Grant Thomas

Professor Friedman

Legal Systems Very Different from Ours

3.8.17

Legal Systems of Wine

Wine is one of the few perishable commodities that increases in value with age. Wine has been around for millennia, and has had pervasive popularity throughout history continuing today. A majority of modern wine is made from a species of grape vines known as Vitris vinifera. It was believed for a long period that all wine descended from a single species of vine. However, today it is known that many species of vine were indigenous to Europe that evolved separately from the wine believed to be the originator. [[1]](#footnote-1)

The first recorded wine law decreed by Domitian, the Roman Emperor from 81 A.D. to 96 A.D. The vine edict of Domitian in 92 A.D. banned the planting of any new vineyards and ordered “half the vineyards in Asia Minor and other provinces to be uprooted” in the Roman provinces. The vine edict was the only instance in which Domitian decreed a law that impacted the entirety of the Roman Empire. The intent of the law was to limit the amount of wine being grown in order to grow more crops, specifically cereals. Domitian intended to “eliminate mediocre vines occupying land that could be ploughed and would be better suited for cereal crops than wine-growing. However, the Edict was largely ignored in the Roman providences. The edict stayed in effect for 188 years until Emperor Probus repealed the measure in 280 A.D. [[2]](#footnote-2)

Wine became a commercial commodity during the Roman Empire. To demark wine from different regions, the Romans began to authenticate wine and prevent fraud by labeling the amphorae with series of numbers, letters, codes, logos, and drawings.[[3]](#footnote-3) These were marked on the casks shipped by the merchants during the Roman times. Wine produced in Rome proper was categorized into a hierarchical system. For example, wine from the Falerian region, which was produced on the slopes of Mount Falernus had three different classifications denoting the quality of the wine. First, the wine produced on the lower slopes of the mountain was known simply as Falerian wine. Wine produced on the middle slopes was known as Faustian Falernian wine. This wine was considered to be of higher quality than the wine produced on the lower slopes. Finally, the wine produced on the upper slopes of the mountain was known as Caucinian Falernian. Falerian wine was one of the most highly sought after wines in the Roman Empire.[[4]](#footnote-4) This wine was a white wine aged ten to twenty years known for its amber color. Romans were partial to sweet flavors and therefore waited a until late in the season to harvest the grapes at their ripest stage. Wines during this time were often very sweet and because of the high sugar content during fermentation were very alcoholic. Pliny noted that a cup of Falerian wine would catch fire if held too close to a candle. Due to the high alcohol content of these wines, some were able to be aged up to two-hundred years. White wines were considered superior during this time while red wines were usually served to the general populous and slave populations. [[5]](#footnote-5)

Wines from Greece were often highly sought after during the Roman Empire. However, during that time wine would often spoil during the long voyages across the Mediterranean. To keep the wine from spoiling, the Greeks would infuse the wine with pine resin, giving it a unique flavor. This technique was widely known and led to many merchants using pine resin to flavor wines from lesser regions in order to sell them for higher prices than they would normally be worth.[[6]](#footnote-6) Often times sugar was added during the fermentation process to increase the alcohol content. Lees, chalk, and marble dust were often added to combat the acidity. Warm water and even seawater was added to wine in some instances. Honey was often added to wine, sometimes in large quantities. As much as three kilograms could be added to a single twelve-liter batch. Even lead was used a sweetener. Wine counterfeiters would use a variety of these wine treatment techniques, and others such as smoke houses to mimic the effects of aging.[[7]](#footnote-7) This allowed counterfeiters to sell young wines for much greater prices.

During the Roman empire, historians such as Pliny the Elder complained about the abundance of counterfeit wines. The volume of counterfeit wine was so great that Pliny the Elder stated that even the nobility could not be assured that the wine they poured was genuine. During that time the poor and middle class of Rome had nearly unlimited access at local bars to a supply of the prestigious Falerian wine for unusually low prices.[[8]](#footnote-8) Wine fraud was punished in Rome under a system known as Furtum. The literal translation of Furtum today is theft. However, Furtum was a broad crime and encompassed the crime of fraud. The charge of fraud was known as Contrectatio. Contrectatio is translated roughly to handling. This broadly encompassed fraud. However, a more serious crime which only was charged if the perpetrator hard a requisite intent to defraud. This was known as Furtum Fraudulosa, which roughly translates to theft by fraud. Furtum and contrectatio were civil causes of action as opposed to criminal. Both required a requisite intention, sometimes described as animus furandi, in order for a Roman jury to punish the perpetrator. During this time, infantes, or young children, and furiosi, lunatics, were considered incapable of formulating the necessary intention and therefore could not commit furtum.[[9]](#footnote-9) Although wine fraud was well documented by historians of the time, it seems that because of the significant number of additives and wine treatments, selling fraudulent wine in Rome rarely was punished by their legal system.

After the fall of Rome, viticulture fell sharply and was not revived until Charlemagne united Europe around 800. The revival was sparked by the spread of Christianity throughout Europe. The church needed a daily supply of wine to celebrate the Eucharist.[[10]](#footnote-10) Monasteries spurred the wine revolution post Rome. These monasteries required two qualities of wine. One for the daily celebration of mass and for consumption by monks, and a higher quality to impress guests.[[11]](#footnote-11) Dom Perignon was a monk who began producing sparkling wine in what is today known as the Champagne region of France.[[12]](#footnote-12)

Medieval England became one of the first regions to regulate wine. Wine has a tendency to spoil. Wine merchants had a tendency to maximize profits. Understanding this dichotomy, Parliament first prohibited the sale of “corrupted wine” in 1266.[[13]](#footnote-13) Adulteration of wine became a serious offense. Those attempting to hide the fact that wine had turned to vinegar or make the wine last longer by adding chemicals were punished severely. The assize courts regulated the price of wine depending on its scarcity or abundance.[[14]](#footnote-14) Local authorities in London established laws for tavern owners prohibiting French, Spanish, and German wines from being cellared together. This was done to prevent potential for mixing wines or falsely representing them to consumers. When a producer or merchant was found to be selling fraudulent or corrupt wine, the authorities forced that seller to drink it all. In Medieval Germany sellers of fraudulent wine could suffer punishment ranging from branding to being beating, and in some instances even being hanging. [[15]](#footnote-15)

In France wine production was often anonymous, defined only by the area of origin. Wine at the time was mainly sold out of casks. It was not until the 1650’s after the perfection of corking that the glass bottle became a common practice in the production of wine. During the 1700’s the demand for wine dramatically increased. It was in such high demand, that wine producers sought to cheapen production by stretching their supplies with additives and dilutants.[[16]](#footnote-16) This practice continued for centuries until the 1870’s and 1880’s.

A similar problem plagued Italy. In 1716, Medici Grand Duke Cosimo II of Florence created geographic boundaries for Tuscan wine growing regions to protect consumers from fraudulent geographic claims. These denominations included famed Chainti and Carmignano regions. Producers and merchants were forbidden from using these geographical names unless their wine was made within the assigned areas. The public aim of these boundaries was to increase the quality of wine. However, they tended to increase the profits of some producers at the expense of others. The system of geographic boundaries for wine production continues to this day as a regulatory regime and a the most indicator of quality.[[17]](#footnote-17)

Advancements in science during the Enlightenment lead to a new occupation. Alchemists of sorts, chemists of the time began to produce wines from obscure items and chemicals. They became known as “wine doctors” Joseph Addison wrote of that some would use apples to make Champagne and sloe to make Bordeaux and sell these wines fraudulently on the market. In 1820, German chemist Friedrich Accum noted that wine was one of the commodities most at risk for being fraudulently manipulated and misrepresented. In 1833, the British wine writer Cyrus Redding stated that chemists were manipulating wine at alarming rates. These so called “wine doctors” eventually lead British Parliament to enact the Adulteration of Food and Drink Act of 1860. [[18]](#footnote-18)

Wine production had become more specialized, as producers of great wine began to label their wines and the regions from which they were from. Wine classifications in Bordeaux and Burgundy grew out of wealthy land owners desire to ensure continued profits. Many in France had begun to informally classify wine. However, in 1855, the Chamber of Commerce of Bordeaux created an official classification of wine of the region. However, in the 1870’s and 1880’s a vine infestation of phylloxera, a root-infesting pest, destroyed much of the vines in France. This became known as the French Wine Blight. Demand for wine skyrocketed leading to a significant amount of fraud. Vines that were more resistant to pestilence were imported from American and Alegeria. They were hastily replanted in disorganized fashion. Despite the attempt to meet the demand for French wine, many producers resorted to fraudulent methods of production such as fermenting other fruits along with grapes, adding significant amounts of water to wines, and adding sweeteners, alcohol, and other dilutants. [[19]](#footnote-19)

 The French government began to enact regulation for wine fraud and overproduction in 1907. It defined wine as a beverage made exclusively from fermentation of fresh grapes or grape juices, with the ingredients being water, alcohol, and dry extracts. It implemented grape harvest reporting requirements for producers of wine to limit overproduction. Finally, the major estates listed in 1855 came together in 1910 and began to fight fraud by forming the Syndicate of Defense. The syndicate of defense hired inspectors to find falsified wines and to prosecute the sellers of such wine. The falsifiers were either fined or imprisoned. Today producers of valuable wine often find themselves charged with finding and charging the sellers of counterfeits. The government began classifying all regions of the wine producers. They limited wine producers in those areas to selling wine labeled as such. These regions included Champagne, Cognac, Armagnac, and Bordeaux. Many were angered by the delineations of the regions. Specifically, violent riots erupted in Champagne region around 1911. [[20]](#footnote-20)

After the French government classified the region of Champagne, people in the region began feeling significant malcontent. The production of Champagne at the time was largely in the hands of producers who purchased grapes from independent growers. Although today some of those growers produce wines under their own labels, then the producers did not have the capital to produce the wine. After the French Wine Blight, producers began looking for cheaper grapes outside of the region. During that time if a grower of grapes did not sell his grapes he had no recourse and nearly no opportunity to receive income. Champagne producers colluded to drive the price of grapes below the market price in order to maximize their profit. The producers hired operative, or agents known as commissionaires, to negotiate pries with growers. The commissionaires were paid in relation to the price they could negotiate to purchase the wine. Some commissionaires openly sought bribes, often in the form of extra grapes which they would sell themselves for profit. The price of grapes dropped dramatically, rarely covering the cost of farming. Poverty in the region became widespread. In January of 1911, Champenois vine growers intercepted trucks with grapes from Loire Valley, another region outside of Champagne, and tossed the grapes into the River Marne. The rioters continued to the warehouse where they tossed more wine and barrels into the Marne. The mob then descended on the city of Ay. Homes and Champagne houses were looted and ransacked. Fire was set and the city burned.[[21]](#footnote-21) The French government sent 40,000 troops to the region. Garrisons were deployed to every village in the region. The riot was eventually quelled, however, malcontent continued in this region only to be eventually dissipated by World War I. [[22]](#footnote-22)

France’s wine statutes eventually culminated in 1935 with the Appellations d’Origine Controlees (AOC). This statute distinguished quality wines from every region of France. The system set out areas of production, choice of grape varieties, minimum alcohol levels, growing methods, and winemaking techniques required for regions and their wines. The classification system began with only 10% of French wine being labeled as AOC, however, by the 1960’s over 40% of the wine in France was classified under the label. [[23]](#footnote-23)

The modern world has many regulatory bodies that protect wine producers from fraud. The European Union has significant regulations including the Common Agricultural Policy, which regulates the maximum vineyard surface allowed to individual EU member states, allowed winemaking practices, and principles for wine classifications and labeling. The French AOC system still is in control of professional wine produces in France today. In the United States wine is protected by the Bureau of Alcohol, Firearms, Tobacco, and Explosives.[[24]](#footnote-24) Furthermore, the American Viticulture Association also protects wine labeling practices today. The laws associated with this body require that at least 75% of the grapes used to produce the wine must come from the area where the wine is produced. California and Texas have wine laws increasing that requirement to 100% and 85% respectively.[[25]](#footnote-25) Today, wine label fraud is common, and it is believed that 5% of all wines sold are counterfeit or illegally labeled. [[26]](#footnote-26)

Label fraud first became popular after the French Wine Blight. Wines from lesser regions of France, such as Southwest France or Calabria, Italy, less affected by the Blight, were often labeled from prestigious regions such as Bordeaux or Tuscany. However, as producers became more famous, so did the value of their labels. Merchants often would take bottles of cheaper wine from the same region and change the label and sell them at prices resembling the expensive acclaimed wines.[[27]](#footnote-27) In modern times reporter Pierre-Marie Doutrelant alleged that high profile Chamagne houses, when short on stock, bought unlabeled bottles from cooperatives or big private-label producers in the region and sold it as their own.[[28]](#footnote-28) The claim led to a 2007 investigation by the Federal Bureau of Investigation. [[29]](#footnote-29)

One of the most famous alleged label fraudsters was Hardy Rodenstock. In the 1980’s and 1990’s Rodenstock hosted high-profile wine tasting events of old and rare wines from his collection, including many from the 18th and 19th centuries. Dignitaries, celebrities, and internationally acclaimed wine writers and critics attended these events. He once produced 125 bottles of Chateau d’Yquem, the oldest of which was claimed to be from 1784 at a wine tasting event in Munich.[[30]](#footnote-30) The value of the wine tasted at these events was inestimable. Rodenstock wine first came into controversy in the late 1990’s after David Peppercorn and his wife, Serena Sutcliffe questioned the authenticity of Imperial bottle of Chateau Petrus of 1921, 1924, 1926, 1928, and 1934 vintages. While the authenticity of these bottles was never proven, the current manager of Chateau Petrus confirmed that the estate has no records of producing Imperials during those vintages.[[31]](#footnote-31) In 2005, US art and wine collector Bill Koch, who had bought some of the bottles attributed to the private collection of Thomas Jefferson, attempted to exhibit some of the bottles at the Boston Museum of Fine Arts. Koch had purchased four bottles of Chateaux Lafite and Branne-Mouton at an auction house from the Chicago Wine Company and a British rare wine dealer Farr Vinters, paying a total of about 500,000 US dollars.[[32]](#footnote-32) The curator of the museum alleged that Jefferson’s records indicated that he was never in possession of the bottles. Inquires at the wine dealers alleged that the four bottles originated with Rodenstock. After an investigation by an ex-FBI agent Koch filed a lawsuit against Rodenstock in federal court claiming fraud in 2006. The case was thrown out for lack of personal jurisdiction over Rodenstock. Koch refiled the lawsuit in 2007. Rodenstock maintained that he was a German citizen, and therefore the court had no jurisdiction over him. This was compounded by the fact that the bottles were sold by third parties. A magistrate judge recommended that a default judgement be entered against Rodenstock in 2008. Rodenstock refused to take part in the lawsuit. Koch amended his lawsuit Koch later determined that nine more bottles had originated Rodenstock and amended his complaint in 2008. Finally a default judgement was entered against Rodenstock in 2010. Rodenstock maintained his innocence throughout trial to the media, however, he never provided proof that the bottles were originals.[[33]](#footnote-33)

Rudy Kurniawan was the first and only person to be convicted of wine fraud in the United States. Kurniawan attended California State University, Northridge in the late nineties on a student visa. After his visa had expired Kurniawan remained in the US. A warrant was eventually issued for his arrest and deportation. In the early 2000’s Kurniawan buying as much as $1 million at auctions of rare wines. His wine of preference was Burgundy, which exploded in popularity following the dotcom boom. He began hosting tasting events of rare wines with other collectors. He partnered with an auction house Acker Merral & Condit, and its owner John Kapon. In two auctions Rudy sold some his collection for $35 million. The sales of this wine led Acker Merral & Condit to become the largest auction house in the world. His large auctions allowed him to secure an advance from Acker Merral & Condit for the sum of $8.84 million dollars, allowing him to purchase more wines to be sold at auction. During the auction Kurniawan sold eight magnums of 1947 Chateau Leafeur. According to an expert on the wine, only five magnums of 1947 Chateau Leafeur were ever produced. Kurniawan kept his background a mystery from his clients, often claim to be the heir to a trust fund and that his family was the largest importer of Heineken in all of Indonesia. Rudy continued to purchase and sell wines. In April of 2007, Kurniawan consigned several magnums of 1982 Chateau Le Pin at Chirstie’s in Los Angeles. The Bottles were featured on the auction catalog’s cover. Representatives from Le Pin contacted the auction house and indicated that the bottles were fakes. Christie’s withdrew the lot from the auction after further review of the bottles. In 2008, Kurniawan cosigned several bottles allegedly made by Domaine Ponsot from the Clos St. Denis Grand Cru appellation with vintages ranging from 1945 through 1971. Laurnet Ponsot, head of Domaine Ponsot, saw the wine in an auction catalog and immediately knew they were fakes. Domaine Ponsot did not begin producing Clos St. Denis until 1982. Ponsot travelled to the auction and made a public appearance to withdraw the wines he knew to be fakes. After the up roar, auction houses began recalling Kurniawan’s wines and refused to sell them. Bill Koch filed a lawsuit in 2009 alleging that Kurniawan had knowingly sold fake bottles to him and other collectors. Bill Koch claimed in the documentary *Sour Grapes* that he had in his sizeable collection, 400 proven fake bottles of wine worth $4 million dollars. The FBI arrested Kurniawan at his house in Bel Air in 2012. When searching his house the FBI found corks, stamps, labels, and other tools involved in counterfeiting wine. The search also turned up numerous California wines that Kurniawan had been blending in order to fill the counterfeit bottles. Investigators and experts alike described Kurniawan’s fraud as more art than science. He was able to fool some of the world foremost experts in the industry, scoring near perfect scores for his wines from critics on the international rating scale. Kurniawan had made a significant amount of money over the years sending $17 million to his two brothers in 2007 alone. At trial the prosecutor noted that he was able to sell a single faked jeroboam of Chateau Mouton-Rothschild 1845 for $48,256 in 2006 as well as a significant amount of other evidence. Rudy was sentenced to 10 years in prison and forced to pay his victims $28.4 million in restitution. Ponsot claimed in the documentary Sour Grapes that in order to create one believable fake it would take an estimated one hour. Rudy was alleged to have sold 30,000 bottles in one auction alone netting $24.7 million dollars. In Ponsot’s opinion it was physically impossible that Kuriawan was acting alone. Despite this, no one else was charged in connection with the crime. It was later discovered that Kuriawan’s uncles on his mother’s side were two of the perpetrators of two of the most famous bank heists in Asia. Eddy Tansel, a bank executive, was able to steal $565 million. This was the largest bank heist in Chinese history to date. He was later arrested and put in prison. He subsequently escaped and remains at large. His other uncle Hendra Rahardja also committed a similar crime. As an executive of the largest bank in Indonesia, he was able to walk out of the doors of with over $200 million in cash. Rahardja also remains at large. Between the two uncles it is estimated that they stole $780 million. Only one tenth of the money stole has been recovered. Kurniawan is set to be released from Taft Correctional institution in Taft, California on January 9th, 2021. It is estimated that 10,000 bottles of Kurniawan’s fake wine is still in private collections today.[[34]](#footnote-34)

Today many vintners take preventative action in order to decrease the possibility for fraud. Major wine produces are now engraving bottles with serial numbers on the class denoting the vintage and producer of the bottle. Some are taking over control of the distribution process. For older vintages however, the treat of fraud still persists. Ponsot believes that 80% of Burgundy older than 1980 is fake.[[35]](#footnote-35) New techniques such as stable isotope analysis and isoscapes are likely to become crucial in determining fraud in this market.

Another prevalent form of wine fraud is illegal wine blending. Wines with darker colors are often thought of as having higher quality than lighter wines. Therefore, producers of wine left with light colored vintages would often blend the wines with darker products to increase the salability of wines. Reporter Doutrelant reported that if the laws against blending wines had been enforced in 1973 and 1974, at least a thousand producers would have been put out of business.[[36]](#footnote-36) Wine blending today has become more common practice in wines such as Cabernet Sauvingnon and Merlot.

As of 2014 17,980,000 acres of vines are planted around the world[[37]](#footnote-37). In 2014 the world produced 28,230,400,000 liters of wine[[38]](#footnote-38). And in 2014 the world consumed 24,701,440,000 liters of wine[[39]](#footnote-39). Today the wine market remains one of the largest perishable commodity markets in the entire world. Wine is known as an innovative way to store value, and a market for investors continues to be steady. Considering these facts, it is likely that many more producers and sells of counterfeit wines continue to remain at large.

1. Pierre Spahni, *The Common Wine Policy and Price Stabilization* (1988) p. 2 [↑](#footnote-ref-1)
2. Tim Unwin, *Wine and the Vine: An Historical Geography of Viticulture and the Wine Trade* (1991) p. 196 [↑](#footnote-ref-2)
3. Michael Maher, *On Vino Veritas? Clarifying the Use of Geographic References on American Wine Labels* , 89 CAL. L. REV . 1881, 1884 (2001). [↑](#footnote-ref-3)
4. *Uncorking the Past* , THE ECONOMIST , Dec. 22, 2001, at 29, 30. [↑](#footnote-ref-4)
5. http://penelope.uchicago.edu/~grout/encyclopaedia\_romana/wine/wine.html [↑](#footnote-ref-5)
6. Jancis Robinson (ed) *"The Oxford Companion to Wine"* Third Edition (2006) p. 589-590 [↑](#footnote-ref-6)
7. H. Johnson, *Vintage: The Story of Wine* (1989) p. 53-63 [↑](#footnote-ref-7)
8. *Id.* at 5. [↑](#footnote-ref-8)
9. Jac Thomas, *Textbook of Roman Law,* (1976) p. 353-354 [↑](#footnote-ref-9)
10. Antonio Niederbacher, *Wine in the European Community* (1983) p. 10 [↑](#footnote-ref-10)
11. Jancis Robinson (ed) *"The Oxford Companion to Wine"* Third Edition (2006) p. 157 [↑](#footnote-ref-11)
12. Rod Phillips, *A Short History of Wine* (2000) p. 245 [↑](#footnote-ref-12)
13. Peter Barton Hutt & Richard A Merril, *Food and Durg Law Cases and Materials* (1991) p. 2 [↑](#footnote-ref-13)
14. Tim Unwin, *Wine and the Vine: An Historical Geography of Viticulture and the Wine Trade* (1991) p. 196 [↑](#footnote-ref-14)
15. Jancis Robinson (ed) *"The Oxford Companion to Wine"* Third Edition (2006) p. 5 [↑](#footnote-ref-15)
16. Clive Coates, *An Encyclopedia of the Wines and Domains of France* (2000) p. 14 [↑](#footnote-ref-16)
17. Michael Maher, *On Vino Veritas? Clarifying the Use of Geographic References on American Wine Labels* , 89 CAL. L. REV . 1881, 1884 (2001). [↑](#footnote-ref-17)
18. Jancis Robinson (ed) *"The Oxford Companion to Wine"* Third Edition (2006) p. 5 [↑](#footnote-ref-18)
19. Pierre Spahni, *The Common Wine Policy and Price Stabilization* (1988) p. 11-12 [↑](#footnote-ref-19)
20. *Id.* [↑](#footnote-ref-20)
21. D. & P. Kladstrup *Champagne* p. 129-151  [↑](#footnote-ref-21)
22. H. Johnson *Vintage: The Story of Wine* p. 338-341 [↑](#footnote-ref-22)
23. Pierre Spahni, *The Common Wine Policy and Price Stabilization* (1988) p. 14 [↑](#footnote-ref-23)
24. B. Crowe, The Society of Wine and Jurisprudence, [“An Introduction to Appellations”](http://wineandjurisprudence.org/an-introduction-to-appellations/) [↑](#footnote-ref-24)
25. K. MacNeil. *The Wine Bible*, pp. 632-636. Workman Publishing (2001). [↑](#footnote-ref-25)
26. M. Frank, “Counterfeit Bottles Multiply as Global Demand for Collectable Wine Surges” (February, 2007) p. 14 [↑](#footnote-ref-26)
27. Jancis Robinson (ed) *"The Oxford Companion to Wine"* (2006) p. 4 & 26-27 [↑](#footnote-ref-27)
28. Frank. J, *Decantations*. NY: St. Martin's Griffin, 2001. Pp. 23-25 [↑](#footnote-ref-28)
29. Wilke, John, *The Wall Street Journal* (March 6, 2007). "U.S. Investigates Counterfeiting of Rare Wines" [↑](#footnote-ref-29)
30. P. Keefe [*The Jefferson Bottles*](http://www.newyorker.com/reporting/2007/09/03/070903fa_fact_keefe?currentPage=1), The New Yorker pages 1-10, September 3, 2007 [↑](#footnote-ref-30)
31. Suckling *"*[*A Taste of Deception*](http://www.winespectator.com/Wine/Archives/Show_Article/0%2C1275%2C1722%2C00.html)*"* Wine Spectator, May 31st 1998 [↑](#footnote-ref-31)
32. P. Keefe [*The Jefferson Bottles*](http://www.newyorker.com/reporting/2007/09/03/070903fa_fact_keefe?currentPage=1), The New Yorker pages 1-10, September 3, 2007 [↑](#footnote-ref-32)
33. ["September 6, 2006: World's most expensive bottle claimed fake as renowned collector sued"](http://www.decanter.com/news/94293.html). Decanter.com. [↑](#footnote-ref-33)
34. Ruben Atlas, Jerry Rothwell *Sour Grapes* (2016) [↑](#footnote-ref-34)
35. https://www.theguardian.com/global/2016/sep/11/the-great-wine-fraud-a-vintage-swindle [↑](#footnote-ref-35)
36. J. Robinson (ed) *"The Oxford Companion to Wine"* Third Edition pg 4 & 26-27 Oxford University Press 2006 [↑](#footnote-ref-36)
37. http://www.wineinstitute.org/files/World\_Vineyard\_Acreage\_by\_Country\_2014\_cTradeDataAndAnalysis.pdf [↑](#footnote-ref-37)
38. http://www.wineinstitute.org/files/World\_Wine\_Production\_by\_Country\_2014\_cTradeDataAndAnalysis.pdf [↑](#footnote-ref-38)
39. http://www.wineinstitute.org/files/World\_Wine\_Consumption\_by\_Country\_Revised\_Nov\_2015.pdf [↑](#footnote-ref-39)