



ANCIENT COIN COLLECTORS GUILD

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December 26, 2011

Prof. Patty Gerstenblith
Chair, Cultural Property Advisory Committee
Cultural Heritage Center, 2200 C Street NW
Washington, DC 20037

Re: Public Comment on MOU hearing - Cyprus Renewal

Dear Professor Gerstenblith and CPAC members;

In 2007, the ACCG assembled and provided to CPAC for its consideration an analysis of ancient Cypriot coins found in documented hoards outside of the boundaries of the modern Republic of Cyprus—uncontestable evidence that these coins circulated widely during antiquity and since. One member of the committee opined that this evidence, attached again here, was a deciding factor in the committee's recommendation to exempt ancient coins from the provisions of the MOU under consideration. The fact that CPAC did vote in favor of such an exemption has since been confirmed publicly by the residing Chair at that time. This was an exceptional event, since committee membership was already at that time skewed in favor of the archaeological position advocating broad restrictions on cultural artifacts. That rational and laudable action was, however, eclipsed when ECA chose to reject the CPAC recommendation and to include coins in the MOU irrespectively.

Since that 2007 deliberation, the credibility of CPAC has steadily diminished in a wave of senseless and ill-conceived restrictions on insignificant utilitarian objects. With the contrived Cyprus restrictions standing as a precedent, similar restrictions have been placed on coins from China, Italy, Greece and undoubtedly soon to be on coins from Bulgaria. These restrictions insult the letter and intent of the Convention on Cultural Property Implementation Act. The process of comment and balanced views that inspired the foundation of this committee, and the mandated safeguards built into the law itself, have been subsumed by an unholy alliance between government and special interests. What Congress deliberated over for more than a decade, and codified through much thoughtful negotiation, has essentially been invalidated by bureaucratic manipulation.

Not only does the ACCG and its membership oppose unreasonable import restrictions on ancient coins, we condemn the extralegal process through which these restrictions have been entered into force. We appeal to the present committee members, individually and collectively, to restore the rule of law and to deliberate in a manner that recognizes the interests of all stakeholders. That would include private collectors and independent scholars who are the real victims of this misdirected effort to eliminate looting of archaeological sites. The exemption for coins should in all fairness be restored.

Sincerely yours,

Wayne G. Sayles

Atch: Cypriot Coin Hoard Analysis

Incidence of Archaic and Classical coins from Cypriot Mints recorded outside of Cyprus

Asyut Hoard ca. 475 BC, Found in Egypt, 1969

900+ coins, **42 from Cyprus**

“Archaic Greek Silver Coinage, The Asyut Hoard”

Martin Price (British Museum) and Nancy Waggoner (American Numismatic Society).

Price and Waggoner comments:

Page 9. “Hoards of coins, unlike other antiquities, are almost always found by chance, not by purposeful excavation.”

Page 13. “The chronology of coinage, particularly the relative contemporaneity of coins of different cities, relies mainly on hoards.”

Point: The chronology of coins, which might be of some use to an archaeologist, is and has always been determined by analysis of coins found in places other than archaeological excavations. The overwhelming majority of studies relating to the dating of individual coin types have been undertaken and published by private individuals or museum curators working with donated private collections.

Mit Rahineh Hoard ca. 500 BC, Found in Egypt (near Memphis), 1860

23+ coins, **1 stater from Cyprus.**

Longperrier *Revue Numismatique* 1861. pp. 414-28.

Dressel *Zeitschrift für Numismatik*, 1900. p. 254.

Schlumberger. *L'argent grec*. p. 10, no. 34.

May *Numismatic Chronicle*, 1965. p. 1-25.

Memphis Hoard ca. 480 BC, Found in Egypt, 1920

4 coins, **1 from Cyprus.**

Thompson-Mørkholm-Kraay, *Inventory of Greek Coin Hoards*, 1973, no. 1643, p. 229.

Zagazig Hoard ca. 470 BC, Found in Egypt, 1901

84 coins, **1 from Cyprus.**

Thompson-Mørkholm-Kraay, *Inventory of Greek Coin Hoards*, 1973, no. 1901, p. 231.

Delta Hoard ca. 500 BC, Found in Egypt, 1887

30 coins, **2 from Cyprus.**

Dressel-Regling, *Zeitschrift für Numismatik* 1927, pp. 28-104.

May, *Numismatic Chronicle*, 1965. p.1-25; 5-7

Demanur Hoard ca. 500 BC, Found in Egypt, 1900-1901

165 coins, **9 from Cyprus.**

Dressel-Regling, *Zeitschrift für Numismatik* 1927, pp. 28-104.

May, *Numismatic Chronicle*, 1965. p.1-25; 5-7

Egypt ca. 480 BC, found in 1955

23 coins, **1 from Cyprus.**

Coin Hoards I, no. 7, p. 6.

Egypt 500 B.C., found in 1971/72

14 coins, **1 from Cyprus.**

Coin Hoards II, no. 10, p. 11.

Behna el Asl Hoard ca. 485 B.C., found in Egypt 1929

77+ coins, **4 from Cyprus.**

Robinson, *Numismatic Chronicle* 1930, pp. 93-106.

Fayum Hoard ca. 460 B.C., found in Egypt 1957

15 coins, **3 from Cyprus.**

Thompson-Mørkholm-Kraay, *Inventory of Greek Coin Hoards*, 1973, no. 1646, p. 231.

Persepolis before 511 B.C., found in Western Iran in 1933

12 coins, **1 from Cyprus**

Herzfeld, *Transactions of the Int'l Numismatic Congress, London June 30 - July 3, 1936*, pp.413-414.

Schlumberger. *L'argent grec*. p. 11 # 43

Schmidt, *Persepolis 2* (Chicago, 1957), pp. 110, 113-114.

Malayer Hoard, ca. 375 B.C., found in Western Iran in 1934

394 coins, **3 from Cyprus**

Thompson-Mørkholm-Kraay, *Inventory of Greek Coin Hoards*, 1973, no. 1790, p. 256.

Ras Shamra (ancient Ugarit) 525-520 B.C., found in Syria in 1936

39 silver coins, **6 from Cyprus**

Schaeffer. *Mélange dussaud* 1. Paris 1939. pp. 461-487 illus.

Schlumberger. *L'argent grec*. p. 10 # 21

Kraay. *Numismatic Chronicle*, 1956. p. 48

Adana Hoard late 6th century B.C., found in Southern Anatolia ca. 1972

10 coins, **3 from Cyprus**

E.S.G. Robinson, "A Hoard of Greek coins from Southern Anatolia". *Revue Numismatique*, 1973, pp. 229-237.

Asia Minor, ca. 400 B.C., found in Western Anatolia before 1960.

24+ coins, **5 from Cyprus**

Thompson-Mørkholm-Kraay, *Inventory of Greek Coin Hoards*, 1973, no. 1199, p. 161.
Welz. *Schweizer Münzblätter*, 1962. pp. 1-15.

Cilicia Hoard, ca. 400 B.C., found in Southern Anatolia 1957.

1300+ coins, **16 from Cyprus**

Thompson-Mørkholm Kraay, *Inventory of Greek Coin Hoards*, 1973, no. 1255, p. 167.
Kraay. *Numismatic Chronicle*, 1962. pp. 1-15.

Cilicia Hoard, ca. 400 B.C., found in Southern Anatolia 1957.

83 coins, **2 from Cyprus**

Coin Hoards I, 1975, no. 21, p. 10.

Cilicia Hoard, ca. 375 B.C., found in Southern Anatolia 1966.

53 coins, **53 from Cyprus**

Coin Hoards II, 1976, no. 36, p. 17.

Cilicia Hoard, ca. 380 B.C., found in Southern Anatolia 1967.

100 coins, **50+ from Cyprus**

Thompson-Mørkholm-Kraay, *Inventory of Greek Coin Hoards*, 1973, no. 1260, p. 168.

Cilicia Hoard, ca. 375 B.C., found in Southern Anatolia 1947.

16 coins, **2 from Cyprus**

Thompson-Mørkholm-Kraay, *Inventory of Greek Coin Hoards*, 1973, no. 1261, p. 168.
Jenkins, *Numismatic Chronicle*, 19. p142.

Cilicia Hoard, ca. 380 B.C., found in Southern Anatolia before 1914.

89+ coins, **4 from Cyprus**

Thompson-Mørkholm-Kraay, *Inventory of Greek Coin Hoards*, 1973, no. 1259, p. 168.
Newell. *Numismatic Chronicle*, 1914. pp. 1-33.

Cilicia Hoard, ca. 370 B.C., found in Southern Anatolia 1901.

32 coins, **8 from Cyprus**

Thompson-Mørkholm-Kraay, *Inventory of Greek Coin Hoards*, 1973, no. 1252, p. 167.

Schlumberger. *L'argent grec*. p. 8 # 10

Kraay. NC 1969. p. 19f.

Cilicia Hoard, ca. 370 B.C., found in Southern Anatolia 1901.

145+ coins, **29 from Cyprus**

Thompson-Mørkholm-Kraay, *Inventory of Greek Coin Hoards*, 1973, no. 1263, p. 169.

Southern Asia Minor Hoard, ca. 430 B.C., found before 1912.

145 coins, **27 from Cyprus**

Thompson-Mørkholm-Kraay, *In Inventory of Greek Coin Hoards*, 1973, no. 1263, p. 169.

Southern Asia Minor Hoard, ca. 430 B.C., found before 1912.

32 coins, **12 from Cyprus**

Thompson-Mørkholm-Kraay, *In Inventory of Greek Coin Hoards*, 1973, no. 1252, p. 167.

Selimiye Hoard, ca. 400 B.C., found in Selimiye, Turkey 1922.

18 coins, **1 from Cyprus**

Thompson-Mørkholm-Kraay, *Inventory of Greek Coin Hoards*, 1973, no. 1254, p. 167.

Eastern Mediterranean Hoard late 6th century B.C., Southern Anatolia or Levant ca. 1990

66 coins, **28 from Cyprus**

J.H. Kagan, "An Archaic Greek Coin Hoard from the Eastern Mediterranean and Early Cypriot Coinage". *Numismatic Chronicle*, 1994, pp. 17-52.

Hauran Hoard, ca. 445 B.C., found in Jordan 1967.

113 coins, **21 from Cyprus**

Thompson-Mørkholm-Kraay, *Inventory of Greek Coin Hoards*, 1973, no. 1482, p. 202

Kraay-Moorey, *Revue Numismatique*, 1968, pp. 182ff.

Massyaf Hoard, ca. 445 B.C., found in Lebanon 1961.

100 coins, **4 from Cyprus**

Thompson-Mørkholm-Kraay, *Inventory of Greek Coin Hoards*, 1973, no. 1483, p. 203

Kraay-Moorey, *Revue Numismatique*, 1968, pp. 210-235.

Cabul Hoard, ca. 370 B.C., found in India 1933.

115+ coins, **6 from Cyprus**

Thompson-Mørkholm-Kraay, *Inventory of Greek Coin Hoards*, 1973, no. 1830, p. 265.

Schlumberger. *L'argent grec*. p. 3-6, 31-45.

Balkh Hoard ca. 390-380 B.C., found in Afghanistan ca. 1966

170+ coins, **4 from Cyprus**

Troxell-Spengler, *American Numismatic Society Museum Notes* 15 (1969), pp. 1-19.

Babylon Hoard, ca. 390 B.C., found in Mesopotamia before 1900.

23 coins, **2 from Cyprus**

Thompson-Mørkholm-Kraay, *Inventory of Greek Coin Hoards*, 1973, no. 1830, p. 265.

Schlumberger. *L'argent grec*. p. 3-6, 31-45.

Rhodes Hoard, ca. 450 B.C., found in Rhodes 1880.

41+ coins, **1 from Cyprus**

Thompson-Mørkholm-Kraay, *Inventory of Greek Coin Hoards*, 1973, no. 1830, p. 265.

Schlumberger. *L'argent grec*. p. 3-6, 31-45.

Black Sea, ca. 425 B.C., found in Turkey ca. 1970.

108 coins, **2 from Cyprus**

Coin Hoards I, 1975, no. 15, p. 7.

Ashmolean Report, 1970/1, p. 44ff.

Note: The hoard evidence listed above covers only recorded hoards from the earliest coinage to the conquest of Alexander the Great (a period of about 200 years). There is an extensive body of evidence for the coins from Cypriot mints appearing outside of the island during later periods of antiquity. For example, the second Demanhur Hoard of 1905 (Egypt), buried about 318 B.C., consisted of 8,000+ coins, 278 of which were minted in Cyprus. Also, in the Post Alexandrine period the range of find spots for Cypriot coins extends north and west to Greece and the Balkans.