

associates, if not the forger himself, attended the synod and personally influenced deliberations there. Nobody could yet have known his forgeries, which would not circulate for at least another seven years<sup>26</sup>.

The False Capitularies of Benedictus Levita restate the Paris 829 legislation on chorbishops in the abbreviated form of the *Episcoporum relatio*. They surround these *authentica* with forgeries that rehearse the whole of the abolitionist argument. Within the False Decretals of Isidorus Mercator, three separate forgeries, in the names of Ps.-Damasus I, our very own Ps.-Leo, and Ps.-John III, attack chorbishops along very similar lines. This campaign proved effective, for the office all but disappears from our sources by the end of the ninth century. When Pope Nicholas I enjoined the Franks in 864 from repeating consecrations that had been conferred by chorbishops, nobody seems to have paid attention<sup>27</sup>. The 893 Council of Metz decreed the opposite; basilicas consecrated by chorbishops were to be re-consecrated by regular bishops, *quia iuxta decreta Damasi papae, Innocentii et Leonis vacuum est atque inane, quicquid in summi sacerdotii chorepiscopi egerunt ministerio; et quod et ipsi iidem sint qui et presbyteri, sufficienter invenitur*<sup>28</sup>. The references are to Innocent I (J<sup>3</sup> 701), Ps.-Leo, and finally to Ps.-Damasus from the False Decretals.

An important preliminary question, is where in this chronology Ps.-Leo is best located. This is a forgery with clear ties to the abolitionist party, and it reflects the anxieties of these reformers, who aimed to eliminate a clerical office described in ancient canons of unimpeachable authority, and regarded as legitimate by the papacy and a greater part of the Frankish clergy. The canonical appendix that we find in the earliest version of Ps.-Leo opens, as we have seen, with c. 6 of the 829 *Episcoporum relatio* to Louis the Pious. The whole of Ps.-Leo preceding this citation does little more than equate chorbishops with priests and deny both offices all episcopal faculties. Ps.-Leo, in other words, says precisely what Paris 829 and the *Episcoporum relatio* leave

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na WATSON, *On Hospitals. Welfare, Law, and Christianity in Western Europe, 400–1320* (Oxford Studies in European History, 2020) p. 194–210 outlines, in the course of extensive analysis, important Pseudo-Isidorian influence also on c. 40.

26) The entire problem of Pseudo-Isidore's earliest reception – possibly as early as 852, certainly in 857 – is reviewed in FUHRMANN, *Pseudo-Isidorian Forgeries* (as n. 3) p. 173–176.

27) J<sup>3</sup> 5923, ed. Ernst PERELS (MGH Epp. 6, 1925) p. 634a l. 15–27; see also GOTTLÖB, *Chorepiskopat* (as n. 6) p. 130.

28) Metz 893, c. 8, ed. Wilfried HARTMANN (MGH Conc. 5, 2012) p. 311 l. 26–28; see also GOTTLÖB, *Chorepiskopat* (as n. 6) p. 134.