

United States Senate

WASHINGTON, DC 20510

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June 3, 2026

The Honorable Scott Bessent
Secretary
U.S. Department of Treasury
1500 Pennsylvania Avenue NW
Washington, DC 20220

The Honorable Andrea M. Gacki
Director
FinCEN
1500 Pennsylvania Avenue NW
Washington, DC 20220

Dear Secretary Bessent and Director Gacki:

I write to urge FinCEN to promulgate rulemaking requiring antiquities dealers to comply with anti-money-laundering laws. I am very concerned that looted antiquities are helping fund the Iranian terrorist regime, as well criminal enterprises and other sanctioned actors. In 2020, Congress passed bipartisan legislation requiring FinCEN to issue proposed rules for antiquities dealers, but those rules were withdrawn and never finalized. Final rulemaking would provide regulatory clarity to antiquities dealers, and help law enforcement fight the use of looted antiquities to fund terrorism, sanctions evasion, and criminal cartels.

On September 24, 2021, FinCEN issued an Advanced Notice of Proposed Rulemaking (ANPRM) pursuant to Section 6110 of the Anti-Money Laundering Act of 2020. The law amended the Bank Secrecy Act to require compliance with anti-money-laundering and counter-terror-financing laws by antiquities dealers. FinCEN required public comments on the proposed rule by October 25, 2021, but the Notice of Proposed Rulemaking was never published in the *Federal Register* and the ANPRM was subsequently withdrawn.

The use of looted antiquities for illicit finance and terror-funding is a serious national security concern. In February, CBP in Philadelphia intercepted Bronze Age swords and arrowheads originally from Iran.¹ Experts in this field note that the Iranian Revolutionary Guard and other elements in the Iranian terrorist regime may be actively looting Iran's cultural heritage.² Looted antiquities have been used to funnel money to terrorists, criminals, and America's enemies. Documented cases of such illicit activities include:

¹ U.S. Customs and Border Protection, *Philadelphia CBP officers intercept Bronze Age swords and arrowheads from the northeastern region of Iran* (Press Release), (February 27, 2026),

<https://www.cbp.gov/newsroom/national-media-release/philadelphia-cbp-officers-intercept-bronze-age-swords-and>

² Rick St. Hilaire, *Before looters move in, strengthen Iran sanctions on antiquities trafficking* (Op-ed), The Hill, (March 21, 2026), <https://thehill.com/opinion/5793339-protect-iran-ancient-heritage/>

- Houthi terrorists and Al Qaida in the Arabian Peninsula have looted Yemeni artifacts to fund violence against the U.S, Israel, and international shipping lanes.³
- ISIS regularly sold stolen artifacts from Syria and Iraq.⁴
- Kremlin cronies have used antiquities to evade sanctions.⁵
- Convicted criminals Eugene Alexander and Michael Ward trafficked looted antiques worth over \$31 million on American soil.⁶
- Cartels and drug-traffickers have used antiquities from Latin America, including pre-Colombian artifacts, to fund their criminal operations.⁷

Finalizing rulemaking to require basic due-diligence in the antiquities industry will help law enforcement stop the pipeline of funding to American’s adversaries from looted antiquities. Many industries, including casinos, jewelers, and pawn shops, already do basic due-diligence on their customers to stop money laundering and terrorist financing. Last year I introduced the bipartisan *Art Market Integrity Act* to require anti-money-laundering compliance by art dealers, another area of serious concern for illicit finance. FinCEN already had the authority to promulgate rules for antiquities dealers and should move forward expeditiously. I urge FinCEN to quickly finalize this rule and provide the clarity that antiquities dealers need to engage in this kind of basic due-diligence.

I request that you provide a response to this letter by July 2nd, 2026.

Sincerely,



John Fetterman
United States Senator

³ Tom Mashberg, *Yemen Asks U.S. for Help to Curb Smuggling of Looted Ancient Artifacts*, New York Times, (March 6, 2019), <https://www.nytimes.com/2019/03/06/arts/design/yemen-united-states-looted-artifacts.html>

⁴ Benoit Faucon, Georgi Kantchev, and Allistair MacDonald, *The Men Who Trade ISIS Loot*, Wall Street Journal, (August 6, 2017), <https://www.wsj.com/articles/the-men-who-trade-isis-loot-1502017200>

⁵ Department of Justice, *TV Presenter Who Worked for Channel One Russia Charged with Violating U.S. Sanctions Imposed on Russia* (Press Release), (September 5, 2024), <https://www.justice.gov/archives/opa/pr/tv-presenter-who-worked-channel-one-russia-charged-violating-us-sanctions-imposed-russia>

⁶ Association for Research Into Crimes Against Art, *From Dubai to Zurich: Eugene Alexander faces justice in antiquities trafficking case* (blog post), (July 5, 2025), <https://art-crime.blogspot.com/2025/07/from-dubai-to-zurich-eugene-alexander.html>

⁷ David Hidalgo, *The Hidden Stories of the Cultural Looting of Latin America*, OjoPúblico, (Accessed June 3, 2026), <https://memoriarobada.ojo-publico.com/investigaciones/the-hidden-stories-of-the-cultural-lootingof-latin-america/>