

Death of a Political Informer. Camillo Volta - Roman Agent of Louis de Gonzague Duc de Nevers.

Notes on work in progress.

Recent studies have focussed on reconstructing the history of information in sixteenth and seventeenth-century Italy.¹ Some scholars linger on the phenomenon of the exchange of news and the emergence of newspapers, while others analyse the relationship between informers and their addressees. In general, the production of information in the form of *avvisi* or *gazette* is seen as a process going upwards in the social hierarchy, in that people of lower rank, including members of lower nobility, provide news, either military or political, or related to daily life, for the benefit of the higher ranks who were involved in political or military affairs.² Among the centres under scrutiny, Venice and Rome have been selected as particularly important for their central role in the balance of power in Italy, and relevant differences among the two centres have been pointed out. In particular, Mario Infelise explained how the production of information in Rome followed the politics of the factions in the papal Curia, whereas in Venice the production of news was a market driven activity.³

My research is part of work in progress that aims to reconstruct the network of political informers of one of the most important figures in the French Wars of Religion, Louis de Gonzague Duc de Nevers (1539-1595). In this short piece, I shall comment on some documents that show the danger of transmitting information in late sixteenth-century Rome, under the papacy of Sixtus V, Felice Peretti da Montalto (1520-1590). So far, I have been able to piece together the correspondence of just a few of the political informers of the Duc de Nevers, and I have been particularly interested in the case of Camillo Volta, a Bolognese gentleman who, as we shall see, paid with his life his service as political informer of the Duc de Nevers, when Pope Sixtus V had him arrested and sentenced to death, between September and October 1589. Although we do not have the documents clarifying Sixtus' reasons for this, in this article I shall argue that the leaking of politically sensitive information to the French protestant party was the main reason for Volta's death.

* I am grateful to Camilla Russell, Filippo De Vivo, and Mario Infelise for their comments on previous drafts of this article. Translations from the Italian are mine.

¹ Elena Fasano Guarini & Mario Rosa (eds), *L'informazione politica in Italia (secoli XVI-XVIII), Proceedings of the Seminar at the Scuola Normale Superiore, Pisa* (Pisa, Scuola Normale Superiore, 2001); Mario Infelise, *Prima dei giornali. Alle origini della pubblica informazione* (Bari: Laterza, 2002); Filippo De Vivo, *Information and Communication in Venice. Rethinking Early-Modern Politics* (Oxford: OUP, 2007).

² Particularly relevant are: Infelise, *Prima dei giornali*, chapter three; Giampiero Brunelli, 'Canali di informazione politica degli Orsini di Bracciano', *L'informazione politica in Italia*, 281-303; and Brian Richardson, 'A Scribal Publisher of Political Information: Francesco Marcaldi', *Italian Studies*, 64 2 (2009), 296-313.

³ Mario Infelise, 'Roman *avvisi*: Information and Politics in the seventeenth Century' in G. Signorotto & M. A. Visceglia (eds) *Court and Politics in Papal Rome 1492-1700*, (Cambridge University Press, 2002), 212-228, 221, and Infelise, *Prima dei giornali*, 32-33.

During a preliminary overview, I was able to assess that the amount of primary sources on the network of Nevers' informers is quite substantial. Most letters sent and received by the Duke are in the Bibliothèque Nationale in Paris, whereas documents mainly relating to the Duc de Nevers' contacts with the Gonzague family can be found in the State archive in Mantua. In terms of scholarship on Louis de Gonzague, critical works are relatively recent. Gino Benzoni's biography of Gonzague⁴ provided the first comprehensive assessment of the historical *persona* of the duke, and the role he played in late sixteenth-century France, plus substantial critical bibliography. A more recent, major work by Ariane Boltanski concentrated on the study of the creation, maintenance, and development of Gonzague's household in Nevers, and on his role during the Wars of Religion.⁵ Before the above mentioned contributions, Michael Wolfe's thorough research reconstructed the tormented months the duke spent when deciding whether to rally with the Protestant Henri de Navarre, or against him.⁶ In the dramatic months following the death of King Henri III in August 1589, the French nobility craved for news in order to assess whether to support the Catholic successor to the throne Charles Cardinal de Bourbon, or whether to back Henri de Navarre, or, as a third choice, remain uncommitted to one party or the other. Some, and among those was the Duc de Nevers, opted for withdrawal at a certain point of the struggle that was ravaging France. Born a Catholic, and profoundly devoted to the French Crown, at first Louis de Gonzague could not accept a Protestant king: 'for him the accession of the Protestant Henri IV had transformed the question of political loyalty into a matter of conscience.'⁷

As I have said, Nevers relied on a well-structured network of informers, both in France and in Italy. As for the Italian side, Boltanski provides plenty of information on the structure of Nevers' household, and the origin of its members. It was a typical feature of the house of Gonzague-Nevers to use Italian agents to follow the Duke's patrimonial and political affairs in the peninsula. Among those on Gonzague's payroll, there was the renowned man of letters Stefano Guazzo in Mantua, who would act as the agent informing the Duke about the family dispute over the inheritance, in particular with the Duke's brother Guglielmo, Duke of Mantua. Girolamo Barchino was in Milan, Arnolfini in Lyon,⁸ and Camillo Volta in Rome, while others delivered letters and writings.⁹ In the year 1589, among those who travelled between Rome and Paris occasionally collecting Volta's letters for the Duke and delivering

⁴ Gino Benzoni, 'Gonzaga, Ludovico', in *Dizionario biografico degli italiani*, vol. 57 (Rome: Istituto Treccani, 2001), now also available online:

⁵ Ariane Boltanski, *Les ducs de Nevers et l'état royal: genèse d'un compromis (ca 1550 - ca 1600)* (Geneve: Droz, 2006)

⁶ Michael Wolfe, 'Piety and political allegiance: the Duc de Nevers and the Protestant Henri IV, 1589-1593', *French History* 2, 1 (1988), 1-21.

⁷ Wolfe, 'Piety and political allegiance', 12

⁸ Bibliothèque Nationale de France (hereafter B. N. F.), Mss Fr. 4700, fols 55-58,

⁹ B.N.F., Mss Fr. 3416, fols 15-16, Mss Fr. 3421, fol. 44, Mss Fr. 4689, fols 3-159, Mss Fr. 4690, fols 11-120, Mss Fr. 4692, fols 92-100, Mss Fr. 4687, fol. 89,

the Duke's letters to Volta, was Giovanni Maria Manelli from Forlì,¹⁰ the secretary of an important figure in late sixteenth-century France, Cardinal Pierre Gondi (1532-1616). In Rome, Manelli was also on the payroll of Virginio Orsini, Duke of Bracciano (1572-1615).¹¹ In the meantime, Manelli updated the Duc de Nevers with military news at the border with Piedmont, where he had been arrested in Spring 1589 on his way to France, confined for three months, and released only after the death of the King of France, having had all his letters confiscated. The name of Camillo Volta crops up in Manelli's letter to the Duke:

I had a very pleasant journey to Rome and with my usual faithfulness and diligence I delivered the letters of Your Excellence to Signor Camillo Volta, and I was received by Our Lord [The Pope] with all kindness. Not only did he deal favourably with the questions of the Cardinal, my patron, but he also ordered me to carry out some negotiation. This made me leave Rome in such haste, that I aroused the suspicion of one of the parties, that, as I believe, later kept me for three months in Savoy in the fortress of Monmeliano. This was done more as a precaution rather than because they found in either letters or writings anything that may displease someone. Among the letters, the one from Your Excellence suffered the same fate as that of other great princes. My reasons were that I was captured in a country where I had never been under any suspicion, and that I had begged all those who were giving me letters, not to say anything that should not be seen. Which, as I can see, the above-mentioned signor Camillo carried out very well, and I humbly beg Your Excellence to believe this reason, which my sincere judgement deserves, as well as the devotion that I bring to Your service. After the death of the King, the most serene Duke of Savoy agreed to release me and showed towards me every kind of affection and apology towards my illustrious patron.¹²

¹⁰ A first account of Manelli's biography in Simone Testa, 'Did Giovanni Maria Manelli Publish the *Thesoro politico* (1589)', *Renaissance Studies* 19, 3 (2005), 380-94.

¹¹ This person is not listed among the informers of the Orsinis in Brunelli, 'Canali di informazione politica'.

¹² B.N.F., Mss 3421, fols 33r-v: 'Io hebbi assai felice viaggio nell'andar a Roma et ricapitai con la debita fedeltà, et diligenza le lettere dell'Ecc[elle]nza V[ost]ra al sig[no]r Camillo Volta, et fui da N[ostro] S[igno]re ricevuto con ogni maggior benignità, et non solo favorevolm[ent]e espedito circa le dimande del s[igno]r Card[ina]le mio p[ad]rone; ma S[ua] S[antità] mi comandò ancora qualche neg[oti]o. Che mi fece partir di Roma con tanta prestezza, che diedi sospetto a una delle parti, che come credo mi ha poi fatto ritenere tre mesi in Savoia nella fortezza di Monmeliano et ciò piutosto a cautela, che per haver trovato nelle mie lettere et scritture cosa che debba dispiacere ad alcuno, et fra l'altre l[ette]re, l'inclusa dell'Ecc[ellen]za V[ost]ra ha corso la medesima fortuna che quella di molti altri gran P[ri]ncipi, et per mia scusa adduco l'esser stato preso in un stato, dove non hebbi mai alcun sospetto, et l'haver pregato tutti quelli, che mi davano l[ette]re a non mettermi cosa, che non potesse essere vista. Il che come ved[o?] ha benissimo eseguito il sud[detto] s[igno]r Camillo, et io supplico hum[ilmente] l'E[ccellen]za Vostra di questa iscusatione che merita la mia retta mente e la divotione che porto al suo servitio. Il Ser[enissimo] Duca di Savoya si è poi contentato doppo la morte del Re di rilassar mi, usando verso di me ogni sorte di amorevole dimostrati[on]e e scusa verso l'ill[ustri]ssimo mio padrone.' Manelli's arrest is confirmed in B.N.F., Mss Fr. 5045, *Relation, en Italien des événements de France, 1589*, fol 191v, which can be dated around the spring of 1589. Another

Camillo Volta¹³ had been the agent to the Duc de Nevers in Rome for more than twenty years, and was well connected in the Roman court. He was born in 1552 of a noble family: Volta, Della Volta, or Dalla Volta, by tradition a member of the network of families which backed the French party, against the Habsburgs and the papacy.¹⁴ Camillo's father, Count Astorre, was Senator, Captain of Infantry, and member of the 'Dieci della Guerra' (Ten of War), as well as being the chief, the Gran Maestro, of the military order called Cavalieri Gaudenti (or Jovial Knights).¹⁵ He owned several lands in the southwestern part of Bologna's province until Pope Clement VII confiscated them in 1532. On his mother's side, Camillo's cousin was the influential Cardinal Gabriele Paleotti.¹⁶ In 1560, Astorre left the title of 'Gran Maestro dei Cavalieri Gaudenti' plus several possessions to his son, who became the last Gran Maestro of the order. The origin of Camillo's relationship with the Duc de Nevers is not known, but Cardinal Scipione Gonzaga (1542-1593), another of Volta's correspondents, called him the 'legal agent' of the Duc de Nevers in Rome.¹⁷ At the moment it is not possible to establish whether Volta had any material interest in the relationship with Nevers; however, Nevers was ready to help when Mario, Camillo's son, turned to him for protection following his father's execution, a confirmation of the tradition of a network of patronage that was perpetuated and transmitted through the decades.¹⁸

In the next section, I shall concentrate on the correspondence from the last month of Volta's activity as informer of the Duc de Nevers, and on documents reporting the news of Volta's arrest and execution.

From their correspondence, I have selected just one letter, dated 6th September 1589, first, because it shows the style Volta adopted when writing to Nevers about the Pope's reaction to the death of the King of France, Henri III in August 1589, and second, because it was the last letter he ever wrote to Nevers. The final part of the document reads:

As for the rest, I have nothing to add to what I already said yesterday. Only, I left out that 27 is beside himself with pleasure for what happened to 4, because he feared a

confirmation of Manelli's arrest is in Matilde Enrica Brambilla, *Lodovico Gonzaga duca di Nevers* (Udine, 1905). None of the documents clarifies the reasons for Manelli's arrest.

¹³ Pompeo Scipione Dolfi, *Cronologia delle famiglie nobili di Bologna, con le loro insegne e nel fine i cimeri. Centuria prima. Con un breve discorso della medesima città* (Bologna: Giovanni Battista Ferroni, 1670), 716-7. On Camillo Volta see also Joseph Alexander Hübner, *The life and times of Sixtus V*, transl. E. H. Jerningham, 2 volumes (London: Longmans Green, 1872), vol. 2, 230, 241-43.

¹⁴ Head of the pro-French network of families in late Sixteenth-century Bologna were the Pepolis, see Andrea Gardi, *Lo stato in provincia. L'amministrazione della legazione pontificia durante il regno di Sisto V (1585-1590)* (Bologna: Istituto per la storia di Bologna, 1994), 242.

¹⁵ This military order had medieval origins (it was created in 1261), and was more formally called Milizia della Gloriosa e Beata Vergine Maria (Militia of the Glorious and Blessed Virgin Mary). See Domenico Maria Federici, *Istoria de' Cavalieri Gaudenti*, 2 vols (Venice: Coleti, 1787).

¹⁶ Paolo Prodi, *Il cardinale Gabriele Paleotti (1522-1597)*, 2 vols (Rome: 1959, 1967), II, 446.

¹⁷ Scipione Gonzaga, *Autobiografia*, ed. Dante Della Terza (Modena: Panini, 1987), 53, 70.

¹⁸ Boltanski, 177: 'le réseau structure autour de la maison ducal se distingue comme un monde du temps long, où les attachements se perpétuent et se transmettent de décennies en décennies...'

lot about what he could fear; in the meantime there is no decision. These S[ignor]i of the Congregation of Cardinals have decided, as Navarre's man is about to arrive, that he should be listened to, because the Spanish [cardinals] were demanding that he not be admitted.¹⁹

It is most probable that the Venetian ambassador Alberto Badoer referred to this letter in his dispatch to the Senate of the Serenissima, when giving the news about Volta's arrest, almost in shock at the absolute power exercised by Sixtus V:

On Thursday morning, while he was leaving home, Signor Camillo Volta agent of signor Duc de Nevers was arrested and conducted to Tor di Nona [the Roman prison]. It is said that some letters he was writing to his patron were intercepted, in which he allegedly said that cardinals and His Holiness himself showed great rejoicing at the death of the King [of France], along with other free words about this; but nothing else is known with certainty, apart from the fact that this gentleman is kept in a secret location, without anyone being allowed to speak to him.²⁰

On 5 December 1589, Edward Staffords' servant William Lily, sent the following letter to Sir Francis Walsingham, reporting what happened to Volta in September-October. As can be gathered, Lily showed interest on Volta's wealth and suggested that this might be a reason for his arrest and execution:

The Pope calling one Camillo Della Volta to him (a gentleman of Mantua) agent at Rome for the D[uke] Nyvers, and asking him somewhat about France, made answer to the Pope that his Holines shoulde finde himselfe much deceaved in the notion, and that he heard many falsities from France, whereunto the Pope founde himself much greaved, sent one p[rese]ntly to his chambre and fownd ther both lettres newly received of Instructions from Nyvers and a lettre to Nyvers of the disposition of the

¹⁹ We do not have the cipher for the Volta-Nevers exchange, and I assume 27 and 4 correspond to the Pope Sixtus V and Henri III King of France. B.N.F., Mss Fr. 3421, fols 44r-v, 9th September 1589: 'Nel resto non ho ch'aggiungere a quanto già dissi hieri, solo lasciai che 27 ha havuto tanto piacere di quanto è successo a 4 che non capisce in sé stesso, perché temeva molto di quello poteva temere, per ancor non ci è rresolutione alcuna, questi S[ignor]i della Congreg[atio]ne hanno rresolutione venendo l'huomo di Navarra, che s'habbi ad ascoltare, perché Spagnoli facevano instantia che non fussi ammesso.'

²⁰ Venice State Archive, Senate. Dispatches. Ambassadors, Rome. Filza 24: Alberto Badoer, 9 settembre, 1589, fol. 24r: 'Giovedì mattina il signor Camillo della Volta Agente del sig. Duca di Nevers nell'uscir di casa fu ritenuto et condotto in Torre di Nona, si dice per esserli state intercettate lettere, che scriveva al suo Padrone, nelle quali diceva li Card[ina]li, et Sua Santità stessa haver mostrato grande allegrezza della morte del re, con altre parole assai libere circa di questo; ma però non si sa con certezza altro di più, che l'essere tenuto questo gentil'huomo in loco molto secreto, senza che alcun li possa parlare.'

pope in thes affayres,²¹ for which and his confiscations (being ritche) his head was cut of, and hereuppon both Mantua and Nyvers wonderfully discontented²²

Indeed, Volta's properties tempted many persons. However, there is no evidence that Sixtus V acted the way he did in order to appropriate Volta's wealth to himself, as suggested by Lyly. Ghiselli's manuscript chronicle of Bologna informs how Giovan Battista Volta, eventually bought his brother's properties from the Pope.²³ Further documents show that Sixtus' harsh response was caused by Volta's freedom in speaking about the Pope's reaction to the death of the French King. In Volta's last will we can read more clues about the reason that sparked the Pope's decision. This was registered by the Confraternita di San Giovanni Decollato (Confraternity of Saint John Decollated), which was established in Rome in 1490, following Pope Innocent VIII's Bull²⁴ ordering the creation of a confraternity for the comfort of prisoners sentenced to death, during the last hours of their lives.²⁵

Volta left his last will to the members of the Confraternity on the night of 13th October 1589.²⁶ The prisoner acknowledged he had offended the Pope, and begged for his pardon. Also interesting to read is how determined Sixtus V was in carrying out the death sentence, and that all Volta's acquaintances in the high spheres were of no avail to him:

[Camillo Volta] begged pardon of all those he had offended, in particular to Our Lord Pope Sixtus [...] for offending and distressing him ... He also begs his most Illustrious cousin, Cardinal Paleotti, to thank all those gentlemen who strove to help him with Our Lord or others, and he regrets very much this mistake of his, for which he begs pardon [etc.]²⁷

²¹ The confiscation of writings was the standard procedure for those accused of writing news, see Jean Delumeau, *Vie économique et sociale de Rome dans la seconde moitié du XVI^e siècle*, vol. 1 (Paris: E. De Boccard, 1957), 31.

²² William Lyly to Walsingham; Document Ref.: SP 78/20 fol. 0222 Folio Numbers: fols 0222-Date: Dec. [5]/15 1589 Source Archive: The National Archives of the UK Gale Document Number: MC4313580221 *State Papers Online*.

²³ Antonio Francesco Ghiselli, *Memorie antiche manuscritte di Bologna*, Biblioteca Universitaria di Bologna: vol. XVIII (1585-1590), fols 703-704: 'It happened that Gio: Battista, Dottore, ex officer in Rome, brother of the unfortunate dead Camillo, once he paid a sum to the Apostolic Holy See, reobtained a good share of what had been confiscated.'

²⁴ See 'Approbatio confraternitatis sub invocatione S. Ioannis Baptistae Decollati', in *Bullarum diplomatum et privilegiorum sanctorum romanorum pontificum*. Taurinensis edition, ed. Collegii Adlecti Romae, vol. 5 (Augustae Taurinorum, 1860), 343-346.

²⁵ On the history of the Confraternity, see Jean S. Weisz, *Pittura e Misericordia. The Oratory of S. Giovanni Decollato in Rome* (Ann Arbor, Michigan, 1984).

²⁶ Rome, State Archive, *Archivio di San Giovanni Decollato*, Registro 14, busta 7, fols 158^v-160^v.

²⁷ Ibidem: 'chiese perdono a tutti quelli c'avess'offeso et in particolare a N[ostro] S[ignore] Papa Sisto [...] in quanto l'avessi offeso et dispiaciuto... si raccomanda all'Illustrissimo Cardinale Paleotto suo cugino che li piaccia rengratiare tutti quelli Signori si sono adoperati in suo servitio appresso di Nostro Signore o altri, dispiacendoli molto questo suo errore di che gliene chiede perdono [etc.]. Volta thanks the following for their attempts to intercede with the Pope on his behalf: his cousin Cardinal Camilo Paleotti, Cardinal Scipione Gonzaga, and his brother Giovan Battista Della Volta, governor of Rome, because he repeatedly paid him a visit in jail.

In my view, Volta's case should be considered within the context of the Popes' legislation against slanderers and writers of *avvisi*. The official denunciation of the problem related to people writing false news, started with Pius V's Bull issued on 17 March 1572, *Constitutio contra scribentes, exemplantes et dictantes monita vulgo dicta avvisi e ritorni*. The difficulty of limiting such a thriving market can be gathered from the threat of adopting even harsher measures as expressed in Gregory XIII's Bulla *Ea est, Constitutio contra famigeratores et menantes*, 1 September 1572, which enjoined those who received the news to denounce such news and hand it in to the Governor of Rome.²⁸ Sixtus V adopted the same attitude against news writers with his very harsh *Bando contra li calunniatori et detrattori della fama et honor d'altri in lettere d'Avvisi o altrimenti*, dated 12 October 1586.²⁹

Among others, the most famous victim of the papal edicts against writers of news was Don Annibale Cappello, priest, and agent of the Duke of Mantua in Rome. He was sentenced to death: but first he was brutally punished, when he had his tongue and right hand cut off, and finally was hanged on Ponte Sant'Angelo.³⁰

Cappello's case provides an interesting parallel, because the charges against him are similar to those moved against Volta, and, apart from the writing of *avvisi*, Cappello was accused of contacts with heretic princes to whom he allegedly leaked political information. In particular, Lord Arundell, and Mary Stuart, just before she was executed, advised Sixtus V of Cappello's contacts with Elizabeth I.³¹ This infuriated the pope, who accused cardinals of being those primarily responsible for leaking information to the *menante*.³²

Volta was not a writer of *avvisi*, or *menante* as such people were called in Rome; instead, he used these sources to keep his patron informed. Another difference with respect to Cappello's case was Volta's status as nobleman. It is for this reason that he was spared death by hanging, and was instead first beheaded in prison, and then had his body exposed in Ponte Sant'Angelo.

Without the papers relating to the charges against Camillo Volta,³³ we can only presume that the reasons that sparked Sixtus V's decision should be identified with the accusation of lèse-

²⁸ Salvatore Bongi, 'Le prime gazzette in Italia', *Nuova Antologia*, 9 (1896), 311-46, in particular 318-9.

²⁹ Delumeau, *Vie économique et sociale de Rome*, vol. 1, 30. The text of the *bando*, can be read in Cesare D'Onofrio, 'Gli avvisi di Roma dal 1554 al 1605', *Studi romani*, 10 (1962), 541-42, who uses the date 11 November 1586.

³⁰ Marina Giansante, 'Cappello, Annibale', in *Dizionario biografico degli italiani*, vol. 18 (1975), *ad vocem*.

³¹ Bongi, 'Le prime gazzette', 321.

³² Casimiro Tempesti, *Della vita e geste di Sisto V* (Rome: Remondini, 1754), 306-07.

³³ On his way to France, Mario claimed to have the papers with him, see B. N. F., Mss Fr. 4698, coll. Bèthune, Nevers 25, anc. 9520, fol. 106, Mario Volta to the Duc de Nevers the last day of February 1590. However, I did not find any mention of either the sentence or the trial in Nevers' subsequent correspondence.

majesté. As it has been argued,³⁴ the precise nature of the crime of lese-majesté cannot be limited to one type of action only; it actually included several, and quite separate, forms of crime. In our case, the revelation of state secrets and the freedom with which Volta spoke about the Pope, should be considered the reason for the Pope's decision to charge the man with an accusation of conspiracy against the papacy, and links with the French Huguenot party, considered at the time an enemy of the Roman Church.³⁵

More research is required to track the papers relating to Volta's trial, and more documents must be uncovered in order to assess the damage that this sentence caused to the Duc de Nevers, and whether his relationship with Camillo's son Mario continued.

In conclusion, Volta's case brings more evidence on the following themes: Sixtus V's notorious determination to restore papal authority, and his fierce action to tame hostile nobility; the widespread need of information by protagonists of the political scene in a tormented period such as the late sixteenth-century; and how dangerous the spread of uncontrolled news was considered by authorities. Ultimately, Volta's case shows that the business of political information in the dramatic end of the century was dangerous also for rich and well-connected agents such as Volta. His violent end, however, sheds light on the process of circulating such information, and on the attempts of the papacy to regulate it. What we can see, is an intensely contested political sphere, over which none of main players - not the pope, the duke, or their informers - had complete control.

Simone Testa

Royal Holloway, University of London

³⁴ Mario Sbriccoli, Crimen laesae maiestatis: il problema del reato politico alle soglie della scienza penalistica moderna (Milan: Giuffrè, 1974), 332-38.

³⁵ For other cases of conspiracy in the Papal state, see Kate Lowe, 'The political crime of conspiracy in fifteenth and sixteenth-century Rome', in T. Dean and K. Lowe (eds), Crime, Society and the Law in Renaissance Italy (Cambridge, CUP, 1994), 184-203.