



COUNTERING LOOTING OF ANTIQUITIES IN SYRIA AND IRAQ

Final Report

Research and Training on Illicit Markets for Iraqi and Syrian Art and Antiquities: Understanding networks and markets, and developing tools to interdict and prevent the trafficking of cultural property that could finance terrorism



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Executive Summary

The looting of antiquities has been a scourge throughout history, especially in times of war. But over the past decade there have been changes in technology – especially in excavation, transport and marketing via social media and the Internet--that have expanded and globalized the trade and made it easier for non-experts to reap the profits. This report looks at (1) the current state of the trade in looted antiquities from Iraq and Syria, (2) the role of new technologies that make it easier for terrorists and criminal groups to profit and (3) new ways to track terrorist involvement in the trade and try to disrupt it.

MAJOR FINDINGS

Traditionally, antiquities trafficking centered on low-volume trade of large, expensive objects, sold by experts to experts. But the current looting out of Syria and Iraq targets coins and smaller objects such as cuneiform-inscribed objects, jewelry glass, etc. – a shift enabled by the widespread availability of metal detectors, the Internet and cellular communications. Coins and other small objects can be easily concealed and transported out of Syria or Iraq, offered for sale on the Internet and delivered by mail or courier to international destinations. Some of these small items can be extremely valuable, and even when the artifacts are individually of modest value, the revenue accumulated can be substantial because technology has greatly expanded the size of the market. And neither the looting, nor the marketing requires much specialized knowledge.

There are two distinct sectors of the market where terrorist groups and individual jihadis are most likely to be reaping profits at present:

- (1) At the initial stage, where antiquities are being dug up from the ground in Syria and to a lesser extent, Iraq, by individuals, or small teams, with access to excavators and metal detectors, and are subject to “taxation” or “licensing” by whatever armed group controls the territory at the time.
- (2) As intermediaries, during the transport and early-stage marketing of the antiquities, profiting directly from sales.

Since all armed factions have been profiting from looting and smuggling, and their areas of territorial control have fluctuated through time, it is not possible to pick apart discrete flows of antiquities that are financing specific terrorist or other armed groups. Indeed, most of the supply networks for antiquities appear to be hybrid, with materials sourced and transported indiscriminately by criminal, jihadi and other armed groups, collaborating when necessary. From the moment they are dug out of the ground or stolen from a museum until the time they appear for sale in the United States, antiquities from many sources are mixed together on the gray market.

Monitoring the major Internet sales sites provides some insights into the scope of the market and its different components, but has not yet provided a clear window on any of these areas, mainly because trade in antiquities from the region is so extensive, and in most cases there is no reliable way to determine whether any specific object for sale was originally found in Syria, Iraq, or a



neighboring state. Unfortunately, it is not possible to isolate discrete, terrorist-financing flows of antiquities and take action against them.

A more promising approach, which this project has been working to develop, is to track the trade networks, starting with some of the major dealers in the United States, United Kingdom and Germany who are known to have sold looted antiquities in the past, and then tracing their contacts back through the supply chain using open social media. Preliminary research of this type has produced some interesting individual results, but needs to be pursued over a longer period, in greater depth, and with some tailored technology to produce verifiable results.

Crime control policy needs to be sensitive to the organization of the illegal trade it is intending to prevent. It is a matter of some urgency that the nature and organization of the post-2011 trade out of Syria should be properly characterized so that appropriate and effective countermeasures can be planned and implemented, focusing on eliminating trade (and terrorist financing) rather than simply recovering looted material.

The only sure routes to choking off terrorist funding are to use information derived from monitoring and tracking the trade to help law enforcement take vigorous action against criminal traders and their associates, so that they will not be ready and able to profit from antiquities trading in any present or future conflict, and to make antiquities collecting generally less culturally and financially rewarding, thereby reducing demand.

Appendices to this paper cover: (1) Internet monitoring findings & methodology (2) Trade routes (3) Policy recommendations (4) Training recommendations.



Countering Looting of Antiquities in Syria and Iraq

This report has been prepared as part of the US State Department funded project Countering Looting of Antiquities from Syria and Iraq (CLASI), conceived and delivered by the Terrorism, Transnational Crime and Corruption Center (TraCCC) of George Mason University. It is based on original open-source research conducted by the CLASI project, Internet and social media monitoring, as well as interviews with knowledgeable “project informants” (PIs) living inside Turkey, Syria and Iraq. It aims to present an overview of what is currently known about the illegal trade in Syrian and Iraqi antiquities and the trade’s links to terrorist financing.

INTRODUCTION

Antiquities looting by armed groups has a long history: Proceeds from antiquities trading have long been used to support terrorism and other forms of armed violence in conflict zones¹. In the early 1970s, Cambodian government and North Vietnamese troops engaged directly in the plunder and sale of Cambodian antiquities, joined in the late 1980s by the Khmer Rouge and other paramilitaries.² In 1990s Afghanistan, various militia groups were directly engaged in looting³, and by 1998 the authorities in at least one Taliban-controlled province were exacting a 20 per cent tax on all antiquities sales.⁴ There was also evidence that the purchase and sale of antiquities were being used to launder the proceeds of opium trading.⁵ In Iraq, during the aftermath of the 2003 Iraq War, insurgency groups were reportedly involved in antiquities trading⁶. Since the start of the conflict in Syria in March 2011, in one way or another, all combatant factions have tolerated or profited from antiquities trading. This report considers the situation in Iraq and Syria since the Iraqi occupation of Kuwait in August 1990, with a particular focus on Syria since March 2011.

Satellite imagery shows continued looting with some abatement since 2014: Analysis of high-resolution satellite imagery has allowed some good quantitative investigations of recent archaeological site looting in Iraq and Syria, providing information about chronological trends and the types of material targeted.

For Syria, in 2017, 450 out of a sample of 2,641 archaeological sites (17 per cent) showed evidence of pre-March 2011 looting, with 355 sites (13 per cent) showing evidence of post-March 2011 looting⁷. Of those 355 sites, 276 sites exhibited a minor amount of damage, 52 sites a moderate amount of damage, and 27 sites a severe amount of damage. There were looted sites in areas controlled by all combatant factions, including the Syrian army, with 50 per cent of looted sites in areas never occupied by Islamic State of Iraq and the Levant (ISIL), though some of the most severely looted sites were in areas that had been or were subject to ISIL control. The most severe looting had been of Bronze Age sites (sources of cuneiform inscribed objects, cylinder seals, statuary, bronze objects, and jewelry), and Roman and Late Roman (or Byzantine) sites (sources of mosaics, mortuary statuary, jewelry, glass, and coins). Evidence suggests that looting has abated in Syria since late 2014, except at the largest and most prominent sites.

For the north-western Iraqi provinces of Al Anbar and Nineveh, in 2017, 50 out of a sample of 825 archaeological sites (6 per cent) showed evidence of pre-March 2011 looting, with only 2 out of the 825 sites (0.24 per cent) showing evidence of post-March 2011 lootings.



For south Iraq, in February 2003, 189 out of a sample of 1,465 archaeological sites (13 per cent) showed evidence of looting⁹. By the summer of 2003, immediately after the Coalition spring invasion (Operation Iraqi Freedom), 604 sites showed evidence of looting (41 per cent), with 151 of those sites exhibiting looting damage over more than 20 per cent of their surfaces. By the summer of 2015, 334 sites showed evidence of post-2003 looting (23 per cent), with 33 sites exhibiting looting damage over more than 20 per cent of their surfaces. The most severe looting had been of Bronze Age sites, and Parthian and Sassanian period sites (coeval with the Roman and Late Roman sites of Syria and again sources of jewelry, glass and coins).

United States has import restrictions on looted antiquities from Iraq and Syria: The import into the United States of Iraqi antiquities unlawfully removed from Iraq on or after August 6, 1990 has been prohibited since the August 13, 1990 Iraqi Sanctions Regulations, enacted in implementation of United Nations Security Council Resolution (UNSCR) 661. These restrictions were reaffirmed as applied to illegally-removed antiquities by the 2004 Emergency Protection for Iraqi Cultural Antiquities Act, in response to UNSCR 1483. Import restrictions under the 1983 Convention on Cultural Property Implementation Act (CPIA) and pursuant to this legislation were implemented in April 2008.

The import into the United States of Syrian antiquities unlawfully removed from Syria on or after March 15, 2011 has been prohibited since August 15, 2016 under the CPIA and the 2016 Protect and Preserve International Cultural Property Act, enacted in implementation of UNSCR 2199.

In addition to these import restrictions, both Syria and Iraq have vested ownership of undiscovered antiquities in the State. Any antiquities unlawfully removed from these countries after the respective dates of their ownership laws are potentially stolen property and their import and trade are criminalized under the 18 U.S.C. §§ 2314-2315 National Stolen Property Act (NSPA). For Iraq, the 1936 Antiquities Law established State ownership of antiquities. For Syria, the 1963 Antiquities Law established State ownership of antiquities. However, the NSPA applies only to objects worth \$5,000 or more.

THE GRAY MARKET

A “gray” market in antiquities mixes legal and illegal goods: The antiquities trade comprises three stages or markets: source, transit and destination. Antiquities are stolen or looted in source countries (such as Syria and Iraq), smuggled out and transported through one or more transit countries (such as Turkey and Lebanon), before arriving for sale on the destination market. Destination market countries in Europe and the United States possess the cultural and commercial institutions necessary to support and validate antiquities collecting. The destination market is legal in that antiquities trading and collecting are not subject to any specific or targeted regulation, though it might still be illegal to trade in antiquities stolen from other countries or otherwise illegally imported. Antiquities circulating on the destination market may have arrived there by legal or illegal means, days, decades or even centuries ago. No matter how long they have been in circulation, antiquities are usually sold with only minimum indications of previous ownership history (provenance), so that it is difficult for a discriminating collector to separate stolen or otherwise illegal property from legitimate material. This mixing of black and white has caused the antiquities trade to be characterized as a “gray” trade, neither demonstrably legal nor



illegal¹⁰. Thus recently looted and smuggled antiquities (and fakes) can be “laundered” passing through the transit market for entry on to the destination market by invented accounts of provenance, the provision of legal export documents from transit countries, and falsified customs declarations. As the boundaries of ancient cultures often spread across the borders of several modern countries, it is usually difficult to pinpoint the country of origin for any one specific object, or to establish its date of export and determine whether the export was legal or illegal.

Provenances are invented to increase value and provide plausible deniability: Invented provenances are intended to reassure a good faith or naïve collector that an object is on the market legally. They also provide a bad faith collector with plausible deniability of incriminating knowledge and thus limit any potential criminal liability for handling looted or smuggled antiquities. It is difficult to prove criminal intent on the part of any possessor of one that is stolen.

In 2010, for example, the Oklahoma-based Hobby Lobby company negotiated the purchase of more than 5,000 Iraqi cuneiform objects from Israeli and Emirati dealers in the United Arab Emirates (UAE). One of the Israeli dealers supplied a written account of provenance stating that his father had legally acquired 5,313 of the objects in the 1960s from “local markets”, and that the objects had been moved to the United States for safe storage in the 1970s before being shipped to the UAE for the 2010 purchase¹¹. In July 2017, Hobby Lobby agreed to forfeit the material and it was returned to Iraq¹².

In 2015, California dealer Mohamad Yassin Alcharihi imported a Byzantine mosaic, alleged by the FBI to have been exported illegally from Syria, along with 83 other objects, mainly pottery. During a 2016 raid on Alcharihi’s premises, FBI agents discovered a notarized statement of provenance signed by a neighbor and dated March 5, 2016, regarding a “mosaic carpet”¹³. It stated that in 2009 the neighbor had sold Alcharihi a rolled “mosaic carpet” that had been in her family’s possession since the 1970s. The neighbor told the FBI that she had sold Alcharihi a carpet, but not a mosaic, and that Alcharihi had prepared the misleading statement she had subsequently signed.

A variety of techniques help to avoid customs detection: Shipments of goods entering the United States must be cleared by Customs and Border Protection (CBP)¹⁴. Importers must provide entry forms describing the contents of shipments for CBP inspection. Statements on these documents are required to be true and complete. Entry forms are not required for shipments valued at or below a certain monetary threshold (\$2,500 in 2018), which are eligible for “informal entry”. For informal entry, the contents of the shipment, the value of the contents, and the county of origin, must be listed on a shipping label. There are not enough CBP agents to physically inspect all inbound shipments, but they do inspect entry documents or shipping labels. Packages arriving in the United States through express mail or courier delivery services often use informal entry procedures but must include a customs declaration giving a full and accurate description of contents and an invoice or bill of sale with an accurate description of contents and value.

There are several methods used by antiquities smugglers for evading CBP inspections¹⁵. They include:



- False declaration of the value of a shipment (lower than market value).
- False declaration of the country of origin of a shipment (a transit rather than source country).
- Vague and misleading descriptions of a shipment's contents.
- Splitting a single large object into several smaller pieces for separate deliveries, allowing informal entry and later reassembly after receipt.
- Addressing a shipment to a third party, falsely stated to be the addressee or purchaser, for subsequent transfer to the actual purchaser.
- Failure to complete appropriate customs paperwork.
- Concealing antiquities in shipments of similar, legitimate commercial goods.
- Addressing shipments to several different addresses for receipt by a single purchaser.

Contents descriptions matching categories in Chapters 68-70 and 97 of the Harmonized Tariff Schedule (HTS) are often used to hide or disguise antiquities on entry documentation.

On May 23, 2003, for example, federal agents seized four FedEx packages arriving from the United Kingdom addressed to New York dealer Mousa Khouli¹⁶. The associated customs documents listed the country of origin as England and described the contents as “English glass bottles circa 1860 A.D.” The material was determined to be from Iraq, dating from the third century BC to the eighth century AD.

In August 2008, Immigration and Customs Enforcement (ICE) agents seized a limestone head of a Lamassu (winged bull) taken from the palace of Assyrian King Sargon II after it arrived at New York from the Dubai-based Hassan Fazeli Trading Company¹⁷. Customs documents listed Turkey rather than Iraq as the country of origin, and declared a monetary value of \$6,500. It was independently appraised to be worth \$1,200,000¹⁸. On March 16, 2015, the United States returned the object to Iraq.

On January 19, 2011, CBP agents in Memphis seized five FedEx packages despatched by a dealer in the UAE and addressed to Hobby Lobby as part of the purchase previously described¹⁹. Together they contained 223 cuneiform tablets and 300 clay bullae from Iraq. Three more FedEx packages had previously passed through Memphis and been received by Hobby Lobby. The seized packages were all described as “handmade clay tiles”, with Turkey and not Iraq listed as country of origin, with declared values in the hundreds instead of the thousands of dollars (to allow informal entry), and addressed to three different recipients.

In August 2015, when Alcharihi imported the mosaic and other objects previously described, they were described on the CBP entry form as 82 pieces of “Ornamental Art Oth. Material” (HTS 6913.90.500), valued at \$1,808, with the mosaic described as “Ceramic, Unglazed Tiles, Hub” (HTS 6907.10.000), valued at \$391²⁰. When interviewed, Alcharihi admitted paying \$12,000 for the material, and declaring a lower value to reduce customs duties.

“Piggybacking” gives evidence of the rise in looted antiquities imports to the United States:

The practice of including stolen or looted antiquities in shipments of ostensibly similar legitimate material has been termed “piggybacking”²¹. The practice must be more common than is occasionally revealed by customs seizures. That being the case, flows of smuggled material might inflate official trade statistics. For example, imports into the United States of declared



material in HTS 97, which includes works of art, coins, collectors' pieces and antiques, have shown a marked increase in recent years. From 2012 to 2013, the monetary value of declared imports of "collections and collectors' pieces of zoological, botanical, mineralogical, historical, archaeological, numismatic or other interest" (HTS 9705) increased by 35.2 per cent for Turkey, 626 per cent for Lebanon, 244 per cent for Syria, and 1,050 per cent for Iraq.²² Similar increases could be documented for other sub-categories of HTS 97. Between 1989 and 2002, 1.1 kg of antique gold coins were imported from Turkey. This weight increased to 26 kg between 2003 and 2010, and then to 51 kg between 2011 and July 2016.²³ In 2018, HTS 9705 was revised to require separate reporting of imported antiquities and ethnographic objects.

MAJOR ROUTES OUT OF IRAQ AND SYRIA

Lebanon as a route from areas under Syrian government control: Lebanon has been a long-time conduit for Syrian antiquities, particularly during the period 1976 to 2005 when it was under Syrian occupation. Antiquities trading was legal in Lebanon until 1988²⁴, and with the ancient cultural continuities between Syria and Lebanon, it is easy to create fictitious sales histories for Syrian antiquities dating back to an invented Lebanese purchase sometime prior to 1988. From Lebanon, material passes to Europe or North America by sea or by air.

The importance of Lebanon as a transit route diminished after the Syrian withdrawal in 2005, but it has not fallen into disuse. In one year, for example, 2013, there were several major seizures of material from Syria, including objects thought to be from Apamea and Palmyra, and a large quantity of fakes²⁵. Looking at the conflict geography of the area, the Syrian side of the Lebanese border has mainly been under the control of the Syrian government, particularly since the Hezbollah occupation starting in 2012. Thus it should be expected that since 2011 Lebanon has been the favoured route for material looted in areas subject to government control. Looters and dealers resident in areas of opposition control in Idlib Governorate confirm that since 2011 access to Lebanon has become more difficult²⁶.

Turkey remains a key transit route, despite tightened border controls after 2014: There are long-established smuggling connections between Turkey and Germany²⁷, with Turkish dealers in Munich receiving material from associated dealers in Istanbul and other Turkish cities.

Since 1990 and perhaps earlier, Turkey has probably been a transit route for Iraqi antiquities, passing through Kurdish areas of control on both sides of the border. Since at least 2010, the archaeological museum of Sulaymaniyah in the Kurdistan Regional Government (KRG) of Iraq has been purchasing cuneiform material from looters and smugglers, including objects from south Iraq²⁸. Either the museum is tapping into a long-standing "passing trade" from south Iraq north into Turkey, or it is creating demand itself.

After 2011, routes out of Syria through Turkey were strengthened by Syrian dealers relocating over the border. As Lebanon was closed down to opposition groups, Turkey became correspondingly more important, and most trade from areas controlled by ISIL and Jabhat al-Nusra (JAN) looks to have passed through Turkey.

Until 2015, the Turkish border was open to people and material moving in and out of Syria, possibly as deliberate Turkish policy to support opposition groups (including ISIL and other



Salafists) fighting inside Syria²⁹. Corrupt Turkish border guards and police are well reported³⁰. In 2015, Turkey started strengthening border controls and constructing a barrier in some places³¹. On the Syrian side, Kurdish People's Protection Units (YPG) closed their section of border after June 2015³². The stronger border controls were reported to have dampened smuggling out of opposition-controlled areas³³. The border situation since the 2018 Turkish invasion of Afrin is unclear, though it has probably increased opportunities for smuggling from Free Syrian Army (FSA)-controlled areas³⁴.

Overland routes from Turkey to Germany through the Balkans became available in the 1990s after the lapse of Soviet control and the emergence there of organized crime³⁵. In March 2015, police seized 9,000 ancient coins, dozens of Roman statues and what looked to be Sumerian relief from Iraq in the district of Shumen in north-east Bulgaria. The Roman statues were thought to be from Turkey or another Middle Eastern country³⁶. Three people were arrested, including a Turk with Bulgarian citizenship. Not everything has been moving overland out of Turkey. In 2015 the Byzantine mosaic purchased by Alcharihi arrived at Long Beach, California after having been shipped by sea from Iskenderun in Turkey³⁷.

Israel's 2012 customs law amendment cut off its role in the transit trade: Israel's Antiquities Law of 1978 took into State ownership all undiscovered antiquities, but allowed a legal market of registered dealers to trade in Israeli antiquities discovered before 1978 or antiquities imported from other countries. Israel became a major transit country for material passing out of Jordan and Iraq, to be exported from Israel with an Israeli export permit and seemingly legitimised for international circulation. Entry for material from Jordan has become progressively more difficult since the construction of the West Bank barrier and restrictions introduced in 2002 on the movement of antiquities from Palestine to Israel³⁸. Until 2012, Israeli dealers were able to import antiquities from Iraq, Syria and other Middle Eastern countries via the UAE and London. In 2012, Israel acted to stop this trade by amending its customs law so that going forward full documentation of an antiquity's trading history would be required for legal import³⁹. The Israel Antiquities Authority (IAA) reported in 2018 that since the 2012 customs law amendment almost no Iraqi objects have entered Israel⁴⁰. The introduction of a new computerized inventory system for registered dealers, reducing opportunities for "laundering" duplicate objects through imprecise inventory entries, is likely to diminish Israel's role as a transit country still further⁴¹.

Jordan's importance diminished after passage of the Israeli law: Through the 1990s into the early 2000s, Jordan was an important transit route for Iraqi (and Jordanian) antiquities passing into Israel or being flown out of Amman to London⁴². Its present importance is unknown, though has likely diminished because of steps taken by Israel to eliminate its own role as a transit route. Nevertheless, it was reported in 2013 that Syrian antiquities were being smuggled out of opposition controlled areas into Jordan, often with refugees, either for transshipment elsewhere, or for purchase by collectors in Amman⁴³.

Iranian route is poorly described: It is reported that material from Iraq passes over the border controlled by the KRG to Iran, though the route is not well-known⁴⁴. There is also evidence to suggest that material is passing from Syria and Turkey to Iran, with one reported seizure of



Syrian antiquities from Iranian and Turkish nationals in Turkey's Sanliurfa province in April 2018⁴⁵.

United Arab Emirates show the important role of free trade zones: Material from Iraq and neighboring countries has arrived in the United Kingdom and the United States from the UAE, including the cuneiform objects seized from Hobby Lobby and the Lamassu head stopped entering New York already described. Dubai and the UAE more generally maintain large free trade zones that facilitate the duty-free transshipment of material.

Thailand may be developing a role in the trade: Thailand does not have an established record of being a transit country for Middle Eastern antiquities, but there is evidence to suggest that it is assuming the role⁴⁶. In March 2016, two pieces of relief from a church in the Syrian Euphrates Valley were seized at Charles de Gaulle Airport in Paris. They were in transit from Lebanon to Thailand. French customs thought the intended final destination was probably in the United States⁴⁷. A recent Spanish investigation showed antiquities looted from ISIL-controlled areas in Libya passing through Jordan, Dubai and Thailand before arriving in Europe (and therefore made available for sale to collectors in the United States)⁴⁸.

CHANGING NATURE OF THE ANTIQUITIES TRADE

The nature of the antiquities trade has changed considerably since 1990 as developing technologies and political reconfigurations have provided profitable new opportunities for conducting business. It is not clear that policies and actions aimed at diminishing the trade have adapted accordingly.

1990–2003, Auction houses and dealers rule the trade: During the 1990s, antiquities were sold mainly by auction houses, particularly in the United States by the main New York auction houses Sotheby's and Christie's, and by specialized antiquities dealers. It was common then to find large quantities of unprovenanced cylinder seals and cuneiform objects offered for sale at auction, most likely from Iraq, as well as occasionally some larger identifiably Iraqi though previously unknown antiquities. Although it was never proven, it was widely suspected that many of these objects had been recently smuggled out of Iraq (despite many catalogues carrying cautionary notices about trade sanctions introduced by UNSCR 661)⁴⁹.

Auctions comprised the public face of the destination market, but at the same time there was a thriving private or invisible trade, with dealers selling directly to collectors. It was during this time that some large private collections of cuneiform objects were assembled. Again, these objects were generally unprovenanced and suspected of having been recently looted in Iraq, though it was never proven⁵⁰. ICE ended an investigation into a donation of 1,679 tablets to Cornell University, for example, because it could not establish the date of export from Iraq⁵¹.

2003–2011, Internet sales begin: In December 2008, at the request of the FBI, Christie's New York withdrew a pair of gold earrings from auction⁵². The earrings were part of the "Nimrud" treasure, a collection of Neo-Assyrian gold and jewelry discovered in 1989 and stolen sometime afterwards. They were returned to Iraq in 2010. But that case was unusual. After the looting of the Iraq National Museum in April 2003 and the adoption of UNSCR 1483 on May 22, 2003, auction house sales of unprovenanced Iraqi antiquities dropped away almost to nothing. When



auction sales of cylinder seals resumed in the late 2000s, they were offered in smaller numbers than had been the case before 2003, and usually described as having been out of their country of origin since before 1990 (the year UNSCR 661 was adopted)⁵³. Nevertheless, it was still common to see in auction catalogs antiquities such as Roman mosaics described as Syrian. Private sales of cuneiform objects continued, as exemplified by the Hobby Lobby purchase.

But during the early 2000s the nature of the antiquities trade was changing, partly because of political detente and trade deregulation at the end of the Cold War, but mainly because of the increasing availability of new technologies, particularly metal detectors and the Internet. By 2003, there was a maturing Internet antiquities market, with on-line dealers and auction houses selling direct to the public. Quantities of suspicious cylinder seals and cuneiform objects most likely from Iraq were being offered for sale, with sources described as Mesopotamia, Israel, or Syria⁵⁴. The Internet offered easy market access for a much larger number of customers than had previously been the case, and antiquities sold on the Internet were generally of poorer quality, and thus less valuable, than those that had been traditionally traded. With more people buying more material, particularly material that in the past would not have been considered worth trading, the expanding Internet market increased the volume of antiquities being looted and smuggled.

2011–2018, New technologies expand the market further: Since the 2011 onset of fighting in Syria, despite the well-documented damage caused to archaeological sites by looting, there have been hardly any reports of large Syrian antiquities appearing on the destination market in Europe or North America. There are three possible explanations for this seeming absence of post-2011 looted material: (1) it is being traded privately, perhaps on the Darknet, and not yet come to public attention; (2) it is being traded to destinations in the Gulf or further afield; or (3) it is being stockpiled for private sale in the future when limitation periods have expired and international attention has drifted elsewhere. But another reason for the seeming non-appearance of looted objects might be that the types of object being traded have changed, with coins and other small objects suitable for sale on the Internet becoming more commercially dominant. Larger and more expensive objects such as mosaics and statues are more difficult to transport, more readily recognizable, and thus less in demand.

During the 2010s, the Internet market continued to grow in size, while more developing technologies, particularly cellular smart phones, and their associated digital communication and social media apps, further refashioned the trade. Original research conducted for this project has shown that many dealers now possess a Facebook page, which might be used to advertise material for sale, arrange deals, and maintain contact with suppliers and customers⁵⁵. Disturbingly, some Facebook pages show dealers in contact with archaeologists, archaeological site workers, metal detecting enthusiasts and local law enforcement officials in Middle Eastern countries, all possible sources of information and material. The Facebook pages of some of these individuals show images of uncleaned coins, cylinder seals, pots, statues and other antiquities. Some appear to glorify Saddam Hussein, or show images of kidnappings, violent killings, and weapons, along with approving discussions of key political murders. There is little evidence of antiquities for sale on Arabic-language and Kurdish-language retail websites, though again, social media is in use. On Facebook and Twitter, sometimes it is possible to see purchasing



negotiations commence, but then not proceed, presumably continuing to a successful conclusion away from the site. Instagram is another popular social media venue for transacting material. One site appears to be based in Aleppo in Syria. Visitors engage with the owner openly, negotiating prices and shipping methods, though again actual deals seem to be made away from the site. Facebook and Instagram are also used by antiquities dealers in Turkey, and English-language YouTube and Instagram sites occasionally advertise material. It is noticeable that discussions of antiquities on social media sites are often in a non-European language, which usually in the Middle East is Arabic or Turkish. It is possible to hypothesize a schematic trading hierarchy, whereby social media is being used by dealers close to source to arrange ongoing trade and transport, while English-language dealer and auction websites present the retail face of the trade, offering material for sale to customers in Europe and North America.

Social media sites such as Facebook and Instagram need to be publicly accessible if they are to attract customers. When secrecy is required, WhatsApp or other means of electronic messaging are used to arrange deals⁵⁶. On May 16, 2015, US Special Forces raided the Syrian compound of Abu Sayyaf, head of the ISIL Diwan al Rikaz (Ministry of Natural Resources and Minerals, including its Antiquities Division), where they discovered images of stolen antiquities in the WhatsApp folder of his cell phone⁵⁷. Vetted membership Internet discussion forums are also used for establishing contact between buyers and sellers.

This project found no evidence of antiquities being traded on the Darknet. There are several possible explanations for this seeming absence of material on the Darknet, besides the obvious one that is very effectively hidden. Since the antiquities trade is a gray trade, as described earlier, rather than an overtly illegal one, sellers can access broad market demand on the open Internet, making the harder-to-find Darknet a less desirable platform for sales. In addition, easily accessible messaging apps, such as WhatsApp, that are encrypted and provide privacy, can reach a much wider audience than the Darknet, without appearing overtly illegal and deterring potential customers.

Inside Syria, the widespread use of metal detectors to search for coins and other metal objects has been documented⁵⁸. It is thought that the looting of the Hellenistic–Roman site of Dura Europos in Deir ez-Zor Governorate, badly looted by April 2014, might have been driven by the search for coins and jewelry⁵⁹. More than 300 people were reported digging there in early 2014, using metal detectors, and selling their finds to dealers at the site (some of them at least arriving from neighboring countries)⁶⁰. Dealers were also selling metal detectors to aspiring looters⁶¹. At the time, Deir ez-Zor was being contested between different opposition groups, including the FSA, JAN and ISIL. By February 2015, when it was firmly under the control of ISIL, looting was ongoing⁶².

Media reports from the border area of southern Turkey emphasize the trafficking of coins, jewelry and other small objects⁶³. Many of the antiquities recovered from the possession of Abu Sayyaf were coins from Syria and Iraq, together with electronic images of gold coins and jewelry on his computer⁶⁴. Most of the coins were perhaps early Islamic, though the presence of forgeries cannot be discounted⁶⁵. The importance of coins is also reflected in reports of seizures. Between 2011 and the end of 2015, Turkish authorities seized 6,800 objects of possibly Syrian origin, the



majority of them coins⁶⁶. By 2018, the number would be much higher. In May 2017, Turkish police at GAP Airport in Sanliurfa province seized 90 Hellenistic and Roman coins smuggled out of Syria⁶⁷. The Syrian suspect stated that he had bought the coins from a local smuggler with contacts with ISIL. In June 2017, two people were arrested in Aksaray province of Turkey, with 3,745 Byzantine coins and 408 other antiquities from Syria in their possession, bought from a Syrian smuggler in Hatay province⁶⁸. In May 2018, Bulgarian customs intercepted a car carrying 11,037 coins and 141 other antiquities entering the country from Turkey. The coins may have originated in Turkey, Iraq or Syria⁶⁹.

Thus it is likely that looting and smuggling from Syria post-2011 has preferentially targeted coins and smaller, lower-value objects, a shift enabled by the widespread availability of the Internet and cellular communication technologies, and metal detectors. Perhaps on the ground there is an expectation of more valuable finds. The Abu Sayyaf documents, for example, contain reference to a find of gold objects that was valued within Syria at between \$120,000-200,000. If such large sums of money are changing hands inside Syria for found material, even if only occasionally, they would provide a powerful incentive for looters intent upon finding a valuable “treasure” to continue digging, even when the monetary value of objects actually found is comparatively disappointing. But even without buried treasure, the looting of large numbers of small, relatively low-value individual objects would still in aggregate generate appreciable profits for anybody involved. Coins and other small objects can be easily concealed and transported out of Syria before being offered for sale on the Internet and delivered by mail or courier to customers on the destination market.

ORGANISATION AND OPERATION OF THE ANTIQUITIES TRADE

Complex supply chains with multiple actors: Material passes from looters in source countries to collectors in destination countries through an often complex chain of dealers (middlemen or intermediaries) and smugglers (couriers or runners). The division of labour makes sense logistically as the roles require different skill-sets and commercial networks and can act to protect dealers from being caught in possession of stolen material. Sometimes a single person can embody both roles. Some of the trade is long distance, point-to-point, passing from one dealer in a transit country straight to another one active on the destination market. Other trade is down-the-line, transiting through the hands of several dealers or criminal groups before reaching the destination market. All means of transport are utilized, including automobiles, buses, cargo trucks, mail and courier services, personal luggage, and air and sea freight. Some smugglers are generalists, willing to carry a range of illegal commodities, including alongside antiquities consumer products, cigarettes, pharmaceuticals and narcotics⁷⁰. Other smugglers are specialized, particularly those who transport high-value goods such as weapons, not wanting to compromise an expensive safe route for lower-value material like antiquities⁷¹. Sometimes commodity smuggling is secondary to refugee transport⁷². Dealers and smugglers are generally in business to make money, are not politically motivated, and are willing to trade material from any source⁷³.

Hybrid networks, the crime-terror nexus: Terrorist groups are specialists in political violence. To obtain funding they must incorporate criminal expertise or co-opt or forge alliances with criminal groups. Organized crime provides access to specialized services (e.g. money laundering



and counterfeiting) and operational support (e.g. access to smuggling networks). Increasingly, as terrorists adopt criminal financing methods, and vice versa, hybrid organisations emerge – the so-called crime-terror nexus⁷⁴. Criminal groups have been reported in Turkey with Syrian and Turkish members of different political affiliations, including the Syrian government and former ISIL members⁷⁵. One loose network of dealers inside Turkey has approximately 130 members, including 11 Syrians, with several members affiliated with ISIL and JAN⁷⁶. Syrians in Hatay province active in antiquities trading are reported to have established front companies with Turkish bank accounts for transferring money abroad⁷⁷.

In both Syria and Iraq, conflict was associated with an increase in antiquities faking as criminals moved to maximise supply⁷⁸. In 2015, the Syrian Director-General for Antiquities and Museums estimated that approximately 80 per cent of objects being seized internally were fake, compared to about 30 per cent at the start of the conflict⁷⁹. Counterfeit antiquities were filtered into the genuine trade, increasing profitability for those involved.

All factions are looting and extorting protection money from the diggers: Terrorist or armed insurgency groups contesting control of territory and facing strong government opposition are likely raising money through criminal enterprise, including smuggling but also extortion backed by threat or persuasion. Early on in the Syria conflict, several reports suggested that FSA and later JAN members were digging and selling antiquities to trade for money to fund weapons' purchases⁸⁰.

Pseudo-state terrorist groups such as ISIL in control of occupied territory are concerned to achieve some semblance of civil legitimacy and order by maintaining provision of peacetime goods and services. To achieve this end, they will legalize or suppress criminal enterprise and raise money through taxation of legitimate economic activity. ISIL moved quickly to legitimise and control archaeological looting and trading through a permit system and to impose a 20 per cent "khums tax" on any proceeds⁸¹. To maximize tax revenue, it tried to ensure that sales were conducted within its jurisdiction⁸². Thus it allowed ingress for non-affiliated dealers or smugglers⁸³. In February 2016, a YPG unit seized ISIL documents including an official paper allowing safe passage for a Turkish dealer through ISIL held territory⁸⁴. Another tactic to secure revenue was for ISIL to buy objects itself at a 20 per cent (tax) discount and then arrange for ongoing sales⁸⁵. ISIL also taxed material passing through its territory from other areas⁸⁶.

The US raid on Abu Sayyaf's compound also seized documentary evidence of ISIL's antiquities operation, showing how it controlled the trade to extract maximum profit. As well as issuing permits to individuals to excavate sites, ISIL took action to prevent unauthorised excavation. One memorandum dated September 13, 2014, prohibited people from excavating archaeological sites without prior permission, and prohibited unauthorized ISIL members from giving permission. Anybody violating these prohibitions would be subject to a penalty according to Sharia law.

ISIL might also have been defrauding its subjects. The Abu Sayyaf raid recovered the transcript of a judgment resolving a dispute over the value and ownership of some gold antiquities⁸⁷. The antiquities had been dug up by a group of women, who claimed to have refused an offer of \$120,000-180,000 made by Syrian merchants from Idlib Governorate. After occupying the area,



ISIL subsequently offered \$70,000 (which, allowing for tax deducted in advance, would have been \$87,500), hoping to sell the material to a Turkish dealer for \$200,000 (thereby raising an extra \$100,000 at the finders' expense).

Elements of Syrian government forces became involved in general organized crime after Syria's 1976 occupation of Lebanon, which secured for them control of Lebanese roads and ports and provided opportunities for extracting bribes and illegal taxes on smuggling and other illegal enterprises⁸⁸. Reports of their facilitation of or active involvement in antiquities looting and smuggling go back to the 1980s⁸⁹. Criminal elements might have profited directly by trading looted material, or at least been bribed to look away.

In 2012, the Syrian army or its Shabiha paramilitaries were reported to be engaged in looting at Palmyra⁹⁰, and the looting of Apamea was reported as proceeding with the knowledge and connivance of local Syrian army commanders⁹¹. By 2014, material from Palmyra was on sale in Lebanon and Turkey⁹². Palmyra was not occupied by ISIL until May 21, 2015. But reports of Syrian army involvement do not prove direct government organization or control of looting and trade, and do not indicate that the Syrian government has been profiting in any way from the proceeds of trade. Between 2012 and May 2015, Syrian government authorities recovered 125 Palmyran antiquities, mainly inside Syria⁹³, demonstrating official government intolerance of looting and smuggling (unless it is viewed more cynically as a performance of intolerance for domestic and international public consumption). Staff of the Directorate-General of Antiquities and Museums (DGAM), Syria's government organisation tasked with protecting archaeological sites and museums, have struggled in difficult circumstances throughout the country to fulfil their duties⁹⁴. Reports of Syrian army involvement probably reflect the actions of locally corrupt or criminal commanders, with any proceeds benefiting them personally, and do not necessarily implicate the Syrian government. Nevertheless, for a looter or smuggler, it is a fine line between a tax paid to ISIL and a bribe paid to a corrupt army officer.

As ISIL has been pushed back, incoming groups have continued to profit from antiquities trading. Smugglers who in the past paid tax to ISIL now pay bribes to government forces, or taxes to other opposition groups, including the FSA and JAN⁹⁵. It is becoming increasingly clear, if it was not clear already, that political boundaries are permeable and that criminal actors are changing allegiance when it is profitable, expedient, or necessary for them to do so⁹⁶.

The facts that all armed factions have been profiting from looting and smuggling, and that ISIL's territorial control has fluctuated through time, mean that it is not practical to pick apart discrete flows of antiquities that are financing terrorist and non-terrorist groups. By the time they are passing through the transit market, antiquities from different sources that have profited different groups will have become mixed together, fake and genuine, with trading histories suppressed and invented for passage onto the destination market.

Some of the transit trade is facilitated by ethnic and linguistic diasporas: Sometimes destination market dealing is a family business for ethnic minorities, passing down through more than one generation, but allowing continuing familial and commercial contacts with the dealer's county of origin. Many of the Turkish dealers in Germany and the United States belong to Syriac or Kurdish families from Mardin⁹⁷. The large-scale movement of Syrian refugees into Turkey



must be considered under this heading. Language and family relationships between Syrian nationals resident in Syria and Turkey have enabled trade both out of Syria and onwards to Europe⁹⁸. Similarly, Kurdish groups in Syria are reported to be working with Kurds in Turkey and Germany.⁹⁹

LONG-TERM POLICY FAILURE?

A long history of ignoring illegally-traded Syrian antiquities laid the groundwork for post-2011 looting: Satellite imagery confirms that archaeological sites in Syria were being looted before 2011. There was a healthy international trade in Syrian antiquities, with no serious or systematic attempts at disguising their origin. It was common to see Syria offered as country of origin in sales descriptions of objects that could have been found in Syria. Syria was even used in sales and customs descriptions to disguise the origin of material most likely from Iraq or another country. In 2001, for example, CBP agents at JFK international Airport reported the arrival from the United Kingdom of more than 100 Iraqi cylinder seals misdescribed as Syrian¹⁰⁰. On December 20, 2010, CBP agents at Detroit Metropolitan Airport stopped a Michigan-based dealer entering the United States from Jordan and seized Byzantine coins he was carrying. He claimed the coins were Syrian, but the coins were confiscated because he provided two different invoices at two different inspections – not because they were Syrian¹⁰¹. In February 2000, a New York dealer arrived at JFK International Airport with an Iranian silver vessel, which he misdeclared to customs as Syrian. He was allowed through, but arrested in December 2003 when it became known that the vessel was in fact from Iran, and its import had been illegal under the Iranian Transactions Regulations¹⁰².

There are also examples of Syrian objects that were in transit or on the market before 2011, but not seized until after 2011. In April 2014, an inscribed Syrian stele offered for sale at London's Bonhams auction house was seized by the Metropolitan Police when evidence came to light that it had probably been looted in 1999¹⁰³. It had been offered at Christie's New York in 2000 but had failed to sell. Sometime between 2013 and 2016, three funerary reliefs from Palmyra were seized in the Geneva Freeport. They had arrived there in 2009 and 2010 from Qatar¹⁰⁴. There were some seizures of Syrian material looted and smuggled before 2011. Between 1991 and 1996, for example, 86 pieces of Syrian Late Roman floor mosaic arrived in Montreal from Lebanon. Most were recovered and returned to Syria¹⁰⁵. Nevertheless, apart from the Montreal mosaics, the evidence suggests that before 2011 the trade in Syrian objects was considered unproblematical by customs and dealers alike.

Thus there was an open trade in Syrian antiquities in the decades leading up to 2011, but very little was done to stop it. Many of the people involved were still active in 2011, inside Syria, but also on the transit and destination markets. They constituted a vestigial yet experienced organisational structure that was available to encourage and support the rapid increase in looting and smuggling seen after 2011.

Widespread corruption ignored: Inside Turkey, Gaziantep has since 2011 emerged as a major hub of the cross-border trade, due in part to a well-established network of dealers and smugglers working with corrupt government officials and law enforcement officers¹⁰⁶. The corrupting influence of these long-established collaborations of wealthy and politically influential dealers



(and collectors) and smugglers has been reported in other countries in the region¹⁰⁷. Protected as they were, no successful attempts were made before 2011 to extirpate these networks, and they have continued in operation. It is questionable to what extent policy initiatives aimed at building professional capacity through the region will succeed unless they augmented by parallel initiatives aimed at rooting out corruption.

The nature of the trade changed after 2011, making it even harder to combat: The traditional low-volume trade of large, expensive objects presupposes the participation of a limited number of criminals, perhaps acting in long-term cooperation, exercising a good degree of control over the organization and operation of trade, and with significant transport and storage capabilities. It would be vulnerable to targeted law enforcement aiming to disrupt trade by apprehending offenders. The new higher-volume trade of smaller objects such as coins is harder to tackle. It is most likely dispersed, involving a larger number of people, and more loosely organized with less onerous transport and storage requirements. It will be flexible and opportunistic and better able to survive the occasional removal of participating criminals. Furthermore, the small amounts of money involved in individual transactions on the destination market will diminish the apparent seriousness of crimes and reduce the public interest requirement for committing adequate resources to their investigation and prosecution. That the NSPA applies only to objects worth more than \$5,000, for example, even though this may be considered in the aggregate for a shipment of antiquities, does form a disincentive to prosecutions involving low-value objects. Further, a key factor in determining the sentence that will be given to someone convicted of a property-related crime (which is what smuggling, etc. is) is the market value of the property involved. Because prosecutors may view the seriousness of a crime based on the type of sentence that can be achieved, this is another disincentive to prosecution for offences involving low-value objects. Thus both the case for and the effectiveness of targeted law enforcement is weakened.

Seize and send, an inappropriate crime control policy?: It is difficult to prove criminal intent on the part of dealers or collectors on the destination market. The gray trade facilitates honest or dishonest defences claiming innocent purchase. As a result, while most seized looted and smuggled antiquities are returned to their lawful owners, there is hardly ever an associated criminal investigation or conviction. This policy has been termed “seize and send”¹⁰⁸ or “recovery and return”¹⁰⁹. It can be justified by the argument that the return of an antiquity of great cultural worth to its dispossessed owner should not be jeopardised by the uncertain outcome of a criminal trial. But it is debateable to what extent the antiquities seized through customs and other law enforcement actions match such high cultural standards. Dealers and smugglers can accept the occasional loss of material through “seize and send” as a cost of doing business, and continue trading, thereby generating proceeds at source for terrorist groups to appropriate. Terrorist profiting from the looting and smuggling of antiquities out of Syria and Iraq will never be stopped while the dealers and smugglers responsible are left at large. It is a matter of some urgency that appropriate and effective countermeasures should be planned and implemented, focusing on eliminating trade (and thus terrorist financing) rather than recovering looted material.

FINANCIAL ASPECTS OF THE TRADE



Large mark-ups for material traded out of Iraq: In 2003, looters on the ground in Iraq were being paid about \$50 each for a cuneiform tablet or cylinder seal¹¹⁰. In Europe or North America, at the time, similar objects could command prices in the region of \$300-1,000 or more, a mark-up of several hundred per cent. This mark-up represented profit to be divided between the various dealers and smugglers that constitute the trade, and included payments through bribery, extortion or taxation necessary to allow its operation. As far as the antiquities trade generally is concerned, this magnitude of mark-up is normal, with most profit being made by dealers selling material to high worth collectors and museums on the destination market¹¹¹.

Surprisingly high prices are reported on the ground in Syria: The financial structure of the trade out of Syria since 2011 is not so clear cut. Prices reported on-the-ground by journalists and other sources seem very high when compared to what can be expected on the destination market. The table shows prices claimed by people inside Syria for coins of identifiable type, against prices for coins of a similar type being sold on the destination market¹¹².

<i>Inside Syria</i>		<i>Destination market</i>			
<i>Coin description</i>	<i>Reported price (\$)</i>	<i>Coin type</i>	<i>Median price (\$)</i>	<i>Lowest price (\$)</i>	<i>Highest price (\$)</i>
Silver coin with portrait of Nero	1500	Provincial Nero silver tetradrachm	275	100	1450
Late Roman and Byzantine gold coins	1500	Late Roman and Byzantine solidi minted in Antioch	588	220	4750
Silver Greek coin with image of Alexander	350/200	Syrian Alexander III tetradrachm	260	120	1750
Silver Greek coin with owl	400	Eastern Owl tetradrachm	308	72	1600

It was reported in 2015 that a Turkish dealer was in possession of a Syrian mosaic that had been smuggled across the border rolled up in a carpet. He said he had bought it for \$21,000 from a dealer in Syria and hoped to sell it for \$30,000¹¹³. At the same time, in 2015, in the case previously described, Alcharihi paid a dealer in Turkey \$12,000 for a large mosaic, two smaller mosaics and 81 pottery vessels. Once the mosaic had arrived in the United States, he paid a conservation company \$40,000 to restore it, and after restoration independent appraisals suggested it to be worth between \$70,000 and \$200,000. The Alcharihi mosaic demonstrated the large mark-up in price expected on the destination market, including the added-value of expert restoration. But the price paid in Turkey by Alcharihi of \$12,000 was significantly lower than the \$30,000 anticipated by the dealer in the report. The price in Syria would have been lower still.

Investigation of an image of a Hellenistic-Roman gold ring discovered on Abu Sayyaf's computer hard drive revealed it to be part of an assemblage of 18 pieces of gold jewelry, said to



have been sold in Deir ez-Zor Governorate for approximately \$260,000¹¹⁴. The ring, weighing 37 g, was subsequently smuggled into Turkey by a Syrian national, who is said to have sold it for \$250,000 in early 2015. He later sold the remaining pieces of the assemblage. In early 2016, Turkish police in Gaziantep confiscated the ring. This price of \$250,000 inside Turkey is difficult to reconcile with the prices of similar gold rings sold at auction in New York. In Ancient Jewelry sales, for example, held by Christie's New York in 2011 and 2012, prices for five similar rings were in the thousands to tens-of-thousands of dollars' range. The highest-priced ring sold for \$62,500¹¹⁵.

It is not certain how reliable these prices quoted inside Syria are. Dealers inside Syria and Turkey might be exaggerating prices for an expected sale, maybe as an opening gambit in a sales negotiation, or to bolster future prices. If dealers inside Turkey or other countries are monitoring prices on the destination market in sales catalogues or on the Internet, they might be discounting or unaware of the hidden costs of restoration or other services such as shipping and storage. Perhaps it is simply that currency conversions are misleading.

If the high prices reported for material inside Syria are correct, however, there are at least three possible explanations: (1) the new modalities of trade, low-value objects transacted directly through social media, messaging apps or the Internet, are driving down price differentials between source and destination markets, primarily by eliminating the profitable role of end-market dealer, and helped by better information obtained on-line about prices on destination market; (2) the practice instituted by ISIL but also perhaps by other groups of requiring dealers from Turkey to travel into Syria to acquire material might have increased prices on the ground; (3) at the other end of the trade, perhaps higher prices in emerging though under-reported destination markets in the Gulf, Russia and East Asia are trickling down to the source market.

Monetary value of the trade: Media reports that ISIL was making millions or even billions of dollars annually from the antiquities trade must be discounted¹¹⁶. There is no evidential support for such claims, and the figures stated are grossly out of proportion to what is known about the value of the antiquities trade more generally.

The documents seized during the Abu Sayyaf raid included a book of receipts, dated to between December 6, 2014, and March 26, 2015, recording \$265,000 tax revenue made from antiquities sales. Extrapolating, it would suggest that ISIL was making \$795,000 annually. Only three of the receipts were published, and it has since been implied that some of the money might have been raised through sale of gold or other precious metals¹¹⁷, which has caused lobbyists for the antiquities trade to question the \$265,000 figure¹¹⁸. More receipts have been published since then, however, with the English translations consistently reporting "relics" or "antiquities"¹¹⁹. As previously described, the Abu Sayyaf documents also contain reference to a find of gold objects that was valued within Syria at between \$120,000-180,000, with ISIL hoping to expropriate the material for below-value compensation and sell on, making \$117,500 in the process.

Low-value objects add up as market expands: Some individual coins can be sold on the destination market for prices in the tens-of-thousands of dollars' range, with some achieving prices in excess of \$100,000. But most low-denomination and common coins sell for considerably less. As relatively low-value objects, these coins are easily discounted as major



income generators. But coins are traded in large quantities and aggregate revenue might be substantial, as some hypothetical accounting can easily show. In June 2018, for example, one coin dealer in North America was offering for sale 63 Greek coins from “Syria and Phoenicia”, with a low price of \$115, a high price of \$6,000, a mean price of \$571, and a total value of \$39,994. If it is assumed that these coins had been sold in Syria for 10 per cent of their destination market value, in other words \$3,999, and further assumed that ISIL levied a 20 per cent tax, then the coins would have provided tax revenue of \$800. This calculation is not to suggest that the coins actually were traded from ISIL-held territory, it simply aims to assess their potential financial worth to a terrorist group. Hypothesizing further, it is informative to look at the 14,872 coins recovered in the three Turkish seizures of 2017 and 2018 referenced previously. Again, assuming each coin was found in ISIL-held territory, with a destination market price of \$571 and a price inside Syria of \$5, then inside Syria the coins would have generated \$74,360, which would have provided \$14,872 of tax revenue for ISIL. That is a significant sum of money and certainly a worthwhile one for ISIL to collect. Even with a lower average destination market price of \$100 and inside Syria a price of \$1 each, ISIL would have collected \$2,974. If prices inside Syria were higher, as reports suggest, the revenue for ISIL would likewise have been higher.

It is not possible from the evidence currently available to offer an accurate assessment of the financial worth of the antiquities trade to ISIL, but from what is known, an annual income in the hundreds-of-thousands and perhaps high hundreds-of-thousands of dollars’ range is not an outlandish estimate – perhaps one or two million dollars total¹²⁰. The trade was certainly profitable enough for ISIL to exert command and control.

CONCLUSION: TERRORIST FINANCING, ANTIQUITIES AND THE INTERNET

Where on the supply chain do terrorists make their money?: It is well known that antiquities trading finances terrorism and other forms of armed violence. Investigating how antiquities trading finances terrorism, this project has shown that most terrorist involvement comes at the earlier stages of the supply chain, on the source market during the initial looting and transport of antiquities out of Syria and Iraq. With the possible exception of Hezbollah, which territorially is well-established in Lebanon and since 2012 has developed a significant cross-border presence in Syria, none of the other groups appears to have controlled territory for long enough to have nurtured the specialized criminal and commercial networks necessary to move material from the source market to the highly-profitable destination market, for final sale to collectors and museums. They have instead relied upon the services of already established or newly-formed criminal trading networks.

There are two distinct sectors of the source market where terrorist groups and individual jihadis are most likely to be reaping profits at present:

1. At the initial stage, where antiquities are being dug up from the ground in Syria and to a lesser extent, Iraq, by individuals, or small teams with access to excavator machines and metal detectors. The leaders of these small teams, whatever their political sympathies, still appear to pay “taxes” or protection money to whatever armed group controls the



territory at the time, for the right to dig or the right to move antiquities out of the area and/or across the border, or both.

2. As intermediaries, during the transport and early-stage marketing of the antiquities. As documented in Turkey, they are most likely working in hybrid groups with smugglers and other criminal intermediaries, exploiting their contacts for transport, facilitating border crossings, sales, and/or producing some of the forgeries that have become a big component of the trade.

There is no evidence of antiquities being sold in large numbers on the Darknet. Nor has there been any evidence so far to substantiate the theory of large numbers of high-value antiquities being held in storage for future sale. However, if such antiquities are being held in storage or sold discretely to private collectors on the destination market, we might well not know about it. The 2011 Hobby Lobby seizures of material bought in 2010, for example, were only made public in 2017. The existence of newly-established markets in the Gulf area or further afield and their effect on the trade remain to be investigated. The best way to track this private trade would be by carefully monitoring acquisitions by private collections and museums, especially by new museums specializing in Islamic art and/or biblical themes.

Monitoring the major Internet sales sites provides some insights into the scope of the market and its different components, but has not yet provided a window on any of these areas, mainly because trade in antiquities from the region is so extensive, and in most cases there is no reliable way to determine whether any specific object for sale was originally found in Syria, Iraq, or a neighboring state. Unfortunately, it is not possible to isolate individual, terrorist-financing flows of antiquities and take action against them. From the moment they are dug out of the ground or stolen from a museum until the time they appear for sale in the United States, antiquities from many sources are mixed together in the undifferentiated churn of the gray market.

A more promising approach, which this project has been working to develop, is to track the trade networks, starting with some of the major dealers in the United States, United Kingdom and Germany who are known to have sold looted antiquities in the past, and then tracing their contacts back through the supply chain using open social media. Preliminary research of this type has produced some interesting individual results, but needs to be pursued over a longer period, in greater depth, and with some tailored technology to produce verifiable results. The only sure routes to choking off terrorist funding are to use information derived from monitoring and tracking the trade to help law enforcement take vigorous action against criminal traders and their associates, so that they will not be ready and able to profit from antiquities trading in any present or future conflict, and to make antiquities collecting generally less culturally and financially rewarding, thereby reducing demand.



Internet Sales Monitoring

MAIN POINTS

- If we want to trace the terrorist links to antiquities looting in specific cases, social media tracking is a more promising approach than monitoring sales sites, because:
 - Terrorist involvement is more likely to be present in the early stages of the supply chain than in the final sale.
 - Sales platforms provide little information on the identity of the seller or the provenance of the artifact.
 - In many cases, once sellers and buyers connect, the actual sale goes through social media and private person-to-person messaging apps, rather than through the sales site.
- We found no evidence of looted antiquities being sold on the dark net.

As discussed in the paper, the antiquities market has been characterized as a “gray” market where legally -acquired and looted materials are traded side-by-side. Often it can be difficult or even impossible, for legitimate buyers to determine the difference. This difficulty has been compounded by the rise of internet sales platforms and other social media, because the volume of sales and number of marketplaces have exploded. Whereas antiquities buyers used to have the opportunity to physically inspect the merchandise in auction houses and meet with dealers face to face, the vast majority of these transactions now take place at a distance, where the ultimate buyer has little knowledge of the seller’s identity and the provenance of the artifact.

Counterfeits and forgeries are also widespread in this market. From an archeologist’s perspective, this may be of less concern, in the sense that counterfeits are less destructive to cultural heritage, but it is a problem when it comes to terror finance, since fakes are often trafficked by criminal groups, possibly with terrorist links. Another complicating factor is in the nature of the market, and the fact that many artifacts are sold and re-sold numerous times. So even if the most recent seller seems legitimate, earlier stages of the supply chain may be very problematic.

This multiplicity of transactions makes it difficult to accurately assess the size of the market for antiquities, since a single object will likely be advertised on a number of different sales platforms, and could be sold and re-sold repeatedly by different dealers and collectors. In many cases the actual sale will take place off-line from the sales platform, through private messaging. We started the project monitoring 45 internet, 8 dark net and 24 auction sites in seven languages. We rapidly recognized that there was a great deal of overlap among the sites, but at the same time there are other trafficking channels through social media that are harder to monitor.

For the purpose of this introductory study, we focused on the two most important categories in the market: coins and objects with cuneiform inscriptions (usually tablets, cones, bullae and cylinder seals.) Other items, such as jewelry, sculpture, amulets and glass are also being looted from the region and might warrant studies of their own.

Looking simply at the numbers, coins are by far the most common artifact from Syria/Iraq offered for sale on the internet. Coins dug up in present-day Syria, Iraq and Iran, from all major



historical periods can be found on the internet. If you search for “Syrian coins” you will find a flood of listings, although they were not necessarily dug up within the borders of modern-day Syria, since the borders of the ancient empires were not coterminous with those of the modern states of the region. “Iraqi” coins are not a major category, since Iraq is a modern name, but many of the coins listed as “Achaemenid,” “Babylonian,” “Abbasid,” “Byzantine,” “Sassanian,” or “Umayyad” could have been dug up in modern-day Syria, Iran, Turkey, or Iraq. Additionally, coins labeled “Greek” and “Roman” could also have originated in Iraq.

Most of the ancient coins that are listed as “Syrian” are sold without provenance information, and prices do not appear to reflect any difference between those with or without provenance information, which can be vague, or inaccurate, in any case. Buyers appear to be concerned about authentication of the coins (i.e. whether they are authenticated by third parties as genuine Roman or Seleucid coins) but not when and how they were taken out of the ground. There is a wide variation in the prices being asked for similar objects.

Additionally, coins may be offered for sale individually or marketed as groups. The latter are typically mixtures of uncleaned or partially cleaned coins from various periods, which represent the fruits of looting with the aid of metal detectors; they sometimes also contain other metal objects. These may be described in the trade as hoards (usually misleadingly), dealer lots, wholesale lots, bulk lots, or metal detector finds, and are often sold with instructions and materials to clean the coins at home.

We followed the major vendors on the largest internet sales platforms for coins to develop a model that would give us baseline information on the sales of specific categories of coins, that would be replicable and could serve as a benchmark for future research and give us some specific revenue numbers to help ground the debate on the scope of the looted antiquities market, its role in threat finance, and the impact of any actions taken to address it. We also developed an accompanying list of mints and locally circulating coin types to add for more targeted monitoring results.

The top geographic locations offering coins for sale via online marketplaces were New York, Washington DC, and various other major cities in the United States and Europe (mostly Germany and the UK). Key dealers and auction houses were also detected in the UAE, Cyprus and Canada. While most coins had initial prices between the \$1-\$750 range, the highest priced item was listed for \$45,000.

The vast majority of artifacts bearing cuneiform writing are tablets, followed by cones, then cylinder seals. Top geographic locations offering artifacts bearing cuneiform writing for sale are New York, Los Angeles, London and Copenhagen. Galleries in LA, New York and Washington DC offered cuneiform artifacts at the highest price, with a median price of \$16,000 per item. The highest price item was on sale for \$40,000.

Overall, the trade in artifacts appears to be of a lower volume than originally thought. The more valuable items are usually advertised on-line for sale in the brick and mortar galleries, but many appear to have been sourced months or years in the past, which suggests a low turnover. Items advertised on social media or shopping platforms such as E-Bay are generally lower in value but



with a faster turnover and include a significant number of counterfeits. The subject matter experts on the CLASI team have determined that some galleries appear to carry only genuine artifacts while others offer a high proportion of fakes. The key figures involved in marketing directly to consumers in the USA and Europe appear to be well connected to individuals in the source countries.

Dark net monitoring: This project found no evidence of antiquities being traded on the dark net. There are several possible explanations for this seeming absence of material on the dark net, besides the obvious one that it is very effectively hidden. Since the antiquities trade is a gray trade, as described earlier, rather than an overtly illegal one, sellers can access broad market demand on the open Internet, making the dark net a less desirable platform for sales. In addition, easily accessible private messaging apps, such as WhatsApp, that are encrypted and provide privacy, can reach a much wider audience than the dark net, without appearing overtly illegal and deterring potential customers.

For our initial dark net monitoring we connected to the dark net via Tor and then mainly used the DuckDuckGo search engine to run queries. We also checked updated dark net market directories which have onion addresses of various popular markets, such as Dream Market, Silk Road 3, Tochka, WallStreet Market, AlphaBay, Crypto Market, Valhalla and Hansa. Our researchers made accounts on some of them to search for coins, cuneiform and other artifacts for sale. We also used dark net search tools such as Butler and webhose.io to conduct market searches of antiquities to no results. We gained temporary access to a program called OI Monitor, developed by Shadow Dragon, (<https://shadowdragon.io>). OI Monitor allows researchers to specify parameters to search the dark net and produces dark net results based on researcher queries. It does a more thorough job of monitoring the dark net than individual researchers can. The tool's dark net collection archives 90,000 TOR sites per day, but even with this program, over the course of several weeks, we did not find anything of interest on the dark net.

Social media monitoring: It has become clear from our research to date that social media tracking is a more promising approach than monitoring sales sites, if we want to trace the terrorist links to antiquities looting in specific cases. There are several reasons:

- (1) Terrorist involvement is more likely to be present in the early stages of the supply chain than in the final sale.
- (2) There is an enormous number of sales platforms, but they generally provide little information on the identity of the seller and their contacts, or the provenance of the artifacts.
- (3) In many cases, once sellers and buyers connect, the actual sale details go through social media and private person-to-person messaging apps (Facebook, Etsy, WhatsApp) rather than through the sale site.

Many individuals involved in the antiquities trade use their Facebook profiles as a marketing platform with hundreds or thousands of “friends” who are essentially business contacts both on the supply and the demand side. Building out these networks may make it possible to isolate the middlemen, who link the unscrupulous dealers in western countries to individuals in source countries directly involved in the looting and excavating, and thereby give us a picture of the



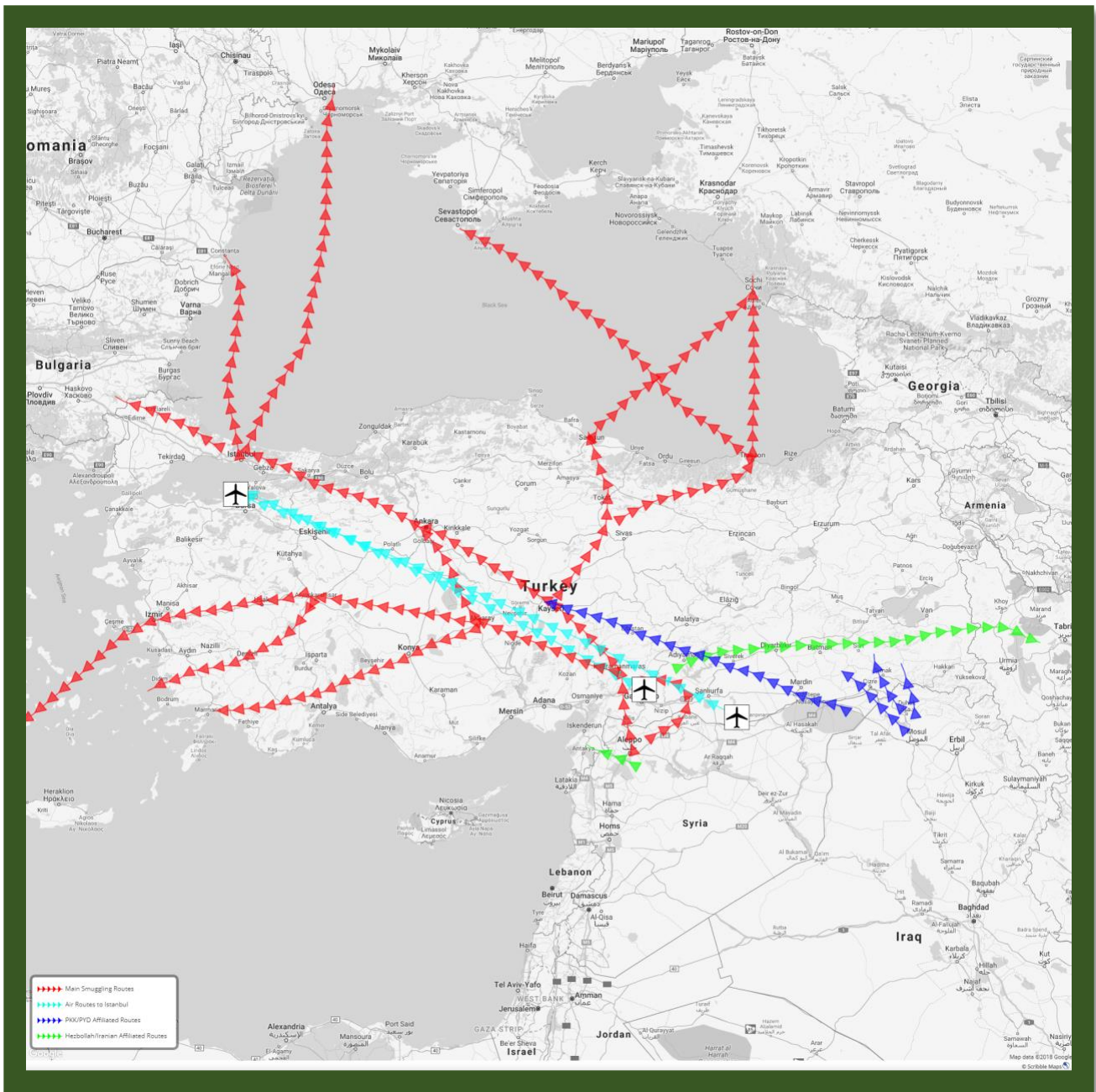
possible path from source to final destination. Preliminary research of this type has produced some interesting individual results, and we will be continuing it for the next few months, but it needs to be pursued over a longer period, in greater depth, and with some tailored technology to produce verifiable results that could be actionable by law enforcement.

ANTIQUITIES TRAFFICKING ROUTES





(DETAIL) ANTIQUITIES TRAFFICKING ROUTES THROUGH TURKEY





RECOMMENDATIONS FOR US GOVERNMENT ACTIONS TO COUNTER LOOTING OF ANTIQUITIES FROM SYRIA AND IRAQ

Summary

- Increase transparency and ease of tracking movement of art and antiquities
- Improve law enforcement effectiveness
- Improve legislative framework (HR 5886, HR 2285)
- Provide additional training and material support for specialized units fighting antiquities crime, and support closer collaboration with subject matter experts in archeology and numismatics

(1) Increase Transparency and Ease of Tracking Movement of Art and Antiquities

- Enact H.R. 5886 to require that dealers in art and antiquities be subject to the Bank Secrecy Act (with an amendment or clarification that “dealers” include “auction houses”). **This is particularly important because the European Union recently took this action so that could push the illegal market to the United States.**
- Efforts should be made to track possible funding from U.S. sources that may be used to warehouse antiquities in other countries, such as Turkey or the Gulf States.
- Sellers should be required to provide to buyers documentation of the provenance (or history of title) of artworks and antiquities at the time of sale.
- The Internal Revenue Service should require documentation of art works and antiquities that are donated to cultural institutions for a charitable deduction from income to support not only the value but also proof that the donor can convey title to the institution. To the extent that a donor cannot establish the ability to transfer title to a cultural organization through verified documentation, the amount of the deduction from income should be reduced proportionately.
- Amend the Protect and Preserve International Cultural Property Act to remove the sunset provision for restrictions on import of illegally removed cultural materials from Syria.

(2) Improve Law Enforcement Effectiveness

- Congress should enact legislation similar to H.R. 2285 (of the 114th Congress), the Prevent Trafficking in Cultural Property Act, which passed the House but was not taken up in the Senate. More specifically, the legislation provided:

The Commissioner of U.S. Customs and Border Protection and the Director of U.S. Immigration and Customs Enforcement shall—

(1) designate a principal coordinator within U.S. Customs and Border Protection and U.S. Immigration and Customs Enforcement, respectively, to direct, manage, coordinate, and



update their respective policies and procedures, as well as conduct interagency communications, regarding illegally imported cultural property;

(2) update existing directives, regulations, rules, and memoranda of understanding of U.S. Customs and Border Protection and U.S. Immigration and Customs Enforcement, respectively, and, if necessary, devise additional directives, regulations, rules, and memoranda of understanding, relating to policies and procedures on the illegal importation of cultural property in order to—

(A) reflect changes in cultural property law, including changes and updates to relevant treaties, bilateral agreements, statutes, regulations, and case law that occurred subsequent to Customs Directive No. 5230–015, “Customs Directive on Detention and Seizure of Cultural Property”, dated April 18, 1991;

(B) emphasize investigating, and providing support for investigations and prosecutions, of persons engaged in, conspiring to engage in, or facilitating the illegal importation of cultural property, including smugglers, dealers, buyers, money launderers, and any other appropriate parties; and

(C) provide for communication and coordination between relevant U.S. Customs and Border Protection and U.S. Immigration and Customs Enforcement offices, respectively, in investigating and supporting prosecutions of persons engaged in, conspiring to engage in, or facilitating the illegal importation of cultural property; and

(3) ensure relevant personnel within U.S. Customs and Border Protection and U.S. Immigration and Customs Enforcement, respectively, receive sufficient training in—

(A) relevant cultural property laws;

(B) the identification of cultural property that is at greatest risk of looting and trafficking; and

(C) methods of interdiction and investigative techniques specifically related to illegal trade in cultural property.

- Similar efforts should be carried out within the Department of Justice, including the F.B.I.’s Art Crime Team, for which greater resources should be allocated. These resources are needed to encourage undercover investigations in appropriate circumstances so as to reach higher-level market participants and to be able to establish criminal knowledge or intent on the part of participants.
- Refocus government efforts on criminal prosecutions against individuals who are engaged in criminal activity in order to effectively interdict the trade and dismantle networks. This may include undertaking undercover investigations including such techniques as controlled deliveries of illegal artifacts.
- Consolidation of expertise among Assistant U.S. Attorneys and Department of Homeland Security agents would provide greater effectiveness in policing the border and bringing



criminal prosecutions, as appropriate. Such consolidation could be achieved by restricting imports of cultural objects to certain designated ports and by establishing national jurisdiction in a specially trained team for prosecuting cultural property-related crimes.

- The United States should lead an effort for the World Trade Organization to update the Harmonized Tariff Schedule at the international level to add a new statistical breakout for archaeological pieces under Heading 9705, as the United States recently did and in compliance with UNSC Res 2347.
- Clarify that the requirement to declare the country of origin for import documents means declaring the country of modern discovery of the archaeological object.



TRAINING GAPS AND RECOMMENDATIONS

Findings of the Gap Study

The study determined that training available in the MENA region is supportive in financial crime investigations and can be related to artifact property crime, but there remains a gap in the shaping of these skills to the unique nature of these crimes.

1. Law enforcement in the MENA region need to have a substantial understanding of terror, criminal and hybrid networks and their operations as they apply to the cultural property supply chain. ^[1]_[SEP]
2. MENA law enforcement activity is largely limited to the MENA region which limits their abilities to conduct international investigations. ^[1]_[SEP]
3. The law enforcement personnel most in need of training in cultural property investigations may not receive it or have capacity to employ the training to actual investigations. ^[1]_[SEP]
4. While some training available to foreign law enforcement partners can be applied to investigating cultural property crime, the unique characteristics of this crime is not fully considered, and available resources not effectively utilized

Main goals of the training workshop hosted by SELEC

- Raise consciousness about the importance of the trade in illicit antiquities and the role that SELEC states could play in disrupting it.
- Learn about supply chain methodology that can be used to analyze the global trade in illicit antiquities and its links to terrorist finance.
- Understand the legal framework used by the international community for countering antiquities trafficking and seeking restitution/return.

Possible topics for the training workshop

We would propose covering any or all of the following topics.

- Overall supply chain and major trafficking routes for looted antiquities from Syria and Iraq
- Understanding of terror, criminal and hybrid networks and their operations as they apply to the cultural property supply chain
- New technologies for tracking sales across the global market place, including use of social media
- Specific attributes of trade in antiquities. How does its supply chain differ from other illicit trades?
- Importance of using subject matter experts for issues of provenance, artifact authentication and counterfeits



- Following the money. How does money laundering work and how can it be tracked through the international financial system?
- CTF issues -- where does terrorist finance intersect the antiquities supply chain?
- International and country-specific legal frameworks for countering antiquities trafficking
- Working with the international community on investigations and asset recovery

The training would include case studies and exercises, and could also include advanced investigative techniques if appropriate for the audience.



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