



Antiquities Laundering: Corporate Data as Missing Tool

*Art and antiquities remain one of the least-regulated
high-value asset classes.*

*The Anti-Money Laundering Compliance Act changed that - but
implementation is still catching up.*

FINANCIAL CRIME

Antiquities Laundering: Corporate Data as Missing Tool

By Sayari Analyst Team · Published June 2025

Art and antiquities remain one of the least-regulated high-value asset classes. The Anti-Money Laundering Compliance Act changed that – but implementation is still catching up.

For decades, the art market operated in a regulatory blind spot. Banks faced strict Know Your Customer requirements, casinos filed Suspicious Activity Reports, and real estate brokers screened for sanctions. Antiquities dealers faced none. A gallery could accept \$250,000 cash for a Roman marble sculpture without knowing the buyer, and auction houses facilitated sales of looted artifacts through shell companies without compliance alarms.

The Anti-Money Laundering Act of 2020 (AMLA) marked a regulatory inflection point. The subsequent Anti-Money Laundering Compliance Act (AMLCA) formalized what regulators already knew: antiquities and high-value art move illicit wealth exceptionally effectively. The FinCEN 2022 study confirmed looted artifacts, sanctions proceeds, and narcotics profits routinely flowed through antiquities markets. Yet a critical gap persists: most transactions occur through corporate structures—holding companies, private foundations, offshore trusts—that obscure beneficial ownership. Compliance teams lack tools to see behind these veils.

Why Antiquities Are Structurally Ideal for Money Laundering

Antiquities possess qualities ideal for layering illicit funds. Valuation is subjective: no "correct" price exists for a 2,000-year-old Roman mosaic. Unlike securities or real estate, art valuations are defensible across wide ranges, allowing buyers to justify \$500,000 payments for items trading at \$100,000. Portability amplifies this—collections fit in shipping containers and move across borders with minimal friction, unlike geographically fixed real estate or commodities.

The antiquities market also lacks centralized provenance registries (unlike securities with CUSIPs or real property with deed registries). Art has fragmented auction records, undisclosed private sales, and provenance chains with decades-long gaps. This opacity makes distinguishing questionable pieces from clean title nearly impossible. Market structure enables layering: looted artifacts pass through multiple dealers, each transaction raising price and reputation. By reaching major auction houses, illicit origins are buried beneath layers of seemingly legitimate sales. The 2011 Iraqi National Museum case illustrates this precisely: pieces stolen in 2003 were recovered from auction houses and dealers receiving them through intermediaries with no apparent connection to original theft.

The AMLCA and What It Actually Requires

AMLA Section 6110 directed FinCEN to study art market money laundering risks. The 2022 study concluded high-value art and antiquities dealers posed material AML risk, prompting AMLCA, which redefined "financial institutions" under the Bank Secrecy Act to include dealers in high-value antiquities-items 200+ years old and valued at \$10,000+.

The requirement is categorical: dealers must establish AML programs, implement Know Your Customer procedures, maintain transaction records, and file Suspicious Activity Reports when transactions show money laundering signs. The old model-cash deals with minimal verification-is no longer compliant.

Yet regulation alone solves only half the problem. The statutory requirement says dealers must know customers. But what when the customer is a Delaware LLC with a beneficial owner overseas, operating through a private foundation, paying through an intermediary? Knowing the customer's name is not knowing the customer.

The Corporate Data Gap: Who Owns the Entity?

In high-value antiquities transactions, corporate structures are the norm. Buyers present as LLCs, foundations, trusts, or international entities. Compliance officers verify entities exist but cannot answer the critical question: who controls this entity, and does that person present money laundering, sanctions, or beneficial ownership risk?

The answer requires data most dealers don't access. Beneficial ownership registries exist but are incomplete, often non-searchable, and many still being populated. Offshore companies, layered trust structures, and nominee-directed foundations obscure beneficial ownership entirely. Enforcement actions document consequences. In 2021-2022, the Department of

Justice and Homeland Security Investigations initiated cases involving antiquities purchased through shell networks concealing illicit source funds. Looted Iraqi and Syrian artifacts appeared at major auction houses after passing through corporate entities with no visible connection to underlying purchasers. Law enforcement traced beneficial owners, but private compliance teams operating in real time had no practical mechanism to do so.

This is the corporate data gap. AMLCA compliance requires beneficial ownership verification, but tools remain fragmented. Dealers face gaps in FinCEN's Beneficial Ownership Database and commercial compliance databases. Smaller jurisdictions have limited reporting. Offshore structures remain opaque. Corporate registries are not connected. Compliance officers cannot reliably map ownership chains from buyer entities back to controlling natural persons.

What Defensible AMLCA Compliance Requires

Effective AML compliance relies on data integration: transaction data, buyer entity corporate structure, and beneficial ownership registry information across jurisdictions. Entity resolution is foundational—querying corporate databases across principal jurisdictions (Delaware, Nevada, New York, and major offshore financial centers) to map ownership structures, revealing related entities, parent companies, and nominee directors. Beneficial ownership verification identifies controlling natural persons. PEP and sanctions screening must apply to beneficial owners, not merely entity names. Transaction monitoring across time exposes layering schemes isolated transactions cannot.

For dealers and auction houses implementing AMLCA compliance, investing in tools uniting fragmented data is essential—requiring access to comprehensive corporate registries, beneficial ownership databases, and entity resolution capabilities. Manual review is feasible for large auction houses but unsustainable for hundreds of smaller dealers now under AMLCA's scope.

Effective compliance programs recognize corporate data as AMLCA's foundation, not a luxury. Sayari's financial crime platform provides access to over 400 million corporate entities across 250 jurisdictions, linked through beneficial ownership networks making entity resolution immediate. For antiquities market teams, this means moving from reactive, transaction-by-transaction approaches to proactive beneficial ownership verification.

The art market's regulatory awakening is real. AMLCA is law. Enforcement is beginning. Dealers and auction houses face a choice: invest in proper corporate data infrastructure now, or face incomplete compliance program consequences when enforcement intensifies.

To strengthen your organization's financial crime compliance program with comprehensive beneficial ownership data and entity resolution, request a demo of Sayari's financial crime platform. Learn how institutions in the antiquities market are closing the corporate data gap. Visit Sayari's financial crime capabilities to explore the full suite of tools designed for AML compliance professionals.

Please visit sayari.com to learn more.

This blog is for informational purposes and isn't intended to be legal advice.