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WOMEN AND POISONS IN 17TH CENTURY FRANCE

BENEDETTA FAEDI DURAMY*

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INTRODUCTION

During the late 1660s and the early 1670s, several mysterious deaths of influential members of the French nobility followed one after the other, leading to a scandal, better known as the “Affair of the Poisons,” which involved prominent individuals at the royal court of Louis XIV in France. The King, who was concerned that the widespread use of the practice of poisoning could endanger his own safety and that of the royal family, appointed Nicolas de La Reynie, the Lieutenant General of the Paris Police, to oversee the investigation. In 1679, he also established a special tribunal, known as the *Chambre Ardente*, to prosecute the murders. The court ruled for over three years, issuing 319 subpoenas, arresting 194 individuals, and sentencing 36 of them to death.

This article examines the involvement of three women who were prominently implicated in the scandal: the Marquise de Brinvilliers, whose trial rocked the royal court of Louis XIV and whose decapitation

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engaged the public imagination; the sorceress Catherine La Voisin, who was prosecuted and burned alive for providing important members of the royal court with magic powders and venomous potions; and finally, the Marquise de Montespan, one of the favorite mistresses of Louis XIV, who allegedly purchased love powders from La Voisin and participated in black masses, but whose direct involvement in the scandal was never conclusively determined by the *Chambre Ardente*.

By investigating the implication of these three emblematic female characters in the Affairs of the Poisons, this article interrogates the discourse surrounding gender and crime in history, deepening the understanding of women's motivation to commit murder and the strategies they adopted. Moreover, the article examines how the legal system addressed women's crime, differentiated responses based on their class and social rank, and held women accountable for poisoning the country, thus failing to acknowledge the actual shortcomings of the French monarchy, the decline of Catholicism as well as women's constraints in the patriarchal society.

The remainder of the article is organized as follows. Part I describes the life and crimes committed by Marie-Madeleine Marguerite D'Aubray, Marquise de Brinvilliers, whose trial marked the true beginning of the Affair of the Poisons and the relevant investigations. Part II recounts the story of the sorceress Catherine Deshayes, Madame Montvoisin, known as La Voisin, whose arrest signaled the pivotal moment for the unfolding of the scandal and the identification of its affluent participants. Part III examines the institution and functioning of the *Chambre Ardente*, the special criminal commission established by Louis XIV to investigate and prosecute the relevant crimes and suspects. Part IV portrays the life, ambition, and involvement of Françoise Athénaïs de Rochechouart de Mortemart, Marquise de Montespan, in the Affair of the Poisons. Finally, Part V investigates the art of preparing venous and love potions in seventeenth century France, the celebration of black masses and magical rituals as well as the societal conditions of women and their subsequent motivations to poison.

I. MARIE-MADELEINE MARGUERITE D'AUBRAY, MARQUISE DE BRINVILLIERS*

Three years before the Affair of the Poisons officially began the trial of the famous serial poisoner, Marie-Madeleine Marguerite d'Aubray, Marquise de Brinvilliers, had already shocked the royal court of Louis XIV and engaged the public imagination. The highly-born Marie Madeleine Marguerite d'Aubray was the eldest of five children of

Antoine Dreux d'Aubray, who was Seigneur of Offemont and Villiers, Councillor of State, Master of Requests in 1638, Civil Lieutenant of the city of Paris in 1643, and Lieutenant General of the Mines of France.¹ Traditionally, her family had belonged to the legal group of magistracy, which retained much prestige and reputation in the contemporary French society.² In 1651, Marie Madeleine Marguerite d'Aubray married Antoine Gobelin, Marquis de Brinvilliers and Baron de Nourar, thus entering, at the age of only seventeen, the dissolute French aristocratic entourage. The marriage was most likely arranged between the high-ranking family d'Aubray and the wealthy Marquis de Brinvilliers, son of the former president of the French audit office.³

Marie Madeleine Marguerite d'Aubray was portrayed as "a woman of much attraction. Her skin was extraordinarily white. Her hair was very thick, and of the deepest nut-brown hue. Her eyes were blue. She was not tall, but exceedingly well formed. Her intelligence was above the average. In one respect her education had been good."⁴ On the other hand, the Marquis de Brinvilliers was depicted as "a man without morals. Far worse, he was a man without strong personal character, weak as water and unstable as sand."⁵ Within only a few years of marriage, the Marquise de Brinvilliers became accustomed to the libertine practices of the French aristocracy, especially since her husband was not much concerned about her, but rather indulged in his own debauchery and dissolute gambling.

In fact, she became the mistress of Gaudin de Sainte-Croix, an attractive young army officer of ill repute whom Marquis de Brinvilliers had met in 1659 when they were serving in the same regiment and with whom he had become a bosom friend ever since.⁶ The affair between the two was initially tolerated by her husband until it collided with his financial interests. Indeed, following Gaudin de Sainte-Croix's advice, when Marie de Brinvilliers began to consider initiating legal

* For a short biography of Marquise de Brinvilliers, see Benedetta Faedi Duramy, *Brinvilliers, Marquise de*, in 2 *WOMEN CRIMINALS: AN ENCYCLOPEDIA OF PEOPLE AND ISSUES*, 333-335 (Vickie Jensen ed., ABC-CLIO, 2012).

1. HUGH STOKES, *MADAME DE BRINVILLIERS AND HER TIMES 1630-1676*, at 64 (1912). See generally ME HENRI-ROBERT, *LES GRANDS PROCES DE L'HISTOIRE* (2d ed. 1922); JAQUELINE HUAS, *MADAME DE BRINVILLIERS, LA MARQUISE EMPOISONNEUSE* (2004); JACQUES SAINT GERMAIN, *MADAME DE BRINVILLIERS, LA MARQUISE AUX POISONS* (1971); VIRGINIA VERNON, *ENCHANTING LITTLE LADY: THE CRIMINAL LIFE OF THE MARQUISE OF BRINVILLIERS* (1964).

2. STOKES, *supra* note 1, at 53.

3. *Id.* at 63.

4. *Id.* at 65.

5. *Id.* at 63.

6. GEORGES MONGRÉDIEN, *MADAME DE MONTESPAN ET L'AFFAIRE DES POISONS* 22-34 (1953).

action to separate her fortune from that of her husband, who was lavishly dissipating their joint patrimony, a public scandal unfolded. Concerned about a negative reputation for the entire d'Aubray family, initially two of her brothers and finally her father, Antoine Dreux d'Aubray, urged Marie de Brinvilliers to break off her relationship with Gaudin de Sainte-Croix. It is said that "as father [Dreux d'Aubray] implored [his daughter] to respect the honour of her family; as a magistrate he threatened her with every punishment at his command."⁷

In spite of this pressure from her family, Marie de Brinvilliers disdained complying with her father's demands and resolutely continued the liaison with Sainte-Croix. Her resistance finally led Dreux d'Aubray to extreme action in requesting the King to issue an order of arrest, or *lettre de cachet*, against Gaudin de Sainte-Croix. In 1663, the chevalier Gaudin de Sainte-Croix was publicly arrested in the name of the King and immediately transported to the fortress-prison of the Bastille in Paris. Such a public insult could not be forgiven by either the Marquise or her paramour. During his three months of custody, Gaudin de Sainte-Croix made the acquaintance of the Italian poisoner Exili, who had joined several royal households, had been accused of many crimes, and, thus, was feared by every European court at that time. Initiated into the practice of poisoning by his comrade, Gaudin de Sainte-Croix made practical use of his skill upon his release from prison.

Indeed, he soon became a masterful distiller and joined the lucrative business of poisons. Under his guidance, Marie de Brinvilliers began experimenting with lethal poisons testing them on her own servants and the patients of the Hotel de Dieu, the great public hospital. As one of the many ladies of the Parisian nobility who volunteered to visit the sick at the hospital, the Marquise de Brinvilliers was allowed to wander around the halls undisturbed. It is said that she bestowed sweets, biscuits, and wine on her unfortunate patients, who invariably died soon afterwards.⁸ Still enraged with her own family and aspiring to appropriate the entire family fortune, she finally poisoned her father in 1666 and her two brothers in 1670. The crimes were not detected; the autopsies stated that Antoine Dreux d'Aubray had died of natural causes, and both his sons of "malignant humour."

However, in 1672, upon the mysterious death of Gaudin de Sainte-Croix that probably occurred during one of his lethal experiments, a

7. STOKES, *supra* note 1, at 78.

8. *Id.* at 138. See also FRANTZ FUNCK-BRENTANO, *LE DRAME DES POISONS* (1928).

casket containing incriminating letters and conclusive evidence against Marie de Brinvilliers was discovered by the police. She promptly fled to London and later to Holland. Finally, in 1675, she was arrested in a convent at Liège and transported back to France. During the trial, Marie de Brinvilliers was denied the aid of a legal counsel and, hence, stood alone in her own defense. The Marquise stubbornly refused to admit that she had poisoned her father and her two brothers, even when the court beseeched her: "You are now perhaps at the end of your life. I beg of you to reflect seriously over your wicked conduct, which has brought upon you not only the reproaches of your family, but even of those who participated in your evil life."⁹

In her defense speech, the Marquise de Brinvilliers proclaimed her innocence and accused her former lover, Gaudin de Sainte-Croix, of having deceived her "because, under a wise and good outward appearance, there was hidden one of the blackest and most detestable souls in the whole world."¹⁰ Her defiant attitude upset the judges, who eventually found her guilty according to the following judgment:

[S]he is condemned to make the "amende honorable" (or public penance) before the principal door of the cathedral church of Paris, where she will be taken in a tumbrel, with naked feet, a rope round her neck, and holding in her hands a lighted torch weighing two pounds. There, being on her knees, she will declare that wickedly, and from motives of vengeance, and in order to possess their property, she has poisoned her father and her two brothers, and attempted the life of her sister. From thence she will be conducted to the Place de Greve, to have her head cut off upon the scaffold. Her body will then be burnt, and the ashes thrown to the wind. Before execution she will be applied to the "question," ordinary and extraordinary, in order to compel her to reveal the names of her accomplices. Any goods she may have inherited through the deaths of her father, her brothers, and her sister, will be taken from her, and all property confiscated.¹¹

Right before enduring the painful torture of water, the Marquise de Brinvilliers finally confessed to having poisoned her father and her two brothers as well as having attempted to poison her sister-in law and her husband several times. "Who would have believed it of this woman of highly respectable family, of a delicate little creature such as

9. STOKES, *supra* note 1, at 267.

10. *Id.* at 271.

11. *Id.* at 329–330.

this, with her apparently gentle disposition?" Nicolas Gabriel de La Reynie, newly appointed chief of the Paris police, wondered.¹²

Nevertheless, Madame de Brinvilliers admitted to having committed the utmost crimes "out of ambition for her family and her children,"¹³ and to assure herself and her offspring the family fortune that her father had instead assigned entirely to his male successors. Therefore, intentioned to ensure that her children could receive the education and social ranking they deserved, the Marquise de Brinvilliers had resolutely decided to poison her father and brothers. One of her contemporaries reported her tenacious scheme to kill her father and her husband:

It took her eight months to finish off her father. . . . To all his caresses and his affections, her only response was to double the dose. . . . She tried frequently to poison her husband, too, to be free to marry Sainte-Croix; but the latter, wanting no part of such a wicked woman, gave the husband counterpoison. . . . So that, after five or six doses of poison, and five or six doses of counterpoison—poisoned and then disempoisoned, batted back and forth between life and death, the poor man somehow managed to survive!¹⁴

Despite her confession, Madame de Brinvilliers was not spared the water torture. "They must be planning to drown me in those vats!" she exclaimed: "as tiny as I am, I could never swallow such quantities!"¹⁵ Her trial comprised twenty-two sessions over the period of two and a half months, at the end of which the only incontrovertible evidence against her was her own confession that she claimed had been composed in a state of fever delirium.¹⁶ Marie de Brinvilliers was beheaded publicly and burned on a pile of wood on July 16, 1676. Considered to be a dissolute criminal until the day of her execution, she then became a martyr for the populace. One of her contemporaries noticed that at her decapitation "never has Paris seen such crowds of people. Never has the city been so aroused, so intent on a spectacle."¹⁷ And yet, "the

12. FRANCES MOSSIKER, *THE AFFAIR OF THE POISONS: LOUIS XIV, MADAME DE MONTESPAN, AND ONE OF HISTORY'S GREAT UNSOLVED MYSTERIES* 143 (1969).

13. *Id.* at 144.

14. MARQUISE DE SÉVIGNÉ, *LETTRES* (Paris, 1862).

15. MOSSIKER, *supra* note 12, at 146.

16. *Id.* at 144–45.

* For a short biography of Catherine La Voisin, see 2 Benedetta Faedi Duramy, *Catherine La Voisin*, in 2 *WOMEN CRIMINALS: AN ENCYCLOPEDIA OF PEOPLE AND ISSUES* 507–508, (Vickie Jensen ed., ABC-CLIO, 2012).

17. MARQUISE DE SÉVIGNÉ, *supra* note 14

next day, the people went searching through the ashes for La Brinvilliers's bones."¹⁸

Her murder case revealed that poisoning was the obscure cause of many mysterious deaths that had occurred in the elite French society. In fact, just before her execution, she exclaimed: "Out of so many guilty people must I be the only one to be put to death? . . . [And yet] half the people in town are involved in this sort of thing, and I could ruin them if I were to talk."¹⁹

The Court of Paris was eager to discover the name of her accomplices and purveyors as well as the secret of the poisons and antidotes she had used. "It is in the public interest . . . that Mme de Brinvilliers's crimes end with her, and that she makes a declaration that will help us to prevent the continued use of poison," announced the President Lamoignon of the Paris Parlement.²⁰ However, she did not betray her accomplices and admitted only having used arsenic, vitriol, and venom of toad as poisons, and milk as antidote.²¹ However, those to whom she alluded were later implicated in the larger scandal of the Affair of the Poisons, which affected the royal court of Louis XIV and involved some of his closest courtiers.

II. CATHERINE DESHAYES, MADAME MONTVOISIN, KNOWN AS LA VOISIN*

The death of the Marquise de Brinvilliers was followed by the arrest of several alchemists, counterfeiters, and poisoners, lending credence to her final admonition. Concerned that the spreading use of the practice of poisoning could endanger the safety of the royal family and the members of the royal court, King Louis XIV appointed Nicolas de La Reynie, the Lieutenant General of the Paris Police, to oversee the investigation.²² In the laboratories of the arrested magicians and alchemists, the police found furnaces, forceps, and magical minerals, like sulfur and mercury, as well as lethal poisons such as arsenic, nitric acid, and mercuric chloride.²³ La Reynie soon discovered the unimaginable dark world of Parisian witchcraft, disclosing "vials, vats, jugs, jars, and pack-

18. *Id.*

19. ANNE SOMERSET, *THE AFFAIR OF THE POISONS: MURDER, INFANTICIDE AND SATANISM AT THE COURT OF LOUIS XIV* 40 (2003).

20. MOSSIKER, *supra* note 12, at 145.

21. *Id.* at 146.

22. LYNN WOOD MOLLENAUER, *STRANGE REVELATIONS: MAGIC, POISON, AND SACRILEGE IN LOUIS XIV'S FRANCE* 1 (2007).

23. MOSSIKER *supra* note 12, at 150.

ets, the crystals, potions, and potpourris",²⁴ and cauldrons with "deadly nightshade (belladonna), witches' thimble (digitalis), root mandragore (or mandrake, podophyllin), powder of cantharis, of toad and bat and viper, blobs of hanged-man's fat, nail clippings, bone splinters, specimens of human blood, excrement, urine, [and] semen."²⁵

In 1679, the Affair of the Poisons unfolded dramatically with the arrest of the witch and serial poisoner Catherine Deshayes, Madame Montvoisin, known as La Voisin. Born in 1640 in France to a poor woman who was probably a sorceress herself, Catherine Deshayes was initiated into magic powers at an early age. She married Antoine Montvoisin, whose businesses in the silk trade and jewelry both led him into bankruptcy. As a result, her husband lapsed into heavy drinking and to violently venting his frustrations out on her. Having to support him and her numerous children, she probably turned into the criminal, but lucrative, business of abortion and the preparation of poisons.²⁶ Her marriage was so unhappy that she never made a secret of her intention to get rid of her husband; indeed, she made several unsuccessful attempts on his life. In any event, Madame Montvoisin engaged in many love affairs with other wizards and alchemists, among whom was Le Sage, who was later also dragged into the Affair of the Poisons.²⁷

La Voisin was a high priestess of Christian congregations in Paris and a pious worshipper, who conceived her occult powers as a gift from God. Her clients, who primarily belonged to the French high society, were likely reassured by such a religious devotion to her magical practices. One of her contemporaries, the Marquis de la Reviere, noted that La Voisin "was full of delicious little secrets for the ladies . . . for which the gentlemen could be grateful . . . [She] could make a lady's bosom more bountiful or her mouth more diminutive, and she knew just what to do for a nice girl who had gotten herself into trouble."²⁸

Madame Montvoisin received her clients in a small room hidden at the back of the garden of her house located in Ville-Neuve, a secluded area in the northern outskirts of Paris.²⁹ During the late 1660s to the early 1670s, several mysterious deaths of influential members of the

24. *Id.* at 157.

25. *Id.*

26. WOOD MOLLENAUER, *supra* note 22, at 22.

27. SOMERSET, *supra* note 19, at 153.

28. MOSSIKER, *supra* note 12, at 177.

29. WOOD MOLLENAUER, *supra* note 22, at 21.

nobility followed one after the other. When in 1676 the Marquise de Brinvilliers, who was accused of having heartlessly poisoned her father and her two brothers, was finally arrested and then prosecuted, she revealed that most of the individuals she knew, "people of quality," were equally implicated in similar misdeeds.³⁰

Catherine La Voisin was arrested on March 12, 1679 as she was coming out from Mass at her parish church, Notre-Dame de Bonne Nouvelle, in Paris. The search of her premises revealed all sorts of magic powders, venomous potions, sacrilegious objects, "*Grimoires* or black books (primers for Satanists and necromancers, the ABC's of Abracadabra), sacerdotal vestments and paraphernalia, a cross, incense, black tapers; a mysterious oven in a garden pavilion, redolent of evil, noxious fumes; fragments of human infants' bones in the ashes,"³¹ as well as a long list of her clients. She was accused of having attempted to poison her husband several times at the instigation of her paramour, Le Sage, and of having performed abortions for a fee, burying the premature infants in her garden.

On March 17, 1679, when Le Sage was arrested as well, he provided Nicolas de La Reynie with detailed accounts of La Voisin's business of abortions, traffic in poisons, and her customers. He revealed that a small oven was hidden in her house "where the bones were burned if the infant body seemed too large to lay away in a garden grave."³² She denied everything, clarifying that the oven was used to bake her "*petits pates*" (little pastries) and that "the only drugs to be found in her house were purgatives for her personal use and that of her family."³³ Further accusations against Madame Montvoisin came from other prisoners claiming that her secret "to empty" pregnant clients consisted of injecting lethal liquid with a syringe:

—What's her secret to empty women or girls that are pregnant?

—Yes, it's basically water, and everything depends on the way the syringe is used.

—Until which stage of the pregnancy can she do it?

—Any time, especially when they are persons of quality, who must preserve their honor and don't want to make it public. As long as she can feel the baby moving before using her remedy, she will make the baby come out and baptize her/him. Then, she herself brings the baby in a box to the gravedigger, to whom she gives a coin of thirty

30. MOSSIKER, *supra* note 12, at 145.

31. *Id.* at 179.

32. *Id.* at 185.

33. *Id.*

cents, in order to bury her/him in a corner of the cemetery, without telling the priest or anyone else.³⁴

La Sage also claimed that most of La Voisin's visitors belonged to the King's entourage, and even a maid of the Marquise de Montespan, one of the favorite mistresses of Louis XIV, had purchased love powders from her. Catherine La Voisin initially counterclaimed that "nothing but beauty balms and skin lotions" was procured for her clients.³⁵

In response to the allegations against Madame de Montespan, the King solicited La Reynie "to continue the questioning of certain of the prisoners . . . [and] to proceed as speedily as possible with such interrogations, but to make the transcripts of these responses on separate folios, and to keep these folios apart from the official records of the rest of the investigation."³⁶ Indeed, the interrogations of La Sage and other informants containing allegations against the Marquise de Montespan were all scrupulously removed from the trial dossier, never handed over to the judges of the Chamber for their scrutiny, but instead delivered exclusively into the trustworthy hands of La Reynie.

Eventually, Catherine La Voisin admitted that some of her customers were indeed prominent figures of the nobility, but firmly denied ever having served the Marquise de Montespan or even meeting with her. During her last interrogation, when she was subjected to torture, she admitted that "Paris is full of this kind of thing and there is an infinite number of people engaged in this evil trade."³⁷ However, regarding her customers, she only confessed that "a great number of persons of every sort of rank and condition addressed themselves to her to seek the death of or to find the means to kill many people,"³⁸ but refused to utter further names. Catherine La Voisin was burned at the stake in 1680. Spectators at her execution reported that "five or six times, she pushed aside the straw, but finally the flames leaped up, enveloped her, and she was lost to sight. . . . So, there you have the death of Mme Voisin, notorious for her crimes and impiety."³⁹

34. MONGRÉDIEN, *supra* note 6, at 45–46 (translated from French by the author).

35. MOSSIKER, *supra* note 12, at 185.

36. *Id.* at 186.

37. SOMERSET, *supra* note 19, at 231.

38. *Id.*

39. MOSSIKER, *supra* note 12, at 219.

III. THE *CHAMBRE ARDENTE*

The testimony of La Voisin and her accomplices revealed a clandestine conspiracy against the monarchy. The Lieutenant La Reynie recommended that the King establish a special commission to investigate and prosecute the cases. Despite the heavy cost of creating such a criminal tribunal and the potentially negative effects on the reputation of his court, Louis XIV agreed to this proposal and, in 1679, established the *Chambre Ardente*. Apparently, the King decided to create the special criminal commission to preclude a great backlog of criminal cases and a long delay in the investigation and prosecution of the perpetrators.⁴⁰ On the other hand, according to some historians, Louis XIV and his delegates resolved to appoint a special court to handle the cases in order to conceal the illicit activities of prominent members of the royal entourage.⁴¹

Thirteen magistrates from the Supreme Court of Paris were appointed to serve on the *Chambre Ardente*. They were responsible for investigating and prosecuting the individuals "accused of involvement in evil spells and composing, distributing, and administering poison."⁴² It should be noted that, according to a criminal ordinance dated 1670, *magic* and *poisons* were considered to be capital offenses and were listed among the crimes under the direct jurisdiction of the royal magistrates, including treason, sacrilege, heresy, resistance to the orders of the king or his officials, unlawful assembly, counterfeiting, forgery, rape, and abortion.⁴³

The new commission employed a clerk who was responsible for recording the meetings of the judges as well as the interrogations of the prisoners; some doctors and pharmacists to corroborate the evidence and provide medical reports; a general prosecutor, who was responsible for filing the complaints, pursuing the prosecution, and proposing the punishment; and, finally, some reporters, including La Reynie, who were to be in charge of leading the investigations and submitting relevant reports to the magistrates of the court. Historical accounts described the special commission as follows:

40. WOOD MOLLENAUER, *supra* note 22, at 23. See also GISELE CHAUTANT, *CROYANCES ET CONDUITES MAGIQUES DANS LA FRANCE DU XVII^{ÈME} SIÈCLE D'APRÈS L'AFFAIRE DES POISONS* 22 (1998).

41. WOOD MOLLENAUER, *supra* note 22, at 23.

42. Lettre patentes du 7 avril 1679, *Archives de la Prefecture de Police*, 103-120.

43. See MARCEL MARION, *DICTIONNAIRE DES INSTITUTIONS DE LA FRANCE, AUX XVII^E-XVIII^E SIÈCLES* (1984).

The *Chambre* was a deluxe production in the genre of the seventeenth-century theater of justice. Its proceedings a state secret, its members sat in judgment in the basement of the Arsenal, the windows draped in black cloth, the only light provided by flaming torches. These torches lent the tribunal its unofficial name, the *Chambre [A]rdente*, or Burning Chamber.⁴⁴

The commission followed the standard procedure, according to which La Reynie was responsible for identifying the suspects and then submitting a request for an express authorization by the King to proceed with the arrest. Once Louis XIV had signed the warrant, La Reynie could order the capture of the suspects and their detainment in the prisons of the Bastille, the Chatelet, or the fortress of Vincennes. Following the initial interrogations, an official preliminary investigation could be authorized by the general prosecutor, allowing La Reynie to conduct further interrogations of the suspects and the witnesses, cross-examinations, and collection of the evidence. Findings from such preliminary investigations were then reported to the magistrates of the *Chambre*, who would decide whether the suspects should be kept in custody or should be released.

If the accused was imprisoned, a second investigation was carried out by La Reynie. Upon its completion, the general prosecutor would release the indictment and the judges, in turn, would question the suspect and then issue the judgment. Their ruling was definitive, and only the King could change the sentence. The magistrates could dismiss the charges and liberate the accused or release the suspect without dropping all of the charges. Alternatively, the magistrates could also set the accused free but still leave the case open should new evidence be presented. Finally, in case of conviction, the judges could fine, banish, or sentence the defendant to death as well as ban her or him from holding office, testifying in court, or writing a will.

If the defendant was found guilty of a capital crime, the judges could command that the convicted should be subjected to torture before the execution in order to obtain a confession or ascertain the names of any accomplices. According to royal laws, in capital offenses, prisoners could undergo torture even before a guilty verdict had been reached in the case of serious suspicion, or proximate or half-proof of guilt.⁴⁵ Written evidence, the testimony of two witnesses, and the testimony of one eyewitness to the crime amounted to proximate or half-evidence. The confession of the accused obtained under torture com-

44. WOOD MOLLENAUER, *supra* note 22, at 24.

45. *Id.* at 25.

bined with a proximate or half-proof constituted conclusive evidence of guilt. Thus, torture was administered to corroborate evidence, and "to know the truth from [the accused's] mouth."⁴⁶

However, according to the criminal ordinance dated 1670, a prisoner could be tortured only once, unless further evidence was presented, for no more than eighty-five minutes. Under torture, the accused could not be asked any leading questions, and his/her confession should have been freely confirmed again within the following twenty-four hours. Suspects could be subjected to ordinary torture or extraordinary torture. The two primary methods that could be used were the boot torture and the water torture, which have been described as follows:

In the [boot torture], the prisoner's feet and legs were placed in a wooden mold and "coins" or wedges (four for the ordinary and four more for the extraordinary) were driven into the sides of the boot, causing the mold to tighten and crush the prisoner's bones. In the [water torture], the prisoner was stretched naked over a short stool placed in the small of the back, hands and feet tied and pulled in opposite directions. He or she was then forced to swallow four *coquemards* (a *coquemard* was roughly three pints) of water, which distended the stomach almost to bursting and nearly drowned the prisoner. For the extraordinary, the prisoner was bent backward over an even higher stool, causing greater distension of the stomach, and forced to drink four more jugs of water.⁴⁷

La Reynie and the new commission were fully entrusted by Louis XIV to discover the intricacy of the poisons' traffic, regardless of the rank and prestige of the people implicated. In his personal notes, La Reynie described the clear command that both the judges and himself received from the King:

His Majesty desires that for the public good we penetrate as deeply as is possible for us into the unhappy commerce of the poisons in order to root it out, if that were possible; he commanded us to exercise scrupulous justice, without any regard to person, condition, or sex, and His Majesty told us this in such clear and vivid terms, and at the same time with such good will, that it is impossible to doubt his intentions in this regard.⁴⁸

On the other hand, members of the nobility resisted the activities of the special commission protesting that

[t]here is no excuse for that Chamber's impudence in issuing warrants with so little justification against officers of the Crown. . . . This

46. *Id.*

47. *Id.* at 26.

48. *Id.* at 36.

scandalous affair must be horrifying all Europe, and those who read of it in history books a hundred years from now will surely pity the victims of such baseless accusations.⁴⁹

By 1680, the cases brought before the *Chambre Ardente* included not only the traffic of poisons and the mysterious deaths allegedly related, but also cases of sacrilege, witchcraft, and profanation. Indeed, also under such charges, La Voisin was interrogated one last time on February 22nd. She was subjected to the torment of the boot torture in the hope of extorting her confession about her delivery of powders and venous potions to prominent members of the royal court, including Madame de Montespan. Like the Marquise de Brinvilliers, Catherine La Voisin denied the charges and only

[f]or the sake of clearing her conscience, she would state that a large number of persons of all sorts and conditions had come to ask her help in killing off a large number of other persons . . . and that it is debauchery which is at the root of all this evil.⁵⁰

As in the case of La Voisin, during the seventeenth century in France only a few prisoners who endured the agonies of torture ended up confessing their crimes, thus showing the ineffectiveness of such means to extract truth or corroborate evidence.⁵¹

The *Chambre Ardente* was dissolved on July 21, 1682 after having ruled for over three years with one interruption of about seven months between September 30, 1680 and May 19, 1681. The special criminal commission charged 442 individuals, issued 319 arrest warrants, pronounced 104 judgments, including 36 sentences to death, 5 to life imprisonment, 23 to banishment, numerous releases from prison, and several decisions of imprisonment in monasteries or hospitals.⁵² About 60 accused individuals, who could not be judged for reason of State, were incarcerated for life in Belle-Ile, Salces, Salins, and other fortresses.⁵³

49. MOSSIKER, *supra* note 12, at 205.

50. *Id.* at 216.

51. WOOD MOLLENAUER, *supra* note 22, at 26.

52. ARLETTE LEBIGRE, 1679–1682, L’AFFAIRE DES POISONS 165 (2001).

* For a short biography of Marquise de Montespan, see Benedetta Faedi Duramy, *Montespan, Marquise de*, in 2 WOMEN CRIMINALS: AN ENCYCLOPEDIA OF PEOPLE AND ISSUES 542–544, (Vickie Jensen ed., ABC-CLIO, 2012).

53. *Id.*

IV. FRANÇOISE ATHÉNAÏS DE ROCHECHOUART DE MORTEMART, MARQUISE DE MONTESPAN*

Françoise Athénaïs de Rochechouart de Mortemart, Marquise de Montespan was one of the favorite mistresses of Louis XIV, King of France, who became personally involved in the disgraceful scandal of the Affair of the Poisons that brought many poisoning cases to justice. Born on October 5, 1640 in the Château de Lussac, she belonged to one of the oldest and most illustrious families in France. Her father was the Marquis de Lussac, Seigneur de Vivonne, Duc de Mortemart, Prince de Tonnay-Charente, First Gentleman of the King's bedchamber, Chevalier of the Order of the Holy Ghost, and a councilor of State, who held several prestigious appointments at the royal court of Louis XIII; her mother was a lady-in-waiting to Queen Anne of Austria.⁵⁴ Françoise Athénaïs studied at the Convent of Sainte Marie at Saintes and, in 1661, joined the royal court as a maid of honor to the King's sister-in-law, Princess Henrietta Anne of England, who had recently married the Duc d'Orleans.

Her sovereign beauty was recounted by Primi Visconti, the Comte de Saint-Mayol, in his memoirs: "She was of medium height and well proportioned. . . Her hair was blond, and her eyes were azure blue. Her nose aquiline but exquisitely formed, her mouth small and vermilion red; her teeth exceedingly beautiful—in sum, her face was sheer perfection!"⁵⁵

Others, however, expressed some reservations, describing her as "[a] consummate beauty and yet, somehow, for some reason, not entirely appealing."⁵⁶ Motivated by her ambition and high aspirations, Françoise Athénaïs soon set her eyes on Louis XIV: "She had designs on the King's heart, and started laying her plans from the day she came to court,"⁵⁷ as another courtesan noted. As a matter of fact, she was not exceptional because "every woman in the realm was born with the ambition to become the King's mistress!"⁵⁸

However, in 1663, Françoise Athénaïs agreed to marry Louis Henri de Pardaillan de Gondrin, Marquis de Montespan, who was the younger brother of her previous fiancé, who had tragically died in a

54. MOSSIKER, *supra* note 12, at 39. See also JEAN-CHRISTIAN PETITFILS, *MADAME DE MONTESPAN*, (1988).

55. PRIMI VISCONTI, *MEMOIRS SUR LA COUR DE LOUIS XIV*, Paris 2009.

56. MOSSIKER, *supra* note 12, at 42.

57. *Id.* at 45.

58. VISCONTI, *supra* note 55.

duel the year before. The groom was actually unable to bring any fortune or prestige to his bride. Of noble and ancient lineage, the Montespan family owned numerous estates and castles throughout the outskirts of the French countryside, but the revenues from the lands were insufficient to afford the maintenance costs of the properties and support the extravagant lifestyle of the Montespan.⁵⁹ Therefore, the newlywed couple was soon burdened by the Marquis's debts, including promissory notes as well as pledges on jewelry and other assets to secure the mortgages at exorbitant interest rates. The marriage eventually fell apart after the birth of their second child.

Deluded by the lack of ambition and the churlishness of her husband, Françoise Athénaïs de Montespan longed to return to the royal house and attain her previous goals. When in 1665, she was finally summoned to court again as one of the ladies in waiting to the Queen, Marie Thérèse, she left her family behind without much regret. As soon as she arrived at court, her singular focus was to gain the attention of the young monarch, Louis XIV, at first with little success though. Primi Visconti, indeed, recounted that

[b]eautiful as she was, and witty, quick at repartee and banter, she had not at first appealed to the King. He even went to so far, one day, at table with Monsier his brother, as to jest about her efforts to attract him. "She tries hard," he is supposed to have said, "but I am not interested."⁶⁰

Similarly, another courtesan later recounted: "The King couldn't stand Mme de Montespan, at first, and reproached Monsieur and the Queen for keeping her constantly in their company, although later on he fell madly in love with the lady."⁶¹

Indeed, within only one year upon her return to court, Françoise Athénaïs de Montespan's strong ambition was appeased. She managed to gain Louis XIV's affections, by availing herself of the concurrent pregnancies of both the Queen and his favorite paramour, Louise de La Vallière. Her acute strategy to conquer the King was reported by another courtier, the Marquis de La Fare:

Mme de Montespan had begun to think about him and was shrewd enough to do two things at the same time: first, she gave the Queen an extraordinary impression of her virtuousness by taking Communion in her company every week; secondly, she insinuated herself so successfully into the good graces of La Vallière that she was con-

59. MOSSIKER, *supra* note 12, at 47.

60. VISCONTI, *supra* note 55.

61. MOSSIKER, *supra* note 12, at 50.

stantly to be seen in her company. By these means, she contrived to be constantly in the King's immediate entourage, and she exerted every effort to please him, in which she succeeded very well, being bountifully endowed with wit and charm, in contrast to La Vallière, who was sadly lacking in these qualities.⁶²

By the end of 1666, the Duc D'Enghien, Prince of the Condé family, reported by letter to the Queen of Poland that "[the King] has apparently taken a fancy to [Madame de Montespan] and, to tell the truth, she would well merit such an interest, for it is impossible to have more wit and beauty than she!"⁶³

The first adulterous encounter between Louis XIV and the Marquise de Montespan occurred during an expedition to the battlefields in Flanders against the precepts of Françoise Athénaïs's catholic education and practice. Their passionate relationship unfolded rapidly as the King began to visit "Mme de Montespan, every day . . . in private, going to see her in her room which was located directly above the Queen's."⁶⁴ Another courtesan reported that Louis XIV "was in remarkable high spirits," and that Madame de Montespan "was the gayest company imaginable when she went out driving with the royal pair . . . constantly bantering and laughing with the King."⁶⁵ Meanwhile, after several regrettable attempts to gain financial benefits from the relationship between the King and Françoise Athénaïs, the Marquis de Montespan, was ultimately confined to his estates in the countryside, far from the royal court and the company of his wife.

Their separation was finally regularized in 1670, when Madame de Montespan petitioned the Chatelet Court of Paris to obtain "separate maintenance" and domicile from her husband as well as "to recover her dowry from out of community property holdings—on the grounds of cruelty and improvidence."⁶⁶ The Court ruled in favor of the Marquise de Montespan, ordering her husband to return the dowry and pay his wife an annual alimony. In practice, though, having legally obtained her freedom, the Marquise arranged that both the dowry and the alimony were to be secured for their children. Indeed, contemporary accounts reported that

[i]t had never been her intention . . . in this separation which she had sought, to bring about the ruin of the house of . . . her husband; nor

62. MARQUIS DE LA FARE, *MÉMOIRES ET REFLEXIONS SUR LES PRINCIPAUX EVÉNEMENTS DU RÉGNE DE LOUIS XIV* (Paris, 1884).

63. MOSSIKER, *supra* note 12, at 53.

64. *Id.* at 63.

65. *Id.* at 64.

66. *Id.* at 85.

to prejudice the interests of their children. On the contrary, she desired to contribute insofar as possible to the luster of the house of Montespan, and to ensure that the education of the aforementioned children be of a standard consistent with their rank and station.⁶⁷

However, neither of their children saw much of their mother. Indeed, her daughter died at only ten years old, and her son lamented having never had the pleasure to see his mother until he was fourteen.

On the other hand, during her long liaison with Louis XIV, she bore him eight children, who were legitimized and, hence, integrated into the royal lineage. Acting as an enlightened patroness of the arts and surrounding herself with her protégés, among them Racine, Molière, and La Fontaine, Françoise Athénaïs de Montespan gained so much influence and respect at the royal house that she was often referred to as “the King’s second wife,” or even “the real Queen of France.” Indeed, she was recognized by members of the French nobility to have “uncommon qualities, grandeur of soul and loftiness of spirit. . . . She thought beyond the present. . . . [and] considered the opinion of posterity, as well.”⁶⁸ In addition to her taste and passion for the arts, some contemporaries argued that Madame de Montespan had the fervent ambition to govern and exercise political influence in the affairs of the monarchy.⁶⁹

In 1671, Louise de La Vallière, who remained, at least nominally, the “Favorite” mistress of the King, fell inexplicably ill. Regaining consciousness after a few days, she opened her eyes and saw by her bedside “doctors on one side . . . priests on the other; the ones, despairing of [her] life; the others, of [her] soul.”⁷⁰ She was believed to have been mysteriously poisoned. Two sorcerers, who were on trial at that time before the court of Chatelet, indicated that Françoise Athénaïs de Montespan was responsible for the crime. The case was never made public, and any suspicion on the Marquise de Montespan was rapidly dismissed and forgotten. However, after the successful prosecution of the Marquise de Brinvilliers in 1676, who was held accountable for having ruthlessly poisoned her father and her two brothers, the practice of poisoning was finally acknowledged to be a deadly tool widely employed by the high-ranking society, and, thus, a clear threat to the security of the royal family. Indeed, during her trial, the Marquise de Brinvilliers revealed that “[h]alf the people I know—people of quali-

67. *Id.* at 93.

68. *Id.* at 97.

69. 10 MÉMOIRES DE SAINT SIMON (Paris, Librairie Hachette et Cie. 1893).

70. *Id.* at 81.

ty—are involved in this same kind of thing . . . and I could drag them all down along with me, should I decide to talk.”⁷¹

After the decapitation of the Marquise de Brinvilliers, many arrests for the same crime followed one after the other. Among the prisoners doomed to capital punishment was the sorceress La Voisin. During her trial, she revealed that many of her clients belonged to the upper echelons of the French nobility. Upon her death, other witches who were imprisoned at Vincennes, and particularly, her daughter, Marie Montvoisin, claimed that Françoise Athénaïs de Montespan had regularly visited La Voisin to purchase her “magic powders.” Marie Montvoisin explicitly accused the Marquise de Montespan of having used such potions to retain the King’s love, recalling that “[e]very time . . . she feared the good graces of the king were diminishing, she advised my mother of it so she could bring a remedy. My mother therefore said Masses over these powders destined for the King. They were powders for love.”⁷²

Marie Montvoisin further accused Françoise Athénaïs de Montespan of having participated in the black Masses held in 1667 and 1668 intended to invoke Satan’s help to obtain the King’s favor and affection. She reported that three to four newborn infants had been sacrificed on behalf of the Marquise de Montespan’s demands. The priest who had performed the Masses, who was also imprisoned, confirmed such accusations, recounting that, during the black ceremonies, the Marquise de Montespan recited the following:

I ask for the friendship of the King . . . [and] that the Queen should be sterile and that the King should leave her table and her bed for me; that I should obtain of him all that I ask for myself . . . ; that the King should leave La Vallière and look at her no more, and that, the Queen being repudiated, I can marry the King.⁷³

Further allegations that the Marquise de Montespan had conspired to poison Louis XIV were also made. However, the *Chambre Ardente* never conclusively ruled on the direct involvement of Françoise Athénaïs de Montespan in the Affair of the Poisons. In 1691, no longer a favorite of the King, she retired to the convent of the *Filles de Saint Joseph* in Paris, where she lived out her final years in solitude and pain. The Marquise de Montespan died in 1707 taking the unsolved mysteries with her.

71. MOSSIKER, *supra* note 12, at 145.

72. LISA HILTON, *ATHÉNAÏS: THE LIFE OF LOUIS XIV’S MISTRESS, THE REAL QUEEN OF FRANCE* 205 (2002).

73. *Id.* at 208.

V. POISONS, BLACK MAGIC, AND WOMEN'S AGENCY

The art of the poisons was believed to have originated in Italy and then emigrated to France. Allegedly, when Caterina de Medici married King Henry II of France in 1533, she brought the Italian Renaissance pharmacopoeia of venoms and necromancy to her new realm.⁷⁴ Apparently, during her reign, she further encouraged the study and practice of occult sciences and black magic, supporting astrologers, necromancers, and researchers in toxicology. Due to the difficulties to detect venous substances in cadavers during autopsy, at that time, poisons represented a frightening lethal tool that surpassed common human knowledge and circumvented existing legal remedies. The impossibility of determining satisfactorily whether poison was the cause of death meant that many crimes went unpunished and culpable poisoners enjoyed immunity.

For instance, with arsenic, the most common poison used during the sixteenth and seventeenth centuries, which was described as white as sugar, flavorless, and odorless, "the poisoner could avoid arousing suspicion in the naïve medical faculty, and the victim was usually declared to have succumbed to a wasting illness."⁷⁵ The other common poison at the time was "acqua toffana" or "eau de cymbalaire," a simple variation of arsenic with the addition of cantharides saturated with alcohol.⁷⁶ Labeled as rat poison, arsenic was very easy to buy in any French grocery store. As a powder, it was administered with food, mixed with sauces and other condiments. As a liquid—its far more toxic form—it was instead infused in wine.⁷⁷

The venous potions used in France during the sixteenth and seventeenth centuries were essentially prepared by killing an animal with a dose of arsenic and distilling its liquids, thus combining the virulence of the poison with the putrefied compounds of the carcass. Under torture, the Marquise de Brinvilliers also confessed to having manufactured her drugs with arsenic, sulfuric acid, and liquids from decomposed animal remains. A diagnosis of the symptoms of poisoning eluded the contemporary medical knowledge. Indeed, the famous surgeon Jean Devaux admitted, "[t]he method of guarding oneself from being poisoned is very difficult to state. The wicked poisoners and per-

74. MOSSIKER, *supra* note 12, at 133. See also STOKES, *supra* note 1, at 118.

75. MOSSIKER, *supra* note 12, at 134.

76. STOKES, *supra* note 1, at 121.

77. *Id.* at 122.

fumers, who secretly manufacture the poisons, carry on their betrayals and crimes so subtly that they deceive the most expert men.”⁷⁸

At that time, the only way to investigate whether the victim had been poisoned or not was to administer the residues of the suspicious food and drink to a bird or other domestic animal.⁷⁹ The death of the beast was taken to be conclusive evidence that the crime had been committed by the suspect. Alternatively, if the beast did not succumb, the investigation of the case was dropped. The lack of knowledge about toxic substances and their effects was also due to the reticence of doctors and scientists to divulge information related to the preparation of venous potions used in previous centuries. The famous French surgeon Ambroise Paré in fact declared, “I do not wish to put my hand to the pen to write about them in order to assist the malicious intent of traitors, of the wicked generally, of perfumers, executioners, and poisoners.”⁸⁰

Sorcerers and magicians who manufactured venous potions lived primarily in the suburbs of Paris, thereby escaping government control and law enforcement. Such communities, including that of Ville-Nueve, where La Voisin resided, enjoyed affordable houses with walled backyards, where their residents could operate undisturbed.⁸¹ However, their fame and poisonous activities were well known to their peers, neighbors as well as courtiers and distinguished members of Parisian society. In fact, the interrogations conducted by La Reynie revealed how interconnected and powerful poisoners, necromancers, and sorceresses were. They relied on one another for their supply of venoms as well as for client referrals, depending on whether customers required poisons, love powders, or other kinds of services, like abortion. They seemed to run their businesses quite professionally, demanding that their clients signed receipts promising payment in return for their services.⁸²

In order to add incantation or evil spells to their potions and request supernatural favors for their customers, sorceresses hired priests to celebrate magical rituals or black masses. For instance, as the daughter of La Voisin testified, Madame de Montespan also participated in sacrilegious masses to retain the graces of the King or cast diabol-

78. *Id.* at 123.

79. MOSSIKER, *supra* note 12, at 134.

80. STOKES, *supra* note 1, at 117.

81. WOOD MOLLENAUER, *supra* note 22, at 72.

82. *Id.* at 73.

ic spells on her rivals. In her interrogations, contained in the notebook of La Reynie, she gave a detailed description of some of these ceremonies:

An altar had been set up in my mother's bedroom . . . the cross in place, the candles lit . . . A lady was stretched out, stark naked, on a mattress, her legs dangling off one end of it, her head hanging down on the other, propped up on a pillow which had been placed on an upended chair . . . A linen cloth was folded on her stomach . . . the chalice reposed on her groin . . . Madame de Montespan arrived at ten in evening, and did not leave until midnight . . . At [another] one of Madame de Montespan's Masses, I saw my mother bring in an infant . . . obviously premature . . . and place it in a basin over which [the priest] slit its throat, draining the blood into the chalice . . . where he consecrated the blood and the wafer . . . speaking the names of Madame de Montespan and the King at the moment of the offertory . . . The body of the infant was incinerated in the garden oven, and the entrails taken the next day by my mother . . . for distillation, along with the blood and the consecrated Host . . . all of which was then poured into a glass vial which Madame de Montespan came by, later, to pick up and take away.⁸³

To be sure, black masses represented unorthodox deviations from the practices and sacraments of the Catholic Church. Obviously, the distinctions between witchcraft, superstition, and religious doctrines were still very confused during the seventeenth century in France.⁸⁴ For instance, sorceresses and magicians used crosses and amulets to protect themselves and to ensure the health and prosperity of their clients. According to their magical manuals, religious formulas had to be invoked to assure safety and to escape punishment. Sorceresses taught similar invocations calling upon the power of holy spirits for auspices and victory to their own customers.

The coexistence of both the sacred and the profane in such formulas reveals how blurred the distinction between religious and superstitious practices was at the time. To be sure, the Catholic Church had already campaigned against the sin of superstition and idolatry in the fifteenth century, identifying magical practices, fetish ornaments and fortune-telling cards as forms and objects of desecration. Catholic theologians warned that "those who give credit to dreams, divination, fortune-telling, and such superstitious illusions" were acting in breach of the law of God.⁸⁵ Thus, under the Church's commandment "those who are involved with magic and divination or who place their trust in di-

83. MOSSIKER, *supra* note 12, at 233-234.

84. WOOD MOLLENAUER, *supra* note 22, at 77.

85. *Id.* at 79.

viners commit a horrible crime and are excommunicated.”⁸⁶ On the other hand, the Affair of the Poisons represented a secular effort to eradicate the French magic underworld that intended to corrupt and destroy Christianity.

As a matter of fact, at the time, women often resorted to poisons, love powders, and black magic to put an end to domestic abuse and financial dependence. The physical and verbal assaults perpetrated against spouses were often hidden behind closed doors and by the privacy accorded to family matters. Violence against women and children was regularly employed by men in the household to control them and correct their faults. Since the fifth century in Europe, harsh punishment and severe reprisals were encouraged either “by word or blow” to any disobedient spouse to re-establish domestic peace.⁸⁷ Spousal correction was not to be performed based on the love of power, but rather as a supreme sense of duty. Intertwined with the feudal doctrine of *coverture*,⁸⁸ which restricted women’s legal and economic agency under the protection and cover of their husbands, spousal correction eventually encompassed intimate abuse and an imbalance in gender relationships.

Thus, many women used love magic to obtain financial security and “to have in plain power sure, the spirit, the heart, and the goods”⁸⁹ of their husbands. Love potions were often a combination of menstrual blood, the aphrodisiac Spanish fly and natural herbs, like verbena. If the love spells turned out to be inadequate to achieve their goals, women subsequently resorted to venous potions and black rituals. Some of them aimed at remarrying for love, being aware that a second marriage could not be celebrated without ending the previous one. Even for female members of aristocracy and wealthy powerful families, the chances of being granted a divorce were very slim. Moreover, even if women were accorded a divorce, they typically would have been forbidden to marry again.⁹⁰

Therefore, poisoning their husbands seemed to be a viable way for women to end unhappy and abusive marriages as well as to regain

86. *Id.*

87. ESTELLE B. FREEDMAN, NO TURNING BACK, THE HISTORY OF FEMINISM AND THE FUTURE OF WOMEN 293 (2002) (citing SAINT AUGUSTINE, 2 THE CITY OF GOD 325 (Marcus Dods ed., Edinburgh, T. & T. Clark 1871)).

88. BONNIE ANDERSON & JUDITH ZINSSER, 1 A HISTORY OF THEIR OWN: WOMEN IN EUROPE FROM PREHISTORY TO PRESENT 338 (1988).

89. WOOD MOLLENAUER, *supra* note 22, at 86.

90. *Id.* at 90.

control of household finances and patrimonies. Considering the unequal and subservient conditions women endured during the seventeenth century in France, both legally and financially, it is not surprising that poison became a weapon that was widely employed to exercise their agency against paternal and spousal authority and abuse. In such a scenario, the Affair of Poisons ultimately unveiled the French underworld of sacrilegious magic, premeditated crimes of passion and women's resistance to patriarchy and social subordination.

CONCLUSION

The investigation of the Affair of the Poisons uncovered a magical underworld in the royal court of Louis XIV and, more generally, in the French aristocracy during the seventeenth century. This article has presented an analysis of the scandal by examining the lives, marriages, trial documents and the different motivations of the Marquise de Brinvilliers, La Voisin, and Madame de Montespan to use poisons and engage in criminal activities, respectively.

The article also investigated the French legal system's responses to such crimes based on the class and social rank of the women implicated in the commerce of the poisons and black magic. Finally, the article reflects on what the Affair of the Poisons ultimately meant in terms of the defects of the French monarchy, the tensions within its body politic, the decadence of the customs and morals of Catholicism, and the decisions women made to engage in poisoning as a means of resisting patriarchy, domestic abuse, and financial and legal subordination.