

Statement of the Association of Art Museum Directors Concerning the Proposal to Extend the Memorandum of Understanding between the Government of the United States of America and the Government of Belize Concerning the Imposition of Import Restrictions on Categories of Archaeological Material Representing the Cultural Heritage of Belize from the Pre-Ceramic (Approximately 9000 B.C.), Pre-Classic, Classic, and Post-Classic Periods of the Pre-Columbian Era through the Early and Late Colonial Periods

Meeting of the Cultural Property Advisory Committee

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I. Introduction

The Association of Art Museum Directors (the “AAMD”) respectfully submits the following statement to the Cultural Property Advisory Committee (the “Committee”) in connection with the proposed renewal of the *Memorandum of Understanding between the Government of the United States of America and the Government of Belize Concerning the Imposition of Import Restrictions on Categories of Archaeological Material Representing the Cultural Heritage of Belize from the Pre-Ceramic (Approximately 9000 B.C.), Pre-Classic, Classic, and Post-Classic Periods of the Pre-Columbian Era through the Early and Late Colonial Periods* (the “MOU”). Under the Convention on Cultural Property Implementation Act (the “CCPIA”), the United States and Belize entered into the MOU on February 27, 2013,¹ to protect archaeological material dating from about 9000 BCE to “at least” 250 years ago. The United States and Belize renewed the MOU for an additional five years on February 23, 2018.²

II. Discussion

A. Preliminary Statement

The extension of an MOU that imposes import restrictions is appropriate only when circumstances persist that merit the continuation of such restrictions. Among those considerations is evidence that the requesting nation is taking steps to protect its own cultural patrimony. The AAMD recognizes that Belize has made some forward strides in promoting conservation, such as through social-media outreach and community engagement by an arm of the National Institute of Culture and History (“NICH”). Progress has also been made on

¹ Memorandum of Understanding between the Government of the United States of America and the Government of Belize Concerning the Imposition of Import Restrictions on Categories of Archaeological Material Representing the Cultural Heritage of Belize from the Pre-Ceramic (Approximately 9000 B.C.), Pre-Classic, Classic, and Post-Classic Periods of the Pre-Columbian Era through the Early and Late Colonial Periods, U.S. – Belize, Feb. 27, 2013, T.I.A.S. No. 13-227, *available at* <https://www.state.gov/13-227>.

² Memorandum of Understanding between the Government of the United States of America and the Government of Belize Concerning the Imposition of Import Restrictions on Categories of Archaeological Material of Belize, U.S. – Belize, Feb. 23 & 27, 2018, T.I.A.S. No. 18-223.1, *available at* <https://www.state.gov/18-223-1/>.

environmental aspects as well.³ Yet alarming examples of serious, and apparently unchecked, destruction of important archaeological sites in Belize have emerged since the MOU's renewal in 2018. Funding for cultural initiatives in Belize also appears to have been significantly compromised during the COVID-19 pandemic. These circumstances raise doubts about Belize's ability and, perhaps, appetite to protect its cultural heritage, as required under the CCPIA for an extension of the MOU.

If the Committee nevertheless determines that an extension of the MOU is appropriate, then the AAMD will support that extension, but under the following conditions: (1) the objects protected under the extended MOU should be limited to those archaeological objects that meet the requirements for protection under the CCPIA as of the date of the MOU; (2) the MOU should contain provisions for meaningful cultural exchange between the United States and Belize; and (3) the MOU should not contain the Article II boilerplate provisions with respect to cultural exchange used in MOUs since at least 2017.

B. Belize's Efforts to Protect its Cultural Patrimony are Inconsistent with the 1970 UNESCO Convention

To make a recommendation to the President to extend an MOU, the Committee must find that each of four determinants under the CCPIA are satisfied.⁴ Among those determinants is a requirement that the requesting nation has taken measures consistent with the 1970 UNESCO Convention on the Means of Prohibiting and Preventing the Illicit Import, Export, and Transfer of Ownership of Cultural Property (the "Convention")⁵ to protect the nation's own cultural heritage.⁶ Specifically, Article 5 of the Convention outlines the measures that a State Party may take, as appropriate, to protect its cultural property. Those measures include, but are not necessarily limited to, enacting laws and regulations designed to secure the protection of cultural heritage; promoting the development or establishment of institutions to ensure the preservation and presentation of cultural property; and ensuring the preservation *in situ* of cultural property.⁷

For the reasons outlined below, the AAMD is concerned that Belize's efforts to protect its cultural patrimony are out of step with the requirements under the Convention, and that, accordingly, a recommendation to extend the MOU is not appropriate at this time.

³ Belize was able to remove its sole World Heritage Site—a coral reef—from UNESCO's World Heritage in Danger list in 2018. See Tryggvi Adalbjornsson, *A Victory for Coral: UNESCO Removes Belize Reef From Its Endangered List*, N.Y. TIMES (June 28, 2018), <https://www.nytimes.com/2018/06/27/climate/belize-reef-unesco.html>.

⁴ 19 U.S.C. §§ 2602(a)(1) & 2605(f)(1).

⁵ Convention on the Means of Prohibiting and Preventing the Illicit Import, Export, and Transfer of Ownership of Cultural Property, Nov. 14, 1970, 823 U.N.T.S. 231 [hereinafter *Convention*].

⁶ 19 U.S.C. § 2602(a)(1)(B).

⁷ *Convention*, art. 5, a, c–d.

1. *Destruction and Looting Due to Construction and Agriculture*

Belize's Institute of Archaeology (the "IA"), housed within the NICH, strives to encourage community engagement and participation in cultural preservation. The IA uses social media to educate the public (for example, about the destructive effects of graffiti on a culturally sensitive site);⁸ circulate alerts about the illegality of buying and selling antiquities;⁹ and recognize local community members for their contribution to protecting Belize's cultural heritage.¹⁰ The IA also recently collaborated with the Archaeological Institute of America to hold poster contests to promote the protection and preservation of Belize's archaeological sites in response to looting and destruction.¹¹ In addition, the NICH, in collaboration with foreign archaeologists, has promoted pride in and appreciation for Belizean cultural heritage through community programming.¹²

These efforts are praiseworthy, but there remain alarming examples of destruction and looting of ancient sites in Belize. Perhaps most notably, the Mayan ceremonial center known as the Nohmul complex, considered to be one of the most important historical sites in Belize, was destroyed in 2021 by construction workers using heavy machinery during a road-building project.¹³ This site, formerly consisting of a 100-foot tall pyramid believed to be at least 2,300 years old, was reportedly demolished so that the structure's limestone blocks could be repurposed for road fill.¹⁴ Such destruction is not isolated to the Nohmul complex, as "bulldozing Maya mounds for road fill is an endemic problem in Belize," according to Norman Hammond, emeritus professor of archaeology at Boston University.¹⁵ As Francisco

⁸ Institute of Archaeology (NICH) Belize, "If you know Kyle or Randy, please spread the message of cultural preservation to them. Looting is not the only destructive force contributing to the loss of our patrimony," FACEBOOK (Apr. 8, 2019), <https://tinyurl.com/36zvhphe>.

⁹ Institute of Archaeology (NICH) Belize, "We would like to remind the people of Belize that the buying and selling of antiquities is illegal," FACEBOOK (June 19, 2019), <https://tinyurl.com/375sh4nr>.

¹⁰ Institute of Archaeology (NICH) Belize, "With people making replicas, everyone can enjoy a piece of the ancient Maya culture in their homes without the need to buy illicitly acquired pieces, thus decreasing looting. Kudos to Mr. Magaña!," FACEBOOK (Dec. 13, 2016), <https://tinyurl.com/4e4vb99z>.

¹¹ *Virtual – Hybrid – Anti Looting and Graffiti Poster Competition*, ARCHAEOLOGICAL INST. AM. (Oct. 1–11, 2019), <https://www.archaeological.org/event/anti-looting-and-graffiti-poster-competition/>.

¹² Meaghan Peuramaki-Brown & Sylvia Batty, *Belize shows how local engagement is key in repatriating cultural artifacts from abroad*, CONVERSATION (Nov. 15, 2021), <https://theconversation.com/belize-shows-how-local-engagement-is-key-in-repatriating-cultural-artifacts-from-abroad-171363>.

¹³ Snober Abbasi, "Ignorant" Builders Destroy 2,300-year-old Mayan Pyramid in Belize, INCPAK (Dec. 5, 2021), <https://www.incpak.com/education/ignorant-builders-destroy-2300-year-old-mayan-pyramid-in-belize-with-bulldozers/>; *Belize: Ancient Maya Ceremonial Pyramid Destroyed By Construction Company*, ARCHAEOLOGIST (Apr. 16, 2021), <https://www.thearchaeologist.org/blog/belize-ancient-mayan-ceremonial-pyramid-destroyed-by-construction-company> (reporting that "bulldozers and backhoes . . . carr[ie]d out the works, chipping away at the pyramid's sides until barely anything was left.").

¹⁴ *Belize: Ancient Maya Ceremonial Pyramid Destroyed*, *supra* note 13.

¹⁵ Abbasi, "Ignorant" Builders, *supra* note 13.

Estrada-Belli of Tulane University further noted, “I don’t think I am exaggerating if I say that every day a Maya mound is being destroyed for construction.”¹⁶

At least one other important, ancient Mayan site in Belize has been similarly compromised by deforestation and agricultural activity before scientific surveys could be conducted. Lisa Lucero, professor of anthropology at the University of Illinois, recently reported that since 2018, the Mayan pilgrimage site of Cara Blanca has undergone significant change due to farming, with “thousands of acres of jungle . . . gone, replaced by fields of corn and sugarcane.”¹⁷ This jungle-clearing activity exposed “hundreds of ancestral Maya mounds” that are now plowed over several times a year.¹⁸ Professor Lucero further noted that “many non-Maya actually focus their farming efforts on sites with lots of mounds because they know the ancestral Maya chose the best soils.”¹⁹ Although Professor Lucero is engaged (with permission from NICH and local farmers) in a salvage-archaeology project, called “plow archaeology,” to collect as much information from the mounds as possible before they are entirely demolished, her and her team’s attempts to “interpret the architecture that has been plowed” are complicated by the destruction of the site.²⁰

The destruction of ancient sites with seeming impunity calls into question the ability of Belizean authorities to protect domestic cultural heritage, as well as the appetite for stricter laws, diligent enforcement, and harsher penalties.

2. *Funding Shortages Impacting Preservation and Security*

In 2016, Belize issued its first National Cultural Policy, which, among other initiatives, outlined policies to “ensure that all national laws on culture are harmonized with the provisions of the [Convention];” maintain “culture houses . . . [to] provide opportunities for the creation, production and demonstration of community cultural forms and materials;” and provide budgetary support for such initiatives.²¹ Following on from these outlined goals, Belize enacted the National Cultural Preservation Act in 2017, which in part provided for the creation of an inventory of cultural assets, called the National Heritage Asset Register.²²

¹⁶ *Belize: Ancient Maya Ceremonial Pyramid Destroyed*, *supra* note 13.

¹⁷ Lisa Lucero, *Rescuing ancient Maya history from the plow*, ILL. NEWS BUREAU (June 22, 2022), <https://news.illinois.edu/view/6367/254508740>.

¹⁸ *Id.*

¹⁹ *Id.*

²⁰ *Id.*

²¹ *Belize National Cultural Policy 2016–2026* (2015), available at <https://www.dgft.gov.bz/wp-content/uploads/2017/08/Copy-of-National-Cultural-Policy-Final-Policy-Document-1.pdf>.

²² *National Cultural Heritage Preservation Act, 2017*, available at <https://sitca.info/wp-content/uploads/2019/09/Ley-de-preservacion-del-Patrimonio-Cultural-Nacional-2017-ingles.pdf> (last visited July 13, 2022).

The AAMD commends these recent efforts but notes that funding shortages appear to be hindering Belize’s implementation of its policies and mandated programs. No public database with registered cultural monuments has yet been launched, thereby impeding the ability to trace looted objects.²³ In addition, financial difficulties forced the NICH to close all houses of culture in 2021 for an indefinite period.²⁴ The lack of revenue to support security measures in Belize—in accordance with the Convention’s requirements for site protection—is a particular area of concern. For example, reports from 2020 indicate that tourists who visited the El Pilar archaeological site were victimized by masked, armed robbers.²⁵ Although the IA reportedly “discourages tour guides from taking visitors to El Pilar,” the site lacks warnings about possible dangers. Furthermore, the site’s protections rest primarily in the hands of three, unarmed IA staff.²⁶ Despite the security provided by the Belize Defense Force or Tourist Police in other locations, such as Caracol, armed robberies along the route to that site have also been reported.²⁷ Because the CCPIA requires a requesting nation to provide adequate protections for its cultural heritage, the evident lack of such protections in Belize suggests that the requirements for the MOU’s extension have not been satisfied.

C. CCPIA’s Limited Scope of Protections

1. Cultural Significance

The CCPIA provides that the United States may enter into or extend a bilateral agreement, like the MOU, with a foreign state that has adopted the Convention and is requesting the imposition of United States import restrictions on certain archaeological or ethnological materials (the “Designated List”) from the foreign state.²⁸ The CCPIA, in turn, charges the Committee with the responsibility of reviewing, evaluating, and making recommendations regarding such requests for import restrictions.

Archaeological materials are protected under the CCPIA if they are (a) of cultural significance; (b) at least 250 years old; and (c) typically discovered through scientific

²³ A 2014 report indicated that a shortage of equipment and staff hindered the creation of an online database. See Donna Yates, *Reality and Practicality: Challenges to Effective Cultural Property Policy on the Ground in Latin America*, 22 INT’L J. CULTURAL PROP. 344 (2015). To date, no publicly accessible database of registered Belizean cultural sites or objects could be identified.

²⁴ Janelle Cowo, *San Pedro House of Culture to remain closed; staff terminated*, SAN PEDRO SUN (Apr. 10, 2021), <https://www.sanpedrosun.com/community-and-society/2021/04/10/san-pedro-house-of-culture-to-remain-closed-staff-terminated/>.

²⁵ Menzies Courtney, *Tourists robbed at El Pilar*, LOVE FM (Mar. 3, 2020), <https://www.lovefm.com>; see also *DO NOT VISIT EL PILAR!*, TRIPADVISOR (Mar. 7, 2020), http://www.tripadvisor.com/ShowUserReviews-g291971-d4040388-r749736275-El_Pilar-San_Ignacio_Cayo.html.

²⁶ *DO NOT VISIT EL PILAR!*, *supra* note 25.

²⁷ *DO NOT VISIT EL PILAR!*, *supra* note 25; see also Jeffery Van Fleet, *These 10 Mayan Ruins in Belize Will Make Your Jaw Drop*, FODORS TRAVEL GUIDE (Aug. 5, 2020), <https://www.fodors.com/world/mexico-and-central-america/belize/experiences/news/these-10-mayan-ruins-in-belize-will-make-your-jaw-drop>.

²⁸ 19 U.S.C. § 2602(a)(2)(A), (e).

excavation, clandestine or accidental digging, or exploration on land or underwater.²⁹ “Cultural significance” does not apply to every object of a particular type or material. Legislative history reveals that bilateral agreements under the CCPIA were intended to apply only to a “narrow range of objects possessing specific characteristics.”³⁰ By contrast, the MOU’s protections extend to certain objects that were created over an *eleven-thousand-year span*, without any limitation as to archaeological site, geographical location, or cultural identity. Although some contend that all archaeological material is of cultural significance, such a stance renders the limitation language of the CCPIA meaningless.

The limitations expressed in the CCPIA and its legislative history are intended to preserve the delicate balance between U.S. interests in supporting the international art market against situations where protection is required due to jeopardy from the pillage of archaeological and/or ethnological material. The practicalities of implementing the import restrictions outlined in a bilateral agreement provide a temptation not only to foreign states to request, but also for the Committee to approve, Designated Lists that outline overly broad categories of objects entitled to protections—as is clearly the case with Belize. Although broadly defined Designated Lists may streamline customs and border-patrol agents’ work, in that broad categories prevent such agents from having to make nuanced differentiations between legally and illegally imported objects, the CCPIA’s legislative history shows that Congress did not intend for Designated Lists to include sweeping categories of objects. For some time now, in contravention of the CCPIA, the Committee has recommended the acceptance of broadly defined Designated Lists. This outcome is not what Congress intended.

2. *Creeping Import Restrictions*

Most troubling, Article I of the MOU provides in pertinent part that the United States will restrict the importation “of certain archaeological material [from Belize] that is at least 250 years old.” This language also appears in the Designated List. The language creates a creeping date for objects subject to import restriction, which is violative of the CCPIA. The CCPIA provides that no object can be considered an object of archaeological interest unless such object “is at least two hundred and fifty years old.”³¹

The President’s authority to impose import restrictions is limited and, after making the necessary determinations, he is authorized to enter into a bilateral agreement “to apply the import restrictions set forth in section 2606 of this title to the archaeological . . . material of the

²⁹ 19 U.S.C. § 2601(2)(C)(i); *see also* ANN GUTHRIE & MARIA PAPAGEORGE KOUROUPAS, *Information on Convention on Cultural Property Implementation Act (PL 97-445) 2* (1985).

³⁰ S. REPORT NO. 97-564, at 4, (1982), *available at* <https://eca.state.gov/files/bureau/97-564.pdf> (“Only the term ‘archaeological or ethnological materials of the State Party’ requires fuller explication here. The Convention does not define these terms. The definition is intended by the committee to reflect the understanding of U.S. negotiators that the application of import restrictions under agreements entered into under **Section 203** or emergency actions taken under **Section 204** is limited to a narrow range of objects possessing certain characteristics.”) (original emphasis).

³¹ 19 U.S.C. § 2601(2)(C)(i)(II).

State Party.”³² In order for an object to be covered by import restrictions, it must meet the definition of “archaeological material,” and to meet the definition of “archaeological material,” it has to be at least 250 years old at the time the import restrictions are imposed, not at some future date randomly selected by the President.

What the Belize Designated List attempts to do is to create a creeping import restriction that everyday expands the objects subject to restrictions. As a result, now with the second renewal anticipated, if the language were to remain the same, there would be fifteen years’ worth of new objects subject to import restrictions with no action taken by the President or this Committee. Not only does this violate the definition of archaeological material, but it usurps the authority of this Committee. The Committee is required to determine that “archaeological material,” as defined in the CCPIA, is subject to pillage. There are two concepts here, one definitional and the other temporal. Objects that are not at least 250 years old are not by definition archaeological material. But on the day after the Belize Designated List went into effect, a new category of objects that did not meet the definition of archaeological material was (at least on its face) suddenly subject to import restrictions. And this occurs with no finding by this Committee that in fact those objects were subject to pillage because the Committee could not make such a finding as to future objects that do not meet the definition of archaeological material at the time of the finding.

Perhaps even worse, the use of the creeping 250 years makes the Committee’s determination of renewal inconsistent with the CCPIA. As we understand the request, this is a request for renewal only, not an expansion of the MOU. Nevertheless, as drafted, this is not a renewal but an endorsement of an expansion of objects to be covered in the future without any specific finding by the Committee consistent with the CCPIA.

This is at least the second time this creeping concept has found its way into an MOU and Designated List. The last time this occurred was with respect to China in 2013. When it was pointed out to the Committee and the State Department (by the AAMD and others) that this was inconsistent with the CCPIA, amendments were put in place in order to pin the 250-year requirement to the date of the MOU.

Should the Committee issue a recommendation to extend the MOU, the Committee must also insist on a revision to the MOU so that it specifies that the 250-year restriction on archaeological material is measured from the date of the original MOU (*i.e.*, February 27, 2013). To fail to correct this error calls into question the very validity of the MOU and the Designated List.

D. Boilerplate Article II

During the previous hearing to extend Belize’s MOU, the AAMD provided the Committee with suggestions to improve cultural exchanges, none of which were implemented under Article II. Instead, the MOU uses a standardized Article II, rather than a set of tailored provisions that provide customized guidance and measurable goals. A boilerplate Article II,

³² 19 U.S.C. § 2602(a)(2)(A).

devoid of specifics and divorced from actual experience, cannot possibly foster the interchange of cultural property. Since approximately 2017, the State Department has approved MOUs that use certain standardized provisions. Troublingly, and despite the successful outcomes that tailored Article II provisions foster, the State Department has apparently adopted a policy of using standardized Article IIs. The adoption of boilerplate provisions in Article II is illogical for the simple reason that no two countries are alike. Each foreign state has its own history and cultural property and faces different threats to those materials and different interests from those in the U.S. for excavations, exhibition loans, scientific research, etc. Implementing the same Article II for Belize and Libya, for example, makes no logical sense, especially when considering the purpose of Article II.

What is apparently an administrative convenience for the State Department as a result of current policy is a disservice to the American public and inconsistent with the CCPIA. Article II is comprised of “goals . . . contained in a special section of any agreement”³³ with programmatic elements meant to “open the way to improved and sustainable strategies for protecting a country’s national patrimony and making such patrimony accessible for,” among other things, cultural exchange.³⁴ At least one former member of the Committee, Lothar van Falkenhausen, recognized that MOUs must be tailored to address a foreign state’s specific needs: he opined that each renewal request provides “an opportunity for recommending improvements in the form of amendments to the agreement”³⁵ and that the MOUs are “tailored” to each country; indeed, “there are no boilerplate agreements here.”³⁶ Yet the State Department’s adoption of generic, boilerplate language in MOUs means that specific mandates regarding cultural-exchange practices,³⁷ as well as provisions regarding anti-looting measures³⁸—former mainstays of MOUs—have disappeared.

A “standardized” Article II fails to provide verifiable goals for the Committee and State Parties, preventing them from taking effective measures consistent with the MOU to protect their own cultural property and stop looting within their own borders. When a State Party requests an extension, the Committee lacks the criteria to evaluate performance in the absence of verifiable goals. By implementing a “standardized” Article II now, the Committee hinders its ability to carry out its responsibilities in the future. Specific goals can provide the Committee with criteria to evaluate Belize’s performance under an extended MOU. As

³³ Maria P. Kouroupas, *Combating Cultural Property Looting and Trafficking: the US Experience*, 20 UNIF. L. REV. 528, 531 (2015), <https://academic.oup.com/ulr/article/20/4/528/2472097>.

³⁴ *Id.* at 533.

³⁵ See Lothar von Falkenhausen, *Trying to do the Right Thing to Protect the World’s Cultural Heritage: One Committee Member’s Tale*, in OBAMA AND TRANSNATIONAL AMERICAN STUDIES 375, 377 (Alfred Hornung ed., 2016).

³⁶ *Id.* at 378.

³⁷ John G. Roberts, *Memorandum for Fred F. Fielding; Ronald Reagan Presidential Library Digital Library Collections; Collection: Roberts, John G./Cultural Property Review Board (1 of 4); Box 15*, (1985).

³⁸ Kouroupas, *supra* note 33 at 533.

Congress specified, countries with an MOU must “take significant self-help measures”³⁹ to justify the imposition of import restrictions pursuant to the CCPIA. With evaluation criteria embedded in an extended MOU, the Committee can assess compliance with this Congressional objective as it applies to cultural exchange.

The AAMD has learned that the State Department has begun, at least in some recent cases, to create “action plans” that outline the cultural-exchange goals that a foreign State Party to an MOU is expected to achieve. Among the countries for which action plans have been developed are Cambodia, Libya, and Mali. The action plans appear to provide the country-specific objectives outlined in Article IIs before 2017. How the action plans function, *i.e.*, whether they are part of the MOU and “binding” on the relevant State Parties, is unclear. The absence of clarity regarding the action plans extends to the fact that they are not widely accessible; for instance, they are not posted on the Committee’s website alongside the MOUs and the Designated Lists. The AAMD continues to request additional information from the Committee regarding the function of action plans, specifically whether they serve as a substitute for country-specific, custom-tailored Article IIs and whether they carry the same weight as Article II.

If such action plans carry the same weight as tailored Article IIs, then the AAMD does not oppose developing an action plan for Belize that incorporates the recommendations outlined in this Statement. All action plans, whether for Belize or any other State Party, should be made publicly accessible in the same manner as MOUs and Designated Lists and should be at least referenced, if not incorporated, in the MOU so as to have a legal basis for review. The question still remains, if such action plans are equivalent to Article II, why have a separate action plan and a generic Article II?

III. Conclusion

The perception persists that once executed, MOUs are perpetual and unchangeable. Contrary to the intent of CCPIA, the Committee should examine Belize’s request to extend the MOU with great care. While Belize has made progress, widespread evidence of destruction suggests that Belize’s efforts to protect its domestic cultural heritage fall short of the standard envisioned under the Convention and, by extension, the requirements under the CCPIA to renew an MOU. Should the Committee nevertheless determine that the MOU with Belize should be extended, (1) the objects protected under the extended MOU should be limited to those archaeological objects that meet the requirements for protection under the CCPIA, *e.g.* they must be at least 250 years old as of February 27, 2013; (2) the MOU should contain provisions for meaningful cultural exchange between the United States and Belize; and (3) the MOU should not contain the boilerplate Article II.

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³⁹ Kate Fitz Gibbon, *Congress Holds CPAC Accountable*, CULTURAL PROP. NEWS (July 25, 2017), <https://culturalpropertynews.org/congress-holds-cpac-accountable/>.

The Association of Art Museum Directors (AAMD), established in 1916, is a professional organization of approximately 240 directors of major art museums throughout the United States, Canada, and Mexico. The purpose of the AAMD is to support its members in increasing the contribution of art museums to society. The AAMD accomplishes this mission by establishing and maintaining the highest standards of professional practice, serving as a forum for the exchange of information and ideas, acting as an advocate for its member art museums, and being a leader in shaping public discourse about the arts community and the role of art in society.