Honor, Gender and the Law: Defense Strategies during the Spanish Inquisition, 1526-1532

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Honor, Gender and the Law:
Defense Strategies during the Spanish Inquisition, 1526-1532

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Approved by the Committee, April, 2010

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In the last forty years the view of the Spanish Inquisition as tyrannical and cruel has been overturned in favor of a more nuanced outlook. With the fall of the Black Legend historians have discovered that the Inquisition employed a functioning legal process that required the accused to mount a defense. In exploring the Inquisition trials of known alumbrados Antonio de Medrano and María de Cazalla, I have surveyed several of the possible defense tactics available to those who faced the Spanish tribunals. What follows is not a narration of these two trials, but rather an analysis of excerpts from each. My research has revealed that defense tactics could take many forms: defendants were willing to challenge the inquisitorial system, utilize their familiarity with the prevailing legal culture and their knowledge of inquisitorial procedure, as well as exploit contemporary ideas about the place of women in society in order to secure their freedom. It is therefore no longer appropriate to assume that all inquisition defendants were victims of a rigid inquisitorial process as all were given the opportunity to defend themselves, and some were quite resourceful in the strategies they employed.
I dedicate my master’s thesis to my husband, Jason, whose sacrifices made this project possible.
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Lastly, I would like to thank my husband, Jason. None of this would have been possible without his love and encouragement, which is why I dedicate my thesis to him.
It was a twist of fate that caused the Toledo tribunal of the Holy Office of the Inquisition to uncover secret correspondence between its prisoners. In 1533 the tribunal’s despensero came across a package wrapped in unusually white paper. Believing he held something suspicious, he inspected the paper in front of live coals and noticed that letters began to appear. When a second similar discovery was made a few days later, he reported his findings to the tribunal’s inquisitors. The ensuing investigation revealed that one of the tribunal’s prisoners had been communicating with his brother on the outside and had, in turn, relayed the information he received to his associates within the prison’s walls.\(^1\) Given the air of secrecy surrounding the Inquisition, in which defendants swore an oath not to discuss their trials and were barred from communicating with one another, the inquisitors began a massive investigation to uncover the depths of this deception. While this breech in the Inquisition’s code of secrecy was alarming, it was not the only instance of prisoner subterfuge.

The Toledo tribunal was confronted by covert communication within its walls on at least two other occasions. In 1529 a Franciscan friar was imprisoned for publicly accusing the Inquisitor-General of committing a sin in arresting one of his closest spiritual advisers. This friar was held in Toledo at the same time as his adviser, and it was rumored that the two visited one another through holes in the prison’s walls. Unfortunately, there is no record of their supposed interactions and we therefore do not know the extent to which they may have counseled one another.\(^2\) Perhaps more alarming to inquisitors was the violation of every rule banning contact between prisoners,

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\(^1\) For the full narrative of these events please see Lu Ann Homza, *Religious Authority in the Spanish Renaissance* (Baltimore: The John’s Hopkins University Press, 2000), 17-22.

discovered in 1591. Prompted by rumors of illicit communication between prisoners, a *visita* was ordered and the ensuing investigation uncovered corruption throughout the tribunal. It seems that a group of prisoners not only sent letters of advice to one another, but were allowed visits within the prison walls and were given special privileges by two of the inquisitors.3 These instances of prisoner subterfuge reveal that defendants were willing to do almost anything in order to obtain any information that would assist in their defense. This meant, when possible, exploiting connections both inside and outside the prison in order to gauge how to defend themselves. The available records indicate that lists of accusations, witness lists, and general legal advice were possibly exchanged in the trials mentioned above. I would argue that if these prisoners were able to successfully strategize with other inmates, other inquisition defendants were as well.

Although Hispanists are now aware that inquisitorial procedure required each defendant to mount a defense, the nature and array of available defenses have yet to be surveyed in sufficient detail. It is with this in mind that the present study explores several of the possible defensive maneuvers available to those facing the Spanish Inquisition. In doing so I hope to add to the body of scholarship that portrays a more nuanced view of the Spanish tribunals. It is my opinion that inquisition defendants were not hapless victims of a rigid inquisitorial process; all were offered the opportunity to defend themselves, and some were quite inventive in the strategies they utilized. Although not all were successful in their defense, it speaks volumes that they even tried.

What follows is an exposition of the defense strategies utilized by two *alambrados*, Antonio de Medrano and María de Cazalla. These defendants were well

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versed in the legal culture of their day, and their ability to call on that knowledge throughout their trials was one of the more impressive aspects of their defenses. Although Medrano and Cazalla both exploited their familiarity with legal and inquisitorial procedure to their advantage, how they applied that knowledge was just as varied as the style of defense they each utilized. Medrano, in an attempt to establish some sort of connection with his inquisitors, argued that his status as a cleric and the vanity of the women who testified against him should have cleared him of all charges. Unable to adopt the same method, Cazalla utilized her rhetorical mastery and ability to play into sixteenth century stereotypes about women as the basis for her defense. While the approach to each defense may have been different, I would argue that the energy of their arguments were just as calculated as the distinctive styles they each utilized.

The Spanish Inquisition was instituted in an era of great turmoil on the Iberian Peninsula. The *convivencia*[^1] that was once thought to exist between Catholics, Jews, and

[^1]: *Convivencia*, a Spanish word that translates to “living together” or “coexistence,” is a highly contested term in Spanish historiography. The debate began with the publication of Américo Castro’s *España en su historia: cristianos, moros y judíos* (Princeton, NJ: Princeton University Press, 1954), wherein he argued that Spanish culture resulted from the interaction of Muslims, Christians, and Jews in the eighth through thirteenth centuries. This work was later challenged by Claudio Sánchez-Albornoz who, in his *España: un enigma histórico*, 2 vols. (Buenos Aires, 1956), argued that the nature of contact between Jews, Muslims, and Christians was combative and not conducive to cultural exchanges, and that Spanish culture was either idiosyncratic or based on Roman or Gothic elements. For an analysis of the extensive debate between these two scholars see Thomas F. Glick, *Islamic and Christian Spain in the Early Middle Ages* (Princeton, New Jersey: Princeton University Press, 1979), 6-13.

Castro did not define *convivencia* as a peaceful existence between these three diverse groups; it has inherited this meaning from a group of historians who believe Christian Spain was tolerant of religious minorities prior to the expulsion in 1492. Norman Roth is perhaps one of the more prevalent proponents of this view, see his *Jews, Visigoths and Muslims in Medieval Spain: Cooperation and Conflict* (New York: E.J. Brill, 1994), or “The Jews in Spain at the Time of Maimonides,” in *Moses Maimonides and His Time* Studies in Philosophy and the History of Philosophy 19, ed. Eric L. Ormsby (Washington, D.C.: The Catholic University of America Press, 1989), 1-20, for examples. Roth’s position is challenged by adherents of the Jerusalem school of interpretation, which argues that Judaism, since the fall of Jerusalem, has been plagued by a progression of misfortunes from that time forward. Yitzhak Baer’s *A History of the Jews in Christian Spain*, 2 vols., trans. Louis Schoffman (Philadelphia: The Jewish Publication Society of America, 1961) is the standard text for this school of thought.

Falling somewhere in the middle of this debate is David Nirenberg, whose polemic *Communities of Violence: Persecution of Minorities in the Middle Ages* (Princeton, NJ: Princeton University Press, 1996)
Muslims had been shattered by the late fifteenth century: the bloody pogroms of 1391 and the forced baptism of the Jewish community, coupled with the *reconquista* or reconquest of the Islamic hold-out of Granada in 1492, brought religious difference to the forefront of Iberian life. The term *converso* soon came into popular use to denote one who converted from Judaism to Christianity. When, in the late fifteenth century, the Spanish Monarchs were told of a rise in the number of *conversos* who were secretly practicing their old Jewish ways – known as crypto-Judaism – they sought to eradicate these false converts with the establishment of the Holy Office of the Inquisition. In 1478 Ferdinand and Isabella obtained the papal bull necessary for its formation.

The history of the Inquisition, like many pre-enlightenment phenomena, has been tainted by mythology. The Black Legend, a term coined in 1914, was the result of sixteenth century Protestant fears of Catholic domination, and the spread of the Inquisition to Protestant lands. English Protestant John Fox described the Spanish Inquisition as “the most dreaded of any,” noting that, “even the kings of Spain themselves, though arbitrary in all other respects, were taught to dread the power of the lords of the Inquisition.”

His was one of many contemporary accounts that sensationalized the aims, methods, and power of the tribunal. Unfortunately the Inquisition continues to bear the weight of this legend. Historiographically, it is only in recent years that the trend has shifted from accepting the Black Legend to refuting its tenets: the “historical turn” that took place in the 1970s has led to a revision in the challenges, and yet agrees, with aspects of these two doctrines. He disagrees with the idea of a peaceful *convivencia* on the Iberian Peninsula, yet argues persuasively that medieval Iberian violence acted as a regulatory force between Jews, Christians and Muslims, making their coexistence possible.

historiography of the Holy Office. In light of recent developments, it is no longer appropriate to think of the Inquisition as a well-oiled machine: the variation between idea and practice, as well differences among tribunals, confirm that its perceived hegemony was never a reality.

Inquisition historiography came into being in the mid sixteenth century when the first history devoted exclusively to the Holy Office was published. Written by inquisitors, Catholics, and Protestants, the majority of early inquisition histories were biased by the confessional allegiance of the author, resulting in an uneven treatment of the Holy Office. Based more on secondary than primary material, these texts did little to raise the treatment of the Inquisition out of the realm of myth to true history. It was not until 1818, with the publication of Juan Antonio Llorente's polemical *Histoire critique de l'Inquisition d'Espagne*, that more historical, less inflammatory inquisition scholarship began. Based on archival sources rather than secondary material, this text set new standards in inquisition scholarship. As a result, future scholars began to utilize archival material as the basis of their inquisition histories.

Beginning in the late nineteenth century research on the Inquisition witnessed a dramatic rise, with scholars from around the globe taking a scholarly interest in the Holy

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8 Edward Peters, *Inquisition*, (New York: Macmillian, Inc., 1988), 278. Peters points out that the documentation utilized by these authors included printed material produced by the inquisition, personal narratives, martyrologies, and occasional inquisitorial documents.

The most extensive of these texts is the four-volume *A History of the Inquisition of Spain* by American historian Henry Charles Lea, published in 1906. Although critical of the Holy Office, Lea’s work breaks with the historiographical trend of Llorente by presenting a more methodical and chronologically sweeping analysis of inquisition records and other documentary evidence. Lea believed that the fault of previous scholarship was that the Inquisition had been studied from the point of view of nineteenth century standards, and not in terms of its own culture:

> It was rather the natural – one may almost say an inevitable – evolution of the forces at work in the thirteenth century, and no one can rightly appreciate the process of its development and the results of its activity without a somewhat minute consideration of the factors controlling the minds and souls of men during the ages which laid the foundation of modern civilization.

Although speaking about the medieval inquisitions, Lea’s point rings true for the Spanish tribunals of the early modern period. Credible scholarship on the history of the inquisitions must consider the context in which those institutions were created. The logic of this method is clear: in adopting a more contextual approach to inquisition scholarship, historians would be more likely to produce accurate and objective work. Ironically, Lea’s own text is slightly biased as it too falls prey to post-enlightenment

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10 Gustav Henningsen, “The Archives and the Historiography of the Spanish Inquisition,” *Inquisition in Early Modern Europe: Studies on Sources and Methods*, ed. Gustav Henningsen and John Tedeschi, (Dekalb, IL: Northern Illinois University Press, 1986), 61; Peters, *Inquisition*, 291. These authors cite the work of scholars such as Romero de Castilla, Toribio Medina, Carlo Alberto Garufi, Ernst Schäfer, and Desdevises du Désert, among others, who each provided their own take on the tribunals in Spain or her dependencies.

11 Henningsen, “The Archives and the Historiography,” 61-63. Although Lea never set foot in the Spanish archives, he was able to obtain manuscripts on loan and hire people to copy those that were not sent to him in the United States.


13 The Medieval Inquisition was created in response to the Cathar heresy while the Spanish Inquisition was founded to combat the *converso* problem that was spreading throughout the peninsula.
judgment of pre-enlightenment phenomena. Yet regardless of its flaws, Lea’s *History of the Inquisition* remains one of the most extensive histories of the Spanish Inquisition ever written.

Following Lea’s death in 1909 research on the Inquisition continued to lack contextuality until the 1970s, when the next phase of inquisition studies came into being. Two events mark this shift in scholarship: the rise of social history and the death of Francisco Franco in 1975. Beginning in the 1960s the field of history underwent major methodological changes. Historians began to realize that history written from the point of view of monarchs, statesmen, and the bourgeoisie – the “top down” approach – represented only the smallest fraction of society. This led to the creation of social history, a branch of historical scholarship that employs anthropological and sociological methods to better allow access to the voices of ordinary people and popular culture. As social history was gaining momentum within the field at large, Franco’s death allowed inquisition scholars access to the sources needed in order to explore the ‘common man’ in inquisition history.

The first wave of this new scholarship concentrated on the Inquisition as an institution. Scholars attempted to describe its common features and patterns of prosecutions over time, often employing quantification. Focusing on inquisition

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tribunals, these texts have provided information on the Inquisition’s policies, geographical expanse, and victims. Historians soon learned that there was a shift in the focus of the Inquisition: while *conversos* were the first target, Christians accused of moral offenses (bigamy, sodomy, solicitation, etc.), Christian blasphemers, Lutherans, and eventually *moriscos* fell under the gaze of the Holy Office, and *conversos* once again circled into view after 1580. Death rates were found to be much lower than expected:

there may have been a significant number of Inquisition trials, but relatively few defendants were relaxed to the secular arm. Lastly, the Inquisition employed a functioning legal process that did not always work perfectly, but did allow for a defense.

As the analytical lens turned on the inquisition was shifting, scholars began to investigate popular belief and lived religion. In order to reach the voices of the everyday man, historians began to consult the records of judicial proceedings. Inquisition transcripts, although imperfect, may allow scholars a chance to hear the voices of the

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17 The Inquisition’s second campaign against the *conversos* focused on those New Christians who had emigrated from Portugal.
18 Jaime Contreras and Gustav Heningsen, “Forty-Four Thousand Cases of the Spanish Inquisition (1540-1700): Analysis of a Historical Database,” *Inquisition in Early Modern Europe: Studies on Sources and Methods*, ed. Gustav Heningsen and John Tedeschi, (Dekalb, IL: Northern Illinois University Press, 1986), 125. Reviewing inquisition case summaries, *relaciones de causas*, these scholars demonstrated that the Holy Office executed relatively few people following 1540, that the inquisitorial campaign against ‘major heretics’ (*Judaizers, Moriscos, Lutherans, and alumbrados*) made up less than half of the prosecutions after 1540, and that the “Old Christians” prosecuted for heretical propositions, bigamy, solicitation, and superstition and witchcraft, were punished by the Inquisition as part of the Catholic Reformation that began before the Council of Trent.
19 Although quantitative studies helped to revise scholarly opinions of the Inquisition, they remain an insufficient source of information on the Holy Office. Since inquisition records survived in much greater numbers following 1540, the results of these statistical studies were flawed as they could not represent the full tenure of the Holy Office; moreover, in its first four decades from 1480-1520, when *conversos* were the primary target of the Inquisition, death rates were presumably the highest. The sources considered for these studies also proved to be problematic. The *relaciones de causas* utilized in no. 18 above are an imperfect sources as the information they provide is inconsistent: the amount of detail requested by the *Suprema* relating to the crimes and punishments of the accused changed over time, meaning details that may have been pertinent to the validity of this statistical study were not always available (such as age, sex, and the domicile of each defendant). Not only was the information provided in the *relaciones* unreliable, tribunals often neglected to send these documents to the *Suprema*, resulting in geographical gaps in this statistical study.
accused, the tried, and the convicted: “except for the fact that the notaries of the Holy Office translated the testimony... it is fair to say that the voices of these peasants reach us directly, without barriers, not by way, as usually happens, of fragmentary and indirect testimony.”

Italian historian Carlo Ginzburg was the first to write a social history based on the records of the Roman Inquisition. His influential *I Benandanti* details the beliefs of a fertility cult, the benandanti, who believed they were defenders of harvests and the fertility of fields. While they identified as Christians, their practices so resembled witchcraft that inquisitors were able to convince the benandanti that they were in fact witches.

As Ginzburg’s work was gaining popularity outside of the Italian speaking world, anthropologist William A. Christian published his seminal *Local Religion in Sixteenth-Century Spain*. This text explores lived religion through questions asked in the *Relaciones topográficas* sent by Philip II from 1575-1580 to the people of New Castile. His research has revealed that local religious practices often varied from those of the Church, that these beliefs were highly flexible, and that locals resisted most attempts to enforce Tridentine reforms. Ginzburg and Christian have demonstrated that relations between ecclesiastical authorities and the laity were not unidirectional: while a more

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20 Carlo Ginzburg, *I benandanti: ricerche sulla stregoneria sulla stregoneria e sui culti agrari tra Cinquecento e Seicento*. (Torino, Italy: Giulio Einaudi, 1966). Quote from English Edition, *The Night Battles: Witchcraft and Agrarian Cults in the Sixteenth and Seventeenth Century*, (Baltimore: The Johns Hopkins University Press, 1992), xvii. In Roman inquisitorial procedure notaries were required to document the testimony of witnesses and defendants verbatim. Therefore, if the testimony was copied and translated correctly these documents allow direct access to the voices of those who appeared before the tribunal.

21 William A. Christian Jr., *Local Religion in Sixteenth-Century Spain*, (Princeton, NJ: Princeton University Press, 1981). Christian’s work was guided by two main questions, the first relating to relics, chapels, and miracles that had taken place, the second pertaining to the reasons for the observance of local holy days and feast days. While the content of this text is significant, Christian’s methodologies were perhaps more instructive as they provided a new means of access to lived religion. He adopted an anthropological approach in which he conceived of his subjects as ‘others’, and opted to focus on the local populations of Spain.
universal Christianity was the goal of the elites who were promoting religious reform, local beliefs prevented this vision from becoming a reality.

Christian’s work, coupled with Ginzburg’s, inspired a generation of Hispanists to approach the study of inquisitorial procedure in terms of the local, and to be alert to the interactions between elite and popular culture. These studies have highlighted specific groups of victims in specific locations, uncovered procedural variation between tribunals, and demonstrated that the focus of each locality was almost never the same.²² Recent research has demonstrated that literacy rates in sixteenth century Spain were much higher than previously thought, and that local religion, though subject to the Tridentine reforms, was fluid and much more difficult to eradicate than expected.²³

Another subset of local religion has been studies of individual defendants. This line of scholarship has revealed that defendants, once thought to be hapless victims of a rigid inquisitorial process, had a voice when confronted by their inquisitors. Some even attempted to defend themselves.²⁴ Perhaps the most notable scholars linked to these trends are Sara T. Nalle and Carlo Ginzburg. Nalle’s most recent book tells of one man’s


confrontation with the Inquisition: the unorthodox nature of his beliefs, and his steadfast adherence to them, led to frustration and, later in the trial, empathy on the part of his inquisitors, revealing the inconsistent nature of the inquisitorial process. Ginzburg’s *The Cheese and the Worms* tells the story of Domenico Scandella, known as Menocchio, a defendant in the Roman tribunals who baffled inquisitors with his heretical beliefs that seem to have stemmed from his exposure to a wide range of religious texts. The similarities between these two defendants are fascinating as they confirm the variety of seemingly heretical beliefs that existed throughout sixteenth century society. Their trials also reveal that a dialogue between inquisitors and defendants was possible, adding weight to the scholarly contention that the relationship between inquisitors and defendants was not as black and white as once thought.

As historians continue to uncover documentation on individual defendants, research into defendant agency and defense schemes has flourished. Although focused on the individual on trial, these texts have also uncovered the role that cultural concerns—false sanctity, the weakness of women, false confessions, and ideas of insanity—played...

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25 Nalle, *Mad for God*. Nalle notes that the relationship between the defendant, Bartolomé Sánchez, and his inquisitor Pedro Cortes, was unusual. Since Cortes believed Sánchez to be mentally ill, he spent many hours conversing with Sánchez in order to get him to recant. “The result is a document that records a lively debate between two individuals,” a dialogue that did not often exist between inquisitor and prisoner (4).

26 Carlo Ginzburg, *Il formaggio e i vermi: il cosmo di un mugnaio del’500* (Torino: G. Einaudi, 1976). While this text was groundbreaking, Ginzburg’s approach has been deemed problematic by many scholars. Critics have questioned his overly simplified two-cultures model (learned v. popular culture), pointed to his unwary reading of inquisition sources, and argue that he underestimated the originality of Menocchio’s beliefs. Andrea del Col’s *Domenico Scandella ditto Menocchio: I processi dell’Inquisizione (1583-1599)* (New York: Binghamton, 1996) provides the best critique of Ginzburg’s work. This text provides readers with the full transcript of both of Menocchio’s inquisition trials as well as detailed appendices and a thorough introduction. The major point of departure between these scholars is in the source of Menocchio’s beliefs: where Ginzburg argued that Menocchio’s cosmology stemmed mainly from oral transmission—a populist interpretation—del Col believes that the roots of Menocchio’s beliefs can be found in religious texts and in Catharism.
in inquisition trials.\textsuperscript{27} The shortcoming of these studies is that defense is not the ultimate focus and therefore little analysis is applied to the creation and application of defense tactics. To my knowledge the only scholars to explicitly explore defense strategies in any detail are Lu Ann Homza and Gretchen Starr-LeBeau.\textsuperscript{28} Homza’s studies of the Inquisition trials of Juan de Vergara and Francisco Ortíz confirm that educated individuals were intelligent in crafting their defense: these men utilized a theological and legal language their inquisitors could comprehend and mounted multi-faceted defenses that stunned, if not offended, their inquisitors. Meanwhile, Starr-LeBeau’s recent research explores the ways in which \textit{conversos} and \textit{moriscos} attempted to construct cohesive narratives of their experiences in order to justify their actions to inquisitors. She points to three commonly employed narratives – narratives of repentance, narratives of resistance, and unpersuasive narratives or the absence of a narrative – as the means by which even those with a basic understanding of inquisitorial procedure attempted to mount a defense. These scholars have proven that defendants could exploit the inquisitorial process to their advantage, invoking the correct language and procedural know-how necessary to defend themselves. My reading of the trials of María de Cazalla and Antonio de Medrano confirms this to be the case as Medrano and Cazalla were able to call on their knowledge of inquisitorial processes throughout their defense.

Cazalla and Medrano were highly-visible members of a spiritual movement called \textit{alumbradismo} that began in the early sixteenth century near Guadalajara. The

\textsuperscript{27} These micro histories include Nalle’s \textit{Mad for God} and Kagan’s \textit{Lucrecia’s Dreams}, both of which include brief discussions of defense tactics.

alumbrados were one of the more fascinating spiritual groups to have come to the attention of the Inquisition; their movement was a wholly Spanish phenomenon that troubled ecclesiastics as much as it interested them. The term alumbrado means illuminated ones: alumbrados believed in an internal spirituality that allowed them to be illuminated by God. Practitioners of alumbradismo felt no need for the external ceremonies of the Church, and did not believe that priests were necessary intermediaries for divine communication. The alumbrados attributed their beliefs to scripture, and this foundation seems to have attracted clerics and laymen alike. Although aware of the existence of the alumbrados as early as 1519, the Inquisition did not develop a formal interest in the sect until the mid 1520s, following the spread of the Lutheran texts and ideas on the Peninsula. The first arrests took place in the spring of 1524 when the Toledo tribunal began formal proceedings against Pedro Ruiz de Alcaraz, Isabel de la Cruz, and Gaspar de Bedoya. Inquisitorial interest in this phase of the alumbrado movement lasted into the 1530s when the final arrests took place.30

While scholars have been fascinated by the alumbrados since the nineteenth century, the first survey of the movement did not appear until 1936. Prior to the publication of Bernardino Llorca’s La Inquisición española y los Alumbrados, scholars mentioned the alumbrados in larger surveys of the Inquisition or wrote articles about the

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29 Alastair Hamilton, Heresy and Mysticism in Sixteenth-Century Spain: The Alumbrados, (Toronto: University of Toronto Press, 1992), 60. On May 13, 1519 Mari Núñez denounced her rival Isabella de la Cruz and two others associated with the alumbrados, Pedro Ruiz de Alcaraz and María de Cazalla. These were the first denunciations related to the alumbrados, Hamilton, Heresy and Mysticism, 51.

30 María de Cazalla, Juan de Vergara, and Francisco Ortiz were some of the last suspected alumbrados arrested. It should be noted that there were three movements that fell under the name Alumbrado: the first in Toledo in the early sixteenth century, one in Llerena later in the sixteenth century, and another in Seville in the early seventeenth century.
movement. Llorca’s work, important to those interested in the *alumbrados*, was soon outdated when scholars uncovered one of the most important documents related to the movement: the 1525 edict against the *alumbrados*. The discovery of this text led some Hispanists to revisit the *alumbrado* movement, but not in survey form: the scholarship that followed has focused more on its individual practitioners than the sect as a whole. This fragmentation within the scholarship has resulted in an uneven treatment of the movement; of the three surveys that have been published since Llorca’s, none has provided enough detail or context to constitute a sufficient survey. The deficiency in all of these texts is that scholars have tended to place the *alumbrados* into misleading categories. Three trends have remained prevalent throughout this historiography: to assess the influence of Luther and Erasmus as authorities in *alumbrado* beliefs, to understand the group through an overview of its origins, or to define them within the larger context of Spanish spirituality. To place the *alumbrados* in these categories gives


the mistaken impression of a unified sect and dismisses other influences and tenets of their beliefs. Recent work by Italian scholar Stefania Pastore rejects these categories, and, as a result, has altered our perception of what *alumbradismo* connotes. Scholars would do well to follow Pastore’s lead and continue to investigate the *alumbrados* without such labels. Nevertheless, a thorough reading of the available scholarship will provide scholars with the details necessary to understand the basics of the *alumbrado* movement.

Research into the extant inquisition trials of specific *alumbrados* reveals that they were familiar with the legal culture of their day, and how to exploit tenets of that culture to their advantage. María Nuñez and Francisca Hernández, for example, were enacting their revenge on María de Cazalla when they provided damning testimony against her to the Toledo tribunal. Yet Nuñez and Hernández were not the first to exploit the courts as a form of vengeance; the practice of manipulating legal proceedings for personal gain had existed since the classical period. The idea that plaintiffs were active in shaping the trials they instigated is hardly new. Scholars of the medieval and early modern periods have demonstrated the ways in which litigation became a new form of vendetta. In these instances revenge was enacted through the court system, in a legally controlled and

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34 Stefania Pastore, *Un'eresia spagnola: spiritualità conversa, alumbradismo, inquisizione (1449-1559)*, (Florence, 2004). Her work focuses on the role of *conversos* and a flexible brand of "*converso* spirituality" to which *conversos* and non-*conversos* alike, including the *alumbrados*, adhered.


monitored way. Similarly, the protection of honor provided another reason many chose to pursue legal action against their enemies; plaintiffs often sought the official record of a legal proceeding to clear one's good name. The scholarship on this topic is clear: users of the courts were consciously manipulating the legal system to make it work to their own advantage. This means that defendants, too, were able to exploit the courts. Civil and inquisition trials from the medieval and early modern periods reveal that many defendants attempted to defend themselves on legal grounds, utilizing those tenets of Roman and canon law that were known by the majority of the population. While the wealth of recent scholarship on this topic has certainly been informative, there is still much to uncover. As scholars persist in exploring the pervasiveness of this legal culture, their work will continue to illuminate our understanding of how it functioned in practice.

In order to grasp the significance of defensive strategies we must first understand the basics of Inquisitorial procedure. Inquisition trials began with witness depositions given under oath, which were ratified at a later date in order to be entered into evidence. The tribunal could then decide to actively pursue additional witnesses, or wait for more evidence.

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deponents to come forward. When inquisitors questioned whether the evidence collected involved heresy, they consulted *calificadores*, theological experts who reviewed the facts and advised which heresies were worth prosecuting.\(^{40}\) Only when enough damning evidence had been collected – and this was at the discretion of the inquisitors – was an arrest made.\(^{41}\) The inquisitors then held three separate meetings with the defendant in order to admonish him to state the cause of his arrest, and to confess any information that he may have had about other suspects. If the defendant confessed during the admonition period, there was no trial.

The actual trial began when a list of charges was drawn up and read to the defendant formally accusing him of heresy. Defendants were expected to provide immediate oral responses to the accusations. These charges omitted any information that would have allowed him to identify those who had testified as the Inquisition adhered to a strict principal of secrecy when it came to witness testimony. Once the defendant had provided oral responses, the accusations were transcribed and a copy was given to the defendant who was then expected to provide a written reply.

Since the defendant did not know who had testified against him, he had very few defense strategies available. First, he could call character witnesses who would testify to his adherence to Christian beliefs and practices, called *abonos*. He could also attempt to invalidate the prosecution’s witnesses through a strategy called *tachas*; here the defendant had to guess the identity of adverse witness and provide proof that this person was a capital enemy or bore him ill will. In these two schemes the defendant would draft

\(^{40}\) Heresy was not a finite concept; it too changed as notions of orthodoxy evolved. *Calificadores* were needed to ensure that only those cases involving heresy were tried.

\(^{41}\) It was at this time that the suspected heretic’s goods were confiscated and inventoried. It was through these confiscated goods that the prisoner’s food and clothing were paid for. In cases where the poverty of the prisoner prevented this from happening, the tribunal provided his food and clothing.
the questions to be asked of the witnesses in order to prove these points. Lastly, defendants could also attempt to disqualify an inquisitor or prosecutor by accusing them of capital enmity or they could refuse to mount any defense at all. It should be noted that defendants were free to request additional hearings or to confess at any time during the trial.

Once the defendant and witness testimony had been completed, ratified, and entered into evidence the inquisitors would consult with outside theologians and a representative of the local bishop regarding the verdict and sentence for the trial. When weighing the evidence before them, these theologians had to consider whether or not the evidence against the defendant constituted complete or partial proof of a crime. The testimony of one eyewitness was not enough for a conviction; two or more people had to witness a given heresy or confession in order for the evidence to be considered complete. In cases where the evidence was not conclusive or the defendant had failed to confess, a session of torture could have been requested in order to elicit a confession. Torture was conducted by a trained professional within the walls of the tribunal; these sessions were to be attended by at least one inquisitor and a scribe who recorded anything said by the defendant. If the defendant confessed during torture he was asked to ratify his statements on another occasion; if this confession was revoked, he could face another round of torture.

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42 These outside theologians or legal experts were called consultadores and the bishop’s representative was called the ordinario.
43 There were three types of torture commonly applied by inquisitors: the toca whereby water was poured into the defendant’s nose and mouth to simulate drowning; potro also known as the rack, to which defendants were bound with cords that were tightened; and garrucha in which the defendant was tied from behind and then hung by his wrists. Homza, *The Spanish Inquisition*, xxv.
44 Although the Black Legend of the Spanish Inquisition was quick to cite torture as one of the more common practices of the Holy Office, scholars now believe that it was rarely used and was not as harmful as was previously thought.
Since those on trial were presumed guilty and were rarely acquitted, when inquisitors were unable to prove the heresy against any given defendant they had two options. The first was compurgation, a process whereby the defendant would call a certain number of witnesses who would swear to his Christianity; once these oaths were received, if they were all favorable, the defendant would be absolved and released.\(^\text{45}\) Alternatively, inquisitors could opt to suspend the case until further evidence presented itself. This is not to say that the case was closed, rather that it was pending; the charges from this previous trial would have been included in that of the new trial. When sufficient evidence was presented or a confession was offered, a verdict would be handed down; the severity of the decision depended on the nature of the heresy in question and the demeanor of the defendant. Those on trial for major heresies such as judaizing, Protestantism, or the practice of Islam, who confessed and named accomplices, were spared excommunication and were “reconciled” to the Church. A verdict of “penanced” was available to those accused of lesser heresies such as blasphemy, bigamy, or sodomy who also confessed and identified accessories; in these instances the defendants were reconciled to the Church with a light (\textit{de levi}) or severe (\textit{de vehementi}) suspicion of heresy.

Whether “reconciled” or “penanced”, these heretics were often ordered to complete some sort of penance for their crimes. These penances were handed down in an act of faith or \textit{auto de fe}, which was held in a public square an often drew huge crowds.

Many heretics were sentenced to wear \textit{sanbenitos}, knee-length yellow smocks adorned

\(^{45}\) Homza, \textit{The Spanish Inquisition}, note on p. xxv-xxvi. Homza points out that not all witnesses were willing to swear to a defendant’s Christianity; if, for example, a defendant called a witness who was unwilling to testify on his behalf, he would not have been absolved. The defendant was at a disadvantage here because he was not privy to the names of those who had testified against him and it was possible that he would have called someone who had, in fact, been an adverse witness.
with a cross, for a designated length of time, after which it would be hung in their parish
church detailing their names and heresies. Others were enclosed in a monastery or
convent, sent to “perpetual prison”, ordered to sponsor and attend a specified number of
masses, or to pay a monetary fine. The worst of these penances was galley service in the
King’s fleet which amounted to a sentence of death.

A sentence of death was reserved for those who had previously been convicted of
heresy but had relapsed, or who refused to confess in the face of overwhelming evidence.
Inquisitors were unable to shed blood themselves, therefore these sentences were carried
out by secular officials; once the sentence was handed down the defendant would be
relaxed, or handed over, to the secular arm. Death at the stake was the preferred method,
a sentence that was carried out outside of city walls. If a heretic confessed on the way to
his execution, the inquisitors were to evaluate the sincerity of the confession; they could
chose to return him to the Holy Office for further scrutiny or proceed with the execution
– this was at the discretion of the inquisitors. While burning was guaranteed, those who
confessed and repented while in route were customarily strangled before-hand; those who
remained unrepentant were burned alive.

Regardless of the outcome of inquisition trials, all defendants were sworn under
oath to keep secret everything they had seen or heard in the process of their trial. They
were asked not to discuss any aspect of their trial with other prisoners or, if penanced,
with anyone outside. Given the Inquisition’s penchant for record keeping, it seems that
inquisitors imagined inquisition transcripts would be the only source of information about
what took place within the walls of each tribunal. Although secrecy was a major tenet of
inquisitorial procedure, it seems that it was not always maintained. As we will see, those
imprisoned within the tribunal walls could and did communicate with their friends or relatives outside.

Inquisition transcripts provide a window into inquisitorial procedure and the ability of the accused to mount a defense. Yet the use of Inquisition transcripts in historical analysis is problematic for many historians: these records are full of gaps in transcription, leading questions, and recorded answers that reflect only what the notaries thought was relevant. This makes the interpretation of these documents challenging at best, as historians are unable to determine the accuracy of the responses provided. Simply put, it can be nearly impossible to distinguish the witnesses' and defendants' voices from those of the Inquisition notaries. Not only is accuracy an issue, but scholars are constantly questioning the sincerity of the recorded testimony. Defendants and witnesses were typically under pressure to provide the answers they thought would do the least amount of harm to their case. Historians therefore have no way of knowing if what is recorded was what the witnesses and defendants really thought, or what they thought their inquisitors wanted to hear. 46 Awareness of the inherent flaws of these documents means scholars must read through these trials with an eye for detail in order to gain as much untainted information as possible – not an impossible task. Historians will continue to work with these documents as they are one of the few means of access to the voices of those on trial; in some cases, such as the alumbrados, inquisition transcripts are the only records available. Scholars are now well aware of the flaws within these records and therefore should be able to proceed with a more nuanced analysis of the information contained therein.

46 See Homza, Religious Authority, 5-6 for a more detailed description of these issues.
The need for inquisition defendants to form defensive strategies stemmed from the “offense” they faced from the inquisitorial system. The charges brought by the prosecution stemmed from sworn witness testimony collected prior to the defendant’s arrest. Although these statements were verified, they were not necessarily free of bias as it was not uncommon for witnesses to testify out of spite or hatred for a defendant. It should be noted that while some witnesses came forward on their own accord, others were called by inquisitors. Regardless, all witnesses were asked to provide any information they had regarding a defendant’s supposed heresy. These inquiries could prove doubly beneficial as they often elicited additional damning details against the accused and could provide inquisitors with the names of other adverse witnesses. When inquisitors believed they had collected enough material to begin proceedings, the defendant was arrested and their personal property seized for the duration of the trial.

The seizure of one’s goods provided the first major impetus for the need of a defense: the holding of the defendant’s wealth caused harm to their family who would have been destitute until the trial concluded. Since confession and reconciliation with the church would have resulted in the permanent seizure of one’s goods, many defendants opted to clear their names in order to ensure the livelihood of their families. Also, since defendants were presumed guilty, and confession was the ultimate goal of any inquisition trial, defendants were often forced to contend with an immense amount of pressure to admit to crimes they may not have committed. This meant that the threat of torture often loomed over the heads of many defendants who refused to confess, providing yet another need for solid defense tactics. Lastly, because defendants were not privy to the names of their accusers, some of whom may have testified out of capital enmity, they needed to be
prepared to defend themselves against testimony provided by any number of possible enemies. While these are but three aspects of an inquisitorial "offense," they make clear the reason why defendants needed to be active in the construction of their defensive strategies.

The Inquisition trial of María de Cazalla demonstrates the value of being active in the construction of a defense. Cazalla came to the attention of the Holy Office as a member and eventually a spiritual leader of the *alumbrado* movement. Although never formally educated, she was heavily influenced by her brother, Franciscan friar Juan de Cazalla. It is clear that this relationship allowed Cazalla access to more than just a basic education: through her brother she was exposed to humanist ideas, books prohibited by the *Suprema*, and more importantly, the Bible. It seems that the biblical knowledge gained from her brother contributed to the formation of her religious beliefs, and in some ways, her defense. Given her brother’s prominent standing within the religious community, I believe it is also plausible that she invoked his clerical status before and during her trial to bolster her own. Nevertheless, it was the intelligent and organized nature of her defense that attracted me to Cazalla’s inquisition trial: her flexibility, rhetorical abilities and familiarity with inquisitorial procedure gives the impression of a strong, intelligent woman who could change her defense tactics in order to save herself and defend her beliefs.

Cazalla first appears in Inquisition records in 1525 when she voluntarily responded to the edict of grace against the *alumbrados*. The gap between this initial

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47 Juan de Cazalla was a successful cleric who acted as chaplain to Toledo Archbishop Francisco Ximénez Cisneros, and later was appointed assistant bishop of Ávila.

48 An edict of grace was a document detailing the crimes and heresies that the Holy Office pursued at any given time during its tenure. Once drafted, the edict would be read aloud following Sunday Mass and those
confession and her arrest in 1532 is significant; during that time she had developed a substantial following and in the process created enemies who would later testify against her. Marí Núñez, Francisca Hernández, Pedro Ruiz de Alcaraz, and Diego Hernández—each of whom held a grudge—were among the former friends who testified for the prosecution. By 1532 the Toledo tribunal had collected enough damning information to begin proceedings against Cazalla, and on May 3 she made her first appearance before inquisitors Alonso Mexía and Pedro Vaguer. Thirty-two charges were brought against Cazalla: she was accused of believing the *álumbrado* and Lutheran errors, preaching and instructing *álumbradismo*, and of concealing and defending heretics and those who were in possession of prohibited books. Cazalla’s defense was quite remarkable: her rhetorical style and adaptability displayed an intelligence that allowed her to successfully respond to the various charges against her. Yet perhaps the most impressive aspect of her defense—a matter of character, not strategy—was her steadfastness in the face of adverse evidence and one session of torture. On December 19, 1534, Cazalla heard her sentence: she adjured a light suspicion of heresy, was ordered to pay fifty ducats, and had to perform public penance in Guadalajara. Although additional charges were brought against her on December 22, Cazalla disappears from the historical record following the reading of her sentence.

While Cazalla may have disappeared once she was sentenced, the extant transcript of her trial exposes one of the most important breaches of secrecy in inquisitorial history.

Who felt they may have been guilty were encouraged to come forward and voluntarily confess their crimes. The period of grace in which people had to come forward was generally 30 days. Spaniards tended to respond to such edicts because they were promised lenient sentences for their volunteerism. The edict against the *álumbrados* was issued by Inquisitor General Alonso Manrique in 1525; it detailed 48 propositions against this heretical sect. Hamilton, *Heresy and Mysticism*, 27-29; Homza, *The Spanish Inquisition*, 80-92.

On April 11, 1533 the tribunal’s despensero, Diego Gaspar Martínez, noticed something suspicious about a package of food being delivered to prisoner Bernardino de Tovar: not only was the wrapping unusually white, but letters began to appear when this paper was held up to a candle. When a second suspicious package arrived for Tovar, Martínez reported his discovery to the tribunal’s inquisitors, who proceeded to investigate. An inspection of Tovar’s cell followed and what they discovered was astounding: Tovar had been covertly communicating with his half brother Juan de Vergara, for over three years. Vergara was a member of the ecclesiastical elite, a well-connected Renaissance humanist who had served as secretary to numerous archbishops of Toledo. His connections allowed him to exploit a system of patronage through which he was able to obtain details pertinent to his brother’s inquisition trial. The brothers were able to communicate by writing letters in citrus juice which, once dry, was almost invisible to the naked eye; only when heated did the text reveal itself. The deceptive nature of this correspondence infuriated the inquisitors who immediately had Vergara arrested and began in inquest to discover the depths of this deception.

As Inquisitors Mexía and Vaguer conducted their investigation, they discovered that Tovar had relayed the information provided by his brother, as well as legal advice, to his alumbrado contacts that were also being held in the Toledo tribunal. They, in turn, had responded to him. The inquisitors, with a tip from an inmate’s servant, soon began to suspect that the content of the letters between Tovar and Cazalla contained more than

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50 For the full narrative of these events see Homza, Religious Authority, 17-22.
51 These messages were relayed via Tovar’s servant, Diego de Aguilar, who was frequently able to roam the grounds through requests for exercise. María de Cazalla’s servant, Isabel Díaz, relayed messages to Tovar when Aguilar was unable to.
words of "consolation and fortitude." All of the prisoners were asked "if they knew whether some statements or writings or letters or messages had been sent from one cell to another and whether some prisoners had been speaking with others, sending messages or other things." Their interview with Diego Hernández proved the most telling: on All Saints Day 1532, Cazalla’s servant had accidentally delivered a bundle of letters intended for Tovar to Hernández. When Hernández inspected the letters, he discovered that they contained information relating to the publication of witnesses in Cazalla’s case. Upon hearing this, the inquisitors dismissed Hernández and brought Cazalla in to be questioned.

In this audience Cazalla was asked "if since she had been in the prison of the Holy Office she knew or had heard that someone or some people had given letters or advice, or had spoken or taken things to other cells or to other prisoners." She replied that although she had not spoken with another female prisoner, she had received a letter from bachiller Bernardino de Tovar. She was not sure when the letter was received, only that it was delivered before her lawyer responded to the accusations. Cazalla admitted that she had responded to Tovar’s letter and that this response had not been delivered because her servant had dropped the letter in Diego Hernández’s cell in error. The phrasing of the inquisitors’ question must have told her that they were aware of her

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52 Ortega-Costa, Proceso contra María de Cazalla, 480. Diego de Aguilar testified on May 9, 1533 that he read the letters and that they contained words of "consolándola y esforzándola."
53 Ortega-Costa, Proceso contra María de Cazalla, 481. "Fue preguntado que si sabe este declar[ante] que algunas testificaciones o escrit[uras] ayans enbiado de una cárcel a otra o cartas o mensajes e que unos presos ayan hablado con otros e enbiádose mensajerías o otras cosas alg[un]as."
54 Ortega-Costa, Proceso contra María de Cazalla, 481-485. Diego Hernández’s interview took place on May 14, 1533.
56 The term bachiller translates to 'secondary graduate' or someone who had graduated from college.
57 Cazalla knew that her first letter had not been delivered because Tovar, in a subsequent letter, advised that he had not received her initial response as it had been thrown into Diego Hernández’s cell.
communication with Tovar. Yet she was not sure how much they knew. This explains why she answered only the questions asked, providing just enough non-incriminating detail to make it seem as though she were making a confession. She provided no additional information; doing so would have deprived her of deniability. She was more than willing to confess to the actions of which her inquisitors were already aware, but she was not going to incriminate herself or Tovar in the process of this investigation. The inquisitors ended the interview at this point and asked that Cazalla be returned to her cell.

On May 16 Cazalla was called before the inquisitors who asked a series of questions regarding the content of her correspondence with Tovar. The objective of this line of questioning was to determine how much information Cazalla had provided to Tovar about her case, and whether or not Tovar had assisted her by providing his advice. The inquisitors asked “if she had advised Tovar when she wrote to him that she had responded to the accusation, or if she had advised whether she had confessed or denied the charges.”58 Her response was quite clever: “she said that she doesn’t remember, and that if she had written something it would be that she had confessed or denied, confessing to the truth and denying the opposite.”59 The simplicity of this response is impressive. Of course she claims not to remember, because she cannot get into any more trouble for the things she is unable to recall. Yet she advises that she would only confess to those things that were true while she would deny all falsities. I would argue that this statement was a faint attempt to bolster her credibility; she wanted her inquisitors to see that she

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58 Ortega-Costa, Proceso contra María de Cazalla, 488. “Preguntado que sy aviso esta declar[ant]e al dicho Tovar quando le escribió que avía respondido a su acusación, sy esta declar[ant]e le escribió sy la avía confesado o negado.”

59 Ortega-Costa, Proceso contra María de Cazalla, 488. “Dixo que no de acuerda e que sy algo le escribió, sería dezir lo que esta declar[ant]e avía confesado o negado, confesando la verdad y negando lo contrario.”
was willing to confess when she knew she had done something wrong, but would deny those things that were simply not true.

The investigation into the covert communication between prisoners in the Toledo tribunal reveals that defendants could, and did, take their defense into their own hands. The trial of María de Cazalla implies that Bernardino de Tovar had intended to advise Cazalla in the construction of her defense: he had requested a copy of the prosecutor’s publication of witnesses in order to offer his advice. Since Cazalla maintained her composure throughout the investigation she offered no additional information that would reveal whether or not she and Tovar had ever been successful in their covert communication. Her ability to decipher what the inquisitors already knew and to confess only to those errors demonstrates intelligence and flexibility: had she maintained an “I don’t remember” defense throughout this whole ordeal, she might have been forced to suffer more than one session of torture. Although we will never know whether Tovar was successful in his endeavor to advise Cazalla on her defense, the fact that they even tried is revealing. It seems safe to speculate that if these two were scheming to fashion their defense, other inquisition defendants were as well.

The variety and seriousness of the charges leveled against María de Cazalla provides one possible explanation as to why she may have sought the council of others. The adverse testimony began in February 1525, prior to her confession in response to the edict against the alumbrados. In the seven years between this initial testimony and her arrest, the Toledo tribunal collected statements from nineteen witnesses resulting in thirty-two charges. Cazalla was accused of believing and practicing Lutheranism and alumbradismo, with little distinction being made between the two; with condemning

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60 Ortega-Costa, Proceso contra María de Cazalla, 488.
exterior religious acts including, but not limited to, the sacraments, confession, and fasting; of mocking religious ceremonies, clerics, and believers for not seeking God in themselves; of challenging Catholic authorities and revering *alumbrados* Isabel de la Cruz and Pedro Ruiz de Alcaraz in their place; and lastly of teaching and preaching in public which was considered scandalous. Given the detailed nature of the charges, Cazalla’s sophisticated defensive strategies seem an appropriate response.

Throughout her trial María de Cazalla displayed an astounding attention to rhetorical detail. Not only was Cazalla able to make intelligent rhetorical decisions, she displayed a changeability that allowed her to maneuver around a good number of adverse charges. This mastery of language and flexibility were two of the most impressive aspects of Cazalla’s defense. She would often deny certain charges while admitting to slightly different, though correct, beliefs. This tactic gives the impression that she was aware of what her inquisitors wanted to hear.61 One of the first accusations against her charged that she would only go to Mass and receive the sacrament of penance to comply with the law. She responded by saying that she did not remember having said such a thing. She did remember having said that people should look for God in living temples, yet she did not deny that God was in the temples or His sacraments or that people should seek him in material temples.62 Rather than respond to the accusation directly, Cazalla

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61 Ortega-Costa, *Proceso contra María de Cazalla*, 99-101. Cazalla had previously appeared before the Holy Office in 1525 in response to the edict against the *alumbrados*. At that time she confessed to having pride in bringing people into the service of Christ, to illicit movements of the soul, and of counseling clerics and laymen to serve God because he deserves such service, not out of fear. It seems reasonable to conclude that this first encounter with the Inquisition proved valuable in her later defense: it allowed her some familiarity with inquisitorial procedure and taught her how to finesse inquisitors with her changeability.

62 Ortega-Costa, *Proceso contra María de Cazalla*, 106. “Dixo que no se acuerda esta declar[ant]e aver dicho que no recibiría el sacramento ni se confesaría ni oyría misa syno por cunplir con el mundo, mas que se acuerda algunas vezes aver dicho esta declar[ant]e que buscásemos a Dios en los tenplos bivos mas no
attempted to clarify what she had previously said. Although she did not remember having said that she would only receive penance and go to Mass because of the law, she did remember having made other related statements. This was a brilliant rhetorical move on her part: by directing attention away from a statement that she did not remember making she could counter it by stating that she also held the correct belief, namely in the sacraments and use of material temples. It was a subtle, but effective, defense strategy.

In yet another display of rhetorical prowess, Cazalla demonstrated an ability to manipulate prosecution charges and witness statements to her advantage. In response to the second charge, that she did not believe that God was in the Eucharist, she stated:

I remember many times saying ‘Oh Lord, what ignorance is this that people seek You in temples of stone and don’t seek You in living temples, conforming to what Christ says that ‘the kingdom of God that you seek is inside you.’ I do not remember there being a time when I thought the religious orders of the church were bad. What I did say is that we should look in all times and all places so that we might properly find Him in the temples and in the sacraments, and my words were probably in error, but this is what I intended and what I remember having said.\(^6\)

Cazalla responded with a multi-faceted approach to her defense. She began by arguing that she was previously misquoted; she quickly corrected her previous statement and proceeded to cite scripture in her defense. In this instance the line ‘the kingdom of God that you seek is inside you,’ although incorrectly quoted, does demonstrate her familiarity with scripture.\(^6\) By inserting this quotation into her testimony, she was able to justify

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\(^6\) Here Cazalla has misquoted Luke 17:21 which reads, “the kingdom of God is within you.”
her previous statement that people should seek God in living temples as well as in material ones. This whole line of defense would not have been successful without her insertion of the scriptural citation, which added credibility to a seemingly heretical statement. Cazalla’s rhetorical abilities allowed her to display a familiarity with scripture while employing the prosecution’s charges as part of her defense.

The impressiveness of María de Cazalla’s rhetorical efforts seems to indicate that she believed herself, and her beliefs, to be nothing less than honorable. In the sixteenth century, few ideas guided the conduct of the Spanish populace more than the preservation of honor. The concept of honor in the Spanish context has recently undergone significant changes: where it was once appropriate to relate honor to the sexual purity of women, scholars now recognize that honor encompassed many more values, including credit and debit relationships, the protection of family, and competency in one’s job or trade. These were aspects of one’s public life that were recognized and scrutinized, and, when necessary, defended to the death. It was the need to defend one’s honor that led to violence or litigation against those who had slandered their good name. Because of this shift in the definition of honor, it is no longer appropriate to think of it as a rigid code of behavior that regulated the actions of the Spanish people, but rather as a rhetorical ploy that was available to anyone who chose to use it. Recent scholarship points to the rhetoric of honor, which was the invocation of honor as a defense strategy, as one of many strategies available to Spaniards who pursued disputes against their neighbors.65 This rhetoric was available to both men and women who could employ it equally when defending their individual honor or that of their family. To call upon honor as a defense

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strategy was a choice, not a given, and it seems that both María de Cazalla and Antonio de Medrano opted to exploit the rhetoric of honor in their inquisition trials.

Cazalla seems to have utilized the rhetoric of honor to defend her beliefs, and her status as a true Christian. Unlike Antonio de Medrano, Cazalla’s parents were of *converso* origin, which meant she had to work that much harder to establish her honor and Christianity in the eyes of her inquisitors. To do so she pursued three related strategies. She first downplayed the depths of her *converso* ancestry by claiming not to have any memory of her ancestors’ experiences with the Inquisition, and by listing family members who were not touched by the Holy Office.\(^6^6\) In doing so she was attempting to create distance between their beliefs and her own. Next she employed her rhetorical prowess to demonstrate the ways she had been misquoted or misunderstood by those who testified against her. I believe she did this not only to defend her religious ideas and practices, but also because she felt it honorable to do so. Yet perhaps a more effective method of establishing one’s adherence to Christianity was through the *abonos* process.

*Abonos* were questions asked of character witnesses for the defense; they were usually meant to establish a defendant’s adherence to Church rites and doctrine.\(^6^7\) Witnesses were able to provide answers to these questions based on their familiarity with the defendant and the defendant’s public reputation, or *fama*. The medieval concept of *fama* was defined as “public opinion, idle talk, rumor, and reputation as well as fame; both a good name and a bad one were called *fama*; and while *fama* denoted information

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\(^6^6\) Ortega-Costa, *Proceso contra María de Cazalla*, 101-102. “...no le tocó Ynq[iusiçi]on...”

\(^6^7\) This process provided the opportunity for an important defense tactic because *abonos* could be doubly beneficial: not only did favorable testimony bolster the defense, if the defendant called people of prominent social standing, such as church officials or those who enjoyed royal favor, the testimony was often given more weight.
or news, at the same time it meant the image formed of a person by that information.”

Simply put, *fama* was the common knowledge – good or bad – about any given person in medieval and early modern society. None of this is to suggest that *fama* was fixed, since it could, and often did, evolve based on public acts such as one’s profession or their marriage. Medieval and early modern people also understood that their outwards acts – dress, possessions, behavior, etc. – would be discussed and evaluated among their neighbors. This explains why, by virtue of its public nature, *fama* became a useful element in medieval jurisprudence. The value of such knowledge was fairly obvious: the *fama* about an event or person could have been used to reinforce eyewitness testimony.

Although hearsay of this sort was not officially sanctioned in Spanish Inquisition trials, there was nothing to prevent a witness from testifying based on the *fama* of an accused heretic. Conversely, inquisition defendants could exploit the *fama* of adverse witnesses and utilize their own *fama* as a means of defense – tactics employed by Marfa de Cazalla and Antonio de Medrano.

In her *abonos*, Cazalla asked witnesses “if they know, believe, have seen or have heard it said that in the last twenty years until now the witnesses have known Marfa de Cazalla to live as a good, faithful, and Catholic Christian, doing the works as such.”

The wording of the question indicates that she was relying not only on first-hand knowledge of her Christianity, but also on her public reputation as a good Christian.

Since the majority of witnesses called on her behalf testified that they knew her to be a

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69 Ortega-Costa, *Proceso contra María de Cazalla*, 269. “Yten sy saben, crehen, vieron, oyeron dezir que de uno e doss e tres e diez e veynte ayes a este parte e desde que los tjestigos conoçen a la dicha María de Caçalla, la an visto bivir como buena, fiel y católica christianà, haziendo obras de tal.” Cazalla posed twenty-nine questions to be asked for thirty-six witnesses.
good Christian woman, it seems her *bona fama* was intact. This would have strengthened her position as a woman of honor and as someone who adhered to the dictates of the Church. Cazalla’s ability to exploit the rhetoric of honor and her own *fama* had to have bolstered her credibility while dismantling the prosecutions’ assertion that she held heretical beliefs.

The preservation of honor was also important to Antonio de Medrano. Medrano, perhaps one of the more colorful characters in inquisition history, was an educated cleric who survived three encounters with the Inquisition. He first came to my attention through Mary E. Giles’s study of Francisca Hernández; they seemed to share an unusually close relationship that piqued my curiosity. The two met in 1517 while Medrano was completing his education at the University of Salamanca, a meeting that changed the whole course of his life. The nature of their relationship, later confirmed to be erotic though not sexual, struck me as out of the ordinary: his attraction to Hernández, and anything erotic that resulted, seemed to contradict his position as a practicing cleric. Moreover, he did not seem to be interested in the consequences of his actions with Hernández: he had been banned from seeing her by the Valladolid tribunal in 1519 yet continued to do so despite repeated warnings, and he also believed her brand of holiness

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70 In 1519 he appeared before the Valladolid tribunal, though no charges were brought against him. His first official trial took place in Logroño in 1526, and his second was in Toledo in 1530.
71 Mary E. Giles, “Francisca Heanández and the Sexuality of Religious dissent,” *Women in the Inquisition: Spain and the New World* ed. Mary E. Giles, (Baltimore: The Johns Hopkins University Press, 1999), 75-97. Hernández was one of the three female leaders of the *alumbrado* movement; she enjoyed a reputation as a spiritual healer and advisor. She was rumored not only to have the ability to heal, but also to interpret Sacred Scripture and rid priests of their sexual temptations. Her gifts attracted the attention of many male followers including Francisco Ortiz, Bernardino de Tovar, and Medrano – all *alumbrados*. Eventually she fell under the suspicion of the Holy Office and was brought in for questioning. The testimony she provided was damning for a number of fellow *alumbrados* including María de Cazalla and Antonio de Medrano.
to be more powerful than most. While many scholars have focused on Medrano and his relationship with Hernández, I believe his inquisition transcripts can also reveal a great deal about the defense mechanisms available to inquisition defendants, and the way defendants interacted with their inquisitors.

For the purposes of the current project I am interested in the ways in which Medrano exploited his status as a cleric and sixteenth century ideas of false sanctity as part of his defense. I have chosen to focus on his 1526 trial in Logroño because the defense mechanisms developed throughout this trial are fascinating. Medrano was charged with, among other heretical statements, supposing that God had revealed many divine secrets to him; going to fields to communicate with the Holy Spirit; claiming that he was capable of feeling more than anyone “the things of God;” and lastly for the inappropriate ways in which he conducted himself with his female disciples. His defense against these charges was multi-dimensional: he implied that the witnesses against him were a mockery and should be the ones imprisoned, that as a cleric his testimony should be valued over any other witness, and that women were vain, weak, and not to be trusted. A basic knowledge of inquisitorial procedure appeared throughout his defense, through which he was able to discredit some of the witnesses against him and defend himself. On June 4, 1527 Medrano regained his freedom: he abjured a light suspicion of heresy, was sentenced to pay 100 ducats, was banned from seeing Francisca Hernández, and was allowed only to give the Eucharist to adults of legitimate age. Unfortunately his freedom was short lived: in 1530 he was remanded to the Toledo

75 Escohotado, Proceso contra Antonio de Medrano, 16.
tribunal where he faced charges regarding this relationship with Hernández and other supposed spiritual errors.

Medrano’s Logroño trial opens with the testimony of Juana and Isabel López, sisters who seem to have shared a close spiritual relationship with the accused. Their statements, coupled with the content of three letters Medrano had written to the sisters, led the Logroño tribunal to open official proceedings. Between February 10, 1526 and December 13, 1526 sixteen witnesses came forward to comment on Medrano’s supposed heresy. This testimony resulted in twelve charges, the majority of which questioned his methods of indoctrination, his supposed alumbrado beliefs, and his unusually close relationships with women and those with “simple” minds. The tribunal seemed to be particularly concerned that he was passing his alumbrado beliefs on to those he indoctrinated, and his competency as a cleric.

Medrano’s supposed alumbradismo was clearly of concern to the Logroño tribunal, as ten of the twelve charges against him contained propositions that smacked of this heresy. Given the tenets of alumbradismo – internal spirituality, illumination through a direct connection with God and contempt for the external ceremonies of the Church – and Medrano’s penchant for women and people with simple minds, the Logroño inquisitors were especially concerned with Medrano’s methods of instruction and practice with these new disciples. The fourth charge presumed that Medrano “made women and simple people believe that he did not live in himself, but lived in God and consented that they kiss his feet and wherever he stepped as if he was a divine thing or
This was a rather serious charge as it implied that Medrano believed himself to be some sort of spiritual master, which went against the teachings of the Church. His defense against such a charge was three-fold. He first attempted to justify his actions by referencing the Bible, "he said when he said that he does not live in himself, but in God, that this is what the Gospel admonishes, that we live in Christ and we are transformed in Him." Since the **alumbrados** were reasonably familiar with scripture, Medrano was able to allude to a scriptural passage that supported his actions. He then denied having asked anyone to kiss his feet while identifying the person who provided this information to the tribunal: "and the charge of kissing the foot, he does not remember such a thing, rather the wife of Martin Pérez [Juana López], resident of Logroño, said to this defendant that she had such observance and reverence for him that she only wanted to kiss his feet." Rather than explain his actions Medrano suggested that this woman was so overzealous in her spirituality that he had to tell her that it was inappropriate for her to revere him in such a way. By deflecting the blame for this situation away from himself and on to Juana, Medrano was able to give the impression that he recognized improper religious practices and attempted to correct them, just as any good cleric would have done. In this way he was able to justify his actions while coming across as a true Catholic.

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76 Escohotado, *Proceso contra Antonio de Medrano*, 50, "...dava a entender a las mugeres y a las personas simples que él no vivía en él, sino que vivía en Dios y consintió que le besasen el pie y donde pisava como si fuera cosa divina o Summo Pontifice..."

77 Escohotado, *Proceso contra Antonio de Medrano*, 52, "dixo que quanto a lo que dize que él no bevya en sí, sino en Dios, que aquello es lo que le amonesta el Evangelio para que bivamos en Christo y seamos transformados en El..."

78 Escohotado, *Proceso contra Antonio de Medrano*, 52. "y en lo de besar el pie, que él no se acuerda de tal cosa, antes la muger de Martín Pérez, vezino de Logroño, le dezía a este q[onfesan]te que ella le tenía tante acatami[en[to y reverencia que no quisiera sino besalle los pies."
Also alarming to inquisitors were allegations that Medrano did not believe in the sacrament of communion and that he had made a mockery of this rite. While anyone could have been charged with heresy for such an action, it had to have been especially troubling that an educated cleric had acted in such a way. He was charged with:

eating wine soups and giving them to some people in order to bring them to his opinion, after eating those soups, he was heard to say to them: "What do you seem to feel? Does it not seem as when you receive the sacrament?" Whence it is inferred either that the defendant has a wicked opinion about the Holy Sacrament, believing that its flavor consists of physical and not spiritual taste, or so that such persons would receive those wine soups from his hand as if they equaled in virtue the consecrated Host, wherein lies the true body of God whose divine majesty was offended with [this] large blasphemy.  

There are two related allegations in this passage: the first accused him of improper indoctrination, particularly in the reception of the Host, the second claimed that he did not believe in the Holy Sacrament. It seems that the evidence that led to this accusation made the tribunal question Medrano’s Catholicism by labeling him a blasphemer. I do not believe that Medrano would have taken this indictment lightly. He flatly denied the charge, saying “if he had said some thing that would be how in all things we should look to God; and thus God is used to consoling him in his food and drink more than his mercy, by his total kindness; [and] with that desire he desired that all should be consoled by food and drink and in all the other things.”

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79 Escohotado, Proceso contra Antonio de Medrano, 50. “...comiendo sopas en vino y dando d'ellas a algunas personas por más las atraer a su opinión, después de aver comido aquellas sopas, fue oyo dezir que les dezía y dixo: "¿Qué hos paresce que sentís? ¿No hos paresce como cuando recebís el Sacramento?" De donde se infiere que o el dicho bachiller siente mal del Santo Sacramento, creyendo que su sabor consiste en el gusto corporal y no espiritual, o que por receibir aquellas personas las sopas en vino de su mano, que yugalava se virtut a la ostia consagrada, adonde está el verdadero cuerpo de Dios cuya divina magestat con grande blasphemía ofendió...”

80 Escohotado, Proceso contra Antonio de Medrano, 52. “dixo que la niega y que si alguna cosa dixo que sería que cómo en todas las cosas hemos de buscar a Dios; y así Dios le suele consolar en su comer e bever más que él merescía, por su suma bondad; [e] con aquel deseo deseava que todos fuesen consolados en el comer y bever y en todas/las otras cosas.”
surprising that he did not offer any real explanation for his actions. Instead he claimed that in all of his actions he looked to God, and since God made him feel better through food and drink, Medrano thought he would share that experience with his companions. While this was a reasonable explanation, it was not enough to convince inquisitors of his Catholicism or that he knew proper from improper Church procedure. In order to prevail in these proceedings Medrano was going to have to explain his actions and demonstrate his adherence to appropriate Catholic practices.

As a cleric, Medrano had at his disposal a rhetorical style that María de Cazalla could not exploit. It seems that his mode of persuasion was to attempt to relate to his inquisitors in ways that a good number defendants could not: as an educated cleric he could invoke ecclesiastical status and theological knowledge as needed to serve his purposes. Medrano’s adoption of this schema is thought provoking as it reveals how clever he really was. In one instance, a local priest testified that he had heard of Medrano traveling with much ostentation to a pasture where he was witnessed communicating with the Holy Spirit – a charge that smacked of alumbradismo. In order to discredit this witness Medrano stated, “this is all a mockery and your Reverence [Inquisitor] should have punished those people and he [Medrano] should be given his freedom.” This statement not only criticizes the tribunal for believing a layman over a cleric, but also created an us versus them dichotomy: he attempted to bolster his credibility by allying himself with his inquisitors while diminishing the reliability of this adverse witness. Medrano offered no proof for his assertion that the witness’s statement was a mockery. Nevertheless, I imagine his confidence drove him to make such a claim. It seems that he

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81 Escohotado, Proceso contra Antonio de Medrano, 67.
82 Escohotado, Proceso contra Antonio de Medrano, 72. “...que es burlería todo y que su Revrencia avía de castigar aquellas personas y a este confesante darle por libre.”
presumed his Inquisitors would find him, a cleric, more believable than any person who testified against him. In this way Medrano was attempting to establish some sort of dialogue with his inquisitors, based on their shared profession, in the hopes that they would give him the credibility he felt he deserved.

Medrano was not the only ecclesiastic to invoke clerical status as a means of lending credibility to his defense statements. Juan de Vergara and Francisco Ortíz, both respected members of the ecclesiastical community, stressed the importance of status as part of their defense. Vergara was arrested by the Inquisition in 1533 for the content of the clandestine communication he had maintained with his brother, Bernardino de Tovar, who was being held by the Holy Office. As an exceptionally talented intellectual, Vergara "mentioned his position and his education to justify his actions: he saw himself as part of the religious and academic elite, and possessed a sharp sense of his place over and against the rest of Spanish society."83 Ortíz was apprehended on April 6, 1529 for the content of a sermon in which he stated that Inquisitor-General Alonso de Manrique committed a sin by having Francisca Hernández arrested. While imprisoned he repeatedly reminded Manrique that he had once been praised by the Inquisitor-General and wondered how he (Manrique) could believe those who spoke against him (Ortíz), when Manrique had held him in such high regard.84 The issue here was credibility: these three clerics could not understand that another person's testimony could be considered more reliable than their own. In citing clerical status as part of their defense, Vergara, Ortíz and Medrano were attempting to relate to their inquisitors in a way few could.

83 Homza, Religious Authority, 36.
Aside from invoking ecclesiastical status, Medrano attempted to deflect blame for his actions. When charged with making inappropriate comments in the presence of female penitents, he responded by saying that “the business about the confessions and the temptation, that this is true and he has scolded himself because it is bad for women to be so close to the clerics and that God has removed the temptation from him.” While it is significant that Medrano admitted to the charge — something I would not have expected given his excessive confidence — it is more telling that he did not accept full responsibility for his actions: he inserted a quick line placing blame on the proximity of clerics and confessants during confession, arguing that women should not be allowed to be too close to men. This statement mirrors the ways in which Cazalla would make partial admissions as part of her defense. In this instance Medrano admitted to the charge in order to direct his inquisitors’ attention to the need for Church reform: if the church were to reform the way men and women interact, he would not have been close to these women and therefore would not have been charged with making this or any other inappropriate comment.

Another layer is added to this statement when we consider Medrano’s reputation when it came to women. In championing the separation of men and women in Catholic rituals, I believe he was attempting to bolster his credibility by arguing that he would be just as effective a cleric with or without the presence of women; they were of little to no consequence when it came to his clerical abilities. The charges against him, coupled with his reputed sexual relationship with Francisca Hernández, must have given his inquisitors the impression that he was in some ways enthralled with his female followers. This line

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85 Escohotado, Proceso contra Antonio de Medrano, 72. “dijo que en lo de los confesonarios y de la tentación, que es es verdad que él lo reprendía, porque le parecía mal estar las mugeres tan junto a los clérigos y que la tentación Dios se la á quitado a este confesante.”
of defense worked to combat such assumptions. Although this was certainly an unusual way to gain favor in the eyes of his inquisitors, Medrano needed them to understand that he was not only credible, but more than capable of fulfilling his ecclesiastic duties.

Contributing to Medrano’s idea of himself as a credible individual was the sense of honor he felt as an Old Christian and a member of the clergy. The constant invocations of his clerical status and the stress he placed on his Old Christian lineage seem to indicate that he associated honor with social status. When providing his genealogy to the Logroño tribunal he stated “that on the part of his father he is an *hidalgo* and for this he is glad; and on the part of his mother, a gentleman; and that he is Christian and a priest.”86 The claim that his parents were of substantial social status coupled with the insertion that he was a Christian and priest were meant to imply his honor via his *bona fama*. The status allowed him by his lineage and profession appears to have manifested itself in an exaggerated amount of pride in his position in life. I say exaggerated because the records of Medrano’s inquisition trials cast a shadow of doubt on his honorable character. Perhaps this explains why he employed the rhetoric of honor so frequently throughout his ordeals with the Inquisition. The fact that he was facing the Inquisition meant that his *fama* was already in jeopardy. In order to prevent any further scarring to his reputation, Medrano would need to establish his position not only as a good Christian, but as a proficient cleric.

For many inquisition defendants, a basic familiarity with legal procedure provided one of the most traditional, yet effective defense strategies available. The trials of María de Cazalla and Antonio de Medrano demonstrate the ways in which the law could be

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86 Escohotado, *Proceso contra Antonio de Medrano*, 51. “...de parte de su padre es fijodalgo e por tales gozan; y de la parte de la madre, cavall[er]o; y que es christiano y sacerdote...”
exploited masterfully. Although labeling this type of defense as traditional may seem to
detract from how innovative it really was, these two were not the first defendants to
exploit the prevailing legal culture to their advantage. Beginning in the medieval and
continuing into the early modern period, a general awareness of the law was public
knowledge: “The legal culture of publicity in late medieval Europe rested on the simple
understanding that all facts worth knowing, especially legal facts, were public facts:
known everywhere, at all times, and by all.”87 I would argue that these facts not only
included specific information about people and events, such as weddings and births, but
also facts about the law.88 This explains how both plaintiffs and defendants were able to
express their legal acumen: plaintiffs utilized the system to publicly shame or humiliate
their enemies, to defend their honor, and to display their social rank while defendants
could argue capital enmity and, in some cases, turn the defense back onto their
accusers.89 It seems then that a fair percentage of the population in the sixteenth century
had a basic understanding of the law which they could develop to their advantage.

María de Cazalla’s familiarity with inquisitorial procedure and legal culture
formed one of the more effective aspects of her defense. She was able to exploit these
principles to her advantage in two ways. First, by recognizing that the testimony
provided by certain adverse witnesses was incomplete: this error allowed her to submit

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87 Smail, *The Consumption of Justice*, 211. Smail posits that legal facts include those events that were
witnessed by the public: deaths, business transactions, and lawsuits, for example, would all be included.
88 See nos. 35-38 above, and Kenneth Pennington, *The Prince and the Law, 1200-1600: Sovereignty and
Rights in the Western Legal Tradition*, (Berkeley and Los Angeles: University of California Press, 1993);
Emma Hawkes, “[S]he will...protect and defend her rights boldly by law and reason...”: Women’s
knowledge of Common Law and Equity Courts in Late-Medieval England,” in *Medieval Women and the
62-90. Hyams explores the ways in which Roman legal ideas infiltrated the medieval world.
89 Smail, *The Consumption of Justice*, 23 and 218. Smail points out that in denying the facts of a case the
defendant made their accuser have to prove said facts.
repeated petitions to the prosecutor for additional information, probably in the hopes that the prosecution would divulge enough detail to lead to the identification of adverse witnesses. She was also successful in her attempts to identify and discredit witnesses she knew to be capital enemies. Although defense attorneys and their clients had no private contact with one another at any point during the trial, it seems clear that Cazalla’s attorney played a crucial role in this aspect of her defense. It was her attorney, after all, who presented her numerous petitions for additional information to the inquisitors presiding over this trial. Nevertheless, the strength and courage Cazalla displayed while facing her inquisitors reveal her personal familiarity with inquisitorial procedure. Whether she gained this knowledge from her communication with Tovar or her attorney is unclear; however she obtained this expertise, it worked to her benefit.

I believe it is safe to assume that the majority of inquisition defendants were not aware that the filing of petitions could be utilized as a defense strategy. Yet María de Cazalla knew, perhaps from the advice of her attorney, that she had the right to ask for additional details in order to properly defend herself. Inquisitorial practice dictated that defendants were to provide immediate oral responses, and later written responses, to the publication of witness testimony. On October 17, 1532 Cazalla was presented with the testimony of all nineteen witnesses to which she provided her oral responses. Three days later, on December 20, Cazalla submitted her first petition to Inquisitor Vaguer. This petition, which doubled as her written response, asked for information from various

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90 Inquisitorial procedure dictated that defense attorneys were to be appointed when requested by defendants. These attorneys, who were attached to individual tribunals, were not permitted any private communication with their clients: all meetings were to be conducted in the presence of at least one inquisitor and a notary. They were asked to work within the existing law codes to assist in the formation of a defense. If a particular case lacked justice these attorneys were instructed to notify inquisitors and were no longer able to act on the part of the defendant.
witnesses to clarify the date, time, or location of the charges against her. She advised “until I have been given a copy and transcript of all the aforesaid, and every thing and part of it, there should be no time limit to make my case. I beg and plead Your Reverences to give all of this to me quickly, because with it I can respond.”91 Telling her inquisitors that she wanted this information quickly was a clever move on her part: while she was implying that she did not want her trial to be delayed, the petitions process would have prevented a speedy conclusion. In delaying her trial in this way, Cazalla was given extra time to figure out who had testified against her. She was also making the point that the charges were incomplete until the additional details were provided; therefore the defense should be given more time as they could not respond to insufficient information. This line of defense makes sense: it would have been difficult to provide specifics in her defense without knowing when and where these offenses had occurred. Her inquisitors would not respond to this request.

Cazalla waited 26 days before submitting two more petitions for additional information on January 15, 1533. The first reiterated her December 20 request, and reminded her inquisitors that without this information she would be helpless to defend herself.92 The second petition, while also requesting additional details from specific witnesses, added another inquiry. Cazalla also wanted to know “if the witnesses against me have been ratified or which have been and which have not, and if those who have not can be ratified.”93 This was shrewd request on her part. At some point she had been

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91 Ortega-Costa, Proceso contra María de Cazalla, 183. “hasta tanto que me sea dado copia e traslado de todo lo susodicho e de cada cosa e parte dello que no me corra térmi[n]o para alegar de mi justicia. Lo qual todo pido e suplico de Vras. Mds. que me quieran dar con brevedad porque con ella yo responda…”

92 Ortega-Costa, Proceso contra María de Cazalla, 184-185.

93 Ortega-Costa, Proceso contra María de Cazalla, 185. “si los testigos que contra mí depusieron si están ratificados o quáles dellos lo están o quáles no, e sy se pueden ratificar los que no lo están.”
made aware that all witness testimony had to be ratified in order to be included in the charges against her. I believe that Cazalla was hoping to catch her inquisitors off-guard by demonstrating a familiarity with the law and inquisitorial procedure – they could not have expected to be asked for proof that these witnesses had been ratified. Given the notes in the margin of her transcript it seems that not all of the witnesses had been ratified, but that all of them could and would be in the near future.94 She had won this round: her inquisitors would have to complete the ratification of all witnesses before her trial could proceed. Cazalla’s petitions for additional information may have been a stalling tactic, but it also formed part of her defense: while the tribunal pieced together the information she requested, she had additional time to figure out who had testified against her.

Cazalla’s proficiency in manipulating inquisitorial procedure to her advantage was also demonstrated in the way she was able to disqualify adverse witnesses. She was aware that the testimony of only one witness was considered partial proof; two eyewitnesses had to corroborate the same crime in order for a defendant to be convicted.95 Therefore she called for the rejection of certain witnesses since, “they are alone and singular, varied and inconsistent, confused, contrary to one another and contrary in themselves…”96 This tactic worked to discredit the prosecution’s witnesses in two ways: not only was each alone in their testimony to specific crimes, but statements

94 Ortega-Costa, Proceso contra María de Cazalla, 193. She notes that the marginalia was completed by Agustín Yllán (n. 14) “Que los que están ratificados se le an dado e ... ratificando se le darán e que todos se pueden ratificar.”
95 Homza, Religious Authority, 22.
96 Ortega-Costa, Proceso contra María de Cazalla, 198. “son solos e syngulares, varios y yncostant[e]s, confusos, contrarios unos de otros y contrarios en sí mismos...”
provided were not to be seen as credible because they ran contrary to one another.97 Cazalla’s logic here is masterful: how could her inquisitors take seriously witness testimony that contradicted the testimony provided by other adverse witnesses? She followed this statement by saying that the witnesses “depose with hate and vain belief and give no reason for what they have said, and also because they depose with hate and enmity and the bad will they have for me.”98 Roman law dictated that witness testimony provided by capital enemies or out of hatred could not be considered, a practice that continued in Spanish Inquisition trials. Therefore, in pointing out that the adverse witnesses bore her ill will, Cazalla worked to reject witness testimony on these grounds.

Accusations of capital enmity were only successful if the defendant could positively identify the adverse witness – no easy task considering the inquisition’s emphasis on secrecy. When Cazalla received her copy of the accusations and publication of witnesses, any information that would have identified the witnesses against her was removed. This meant that she had to guess the identity of these witnesses based on the available content of their testimony, which is why she petitioned for more details and, by extension, more time. Once she was able to positively identify the witnesses against her, her accusation of personal enmity began to carry more weight. Perhaps the most effective example of Cazalla’s attempt to discredit witness testimony lay in her statements against Francisca Hernández.

97 Cazalla was not the only defendant to argue for the dismissal of contradictory testimony. Fray Francisco Ortiz did the same in his trial. See Homza, “How to Harrass an Inquisitor General,” 326.
98 Ortega-Costa, Proceso contra Maria de Cazalla, 198. “deponen de oydas o de vanas crehencias ni dan razones de sus dichos, lo otro porque deponen con odio y enemistad y mala voluntad que me tienen…”
Almost immediately Cazalla was able to recognize Hernández as an adverse witness based on “her manner of deposing.” Cazalla began to discredit Hernández’s testimony on a number of grounds. First, she wanted to establish that Hernández bore her ill will by pointing out that “[Hernández] is very bad with me because she heard said that I was on poor terms with her tendencies,” and that, “she has ill will towards me because she believed that my brother, the Bishop, was on poor terms with her.” She then began a character attack by stating that Francisca “is a person of suspicious faith, very talkative and that she has been taken many times in lies and falsehoods against other people.” Rather than disqualify her testimony based on capital enmity alone, Cazalla wanted her inquisitors to be aware of how deceitful a character Hernández really was. It was not enough for Cazalla to have Hernández disqualified as a witness, she wanted to smear Hernández’s reputation in order to demonstrate her own good character. If she could convince Inquisitors Vaguer and Mexía that Hernández was not the pious woman she claimed to be, Cazalla could then portray herself as Hernández’s antithesis and gain credibility in the eyes of her inquisitors. In many ways she was working to discredit Francisca much in the same way Antonio de Medrano would work to vilify the women who testified against him, by playing into contemporary stereotypes about women.

Cazalla extended her assault on Hernández’s character into her tachas. Tachas were a series of questions, posed by defendants, to witnesses of their choosing in an attempt to establish capital enmity or object to the prosecution’s witnesses. Typically

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99 Ortega-Costa, Proceso contra María de Cazalla, 209. “su manera de deponer…”
100 Ortega-Costa, Proceso contra María de Cazalla, 209. “la qual esta muy mal conmigo porque a oyo dezir que yo estaba mal con sus cosas.” “ella me tiene mala voluntad porque pensava que mi hermano el obispo estaba mal con ella.”
101 Ortega-Costa, Proceso contra María de Cazalla, 209. “Es persona sospechosa en la fe, muy parlera y que se tomado muchas veces en mentiras y falsedades contra otras personas…”
defendants would call friends or family who knew them well enough to know who bore them ill will. Cazalla exploited her knowledge of Hernández’s *fama* by asking her witnesses:

…if they know Francisca Hernández, prisoner in the jail of the Toledo Inquisition, and if they know that Francisca Hernández is a fraud, unchaste and a big liar, and that Francisca Hernández wants to hurt María de Cazalla because she said that Francisca Hernández is not a good person for she is loose in conversation with men and drags clerics after her as though they were lost, and because María de Cazalla said that those clerics were better off studying than following her…  

This question covers all of the bases. It establishes that Hernández was a prisoner of the Inquisition, points to her shortcomings as a *beata*, and seeks to prove that there was bad blood between these women. Yet in order for this question to be effective, the four witnesses Cazalla called would have to confirm her statements to be true. It was a blow to her case that the fiscal, Diego Ortiz, disqualified all four witnesses; he determined that their suspect character resulted in testimony that lacked credibility and therefore it could not be admitted into evidence. Nevertheless, posing this question should have caused doubt in the inquisitors’ mind as to Hernández’s credibility.

Like María de Cazalla, Antonio de Medrano was able to utilize his familiarity with contemporary legal culture as part of his defense, but in a more directed way. He too was able to identify some of the witnesses who had testified against him – the

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102 Ortega-Costa, *Proceso contra María de Cazalla*, 342. “sean preguntados sy conoçen a Fran[cís]ca Hern[ánd]es, presa que estuvo en la carpel de la Ynquisición de Toledo, e sy saben que la susodicha a sydo y es una muger enbaucadora, liviana e muy mentirosa e que a querido e quiere mal a la dicha María de Caçalla porque oyo dezir della que no estava bien con las cosas de la dicha Fran[cís]ca Fernandes por ser tan suelta como está en conversar con los hombres e traer los clérigos que traya tras ella perdidos y porque la dicha María de Caçalla dizie que mejor estuvieran estudiando los dichos clérigos que no andarse tras ella”

103 *Beatas* were pious women who lived in enclosed communities outside of the cloister.

104 Ortega-Costa, *Proceso contra María de Cazalla*, 359. The fiscal’s decision to dismiss the testimony of these witnesses demonstrates the inconsistent nature of inquisitorial processes: heresy was a serious crime, one that anyone – women, the infamous and even other heretics – could testify to. See Peters, *Inquisition*, 90-97.
majority of whom were women. While also working to bolster his credibility in the eyes of his inquisitors, he played in to sixteenth century stereotypes about women. The irony in this line of defense is the nature of Medrano’s relationship with women: I think it is fair to speculate that he was unable, or at least unwilling, to separate himself from them and their spiritual gifts. While in Salamanca, his reputation was tarnished by what many assumed with an improper relationship with Francisca Hernández, and in Logroño he seems to have been uncomfortably close with the López sisters.

In the first statement attributed to Isabel López, she stated “that she had heard that in a certain house there was a holy man and that a certain person went to see him who was deeply interested in the things of God and took pleasure in hearing them; and arriving there that person said ‘Blessed be God’; and it seemed, to the said person, that the bachiller [Medrano] said ‘the world is not worthy of this’. And the said person went to take the hand to kiss it and he said: ‘and thus the hand is taken to kiss it.’” Although based on what she heard from another individual, in this statement Isabel painted a picture in which Medrano acted as a spiritual master to whom others bowed in recognition of his authority. It was a spiritual error to assume that any person of this earth should be revered as much as God, and even more dubious for a mere cleric to perform religious duties beyond his mandate. Aware of this, Medrano responded by stating “that it [the charge against him] is a mockery; that he doesn’t know or remember such a thing; that this was said by vain women and therefore your Reverences should

105 Escohotado, Proceso contra Antonio de Medrano, 66. “Dixo el segundo testigo [Juana López] que oyó dezir que in cierta casa estava un hombre santo y que cierta persona le fue a ver, pareciéndole bien las cosas de Dios y holgava de las oyr; y llegando allí dixo la dicha persona ‘bedito sea Dios’; y le pareció a la dicha persona que dixo el dicho bachiller: ‘el mundo no es digno d’esto’. Y la dicha persona le fue a tomar la mano para se la besar y él dixo: ‘y así se toma la mano para besarla.’”
discredit them.”

Here Medrano is not only citing his superiority as a member of the clergy, but also as a male. Although he was not given the names of his accusers, he must have realized the person making this particular accusation was a woman. With this information Medrano was implying that the vanity of women resulted in a lack of reliability that would diminish the weight of their testimony. In doing so he was attempting to create distance between himself and this witness in order to demonstrate that a male ecclesiastic was to be given more credibility than a female witness. This was yet another attempt on Medrano’s part to establish some sort of dialogue with his inquisitors: he needed them to see him as an equal so his claims to credibility would be taken seriously. This explains why, as a defense mechanism, Medrano continually flaunted his status, so his inquisitors would know that he was a member of their elite.

Medrano’s choice to invoke stereotypes about women’s supposed inferiority was a brilliant move on his part. He was no doubt aware of contemporary thought regarding the credibility of women and must have believed that his inquisitors would respond to this line of defense. Women in the sixteenth century lived in what we would now term a misogynist society in which they were considered intellectually and morally inferior. These supposed weaknesses were thought to stem from women’s inability to control their more violent passions and a general lack of reason. Theologians, aware of these assumptions, adopted the term “little women” to describe those who attempted to establish a place for themselves in the spiritual world. The notion that women were weak and vulnerable in their attempts to establish a direct relationship with God suited

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106 Escohotado, Proceso contra Antonio de Medrano, 71. “dijo que es burlería; que no sabe ni se acuerda de tal; que es dicho de mujeres vanas que sus Reverencias no devían hacer cuenta d’ellas.”

107 Escohotado briefly mentions the prevalence of misogyny during the sixteenth century (73). For more on Medrano’s relationships with women, see below.
contemporary opinions: “the sixteenth century gender ideology was critical to the attempts to maintain religious, social, and political order. Women were at once virtuous and evil in ways that men were not.”\textsuperscript{108} If social order would have been threatened by a woman’s desire for religious autonomy, any claim she made to spiritual authority was likely to be questioned by the institutional church.

The evolution of Spanish orthodoxy in the early sixteenth century had very different effects on women than it did on men: as spiritual authority was placed in the clergy, from which women were barred, women often found it difficult to establish their spiritual power and authority.\textsuperscript{109} The visionary experiences that had given so many women a voice in the religious community began to be questioned: “Since the source of women’s authority was external revelation or reflection on experience, and since it rested on a charismatic gift, it had to be examined for validity.”\textsuperscript{110} Throughout the era numerous women claimed to have direct access to God through their visionary and revelatory experiences, yet the sincerity of this divine communication was always in doubt. Their supposed inferiority led theologians to believe that women were unable to differentiate between divine and diabolical communication.\textsuperscript{111} Ecclesiastics also had a difficult time believing that God would communicate with the laity, “little women,” or beatas, especially.\textsuperscript{112} Women’s inherent weakness and vanity led many to believe that they were simply not suitable for positions of religious authority. Medrano, who seems

\textsuperscript{109} Ahlgren, \textit{Teresa of Avila}, 7.
\textsuperscript{110} Ahlgren, \textit{Teresa of Avila}, 21.
to have disagreed with these assumptions in practice, exploited contemporary ideas about women to his advantage throughout his defense.

Medrano's familiarity with inquisitorial procedure provided him the perfect opportunity to discredit the prosecution's witnesses through the *tachas* process. In light of the charges against him, Medrano probably knew the identity of at least two of his accusers — the López sisters. His *tachas* confirm this to be the case as the first eleven questions posed to his witnesses attempted to establish the bad reputation (*mala fama*) of these women. Medrano began by asking witnesses "if they know Juana López, wife of Martín Pérez, and Isabel López, wife of Rodrigo García, her sister, residents of the city of Logroño."113 While Medrano had correctly guessed the identity of two of his accusers, this was hardly enough to demonstrate any bias in their testimony. He therefore worked to discredit them individually, starting with Juana. The third question posed to witnesses asked:

if they know that . . . the said wife of Martín Pérez [Juana López] had seen certain veins of blood in the sacrament of the Eucharist, and that she had seen other signs such as a sculpture of our Lady in the church of San Bartolomé which had a child in her arms; and in the crown or diadem of St. John which was painted in that church at the right side of the entrance, below the crucifix, she had seen certain rays of light shoot out; and one night she saw, at the foot of her bed our Lady with her precious son and other idiocies that I cannot remember now.114

Here Medrano painted the picture of a woman who was plagued by repeated visits from the Virgin Mary as well as other strange visions.115 In citing the above passage, he was

113 Escohotado, *Proceso contra Antonio de Medrano*, 83. "...si conozen a Juana López, mujer de Martín Pérez, e a Ysabel López, mujer de Rodrigo García, su hermana, vezinas de la ciudad de Logroño"
114 Escohotado, *Proceso contra Antonio de Medrano*, 83. "si saben . . . la dicha mujer de Martín Pérez deñía que abía bisto ciertas benas de sangre en el sacramento de la eucharista de Nuestro Señor, e que abía bisto outras señales en una ymagen de Nuestro Señora de bulto, que está en la yglesia de San Bartolomé, que tenía un niño en los brazos, y en la corono o diadema de San Juan que está pintada en la dicha yglesia entranando a la mano derecha, que está debajo de un cruzifijo, abía bisto salir ciertos rayos o resplandor y que bia en su casa una noche mucha claridad y a los pies de su cama a Nuestra Señora con su preñoso hijo y otras muchas boberfas que no tengo memoria."
clearly attempting to distance himself from the women he had devoted so much attention to: Medrano was invoking his clerical status as the exact opposite of the "foolish" spirituality of his female followers. Since Juana López was one of many women who were part of his spiritual circle, Medrano was no doubt familiar with her visions. Once he identified her as an adverse witness, he began to exploit this knowledge as part of his defense.

Like María de Cazalla, Medrano must have understood that his character attack on Juana would carry more weight if he could provide multiple examples of her \textit{mala fama}. While discrediting Juana based on her supposed spiritual errors might have been enough for her testimony to have been thrown out, Medrano felt the need to take his character attack even further. He continued by asking witnesses:

\begin{quote}
if they know that the said wife of Martín Pérez has been and is a woman that not being pregnant had made her husband and others to believe that she was nine months pregnant and had gone through labor. And later, she called the midwife and threw herself on the bed in her house showing her her breasts and chest and belly, saying and showing her that she was pregnant; and later it seemed she was empty and not a pregnant for any time or day, and they shall say and declare what happened or what they know about this.\footnote{Escohotado, \textit{Proceso contra Antonio de Medrano}, 83-84. "si saben que la dicha mujer de Martín Pérez á seydo y es mujer que no estando preñada á hecho entender a su marido e otros muchos que estaba preñada/ de nuebe meses e de parto, e que después hazía llamar la partera y que se echaba en la cama y la tenía en su casa mostrándole las tetas y pechos y barriga, diciendo y mostrando que estaba preñada y que después parecía estar barba e no preñada de ningun tiempo ni día, e digan e declaren lo que cerca d’esto pasó o saben." In a later \textit{tachas} question Medrano asked witnesses if Juana’s sister Isabel was guilty of the same deceit. Not only is it curious that both sisters would attempt the same ploy on their husbands and friends, but that Medrano knew about both instances and exploited that knowledge to his benefit.}
\end{quote}

Once again Medrano was able to take advantage of his close relationship with Juana as part of his defense. In addition to labeling her as spiritually troubled, Medrano made sure
his inquisitors knew that Juana López was an infamous liar who was not to be believed. His point in asking this question is clear: if she was willing to lie to her husband and friends about a pregnancy, what would have stopped her from lying to the Logroño inquisitors? Medrano’s ability to plant the seed of doubt about the veracity of Juana’s testimony was a masterful. He applied the same techniques in his attempts to defame Juana’s sister, Isabel López.

If Medrano suspected that Juana López was an adverse witness, he probably assumed that her sister was as well; it seems that whatever relationship he shared with Juana extended to her sister Isabel. Therefore Medrano worked to discredit Isabel through claims of false sanctity, just as he did with Juana. In another tachas question he asked:

if they know that the wife of Rodrigo García [Isabel López] had said many times that Our Lady the Virgin Mary had commanded her to bleed and purge and by her command she bled and purged many times without the counsel of a doctor or without another medicine, and they say what they know about this question.\textsuperscript{117}

This question established that Isabel, like her sister Juana, communicated with the Virgin Mary. Although Medrano did not make clear how these commands were relayed, in noting that Isabel did not consult any authority before acting on them he cast doubt on their legitimacy. He was aware that his inquisitors would question the validity of any command given from the Virgin Mary to a member of the laity, especially a woman. The nature of the command, to have her bleed and purge, would have been unusual, and perhaps a sign of diabolical involvement. In painting this picture of Isabel, Medrano was

\textsuperscript{117} Escohotado, \textit{Proceso contra Antonio de Medrano}, 84, “si saben que la dicha mujer del dicho Rodrigo García á dicho muchas e diversas bezes que Nuestra Señora la Virgen María la mandaba sangrar e purgar e que por su mandado se sangraba e purgaba muchas vezes sin consejo de médico y sin otra medicina,e digan lo que saben sobre’ sta pregunta.”
able to discredit her as a woman who was prone to demonic influence while also bolstering his own credibility. His ability to discredit Isabel on these grounds would have drawn attention to the fact that he recognized such visions as false. In pointing out her weakness for visionary experiences, Medrano established that Isabel could not be trusted and that he, as a member of the clergy who knew right from wrong, was inherently more trustworthy than such a vain woman.

Not satisfied with his portrayal of the López sisters as vain women who were subject to demonic influence, Medrano concluded his attack on their characters by labeling them crazy. He asked witnesses “if they know that they say the said wives of Martin Pérez and of Rodrigo García had said words and other deliriums and confusions saying that Our Father and Our Mother revealed secrets to them, and that they are considered crazy and unpredictable women, and out of their mind, and liars in the said city of Logroño.” All of Medrano’s previous questions about the López sisters led up to this damning question. Since he had previously suggested that they were plagued by false visions and were known liars, it makes sense that his next move would be to call them crazy. Perhaps he assumed that the testimony of someone who was known to be insane would be disqualified. Maybe he believed that the insinuation of insanity would have been enough to cause doubt. Either way, Medrano was willing to pull out all the stops in order to convince the inquisitors that their star witnesses were not to be trusted. It seems that his ability to exploit sixteenth century stereotypes about women, coupled with a firm grasp of inquisitorial procedure, guided Medrano’s ability to disqualify those

118 Escohotado, Proceso contra Antonio de Medrano, 84. “si saben que por dezir las dichas mujeres de Martín Pérez y de Rodrigo García las dichas palabras e otros desbarrios e desconciertos diziendo que Nuestro Señor y Nuestra Señora les rebelaban los dichos secretos, las tenían e tienen por mujeres// locas e desbarriadas e fuera de su seso e mentirosas en la dicha cibdad de Logroño.”
witnesses whom he could positively identify. With their testimony gone, there was little standing in the way of his freedom.

Medrano's familiarity with inquisitorial procedure also allowed him to utilize the *abonos* process to bolster his own credibility. Having been charged with multiple spiritual errors, many of which smacked of *alumbradismo*, it was necessary that he convince inquisitors of his adherence to proper Christian practices. To do this, he called character witnesses who were to be questioned as to the veracity of Medrano's Catholicism. Medrano posed 14 questions to be asked of 25 witnesses, many of whom enjoyed titled positions and therefore may have provided an additional benefit to the defense.\(^{119}\)

Like most inquisitions defendants in the early sixteenth century, Medrano had to establish his Old Christian lineage, which he did at the beginning of his trial and through the first two *abonos* questions.\(^{120}\) He then moved on to a set of questions designed to portray himself as a good Christian, which provided an opportunity for him to exploit the rhetoric of honor in his defense. Among these questions he asked witnesses:

if they know that in the village of Navarrete and Funmayor . . . that Medrano, almost all the time of his life, lived and always lived as a Catholic and religiously as a good Catholic and religious Christian hearing and continuing to hear the divine offices, and, later, as a clerical presbyter, celebrating and administering Holy sacraments, indoctrinating and teaching the religion to others to live a holy and catholic life, inducing and

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\(^{119}\) Escohotado, *Proceso contra Antonio de Medrano*, 75-77. El doctor Diego Hernáez, el bachiller Yanguas, el bachiller Trixiana de Santo Domingo, and el licenciado Albar Pérez were among those asked to testify as character witnesses for the defense. We must remember that the testimony provided by people of prominent social standing may have carried additional weight in the eyes of Medrano's inquisitors.

\(^{120}\) Escohotado, *Proceso contra Antonio de Medrano*, 75. "Pregunta. Primero si conocieron al bachiller P[edr]o D[íez], vecino de la villa de Navarette y ha Toda Hurtado, su muger, padre y madre del dicho bachiller Medrano. Pregunta. Ytem si saben que'l dicho bachiller Medrano sea hombre hijodalgo y por tales avidos e tenidos él y sus hermanos; y que de parte de su madre son de cavalleros y señores de basallos."
attracting those who had conversed with him and who loved to serve to God Our Father and scorned the transitory things of this world.\textsuperscript{121}

This query does more than simply confirm Medrano’s Christianity, it worked to strengthen his credibility as a member of the clergy and portray himself as a man of honor. In drawing attention to those things that he did as a priest – administering the sacraments and teaching Catholicism to others – Medrano was able to establish himself as a man who knew how to do his job. Also, in pointing out that he only indoctrinated those with whom he had conversed, confirming that they “scorned the transitory things of this world,” Medrano demonstrated that he could differentiate an ideal candidate from an unsuitable one. Since honor could be determined by one’s profession, Medrano’s ability to portray himself as a competent cleric would have added weight to his claims to honor and credibility in the eyes of his inquisitors. In all, this question painted the picture of a cleric who was not only capable, but proficient at his job.

While Medrano worked to demonstrate his competency as a priest, María de Cazalla had to play into sixteenth century stereotypes about women in order to gain her freedom. This is one area of Cazalla’s defense that appears strikingly similar to that of Medrano. Yet the way each defendant manipulated this contemporary stereotype was quite different. Where Medrano worked to label women as vain and weak in his attempt to disqualify them as witnesses and to bolster his own credibility, Cazalla did so in order to demonstrate that she understood her place as a woman in sixteenth century society.

\textsuperscript{121} Escohotado, \textit{Proceso contra Antonio de Medrano}, 75. “Pregunta...si saben que así en la v[illa] de Navarrete y Funmayor, donde es natural el dicho bachiller Medrano, como en el dicho estudio de Salamanca, donde á residido e bibido el dicho bachiller Medrano, casi todo el t[ien]po de su bida, á bibido y siemrre bibió católica e religiosamente como Bueno católico y religioso cristiano oyendo y continuando oyr los dibinos oficios, y, después, de clérigo presbítero, celebro y administrando [los] santos sacramentos, dotirando y enseñando a los otros a religiosa, santa e católica bivir, ynduciendo y atrayendo a los que con él conversaban a que amasen y sirbiesen a Dios Nuestro Senor y menospreçiasen las cosas transitorias d’este mundo.”
She was able to do so by invoking the hierarchical relationships that existed between men and women and between the Church and laity. Since women in the sixteenth century were thought morally, spiritually, and intellectually inferior, Cazalla's ability to play into these stereotypes aided her defense.

During her trial Cazalla often made statements indicating that she always submitted herself to the authority of the Church. When accused of believing the Erasmian errors and praising the book by Juan de Valdez, the *Doctrina Cristiana*, which contained many heretical statements, Cazalla admitted that she had once praised this book. Yet when she heard that the book was full of errors, she hid it until the Church made a formal ruling on its contents, telling her inquisitors that "I hold nothing as good or well taught until the Catholic Church says and holds it as good." She had to have recognized that one or more adverse witness had testified to hearing her praise this book. Rather than deny it, she admitted to this error in order to demonstrate that she would always change her opinions to conform to those of the Church. This was an effective rhetorical strategy: in stating that she only believed those things deemed true by the Catholic Faith, Cazalla submitted herself to ecclesiastical authority while also recognizing that she, as a woman, was prone to making errors in judgment. Nevertheless, as a devout Catholic, Cazalla would always quickly correct her beliefs to conform to those of the Church.

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122 This text, *Diálogo de doctrina cristiana*, was published in 1529 by Juan de Valdés. Shortly after its publication the book came under suspicion by the Holy Office for its heretical content: it appears to have been influenced by contemporary reformers such as Erasmus and Luther. Hamilton, *Heresy and Mysticism* 39-42.

123 Ortega-Costa, *Proceso contra María de Cazalla*, 137. "y así he dicho que lo terné por bueno hasta en tanto que la Yglesia Cathólica nos denunce otra cosa... yo no tengo cosa por buena ni bien guiada sino aquello que la Yglesia Cathólica dize y tiene por bueno..."
As a member of the Cazalla family, María was able to cite humility to her brother, Bishop Juan de Cazalla, as part of her defense. Juan, like his sister, was also a prominent figure in the *alumbrado* movement. Although he was not alive at the time of her trial, Juan provided María with another means of demonstrating humility to social hierarchies. For example, María was charged with believing that the existence of Mary Magdalene, Saint Ann, and the three Ann’s was a joke, and with saying that those who believed these things were stupid. Her defense to these charges was to hide behind her brother. She told inquisitors that Juan had told her that there were holy doctors who held this to be true and that he had left her two books on these topics. She concluded her statement by saying “I have said that I only repeat things that I have heard my brother say, and that I never had nor do I have an opinion other than what the Catholic Church has.” Once again Cazalla humbled herself to the authority of the church, but in this instance she also submitted to the authority of an older, wiser brother. María’s ability to exploit this societal standard to her advantage demonstrated intuition on her part: she knew that she was more likely to gain credibility if she could demonstrate that she knew her place in society. In exploiting Juan de Cazalla’s clerical status as part of her defense, she was able to express familiarity with ecclesiastical and societal standards while also explaining the source of her supposed heretical ideas.

The inquisition trials of María de Cazalla and Antonio de Medrano illustrate the range of inventiveness among defendants in this early period of inquisition history: not only was it possible to mount a defense, many defendants were quite resourceful in the strategies they employed. Where Medrano exploited contemporary stereotypes about

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124 Ortega-Costa, *Proceso contra María de Cazalla*, 139. “Ya he dicho que lo que en esto dezía era lo que oya dezir a mi her[man]o, que yo nunca tove ni agora tengo otra opinión sino la que la Yglesia Cathólica tiene.”
women as part of his defense, Cazalla utilized her rhetorical prowess to the same ends. The both displayed an astounding familiarity with contemporary legal traditions and inquisitorial procedure, which they drew on to establish their own credibility while disqualifying adverse witnesses. The tenacity and bravery exhibited by these individuals proves that not all inquisition defendants were victims of a mechanized inquisitorial process: inconsistencies in procedure and between tribunals made it possible for prisoners to make their voices heard and successfully navigate the inquisitorial system.

While the trials of Cazalla and Medrano are informative from a defensive standpoint, they also tell us something about the degree of opposition to the Holy Office. Recent research has demonstrated that the ecclesiastical community in Spain opposed the Inquisition from its inception\(^{125}\), but Medrano and Cazalla suggest methods of resistance from those who faced charges of heresy. Cazalla’s willingness to violate the Inquisition’s oath of secrecy and covertly correspond with her fellow inmates implies that she had no qualms about challenging the Inquisitorial system. Likewise, Medrano’s adherence to a more sensual brand of spirituality, which resulted in multiple encounters with the Inquisition, indicates that he was not intimidated by the power of the Holy Office. Yet these are only two examples of the many ways defendants made their opposition known.

There is still much to be learned about defense strategies and, by extension, the ways in which prisoners challenged the Inquisition. As inquisition scholars explore the thousands of transcripts waiting to be analyzed, their work will continue to add to our knowledge of how Inquisition prisoners defended themselves.

\(^{125}\) Stefania Pastore, Il vangelo e la spada. L’Inquisizione de Castiglia e i suoi critici (1460-1598), (Rome: Edizioni di Storia e Letteratura, 2003).
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