Journal of Crime and Justice, 2014
Vol. 37, No. 3, 399–421, http://dx.doi.org/10.1080/0735648X.2013.819785

Museum malpractice as corporate crime? The case of the J. Paul Getty Museum

Neil Brodie[a] and Blythe Bowman Proulx[b]*

[a]*Scottish Centre for Crime & Justice Research, School of Social and Political Sciences, University of Glasgow, Glasgow, UK;* [b]*Criminal Justice, L. Douglas Wilder School of Government & Public Affairs, Virginia Commonwealth University, Richmond, VA, USA*

(*Received 19 March 2013; final version received 23 June 2013*)

Within a corporate criminological framework, this paper examines the antiquities acquisition policies and activities of the J. Paul Getty Museum particularly during the curatorship of Marion True, whose indictment by the Italian government was part of a broader investigation into the trade of illicitly obtained Italian antiquities. Specifically, we employ two theoretical perspectives – that of differential association and anomie – to examine malpractice among Getty officers and suggest that both museum cultures and the psychology of collecting may in fact be criminogenic. In light of such criminological insight, we conclude the paper with suggestions for broad reforms of museum governance.

Keywords: corporate crime; antiquities; museum governance; collecting; anomie; differential association

Introduction

The US art museums' community was shocked when on 16 November 2005, Marion True appeared before a criminal court in Rome, Italy, to face charges of receiving stolen antiquities, trafficking, and conspiracy to traffic (Lufkin 2005). From 30 April 1986 until 1 October 2005, True had been Curator of Antiquities at the J. Paul Getty Museum, which was, at the time, the wealthiest collecting institution in the United States with an endowment in the mid 1980s of several billion dollars (Felch and Frammolino 2011, 54). On 13 October 2010, the trial ended without resolution when the limitation period on all charges expired. True, who had been forced to resign from the Getty in 2005 for reasons seemingly unconnected to the case, was left unemployed and protesting that she had been neither condemned nor vindicated (Eakin 2010; True 2011). She also complained that she felt she had been singled out unfairly for prosecution, and for the Getty, expressed 'nothing but the greatest contempt for them in the world' as its senior staff had very visibly failed to rally to her defense (quoted in Eakin 2010, para 10).

The Italian government's criminal indictment of Marion True was part of a broader investigation into the trade of illicitly obtained Italian antiquities. But was True in fact simply a scapegoat, an accessible and tangible target for the Getty's broader questionable acquisition practices and governance? In this paper, within a corporate criminological framework, we examine the Getty's acquisition activities and policies both during and beyond the curatorship of Marion True and suggest that both museum cultures and collecting psychology may be criminogenic. In light of this, we conclude the paper with

*Corresponding author. Email: bbproulx@vcu.edu

several suggestions for regulatory reform that may better address the more fundamental causes of museum malpractice.

Background

Art museum acquisition of trafficked antiquities was a commonly accepted practice in the twentieth century and perhaps still is.[1] The traffic persisted despite accumulating and often graphic evidence of the material damage to archaeological sites and monuments and sociocultural harm it causes (Brodie, Doole, and Watson 2000; Renfrew 2000; Waxman 2008; Manacorda and Chappell 2011). It also survived evolving legal and ethical resistance to museums' involvement with antiquities trafficking marked by UNESCO's adoption in 1970 of the Convention on the Means of Prohibiting and Preventing the Illicit Import, Export and Transfer of Ownership of Cultural Property, and energetic work by the International Council of Museums (ICOM) in highlighting the dangers of unrestricted antiquities collecting.[2] Although many archaeologically rich 'source countries,' including Italy, have vested undiscovered antiquities into state ownership by means of so-called patrimony laws (in Italy's case, such legislation was enacted only in 1939), it was convenient for museums to regard their acquisition of antiquities excavated and exported illegally in violation of these foreign patrimony laws as legal and therefore acceptable under US law, and responsible museum officers justified their disregard of foreign laws in the belief that the museum collection and display of what they regarded as important works of art were in the public benefit.[3]

The idea that US museums might be excepted from the legal constraints of foreign patrimony laws was dispelled in 1979 by the *McClain*[4] decision when a US appellate court affirmed the 1977 conviction[5] of several US dealers for conspiring to sell antiquities stolen from Mexico, considered state property under a Mexican patrimony law of 1972, and thus designated by the court as stolen property for the purposes of the National Stolen Property Act (NSPA) (Gerstenblith 2003a, 2009; Urice 2010). On appeal, Mexico's patrimony law was upheld, the court confirming that the NSPA recognized ownership created by foreign legislation. This recognition of a foreign patrimony law by US federal courts presented a direct challenge to museums, though one that at the time went largely unheeded.[6] Figure 1 below, for example, shows that the Getty continued to acquire trafficked antiquities for many years afterwards, and the Getty was not alone:

The indictment of Marion True arose out of a larger investigation conducted by the Italian Carabinieri[7] into the illicit trade of Italian antiquities. By 2012, this investigation had resulted in the trial and conviction of several Italian nationals including dealers Giacomo Medici and Gianfranco Becchina, who between them had been the ultimate source of many Getty acquisitions; as well as the indictments of True and of US antiquities dealer Robert Hecht[8] (Watson and Todeschini 2007; Isman 2009). Documentary and photographic evidence gathered established that many antiquities acquired from 1970 onwards by several US art museums, including some of their most prized exhibits, had been illegally excavated in Italy and exported, and ultimately caused their deaccession and return. Between 1999 and 2007, the Getty returned 46 pieces (Lee 1999; Getty 2005, 2007), and a further single piece in 2013 shown by its own research to have been looted in the 1970s (Getty 2013). In 2012, it initiated an internal investigation into the provenances of 45,000 pieces in its collection (Felch 2013). As of 2013, the process of discovery and return at other museums was ongoing. Deaccessions and returns caused by the Italian investigations include 13 pieces from the Boston Museum of Fine Arts in 2006 (Boston 2006), 20 pieces from New York's Metropolitan Museum of Art also in 2006 (Metropolitan 2006), 15 pieces from the Princeton University Art Museum in 2007 (Princeton 2007), 14 pieces from the Cleveland

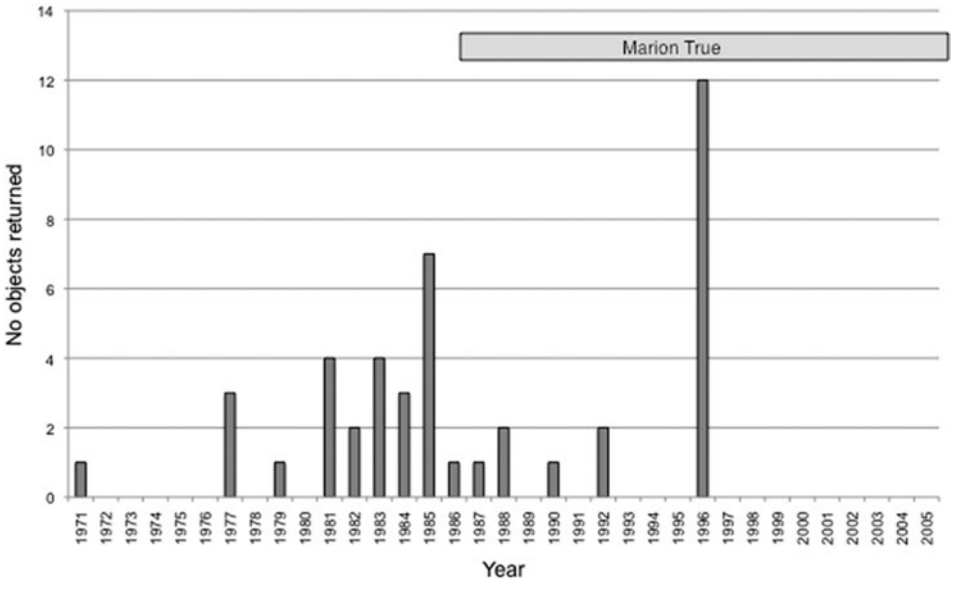

Figure 1. Histogram showing years of accession of objects returned to Italy between 1999 and 2007. Gray horizontal bar marks period of Marion True's tenure as Curator of Antiquities.

Art Museum in 2008 (Cleveland 2008), 5 pieces from the Dallas Museum of Art in 2012 (Dallas 2012) and one piece from the Toledo Museum of Art in 2013 (ICE 2013).

Once her trial had ended, True felt free to speak out in her own defense. She pointed to three circumstances which she claimed absolved her from sole responsibility for any potential wrongdoing (True 2008, 2011; Eakin 2010):

1. Although she had been charged with receiving antiquities, she had never personally received or taken possession of a single object that had been held as evidence against her, nor had she profited financially from their acquisition. All the antiquities in question had been acquired for and were the property of the Getty Museum.
2. All antiquities acquired by the Getty during her tenure as Curator of Antiquities had been done so with the approval of the Getty's Board of Trustees, its CEO, in-house counsel, Director, and Deputy Director. She was not acting in isolation.
3. She had not even been Curator of Antiquities when many of the pieces returned to Italy had been acquired.

In other words, True wanted it to be known that over a prolonged period of time Getty officers had acted collectively as a corporate body in acquiring trafficked antiquities for the material benefit of the Getty Museum.

True's claims are all factually correct. First, it is a matter of public record that antiquities shown to have been stolen were returned to Italy from the possession of the Getty (Lee 1999; Getty 2005, 2007). Second, there is no evidence to suggest that True was acting as a 'rogue curator' (Felch and Frammolino 2011, 218). While potential acquisitions might have been identified by True, any actual decision to acquire was reached collectively, as she herself has stated, and as was recognized internally by some of the trustees in 2002 (Felch and Frammolino 2011, 241, 249). Finally, True was appointed as Curator of Antiquities in 1986, but antiquities subsequently identified as stolen in the Getty's possession had been acquired over a period of time that stretched back to 1971 (Figure 1).

If the factual evidence showed that True was not solely and personally responsible for the Getty's questionable acquisition practices, why would Italian authorities choose to pursue her with criminal prosecution in 2000? True believed that the Italian prosecutors had singled her out in an attempt to 'intimidate the entire American art world' (quoted in Eakin 2010, para 8), and it is a view that enjoys some sympathy among her erstwhile museum colleagues (Felch and Frammolino 2011, 260). Michael Brand, for example, who was director of the Getty Museum from January 2006 until January 2010, believes she was a scapegoat for 'a much broader problem that affects many institutions' (Fortescue 2012). True notes that the charge of criminal conspiracy made against her extended to 'an undefined number of "unindicted co-conspirators" which included antiquities dealers and collectors as well as many scholars and curators' (True 2011, para 11). At the commencement of her trial in 2005, a senior member of the Italian prosecutorial team stated his belief that the Getty Trust was 'jointly liable' for the damage caused to Italian cultural heritage by its acquisition practices (Lufkin 2005). Put together, these observations suggest that True was targeted for criminal prosecution because she was in effect a singular and accessible expression of the less tangible, collective entity of museum corporate governance, comprised in her case of the Getty Trust and its appointed officers.

The malpractice of the Getty and other museums in acquiring stolen antiquities has been characterized as ethical misconduct (Eakin 2007, para 22), and reaction within the museums' community aimed at deterring such ethically aberrant behavior has focused on the formulation of detailed 'acquisitions policies' – sets of sometimes but not always published guidelines itemizing recommended diligence procedures that should be followed when investigating the provenance of a proposed acquisition.[9] The trial of Marion True, however, and her defense of collective responsibility, suggests that the Getty's involvement in the antiquities trade could just as well be considered as an example of white-collar or, more specifically, corporate crime.[10]

At first glance, the worlds of white-collar corporate crime and art museums have little in common. The former, after all, conjures images of Martha Stewart, sentenced in 2004 to federal prison for insider stock trading, while the latter evokes visions of elite galleries adorned with paintings, sculptures, and other *objets d'art*. While greed, money, and financial gain are the most oft-cited motives for corporate criminality (Bucy et al. 2008), an art museum's sense of purpose instead centers on the preservation and diffusion of art and knowledge – collecting and safeguarding objects of artistic and cultural importance and enabling people to engage with them for purposes of 'inspiration, learning, and enjoyment' (Museums Association 2012). While the corporate criminal appears fundamentally self-interested, the art museum seems essentially selfless. Yet there is an important area of common ground that the two enterprises share. Money and financial gain are not always the primary motivations for corporate criminal conduct (c.f., for example, Bhattacharya and Marshall 2011); rather, ethical and legal shortcuts are sometimes taken in the business world in order to meet competitive business mandates (Bucy et al. 2008) – much like shortcuts taken at the Getty to meet collecting mandates as our discussion will show. As Mackenzie notes for museums, they:

> … have a special, and central, place in the cultural field. In western countries they are in many ways the antithesis to the blunt, crass swathe cut by the corporate world, but notably they practice a similar code – accumulation in a competitive marketplace – while being attributed and presenting an image of public service, educative value, cultural preservation, intellectual stimulation and genteel whimsy (Mackenzie 2011a, 139).

'Accumulation in a competitive marketplace,' then, is a mission or practice that distinguishes both business corporations and museums and provides them with a common denominator.

As far as we are aware, this is the first time that the compass of corporate crime has been extended to include museum malpractice, and we hope this paper will help to suggest some innovative remedies for museum governance. By examining the acquisition practices of the Getty Museum from the perspective of corporate crime, we show how a criminological analysis can help clarify the relationship between a US art museum and the illicit trade in antiquities. We identify features of museum governance and practice that can be construed as conducive to criminal or otherwise deviant behavior, and, in light of this criminological groundwork, make policy recommendations for museums that would seek to encourage law-abiding behavior and avoid malpractice among its officers.

The intersection of art, crime, and the Getty

If, as True claimed, responsibility for the alleged criminal acts of acquiring trafficked antiquities diffused through the Getty organization, the beneficiary was also the 'organization,' in the material shape of the museum. The benefit could be defined financially, in terms of increased visitor numbers, though that would probably miss the point. The sought-after outcome was to enhance the intangible quality of institutional prestige. The Getty was already financially well-endowed, but it was locked in open competition with other US collecting institutions with the aim of assembling the country's premier antiquities collection:

> Walsh [John Walsh, Getty Museum Director 1983–2000] and True both knew that the Getty's antiquities collection had the best chance of setting the museum apart as one of the country's best cultural institutions. But to reach that goal, the Getty had to fill some big holes in its collection. In particular, the collection needed to find several major statues from the archaic and classical periods – objects that had rarely come onto the market in recent decades (Felch and Frammolino 2011, 50–1).

It was to achieve this end that acquisitions of doubtful provenance were made that would enhance the museum's prestige; the Morgantina Aphrodite (Cult Statue of a Goddess), for example, a seven-and-a-half feet high limestone and marble statue of a goddess bought by the Getty in 1988 for $18 million, was seen at the time of its acquisition to be exactly the kind of piece that would 'instantly catapult the museum into the top ranks of world cultural institutions....' (Felch and Frammolino 2011, 86).[11] The Aphrodite was subsequently deemed stolen and returned to Italy in 2007 (Getty 2007). Questions concerning provenance that were raised at the time of its acquisition had been ignored in the rush to acquire.

Yet intangible as institutional prestige might be, it came packaged with more concrete benefits for some of the Getty officers concerned. Bourdieu's (1986) discussion of the disinterested and immaterial accumulation of social and cultural capital and their interconvertibility with economic capital is important here. While expenditure of Getty money on spectacular antiquities was intended to enhance the national and international standing of the Getty Museum, indirectly its officers profited too through the entry it afforded them into elite social circles and enjoyment of the associated 'jet-set' lifestyles that their connection with the Getty Museum and its money allowed (and perhaps even demanded [Eakin 2007, para 28]). Marion True, for example, found herself in the company of millionaires on the exclusive Greek island of Schinoussa. Talking of British antiquities dealer Robin Symes and his Greek partner Christos Michaelides, she said:

> They owned a peninsula. When you arrived, the peninsula would have two or three giant yachts tied up. And all of a sudden there would be 15 or 20 people. At first, everyone would be standing around having cocktails, laughing, telling whatever news there was to tell. Then everyone went to different tables for dinner. After dinner, there might be dancing, there might be music. It was just a jolly evening … I have to say, I enjoyed it, I enjoyed these people (Eakin 2007, para 29).[12]

The return to Italy by the Getty between 1999 and 2007 of 46 antiquities shown to have been stolen from documented collections or illegally excavated and exported (and valued in total at more than $17 million),[13] demonstrates conclusively that the Getty was in receipt of stolen material, but it is harder to establish the knowledgability of its responsible officers. Were they simply negligent as regards their due diligence, or naïve about the workings of the antiquities market – innocent victims perhaps of sophisticated though criminal dealers? Or were they guilty of deliberately ignoring evidence of bad title or intentionally derelict in their duty to establish good title? In short, is it likely that Getty upper management approved for acquisition material that they knew had definitely or most likely been trafficked, and that therefore could be construed as stolen under Italian and US law?

In 2001, documents collected by Getty lawyers during an internal review into museum acquisitions were made available to the *Los Angeles Times* (Felch and Frammolino 2005, 2011, 195–205). The information contained in these documents suggests that the Getty was acquiring antiquities in the knowledge that some of them at least were likely to have been trafficked. Most prominently, there is the so-called 'smoking-gun' (Eakin 2011; Felch and Frammolino 2011, 66–67, 248), a memo written in October 1985 by True's predecessor Arthur Houghton to Deputy-Director Deborah Gribbon reporting that three marble objects the museum had obtained earlier that year in February 1985 from collector Maurice Tempelsman had been excavated illegally in Italy in 1976 or 1977 (and, therefore, after the 1939 date of the relevant patrimony law), and had passed through the hands of Italian dealer Medici, allegedly known within the Getty as 'a low-level Italian gangster' (Felch and Frammolino 2011, 66), yet with whom the Getty was still doing business (Felch and Frammolino 2005, 2011, 66–67, 248), and on to Hecht and Symes. In the Getty's defense, the 'smoking-gun' memo is not as incriminating as it first appears to be, as it establishes that at the time of acquisition of the three marble objects the Getty may have suspected but did not possess 'certain knowledge' of theft. Certain knowledge came only a few months after acquisition with the reply to Houghton's query, though at that point the Getty took no action to return the material to Italy voluntarily. Gribbon later defended this decision by saying that the information contained in the memo was 'unverified,' claiming also that patrimony laws were 'little known and seldom enforced' at the time (Felch and Frammolino 2005). This latter claim, however – that patrimony laws were little known – is demonstrably wrong. An internal Getty memo dated 3 April 1984 from Houghton to Walsh entitled, 'Acquisitions I: US Customs, the *McClain* Decision and the National Stolen Property Act' states Houghton's understanding that '… *McClain* stipulates that after a properly specific legislative declaration of ownership by a foreign state, the illegal exportation of material covered by the declarations constitutes theft under the provisions of the National Stolen Property Act (NSPA).' The memo also states Houghton's belief that no action would be taken against the importer 'unless it is clear that the importer acted with certain knowledge that the material had been illegally exported from a country which had appropriate national ownership in place' (Houghton 1984).[14]

Thus by 1984, at the latest, the Getty was fully aware that the acquisition of antiquities known to have been exported illegally from Italy after 1939 would constitute a criminal

offense under both Italian and US law. By 1985, it was also aware that it was acquiring trafficked antiquities from dealers that it knew to be vending stolen material. More was to follow. In a 1986 meeting held to discuss the acquisition of the Getty Kouros, a six-and-a-half-feet high marble statue appearing to date from sixth-century Greece,[15] Walsh is quoted as saying that 'It appears to me that the Kouros was found recently, most likely in South Italy. Whoever found it gave it to Becchina,[16] who has now sold it to us' (Felch and Frammolino 2011, 71). In his 1986 letter of resignation, Houghton accused Walsh of choosing a 'path of self-enforced ignorance of fact' as regards the Kouros acquisition (Felch and Frammolino 2011, 71–72). Of Symes, the antiquities dealer who would later entertain True on Schinoussa and from whom the Getty had purchased several pieces, at a September 1987 meeting with Walsh, CEO Harold Williams said simply, 'We know Symes is a fence' (Felch and Frammolino 2011, 89, 218). Williams later claimed he had been speaking 'hypothetically' (Eakin 2011; Felch and Frammolino 2011, 335, note 89), and in 1988 the Getty had gone on to pay Symes $18 million for the Morgantina Aphrodite (Frammolino and Felch 2007). At a second meeting in September 1987, convened to discuss a new acquisitions policy, Walsh noted Williams saying that the museum officers 'knowingly buy stolen goods' and that they 'knowingly deal with liars by accepting their warranties' (Felch and Frammolino 2011, 218). Again, though, he has said since that he was setting out a hypothetical situation to frame the formulation of the new policy (Felch and Frammolino 2005). In a 2004 deposition to the Italian prosecutorial team, Walsh is quoted as saying that 'From the beginning, we knew that there was the potential of being offered material that had been illegally excavated, or illegally removed from Greece or Turkey or Italy … This was a common problem. Everybody knew it in 1983; everybody knows it now' (Felch and Frammolino 2006).

It was in this context of understanding, and in the midst of negotiations to obtain the Morgantina Aphrodite, which exhibited obvious scars of recent looting (Felch and Frammolino 2011, 218), that the Getty changed its acquisition policy from one that prohibited purchases of items 'suspected of being illegally exported' to a policy that, among other things, would allow the museum to purchase suspect antiquities (Felch and Frammolino 2011, 88). Acting Curator of Antiquities Houghton had devised an approach he termed 'optical due diligence,' intended to give the appearance of due diligence while at the same time avoiding certain knowledge of illicit trade that would either prevent the acquisition of a desired object or open the Getty to charges of receiving stolen property (Felch and Frammolino 2011, 61). Houghton resigned in April 1986 and was replaced by True, but the new antiquities acquisitions policy of November 1987 implemented his idea. First, the museum would obtain guarantees from vendors that the objects had been legally excavated and exported. Second, the museum would notify possible countries of origin of a piece prior to its acquisition, and would only proceed if no evidence of theft or illicit trade was received in response. Finally, the museum would publish all acquisitions, and if evidence emerged that the piece had been recently looted, it would be returned to its rightful owner (True 1997, 139–40; Felch and Frammolino 2011, 90). This policy might be characterized as encapsulating the principle of 'innocent until proven guilty' in that the Getty would presume an object was on the market legitimately unless it could be proven otherwise by an authority outside the Getty.[17] It was clearly inappropriate in circumstances where guarantees of legal trade and ownership were known to be forged and most antiquities were illegally excavated and traded clandestinely, so that it would be unlikely for authorities in countries of origin to have knowledge of theft or trafficking.[18] What the new policy did in effect – deliberately or not – was to facilitate the Getty's continued purchasing of trafficked antiquities.[19]

Thus the evidence strongly suggests that Getty officers were aware that the Getty was acquiring trafficked antiquities, and that there was a certain level of corporate acceptance and even approval of such practice. There is nothing to suggest that the 1987 policy changed anything in that respect. In 1991, for example, Medici was contacted again by the Getty, when in response to a query from True he revealed that three pottery fragments in Getty's collection had been found (illegally) in the ancient Etruscan cemetery of Cerveteri. Similarly, an (undated) letter from Hecht (who worked with Medici) to True drew her attention to a vase subject to Italian police investigations, and yet the Getty subsequently acquired it (Felch and Frammolino 2005). To this end, it is notable too that after the collapse of her trial, True did not issue a clear denial of Getty malpractice as regards the acquisition of stolen antiquities. Perhaps she did not feel compelled to do so, as she was, understandably in the circumstances, focused upon clearing her own name. Nevertheless, she questioned the political motivations of the Italian prosecutors, complained about the lack of support from her museum colleagues, expressed her sense of injustice that she had been singled out for prosecution despite her record of improving Getty acquisition policies and practices, and maintained that as regards the approval of acquisitions she had not possessed the sole determining voice. At no point, however, did she state categorically that Getty officers had never approved for acquisition antiquities that they knew to be illicit (Eakin 2007, 2010; True 2011).

Singling out Marion True?

In 2005, True was indicted in Italy on two primary charges – receipt of stolen antiquities and conspiracy with dealers Hecht and Medici to traffic antiquities (Brodie 2012). Yet, while serving as Curator of Antiquities, True never personally received any of the disputed antiquities, which were acquired – some before she even began her curatorship – by the Getty, with the blessings of its responsible officers (True 2011). But despite evidence suggesting that True was not solely and personally responsible for the Getty's questionable acquisition practices, and the fact that there was evidence of corporate criminality, the Italian authorities chose to pursue True individually with criminal prosecution instead of the pursuing the Getty as an institution for criminal corporate liability. As suggested above, the prosecutors' focus on True as an individual rather than the Getty as an institution may simply have been a more practical legal channel through which, at least indirectly, to challenge museum corporate governance. In any event, the Getty failed publicly to rally to her defense.

Bucy et al. (2008, 420–421) suggest that corporations facing potential prosecution may take several steps to minimize exposure, including full cooperation with the prosecuting authority, identifying and separating culpable individuals to distinguish them from the institutional entity, and demonstrating internal efforts to correct the illicit conduct. It is debatable as to whether the Getty cooperated fully with Italy, at first at least, though an improved acquisitions policy in 2006 is evidence of a demonstrable effort to correct corporate misconduct.[20] The question as to whether the Getty singled out True as a culpable individual, however, remains unanswered, though to True certainly it had done so. For example, in an interview in 2010 after the Italian criminal case against her had expired, she expressed resentment at what she perceived as being made the 'fall guy' for the Getty's malpractice:

> They acted like I ran the place. Above me I had a chief curator who was deputy director, a director, an in-house counsel, a president, a board of trustees to whom the president reported, and a chairman of the board. What about the lawyers who drafted the acquisition policy, who were supposed to be vetting all documents? They were perfectly happy to assure all that [the

> alleged acquisition of illegal art] was my work. Never once have John Walsh or Deborah Gribbon stepped forward to say one word about their responsibility (True, quoted in Eakin 2007, para 11).

Here, True shifts blame from herself and distributes it among other top Getty officials, suggesting that her colleagues had been content to let her serve as scapegoat for the broader and more ingrained pattern of institutional misconduct. Worse was to follow. As Italian prosecutors ramped up their investigation of True, the Getty cast her adrift. She had obtained a loan in Greece in 1995 through the mediation of Christos Michaelides to finance the purchase of a holiday home on the Greek island of Paros (Felch and Frammolino 2011, 138). Michaelides was a business partner of antiquities dealer Symes, with whom the Getty did business, and in October 2005 True was asked to resign for violating Getty conflict-of-interest rules by failing to report the loan (Felch and Frammolino 2011, 266). In fact, the Getty had known about the loan as early as 2002 (Felch and Frammolino 2011, 221–222), and in her defense True claimed that Michaelides had been acting only as an intermediary, and that in any case she had repaid the loan in 1996 (Frammolino and Felch 2005; Eakin 2011). She believes that for the Getty the loan was a convenient excuse to scapegoat her before the trial in Rome began (Eakin 2007). In a letter written to the Trust in December 2006, she complained that the Getty had not publicly defended her innocence, that the November 2005 return of three antiquities while she was still on trial was an implicit admission that they were stolen and therefore of her guilt, and that she had been left to 'carry the burden' for the Trust's actions and complained of its 'calculated silence' (Felch and Frammolino 2006, 2011, 291). Getty donor and trustee from 2000 to 2005 (and personal friend of True) Barbara Fleischman said in a letter to the Trust announcing her resignation, 'Shockingly, True became the prosecutor's stand-in for John Walsh, her superior, and the Trust. She has been wrongly accused and endured almost 5 years of battering' (Felch and Frammolino 2006, para. 3). Others in the museums profession were not so sure (Felch and Frammolino 2011, 266).

Scapegoating is fairly common in corporate criminal cases. For example, when Kweku Adoboli, an investment banker with UBS, was charged with two counts of fraud and two counts of false accounting his boss, Ron Greenidge, was fired (Levin 2012). While UBS cited the reason for his dismissal as 'gross misconduct' over his supervision of Adoboli's trading activity, Greenidge insisted that he had never received any warnings about the risk of any of Adoboli's trades, and that instead bank had chosen simply to make Greenidge a scapegoat while Adoboli went on trial (Fortado and Moshinsky 2012; Rowley 2012). In similar fashion, it has been claimed that some pharmaceutical companies retain a 'vice-president responsible for going to jail' to inhibit the spread of investigations into alleged corporate criminality (Slapper and Tombs, 1999, 126). In True's case, the Getty Trust and its officers were aware of the risks that the museum's policy of acquiring unprovenanced and trafficked antiquities entailed, but failed to make their collective responsibility public in support of True after her indictment, creating the impression that True had acted alone without institutional approval or consent. Thus although there is not much evidence to suggest that the Getty Trust took a considered and deliberate decision to publicly scapegoat True, the effect of its inaction was to all intents and purposes the same – criminal investigation of Getty malpractice stopped short at True.

A criminogenic museum culture?

Two theoretical perspectives seem appropriate for explaining the surprising tolerance of the Getty's institutional culture toward wrongdoing on the part of its officers. First, there is

the theory of differential association (Sutherland 1983; Piquero, Tibbetts, and Blankenship 2005). Corporate (in this case museum) culture exerts a powerful malign influence upon the behavior of individuals, encouraging deviant practice within the organization that would not be tolerated in a non-workplace environment. It is well documented that some organizations condone law-violating behavior if it is beneficial to the organization, thereby fostering a habit of deviant conduct that is learned alongside other organizational practices (c.f., for example, Hughes 1962; Clinard and Yeager 1980; Reiss and Biderman 1980; Sutherland 1983; Braithwaite 1989). For example, when Walt Pavlo, a credit collections manager at MCI, was convicted on charges of obstruction of justice, money laundering, and mail fraud, he claimed that he learned how to hide millions of dollars in unpaid debt by none other than his colleagues at MCI (Weinberg 2010). In fact, at the time when Pavlo began engaging in fraudulent activity at the company, 'since everyone around him appeared to be acting unethically, he thought his fraudulent accounting of bad debt and theft of MCI's money would never be discovered' (Bucy et al. 2008, 408). In similar fashion, True has been quoted as saying that during her training at the Getty, 'There was a kind of etiquette I absorbed. The issue of "Where did you get this?" Was not discussed' (Eakin 2007, para 16).

Anomie theory offers a second perspective, stressing that a disjuncture between corporate goals and the means available for achieving those goals encourages deviant behavior (Passas 1990; Passas and Agnew 1997). In the Getty's case, the institutional goal of establishing a world-class antiquities collection was completely beyond the means available, which comprised a legal antiquities market of largely unprepossessing pieces. It is clear from documents that Getty officers were aware of the realities facing them. Houghton is quoted as having said in 1984 that 'The reality is that 95% of the antiquities on the market have been found in the last 3 years' (Felch and Frammolino 2011, 61), and Williams similarly, '90% of the objects on the market are presumed to have recently come out of Italy or Greece' (Felch and Frammolino 2011, 58). In such circumstances, an aggressive collecting museum such as the Getty would have little choice other than to acquire trafficked objects. A former officer of the antiquities department, quoted anonymously, complained of the 'pressure to collect' within the museum (Eakin 2005).

Thus it appears that organizational policies and practices and institutional mission together pressured Getty officers into malpractice. Insiders certainly thought so. John Papadopoulos, True's deputy during the late 1990s, was later to place more blame on the 'nature of the job' than on True herself (Felch and Frammolino 2011, 145). To justify any wrongdoing, Getty officers had recourse to a neutralizing discourse structured around arguments seeking to condemn the condemnors (in the form of the Italian state) and appeals to a higher loyalty (Sykes and Matza 1957; Mackenzie 2005, 203–205). The most usual attack on the condemnors was to point to the poor state of archaeological conservation and access within Italy itself, contrasting it unfavorably to the Getty's own high standards of curation and exhibition (which were never in dispute). There is True's hostile response to an Italian archaeological official, for example, who had written to her in 1993 asking whether she knew how many archaeological sites would have been plundered for a single object to reach the market, to which she replied:

> I have proposed publicly to your Ministry that we would agree to stop collecting (which is our legal right and privilege) if and when your country would be willing to lend us works of art for display long term. Our greatest hope is that someday the funds that now go for acquisition could be put to more constructive use conserving the monuments that so badly need them (Felch and Frammolino 2011, 122).

It was a recurrent theme. In 1991, at a conference in Rome, she had claimed,

> Archeologists in both the art-rich nations and the collecting nations abroad are particularly vehement in their condemnation of collectors and collecting institutions, most often blaming them for the destruction of sites and contexts. Yet when we examine the current condition of the sites of legitimate archeological excavations, we often find them neglected and crumbling. (Eakin 2007, para 42).

True has written since her trial that Italy was 'terrorizing' US museums and collectors and that money spent on her trial would have been better spent on heritage conservation (True 2011).

If Italy was undeserving of its own heritage, could the Getty be justified in ignoring Italian and US law in its push to assemble one of the world's foremost antiquities collections? Getty CEO Williams summed this question up succinctly when he asked in 1987: 'Are we willing to buy stolen property for some higher aim?' (Felch and Frammolino 2011, 90, 218). In October the same year, in an internal Getty memo, True asked the same question:

> The market in antiquities is perhaps the most corrupt and problematic aspect of the international art trade. Accepting the premise that the majority of antiquities on the market were likely to have been removed from their countries of origin illegally, can we justify collecting these objects at all? (Eakin 2007, para 21).

Her answer was that without the intervention of the Getty such material might disappear from public and scholarly view, and that 'Given these alternatives, purchase by the Getty Museum under conscientious guidelines, followed by prompt exhibition and publication, may be the best possible outcome for such an object.' (Eakin 2007, para 21). A few years earlier, Houghton had provided a similar answer to a similar question posed by Walsh (Felch and Frammolino 2011, 60). The higher loyalty for Getty officers was conveniently to hand in the form of the museums' generic mission to collect, conserve and educate, distorted perhaps by a belief that 'art' should not be subject to the normal constraints of law – a separation of the sacred from the profane.

A criminogenic psychology of collecting?

That the Getty, as evidenced above, routinely purchased trafficked antiquities for its collection suggests an organizational culture of tolerance if not approval of malpractice. In other words, as Apel and Paternoster (2009) maintain, corporate criminal conduct is fostered not by the 'characteristics of the individuals but the characteristics of the situations or organizations within which individuals find themselves' (p. 20). Other scholars suggest, however, that such tolerant organizations may attract people with personality characteristics conducive to deviant behavior (c.f., for example, Coleman 1987; Gottfredson and Hirschi 1990; Wheeler 1992). Blickle et al. (2006), for example, found that characteristics such as hedonism, narcissism, grandiosity, a need for admiration, lack of empathy, and low self-control were significantly higher in convicted white-collar criminals than in a comparison group comprising managers currently active in German corporations. Similarly, Bucy et al. (2008, 409) identified from interviews with federal prosecutors and white-collar criminal defense counsel several personality traits characteristic of the white-collar offenders with whom they had dealt, including arrogance, cunning, aggression, risk-taking, greed and narcissism.

At the very least, *arrogance* and *risk-taking* accurately describe True's acquisition activities. In 1987, for example, on a trip to London to examine the Morgantina Aphrodite which the Getty was then considering for purchase, True canvassed the opinions of several experts on its authenticity and artistic significance. One expert was forthright in warning True against the statue's purchase:

> Anybody who knows about southern Italian sculpture is going to know it came from Italy . . . this is really dangerous, Marion . . . . How are you going to explain this? I beg you, don't buy it. You will only have troubles and problems (Felch and Frammolino 2011, 88).

Clearly, then, True was made aware that the statue would be a risky acquisition, yet True and other Getty officers not only moved forward with its purchase, but in order to facilitate its acquisition and mitigate associated legal risks formulated the 1987 acquisition policy. Similarly in 2002, True proposed the purchase of a $4 million bronze statue of Poseidon with a provenance sourced ultimately back to Symes as original owner. A lawyer who was at the time investigating Symes called True 'insane' for even considering the piece (Felch and Frammolino 2011, 221).

True's risk-taking suggests that if the reality of a criminogenic (museum) culture is acknowledged, the next step is to consider the people who might regard that culture as offering an environment accommodating of their own personal projects and moralities (Apel and Paternoster 2009). In other words, might the personalities of people entering the museum profession predispose them to break the law? Art museum curators are often judged on their success as collectors,[21] so perhaps another way of framing the question is to ask whether the personal psychology often associated with collecting – a primary museum mission – is at some level criminogenic.

The practice of collecting is traceable back to antiquity and was flourishing by the time of the Romans, who began to create collections of curious objects obtained as spoils of war (Cabannes 2003). Collecting began to blossom as a popular activity in the late nineteenth century, when developing consumer culture coupled with increasing leisure time made the activity of collecting a 'phenomenon of the masses,' allowing its acceptance as a legitimate pastime (Belk 1995; Pearce 1995, 39–158; Laborde-Tastet 2003). Collecting is now regarded as a harmless recreation, and a large survey of collectors conducted in the 1990s concluded that they 'are revealed as quite "normal" people who engage in a particular practice, rather than the deviants of popular and media mythology' (Pearce 1998, 176). But popular and media mythology aside, collectors themselves sometimes describe their 'compulsion' to collect (Belk 1995, 141–142), often to a point that is damaging personally and socially and that in extreme cases has been characterized as an addiction (Belk 1995, 143–144). Compulsive collectors are not alone in regarding their activities as abnormal. Henri Codet, a French psychoanalyst and psychiatrist, compared what he termed the 'mania of collection' to a pathology not unlike a 'cancer or yellow fever' (1921). Another psychologist (and himself a collector), Werner Muensterberger, notes that, in observing collectors, 'one soon discovers an unrelenting need, even hunger, for acquisitions' (1994, 3), and collecting becomes an 'urge if not nagging obsession' (p. 8). Psychological studies of compulsive collecting have emphasized the collector's seeming pathological need for control or self-esteem, achieved vicariously through the material medium of the collection (Belk 1995; Baekeland 1981), thus mirroring the proposed narcissism of white-collar criminals.

The peculiar attraction of art and antiquities, in particular, for compulsive collectors has been discussed at length. Expressing what Oscar Muscarella, himself a former curator of antiquities at the Metropolitan Museum of Art, referred to as a singular 'lust for antiquities' (2000), antiquities collectors seemingly pursue ancient objects for different reasons:

> . . . to some it may be sheer possessiveness . . . to others it is the thrill of discovery, or, in the case of antiquities, the powerful emotional experience of owning an object that was cherished a millennium ago, by an appreciative Sicilian or Roman citizen. It serves as evidence of continuity and symbolic communication with a distant past (Muensterberger 1994, 25–6).

Laborde-Tastet (2003) has discussed the 'passion' of the collector, and it is perhaps no accident that the book published by the Getty cataloguing the private antiquities collection of Lawrence and Barbara Fleischman collection, subsequently acquired by the Getty in 1996, is titled *A Passion for Antiquities* (1994).[22] Even J. Paul Getty, whose museum was built as a memorial to himself and to his legendary status as both oil tycoon and art collector, considered himself addicted to collecting antiquities (Felch and Frammolino 2011, 16) and referred to his major acquisitions as 'great triumphs' (Getty 1965). On successfully acquiring a prominent statue of Hercules from the Lansdownes, a family of English nobility, Getty later wrote:

> My collector's instincts snapped to attention, and a sudden though only very faint hope arose. Could there possibly be a chance of obtaining the Lansdowne Hercules? I braced myself psychologically for what I was certain would be an eventual refusal and soon began the necessary diplomatic overtures to the Lansdowne family .... At last, to my incredulous joy, the family made its decision – one, which for me, was fantastically favorable. Yes, I could have the Lansdowne Hercules .... It is enough for me to know that this magnificent marble sculpture, which once delighted the Emperor Hadrian and for a century and a half was a pride of Britain, is now completely 'Americanized' – on view for all to see at the Getty Museum (Getty 1965, 24).

Lenzner (1985, 236) notes that Getty's collecting ambition had its roots in his desire to gain social standing, prestige, and respect, thus conforming to the narcissistic personality type already suggested for collectors and white-collar criminals. Wrote Getty in his autobiography, taste in art represents the 'difference between being a barbarian and a full-fledged member of a cultivated society' (Getty 1976, 259).

It can be argued, then, that art museums, because of their collecting mission and possession of the financial wherewithal to pursue an active collecting agenda, are likely to attract curators or other officers with a personality or psychology already inclined toward compulsive collecting, and one which would predispose them to the risk-taking of True and others and render them susceptible rather than resistant to the inducement of already institutionalized malpractice. In 1989, the then director of the Boston Museum of Fine Arts wrote that:

> Museum professionals are acquirers; we are inherently greedy collectors. Most of us go into the profession because the desire to accumulate and bring together objects of quality is in our blood. We are personally and professionally devoted to adding to and improving our holdings – that is what makes us tick. And to consciously or intentionally turn down a highly desirable object we can afford to buy on the basis that we suspect that it might have been removed illegally from its country of origin – and also knowing that it will end up in a collection of a rival institution or an unscrupulous private collector is a very hard thing to do (Shestack 1989, 97–98).

Thomas Hoving too describes his feelings when in 1972 as director of the Metropolitan Museum of Art he acquired the Euphronios Krater for a then unprecedented sum of $1 million: 'I sat back at my desk shuffling the black-and-white photos of my passion and felt a near-sexual pleasure' (Hoving 1993, 318).[23] In 1986, Houghton seems to have recognized this possible emotional or psychological predisposition to wrongdoing when he tendered Walsh his letter of resignation, in which he warned against 'curatorial avarice' (Felch and Frammolino 2011, 71–72).

The analytical separation that can be made between a criminogenic museum culture and a personal predisposition to wrongdoing might appear futile, as any causal inferences – that is, attributing the Getty's malpractice to either the organizational culture itself or to the psychological proclivities of its officers – are difficult to ground empirically and thus inherently problematic (Apel and Paternoster 2009). It should be remembered too that

museum officers are part of a broader constituency of antiquities collectors and dealers, with its own well-rehearsed neutralizing discourse elevating the perceived benefits of antiquities collecting while denying the harm it causes (Mackenzie 2005, 193–226; Elia 2009). Nevertheless, we feel that for practical purposes the separation has merit, and can be used to underpin some policy recommendations for museums that aim to establish a culture in which corporate malpractice is actively discouraged or obstructed and which is less attractive to potential 'avaricious curators' who might have a predisposition to compulsive collecting and thus an inherent vulnerability to an institutional culture of wrongdoing.

Conclusion

It does not appear to be public policy in the United States to bring criminal charges against museums that are in apparent violation of foreign patrimony laws. Despite the high-profile trial in Italy of Marion True and the publication of a series of incriminating documents by the *Los Angeles Times*, there has been no movement toward further investigation.[24] The preferred policy solution seems to be self-regulation by museums themselves or by the museums' profession, most usually achieved through acquisitions policies.

The issues examined in this paper, however, suggest that while policies of this sort have a necessary role to play in regulating museum practice, they fail to address underlying causes of wrongdoing within museums, and for better effect need to be supported by a more wide-ranging reform of museum governance. There is a worrying persistence of Houghton's idea of 'optical due diligence,' whereby the appearance of normative regulation is stronger than the reality of partial or reluctant adherence to regulatory guidelines.

In June 2008, for example, the Association of Art Museum Directors (AAMD) introduced recommendations on antiquities acquisitions that recognize the 1970 rule introduced by the Getty in 2006[25], but that weaken the rule's intent by making allowance for member museums to acquire pieces without a complete post-1970 provenance:

> The AAMD recognizes that even after the most extensive research, many works will lack a complete documented ownership history. In some instances, an informed judgment can indicate that the work was outside its probable country of modern discovery before 1970 or legally exported from its probable country of modern discovery after 1970, and therefore can be acquired. In other instances, the cumulative facts and circumstances resulting from provenance research, including, but not limited to, the independent exhibition and publication of the work, the length of time it has been on public display and its recent ownership history, allow a museum to make an informed judgment to acquire the work, consistent with the Statement of Principles above. (AAMD 2008: Guideline F).

The AAMD allows publication of such pieces on its web-based 'Object Registry,' with publication including information relating to provenance and the reason for acquisition despite incomplete provenance. By November 2012, this Object Registry listed 577 objects without complete pre-1970 provenance, acquired by 15 museums. Often, the reason provided for acquisition was simply that the object represents a class or quality of object not otherwise available within the acquiring museum, or that the museum is making the object publicly accessible. The AAMD itself states that 'the museum must carefully balance the possible financial and reputational harm of taking such a step against the benefit of collecting, presenting, and preserving the work in trust for the educational benefit of present and future generations' (AAMD 2008: Guideline F). Again, the justificatory claim of public benefit is being deployed to justify the acquisition of what might be stolen property. Thus it seems to remain widespread if not general practice within

the art museums community to acquire what are likely to be stolen antiquities, despite the formulation of policies that at first glance seem intended to proscribe such action.[26]

In this paper, we have isolated three possibly criminogenic aspects of museum culture and practice:

1. Institutional pressure might be brought to bear upon individual museum officers to violate the law in furtherance of the institution's goals (anomie theory).
2. There might be a culture within the museum that tolerates, condones or even inculcates wrongdoing as a normal component of professional practice (differential association).
3. There might be a tendency for museums to attract and employ curators and other officers with a morally flexible attitude toward wrongdoing in pursuit of what becomes conflated personal and professional satisfaction (the 'avaricious curator').

There is a developing consensus that policies hoping to control the traffic in antiquities should aim for market reduction, by discouraging demand in destination countries rather than by protecting archaeological sites and institutions at source (Chappell and Polk 2011, 106–107; Mackenzie 2011b, 80–82). Thinking about market reduction encourages consideration of the 'pyramid' of enforcement strategies championed by Braithwaite (Braithwaite 2002; Chappell and Polk 2011:106–111), where most regulatory work proceeds through persuasion and negotiation, with punitive sanction reserved only as a last resort after other options have failed. This pyramidal view of regulation is broadly in line with the policy of controlling museum malpractice through consensual codes of ethics, particularly as regards acquisitions. As we have shown, however, the observance of these codes has been and is still even in 2012 far from optimal. Perhaps it explains why True was brought to trial, as Italian patience with negotiation was tested and finally expired. To avoid further criminal trials, museum governance should be open to restructuring, with a view to improving normative compliance while preventing further criminal prosecution. Insights gained from our criminological analysis of Getty malpractice suggest three mitigating policies:

1. The museum mission should be altered to present a goal that is attainable without recourse to professionally deviant behavior. Ironically, at the Getty, True herself had declared herself in favor of such a process in 1997 when she endorsed the idea of loans and exchanges of material between museums as an alternative to collecting (True 1997, 137), although at the time, in Italy, her proposal received a cool reception. The suggested arrangement took concrete form in August 2007, however, when the Getty signed an agreement with Italy to return 40 antiquities, and to establish a long-term collaboration in which the Getty would receive significant antiquities on loan in exchange for the provision of conservation expertise and resources to Italy (Getty 2007).[27] Thus although the Getty is still committed to 'collecting, conserving, exhibiting and interpreting works of art of outstanding quality and historical importance[28],' the immediate pressure to acquire such objects through purchase or gift has dissipated.
2. There should be a genuine and transparent commitment among upper management in the museum to law-abiding, ethical behavior. Key to this are mechanisms of external oversight, either through the inclusion of external experts on the Board of Trustees, periodic external audits of acquisitions, or more simply perhaps, through publication of all acquisitions, including full details of provenance (Gerstenblith

2003b, 462).[29] Strong governance and a transparent culture of ethical compliance would protect curators and other responsible officers from institutional pressure emanating from within the museum to 'turn a blind eye' in furtherance of the museum's mission.

3. Following on from (2), there should be a clear division and separation of responsibilities within the museum between the officer/body responsible for identifying potential acquisitions and the officer/body responsible for deciding acquisitions on the basis of their legality. Simply and obviously, the Board of Trustees should be encouraged to engage in open, active and critical oversight of museum acquisitions and accept legal liability for any offences arising out of curatorial malpractice. This division of labor would protect museums from the actions of 'avaricious curators' and would also protect officers from scapegoating in defense of corporate misconduct.[30]

Within the context of the corporate criminological framework presented above, analysis of the acquisition policies and activities of the J. Paul Getty Museum especially during the curatorship of Marion True suggest that both museum cultures and the psychology of collecting may in fact have criminogenic dynamics. In light of such criminological insight, we suggested several regulatory changes that better address the more fundamental causes of museum malfeasance. These more wide-ranging museum governance reforms may contribute to the broader creation of what Alder and Polk (2005) and others have termed a 'culture of compliance' in which antiquities trafficking is controlled by focus on market rather than supply reduction in that unprovenanced antiquities are not consumed not out of fear of criminal prosecution and punishment but instead because consumers, including in this case museums and their officers, understand the fundamental 'consequence of their market behavior' (p. 110).

Acknowledgements

Neil Brodie acknowledges European Research Council funding under FP7 for the Trafficking Culture project, which has supported the writing of this paper. Blythe Proulx would like to thank the Trafficking Culture Project staff for their support and guidance on this paper. Both authors are grateful for the thoughtful suggestions of three anonymous reviewers, which they believe have gone a long way toward improving the clarity and quality of their text.

Notes

1. For example, in 2012, New York-based art dealer Subhash Kapoor was arrested on allegations of trafficking in looted Indian antiquities and hundreds of objects in prominent museums around the world were traced back to him (Halperin 2012; Pogrebin and Flynn 2012).
2. Notably, its 'One Hundred Missing Objects' series of illustrated booklets, and 'Red Lists' of endangered objects (ICOM 2013).
3. See Elia (2009), who has written on the 'mythologies' of the antiquities trade that facilitate the explanation, justification, and validation of antiquities collecting. These include the myths of: the old collection; the chance find; the reputable dealer; the collector as guardian of the past; and the guilty source country (p. 244). Elia is an archaeologist, but to a criminologist his 'mythologies' read very much like neutralizations.
4. *United States v. McClain (McClain II)*, 593 F.2d 658 (5th Cir. 1979), *cert. denied*, 444 U.S. 918 (1979).
5. *United States v. McClain (McClain I)*, 545 F.2d 988 (5th Cir. 1977), *reh'g denied*, 551 F. 2d 52 (5th Cir. 1977).
6. The McClain decision was further reaffirmed in February 2002 when US dealer Frederick Schultz was convicted under the U.S.'s National Stolen Property Act of conspiring to deal in

antiquities stolen from Egypt (Gerstenblith 2003a, 2009; Urice 2010). See also *United States v. Schultz*, 178 F. Supp 2d 445 (S.D.N.Y. 2002) aff'd 333 F3d 393 (2nd Cir. 2003).

7. Italy's Carabinieri (military police) have a specialized unit, *Comando Carabinieri per la Tutela Patrimonio Culturale*, which is responsible for the protection of the country's archaeological, cultural, and artistic heritage.
8. Hecht's trial ended in January, 2012 without verdict (Felch 2012). He died in February, 2012 at the age of 92 (Weber 2012).
9. Provenance is ownership history. Most antiquities that appear for sale on the market have only limited or incomplete provenance, so that it is not possible to reconstitute a secure chain of ownership. Thus judgments about title and the potential legal risks of acquisition are often subjective and based on what evidence of provenance is available. Acquisition policies are intended to reduce the element of subjectivity inherent in such judgments. (The related term provenience denotes the archaeological find spot and context of an artifact).
10. While as Geis (2007) and others have observed, *white-collar crime* is one of the most contested terms in all of criminology, we narrow our focus to examine the Getty's conduct through the lens of *corporate crime*; that is, non-violent, illicit conduct undertaken on the part of companies and its employees in furtherance of business goals (Green 2004) – more particularly, conduct prohibited by 'criminal, civil, and regulatory law and administered by the appropriate system of justice' (Simpson 2011, 481), thus widening the definition to encompass violations of law as well as overtly criminal acts (Clinard and Yeager, 1980, 16).
11. The Getty's first Curator of Antiquities (1973–1984), Jiri Frel, had other ideas. He believed that a world class museum required an in-depth 'study collection' of small and fragmentary though scholarly important pieces–pieces that would not necessarily be placed on display but that would be stored and made available for scholarly research (Felch and Frammolino 2011, 29). The outcome was the same. In 1994, at the instigation of True, the Getty returned to Italy several hundred ceramic fragments acquired by Frel between 1979 and 1981 that were found to have been looted from a sanctuary at Francavilla Maritima in Italy (True 1997, 143; Lyons 2010, 422–5), and in 2013 questions were raised about the suspicious provenances of more of his acquisitions (Felch 2013).
12. There are less sanguine opinions of these occasions. Reporter Nikolas Zirganos believes they were used for the 'preparation and closing of deals.' Symes and Michaelides would entertain archaeologists, museum curators, conservators and wealthy collectors to gossip about the market and what was available for purchase, and to arrange sales (Zirganos 2007, 318–9). Thus it would be possible for a customer on Schinoussa to purchase a stolen antiquity without actually coming into contact with it. Michaelides died in 1999, and in April 2006 Greek police raided what was by then Symes's villa on Schinoussa (Zirganos 2007).
13. The aggregate monetary value of these stolen antiquities, and thus the financial loss incurred by the Getty Trust upon their return to Italy, is significant. The purchase prices and estimated values of some of the returned pieces, when known, are provided here (the first two figures of the accession number indicate the year of accession): Asteas krater (81.AE.78), bought for $275,000 (Slayman 2006); Etruscan candelabrum (90.AC.17), bought for $65,000 (Watson and Todeschini, 2007, 84–7); Attic Red-Figured phiale fragments (81.AE.213), acquired in a series of 63 fragments between 1981 and 1990, with an average purchase price per fragment of $3000 (Watson and Todeschini, 2007, 226–27); Marble sculptural group of two griffins attacking a fallen doe (85.AA.106), valued at $5.5 million (Watson and Todeschini, 2007, 124–25, 389); Marble lekanis (85.AA.107), valued at $2.2 million (Watson and Todeschini, 2007, 124–25); Statue of Apollo (85.AA.108), valued at $2.5 million (Watson and Todeschini, 2007, 124–25); Attic Red-Figured kantharos (85.AE.263), bought for $200,000 (Watson and Todeschini 2007, 90–92); Apulian pelike (86.AE.611), bought for $42,000 (Felch and Frammolino 2005); Apulian pelike (87.AE.23), bought for $60,000 (Watson and Todeschini, 2007, 89–90); Cult Statue of a Goddess (88.AA.76), bought for $18 million (Frammolino and Felch 2007); Attic Red-Figured krater (92.AE.6 and 96.AE.335), valued at $800,000 (Watson and Todeschini, 2007, 117); Statuette of Tyche (96.AA.49), purchased for $2 million (Watson and Todeschini, 2007, 375); Apulian bell krater (96.AE.29), valued at $185,000; (Watson and Todeschini, 2007, 373, 378); Attic Black-Figured amphora (96.AE.92), valued at $275,000 (Watson and Todeschini, 2007, 374, 376); Etruscan amphora (96.AE.139), valued at $400,000 (Watson and Todeschini, 2007, 374); Fragment of a Roman fresco (96.AG.171), valued at $95,000 (Watson and Todeschini, 2007, 375); Etruscan amphora (96.AE.139), valued at

$400,000 (Watson and Todeschini, 2007, 374); Fragment of a Roman fresco (96.AG.171), valued at $95,000 (Watson and Todeschini, 2007, 375).

14. Houghton's 1984 opinion that no action would be taken against an importer not possessing certain knowledge is open to question. At the 2003 appeal trial of antiquities dealer Frederick Schultz (see note 5), the judge warned that conscious avoidance of fact does not constitute a defence (Gerstenblith 2003a, note 11; 2009, 31, note 44).
15. This statue is now believed by many authorities to be fake (Lapatin 2000). By 2012, it was being described by the Getty as 'Greek, about 530 BC, or modern forgery.'
16. Gianfranco Becchina is an Italian antiquities dealer who was convicted in Rome in February 2011 of illegally dealing in antiquities. He appealed the conviction (ICE 2012).
17. Walsh went on record as stating that the alternative 'guilty until proven innocent approach … is not only unrealistic, but in many cases works against the preservation of works of art' (Felch and Frammolino, 2011, 107). Against that opinion, the 1987 acquisition policy which devolved responsibility for checking provenance from the Getty to outside parties might also be interpreted as another example of what Houghton had characterized as 'self-enforced ignorance of fact' (Felch and Frammolino 2011, 71–72).
18. In August 1987, the Getty notified Italy about its intended purchase of the Morgantina Aphrodite. Italy replied that 'following research undertaken … no information has emerged concerning the provenance and authenticity of the object' (Eakin 2007, para 24). In fact, it was not until 2006 that a private investigative agency hired by the Getty uncovered evidence of trafficking in the form of photographs taken in the 1980s of the then newly excavated statue (Felch and Frammolino 2011, 288).
19. In 1995, under True's advocacy, and in response to her misgivings about the reliability of vendor guarantees, the Getty strengthened its acquisitions policy with the additional requirement that no piece would be purchased unless it could be documented as having been outside its country of origin by November 1995, the date of the policy amendment (True 1997, 139).
20. On October 23, 2006, the Getty Museum's Board of Trustees announced a new policy for acquisitions. For antiquities, article 4 states that:

    … the Museum will require:
    a) Documentation or substantial evidence that the item was in the United States by November 17, 1970 (the date of the UNESCO Convention on the Means of Prohibiting and Preventing the Illicit Import, Export and Transfer of Ownership of Cultural Property) and that there is no reason to suspect it was illegally exported from its country of origin, OR
    b) Documentation or substantial evidence that the item was out of its country of origin before November 17, 1970 and that it has been or will be legally imported into the United States, OR
    c) Documentation or substantial evidence that the item was legally exported from its country of origin after November 17, 1970 and that it has been or will be legally imported into the United States (Getty 2006).
21. In August 2011, James Cuno was appointed CEO of the Getty Trust. He was quoted as saying at the time of his appointment that his top priority was hiring a museum director for the Getty with 'an appetite for risk in acquiring extraordinary works of art' (Finkel and Boehm 2012). In September 2012, Timothy Potts was appointed as director. A former colleague spoke positively of him as someone 'who keeps his nerve in making big and sometimes adventurous acquisitions' (Finkel and Boehm 2012).
22. In 1996, the Getty acquired the Fleischman collection of 321 antiquities by a combination of gift and purchase (Getty 1994; Felch and Frammolino 2011, 144–146). In 1999 and 2007, 13 of the acquired pieces were identified as stolen and deaccessioned and returned to Italy (Watson and Todeschini, 2007, 372–378).
23. The Metropolitan returned the krater to Italy in 2006 (Metropolitan 2006).
24. It is surprising, for example, that the Attorney General of California failed to investigate the actions of the Getty Trust in incurring a large financial loss through failing in its fiduciary responsibility to adopt and implement an effective acquisitions policy that would guard against the need for deaccessioning restitutions of stolen antiquities (see Gerstenblith 2003b for argument). This inaction contrasts with a civil investigation of the Getty Trust ordered in July 2005 by the Attorney General to investigate allegations of improper disbursements made by the Trust during the 1998–2006 tenure of Barry Munitz as CEO (Lockyer 2006).
25. See note 20.

26. See Hagen (2012) for a more in-depth and critical though broadly concordant analysis of the Object Registry.
27. Italy has struck similar agreements with other museums (see note 8 above).
28. See the museum's mission statement at http://www.getty.edu/museum/about.html
29. A query concerning a deaccession made by one of the authors (Brodie) to the Getty press office during the writing of this paper went unanswered.
30. As of 2012, only potential acquisitions by the Getty costing more than a million dollars are reviewed by the Board of Trustees acting as a committee (http://www.getty.edu/about/governance/pdfs/bylaws12.pdf, 6; Finkel 2012).

Notes on contributors

Neil Brodie is Senior Research Fellow in the Scottish Centre for Crime and Justice Research at the University of Glasgow. Dr. Brodie is an archaeologist by training, and has held positions at the British School at Athens, the McDonald Institute for Archaeological Research at the University of Cambridge, where he was Research Director of the Illicit Antiquities Research Centre, and Stanford University's Archaeology Center. He was co-author of the report Stealing History, commissioned by the Museums Association and ICOM-UK. He also co-edited *Archaeology, Cultural Heritage, and the Antiquities Trade, Illicit Antiquities: The Theft of Culture and the Extinction of Archaeology,* and *Trade in Illicit Antiquities: The Destruction of the World's Archaeological Heritage.* He has worked on archaeological projects in the United Kingdom, Greece and Jordan, and continues to work in Greece.

Blythe Bowman Proulx is Assistant Professor of Criminal Justice in the L. Douglas Wilder School of Government & Public Affairs at Virginia Commonwealth University. With a background in both classical archaeology and criminology, her research interests include antiquities trafficking and transnational crime. In 2008, Proulx helped put together an international conference on organized crime in art and antiquities while serving as a key member on the planning committee of the International Scientific and Professional Advisory Council (ISPAC) to the United Nations. Her work has appeared in various journals including *Trends in Organized Crime, Journal of Criminal Justice, Journal of Contemporary Criminal Justice, Crime, Law & Social Change, Critical Criminology,* and *the Journal of Criminal Justice Education*.

References

AAMD, 2008. *Report of the AAMD task force on the acquisition of archaeological materials and ancient art*. New York: Association of Art Museum Directors.

Alder, C. and Polk, K., 2005. The illicit traffic in plundered antiquities. *In*: P. Reichel, ed. *Handbook of transnational crime and justice*. Thousand Oaks: Sage Publications, 98–113.

Apel, R. and Paternoster, R., 2009. Understanding 'Criminogenic' corporate culture: what white-collar crime researchers can learn from studies of the adolescent employment-crime relationship. *In*: S. Simpson and D. Weisburd, eds. *The criminology of white-collar crime*. New York: Springer, 15–33.

Baekeland, F., 1981. Psychological aspects of art collecting. *Psychiatry*, 44 (February), 45–59.

Belk, R., 1995. *Collecting in a consumer society*. New York: Routledge.

Bhattacharya, U. and Marshall, C., 2011. Do they do it for the money? *Journal of Corporate Finance*, 18 (1), 92–104.

Blickle, G., Schlegel, A., Fassbender, P., and Klein, U., 2006. Some personality correlates of business white-collar crime. *Applied Psychology*, 55 (2), 220–233.

Boston, 2006. *Museum of Fine Arts, Boston and Italian Ministry of Culture sign agreement marking new era of cultural exchange*. Press release, September 28. Boston, MA: Boston Museum of Fine Arts.

Bourdieu, P., 1986. The forms of capital. *In*: J. Richardson, ed. *Handbook of theory and research for the sociology of education*. New York: Greenwood, 241–258.

Braithwaite, J., 1989. Criminological theory and organizational crime. *Justice Quarterly*, 6, 333–358.

Braithwaite, J., 2002. *Restorative justice and responsive regulation*. Oxford: Oxford University Press.
Brodie, N., 2012. Marion true. Available from: http://traffickingculture.org/case_note/marion-true/ [Accessed 18 October 2012].
Brodie, N., Doole, J., and Watson, P., 2000. *Stealing history: the illicit trade in cultural material*. Cambridge, MA: McDonald Institute.
Bucy, P., Formby, E., Raspanti, M., and Rooney, K., 2008. Why do they do it? The motives, mores, and character of white collar criminals. *St. Johns L Rev*, 82, 401–571.
Cabannes, P., 2003. *Les grands collectionneurs*. Paris: Editions de l'Amateur.
Chappell, D. and Polk, K., 2011. Unraveling the 'Chordata': just how organized is the international traffic in cultural objects? *In*: S. Manacorda and D. Chappell, eds. *Crime in the art and antiquities world*. New York: Springer, 99–116.
Cleveland, 2008. *The Cleveland museum of art and Italy agree to exchange of antiquities and scholarship*. Press release, November 19. Cleveland, OH: Cleveland Museum of Art.
Clinard, M. and Yeager, P., 1980. *Corporate crime*. New York: Free Press.
Codet, H., 1921. The fate of collectors. *New York Times* [online], Oct 9. Available from: http://query.nytimes.com/gst/abstract.html?res=9B07EED81439E133A2575AC0A9669D946095D6CF [Accessed 7 February 2008].
Coleman, J., 1987. Toward an integrated theory of white-collar crime. *American Journal of Sociology*, 93, 406–439.
Dallas, 2012. *Deaccessioned artworks*. Press release, November 29. Dallas, TX: Dallas Museum of Art.
Eakin, H., 2005. An Odyssey in antiquities ends in questions at the Getty museum. *New York Times*, October 15.
Eakin, H., 2007. Treasure hunt: the downfall of the Getty Curator Marion true. *New Yorker* [online]. Available from: http://www.newyorker.com/reporting/2007/12/17/071217fa_fact_eakin [Accessed 18 July 2012].
Eakin, H., 2010. Marion true on her trial and ordeal. *New Yorker*. Available from: http://www.newyorker.com/online/blogs/newsdesk/2010/10/marion-true.html [Accessed 18 August 2012].
Eakin, H., 2011. What went wrong at the Getty. *New York Review of Books*, June 23.
Elia, R., 2009. Mythology of the antiquities market. *In*: J. A. R. Nafziger and A. M. Nicgorski, eds. *Cultural heritage issues: the legacy of conquest, colonization, and commerce*. Leiden, MA: Martinus Nijhoff, 239–256.
Felch, J., 2012. Italian case against antiquities dealer ends. *Los Angeles Times*, January 19.
Felch, J., 2013. Getty museum review targets its antiquities collection. *Los Angeles Times*, January 18.
Felch, J. and Frammolino, R., 2005. Getty had signs it was acquiring possibly looted art, documents show. *Los Angeles Times*, September 25.
Felch, J. and Frammolino, R., Getty lets her take fall, ex-curator says. *Los Angeles Times*, December 29.
Felch, J. and Frammolino, R., 2011. *Chasing Aphrodite: the hunt for looted antiquities at the World's richest museum*. New York: Houghton Mifflin Harcourt.
Finkel, J., 2012. Timothy Potts has ideas for Getty museum. *Los Angeles Times*, December 7.
Finkel, J. and Boehm, M., 2012. Getty museum to have Timothy Potts as director. *Los Angeles Times*, February 15.
Fortescue, E., 2012. Ex-director of Getty museum reveals why he was ousted. *Art Newspaper*. Available from: http://www.theartnewspaper.com/articles/Michael+Brand, + the + ex-director + of + the + Getty + Museum, + reveals + why + he + was + forced + to + leave/26926#LastComment [Accessed 19 July, 20 July 2012].
Fotado, L. and Moshinsky, B., 2012, September 20. UBS ignored limits on profitable trades, Adoboli lawyer says. *Futures Magazine*. Available from: http://www.futuresmag.com/2012/09/20/ubs-ignored-limits-on-profitable-trades-adoboli-la [Accessed 8 October 2012].
Frammolino, R. and Felch, J., 2005. Getty curator resigns in loan flap. *Los Angeles Times*, October 3.
Frammolino, R. and Felch, J., 2007. The Getty's troubled goddess. *Los Angeles Times*, January 3.
Geis, G., 2007. *White-collar and corporate crime*. Upper Saddle River, NJ: Pearson.
Gerstenblith, P., 2003a. The McClain/Schultz doctrine: another step against trade in stolen antiquities. *Culture Without Context* (13), 5–8.
Gerstenblith, P., 2003b. Acquisition and deacquisition of museum collections and the fiduciary obligations of museums to the public. *Cardozo Journal of International and Comparative Law*, 11, 409–465.

Gerstenblith, P., 2009. Schultz and Barakat: universal recognition of national ownership of antiquities. *Art, Antiquity and Law*, 14, 21–48.
Getty, J. P., 1965. *The joys of collecting*. New York: Hawthorne Books.
Getty, J. P., 1976. *As I see it: the autobiography of J. Paul Getty*. New York: Berkeley Books.
Getty, J. P., 1994. *A passion for antiquities: ancient art from the collection of Barbara and Lawrence Fleischman*. Los Angeles, CA: J. Paul Getty Museum.
Getty, J. P., 2005. *Statement regarding returned objects from the Getty*. Press release, October 3. Los Angeles, CA: J. Paul Getty Museum.
Getty, J. P., 2006. *Policy for acquisitions*. Los Angeles, CA: J. Paul Getty Museum.
Getty, J. P., 2007. *Italian ministry of culture and the J. Paul Getty museum sign agreement in Rome*. Press release, August 1. Los Angeles, CA: J. Paul Getty Museum.
Getty, J. P., 2013. *The J. Paul Getty museum announces the return of a head of Hades from about 400–300 BC*. Press release, January 10. Los Angeles, CA: J. Paul Getty Trust.
Gottfredson, M. and Hirschi, T., 1990. *A general theory of crime*. Stanford, CA: Stanford University Press.
Green, S., 2004. The concept of white collar crime in law and legal theory. *Buffalo Criminal Law Review*, 8 (1), 1–34.
Hagen, A. C., 2012. The efficacy of the association of art museum directors online antiquities registry. MA diss. Rutgers University, New Jersey.
Halperin, J., 2012, August 6. Major museums reel as the extent of Subhash Kapoor's alleged smuggling ring is uncovered. *Blouin Art Info*. Available from: http://www.artinfo.com/news/story/817780/major-museums-reel-as-the-extent-of-subhash-kapoors-alleged-smuggling-ring-is-uncovered [Accessed 29 September 2012].
Houghton, A., 1984. Acquisitions I: US customs, the mcclain decision and the national stolen property act. *Internal Memo*. Available from: http://chasingaphrodite.com/2011/10/26/did-museum-officials-violate-us-laws-houghton-on-the-mcclain-doctrine-and-crimes-of-knowledge/ [Accessed 3 April, 20 November 2012].
Hoving, T., 1993. *Making the mummies dance: inside the metropolitan museum of art*. New York: Simon & Schuster.
Hughes, E., 1962. Good people and dirty work. *Social Problems*, 10, 3–11.
ICE, 2012. *Agreement paves way for artifact's return to Italy*. Press release, June 18. Washington DC: US Immigration and Customs Enforcement.
ICE, 2013. *Transfer ceremony clears way for looted vase to be returned to Italy*. Press release, January 8. Washington DC: US Immigration and Customs Enforcement.
ICOM, 2013. Fighting illicit traffic. Available from: http://icom.museum/programmes/fighting-illicit-traffic/ [Accessed 26 May 2013].
Isman, F., 2009. *I predatori dell'arte perduta. Il saccheggio dell'archeologia in Italia*. Rome: Skira.
Laborde-Tastet, L., 2003. Le phénomène de collection chez le consommateur adulte: Indiana Jones et la quête du moulin à poivre. Dissertation Retrieved from, ftp://ungaro.u-bourgogne.fr/filser/2004/laborde.pdf [Accessed 7 February 2008].
Lapatin, K., 2000. Proof? The case of the Getty Kouros. *Source: Notes in the History of Art*, 20, 43–53.
Lee, D., 1999. Getty returns three stolen works. *Art Newspaper* (90), 1–3.
Lenzner, R., 1985. *The great Getty: the life and loves of J. Paul Getty – richest man in the world*. New York: Crown Publishers.
Levin, B., 2012, 20 September. UBS encouraged Kweku Adoboli to develop other interests outside rogue trading, which It condoned, says Lawyer/Old Boss. *Dealbreaker*. Available from: http://dealbreaker.com/tag/ron-greenidge/ [Accessed 8 October 2012].
Lockyer, B., 2006. *Report of the office of the attorney general's investigation of the J. Paul Getty trust*. Los Angeles, CA: Office of the Attorney General.
Lufkin, M., 2005. Ex-Getty antiquities curator appears in Italian court. *Art Newspaper* (164), December 7.
Lyons, C., 2010. Museums as sites of reconciliation. *In*: J. A. R. Nafziger and A. M. Nicgorski, eds. *Cultural heritage issues: the legacy of conquest, colonization, and commerce*. Leiden, MA: Martinus Nijhoff, 421–432.
Mackenzie, S., 2005. *Going, going, gone: regulating the market in illicit antiquities*. Leicester: Institute of Art and Law.

Mackenzie, S., 2011a. Illicit deals in cultural objects as crimes of the powerful. *Crime, Law and Social Change*, 56, 133–153.
Mackenzie, S., 2011b. The market as criminal and criminals in the market: reducing opportunities for organized crime in the international antiquities market. *In*: S. Manacorda and D. Chappell, eds. *Crime in the art and antiquities world*. New York: Springer, 69–86.
Manacorda, S. and Chappell, D., eds., 2011. *Crime in the art and antiquities world*. New York: Springer.
Metropolitan, 2006. *Statement by the metropolitan museum of art on its agreement with Italian ministry of culture*. Press release, February 21. New York: Metropolitan Museum of Art.
Muensterberger, W., 1994. *Collecting: an unruly passion: psychological perspectives*. New York: Harcourt, Brace & Company.
Muscarella, O., 2000. *And the lie became great: the forgery of near eastern cultures*. Boston, MA: Brill Academic Publishers.
Museums Association, 2012. Code of ethics for museums. Available from: http://www.museumsassociation.org/ethics/code-of-ethics [Accessed 22 October 2012].
Passas, N., 1990. Anomie and corporate deviance. *Crime, Law and Social Change*, 14, 157–178.
Passas, N. and Agnew, R., eds., 1997. *The future of anomie theory*. Boston, MA: Northeastern University Press.
Pearce, S., 1995. *On collecting: an investigation into collecting in the European tradition*. London: Routledge.
Pearce, S., 1998. *Collecting in contemporary practice*. London: Sage.
Piquero, N. L., Tibbetts, S. G., and Blankenship, M. B., 2005. Examining the role of differential association and techniques of neutralization in explaining corporate crime. *Deviant Behavior*, 26, 159–188.
Pogrebin, R. and Flynn, K., 2012, July 27. Museums studying dealer's artifacts. *New York Times*. Available from: http://www.nytimes.com/2012/07/28/arts/design/us-asks-museums-to-examine-collections.html?_r=0 [Accessed 28 August 2012].
Princeton, 2007. *Princeton university art museum and Italy to sign agreement over antiquities*. Press release, October 26. Princeton, NJ: Princeton University.
Reiss, A. and Biderman, A., 1980. *Data sources on white-collar law-breaking*. Washington DC: US Dept of Justice.
Renfrew, C., 2000. *Loot*. Legitimacy and ownership: the ethical crisis in archaeology. London: Duckworth.
Rowley, T., 2012, September 20. Risk didn't matter at UBS 'as long as you made money,' Adoboli lawyer tells court. *The Telegraph*. Available from: http://www.telegraph.co.uk/finance/financial-crime/9555785/Risk-didnt-matter-at-UBS-as-long-as-you-made-money-Adoboli-lawyer-tells-court.html [Accessed 8 October 2012].
Shestak, A., 1989. The museum and cultural property: the transformation of institutional ethics. *In*: P. M. Messenger, ed. *The ethics of collecting cultural property: whose culture? Whose property?* Albuquerque: University of New Mexico Press, 93–101.
Simpson, S., 2011. Making sense of white collar crime: theory and research. *Ohio State Journal of Criminal Law*, 8, 481–502.
Slapper, G. and Tombs, S., 1999. *Corporate crime*. London: Longman.
Slayman, A., 2006. The trial in rome. *Archaeology on-line*. Available from: http://archive.archaeology.org/online/features/italytrial/ [Accessed 6 February, 7 March 2013].
Sutherland, E., 1983. *White collar crime*. New Haven, CT: Yale University.
Sykes, G. and Matza, D., 1957. Techniques of neutralisation: a theory of delinquency. *American Sociological Review*, 22, 664–670.
True, M., 1997. Refining policy to promote partnership. *In*: *Antichità Senza Provenienza II, Bolletino d'Arte*. Rome: Ministero per i Beni e le Attività Culturali, 137–146.
True, M., 2008. The Fleischman collection was not a front. *Art Newspaper* (191), May 39.
True, M., 2011. 'Neither Condemned Nor Vindicated': Marion true on why it is hard to accept the lack of verdict after her five-year trial. *Art Newspaper* (220), January 8–9.
Urice, S. K., 2010. Between rocks and hard places: unprovenanced antiquities and the national stolen property act. *New Mexico Law Review*, 40, 123–161.
Watson, P. and Todeschini, C., 2007. *The Medici conspiracy*. New York: Public Affairs.
Waxman, S., 2008. *Loot: the battle over the stolen treasures of the ancient world*. New York: Henry Holt and Company.

Weber, B., 2012, February 9. Robert Hecht, antiquities dealer, dies at 92. *New York Times*. Available from: http://www.nytimes.com/2012/02/10/arts/design/robert-hecht-antiquities-dealer-dies-at-92.html?_r=0 [Accessed 25 January 2013].

Weinberg, N., 2010, June 6. Ring of thieves. *Forbes*. Available from: http://www.forbes.com/forbes/2002/0610/064.html [Accessed 8 October 2012].

Wheeler, S., 1992. The problem of white-collar crime motivation. *In*: K. Schlegal and D. Weisburd, eds. *White-collar crime reconsidered*. Boston, MA: Northeastern University Press, 108–123.

Zirganos, N., 2007. Operation eclipse. *In*: P. Watson and C. Todeschini, eds. *The Medici conspiracy*. New York: Public Affairs, 306–324.