

Bearing False Witness: The Media, ISIS and Antiquities

A Special Report from the Committee for Cultural Policy¹

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*“We have beautiful heroines, we have bad guys, we have supporters, we have the terrorists.”
Deborah Lehr of the Antiquities Coalition, speaking to the Middle East Institute, April 24, 2014²*

Introduction

Pockmarked satellite images of cultural heritage sites in Syria and Iraq incontrovertibly show a pandemic of destruction. What these images do not show us is *whether* any antiquities were found in these holes in the ground, *if* what was found had monetary value, or *where* these objects are going.

A campaign, based on hype and hysteria, without verifiable documentation of ISIS-connected illegal sales or analysis of legitimate market data, has made headlines for the last three years. The reflexive repetition of a false narrative about a multi-billion dollar illegal global antiquities market is an appalling example of herd behavior by the media and exposes its failure to investigate and corroborate its sources.

Rampant speculation about the supposed billions that ISIS has made off of looted antiquities in Syria and Iraq has set policy direction for US, UK, and European governments ever since the first images appeared of ISIS destroying heritage sites such as Palmyra, Mosul, and Nimrud, as part of ISIS’s larger reign of terror. It has been widely repeated by international organizations and in testimony before the US Congress and international legislatures, and is the false foundation for damaging legislation.

This story has distracted policy-makers from the substantive sources of terrorist-financing, and has given extremist advocates of nationalist interests a weapon to undermine the legitimacy of the global trade in art. It does more than threaten the existence of an antiquities trade that has existed lawfully for centuries. It also encourages a narrow, highly politicized view of culture that limits the ability of museums around the world to preserve art, study it, and show our shared human history to the public.

¹ By Katherine Brennan and Kate Fitz Gibbon for the Committee for Cultural Policy.

² Middle East Institute, *Stolen Heritage: Cultural Racketeering in Egypt*, YouTube (May 7, 2014) <https://youtu.be/h4BaIXjMWnw>.

Money is at the Heart of the Story

Big numbers get big attention. The self-replicating flood of press reports that ISIS is raking in millions in revenue from its illicit antiquities trade has prompted national governments to devote extensive discourse and resources to legislation and task forces to stop ISIS's antiquities profiteering.³ For example, the *Protect and Preserve International Cultural Property Act* (H.R. 1493), directing the US President to impose import restrictions on archaeological or ethnological material from Syria, was signed into law in May 2016. To support passage of the bill, a "Fact Sheet" was issued April 26, 2016, which stated that "ISIS earns tens of millions annually from looting and trafficking antiquities to fund terror." Representative Engel, who spearheaded the bill, stated that "ISIS has pocketed millions of dollars trafficking irreplaceable artifacts on the black market while simultaneously trying to wipe away an entire region's history."⁴

But no explanation or hard evidence has emerged to support the claim that ISIS in fact ever earned these "tens of millions annually." The failure to nail down any real numbers in light of increasing evidence that controverts such wildly high estimates requires us to question why legislators and reporters are placing such emphasis on the art trade, when ISIS's oil business, taxation, kidnapping and other means of funding have not received similar publicity (not to mention ISIS's brutal human rights violations).⁵

ISIS is not the first insurgent group to capitalize on the cultural heritage within Syria and Iraq - in 2013, even before ISIS's rise to power, Syrian rebels said in interviews that "average hauls can command \$50,000 on the black market," using antiquities to fund their efforts against Syrian President Bashar al-Assad.⁶

But the challenge in ISIS's case is that righteous and well-founded indignation about the televised destruction of antiquities has led to irresponsible speculation about looting.

³ *Statement by the Press Secretary on H.R. 1493 and H.R. 2908*, The White House, May 9, 2016, <https://obamawhitehouse.archives.gov/the-press-office/2016/05/09/statement-press-secretary-hr-1493-and-hr-2908>; Eileen Kinsella, *Are We Experiencing A New Boom in the \$3 Billion Global Antiquities Market?*, Artnet News, June 29, 2015; <https://news.artnet.com/art-world/increase-in-antiquities-smuggling-busts-amidst-government-crackdown-235536>; Joe Parkinson and Duncan Mavin, *West Seeks Tighter Curbs on Trade in Antiquities Looted by Islamic State*, The Wall Street Journal, Mar. 30, 2015, <https://www.wsj.com/articles/west-seeks-tighter-curbs-on-trade-in-looted-antiquities-1427761561>.

⁴ *Press Release: Senate Passes Engel Bill to Curb ISIS Antiquities Looting*, United States House of Representatives Committee on Foreign Affairs, Apr. 14, 2016, <https://democrats-foreignaffairs.house.gov/news/press-releases/senate-passes-engel-bill-curb-isis-antiquities-looting>.

⁵ Jose Pagilery, *Inside the \$2 billion ISIS war machine*, CNN, Dec. 11, 2015, <http://money.cnn.com/2015/12/06/news/isis-funding/>.

⁶ Taylor Luck, *Syrian rebels loot artifacts to raise money for fight against Assad*, The Washington Post, Feb. 12, 2013, https://www.washingtonpost.com/world/middle_east/syrian-rebels-loot-artifacts-to-raise-money-for-fight-against-assad/2013/02/12/ae0cf01e-6ede-11e2-8b8d-e0b59a1b8e2a_story.html?utm_term=.278b4cb67367.

Speculation that, when supported by limited or no documentation or proof has led to specious numbers and gross misstatements of fact. Speculation that has hampered efforts to grant safe harbor to at-risk objects in museums, caused the vilification of the legal art market, and generated demands for an end to the 2000-year-old global circulation of art.

The millions—and sometimes billions⁷—of dollars in revenue that ISIS is said, without evidence, to have made from its antiquities looting operations, have been attributed to a variety of factors. Weak enforcement of domestic laws and customs regulations have been cited for the cross-border trafficking of objects, and such is undoubtedly the case.⁸ (However, media articles on antiquities sales almost always fail to mention the obvious inauthenticity of the objects being traded. The very high number of fakes depicted in news reports about the illegal antiquities trade is not surprising, given the 2016 statement by Maamoun Abdulkarim, Syrian Director General for Antiquities and Museums, that upwards of 70% of Syrian antiquities marketed are fakes, surely a deterrent even to unscrupulous buyers.⁹ Reporters do not, as a rule, consult experts in the field.) Some observers have predicted ISIS may redirect its money-making strategies to the illicit antiquities trade as oil revenue diminishes, but none have shown that an actual market for such looted items exists.¹⁰

Regardless of the debate about ISIS's moneymaking strategies or criticism for lack of enforcement at Middle Eastern borders, the claim that sales of antiquities provide high levels of revenue ultimately requires that there be a demand for these objects. Media speculation has run rampant about buyers in market countries like the United States and Great Britain or in neighboring Gulf States who are said to be clamoring to buy looted antiquities¹¹—even when others point out that any object originating in well-documented locales such as Palmyra would be virtually unsellable, especially given ISIS's well-publicized and appalling actions there.¹² Art dealers and collectors, as a group, care about ancient history, support both museums and monument preservation, and are deeply distressed by the appalling and irreversible destruction that ISIS has wreaked in Syria and Iraq.

⁷ Bel Trew, *Antiquities experts call for war on Isis looting in Syria and Iraq*, The Times, Aug. 12, 2017, <https://www.thetimes.co.uk/article/antiquities-experts-call-for-war-on-isis-looting-3xz5d59lt>.

⁸ Steven Lee Myers and Nicholas Kulish, *'Broken System' Allows ISIS to Profit From Looted Antiquities*, The New York Times, Jan. 9, 2016, https://www.nytimes.com/2016/01/10/world/europe/iraq-syria-antiquities-islamic-state.html?_r=1.

⁹ Vincent Noce, *Islamic State's looting of antiquities is rising but hard facts remains scarce*, The Art Newspaper, Oct. 19, 2017, <http://theartnewspaper.com/news/islamic-states-looting-of-antiquities-is-rising-but-hard-facts-remain-scarce>.

¹⁰ Benoit Faucon, Georgi Kantchev, and Alistair MacDonald, *The Men Who Trade ISIS Loot*, The Wall Street Journal, last updated Aug. 6, 2017, <https://www.wsj.com/articles/the-men-who-trade-isis-loot-1502017200>.

¹¹ Nigel Morris, *Call for UK to take tougher action to save antiquities from ISIS*, The Independent, Feb. 11, 2015, <http://www.independent.co.uk/news/science/archaeology/call-for-uk-to-take-tougher-action-to-save-antiquities-from-isis-10039793.html>.

¹² Ben Taub, *The Real Value of the ISIS Antiquities Trade*, The New Yorker, Dec. 4, 2015, <https://www.newyorker.com/news/news-desk/the-real-value-of-the-isis-antiquities-trade>.

The Excuse for Bad Numbers: “No one really knows.”

A frequently heard caveat in the grossly exaggerated reports on ISIS’s art trade is that “no one really knows.” Agreed. Yet that statement is no excuse for promoting completely fabricated estimates of millions or billions in sales of antiquities for which there is no evidence. The one thing that all reporters and pundits seem to agree on is “no one seems to agree how much money it’s actually making,”¹³ and that estimates “vary wildly.”¹⁴ Even when the first reports of Syrian rebels funding themselves with looted antiquities emerged in 2013, *The Washington Post* acknowledged that “the extent of the trade is unknown because of difficulties accessing historical sites in the war-torn country, according to UNESCO.”¹⁵

Advocates for focusing extensive resources on combatting ISIS’s antiquities trade, such as Deborah Lehr of the Antiquities Coalition, an organization that has repeatedly publicly claimed that there was a multi-billion dollar illegal antiquities trade, now acknowledge that “[t]he biggest challenge in this field is that there’s no real information or statistics on the size of this illegal trade.”¹⁶

Such a statement from the Antiquities Coalition is particularly worrisome given that the Antiquities Coalition was a primary source for the spread of unsupported statistics and deceptive data connecting ISIS to the antiquities market. Sometimes these manipulated assertions were conveyed through innuendo and inferences and sometimes through direct accusations in speeches and testimony. In one presentation at the Middle East Institute in 2014, Lehr throws out several enormous estimations of profits from “cultural racketeering” and antiquities looting, including:

- A “very conservative estimate” of \$3 billion in Egypt since the revolution in 2011, based on satellite imagery and sales on the local markets.
- And then later, “With Egypt, it is probably 3-10 billion, globally it has to be a much more significant number.”
- “Coming out of Syria, it is \$2 billion.”¹⁷

¹³ Fiona Rose-Greenland, *Inside ISIS’ looted antiquities trade*, *The Conversation*, May 30, 2016, <http://theconversation.com/inside-isis-looted-antiquities-trade-59287>.

¹⁴ Robbie Gramer, *UNESCO Fights Back As ISIS Tries to Stamp Out Culture*, *Foreign Policy*, Apr. 12, 2017, <http://foreignpolicy.com/2017/04/12/unesco-united-nations-isis-islamic-state-cultural-antiquities-trade-irina-bokova-refugees-heritage/>

¹⁵ Luck, *supra* note 6.

¹⁶ Jim Michaels, *Demand still high for ISIL’s stolen antiquities from Palmyra, elsewhere*, *USA Today*, Mar. 31, 2016, <https://www.usatoday.com/story/news/world/2016/03/31/demand-still-high-isis-stolen-antiquities-palmyra-elsewhere/82476346/>.

¹⁷ Middle East Institute, *Stolen Heritage: Cultural Racketeering in Egypt*, YouTube (May 7, 2014) <https://youtu.be/h4BaXjMWnw>.

Although these numbers weren't expressly linked to ISIS's revenues, such sentiments nevertheless laid the groundwork for the Antiquities Coalition's later efforts. For example, the Antiquities Coalition partnered with the Asia Society and Middle East Institute as the #CultureUnderThreat Task Force, which published an April 2016 report that summarily declared a causal effect between the "multi-billion dollar demand for art and antiquities" and the looting and destruction of antiquities sites.¹⁸

No evidence within the report itself supports the "multi-billion dollars" in revenue to terrorist organizations like ISIS beyond repeating the oft-quoted \$1.25 *million* estimation from the Abu Sayyaf raid and warnings from the State Department that "Daesh has earned several *million* dollars from antiquities trafficking since mid-2014."¹⁹ Despite the obvious difference between "million" and "billion," the description of a "multi-billion industry" in looted antiquities which funds organizations like ISIS has been misleadingly repeated by the Antiquities Coalition's own publications and others.²⁰

But the lack of any factual basis for the so-called millions and billions in revenue has not stopped major media outlets such as *Foreign Policy Magazine* from stating, without explanation, that ISIS's antiquities trade is "surely worth millions."²¹ Even as recently as August 2017, *The Wall Street Journal* estimated the amount to range between "the low tens of millions to \$100

¹⁸ #CultureUnderThreat: *Recommendations for the U.S. Government* at 6, Apr. 2016, <http://taskforce.theantiquitiescoalition.org/wp-content/uploads/2015/01/Task-Force-Report-April-2016-Complete-Report.pdf>. (Citing Andrew Keller, *Documenting ISIL's Antiquities Trafficking: The Looting and Destruction of Iraqi and Syrian Cultural Heritage: What We Know and What Can Be Done*, United States Department of State, Sept. 29, 2015, <https://2009-2017.state.gov/e/eb/rls/rm/2015/247610.htm>.)

¹⁹ #CultureUnderThreat: *Recommendations for the U.S. Government* at 10, Apr. 2016, <http://taskforce.theantiquitiescoalition.org/wp-content/uploads/2015/01/Task-Force-Report-April-2016-Complete-Report.pdf>. (Citing a now defunct State Department publication: U.S. Department of State, *Documenting ISIL's Antiquities Trafficking: The Looting and Destruction of Iraqi and Syrian Cultural Heritage: What We Know and What Can Be Done*, 2015, <http://www.state.gov/e/eb/rls/rm/2015/247610.htm>, but presumably citing Andrew Keller, *Documenting ISIL's Antiquities Trafficking: The Looting and Destruction of Iraqi and Syrian Cultural Heritage: What We Know and What Can Be Done*, United States Department of State, Sept. 29, 2015, <https://2009-2017.state.gov/e/eb/rls/rm/2015/247610.htm>.)

²⁰ Various Authors, #CultureUnderThreat Task Force Unveils Recommendations to Combat Antiquities Trafficking, Middle East Institute, Apr 13, 2016, <http://www.mei.edu/content/cultureunderthreat-task-force-unveils-recommendations-combat-antiquities-trafficking>; Karin Zeitvogel, *Destruction, Looting of Antiquities Robs Nations of Their Heritage, Bankrolls Terrorism*, The Washington Diplomat, May 5, 2017, http://www.washdiplomat.com/index.php?option=com_content&view=article&id=15257:destruction-looting-of-antiquities-robs-nations-of-their-heritage-bankrolls-terrorism&catid=1557&Itemid=428. (Reposted on the Antiquities Coalition's website: <https://theantiquitiescoalition.org/ac-news/destruction-looting-of-antiquities-robs-nations-of-their-heritage-bankrolls-terrorism/>); *Think Tank*, Antiquities Coalition, <https://theantiquitiescoalition.org/cultural-heritage-think-tank/>

²¹ Justine Drennan, *The Black-Market Battleground*, Foreign Policy, Oct. 17, 2014, <http://foreignpolicy.com/2014/10/17/the-black-market-battleground/>.

million,” citing archaeologist Dr. Michael Danti for the low estimate and a French security official for the high one.²²

How the Misstatements of Fact Began: “\$36 Million in looted antiquities”

One of the most prevalent numbers thrown around in the media was a 2014 estimate of \$36 million in ISIS revenue from its antiquities looting. The problem is - it’s not true. What started as an article offering a statistic on the sum total of all of ISIS’s revenue in a particular region was reinterpreted in the media and by anti-trade advocates as a statement of the sum total of ISIS’s revenue from antiquities looting alone.

On June 15, 2014, Martin Chulov of *The Guardian* reported that in one area of Syria alone, ISIS had raised \$36 million in funding.²³ According to one source, the \$36 million figure was the first fixed dollar amount supported by substantiated documents.²⁴ In Chulov’s article, he detailed how in a raid on ISIS leader Abu Abdulrahman al-Bilawi’s hideout, 160 computer flash drives were found—giving counterintelligence the first substantive insight into ISIS’s funding operations. In the article, one intelligence officer reported that they had found spreadsheets that indicated that ISIS “had taken \$36mn from [the mountainous region] of al-Nabuk alone. The antiquities there are up to 8,000 years old.”

Within the context of Chulov’s article, the \$36 million number refers not to the sale of antiquities alone, but instead to ISIS’s cumulative activities in the al-Nabuk region, including the commandeering of oilfields and pillage of raw materials—as well as antiquities looted from archaeological digs.

But this one figure became one of the most widely promulgated false ‘factoids’ to demonstrate ISIS’s unquenchable thirst for looted antiquities. Since the number was initially reported on June 15, 2014, it has been re-characterized as representing only the antiquities trade in the region and achieved a certain amount of longevity in the press.

Selected 2014 press reports using the false numbers:

- Martin Chulov, *How an arrest in Iraq revealed Isis’s \$2bn jihadist network*, *The Guardian*, June 15, 2014, <https://www.theguardian.com/world/2014/jun/15/iraq-isis-arrest-jihadists-wealth-power>.

²² Faucon et al., *supra* note 10.

²³ Martin Chulov, *How an arrest in Iraq revealed Isis’s \$2bn jihadist network*, *The Guardian*, June 15, 2014, <https://www.theguardian.com/world/2014/jun/15/iraq-isis-arrest-jihadists-wealth-power>.

²⁴ Christopher Jones, *How Much Money is ISIS Making from Antiquities Looting?*, *Gates of Nineveh*, Jan. 12, 2016, <https://gatesofnineveh.wordpress.com/2016/01/12/how-much-money-is-isis-making-from-antiquities-looting/>.

- Ian Black, et al, *The Terrifying rise of Isis: \$2bn in loot, online killings and an army on the run*, The Guardian, June 16, 2014, <https://www.theguardian.com/world/2014/jun/16/terrifying-rise-of-isis-iraq-executions> (Stating that an intelligence official told the Guardian that Isis took \$36m from al-Nabuk, an area in the Qalamoun mountains west of Damascus, including antiquities that are up to 8,000 years old.)
- Kathleen Caulderwood, *How ISIS Pillages, Traffics And Sells Ancient Artifacts On Global Black Market*, IB Times, June 18, 2014, <http://www.ibtimes.com/how-isis-pillages-traffics-sells-ancient-artifacts-global-black-market-1605044>.
- *ISIS Cashing in on Looted Antiquities to Fuel Iraq Insurgency*, National Geographic, June 27, 2014, <https://news.nationalgeographic.com/news/2014/06/140626-isis-insurgents-syria-iraq-looting-antiquities-archaeology/>. (Claiming that in one region of Syria alone, the group reportedly netted up to \$36 million from activities that included the smuggling of plundered artifacts.)
- Jason Felch, *Twenty Percent: ISIS “Khums” Tax on Archaeological Loot Fuels the Conflicts in Syria and Iraq*, Chasing Aphrodite, Aug. 14, 2014, <https://chasingaphrodite.com/2014/08/14/twenty-percent-isis-khums-tax-on-archaeological-loot-fuels-the-conflicts-in-syria-and-iraq/>. (Noting that the \$36 million was not independently verified.)
- *Mark Vlasic: Illicit trade in looted antiquities helps finance ISIS terror network*, National Post, Sept. 15, 2014, <http://nationalpost.com/opinion/mark-vlasic-illicit-trade-in-looted-antiquities-helps-finance-isis-terror-network>.
- *How the West buys ‘conflict antiquities’ from Iraq and Syria (and funds terror)*, Reuters, Oct. 27, 2014, <http://blogs.reuters.com/great-debate/2014/10/27/how-the-west-buys-conflict-antiquities-from-iraq-and-syria-and-funds-terror/>. (Stating an Iraqi intelligence claim that Islamic State alone has collected as much as \$36 million from the sales of artifacts, some of them thousands of years old. Claiming that although the accounts data have not been released for verification, whatever the exact number is, the sale of conflict antiquities to fund military and paramilitary activity is real and systematic.)
- Sam Hardy, *German Media May Corroborate \$36M Islamic State Antiquities Trafficking*, Hyperallergic, Nov. 28, 2014 <https://hyperallergic.com/165537/german-media-corroborates-36m-islamic-state-antiquities-trafficking/>.
- Aliaume Leroy, *Smuggled Antiquities Fund ISIL’s Campaigns*, Bellingcat, Dec. 6, 2014, <https://www.bellingcat.com/news/mena/2014/12/06/smuggled-antiquities-fund-isils-campaigns/>. (Updated to reflect that “\$36 Million from the sale of antiquities found in al-Nabuk alone” has been “denied by various experts and archaeologists.”)

2015

- Joe Parkinson et al., *Syrian ‘Monuments Men’ Race to Protect Antiquities as Looting Bankrolls Terror*, The Wall Street Journal, Feb. 10, 2015,

<https://www.wsj.com/articles/syrian-monuments-men-race-to-protect-antiquities-as-looting-bankrolls-terror-1423615241>.

- Marissa Fessenden, *Can Antiquities Looting in Syria Be Stopped?* Smithsonian, Feb. 12, 2015, <https://www.wsj.com/articles/syrian-monuments-men-race-to-protect-antiquities-as-looting-bankrolls-terror-1423615241>.
- Brigadier Gen. (Ret.) Russell Howard, et al., *Digging in and Trafficking Out: How the Destruction of Cultural Heritage Funds Terrorism*, Combating Terrorism Center Sentinel, Feb. 27, 2015, <https://www.wsj.com/articles/syrian-monuments-men-race-to-protect-antiquities-as-looting-bankrolls-terror-1423615241>. (Noting that the files alleging that ISIS “derived \$36 million from antiquities smuggling in the al-Nabuk region” remain unverified.)
- Katy Gregory, *ISIL Making Millions From Looted Antiquities*, Huffington Post, Mar. 6, 2015, http://www.huffingtonpost.co.uk/katy-gregory/isil-making-millions-from_b_7480792.html. (“Listed among ISIL’s key financial transactions were records of illicit antiquity trafficking. In one region of Syria alone, the group reportedly netted up to \$36 million from such activities.”)
- Congressman Keating evidently specifically cited the \$36 million figure during the mark-up of HR 1493, April 23, 2015.²⁵
- David Francis, *A How-To Guide to Buying Artifacts Looted by the Islamic State*, Foreign Policy, May 28, 2015, <http://foreignpolicy.com/2015/05/28/a-how-to-guide-to-buying-artifacts-looted-by-the-islamic-state/>. (“Relics taken from one region of Syria alone reportedly enriched the Islamic State by \$36 million, and Americans are among their biggest buyers.”)
- Deborah Lehr and Peter Herdich, *Trading Treasure for Weapons: ISIS Campaign of Terror Strikes at Culture*, Huffington Post, June 19, 2015, https://www.huffingtonpost.com/deborah-lehr/trading-treasure-for-weap_b_5794902.html. (“ISIS netted up to \$36 million from looted antiquities in just one area of Syria alone, according to The Guardian.”)
- Laura King and Nabih Bulos, *Islamic State doesn’t destroy all antiquities — it saves some to sell on the black market*, Los Angeles Times, Aug. 24, 2015, <http://www.latimes.com/world/middleeast/la-fg-islamic-state-ancient-temple-20150824-story.html>. (Citing an economics paper by Rim Turkmani: “They only destroy traceable items, and attempt to sell the rest,” Turkmani wrote. As a single example, she said, memory sticks obtained after an arrest of Islamic State militants in Iraq revealed \$36 million in revenues from the selling of antiquities from a single venue—Syria’s Nabek district, 50 miles north of Damascus and the site of an Abyssinian monastery.”)

2016

²⁵ Peter Tompa, *ISIS and Antiquities Sales: Fact or Fantasy?* Committee for Cultural Policy, Nov. 13, 2015, <https://committeeforculturalpolicy.org/isis-and-antiquities-sales-fact-or-fantasy/>.

- David Grantham, *ISIS and the Antiquities Trade—Looting to Sustain Terrorism*, Inside Sources, Jan. 18, 2016, <http://www.insidesources.com/isis-and-the-antiquities-trade-looting-to-sustain-terrorism/>. (“The Islamic State has reportedly earned anywhere between \$36 and \$360 million from the sale of antiquities looted from areas under its control.”)
 - Reprinted in David Grantham, *ISIS and the Antiquities Trade—Looting to Sustain Terrorism*, Tulsa World, Jan 31, 2016, http://www.tulsaworld.com/opinion/othercolumnists/david-grantham-isis-and-the-antiquities-trade---/article_5c826ee4-1c86-5050-b23b-a29776c13cd2.html.
- Malcolm Nance, *Defeating ISIS: Who They Are, How They Fight, What They Believe*, at 294 (Skyhorse Publishing Mar. 8, 2016).²⁶

Very few sources distinguished that antiquities only make up a portion of the \$36 million, and even fewer reports directly contradicted the “commonly quoted figure that the [...] group had made at least \$36 million from looted antiquities.”²⁷

A similar reporting oversight occurred with respect to Michael Danti’s proposition that looting is “the second largest source of revenue”²⁸ for ISIS. Some, including the Wall Street Journal, subsequently equated “looting” exclusively with “looting of antiquities” in their reporting.²⁹ However others have been quick to point out that “looting” data refers to the value of all commodity looting, what Jason Felch termed “the spoils of war.”³⁰

A Numbers Game: Million Become Billions

Some estimations have caught on more than others, particularly in 2015 after ISIS had achieved the height of its power:

²⁶ <https://www.amazon.com/Defeating-ISIS-They-Fight-Believe/dp/1510711848>.

²⁷ Christopher Jones, *New Documents Prove ISIS Heavily Involved in Antiquities Trafficking*, Gates of Nineveh, Sept. 30, 2015, <https://gatesofnineveh.wordpress.com/2015/09/30/new-documents-prove-isis-heavily-involved-in-antiquities-trafficking/>.

²⁸ Michael Danti’s estimate first appeared in Drennan’s article: “according to Danti, ISIS’s profits from looting may be second only to the revenue the group derives from illicit oil sales.” Justine Drennan, *The Black-Market Battleground*, Foreign Policy, Oct. 17, 2014, <http://foreignpolicy.com/2014/10/17/the-black-market-battleground/>.

²⁹ Duncan Mavin, *Calculating the Revenue From Antiquities to Islamic State*, The Wall Street Journal, Feb. 11, 2015, <https://www.wsj.com/articles/calculating-the-revenue-from-antiquities-to-islamic-state-1423657578>.

³⁰ Jason Felch, *Danti’s Inference: The Known Unknowns of ISIS and Antiquities Looting*, Nov. 18, 2014, <https://chasingaphrodite.com/2014/11/18/dantis-inference-the-known-unknowns-of-isis-and-antiquities-looting/>.

“Billions”: Sources such as *Esquire*³¹ and, more recently *The Times* (August 2017)³² have speculated that ISIS could be earning billions in its illicit antiquities trade. In February 2014, Francesco Bandarin, Assistant Director-General for Culture UNESCO stated in a news conference that “Antiquities plundering and trafficking is estimated to turn a \$7 billion underground profit.”³³ Bandarin’s statement was later cited in *Fox News* and *The Daily Mail*,³⁴ CNN,³⁵ and as late as June 2014 in NBC News.³⁶

But also in 2014 and 2015, news reports estimated ISIS’s total assets at \$2 billion, with one account failing to include antiquities looting in its final calculations.³⁷ In fact, antiquities sales failed to make the list of ISIS’s major revenue sources in a comprehensive 2014 investigation by *Die Zeit*.³⁸ These investigations not only dismiss the importance of ISIS’s antiquities revenue, they also estimate ISIS’s *total* assets at a much smaller number than that “\$7 billion” and other similarly outrageous estimations.

Others have nonetheless extrapolated on that number and estimated that 30-50% of ISIS total \$2 billion revenue “comes from the sale of looted artifacts,”³⁹ which would amount to \$600 million to \$1 billion—and would surpass the \$500 million in oil that ISIS was estimated to have earned in 2014.⁴⁰

³¹ *Hobby Lobby was Buying Biblical Artifacts Plundered from Iraq*, *Esquire*, July 6, 2017, <http://www.esquire.com/news-politics/news/a56139/hobby-lobby-biblical-artifacts/>.

³² Trew, *supra* note 7.

³³ *Press Conference by Francesco Bandarin*, UNESCO Assistant Director-General for Culture, UNESCO, Feb. 5, 2014, <http://webtv.un.org/watch/press-conference-by-francesco-bandin-unesco-assistant-director-general-for-culture/4041211028001/?term=>.

³⁴ *UN says illegal excavations in Syria are ‘lethal’ to its heritage*, *Fox News*, Feb. 5, 2014, <http://www.foxnews.com/world/2014/02/05/un-says-illegal-excavations-in-syria-are-lethal-to-its-cultural-heritage.html>; *UN says illegal excavations in Syria are ‘lethal’ to its heritage*, *Daily Mail*, Feb. 5, 2014, <http://www.dailymail.co.uk/wires/ap/article-2552770/UN-says-illegal-excavations-Syria-lethal.html>. (both reposting the Associated Press).

³⁵ Laura Allsop, *Looting of Libyan Treasure Highlights illicit antiquities trade*, CNN, Nov. 11, 2011, <http://www.cnn.com/2011/11/11/world/europe/looted-treasure-libya/index.html>.

³⁶ *How Terrorists Tap a Black Market Fueled by Stolen Antiquities*, NBC News, June 23, 2014, <https://www.nbcnews.com/storyline/iraq-turmoil/how-terrorists-tap-black-market-fueled-stolen-antiquities-n137016>.

³⁷ Chulov, *supra* note 23; Jose Pagliery, *Inside the \$2 billion ISIS war machine*, CNN, Dec. 11, 2015, <http://money.cnn.com/2015/12/06/news/isis-funding/>.

³⁸ Onur Burcak Belli, et al., *The Business of the Caliph*, *Die Zeit*, Dec. 4, 2014, <http://www.zeit.de/feature/islamic-state-is-caliphate>.

³⁹ Rajendra Abhyankar, *Syrian “Blood Antiquities” Proliferate Urgent Need for an International Agreement*, *Huffington Post*, Nov. 3, 2014, https://www.huffingtonpost.com/rajendra-abhyankar/syrian-blood-antiquities-_b_6095248.html.

⁴⁰ Pagliery, *supra* note 37.

\$1 Million Per Object: Sources in the United Kingdom, such as the *BBC*,⁴¹ *The Independent*⁴² and *The Daily Mail*,⁴³ reported in February 2015 that participants in ISIS's illicit antiquities market stated that some looted objects sold for \$1 million each. The Daily Mail stated, "Looted from ancient buildings in ISIS strongholds, such as the group's de facto capital city Raqqa, the antiquities are up to 10,000-years-old and can exchange hands for more than \$1 million each," citing "a BBC investigation."⁴⁴

\$300 Million: Eileen Kinsella of *Artnet News* cited "experts" for a \$300 million estimation in June 2015.⁴⁵

"Hundreds of Millions of Dollars": In September 2015, *CBS News* reported that, according to Treasury officials, ISIS's antiquities "transactions totaled hundreds of millions of dollars," echoing earlier estimations by *Newsweek* and *The Independent*.⁴⁶

"100 Million Annually": Some media outlets have also "calculated" the total volume of ISIS's looted antiquities sales to amount to \$100 million annually, as recently as November 2017.⁴⁷ For the number's origin, *The Wall Street Journal* cited both "U.S. officials" and an "unnamed French security official," in February 2015.⁴⁸ *The New York Times* and later the *World Economic Forum*

⁴¹ Simon Cox, *The Men who smuggle the loot that funds ISIS*, BBC, Feb. 17, 2015, <http://www.bbc.com/news/magazine-31485439>.

⁴² Heather Saul, *Isis partly funded by Syrian looted artefacts worth up to \$1m — but who is buying them?*, *The Independent*, Feb. 18, 2015, <http://www.independent.co.uk/news/world/middle-east/isis-partly-funded-by-syrian-looted-artefacts-worth-up-to-1m-but-who-is-buying-them-10053638.html>.

⁴³ John Hall, *The ISIS smugglers making up to \$1million per item selling ancient antiquities looted from the rubble of Syria*, *The Daily Mail*, Feb. 17, 2015, <http://www.dailymail.co.uk/news/article-2957240/The-ISIS-smugglers-making-1million-item-selling-ancient-antiquities-looted-rubble-Syria.html>.

⁴⁴ *Id.*

⁴⁵ Eileen Kinsella, *Are We Experiencing A New Boom In the \$3 Billion Global Antiquities Market*, *Artnet News*, June 29, 2015, <https://news.artnet.com/art-world/isis-selling-looted-antiquities-312593>.

⁴⁶ Margaret Brennan, *ISIS cashing in on selling plundered antiquities to fund terror*, *CBS News*, Sept. 29, 2015, <https://www.cbsnews.com/news/isis-relying-on-smuggling-antiquities-to-fund-terror/>; Janine di Giovanni, Leah McGrath Goodman, and Damien Sharkov, *How does ISIS Fund Its Reign of Terror*, Nov. 6, 2014, <http://www.newsweek.com/2014/11/14/how-does-isis-fund-its-reign-terror-282607.html>; Nigel Morris, *Call for UK to take tougher action to save antiquities from ISIS*, *The Independent*, Feb. 11, 2015, <http://www.independent.co.uk/news/science/archaeology/call-for-uk-to-take-tougher-action-to-save-antiquities-from-isis-10039793.html>.

⁴⁷ Dave Sadler, *ISIS Makes up to \$100 Million A Year Smuggling Ancient Artifacts from Iraq and Syria*, *The Archaeology and Metal Detecting Magazine*, Nov. 11, 2017, <http://archmdmag.com/isis-makes-up-to-100-million-a-year-smuggling-ancient-artifacts-from-iraq-and-syria/>.

⁴⁸ Joe Parkinson, Ayla Albayrak and Duncan Mavin, *Syrian 'Monuments Men' Race to Protect Antiquities as Looting Bankrolls Terror*, *The Wall Street Journal*, Feb. 10, 2015, <https://www.wsj.com/articles/syrian-monuments-men-race-to-protect-antiquities-as-looting-bankrolls-terror-1423615241>; Benoit Faucon, Georgi Kantchev, and Alistair MacDonald, *The Men Who Trade ISIS Loot*, *The Wall Street Journal*, last updated Aug. 6, 2017, <https://www.wsj.com/articles/the-men-who-trade-isis-loot-1502017200>.

cited Iraqi United Nations ambassador Mohamed Ali Alhakhim for the number's origin, but emended the estimations with a note that "the origin of that figure is unclear."⁴⁹

Nevertheless, the \$100 million number has been promulgated among other sources, including *Newsweek* and *The Baghdad Post*.⁵⁰ It is found on conspiracy theorist forums⁵¹ and in published books such as Craig A. Evans and Jeremiah J. Johnston's *Jesus and the Jihadis: Confronting the Rage of ISIS: The Theology Driving the Ideology* (Oct. 20 2015), which includes both the \$100 million figure, with no explanation or support, and the misstatement mentioned earlier that looting is ISIS's second largest revenue generator:

"Few are aware the second largest revenue generator for the Islamic State is the sale of looted antiquities from museums, private collections, and hundreds of archeological sites across Iraq and Syria, yielding over \$100 million per year. One report revealed that over a hundred Byzantine and Roman artifacts have been smuggled by the Islamic State for sale in the United Kingdom alone."

Others, such as *The Huffington Post*, cited Ambassador Mohamed Ali Alhakim's \$100 million figure, but noted that the State Department estimates revenue of only "several million dollars."⁵²

Between \$150 million and 200 million, annually...

On March 31, 2016, then Russian ambassador to the United Nations Vitaly Churkin wrote a letter notifying the United Nations Security Council of ISIS's active trade in antiquities,

⁴⁹ Rick Gladstone, *U.N. Resolves to Combat Plundering of Antiquities by ISIS*, *The New York Times*, May 28, 2015, <https://www.nytimes.com/2015/05/29/world/middleeast/un-resolves-to-combat-plundering-of-antiquities-by-isis.html>; Mark V. Vlasic and Helga Turku, *Our cultural heritage is under attack. We must all join the fight to protect it*, *World Economic Forum*, Oct. 11, 2016, <https://www.weforum.org/agenda/2016/10/our-cultural-heritage-is-under-attack-we-must-all-join-the-fight-to-protect-it/>.

⁵⁰ Callum Paton, *ISIS makes up to \$100 million a year smuggling ancient artifacts from Iraq and Syria*, *Newsweek*, Aug. 7, 2017, <http://www.newsweek.com/isis-makes-100-million-year-smuggling-ancient-artifacts-iraq-and-syria-647524>; *ISIS generates \$100 m annually smuggling Syria, Iraq artifacts*, *Baghdad Post*, Aug. 08, 2017, <http://www.thebaghdadpost.com/EN/story/15382/ISIS-generates-100-m-annually-smuggling-Syria-Iraq-artifacts>.

⁵¹ *ISIS Makes Up To \$100 Million a Year Smuggling Ancient Artifacts from Iraq and Syria*, *What Really Happened*, Aug. 17, 2017, <http://www.whatreallyhappened.com/content/isis-makes-100-million-year-smuggling-ancient-artifacts-iraq-and-syria#axzz4zf125TK0> (reposting link to Paton, *supra* note 50).

⁵² Ruby Mellen, *ISIS Is Making Millions From The Art Market. Here's How Congress Wants To Stop That*, *The Huffington Post*, Nov. 4, 2015, https://www.huffingtonpost.com/entry/islamic-state-smuggling-bill_us_56324969e4b0c66bae5b5c4d.

particularly in Turkey, and noting that “[t]he profit derived by the Islamists from the illicit trade in antiquities and archaeological treasures is estimated at US \$150-200 million per year.”⁵³

This \$150-200 million figure was later reported in *Reuters*, *Business Insider* (noting that “many details in Churkin's letter appeared new”), *Foreign Policy*, *Sputnik*, *Russia Today*, and *The Daily Beast*, among others.⁵⁴

Some, including *Reuters*, *Cultural Heritage Lawyer* and *Business Insider* reported a healthy skepticism of Ambassador Churkin’s claims.⁵⁵ While Turkey eventually investigated Russia’s claims, a spokesperson nevertheless maintained that the claims were made for “political purposes and as propaganda,” in light of longstanding political tensions between Russia and Turkey.⁵⁶

...But Even this Lower Number is the Value of the Entire Antiquities Market

Importantly, International Association of Dealers in Ancient Art (IADAA) spokesman Ivan MacQuisten pointed out that Ambassador Churkin’s comments conveniently coincided with recently released statistics valuing the *entire* global market in all Mediterranean antiquities at \$150-200 million, with Syrian antiquities only representing 5 to 10 percent of the objects circulating in the art market both today and in decades past.⁵⁷ MacQuisten also pointed to

⁵³ Letter dated 31 March 2016 from the Permanent Representative of the Russian Federation to the United Nations addressed to the President of the Security Council, United Nations, Mar. 31, 2016 www.un.org/ga/search/view_doc.asp?symbol=S/2016/298.

⁵⁴ Louis Charbonneau, *Islamic State nets millions from antiquities: Russia*, Reuters, Apr. 6, 2016, <https://www.reuters.com/article/us-mideast-crisis-antiquities-russia/islamic-state-nets-millions-from-antiquities-russia-idUSKCN0X32HK>; Louis Charbonneau, Reuters, *Islamic State nets millions from antiquities*, Business Insider, Apr. 6, 2016, <http://www.businessinsider.com/r-islamic-state-nets-up-to-200-million-a-year-from-antiquities-russia-2016-4>; Robbie Gramer, *UNESCO Fights Back as ISIS Tries to Stamp Out Culture*, Foreign Policy, Apr. 12, 2017, <http://foreignpolicy.com/2017/04/12/unesco-united-nations-isis-islamic-state-cultural-antiquities-trade-irina-bokova-refugees-heritage/>; *History for Sale: Daesh Selling Looted Artifacts in Turkish Markets*, Sputnik News, Apr. 6, 2016, <https://sputniknews.com/middleeast/201604061037592176-un-syria-culture-smuggling/>; *Turkey's Gaziantep is main ISIS trade hub of antiques hauled in Syria & Iraq—Russian UN envoy*, Russia Today, Apr. 6, 2016, <https://www.rt.com/news/338705-turkey-syria-artifacts-trade-churkin/>; Barbie Latza Nadeau, *Italian Mob Trades Weapons for Looted Art from ISIS in Libya*, The Daily Beast (Oct. 18, 2016), <https://www.thedailybeast.com/italian-mob-trades-weapons-for-looted-art-from-isis-in-libya>. (Falsely reporting that the Churkin letter had been released in April 2015, when it was released March 31, 2016).

⁵⁵ Charbonneau (Reuters article), *supra* note 54; Rick St. Hilaire, *Russian Ambassador's Short Letter Makes Big Claims About Looted Syrian Antiquities*, Cultural Heritage Lawyer, Apr. 6, 2016, <http://culturalheritagelawyer.blogspot.com/2016/04/russian-ambassadors-short-letter-makes.html>. Charbonneau (*Business Insider* article), *supra* note 54.

⁵⁶ Reuters Staff, *Turkey investigating Russian claims on smuggles Syrian antiquities*, Reuters, Apr. 7, 2016, <https://www.reuters.com/article/us-mideast-crisis-antiquities-turkey/turkey-investigating-russian-claims-on-smuggled-syrian-antiquities-idUSKCN0X42K9>.

⁵⁷ *Is there a market for looted works in Syria and Iraq*, Art Media Agency, Apr. 24, 2016, <https://en.artmediaagency.com/118537/is-there-a-market-for-looted-works-in-syria-and-iraq/>.

documents acquired by U.S. Special Forces in the May 2015 raid of Abu Sayyaf's hiding place that demonstrated that the only primary source documents "put the figures at around \$4m a year and that includes money from mineral and metal extraction."⁵⁸

Misstatements about the Abu Sayyaf Raid

Hard evidence of ISIS's illicit antiquities trade is hard to come by—only *one* documented 2015 raid had given *any* demonstrable evidence of ISIS's antiquities revenue. This revenue, over a six-month period (at ISIS's height), appeared to be between 1.25 and 1.35 million dollars.

On May 15, 2015, a U.S. Special Operations team killed ISIS commander and reported financial officer Abu Sayyaf (real name Fathi Ben Awn Ben Jildi Murad al-Tunisi), in a raid in a small village in Syria. The team seized a trove of documents—and a cache of primarily no-to-low value antiquities such as terra cotta fragments, but including gold coins and an ivory plaque reportedly looted from the Mosul Museum. The raid also captured a receipt book that contained eight receipts dated between November 2014 and May 2015. The documents detailed ISIS's different revenue streams, ranging from pillaged oil and natural gas to pillaged antiquities.⁵⁹

One particular document was widely cited because it indicated that Abu Sayyaf was charged with handling antiquities and showed that he had collected \$265,000 in taxes on looted antiquities during his six-month tenure.⁶⁰ With a 20% tax rate, the total value of the looted antiquities was calculated to be around \$1.25 million by *Gates of Nineveh* (Sept. 2015), the Antiquities Coalition (April 2016), and the State Department.⁶¹ Other sources, like *The Daily Beast* calculated an even larger sum of more than \$1.3 million.⁶²

⁵⁸ ATG Reporter, *Russian claims of ISIS profits from looted antiquities 'do not add up,' dealer body says*, Antiques Trade Gazette, Apr. 8, 2016, <https://www.antiquestradegazette.com/news/2016/doubt-over-isis-sales-of-looted-items/>.

⁵⁹ Jonathan Landay, Warren Strobel, Phil Stewart, *Exclusive: Seized documents reveal Islamic State's Department of 'War Spoils'*, Reuters, Dec. 28, 2015, <http://www.reuters.com/article/us-usa-islamic-state-documents-group-exc/exclusive-seized-documents-reveal-islamic-states-department-of-war-spoils-idUSKBN0UB0AW20151228>.

⁶⁰ *Id.*; Ben Taub, *The Real Value of the ISIS Antiquities Trade*, The New Yorker, Dec. 4, 2015, <https://www.newyorker.com/news/news-desk/the-real-value-of-the-isis-antiquities-trade>.

⁶¹ Christopher Jones, *How Much Money is ISIS Making from Antiquities Looting*, Gates of Nineveh, Jan. 12, 2016, <https://gatesofnineveh.wordpress.com/2016/01/12/how-much-money-is-isis-making-from-antiquities-looting/>; Tia Rinehart, *Experts urge stop to ISIS funding through stolen artifacts*, Antiquities Coalition, Apr. 7, 2016, <https://theantiquitiescoalition.org/ac-news/experts-urge-stop-to-isis-funding-through-stolen-artifacts/>. (Also cited in #CultureUnderThreat Report, *supra* note 19); Andrew Keller, *Documenting ISIL's Antiquities Trafficking: The Looting and Destruction of Iraqi and Syrian Cultural Heritage: What We Know and What Can Be Done*, United States Department of State, Sept. 29, 2015, <https://2009-2017.state.gov/e/eb/rls/rm/2015/247610.htm>.

⁶² Christopher Dickey, *ISIS Raid Netted Stolen Treasure Trove of Ancient Artifacts*, The Daily Beast, Sept. 30, 2015, <https://www.thedailybeast.com/isis-raid-netted-stolen-treasure-trove-of-ancient-artifacts>.

The documents found during the Abu Sayyaf raid were immediately heralded as incontrovertible proof that ISIS is “leverag[ing] antiquities to finance its operations,”⁶³ and “heavily involved in antiquities trafficking.”⁶⁴ Abu Sayyaf began to be described as ISIS’s “top antiquities dealer”⁶⁵—when in reality, Abu Sayyaf was the apparent Minister of Natural Resources, with the antiquities unit only a division of his Ministry’s operations—at least for the six months he was in power.

Later, however, in September 2015, the U.S. officials and the United Nations presented declassified documents detailing ISIS’s network of antiquities looting.⁶⁶ The documents released, including three of the eight receipts found in the raid, only accounted for about \$24,000 in taxes, which was “[l]ess than a tenth of what was reported in the overall amount.”⁶⁷ In fact, Ben Taub of *The New Yorker* ultimately concluded that either Abu Sayyaf was a “lousy accountant” or that “[t]he documents proved that ISIS maintains a “marginally profitable ‘antiquities division,’”⁶⁸ contradicting other accounts that the receipts showed “[Abu Sayyaf] to be a careful record keeper. Treasury officials told us transactions totaled hundreds of millions of dollars.”⁶⁹

To support his position that ISIS’s antiquities trade was minimal, Taub cited antiquities dealers’ assessment of the lack of commercial value of the antiquities found at Abu Sayyaf’s hideout—as well as the unsellable nature of items *known* to be looted from historic sites like Palmyra. Taub also pointed out that ISIS-issued documents actually *condemned* the trade of “idolatrous antiquities and ephemeral statues.”

Dutch National Study Contradicts the Media

Others, such as archaeologist-criminologist Donna Yates have characterized the claim that ISIS is making millions on the sale of illicit antiquities as “silly high” and uncorroborated by any hard proof.⁷⁰

⁶³ Matthew Twombly and Chiqui Esteban, *Looting and Conflict: The ISIS Antiquities Pipeline*, National Geographic, June 2016, <https://www.nationalgeographic.com/magazine/2016/06/looting-isis-antiquities-pipeline/>.

⁶⁴ Christopher Jones, *New Documents Prove ISIS Heavily Involved in Antiquities Trafficking*, Gates of Nineveh, Sept. 30, 2015, <https://gatesofnineveh.wordpress.com/2015/09/30/new-documents-prove-isis-heavily-involved-in-antiquities-trafficking/>.

⁶⁵ Brennan, *supra* note 46.

⁶⁶ Keller, *supra* note 61.

⁶⁷ Taub, *supra* note 60.

⁶⁸ *Id.*

⁶⁹ Brennan, *supra* note 46.

⁷⁰ *Is there significant evidence of paramilitary funding from the illicit antiquities trade? Yes.*, Conflict Antiquities, June 21, 2014, <https://conflictantiquities.wordpress.com/2014/06/21/illicit-antiquities-trade-paramilitary-funding-evidence/>.

The widely disseminated high financial figures were also recently contradicted when the Dutch National Police released a 78-page report in September 2016 that ultimately found that while evidence does show the *existence* of an illicit trade of antiquities by ISIS, “evidence for large-scale operations is not found” and “this evidence does not add up to the revenue estimates mentioned in the media or policy papers.”⁷¹

The Dutch National Police’s study examined government reports and contacted customs authorities and law enforcement agencies, neither of which reported the massive influxes of illicit cultural property that would justify the “millions” in revenue that ISIS has been said to receive.

The study also points to the University of Chicago’s Modeling the Antiquities Trade in Iraq and Syria (MANTIS) Program (supported by the Antiquities Coalition),⁷² that monitors satellite images of Syria and Iraq to track trafficked artifacts, and which found in preliminary reports that ISIS was likely to have only earned around \$4 million in profits in total—which was a “far cry from the \$7 billion” initially reported.⁷³ Why, though? According to the MANTIS team leader Dr. Fiona Rose-Greenland, “[i]t’s a lot easier to call for action against a \$7 billion crime than a \$4 million one.”

Conclusion

When the United States offers a \$5 million reward for information on ISIS’s antiquities trade in the US⁷⁴ – a reward which has not been claimed since it was offered in 2015 – and primary documents and evidence from research show that the entire market could be worth far less than that, it raises serious questions about whether US and European government resources should be focused on this one facet of ISIS’s terrorist regime, when other, more lucrative sources of revenue are ignored. Even more importantly, for the sake of the museums whose mission is to preserve art for many generations into the future, for the sake of the public-spirited collectors who support them, and for the sake of the legitimate trade in antiquities that has circulated works of global heritage for hundreds of years, government policy should be based upon facts, not falsehoods.

⁷¹ Tim van Lit, *Cultural Property, War crimes and Islamic State* at 6 (Dutch National Police, Sept. 2016) <http://iadaa.org/wp-content/uploads/2016/05/Cultural-Property-War-crimes-and-Islamic-State-2016.pdf>.

⁷² *Modeling the Antiquities Trade in Iraq and Syria (MANTIS)*, University of Chicago, <https://oi.uchicago.edu/research/projects/mantis>;

⁷³ Rose-Greenland, *supra* note 13.

⁷⁴ Rebecca Kheel, *US offers \$5 million reward to stop ISIS from plundering antiquities*, The Hill, Sept. 30, 2015, <http://thehill.com/policy/defense/255442-us-offers-5-million-reward-to-stop-isis-from-plundering-antiquities>.

