

This is a repository copy of *Exploring the practices of steal-to-order burglars: a different brand of offender?*.

White Rose Research Online URL for this paper: http://eprints.whiterose.ac.uk/144170/

Version: Accepted Version

## Article:

Addis, N, Evans, A and Malleson, N orcid.org/0000-0002-6977-0615 (2019) Exploring the practices of steal-to-order burglars: a different brand of offender? Security Journal, 32 (4). pp. 457-475. ISSN 0955-1662

https://doi.org/10.1057/s41284-019-00174-w

© Springer Nature Limited 2019. This is a post-peer-review, pre-copyedit version of an article published in Security Journal. The final authenticated version is available online at: https://doi.org/10.1057/s41284-019-00174-w

#### Reuse

Items deposited in White Rose Research Online are protected by copyright, with all rights reserved unless indicated otherwise. They may be downloaded and/or printed for private study, or other acts as permitted by national copyright laws. The publisher or other rights holders may allow further reproduction and re-use of the full text version. This is indicated by the licence information on the White Rose Research Online record for the item.

#### Takedown

If you consider content in White Rose Research Online to be in breach of UK law, please notify us by emailing eprints@whiterose.ac.uk including the URL of the record and the reason for the withdrawal request.



eprints@whiterose.ac.uk https://eprints.whiterose.ac.uk/

## Exploring the practices of steal-to-order burglars: A different brand of offender?

Nicholas Addis<sup>1</sup>, Andrew Evans<sup>2</sup>, Nicolas Malleson<sup>3</sup>

<sup>1</sup> Senior Lecturer, Department of Law and Criminology, Sheffield Hallam University.

<sup>2</sup> Senior Lecturer, School of Geography, University of Leeds.

<sup>3</sup>Associate Professor, School of Geography, University of Leeds.

#### Abstract

This research helps shed light on the largely overlooked practices amongst steal-toorder offenders, with a view to identifying ways in which steal-to-order offences may be disrupted through targeted intervention. Interviews were conducted with a sample of incarcerated burglars who have previously engaged in steal-to-order offences. In addition to highlighting a number of parallels between steal-to-order and non-steal-toorder offences, this paper illustrates the nature of professionalism exhibited by offenders during steal-to-order offences. Moreover, this paper reveals a behavioural continuum amongst offenders engaging in steal-to-order offences; those who steal-to-offer, those who steal-to-order more general items, and those who steal-to-order more specialist goods. The paper also highlights the potential lack of flexibility experienced by steal-toorder offenders, and the implications of this in challenging criminological theory of offender decision-making. The paper concludes by discussing how steps at both a residential and organisational level may be taken to effectively disrupt the practices of offenders during steal-to-order offences. **Keywords** Burglary  $\cdot$  Steal-to-order  $\cdot$  Stolen goods  $\cdot$  Crime prevention  $\cdot$  Modus operandi

### Introduction

In recent years there has been a wealth of research into the nature of burglary, and, in particular, the practices of burglars. Such work covers a range of areas, including offenders' target selection (Maguire and Bennett, 1982; Cromwell et al, 1991a; Armitage, 2006; Taylor, 2014; Townsley et al, 2015; Vandeviver et al, 2015), motivations (Cromwell et al, 1991b; Wright and Decker, 1994; Nee and Meenaghan, 2006; Sanders et al, 2017), modus operandi (Bennett and Wright, 1984; Bernasco, 2008; Markson et al, 2010; Fox and Farrington, 2012), as well as the offloading of stolen goods in order to acquire cash and/or drugs (Schneider, 2005; Sutton, 2010). From an offender's perspective, this latter element remains as important a part of the offence chain as the burglary act itself (Sutton, 2010).

With victim reports from the Crime Survey for England and Wales estimating the total value of stolen goods at  $\pm 1.8$  bn<sup>1</sup> (Shaw et al, 2015), there has been a multitude of research into stolen goods markets in recent years. This research has illustrated the varying nature of such markets, whether these include commercial 'fences' (dealers of stolen goods), residential fences, sales between offenders, the sale of goods in bars/pubs or door to door, or through online markets (Sutton, 1998; 2010). It is anticipated that developing knowledge of these markets will help identify opportunities for intervention

to try and minimise these activities, through the Market Reduction Approach<sup>2</sup> (Sutton, 1998).

Research into stolen goods markets has revealed a particular specialism amongst offenders; specifically, those who steal-to-order, whereby they will steal specific items as requested by potential buyers. Previous research has acknowledged the presence of steal-to-order offenders (Maguire and Bennett, 1982; Nee and Meenaghan, 2006; Sutton, 2008), with Sutton (2008) exploring the interplay between steal-to-order offenders, their fences and the demand for goods. However, there has generally been limited research into the practices of offenders during the course of these offences, which the current paper seeks to address.

## Why look at steal-to-order offenders?

One of the key reasons for work into offender behaviour is to develop a better understanding of the offending process, with a view to illustrating how this may be disrupted though identifying specific points for intervention. In relation to burglary, research has explored the varying typologies of offenders, to help develop a greater understanding of offender behaviour, support crime prevention, and support police investigation efforts (Vaughn et al, 2008; Fox and Farrington, 2012). The current paper furthers this work by advancing understanding of the practices employed by offenders during steal-to-order offences. However, those who engage in steal-to-order offences may also steal-to-offer, whereby they will offer stolen goods to a number of potential buyers, and will not necessarily steal-to-order exclusively (Sutton, 1998). Nevertheless, if it can be identified that the practices of offenders during steal-to-order offences differ, for example, to those exhibited during non-steal-to-order offences, in terms of what they steal, how they approach the offence, and how they offload their goods, this may help to identify ways in which intervention can be targeted to help reduce or disrupt such offences in future. This may be used to help inform subsequent crime prevention approaches, as well as to support police investigation efforts.

## Burglary, theory and stealing to order

There is a clear link between steal-to-order offences and environmental criminology explanations of crime. Whilst some criminological explanations of crime help to account for the locations that offenders may target (i.e. Routine Activity Theory -Cohen and Felson, 1979; Crime Pattern Theory - Brantingham and Brantingham, 1993), other theoretical perspectives help to shed light on the behaviour of offenders during the offence process. Rational Choice Theory is one such perspective. Devised by Clarke and Cornish (1985), the theory is based on the notion that when faced with a decision to commit crime, an offender will weigh up the potential benefits (financial reward) against subsequent risks (detection). Though initially concerned with the decision of whether or not to commit crime at a given opportunity, the features of this theory (i.e. the conscious, decision-making process) may be applied to most aspects of the criminal offence process; from deciding to commit an offence, through to offloading goods following an offence. Critics of this theory argue that the perspective views offenders as highly rational, reasoning individuals (De Haan and Vos, 2003), and overlooks some of the key emotional processes present within offending, including fear, guilt and shame, as well as factors such as moral ambiguity and impulsiveness. Nevertheless, there has been a wealth of literature that has identified a growing number of offenders as being highly rational individuals (Bennett and Wright, 1984; Nee and Taylor, 1988; Cromwell et al, 1991a; Nee and Meenaghan, 2006; Taylor, 2014; Nee, 2015). Such literature has identified the use of reasoned decision-making amongst a 'professional' category of offender, and, as such, Rational Choice Theory would appear to lend itself to offenders who may be deemed more 'professional' in nature (which may include offenders who steal-to-order).

Within the context of burglary, there is a vast body of literature that depicts burglars as 'professional' in their approach, demonstrating a degree of planning in their offending (Shover, 1973; Maguire and Bennett, 1982; Fox and Farrington, 2012). Moreover, past research has illustrated the level of procedural and perceptual expertise within the decision-making process of burglars (Wright et al, 1995; Clare, 2011; Nee, 2015), suggesting how offenders demonstrating such expertise also engage in a process of rational decision making during the offending process. For example, Nee and Meenaghan (2006) identified how more 'professional' offenders offen had some prior knowledge of the target and its occupants, usually for a number of days prior to the offence. In their work into burglary, Maguire and Bennett (1982) identified a 'high-level professional' burglar, who would typically plan their offences, target valuable items, and may steal-to-order during the course of their offending. Such offenders evolved through the cultivation of relationships with more discerning, trusted buyers of stolen goods, which could often take a number of years to foster. Similarly, in their research into experienced burglars, Nee and Meenaghan (2006) also identified the presence of

steal-to-order offenders; however, their findings suggested there to be a general increase in the sophistication exhibited by offenders in their disposal of stolen goods. As such, these papers help to situate steal-to-order offenders amongst a more 'professional' class of offender. Nevertheless, what these papers fail to do is to reveal the nature or practices of offenders during steal-to-order offences.

A key piece of work which has helped to shed light on steal-to-order offenders is that of Sutton (2008), who undertook interviews with 20 offenders under supervision within Mansfield and Nottingham's prolific offender units. Offenders reported being involved in steal-to-order offences, through requests for specific products at a specific time, or for a particular make and model of car. In such instances, offenders would retain a mental note of such demands and wait for the opportunity to steal the item, or until they were aware another offender was selling these items (Sutton, 2008). It was found through this work that stealing to order could influence the development of an individual's criminal career, the frequency of offending, or the types of goods taken and offences committed. For example, one participant was encouraged to steal cigarettes, and, as a consequence, turned to commercial burglaries to fulfil this request. Similarly, Sutton (2008) gives the example of an offender who stole whiskey regularly from supermarkets to sell to his friends, despite concerns he had about being detected, as this was outweighed by the knowledge that he could sell this on within 30 minutes following the offence. It was acknowledged through this research that once people in the community become aware that an offender is able to supply specific goods, they are subsequently approached on a regular basis with orders for particular items (Sutton, 2008), illustrating the dynamic between supply and demand with this type of offence.

This work also illustrated the value of commercial burglaries in supporting steal-toorder operations, whereby offenders will target commercial premises to enable them to supply large quantities of items (such as cigarettes or alcohol) through residential and/or commercial fences (Sutton, 2008).

The research by Sutton (2008) has been invaluable in illustrating the dynamics between steal-to-order offenders, their fences and the demand for goods, as well as providing an initial insight into the behaviours of such offenders. Nevertheless, it is hoped the current paper can build on this work, through offering a more detailed look into the practices exhibited during steal-to-order offences. Given the premeditated nature of these offences, it is important to examine the practices of offenders prior to, during, and following steal-to-order offences, exploring any key differences with non-steal-to-order burglaries, and, where appropriate, identifying any suitable opportunities for targeted intervention.

## **Data and methods**

The research presented in this paper took place between January and December 2015 in West Yorkshire, England. To provide some context to the current paper, interviews were undertaken in an adult male prison with a sample of 23 offenders who held prior or current convictions for burglary, with a view to developing a greater understanding of offenders' target selection and offending practices. Of this sample, 15 reported having stolen to order previously, and it was from this sub-sample that the current paper is based. Offenders in the current sub-sample were largely similar to those of the broader sample in terms of age, though had received on average a greater number of convictions and committed a greater number of burglary offences<sup>3</sup>.

The average age of participants in the current sample was 36 years. All participants had received previous convictions for burglary. Specifically, participants had received an average of 18 convictions for burglary, for an estimated average of 111 burglary offences (that were known and recorded, a number of which had been taken into consideration, or 'TIC-ed', at the time of the offender's arrest<sup>4</sup>). It is of note that a number of offenders stated that they had committed 100s (if not 1000s) more burglary offences for which they had never been caught (and which were not recorded). All participants reported taking drugs in the months leading up to their incarceration for their current sentence, the nature of which varied considerably amongst participants. As such, burglary appeared to play a varying role in offenders' drug use, whether this was to directly fund a physical addiction, or to support a lifestyle in which the use of drugs was an important component.

Interviews took place in the prison's legal visits department, and were recorded using written notes due to restrictions on the use of recording equipment. It is acknowledged that, as a result, it was not possible to record all responses verbatim. It is also pertinent to acknowledge the researcher's recognition of the potential for offenders to falsify accounts or present themselves favourably during interview, whether this may be through detaching themselves from criminal acts, or overstating their role in an offence (Elffers, 2010). However, it was decided that offender accounts would not be verified for the current project, not only due to the resources required to verify the accuracy of

such accounts, but also to help maintain the researcher's rapport with individuals during the interview process.

Interviews were semi-structured to ensure key areas were explored regarding offenders' offending practices, whilst providing sufficient flexibility to explore areas raised. Interviews focused on exploring the practices of offenders who had previously stolen goods to order; this included the demand for goods, the type of goods stolen, the means and speed of disposal, and the range/nature of techniques used by offenders. The interviews were purposely broad in nature to allow the researcher the opportunity to explore the practices adopted by offenders.

Interviews were transcribed and then analysed using a qualitative form of content analysis: 'Ethnographic Content Analysis' (ECA, as developed by Altheide and Schneider, 2013). Similar to the more traditional content analysis approach, ECA seeks out the presence of pre-determined themes within the interview transcripts; however, it provides a greater degree of flexibility than more traditional approaches. Under this approach, initial categories may be formed, yet may be amended and revised through the analysis of subsequent interview scripts, using an iterative approach. This affords greater flexibility to move between the phases of analysis, conceptualisation and interpretation than more traditional forms of quantitative content analysis (Altheide and Schneider, 2013). However, a more traditional form of content analysis was also used to quantify the occurrence of certain responses regarding offender practices. This was chosen to help understand the differences/similarities between offenders with regards to factors such as type of goods stolen, means of disposal, or speed of disposal.

## Findings

Steal-to-order or steal-to-offer?

Though this paper is concerned with offenders who have stolen to order during a burglary offence, as highlighted earlier in the paper it is important to acknowledge that offenders may also 'steal-to-offer', whereby they will steal goods before offering these to a number of potential individuals/groups (Sutton et al, 2001). Indeed, the offenders in the current sample also deployed steal-to-offer strategies as part of their offending repertoire:

*"Getting rid of it -* within the hour. 2 buyers - they will take everything. Do jobs, on way to friends, ring buyers say I've got this, *they will offer money etc., may be in a car, then meet and do deal"* (Participant Eight).

*"Go and try and get rid of* it. Had buyers lined up anyway. 10/20 different buyers - *different things. Know what people would buy"* (Participant Ten).

"We had a scrap man that we knew, go to guy" (Participant Two).

Indeed, it was apparent that participants were able to draw on a range of buyers that they knew would purchase specific goods, even if they didn't have buyers already lined up. Such buyers included commercial and residential fences, as well as network sales<sup>5</sup>, supporting previous work into this area (Sutton, 1998; 2008). Interestingly, in instances where offenders were unable to sell on goods, they described how they would make use of these for other purposes. For example, in such instances, offenders described utilising such vehicles to help facilitate their offences: "*Sometimes, if couldn't sell 'em, use cars, take plates from a matching car'*" (Participant 13).

It is also important to recognise that amongst the current sample of offenders who reported stealing to order, this was not the exclusive remit of their offending. Through interviews it emerged that stealing to order was simply one 'facet' of their offending as and when it was required; it is during the uptake of such opportunities that the current paper sought to explore. Interestingly, however, this was in contrast to the work of Sutton (2008), who found that some offenders only ever stole goods to order.

During interviews there emerged four key areas in which similarities/differences were identified in the practices of offenders during steal-to-order and non-steal-to-order offences, and it is these areas that provide the framework for the remainder of the results section. These areas were identified as follows: goods taken/demand for goods, means of disposal, speed of disposal, and the professionalism exhibited by offenders. For the purposes of interviews, stealing to order was defined as the stealing of goods specifically to fulfil an order placed by would-be buyers in advance of the offence. Goods taken/demand for goods

The goods taken by offenders during steal-to-order offences are illustrated in Table 1.

## <TABLE 1 HERE>

The two most commonly stolen-to-order items were technology products and jewellery. It became apparent that there appeared a degree of flexibility amongst offenders with regards to what they chose to take, depending on what was ordered at any given time: "Phone, wallet, jewellery, money, antiques, whatever people ordered" (Participant 11). The nature of goods stolen is consistent with the literature into items commonly stolen (Shaw et al, 2015). However, the above quote also illustrates how one of the primary drivers underpinning the items taken was the nature of orders received. One offender talked about how he had different people phoning him for different goods, creating a steady demand for goods: "Did steal-to-order; had different groups of people - they phone up to ask" (Participant 15). Offenders often described how they would "Keep an eye out for stuff" (Participant 11) once they had received an order for goods. One offender also described the immediacy of acting on an order if the price was sufficient: "If it was good money I would go straight out to do it after the order, otherwise I would just do it as part of my normal offending" (Participant Seven).

As can be seen in Table 2, in the current research the demand for goods was driven predominantly through network sales, in addition to commercial fences. As was also found in the work by Sutton (2008, p. 42), offenders were sometimes given a 'shopping list' or 'loot-list' from different buyers for goods that they would look out for in their offences: "Laptops etc. I sometimes had a shopping list" (Participant Ten). Moreover, when looking for particular goods, offenders reported that they would generally know the types of areas to target for goods: "Know types of areas [I would] go for money, and jewellery, etc." (Participant 11).

As well as being driven by the demand for goods, for a number of offenders, their preference for goods was also influenced by those that were easy to conceal and carry on their person. This provides direct support for Clarke's 'CRAVED' hypothesis (1999), which denotes the main features of goods taken by offending during acquisitive offending; 'Concealable', 'Removable', 'Available', 'Valuable', 'Enjoyable' and 'Disposable': "Gold is favourite - easy to conceal and get rid of" (Participant One) or: "Phones easier to take. Normally a laptop bag around, or carry without. Xbox in carrier bag" (Participant Three). This also supports previous work which has highlighted the importance of ease of disposal in influencing burglars' targeting of particular goods (Stevenson and Forsythe, 1998; Schneider, 2005) and, as such, highlights the importance of this factor when taking orders from would-be customers. What became apparent during interview was the degree of opportunism exhibited by offenders, whereby aside from targeting specific goods, the majority of offenders also demonstrated an inclination to take other goods that may be available, of high value, and easily disposable, providing further support for Clarke's CRAVED hypothesis (1999): "Only started burglaries for car keys. Used to steal cars. But as got more advanced had to have keys, so burgled to steal keys. But then whilst there may as well take everything else from there" (Participant 14).

What is also prudent to note at this point is the distinction between more general items that are stolen to order (for example, technology products such as laptops), and more specific items stolen to order (such as a particular make and model of car). With the latter, the demands of the buyer may be much more specific, and consequently offenders may need to be more discerning in their acquisition of such goods, particularly when compared to the procurement of more general items, which are likely to be more readily available. This distinction was particularly apparent amongst the current sample with the ordering of particular makes and models of car.

As is highlighted in Table 1, six offenders in the sample reported that they had stolen cars to order previously. It emerged that such offences predominantly targeted high performance cars: "When steal-to-order - performance cars; Audis, BMWs, R32 - 2/3 K, BMW - M5, Audi - RS5, Mazda, Golfs" (Participant 14), "Have stolen to order, i.e. Golf, £1000/£1500 per car. At time, don't think about specific features" (Participant Six), and: "Always got a specific car to get. Ford Mondeos. Others as and when" (Participant 13).

Offenders reported how they would receive orders for cars from: "Different groups of people - *they'll ring and ask*" (Participant 15). Often offenders would make initial contact from would-be buyers to take orders over the phone: "Go out on night - phone car dealer in Bradford - if he was after a car or general cars he would tell me cars he wanted" (Participant 13). A hybrid steal-to-order/steal-to-offer model was also described by one offender in relation to high value bicycles: "Lot of high value pedal

*bikes... If saw good bike, ring dealer, ask if they want them, and then do job and take it* to them" (Participant 4).

Once offenders received an order for cars, it appeared that they would go out and actively search for these; as one participant put it, such offences were "Opportunist but [with] some element of planning" (Participant 14). The same offender described how he would search for cars during the day, and, once a vehicle had been found, return later that evening to target the property in order to access the car: "Drive through the day, find somewhere, night-time, go drive there with tools" (Participant 14). It appeared that this offender only became involved in burglary because of the enhancements in vehicle security which meant that cars could not be stolen without keys: "Only started burglaries for car keys. Used to steal cars. But as got more advanced had to have keys, so burgled to steal keys." This supports previous work into the use of car key (or so-called 'Hanoi'<sup>6</sup>) burglaries, where properties are targeted to access car keys in order to steal a vehicle (Levesley et al, 2004; Shaw et al, 2010).

Offenders described how they would tailor the location of their search to the nature of the car they were looking for: "Depends on what car - go to right estate" (Participant 15). Offenders also appeared to demonstrate a somewhat flexible approach to searching for cars ordered: "Go out that night, looking for car...*if couldn't find car, go to new* area, always find it" (Participant 13). One offender described how he would target more affluent areas specifically to achieve this: "Would target nice areas, Harrogate, York, Leeds, Weetwood, Pudsey, all over. Drive about and see" (Participant Six). This was mirrored by other offenders, who described how they would often have to take more

time to find specific cars (or would receive specific intelligence in relation to the location of such models): "Go to get car. Ford - straightaway. If more exotic - take longer. Drive around, or get details of where they are" [Despite follow-up questioning the offender would not report on the nature of intelligence received in relation to this] (Participant 15). The same offender reported how he could drive potentially anywhere in the country to locate such vehicles: "If had to, could go anywhere. Length of the country for cars" (Participant 15).

### Means of disposal

The process of offloading stolen goods following a burglary offence was explored with offenders, with their preferences illustrated in Table 2. Unsurprisingly, an overwhelming majority of offenders (93%) reported that they would offload goods to one or more buyers already lined up. This supports previous work into this area; for example, Schneider (2005) identified handlers as being the first choice of disposal for burglars.

### <TABLE 2 HERE>

The majority of offenders described having at least one or more 'contacts' who would buy stolen goods from them, suggesting a clear demand for stolen goods: "Had buyers lined up anyway. 10/20 different buyers - different things. Know what people would buy" (Participant Ten) and: "Good 50/60 buyers. Phone me on daytime - asking for stuff" (Participant Four). As well as reporting having a number of contacts whom they could draw on to sell stolen goods, some offenders reported only selling on to one associate, with whom they had developed a working relationship: "Got a guy, Polish guy, he will get rid of everything. Takes it back to Poland mon*ey he's made. He's met* me before, and picked me up in the car" (Participant Five) and: "Stopped going to pawn shops, had mate on estate - buy off me" (Participant Six). Other offenders reported having particular relationships with buyers for specific types of goods: "Just get laptops etc. - got a guy on [the] market who buys them" (Participant 13).

What was of particular interest was how drug dealers were also used to sell on goods; whether this meant that offending jobs were given to offenders in exchange for drugs, or where drug dealers would simply pay offenders in drugs: "Drug dealers would coordinate things. They would feed you drugs and you do jobs for them. All goods [mostly] go to drug dealers, then drug dealers give out drugs" (Participant One) and: "Loads of drug dealers - take anything off your hands. Always buyers - they can give you most money for stuff. Give you more money in drugs than money. Worth it to do like that. And then sell drugs on" (Participant Four). As such, this helps to illustrate the varying dynamics between offenders and drug dealers, including the potential exploitation of offenders by drug dealers in order to facilitate the commissioning of offences.

Other means of offloading stolen items included the use of public houses and jewellery stores. Importantly, pawn shops were reported by a third of offenders, supporting previous work into this area (Wright and Decker, 1994; Clare, 2011): "Handling and selling stolen goods, Cash Converters" (Participant Four).

17

## Speed of disposal

As well as seeking the safest/most effective methods to offload stolen goods, the speed at which goods were offloaded also emerged as an important finding. It was found that offenders' journeys away from an offence were predominantly dictated by the need to sell on their stolen goods. Specifically, 87% of offenders questioned described how they would travel directly from an offence to get rid of their stolen goods. As can be seen in Table 3, 67% of offenders reported that they would get rid of goods within the hour following an offence, and all but one of the sample would typically get rid of goods within two hours following an offence, supporting previous research into the disposal of stolen goods amongst burglars more generally (Sutton, 2003; 2008). Of particular interest was the concept of a 'burglary to disposal window', which emerged during interview with one offender, who described how he would only offend once he knew he would be able to dispose of the goods immediately: "Standard cars - get as soon as can get rid" (Participant 15).

## <TABLE 3 HERE>

There appeared to be one key factor impacting on the speed at which stolen goods were offloaded: the time of the offence. To some extent, this appeared to be governed by the way in which goods were offloaded, for example, through specific retailers, although this was also dependent on the nature of goods to sell: "*As 2/3 in the morning, can't get* rid of it then, laptop shops etc." (Participant Three). Conversely, other offenders in the sample reported how the time of day had little impact on this process; this appeared to

be dependent on offenders' means for selling on stolen items and the way in which these were disposed of: "*Always sell on. Too 'hot'. Don't keep 'owt from burglaries. 30* mins/half hour to get rid - hour at most. Go to people on way home. Even at 3 or 4 in the morning" (Participant Nine). As such, this work highlights not only the speed in which offenders are able to offload stolen goods, but also the 24-hour nature of the stolen goods market (Sutton, 2008).

Nevertheless, what this research raises is the quandary faced by steal-to-order offenders; whilst having a buyer already lined up provides greater security as to a guaranteed sale, this may limit the flexibility with which offenders have to sell on goods around the clock, as it is the buyer who will ultimately govern when this will take place. This also presented as an issue for those who would steal-to-offer, who may be forced to stash goods so that they could sell these during business hours: "Also take goods to pawn shops and pubs. Landlords know people who will buy it, or they will buy it themself. Keep stash elsewhere" (Participant One). Having a buyer already lined up may also limit offenders' ability to negotiate on price for goods stolen, as this limited any potential competition between would-be buyers, subsequently restricting any bargaining power that may otherwise have been held by offenders.

#### Sense of professionalism

Finally, what emerged during interviews was the degree of professionalism exhibited by offenders during the course of steal-to-order offences. This included 'blending in' to their surroundings to minimise their risk of detection: "It is all about not being out of

place" (Participant Two) or: "I will try and blend in, if no-*one thinks I'm out of place* there, dress smart, not be shifty/suspicious" (Participant 12). This supports the work of Cromwell and Olson (2005), who highlight the importance of not standing out during burglary offences to help evade detection.

A further method adopted by offenders during the offending process was the use of tools to access a property. However, offenders recognised the dangers of carrying tools with them; this referred to the risk of being caught in possession with tools that may be used to help facilitate a burglary offence, resulting in a subsequent conviction for 'Going equipped for stealing' under the Theft Act 1968. Offenders described how they would often attempt to access a property without the use of tools, or how they could often access such tools through the gardens of properties (or nearby properties) they were looking to target: "Sometimes something [other tools] in the garden they can use - if not, then next door etc." (Participant Ten) or: "Brickwork - shops and car washes etc., estate agents, lump hammer and chisel. Within 10 gardens, always a tool you can use" (Participant Four). This demonstrates a clear opportunity for crime prevention efforts amongst local residents, to ensure there are no 'facilitatory resources' available that may support an offender's efforts (Ekblom and Tilley, 2000).

Offenders also demonstrated an awareness of police movement during their offences, which they used to support their evasion of the police: "[Aware of police movement?] *Yes. Had police scanners, before they went digital. Listen for 'XRAY99'* [helicopter], also listen out for animal section" (Participant 14). As such, this indicates the sophistication of techniques utilised by offenders to help evade detection by the police,

and supports previous work that highlights the professionalism exhibited by offenders during the completion of their offences (Clare, 2011; Nee, 2015).

During interview, offenders described the operations that supported the facilitation of stealing and offloading of cars to order. In particular, this involved the replacing of number plates from stolen vehicles with number plates from matching make and models of cars. Often, offenders would research the details of matching number plates (and create replica plates) in advance of an offence, so that they were able to 'plate up' immediately following the offence: "Originally - steal and plate them up - same *spec...nick car* - that night, [get] plate details - that day" (Participant 15), and: "Took plates, cordless drill - carry with it [So could plate there and then]" (Participant 13). This latter quote demonstrates the level of planning involved in such offences. The same offender described how he would only replace number plates once ANPR technology<sup>7</sup> had developed: "Before ANPR came in - *didn't bother* [plating up]" (Participant 15). This helps illustrate one of the ways in which offenders have adopted their practices in line with technological advancements, to help facilitate their offences and evade detection by the authorities.

One offender discussed this process in detail, describing how he would utilise existing websites to facilitate the transition of number plates from matching 'legitimate' (insured) vehicles, to stolen vehicles, so as not to arouse suspicion by the authorities. Specifically, the offender described checking for number plates of existing vehicles that were the same make, model and colour of vehicles that had been stolen, using the 'Auto Trader' used-car sales website (where prospective sellers will often post pictures of cars

they are selling; these images often reveal the number plates of such vehicles). Once the offender had identified a number plate from a matching make and model of car, he would then check that the car to which those number plates were registered was insured and would not subsequently alert the authorities. To do this, he used the 'askMID.com' website, which is a motor insurance database, allowing users to check whether a vehicle is insured. The website was designed initially to assist motorists in checking the insurance details of other parties involved in a roadside collision (<u>www.askMID.com</u>, 2018). However, this service has subsequently been exploited by offenders to assist in the facilitation of offloading stolen vehicles. When used in conjunction, these two websites proved highly effective in supporting the construction of replica plates for stolen vehicles that would not arouse suspicion by the authorities: "[Number] Plates - go Auto Trader - see 30 mile radius - see cars. Also, go onto askMID.COM - make sure insured cars - *so don't flag up issues etc.*" (Participant 14). To the author's knowledge there have been no prior studies that have revealed this mechanism amongst offender groups.

The above example represents a clear opportunity for offenders to make use of existing databases to facilitate the effective disposal of stolen goods. However, this also represents a clear opportunity for specific intervention to disrupt this process. This may be achieved, for example, through introducing more stringent access on the askMID.com site. Anonymising the number plates of matching vehicles on the Auto Trader site would also mean that offenders were unable to access this information readily. Whilst it is acknowledged that offenders could still search for number plates of matching vehicles in

their local area, this would involve much greater effort on their part and be more timeconsuming, thus presenting a much lesser attractive option for offenders.

### **Discussion and Conclusion**

This paper has explored the nature and practices of offenders when committing steal-toorder offences. This research has illustrated how a number of behavioural features demonstrated during steal-to-order offences share parallels with current literature into burglary offenders/offences more generally; these include the nature of goods taken, the means of disposal, and the speed of disposal.

With regards to goods taken, technology, jewellery and cars were identified as the most popular items stolen during steal-to-order operations. Supporting Clarke's (1999) 'CRAVED' hypothesis, it is known by offenders that these items will command higher prices (Sutton, 2010), with smaller items also being concealable. Offenders reported that the most popular means of disposal was through a handler/buyer, as is consistent with previous research (Schneider, 2005); this was subsequently followed by a secondhand shop, which has previously also been recognised as an important avenue for disposal (Wright and Decker, 1994; Clare, 2011). As such, this paper highlights the value of both network sales and commercial fences in supporting the stolen goods market for steal-to-order offences. Interestingly, the offenders in the current sample reported engaging in steal-to-order offences during domestic rather than commercial burglary offences. Though there are similarities in the types of goods taken during domestic and commercial burglary offences (so-called 'hot' products; for example, jewellery or technology items), burglars engaging in commercial offences have the added benefit of being able to steal (more general) items 'in bulk'; for example, cigarettes (Sutton, 2008). Moreover, whilst both domestic and commercial burglaries recognise the value of commercial fences in offenders' disposal of goods (Sutton, 2008), the current work appears to place greater prominence on the role of network sales in supporting the selling of stolen goods from domestic burglaries. Nevertheless, this work found that offenders largely tended to dispose of goods within one or two hours following the offence, supporting previous work into the prompt disposal of goods amongst domestic and commercial burglars (Sutton, 1998; 2003; 2008).

This paper has also revealed a number of novel findings on the practices of steal-toorder offenders. Specifically, this paper has identified a behavioural continuum amongst those who engage in steal-to-order offences; those who steal-to-offer, those who steal more general items to order, and those who steal more specialist goods to order. The paper has also demonstrated the nature of professionalism exhibited by offenders during the course of steal-to-order offences, particularly in relation to the stealing of more specialist items. Nevertheless, it was recognised that for offenders who engage in stealto-order offences, there may be less flexibility with regards to the disposal of stolen items because of their commitment to one specific buyer.

What this research has also illustrated is how offenders who engage in steal-to-order offences are not a homogenous offender group. This paper has identified a spectrum of behaviour amongst burglars who engage in steal-to-order offences, akin to the apparent spectrum of professionalism exhibited by burglars (Maguire and Bennett, 1982; Nee

and Meenaghan, 2006). Specifically, this research has highlighted three broad groups who engage in steal-to-order offences, on a sliding scale of professionalism; those who steal-to-offer, those who steal-to-order more general items (such as laptops), and those who steal-to-order more specialist items. Such specialist items may include goods such as cars, or collectors' items, such as antiques. Though those questioned at the higher end of this spectrum predominantly targeted particular makes and models of cars over collectors' items (only one offender reported targeting antiques), specific collectors' items (such as antiques) remain a specialist item targeted by sophisticated offenders (who may engage in steal-to-order offences; Nee and Meenaghan, 2006). Nevertheless, it is anticipated that regardless of the nature of specialist items, a similar degree of research and preparatory work would be required to facilitate such offences, as was highlighted in the stealing of particular makes and model of vehicle. For example, the paper has revealed how steal-to-order offenders who stole cars demonstrated a rather sophisticated and professional setup, in which the stealing of cars is just one part of the process. Other steps in this process include the order being placed for cars, the locating of cars, the locating of legitimate replica number plates and the making up and attaching of replica plates, before selling on the vehicle to the buyer.

Interestingly, steal-to-order offenders who stole cars appeared to exclusively steal cars to order, whereas offenders who stole more general items appeared to be more flexible in what they did or did not steal-to-order (though there was no evidence to suggest that these groups crossed over). Furthermore, it appeared that offenders who stole more general items did not need to take as professional approach as those who stole cars. The process for these offences appeared to be less complex; receiving an order for goods, keeping an eye out for such items, and taking these as and when the opportunity arose. Further research to explore the nature of such a spectrum amongst this group will help to identify future opportunities for intervention. Moreover, future work to investigate the practices of offenders who steal collectors' items to order will help to establish whether the practices employed are similar to those targeting specific makes and models of car.

This work has also helped illustrate the potential lack of flexibility experienced by offenders with regards to committing to offload goods to one (or more) specific buyer(s). This may well cause difficulties for offenders with regards to offloading stolen items, as offenders may be unable to offload goods within the preferred timeframe of one or two hours. This holds substantial implications for understanding the incidence of criminal behaviour and decision making of offenders, as well as highlighting existing difficulties with criminological theory. For example, according to Routine Activities Theory (Cohen and Felson, 1979), a motivated offender will choose a suitable target to burgle, in the absence of a capable guardian. However, this theory, whilst acknowledging the role of offender(s) and victim(s), fails to acknowledge the role of the buyer of stolen goods. The opportunity (or lack of) for offenders to offload goods immediately after an offence may well impact on an offender's decision to commit an offence a specific point in time. Thus, essentially, offences such as burglary should be considered a two-stage process (Sutton, 2010); the stealing of goods, and the disposal of such items, which should both be taken into account when developing theory to understand (acquisitive) criminal behaviour. Within the context of steal-to-order offences, this could be extended to a three-stage process, incorporating the 'ordering of goods' as a preceding step to the offence stage.

Though this research has helped to reveal insights into the nature of steal-to-order offenders, it is acknowledged that with a sample size of 15 it remains difficult to generalise the findings. Enhancing the sample size would help to improve the reliability of the findings in future. In addition, increasing the breadth of the sample (i.e. through interviewing offenders from different geographical areas) will also help to enhance the representativeness of the findings. For example, this research found that the timing of burglaries was in some cases constrained by the routine activities of the potential buyers. Therefore, it may be that the timings and practices of offenders who steal-to-order are somewhat restricted by the nature of local markets in which they operate (Stevenson and Forsythe, 1998; Sutton, 2010). Incorporating offenders in the community in addition to those who are incarcerated may also help to improve the reliability offender accounts, to establish whether any aspect of offenders' accounts may reflect an element of bravado or post-degree rationalisation, as this presented a challenge with the current work.

## **Implications for crime prevention**

In terms of how this work may be applied to reduce crime, there appears greater scope to disrupt the process amongst those who steal cars to order, due to the precise nature of operations that underpin these offences. The potential intervention point here relates to the process of making up replica number plates. Whilst this may not prevent instances of crime from occurring per se, this will help to make it more difficult for offenders to successfully offload stolen cars and thereby successfully deliver the 'supply' element of this criminal market (in line with the Market Reduction Approach; Sutton, 1998). What this research has shown is how offenders may utilise online car sales sites as a means to identify the number plates for matching makes and models of cars to stolen vehicles, which, when used in conjunction with a website that can inform offenders whether a car is insured, can be used to support the production of replica plates to facilitate the process of offloading stolen vehicles.

As such, this paper demonstrates clear impact on public policy, through helping develop public understanding on the nature of mechanisms used by steal-to-order offenders to facilitate the offloading of stolen cars. Such understanding may be used by the public to ensure that any information they submit online relating to vehicles for sale are anonymised (including number plate information), in an attempt to try and disrupt this process. This research has also illustrated to organisations how their businesses may be exploited by offenders to facilitate the effective offloading of stolen cars, whilst highlighting a key opportunity for such organisations to take steps to restrict the ability for offenders to exploit loopholes in their systems for their own means. Such opportunity has clear potential across both a national and international scale. Increasing the level of security required to access information about whether a car holds valid insurance, as well as anonymising the number plate information from cars shown on online car sales websites, will help to disrupt this process. Such changes, if implemented, would help to make it more difficult for offenders to 'pass off' stolen cars as legitimate vehicles, and help to disrupt the stolen cars market.

Simple steps taken by residents may also help to reduce the ease with which steal-toorder offenders can operate; for example, ensuring no items that may be used as tools are left within gardens, thereby reducing the opportunity for offenders to successfully accomplish crimes. A further way in which residents may take steps to disrupt the operations of steal-to-order offenders is through considering Clarke's 'CRAVED' hypothesis (1999). Residents may support such efforts through taking steps to minimise the 'Removable' and 'Disposable' facets of this hypothesis. With regards to the 'Removable' facet, this may involve ensuring that valuable items are securely stored; whether this is through a lockable safe, or other secure storage unit. With regards to disrupting the 'Disposable' component, this would involve taking steps to help raise the difficulty encountered by offenders in successfully offloading stolen goods. This may involve activating tracking technology on items such as tablets, or smartphones, using secure passwords or encryption technology on phones/laptops (some may even have an auto-erase function after a number of failed sign-in attempts), or through using secure property marking. As such, this indicates how also taking small steps can help to disrupt/prevent somewhat sophisticated offenders, highlighting the importance of a coordinated effort in the fight against steal-to-order offending.

## Acknowledgements

This research was supported through an 'Innovations in Quantitative Methods' Scholarship from the University of Leeds. The authors are grateful to Professor David Best, Dr James Banks, and two anonymous reviewers for their helpful and constructive comments on an earlier draft of this paper. Thanks are also extended to HM Prison Service for enabling access to the offenders in this study, and, in particular, to the staff and prisoners who gave their valuable time in order to support this work.

#### Notes

1. Based on 2013/14 Crime Survey for England and Wales (Shaw et al, 2015).

2. The 'Market Reduction Approach' is a multi-disciplinary approach which seeks to reduce levels of acquisitive offending through the disruption of stolen goods markets (Sutton et al, 2001).

3. Offenders in the broader sample had an average age of 34 years, compared with an average age of 36 years in the current sub-sample, and held an average of 17 convictions for an estimated average of 73 burglary offences, compared with an average of 18 convictions, for an estimated average of 111 burglary offences.

4. At the time of an individual's arrest, they may be asked by the police to confess to any other similar offences, on the understanding that it will not be possible to prosecute the individual separately for these offences, but that they shall instead be taken into consideration at the time of sentencing for the original offence. Though it may be the case that a court will increase a sentence as a result of these TICs, these will usually be less severe than if they had been prosecuted separately for these offences (Sentencing Council, 2011).

5. Network sales relates to friends or contacts of an offender who they would draw on to either buy the stolen goods for their own (or to sell on themselves), or who would pass knowledge of the item's availability to their own contacts, until a buyer was found (Sutton, 2008).

6. Such offences are termed 'Hanoi' burglaries after 'Operation Hanoi', a West Yorkshire Police operation which was the first UK police operation targeting this particular type of offence (The Yorkshire Post, 2009).

7. Automatic Number Plate Recognition (ANPR) technology is used by law enforcement agencies across England, Wales, Scotland and Northern Ireland to help detect, disrupt and deter criminal behaviour across national, regional, and local levels (www.police.uk, 2018).

# References

Altheide, D.L. and Schneider, C.J. (2013) Qualitative Media Analysis. 2<sup>nd</sup> edition. Los Angeles: Sage Publications.

Armitage, R. (2006) Predicting and Preventing: Developing a Risk Assessment Mechanism for Residential Housing. Crime Prevention and Community Safety: An International Journal 8(3): 137-149. AskMID.com. (2018) Welcome to the askMID website. Motor Insurance Database, <u>http://www.askmid.com/</u>, Accessed 12 July 2018.

Bennett, T. and Wright, R. (1984) Burglars on burglary. Aldershot: Gower.

Bernasco, W. (2008) Them Again? Same-Offender Involvement in Repeat and Near Repeat Burglaries. European Journal of Criminology 5(4): 411-431.

Brantingham, P.L. and Brantingham, P.J. (1993) Nodes, Paths and Edges: Considerations on the complexity of Crime and the Physical Environment. Journal of Environmental Psychology 13: 3–28.

Clare, J. (2011) Examination of Systematic Variations in Burglars' Domain-Specific Perceptual and Procedural Skills. Psychology Crime & Law 17(3): 199–214.

Clarke, R.V. (1999) Hot Products: understanding, anticipating and reducing demand for stolen goods. Policing and Reducing Crime Unit Police Research Series Paper 112. London: Policing and Reducing Crime Unit, Home Office.

Clarke, R.V. and Cornish, D.B. (1985) Modeling Offenders' Decisions: A Framework for Research and Policy. Crime and Justice 6: 147-185.

Cohen, L.E. and Felson, M. (1979) Social Change and Crime Rate Trends: A Routine Activity Approach. American Sociological Review 44(4): 588-608.

Cromwell, P.F. and Olson, J. N. (2005) The reasoning burglar: Motives and decisionmaking strategies. In: P. Cromwell (ed.) In Their Own Words: Criminals on Crime (An Anthology). 4<sup>th</sup> edition. Los Angeles: Roxbury Publishing Company, pp. 42-56.

Cromwell, P.F., Olson, J.N. and Avary, D.W. (1991a) Breaking and entering: an ethnographic analysis of burglary. Studies in Crime, Law and Justice Volume 8. Newbury Park, London: Sage Publications.

Cromwell, P.F., Olson, J.N., Avary, D.W. and Marks, A. (1991b) How Drugs Affect Decisions by Burglars. International Journal of Offender Therapy and Comparative Criminology 35(4): 310-321.

De Haan, W. and Vos, J. (2003) A crying shame: The over-rationalized conception of man in the rational choice perspective. Theoretical Criminology 7(1): 29-54.

Elffers, H. (2010) Misinformation, misunderstanding and misleading as validity threats to offenders' accounts of offending. In: W. Bernasco (ed.) Offenders on Offending: Learning about crime from criminals. Cullompton: Willan Publishing, pp. 13-22.

Ekblom, P. and Tilley, N. (2000) Going Equipped: Criminology, Situational Crime Prevention and the Resourceful Offender. British Journal of Criminology 40: 376-398.

Fox, B.H. and Farrington, D.P. (2012) Creating Burglary Profiles Using Latent Class Analysis: A New Approach to Offender Profiling. Criminal Justice and Behavior 39(12): 1582-1611.

Levesley, T., Braun, G., Wilkinson, M. and Powell, C. (2004) Emerging methods of car theft - theft of keys. Home Office Findings 239. Research, Development and Statistics Directorate. London: Home Office.

Maguire, E.M.W. and Bennett, T. (1982) Burglary in a dwelling: the offence, the offender and the victim. London: Heinemann Educational Books.

Markson, L., Woodhams, J. and Bond, J.W. (2010) Linking serial residential burglary: comparing the utility of modus operandi behaviours, geographical proximity, and temporal proximity. Journal of Investigative Psychology and Offender Profiling 7(2): 91-107.

Nee, C. (2015) Understanding expertise in burglars: From pre-conscious scanning to action and beyond. Aggression and Violent Behavior 20: 53–61.

Nee, C. and Meenaghan, A. (2006) Expert decision making in burglars. British Journal of Criminology 46(5): 935–949.

Nee, C. and Taylor, M. (1988) Residential Burglary in the Republic of Ireland: A Situational Perspective. The Howard Journal of Criminal Justice 27(2): 105–116.

Police.uk. (2018) Automatic Number Plate Recognition. *Police.uk website*, <u>https://www.police.uk/information-and-advice/automatic-number-plate-recognition/</u>, Accessed 10 July 2018.

Sanders, A.N., Kuhns, J.B. and Blevins, K.R. (2017) Exploring and Understanding Differences between Deliberate and Impulsive Male and Female Burglars. *Crime & Delinquency* 63(12): 1547-1571.

Schneider, J. (2005) Stolen Goods Markets: Methods of Disposal. British Journal of Criminology 45(2): 129–140.

Sentencing Council (2011) A short guide - Sentencing for offences taken into consideration (TICs), <u>https://www.sentencingcouncil.org.uk/wp-</u> <u>content/uploads/public\_guide\_tics\_for\_web.pdf</u>, Accessed 10 August 2018.

Shaw, O., Morgan, N., Mineva, I., Hoare, J. and Stevenson, R. (2015) Crime and the value of stolen goods. Research Report 81. London: Home Office.

Shaw, S.E., Smith, L.L. and Bond, J.W. (2010) Examining the factors that differentiate a car key burglary from a regular domestic burglary. International Journal of Police Science and Management 12(3): 450–459. Shover, N. (1973) The Social Organization of Burglary. Social Problems 20(4): 499– 514.

Stevenson, R., and Forsythe, L. (1998) The Stolen Goods Market in New South Wales: An Interview Study with Imprisoned Burglars. Sydney: NSW Bureau of Crime Statistics and Research.

Sutton, M. (1998) Handling Stolen Goods and Theft: A Market Reduction Approach. Home Office Research Study 178. Research, Development and Statistics Directorate. London: Home Office.

Sutton, M. (2003) How Burglars and Shoplifters Sell Stolen Goods in Derby: Describing and Understanding the Local Illicit Markets. Derby: Derby Community Safety Partnership.

Sutton, M. (2008) How Prolific Thieves Sell Stolen Goods: Describing, Understanding, and Tackling the Local Markets in Mansfield and Nottingham: A Market Reduction Approach Study. Internet Journal of Criminology, <u>https://docs.wixstatic.com/ugd/b93dd4\_8d5e20eeba8249d6831917733362afcc.pdf</u>, Accessed 2 July 2018.

Sutton, M. (2010) Stolen Goods Markets. Problem-Oriented Guides for Police. Problem-Specific Guides Series Guide No. 57. U.S. Department of Justice: Office of Community Oriented Policing Services.

36

Sutton, M., Schneider, J. and Hetherington, S. (2001) Tackling Theft with the Market Reduction Approach. Home Office Crime Reduction Research Series Paper No. 8. London: Home Office.

Taylor, E. (2014) Honour among thieves? How morality and rationality influence the decision-making processes of convicted domestic burglars. Criminology & Criminal Justice 14(4): 487–502.

The Yorkshire Post. (2009) Gang jailed for £600,000 car raids on homes. 28 March 2009, <u>https://www.yorkshirepost.co.uk/news/gang-jailed-for-163-600-000-car-raids-on-homes-1-2340404</u>, Accessed 2 January 2019.

Theft Act 1968. (c.60). London: Her Majesty's Stationery Office.

Townsley, M., Birks, D., Bernasco, W., Ruiter, S., Johnson, S.D., White, G. and Baum, S. (2015) Burglar Target Selection: A Cross-national Comparison. Journal of Research in Crime and Delinquency 52(1): 3-31.

Vandeviver, C., Neutens, T., van Daele, S., Geurts, D., & Vander Beken, T. (2015) A discrete spatial choice model of burglary target selection at the house-level. Applied Geography 64: 24-34.

Vaughn, M.G., Delisi, M., Beaver, K.M. and Howard, M.O. (2008) Toward a quantitative typology of burglars: A latent profile analysis of career offenders. Journal of Forensic Science 53(6): 1387-1392.

Wright, R. and Decker, S. (1994) Burglars on the job. Boston: Northeastern University Press.

Wright, R., Logie, R.H. and Decker, S.H. (1995) Criminal Expertise and Offender Decision Making: An Experimental Study of the Target Selection Process in Residential Burglary. Journal of Research in Crime and Delinquency 32(1): 39–53.

# <TABLE 1>

Goods	Ν	%
Technology (laptops, computers, phones)	7	47
Jewellery	7	47
Cars	6	40
Bikes	1	7
Power tools	1	7
Antiques	1	7

 Table 1. Stolen-to-order goods targeted.

# <TABLE 2>

Method of disposal	N	%
To a handler/buyer	14	93
Second-hand shops	5	33
Public houses	4	27
Jewellery shops	2	13
Online	2	13
Market sellers	2	13

 Table 2. Preferred methods of disposal.

# <TABLE 3>

Time taken	N	%
Within 1 hour	10	67
Within 2 hours	4	27
Half day	0	0
Day	0	0
2 days	1	7

**Table 3.** Time taken to dispose of goods.