The Influence of Buddhism on Bhutanese trial system

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I. Abstract

This paper is an attempt to explain the influence of Buddhism on the Bhutanese Criminal Trial System particularly with reference to Karma Lingpa’s *Bardo Thodrel*- the judgment of the Dead. The fourteen century text by Karma Lingpa is a fascinating legal and historical source, on which the most modern Criminal Procedure of Bhutan is based by the enactment of our historic Civil and Criminal Procedure Code in the year 2001. Therefore, the author attempts to highlight some of the profound legal process and principles that have been adopted and followed when rendering the judgment of the dead to the accused (defendant) in relevance to the modern Criminal trial. The author notes, in particular, the many aspects of Bhutanese criminal procedure which pre-date their Western equivalents.

II. Introduction

The influence of religion as one of the most important sources of our law cannot be ignored. As prevails in many legal systems of other countries, Buddhism has played a very important role especially in the context of the Bhutanese Criminal Trial System. Under the Bhutanese Criminal Trial System, one cannot deny the adoption of certain profound practices and the standard of criminal justice system influenced through Buddhism for various centuries. In general, if one were to ask whether Bhutanese legal system falls in any one of the Adversarial or Inquisitorial system, it can be argued that the system is based on the adversarial principle of procedure with some elements of the inquisitorial system. According to the Adversarial system, disputes have to be resolved by the courts after giving fair and equal opportunity to present the case by both the parties. The courts in the Adversarial system act like umpires and do not to take sides or show any

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1 This paper was presented in the “Seminar on Nalanda: Interface with Buddhism and Environment” November 24-25, 2003 in Thimphu, as a part of celebrating “Festival of India in Bhutan”. This chapter is incorporated in the author’s forthcoming book “The Parasol of Silken Knot”.

2 Karma Lingpa (1327-1387). Karma Lingpa was a great terton (treasure discoverer) and discovered the treasure texts, which make up the *Bardo Thodrel*. Volume Ma of the *Bardo Thodrol* contains a detailed vision of the judgement of the dead.

3 For over all judicial process see the chapter on “Review on Judicial reforms in Bhutan” This paper was also presented International Seminar on Bhutanese Studies, August 21, 2003; The Centre for Bhutan Studies.

4 The adversarial nature of the Bhutanese trial system has its origin in the *Bardo Thoedrol* in which the trial begins with the production of the accused before the King of Purgatory. Therefore, the principle of *habeas corpus* is an integral part of the trial system under the Bhutanese Legal system.

5 This question is frequently asked when one interacts with the western lawyers or with the people from outside.

6 The Law is equal, equal for all beings. Impartial is the Law…. The law has no preference, without preference is the Law exerts from *Dharmasangiti Sutra*. 
favour or disfavour to any party. Questions may be asked by the judge to determine the facts and evidence presented before it. However, under any standard criminal procedure, it commences with the arrest of the accused, detention and the production of the accused before a judge, investigation,\(^7\) charge being laid, providing evidence and the commencement of sentencing or acquittal of the accused depending on whether found guilty or innocent.\(^8\)

Under the Bhutanese law the accused or the defendant is presumed innocent until proven guilty.\(^9\) This is ensured through the criminal process\(^10\) of production of the accused before a judge on suspicion of having committed an offence. The accused has the right to bail or the courts remands the accused to judicial custody or police custody depending on the nature of offence.\(^11\) Remand orders may be made for carrying out additional criminal investigation and the filing of charge sheets to the court.\(^12\) The court conducts uninterrupted hearing\(^13\) and depending on the nature of the crime allows public trial represented by a Jabmi (legal Counsel) of one’s choice.\(^14\) The presumption of innocence of the accused also ensures through the process that the burdens of proof or the onus propendi beyond reasonable doubt lies on the prosecution.\(^15\) The accused in the trial is also granted fair opportunity to submit counter arguments to challenge the evidence of the prosecution.\(^16\) In each stages of trial, the accused is granted an opportunity to submit written deposition (statement) or testimony (oral submission) to substantiate their legal contentions. Based on facts, evidence and the law, the court hands down reasoned written judgment.

### III. Legal Principles enshrined in *Bardo Thodrel*: in passing the Judgment of the dead

The elaborate criminal trial process is depicted in Karma Lingpa’s fourteen century text introduced in the form of *Raksha Mangcham*\(^17\) which is performed almost in every corner of the country on the Second Day of their three days

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\(^7\) Upali – Declarations without investigation is unlawful. “If the samgha, upali, regarding a matter (&c., Down to :) declares the re-establishment of concord, without having inquired into that matter and without having got to the bottom of it, this declaration, upali, is unlawful.” Vinaya Text Vol.20., Part III., pp 322.

\(^8\) Under Buddhism, “ There are five things which make a grant of acquittal to those who are conscious of innocence to be according to law. The Bhikkhu must be innocent and without offence, other must have censured him, he must ask the Samgha for acquittal as being conscious of innocence, the Samgha must grant it, the Samgha must be duly held and duly constituted. These, O Bhikkhus, are the five things which make a grant of the acquittal of those who are conscious of innocence to be according to law.” See Vinaya Texts – Vol.20, Part III, pp 18.


\(^12\) See Section 186., Ibid.

\(^13\) See Section 75., Ibid.

\(^14\) See Section 33., Ibid.

\(^15\) See Section 96.2, Ibid.

\(^16\) See Section 90., Ibid.

\(^17\) The dance performed in the Second Day of the (Tschechu) festival in the presence of the Lord Purgatory or the Lord of the Dead.
festival. In this text backed by dramatized performance of mask dances, almost all principles of fair trial procedure is enshrined in accordance with the principles of natural justice, on which the author would like to focus in this paper. In brief, the legal principles such as the right of habeas corpus (the production of the accused before a judge in person), the right of being represented by a legal counsel, uninterrupted hearing, knowing the charges, prosecution for the crimes, defence through rebuttal, production and establishment of evidence and ratio decidendi (the reasoned decision) based on facts and evidence are some of the principles which are of credible essence under Bhutanese Criminal Laws and jurisprudence and has the source and origin in the Bardo Thoedrel.

IV. The right of Habeas Corpus (Duen na): the accused Nyalbum is produced before the Lord of Purgatory.

In passing the Judgment of the Dead, the trial begins with the report of the appearance of a dead person (the accused, by name of Nyalbum) before the King or Lord of Purgatory, Shenjey Choki Gelpo. Habeas Corpus (ad subiciendum) is a Latin term, which means, "you may have the body or produce the body". Habeas Corpus is a writ, which requires a person detained by the authorities be brought before a court of law so that the legality of the detention may be examined.\(^{18}\) The right of appearance in person before a judge guarantees that the person accused for the commission of an offence is not, a person of mistaken identity. The judge establishes that the person who has appeared before the court is of established identity and is alleged for the commission of an offence. Therefore, the Lord asks the accused as to where he has come from and invites submission\(^{19}\) to be made before the court. "Where have you come from?.... Did you carry out any virtuous deeds and abstain from sinful ones? Tell me what you may have to say now."\(^{20}\)

V. The Open Trial

The fair and public trial is demonstrated by the fact that the accused Nyalbum is heard in the presence of all the Shingye lakhen. The Shingye lakhen includes Ox, Boar, Garuda, Lion, Raven, Tiger, Leopard, Makara, Wolf, Goat, Horse, Dragon, Male Stag, Snake, Oxen, Monkey, Female Garuda, Bear, Dog, Female Stag, Male Stag,

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\(^{18}\) Sir William Blackstone, who wrote his famous Commentaries on the Laws of England in the 18\(^{th}\) Century, recorded the first use of habeas corpus in 1305. But other writs with the same effect were used in the 12\(^{th}\) Century, so it appears to have preceded Magna Carta in 1215. For details, see “A brief history of habeas corpus” http://news.bbc.co.uk/1/hi/magazine/4329839.stm. See also P.Halshall (1998), “Modern History Sourcebook: Habeas Corpus Act, 1679”, halsall@murray.fordham.edu

\(^{19}\) The King of Purgatory asks the accused to submit orally (bshad rgyu chi ’dra yod dalta la ’ur shod chig)

\(^{20}\) (khyod su yin gang nas ’ongû nga ’ dun na mig hisa mi phodpa chi yinû ...dkarpo dge ba ’-skalpa ma chapa tsam zhi gug dod amû nagpo sdi gpa la ’zem long byas samû (bshad rgyu chi ’dra yod dalta la ’ur shod chig)

Wild Dog, Sheep, Rat, Hoopoe, Owl and Abominable Snowman. The open or public trial as opposed to in camera (behind closed doors) trial is meant to check against judicial caprice and creates public confidence in fairness, objectivity and impartiality in the criminal process and of the administration of criminal justice. Under Our Criminal Procedure Code, open trial may not be allowed only on certain cases where the courts finds necessary to protect privacy or other reasonable restriction that may be of essence by the nature and circumstance of the case.

VI. The Right to Counsel: the presence of Due Nagpo (Prosecutor) and Lha Karpo (Defence lawyer)

The trial proceeding is presided over by the impartial Lord of Purgatory (Shenjey Choiki Gelpo). The accused is represented by his Defence Counsel Lha Karpo and the Prosecutor represented by Due Nagpo in the presence of the general public represented by many animals in the realm. Under criminal trial of Adversarial system the state is represented by the prosecutor to prosecute the accused and the defence counsel to defend the accused and to counter the facts and evidence of the prosecution. The right to a Jabmi and legal aid is one of the profound principles of legal rights enshrined under Bhutan’s Criminal Procedure Code. However, under Bhutanese law the choice for a Jabmi is a personal matter of the accused and no one can impose representation to be made if the accused has competently and intelligently exercises the right of waiver.

VII. The charges: commission of various sins (offences)

In the particular trial, the accused is alleged of the commission of various offences (sins), including the offence against person, property, cultural heritage, wild life & environment, public order and other offences like fraud and defamation.

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21 For translated version see the sources at the end of this paper in order of sitting arrangement of the Shenjey Lhakhen.
22 For the qualifications for a Judicial Officer, the four Agati, See Vinaya Text, Vol. 20, Part III, pp 6-34.
24 The right to counsel under English law was recognized for certain cases only in 1695 and in case of United State in 1683 wherein it was mention that “all persons in all courts may plead their own cause themselves or their counsel.” For detail see Dr. A.N. Chaturvedi, “Rights of Accused under Indian Constitution”, Deep & Deep Publication, pp.232-234.
25 In Webb v. Baird (1853) the Indiana Supreme Court recognised a right to attorney at public expense for an indigent person accused of crime. The sixth Amendment to the United States Constitution also states “In all criminal prosecutions, the accused shall enjoy the right….to have the assistance of Counsel for their defence.” Many cases that came to light concerning the right to counsel during 20th century in the United States were Powell v. Alabama, Betts v. Brady, Gideon v. Wainwright etc., See for details http://www.nlada.org/About/About_HistoryDefender
26 See Section 33 (b) of the Civil and Criminal Procedure Code, 2001.
27 For example, indiscriminate killing (mthong tshad bsd) battery (brdung) hardened criminal (sdigpa cheba khyod las med) and patricide (pha dang ma manchad chungste shig dang srogma yan gyi srogchadpa)
28 Theft, larceny (taking without being given) (ma byinpa lenpa)
29 Desecration of religious artefacts (gtsulag khangla mechen bsregs)
VIII. Submission to the Court to plead guilty or not guilty (arraignment): an uninterrupted hearing

The court of Purgatory grants the opportunity to plead innocence or guilt to the offence of various sins (offences) committed during the lifetime of the accused. The accused in his submission pleads guilty in affirmative defence. However, the accused argues and pleads that the crimes (sins) were committed in the mitigating circumstances, of extenuating necessity and due to extreme poverty. The accused submits that the crimes were committed out of necessity to support his large family and had no intention to kill. The accused argues that although he was made aware that the commission of sins was bad, he was never aware of the consequences of such actions and the existence of punishment after death. "In my opinion, hell never existed. Thinking that no one has ever returned after seeing hell, I asked the people, "If there is hell, where is it? ....... to me it seemed that below our feet was all earth and stones and above us was empty sky....I never believed in the existence of hell and committed many sins." Further the accused submits that, had he known the actual existence of the consequences of such crimes that he had to face, he would have never committed the crime and submits his regrets and seeks the Lord’s mercy.

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30 Mass destruction of nature (*nagsri chenpo meyis bsregs*) and water pollution (*rgya mtsho che la dugchen btab*)
31 Discord (*khyim-mtshes ‘khrugspa sprad*) lacks virtue (*dge ba’ skal ba chad*) and wrong views (*log par lta ba*)
32 Lies (*rzun smra ba*) and cheating through weight & measures (*bre log srang log btsugs pa yi*)
33 Harsh and abusive speech (*tsig rtsrub rgyun du smras*) and blasphemy (*bshes gnyen yong la skurpa btab*)
34 See *Hamilton v. Alabama* (1961) [http://www.nlada.org/About/About_HistoryDefender](http://www.nlada.org/About/About_HistoryDefender)
35 Submission (*bshad rgyu chi ’dra yod dam*)
36 Defence of innocence and pleading guilty.(*dkarpo dge ba’-skalba ma chapa tsam zhig yod damu nagpo sdigpa la ’zem long byas sam*)
37 The accused submits that being poor he had to commit the crime (*long spyod ni chungû zas gos ni nganû bu smad ni mang bas bz’ rgyu medpasû ’sem chan mang po’ srogla ’bagspa lags*)
38 The principle of Criminal law is that, the poor (even if starving) are not allowed to take law into ones own hand. The law does not recognize the necessity to eat. For detail reading see G. Williams, “Text Book on Criminal Laws”, 2nd edn., Universal Law Publishing Co.Pvt.Ltd., on “Necessity and Starvation,” pp 608.
39 Under criminal law the absence of guilty mind “*mens rea*” is also taken into consideration while considering the charges against the accused in the trial.
40 He was not convinced that bad deed would lead to hell (*dmyal ba yod zer ba ae bden mi shesû dmyal ba phyin zer nas log pa ni min ’dag snyam*)
41 The crime would not have been committed if aware of such consequences (*ma go ma rig dbang gis sdigpa byaspa lags*)
43 He submits that had he known the existence of hell and bad actions would lead to hell, he would have never taken the lives (*di ’dra mngon sum yodpa cha yod na sdigpa mi byaspa lags te*)
44 That given a chance, he would strive for virtuous actions instead of non virtuous actions (*de nas sdigpa mi byas pa lagsû dgeba byas lags*)
In this uninterrupted hearing and submission by the accused, profound legal principles of defence such as the defence of mitigating circumstances, poverty as an excuse for the crimes, factual ignorance, lack of intention to cause harm, remorsefulness, pardon for promise of good conduct and mercy pleading for reformation were enshrined of which most of the modern Bhutanese criminology and penology is based and founded upon.

IX. The prosecution by the Due Nagpo: the Prosecutor

The prosecution (Due Nagpo) submits that even if the Lord was powerful (referring for the existence of the discretionary power of the Lord), one cannot be in a position to cleanse and overlook the crimes committed.

The prosecution re-iterates that the accused Nyalbum alias Doelpa Nagpo, Nagpo Kuen Sey or Shenpa Lagmar has committed the offence of indiscriminate killings of wild animals and destruction of marine life. The prosecutor further alleges the commission of assault against innocent persons and parents, use of harsh and contemptuous speech, commission of arson by setting forest fires and pollution of ocean, and the commission of the offence of theft and desecration of religious artefacts and monuments. The prosecution demonstrates that the accused has shown no remorse for the crimes and took delight out of such acts and reminds the Lord that the eloquence of speech cannot mitigate the crime.

The identity of the accused also get establishes with

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45 The submission made by the accused Nyalbum is voluntary without interruption which is evidenced by the fact that no questions whatsoever is asked when the submission as to plead guilty or not is made in the commencement of the trial.

46 Pleading ignorance and lack of awareness (dmyal ba yodzerba Ae bden mishesû mago marig dbang gis--)

47 Lack of intention to cause harm (khyod rnamsla brnyespa byasna sdiapa byaspa ma yin no)

48 The accused pleads for pardon, mercy and promise for good conduct. (sdiapa mi byas...dgebra byas las)

49 Mercy Pleading through compassion and protection (thrimsla migtugs par zhuû bdag la snying rje mzdû bdag gi grogs rten mzd)

50 The counsel argues the elimination of discretion (chos kyi rgyal po sku che yangû khyod kyi sdi pa bkag tu med)

51 A serial killer or red blooded killer.

52 (sens chan mthong tshad bsadû phu yi ri dags nyes med bsadû md’yi nya mo nyes med bsad)

53 Commission of assault on innocent persons and parents. (bar gyi sprangpo nyes med brdungû pha ma brdung shing---) Assault on parents and the penal offences contained in Ten non-virtues are the three physical deeds: killing, taking what is not given, and engaging in sexual misconduct, telling lies, divisive talk, harsh words and ill will or wrong views. (in the prosecution of the virtuous man -Chooki Gyalpo to Khimda Pelki)

54 Contempt on the respected and lawful authorities (bshes gnyen yong la skurpa btab)

55 Setting of forest fire, causing pollution and the poisoning of ocean (rgya mtsho chela dug chen btabû nags ri chenpo me yis bsregs)

56 Theft of the religious monuments and artifacts. (...sku gdung bchom)

57 Remorselessness and delight of crime (gsodpa’ dus su dg’ dg’ ‘dra û za b’ dus su zhim zhim ‘dra)

58 Eloquence of speech cannot mitigate the crime and overrule the facts (kha khas lche bdes chi la phan)
the corroboration through public knowledge and elimination of mistaken identity by spelling out the criminal records.\textsuperscript{59}

Therefore, the prosecutor submits that the accused is guilty of crimes against persons, property, wild life and environment, public order, fraud and defamation and demands no mercy or compassion to be shown for the punishment of such evil and wrong doings.\textsuperscript{60} The prosecution accuses the defendant of the commission of the alleged crime wilfully (the existence of guilty mind or \textit{Mens rea}), knowingly or intentionally and with motive of ulterior objective and achieving personal gratification.\textsuperscript{61} The prosecution seeks the Lord’s justice for punishment by sending to hell for no one can undo the wrong and submits that by showing compassion would over rule the popular views of the public.\textsuperscript{62}

\textbf{X. The Defence by the \textit{Lha Karpo}: the Defence Counsel}

The right to defence counsel is one of the basic elements of modern criminal trial procedure. The existence of the defence counsel (\textit{Lha Karpo}) to defend the accused \textit{Nyalbum} guarantees and demonstrates the right to fair trial proceeding recognized in the court of the Lord of Purgatory.

The \textit{Lha Karpo} submits that the accused captivated by ignorance,\textsuperscript{63} not knowing what is good and bad\textsuperscript{64} had committed the crimes (sins) in dullness of mind (being in the state of insanity) and not after having the knowledge of consequences. He pleads that the punishment may be mitigated due to the

:\textsuperscript{59} The accused is identified by the submission of the identity of family and reference of different names acknowledge by the public. \textit{(rga gar shar phyogs pa rnans kyisû bshanpa lag dmar zer ba yinû rga gar lho phyogs pa rnans kyisû sdig chan dmyal ba 'bum zhes zerû rga gar nub phyogs pa rnans kyisû rigs ngan gdol pa nag po zerû rga gar byang phyogs pa rnans kyisû nag po kun gsod zer ba yin)}

:\textsuperscript{60} If the accused is unpunished and go Scott free, the popular views of the society will not prevail \textit{(sem chan sa ya pham sbrags ste)}

:\textsuperscript{61} Under Buddhism, the act of killing is completed when committed by means of four aspects, such as “the preceding thought of intending "I will do such a misdeed!”; the deliberate engagement in the act and pursuing it with effort; the actual deed of killing, experiencing the act; and the conclusion of rejoicing in the act without feeling regret.” \textit{(sdig pa' yan lag bzhûg gzi bsampa sbyor ba mthar thug)} See “Dakini Teachings: Padmasambhava’s oral instructions to Lady Tshogyel” Translated by Erik Pema Kuenzang, Shambala Publications,Inc. Printed in the U.S.A., (1990).

:\textsuperscript{62} For the conviction of criminal offence the prosecution should establish the facts and evidence beyond reasonable doubt and must demonstrates the presence of all elements of criminal liability such as the accused had the \textit{mens rea}, intention, motive and the actual commission of the crime. In the final argument made by the prosecutor it is alleged that letting the accused go unpunished and free would mean unsafe society for the criminal offences are considered the crime against the state and the society.

:\textsuperscript{63} Pleading ignorance of facts and lack of mental capacity to differentiate right from wrong. \textit{(dge sdig mi shes gti mug rmong pa yiû ma rig dbng gis sdig pa byedpa yin)}

:\textsuperscript{64} Lack of mental capacity under modern criminal law is also considered as one of the valid defence, which is invoked, in the present circumstances of the case.
existence of some good deeds and due to the mitigating circumstances of necessity and submits to the Lord for liberation through compassion.

XI. The submission of evidence: the expert opinion and exhibits

The presentation of facts and evidence before the court also guarantees the right of the accused not to be condemned unheard or without proof beyond reasonable doubts. In this trial the delivery of justice is also enhanced by the presence of witnesses and especially the presence of Monkey (Tre), who submits his expert opinion to the Lord by weighing the arguments against the accused. To establish the conclusiveness of evidence and to substantiate corroborative evidence, the instruments used for the commission of offence are also displayed through exhibits in the court of the Lord.

XII. Judgment: the reasoned decision

The judgment is the final determination of the case supported by reasons based on facts, evidence and relevant provisions of law. In the case of criminal offences the pronouncement of judgment results in conviction or acquittal of the accused.

The King of Purgatory after having heard the submission of the accused Nyalbum in person, the trial having been conducted in open and in the presence of the public represented by his Defence Counsel Lha Karpo, and also after having fully considered the submission of the Prosecutor Due Nagpo, renders reasoned judgment (ratio decidendi) based on facts and evidence of the case. In pronouncing the accused guilty to the crimes after conducting exhaustive trial, the Lord of Purgatory holds that no one can nullify the results of one’s own action of the commission of offence. One has to suffer for the wrongs committed by one’s own action. Even thousand Buddhas many not be able to liberate and protect the crimes of which one has to reap the fruits. No one can escape from the breach of laws. There is nothing that the Lord can do even if remorse is shown after the commission of offence; the impartial judgment has to be based

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65 Mitigate punishment due to some good work (dge ba’ las kyang chung zad byas pa yod)
66 Submits that punishment for ignorance is not warranted (’dila chad pa chad du mi ’tshal lo)
67 Establishes conclusive evidence through the production of articles used for the commission of crimes. (mtshon cha logs la btags rung yodû--- da lta nyid du lhas pas gsal ba yin)
68 Exhibits, identifying the use of article (bre srang rgyab tu khur rung yod)
69 There are generally four kinds of legal questions that require formal settlement. In the words of Lord Buddha “There are, O Bhikkhus, the following four kinds of legal questions that require formal settlement by the Samgha; (that is to say), legal questions arising out of disputes, legal questions arising out of censure, legal questions arising out of offences, legal questions arising out of business.” Vinaya Text, Vol.20, Part III, pp 35.
70 Punishment is the results of ones own deed or crimes. (rang gis las byas rang la smin tsa naû sang rgyas stong gis mthus kyang skyob sa med)
71 No excuses for the breach of law (las kyi gshin rje’ thrims rar tshud tsa naû kha drag dsan kyang ’di ru bya thabs med)
upon wrong against the right.\textsuperscript{72} However, by acknowledging the merits of virtue over evil and by serving the sentence (imprisonment in the hell), the Lord is reformative in his judgment and states that the sinner (prisoner) be liberated and accomplish Buddha hood and be born in the realm of Buddhas.\textsuperscript{73}

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\textsuperscript{72} Impartial judgment of wrong against right (\textit{gyo srang gzulta legs nyes brtags spyad pas})

\textsuperscript{73} Vindication through reformative sentencing (\textit{khyod kyi sdig sgrîb myurdu dag nas kyangû mthar thug sang rgyas go 'phang thob par shog})
Primary Sources
*Bardo Thosgrol* by Karma Lingpa (Fourteenth Centaury –1327 to 1387) -Garun Puran.(Zabchos zhikhro dgongpa rang-grol sridpa bardo dge sdig rang-gzugs stonpa’ gdamspa sridpa bardo rang grol zesbya wa)

*Raksh Mang Chham* (dance performed in the festivals)- Right Side lead by Ox (Raksha), Boar (Phag), Male Garuda (*Chhung- Fo*), Lion (*Singhi*), Raven (*Ja-rog*), Tiger (*Tag*), Oxen (*Lang*), Leopard (*Zig*), Makara (*Chhu Sin*), Wolf (*Chang*), Goat (*Ra*), Horse (*Ta*), and Dragon (*Druk*).

Secondary Sources
Jangchhub Singi alias Tsuendru's *Namther*; Ashi Nangsa Woebum's *rNamthar*; Sangay Chhozom's *rNamthar*; Karma Wangzin's *rNamthar* Lingsa Chhoki’s *rNamthar* (KMT press, reprint 2003) and *Chham Yig* by Dasho Nakphel (1970s).