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February 6, 2013

Cultural Property Advisory Committee
U.S. Department of State
2200 C Street, N.W.
Washington, D.C. 20522

Re: Renewal of United States- Cambodia Memorandum of Understanding

Dear Committee Members:

As President of the Lawyers' Committee for Cultural Heritage Preservation (LCCHP),¹ I submit this letter in support of the proposed second five-year extension of the United States-Cambodia Memorandum of Understanding. The *only* criterion for extension of an agreement under the Convention on Cultural Property Implementation Act (CPIA) is that the conditions that justified the original bilateral agreement still exist. Section 303(e), 19 U.S.C. § 2602(e). LCCHP submits that Cambodia meets the four criteria for renewal contained in Section 303(a)(1)(A)-(D), 19 U.S.C. § 2602(a)(1)(A)-(D).

I. The first determination addresses the *jeopardy posed to the cultural patrimony of Cambodia through continued looting of archaeological materials at issue*. Cambodia has, over the past five years, continued to suffer widespread looting of its cultural property. The crisis stems from numerous sources, both within and outside of Cambodia, and emphasizes the difficulties of suppression based on Cambodia's efforts alone and the necessity for internal assistance in the form of import restrictions.

The Royal Government of Cambodia, international governmental organizations like UNESCO, nongovernmental organizations like Heritage Watch, and individual

¹ LCCHP is a not-for-profit organization that fosters the stewardship of the objects, places, and traditions that define us as societies, nations, civilizations, and even human beings.
(<http://www.culturalheritagelaw.org/>).

experts like Dougald O'Reilly note that looting of prehistoric and historic sites in Cambodia has reached "alarming levels" in recent years, with a "sharp increase" in the pillage of prehistoric materials in the northwest regions since 2000.² Cambodia's newfound political stability at the end of the twentieth century allowed for an increase in both tourism and smuggling of antiquities in areas of the country that had been inaccessible for decades because of war and concentrations of landmines. Although immense national and international efforts have been made to secure the greatest temple complexes in these areas (including Angkor, Koh Ker, Banteay Chhmar, Preah Vihear, etc.), looting continues, often at minor temple sites that are geographically remote, undocumented, and unguarded.³

In addition, new sites have been discovered, and previously unknown artifacts are often excavated; this trend increases the likelihood that objects will be snatched by looters as soon as they are discovered, and makes the job of effectively tracking cultural material virtually impossible. A 2009 report documents several Bronze-Iron Age burial sites that were discovered only in the last decade, including Koh Ta Meas near Angkor, Village 10.8 in Kampong Cham Province, and Bit Meas and Prohear in Prey Veng Province.⁴ These prehistoric cemeteries contain between twenty-five and sixty individual graves; the presence of gold and other precious burial offerings resulted in sites being picked apart by looters. In 2011, UNESCO highlighted the case of Phnum Snay in Banteay Meanchey Province, which has suffered continuous "widescale looting." The looting in this instance was especially damaging to a unique pre-historic burial ground; nine burials and over 300 artifacts have been discovered by archaeologists, who consider these contents "vital" to further understanding the ancient Khmer empire. The looting, however, destroyed a large portion of the site before it could be documented, representing cultural knowledge that has been "lost forever."⁵

Temples such as those of Preah Khan Kompong Svay, part of a busy monastic complex in the 10th century, now lie completely ransacked, showing damage from the dynamite, hammers, chisels, chain saws, and weapons that have been used to remove pieces of the architecture.⁶ APSARA (the Authority for the Protection and Management

² Sylvain Gharbi, "Khmer Heritage Plundered," Phnom Penh Post, Jan. 18, 2013, <http://www.phnompenhpost.com/7days/2936-khmer-heritage-plundered>. Heritage Watch "is a non-profit organization dedicated to the preservation of Southeast Asia's cultural heritage." See www.heritagewatchinternational.org.

³ Cambodia has been called a "looter's paradise." Lawrence Osborne, "Cambodia's Undiscovered Temples," Condé Nast Traveler, Aug. 2012, <http://www.cntraveler.com/features/2012/08/cambodian-temples-phnom-penh-ta-prohm-angkor-borei>.

⁴ Andreas Reinecke et al., The First Golden Civilization of Cambodia: Unexpected Archaeological Discoveries (2009), http://www.mcfa.gov.kh/documents/tangible_culture/EngFirstGoldenCivCamb.pdf.

⁵ Archaeological Sites Now Under Threat: The Case of Phnum Snay, UNESCO Office in Phnom Penh, Sept. 19, 2011, http://www.unesco.org/new/en/phnompenh/about-this-office/single-view/news/archeological_sites_now_under_threat_the_case_of_phnum_snay-1/.

⁶ Gharbi, supra note 2.

of Angkor and the Region of Siem Reap) reports that such damage is often the work of organized looting operations which—once a temple’s movable artifacts have been removed—employ local villagers to remove pediments, lintels, and stone reliefs with chain saws and arrange for the pieces’ transport into Thailand.⁷ Although the work is often done by impoverished locals, it is often organized by by sellers who arrange for transport of the items to foreign markets.⁸

Tourists also have removed protected artifacts from the country. Although some purchase these looted items from local merchants, others engage in amateur archaeology, scavenging small souvenirs from sites; a 2005-2007 inventory by the Angkor Conservation Office reports that most of these objects are small Angkorian sandstone carvings. Notably, according to Cambodia’s Ministry of Tourism, Americans, in fact, accounted for the greatest percentage of non-Asian visitors of any country.⁹

The easily portable and concealable nature of looted artifacts allows for many items to leave Cambodia undetected, although some are confiscated by police. In late 2010, for example, two men in Banteay Meanchey Province were charged with smuggling after purchasing ancient deity statues in Siem Reap and attempting to carry them across the border into Thailand.¹⁰ In 2011, two ex-government officials were charged with drug trafficking and illegal weapons possession; during the search, police also recovered a 12th-century bronze Angkorian artifact believed to have been smuggled from the Cambodia-Thailand border, where one of the officials formerly patrolled. (The officials were convicted in Phnom Penh Municipal Court in 2012.)¹¹

Just last month in January 2013, police raided a Phnom Penh antique shop and recovered several ancient bronze ceremonial ornaments that had been stolen weeks earlier from a Siem Reap pagoda. Although the raid was successful, only a fraction of the twelve stolen items, with a total estimated worth of \$5,000, were found.¹² In the same week, the split head of a stone lion statue was discovered near a small 10th century temple close to the Koh Ker complex in the Preah Vihear province. These incidents, representing

⁷ “The Fight Against Looting,” APSARA, http://www.autoriteapsara.org/en/apsara/about_apsara/police/looting.html.

⁸ Id.; Gharbi, *supra* note 2.

⁹ Tourism Statistics Report: November 2012, Cambodia Ministry of Tourism, http://www.tourismcambodia.org/images/mot/statistic_reports/tourism_statistics_november_2012.pdf.

¹⁰ Buth Reaksmeay Kongkea, “Charges for Two Men for Artefact Smuggling,” Phnom Penh Post, Nov. 19, 2010, available at <http://khmernz.blogspot.com/2010/11/charges-for-two-men-for-artefact.html>.

¹¹ Buth Reaksmeay Kongkea, “Ex-Governor Gets 12 Years in Jail,” Phnom Penh Post, July 4, 2012, <http://www.phnompenhpost.com/2012070457185/National/former-governor-gets-12-years-in-jail.html>.

¹² Kim Sarom & Danson Cheong, “Antiques Shop Raid Nets Loot Stolen from Siem Reap Pagoda,” Phnom Penh Post, Jan. 24, 2013, <http://www.phnompenhpost.com/2013012460962/National/antiques-shop-raid-nets-loot-stolen-from-siem-reap-pagoda.html>.

a mere fraction of the looting that regularly occurs, indicate the state of constant danger that faces Cambodia's cultural patrimony.

II. The second determination concerns the *measures that Cambodia has taken to protect its cultural heritage*. Cambodia has long played an active role in safeguarding its property through legislation, enforcement, education, creation of inventories, and international cooperation.

The government began drafting new legislation to penalize the destruction, theft, and illicit export of its cultural property in the early 1990s, and such laws were made permanent in 1996, when Cambodia enacted its overarching Law on the Protection of Cultural Heritage, which criminalizes both looting and the export of protected antiquities.¹³ In furtherance of the World Heritage Site designation for Angkor (sought by the Cambodian government and granted in 1992), Cambodia also issued a Royal Decree for the Creation of APSARA.¹⁴ The long-term goal of APSARA is to put Cambodians in charge of protecting their heritage through several national initiatives. One such initiative is to relocate artifacts that have been stolen or are especially vulnerable to future theft to the Angkor Conservation Office or National Museum for safeguarding.¹⁵

In addition to APSARA, the government has also issued decrees for the creation of a zoning system of protection and management for archaeological sites in the Siem Reap/Angkor region and the Angkorian site of Koh Ker.¹⁶ Given the pervasive nature of the problem, such laws are admittedly difficult to enforce. The government thereby created the Cultural Heritage Police (CHP) in 1997, an enforcement team designed to work closely with APSARA to prevent the illicit buying, selling, and transport of cultural heritage.¹⁷ This special unit is devoted to the protection of the Angkor region in collaboration with authorities of the Siem Reap Province, and has received training from

¹³ Law on the Protection of Cultural Heritage, Jan. 25, 1996, available at http://www.autoriteapsara.org/en/apsara/about_apsara/legal_texts/decreed4_text.html. The unauthorized excavation or export of cultural objects is punishable by imprisonment and a fine "equal to the value of the cultural object in question."

¹⁴ Royal Decree establishing a National Authority for the Protection and Management of Angkor and the Region of Siem Reap, named APSARA, Feb. 19, 1995, available at http://www.autoriteapsara.org/en/apsara/about_apsara/legal_texts/decreed1_text.html.

¹⁵ Sarom & Cheong, *supra* note 12.

¹⁶ Royal Decree establishing Protected Cultural Zones in the Siem Reap/Angkor Region and Guidelines for their Management, May 28, 1994, available at http://www.autoriteapsara.org/en/apsara/about_apsara/legal_texts/decreed3_text.html; Royal Decree Establishing the Site of Koh Ke, June 5, 1994, available at http://www.autoriteapsara.org/en/apsara/about_apsara/legal_texts/decreed6_text.html.

¹⁷ Sub-decree Establishing the Special Police Corps for the Protection of Cultural Heritage, Oct. 8, 1997, available at http://www.autoriteapsara.org/en/apsara/about_apsara/legal_texts/sub_police_heritage.html.

France, UNESCO, and the Art Crime branch of the FBI.¹⁸ The CHP recently demonstrated its effectiveness in the successful undercover operation mentioned above that recovered several ancient artifacts from a Phnom Penh merchant.¹⁹

Cambodia has also collaborated with educational institutions and foreign governments to train future professionals capable of safeguarding the country's heritage. As a result of this collaboration, graduates of the Departments of Architecture and Archaeology of Phnom Penh's Royal University of Fine Arts have the opportunity to train in Japan, France, China, Indonesia, and the United States. The Ta Nei temple program offers five months of on-site training by an international staff, and the University offers similar field trips to Angkor. Training for tour guides is provided through the Ministry of Tourism.²⁰ APSARA also engages in community outreach programs: it has provided forums for villagers to exchange information and ideas on cultural heritage with community leaders, governmental authorities, and international research teams, worked with village leaders to promote preservation awareness, distributed educational brochures, and in one instance recruited a local theater troupe to create cultural heritage-themed educational presentations.²¹

The preservation organization Heritage Watch has also reached out to villagers, encouraging them to take an active role in protecting cultural property by establishing "community heritage patrols" and reporting illegal activity at archaeological sites.²² Villagers have been educated on the history of the temples and the significance of their cultural heritage; as a result, 50-70 villagers had been employed by APSARA as of 2009, indicating progress in closing the gap between governmental enforcement and the local efforts.²³ APSARA has also raised international awareness of looting by working with the publication of several documentaries and newspaper articles.²⁴

Cambodia has taken further steps to protect its by creating and maintaining art inventories. The National Museum has set up a tracking inventory with INTERPOL,

¹⁸ Brigitta Hauser-Schäublin, ed., *World Heritage: Angkor and Beyond* (2011); "Remarks by Ambassador Carol Rodley at the Launch of the Red List of Cambodian Antiquities at Risk," Embassy of the United States: Phnom Penh, Cambodia, Feb. 9, 2010, http://cambodia.usembassy.gov/sp_090210.html.

¹⁹ Sarom & Cheong, *supra* note 12.

²⁰ Training, APSARA, http://www.auriteapsara.org/en/apsara/about_apsara/training.html.

²¹ National Measures, APSARA, http://www.auriteapsara.org/en/apsara/about_apsara/police/looting/national.html.

²² "Preserving Cambodia's Heritage," *Guardian Weekly*, Feb. 23, 2009, <http://www.guardian.co.uk/world/2009/feb/23/cambodia-heritage> (interview with Bouth Rithy of Heritage Watch).

²³ *Id.*

²⁴ National Measures, *supra* note 21.

designed to document Angkor artifacts and prevent their sale in other countries.²⁵ With the help of the group Friends of Khmer Culture (FOKCI), the Museum has also pledged to inventory more than twenty-five undocumented provincial collections.²⁶ The latest project is entitled “One Hundred Missing Objects, Volume II,” an updated inventory of missing objects which originated in the Battambang and Vat Po Veal museums. This publication, undertaken by a group of researchers at the Museum, the EFEO (Ecole française d’Extrême Orient) and ICOM, will assist in identification and repatriation of artifacts found to have been smuggled out of the country.²⁷

At the international level, Cambodia has ratified every major agreement on the protection of cultural property in the past fifty years. These include the Hague Convention in 1962, the UNESCO Convention in 1972, the World Heritage Convention in 1991, the UNIDROIT Convention in 2002, and, most recently, the UNESCO Convention on the Protection of the Underwater Cultural Heritage in 2007. Not only is Cambodia a party to each of these treaties, but it became a party to each of them relatively quickly after enactment, even in times of war or political instability.²⁸ Cambodia has also entered into bilateral agreements, such as the Memorandum of Understanding with the United States currently up for review, and, as recently as January 2013, Cambodian officials signed a similar agreement with Ecuador.²⁹ In March 2011, Australia exemplified its “new cultural arrangement” with Cambodia through the ceremonial return of several Iron Age artifacts that had been illegally exported and put up for sale on eBay.³⁰ As discussed further below in LCCHP’s recommendation on the third determination, Cambodia has also worked to improve its relationship with Thailand in a joint effort to police cross-border smuggling.

Cambodia has also been vocal in the international dialogue on cultural patrimony, and was one of 30 countries to participate in the 2010 Cairo conference on the recovery of stolen antiquities.³¹ In 2009, the government’s efforts resulted in the repatriation of

²⁵ Gharbi, supra note 2.

²⁶ Provincial Museums Survey, National Museum of Cambodia, http://cambodiamuseum.info/en_projects_activities/provincial_museum.html

²⁷ One Hundred Missing Objects Volume II, UNESCO Office in Phnom Penh, <http://www.unesco.org/new/en/phnompenh/culture/museums/one-hundred-missing-object-volume-ii/>.

²⁸ Cambodia joined each treaty within eight years of its enactment, except for the World Heritage Convention of 1972; the nearly 20-year period before ratification reflects a time of deep political unrest. See Historical Overview of the Khmer Rouge, Cambodia Tribunal Monitor, <http://www.cambodiatribunal.org/history/khmer-rouge-history> (documenting Cambodia’s political turmoil under the Khmer Rouge regime).

²⁹ <http://www.opendevdevelopmentcambodia.net/news-source/the-cambodia-daily/ecuador-cambodia-sign-antiquities-agreement/>.

³⁰ http://www.minister.regional.gov.au/sc/releases/2011/march/sc031_2011.aspx.

³¹ Sam Rith, “Summit May See Return of Artefacts,” Phnom Penh Post, Jan. 8 2010.

works from the United States, Germany, and Thailand; however, repatriation can be a costly “uphill battle,” particularly if the objects were stolen before they were documented as originating in Cambodia.³²

Finally, APSARA has collaborated with UNESCO to protect and restore temples, establish new museums, and report looted works to the Art Loss Register, the world’s largest private database for the tracking of lost and stolen art.³³ Through these various means, Cambodia has demonstrated its ongoing determination to improve the safety of its cultural heritage in accordance with this statutory requirement.

III. The third determination looks at *the substantial benefit that U.S. import restrictions, either alone or in concert with actions taken by other market nations, would provide in deterring the serious situation of pillage*. Regarding the actions of other market nations, the Senate Report that accompanied enactment of the CPIA noted that identifying which countries have a “significant import trade” may be a function of “type and historic trading patterns,” as well as of the monetary value of the imports (Senate Report No. 97-564, 27). The CPIA emphasizes that, in order to be considered part of a “concerted international effort,” the measures employed by other nations need only be “similar,” as long as they function toward the same goal of restricting illicit trade. The CPIA also explicitly includes the actions of nations that are not party to the 1970 UNESCO Convention, further signaling that the third statutory determination does not require any specific type of import restrictions. This point is reiterated in the Senate Report: “the formula measuring the presence and worth of a ‘concerted international effort’ [need] not be so mechanical as to preclude the conclusion of agreements under Section 203(a) where the purposes of the legislation nevertheless would be served by doing so” (Senate Report No. 97-564, 28). There is, therefore, a significant degree of flexibility in the consideration of measures used by nations that serve the purpose of protecting cultural heritage.

Evidence that market countries are joining in a “concerted international effort” to address the pillage of archaeological sites throughout the world, including Cambodia, increased considerably in the time between the signing of the original Cambodia-U.S. bilateral agreement and its 2008 renewal, and this trend has continued over the past five years. There are now 123 State Parties to the UNESCO Convention, twenty-two of which have joined the Convention since the enactment of the initial bilateral agreement with Cambodia; seven of these have joined in the five years since the 2008 renewal.³⁴ This total includes some of the largest market nations, such as Switzerland, Denmark, Sweden, Germany; Belgium, noted for having a major market for Khmer art, has joined

³² Id.; Gharbi, supra note 2 (“Prosecution cases drag on for years, come with a hefty price tag, and offer meager results.”).

³³ International Measures, APSARA, http://www.autoriteapsara.org/en/apsara/about_apsara/police/looting/international.html. See also www.artloss.com.

³⁴ These include, in chronological order, Belgium, the Netherlands, Haiti, Equatorial Guinea, Kazakhstan, Palestine, and Swaziland.

the Convention in the past five years, as has the Netherlands. Two other large market nations, the United Kingdom and France, joined in 2002 and 1997, respectively.

Many nations see no need to enact implementing legislation for the UNESCO Convention to take effect within their territories. Other parties, such as Australia and Canada, have enacted general domestic implementing legislation creating sanctions for the import of illegally exported cultural materials from other State Parties.³⁵ These nations have therefore *already* implemented restrictions that are *similar* to, albeit much broader than, the import restrictions that have been imposed on objects from Cambodia by the United States pursuant to the CPIA.

The United Kingdom has responded to its obligations under the Convention by criminalizing the knowing “dealing in tainted cultural objects,” defined as objects whose “removal or excavation constitutes an offence.”³⁶ The offense of dealing in tainted cultural objects, which would include artifacts from Cambodia, includes the import or export of such objects.³⁷ Germany’s implementing legislation, which would also cover looted Cambodian materials, forbids the import of any illegally exported cultural objects that have been individually classified in an accessible inventory by the country of origin either one year prior to removal or within one year of the time when the country of origin gains knowledge of the excavation.³⁸

In 2002, Cambodia joined the 1995 UNIDROIT Convention, to which there are now thirty-three State Parties. The UNIDROIT Convention differs from UNESCO in its focus on requiring nations to create private rights of action for the recovery of stolen and illegally exported cultural objects. Article 3(2) identifies *all* illegally excavated archaeological objects as stolen property when consistent with the law in the country of origin.³⁹ By applying the domestic law of the exporting country to actions in the

³⁵ See, e.g., Canada Cultural Property Export and Import Act, R.S.C. 1985, c. C-51, § 37; Australia Protection of Movable Cultural Heritage Act 1986. These restrictions are much broader because they apply to *all* illegally exported cultural materials and are not restricted to archaeological materials that are older than 250 years or to specifically designated categories of archaeological and ethnological materials.

³⁶ Dealing in Cultural Objects (Offences) Act 2003, 2003 Ch. 27, Sections 1 and 2(2), available at <http://www.uk-legislation.hmso.gov.uk/acts/acts2003/20030027.htm>. The statute refers to objects removed from “a building or structure of historical, architectural or archaeological interest” or from an excavation either in the United Kingdom or in a foreign country. Section 2(3)(a).

³⁷ Section 4 of the Act gives British Customs the “necessary powers of enforcement where an offence involves the importation or exportation of a tainted cultural object.”

³⁸ Implementation Act of 18 April 2007, section 6(2), sentences 1-3. See also Matthias Weller, “Portable Antiquities: The German Legal System,” paper presented at conference, “Portable Antiquities in the Modern European Context: Law, Ethics, Policy and Practice” University of Pecs, Pecs, Hungary, July 12-13, 2007 (presentation on file with author).

³⁹ UNIDROIT Convention on Stolen or Illegally Exported Cultural Objects (1995), Art. 3(2) (“For the purposes of this Convention, a cultural object which has been unlawfully excavated or lawfully excavated but unlawfully retained shall be considered stolen, when consistent with the law of the State where the excavation took place.”).

destination country, the UNIDROIT Convention creates a potentially powerful deterrent to trading in archaeological materials in other State Parties, particularly when there is strong evidence that looting has occurred. For example, New Zealand, which joined the UNIDROIT Convention in late 2006 and the UNESCO Convention in 2007, enacted legislation that incorporates implementation of both conventions into domestic law, prohibiting the import into New Zealand of unlawfully exported protected foreign objects.⁴⁰ Although the United States has not ratified the UNIDROIT Convention, both the UNESCO and UNIDROIT Conventions have gained members in the past five years, demonstrating broadening international protection for objects illegally exported from Cambodia.

One of the ongoing challenges Cambodia faces is the failure of Thailand, in particular, to join the UNESCO Convention and to provide aid in policing the smuggling of Cambodian antiquities across their shared border. Thailand has, however, recently indicated its willingness to address cross-border smuggling; in April 2012, Cambodian and Thai officials from the border provinces signed an agreement pledging greater cooperation between the two countries.⁴¹ The agreement provided for the suppression of illegal activities along the border, including the illicit transport of antiquities.⁴² Objects are often seized by Thai police as they cross the border; they are then held in Thailand for identification and returned to Cambodia.⁴³ Last October, Thai police seized five Khmer statues that had been smuggled from Cambodia at the culmination of an investigation, demonstrating further cooperation between the two countries.⁴⁴ The continuing benefit that Cambodia receives from these cooperative actions with other market nations is therefore evident.

IV. The fourth determination looks to *whether import restrictions would promote the international exchange of cultural property for scientific, cultural, and educational purposes*. Cambodia has affirmed its interest in cultural exchange many times, starting in 1979 with the swift reopening of the National Museum in Phnom Penh after four years of abandonment under the Khmer Rouge Regime. The Museum has a long history of lending works for international exhibitions, and Australia, Japan, South Korea, France,

⁴⁰ Protected Objects Act 1975, as revised 2007, available at http://www.legislation.govt.nz/browse_vw.asp?content-set=pal_statutes. “Protected foreign object” includes all cultural objects as defined by Article 1 of the 1970 UNESCO Convention.

⁴¹ “Cambodian, Thai Interior Ministers Agree to Boost Co-op along Border,” CRI English.com, Apr. 27, 2012, <http://english.cri.cn/6966/2012/04/27/1461s696010.htm>.

⁴² *Id.*

⁴³ International Measures: Restitution, APSARA, http://www.auroriteapsara.org/en/apsara/about_apsara/police/looting/international.html.

⁴⁴ Chatchawal Sopapan, Police Seize Ancient Khmer Statues, The Nation (Bangkok), Oct. 5, 2012, <http://www.nationmultimedia.com/national/Police-seize-ancient-Khmer-statues-30191726.html>.

Germany, and the United States have all been beneficiaries of this policy.⁴⁵ In 2006, Cambodia sent 140 Khmer artifacts as part of a traveling exhibition, “Angkor—Sacred Heritage of Cambodia,” to the German cities of Bonn, Berlin, and Zurich.⁴⁶ In 2010, the National Museum loaned a collection of bronze Angkorian sculptures for the “Gods of Angkor” exhibit, which toured the United States for over a year, travelling from the Arthur M. Sackler Gallery in Washington, DC, to the J. Paul Getty Museum in Los Angeles, California and drawing thousands of visitors.⁴⁷ These endeavors demonstrate both Cambodia’s longstanding commitment to the worldwide sharing of its heritage and the importance of maintaining import restrictions in furtherance of this objective.

For these reasons, LCCHP submits that the four statutory criteria have been satisfied and asks that CPAC recommend extension of the bilateral agreement between the United States and Cambodia.

Respectfully submitted,



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⁴⁵ International Exhibitions, National Museum of Cambodia, http://cambodiamuseum.info/en_exhibition/international_exhibition/past.html.

⁴⁶ Id.

⁴⁷ Cheang Sophinarath, “‘Gods of Angkor’ Exhibit Bids America Goodbye,” *Voices of America: Khmer*, Aug. 17, 2011, <http://www.voacambodia.com/content/gods-of-angkor-exhibit-bids-america-goodbye-127955678/1359985.html>.

⁴⁸ The views stated in this letter represent those of LCCHP, and not Villanova University School of Law or Villanova University.