

ART AND HERITAGE LAW REPORT

THE ANTIQUITIES COALITION: CULTURAL HERITAGE PROTECTOR OR GLOBAL SOFT POWER AGENT?



By Kate Fitz Gibbon

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CCP encourages policies that preserve artifacts and archaeological sites; provide funding for site protection; offer safe harbor in international museums for at-risk objects; support uncensored academic research; and develop regulatory structures that foster the lawful collection, exhibition, and global circulation of art.

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Map of Ancient Rome illustrating Major Monuments and the Seven Hills, Jan Doree (Dutch), before 1704, Gift of Helen and János Scholz, 1958, Metropolitan Museum of Art, New York.

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EXECUTIVE SUMMARY

The Antiquities Coalition is one of the most influential actors in U.S. and international cultural-property policy. The organization functions not merely as a heritage-protection nonprofit, but as a sophisticated advocacy and soft-power network that has used elite political access, strategic communications, government funding, and partnerships with foreign states to transform public and official perceptions of the antiquities trade.

This study contends that the Antiquities Coalition's influence has depended heavily on framing antiquities trafficking as a major source of terrorist financing, organized crime, and money laundering. This narrative helped convert a specialized cultural-policy issue into a national-security priority and supported increasingly restrictive approaches to collecting, importing, exhibiting, and trading ancient art. However, its widely repeated multibillion-dollar estimates and claims of extensive terrorist financing are not supported by reliable data. Independent research by The RAND Corporation, the MANTIS project, and for the European Commission and Dutch National Police instead indicate that the illicit antiquities market is far smaller than portrayed and claims of terrorist financing are unsubstantiated - while a study by the U.S. Treasury has discounted the antiquities trade's connections to money laundering.

This study also identifies structural concerns surrounding the Antiquities Coalition's activities. These include overlapping personnel connecting its nonprofit advocacy to private strategic-consulting and financial interests; close relationships with prosecutors, policymakers, and the State Department's Cultural Heritage Center; and partnerships with authoritarian or illiberal governments whose own records of heritage destruction, minority repression, corruption, and inadequate site protection receive limited scrutiny. The Antiquities Coalition's links to these power players remain opaque - while it demands full transparency from the art market and museums. Although such relationships do not establish misconduct, they raise significant questions about conflicts of interest, institutional incentives, disclosure, and the use of cultural heritage as an instrument of diplomacy and reputational influence.

Federal grants have funded projects intended to develop, facilitate, or support foreign requests for U.S. import restrictions, positioning the Antiquities Coalition as both an advocate for and a paid implementer of a questionable U.S. policy - a departure from the targeted, evidence-based measures originally contemplated by Congress.

There are now virtually permanent cultural property agreements with thirty-six countries and more pending. Import restrictions encompass virtually all ancient objects, and agreements have become effectively permanent. The resulting costs extend far beyond the commercial art market.

Museums face mounting repatriation demands and provenance standards that may be impossible to satisfy for objects circulating long before modern documentation requirements. Scholars and educational institutions face diminished access to study collections, while collectors, diaspora communities, and the museum-going public confront emptied displays—and the loss of the histories those objects preserve. Yet these sweeping restrictions, imposed at the expense of U.S. citizens' rights, have failed to improve heritage protection abroad.

This study does not dispute the reality or harm of archaeological looting or reject the need for reform. Its central conclusion is that effective heritage policy must be grounded in verifiable evidence, statutory adherence, and practical action rather than emotionally compelling but weakly supported crisis narratives. The ultimate objective should be a proportionate system that prevents new looting without sacrificing lawful cultural exchange, scholarship, or public access to the shared material record of human civilization.

INTRODUCTION: THE ANTIQUITIES COALITION AND CULTURAL PROPERTY POLICY

In April 2014, in an address to senior U.S. officials, policymakers, and security specialists at Washington's Middle East Institute, Deborah Lehr of the Antiquities Coalition framed her organization's message succinctly: "We have beautiful heroines, we have bad guys, we have supporters, we have the terrorists."¹

This was the narrative template for the newly formed organization's decade-long campaign to persuade legislators, government agencies, the press, and the public that trading, collecting, and exhibiting ancient art were inherently controversial, even suspect acts.

The campaign has succeeded to an astonishing degree in recasting the ancient art trade as not only tainted by criminality but deeply immoral. This is a remarkable change from how the public has traditionally viewed a market populated by bookish dealers and passionate, historically minded collectors; a world in which the majority of antiquities galleries are small, essentially family businesses.

From its inception in 2014,² the Antiquities Coalition has positioned itself as an authority on the antiquities trade in a cultural heritage field that includes national governments and NGOs, archaeologists and museum curators, art dealers and collectors, as well as advocates for repatriation.

The Antiquities Coalition is more than a cultural NGO. It is a highly effective advocacy operation that in little more than a decade has dramatically altered U.S. cultural property policymaking and the public's understanding of the antiquities trade. It has done so with considerable support from the U.S. State Department Bureau of Educational and Cultural Affairs (ECA) Cultural Heritage Center.

The Antiquities Coalition has leveraged its elite access to finance, governments, prosecutors, and the media, to elevate contested and often weakly supported foreign claims about antiquities trafficking into official policy.

The Antiquities Coalition's role as a driver of cultural policy in the United States is especially troubling because its nonprofit advocacy overlaps with private financial and strategic-consulting-for-profit businesses. At the same time, its partnerships with authoritarian foreign governments give those regimes cultural legitimacy and policy benefits without adequate scrutiny of their own failures to preserve and protect cultural heritage, especially that of ethnic and religious minority communities.

The Antiquities Coalition has also benefited from millions of dollars in U.S. government grants, including to develop cultural property agreements³ with foreign nations under the 1983 Convention on Cultural Property Implementation Act (CPIA),⁴ expanding U.S. cultural property import restrictions far beyond Congress's intended limits.

Most damaging to the U.S. public interest is how the Antiquities Coalition's repeated use of inflated market figures and terrorism, money-laundering, and organized-crime narratives has stigmatized museum collecting and the lawful trade in antiquities while producing little demonstrated benefit for actual heritage protection. In that way, the Antiquities Coalition's influence has imposed real cultural costs, from reduced public access to chilled scholarship. It has displaced attention from the harder and more important work of source-country documentation, law enforcement, and cultural property preservation.



US Capitol west side, photo Martin Falbisoner, 5 September 2013, CCA-SA 3.0 Unported license.



Mural "Defense of Human Freedoms," by Kindred McLeary in Harry S. Truman Federal Building, headquarters Department of State, photo Carol Highsmith, February 26, 2016, Library of Congress, [highsm 42355 //hdl.loc.gov/loc.pnp/highsm.42355](https://hdl.loc.gov/loc.pnp/highsm.42355), Public Domain

PART I. SOFT POWER

1. Non-profit Advocacy and Political Access

Under founder and chairman Deborah Lehr and executive director Tess Davis, the Antiquities Coalition presents itself as "leading the international campaign against cultural racketeering," characterizing the sale of ancient art as "trafficking," indelibly linked to organized crime, armed conflict, and terrorism.⁵ By its own account, the Antiquities Coalition is now a key player in the global effort to stop the looting and trafficking of antiquities.⁶ In fact, it is much more.

Publicly, the Coalition operates as a high-credibility platform that converts heritage advocacy into access-to officials, conferences, diplomatic events, and to reputational authority by association. In a more cynical reading, its core message—that illicit antiquities are a serious security problem and import restrictions plus tougher due diligence are the solution—is highly effective in attracting lawmakers and senior officials who know little about art but respond defensively to threats purportedly tied to terrorism.

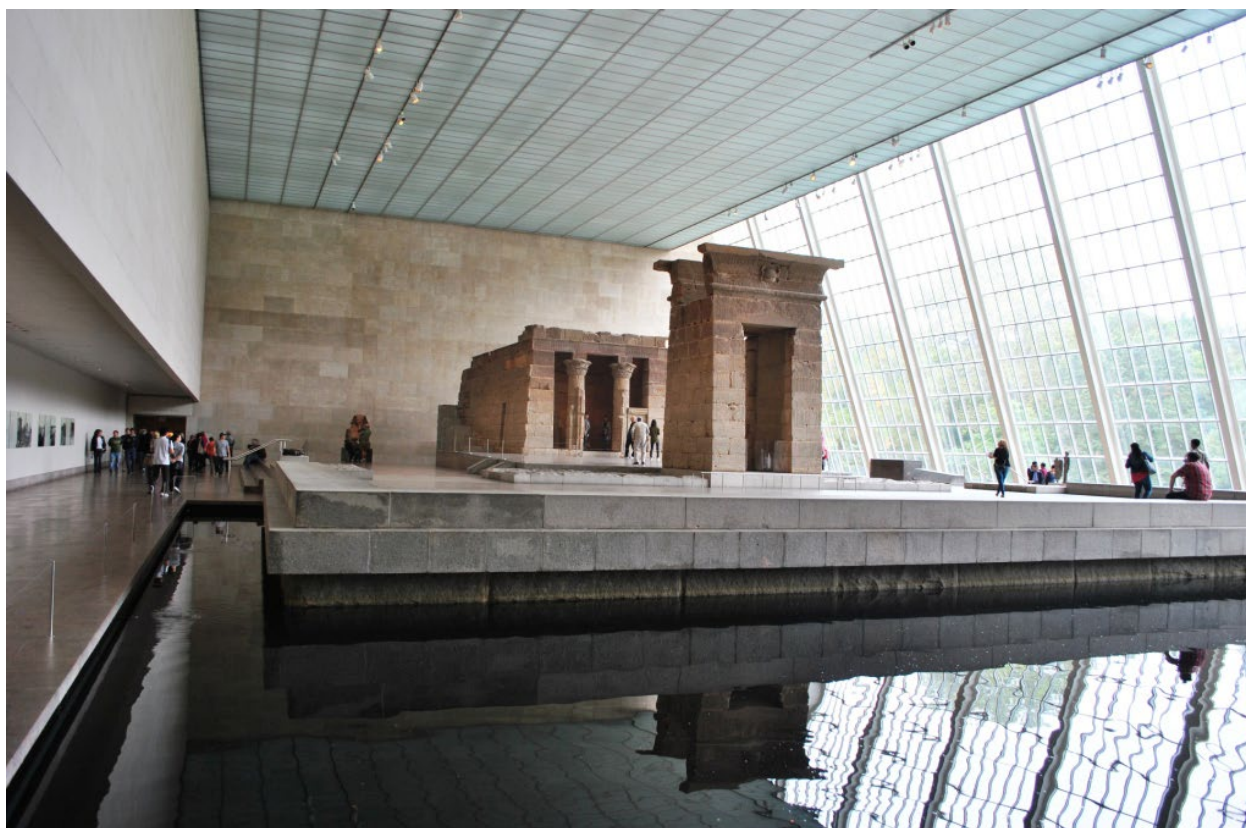
The organization made news at the same 2014 presentation at the Middle East Institute by announcing that collecting antiquities was a multi-billion-dollar art market. Antiquities Coalition founder Deborah Lehr threw out several estimations of profits from "cultural racketeering" and antiquities looting:

- A "very conservative estimate" of \$3 billion in Egypt since the revolution in 2011.
- Later, "With Egypt, it is probably \$3-10 billion, globally it has to be a much more significant number."
- "Coming out of Syria, it is \$2 billion."⁷

These numbers came as a surprise to the mostly micro-businesses of the antiquities trade, as numbers for the legal trade have been estimated by knowledgeable insiders at \$100-300 million USD.⁸ To make a fairly obvious comparison showing the absurdity of these numbers, Lehr's claims approximated the total annual revenue of the entire U.S. professional National Basketball Association during the same years.⁹ Antiquities are not nearly as popular as tickets or team jerseys and get no television rights.

By exaggerating the market's size, citing looting as a primary source for antiquities, and alleging that their sale was funding terrorism, the Antiquities Coalition re-cast a damaging but sporadic criminal activity on the edges of the art trade into a worldwide crisis with a one-stop solution—ending the global circulation of ancient art. The Antiquities Coalition has not stated that every commercial exchange of ancient art is wrongful; in fact, it has stated that it is not against the legitimate trade in antiquities but has yet to publicly identify any specific transaction as actually legal and acceptable.

Ancient art has circulated globally for centuries—even millennia—and artworks and artifacts have been acquired and exchanged in many ways. Antiquities have been transferred through permitted archaeological excavation, partage, lawful sale in foreign countries, unhindered or licensed export, and via scholarly collaboration as well as through



Temple of Dendur, Gift of Government of Egypt in 1965, dismantled during Aswan Dam construction, Metropolitan Museum of Art, New York, photo by Elisa.rolle, 5 October 2013, CCA-SA 4.0 International license.

harmful illegal looting. Blanket claims against the trade in antiquities are thus unwarranted.¹⁰ Yet ill-informed policy makers have not hesitated to take these claims seriously when they are voiced through the Antiquities Coalition's polished publicity campaigns.

2. Who leads the Antiquities Coalition?

The Antiquities Coalition's influence rests as much on the elite backgrounds and social access of its leadership as on archaeological or academic expertise-particularly in the case of its founder, Deborah Lehr.

Lehr is not an archaeologist, but a senior finance and policy executive who has spent decades operating at the highest levels of Wall Street and government. Lehr served in the White House as Director for Asian Affairs at the National Security Council and as Deputy Assistant U.S. Trade Representative for China in the 1990s, where she was a lead negotiator for China's entry to the World Trade Organization. She was a managing director at the New York Stock Exchange and a senior advisor to CEOs at Merrill Lynch and Goldman Sachs, including Henry Paulson.¹¹ She also assisted Paulson in launching the U.S.-China Strategic Economic Dialogue in the mid-2000s.¹² Today, she remains embedded in global finance and policy networks as Vice Chair and Executive Director of the Paulson Institute¹³ and Managing Partner and CEO of Edelman Global Advisory.¹⁴ Lehr is interim CEO and was recently elected Chairman of the Board of Meridian International Center.¹⁵ She also sits on the board of the Middle East Institute and is a member of the Council on Foreign Relations.

These relationships link to other relevant affiliations. Lehr is the Chair and CEO of Basilinna,^{16,17} a consulting firm focused on China and the Middle East, whose clients have included Goldman Sachs, JPMorgan, Boeing, Pfizer, and others.¹⁸ Basilinna was acquired in 2021 by the public relations firm Edelman.¹⁹

This background in corporate advisory work and high-level government engagement has been instrumental in building the Antiquities Coalition's board and donor base. A comparison of the leadership and advisors of the Antiquities Coalition (a non-profit) and Basilinna (for profit) shows notable overlap, including foreign diplomats and former advisors to foreign governments.²⁰



Lamassu, the Gate of Nimrud, 8th century BCE. Metropolitan Museum, NY, photo by Rosmanios, 30 December 2005, Creative Commons Attribution 2.0 Generic license. Acquired in 1932 as a gift from John D. Rockefeller Jr.

Basilinna also appears to take credit for a project undertaken by the Antiquities Coalition,²¹ a separate non-profit entity. A Basilinna webpage states: “We built a coalition of partners to support a non-profit’s efforts to bring about a “Ministerial-level convening in Egypt, involving Antiquities Ministers, foreign ministries, and UNESCO,” that resulted in the Cairo Declaration, “promoting regional cooperation to combat... illegal trade.”²²

3. A Network of Insider Influence

Questions arise from the Antiquities Coalition’s listing of prominent figures in advisory roles at Basilinna and the Antiquities Coalition, such as former Egyptian Ambassador Yasser Elnaggar²³ and archaeologist Zahi Hawass, advisors at both Basilinna and the Antiquities Coalition²⁴ and former UNESCO chief Irina Bokova at Basilinna.²⁵ Tess Davis is an Executive Director at both The Antiquities Coalition and Basilinna; Eric Cline serves on the Advisory Council of the Antiquities Coalition and as a Senior Fellow at Basilinna.²⁶ Placing nonprofit advocacy alongside strategic advisory work may be useful in forging connections between Basilinna and foreign governments, particularly when Antiquities Coalition policy “wins” involve government-to-government agreements and when it emphasizes its role in related diplomatic engagements.

The Antiquities Coalition’s executive director, Tess Davis, operates in similarly influential circles. Trained as both a lawyer and an archaeologist, Davis has worked with the Global Initiative Against Transnational Organized Crime and consulted for UNESCO; her efforts on Khmer artifact repatriation have drawn attention in academic and media contexts.²⁷

Together, Lehr and Davis’s policy backgrounds give the Antiquities Coalition a form of authority that extends beyond ‘cultural heritage.’ Its leadership speaks more fluently in the language of national security and finance than of culture—an orientation that resonates with powerful institutions in the United States and internationally.

Socially, the Antiquities Coalition occupies a cross-partisan sphere of influence. In 2017, Deborah Lehr received the Hadrian Award at the World Monuments Fund’s Hadrian Gala in New York City.²⁸ Ms. Lehr and her husband, John F.W. Rogers, a senior Goldman Sachs executive, move within the same high-level circles across administrations, attending White House dinners and hosting receptions and forums for world leaders.²⁹



Grand Egyptian Museum opening with diplomatic invitees, photo Republica de Colombia, 1 November 2025, public domain dedication. The GEM took more than 20 years and \$1 to \$1.2 billion to construct. The primary source of financing was the Japan International Cooperation Agency (JICA) and the Japan Bank for International Cooperation (JBIC), through two Official Development Assistance (ODA) soft loans.

When the same figure leads both a non-profit policy platform and a for-profit advisory business operating in the same regions, the non-profit's visibility can generate spillover benefits: relationships, introductions, status, and the ability to convene influential actors. This is a question of optics and incentives, not evidence of wrongdoing, but it raises persistent concerns.

Similar links between the nonprofit and for profit organizations are found in communications networks. The Antiquities Coalition's Board of Directors, senior team and advisors include experienced strategic communications professionals, a former White House press secretary, senior trade and diplomatic policy advisers, and former chiefs of staff to the highest level administration and cabinet officials, a veritable "influence infrastructure."³⁰

Its programming features frequent participation in international conferences, policy forums, and collaborative initiatives. Internationally, the Antiquities Coalition has become a key addition to meetings like the G20 along with representatives of powerhouses such as UNESCO, ICOMOS, the World Customs Organization, and Interpol, as well as participating in and even sponsoring events tying cultural heritage to general governance and development, especially in MENA and Gulf nations.³¹ This repeated outreach positions the Antiquities Coalition as a connector among governments, policymakers, and heritage institutions.

None of this challenges the Antiquities Coalition's right to advocate. However, the implied conflicts of interest are troubling. The Antiquities Coalition is a sophisticated, well-resourced non-profit which has significantly reshaped heritage policy and is supported by large U.S. government grants—yet it is also connected to foreign governments and major U.S. business interests. At a minimum, publicly addressing potential conflicts and enhanced disclosure is warranted when the same leadership, geographies, and networks span non-profit advocacy, state partnerships, and for-profit advisory roles.



Greek Temple of Segesta, Sicily, 6th century BCE, photo Rabe!, 29 March 2015, CCA-SA 4.0 International license. Today, Segesta is home to an archaeological park with two acropolis outside the city walls.

4. Strategic Alignment with the Financial Elite

Questions also arise from the close, overlapping relationships between the Antiquities Coalition and Goldman Sachs. A central link is Deborah Lehr's husband, John F. W. Rogers, a senior Goldman Sachs executive and a highly influential former State Department official.³² Goldman Sachs has long integrated senior figures from government into its leadership. For example, four years prior to the founding of the Antiquities Coalition, Rogers recruited Dina Powell directly from the State Department to the firm as a managing director in 2007.³³

Powell is unquestionably an able administrator. Immediately prior to joining Goldman Sachs, Powell served as Assistant Secretary of State for Educational and Cultural Affairs (2005-2007), functioning as an 'ambassador' to the Arabic-speaking world.³⁴ In that position, she also exercised delegated presidential authority over cultural property agreements.

Notably, in her role as the President's decision-maker in 2007, Powell approved the first Memorandum of Understanding (MOU) that included ancient coins, with Cyprus, against the actual recommendation of the Cultural Property Advisory Committee.^{35,36} At the time of that decision, she had already accepted a position at Goldman Sachs,³⁷ where she served sixteen years in leadership positions.³⁸

Powell is not named in any governance, staff advisory or program capacity in public Antiquities Coalition or Basilinna records. However, there is an appearance of a sustained personal-professional relationship between Powell and Lehr.³⁹ Dina Powell (now Dina Powell McCormick) married Dave McCormick in 2019.⁴⁰ Dave McCormick, now a U.S. senator from Pennsylvania, was among the co-sponsors of the Art Market Integrity Act, S. 2400, discussed later in this paper.⁴¹

Goldman Sachs' interest in the Antiquities Coalition's cultural heritage initiatives carries strategic implications. By backing these programs, the firm can strengthen relationships with governments in key regions, including China, Cyprus, Greece, Egypt, and the Gulf states. This goodwill may indirectly support Goldman Sachs's banking and advisory operations in those markets and reinforce ties between Goldman Sachs Gives (GS Gives), its philanthropic arm, and officials involved in Egyptian investment and foreign trade.^{42,43}

Such engagement also serves reputational goals. Support for cultural preservation allows Goldman Sachs to present itself as a responsible global actor in the wake of criticism following the 2008 financial crisis. Philanthropy in this domain functions as a form of soft power, generating positive public policy sentiment rather than relying on direct influence. Association with the Antiquities Coalition aligns the firm with a high-visibility cause-protecting heritage from trafficking and terrorism-that resonates with both policymakers and the public.

PART II. POWER PARTNERSHIPS: GOVERNMENTS AND INTERNATIONAL INFLUENCE

“This is not only about not teaching the Tibetan language. ... It is carefully done to manage the way children think and believe.... The result is that when the children come out of kindergarten at age 6, even if both parents are Tibetan, the children think that they are Chinese.... In a decade or two, maybe the culture will die, and be only in a museum.”

Human Rights Watch interview with unnamed Tibetan official, 2025⁴⁴

“Education must penetrate the blood and reach into the soul.”

Chinese Communist Party General Secretary Xi Jinping, in a speech at the Central Nationalities Work Conference on September 28, 2014.⁴⁵

What many observers find alarming about the Antiquities Coalition’s messaging is that it gives political cover to leaders of repressive regimes, allowing them to burnish their international image while avoiding scrutiny of how their own cultural policies have damaged heritage and reshaped history for their own political ends. From the outset, the Antiquities Coalition has pursued collaborations with governments and institutions worldwide—including those under repressive regimes—to advance its campaigns.

Egypt

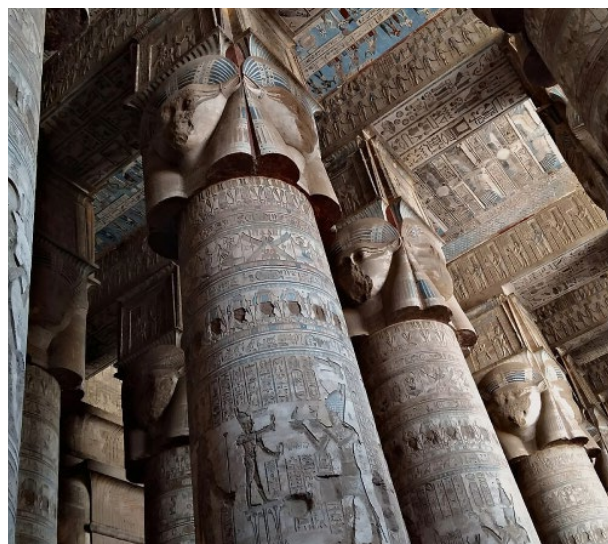
The Antiquities Coalition’s origins are closely intertwined with Egypt’s antiquities establishment. Its precursor initiative, the International Coalition to Protect Egyptian Antiquities (ICPEA),⁴⁶ was developed in partnership with Egypt’s Ministry of Antiquities during the turbulent period following the 2011 revolution.

As Egypt transitioned from revolutionary upheaval to the authoritarian rule of Abdel Fattah el-Sisi, the Antiquities Coalition consistently promoted narratives emphasizing looting, cultural destruction, and terrorist threats to heritage.⁴⁷ This framing aligned with broader priorities of the Egyptian government, which sought to present itself as a bulwark against instability and extremism while at the same time, it faced growing international criticism for political repression, mass arrests, and human-rights abuses.⁴⁸

The Antiquities Coalition organized a “Culture Under Threat” summit in Cairo in May 2015 with Egypt’s Ministry of Antiquities, and diplomats from Iraq, Jordan, Kuwait, Lebanon, Libya, Oman, Saudi Arabia, Sudan, and the United Arab Emirates and the participation of UNESCO.⁴⁹ The summit produced the “Cairo Declaration,” which announced that, “Priceless artifacts from the MENA region are being trafficked and sold at the hands of terror groups and criminal networks, which fund the crime and terrorism that has swept many nations in the region.”⁵⁰ It called for international support for public awareness campaigns linking antiquities trafficking to terrorism.⁵¹



Great Sphinx of Giza and the pyramid of Khafre, Egypt, Fourth Dynasty, c. 2600-2500 BCE. Hamish2k photo uploader, January 2005, CCA-SA 3.0 Unported license.



Dendera Temple of Hathor, 54 BCE, part of the extensive Dendera complex dating from the late Ptolemaic period up to the reign of Roman Emperor Trajan. Photo Bilal Detailz, 24 September 2025, CCA-SA 4.0 International license.



Saint Catherine's Monastery, Sinai, Egypt, photo Berthold Werner, 9 November 2010, CCA-SA 3.0 Unported license. World's oldest Christian Monastery, built in the 6th century CE and home to a famous ancient library. It is located where God appeared to Moses in the Burning Bush in the Abrahamic religions. Today, a huge development project backed by the Egyptian government, with malls, hotels, entertainment and holiday venues is under construction nearby. The monastery's land has also been claimed by the Egyptian government, a decision supported by Egyptian courts.

Critics argue that this emphasis not only reinforced misleading narratives favorable to the Egyptian and other Arab governments but downplayed those states' responsibility for heritage protection and serious failures in civil governance.⁵² Most recently in Egypt, the state's development plans around St. Catherine's Monastery in Sinai show how even living religious heritage can be subordinated to state-controlled tourism infrastructure and building hotels, commercial facilities, and large-scale desert development. In the case of St. Catherine's Monastery, a World Heritage site, the Government of Egypt has usurped control over monastery lands held for centuries.⁵³

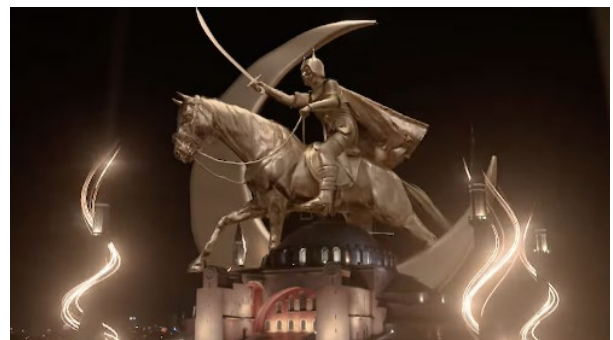
The Antiquities Coalition maintains close ties with Egypt's leadership under President el-Sisi. Longtime Egyptian antiquities official Zahi Hawass serves as Honorary Chairman of the Coalition's Advisory Council,⁵⁴ while Yasser Elnaggar, former Chief of Mission at Egypt's Embassy in Washington, also sits on the Advisory Council.⁵⁵ Hawass was most recently honored by the Meridian International Center and its recently elected Chair of the Board of Trustees, Deborah Lehr, at a presentation of its 2026 Cultural Diplomacy Award.⁵⁶

Turkey

Turkey's recent renewal of a cultural property agreement with the U.S. was supported by the Antiquities Coalition. Meanwhile, the Erdoğan government has converted World Heritage monuments from museums into mosques. It has seized Jewish, Orthodox, and Armenian Christian religious monuments and looked the other way as internet influencers encourage treasure hunters to dig into Armenian and Kurdish minority sites.⁵⁷ President Erdoğan's conversion of Hagia Sophia from a museum into a mosque transformed a World Heritage monument into an instrument of nationalist and religious politics, allowing him to present himself as the restorer of Ottoman-Islamic sovereignty.⁵⁸ Erdoğan's government celebrates the official reclassification of monuments of other religions such as the tenth century Armenian Cathedral at Ani (Surp Asdvadzadzin) ⁵⁹ as Islamic monuments in order to secure domestic political gains, while at the same time, claiming to protect Turkish heritage by demanding the return of ancient art from U.S. museums.⁶⁰



World Heritage site Chora Church, also known as Kariye Camii, mosaic of Life of Christ. The Chora Church's current building dates to the 11th century, it was rebuilt in the 14th and decorated with the finest known mosaics of the Palaeologian Renaissance, prefiguring the development of Mannerism in the West. It was converted to a mosque by the Turkish government in 2020. Photo Art Projection, 6 July 2012, CC0 1.0 Universal Public Domain Dedication.



Screenshot of Hagia Sophia son et lumière performance above Hagia Sophia celebrating 569th anniversary of Mehmet II's conquest of Constantinople, May 2022.



Hasankeyf/Batman panoramic, Turkey, Author Ben Bender, 27 October 2013 CCA-SA 3.0 Unported license. The region is largely populated by the Kurdish minority peoples who were displaced by the building of the Ilisu Dam. Hundreds of historic and archaeological sites, including a 12,000-year-old town, were flooded.

Saudi Arabia

The Antiquities Coalition has worked in partnership with the Kingdom of Saudi Arabia's Heritage Commission. In 2023, Tess Davis co-facilitated training in Riyadh with Saudi authorities on combating illicit antiquities trafficking.^{61,62} The Antiquities Coalition publicly thanked the Commission for hosting and signaled interest in further collaboration, indicating a sustained working relationship that spans U.S.-Saudi borders. This partnership is notable given Saudi Arabia's authoritarian system of governance and its role in the recent destruction of heritage in Yemen.⁶³

Cambodia

In Cambodia, Tess Davis has coordinated with U.S. authorities on artifact repatriation. The Coalition co-hosted a 2022 ASEAN conference with the Cambodian government on preventing illicit trade.⁶⁴

There are certainly legitimate concerns with past looting in Cambodia—but unfortunately, that discussion often fails to acknowledge either that the Khmer Rouge was actively destroying temples and statuary at the time, or the role of the Cambodian and Thai military in removing materials from the country for sale by Western dealers. Nor does the Antiquities Coalition voice concerns about Cambodian former leader Hun Sen (Prime Minister from 1985 until 2023, and before that, a Khmer Rouge officer⁶⁵) or the new Prime Minister, his son Hun Manet's blatant appropriation of Angkor Wat's historic glamour to support their family dynasty's claim to rule—or that the current Cambodian government is demolishing local villages surrounding Angkor Wat in order to render the World Heritage site a more profitable tourist destination.⁶⁶

The Antiquities Coalition's willingness to work with and lend legitimacy to such regimes illustrates its realpolitik approach to achieving its goals. However, the most disturbing consequences of tying nationalist political identity to the trade in



The 11th century Cathedral of Ani or Surp Asdvadzadzin Cathedral, a UNESCO World Heritage Site and masterpiece of Armenian medieval architecture in Kars in northeastern Turkey; it is currently being restored in a partnership between Turkey's Ministry of Culture and the World Monuments Fund. It is located 100 meters from the border of Armenia. In July 2025, Turkey's Anadolu Agency announced that on completed restoration, the site would serve as the "Fethiye (Conquest) Mosque," without acknowledging its Christian identity. Photo Bjørn Christian Tørrissen, 9 August 2009, CCA-SA 3.0 Unported license.



Some 5000 monks were brought by Hun Sen's Cambodian People's Party (CPP) to pray at Angkor Wat at Hun Sen's 'happiness' ceremony, 02 November 2017, screenshot Voice of America.



Prime Minister Hun Sen at Angkor Wat ceremony to pray for "political stability and happiness" shortly after dissolving Cambodia's main opposition party and arresting election opponents ahead of 2018 elections. Voice of America, 02 November 2017, Khan Sokummono/VOA Khmer.



The song Glory to Hong Kong was written by a local musician who said that “Hong Kong ought to have a song,” during the 2019 pro-democracy protests. People gathered to sing the song (along with Can You Hear the People Sing from Les Miserables) in the evening in streets and shopping centers, including this one in New Town Plaza, Hong Kong, on 11 September 2019, Photo Studio Incendio. CCA 2.0 Generic license. The song was banned; even playing the tune is illegal.

art can be seen in regimes eager to wrap themselves in ‘heritage’ while crushing living communities.

People’s Republic of China

China’s cultural policies today are focused on the deliberate cultural destruction of Tibetan and Muslim minorities, their language, religion and lifeways.⁶⁷ The Antiquities Coalition’s ties to China’s government are significant—and at odds with every principle of cultural heritage protection.

Nonetheless, Deborah Lehr, drawing on her background in U.S.-China relations, has repeatedly praised Chinese government heritage policies.⁶⁸ In August 2025, she commended President Xi Jinping for making cultural preservation “a hallmark of his governance.”⁶⁹ By contrast, there is no record of Lehr or the Antiquities Coalition publicly criticizing China’s well-documented destruction of Tibetan Buddhist, Uyghur Muslim and



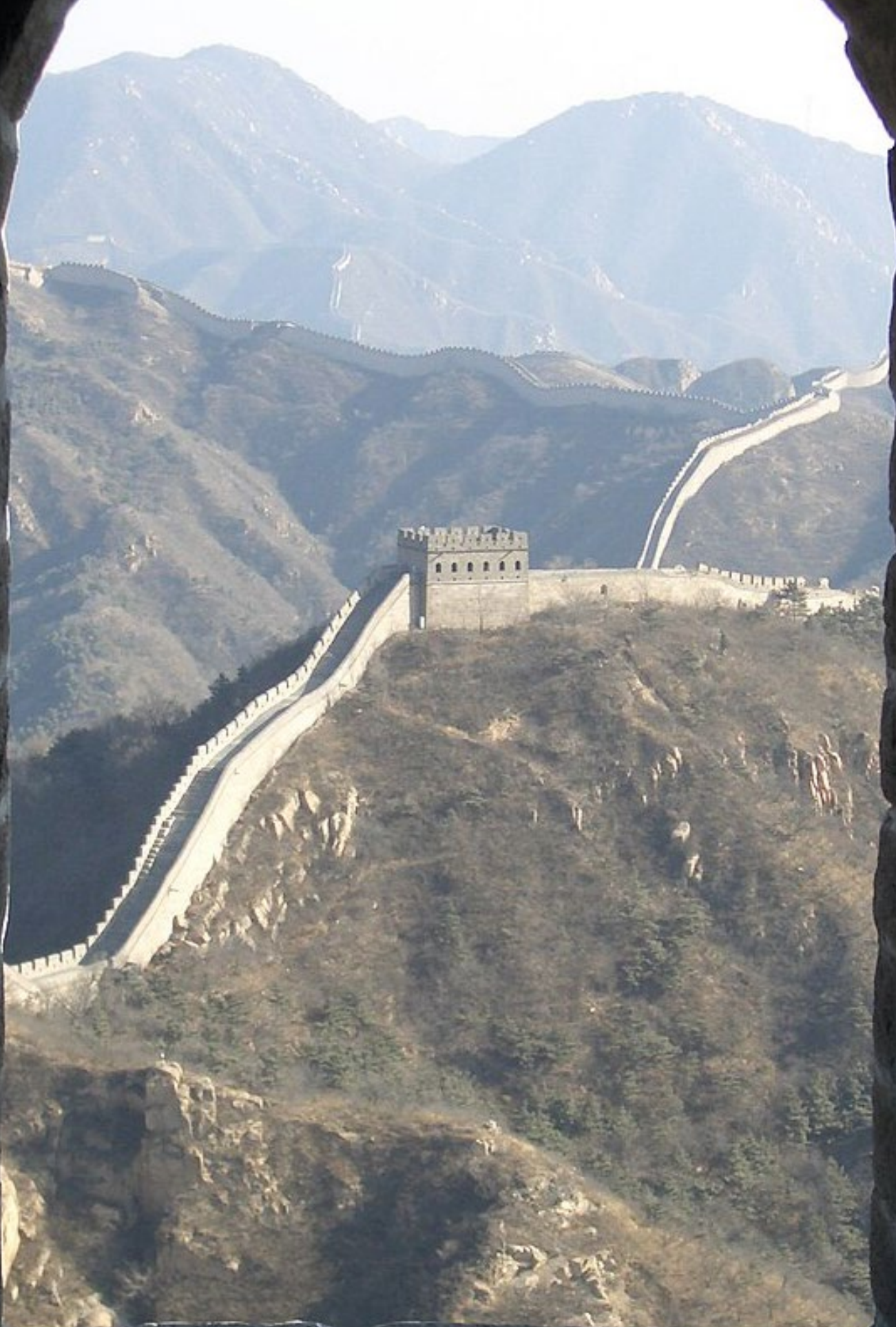
Chinese state propaganda photo of an “orphanage” for children confiscated from Uyghur concentration camp detainees, to deny them their culture and convert them into ‘Chinese.’ U.S. State Department estimates 900,000 Uyghur children have been placed in locked schools away from parents starting at kindergarten age. Children taken from detainees are termed ‘orphans’ and may be adopted by Chinese families.(Photo from Chinese social media 2020).



Uyghur detainees in brainwashing camps, where torture is common and native languages are forbidden. Photo from Chinese social media; taken down after circulating outside China.



Tibetan monks accused of anti-social activities. Monks and nuns must now adhere to Xi-Jinping Thought. Photo Students for a Free Tibet.



Great Wall of China, a series of discontinuous fortifications totalling 13,171 miles in length, built along ancient northern borders. Sections were built as early as the 7th century BCE, linked together under the Qin in 200s BCE, and significantly expanded under the Ming dynasty between 1450 and 1650. Photo by Diego Delso, [delso.photo](#), 19 February 2006, license CC BY-SA.

Such activities further the Antiquities Coalition's positive relationships with these and other authoritarian governments. For national leaders, cultural-property campaigns offer more than the public-relations benefit of appearing as defenders of the national patrimony. They provide access to a unifying heritage narrative of past greatness, one that can distract from repression, corruption, and visible administrative incapacity. Cultural heritage becomes a political resource: a way to wrap the state in antiquity, sanctify national identity, and divert attention from contemporary disorder.

World Heritage status intensifies these incentives. The UNESCO designation brings visibility to a nation's monuments and turns heritage into diplomatic capital. States compete for the prestige and tourist revenue that come with World Heritage Monument listings. They can also form unlikely coalitions within UNESCO to support one another's nominations and to defend existing designations when neglect, overdevelopment, or politicized management place them at risk.⁷⁶ In India, for example, Prime Minister Modi's government benefits from the fame of monuments such as the Taj Mahal, even as secular democracy is weakened in the rise of Hindu majoritarian politics, and the government is unable to protect the monument itself from pollution and environmental damage.⁷⁷

1000 ethnic minorities awaiting online booking
 1000少数民族名族，在线等待预约

共有楼主 收藏 回复 搜索

斜文字和蓝星
 初级粉丝

新疆政府组织出来新疆实习生1000人左右，政审，体检合格，年龄18至28周岁，由新疆政府委派正式在编干部管理，厂方有需求可申請如新疆在编管理24小时住「管理」合同期为一年的时候！新疆到你可自由，要有统一的员工宿舍，（方便管理），鉴定合同后人员15天内到企业！如有用工需求的企业提前联系！用新疆工的好处是：半军事化管理，能吃苦，人员不流失，合同签多久，就上班多久！100人起送！

The Xinjiang government has organised around 1,000 trainees from Xinjiang who have already passed political and medical examinations. They are between 16-18 years old and are managed by Xinjiang government-appointed cadres. Factories can apply for current Xinjiang police to be stationed 24-hours a day for in-factory management! Contracts signed for one year to start! Can supply own Xinjiang chef but a separate dormitory is required for the workers (for easy management). Workers will arrive at your enterprise within 15 days of signing the contract! Companies with labour needs please contact in advance! The advantages of using Xinjiang labour are: semi-military style management; can withstand hardship; no loss of personnel; will work for the length of the contract! Minimum order 100 workers!

王國通
 中国大陆

Source: '1,000 minorities, awaiting online booking' (1000少数民族, 在线等待预约),

Baidu HR Forum (百度 HR吧), 27 November 2019, [online](#). Translated from Chinese by ASPI.

17



Lightning over the Potala Palace in Lhasa, Tibet, Author: 李国强, 11 August 2011, license CC BY-SA.

PART III. THE STATE DEPARTMENT'S MOU PIPELINE

“... as I testified for the State Department, the United States has an important national interest and a moral obligation to work against the destruction of the cultural heritage of mankind. At the time, I expected the State Department to limit import controls to objects attracting serious threats to archeological resources and to insist on conditions preserving a reasonable flow of ancient art to the United States.”

Mark B. Feldman, chairman of the U.S. delegation, UNESCO drafting committee, and chief negotiator for the Department of State during Congress’ enactment of the Cultural Property Implementation Act.⁷⁸

Questions concerning the Antiquities Coalition’s role in cultural property policy also arise from the organization’s participation in grant-funded programs connected to the development, support, and expansion of cultural property agreements under the Cultural Property Implementation Act.

The State Department has directed millions of dollars to organizations, including the Antiquities Coalition, that both advocate for and effectively help administer cultural property agreements. While some funding has supported documentation, conservation, and heritage preservation activities, other grants have been tied directly to projects intended to facilitate new agreements or support existing restrictions.

A circular structure of grant-generated MOU requests—where U.S. taxpayer funds support both the creation of



Demonstration for the rights of the Uyghurs in Berlin. If protesters are identified, their entire families remaining in China may be arrested and children taken away. Simple communication with a foreign location by telephone or internet is cause for arrest and lengthy detention. Author Leonhard Lenz, 19 January 2020, CC0 1.0 Universal Public Domain Dedication.



Colosseum, also known as the Flavian Amphitheatre, Rome, completed CE 80, the largest ancient amphitheatre ever built, photo Sam Valadi, 10 September 2012, CCA 2.0 Generic license.

evidentiary justifications and the advocacy for restrictions-emerged alongside the marked expansion of MOUs since the State Department assumed control of the program in 2000. By 2019, the Department appears to have gone further, effectively outsourcing the development of “source country” requests to both the American Society of Overseas Research (ASOR) and the Antiquities Coalition.

The Antiquities Coalition’s focus on strategic relationships with global power centers helps explain where it has been most successful, in influencing U.S. government policy.

Much of the United States’ international cultural property policy is administered through the State Department’s Cultural Heritage Center, a small but influential office within the Bureau of Educational and Cultural Affairs (ECA). The Antiquities Coalition has cultivated a close relationship with this office, which supervises the negotiation and renewal of cultural property agreements that now restrict access by U.S. museums, businesses, collectors, and consumers to art and antiquities from thirty-six countries.

In the United States, the 1983 Cultural Property Implementation Act (CPIA) was meant to implement the 1970 UNESCO Convention,⁷⁹ but only within limits set by Congress. Import restrictions were permitted only after specific statutory findings, including that pillage threatens a nation’s cultural patrimony, that the requesting country is taking meaningful self-help measures, that U.S. restrictions would materially reduce looting, and that the measures are consistent with international cooperation and lawful cultural exchange.⁸⁰ Congress also limited the scope of covered “archaeological” and “ethnological” material.⁸¹ The CPIA statute does more than require a request; it also requires that the request be accompanied by a written statement setting out the facts known to the State Party that bear on the relevant statutory criteria.⁸²



Laocoön and his Sons, Pio Clementio Museum, Vatican Rome, by three Greek artists from the island of Rhodes: Agesander, Athenodorus, and Polydorus, about 50-20 BCE, photo Wilfredor, taken 10 February 2024. CC0 1.0 Universal Public Domain Dedication.



Afghanistan, Second Anglo-Afghan War dating to British occupation of Qandahar. AH 1296-1298 / AD 1878-1880. Æ Fulus Bears a British crown within wreath on the obverse, and an Arabic inscription in four lines on the reverse. CNG, July 2, 2018, CCA-SA 2.5 Generic license.



Afghanistan, Billon drachm of the Hephthalite King Napki Malka (c. 475-576). Obv: Napki Malka type bust with winged headdress. Rev: Zoroastrian fire altar with attendants either side. Sun wheel, or eight-spoked Buddhist Dharmacakra above left. Photo PHG, 2005, CCA-SA 3.0 Unported license.

Current State Department practice has moved far from that limited model. Agreements restricting trade and imports are routinely renewed every five years, often for decades, with little visible attention to the statutory requirements. Designated Lists have expanded from targeted categories of at-risk antiquities to sweeping controls covering 10,000 to a million years or more of every conceivable ancient object and broad classes of ecclesiastical art, folk art, costume, household goods, and trade or tourist material.

The Cultural Property Advisory Committee (CPAC) is an 11-member presidential panel that advises the State Department on foreign requests for U.S. import restrictions on cultural property. Congress required balanced representation from museums, archaeologists, the international art trade, and the public. Critics argue that, since CPAC moved to the State Department, active trade members have rarely filled the market seats, leaving archaeological and anti-trade interests with disproportionate influence. Legal scholars Andrew L. Adler and Stephen Urice have noted concerns that the State Department has stripped CPAC of transparency and turned it into an advocate for increasingly broad import restrictions by controlling information, staffing the process with archaeologists, manipulating appointments, marginalizing dealers, and unevenly enforcing conflict-of-interest rules.⁸³

Today, public announcements have been replaced by brief agency summaries, and CPAC hearings have been compressed into short sessions covering multiple countries, with only a few minutes allotted to each speaker. Commenters often must address potential agreements without the evidence for looting or the actual scope of proposed restrictions.

The ‘cultivation’ of requests from foreign countries by the U.S. under the CPIA was not contemplated by the CPIA statute. Perhaps for this reason, the request process followed by the State Department—and the requests themselves—have remained secretive since the early 2000s, contrary to USIA and early State Department policy in the first fifteen years of the CPIA. Today’s publication of requests may state only that a country is seeking import restrictions on archeological and ethnological materials over a timeframe covering the virtually the whole of human development. This lack of transparency has run hand-in-hand with an extraordinary expansion of U.S. cultural property agreements—and a far broader scope of restricted items for new agreements in the last decade - since the Antiquities Coalition began its collaborative relationship with the State Department.

This pattern predates the founding of the Antiquities Coalition. In a lawsuit filed by the Ancient Coin Collectors Guild following the 2009 signing of a MOU that included coins with the People’s Republic of China, the Guild alleged that China never formally requested import restrictions on coins and that the State Department instead created the purported request.

Authors Andrew L. Adler and Stephen K. Urice stated in a groundbreaking law review article⁸⁴ that;

“If true, this action would contravene the reactive structure of the CCPIA, which authorizes the Executive to impose import restrictions only in response to a foreign nation... Thus, while a lack of transparency prevents us from discovering whether China in fact requested the United States to restrict the importation of coins, the government’s failure to refute that allegation, coupled with its previous circumvention of the “request” requirement, creates an inference of statutory noncompliance.”⁸⁵

Since at least 2017, however, the State Department appears to have acted in gross violation of the statute, going from its practice in the early 2000s of sending out ECA staffers to U.S. embassies to encourage foreign requests for import restrictions - to giving government grants to the Antiquities Coalition and other nonprofits specifically to develop such requests.

PART IV. GRANT-FUNDED GROWTH OF MOUS

“During my tenure as Chairman of CPAC, I became concerned about the secretive operations of the Cultural Heritage Center and its lack of transparency in processing requests for import restrictions made on behalf of foreign states. I believe this lack of transparency has hampered the ability of museums, private parties and others to make useful presentations to CPAC. I also believe that this lack of transparency has also hampered the ability of CPAC to provide recommendations to the executive branch about the best way to balance efforts to control looting at archeological sites against the legitimate international exchange of cultural artifacts. ... I specifically recall the Cypriot request that then current import restrictions on other cultural artifacts be extended to coins was a matter of great public controversy. CPAC considered the question specifically and I recall a special vote being taken on this particular issue. ... I believe it is absolutely false to suggest in those materials that the State Department’s decision to extend import restrictions to coins was consistent with CPAC’s recommendations.”

Declaration of Jay I. Kislak, *Ancient Coin Collectors Guild v. U.S. Department of State*, 2009⁸⁶

1. The State Department’s Cultural Property Agreement Boom

While a gradual expansion of the scope of State Department cultural property agreements has taken place since the early 2000s, the Antiquities Coalition has become a central actor in a veritable explosion of agreements since 2015, from sixteen agreements and emergency restrictions to thirty-six current in mid-2026, with four more country agreements pending.⁸⁷ As a State Department “partner,” the Antiquities Coalition participates in private and diplomatic cultural-property discussions, promotes the negotiation and renewal of MOUs, and benefits from a policy environment in which requests nominally made by foreign governments are encouraged or shaped through Department programs, grants, and partner organizations. Some State Department funding has supported conservation or documentation in countries already covered by agreements, while other funding has been directed toward generating new requests for restrictions.



Silver coin of Évanthès, King of Salamine, Cyprus, Bibliothèque nationale de France, département Monnaies, médailles et antiques, Photo Babelon 576.

Interestingly, although the Antiquities Coalition has ordinarily been on the receiving end of U.S. grants, the Antiquities Coalition’s 2017 IRS Form 990 reports a \$60,000 grant to the State Department, funding assistance to help governments prepare MOU request packages.⁸⁸

Other forms of support offered by the Antiquities Coalition included organizing and co-hosting State Department representatives, a group of U.S. cultural property experts, and representatives of seventeen Middle East and North African countries in Amman, Jordan in September 2016 to coordinate efforts in negotiating cultural memoranda of understanding and launch a “launch an awareness campaign against the purchase of “blood” and looted antiquities.”⁸⁹

However, grant funds going from the federal government to the Antiquities Coalition are far more significant, both in numbers and in policy impact. State Department-funded activities by the Antiquities Coalition and organizations such as the American Society of Overseas Research (ASOR) support new or expanded agreements, praising source-country stewardship while giving limited attention to weak enforcement, corruption, or failures of local protection.⁹⁰ In a report prepared for a 2022 board meeting, ASOR’s President noted that it depended heavily on the \$500,000 to \$700,000 it received each year in State Department grants and contracts.⁹¹ Organizations dependent on State Department grants or host-government approval for fieldwork have little incentive to challenge the assumptions behind these agreements. The State Department, in turn, can present curated records provided by funded organizations to CPAC that appear to satisfy CPIA requirements on paper.

The result is a regulatory regime very different from the one Congress authorized under the CPIA. Restrictions intended to be exceptional have become nearly permanent, while the Antiquities Coalition and allied organizations help supply

An Auroch symbol of Adad (Hadad), on the Ishtar Gate of Babylon, 575 BCE, reconstructed with original bricks, Pergamon Museum in Berlin, photo Mary Harrsch, 9 June 2016. CCA-SA 4.0 International license.





Ivory statuette of Assyrian man, from Well AJ at the North-West Palace, c. 9th to 7th century BCE. From Nimrud, Iraq. Excavated by an Iraqi team mid-1970s. The Iraq Museum, Baghdad. IM79520. 14 March 2019, Photo Osama Shukir Muhammed Amin FRCP(Glasg). CCA-SA 4.0 International license.

the advocacy, reports, and diplomatic support for continued expansion. For example, a cultural property agreement concerning Yemen was reportedly concluded after an invitation-only Antiquities Coalition-sponsored event, without legally mandated CPAC review or public comment.⁹²

The issue is not whether cultural heritage should be protected. Of course, it should be protected, and countries ought to be devoting far greater resources to doing so. The issue is whether the State Department is administering the CPIA according to its statutory limits or using partner-driven diplomacy to create a broad, permanent system of import controls never intended by Congress.

2. Federal Grants to the Antiquities Coalition

Since 2017, the Antiquities Coalition has received approximately \$3.3 million through thirteen federal grants, many connected to the development, completion, or expansion of cultural property agreements.⁹³ These include \$262,200 through the U.S. Embassy in Rabat “to support the completion of bilateral cultural heritage agreements – Morocco, Libya, Algeria”; \$58,700 through the U.S. Embassy in Tirana “to develop a request for a Memorandum of Understanding between the United States and Albania and two other European countries,” after which agreements followed with Albania, Turkey,

and Bulgaria; and \$187,000 for collaboration with Algeria’s Ministry of Culture.⁹⁴

Further grants included \$90,000 through the U.S. Embassy in Tashkent for working with Uzbekistan, Nepal, and India “by supporting the development of bilateral cultural property agreements”; \$246,000 through the U.S. Embassy in Ulaanbaatar for CPA [Cultural Property Agreement] requests within the Bureau of East Asian and Pacific Affairs portfolio; and \$99,000 through the U.S. Embassy in Colombo for three South and Central Asian countries.⁹⁵ The Antiquities Coalition also received State Department funding to establish a cultural preservation network linking U.S., U.A.E., and Gulf Cooperation Council stakeholders.⁹⁶

As noted above, the Antiquities Coalition also joined a State Department-supported conference in Cambodia in 2022 (with ECA’s Cultural Heritage Center) to build ASEAN regional cooperation.⁹⁷ The Antiquities Coalition convened another high-level ASEAN event in April 2026 on developing cultural property agreements with the U.S. in Jakarta, Indonesia in partnership with the U.S. State Department, with another meeting to follow soon in the Philippines.⁹⁸ This record raises very serious questions about whether new and renewed MOUs are being generated by the U.S. government and its grant-funded partners, rather than by source countries independently seeking protection for their own cultural heritage.

In effect, State Department funding has positioned the Antiquities Coalition as both advocate and implementer—providing expertise, training, and policy support that advance the priorities of a small but influential unit within the State Department while ensuring the steady expansion of CPIA agreements. U.S. government grant funding enables the Antiquities Coalition to frame its work in terms of global security and U.S. strategic priorities. At the same time, the absence of direct foreign government funding allows the Antiquities Coalition to present itself as an independent actor, even as it works closely with those governments and seeks out foreign former officials as advisors.

3. Private Money, Pro Bono Support, and Policy Access

Financially, the Antiquities Coalition has been well resourced: in its first nonprofit year it reported \$1.15 million in contributions, with subsequent annual revenues up to \$1.3 million—unusually large for a cultural NGO.⁹⁹ This war chest, combined with pro bono support from partners like the law firm Mayer Brown and public relations giant Edelman, has given the Antiquities Coalition outsized influence compared to older, shoestring-budget heritage groups.¹⁰⁰



This photograph of Palmyra, once one of the best-preserved classical sites in the Middle East, shows the site prior to the destruction in 2015, when the main sanctuary of the Temple of Bel was blown up and the Temple of Baalshamin was leveled. The same year, the central crown of the Arch of Triumph was dynamited and several multi-story tower tombs, including the Tower of Elahbel were destroyed - and in 2017 much of the Tetrapylon and parts of the Roman amphitheater's facade were destroyed. Palmyra, Syria, Author James Gordon, Los Angeles, CA, May 5, 2008, CCA 2.0 Generic license.

Private-sector support reinforces the Antiquities Coalition's strong financial position. In 2016, the Antiquities Coalition received funding from the Andrew W. Mellon Foundation¹⁰¹ to develop a Digital Library of Middle Eastern antiquities.¹⁰²

The Goldman Sachs Charitable Gift Fund, as well, contributed \$200,000 in 2021, \$200,000 in 2023, and \$125,000 in 2024.¹⁰³ While smaller than government funding, these amounts are significant relative to the budgets of peer organizations.

Just as important is the access this funding signals-embedding the Antiquities Coalition within overlapping networks of finance, diplomacy, and policy that enhance its influence beyond that of most heritage-focused NGOs.



Screenshot from ISIS video. The Islamic State released video showing militants using sledgehammers and drills to smash archaeological artifacts and reproductions displayed in Iraq's Mosul Museum, March 2015.

4. The Transparency Question: Foreign Influence and FARA

There is another, often cautiously framed question raised by critics of the Antiquities Coalition: whether its activities fall into what might be described as a FARA-adjacent space.¹⁰⁴ The Foreign Agents Registration Act (FARA) requires individuals or entities acting on behalf of foreign principals in a political or quasi-political capacity - lobbyists, in effect - to register and disclose those relationships and activities.

Basilinna Advisory LLC registered under the Foreign Agents Registration Act in January 2025 related to its advocacy for King Faisal Specialist Hospital and Research Centre. Its registration identifies Lehr as a 55% owner and chair/CEO and describes the firm's work as strategic advisory and communications.¹⁰⁵

Public materials alone cannot answer the legal question of whether FARA applies to Antiquities Coalition activities. But concerns are inevitable when a U.S. nonprofit actively promotes policy outcomes that align closely with the interests of foreign cultural ministries and characterizes itself as a "partner" of foreign governments. Equally important is whether an organization with such policy influence should meet a higher transparency standard. Clearer disclosure of foreign relationships, funding streams, and coordination would help resolve, rather than perpetuate, these concerns.

PART V. FROM ADVOCACY TO ENFORCEMENT: THE ANTIQUITIES COALITION AND THE MANHATTAN D.A.

“The patina of gentility we associate with the world of antiquities has always rested atop a solid core of criminal activity [and] we intend to expose those who engage in the illegal trade for what they are: criminals... The cozy cabal of academics, dealers, and collectors who turn a blind eye ... is in effect supporting the terrorists killing our troops in Iraq.”¹⁰⁶

“Going back to 2005, when al Qaeda was trafficking in antiquities, it was second only to kidnappings and ransom [as a source of funding]”. “...ISIS is making tens of millions, and that I am telling you that this is a low figure that is not exaggerated.”

Matthew Bogdanos, NY County Assistant District Attorney, in 2006 and 2015¹⁰⁷

Domestically, the Antiquities Coalition has a lengthy relationship with the Manhattan District Attorney’s Office, particularly its Antiquities Trafficking Unit (ATU), led by Assistant D.A. Colonel Matthew Bogdanos. In 2017, the Antiquities Coalition sponsored an “Everyday Hero Award” for Bogdanos and called him “a hero in heritage and a leader in the fight against cultural racketeering.”¹⁰⁸ The Coalition regularly praises the D.A.’s office for high-profile seizures and repatriations of allegedly looted “blood antiquities,” many of which had been held in private or institutional collections for decades.¹⁰⁹ The Manhattan District Attorney’s Office has formally credited Tess Davis, its Executive Director, with providing investigative support to Bogdanos’s Antiquities Trafficking Unit.¹¹⁰

Through public statements and op-eds, the Antiquities Coalition amplifies these enforcement actions. For example, it highlighted the return of 107 antiquities to Italy, valued at \$1.2 million, as a major success in combating cultural racketeering.¹¹¹ These objects were seized from the Museum of Greek, Etruscan and Roman Art at Fordham University in the Bronx—a free, publicly accessible teaching collection used by students and researchers.

The seizure removed more than one-third of the museum’s holdings, including several magnificent ceramic vessels.¹¹² They had been donated by William D. Walsh, a Fordham alumnus and former federal prosecutor well-known for indicting Vito Genovese, head of the Genovese crime family.¹¹³

The alignment between the ATU’s enforcement agenda and the Antiquities Coalition’s advocacy is notable. Both characterize objects in trade, and many sitting in museum collections for 40-100 years, as “looted,” based on foreign, source country laws. The Antiquities Coalition cites the ATU’s headline figures as evidence of large-scale trafficking. By 2023, the ATU claimed to have seized more than \$485 million worth of antiquities since its founding in 2017,¹¹⁴ although such valuations have been criticized as wildly exaggerated.¹¹⁵ That total includes the highly publicized case of collector Michael Steinhardt, who surrendered 180 objects valued at \$70 million and agreed to a lifetime ban on collecting.¹¹⁶

The Antiquities Coalition’s “Most Wanted” lists of missing antiquities and interactive mapping of trafficking networks¹¹⁷ are resources that law enforcement can tap as “evidence” of illicit trade. The Antiquities Coalition’s executive director Tess Davis, herself a lawyer, appears alongside prosecutors at art crime conferences, and Manhattan prosecutors have spoken at Antiquities Coalition events.¹¹⁸

The Antiquities Coalition encouraged the Metropolitan Museum of Art to convene a task force on looted art after the ATU seized objects from the museum.¹¹⁹ Within months, under this and other public pressure, the Met began reviewing dozens of antiquities in its collection. In this way, the Antiquities Coalition supports ATU goals, using public campaigns to spotlight targets, then promoting enforcement outcomes as evidence of a crisis requiring legislative intervention.¹²⁰



Frescoes, Monastery of Saint Moses the Abyssinian, Mar Musa or Deir Mar Musa al-Habashi, Nabk, Syria, 11th - 12th century CE, photo James Gordon, 8 April 2010, CCA 2.0 Generic license.

PART VI. FROM SEIZURES TO BANK-STYLE REGULATION: THE ANTIQUITIES COALITION'S LEGISLATIVE CAMPAIGNS

“Criminals seeking to launder ill-gotten funds could hardly pick a worse commodity than antiquities.”

Randall Hixenbaugh, Jan 1, 2021¹²¹

1. Expanding Seizure Power: The Failed First TAAR Act

The Antiquities Coalition has worked hard to promote legislation to expand the scope of seizures of objects that left source countries without permission, no matter how long ago, and backed bills to make even small antiques businesses subject to the same reporting rules as banks, working in partnership with anti-money-laundering compliance firms.¹²²

In 2016, the Antiquities Coalition urged Congress to pass the Terrorism Art and Antiquity Revenue Prevention (TAAR) Act.¹²³ The bill would have amended the National Stolen Property Act of 1948 to prohibit the transport, sale, or receipt of cultural property removed in violation of a source country's laws. As drafted, it modified the National Stolen Property Act¹²⁴ to treat any “cultural item” valued over \$50 and exported in violation of any foreign law, at any time, as stolen property. In practice, this would have exposed individuals and institutions to federal criminal liability for objects that had entered the United States decades earlier and had changed hands multiple times.¹²⁵

Existing U.S. law already recognized certain foreign ownership claims but imposed a \$5,000 threshold and knowledge of criminal action for criminal liability.¹²⁶ The TAAR Act's proposed reduction to \$50, combined with its retroactive reach, would have dramatically expanded potential liability while creating an unworkable compliance burden-requiring business and collectors to reconstruct and interpret foreign legal regimes across decades. The American Bar Association joined museum and art trade organizations in raising objections to its scope and costs of compliance to small businesses. These concerns proved decisive; the bill failed to gain traction and was not enacted.

2. Manufacturing an AML Crisis in the Art Market

The Antiquities Coalition has played a central role in promoting the claim that the American art market presents a major money-laundering threat, despite the absence of evidence showing widespread money laundering through ordinary



Mural in the city of Homs, Syria, 2015 during the war that started in 2011 and devastated the country. Амгэд Бэблэві: 2015, Амгэд Бэблэві, CCA-SA 4.0 International license.

U.S. art-market transactions. It treats the art market's limited Bank Secrecy Act coverage as a national-security crisis, but the case studies it relies on are relatively few—outside of the U.S.—and frequently involve conduct only tangentially related to customary buying, selling or museum practice in the United States.

Rather than demonstrating a pervasive pattern of large-scale money laundering in the U.S. art trade, many of the examples cited by the Antiquities Coalition concern sanctions evasion, fraud, tax offenses, drug trafficking, stolen property, or foreign kleptocracy, as well as foreign rather than U.S. criminals, whose recovered assets include art as one category of property among many. Other cases involve attempted but incomplete laundering through routine art-market channels—people who gave up or were caught. In all these cases enforcement against bad actors is justified. However, there is no showing that legitimate galleries, auction houses, collectors, or museums are being used as money-laundering conduits.

Despite this paucity of evidence, the Coalition created a Financial Crimes Task Force in 2020, and their rhetoric presents the U.S. art market as “the largest unregulated market in the world.”¹²⁷

The result is a public impression of crisis without a real-world basis. The Financial Crimes Task Force recommendations also created a ready-made market for compliance vendors, several of whom were partners in the task force.¹²⁸ Thus, while generating unwarranted anxiety about unproven claims of art-based money laundering in the United States, it also created a promotional platform for the AML-service industry that stands to profit from that anxiety.

3. From Advocacy to Law: The 2020 AMLA

The Antiquities Coalition has supported a series of legislative efforts to bring the art and antiquities trade under Financial Crimes Enforcement Network (FinCEN) anti-money laundering (AML) requirements. These proposals have been opposed by more than thirty-two art and antiques associations across twenty-two countries, along with U.S. numismatic groups and art market professionals.¹²⁹

Since 2018, a number of bills have sought to extend anti-money laundering provisions like those applied to banks and financial institutions to art or antiquities businesses, including mom-and-pop enterprises selling as little as \$50,000 in inventory a year.¹³⁰

For example, the Illicit Art and Antiquities Trafficking Protection Act, introduced in May 2018, was promoted to “help to close the \$26.6 billion American art market to money laundering, terrorist financing, and other crimes.”¹³¹

This 2018 bill would have made art and antiquities dealers subject to the Bank Secrecy Act (BSA), which requires financial institutions and businesses like casinos, pawnbrokers, and real estate professionals with large cash transactions to file detailed reports to the federal government. Deborah Lehr later referred to the lack of specific regulations on the art trade as placing the U.S. at risk of “becoming a safe haven for criminals.”¹³² Yet art businesses operate like other ordinary businesses. They are not cash oriented. They have regular bank accounts and have employees and pay taxes like everyone else. Far from being dangerously unregulated, their transactions are subject to the exact same scrutiny as any other business.

One anti-money laundering measure directed at the art trade was subsequently passed by Congress and signed into law, making “antiquities dealers” subject to the Bank Secrecy Act. The Anti-Money Laundering Act of 2020 (AMLA) was supported by the Antiquities Coalition. It consisted of several paragraphs added to the middle of the 2020 National Defense Authorization Act, which was 387 pages of legislation essential to funding the U.S. military.¹³³ Notably, the AMLA did not define “antiquities dealers,” leaving a critical term unresolved.

The Antiquities Coalition, along with the Clooney Foundation for Justice, further urged that “antiquities” be interpreted broadly, in line with the 1970 UNESCO Convention—encompassing not only archaeological objects but also books, furniture, ethnographic and folk items, photographs, coins, currency, and postage stamps and other categories of cultural property and urged that museums should also be covered by the bill.^{134,135}



Cemetery destroyed by ISIS, Qayyarah town, Mosul Distric, Northern Iraq, Western Asia. Photo Mstyslav Chernov, 10 November 2016. CCA-SA 4.0 International license.

4. The Treasury Report Undercuts the Crisis Narrative

Somewhat ironically, a February 2022 report from the U.S. Department of the Treasury, commissioned under the 2020 AMLA, found limited evidence of money laundering in the high-end art market and virtually no evidence linking antiquities transactions to terrorist financing.¹³⁶ The Treasury concluded that, as many in the trade had previously asserted, the market was largely self-regulating, with many participants already employing due diligence and Know Your Customer practices, and that it should not be an immediate priority for comprehensive AML regulation.¹³⁷

While acknowledging certain vulnerabilities-high-value transactions, portability, and a degree of transactional privacy-the U.S. Department of the Treasury also reported mitigating factors, including dealers' low reliance on cash and established client vetting practices. It characterized small and mid-sized galleries and dealers as relatively low risk and found that in the instances when laundering of money using art has occurred, it was typically conducted by external actors, not art market professionals.

The Treasury outlined possible future measures-improved information sharing, clearer law enforcement guidance, targeted reporting requirements, and potential alignment with European Union standards-but said that it made more sense to prioritize higher-risk sectors such as real estate and beneficial ownership.¹³⁸ As of June 2026, the Treasury has still not implemented regulations for antiquities dealers, nor has it formally defined the category.

5. The 2025 Art Market Integrity Act: AML Regulation Returns

On July 23, 2025, Senators John Fetterman and Chuck Grassley introduced The Art Market Integrity Act (S. 2400), in response to concerns that the art market might be exploited by sanctioned individuals, kleptocrats, and terrorist organizations to conceal assets. Former Presidential delegee for the Cultural Property Advisory Committee at the State Department and Goldman Sachs senior administrator Dina Powell McCormick's spouse, Senator Dave McCormick, is also a sponsor of the bill. While proponents argue that the bill would align the United States with international anti-money laundering standards, critics dispute this claim, as the legal frameworks are very different. The requirements for reporting in the UK and Europe are based upon individual or linked transactions, not an annual overall dollar threshold. The proposed U.S. law would subject quite small art businesses to extensive Bank Secrecy Act compliance



Rukmini Devi Temple, Dwarka, ASI monument number N-GJ-128, showing significant natural deterioration of soft sandstone, as atmospheric erosion has significantly aged the unrestored 12th century structure. Photo Madhuranthakan Jagadeesan, 1 October 2013, Creative Commons Attribution-Share Alike 4.0 International license.

obligations and costs, reporting requirements, and potential civil and criminal penalties if, in the prior year, they had sold any work of art for over \$10,000 or had total art sales of \$50,000.

All this, despite a continued lack of evidence that such draconian regulation is necessary. Writing in support of the 2025 Art Market Integrity Act, the Antiquities Coalition continues to cite to a 2014 case involving brothers Arkady and Boris Rotenberg, both Russian billionaires and ‘judo pals’ of President Putin,¹³⁹ who moved \$18 million dollars in art in the U.S., as well as a sanctioned¹⁴⁰ Lebanese diamond smuggler and modern art collector, Nazem Ahmad, who purchased and exported \$450,000 in modern paintings from the U.S.¹⁴¹ as primary examples of the evils of the trade—despite no antiquities having been involved in either case.¹⁴²

All U.S. businesses must already abide by federal sanctions regulations to avoid any dealings with criminal/terrorist supporters and organizations. The largest art market players, from major dealers to art fairs to auction houses to museums, have already taken important steps to limit the risk of art being used to launder money, adopting standardized best practices to confirm identities and the sources of clients’ funding.¹⁴³

It is worth remembering that the majority of antiques and antiquities businesses are micro-enterprises, with fewer than five employees, operating within already heavily regulated financial systems in jurisdictions such as the United States, United Kingdom, European Union, Japan, and Australia. Dealers’ inventory turnover is slow, their clientele tend to be ordinary people rather than fashionable celebrities, and their markets are limited.

The most threatening impact on the art trade of the U.S. Art Market Integrity Act is the high financial cost of compliance.¹⁴⁴ Passage would force small businesses to spend thousands of dollars a year on filing the same security reports as banks or risk having their accounts permanently frozen, as well as criminal penalties.¹⁴⁵ These requirements, if implemented, would drive all too many small dealers out of business.



Ram Mandir shrine built over destroyed Babri Mosque in Ayodhya, Uttar Pradesh, India, inaugurated on January 22, 2024, by Prime Minister Narendra Modi, Government of India license.

PART VII. PUBLISHING THE CRISIS: TURNING EXAGGERATED CLAIMS INTO POLICY

“...complying voluntarily with “know your customer” procedures to identify and share information about traffickers who proffer questionable pieces to a dealer, or simply agreeing to report to law enforcement the names of sellers and buyers of antiquities, would help authorities police the market and could thereby earn the dealer a tax reduction.”

Lawrence Rothfield, 2016¹⁴⁶

1. A “Pollution Tax” on Lawful Collecting

The Antiquities Coalition often claims to support a “lawful” market. But in 2017, it revealed a different side with Policy Brief No. 2, proposing a 10% or higher “pollution” (Pigovian) tax on legal antiquities and Native American art.¹⁴⁷ The premise was blunt: treat the antiquities trade not as a cultural or scholarly activity, but as a social harm—closer to industrial emissions than to education or preservation.

Authored by University of Chicago professor Lawrence Rothfield, the brief largely dismissed the benefits of the legal market—museum access, academic research, conservation, and cross-cultural exchange—and instead framed taxation as a needed behavioral tool, making collecting antiquities unacceptable by labeling it as harmful to society.

The proposal included a “Superfund”-style pool to finance enforcement and site protection, with contributions based on market activity. Dealers were offered a way to reduce their tax burden by reporting buyer and seller identities to authorities, recasting legitimate businesses as extensions of law enforcement, and further stigmatizing participation in the market as inherently suspect.



Babri Masjid, 1883-1887, photo by Samuel Bourne, destroyed by a mob after false claims that it was built over an ancient Hindu temple. December 6, 1992, J. Paul Getty Museum photography collection, public domain.

Despite being presented as an “economic” solution, the proposal was weakly founded on inflated claims about the scale and profitability of the illicit antiquities trade—claims the Antiquities Coalition itself had helped circulate—while assigning the financial burden to participants in the legal market. The result was less a serious policy instrument than a punitive framework: tax lawful activity as if it were the source of crime and use regulation to shrink it.

2. The #CultureUnderThreat Report and the Terrorism Narrative

While the Antiquities Coalition has published numerous policy briefs, its most prominent publication remains the #CultureUnderThreat Task Force Report with the Asia Society. The report asserted a direct link between a supposed “multi-billion-dollar demand for art and antiquities” and the destruction of ancient sites.¹⁴⁸

While there is unquestionable evidence of terrible destruction by ISIS (DAESH) and similar extremist groups, the report presented almost no hard evidence of artifacts being sold by ISIS, even less the supposed millions (to say nothing of billions) claimed previously to be trafficked in Europe and the United States. By focusing on non-government looting and terrorist financing, the report largely ignored stronger evidence implicating state actors, security forces, politically connected networks, and corrupt officials in Iraq, Syria, Egypt, and North Africa.¹⁴⁹

Even the body of the final #CultureUnderThreat Task Force Report cited relatively small figures for the value of illicit antiquities, such as the preliminary \$1.25 million estimate derived from the Delta Force raid on office of ISIS oil and gas financial officer Abu Sayyaf.¹⁵⁰ It also cited State Department statements that ISIS (Daesh) had earned “several million dollars” from antiquities trafficking since mid-2014.^{151,152}

3. The Evidence Gap: ISIS, Abu Sayyaf, and the Missing “Multi-Billion-Dollar” Market

In September 2015, the U.S. officials and the United Nations presented declassified documents detailing ISIS’s network of antiquities looting.¹⁵³ The documents released, including three of the eight receipts found in the raid, accounted for about \$24,000 in taxes, which was “[l]ess than a tenth of what was reported in the overall amount.”¹⁵⁴ Writing in *The New Yorker*, Ben Taub ultimately concluded that either Abu Sayyaf was a “lousy accountant” or that “[t]he documents proved that ISIS maintains a ‘marginally profitable’ antiquities division.”¹⁵⁵

In a report commissioned for the Dutch National Police, a different story emerged from the somewhat stilted text:

“A high ranking IS member called Abu Sayyaf Al Iraqi was killed and in his house and (electronic) documents and cultural property was found [information]that indicated a financing structure. This structure consists of a ‘Diwan al Rikaz’, a Ministry for Natural Resources, with two departments: an oil department and an antiquities department (archaeological treasures and valuable plundered items). This Ministry is geographically divided in two: a Western Governorate (Syria) and an Eastern Governorate (Iraq). Abu Sayyaf was the leader of the Syrian branch. These documents found at his house [gave] an account of approximately \$260,000 [in taxes] in a four month period in the Deir ez-Zor province in Eastern Syria. Deir ez-Zor is an area with multiple archaeological sites and all those sites have suffered from illegal excavations according to UNESCO... The collection of cultural property that was found in Abu Sayyaf’s house was turned over to the Iraq National Museum by the US Department of State. The collection consisted of coins, Christian books, an ivory plaque stolen from the Mosul Museum and fake items.”



Tank at Hampi, ASI monument number N-KA-B49. Loss of maintenance in original stone aqueducts and intake channels has left historic basins dry or improperly drained, causing uneven thermal expansion and contraction in the stone tiers. Unregulated tourist movement, accidental abrasion, and climbing on delicate historic masonry has accelerated surface wear throughout. Photo by Jonathan Freundlich, 13 November 2011, 10:36:53 Creative Commons Attribution-Share Alike 3.0 Unported license.

Tim van Lit, September 2016¹⁵⁶

That \$260,000 figure represents the totality of Abu Sayyaf’s collected taxes on everything that ISIS was seizing, including oil and gas, which were the most valuable assets from this region. Antiquities appear as a sideline and both the objects found and those in photographs on his computer were accounted of little value. This report does not constitute evidence for “multi-billions” in antiquities trade, or anything approaching that figure—nonetheless, unsupported multi-million- and billion-dollar figures in terrorist revenues have repeatedly echoed in Antiquities Coalition publications and continue to permeate media coverage and academic discourse influenced by Antiquities Coalition narratives.¹⁵⁷

The #CultureUnderThreat Task Force Report’s tone was alarmist, calling for a whole-of-government response that extended from intelligence agencies such as the National Security Agency to civilian bodies like the Peace Corps. While some recommendations were constructive, such as creating a roster of military personnel with cultural heritage expertise, compiling “no-strike” lists of vulnerable sites, and improving coordination among U.S. forces, NATO, and UN peacekeeping operations, others were disconnected from the realities of the ISIS conflict.

There is scant evidence that conflict-related antiquities from Syria or Iraq were entering the United States—apart from a few ancient seals bought in Middle Eastern markets and seized from returning journalists. However, the #CultureUnderThreat Task Force treated antiquities collecting as inherently suspect and tainted by ISIS activity. It urged the creation of specialized DOJ prosecutors, heightened IRS scrutiny of art-donation deductions, and proactive State Department pursuit of new bilateral cultural property agreements.¹⁵⁸

Framed as counterterrorism measures, such calls implicated lawful market activity and long-circulated, legally imported artifacts in the United States, rather than ISIS revenue streams.



Seized on import to Canada, the 'Parrot Lady' statue had been bought by an Alberta retiree as a replica for home decoration for \$3,818. The Prime Minister of India, Shri Narendra Modi is shown at repatriation ceremony with Prime Minister of Canada Mr. Stephen Harper in Ottawa on April 15, 2015. Licensed under the Government Open Data License - India (GODL)

More than a decade later, evidence of ISIS antiquities sales in the United States remains lacking. In 2015, Deputy Secretary of State Antony Blinken announced a Rewards for Justice offer of up to \$5 million for information on ISIS oil and antiquities networks. There is still no record of any antiquities-related payout.¹⁵⁹

Later reporting further weakened the ISIS-trafficking narrative, attributing major conflict looting in Syria to forces aligned with U.S. regional partners and, after Assad's fall, Syrian sources became willing to publicly name figures within the former regime's inner circle.¹⁶⁰

"Bashar Talal Al-Assad is also active in the illegal antiquities trade... Various parties cooperate in the antiquities trade, but all pass through the sons of the Assad family. The Syrian authorities largely ignore antiquities, and the trade therein is not subject to any control."

Maksim Othman, April 6, 2021

Readers may find it interesting to compare the Antiquities Coalition's dramatic claims in its #CultureUnderThreat report to the far more useful publication *Fighting Bogus Information About the Art Market*,¹⁶¹ produced by CINOA (Confédération Internationale des Négociants en Œuvres d'Art), a 5,000-member global federation of art and antique dealers, which draws from a well-cited meta-analysis of independent studies.

4. From Report to Regulation: How the Narrative Entered U.S. Policy

In 2016, Lehr asserted that ISIS was trading treasure for weapons.¹⁶² That claim, that antiquities trafficking is a vast black market directly funding terrorism, became the foundation for the Antiquities Coalition's broader policy agenda to restrict or effectively end the antiquities trade, by reframing it as a national security issue.

The same framing quickly migrated into U.S. policymaking. In April 2016, Representative Eliot Engel stated that ISIS had "pocketed millions" from antiquities, while advocating legislation aligned with the Antiquities Coalition's goals.¹⁶³ During passage of Engel's Protect and Preserve International Cultural Property Act, which prohibited entry of Syrian-origin antiquities into the United States (enacted May 9, 2016),¹⁶⁴ an Antiquities Coalition-supported House fact sheet claimed ISIS was earning "tens of millions annually" from looting and trafficking.¹⁶⁵

5. The Collapse of the Billion-Dollar Claim

“What all of these caveats and complications boil down to is that ISIS, according to one estimate by the U.S. State Department, is likely to have earned several million dollars in profit since launching its looting program... Moreover, antiquities are imbued with mystique. They are treasure, hidden away in the ancient soil and waiting to be rediscovered. This, in turn, motivates governments and other groups opposed to the Islamic State to describe their actions in attention-grabbing terms. It’s a lot easier to call for action against a \$7 billion crime than a \$4 million one.”

Fiona Rose-Greenland, May 31, 2016¹⁶⁶

A University of Chicago based MANTIS project (Modeling the Antiquities Trade in Iraq and Syria), was funded in part by the Antiquities Coalition. Led by the Institute for the Study of Ancient Cultures, the project used satellite data and economic modeling to analyze looting patterns and estimate market values.¹⁶⁷

However, MANTIS’ findings did not support the inflated figures circulating in policy and media narratives. Sociologist Fiona Rose-Greenland, a principal investigator on the project, has explicitly criticized the billion dollar claims as exaggerated and analytically unsound, noting that the trade generated far lower revenues than commonly asserted and that misunderstanding its structure would lead to ineffective policy.¹⁶⁸

The destruction was real; the revenue was far less certain. Videos of terrorists bulldozing ancient mosques and jackhammering monumental Assyrian sculptures told a terrible story. Images of looters’ pits and damaged monuments demonstrated activity on the ground, but they did not show what artifacts, if any, reached international markets or what value they might have there. Nor was there a corresponding surge of identifiable Syrian or Iraqi antiquities appearing in Western sales channels.

At the same time, the legitimate art market continued to strengthen its own due diligence measures designed to prevent trading in illicit material. Dealer organizations encouraged following guidelines and toolkits published by the Responsible Art Market Initiative (RAM) established by the trade in 2017.¹⁶⁹

6. The Afterlife of an Inflated Market Narrative

Nevertheless, large revenue estimates and other unsupported statistics continued to circulate, often accompanied by caveats that “no one really knows” the scale of the trade, even as the headline figures were repeated in literally dozens of articles each year.¹⁷⁰

By late 2016, the report commissioned by the War Crimes Unit of the Dutch National Police concluded that while some illicit antiquities activity linked to ISIS existed within the Middle East, there was no evidence of large-scale operations or revenues approaching the levels commonly asserted in public discourse.

“Media reports are barely based on primary sources but rather copy each other’s headlines, leading to over exaggeration and unfounded estimates of IS revenues. Despite the lack of evidence for a large-scale illegal trade network benefiting IS, governments stress the importance of fighting this assumed vital source of income for IS. Evidence for large-scale operations is not found...”

“Furthermore, it is more likely that agencies become overloaded with reports of illegal cultural property, to later discover that such items are practically worthless; or found and sold by impoverished farmers or refugees (to gain some quick cash to survive or pay for the journey to Europe); or fake.”

Tim van Lit, Cultural Property, War crimes and Islamic State¹⁷¹

Ten years later, the anticipated flood of ‘looted’ artifacts still has not appeared, and the purported terrorist funding from illicit antiquities-derived revenue remains unproven. However, there is a little-considered human cost to highly publicized claims that Middle Eastern diggers make billions of dollars from antiquities: the creation of a fantasy market in the Middle East itself. Instead of protecting heritage, such tales encourage desperate people to believe that buried objects and rumors of treasure can bring sudden wealth.¹⁷²



In February and March 2001, the Taliban took sledgehammers to the Kabul Museum collections, smashing over two thousand ancient statues and artifacts depicting human or animal forms. This photo of the Bamiyan Valley at sunrise shows the empty niche where the giant Buddha once stood, blown up by the Taliban in March 2001. The U.S. has a cultural property agreement, executed after the Taliban takeover in 2021, and renewed in April 2026. Restrictions cover of a comprehensive inventory of Afghanistan's ancient and ethnographic art. The CPIA law requires their return to the State Party, Afghanistan. Photo Afghanistan Matters from Brunssum, Netherlands. CCA 2.0 Generic license.

PART VIII. THE DATA: INDEPENDENT STUDIES UNDERCUT THE ANTIQUITIES COALITION'S CRISIS NARRATIVE

“In the absence of grounded data, journalists, researchers, and policy experts regularly inflate the importance of antiquities trafficking in funding for international terrorism and organized crime. Linking cultural property crimes to these high-profile law enforcement issues offers a means to bring funding and political attention to what has traditionally been an underrecognized issue. However, the facts and figures used to support these arguments are often misinterpreted or overstated. Unsubstantiated claims about the relationship among looting, weapons, drugs, and money laundering are common in both expert and popular publications, and inaccurate or exaggerated estimates of stolen items’ value abound.”

Matthew Sargent, et al., RAND Corporation¹⁷³

1. RAND and the Repetition of Unsupported Claims

Recent independent research—most notably from the RAND Corporation—contradicts the Antiquities Coalition's claims about both market scale and terrorism. RAND's comprehensive 2020 study, *Tracking and Disrupting the Illicit Antiquities Trade with Open-Source Data*, covered the widespread claims of terrorist connections and of the existence of a vast underground Internet market in antiquities, debunking both. The RAND report concludes that public debate has been driven by repeated but weakly supported assertions that a large, highly organized, multi-billion-dollar antiquities market is funding terrorism.¹⁷⁴



Archival photograph of Buddhist statues discovered at the stupa of Loriya Tangai, present day Pakistan, excavated by Alexander E. Caddy in January 1896, copy photo by Jean-Pierre Dalbéra, Humbolt Forum, Berlin, CCA 2.0 Generic license.

At the core of RAND's critique is what it describes as a pattern of misinterpretation and amplification in publications on ISIS and the antiquities trade. Widely cited figures for the profits from antiquities were in fact broader wartime revenue totals in which antiquities played only a minor role. Similarly, the oft-repeated claim that antiquities trafficking is the "third-largest criminal trade after drugs and weapons" has no empirical basis; both INTERPOL and the UN Office on Drugs and Crime (UNODC) acknowledge that they lack the credible, standardized data needed to accurately measure or rank an illicit trade in global cultural property.¹⁷⁵

2. The Myth of a Billion-Dollar Antiquities Market

RAND's own findings are blunt. Using open-source data across auction houses, online platforms, and known trafficking channels, it concludes that observable markets are "smaller and less organized" than commonly portrayed. The total antiquities market—licit and illicit combined—is estimated at "at most, a few hundred million dollars annually," not billions.

RAND reported that total 2015 sales of Greek, Roman, and Egyptian antiquities at Bonhams, Sotheby's, and Christie's came to about \$41 million, with provenances sometimes traceable back centuries, and only \$326,000 of sales involving objects whose provenance could not be established before 2000.¹⁷⁶ RAND also noted that 25% of items offered in those auctions were not sold, reinforcing the picture of a relatively limited and generally sluggish high-end marketplace.

Equally important, RAND finds no evidence of the infrastructure needed to sustain a billion-dollar illicit pipeline. It reports no large volumes of antiquities sales on platforms like Facebook or Telegram, and "virtually no evidence" of antiquities trading on the dark web. Even in channels associated with arms trafficking, antiquities barely appear—one study identified just four ancient coins among roughly 20,000 weapons-related postings, likely incidental rather than indicative of a combined market.¹⁷⁷

3. Terrorist Financing Claims and the Evidence Gap

The RAND report is especially direct on terrorism. The widely asserted link between antiquities trafficking and terrorist financing rests on thin sourcing, often based on anecdotal wartime accounts rather than systematic evidence. It notes that many citations ultimately circle back to a narrow set of early claims, none of which have been independently verified, and adds that many of those claims are connected to the wartime experiences of Matthew Bogdanos, the Assistant District Attorney who founded the Manhattan District Attorney's Antiquities Trafficking Unit.¹⁷⁸



Mes Aynak, Seated Buddha. Photo Brent Huffman, "Saving Mes Aynak." Archeologists have uncovered countless priceless artifacts at a vast ancient Buddhist settlement south of Kabul: an ancient copper mine, a series of monasteries, homes and workshops. The Taliban have been negotiating with Chinese companies to develop a pit mine erasing the site completely since 2021. Chinese tents are seen in background.

The RAND report also identified a structural problem: in the absence of solid data, claims about antiquities trafficking can be inflated almost without constraint—particularly when framed in terms of terrorism, which attracts political attention and funding. RAND quotes Lehr acknowledging that “there’s no real information or statistics on the size of this illegal trade,” yet still voicing estimates such as “\$2 billion” out of Syria and “\$3-10 billion” with Egypt.¹⁷⁹ The report comments that there has been “little apparent effort” to ground such estimates in data, even as multi-billion-dollar estimates continued to circulate in advocacy and policy discussions.¹⁸⁰

4. Independent European Studies Reach Similar Conclusions

Other major studies reinforce this conclusion. The 2019 Ecorys report for the European Commission found no reliable statistics on the scale of the trade and no new evidence linking antiquities trafficking to terrorism.¹⁸¹ Ecorys’ snapshot-based estimate for European vendors was that 140,000–700,000 antiquities (including European antiquities) were sold annually (valued €64M–€318M), plus a large annual volume of ancient/medieval coins (minimum 298,379) valued above €56M. These numbers speak to the overall low values and scale of online circulation, not to criminality.¹⁸²

A 2017 Deloitte analysis for the European Commission similarly concluded that “hard evidence...is often lacking,” with no substantiated connection between cultural goods trafficking and terrorist financing in surveyed data.¹⁸³ Analyst Ivan Macquisten describes the high values associated with terrorist looting and revenue without substantiating evidence as “zombie statistics.” He notes Deloitte’s non-conclusory ‘conclusion’ was placed next to a bar chart showing zero evidence of terrorist financing.¹⁸⁴

5. World Customs Data: A Real but Marginal Illicit Trade

Data from the World Customs Organization (WCO) provides a useful reality check in this context. According to their survey, “cultural heritage” represents only about 0.2% of reported global illicit-trade seizures, the smallest category.¹⁸⁵ That figure is broad, including furniture, silver, antiques, and antiquities; within antiquities, coins are the most commonly seized objects.¹⁸⁶ Taken together, the WCO data suggests a modest, fragmented illicit trade in cultural property—real, but quantitatively marginal—rather than the large-scale, high-value global threat often described in policy advocacy.

The evidence is consistent: illicit antiquities trafficking exists and can cause real harm, but it is not large, centrally organized, or credibly shown to be a major source of terrorist finance.

PART IX. HOW BIG IS THE ANTIQUITIES TRADE, REALLY?

“[I]t remains impossible, to this day, to precisely rank illicit traffic in cultural objects so as to measure it to other types of transnational crimes.”

Frances Desmarais, International Council of Museums¹⁸⁷

Even the market for licit ancient art is one of the smallest sectors of the global art trade. While the worldwide art market generated approximately \$57.5 billion in sales in 2024, the annual market for antiquities, provenanced and unprovenanced, is estimated by experts such as former Metropolitan Museum director Philippe de Montebello at \$100 to \$150 million,¹⁸⁸ well under 1% of total art-market activity. Independent archaeological and art world estimates have reached broadly similar conclusions, suggesting that the legal market remains modest in size and that any illicit component is only a fraction of the lawful trade. The scale of the global market is so limited that major art-market analyses such as Art Basel & UBS and Artnet do not report antiquities as a standalone category, instead grouping them with antiques, furniture, silver, and carpets.¹⁸⁹ Contemporary and postwar/modern art dominate the art market both in value and turnover.

Oxford scholar Neil Brodie describes the antiquities market as a high-volume but relatively low-value sector. In a 2020 Dubrovnik conference presentation, he cited the same numbers as the above Ecorys report.¹⁹⁰ Those figures indicated a market dominated by inexpensive artifacts, coins, and minor antiquities rather than the rare museum-quality masterpieces that attract public attention.

Unlike contemporary art, which is characterized by rapid turnover and frequent speculation, the antiquities market is marked by slow sales cycles and low inventory turnover. Objects often remain in dealer inventories for extended periods before finding buyers, reflecting a specialized collector base and limited demand. Dealer surveys consistently rank antiquities among the slowest-moving segments of the art market.¹⁹¹ As most objects on the market have circulated for decades, whatever portion of the antiquities trade is made up of recently smuggled or looted objects is a far smaller fraction of that already minuscule share.

Perhaps most striking is the apparent absence of growth. Estimates produced decades apart by museum experts, parliamentary inquiries, dealer associations, and academic researchers all place the total market within roughly the same range. Even the Antiquities Coalition has acknowledged that the antiquities market has stagnated or even contracted over the course of the twenty-first century, making it one of the least dynamic sectors of the global art trade.¹⁹²

The closest regularly measured art market segment to antiquities is the tribal, ethnographic, Asian and Oceanic art market, an auction sector in which ancient art from Asia, the Mediterranean, and the Near East also figures as a minor category. Global auction market analysis of the ethnographic market sector by Artkhade found that the highest auction prices reached €9.7 million for a single object,¹⁹³ while between 83%-95% of auction lots sold for less than €10,000 and the average auction price was about €9,220 per object.¹⁹⁴ According to Artkhade, the primary source for auction sales in this area, sub-Saharan African works continued to dominate the market, accounting for €24 million in sales, 56.1% of total market value, and 49% of all lots sold.¹⁹⁵

These figures underscore both the modest scale of the field and the concentration of value in a handful of exceptional works. The United States is a relatively minor participant in this sector, with only €4.7 million in 2025 auction sales.



A hoard of 9724 Roman coins found while metal-detecting on cultivated land in Huntingdon, Cambridgeshire. Discovery was reported to the Portable Antiquities Scheme (PAS), a very successful program for preserving archaeological discoveries by metal detectorists and others. Under the PAS, a network of experts will professionally excavate or gather found items and record them to an online database, now holding over 1.7 million items. Finders can be paid a fair price by British museums, or they will be returned and the finders can dispose of them legally. Photo Helen Fowler, 15 May 2018. CCA-SA 4.0 International license.



Between 1915 and 1920, more than a million Armenians died and many more lost homes and families through systematic deportations during the Armenian Genocide. About 500,000 children are believed to have died - murdered, starved, or collapsing on forced death marches during the genocide. Many orphans who survived were forced to assimilate in orphanages, denied their names, language, religion and history. Armenian Genocide Museum-Institute, copy of photo of Armenian orphan girls, after 1915, Garvick, CCA-SA 4.0 International license

PART X. EMPTY CASES, LOST ACCESS: THE PUBLIC COST OF CULTURAL PROPERTY OVERREACH

1. Museums Under Pressure

In the United States, the impacts of recent cultural property policies have fallen most heavily on public institutions, primarily universities and museums. These publicly accessible collections of ancient and medieval art—largely assembled throughout the twentieth century, when many source countries barely acknowledged, let alone regulated, the trade—are now subject to intense scrutiny and the risk of reputational harm.

Ensuring that objects acquired long ago can still be considered to have “good” provenance has become an immense challenge for institutions that wish to adhere to the strict application of the Association of Art Museum Directors’ voluntary 2008 guidelines (revised in 2013). Those guidelines advised against acquiring objects imported into the United States after 1970 without documentation of lawful export from the country of origin, or absent other indicators of legal acquisition.¹⁹⁶

Yet for huge numbers of objects, records do not exist, often because they have not been kept for thirty, fifty or seventy years of circulation of the object, but mostly because, for most of the twentieth century, records of export from a foreign country were not required for import into the U.S. or Europe, and therefore not obtained in the first place.¹⁹⁷ Accusations of acquiring “looted” objects and even of unwittingly facilitating terrorism have pushed museums well beyond the AAMD standards—repatriating artworks acquired prior to 1970 and imposing provenance requirements on donations and acquisitions that demand documentation that, in many cases, never existed.

Educational institutions, where collections have long served as essential teaching tools in archaeology, anthropology, history, and the classics, now face demands to repatriate even common artifacts central to training future researchers.¹⁹⁸ Archaeologists and academics must also use caution when contributing to policy debates, as criticizing host government policies could jeopardize their ability to retain excavation permits.¹⁹⁹



A Jewish Yemenite Family Walking Through the Desert to a Reception Camp Near Aden, 1 November 1949, Severe anti-Jewish violence in MENA countries followed the announcement of the 1947 UN Partition Plan. About 49,000 Yemenite Jews were flown to Israel in a secret airlift program. National Photo Collection of Israel, public domain.

2. The Broader Public Cost: Collectors, Small Businesses, Diaspora Communities, and Museum Visitors

These pressures also reach into commerce, private collecting, and basic cultural engagement. Small businesses dealing in legally imported artworks find their inventory newly stigmatized, while collectors see longstanding property rights eroded under evolving interpretations of existing laws. Members of diaspora communities from countries demanding repatriations and embargoes may be cut off from their own cultural heritage by excessively broad U.S. cultural property agreements.²⁰⁰

Most significantly, the public—whose engagement with museums now underpins almost all art education and global historical understanding—encounters empty museum displays where familiar works once stood. The Antiquities Coalition has played a central role in driving this shift, amplifying unverified claims that have pushed repatriation policy beyond reform and into overreach.

3. The Trade Today: Greater Scrutiny, Regulation, and Due Diligence

The antiquities trade has been transformed over the past 25 years, with far greater scrutiny, regulation, and expectations for provenance and due diligence.²⁰¹ Claims linking lawful dealers to terrorism, drugs, and arms trafficking—driven by those opposed to private ownership of antiquities altogether—are unjustified by any evidence. Undermining the compliant trade is unproductive—with limited enforcement resources, the priority should be stopping newly looted material from entering the market—a form of regulation that the legitimate trade supports and implements its own protections against. Punitive regulations and restrictions on the trade in or ownership of antiquities threaten not only the market and established property rights, but also public education, by constraining and even shrinking university and museum collections. A new, evidence-based approach to cultural heritage protection is urgently needed, locally and globally.

4. An Extant, Stable Inventory of Antiquities

The legitimate antiquities market is largely supplied by millions of long-circulating objects, for which demand is far from insatiable. Today, lengthy, reliable ownership histories increase the value of antiquities significantly, while weak or unverifiable provenance makes objects unsaleable.

For roughly the last 150 years, Western museums have grown largely through gifts from private collections, for which proof of legal export was not required under U.S., European, or U.K. law until recent decades. Although the 1970 UNESCO Convention encouraged export controls, only European states implemented them consistently. Licensed export and partage arrangements, along with tacit official tolerance, sustained a significant trade into the late twentieth century. As a result, most objects, especially those with a long history in the market, lack clear original export documentation.

A practical issue is how to address “orphan” objects already in circulation with incomplete documentation, in order to enable their purchase or donation to museums. Clearer distinctions in enforcement of new documentation requirements between long-held material and newly looted items would improve transparency and reduce uncertainty. One possible approach is a reasonable cutoff date—such as around 2010, when documentation standards became more widely applied—to help regularize legacy material.

5. Stopping Looting Starts at Home

It is absurd to attribute persistent looting in countries such as Egypt or China primarily to demand from the international art market. Both states possess extensive security apparatuses and the capacity to control activity within their borders. Objects and monuments alike are far more at risk from neglect and environmental degradation than looting.

Looting is best understood as a domestic governance issue, where site protection can be achieved through enforcement of development and infrastructure regulations, not export controls. Regrettably, archaeological preservation is at the bottom of most regimes’ to-do lists.²⁰²

Egypt, for example, has invested over a billion dollars in its showcase Grand Egyptian Museum, yet fails to meet reasonable standards in areas such as site protection, storage, and funding for archaeological and conservation work.²⁰³ India’s government decries losses to heritage sites but has failed to budget for basic documentation of three-quarters of those sites, and has failed to provide security, conservation management and essential public amenities even at major UNESCO World Heritage sites.²⁰⁴ China maintains far stronger surveillance and law enforcement capabilities than any Western government, raising questions about how illicit digging can continue without local tolerance or corruption.²⁰⁵

6. Beyond Slogans - Evidence, Accountability, and Practical Reform

In the past decade, public perception has shifted sharply, recasting routine trade as colonial exploitation or theft. This narrative persists despite research documenting counter-narratives in many countries, including a history of licensed exports in Egypt until 1980,²⁰⁶ collegial relations between local scholars and Western archaeologists in China,²⁰⁷ revelations of how enterprising villagers capitalized on local archaeological resources in Turkey,²⁰⁸ and the complicity of military and government officials in taking objects from Cambodia.²⁰⁹ A more nuanced history has been eclipsed by a sweeping narrative that all antiquities are “stolen.”

The often-bitter debate over cultural heritage has resulted in some positive changes. Greater emphasis on provenance research has led to many objects’ histories being documented and preserved. Today, it is widely accepted that the art trade has an obligation to share historical information, rather than treating it as proprietary.²¹⁰



U.S. Air Force Boeing C-17 Globemaster III transporting 823 Afghan citizens, including 183 children, from Hamid Karzai International Airport, photo U.S. Air Force Air Mobility Command, Aug. 15, 2021, public domain.

But reform must be grounded in evidence and workable incentives. The focus should shift from hyperbole to facts—from slogans to durable, practical solutions. Looting is best prevented where it begins, on the ground, through investment in supervision, documentation, and preservation, and ideally, through successful voluntary systems such as the UK's Portable Antiquities Scheme²¹¹ and other workable legislation such as recent modifications to Scotland's Treasure Trove.²¹²

A global antiquities market has existed for centuries and millions of objects are in circulation, sufficient to meet legitimate global demand. Pretending that the clock can be turned back to an era before collecting and international exchange is neither realistic nor helpful. The better course is to reduce incentives for new looting, improve transparency where feasible, and address legacy collections fairly. Achieving those goals requires the active participation of collectors and the trade, whose cooperation and consultation is essential. The Antiquities Coalition's approach has too often made that cooperation more difficult, by treating all collectors and cultural institutions as inherently suspect, even criminal entities, and by building a groundless narrative linking the small market in antiquities to terrorism and organized crime. The central question is not whether looting exists or whether reforms are needed. It is whether policy has been driven by inaccurate claims and narratives that minimize the roles of poor governance, corruption, inadequate site protection, and weak enforcement in source countries.

In little more than a decade, the Antiquities Coalition has become one of the most influential voices in cultural property policy. To the extent its advocacy has relied on inflated estimates and emotionally compelling but weakly supported claims, it has helped shape policies that restrict collecting, scholarship, and museum access without demonstrating commensurate benefits. In so doing, it has advanced the political goals of numerous foreign governments, including authoritarian and illiberal regimes.

None of this proves misconduct. It does, however, warrant asking whether the Antiquities Coalition has at times misled policymakers and the public, potentially benefiting related for-profit interests while contributing to policies that carry significant cultural costs. An organization with such influence should be held to the same standards of transparency, evidentiary rigor, and accountability that it demands of others.



Ceramic wall tiles, Forbidden City, Beijing, China. Photo by Diego Delso, delso.photo, 19 February 2006, license CC BY-SA.

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