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VIA E-MAIL: culprop@state.gov

Jay I. Kislak, Chairman
Cultural Property Advisory Committee
Cultural Heritage Center
United States Department of State
301 4th St., SW
Washington, DC 20547

RE: *Renewal of Agreement with Republic of Cyprus and Possible Inclusion of Coins*

Dear CPAC Members:

I am writing on behalf of the American Numismatic Association (ANA) to oppose efforts to impose import restrictions on numismatics including coins, paper money, medals and tokens in the consideration of the renewal of the agreement between the Government of the United States and the Government of Cyprus. The ANA is a nonprofit, educational organization chartered by the United States Congress to promote the study and collection of money and related items, for research, interpretation and preservation of history and culture from ancient times to the present. The ANA has almost 33,000 active members in the United States and our numbers are growing. Many of our members collect Cypriot coins which would include many Greek, Roman, Medieval or Early Modern coins of a type that circulated in Cyprus.

The ANA is deeply concerned that the application of import restrictions to numismatics and specifically coins will adversely impact the longstanding legitimate trade and collection of numismatic items. Typically, coins do not carry any provenance with them, particularly of the sort contemplated by US Customs under the governing statute. Thus, a legitimate holder of numismatic material may not be able to establish the necessary historical ownership of legally purchased numismatics to avoid forfeiture of his or her collection under the contemplated import restrictions that would be included in the agreement with Cyprus.

U.S. citizens have enjoyed coin collecting, including ancient Cypriot numismatics, since the American Revolution (and citizens of the Colonies enjoyed coin collecting before the revolution). President John Quincy Adams was a serious collector of ancient Greek and Roman coins. Other Presidents such as Thomas Jefferson and Theodore Roosevelt have also appreciated owning the very same type of coinage that would be covered under any proposed restrictions. The ANA trusts that the Cultural Property Advisory Committee (CPAC) will consider the legitimate interests of coin collectors, coin dealers, and all Americans interested in private ownership of ancient money in addressing this issue.

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Prior to this most recent request, there have been no import restrictions on coins and numismatic material from the Republic of Cyprus. There has been no policy change and there is no supportable reason that could be advanced to depart from this prior position. Given the harm the imposition of import restrictions would cause to legitimate collectors and individuals dealing in coins, the ANA strongly encourages CPAC to recommend against the contemplated import restrictions on numismatics.

To impose import restrictions on Cypriot coins and numismatics could have an adverse impact on the ANA in its educational goals. It has the potential to limit and/or eliminate an interest in collecting and learning from ancient numismatic material as such could be deemed at some future point to be illegal to own. Likewise, researchers and scholars knowledgeable in ancient numismatics will likely not participate in educational programming in the United States as to do so, using Cypriot numismatics, could subject them to forfeiture of their materials. Import restrictions as contemplated could have a significant adverse influence on the numismatic community in the United States.

Certainly, import restrictions on coins would also discourage foreign participation in our numismatic conventions held in different cities throughout the United States. These shows attract foreign numismatic firms and collectors who display numismatic material. If it is difficult for them to import this material legally into the United States, they likely will not attend depriving collectors and researchers of their legitimately owned materials, their knowledge and their expertise. American collectors will lose the benefit of these person to person contacts with numismatists from around the world and our historical knowledge will be all the poorer for it.

On behalf of the ANA and its almost 33,000 members, I hope that you will continue to hold the position previously taken by CPAC and recommend against import restrictions on numismatics. Should you have any questions, please do not hesitate to contact me.

Sincerely,

CHRISTOPHER CIPOLETTI
Executive Director

cc: ANA Board of Governors