


RESEARCH ARTICLE

The Sale of Offices, Corruption, and Formalization: A Comparative Study of China and France in the Seventeenth and Eighteenth Centuries

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Abstract

This paper provides a detailed exploration of the sale of offices in China and France in the seventeenth and eighteenth centuries. In France, the sale of offices became deeply integrated into the officialdom, effectively serving as a formal institution. It was a part of the financial framework and contributed to the operation of the bureaucracy. However, this practice led to public dissatisfaction due to concerns about the fairness of the judicial system. Conversely, in China, the sale of offices was less formalized and more directly associated with corruption due to the close connection with informal income and the challenge to the formal system of imperial civil examinations. It was considered an ad hoc, informal, and pragmatic solution to financial emergencies. The sale of offices, in a different context, was seen as having both positive and negative aspects, with its impact varying, depending on the specific function it served.

Keywords: sale of offices; corruption; formalization; China; France

1. Overview

While the sale of offices has long been seen as a breeding ground for corruption, this view may be unjust. This paper aims to reconstruct the connection between the sale of offices and corruption in China and France under the reign of centralized monarchies. The sale of offices, often referred to as *juanna* (捐纳) or *juanguan* (捐官) in China and *la vénalité* or venality in France, facilitated proper governmental functioning and provided certain support for the fiscal systems but bared a name of corruption in public discourse. Offices for sale, or venal offices in this paper, includes official positions, ranks, titles, qualifications for offices, chances for promotion or exemption, etc. This paper only focuses on the sale of offices within the public sphere and those official positions related to public service. Private sales of offices and private employees were not on the horizon of this research unless specified.

The sale of offices is not an invention of the seventeenth and eighteenth centuries. It has a long history in China and France. In both countries, it became a hidden but essential part of daily governance, providing stable work resources to bureaucratic organizations and essential support to fiscal systems. Given that, royal rulers in China and France made varying efforts to formalize the sale of offices.

Still, a stereotype of firm connection between the sale of offices and corruption was built and widely accepted in both countries. Comparatively, the sale of offices was more common, institutionalized, and widely acknowledged in France, which is sometimes

viewed as an indispensable move in French history toward a rational bureaucracy and modernization (Mousnier, 1971, pp. 18–20). Tocqueville stated that

although the transformation of public functions into venal offices often proved beneficial concerning the courts, because the primary requisite of a good judicial system is that judges must be completely independent, it invariably did serious harm when it came to the administration proper, where the paramount requirements are responsibility, hierarchy, and zeal. (Tocqueville, 2011, pp. 47–8)

Despite the many critics, a positive view toward the sale of offices in public discourse often prevailed. The sale of offices eased the country's financial burden from continuous wars. Robert Descimon argues that the sale of official positions under the French monarchy was a form of public borrowing, not corruption (Descimon, 2006, pp. 177–242). William Doyle further explains that the sale of offices conformed to established procedures and was recognized by law. It was essentially a well-functioning system that met the needs of the royal government in the sixteenth and seventeenth centuries (Doyle, 1996, pp. 239–47). Moreover, it facilitated the upward mobility of the lower classes and the renewal of the leading classes. The bourgeoisie was thus able to participate in politics, exercise public power, and actively support the absolute monarchy (Pagès, 1932, pp. 477–95). The purchased offices enabled the donor to enjoy dignity and honour, like the old aristocracy (Nagle, 2008, pp. 85–6).

In China, however, the sale of offices is generally taken as a part of corrupt issues, which is harmful to imperial politics and finally contributes to the fall of dynasty. The sale of offices in Qing China faced more serious criticism. In the official historical record *Qing Shi Gao* (1976, repr.), *juanna* was described as a stopgap measure that led to possible political corruption. Deng Zhicheng, a famous Chinese historian, criticized *juanna*, the sale of offices, as the worst part of imperial politics in China (Deng, 1983, p. 88). A threat to the formal official selecting system, the imperial examination (*kuju*, 科举) from the sale of offices led to a certain level of stigmatization. *Juanna* was one of the ways to obtain an official position in the Qing. According to T'ung-chu Ch'u's study, gaining the official post of magistrate through informal ways, such as by purchasing an academic title and subsequent official title, accounted for an increasing share of all official posts from 1745 to 1850 (Ch'u, 1962, pp. 19–20). Although, according to some scholarship, the sale of offices was considered to enhance social mobility and ease financial crises and, as such, it was, for the most part, an indispensable informal institution, its corruptive reputation never ceases to exist (Wu, 2013, pp. 1–5).

Despite slight differences in public discourse, similarities in the institutional arrangements and functions allow a further comparative study between venal offices in China and France during the seventeenth and eighteenth centuries. The sale of offices in the two countries developed under similar centralized power structures, shared similar corruptive reputations, but evolved along different paths. During the seventeenth and eighteenth centuries, China and France both had very powerful monarchies and highly centralized bureaucracies. The Qing created the most highly centralized monarchy and hierarchical bureaucratic organization in imperial China (Wang, 2014, pp. 16–7), while French kings in the old regime were said to have enjoyed absolute power and ruled with the assistance of an established bureaucracy and standing army (Mann, 2012, p. 600). In addition, a similar principal-agent problem existed in China and France. The monarchs in China and France enjoyed supremacy but relied on the bureaucratic organization to maintain authority over a wide territory. Another reason for comparison is the coincidental existence of these two systems in the era in which both were in existence on the eve of a revolution. We can see from the sale of offices how subtle institutional differences can develop into a bifurcation point in history.

How can we best describe the sale of offices in the two countries of China and France during the seventeenth and eighteenth centuries? I argue that, despite many surface parallels in the sale of offices of the two countries, different levels of formalization differentiate the function of the sale of offices under certain political and social contexts. The corruptive reputation of the sale of offices in both countries originates from different roots. The venality in France had a stronger connection to the formal system and featured higher levels of formalization. It was a consistent and stable system, profoundly ingrained into the other systems of selection, appointment, and advancement in officialdom at the time and echoed in the tax and civil law systems. The sale of offices formed a virtuous circle with other institutions and reshaped the bureaucracy. In contrast, despite its long history in imperial China, the sale of offices is treated as an informal system or an expedient stopgap measure. It was largely restricted and remained in an awkward situation due to its threat to formal systems such as the imperial exam system. Similar institutions under comparable power structures could follow completely different directions, depending on subtle differences in power relations.

For a better understanding of the institutions and power struggles, the first two sections of this paper review the origins and development of sales of offices in China and France. The third section examines different aspects of the sale of offices in the two countries, including any overlap. The last section traces the logic of the two patterns, then analyzes the connection between the sale of offices and the stigmas related to corruption, and its influence on officialdom and imperial politics. The institutional foundation and political context that connect the two countries are then summarized.

2. The origins of the sale of offices in Qing China

The sale of offices has a long history in China, dating back to the Qin Dynasty (221–06 BCE) (Xu, 1950, p. 1): “the history of the sale of titles is longer than China’s history as a unified country” (Wu, 2013, p. 4). Generally, the sale of offices in imperial China underwent three major phases: the formative phase before the Qin Dynasty, the development phase from the Han Dynasty (206 BCE to 220 CE) to the Yuan Dynasty (1271–1368), and the institutional phase in the Ming (1368–1644) and Qing Dynasties (1644–1912).

The sale of offices made its first appearance in the literature of the Spring and Autumn Period (approximately 770–476 BCE) and Warring States Period (476–221 BCE). During this period, the government began the sales of noble titles and privileges, rather than official positions with substantive power. According to *Han Fei* 韩非, wealthy people were eager to purchase ranks and office, and those who had connections sought success (故财利多者买官以为贵, 有左右之交者请谒以成重).¹ *Guan Zi* 管子 listed the sale of offices as one of the reasons for the fall of imperial states (上卖官爵, 十年而亡).²

In the following imperial dynasties, including the Han Dynasty, Tang Dynasty (618–907), Song Dynasty (960–1279), and Yuan Dynasty (1271–1368), the sale of offices started an era of development. It generally became an ad hoc formula for emergencies and usually opened for a short period of time to meet sudden financial needs (Xu, 1950, pp. 1–2). During the early Han Dynasty, the sale of offices evolved into a more extensive and organized practice (Wu, 2013, p. 5). For instance, Emperor Wu of the Han Dynasty (汉武帝, reigned 14–87 BC) introduced a system called *Wu Gong Jue* (武功爵), allowing donations for official titles and exemptions from certain crimes. This move soon proved to be a good

¹ Han Fei (韩非, 280–33 BCE) was the greatest of China’s Legalist philosophers. Han Fei’s philosophy was primarily a political strategy that centred on the authority of the leader, who was to maintain firm control over officials and the people. See *Han Feizi* (2010, repr.). Beijing: Zhonghua Shuju.

² *Guanzi* (2019, repr.) was the work of Guan Zhong (管仲), who was a statesman and adviser of Duke Huan of Qi and regarded by some modern scholars as the first Legalist.

strategy for financial crises. In one year, the Han administration gained more than 300,000 gold (*sanwanjin*, 三万金).³

As time progressed, the sale of offices was adopted on a much larger scale. In the Bei Wei Dynasty (385–535) during the North and South Division period, the sale of offices expanded to cover a wider range of tradable items, including titles, qualifications for office, and official positions, driven by the ongoing wars and the pressing need for additional military funding. Nonetheless, there were limits to this expansion, as ancient Chinese imperial rulers consistently made efforts to curtail or even eliminate the practice of selling official positions once the crisis situation improved. A similar pattern was observed in the Sui Dynasty (603–18) and the early Tang Dynasty, when the sale of offices was temporarily suspended but then reinstated due to financial crises resulting from warfare (Wang, 2013, p. 102). The sale of offices became more standardized and systematized during the later Song and Yuan Dynasties. The scope and prices of official positions were codified and documented in various legal records. During this period, imperial rulers established two crucial principles regarding the sale of offices: the Song emperors primarily sold sinecures and nominal official titles, while the Yuan emperors limited the sale to low-level active official posts (Wu, 2013, pp. 4–10).

The sale of offices in the Ming and Qing Dynasties represented an institutional phase marked by established institutions. Like previous emperors in previous dynasties, Ming emperors were reluctant to adopt venal offices policies and allowed the sale of offices only after the fiscal crises brought about by wars and calamities, until August 1449, when Ming Emperor Zhu Qizhen was captured by the Mongol Oirat ruler, Esen Taishi, and imprisoned at Tumu Fortress.⁴ In response to war finance and reparations, the Ming government had to announce the reopening of *juanna* to raise emergency funds. This venal office policy was expanded several times later on in the Ming Dynasty, while its implementation continued as the general trend shifted from local administrations to the whole territory and from temporary expedient laws to established systems (Wu, 2013, p. 37).

The beginning of the sale of offices under the Qing was also about war finance. Emperor Shunzhi (1644–61) allowed donations in exchange for *Guozijian* students and granting office qualifications under the name “*Na li ru jian*” (纳粟入监). Emperor Kangxi (1662–1722) attempted to broaden the application and advanced the standardization of procedures (Wu, 2021, pp. 64–9, 69–72). Due to the shortfall in military expenses during the “Three Clans” Rebellion (三藩之乱), it was reopened. Emperor Kangxi allowed even more lower-level civil official positions to be purchased. To prevent its abuse, he stipulated that the offices obtained from the sale of offices could be promoted and transferred only if the donors were evaluated as competent after three years in office; otherwise, they would be removed.⁵

The Qianlong emperor (1736–95) largely formalized the sale of offices. He adjusted such policies, while expressing fierce criticism towards the sale of offices. Under his reign, the sale of official posts with substantive power was strictly limited and gradually abandoned. The main official posts for sale during the Qianlong period reverted to qualifications of *Guozijian* students and qualifications for office. The sale of offices then was divided into two systems: donations following either the Routine Regulation (*Xianxing Shili*, 现行事例) or the Contemporary Regulation (*Zanxing Shili*, 暂行事例) (Xu, 1950, pp. 77–96; Liu, 2010,

³ According to *Shiji* 史记, volume 30, *Ping Huai Shu di ba* 平淮书第八, the *Wu Gong Jue* system established a 17-level ranking system and gained more than 300,000 gold.

⁴ More details about this battle can be found in *Mingyingzong Shilu* 明英宗实录, Vol. 187 (1962, repr.). This event was called the Tumu Crisis 土木之变 and was generally considered a turning point of the Ming Dynasty. The stronger Ming army was defeated, while more social crises were yet to come.

⁵ *Qingshengzu Renhuangdi Shilu*, Vol. 8, p. 140. More details can be found in *Qingshengzu Renhuangdi Shilu* 清圣祖仁皇帝实录, Vol. 8, p. 140, and Vol. 11, p. 172.

pp. 115–23). The former, which were permanently opened, included donations for nominal official titles without substantive power, exemptions from administrative sanctions, and qualifications for office. The latter allowed donations for active official positions with substantive power, awards, and exemptions, and were only opened for special events such as financing military expenses, famines, and floods (Wu, 2013, pp. 79–81). Under the reigns of the Jiaqing and Daoguang emperors (1820–45), social crises grew much more frequent and the government's thirst for large sums of money became more pronounced; thus, the sale of offices was further expanded and institutionalized. Many evaluated that the expansion of venal offices was a significant drawback that invited political corruption in the Qing Dynasty.

It is worth noting that, beginning in the Song Dynasty, the development of the imperial examination system, also known as *kuju* (科举), made the emperors more inclined to select qualified officials through the formal examinations. As a result, the sale of official positions saw the implementation of stricter regulations and increased constraints. The relationship between the sale of offices and the imperial examination systems in imperial China was intricate (Wu, 2021, pp. 47–62, 103). In imperial China, there were two main ways to obtain a formal appointment to an official position: imperial examinations or the sale of offices. The imperial examination system was established around the seventh century and became the predominant method for attaining office. It emerged as the most significant means of recruiting government officials and enhancing social mobility within imperial China. These examinations predominantly assessed knowledge of Chinese classics and the writing style known as the eight-legged essay (*baguwen*, 八股文).

Under the Qing, it developed into a roughly five-tiered ladder from local to provincial to court exams and took years to pass before the appointment of an official position. Earning the prestigious title of *jinshi* (进士) through the court exam was considered an auspicious start to one's career. This system was portrayed as a just and competitive route to attain office and privileges, bestowing legitimacy upon imperial governance (Elman, 2013, pp. 1–5). Compared with the imperial examination, the sale of offices was presented as an improper and unfair way to offices, as it was taken as a privilege of the rich and detrimental to social justice (Wu, 2013, pp. 28–9). Although the sale of offices was stigmatized and largely limited in most dynasties, emperors in imperial China seldom totally abandoned it. It exerted influence by securing an adequate workforce for official organizations, fulfilling specific policy purposes, and providing additional funds for the state treasury. The emphasis on imperial examination, the formal system of recruiting officials, and limitation on the sale of offices in imperial China suggest a state-dominated system of officialdom. Officers were selected formally and fairly using the state-held exams and served as state civil officers in the central state or state representatives in local administrations (Wu, 2013, pp. 67–9).

The sale of offices under the Qing indicated the most systematic and elaborate implementation of this system in imperial China. A glance at its history reveals the following. First and foremost, the sale of offices was primarily a response to fiscal pressures. It was regarded as one of the most effective methods for augmenting government revenue, particularly in addressing pressing financial demands beyond routine fiscal measures. Second, this practice allowed individuals to acquire mainly nominal official titles lacking substantial authority and various qualifications for official positions. While the Yuan and Qing Dynasties did permit the purchase of specific low-level official positions with substantive authority, this was an occasional ad hoc measure rather than a regular occurrence. Furthermore, the level of institutionalization of venal offices showed gradual improvement. Prior to the Ming and Qing Dynasties, the sale of offices was a short-term policy that was typically abolished once the financial crisis was resolved. However, starting from the middle of the Ming Dynasty, the sale of offices began to follow a trend of becoming more structured and standardized. Over time, a multitude of laws,

detailed regulations, and refined distinctions related to the sale of offices emerged, gradually achieving a certain extent of formalization and systematization.

3. The sale of offices in the old regime in France

Until the early modern period, France did not have a comprehensive and hierarchical bureaucratic organization like that of imperial China. The development of French bureaucracy was closely intertwined with the sale of offices, expansion of royal domains, and rise of the monarchy.

The period from the end of the fifteenth century to the eve of the French Revolution in 1789 marked a significant shift in French society, moving from the medieval era to a pre-modern phase. During this period, various economic and social factors paved the way for the establishment of an absolute monarchy in France. Concurrently, the sale of offices persisted throughout the rise and eventual decline of the French monarchy. It is worth noting that the sale of public offices was common practice across European countries during this time. However, in contrast to the sporadic and occasional nature of this practice in most European nations, in pre-revolutionary France, venality was a well-established and formalized system. This system facilitated a direct connection between individuals and the absolute monarchy through the acquisition of official positions, which conferred a portion of the king's public authority (Bélyéd, 2010, p. 920).

In France, the sale of offices, known as *la vénalité des offices* or *la vénalité*, began in the thirteenth century. During the medieval period, as the royal domains expanded and the king was unable to control these officials effectively, he authorized the *baillis* to conduct routine supervision. These royally appointed *baillis* were paid by the king, and they gradually evolved into lifelong and fixed local official posts with settled supervisory jurisdictions. The appearance of such fixed positions enabled the exchange of money and power. Doyle indicates that French kings began to monetize power and sell offices as early as the thirteenth century. From the fourteenth century onward, such private transactions existed between individuals, including the nobles and rich commoners, and even among the king's ministers. Most of the private sales only applied to lower positions, mainly private and non-profitable transactions. When venality spread to some important judicial positions, it was publicly condemned because the sale of these posts was expressly forbidden in the *états généraux* held in 1356 and 1484 (Doyle, 1996, p. 5).

A decree in 1467 further confirmed that the offices could be sold and purchased. Louis XI stated that the king could not abolish an office at will, except in cases of death, betrayal of the king, or voluntary resignation. Following the doctrine of *resignatio in favorem* in Canon Law, the holder of an office for life could pass it on to a relative or a buyer (Doyle, 1996, p. 4). The public widely criticized this system for the increasing risk of corruption, forcing the monarchy to respond. Consequently, in 1493, Charles VIII made it mandatory for all judges to take the oath of office by declaring that their office was not bought (Mousnier, 1974, p. 39). In other words, offices for sale took on certain attributes of public commodity.

However, public criticism and concerns were always incompatible with political and economic interests. Along with the Crown's desire to strengthen his centralized authority, venality was allowed and promoted between the fourteenth and sixteenth centuries. Not only low-level clerkships and notaries, but even certain finance positions were sold by the French kings (Bélyéd, 2010, p. 920). A significant turning point in the development of the venality appeared in the first half of the sixteenth century, parallel to the initial development of the absolute monarchy: the growth of official positions for sale witnessed a sharp increase and shaped a whole new class of office-holders (Le Roy Ladurie, 1994, p. 274).

In 1523, François I (1515–47) created a far-reaching institution, the *bureau des parties casuelles*, which was responsible for collecting and managing money from the sale of offices. This move indicated a milestone in that the sale of offices became an open state policy. The population of venal office-holders experienced a sharp rise. In 1515, the number of office-holders was 4,041; in 1610, it was about 25,000; and by 1665, it had grown to 46,047 (Stocker, 1978, pp. 4–29). The French kings, in response to the growth, sought to increase the number of offices available for sale to raise the revenue. Between 1515 and 1665, the number of official posts available increased eleven-fold. In 1552, Henry II transformed the judicial district courts into courts of first instance, creating 540 new and useless offices. He also divided an official post into quarterly appointments, namely *offices alternatifs*, to increase the revenue from venal offices (Sueur, 1989, pp. 279–81).

Further, following fundraising concerns, the transfer of positions between private individuals was regulated. Henry IV's administration regulated the sale of offices through establishing an annual tax in 1604, the *paulette*. Previously, subject to Canon Law, private transactions that took place within 40 days before the death of the transferor were invalid, and the office would be revoked by the king. Such rules increased the risk level for buyers and were not conducive to the further expansion of the sale of offices. Since these private transactions were common, Paulet, a tax collector, suggested that the 40-day clause be waived and that a transfer tax of the value of the purchased official post could be collected annually. His proposal was soon approved and adopted by the royal administration. The official tax was paid voluntarily by the office-holders at the beginning of each year, and the price was one-sixtieth of the value of the official position; when the office-holders resigned, they had to pay a transfer fee equal to one-eighth of the price of the official position to the state treasury. With the establishment of the official tax, the 40-day limit was removed, the official position became truly heritable, and privatization of official posts had reached another milestone (Mousnier, 1974, pp. 242–8).

In a sense, the sales of offices in France were treated similarly to real-estate transactions related to land and home ownership. From a legal standpoint, every official post had a price and its market, but the transaction required imperial approval. This situation allowed the monarchy to maintain a certain level of control and supervision over the sale of offices and office-holders. For the donor, the hereditary and secure nature of the official position served not only to promote a family's standing, but also to assure the long-term stability and growth of the family's wealth. Thus, the sale of offices then grew into a complicit process favoured by both the imperial court and social elites. During Louis XIV's reign, when centralized power in France was at its height, the sale of public offices also reached its peak.

As in the Qing Dynasty, the history of venal offices in France developed alongside financial pressures brought by wars and natural disasters. However, unlike the Qing Dynasty, the French monarchs formalized and institutionalized the venality of offices to a greater extent. The French monarchs established specific organizations and adopted tax policies, making the sale of offices part of the formal system. Moreover, the growing number of tradable offices coincided with the continuous expansion of state capacity in France. The sale of offices enabled French monarchs to develop professional bureaucratic organizations and allowed emerging elites to participate in political life. Consequently, the French monarchs gained a reliable source of income, reconciled with rising new social classes, and brought in changes to the existing system through the sale of offices.

4. Power, state finance, and informal income of venal offices

Originating from financial pressure, the sale of offices during the seventeenth and eighteenth centuries was significant for both China and France. Nevertheless, the

centralized monarchs of these countries harboured distinct apprehensions regarding the venal offices and exhibited varying degrees of formalization. It is crucial to acknowledge the critical factors that set apart venal offices in these two countries. The subsequent section delves into three crucial elements: the actual power wielded by office-holders, the financial implications for the state, and the income acquired informally.

4.1 The power and career of office-holders

One of the most significant differences between the two countries in the field of venal offices is whether venal office-holders could have substantive power. In France, there was a broad spectrum of venal offices and donors were conferred with substantial authority. Conversely, during the Qing Dynasty, Manchu rulers primarily sold nominal official titles that were devoid of real power and made deliberate efforts to curtail the influence of venality.

In France, the sale of offices provided a straightforward social ladder for merchants and commoners of non-aristocratic origin to participate in politics and improve their social status. Most venal official positions in France were judicial positions. Donors needed to meet additional requirements, such as having full training and a diploma from law schools, before purchasing venal offices. Usually, they would purchase relatively inexpensive positions as *conseillers* and gain court experience (Armstrong, 1972, p. 12). According to the decree of 1598, six years in the *parlement* or 12 years as members of the bar were sufficient to apply for the designation of *maître des request*. The *maître des request* enjoyed broad powers and undertook trial and inspection work (Bonney, 1988, pp. 79–100). This official position was a basis for further promotions to high offices, such as *intendant* and *conseiller d'état*. It is worth noting that these high-level and powerful positions were not tradable or transferable (Sueur, 1989, p. 285).

The sale of offices then became an essential means for rich merchants and commoners to ascend the social hierarchy. An official position was not only an investment, but, more importantly, it allowed the office-holder to step in the officialdom and to enjoy the prestige, privileges, and even aristocratic status that accompanied such roles. According to Mousnier, the bourgeoisie envied the nobility and imitated their way of life, and their greatest social ambition was to attain aristocratic status (Mousnier, 1974, pp. 42–5). This channel onto the social ladder produced a new social class in the history of France: the *noblesse de robe*, who primarily served in the judiciary. Due to the hereditary nature of the official position and the confirmation requirements from the king, the *noblesse de robe* required royal affirmation and offered administrative and judicial services in response.

In parallel with the monarchy's strengthening, the maintenance of a sizeable standing army, and nationwide tax collection, there emerged a substantial need for both financial and human resources. The sale of offices effectively addressed the expanding financial requirements of the monarchy while concurrently supplying a substantial pool of well-educated administrative officials. Diverging from the traditional nobility, the *noblesse de robe* developed into steadfast supporters of the monarchy. Nonetheless, towards the beginning of Louis XIV's reign, France transitioned from a "judicial state" to an "administrative state" or "fiscal state," and the office-holders who arose from the sale of offices worked to strengthen absolutism.

In comparison, the sale of offices had a limited function during the Qing Dynasty in China. First, according to the Routine Regulation (现行事例), which was open all year round, the primary purpose was to provide qualifications and administrative rewards, but not to grant privileges to active official positions. In the case of the Contemporary Regulation (暂行事例), official positions granted to those who already qualified for offices were limited to three types: calamity relief, river work, and munitions (Wu, 2013, pp. 75–7). The venal offices from both Routine Regulation and Contemporary Regulation exerted

little impact on official recruitment or routines in China's bureaucratic organizations, as the Qing authorities clearly strove to limit the influence of *juanna* on the existing bureaucracy through the implementation of stringent policies.

The sale of offices shaped officialdom differently in China and France. In France, it brought about a profound overhaul of the official system and played a pivotal role in the emergence of a new class of donors and office-holders. Those who acquired venal official positions that were endowed with real authority became progressively engaged in political affairs. This not only reshaped the composition of the nobility and the structure of bureaucracy, but also aligned with the prevailing trend for reinforcing absolutist monarchy and consolidating central government institutions. Under the Qing, the sale of offices was subject to stringent constraints and did not pose any significant challenge to the established formal institutions.

4.2 Financial functions and state finance

The sale of offices had quite different financial functions in China and France. In the Qing, the sale of offices served as an ad hoc financial measure to meet emergent needs. However, it failed to provide stable and adequate financial support. Donations for venal offices not only occurred in monetary form, but also as goods, such as horses, copper, and grain (Xu, 1950, pp. 79–100). Income from the Routine Regulation was stable and relatively low since the prices for tradable official posts was reasonable and fixed. For example, the price for one student post in *Guozhijian* ranged from 60 to 108 silver taels (Wu, 2013, p. 77). The Ministry of Revenue regulated that both civil and military officials could donate for their family elders, decreasing from 800 to 100 silver taels according to their official ranks (Xu, 1950, pp. 85–8). In addition, the number of official positions available for sale was also fixed, given that the number of certificates authorized by the ministries was fixed (Wu, 2013, pp. 84–92). According to historian Xu Daling, a considerable part of the Qing Dynasty treasury revenue relied on donations every year. During the Qianlong period, the Routine Regulation brought in an annual income of 3 million silver taels (Xu, 1950, p. 110).

Donations from the Contemporary Regulation were designed to be much greater in value, especially under the reign of the Qianlong and Jiaqing emperors. Despite the label “Contemporary,” this system was a *de facto* regular system. Whenever an emergency arose, donations occasioned by the Contemporary Regulation were almost inevitable, often amounting to millions of taels (Wu, 2021, pp. 140–2, 202–7, 249–57). For instance, the *Gongzhen Shili* (工賑事例) between the sixth and seventh years under the Jiaqing emperor's reign collected 7.59 million silver taels (Xu, 1950, p. 110). Compared with the formal income of the government, field taxes (*tianfu*, 田賦) under the reign of the Qianlong and Jiaqing emperors amounted to around 30 billion taels, equal to 70% of state income (Shen, 2002, pp. 84–90). Thus, income from the sale of offices made up a very small part of state finances, and was classified as an informal institution and ad hoc measure. It was not until the last ten years before the fall of the Qing Dynasty that the government made this a part of the state's regular income (Xu, 1950, pp. 70–3).

In France, the sale of offices provided a more substantial income to the administration. During the 1730s, the sale of offices never generated less than one-quarter of the annual revenue of the Crown; in some years, it was as much as 40%. In 1689, the total revenue from the sale of offices was around 420 million *livres*. In 1722, the total value of the offices was four times the annual income of the Crown (Doyle, 1996, pp. 9–55). Before the French Revolution, the sale of official posts slowed, but the effects remained far-reaching. In September 1794, the total number of tradable offices at that time was 64,960, with a total value of 798,813,120 *livres*. The total number of posts available in the final decades of the *Ancien Régime* was actually around 70,000, with a total value of over 800 million *livres*.

In 1788, however, the total revenue of the French government did not exceed 500 million *livres* (Doyle, 1996, pp. 60–2).

In comparison, the financial significance of the sale of offices in France was far greater than that in the Qing Dynasty, as were its stability and sustainability of contribution to the fiscal system. Between the seventeenth and eighteenth centuries, the income from the sale of official posts already formed a formal part of the state revenue in France. Conversely, in Qing China, the sale of offices made a relatively minor contribution to the state's financial resources and was rarely openly acknowledged by official institutions.

4.3 Formal and informal income

Donors were rewarded differently through the sale of offices in China and France between the seventeenth and eighteenth centuries, though the income gained through the sale of official positions in both countries was quite modest. In France, the sale of offices was a profitable investment based on institutional arrangements that facilitated transfers and succession. In China, informal income made it profitable to engage in venality.

Similarly, central administrations in China and France could not provide decent salaries for most office-holders. In France, the holder of an official post could receive modest *gages* for his status, usually less than 1% of the purchase price. This inadequate funding applied to both administrative and personnel costs (Sueur, 1989, pp. 285, 304–6). Much of the attraction of the venal offices lay in aspects beyond official pay. Indeed, individuals purchased official positions only to enhance their status, rather than to increase their wealth. Two components were involved in the venal offices: the official title and the *finance*, its property attributes. Notably, the official title could only be acquired by *lettres de provision* from the king, while the property attributes of the official title were open to transfer and succession. In other words, the paid official position was a major asset. In around 1630, judicial offices often accounted for one-third of the wealth of the office-holder, and by the eighteenth century, despite the decline in the price of offices, they accounted for nearly one-quarter of the total value of assets. Furthermore, the prevalence of the sales of offices met the demand of asset holders to invest in official positions. The prices of official positions generally tended to rise in the seventeenth century and, by 1635, the average price of a tradable official position increased fivefold (Cabourdin and Viard, 1990, p. 244).

In the Qing Dynasty, the formal salary for office-holders was meagre. Formal income was fixed. For a first-rank officer, the salary was set at 180 taels of silver and 80 drachms of rice, while only 45 taels of silver and 45 drachms of rice were given to a seventh-rank position holder, such as a magistrate. However, a magistrate's salary of 45 taels could only cover living expenses for five or six days, leaving no money for the remaining 20 days of the month (Ch'u, 1962, pp. 20–5). The salaries of officers in the Qing Dynasty were a negligible portion of their family holdings, though Qing officials and gentlemen possessed a vastly more significant amount of property. In 1723, the Yongzheng emperor established the Yanglianyin system (养廉银), providing Yanglianyin officials with an additional income of ten to a 100 times the original salary for officers, to ease financial difficulties and to weaken motives for informal income and corruption (Liu, 2020, pp. 28–44). However, these adjustments were far from sufficient.

Informal income was an unavoidable aspect of a Qing official's career. One of the primary reasons for this was the vague boundary between personal income and the public budget: office-holders in the central government or local administration were expected to pay out of pocket to keep their office running (Zhang, 2013, pp. 39–79). This institutional arrangement brought great financial difficulties for officials and made informal income, namely *lougui* (陋规), inevitable. Scholars have put forward arguments regarding informal income for local administration. For instance, Guo Chengkang argues that informal income

for magistrates was a type of corruption, stating that, as the main source of informal income, “*lougui* became so widespread that they have become the greatest social nuisance and source of tax loss” (Guo, 1995, p. 14). In contrast, T’ung-tsu Ch’u insists that informal income was not corruption because “the collection of *lougui* was nothing more than a long-standing practice that was not only officially sanctioned but also widely accepted.” He maintains that there was no clear and visible line of demarcation between this informal income and corruption within this structure (Ch’u, 1962, pp. 195–6). Further, Madeleine Zelin indicates that magistrates under the Qing also had to pay a large portion of their own financial expenses for local infrastructure development. She calls this an “unofficial source of funding.” According to her estimates, informal income accounted for 40% to 50% of formal financial revenues (Zelin, 1992, pp. 1–20). Intertwined with public budget, the amount of informal income could be huge. There was a saying related to informal income in office: “three years as a clear magistrate, one can earn 100,000 taels” (三年清知府，十万雪花银).

For the office-holders in China and France during the seventeenth and eighteenth centuries, the boundary between public and private property was not clear. Their meagre salaries were clearly insufficient to meet their basic necessities, yet they were forced to rely on their offices and power to obtain benefits informally. In France, the shifting price of offices, privileges, the opportunity to ascend the social hierarchy, and informal income made venality a good deal. In China, informal income and privileges brought by offices were the main rewards from such sales. The significance of informal income varied for office-holders in the two countries. Officials in the Qing placed greater significance on informal income. Nevertheless, in both countries, the relationship between informal income and the formal fiscal system, coupled with insufficient financial support from the monarchy to the office-holders, created a space that was susceptible to corruption.

Initially stemming from the financial pressures of war, the development of the sale of offices in China and France followed two different trends. In France, official positions available for sale held substantive power and were viewed by merchants and commoners as a form of access to social class advancement. They not only benefited the state treasury, but also represented a meaningful investment for private individuals. As a result, the sale of offices grew more institutionalized and formalized in France in the seventeenth and eighteenth centuries. It built up links among the state treasury, taxation, and how officials were selected. In China during the same period, the sale of offices was strictly limited. It was only used as an ad hoc form of compensation for the existing financial system. The official positions available for sale were more qualification-related than official positions with substantive power. Highly regulated and institutionalized layers of barriers were built between the sale of offices and the formal system. The Qing emperors excluded the sale of offices from the formal structures of bureaucracy, such as the financial and imperial civil examination systems.

5. The sale of offices, formalization, and corruption

In the seventeenth and eighteenth centuries, the administrations of China and France had distinct approaches to the sale of public offices, characterized by significant regulatory efforts and intricate relationships with other formal systems. In Qing China, the royal rulers worked diligently to minimize the influence of venal offices, whereas French monarchs readily embraced venality and provided substantial institutional support. This paper refers to this divergence as a difference in the level of “formalization.” Although the sale of offices was seldom directly labelled as corruption in these two countries, it frequently faced criticism for either fostering or being associated with corruption. This section delves into the complex relationship and underlying rationale behind the level of formalization of venal offices and the perception of corruption.

5.1 The corruption stereotype and the sale of offices

Before we further discuss how the level of formalization differentiates the relationship between the sale of offices and corruption, it is important to begin with the distant dynamics in the relations of China and France. Since the sale of offices enabled a shortcut for the wealthy to gain privileges and to enter the civil service, it was seen as a significant drawback that invited political corruption in the Qing Dynasty and the old regime in France. As stated by the high-ranking officer, Shandong Governor Yan Jingming (阎敬铭) in the Qing:

The amount of money donated to a prefectural office was small, and the sons of families with property fought for it one after another in the hope that it would last for generations as a monopoly, while those who did not have money also took out loans to buy it, and it was very easy to repay. This made the lower-level officers unsatisfied with their rank and distracted the Confucian literati from their studies. Everyone shared a view of pursuing and acting in their own interests. How is it possible to expect them to discipline themselves in this way?⁶

Yan presented the nature of internal links between corruption and the sale of offices in this memorial to the Daoguang emperor (who reigned from 1820 to 1850). He proposed that the significance of venality lay in its input-output ratio. Informal income, often perceived as a form of corruption, played a crucial part in the sale of offices: since formal financial support and salaries were far from enough for officers to bear the costs of performing their official duties and funding their own lives, informal income became a necessity for most of them. In some extreme cases, donors could make a quick return on their money and even have a large profit from informal income. The sale of offices then became an investment and a privilege to abuse. Yan considered this to be a threat to disciplines within bureaucracy.

In imperial China, the informal income of offices was long regarded as a kind of “corruption.” From a legal perspective, Adam Liu argues that “corruption” refers to all irregularities that seek to increase one’s private gain. Bribery, extortion, misappropriation of public assets, favouritism, nepotism, and gangsterism are all seen as corrupt practices in imperial China (Lui, 1978, pp. 83–94). Similarly, Nancy Park investigates statutory definitions of corruption. Her summary states that this term applied to “virtually all reciprocal acts in which individuals with public functions involved are prohibited by law” (Park, 1997, p. 967). While most officials were aware of the impracticality of the statutory standard for corruption, there was considerable flexibility in how corruption was perceived and treated.

Censorial impeachments were the main channel used by Manchu royal rulers to catch and sanction corruption in officialdom. Officers responsible for accusations of misconduct, namely Censors (*yushi*, 御史), Governors (*xunfu*, 巡抚), and Governor-Generals (*zongdu*, 总督), were authorized to accuse any kinds of misconduct, including corrupt misdeeds, unethical conduct, and mistakes in official matters. The number of officers authorized with the power of accusation were limited and they could not afford to supervise over 20,000 officials of all ranks across the giant empire. With regard to the vast number of wrongdoings throughout officialdom, the number of censorial impeachments was very modest (Ma, 1974, p. 155).

Differently from the pattern of wide-range condemnation on corruption and modest sentencing in China, the French developed a system with more judicial participation. Usually, the condemnation on corruption related to the sale of offices in France was

⁶ Yan Jingming was the Shandong Governor 山东巡抚 at the time. His statement represents the mainstream opinion of the scholar-officials at the time.

corruption in judiciary. In 1614, the delegates at the Third Council submitted 310 petitions denouncing the shortcomings of the sale of offices, stating that those who entered the judicial system through the venality took advantage of the lack of transparency in the judicial proceedings, the complexity of the procedures, and the irregularity of the costs of litigation, deliberately prolonging cases, charging additional fees, and demanding bribes from both parties. These corrupt practices become a source of income for the judicial office-holders, as their own regular salaries paid through the French monarch were far from sufficient to cover their livelihood (Carey, 1981, p. 15). According to Jean Bodin (1530–96), who feared that the venality of offices deprived the monarchy of power and freedom to choose his officers, denounced the sale of judicial offices as the most dangerous and pernicious plague in a country. He considered that those who sold them “open[ed] the door to all kinds of evil, bringing corruption, greed, injustice, arrogance, and irreverence.” In general, the public were unsatisfied with injustice, rather than the sale of offices itself (Sawyer, 1988, p. 102).

Furthermore, the aim of anti-corruption establishments and regulations was to safeguard state finances and maintain local stability, rather than eradicating all forms of corruption within the bureaucracy. Ad hoc courts presided over by special commissioners such as intendants and special tribunals, such as the Chamber of Justice, were two central institutions for anti-corruption in the *Ancien Régime*. For anti-corruption practices implemented by *intendants des provinces*, the proceedings were primarily concerned with the loss of revenue, such as concealing the registration of deeds or the embezzlement of public money (Durand, 2017, p. 153). On the other hand, special tribunals held periodically were established by the French monarchy to charge for mismanaging financial resources as early as the early fourteenth century (Goldner, 2013, pp. 5–28). These anti-corruption establishments targeted behaviours seen as detrimental to the royal coffers.

The sale of offices in China and France, though both labelled as corruption, were confronted with vastly distinct circumstances. Though not considered corruption per se in both countries, it was widely condemned because individuals seeking official positions had to rely on informal income, and those bestowing the positions had a stronger incentive to secure higher informal income. The Qing administration in China imposed much stricter laws for corruption, even though their anti-corruption agencies claimed to combat all forms of corruption; in reality, they could only intermittently pose a threat, coexisting with most irregularities. In contrast, in France, venal office-holders over the same period enjoyed a more favourable public perception, were more formally acknowledged, and faced fewer anti-corruption allegations. Anti-corruption agencies in France followed a modest pattern during that period. From the perspective of corruption, due to the different recognition by formal institutions, the degrees of condemnation faced by the sale of offices in China and France were not the same.

5.2 Difference in formalization and bureaucracy

During the seventeenth and eighteenth centuries, the sale of offices in China and France was stigmatized as “corruption” and this characterization can be attributed to varying degrees of formalization. How did the stands and actions of administrations construct this label and attach it to venality? In light of discussions in previous sections, this section explores in depth the underlying rationale of venal offices to the distinct political systems of the two countries.

In France, the sale of offices operated on roughly the following process: venal offices were sold by the French kings and purchased by donors, who later became office-holders. During the seventeenth and eighteenth centuries, these office-holders primarily fulfilled roles related to public service, particularly in the realm of the judiciary. People who enjoyed public services needed to pay taxes and cover the costs of litigation (as well as

other informal fees). Descimon argues that the sale of offices in France was actually a form of public lending: each granted office represented a fractional share of public authority, for which the donor paid a specific monetary sum. This transaction was subject to taxation because the bestowed office was regarded as a form of property that could be pledged and transferred (Descimon, 2006, pp. 177–242). As a result, the French king received substantial monetary gains and the number of office-holders rose steeply. The donors and office-holders, who were mainly emerging bourgeoisie, also gained the opportunity to participate in politics and ascend the social ladder. Consequently, the sale of offices and other formal institutions created a virtuous loop.

Under the Qing, the sale of offices was entirely taken as an ad hoc fundraising measure. The sale of offices was subject to stringent restrictions, with limited institutional support. It faced widespread criticism within public discourse. However, its impact on the formal bureaucracy, the financial system, and the career trajectories of government personnel was minimal. This was the deliberate result of efforts by the Manchu royal rulers to diminish its influence on the formal imperial examination system, as it was viewed as a hindrance to the formal imperial examination system and was opposed by all those who attained their official positions through the imperial examination. Furthermore, a constant influx of individuals managed to circumvent the imperial examination system through venality and other means, leading to an excess of candidates for official positions and a breakdown in the control of officials, ultimately causing instability in the realm of government (Yang, 2009, pp. 130–8). As a result, the sale of offices during the Qing suffered a certain level of stigmatization.

This difference in developmental paths results from a varied power relation patterns between monarchs and officialdom in the two countries. Both China and France in the seventeenth and eighteenth centuries were recognized for their highly centralized monarchies, where local officials served as the authorized representatives of the emperor or the king. The centralized emperor relied on local officials to collect taxes and maintain local governance in regions far from the capital. All this may sound reasonable; however, in the pre-modern era, substantial distances, long hours, inadequate transportation, and a system of paperwork handled via tiers rendered direct control of the entire empire expensive, inefficient, and at times impossible. How could a centralized absolute monarchy exert control over officers who were maybe 1,000 miles away?

Compared with France, the principal-agent problem was more significant in Qing China and royal rulers chose to allow a lower level of formalization of venal offices but in fact more tolerance of corruption despite the strict rules. Due to the vast expanse of his realm, the Qing emperor depended increasingly on bureaucratic organization to preserve stability. The Qing Dynasty maintained a low level of equilibrium stability (Li, 2019, pp. 49–67) and officials were only required to achieve the most fundamental competency requirements: maintaining stable local control and paying adequate taxes. The central government's disciplinary capacity was insufficient to oversee all officers in the empire's giant domain, and the informal income of officials rarely concerned the emperor if it did not endanger his rule. Therefore, it was logical for the Qing emperors to minimize the effect of venal offices, which provided only a small financial contribution, but constituted a significant challenge to the formal imperial examination system and was largely opposed by those officer-winners from the imperial exams.

In contrast, the French system in the old regime had a high degree of formalization and a high tolerance for venality and informal income. Official posts were seen as an asset and the monarch had little direct control over public office-holders. So long as there was no violation of specific rules or due process, the French monarch could not easily revoke an appointment to public office. In a way, the acquisition of property through official positions was deemed acceptable but still caused widespread public concern. Moreover, the French system had a closer connection with the financial strain of wars. Rapidly

increasing financial needs stretched the existing state machinery, necessitating further social mobilization and wealth. The endowment system arose at a period when reform was urgently required. It gave the king an opportunity to further expand the monarchy's influence and allowed the developing social elite to share power. The increasing scale of state revenue and the rapid growth in the number of venal office-holders paved the way for the French monarchs to reform the previous officialdom, disturbing the power distribution structure of the old system. Therefore, the sale of offices, which began with the same requirements and assigned equal responsibilities, took very different paths in China and in France due to their different power relations.

The sale of offices was founded at first to deal with fiscal emergencies and to provide support to the absolute monarchy when the monarchies of China and France each reached their zenith of power during the seventeenth and eighteenth centuries. Nevertheless, although they shared similar goals in responding to challenges, the evolution of the sale of offices in the two countries took contrasting paths in subsequent development. The French kings used the credit generated by their absolute monarchy to expand a more formalized venal office system into a new kind of credit finance. Conversely, the Qing emperors intentionally curtailed the level of formalization of the sale of offices and its influence on other formal systems, positioning it as a supplementary component to the formal system.

6. Conclusion

During the seventeenth and eighteenth centuries in China and France, it may appear that the sale of offices was always synonymous with corruption. Nevertheless, the underlying rationale in these two countries differed significantly and the difference could be attributed to the level of formalization. In France, the sale of offices had become deeply integrated into the formal systems, given its financial contribution and the virtuous loop in the context of reinforcement of absolute monarchy, restructuring of bureaucratic organizations, and the perception of corruption that stemmed from public dissatisfaction with judicial injustices. Conversely, during the same era in China, the sale of offices was viewed as corrupt because it posed a challenge to pre-existing formal institutions, particularly the integrity of the imperial civil examinations. It was suppressed and seldom taken as part of the formal systems in bureaucracy.

The varying associations of the sale of offices with corruption in China and France can be attributed to their distinct interactions with the formal systems. This sheds light on the complexities surrounding the sale of offices and its relationship with corruption and governance, offering a more comprehensive understanding of its role in the two distinct political landscapes of China and France during the seventeenth and eighteenth centuries.

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