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Via e-mail: culprop@state.gov

Mr. Jay I. Kislak, Chairman
Cultural Property Advisory Committee
United States Department of State
Room 334
301 4th St., SW
Washington, DC 20547

Re: Renewal of MOU with Republic of Cyprus and Possible Inclusion of Coins

Dear Mr. Kislak,

I am writing on the subject of import restrictions for coins minted and found in Cyprus, which are over 250 years old. I have been working for over 15 years as a curator and scholar on ancient Greek coins in the British Museum and the American Numismatic Society. I am currently the Executive Director of the American Numismatic Society, but the views expressed here are my own and do not reflect any position of the institution or its members.

My work as a numismatist is mainly concerned with coinages of the Archaic and Classical period (7th -4th century BCE), on which I have written extensively. As editor of *Coin Hoards*, a publication that I edit with my colleague Andrew Meadows, I have conducted extensive research on coin hoards. I work with colleagues in many other countries as well as with collectors and dealers of coins. My comments on import restrictions are largely limited to the coins of the Archaic and early Classical period found in Cyprus.

The value of Cypriote coins within an archaeological context is undisputable. The earliest, and one of the most important examples for late 6th century numismatics is the find of coins in the Apadana deposit in Persepolis (Iran). There are numerous other examples from Turkey, Afghanistan, Egypt, and the Near East, including about a dozen hoards found in Cyprus, that are of immense value for the understanding of early numismatics. The role of Cypriote coins in the early context cannot be stressed enough. Cyprus was one of the first places to mint coins extensively, perhaps as early as 530 or 520 BCE.

In recent years many Cypriote coins have appeared on the coin market, most of which have no context and are therefore of little value for our understanding of their history. For archaic coins, a find spot - ideally a properly recorded one - is essential. Furthermore it should be pointed out that many of the early Cypriote coins are so rare that many of the coins have new types or, crucially, names of kings. The kings of the city of this island are in some cases only represented through a few existing coins. In this respect, coins of this period fall in the category of the most significant historical items that I know. The notion that such coins are just multiples and thus of little historical interest is simply wrong. I would go even further in saying that the understanding of archaic and early classical coinage, including that of Cyprus, needs some archaeological, secure finds of coins and other materials in order to make significant progress. Jonathan H. Kagan stated in a 1994 article on early Cypriote coinage that “until we have better archaeological evidence (i.e. for the date of the Artemesium deposit), it comes down to personal judgment as to whether one believes that the introduction of silver coinage was a gradual evolving process...” (‘An Archaic Greek Coin Hoard from the Eastern Mediterranean and Early Cypriot Coinage’, *Numismatic Chronicle* 154 (1994), p. 17-52. As long as we are lacking publications of excavation finds, ideally of larger hoards of early silver and indeed electrum coins, scholars and anyone else interested in these early monetary history will be deprived of secure evidence for their interpretations.

The proposal distinguishes between two fundamentally different groups: coins found in Cyprus and coins minted in Cyprus. I would strongly urge members of the committee not to consider any import restrictions of coins minted in Cyprus. A survey of coins minted in Cyprus, based on the standard work *An Inventory of Greek Coin Hoards* and *Coin Hoards*, shows that most coin hoards containing coins from the 6th to the 5th century are found outside Cyprus. By giving coins to the Republic of Cyprus even if they are found in archaeological contexts outside this country, the argument for the protection of archaeological sites would be turned on its head.

I also would like to address the issue of how easy it would be to enforce such import restrictions. For the area of ancient Greek coins, I would hold that it is virtually impossible to train a custom officer to identify a Cypriote coin, or indeed any other sort of specific coin. Through my work at the American Numismatic Society I have occasionally had the opportunity to assist Home Land Security agents with parcels of confiscated coins. They admitted to me that they and the border agents were at a loss with the identification of such items. Ironically, the confiscated items were sometimes not even genuine ancient coins. If import restrictions for coins are put in place, it is essential that any action by agents needs to be carried out on an informed basis, which could be upheld in a US court of law.

What is clearly needed for the United States and other countries is a strict system of invoices and paper work. Each object entering the US should be accompanied by a proper

invoice which states where it was purchased. I often hear that this would be impossible for coins, but it should be noted that for objects less than 100 years old it already exists and works in the US. Large hoards of illegally exported materials would stand out immediately, and US law enforcement should concern itself with these items, not with old coins found in the 19th century, which were circulating for decades in auctions.

Secondly, it is essential that countries such as the Republic of Cyprus deal with the looting of archaeological sites in their own country. What is needed is a law on the lines of the British Treasure Trove law, which has almost eliminated the black market in British antiquities. While almost everything gets recorded, not everything is retained for museums but re-enters the collector market. Thus items, including coins, which are deemed valuable for the heritage of Britain remain in the country, and more common items are sold after being preserved for scholarship. Without such or similar laws, the market for antiquities and coins will just go underground, or into e-Bay, which I personally view as the most difficult area to police.

Based on the above comments I support limited restrictions on import of coins which can be shown in a court of law to be illegally exported from the Republic of Cyprus. I would also not oppose import restrictions of coins without any paper work or invoices, if there is sufficient evidence that they have been illegally removed from Cyprus. I oppose the restrictions on import of coins, which were minted in Cyprus but have no other discernable connection to the Republic of Cyprus, or indeed of Cypriote coins, which can be proven to originate from older sales.

In closing I would urge the committee to consider more effective ways of protecting archaeological heritage than by considering nationalistic requests from various modern states. For coins and other items such an approach is flawed and ultimately serves nobody. The current debate and its belligerent tone is a sad indicator that the collector/dealer community and the archaeological lobby have failed to educate each other. I strongly urge the committee to take a leadership role in opening a meaningful discussion on the issue of cultural property.

Yours truly,

Ute Wartenberg Kagan