

## Value Chain Matrix for Gold

Source Country	Extraction Points	Internal Marketing	Domestic Exit Points	Export Destination	Processing & Refining	Primary Retailer
<b>Colombia:</b>  Gold Belts: <b>Segovia Belt</b> <b>Choco Belt</b> <b>Middle</b> <b>Cauca Belt</b> <b>Antioquia</b> <b>Batholith</b>	<b>Antioquia Department</b> (most illicit mining occurs in this region) – Segovia, Buritica, El Bagre, Zaragoza, Nechi, <b>Rionegro, Venecia, Anori, Yarumal, Titiribi,</b> <b>Caldas Department-</b> Marmato, <b>Choco Department</b> (Urabenos most prominent here <sup>i</sup> ) <b>Valle del Cauca Department</b> <b>Risaralda Department –</b> Quinchia <b>Guainia department</b> <b>Tolima Department –</b> La Colusa <b>North Santander Department</b> Gramalote <b>Cauca Department</b> Suarez <b>Amazonas Department</b> <b>Caqueta Department</b> <b>Cordoba Department</b> <b>Huila Department</b> <b>Santander Department</b> <b>Narino Department</b> <b>Huila Department</b> <b>Putumayo Department</b>	<b>*Traders:</b> Barranquilla: PraxIT Ltd. – Contact: Dao Hawkins <sup>iv</sup>  Bogota: Serexoil Naesk PLC- Contact: Jose Ignacio Pena Castellanos <sup>v</sup> Ro-Ma Commodities – CEO: Wilson Rodriguez <sup>vi</sup> Villegas y Cia. – CEO: Carlos Villegas <sup>vii</sup>  Medellin: EJM Ingeniera Ltda <sup>citation needed</sup> Dimco – CEO: Sebastian Ospina <sup>viii</sup>  Pereira: Torres & Torres – CEO: Noberto Torres <sup>ix</sup>  <b>Smuggled INTO Colombia from:</b> Venezuela <sup>xi</sup> Panama <sup>xi</sup> Mexico <sup>xi</sup> Chile <sup>x</sup>  <b>Issues:</b> Extortion by criminal/armed groups	<b>Esmeraldas Province:</b> border smuggling into Ecuador then out of Ecuador on commercial air flights <sup>xi</sup>  <b>Air Transport:</b> Illegal gold transferred via air with legal documents  Corrupt politicians/judges allow for illegal transport/don't prosecute	<b>*Official export data (2014):</b> USA (63%) <sup>xiii</sup> Switzerland (34%) <sup>xiii</sup> India (2%) <sup>xiii</sup> Turkey (0.23%) <sup>xii</sup>  <b>Illicit known to go to:</b> Miami, Zurich, Rome, Dubai  <b>Exporters:</b> (play crucial role by introducing illegal gold into legal market) Goldex <sup>xiii</sup> Giraldo y Duque <sup>xiv</sup> →Most exporters based in Medellin, closer to mines	<b>US:</b> Republic Metals Corp. (receive 40% of gold) <sup>xvi</sup> ; Metalor Technologies USA <sup>xvi</sup> – linked to Goldex Case  <b>Switzerland:</b> Metalor (receive 20% of gold) <sup>xv</sup>  <b>UAE:</b> Kaloti <sup>xvi</sup>  <b>Italy:</b> Itaipreziosi <sup>xvi</sup>  <b>India</b>	<b>Unknown</b>  <b>Uses:</b> Banks Jewelers Electronic s

	<p><b>ASM:</b> Drug traffickers, terrorist organizations, Paramilitary groups ~80% of gold exported<sup>ii</sup></p> <p><b>LSM:</b> Canadian: Atico<sup>iii</sup>; Gran Colombia; Continental Gold<sup>iii</sup>; Colombian Mines Corporation; Batero<sup>iii</sup>; B2Gold<sup>iii</sup>; Sunward Resources; Bellhaven; Eco Oro<sup>iii</sup>; Seafield<sup>iii</sup>; Red Eagle Mining<sup>iii</sup></p> <p>Colombian: Mineros SA, Minincol, Torrebruma &amp; Realmonte (both owned by Pedro Rengel)<sup>citation needed</sup></p> <p>South African: AngloGold Ashanti (ASA)</p>	Fake intermediaries and front companies supply illegal gold				
<p><b>DRC:</b> <i>Eastern:</i> <b>North Kivu</b> <b>South Kivu</b></p>	<p><b>Illicit Mining Locations:</b> <b>North Kivu</b> Ping Lubero Beni</p>	<p><b>Illicit Gold Market Locations:</b> <b>North Kivu:</b> Manguredjipa Kasugho</p>	<p><b>*Airport:</b> New CongoCom Air (owner Evariste Shamamba)</p>	<p><b>Uganda:</b> Kampala<sup>xxiii</sup>, Ariwara<sup>citation needed</sup></p>	<p><b>*Refiners:</b> <b>UAE: Dubai</b> <b>Switzerland</b></p>	<p><b>Swiss Banks:</b> UBS<sup>xxviii</sup>, Credit Suisse<sup>xxviii</sup></p>

<b>Katanga Maniema</b>	Rutshuru Walikale	Bunyatenge Ndjingala Mubi	<b>*Border Crossings:</b> Uvira → Bujumbura, Burundi	<b>Burundi:</b> Bujumbura <sup>xxiii</sup>	mostly sent to UAE, but some may still go to Switzerland	<b>UAE:</b> Dubai souks <sup>xxviii</sup>
<i>Oriental Province:</i> <b>Ituri</b>	<b>South Kivu</b> Shabunda Kalehe Mwenga Fizi	Kibua Butembo Goma	Bungana → Kisoro, Rwanda	<b>South Sudan:</b> Juba		
	<b>Maniema</b> Punia Lubutu Maiko National Park	<b>South Kivu:</b> Mulungu Bukavu Uvira	<b>*Exporters by location:</b>	<b>Tanzania:</b> Kigoma, Dar Es Salaam	<b>Others linked to DRC illicit gold:</b>	<b>Users:</b>
	<b>Katanga</b> Kalemie Mitwaba Pweto Maelmba Nkulu Manono	<b>Maniema:</b> Salambila Bikenge	<b>Kinshasa:</b> SatisRessources Centauris Metal Aurum Eda Velma	<b>Rwanda:</b> Kisoro <sup>xxiii</sup>	Almalyk Mining and Metallurgical Complex; Asaka Riken Co Ltd.;	Banks <sup>xxviii</sup> Electronic S <sup>xxviii</sup> Dentistry <sup>xxvii</sup>
	<b>Ituri</b> Irumu Mambasa	<b>Ituri:</b> Djallasiga <sup>xviii</sup> Aru <sup>xviii</sup>	<b>Bukavu:</b> DTA Mining Congo Namukaya Cavichi	<b>Kenya</b> <sup>xxi</sup>	Bangko Sentral ng Pilipinas; Caridad; Cendres & Métaux SA; Chugai Mining; Colt Refining; Daejin Indus Co. Ltd.;	Jewelers <sup>x</sup> <sup>xviii</sup>
	<b>Armed Groups in control of mining sites:</b>	<b>*Trading Companies:</b> Farrel Trade & Investment Corporation & Machanga Ltd. (both owned by Rajendra Vaya Kumar. His trading associates are Jigar Kumar, Jamnadas Vasanji Lodhia and his son Kunal); Ntakangwa Mining (Burundi - owned by Mutoka Ruganyira);	<b>Kisangani:</b> Metal Arum Centauris Eda Velma Divas <b>Butembo:</b> Glory Minerals	<b>*Airport:</b> Entebbe Airport, Uganda <sup>xxii</sup>	Do Sung Corp.; FSE Novosibirsk Refinery; Hwasung CJ Co. Ltd.; Inner Mongolia Qiankun Gold and Silver Refinery Share Co. Ltd.;	<b>India &amp; China:</b> A significant amount of manufactur ing is done in India and China for sale to jewelry manufactur ers and retailers in the US and Europe. <sup>xxv</sup>
	<b>North Kivu:</b> FARDC; FDLR; (Leader: Sylvestre Mudacumura); Mai Mai/Sheka aka NDC (Leader: Sheka Ntabo Ntaberi);		<b>Bunia:</b> MetauxPrecieux	<b>Exporter, Sibtein Alibhai –</b> considered to be a key channel behind illicit gold exports from Africa and Dubai. Owns AR Gold, Alfa Gold (DRC), Alfa Gold Corp (Dubai) & Alfa Gems Corp (Mozambique) <sup>xxiii</sup>		

	<p><b>South Kivu:</b> FARDC; Raia Mutomboki; Mai Mai Yakutumba; FDLR</p> <p><b>Katanga:</b> FRPI FARDC Mai Mai Bakata Katanga</p> <p><b>Maniema:</b> FARDC; Mai-Mai Simba (General Mando)</p> <p><b>Ituri:</b> FRPI FARDC Mai Mai Bakata Katanga</p>	<p>Silver Minerals (Uganda owned by Madadali Sultanali Piran); Mineral Impex Uganda (associated with Rajendra Vaya Kumar); Mining Congo;</p> <p><b>*Trading Companies:</b> Glory Minerals<sup>xx</sup>; AR Gold - (owned by Sibtein Alibhai)<sup>xix xx</sup>; Etablissement Namukaya aka Congocom (owned by Evariste Shamamba)<sup>xvii</sup> Midas All Minerals (owned by Sameer Bhimji)<sup>xviii</sup></p> <p><b>Conflict-Free Trading companies:</b> Banro Corporation<sup>xxi</sup>; AngloGold Ashanti/ Randgold Resources<sup>xix</sup></p>	<p><b>*Exporters tied to DRC gold:</b></p> <p><b>Uganda:</b> Westcorp Mining<sup>xxii</sup>; Treasure Highland Caves<sup>xxii</sup></p> <p><b>Kenya:</b> Skyhawk International Ltd.<sup>xxii</sup>; Ushindi Exports Ltd.<sup>xxii</sup></p> <p><b>Burundi:</b> Berkenrode (owned by Mutoka Ruganyira who is associated with Rajendra Kumar)<sup>xxii</sup>; Golden Gold (owner- Karim Somji, exports on behalf of AR Gold, owner - Sibtein Alibhai)<sup>xxii</sup>; SCEEMB<sup>xxii</sup>; Ntakangwa Mining<sup>xxii</sup>; Etablissement Jean-Jbeili<sup>xx</sup></p>		<p>Jiangxi Copper Company Ltd.; Korea Metal Co. Ltd.; Kyrgyzaltyn JSC; Lingbao Jinyuan Tonghui Refinery Co. Ltd.; Moscow Special Alloys Processing Plant;</p> <p><b>Others linked to DRC illicit gold:</b> Navoi Mining and Metallurgical Combinant; OJSC Kolyma Refinery; Prioksky Plant of Non-Ferrous Metals; Sabin Metal Corp; SAMWON METALS Corp.; So Accurate Group, Inc.; SOE Shyolkovsky Factory of Secondary Precious Metals;</p>	
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					The Great Wall of Gold and Silver Refinery of China; Tongling nonferrous Metals Goup Co., Ltd; Torecom <sup>xxiv</sup>	
<p><b>Ghana:</b></p> <p><b>Note:</b> Ghana's gold belt encompasses the Eastern portion of the country, cities include: Bolgatanga, Wa, Cape Coast, Accra, Sunyani, Kumasi, Sekondi-Takoradi</p> <p><b>Mines:</b></p>	<p><b>Regions</b> Kyebi East Region Offin River Central Region Birim River Kibi Township</p> <p><b>Towns</b> Dunkwa-on-Offin Twifo Praso Bempong Agya Appiah Nikwanta Kyekeyewere Diaso Bawdie Bibiani Tarkwa Obuasi Prestea Dumasi Jacobu</p>	<p><b>*Traders:</b></p> <p><b>Greater Accra:</b> Ghana Gold Trading Center<sup>xxix</sup> Jopaf Gold Limited<sup>xxx</sup>; Ghana Gold Pure<sup>xxxiii</sup>, Soda Ice<sup>xxxiii</sup>; Africa Gold Brokers Consult Ltd.<sup>xxxiii</sup>, Commerz General Ghana Ltd.<sup>xxxiii</sup>, Deco Metal Miners Ghana Ltd.<sup>xxxiii</sup>, EMCIP Towers Ltd.<sup>xxxiii</sup>, Harbour Equity Partners (exports to US market)<sup>xxxiii</sup>, Impex Gold Company Ltd. (buys direct from local miners, local kings and authorities)<sup>xxxiii</sup>, Jopaf Gold Limited (buy from small scale miners, export to US, Japan,</p>	<p><b>Transport:</b> Kotoka International Airport (exporting gold without official documentation is daily occurrence)<sup>xxxiii</sup></p> <p><b>Ghana Imports Gold from:</b> Guinea (98%)<sup>xxxvii</sup> Benin (1.6%)<sup>xxxiv</sup></p>	<p><b>*Official export data:</b> Switzerland (69%)<sup>xxxv</sup> India (25%)<sup>xxxviii</sup> Australia (4.8%)<sup>xxxviii</sup> United States (0.5%)<sup>xxxviii</sup></p>	<p><b>Switzerland:</b> PAMP<sup>xxxix</sup>, Metalor<sup>xxxix</sup></p> <p><b>UAE:</b> Kaloti Jewelry International<sup>xxxix</sup>, Emirates Gold<sup>xxxix</sup></p> <p><b>South Africa:</b> Randgold<sup>xxxix</sup></p> <p><b>India:</b> Kundan<sup>xxxvi</sup></p>	<p><b>Unknown</b></p> <p><b>Uses:</b> Banks<sup>xxxix</sup>, Jewelers<sup>xxxix</sup>, Electronic<sup>xxxix</sup></p>

<p>Ashanti Goldfields' Obuasi mine produces over 50% of Ghana's gold</p> <p><b>Other mining sites:</b> Nkroful, Ashanti Iduapriem, Bibiani, Nsutu, Tarkwa, Bogoso, Akyempim, Kenyasi, Brong Ahafo, New Abirem, Ayanfuri, Nkwakaw</p>	<p><b>Government owned:</b> PMMC – POSSIBLE good pressure point due to control of other companies</p> <p><b>*Smaller Companies:</b> Geodrill Ltd.; Hagnela Mining Company Ltd.; Kwalas Mining Enterprise; La Source Development, Nana Adaku Adai Mining Group, Red Back Mining, Adamus, Chirano, Ghana Manganese, Goldfields, Golden Star, Newmont, Perseus</p> <p><b>Issues:</b> 90% of Ghana's gold mines are not formalized and operate illegally<sup>xxvi</sup></p> <p>Police corruption – being paid off by illegal miners<sup>xxvii</sup><sup>additional citation</sup></p> <p>Only Ghanaians can get licenses for small-scale</p>	<p>Korea, Australia, UK, Switzerland, France, Israel)<sup>xxxiii</sup>;</p> <p>Karmans Holdings Ltd<sup>xxxiii</sup>;</p> <p>Keegan Resources<sup>xxxiii</sup>;</p> <p>West Africa Precious Metals (WAPMIDA)<sup>xxxiii</sup>;</p> <p>Niza Mining Group<sup>xxxiii</sup>;</p> <p>Spongy Gold<sup>xxxiii</sup></p> <p><b>Ashanti:</b> Obausidia Gold Mining Limited<sup>xxxiii</sup>;</p> <p>Maxcue Company Ltd.<sup>xxxiii</sup></p> <p><b>Kumasi:</b> Solid Rock GH Ltd.<sup>xxxiii</sup></p> <p><b>Kaso:</b> Christian Quao<sup>xxxiii</sup></p> <p><b>Nkwakaw:</b> Purity Gold Limited<sup>xxxiii</sup></p> <p><b>Tarkwa:</b> Mospacka Gold Ltd.<sup>xxxiii</sup></p> <p><b>Unknown:</b> E-Aryeetey Enterprise<sup>xxxiii</sup></p> <p>Kobiprime Enterprises<sup>xxxiii</sup></p>				
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	<p>gold mining → Tension between local people and foreign workers can lead to violence<sup>xxviii</sup></p>	<p><b>Four largest exporters:</b>  AA Minerals<sup>xxxiv</sup>  Asanka<sup>xxxiv</sup>  Asap Vasa<sup>xxxiv</sup>  Guldrest<sup>xxxiv</sup></p> <p>Many gold buying agents loan <i>galamseys</i> money/equipment<sup>xxxv</sup></p> <p>PMMC (has about 700 licenses buying agents)– no procedures around human right criteria when buying<sup>xxxii</sup></p>				
<b>Peru</b>	<p><b>Mining Towns:</b>  Madre de Dios  Puno  Arequipa<sup>xxxvii</sup></p> <p><b>*Mining companies:</b>  Empresa Minera Especial Tintaya<sup>xli</sup>;  Suwit Mining Company<sup>xli</sup>;  Hydrocarbons<sup>xxxviii</sup>;</p> <p>In some areas, Russian, Chinese and Brazilian armed groups purchase</p>	<p><b>Trade Center:</b>  Cusco</p> <p><b>Trade Companies under investigation:</b>  Minera Tambopata SAC<sup>xliv</sup>;  Minerales del Sur<sup>xliv</sup>;  Information-stelle Peru e.V.<sup>xliv</sup>;  E&amp;M Company SAC: (Owned by Miguel Zinanyuca)<sup>xliv</sup>;  Universal Metal Trading (Director: Luis Zavaleta Vargas)<sup>xliv</sup>;</p>	<p><b>Lima, Peru (air); Callao, Peru (sea)</b></p> <p><b>Airports:</b>  Jorge Chávez Airport, Lima   Madre de Dios Airport</p> <p><b>Highways &amp; Border crossings for smuggling:</b>  Interoceanic Highway;</p>	<p><b>*Official export data<sup>xliv</sup>:</b>  South Africa (45%)  UAE (27%)  Switzerland (21%)  Hong Kong (2.8%)  Netherlands (2.3%)  Lebanon (1.3%)  Turkey (.93%)  India (.73%)</p>	<p><b>*Refiners:</b>  <b>US</b>  Atomic Gold<sup>xlix</sup>;  Republic Metals Corp.<sup>xlix</sup>;  NTR Metals<sup>xlix</sup>;  Kaloti Metals &amp; Logistic<sup>xlix</sup></p> <p><b>Canada</b>  Johnson Matthey<sup>xlix</sup></p> <p><b>Italy</b>  Italpreziosi S.p.A.<sup>xlix</sup></p>	<p><b>Unknown</b></p> <p><b>Uses:</b>  Banks  Jewelers  Electronics</p>

<p>concessions and force individuals to work.<sup>xxxix</sup></p> <p><b>Individuals involved in illicit mining:</b>  Oleg Lipin: owner of Empresa Minera y de Servicios Suwit S.A.C.<sup>xliii</sup>;  Gregoria Casas &amp; Casas-Baca family<sup>xliii</sup>;  Yi Yuanguang<sup>xliii</sup>;  and  David Ebenezer-George Boisson<sup>xi</sup></p>	<p>AS Peru &amp; CIA SAC<sup>xliiv</sup>;  Akam Asset<sup>xliiv</sup>;  Menor Gold Trading<sup>xliiv</sup>;  Los Poderosos<sup>xliiv</sup>;  Royal Gold<sup>xliiv</sup>;  Oro Fino<sup>xliiv</sup>;  Giovanni Gold<sup>xli</sup>;  Empresa Comercializadora de Minerales Rivero<sup>xliiv xliiv</sup>;  C.G. Koenig<sup>xliiv xliiv</sup>;  Mining &amp; Energy Solutions<sup>xliiv xliiv</sup>, Holding  Minero del Peru<sup>xliiv xliiv</sup>;  Ares Gold<sup>xliiv xlii</sup></p>	<p>Highway from Altiplano in Puno to Bolivia.<sup>xliii</sup></p>	<p><b>Switzerland</b>  Valcambi<sup>xlix</sup>;  Argor-Heraeus<sup>xlix</sup>;  PAMP (owner: MKS)<sup>xlix</sup>;  Metalor<sup>xliiv</sup></p>
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<sup>i</sup> Michael Lohmuller. "Arrests Point to Urabenos' Evolving Role in Colombia's Illegal Mining." Insight Crime, December 7, 2015; insightcrime.org/news-briefs/arrests-point-to-urabenos-evolving-role-colombia-illegal-mining [Accessed March 1, 2016]

<sup>ii</sup> Groups include: FARC, led by El Paisa; ELN; Los Urabenos gang, Rastrojos drug trafficking and paramilitary organization

<sup>iii</sup> "Placing Bets on Colombia." Mining.com, May 20, 2013; mining.com/web/placing-bets-on-colombia/ [Accessed April 21, 2016]

<sup>iv</sup> TradeKey, "PraxIt Ltd.," 2016; tradekey.com/company/PraxIT-Ltd-5094170.html [Accessed March 21, 2016]

<sup>v</sup> TradeKey, "NAESK PRD," 2016; tradekey.com/company/NAESK-PLC-6305459.html [Accessed March 21, 2016]

<sup>vi</sup> TradeKey, "Ro Ma Commodities," 2016; tradekey.com/company/RO-MA-COMMODITIES-5121820.html [Accessed March 21, 2016]

<sup>vii</sup> Go for World Business, "Villegas y Sia," 2016; colombia.go4worldbusiness.com/search/memberdetails.asp?objid=97037&objtype=ID [Accessed March 21, 2016]

<sup>viii</sup> TradeKey, "DIMCO," 2016; tradekey.com/company/dimco-873473.html [Accessed March 21, 2016]

<sup>ix</sup> TradeKey, "Torres and Torres Ltd.," 2016; tradekey.com/company/Torres-amp-Torres-LTDA-3566127.html [Accessed March 21, 2016]

<sup>x</sup> Andrew Willis. "Gold Trading Firm Probed in Colombia Cocaine Laundering Case." Bloomberg, May 26, 2016; bloomberg.com/news/articles/2014-05-23/gold-traders-investigated-in-colombian-cocaine-laundering [Access March 1, 2016]

<sup>xi</sup> Fabiola Torres Lopez. "Ecuador's dirty gold is transported to the US on commercial flights." *Ecuador Review*, September 1, 2015; ecuadorreview.com/in-depth-ecuador/investigations/ecuadors-dirty-gold-is-transported-to-the-us-on-commercial-flights/ [March 21, 2016]

<sup>xii</sup> The Observatory of Economic Complexity, "Colombia," 2016; atlas.media.mit.edu/it/profile/country/col/ [Accessed March 1, 2016]



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- <sup>xiii</sup> Elyssia Pachio. "Crime Ring Laundered \$1 Billion in Colombia Gold Exports." Insight Crime, January 19, 2015; [insightcrime.org/news-briefs/crime-ring-laundered-a-billion-in-colombia-gold-exports](http://insightcrime.org/news-briefs/crime-ring-laundered-a-billion-in-colombia-gold-exports) [Accessed March 1, 2016]
- <sup>xiv</sup> James Bargent and Michael Norby. "Blood gold: from conflict zones in Colombia to jewelry stores in the US." Al Jazeera, November 18, 2015; [america.aljazeera.com/articles/2015/11/18/blood-gold-colombia.html](http://america.aljazeera.com/articles/2015/11/18/blood-gold-colombia.html) [Accessed March 1, 2016]
- <sup>xv</sup> Oscar Castilla C., Nelly Luna Amancio and Fabiola Torres Lopez. "Tracing Latin America's Illegal Gold to the US." Insight Crime, August 5, 2015; [insightcrime.org/news-analysis/tracing-colombia-bolivia-ecuador-illegal-gold-to-us](http://insightcrime.org/news-analysis/tracing-colombia-bolivia-ecuador-illegal-gold-to-us) [Accessed March 21, 2016]
- <sup>xvi</sup> Ibid.
- <sup>xvii</sup> Ruben de Koning and the Enough Team, "Striking Gold: How M23 and its allies are infiltrating Congo's gold trade," Enough Project, October 2013; [enoughproject.org/files/StrikingGold-M23-andAllies-Infiltrating-Congo-Gold-Trade.pdf](http://enoughproject.org/files/StrikingGold-M23-andAllies-Infiltrating-Congo-Gold-Trade.pdf) [Accessed April 1, 2016]
- <sup>xviii</sup> Southern African Resource Watch (SARW). "Congo's Golden Web: the people, companies and countries that profit from the illegal trade in Congolese gold," SARW and OSISA, May 2014; [sarwatch.org/sites/sarwatch.org/files/Publications\\_docs/congogold3web.pdf](http://sarwatch.org/sites/sarwatch.org/files/Publications_docs/congogold3web.pdf) [Accessed April 1, 2016]
- <sup>xix</sup> Badilemba, F. & Lezhnev, S. Enough Project, "Congo's Conflict Gold Rush" [202015%20Congo%20Conflict%20Gold%20Rush%20reduced.pdf](http://202015%20Congo%20Conflict%20Gold%20Rush%20reduced.pdf) [Accessed March 1, 2016]
- <sup>xx</sup> Partnership Africa Canada, "All that Glitters is Not Gold"
- <sup>xxi</sup> Ruben de Koning and the Enough Team, "Striking Gold: How M23 and its allies are infiltrating Congo's gold trade," Enough Project, October 2013; [enoughproject.org/files/StrikingGold-M23-andAllies-Infiltrating-Congo-Gold-Trade.pdf](http://enoughproject.org/files/StrikingGold-M23-andAllies-Infiltrating-Congo-Gold-Trade.pdf) [Accessed March 21, 2016]
- <sup>xxii</sup> Partnership Africa Canada, "All that Glitters is Not Gold"
- <sup>xxiii</sup> Badilemba, F. & Lezhnev, S. Enough Project, "Congo's Conflict Gold Rush"
- <sup>xxiii</sup> Partnership Africa Canada, "All that Glitters is Not Gold"
- <sup>xxiv</sup> KEMET, "Conflict Minerals Disclosure," Rep. Washington, DC: United States Securities and Exchange Commission, 2015. Print.
- <sup>xxv</sup> Enough Team. "From Child Miner to Jewelry Store: The Six Steps of Congo's Conflict Gold," Rep. Enough Project. Enough Project, March 27, 2016.
- <sup>xxvi</sup> "Going for Gold – Short Documentary about Ghana's illegal mining." September 28, 2014. [youtube.com/watch?v=GxonRUAGc0I](http://youtube.com/watch?v=GxonRUAGc0I)
- <sup>xxvii</sup> Ibid.
- <sup>xxviii</sup> "The price of gold: Chinese mining in Ghana documentary – The Guardian Investigates." YouTube, April 24, 2013. [youtube.com/watch?v=ohrrE1rjzLo](http://youtube.com/watch?v=ohrrE1rjzLo).
- <sup>xxix</sup> "Ghana Gold Trading Center." Facebook. [facebook.com/Ghana-GOLD-Trading-Center-177041745684336/](https://facebook.com/Ghana-GOLD-Trading-Center-177041745684336/).
- <sup>xxx</sup> [businessghana.com/portal/directory/index.php?op=getSubDirectoryContents&category=Gold%20Mining&cat\\_id=14&subcategory=Gold%20Mining&id=136](http://businessghana.com/portal/directory/index.php?op=getSubDirectoryContents&category=Gold%20Mining&cat_id=14&subcategory=Gold%20Mining&id=136)
- <sup>xxxi</sup> Human Rights Watch, "Precious Metal, Cheap Labor"
- <sup>xxxii</sup> Ibid.
- <sup>xxxiii</sup> "Gold smuggling spikes as GRA seizes \$18m worth of the commodity." GhanaWeb, February 22, 2016. [ghanaweb.com/GhanaHomePage/business/Gold-smuggling-spikes-as-GRA-seizes-18m-worth-of-the-commodity-417690](http://ghanaweb.com/GhanaHomePage/business/Gold-smuggling-spikes-as-GRA-seizes-18m-worth-of-the-commodity-417690).
- <sup>xxxiv</sup> The Observatory of Economic Complexity, "Ghana," 2016; [atlas.media.mit.edu/en/profile/country/gha/](http://atlas.media.mit.edu/en/profile/country/gha/) [Accessed April 1, 2016]
- <sup>xxxv</sup> Ibid.
- <sup>xxxvi</sup> Human Rights Watch, "Precious Metal, Cheap Labor"
- <sup>xxxvii</sup> Wells, Miriam. "Breaking Down the Chain of Illegal Gold in Peru." Insight Crime, October 2013; [insightcrime.org/news-analysis/breaking-down-the-chain-of-illegal-peruvian-gold](http://insightcrime.org/news-analysis/breaking-down-the-chain-of-illegal-peruvian-gold) [Accessed February 10, 2016]

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<sup>xxxviii</sup> Carlson, Olivia, et al. "Land and Livelihoods: NGOs, Conflict, and Extraction in Peru," 2015;  
<https://digital.lib.washington.edu/researchworks/handle/1773/33277> [Accessed March 11, 2016]

<sup>xxxix</sup> Verite, "From the Field: Behind the Scenes of the Gold Report." September 2013; [verite.org/vision/september2013/fromthefield](http://verite.org/vision/september2013/fromthefield) [Accessed February 27, 2016]

<sup>xi</sup> Society for Threatened Peoples (STP), "The responsibility of the gold refineries in human rights violation and illegal activities in Peru."

<sup>xli</sup> Society for Threatened Peoples (STP), "The responsibility of the gold refineries in human rights violation and illegal activities in Peru."

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<sup>xlv</sup> Society for Threatened Peoples (STP), "The responsibility of the gold refineries in human rights violation and illegal activities in Peru."