

THE LAWYERS'  
COMMITTEE FOR  
**CULTURAL**  
**HERITAGE**  
PRESERVATION

May 13, 2014

The Honorable Charles Rangel  
2354 Rayburn HOB  
Washington, DC 20515

The Honorable Steve Israel  
2457 Rayburn HOB  
Washington, DC 20515

VIA FAX

Dear Congressmen Rangel and Israel:

We write on behalf of the Lawyers' Committee for Cultural Heritage Preservation (LCCHP) to state our opposition to recent efforts by coin dealers to undermine the protection our laws give for ancient coins and to encourage you to refrain from introducing legislation exempting coins from these protections and safeguards against looting that are provided by the U.S. Convention on Cultural Property Implementation Act (CPIA), 19 U.S.C. § 2601 *et seq.*

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. We are lawyers, legal scholars, and law enforcement agents – as well as anthropologists, archaeologists, architects, art historians, students, and others –who champion preservation through the justice system. We are working to prepare a new generation of advocates, as well as educate the public.

Protection for ancient coins is deeply embedded in the CPIA and helps to carry out the purposes of the statute. The United States enacted the CPIA in 1983 to implement the *1970 UNESCO Convention on the Means of Prohibiting and Preventing the Illicit Import, Export and Transfer of Ownership of Cultural Property*. In enacting the CPIA, Congress recognized that nations around the world – particularly the U.S., a center of the worldwide trade in art and antiquities – have a shared interest in protecting cultural heritage and preventing the pillage of archaeological sites. For over 30 years, the CPIA has been a vital weapon in our nation's fight against the illegal antiquities trade. By fostering agreements with countries facing pillage of antiquities and by stopping illegally exported and undocumented objects recently looted in these countries from entering the U.S., the CPIA ensures that America will not become a haven for such looted objects.

Since there has been no public debate on the coin dealers' legislative initiative, LCCHP recently learned about their effort to exempt their trade in ancient coins from the

CPIA's protections against the import of looted and smuggled objects. Such an exemption is neither needed by the coin trade nor warranted by CPIA's provisions, and would cause irreparable harm to international relations.

Even coin collectors admit that coins can have cultural significance - indeed, that is why dealers and collectors prize them. Coins are invaluable to interpreting the archaeological record because they can provide detailed information about ancient trade, economy, politics, settlements, movement of peoples, topography, religion, and other topics.

Stifling the illicit trade in ancient coins is important to numerous countries, as evidenced by recent requests for the addition of such protection to MOUs - Cyprus, Italy, Greece, and China. Exempting ancient coins would interfere with U.S. cultural diplomacy efforts with these and other countries, put our international relations at risk, contradict current bilateral agreements, and breach the obligations the U.S. undertook when it ratified the 1970 UNESCO Convention.

LCCHP urges you to reject the coin dealers' efforts to exempt themselves from a long-standing and effective tool that has stood as a bulwark against looting and theft for more than 30 years. We have enclosed further information on the CPIA and coins, and would be pleased to answer any questions.

Thank you.

Respectfully,

*Elizabeth C. Varner*

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Enclosures (2)