

# The Protégé System and *Beratlı* Merchants in the Ottoman Empire: The Price of Legal Institutions

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## Abstract

The Ottoman Empire offered its subjects a menu of legal systems for contracting and litigation. This is surprising for economists; contract theory assumes a single legal authority that enforces the terms of a contract. This paper uses primary sources to analyze a particular facet of legal pluralism; the sale of exemption licenses called *berats* that gave non-Muslim Ottoman subjects access to European law in the eighteenth century. Ottoman subjects were willing to pay large sums for this access. Archival evidence shows that tax exemptions provided by *berats* cannot explain *berat* prices, and acquiring access to European trade was not a concern. Documenting systematic variation in *berat* prices across countries and examining records of disputes and litigations, I conclude that agents obtained *berats* in order to have access to European legal institutions and engage in forum shopping. This advantage allowed *berat* holders to dominate the Ottoman commerce by the end of the eighteenth century.

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# 1 Introduction

The economic history literature has largely left the Ottoman Empire out of the “Great Divergence” debate. However, this large, multi-ethnic empire deserves attention in understanding Europe’s and other economies’ long-run development trajectories. In the seventeenth century, the Ottoman state was a major economic power; by the nineteenth century it had fallen behind even the more peripheral European countries. Regardless, despite severe economic and financial crises, the Ottoman Empire managed to survive into the modern age with most of its institutions intact.

Research on the Ottoman Empire focused on its economic institutions to explain both its stagnation and persistence.<sup>1</sup> Kuran, for example, argues that the egalitarian Islamic inheritance law and the corporate form’s unavailability kept partnerships small and ephemeral.<sup>2</sup> Although Islamic law might very well have been the culprit, it was not the only option. The Ottoman Empire offered its subjects a menu of legal systems for contracting and litigation.

This paper focuses on a particular facet of legal pluralism: *berat* sales by European embassies.<sup>3</sup> *Berats* were exemption licenses that provided tax privileges as well as access to European law. *Berathlis*, i.e. non-Muslim Ottomans who carried *berats*, rose to prominence in Ottoman commerce at Muslims’ and Europeans’ expense. *Berathlis*’ ascendance in the Levant trade is an open question in the Ottoman economic history.<sup>4</sup>

On the one hand, *berat* sales constituted an important episode in the Ottoman Empire’s modernization, culminating in the adoption of the French commercial code in 1849. *Berats* fulfilled

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<sup>1</sup>See Kuran (2004b) and Pamuk (2004).

<sup>2</sup>See Kuran (2010) for details.

<sup>3</sup>*Berat* is the name of the patent. The word *berath* refers to the person who holds a *berat*. Europeans also referred to the *berathlis* as “honorary *dragomans*.” Throughout this paper, having access to European law/jurisdiction means agents have the option to use European law for contracting and dispute resolution.

<sup>4</sup>Kuran (2004a) pp. 475–476; Masters (1992) pp. 580–1; Eldem (1999) p. 258. In 1768, three-fourths of the cargo loaded at Smyrna on Dutch ships bound for Amsterdam belonged to minorities, Panzac (1992) p. 194. There is also anecdotal evidence from archival sources that draw attention to this development. See the British Library (hereafter BL), IOR/G/17/5: ff. 383–7, Paper by George Baldwin about the Turkish Trade, 22 January 1785; *Centre des archives diplomatiques de Nantes* (hereafter CADN) 166PO/D84/15; the National Archives (UK) (hereafter TNA) SP 105/338: pp. 73–76, 15 July 1819. All these sources confirm that the foreign trade was dominated by *berathlis*.

the growing demand for commerce-friendly legal rules and procedure, and fostered a strong middle class. On the other hand, it was a fraudulent system, where access to perhaps more “efficient” law was restricted and auctioned off. It led to a perverse game of rent extraction where *beraths* foiled contract enforcement by switching between European courts, who were happy to oblige to increase their revenues from *berat* auctions.

This paper makes three primary contributions. First, it resolves the motivations underlying *berat* acquisitions. I provide evidence that *beraths* valued European law and utilized their options over different legal jurisdictions in disputes. Second, I evaluate the relative attractiveness of various European legal-economic institutions by tracing the demand for each European power’s protection. The commercialization of access to law provides an unusual setting through which we can compare each European legal system’s relative expediency. Finally, the results provide insight about legal pluralism’s impact on contracts, trade and investment.

Economic historians have offered various theories regarding *berats*’ role in growth and why non-Muslims obtained them. Bağış emphasizes tax exemptions. Kuran argues that minorities purchased *berats* to use a more “efficient” (that is, European) legal system, which allowed them to dominate the Ottoman commercial life. One example of this greater efficiency, Kuran claims, is the more productive enterprise forms like the joint-stock company and corporation, which were unavailable in Ottoman law. Çizakça and Kenanoğlu dispute this hypothesis; they argue that the number of people who switched to European law is quite modest. Boogert also challenges the jurisdictional shift theory, arguing that consular courts did not apply their nations’ laws. He cites examples where consuls followed Islamic legal jurisprudence instead. Furthermore, he notes that consular courts did not have more sophisticated procedures (such as reliance on written evidence) compared to the Ottoman courts, and were not better equipped in dealing with more complex organizational forms

like joint-stock companies.<sup>5</sup> My work shows that while there is suggestive evidence for jurisdictional shift, *beraths*' success is better understood through their advantage to forum shop different European legal systems.

This paper also contributes to a rich literature that emphasizes the role of legal institutions in economic performance. La Porta et al. (1998) argue that the primary source of variation in many central economic institutions is the legal system's origin. Focusing on shareholder rights, the authors claim that common law is more conducive to growth. Guinnane et al. (2007) challenge this view, showing that common law countries restricted access to attractive organizational forms like the private limited liability company. Acemoglu et al. (2011) show that areas occupied by the French during the Napoleonic Era underwent radical institutional reform, including the adoption of the civil code, and experienced more rapid urbanization and economic growth, especially after 1850. In contrast, this paper evaluates a specific institution that allows us to rank different European jurisdictions' attractiveness in an earlier period. It also highlights how institutional details can matter. In this case, the multiplicity of legal systems itself has implications on trade regardless of legal origins.

## 2 Sources

This paper uses primary data from the National Archives (UK), the British Library, *Archives nationales*, *Centre des archives diplomatiques de Nantes*, and *Başbakanlık Osmanlı Arşivi*. There are no published registries or official accounts of *berat* transactions. Thus, I had to rely on indirect sources to construct the price data. My sources comprise diplomatic correspondence, especially letters between ambassadors and consuls, chancery registers, factor and merchant letterbooks, and

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<sup>5</sup>See Bağış (1983), Kuran (2004a), Çizakça and Kenanoğlu (2008) and Boogert (2009) for details; Kuran (2003), Kuran (2005) and Kuran (2010) for a discussion on the significance of the lack of corporate form in Islamic law and how it contributed to Middle East's divergence.

the Levant Company correspondence. Other sources include commands, registers and surveys by Ottoman officials. These data include bills of exchange, receipts and references to *berat* sales, *berat* registrations, as well as disputes, litigations and arbitrations.

The literature so far reported *berat* prices from secondary sources which are anecdotal, unreliable and communicate little sense of variation across time and countries. My data is the first large-scale sample of *berat* prices drawn from primary sources. Consular correspondence was invaluable for this construction. Ambassadors relied on their consuls for *berat* applications. For instance, a buyer in Izmir had to apply to the French consul for a *berat*. The consul then disclosed the applicant's name and bid to the ambassador, who received such applications from all his consuls (and also directly from applicants in Istanbul) and granted the *berat* to the highest bidder. Thus, the sale functioned like an auction.

Consular letters contain many such exchanges. To construct this data, I identified sales in the extensive correspondence between Istanbul and provinces (Aleppo, Izmir and Salonica). Given the haggling on the price, I only included prices that I could verify with a receipt, confirmation of funds, or a bill of exchange. Thus, my sample represents actual transactions.

## 3 Background

### 3.1 *Berat* Sales

Choice of law had always characterized the Ottoman Empire's legal setting, which arranged the empire's subjects based on religion. In civil and commercial matters, non-Muslim minorities could contract under either their religious law or Islamic law. Muslim subjects, however, had to use Islamic jurisprudence until the advent of secular courts in 1849. Furthermore, in the eighteenth century, Ottoman minorities could access European law through *berats*.

Similarly, the Ottoman government recognized each European country's residents as a separate community, with the ambassador as the leader and supreme judge.<sup>6</sup> Foreign merchants in the Ottoman Empire long enjoyed certain privileges thanks to Capitulations, concessionary agreements the Sublime Porte—or the Porte, as Europeans referred to the Ottoman government—had made with European powers. The Porte allowed Europeans to use consular jurisdiction in any dispute not involving Muslims. They were exempt from various taxes levied on non-Muslims and enjoyed lower tariffs.<sup>7</sup>

Capitulations granted European ambassadors another important privilege: the right to employ any non-Muslim Ottoman as *dragoman*, or interpreter.<sup>8</sup> The Porte fixed the number of *dragomans* that embassies could recruit, depending on each ambassador's influence at the Sultan's court.<sup>9</sup>

In time, embassies began to cultivate their own interpreters and had no need for Ottoman subjects. Thus, ambassadors began to auction off these surplus *berats* at high prices to minorities. We do not know when this commercialization started. British ambassador John Murray remarked that selling vacant *berats* was a “perquisite that had belonged to [the] Embassy from its first institution,” i.e. 1583.<sup>10</sup> As early as 1706, the Levant Company made efforts to stop disbursing *berats* to merchants. The Company's order was a response to Armenian partners and brothers Antoon di Giorgio in London, Serchis di Giorgio in Izmir and their brother-in-law Zachariah in Leghorn, who were undercutting British merchants' profits. Antoon and Serchis had British *berats* but were not *dragomans*.<sup>11</sup> The French chancery in Salonica displays a *berat* registration for a Greek hon-

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<sup>6</sup>Ambassadors and consuls were agents of the national organization that regulated the Levant trade. For the British, this was the Levant Company and for the French, the *Chambre de commerce de Marseille*. Both of these bodies also had a monopoly over trade. In contrast, the Dutch Republic followed the principle of free trade despite having a similar government body, Boogert (2003) p. 618–9.

<sup>7</sup>Boogert (2005) p. 66, 78; TNA FO 78/16: f. 87 Sir Robert Liston [ambassador] to Lord Grenville [secretary of state], 25 April 1795.

<sup>8</sup>The word *dragoman* or *drogman* is the Latinized form of the Arabic *tarjuman*, literally interpreter (Boogert (2005) p. 8)

<sup>9</sup>TNA FO 78/16: f. 87; FO 78/50: f. 15 Report on Barats, 24 April 1806.

<sup>10</sup>TNA SP 110/87: John Murray [ambassador] to the Levant Company, 15 May 1767.; Wood (1925) p. 533

<sup>11</sup>TNA SP 105/115: Levant Co. to Consul Sherard, 18 July 1706

orary *dragoman*, Anastasio Maruchy, in 1718.<sup>12</sup> British chancery registers show disputes involving honorary *dragomans* in 1732. Thus, *berat* sales must have been well underway by 1720s.<sup>13</sup>

The appointment of *berathls* as interpreters was a farce. Honorary *dragomans* did not reside at their place of “assignment,” and usually did not know the language of the nation whose *berat* they possessed. Ambassadors even concocted fictitious consuls to increase the number of *berats*.<sup>14</sup>

By the end of the eighteenth century, the Porte made several futile attempts to suppress *berat* sales and prevent *berathls* from engaging in trade, manufacturing, tax farming or guilds.<sup>15</sup> In 1806, the government ordered each *berathl* to give up his patent or return to the place of residence specified in his *berat*. About thirty Russian, French and Austrian protégés complied fearing reprisal and paid all taxes that had accumulated from the date they acquired their *berats*.<sup>16</sup> Others petitioned for naturalization by the government that protected them.<sup>17</sup> At the same time, the Porte formed its competing protection system called “Europe merchants” (*Avrupa tüccarı*), and issued first such patents in 1806.<sup>18</sup> Britain agreed to stop *berat* sales permanently with the Treaty of the Dardanelles in 1809. Other countries followed suit with similar clauses, marking the end of this particular form of foreign protection.<sup>19</sup>

### 3.2 Why Buy *Berats*?

*Berats* provided important privileges. They conferred exemptions from the capitation tax (*haraç*), extra-ordinary taxes (*avarız*), the butchery tax (*kassabiye*) and non-canonical taxes (*tekalif-i ör-*

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<sup>12</sup>AN AE/B1/997: *La Protection de France accordée aux Juifs, et autres Etrangeres*.

<sup>13</sup>TNA SP 110/182: f. 162.

<sup>14</sup>TNA FO 78/16: f. 88, 89 Sir Robert Liston [ambassador] to Lord Grenville [secretary of state], 25 April 1795, FO 78/50 f. 15 Report on Barats, 24 April 1806, Rey (1899) p. 256.

<sup>15</sup>Boogert (2005) pp. 107–108; TNA FO 78/6: f. 312-313 Traduzione d’un Comandamento diretto a S. Eccellenza il Reis Efendi, 29 October 1786, TNA FO 78/16: f. 90 Sir Robert Liston [ambassador] to Lord Grenville [secretary of state], 25 April 1795.

<sup>16</sup>TNA FO 78/16: f. 9-10 Charles Arbuthnot [ambassador] to Charles James Fox [secretary of state], 5 May 1806.

<sup>17</sup>Rey (1899) pp. 276–7.

<sup>18</sup>TNA, FO 78/50: f. 19-20 Report on Barats, 24 April 1806, Bağış (1983), Boogert (2005) pp. 110–111, The Imperial protections will be discussed in more detail in the following sections.

<sup>19</sup>Rey (1899) pp. 279–80.

*fiyye*). They also reduced the tariff burden from 5 per cent to 3 per cent, at least in theory. *Berats* placed *berathls* out of local courts' reach, and gave them access to consular jurisdiction for dispute resolution and arbitration services. *Berathls* could also use the legal-economic institutions, such as enterprise forms, of the country that bestowed the *berat*. Thus, a *berathl* was practically a European subject armed with extraterritorial rights. *Berats* secured these privileges for life and protected *berathls*' sons as well as two "servants." Like *berathls*, these two agents each had patents called *nefer fermans*.<sup>20</sup> Later, ambassadors started selling *nefer fermans* separately from *berats*. *Berats* returned to the embassy with its attached *fermans* upon a *berathl*'s demise.

*Berat* was not property; it was a deed of appointment. A *berathl* could not sell, transfer or bequeath his patent. Hence, there was no secondary *berat* market. Strictly speaking, it could not be sequestered and counted as collateral either, but embassies regularly seized and auctioned *berats* off to settle *berathls*' debts.<sup>21</sup> Furthermore, *nefer fermans* also returned to the embassy when their holders relinquished them or passed away. It was impossible for *berathls* to re-sell these servant *fermans*, thus ruling out a speculation motive to acquire *berats*.<sup>22</sup>

### 3.3 Why Did Ambassadors Sell *Berats*?

The Ottoman government fixed the number of *berats* for each embassy, depending on the ambassador's influence and the power of the country he represented. Great Britain and France had the

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<sup>20</sup>The Western sources refer to these servant or agents as *neferli* or *fermanli*.

<sup>21</sup>For instance, in 1758, an Austrian protégé Nasrallah Arkash's *berat* was auctioned off to settle his debt to the Levant Company physician Patrick Russell, TNA, SP 110/62: f. 4, 11 September 1758. In 1776, Ainslie sequestered George Lazzaro's *berat* to pay his debt to Murray's heirs, FO 261/3: Ainslie to Olifer [consul at Salonica], 30 December 1776, *ibid.* Ainslie to Olifer, 8 March 1777, *ibid.* Ainslie to Olifer, 29 May 1777. In 1782, Ainslie requested the Austrian internuncio to sequester Austrian protégé Stano's *berat*, worth 250–300 sterling pounds, to settle Stano's debt, FO 78/3: ff. 54–58, Ainslie to the Earl of Hillsborough [secretary of state], 26 March 1782; FO 261/4: pp. 199–201, Ainslie to Sir Robert Murray Keith, 26 March 1782. In 1793, Ainslie ordered Strane to divest Anagnosti Theorapulo of his *berat* if he didn't pay the 2,500 *kuruş* debt on his bond, FO 261/7: p. 315–316, Ainslie to Strane [consul at Patras], 6 May 1793.

<sup>22</sup>A request by an Aleppine *berathl* for two *fermans* after the two attached to his *berat* were vacated by their holders' decease was strongly rejected by the ambassador, who claimed that such a practice was unprecedented and would in fact give the *berathl* four *fermans* instead two, making the *berat* "an excellent speculation as well as protection." TNA, FO 261/6: p. 323 Ainslie to DeVezein [consul at Aleppo], 12 May 1789.

largest number at about 40–50. Other countries' *berats* ranged between 20–40. Ambassadors distributed *berats* as they wished, and the returns were their personal emolument.<sup>23</sup> Ambassadors' income mostly derived from *berat* sales. A British ambassador's annual salary was 8,000 *kuruş* whereas he made 12,000 *kuruş* each year on average from selling *berats*.<sup>24</sup> Thus, ambassadors were eager to transact *berats* despite finding it "scandalous."<sup>25</sup>

European merchants were far less enthusiastic about sharing their privileges with Ottoman subjects. Indeed, the Levant Company made several attempts to curb *berat* sales but in the end yielded to the ambassadors.<sup>26</sup>

European merchants opposed *berats* on two grounds. First, the expanding number of protégés drew Ottoman officials' attention, who then infringed on both Europeans' and protégés' privileges.<sup>27</sup> For instance, when the Porte attempted to raise tariffs in 1792, a British merchant blamed *beraths*, claiming that *berats* enriched ambassadors at British trade's expense.<sup>28</sup> Furthermore, *beraths* posed significant competition to European merchants. Beaujour advised *berats*' suppression precisely for this reason.<sup>29</sup> Indeed, by the nineteenth century, *beraths* had taken over most of the export trade.<sup>30</sup>

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<sup>23</sup>TNA, SP 97/52: ff. 103–113, Ainslie to Lord Viscount Weymouth, 4 November 1776

<sup>24</sup>TNA, FO 78/16: f. 86, 89 Liston to Lord Grenville, 25 April 1795

<sup>25</sup>TNA, SP 110/87: Murray to Hayes, 14 August 1767

<sup>26</sup>In 1746, attributing the British trading post's disputes with the Aleppine magistrates to the honorary *dragomans*' conduct, the Company advised to stop further *berat* sales. In 1748, the Levant Company tried to limit the number of *berats* which the ambassador James Porter rejected. In 1760, in response Ottoman officials' complaints, the Company ordered each consul to submit a list of *beraths* and *fermanlıs* and inform the Company about every subsequent *berat* registration. Regardless, the Levant Company could not bring the issue under its control and in the end yielded to the ambassadors. Boogert describes this sequence of events in detail, see Boogert (2005) pp. 97–101. For primary sources, see TNA SP 105/118: p. 32, The Levant Company to Pollard [consul at Aleppo], 14 November 1746, *ibid.* p. 98, The Levant Company to Porter, 19 January 1748, SP 105/119: pp. 64–65, The Levant Company to Porter, 12 September 1760, *ibid.* p. 66, The Levant Company to Consul Crawley, Smirna & to Consul Kinloch, Aleppo, 12 September 1760, *ibid.* p. 67, [same letters to Consul Turner, Cyprus, and Consul Abbott, Tripoli], 12 September 1760, *ibid.* p. 126: The Levant Company to Kinloch, 25 March 1763, *ibid.* pp. 177–178, The Levant Company to Kinloch, 10 December 1765, *ibid.* pp. 197–198, The Levant Company to Kinloch, 1 July 1766

<sup>27</sup>On an account of the decrease of the British trade in Aleppo, the British factory blames transgressions on their privileges by the Porte, the chief cause of which they claim is the "great number of Honorary Druggomen [...] many of whom are known to be Merchants or Manufacturers, who create many Embroils, & cause more Trouble to the Consul [...] then the whole of the Affairs of our own Nation." TNA, SP 110/29: f. 107, The British Factory at Aleppo to the Earl of Halifax, 30 July 1765.

<sup>28</sup>TNA, SP 105/189: pp. 473–475, Humphrys, 17 November 1792.

<sup>29</sup>"Mais la principale raison qui doit faire proscrire les barats, c'est que les barataires jouissant des mêmes exemptions que les Français, sont pour nos négocians de véritables concurrens; et des concurrens d'autant plus dangereux, qu'il font le commerce avec moins de frais que nous." Beaujour (1800) p. 288.

<sup>30</sup>Masters (1992) pp. 580–581.

### 3.4 Prices

*Berat* sales were essentially auctions, despite some haggling in a given transaction. Ambassadors regularly transferred *berats* between cities, ensuring a single *berat* market across the empire. There was so much demand for *berats* that generally one would not be available at the time of application. Instead, buyers would wait for the first vacant one, sometimes even depositing the money in advance as credit.<sup>31</sup>

Table 1 reports *berat* prices I constructed using primary evidence, whose details are in Section 2. This method also reveals that Dutch *berats* cost 2,500 *kuruş* in 1759 and Neapolitan *berats* 4,000 *kuruş* in 1784.<sup>32</sup> Some anecdotes are informative, as well. Robert Liston noted that British *berats* fetched up to 6,000 *kuruş* and Russian *berats* 10,000 *kuruş*.<sup>33</sup> Beaujour wrote in 1799 that both British and French *berats* were worth about 10,000 *kuruş*.<sup>34</sup> Boogert, using primary evidence, shows that Dutch *berats* fetched 2,500–3,000 in the 18th century, and 4,500 *kuruş* by 1803.<sup>35</sup>

A buyer had to make several more payments, not reported in Table 1. French *beraths* paid the consul 150–300 *kuruş*, which rose to 600 by 1781. They remitted 300 *kuruş* to each new ambassador and 100 to each new consul assigned to their province.<sup>36</sup> Other countries' *beraths* had to make similar payments.<sup>37</sup> Furthermore, upon a new Sultan's accession, *beraths* had to make a renewal fee of 300–500 *kuruş*.<sup>38</sup> Thus, someone applying for a French *berat* in 1750 had to disburse at least 3,150–3,300 *kuruş*, and could expect to make more payments to the ambassador, the consul, and the Sultan. *Beraths* were also willing to make other voluntary contributions to preserve their status. In 1739, when the Dutch decided to abandon their post in Aleppo, their *beraths* compensated the

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<sup>31</sup>TNA, FO 261/3: Ainslie to Abbott, 12 May 1777, *Ibid.* Ainslie to Vernon, 9 August 1777.

<sup>32</sup>CADN 166PO/D84/4 and TNA SP 110/46, respectively.

<sup>33</sup>TNA, FO 78/16: f. 88, Liston to Grenville, 25 April 1795

<sup>34</sup>Beaujour (1800) p. 285

<sup>35</sup>Boogert (2005) pp. 80–81

<sup>36</sup>CADN 166PO/D1/21: Amé to St. Priest, 8 November 1781

<sup>37</sup>CADN 166PO/D84/3: 8 November 1758, 166PO/D1/12: 1770, 166PO/D1/20: 30 December 1779

<sup>38</sup>CADN 166PO/D1/16: 20 June 1774; TNA, FO 78/16: f. 88, Liston to Grenville, 25 April 1795

consulate's expenses.<sup>39</sup>

One can see from Table 1 that *berat* prices in real terms were generally stable over time. There seems to be a degree of stickiness as prices were slow to respond to devaluations. Another striking feature is the cross-sectional variation: French *berats* were the most expensive followed closely by Britain. Dutch and especially Austrian *berats* were substantially cheaper.

The revenue *berats* generated was ambassadors' personal income. For instance, in 1760s, a French *berat* cost 3,000 *kuruş*. The ambassador paid about 500 *kuruş* to the Ottoman government for registration fees and retained the rest for himself.

*Berats* were remarkably expensive. In 1794, a British *berat* cost roughly 55 times the Ottoman GDP/capita at the time. Using average earnings, we see that a British *berat*, which fetched 425 pounds sterling in 1780, was worth 893,000 US dollars in 2010.<sup>40</sup>

Furthermore, consider *per annum* wages of unskilled and skilled labor in Istanbul in the eighteenth century. Between 1780–1789, an unskilled worker's yearly income was about 142 *kuruş*; a skilled worker's 284 *kuruş*.<sup>41</sup> Concurrently, a French *berat* cost 5,000 *kuruş* and a British *berat* 4,000. Boogert puts these figures into perspective, assuming a price of 2,000 *kuruş* in 1763. In the early eighteenth century Aleppo, a single *berat* sale could sustain the Dutch consulate's expenses for the entire year, or cover six months worth of expenses in late eighteenth century.<sup>42</sup>

### 3.5 Number of *Beraths*

*Beraths* constituted a small class of non-Muslims in the Ottoman economy. The Porte fixed *berat* numbers for each country. Tables 2–4 give estimates of British, French and Dutch *berats* for select

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<sup>39</sup>Boogert (2003) p. 626

<sup>40</sup>Measuring Worth, <http://www.measuringworth.com>; Pamuk (2006) p. 815. I used the GDP/capita estimate for the year 1820. Similarly, assuming a constant growth rate and estimating the Ottoman GDP/capita in 1794, I find that the price of a British *berat* was 63 times the Ottoman GDP/capita.

<sup>41</sup>See Özmucur and Şevket Pamuk (2002) p. 301 for data on daily wages. I assumed 300 work days per year.

<sup>42</sup>Boogert (2005) p. 81

years. Table 5 shows a survey by the Ottoman government in 1793–4, which found 253 *berats* in circulation. Note that this survey underestimates Austrian *beraths* and does not list Russian *berats* at all as the Porte had annulled their *berats* due to an ongoing war. Furthermore, it does not report Spain’s *berats*. Correcting for those, we can estimate about 340 *berats* in circulation. Each *berat* protects its holder, two *nefer* agents and adult sons, say two.<sup>43</sup> Thus, under this system, there were about 1,700 people under protection in the entire empire. Evidently, this number is rather modest and contrasts with the previous citations of protégés on the order of hundreds of thousands.<sup>44</sup>

## 4 Explanations

### 4.1 Tax Exemptions

In this section, I show that tax exemptions cannot explain the *berat* price. The cross-sectional price variation itself is very strong evidence against this hypothesis. Since all *berats* granted the same tax privileges, *berat* prices across countries would have been very close without some value beyond tax evasion.

*Berats* granted exemptions from *haraç*, *avariz*, *tekalif-i örfiyye* and *kassabiye*. The *haraç* tax was imposed on all adult males and its rate depended on the subject’s income. Being expensive objects, only the rich could afford *berats*. Hence, I assume the highest rate for this period, 11 *kuruş per annum* per male. The other taxes were imposed on *hane*, which was an Ottoman tax unit larger than a household. Their annual rates stabilized around 8 *kuruş per hane*. I assume that these are

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<sup>43</sup>There is no available data on the demographics of the Empire in the eighteenth century. However, archival sources suggest that *beraths* had about 1–2 sons on average. See below.

<sup>44</sup>At some point, Russians allegedly protected 120,000 natural-born Ottoman subjects, and Austria 200,000. See TNA FO 78/16: ff. 9–10, Arbuthnot to Fox, 5 May 1806; Bağış (1983) p. 35, Kuran (2004a) pp. 501–2. These numbers are unsubstantiated. Furthermore, the literature on protégés seems to have confused *beraths* with other forms of protection. These very high numbers refer to consular patents of protection and passports that Russia and Austria distributed for free and indiscriminately. Some non-Muslim subjects claimed to be naturalized Russian citizens after a short visit to Russia. For details, see Rey (1899) pp. 280–281; Bağış (1983) p. 35; TNA FO 78/50: f. 25, Secret Remarks upon the Present Conduct of the Porte.

imposed on the household. Demographic and household data in the eighteenth century are scarce. However, my archival data suggest that *beratls* had about two children on average.<sup>45</sup> Again, I conservatively assume that a *beratli* has two sons at the time of purchase. Since *berats*' privileges extended to two agents as well, I estimate the annual value of tax exemptions as 63 *kuruş*.

In order to calculate the present discounted value of tax exemptions, I use the probability of death to derive the discount factor, assuming away interest rates and inflation. The probability of death is a natural base since a *berat* terminated with the *beratli's* decease and could not be bequeathed to his heirs. Having no interest rates and inflation is harmless as their inclusion would make future taxes worth less. Since the nominal tax rate was stable throughout the eighteenth century, discarding changes in the tax rate is innocuous. Thus, I estimate a conservative upper bound for the present discounted value of tax exemptions at 660 *kuruş* for a 25 year-old buyer with two adult sons. It is evident that even such a relaxed upper bound is substantially lower than a *berat's* market price at 3,000 *kuruş*.<sup>46</sup> Note that the Porte charged 500–1,000 *kuruş* on each *berat*, effectively extracting the expected tax revenues it lost.<sup>47</sup>

The secondary literature argues that tariff cuts could also have driven *berat* acquisitions.<sup>48</sup> Non-Muslim subjects paid 5% *ad valorem* tariffs, Muslims 4%, and Europeans 3%, thanks to Capitulations. The primary evidence is confounded on the subject. The *berat* document itself does not list lower customs as a privilege (as opposed to all other taxes listed above). Possibly, *beratls* did not get lower customs by default except the Swedish and the Dutch.<sup>49</sup> The British and

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<sup>45</sup>Number of children under protection (presumably male) per *beratli* in Aleppo *c.* 1768 is 1.2 (CADN 166PO/D1/10), number of children (male and female) per *beratli* in Smyrna *c.* 1782 was 2.2 (AN AE/BI/1066: *Barataires de France*, 31 December 1782).

<sup>46</sup>I calculated the probability of death using the figures from the “West” Model Life Table, Level 5, males, Coale et al. (1983) p. 44. This is the model life table for a stable population with the life expectancy level closest to the estimates in the Ottoman Empire. See de Laet et al. (1999) p. 232 and Quataert (2005) p. 112.

<sup>47</sup>TNA SP 110/87: Murray to the Earl of Shelburne, 17 August 1767. These charges were quoted in the *berat* price.

<sup>48</sup>Bağış (1983) p. 28

<sup>49</sup>“[...] That since some years these Commands are uniformly refused except to the Sweeds [*sic*], because they having no Merchants in Turkey their Baratlees are supposed to act in their stead & to the Dutch because the trade with Holland being open to all the raya's are by this means put upon a par with the subjects of Holland [...]” (TNA, FO 261/4: p. 259, Ainslie to Hayes, 3 May 1782.) Sweden and the Dutch Republic likely obtained this privilege in

French ambassadors did manage to get 3% customs by making separate applications to the Ottoman government on an individual basis. However, these privileges had to be renewed almost annually following a new customs officer's appointment. There could also be other restrictions. For instance, the reduced customs that the British obtained for their *beratls* only applied to *beratls*' trade with Britain.<sup>50</sup> *Beratls* also had to make substantial payments and bribes each time they obtained these commands, costing as much as 1,056 *kuruş*.<sup>51</sup> Thus, *beratls* paid more than 3% customs even if they did get the Ottoman government's confirmation. Clearly, the French and the British could not secure lower customs effectively. The fact that theirs cost more than the Dutch *berats* suggests people valued *berats* beyond tariff cuts.

Tariff payments also depended on the city and the particular customs officer who operated there. For British and French *beratls* alike, lower tariff requests came exclusively from Izmir. In contrast, Aleppo records first mention customs privilege in 1803.<sup>52</sup> Furthermore, customs officers in some cities (e.g. Salonica) lowered the tariff on their own in order to divert trade.<sup>53</sup>

Regardless, we can replicate the exercise above in order to infer an upper bound on the present discounted value of lower *ad valorem* tariff. Assuming the agent's trade incentives do not change when he pays lower tariffs—that is, he has the same trade volume under both tax regimes—a 25-year-old agent with two adult sons needed to import and export at least 11,156 *kuruş* worth of goods in 1750 in order to justify paying 3,000 *kuruş* for a *berat*; or 20,694 *kuruş* in 1780 for a *berat*

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1777 (CADN 166PO/D84/14: Peyssonnel to St. Priest, 8 June 1777).

<sup>50</sup>The following letters list a few *separate* examples of many repeated requests for lower customs. Sometimes a *berathl* made several requests in a year if a new custom officer's appointment invalidated the previous command. CADN 166PO/D84/3: 10 September 1758, Panaiolti [French *berathl*] to Thomas [Consul of France in Smyrna] no date, 17 September 1758; 166PO/D84/4: 2 August 1759, 23 October 1759, 15 September 1760; 166PO/D84/7: 7 January 1765, 20 November 1767; 166PO/D84/8: 16 February 1768, 10 September 1768. *Beratls* in Izmir noted that the change in customs officers leads to a pretension of double customs, making the old privileges invalid. *Ibid.* Smyrniot *beratls* to St. Priest, 16 September 1769. For British *beratls*' lower customs requests, see TNA, SP 110/87: Murray to Hayes, 25 September 1766; FO 261/4: Ainslie to Hayes, 3 May 1782; FO 261/6: Ainslie to Hayes, 15 April 1790.

<sup>51</sup>This sum was partitioned between the four *beratls* of France in Smyrna. (166PO/D84/8 Thomas to St. Priest, 16 September 1769, and Smyrniot *beratls* to St. Priest, 16 September 1769).

<sup>52</sup>The Consul of France in Aleppo noted if the *beratls* of Russia pay lower customs, then *beratls* of France must have this privilege as well, CADN 166PO/D1/29: 29 *fructidor* XI.

<sup>53</sup>CADN 166PO/D84/3: 18 October 1758

costing 5,000 *kurus*.<sup>54</sup>

Unfortunately, I am not aware of any data on how much trade *beraths* did. The closest approximation I was able to obtain was the Izmir customs registers.<sup>55</sup> In 1771–2, merchants using European ships paid 89 *kurus* customs on average, implying a trade volume of about 3,000 *kurus* per year. Between 1794–1804, the average import volume to Izmir per year was 1,750 *kurus* per merchant, with those using Ottoman ships importing about 2,171–3,000 *kurus* worth of goods on average. Trade volume per *berath* is unlikely to be orders of magnitude greater than these figures. In 1759, a French *berath* in Izmir paid 100–120 *kurus* customs at the 5 per cent rate, suggesting his trade volume was about 2,000–2,400 *kurus*.<sup>56</sup> Similarly, Yanaki Cana, another French *berath* in Izmir, paid 500 *kurus* in 1767, also at 5 per cent, implying a trade volume of 10,000 *kurus*, which was worth 7,931 *kurus* in 1750.

Finally, multiple *berat* purchases within a partnership cast further doubt on tax motive in general, especially in partnerships involving fathers and sons. Tax privileges alone can neither explain why a *berath*'s son would himself acquire a *berat* nor account for an agent's incentives to buy multiple *berats* from different countries. I discuss some of these cases more concretely in Sections 4.3 and 4.4.

## 4.2 Access to Trade Networks

One can argue that *berats* granted protégés access to trade networks and markets that would otherwise be unavailable.<sup>57</sup> The only reason foreign merchants would not include Ottoman subjects in their trade is aversion to potentially subjecting their firms to the Ottoman law. This was a real

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<sup>54</sup>Alternatively, we can let incentives change under both tax regimes. Using a simple model of dynamic programming, I get a lower bound of 21,540 *kurus* on trade volume in order to explain the price of a *berat* costing 5,000 *kurus*.

<sup>55</sup>See Küçükcalay and Elibol (2006) and Kucukcalay (2008) for details.

<sup>56</sup>CADN 166PO/D84/4: 10 February 1760

<sup>57</sup>I am grateful to Francesca Trivellato for drawing attention to this possibility.

concern for the British.<sup>58</sup> Indeed, we might expect agents to have a preference to transact only with parties who have fewer jurisdictional options.

There are several pieces of evidence against this hypothesis. First, the argument itself implies that the British would not want to trade with British *berathls* either, since the latter still had access to Ottoman law in addition to the British law.<sup>59</sup> A comprehensive reading of factor letter books and chancery registers suggests that the British did not use *berathls* even as agents.<sup>60</sup> In addition, the British made a concerted effort to keep *berathls* out of the British trade. Preventive measures included charging 20 per cent consulage fees on all *berathls* using British ships. Clearly, buying the British (or any) *berat* did not grant access to the British trade. The French also imposed similar restrictions until the late eighteenth century.<sup>61</sup>

On the other hand, the Dutch imposed no such restriction. They adopted a free trade policy and *berathl* partners regularly opened establishments in Amsterdam, participating in that trade with or without Dutch merchants' involvement. Moreover, many of these *berathls* had French or British *berats*. Thus, the Dutch trade was not exclusive to Dutch *berathls*, either. In fact, by the late eighteenth century, *berathls* had replaced the Dutch commercial houses in Izmir almost completely.

Arguably, *berats* allowed non-Muslims to participate in the European Levant trade by becoming intermediaries for the country whose *berat* they carried. There are two pieces of evidence against this argument. First, *berathls* themselves were not simply intermediaries. Although the very first buyers in the early eighteenth century might have been such (although primary sources are silent on the matter), by 1760 a typical *berathl* was a merchant who had established commercial houses in the Levant and Europe, had partnerships with other *berathls* and were serious contenders to European

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<sup>58</sup>TNA, FO 352/1: p. 400, Memorandum, 5 January 1811. An extract of this document is displayed later.

<sup>59</sup>In fact, the British could always use Turkish courts as well, no matter how reluctant they are to do so.

<sup>60</sup>Except one case where a British merchant bought a British *berat* for his warehouseman, BL Add MS 46933: f. 217, Consul of Britain in Aleppo to James Porter, 3 October 1754.

<sup>61</sup>TNA SP 105/122: pp. 369–370, The Levant Company to Alexander Straton, 10 June 1803; BL IOR/G/17/5: ff. 383–7, Paper by George Baldwin about the Turkish Trade

merchants. Consuls' *dragomans* (as opposed to *berathls*) and brokers did the actual intermediation. Second, while these brokers would sometimes buy *berats* or *nefer fermans*, there is little correlation between their *berats*' types and the country whose trade they intermediated. For example, anecdotal evidence shows that French merchants had British, Swedish or Neapolitan *berathls* as brokers.<sup>62</sup>

Primary sources suggest that *berathls* mostly formed partnerships with other *berathls* or non-Muslim Ottomans who later purchased *berats*. Anecdotes from the archives indicate that especially *berathls* in Izmir participated in the European and Levant trade by sending partners to Amsterdam and Livorno.<sup>63</sup> More concretely, thanks to Kadi's recent work, we now have a good sense of the prominent Izmirian merchants who traded with the Dutch Republic.<sup>64</sup> Cross-checking his findings with my sample, I was able to identify these non-Muslim traders as *berathls*. Arakel d'Ovanez (Arachiel di Ovannes), an Armenian merchant and *berathl* of France, did business for Simon di Ovannes in Amsterdam. Zingrilara, a Greek trader who had obtained Dutch citizenship before acquiring a French *berat*, operated a commercial house in Izmir and did many ventures in Amsterdam. He had a partnership with Vidali, another Greek *berathl* of France. Manuel Kiriaco de Panajoti (di Panaiotis), a French *berathl* in Izmir *c.* 1758, operated a commercial house in Izmir, had formed a partnership with the Dutch trader Jacob de Vogel in 1760s and made consignments to another Dutch merchant De Bok as well as Stati Thoma, a Greek merchant in Amsterdam. Manuel Kiriaco's father Paniotis di Jossif had a Dutch *berat* and had partnerships with several Dutch traders. Nicolo Patrichi and Antonio Bachatori, had a partnership with Mireck d'Isay, all of whom had British *berats* and did business in Amsterdam. There are four Mavrogordatos mentioned in Kadi's work, possibly

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<sup>62</sup>The French merchant Taupin in Aleppo had a British *berathl* warehouseman, Saad, BL Add MS 45933: f. 123, Drummond to Porter, 5 April 1753 and CADN 166PO/D1/1: Drummond to Thomas. French merchants Pons and Vailhen had Yusuf Karali, a protégé of Sweden and later a *berathl* of Spain, as agent, broker and warehouseman, CADN 166PO/D1/21: St. Priest to Amé, 28 October 1782, 22: Vailhen to the ambassador, 8 June 1785. Samuel Yomtoll Moliano, *berathl* of Sweden was the broker of the Danish consul in Salonica *c.* 1763, CADN 166PO/D71/3: The minutes from the Chancery of the Consulate of France.

<sup>63</sup>As an example, see CADN 166PO/D84/8: 1 February 1769. Also see BL IOR/G/17/5: ff. 383—387, Paper by George Baldwin about the Turkish trade, 22 January 1785; and Boogert (2006).

<sup>64</sup>See Kadi (2012).

brothers. Yanni Mavrogordota was a *berathl* of Sweden. An unnamed *berathl* Mavrogordato had two *berathl* partners in Izmir and merchant houses in Izmir, Chios and Amsterdam. These partners did “a quarter of trade of Holland in the quality of commissioners and a lot of business in other places of Italy.” Gio Mavrogordato and Gio Anastasio were *berathl* partners whose firm, Gio Mavrogordato, Gio Anastasi & Co., did business with a partnership of two Swedish *berathls*, Petri Petrocokino and Catansino, and had signed consignments to the Dutch merchant De Bok for their merchandize in Amsterdam. Pietro Cokino and Paolo Rodocanaky (Petro Cochino and Rodocanachi), had French *nefer fermans* and did trade with Mireck d’Isay, a British *berathl* in Amsterdam as noted earlier. A firm of British *berathls*, Demetrio & Nicola Bachatori & Co., did business in Amsterdam and empowered a Greek merchant there to collect their debts from Dutch firms. Yenaki Kana, a French *berathl* in Izmir, did extensive trade with the Dutch through which he undercut French merchants’ profits in Izmir to their frustration.<sup>65</sup>

### 4.3 Jurisdictional Shift Hypothesis

Kuran first articulated the jurisdictional shift hypothesis.<sup>66</sup> This theory argues that agents switched from an inefficient legal system to a more efficient one, much like Tiebout sorting. Inefficiencies in a legal system arise from transaction and contracting costs, legal costs such as litigation and verification, and distortion of incentives. One could in fact use Tiebout sorting to state the theory more concretely. Assume there are two legal systems differentiated along costs they induce on commerce and trade. A given legal system, say the British common law, might be more efficient than the Ottoman law due to more secure property rights, more flexible inheritance laws or better

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<sup>65</sup>Kadı (2012) p. 213, CADN 166PO/D84/1: 16 November 1741; Kadı (2012) p. 182, 212, 214–5, 226, 247–8, 262, CADN 166PO/D84/7: 8 March 1767; Kadı (2012) p. 78, 182, 191, 202, 225, 226, CADN 166PO/D84/3: 10 September 1758; Kadı (2012) p. 230, TNA SP 110/87: Murray to Hayes, 1 November 1766, SP 105/188: 21 June 1782; Kadı (2012) p. 190–191, 210, 223, 230, 295, BOA Hatt 196 C, CADN 166PO/D84/15: 8 January 1780, 166PO/D84/18; Kadı (2012) p. 202, TNA SP 105/186; AN AE/B3/233: *Mission du baron de Tott*, Smyrna, 1777-1779, Yenaki’s *berat* was registered on 16 February 1780, BOA Hatt 196-9779 K.

<sup>66</sup>See Kuran (2004a).

verification technology (due to reliance on written evidence). Then, agents who have large expected gains from better law would be willing to pay a certain sum to go through this jurisdictional shift. In a market with a fixed supply of access to additional legal jurisdictions, agents would bid the price up, and people with relatively smaller expected gains would stay in the original jurisdiction. Now, suppose there are finitely many legal systems available. Then, Tiebout sorting would imply that agents with the highest expected benefits would place themselves in the most efficient legal jurisdiction. Since the supply is fixed and positions are auctioned off, agents with relatively smaller expected benefits would place themselves in the second-best, and so on. This theory implies an ordering of legal systems in their efficiency reflected by the *berat* prices. Furthermore, by revealed preference, those who could afford access but did not purchase it do not benefit from “better” law.

Indeed, even though all *berats* granted the same tax exemptions, the cross-sectional price variation implies that *berats* were not homogenous objects. The archival evidence makes this argument explicit. For instance, Dimitraki Vidalé, a Greek merchant in Smyrna, turned down a Dutch *berat* at 2,500 *kuruş* and purchased a French *berat* at 3,000 instead. A prospective *berath* in Latakia turned down an Austrian *berat* to wait for a British one to become available.<sup>67</sup>

In order to assess the impact of “better law” on prices, we need to be careful about alternative explanations for the systematic variation in *berat* prices across jurisdictions. *Berat* price is a function of the discount factor which depends on mortality and prevailing interest rates, the value of tax exemptions, the probability that the Sultan annuls the *berat*, the quality of arbitration and protection services which depend on the competence or willingness of the particular ambassador and consul, and finally the value of the legal system itself. Given this formulation, there are three possible sources of variation: the probability of *berat* annulment, ambassador and consul effects, and the legal system.

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<sup>67</sup>CADN 166PO/D84/4: 1 March 1759; TNA SP 110/46: pp. 126–7, [?] to Henry Shaw, 2 March 1784

Recall that a country's *berats* became void if war broke out with the Ottoman Empire. Such revocation might involve more than the loss of future benefits. When Napoleon invaded Egypt, the Porte repealed all French *berats*, followed by confiscations on French *berathls'* estates in Aleppo. *Berathls* either had to leave the city or buy other *berats* to shield themselves.<sup>68</sup> Thus, we would expect Austrian and Russian *berats* to be relatively cheaper, since they were much more likely to go to war with the Ottoman Empire.

*Berat's* value also depended on the ambassador and the consul who did the actual representation. Whenever local magistrates harassed *berathls* or an Ottoman subject sued protégés in the Turkish court, consuls represented *berathls* at the local court, and ambassadors at the higher court. An ambassador's influence at the Porte was critical in obtaining favorable verdicts for *berathls*.

For these reasons, a comparison of British and French *berats* is especially revealing. These two countries had comparable power, had about equal influence at the Sublime Porte, and were historically on friendly terms with the Ottoman Empire. However, their *berats* still show non-trivial variation, suggesting that agents displayed preference for French law over British law.

Finally, *berathls'* occupations also highlight the value of European law. The scattered data on applicants show that they were predominantly merchants, followed by *sarrafs* (bankers and moneychangers), artisans, shopkeepers, and brokers.<sup>69</sup> Thus, European law had value precisely for those involved in trade, commerce, and finance.

Kuran argues that the main source of inefficiency of the Ottoman law is the egalitarian inheritance law and the fact that Islamic jurisprudence had no concept of legal personhood. The latter is very unlikely. First, Kuran is overestimating legal personhood's availability. In this period, there were no general incorporation laws in Europe. Incorporation required special permission or char-

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<sup>68</sup>Hanna Andréa lost 10,000 *kuruş* to confiscation and switched to Swedish protection; Yussuf Ferra lost about 200,000 *kuruş* and obtained protection from Ragusa, Giabra Azouz lost 15,000 *kuruş* and acquired an unspecified country's protection, CADN 166PO/D1/29: 5 *Vendémiaire* XI.

<sup>69</sup>Each sale noted in the French archives notes the occupation, CADN 166PO/D1/1, 5, 7, 10, 18, 23; 166PO/D84/3, 4, 7, 15. Choiseul described the *berathls* as "almost all rich *sarrafs*, or bankers," cited in Eldem (1999) p. 282.

ters.<sup>70</sup> Being unavailable to *beraths*, such organizational forms could not be an incentive to buy *berats*. The alternative is the joint-stock company. The archival evidence suggests that *beraths* did not form or join such enterprises, either. First, they were barred from entering the Levant Company, which was the only candidate in the Levant. In fact, the Levant Company was not even a joint-stock company; it had no stock. Each member traded on his own account and paid fees to the Company. Thus, European merchants did not form these supposedly superior organizational forms, either.<sup>71</sup> Second, although sources do not explicitly state enterprise forms, the available data suggest that most *berath* firms were general partnerships, which had an equivalent form in Ottoman law.<sup>72</sup>

*Beraths* did have access to a new enterprise form that might have been otherwise unavailable: the merchant (or commercial) house. In the eighteenth century, foreign merchants introduced commercial houses, which became a common way for *beraths* to organize their firms. Comprising one or more partnerships, commercial houses were established for an indefinite period of time and were not tied to a single venture. Kuran describes commercial houses as precursors to joint-stock companies since they could transform to one by issuing tradeable shares. Although the Ottoman law did not specifically disallow such enterprises, Turkish tribunals had trouble adjudicating disputes arising from their function. If that was the case, using European law would indeed involve lower transaction costs to operate merchant houses. Some examples of *berath* merchant houses are Stefan & Abkar Nalbandoglu, Armenian *beraths* of France in Istanbul; Demetrio & Nicola Bachatari & Co.; Manuel Kiriaco de Panajoti; Mavrogordato's merchant houses in Izmir, Chios, and Amsterdam; Antonio Zingrilara; and French *berath* George Vitale's merchant house Vitale brothers & Co.<sup>73</sup>

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<sup>70</sup>General incorporation laws were introduced in France in 1867, Germany in 1860s–1870 varying by state, the UK in 1844 without limited liability and in 1855–56 with limited liability. See Guinnane et al. (2007) p. 692, Table 1.

<sup>71</sup>Walsh and of Merchants of England Trading to the Levant (1825) p. 6, also see BL Add MS 38229: ff. 145–71, a dissertation by F. Daniel on the Turkey trade, 23 March 1794

<sup>72</sup>Çizakça (1996) p. 50

<sup>73</sup>Kuran (2010) p. 202–204. TNA SP 110/43, p. 226: To Will Magee, 6 January 1775; SP 105/186; CADN 1666PO/D84/3: 10 September 1758; 1666PO/D84/7: 8 March 1767; 1666PO/D84/18: 3 March 1786; 1666PO/D84/15: 8 January 1780.

Having access to more flexible inheritance laws is another possibility. *Berathls'* privileges did not end with their demise, but rather after their estates' partition. Whenever a *berath* passed away, the consul would seal up the *berath's* estate, including his house, warehouse, and all his merchandise. The *berat* would return to the embassy or the Porte only after the heirs agreed on a division, which followed the deceased's will if one existed or an arbitration among the inheritors otherwise. Thus, for instance, French law could oversee a French *berath's* inheritance. Boogert shows that this is not necessarily the case. He cites several examples from the archives where the partition in fact followed the Islamic law.<sup>74</sup> Nevertheless, there are other cases that do suggest flexible estate division.<sup>75</sup>

Furthermore, *berats* also conferred on their bearers more secure property rights. The *berat* essentially shielded a deceased *berath's* estate from local magistrates' arbitrary confiscations. In response to the appropriations the local judge and other Ottoman officers made on a *berath's* estate following his demise, French *berathls* noted that consuls had sole jurisdiction over their *berathls'* inheritance.<sup>76</sup> The British consul in Aleppo remarked that he protected his *berath* Abdallah's estate and family "from the molestation of the Turkish justice for the usual time" before returning his *berat* back to Istanbul. Similarly, following the British *berath* Antun Balit's decease, the same consul sealed up Antun's estate "the usual way, [...] to secure the Heirs from the Interference of the Turkish Justice."<sup>77</sup>

The Porte's own competing *berat* sales reveal further evidence. In 1802, the Porte formed its own corps of *berathli* merchants called *Avrupa Tüccarı*, literally "Europe merchants," and started issuing associated patents in 1806. Its inception coincided with the Porte's rigorous attempts to suspend *berats* and other consular protections. Later, the government offered similar protection to its Muslim

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<sup>74</sup>Boogert (2005) p. 199, especially footnote 65; Boogert (2009) p. 378

<sup>75</sup>For example, Costachi Amiro CADN 166PO/D84/20: 14 January 1792; Stephan Agemi, TNA SP 110/53: f. 80, 28 October 1795.

<sup>76</sup>The deceased, Stefan Mardiros, had a *berat* of the Kingdom of Two Sicilies. The total amount of confiscation was 7,535 *куруş* and 107 Venetian sequins. CADN 166PO/D1/18: *Berathls* of France to Deperdriau [Consul of France in Aleppo], 19 December 1777.

<sup>77</sup>TNA SP 110/53: f. 12, 3 November 1791; SP 110/53: f. 47, 15 July 1793.

subjects as well, under the moniker *Hayriye Tüccarı*, literally “merchants of goodness.” Both groups had the same exemptions as the other *beratlıs*, including lower customs.<sup>78</sup> Furthermore, the Ottoman *berats* placed their bearers out of local courts’ reach. These merchants’ litigations followed European courts’ arbitration procedures closely.<sup>79</sup> Their privileges also extended to two agents, like the two *nefers* attached to *berats*.

The Porte priced its *berats* competitively. Bağış reports a price of 1,500–2,000 *kuruş*, which is evidently lower than the prevailing prices of European *berats* in the late eighteenth century. By 1806, five or six of these patents were already sold.<sup>80</sup> In 1810, *imperial beratlıs* numbered around 80.<sup>81</sup> In 1815, 151 such patentees existed. By 1835, the number had increased to 521, with another 453 procuring them between 1839 and 1861.<sup>82</sup>

We should not overestimate these figures as they indicate the total number of registrations rather than the number of imperial *berats* in circulation. They are in fact fairly modest compared to the corps of European *beratlıs*. Although the imperial *berats* had some initial success in some places, namely in Aleppo, the reform failed to inspire confidence in non-Muslims, who might have found the Ottoman’s promise to respect these privileges non-credible.<sup>83</sup> Since the Porte simultaneously started the suppression of European *berats*, we cannot determine the extent to which the Sultan’s *berats* depressed the demand for European *berats*, if at all. Still, imperial *berats*’ apparent failure suggests that *berats* had value beyond tax exemptions, arbitration services and representation by other merchants.

Overall, the systematic price variation across countries shows that the market valued each coun-

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<sup>78</sup>*Avrupa Tüccarıs* were not exempt from the *haraç* duty, but the amount was very modest and meant to emphasize that they were Ottoman subjects.

<sup>79</sup>Bağış (1983) pp. 65–70, see Masters (1992) for a comprehensive discussion on *Avrupa Tüccarıs* and *Hayriye Tüccarıs*.

<sup>80</sup>TNA, FO 78/50: f. 19–20, Report on Barats, 24 April 1806.

<sup>81</sup>Çizakça (1996) p. 206.

<sup>82</sup>Masters (1992) p. 581.

<sup>83</sup>Rey (1899) p. 282.

try's *berat* differently. I discussed three possible aspects of law that agents might have found profitable to induce switching jurisdictions: Enterprise forms, inheritance law and secure property rights. Enterprise forms are unlikely, but there is mixed evidence on flexible inheritance law. Finally, confiscation risk and insecure property rights could have led to jurisdictional shift. However, it is not evident how that could affect the price variation. We need detailed data about *beraths*' contracts, firms, and estates in order to precisely answer these questions. Unfortunately, given the paucity of archival material or such merchants' private collections, these issues remain unresolved.

#### 4.4 Forum Shopping

One final motive for buying a *berat* could be forum shopping, where a litigant chooses the most favorable judge to hear or defend his case over a set of possible courts. That is, *beraths* chose different forums not for efficiency gains, but to extract rents from their partners. For instance, a *berath* who would like to obviate his contractual obligation could defect to other jurisdictions either to get a favorable verdict or delay judgment. Verdict disparity across forums could be due to the underlying law itself, or simply court bias.

This hypothesis states that there is an option value of having access to multiple legal systems and courts, independent of their efficiency. The law itself does not have to be different, since even adjudication delay implies gains for a defendant, whose legal choice was binding.<sup>84</sup> For this hypothesis to hold, the agent should be able to use his jurisdictional options as a credible threat. Forum shopping has a natural testable implication: incentives to purchase multiple *berats*.

Indeed, compared to Europeans, Muslims or other non-Muslims, *beraths* had richer legal options for contracting and dispute resolution, which they fully exploited. The French ambassador Vergennes noted French *beraths*' defections in his correspondence.<sup>85</sup> Later, Sir Robert Liston, the British

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<sup>84</sup>Consular adjudication followed the *forum rei* principle. See Boogert (2003).

<sup>85</sup>"If the law of France harms and ruins them, they will resort to Turkish law" (*Archives de la Chambre de Commerce de Marseille*, J 168, Vergennes to the Chamber of Commerce, 22 January 1768, cited in Eldem (1999) pp. 282–3.

ambassador in Constantinople, revealed the extent of forum shopping in his report:

Men of profligate character procured Berats, to skreen [*sic*] them from the punishment of the Law, to enable them to avoid the payment of their just debts, or perhaps to oppress an innocent neighbour. [...] And there are instances, not infrequent, that when one minister [...] has determined to withdraw his patronage, and to deliver him over to the Tribunals of the Country, there has been found another minister ready to frustrate the good intention, by an adoption of the criminal.<sup>86</sup>

Anecdotes of litigations give many concrete examples of forum shopping. Essaid de Massé, a Dutch *berath* who did extensive trade with the Dutch Republic, declared himself an Ottoman subject during his bankruptcy despite the litigation having started in the Dutch consular court. In fact, he switched courts several times.<sup>87</sup> The British ambassador Ainslie advised one of his *nefer fermanh* to suspend the *ferman* temporarily in order to use the Ottoman jurisdiction.<sup>88</sup>

In addition, agents attempted to acquire multiple *berats* or *fermans*. In Aleppo, c. 1755, a bankrupt Dutch *fermanh* solicited a Venetian *berat* or *ferman* to against possible sequestration of his patent. When the British ambassador discovered some of his *berath*s had acquired other countries' *berats*, he ordered them to relinquish the additional *berats*. Similarly, some purchased *berats* despite having protection through their fathers' *berats*. For instance, Shiudiac and Aida were both Dutch *dragomans* in Aleppo, with their sons respectively having Austrian and British *berats*.<sup>89</sup>

Furthermore, a *berath* or a *berath*'s son could renounce his patent and purchase another country's *berat*. Yussuf Karalı, a merchant and French trader Pons's agent in Aleppo, abandoned the Swedish protection he had through his father's *berat*, applied to the Turkish tribunal, only to buy a *berat*

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<sup>86</sup>TNA FO 78/16: ff. 90-91, Liston to Grenville, 25 April 1795.

<sup>87</sup>CADN 166PO/D84/8: 18 August 1768, 1 February 1769.

<sup>88</sup>TNA, FO 261/6: Ainslie to DeVezin, 11 April 1789.

<sup>89</sup>TNA SP 110/32: f. 128: 10 October 1755; FO 261/6: Ainslie to Moore, 5 March 1790.

from Spain later, all during the adjudication of his debt payment.<sup>90</sup> Another example is Antonio Zingrilara. He was an Ottoman Greek who settled in Amsterdam and obtained Dutch citizenship in 1759, but had a dispute with the Dutch later. He applied to the Turkish court and in the end the Dutch revoked his citizenship in 1768. During this process he purchased a French *berat* (1767), and even solicited a British *berat* (1768) after his purchase.<sup>91</sup>

A *berath* could also get another country's *berat* when the ambassador revoked the original one. In 1782, when the British ambassador Ainslie withdrew his *berat* from a British protégé who the Porte found guilty of treason, the *berath* placed himself under Austrian protection instead. Similarly, Nasrallah Kassab's son Gibrael purchased a *nefer ferman* from Denmark after Ainslie revoked his British *nefer ferman* on grounds of his "improper conduct."<sup>92</sup>

Furthermore, we see clear diversification of *berats* within partnerships. A business could comprise partners with different *berats*. A good example is the partnership of Sader brothers and Anton Diab, who had *berats* from Britain and the Dutch Republic.<sup>93</sup> The Karalı family in Aleppo was under the protection of several powers. The father Petros Karalı had a Swedish *berat*. His son Yussuf, as noted earlier, had one from Spain, and his other son Yeperi a Venetian *berat*. Petros had a brother İlyas who had a Dutch *berat*. Nasrallah Kassab's three sons each had *berats* of Denmark. Two of them resided in Aleppo, the other in Salonica. Two other Kassabs in Aleppo were British and Prussian *beraths* but we cannot say for certain they were from the same family. The British *berath* Samaan Kassab's father, Elias Kassab, had an Austrian *berat*. Anton Diab and his son Petros had British and Swedish *berats*, respectively. These cases are especially revealing, since the sons' *berats* would be totally redundant from a tax exemption point of view. Two members of the Frangopoulos

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<sup>90</sup>CADN 166PO/D1/22: Amé to the Ambassador, 19 April 1784, 17 June 1784; 166PO/D1/23: 1 June 1786.

<sup>91</sup>Boogert (2006) pp. 131–2, CADN 166PO/D84/7: 8 March 1767, TNA SP 110/87: Murray to Hayes, 9 June 1768.

<sup>92</sup>TNA, FO 78/3: f. 247-248 Ainslie to Lord Grantham, 10 October 1782; FO 261/4: Ainslie to Abbott, 19 July 1782, BOA C/HR 2898-3.

<sup>93</sup>CADN 166PO/D1/1.

family in Salonica, possibly brothers or father-and-son, had *berats* from France and Austria, *c.* 1761. Brothers Iakov and Abraham Frances, established in Salonica, had *berats* of Austria and Ragusa, respectively, *c.* 1761. The partnerships between *beraths* of different European countries are too numerous to list exhaustively, with some examples provided in Section 4.2. One other example is Yusuf Dwek Cohen and Minas Uskan, Dutch and British *beraths* in a partnership in 1780s.<sup>94</sup>

This is strong evidence of forum shopping. Agents desired additional legal options precisely to have a credible threat of defection whenever parties disputed the contract. The looming threat of rent extraction could have discouraged agents without *berats* from participating in such a market.<sup>95</sup> Werry, a British Consul in Izmir, simultaneously drew attention to the differences between Turkish and European law, and justified British reluctance to trade with local non-Muslims (including *beraths*) by non-Muslims' lack of commitment to European law *ex ante*.

It is well known, that there exists a wide difference between the Code of Turkish Laws, and the Laws & usages of Europe. It is also a fact, that all Subjects of Turkey [*sic*], Greeks, Armenians, Jews, &c, are always amenable to the Turkish Tribunals [...]. No written [*sic*] engagement under their head—no act past in a foreign Cancellaria or before a European Magistrate, is binding for them [...]. To obviate this, it would be highly useful [...] that all Subjects of Turkey [*sic*] entering, of their own accord, into an Engagement, transaction, or Contract whatever in matters of Trade, with any of the European Factories & under the Sanction & influence of the Laws of the Nation to which that Factory belongs, shall be obliged to abide by that engagement, transaction, or Consent, [...] without being at liberty to appeal, or have recourse to the help of the Turkish Law, in order to elude the consequences of such Engagement for when likely to prove

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<sup>94</sup>BOA HAT 196 B, C, D, E, G, H, J, K; BL Add MS 45933: f. 122, Drummond [consul at Aleppo] to Baron de Penklern, 2 April 1753; IAM K. 94 33/34; Boogert (2005) p. 267.

<sup>95</sup>In a companion paper, I construct a formal model of legal pluralism and its implications on trade and investment.

inconsonant with their own advantage, & profit.<sup>96</sup>

## 5 Conclusion

This paper analyzed a particular facet of legal pluralism in the eighteenth century Ottoman Empire: the sale of exemption licenses called *berats* by the European embassies and consuls. These patents provided various tax exemptions as well as access to European institutions and jurisprudence. The price data I constructed using primary sources yield two strong results: First, tax exemptions cannot explain the high price. Second, the price variation across countries suggests that the market ranked the quality of services and privileges these *berats* granted. Possible sources of heterogeneity include ambassadors' influence, the probability of war, and the efficiency of the legal system and institutions. A comparison of Great Britain, France and the Dutch Republic is especially revealing, since these countries enjoyed similar levels of influence and were very unlikely to go to war with the Ottomans. However, their *berats* still display significant price variation. This evidence suggest that the difference in their legal/economic institutions led to the price wedge.

*Beraths* also exploited their legal options extensively. Both anecdotal evidence and actual litigations show that *beraths* switched courts during disputes very often. This switch was not systematic in one direction, either; a *berath* was just as likely to defect from a British court to an Austrian tribunal as to a Turkish court. I argue that this led a distortion of incentives, resulting in higher demand for *berats* and the exit of non-*beraths* from trade.

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<sup>96</sup>TNA, FO 352/1: p. 400, Memorandum, 5 January 1811.

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Table 1: The Price of *Berats*

	Great Britain			France		Austria	
	Nominal ( <i>kurus</i> )	Real (1751 <i>kurus</i> )	Nominal Sterling	Nominal ( <i>kurus</i> )	Real (1751 <i>kurus</i> )	Nominal ( <i>kurus</i> )	Real (1751 <i>kurus</i> )
1751–53	2,750 (0) [1]	2,750	393–550	3,000 (0) [1]	3,000	2,300 (0) [3]	2,300
1754–56	2,750 (0) [1]	2,693	393–550	3,000 (0) [1]	2,938	2,267 (208) [3]	2,219
1757–65				3,000 (0) [4]	2,359		
1766–73	2,550 (70) [4]	2,022	319	3,000 (0) [3]	2,379		
1774–79	3,236 (304) [9]	2,433	324–360	4,000 (0) [2]	3,007		
1780–87	4,000 (0) [6]	2,759	425	5,000 (0) [1]	3,448	3,000 (0) [2]	2,069
1789–93	4,000 (324) [7]	1,904	361				
1794	5,000 (0) [1]	2,035	417				

Reported figures are means whenever there is more than one observation. Standard deviations are displayed in parentheses, and number of observations in brackets. Real prices and nominal prices in pounds sterling are calculated using the silver content data and the exchange rate figures from Pamuk (2000) p. 163, 168.

*Source.* TNA FO 261/3–7, SP 97/52, SP 110/87, SP 110/45–6; BL Add MS 38229, 45933; CADN 166PO/D1/1, 5, 7, 10, 18, 23, 166PO/D84/3, 4, 7, 15; AN AE/BI/998.

Table 2: The Total Number of *Berats* in Circulation

	1703	1730	1754	1757	1774	1789
France	35	41	48	46	51	46
Great Britain	15	34	45	43	43	43
Dutch Republic	24	28	26	30	29	34

Table 3: The Number of *Berats* in Istanbul, Izmir, and Aleppo

	1703	1730	1754	1757	1774	1789
France						
Istanbul	11	17	12	15	9	14
Izmir	8	8	5	4	4	6
Aleppo	–	2	7	8	10	5
Great Britain						
Istanbul	10	14	16	11	11	10
Izmir	1	6	3	5	7	6
Aleppo	2	5	11	13	10	14
Dutch Republic						
Istanbul	15	16	7	3	5	5
Izmir	6	7	6	10	7	9
Aleppo	1	2	7	9	14	12

*Source:* Boogert (2005) p. 88. Cited primary sources are BOA, ED 27/2 (France), 35/1 (Great Britain), 22/1 (Dutch Republic).

Table 4: The Number of Protégés in Aleppo *c.* 1768

	<i>Beraths</i>	<i>Fermanhs</i>	Children	Total
France	18	36		
Great Britain	14	28		
The Dutch Republic	11	22		
Venice	5	10		
Total	48	96	58	202

Protégés of France include those of Sweden and the Kingdom of Two Sicilies, Great Britain includes those of Austria. The third column reports the number of protected children through their fathers' *berats*.

Source: CADN 166PO/D1/10

Table 5: The Number of *Berats* in Circulation *c.* 1797

	Istanbul	Izmir	Aleppo	Salonica	Other	Total
France	17	6	6	3	17	49
Great Britain	14	6	13	4	9	46
The Dutch Republic	5	9	9	6	2	31
Venice	1	1	6	1	1	10
Austria	–	1	–	2	5	8
Prussia	4	1	7	2	4	18
Denmark	4	1	2	1	5	13
Sweden	5	8	5	3	26	47
The Kingdom of Two Sicilies	3	4	5	5	14	31
Total	53	37	53	27	83	253

Source: BOA Hatt 196/9779 B, C, D, E, G, H, Í, J, 196/2898; Historical Archives of Macedonia K. 172 22/24 (Βασδραβελλη, I. *Ιστορικα Αρξεια Μακεδονιας*, 1952. pp. 352–3)