

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

IN THE MATTER OF AN INVESTIGATION INTO
LOOTED GREEK AND ROMAN ANTIQUITIES

WHEREAS, pursuant to a criminal investigation conducted by the District Attorney of the County of New York (“DANY”), DANY has concluded that the antiquities listed in Exhibit 1 (“**Antiquities**”) were stolen from their respective countries of origin and, therefore, constitute stolen property under New York law; and

WHEREAS, DANY has evidence sufficient for the issuance of a judicially authorized search warrant pursuant to N.Y. Criminal Procedure Law § 690 et seq., and Michael Ward, having been presented through his attorney with a portion of the evidence concerning the **Antiquities** that he received on consignment and over which it appears he had no ownership interest, waived such warrant and any ownership interest that might have existed by operation of law or otherwise—however limited that interest may be—in the **Antiquities**, all of which were seized by DANY and the U.S. Department of Homeland Security-Homeland Security Investigations (HSI) on September 5, 2023;

IT IS HEREBY STIPULATED AND AGREED AS FOLLOWS:

1. Michael Ward represents that he is authorized to enter this agreement, has read and fully understands this agreement, and is agreeing to its terms freely, knowingly, and voluntarily;

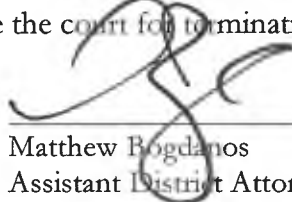
2. Michael Ward affirms that neither he, nor his successors, assigns, or agents will make any claims under federal law, New York state law, or any other state’s law to the **Antiquities**; that he will not object to their further disposition by the New York State Supreme Court and/or DANY; that he waives any claim against DANY, HSI, or any of their employees or agents arising out of the seizure, retention, and disposition of the **Antiquities**;

3. DANY represents that the **Antiquities** shall be disposed of by DANY in accordance with N.Y. Penal Law § 450.10 by repatriating the **Antiquities** to their respective lawful owners, i.e., the countries of Italy, Greece, and Türkiye;

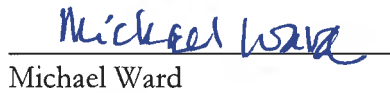
4. Michael Ward affirms that he will plead guilty in open court to Criminal Facilitation in the Fourth Degree (N.Y. Penal Law §115.00[1]), a class A misdemeanor, and will allocute as described in Exhibit 2 (“Plea Statement”) with a promised sentence of a conditional discharge for a period of one year pursuant to N.Y. Penal Law §65.05, the conditions of which are that he will surrender additional antiquities, if any, that he or DANY identifies in his possession that were sold, consigned, or previously possessed by Eugene Alexander; and that he will cooperate truthfully and fully with DANY and, if requested by DANY and with DANY’s coordination, he will assist Italy and Germany in their investigation and prosecution of Eugene Alexander; and

5. In return, DANY affirms that it will not pursue any additional charges or arrests of Michael Ward for any crimes arising from his antiquities dealings or business transactions with Eugene Alexander; that Michael Ward will not be prosecuted in Italy for any crimes arising from his antiquities dealings or business transactions with Eugene Alexander; that no evidence developed by DANY or provided by Michael Ward to DANY will be used for any prosecution in Germany

or any other country; that, although Michael Ward's antiquities dealing and business transactions with Eugene Alexander will be described in any charging documents of Eugene Alexander, Michael Ward will not be named as a co-conspirator; and that at the expiration of one year, DANY will move the court for termination of the conditional discharge.


Matthew Bogdanos
Assistant District Attorney

Dated: 9/6/23


Michael Ward

Dated: 9/6/23

Exhibit 1: Antiquities

#	Name	Country	Value
1	Gilded bronze plaque with satyr	Italy	4,000,000
2	Gilded bronze plaque with maenad & tambourine	Italy	4,000,000
3	Gilded bronze plaque with maenad & deer haunch	Italy	4,000,000
4	Silver cup with centaur	Italy	1,500,000
5	Alabaster amphora	Italy	20,000
6	Alabaster statuette of Aphrodite	Italy	30,000
7	Bronze figure of a togate man	Italy	1,500,000
8	Bronze fibula with two Pan figures	Italy	75,000
9	Bronze Hellenistic male head	Italy	2,000,000
10	Bronze Late Antique male head	Italy	750,000
11	Breastplate from a cuirass	Italy	85,000
12	Bronze statuette of a youth	Italy	60,000
13	Bronze candelabra with Silenus and tree	Italy	150,000
14	Fragment of a Roman fresco with female figure	Italy	250,000
15	Fragment of a Roman fresco with garden scene	Italy	250,000
16	Sculpture of a dog carved from breccia	Italy	45,000
17	Attic helmet (with rosettes)	Greece	120,000
18	Attic helmet (with rosettes)	Greece	120,000
19	Attic helmet	Greece	120,000
20	Attic helmet	Greece	120,000
21	Attic helmet	Greece	120,000
22	Chalcidian helmet	Greece	120,000
23	Corinthian helmet	Greece	120,000
24	Bronze chariot attachment	Greece	50,000
25	Cycladic marble head (12 x 9 cm)	Greece	40,000
26	Cycladic marble head (18 x 9 cm)	Greece	10,000
27	Cycladic marble torso	Greece	30,000
28	Kamarea ware cup	Greece	15,000
29	Mycenaean vase with three handles	Greece	20,000
30	Cuirass in two parts	Greece	75,000
31	Iron cuirass in two parts	Greece	100,000
32	Breastplate from a cuirass	Greece	100,000
33	Iron breastplate	Greece	100,000
34	Byzantine silver plate	Greece	400,000
35	Silver icon with Virgin	Greece	15,000
36	Silver statuette of Cybele	Turkey	300,000
37	Phrygian bronze helmet	Turkey	75,000
38	Phrygian bronze helmet with attached cheekpieces	Turkey	175,000
39	Bronze foot from a male statue	Turkey	17,000
40	Bronze right hand from a male statue	Turkey	20,000

Exhibit 2: Plea Statement

Since 1982, I have owned and operated Ward and Co. Works of Art, LLC, a business based in New York City that buys and sells antiquities. As such, I am familiar with regulations and laws related to antiquities in the State of New York and elsewhere. I began doing business with Eugene Alexander in the late 1990s, and since then I have purchased or taken on consignment from Alexander many antiquities worth many millions of dollars through Ward and Co. Works of Art, LLC. There were also many antiquities that he offered me for purchase or consignment that I rejected either because I was not satisfied with the provenance or I was not interested in the object.

In meetings my lawyer and I have had with the prosecutor over the past months, I have been convinced that Mr. Alexander was trading in antiquities that had been illegally removed from their countries and had provided me with provenances for antiquities that were not accurate. I was shocked by the compelling evidence so indicating. I was not previously aware of it. Among those were numerous antiquities I accepted on consignment from Eugene Alexander containing provenance such as “ex Geneva private collection, acquired in the early 1990s” that Alexander claimed to have originated from Turkey, Italy, or Greece, but which lacked any provenance documentation showing that they left their respective country of origin legally.

I also have been advised by the prosecution that Mr. Alexander was involved in money laundering. From 2017 to 2019, Mr. Alexander asked me to sign certain documents, which I signed and provided to him. Those documents contained information that was not accurate. The following are the documents that I signed at Mr. Alexander’s request that contain information that was not accurate:

- On July 30, 2017, I signed a document with Eugene Alexander, indicating that I received on consignment from Alexander 89 antiquities valued at \$20,506,000. I did not receive all these antiquities.
- On October 30, 2018, I signed a document with Eugene Alexander, indicating that I received on consignment from Alexander 82 antiquities valued at over \$27 million. I did not receive all these antiquities.
- On January 10, 2019, I signed a blank form provided to me by Eugene Alexander that I understood at the time would be used to list future consignments or commissions. I later learned that on April 1, 2019, Alexander used that blank schedule to prepare and sign a document indicating he had sold me 63 antiquities for \$29, 219, 922.67.
- There is a document dated January 25, 2019, that is on my letterhead with my signature indicating that I owed Alexander \$4,075,000. I am certain I did not sign that document, but I agree it is my signature.

Although I did not know at the time that Eugene Alexander was engaged in illegal money laundering, nor did I know that I was in fact aiding Eugene Alexander in such illegal

Exhibit 2: Plea Statement

conduct, I knew or should have known that these documents were inaccurate when I signed them and that it was, therefore, probable that I was aiding Eugene Alexander in concealing or disguising the proceeds of criminal conduct.