

## **ISIL and the Illicit Antiquities Trade**

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### **Abstract**

*As the Islamic State of Iraq and the Levant (ISIL) spreads across the Middle East and Africa, it continues to target the rich culture and history of the region. From the Nineveh Wall to Palmyra, ISIL has repeatedly drawn the ire of the international community through its indiscriminate destruction of ancient tombs, libraries, monuments, and cities. Drawing less attention, however, is ISIL's involvement in both the excavation and trafficking of antiquities onto the licit market, which accounts for a significant source of revenue.*

*The first section of the paper discusses ISIL's level of involvement in the illicit trafficking of antiquities, as well as the monetary value associated with the trade. In the following sections, the paper examines recent literature on antiquities trafficking networks, particularly in Cambodia, in order to conceptualize ISIL's operations in a theoretical framework. Through this analysis, the paper identifies some of the primary drivers of the illicit trade, the*

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*most significant being licit actors such as museums, auction houses, and private collectors. Finally, the paper investigates several cases in which the art community has entangled itself in the illicit trade and makes recommendations for minimizing that involvement, as well as recommendations for targeting the other stages of the trade.*

### **Introduction**

Khaled al-As'ad, a university professor and highly-respected scholar, spent decades studying the ancient history of Syria. In May, 2015, Khaled was working to preserve that history in Palmyra when the Islamic State of Iraq and the Levant (ISIL) captured the city. Three months later, ISIL fighters beheaded Khaled in a public square because he refused to give up the location of antiquities hidden throughout Palmyra.<sup>1</sup> He died in a final act of defiance and dedication to his life-long passion.

The Islamic State of Iraq and the Levant (ISIL) currently presents one of the greatest threats to peace and stability across the Middle East. In its reign of terror, ISIL has enslaved and murdered thousands of people who refuse to submit to its ideology. From coordinating complex attacks in Paris and Beirut to inspiring lone-wolf attacks in the United States, the group has also demonstrated an ability to export chaos and fear across the world. ISIL is especially unique, though, in its rapid ascension to becoming the richest terrorist group in the world today.<sup>2</sup>

ISIL has achieved this status through the systematic exploitation of the people and land under its control. Unlike many other groups, ISIL occupies a large amount of physical territory full of resources. Black market oil is one of the group's most lucrative resources, but ISIL has also developed an organized system for excavating and trafficking antiquities. Iraq and Syria are home to hundreds of historical locations, many of which are designated United Nations Educational, Scientific and Cultural Organization (UNESCO) World Heritage Sites.<sup>3</sup> These locations hold thousands of ancient manuscripts, statues, and other artifacts worth

millions of dollars. ISIL has rampaged through these sites, destroyed irreplaceable records of ancient history, and created a significant source of funding in the process. Through the lens of a theoretical framework, this paper analyzes ISIL's antiquities trafficking practices and assesses the most critical nodes of activity. Ultimately, this paper posits that individuals and groups working in the mainstream antiquities market play the most important role in the illicit market, and therefore present one of the best, and most vulnerable, targets for policy makers' efforts to disrupt this source of illegal income.

### **The Value of Looting Antiquities**

ISIL profits from the illicit sale of antiquities through two primary methods: 1) ISIL-run excavation and looting operations and, 2) the taxation of any non ISIL-run excavation, looting, or smuggling operations. According to one smuggler who works along the Turkey-Syrian border, ISIL *monitors* enforce khums, which is a 20 percent religious tax, on all business operations within ISIL-controlled territory.<sup>4</sup> In some instances, ISIL has taxed up to 50 percent on looted antiquities moving through Iraq and Syria.<sup>5</sup>

A small amount of quantitative data, however, makes it difficult to determine the exact amount of money ISIL makes through the illicit antiquities trade. In October 2014, David Cohen, the Under Secretary for Terrorism and Financial Intelligence at the U.S. Department of Treasury, listed extortion and criminal activity (including the illicit trade of antiquities) as two of the top five sources of funding for ISIL. Although his assessment did not provide dollar figures for each unique source of revenue, some reports indicate that individual artifacts recently smuggled out of Syria have been sold for over \$1 million U.S. Dollars.<sup>6 7</sup> U.S. State Department-funded archaeologist, Michael Danti, has actually estimated that the antiquities trade amounts to the second-largest source of income for ISIL, directly behind black market oil.<sup>8</sup> The U.S. Department of State also recently released a collection of documents recovered in Syria which provide insight into the means through which ISIL profits from the illicit

trade. Those documents will be analyzed later in this paper as part of an explanation of ISIL's trafficking operations.

The exact amount of money funneling into ISIL's pockets via the illicit antiquities trade may be unknown, but it is clear that the trade has played a significant role in supporting the group's operations. Much like al-Qa'ida in Iraq (AQI) at the height of its power, ISIL is resourcing the majority of its own funding, as opposed to receiving large sums of money from wealthy Gulf donors.<sup>9</sup> According to the Combating Terrorism Center at West Point, after the U.S.-led coalition attacked ISIL's oil production, the group expanded its antiquities trafficking operations to make up for the losses.<sup>10</sup> Therefore, it presents a necessary consideration in the efforts to bankrupt ISIL. This prompted the United Nations to pass UN Security Council Resolution 2199 in February, 2015, which reconfirmed a ban on looting Iraqi artifacts and created a new ban on the looting of Syrian artifacts.<sup>11</sup> In order to effectively target the trade, however, law enforcement and intelligence personnel must fully understand the methods through which ISIL is excavating and moving antiquities. Without access to ISIL-controlled territory, gaining an understanding of the group's operations presents a considerable challenge. The following section of this paper will review some of the recent literature on illicit antiquities trafficking in an effort to conceptualize ISIL's operations in a theoretical framework.

### **Four Stages of Trafficking Antiquities**

In the *International Journal of Cultural Property*, Peter Campbell described a four-stage model for the illicit trade of antiquities. According to Campbell, "four general stages are observable within the trade—looter, early stage middleman or intermediary, late stage intermediary, and collector—and more than one individual may occupy a stage."<sup>12</sup> An individual also may function in more than one stage.<sup>13</sup> In order to fulfill these separate roles, participants must have experience in a number of areas, including, "locating sites, transportation, transnational smuggling, laundering, and art history."<sup>14</sup> At each stage, the amount of specialized

knowledge required, as well as potential profits, increase. Campbell illustrated this in the diagram below.<sup>15</sup>

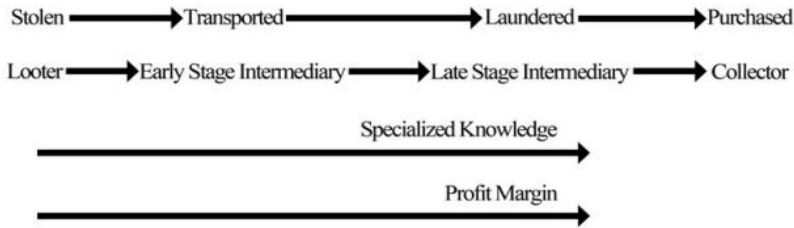


FIGURE 1. The four stages observed within antiquities trafficking illustrating how both specialization and profit increase through the stages.

Looters utilize their knowledge about the local area, including excavation sites and museum warehouses, in order to locate and dig out artifacts. Next, they sell the loot to smugglers, who use their knowledge of trafficking routes and contacts along borders to move the goods out of the country. During this stage, a number of individuals may be necessary to move across different borders. For instance, one smuggler may have the ability to move artifacts from Syria into Turkey; another smuggler may be required to move those same items from Turkey to Germany. Yet, both of those individuals operate as early-stage intermediaries. At the third stage, the goods are sold to late-stage intermediaries, who maintain contacts within both the illicit trafficking community and the mainstream art community. These individuals launder the goods by producing artificial records of sale and authorization for removing the items from the country of origin, enabling their entry into the licit market. Late-stage intermediaries allow museum curators, scholars, private collectors, and art dealers, who occupy the fourth and final stage, to turn a blind eye to the true origin of their purchases.<sup>16</sup>

In June 2014, Simon Mackenzie and Tess Davis conducted a case-study on temple looting in Cambodia in which they evaluated the illicit antiquities trafficking networks using this four-stage model. In their work, published in *The British Journal of Criminology*, Mackenzie and Davis concluded that the four-stage model accurately predicted the network they

observed in Cambodia. The nuances of the Cambodian network will be used later in this paper to assess looting operations in Syria and Iraq, thus a detailed explanation of this study is useful here. Mackenzie and Davis broke down their report by describing the actions of various characters at each stage of the model, beginning at the lowest level.<sup>17</sup>

**The Looter.** Thom operated at the first and second stages of the four-stage model, running both a low-level looting and delivery operation. Although Thom and his partner were firmly in charge at the top of the operation, below this hierarchy was a more fluid operating system of looters and temporary workers.<sup>18</sup> Each morning, Thom gathered a group of looters and transported them to various archaeological sites. Many of these individuals would go willingly, and in return they were paid a small sum of money. However, anyone who refused Thom's offer of employment was met with the threat of violence. Ultimately, the unwilling individuals participated in the looting operation, but received no pay in return. As is evident in other examples of forced labor, this allows the traffickers to earn a greater profit. Following the excavation and collection of statues, Thom consolidated the loot and delivered it to the city of Sisophon, which is located in the northwestern region of Cambodia, approximately 50 kilometers from the Thai border.<sup>19</sup>

**Early Stage Intermediaries.** In Sisophon, two brothers, known as Sambath and Phala, acted "as the north-western hub for Cambodian statue traffic, buying from the regional brokers and delivering the loot to the border with Thailand."<sup>20</sup> Their operation also falls within the second stage of the four-stage model. Interestingly, the two brothers were members of different military factions operating throughout the area, and when it came to business opportunities, cooperation between enemy groups was not uncommon. One brother collected payments, while the other transported the artifacts from Sisophon to the border with Thailand. It is also important to note that the brothers did not allow Thom to sell his loot to other middlemen; in fact, traffickers murdered Thom's uncle for attempting to circumvent their established network.

The standard procedure for setting up a purchase was that Thom would send the two brothers photographs of looted artifacts, and after an appraisal, the brothers would send a price back down to Thom.<sup>21</sup> Although some researchers have considered the possibility of collectors or dealers sending requests for specific artifacts down the chain, Thom stated that he had never seen such a request. This system demonstrates a method through which low-level intermediaries, provided the right connections, can receive competitive prices for their loot. These observations also show a clear hierarchical structure between the first and second stages of the four-stage model.

In Aranyaprathet, a southeastern border town in Thailand, an antiquities dealer named Rachana operated a small shop. He received statues from the brothers Sambath and Phala, and then transported them to Bangkok; this constitutes yet another link in the second stage of the four-stage model. Rachana often worked with the Thai military in his operations, and claimed to have “seen every statue that came from Cambodia in the last thirty years.”<sup>22</sup> He sold the statues in Bangkok with relative ease, and the buyers were often individuals who could then transport them out of the country.

**The Late Stage Intermediary.** Rachana’s trade in Bangkok led to one of these individuals, a dealer named Kanok who had spent decades buying looted statues in Bangkok.<sup>23</sup> Kanok functioned at the third stage of the four-stage model, acting as an intermediary between the licit and illicit markets. Kanok was a fence, who ‘faces both ways,’ [and] is therefore the personification of a sanitizing portal for loot, taking it by reaching down the trafficking chain with a dirty hand and passing it onwards up the supply chain with an apparently clean one.”<sup>24</sup> Late-stage intermediaries such as Kanok enable the entry of stolen artifacts into the mainstream art community and allow collectors to feign ignorance as to the provenance of their stolen treasures.

**Collectors.** Collectors, dealers, museums, and auction houses occupy the fourth and final stage of the four-stage model, but the mainstream art community is not simply the final destination for looted artifacts and

antiquities. In fact, it is an integral part of the criminal network. According to Neil Brodie, “in reality, if the trade is dependent for its health upon the ready availability of professional expertise, deployed in a variety of capacities, then the museum and academic professionals who provide this expertise must be considered to be part of the broader organization, even if in themselves they are not acting in a criminal fashion.”<sup>25</sup> These experts drive the demand for stolen antiquities by verifying authenticity and assigning value to them. However, the purchase of antiquities often falls into a gray area where documentation of provenance is unavailable, or even intentionally lost, and questionable documents obscure the fact that many items are sourced from conflict zones. As a result, investigations into stolen artifacts are routinely stymied by a lack of hard evidence.<sup>26</sup>

Analysis of the Cambodian trafficking network shows that the four-stage model is adequate for predicting the roles of individuals at each stage, but that there is a much more hierarchical, rather than horizontal, structure to antiquities trafficking. Top-down guidance on the pricing of antiquities, restrictions on when and where looters sell their goods, and well-established trade networks which have existed for decades are all evidence of this hierarchical structure.<sup>27</sup> The following section of this paper will apply this understanding of the four-stage model to the illicit trade of antiquities in Iraq and Syria, and show that ISIL has developed a hierarchical structure to manage the excavation and trafficking of antiquities, operates primarily at the first and second stages of the four-stage model, and profits significantly from these operations.

### **ISIL’s Antiquities Operations**

In order to build a profitable business, ISIL has developed an organized system for excavating and trafficking antiquities throughout Iraq and Syria. Cheikmous Ali, a Syrian archaeologist who has been working to protect Syria’s cultural heritage, claims that Syrian looting operations fall into four categories, ranging from random digging with shovels to technologically-assisted destruction of archaeological sites with heavy machinery.<sup>28</sup> Although these methods of excavation will yield variable

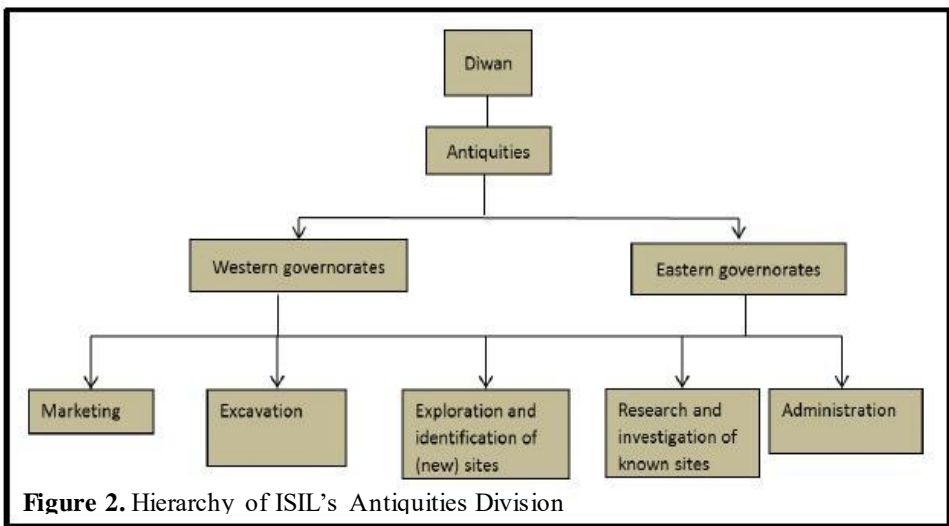


results, individuals involved in the illicit trade in Syria claim that ISIL is in control of nearly all of these operations.<sup>29</sup>

In a February, 2015 British Broadcasting Corporation (BBC) report, a smuggler who operates in Lebanon's Bekaa Valley, near the Syrian border, explained that ISIL is primarily responsible for looting antiquities in Syria.<sup>30</sup> He further explained that "friends" from Aleppo will transport antiquities to the border, and pay taxi drivers to smuggle them into the country.<sup>31</sup> In some cases, the artifacts are hidden in the belongings of refugees.<sup>32</sup> These friends are likely regional brokers, operating as looters and early-stage intermediaries, much like the Cambodian looter Thom. In the same report, a Turkish middleman working under the pseudonym "Ahmed" stated that he receives statues, coins, and other artifacts from Syrian smugglers, and delivers them to dealers. He also implicates ISIL as the main source of stolen artifacts, stating that "they come from the east of Syria, from Raqqa, all the areas controlled by ISIS."<sup>33</sup> Both Ahmed and the smuggler in Lebanon are early-stage intermediaries, running operations similar to that of the two brothers in Sisophon, Cambodia. Ahmed also mentions that Turkish merchants send European dealers pictures of their artifacts and receive prices in return, using an appraisal system very similar to the one observed in Cambodia.<sup>34</sup> These accounts indicate that ISIL is heavily involved in the illicit antiquities trade, and can successfully move goods from the first stage of looting to the middlemen in the third stage. However, they do not reveal the structure of ISIL's antiquities trafficking organization, nor do they show how ISIL actually profits from the trade. Although most of the information currently available comes from second-hand reporting, some recently released documents provide direct insight into ISIL's operations.

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In May, 2015, U.S. special operations forces raided the compound of ISIL leader Abu Sayyaf, who prior to his death was in charge of ISIL's oil, gas, and antiquities divisions. During the raid, special operations forces recovered a large cache of ancient coins, manuscripts, and other artifacts, as well as detailed records of ISIL's antiquities operations. These documents include memorandums banning unauthorized looting, organizational charts, and receipts for the sale of antiquities. The chart below, which has been translated into English, shows how ISIL's





**Figure 2.** Hierarchy of ISIL's Antiquities Division

antiquities division is organized hierarchically.<sup>35</sup>

The chart also shows that ISIL has divided its operations by both region and functional areas. The revelation of these five functional areas is important, as it confirms ISIL's involvement in both the looting and trafficking of antiquities. The presence of a marketing section could also indicate that ISIL is currently, or aspiring to, sell items directly to collectors. If true, then ISIL would effectively control the first, second, and third stages of the illicit antiquities trade in Iraq and Syria. Such a monopoly on operations would allow ISIL to demand nearly the full market value for any items sold out of its territory. Receipts collected

during the raid provide further insight into ISIL’s profits. The image below is a translation of one of those receipts.<sup>36</sup>

The Islamic State Diwan of Natural Resources Antiquities Division	In the name of Allah, the merciful, the compassionate  Collection receipt	Date: 06 DEC 2014 Number 101
I, the below signed:	<i>Abu-Sayyafal-'Iraqi</i>	
Received from the brother:		
The amount:	<i>2,960,000 SYP</i>	Written: <i>Two million nine hundred sixty thousand SYP exactly</i>
Notes:	<i>1/5<sup>th</sup> the value of the Antiquities Sold in Al Khayr governorate</i>	
Recipient signature: [Signature]	Submitter signature: [Signature] [Seal of the Diwan of Natural Resources, head of Antiquities]	

**Figure 3.** Example of ISIL Receipt Collected During Raid

First, it is important to note that this is a receipt for “1/5<sup>th</sup> the value of the Antiquities Sold in Al Khayr governorate.” Given ISIL’s use of khums of 20 percent, this receipt is most likely for taxes on independent looters or traffickers, and evidence of one of the primary methods through which ISIL profits from the illicit trade. This receipt, as well as the others recovered in raid, also reveals how much ISIL can make in a single transaction. In this case, ISIL earned 2,960,000 (Syrian Pounds), or 13,393 (U.S. Dollars), through taxing antiquities sold in the Al Khayr governorate on or around 06 December, 2014. Taking into account the two other receipts released by the Department of State, ISIL earned the equivalent of just under 24,000 (U.S. Dollars) between 06 December and 15 December, 2015, for taxes on antiquities sold in just one of the group’s many governorates. The full value of those items was approximately 120,000 (U.S. Dollars), and considering that ISIL also conducts its own looting and trafficking operations, this shows that ISIL is clearly in control of a significant source of income.<sup>37</sup>

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The presence of independent looters and traffickers is also an indication that below its hierarchical structure, ISIL allows for a more fluid system of looting, much like that observed in Cambodia. Although they act independently, recruiting their own workers and using their own equipment, these looters are under close scrutiny. The special operations raid on Abu Sayyaf recovered an administrative order prohibiting any member of the Islamic State to excavate antiquities “without receiving a stamped permit” issued by the Diwan of Natural Resources and Minerals – Antiquities Division.<sup>38</sup> ISIL is able to earn additional income through the issuance of these permits, and any person found to be in violation of this order is subject to penalty under Sharia law. Therefore, the antiquities division’s excavation section is probably responsible for both conducting ISIL-run excavation operations and enforcing these standards upon independent looters.

Upon the completion of these operations, and following the initial trafficking of antiquities out of Iraq and Syria, the items must move onto the licit market. Here, the third stage middlemen play a critical role. In Beirut, Lebanon, the BBC’s Simon Cox approached an antiquities dealer at his tourist shop in the center of town. Within ten minutes of discussion, during which Cox requested to purchase Syrian artifacts and export them to the United Kingdom, the dealer stated that if the purchaser was serious, he would be able to find a way. The Beirut dealer, much like the one in Bangkok, was willing and able to purchase antiquities from traffickers and launder those items through the production of false provenance documentation. These documents provide the collector cover in the event of an investigation, as well as enable the shipping of those items to any country in the world.

### **How the Art Community Drives Trafficking in Antiquities**

Simon Cox only presented himself as a collector to the dealer in Beirut, but in reality there are many private collectors, auction houses, and museums willing to purchase artifacts from these two-faced dealers. The link between dealers and smugglers is well known in the art community, and it would prefer to keep that hidden from the public.<sup>39</sup> This raises an

obvious question, though: who exactly is buying antiquities from these dealers? Surprisingly, it is often prestigious London art houses like Sotheby's and Christie's.<sup>40</sup> In fact, one archaeologist from Boston University referred to London as "the smuggling capital of the world."<sup>41</sup>

Sotheby's presents an especially interesting case. In October 1997, Sotheby's transferred its antiquities sales department from London to New York.<sup>42</sup> The move was in response to allegations by a British journalist named Peter Watson, who claimed that Sotheby's employees were assisting in smuggling antiquities out of countries like India and Cambodia, and violating a laundry list of import and export laws in the process.<sup>43</sup> In his 1997 book, *Sotheby's: The Inside Story*, Peter Watson explained how auction houses such as Sotheby's drive the illicit trade of antiquities. According to Watson, "30-40 percent of the world's available antiquities pass through [these] salerooms."<sup>44</sup> A large majority of those antiquities have no recorded provenance, and most of them are probably stolen. Auction houses like Sotheby's and Christie's provide a legitimate location to sell antiquities, but when they fail to do their due diligence, they allow trafficked antiquities to enter the legitimate market. Without this critical entryway onto the licit market, the illicit market would likely be much smaller.

Little has changed in the past 18 years. As of February, 2015, reports indicated that at least 100 Syrian artifacts had been looted by ISIL and trafficked into London.<sup>45</sup> Some of these collectors may not even realize that they are breaking the law, much less funding a terrorist group. In early 2015, an unnamed employee at a London art gallery casually told a Washington Post reporter that the gallery had recently purchased antiquities from Syria.<sup>46</sup> It is possible that the employee was not aware of recent changes to the laws outlawing the purchase of Syrian antiquities.

In some cases, though, collectors cannot claim ignorance as an excuse. In 2012, the Cambodian government requested the assistance of the United States government in recovering an ancient statue which was on the auction block at Sotheby's.<sup>47</sup> According to the New York Times, Cambodia alleged that the statue, valued between \$2 million and \$3

million, had been stolen during the Khmer Rouge's rule in the 1970's.<sup>48</sup> Numerous scholars and archaeologists backed up the Cambodian government's claim, and one lawyer proclaimed that "every red flag on the planet should have gone off when this was offered for sale... it screams 'loot.'"<sup>49</sup> Yet, Ms. Jane A. Levine, Sotheby's Worldwide Director of Compliance and an expert on cultural heritage law, argued that there was no proof the statue had been removed during the 1970s, and therefore no way to know that it was stolen.<sup>50</sup>

In September 2013, prosecutors accused Jane Levine of misleading federal agents in an effort to derail their investigation into the statue's provenance.<sup>51</sup> Ms. Levine allegedly attempted to prevent investigators from discovering documents which revealed that the statue's "asserted provenance" was forged.<sup>52</sup> The federal government's investigation eventually revealed that Sotheby's knew that the ancient statue had been stolen in the 1970s, and a scholar of Khmer art had advised Sotheby's not to sell it as there was clear evidence it was stolen.<sup>53</sup> In the end, the U.S. government forced Sotheby's to forfeit the statue and return it to the government of Cambodia.<sup>54</sup> However, that is where the consequences ended for Sotheby's and its employees.

Despite this black mark, Jane Levine remains in her position as Sotheby's Worldwide Director of Compliance.<sup>55</sup> Amazingly, she still holds her position on President Barack Obama's Cultural Property Advisory Committee where she "advise[s] the president (or his designee) on appropriate U.S. action in response to requests from State Parties for assistance in protecting their cultural heritage, pursuant to Article 9 of the 1970 UNESCO Convention."<sup>56</sup> This is not an attempt to damage Ms. Levine's or Sotheby's reputations, but rather it is meant to highlight the relative passiveness with which issues involving stolen antiquities are often approached by art collectors and auction houses. Sotheby's is far from the only auction house or dealer selling antiquities with questionable provenance. In 1997, researchers found that nearly 90 percent of auctioned antiquities had no recorded provenance.<sup>57</sup> Between 2001 and 2013, investigators recovered hundreds of stolen items, ranging from ancient Egyptian artifacts and Chinese figurines to Greek statues and Turkish

mosaics, from the auction houses of Sotheby's, Christie's, and Bonhams.<sup>58</sup> However, the guilty can quickly claim ignorance, citing a number of factors which might obscure the true provenance of a stolen artifact. Without the threat of serious legal action, art collectors will continue to place an emphasis on profit over provenance, further enabling the illicit market.

## **Recommendations**

Collectors and late-stage intermediaries drive the illicit antiquities market, and they also happen to present the most vulnerable links in the trade. While looters conduct their business in highly-contested conflict zones, and early-stage intermediaries stick to the shadows, late-stage intermediaries must maintain a reputation within the mainstream art community, and collectors' purchases are open to the public. However, this does not mean that looters and early-stage intermediaries are beyond the reach of the United States government. The United States should make a concerted effort to focus resources on detecting, discouraging, and disabling the key enablers at all stages of the illicit antiquities trade.

First, the U.S. government should increase law enforcement and intelligence collection on the illicit antiquities trade originating in Iraq and Syria. Given clear evidence that ISIL is profiting from the illicit antiquities trade, there should be little difficulty in justifying increased collection efforts under existing counterterrorism mandates. Just as the United States has focused its attention on ISIL's black market oil infrastructure, it should place a similar emphasis on collecting information on the location of equipment used to excavate ancient sites in Iraq and Syria. Earlier this year, the U.S. Department of State released imagery showing evidence of large-scale looting operations in several locations.<sup>59</sup> Intelligence like this is a great place to start. Law enforcement agencies should also increase their efforts to detect the purchase of stolen artifacts from Iraq and Syria, through both increased collection and partnership with foreign law enforcement entities.

Second, the United States should continue to discourage the illicit trade of antiquities through both deterrence and education. Under United Nations Resolution 2199, member states are required to ensure that their citizens do not provide economic aid to terrorist groups.<sup>60</sup> In late August, 2015, the Federal Bureau of Investigation issued an alert to all antiquities collectors and dealers to be “particularly careful trading Near Eastern antiquities, warning that artifacts plundered by terrorist organizations such as ISIL are entering the marketplace.”<sup>61</sup> The alert further reminded them that antiquities from Iraq are subject to Office of Foreign Assets Control sanctions under the Iraq Stabilization and Insurgency Sanctions Regulations (31 CFR part 576), and that providing funds to a terrorist group, even unintentionally, is prosecutable under 18 USC 233A.<sup>62</sup> The U.S. government should ensure that these alerts are disseminated to all audiences, including private collectors and hobbyists. Through education, the U.S. government can reduce demand for stolen antiquities from the unwitting buyer. In order to deter those collectors who knowingly purchase stolen goods, law enforcement agencies need to enforce these existing laws. The high-profile arrest of a Sotheby’s art dealer would send a strong message to anyone in the art community who participates in the trade of stolen goods.

Finally, the United States should utilize its full array of law enforcement and military tools to disable equipment, organized criminal networks, and other enablers related to the illicit antiquities trade. Following the detection of large-scale excavation sites in Iraq and Syria, the Department of Defense should conduct targeted air strikes on the heavy machinery and buildings used to facilitate those operations. The recent destruction of oil tankers in Syria provides a great example of how this can be done effectively. The United States should also exploit any intelligence gathered during the raid on antiquities division leader Abu Sayyaf, and aggressively pressure that network. This may lead to corrupt dealers in the art community, working at the third-stage of the illicit trade, and provide the necessary evidence to prosecute those individuals.

### **Conclusion**



On 13 November, 2015, ISIL members killed nearly 130 people, and wounded hundreds more, on a Friday night in Paris, France. Considering counterterrorism experts' cost estimates for previous attacks in Europe, the Paris operation likely cost no more than 20,000 (US Dollars).<sup>63</sup> This is less than ISIL makes in a single day by trafficking antiquities. ISIL has built an organized system for looting and trafficking antiquities from Iraq and Syria into the hands of corrupt dealers, and it will continue to earn significant profits through this trade without considerable intervention by the United States and its allies. That system, detailed in ISIL's own records, is a hierarchical organization that operates efficiently at the first and second stages of the illicit trade. The third and fourth stages of the trade, however, are occupied by the same fraudulent dealers and negligent art collectors seen all over the world. These key enablers allow ISIL to profit from the trade. This knowledge, if applied correctly, can help the United States and its allies more effectively target ISIL's finances and ultimately disrupt the group's ability to conduct attacks worldwide.

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<sup>2</sup> Naina Bajekal, "How to Financially Starve ISIS," *Time Magazine*, October 20, 2014, , accessed December 4, 2015, <http://time.com/3512917/isis-funding-stopping-iraq/>

<sup>3</sup> UNESCO, "List of World Heritage in Danger," accessed April 11, 2015, <http://whc.unesco.org/en/danger/>

<sup>4</sup> Simon Cox, "The men who smuggle the loot that funds IS," *BBC*, February 17, 2015, <http://www.bbc.com/news/magazine-31485439>

<sup>5</sup> Brigadier General (Ret.) Russell Howard, Marc Elliott, and Jonathan Prohov. "Digging In And Trafficking Out: How The Destruction Of Cultural Heritage Funds Terrorism," *Combating Terrorism Center's Sentinel Vol. 8, Issue 2*, accessed April 12, 2015,

<https://www.ctc.usma.edu/posts/digging-in-and-trafficking-out-how-the-destruction-of-cultural-heritage-funds-terrorism>

<sup>6</sup> Cox, “The men who smuggle.”

<sup>7</sup> David Cohen, U.S. Department of the Treasury, “Attacking ISIL’s Financial Foundation,” October 23, 2014, accessed March 23, 2015,

<http://www.treasury.gov/press-center/press-releases/Pages/jl2672.aspx>

<sup>8</sup> Howard, Elliott, and Prohov, “Digging In And Trafficking Out.”

<sup>9</sup> Lori Plotkin Boghardt, “Saudi Funding of ISIS,” *Washington Institute*, June 23, 2014, accessed April 12, 2015, <http://www.washingtoninstitute.org/policy-analysis/view/saudi-funding-of-isis>

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<sup>11</sup> United States Mission to the United Nations, “Fact Sheet: UN Security Council Resolution 2199 on ISIL,” February 12, 2015, accessed April 23, 2015,

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