



September 11, 2020
Submitted via Regulations.gov portal

Mr. Stefan Passantino
Chair of the U.S. Cultural Property Advisory Committee
Cultural Heritage Center (ECA/P/C)
U.S. Department of State
2200 C Street, NW
Washington, DC 20037

Dear Mr. Passantino and Cultural Property Advisory Committee Members:

On behalf of the Ancient Coin Collectors Guild, this responds to object to the proposed extension, and apparent expansion, of the MOU and associated import restrictions with the Government of Greece, as it impacts ancient coins, that is being considered by U.S. Cultural Property Advisory Committee in a public notice described at 85 Federal Register 51544 (August 20, 2020). If the MOU is renewed, we ask you to advise the decision maker, Assistant Secretary Royce, to delist coins, or, failing that, to not expand the designated list further. We also ask CPAC to advocate that any import restrictions be made subject to European Union export controls binding on Greece, such that coins on the current Greek designated list legally exported from sister E.U. countries are allowed entry into the United States.

The Ancient Coin Collectors Guild is a nonprofit organization, whose mission is to promote and nurture the free and independent collecting of coins from antiquity through education, political action and consumer protection. It has 22 affiliate member organizations and advocates for the interests of thousands of ancient coin collectors and hundreds of small businesses of the numismatic trade. Our website may be found at <https://ancientcoincollectorsguild.wildapricot.org/> (visited August 30, 2020).

As you know, after an earlier MOU between the United States and Greece was signed, a final rule import restriction was adopted, at 76 Federal Register at 74693 (December 1, 2011), which detailed at Subsections 7a-c three categories of restricted ancient coins. Specifically, Subsection 7a restricted "Greek Bronze Coins—Struck by the city-states, leagues, and kingdoms that operated in territory of the modern Greek state ... [between the a]pproximate date: 5th century B.C. to late 1st century B.C." Subsection 7b restricted "Greek Silver Coins—This category includes the small denomination coins of the city-states of Aegina, Athens, and Corinth, and the Kingdom of Macedonia under Philip II and Alexander the Great ... all denominations of coins struck by the other city-states, leagues, and kingdoms that operated in the territory of the modern Greek state ... [between the a]pproximate date: 6th century B.C. to late 1st century B.C."

Subsection 7c restricted “Roman Coins Struck in Greece—In silver and bronze, struck at Roman and Roman provincial mints that operated in the territory of the modern Greek state ... [between the a]pproximate date: late 2nd century B.C. to 3rd century A.D.”

In response to the earlier proposed MOU between the United States and Greece, the ACCG’s then-Executive Director Wayne G. Sayles wrote to object to the CPAC on September 20, 2010, noting that ancient coins are rarely significant cultural objects, that the effective preservation of cultural resources requires a cooperative approach, that the private ownership of ancient coins is not only consistent with the interests of society, and that import restrictions would have no effect on the world market except to exclude our citizens from it.

The ACCG objects to the proposed renewal as it applies to coins, and/or any possible expansion, of the MOU between the United States and Greece to coin types that are not currently restricted:

I. The 2020 Public Notice states that the proposed extension of the MOU with Greece “Concerning the Imposition of Import Restrictions on Categories of Archaeological and Byzantine Ecclesiastical Ethnological Material Though the 15th Century A.D. of the Hellenic Republic.” However, the 2020 Public Notice fails to detail whether and how the scope of current MOU’s Designated List would be expanded to include ancient coins as part of the “Categories of Archaeological and Byzantine Ecclesiastical Ethnological Material Though the 15th Century A.D. of the Hellenic Republic.” Indeed, the current Designated List found at 76 Federal Register at 74693 (December 1, 2011), is expressly limited at Subcategory 7a-c to three detailed subcategories of subsection 7a “Greek Bronze Coins ... [between the a]pproximate date: 5th century B.C. to late 1st century B.C.,” subsection 7b of “Greek Silver Coins ... [between the a]pproximate date: 6th century B.C. to late 1st century B.C.,” and subsection 7c “Roman Coins Struck in Greece ... [between the a]pproximate date: late 2nd century B.C. to 3rd century A.D.”¹

By its terms, the 2011 Designated List did NOT include “Greek-minted” coins struck after the 3rd century A.D. within modern-day Greece or “Roman Coins Struck in Greece” after the 3rd century A.D. within modern-day Greece. As such, the current designated list does not include coins struck at the Roman Imperial Mint at Thessalonica, which operated from 298 or 299 A.D. to c. 460 A.D. Nor does the current import restrictions include widely circulating types like the Athenian Tetradrachm. If the 2020 proposed “extension” of the MOU intends to expand the Designated List to include such widely circulating types or coins after the 3rd century A.D., however, then the U.S. Cultural Property Advisory Committee is legally required to reissue a revised public notice, so to properly inform the public of an expanded proposed Designated List, so to afford the public with advance notice to allow for meaningful comments.

A revised public notice would be required because the Administrative Procedure Act requires an agency’s notice must “provide sufficient factual detail and rationale for the rule to permit

¹ Presumably, the intent of this restriction is to include Roman provincial coins struck in Greece as the only Roman Imperial mint to operate in Greece, Thessalonica, was not active until later. Coins struck at this mint, aside from a mint-mark, were identical to other coins from other late Roman mints also struck to circulate throughout the Roman Empire. We are also aware of some earlier issues from the mint at Corcyra (Corfu) of Greek not Roman types, which are sometimes characterized as Roman due to Roman control of the city. See P. Gardner, *British Museum Catalogue of Greek Coins, Thessaly to Aetolia* (1883) available at <http://snible.org/coins/hn/corcyra.html> (last visited September 3, 2020).

interested parties to comment meaningfully." *Fla. Power & Light Co. v. United States*, 846 F.2d 765, 771 (D.C. Cir.1988). Moreover, any proposed departure that extends the import restrictions of ancient coins must be fully explained. The failure of an agency to comply with the procedural requirement to provide a reasoned explanation for its action is "arbitrary and capricious" under the Administrative Procedure Act. *Dept. of Homeland Security v. Regents of the University of California*, No. 18-857, 591 U.S. ____ (U.S. June 18, 2020).

II. In any event, we question why it is necessary to extend import restrictions on coins. Continued restrictions will negatively impact hobbyists who collect Greek-minted coins for its history and culture.² It will also negatively impact the cultural understanding such coinage provides as well as diminish the people-to-people contacts that collecting provides. As we will detail, it is well known that that it is typically impossible to assume a particular coin (especially Greek ones) was "first discovered within" and "subject to the export control" of Greece. Indeed, huge numbers of "Greek" coins struck within modern-day Greece and "Roman Coins Struck in Greece" were circulated and hoarded outside modern-day Greece, and are nowadays found widely and legally available for sale elsewhere and even within Greece itself.

To the extent that the proposed MOU intends to restrict ancient coins minted within modern-day Greece, scholarly evidence demonstrates that such coins have numbered in the millions, and have circulated and have been typically found, outside the confines of modern-day Greece. In Peter Tompa's written testimony to the CPAC dated October 12, 2010, he submitted the academic study entitled "Greek Coin Finds Beyond the Borders of the Hellenic Republic," that was commissioned by the International Association of Professional Numismatists. We are including this study as Exhibit A as part of our letter, which we will refer to in our comments as the "2010 Finds Study."

Indeed, the silver "owl" coinage of Athens – probably the most famous of all ancient Greek coins -- is an example of Greek coinage minted in huge numbers which was circulated, and hoarded, widely outside modern-day Greece, and which nowadays are found widely and legally available for sale elsewhere and even within Greece itself.

The trickle of silver coinage produced by the Athenians in the sixth century became by the end of the fifth a colossal flood, which was fed both by their indigenous "fountain of silver" (Aesch. Per. 238), the mines at Laurion, and the flow of harbor revenues and imperial tribute. The deluge of Athenian silver effectively inundated economies in the Aegean and parts of the Near East, where the Athenian' primary coin type, the large denomination tetradrachm sporting their patron deity, Athena, on the obverse and her owl on the reverse, became one of the most influential, long-lasting, and widespread coinages in the ancient world. In one form or another, the

² The coin is "a mirror of the ancient world, which indicates the progress of the arts, which accompanies human society in all its aspects, civic life, laws, institutions, wars, conquests, peace treaties, changes of government, trade, and alliances. It perpetuates the fame of noble generations and keeps alive the memory of great men [as well as great women]." Elvira Eliza Clain-Stefanelli, *Numismatics - An Ancient Science A Survey of its History* at 3 (U.S. Government Printing Office, 1968) quoting Ernest Charles Babelon, *Traité des monnaies grecques et romaines: Théorie et doctrine*, Volume 1, col 66 (Paris, 1901).

“owl” coinage was minted virtually without interruption from around 515 B.C. until the Athenians at last gave up their silver civic coinage in the first century B.C. No other Greek polis could claim such extreme monetary endurance. The owls, and their contemporary imitations, are found in hoards far from Attica and the Aegean, from Yemen in the south to Afghanistan in the east....

Peter G. Van Alfen, (2012) ‘The Coinage of Athens, Sixth to First Century B.C.’ in William E. Metcalf (ed.), The Oxford Handbook of Greek and Roman Coinage, (New York, Oxford University Press), p. 88.

As detailed on page 2 of the 2010 Finds Study, of the estimated 350,000,000 coins struck in the ancient Greek world (encompassing Greece proper, the Near East, and the Mediterranean basin), “coins struck in Greece but found elsewhere account for at least 18% of all the coins of the Greek world ever produced.” The 2010 Finds Study also demonstrates “that ancient coins produced in Greece circulated in quantity throughout the Mediterranean world and far to the east.” Based on data from the M. Thompson, O. Mørholm, and C. Krarry, An Inventory of Greek Coin Hoards (New York, 1973), the 2010 Finds Study’s Table 1 identifies 19,355 Greek coins minted in modern-day Greece but found in coin hoards located in 24 other countries.³

As a further illustration, the following are examples of coins from four ancient mints in Greece, but are found in coin hoards located in 12 other countries, as detailed in ten subsequent Royal Numismatic Society coin hoard publications. Specifically, coins minted in Corinth have been found in coin hoards in Aryut, Egypt CH-II 17;⁴ Calabria, Italy CH-II 63 and 64; Mit Rahineh, Egypt CH-III 4-7;⁵ Palermo, Sicily CH-IV 19;⁶ Catania, Sicily CH-V 6;⁷ Sicily CH-V 23; Gela, Sicily CH-V 28; Sicily CH-VII 56 and 57;⁸ Croton, Italy CH-VIII⁹ 226 and 264; South Italy CH-VIII 232; Sicily CH-VIII 296; Kerki, Turkmenistan CH-X 206;¹⁰ Calabria, Italy CH-X 394-396; Sicily CH-X 400; Sicily CH-X 407-409, 411-412. Coins minted in Histiaeae have been found in coin hoards in Grad Delcevo, Republic of North Macedonia CH-VIII 418; Sapareva Bania, Bulgaria CH-IX 223;¹¹ Garbino, Bulgaria CH-X 116; Bosilegrad, Serbia CH-X 127. Coins minted in Pella have been found in coin hoards in Kuft, Egypt CH-II 55; Botevsrad, Bulgaria CH-VIII 136; Sofia, Bulgaria CH-VIII 170; Dulovo, Bulgaria CH-X 73; Cepigova, Republic of

³ If the 2020 Notice seeks to restrict “Greek-minted” Roman coins after the 3rd century A.D., then it cannot include most Byzantine coins through the 15th Century A.D. “With the exception of coins struck at the branch mints of Thessalonica (operational 498 – 630 and 1081-end of the fourteenth century), Arta (operational 1204-1271), and perhaps Corinth in the period 1143-1195, no Byzantine imperial coins were struck within the borders of modern Greece. The primary Byzantine mint supplying coins for Greece was in fact Constantinople, but if the mint location is the basis for determining right of ownership, the Constantinopolitan issues found in Greece must actually belong to Turkey.” 2010 Finds Study at p. 19.

⁴ M. Jessop Price (ed.)(Greek Hoards), Coin Hoards, Volume II (London, 1976).

⁵ M. Jessop Price (ed.)(Greek Hoards), Coin Hoards, Volume III (London, 1977).

⁶ M. Jessop Price (ed.)(Greek Hoards) Coin Hoards, Volume IV (London, 1978).

⁷ M. Jessop Price (ed.)(Greek Hoards) Coin Hoards, Volume V (London, 1980).

⁸ M. Jessop Price (ed.)(Greek Hoards), Coin Hoards, Volume VII (London, 1985).

⁹ U. Wartenberg, M. Jessop Price, K.A. McGregor (eds.), Coin Hoards Volume VIII (London, 1994).

¹⁰ Oliver Hoover, Andrew Meadows, Ute Wartenberg (eds.), Coin Hoards Volume X (New York, 2010).

¹¹ Andrew Meadows, Ute Wartenberg, (eds.), Coin Hoards Volume IX (London, 2002).

North Macedonia CH-X 114; Lieshan, Albania CH-X 171; Kotcherinovo, Bulgaria CH-X 187; Akcakale, Turkey CH-X 251; Quetta, Pakistan CH-X 275; Demanhur, Egypt CH-X 446.

Coins minted in Athens have been found in coin hoards in Egypt, CH-I 7;¹² Cilicia, Turkey CH-I 87A; Asyut, Egypt CH-II 17; Turkey CH-II 40; Cilicia, Turkey CH-V 14; Homs, Syria CH-VI 4;¹³ Latakia, Syria CH-VI 5; Sicily CH-VI 21; Vetrea, Bulgaria CH-VII 141; Tripoli, Lebanon CH-VIII 81; Rouad, Syria CH-VIII 123; Egypt CH-VIII 125 and 151; Sicily CH-VIII 296; Hija e Korbit, Albania CH-VIII 299; Candarh, Turkey CH-VIII 505; Naxos, Sicily CH-VIII 584; Furka, Republic of North Macedonia CH-IX 146; Krcedin, Serbia CH-IX 166; Raslog, Bulgaria CH-IX 258; Kjustendil, Bulgaria CH-IX 278; Boijarino, Bulgaria CH-IX 325; Nagidos, Turkey CH-IX 390; Nablus, Palestine Territory CH-IX 441; As-Surayrah, Saudi Arabia CH-IX 514; Ordu, Turkey CH-IX 530; Calabria, Italy CH-X 389.

III. We believe that extending import restrictions of “Greek-minted” coins through the 3rd century A.D. under the earlier MOU, and its possible expansion to include “Greek-minted” coins through the 15th century A.D., runs afoul of at least four statutory provisions of the CPIA and should be denied:

A. To begin with, the governing statutory provision at 19 U.S.C. § 2601(2)(C)(i)(I) of the CPIA require any restriction be placed only on artifacts of “cultural significance.” During the legislative debate preceding passage of CPIA, the U.S. State Department representative, Mr. Mark Feldman, made it clear that coins were not considered objects of concern under the proposed Act. Responding to a question posed by Congressman Vanik, Mr. Feldman said:

“In most cases, it is impossible to establish the provenance of a particular coin or hoard of coins. Therefore, there would be no reason for the United States, in most cases, to list coins as one of the categories of objects of archaeological or ethnological interest that would be included in the agreement.”

“Cultural Property Treaty Legislation,” Hearing before the House Subcommittee on Trade of the Committee on Ways and Means, 96th Cong., 1st session on HR 3403. P. 8.

Moreover, coins are the first truly “massed-produced” objects in the ancient world, created by striking etched obverse and reverse dies onto hot blank metal disks. Yet the individual ancient coin is essentially a duplicate minted from coin dies, which are produced in the thousands, and do not meet the “cultural significance” requirement. There is “a lot of debate as to whether or not nations and scholars should consider coins as culturally significant.... Coinage, in a general sense, provides evidence to historians about the monetary systems of ancient civilizations, various historical events, information about the art styles of ancient civilizations, and more. Individual coins, however, are ‘by their very nature duplicates.’ Nothing new about a culture can be learned from a duplicate coin if a single, viable copy of that coin has been studied.” Cody Wisniewski, *The Currency of History: The Possible, and Improper, Restriction on Ancient Egyptian Coinage*, 17 San Diego Int’l L.J. 329, 346 (2016)(footnotes omitted and emphasis added).

¹² M. Jessop Price (ed.)(Greek Hoards), Coin Hoards, Volume I (London, 1975).

¹³ M. Jessop Price (ed.)(Greek Hoards), Coin Hoards, Volume VI (London, 1981).

B. The governing statutory provision at 19 U.S.C. § 2601(2)(C) of the CPIA also require that any restriction be applied on artifacts be that it is “first discovered within” in the affected country. *Ancient Coin Collectors Guild v. U.S. Customs and Border Protection*, 801 F. Supp. 2d 383, 407 n. 25 (D. Md. 2011)(“Congress only authorized the imposition of import restrictions on objects that were ‘first discovered within, and [are] subject to the export control by the State Party.’”).

As detailed above, however, scholarly evidence demonstrates that “Greek-minted” coins were widely circulated and hoarded, and are typically found, outside the confines of modern-day Greece. Indeed, over the course of thousands of years of human history modern-day Greece had been parts of a larger Kingdom of Macedonia, the Roman Republic, the Roman Empire, the Byzantine Empire all of which minted coins in many locations. No one can assume all such “Greek-minted coins” -- or even a substantial percentage of them -- were “first discovered within” modern-day Greece.

C. The governing statutory provision at 19 U.S.C. § 2602(a)(1)(C)(2) of the CPIA also require that before any restriction can occur that “remedies less drastic than the application of the restrictions set forth ... are not available.” Yet Greece has not adopted the “less drastic” system that exists such as with the United Kingdom’s Treasure Act and Portable Antiquities Scheme. As an alternative to import restrictions, the CPAC should facilitate lawful trade by acknowledging and honoring European Union member countries, who allow the export of archaeological and ethnological objects with or without a license according to the local law of the exporting EU member.

1. Fully detailed at www.finds.org.uk, the United Kingdom’s system¹⁴ is well regarded, effective, and is clearly “less drastic” than Italy’s system. The United Kingdom’s system promotes the maximum public interest and benefit from the recovery, recording and research of portable antiquities; promotes best practice by finders/landowners and archaeologists/museums in the discovery, recording and conservation of finds made by the public; in partnership with museums and others, raises awareness among the public; creates partnerships between finders and museums/archaeologists to increase participation in archaeology and advance our

¹⁴ The British Museum’s 8-page Portable Antiquities & Treasure Strategy: 2020, at <https://finds.org.uk/documents/file/PAS-strategy-2019.pdf> (visited June 27, 2020), lists many of the key accomplishments of the United Kingdom’s Portable Antiquities Scheme. This includes that it “has recorded over 1 million archaeological finds discovered by the public on its online database, helping to identify new archaeological sites and help rewrite our understanding of the past[; that o]ver 10,530 Treasure finds have been reported via the PAS, of which 37% have been acquired by 215 museums across England and Wales for public benefit[; that] PAS data is important to archaeological research, and has been used in at least 455 research projects, including 20 pieces of large-scale research and 95 PhDs[; the t]he Code of Practice for Responsible Metal Detecting in England and Wales provides the baseline for best practice for those searching for archaeology[; and that t]he PAS provides a model for other finds recording systems, such as those being established in Flanders, Denmark, the Netherlands and Finland.”

understanding of the past; and increase opportunities for museums to acquire archaeological finds for public benefit.

2. As a less drastic alternative to import restrictions, the CPAC should facilitate lawful trade by acknowledging and honoring European Union member countries, who allow the export of archaeological and ethnological objects with or without a license according to the local law of the exporting EU member. Honoring EU exports certainly qualify as a “less drastic” remedy other “than the application of the restrictions.” Allowing entry of objects legally exported from the EU that are found on “designated lists” for EU member countries like Bulgaria, Cyprus, Greece and Italy would greatly facilitate lawful trade in a situation that could not have been specifically contemplated by the CPIA, which predates the EU’s export control regime. This can be simply accommodated by modifying any MOU to make any import restrictions inapplicable to ancient coins legally exported from another EU country, with or without a formal export permit under local law.

D. According to the Bureau of Educational and Cultural Affairs, found at <https://eca.state.gov/cultural-heritage-center/cultural-property-advisory-committee/foreign-government-requests>, a Foreign Government’s request for cultural property protection must “include a statement of facts that addresses the matters on which the Department makes the determinations specified in the CPIA, 19 U.S.C. § 2602(a)(1).” These determinations must include... “4. *Credible enforcement efforts*, including monitoring for compliance and appropriate sanctions, documentary evidence of which should include data of sufficient duration and scope to provide the information necessary for a reliable determination. ”

1. The 2020 public notice does not document – much less even allege -- that Greece has engaged in “credible enforcement efforts.” Indeed, the 2011 MOU between the United States and Greece essentially recognized that Greece lacked “credible enforcement efforts,” insofar as Article II, Section 2 of the 2011 MOU states that “The Government of the Hellenic Republic shall consider increasing the capacity of the existing units within the Hellenic Police to monitor and protect cultural heritage sites throughout the country, and shall also consider improving the existing regulations on the use of metal detectors.” Yet there is no evidence that since 2011 Greece has either increased the capacity of the Hellenic Police to monitor and protect cultural heritage sites or improved existing regulations regarding metal detectors.

2. The 2020 public notice does not document – much less even allege -- that Greece has provided to the U.S. Cultural Property Advisory Committee the required “data of sufficient duration and scope to provide the information necessary for a reliable determination.”

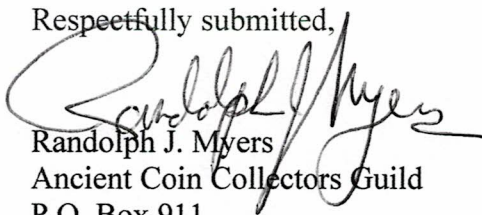
IV. Conclusion

The Ancient Coin Collectors Guild urges the U.S. Cultural Property Advisory Committee to vote to discontinue any import restrictions on coins. If the 2020 proposed “extension” of the MOU also intends to expand the Designated List, however, then the U.S. Cultural Property Advisory Committee is legally required to reissue a revised Public Notice, insofar as the phrase “Concerning the Imposition of Import Restrictions on Categories of Archaeological and Byzantine Ecclesiastical Ethnological Material Though the 15th Century A.D. of the Hellenic Republic” is impermissibly vague and fails to inform the public of the scope of proposed expanded import restrictions. Indeed, it is unclear to the extent the 2020 proposed extension of

the MOU would include Greek coins after the 3rd century A.D., thereby failing to afford the public with advance notice to allow meaningful participation and to submit comments.

The issues regarding ancient coins are very important to the large numbers of collectors like our members of the **Ancient Coin Collectors Guild**, who collect coins out of love of history and as an expression of our own cultural identity. And while the American Numismatic Association at www.money.org/consumer-awareness/ancient-coin-import-restrictions, “fully supports the idea of protecting cultural property,” it has “consistently argued that ancient coins should not be included in MOUs for a number of reasons. First, coins are among the most common and durable of artifacts (with a few notable exceptions), and therefore the information they contain is in no danger of being lost to historians or archaeologists in the way unique or rare objects would be if not preserved in cultural institutions. Additionally, there is no shortage of coins in museums in nations that have ancient specimens as part of their history, particularly Europe, the Middle East and China. Finally, coins are excellent teaching tools. Their durability – and the large number of specimens available – make them ideal collectors’ items. They encourage interest in the past, which in turn promotes educational programs in museums and universities, many of whose collections were formed or financed by hobbyists.”

Respectfully submitted,



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Attachment: Exhibit A “Greek Coin Finds Beyond the Borders of the Hellenic Republic” (2010)

EXHIBIT A

Greek Coin Finds Beyond the Borders of the Hellenic Republic

Greek Coins of the Archaic, Classical, and Hellenistic Periods

Hoardings of Greek coins of the archaic, classical, and Hellenistic periods found beyond the borders of the modern Hellenic Republic are listed in Table 1. The table summarizes the published information on 19,355 individual pieces found in hoards from 24 different modern sovereign states in Europe, the Middle East, Central Asia, and North Africa:

1. Afghanistan
2. Albania
3. Algeria
4. Azerbaijan
5. Bulgaria
6. Croatia
7. Cyprus
8. Egypt
9. France
10. Iran
11. Iraq
12. Israel
13. Italy
14. Jordan
15. Lebanon
16. Macedonia
17. Moldova
18. Montenegro
19. Romania
20. Serbia
21. Spain
22. Syria
23. Turkey
24. Ukraine

The data is drawn only from the *Inventory of Greek Coin Hoards*, which ends its coverage in 1973.¹ The short time in which to prepare this report made it impossible to include the material published in the ten volumes of *Coin Hoards* published between 1975 and 2010. The table does not take into account hoard material published after 1973, private finds, or find records from archaeological sites. Coins without an explicit mint origin within the borders of modern Greece have been excluded, meaning that many Alexander the Great issues without recorded mint attributions could have been struck at Greek mints. Bearing these limitations in mind, the numbers are certainly higher

¹ M. Thompson, O. Mørkholm, and C. Kraay, *An Inventory of Greek Coin Hoards* (New York, 1973).

(probably substantially higher) than those presented here. The remelting and overstriking of Greek coins exported in antiquity beyond the borders of the modern Hellenic Republic (i.e. Corinthian coins in Italy and Sicily, etc.) also supports the position that the number of Greek coins circulating outside of what is now modern Greece was extremely large.²

Indeed, the total number of coins struck in the ancient Greek world (encompassing Greece proper, the Near East, and the Mediterranean basin) has been statistically estimated at 350,000,000 pieces.³ This figure is considered to fall at the low end of the spectrum, considering the limitations of the database of published museum collections upon which the study was based. This large number shows not only that the coins sought by the Hellenic Republic can hardly be considered rare, but that a very large number of those coins actually struck in Greece are found beyond its borders. Using the total in Table 1 and the estimated total for all coins of the Greek world, coins struck in Greece but found elsewhere account for at least 18% of all coins of the Greek world ever produced.

From the data in Table 1 it should be abundantly clear that ancient coins produced in Greece circulated in quantity throughout the Mediterranean world and far to the east. Ancient Greek coins therefore cannot be characterized justly as purely local coins of Greece, lacking significance for the numerous modern states in which they are found. They actually represent a facet of the shared international economic and political history of the ancient Mediterranean and Near East as a whole. This fact is underlined by the extended influence of Greek coins into regions in which they did not circulate, such as the territory of modern Yemen. Here the local rulers of Qataban and Saba' regularly copied the types of Athens for their own coins, yet no finds of Athenian coins have yet been recorded in Yemen.⁴ The find evidence should negate any claim of sole cultural rights over Greek coins found beyond the borders of the modern Hellenic Republic.

It is also worth pointing out that determining the "Greekness" of some coins will almost certainly be a matter of international contention, since ancient borders do not necessarily conform to those of modern states. Thus, certain coins attributed to Thraco-Macedonian tribes might have originated in what is now the Hellenic Republic, but since the territory of these peoples also included parts of the modern Republics of Macedonia and Bulgaria, it is completely inappropriate for Greece to claim sole cultural rights to these coins. Likewise, Greek rights to coins attributed to ancient Epeiros could be disputed since this region is now divided between the Hellenic Republic and the Republic of Albania. A problem is also posed by the coins struck by no less a Greek icon than Alexander the Great. His coins were struck by imperial mints located both within the borders of what is now modern Greece as well as in Bulgaria, Turkey, Syria, Lebanon, Egypt, and Iraq. The imperial character of this coinage and its international production makes it impossible to

² D. MacDonald, *Overstruck Greek Coins* (Atlanta, 2009), pp. 22-30, 32-36, 40,

³ F. De Callatay, "Les taux de survie des émissions monétaires antiques, médiévales et modernes. Essai de mise en perspective et conséquences quant à la productivité des coins dans l'antiquité," *Revue Numismatique* 155 (2000), pp. 87-109.

⁴ S. Munro-Hay, *Coinage of Arabia Felix* (Milan, 2003), pp. 109-123, 132-141.

make any legitimate claim that they belong only to Greece. If such a case were advanced, Iraq should be encouraged to make a counter claim, since Alexander's imperial capital was actually located in Babylon (Iraq), not in Greece.

The broad international and at times imperial character of the famous Athenian owl tetradrachm also makes it difficult to consider it a coin with cultural relevance to the Hellenic Republic alone. As can be seen from Table 1, these coins circulated widely, especially in the Near East, where they were frequently imitated. Their eastern movement and imitation partly stems from the preference of foreign mercenaries to be paid in this trusted coin. Major Athenian imitative series are known in Egypt, Philistia and Yehud (Israel), Babylon (Iraq), and Bactria (Afghanistan) during the Persian and early Hellenistic periods. Athenian coins even occur as seals on Aramaic documents of the Persian Empire.⁵

Even if Greece is only pressing for restrictions on coins found within the borders of the modern state, it should be clear that the vast number of potential find countries for ancient Greek coins would make it nearly impossible for U.S. customs agents to come to any reasonable conclusion as to the source country.

Table 1: Greek Coin Finds from Outside of the Hellenic Republic

Issuer	Coins	Find Country	Findspot	Reference
Abdera	5	Bulgaria	Karzali	IGCH 694
	217	Turkey	Comotini	IGCH 868
	1	Turkey	Asia Minor	IGCH 1177
	1	Turkey	Asia Minor	IGCH 1182
	1	Syria	Ras Shamra	IGCH 1478
	7	Egypt	Demanhur	IGCH 1637
	3	Egypt	Sakha	IGCH 1639
	2	Egypt	Benha el Asl	IGCH 1640
	12	Egypt	Asyut	IGCH 1644
	1	Iran	Persepolis	IGCH 1789
Aesillas the Quaestor	100	Bulgaria	Cepeni	IGCH 646
	1	Bulgaria	Zlatograd	IGCH 969
	15	Bulgaria	Kamenica	IGCH 970
Aigai	1	Jordan	Jordan	IGCH 1482
	3	Egypt	Asyut	IGCH 1644
Aineia	1	Egypt	Egypt	IGCH 1634
	1	Egypt	Fayum	IGCH 1635
	1	Egypt	Asyut	IGCH 1644
Aigina	10	Turkey	Asia Minor	IGCH 1177

⁵ M.C. Root, "Evidence from Persepolis for the Dating of Persian and Archaic Greek coinage," *Numismatic Chronicle* 148 (1988), p. 1ff; C.G. Starr, "A Sixth-Century Athenian tetradrachm used to seal a clay tablet from Persepolis," *Numismatic Chronicle* 16 (1976) 219ff.

		2	Turkey	Asia Minor	IGCH 1182
		2	Turkey	Asia Minor	IGCH 1252
		2	Jordan	Jordan	IGCH 1482
		11	Lebanon	Massyaf	IGCH 1483
		1	Egypt	Mit Rahineh	IGCH 1636
		16	Egypt	Demanhur	IGCH 1637
		3	Egypt	Sakha	IGCH 1639
		4	Egypt	Benha el Asl	IGCH 1640
		74	Egypt	Asyut	IGCH 1644
		9	Egypt	Zagazig	IGCH 1645
		3	Egypt	Fayum	IGCH 1646
		1	Egypt	Naukratis	IGCH 1647
		3	Egypt	Delta	IGCH 1650
		1	Egypt	Naukratis	IGCH 1652
		1	Iraq	Mesopotamia	IGCH 1747
		1	Iran	Persepolis	IGCH 1789
		45	Iran	Malayer	IGCH 1790
		1	Afghanistan	Balkh	IGCH 1820
		4	Afghanistan	Cabul	IGCH 1830
		15	Italy	Taranto	IGCH 1874
		1	France	Auriol	IGCH 2352
		4	Syria	Djeble	IGCH 1479
		3	Jordan	Jordan	IGCH 1482
		1	Lebanon	Massyaf	IGCH 1483
		1	Egypt	Sakha	IGCH 1639
		3	Egypt	Benha el Asl	IGCH 1640
		38	Egypt	Asyut	IGCH 1644
		5	Egypt	Zagazig	IGCH 1645
		1	Egypt	Fayum	IGCH 1646
		2	Egypt	Naukratis	IGCH 1652
		8	Iran	Malayer	IGCH 1790
		3	Afghanistan	Balkh	IGCH 1822
		3	Afghanistan	Oxus River	IGCH 1820
		2	Afghanistan	Cabul	IGCH 1830
		5	Italy	Taranto	IGCH 1874
		55	Italy	Mesagne	IGCH 1971
		4	Italy	Vito Superiore	IGCH 1910
		8	Italy	Salve	IGCH 2030
		1	Turkey	Asia Minor	IGCH 1165
		5	Serbia	Djoran	IGCH 555
		2	Italy	Soverato	IGCH 1969
		1	Italy	Surbo	IGCH 2003
		13	Italy	Salve	IGCH 2030
		11	Bulgaria	Pleven	IGCH 423
		20	Macedonia	Prilipek	IGCH 448
		15	Bulgaria	Slana bara	IGCH 454
		1	Serbia	Zemun	IGCH 458
		4	Albania	Bakerr	IGCH 559
		1	Bulgaria	Krusevo	IGCH 695
Akanthos					
Akarnania					
Ambracia					
Anactorium					
Andros					
Amphipolis					
Argos					
Athens					

IGCH 1282	Asia Minor	Turkey	32	Bulgaria	Nevrokop	IGCH 829
IGCH 1283	Asia Minor	Turkey	1	Bulgaria	Benovski	IGCH 918
IGCH 1284	Jordan	Jordan	4	Bulgaria	Strojno	IGCH 926
IGCH 1285	Macedonia	Macedonia	282	Bulgaria	Cernogorovo	IGCH 949
IGCH 1286	Benha el Asl	Egypt	16	Bulgaria	Dragomir	IGCH 951
IGCH 1287	Benha el Asl	Egypt	5	Bulgaria	Izvorite	IGCH 952
IGCH 1288	Benha el Asl	Egypt	2	Bulgaria	Nova Zagora	IGCH 963
IGCH 1289	Benha el Asl	Egypt	2	Bulgaria	Boljarino	IGCH 975
IGCH 1290	Benha el Asl	Egypt	27	Bulgaria	Belica	IGCH 976
IGCH 1291	Benha el Asl	Egypt	3	Bulgaria	Nova Maxala	IGCH 977
IGCH 1292	Benha el Asl	Egypt	3	Bulgaria	Karavelovo	IGCH 978
IGCH 1293	Benha el Asl	Egypt	19	Turkey	Asia Minor	IGCH 1177
IGCH 1294	Benha el Asl	Egypt	4	Turkey	Asia Minor	IGCH 1165
IGCH 1295	Benha el Asl	Egypt	5	Turkey	Vourla	IGCH 1210
IGCH 1296	Benha el Asl	Egypt	28	Turkey	Karaman	IGCH 1243
IGCH 1297	Benha el Asl	Egypt	5	Turkey	Karaman	IGCH 1244
IGCH 1298	Benha el Asl	Egypt	3	Turkey	Lycia	IGCH 1251
IGCH 1299	Benha el Asl	Egypt	2	Turkey	Asia Minor	IGCH 1252
IGCH 1300	Benha el Asl	Egypt	1	Turkey	Selimiye	IGCH 1254
IGCH 1301	Benha el Asl	Egypt	200	Turkey	Cilicia	IGCH 1255
IGCH 1302	Benha el Asl	Egypt	6	Turkey	Cilicia	IGCH 1256
IGCH 1303	Benha el Asl	Egypt	35	Turkey	Cilicia	IGCH 1259
IGCH 1304	Benha el Asl	Egypt	7	Cyprus	Dali	IGCH 1275
IGCH 1305	Benha el Asl	Egypt	2	Turkey	Trabzon	IGCH 1373
IGCH 1306	Benha el Asl	Egypt	18	Turkey	Giresun	IGCH 1383
IGCH 1307	Benha el Asl	Egypt	4	Turkey	Pisidia	IGCH 1408
IGCH 1308	Benha el Asl	Egypt	71	Turkey	Kayseri	IGCH 1416
IGCH 1309	Benha el Asl	Egypt	15	Turkey	Cilicia	IGCH 1421
IGCH 1310	Benha el Asl	Egypt	1	Turkey	Asia Minor	IGCH 1432
IGCH 1311	Benha el Asl	Egypt	40	Turkey	Osmaniye	IGCH 1433
IGCH 1312	Benha el Asl	Egypt	102	Turkey	Asia Minor	IGCH 1454
IGCH 1313	Benha el Asl	Egypt	1	Turkey	Asia Minor	IGCH 1463
IGCH 1314	Benha el Asl	Egypt	12	Syria	Djeble	IGCH 1479
IGCH 1315	Benha el Asl	Egypt	41	Jordan	Jordan	IGCH 1482
IGCH 1316	Benha el Asl	Egypt	35	Lebanon	Massyaf	IGCH 1483
IGCH 1317	Benha el Asl	Egypt	100	Turkey	Marash	IGCH 1484
IGCH 1318	Benha el Asl	Egypt	2	Lebanon	Beither	IGCH 1489
IGCH 1319	Benha el Asl	Egypt	1	Lebanon	Phoenicia	IGCH 1491
IGCH 1320	Benha el Asl	Egypt	1	Israel	Wadi Daliyeh	IGCH 1503
IGCH 1321	Benha el Asl	Egypt	60	Lebanon	Phoenicia	IGCH 1505
IGCH 1322	Benha el Asl	Egypt	40	Syria	Kessab	IGCH 1568
IGCH 1323	Benha el Asl	Egypt	3	Egypt	Delta	IGCH 1632
IGCH 1324	Benha el Asl	Egypt	2	Egypt	Sakha	IGCH 1639
IGCH 1325	Benha el Asl	Egypt	10	Egypt	Benha el Asl	IGCH 1640
IGCH 1326	Benha el Asl	Egypt	131	Egypt	Asyut	IGCH 1644
IGCH 1327	Benha el Asl	Egypt	34	Egypt	Zagazig	IGCH 1645
IGCH 1328	Benha el Asl	Egypt	1	Egypt	Fayum	IGCH 1646
IGCH 1329	Benha el Asl	Egypt	6	Egypt	Naukratis	IGCH 1647
IGCH 1330	Benha el Asl	Egypt	67	Egypt	Naukratis	IGCH 1648

		55	Egypt	Beni Hasan	IGCH 1651
		70	Egypt	Naukratis	IGCH 1652
		52	Egypt	Egypt	IGCH 1659
		39	Egypt	Memphis	IGCH 1660
		12	Egypt	Naukratis	IGCH 1661
		109	Egypt	Tel el Athrib	IGCH 1663
		5	Azerbaijan	Khinisly	IGCH 1745
		6	Iraq	Mesopotamia	IGCH 1747
		37	Iraq	Mesopotamia	IGCH 1757
		4	Iraq	Tigris River	IGCH 1762
		1	Iraq	Urfa	IGCH 1772
		1	Iraq	Babylon	IGCH 1774
		10	Iraq	Tell Ahmar	IGCH 1780
		1	Iraq	Basra	IGCH 1786
		167	Iran	Malayer	IGCH 1790
		1	Iran	Media	IGCH 1813
		151	Afghanistan	Balkh	IGCH 1820
		3	Afghanistan	Balkh	IGCH 1822
		33	Afghanistan	Cabul	IGCH 1830
		8	Italy	Taranto	IGCH 1874
		4	Italy	Pyrgi	IGCH 1905
		1	Italy	Vito Superiore	IGCH 1910
		14	Algeria	Constantine	IGCH 2306
		2	Spain	Pont de Molins	IGCH 2313
Chalkis		1	Egypt	Benha el Asl	IGCH 1640
		1	Egypt	Asyut	IGCH 1644
Chios		1	Turkey	Asia Minor	IGCH 1177
		1	Turkey	Asia Minor	IGCH 1165
		10	Turkey	Erythrae	IGCH 1184
		6	Turkey	Yaka	IGCH 1214
		2	Jordan	Jordan	IGCH 1482
		1	Lebanon	Massyaf	IGCH 1483
		1	Egypt	Mit Rahineh	IGCH 1636
		5	Egypt	Demanhur	IGCH 1637
		1	Egypt	Delta	IGCH 1632
		6	Egypt	Sakha	IGCH 1639
		2	Egypt	Benha el Asl	IGCH 1640
		8	Egypt	Asyut	IGCH 1644
		2	Egypt	Zagazig	IGCH 1645
		1	Egypt	Fayum	IGCH 1646
		1	Egypt	Naukratis	IGCH 1647
		1	Iraq	Malayer	IGCH 1790
		1	Afghanistan	Cabul	IGCH 1830
		1	Italy	Taranto	IGCH 1874
Corcyra		498	Romania	Cisnadie	IGCH 668
		1	Jordan	Jordan	IGCH 1482
		4	Egypt	Asyut	IGCH 1644
		3	Iran	Malayer	IGCH 1790
		1	Afghanistan	Cabul	IGCH 1830

		14	Italy	Taranto	IGCH 1874
		100	Italy	Ionian Shore	IGCH 1916
Corinth		100	Montenegro	Risan	IGCH 391
		1	Turkey	Asia Minor	IGCH 1177
		1	Turkey	Selimiye	IGCH 1254
		1	Jordan	Jordan	IGCH 1482
		4	Egypt	Mit Rahineh	IGCH 1636
		6	Egypt	Demanhur	IGCH 1637
		1	Egypt	Delta	IGCH 1632
		8	Egypt	Sakha	IGCH 1639
		29	Egypt	Asyut	IGCH 1644
		1	Egypt	Zagazig	IGCH 1645
		2	Italy	Sambiase	IGCH 1872
		13	Italy	Taranto	IGCH 1874
		1	Italy	Calabria	IGCH 1908
		8	Italy	Vito Superiore	IGCH 1910
		10	Italy	Metaponto	IGCH 1949
		4	Italy	Torchiarolo	IGCH 1978
		1	Spain	Mongo	IGCH 2312
Delos		1	Jordan	Jordan	IGCH 1482
		1	Egypt	Demanhur	IGCH 1637
Delphi		7	Egypt	Asyut	IGCH 1644
		1	Egypt	Zagazig	IGCH 1645
Dikaia		1	Egypt	Mit Rahineh	IGCH 1636
		3	Egypt	Demanhur	IGCH 1637
		1	Egypt	Delta	IGCH 1632
		1	Egypt	Sakha	IGCH 1639
		3	Egypt	Asyut	IGCH 1644
		1	Egypt	Zagazig	IGCH 1645
Elis		1	Jordan	Jordan	IGCH 1482
		1	Egypt	Naukratis	IGCH 1652
Epirote Kings, Pyrrhos		20	Italy	Gerace	IGCH 1972
		70	Italy	Gerace	IGCH 1973
Eretria		1	Lebanon	Massyaf	IGCH 1483
		1	Egypt	Sakha	IGCH 1639
		1	Egypt	Benha el Asl	IGCH 1640
		5	Egypt	Asyut	IGCH 1644
		3	Iraq	Babylon	IGCH 1774
Euboian League		1	Bulgaria	Mahala	IGCH 772
Histiaia		1	Bulgaria	Garbino	IGCH 860
		116	Bulgaria	Sumen	IGCH 942
		43	Bulgaria	Blatnica	IGCH 944
		206	Bulgaria	Jakordua	IGCH 945
		10	Bulgaria	Kjustendil	IGCH 946
		163	Bulgaria	Guesevo	IGCH 947
		160	Bulgaria	Nevrokop	IGCH 948
		30	France	Nice	IGCH 2379
Ialysos		1	Turkey	Ionia	IGCH 1195
		1	Egypt	Demanhur	IGCH 1637

		1	Egypt	Sakha	IGCH 1639
		4	Egypt	Asyut	IGCH 1644
Kalymna		1	Italy	Taranto	IGCH 1874
Kamiros		1	Egypt	Sakha	IGCH 1639
		5	Egypt	Asyut	IGCH 1644
		1	Egypt	Zagazig	IGCH 1645
Karystos		3	Egypt	Asyut	IGCH 1644
Karthaia		1	Italy	Taranto	IGCH 1874
Kaphyai		1	Croatia	Mazin	IGCH 644
Kos		1	Turkey	Asia Minor	IGCH 1165
		1	Turkey	Asia Minor	IGCH 1207
		1	Turkey	Pademlik	IGCH 1218
		1	Turkey	Fethiye	IGCH 1266
		1	Egypt	Mit Rahineh	IGCH 1636
		1	Egypt	Demanhur	IGCH 1637
		1	Egypt	Delta	IGCH 1632
		2	Iraq	Babylon	IGCH 1774
Larissa		1	Bulgaria	Novo selo	IGCH 861
Lesbos		57	Turkey	Erythrae	IGCH 1184
		1	Egypt	Asyut	IGCH 1644
Lete		1	Romania	Nevrokop	IGCH 693
		12	Syria	Ras Shamra	IGCH 1478
		2	Jordan	Jordan	IGCH 1482
		1	Egypt	Mit Rahineh	IGCH 1636
		1	Egypt	Delta	IGCH 1632
		4	Egypt	Sakha	IGCH 1639
		10	Egypt	Benha el Asl	IGCH 1640
		1	Afghanistan	Balkh	IGCH 1820
		18	Italy	Taranto	IGCH 1874
Leukas		1	Egypt	Asyut	IGCH 1644
		1	Iran	Malayer	IGCH 1790
		1	Italy	Vito Superiore	IGCH 1910
		1	Italy	Paestum	IGCH 1925
		1	Italy	Torchiarolo	IGCH 1978
Lindos		5	Egypt	Asyut	IGCH 1644
		1	Iraq	Malayer	IGCH 1790
Mantineia		1	Egypt	Memphis	IGCH 1643
Macedonia		36	Bulgaria	Ablanica	IGCH 890
		16	Egypt	Asyut	IGCH 1644
		1	Afghanistan	Balkh	IGCH 1820
Macedonian Kings, Alexander I		5	Turkey	Asia Minor	IGCH 1182
		1	Jordan	Jordan	IGCH 1482
		1	Egypt	Asyut	IGCH 1644
Macedonian Kings, Philip II		51	Bulgaria	Samovodene	IGCH 395
		100	Bulgaria	Gorno Cerkoviste	IGCH 396
		20	Bulgaria	Bjala	IGCH 398
		4	Bulgaria	Raskovo	IGCH 403
		1000	Bulgaria	Vlasatica	IGCH 424
		10	Bulgaria	Curtea de Arges	IGCH 425

17	Romania	Bruuiu	IGCH 426
16	Bulgaria	IPavlikeni	IGCH 434
1	Bulgaria	Ogoja	IGCH 435
11	Bulgaria	Careva poljana	IGCH 727
63	Bulgaria	Sredec	IGCH 729
31	Bulgaria	Popovo	IGCH 730
10	Bulgaria	Alexandrovo	IGCH 731
60	Bulgaria	Gorica	IGCH 732
30	Bulgaria	Kitno	IGCH 733
17	Bulgaria	Sofia	IGCH 737
10	Bulgaria	Bulgaria	IGCH 773
17	Bulgaria	Stambolovo	IGCH 775
10	Bulgaria	Jasna poljana	IGCH 777
94	Bulgaria	Brestovza	IGCH 778
137	Bulgaria	Izvorno	IGCH 784
5	Moldova	Lergutsa	IGCH 800
1	Ukraine	Roksolany	IGCH 818
30	Bulgaria	Ribno	IGCH 820
150	Bulgaria	Gorni Pasarel	IGCH 822
60	Bulgaria	Dragomir	IGCH 823
11	Bulgaria	Borimeckovo	IGCH 824
20	Bulgaria	Stara selo	IGCH 825
40	Bulgaria	Jabalkovo	IGCH 827
22	Bulgaria	Malko Topolovo	IGCH 853
4	Ukraine	Anadol	IGCH 866
15	Bulgaria	Samovodene	IGCH 395
80	Bulgaria	Gorno Cerkoviste	IGCH 396
22	Bulgaria	Gostilica	IGCH 397
1	Bulgaria	Bjala	IGCH 398
200	Macedonia	Topolcane	IGCH 399
200	Romania	Drencova	IGCH 400
6	Romania	Codlea	IGCH 409
5	Romania	Sopotu Vechi	IGCH 428
6	Bulgaria	Bistrec	IGCH 429
15	Bulgaria	Musina	IGCH 430
30	Bulgaria	Ogoja	IGCH 435
4	Serbia	Jabukovac	IGCH 447
76	Macedonia	Prilipek	IGCH 448
14	Romania	Vedea	IGCH 449
1	Romania	Turnu Severin	IGCH 452
51	Bulgaria	Slana bara	IGCH 454
9	Serbia	Zemun	IGCH 458
57	Romania	Chisineu Cris	IGCH 459
48	Romania	Rasa	IGCH 460
106	Romania	Banat	IGCH 463
4	Romania	Gildau	IGCH 774
5	Bulgaria	Stambolovo	IGCH 775
14	Bulgaria	Jasna poljana	IGCH 777
41	Bulgaria	Brestovza	IGCH 778

Macedonian Kings, Alexander III

63	Bulgaria	Izvorno	IGCH 784
100	Bulgaria	Goljamo Sivacevo	IGCH 785
102	Bulgaria	Goljamo Cocoveni	IGCH 786
212	Bulgaria	Asparuhova	IGCH 789
500	Bulgaria	Cernevo	IGCH 790
300	Bulgaria	Jarebicna	IGCH 792
50	Bulgaria	Vinograd	IGCH 793
2	Romania	Galati	IGCH 799
1	Bulgaria	Blagun	IGCH 849
1	Bulgaria	Malko Topolovo	IGCH 853
8	Bulgaria	Pet mogili	IGCH 856
320	Bulgaria	Novo selo	IGCH 861
55	Ukraine	Anadol	IGCH 866
10	Turkey	Buyukcekmece	IGCH 867
7	Romania	Marasesti	IGCH 958
4	Turkey	Karaman	IGCH 1398
13	Turkey	Ankara	IGCH 1399
3	Turkey	Aksaray	IGCH 1400
16	Turkey	Gordium	IGCH 1403
7	Turkey	Gordium	IGCH 1405
5	Turkey	Gordium	IGCH 1406
158	Turkey	Mektepini	IGCH 1410
4	Turkey	Asia Minor	IGCH 1411
10	Turkey	Asia Minor	IGCH 1412
13	Turkey	Ayaz-In	IGCH 1413
2	Turkey	Cilicia	IGCH 1421
3	Turkey	Asia Minor	IGCH 1422
122	Turkey	Armenak	IGCH 1423
23	Turkey	Mersin	IGCH 1424
1	Turkey	Asia Minor	IGCH 1426
1	Turkey	Asia Minor	IGCH 1432
12	Turkey	Asia Minor	IGCH 1436
28	Turkey	Asia Minor	IGCH 1438
19	Turkey	Asia Minor	IGCH 1439
32	Turkey	Asia Minor	IGCH 1440
3	Turkey	Asia Minor	IGCH 1441
2	Turkey	Asia Minor	IGCH 1442
5	Turkey	Asia Minor	IGCH 1443
1	Turkey	Asia Minor	IGCH 1447
5	Turkey	Asia Minor	IGCH 1450
6	Israel	Khirbet el Kerak	IGCH 1510
1	Syria	Sfire	IGCH 1511
9	Syria	Baalbek	IGCH 1512
4	Lebanon	Phoenicia	IGCH 1513
7	Israel	Tel Tsippor	IGCH 1514
8	Lebanon	Byblus	IGCH 1515
175	Syria	Aleppo	IGCH 1516
4	Lebanon	Beirut	IGCH 1518
1	Israel	Galilee	IGCH 1520

		2	Syria	Syria	IGCH 1533
		9	Syria	Latakia	IGCH 1536
		3	Syria	Kosseir	IGCH 1537
		2	Syria	Dniye	IGCH 1538
		4	Syria	Baiyada	IGCH 1541
		20	Syria	Latakia	IGCH 1544
		1673	Egypt	Demanhur	IGCH 1664
		22	Egypt	Egypt	IGCH 1665
		33	Egypt	Abu Hommos	IGCH 1667
		6	Egypt	Egypt	IGCH 1668
		11	Egypt	Egypt	IGCH 1669
		79	Egypt	Phacous	IGCH 1678
		2	Armenia	Diyarbakir	IGCH 1735
		6	Iraq	Mesopotamia	IGCH 1751
		1	Iraq	Mosul	IGCH 1756
		13	Iraq	Babylonia	IGCH 1761
		13	Iraq	Tel Halaf	IGCH 1763
		10	Iraq	Mesopotamia	IGCH 1764
		2	Iraq	Mosul	IGCH 1768
		2	Iraq	Mesopotamia	IGCH 1769
		4	Iraq	Urfa	IGCH 1772
		6	Iraq	Tell Kotchek	IGCH 1773
		11	Iraq	Babylon	IGCH 1774
		93	Iraq	Basra	IGCH 1786
		2	Iran	Pasargadae	IGCH 1794
		4	Iran	Susiana	IGCH 1806
		2	Iran	Susa	IGCH 1808
		3	Iran	Media	IGCH 1813
		2	Bulgaria	Malko Topolovo	IGCH 853
		2	Turkey	Buyukcekmece	IGCH 867
		1	Turkey	Mektepini	IGCH 1410
		10	Turkey	Mersin	IGCH 1424
		4	Turkey	Asia Minor	IGCH 1447
		3	Turkey	Asia Minor	IGCH 1450
		1	Iraq	Tel Halaf	IGCH 1763
		4	Iraq	Mesopotamia	IGCH 1764
		8	Turkey	Mektepini	IGCH 1410
		9	Turkey	Asia Minor	IGCH 1426
		1	Syria	Syria	IGCH 1533
		1	Syria	Aleppo	IGCH 1539
		5	Syria	Aleppo	IGCH 1562
		5	Iraq	Urfa	IGCH 1772
		6	Turkey	Mektepini	IGCH 1410
		1	Turkey	Asia Minor	IGCH 1411
		1	Turkey	Asia Minor	IGCH 1451
		1	Syria	Syria	IGCH 1533
		2	Syria	Syria	IGCH 1535
		2	Syria	Latakia	IGCH 1536
		1	Iraq	Urfa	IGCH 1772
Macedonian Kings, Demetrios Poliorketes					
Macedonian Kings, Antigonos II					
Macedonian Kings, Antigonos III					

Macedonian Kings, Philip V	1	Serbia	Djoran	IGCH 555
Macedonian Kings, Perseus	100	Turkey	Mersin	IGCH 1431
Macedonian Republic	70	Bulgaria	Krusevo	IGCH 485
	37	Bulgaria	Krasno gradiste	IGCH 486
	110	Bulgaria	Novgorod	IGCH 487
	6	Bulgaria	Slatina	IGCH 488
	22	Bulgaria	Rakita	IGCH 489
	2	Bulgaria	Gorni Dabnik	IGCH 490
	4	Bulgaria	Jasen	IGCH 491
	4	Bulgaria	Kilovici	IGCH 492
	40	Bulgaria	Novae	IGCH 493
	10	Bulgaria	Bozurica	IGCH 494
	7	Bulgaria	Gortalovo	IGCH 495
	17	Bulgaria	Ralevo	IGCH 496
	22	Bulgaria	Riben	IGCH 497
	10	Bulgaria	Nikolaevo	IGCH 498
	8	Bulgaria	Lipnica	IGCH 499
	44	Bulgaria	Banja	IGCH 500
	3	Bulgaria	Kameno Pole	IGCH 501
	8	Bulgaria	Mramoren	IGCH 502
	28	Bulgaria	Baurene	IGCH 503
	15	Bulgaria	Lesura	IGCH 504
	9	Bulgaria	Portitovci	IGCH 505
	111	Bulgaria	Tarnava	IGCH 506
	24	Bulgaria	Berkovica	IGCH 507
	23	Bulgaria	Belotinci	IGCH 508
	100	Bulgaria	Studeno Buce	IGCH 509
	122	Romania	Viisoara	IGCH 510
	6	Romania	Merenii de Sus	IGCH 511
	97	Romania	Caprioru	IGCH 514
	1	Romania	Jigodin	IGCH 516
	39	Romania	Mura Mica	IGCH 517
	2	Romania	Sovata	IGCH 518
	340	Bulgaria	Gorna Orjahovica	IGCH 521
	1	Bulgaria	Samovodene	IGCH 522
	8	Romania	Cugir	IGCH 528
	67	Romania	Brincoveanu	IGCH 623
	10	Romania	Merisanii	IGCH 630
	2	Romania	Sinpetru	IGCH 637
	3	Romania	Hiresova	IGCH 895
	10	Bulgaria	Krlev dol	IGCH 894
	8	Bulgaria	Pirgovo	IGCH 896
	4	Bulgaria	Trastikovo	IGCH 897
	2	Bulgaria	Mericeri	IGCH 908
	2	Turkey	Asia Minor	IGCH 1432
	1	Romania	Jigodin	IGCH 516
	48	Bulgaria	Vlasica	IGCH 529
	1	Bulgaria	Nedan	IGCH 531
	1	Bulgaria	Gradesnica	IGCH 571
Maroneia				

		1	Romania	Bosneagu	IGCH 628
		1	Romania	Furculesti	IGCH 631
		1	Romania	Singeorzu Nou	IGCH 638
		5	Romania	Rodina	IGCH 679
		51	Bulgaria	Karzali	IGCH 803
		60	Bulgaria	Strojno	IGCH 926
		100	Bulgaria	Dzebel	IGCH 938
		25	Bulgaria	Starcevo	IGCH 939
		7	Bulgaria	Nova Zagora	IGCH 963
Melos		2	Lebanon	Massyaf	IGCH 1483
		3	Egypt	Asyut	IGCH 1644
		6	Iran	Malayer	IGCH 1790
		1	Afghanistan	Cabul	IGCH 1830
Mende		2	Egypt	Delta	IGCH 1632
		2	Egypt	Benha el Asl	IGCH 1640
		15	Egypt	Asyut	IGCH 1644
		4	Egypt	Zagazig	IGCH 1645
		1	Egypt	Fayum	IGCH 1646
		2	Italy	Taranto	IGCH 1874
Mytilene		1	Turkey	Troas	IGCH 1188
Naxos		1	Egypt	Mit Rahineh	IGCH 1636
		2	Egypt	Demanhur	IGCH 1637
		2	Egypt	Sakha	IGCH 1639
		1	Egypt	Benha el Asl	IGCH 1640
		3	Egypt	Asyut	IGCH 1644
		2	Italy	Taranto	IGCH 1874
Neapolis		4	Egypt	Demanhur	IGCH 1637
		1	Egypt	Delta	IGCH 1632
		1	Egypt	Sakha	IGCH 1639
		2	Egypt	Benha el Asl	IGCH 1640
		1	Egypt	Fayum	IGCH 1646
Olynthos		1	Egypt	Asyut	IGCH 1644
Paros		1	Egypt	Mit Rahineh	IGCH 1636
		4	Egypt	Demanhur	IGCH 1637
		2	Egypt	Sakha	IGCH 1639
		6	Egypt	Asyut	IGCH 1644
		1	Egypt	Zagazig	IGCH 1645
Pella		13	Serbia	Djoran	IGCH 555
Peparethos		1	Egypt	Asyut	IGCH 1644
		1	Italy	Taranto	IGCH 1874
Poseideion, Karpathos		1	Egypt	Zagazig	IGCH 1645
Potidaia		1	Egypt	Mit Rahineh	IGCH 1636
		6	Egypt	Asyut	IGCH 1644
		4	Egypt	Zagazig	IGCH 1645
		3	Italy	Taranto	IGCH 1874
Rhodes		2	Turkey	Durasalar	IGCH 1201
		15	Turkey	Asia Minor	IGCH 1204
		84	Turkey	Marmaris	IGCH 1209
		120	Turkey	Caria	IGCH 1287

		4	Turkey	Pazarlik	IGCH 1288
		1	Turkey	Caria	IGCH 1290
		31	Turkey	Mugla	IGCH 1292
		50	Turkey	Tarahia	IGCH 1312
		1	Turkey	Priene	IGCH 1330
		18	Turkey	Caria	IGCH 1335
		48	Turkey	Fethiye	IGCH 1428
		3	Lebanon	Saida	IGCH 1508
Samos		1	Turkey	Colophon	IGCH 1183
		1	Turkey	Durasalar	IGCH 1201
		1	Turkey	Pademlik	IGCH 1218
		1	Turkey	Cilicia	IGCH 1259
		3	Egypt	Demanhur	IGCH 1637
		1	Egypt	Delta	IGCH 1632
		1	Egypt	Sakha	IGCH 1639
		15	Egypt	Asyut	IGCH 1644
		1	Egypt	Zagazig	IGCH 1645
		3	Egypt	Naukratis	IGCH 1647
		1	Iraq	Mesopotamia	IGCH 1747
		2	Iraq	Malayer	IGCH 1790
		1	Iran	Susa	IGCH 1792
		2	Afghanistan	Cabul	IGCH 1830
Samothrace		1	Iraq	Babylon	IGCH 1774
Sermyle		2	Egypt	Asyut	IGCH 1644
		1	Egypt	Delta	IGCH 1632
Sikyon		1	Lebanon	Beirut	IGCH 1500
Skione		1	Egypt	Demanhur	IGCH 1637
		2	Egypt	Asyut	IGCH 1644
Stagira		4	Syria	Ras Shamra	IGCH 1478
		1	Egypt	Demanhur	IGCH 1637
		1	Egypt	Asyut	IGCH 1644
Syros		1	Syria	Akkar	IGCH 1559
		1	Syria	Aleppo	IGCH 1562
Tanagra		3	Egypt	Asyut	IGCH 1644
Tenos		2	Italy	Taranto	IGCH 1874
Terone		1	Egypt	Egypt	IGCH 1634
		1	Egypt	Benha el Asl	IGCH 1640
		11	Egypt	Asyut	IGCH 1644
		1	Egypt	Zagazig	IGCH 1645
		1	Iran	Malayer	IGCH 1790
Thasos		6	Bulgaria	Slatina	IGCH 488
		10	Bulgaria	Gorni Dabnik	IGCH 490
		2	Bulgaria	Jasen	IGCH 491
		2	Bulgaria	Kilovici	IGCH 492
		6	Bulgaria	Bozurica	IGCH 494
		7	Bulgaria	Gortalovo	IGCH 495
		8	Bulgaria	Nikolaev	IGCH 498
		2	Bulgaria	Tarnava	IGCH 506
		13	Romania	Viisoara	IGCH 510

IGCH 514	Caprioru	4	Romania
IGCH 516	Jigodin	15	Romania
IGCH 517	Mura Mica	128	Romania
IGCH 518	Sovata	10	Romania
IGCH 519	Cluj	2	Romania
IGCH 522	Samovodene	15	Bulgaria
IGCH 525	Hotnica	62	Bulgaria
IGCH 527	Amara	4	Romania
IGCH 529	Vlasica	11	Bulgaria
IGCH 530	Varbovka	47	Bulgaria
IGCH 531	Nedan	102	Bulgaria
IGCH 533	Krusovica	90	Bulgaria
IGCH 534	Zgalevo	12	Bulgaria
IGCH 535	Lzdzane	150	Bulgaria
IGCH 536	Nikolaev	40	Bulgaria
IGCH 537	Bjala Slatina	74	Bulgaria
IGCH 538	Gradesnica	60	Bulgaria
IGCH 540	Novo selo	4	Bulgaria
IGCH 541	Plumbuita	500	Romania
IGCH 543	Brasov	10	Romania
IGCH 544	Ghelinta	200	Romania
IGCH 545	Casolt	100	Romania
IGCH 546	Magherani	5	Romania
IGCH 547	Graniceri	120	Romania
IGCH 548	Adinca	6	Romania
IGCH 559	Bakerr	3	Albania
IGCH 570	Lipnica	19	Bulgaria
IGCH 571	Gradesnica	400	Bulgaria
IGCH 572	Rupci	4	Bulgaria
IGCH 573	Sadovec	40	Bulgaria
IGCH 574	Sadovec	1	Bulgaria
IGCH 575	Valci tran	64	Bulgaria
IGCH 576	Belene	1	Bulgaria
IGCH 577	Pianul de Sus	1	Romania
IGCH 622	Stoenesti	14	Romania
IGCH 623	Brincoveanu	16	Romania
IGCH 624	Berceni	2	Romania
IGCH 628	Bosneagu	30	Romania
IGCH 630	Merisanii	2	Romania
IGCH 631	Furculesti	15	Romania
IGCH 638	Singeorzu Nou	95	Romania
IGCH 647	Poroschia	39	Romania
IGCH 649	Varmaga	3	Romania
IGCH 654	Hotarani	3	Romania
IGCH 656	Sfintesti	13	Romania
IGCH 662	Stancuta	53	Romania
IGCH 691	Venkovec	1	Romania
IGCH 692	Nevrokop	1	Romania
IGCH 695	Krusevo	51	Bulgaria

	200	Bulgaria	Vaksevo	IGCH 701
	61	Bulgaria	Benkovski	IGCH 702
	21	Bulgaria	Pazardzik	IGCH 703
	200	Bulgaria	Dupnica	IGCH 712
	100	Bulgaria	Sofia	IGCH 713
	197	Bulgaria	Skrevatno	IGCH 720
	16	Bulgaria	Gorni Domljan	IGCH 742
	6	Romania	Hiresova	IGCH 895
	44	Bulgaria	Maglis	IGCH 915
	60	Bulgaria	Benkovski	IGCH 916
	25	Bulgaria	Benovski	IGCH 918
	100	Bulgaria	Strojno	IGCH 926
	170	Bulgaria	Popina	IGCH 930
	3	Bulgaria	Nova Zagora	IGCH 963
	35	Bulgaria	Lipnik	IGCH 968
	89	Romania	Ostrov	IGCH 980
	1	Turkey	Asia Minor	IGCH 1182
	1	Cyprus	Cyprus	IGCH 1277
	1	Jordan	Jordan	IGCH 1482
	1	Lebanon	Massyaf	IGCH 1483
	12	Egypt	Demanhur	IGCH 1637
	1	Egypt	Delta	IGCH 1632
	1	Egypt	Sakha	IGCH 1639
	2	Egypt	Benha el Asl	IGCH 1640
	27	Egypt	Asyut	IGCH 1644
	1	Egypt	Zagazig	IGCH 1645
	2	Afghanistan	Cabul	IGCH 1830
	11	Italy	Taranto	IGCH 1874
	3	Iran	Malayer	IGCH 1790
Thebes	1	Lebanon	Massyaf	IGCH 1483
Thera	1	Italy	Taranto	IGCH 1874
Thessalonica	10	Serbia	Djoran	IGCH 555
Thessaly	1	Iraq	Nisibis	IGCH 1788
Thracian Kings, Lysimachos	15	Ukraine	Anadol	IGCH 866
	1	Turkey	Buyukcekmece	IGCH 867
	26	Turkey	Armenak	IGCH 1423
	2	Turkey	Mersin	IGCH 1424
	5	Syria	Homs	IGCH 1532
	2	Iraq	Mesopotamia	IGCH 1769
	1	Iraq	Zivnik	IGCH 1771
	2	Iraq	Urfa	IGCH 1772
Thraco-Macedonian Tribes	11	Serbia	Ishtib	IGCH 355
	10	Bulgaria	Velickovo	IGCH 690
	15	Syria	Ras Shamra	IGCH 1478
	2	Syria	Seleucis	IGCH 1480
	4	Jordan	Jordan	IGCH 1482
	2	Lebanon	Massyaf	IGCH 1483
	2	Egypt	Egypt	IGCH 1634
	1	Egypt	Fayum	IGCH 1635

	2	Egypt	Mit Rahineh	IGCH 1636
	34	Egypt	Demanhur	IGCH 1637
	1	Egypt	Delta	IGCH 1632
	8	Egypt	Sakha	IGCH 1639
	7	Egypt	Benha el Asl	IGCH 1640
	2	Egypt	Damietta	IGCH 1642
	48	Egypt	Asyut	IGCH 1644
	5	Egypt	Zagazig	IGCH 1645
	1	Egypt	Fayum	IGCH 1646
	2	Iran	Malayer	IGCH 1790
	2	Afghanistan	Balkh	IGCH 1820
Thyreium	11	Italy	Salve	IGCH 2030
TOTAL COINS	19355			

Roman Republican and Imperial Coins

If mint origin is considered a legitimate basis for modern Greek claims on coins of the archaic through Hellenistic periods, by the same logic the Hellenic Republic must then be prepared to give up almost all of the Roman republican and imperial coins found within its borders. With the exception of a very few republican and early imperial denarii and fractions possibly struck briefly on islands like Corcyra and Samos, and the late Roman emissions from the imperial mint of Thessalonica, almost no Roman republican or imperial coins were produced in the territory of modern Greece. However they certainly circulated there, as evidenced by reported hoards. Table 2 presents a picture of the republican hoard material as of 1994, while I. P. Touratsoglou has catalogued some 24 hoards containing a total of 44,864 coins, presented in Table 3.⁶ The number of finds of Roman republican and imperial coins in Greece is significantly higher than the data here might suggest. The tables do not include unreported private finds or find records from archaeological sites. Likewise, Table 3 only includes hoards closed in the period between AD 234 and 249. Bearing these limitations in mind, it should be very clear that Roman imperial coins are found in Greece in very great quantities. However, since few of these coins were actually struck in Greece, the false rationale of mint origin determining cultural ownership would require the Hellenic Republic to repatriate this vast material to the countries in which it was produced. Roman imperial mints operated in what is now modern Egypt (Alexandria), Tunisia (Karthago/Carthage), France (Ambianum/Amiens, Arelate/Arles, Lugdunum/Lyon), Spain (Barcino/Barcelona), the United Kingdom (Camulodunum/Colchester, Londinium/London), Turkey (Constantinople/Istanbul, Cyzicus, Heraclea/Eregli, Nicomedia/Izmit, Antioch/Antakya), Bulgaria (Serdica/Sofia), Croatia (Siscia/Sisak), Serbia (Sirmium/Sremska Mitrovica), and Germany (Treviri/Trier).

⁶ I. P. Touratsoglou, *Greece and the Balkans before the End of Antiquity* (Athens, 2006).

Table 2: Roman Republican Hoard Finds in Greece

Coins	Findspot	Reference
3	Hierapytna	IGCH 318
200	Hierapytna	IGCH 352
1	Lechaena	CH VIII 417
1	Vonitsa	CH VIII 431
2	Nekromantion	CH VIII 530
17	Preveza	CH VIII 542
17	Dolj County	CH VIII 543
100	Cavalla	IGCH 660
3	Platania	IGCH 663
1	Veroia	CH VII 97
1	South Macedonia	CH VII 102
91	Macedonia	CH VII 139
TOTAL COINS	435	

Table 3: Roman Imperial Hoard Finds in Greece (Third Century AD)

Coins	Findspot	Reference
127	Pontoherakleia	T 439
440	Beroea-Vergina	T 440
21	"Macedonia"	T 445
12	Eleusis	T 449
100	Eleusis	T 450
6	Athens	T 451
39	Peristeria	T 452
12	Delphi	T 453
23	Patra	T 454
38	Patra	T 455
12	"Corinth"	T 456
37	"Greece"	T 457
2,500	Akriai	T 458
5,044	Sparta	T 459
786	Argyroupolis	T 463
20	Boeotia	T 477
235	"Greece"	T 478
111	Unknown	T 479
7	Tinos	T 480
5	Macedonia	T 524
14	Athens	T 525
16	Athens	T 526
259	Aghia Galini	T 527
35,000	Syryna I	T 549
TOTAL COINS	44,864	

Byzantine, Medieval, and Ottoman Coins

With the exception of coins struck at the branch mints of Thessalonica (operational 498-630 and 1081-end of the fourteenth century), Arta (operational 1204-1271), and perhaps Corinth in the period 1143-1195, no Byzantine imperial coins were struck within the borders of modern Greece. The primary Byzantine mint supplying coins for Greece was in fact Constantinople, but if mint location is the basis for determining right of ownership, the Constantinopolitan issues found in Greece must actually belong to Turkey. Despite its past as the capital of the Byzantine Empire, Constantinople is now Istanbul and lies within the borders of the modern Republic of Turkey.

Similarly, medieval coins found in what is now the Hellenic Republic, but originating at European mints (particularly French and Italian) beyond its borders, should not be claimed as part of Greek cultural heritage under the same erroneous rationale that would make ancient coins from Greek mints the sole purview of modern Greece. The only medieval mints that might be legitimately claimed are the Frankish issues struck at Thessalonica, Glarentza, Carytaena, Damala, Athens, Negroponte, Lepanto, Arta, Neopatras, Naxos, Tenos, Chios, and Rhodes from the thirteenth to the fifteenth centuries. However, the very close similarity of many of these coins to Constantinopolitan Byzantine issues and to contemporary European medieval coins (especially Venice) makes it difficult to imagine how U.S. customs agents could even begin to distinguish them unless they already happen to be specialists in the coinage of Frankish Greece. As such specialist agents are likely to be few, one wonders whether the Hellenic Republic, already lurching towards bankruptcy, intends to foot the bill for training U.S. customs employees in the finer points of medieval Greek numismatics.

As in the Byzantine and Frankish periods, coins produced at Istanbul (Constantinople) were an important part of the circulating medium in mainland Greece. However, the only Ottoman imperial coins struck within the borders of the modern Hellenic Republic were produced at the mints of Selanik (Thessaloniki), Sidrekapsi (Siderokafsia), Skadiz (Chios), and Serez (Serres).⁷ Distinguishing Ottoman coins issued by Greek mints from those of other Ottoman imperial mints is even more difficult than recognizing coins of Frankish Greece, in that knowledge of Arabic and Turkish script is required.

Summary

As we have shown, there is some difficulty in determining precisely which material should be considered "Greek". If the argument of mint origin as the basis for cultural ownership of coins is accepted it will set the stage for almost endless international wrangling over find material in the future. This rationale also betrays a privileging of the archaic, classical, and Hellenistic past in Greece at the expense of its Roman, Byzantine, Medieval, and Ottoman heritage. Such privileging should not be evident if Greek concerns for the material are solely motivated by a general desire to preserve cultural heritage.

⁷ S. Sreckovic, *Mints of the Ottoman Empire* (Beograd, 2002).