



DEPARTMENT OF THE ARMY
ST. LOUIS DISTRICT, CORPS OF ENGINEERS
1222 SPRUCE STREET
ST. LOUIS, MISSOURI 63103-2833

CEMVS-EC-Z

13 August 2018

MEMORANDUM FOR SEE DISTRIBUTION

SUBJECT: Responsibility for Archaeological Collections Looted from Corps Fee-title land and Collections being used as Evidence

1. References:

- a. Archaeological Resources Protection Act of 1979, 31 Oct 1979.
- b. 36 C.F.R. Part 79, Curation of Federally-Owned and Administered Archaeological Collections, 12 Oct 1990.

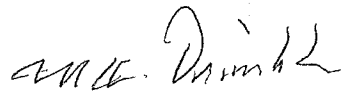
2. The Mandatory Center of Expertise (MCX) for the Curation and Management of Archaeological Collections (CMAC) was established in the St. Louis District in 1994 to deliver centralized policy, management, and administration development for USACE-wide compliance with archeological collections management. The MCX CMAC has been tasked to manage the Corps-wide regionalization effort for archaeological collections and associated documentation to achieve compliance with federal curation standards and efficiencies in collections management.

3. As part of the regionalization effort, the MCX is performing a nation-wide collections inventory to identify the location and volume of Corps collections. This research has identified the presence of collections that were illegally removed (i.e., looted) from Corps land. Some materials were donated by the looters to a particular museum (without Corps consent), while other materials are still being kept as evidence by law enforcement.

4. The Archaeological Resources Protection Act of 1979 (Reference 1.a) specifies that no person may excavate, remove, damage, or otherwise alter or deface or attempt to excavate, remove, damage, or otherwise alter or deface any archaeological resource located on public lands. Furthermore, it states that no person may sell, purchase, exchange, transport, receive, or offer to sell, purchase, or exchange any archaeological resource if such resource was excavated or removed from public lands.

5. There have been questions regarding who is responsible for the long-term curation of these collections. Any collections removed from Corps fee-title land are owned by the Corps. The responsibility for the curation of these collections lies with the Corps, and these materials will be regionalized. Any materials currently being used as evidence by law enforcement officials will remain at their current location until they are no longer required. Once the case is closed, these materials will be sent to the appropriate regional center by the MCX.

6. Questions regarding the regionalization effort should be directed to Ms. Andrea Farmer, MCX CMAC, Chief Curator (314-331-8067). Policy questions should be directed to Dr. Michael Trimble, MCX CMAC, Director (314-331-8466).

A handwritten signature in black ink, appearing to read "Michael K. Trimble". The signature is written in a cursive style with a large initial "M".

MICHAEL K. TRIMBLE, Ph.D.
Director, Mandatory Center of Expertise
for the Curation and Management of
Archaeological Collections