

February 5, 2007

Mr. Jay I. Kislak, Chairman
Cultural Property Advisory Committee
Cultural Heritage Center; Room 334
U.S. Department of State
301 4th Street, SW
Washington, DC 20547

Subject: Renewal of MOU with the Republic of Cyprus and Possible Inclusion of Coins

Dear Mr. Kislak:

My purpose of writing you is to oppose any effort to impose import restrictions on any coins at any time.

I wish to specifically object to the present effort to place restrictions on the legal importing and sale of coins directly associated with Cyprus as the original location of origin.

Ancient coins struck on the island of Cyprus are common, with many thousands of examples known to exist in both museum cabinets and private collections. They have been collected for centuries, initially in Europe and later also in the United States, Canada and other nations with a significant European heritage.

Ancient Cypriot coins, in fact, exist in such significant quantity that they can not all be adequately studied or preserved by academics and museums. Thus, without the dedication and efforts of collectors and dealers, both numismatic research and preservation of these interesting economic tokens from the past would be neglected.

I would also hasten to point out another important reason for opposing the proposed restrictions, that being the practical difficulty of determining the origin of coins that trade in the numismatic marketplace. Although Cyprus maintains that all coins from Cypriot mints belong to Cyprus, this is really not a supportable intention. Under the law, only coins discovered on Cypriot soil are considered to be of Cypriot origin. Unfortunately, it

is almost always impossible to determine the place of discovery of a coin by examining it.

Please ensure that the American numismatic community will be able to continue collecting and importing Cypriot coins just as their Cypriot counterparts do. No good reason can be advanced to depart from CPAC's prior recommendation against imposing import restrictions on coins of potential Cypriot origin, particularly given the grave harm that imposing import restrictions would cause to collectors and individuals legitimately dealing in and collecting ancient coins.

It should be, I firmly believe, incumbent upon Cyprus as a governing entity to prove that a given coin has been illegally exported from their territory, rather than shifting the burden of proof onto the holder of the artifact.

In the United States, there should be no blanket exclusion against the importation of coins of Cypriot origin unless it is specifically demonstrated that they were fraudulently removed from Cyprus.

Sincerely yours,

Clifford Mishler