

Seville II, c. 7 can hardly be Benedictus Levita's only source here. The figure of a pope Leo alone suggests a more specific relationship with Ps.-Leo, as do the variants *chorepiscopis ... vel presbyteris* (instead of *presbyteris vel chorepiscopis*) with *formam*. And if we accept this tenuous proof and expand our view, we can appreciate what appears to be Benedictus Levita's effort to avoid explicit verbal resonance with his source, which becomes its own kind of proof. Thus Ps.-Leo extravagans speaks of *presbyterorum et diaconorum ac virginum consecratio*, while BL 3.423 wishes that no chorbishop presume *sacerdotes vel levitas ... sacrare* or *virgines velare*.

The False Decretals emerged substantially later than the False Capitularies, and well after Paris 829. They incorporate the entirety of the capitulary forger's polemic against chorbishops, although with important changes in emphasis and style. In part, this shift reflects Pseudo-Isidore's broader and not unsophisticated attempt to establish his own false legal tradition with respect to chorbishops, which emerges as a charade in which the False Capitularies and the False Decretals have different roles to play. Our forger's conceit is that chorbishops were utterly prohibited by popes of old, including the popes of the False Decretals; but that Pope Leo III granted Charlemagne a compromise, according to which chorbishops in the Frankish kingdoms would be allowed to retain their offices, so long as they humbly confined themselves to the position of priests. Hanging this sword of Damocles over the entire Frankish and German chorepiscopate required Benedictus Levita to take a slightly more tolerant line, while the False Decretals had to rail against chorbishops unreservedly. Only in this way could the ancient prohibition be reconciled with more permissive recent history.

Properly read, then, the decretal and the capitulary forgeries are far closer to each other in their legal vision on this point than is sometimes assumed. In the direction and insistence of his attack, however, Isidorus Mercator departs dramatically from Benedictus Levita. The significance of the capitulary forger's distaste for the chorepiscopate is never clear; considered in isolation, BL 3.260 and its companion pieces seem simply to reflect the forger's reformist convictions. The False Decretals of Isidorus Mercator, with their less guarded approach, cast the entire chorepiscopal programme of the forgeries in a different light. While Pseudo-Isidore might well have hated chorbishops more generally, almost everything that flows from his pen at the level of the decretal forgeries takes very specific aim at the legal and scriptural arguments that Hrabanus Maurus raised in defence of the institution