

**'A SUBJECT SO SHOCKING':
THE FEMALE SEX OFFENDER IN RICHARDSON'S *CLARISSA***

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The undersigned, appointed by the Dean of the Graduate School, have examined the thesis entitled

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Presented by Jennifer L. Albin

A candidate for the degree of Master of Arts

And hereby certify that in their opinion it is worthy of acceptance.

Professor Devoney Looser

Professor George Justice

Professor Theodore Koditschek

To Josh, who kept me fed physically and intellectually,
and Tuesday, who always kept my research warm...

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‘A SUBJECT SO SHOCKING’:
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ABSTRACT

Richardson’s *Clarissa* is notable for the shocking rape of its title character, but what is often critically overlooked about the plot is the presence of female accomplices during the crime. Clarissa’s recollection of the event is confused, but she notes with horror the participation of women during her rape. In my thesis, I examine the significance of Richardson’s use of women in this role through historical and literary analysis. My thesis utilizes court records from the Old Bailey Proceedings Online to explore the existence of historical rape cases involving female accomplices to shed light on Richardson’s use of the women in the novel. I also discuss the roles erotic literature and prostitution play in creating these characters.

I contend that the novel is ultimately about gender in relationship to power. Throughout the thesis, I examine authorship and the law’s roles in creating each character’s understanding of gender and how these perceptions affect the rape of Clarissa.

Introduction¹

When Clarissa finally recounts Lovelace's crime against her to Anna Howe, the details are still inchoate:

Thus was I tricked and deluded back by blacker hearts of my own sex than I thought there were in the world; who appeared to me to be persons of honour: and, when in his power, thus barbarously was I treated by this villainous man!

I was so senseless that I dare not aver that the horrid creatures of the house were personally aiding and abetting: but some visionary remembrances of female figures flitting, as I may say, before my sight; the wretched woman's particularly. But as the confused ideas might be owing to the terror I had conceived of the worse than masculine violence she had permitted to assume to me, for expressing my abhorrence of her house; and as what I suffered from his barbarity wants not that aggravation; I will say no more on a subject so shocking as this must ever be to my remembrance.²

In Clarissa's muddled account of the rape, one thing is evident. She is stunned that one of her own sex would aid Lovelace in his violent crime. The drugs confuse Clarissa's memory of the event, but she clearly recollects the presence of "the vilest of vile women."³ Although it is unclear if women other than Mrs. Sinclair were present during the actual rape, all of the women become implicated in the conspiracy against Clarissa.

The horror of the rape of the title character in *Clarissa* is only intensified by the participation of women in the crime. The involvement of a woman, at first, may seem unthinkable. The participation of females in rape crimes was not confined to the pages of Richardson's *Clarissa*, however. As historical evidence

shows, female accomplice rape occurred throughout eighteenth-century London, though it has been generally ignored by critics. Primary accounts of prostitution in the eighteenth and nineteenth centuries combined with research from the rape cases in the Old Bailey reveal a practice not only present in literature but in society as well.

This thesis will explore the development of gender identity and how it influences Richardson's prostitutes. I begin with an examination of power in the novel, including the balance of and struggle for power amongst the novel's characters, as well as an examination of Richardson's power as author. From there I investigate eighteenth-century rape law through a study of both the definitions of rape during the time as well as an understanding of the process of prosecution for rape. I will examine the prosecution process through both written law and actual court proceedings, leading from legal and etymological analysis into the role of prostitution in eighteenth-century society, literature, and the novel, *Clarissa*, itself. ⁴ Here I will examine historical accounts of bawds and prostitutes in comparison with the roles they play in the novel. Throughout the thesis I examine how constructions of gender identity from eighteenth-century writing, in particular erotic literature, influenced the pivotal scene in Richardson's novel.

A concise review of criticism on the subjects of Richardson and his main characters, Lovelace and Clarissa, may be useful. While each of these critiques is interesting in its own right, none fully examine the role the women play in Clarissa's rape and why their presence is necessary to the novel. There is a preoccupation with the power dynamic between Lovelace and Clarissa in most

accounts that simply does not permit the discussion of the women's roles in the crime. Despite this, previous critics' analysis and evaluations of these key characters has been influential on my understanding of these characters and their relationships to the women.

The most obvious place to begin a review of Richardson criticism is with Terry Eagleton's *The Rape of Clarissa*. Eagleton's unique blend of post-structural and psychoanalytic reading of class politics offers significant insight into Lovelace's and Clarissa's formation of gender through their writings. His understanding of how class politics, particularly the eighteenth-century bourgeois, play into the novel's use of language and sexuality is particularly useful for examining the role patriarchy plays in the rape of the novel's title character. Sexuality, according to Eagleton, "is the medium in which [class conflict] is conducted."⁵ Despite Eagleton's provocative thesis, he rarely engages in historical criticism beyond that of abstract cultural concepts such as patriarchy, aristocracy, and the middle class. Eagleton's readers are expected to comprehend the complex nature of the evolving class structure of eighteenth-century England if they are to follow his arguments regarding the nature of Richardson's lead characters. It is easy to see Lovelace as the embodiment of an unaccountable aristocracy in its death throes, but if this libertine character is being culturally murdered by the middle-class everyman, why do we have Willoughby sixty years later? Eagleton is certainly correct in his assumption of the role class politics play in the novel, but his post-structuralist critique limits this reading almost entirely to Lovelace and Clarissa and forgets to address how class concerns affect other important characters in the novel, such as Belford,

Anna, and Mrs. Sinclair. By attempting to address the significance of writing and reality to class understanding, Eagleton dismisses the importance of all but Lovelace and Clarissa's correspondences. While my thesis will address how patriarchy and class relations affect the novel's plot, the use of historical research into rape and prostitution clearly shows how we can understand these structures within the eighteenth century.

Understanding Richardson's role as author of the novel is also key in understanding the plot. Madeleine Kahn focuses primarily on Richardson's authorship, or lack thereof, of the two primary characters and how this affects our understanding of gender in the novel. Kahn debates Richardson's control over his authorship of the characters, drawing on his correspondence with readers about the novel to support her thesis that the epistolary format helps him avoid personal narrative identity within the novel.⁶ While Kahn discusses the main correspondents at length, she provides little insight into issues of Richardson's authorship of the novels' prostitutes. Rather than showing a lack of control over his characters, Richardson displays a keen awareness of the various class concerns his characters face and how this affects their perception of their own power and gender identity.

One critic does draw attention to the role Mrs. Sinclair and her whores play in the rape of Clarissa.⁷ Judith Wilt's hypothesis is that Lovelace's use of the phrase, "I can go no further," in his infamous letter to Belford suggests he could not complete the rape due to impotence and that the actual act was carried out by the women of the house.⁸ While an intriguing reading of the novel, Wilt's essay forgives Lovelace of his part in the crime and villainizes the women of the house.

Although their role in the crime should not be ignored, Wilt portrays them, quite literally, as the only culpable parties to the rape, referring to Sinclair's house as "there [where] woman is a harpy that feeds not only on the flesh of men but especially of innocent women."⁹ To Wilt, Lovelace himself is a victim of rape. She argues his first jilt "placed him in a painful relationship" with women forever.¹⁰ The article does not glorify Lovelace, but instead makes him out to be a puppet controlled by Sinclair and her women. I do not disagree with Wilt's argument about the culpability of women in the crime, but I do find troubling her distribution of the blame as well as her hypothesis that Lovelace does not physically rape Clarissa.

Wilt's thesis becomes hazy at points, alternately suggesting that the women committed the actual crime presumably with some sort of dildo since Lovelace's impotence prevents the actual act, and then later that Lovelace does commit the rape but that his phallus is only a tool of the women. Throughout Wilt draws on Lovelace's writing about the women to prove them to be evil. Though other readers might have a hard time trusting Lovelace as a character witness, Wilt does not and believes his claims that "these women" drive him to his crime. She seems conveniently to forget Lovelace's role in bringing Clarissa to the house and makes light of his treatment and seduction of the women of the house. Lovelace for Wilt becomes the true victim of the story. This reading ignores the implications of patriarchy and social class within the novel and focuses on finding evil within the characters. While I certainly see evil in their actions, I think we must not divorce the text from its historical context.

Indeed Wilt is not the only critic to lay blame at the feet of Sinclair. Robert A. Erikson discusses the characterization of Mrs. Sinclair at length in his book, *Mother Midnight: Birth, Sex, and Fate in Eighteenth-Century Fiction*.¹¹ While Erikson's focus is primarily on the role Mrs. Sinclair plays as Lovelace's "mother," it is clear his characterization implicates her in the crime against Clarissa. Victor J. Lams also touches on the women's role noting that Lovelace "becomes passive during the rape and transfers to Mrs. Sinclair and her women the brute physical force of the act."¹² Lams does not suggest that the women are the actual physical rapists as Wilt does, but he does agree with Wilt that Lovelace transfers the power to the women during the act.

Cultural and authorship studies have failed to explore adequately not only how Richardson imagined these women but also why they exist in the novel. To understand the accountability of the women for Clarissa's rape, we must first understand the definition of rape in eighteenth-century society and its relationship to pornography and prostitution. It is not simply enough to point the finger at these female villains; we must understand why they appear in the novel at all. If this novel were merely about rape, Lovelace could easily have physically overtaken Clarissa. This novel, however, is very much about gender identity within patriarchal institutions, and not just the identity of the two main players but that of all the novel's characters, particularly Lovelace's female accomplices. It is not enough, though, merely to condemn the gender identity of these women as more masculine than Lovelace or as "bestial womanhood."¹³ The identities of these women are more nuanced than that, more complex and problematic than demonstrating a mere polarization of gender. We must

understand the roles the law and society played in creating Richardson's perception of gender roles to understand how he wove together this novel's plot.

Understanding the role gender plays within the novel is essential to our understanding of Richardson's purpose for the prostitutes. Gender throughout *Clarissa* becomes associated with power and social status as each character struggles to maintain control over their sense of self. Understanding the power dynamics at play shows us how each character struggles to maintain control over their identity. Lovelace seeks power over Clarissa to establish himself as a superior masculine force above the influence of women. Likewise Clarissa struggles to maintain control over her own virtue and sense of self through her writing and self-analysis. As her family, Lovelace, and the women all threaten to force particular destinies upon her, Clarissa attempts to maintain power over her own life. Mrs. Sinclair uses power to achieve economic comfort. She is nonplussed by her deceptions of Clarissa, because they are the means to both retain Lovelace as a benefactor of her house and possibly to recruit Clarissa into her brood. Polly and Sally become increasingly concerned with establishing dominance over Clarissa. As Clarissa proves herself to be more virtuous than either of the women, they become obsessed with breaking her over her resistance and gaining power over her.

Rape can be seen as a result of the search for power in the novel. While I show how the women use rape in an attempt to gain control over Clarissa, I also show how rape was perceived by eighteenth-century society through historical records. By increasing our knowledge of rape law in the eighteenth-century, it becomes clearer why Richardson employed the crime in his plot. Richardson

shows rape to be a crime against the very soul of a woman in a way that it was not always seen in trial records. His treatment of the rape and Clarissa's response to it provides a perspective often ignored by society that is how it affects a woman physically, emotionally, and psychologically. At the same time, he presents us with female accomplices who appear unmoved by the plight of a fellow woman. Richardson implies, as I will show, that Polly and Sally may have even endured similar experiences. If this is indeed the case then we can see them as the binary of Clarissa and as the outcome of the crime against women with lesser senses of self. His treatment of rape in the novel, coupled with my historical research, shows how rape was perceived by English society. Richardson takes it a step further by attempting to show how the victim and the aggressor perceived rape.

His treatment of the prostitutes in the novel offers the reader significant insight into a vice Richardson clearly saw as an evil within his own society. While it would be easy to see the prostitutes as the true villains of the novel, their role is more complex than that. The ways in which Richardson chooses to represent the prostitutes shows an understanding of the intricate nature of prostitution within society. Richardson's characters are not flat stereotypes of harlots but women with intense and purposeful motivations. The women's actions show a concern with their own economic, social, and personal welfare. While the women certainly are pawns in Lovelace's games, they are playing along. They understand the nature of their place within society and how to make the most of it. Likewise historical accounts offer similar portrayals of women utilizing their sexuality and flexible morals for their own advancement.

The prostitutes' place in the novel thus becomes one of concealment and deception. We see them through the eyes of Lovelace and Clarissa, because it allows us to view them through the eyes of society. Although we may interpret their actions based on these secondhand accounts, the prostitutes will always remain somewhat ambiguous characters. Richardson uses them not only to give his story realism but also because they remain obscure characters that lend complexity to the reader's interpretation of the novel. Is he making a statement on societal issues? Undoubtedly. However, the way in which he allows the characters to remain in the background suggests that he understood a prostitute's place, and his readers' understanding of it, within his society.

Gender then becomes something even more difficult to understand. Why do these women act against a member of their own sex? How do they identify their own sense of gender identity? While historical record shows the need for prostitution likely led to the ruin of many innocent girls, this thesis sees their actions as a need to establish power within their own understanding of self. Identity becomes entangled with notions of control not only for the women but for Lovelace and Clarissa as well. Making this ultimately a novel about the struggle for power, particularly in terms of understanding one's own place and purpose. Gender is secondary to the need for control, but the relationship between sex and control makes the need to understand gender in the novel equally important.

Clarissa and the Pursuit of Power

Power is a key theme throughout *Clarissa*. The novel begins with a struggle for power between Clarissa and her parents, which eventually leads to Clarissa's flight from her home. While Clarissa is engaged in this struggle, she becomes entangled in a similar battle with Lovelace that will culminate in the novel's climactic crime. Throughout these struggles, it becomes apparent that each character is motivated by a quest for power. Clarissa desires a measure of control over her own circumstances, Lovelace searches for a way to overpower Clarissa's will, and Sinclair and her women hope to obtain domination over Clarissa's virtue. Samuel Richardson, on the other hand, exerts his power as author by depicting a vivid and realistic story of struggle, deception, and retribution. Throughout this chapter, I address the various forms of power at work in this novel. In the first section, I address authorship in relation to Richardson as well as within the novel. I then examine the dynamics of power in association with plotting and punishment with a particular focus on the search for power by the novel's women.

The Power of Authorship

Authorship throughout the novel is key in the pursuit of power. The very format of the book speaks to this effect. Both Lovelace and Clarissa utilize writing to maintain authority over their respective situations, and while this is a key point to discuss, we must also consider the power Richardson wields over the

novel as author. It is not a coincidence that the written word is the key to power in *Clarissa*, because its author was relying on that same power to take a marked stance on issues within his own society.

Throughout the novel, Clarissa corresponds with Anna Howe, despite being prohibited from doing so. Rather than heed her parents' wishes in the beginning or fear Lovelace's manipulations later, Clarissa chooses actively to disregard commands for her to stop writing and secretly continues her correspondence. Writing becomes an issue of control over her own life that she refuses to relinquish. This is particularly important because it is so easy to read Clarissa as totally subservient to patriarchal will and control. Even her flight from her parents' home is the product of a man's design upon her. Her writing, however, remains her avenue for self-expression and freedom.

This method of self-expression is of particular concern to Lovelace, because it is an arena of Clarissa's life that is out of his control. What passes between Clarissa and Anna in those letters is of vital importance to him, not only in terms of his plot against her but because Lovelace has an almost morbid need to know everything Clarissa thinks and feels. He goes so far as to waylay letters between the two and forge new ones to send in their place. This is yet another attempt on Lovelace's part to strip Clarissa of all of her power and gain total control over her. Lovelace's letters, on the other hand, are a means for him to flaunt his control over the situation. Whereas Clarissa's letters to Anna ask for guidance and support, Lovelace's letters to Belford act primarily as complaints or boasts about his plotting. His disregard of Belford's repeated pleas to abandon

his plot against Clarissa shows what little respect he holds for his supposed friend.

It would be quite easy to see these exchanges as embodying a world of their own. Indeed the use of epistolary style makes Clarissa and Lovelace and their circumstances seem rather too real. Madeleine Kahn suggests Richardson is “deliberately tapping the powers of the fictional world he could create but not control.”¹⁴ She repeatedly sounds the idea that Richardson “trusted his characters more than himself.”¹⁵ This, of course, is problematic. Authorial power is key to our understanding of the novel. As I have shown above, authorship is pivotal in defining self for both Clarissa and Lovelace. How then can we divorce authorship from defining Richardson? I believe we cannot.

While Richardson’s reliance on epistolary format allows the reader a certain flexibility of interpretation, it is clear Richardson understood the purpose of his work. In his preface, Richardson relates the advice and opinions he was offered regarding its structure and length. Richardson is careful to praise these suggestions while making it clear that he has no intentions of taking them: “But no two being of the same mind as to the parts which could be omitted, it was resolved to present the world the first two volumes by way of specimen.”¹⁶ The entirety of the work is seen as key to Richardson precisely because he understands the importance of even the most nuanced aspects of the story. Richardson is aware of how these intricate details allow him to create a story about gender, power, and identity within his own society. The structure of Clarissa is not, then, as others have suggested, lacking in authorial control but rather under Richardson’s complete control. So much so that he cannot

relinquish even minor editorial control to his readers. Kahn is right in her assertion that Richardson knows his characters best of all, and it is precisely for that reason that he holds so much power over his manuscript. Allowing others to assert their opinions and changes might affect the message he was attempting to relay. Kahn rightly points out that Richardson's claim that the novel warns parents against overly asserting their control and women against trying to reform rakes "does not even hint at the rich complexity and ambiguity of the novel itself."¹⁷ She sees this didactic breach as accidental, the product of Richardson's lack of control over the narrative. However, it seems rather very purposeful indeed when we stop to consider that this supposed lack of choices, and thus lack of editing, was very much within Richardson's control. Richardson chose to write a complex, ambiguous novel with a variety of characters, because he was attempting to capture reality in fiction.

The Power of Plotting

Throughout the book, Clarissa remains wary of Lovelace's female companions and their intentions, sensing something altogether awry in their behavior from moment to moment. Her refusal to take Miss Partington for a bedfellow signals she is aware of the danger of admitting a strange woman into her bedchamber. The control Clarissa exerts over her bedchamber in this scene is one of the few areas of power she has in Sinclair's house, at least in her mind. Although it appears Miss Partington was not involved in Lovelace's schemes, she responds vindictively to Clarissa's denial. It is Mrs. Sinclair who presses Clarissa to admit Miss Partington, and Lovelace seems genuinely surprised not only by the suggestion but the refusal as well. To Clarissa, he offers "to resent Mrs.

Sinclair's freedom."¹⁸ To Belford, however, he shows surprise and anger, asking "And now, dost thou not think that I owe my charmer some revenge for her cruelty in obliging such a fine young creature, and so cast a fortune, as Miss Partington?"¹⁹ Whether his search for revenge is fueled by Clarissa's actions or Miss Partington's statement regarding the affair is an important question. According to Lovelace, Miss Partington would be "willing to contribute to such a piece of justice" as a "*husband*" taking "possession of *his own*" after Clarissa's snub.²⁰ Clarissa's concerns are not without merit, and Lovelace is perfectly aware of this; however, Miss Partington's insinuation that Lovelace has a right to Clarissa is what he reacts to. Lovelace believes he has a right to rape Clarissa because the other women who surround him – Sinclair, Horton, Martin, Dorcas, and Partington – suggest he does. It is important to remember, though, that Miss Partington is responding to the information she has been given by Lovelace. In essence, Lovelace feeds her misinformation to ensure her opinion reflects that which he wishes to hear. In an attempt to justify his plot against Clarissa. While he is gratified by Miss Partington's suggestions of his right to Clarissa, he is still concerned with the power Clarissa exhibited in her refusal. When Clarissa attempts to control her surroundings, Lovelace is concerned over the power she exudes, because it not only weakens his plans but weakens him in the eyes of the other women.

As Clarissa continues to resist Lovelace's attempts, the ladies of the house become more involved in his plot against her. It is shocking enough to consider one of them breaching Clarissa's trust and admitting Lovelace in the night to her bedchamber, but as Lovelace continues to encounter obstacles to that plan, the

women offer not only increased assistance in his pursuit but find enjoyment in the contemplation of his crime as well. Lovelace tells Belford in Letter 226 that Sally and Polly, jealous of his attention to Clarissa, wish for her ruination:

After all what devils may one make of their sex? To what a height of- what shall I call it?-must those of it be arrived, who once loved a man with so much distinction as both Polly and Sally loved me, and yet can have got so much above the pangs of jealousy, so much above the mortifying reflections that arise from dividing and sharing with new objects, the affections of him they prefer to all others, as to wish for, and promote a competitorship in his love, and make their supreme delight consist in reducing others to their level. For thou canst not imagine how even Sally Martin rejoiced last night in the thought that the lady's hour was approaching.²¹

Even Lovelace shows some level of disgust with the women's interest in the destruction of Clarissa's virtue. What Lovelace does not seem to understand is that the women derive pleasure from exercising power over Clarissa. No longer are they the victims; they have become the aggressors. They are no longer ruined prostitutes but women in control of another woman. Lovelace, in a sense, has created monsters dependent on the perpetual destruction of others. It is vital to Sally's and Polly's sense of self to feel they hold control over another human being, because without this they are merely pawns in Lovelace's and Sinclair's plots.

In the end, Lovelace must call on the aid of two more women to help him in his ultimately successful attempt to have Clarissa. Lovelace knows Clarissa mistrusts all of the women associated with Sinclair and thus uses women pretending to be of Clarissa's own class. Lady Betty and Miss Montague play the roles given them by Lovelace with a precision that Clarissa is able to recognize in

hindsight, noting to Anna Howe, “She had her principal instructions from him, and those written down too, as I have reason to think [...] I once saw this Lady Betty [...] take out a paper from her stays, and look into it.”²² Despite this, Clarissa is unable to comprehend its meaning at the time, believing instead their intentions honorable. Not even when they give her drugged tea does she associate them with Lovelace’s plot. In fact, she calls out for them as she slips deeper into her stupor.

It is not until Sinclair appears to assist Lovelace in the rape that Clarissa understands what is happening, and as she suffers through the effects of the drugs for the days following, she begins to understand the roles the various women played in the plot. She doesn’t venture to presume all of the women of the house were involved, but as she recalls to Anna Howe: “I was so senseless that I dare not aver that the horrid creatures of the house were personally aiding and abetting: but some visionary remembrances I have of female figures flitting, as I may say, before my sight: the wretched woman’s particularly.”²³ In the days following the rape, Clarissa realizes the true nature of these women, commenting that “blackier hearts of my own sex, than I thought there were in the world” actually exist.²⁴ Although Clarissa is always aware of a difference in class and morality between her and Sinclair’s women, her fault is her inability to comprehend the lengths the women will go to exercise power over her.

The Power of Punishment

In the aftermath of the rape, we see Richardson’s attempt to actualize his novel in reality. In the chapter following this section, I discuss at greater length the legal information available to Richardson in writing his book; however, it is

important to consider power in relationship to punishment in terms of the novel itself. From the realistic way Richardson set up and wrote the crime against Clarissa and the subsequent actions of all parties, it is difficult to divorce fact from fiction. It is enlightening then to consider, in realistic terms, what considerations might have played on his characters when thinking of prosecution.

When Clarissa reveals to the women the truth about her relationship with Lovelace, she threatens them with prosecution for their role in the plotting. She also confronts them with their crimes, crying out, “And ye, vile women, who perhaps have been the ruin, body and soul, of hundreds of innocents (you show me *how*, in full assembly), know that I am not married – ruined as I am by your helps.”²⁵ Despite her assertion that the law will be her protector, she does not seek to prosecute Lovelace and the women. Anna Howe’s letters following the crime press her to prosecute the guilty parties. Even Anna’s mother insists Clarissa overcome her modesty and take her rape to the courts. They try to persuade her to do so in order to help other young women avoid Lovelace’s deceit. Mrs. Howe places full responsibility on Clarissa’s shoulders to remove the danger Lovelace poses to others: “She says, that the good of society requires, that such a beast of prey should be hunted out of it: And, if you do not prosecute him, she thinks you will be answerable for all the mischiefs he may do in the course of his future villainous life.”²⁶ Anna understands better the complexities of Clarissa’s position. While she seeks vengeance for the loss of her dear friend’s honor, making mention of the more female sympathetic rape law of the Isle of Man,²⁷ she also understands Clarissa’s hesitation to attempt prosecution.

The Howes' desire to see Clarissa prosecute Lovelace is reminiscent of a number of the court proceedings from the Old Bailey.²⁸ In several cases, other women – mistresses, mothers, fellow servants – act as the moral support necessary for the victims to prosecute. In the case of the rape of Sarah Sharpe, both her mother and her mistress allegedly pushed her to tell them the truth and then sought to bring the rapists to justice. Likewise Martha Linnett's mother is said to have actively pursued prosecution against the man she believed raped her daughter.²⁹ Rape was considered a crime against the father or male relations, according to Beth Swan, since it destroyed the woman's virtue and therefore marriageability.³⁰ But it seems women, according to these historical records, and as we can see in *Clarissa*, were central in the narratives when pursuing justice against rapists.

Clarissa, however, chooses to approach Lovelace's relatives with the story of the rape. This effectively maintains her public dignity while disgracing Lovelace. On a more practical level, Clarissa's decision not to prosecute might have been in her best interest when considering the likelihood of the courts finding Lovelace and the women guilty. According to the records of the Old Bailey, in only 15% of the rape cases involving a female accomplice were the defendants found guilty of the crime in a 137-year period. While Clarissa's class might have aided her case, were one like hers being tried in the Old Bailey, it seems likely that the charges would have been dismissed. However, cases involving women who acted in defiance of their parents or societal norms were nearly always returned not guilty.³¹ Clarissa's flight from her parents' home would severely have undermined her character in court. Likewise, the ability to

produce character witnesses would also have been an essential element in the case. We have already acknowledged Lovelace's ability to produce characters of any sort to do his bidding throughout the novel, so it is not difficult to imagine him easily producing "character witnesses" to praise him or even reduce Clarissa.

In cases where the male assailant was known, the female defendant rarely had to produce a character witness. In these cases, their defense hinged almost entirely on the man's defense.³² Clarissa might have found more difficulty producing character witnesses. Although it is Anna and Mrs. Howe who push her to seek justice through the court systems, we might question whether either would have attended the trial to give her character. Anna has not been able to rescue her from Lovelace. How could Clarissa expect her to appear in court on her behalf? Even in cases where victims produced favorable character witnesses, often these witnesses were negated by the defendants' character witnesses, effectively making it a matter of which side is more convincing. The records of the Old Bailey prove Clarissa is correct in being apprehensive about prosecuting Lovelace. She could not have been confident of seeing justice served. She could only be sure that an incredibly personal matter would become public knowledge. More to the point, however, Clarissa being under twenty-one would require a male relative to prosecute the rapists.³³ Since Clarissa views the rape as the physical outcome of her father's curse upon her, one can easily understand why she feels prosecution is not the best avenue.

Would a failed attempt at prosecution make Clarissa's story more tragic? Perhaps in the public humiliation she would face, but Clarissa's story is not entirely about tragedy. Although the novel's climax and resolution are certainly

tragic, it is still very much about a novel about a woman struggling to maintain control over her life and her virtue. While Clarissa suffers a horrendous crime, her ability to stand up to her rapists shows she is not merely a victim in the novel. Clarissa's actions following the rape move out of despair and insanity to very purposeful acts of retribution. By informing Lovelace's family of his crime and confronting the women with their own wickedness, Clarissa effectively forces the guilty parties to confront their culpability. Clarissa's lingering death, which she allows out of shame, is the most effective method of prosecution available to her.

Despite the effectiveness of Clarissa's action on Lovelace, it does little to punish the women involved in the crime. Instead Richardson relies on a more old-fashioned device to achieve that purpose: fear. It is impossible to argue that the women are affected by their own guilty conscience so much as to see that they attribute all of their misfortunes following Clarissa's death to their wickedness against her. As Sinclair is dying, she cries out:

What mercy can I expect! What hope is left for me! ---
Then, that sweet creature! That incomparable Miss
Harlowe! ---She, it seems, is dead and gone! ---O that
cursed Man! Had it not been for *him*! I had never had
This, the most crying of all my sins, to answer for! ³⁴

Mrs. Sinclair conveniently forgets her role in the crime against Clarissa and instead seeks to beatify her memory of Clarissa. Clarissa is the only moral person she has ever known and so Sinclair remembers her as though she can redeem herself by absolving any of her culpability in the crime. This is why she attempts to blame it on Lovelace. However, when that fails, she is forced to acknowledge

her participation in the crime, causing her to confront her partners as well.

Looking to Sally and Polly, she informs them:

O what an angel have I been the means of destroying!
---For tho' it was that wicked man's fault that ever she
was in my house, yet it was Mine, and Yours, and
Yours, and Yours, Devils as we all were [...] that he did
not do her justice! And That, *That* is my curse, and
will one day be yours!³⁵

If indeed these women have been the destroyers of hundreds of women before, as Clarissa believes them to be, why are they so affected by their actions against her? Clarissa acts as an angel to Sinclair and the women by forcing them to face their actions, even if it is only in worldly measures. Sinclair and her women do not understand conscience in a moral way, but they do understand the loss of secular happiness. Sinclair understands her agonizing death as punishment for her evil doing as Sally and Polly understand the loss of their house under suspicious circumstances as their own punishments. It is only after the loss of Sinclair's health and the decline of Sally and Polly from their comfortable lifestyles, that each woman is able to comprehend her culpability in the crime. It is never a matter of guilt for the women but rather a demand for understanding of their current plight. They seek an explanation for the decline in circumstances and hit upon their crime against Clarissa as the catalyst. While the reader is given Clarissa as moral exemplum, Sinclair and her women are given Clarissa, the avenger.

Near the end of the novel, Belford bemoans, “Little knows the public what villainies are committed in these abominable houses, upon innocent creatures drawn into their snares!”³⁶ He is, of course, speaking of Sinclair and her women and the evil deeds they have done to Clarissa. The line is ironic, though, because the very letter Belford is writing serves to inform the public of these snares. Richardson does not allow the destruction of Clarissa to be placed entirely on Clarissa’s shoulders, but instead draws attention to the danger that the wicked women pose against their own sex. Through Clarissa, Richardson exposes an underworld of deceit, corruption, and vice within his own society and acknowledges both sexes are complicit in its existence. However, through Clarissa and Belford, he also shows how morality and goodness can overcome, at least spiritually, the horrors of this reality.

Clarissa, the Old Bailey, and Rape Law in Eighteenth-Century London

Understanding the implications of Clarissa's rape to the novel are key in understanding the dynamics at work between social classes, genders, and selves. In order to better understand those implications it is useful to have some background in eighteenth-century rape law and trial records. In this section, I explore how rape as a crime and a concept operated in eighteenth-century London through the analysis of legal record with a particular focus on actual rape cases tried and recorded in the Old Bailey. In the previous section, I discussed the power of prosecution and why Richardson did not have Clarissa seek legal vindication for the crime committed against her. This section further explores the laws governing the trial of rape, in order better to analyze the participation of the women in the crime against Clarissa.

The word rape develops in a unique fashion, providing valuable insight into how English rape law developed in the eighteenth century. The first recorded use of the term that can be directly linked to modern vernacular occurred in the late fourteenth-century functioning as a verb meaning, "to take [a thing] by force."³⁷ By 1400, the term took on the additional definition of the "act of carrying off a person, *esp.* a woman, by force."³⁸ This usage of the term continued into the nineteenth century. By the end of the fifteenth-century, rape had evolved to include the modern use of the term: "violation, or ravishing, of a woman."³⁹ It is interesting to note that the modern usage appeared first as a

noun, a thing that happened, and did not appear as a verb, or an action, until nearly a hundred years later.⁴⁰ The first recorded use of rape as noun with this meaning, comes from William Caxton in *The Historye of Reynart the Foxe* published in 1481: “There rauysschyd he and forcyd my wyf..See my lorde thys fowle mater, this is murdre rape and Treson.”⁴¹ It takes no stretch of the imagination to see the relationship between this usage and the first usage of the term over two hundred years earlier. Rape, in this instance, was an event that happened to the husband. It was something that infringed on his property, namely his wife. Even nearly a hundred years later when the term becomes a verb, the first uses of it in this capacity refer to the raping of wives and daughters.⁴² The act of rape for a significant period of time was little more than a violation of a man’s property.

Why is the etymology of the term significant? Mostly because it presents rape in a markedly different context than what we, as modern readers, generally associate it with. Is it any surprise that despite this understanding of rape, Samuel Richardson, at all times concerned with women’s thoughts, feelings, and opinions, would approach it from a notably different standpoint as the violation of the woman both physically and psychologically?

The development of rape law reflects the same property issues that the etymology does. Sir William Blackstone’s *Commentaries on the Laws of England* provide substantial insight into the evolution of English rape law through the middle of the eighteenth century.⁴³ Blackstone describes the crime of rape as “the carnal knowledge of a woman forcibly and against her will.” By the 1760s when Blackstone wrote the term had evolved into a more strict definition,

but he acknowledges the development of the crime, noting that Jewish law, more specifically Deuteronomy, punished rape in two ways. The first involved the ravishment of a woman engaged or married to another man, which was punishable by death. The second was concerned with eligible women and dictated the rapist would pay a fine of fifty shekels to the victim's father and be married to the victim without the power of divorce. Blackstone points out this law understood the crime as rape whether or not the woman consented. If the woman eloped willingly with the man, charges of rape could still be brought against him.⁴⁴ The crime can easily be seen then to be one not against the woman but against the patriarch whether it is husband or father. It is important to note that English law in the eighteenth century precludes cases of willing elopement from being indicted as rape as we can see in the legal definition of the crime.

The punishment for rape underwent a series of changes in England in an effort to prevent the crime. William the Conqueror determined capital punishment too severe and made the penalty for rape castration and blinding. While this law was in effect women were required to report the offense immediately to a credible person and the authorities to prevent punishment for false accusations. A later statute allowed women forty days to report the crime, but at the time of Blackstone's commentaries there was no statute of limitation imposed on the crime. This was largely due to a clause that reduced the charge to a misdemeanor if not appealed within the first forty days and reduced the sentence to two years in prison. Blackstone claims this limitation was removed when its "lenity [was] most productive of the most terrible consequences."

Despite the removal of the forty-day period, he does cite that “the jury will rarely give credit to a stale complaint.”⁴⁵ As rape cases were largely a matter of credibility, as we will see later, delay in the report could weight heavily in the jury’s decision. By the time Richardson wrote *Clarissa*, rape had once again become a felony crime carrying the penalty of capital punishment

Although Blackstone’s commentary on rape never touches on accomplices or accessories, an earlier section illuminates how Mrs. Sinclair and the prostitutes would have been charged if the case were brought to trial. A person could be charged as a principal in an offence in two degrees. The first degree principal carried out the attack or crime and the second degree principal aided or abetted during the crime. Blackstone is careful to point out that the second-degree offender need not be “within sight or hearing of the fact,” but is aware of the crime taking place and actively participating in it.⁴⁶ According to this point of clarification, Lovelace and Sinclair would likely be principal offenders in the first degree and Sally and Polly considered principal offenders in the second.

There has been much discussion of Lovelace and Clarissa’s knowledge of rape law and prosecution. Indeed, as Swan points out, Lovelace plans out his defense should he be brought up on charges in a letter to Belford, and Clarissa threatens Sinclair and her women with prosecution as principal offenders in her rape.⁴⁷ However, what is more important to our investigation of the role of the women in the rape is Richardson’s knowledge and understanding not only of the law but rape cases as well. Lincoln Faller spends substantial time exploring the likelihood of Richardson’s familiarity with court proceedings.⁴⁸ Although as Faller points out, “there is no direct evidence that Richardson himself read trial

accounts [...] certain elements in *Clarissa* suggest he may have.” Particularly, according to Faller, Richardson’s description of Sinclair’s house as well as a remark made by Lovelace referencing a well-known rape case from 1730 demonstrate familiarity.⁴⁹

Whether or not Richardson was familiar with court records, the majority of eighteenth-century society was. The Old Bailey functioned as London’s main criminal court.⁵⁰ Beginning in the sixteenth-century, records of the proceedings at the Old Bailey were published as forms of entertainment. The first surviving copy of such a work is dated 1674 and titled *News from Newgate: or an exact and true accompt of the most remarkable tryals of several notorious malefactors... in the Old Baily*. The early editions of court proceedings contained only trials of interest to the general public, but in 1678 the first edition containing all of the court proceedings was published. It was soon decided that only accounts approved by the court could be published. The new format eventually was given the standard title *The Proceedings of the King's Commission of the Peace and Oyer and Terminer, and Gaol-Delivery of Newgate, held for the City of London and the County of Middlesex, at Justice-Hall, in the Old Bailey*, but it is now commonly referred to as the Old Bailey Session Papers or the Proceedings of the Old Bailey. These all-inclusive records of London’s main court originally reported eight times per year have since been digitized and made available for viewing and searching online.⁵¹ Faller notes that by the mid-eighteenth century, almost all had “evolved into near verbatim records of trial proceedings.”⁵² At times select records were offered as “*Dramatical Pieces*,” describing trial proceedings as a “*Story open[ing] with a new Scene of Action and a Variety of*

Incidents [...] continually arising to the Eye, and gradually moving on the final *Catastrophe*.”⁵³ Faller goes on to point out the similarities between a complex trial record and an epistolary novel such as *Clarissa*, noting the testimony-like feel of the novel’s narrative structure. Perhaps, as Faller suggests, Richardson was writing for an audience familiar with trial proceedings, counting on them to draw conclusions about the nature of virtue and sin in his novel.⁵⁴

If Richardson’s audience was familiar with contemporary rape cases, it behooves us to be as well. A search of the Old Bailey Proceedings Online produces records of twenty rape cases from 1675 to 1812 that involved both a female defendant and a female victim. Of these twenty cases, 85 % ended in acquittal for the defendants and 15 % in guilty verdicts. Three of these cases occurred before 1700. Of the three, only one returned a guilty verdict. After 1700, of the seventeen remaining cases involving both female defendants and victims, 88 % ended in acquittal.⁵⁵ Beginning in 1734, the majority of cases include the transcripts of the proceedings. Before that date, most of the cases and defenses were merely summarized. Biographical information on the defendants and victims is limited to information found within the text of the proceedings. The better-documented transcripts, which started in 1734, provide more information on many of the persons involved in the case, although abundant biographical information was not always given.

These records from the Old Bailey provide us with valuable insight into both how rape trials were conducted and how rape as a crime was perceived in the English court. At the same time, these proceedings, which were offered as

entertainment for the masses, would have had a substantial influence on how rape was perceived as a crime by English society.

The proceedings show a variety of outcomes and defenses, but the majority of the cases involve deception on the part of the female defendant. The first instance of female accomplice rape appears in the Old Bailey on July 7, 1675.⁵⁶ In this case, the unnamed woman was accused of abetting an unknown rapist at her house. The victim and her parents brought charges against them. The defendants were acquitted due to the testimony of character witnesses on their behalf and witnesses against the character of the victim and her mother. This case is markedly similar to the other instance of a not guilty verdict before 1700. In the second case, a Mary Champian was accused of luring the victim, Mary Haynsword, away from her home and then forcing her to stay the night with a Mr. John Pledwell.⁵⁷ In this case, the mistress of the house was called as a witness, but her testimony was dismissed due to impertinence and knowledge that she ran a Bawdy-house. Finally, a butcher came forward and accused Haynsword of commonness.⁵⁸ Based primarily on this character witness, the jury acquitted both parties. Character witnesses thus became one of the key elements of rape trials effectively turning the trial into a matter of which side provided more convincing testimony.

The only guilty verdict before 1700 was given on May 16, 1689 and resulted in both defendants receiving death sentences. Abigail Bargeer and John Bargeer were both found guilty of the rape of Elizabeth Deer.⁵⁹ Abigail lured Deer to an inn where the victim was forced to lie with her and a man all night long. The man raped Deer while Abigail held her. In the trial it was brought to

light that the man, John Bargeer, had promised marriage to the victim, not owning that Abigail was his lawful wife. The victim had wanted to marry him before she was taken to bed, but prosecuted him when she learned the truth. In her defense Abigail claimed she had no idea her husband had meant to hurt the girl. In this instance, both were found guilty and sentenced to death. Abigail attempted to plead her belly, but a Jury of Matrons determined her not to be with child and both were executed. What is most interesting about this case is that although it, like the cases before it, lacks physical evidence and relies entirely on testimony, both defendants were found guilty arguably because the victim was promised marriage. Unlike the previous two victims, Deer admits a degree of willingness on her part in the beginning albeit due to her belief that she and John Bargeer would be married.

After 1700, the cases become more complex most likely due to a shift in the detail with which court proceedings were recorded due to increasing public interest in trial records. The first case of female accomplice rape in the eighteenth century is remarkably similar to the novel's descriptions of Lovelace's original designs on Clarissa. On February 28, 1707, Catherine Masters, a girl of about ten years, was staying in an inn with Alice Gray, the defendant, as her bedmate.⁶⁰ During the night Gray allowed an unknown man to enter the room and force himself upon Masters. While the man was raping the girl, Gray held her and covered her mouth. Masters was after found to have the pox and Gray was found guilty of aiding the unknown man in the rape. She was sentenced to death in April of that year. In a similar case tried on the same day, an Elenor Rodway was accused of assisting an unknown male in assaulting a 10 year-old

virgin.⁶¹ However the case was dismissed due to lack of evidence, particularly due to the lack of information surrounding the unknown male assailant.

Although young girls brought both cases against women and unknown male assailants, only the first held up largely due to the presence of the pox in the first victim. Since the second victim suffered no physical ailments as a result of the rape, the case was dropped.

One case of particular interest when considering the role bawds may have played in the rape of young girls is that of Susannah Clark on June 7, 1739.⁶² Susannah Clark, known as Nanny in her house, was accused of being present when a Mr. Samuel Bird raped a young girl, Mary Edwards. Edwards claimed “Nanny” sent her to take a pot of beer upstairs where Bird then attacked the girl. According to Edwards Nanny left the room after a few minutes and went to tell another woman downstairs what had happened. A female witness was produced who claimed to have been there and witnessed Edwards making advances toward Bird. Based on this witness’s testimony, both Bird and Clark were found not guilty.

The difficulty in reviewing rape cases of this time period is the unbalanced proportion of guilty to not guilty verdicts. While 15% of rape cases involving a female defendant resulted in a guilty verdict, 20% of all rape cases during the same time period (1675-1812) ended in a guilty verdict. Of that number, a full 32 cases, or 43%, were cases where the victim was under the age of twelve.⁶³ Reading through accounts of the crime, it is difficult to dissociate one’s impulse to reach a conclusion regarding the case and to determine oneself whether the actual verdict was just. Some of the not guilty verdicts seem clearly incorrect,

while others seem on target. One such case involved that of Ann Glass tried on July 14, 1742 for an assault on Catherine Glass, her stepdaughter through a second marriage.⁶⁴ Catherine claimed she was forced to have sex with both Ann's son from her first marriage and a carpenter named Thomas. Catherine, who had just turned 12 years old the week before the trial, was thought to be with child and when threatened to be sent away by her Godmother brought charges against Ann. The girl's story is strange to say the least. At once she claimed to have had forced relations with her brother-in-law but was certain that the child she carried was that of the carpenter. The defendant produced a witness to confirm Ann's alibi and the jury acquitted her.⁶⁵

Most cases hinged on the character witnesses each side could produce, but cases where the victim imbibed alcohol nearly always presented a not guilty verdict from the jury. In one such case, a Lucy Harris was accused of intoxicating the victim and then locking her into a room with the accused rapist, John Bell.⁶⁶ Near the end of the trial, Bell was able to produce one character witness, and the defense found three women to testify to the poor character of the victim. The combination of testimony against the victim's character coupled with her acknowledgement of drinking contributed to the jury's skepticism regarding her claim. An Edward Norton claimed to have lain with victim himself and that he saw "a young man upon her with his breeches down and her cloathes up." Another witness, Frances Rickerts testified, "I have heard a great many people say, she is a very loose girl." In a similar case, two young servants accused another female servant of getting them drunk and then helping a man rape one of them.⁶⁷ Elizabeth Broadben accused Sarah Clifton, a fellow servant, of luring her

and another girl to an inn where they were given beer and gin. According to Broadben, Clifton along with John Baynham locked the two in a room where Baynham forced himself on her while Clifton held her legs open. Broadben testified, "I cried out while she was undressing me , she first put her hand, then a handkerchief before my mouth, and tied it round my head; she pulled me on the bed [...] he got upon me, and she was at the foot of the bed, and pulled my legs. I kept my legs as close as I could; she pulled my legs open and held them open." After Broadben's testimony, Rachel Hamnet recalled, "She [Clifton] was holding Broadben's legs with both her hands (and open'd them) when he got upon her. [...] Sarah Clifton put her hand to her mouth first, and after that she put her handkerchief, and tied it behind." The defense countered that Broadben had invited attention from Winch, but he had not slept with her. Mary Owen, a servant girl, testified that Broadben entered the room and "sat on his knee [...] and Winch kissed her." Although both girls gave the same account and a physical examination of Broadben suggested she had been raped, the case came down largely to the testimonies of each side and the defendants were acquitted. In both cases despite evidence and strong testimony on the part of the victims, juries ruled in favor of the defense.

In other instances, parental actions affected the trial verdicts. In the trial of Mary Cove for aiding Joseph Dowling in raping Sarah Sharpe, the interference of the victim's father-in-law may have substantially affected the outcome of the trial.⁶⁸ Sharpe went with Cove, an acquaintance of her mother, from her mistress's house to assist her for an evening. Sharpe claimed that Cove gave her alcohol and then held her arms as Dowling raped her. She then sat up all night in

the room, undressed, scared to go home. Over the next couple of days, she admitted what had happened to her mistress, who sent for her mother. Upon the arrival of her mother, the two women examined the young girl and found her thighs bruised and blood on her shift. According to Margaret Molineux, Sharpe's mother, her thigh was "scratched with nails [...] and black and red." Molineux also told the court that she examined Sharpe's linens and found them "in a filthy bloody condition, and greasy with grease that he put upon her." During the trial, however, evidence was produced that Sharpe's father-in-law had went to Dowling seeking a monetary settlement. This information coupled with witnesses from the inn who claimed they would have heard the crime due to thin walls and the testimony of the defendants that Sharpe was so intoxicated she became sick repeatedly weakened the prosecution's case. Dowling in his defense claimed Sharpe said "she would not stay to serve such a b-h of a mistress, for a beggarly shilling a week." Likewise when Ann Lock was charged with abetting Christopher Morris with the rape of Martha Linnett, the mother's action played a role in the outcome of the trial.⁶⁹ Lock was accused of taking the girl with her to camp and then luring her into a field where a young officer attempted to have his way with her. According to Linnett, he tried three times to have his way with her, each time hurting her in her private parts. Although she believed he succeeded the third time in his endeavor, she could not tell the court what he had hurt her with. The court pressed her several times on this point and it is unclear whether she was feigning naivete or genuinely innocent of sexual knowledge. When her mother was cross-examined by the prosecution, they were able to call into question her parenting skills. Susannah Linnett had come to London from

Oxfordshire and left her daughter in the care of her grandmother. Despite her age, Martha was allowed to come in to London to visit her mother and eventually ran away from her grandmother's to stay with her mother. The defense used this to present Martha as a wild girl who took to flights of fancy and the court returned a not guilty verdict.

The claimed assault of Martha Linnett is strongly reminiscent to that of Clarissa. According to court documents after Morris was indicted he sent a woman on several occasions to convince Martha to visit him at the prison, claiming he was on his deathbed. During these visits he promised to marry her to amend his wrongs against her and then sent her letters at home claiming the same thing. Based on this promise, Linnett did not appear in court and the first hearing and the charges were dismissed. Afterwards when she was discovered to be infected with venereal disease and that the woman who had enticed Martha to the prison was really his wife, Linnett's mother once again pressed charges resulting in the trial in question. Although the defendants were acquitted, the cunning on the part of Morris is reminiscent of the plotting of Lovelace. In Linnett's testimony, Lock is portrayed as a cold-hearted, cruel woman who rebukes Linnett for crying out against Morris during the assault. According to Linnett, "Ann Lock came back. She asked me what I was crying for, she said it was what I must come to, and she must come to, and all women must come to."⁷⁰ If Linnett's story was true, the measures Lock and Morris went to deceive her are on par with the actions of Lovelace, Sinclair, and the other women of the house toward Clarissa. Was Lock's judgment that all women must come to this end the same logic as Sinclair and the other women charged with similar crimes?

Only one of the cases, however, had a strong connection with prostitution. Lucy Roberts, a spinster, was charged, but acquitted, with aiding in the rape of Ann Cooley in 1758.⁷¹ Cooley, a servant to Roberts for about one week at the time of the crime, charged that Roberts dressed her up in a fine dress with ruffles and told her she would be waiting on some company of the ladies of the house. Cooley told the court she was ashamed in the presence of these ladies. That evening, Roberts asked her to carry a pot of beer upstairs, followed her, and locked her in the room with an another trial associated with an unknown man. After the man assaulted Cooley, he threw a half-guinea at her and left. According to Cooley, Roberts met her at the stairs and demanded Cooley show her what the man had given her. The next week Roberts told her to get dressed up again and turned her out of the house when she refused. After this, Cooley's parents were summoned and they reported the affair to the authorities. In the end, Roberts was acquitted when it was shown that Cooley had run away from home before she became a servant for Roberts. According to the court record, there is a record for Lucy Roberts for the same year on the charge of "procuring young girls."⁷² Unfortunately the proceedings of this charge are uncatalogued, but the implications are clear.

The majority of the cases recorded in the Old Bailey involve victims and defendants of lower classes, and Clarissa is as Polly points out, "a person of condition."⁷³ Despite this the records of rape cases provide a valuable precedent for not only the presence of female accomplices to rape, but a general attitude toward rape. Rape in the eighteenth-century is a complex and unctuous crime which is harder to prove than it is to commit. Given this context, is it any

wonder than that Richardson would have his character Clarissa forego prosecution? This seems likely not only out of fear of testifying against Lovelace, which would have been a necessity, but from concern over her credibility as a witness. For as Blackstone himself points out, the victim's fame strongly dictates the outcomes of the case.⁷⁴ While Clarissa is represented as a woman of outstanding moral character by Richardson, even the author knew certain actions taken by the lady would be viewed as morally questionable: the flight from her parents' house, travelling and living with Lovelace as "his wife," the company she was forced to keep before the incident. Clarissa, even without a legal knowledge, would have understood that it would be her word against Lovelace's, her character witnesses against his. Why should she endure the attacks on her character in a public court for a case that was at best dicey? Lovelace counts on her fear of public prosecution, but so do the women.

Prostitution in *Clarissa* and Eighteenth-Century London

As we saw in the previous chapter, prostitution may have been the catalyst for women aiding in rape against other women. Legally prostitution was not a crime and thus there is no way to cross-reference the cases in the previous section with prostitution records. However, if the charges brought against Lucy Roberts were any indication, tricking a young woman into a compromising situation may have been the first step in introducing her into a life of prostitution.⁷⁵ While we have discussed the role power played in the crime, it is important to consider the social and historical implications of the world's oldest profession on Richardson's novel. Throughout this section I will address how depictions of prostitutes in literature, both fictional and informative, may have influenced Richardson's portrayal of the women. At the same time, we will once again see how eighteenth-century society made female accomplice rape possible.

Prostitution in the eighteenth-century was not only a burgeoning profession but one in a state of evolution. To begin to understand the reason Richardson uses prostitutes as Lovelace's accomplices, we must first understand the London environment. In 1789, Johann Wilhelm von Archenholz would claim 50,000 prostitutes littered the streets of London.⁷⁶ An imprecise figure to be sure, but such statistics as to the number of prostitutes in the metropolis throughout the century are unavailable. The important thing is to see London through the eyes of a stranger. Also for the first time a line was being drawn between women who were merely sexually promiscuous and prostitutes.

Economics and sex in the eighteenth-century had become entangled as women marketed their own bodies as luxurious commodities.⁷⁷ The increasing number of prostitutes in London throughout the century coupled with an increase in bagnios and brothels made the city and its infamous ladies a topic of discussion for tourists and citizens alike. A variety of texts describing everything from the effects of the profession on the city to specific encounters, both intimate and in passing, are chronicled throughout the 1700s. It is not difficult then to see how Samuel Richardson, an upstanding man, might have been able to create such vivid depictions of the world of prostitution. As other scholars have noted, it is hard to imagine the reputable editor frequenting these establishments himself.⁷⁸

What is more important than how Richardson obtained this knowledge, though, is why he chose to include prostitutes in his novel at all. Pamela nearly suffers Clarissa's fate at the hands of Mr. B's servant, Mrs. Jewkes. Why replace the harsh servant woman with an aging bawd and her loyal prostitutes? It seems a matter of plot development. Pamela's tale concentrates on the dangers faced by young female servants while Clarissa's tale manipulates the hazards young women faced entering the city without the benefit of a male family member. Richardson's choice of heroine is confusing. If it was his purpose to show the horrors innocent young ladies faced away from familial protection, why not make Clarissa a young woman fresh from the countryside unaware of the predators lurking at every corner? Why not draw attention to the traps set for these young women? Quite simply because he had already accomplished that in *Pamela*. Clarissa's story is more profound because it not just her story, but the story of a inimitable rake as well as that of greedy, amoral harlots.

Defoe's *Roxana* includes a scene wherein the worldly Roxana strips down her maid and forces her to sleep with her husband. Roxana justifies the action, narrating, "I thought myself a Whore, I cannot say but that it was something design'd in my Thoughts, that my Maid should be a Whore too."⁷⁹ Roxana's story clearly shows how and why a woman might trade sex for survival in a patriarchal society. While Roxana is fortunate to enjoy the life of a kept mistress for much of the novel, she comprehends that she is actively whoring herself for it. Why does she feel the need to prostitute her maid though? Quite possibly because Amy, her maid, has impressed Roxana's husband with her "Fidelity and Kindness" and Roxana needs to maintain Amy at or under her perceived level.⁸⁰ It would not do to have a maidservant more virtuous than oneself. If Roxana is a whore, then her maid must be one as well. The role of prostitutes in literature thus becomes one of the predator seeking to augment her power through the extension of her sexuality to the women around her.

Clarissa, however, enters the world of prostitution unbeknownst to her. She is at the mercy of women who think like Roxana; they were whores, so Clarissa should be also. Clarissa is not so different from the young country woman tricked into prostitution by the aging bawd at the beginning of Hogarth's *A Harlots' Progress*. She is weary enough of Lovelace's intentions, but, like so many naïve young women, she is unaware of the danger Sinclair and the women pose to her virtue. Richardson removes his heroine from the relative safety of her father's home, excluding of course the danger of a forced marriage, and transports her into the heart of vice - a brothel run by women as calculating as Lovelace himself. Clarissa is thus introduced like that of erotic literature's

“female *religieuse*” in that she seems at times “portrayed as submissive, gullible, and a victim.” This common icon of female sexuality is seen as “non-threatening, [because] she wields no power.” In pornography, this character’s introduction to sex would lead to her fall into lasciviousness.⁸¹ What is markedly different about Clarissa is that she does not fall despite being part of a plot that has all the characteristics to make this an inevitability, not merely a possibility.

Seduction and trickery were among the most common recruiting practices into prostitution. The first plate of *A Harlot’s Progress* illustrates how country girls were preyed on by bawds, and, upon closer inspection, we can see the bawd’s counterpart, Charteris, who clearly instigated the transaction.⁸² Lovelace himself makes reference to the rape case brought against Charteris, showing that Richardson indeed knew about the case and most likely Hogarth’s *Progress*.⁸³ This method of recruitment appears in Cleland’s *Memoirs of a Woman of Pleasure* as well, with different results than we might expect. That novel, which appeared shortly after *Clarissa*, featured a heroine who naively puts herself in the care of a bawd only to be sexually awakened by her bedmate, a prostitute with Sapphic preferences. It is interesting, of course, to be presented within such a short period of time with two very different depictions of attempted seduction into prostitution. Although Richardson does not have Clarissa innocently dropped into the middle of the city and swept away by a bawd, Lovelace does carry her unknowingly to a brothel where she is completely at the mercy of her abductor and the women of the house.

Meanwhile Cleland’s Fanny is thrilled to be offered a place by Mrs. Brown, only to be dressed up and accosted by both Brown’s male clients and her

bedmate, Phoebe Ayers. Fanny is aware that she is being accosted when she is left in a room with a man she describes as a brute, but she does not understand the full implications of Phoebe's molestations, excusing them "as nothing but pure kindness" in "the London way."⁸⁴ Fanny will eventually embrace a life of prostitution, but what is more to our purpose is how she is inducted into that life. Cleland's heroine is the victim of molestation at the hands of Phoebe, instigated through the deceptive mind of Mrs. Brown. Unlike Clarissa, however, Fanny's virtue is no match for the hypnotic world of sex wherein she will serve in a brothel and as a kept mistress.

Roxana and *Fanny Hill* offer insight into how we might perceive the fall of Richardson's prostitutes. Sinclair's ladies act throughout the novel as demonic handmaidens and as forgotten victims. Richardson's prostitutes are interesting in that we are given snippets of information throughout the novel that can be combined to give a general history of the ladies. Lovelace in a letter to Belford notices "the jealousy, pride, and vanity of Sally Martin and Polly Horton." He reflects that they were "brought up to high for their fortunes, and to a taste of pleasure and the public diversions [and] had fallen an easy prey to his seducing arts."⁸⁵ He later expounds on the subject in another letter to Belford, "Sally was a woman well-educated - Polly also- Both have read - both have sense - of parentage not contemptible - once modest both - still they say had been modest, but for me."⁸⁶ Lovelace's brief descriptions are telling. Not only do we know they fell victim to Lovelace's charms and subsequently entered a life of prostitution, we learn that both were educated and from good families. Sally upon meeting Clarissa even breaks into Dryden: "Fairer to be seen/Than the fair lily on the

flow'ry green!"⁸⁷ To be certain they were most likely not of Clarissa's status, but the fact that they were educated and have read suggest they were from families of some means. Instead, according to Lovelace's assertions, they are merely middle-class women who desired more excitement and power than their average existence offered them and thus not only were easy prey but perfectly willing to accept the lifestyle his ruination offered them. Unlike Clarissa, they internalize the whore's rhetoric and take their places as members of Sinclair's sinful brood. Sally Martin and Polly Horton take such an active role in the betrayal and rape of Clarissa that one can easily see them as bawds-in-training, preparing to follow in Sinclair's hellish footsteps.

Both women's attitudes toward Clarissa reflect this fall from grace at the hands of Lovelace. They have so deeply assumed their role as commodity that they immediately upon seeing Clarissa objectify her. She is an object to be evaluated: "What a complexion! What eyes!" and then to be given to them as a present of sorts, "You owe us such a lady!"⁸⁸ Why Lovelace owes them such a lady is unclear. If Sally's and Polly's seductions are any type of indication, it may simply be a matter of precedent. An anecdote offered by Mr. Mowbray later suggests bringing a woman to such a house was the first step in making her a prostitute:

'Has he done by her as that Caitiffe *Miles* did to the farmer's daughter, whom he tricked up to town (a pretty girl also, just such another as Bob's Rosebud!) under a notion of waiting on a lady ---*Drill'd* her on, pretending the lady was abroad. Drank her light-hearted; then carried her to a Play; then it was too late, you know, to see the pretended lady: Then to a Bagnio: Ruined her, as they call it, and all the same day. Kept her on (an ugly dog too!) a fortnight or three

weeks; then left her to the mercy of the people of the Bagnio (never paying for any thing;) who stript her of all her cloaths, and because she would not take on, threw her into prison; where she died in want and in despair!"⁸⁹

While I discuss the significance anecdote in comparison to Clarissa's rape later on, I think it is important to quote here because it shows that Richardson was aware of such recruitment tactics. It was the libertine's victim who was held accountable for his actions and made to pay his debt with her body. Mowbray's point in recalling this incident is to show how considerate Lovelace has been on Clarissa, but we might ask if he was so considerate of Sally and Polly? Both women argue that they would still be modest were it not for Lovelace. If we can assume this to be true, then the logical conclusion is that Lovelace's seduction left them no other choice than a life of prostitution. So naturally Polly and Sally assume Clarissa will join their ranks when Lovelace is through with her.

Despite their proclamation of Lovelace's guilt for their current state, no mention is made of Mrs. Sinclair's involvement in either Polly's or Sally's seduction; however, it seems likely she was a party to it. Likewise Sinclair serves as a second degree principal in Clarissa's rape, an act designed to usher her into prostitution. Laura J. Rosenthal touches upon this in her book, *Infamous Commerce*, seeing the prostitutes as using "Lovelace as a sexual 'machine' [...] to torment Clarissa [and] recruit her into prostitution."⁹⁰ The role Sinclair plays as bawd in the novel is historically and socially significant. Indeed an account from over a century later shows the tradition of bawds in organizing the rape of unwilling girls. Newspaper editor W. T. Stead began investigating London prostitution and found that girls who screamed or fought "were held down by the

brothel-keeper.” Many though, according to Stead, never knew what was happening because “a pinch of snuff would keep them snug until the gentleman had his way.”⁹¹

Bawds began their careers in various ways. Elizabeth Wisebourne, the daughter of an Anglican clergyman, was seduced in her teens while studying in Italy. There she claimed to have studied the Italian sex industry, as well as having gained some medical knowledge, particularly in the treatment of venereal disease. Upon returning to London, she opened a brothel near Drury Lane. She recruited girls from prison, buying their freedom to force them into servitude. She also sought recruits from children put up for sale by their parents or sent out to beg. Wisebourne “specialised in restoring their virginity after selling their maidenheads to the highest bidder.” Undoubtedly she did so to put the “maiden” back up for bid.⁹² Elizabeth Dennison, mistress of both Sir Francis Dashwood and Philip Dormer Stanhope, fell into prostitution after she was seduced by a rakish aristocrat, John Spencer. She eventually opened a brothel around 1730 aimed at providing the very best prostitutes to a select clientele.⁹³ Richardson could have been aware of either of these women, particularly Wisebourne whose biography, *Life of the Late Celebrated Elizabeth Wisebourne*, was published in 1721. It is especially interesting to consider his probable knowledge of Wisebourne since her brothel exhibited “an open Bible on the hall table” and provided “her girls [...] with devotional materials.”⁹⁴ Likewise Lovelace brags, “Thou wouldst wonder if thou knewest one half of my *providences*. To give thee but one: I have already been so good as to send up a list of books to be procured for the Lady's closet, mostly at *second-hand*. And thou knowest, that the women

there are all well read.”⁹⁵ In a later letter, he clarifies, “I hinted to thee in a former, that I had provided for the lady's in-door amusement. Sally and Polly are readers. My beloved's light closet was their library. And several pieces of devotion have been put in, bought on purpose, at second-hand.”⁹⁶ Lovelace’s contrivance of legitimizing Sinclair’s house through devotional texts is strongly reminiscent of Wisebourne’s brothel.

As to creating Sinclair’s appearance and manner, Richardson had plenty of sources to draw from. The bawd, while not a central figure in the courts of England, was one in its literature. Lady Creswel of *The Whore’s Rhetorick* (1683) as well as descriptions of bawds in other seventeenth and eighteenth-century literature, such as *The London Bawd*, figure largely into Richardson’s portrayal of Sinclair. The unknown author vividly describes Creswel:

She had near as many furrows in her Face, as Hairs on her Head, her Eye-brows were thick and hoary, her eyes appeared the most fruitful parts about her, sending forth a center yellow matter [...]; her Breasts appeared like a pair of Bladders, without the least particle of Air within [...]; tho’ she came in good orderly dress, yet she happened that day to have put on a pair of Gloves [...] that never had been furnished with Fingers: and so her tallons were laid open to every eye.⁹⁷

The depiction of Lady Creswel establishes her as an aging bawd. Throughout the pamphlet, she represents the ancient practice of prostitution as she relates the history and rhetoric of prostitution to a young woman considering entering the profession. Creswel instructs the young woman, Dorothea on the skills of prostitution, but as Irvine and Gravlee point out, “the reader is able to see what innocent Dorothea cannot: the truth Lady Creswel tells is said best by her

appearance and example, not by her words.”⁹⁸ Creswel uses the very practices she is teaching to seduce the naïve Dorothea into a life of prostitution. This depiction conveys the psychological power and callousness bawds had toward young, innocent women.

As Erickson points out in *Mother Midnight: Birth, Sex, and Fate in Eighteenth-Century Fiction*, Richardson refrains from falling back on too stereotypical a portrayal, instead relying on subtlety to convey Sinclair’s true profession.⁹⁹ Richardson’s motivation for doing so is unclear. Does he hope to create an empathic relationship between the reader and Clarissa by allowing us to solve the mystery of Sinclair’s real identity? Or did he simply know his readers did not need the stereotypical descriptions to see Sinclair’s occupation? How should one navigate punishing the bawd without admitting the moral compromise of the situation? While Sinclair is not presented to us as a Lady Creswell in the beginning, she appears in all her true ugliness after the rape. Perhaps Richardson meant to imply her true nature is only revealed after the heinous act and after Clarissa remains virtuous and unsusceptible to their machinations:

Her misfortune has not at all sunk, but rather, as I thought, increased her flesh; rage and violence perhaps swelling her muscly features. Behold her then, spreading the whole tumbled bed with her huge quaggy carcass: Her mill-post arms held up; her broad hands clenched with violence; her big eyes, goggling and flaming-red as we may suppose those of a salamander; her matted griesly hair, made irreverend by her wickedness (her clouted headress being half off) spread about her fat ears and brawny neck; her livid lips parched, and working violently; her broad chin in convulsive motion; her wide mouth, by reason of the contraction of her forehead (which

seemed to be half-lost in its own frightful furrows) splitting her face, as it were, into two parts; and her huge tongue hideously rolling in it; heaving, puffing, as if for breath, her bellows-shaped and various-coloured breasts ascending by turns to her chin, and descending out of sight, with the violence of her gaspings.¹⁰⁰

This late portrait of Sinclair reveals her underlying nature but too late to save Clarissa.

To Lovelace, Sinclair serves as his true mother, aiding and encouraging him in his schemes against Clarissa, according to Erickson.¹⁰¹ Sinclair serves not only as the mother bawd to her “nieces,” but as the twisted maternal figure Lovelace draws support and inspiration from. Erickson notes that Lovelace serves to break in naïve young women in Sinclair’s household and that “Mrs. Sinclair’s *trade*... is to break the resisting spirit.”¹⁰² If Erickson is indeed correct than Sinclair’s role as bawd transforms into that of the mastermind, it ultimately makes her more culpable than Lovelace in the rape against Clarissa.

Lovelace and Sinclair engage in what might be considered a business partnership. Laura J. Rosenthal points out that “Richardson associates his rake with not just illicit sex, but with *commercial* sex” and “Lovelace shares with [...] Mrs. Sinclair a contractarian perspective.”¹⁰³ This contractualism allows both parties to justify their actions because of the participation and consent of the other. What is interesting is that Clarissa does not consent either to the rape or the idea of becoming a prostitute thus nullifying any contract Sinclair could hope to make with her. However, without a concrete idea of her actual circumstances,

Clarissa has little power to prevent the attack or quash the notion of her becoming a prostitute. Lovelace knows this and reminds Belford:

The pretty simpleton knows nothing of the world; nor that people who have money never want assistants in their views, be they what they will. How else could the princes of the earth be so implicitly served as they are, change they hands ever so often, and be their purposes ever so wicked?¹⁰⁴

Concluding Remarks

Richardson's novel presents us with some of the most complex and ambiguous characters in all of literature. While we become acquainted with these characters at length throughout the course of the novel, it would take a lifetime to comprehend their motivations and actions. Richardson understood this better than anyone and perhaps that is why he spent such a considerable amount of time editing and reworking his novel. What remain clear throughout the novel are the themes of power, gender, and identity and how each character stands in relation to them.

Considering these themes in terms of history allows us to consider Richardson's motivations for plotting Clarissa's rape in this manner. However, it does not fully explore the psychological implications at play in the novel. As a modern audience, part of the horror of the rape is the consideration of what would psychologically motivate a woman to participate in the crime of rape.

It is important to note not only the women's willingness but pleasure in the idea of attacking Clarissa. The enjoyment of Sally Martin leads back to the question of motive. If Sally endured a similar event, it may account for her desire to "ruin" another woman. However does this make her a paraphiliac, or a person suffering from a mental disorder characterized by a preference or obsession with unusual sexual practices?¹⁰⁵ According to the Diagnostic and Statistics Manual IV-TR, Sally and the other women could easily fall into one of the categories of paraphilia. According to the manual, sexual sadism involves receiving pleasure

from inflicting suffering or humiliation on another person. On the other hand, voyeurism is taking pleasure from watching sexual activity.¹⁰⁶ The important thing to remember when considering these diagnoses is the issue of consent. In order for it to be classified as a disorder, the person must engage in these activities without the consent of the other person involved. By modern standards, Horton, Martin, and Sinclair could be categorized as paraphiliacs, since they not only cooperate in the planning and execution of the attack on Clarissa but derive pleasure from it as well. Further research and consideration of the psychological motivations of the women might well provide even deeper insight into the novel and Richardson himself.

The disturbing conclusion I must make then is that Richardson's novel is a reflection of a reality of eighteenth-century life. Richardson's novel serves to make us aware not only of the rakes plotting against innocents within his society but the women as well. Richardson is not alone in his depiction of such corrupt female characters and further investigation into the phenomenon of female accomplice rape and seduction in eighteenth-century literature will grant us better insight into both these crimes and eighteenth-century society. While I can not definitely lay blame for this phenomenon on any one cause, it is easy to see it as a problem created by a culture with an evolving understanding of class and gender and how one affects the other.

¹ This thesis will use Chicago style citations.

² Samuel Richardson, *Clarissa, or The History of a Young Lady*, ed. Angus Ross (London: Penguin, 1986), 1011.

³ Ibid.

⁴ The court proceedings for this thesis will be taken from the electronic collection of the Old Bailey records. The Old Bailey Online Project has worked diligently to provide a searchable, online database of all surviving court records from the Old Bailey from 1674 to 1834. To learn more about the project or to search the records, please visit: <<http://www.oldbaileyonline.org/>>.

⁵ Terry Eagleton, *The Rape of Clarissa* (Oxford: Basil Blackwell, 1982), 88.

⁶ Madeleine Kahn, *Narrative Transvestism: Rhetoric and Gender in the Eighteenth-Century English Novel* (Ithaca: Cornell University Press, 1991). Kahn's thesis is ultimately that Richardson never embodies himself in any one character, but she certainly believes that each of his characters is heavily influenced by parts of Richardson's own opinions and sentiments.

⁷ Judith Wilt, "He Could Go No Further: A Modest Proposal about Lovelace and Clarissa," *PMLA* (1977): 19-32.

⁸ Richardson, *Clarissa*, 883.

⁹ Wilt, "He Could Go No Further," 21.

¹⁰ Ibid., 22.

¹¹ Robert A. Erikson, *Mother Midnight: Birth, Sex, and Fate in Eighteenth-Century Fiction* (New York: AMS Press, 1986).

¹² Victor J. Lams, *Anger, Guilt, and the Psychology of the Self in Clarissa* (New York: Peter Lang, 1999), 113.

¹³ Wilt, "He Could Go No Further," 24.

¹⁴ Kahn, *Narrative Transvestism*, 106.

¹⁵ Ibid., 107. Kahn's argument throughout the introduction to her chapter, "Richardson and *Clarissa*," continually suggests that Richardson saw himself as the vehicle for the writing of these letters but not as the true author of the characters. See pages 105-108 for more.

¹⁶ Richardson, Preface, 36.

¹⁷ Kahn, *Narrative Transvestism*, 106.

¹⁸ Richardson, *Clarissa*, 552.

¹⁹ Ibid., 553

²⁰ Author's italics. Ibid.

²¹ Ibid., 729

²² Ibid., 999

²³ Ibid., 1011

²⁴ Ibid., 1011

²⁵ Ibid., 949

²⁶ Ibid., 1016

²⁷ Ibid., 1017

²⁸ For an in-depth review of these cases, please skip to page 29.

²⁹ See Joseph Dowling, Mary, the wife of Joseph Cove, sexual offenses: rape, 10th April, 1771. The Proceedings of the Old Bailey. Ref: t17710410-34; Christopher Morris, Ann Lock, John Mills, sexual offences: rape, 18th October, 1780. The Proceedings of the Old Bailey. Ref: t17801018-40

³⁰ Beth Swan, *Fictions of Law: An Investigation of the Law in Eighteenth-Century English Fiction*, (Frankfurt am Main: Lang, 1997). p. 114-15

³¹ Refer to the following cases: Ann Lock (Ref: t17801018-40), Lucy Roberts (ref: t17580113-34). In both cases the victim ran away from home, which was used in the prosecution's case to undermine their character.

³² See cases: Samuel Bird, Susannah Clark, sexual offences: rape, 7th June, 1739. The Proceedings of the Old Bailey. Ref: t17390607-41; John Bell, Lucy Harris, Richard Gyles, sexual offences: rape, 4th December, 1751. The Proceedings of the Old Bailey. Ref: t17511204-36; John Baynham, Sarah Clifton, sexual offences: rape, 4th December, 1755. The Proceedings of the Old Bailey. Ref: t17551204-29.

³³ Swan, *Fictions of Law*, 115.

³⁴ Richardson, *Clarissa*, 1389

³⁵ Ibid.

³⁶ Ibid., 1051

³⁷ See "Rape." Def. Verb 2. *Oxford English Dictionary*. Oxford University Press, 2006. <http://proxy.mul.missouri.edu:2586/cgi/entry/50197351?query_type=word&queryword=rape&first=1&max_to_show=10&sort_type=alpha&result_place=10&search_id=fSgA-isruwn-8543&hilite=50197351> In all future notes, I will refer to this source as the *OED*.

³⁸ See "Rape." Noun 2, def. *OED*.

³⁹ See "Rape." Noun 2, def. 3a. *OED*.

⁴⁰ William Caxton records the noun usage of this definition for the first time in 1481, but the verb form does not appear until 1577. See "Rape." Noun 2, def. 3a and verb 2, def. 3. *OED*.

⁴¹ Quoted from the *OED*, "rape," noun 2, def. 3a.

⁴² For the specific quotations see "rape," verb 2, def. 3. *OED*.

⁴³ Blackstone published his work in four volumes from 1765-1769. The commentaries were based on a lecture series on English common law Blackstone gave at Oxford beginning in 1753. See Sir William Blackstone, *Commentaries on the Laws of England*, Vol. 1, edited by Wayne Morrison,

(London: Cavendish, 2001): cxi, xxxviii.

⁴⁴ Sir William, Blackstone, *Commentaries on the Laws of England*, Vol. 4, ed. Wayne Morrison (London: Cavendish, 2001), 164.

⁴⁵ The specific statute that extended the period of time to report rape was Westm. 1. c.13. There is no note of when the statute of limitation on the crime was repealed. See Blackstone, 165-66.

⁴⁶ Blackstone, *Commentaries*, 27.

⁴⁷ Swan, *Fictions of Law*, 112-114.

⁴⁸ Forthcoming article. Lincoln Faller, "Tales of a Poisoning Female Parricide and a Prostitute Treated 'in a Manner Too Shocking to Mention': Two Criminal Cases and 'the Clarissa Effect,'" *The Eighteenth-Century Novel*.

⁴⁹ Faller notes in more detail that the published list of books owned by Richardson does not mention any trial collections, but he argues that Richardson's reputation would seem to preclude the idea of him having actually visited a brothel. Faller, p. 224-225. The specific case mentioned by Lovelace is that of Colonel Francis Charteris indicted for the rape of Anne Bond, see <http://www.oldbaileyonline.org/html_units/1730s/t17300228-69.html>. For the remark in the text, see *Clarissa*, 1432.

⁵⁰ Faller, "Tales of a Poisoning Female Parricide," 221.

⁵¹ See "About the Proceedings," The Proceedings of the Old Bailey Online, <<http://www.oldbaileyonline.org/proceedings/publishinghistory.html>>.

⁵² Faller, "Tales of a Poisoning Female Parricide." 221

⁵³ Quoted in Faller, 224, from *Preface to Select Trials ... at the ... Old Bailey*, 4 vols., (London: J. Wilkie, 1764), 1.

⁵⁴ *Ibid.*, 224.

⁵⁵ To review these results, conduct an advanced search at <www.oldbaileyonline.org> using the criteria of sexual offences, female defendant, and female victim.

⁵⁶ See "One young Woman, sexual offences: rape, 7th, July, 1675. The Proceedings of the Old Bailey. Ref: t16750707-8. <<http://hri.shef.ac.uk/luceneweb/bailey/highlight.jsp?ref=t16750707-8>>

⁵⁷ See John Pledwell, Mary Champain, sexual offences: rape, 26th August, 1685. The Proceedings of the Old Bailey. Ref.: t16850826-26. <<http://hri.shef.ac.uk/luceneweb/bailey/highlight.jsp?ref=t16850826-26>>

⁵⁸ Commonness as used here can most directly be linked to the adjective definition of "common," Def. 6b. *OED*: common woman: a harlot.

⁵⁹ See John Bargeer, Abigail Bargeer, sexual offences: rape, 16th May, 1689. The Proceedings of the Old Bailey. Ref: t16890516-79 <<http://hri.shef.ac.uk/luceneweb/bailey/highlight.jsp?ref=t16890516-79>>

⁶⁰ See Alice Gray, sexual offences: rape, 23rd April, 1707. The Proceedings of the Old Bailey. Ref: t17070423-26. <<http://hri.shef.ac.uk/luceneweb/bailey/highlight.jsp?ref=t17070423-26>>

⁶¹ See Elenor Rodway, sexual offences: rape, 23rd April, 1707. The Proceedings of the Old Bailey. Ref: t17070423-34 < <http://hri.shef.ac.uk/luceneweb/bailey/highlight.jsp?ref=t17070423-34>>

⁶² See Samuel Bird, Susannah Clark, sexual offences: rape, 7th June, 1739. The Proceedings of the Old Bailey. Ref: t17390607-41. < <http://hri.shef.ac.uk/luceneweb/bailey/highlight.jsp?ref=t17390607-41>>

⁶³ From 1675-1812, 375 defendants were indicted on charges of rape. Of those brought to trial, seventy-four were found guilty of the crime. Please note that the database lists 76 defendants, but two cases are repeated in the records. For more information see The Proceedings of the Old Bailey Online

<http://hri.shef.ac.uk/db/bailey/avprocess.jsp?c_type=+AND+offtype%3D7&c_spec=+AND+offspec%3D73&ver_gen=+AND+verspec+LIKE+%27%25t1%25%27&ver_spec=&pun=&d_gen=&v_gen=&ka_elem=&ka_text=&ka_type=exa&kb_elem=&kb_text=&kb_type=exa&kc_elem=&kc_text=&kc_type=exa&a_month=00&a_year=1675&b_month=13&b_year=1812&i_age=&a_age=&count=10&start=0>

⁶⁴ See Ann, the Wife of James Glass, otherwise Ann Cox, sexual offences: rape, 14th July, 1742. The Proceedings of the Old Bailey. Ref t1720714-23. < <http://hri.shef.ac.uk/luceneweb/bailey/highlight.jsp?ref=t17420714-23>>

⁶⁵ Most of the proceedings refer to relations from second marriages as “in-laws” rather than half or step relations.

⁶⁶ See John Bell, Lucy Harris, Richard Gyles, sexual offences: rape, 4th December, 1751. The Proceedings of the Old Bailey. Ref: t17511204-36. < <http://hri.shef.ac.uk/luceneweb/bailey/highlight.jsp?ref=t17511204-36>>

⁶⁷ See John Baynham, Sarah Clifton, sexual offences: rape, 4th December, 1755. The Proceedings of the Old Bailey. Ref: t17551204-29. < <http://hri.shef.ac.uk/luceneweb/bailey/highlight.jsp?ref=t17551204-29>>

⁶⁸ See Joseph Dowling, Mary, the wife of Joseph Cove, sexual offences: rape, 10th April, 1771. The Proceedings of the Old Bailey. Ref: t17710410-34. < <http://hri.shef.ac.uk/luceneweb/bailey/highlight.jsp?ref=t17710410-34&Submit=Retrieve+Material>>

⁶⁹ See Christopher Morris, Ann Lock, John Mills, sexual offences: rape, 18th October, 1780. The Proceedings of the Old Bailey. Ref: t17801018-40. < <http://hri.shef.ac.uk/luceneweb/bailey/highlight.jsp?ref=t17801018-40&Submit=Retrieve+Material>>

⁷⁰ Linnett’s testimony is available in the original text of the trial, which can be found by accessing the link listed in note 14.

⁷¹ See Lucy Roberts, sexual offences: rape, 13th January, 1758. The Proceedings of the Old Bailey. Ref: t17580113-34 < <http://hri.shef.ac.uk/luceneweb/bailey/highlight.jsp?ref=t17580113-34&Submit=Retrieve+Material>>

⁷² See Lucy Roberts, procuring young girl, Jan 1758. This charge and trial remain uncatalogued, no record exists within the Old Bailey, so it is unclear whether the charge relates to the Cooley trial or another incident.

⁷³ Richardson, *Clarissa*, 932.

⁷⁴ Blackstone, p. 167.

⁷⁵ For a detailed account of the charges brought against Lucy Roberts refer back to pages 32-33 and note 72.

⁷⁶ Johann Wilhelm von Archenholz, *A picture of England: Containing a description of the laws, customs and manners of England. ... By M. D'Archenholz, ... Translated from the French.* Dublin, 1790. *Eighteenth Century Collections Online*.

⁷⁷ For more on this subject see Vivien Jones, "Luxury, Satire, and the Prostitute Narrative," in *Luxury in the Eighteenth-Century: Debates, Desires, and Delectable Goods*, eds. Maxine Berg and Elizabeth Eger (New York: Palgrave, 2003): 178-189.

⁷⁸ Marin Seymour-Smith, *Fallen Women: A Sceptical Enquiry into the Treatment of Prostitutes, Their Clients and Their Pimps, in Literature* (London: Nelson, 1969), 112; Faller, "Tales of a Poisoning Female Parricide," 224-225.

⁷⁹ See Daniel Defoe, *Roxana or The Fortunate Mistress* (Oxford: Oxford University Press), 47.

⁸⁰ *Ibid.*, 45.

⁸¹ Julie Peakman, *Mighty Lewd Books: The Development of Pornography in Eighteenth-Century England* (New York: Palgrave Macmillan, 2003), 189-90.

⁸² For more on this see Sophie Carter, *Purchasing Power: Representing Prostitution in Eighteenth-Century English Popular Print Culture* (Burlington: Ashgate, 2004), 28.

⁸³ Richardson, *Clarissa*, 1432.

⁸⁴ John Cleland, *Fanny Hill, or Memoirs of a Woman of Pleasure* (New York: Carroll & Graff, 1990), 43-56.

⁸⁵ Richardson, *Clarissa*, 534.

⁸⁶ *Ibid.*, 940.

⁸⁷ Quoted in Richardson, *Clarissa*, 522.

⁸⁸ *Ibid.*, 522.

⁸⁹ The strange quotation marks are the author's. *Ibid.*, 1382.

⁹⁰ See Laura J. Rosenthal, "Clarissa among the Whores," *Infamous Commerce: Prostitution in Eighteenth-Century British Literature and Culture* (Ithaca: Cornell UP, 2006), 129.

⁹¹ Fergus Linnane, "The Rise of Covent Garden," *Madams: Bawds and Brothel-Keepers of London* (Gloucestershire: Sutton, 2005), qtd. in Linnane, 183.

⁹² *Ibid.*, 32-33.

⁹³ *Ibid.*, 40.

⁹⁴ *Ibid.*, 32.

⁹⁵ Richardson, *Clarissa*, 473.

⁹⁶ Ibid., 523.

⁹⁷ *The Whore's Rhetorick*. A Facsimile Reproduction with an Introduction by James R. Irvine and G. Jack Gravlee. (Delmar: Scholars Facsimiles and Reprints, 1979), 10-12.

⁹⁸ "Introduction", *The Whore's Rhetorick*. xii

⁹⁹ Erikson, *Mother Midnight*, 143

¹⁰⁰ Richardson, *Clarissa*, 1388.

¹⁰¹ Erikson, *Mother Midnight*, 140.

¹⁰² Samuel Richardson, *Clarissa*, qtd in Erikson, *Mother Midnight*, 145.

¹⁰³ Rosenthal, *Infamous Commerce*, 139.

¹⁰⁴ Richardson, *Clarissa*, 923.

¹⁰⁵ "Paraphilia." Random House Unabridged Dictionary, 2006.

¹⁰⁶ See "Paraphilia." Under Sexual and Gender Identity Disorders in the Diagnostic and Statistics Manual IV-TR (2000). <<http://proxy.msl.missouri.edu:2141/Document/Document.aspx?DocId=267&FxD=37&Scroll=1&Index=0&SessionId=6B55FDPNHVROHKES>>

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