What role did the mendicant orders play in investigating and adjudicating cases of potential false or heretical teaching among their members? Did the intra-order trials of Peter of John Olivi by the Franciscans in 1283 or of Durand of St. Pourçain by the Dominicans in 1314 introduce a new and relatively brief competing jurisdiction in such matters alongside episcopal, papal, and university jurisdiction in cases of doctrinal teaching and academic heresy? And for mendicants whose opinions were disseminated in university classrooms, what role did university masters play in investigating and adjudicating these cases?

The first case in which a friar, teaching at a university, had his opinions investigated and condemned is that of Frater Stephanus, presumably the Dominican bachelor Etienne de Venizy, in January 1241. The text of the condemnation has come down to us in two dif-

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2 Chartularium Universitatis Parisiensis (henceforth cited as CUP), ed. E. Chatelain and H. Denifle, vol. I, Paris 1889, 170-72 (#128). Most of the discussion of this case has concerned the dating of the event, a debate initiated by V. Doucet, La date des condamnations Parisiennes dites de 1241. Faut-il corriger le cartulaire de l’université? in: Mélanges Auguste Pelzer, Recueil de travaux d’histoire et de philologie, Université Louvain, 3rd ser., fasc. 26, Louvain 1947, 183-93. Doucet noted that some manuscript copies of the document, some of them Franciscan in origin (Assisi 428, f. 1r; Leipzig, Univ. 416, f. 163v; Rouen A.263, f. 305r; Turin, Univ. E.V.25, f. 218v; Vatican lat. 692, f. 179v), read: "Anno domini MCCXLIII nonis ianuarii [i.e., 5 Jan. 1244] subscripti articuli in praesentia Universitatis Magistrorum theologiae Parisiensium, de mandato domini Guillelmi episcopi, fuerunt examinati et reprobati per Cancellarium Odonen
ferent forms, one in which the orthodox opinion is listed immediately after each offending statement (e.g., Paris, B.N. lat. 16533), and one in which the orthodox rebuttal comes after the list of condemned errors (e.g., Auxerre 243, Paris, B.N. lat. 15661, and B.N. lat. 15820). That the focus of attention was on the positions or statements of the offending scholar, not on the scholar himself, is suggested by the fact that only one manuscript of the twenty three identified so far in which these condemned articles are recorded bothers to mention the accused, and then only as "frater Stephanus".3

The supposition that "frater Stephanus" was (1) a Dominican, and (2) is to be identified as Stephanus de Varnesia (Etienne de Venizy) is based on conjecture, but seems probable. The regent masters in the theological faculty of Paris played a major part in condemning these articles, so we may assume, as did Emile Chatelain and Heinrich Denifle, who included the document in their edition of the Chartularium Universitatis Parisiensis, that "frater Stephanus" was a member of the university of Paris or at least fell under its jurisdiction.4 The articles are scholastic in nature, address subjects found in the first two books of the Sentences and may well have come from a bachelor's lectura. Furthermore, in 1241 only two religious orders had houses of study at Paris:


5 Paris, Bibl. Nat., lat. 16360, f. 3r. The full list of known manuscripts is: Assisi 428, f. 1r; Auxerre 243 (206), f. 78r; Erfurt, CA Q.151, f. 3r; Escorial T.I.15; Leipzig, Univ. 416, F. 163v; Munich, Clm 3798; Naples, VII.C.12; Oxford, Merton 267, f. 115v; Oxford, New College 109; Paris, Arsenal 532, f. 219r; Paris, B.N. lat. 15661, f. 99rb; Paris, B.N. lat. 15702, f. 186; Paris, B.N. lat. 15820, f. 193ra; Paris, B.N. lat. 16360, f. 3r; Paris, B.N. lat. 16533, f. 54r; Rouen 387 (A. 263), f. 305r/306v; Turin, Univ. E.V. 25, f. 218v; Valence, Capit.; Vat. Borgh 296; Vat. Borgh 361, f. 219v; Vat. lat. 692, f. 179v; Vat. lat. 4847, f. 66v; Vat. lat. 9821, f. 128.

4 Most cases in which masters in the theological faculty at Paris were asked to give their opinion on doctrinal matters stemmed from teaching at their university. From time to time, however, they were called on (usually by the king or bishop) to help judge cases outside the university community, e.g., the Talmud in 1248 (CUP 1, 209-11, #178), the Evangelium aeternum of Gerard of Borgo San Donnino in 1254 (CUP