



### **Global Heritage Alliance challenges terms and conditions of MoUs with Cambodia and Uzbekistan**

Global Heritage Alliance, the US-based advocacy organisation for collectors, museums and the trade in archaeological and ethnological objects, has called for a review of the terms and conditions of US bilateral agreements with Cambodia and Uzbekistan.

GHA believes that Memoranda of Understanding (MoU) go too far because they are being exploited for diplomatic, economic and military purposes rather than being restricted to the terms of the ruling Cultural Property Implementation Act (CPIA).

Submitted to the Cultural Property Advisory Committee (CPAC) in Washington, which directly advises the State department, the GHA document calls for any renewal of the Memoranda of Understanding (MoU) to trim back the “overbroad designated list” of items subject to the agreements and to hold the other nations “accountable to reasonable benchmarks that address congressionally mandated self-help measures”.

Essentially, GHA argues that the harnessing of MoUs for purposes beyond cultural policy ignores constraints stipulated under the CPIA. It also argues that while the Act is drafted to protect people and organisations from unreasonable demands by overseas authoritarian governments who declare everything as state property, these provisions are being ignored in practice.

Instead of import restrictions under the MoUs being restricted to “archaeological and ethnological artifacts of ‘cultural significance’”, they impose blanket coverage on items from deepest history almost to the modern day.

Regarding the responsibility of source nations, GHA points out that Cambodia “is beset with serious corruption that directly impacts the cultural heritage sector, particularly the Angkor Wat archaeological park, a cash cow for the Cambodian economy”.

“CPAC has both the independence and the legal obligation to investigate whether Cambodia’s ‘self-help’ policies are actually in compliance with the requirements of U.S. law,” GHA argues. “It is hardly an example of “self-help” to design “cultural preservation” to enrich private investors in tourism – at the expense of the living cultural and religious traditions of Cambodia’s poorer citizens and while abusing their basic human rights.”

GHA has submitted [similar documents](#) over the past few years.

### **Archaeologists in the U.K. Have Turned Up 34 Semi-Precious Stones in the Drain of an Ancient Roman Bathhouse**

Artnet News: January 31: Archaeologists have unearthed 34 engraved precious stones on the site of a Roman bathhouse near Carlisle in Cumbria, north-west England. Cut from amethyst, jasper and cornelian, the intaglios date to the 3<sup>rd</sup> century AD.

“We believe they were lost as a result of the hot, steamy, and wet environment of a Roman bathhouse,” Frank Giecco, the technical director of engineering consultancy Wardell Armstrong who led the dig, told *Artnet News*.

“Gems might easily become detached from signet rings, or the entire ring detached from the finger and washed down the drain.”



A Cornelian intaglio showing Fortuna holding a cornucopia – one of the 34 finds. Image: @Annegiecco on Instagram

### **Harvard Law Review picks antiquities theft sleuth as new president**

Reuters: January 31: The Harvard Law Review has appointed Aspara Iyer as its president, the first Indian American woman to hold the post in the review's 136-year history.

Billed as a person who is "dedicated to investigating art and antiquities theft", Iyer hails from the New York District Attorney's Antiquities Trafficking Unit, where she worked under Assistant D.A. Matthew Bogdanos, and has helped repatriate more than 1,100 works of art to 15 countries.

### **La Brafa amputee (Amputated BRAFA)**

L'Echo: February 1: The antiquities trade has pulled out of BRAFA entirely in protest at vexatious seizures and accompanying publicity by the authorities at previous fairs.

In an email to BRAFA President Harold T'kint on October 3 representatives of the six exhibitors involved accused the authorities of implementing a policy of entrapment. They complained that investigators attended the fair before and during its opening to take photographs of works exhibited, then sent these images to countries where they assumed these works had originated to induce them to make a claim for them.

They also complained that vetting files supplied to the authorities led to them seizing objects, claiming they were fake, and leaking details of the seizures to the media accompanied by descriptions of the exhibitors and the wider antiquities trade as thugs.

Cultural property lawyer Maître Yves-Bernard Debie, who represents several exhibitors, said: "BRAFA is a [serious] investment [for exhibitors]; participation is expensive: stands, lighting, transport, photos, labels, catalogues, accommodation, etc. Then, hostile investigators question you in front of your clients, seize objects, so you have to hire a lawyer, and then you are interrogated and thrown to the press..."

Maître Debie added that if exhibits were seized following a complaint, then the authorities should proceed with a prosecution on the basis of evidence. Instead, investigators confiscate first then ask questions later, in what amounts to a fishing expedition.

What makes the challenge for the honest exhibitor even more difficult is that countries who decide to make a claim after being courted by the authorities don't have to prove anything, while the exhibitor may face criminal proceedings.

It can take years for dealers to retrieve seized items, but even when they are finally released after months when the investigation uncovers nothing wrong with them, the damage is done.

Returns garner little or no publicity, certainly not compared to widely publicised seizures.

Now the antiquities trade has had enough, both of being harassed by the authorities and abandoned by the fair, which has charged them substantial sums for exhibiting there.

As Maître Debie states, Brussels is the big loser as exhibitors move to Paris or Maastricht.

So how should investigators proceed? "As elsewhere in Europe: with discretion!" says Maître Debie. If the exhibitor has the right paperwork showing an object's origins they should be left alone; if the authorities identify an infringement, they can proceed with an investigation.

"Otherwise, it would be like seizing your car and demanding proof that you had not been guilty of speeding in the previous five years. Moreover, we must put an end to the presumption that any work of ancient Egyptian art is an illicit export and property, for example, of the Egyptian State."

As Debie notes, the Belgian authorities prioritise the claims of foreign countries who are often incapable of protecting their own heritage; these countries have previously authorised exports that they now declare "illicit" as they try to reclaim objects exported legally centuries or even millennia earlier.

BRAFA's lawyer, Jean-Pierre Buyle, responded, saying that "art dealers or organisers and exhibitors of fairs, subject to AML anti-money laundering regulations, face controls, which should be coordinated and regular in Europe".

He added that while exhibitors should be displaying “irreproachable” objects, it was “unfortunate” that recent investigations were conducted on legal bases that were too random, while claims from countries like Iran lacked credibility.

“A dialogue between professionals and the authorities remains essential,” he concluded. “BRAFA is working constructively with the authorities to establish procedures allowing galleries and authorities to operate more calmly.”

### **Le marchand: «Après cinq ans d'enquête, aucun antiquaire belge n'a été condamné»**

Le Soir: February 11: Patrick Mesdagh, President of Belgium's Chambre des antiquaires, has made a stand against the attacks on BRAFA in the wake of antiquities dealers boycotting the 2023 fair.

Accusing law enforcement of not playing by the rules even as the trade does, he acknowledges that controls are necessary but must be fair.

“The rules and laws must be applied and respected by the trader and the collector. But also, by the inspectors of the SFP Economy, who do not [respect them]”, he says.

“Today, we are in a situation where we are faced with the reversal of the burden of proof. At Brafa, inspectors photograph exhibits and then ask the supposed States of origin whether these pieces arrived at the fair illegally. We reverse everything: we designate someone a criminal, then we look for the crime. This is unacceptable.”

Mesdagh also condemned the constant linking of the trade with terrorism financing: “We have to stop lying about these stories of international trafficking of archaeological pieces to finance terrorism. All serious studies demonstrate this traffic does not exist... We need to stop with this fake news.”

### **Questions Loom About Vatican Monsignor's Collection Following His Death**

ARTNews: February 2: The return of the Euphronios Krater to Italy in 2008 is arguably the most celebrated case of repatriation involving antiquities. The ancient Greek terracotta wine vase was made around 515 B.C. and has always been thought as the only survivor of 27 such vessels created by Euphronios, a vase painter and potter of much repute.

The restitution resulted from the decision, based on Italian court records, that the krater had been illegally excavated from an Etruscan city in December 1971. Just under a year later, an American antiquities dealer living in Rome, Robert E. Hecht, sold it to the Metropolitan Museum of Art in New York for \$1.2m. Hecht said he had acquired the piece from Lebanese dealer Dikran Sarrafian, whose family had owned it since the 1920s. However, the suspicion was that Hecht had really bought it from Giacomo Medici, a dealer later convicted of offences related to looting. This led to the agreement for the krater to be returned to Italy.

Now the apparent certainty over the krater's status as looted art has been thrown into doubt. The death of Vatican official Monsignor Michele Basso, a man once investigated by the Roman government for allegedly trying to sell counterfeit antiquities and paintings, has led to the subject being thrust back into the spotlight.

In 2020, Basso donated his entire collection of around 70 pieces, ranging from paintings to sculpture to antiquities, to the organization responsible for restoring St. Peter's Basilica, the Fabbrica di San Pietro.

Among that collection is a copy of the krater that has been dated to the 19th century. If it is a copy, then the original must have been available at the time of the copy's creation, suggesting that it was excavated before 1909, when Italy banned the export important cultural items.

ARTnews reports that some even believe that Basso's may be the original. Either way, it raises the possibility that the repatriation of the Euphronios Krater was based on false information. If so, the Met museum might have a case for claiming it back.

### **A French Court Has Refused to Drop Antiquities Smuggling Charges Against Ex-Louvre Director Jean-Luc Martinez**

Artnet News: February 3: Despite the French public prosecutor's advice for the courts to drop the charges against former Louvre director Jean-Luc Martinez and curator Jean-Francois Charnier, relating to the Louvre Abu Dhabi scandal, judges have decided to press ahead anyway. The decision is all but unprecedented.

"The prosecutor's decision was seen as a rare indication an error may have been committed in implicating the museum workers, who spent much of their careers raising awareness around the dangers of plundering archaeological sites," *Artnet News* reports.

So far, no indication as to why the judges have gone against their own prosecutor's advice has arisen.

As IADAA reported in September 2022, cracks had already begun to appear in the case against Martinez and Charnier, with further indications in November that the charges would be dropped.

### **Raiders of the Lost Art**

Brown Political Review: February 5: One of the more bizarre articles to emerge recently, this is a jumble of ill-informed observations and unsubstantiated claims backed by confused logic and conflicting arguments.

*Brown Political Review* is an entirely student-written and run 'nonpartisan' magazine for political journalism. A student publication it may be, but it is still influential and should demand higher standards of its writers than this, especially on such a sensitive subject. Evidence to support its claims would be a start.

Attention to detail is on the slide from the off where fictional characters the author, Grace Chaikin, Associate Editor of the Review, describes as 'valiant archaeologists' are in fact looters: Indiana Jones and Lara (here called Laura) Croft, the noted 'Tomb Raider'.

Throwaway claims soon follow, such as "Conflict antiquities – cultural heritage items used to finance insurgencies, war and terrorism – are consumed by local, regional, and global markets within the underbelly of the art and antiquities trade." Chaikin offers no examples of such terrorism funding, probably because no one else has been able to find any so far.

Next comes the complaint that media coverage "disproportionately" emphasizes the destruction of artefacts rather than the "systemic" issue of looted antiquities, a claim immediately undermined by the author's own acknowledgement that "conflict antiquities make up only a small portion of the black market's pernicious profits".

Further claims follow of "a sophisticated network of global antiquity dealers connecting buyers to artifacts", and "key middlemen of the trade, high-class art and antiquities brokers" sourcing "looted relics behind the facade of genuine archeological work".

Again, Chaikin immediately undermines her wild claims by highlighting how difficult it is to trade in antiquities (for once quoting a reliable source, [The Rand Report](#)): "The difficulty of marketing and selling classical art and artifacts has created a need for such brokers. Even in well-advertised private auctions for museum-quality goods, 25 percent of the lots typically fail to sell." This hardly makes an attractive proposition for criminals.

The article then cites the lack of evidence and poor effort on the part of law enforcement to catch thieves as affording impunity to dealers. The trade really can't win here.

Perhaps most jaw-dropping is Chaikin's claim about the trade's influence on decision makers: "Further compounding the issue, these influential intermediaries often establish mutually beneficial relationships with powerful elites, like politicians, that insulate their operations from scrutiny and large-scale regulation." As anyone who has even the slightest understanding of this market knows, it is the anti-trade lobby that holds sway by some distance in the corridors of power, from New York and Washington to the Bundestag, not the trade.

The thread continues: “In recent years, antiquity dealers of New York City and London have organized and elected interest group representatives, which utilize lobbying power to dismantle regulation or prohibition attempts by archaeologists and other academics.” Unfortunately, the embedded link (included above) revealing who these people are does not work, but it seems to be an objection to the trade defending itself against calumny, while Chaikin seems not to have heard about the long-running siege that New York dealers have endured at the hands of the District Attorney’s office. She goes on to cite the Steinhardt case, like so many anti-trade campaigners, firming up evidence to claim definitively that his entire collection was looted when no such evidence has been produced.

The fantasy continues: “These enforcement actions are time consuming, costly, and often require significant cross-border cooperation by law enforcement agencies—so difficult to organize and execute that they rarely occur.” She appears not have heard about the seven or more multi-national operations (Odysseus, Athena, Pandora etc) carried out since 2014 despite countless headlines generated by Europol and Interpol media releases.

Next, we are informed that only low-level self-regulatory initiatives remain – a bizarre claim ignoring numerous recent hard-hitting laws in the European Union, Germany and the UK, with historic laws in the United States and elsewhere.

The article goes on to demand dealer licensing, demonstrating a complete lack of understanding as to why this oft-discussed subject would not work. It ends in irony, demanding “evidence-based solutions”, a standard the author does not apparently feel obliged to meet herself.

### ***An Amateur Metal Detectorist in the U.K. Has Struck History-Lover’s Gold: A 16th-Century Pendant With Links to King Henry VIII***

Artnet News: February 8: Judged to be the most important Tudor find for 25 years, the extraordinary discovery of a gold chain and pendant hit the news this month.

Metal detectorist Charlie Clarke was searching on a friend’s property in Warwickshire, England, when he found the heart-shaped gold pendant attached to a gold chain.

Apart from its exceptional condition and workmanship, the elaborate piece carried the initials “H” and “K” to the reverse of the pendant – as it turned out they referred to Henry and Katherine. What he had unearthed was a jewel created to mark the marriage of Henry VIII to Katherine of Aragon, which lasted from 1509-33.

With the find reported under the Portable Antiquities Scheme, the British Museum dated the piece to around 1521. The front of the pendant is decorated with a Tudor rose, the emblem for the House of Tudor, entwined with a pomegranate bush, the badge of Katherine of Aragon; underneath, the legend “+ TOVS + IORS” offers a pun on *toujours*, the French word for “always”.

The “H” and “K” initials are inscribed in red and white enamel, in Lombardic script with decorative lacing common throughout the 16th century.



The gold chain and pendant relating to Henry VIII and Katherine of Aragon (c.1521).

Photos: © The Trustees of the British Museum



What cannot be determined is who commissioned the pendant, but its sheer quality means that it would have been someone of high standing, probably a courtier.

### **Greece approves disputed museum law seen as antiquity 'export' plan**

France 24: February 13: The Greek parliament has approved a law allowing antiquities to leave the country on loan to other nations for exhibitions. "Culture Minister Lina Mendoni has said the changes give the museums more freedom to plan exhibits and raise sponsorship."

It could also be just the move needed to loosen the British Museum's grip on the Parthenon Marbles, in line with BM chairman George Osbourne's vision of long-term loan swaps of artefacts.

Not everyone is happy with the law change, however. The association of Greek archaeologists has said it will block the law in court.

"Important antiquities could be sent abroad for 50, a hundred years or more," the association warned in a statement.

### **With Charges Upheld in Louvre Trafficking Case, Should Major Institutions Reconsider Acquisitions of Egyptian Antiquities?**

ARTNews: February 14: Focusing on the fallout of the Louvre Abu Dhabi scandal, this piece of analysis concludes that whatever the outcome it will be damaging to France's harnessing of cultural heritage for soft power diplomacy.

The result so far is a new report published in November which is considering establishing a new committee dedicated to provenance research for public institutions: "Recent events question the quality of acquisition procedures and the functioning of its market. A reaction is necessary to guarantee France's capacity for influence in the cultural and heritage domain."

### **Crime of the Centuries Tomb raiders, crooked art dealers, and museum curators fed Michael Steinhardt's addiction to antiquities. Many were also stolen.**

Intelligencer: February 15: This is a highly detailed account of the Steinhardt investigation, much of which has been aired before. However, of additional interest is a clear description of how a deal between Steinhardt and the authorities was forged, allowing the Manhattan District Attorney's Antiquities Trafficking Unit under Assistant District Attorney Matthew Bogdanos to repatriate the 180 artefacts despite not being able to show that they had been stolen or trafficked. The passage is worth quoting in full:

"In the end, the ATU determined it could prove beyond a reasonable doubt that 180 objects in Steinhardt's collection had been stolen. Together, the pieces were valued at some \$70 million. "Still, the number of artifacts left Bogdanos and the DA's office with a difficult decision. To charge Steinhardt with possession of stolen property, the illicit nature of each object would have to be proved before a grand jury. 'Essentially, you've got 180 crimes,' Bogdanos said. 'So, you have 180 mini-trials.' Hearsay isn't allowed as evidence in New York, so witnesses from around the world would have to be flown in to testify, which was virtually impossible with pandemic restrictions. At the same time, Steinhardt's lawyers were pushing for a settlement, arguing that he'd been misled by dealers and citing, among other reasons, his "philanthropic status" to avoid trial.

"In December 2021, the DA's office announced that an agreement had been reached. Steinhardt would not be prosecuted for any crimes as long as he immediately surrendered the 180 stolen objects for repatriation. He also agreed to a lifetime ban on collecting, the first of its kind ever handed down in the world of antiquities. He would, however, be allowed."

The solution, then, may have been pragmatic for both sides, but it proved nothing in law despite almost all the ensuing headlines saying otherwise.

### **Ancient coin collecting is at risk**

Deseret News: February 18: A well-argued opinion piece on the damage that bilateral agreements are inflicting on legitimate interests, such as coin collecting.

“Unfortunately, our ability to purchase ancient Roman coins from around the world is at risk due to ever increasing numbers of import restrictions that are being implemented through memorandums of understanding between the Department of State’s Bureau of Education and Cultural Affairs and foreign governments,” writes Any Pierucci of the Ancient Coin Collectors Guild.

The problem is that the State department has ventured way beyond the intentions of Congress when it introduced “narrowly tailored” import restrictions to tackle illegally exported items, he points out. The result is the seizure and repatriation of all sorts of cultural goods that have been imported into the United States legally.

It’s an injustice that IADAA has been airing in these newsletters for many months.

Pierucci argues that this heavy-handed approach to policing collecting goes against US policy: “It is ironic that the Bureau of Education and Cultural Affairs, whose mission is “to increase mutual understanding between the people of the United States and the people of other countries by means of educational and cultural exchange ...” would consider impeding the ability of Americans to engage in a hobby that enhances cultural understanding.”

### **New York antiquities trafficking unit focuses on US patron of Israeli archaeology**

The Times of Israel: February 18: The Manhattan Assistant District Attorney, Matthew Bogdanos, has now turned his attention to philanthropist Shelby White, a woman well known for donating to museums in New York and Israel.

So far, all that has been announced is that White has handed over two dozen pieces valued at around \$20 million, some of which have been returned to Italy and Turkey. No details have been released on the circumstances of this handover, but after everything that has come before, it appears that evidence of wrongdoing is no longer a pre-requisite for what amounts to seizure. As this article explains: “Bogdanos has upended the market for archaeological artifacts. Using a previously obscure New York law, he convinced the courts to regard the possession of stolen antiquities as potentially criminal, even if a collector had legally purchased the looted item in question.

“Since many of the antiquities that have entered the United States are believed to have been looted at one point in time, this legal precedent has jeopardized the status of many if not all major collections held in museums and by private individuals.”

In essence then, it appears the mere suspicion – without any evidence to show this – that an item might once, perhaps centuries ago, have been stolen, is proving sufficient leverage for Bogdanos and his colleagues to frighten collectors and museums into handing them over.

### **What does the future hold for the Antiquities trade?**

Apollo: February 27: An exceptional article on the challenges facing the trade and its attitude to those challenges. The author, Jane Morris, is a former Editor of the Art Newspaper and remains its Editor-at-Large, as well as being a well-known columnist for other leading titles. Here she illustrates why a firm grasp of the issues is essential for handling the topic in an authoritative and responsible manner – a grasp so lacking among most journalists.

In what amounts to a preview of TEFAF Maastricht, Morris interviews leading London dealers Charis Tyndall, Costas Paraskevaides and Salomon Aaron, as well as Paris dealer Ollivier Chenel – all of them IADAA members – about their businesses and operating in the market.

Central to their concerns is the importance of provenance, due diligence and reputation, all of which are treated with the greatest of care, in contrast to what might have happened decades ago. “It wasn’t that people were deliberately doing something wrong, it is just that there wasn’t

the same level of awareness of the potential problems as there is now,” Tyndall explains.

“Provenance is the number one issue in our field,” adds Paraskevaides. “All of us do so much research and most dealers now are extremely careful. I’m in my late thirties, so I could still be dealing in 30 years: I don’t want a problem [to come back to haunt me] in the future.”

It's a very important point. Many anti-trade campaigners assume that dealers deliberately set out to break the law. Why would they when it is asking for trouble and so damaging to reputations? What is to be gained when it is perfectly possible to earn a living honestly? And why must dealers be considered dishonest by default?

What dealers like Aaron, Chenel and the others want to focus on is the quality and artistic nature of the items they handle.

Morris does not duck the issue where problems have arisen, noting the recent Aboutaam case and the ongoing controversy over the Abu Dhabi Louvre, but she also keeps a grip on the reins when it comes to claims and statistics: “No one knows how big a problem this illicit trade might be, despite an often repeated but unsubstantiated claim by Unesco that it could be \$10bn a year. In 2020, [a report](#) by the US think tank the Rand Corporation argued that the ‘market for all antiquities, both licit and illicit is [...] at most, a few hundred million dollars annually’.”

Reinforcing this is input from Fionnuala Rogers, founder of Canvas Art Law and the chair of the Blue Shield in the UK: “It’s impossible to quantify the problem because there is a lack of reliable data. But in the UK investigators see illicit objects all too regularly... But the problem is not, in general, in the established art trade. There is a network of private dealers, individuals and groups, many of whom do not reside in the UK, who sell to uneducated collectors.”

### **Money Laundering and Terrorist Financing in the Art and Antiquities Market**

Financial Action Task Force: February 2023: The nature of operations with the FATF means that almost all the information it talks about is heavily redacted, as here, making it very difficult to test the validity of its propositions.

Three things immediately ring alarm bells here, though:

- The introductory video promoting the report gives the impression that the art market is rife with people laundering money and funding terrorism (the report itself does not support this).
- The reaction to this promotion on social media, which confirms the fears raised by the first alarm bell – mostly they demonstrate how it is simply reinforcing prejudice.
- The most important initial independent statistic the report quotes as it launches into its arguments is wrong, as IADAA has demonstrated on numerous occasions. In paragraph 3 of the Introduction Background on page 5, it notes that the United Nations Office on Drugs and Crime (UNODC) “has estimated that in 2011, as much as USD 6.3 billion in illicit proceeds could have been laundered through or associated with the trade in cultural objects”. In fact, the figure, which was sourced from House of Commons Select Committee evidence in 2000 – now almost a quarter of a century ago – does nothing of the sort as [CINOA’s Bogus Statistics report](#) proves. FATF has simply taken UNODC’s word for it, thereby adding to the dissemination of fake news. This being the case, how reliable is the rest of the report?

Buried in the report is the following: “The markets for art, antiquities and other cultural objects are diverse in size, business models and geographic reach. Most are relatively small, and the vast majority of participants have no connection to illicit activity.” Why is this finding not more prominent?

IADAA will publish a more detailed analysis in next month’s newsletter. However, one point that is clear right now: as a global force the FATF should be better at handling such serious and sensitive subjects. With the ability to wield such influence comes an equal responsibility to ensure that it pays sufficient attention to the impression it creates through its marketing materials. This is a very poor start, and it should immediately conduct an investigation into its methods.





FATF

and includes indicators of possible cases of money laundering and terrorist financing in the art and antiquities market

Case No.	Date	Location	Value	User ID	Cryptocurrency Address	First episode	Status
1	12-11-2019	PL, Canada	1921	08000000	7800042-16aa-4716-6183-86c48a412004	1198,441.14 USD	Pending
2	10-30-2019	ML, E.S.	1638	08000000	432a2a7b-6258-425c-3419-0b1710203243	47,178.31 USD	Approved
3	10-17-2020	ML, Canada	2038	08000000	ae0806d3-7723-4a83-bc09-77e485161339	47,108.94 USD	Approved
4	02-04-2020	ML, E.S.	1639	07200000	8a2b7261-71ed-080a-b66d-6a0000003729	411,160.28 CAD	Approved
5	09-16-2020	ML, U.S.A.	1937	08000000	60523ab7-4a4b-43ad-8946-3044a3312069	8116,060.03 MXN	Approved
6	11-24-2019	ML, U.S.A.	1941	08000000	632d1500-2116-4334-8276-080c3a080004	71,810.45 EUR	Pending
7	09-30-2020	ML, E.S.	2021	08000000	090e2a2c-ae13-4644-8a3a-06c7e1680016	47,463.77 CAD	Approved
8	10-06-2020	ML, U.S.A.	2017	08000000	af0e4a0e-42aa-4381-873a-0a07f0a4130a	403,376.48 USD	Approved
9	03-20-2019	ML, Canada	1929	08000000	50813201-4e18-4300-0121-1e1819400000	412,479.24 USD	Pending
10	04-28-2019	ML, Latin America	1910	08000000	6711e058-1139-420c-860c-8a0a0000770a3	61,666.27 USD	Approved
11	06-06-2019	ML, Asia	1915	08000000	62210001-0018-4a0a-910a-0a0000010200	471,282.87 USD	Pending
12	05-03-2019	ML, U.S.A.	1913	07200000	67714d0c-403a-430b-850c-0a0000000000	4710,153.14 USD	Approved
13	05-06-2019	ML, E.S.	1911	08000000	64360163-07aa-4a4d-8409-8c0400000000	111,204.24 USD	Pending
14	09-06-2019	ML, Canada	1940	08000000	8a0f13ee-07af-4012-0a07-0a0101000000	4036,300.00 USD	Pending
15	11-13-2019	ML, U.S.A.	1933	08000000	7a592974-6aa1-48b7-82ad-07a400000000	4633,300.33 JPY	Approved
16	05-06-2019	ML, U.S.A.	1829	08000000	4a714032-0771-480a-097a-0a010000007f	482,200.01 USD	Approved
17	05-28-2020	ML, E.S.	1946	08000000	096c0043-2b4c-0a0a-0910-0a2b0a0a0000	463,664.40 USD	Approved
18	04-07-2020	ML, U.S.A.	1918	08000000	a3a0e34c-47ee-426d-8a4b-333a00000041	10,625.71 USD	Approved
19	04-01-2019	ML, Canada	1919	08000000	7040a244-8a0b-4a0a-800d-0a0000003a71	4006,406.42 JPY	Approved
20	04-14-2019	ML, Canada	1924	08000000	4a330075-430a-400a-0a0a-0a0000000000	4,432.47 USD	Pending
21	04-14-2019	ML, Canada	1924	08000000	4a330075-430a-400a-0a0a-0a0000000000	4,432.47 USD	Pending
22	04-14-2019	ML, Canada	1924	08000000	4a330075-430a-400a-0a0a-0a0000000000	4,432.47 USD	Pending
23	04-14-2019	ML, Canada	1924	08000000	4a330075-430a-400a-0a0a-0a0000000000	4,432.47 USD	Pending
24	04-14-2019	ML, Canada	1924	08000000	4a330075-430a-400a-0a0a-0a0000000000	4,432.47 USD	Pending
25	04-14-2019	ML, Canada	1924	08000000	4a330075-430a-400a-0a0a-0a0000000000	4,432.47 USD	Pending
26	04-14-2019	ML, Canada	1924	08000000	4a330075-430a-400a-0a0a-0a0000000000	4,432.47 USD	Pending
27	04-14-2019	ML, Canada	1924	08000000	4a330075-430a-400a-0a0a-0a0000000000	4,432.47 USD	Pending
28	04-14-2019	ML, Canada	1924	08000000	4a330075-430a-400a-0a0a-0a0000000000	4,432.47 USD	Pending
29	04-14-2019	ML, Canada	1924	08000000	4a330075-430a-400a-0a0a-0a0000000000	4,432.47 USD	Pending
30	04-14-2019	ML, Canada	1924	08000000	4a330075-430a-400a-0a0a-0a0000000000	4,432.47 USD	Pending
31	04-14-2019	ML, Canada	1924	08000000	4a330075-430a-400a-0a0a-0a0000000000	4,432.47 USD	Pending
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