

## **EVIDENCE BY THEME**

### **Hyperbole and exaggeration to attract attention and funding**

Our evidence implies that the size and structure of the illicit market is at odds with the conventional wisdom espoused by some journalists and researchers. Commonly quoted estimates of the size of the illicit market range from hundreds of millions to billions of dollars, while news stories frame antiquities trafficking as the domain of well-organized criminal networks. In contrast to these assertions, our research points to a market that looks smaller and is less organized. **Findings, page xi to xii**

Fuelling this disconnect between reported looting and assumed markets for these goods is the problem that bloggers, journalists, and advocacy groups, although often producing high-quality research, are rewarded for sensational headlines and claims that bring attention to their issues and readers to their pages or sites. In the context of antiquities trafficking, this disconnect between the scale of looting and its estimated market value has led to seemingly exaggerated claims about the size of the market for these goods and has muted more-moderate voices in the debate arguing that, despite the appalling destruction that looters are causing to cultural heritage, the economic value of these goods is relatively small.

### **Introduction, page 3**

Despite pressure from the International Criminal Police Organization's (INTERPOL's) Expert Group on Stolen Property for better data gathering and systematic research, "it remains impossible, to this day, to precisely rank illicit traffic in cultural objects so as to measure it to other types of transnational crimes."

### **Issues with the Current Approach for Assessing the Antiquities Market's Relationship to Terrorist Funding, page 8-9**

In the absence of grounded data, journalists, researchers, and policy experts regularly inflate the importance of antiquities trafficking in funding for international terrorism and organized crime.

### **Issues with the Current Approach for Assessing the Antiquities Market's Relationship to Terrorist Funding, page 10**

Linking cultural property crimes to these high-profile law enforcement issues offers a means to bring funding and political attention to what has traditionally been an underrecognized issue. However, the facts and figures used to support these arguments are often misinterpreted or overstated. Unsubstantiated claims about the relationship among looting, weapons, drugs, and money laundering are common in both expert and popular publications, and inaccurate or exaggerated estimates of stolen items' value abound. The absence of a comprehensive effort to quantify the trade has also encouraged the spread of misleading or inaccurate statistics.

### **Issues with the Current Approach for Assessing the Antiquities Market's Relationship to Terrorist Funding, page 10**

Highlights Martin Chulov \$36 million claim and associated problems  
**Issues with the Current Approach for Assessing the Antiquities  
Market's Relationship to Terrorist Funding, page 10-11**

Highlights Interpol drugs, weapons and cultural property claim and associated problems  
**Issues with the Current Approach for Assessing the Antiquities  
Market's Relationship to Terrorist Funding, page 11**

An article in the Wall Street Journal included estimates from **Michael Danti**, an archaeologist and academic director of ASOR CHI, placing the value of the Islamic State's antiquities trafficking in the "low tens of millions" annually, while a French security official placed the figure at \$100 million. **Lehr**, of the **Antiquities Coalition**, estimated that "[c]oming out of Syria, it is \$2 billion" and "[w]ith Egypt, it is probably \$3–10 billion, globally it has to be a much more significant number."

**Issues with the Current Approach for Assessing the Antiquities  
Market's Relationship to Terrorist Funding, page 11**

This reality that antiquities auctions represent a small market that is not always able to find buyers in well-advertised sales is at odds with the media's assumption that there is a booming unmet demand for these goods that is capable of supporting a billion-dollar black market.

**Issues with the Current Approach for Assessing the Antiquities  
Market's Relationship to Terrorist Funding, page 12**

Despite the growing public outcry about the scale of looting in the conflict zones of the Middle East and the growing policy interest in the use of antiquities looting as a source of terrorism finance, there is little concrete information available about the size of this illicit trade. Moreover, there are not even comprehensive statistics that describe the legal portion of the global antiquities trade. However, this lack of data has not diminished the spread of wildly varying estimates about the size of the market for looted antiquities.

**Measuring the international trade in antiquities, page 69**

Simply put, while we cannot claim to measure the size of the illicit market, we can show that observable market channels are too small to act as conduits for a billion-dollar-a-year illicit trade.

**Measuring the international trade in antiquities, page 70**

Together, our data do not support the assessment that the market for antiquities in Europe and the Americas is sufficient to support the sale of billions of dollars a year in looted antiquities that some estimates claim. While analyses of looting and the supply side of the antiquities market have documented extensive looting in the Middle East and North Africa (see Chapter Two), our analysis of the major sales channels in Europe and the Americas has not identified evidence that a sufficiently robust international market exists to market and sell these goods.

**Summary, page 84**

“Our aggregate data suggest that the market for all antiquities, both licit and illicit, is on the order of, at most, a few hundred million dollars annually rather than the billions of dollars claimed in some other estimates ... We believe that, going forward, scholars arguing that the illicit market is larger than we suggest here will need to more clearly articulate the means through which these goods are sold.”

**Summary, page 84-85**

### **Illicit market size and nature**

Our evidence implies that the size and structure of the illicit market is at odds with the conventional wisdom espoused by some journalists and researchers. Commonly quoted estimates of the size of the illicit market range from hundreds of millions to billions of dollars, while news stories frame antiquities trafficking as the domain of well-organized criminal networks. In contrast to these assertions, our research points to a market that looks smaller and is less organized. **Findings, page xi to xii**

The market size is smaller than often reported. Our data indicate that the illicit market is likely much smaller than the multi-billion-dollar claims that are commonly quoted. We find no evidence that illegal sales are occurring in large or even steady quantities on deep web platforms, such as Facebook or Telegram, and we find virtually no evidence of antiquities being traded on the dark web. As for the “visible” market of auction houses, dealers, eBay, and other online outlets, we find that the entire market (looted or not) is not likely to be larger than a few hundred million dollars each year. Even this is likely an overestimate, given that our appraisals contain data with fakes, replicas, and other non-antiquities.

**Findings, page xii**

Market structure varies widely, but it often appears ad hoc and opportunistic. Organized crime actively participates in the illicit antiquities market in some regions, including Bulgaria, Greece, and Italy, but we found a second type of network that involves some activity in Iraq and Turkey. This network is best characterized as an organic, ad hoc system of smugglers, middlemen, and brokers whose trade in antiquities is opportunistic and sometimes sporadic.

**Findings, page xii**

Highlights Martin Chulov \$36 million claim and associated problems

**Issues with the Current Approach for Assessing the Antiquities**

**Market’s Relationship to Terrorist Funding, page 10-11**

Highlights Interpol drugs, weapons and cultural property claim and associated problems

**Issues with the Current Approach for Assessing the Antiquities**

**Market’s Relationship to Terrorist Funding, page 11**

Although this undoubtedly happens, the reports offered in our interviews challenge this model, instead suggesting that items are sold for their “international market price” very early in the supply chain. If collectors in Turkey and Iran are buying these items for prices similar to what they would attract in the United States, then there is less opportunity for

importers and dealers to make money through arbitrage than has traditionally been assumed.

### **The impact of the Islamic State, page 27**

Although most researchers in the field see antiquities smuggling as being conducted by gangs or smugglers who also trade in drugs or weapons, the interviews from Iraq and Turkey tell a different story. Our informants described a decentralized network of individuals who worked irregularly as antiquities traffickers. Contrary to the belief that antiquities trafficking overlapped with other high-risk criminal activities (e.g., weapons or drug trafficking), our respondents were instead small-time smugglers and economic opportunists whose other trafficked goods included such mundane items as electronics, household goods, and agricultural products. Rather than being organized as formal criminal gangs, antiquities traffickers in the regions where we conducted our interviews self-organize around preexisting social and clan ties and use technology to facilitate their deals.

### **Summary, page 41**

A second observation is that the demand for their goods is quite diffuse. All participants we interviewed described an irregular supply of goods from sellers in Syria and Iraq and piecemeal sales—typically only one or two items to a single person and few repeat customers. Rather than a black market organized around central kingpins and dealers, these dynamics suggested a distributed and varied demand. This decentralized structure is evident in the important role that middlemen and brokers play. Because smugglers could not sell their products to a small number of buyers who would purchase items in bulk, brokers were required to search widely for potential buyers to make individual sales. From an enforcement perspective, the problem is dealing with very diffuse demand and a broad network with few key nodes to disrupt.

Our interviews also indicated a large local market for these goods in the neighbouring countries in the region. Goods were transported from Iraq to Iran, Turkey, Jordan, and the UAE. Although previous analysis has focused on the flow of looted goods out of the region and onward to Europe and the Americas, our research suggests that this focus on long-distance trade has overlooked and understated the scale of local demand within the region.

### **Summary, page 41-42**

In addition to the many weapons offered through these channels, the Foreign Policy article also includes the image of a worn silver coin offered for sale under a subheading “Antiquities trafficking.” The authors quote **Danti**, who observed that “[t]here is frequently overlap in the smuggling and sale of weapons and antiquities. The two illicit trades, he said, tend to share similar routes, shipments, and dealers.” Although this assumption is widely held among antiquities researchers, there is little evidence to support this conclusion. Most citations supporting this claim refer to a single original source, **U.S. Marine Corps Reserve Colonel Matthew Bogdanos’s** experiences during the Iraqi Civil War. In fact, evidence from the postings on this channel suggest that there is little overlap of these markets in online platforms.

### **Antiquities Trafficking Using Telegram, page 49-50**

As the discussions in Chapters Three and Four made clear, antiquities trafficking from Iraq and Syria is coordinated through a different structure. In the cases we

documented, trafficking networks quickly transitioned from secretive, closed networks to more-open structures in which transactions were coordinated through direct, decentralized network structures.

#### **Aligning Policy Responses with Market Characteristics, page 93**

Clear statement that illicit antiquities are trafficked via different networks from those used for drugs and weapons. This contradicts Europol Executive Director Catherine de Bolle's statement in the May 8 Art Newspaper article and Europol press release (see <https://bit.ly/3dKWweT> and <https://bit.ly/2WVViql>)

"Our aggregate data suggest that the market for all antiquities, both licit and illicit, is on the order of, at most, a few hundred million dollars annually rather than the billions of dollars claimed in some other estimates ... We believe that, going forward, scholars arguing that the illicit market is larger than we suggest here will need to more clearly articulate the means through which these goods are sold."

#### **Summary, page 84-85**

Because the high end of the market is the most often examined, many assumptions about the rest of the market are based on the high end. Yet several of these assumptions fail to hold when it comes to the rest of the market.

#### **The Middle- and Low-End Market, page 127**

#### **Fakes**

Maamoun Abdulkarim, Directorate-General for Antiquities and Museums in Syria, said the percentage of fakes among looted antiquities seized in Syria and Lebanon had risen from 30 percent to 70 percent in the past three years. As he explained, "Hoaxers are exploiting the growing black market in Middle Eastern antiquities by creating fake artifacts to dupe unsuspecting collectors."

#### **Fakes and Forgeries, page 39**

Perhaps more striking [about sales on eBay] is the high volume of sales from Thailand, a country not typically associated with Roman antiquity. An analysis of a sample of the individual sales suggest that many, or perhaps most, of these the items are fake.

#### **Online auction markets, page 80-81**

The services of these forgers are in high demand; by some estimates, as much as 80 percent of the coins and other artifacts exported from Bulgaria are forgeries. One factor in the increased volume of forgeries is that the vast majority of archaeological sites in Bulgaria have already been extensively plundered, especially the upper archaeological layer in the top 12 inches to 16 inches of soil. As looters provide fewer original artifacts to their middlemen, criminal networks have attempted to compensate for the reduced supply with forgeries.

#### **Actors, Networks, and Markets in Bulgaria, page 109**

### **Little to no evidence of trafficking via the dark web**

We find no evidence that illegal sales are occurring in large or even steady quantities on deep web platforms, such as Facebook or Telegram, and we find virtually no evidence of antiquities being traded on the dark web.

**Findings, page xii**

Technology used in the looted antiquities trade is mostly unsophisticated. Studies of other illegal goods suggest that the dark web would be a natural place to sell looted antiquities. However, our analysis of dark web platforms finds virtually no evidence of antiquities sales. On deep web platforms, such as Telegram and Facebook, we also find little evidence of antiquities sales, although other secure messaging applications, such as WhatsApp and Viber, are used to coordinate sales and streamline communications within existing networks. We agree with other researchers who have concluded that the low level of enforcement and the existence of low-risk sales channels reduces the need for dark or deep web sales of antiquities.

**Findings, page xiii**

Despite the arguments forwarded by antiquities blogger Katie Paul [*co-author of the ATHAR Project looking in to Facebook and other social media platforms*], who has assumed that the few examples of deep web or cryptocurrency transactions she has found are evidence of a more extensive hidden market, we find no evidence that the dark web hosts more than a trivial market for these goods. Instead, we conclude, as Neil Brodie has observed, that there is also “no need to use the darknet when trafficked antiquities can be sold openly on publicly accessible websites with seemingly little risk to the vendors.”

**Antiquities Trafficking Online, page 43**

Online markets and discussion forums are some of the most visible elements of the antiquities trafficking supply chain, but we must be careful not to overstate their importance simply because they are more easily tracked than the interpersonal networks described in Chapter Three.

**Antiquities Trafficking Online, page 43**

We do not find any evidence of these marketplaces being used to traffic antiquities. However, because we cannot directly prove the null hypothesis that there is no largescale antiquities trading on the dark web, we instead ask about the dark web’s value to the trade and demonstrate that these features are poorly aligned with the illicit antiquities market. Although it provides anonymity and security, the dark web also limits the size of the audience that sellers can reach by requiring that they access a site using specific browsing software and a specific connection protocol. Moreover, because many dark web sites are not indexed and searchable, potential buyers cannot easily find the goods they are looking for unless they know where to look. Finally, the anonymity afforded by these sites also limits the establishment of trust between buyers and sellers through identity-based reputation. These features impose transaction costs that make the dark web a poor match for most categories of transactions.

**Dark and Deep Websites for Antiquities Sales, page 44**

Traders in these [*dark web*] markets estimate that drug sales account for 90 percent of all goods sold, with guns making up another 5 percent.

#### **Dark and Deep Websites for Antiquities Sales, page 45**

When we analyzed the postings for antiquities, we found that no art, antiquities, or coinage were listed for sale among the current postings on Hydra [*Russia's leading dark web site*]. A more systematic search of archived postings on dark web marketplaces likewise failed to find evidence that these markets were used as a channel for antiquities sales. Analysis of two years of postings on Dream Market, one of the largest dark web marketplaces, also failed to reveal postings for art or antiquities... Searches for a standard battery of antiquities-related word stems yielded only drug paraphernalia with ancient-looking designs. No ancient coins were indicated—only a handful of modern coins or coins advertised as forgeries of modern coins were listed.

#### **Dark and Deep Websites for Antiquities Sales, page 46**

The list of languages and the findings [on the *dark web*] are presented as follows:

- Arabic No art, antiquities, or coinage
- Kurdish No art, antiquities, or coinage
- Turkish No art, antiquities, or coinage
- Persian No art, antiquities, or coinage
- Hebrew No art, antiquities, or coinage
- Greek No art, antiquities, or coinage
- Bulgarian No art, antiquities, or coinage
- Russian No art, antiquities, or coinage
- German No art, antiquities, or coinage
- English No art, antiquities, or coinage.

Although the results of these searches are not definitive because of the necessarily incomplete coverage of the dark web provided by aggregators such as Sixgill, there is no evidence that the dark web serves as a platform for antiquities transactions.

#### **Dark and Deep Websites for Antiquities Sales, page 47**

**(For similar conclusions about Telegram, see page 51)**

As noted in our analysis, the dark web is not well suited to the demands of the antiquities market; the limited audience, the high transaction costs relative to the value provided, and the need for in-person inspection of goods limit the utility of these platforms for antiquities dealers.

#### **Structural Analysis of Online Markets, page 64**

Our analysis found little evidence of antiquities sales in dark web forums or through Telegram channels.

#### **Summary, page 67**

### **Facebook**

Many of the largest [Facebook] groups operate as voyeuristic lifestyle sites, where users would share glamorous images of gold artifacts, treasures, and valuable antiquities, with occasional accounts of treasure-hunting explorations of finds that make the riches

seem attainable. The group projected the idea that this was a world in which treasure hunting—looting—could yield wealth within easy reach.

This curated image is largely an illusion. Using Google’s reverse-image search quickly reveals that the majority of the images posted on these groups are actually recycled images from news articles and museum websites. Similarly, images that show gold artifacts still buried in the ground are often photos from professional archaeological excavations or stock photographs (Figures 4.3–4.4).

#### **Antiquities Trafficking on Arabic-Language Facebook Groups, page 54**

Finally, there is no strong evidence that the goods being offered are illicitly obtained. They are better understood as buy side advertisements in which collectors or dealers interested in certain types of goods can easily canvass a large population of other users.

#### **Artifacts for Sale, page 60**

Specifically, we found that Facebook is a prominent hub for discussions of antiquities, which may be driving interest in looting by highlighting the wealth that it purportedly generates. By promoting and normalizing looting in Arabic-language groups, Facebook has the potential to drive looting even if there is not sufficient demand in the market to sell the looted goods.

#### **Summary, page 67**

#### **Inaccurate assumptions about end markets**

The end market for looted antiquities is not only the West. It is often assumed that the end market for looted antiquities is the Europe and the United States. But our informant interviews suggest that antiquities from the Middle East and Levant are ending up in Iran, Turkey, the Persian Gulf States, and other nearby countries. Furthermore, the prices being paid to middlemen for low- or medium-quality goods are on par with what would be paid in the end market in Europe or North America. These observations are contrary to the assumption that middlemen are paid just a fraction of the final price as they help in moving antiquities to Europe or the United States. The implication of this finding is that it is important to tailor policy responses to the situation if, indeed, the supply chains for certain goods are different from what has been assumed.

#### **Findings, page xii**

Highlights Martin Chulov \$36 million claim and associated problems

#### **Issues with the Current Approach for Assessing the Antiquities Market’s Relationship to Terrorist Funding, page 10-11**

#### **Weak demand in licit market and its effect on illicit sales**

Moreover, 25 percent of all the items offered at auction were not sold, either because there was no bidder or because the reserve price was not met. Although news stories have called attention to looted items that have appeared at auction over the past several decades, the statistics for the overall market suggest that auctions could act only



as a limited conduit for illicit sales.

### **Measuring the international trade in antiquities, page 73**

Moreover, interviews with antiquities dealers in both the United States and Europe and non-systematic surveys of their collections both in person and online suggested that the turnover of their stock was relatively slow.

### **Measuring the international trade in antiquities, page 73**

While researchers have often assumed that looting is feeding an unmet demand for antiquities on the open market, this view is inconsistent with the auctions data that we collected. Rather than finding that antiquities are “highly prized as investments and status items [for which] demand exceeds the modest legal supply,” we found instead a market in which sellers struggled to find buyers.

### **Online auction markets, page 73**

One takeaway from our analysis is that the difficulty of marketing and selling classical art and artifacts should not be understated. Much of the analysis in the field that has focused on the illicit supply of looted artifacts has assumed that they are easily sold.

### **Summary, page 84**

...our analysis suggests that it is unlikely that large volumes of looted antiquities are being sold through observable channels in Europe or the Americas.

### **Summary, page 85**

### **Evidence of poor analysis**

Although research by reporters and academics has documented an increase in the looting of antiquities as a potential source of revenue that can be tapped by opportunistic actors in the Middle East, little systematic analysis has attempted to empirically describe and measure the entire process of looting and trafficking in the region.

### **Introduction, page 2**

Surveys using satellite imagery, for example, have traced the scale and progress of the looting of historic sites in great detail, but remote sensing cannot describe the goods found or trace their fate.

### **Introduction, page 2**

...relatively little analysis has focused on the problem of where the looted antiquities go, what markets exist for the looted material, or what the size of these markets might be. News stories have identified individual suspicious antiquities for sale or reported on prominent seizures and legal cases, but there has been little systematic analysis of the market as a whole.

### **Introduction, page 2**

Yet the scale, scope, and significance of the antiquities trade and its role in terrorist, criminal, and militant financing remains poorly understood.

**Issues with the Current Approach for Assessing the Antiquities  
Market's Relationship to Terrorist Funding, page 7**

These ambiguities compound the practical objective of distinguishing between licit and illicit items in that establishing authenticity, provenance, and ownership are tasks that require specialized knowledge beyond most police and customs officers' standard training.

**Issues with the Current Approach for Assessing the Antiquities  
Market's Relationship to Terrorist Funding, page 8**

Indeed, no governmental or international body maintains comprehensive statistics on the global antiquities trade, and there has been little effort to reconcile differences between national statistics, which are often collected based on the mechanism of the theft (e.g., armed robbery, petty theft, breaking and entering) rather than category of object stolen

**Issues with the Current Approach for Assessing the Antiquities  
Market's Relationship to Terrorist Funding, page 8**

Yet the available research also suffers from several analytical weaknesses. (Refers to research by ICOM, American Schools of Oriental Research Cultural Heritage Initiative (ASOR CHI) and the Antiquities Coalition).

**Issues with the Current Approach for Assessing the Antiquities  
Market's Relationship to Terrorist Funding, page 9**

Yet research designs in the field are often poor, producing a fragmented body of case studies and an overreliance on anecdotal data

**Issues with the Current Approach for Assessing the Antiquities  
Market's Relationship to Terrorist Funding, page 10**

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**Issues with the Current Approach for Assessing the Antiquities  
Market's Relationship to Terrorist Funding, page 11**

The fundamental problem, as **Deborah Lehr** of the **Antiquities Coalition** has observed, is that, as with most illicit markets, "there's no real information or statistics on the size of this illegal trade." However, this lack of data has not diminished the spread of wildly varying estimates about the size of the antiquities market.

**Issues with the Current Approach for Assessing the Antiquities  
Market's Relationship to Terrorist Funding, page 11**

Although it is clear that numerous groups have been looting museums and historic sites in Iraq, Syria, Egypt, Libya, and elsewhere in the interest of profit, the later stages of the supply chain for illicit antiquities remain poorly understood.

**Issues with the Current Approach for Assessing the Antiquities  
Market's Relationship to Terrorist Funding, page 16**

Despite growing public outcry about the scale of looting in Middle East conflict zones and increased policy interest in the use of antiquities looting as a source of terrorism finance, there is little hard data available about the size of the illicit trade. Moreover, comprehensive statistics that describe the legal global antiquities trade do not exist.

### **Constructing a Global View of the Antiquities Trade, page 16**

Because our focus is on the antiquities trade, this coding system presents a challenge: There is no single product category under which antiquities fall. Rather, these items are captured by various codes that must be combined to capture the portion of the market that interests us. Harmonized code 97, for example, measures the trade in all art objects, combining sales of antiques with sales of sculpture and art objects produced more recently. More-focused four-digit codes—such as 9703 (statues and sculptures), 9705 (ethnographic and archaeological objects), and 9706 (antiques)—offer finer divisions in the data that more closely match our interest in antiquities. For this analysis, we combine the data for codes 9705 and 9706 on the grounds that they directly measure items that are considered “old.” Although a useful first step, the combined category still includes some antique items that are more recent than the antiquities that interest us, while excluding such items as statues that may have been categorized differently. For the sake of clarity, we refer to these goods as antiquities in the following text, but we should not lose sight of the limitations and definitions of the data behind this label. Despite these deficiencies, the advantage of these data is that we are aware of the limitations upfront and could in principle make further adjustments and refinements to arrive at a more accurate measure.

### **Challenges in Using Import and Export Transactions Data, page 16-17**

“Our aggregate data suggest that the market for all antiquities, both licit and illicit, is on the order of, at most, a few hundred million dollars annually rather than the billions of dollars claimed in some other estimates ... We believe that, going forward, scholars arguing that the illicit market is larger than we suggest here will need to more clearly articulate the means through which these goods are sold.”

### **Summary, page 84-85**

#### **Inaccurate analysis leading to poor policy**

In lieu of reliable evidence on these two fronts, the conversation has been dominated by speculation and hypotheses and has generated some widely accepted theories of how the illicit antiquities market operates. – **Summary, page xi**

In summary, our analyses suggest that the market for looted antiquities is smaller, is more geographically dispersed, and has more-fragmented supply chains than media accounts have typically indicated. The result is that, to the extent that policy solutions have been guided by these beliefs, existing policy frameworks may be poorly suited to addressing the decentralized nature of the problem.

### **Policy Responses Based on Findings, page xiii**

Although existing policy responses have focused on formal legal strategies that would be most effective against a large market geared toward buyers in Europe and the

Americas, our evidence points to a smaller but more diffuse market than some have previously hypothesized. These findings suggest that current policy responses to illicit trafficking may be misfocused. We argue instead for policy responses that address a decentralized network that relies heavily on trust and communications between buyers and sellers who do not have an ongoing personal relationship. Accordingly, a broad approach aimed at undermining the strength of the network as a whole may be more successful.

#### **Policy Responses Based on Findings, page xiii**

Highlights Interpol drugs, weapons and cultural property claim and associated problems  
**Issues with the Current Approach for Assessing the Antiquities Market's Relationship to Terrorist Funding, page 11**

In addition to the many weapons offered through these channels, the Foreign Policy article also includes the image of a worn silver coin offered for sale under a subheading "Antiquities trafficking." The authors quote **Danti**, who observed that "[t]here is frequently overlap in the smuggling and sale of weapons and antiquities. The two illicit trades, he said, tend to share similar routes, shipments, and dealers." Although this assumption is widely held among antiquities researchers, there is little evidence to support this conclusion. Most citations supporting this claim refer to a single original source, **U.S. Marine Corps Reserve Colonel Matthew Bogdanos's** experiences during the Iraqi Civil War. In fact, evidence from the postings on this channel suggest that there is little overlap of these markets in online platforms.

#### **Antiquities Trafficking Using Telegram, page 49-50**

It is unclear whether there is any relation between the spike in antiquities exports from the Middle East described in the WITS data and the increase in sales at auction. The fact that auction sales began to increase in 2011 while exports from the region did not begin to increase until after the rise of the Islamic State in 2012 suggests that there is no direct relationship between the two.

#### **Measuring the international trade in antiquities, page 72**

As the discussions in Chapters Three and Four made clear, antiquities trafficking from Iraq and Syria is coordinated through a different structure. In the cases we documented, trafficking networks quickly transitioned from secretive, closed networks to more-open structures in which transactions were coordinated through direct, decentralized network structures.

#### **Aligning Policy Responses with Market Characteristics, page 93**

Clear statement that illicit antiquities are trafficked via different networks from those used for drugs and weapons. This contradicts Europol Executive Director Catherine de Bolle's statement in the May 8 Art Newspaper article and Europol press release (see <https://bit.ly/3dKWweT> and <https://bit.ly/2WVViqJ>)

For high-value goods and key nodes in the network, efforts by police and customs officials can successfully identify and prosecute criminal actors. However, these enforcement actions are time consuming, costly, and often require significant cross-border cooperation by law-enforcement agencies, which can often be difficult to organize. Instead, a broader-based approach aimed at undermining the trust among

illicit actors and in the technologies they rely on could disrupt the illicit market more broadly and cheaply.

#### **Responding to Illicit Networks, page 96**

These are important questions to answer to develop an effective global response to antiquities trafficking networks. Rather than rely on speculation and anecdote, which can lead to mistaken analyses and ill-informed policies, this report will contribute to the growing conversation about evidence-based policy solutions for fighting the illicit antiquities trade and mitigating the destruction of ancient sites around the world.

#### **Directions for Future Research, page 97**

Yet the Ottoman authorities had neither the determination nor the capacity to enforce the laws' ambitious regulations. The empire's territorial expanse prohibited effective monitoring, and foreign excavators, accustomed to unfettered access and frustrated with the pace of the permitting process, often discovered that provincial governors were willing to turn a blind eye to their activities. The result was a complex network of smuggling routes that stretched across the eastern Mediterranean and lay the foundation for the illicit trade in Middle Eastern antiquities today.

#### **Case Study 1: Looting in Iraq and Syria, page 99**

#### **Realistic and unrealistic approaches to solutions**

However, the opportunity for legal exports and the codification of harsh penalties also produced a decline in theft, site destruction, and illicit excavations. [ref to Gertrude Bell and the introduction of licensed export from Iraq via Antiques Law No. 40 of 1924].

#### **Mandate Era, 1918–1948, page 100**

Toward this end, the Syrian government also exercised strict oversight of the sale and export of archaeological objects, and ownership of artifacts discovered during this period was frequently split between the newly formed Museum at Aleppo and the Louvre in Paris. As a result, archaeological activity in Syria lagged behind that in Iraq, and illegal digging remained a localized phenomenon.

#### **Mandate Era, 1918–1948, page 101**

#### **Ethics and reliability of research**

**Katie A. Paul**, "Ancient Artifacts vs. Digital Artifacts: New Tools for Unmasking the Sale of Illicit Antiquities on the Dark Web," Arts, Vol. 7, No. 2, February 2018. It must be noted that Paul's article includes data and screenshots obtained with a RAND login to a third-party data provider that were published without consultation or permission. While unfortunate and ethically dubious, we note this to clarify that Paul's article is based on a subset of the data reviewed for this report, and her paper does not include access to data that was unavailable to us.

#### **Footnote, page 43**

### **Self-policing in the market**

Although there are many factors that could account for this difference, it is likely that one important factor is the premium that collectors place on provenance, both as a sign of authenticity and as an assurance that the items were not looted and can be bought with a clear title. By this calculus, newer goods are discounted by the market because of the greater uncertainty that surrounds their authenticity and legality.

### **Measuring the international trade in antiquities, page 72**

### **Proposed solutions**

...if the market is instead made up of ad hoc opportunists, then there are few centralized nodes that can be targeted to disrupt the whole market. Moreover, expensive and resource-intensive investigations may be inefficient in a market comprising small-scale dealers. In such cases, broader-based disruption tactics, which highlight the risks involved or publicize the damages that looting causes, might be more effective by reshaping the decisions of the individual actors involved.

### **Proposed New Policy Solutions Based on Findings, page 91**

Instead, we find that buyers within the Middle East may play a substantial role in the market; moreover, our analysis of the geographical origin of eBay listings suggests that the sale of antiquities (whether authentic or not) is a global enterprise. In this case, focused interventions will necessarily have a limited impact because of the variety of end markets and dealers that participate in the market. In this case, a broader-based disruption strategy would be required to disrupt the illicit trade.

### **Proposed New Policy Solutions Based on Findings, page 91-92**

Messaging campaigns conducted online—for example, through Facebook groups that are used by illicit actors along the supply chain (as discussed in Chapter Four)—would allow destabilizing information to be injected into trafficking networks.

### **Responding to Illicit Networks, page 96**

### **Additional points**

Legal standards can be troublesome because a plethora of various laws exist between and within countries, meaning that the correct legal standard that must be met can vary from object to object. This difficulty is compounded by the lack of information about findspots because a different law might apply if an object came from, for instance, Turkey versus Greece. As we will detail in this section, objects' findspots can rarely be traced to a particular country, because ancient empires spanned modern borders and because ancient trade routes brought various types of objects far from their point of creation.

### **Major Limitations in the Auction Market, page 111**

**Illustrates what the market has been arguing for years, while policy makers have ignored this**

The Convention prohibits the sale of cultural items that left their country of origin after 1970.

**Major Limitations in the Auction Market, page 112**

**Misinterpretation of the UNESCO Convention**

...the location of an object's creation in antiquity is not necessarily the same as its findspot in modern times. For example, the creation of certain vases signed by the painter or potter can be traced to Athens thanks to the style and signature; yet they have been discovered all over the Mediterranean—from Italy to Asia Minor.

**Major Limitations in the Auction Market, page 112**

**Acknowledges the extent of trade in ancient times**

As for other antiquities, ancient trade routes meant that coins could be widely dispersed. Coins from the Rome mint, for example, have been found as far away as present-day England or Iraq.

**Major Limitations in the Auction Market, page 113**

**Acknowledges the extent of trade in ancient times**

**Methodology**

We gathered data about antiquities sales by major auction houses by collecting data from all available online auction catalogues for the auction houses that are members of the International Association of Dealers of Ancient Art. From this larger data set, we focused our analysis on only the three largest houses—Bonhams, Sotheby's, and Christie's—because smaller firms did not list all their sales online. We collected data on 21,020 successful sales that, after excluding the handful of famous pieces that sold for more than \$10 million, averaged about \$21,300.

**Measuring the international trade in antiquities, page 71**