



CYRUS R. VANCE, JR.
DISTRICT ATTORNEY

DISTRICT ATTORNEY
COUNTY OF NEW YORK
ONE HOGAN PLACE
New York, N. Y. 10013
(212) 335-9000

May 29, 2019

The Honorable Dr. Khaled El-Enany,
Minister of Antiquities
3 el Adel Abou Bakar Street, Zamalek,
Cairo, Arab Republic of Egypt

Dear Dr. El-Enany,

In May 2018, this Office initiated a grand-jury investigation to determine whether the Gold Coffin of Nedjemankh (the "Gold Coffin"), on display at the Metropolitan Museum of Art ("the Met"), was illegally present in New York.¹ I subsequently informed representatives of the Government of the Arab Republic of Egypt that this Office had developed credible evidence that the Gold Coffin had been looted from Egypt, but that further investigation was required. Thereafter, and with your government's assistance, this Office proved that the Gold Coffin was looted from Egypt by members of an international antiquities-trafficking organization. On February 15, 2019, this Office seized the Gold Coffin pursuant to a judicially authorized warrant.

Laws pertaining to grand-jury secrecy preclude me from sharing the full extent of the investigation or grand-jury proceedings. Pursuant to an Order of the New York County Supreme Court, however, I am authorized to share with you a summary of the results of our investigation. Moreover, because members of this Office conducted interviews and analyzed evidence outside of the grand-jury process, I may lawfully share much of the substance of the investigation. I do so largely because of the strong public interest in the transparency of the criminal-justice process. It is, after all, an axiom of jurisprudence "that justice should not only be done, but should manifestly and undoubtedly be seen to be done." *R v Sussex Justices, ex parte McCarthy*, 1 KB 256 (1924). Such limited disclosure is also offered to help clarify the factors that may be probative in determining whether an antiquity constitutes stolen property under New York State criminal law.

Finally, because this investigation uncovered criminality in multiple jurisdictions, I respectfully submit that it is incumbent on this Office to share a summary of the results of the investigation with our international partners so they may act pursuant to their official duties in their respective jurisdictions. What follows, then, is a summary of the legal background applicable to the investigation and prosecution of all antiquities cases in New York County generally and a summary of the results of this investigation.

¹ Grand-jury investigations generally rely on information received from subpoenas, search warrants, consent searches, witness interviews, and judicious use of confidential informants.

Legal Background

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

First, under the penal law, an “owner” is defined as “any person who has a right to possession thereof superior to that of the taker.” Penal Law §155.00(5). Additionally, and unique to antiquities, whenever the country of origin has a clear pronouncement of patrimony—i.e., a legal declaration of national ownership of cultural heritage found after the enactment of that law—then that country would be the “owner.” In such cases, “it does not matter that the antiquities...were stolen in a foreign country, or that their putative owner is a foreign entity.” *U.S. v. Frederick Schultz*, 333 F.3d 393, 402-03 (2nd Cir. 2003). After all, there is “no reason that property stolen from a foreign sovereign should be treated any differently from property stolen from a foreign museum or private home.” *Id.* at 410.

Second, it is a bedrock of New York State criminal law that “once stolen, always stolen.” A thief, therefore, can never lawfully acquire good title in New York or pass on good title to anyone else. Thus, although a good-faith purchaser may lack the necessary intent and therefore not be criminally liable for possession of the stolen property, such a good-faith purchase does not launder the piece. In other words, the fact that the purchase was made in good-faith does not transform a stolen antiquity into a lawful one. “Good faith” may shield a possessor from prosecution, but cannot shield an antiquity from seizure. Thus, once an antiquity is proven to have been stolen—regardless of when or where—it can be legally seized and returned to the last lawful owner.

Finally, under New York State law it does not matter how much time has elapsed since the initial theft. Generally, a criminal action for a felony involving stolen property must commence within five years from the date of the crime. Criminal Procedure Law §30.10. The crime of criminal possession of stolen property, however, constitutes what the law refers to as a “continuing crime,” continuing as long as the stolen object is being possessed by anyone other than the lawful owner. For the crime of criminal possession of stolen property, therefore, the five-year clock under the statute of limitations does not begin running until the stolen property is no longer being possessed—be it by seizure, sale, or transfer. Thus, provided a piece has been possessed in New York County within the last five years and there is sufficient evidence that proves the property is stolen, this Office may seize such property and prosecute culpable

offenders. And we may do so regardless of whether the theft itself lies outside the applicable statute of limitations.²

These protections are neither new nor unique to antiquities. New York State law has always, “protected the right of the owner whose property has been stolen to recover that property, even if it’s in the possession of a good-faith purchaser for value.” *Solomon R. Guggenheim Foundation v. Lubell*, 77 N.Y. 2d 311, 317 (1991). In this context, the ultimate question, then, is whether the Gold Coffin constitutes stolen property under New York State criminal law.

The ability to proceed with any investigation or subsequent prosecution, however, is dependent on demonstrable evidence—which, in turn, depends on the circumstances of the theft. Generally, thefts involving stolen antiquities fall into one of two broad categories: those of documented and of undocumented antiquities.

The first broad category would be thefts of documented antiquities. Such cases ordinarily include thefts of antiquities previously recorded or photographed from, for example, museums, private collections, or other institutions. Such cases may also include thefts of antiquities previously discovered during authorized and documented archaeological excavations—including excavated pieces that are not yet removed from the site. For such “documented” cases, direct evidence may include, but is not limited to, witness observations, museum or collection records, and pre-theft photographs of the object *in situ*.

It is important to note that in cases involving the theft of a documented antiquity, the effective date of any patrimony law in the country of origin has no bearing on whether an antiquity constitutes stolen property under New York State criminal law. In other words, and despite what is commonly believed by some in the antiquities-collecting community, simply because an antiquity has a documented provenance that pre-dates the enactment of the applicable patrimony law does not necessarily mean the piece is lawful. After all, the enactment of a country’s patrimony law does not immunize from prosecution thefts that occurred prior to that date. Thus, an antiquity may be proven to constitute stolen property regardless of whether its theft occurred before or after the enactment of any applicable patrimony law.

The second broad category would be thefts of undocumented antiquities. Such cases ordinarily include thefts of antiquities clandestinely looted. For thefts of undocumented antiquities, therefore, direct evidence such as records and photographs rarely exist. The law, however, does not require direct evidence of the precise timing and location of a theft to prove an object constitutes stolen property. To prove a suspected crime, investigations and prosecutions may also rely on circumstantial evidence. Indeed, New York State criminal law draws no distinction between the weight or importance of direct versus circumstantial evidence in proving a crime.

² The defense of laches, i.e., that a long delay in asserting the right or claim has prejudiced the adverse party, is often raised in civil cases. This defense, however, does not apply in a criminal case. *See, e.g., U.S. v. Batson*, 608 F.3d 630, 633 (9th Cir. 2010) (“Like the Second Circuit, [w]e have found no case applying a laches defense in the criminal context.”) *quoting U.S. v. Milstein*, 401 F.3d 53, 63 n.3 (2d Cir. 2005).

Circumstantial evidence in the case of suspected looted antiquities may include, but is not limited to, the sudden appearance of an object on the market after a source country has been looted of that specific type of object, the first documented photograph of the object depicting it in a dirty or broken state, the existence of inconsistent or demonstrably false provenance for the object, or that the first documented possessor of the object is a smuggler or trafficker of stolen antiquities. Standing alone, any one of these facts may not be sufficient to warrant criminal prosecution. But, when taken together with other evidence, and what may reasonably be inferred from the evidence, such facts are always material, usually probative, and often dispositive.

Finally, and regardless of whether the theft was of a documented or undocumented antiquity, the manner of its exportation is also relevant. This is because, under U.S. law, “illegal exportation constitutes a sufficient act of conversion to be deemed a theft.” *U.S. v. McClain*, 545 F.2d 988, 1003 (5th Cir. 1977). This act of theft, coupled with “a declaration of national ownership suffices to render an illegally exported item ‘stolen.’” *Id.* at 1001. In other words, if an antiquity is removed from its country of origin after the effective date of that country’s applicable patrimony law, and such removal is in violation of that country’s exportation laws, then the wrongfully exported antiquity constitutes “stolen property.” Thus, although the crime of wrongful exportation from the country of origin does not constitute a separate crime under our law, such wrongful exportation does render the antiquity “stolen property” under New York State Penal Law §155.00 et seq.

As addressed below, the evidence obtained during this investigation proves the Gold Coffin was looted in Egypt in or around 2011, illegally smuggled out of the country, subsequently supplied with a forged export license and false provenance, and laundered by an international antiquities-trafficking ring. As such, the Gold Coffin constitutes stolen property under New York State criminal law, and must be returned to its lawful owner, the Government of the Arab Republic of Egypt.

Factual Background

The Gold Coffin was crafted in Egypt during the Late Ptolemaic to early Roman period (approximately 150-50 B.C.E), and once held the remains of Nedjemankh, a high-ranking priest. Made from cartonnage (plastered linen) and approximately 71.3 inches long, Nedjemankh’s coffin was fully gilded and inscribed with protective symbols and hieroglyphics symbolizing his journey into the afterlife. The inscriptions are characteristic of a priest of the ram-god Heryshef from Herakleopolis, an ancient cult site approximately 100 miles south of Cairo. In accordance with Egyptian funerary tradition of the period, the Gold Coffin and its mummy would have been placed in a sealed tomb, either within a burial niche or a sarcophagus.³ It is unknown where in Egypt the Gold Coffin was originally buried. But

³ To be precise, a coffin is the funerary container closest to the body of the deceased. A sarcophagus refers to the outer shell for a coffin, and is usually made from stone or wood.

wherever it was buried, it remained undisturbed for over two-thousand years until it was looted from the Minya region of Egypt in or around October of 2011.

Initial Investigation

In 2013, this Office began an investigation into the activities of an international antiquities-trafficking ring known to transport stolen and looted artifacts to New York County, among other destinations. During this investigation, this Office seized material connected to the Germany-based antiquities dealers Roben Galel Dib and Serop Simonian.⁴ Both Dib and Serop Simonian have previously been the subject of criminal investigations in multiple countries resulting in the seizure of hundreds of pieces of stolen cultural property. The material this Office obtained consisted of thousands of images and videos—many of which depicted dirty or damaged antiquities. This material included six images of an object that this Office later determined to be the Gold Coffin.⁵ The material also included hundreds of emails to or from Dib, Serop Simonian, Paris-based dealer Christophe Kunicki, and looters and smugglers in the Middle East.

Through analyzing this material, this Office identified the general structure and operation of this antiquities-trafficking ring. First, local thieves would loot artifacts and photograph the pieces immediately or shortly after looting them. The use of locally based looters, who often possess knowledge of, and access to, archaeological sites, is consistent with the well-documented practice of several antiquities-trafficking networks. In the seized material, antiquities often appear scattered on the ground or wrapped in newspapers on the floors of makeshift storage areas. Within both the law-enforcement and archaeological communities, it is well-known that photographs and videos of dirty or damaged antiquities in such locations are clear indicators of recent looting.

Based on this material, it seems that the thieves generally next emailed photographs of dirty and damaged antiquities to Dib and Simonian. It is, again, well-known within both the law-enforcement and archaeological communities that local thieves often send such images to potential buyers—usually based abroad—to assess interest prior to incurring the risks attendant to smuggling the antiquities out of the country of origin and across international borders. It is, further, well-known that thieves use photographs of an antiquity in its dirty or damaged state to signal its authenticity to potential buyers. In short: if it is looted, it is real.

After receiving the material, Dib appears to have generally consulted Kunicki in deciding whether to purchase an object. In several emails, Dib questioned Kunicki and other dealers and experts about potential acquisitions—often seeking to verify whether an antiquity was authentic and valuable. Once Dib agreed to buy a stolen antiquity, the piece was then smuggled

⁴ Two Simonian brothers are named in this investigative summary: Serop and Simon Simonian. Both are involved in the theft and trafficking of the Gold Coffin.

⁵ At the time of seizure of the emails and photographs, there was nothing that distinguished the coffin in the photographs from the hundreds of other dirty and damaged antiquities—let alone indicated it would one day arrive in New York County.

out of their country of origin. The seized material in this investigation contains evidence that Dib wired money to the local smugglers and traffickers in exchange for transporting the antiquities to Germany—often through Dubai.

Once an antiquity was out of the country of origin, Dib then arranged for it to be cleaned and restored. In emails and chat transcripts, Dib frequently compared the methods for cleaning dirt off antiquities—critical tradecraft in the illicit antiquities market. Additional emails among the seized material show that Dib generally kept Kunicki and other dealers apprised of the cleaning and restoration process.

Next, Dib created false provenances and ownership histories to sell the objects on the international art market. Typically, Dib claimed the antiquities had been sold by Egyptian exporters to German collectors or to the Simonian family. To bolster this claim, Dib appears to have also used forged documents. The seized material contains, for example, a blank 1970's invoice from Egyptian exporter "Frag Abdel Rahim el Chaer" (Antiquities Dealer License No. 116) that Dib appears to have used (and re-used) to support the false prior ownership and sales histories.

Ultimately, Dib then sold newly laundered antiquities through Kunicki or the Paris-based auction house where Kunicki worked, Pierre Bergé & Associates. This modus operandi describes precisely how the looted Gold Coffin left Egypt and arrived in New York

The Gold Coffin's Looting and Illegal Export

The Gold Coffin's first known documented appearance is in six photographs attached to three emails sent to Dib in December 2011 and January 2012. The first email was sent by one of the looters to an intermediary third party on December 8, 2011, who then forwarded the email to Dib later that same day. That email contained a single photograph of the Gold Coffin. On January 6, 2012, the third party again forwarded that same email to Dib. The third email was sent on January 9, 2012, from the same looter to the same third party, and again forwarded to Dib later that same day. This third email contained five additional photographs of the Gold Coffin—making it a total of six photographs that Dib received from the looter. Because all three emails were forwarded by the intermediary third party directly to Dib, he (Dib) received the entire email chain, including the content of the prior emails between the looters.

This Office analyzed the metadata (contextual information and properties of a digital file) of the six photos of the Gold Coffin attached in these emails. According to the metadata of the six photographs, three photographs were taken on October 23, 2011, and three were taken on November 8, 2011. All photographs are crudely taken in poor lighting conditions. In four of the six photographs, the dirt-encrusted and damaged Gold Coffin is depicted lying on a blanket. In one of those four photographs, the feet of the individual taking the photograph are visible. In one of the three October photographs, the Gold Coffin and blanket are resting on gravel. The piece appears to have been moved after this photo, because in two of the November photographs, the Gold Coffin is on the same blanket, but now on a tile floor. In

each of the six photographs, the Gold Coffin's surface is damaged and covered in dirt or sand. Such photographs—depicting an antiquity in a dirty or damaged state and being stored in such conditions—are the hallmark of a recently looted antiquity. *See* Attachment 1 for one of the November 8, 2011, photographs.

This Office also analyzed the metadata of the emails themselves. This Office extracted the Internet Protocol (IP) address of the January 9, 2012, email from the looter that had been forwarded to Dib with six photographs of the Gold Coffin. Because it is a numerical identifier assigned to each device that connects to a computer network, an IP address can be used to locate a device through extracting the location associated with a data transfer. The original email was sent on January 9, 2012, from one of the looters to a third-party. That original email was sent from a device that used an IP address in Egypt. In other words, the photographs that were taken in October and November of 2011 were then attached to an email that was sent from Egypt in January of 2012. Based on the digital evidence alone, therefore, it is clear the Gold Coffin was in Egypt in its dirty and damaged state in 2011 when the photographs were taken. Apart from this analysis, however, the fact that the Gold Coffin was looted in Egypt in 2011 and thereafter illegally exported has also been corroborated by at least one other source. In sum, the Gold Coffin was incontrovertibly in Egypt when it was looted and subsequently photographed in 2011.

Although the December and January emails were sent to Dib only—and not to Kunicki—there is evidence that Kunicki was also in possession of the exact same photographs of the dirty and damaged Gold Coffin taken by the looters. In February 2019, the Met notified Kunicki that the Gold Coffin had been seized by this Office because it had been illegally smuggled out of Egypt after 2011. To refute this allegation, Kunicki's lawyer sent the Met on May 17, 2019, "photographs that, according to our client's source, were date stamped in 2005-2006 when, I have been advised, that the Coffin was restored in Germany." In fact, the material provided by Kunicki's lawyer were ten cropped scans of five of the exact six photographs that had been sent to Dib by the looters, and taken in October and November 2011. The one photograph that was not included in the scanned material was the one that depicted the Gold Coffin on gravel.⁶

This investigation has also determined that when the Gold Coffin was looted in Egypt just before the photographs were taken, the mummy was still inside. The looters opened the coffin by cutting along the original seams between the lid and the base, and then disposed of the mummy. Further corroborating this account, when the Gold Coffin arrived in New York, the Met's conservation team discovered a phalanx (finger bone) still attached to the interior of the Gold Coffin. Additionally, the interior still contained resin and linen fragments left over from the mummy's embalming, with the impression of two lower leg bones—a tibia and a fibula—visible in the resin.

⁶ There is additional evidence that the photographs provided by Kunicki's lawyer had been doctored and could not have been "date stamped in 2005-2006" as claimed by John Zulack, Kunicki's lawyer. All six photographs were taken on a Nokia N73 smartphone. But the N73 was not released commercially until August 2006.

After Dib received the photographs, the coffin was smuggled out of Egypt in 2012. The name of the individual who smuggled the Gold Coffin is known to this Office, and will be provided separately to multiple foreign law-enforcement agencies in France, Germany, and Egypt. The Gold Coffin was then sent to the Dubai harbor in a shipping container. Soon after its arrival in Dubai, the piece was moved to a warehouse in the United Arab Emirates.

The next documented mention of the Gold Coffin occurs in a September 14, 2012, Gmail chat between Dib and Serop Simonian. Throughout this and subsequent exchanges, Dib and Simonian—who communicated in Arabic, English, and German—generally referred to the Gold Coffin as the “yellow.”⁷ In this chat, Serop Simonian asked, “when is the big yellow one going to get here.” Dib replied: “early October it will be ready for the EU.”⁸ But the piece does not appear to have been shipped to Europe until several months later.

On February 4, 2013, Dib emailed Sharjah-based trader Hassan Fazeli with the subject: “the invoice for the yellow.” This email included an attachment entitled, “Yellow.pdf.” The document itself had the heading, “proforma-invoice for customs,” and was addressed to Heribert Wuttke in Rheinbach, Germany. In the body of the invoice, Dib had written, “you receive on approval: A Greek-Roman sarcophagus in two parts, lid and box. Gypsum. 5000.00 Euro.” The sections labeled “Stamp” and “Signature” were left blank. On February 6, 2013, Dib sent Fazeli an email titled “yellow again.” Later that same day at 6:00 AM, Fazeli replied to the email with a scan of the earlier invoice, now on the letterhead from the “Hassan Fazel Trading Company LLC,” and signed, stamped, and dated “02/Feb/2013.”

On February 6, 2012 at 6:12 AM, Dib sent Fazeli an email titled “the right one” which contained a revised pro-forma invoice as an attachment named “yell2.doc.” The contents of the document are identical to the previous “proforma-invoice”, except the earlier “you receive on approval” now reads “you receive on approval and examination.” Approximately an hour later, at 7:15 AM, Fazeli emailed Dib a signed, stamped, and dated copy of this new invoice, again on letterhead from the “Hassan Fazel Trading Company LLC.” One minute later, Dib replied to Fazeli’s email, “This is good. Thank you.” In other words, Dib supplied Fazeli with the contents of the false invoice, then Fazeli adopted those details and fabricated an invoice for Dib.

Apart from these emails, chats, and photographs, there is no record of the Gold Coffin’s existence. There is no official record of an export visa or stamp ever having been issued authorizing the Gold Coffin’s removal from Egypt at any time. Nor are there any shipping, storage, customs, or insurance records of any kind documenting when and how the Gold Coffin left Egypt, or when and how it arrived in the United Arab Emirates.

⁷ The piece was variously referred to in emails, chats, and other communication as “asfar” (Arabic for yellow), “yellow,” “yell,” and “big yellow one.”

⁸ The quoted Gmail chat is in German. All material in foreign languages has been translated into English.

On February 7, 2013, Fazeli emailed Dib a photograph of a FedEx International Air Waybill that Fazeli had prepared to ship the Gold Coffin from the United Arab Emirates. Addressing the Waybill to Heribert Wuttke in Rheinbach, Germany, Fazeli falsely listed the “Commodity Description” as “[a] gypsum Wooden Box and lid,” providing its “Value for Customs” as 5000 euros, and its “Country of Manufacture” as Turkey. None of this information accurately described the multi-million-dollar gilded cartonnage coffin from Egypt. It is well-documented that misrepresenting contents, values, and countries of origin on customs documents are often a forensic counter-measure used to avoid law-enforcement scrutiny at the borders.

Fazeli’s invoice itself is similarly inaccurate, describing the Egyptian coffin made from gilded cartonnage as a Greek-Roman sarcophagus made from gypsum. Notably, by describing the Gold Coffin as “Greek-Roman,” Fazeli would have made the Coffin’s origin—and legality—more difficult to trace. After all, an object of Greco-Roman style could have originated within the borders of many modern nations, while an Egyptian coffin could have originated from only one.

On February 19, 2013, Dib emailed the same individual who had first sent the original photographs a year earlier. Dib’s email, with the subject line “asfar” (Arabic for yellow), contained five photographs of the subject Gold Coffin. Each photograph depicts the Gold Coffin in a shipping crate surrounded by yellow packing material. The date of this email, and the partial restoration of the Gold Coffin in the photographs, suggests the photographs were taken after the Gold Coffin arrived in Germany. It seems that Dib—who had not yet paid for the Gold Coffin—sent the photographs to the looter as a measure of good faith to indicate that the Gold Coffin was on its way to being sold. In other words: the money would be forthcoming. And then, for the next several years, the Gold Coffin went dark; there is no known record of its whereabouts.

Its next documented appearance was on May 17, 2016. On that date, Kunicki’s partner, Richard Semper, emailed Dr. Diana Patch, the Curator in Charge of the Department of Egyptian Art at the Met. Semper wrote, “[h]ope this e-mail will find you well. I would like to have a phone call with you about a hard piece I have for sale.” According to records received from the Met, whenever the museum had purchased antiquities from Kunicki in the past, such transactions were done through the auction house Pierre Bergé. On this occasion, however, Kunicki and Semper offered the Gold Coffin directly to Patch over the telephone. They informed her that the asking price was 4.5 million euros.

The following morning, May 18, 2016, Kunicki emailed Patch that, “[i]t was a pleasure speaking to you. Below a link to download the file with photos.” Four hours later, Patch replied in an email, “[t]hank you for sharing the information on the object today. I successfully downloaded the photographs and deleted the email.” According to Patch, she deleted the email because Kunicki had requested on the telephone that she handle everything “confidentially” before he sent her the Dropbox link to the photographs. Although the Dropbox folder itself has been deleted, Patch appears to have downloaded 33 professional-quality photographs of the Gold Coffin. According to their metadata, the photographs were

taken on September 21, 2015, by Stephane Briolant, a Paris-based photographer, using a Canon EOS-1D X.

By September 2015, therefore, the Gold Coffin was in Paris. But how and when it left Germany or arrived in Paris is unknown, because there is no official record of the Gold Coffin after it was last documented in Germany in 2013. Given the lack of border control in the Schengen Area—a group of 26 European nations that share open borders—the absence of any customs documents is not surprising. But there are also no shipping, storage, or insurance records documenting the Gold Coffin’s transit from Germany to France or documenting how or from whom Kunicki came to possess the Gold Coffin.

Following the May 18, 2016, email exchange between Patch and Kunicki, there is no other known documented communication between Patch and either Kunicki or Semper until September 1, 2016, when Kunicki and Semper jointly emailed Patch,⁹ “[w]e hope you had a nice Summer. We are coming back to you about the photos we sent. Can you please tell us if the work is of interest for you? If yes, are you planning to be in Paris soon?” The email closed, “[b]est regards. Christophe, Richard.” Patch replied on September 8, 2016, to “Dear Richard and Christophe” that “I have been considering the object all summer. I am still waiting for one last piece of information from my director.” On September 14, 2016, Patch emailed the pair again: “I am still in conversation with the Director. He asked what the time table was for an answer about our interest.” Minutes later, Kunicki replied that “[w]e do not have a dead line for your reply, but as I said this piece is not on the market. You are the first and only one to know about it. I cannot wait too long.” Again within minutes, Patch replied that “I will let you know when you get back at beginning of October. Would that work? It is a great deal of money.” Shortly after, Richard replied, “Regarding price, I will be direct with you. If you confirm your interest, I will be able to improve.”

Patch appears to have spoken to the pair later that day, because the following morning, she emailed “Christophe and Richard,” thanking them “for that additional piece of information. We are still in discussion with the Administration.” That new information appears to have been that the Gold Coffin was from Herakleopolis. In the same September 15, 2016, email, Patch continued by assuring Kunicki and Semper that her “curatorial staff and the director...all know that this is not for any open discussion outside of me and any research will be conducted only among ourselves.” There are no extant emails indicating that Patch or anyone at the Met was asked by Semper or Patch to maintain such secrecy in researching the Gold Coffin. If there was such a request, therefore, it can only have been made during the telephone call on September 14. There is also no indication that Patch or anyone else at the Met questioned the necessity for the secrecy or drew any adverse inferences from the request.

⁹ As confirmed by multiple sources, both Kunicki and Semper used the same email account interchangeably. Indeed, emails from this account are often co-signed by the pair. Where an email is signed by both Kunicki and Semper, the email is attributed herein to both. Where the email is signed by one of them, it is attributed herein to the single signer. Finally, where it is unsigned, it is attributed herein to the last identified signatory in the email chain.

Over the next two months, Patch remained in contact with Kunicki and Semper—primarily concerning price and arranging for Patch to view the Gold Coffin in Paris. That viewing took place on December 9, 2016, when Patch visited Kunicki and Semper in Paris. She met them at their home and then accompanied them to the warehouse where she photographed the Gold Coffin. According to the metadata of the photographs, Patch took at least 107 photographs of the Gold Coffin at the warehouse, between 3:33 and 4:25 p.m. on December 9, 2016. Only 92 of the photographs are extant, however, because Patch appears to have deleted 15 of the photographs.

The Gold Coffin's Sale to the Met

Following Patch's visit in December 2016, the Met began additional research into the provenance and authenticity of the piece in order to formally present the piece to the Met Board for acquisition. During this process, the Met repeatedly requested various documents from Semper and Kunicki for the Gold Coffin.

The Met had first requested information about the Gold Coffin's documentation months earlier in the September 15, 2016, email referred to above in which Patch had thanked Kunicki and Semper for the "additional piece of information" that the Gold Coffin was from Herakleopolis. Patch then wrote, "[c]an you share the export papers?" Kunicki emailed her hours later: "Attached, you will find the export document (Export licence 1145 dated 11 May 1971). There is a French legal translation ... I have to apologise to hyde (sic) the name of exporter. You will have it later with additional informations if you decide to go ahead." The attachment, titled "Provenance – copie," consisted of four pages: what purports to be the Gold Coffin's export license from Egypt (scanned in two pages because of its size) and its translation into French (also in two pages).

As Kunicki wrote, the French translation was redacted, "hiding" the name of the exporter. But the name of the exporter on the Egyptian export license itself was not redacted. It listed, in Arabic, the name of prior owner and exporter of the Gold Coffin as Simon Simonian, and his license number as 86. According to the Arabic version of the export license provided by Kunicki and Semper to the Met, Simonian acquired the Gold Coffin from the heirs of Egyptian dealer Habib Tawadros and then sold it to a "Mme. Chatz" in Switzerland. Although the Egyptian export license is dated May 11, 1971, the French translation of the license purports to have been made on March 30, 2016, by Paris-based translator Brahim Hassine.¹⁰

The next documented communication regarding the Gold Coffin's export from Egypt occurred on December 21, 2016, between the Met and the Egyptian government. Despite Patch's earlier assurance in September that "any research will be conducted only among ourselves," Patch instructed Dr. Janice Kamrin, Associate Curator of Egyptian Art at the Met,

¹⁰ Brahim Hassine is an Arabic translator registered with the Paris Court of Appeals. There is no independent record that Hassine ever received a copy of the Egyptian export license for translation—nor if he himself executed any translation.

to contact Egyptian officials about the Gold Coffin. Kamrin's email, titled "Due diligence" on December 21, 2016, appears to be the first external research conducted by anyone at the Met into the Gold Coffin. On that date, Kamrin emailed Egyptian official Yasmin El Shazly, and asked her whom the Met might contact in the Egyptian government to verify the Gold Coffin's export license. El Shazly referred Kamrin to Shaaban Abdel Gawad, the Head of the Repatriation Department. Kamrin then emailed Abdel Gawad on December 22, 2016:

[W]e are looking at the possibility of acquiring an object that left Egypt in 1971. The material that has been provided to us looks right to us -- an export permit with all the proper stamps and the number of the related tax document. However, as part of our due diligence, we would like to confirm this with the ministry, and ideally check the copy of the export permit we have been shown against the ministry's copy. What would you need from us to move forward with this?

Kamrin did not attach to her email a copy of the export license the Met had received from Kunicki in September. Not receiving a response, Kamrin emailed Abdel Gawad again, on December 28, 2016. Still receiving no response, Kamrin emailed El Shazly two more times about the export license (December 29, 2016, and January 2, 2017) asking El Shazly to contact Abdel Gawad for her.

In sum, Kamrin emailed Abdel Gawad and El Shazly twice each (for a total of four requests) concerning the export license. On January 2, 2017, El Shazly replied in an email to Kamrin to "[p]lease send me all the data and pics and I will show everything to [Abdel Gawad]." Kamrin wrote back that same day, asking, "[i]f we send the year and the number of the permit, does that give [Abdel Gawad] enough to work with?" Apparently, it did not give Abdel Gawad enough to work with, because El Shazly emailed Kamrin back and asked her to send him a copy of the export license that Kamrin had claimed "looks right to us." Kamrin did not respond immediately. But three days later, on January 5, 2017, she wrote,

Sorry for the delay - I had to check in with our counsel's office to get the relevant information. I actually only have access to the date and the number of the export permit - I don't have any copies, electronic or otherwise, of any images. And at this point, we really only want to confirm that the export permit is genuine - again, it certainly looks right, but it would be nice to confirm this against the ministry's copy.

Since Patch had received the export license from Kunicki and Semper on September 15, 2016, it is unclear why Kamrin—who worked for Patch—told Egyptian officials around three months later, on January 5, 2017, that she did not "have any copies, electronic or otherwise," of the export license. On the other hand, if Kamrin did not "have any copies, electronic or otherwise," of the export license on January 5, 2017, it is similarly unclear how she could have claimed in her December 22, 2016, email to Abdel Gawad that "[t]he material that has been provided to us looks right to us -- an export permit with all the proper stamps and the number of the related tax document."

In other words, either the Met had a copy of the export license and Kamrin accurately reported that it “looks right to us,” or the Met did not have a copy and Kamrin accurately reported that the Met did not “have any copies, electronic or otherwise,” of the export license. It is difficult to understand how both could have been accurate. Regardless, there is no indication or extant documentation that either El Shazly or Abdel Gawad replied to Kamrin’s last email.

Several weeks after Kamrin’s last email, Patch appears to have spoken to either Kunicki or Semper on the telephone about the Gold Coffin’s export license. Because, on January 25, 2017, Semper emailed Patch: “Dear Diana, As per our phone call, you will find attached export, as well as the translation done by the German Embassy in Cairo in 1977. If you also want to use it, delete name.” Semper did not explain (in writing, at least) why he wanted Patch to “delete name.” But neither is there any record that Patch asked. Attached to Semper’s January 25, 2017, email were two documents: first, another copy of the Gold Coffin’s export license from Egypt (scanned in color this time and in two pages because of its size); and second, a German translation of the export license (in three pages).

Although this January 25, 2017, version of the Egyptian export license appears to be the same as the one Semper and Kunicki emailed Patch months earlier, there are several notable differences. First, although still dated May 11, 1971, this color version of the Egyptian export license is missing what purports to be the French translator’s stamp that had appeared on the first version of the export license that Semper and Kunicki had sent to the Met. Second, and unlike in the first version, the name Simon Simonian is now redacted on this export license. As for the German translation that accompanied the license, it purports to have been executed at the West German Embassy to Egypt in Cairo on February 25, 1977.

A week later, on February 2, 2017, Patch emailed Kunicki and Semper that,

I am happy to say that the museum has decided to pursue this acquisition with the Board at The Met. In order to do that I need to bring the coffin to the U.S. and present to the Director and the Board. Given the process (first of two meetings is Feb. 22 but the critical one is March 13), we need to move forward now. Can you confirm that everyone is willing to proceed with this sale? We of course will require the original export license, original 1977 German translation, and your warranty if the sale is approved by The Met. Also please confirm the price.

Fifteen minutes later, Kunicki and Semper replied,

That is a good news. Just a little problem. I will not be able to give you original original (sic) export and German original translation, just because they lost it.

To overcome this “little problem,” however, Kunicki and Semper offered to, “forward to you the original notarial attestation of Simon Simonian.” Patch immediately replied that this “may be present us with a problem.” Later that same night, Patch wrote another email,

We are very surprised to learn that you (or the current owner) do not have the originals of the two critical documents for the history of the coffin.

Presumably, the “two critical documents for the history of the coffin” were the original export license and the 1977 German translation. Patch then asked them to “[p]lease send a scan of the original attestation of the first owner outside of Egypt and we will review its contents.”

On the next day, February 3, 2017, Kunicki and Semper emailed Patch a copy of a letter from “Simon Simonian” in which Simonian claimed,

I exported officially from Egypt a gilded sarcophagus, Late Period, inscribed with the name of Nedjemankh, approximately 170 cm high, from the ancient collection of Habib Tawadros. Export licence 1145, dated 11 May 1971.

Simonian’s letter is dated April 5, 2016. In addition to the letter, Kunicki and Semper included a single-page boilerplate form that appears to have been downloaded from www.NationalNotary.org, titled, “California All-Purpose Acknowledgement” and allegedly signed by “Nobuo Hirako, Notary Public.”¹¹ The attachment appears to have been intended to convey to the Met that “Simon O. Simonian” signed the April letter and, therefore, that the declared ownership was authentic.

There are, however, two notable discrepancies. First, the “Acknowledgement” is dated December 3, 2016. Yet, the letter is dated April 5, 2016. It is unclear how Hirako witnessed a signature on a document from eight months earlier. Second, generally a notary’s certification appears on the same page as the signature it is notarizing. This practice is crucially designed to prevent abuse. Here, however, Hirako’s certification and notary stamp are on a separate piece of paper from Simonian’s letter. This does not preclude the possibility, therefore, that the Acknowledgement was prepared for another document or purpose and later affixed to the letter. Hirako’s Acknowledgement did include a section labeled, “Description of Attached Document.” If filled out, this section would serve the same purpose of connecting the notary’s certification to the specific document being certified—and only that specific document. This section on the document, however, was left blank. There is, therefore, no way of corroborating that the Acknowledgment provided to the Met was prepared for, and attached to, Simonian’s signature on the April 2016 letter. There is no indication that Patch, or anyone else at the Met, questioned these discrepancies.

The Gold Coffin’s Forged Export License(s)

More redolent of the Gold Coffin’s illegality than any of these issues, however, were the two versions of the forged Egyptian export license (and their two translations) provided by Kunicki

¹¹ Nobuo Hirako is a certified public notary based in California whose commission number of “#2003610 is accurately recorded on the “Acknowledgement.” There is no independent corroboration that Hirako himself ever saw the letter to which his notarization purportedly referred.

and Semper to the Met. The documents are demonstrably false on their face. Three of the salient indicators are listed here.

First, both the color and black-and-white versions of the Egyptian export license provided to the Met by Kunicki and Semper have a stamp purportedly from the Egyptian government affixed at the top and bottom. Doubtless used to legitimize the document, this stamp is incontrovertible evidence that the license was forged. At the top of the purple and blue stamp are the words “A.R. Egypt,” followed by the Arabic words for “the Arab Republic of Egypt.” The export license is dated May 11, 1971. But on that date, however, the “Arab Republic of Egypt” did not exist. From February 1958 to September 10, 1971, Egypt was known as the United Arab Republic. Any stamps issued by the Egyptian Government prior to September 11, 1971, therefore, read “U.A.R.,” followed by the Arabic words for “the United Arab Republic.” In other words, an accurate license from May 11, 1971, would have imprinted “U.A.R.” not “A.R. Egypt.” When the export license for the Gold Coffin was forged for the Met, therefore, the forgers simply forgot (or never knew) that fact. Or they never expected anyone to check.

Second, both the color and black-and-white versions of the Egyptian export license provided to the Met by Kunicki and Semper contain two conflicting dates on the face of the license itself. Toward the middle of the license, the date “71/5/11” (May 11, 1971) is written (in red ink on the color copy). At the bottom of the license, immediately to the right of the seal, however, is the date 5/11/1961—the numbers “196” are pre-printed in black on the license and are followed by a handwritten “1” in blue. Licenses issued by the Egyptian Government—like those of any country—have a single date. A legitimate license, therefore, would have only listed one date. That date would have been 1961 or 1971, but not both 1961 and 1971.

These multiple and conflicting dates do, however, offer insight into the forgers’ process. The German translation that Kunicki and Semper had emailed to Patch contained a single date (1961). But the French translation that Kunicki and Semper had emailed to Patch contained both dates: 1961 in black at the bottom of the license and 1971 written in red in the middle of the license. The only reasonable inference, therefore, is that when the forgers gave the German translator the export license it had only one date (1961). But then they added a second date—the one in red in the middle—before they gave it to the French translator.

Finally, the Egyptian export license provided to the Met by Kunicki and Semper is missing a necessary signature. The license contains a section for the signatures of three individuals: a curator of the Egyptian Museum, a board member of the museum, and the Director-General of the Antiquities Authority. The first two sections—for a board member and curator—have signatures. The line for the Director General’s signature, however, is blank. *See* Attachment 2 for the color version of the export license.

As with the earlier irregularities with the purportedly notarized letter, there is no indication that Patch, or anyone else at the Met, noticed or questioned any of these discrepancies in the export license.

Ultimately, that the license was forged helps explain Kunicki and Semper's conflicting accounts about the status of the original export license and their reluctance (or inability) to locate the "original." On February 2, 2017, Patch had emailed Kunicki and Semper, asking for "the original export license [and] original 1977 German translation." Their initial response was that,

We will not be able to give you original original (sic) export and German original translation, just because they lost it.

In that email, neither Kunicki nor Semper explained who "they" were. And Patch does not seem to have asked. But the next day, February 3, 2017, Marsha Hill, Curator of Egyptian Art at the Met, emailed Kunicki and Semper regarding the missing export license. In that email, Hill wrote,

We'd like to understand when the export certificate was lost (it appears to be recently as the scans are in color) and whether you think it might be found?

The next day, Kunicki and Semper responded to Hill and Patch,

You are perfectly right, the scan was done a few years before. The actual owner said the original is today in one of the storage.

Three months later, on May 4, 2017, Patch added at the end of an email to Kunicki and Semper, "PS. He is still looking for the missing suitcase right?" Kunicki must have understood that Patch was referring to the export license, because later that same day, he responded,

Of course Diana we do not forget about the original Arabic export. But as I said to you, I do not know if it will be next week or next year.

It was neither "next week or next year." In fact, the Met never received the promised "original Arabic export."

On June 15, 2017, Daniel Weiss, the President and CEO of the Met, formally notified Dr. Khaled El-Enany, Egyptian Minister of Antiquities, by letter that the Met had acquired the Gold Coffin. Prior to this letter, the last documented communication between the Met and the Egyptian government about the Gold Coffin's export license had been El Shazly's January 2, 2017, email to Kamrin to "[p]lease send me all the data and pics," followed by Kamrin's response that the Met did not "have any copies, electronic or otherwise," of the export license. In response to Weiss's letter, however, the Egyptian Repatriation Department's Abdel Gawad emailed Patch on June 18, 2017, and requested a copy of the 1971 Egyptian export license.

At the time of Abdel Gawad's request, Patch had two copies of the export license that Kunicki and Semper had previously sent her. One copy included the name of Simon Simonian, and

the other copy blacked out the name. Months earlier, on January 25, 2017, Kunicki had requested that Patch delete Simonian's name whenever she used the export license. Apparently, Patch believed that this request was still in effect. She seems to have also believed that it applied to any correspondence she might have with Egypt. It is not clear why she would have held this belief. After all, if the license had been legitimately issued by the Egyptian government, then that government would have already had Simonian's name on their unredacted copy of the export license.

Nonetheless, instead of replying immediately to Abdel Gawad's request, Patch emailed Kunicki on June 19, 2017, notifying him that the Egyptian government had "asked for a copy of the export license." Attaching to the email the copy of the license that deleted Simon Simonian's name, Patch asked Kunicki,

That is the one you would prefer we share, correct?

Kunicki replied ten minutes later, "[y]es correct I would like you to send the copy without the names."

There is no indication that Kunicki or Semper ever explained to Patch (in writing, at least) why Simonian's name needed to be deleted from the export license that was being sent to representatives of the very government that they claimed had issued the license in the first place. Nor does it appear that Patch ever questioned them about the deletion. After Kunicki's reply, Patch emailed Abdel Gawad the copy of the Egyptian export license that deleted the name of Simon Simonian.

The Gold Coffin's Conflicting Provenances

Kunicki and Semper also provided the Met with multiple and mutually inconsistent provenances for the Gold Coffin prior to the Met's purchase.

The first inconsistency concerned the identity of the current owner. The export license provided to the Met by Kunicki and Semper sets forth the following: that Simon Simonian bought the Gold Coffin from the heirs of Habib Tawadros, exported the piece from Egypt, and ultimately sold the piece to "Mme Chatz c/o Rodolphe Haller A.G." in Switzerland.

According to Patch, however, Kunicki and Semper told her that Simon Simonian had sold the Gold Coffin to his brother, Serop Simonian, who was now selling the Gold Coffin to the Met. Thus, on May 10, 2017, when Patch and Kamrin submitted and signed their "Recommendation for Purchase" to the Met's Director, and wrote that, "Serop is the Simonian now selling the coffin," it appeared to contradict the export license.

Then, in March 2017, Kunicki and Semper contacted the Art Loss Register (“ALR”) concerning the Gold Coffin.¹² On March 29, 2017, they emailed the ALR a copy of the export license that stated Simon Simonian had sold the Gold Coffin to Mme. Chatz. But they cryptically added that “[t]he actual owner is Mr. D. from Germany.” In response to the ALR’s subsequent request for additional information, Kunicki and Semper wrote on March 31, 2017, that “[f]rom 1971 to 1984, the work was the property of the Chatz family, Basel, Switzerland. The piece was acquired by the actual owner M. D. from Hambourg, Germany. The actual owner gave me the piece for sale in consignment.” On March 31, 2017, the ALR issued a certificate stating that the Gold Coffin had not “been registered as stolen or missing on our database of stolen and missing art.” Under the provenance section, the ALR certificate listed, “[c]urrent owner Mr. D. in Germany, acquired since 1984. currently on consignment with EURL Christophe Kunicki.” The Met subsequently received the ALR certificate listing Mr. D. in Germany as the current owner.

Thus, on May 10, 2017, when Patch and Kamrin recommended that the museum acquire the Gold Coffin for €3,500,000, it appears that the Met possessed three different accounts of its current owner: 1) “Mme Chatz c/o Rodolphe Haller A.G.” was the owner, having purchased the piece from Simon Simonian; 2) Serop Simonian was the owner, having purchased the piece from Simon Simonian; and 3) the “[c]urrent owner [is] Mr. D. in Germany, acquired since 1984.” There is no record that Patch, or anyone at the Met, noticed the inconsistent ownership claims or questioned anyone about the discrepancies.

The second inconsistency concerned the dealer number used to export the Gold Coffin. Responding to Patch’s question about the dealer number on the Egyptian export license, Semper had replied on January 27, 2017, that dealer number 86 (the number on the license) belonged to Simon Simonian. He explained that “[y]ou will find this number in all exports from him.” To illustrate this, Semper attached a copy of a license for another Egyptian piece purportedly exported by Simon Simonian under dealer number 86.

On January 31, 2017, Kamrin sought to confirm this by emailing both Abdel Gawad and El Shazly of the Ministry of Antiquities: “do you have a list of dealer numbers, and if so, would you be able to tell me who had dealer #86 and where he was located?” On February 10, 2017, Kamrin emailed El Shazly again, asking for “a list of registered dealers from the 20th century? Trying to find out who had dealer #86.” There is no record that Abdel Gawad or El Shazly replied to either of Kamrin’s email inquiries.

Meanwhile, as Kamrin emailing Egyptian officials, Patch continued to question Kunicki and Semper about Habib Tawadros and the identity of dealer number 86.¹³ She wrote to them in

¹² The ALR maintains the world’s largest private database of lost and stolen art. Among other services, the ALR offers a due-diligence service by allowing individuals to search for items against their database. When a stolen item is located, the ALR also offers a recovery service.

¹³ On January 26, Semper wrote to Patch that the “licence number” belonged to “S.M.,” but then identified “S.M.” as Simon Simonian. The use of “S.M.,” therefore, does not appear to be intended to deceive.

an email on February 10, 2017, that she had “run into a dead end when it comes to the name Habib Todros of the permit.” Then, on February 28, 2017, Kunicki wrote to Patch that,

You are right: when you read the export and German translation, you understand that Simon was acting as an agent of the heirs. The reality was different. Simon did buy the stock but at that time it was impossible to acquire or to transmit an export licence (sic). This is why, in all export permit of Simon Simonian you will find the reference 86 (the one of Habib).

In fact, the reason “it was impossible” for Simon Simonian to get an export license was because he had previously improperly registered Tawadros’s shop in his own name. As a result, Egyptian authorities had cancelled Simon Simonian’s antiquities license on June 8, 1971. He was not granted a temporary permit until September 1972. Because Patch had sent Egypt the export license with Simonian’s name deleted, Egypt had no reason to notify the Met that Simonian was not authorized to export under Tawadros’s dealer number. Nor is there is any indication that Patch, or anyone at the Met, received this information about Simonian from any other source prior to the Met’s purchase of the Gold Coffin.

The Gold Coffin in New York

On April 10, 2017, Kunicki shipped the Gold Coffin from Paris to New York on a commercial American Airlines flight. According to an Entry Summary from U.S. Customs and Border Protection, the Gold Coffin entered the United States on April 14, 2017. After the Gold Coffin arrived at the Met, it was inspected by the Met’s conservation team. The Met determined that extensive restoration work had been done on the Gold Coffin’s lid. Kunicki had previously told Patch in December 2016 that minimal work had been done on the base and interior of the Gold Coffin. After Patch questioned Kunicki about this discrepancy, Kunicki ultimately admitted in an email on May 4, 2017, that “the German restorer...gilded some little areas where the gilding was missing.” The Met appears to have accepted this explanation. At all events, the sale continued to move forward.

On July 4, 2017, Kunicki issued an invoice for the Gold Coffin to the Met for €3,500,000 (approximately \$4,000,000). On July 6, 2017, the Met and Kunicki executed an agreement formally transferring the Gold Coffin to the Met.

After this Office initiated the subject grand-jury investigation into this international antiquities-trafficking ring and determined that the Gold Coffin was stolen, I notified the Met’s legal counsel of the existence of this investigation and requested their cooperation. Since then, that cooperation has been complete and unstinting. I thereafter presented to representatives of the Met a portion of the evidence as it related to the theft and illegal trafficking of the Gold Coffin, requesting that the Met consider waiving a hearing and consent to the repatriation of the Gold Coffin to Egypt. They were under no legal requirement to do so, but on April 4, 2019, the Met formally stipulated to that return.

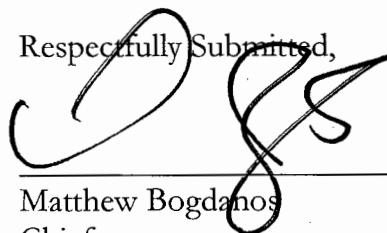
Conclusion

In 1983, Egypt enacted Law No. 117 “on the Protection of Antiquities.” Article 1 defines an antiquity as “any movable or immovable property that is a product of any of the various civilizations...to a point one hundred years before the present and that has archaeological or historical value or significance as a relic of one of the various civilizations that have been established in the land of Egypt.” Article 6 vests ownership of such property in the Egyptian state: “All antiquities...shall be deemed public property, and the ownership, possession and disposition of them shall be subject to the terms and conditions set forth in this law and regulations made thereunder.” Article 7 states that “[a]ll trade in antiquities shall be prohibited as from the date of coming into force of this law.” Finally, Article 9 prohibits the export of any antiquities without an export license: “no antiquity is to be taken outside the country.” Under our law, therefore, this clear declaration of national ownership is sufficient to render Egypt the “owner” of all antiquities found inside your country after its enactment. Thus, any antiquity removed from Egypt after 1983 in violation of Egypt’s exportation laws, constitutes “stolen property” under New York State criminal law.

The Gold Coffin was illegally excavated in the Arab Republic of Egypt in or around October of 2011, illegally smuggled out of the country, subsequently supplied with a forged export license and false provenance, and laundered by an international antiquities-trafficking ring. As such, the Gold Coffin constitutes stolen property under New York State criminal law, and must be returned to its lawful owner. The Gold Coffin remains safely in the custody of this Office until the Arab Republic of Egypt is able to schedule a date for its repatriation.

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

Respectfully Submitted,



Matthew Bogdanos
Chief
Antiquities Trafficking Unit
(212) 335-9323

cc: Sharon Cott, Esquire
Secretary and General Counsel, Metropolitan Museum of Art
1000 Fifth Avenue
New York, NY 10028
United States

Rebecca Noonan Murray, Esquire
Senior Associate General Counsel
1000 Fifth Avenue
New York, NY 10028
United States

Anjan Sahni, Esquire
250 Greenwich Street
New York, NY 10007
United States

Minister Plenipotentiary Hani Nagi
Deputy Consul General
Consulate General of Egypt in New York
866 United Nations Plaza, Suite 586
New York, NY 10017
United States

Shaaban Abdel-Gawad
Head of the Repatriation Department
3 el Adel Abou Bakr Street, Zamalek,
Cairo
Arab Republic of Egypt

Dr. Yasmin El-Shazy
Egyptian Museum
Ismailia, Qasr an Nile
Cairo
Arab Republic of Egypt

Stephane Blumel
Adjudant-chef de Gendarmerie
Direction Centrale de la Police Judiciaire
101-103 rue des trois Fontanot
92000 Nanterre
France

Laura Tobelem
Substitute du procureur de la République
11 avenue du Docteur Arnold Netter
75012 Paris, 12E
France

Saliha Hand Ouali
Substitute du procureur de la République
Parquet du Tribunal de Grande Instance de Paris
Parvis du Tribunal de Paris
75017 Paris, 17E
France

Silvelie Karfeld
Bundeskriminalamt
SO11 Kunst- und Kulturgutkriminalität
Postfach
D-65173 Wiesbaden
Germany