



IN THE MATTER OF
A GRAND JURY INVESTIGATION
INTO A PRIVATE NEW YORK
ANTIQUITIES COLLECTOR

STATEMENT OF FACTS

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NEW YORK COUNTY

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In 2017, this Office initiated a criminal investigation into Michael Steinhardt's acquisition, possession, and sale of antiquities. The following Statement of Facts presents the evidentiary basis for the conclusion that 180 antiquities possessed by Steinhardt currently valued at approximately \$70 million, constitute stolen property under New York law. *See* Attachment A for a list of those stolen antiquities.

Background

For more than a decade, this Office has conducted extensive criminal investigations into international antiquities trafficking networks that plunder priceless cultural heritage and traffic antiquities into and through New York. To date, these investigations have uncovered criminal networks that specialize in pillaging the Middle East and North Africa (generally, Egypt, Iraq, Iran, Israel, Libya, Jordan, Lebanon, Syria, and Turkey); Southeast Asia (generally, Afghanistan, Cambodia, India, Indonesia, Myanmar, Nepal, Pakistan, Sri Lanka, and Thailand); Southern Europe (generally, Bulgaria, Greece, and Italy); and South and Central America (generally, Bolivia, Colombia, Mexico, and Peru). These investigations have resulted in the convictions of 11 traffickers and their co-conspirators; the indictment and pending extradition of another 6 traffickers; the seizure of more than 3600 antiquities valued at more than \$200 million. As a result, this Office has returned more than 1500 antiquities to the victims of this pillaging—two dozen countries and individuals—around the globe.

The criminal investigation into Steinhardt's acquisition, possession, and sale of

antiquities began obliquely.¹ In February 2017, while investigating a multi-million-dollar marble archaic bull's head (the “Bull’s Head”) stolen from the archaeological site of Eshmun in Lebanon during the Lebanese Civil War, this Office determined that the Bull’s Head had been purchased by Steinhardt who subsequently loaned it to the Metropolitan Museum of Art (the “Met”). This Office then applied for and received a search warrant authorized by Judge Daniel P. FitzGerald on July 6, 2017, to seize the Bull’s Head from the Met. *See* Exhibit 1 for a photograph of the Bull’s Head. This same investigation next uncovered that Steinhardt also possessed a second multi-million-dollar antiquity that had been looted from the same site of Eshmun during the same civil war: a marble archaic torso (the “Calf Bearer”). Accordingly, on October 11, 2017, this Office applied for and received another warrant from Judge FitzGerald, this time for the Calf Bearer at Steinhardt’s Fifth-Avenue New York City apartment. *See* Exhibit 2 for a photograph of the Calf Bearer. On December 15, 2017, both the Bull’s Head and the Calf Bearer were repatriated to Lebanon.

Over the course of this investigation, this Office learned that Steinhardt possessed additional looted antiquities at his apartment and at his Midtown-Manhattan office. As a result, this Office initiated a criminal investigation into Steinhardt’s acquisition, possession, and sale of antiquities in multiple locations in New York. Ultimately, pursuant to New York Criminal Procedure Law §690.10, this investigation applied for and received 15 additional judicially

¹This Statement of Facts will not list all the law-enforcement agents, governmental officials, non-governmental organizations, legal experts, academic professionals, archaeologists, civilian witnesses, and confidential informants who assisted, participated in, or provided information to this investigation. In those limited occasions where names are omitted or redacted, that was either due to concerns for the safety of the individual following public-disclosure or because that individual continues to be a confidential source of information. But even a partial list offers some idea of the breadth and scope of the investigation. *See* Attachment B for the partial list.

authorized search warrants to seize antiquities, documents, computers, and other devices from Steinhardt. One of the search warrants also authorized the photographing and video-recording of each antiquity in Steinhardt's apartment and office by Homeland Security Investigations (HSI) Special Agents and members of this Office's Video Unit. Thereafter, and pursuant to judicially authorized sharing orders, this Office began joint investigations with law-enforcement authorities in 11 countries: Bulgaria, Egypt, Greece, Iraq, Israel, Italy, Jordan, Lebanon, Libya, Syria, and Turkey. These investigations determined that since at least 1987 Steinhardt has been acquiring and selling antiquities, totaling more than 1000 antiquities valued at more than \$200 million at the time of their purchase and doubling in value since.

Of these acquisitions, this Office developed compelling evidence that 180 were stolen from their country of origin. As will be discussed separately, none of these 180 antiquities had any specific provenance that could be verified by this Office. For the remainder of Steinhardt's acquisitions—of which only 7.3% had any specific provenance that could be verified by this Office—this criminal investigation did not uncover sufficient evidence to warrant seizure, i.e., probable cause that the antiquities constitute stolen property under New York State criminal law. As a law-enforcement agency, this Office does not have the authority to declare antiquities or other objects of cultural heritage to be either legally possessed or authentic—merely that there is (or is not) sufficient evidence to warrant seizure.

Laws pertaining to grand-jury secrecy preclude the disclosure of the full scope of the investigation or attendant grand-jury proceedings for each of the 180 antiquities, particularly concerning the identities of the various witnesses and informants who provided evidence to this investigation. Pursuant to an Order of the New York County Supreme Court, however, a

summary of the results of this investigation may be released. Moreover, where members of this Office conducted interviews and analyzed evidence outside of the grand-jury process, we may legally share much of the substance of the investigation. This is done largely because of the strong public interest in the transparency of the criminal-justice process. It is, after all, an axiom of jurisprudence “that justice should not only be done, but should manifestly and undoubtedly be seen to be done.” *R v. Sussex Justices, ex parte McCarthy*, 1 KB 256, 259 (1924).

Such limited disclosure also offers insight into the following: a) the factors involved in determining whether an antiquity constitutes stolen property under New York State criminal law; b) the sheer volume of stolen antiquities currently in New York as a result of having been trafficked in the past by international trafficking networks; c) the scope of international antiquities trafficking networks that are still active; and d) the current efforts of law-enforcement agencies around the globe to combat the historically under-investigated and under-prosecuted crime of the pillaging of cultural heritage and subsequent trafficking of the stolen antiquities. Finally, because this investigation uncovered criminality in multiple jurisdictions, it is incumbent on this Office to share the results with our international partners so they may act pursuant to their official duties in their respective jurisdictions.

The entire criminal investigation was conducted within a strict legal framework and was driven solely by the evidence developed within this framework. Thus, what follows is in two-parts: first, a summary of the legal framework applicable to the investigation and prosecution of all antiquities cases in New York County generally; and, second, a summary of the results of this investigation within that legal framework.

Legal Framework

Provided this Office possesses the requisite jurisdiction and a founded basis to believe there is a violation of New York State criminal law, the Antiquities Trafficking Unit investigates the trade in stolen antiquities and prosecutes offenders. Under New York law, any object (antiquity or otherwise) constitutes stolen property whenever anyone “wrongfully takes, obtains, or withholds such property from an owner thereof.” N.Y. Penal Law §155.00(1). This statutory language differs from civil law in many respects. But three bear noting here: the definition of “owner,” the limited relevance of “good faith,” and the inapplicability of the statute of limitations.

First, under New York State criminal law, an “owner” is defined as “any person who has a right to possession thereof superior to that of the taker.” N.Y. Penal Law §155.00(5). Additionally, and unique to antiquities, whenever the country of origin has a clear pronouncement of patrimony—i.e., a legal declaration of national ownership of all cultural heritage discovered after the enactment of that law—then that country is the “owner.” In such cases, “it does not matter that the antiquities...were stolen in a foreign country, or that their putative owner is a foreign entity.” *U.S. v. Frederick Schultz*, 333 F.3d 393, 402-3 (2d Cir. 2003). After all, there is “no reason that property stolen from a foreign sovereign should be treated any differently from property stolen from a foreign museum or private home.” *Id.* at 410.

Second, it is a bedrock of our criminal law that “once stolen, always stolen.” In other words, a thief (or a looter) can never legally acquire good title in New York or pass on good title to anyone else. Thus, although a good-faith purchaser may lack the necessary intent and therefore not be criminally liable for the possession of the stolen property, a good-faith

purchase does not render a stolen antiquity legal. Once an antiquity is proven to have been stolen, therefore, and regardless of when or where it was stolen, it can be legally seized and returned to the legal owner.

Finally, under New York State criminal law, it does not matter how much time has elapsed since the theft. Generally, a criminal action for a felony involving stolen property in New York must commence within five years from the date of the crime. N.Y. Criminal Procedure Law §30.10. The crime of criminal possession of stolen property, however, constitutes what the law refers to as a “continuing crime,” continuing as long as the stolen object is possessed by anyone other than the legal owner. For the crime of criminal possession of stolen property, therefore, the five-year clock under the statute of limitations does not begin running until the stolen property is no longer being possessed—be it by law-enforcement seizure, sale, or transfer. This is why the equitable defense of laches, i.e., that a long delay in asserting a claim has prejudiced the adverse party—often raised in civil cases—does not apply in a criminal case. *See, e.g., U.S. v. Batson*, 608 F.3d 630, 633 (9th Cir. 2010) (“Like the Second Circuit, ‘[w]e have found no case applying a laches defense in the criminal context.’” quoting *U.S. v. Milstein*, 401 F.3d 53, 63 n.3 (2d Cir. 2005)). Thus, provided an antiquity has been possessed in New York County within the last five years and there is probable cause that the property is stolen, this Office may seize such property and prosecute criminally culpable offenders. And we may do so regardless of whether the date of theft itself lies outside the applicable statute of limitations.

These protections are neither new nor unique to antiquities. New York State law has always, “protected the right of the owner whose property has been stolen to recover that

property, even if it's in the possession of a good-faith purchaser for value.” *Solomon R. Guggenheim Foundation v. Lubell*, 77 N.Y. 2d 311, 317 (1991). But the ability to recover stolen antiquities and prosecute the looters, smugglers, traffickers, dealers, and collectors depends in part on the manner of the theft.

Generally, thefts involving stolen antiquities fall into two categories depending on whether the antiquities were (or were not) documented, i.e., photographed or otherwise recorded, prior to their theft. The first category—documented thefts—includes antiquities stolen from museums, private homes, etc. This category of theft is proven as in any theft case, e.g., by witness observations, reports describing the antiquity, or a photograph of the object before its theft. The second category is that of thefts of undocumented antiquities, i.e., those antiquities that were clandestinely looted from the ground and never photographed or recorded before being smuggled out of the country of origin. In such cases, the law does not require direct evidence of the precise timing and location of a theft to prove an object constitutes stolen property. Notably, and as will be addressed more fully separately, an antiquity is not necessarily legal simply because its claimed provenance pre-dates the enactment of its origin country’s declaration of national ownership of its antiquities, i.e., its patrimony law. In other words, the enactment of a country’s patrimony law does not immunize from prosecution thefts that occurred prior to that date.

Circumstantial Evidence of Theft

To prove a suspected crime, all investigations and prosecutions—whether for antiquities trafficking or murder—may also rely on circumstantial evidence. Indeed, New York State criminal law draws no distinction between the weight or importance of direct versus

circumstantial evidence in proving a crime.

The use of circumstantial evidence in proving an antiquity has been looted emerges in ways as varied as the ways in which antiquities are looted. But the most important piece of circumstantial evidence, and certainly the one with which investigations frequently start, is whether the object has any verifiable prior provenance. After all, it is well-known that legal antiquities, especially historically significant or aesthetically striking antiquities, rarely appear on the international art market without any verifiable prior provenance. The sudden appearance of an unprovenanced antiquity on the international art market, therefore, is often an indication that it has been looted. Prior to their appearance on the international art market, not one of the 180 Seized Antiquities had any provenance that could be verified by this Office.

Such unprovenanced antiquities always warrant additional scrutiny from law-enforcement officials (and increased diligence from purchasers). Standing alone, the absence of provenance does not necessarily mean an antiquity is illegal. But, when taken together with other evidence, to include, among others, any of the following nine factors, such evidence is always material, usually probative, and often dispositive. That is especially true when, as here, many of the Seized Antiquities presented evidence of multiple factors.

1) Known and Convicted Traffickers. It is well-documented that traffickers of stolen antiquities accumulate, launder, and “fence” material supplied by multiple local looters or *tombaroli* (tomb raiders). When an unprovenanced antiquity first surfaces on the international art market in the possession of a known or convicted trafficker, therefore, it is often an indication that it has been looted. This Office developed evidence that, prior to Steinhardt’s purchase, 171 of the 180 Seized Antiquities first surfaced in the possession of individuals who

law-enforcement authorities later determined to be antiquities traffickers—some of whom have been convicted of antiquities trafficking.

2) Photographs. It is well-documented that looters and traffickers often take and maintain photographs of an antiquity in its post-looting state to demonstrate the antiquity's authenticity to potential buyers in the future. The traffickers' oft-repeated refrain is that if it is dirty, it is real. Thus, during raids, seizures, and arrests, law-enforcement authorities often recover photographs of recently looted and still-dirty antiquities. This Office has many thousands of such photographs. In addition to the evidence provided by the condition of the dirty (or unrestored) antiquity in such photographs, the manner in which the photograph was taken is probative. Digital photographs, for example, contain "metadata"—information indicating when and where the photograph was taken, often proving the timing and location of the looting. Polaroid photographs are also probative of timing. Although black-and-white Polaroid film was commercially available in 1950, peel-apart color prints were not released until 1963 and non-peel-apart color prints were not available until 1972. Thus, a dirty (or unrestored) photograph of an antiquity is an indication it is looted, and the manner of photography illustrates when the antiquity was photographed in its post-looting condition. This Office developed evidence that of the 180 Seized Antiquities, 101 first appeared dirty (or unrestored) in photographs. Of those 101 objects, Steinhardt's files contained dirty (or unrestored) photographs of 41.

3) Dirt. In scientific and legally authorized excavations, recovered antiquities are thoroughly cleaned following their discovery. Thus, independent of the existence of a photograph of a dirty, or unrestored, antiquity in its post-looting condition, the presence of

dirt or encrustations on an unprovenanced antiquity is often an indication that it has been looted. This Office developed evidence that of the 180 Seized Antiquities, 100 appeared covered in dirt or encrustations prior to Steinhardt's purchase. Of those 100 objects, Steinhardt's files contained some evidence (photographs, conservation reports, correspondence, etc.) that 45 of them had dirt or encrustations at the time of Steinhardt's purchase.

4) Find Spot. Unless an antiquity was discovered pursuant to a scientific and legally authorized excavation, detailed knowledge about that antiquity's "find spot" and how it was found can only be possessed by the looter. It is well-known, therefore, that information from a seller identifying the find spot of an unprovenanced antiquity is often an indication that it has been looted. This Office developed evidence that of the 180 Seized Antiquities, 42 were purchased by Steinhardt with accompanying information about the specific place that antiquity was found and how it was discovered.

5) Orphans. Looters and smugglers often intentionally break large statues into smaller pieces (called "*orfanelli*" or "orphans") to ease transport and avoid detection by customs and other law-enforcement officials. When an unprovenanced statute appears in fragments that are easily fixable (neck, elbow, knee, etc.), therefore, it is often an indication that it has been looted. This Office developed evidence that of the 180 Seized Antiquities, 6 had been in such fragments prior to Steinhardt's purchase.

6) Civil Unrest and War. It is a well-documented that looting of antiquities increases during times of civil unrest and war. When an unprovenanced antiquity appears on the international art market for the first time immediately after geo-political turbulence in its

country of origin, therefore, that is often an indication that it has been looted. This Office developed evidence that of the 180 Seized Antiquities, 9 originated in countries with rampant looting amid civil unrest or war immediately predating Steinhardt's purchase.

7) Confirmed and Specific Looting. Even absent civil unrest and war, specific regions or areas are often the subject of targeted looting due to insufficient security, active scientific excavations temporarily shutting down for the season, or increased demand for a recently discovered object. The sudden appearance of an unprovenanced antiquity (or group of antiquities) on the international art market for the first time after reports of looting of that specific type of antiquity from the area in which its type originated, therefore, is often an indication that it has been looted. This Office developed evidence that of the 180 Seized Antiquities, 20 first appeared on the international art market shortly after reports of looting of that specific type of antiquity or of a specific region prior to Steinhardt's purchase.

8) Hoard. Within the archaeological community, a "hoard" (a series of objects buried together in antiquity) is extensively studied for its sociological and anthropological insights into ancient cultures. Thus, the discovery of a hoard is heavily reported and widely published. The sudden appearance on the international art market of an unprovenanced hoard, therefore, is often an indication that the objects have been recently looted. This Office developed evidence that of the 180 Seized Antiquities, 64 were in a 'hoard' at the time of Steinhardt's purchase.

9) False or Opaque Provenance. Because the appearance of an unprovenanced antiquity on the international art market is often an indication that it has been looted, dealers and auction houses frequently mask this absence of ownership history with generic phrases

such as “ex private Swiss collection” or “from a private U.S. collection.” Dealers and auction houses claim they do so to protect the anonymity of the seller or prevent buyers from circumventing the middleman’s commission. In fact, it is well-documented that such vapid and unverifiable provenance is simply a facile attempt to avoid arousing the suspicion of law-enforcement authorities and others. This Office developed evidence that of the 180 Seized Antiquities, 50 were sold to Steinhardt using fabricated provenance that concealed their true ownership history.

The Stolen Antiquities

Within this legal framework, this Office’s criminal investigation into Steinhardt’s acquisition, possession, and sale of antiquities determined that the 180 Seized Antiquities, for which Steinhardt paid more than \$26 million, constitute stolen property under New York law. These 180 Seized Antiquities, which are currently valued at approximately \$70 million, were looted and illegally smuggled out of 11 different countries prior to their sale to Steinhardt: Bulgaria (1 antiquity); Egypt (9 antiquities); Greece (47 antiquities); Iraq (2 antiquities); Israel (40 antiquities); Italy (51 antiquities); Jordan (9 antiquities); Lebanon (2 antiquities); Libya (1 antiquity); Syria (4 antiquities); and Turkey (14 antiquities).

Prior to Steinhardt’s acquisition, 169 of the 180 Seized Antiquities were trafficked by a total of 12 different criminal smuggling networks controlled by the following individuals: Giacomo Medici (24 antiquities); Giovanni Franco Becchina (11 antiquities); Edoardo Almagià (10 antiquities); Robin Symes (10 antiquities); Robert Hecht (45 antiquities); Eugene Alexander (7 antiquities); Fritz and Harry Bürki (1 antiquity); Gil Chaya (30 antiquities); Rafi Brown (28 antiquities); Pasquale Camera (1 antiquity); George Ortiz (1 antiquity); and Noriyoshi Horiuchi

(1 antiquity). The remaining 11 of the 180 Seized Antiquities first appeared on the international art market in the hands of the following dealers shortly after civil unrest, war, or reports of rampant looting in each antiquity's country or origin: Robin Symes (2 antiquities from Lebanon); Merrin Gallery (4 antiquities from Syria and Turkey); Robert Haber and Associates Ancient Art (2 antiquities from Italy and Turkey); Ward & Co. (1 antiquity from Libya); Svyatoslav Konkin (1 antiquity from Iraq); and Axel G. Weber Kunsthandel (1 antiquity from Bulgaria).

Since the proof of theft is generally similar for each of the antiquities trafficked within its respective network or by its respective dealer, this Statement of Facts will address the antiquities thematically by network and dealer rather than chronologically by theft or seizure.

Giacomo Medici (24 antiquities)

Giacomo Medici (b. 1938) was born outside Rome, Italy, and began trafficking antiquities in the early-1960s. For over forty years, Medici led a highly lucrative criminal enterprise using gangs of *tombaroli* to loot carefully chosen and insufficiently guarded archaeological sites throughout Italy (generally Lazio, Campania, Basilicata, Apulia, and Calabria) and Greece (generally on Paros, Crete, and areas of the mainland). He then sold the stolen material through dealers and auction houses to private collectors and museums. In the 1980s, Medici began selling these looted antiquities directly from the Geneva Freeport in Switzerland. Before long, the Geneva warehouses became Medici's primary base of operations, his de facto showroom where he would invite buyers from all over the world—other dealers, collectors, and even curators of U.S.-based museums—and offer them antiquities stolen from Italy and Greece.

On September 13, 1995, Italian and Swiss authorities raided Medici's offices and

warehouse in Geneva, recovering approximately 3,800 antiquities, as well as a series of folders and binders containing thousands of documents and Polaroid photographs. Referred to as the “Medici Archive,” the material totaled approximately 35,000 documents and 4,000 photographs. The carefully arranged photographs included Polaroids taken at the site of the looting with the dirt still on the artifacts, photographs of the objects wrapped in Italian newspapers or blankets, and professional-quality photographs of the objects post-restoration.

On January 17, 1997, Medici was arrested in Italy and charged with receiving stolen goods, illegally exporting goods, and conspiring to traffic goods. In 2004, Medici was convicted in Italy of being the promoter and organizer of an international criminal association that trafficked thousands of looted artifacts. The judge found that more than 95% of Medici’s antiquities—both those found in his Geneva warehouse as well as those depicted in the 4,000 seized photographs—were looted from Italy. Therefore, concerning the 3,800 antiquities recovered from the Geneva warehouse, the judge ordered the confiscation of approximately 3,400. Of the 400 that were not confiscated, 258 were returned to Switzerland: 179 because they had been looted in Greece, from sites on Paros, Crete, and the mainland (and, therefore, were not subject to Italian law), and 79 because they were not authentic (and, therefore, were not the subject of the criminal investigation). For fewer than 150 of the 3,800 hundred antiquities—3.9% of his collection—did Medici provide any prior provenance. (Even those were forfeited to Italy to pay for the court-ordered sanctions.) As for the thousands of antiquities depicted in the photographs, however, the judge did not order their confiscation because they had not yet been examined. But the judge held that any of the antiquities depicted in those seized photographs that were thereafter located—and thereafter proven to be authentic and of Italian origin—were to be confiscated as

stolen.

Medici was sentenced to 10 years in prison and fined €10 million (approximately \$12 million). In 2009, the Italian Appellate Court affirmed the convictions for receiving stolen goods and conspiracy, but dismissed the trafficking count due to the running of the statute of limitations. Medici's sentence was reduced to eight years of imprisonment. In December 2011, Medici's final appeal was rejected.

The 83-year-old Medici remains at large in Italy. To date, this Office has executed 19 seizures of 44 antiquities trafficked by Medici.

Sardinian Idol

The Sardinian Idol appears in a photograph recovered from the Medici Archive, depicting the antiquity cleanly broken into six pieces. *See* Exhibit 3A. The appearance of the Sardinian Idol in a looting photograph from Medici's Archive is dispositive of the Idol's illegality. Its condition is equally and independently dispositive because it is well-known within the law-enforcement and archaeological communities that antiquities are often intentionally broken into smaller more easily transportable pieces ("*orfanelli*") to facilitate their smuggling prior to restoration. The Sardinian Idol was crafted by the Ozieri Culture, an ancient Neolithic civilization in Sardinia, between 2500-2000 B.C.E. The object first appeared on the international art market in 1989, in the hands of Robin Symes—as will be discussed separately, Symes is a notorious London-based dealer who acted as the front-man for traffickers Medici and Becchina and who has continued to face criminal investigations in multiple jurisdictions.

In 1989, Symes sold the Idol (through his shell corporation Xoilan Trader Inc. and with no prior provenance) to New York-based Harmon Fine Arts for \$480,000. In 1990,

Harmon Fine Arts sold the Idol to another New York-based dealer, the Merrin Gallery, then-owned by Edward and currently-owned by his son, Samuel Merrin. Edward Merrin's conviction for fraudulently inflating the prices of antiquities and the many seizures by this Office of antiquities that were trafficked through the Merrin Gallery will be discussed in detail separately. In 1993, Merrin Gallery sold the Sardinian Idol to Steinhardt for \$675,000. In 2014, Steinhardt tried to consign the object to Christie's, and in 2015, Steinhardt tried to consign it to Merrin Gallery for more than \$1 million. Neither consignment was successful. *See* Exhibit 3B for the most recent photograph of the Sardinian Idol. No verifiable provenance for the Sardinian Idol prior to the 1989 sale by Symes to Harmon Fine Arts has ever been identified.

Togate Figure

The Togate Figure (a robed male figure) appears in multiple Polaroid photographs recovered from the Medici Archive, depicting the object broken and dirt-encrusted next to a second togate statue atop of an Italian newspaper. *See* Exhibit 4A. Because antiquities are cleaned during scientific and legally authorized investigations, the presence of dirt on an antiquity is an indicator of its illicit origin. Further, the crumpled Italian newspaper is equally probative of the recent illicit excavation of the object. Featuring an Etruscan inscription along its base, the Togate Figure was crafted between 300 to 100 B.C.E. in Perugia, a city whose archaeological sites suffered extensive looting by Medici's *tombaroli* during the 1990s. Indeed, when Phoenix Ancient Art sold the object to Steinhardt for \$800,000 on June 16, 1993, the invoice to Steinhardt noted that the Togate Figure was from "Perusia [sic], Umbria, Italy." Following Steinhardt's consignment of the object back to Phoenix Ancient Art for sale, this Office applied for and received a warrant to seize the Togate Figure. *See* Exhibit 4B for the

most recent photograph of the Togate Figure. No verifiable provenance for the Togate Figure prior to the 1993 sale by Phoenix Ancient Art to Steinhardt has ever been identified.

Eos Carrying Cephalus

The Eos Carrying Cephalus dates to 600 B.C.E., and depicts a pair of embracing figures etched in amber. The Eos Carrying Cephalus appears on the same June 16, 1993, invoice from Phoenix Ancient Art as the Togate Figure. Described as from “South Italy,” the Eos Carrying Cephalus was later observed to have “dirt or soil accumulation” on its surface when it was examined by a conservator employed by Steinhardt. In scientific and legally authorized excavations, discovered antiquities are cleaned. Therefore, the presence of loose dirt on this antiquity clearly indicates its illegal excavation. Moreover, although no Medici Archive photograph has been recovered for the Eos Carrying Cephalus, it appears on the same June 16, 1993, invoice as the Togate Figure, was covered in dirt, and originated from the same region—South Italy—where Medici’s *tombaroli* specialized in looting sites. Steinhardt purchased the Eos Carrying Cephalus from Phoenix Ancient Art with no prior provenance on June 16, 1993, for \$100,000. *See* Exhibit 5 for the most recent photograph of the Eos Carrying Cephalus. No verifiable provenance for the Eos Carrying Cephalus prior to the 1993 sale by Phoenix Ancient Art to Steinhardt has ever been identified.

Bronze Pegasus (2)

This pair of Bronze Pegasus (the “Bronze Pegasus”) appear cracked and covered in oxidation and dirt, in a photograph recovered from the Medici Archive. *See* Exhibit 6A. The Bronze Pegasus were produced in Italy between 600-500 B.C.E. at the ancient site of Vulci, an Etruscan necropolis well-known for its fine bronzes. The Bronze Pegasus first surfaced on

the international art market in 1993, when Robin Symes sold the pair to William and Linda Beierwaltes, Colorado-based art collectors who had also once owned the (previously discussed) Symes-trafficked Bull's Head and the Calf Bearer, both of which had been looted during Lebanon's 1979 Civil War and then repatriated by this Office in 2017. In 2017, Swiss law-enforcement authorities in Geneva seized approximately 12,000 antiquities owned by the Beierwaltes. A portion of these antiquities remain under seizure in Switzerland as part of an ongoing investigation into the illegal trafficking of cultural property. In October 20, 2020, the U.S. Court of Appeals for the Second Circuit affirmed a dismissal of the Beierwaltes suit against Swiss authorities regarding the seizure. In 2006, the Beierwaltes consigned their entire antiquities collection, to include the restored pair, to Phoenix Ancient Art. In 2012, Steinhardt purchased the Bronze Pegasus from Phoenix Ancient Art for \$400,000. A photograph of the antiquities taken in Steinhardt's Apartment depict the pair cleaned, restored, and on a set of stands. *See* Exhibit 6B for the most recent photograph of the Bronze Pegasus. No verifiable provenance for the Bronze Pegasus prior to the 1993 sale from Symes to the Beierwaltes has ever been identified.

Villanova Helmet

The Villanova Helmet, crafted in Italy circa 900-700 B.C.E., appears in a photograph recovered from the Medici Archive, depicting the object covered in dirt with loose earth at its base. *See* Exhibit 7A. The Villanova Helmet first surfaced on the international art market in 1994, when Steinhardt purchased the Villanova Helmet from Phoenix Ancient Art with no prior provenance for \$180,000. Steinhardt has never produced any records for the sale, but according to Phoenix Ancient Art's records, Steinhardt purchased the Villanova Helmet for

\$180,000. *See* Exhibit 7B for the most recent photograph of the Villanova Helmet. No verifiable provenance for the Villanova Helmet prior to the 1994 sale from Phoenix Ancient Art to Steinhardt has ever been identified.

Terracotta Panels (2)

The Terracotta Panels appear in a photograph recovered from the Medici Archive, depicting the panels cracked into numerous fragments, covered in dirt, with jagged corners where they appear to have been removed from a wall. *See* Exhibit 8A. Crafted in Italy around 600 B.C.E. from terracotta characteristic of Etruscan art, the antiquities are similar to panels recovered in and around the heavily-looted archaeological site of Cerveteri. In 1993, Symes sold the Terracotta Panels to the Beierwaltes. In 1998, the Terracotta Panels were displayed in a *House & Garden* feature on the Beierwaltes' Colorado home. This *House & Garden* article also led to the Office's previously discussed 2017 seizure of the Calf Bearer from Steinhardt. In 2006, the Beierwaltes consigned their entire antiquities collection, to include the restored Terracotta Panels, to Phoenix Ancient Art. In 2014, Steinhardt purchased the Terracotta Panels from Phoenix for \$435,000. *See* Exhibit 8B for the most recent photograph of the Terracotta Panels. No verifiable provenance for the Terracotta Panels prior to the 1993 sale from Symes to the Beierwaltes has ever been identified.

Sphinx Kylix

The Sphinx Kylix appears in two photographs recovered from the Medici Archive, depicting the object from both its side and from above with light chips and scratches. *See* Exhibit 9A. Signed on its handles by a Greek artist – “Tleson, the son of Nearchos” – the Sphinx Kylix was looted from an Etruscan tomb in Italy. Dated 550-525 B.C.E., the Sphinx

Kylix depicts the mythical human-headed figure with a body of a lion. The Sphinx Kylix first surfaced on the international art market on January 8, 1996, when Robin Symes sold the object to the Beierwaltes. In 2006, the Beierwaltes consigned their entire antiquities collection, to include the restored Sphinx Kylix, to Phoenix Ancient Art. In 2007, Steinhardt purchased the Sphinx Kylix from Phoenix Ancient Art for \$310,000. *See* Exhibit 9B for the most recent photograph of the Sphinx Kylix. Although Phoenix Ancient Art provided a warranty that it had “the right to sell” the object, no verifiable provenance for the Sphinx Kylix prior its 1996 sale from Symes to the Beierwaltes has ever been identified.

Berlin Painter Oinochoe

The Berlin Painter Oinochoe appears before a teal-blue background in a photograph recovered from the Medici Archive. *See* Exhibit 10A. A red-figure oinochoe attributed to the “Berlin Painter,” the antiquity dates to 490-480 B.C.E., and is characteristic of grave goods found in Etruscan tombs in Italy. The Berlin Painter Oinochoe first surfaced on the international art market in 1996, when Steinhardt purportedly purchased the Berlin Painter Oinochoe from Harry Bürki with no prior provenance for \$215,000. As will be discussed separately and in detail, Harry Bürki along with his father, Fritz, were Zurich-based restorers who worked for Medici and other Italian antiquities traffickers. On October 9, 2001, Swiss and Italian authorities raided the Bürkis’ workshop seizing documents, photographs, and 132 Italian antiquities that had been illegally smuggled into Switzerland. In a sworn deposition to Swiss authorities taken that same day, Fritz Bürki admitted that he knew that most of the objects he had been asked to restore were illegal, and often offered his family’s name to generate provenance for the antiquities. Although the invoice for the Berlin Painter Oinochoe states it

came from Bürki, Steinhardt's records reflect that the real seller of the object was the American-born trafficker Robert Hecht. As will be discussed in detail separately, Hecht—who (like Symes) often acted as the front-man for traffickers Medici and Becchina—was expelled from both Turkey and Italy for his notorious antiquities trafficking. Numerous records for the Berlin Painter Oinochoe and other Steinhardt antiquities reflect that Hecht and Bürki often jointly sold antiquities to utilize the faux-Bürki provenance. Here, Bürki falsely claimed on his invoice to Steinhardt that the Berlin Painter Oinochoe was “exported legally from its country of origin.” *See* Exhibit 10B for the most recent photograph of the Berlin Painter Oinochoe. No verifiable provenance for the Berlin Painter Oinochoe prior to the 1996 sale from Bürki/Hecht to Steinhardt has ever been identified.

Leagros Hydria

The Leagros Hydria appears atop a crocheted fabric in a photograph recovered from the Medici Archive. *See* Exhibit 11A. Depicting Herakles draped in a lion skin and the blood-thirsty Kykonos, the Leagros Hydria dates to 510 B.C.E., and was looted from an Etruscan tomb in Italy. The Leagros Hydria first surfaced on the international art market in 1987 in the possession of Christos Bastis, a Greek restaurateur and antiquities enthusiast, who displayed the Leagros Hydria at a 1987 Met exhibition featuring the highlights of his collection. Following Bastis's death in 1999, Steinhardt purchased the Leagros Hydria from Michael Ward, a New York-based gallery owner, for \$127,000 in 2000. Ward's involvement in the antiquities trade will be discussed in detail separately. *See* Exhibit 11B for the most recent photograph of the Leagros Hydria. No verifiable provenance for the Leagros Hydria prior to the 1987 Christos Bastis exhibition at the Met has ever been identified.

Musée de l'Art et d'Histoire and The Getty Museum

It is well-documented that Medici, Becchina, Symes, and other traffickers often laundered their looted antiquities through exhibitions at museums in order to manufacture “provenance.” The ability to provide prospective buyers a thin veneer of respectability by means of an antiquity’s appearance in a glossy catalogue increased the marketability and, therefore, the price of such unprovenanced antiquities. According to the evidence presented at both the Becchina and Medici trials, one of the most culpable offenders who helped launder looted antiquities was Jacques Chamay, the now-disgraced, former curator of Geneva’s Musée de l’Art et d’Histoire that was conveniently located near the warehouses where Medici stored his looted antiquities. At the Medici trial, the Italian judge found that Chamay had helped launder many dozens of looted antiquities by exhibiting them at his museum with false provenance: “in his mendacious declaration, Chamay acting with malice invented provenance.” Not surprisingly, then, among the Medici-trafficked antiquities seized from Steinhardt, six had their first appearance on the international art market in an exhibition at Geneva’s Musée de l’Art et d’Histoire from 1978-1981. All six—in addition to a seventh Medici-looted antiquity—were then exhibited at the Getty Museum in Los Angeles, California. None of those antiquities had any provenance prior to the staged exhibitions. As detailed below, Steinhardt purchased all seven.

Antimenes Hydria

The Antimenes Hydria appears atop a teal-blue square in a photograph recovered from the Medici Archive. *See* Exhibit 12A. Crafted circa 515-510 B.C.E., and from the Etruscan site of Cerveteri in Italy that had been extensively looted by Medici and his *tombaroli*, the Antimenes

Hydria first surfaced on the international art market in 1983 when Robin Symes advertised the Antimenes Hydria for sale. By 1987, Symes had transferred the object to the New York-based Atlantis Gallery, part-owned by Robert Hecht, who then loaned it to the Getty Museum. From 1987-1996, the object was on view at the Getty Museum prior to its sale to Steinhardt through Sotheby's New York on December 17, 1996. It is well-documented that Medici-trafficked antiquities often were laundered through auction houses such as Sotheby's and Christie's—by virtue of strawman sales (in which the seller and the buyer are the same person). In this case, Steinhardt purchased the Symes-Hecht-trafficked Antimenes Hydria through Sotheby's New York in 1996 for \$169,411. *See* Exhibit 12B for the most recent photograph of the Antimenes Hydria. No verifiable provenance for the Antimenes Hydria prior to its 1983 advertisement by Symes has ever been identified.

Attic African Head Aryballos

The Attic African Head Aryballos appears resting on a linen fabric in a photograph recovered from the Medici Archive. *See* Exhibit 13A. Featuring distinctive spots of paints between the lips and above the ear, the Attic African Head Aryballos dates to 500-400 B.C.E., and was looted from an Etruscan necropolis in Italy. It first surfaced on the international art market when it was displayed at the Musée de l'Art et d'Histoire in Geneva from 1978-1981 and then at the Getty Museum from 1984-1996. Then, in 1996, Symes sold the Attic African Head Aryballos to the Beierwaltes. In 2006, the Beierwaltes consigned their entire antiquities collection, to include the restored Head, to Phoenix Ancient Art. In 2009, Steinhardt purchased the Head from Phoenix Ancient Art for \$163,312.50. *See* Exhibit 13B for the most recent photograph of the Attic African Head Aryballos. Although Phoenix Ancient Art

provided a warranty that it had “the right to sell” the object, no verifiable provenance for the Attic African Aryballos prior to the 1978 Musée de l’Art et d’Histoire exhibition has ever been identified.

Proto-Corinthian Duck

The Proto-Corinthian Duck appears on a linen fabric in a photograph recovered from the Medici Archive. *See* Exhibit 14A. Dating to 650-625 B.C.E., the Proto-Corinthian Duck depicts a duck with its head facing backward, and was looted from an Etruscan tomb in Italy. It first surfaced on the international art market when it was displayed at the Musée de l’Art et d’Histoire in Geneva from 1978-1981 and then at the Getty Museum from 1984-1996. On June 12, 1996, Symes sold the Proto-Corinthian Duck to the Beierwaltes for \$120,000. In 2006, the Beierwaltes consigned their entire collection, to include the Proto-Corinthian Duck, to Phoenix Ancient Art. In 2009, Steinhardt purchased the Proto-Corinthian Duck from Phoenix Ancient Art for \$130,000. *See* Exhibit 14B for the most recent photograph of the Proto-Corinthian Duck. Although Phoenix Ancient Art provided a warranty that it had “the right to sell” the object, no verifiable provenance for the Proto-Corinthian Duck prior to the 1978 Musée de l’Art et d’Histoire exhibition has ever been identified.

Proto-Corinthian Owl

The Proto-Corinthian Owl appears on a linen fabric in a photograph recovered from the Medici Archive. *See* Exhibit 15A. Dating to circa 650-625 B.C.E., the Proto-Corinthian Owl was looted from an Etruscan tomb in Central Italy. The Proto-Corinthian Owl first surfaced on the international art market when it was displayed at the Musée de l’Art et d’Histoire in Geneva from 1978-1981 and then at the Getty Museum from 1984-1996. On

June 12, 1996, Symes sold the Proto-Corinthian Owl to the Beierwaltes for \$150,000. In 2006, the Beierwaltes consigned their entire antiquities collection, to include the Proto-Corinthian Owl, to Phoenix Ancient Art. In 2009, Steinhardt purchased the object from Phoenix Ancient Art for \$120,000. *See* Exhibit 15B for the most recent photograph of the Proto-Corinthian Owl. Although Phoenix Ancient Art provided a warranty that it had “the right to sell” the object, no verifiable provenance for the Proto-Corinthian Owl prior to the 1978 Musée de l’Art et d’Histoire exhibition has ever been identified.

Ionian Ram’s Head

The Ionian Ram’s Head appears on a linen fabric in a photograph recovered from the Medici Archive. *See* Exhibit 16A. Dating to 500-600 B.C.E., the Ionian Ram’s Head was looted from an Etruscan tomb in Italy. It first surfaced on the international art market when it was displayed at the Musée de l’Art et d’Histoire in Geneva from 1978-1981 and then at the Getty Museum from 1984-1996. On June 12, 1996, Symes sold the Ionian Ram’s Head to the Beierwaltes for \$120,000. In 2006, the Beierwaltes consigned their entire antiquities collection, to include the Ionian Ram’s Head, to Phoenix Ancient Art. In 2009, Steinhardt purchased the Ionian Ram’s Head from Phoenix Ancient Art for \$70,000. *See* Exhibit 16B for the most recent photograph of the Ionian Ram’s Head. Although Phoenix Ancient Art provided a warranty that it had “the right to sell” the object, no verifiable provenance for the Ionian Ram’s Head prior to the 1978 Musée de l’Art et d’Histoire exhibition has ever been identified.

Corinthian Bull’s Head

The Corinthian Bull’s Head appears on a linen fabric in a photograph recovered from the Medici Archive. *See* Exhibit 17A. Dating to circa 580 B.C.E. and characteristic of grave

goods that have been found in Etruscan tombs in Central Italy, the Corinthian Bull's Head first surfaced on the international art market when it was displayed at the Musée de l'Art et d'Histoire in Geneva from 1978-1981 and then at the Getty Museum from 1984-1996. On June 12, 1996, Symes sold the Corinthian Bull's Head to the Beierwaltes for \$75,000. In 2006, the Beierwaltes consigned their entire antiquities collection, to include the Corinthian Bull's Head, to Phoenix Ancient Art. In 2009, Steinhardt purchased the Corinthian Bull's Head from Phoenix Ancient Art for \$60,000. *See* Exhibit 17B for the most recent photograph of the Corinthian Bull's Head. Although Phoenix Ancient Art provided a warranty that it had "the right to sell" the object, no verifiable provenance for the Corinthian Bull's Head prior to the 1978 Musée de l'Art et d'Histoire exhibition has ever been identified.

Corinthian Lion Vessel

The Corinthian Lion Vessel appears on a linen fabric in a photograph recovered from the Medici Archive. *See* Exhibit 18A. Dating to circa 600-550 B.C.E., the Corinthian Lion Vessel is characteristic of grave goods that have been found in Etruscan tombs in Central Italy. The Corinthian Lion Vessel first surfaced on the international art market on June 12, 1996, when Symes sold the object to the Beierwaltes for \$25,000. In 2006, the Beierwaltes consigned their entire antiquities collection, to include the Corinthian Lion Vessel, to Phoenix Ancient Art. In 2011, Steinhardt purchased it from Phoenix Ancient Art for \$25,000. *See* Exhibit 18B for the most recent photograph of the Corinthian Lion Vessel. Although Phoenix Ancient Art provided a warranty that it had "the right to sell" the object, no verifiable provenance for the Corinthian Lion Vessel prior to the 1996 sale from Symes to the Beierwaltes has ever been identified.

Faliscan Askos

The Faliscan Askos appears chipped with bits of dirt at its base in a photograph recovered from the Medici Archive. *See* Exhibit 19A. Dating to 400-300 B.C.E., the antiquity features a painted Etruscan inscription under the base, indicating its origin in South-Central Italy. The Faliscan Askos first surfaced on the international art market in 1997, when Steinhardt purchased the Faliscan Askos from Phoenix Ancient Art with no prior provenance for \$55,000. In 2018, Steinhardt consigned it to Christie's Auction House, from where it was seized by this Office. *See* Exhibit 19B for the most recent photograph of the Faliscan Askos. Although Phoenix Ancient Art provided a warranty that it had "the right to sell" the object, no verifiable provenance for the Faliscan Askos prior to the 1997 sale from Phoenix Ancient Art to Steinhardt has ever been identified.

Marble Oscilla (4)

A set of four marble oscillum (collectively "the Marble Oscilla"), or Roman disks suspended on chains between columns in gardens, appear in dirt-encrusted fragments in multiple Polaroid photographs recovered from the Medici Archive. *See* Exhibit 20A. Depicting satyrs and female followers of Dionysus, the Marble Oscilla were crafted in Italy between 100 B.C.E. and 100 C.E. The Marble Oscilla first surfaced on the international art market in 1992, when Steinhardt purchased the antiquities from Robin Symes with no prior provenance for \$175,000. In 1998, Steinhardt sent the Marble Oscilla to a Brooklyn-based restorer for "cleaning and repair." *See* Exhibit 20B for the most recent photograph of the Marble Oscilla. No verifiable provenance for the Marble Oscilla prior to the 1992 sale from Symes to Steinhardt has ever been identified.

Spouted Bowl

The Spouted Bowl appears in two Polaroid photographs recovered from the Medici Archive. *See* Exhibit 21A. Dating to 2700-2200 B.C.E., the Spouted Bowl originated from a site on the Cycladic Island of Paros (Greece) that was extensively pillaged by Medici's looters. The Spouted Bowl first surfaced on the international art market in 1980, allegedly in the collection of the French singer Marie LaForet. Law-enforcement authorities later uncovered that LaForet was used as a front for Becchina and Medici to launder looted antiquities. In numerous documents seized by law-enforcement authorities from Becchina, the name of the *tombaro* Becchina paid for a looted antiquity appears next to the name used for the object's false provenance. Thus, many documents include LaForet's name handwritten next to the names of the *tombaroli* from whom Becchina received the looted antiquities. And, indeed, a black-and-white photograph of the Spouted Bowl appears with the note "LAFORET" in the upper right-hand corner in a document recovered from Becchina's records. In 1997, Symes sold the Spouted Bowl to the Beierwaltes. In 2006, the Beierwaltes consigned their entire collection, to include the Spouted Bowl to Phoenix Ancient Art. In November 9, 2006, Steinhardt purchased the Spouted Bowl from Phoenix Ancient Art for \$500,000. *See* Exhibit 21B for the most recent photograph of the Spouted Bowl. Although Phoenix Ancient Art provided a warranty that it had "the right to sell" the object, no verifiable provenance for the Spouted Bowl prior to its 1980 appearance with LaForet has ever been identified.

Giovanni Franco Becchina (11 antiquities)

Giovanni Franco Becchina (b. 1939) is a native of Sicily. In the 1970s, he moved to Basel, Switzerland, where he and his wife Ursula opened Antike Kunst Palladion Gallery.

Then, for almost forty years, Becchina was the head of a “*cordata*” (trafficking cell) in a lucrative criminal enterprise that used gangs of *tombaroli* to loot carefully chosen and insufficiently guarded archaeological sites throughout southern Italy—often in competition with another trafficker, the previously discussed Giacomo Medici. And like Medici, Becchina sometimes laundered his material through auction houses and other dealers such as Robin Symes. But Becchina—again, like Medici—also sold the stolen antiquities directly to private collectors and museums. For example, on July 1, 1994, Becchina wrote to Steinhardt to try to sell him antiquities. Noting “possibly there are in your collection items with which we [Rose and Giovanni Franco] are familiar since they may once have been in our hands.” Becchina continued, “the time may have come when it could be mutually beneficial for us to meet.”

In September 1995, after Italian and Swiss authorities raided Medici’s offices and warehouse in Geneva, Becchina moved back to Sicily, leaving his wife to manage his business in Basel. Ultimately, in May 2002, the Swiss and Italian authorities raided Antike Kunst Palladion and three of Becchina’s storage facilities—locating and raiding a fourth in 2005. The 2002 raids alone recovered 7,000 antiquities (including fragments) in various stages of restoration and thousands of documents and photographs. Referred to as the “Becchina Archive,” the collection totaled 13,000 documents, 4,000 photographs, and Becchina’s personal archive containing another 3,164 photographs. Examination of the Archive revealed that over 80% of the antiquities came from Apulia, and of the Apulian vases, over 90% came from a single source: convicted *tombatore* (and later intermediary trafficker) Raffaele Monticelli.

In 2001, Becchina was arrested in Italy and charged with receiving stolen goods, illegally exporting goods, and conspiring to traffic goods. In 2011, however, Judge Rosalba Liso

dismissed all charges due to the running of the statute of limitations. But the Judge also ordered the seizure of 5,919 of Becchina's antiquities, holding that "from the evidence...it emerges that Becchina bought antiquities from *tombaroli*." Addressing the antiquities themselves (both those seized and those depicted in the seized photographs), the judge found that "all come from clandestine excavations conducted in Italy...[and that]...the copious documentation seized from Becchina definitely certifies that those objects come from clandestine excavations and excludes any legitimate provenance." In October 2011 and again in June 2012, Italian appellate courts rejected Becchina's appeals and confirmed the confiscation.

The 82-year-old Becchina remains at large in Italy. To date, this Office has executed 16 seizures of 48 antiquities trafficked by Becchina.

Apulian African Head Flask

The Apulian African Head Flask appears lying on a white sheet in a Polaroid photograph recovered from the Becchina Archive. *See* Exhibit 22A. Crafted in Apulia in Southern Italy between 400-300 B.C.E., and featuring red and black paint, the Apulian African Head Flask first surfaced on the international art market when it was displayed at the Musée de l'Art et d'Histoire in Geneva from 1978-1981 before being displayed at the Getty from 1984-1996. These were the same exhibitions (and in the same order) used by Medici to launder his looted antiquities as described above. In 1996, Symes sold the Apulian African Head Flask to the Beierwaltes. In 2006, the Beierwaltes consigned their entire antiquities collection, to include the Apulian African Head Flask, to Phoenix Ancient Art. In 2009, Steinhardt purchased the object for \$130,000. *See* Exhibit 22B for the most recent photograph of the Apulian African Head Flask. Although Phoenix Ancient Art provided a warranty that it had

“the right to sell” the object, no verifiable provenance for the Apulian African Head Flask prior to the 1978 Musée de l’Art et d’Histoire exhibition has ever been identified.

Italo-Corinthian Duck Vessel

The Italo-Corinthian Duck Vessel appears dirt-encrusted in three photographs recovered from the Becchina Archive—two depicting the Italo-Corinthian Duck Vessel on a beige surface and one on a wooden floor. *See* Exhibit 23A. The object was crafted in Italy between 600-500 B.C.E. at the Faliscan archaeological site of Faleri—precisely where Becchina himself documented the Italo-Corinthian Duck Vessel had been looted. In the corner of two of the photographs, Becchina wrote “Faleri.” One of the Becchina photographs also features a handwritten “res. Getty AD 10,” indicating that the Italo-Corinthian Duck was once sold to the Getty Museum for \$10,000 and shipped to the museum. But it was ultimately returned to Becchina and the Museum was refunded. On June 2, 1989, Becchina sold the Italo-Corinthian Duck Vessel to Symes for \$10,000. In 1996, Symes sold the Italo-Corinthian Duck Vessel to the Beierwaltes for \$45,000. In 2006, the Beierwaltes consigned their entire antiquities collection, to include the Italo-Corinthian Duck Vessel, to Phoenix Ancient Art. In 2009, Steinhardt purchased it for \$25,000. *See* Exhibit 23B for the most recent photograph of the Italo-Corinthian Duck Vessel. Although Phoenix Ancient Art provided a warranty that it had “the right to sell” the object, no verifiable provenance for the Apulian the Italo-Corinthian Duck Vessel prior to the 1989 sale from Becchina to Symes has ever been identified.

Bronze Gorgons (3)

The set of three bronze brazier feet (the “Bronze Gorgons”) appear in photographs recovered from the Becchina Archive. *See* Exhibit 24A. Depicting Gorgons—a trio of sisters

famed in Greek mythology to have hair of living, venomous snakes—the Bronze Gorgons date to 500-475 B.C.E., and are characteristic of archaeological finds from Etruscan sites in Central Italy. On May 1, 1985, Becchina sold the three Bronze Gorgons to Vincenzo Zuchetto for 100,000 Swiss Francs. The Bronze Gorgons next appear at Basel Ancient Art Fair in November 2010 when Jerome Eisenberg, the owner of the New York-based Royal-Athena Galleries, purchased them for \$105,000 from the Jurgen Haering Gallery of Freiberg, Germany. Haering's invoice noted that the Bronze Gorgons were from the "collection Mildenberg, Zurich, Switzerland, since the 1960s." Leo Mildenberg was the late Swiss numismatist and antiquities collector who often brokered sales for Becchina, as well as for trafficker Raffaele Monticelli.

On September 4, 2014, Erdal Dere, the owner of New York-based Fortuna Fine Arts, emailed Steinhardt about the Bronze Gorgons, writing: "I also now spoke with Verena Brunner, Leo Mildenberg's niece, about the 3 Gorgons and she does not want to part with them at \$125,000." The Bronze Gorgons, however, were still owned by Royal-Athena Galleries. So, one day later—September 5, 2014—Fortuna Gallery purchased the Bronze Gorgons from Royal-Athena Galleries for \$130,000. Later the same day, Steinhardt purchased the Bronze Gorgons from Fortuna Gallery for \$150,000. Fortuna's Invoice contained the following provenance: "*Ex. Old Private European Collection (Ticino, Switzerland, 1960s). Ex. Dr. Leo Mildenberg Collection, Switzerland 1960s to Verena L. Brunner, Niece of Dr. Leo Mildenberg, Michigan 1980s to Present.*"

This provenance is completely false. As determined by interviews conducted pursuant to this investigation, 1) Verena Brunner, the niece of Dr. Leo Mildenberg, never spoke with Erdal Dere and never saw the Bronze Gorgons until presented with a photograph during this

investigation; 2) according to a family member, Leo Mildenberg was a Holocaust survivor who dedicated his collection to peace and beauty, never purchasing monsters like the Gorgons; and 3) according to the executor of the Mildenberg estate, Dr. Mildenberg never owned the Bronze Gorgons and certainly did not at the time of his death in 2001.

In September 2020, the Office of the U.S. Attorney for the Southern District of New York (SDNY) indicted Dere for a decades-long scheme to defraud customers of Fortuna Fine Arts using false provenance. Here, Fortuna falsely claimed on its invoice to Steinhardt that the Bronze Gorgons were “Legally Acquired.” *See* Exhibit 24B for the most recent photograph of the Bronze Gorgons. No verifiable provenance for the Bronze Gorgons prior to the 1985 sale from Becchina to Zuchetto has ever been identified.

Etruscan White-Ground Aryballos

The Etruscan White-Ground Aryballos appears in numerous photographs stapled to a single page in the Becchina archive. *See* Exhibit 25A. Depicting two women bathing, the Etruscan White-Ground Aryballos was crafted in Central Italy between 725-600 B.C.E. as a small accessory to contain fragrant oil or perfume. According to Becchina’s notes, between 1995 and 1997, he attempted to exhibit the Etruscan White-Ground Aryballos in museums and galleries to increase its value. In October 1998, the Etruscan White-Ground Aryballos first surfaced on the international art market when Fiorella Cottier-Angeli sold it to Phoenix Ancient Art. Dr. Cottier-Angeli worked for Swiss customs and was ultimately charged in Italy as a Medici co-conspirator for using her position in Swiss customs to facilitate the smuggling of trafficked antiquities. Steinhardt purchased the Etruscan White-Ground Aryballos from Phoenix Ancient Art for \$55,000 in 2009. *See* Exhibit 25B for the most recent photograph of

the Etruscan White-Ground Aryballos. Although Phoenix Ancient Art provided a warranty that it had “the right to sell” the object, no verifiable provenance for the Etruscan White-Ground Aryballos prior to the 1998 sale from Cottier-Angeli to Phoenix Ancient Art has ever been identified.

Geometric Oinochoe

The Geometric Oinochoe appears dirty and unrestored in a Polaroid photograph affixed to a page with numerous other Polaroid photographs of looted antiquities recovered from the Becchina Archive. *See* Exhibit 26A. Displaying narrow black lines along its stem and a bulbous base characteristic of Geometric-era pottery from Greece, the Geometric Oinochoe dates to the 9th century B.C.E. It was trafficked by Georgios Zenebisis, a Greek smuggler who was one of Becchina’s primary sources for looted Greek antiquities. In fact, in 2017, this Office seized and repatriated to Greece a sarcophagus fragment that had been smuggled out of Greece by Zenebisis and sold by Becchina to Royal-Athena Galleries. Here, Zenebisis sold the Geometric Oinochoe to Becchina. The Geometric Oinochoe first surfaced on the international art market on November 17, 2000, when Steinhardt purchased the Oinochoe from Becchina’s front-man Robert Hecht with no prior provenance for \$23,485. Here, Hecht falsely claimed on his invoice to Steinhardt that the Geometric Oinochoe was “exported legally from [its] country of origin.” In November 22, 2017, Becchina was convicted in Greece for “serial embezzlement of monuments.” Among the antiquities for which he was convicted was the Geometric Oinochoe—listed as item #70 on the judge’s confiscation order. *See* Exhibit 26B for the most recent photograph of the Geometric Oinochoe. No verifiable provenance for the Geometric Oinochoe prior to the 2000 sale from Symes to Steinhardt has ever been identified.

Figulina Plate

Featuring a painting of a bearded man approaching an enormous bull, the Figulina Plate appears in a photograph recovered from the Becchina Archive. *See* Exhibit 27A. The Figulina Plate dates to 540 B.C.E., and is characteristic of grave goods that have been found in Etruscan chamber tombs in Central Italy. The Figulina Plate first surfaced on the international art market on December 7, 2004, when Steinhardt purchased it from Becchina's front-man Robert Hecht with no prior provenance for \$48,375. *See* Exhibit 27B for the most recent photograph of the Figulina Plate. Although Hecht falsely claimed on his invoice to Steinhardt that the Figulina Plate was "[his] property," no verifiable provenance for the Figulina Plate prior to the 2004 sale from Hecht to Steinhardt has ever been identified.

Attic Black-Figure Eye Kylix

The Attic Black-Figure Eye Kylix appears unrestored in numerous Polaroid photographs recovered from the Becchina Archive. *See* Exhibit 28A. Crafted circa 540 B.C.E., the Attic Black-Figure Eye Kylix was looted from an Etrurian site in Central Italy. According to undated records recovered from Becchina's Archive, the Attic Black-Figure Eye Kylix had been trafficked by Mario Bruno, a well-known trafficker based in Lugano, Switzerland, who specialized in looting Etruscan tombs and was one of Becchina's primary sources for looted Italian antiquities. Bruno sold the Attic Black-Figure Eye Kylix to Becchina. By July 1992, Becchina arranged for it to be restored, photographed, and tested by Ralf Kotalla in Germany using Thermoluminescence Analysis ("TL Analysis"), a procedure to estimate the age of an object. Kotalla concluded that the Eye Kylix was approximately 2,550 years old. The Attic Black-Figure Eye Kylix first surfaced on the international art market on June 15, 2000, when

Steinhardt purchased it from Robert Hecht with no prior provenance for \$170,750. Here, Hecht falsely claimed on his invoice to Steinhardt that the Attic Black-Figure Kylix was “exported legally from [its] country of origin.” *See* Exhibit 28B for the most recent photograph of the Attic Black-Figure Eye Kylix. No verifiable provenance for the Attic Black-Figure Eye Kylix prior to the 1992 TL Analysis has ever been identified.

Bronze Handles (2)

The Bronze Handles appear in a photograph affixed to a page with numerous other Polaroid photographs of looted antiquities recovered from the Becchina Archive. *See* Exhibit 29A. Crafted as attachments to a volute-krater, a bowl used in antiquity to dilute wine, the Bronze Handles date to 580-560 B.C.E. According to undated records recovered from Becchina’s Archive, the Bronze Handles had been looted from Italy by Antonio “Nino” Savoca, a well-known trafficker who was another of Becchina’s sources for looted Italian antiquities. The records also indicate that by July 18, 1993, Becchina had moved the Bronze Handles to his Basel-based gallery, Antike Kunst Palladion. A note at the top of another document recovered from the Becchina Archive indicates that Becchina provided the Bronze Handles to “Bob.” Steinhardt’s records indicate he purchased the Bronze Handles on November 18, 1994, from Harry Bürki for \$92,500. Although Steinhardt wired the money to “H. Bürki,” Steinhardt’s records include a note that Robert (“Bob”) Hecht was the seller. Numerous records for the Bronze Handles and other Steinhardt antiquities reflect that Hecht and Bürki often jointly sold antiquities to utilize the faux-Bürki provenance. Here, Bürki falsely claimed on his invoice to Steinhardt that the Bronze Handles were “exported legally from their country of origin.” *See* Exhibit 29B for the most recent photograph of the Bronze Handles.

No verifiable provenance for the Bronze Handles prior to the 1993 Becchina possession has ever been identified.

Edoardo Almagià (10 antiquities)

Edoardo Almagià (b. 1951) is an Italian citizen born in New York. In the 1980s, Almagià began developing a highly lucrative criminal enterprise trafficking stolen antiquities from Italy. One Italian court described Almagià as “contribut[ing] to what was one of the greatest sacks of Italian cultural heritage, based on the sheer amount of stolen goods...Almagià and his co-conspirators have torn pages from the book of Italian history.”

Almagià’s trafficking network first came to the attention of law-enforcement authorities in 1992. Well-known *tombarolo* Moreno de Angelis—believing he had been cheated of more than 100 million lire by notorious *capozona* (regional crime boss) Pietro Casasanta —informed Italian authorities that Casasanta had looted a marble statue depicting the *Triade Capitolina* (three gods of the Roman Pantheon) from Guidonia Montecelio, a small suburb outside Rome. After he was arrested, Casasanta admitted that he had sent a Polaroid photograph of the freshly looted *Triade* to Almagià in New York. According to Casasanta, Almagià only offered \$20,000 for the multi-million-dollar statue. Rejecting Almagià’s offer, Casasanta sold the *Triade* to previously discussed trafficker Mario Bruno, who then sold the statue to Geneva-based collector George Ortiz for \$2.5 million. Under questioning, Almagià admitted to Italian law-enforcement officers that he had received the Polaroid photograph of the *Triade* from Casasanta. An Italian court described the exchange as follows: “Almagià was the first one to see the *Triade*. Since he knew that Casasanta had been excavating, he [Almagià] went every day to see what he [Casasanta] had found, and [Almagià] agreed to broker the sale

to the Met in New York of anything of great importance he [Casasanta] would find in his excavations.” Italian authorities ultimately recovered the Triade in 2012.

Almagià’s next brush with law-enforcement authorities came next, in 1996, when the Office of the U.S. Attorney for the Southern District of New York (SDNY) seized two dozen Etruscan ceramics from Antiquarium Ltd., a New York antiquities gallery. All 24 antiquities had been looted from the Italian archaeological site of Crustumerium (north of Rome). Following the completion of authorized excavations there in July 1987, Almagià paid *tombatori* to loot the site, and then he smuggled the stolen antiquities out of Italy through Switzerland and into New York. In October and November 1987, just months after they were illegally removed from the ground, Almagià sold the looted artifacts to Antiquarium. In 1997, the antiquities were repatriated to Italy.

Almagià’s next significant interaction with law-enforcement authorities was in 2000 when he was stopped at John F. Kennedy (JFK) International airport in Queens, New York. On this occasion, he had with him two stolen Italian frescoes from the ancient city of Herculaneum that he had falsely declared. Herculaneum was one of the cities buried by the eruption of Mount Vesuvius in 79 C.E. The nearby city of Pompeii was also buried by the eruption.

Six weeks later, one of Almagià’s commercial shipments was stopped in Newark, New Jersey. The shipment contained five stolen Italian antiquities and again was accompanied by false documentation. Through multiple interviews of Almagià and others, to include a confidential informant, law-enforcement authorities determined that Almagià was a major broker of looted antiquities and that he smuggled illegal antiquities into the United States via

shipping containers, DHL shipments, and in checked and carry-on luggage. In exchange for providing information to Italian authorities about other *tombatori*, Almagià was not charged in either Italy or the United States for antiquities recovered at JFK or in Newark that he had illegally removed from Italy and imported into the United States.

It took another six years for law-enforcement authorities to discover the true breadth and extent of Almagià's trafficking enterprise. During April 18-20, 2006, Department of Homeland Security Special Agents, along with officers of the Italian Carabinieri,² obtained legal authorization to enter Almagià's New York apartment (169 East 78th Street) and Storage Facility (Manhattan Mini-Storage, 420 E 62nd Street). There, they video-recorded dozens of antiquities at both locations and photocopied files related to Almagià's trafficking operation.

From the information obtained in these searches, law-enforcement authorities immediately identified seven antiquities that had been stolen from Italy. As a result, the Agents executed a search warrant on Almagià's New York apartment, seizing five of the stolen antiquities. Four days later, Almagià surrendered the sixth antiquity and arranged to meet with the Homeland Security Special Agent and federal prosecutor in charge of the case to surrender the seventh antiquity several days later. Instead of appearing to surrender the object, however, Almagià used the time to move the stolen antiquities and documents from his apartment and New York storage facility to a New Jersey storage facility and to a shipping container bound for Naples. Although the storage facility in New Jersey was not located at the time, Italian law-

² The Carabinieri Corps is the fourth branch of the Italian military, focused on national law enforcement, maintaining public security, and assisting local police. In 1969, the Carabinieri Tutela Patrimonio Culturale was created to combat theft and looting of Italian antiquities, overseeing all cultural property investigations in Italy. It also coordinates with international authorities and foreign law-enforcement agencies.

enforcement authorities did seize the shipping container in Naples. On December 14, 2006, they recovered 37 paintings and archaeological objects as well as thousands of documents and Polaroid photographs. But more than one hundred stolen antiquities from Almagià's apartment and Manhattan Mini-Storage and New Jersey Storage units have yet to be recovered

Immediately after the 2006 seizure, Almagià was charged in Italy with receiving stolen goods, the illegal export of goods, and criminal conspiracy to traffic such goods. During the proceedings, charged co-conspirator Mauro Morani, an extraordinarily prolific *tombarolo* who had been looting Italy for more than 20 years, agreed to cooperate with Italian authorities against Almagià. Over the course of three recorded depositions, Morani detailed how he personally raided tombs and archaeological sites in Cerveteri—the site of a 7th century B.C.E. Etruscan city approximately 35 miles northwest of Rome—and sold his finds (as well as those from other *tombaroli*) to Almagià, who then sold them at enormous profits in the United States. Based on Morani's own admissions and other evidence, the Court's experts determined the following:

Once Morani made a name for himself in the antiques-trafficking industry, he took on the dual role of head of tombaroli squads and mediator between the tombaroli and international traffickers by giving them [Almagià and others] the right of first refusal on the most valuable pieces just excavated from Cerveteri tombs. In the opening of his memoir, [Robert] Hecht, portrays Morani as a greedy man, a playboy who loves expensive suits and cars, and, therefore, is always ready to partner with traffickers who agree to pay in advance and ensure good profit-sharing.

The Court also adopted its experts' findings concerning Almagià:

Almagià's network of scholars, directors, and curators of the most important international museums, especially U.S. museums, was very useful for placing a great number of objects on the art market. This enhanced Almagià's ability to offer pieces of particular prestige to potential buyers, not only collectors, but also important museums...The seized documents have effectively demonstrated how Almagià came into possession of antiquities through Morani and his teams of tombaroli, to whom Almagià entrusted the research, the excavation, and the

shipping of the pieces to the United States, passing through Switzerland or England.

The seized documents and photographs from New York and Italy are collectively referred to as the “Almagià Archive.” It includes a ledger in Almagià’s handwriting labeled the “Green Book.” In this ledger, Almagià listed many of the antiquities he had sold, often grouping them by the *tombarolo* from whom he purchased the antiquity (sometimes even identifying the *tombarolo* by initials or an abbreviation). He also listed the price he paid the *tombarolo* for each antiquity, the price for which he sold it, and occasionally, to whom he sold the antiquity.

A sample page of the ledger amply demonstrates the methods of Almagià’s trafficking ring. At the top left, Almagià wrote “Estate 1994,” indicating that every antiquity on that page (and on subsequent pages until the next new heading) was sold in the summer (“estate”) of 1994. In Almagià’s neat hand-writing, there are three columns of information down the page: the description of the antiquity, how much Almagià paid for it (in dollars), and how much he sold it for (again, in dollars). In addition to this information, Almagià often added the name of the buyer in the left-hand margin and the *tombarolo* from whom he purchased the antiquity after the description. For example, the first two entries are an “Attic red fig. Lekythos w panther” and “small bucchero aryballos” that he bought for \$1,000 and \$200, respectively, from Mauro Morani (“Mau”) and sold to [Redacted], a New York City gallery, for \$2,000 and \$600, respectively. The next grouping of eight antiquities were sold to [Redacted], as were the last grouping of nine antiquities on that page (“[Redacted]”). For these 17 looted antiquities, Almagià paid Mauro Morani \$8,900 and sold them to [Redacted] for \$24,500. The third entry on the page is also telling: Almagià paid Morani \$22,000 for some Attic fragments (“Frammenti

Attici”) to Dietrich Felix von Bothmer, at the time, Distinguished Research Curator at the Met, and formerly head of the Department of Greek and Roman Art at the Met.

The complete ledger contains entries for almost 1,700 looted antiquities that Almagià purchased from *tombaroli* in Italy and then sold in the United States. In addition to the Green Book, the Archive contains photographs of almost 1,900 looted antiquities. It also contains invoices and lists of antiquities that Almagià bought from various *tombaroli* that he had not yet entered into the Green Book. Altogether, the Archive contains evidence (i.e., photographs, invoices, or Green Book entries) of thousands of looted antiquities.

The general operation of Almagià’s network, then, is clear. Like most traffickers, Almagià used different *tombaroli* for different areas of Italy (South, Central, Sicily, Sardinia, etc.), but he also used different *tombaroli* for different types of objects found in the same area. For example, as Morani explained in a deposition, because sculptures are heavy and their excavation requires great effort and large teams, resulting in less income per capita for each *tombarolo* and for the *capozona*, Morani chose not to excavate marble Roman sculptures. But rival *tombarolo* Casasanta would. Thus, Almagià would purchase Roman sculptures from Casasanta, but smaller antiquities such as Etruscan and Apulian pottery from Morani.

Each *tombarolo* also managed sales and purchases differently. For example, *tombaroli* in Cerveteri would loot antiquities and take Polaroid photographs, which Morani would send to Almagià in New York via DHL International GmbH (DHL). The Archive contains several such DHL receipts and envelopes. Once Almagià received the photographs, he used a prepaid telephone card to call Morani, select the antiquities he wanted, and pay Morani from a Swiss bank account. Morani would then pay his *tombaroli* and smuggle the antiquities to Switzerland

or England before Almagià smuggled them into New York. For example, on June 30, 1995, Almagià wrote to Steinhardt directly to thank him for the “reception on my part of a loan of 400.000\$ [sic] so as to allow me to complete the acquisition of a group of Archaic painted tiles which I was recently offered in Zurich.” Once objects reached Switzerland, Almagià arranged for them to be shipped to his apartment in New York—using companies such as Grosso Art Packers, Excel Shipping, and All States Air Cargo. Meanwhile, Almagià would create handwritten lists of Morani’s antiquities that he had paid for. According to Almagià’s daily planners, he then showed clients the objects by appointment in his apartment or at the clients’ residences. When an antiquity sold, Almagià drew a cross on his handwritten inventory lists. He would then compile those lists by *tombarolo*—Morani was not his only source—and periodically make the Green Book entries as detailed above. Although Almagià usually then destroyed the original lists, the Archive does contain some of those lists. Thus, the Archive contains photographs of almost all of the Apulian and Etruscan antiquities Almagià bought from Morani.

In contrast, Almagià did not always receive or maintain the photographs of Casasanta’s marble sculptures. He either saw the antiquities in person or destroyed the photographs after receiving the objects in New York. Accordingly, the Archive contains photographs of only a portion of the marble sculptures that Casasanta sold to Almagià. Specifically, the Green Book contains entries for twenty marble sculptures, but the Archive contains photographs of only six of the marble sculptures.

Nor did Almagià hide from his clients how he acquired so many extraordinary Italian antiquities that had never previously been seen on the market. On the contrary, it appears

from all of the evidence that Almagià was surprisingly candid with his clientele about his black-market supply of looted antiquities. For example, in order to inform them of objects that he would soon be able to offer for sale, he provided his clients with details of ongoing clandestine and illegal excavations. In order to explain delays in delivery, he listed which objects were still in Italy, which were in Switzerland, and which were already in New York. And, in order to explain increases in his sales prices, he even informed his clientele of his negotiations with the looters. Nor are these conclusions based solely on witness interviews. Almagià wrote many letters to buyers about recently found antiquities, amply demonstrating the cavalier disregard for the law of both Almagià and his buyers.

Many such letters to buyers around the United States have been recovered. The following two letters Almagià wrote to [Redacted] are representative. As will be seen, Almagià unabashedly describes the inner-workings of his trafficking operation. The first letter provides the following:

Enclosed you will find the invoice for the fragments you bought from me... They come from a place near Viterbo called Barbarano Romano. A first batch reached Switzerland sometime ago. It was soon followed by another group of them. At that point, since enough fragments were available, most of them were cleaned and the work of mounting them began. I myself did some of the work in N.Y., partly with the help of Robert Guy's remarkably sharp eye. I know from him you have in Texas a very good restorer, but please be patient. I know for sure [emphasis in original] that more fragments have been found, although I do not know how many and of which pieces. I am trying to get them, and I will. As soon as I shall have them, I will forward them to you...

Three details are worth noting. First, such detailed knowledge about an antiquity's find spot ("a place near Viterbo called Barbarano Romano") can only be possessed by excavators operating as part of a scientific excavation—which these *tombaroli* certainly were not—or by the looters themselves. Indeed, Almagià often admitted he visited the Etruscan tombs of

Barbarano Romano. For example, in a letter to his children, he explained that he “was invited by a journalist friend to stay ... in a small medieval town ... Barbarano is the name of the city ... I used to go there over thirty years ago.” With the letter, Almagià included photographs of several tombs labeled, “the remains of an Etruscan tomb, VII century B.C.” and “inside an Etruscan tomb where the dead were placed...”

Second, Almagià described an ongoing illegal excavation from which many fragments were looted over a period of time (“[a] first batch reached Switzerland...it was soon followed by another group”) and that the *tombaroli* were still actively looting (“for sure that more fragments have been found”). Third, he even describes his process of restoring the artifacts (“since enough fragments were available, most of them were cleaned and the work of mounting them began. I myself did some of the work in N.Y.”). In scientific and legally authorized excavations, of course, all antiquities are thoroughly cleaned following discovery. Therefore, the presence of dirt on an antiquity is a clear indication of its illegal excavation.

Almagià’s second letter to [Redacted] provided even more details:

...Allow me now to tell you what is the situation with your fragments. They are still in Italy and my source refuses to take them for he does not want to create a precedent by paying them the price asked, which he considers outrageous. As a result I came empty handed but with the assurance that the fragment are [sic] still available. I am afraid there is little else to do but to wait and hope...There is one small thing, however, I have been able to do. The two persons that have been making the excavation not [sic] seeing it eye to eye about the fragments are in a sort of quarrel. The friendlier of the two has a rather charming stemless kylix with Nike and Youth [emphasis in original] that comes from the same dig and that he can fully dispose of because it is his share of the “booty.” I have now been able to get that piece, which is practically complete, and it could thus be soon added to the group of your fragments waiting, as I hope, that you soon will be able to have the remaining part of what they have found...As you can see not all has gone so bad since, should you want it, another artifact from that dig can be added to what you already have.

Not only does Almagià admit that the illegal excavation is still active (“[t]he two persons

that have been making the excavation” and “you soon will be able to have the remaining part of what they have found”); but he also admits the fragments “are still in Italy.” Since all excavations in Italy have been State-run and owned since 1909, and all exports from Italy require a permit, Almagià had just told [Redacted] in writing that the fragments Almagià was offering him were illegal—illegal as a matter of law. As compensation for the delay of the delivery of the fragments, Almagià even offered [Redacted] another looted antiquity “that comes from the same dig” and which he can get from the “friendlier” *tombarolo* “because it is his share of the ‘booty’.”

There is no attempt to hide the fact that Almagià was dealing in recently looted “booty.” No clever obfuscation. No need to orchestrate the tried-and-true strawman auction sale, where the consignor and buyer are the same person, thereby laundering the stolen antiquity by causing it to appear at a “reputable” auction house. No need to present even a veneer of legality. No “need,” because it does not appear that his buyers—museums, dealers, and collectors alike—seemed to have cared. Almagià did not employ such tricks of the trade because they do not appear to have been necessary. From these and other letters and documents received by this Office from collectors, dealers, and museums involved in this network, Almagià appears to have been this candid with many buyers.

Based on this criminal activity, Italian prosecutor Paolo Giorgio Ferri brought charges against Almagià in Italy in 2006 for knowingly committing crimes against the cultural heritage of Italy.³ The indictment included charges of receiving stolen goods, illegally exporting goods,

³ Paolo Ferri is the famed prosecutor who pursued charges against the most infamous *tombaroli* of our modern age, including Giacomo Medici, Giovanni Franco Becchina, Robert Hecht, Robin Symes, and Fritz and Harry

and participating in a criminal conspiracy to traffic such goods. Ultimately, however, the charges were dropped because of the running of the statute of limitations.

Nonetheless, on December 5, 2013, the presiding judge of the *Tribunale Ordinario di Roma*, Judge Boffi, ordered the confiscation of Almagià's antiquities that had already been seized in New York and Naples, as well as those of Almagià's antiquities that had yet to be located. Judge Alessandra Boffi explained that "it is worth recalling that Almagià...ha[s] not contested that the ownership of these objects belongs to the Italian State..." Of particular relevance, Judge Boffi noted that "Almagià still owns in the United States...a conspicuous number of looted archaeological finds belonging to the Italian State," and ordered the confiscation of any looted Italian antiquities whose location was unknown at the time of the Order. She also held that Italy's ownership of the artifacts did not change simply because the statute of limitations against Almagià's criminal charges had expired: "if there is an acquittal for reasons that do not concern the materiality of the act, it does not interrupt the relationship between the 'res' and the offense."

Almagià appealed the confiscation order, but was unsuccessful. In 2015, the Supreme Court of Cassation, Italy's highest court, affirmed Judge Boffi's order. The Court ruled that Judge Boffi "recognized the full involvement of the applicant [Almagià] in the trafficking of cultural property and charged him with the highest crimes, but the proceeding resulted in a dismissal decree because the offenses were barred by prescription [statute of limitations]." The court explained that "the confiscation of cultural assets illegally exported abroad does not

Bürki. Tragically, he passed away on June 14, 2020, while he was working with this Office on this investigation and several other cases, including those involving Almagià. Our last meeting was only a few days before his final hospitalization, and our next scheduled meeting just a few days after he passed.

necessarily require the simultaneous criminal conviction against the perpetrator of the crime.” Accordingly, Judge Boffi’s order confiscating Almagià’s antiquities, regardless of whether their location was known or unknown at the time of the order, was upheld. The confiscation order, therefore, is a legal order and is still in effect today.

The 71-year-old Almagià remains at large in Italy. To date, this Office has executed 19 seizures of 172 antiquities trafficked by Almagià.

Etruscan Panels (4)

A set of four Etruscan terracotta panels depicting mounted knights (the “Etruscan Panels”) appears dirt-encrusted and lying on an Italian newspaper in a photograph recovered from the Almagià Archive. *See* Exhibit 30A. Dating to circa 600-501 B.C.E., the Etruscan Panels were crafted in Central Italy. The Almagià Archive photograph is undated, but the Etruscan Panels are lying on newspaper with an advertisement for the 1993 celebration of the 60th Anniversary of the Topolino Magazine. The Etruscan Panels first surfaced on the international art market on August 22, 2001, when Steinhardt purchased the four panels directly from Almagià with no prior provenance for \$155,000. Here, Almagià falsely claimed on his invoice to Steinhardt that the Etruscan Panels were “ex Hunziger family, Zurich.” *See* Exhibit 30B for the most recent photograph of the Etruscan Panels. No verifiable provenance for the Etruscan Panels prior to the 2001 sale from Almagià to Steinhardt has ever been identified.

Polychromed Terracotta Antefix

The Polychromed Terracotta Antefix appears in a photograph recovered from the Almagià Archive. *See* Exhibit 31A. Depicting the head of a maenad—a female follower of the

Greek god Dionysus—the Polychromed Terracotta Antefix was crafted between 600 and 501 B.C.E. in Cerveteri, an Etruscan site in Central Italy that suffered heavy looting by Almagià’s *tombaroli*. Almagià’s Green Book lists one “Archaic Antefix w. tile” purchased from a *tombarolo* for \$2,000 and sold for \$7,500. The Polychromed Terracotta Antefix first surfaced on the international art market on August 22, 2001, when Steinhardt purchased it directly from Almagià with no prior provenance for \$10,000. *See* Exhibit 31B for the most recent photograph of the Polychromed Terracotta Antefix. No verifiable provenance for the Polychromed Terracotta Antefix prior to the 2001 sale from Almagià to Steinhardt has ever been identified.

Corinthian Aryballos in the Form of a Helmeted Head

The Corinthian Aryballos in the Form of a Helmeted Head appears in a photograph recovered from the Almagià Archive. *See* Exhibit 32A. Dating to circa 500 B.C.E., the Corinthian Aryballos in the Form of a Helmeted Head served as a small jar used to hold oil or other unguent. Such vessels were traded extensively in Italy and, specifically, the Etrurian region of Central Italy where the demand among elite Etruscans was high. An undated note in the Yellow Book indicates Almagià bought this antiquity, described as an “Unguentarietto Etrusco corinzio” (a small Etruscan-Corinthian ointment jar) from a *tombarolo*. The Corinthian Aryballos in the Form of a Helmeted Head first surfaced on the international art market on November 3, 1998, when Steinhardt purchased it directly from Almagià with no prior provenance for \$5,000. *See* Exhibit 32B for the most recent photograph of the Corinthian Aryballos in the Form of a Helmeted Head. No verifiable provenance for the Corinthian Aryballos in the Form of a Helmeted Head prior to the 1998 sale from Almagià to Steinhardt

has ever been identified.

Attic Black-Figure Amphora

The Attic Black-Figure Amphora appears in a photograph recovered from the Almagià Archive. *See* Exhibit 33A. Featuring running figures and floral details, the Attic Black Figure Amphora was crafted circa 550 B.C.E. and is characteristic of Etrurian archaeological sites in Central Italy and archaeological sites in Sicily. Almagià's Green Book lists one "Attic BF [Black-Figure] Amphora" purchased from a *tombarolo* for \$6,500, and then sold for \$13,000. Almagià's day planner lists "Steinhardt" on March 18, 1997, preceding a note on April 2, 1997, "prendere vase da [sic] Steinhardt" (take vase of Steinhardt). Although Steinhardt's records note that there is "no record of purchase," the records also indicate that Steinhardt accessioned the Attic Black-Figure Amphora in 1997 from Almagià. *See* Exhibit 33B for the most recent photograph of the Attic Black-Figure Amphora. No verifiable provenance for the Attic Black-Figure Amphora prior to the 1997 sale from Almagià to Steinhardt has ever been identified.

Archaic Faience Aryballoi (2)

The Archaic Faience Aryballoi appear in a photograph recovered from the Almagià Archive. *See* Exhibit 34A. Made of faience, a type of tin-glazed earthenware, the set of two aryballoi date to circa 600-500 B.C.E. As elite Etruscans sought out precious and expensive scents from the Orient, Rhodian vessels—like the Archaic Faience Aryballoi—arrived in the Etrurian region of Central Italy via the ancient maritime trade. An undated note in Almagià's Yellow Book indicates that Almagià bought an "aryballos en faience rodeo" (Rhodian Faience Aryballos) from a *tombarolo*. The Archaic Faience Aryballoi first surfaced on the international art market on February 6, 1996, when Steinhardt purchased the pair directly from Almagià

with no prior provenance for \$12,000. *See* Exhibit 34B for the most recent photograph of the Archaic Faience Aryballoi. No verifiable provenance for the Archaic Faience Aryballoi prior to the 1996 sale from Almagià to Steinhardt has ever been identified.

Faience Baboon

Dating to 600-500 B.C.E., the Faience Baboon is a zoomorphic vessel used to hold oil and other unguents. Although no Almagià Archive photograph has been recovered for the Faience Baboon, the antiquity appears on the same February 6, 1996, invoice as the pair of Archaic Faience Aryballoi discussed previously. All three antiquities also originate from the same region—archaeological sites in the Etrurian region of Central Italy and in Southern Italy—where Almagià’s *tombaroli* specialized in looting sites. Further, after more than a decade investigating Almagià, resulting in the recovery of hundreds of Italian antiquities world-wide, law-enforcement authorities have never identified a single occasion in which Almagià was the first documented possessor of a legal antiquity. The Faience Baboon first surfaced on the international art market on February 6, 1996, when Steinhardt purchased it directly from Almagià with no prior provenance for \$9,000. *See* Exhibit 35 for the most recent photograph of the Faience Baboon. No verifiable provenance for the Faience Baboon prior to the 1996 sale from Almagià to Steinhardt has ever been identified.

Robin Symes (12 antiquities)

Robin Symes (b. 1939) is a now-disgraced London-based antiquities dealer born in Dorchester-on-Thames, United Kingdom who worked with known traffickers Robert Hecht, Giacomo Medici, and Giovanni Franco Becchina. Symes began trafficking in illicit antiquities in the 1960s when he first opened his antiquities business. In the 1970s, his life-partner,

Christo Michaelides, also became his business partner.

In 2001, Italian authorities charged Symes, Medici, Hecht, Fritz Bürki, Marion True, and others with trafficking in looted antiquities. Medici was convicted, but the charges against Symes, True, Hecht, and the others were dismissed due to the running of the statute of limitations.

Symes was also investigated by Greek authorities. On April 12, 2006, Greek authorities executed a search on a residence in Athens occupied by Symes and Michaelides that was owned by the Michaelides family. After 12 antiquities were seized in Athens, the investigative team departed the next day for the Cycladic island of Schinoussa, where the Michaelides family had a villa. The raid recovered 159 antiquities at Schinoussa from the buildings in the villa compound. But authorities were unable to move some of the larger structural pieces – including a church that had been completely reconstructed from various architectural elements of looted Byzantine temples. During the raid at Schinoussa, they also recovered 17 dark green binders containing 2,217 documents and photographs concerning approximately 1,500 antiquities. These photographs generally showed artifacts post-restoration, but they also seized Polaroid photographs of looted and dirty antiquities. Collectively known as the “Symes Archive,” this material proved that Medici and Becchina were supplying antiquities to Symes who would, in turn, serve as their front-man, selling the best stolen antiquities to high-end European and American buyers. For example, on January 27, 1993, while attempting to sell an antiquity directly to Steinhardt, Symes wrote in a letter, “I will discover from my man the actual findspot and will let you know.”

Symes has also been the subject of civil lawsuits concerning his antiquities. After

Michaelides died under mysterious circumstances in 1999 (allegedly falling and hitting his head at the estate of Shelby White and Leon Levy in Terni, Italy), Symes sued the Michaelides heirs, Despina and Dimitri Papadimitriou, in Athens over the estate. Then the Papadimitriou family counter-sued in London. On February 28, 2001, solicitors under court order on behalf the Papadimitriou family, seized five of Symes's premises in London and froze his bank accounts. In May 2002, Symes received a loan of \$1 million from Steinhardt in order to finance his legal battles. In January 2005, the High Court in London sentenced Symes to two years' imprisonment for perjurying himself by concealing the full extent, location, and value of his antiquities collection. Although Symes testified that he had antiquities stored in only 5 locations, the High Court determined he had 17,000 antiquities valued at more than £125 million (approximately \$173 million) hidden in 33 locations, in London, New York, and Geneva.

The London High Court also authorized Italian authorities to enter the warehouses and photograph any antiquities for which they had not already been given photographs by U.K. authorities. Italian experts were, therefore, able to examine photographs and documents (where they existed) of approximately 17,000 Greek, Roman, and Etruscan artifacts in Symes's warehouses. The experts determined—and the Italian court agreed—that at least 1,000 of the antiquities had been looted from Italy by *tombatori* affiliated with Medici and Becchina: “Symes bought antiquities from Medici [and Becchina]” with whom Symes enjoyed a “close and continuous relationship.” The separately seized Medici Archive similarly contained evidence that Symes acted as Medici's intermediary for sales to museums and auctions houses.

Nonetheless on April 18, 2014, Italian Judge Cinzia Parasporo declined to order the

forfeiture of any of Symes’s antiquities seized in London: “it is clear that the experts, from the photographs, were able to determine the [Italian] origin of the seized assets, [but] the photographs did not allow them to determine their authenticity.” Thus, because the experts did not have the opportunity to examine Symes’s antiquities in person, they could not prove the objects were authentic. And absent proof of authenticity, the court would not order their confiscation—unlike in the cases of Medici, Becchina, and others, in which the experts examined the objects themselves. But Judge Parasporo did conclude “that Symes and his partner and life companion have concluded antiquities sales agreements with Medici, and participated in triangulations, acting as a figurehead or as an intermediary for sales to museums and auction houses.” The Judge also found that Medici and Symes/Michaelides had conspired “to fix the market prices for a series of very important antiquities worth over \$12 million in 1992.”

The 82-year-old Symes remains at large in the United Kingdom while the Italian and Greek investigations continue. To date, this Office has executed 6 seizures of 15 antiquities trafficked by Symes. The 12 Symes-trafficked antiquities seized from Steinhardt include the already repatriated Bull’s Head and Calf Bearer.

Attic Black-Figure Plemochoe

The Attic Black-Figure Plemochoe appears in various stages of restoration—from entirely dirt-encrusted to post-restoration—in photographs recovered from the Symes Archive. *See* Exhibit 36A. Finely painted with bands of black and red tongues, the Attic Black-Figure Plemochoe dates to 600-501 B.C.E. and originated from an archaeological site in Sicily, Italy. The Symes Archive also contains a photograph of the Attic Black-Figure Plemochoe

taken in 1985 by Dieter Widmer, a Basel-based photographer who worked extensively with Medici, Becchina, and other traffickers. But it is the first appearance on the international art market of the Attic Black-Figure Plemochoe in 1989 that highlights in stark relief the critical role auction houses played in laundering looted antiquities. In 1989, Sotheby's London held the Attic Black-Figure Plemochoe as collateral to for a loan to Budico SA., a front company operated by Henri-Albert Jacques, a Swiss national who served to launder antiquities for Medici and Symes (and was charged as a Medici co-conspirator in Italy).

While the Attic Black-Figure Plemochoe was at Sotheby's, however, it was stolen by a Sotheby's employee. London's Metropolitan Police Services recovered the Attic Black-Figure Plemochoe and, in 1991, the Sotheby's employee responsible for the theft was convicted. In December 2002, Budico SA returned the Attic Black-Figure Plemochoe to Sotheby's, where Steinhardt purchased it for \$84,083. A handwritten note recovered from Steinhardt's files includes the provenance "Cat. Sotheby's NY, 11 December 2002" and "Ex. Private Coll. London, RS + CM," the latter of which was not included in the Sotheby's catalogue. The initials "London, RS + CM" refer to Robin Symes and his partner Christo Michaelides. *See* Exhibit 36B for the most recent photograph of the Attic Black-Figure Plemochoe. No verifiable provenance for the Attic Black-Figure Plemochoe prior to its possession by Symes has ever been identified.

Bronze Oinochoe

The Bronze Oinochoe appears dirty and unrestored in a photograph recovered from the Symes Archive. *See* Exhibit 37A. Dating to 500-450 B.C.E., the Bronze Oinochoe features the head of a Gorgon flanked by rosettes at its handle and originated in the Etrurian region of Italy.

The Bronze Oinochoe first surfaced on the international art market on December 12, 1995, when Steinhardt purchased the Bronze Oinochoe directly from Symes with no prior provenance for \$180,000. *See* Exhibit 37B for the most recent photograph of the Bronze Oinochoe. No verifiable provenance for the Bronze Oinochoe prior to the 1995 sale from Symes to Steinhardt has ever been identified.

White-Ground Lekythos

The White-Ground Lekythos appears partially covered in dirt in a photograph recovered from the Symes Archive. *See* Exhibit 38A. Dated to approximately 420 B.C.E. and originating in Greece, the White-Ground Lekythos was decorated by the “Triglyph Painter” with a funerary scene featuring a woman and a youth, painted in red atop a white background. The White-Ground Lekythos first surfaced on the international art market on June 22, 1995, when Robin Symes sold it to the Beierwaltes for \$360,000. In 2006, the Beierwaltes consigned their entire antiquities collection, to include the restored White-Ground Lekythos, to Phoenix Ancient Art. On December 14, 2006, Steinhardt purchased the White-Ground Lekythos from Phoenix Ancient Art for \$380,000. *See* Exhibit 38B for the most recent photograph of the White-Ground Lekythos. Although Phoenix Ancient Art provided a warranty that it had “the right to sell” the object, no verifiable provenance for the White Ground Lekythos prior to the 1995 sale from Symes to the Beierwaltes has ever been identified.

Ivory Plaque

The Ivory Plaque appears in two photographs—one caked with mud beside small ivory fragments and one post-restoration—recovered from the Symes Archive. *See* Exhibit 39A. Crafted in Northern Iraq between 800 and 701 B.C.E., the Ivory Plaque depicts a human-

headed winged sphinx. The Ivory Plaque once decorated the royal furniture from the period of King Sargon I (721-725 B.C.E.) in Nimrud. During the early 1990s, especially during and in the aftermath of Operation Desert Storm, extensive looting occurred in northern Iraq in and around Nimrud. Several regional museums in Iraq containing ivory plaques from Assyrian palaces were also looted. The Ivory Plaque first surfaced on the international art market on November 2, 1994, in the hands of Symes. Despite that fact that Symes wrote in the invoice to the Beierwaltes that the Ivory Plaque was characteristic of ivory fragments recovered from “Fort Shalmanesarat (sic) in Nimrud” and at Sargon’s palace in Khorsabad, despite the significant reporting in the media of widespread looting of those areas, and despite the fact the Ivory Plaque had no provenance whatsoever, the Beierwaltes bought the Ivory Plaque from Symes for \$320,000. In 2006, the Beierwaltes consigned their entire collection, to include the Ivory Plaque, to Phoenix Ancient Art. On September 10, 2010, Steinhardt purchased the Ivory Plaque from Phoenix Ancient Art for \$400,000. *See* Exhibit 39B for the most recent photograph of the Ivory Plaque. Although Phoenix Ancient Art provided a warranty that it had “the right to sell” the object, no verifiable provenance for the Ivory Plaque prior to the 1994 sale by Symes to the Beierwaltes has ever been identified.

Situla

The Situla, an ancient bucket-shaped vessel, appears covered in dirt and encrustations in three photographs taken in 1995 by the Basel-based Dieter Widmer and later recovered from the Symes Archive. *See* Exhibit 40A. Dating to 100-200 C.E., the enameled Situla is characteristic of Gallo-Roman enameled vessels, particularly examples found in the northern part of Italy between the Alps and the Apennines (ancient Roman Gallia Cisalpina) and from

Benevento in the south. The Situla first surfaced on the international art market on October 5, 1995, when Symes sold the antiquity to the Beierwaltes for \$320,000. In 2006, the Beierwaltes consigned their entire collection, to include the now-restored Situla with an attached handle, to Phoenix Ancient Art. On October 14, 2009, Steinhardt purchased the Situla from Phoenix Ancient Art for \$250,000. *See* Exhibit 40B for the most recent photograph of the Situla. No verifiable provenance for the Situla prior to the 1995 sale by Symes to the Beierwaltes has ever been identified.

Warrior and Rider Figures (2)

The large bronze figurines of a helmeted warrior and rider (“Warrior and Rider Figures”) appear in two sets of photographs recovered from the Symes Archive. In one set of photographs, they are dirt-encrusted and in the other they are cleaned and restored. *See* Exhibit 41A. The Warrior and Rider Figures date to circa 800-701 B.C.E. and originate in the Etrurian region of Italy. The Warrior and Rider Figures first surfaced on the international art market on April 23, 1990, when Steinhardt purchased the two antiquities directly from Symes with no prior provenance for \$320,000. Copies of the Symes photographs also appear in files recovered from Steinhardt. On the reverse side of each Symes photograph found in Steinhardt’s possession is a label describing the antiquities as part of the Steinhardt Collection. *See* Exhibit 41B for the most recent photograph of the Warrior and Rider Figures. No verifiable provenance for the Warrior and Rider Figures prior to the 1990 sale by Symes to Steinhardt has ever been identified.

Antelope Standard and Bird Rattles (3)

Dating to circa 1000 to 500 B.C.E., the Antelope Standard and Bird Rattles are

characteristic of (and have only ever been found in) the Malazgirt District in the Muş province of Eastern Turkey. According to minutes from an October 30, 1986, meeting of officials of the Erzurum Directorate in Turkey, local villagers claimed to have found (and wanted to return for a reward) three dozen antiquities, including bronze animal figurines, in the Malazgirt District in the Muş province. But on June 4, 1987, the Director of the Erzurum Museum determined that all the antiquities that had brought to the museum from Muş for a reward were, in fact, “acquired from illegal excavations.” Because the antiquities had been looted, the villagers were not paid or given any reward. On April 24, 1991, shortly after more reports of looting, Steinhardt purchased the Antelope Standard and Bird Rattles—bronze animal figurines—directly from Symes for \$84,000. *See* Exhibit 42 for the most recent photograph of the Antelope Standard and Bird Rattles. No verifiable provenance for the Antelope Standard and Bird Rattles prior to the 1991 sale by Symes to Steinhardt has ever been identified.

Robert Hecht (45 antiquities)

Robert Emmanuel Hecht (b. 1919) was a Paris-based antiquities dealer born in Baltimore, Maryland. In 1946, while studying archaeology at the University of Zurich, Hecht met Fritz Bürki, who, at the time, worked as a doorman and sporadically did restoration work for the Archaeology Faculty. In the early 1950s, Hecht started selling antiquities and moved to Rome.

In 1962, Hecht was caught on a flight attempting to smuggle gold coins out of Turkey. The coins were confiscated and Hecht declared *persona non grata* in Turkey. Hecht had also been expelled from Italy, but in 1963 was allowed back in—at first, for one month at a time, then for three months, and finally in 1965, he was authorized to live in Italy for one year at a

time. All the while, Hecht continued trafficking in antiquities with Medici until, in June 1973, Hecht fled Italy after a criminal tribunal in Rome issued an arrest warrant, charging him with buying, illegally exporting, and selling to the Met one of the most famous looted antiquities of the last 50 years, the Euphronios Crater. At Hecht's trial *in absentia*, a *tombarolo* named Roberto Biscetti testified that "*tombaroli* were afraid of Hecht because he was in touch with Italian mafia" and that "Hecht had traded looted antiquities from Cerveteri for years." The criminal tribunal initially acquitted Hecht, but he was subsequently convicted on appeal. In 1976, however, the Supreme Court of Cassation set aside the conviction.

Then, in 1997, Hecht, Fritz Bürki, and well-known collector Jonathan Rosen were indicted in Italy for the theft and sale of the Guglielmini Tripod and Etruscan Candle Holder stolen from Villa Giulia. In 2000, these defendants were joined with Medici's trial. Then, in February 2001, French and Italian authorities executed a search warrant on Hecht's apartment in Paris, recovering 43 antiquities hidden under his bed, 24 folders of documents, and Hecht's memoirs. Of the 43 antiquities, 42 were authentic and 32 were from Italy. The memoirs detailed many of the illegal antiquities he had trafficked over the years, and the folders contain articles, letters, photographs, sale records, and auction sales of antiquities. Together, they are collectively referred to as the "Hecht Archive." In a draft of his autobiography, Hecht attempted to explain away his trafficking: "[d]uring my 50 years of dealing with antiquities I have accidentally bought objects that were really 'stolen' from museums or excavations." Steinhardt's name appears 14 times in the draft of the autobiography.

At trial, antiquities dealer Freida Tchakos testified that "Hecht was...selling a lot to Steinhardt, his relationship with Steinhardt started five or six years ago, replacing Bob

Haber, and probably it had been Hecht who fabricated the tale of the phiale to do away with his rival. In Steinhardt's house, ten years ago, I have seen many beautiful objects, especially Corinthian bronzes and helmets. He had the bronze sphynx from Naples that he later returned; a fresco with a young Hercules, sold by Hecht and of which I have seen a photograph at [*tombarolo* Raffaele] Monticelli's house —a character well connected to both Hecht and Becchina." On January 1, 2012, the Judge dismissed the case for the running of the statute of limitations, but added, "it should be noted, however, following the outcome of the preliminary investigation carried out up to now, it is not possible to acquit Hecht for any of the charges he has disputed [...] the evidence acquired so far does not allow Hecht to contest even the conspiracy crime." Finally, the judge ordered that Hecht's assets be returned to their legitimate owner: "namely the Italian State."

Hecht died in Paris in February 2012. To date, this Office has executed 4 seizures of 47 antiquities trafficked by Hecht.

Kouros

The Kouros appears broken, dirty, covered in graffiti written in Greek, and lying on a pallet in the dirt in two photographs recovered from Steinhardt's files. *See* Exhibit 43A. Crafted circa 560 B.C.E., the Kouros depicts a youth with 14 rows of braids and is characteristic of *kouroi* found in archaeological sites in Greece. While the photographs recovered from Steinhardt's files are undated, the images are consistent with those taken by looters shortly after illicit excavations to prove the authenticity of antiquities to prospective buyers. A photograph of the same Kouros was recovered from the Hecht Archive. *See* Exhibit 43B. In the Hecht Archive photograph, the Kouros appears mounted upside down surrounded by

restoration tools in the Zurich laboratory of Fritz and Harry Bürki, a father-son duo of restorers who cleaned antiquities supplied by Medici, Becchina, and other traffickers.

The kouros illustrates the practice of creating “orphans” referred to earlier. As previously discussed, looters and smugglers often intentionally break large statues into smaller pieces to ease transport and avoid detection by customs and other law-enforcement officials. Both the post-looting photographs and the Hecht Archive restoration photograph depict the same statue: in both photographs, the Kouros has 14 rows of braids, the same break at the neck, and the same distinctive scarring—e.g., a sickle shaped scar on the shoulder and an inverted “v” scar over the genitals. But in the post-looting photographs of the Kouros on the pallet, the Kouros has both arms and both legs (to just below the knee). Thus, when it was looted, the Kouros was relatively intact. But the Hecht Archive photograph from the Bürki laboratory in Zurich, taken after the Kouros had been smuggled from Greece to Zurich, depicts the Kouros as missing both arms and both legs.

The Kouros first surfaced on the international art market on November 17, 2000, when Steinhardt purchased the Kouros directly from Hecht with no prior provenance for \$2,348,500. Here, Hecht falsely claimed on his invoice to Steinhardt that the Kouros was “exported legally from [its] country of origin.” *See* Exhibit 43C for the most recent photograph of the Kouros. No verifiable provenance for the Kouros prior to the 2000 sale from Hecht to Steinhardt has ever been identified.

Griffin Cauldron with Stand

The Griffin Cauldron with Stand appears broken with the *lebes*, or ancient metal cauldron, dirt-encrusted and broken in two parts in photographs recovered from the Hecht

Archive. *See* Exhibit 44A. Originating from a princely tomb located in the Lazio region of Italy, the Griffin Cauldron with Stand was crafted from bronze circa 700 B.C.E. The Griffin Cauldron with Stand first surfaced on the international art market on April 22, 2003, when Steinhardt purchased it directly from Hecht with no prior provenance for \$475,000. Although the invoice lists this purchase price, other records recovered from Steinhardt's files indicate that he purchased the Griffin Cauldron with Stand for \$3,000,000. *See* Exhibit 44B for the most recent photograph of the Griffin Cauldron with Stand. No verifiable provenance for the Griffin Cauldron with Stand prior to the 2003 sale from Hecht to Steinhardt has ever been identified.

Gold Broach

Comprising approximately five interlocking feline figures, the Gold Broach dates to circa 600 B.C.E. and was crafted on the Greek island of Rhodes. In a photograph recovered from Steinhardt's records, the Gold Broach appears lying on a white sheet next to an alabastron (an oblong vessel) and two wires or cords. *See* Exhibit 45A. In an October 22, 1999, letter from Hecht to Steinhardt, Hecht wrote that the Gold Broach was "found with" an "alabastron with the cartouche of Nekko II ca. 615-590 B.C." As addressed previously, unless an antiquity was discovered pursuant to a scientific and legally authorized excavation, detailed knowledge about that antiquity's "find spot" and how it was found can only be possessed by the looter. It is well-known, therefore, that information from a seller identifying the find spot of an unprovenanced antiquity is often an indication that it has been looted. Hecht's letter continues, "(1) root-fuzz which can be seen in the field among the smaller lions." The presence of such delicate vegetation ("root fuzz") on the antiquity further underscores its recent removal from the ground.

The Gold Broach first surfaced on the international art market on September 29, 1999, when Steinhardt purchased the Gold Broach for \$728,000 from Harry Bürki. Although Steinhardt received an invoice from “H. Bürki”, numerous records for the Gold Broach and other Steinhardt antiquities reflect that Hecht and Bürki often jointly sold antiquities to utilize the faux-Bürki provenance. Here, Bürki falsely claimed on his invoice to Steinhardt that the Gold Broach was “exported legally from [its] country of origin.” In 2017, Steinhardt attempted to sell the Gold Broach to Sheik Hamad al-Thani, stating “I will sell [the Gold Broach and another antiquity] for \$1.6 million—no less.” Sheik al-Thani declined to purchase the objects because the provenance was not strong enough. *See* Exhibit 45B for the most recent photograph of the Gold Broach. No verifiable provenance for the Gold Broach prior to the 1999 sale from Bürki/Hecht to Steinhardt has ever been identified.

Minoan Hoard (33)

Containing spears, stone vessels, and metal fragments, the Minoan Hoard consists of 33 dirt-encrusted objects from 1500-800 B.C.E. and originating in Crete, Greece. In a photograph recovered from Steinhardt’s records, 16 objects of the Minoan Hoard appear dirt-encrusted lying on a white sheet. *See* Exhibit 46A. The only known documentation of the Minoan Hoard is its appearance on the same September 29, 1999, invoice as the Gold Broach, when Steinhardt purchased the Minoan Hoard from Bürki/Hecht for \$92,000. Here, Bürki falsely claimed on his invoice to Steinhardt that the Minoan Hoard were “exported legally from their country of origin.” Steinhardt’s records refer to the set of objects as a “hoard.” As previously discussed, within the archaeological community, a “hoard” (a series of objects buried together in antiquity) is extensively studied for its sociological and anthropological

insights into ancient civilizations. Thus, the discovery of a hoard is heavily reported and widely published. The sudden appearance on the international art market of an unprovenanced (and unpublished) hoard such as the Minoan Hoard, therefore, is often an indication that the objects have been recently looted. *See* Exhibit 46B for the most recent photograph of the Minoan Hoard. No verifiable provenance for the Minoan Hoard prior to the 1999 sale from Hecht to Steinhardt has ever been identified.

Female Figurine with Seven Gold Dress Ornaments (8)

A small crowned figure crafted from metal along with seven carved gold ornaments, the Female Figurine with Gold Dress Ornaments dates to circa 600 B.C.E. The Female Figurine was crafted in Ephesus, Turkey, with its numerous, small metal plaques attached to form a dress. The Gold Dress Ornaments appear dirt-encrusted in a photograph recovered from Steinhardt's records. *See* Exhibit 47A. The Female Figurine with Seven Gold Dress Ornaments first surfaced on the international art market on October 31, 2005, when Steinhardt purchased all eight of these antiquities directly from Hecht with no prior provenance for \$499,294. On Hecht's invoice, there is a handwritten note that the objects were "found together." Again, unless an antiquity was discovered pursuant to a scientific and legally authorized excavation, detailed knowledge about that antiquity's "find spot" and how it was found can only be possessed by the looter. *See* Exhibit 47B for the most recent photograph of the Female Figurine with Seven Gold Dress Ornaments. Although Hecht falsely claimed on his invoice to Steinhardt that the Female Figurine and Seven Gold Dress Ornaments was "[his] property," no verifiable provenance for the Female Figurine with Gold Dress Ornaments prior to the 2005 sale from Hecht to Steinhardt has ever been identified

Nude Female Statuette

Dating to circa 2500 B.C.E., the Nude Female Statuette was crafted from bronze and originated in the site of Mari, Syria. A report prepared by the Art Conservation Group in January 2017 notes the “widespread presence of what appears to be burial dirt, light brown to grey in color” on the Nude Female Statuette. The Nude Female Statuette first surfaced on the international art market on December 11, 2003, in the hands of Hecht, who identified the Nude Female Statuette in his invoice to Steinhardt as “Syrian.” This was 8 months after the April 2003 looting of Baghdad’s Iraq Museum—looting that an international investigation led by U.S. Marine Colonel Matthew Bogdanos determined resulted in the theft of more than 10,000 antiquities, to include entire shelves and storage boxes of small statuettes similar to the Nude Female Statuette. It is well-documented that looting of antiquities increases during times of civil unrest and war. When an unprovenanced antiquity appears on the international art market for the first time immediately after geo-political turbulence in its country of origin, therefore, that is often an indication that it has been looted. Appearing on the art market just months after significant reporting in the media of widespread looting in Iraq and Syria during the 2003 Iraq War, the Nude Female Statuette had no prior provenance. Nonetheless, Steinhardt purchased it from Hecht for \$28,000. *See* Exhibit 48 for the most recent photograph of the Nude Female Statuette. Although Hecht falsely claimed on his invoice to Steinhardt that the Nude Female Statuette was “[his] property,” no verifiable provenance for the Nude Female Statuette prior to the 2003 sale from Hecht to Steinhardt has ever been identified

Edward and Samuel Merrin (4 antiquities)

Edward (“Ed”) Merrin (b. 1928) founded Merrin Gallery in 1963 to sell jewelry. In the

late 1960s, Merrin became interested in pre-Columbian art and shifted the gallery to focus on selling antiquities. In 1987, Samuel (“Sam”) Merrin (b. 1963) joined his father’s business. In 1999, Samuel Merrin became the director of the gallery.

According to records seized from convicted antiquities-trafficker Giovanni Franco Becchina by law-enforcement authorities, the Merrin Gallery bought looted antiquities directly from Becchina and even directly from *tombaroli* themselves. Among the records seized from Becchina is a handwritten letter from a *tombarolo* in Sardinia to Becchina. It is unabashedly revealing. In the letter, the *tombarolo* explains that he is writing Becchina to offer him a lucrative new venture. According to the *tombarolo* who wrote the letter, although he had previously offered Edward Merrin in New York the first choice of any looted Sardinian artifacts, the *tombarolo* would like to now offer them to Becchina instead. In a subsequent letter, the same *tombarolo* requested that Becchina shop photos of his looted Sardinian antiquities to important buyers on the U.S. market, including Merrin Gallery, the Met, and the Getty Museum. In a similar letter to George Ortiz, the same *tombarolo* made the same offer. Advertising himself as the “person who is bringing the stuff to Merrin [Gallery] of New York,” the *tombarolo* concluded, “so, Mr. Ortiz, if you pay us the same [amounts], we will bring all the stuff only to you.”

In 2005, both Edward and Samuel were indicted by the Office of the U.S. Attorney for the Southern District of New York (SDNY) on charges of defrauding clients millions of dollars by inflating the cost of antiquities they sold. In 2007, Edward Merrin was sentenced to one year of probation and ordered to pay \$50,000 in fines. That same year, Samuel Merrin entered a deferred prosecution agreement with SDNY and the charges were ultimately dismissed pursuant to that agreement.

Edward Merrin died in 2020, but Samuel Merrin continues to run the gallery. To date, this Office has executed 5 seizures of 21 antiquities trafficked through Merrin.

Stag's Head Rhyton

Depicting a finely wrought stag's head in the form of a ceremonial vessel for libations, the Stag's Head Rhyton was crafted circa 400 B.C.E. in Milas, Turkey. In October 1986, illegal excavations began in Milas prompting the Ministry of Culture and Tourism to conduct emergency excavations in the wake of the rampant looting. Later that same year, the gendarmerie of Milas notified local leaders of community precautions motivated by the illegal excavations and near-complete destruction of the ancient site at Milas. On October 18, 1988, the Ministry of Culture and Tourism again reported on the illegal excavations at Milas and noted antiquities were being smuggled out of Turkey. On May 17, 1990, an anonymous letter was sent by a local resident to the Ministry of Culture and Tourism reporting that illegal excavations had recommenced in Milas. The Stag's Head Rhyton first appeared on the international art market—with no prior provenance—shortly after this rampant looting in Milas. On November 22, 1991, Steinhardt purchased the Stag's Head Rhyton for \$2,600,000 from Merrin Gallery.

Undated handwritten notes recovered from Steinhardt's records for the Stag's Head Rhyton state, "Found in Western Turkey." As discussed previously, detailed knowledge about that antiquity's "find spot" can only be possessed by the looter. It is well-known, therefore, that information from a seller identifying the find spot of an unprovenanced antiquity is often an indication that it has been looted. On May 15, 1992, Dr. Barbara Deppert, an archaeologist and art advisor, wrote to Steinhardt, "I found out that your rhyton was found near Milas on

the western coast of Asia minor.” Twenty-nine years later, Dr. Deppert opined that she might have based her statement about the find spot on parallels to the rhyton or “perhaps on information provided by Robert Haber.” The facts suggest otherwise and Dr. Deppert’s attempt to distance herself from the obvious implications of her original statement is unconvincing. Haber’s well-documented involvement with antiquities traffickers is addressed separately. Moreover, Dr. Deppert sent her 1992 letter from Germany at a time she was connected to Fuad Üzülmöz, a Munich-based Turkish antiquities smuggler with extensive connections to looters in the regions around Milas. Nor was this Dr. Deppert’s first involvement with Haber or looted antiquities. Less than a year earlier, she had advised Steinhardt to purchase from Haber a gold phiale that had been looted from Italy and that Steinhardt ultimately forfeited to Italy. On March 11, 1993, Steinhardt loaned the Stag’s Head Rhyton to the Met, where it remained until this Office applied for and received a warrant to seize the Stag’s Head Rhyton. *See* Exhibit 49 for the most recent photograph of the Stag’s Head Rhyton. No verifiable provenance for the Stag’s Head Rhyton prior to its 1991 sale from Merrin Gallery to Steinhardt has ever been identified.

Syro-Hittite Idols (3)

The three Syro-Hittite Idols appear broken in fragments in a black-and-white photograph that was recovered as the result of a different criminal investigation during the execution of a judicially authorized warrant on New York-based Royal-Athena Galleries. *See* Exhibit 50A. The photograph had been stored by Royal-Athena Galleries’ owner, Jerome Eisenberg, in a folder labeled “STEINHARDT, Michael – to 1997.” Dating to the 2nd millennium B.C.E., the three female Syro-Hittite Idols were crafted in northwest Syria. The

Syro-Hittite Idols first surfaced on the international art market on January 13, 1989, when Steinhardt purchased two of the three idols—antiquities accessioned by Steinhardt as A1989.20 and A1992.30—from Edward Merrin for a total of \$20,000. On October 2, 1992, the third Syro-Hittite Idol surfaced on the international art market with Merrin. That idol (accessioned by Steinhardt as A1992.12) appears dirty, broken into five fragments, and lying on a white sheet in an undated color Polaroid photograph recovered from Steinhardt’s records. *See* Exhibit 50B. In a handwritten note, Edward Merrin wrote, “Got this Polaroid before putting together – shows absolutely that the figures [sic] parts go together (see depression for neck – joining of legs, etc.).” As discussed previously, the advent of color non-peel-apart Polaroid technology in 1972 indicates that this color non-peel-apart post-looting photograph—although undated—could only have been taken after 1972. This same idol (A1992.12) appears partially restored (still missing its left arm) in a photograph that was recovered from the Symes Archive. *See* Exhibit 50C. Merrin Gallery sold Steinhardt this third Syro-Hittite Idol (A1992.12) for \$9,000 with a note, “from the same find as the two you have.” Again, such detailed knowledge about an antiquity’s “find spot,” how it was found, and especially what other antiquities it was found with, can only be possessed by the looter. It is well-known, therefore, that such information from a seller is often an indication that those antiquities have been looted. *See* Exhibit 50D for the most recent photograph of the Syro-Hittite Idols. No verifiable provenance for the Syro-Hittite Idols prior to their respective 1989 and 1992 sales from Merrin Gallery to Steinhardt has ever been identified.

Robert Haber (2 antiquities)

Robert Haber (b. 1947) is an antiquities dealer born in New York who has been

operating his gallery, Robert Haber & Associates Ancient Art, in New York City since 1982. In 1986, Haber sold a “Celtic bronze dagger and scabbard” to a private New York collector, who later consigned it to Christie’s for sale. In fact, the dagger and scabbard had been looted from Italy by convicted trafficker Giovanni Franco Becchina. In 2002, Haber sold another Becchina-trafficked antiquity a Minoan larnax, dated to the 14th century B.C.E. to the Michael C. Carlos Museum at Emory University.

In the late 1980s, Haber began selling millions of dollars’ worth of antiquities to Steinhardt. According to Steinhardt himself, “the majority of the items I purchased [from Haber] did not have provenance.” For example, in 1991, Haber sold Steinhardt a hammered gold bowl from Sicily, dated to ca. 450 B.C.E., for more than \$1 million. In 1995, the Office of the U.S. Attorney for the Southern District of New York (SDNY) seized the antiquity from Steinhardt, alleging that it had been looted from Caltavuturo, Sicily, and then smuggled out of Italy via Switzerland. In a 1997 forfeiture proceeding, Judge Barbara S. Jones found that Haber himself “took great effort to ensure that the [gold bowl] was not exported directly from Italy.” Indeed, despite seeing the gold bowl in person in Sicily, Haber flew to Lugano, Switzerland, in order to take possession. Then he carried the looted gold bowl first to Zurich and then to Geneva before flying it to New York. On customs forms, he misidentified its country of origin as Switzerland, rather than Italy. Judge Jones noted that “truthful identification of Italy on the customs forms would have placed the Customs Service on notice that an object of antiquity, dated 450 B.C., was being exported from a country with strict antiquity protection laws.” Accordingly, Judge Jones ordered the repatriation of the antiquity to Italy.

The 74-year-old Haber continues to operate his gallery in New York. To date, this Office has executed three seizures of three antiquities trafficked by Haber.

Orpheus Mosaic

The Orpheus Mosaic appears in a Polaroid photograph faxed on July 19, 1991 by a Geneva-based transportation company Mat Securitas to Robert Haber and recovered from Steinhardt's records. *See* Exhibit 51A. Depicting the ancient musician Orpheus strumming his lyre while surrounded by lions, rams, and other animals, the Orpheus Mosaic dates to circa 100 C.E. and once adorned a Roman villa in Sicily. The Orpheus Mosaic first surfaced on the international art market in 1991, when Robert Haber arranged for the Orpheus Mosaic to be shipped from Geneva to the United States on consignment for "Michael Steinhardt." The path taken by Haber for the Orpheus Mosaic parallels that of the looted phiale (forfeited by Steinhardt to Italy in 1997), which was acquired from a Sicilian source and smuggled through Switzerland to New York. On October 1, 1991, Steinhardt paid Haber \$440,000 for the Orpheus Mosaic. Once in the United States, the Orpheus Mosaic was immediately transported to Ethos, a California-based restoration group, who described condition of the Orpheus Mosaic in 1992:

The mosaic was cut into five sections in order to simplify lifting it from its original site. For the most part, the figures were avoided when the cuts were made, with the exception of incisions which run through the goat and Orpheus' lyre. Judging from their ragged appearance, the cuts were made with chisels...In addition, as the mosaic was lifted, unskilled manipulation of the blades used to detach the sections (combined with an evident lack of any facing material) caused cracks and breaks.

The "unskilled" and "incompetent" removal of the object described in the report is consistent with its looting of the mosaic from its "original site" since chisels and saws are the tools of the trade for *tombaroli*. Although the looters may have been "incompetent," the breaks

themselves (with four of the five cuts being *between* the human figures) further prove they were intentional. Such a pattern of deliberate breakage is distinct from the type of random fragmentation usually seen in artifacts due to the passage of time. Thus, this illustrates the looting practice of “orphans” referred to earlier in which looters and smugglers often intentionally break large statues into smaller pieces to ease transport and avoid detection by customs and other law-enforcement officials. When an unprovenanced antiquity—such as the Orpheus Mosaic—appears in such strategically made fragments, therefore, it is often an indication that it has been looted. In 2021, after providing notice to this Office, Steinhardt consigned the Orpheus Mosaic for \$800,000 to Phoenix Ancient Art, where this Office later seized it. *See* Exhibit 51B for the most recent photograph of the Orpheus Mosaic. No verifiable provenance for the Orpheus Mosaic prior to the 1991 sale from Haber to Steinhardt has ever been identified.

Anatolian Terracotta Idol

The Anatolian Terracotta Idol, dating to 5000-4000 B.C.E., was crafted in Hacilar, Turkey and depicts a Neolithic female figurine. Terracotta goddess figures consistent with the form, size, and material of the Anatolian Terracotta Idol have thus far been found only in Hacilar, Turkey. First surveyed by a British archaeological team in 1960, Hacilar began to suffer rampant looting by local Turkish villagers as soon as the British left. On March 6, 1963, for example, the Gendarmerie Commander of the region wrote that the villagers set up a system where a designated “spotter” stood on lookout for approaching authorities and sent out a signal to the diggers if any such authority was observed. Despite the law-enforcement efforts, the villagers kept conducting the excavations, according to the Commander, “day and night.” On September

29, 1965, the National Security General Secretariat sent a letter to the Ministry of the Interior requesting increased additional security at Hacilar, noting that once the looters found any antiquities, they sent them to Istanbul and İzmir, where criminal networks smuggled them abroad. These activities continued until October 1964, when a guard was stationed at Hacilar. The letter warned however, that authorities did not know “how long the present silence will continue.” After this rampant and relentless looting, the Anatolian Terracotta Idol first surfaced on the international art market in 1975, when the British Rail Pension Fund purchased the Anatolian Terracotta Idol, with no prior provenance—at a Sotheby’s London auction. On February 1, 1990, Robert Haber purchased the Anatolian Terracotta Idol from the British Railway Pension Fund. On August 19, 1990, Steinhardt purchased the Anatolian Terracotta Idol from Haber for \$79,610. *See* Exhibit 52 for the most recent photograph of the Anatolian Terracotta Idol. The Anatolian Terracotta Idol has no verifiable provenance prior to the 1975 sale from Sotheby’s London to the British Rail Fund.

Eugene Alexander (7 antiquities)

Eugene Alexander, a/k/a Evgeni Svetoslavov Mutaftchiev (b. 1956), rose from appearing on Bulgarian television stations to directing international money-laundering schemes for looted antiquities. Born in Varna, Bulgaria, Alexander grew up along the Black Sea. In 1979, Alexander began reporting for a local television station in Varna before taking a position in public relations at Varna’s National Archaeological Museum. Alexander left Varna in 1984 and began working as an “art and antiquity investment consultant” in Munich, Germany. In 1988, he left Germany to pursue a Master’s in Art History at Cleveland State University, continuing his studies in 1989 at New York University (NYU), where he ultimately

completed a doctorate in ancient Greek and Roman History.

According to law-enforcement authorities, Alexander and his father (a Bulgarian diplomat to Costa Rica) began to leverage their connections to senior government officials and TIM, which—according law-enforcement authorities and the U.S. State Department—is an organized crime syndicate incorporated as a holding company based in Varna. In 1999, Alexander contacted German law-enforcement authorities to report that a former business associate, Todor Iwanov, was trafficking in antiquities. The subsequent investigation revealed that both Alexander and Iwanov were trafficking in illegal antiquities before their falling out. Then, according to a Bulgarian news report published on December 29, 2003, Alexander claimed to have been abducted by members of an organized-crime group that demanded \$1 million for his return, but he managed to escape—still in handcuffs—in Sofia.

In 2004, German law-enforcement authorities executed a search warrant at Alexander's residence in Munich, seizing antiquities (ultimately returned to Alexander) and documents. The latter revealed the general structure of Alexander's antiquities-trafficking operation, wherein local looters operating in Eastern Europe and the Mediterranean sent Alexander photos of freshly excavated antiquities. Once Alexander determined he wanted an antiquity, it would be smuggled into Germany where Alexander would often have the antiquity restored by Flavio Bertolin and tested using Thermoluminescence (TL) Analysis by Ralf Kotalla—the same individual who often supplied notorious trafficker Giovanni Franco Becchina with TL Analysis reports. Because prior published provenance is often the only way to prove an antiquity's authenticity (as well as its legality), Alexander used this testing to establish that the antiquities he was selling without any provenance were nonetheless authentic.

Alexander then sold the antiquities to collectors in Europe and the United States, using a series of shell corporations and off-shore banks for payment. One of these banks, based in Malta, was SATABANK. According to the Maltese register of business, SATABANK was wholly owned by two entities (Christo Giorgiev and a private limited company), with Alexander being a 19.8% owner of SATABANK. In 2020, the European Central Bank revoked SATABANK's banking license due to an on-going investigation into its money laundering. In 2021, Alexander opened four accounts at Cooperative Bank Bulgaria, a financial institution connected to TIM. Alexander is currently the subject of criminal investigation in at least one foreign jurisdiction.

Alexander sold his first antiquity to Steinhardt in 2006. Beginning in 2008, Alexander requested that Steinhardt pay Alexander through Etablissement Finagran, a financial entity headquartered in Lichtenstein. A "Finagran" is a specific form of limited liability arrangement in Germany, Switzerland, and Lichtenstein, which allows shareholders to take over an existing company and replace the shareholders, making public only the trustee of the company. Then, starting in 2012, Alexander requested that Steinhardt pay Alexander through E.E. Capital Ltd, a financial entity headquartered in St. Helier, Jersey. E.E. Capital Ltd.'s primary shareholder was a shell corporation managed by the same Christo Giorgiev who co-owned SATABANK. Finally, in 2015, Alexander requested that Steinhardt switch his payments to Alexander to Fine Arts Management (FAM) Services, an off-shore company headquartered in the Seychelles.

The 65-year-old Alexander remains at large in Germany. To date, this Office has executed two seizures of seven antiquities trafficked by Alexander.

Larnax

The Larnax, a small chest for human remains, appears broken into several large fragments in a photograph recovered from Steinhardt's files. *See* Exhibit 53A. The Larnax features painted aquatic figures and was crafted in the ancient workshops at Rethymnon in eastern Crete between 1400-1200 B.C.E. Over the last twenty years, Rethymnon has been subjected to widespread looting. The Larnax first surfaced on the international art market immediately after these reports of looting on April 12, 2014, when Flavio Bertolin (b. 1965) a Munich-based restorer began reconstructing the Larnax from fragments. This is another example of the looting practice of "orphans" referred to earlier in which looters and smugglers often intentionally break large statues into smaller pieces to ease transport and avoid detection by customs and other law-enforcement officials. The reconstruction work appears to have been completed by Bertolin on March 16, 2016. On April 22, 2016, Ralf Kotalla performed a Thermoluminescence test (TL)—a procedure done to evaluate the authenticity of an antiquity—in Haigerloch, Germany, concluding that the Larnax was Minoan and 3300 years old (+/-20%). Kotalla often conducted the same testing on looted antiquities for convicted antiquities-trafficker Giovanni Franco Becchina.

On October 15, 2016, Steinhardt paid Seychelles-based FAM Services (via SATABANK as Alexander instructed) \$575,000 for the Larnax. On May 31, 2017, during the investigation of the looted Calf Bearer that was ultimately seized and returned to Lebanon, Steinhardt was complaining to Special Agent John Paul Labbat about a subpoena from this Office that was being served requesting provenance documentation. Scoffing at the subpoena, Steinhardt pointed to the Larnax, saying, "you see this piece? There's no provenance for it. If

I see a piece and I like it, then I buy it.” See Exhibit 53B for the most recent photograph of the Larnax. No verifiable provenance for the Larnax prior to the 2016 sale from Alexander to Steinhardt has ever been identified.

Looted Antiquities from Naxos

One of nearly thirty islands clustered in the southwestern Aegean Sea, Naxos is famed for its marble Neolithic artifacts, which have often been the target of looting. Indeed, according to numerous contemporaneously prepared police reports from 2004, 2012, and 2014, archaeological sites in Naxos—including Cycladic tombs—have been repeatedly and continuously looted. As previously discussed, specific regions or areas are often the subject of targeted looting due to insufficient security, active scientific excavations temporarily shutting down for the season, or increased demand for a recently discovered object. The sudden appearance of an unprovenanced antiquity (or group of antiquities) on the international art market for the first time after reports of looting of that specific type of antiquity from the area in which its type originated, therefore, is often an indication that it has been looted. Following the looting on Naxos, Steinhardt purchased five Naxian antiquities from Alexander between 2010 and 2014. These five were trafficked by Alexander as follows.

Idol

Depicted with incised folded arms, the Idol dates to 2400 B.C.E., and was buried in the ancient necropolis of Spedos on the island of Naxos. Such folded-arm idols were produced during the Early Cycladic II period (2800-2200 B.C.E.). The first appearance of the Idol on the international art market was during the period of looting on Naxos: on December 15, 2010, Steinhardt purchased the Idol from Alexander with no prior provenance for \$100,000. Per

Alexander's instructions, Steinhardt paid for the Idol through Lichtenstein-based Establishment Finagran. *See* Exhibit 54 for the most recent photograph of the Idol. Although Alexander falsely claimed on his invoice to Steinhardt that he had "legal and equitable title" to the Idol, no verifiable provenance for the Idol prior to the 2010 sale from Alexander to Steinhardt has ever been identified.

Plate

Crafted from marble, the Plate features faint traces of red pigment and dates to circa 1200 B.C.E. Plates of this type, dimension, and form have been found in tombs in Naxos, particularly the Naxian sites of Aghioi Anargyroi, Aplomata, Phiontas, and Tsikniades. The first appearance of the Plate on the international art market was during the period of looting on Naxos: on November 6, 2012, Steinhardt purchased the Plate from Alexander with no prior provenance for \$15,000. Per Alexander's instructions, Steinhardt paid for the Plate through E.E. Capital Ltd, a Jersey-based corporation. *See* Exhibit 55 for the most recent photograph of the Plate. Although Alexander falsely claimed on his invoice to Steinhardt that the Plate was "not stolen from a religious institution, museum, or archaeological site," no verifiable provenance for the Plate prior to the 2012 sale from Alexander to Steinhardt has ever been identified.

Kandila

Crafted from warm-hued marble hewn from Naxian quarries, the Kandila (a type of ancient vessel whose name comes from the similarity in appearance to modern Greek church-lamps) dates to the Protocycladic Period (3200-2800 B.C.E.). The only known parallel to the Kandila comes from the Naxian archaeological site of Apeiranthos. The first appearance of the Kandila on the international art market was during the period of looting on Naxos: on

November 6, 2012, Steinhardt purchased the Kandila from Alexander with no prior provenance for \$75,000. Per Alexander's instructions, Steinhardt paid for the Kandila through Jersey-based E.E. Capital Ltd. *See* Exhibit 56 for the most recent photograph of the Kandila. Although Alexander falsely claimed on his invoice to Steinhardt that the Kandila was "not stolen from a religious institution, museum, or archaeological site," no verifiable provenance for the Kandila prior to the 2012 sale from Alexander to Steinhardt has ever been identified.

Cycladic Cup

Crafted from white marble, the Cycladic Cup dates to circa 2200-1800 B.C.E. Most of the known examples of the Cycladic Cup have been found on Naxos and that the only known parallels come from Naxian cemeteries. The first appearance of the Cycladic Cup on the international art market was during the period of looting on Naxos: on February 20, 2013, Steinhardt purchased the Cycladic Cup from Alexander with no prior provenance for \$20,000. Per Alexander's instructions, Steinhardt paid for the Cycladic Cup through Jersey-based E.E. Capital Ltd. *See* Exhibit 57 for the most recent photograph of the Cycladic Cup. Although Alexander falsely claimed on his invoice to Steinhardt that the Cycladic Cup was "not stolen from a religious institution, museum, or archaeological site," no verifiable provenance for the Cycladic Cup prior to the 2013 sale from Alexander to Steinhardt has ever been identified.

Cycladic Plate

A dark marble plate dating to circa 1200 B.C.E., the Cycladic Plate originated on the island of Naxos. Specifically, the Cycladic Plate is consistent with vessels recovered during legal excavations at cemeteries and settlements in Naxos. The first appearance of the Cycladic Plate on the international art market was during the period of looting on Naxos: on April 9, 2014,

Steinhardt purchased the Cycladic Plate from Alexander with no prior provenance for \$10,000. Per Alexander's instructions, Steinhardt paid for the Cycladic Plate through Jersey-based E.E. Capital Ltd. *See* Exhibit 58 for the most recent photograph of the Cycladic Plate. No verifiable provenance for the Cycladic Plate prior to the 2014 sale from Alexander to Steinhardt has ever been identified.

Bronze Griffin Protome

Crafted from bronze circa 600-500 B.C.E., the Bronze Griffin Protome features a pronounced eyebrow, convex beak with a small incision, and spiral on its neck and originates from the sanctuary of Hera in Samos, a Greek island in the eastern Aegean Sea. The Bronze Griffin Protome depicts the torso and head of the mythical griffin and would have adorned a vessel, cauldron, or fixture in antiquity. The Temple of Hera has been worshipped for millennia and protected by Greece's patrimony law for nearly 100 years. Yet, the Bronze Griffin Protome first surfaced on the international art market on November 6, 2012, when Steinhardt purchased it from Alexander with no prior provenance for \$350,000. Per Alexander's instructions, Steinhardt paid for the Bronze Griffin Protome through Jersey-based E.E. Capital Ltd. *See* Exhibit 59 for the most recent photograph of the Bronze Griffin Protome. Although Alexander falsely claimed on his invoice to Steinhardt that the Bronze Griffin Protome was "not stolen from a religious institution, museum, or archaeological site," no verifiable provenance for the Bronze Griffin Protome prior to the 2012 sale from Alexander to Steinhardt has ever been identified.

Fritz and Harry Bürki (1 antiquity)

Fritz (father b. 1930) and Harry Bürki (son b. 1953) were Zurich-based restorers of

looted antiquities in Giacomo Medici and Giovanni Franco Becchina's worldwide antiquities-trafficking ring. At Medici's 2004 trial in Italy, there was abundant evidence that Medici often delivered his looted antiquities to the Bürkis for restoration, thereby eliminating traces of recent excavation. The Bürkis also jointly bought antiquities with Medici and Paris-based dealer (and trafficker) Robert Hecht for sale in Europe and the United States. Medici provided the Bürkis with Italian material, but Hecht provided them with Turkish antiquities. As discussed previously, Hecht was arrested, charged, and ultimately declared persona non-grata in Turkey.

Italian police authorities came to know Harry Bürki for his involvement in the sale of the famous Euphronios Krater, in the early 1970s. After Robert Hecht (called "Bob the American" by *tombaroli*) purchased the krater, he brought it to Bürki in Zurich for restoration. Once restored, Hecht sold the Euphronios Krater to the Met for one million dollars. In 2008, the Met returned it to Italy.

After Italian and Swiss authorities raided Medici's Geneva warehouses in 1995, they began investigating his co-conspirators, including the Bürkis. In 1997, Steinhardt loaned Harry Bürki \$300,000 and another \$150,000 the following year. On October 9, 2001, Swiss and Italian law-enforcement officers and a Zurich magistrate raided the Bürkis' apartment and their annexed workshop on the fourth floor of a building near the railway station. They found 561 antiquities: 337 in the workshop and 224 in the apartment. Later the same day, antiquities experts Dr. Daniela Rizzo and Maurizio Pellegrini examined the antiquities in the apartment and workshop—ultimately concluding that 520 of the 561 antiquities had been looted from Italy. The Swiss magistrate permitted law-enforcement authorities to photograph and video-

record the antiquities and he ordered their “seizure in place”—prohibiting the Bürkis from remove any antiquities. But he did not authorize their removal by the Swiss or Italian officers. Thus, when law-enforcement authorities completed the warrant, they left all the antiquities behind, maintaining only the photographs and video recordings—now commonly referred to as the “Bürki Archive.” In a sworn deposition to Swiss authorities that same day, Fritz Bürki admitted that he knew that most of the objects he had been asked to restore were illegal, often pretending such antiquities were part of their family heritage.

On March 27, 2008, the Italian judge issued an Order forfeiting the 520 antiquities as authentic antiquities illegally excavated in Italy. But all criminal charges against the Bürkis were dismissed due to the running of the statute of limitations. On November 21, 2008, a Swiss judge affirmed the Forfeiture Order, and ordered the 520 antiquities returned to Italy. When the Swiss police executed the Italian forfeiture order, however, they were only able to seize 132 antiquities, because the Bürkis had already removed the remaining 388 to an unknown location. Many of those remain missing, but the Carabinieri added the corresponding photographs in their database of stolen antiquities.

Fritz Bürki died in Zurich in 2015, but the 68-year-old Harry Bürki remains at large in Switzerland. To date, this Office has executed six seizures of six antiquities trafficked by the Bürkis.

Small Anatolian Limestone Idol

Dating to circa 2500 B.C.E., the Small Anatolian Limestone Idol depicts a stylized nude female figure crafted of near-translucent limestone. The Small Anatolian Limestone Idol is of the “Kilia” type, a style of antiquities created by an ancient Anatolian civilization outside the

modern-village of Kulaksizlar, Turkey. All the raw materials used in these Kulaksizlar Kilia idols were sourced from the immediate vicinity of the site. In 1991, Kilia idols were discovered in Kulaksizlar. Reports of looting soon followed. According to a letter dated November 3, 1994, from Dr. Rafael Dinic, an archaeologist working near Kulaksizlar, “illegal excavations and collecting and selling idols from the surface have reached the highest level.” According to a letter dated February 25, 2000, this activity continued into early 2000, as Turkish gendarmeries continued to seize fragments of idols recovered in the region where Kulaksizlar was located. Shortly after these last reports of looting, the Small Anatolian Limestone Idol first surfaced on the international art market on April 30, 2002, when Steinhardt purchased the Small Anatolian Limestone Idol from Harry Bürki with no prior provenance for \$47,500. Here, Bürki falsely claimed on his invoice to Steinhardt that the Small Anatolian Limestone Idol was “exported legally from its country of origin.” *See* Exhibit 60 for the most recent photograph of the Small Anatolian Limestone Idol. No verifiable provenance for the Small Anatolian Limestone Idol prior to the 2002 sale from Bürki to Steinhardt has ever been identified.

Gil Chaya (30 antiquities)

Gil Chaya (b. 1961) is an Israeli antiquities dealer. Chaya initially sold pearls in Switzerland with his father, Joseph, but in 1999, started Biblical Antiquities Ltd, with his then-wife, Lisa, in Jerusalem. That same year, the Israel Antiquities Authority (IAA) issued Gil Chaya license #260 to buy and sell antiquities—but in 2008, that license expired and was never renewed. In early 2006, Gil and Lisa Chaya divorced. But before they did, they trafficked in illegal antiquities from Israel to the United States.

According to Israeli law-enforcement authorities who interviewed Lisa Chaya, Gil

Chaya, and other traffickers, and as confirmed by documents seized from Steinhardt's apartment, Gil and Lisa Chaya had a robust trade in illegal antiquities. Gil Chaya would buy illegal antiquities from local looters in and around Israel, usually from the West Bank, Gaza, and East Jerusalem. As detailed more fully below (as the evidence is presented for each antiquity), files seized from Steinhardt illustrate that Gil Chaya bought directly from looters. For example, after Steinhardt had directed his curator to get more information about a particular antiquity, Lisa Chaya wrote to Steinhardt that Gil had "repeatedly requested" that the "peasants" look for a missing part of an antiquity lost during the looting. For other antiquities—and again as detailed below—the seized material contains emails in which the Chaya's repeated to Steinhardt's employees the conversations they had with the looters and middlemen regarding exactly where they had found the antiquities. Such detailed knowledge about an antiquity's find spot can only be possessed by excavators operating as part of a scientific excavation—which these were certainly not—or by the looters themselves.

After receiving the freshly looted material, Gil Chaya would also arrange for the antiquities to be cleaned and restored, frequently doing it himself. They would then photograph the antiquities prior to any restoration. Israeli law-enforcement authorities took possession of several of these photographs depicting antiquities covered in encrustations or broken in several pieces. Such photographs and videos of dirty or damaged antiquities are often maintained by looters and sellers to prove the antiquity's authenticity to skeptical buyers under the logical theory that "if it's looted, it's real." Then, Gil Chaya would clean the object. Indeed, on one occasion, Gil Chaya cleaned a dirty antiquity in a New York City hotel bathtub before bringing it to Steinhardt's apartment. Also, Gil Chaya would sometimes

combine pieces from multiple antiquities to make a single, more valuable one. The Chaya's would also transport the antiquities to New York for sale. Gil Chaya would carry illegal antiquities to the United States so frequently that the pair took separate flights for fear of being caught.

For example, in 2006, Chaya smuggled ten antiquities from Egypt and Israel into New York for sale at an auction at Christie's. Of these, at least one—an alabaster duck from the third millennium B.C.E.—had been stolen from an archaeological storage facility in Saqqara, Egypt, shortly after it had been discovered and photographed in 1979. It was seized by Homeland Security Investigations officials and repatriated to Egypt in 2007.

The 60-year-old Chaya remains at large in Israel. To date, this Office has executed 2 seizures of 30 antiquities trafficked by Chaya.

Antiquities Looted from Israel

Pursuant to the 1993 Oslo Accords, the Government of Israel and the Palestine Liberation Organization (PLO) identified three sectors—Areas A, B, and C—of the West Bank and the Gaza Strip. Specifically, Area A, covered major cities under Palestinian control; Area B, covered the area over which there was to be joint control (Israeli control of security, Palestinian control of civilian issues); and Area C, covered the area over which there was to be full Israeli control. For each of the following Chaya-trafficked antiquities, the looting took place either at an area within Israel's borders or at an area over which Israel exercises legal authority. Each antiquity was smuggled through and also illegally exported from Israel.

Carved Ivory Head (Larger)

Dating to 1300-1200 B.C.E. and measuring 1.75 inches tall, the Carved Ivory Head

(Larger) originated in Tel Dothan, an archaeological site rich in Middle and Late Bronze Age material. The Carved Ivory Head (Larger) appears broken, pitted, and dirt-encrusted in a photograph recovered by Israeli law enforcement. *See* Exhibit 61A. A letter from Gil Chaya recovered from Steinhardt's records describes the looting of the Carved Ivory Head (Larger):

[The piece was] said to have been found with the complete body – a full ivory statue, unique. The 'peasants' who found it said they 'tried to glue the (wet) body back together; but because they were ignorant of it's (sic) importance and value as well as the fact that professionals might have been able to restore it, they threw the body away when they could not fix it and just kept the head. Of course, we asked them repeatedly to try to recover the body, but they could not & it is presumed lost.

The Carved Ivory Head (Larger) first surfaced on the international art market on November 27, 2003, when Steinhardt purchased it from Gil Chaya with no prior provenance for \$25,000. *See* Exhibit 61B for the most recent photograph of the Carved Ivory Head (Larger). No verifiable provenance for the Carved Ivory Head (Larger) prior to the 2003 sale from Gil Chaya to Steinhardt has ever been identified.

Carved Ivory Head (Smaller)

The Carved Ivory Head (Smaller) appears caked with dirt in a photograph recovered by Israeli law enforcement. *See* Exhibit 62A. Dating to circa 700 B.C.E. and measuring 1.5 inches tall, the Carved Ivory Head (Smaller) depicts an intricately carved figure sporting a diadem and was found in Samaria. According to a letter from Gil Chaya recovered from Steinhardt's records, the Head was "found in Sebaste, capital of Samaria, near the Israelite royal Palace (Omri's Palace)." As discussed previously, unless an antiquity was discovered pursuant to a scientific and legally authorized excavation, detailed knowledge about that antiquity's "find spot" and how it was found can only be possessed by the looter. It is well-known, therefore, that information from a seller identifying the find spot of an unprovenanced

antiquity is often an indication that it has been looted. The Carved Ivory Head (Smaller) first surfaced on the international art market on November 27, 2003, when Steinhardt purchased it from Gil Chaya with no prior provenance for \$15,000. *See* Exhibit 62B for the most recent photograph of the Carved Ivory Head (Smaller). No verifiable provenance for the Carved Ivory Head (Smaller) prior to the 2003 sale from Gil Chaya to Steinhardt has ever been identified.

Red Carnelian Sun Fish Amulet

A small red fish carved from carnelian, a brownish-red glassy mineral, the Red Carnelian Sun Fish Amulet dates to circa 600 B.C.E. and originated in El Kom. Steinhardt's records contain an email from "Gil Chaya" ("gilchaya@actcom.co.il") to Steinhardt's then-Collection Manager describing the find spot for the Red Carnelian Sun Fish Amulet, "This red fish was found in ""El Khom" it is not very far from Hebron." As discussed previously, unless an antiquity was discovered pursuant to a scientific and legally authorized excavation, detailed knowledge about that antiquity's "find spot" and how it was found can only be possessed by the looter. It is well-known, therefore, that information from a seller identifying the find spot of an unprovenanced antiquity is often an indication that it has been looted. Indeed, the illicit excavation of the Red Carnelian Sun Fish Amulet is confirmed by a second print-out of an email in Steinhardt's records, from "lisa and gil chaya" ("gilchaya@actcom.co.il") to Steinhardt's then-Collection Manager describing the looting:

I asked Gil about the fish

[Gil] bought it from an East Jerusalem Palestinian wholesaler, middleman, who buys from diggers, mostly in the West Bank area, Hebron, Bethlehem, Samaria...

All he would tell Gil, and Gil pushed, was that it came from an "Iron Age" area, and he promised

that much. We will press him for more information now but it's a delicate thing; the wholesalers are worried will go around them and cut them out, go directly to the sources, the diggers we know in that area to find more stuff.

The Red Carnelian Sun Fish Amulet first surfaced on the international art market on June 26, 2001, when Steinhardt purchased the Red Carnelian Sun Fish Amulet from Gil Chaya with no prior provenance for \$6,818. In 2017, Steinhardt consigned the Red Carnelian Sunfish Amulet for sale to Alan Safani, owner of Safani Gallery. *See Exhibit 63* for a recent photograph of the Red Carnelian Sun Fish Amulet. No verifiable provenance for the Red Carnelian Sun Fish Amulet prior to the 2001 sale from Gil Chaya to Steinhardt has ever been identified. Although the antiquity did not sell in 2018, and this Office received a search warrant to seize it, neither this Office nor Steinhardt has been able to locate the Red Carnelian Sun Fish Amulet. As soon as it is located, it will be seized pursuant to this investigation.

Cosmetic Spoon

Carved from ivory, the Cosmetic Spoon dates to circa 800-700 B.C.E. and features a winged creature surrounded by a finely detailed border. Ritual cosmetic spoons were used in antiquity to ladle incense onto fires as offerings to the gods or the dead. According to an email, from “Lisa” (“gilchaya@bezqint.net”) to Steinhardt’s then-Collection Manager recovered from Steinhardt’s files, the “Cosmetic Spoon is from the Hebron area, a place called El Kom, Gil says, this is the area of the richest Iron age Jewish tombs (many royal).” As discussed previously, unless an antiquity was discovered pursuant to a scientific and legally authorized excavation, detailed knowledge about that antiquity’s “find spot” and how it was found can only be possessed by the looter. Information from a seller identifying the find spot—in this case the same spot as the looted Red Carnelian Sun Fish Amulet—of an unprovenanced antiquity is an

indication that it has been looted. The Cosmetic Spoon first surfaced on the international art market on January 21, 2003, when Steinhardt purchased the Cosmetic Spoon from Gil Chaya with no prior provenance for \$6,000. *See* Exhibit 64 for the most recent photograph of the Cosmetic Spoon. Although Chaya listed his dealer's license in his invoice to Steinhardt, Chaya never registered the Cosmetic Spoon (as required by Israeli law), and no verifiable provenance for the Ivory Spoon prior to the 2003 sale from Gil Chaya to Steinhardt has ever been identified.

Pin with Hand Holding Olive Wreath

A bronze pin in the shape of an extended hand with a wreath, the Pin with Hand Holding Olive Wreath was a votive offering dating to circa 350-300 B.C.E. and was found in Samaria. According to a letter from Gil Chaya recovered from Steinhardt's records, the Pin was

Found in Samaria, near Sebaste, in the bottom of an ancient well; this site yielded about 500 bone cosmetic sticks, many also with hands, as well as 7 marble feet, all Hellenistic period. We therefore assume this well was a water source known for it's (sic) curative waters (especially, it seems, known for healing hands and feet), to which pilgrims made offerings in hope of restoring good health.

As discussed previously, unless an antiquity was discovered pursuant to a scientific and legally authorized excavation, detailed knowledge about that antiquity's "find spot" and how it was found can only be possessed by the looter. Information from a seller identifying the find spot of an unprovenanced antiquity is an indication that it has been looted. The Pin with Hand Holding Olive Wreath first surfaced on the international art market on November 27, 2003, when Steinhardt purchased it from Gil Chaya with no prior provenance for \$2,500. *See* Exhibit 65 for the most recent photograph of the Pin with Hand Holding Olive Wreath. No verifiable provenance for the Pin with Hand Holding Olive Wreath prior to the 2003 sale from Gil

Chaya to Steinhardt.

Sword

The Sword appears broken and encrusted in a photograph recovered from Steinhardt's files. *See* Exhibit 66. The iron sword, dating to circa 650 B.C.E., was found in Samaria. Handwritten notes on the photograph of the Sword recovered from Steinhardt's files describe, "found in Samaria, Israel in royal or VIP tomb" and "found with varied rich goods." As discussed previously, unless an antiquity was discovered pursuant to a scientific and legally authorized excavation, detailed knowledge about that antiquity's "find spot" and how it was found—including what other antiquities it was found with—can only be possessed by the looter. It is well-known, therefore, that information from a seller identifying the find spot of an unprovenanced antiquity is often an indication that it has been looted. The Sword first surfaced on the international art market on June 29, 2005, when Steinhardt purchased the Sword from Gil Chaya with no prior provenance for \$30,000. Although Chaya falsely claimed the Sword was "imported officially and legally into USA," no verifiable provenance for the Sword prior to the 2005 sale from Gil Chaya to Steinhardt has ever been identified. Although this Office received a search warrant to seize the Sword, neither this Office nor Steinhardt has been able to locate the Sword. As soon as the Sword is located, it will be seized pursuant to this investigation.

Ivory Set (16)

Crafted from ivory, bone, hippopotamus teeth, and terracotta, the Ivory Set comprises nine pomegranate scepters and six Iron Age pomegranate pendants dating to 1300-900 B.C.E. and originating in Samaria. The "pomegranate" represented a significant cultic object in

ancient Levantine communities, where the fruit symbolized righteousness, knowledge, and wisdom. Photographs recovered from Steinhardt's records depict the 16 Ivory Set antiquities alongside handwritten find spots, indicating that some antiquities were "found in Samaria" or others "found in Judea." As discussed previously, such detailed knowledge about an antiquity's find spot when it is not the result of a scientific or legal excavation can only be possessed by the looter. The Ivory Set first surfaced on the international art market on September 21, 2006, when Steinhardt purchased the set from Gil Chaya with no prior provenance for \$45,000. Chaya's invoice notes the antiquities were "from Israel." *See* Exhibit 67 for the most recent photograph of the Ivory Set. No verifiable provenance for the Ivory Set to the 2006 sale from Gil Chaya to Steinhardt has ever been identified. Although this Office received a search warrant to seize the entire Ivory Set, neither this Office nor Steinhardt has been able to locate 7 of 16 antiquities in the Ivory Set to this day. As soon as these antiquities are located, they will be seized pursuant to this investigation.

Death Masks (3)

The Death Masks appear soil-encrusted and covered in dirt in photographs recovered by Israeli law-enforcement authorities. *See* Exhibit 68A. Dating circa 6000 to 7000 B.C.E., the Death Masks were crafted from stone and originated in the foothills of the Judean mountains, most likely in the Shephelah in Israel. The Death Masks first surfaced on the international art market on or around December 2006 when Gil Chaya invited [Redacted] to a Jerusalem warehouse to view the antiquities. This is the same warehouse where [Redacted] had seen the looted Heliodorus Stele, which will be discussed separately. When examined by the expert, the death masks had, "soil that still existed in several locations," as well as "sediment." According

to an email dated July 16, 2007, from “Gil Chaya” (“chayagil@bezeqint.net”) to “Michael Steinhardt,” titled “Att: Micheal [sic] URGENT !!!,” recovered from Steinhardt’s records, Chaya sent Steinhardt copies of photographs depicting the Death Masks soil-encrusted and covered in dirt. On October 29, 2007, Steinhardt purchased the Death Masks from Gil Chaya with no prior provenance for \$400,000. An invoice from Gil Chaya notes, “3 Neolithic [sic] stone death masks from Israel.” A second invoice from Gil Chaya to Steinhardt includes the false provenance, “from the Joseph Collection Geneva,” a reference to Gil Chaya’s father Joseph Chaya, and the statement that the Death Masks were “found in Israel over 100 hundred [sic] years old.” *See* Exhibit 68B for the most recent photograph of the Death Masks. No verifiable provenance for the Death Masks prior to their 2006 appearance with Gil Chaya has ever been identified.

Stone Skull

The Stone Skull appears with soil and pronounced encrustations in a photograph recovered from Steinhardt’s records. *See* Exhibit 69A. Dating to circa 7,000 B.C.E., the Stone Skull depicts a human skull or mythological creature. Through analyzing the isotopes and soil still on the artifact, [Redacted] determined it may have been found in the Arad Valley or north towards the Hebron Mountains. In an interview with law-enforcement authorities, Gil Chaya admitted that he purchased the Stone Skull in the 1990s from a Palestinian dealer in Beit Omar near Hebron. The Stone Skull first surfaced on the international art market on November 5, 2009, when Steinhardt purchased the Stone Skull from Gil Chaya with no prior provenance for \$99,500. A copy of check for \$99,500 was recovered from Steinhardt’s records and includes a note, “No invoice—nothing—Michael gave him \$500 cash.” As discussed previously, Gil

Chaya's antiquities dealer license, which allowed him to legally sell antiquities registered with the Israeli Antiquities Authority, expired at the end of 2007. Any antiquities sale by Gil Chaya after January 2008, therefore, would have been illegal under Israeli law. *See* Exhibit 69B for the most recent photograph of the Stone Skull. No verifiable provenance for the Stone Skull prior to the 2009 sale from Gil Chaya to Steinhardt has ever been identified.

Incense Burner with Ducks, Goats, and Gazelles

The Incense Burner with Ducks, Goats, and Gazelles appears weathered and covered in dirt in a photograph recovered by Israeli authorities. *See* Exhibit 70A. Crafted from bronze with figures of animals, the Incense Burner with Ducks, Goats, and Gazelles dates to circa 1700 B.C.E. and originated in Israel. In an email to law-enforcement authorities, [Redacted] described how Gil Chaya created the Incense Burner:

It was very badly broken and Gil repaired and restored the whole thing in NYC from the small pieces...Gil went alone to Michael with this stand and a statue; I didn't want anything to do with this sale and I repeatedly warned Gil that he was out of control, reckless and dangerous. I remember that Gil used parts from another bronze and added bowls.

The Incense Burner with Ducks, Goats, and Gazelles first surfaced on the international art market on August 1, 2006, when Steinhardt purchased it from Gil Chaya with no prior provenance for \$48,000. *See* Exhibit 70B for the most recent photograph of the Incense Burner with Ducks, Goats, and Gazelles. No verifiable provenance for the Incense Burner with Ducks, Goats, and Gazelles prior to the 2006 sale from Gil Chaya to Steinhardt has ever been identified.

Baboon Amulet

A figure of a baboon carved from red chalcedony, a material composed of delicate interlocking of grains of quartz and moganite, the Baboon Amulet dates to circa 1600-1200

B.C.E. and originated in Megiddo, Israel. According to an email from “lisa” (“gilchaya@bezequint.net”) to Steinhardt’s then-Collection Manager recovered from Steinhardt’s records, the Baboon Amulet came from “tombs at Megiddo.” As discussed previously, unless an antiquity was discovered pursuant to a scientific and legally authorized excavation, detailed knowledge about that antiquity’s “find spot” and how it was found can only be possessed by the looter. It is well-known, therefore, that information from a seller identifying the find spot of an unprovenanced antiquity is often an indication that it has been looted. The Baboon Amulet first surfaced on the international art market on January 21, 2003, when Steinhardt purchased the Baboon Amulet from Gil Chaya with no prior provenance for \$6,000. The invoice notes that the Baboon Amulet was “found in Israel.” *See* Exhibit 71 for the most recent photograph of the Baboon Amulet. Although Chaya listed his dealer’s license in his invoice to Steinhardt, Chaya never registered the Baboon Amulet (as required by Israeli law), and no verifiable provenance for the Baboon Amulet prior to the 2003 sale from Gil Chaya to Steinhardt has ever been identified.

Heliodorus Stele

Crafted from limestone, the Heliodorus Stele bears the inscription of Seleucus IV Philopater and his minister Heliodorus. It dates to 200-100 B.C.E. and was looted from Cave 57 in Tel Maresha, Israel. In 2005, looters operating in Tel Maresha discovered the Heliodorus Stele and sold it to a well-known trafficker from Halhul, Palestine. The trafficker then brought the Heliodorus Stele to an open field near the village of Idna, where Gil and Lisa Chaya were waiting. In an interview with Israeli law-enforcement authorities, Gil Chaya admitted he paid the trafficker \$2000 in cash for the Heliodorus Stele, put it in his car, and drove to Jerusalem. In

2006, Chaya had invited [Redacted] to his Jerusalem warehouse to examine the Heliodorus Stele. But it first surfaced on the international art market on December 26, 2006, when Steinhardt purchased the Heliodorus Stele from Gil Chaya with no prior provenance for \$375,000. In 2007, Steinhardt loaned it to the Israel Museum where Dr. Dov Gera (Ben Gurion University) suspected and then confirmed that the bottom of the Heliodorus Stele fit into base of a Stele recently discovered in Cave 57 at Tell Maresha. *See* Exhibit 72 for the most recent photograph of the Heliodorus Stele. No verifiable provenance for the Heliodorus Stele prior to the 2006 sale from Chaya to Steinhardt has ever been identified. The Heliodorus Stele remains on loan at the Israel Museum and will be seized pursuant to this investigation.

Vase from Pan-Athenian Games

A ceramic amphora from the Pan-Athenian Games, a major religious festival consisting of musical, poetic, and athletic competitions, the Vase from the Pan-Athenian Games dates to circa 400-300 B.C.E. The style and details on the Vase from the Pan-Athenian Games are characteristic of black-figure pots recovered from recent underwater excavations at Thonis-Heracleion, off the coast of Egypt. In an interview with Israeli law-enforcement authorities, Chaya admitted that he purchased the Vase from the Pan-Athenian Games in Dubai from Mohd Said Issa Mousa Jaradot (a/k/a Abu al-Said) a major looter of antiquities known for his role in smuggling a looted Gold Coffin from Egypt to the United Arab Emirates. This Office seized the Gold Coffin from the Met and repatriated it to Egypt in 2019. The Vase from the Pan-Athenian Games first surfaced on the international art market on December 23, 2008, when Steinhardt purchased it from Gil Chaya with no prior provenance for \$300,000. Gil Chaya's invoice noted the Vase had "one crack in the center." As discussed previously,

intentional breaks are often a tell-tale sign of an item's illicit origin since breaking facilitates smuggling. *See* Exhibit 73 for the most recent photograph of the Vase from the Pan-Athenian Games. No verifiable provenance for the Vase from the Pan-Athenian Games prior to the 2008 sale from Gil Chaya to Steinhardt has ever been identified.

Rafi Brown (28 antiquities)

Rafi Brown, a/k/a Rafael Braun (b. 1936), began his career as a conservator and researcher of antiquities. According to Israeli law-enforcement authorities, Brown began working at the Israel Museum in the mid-1960s and ultimately was responsible for cleaning, restoring, and analyzing new acquisitions of Judaica. Through his work at the museum, Brown often met suppliers of freshly discovered antiquities. For example, in 1974, Brown notified researchers at the Hebrew University in Jerusalem of an antiquity freshly discovered by someone in el-Arish, a town in the Northern Sinai.

On December 2, 2019, Israeli law-enforcement authorities interviewed Brown. On July 8, 2020, they executed a search warrant at Brown's residence in Herzeliya, recovering documents and looted antiquities and conducting a second interview. Then, on January 14, 2021, they executed additional search warrants at Brown's residences in Herzeliya, Petah Tiqwa, and Jerusalem, recovering looted antiquities, Polaroid photographs, and documents, including correspondence with Steinhardt's curators.

During the two interviews, and in exchange for an agreement not to be prosecuted in Israel for the looted artifacts seized from his residences, Brown described his illegal-antiquities trade. According to Brown, one of his friends at the Israel Museum, David Jesseljohn offered Brown work with Rabello Anstalt, a shell company based in Lichtenstein that paid Brown to

restore antiquities in Zurich. Brown soon began flying to Zurich to perform restoration work for Rabello Anstalt. In 1985, after leaving the museum, Brown obtained an antiquities license from the IAA and opened a gallery at 10 King David Street in Jerusalem. Although required under Israeli law to maintain (and annually update) a registry of his antiquities with the IAA, Brown admitted he did not register antiquities that he had purchased from certain individuals. The last time Brown registered an antiquity with the IAA was September 13, 1993—though he did not close his gallery until 1997.

According to Brown, he purchased antiquities from unlicensed diggers and middlemen such as Abu Ali Tawil, a Bedouin best-known for discovering the Dead Sea Scrolls. Brown also admitted to getting antiquities from Ghassan al-Rehani (a/k/a Hassan Ricani), a Jordanian antiquities trafficker and smuggler well-known to Jordanian and Israeli law-enforcement authorities. Brown often paid al-Rehani to smuggle those antiquities from Israel to Switzerland, but Brown also delivered them directly to New York for restoration. Although he now had his own gallery, Brown also continued to sell antiquities through Rabello Anstalt.

According to a document recovered by Israeli law-enforcement authorities, Brown entered an agreement with Steinhardt in 2003, in which Brown agreed to sell Brown's entire "Collection" of antiquities to Steinhardt for \$500,000 upon Brown's death. That agreement was signed by both parties.

The 85-year-old Brown remains at large in Israel. To date, this Office has executed three seizures of 28 antiquities trafficked by Brown.

Gold Masks (2)

The two Gold Masks appear cracked and covered in dirt alongside a group of broken

and dirt-encrusted antiquities in a color Polaroid photograph recovered by Israeli authorities. *See* Exhibit 74A. Dating to circa 5000 B.C.E., the two Gold Masks were crafted during the Chalcolithic period in Israel. Depicting the antiquities on a makeshift table, the Polaroid photograph was taken shortly after the looting of the Gold Masks in Israel and sent to Rafi Brown. According to a January 10, 2001, invoice recovered by Israeli authorities, Brown appears to have intended to send the Gold Masks and the other antiquities depicted in the color Polaroid photograph to Irene Shekhtman, a New York-based restorer. In an interview with law-enforcement authorities, however, Shekhtman stated that Brown never sent her the Gold Masks. The Two Gold Masks first surfaced on the international art market on March 27, 2001, when Steinhardt purchased the Gold Masks from Brown with no prior provenance for \$200,000. *See* Exhibit 74B for the most recent photograph of the Gold Masks. No verifiable provenance for the Gold Masks prior to the January 10, 2001, invoice prepared by Brown has ever been identified.

Neolithic Masks (5)

Carved from limestone, the five Neolithic Masks depicting stylized human heads were accessioned by Steinhardt under A1991.23a, b, d, e, & f and date to circa 7000 B.C.E. Discovered as a single assemblage of finds, the Neolithic Masks originated from the Judean Desert. The Judean Desert lies in Israel and the West Bank, east of Jerusalem and descending to the Dead Sea. Following the discovery of the Neolithic Masks, noted trafficker Abu Ali Tawil smuggled them from their find spot to two different locations: two—A1991.23b and e—went to Brown’s gallery (at 10 King David Street in Jerusalem, Israel) and three—A1991.23a, d, and f—went to al-Rehani. As noted previously, Abu Ali Tawil not only found

the Dead Sea Scrolls, but operated as a smuggler in the West Bank and was caught by Israeli authorities supplying metal detectors to looters on the West Bank. Initially, Brown examined the two masks—A1991.23b and e—in Israel. Then, he sent the two masks to al-Rehani as well. Al-Rehani, in turn, smuggled all five Neolithic Masks to Zurich. From Zurich, Brown shipped the Neolithic Masks to the United States.

The Neolithic Masks first surfaced on the international art market by February 1, 1991, when Steinhardt purchased them from Brown with no prior provenance for an unknown price. In a letter from Brown recovered from Steinhardt's files, Brown writes, "on the following page you will find the descriptions of your recent acquisitions [including the subject Neolithic Masks] from Mr. [al-Rehani] of Jordan." A handwritten note recovered from Steinhardt's records for the Neolithic Masks contains the name, "Abuwali Twill." To date, no invoice or proof of payment for any of the five Neolithic Masks has ever been recovered from Steinhardt's records, and a note in Steinhardt's records indicates "no record of purchase." These are five of the seven antiquities—the other two are the Ivory Carving and the Neolithic Female—for which this Office could not find any proof of payment or purchase price. In 2004 and 2014, the Neolithic Masks were exhibited at the Israel Museum. This Office has seized three Neolithic masks: A1991.23a, b, and d. Two Neolithic masks, A1991.23f and e, remain at the Israel Museum and will be seized pursuant to this investigation. *See* Exhibit 75 for the most recent photograph of the five Neolithic Masks. No verifiable provenance for any of the Neolithic Masks prior to their 1991 appearance with Brown has ever been identified.

Undated Yellow Note

Steinhardt's records contain an undated handwritten note on a single page of yellow

paper written on both sides (“Yellow Note”). The note described 12 Brown-trafficked antiquities included in this Report, 5 of which have their “find spots” listed: 4 Neolithic Bulls; (“Cows — 1 find — 4...sites: Rabod JORDAN”) and a Neolithic Female (“near Hebron”). The source of the note was Rafi Brown: a) the antiquities listed on the Yellow Note are the same as those on a February 1, 1991, letter from Brown to Steinhardt; b) the find spot descriptions in the Yellow Note also appear in the February 1, 1991 letter, from Brown; and c) the Yellow Note includes the name “Abuwali Twill,” Brown’s source for the Neolithic Masks.

Neolithic Bulls (4)

A set of four Neolithic limestone carvings of bulls with traces of red paint, the Neolithic Bulls date to circa 7000-6000 B.C.E. and were found outside the village of Rabud. In a letter from Brown recovered from Steinhardt’s files, Brown writes: “[a]ccording to the dealer they were all found in one place.” The Yellow Note also identifies a “find spot”: “Cows — 1 find — 4...sites: Rabod JORDAN.” As discussed previously, unless an antiquity was discovered pursuant to a scientific and legally authorized excavation, detailed knowledge about that antiquity’s “find spot” and how it was found can only be possessed by the looter. It is well-known, therefore, that information from a seller identifying the find spot of an unprovenanced antiquity is often an indication that it has been looted. The Neolithic Bulls first surfaced on the international art market the February 1, 1991, when Steinhardt purchased them from Brown with no prior provenance for \$375,000. Although no invoice for the Neolithic Bulls has ever been identified, there is a check to “Gutamo AG” for \$375,000—the purchase price for the Neolithic Bulls—with a memo for “R. Brown” that was recovered from Steinhardt’s records.

See Exhibit 76 for the most recent photograph of the Neolithic Bulls. No verifiable provenance for the Neolithic Bulls prior to the 1991 sale from Brown to Steinhardt has ever been identified.

Neolithic Female

A Neolithic stone figure of a female, the Neolithic Female dates to circa 7000-6000 B.C.E. and originated from a site near Hebron. The Yellow Note recovered from Steinhardt's files notes the Neolithic Female was found "near Hebron" in Israel. The Neolithic Female first surfaced on the international art market on February 1, 1991, when Steinhardt purchased it from Brown with no prior provenance. In a letter from Brown recovered from Steinhardt's files, Brown described the antiquity as: "Human Neolithic figure probably of a female." As previously discussed, no record of payment for the Neolithic Female has ever been identified though Steinhardt's records contain a note, "piece purchased from Rafi Brown in February, 1991 no invoice." *See Exhibit 77 for the most recent photograph of the Neolithic Female. No verifiable provenance for the Neolithic Female prior to the 1991 sale from Brown to Steinhardt has ever been identified.*

Terracotta Temples (3)

Made from terracotta, the three Terracotta Temples were cultic shrines from the time of King David that originated in Israel circa 1000 B.C.E. One of the three Terracotta Temples appears covered in loose soil in a photograph that was printed in November 1992 and recovered from Steinhardt's records. *See Exhibit 78A.* In an interview with Israeli authorities, Brown admitted that all three Terracotta Temples were smuggled from their find spot to Switzerland by al-Rehani. The Terracotta Temples first surfaced on the international art

market on August 10, 1993, when Steinhardt purchased all three Terracotta Temples directly from Brown with no prior provenance for \$6,000. *See* Exhibit 78B for the most recent photograph of the Terracotta Temples. No verifiable provenance for the Terracotta Temples prior to the 1993 sale from Brown to Steinhardt has ever been identified.

Chalcolithic Altar

Carved from basalt and dating circa 5000 to 4000 B.C.E., the Chalcolithic Altar originated from a Chalcolithic site in Jordan. In an interview with Israeli authorities, Brown admitted the Chalcolithic Altar was smuggled out of Jordan to Switzerland by al-Rehani. The Chalcolithic Altar first surfaced on the international art market on July 20, 1995, when Steinhardt purchased it through Dr. Jesseljohn—the Swiss-based associate of Brown—with no prior provenance for \$10,000. *See* Exhibit 79 for the most recent photograph of the Chalcolithic Altar. No verifiable provenance for the Chalcolithic Altar prior to the 1995 sale from Brown/Jesseljohn to Steinhardt has ever been identified.

Tel El-Yahudiyeh Beer Strainer

The Tel El-Yahudiyeh Beer Strainer appears in a pre-restoration condition lying on a white sheet in a photograph recovered from Steinhardt's records. *See* Exhibit 80A. Dating to circa 1800 B.C.E., the Tel El-Yahudiyeh Beer Strainer features a bulbous body with dark-glaze striped bands and a spout with fine holes to strain liquid. The Tel El-Yahudiyeh Beer Strainer originated from a site in the eastern Nile Delta of ancient Egypt. In an interview with Israeli authorities, Brown admitted that the Tel El-Yahudiyeh Beer Strainer was smuggled from its find spot through Jordan to Switzerland by al-Rehani. The Tel El-Yahudiyeh Beer Strainer first surfaced on the international art market on January 12, 1999, when Steinhardt purchased

it from Brown with no prior provenance for \$5,000. *See* Exhibit 80B for the most recent photograph of the Tel El-Yahudiyeh Beer Strainer. No verifiable provenance for the Tel El-Yahudiyeh Beer Strainer prior to the 1999 sale from Brown to Steinhardt has ever been identified.

Tombstones from Zoar (2)

Carved from stone, the Tombstones from Zoar date to 500 C.E. and originated in the ancient city of Zoar, located within the modern-day boundaries of Jordan. In an interview with Israeli authorities, Brown admitted that the two Tombstones from Zoar were smuggled from Jordan to Switzerland by al-Rehani. The Tombstones from Zoar first surfaced on the international art market on December 9, 1999, when Steinhardt purchased the antiquities from Brown with no prior provenance for \$40,000. *See* Exhibit 81 for the most recent photograph of the Tombstones from Zoar. No verifiable provenance for the Tombstones from Zoar prior to the 1999 sale from Brown to Steinhardt has ever been identified.

Astarte

A stone jar in the form of the goddess Astarte—who was venerated in the Canaanite and Phoenician pantheon—the Astarte dates to the Midianite era and originated in Jordan. In his interview with Israeli authorities, Brown admitted that the Astarte was smuggled from Jordan to Switzerland by al-Rehani. The Astarte first surfaced on the international art market on December 9, 1999, when Steinhardt purchased it from Brown with no prior provenance for \$15,000. Brown sold the Astarte on the same invoice as the Two Tombstones from Zoar. *See* Exhibit 82 for the most recent photograph of the Astarte. No verifiable provenance for Astarte prior to the 1999 sale from Brown to Steinhardt has ever been identified.

Bronze Pitcher with Snake Shaped Handle

The Bronze Pitcher with Snake Shaped Handle appears dirty, covered in encrustations, and missing a handle in a photograph recovered from Steinhardt's records. *See* Exhibit 83A. Dating to circa 300-200 B.C.E., the Bronze Pitcher with Snake Shaped Handle originated in Jordan. The Bronze Pitcher first surfaced on the international art market on August 9, 2001, when Steinhardt purchased it from Brown with no prior provenance for \$15,000. The invoice lists the country of origin as "Jordan." *See* Exhibit 83B for the most recent photograph of the Bronze Pitcher with Snake Shaped Handles. No verifiable provenance for Bronze Pitcher with Snake Shaped Handle prior to the 2001 sale from Brown to Steinhardt has ever been identified.

Statue of a Winged Human

A stone vessel of a winged human with red painted details, the Statute of a Winged Human dates to circa 500 to 300 B.C.E. and originates from the Sinai Peninsula in Egypt. Between the 1967 Six-Day War and the 1973 Yom Kippur War, the Sinai Peninsula experienced significant armed conflict and multiple shifts in governance. It is a well-documented that looting of antiquities increases during times of civil unrest and war. When an unprovenanced antiquity appears on the international art market for the first time immediately after geo-political turbulence in its country of origin, therefore, that is often an indication that it has been looted. It was immediately after such a period that the Statue of a Winged Human first surfaced. In a 1974 Israel Exploration Journal article, the authors examined the Statue of a Winged Human and "thank[ed] R. Brown of the Israel Museum who kindly informed them of the find and enabled them to examine it." The authors noted that "grains of sand were found among [the Statue of a Winged Human's] grooves" and that the statute had been found

between Bir el-‘Abd and Bir Salamana, and brought to Jerusalem by a resident of el-‘Arish. The Statute of a Winged Human surfaced on the international art market on June 21, 1999, when Steinhardt purchased it from Brown with no prior provenance for \$25,000. *See* Exhibit 84 for the most recent photograph of the Statue of a Winged Human. No verifiable provenance for Statue of a Winged Human prior to the 1974 Israel Exploration Journal article has ever been identified.

Ivory Carving

The Ivory Carving appears caked in mud in photographs that were printed in November 1989 and recovered from Steinhardt’s records. *See* Exhibit 85A. A carved piece of ivory depicting 12 highly-engaged figures on musical instruments, the Ivory Carving dates to circa 100 B.C.E. to 100 C.E. and is characteristic of ivory antiquities recovered from Roman sites in Egypt. The Ivory Carving first surfaced on the international art market in 1991, when Steinhardt purchased it from Brown with no prior provenance for an unknown price. Steinhardt’s records indicate the Ivory Carving was accessioned in 1991 from Brown, but—as previously discussed—no record of payment for the Ivory Carving has ever been identified. According to a letter dated April 14, 1995, recovered from Steinhardt’s records, the Ivory Carving is described as featuring “loose earth or fill material flaking off the back surface.” As discussed earlier, in scientific and legally authorized excavations, recovered antiquities are thoroughly cleaned following their discovery. Thus, dirt or encrustations on an unprovenanced antiquity is often an indication that it has been looted. *See* Exhibit 85B for the most recent photograph of the Ivory Carving. No verifiable provenance for Ivory Carving prior to its 1991 sale from Brown to Steinhardt has ever been identified.

Egyptian Hoard (5)

A set of gold and silver ornaments and plaques, the Egyptian Hoard dates to 1300-1101 B.C.E. and originated in Egypt. The Egyptian Hoard first surfaced on the international art market on June 21, 1999, when Steinhardt purchased the antiquities from Brown with no prior provenance for \$70,000. Brown's invoice lists a "Silver Hoard," including "2 plaques with human figures, earrings, pendants and silver beads." As previously discussed, within the archaeological community, a "hoard" (a series of objects buried together in antiquity) is extensively studied for its sociological and anthropological insights into ancient cultures. Thus, the discovery of a hoard is heavily reported and widely published. The sudden appearance on the international art market of an unprovenanced hoard such as the Egyptian Hoard (identified as such by an antiquities trafficker), therefore, is often an indication that the objects have been recently looted. A note recovered from Steinhardt's records indicates that portions of the Egyptian Hoard were "cleaned" by "Jane" on July 28, 2000. The need to "clean" the antiquities following their arrival in the United States further corroborates their illegality. *See* Exhibit 86 for the most recent photograph of the Egyptian Hoard. No verifiable provenance for the Egyptian Hoard prior to the 1999 sale from Brown to Steinhardt has ever been identified.

Pasquale Camera (1 antiquity)

Pasquale Camera (b. 1948), also known as "the Fat Guy," was a prominent *capozona* (regional crime boss) who oversaw the *tombaroli* in a specific region of Italy. Camera rose to captain in the Guardia di Finanza (Italian finance and customs police) before being fired because of his criminal involvement in the illegal trafficking of Italian objects. In an interview of notorious *capozona* Pietro Casasanta conducted by Public Prosecutor Paolo Ferri, Casasanta

claimed that Camera had been known for organizing thefts from museums and churches in Italy as early as the 1960s when Camera was a Lieutenant in the Guardia di Finanza. Then, in the 1980s, Camera began working as a *capozona*, purchasing stolen artifacts from *tombaroli* and selling them to antiquities dealers. In 1995, pursuant to “Operation Gerione,” the Judicial Authority of Santa Maria Capua Vetere (Castera, Italy) began investigating Camera for possible involvement in the armed theft of eight Greek vases from the medieval castle of Melfi in 1994.

On August 31, 1995, Camera died in a car crash on Italy’s Autostrada del Sole. Upon searching the car, authorities found 50 million lire (approximately \$ 31,000) in cash in the car and several photographs of recently looted antiquities. Within 30 minutes of the discovery of the photographs, officers of the Italian Carabinieri applied for a search warrant to raid and search Camera’s apartment in Rome. The next day, September 1, 1995, when the Carabinieri searched Camera’s apartment, they found hundreds of documents and photographs concerning looted antiquities.

The material recovered from Camera led to an additional 70 raids and 19 convictions. One of these raids, conducted on January 13, 1996, on the property of Danilo Zicchi, resulted in the recovery of the “Organigram,” a now-famous hand-written document prepared by Camera. The Organigram depicted a diagram of the organizational structure of the largest Italian trafficking network, naming most of the major players and linking them with arrows and lines. The discovery of the Organigram represented a watershed in the investigation and prosecution of antiquities trafficking networks throughout Europe and the United States. And, in so doing, it confirmed the central roles of Giovanni Franco Becchina, Giacomo Medici, George Ortiz, Robert Hecht, Frieda Tchakos, Mario Bruno, Raffaele Monticelli, and others in

a trafficking network with global reach.

To date, this Office has executed one seizure of one antiquity trafficked by Camera.

Ercolano Fresco

Depicting an infant Hercules strangling a snake sent by Hera to slay him, the Ercolano Fresco dates to 50 C.E. and was looted in 1995 from a Roman Villa in “Oliva dei Monaci” in Herculaneum, located near modern Naples in the shadow of Mount Vesuvius. Photographs recovered by Italian law-enforcement authorities depict the precise find spot for the Ercolano Fresco. On the photographs themselves, the looters made hand-written notes indicating the location of the looting pit relative to the sea and to Mount Vesuvius. Italian law-enforcement authorities had also received a letter containing eleven different photographs of the Ercolano Fresco and of a second looted fresco. The letter, translated from Italian to English, noted:

[t]hese pictures concern somebody you know, Pasquale, also known as the fat guy, who died some time ago and the pictures are related to the frescos that the professor from Taranto bought from Pasquale, now you have to find the frescos where they are located, in the United States of America.

The “fat guy” in the letter was Pasquale Camera, and the “professor from Taranto” is the well-known appellation for the prolific trafficker Raffaele Monticelli. Both the photographs and the letter were sent anonymously to Italian law-enforcement authorities in the port-city of Bari by *tombaroli* angered at being cheated out of their cut of the sale of the looted Ercolano Fresco.

The information proved accurate. Monticelli had purchased the Ercolano Fresco from Camera for approximately \$120,000 in cash. Monticelli then smuggled the Ercolano Fresco out of Italy and sold it to Robert Hecht for approximately \$240,000 in cash. The Ercolano Fresco first surfaced on the international art market on November 10, 1995, when Jasper

Gaunt (Hecht's business partner) wrote to Steinhardt regarding a "crate being delivered to you soon" containing the restored Ercolano Fresco. On November 22, 1995, Harry Bürki sent Steinhardt an invoice for \$650,000 with no prior provenance.

The invoice listed the same two frescoes that the anonymous *tombaroli* later sent to the Italian authorities. The first fresco was described as "One roman painting, c.a. 50 A.D." with a hand-written note identifying it as "Herakles Strangling the Serpent," i.e., the Ercolano Fresco. The second fresco on the invoice was described as "also Roman, ca. 50 A.D. ca. 43 cm wide and 107 cm high wich (sic) will be shipped soon." A handwritten note on the invoice indicated that Steinhardt did not purchase this second fresco.

According to a letter dated February 17, 1999, from Harry Bürki to Steinhardt, recovered from Steinhardt's files, Bürki noted:

I was surprised to learn that the Italian government had suggested that the wall-painting had been stolen from Herculaneum in May 1995.

This painting has been in my family for twentyfive (sic) years or so, and we acquired it from a Bulgarian medical doctor.

As discussed previously, Bürki often created fake provenance for Hecht by attributing works to his family's "collection," as he did here, falsely claiming on his invoice to Steinhardt that the Ercolano Fresco was "exported legally from [its] country of origin." See Exhibit 87 for the most recent photograph of the Ercolano Fresco. No verifiable provenance for the Ercolano Fresco prior to the 1995 sale from Bürki/Hecht to Steinhardt has ever been identified.

George Ortiz (1 antiquity)

George Ortiz (b. 1927) began collecting antiquities in the 1940s, convinced that "by

acquiring ancient Greek objects [he] would acquire the spirit behind them,” and eventually amassed a vast collection of antiquities in Geneva. After a Carabinieri raid on several *tombaroli* resulted in the recovery of documents they had from and to Ortiz, the Carabinieri investigated Ortiz in Italy. In 1961, Ortiz was indicted in Rome for his possession of stolen Italian antiquities. In 1976, Ortiz was convicted, but he appealed his conviction and was eventually pardoned.

Ortiz appears frequently in the Becchina Archive, and those seized records depict a clear picture of a close personal and business relationship between Ortiz and Becchina that started in the late 1970s and grew particularly strong in the 1980s. For example, on November 30, 1981, Ortiz purchased from Becchina a dozen Black- and Red-Figure vases, all looted from a single tomb in southern Italy. In 1988, Ortiz paid Becchina \$920,000 for an “Etruscan Treasure,” comprising a rare group of Etruscan gold jewelry looted from an Etruscan necropolis. In addition to these and dozens more purchases, letters between Ortiz and Becchina reveal that Ortiz was also selling looted antiquities through Becchina’s Basel-based gallery, Antike Kunst Palladion. Their correspondence includes lists detailing: antiquities consigned and sold, expenses paid by Ortiz for restorations and photographs, shipments of looted items, amounts owed to Ortiz (“GO”), and the 20% commission due to Becchina (“GB”).

In 1996, Ortiz’s name reappeared on the infamous Organigram, the handwritten list of the members of the antiquities trafficking ring operated by known-traffickers Giovanni Franco Becchina, Giacomo Medici, George Ortiz, Robert Hecht, Frieda Tchakos, Mario Bruno, Raffaele Monticelli and traffickers. Unabashed throughout his life about his rapacious

collecting, Ortiz once rationalized his approach, “to acquire antiquities, even if they have left a country ‘illegally,’ more often than not amounts to saving these artefacts.”

Ortiz died in 2013. To date, this Office has executed one seizure of one antiquity trafficked by Ortiz.

Glass Oinochoe

Featuring a marbled pattern of blue and yellow and a miniature mask of Zeus, the Glass Oinochoe was crafted using the ancient core-formed technique between 400-300 B.C.E. The color, form, and technique are characteristic of Hellenistic vessels discovered on the Greek island of Rhodes, which sat at the cross-roads of East and West. A conservation report prepared for the Glass Oinochoe found “burial soil in many of the recessed areas.” As discussed previously, in scientific and legally authorized excavations, recovered antiquities are thoroughly cleaned following their discovery. Thus, dirt or encrustations on an unprovenanced antiquity is often an indication that it has been looted. The Glass Oinochoe first surfaced on the international art market on April 2, 2002, when George Ortiz consigned it to Robert Haber. The invoice states that the Glass Oinochoe is Greek, but lists no prior provenance, stating that Ortiz had “acquired it some 20 years ago.” On February 22, 2008, Steinhardt purchased the Glass Oinochoe from Haber with no prior provenance for \$433,500. On August 11, 2015, Steinhardt loaned the Glass Oinochoe to the Met, valuing it at \$850,000. The Glass Oinochoe remained at the Met until this Office applied for and received a warrant to seize it. *See* Exhibit 88 for the most recent photograph of the Glass Oinochoe.

No verifiable provenance for the Glass Oinochoe prior to the 2002 Ortiz consignment to Haber has ever been identified.

Noriyoshi Horiuchi (1 antiquity)

Antiquities dealer Noriyoshi Horiuchi (b. 1944) worked extensively with Giovanni Franco Becchina and other Italian traffickers. Horiuchi began dealing in antiquities in the 1980s when he opened a gallery on London's New Bond Street. By the 1990s, Horiuchi relocated his gallery to Tokyo. In 2008, Italian and Swiss law-enforcement authorities seized approximately 500 artifacts from Horiuchi's storage unit in the Geneva Freeport, of which 337 were returned to Italy. In the Becchina decision, Judge Rosalba Liso declared that 90% of the Italian objects seized from Horiuchi came from Becchina. In 2014, a statue of sleeping female owned by Horiuchi (and purchased from Becchina) was returned to Italy after a forfeiture action by the Office of the U.S. Attorney for the Eastern District of New York (EDNY).

The 77-year-old Horiuchi remains at large in Japan. To date, this Office has executed one seizure of one antiquity trafficked by Horiuchi.

Statue of a Woman

A figurine measuring 5.11 inches high, the Statue of a Woman was crafted from bronze on the Greek island of Crete between 2000-1500 B.C.E. A conservation report prepared by the Met for the Statue of a Woman recorded that "the interior has a loosely bound mix of earth" that "falls out when handling." The photograph taken during the examination depicted clumps of earth along the interior of the statue. *See* Exhibit 89A. The Statue of a Woman first surfaced on the international art market on May 15, 1991, when Horiuchi purchased it from Phoenix Ancient Art in Geneva. An undated database print-out prepared by Horiuchi indicates that the Statue of a Woman is from "Greece" and was "found together" with another

object. Again, such detailed knowledge regarding the circumstances of an item “found” with an antiquity can only be possessed by the looter. On December 8, 1994, Horiuchi hand-carried the Statue of a Woman to the Met, which accepted the loan of the antiquity from Horiuchi with no provenance whatsoever. On December 11, 2009, and while the Statue of a Woman was still on loan at the Met, Steinhardt purchased it from Horiuchi for \$650,000. The Statue of a Woman continued on loan at the Met with Steinhardt valuing it at \$1,300,000. The Statue of a Woman remained at the Met until this Office applied for and received a warrant to seize it. *See* Exhibit 89B for the most recent photograph of the Statue of a Woman. No verifiable provenance for the Statue of a Woman prior to the 1991 sale from Phoenix Ancient Art to Horiuchi has ever been identified.

Michael Ward (1 antiquity)

Michael L. Ward (b. 1943) dealt antiquities in New York City from 1982 to 2010 through his gallery in Manhattan. During this time, he bought antiquities directly from known traffickers such as Giovanni Franco Becchina and Edoardo Almagià. He then sold them—typically with no listed provenance—to U.S. museums and prominent collectors, including Lawrence and Barbara Fleischman and Steinhardt. Ward’s attitude for due diligence and provenance is demonstrated by a 1992 fax to Steinhardt, in which he advises Steinhardt that “[t]he more you inquire about details of ownership, etc. the less likely you will appear (if there is, God forbid a question) a credible bona fide purchaser. Michael, you want to appear as dumb as possible!”

In the early 1990s, Ward acquired a group of 50 gold pieces of Mycenaean jewelry, dated to the 15th century B.C.E., from an unknown source. He then offered this group, known

as the “Aidonia Treasure,” at auction, with bidding set to start at \$1.5 million. In fact, the Aidonia Treasure had been looted from recently discovered tombs at Aidonia, a Greek site northeast of Mycenae. In May 1993, Greece filed suit in the Southern District of New York (SDNY) for the treasure’s return. In December 1993, Greece agreed to drop the lawsuit in exchange for Ward donating the treasure to the Society for the Preservation of Greek Heritage in Washington, D.C. The Society later returned the Aidonia Treasure to Greece. Then, in 2005, Ward sold a red-figure calyx krater, dated to the fourth century B.C., to the Dallas Museum of Art. Contrary to Ward’s claimed provenance—that the vase came from a “Swiss private collection”—the vase had actually been looted by Becchina and smuggled to Becchina’s gallery in Basel. In other words, the “Swiss private collection” was the Italian Giovanni Franco Becchina. The red-figure calyx krater was later repatriated to Italy.

Finally, Ward’s name also appears as the direct purchaser of more than a dozen looted Italian artifacts in the private looting records of antiquities trafficker Edoardo Almagià.

The 78-year-old Ward continues to operate his gallery in New York. To date, this Office has executed two seizures of two antiquities trafficked by Ward.

Veiled Head of a Female

Depicting a female figure with a draped head covering, the Veiled Head of a Female was carved from reddish marble circa 350 B.C.E. The Veiled Head of a Female has been identified as originating from a shrine within a tomb at the ancient city of Cyrene (modern-day Shahhat, Libya). In 1999, scientific excavations in and around the area from which the Veiled Head of a Female originated, were forced to shut down in the face of growing unrest and governmental instability. Tombs in Cyrene almost immediately began to suffer extensive

looting (particularly of large female sculptures). It was immediately after these reports of looting that the Veiled Head of a Female first appeared on the market. As previously discussed, specific regions or areas are often the subject of targeted looting due to insufficient security, active scientific excavations temporarily shutting down for the season, or increased demand for a recently discovered object. The sudden appearance of an unprovenanced antiquity on the international art market for the first time after reports of looting from the area in which its type originated, therefore, is often an indication that it has been looted.

The Veiled Head of a Female first surfaced on the international art market on November 10, 2000, when Steinhardt purchased it from Michael Ward with no prior provenance for \$1,200,000. On his invoice, Ward noted the Veiled Head of a Female was “possibly from North Africa” and “a light brown earthy deposit uniformly covering the head imparts to its surfaces an attractive, warm patina.” This “earthy deposit” was confirmed in a condition report by C & M Arts that was recovered from Steinhardt’s records to be “dirt (particularly on nose & in veil).”

Ward’s invoice also noted that although the “tip of the nose was broken off in antiquity...there is a clean break through the marble at the very base of the neck.” As previously discussed, looters and smugglers often intentionally break large statues into smaller pieces to ease transport and avoid detection by customs and other law-enforcement officials. When an unprovenanced statute appears in fragments that are easily fixable (neck, elbow, knee, etc.), therefore, it is often an indication that it has been looted. The fresh break at the very base of the neck of the Veiled Head of a Female is characteristic of this type of intentional breakage wrought by looters in order to facilitate the smuggling of looted antiquities. *See* Exhibit 90 for the most

recent photograph of the Veiled Head of a Female. No verifiable provenance for the Veiled Head of a Female prior to the 2000 sale from Ward to Steinhardt has ever been identified.

Svyatoslav Konkin (1 antiquity)

Svyatoslav (a/k/a Slav) Konkin (b. 1972) is a Russian citizen who began dealing in Russian art and antiquities in the 1990s. Between 2003 and 2007, Konkin expanded his business by purchasing the collections of two London-based dealers, Theodore Sarvas and Ian Roper. Sarvas, now deceased, had a well-documented collection of Greek antiquities, but Roper has been the subject of numerous investigations in the United Kingdom and Germany for his role in consigning freshly excavated antiquities to European auction houses with fake provenance. In 2010, Konkin expanded his business again, this time purchasing Central Asian and Middle Eastern antiquities through dealers in Hong Kong.

Konkin sold his first antiquity to Steinhardt in 2017—selling him another 18 since then. Prior to the execution of this Office’s January 2018 warrants on Steinhardt, Konkin delivered all antiquities he sold to Steinhardt via international shipping. After the January 2018 warrants, however, Konkin changed his manner of delivery, and hand-carried all six international deliveries of antiquities to Steinhardt.

One of Konkin’s hand-carried antiquities is illustrative. On December 9, 2019, Konkin arrived at Newark Airport from London’s Gatwick Airport with an antiquity, a gold drinking horn (rhyton) in the form of a ram, which Konkin had declared on the customs entry paperwork to be of Tajik origin and consigned to Steinhardt. In fact, it was a gold 6th-4th century B.C.E. Achaemenid (Persian) rhyton that had been looted and trafficked from Iran. Konkin was intercepted by U.S. law-enforcement officials at Newark Airport and thoroughly

interviewed. The rhyton has been seized and will be repatriated to Iran.

The 49-year-old Konkin continues to operate in Russia and the United Kingdom. To date, this Office has executed two seizures of two antiquities trafficked by Konkin.

Gold Bowl

Crafted from gold with a scalloped flower design, the Gold Bowl was looted from Nimrud, a city in Northern Iraq that had its height in the modern Assyrian Age (911-612 B.C.E.). As previously discussed, an international investigation determined that more than 10,000 antiquities were stolen from Baghdad's Iraq Museum in April 2003. During the course of the investigation, the team recovered and photographed many items from Nimrud identical to the Gold Bowl. Beginning in 2015, objects from Nimrud were again trafficked when the Islamic State in Iraq and the Levant (ISIL) targeted cultural heritage from Nimrud, Hatra, and Khorsabad, often documenting their efforts on YouTube. ISIL even established a Department of Antiquities to profit from the looting of antiquities from its territory and supplied locals with looting "permits." According to a 2016 complaint filed by the Office of the U.S. Attorney for the District of Columbia, ISIL placed special emphasis on ancient objects made of gold or precious metal and demanded locals find such objects.

The Gold Bowl first surfaced on the international art market on October 22, 2019, when Customs and Border Patrol (CBP) Officer Christopher Foulkes notified this Office that Konkin was on a flight from Hong Kong to Newark, New Jersey, hand-carrying the Gold Bowl for Steinhardt. Konkin initially stated that he had purchased the Gold Bowl in 2011 and that it was of Tajik origin. He later admitted, however, that he knew the Gold Bowl would be stopped by customs officials if declared any antiquity as Iranian or Iraqi.

As a result of the ongoing investigation into Steinhardt, this Office directed that the Gold Bowl be returned to Konkin so he could deliver it as planned. He did so. And on July, 10, 2020, Steinhardt purchased the Gold Bowl from Konkin with no prior provenance for \$150,000. *See* Exhibit 91 for the most recent photograph of the Gold Bowl. Although Konkin claimed in a letter to Steinhardt that the Gold Bowl “has clear history which goes back at least up to 1970 and earlier,” no verifiable provenance prior to Konkin’s 2019 arrival into the United States has ever been identified.

Axel Gordian Weber (1 antiquity)

Axel Gordian Weber (b. 1968) is the director of Axel Gordian Weber Kunsthandel, an antiquities gallery based in Cologne, Germany, and well-known to law-enforcement authorities. For example, in 2004, German law-enforcement authorities seized from Weber an ancient axe that had been stolen from Iraq and sold to Weber by the previously discussed Munich-based smuggler Fuad Üzülmöz. It was ultimately repatriated in 2011.

The 53-year-old Weber continues to operate his gallery in Germany. To date, this Office has executed one seizure of one antiquity trafficked by Weber.

Helmet

Crafted from iron, silver, bronze, and organic materials, the Helmet dates to circa 400-300 B.C.E. and originated in Bulgaria, near modern-day Pletena. According to a report recovered from Steinhardt’s records, the Helmet was, “shattered in more than thirty dirt...encrusted pieces...which appeared irrerecognizable (sic) and distorted partly due to the thick organic build-up.” As previously discussed, in scientific and legally authorized excavations, recovered antiquities are thoroughly cleaned following their discovery. Thus, dirt

or encrustations on an unprovenanced antiquity is often an indication that it has been looted. The Helmet first surfaced on the international art market on March 24, 1998, when Steinhardt purchased the antiquity from Axel Weber with no prior provenance for \$175,000. Steinhardt's records include a note: "allegedly excavated from site in Bulgaria." *See* Exhibit 92 for the most recent photograph of the Helmet. No verifiable provenance for the Helmet prior to the 1998 sale from Weber to Steinhardt has ever been identified.

Patrimony Law of Foreign Nations

Each of the 180 Seized Antiquities constitutes stolen property under New York State criminal law based on the evidence of theft as summarized above. This evidentiary basis is sufficient irrespective of the manner of each antiquity's exportation from its country of origin: "Of course, owned property may have been illegally taken or converted [into stolen property] before exportation, e.g., by discovering and failing to register an artifact or by an unlawful transfer...If the artifacts were stolen before exportation, they still constitute[] stolen goods after exportation" *U.S. v. McClain*, 545 F.2d 988, 1003 n.33 (5th Cir. 1977).

Apart from the actual theft (by looting, by illegal transfer, at gunpoint, etc.), however, the illegal removal of an antiquity from its country of origin may also, under certain circumstances, provide a second sufficient and independent basis for proving that antiquity constitutes stolen property under New York State criminal law. It is well-settled that, standing alone, wrongful exportation of an antiquity from its country of origin does not constitute a crime under New York State's criminal law. But once a country establishes a patrimony law, its "declaration of national ownership suffices to render an illegally exported item 'stolen'." *Id.* at 1001.

In other words, if an antiquity is removed from its country of origin after the effective date of that country's applicable patrimony law, then the "illegal exportation constitutes a sufficient act of conversion to be deemed a theft." *Id.* at 1003 n.33. Indeed, even if antiquities were possessed prior to that country's patrimony law, but the new, stricter law established a requirement, for example, that all previously held antiquities be registered or sold only through a licensed dealer, and the possessor failed to comply with either, then their "illegal exportation is the act, if any, that renders them stolen." *Id.* Notably, this basis of theft is independent of any other basis, such as looting. This is because the illegal removal of an antiquity in violation of the applicable patrimony law does not merely violate export-restrictions but a legislative fiat that is "intended to assert true ownership of certain property." *Schultz*, 333 F.3d at 410.

Here, all 180 antiquities were taken out of their countries of origin following the effective date of their respective patrimony laws. Not a single one of the 180 Seized Antiquities has ever received a valid export permit from its country of origin. Thus, each of the 180 Seized Antiquities were illegally removed from their respective countries of origin under such circumstances rendering them stolen under New York's criminal law. In interpreting the applicable patrimony laws in this investigation, this Office relied primarily on the following legal experts for the following countries of origin.

Bulgaria

According to Dr. Maria Yordanova, a Senior Fellow at the Law Program of the Center for the Study of Democracy, in Sofia, Bulgaria, in 1969, the Law on *Cultural Monuments and Museums* (amended many times between 1973-2005) regulated the protection of "any immovable and movable authentic material evidence of human presence and activity and of

the processes in nature, which has scientific and/or cultural value and has public significance.” This Law required cultural monuments to be registered with the State, including objects outside the territory of Bulgaria, and assigned one of five categories of importance; namely, monuments of international importance, national importance, local importance, informational value, and ensemble significance. Clandestine discoveries had to be reported within one week and were property of the State—any findings that were not reported were subject to confiscation. Private persons or legal entities could own cultural property, but the export of movable cultural objects outside of the Republic of Bulgaria without a special permit was prohibited. Movable cultural monuments that were designated a national treasure could only be exported temporarily for presentation to a foreign public or for conservation, restoration, or research. Movable cultural objects that were not a national treasure and did not fall into one of the five categories could be exported through a certificate.

In 1991, the *Constitution of the Republic of Bulgaria* established state ownership of natural and archaeological reserves. In 1999, *The Culture Protection and Development Act* set out the basic principles and priorities of Bulgarian policy in the field of culture; namely, “safeguarding and enriching the cultural and historical heritage.” In 2009, *The Cultural Heritage (Patrimony) Act (CHA)* replaced the 1969 Law and is the primary cultural patrimony legal act currently in effect in Bulgaria. The law stipulates that cultural values (defined as non-tangible or tangible evidence of human presence) can be either public or private property, and that they may be owned by the state, municipalities, and registered religious denominations, as well as by natural persons or legal entities. The CHA prohibits the export of movable cultural objects outside of the Republic of Bulgaria without an export license or certificate, but cultural objects deemed as

national treasures may only be granted temporary export licenses and only for specific purposes.

A 2011 amendment specifies that archeological sites in the territory and national waters of the Republic of Bulgaria constitute state property. Legally acquired cultural property remains private property. But anyone (natural person or legal entity) who possesses cultural property (identified as a collection) must maintain a register containing a descriptive and photographic catalogue of the cultural property in their collection, as well as a certificate or passport issued in accordance with the law. Cultural objects found clandestinely must be brought to the attention of the nearest state, regional or municipal museum within seven days. Museums, dealers, and auction houses may sell cultural objects if the objects are duly identified and registered, and when the dealing persons/institutions have either the necessary permission or necessary registration and licensing under the law.

Egypt

According to Dr. Patty Gerstenblith, Distinguished Research Professor at DePaul University College of Law and Faculty Director of its Center for Art, Museum and Cultural Heritage Law, the excavation and removal of Egyptian antiquities were first regulated in the 19th century with an 1835 ordinance. This was followed by an 1869 ordinance prohibiting export; an 1874 ordinance declaring all undiscovered antiquities to be the property of the State, but dividing ownership rights among the government, the landowner, and the excavator; an 1883 decree declaring that the collection of the Museum of Egyptian Antiquities (as well as collections in future museums) and “[a]ll the monuments and objects of antiquity, recognized as such by the Regulation governing the matter” to be the inalienable property of the State;

and an 1891 decree prohibiting any excavations without a permit from the Director General of Museums and Excavations. In the 1891 decree, all antiquities discovered during a legal excavation belonged to the State, but the excavator had a right of partage (division of the finds) and the Antiquities Service had the right to purchase anything from the excavator's share. Ordinances of 1905 and 1909 continued—with some exceptions—the prohibition on export and on excavation without a permit and on export.

Law No. 14 of 1912 vested ownership in the State of all antiquities “found on, or in the ground,” including “all manifestations and all products of the arts, sciences, literature, religion, manners, industries or Pharaonic, Greek, Roman, Byzantine and Coptic Egypt.” This included an array of immovable structures and of movable objects, such as sarcophagi, coffins, mummy wrappings, mummies, portraits and masks, stelai, statues and statuettes, inscriptions, ostraca, manuscripts, worked stone, arms, utensils, vases, glasswork, fabrics of clothing, jewelry, scarabs, amulets, weights, coins and engraved shells. The law continued the right of partage for legal excavations, continued the prohibition on excavations without a permit, required that the government be immediately notified of all discoveries, and authorized licensed dealers to trade in antiquities. Later in 1912, three Ministerial Orders provided detailed regulations concerning the excavation, trade, and export of antiquities, specifically requiring dealers to keep and update a registry of objects in their inventory.

Law No. 215 of 1951 extended the definition of antiquities to include those from prehistoric times to the end of the reign of Ismail Pasha (1895). All immovable and movable antiquities remained the property of the State, except those belonging to the *waqf* (religious or charitable endowment); excavations or exports without a permit continued to be prohibited;

all dealers still needed to be licensed; and all discoveries still required governmental notification. But museums were allowed to exchange or sell antiquities that were present in duplicate, and some private ownership of antiquities was permitted; specifically, antiquities already in private collections at the time of the enactment of the law, antiquities museums were authorized to sell or exchange, antiquities imported from abroad, and antiquities from later time periods that the State chose not to acquire.

In 1983, Egypt enacted Law 117, “The Law on the Protection of Antiquities,” defining antiquities as any movable or immovable property “that was the product of the different civilizations or was the creation of arts, sciences, literature and religion since the prehistoric ages till before 100 years ... provided that it is of value of an archaeological or historical importance as an aspect of the different aspects of civilization which took place on the Egyptian lands ... ” Ownership of all antiquities (excepting those belonging to the *waqf*) was vested in the State, and the ownership, possession, disposition, or trade of antiquities was prohibited. But anyone in legal possession of antiquities before 1983 could maintain possession if they notified the government and registered the antiquities within six months of enactment of the law. This law was analyzed extensively in *United States v. Schultz*, 333 F.3d 393 (2d Cir. 2003), which held that the antiquities at issue were owned by Egypt and that any antiquities removed from Egypt without the permission of the government were considered stolen property. The 1983 Law is still in effect, but was amended in 2010 by Law No. 3 of 2010, maintaining the substantive aspects of the 1983 law.

Greece

According to Ms. Terressa Davis, the Executive Director of the Antiquities Coalition,

Greece is among the first nations in the world to vest ownership of its antiquities in the state. Immediately after its War of Independence (1821-1830), Greece issued a number of decrees to protect antiquities. In 1834, Law No. 10/1834 “On Scientific and Technological Collections, on the Discovery and Conservation of Antiquities and the use thereof,” established that “all objects of antiquity in Greece, being the productions of the ancestors of the Hellenic people, are regarded as the common national possession of all Hellenes.” It also provided for the inclusion of “objects of art dating from the most ancient period of Christianity or the so-called Middle Ages.” Although permitting private ownership under very limited circumstances, the law vested ownership in the state of all antiquities found on or beneath publicly owned land, at the bottom of the sea, in public rivers, streams, lakes, or marshes. It also required the state be notified of any sales or finds, granted a right of preemption to the state in the purchase of antiquities, prohibited the excavation or export of antiquities without permit.

In 1899, Law No. 10/1834 was replaced by the much stricter Law No. 2646, establishing the exclusive right of ownership in the state over all movable and immovable antiquities found anywhere in Greece—whether public or privately owned. In 1914, Law No. 401/1914 introduced measures of protection for pre-1830 Byzantine, Christian, and medieval works of art and historical value. In 1920, Law No. 2447/1920 added pre-1830 churches and other artistic and historic monuments and buildings. All of these laws were consolidated into Codified Law No. 5351/1932, “The Antiquities Act,” which served as the base for Greece’s cultural heritage legislation until 2002.

In 2002, Law No. 3028/2002, “On the Protection of Antiquities and Cultural Heritage

in General,” that is in effect today maintains Greece’s laws of patrimony. The Law vests ownership in the state of all pre-1453 movable and immovable cultural objects, while also prohibiting the export of any cultural objects from Greek territory without a permit from the Minister of Culture.

Iraq

According to Dr. Gerstenblith, the area that is today the Republic of Iraq was part of the Ottoman Empire until the end of the First World War. The Ottoman government enacted the Antiquities Law of 1874 to ensure that the Imperial Museum (now the Archaeological Museum of Istanbul) would receive one-third of all artifacts recovered through excavations. The remaining share was divided between the excavator and landowner. Antiquities that were discovered fortuitously, however, belonged to the State. The 1884 Antiquities Law vested ownership of all types of antiquities in the State and prohibited export without the permission of the Imperial Museum in Istanbul.

Following the First World War, Iraq became part of the British Mandate. The 1920 Treaty of Sèvres defined antiquities as “any product of human activity earlier than the year 1700” and prohibited the transfer of an antiquity to anyone other than to the government unless the government renounced its right of acquisition. The Antiquities Directorate, established by Gertrude Bell, encouraged foreign expeditions and had the authority to determine the division of finds uncovered through these excavations.

Following independence in 1932, Iraq enacted Antiquities Law No. 59 in 1936. With minor amendments in 1974 and 1975, it remained the law of Iraq with respect to antiquities until 2002. It defined antiquities as movable and immovable property at least 200 years old

and “erected, made, produced, sculptured, written, drawn or photographed by man.” The 1936 law declared that “[a]ll antiquities in Iraq whether movable or immovable that are now on or under the surface of the soil shall be considered to be the common property of the State.” As for those who possessed movable antiquities prior to 1936, they were required to deliver them to the Directorate of Antiquities within 30 days of the law’s enactment. Thereafter, anyone who accidentally discovered a movable antiquity was required to notify the government within seven days. The Directorate was authorized to provide a reward, to allow the sale of antiquities whose loss would not impair the value of Iraq’s museums, and to exchange certain antiquities so long as the exchange increased the value of Iraq’s museum collections. The Directorate could also allow for antiquities to temporarily leave the country for scientific studies, exchange, and exhibitions. But no antiquity could be removed from Iraq permanently. Finally, all antiquities discovered during authorized excavations belonged to the State; but the excavator was entitled to a reward and could export collections of potsherds and organic materials for study.

Under the 1936 law, any antiquities that had been possessed prior to 1936 and properly registered within 30 days of the law’s enactment could be sold within Iraq if approved by the Directorate. Faced with increased looting and smuggling, however, Iraq passed Law No. 120 of 1974: “it is hereby prohibited to possess antiquities and trade in them.” Law No. 164 of 1975 reaffirmed State ownership of cultural objects and the illegality of any trade in antiquities.

In 2002, Iraq adopted Antiquities and Heritage Law No. 55, maintaining the definitions and protections in effect since 1936. Thus, antiquities are still defined as movable and immovable objects of not less than 200 years, the State still retained ownership of all cultural

objects, and any trade in antiquities was still prohibited. Indeed, in response to another increase in looting and smuggling, the 2002 law instituted the death penalty for “[a]nyone who knowingly takes an article of antiquity out of Iraq.” Moreover, any transfer of ownership or possession still requires consent of the Directorate, such transfers may be only to those residing within Iraq, and any person who discovers an antiquity must report the discovery to the government. Antiquities recovered during authorized excavations remained the property of the State, but broken pieces of pottery and organic material could be exported for study. The Directorate retained the authority to permit the temporary export of movable antiquities for scientific study, conservation or temporary display; but the permanent export of antiquities was still prohibited.

After the 2003 war, Iraq’s new constitution of 2005 reaffirmed State ownership of all antiquities and archaeological remains: “[a]ntiquities, archeological sites, cultural buildings, manuscripts, and coins shall be considered national treasures under the jurisdiction of the federal authorities.”

Israel

According to Dr. Gerstenblith, the geographic area that today comprises Lebanon, Jordan, the Palestinian Authority, and Israel, including the Gaza Strip and the West Bank, were once part of the Ottoman Empire, whose 1884 Antiquities Law vested ownership of all antiquities in the State and prohibited export without the permission of the Imperial Museum in Istanbul. Following the First World War, the area of Jordan, the Palestinian Authority, and Israel became part of the British Mandate, whose 1920 Antiquities Ordinance vested ownership of cultural heritage in the Civil Government of Palestine but allowed the sale of

antiquities not considered necessary for the national repository. Then in 1929, Antiquities Ordinance No. 51 established that a landowner or finder of an antiquity had no rights or interest in an antiquity, could not transfer or dispose of it, and had to notify the government of any find—giving the government the right to acquire that antiquity upon payment of an award. The Ordinance further regulated the trade in antiquities, requiring a license to trade in antiquities or export them.

When Israel became an independent country in 1948, it reinstated the Antiquities Ordinance of 1929, which remained in effect until 1978 when Israel enacted Antiquities Law 5738-1978. This statute vests ownership of all antiquities discovered after 1978 in the State, and defines antiquities as “[a]ny object ... made by man before the year 1700.” A person who discovers an antiquity other than through a licensed excavation must notify the Antiquities Authority within 15 days of the discovery. The law does allow a legal trade in antiquities discovered before 1978 to continue, but only if the dealer is licensed and only after the seller notifies the State, which has the right to purchase the antiquity. The law forbids the export of any “antiquity of national value” without the written approval of the Minister of Education and Culture. The law also forbids the export of “any other antiquity” without the written approval of the Director of the Department of Antiquities and Museums of the Ministry of Education and Culture. In an effort to curtail the looting of sites in the West Bank and the Gaza Strip and the bringing of looted objects to Israel for sale, the Israeli law was amended in 2002 to prohibit the bringing of antiquities from either the West Bank or Gaza into Israel without the permission of the State.

After the end of the British Mandate, the area of the West Bank was covered by

Jordanian law. In 1966, Jordan's Law of Antiquities defined antiquities as "any movable or immovable object which was made, written, inscribed, built, discovered, or modified by a human being before the year 1700 A.D." Vesting ownership of antiquities in the State, the law required that any person who discovered an antiquity and who did not have a permit to excavate was required to report the discovery to the government within three days. Trade in antiquities was permitted, but all those engaged in the trade had to be licensed, and records had to be kept of all transactions. Export of antiquities required a permit and export could be prohibited for any antiquities "deemed necessary to remain in the Hashemite Kingdom of Jordan for public interest." After taking control of the West Bank in the Six-Days War, Israeli authorities introduced Military Order No. 1166 of 1986, which prohibited the export of any antiquity outside of the West Bank (excluding East Jerusalem) without a license and required permission from the State to export any antiquities from the West Bank. Since adoption of the Oslo Accords in 1993, the area of the West Bank has been divided into three sectors with sector A under the control of the Palestinian Authority, sector C under the control of Israel, and sector B under their joint control.

Italy

According to Ms. Davis, the first antiquities law of the modern Italian State was enacted in 1902 with Law No. 185. This law established that all movable objects that have archaeological or artistic value are subject to the provision of the law. Under this Law, public collections of art and antiquities are inalienable and could not, therefore, be sold or transferred. In 1909, Italy passed Law No. 364, which vested in the State ownership of all antiquities found by chance or during archaeological excavations within the borders of Italy

(Article 15.3). It also established that it is illegal to export items of historic, archaeological, or artistic value out of the Kingdom (Article 8).

In 1939, Law No. 1089, “Protection of Objects of Artistic and Historical Interest,” continued to vest in the State ownership of all antiquities, clarifying that all unearthed ancient artifacts discovered after 1902 belonged to the State. The law protected all “movable and immovable things of artistic, historic, archaeological or ethnological interest.” It also regulated their excavation and exportation. Together, Law No. 185 (1902), Law No. 364 (1909), and Law No. 1089 (1939) establish a broad legal regime that protected archaeological sites and objects, vested the ownership of undiscovered antiquities in the state, and continued to act as the means by which the government enforced its domestic and international patrimony policies.

In 2004, Italy enacted the Code of Cultural Property and Landscape. Although this Code replaced the 1939 law (which had been enacted under a fascist regime), the 2004 code maintains the ownership regime established in the 1939 law.

Jordan

According to Dr. Gerstenblith, the geographic area that today comprises Lebanon, Jordan, the Palestinian Authority, and Israel, including the Gaza Strip and the West Bank, were once part of the Ottoman Empire, whose 1884 Antiquities Law vested ownership of all antiquities in the State and prohibited export without the permission of the Imperial Museum in Istanbul. Following the First World War, the area of Jordan, the Palestinian Authority, and Israel became part of the British Mandate, whose 1920 Antiquities Ordinance vested ownership of cultural heritage in the Civil Government of Palestine but allowed the sale of

antiquities not considered necessary for the national repository. Then in 1929, Antiquities Ordinance No. 51 established that a landowner or finder of an antiquity had no rights or interest in an antiquity, could not transfer or dispose of it, and had to notify the government of any find—giving the government the right to acquire that antiquity upon payment of an award. The Ordinance further regulated the trade in antiquities, requiring a license to trade in antiquities or export them.

Jordan has had legislation protecting antiquities since 1934 (Law No. 24). In 1953, dealers were required to be licensed (Antiquities Order No. 1). In 1966, Jordan enacted a Law of Antiquities, defining antiquities as “any movable or immovable object which was made, written, inscribed, built, discovered, or modified by a human being before the year 1700 A.D.” Vesting ownership to antiquities in the State, the law required that any person who discovered an antiquity and who did not have a permit to excavate was required to report the discovery to the government within three days. Trade in antiquities was permitted, but all those engaged in the trade had to be licensed, and records had to be kept of all transactions. Export of antiquities required a permit and export could be prohibited for any antiquities “deemed necessary to remain in the Hashemite Kingdom of Jordan for public interest.” In 1968, Jordan adopted Law No. 26 on Antiquities, continuing the provisions of 1966. Then, in 1976, Provisional Law No. 12 prohibited all trade in antiquities, cancelling all trading licenses, establishing that all previously possessed antiquities be registered with the Department of Antiquities, and prohibiting the disposition by any means of any antiquity without the permission of the Department. The primary law in effect today is Law No. 21 of 1988, which continues the prohibition on trade in antiquities. Under its provisions, no transport, export,

or sale of movable antiquities outside Jordan is permitted without the approval of the Cabinet. Moreover, no movable antiquities may be privately “owned”—although they may be privately “possessed” after providing the government an inventory of the holdings and with government permission. Finally, Jordan is the owner of any new antiquities found during excavations carried out with a license, and any person who discovers any antiquities must report them to the government within ten days.

Lebanon

According to Dr. Gerstenblith, the geographic area that today comprises Lebanon, Jordan, the Palestinian Authority, and Israel, including the Gaza Strip and the West Bank, were once part of the Ottoman Empire, whose 1884 Antiquities Law vested ownership of all antiquities in the State and prohibited export without the permission of the Imperial Museum in Istanbul. Following the First World War, the area of Jordan, the Palestinian Authority, and Israel became part of the British Mandate, whose 1920 Antiquities Ordinance vested ownership of cultural heritage in the Civil Government of Palestine but allowed the sale of antiquities not considered necessary for the national repository. Then in 1929, Antiquities Ordinance No. 51 established that a landowner or finder of an antiquity had no rights or interest in an antiquity, could not transfer or dispose of it, and had to notify the government of any find—giving the government the right to acquire that antiquity upon payment of an award. The Ordinance further regulated the trade in antiquities, requiring a license to trade in antiquities or export them.

The earliest legal provisions concerning movement of cultural objects for Lebanon were enacted under the French Mandate. The first was Decision No. 651 (1926): a regional

agreement with Britain to prohibit the import of archaeological artifacts from the area of the British Mandate without proper authorization. The Regulation on Antiquities, Arrêté No. 166 (1933), was the first detailed legislation concerning the regulation of antiquities, and is still in effect. It provides that movable antiquities discovered through licensed excavations belong to the State, and that any antiquities discovered by chance (even on the owner's land) be reported to the government. Only if the government chooses not to acquire the antiquity may the discoverer maintain possession. Finally, the export of antiquities from Lebanon has been banned since 1988 under Ministerial Decision no. 8 dated February 6, 1988, effective since its publication in the "official journal" February 18, 1988.

Libya

According to Dr. Gerstenblith, the Ottomans—whose empire included Libya until 1911—adopted the first decrees in 1869 and 1873 regulating antiquities, including a prohibition on any export. The 1884 Antiquities Decree expanded the definition of artifacts to which State ownership applied, vesting ownership of all types of antiquities in the State and prohibiting export without permission of the Imperial Museum in Istanbul. After 1911, the area of Libya was under Italian control until the end of the Second World War, and then it was under United Nations administration from 1943 until Libya gained its independence in 1951. While under Italian control, Libya's cultural heritage was subject to the Italian system of regional Superintendencies and Italy's law of 1939, including the vesting of ownership of antiquities in the State.

Following Italian control, Law Number 11 on Antiquities, Archaeological Sites, and Museums (1953), Law No. 2 (1983) and Law No. 3 (1994) established protections and

regulation of antiquities. Both the 1953 Law and Law Number 2 of 1983 regarded the State as the owner of record for cultural heritage resources that are older than 100 years. Law No. 2 assigns supervision of museums, relics, and documents to the Department of Antiquities. Between 1968 and 1983, foreign archaeological expeditions were allowed to remove duplicate pieces (that is, pieces that had a close analogue in the national collection). Foreign institutions that acquired antiquities during this narrow time frame kept detailed records of their method of acquisition. The 1983 Law No. 2 established definitions, including that an archaeological object is “anything that has been made or manufactured by man and which relates to the human heritage and can be dated back 100 or more years.” The State claimed as “public treasure” all movable and immovable archaeological materials under or on the surface, except for “those cultural properties recorded within private collections.” Export of antiquities was prohibited for any purpose.

Law Number 3 of 1994 for the Protection of Antiquities, Museums, Old Cities and Historical Buildings constitutes the current legal regulation of antiquities. Under this law, textual and inscribed materials, such as manuscripts and other documents, need be only fifty years old to qualify as an antiquity. Under Article 5, “All immovable and movable antiquities and documents are considered public wealth, whether underground, on the surface, or below regional waters.” The only exception is cultural objects already recorded with the authorities as being in private collections under prior legislation. Anyone in possession of an antiquity before the law came into effect was required to register it with the competent authority within six months of this law coming into effect. The competent authority could choose to acquire the antiquity or return it with a certificate of ownership. A permit is required for collecting,

acquiring, or disposing of antiquities. Any excavation must be licensed by the competent authority. No landowner has the right to excavate to search for antiquities. Article 26 also clarifies that the State owns all antiquities discovered through licensed excavations and all objects in museums regardless of their age. Anyone who discovers an antiquity by chance or during construction work must notify the competent authorities or the police within five days.

Owners of registered antiquities may not dispose of them in any way without first obtaining the approval of the competent authority, which has the first right to purchase the antiquity. Trade in antiquities is prohibited. Only those antiquities that were in private possession before the law went into effect and registered with the state may be disposed of by transferring them to the State in exchange for compensation. Permission of the competent authority is required for any transfer of antiquities. It is prohibited to export documents and “traditional crafts that have archaeological character.”

Syria

According to Dr. Gerstenblith, the area that is today the Syrian Arab Republic was part of the Ottoman Empire until the end of the First World War. The Ottoman government enacted the Antiquities Law of 1874 decreeing that the Imperial Museum (now the Archaeological Museum of Istanbul) receive one-third of all artifacts recovered through excavations, with the remainder divided between excavator and landowner. Antiquities that were discovered fortuitously, however, belonged to the State. The subsequent 1884 Antiquities Law vested ownership of all antiquities in the State and prohibited export without the permission of the Imperial Museum in Istanbul.

Following the First World War, Syria became part of the French Mandate. In 1922, the

League of Nations approved the Mandate, defining an antiquity as any “product of human activity” that predated 1700 AD. Under the Mandate, any person who discovered an antiquity was required to report the discovery to the government, any export of antiquities required a license, and the government had the right of acquisition to any antiquity. Any antiquities discovered during authorized excavations, however, could be divided between the excavator and the government.

In 1933, the Decree Setting Forth the Regulations Governing Antiquities, enacted by the French Mandate, applied to both Syria and Lebanon and remain in effect until Syria’s independence in 1946. The Decree defined antiquities as any immovable or movable remains of human activity from before 1700 AD; established that any antiquities discovered by chance had to be reported to the government, which had right of acquisition; and established State ownership over movable antiquities discovered through licensed excavations—although a portion of the finds might be handed over to an excavation team under the system of *partage* (or division of finds). The Decree also regulated the sale of movable antiquities, requiring that all dealers be authorized; that dealers register all acquisitions and sales; that antiquity could be exported without a government-issued permit; and giving the government the right of acquisition before any antiquity was exported.

The present law, Antiquities Law, Decree No. 222, was enacted in 1963. Defining antiquities as “movable and immovable properties built, manufactured, produced, written or drawn by man that date back to at least two hundred Christian years,” the 1963 law established that “all movable and immovable antiquities, and antiquities placed in the Syrian Arab Republic are public properties of the State.” Movable antiquities may be considered immovable if “they

are parts or decorations of immovable antiquities.” Movable antiquities cannot be sold or given away, but where there are large numbers of similar objects, they may be sold or exchanged with museums and scientific institutions through Presidential Decree. Individuals and organizations that have collections must register any “important objects;” movable antiquities require governmental approval to be transferred; and any discoveries of movable antiquities must be reported to the government, which has the right of acquisition. All excavations require a permit, and any antiquities discovered are the property of the State, although the government may give some antiquities to licensed excavators on the condition that they display the artifacts in a public museum or a museum affiliated with scientific institutions.

Law #1 of 1999 prohibited all trading in, and export of, antiquities--although export permits may be granted for antiquities exchanged with museums and scientific associations that have carried out official excavations.

Turkey

According to Dr. Gerstenblith, the Ottoman Empire ruled the area that today is called Turkey until the end of the First World War. In 1874, the Ottoman government enacted its first antiquities law, decreeing that the Imperial Museum (now the Archaeological Museum of Istanbul) receive one-third of all artifacts recovered through excavations and that all antiquities discovered fortuitously belonged to the State. The 1884 Antiquities Decree expanded the definition of artifacts to which State ownership applied, vesting ownership of all types of antiquities in the State and prohibiting export without permission of the Imperial Museum in Istanbul. This Decree is the basis for all subsequent antiquities’ legislation in Turkey. A third

Ottoman law, enacted in 1906, removed the exception that allowed landowners to acquire chance finds and established State ownership over all antiquities. After Turkey's Independence in 1923, State ownership of all antiquities was restated in Art. 697 of the 1926 Turkish Civil Code—with this provision still in effect today as Art. 773 of the 2001 Turkish Civil Code.

The Antiquities Law of 1973 also maintained State ownership, but it was replaced by 1983's Law no. 2863 on the Protection of Natural and Cultural Property of 21 July 1983. Still in effect today, it defines “cultural property” as “movable and immovable property on the ground, under the ground or under the water pertaining to science, culture, religion and fine arts of before and after recorded history or that is of unique scientific and cultural value for social life before and after recorded history.” The law states that “movable and immovable cultural and natural property to be protected that is known to exist or will be discovered ... shall have the quality of state property.” This provision applies regardless of whether the cultural property is discovered on public or private land and applies to “[a]ll kind of cultural and natural property from geological periods, prehistory, and recorded history, having documentary value in terms of geology, anthropology, prehistory, archaeology and art history reflecting the social, cultural, technical and scientific characteristics and level of the period they belong to.” Coins minted after 1839 are not subject to State ownership and may be freely traded within Turkey.

The Ministry of Culture and Tourism has the exclusive right to excavate, and all movable cultural property discovered through excavation must be brought to a state museum. Similarly, the discoverer of cultural property, regardless of where the cultural property is located, must notify the nearest museum or other local government authority within three days

of the discovery. Any antiquities not turned over to the government upon discovery belong to the government. Cultural property that does not meet the definition of property “to be protected” and not needed to be placed in a museum may be returned but with documentation. Movable cultural property that does meet the definition of cultural property “to be protected” may not be taken out of the country without permission of the Council of Ministers.

Conclusion

Based on the evidence developed during the criminal investigation into Michael Steinhardt’s acquisition, possession, and sale of antiquities, this Office has concluded that the 180 Seized Antiquities were looted and illegally smuggled out of their respective countries of origin, thereby rendering each of the them stolen property under New York criminal law. As a result, this Office applied for and received pursuant to New York Criminal Procedure Law §690.10 judicially authorized warrants to seize each of the antiquities that are in the United States. As previously discussed, 9 of 180 Seized Antiquities have not been located yet—the Red Carnelian Sun Fish Amulet, Sword, and 7 objects from the Ivory Set—but will be seized and repatriated as soon as they are found. And 3 of the 180 Seized Antiquities—the Heliodorus Stele and two Neolithic Death Masks—are on loan from Steinhardt to the Israel Museum in Jerusalem. Israeli law-enforcement authorities have been notified of the findings of this investigation and the three antiquities are effectively seized in place. Because these three antiquities are at the Israel Museum as part of the private, and not public, collection, each will be transferred to the Israeli government.

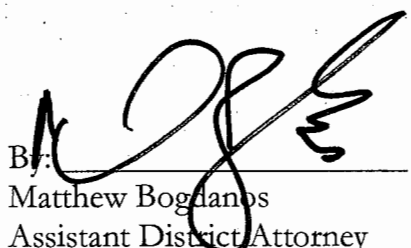
Under New York Penal Law §450.10(5), therefore, the 180 Seized Antiquities must be returned to their owner countries. *People v. Museum of Modern Art (In re Grand Jury Subpoena Duces*

Tecum), 93 N.Y. 2d 729 (1999) (N.Y. Penal Law §450.10 “provides a mechanism for returning allegedly stolen property to an owner prior to, or during the pendency of, a criminal proceeding”). Further, N.Y. County Law §935 mandates the return of seized property to its rightful owner: “[a]ll property delivered into the custody and held and kept by the district attorney of the county of New York, for use as evidence or otherwise, in any criminal investigation, action, appeal, or other proceeding, shall be returned by him to its rightful owner upon proper demand therefore.” This Office will, therefore, repatriate to each of the victim countries their priceless cultural heritage without additional delay.

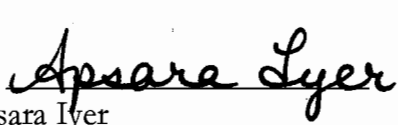
This Office has a long tradition of promoting respect for the rule of law by bringing justice to victims of crime—no matter who they are or where they are. We are honored to have been able to continue that tradition here.

Dated New York, New York

December 2 2021

By: 
Matthew Bogdanos
Assistant District Attorney

Cyrus Vance Jr.
District Attorney

By: 
Apsara Iyer
Antiquities Trafficking Analyst

Attachment A

<u>Piece #</u>	<u>Name</u>	<u>Exhibit #</u>	<u>Country</u>	<u>Purchase Price</u>	<u>Current Value</u>
1	Bull's Head	1	Lebanon	\$700,000	\$12,000,000
2	Calf Bearer	2	Lebanon	\$2,000,000	\$10,000,000
3	Sardinian Idol	3	Italy	\$675,000	\$1,200,000
4	Togate Figure	4	Italy	\$800,000	\$1,000,000
5	Eos Carrying Cephalus	5	Italy	\$100,000	\$250,000
6	Bronze Pegasus 1	6	Italy	\$200,000	\$200,000
7	Bronze Pegasus 2	6	Italy	\$200,000	\$200,000
8	Villanova Helmet	7	Italy	\$180,000	\$300,000
9	Terracotta Panel 1	8	Italy	\$435,000	\$600,000
10	Terracotta Panel 2	8	Italy	Included in above	Included in above
11	Sphinx Kylix	9	Italy	\$310,000	\$310,000
12	Berlin Painter Oinochoe	10	Italy	\$215,000	\$500,000
13	Leagros Hydria	11	Italy	\$127,000	\$250,000
14	Antimenes Hydria	12	Italy	\$169,411	\$400,000
15	Attic African Head Aryballos	13	Italy	\$163,313	\$200,000
16	Proto-Corinthian Duck	14	Italy	\$130,000	\$200,000
17	Proto-Corinthian Owl	15	Italy	\$120,000	\$200,000
18	Ionian Ram's Head	16	Italy	\$70,000	\$100,000
19	Corinthian Bull's Head	17	Italy	\$60,000	\$80,000
20	Corinthian Lion Vessel	18	Italy	\$25,000	\$40,000
21	Faliscan Askos	19	Italy	\$55,000	\$75,000
22	Marble Oscillum 1	20	Italy	\$175,000	\$400,000
23	Marble Oscillum 2	20	Italy	Included in above	Included in above
24	Marble Oscillum 3	20	Italy	Included in above	Included in above
25	Marble Oscillum 4	20	Italy	Included in above	Included in above
26	Spouted Bowl	21	Greece	\$500,000	\$600,000
27	Apulian African Head Flask	22	Italy	\$130,000	\$200,000
28	Italo-Corinthian Duck Vessel	23	Italy	\$25,000	\$40,000
29	Bronze Gorgon 1	24	Italy	\$150,000	\$250,000
30	Bronze Gorgon 2	24	Italy	Included in above	Included in above
31	Bronze Gorgon 3	24	Italy	Included in above	Included in above
32	Etruscan White-Ground Aryballos	25	Italy	\$55,000	\$75,000
33	Geometric Oinochoe	26	Greece	\$23,485	\$30,000
34	Figulina Plate	27	Italy	\$48,375	\$52,000

Included in above = priced as group

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<u>Piece #</u>	<u>Name</u>	<u>Exhibit #</u>	<u>Country</u>	<u>Purchase Price</u>	<u>Current Value</u>
35	Attic Black-Figure Eye Kylix	28	Italy	\$170,750	\$350,000
36	Bronze Handle 1	29	Italy	\$92,500	\$100,000
37	Bronze Handle 2	29	Italy	Included in above	Included in above
38	Etruscan Panel 1	30	Italy	\$155,000	\$300,000
39	Etruscan Panel 2	30	Italy	Included in above	Included in above
40	Etruscan Panel 3	30	Italy	Included in above	Included in above
41	Etruscan Panel 4	30	Italy	Included in above	Included in above
42	Polychromed Terracotta Antefix	31	Italy	\$10,000	\$50,000
43	Corinthian Aryballos In The Form Of A Helmeted Head	32	Italy	\$5,000	\$7,500
44	Attic Black-Figure Amphora	33	Italy	\$13,000	\$20,000
45	Archaic Faience Aryballos 1	34	Italy	\$12,000	\$20,000
46	Archaic Faience Aryballos 2	34	Italy	Included in above	Included in above
47	Faience Baboon	35	Italy	\$9,000	\$10,000
48	Attic Black-Figure Plemochoe	36	Italy	\$84,083	\$90,000
49	Bronze Oinochoe	37	Italy	\$180,000	\$185,000
50	White-Ground Lekythos	38	Greece	\$380,000	\$400,000
51	Ivory Plaque	39	Iraq	\$400,000	\$450,000
52	Situla	40	Italy	\$250,000	\$320,000
53	Warrior	41	Italy	\$320,000	\$320,000
54	Rider	41	Italy	Included in above	Included in above
55	Antelope Standard	42	Turkey	\$84,000	\$100,000
56	Bird Rattle 1	42	Turkey	Included in above	Included in above
57	Bird Rattle 2	42	Turkey	Included in above	Included in above
58	Kouros	43	Greece	\$2,348,500	\$14,000,000
59	Griffin Cauldron with Stand	44	Italy	\$3,000,000	\$3,500,000
60	Gold Broach	45	Greece	\$728,000	\$1,300,000
61	Minoan Hoard 1	46	Greece	\$92,000	\$150,000
62	Minoan Hoard 2	46	Greece	Included in above	Included in above
63	Minoan Hoard 3	46	Greece	Included in above	Included in above

Included in above = priced as group

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<u>Piece #</u>	<u>Name</u>	<u>Exhibit #</u>	<u>Country</u>	<u>Purchase Price</u>	<u>Current Value</u>
64	Minoan Hoard 4	46	Greece	Included in above	Included in above
65	Minoan Hoard 5	46	Greece	Included in above	Included in above
66	Minoan Hoard 6	46	Greece	Included in above	Included in above
67	Minoan Hoard 7	46	Greece	Included in above	Included in above
68	Minoan Hoard 8	46	Greece	Included in above	Included in above
69	Minoan Hoard 9	46	Greece	Included in above	Included in above
70	Minoan Hoard 10	46	Greece	Included in above	Included in above
71	Minoan Hoard 11	46	Greece	Included in above	Included in above
72	Minoan Hoard 12	46	Greece	Included in above	Included in above
73	Minoan Hoard 13	46	Greece	Included in above	Included in above
74	Minoan Hoard 14	46	Greece	Included in above	Included in above
75	Minoan Hoard 15	46	Greece	Included in above	Included in above
76	Minoan Hoard 16	46	Greece	Included in above	Included in above
77	Minoan Hoard 17	46	Greece	Included in above	Included in above
78	Minoan Hoard 18	46	Greece	Included in above	Included in above
79	Minoan Hoard 19	46	Greece	Included in above	Included in above
80	Minoan Hoard 20	46	Greece	Included in above	Included in above
81	Minoan Hoard 21	46	Greece	Included in above	Included in above
82	Minoan Hoard 22	46	Greece	Included in above	Included in above
83	Minoan Hoard 23	46	Greece	Included in above	Included in above

Included in above = priced as group

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<u>Piece #</u>	<u>Name</u>	<u>Exhibit #</u>	<u>Country</u>	<u>Purchase Price</u>	<u>Current Value</u>
84	Minoan Hoard 24	46	Greece	Included in above	Included in above
85	Minoan Hoard 25	46	Greece	Included in above	Included in above
86	Minoan Hoard 26	46	Greece	Included in above	Included in above
87	Minoan Hoard 27	46	Greece	Included in above	Included in above
88	Minoan Hoard 28	46	Greece	Included in above	Included in above
89	Minoan Hoard 29	46	Greece	Included in above	Included in above
90	Minoan Hoard 30	46	Greece	Included in above	Included in above
91	Minoan Hoard 31	46	Greece	Included in above	Included in above
92	Minoan Hoard 32	46	Greece	Included in above	Included in above
93	Minoan Hoard 33	46	Greece	Included in above	Included in above
94	Female Figurine	47	Turkey	\$499,294	\$800,000
95	Gold Dress Ornament 1	47	Turkey	Included in above	Included in above
96	Gold Dress Ornament 2	47	Turkey	Included in above	Included in above
97	Gold Dress Ornament 3	47	Turkey	Included in above	Included in above
98	Gold Dress Ornament 4	47	Turkey	Included in above	Included in above
99	Gold Dress Ornament 5	47	Turkey	Included in above	Included in above
100	Gold Dress Ornament 6	47	Turkey	Included in above	Included in above
101	Gold Dress Ornament 7	47	Turkey	Included in above	Included in above
102	Nude Female Statuette	48	Syria	\$28,000	\$35,000
103	Stag's Head Rhyton	49	Turkey	\$2,600,000	\$3,500,000
104	Syro-Hittite Idol A1989.20	50	Syria	\$15,000	\$100,000
105	Syro-Hittite Idol A1992.12	50	Syria	\$9,000	\$35,000
106	Syro-Hittite Idol A1992.30	50	Syria	\$5,000	\$25,000

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<u>Piece #</u>	<u>Name</u>	<u>Exhibit #</u>	<u>Country</u>	<u>Purchase Price</u>	<u>Current Value</u>
107	Orpheus Mosaic	51	Italy	\$440,000	\$800,000
108	Anatolian Terracotta Idol	52	Turkey	\$79,610	\$85,000
109	Larnax	53	Greece	\$575,000	\$1,000,000
110	Idol	54	Greece	\$100,000	\$100,000
111	Plate	55	Greece	\$15,000	\$35,000
112	Kandila	56	Greece	\$75,000	\$75,000
113	Cycladic Cup	57	Greece	\$20,000	\$25,000
114	Cycladic Plate	58	Greece	\$10,000	\$30,000
115	Bronze Griffin Protome	59	Greece	\$350,000	\$400,000
116	Small Anatolian Limestone Idol	60	Turkey	\$47,500	\$50,000
117	Carved Ivory Head (Larger)	61	Israel	\$25,000	\$25,000
118	Carved Ivory Head (Smaller)	62	Israel	\$15,000	\$15,000
119	Red Carnelian Sun Fish Amulet	63	Israel	\$6,818	\$7,000
120	Cosmetic Spoon	64	Israel	\$6,000	\$6,500
121	Pin with Hand Holding Olive Wreath	65	Israel	\$2,500	\$3,000
122	Sword	66	Israel	\$30,000	\$35,000
123	Ivory Set 1	67	Israel	\$45,000	\$50,000
124	Ivory Set 2	67	Israel	Included in above	Included in above
125	Ivory Set 3	67	Israel	Included in above	Included in above
126	Ivory Set 4	67	Israel	Included in above	Included in above
127	Ivory Set 5	67	Israel	Included in above	Included in above
128	Ivory Set 6	67	Israel	Included in above	Included in above
129	Ivory Set 7	67	Israel	Included in above	Included in above
130	Ivory Set 8	67	Israel	Included in above	Included in above
131	Ivory Set 9	67	Israel	Included in above	Included in above
132	Ivory Set 10	67	Israel	Included in above	Included in above
133	Ivory Set 11	67	Israel	Included in above	Included in above
134	Ivory Set 12	67	Israel	Included in above	Included in above

Included in above = priced as group

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<u>Piece #</u>	<u>Name</u>	<u>Exhibit #</u>	<u>Country</u>	<u>Purchase Price</u>	<u>Current Value</u>
135	Ivory Set 13	67	Israel	Included in above	Included in above
136	Ivory Set 14	67	Israel	Included in above	Included in above
137	Ivory Set 15	67	Israel	Included in above	Included in above
138	Ivory Set 16	67	Israel	Included in above	Included in above
139	Death Mask 1	68	Israel	\$400,000	\$650,000
140	Death Mask 2	68	Israel	Included in above	Included in above
141	Death Mask 3	68	Israel	Included in above	Included in above
142	Stone Skull	69	Israel	\$100,000	\$250,000
143	Incense Burner with Ducks, Goats, and Gazelle	70	Israel	\$48,000	\$70,000
144	Baboon Amulet	71	Israel	\$6,000	\$7,000
145	Heliodorus Stele	72	Israel	\$375,000	\$435,000
146	Vase from the Pan-Athenian Games	73	Egypt	\$300,000	\$300,000
147	Gold Mask	74	Israel	\$100,000	\$250,000
148	Gold Mask	74	Israel	\$100,000	\$250,000
149	Neolithic Mask A1991.23a	75	Israel	Unknown	\$250,000
150	Neolithic Mask A1991.23b	75	Israel	Unknown	\$100,000
151	Neolithic Mask A1991.23d	75	Israel	Unknown	\$600,000
152	Neolithic Mask A1991.23e	75	Israel	Unknown	\$1,000,000
153	Neolithic Mask A1991.23f	75	Israel	Unknown	\$600,000
154	Neolithic Bull 1	76	Jordan	\$375,000	\$500,000
155	Neolithic Bull 2	76	Jordan	Included in above	Included in above
156	Neolithic Bull 3	76	Jordan	Included in above	Included in above
157	Neolithic Bull 4	76	Jordan	Included in above	Included in above
158	Neolithic Female	77	Israel	Unknown	\$100,000
159	Teracotta Temple 1	78	Israel	\$2,000	\$25,000
160	Teracotta Temple 2	78	Israel	\$2,000	\$20,000
161	Teracotta Temple 3	78	Israel	\$2,000	\$10,000
162	Chalcolithic Altar	79	Jordan	\$10,000	\$30,000
163	Tel El-Yahudiyeh Beer Strainer	80	Egypt	\$5,000	\$20,000
164	Tombstone from Zoar 1	81	Jordan	\$20,000	\$30,000

Included in above = priced as group

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<u>Piece #</u>	<u>Name</u>	<u>Exhibit #</u>	<u>Country</u>	<u>Purchase Price</u>	<u>Current Value</u>
165	Tombstone from Zoar 2	81	Jordan	\$20,000	\$30,000
166	Astarte	82	Jordan	\$15,000	\$20,000
167	Bronze Pitcher with Snake Shaped Handle	83	Jordan	\$15,000	\$20,000
168	Statue of a Winged Human	84	Egypt	\$25,000	\$30,000
169	Ivory Carving	85	Egypt	Unknown	\$350,000
170	Egyptian Hoard 1	86	Egypt	\$70,000	\$150,000
171	Egyptian Hoard 2	86	Egypt	Included in above	Included in above
172	Egyptian Hoard 3	86	Egypt	Included in above	Included in above
173	Egyptian Hoard 4	86	Egypt	Included in above	Included in above
174	Egyptian Hoard 5	86	Egypt	Included in above	Included in above
175	Ercolano Fresco	87	Italy	\$650,000	\$1,000,000
176	Glass Oinochoe	88	Greece	\$433,500	\$850,000
177	Statue of a Woman	89	Greece	\$650,000	\$1,300,000
178	Veiled Head of a Female	90	Libya	\$1,200,000	\$1,200,000
179	Gold Bowl	91	Iraq	\$150,000	\$200,000
180	Helmet	92	Bulgaria	\$175,000	\$200,000
				\$26,422,639	\$69,508,000

Included in above = priced as group

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1. **Anne-Marie Afeiche (Lebanon)**, Former Director General at the General Council of Museums within Lebanon's Ministry of Culture. Ms. Afeiche is an expert in Lebanese antiquities, museum professional, and the former Editor-in-Chief of *Bulletin d'Archéologie et d'Architecture Libanaise*. In 1999, she supervised the reopening of the National Museum of Beirut. In this role, Ms. Afeiche compiled dossiers on the illicit market for Lebanese antiquities.

2. **Shaaban Abdel Gawad (Egypt)**, Director General of the Repatriation of Antiquities Department within Egypt's Ministry of Antiquities. Mr. Abdel Gawad directs Egypt's efforts to identify, analyze, and recover stolen Egyptian antiquities. In this role, Mr. Abdel Gawad has examined numerous real (and forged) Egyptian export permits.

3. **Dr. Amr Al-Azm (Syria)**, Professor of Middle East History and Anthropology at Shawnee State University. Dr. Al-Azm holds a Ph.D. in Archaeology from University College London. Dr. Al-Azm directs the Antiquities Trafficking and Heritage Anthropology Research (ATHAR) Project, an investigative initiative focused on the intersection of antiquities and transnational trafficking, terrorism financing, and organized crime. An expert in Syrian cultural heritage, Dr. Al-Azm has excavated numerous archaeological sites in Syria.

4. **Lynda Albertson (Italy)**, Chief Executive Officer of the Association for Research into Crimes against Art (ARCA). Ms. Albertson directs ARCA, an initiative to promote the study and research of art crime and cultural heritage protection. In this role, Ms. Albertson compiles dossiers on international trafficking networks and liaises with law enforcement globally.

5. **Dr. Lindsey Allen (Iran)**, Lecturer in Greek and Near Eastern History at the Department of Classics, Kings College London. Dr. Allen holds a Ph.D. from University

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College London and has held research fellowships at Wolfson College (Oxford) and the Warburg Institute. Dr. Allen is an expert in the history of the ancient Near East, especially the Achaemenid Persian empire and pre-Islamic Iran.

6. **Dr. Holger Baitinger (Bulgaria)**, Scientific Assistant at the Römisch-Germanisches Zentralmuseum (RGZM). Dr. Baitinger holds a Ph.D. from Ludwig Maximilians University. Dr. Baitinger is an expert on Mediterranean metallurgy and weaponry. Dr. Baitinger has particular expertise with material originating from Bulgaria, Italy, Greece, and Turkey.

7. **Morgan Belzic (Libya)**, Researcher at the Institut National D'Histoire de l'Art. An expert in Libyan archaeology, Mr. Belzic participated in the French archaeological missions in Libya and works closely with the Libya Department of Antiquities to identify looted Libyan objects on the international art market.

8. **Stephane Blumel (France)**, Officer at the Office Central de Lutte Contre le Trafic des Biens Culturels (OCBC), or Office for Combating Cultural Property Trafficking, in the French National Police. Officer Blumel directs investigative efforts on antiquities networks in France, to include law-enforcement activity involving targets of this Office.

9. **Zeynep Boz (Turkey)**, Head of Combatting Illicit Trafficking Department within Turkey's Ministry of Culture and Tourism. In her role, Ms. Boz documents illicit excavations in Turkey, identifies Turkish antiquities trafficked abroad, and coordinates the appropriate law-enforcement authorities to prevent the trafficking of antiquities.

10. **Dr. Silvia Cecchi (Italy)**, Deputy Public Prosecutor of Pesaro, Italy. Dr. Cecchi has been involved in numerous cases involving Italian cultural heritage trafficked abroad, to include the legal proceedings regarding the statue of a "Victorious Youth" at the Getty Museum.

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11. **Sandy Cobden (USA)**, Former Senior Vice President and General Counsel, Dispute Resolution & Legal Public Affairs at Christie's New York. In her prior role at Christie's, Ms. Cobden shaped the policies and practices on art-related matters and cultural property issues and served as Christie's liaison with law-enforcement.

12. **Lorenzo D'Ascia (Italy)**, Director of the Legislative Office within Italy's Ministry of Culture. A lawyer with Italy's State Attorney General, Mr. D'Ascia presides over Italy's Committee for the Return of Cultural Assets. Mr. D'Ascia has been involved with litigation and negotiations concerning repatriations of Italian antiquities from museums across the globe.

13. **Terressa Davis (Greece and Italy)**, Executive Director of the Antiquities Coalition. Ms. Davis is admitted to the New York State Bar 3rd Department and holds a J.D. from the University of Georgia and prior degree in archaeology from Boston University. An expert on cultural property issues, Ms. Davis has conducted extensive legal research on cultural property laws for Italy and Greece.

14. **Dr. Vincenzo d'Ercole (Italy)**, Archaeologist at Italy's Ministry of Culture's Directorate of Archaeology. Since 1979, Dr. d'Ercole has worked at the Ministry of Culture and has coordinated with the Carabinieri during on-going investigations involving looted Italian antiquities. Dr. d'Ercole has also supervised numerous excavations in Abruzzo and southern Etruria in central Italy.

15. **Brenton Easter (USA)**, Special Agent with Department of Homeland Security, Homeland Security Investigations (DHS-HSI). An agent with DHS-HSI since 2002, Special Agent Easter has investigated the interstate sale and transportation of stolen cultural property, the smuggling of contraband, and art fraud. As a Special Agent, he has led or joined teams of

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agents in the execution of hundreds of judicially-authorized search and arrest warrants seeking the arrest of individuals and recovery of evidence.

16. **Sarkis el-Khoury (Lebanon)**, Director-General of the Directorate General of Antiquities within Lebanon's Ministry of Culture. As the Director-General of Antiquities, Mr. el-Khoury is responsible for the protection of Lebanon's cultural heritage sites as well as its moveable heritage, such as antiquities. In this role, Mr. el-Khoury maintains registers of Lebanese archaeological sites and antiquities.

17. **Paolo Giorgio Ferri (Italy)**, Former Deputy Public Prosecutor in the Public Prosecutor's Office in Rome and Special Advisor to the Director-General of ICCROM. A graduate of Sapienza University in 1977, Mr. Ferri became a magistrate before joining the Public Prosecutor's Office in Rome where he led Italy's efforts to prosecute networks of illicit antiquities trafficking. Mr. Ferri led the prosecution of Giacomo Medici, Giovanni Franco Becchina, and other notable Italian traffickers. By the end of his career Mr. Ferri had identified more than 47 museums that possessed illicit Italian antiquities. Mr. Ferri passed away on June 14, 2020.

18. **Dr. Patty Gerstenblith (Egypt, Iraq, Israel, Jordan, Libya, Lebanon, Syria, and Turkey)**, Distinguished Professor at DePaul University College of Law and Faculty Director of the Center for Art, Museum and Cultural Heritage Law. Dr. Gerstenblith holds a Ph.D. in Fine Arts and Anthropology from Harvard University, and a JD from Northwestern University. As the author of the widely-published *Art, Cultural Heritage and the Law* casebook, Dr. Gerstenblith lectures on the international trade in art, particularly antiquities, and the protection of cultural heritage during armed conflict.

19. **Christopher Foulkes (USA)**, Program Manager of the Antiquities Unit within U.S.

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Customs and Border Protection. An officer with U.S. Customs and Border Protection, Officer Foulkes monitors all objects entering (or departing from) the United States with a focus on art and antiquities. In this role, Officer Foulkes is responsible for notifying appropriate law-enforcement authorities whenever objects possess improper customs paperwork or reflect other violations arising from the entry (or departure) of stolen property.

20. **Ilan Hadad (Israel)**, National Inspector for Antiquities Trading of the Antiquities Theft Prevention Unit within the Israel Antiquities Authority (IAA). As the head of the Antiquities Theft Prevention Unit, Mr. Hadad is responsible for investigating cases of looted Israeli antiquities, conducting witness interviews, and engaging in counter-trafficking efforts.

21. **Dr. Monica Hanna (Egypt)**, Egyptologist and Dean of the College of Archaeology and Cultural Heritage at the Arab Academy of Science, Technology, and Maritime Transport. Dr. Hanna holds a Ph.D. from the University of Pisa. An expert in Egyptology, Dr. Hanna founded Egypt's Heritage Task Force, which documents the destruction of cultural heritage across Egypt.

22. **Sophie Hayes (United Kingdom)**, Detective Constable in the Art and Antiquities Squad of the London Metropolitan Police, formally New Scotland Yard. Detective Constable Hayes investigates stolen cultural property in the United Kingdom, to include conducting law-enforcement activity involving targets of this Office.

23. **Stefan Holz (Germany)**, Head of the Art and Cultural Property Crime of Germany's Federal Criminal Police Office in Stuttgart. Mr. Holz investigates stolen cultural property in Germany, to include conducting law-enforcement activity involving targets of this Office.

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24. **Tom Jackson (United Kingdom)**, Detective Constable in the Art and Antiquities Squad of the London Metropolitan Police, formally New Scotland Yard. Detective Constable Jackson investigates stolen cultural property in the United Kingdom, to include conducting law-enforcement activity involving targets of this Office.

25. **Silvelie Karfeld (Germany)**, Officer in the Art and Cultural Property Crime of Germany's Federal Criminal Police Office. Ms. Karfeld investigates stolen cultural property in Germany, to include conducting law-enforcement activity involving targets of this Office.

26. **Dr. Ibrahim Kawkabani (Lebanon)**, Former Head of the Excavation Department at the Directorate General of Antiquities within Lebanon's Ministry of Culture. Dr. Kawkabani holds a Ph.D. in archaeology from the Sorbonne in Paris. From 1985 to 2002, Dr. Kawkabani was a Professor of Archaeology at Lebanese University. During his tenure as Head of the Excavation Department, Dr. Kawkabani was responsible for the transportation of antiquities excavated at Eshmun to the Jubayl/Byblos Citadel.

27. **Dr. Eitan Klein (Israel)**, Deputy Director of the Theft Prevention Unit within the Israel Antiquities Authority (IAA). Dr. Klein holds a Ph.D. in the Land of Israel Studies and Archaeology from Bar-Ilan University. An experienced archaeologist with a specialty in the Judean Foothills, Dr. Klein oversees the IAA's efforts to prevent antiquities trafficking by patrolling areas across Israel, maintaining inventory registers of licensed dealers of antiquities, and conducting investigations into trafficked Israeli antiquities.

28. **Ghattas Khoury (Lebanon)**, Former Minister of Culture of the Lebanese Republic. A distinguished surgeon and politician, Mr. Khoury served as a Member of Parliament in Lebanon before being selected to lead the Ministry of Culture in 2016. From 2016-2019, Mr.

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Khoury was responsible for overseeing Lebanon's heritage, antiquities, arts, literature, cultural industries and management of cultural and historical property.

29. **Dr. Elena Korka (Greece)**, Director General of Antiquities and Cultural Heritage of the Hellenic Ministry of Culture and Sports. Dr. Korka holds a Ph.D. from the National Kapodistrian University of Athens. An expert in Greek antiquities, Dr. Korka has extensive excavation experience at sites across Greece and has extensively researched the illicit removal of Greek cultural heritage.

30. **William Korner (United Kingdom)**, Former Manager of International Art Fairs at the Art Loss Register. In his role at the Art Loss Register, Mr. Korner advised national and international stakeholders of cultural property legislation and routinely liaised with international law-enforcement authorities on investigations concerning stolen cultural property.

31. **Jürgen Kühlmeyer (Germany)**, Chief Officer in the Art Crime Unit of Germany's Federal Criminal Police Office in Wiesbaden. Mr. Kühlmeyer investigates stolen cultural property in Germany, to include conducting law-enforcement activity involving targets of this Office.

32. **John Paul Labbat (USA)**, Special Agent with Department of Homeland Security, Homeland Security Investigations (DHS-HSI). An agent with DHS-HSI or its predecessor agencies since 1997, Special Agent Labbat investigates the interstate sale and transportation of stolen cultural property, the smuggling of contraband, and art fraud. As a Special Agent, he has led or joined teams of agents in the execution of hundreds of judicially-authorized search and arrest warrants seeking the arrest of individuals and recovery of evidence. Special Agent Labbat serves as the lead agent on the Steinhardt investigation.

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33. **Ahmad Lash (Jordan)**, Former Head of the Archaeological Loans Sector in the Excavation and Survey Directorate within Jordan's Department of Antiquities. An expert in Jordanian archaeology, Mr. Lash has conducted excavations at the sites of Al-Azraq, Amra, Tuba, Mushatta and Qastal in Jordan. Mr. Lash also leads MEGA Jordan, an initiative to inventory and track Jordanian archaeological sites nationwide.

34. **Tina Lenz (Germany)**, Officer in the Art Crime Unit within Germany's Federal Criminal Police Office in Wiesbaden. Mr. Kühlmeyer investigates stolen cultural property in Germany, to include conducting law-enforcement activity involving targets of this Office.

35. **Robert Mancene (USA)**, Special Agent with Department of Homeland Security, Homeland Security Investigations (DHS-HSI). An agent with DHS-HSI or its predecessor agencies since 1994, Special Agent Mancene investigates the interstate sale and transportation of stolen cultural property, the smuggling of contraband, and art fraud. As a Special Agent, he has led or joined teams of agents in the execution of hundreds of judicially-authorized search and arrest warrants seeking the arrest of individuals and recovery of evidence. Special Agent Mancene serves as the lead agent on the Almagià investigation.

36. **Fadwa Manea (Iraq)**, Third Secretary at the Embassy of the Republic of Iraq (Legal and Cultural Affairs). Consul Manea coordinates with Iraqi governmental agencies on cultural heritage policy and facilitates the examination of Iraqi antiquities by experts. As a liaison between the Iraqi Ministry of Culture and foreign law-enforcement, Consul Mena also serves to support on-going law-enforcement efforts related to antiquities trafficking.

37. **Marcel Marée (England)**, Assistant Keeper at the Department of Ancient Egypt & Sudan at the British Museum. Mr. Marée is an expert in Egyptian art and social history and has

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conducted fieldwork in Edfu and Elkab in Upper Egypt. As the Director of the British Museum's "Circulating Artifacts" (CirArt) initiative, Mr. Marée works to combat the illicit trade in Egyptian antiquities.

38. **Moshe Mizrachi (Israel)**, Homeland Security Investigations (HSI) Attaché in Israel. Mr. Mizrachi supports HSI efforts in Israel, to include supplying translations, collecting and transmitting documents, and liaising between local law-enforcement and U.S. authorities.

39. **Dr. Sara Neri (Italy)**, Archeologist Italy's Ministry of Culture. Dr. Neri holds a Ph.D. with a specialty in Etruscan archaeology. Dr. Neri works at the Ministry of Culture and coordinates with the Carabinieri during on-going investigations involving looted Italian antiquities.

40. **Dr. Aktham Oweidi (Jordan)**, Director of Excavations and Surveys within Jordan's Department of Antiquities. Since 1994, Dr. Oweidi has worked within Jordan's Department of Antiquities and conducted extensive research on Jordanian archaeological sites. In his current role at the Department of Antiquities, Dr. Oweidi has examined numerous real (and forged) Jordanian export permits.

41. **Georgi Ovcharov (Bulgaria)**, First Secretary, Police Liaison and Representative of Bulgaria's Ministry of the Interior to the United States, Canada, and Mexico. Mr. Ovcharov is an expert in drug trafficking, transnational criminal networks, and international security issues. Since 2002, Mr. Ovcharov has held various positions within the Organized Crime Directorate, where he serves as the liaison between Bulgarian police and foreign law-enforcement.

42. **Burcu Özdemir (Turkey)**, Chief of the Unit for Combating the Illicit Trafficking of Cultural Property within the Ministry of Culture and Tourism of the Republic of Turkey.

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Ms. Özdemir is an expert in cultural heritage and tourism, having held key roles in UNESCO's World Heritage Center since 2014. As the Chief of the Unit for Combatting the Illicit Trafficking of Cultural Property, Ms. Özdemir leads Turkey's efforts to combat the illicit trafficking of antiquities.

43. Maurizio Pellegrini (Italy), Former Director of the Department of Archeology within Italy's Ministry of Culture. From 1975 to 1980, Pellegrini worked as a photojournalist, and was the sole Italian photojournalist present during the 1979 Iranian revolution. Pellegrini later assisted the Cultural Property Circulation Office of the Southern Etruria Superintendence, serving as a consultant on the illicit market for antiquities for the Rome Prosecutor Office.

44. Dr. Federica Pitzalis (Italy), Archeologist with Italy's Ministry of Culture. She holds a Ph.D. in Archaeology from the Sapienza University of Rome with a focus on Etruscan antiquities. Dr. Pitzalis works at the Ministry of Culture and coordinates with the Carabinieri during on-going investigations involving looted Italian antiquities.

45. Nicole Pogantke (Germany), Art and Cultural Property Crime of the Federal Criminal Police Office in Germany. Ms. Pogantke investigates stolen cultural property in Germany, to include conducting law-enforcement activity involving targets of this Office.

46. Dr. Stefano Pracchia (Italy), Archeologist with the Italian Ministry of Culture. Dr. Pracchia has conducted fieldwork around the globe, including at Mehgarh sites in Pakistan, as an affiliate of the Italian Institute for the Middle and Far East (IsMEO). Dr. Pracchia works at the Ministry of Culture and coordinates with the Carabinieri during on-going investigations involving looted Italian antiquities.

47. Angelo Ragusa (Italy), Highly decorated Warrant Officer ("WO") of the Rome

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Office of the Archaeological Section of the Carabinieri Tutela Patrimonio Culturale. Since 1991, WO Ragusa has participated in many raids resulting in the recovery of thousands of Italian antiquities. WO Ragusa has also participated in several joint-investigations with this Office, including working with Colonel Bogdanos during the Iraq Museum investigation.

48. **James Ratcliffe (United Kingdom)**, General Counsel and Director of Recoveries at the Art Loss Register (ALR). Mr. Ratcliffe holds an M.Sc. in archaeology from the University of Oxford as well as a Graduate Diploma in Law. In his role at the ALR, Mr. Ratcliffe leads the ALR's efforts document and recover stolen and looted art and antiquities.

49. **Dr. Daniela Rizzo (Italy)**, Former Director of the Ufficio Sequestri e Scavi Clandestini (Seizures and Clandestine Excavations Office) within Italy's Ministry of Culture. As an expert in numerous Italian criminal proceedings into Italian antiquities traffickers, Dr. Rizzo provided her expert opinion on the thousands of Italian archaeological objects recovered during the investigations into Giacomo Medici, Robert Hecht, Gianfranco Becchina, Fritz Burki, Marion True, and Edoardo Almagià.

50. **Dr. Brian Rose (Syria and Turkey)**, Professor of Archaeology at the University of Pennsylvania and Curator-in-Charge (Mediterranean Section) at the University of Pennsylvania Museum of Archaeology and Anthropology. Dr. Rose holds a Ph.D. in art history and archaeology from Columbia University. Dr. Rose currently directs the archeological excavations at the ancient sites of Troy and Gordion in present-day Turkey, and has written extensively on Roman art and archeology in the Mediterranean and the Middle East (editing over 19 volumes on the results of the Troy excavations). For more than a decade, Dr. Rose provided pre-deployment training for U.S. armed-forces personnel bound for Iraq and Afghanistan to

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emphasize cultural heritage awareness and protection.

51. **Dr. Houmam Saad (Syria)**, Project Manager for the Directorate General of Antiquities and Museums within Syria's Ministry of Culture. Dr. Saad is an expert in Syrian and Near Eastern archeology with a focus on Palmyra. In his role at the Ministry of Culture, Dr. Saad leads the Anti-Smuggling Bureau and tracks looted pieces in cooperation with law-enforcement domestically and abroad.

52. **Dr. Isber Sabrine (Syria)**, Chair and co-founder of Heritage for Peace. Dr. Sabrine holds a Ph.D. in cultural heritage management from the University of Girona. Dr. Sabrine is an expert in heritage management, with expertise in the management of Syrian and Iraqi cultural heritage during periods of conflict. In his role at Heritage for Peace, Dr. Sabrine oversees capacity-building, training, and awareness-raising efforts to protect cultural heritage.

53. **Laure Salloum (Lebanon)**, Senior Archaeologist with the Directorate General of Antiquities within Lebanon's Ministry of Culture. Ms. Salloum works at the Ministry of Culture and has particular expertise on the Northern Bekaa Valley.

54. **Dr. Emiline Smith (Hong Kong)**, Lecturer in Criminology, University of Glasgow. Dr. Smith holds a Ph.D. in criminology from the University of Glasgow and an M.A. in public archaeology from University College London. An expert in the illicit trafficking of cultural property, Dr. Smith has conducted extensive field research in Hong Kong, China, Indonesia, Maldives, Myanmar, Nepal and Singapore and has particular expertise on the use of free ports in facilitating the illicit trade.

55. **Dr. Rolf Stucky (Lebanon)**, Former Head of the Department of Classical Archaeology at the University of Basel in Switzerland. Dr. Stucky holds a Ph.D. from the

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University of Bern and has conducted numerous excavations in Syria and Lebanon. A member of the Swiss Academy of Sciences and the Humanities, Dr. Stucky is an expert in archaeology of the Middle East and North Africa (MENA) region.

56. **Ray Swann (United Kingdom)**, Detective Constable in the Art and Antiquities Squad of the London Metropolitan Police, formally New Scotland Yard. Detective Constable Swann investigates stolen cultural property in the United Kingdom, to include conducting law-enforcement activity involving targets of this Office.

57. **Dr. Christos Tsirogiannis (Greece, Italy)**, Associate Professor at the Aarhus Institute of Advanced Studies. Dr. Tsirogiannis holds a Ph.D. in archaeology from the University of Cambridge. Dr. Tsirogiannis has assisted Greek law-enforcement with its investigation of Becchina, Medici, and Symes and participated in the raid of the Symes villa at Schinoussa. Dr. Tsirogiannis works with law-enforcement globally to identify looted antiquities.

58. **Dr. Elena Vlachogianni (Greece)**, Head of the Department of Documentation and Protection of Cultural Goods within the Hellenic Ministry of Culture and Sports. Dr. Vlachogianni holds a Ph.D. in classical archaeology from the University of Athens. Dr. Vlachogianni is an expert of Greek statues, epigraphy, and pottery. In her role at the Ministry of Culture and Sports, she works with Greek law-enforcement authorities to identify, track, and combat the smuggling of Greek antiquities.

59. **Ahmed Utaifa (Iraq)**, Officer in Charge of Cultural Affairs within the Embassy of the Republic of Iraq. In this role, Mr. Utaifa is familiar with Iraq's cultural heritage laws and procedures for investigating and repatriating stolen Iraqi antiquities. Mr. Utaifa holds a BA in English Literature from the College of Arts of Baghdad University and worked for over a

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decade in the areas of cultural affairs, diplomatic services, and language training for the Iraqi Ministry of Foreign Affairs.

60. Dr. Donna Yates (England), Associate Professor of Criminology and Criminal Law at the University of Maastricht. Dr. Yates holds a Ph.D. in archaeology from the University of Cambridge. Dr. Yates lectures internationally and publishes widely on the illicit antiquities trade, criminology, and the protection of cultural heritage globally.

61. Dr. Maria Yordanova (Bulgaria), Senior Fellow at the Law Program of the Center for the Study of Democracy, a European public policy institute based in Sofia, Bulgaria. She holds a Ph.D. in Law from Sofia University St. Kliment Ohridski. Dr. Yordanova is an expert in analyzing and drafting legislation and has coordinated a number of European projects regarding human rights and international security.

62. Hind Younes (Lebanon). Archaeologist with the Directorate General of Antiquities within Lebanon's Ministry of Culture. Ms. Younes works at the Ministry of Culture and coordinates with the law-enforcement authorities during on-going investigations involving looted Lebanese antiquities.

63. Dr. Candemir Zoroglu (Turkey), Former Specialist with the Department of Combating Illicit Trafficking within Turkey's Ministry of Culture and Tourism. Dr. Zoroglu holds a Ph.D. from Ankara University and is an expert in the illicit trafficking of cultural heritage. In his role at the Ministry, Dr. Zoroglu supported efforts to combat illicit trafficking with workshops, research, and other awareness initiatives.

List of Exhibits

<u>Exhibit #</u>	<u>Photograph</u>
1	Bull's Head
2	Calf Bearer
3A	Sardinian Idol (Medici Archive)
3B	Sardinian Idol
4A	Togate Figure (Medici Archive)
4B	Togate Figure
5	Eos Carrying Cephalus
6A	Bronze Pegasus (2) (Medici Archive)
6B	Bronze Pegasus (2)
7A	Villanova Helmet (Medici Archive)
7B	Villanova Helmet
8A	Terracotta Panels (2) (Medici Archive)
8B	Terracotta Panels (2)
9A	Sphinx Kylix (Medici Archive)
9B	Sphinx Kylix
10A	Berlin Painter Oinochoe (Medici Archive)
10B	Berlin Painter Oinochoe
11A	Leagros Hydria (Medici Archive)
11B	Leagros Hydria
12A	Antimenes Hydria (Medici Archive)
12B	Antimenes Hydria
13A	Attic African Head Aryballos (Medici Archive)
13B	Attic African Head Aryballos
14A	Proto-Corinthian Duck (Medici Archive)
14B	Proto-Corinthian Duck
15A	Proto-Corinthian Owl (Medici Archive)
15B	Proto-Corinthian Owl
16A	Ionian Ram's Head (Medici Archive)
16B	Ionian Ram's Head
17A	Corinthian Bull's Head (Medici Archive)
17B	Corinthian Bull's Head
18A	Corinthian Lion Vessel (Medici Archive)
18B	Corinthian Lion Vessel
19A	Faliscan Askos (Medici Archive)
19B	Faliscan Askos
20A	Marble Oscilla (4) (Medici Archive)
20B	Marble Oscilla (4)
21A	Spouted Bowl (Medici Archive)
21B	Spouted Bowl
22A	Apulian African Head Flask (Becchina Archive)
22B	Apulian African Head Flask

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Exhibit #	Photograph
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23B	Italo-Corinthian Duck Vessel
24A	Bronze Gorgons (3) (Becchina Archive)
24B	Bronze Gorgons (3)
25A	Etruscan White-Ground Aryballos (Becchina Archive)
25B	Etruscan White-Ground Aryballos
26A	Geometric Oinochoe (Becchina Archive)
26B	Geometric Oinochoe
27A	Figulina Plate (Becchina Archive)
27B	Figulina Plate
28A	Attic Black-Figure Eye Kylix (Becchina Archive)
28B	Attic Black-Figure Eye Kylix
29A	Bronze Handles (2) (Becchina Archive)
29B	Bronze Handles (2)
30A	Etruscan Panels (2) (Almagià Archive)
30B	Etruscan Panels (2)
31A	Polychromed Terracotta Antefix (Almagià Archive)
31B	Polychromed Terracotta Antefix
32A	Corinthian Aryballos In The Form Of A Helmeted Head (Almagià Archive)
32B	Corinthian Aryballos In The Form Of A Helmeted Head
33A	Attic Black-Figure Amphora (Almagià Archive)
33B	Attic Black-Figure Amphora
34A	Archaic Faience Aryballoi (2) (Almagià Archive)
34B	Archaic Faience Aryballoi (2)
35	Faience Baboon
36A	Attic Black-Figure Plemochoe (Symes Archive)
36B	Attic Black-Figure Plemochoe
37A	Bronze Oinochoe (Symes Archive)
37B	Bronze Oinochoe
38A	White-Ground Lekythos (Symes Archive)
38B	White-Ground Lekythos
39A	Ivory Plaque (Symes Archive)
39B	Ivory Plaque
40A	Situla (Symes Archive)
40B	Situla
41A	Warrior and Rider Figures (2) (Symes Archive)
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42	Antelope Standard and Bird Rattles (3)
43A	Kouros (Dirty or Unrestored)
43B	Kouros (Hecht Archive)
43C	Kouros

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Exhibit #	Photograph
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44B	Griffin Cauldron with Stand
45A	Gold Broach (Dirty or Unrestored)
45B	Gold Broach
46A	Minoan Hoard (33) (Dirty or Unrestored)
46B	Minoan Hoard (33)
47A	Female Figurine with Seven Gold Dress Ornaments (8) (Dirty or Unrestored)
47B	Female Figurine with Seven Gold Dress Ornaments (8)
48	Nude Female Statuette
49	Stag's Head Rhyton
50A	Syro-Hittite Idols (3) (Dirty or Unrestored)
50B	Syro-Hittite Idols (3) (Dirty or Unrestored)
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50D	Syro-Hittite Idols (3)
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51B	Orpheus Mosaic
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53A	Larnax (Dirty or Unrestored)
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54	Idol
55	Plate
56	Kandila
57	Cycladic Cup
58	Cycladic Plate
59	Bronze Griffin Protome
60	Small Anatolian Limestone Idol
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61B	Carved Ivory Head (Larger)
62A	Carved Ivory Head (Smaller) (Dirty or Unrestored)
62B	Carved Ivory Head (Smaller)
63	Red Carnelian Sun Fish Amulet
64	Cosmetic Spoon
65	Pin with Hand Holding Olive Wreath
66	Sword
67	Ivory Set (16)
68A	Death Masks (3) (Dirty or Unrestored)
68B	Death Masks (3)
69A	Stone Skull (Dirty or Unrestored)
69B	Stone Skull
70A	Incense Burner with Ducks, Goats, and Gazelle (Dirty or Unrestored)
70B	Incense Burner with Ducks, Goats, and Gazelle

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<u>Exhibit #</u>	<u>Photograph</u>
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72	Heliodorus Stele
73	Vase from the Pan-Athenian Games
74A	Gold Masks (2) (Dirty or Unrestored)
74B	Gold Masks (2)
75	Neolithic Masks (5)
76	Neolithic Bulls (4)
77	Neolithic Female
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78B	Teracotta Temples (3)
79	Chalcolithic Altar
80A	Tel El-Yahudiyeh Beer Strainer (Dirty or Unrestored)
80B	Tel El-Yahudiyeh Beer Strainer
81	Tombstones from Zoar (2)
82	Astarte
83A	Bronze Pitcher with Snake Shaped Handle (Dirty or Unrestored)
83B	Bronze Pitcher with Snake Shaped Handle
84	Statue of a Winged Human
85A	Ivory Carving (Dirty or Unrestored)
85B	Ivory Carving
86	Egyptian Hoard (5)
87	Ercolano Fresco
88	Glass Oinochoe
89A	Statue of a Woman (Dirty or Unrestored)
89B	Statue of a Woman
90	Veiled Head of a Female
91	Gold Bowl
92	Helmet

**SUPREME COURT OF THE CITY OF NEW YORK
COUNTY OF NEW YORK**

**IN THE MATTER OF A GRAND JURY INVESTIGATION INTO A
PRIVATE NEW YORK ANTIQUITIES COLLECTOR**

Statement of Facts

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