and instrumentally deployed pre-existing popular conceptions of death.

From this perspective, future research may adopt the lens of Qing social attitudes toward corpses and regionally-specific cultural conceptions of death. It can analyse the concrete influence exerted by corpses on the perpetration of tulai, as well as how tulai practices exploited or reshaped popular notions of death. Methodologically, quantitative statistical analysis also represents a promising research avenue. By compiling and comparing case counts of tulai across dimensions such as geographic regions and time periods, scholars can identify concrete trends in the scale and regional distribution of tulai in the Qing dynasty, laying a foundation for further investigations.

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