INTRODUCTION

Each year, in Australia, property estimated to be valued at between two and three billion dollars is stolen from homes, shops, cars, factories and warehouses. Little of this property is recovered and returned to its owners or retained by burglars and thieves for their personal use. The remainder is sold or bartered, but the nature and extent of the re-distributional system for stolen property is little understood.

This article is an attempt to understand property crime not as a series of discrete individual and unrelated events, but as a market for goods and services, which, like any other market, is subject to the influences of supply and demand and government regulation. First, it aims to analyse the interactions between the parties in marketing terms, by regarding the participants not as individual burglars, thieves, receivers and accessories, as but as suppliers, distributors, retailers and purchasers (Roselius and Benton 973:178). As Walsh and Chappell noted over two decades ago, the failure of criminology has been to concentrate on individual offenders and to ignore the organisational arrangements among criminals. By looking at individual responsibility rather than at the relationships between offenders, it has overlooked the importance of the networks of interaction between goods and people (Walsh and Chappell 1974:114). Secondly, it argues that a broad range of regulatory strategies can be brought to bear on these markets in order to influence the behaviour of actors within them.

STOLEN PROPERTY AS A MARKET SYSTEM

My thanks to Mark Halsey, research student in the Department of Criminology for his assistance in identifying and gathering some of the research material for this paper and to Peter Toomey of the Victoria Police Dealers Squad, Ray Hammond, Executive Director, The Loss Register, Denis Challinger, Coles Myer, Ken Polk and Don Weatherburn for comments upon earlier drafts.

This is probably a very conservative estimate and is based upon police estimates of stolen property. However, retailers estimate that approximately 1% of turnover is lost each year through theft, amounting to goods valued at about $1 billion. How much of this theft is reported to the police is not known.
Little is known of the market for stolen goods. As recently as last year, the Home Office in England could still say (Sutton 1995:413):

Studies to date only hint at the extent of the market for stolen goods. There are no reliable estimates of the proportion of stolen goods purchased by the public through seemingly legitimate outlets, or under more dubious circumstances (such as over the doorstep or in the pub). There has been little research to date on the roles played by thieves, 'professional fences; and the public in the overall redistribution of stolen goods.

If we are to understand the market for stolen goods, it is essential that we obtain a clear picture of the size of that market in dollar terms, the types of goods that make up that market, supply and demand for those goods, their prices and their fluctuations, the distribution of those goods to different market segments, the size and length of the distribution chain and so on. In 1973, Roselius and Benton suggested such an approach as a fruitful means of devising strategies to disrupt the flow of goods between thieves and fences (Roselius and Benton 1973). They wrote:

Marketing is a total system of interacting business activities designed to plan, price, promote and distribute want-satisfying products and services to present and potential users. This definition assumes that much of the behaviour related to the distribution of stolen goods consists of rational, economically guided decisions. It also indicates that such distribution requires conscious effort decision making by the thief and fence.

I would like to extend their conceptualisation of the market concept to embrace the whole of the property redistribution system. In Figure 1 that system is portrayed as a flow of goods from their source as 'legitimate goods' to their conversion to stolen or 'illegitimate' property by burglars, thieves, shoplifters and the like, followed by their distribution to the ultimate purchaser either directly by the supplier, or through a number of intermediaries, or distributors or retailers. In this conception, burglars and thieves are regarded as the suppliers of goods to the market. Although some stolen goods are retained for their personal use and some recovered and returned to their original owners, a large, but as yet undetermined, proportion of the goods are placed on the stolen property market. Some of the goods may be sold directly by the suppliers to the ultimate purchaser. However, it is more likely that most stolen goods are sold to intermediaries who barter, purchase and re-sell goods onto the ultimate purchasers. These distributors, or retailers, may be full-time receivers of stolen goods, pawnbrokers and second-hand dealers, drug dealers who barter drugs for goods,
legitimate businesses or part time receivers who sell the goods at garage sales or weekend markets.

The ultimate purchasers of the goods may be friends of the supplier, complete strangers or members of networks of people who purchase and sell in what is known as the 'hidden economy' (Henry 1977). Although it is possible to guess the structure, the precise size and direction of those flows remains unknown.

THE STOLEN PROPERTY MARKET

Size

In Victoria, the Victorian Police have estimated the value of property stolen in all forms of property crime at about $521m.

VICTORIA

ESTIMATED VALUE OF STOLEN PROPERTY 1995-96

<table>
<thead>
<tr>
<th>OFFENCE</th>
<th>NUMBER OF OFFENCES REPORTED</th>
<th>EST CLEARANCE RATE</th>
<th>ESTIMATED TOTAL VALUE</th>
<th>AV VALUE4</th>
<th>MEDIAN VALUE5</th>
</tr>
</thead>
<tbody>
<tr>
<td>ROBBERY</td>
<td>1,827</td>
<td>37%</td>
<td>$2,438,676*</td>
<td>$1,677*</td>
<td>$200</td>
</tr>
<tr>
<td>AGG BURGLARY</td>
<td>247</td>
<td>70%</td>
<td>$200,000</td>
<td>$809</td>
<td>$23</td>
</tr>
<tr>
<td>BURGLARY RES</td>
<td>44,749</td>
<td>12%</td>
<td>$89,300,000</td>
<td>$1,995</td>
<td>$750</td>
</tr>
<tr>
<td>BURGLARY (OTHER)</td>
<td>269,491</td>
<td>18%</td>
<td>$39,800,000</td>
<td>$1,477</td>
<td>$240</td>
</tr>
<tr>
<td>DECEPTION</td>
<td>29,805</td>
<td>88%</td>
<td>$38,687,092*</td>
<td>$2,619*</td>
<td>$117</td>
</tr>
<tr>
<td>HANDLING</td>
<td>8,158</td>
<td>100%</td>
<td>$12,360,564*</td>
<td>$2,320</td>
<td>$450</td>
</tr>
<tr>
<td>THEFT FROM MOTOR VEHICLE</td>
<td>51,708</td>
<td>11%</td>
<td>$32,700,000</td>
<td>$632</td>
<td>$300</td>
</tr>
<tr>
<td>THEFT (SHOPS)</td>
<td>15,184</td>
<td>90%</td>
<td>$1,835,026*</td>
<td>$130*</td>
<td>$24</td>
</tr>
<tr>
<td>THEFT OF MV</td>
<td>32,468</td>
<td>15%</td>
<td>$226,700,000</td>
<td>$6,982</td>
<td>$5,000</td>
</tr>
<tr>
<td>THEFT (BICYCLE)</td>
<td>9,365</td>
<td>7%</td>
<td>$3,123,000*</td>
<td>$362*</td>
<td>$280</td>
</tr>
</tbody>
</table>

3 Estimates marked with an asterisk are previous year data.
4 Estimates marked with an asterisk are previous year data.
5 Based on previous year data.
In New South Wales and the ACT, it has been estimated that the direct cost of break, enter and steal and car theft alone is around $260m annually (Weatherburn and Grabosky 1996). Extrapolating these figures to the rest of Australia, and adding unreported retail and other thefts to these amounts, a figure of $2 - 3 billion would not be an overestimate of the value of goods available to be redistributed. However, in order to estimate how much property is redistributed through the stolen property market, we would need to know:

1. how much of the property was cash and how much was in the form of goods;
2. how much was recovered by police from the offenders and returned to the owners (which depends only partly on the clearance rate of crimes) and
3. how many of the remaining goods were retained for the personal consumption of the offender and how much was placed on the market.

Reliable estimates of that nature of property flows through the market are almost impossible to obtain. The head of the Victoria Police Dealers Squad, Peter Toomey guesses that possibly 20% of stolen goods (other than motor vehicles) are recovered, and approximately 1 - 5% is kept for the thief’s personal use, leaving some 75% to be re-distributed. Of that amount, he estimates that about 20% would be exchanged directly for drugs, 30% sold to professional receivers, about 10% through pawnbrokers and second-hand dealers with the destination of the remainder through other outlets or is simply unknown.

The nature of the market

Illicit goods are supplied from a variety of sources. As the above table indicates, they may come from residential or commercial premises by way of burglaries, they may be obtained by deception or theft, they may come from the streets, from wharves, cargoes and from workplaces such as factories, warehouses and offices and from

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6 Note that the clearance rate for motor vehicle theft is not the same as the recovery rate, which was 80%. The value of recovered vehicles was $179.5m

7 Personal communication.

8 Much, of course, will depend on the nature of the goods.
retailers by way of shoplifting. The thefts may represent the acts of individuals or groups who operate frequently or infrequently and who may involved in the criminal redistribution system, frequently or infrequently.

It is often alleged that the main sources of stolen property are burglaries, although the size of retail sector crimes\(^9\) (Shapland 1995) and of the hidden economy and the nature of its operation are more difficult to determine (Henry 1977).

The type of property stolen from buildings in Victoria is shown in the following table.

**VICTORIA**

**TYPE OF PROPERTY STOLEN FROM BUILDINGS IN 1994-95\(^{10}\)**

<table>
<thead>
<tr>
<th>TYPE OF PROPERTY</th>
<th>PER CENT</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cash</td>
<td>26.0</td>
</tr>
<tr>
<td>TV/VCR</td>
<td>22.2</td>
</tr>
<tr>
<td>Audio</td>
<td>10.9</td>
</tr>
<tr>
<td>Power tools</td>
<td>11.1</td>
</tr>
<tr>
<td>Electrical</td>
<td>6.9</td>
</tr>
<tr>
<td>Jewellery</td>
<td>11.8</td>
</tr>
<tr>
<td>Clothing</td>
<td>3.7</td>
</tr>
<tr>
<td>Computers</td>
<td>5.0</td>
</tr>
<tr>
<td>Prescription Drugs</td>
<td>0.3</td>
</tr>
<tr>
<td>Handbags/ purses</td>
<td>2.2</td>
</tr>
</tbody>
</table>

This accords with Jochelson’s recent study in New South Wales (Jochelson 1995:2) who found that the top twenty items stolen in burglaries were videos (10,000 pa), TVs (6,000 pa), power tools (4,000 pa), cameras, rings (5,450), stereos, watches (5,000 pa), compact disc players, jewellery chains, edge trimmers, lawn mowers, computers, microwave ovens, bicycles, tools, radios, photographic lenses, Walkmans, bracelets

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\(^9\) Retail sector crimes include shoplifting, internal theft, frauds, robberies and burglaries: Shapland 1995.

\(^{10}\) From Victoria Police Crime Statistics 1994-95.
and video cameras. Interestingly, no mention is made in either of those sources of theft of mobile phones, which has shown a dramatic increase of late but which would fit into the general profile of ‘stealable’ goods. Marketing theory would, not surprisingly, confirm that these are desirable items (Roselius and Benton 1973:197). They are items for which there is a pre-existing demand, especially if they are brand name goods, are of relatively high value (and therefore provide more cash per transaction), of low bulk and perishability (and therefore easier to transport and store), non-sized (and therefore do not require matching customer sizes to the product) and carry a market price (which provides a pricing comparator), indicating to the prospective purchaser that a ‘bargain’ may be had. This analysis would apply as well to large-scale thefts, such as truck loads of cigarettes, beer or groceries, although the distribution patterns of such goods would be more sophisticated and it is unlikely that these thefts would be carried out on a speculative basis.

A market analysis of this re-distributive system would also require information about the prices received for goods at any point in the distribution chain, the fluctuations in those prices, the balance between demand and supply, the means by which suppliers, distributors and purchasers came into contact with each other, the methods used to advertise or promote the sale of goods and the buying motives and habits of consumers (Roselius and Benton 1973:181).

In his recent examination of the stolen goods market for the Home Office, Sutton raised the question of the relationship between the market for stolen goods and the commission of offences, that is, whether the existence of the market for stolen goods provides a motivation for theft and influences what is actually stolen (Sutton 1995:413). Does demand drive supply? He concluded that (Sutton 1995:403):

the general increase in ownership of particular items, combined with a ready market for such items second hand, is exerting some influence

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11 See also Sutton 1995:402 who reports that in England the proportion of burglaries involving video equipment increased from 18% to 37% from the 1980s to 1990s, those involving TVs from 12% to 20% and that half of all burglaries with loss involved TV, video or hi fi equipment.

12 However, the Victoria Police provisional Crime Statistics for 1995/96, released in July 1996 notes that in 1993/94 there were 50,129 thefts from motor vehicles, of which 1,343 were mobile phone thefts. In 1995/96, there were 51,708 reported thefts from motor vehicles, of which 7,313 were for mobile phones.
upon both the rate of theft of those items and the general yearly increase in burglaries.

Before turning to analyse the market segments in more detail, some brief description of the regulatory approach to property crime is required.

A REGULATORY APPROACH

Criminologists have traditionally focused upon the criminal justice system both as a means of conceptualising criminal behaviour and of dealing with it. They have conceptualised stolen property markets in terms of the penal law, aiming to secure conformity with the law by detecting violations of the law, determining who is responsible for them and penalising violators in order to inhibit future violations by those who are punished and to inhibit those who might be inclined to violate the law if the violators were not penalised (Reiss 1984).

However, as Weatherburn and Grabosky (1996:2) have noted, this approach confuses the business of fashioning crime reduction policies with the problem of 'law and order'. Crime reduction strategies may encompass a broad range of measures, only some of which involve the criminal law. Some are very broad, come under the rubric of crime prevention, and may include, for example, community enhancement (Polk 1996) or methadone programs for drug addicts (Hall 1996), while others can be much more focused, for example, property marking.

A regulatory approach is one which looks at all of the instruments of social policy, of which law is one, (and of which the criminal law is merely a sub-set) to bring about compliance with a social or legal norm. Regulatory, market or economic approaches look at behaviour as rational, (Chappell and Walsh 1974b:487) and seek to secure conformity to law by resorting to means that induce conformity by taking actions to prevent law violations without the necessity of detecting, processing and penalising violators.

Regulatory methods can be public or private and utilise positive and negative sanctions, (Freiberg 1987). The criminal sanctioning system is concerned with the detection and apprehension of burglars, thieves, handlers or receivers and other parties to offences. It is generally reactive, and relies on police or specialist squads to respond to reports of criminal activity. In some cases it can be proactive, where specialist squads monitor the activities of pawnbrokers and second-hand dealers or
engage in 'sting' operations. Those few who are apprehended and charged may be convicted and sentenced, in which case the aim will be to deter, incapacitate and punish (Weatherburn and Grabosky 1996).

As a means of property crime control it is probably fair to say that the criminal law has had relatively little success in minimising harm. Over the centuries it has evolved slowly in response to changing conceptions of theft, and has had particular difficulties in coping with the activities of receivers of stolen property (Chappell and Walsh 1974).

As Blakey and Goldsmith observe (1976:1542):

> Despite the growth of large-scale criminal redistribution systems with their widespread adverse economic consequences, our society has been unable to develop correspondingly sophisticated legal measures to control the problem.

However, it retains a strong moral or denunciatory function in marking the boundaries of socially appropriate behaviour.

The civil law has had a relatively small part to play in the stolen property market. The civil law has attempted to balance the rights of innocent purchasers against those of innocent victims of theft. Laws relating to market overt and the like have developed to facilitate trade and commerce, while on the other hand, remedies for trespass or conversion have been relatively useless, give their cost and the impecuniosity of the defendants. Similar tensions are evident in the laws relating to the recovery of stolen goods from pawnbrokers and second-hand dealers. The growth of insurance has also meant that losses can be recovered by other means. Although suggestions have been made to expand the role of civil actions by victims against receivers (Blakey and Goldsmith 1976:1601), little has been done to encourage private actions against those involved in the stolen property redistribution system.

Administrative regulatory methods are those that governments may employ directly without recourse to the courts. Such methods include the licensing, registration or certification of people and their activities, trades, professions or occupations. They rely on sanctions such as suspension, disqualification or cancellation of licences.

In the property crime market, these regulatory methods are primarily invoked in relation to the activities of pawnbrokers and second-hand dealers and others who may deal in retailing goods. In the modern, de-regulatory climate, occupational licensing is regarded as expensive and generally anti-competitive (Victoria 1988:3).
Other regulatory techniques include environmental controls (for example, burglary prevention devices or target hardening), the use of technology (for example, property marking or identification), electronic or other forms of surveillance of property, the use of mass media or education to change public attitudes towards the purchase of stolen property, rewards for informers and the development of codes and standards for the production of goods or the conduct of businesses which may be involved in the legitimate property distribution system.

THE SUPPLIERS

The conventional image of the major supplier to the property crime market is the burglar, although Henry has argued that a proportion of that market is supplied through the hidden economy of workplace theft (Henry 1977). Large scale shoplifting and theft of bulk supplies are also major suppliers to the market. However, more is known about burglars than workplace pilferers and surprisingly little is written today about 'professional' burglars or thieves.

If the major source of supply to the property crime market is, indeed, the burglar then it is necessary to build a profile of such people in order to determine what methods are best used to diminish or disrupt the primary source of the supply to the redistributional market (Brantingham and Brantingham 1975; Waller and Okihiro 1978).

The most recent evidence available in relation to offenders who were involved in the re-distribution of stolen goods comes from the New South Wales Police Service as a result of its 'sting' operation called Operation Basalt (NSW Police Service 1995:10). Arrests arising out of this operation, which involved the setting up of a pawn shop in order to attract persons wishing to sell stolen goods, indicated that the average age was between 26 and 30 years, 98.5% had a prior criminal history, many with multiple priors for receiving, burglary, stealing and motor vehicle theft, 90% of males were under 22 at time of first arrest, most were unemployed, 61.7% were on bail, bond or parole and the majority were supporting a drug habit. Some were on methadone programs. 80% lived within 5 km of loan office, most of the offences were committed in the local area and 95% of the items were pawned within one week of the theft.

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13 A recent article in the Melbourne Herald Sun (18 May 1996) reported police as saying that 80% of those charged by the Dealers Squad who were caught trying to pawn stolen goods were drug addicts who obtained their goods from burglaries and shoplifting.
Weiner's study of an anti-fencing program in Detroit also found that the suppliers were aged between 20 and 29 years, with 62% having a prior record. Most of them were black (Weiner et al. 1983:315).

In England the evidence appears to be that illicit drug users, particularly heroin users are actively engaged in stealing and selling goods (Sutton 1995:404). Studies of lifestyles and economic behaviour of illicit drug users found that most commonly mentioned method of procuring drugs was by exchanging goods for drugs with drug dealers, although these studies did not distinguish between legitimate and stolen goods. Mott's review of self-reported offending by heroin users in Britain found that many financed their drug habits by handling stolen goods, theft and burglary. Mott (1992) estimates that regular heroin misusers may be responsible for between 7 - 29% of burglaries with loss. Other studies in the United Kingdom indicate that new heroin users tend to be young, unemployed and working class. In some areas, there is a causal relationship between growth in number of heroin users and rise in acquisitive crime such as domestic burglaries, commercial burglaries and theft from vehicles (Jarvis and Parker 1989:176). A study by Parker and Newcombe in 1987 found that 50% of one sample of burglars were known problem heroin users. This study, of 61 known users (reported in Jarvis and Parker 1989:177) showed that 26% financed their habit through burglary, 25% through shoplifting, 13% through dealing, 3% through shoplifting and burglary and 3% by theft and fraud. Jarvis and Parker's own study of 46 heroin users in England who were imprisoned or attending drug dependency units showed that 83% supported their habit by illegitimate incomes. 65% financed their habit through acquisitive crimes such as burglaries, cheque book fraud, street thefts and shoplifting.

To argue that most heroin users commit acquisitive crime is not the same as arguing that most acquisitive crime is committed by heroin users. Weatherburn and Grabosky suggest that there is evidence to support the contention that a small number of offenders account for disproportionate share of offending, but also that there are many offenders whose involvement is infrequent and transient (Weatherburn and Grabosky 1996; Jochelson 1995:6).

For many involved in such crimes, the crime may be opportunistic and engaged in just for the thrill (Sutton 1995:406). For others, theft may be a part of workplace culture. Henry's study of the hidden economy indicated that pilfering, or theft from
workplaces was not uncommon, especially in industries such as transport, warehousing, manufacturing and distributing (Henry 1977:28).

**Supply side strategies**

Strategies to limit the 'production' or supply of stolen goods onto the market can take several forms. Crime prevention strategies under the rubric of 'situational crime prevention' (Clarke 1995) have identified a range of measures aimed systematically to affect the immediate environment in order to reduce the opportunities for crime and to increase the perceived risk of crime. These include target hardening measures such as the use of alarms, locks, security devices, safes and the like which can serve to decrease the risk of some premises being burgled (Roselius and Benton 1973:180) although this may operate to displace offences to less secure premises (Clarke 1995:122). The role of insurance companies is influential in this regard as many companies will either increase premiums or refuse further insurance to victims of property theft if they fail to install appropriate locks or alarms. In the retail arena, electronic merchandise tags are frequently used to prevent theft.\(^{14}\)

Targeting the goods themselves is another strategy often suggested, but apparently little utilised. The literature is replete with recommendations for property identification or marking systems which might deter theft or re-distribution of the property (Blakey and Goldsmith 1976:1551; Roselius and Benton 1973:203; cf Harris and Clarke 1991), but there is intense resistance from manufacturers to add another step in the manufacturing process which will not directly enhance the marketability of those goods and add to the cost of production. Most stolen property is mass produced or fungible and is easily merged into the legitimate property market, hence property identification has been identified as a powerful tool for the location of stolen property.\(^{15}\)

However, it has been argued that not only is marking opposed by

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\(^{14}\) Clarke (1995:109) identifies twelve techniques of situational crime prevention, which he divides into three groups. The first group of measures is aimed at increasing the effort required to commit the crime and includes measures such as target hardening, access control, deflecting offenders and controlling facilitators. The second group of measures is intended to increase the risk of committing the crime and includes entry and exit screening and various forms of surveillance. The third group is intended to decrease the rewards of crime and includes target removal, property identification, removing inducements and rule setting.

\(^{15}\) According to Ray Hammond, Director of the Loss Register in Western Australia, (personal communication), between 14% and 18% of goods, other than motor vehicles is identifiable. He estimates that approximately 22% of stolen computing equipment, 10% of cameras and 6% of VCRs and TVs are identifiable.
manufacturers, but may also not be supported by property owners, who have much to gain by the non-recovery of allegedly stolen property and its 'replacement' through insurance.\textsuperscript{16}

The empirical evidence is lacking as to whether in fact property identification schemes influence thieves, dealers and the people who buy from them (Sutton 1995:411). Laycock (1986) reported a reduced burglary rate following a small-scale demonstration project in Wales but the Operation Basalt report noted that some 25% of property offered for pawn was clearly marked, so that one may conclude that the deterrent effect was minimal. Whatever the impact, it does seem clear that product numbering of part identification is little used and that voluntary marking schemes may only have a limited impact.

A cognate scheme is the creation of a register of stolen property, such as the Register of Encumbered Vehicles operated by NSW Department of Consumer Affairs. More recently, a private organisation, The Loss Register, based in Western Australia, has established an image-based database which currently contains 80,000 files in relation to goods valued at approximately $2 billion (Herald-Sun, 28 September 1995 and personal communication).\textsuperscript{17} The system is funded by subscribing insurance companies and is provided at no cost to law enforcement agencies. It is presently installed in Western Australia, Victoria and Tasmania and is intended to become a national and international database.\textsuperscript{18}

These schemes may not immediately deter suppliers, but if they hinder the subsequent distribution of goods, they may eventually affect the amount and type of property stolen.\textsuperscript{19}

\textsuperscript{16} See also Laycock 1986. The suggestion is that insurance fraud is a very large problem indeed, and that there may be very wide disparity indeed between the amount and value of property reported to the police (often because of the owner's contractual obligations with the insurers) and the actual amount of property stolen. Ray Hammond estimates that up to 25% of household insurance claims are fraudulent, either through overstatement of value or the fact of the loss itself (personal communication, August 1996).

\textsuperscript{17} Details of claims lodged with insurance companies are placed on the database to facilitate the return of goods.

\textsuperscript{18} The aim is to establish a Police National Property Tracing Database.

\textsuperscript{19} The record in relation to convictions is limited. According to an officer of The Loss Register, in three years it helped police gain 25 convictions and led to the recovery of $40m worth of goods, on a world wide basis. Overall, the recovery rate is estimated at 2.8%. The GIO estimates that the prevailing recovery rate is 2% (Personal Investment, July 1995:35).
The detection, apprehension, conviction and sentencing of burglars and thieves has been the major regulatory strategy adopted by governments. On the detection side, strategies such as sting operations have come in and out of favour in various jurisdictions but are now little used because of their cost and resource intensiveness. Sting operations were very popular in the United States in the 1970s and were designed to disrupt local stolen property distribution systems by having undercover police pose as fences to infiltrate the system (Langworth and Lebau 1992:135-6). They were very appealing to police because they appeared to affect the levels of crime in a community through deterrence or incapacitation, created good public relations for them, as they tended to make police look effective through the publicity which attended the announcement of the number of arrest, convictions and sentences and the usually large amount of property recovered and returned to the owners. Such operations also showed police in a favourable light because they portrayed them as proactive and creative (Weiner et al 1983:311) and as attacking particularly career, professional or recidivist thieves and burglars.

Operation Basalt appears to be a classic operation in this mould. Between December 1993 and June 1994, the NSW police established and operated four licensed pawnbrokers and second-hand dealers businesses. During that time some 15,000 stolen items valued at $2m were purchased through shops of which 50% was returned to their owners. By May of 1995 158 arrests had been made and 138 persons had been charged with 2,423 offences (NSW Police Service 1995).

Sting operations are problematic in two ways. First, where such operations border on entrapment, legal complications may arise which may vitiate conviction or sentence. Secondly, the empirical evidence appears to indicate that while there may be some temporary and local disruptive or suppressive effect on property crime, in most cases such operations have no effect on the overall level of property crime. On the other hand, there is little evidence that such operations actually increase crime by increasing the availability of outlets for stolen property (Raub 1984:78).

Criminal strategies directed at increasing the number of persons sentenced to imprisonment, and the length of prison terms have also been shown not to be effective. As Weatherburn and Grabosky (1996) have demonstrated, both deterrent

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20 By which is meant the establishment by law enforcement agencies of pawn-shops or second hand dealers' premises in order to detect sellers of stolen goods.
and incapacitative strategies are unlikely to produce lower property crime rates and alternative approaches to the supply problem are needed, particularly approaches which identify and deal with the reasons why goods are stolen in the first instance. Drug use has already been identified as one major cause and it has been suggested that methadone programs may diminish the need of addicts to obtain illegitimate income (Bell 1996). More far-reaching strategies which centre on the creation and maintenance of illegal drug markets seem to be doomed to failure in Australia, if the recent Victorian experience with attempts to reform drug laws is any guide. Similarly while evidence of the relationship between income inequality and crime, and unemployment and property crime is equivocal, there is much work to be done on the role of property crime as an income supplement.

**DISTRIBUTION**

The growth of stolen property redistribution systems parallels the growth of industrial societies. Whereas in pre-industrial societies movable property tended to be limited and relatively unique, the growth in the number of consumer goods, their mass production, greater mobility and better means of transportation and community saw the development of both legitimate and illegitimate consumer markets (Blakey and Goldsmith 1976:1512). Re-sellers, such as fences, found it easier to sell unidentifiable goods.

In their 1974 work on fencing, Walsh and Chappell postulated a ‘stolen property system’ which they defined as ‘a set of individuals and their interactions which locates, plans and facilitates, and executes the extraction of property from an owner ... and its transfer to a new owner’ (Walsh and Chappell 1974:115). This system had a number of modes: a research and planning mode, which involved the determination of the demand for an item and the means of its acquisition, an extraction mode, an exchange mode whereby the goods are transferred from the supplier to the distributor, a marketing mode, which involved the transportation, storage, packaging and ‘advertising’ of the goods, a redistribution or sale to the ultimate purchaser mode and an evaluation mode which completed the loop. This accorded with Roselius and Benton’s conceptualisation of the stolen goods market (Roselius and Benton 1973:179) and is based on the premise that most thefts/burglaries are committed with resale, rather than personal consumption in mind (Sheley and Bailey 1985). The argument runs that burglary and thefts are consumer and market-oriented crimes whereby the number and types of goods stolen are dictated by consumer demand. The re-
distribution system must, therefore, be regarded as a series of exchange relationships between willing parties, but unlike other illegitimate markets, such as drugs, the products exchanged are also available through legitimate channels, so that prices are driven down, rather than up, as is the case with prohibited and scarce products (Roselius and Benton 1973:181).

One of the hoariest maxims in the property crime literature is that which states that 'if there were no receivers, there would be no thieves', that thieves are dependent upon receivers (Colqhoun cited in Henry 1977:63). This view is predicated on the assumption that there would be no theft if thieves had nowhere to dispose of their stolen goods (Henry 1977:64). This flies in the face of both common sense and the nature of the capitalist market system. Although intermediaries such as pawnbrokers and second-hand dealers, professional fences and others have historically performed, and still perform, a vital function in protecting thieves from being caught in possession of goods, of storing and distributing the merchandise and providing prompt, albeit discounted payment for the goods, a market for stolen goods will always exist so long as there is a differential between legitimate and illegitimate prices. Consumers will always make contact with producers. What will vary is the length of the chain of distribution and the number of steps required to convert stolen goods into legitimate stock in the hands of the purchaser. The real issue in relation to fencing is not the existence of that market, but its allocative or redistributional efficiency and the extent of its influence on the production of stolen property.

In order to understand, and possibly disrupt, the property crime market, it is necessary to study convicted thieves, burglars and receivers to determine how and where goods are disposed of, to ascertain the role of supply and demand, pricing structure, the importance of speed of sale, retailing patterns and the dynamics of the buying process in the illegitimate market. Those dynamics would include factors which influence purchases such as price, the knowledge of the legal status of those goods and the psychological rationalisations used to neutralise guilt (Sutton 1995:413).

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21 The general estimate is that receivers pay about 25 - 30% of the retail price for goods: (Blakey and Goldsmith 1976:1515; NSW Police Service 1995:19). The Victoria Police estimate the range at between 15 - 20%. It has been suggested that reducing the amount paid per item by intermediaries or consumers simply serves to increase the number of items stolen: NSW Police Service 1995: 19.

22 That is, to what extent will the requirements of the purchasers influence the types of goods stolen. There is anecdotal evidence that a considerable amount of goods stolen will be stolen to order.
Relatively little has been published about the flow of property within the property crime market, although one would suspect that police intelligence would have reasonably accurate data about local distribution systems. Blakey and Goldsmith (1976:1518) quote Los Angeles authorities in the early 1970s to the effect that 95% of stolen property is ultimately redistributed, with the remainder presumably being retained for personal consumption. Sheley and Bailey (1985) estimated that between 50% and 78% of the total amount stolen may be sold. Distribution patterns may be different for car thefts where many thefts may simply be for short term transportation by young people.

In Australia, Jochelson also notes that there is no reliable information on the relative contribution of different patterns of distribution to the overall flow of stolen property from thieves to potential consumers' Jochelson 1995:1), but cites a 1991 United States study of a small number of apprehended burglars (Cromwell 1991) which indicated that 18% sold the goods to pawn shops, 22% traded property for drugs, 20% sold to friends or acquaintances, 20% sold to strangers and 18% sold to employees or proprietors of otherwise legitimate businesses.


Little research has been done on fencing, despite its central role in professional crime. More information is needed about the nature of the market for illicit goods and the extent to which the demand for various types of goods affects the incidence of theft. More should also be learned about the relationship of legitimate and illegitimate markets. Little is known about the pattern of distribution of stolen goods.... It would be desirable to have more information about the organization and operations of large-scale fencing operations, to aid in the development of better methods of law enforcement.

Various authors have categorised 'fences' or 'fences' in different ways. In the nineteenth century, Colqhoun classed receivers as (1) dealers connected with thieves who set up legitimate shops to cover their dealings; (2) dealers in second hand metals and goods; (3) innocent receivers who are not aware that they are purchasing stolen articles and (4) careless receivers who asked no questions (Henry 1977:65). However,
as Henry has noted, it later became clear that there were a number of ‘respectable’ people who purchased goods ‘in a loose manner’ (Henry 1977:67). Jerome Hall, in his classic work on theft, distinguished between professional fences and receivers of stolen goods in the workplace or neighbourhood (Sutton 1995:408).

Blakey and Goldsmith (1976:1531) typologised fences in the United States as (1) neighbourhood fences, i.e. small time operators in local area who are supplied by local thieves, small time shoplifters, dishonest employees, who have no permanent place of business, but not on operate on the streets; (2) outlet fences, i.e. those who sell through legitimate businesses; (3) professional fences, i.e. those who appear to be legitimate businesses but who primarily handle stolen property and (4) master fences, who direct large scale operations, organise large scale thefts or serve as brokers for others.

In the United States, these people often dealt with organised crime (Blakey and Goldsmith 1976:1535). In his work on the hidden economy, Henry was highly critical of these categorisations, arguing that they tended to stereotype fences as the ‘Mr Bigs’ of crime, and the thief as merely their employees (Henry 1977:70). He suggested, instead, that it was more productive to see offending as a part of ordinary peoples’ lives and that the illegal economy of property crime was peopled by some part-timers and some full time professionals, by people who were neither all good nor all bad (Henry 1977:75). In other words, the property crime market was simply a part of the total market for goods and services and had to be understood in that total context.

The conceptualisation of all intermediaries as ‘fences’ is therefore unhelpful, failing to provide a useful description of the functions they perform and the role they play in the economy. In the marketing system, intermediaries are specialists. The fence:

- performs an important function in the facilitation of property theft and
- is more likely to conform to the constraints of that situation than to the criminal justice system of which he has rarely been made a part (Chappell and Walsh 1974b:496).

Stolen property distributors must locate sources of supply and demand, determine the kinds of products to be exchanged and facilitate exchanges between buyers and sellers (Roselius and Benton 1973:185). As purchasers, distributors and retailers they may need to transport and store goods and provide finance, risk and market information. As business people, they must have the ability to price merchandise, having regard to current market prices, the available capital resources, promotional costs, personnel disbursements, storage and transportation costs, the costs of removing identifying
features from property, of possibly maintaining a legitimate front and, if necessary, of paying bribes to law enforcement officers (Blakey and Goldsmith 1976:1525). Ultimately, the price of goods will reflect the length of distribution chain, the costs of legitimising the product and the consumer’s awareness of fact the goods are stolen and the elements of risk and profit (Blakey and Goldsmith 1976:1526).

In the following analysis, distributors and retailers are categorised according to the proportion of their business that is comprised of stolen property as well as the amount of stolen property that they deal with. The regulatory strategies here are directed at increasing the probability of detecting the stolen property and lengthening the distribution chain, forcing up the prices of the goods and decreasing their competitive advantage in the market place (Roselius and Benton 1973:201; Blakey and Goldsmith 1976:1527).

**Pawnbrokers and second hand dealers**

Pawnbrokers have for centuries been regarded as the primary outlet for stolen property. However, in analysing the role of pawnbrokers and second-hand dealers in the property crime market it is necessary to distinguish between:

1. the proportion of stolen goods that are sold through pawnbrokers and second-hand dealers and
2. the proportion of the business of pawnbrokers and second-hand dealers which is comprised of stolen property.

In relation to the first matter, the New South Wales Police Service, on the basis of their information, believe that pawnbrokers and second-hand dealers are a prime outlet for dealing with stolen goods, but provide no information on the relative size of that market or of other markets (NSW Police Service 1995:21; see also Jochelson 1995:6). In 1986, the Victoria Police Force estimated that 90% of high quality jewellery stolen in house burglaries is disposed of through second hand dealers shops (Victoria 1988:7) although the current view of the Force is that most stolen jewellery is now traded through manufacturing jewellers of various degrees of probity. The Queensland police regard second hand dealers as an important outlet (Hill 1995:1).

Pawnbrokers and second-hand dealers have always played, and continue to play, an important role in the provision of short term credit for various segments of the community (Victoria 1988:17). I have not obtained statistics as to the size of the industry, but recently it was reported that one chain of pawnbrokers and second-hand
dealers, Cash Converters, which has 135 stores in Australia, processed some 10,000 transactions per week, with retail sales of $18.5m per year (Herald Sun 18 May 1996). Hill estimated that one million pawn slips are completed by pawnbrokers in New South Wales each year (Hill 1995:5). These figures indicate that the market is very large indeed and that either the stolen goods market is very, very large, or that the legitimate market for second-hand goods and credit is also significant.

Regulation by the state of second hand goods dates back many centuries. In Victoria, the Pawnbrokers Act 1861 was based on New South Wales legislation, the Pawnbrokers Act 1849 which, in turn, was drawn from earlier English legislation. Recently, the laws relating to dealing in second hand goods has been overhauled in Victoria, through the Second Hand Dealers and Pawnbrokers Act 1989, while New South Wales has before its Parliament at the moment the Pawnbrokers and Second Hand Dealers Bill 1995, the main purpose of which, according to Mrs Lo Po, is 'to restrict the trade in stolen goods' (Legislative Assembly, NSW, 6 December, 1995). However, legislation of this type has other aims, including restoring stolen goods to their rightful owners and regulating the provision of credit. The dilemma in this field has been balance the need to minimise the opportunities for income-generating property crime on the one hand, while avoiding the imposition of unwarranted restrictions on business or on law abiding citizens who need the services of pawnbrokers and second-hand dealers, on the other.

The crime control objectives of pawnbrokers and second-hand dealers legislation are intended to be achieved by the granting of licences and vetting the characters of licensees, imposing obligations on licence holders to maintain records of their transactions and to keep goods for certain periods of time and given police special powers to inspect both goods and records (Victoria 1988:7; Western Australia 1985:5-6).

In Victoria, in 1996 were nearly 11,000 registered pawnbrokers and second-hand dealers, of which only about 200 were credit providers or whose primary business was dealing in second hand goods. The remainder were retailers who required a licence to purchase goods by way of trade-ins for new goods.

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23 Internationally, Cash Converters, which commenced operations in 1984, has 288 shops in 11 countries and has a total turnover of $430m (Business Review Weekly, August 19, 1996, 27).
Licensing is a powerful and pervasive form of regulation. It can control entry into occupations and professions by setting standards in relation, for example, to age, prior criminal record or bankruptcy, it can regulate the nature and scope of activities by the placing of conditions on licences and can provide information to the public by opening licensing registers to the public. In a de-regulatory climate, licensing is seen as a form of restrictive practice in that it limits access to markets and restricts competition. It tends to be expensive to operate, requiring a regulatory body to issue, renew, and, if necessary, suspend or cancel licences. In 1988, the Victorian Law Reform Commission, together with the Regulation Review Unit, examined the legislation covering pawnbrokers and second-hand dealers and concluded that the licensing system did not effectively screen undesirable participants from occupations, failed to screen out those with police records and was too intrusive because it required the vetting of all entrant. Despite these failings, the Committee did not recommend the abolition of licensing because of the difficulties that would create for police who would not be able to locate dealers' premises (Victoria 1988:10).

Licensing is often coupled with record-keeping, this being the other major administrative strategy directed at reducing the re-distribution of stolen property. Record keeping requirements can be directed at both the goods themselves and their providers.

Details of property pawned or sold to dealers have long been required. These may cover the type and nature of the property, the date of sale, premises at which sold and the amount paid by the licensee. Such records may enable the tracing of transactions and requires access to records by police or inspectors. Although the efficacy of such measures has been questioned (Victoria 1988:11), modern technology seems to have given this regulatory technique a new lease of life. In Perth, it has been reported that the firm Cash Converters has installed a computer system linking its stores in Perth to police. At the end of each day all transactions are downloaded on to a police computer and checked against stolen goods reports (Herald Sun 18 May 1996). Hill reports that in Queensland, legislation requires that that computerised books and records be maintained. The practice is that data is downloaded to a police computer from which analysis is made and property identified (Hill 1995:1). This system allows for the cross matching of vendors, traded goods and stolen goods and could possibly open the way for the creation of a national data base of stolen goods. The analogy with the record keeping and crime control strategies of the Financial Transactions Reports Agency is
obvious. The Property Tracing Section of the Queensland Police Force has 28 police engaged in this intelligence process.

Records relating to those pawning or selling goods have proved to be problematic in the past. Proof of identity is often not required by legislation and the experience of most jurisdictions has been that the accuracy of the information provided is dubious (Victoria 1988:11). There is increasing pressure to require proof of identity, such as photo identification, either in all transactions or in high risk transactions only.

**Receivers/fences/handlers**

Receivers as a criminal category have only existed since the eighteenth century (Hall 1952; Chappell and Walsh 1974:157; Blakey and Goldsmith 1976:1542). The early common law focused on thieves, but with the growth of moveable property in the seventeenth and eighteenth centuries, it became apparent that receivers played an important part in the stolen property market and eventually the offence receiving became offence in own right, rather than being conceived of as accessorial liability. The regulation of the intermediary market by the criminal law has always been difficult and generally unsuccessful. Laws relating to receiving, or handling, which require knowledge of the receiver of the illegal nature of the goods and which require proof that the goods are in fact stolen limit make convictions difficult to obtain. A comparison of theft and burglary convictions with those of handling will reveal not only the dispersal of the sources of supply and the concentration of distribution, but also enforcement and prosecution patterns which reflect the difficulties of proof for the respective offences.\(^\text{24}\) Historically, there is evidence that prosecutions against receivers were limited because of the often close relationships between law enforcers and distributors (Chappell and Walsh 1974b:488)

Evidence of the activities of full-time, professional receivers is scarce. Other than the 'master fences', or brokers referred to above, most intermediaries are probably involved in other legitimate or quasi-legitimate activities.

**Legitimate businesses**

Stolen goods are often offered to legitimate business such as camera shops, wholesale and manufacturing jewellers as well as retail jewellery shops. Sutton (1995:410) suggests that in London it is likely that a lot of stolen jewellery is sold from jewellery

\(^\text{24}\) Of nearly 281,000 reported acquisitive property offences in Victoria in 1995-96, only about 8,000 were for the offence of handling.
shops which sell antique and second hand jewellery, however Henry argued that overall, legitimate shops were not a good outlet for hidden economy trade because such trade required a highly personalised relationships to be built up to sustain an ongoing connection and tended to expose the traders to unwanted risks. It also had the effect of undermining their normal trade (Henry 1977:27).

In relation to large scale thefts of consumer items such as groceries, cigarettes, tyres and the like, there are legitimate businessmen who seek to gain a competitive edge by selling stolen merchandise (Blakey and Goldsmith 1976:1520). Blakey and Goldsmith suggest that in the United States goods sold through legitimate outlets tend to have been mediated through professional or master fences who function as wholesalers by collecting and 'repackaging' or legitimising goods (Blakey and Goldsmith 1976:1531). In many such cases, the outlet trader may be aware that they are obtaining a considerable competitive advantage but not inquire too closely into the source of the goods.

**Garage sales/weekend markets**

There are no statistics which indicate the extent to which such outlets are used to dispose of stolen goods (Sutton 1995:412), although goods sold in such a manner may have the advantage of being an open market and have the aura of legitimacy which may be seen as justifying low prices (Sutton 1995:411). Although there have been some suggestions that promoters of regular fairs and markets should be required to keep records of those selling goods in nominated high risk categories, there is little direct regulation of this possible outlet for stolen goods.

**The drug exchange**

Little direct evidence as to how much property is directly bartered for drugs (Blakey and Goldsmith 1976:1515) although there seems to be some anecdotal evidence that drug dealers will exchange goods for drugs. In such cases, it is likely that those goods will be onsold to other intermediaries rather than to the ultimate consumer, although there is some evidence that in Australia a proportion of bartered goods are shipped overseas through contacts maintained by groups of overseas born drug dealers.

**PURCHASERS**

In one sense, all those who purchase from the supplier are 'purchasers' in marketing terms. However, where intermediaries purchase from the supplier for the purpose of re-selling, a key to understanding the property crime market is the behaviour and
motivation of the ultimate consumer who purchases the goods for his or her own consumption (Roselius and Benton 1973:182).

Stolen goods may come into the hands of ultimate purchasers either directly from the burglar or thief, or indirectly, through the distributors/retailers. It is the demand for such products from this market segment which will ultimately determine the supply, rather than the demand of the distributors. Demand for stolen goods will depend upon the nature of the goods themselves, such as videos, televisions, mobile phones and upon their status as stolen goods (Sutton 1995:411). Leaving aside the demand from the intermediary parties, demand for stolen goods may come from (a) unknowing consumers or (b) knowing, aware, reckless or wilfully blind consumers who are willing to take a risk to obtain a lower priced article. In return for the lower price they forego peripheral consumer rights or advantages such as warranty, range of items and after-sales service.

The size of this market segment is not known nor is the frequency with which people purchase such goods (Roselius and Benton 1973:189). As is the case with suppliers, purchasers may be infrequent or heavy, may prefer certain types of goods over others or be geographically, demographically or sociologically distinct.

The market may differ according to the source of supply. Those who buy directly from the supplier may be friends, neighbours, work-mates or in some other way connected, whereas those who buy from professional receivers or pawnbrokers and second-hand dealers may represent a completely different market segment.

One emerging market segment in Australia is the shipment of goods stolen from retail outlets to overseas destinations, particularly to former Eastern bloc countries. The price differentials, the large profit margins, the speed and ease of shipment, the established communication networks and the run-down in Customs services all combine to make this a growing and lucrative market, and certainly one where ultimate purchaser resistance will be non-existent.

One structural explanation of the demand for stolen goods looks to the state of the economy and the distribution of goods between different groups in the community. Sutton hypothesises that illegal trading may be related to state of the economy. Many poor, respectable families rely on second hand (legitimate and illegitimate) market, especially in times of recession. If there is greater demand in time of recession for cheap goods, more people may knowingly, or recklessly by stolen property (Sutton 1995:404). He argues that as the wealth gap grows, and demand for home
entertainment equipment grows, some of the demand by the less affluent may be met through illegitimate means. He writes (Sutton 1995:407):

Increasing manufacture, advertising and ownership of desirable consumer durables, coupled with changes in society such as unemployment and an increasing wealth gap, may represent important determinants of demand for particular types of goods at cheap rates among those who cannot afford or do not wish to buy such goods at retail prices, some of whom moreover are prepared to tolerate the possibility that they are stolen. This demand for particular goods influences what offenders consider suitable targets for theft, and knowledge of demand may make them more likely to engage in offending.

Henry, on the other hand, argues that the demand for stolen goods is not confined to certain low income groups but is endemic in all groups. His conception of hidden economy trading is different from fencing, blackmarketeering and hustling because the supply of goods comes not from an identifiable 'criminal class', but from relatively honest people in honest jobs who take goods from factories, warehouses, lorries, shops and workplaces as a side activity to their normal work (Henry 1977:20). These trading networks tended to be local clubs, pubs, workplaces, in fact any place where people meet and form relationships and he found that there was no clearcut division between those who buy and those who sell (Henry 1977:17). Members of hidden economy trading networks were only able to maintain their place in the network by being able to give and take (Henry 1977:24).

What is important, in marketing terms, about this form of trading, and indeed in understanding the purchasing activities of ultimate purchasers generally, is that the transactions are surrounded by ambiguity. In the ultimate market place, goods are seldom presented as 'stolen', but are referred to as 'cheap' or 'bargains', or as having 'fallen off the back of a truck' (Sutton 1995:410). Because everyone is on the look out for a bargain, everyone is a potential purchaser of stolen goods (Henry 1977:23). And even where there is suspicion that the provenance of goods is suspect, most purchasers will rationalise their purchases (Sykes and Matza 1957; Sutton 1995:408). If they ask no questions, the will be told no lies. If the victim is covered by insurance, who really loses? If new goods have been taken from manufacturers or warehouses, then corporations can probably afford the loss.
What strategies are appropriate to decrease the number of purchases of stolen goods by ultimate consumers? A study by Sheley and Bailey (1985) hypothesised that there may be a number of factors relevant to such purchases. They were (1) motivation: i.e. economic need, the prices of legitimate goods and the encouragement of others; (2) freedom from sanction: i.e. the fear of being detected and convicted of the crime of receiving or other formal and informal sanctions; (3) moral freedom: i.e. the purchaser's moral beliefs in the rightness or wrongness of purchasing stolen goods; their techniques of neutralisation; their perception of the seriousness of the crime, attitudes to victims, the value of goods and the relationship to the victim; and (4) opportunity: i.e. presence of stolen goods, the location of outlets and their ease of access.

Their study found that first that people who believed that their economic situation is poor enough to merit black-market purchases were likely to buy stolen property. Secondly, they found that the threat of formal criminal justice sanctions had no influence on their stolen goods purchasing behaviour. They also found that interfering with the opportunity to purchase would have little effect. The only strategy that they considered might have any impact was a moral appeal to those who are not strongly committed to purchasing stolen goods. Such an appeal would attempt to disarm the rationalisations of those who do buy by equating the purchase of stolen property with theft, by attempting more closely to identify the victims of the crime to indicate that the purchase of stolen goods was a crime and, more importantly, not a victimless crime. This strategy, although the most difficult of the four, was the only one considered to have some chance of success.

CONCLUSION

Understanding property crime as a market can provide a useful first step to devising strategic approaches to its control. What is apparent however, from this brief survey of the literature, is that our public knowledge of that market and its dynamics in Australia, is so impoverished as to border on the scandalous. Good policy cannot be developed on the foundations of ignorance.

However, good policy, in this as in other fields, also requires a broad understanding of the complete range of regulatory measures available to government and a willingness to be creative in their use. A heavier application of a narrow range of already failed measures is not the way forward. What is required is creativity on the
part of those who make the laws and enforce them. If they can be half as creative and resourceful as those who break the laws and operate in the property crime market, there may just be a glimmer of hope.
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