

**Recommendation by the committee appointed by decision of the
College of Mayor and Aldermen of the City of Ghent of November 28,
2024 with regard to the restitution claim of the painting:**

“Portrait of Bishop Antoon Triest”

**attributed to Gaspar de Crayer (Ghent Museum of Fine Arts, inv. nr.
1948-Z),**

by the heirs of Samuel Hartveld

Ghent, September 26, 2025

Note: *This English version is a mere translation of the original, and only authentic, Dutch text. (Translated by Amber Gardeyn and Georges Martyn.)*

Members of the Committee: Michel Ceuterick, Jacques Lust, Georges Martyn
Scientific support: Amber Gardeyn

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1. Introduction: Mandate

The Committee, composed of Michel Ceuterick, Jacques Lust and Georges Martyn, with scientific support from Amber Gardeyn, has taken note of the restitution claim dated 3 October 2023, submitted by attorney [REDACTED] (Themis [REDACTED] Rechtsanwalts, Munich) on behalf of the Sonia Klein Trust (successor to Samuel Hartveld (1878–1949), see 4.1), concerning the painting “Portrait of Bishop Antoon Triest”, attributed to Gaspar de Crayer, which forms part of the collection of the Museum of Fine Arts of Ghent, as well as the accompanying documentation (Exhibit 42 – 20231003).

In accordance with Article 2 of the mandate decision (Exhibit 43 – 20241128), the Committee proceeded to “gather the relevant facts and examine them, both through its own investigation and based on contacts with various parties, and on the basis of a legal and historical assessment, taking into account the international context”, in order to “provide a substantiated recommendation regarding the position to be adopted by the City of Ghent in response to the restitution claim of the heirs of the late Samuel Hartveld”.

At each meeting, for the evaluation of submitted evidence and for decisions regarding possible further investigative assignments, unanimity among the voting members was consistently pursued, in accordance with Article 5 of the appointment decision. The following reasoning and concluding advice were unanimously adopted by the Committee.

Due to delays resulting from awaiting permissions to access certain archives, the Committee requested an extension of the original appointment term (until 1 June 2025), and by decision of the College of Mayor and Aldermen dated 19 June 2025, the deadline for submitting the advice was postponed to 30 September 2025 (Exhibit 47 – 20250619); additionally, the same decision granted permission to seek expert opinions from two forensic handwriting experts regarding the potentially forged nature of a document relevant to the investigation (see section 6.3.2.2, letter dated 5 July 1945 from Samuel Hartveld to René Van de Broek).

The Committee convened on 20 January, 3 March, 5 May, 5 June, 4 July, 12 August, 16 and 26 September 2025. The minutes of these meetings are considered confidential internal working documents containing preliminary hypotheses, evolving viewpoints and assessments of the progress of the investigation, and are not disclosed to the public, as their publication would infringe upon the Committee’s deliberative confidentiality and the privacy of its members.

During the course of the investigation, an additional claimant came forward. In a letter dated 21 August 2025, the London law firm Mishcon de Reya, acting on behalf of their client [REDACTED] (see section 4.1 regarding family history), stated that – despite being a trustee – he was not involved in the aforementioned claim of the Sonia Klein Trust and that the original claim therefore cannot be considered to represent “the” (i.e. all)

heirs of Samuel Hartveld. [REDACTED] asserts a “shared interest” and requests that his rights be taken into account (Exhibit 48 – 20250821).

What follows, after the description and provenance of the disputed painting, is an outline of the assessment framework (legal and ethical considerations) that guided the Committee. Subsequently, the legitimacy of the claimants as legal successors of Samuel Hartveld is examined. Finally, the validity of the claim is assessed, and after reviewing the many and often debatable pieces of evidence, the Committee concludes what it considers to be the just and fair solution in this case.

2. The Painting and its Provenance

“Portrait of Bishop Antoon Triest” is an oil on canvas measuring 229 cm in height and 165 cm in width, unsigned and undated, but attributed to Gaspar de Crayer (Antwerp 1584 – Ghent 1669) since 1967 and situated in the period 1627–1630. It is inventory number 1948-Z of the collection of the Museum of Fine Arts Ghent (MSK). The painting was purchased by the City of Ghent in December 1948, after being exhibited for a period of six months in the then Bijloke Museum (now STAM). Even after the purchase, the work presumably remained publicly accessible as part of the permanent exhibition of the Bijloke Museum. It is certain that since the restoration and reopening of the Bijloke Museum as STAM in 2005, it has no longer been part of the permanent collection on display and has since been kept in the STAM depot. The work was further exhibited in exhibitions in 1956 (Scaldis, Saint Peter’s Abbey Ghent), 1974 (*1000 jaar Ekkergem* (1000 Years of Ekkergem), Antiquities Museum Ghent), 1976 (*400ste verjaardag van de geboorte van Bisschop Triest* (400th Anniversary of the Birth of Bishop Triest), Saint Bavo Cathedral Ghent), 1977 (*Herdenking geboorte Antonius Triest* (Commemoration of the Birth of Antonius Triest), Cortewalle Castle Beveren), and 2003 (*Krijg en Kunst: Leopold Willem, Habsburger, landvoogd en verzamelaar* (War and Art: Leopold Wilhelm, Habsburg, Governor and Collector), Alden Biesen Bilzen). In June 2018, it was transferred to the Museum of Fine Arts for a small collection exhibition on *Gaspar de Crayer en Gent: Onlosmakelijk verbonden* (Gaspar de Crayer and Ghent: Inextricably Linked), on the occasion of a major retrospective exhibition of De Crayer in Musée de Flandre Cassel. After this presentation, the portrait remained in the MSK depot, where it is still located today (information from the Axiell registration database of STAM and MSK). The exhibition history of the portrait indicates its rather regional value. The portrait was not primarily displayed for its intrinsic artistic qualities, but rather to give a face to the historical figure of Bishop Antoon Triest, who, as an art patron, gave a significant artistic impulse to seventeenth-century Ghent.

The subject of the portrait is the art-loving Antonius Triest (1577–1657), Bishop of Ghent, appointed in 1620 and serving for over 35 years. He acquired numerous artworks from, among others, Peter Paul Rubens (1577–1640), Anthony van Dyck (1599–1641), and Gaspar de Crayer, primarily intended for the enriching of the Saint Bavo Cathedral.

According to the museum file (Ghent, Museum of Fine Arts, inv. no. 1948-Z), the City of Ghent purchased the work from art dealer René Van de Broek (at that time trading under the name 'Galerij Otto Venius' located at Otto Veniusstraat 3 in Antwerp) by decision of the College of Mayor and Aldermen dated 28 December 1948 (document 23 - 19481228). At that time, the city acted in good faith (see 3.2).

According to the catalogue *Museum voor Schone Kunsten Gent: Catalogus schilderkunst, Deel 1 (14de-18de eeuw)* (Ghent, Museum of Fine Arts, 2007, p. 73), the painting belonged to the collection of Sir Kenneth Matheson (Duncraig Castle, Plockton) before 1927 and was then attributed to Anthony van Dyck (1599–1641). It was subsequently auctioned by Willis's Rooms in London on 27 October 1927 (lot no. 20). The buyer was Antwerp art dealer Samuel Hartveld. At that time, the work was attributed to Cornelis de Vos (1584–1651). Hartveld was very active as an art dealer in Great Britain.

That the work temporarily ended up in an English private collection is not surprising – Flemish Baroque art was highly appreciated by English collectors – and is mainly due to the confiscations and sales under French rule (1795–1815), which led to the disappearance of many ecclesiastical artworks, including from Ghent. The "Portrait of Bishop Antoon Triest" by Gaspar de Crayer, however, was not looted and taken to France by the French (see Charles Piot, *Rapport à Mr. le Ministre de l'Intérieur sur les tableaux enlevés à la Belgique en 1794 et restitués en 1815*, Brussels, General State Archives, 1996; Pierre-Yves Kairis, *Nouveaux regards sur les saisies patrimoniales en Europe à l'époque de la Révolution française*, Turnhout, Brepols-KIK, 2020).

In 1927–1928, the work was in the possession of Hartveld, but in 1929 it is listed as part of the collection of G. Neumans (Brussels), now attributed to Peter Paul Rubens. As a work by Rubens, it was subsequently auctioned during a public sale of the Chasles collection by Galerie Fiévez in Brussels on 16 December 1929 (lot no. 79).

In 1937, the work is again listed as part of the collection of Samuel Hartveld.

The Jewish art dealer Samuel Hartveld fled Belgium in May 1940, reached the United States via Portugal, and left this painting, along with 65 others (see further), behind in his gallery at Otto Veniusstraat 3 in Antwerp.

During the war, the German occupier appointed a *Verwalter* over the gallery (see further for specific dates). The *Verwaltung* was a form of (temporary) sequestration, but with authority – granted by the German authorities – for the *Verwalter* to proceed with the sale thereof. The *Verwalter* indeed sold the entire art collection of the Hartveld gallery to René

Van de Broek (see further). As a result, ownership of the paintings was transferred from Samuel Hartveld to René Van de Broek through spoliation by the occupier.

The painting “Portrait of Bishop Antoon Triest”, then attributed to Gerard Seghers (1591–1651), was acquired by the City of Ghent in 1948, one year before the death of Samuel Hartveld, from René Van de Broek for 50,000 BEF (Exhibit 23 - 19481228).

The painting had already been offered by René Van de Broek to the Bijloke Museum on 3 April 1943. When Van de Broek contacted the museum again in 1948, he proposed a long-term loan, namely for a six-month exhibition from 1 July 1948 to 1 January 1949. The work was indeed exhibited in the Bijloke Museum, and during those months, the price was the main subject of discussion. The Museum Commission of the Museum of Fine Arts advised positively on the purchase on 24 December 1948.

As this provenance history *prima facie* indicates that the work is spoliated property and there is no clear evidence that the despoiled was already compensated, the question of restitution in 2025 is self-evident, if the *Washington Principles on Nazi-Confiscated Art* are applied and there is indeed no evidence of prior compensation.

The Commission’s task includes mapping the precise course of events during and after the war to arrive at a more complete picture of the facts and to formulate a recommendation regarding the restitution claim. The factual account submitted by attorney [REDACTED] focuses mainly on the pre-war and wartime years. The post-war period of possible legal redress is addressed in only one sentence (see further).

3. Legal and Ethical Framework

3.1. Applicable Law

First and foremost, it must be determined which law would apply to the restitution of a painting currently in the possession of a Belgian legal entity. The Belgian Code of Private International Law (*Wetboek Internationaal Privaatrecht*) provides the following:

Art. 87. § 1. Real rights in respect of a good are governed by the law of the State on whose territory the good is located at the time such rights are invoked. The acquisition and loss of such rights are governed by the law of the State on whose territory the good is located at the time the acts or facts invoked as grounds for the acquisition or loss of those rights occur.

This general provision must, in the present case, be supplemented by Article 92 of the Belgian Code of Private International Law, which designates the applicable law in disputes concerning the restitution of stolen goods. The painting in question, along with 65 other paintings, was placed under *Verwaltung* by the occupying forces. This

constitutes a clear act of (legal) spoliation, rendering Article 92 applicable to the underlying claim. Although this advisory report will demonstrate that the paintings were not physically removed from the original owner (commonly referred to as “looted art”), Samuel Hartveld was nevertheless legally dispossessed of his property by the occupying authority.

Art. 92: The restitution of a stolen good is governed, at the discretion of the original owner, either by the law of the State on whose territory the good was located at the time of its disappearance, or by the law of the State on whose territory the good is located at the time of restitution.

Nevertheless, if the law of the State on whose territory the good was located at the time of its disappearance does not grant any protection to the *bona fide* possessor, the latter may invoke the protection afforded by the law of the State on whose territory the good is located at the time of restitution.

Consequently, the applicable law is either that of the country where the good was spoliated or that of the country where the good is currently located. The choice of legal system is entrusted by the legislator to the original owner (in this case: the heirs). However, this right of choice is redundant here, as both options lead to the application of Belgian law.

3.2. Legal Framework: Belgian Law

When the present restitution claim is examined from a positive law perspective, it becomes readily apparent that, under Belgian law, no strictly legal possibility for restitution remains available. Although the Civil Code (*Burgerlijk Wetboek*) in force at the time of the events during the Second World War (the old or Napoleonic Civil Code), insofar as it concerns property law, has since been replaced by the new provisions of Book 3 of the (new) Civil Code, the underlying legal principles have not changed. The essential provisions are:

Article 2279 of the Old Civil Code, now Article 3.24 of the Civil Code: Enhanced evidentiary function for movable goods: The bona fide possessor of a real right in movable goods is presumed to hold a valid title, subject to rebuttal.

Article 2280 of the Old Civil Code, now Article 3.28 of the Civil Code: Immediate acquisition in good faith of movable goods

§ 1. A person who, under a burdensome title and in good faith, acquires a real right in a movable good from someone who was not authorized to dispose of it, becomes the holder of that right as soon as he acquires undisturbed and unequivocal possession.

However, the holder of a real right who has lost a movable good or from whom a movable good has been stolen may reclaim that good from the possessor referred to in the first paragraph within a limitation period of three years from the date of the loss or theft; this right of reclamation does not apply to legal payment instruments.

When the City of Ghent purchased the painting by René Van de Broek in 1948, it did so “in good faith,” a concept that must be interpreted according to the standards of 1948. The City was not aware, nor should it have been aware, that the painting was a spoliated good. It follows that the City of Ghent acquired a valid title of ownership. The original owner could only reclaim the painting within three years following the initial act of spoliation. Therefore, the restitution claim would be rejected by the Belgian courts.

3.3. International Guidelines

During the 1990s, public opinion increasingly embraced the view that a new round of restorative legal measures was necessary to address the historical injustices committed during the Second World War. One of the most prominent manifestations of this shift was the adoption of the Washington Conference Principles on Nazi-Confiscated Art, an international soft law instrument signed by 44 states, including Belgium, during the Washington Conference on Holocaust Era Assets held in December 1998 (<https://www.state.gov/washington-conference-principles-on-nazi-confiscated-art/>).

The eleven principles agreed upon at that conference provide a framework for states to develop national policy regarding property confiscated by the Nazis. These Washington Principles are structured around three pillars: (1) provenance research, (2) accessibility of research documentation and archives, and (3) resolution of ownership disputes.

More specifically, the principles call for the proactive identification of looted artworks and their pre-war owners (Principle 1). In conducting such research and determining whether an item was looted, investigators must take into account the inevitable ambiguities and gaps in provenance that result from the passage of time and the circumstances of the Holocaust and its aftermath (Principle 4). The outcomes of provenance research must be published in a central registry (Principles 5 and 6).

Where the pre-war owner of a looted artwork can be identified, states are required to provide a just and fair solution, which may take various forms depending on the circumstances and facts of the specific case (Principle 8). Committees responsible for issuing decisions or recommendations must be composed in a balanced manner (Principle 10). Finally, states are encouraged to adopt national implementation measures, particularly with regard to alternative dispute resolution mechanisms for ownership disputes (Principle 11).

Following the Washington Conference, two further international meetings were held: the Vilnius Forum in 2000 (<https://www.lootedartcommission.com/vilnius-forum>) and the Terezin Declaration in 2009 (<https://www.lootedartcommission.com/NPNMG48464>). In both soft law instruments, the participating states reaffirmed their commitment to the Washington Principles without introducing new provisions.

In 2024, on the occasion of the 25th anniversary of the Washington Principles, a follow-up was issued in the form of fifteen “Best Practices” (<https://www.state.gov/office-of-the-special-envoy-for-holocaust-issues/best-practices-for-the-washington-conference-principles-on-nazi-confiscated-art>). These contain, on the one hand, terminological clarifications regarding the scope of the principles, and on the other, interpretative guidelines intended to assist states in developing or refining responsible policies concerning Nazi-spoliated cultural property.

Of particular relevance to the present case is the fact that, according to the Best Practices, restitution is promoted as the primary just and fair solution. Other remedies remain possible where circumstances and underlying facts warrant them. The just and fair nature of a solution must be assessed primarily from the perspective of the pre-war despoiled people and their rightful heirs. Furthermore, states are expected to set aside legal rules that obstruct restitution. These include, for example, statutes of limitation, acquisitive prescription, the inalienability of public property, and the excessive protection of *bona fide* purchasers. States are also encouraged to establish independent expert bodies (restitution committees) — as already exist in Germany, France, the Netherlands, Austria, and the United Kingdom — that may issue binding decisions or non-binding recommendations on ownership matters. Alternative dispute resolution mechanisms are recommended. These committees must operate transparently in their procedures, decision-making, and published rulings.

The Commission has been guided by these principles throughout its investigation and decision-making process, consistently taking into account these international guidelines.

3.4. Framework of Reference in European Restitution Committees

In developing an assessment framework for the Ghent Commission, attention was not only paid to international soft law instruments, but also to the functioning and research findings of existing restitution committees. From this exercise, several common policy guidelines can be derived.

When heirs submit a restitution claim for a particular cultural object, several initial matters must be verified. Attention is first directed to the claimants. Given the passage of time, claims almost always originate from the heirs of the pre-war owner of the potentially spoliated cultural object. Consequently, the claimant must be legally entitled as an heir of the original owner. All such heirs must be given the opportunity to participate

in the claim. Next, it must be verified whether the claimed cultural object corresponds to the object that was originally spoliated from the deceased. It is also self-evident that the party against whom the claim is made must be the current possessor or owner of the cultural object.

Only once these preliminary steps have been completed can the substantive investigation begin. This investigation must be divided into two phases. First, it must be determined whether the case at hand involves spoliation. This term must be interpreted broadly, in accordance with the Washington Principles and the related Best Practices. Not only direct looting, but also forced sales, confiscations, and similar acts may be considered acts of spoliation. Where it can reasonably be assumed that spoliation occurred, a restorative measure (a just and fair solution) must be attached to it.

An important note in this regard is that once spoliation is established, a second investigation must follow to determine whether restorative measures have already been taken that would render the current claim a case of double compensation.

Ideally, this investigation into spoliation and post-war compensation should be conducted by an independent research body that prepares a report of its findings and submits it to the restitution committee.

The restitution committee may then, based on the research report, issue a decision or provide a recommendation to the competent authority. Where necessary, committee members are free to request additional investigative actions, hear the parties involved, seek expert opinions, etc. Although not all European restitution committees follow this practice, it is recommended that decisions or recommendations be made public along with the research report. Transparency is therefore one of the core values. In connection with this, it is also important to make the decision or recommendation accessible to as many stakeholders as possible, for example by providing a translation into a more accessible language alongside the original text.

3.5. Framework of Reference of the Ghent Committee

The present Commission was appointed by resolution of the College of Mayor and Aldermen of the City of Ghent and is tasked with providing advice on what constitutes a just and fair response to the restitution claim in question. The Commission has acted entirely independently and is composed of experts from the fields of art, history, law, and administration, and was supported by a doctoral researcher specialized in the issue of Nazi-spoliated art.

This report and all supporting archival documents (with the exception of the prosecutorial investigation by the Military Audit Office (*Krijgsauditoraat/Auditorat militaire*) concerning René Van de Broek, for which only the Commission was granted access) are published with a view to ensuring maximum transparency.

As previously mentioned, the Commission has been guided by the Washington Principles and their accompanying declarations and interpretations, and comparisons have been made with internationally available cases. During the course of this investigation, the Flemish government also took the initiative to establish a study committee tasked with preparing a future Flemish restitution framework, in view of the possible establishment of a Flemish restitution committee. Unfortunately, the report of the study committee appointed by the Flemish Minister of Culture was not yet available at the time of the conclusion of the Ghent Commission's work.

During the Commission's investigation, a substantial number of documents were collected that provide a clearer picture of the facts during and after the war and supplement previously conducted research. Nevertheless, it cannot be asserted that all evidence for all relevant facts is currently available (in part due to the limited six-month timeframe within which the Commission operated), and thus a complete reconstruction of the factual and legal actions of all involved parties cannot be definitively achieved. In accordance with the Washington Principles, it must be assumed that complete proof is unattainable and that, in cases of doubt, judgment must favour the despoiled party.

With regard to the evidentiary standard, the rules of positive law on evidence cannot be applied. Explicit written evidence is too often lacking, and testimonies are excluded due to the long passage of time. This means that the Commission must primarily rely on cumulative factual presumptions, which can only be accepted as evidence if they are numerous, serious, and consistent, and thereby eliminate any doubt among the Commission members.

Although the evidentiary standard for a dealer such as Samuel Hartveld can be put somewhat higher with respect to pre-war ownership and involuntary loss of possession than for a private individual, there is no doubt whatsoever regarding both aspects in the present case. Ownership of the painting in question is manifest, and the appointment of a *Verwalter* constitutes confiscation and thus spoliation of that ownership.

Since pre-war ownership and spoliation have been proven, the Commission was only required to determine whether compensation for the spoliation had already occurred. To that end, research was conducted primarily in national and international restitution archives from the post-World War II period. If Samuel Hartveld himself during his lifetime, or his heirs, had already been compensated for the spoliation of the painting in question, the correct response to the restitution claim would be its rejection, as double compensation is not permissible. Nevertheless, the possibility remains to provide moral reparation for the financially compensated loss, for example by contextualizing the spoliation on the museum's website or during a temporary exhibition of the artwork.

4. The Claiming parties

4.1. Family History and Succession

The original restitution request was submitted by attorney [REDACTED] on behalf of the Sonia Klein Trust and [REDACTED] and [REDACTED] grandchildren of Sonia Klein (and trustees/beneficiaries of the trust). Sonia (also known as Sophia) Klein was the daughter of Samuel Hartveld (1878–1949).

Samuel Hartveld was an art dealer in Antwerp from the 1920s onward. During the 1930s, he became one of the few antique dealers in Antwerp specializing in old master paintings, exhibiting works from the sixteenth and seventeenth centuries at numerous city exhibitions. On 10 May 1940, he fled Antwerp with his second wife [REDACTED], obtained a visa in Bordeaux on 31 May, and departed Lisbon on 15 August aboard the ship *Exeter* bound for New York (evidence provided by the claimants, based on Geert Sels', *Kunst voor Das Reich*, Lannoo, 2022). He established his official residence in New York and founded an art dealership there.

Samuel Hartveld was first married to [REDACTED]. During this marriage, two children were born: [REDACTED] [REDACTED]. After [REDACTED] death, Samuel Hartveld remarried [REDACTED]. During this second marriage, two children were born: Sonia Hartveld (1908–1997) and [REDACTED]. [REDACTED], then working as a trainee lawyer in Brussels, was arrested by the occupying forces on 21 January 1941 on suspicion of resistance activities, and he was executed on 21 January 1942 at the National Shooting Range in Schaerbeek (document 39 – 19541012). Post-war archives indicate uncertainty regarding his resistance activities; there were indications that he intended to flee to England after the Nazi occupation.

Sonia Hartveld was first married to [REDACTED], then [REDACTED], and finally to Klein, which is why she was known in her later years as Sonia (often “Sophia”) Klein. From her first marriage, one daughter was born, [REDACTED], who married [REDACTED]. During this marriage, three children were born: [REDACTED]
[REDACTED]

In 1986, Sonia Klein established a trust for her entire estate, with her three grandchildren as the ultimate beneficiaries. She passed away in 1997.

The submitted claim originates from both the Sonia Klein Trust and two of the three grandchildren (who are also beneficiaries and trustees of the Sonia Klein Trust). Under the trust’s statutes, two trustees may bind the trust and thus authorize legal counsel to submit a claim concerning Sonia Klein’s estate. The original claim, formulated by [REDACTED], is therefore admissible.

However, by letter dated 21 August 2025, the law firm Mishcon de Reya, acting on behalf of [REDACTED], the third grandchild of Sonia Klein, stated that their client was unaware of the original claim submitted on behalf of the trust or on behalf of “the” (i.e., “all”) heirs of Samuel Hartveld. [REDACTED] was not involved in the trust’s decision, despite being a “beneficiary and trustee.” He therefore requested to be kept informed of the claim proceedings and to have his interest in restitution or compensation acknowledged. The Commission also considers this claim admissible.

The Sonia Klein Trust and the three Klein grandchildren may be regarded as the legal successors of Samuel Hartveld. Any decision regarding restitution or compensation must take into account the interests of all three grandchildren.

According to his will dated 19 April 1949 (document 24 – 19490419), Samuel Hartveld’s entire estate passed upon his death (on 1 September 1949) to his wife [REDACTED] as universal legatee, except for three specific bequests of 3,000 USD to each of his children: [REDACTED] from his first marriage, and surviving daughter Sonia from his second marriage. Upon the death of the surviving spouse, [REDACTED], on 23 May 1951, her only daughter, Sonia Klein, became her sole heir.

Following Samuel Hartveld’s death, his inheritance — at least in Belgium — was contested. Son [REDACTED] from the first marriage filed a claim before the Antwerp Court of First Instance against his stepmother [REDACTED], his sister [REDACTED] ([REDACTED]), and his half-sister Sonia Hartveld (and her husband [REDACTED]). He claimed his (under Belgian law) statutory share in the Belgian real estate (Otto Veniusstraat 3), as well as the application of Article 4 of the Act of 27 April 1865. This provision allowed Belgian heirs to claim a “*vooruitneming*” (preferential share) in the Belgian-located (movable and immovable) assets of the deceased, to the extent that the application of foreign law (in this case, New York law) would exclude the Belgian heir from the statutory inheritance rights that would apply under Belgian law (which, in this case, would entitle [REDACTED] to a reserved share of one-quarter of the entire estate). By judgment of 16 June 1950, public notaries Frédéric Deckers and Gerard Geudens were appointed to prepare the liquidation and partition of Samuel Hartveld’s estate (document 29 – 19500616). The notaries were instructed to prepare a complete inventory, liquidate the Belgian assets, and draft a partition plan (applying the preferential share under the 1865 Act).

The notarial proceedings took considerable time. On 14 March 1951 and 10 May 1951, the American estate inventory and declaration of succession were submitted to the acting notaries (document 31 – 19510314). Subsequently, the real estate at Otto Veniusstraat was sold at public auction (document 33 – 19510524). The Antwerp paintings and furniture were auctioned (documents 32 – 19510521 and 35 – 19510710), following an earlier auction of several paintings in New York (document 30 – 19501115). On 13 June 1951, the estate inventory was finalized (document 34 – 19510613).

For the valuation of the movable assets, Jean-Pierre Van Goidsenhoven was engaged for the artworks, and John Simons for the furniture, books, silverware, and porcelain. Van Goidsenhoven stated: *“en vue de son expertise, il s’est mis en rapport avec Monsieur René Van de Broek, marchand de tableaux, demeurant à Bruxelles, Boulevard de Waterloo, 9a, qui a rassemblé tous les tableaux et objets qu’il avait en consignation pour compte de feu Monsieur Samuel Hartveld et appartenant à ce dernier pour la totalité ou pour partie ainsi qu’il sera déclaré ci-après”* (“for the purpose of his appraisal, he contacted Mr. René Van de Broek, art dealer, residing in Brussels, Boulevard de Waterloo, 9a, who gathered all paintings and objects he held on consignment for the account of the late Mr. Samuel Hartveld and which belonged to the latter in whole or in part, as will be declared below”). Van de Broek further declared that he was co-owner of certain paintings and had sold others prior to the inventory, receiving the price he had agreed upon with Samuel Hartveld. Van de Broek made his declarations under oath, and Mrs. [REDACTED] concierge of Otto Veniusstraat 3, confirmed the facts.

Attorney Paul Speyer, acting for the heir [REDACTED], made a general reservation regarding the submitted documents and the statements of René Van de Broek. However, at a subsequent meeting, he withdrew this reservation, which indicates that the statements were most likely correct. Paul Speyer was not only counsel to [REDACTED] but had also represented Samuel Hartveld during his lifetime. (The file concerning the recognition of [REDACTED] as a political prisoner, and the resulting financial compensation to the heirs of Samuel Hartveld and [REDACTED], was also handled by Mr. Paul Speyer (document 39 – 19541012), as evidenced by his letter dated 12 October 1954 to the payment office of the Ministry of Finance. In the letter, the attorney requested that the pension awarded to [REDACTED] be paid to the acting notaries Geudens and Deckers. He wrote that an amicable settlement among the heirs was not possible: *“Une des héritières s’est toujours montrée récalcitrante et il est exclu qu’elle donne jamais procuration. [...] Les notaires ont bloqué à la Caisse des Consignations les fonds revenant à l’héritière dont question ci-dessus”* (One of the heirs has always been recalcitrant and it is out of the question that she will ever grant a power of attorney. [...] The notaries have deposited the funds due to the heir in question with the Caisse des Consignations”).)

4.2. The Immovable Estate in Belgium

The will of Samuel Hartveld could not be fully executed, at least insofar as Belgium is concerned, because Belgian law (*lex rei sitae*) applied to part of the estate, specifically the immovable property located at Otto Veniusstraat 3 in Antwerp. This property was subject to the Belgian inheritance law in force at the time, which, in the case of three children, recognized only one quarter of the estate as the disposable portion and allocated a reserved one-quarter share to each of the three children.

According to the declaration of the *Kantoor Rechtszekerheid* (Office of Legal Certainty) Antwerp 1, the ownership history of the building at Otto Veniusstraat 3 is as follows (document 45 – 20250331):

- Otto Veniusstraat 3 was purchased by spouses Hartveld- [REDACTED] on 21 March 1927. They constructed the existing building, which included a gallery and auction hall on the ground floor and four floors of apartments above.
- Upon the death of Samuel Hartveld on 1 September 1949, one undivided half of the ownership rights was allocated to the surviving spouse, and the other half, pursuant to the aforementioned Belgian inheritance law, was divided among the three children and the surviving spouse. [REDACTED] thus held 5/8 undivided ownership, while [REDACTED] and Sonia each held 1/8.
- Upon [REDACTED] death on 23 May 1951, her undivided share passed entirely to her only surviving daughter. At that point, Sonia Hartveld held 6/8, and [REDACTED] each held 1/8.

At the time of the declaration of succession for the [REDACTED] estate, the declaration for the Hartveld estate was also submitted. Only immovable property was declared: for Hartveld, valued at 990,000 BEF in 1949, and for [REDACTED], valued at 1,237,500 BEF in 1951 (see document 36 – 19510926).

- Following the auction in the framework of the liquidation-partition, the undivided property was sold to [REDACTED] on 7 June 1951.

If Samuel Hartveld's painting collection were also to devolve under Belgian law, then (the heirs of) [REDACTED] Hartveld might likewise be entitled to a (partial) compensation claim, as successors of Samuel Hartveld. *Prima facie*, this appears to be the case. Samuel Hartveld was a professional art dealer who used the building at Otto Veniusstraat as a gallery, salesroom, and restoration space. It was also his official residence. According to the then-applicable Article 524 of the Old Civil Code: "*Voorwerpen die de eigenaar van een erf voor de dienst en de exploitatie van dat erf daarop geplaatst heeft, zijn onroerend door bestemming* (Objects placed by the owner on a property for the service and operation of that property are immovable by destination".

However, since the painting collection was confiscated and sold by the occupying forces — albeit perhaps in a voidable manner, but never declared null and void by a court — a separation had occurred between the painting collection and the immovable property at the time of death.

The paintings must therefore be considered movable property, and different private international law connecting factors apply (see legal framework).

4.3. The Movable (and Entire) Estate

At the time of his death (in London), Samuel Hartveld had his official residence in New York, which means that the law applicable to the movable assets (including his paintings) was that of New York. The Surrogate Court of the County of New York validated the aforementioned will of Samuel Hartveld (file number P1949-2700/A, evidence submitted by the claimants). Apart from a specific monetary legacy of 3,000 USD, the children from Samuel Hartveld's first marriage received no other portion of the estate under that will. It is therefore, in principle, ruled out that (the heirs of) [REDACTED] [REDACTED] could assert any further claim.

However, as previously mentioned, the Act of 27 April 1865 was in force in 1949, which specifically provided that heirs disadvantaged by the application of foreign law could still exercise their Belgian reserved rights over the estate's assets located in Belgium. By judgment of 16 June 1950, this rule was expressly declared applicable to the estate of Samuel Hartveld (document 29 – 19500616). Based on that judgment, notaries Geudens and Deckers prepared a draft liquidation and partition plan on 29 June 1953 (document 38 – 19530629), based on an inventory of the estate (document 31 – 19510314). Following objections by the parties, a final liquidation and partition was prepared (document 40 – 19541117).

In the liquidation, all assets and debts of both the Belgian and American holdings were listed. Among the assets (Chapter 2, Section 3) was a "*Rekening van de heer Van de Broek*" (Account of Mr. Van de Broek):

"Mr. René Van de Broek, collector of antiquities, residing in Brussels, 9 A, Boulevard de Waterloo, remains indebted in the amount of 51,353.85 [Belgian] francs, according to the following account:

He owes: 1° Purchase price of paintings mentioned above: 25,680 [francs],
2° Sale price of paintings and various objects sold by him before the judgment: 45,959.85 [francs], 3° Share of sales costs: 2,045 [francs]

Total: 73,684.85 [francs]

But he is owed: 1° His share of the sale price of various paintings of which he was co-owner: 20,450 [francs], 2° Restoration costs: 1,881 [francs]
Total: 22,331 [francs] Balance: 51,353.85 [francs]"

In the distribution, [REDACTED] received his aforementioned preferential share in full. The draft liquidation and partition stated:

"Calculation of preferential share: [REDACTED] was deprived of his inheritance share, being one quarter in full ownership; namely in the movable estate in Belgium (245,412.42 BEF) and in the estate in America

(1,805,421.92 BEF), totalling 2,050,834.34 BEF.” [...] One quarter equals 512,708.58, so after deduction of the previously paid legacy of 3,000 USD, he was still entitled to 362,108.58 BEF.

Following objections and additional evidence, [REDACTED] was ultimately allocated 597,594.85 BEF, which he received in full from the funds blocked in Belgium (document 40 – 19541117). Sonia Klein received, in addition to the rest of the blocked account, the claim against René Van de Broek. (The Commission was unable to verify whether the debt was effectively paid by Van de Broek to Sonia Klein. However, since no complaints or objections were subsequently filed, the Commission assumes that the liquidation was completed.)

Given that [REDACTED] inheritance rights have been exhausted, the Commission considers any claim from that branch of the family to be excluded.

Various artworks are mentioned in the liquidation and partition, but the painting under review by the Commission is not listed.

It is also important to note that the disputing heirs submitted numerous objections and additional evidence (see document 37 – 19520409), but no statements or objections were recorded regarding the claims and balances involving René Van de Broek.

5. Analogous Claim with Tate Gallery

The same claimants (Sonia Klein Trust and [REDACTED] and [REDACTED]) also submitted a restitution request on 10 May 2024 concerning the painting “Aeneas and his Family Fleeing Burning Troy” by Henry Gibbs (1630–1713), part of the Tate Gallery’s collection. On 28 March 2025, the UK Spoliation Advisory Panel (SAP) issued a recommendation to restitute the work (document 44 – 20250328). Given the substantial factual similarities between both cases, the Ghent Advisory Commission studied the British recommendation.

It must be noted, however, that the SAP was required to assess the matter from a different procedural standpoint. Whereas the City of Ghent requested the Commission to provide advice based on extensive historical research and without any prior position being taken, the SAP report states: “The Tate has written saying it accepts that the claimant’s evidence is ‘compelling’ [...] that it does not wish to dispute the claim.” The evidence submitted by the claimants in the British case is, as in the present matter, derived from the research conducted by Geert Sels (who is also cited in the SAP report) for his book *Kunst voor Das Reich*. Nonetheless, the SAP misinterprets the findings when it writes: “Despite a recommendation that he [Van de Broek] be brought before a Belgian court after the end

of the war, Van de Broek was never prosecuted.” This assertion does not align with the preserved prosecutorial file, which contains a preliminary investigation into possible unpatriotic conduct by Van de Broek. In that investigation, several interrogators or deputy prosecutors did raise questions regarding the veracity of certain statements made by Van de Broek, but both the military prosecutor’s office (*Krijgsauditoraat/Auditorat Militaire*) and the civil Public Prosecutor’s Office (*Openbaar Ministerie/Ministère Public*) decided to dismiss the case, which constitutes not only a “recommendation” but a formal decision not to prosecute (see letter dated 11 January 1947 from the Auditor General in Brussels to the Military Prosecutor in Antwerp, contained in the prosecutorial file, document 22 – 19480114).

From both a legal and ethical standpoint, a person must be presumed innocent until proven guilty. Moreover, on 18 October 1945, a certificate of civic loyalty was issued to René Van de Broek on behalf of the Mayor of Antwerp (prosecutorial file, no. 40, see document 22 – 19480114).

As previously mentioned, the SAP report also does not take into consideration the post-war notarial proceedings relevant to the case.

6. Reconstruction of the Facts

6.1. The Confiscation of the Hartveld Collection

The SAP rightly states that Samuel Hartveld could not, in principle, have been aware of the sale of his collection, which remained in Antwerp following his flight to New York in 1940. Moreover, postal, telegraph, and telephone communications with New York were impossible during the course of 1942. It is clear to both the SAP and the Ghent Commission that the occupying forces unlawfully confiscated the artworks present in the gallery at Otto Veniusstraat 3.

The collection was placed under *Verwaltung* (document 3 – 19420326), and *Verwalter* Heinrich Kunst prepared a description of the business on 15 July 1942, with a view to liquidation (document 4 – 19420715). Heinrich Kunst, of German origin but long resident in Antwerp and known locally for his National Socialist sympathies, was appointed as *Verwalter* by *Bestallungsurkunde* dated 26 March 1942 (see entry in the Antwerp Commercial Register, document 1 – 19281009). In his business description, he noted a positive balance of 2,952.43 BEF in a postal checking account, a bank debt of 28,637.83 BEF, and an outstanding mortgage loan of 130,546 BEF on the property at Otto Veniusstraat 3. Kunst saw no possibility of continuing the business and proposed liquidation, i.e., sale. On 28 July 1942, an inventory of the painting collection (including valuations per work) was drawn up by art expert Arthur De Heuvel, at that time still with a view to a possible public auction via auction house Campo (document 5 – 19420728). Instead of proceeding with liquidation via public auction, Kunst appears to have sold the

collection as a whole to René Van de Broek. The actual purchase agreement has not been preserved, as far as is known. The Commission found no trace of a written contract nor of any actual payment of the purchase price. (This is not uncommon, as many archives were destroyed by the German occupiers or the parties involved at the end of the Second World War.)

In the Antwerp Commercial Register (document 1 – 19281009), the Commission found the following entries:

- Registration of Samuel Hartveld on 10 October 1930 for “*schilderijen, kunstvoorwerpen, in- en uitvoer* (paintings, art objects, import and export)” at Otto Veniusstraat 3, with a marginal note stating “*werkelijke opheffing 20.4.1943* (actual termination 20.4.1943)”;
- “Declaration of change” signed by *Verwalter* Heinrich Kunst dated 5 May 1942, noting his appointment as “*kommissarisch beheerder in opdracht van den militairen bevelhebber in België en Noord-Frankrijk* (commissioner administrator on behalf of the military commander in Belgium and Northern France)”;
- On 6 October 1942, another “*opgave tot wijziging* (declaration of change)” was submitted, this time by *Verwalter* Reinhard Heits of Berchem (the *Bestallungsurkunde*, dated 21 September 1942, relieving Kunst of his duties and appointing Heits, was attached). The Commission was unable to determine the precise role played by Heits. Van de Broek, in the prosecutorial file (document 22 – 19480114), claims to have purchased the collection from Kunst.

Meanwhile, the German National Socialist *Einsatzstab Reichsleiter Rosenberg* (ERR) inspected the gallery but showed interest only in the art-historical book collection (which was subsequently confiscated, see document 6 – 19420904), not in the paintings or the art collection.

The ERR was the principal German looting organization in occupied Europe during the Second World War, responsible for confiscating archives, libraries, and artworks from opponents of National Socialism: Jews, communists, socialists, liberals, anti-German organizations, and others. The ERR handled valuable cultural assets, while the *Dienststelle Westen* (also under the supervision of Alfred Rosenberg and thus affiliated with the ERR) was responsible for clearing out the household contents (*Möbelaktion*) of deported or fleeing individuals (See Jonathan Petropoulos, *Art Politics in the Third Reich*, Chapel Hill & London, The University of North Carolina Press, 1996, pp. 126–161; Diensten van de Eerste Minister, *De bezittingen van de slachtoffers van de Jodenvervolgving in België. Spoliatie- Rechtsherstel – Bevindingen van de Studiecommissie*, Brussel, juli 2001, p. 119-146 en 236-254; Johanna Pezechkian, “La Möbelaktion en Belgique”, *Bijdragen tot de Eigentijdse Geschiedenis*, 2002, pp. 153–180).

The fact that the auction at Campo did not proceed may be due to the emergence of a prospective buyer for the entire collection (deemed by the occupiers to be less attractive or uninteresting), in the person of René Van de Broek.

6.2. The Purchase by René Van de Broek

René Van de Broek claims that *Verwalter* Kunst approached him with the question “*of ik die zaal niet wilde overnemen* (whether I wanted to take over the gallery)”. In a report by the State Security dated 10 April 1945 (document 22 – 19480114, no. 27), he asserts: “*Deze gaf mij de verzekering dat ik dit zou kunnen afkorten met maandelijksche bedragen en dat ik deze sommen zou te storten hebben op naam van Hartveld op de Westbank in de Lange Gasthuisstraat alhier. [...] De som heb ik gestort op naam van Hartveld op de Westbank en waarvan de ontvangstbewijzen in mijn bezit zijn. Na de bevrijding heb ik onmiddellijk de heer Hartveld en het Comité der Joodsche belangen hiervan ingelicht* (He assured me that I could pay in monthly installments and that I would have to deposit these sums in the name of Hartveld at the Westbank on Lange Gasthuisstraat here. [...] I deposited the amount in the name of Hartveld at the Westbank and have the receipts in my possession. After the liberation, I immediately informed Mr. Hartveld and the Committee of Jewish Interests thereof”). He further states that the amount of 200,000 BEF, in his view, “*de volle waarde weergaf van de schilderijen die er op dien oogenblik nog waren* (represented the full value of the paintings that were still present at that time)”. No trace remains today of this alleged payment — if it occurred at all — nor of any subsequent transfer of the sum to Samuel Hartveld after the war. The possibility of alternative compensation will be addressed later. First, the fairness of the price must be assessed.

6.2.1. Content and Valuation of the Purchase

Regarding what exactly was purchased by René Van de Broek, a significant correction must be made to the claim submitted by the Hartveld heirs (a misrepresentation of the facts, which was adopted by the SAP in its assessment: “that Van den Broek only paid 200,000 Belgian francs for the property and all 66 paintings, although he sold one painting from the collection to the museum of Ghent for 50,000 francs. Moreover, the building alone had been mortgaged for 800,000 francs”). The claim asserts that the purchase price of 200,000 BEF pertained to both the gallery and the painting collection. It further equates the “gallery” with the entire immovable property at Otto Veniusstraat 3, which, in addition to a gallery and auction hall (on the ground and mezzanine floors), also included three floors of apartments and an attic level. For the acquisition and construction of the property, Hartveld had taken out a loan of 800,000 BEF, which had not been fully repaid at the outbreak of the war (according to the aforementioned report by the *Verwalter*, 130,546 BEF remained outstanding). If such a valuable property had been purchased by René Van de Broek for only 200,000 BEF, this would indeed constitute a

gross imbalance in the contractual relationship. However, this does not align with the facts.

According to the records of the *hypotheekbewaarder* (mortgage registrar, see document 45 – 20250331), the property at Otto Veniusstraat 3 remained the legal property of the spouses Hartveld-██████████ throughout the war. The 200,000 BEF for “gallery and paintings” can therefore, in terms of “gallery,” be understood at most as a form of “permission to use the gallery” (possibly a rental of the sales and storage space).

The price of 200,000 BEF thus essentially pertains to the collection of 66 paintings, which, according to Van de Broek during the prosecutorial investigation, were largely of rather low artistic quality. It is, *post factum*, extremely difficult to assess with certainty the quality and value of the collection as listed in the De Heuvel inventory. Most works are described as “school of” and are therefore not attributed to a major artist, let alone signed. Most works are valued modestly, between 150 and 8,000 BEF. Only one work by Snijders (see section 6.3.1 below) is valued at 35,000 BEF, and the painting in question, “Portrait of Bishop Antoon Triest”, at 25,000 BEF (as stated, it was attributed by De Heuvel to the school of Van Dyck and would be sold in 1948 to Ghent as a Seghers for 50,000 BEF).

Gaspar de Crayer, both in the 1940s and today, is considered on the international market more of an artistic epigone or follower, whose paintings are sold for prices between 30,000 and 50,000 EUR. A highly relevant comparison is the full-length portrait by Gaspar de Crayer of Archduke and Cardinal Ferdinand of Austria, Governor of the Southern Netherlands (201.5 x 119 cm), a contemporary of Bishop Triest. This painting was auctioned at Sotheby’s New York on 22 May 2024 for an all-inclusive price of 66,000 USD (converted to 61,000 EUR), with an estimated value of 20,000 to 30,000 USD. The painting had a prestigious provenance from the collection of the Marquis de Léganès and was referenced in the literature available on the artist.

Given that the subject of the painting in question enjoys more regional than international recognition, the valuation of 25,000 BEF by Arthur De Heuvel in 1942 appears reasonable for auction purposes, especially considering that the Museum Commission (Ghent), in 1948, deemed the asking price of 60,000 BEF too high and itself estimated the work at 25,000 to 40,000 BEF (see document 23 – 19481228).

6.2.2. Payment of the Purchase Price

Whether Hartveld actually received the full purchase price remains highly doubtful, given that for businesses placed under *Verwaltung*, all incoming funds were deposited into a blocked account, mostly the German Westbank in Antwerp. No such account could be traced in the archival records.

Contrary to the SAP’s conclusion, however, the Commission finds that this does not in itself constitute definitive proof that “Hartveld received not one franc for it” (SAP, p. 4). In

order to obtain the most complete and accurate picture of the historical facts, the Commission has conducted various archival investigations to determine whether Samuel Hartveld (or his heirs) received any form of compensation — whether partial or full — for the confiscated painting collection

6.3. Compensation to Samuel Hartveld or his heirs

6.3.1. Requests with the Belgian Government

The first step was to determine whether Samuel Hartveld or his heirs received financial compensation for the confiscation of the painting collection from the competent government authorities after the war.

- As far as is known, Samuel Hartveld — who lived for approximately five years following the liberation — did not make use of the temporary post-war legislation to have certain transactions declared null and void in order to obtain restitution (such as through the *Dienst voor Economische Recuperatie* (DER; ORE: *Office de Récupération économique*; Economic Recovery Service) for restitutions, the *Ministerie van Wederopbouw* (Ministry of Reconstruction) for material war damage, the ordinary courts).
- Samuel Hartveld (and/or his legal counsel Paul Speyer) was aware of the activities of the sequestration service (Ministry of Finance) after the war. Some traces relating to Samuel Hartveld were found in this service's records, but no request for compensation concerning the painting collection was identified.
 - On 8 January 1946, the Antwerp branch of the sequestration service requested information from the *Vreemdelingendienst* (Immigration Service) regarding Samuel Hartveld's nationality (document 14 – 19460108). The service responded on 12 January that he was of Belgian nationality (document 16 – 19460112).
 - Also on 8 January, the same service informed the Brussels sequestration office of the *Brüsseler Treuhandgesellschaft* (BTG, a German company under Belgian law responsible for all wartime confiscations and sales) that Samuel Hartveld had only declared the spoliation of two vases and a piano. These items were reportedly removed from Otto Veniusstraat 3 by the *Verwalter* on 23 June 1943 (document 15 – 19460111).
 - The service inquired whether any accounts in Hartveld's name were known to the BTG. On 11 January, the BTG responded that no accounts under that name existed. On 19 April 1946, attorney Paul Speyer followed up on behalf of his client, but on 26 April the service again replied that Hartveld's name could not be found among the accounts managed by the BTG (*ibid.*).

- In the archives of the Economic Recovery Service, only an internal declaration form dated 30 August 1946 was found, which reported the spoliation of Samuel Hartveld's library (confiscated on 10 September 1942, see document 7 – 19420910) and noted that part of it had been recovered and transferred to France (document 11 – 19450830). Portions of Hartveld's art-historical library were recovered in both the French and American zones in ERR depots after the Second World War, and several books were restituted to Belgium by the authorities (Brussels, National Archives 2, I 20 DER-ORE, inv. no. 378, f. 19; Brussels, National Archives, I 695 Ministry of Public Education, Directorate of Fine Arts and Letters, Department for the Protection of Cultural Heritage, 1944–1950, inv. no. 12 [C221], f. 90; see document 19 – 1945–1947).

That Samuel Hartveld was aware of the possibility to file a declaration is evident from the fact that he did so for his confiscated library, as well as for a few personal items (a piano and two vases).

- From the Hartveld collection, only one work was registered with an identification card by the Economic Recovery Service (DER), as a result of which this single work was included on the list of artworks confiscated from the Belgian state. No declaration form is known to exist for any other painting from the Hartveld collection. (Under post-war Belgian law, it was mandatory to submit a list of looted artworks to the DER in order to obtain restitution of “luxury goods” such as artworks.)
 - The only identification card concerns a hunting scene from the workshop of Frans Snijders (document 41 – 19600212). This work was auctioned in Vienna on 29 April 2025 by Dorotheum for 44,200 EUR “pursuant to a settlement between the current owner and the heirs of Samuel Hartveld.”
 - From the archived document (document 41 – 19600212), it is not clear who initiated the creation of this identification card. In any case, it can be inferred *a contrario* that no such card was created for the other paintings.
 - In 1948, the DER published a summary *Répertoire d'œuvres d'art dont la Belgique a été spoliée durant la guerre 1939–1945*, listing a total of 301 artworks. This repertory was distributed internationally, and under number 241, the Snijders painting was listed, but without naming a dispossessed owner, and thus without mention of Hartveld.
 - Regarding cultural goods, the Economic Recovery Service submitted a list of “œuvres d'art dont la Belgique a été spoliée

durant la guerre 1939–1945 et non récupérées à ce jour” to the West German *Bundesamt für äußere Restitutionen* on 28 October 1955. This list included 1,564 works, among them the principal Jewish collections. Samuel Hartveld is mentioned only once in this list: for the Snijders hunting scene, without further information or description of spoliation. Between 1956 and 1962, the DER conducted administrative correspondence with the *Bundesamt für äußere Restitutionen*, but no artworks were restituted from West Germany. In 1960, the Snijders painting was removed from the list without explanation, presumably due to lack of evidence.

- Samuel Hartveld also did not make use of the Belgian (Material) War Damage Act of 1947 (still during his lifetime), which provided compensation to private individuals, including for lost inventories. Luxury goods (such as wine stocks or jewellery, and thus also artworks) were generally excluded from compensation. However, commercial goods and business activities were exempted from this exclusion. Hartveld’s looted collection must be considered commercial inventory, as he was registered as an antique dealer in the Commercial Register. Hartveld’s usual attorney, Paul Speyer, handled many claims under the War Damage Act, but, as far as can be determined from the preserved archives, did not do so for Samuel Hartveld.
- According to the work of the *Studiecommissie Joodse goederen* (“Study Commission on Jewish Property”), better known as the “Buysse Commissions I and II” (1997–2001) and the subsequent *Commissie voor Schadeloosstelling* (“Compensation Commission”) (2002–2007), no declaration or request for compensation was submitted by the heirs, nor to the *Cel recuperatie geroofde goederen tijdens de Tweede Wereldoorlog in België* (“Recovery Unit for Looted Property During the Second World War in Belgium”), established within the Federal Public Service for Economy.
- The Commission also made inquiries in Germany, where it was confirmed that no “BEG claim” (*Bundesgesetz zur Entschädigung für Opfer der nationalsozialistischen Verfolgung*, or Federal Compensation Act) was submitted by Samuel Hartveld, [REDACTED], or any of their children (document 46 – 20250617). This West German compensation scheme provided restitution to victims of racial persecution, including for material losses such as cultural property.

6.3.2. Possible other compensation

6.3.2.1. In General

Samuel Hartveld was unlawfully deprived of 66 paintings by the occupying forces and, as previously outlined, received no compensation from the authorities for this loss. As far as the Commission was able to ascertain, Samuel Hartveld himself did not request restitution or compensation for his painting collection. This raises the question of whether he received compensation through other means, or whether he never actually considered his collection to have been looted, and therefore eligible for compensation.

Within the ethical and legal framework, it was established that the Commission must take into account the inevitable uncertainties and gaps in provenance that are inherent to both the passage of time and the prevailing circumstances during and after the Holocaust (Principle 4 of the Washington Principles). There is no direct written evidence of any payment made by Van de Broek, nor of any transfer of a reasonable purchase price to Hartveld. In the absence of such evidence, the Commission sought serious and consistent factual presumptions.

From the thorough archival research conducted by the Commission, it has become clear that Samuel Hartveld (and/or his spouse [REDACTED]) regularly returned to Antwerp after the liberation, maintained frequent contact with René Van de Broek, and actively managed their assets — primarily through attorney Paul Speyer, who continued to represent the family's interests even after Samuel Hartveld's death.

Furthermore, several post-war elements indicate that a good relationship existed between Samuel Hartveld and René Van de Broek for approximately four years following the war, up until Hartveld's death.

6.3.2.2. The Most Likely Forged Letter of July 5, 1945

6.3.2.2.1. Context of the Letter

At first glance, the good relationship is most evident from a letter allegedly written by Samuel Hartveld to René Van de Broek on 5 July 1945 (document 10 – 19450705), which was added, at Van de Broek's own request, to the post-war investigation by the military prosecutor's office against Van de Broek on allegations of cultural collaboration. In that letter, it is claimed that the two had maintained good relations for years, that Van de Broek had made a *schijnaankoop* ("simulated purchase") of the painting collection on Hartveld's behalf, and that Van de Broek was permitted to continue renting the gallery at Otto Veniusstraat under terms to be determined by himself.

First, it is useful to outline the context of the investigation conducted by the military prosecutor. Following rumours of unpatriotic or anti-state behaviour by René Van de Broek, an inquiry was launched to determine whether he should be brought before the military tribunal and convicted of collaboration. The charges included: membership of DeVlag; undertaking study trips on behalf of Rex leader Léon Degrelle; and concealing or

retaining artworks belonging to Degrelle. Importantly, Van de Broek was not prosecuted for any actions related to Hartveld's painting collection or the looting of former Jewish property. It was Van de Broek himself who, in his defence, sought to demonstrate his patriotic loyalty by asserting that, had he adhered to National Socialist ideology and thus been antisemitic, he would never have invested in saving the property of a Jewish owner: "*dan had ik niet zooveel financiën opgeofferd om de goederen van een gevluchten Israeliet te redden* (then I would not have sacrificed so much money to save the goods of a fleeing Israelite)" (document 22 – 19480114, letter from René Van de Broek to military prosecutor Kryn dated 30 October 1946).

Ultimately, René Van de Broek was not summoned before the military tribunal (or the ordinary criminal court) for any of the alleged offenses, let alone convicted. Nevertheless, the prosecutorial file contains several suspicious elements that continue to cast doubt on Van de Broek's allegiance, whether to Germany or Belgium:

- That he was a member of DeVlag is suggested by a signed entry of his name on a membership list, but he also presented evidence that he had only ever ordered one publication from DeVlag and subsequently requested that no further propaganda be sent (see document 22 – 19480114, nos. 56–57). A "*grondige huiszoeking die echter niets opleverd* [sic] (thorough house search, which yielded no results)" was conducted at that time (report dated 16 February 1946, *ibid.*, no. 57). The single publication in question was reportedly the art book *Stein und Herz*, which Van de Broek stated in a report dated 29 October 1946 had been "*op abonnement uitgegeven* (issued by subscription)" (*ibid.*, no. 86). On the other hand, a report from the Central Documentation Service of the Office of the Auditor General dated 3 January 1946 stated that René Van de Broek, residing at Blindenstraat 10, appeared on the subscription list for *Volksche Aanval*, a publication of the anti-Jewish organization Volksverwering (*ibid.*, no. 67). However, Blindenstraat 10 was also the address of his father, Alfons Van de Broek, who was listed among the collaborators due to his membership in Rex and DeVlag (*ibid.*, nos. 78–79).

The *Duitsch-Vlaamsche Arbeidsgemeenschap* (DeVlag) was founded before the Second World War with the aim of promoting cultural ties between Flanders and Germany. During the war years, it became increasingly radical and National Socialist, in contrast to other Flemish collaboration movements such as the VNV (see Frank Seberechts, "*Duitsch-Vlaamsche Arbeidsgemeenschap*", in: *Nieuwe Encyclopedie van de Vlaamse Beweging*, Lannoo, 1998, pp. 994–997; Etienne Verhoeyen, *België bezet. 1940–1944. Een synthese*, Ghent, BRTN publication, 1993, pp. 218–233).

René Van de Broek does not appear as a contributor in the monthly journal of DeVlag (*Deutsch-Flämische Arbeitsgemeinschaft*) for the period 1942–1944, had no editorial involvement or article contributions, and was not listed among the advertisers (six to eight pages per issue, where he could have promoted his restoration activities or painting sales).

- That he requested permission from the occupying forces to travel to France and the Netherlands is not disputed by Van de Broek. The first document in the prosecutorial investigation file is an application for a “*geleibrief* (safe-conduct pass)” dated 3 January 1944 (for various trips to Paris and other French locations between 9 January and 9 April 1944, *ibid.*, no. 1). On the application for the travel pass to France, Louis Collard, “*chef-adjoint du Département Politique* (Deputy Head of the Political Department),” explicitly stated that René Van de Broek “*nous est particulièrement bien connu et offre toutes les garanties au point de vue National-Socialiste* (is particularly well known to us and offers all guarantees from a National Socialist perspective),” and that he had received a study assignment from Degrelle. The form gives the impression that Van de Broek signed this statement. However, the actual application was handwritten by Van de Broek; the “*advies* (endorsement)” was typed and thus added, possibly before Van de Broek signed, but possibly afterward. This latter scenario is what Van de Broek himself claimed in a report dated 29 October 1946: “*Ik houd staande dat ik de drie aanvragen om gelijbrieven in blanco heb geteekend. De recommendatie waarvan u mij lezing geeft is er nadien opgeschreven geweest* (I maintain that I signed the three applications for safe-conducts in blank. The recommendation you read to me was added afterward)” (*ibid.*, no. 86). The endorsement in question — except for the substitution of “Holland” with “France” — is a *verbatim* copy of a recommendation dated 11 November 1943 (*ibid.*, no. 2) concerning a trip to the Netherlands from 15 November 1943 to 15 February 1944. The application in question (*ibid.*, no. 3) was again handwritten and signed on 3 November 1943. This time, the typed addition regarding the purpose of the trip reads: “*Se rendre en Hollande pour voyage d’étude.*” The advisory note concerning Van de Broek’s political convictions, dated 11 November, therefore postdates the application of 3 November, and there is no evidence that Van de Broek ever signed a document describing his National Socialist stance. (The advisory note by Louis Collard for the trip to France, using identical wording, is undated, *ibid.*, no. 43.) The prosecutorial file also contains an application for a safe-conduct pass for France, dated 19 October 1943, which was entirely handwritten by Van de Broek. Under the motivation section, it states: “*Chargé par le Chef de Rex, Léon Degrelle, de rechercher des documents nécessaires à ses études historiques*” (*ibid.*, no. 44). An endorsement by the occupying authorities stating that René Van de Broek “is particularly well known to us and offers all guarantees from a National Socialist

perspective,” and that he had received a study assignment from Degrelle, does not negate the fact that, as an art dealer, he had every financial interest in undertaking such trips. Van de Broek appears here as an opportunist, but not as an overt collaborator and/or antisemite. Selling artworks to the Rex leader does not constitute collaboration. It must be reiterated that René Van de Broek was never brought before a court, let alone convicted. Until proven otherwise, every person must be presumed innocent.

- That he held property belonging to Rex leader Léon Degrelle is not denied by Van de Broek, but he contextualizes this possession as part of a transaction involving manuscripts to be paid for with artworks (see, among others, his letter dated 16 September 1944, *ibid.*, no. 8). He cooperated during the house search, identified Degrelle’s belongings, which were then seized and thus became subject to a prohibition on alienation. The storage area was sealed. After a bombing (reported by Van de Broek’s mother in a police report dated 17 December 1944, *ibid.*, nos. 23–25), the premises were unsealed and resealed, and the seized items were found to be untouched (report dated 16 January 1945, *ibid.*, no. 22). While the initial house search resulted in the seizure of many artworks, subsequent statements by the actual owner revealed that these artworks did not belong to Degrelle but to Count le Grelle, who had entrusted Van de Broek with the task of safekeeping and restoring them (statement by Count le Grelle dated 10 April 1945, *ibid.*, no. 28). Artworks that did belong to Degrelle were seized (and transferred to the sequestration services in 1949 due to Degrelle’s ownership): two female portraits (seized on 10 April 1945 by order dated 13 March 1945 from the military prosecutor, see inventory, *ibid.*, no. 21), two globes, and a ship model — the latter located at Otto Veniusstraat 3 (*ibid.*, nos. 26–28; report by State Security dated 10 April 1945, forwarded to the military prosecutor).
- The prosecutorial investigation also contains statements from Jeanne Roelants (concierge at Otto Veniusstraat 3) and Charles Van de Putte, who was appointed by Van de Broek in 1942 as artistic and commercial director. Both testified that they were unaware of any National Socialist sympathies on Van de Broek’s part.

Roelants stated: “*Tijdens de bezetting werd het huis inbeslaggenomen door de Duitschers en onder Verwaltung gesteld. De zaal met de schilderijen erin werd gekocht door den heer Vandenbroek en door hem verder uitgebaat. Over de politieke gezindheid van Vandenbroek weet ik niets. Ik weet niet dat hij in betrekking stond met Léon Degrelle* (During the occupation, the house was seized by the Germans and placed under *Verwaltung*. The gallery with the paintings was purchased by Mr. Vandenbroek and continued to be operated by him. I know nothing about

Mr. Vandenbroek's political views. I do not know that he had any connection with Léon Degrelle)" (report dated 10 April 1945, *ibid.*, no. 27).

Van de Putte stated: "*Au titre de Directeur artistique et commercial de Mr. R. Van de Broek, je me crois autorisé à vous affirmer, de la manière la plus formelle, que rien ne peut être reproché à ce dernier, non seulement en ce qui concerne l'affaire L.DEGRELLE [...] mais encore et surtout en ce qui concerne son affiliation à tout groupement ennemi - ou favorable à l'ennemi - pendant l'occupation. Patriote éprouvé, je n'eus jamais admis de travailler avec lui si je n'avais en tous mes apaisements à ce sujet et j'ai vécu dans son intimité depuis 1942 pour que je ne puisse engager ma parole quand [sic] à l'attitude exempte de tout reproche de Mr. Van de Broek et à l'assurance qu'il n'a jamais fait partie d'aucun groupement, Rexiste, V.N.V. ou autre* (As Artistic and Commercial Director of Mr. R. Van de Broek, I believe I am authorized to confirm, in the strongest terms, that nothing can be reproached to him, not only with regard to the matter of L. DEGRELLE [...] but also and especially with regard to any affiliation with enemy groups — or groups sympathetic to the enemy — during the occupation. As a proven patriot, I would never have agreed to work with him had I not been fully reassured on this matter, and I have lived in close association with him since 1942, such that I can vouch for Mr. Van de Broek's irreproachable conduct and confirm that he was never a member of any group, Rexist, V.N.V., or otherwise)" (*ibid.*, no. 19). Van de Putte was also interviewed by a State Security commissioner in Brussels on 1 August 1945, at Waterloosteenweg 9, where Van de Broek operated his Brussels gallery. Van de Putte stated that he had been employed by Van de Broek since December 1942, first at Otto Veniusstraat 3 in Antwerp and from late February 1944 in Brussels. He reported seeing Léon Degrelle twice in Antwerp but never having entered into any contractual relationship with him (*ibid.*, no. 32).

- While these may be considered "partisan" witnesses, attention must also be drawn to the statement of Virginia Paula Engelbosch, herself a member of the resistance, who had nothing negative to report about Van de Broek in the context of the military prosecutor's investigation (*ibid.*, no. 80: interrogation of Virginia Paula Engelbosch dated 8 October 1946). She also submitted a supplementary letter to confirm her exculpatory statements (document no. 53bis): "*Deze persoon behoort reeds van in het jaar 1938 tot mijne kennissen en ik sta er borg voor dat zijn gedrag tijdens den oorlog steeds zeer vaderlandschlievend was* (This person has been known to me since 1938, and I vouch for the fact that his conduct during the war was always highly patriotic)." In her letter, she illustrates this by recounting that during a visit to Paris in 1944, Van de Broek discovered that a liaison for the

Belgian resistance in Paris was in fact a double agent reporting to the Germans. Van de Broek informed the Belgian resistance of this.

In summary, while there are some indications of close ties with the occupying forces, there is no conclusive evidence of collaboration or antisemitism. Ultimately, René Van de Broek was not prosecuted for any of the alleged offenses. Even today, he must therefore still be considered innocent of any form of collaboration.

6.3.2.2.2. Has the Letter been Forged?

In his book *Kunst voor Das Reich*, investigative journalist Geert Sels elaborates on the relationship between Hartveld and Van de Broek and, based on several indications, questions whether the letter in question might simply be a forgery. For this reason, he commissioned a handwriting expert to examine the letter and the signature beneath it. The conclusion reached was that the letter is indeed most likely to be forged.

Because the Commission was granted only limited access to this handwriting report under strict conditions, and because it had discovered additional correspondence that was more closely aligned in date with the disputed letter, it decided to appoint two independent handwriting experts — both listed on the national register of forensic experts — to assess whether the letter was forged. Both experts concluded that the letter is highly likely to be a forgery (documents 49 – 20250831 and 50 – 20250916).

The Commission therefore considers that the letter dated 5 July 1945 cannot be used as a factual presumption. At most, the factual elements mentioned in the letter — where they are also asserted elsewhere in the prosecutorial investigation — may be verified for their substantive accuracy.

6.3.2.3. On the relationship between Hartveld and Van de Broek

It is highly unusual for the acquirer of looted property (Van de Broek) to maintain a good relationship with the dispossessed party (Hartveld). *A fortiori*, asserting that the transaction was a “simulated purchase” and that the acquirer himself was permitted to determine the terms of continued rental is, at first glance, incomprehensible. It would therefore be of particular interest to have access to the accounting records of the gallery, and/or of Hartveld, for the period in question.

6.3.2.3.1. Lack of Proof in the Accounts

The Commission sought possible accounting records through various channels.

- For the family of René Van de Broek, no such records were found by the Commission. The prosecutorial investigation does indicate that accounting documents were seized for a period (inventory of seized items filed on 2 August

1945, document 22 – 19480114, no. 31), but ultimately returned without further action (report of return dated 1 October 1945, *ibid.*, no. 33: “*Ik krijg kennis dat de boekhouding, aangeslagen door de Veiligheid van de Staat niet dient weerhouden te worden ten dienste van het onderzoek, daar er geene bezwarende feiten in voorkomen omtrent eenig misdrijf tegen de veiligheid van den Staat* (I am informed that the accounting records seized by the State Security do not need to be retained for the purposes of the investigation, as they contain no incriminating evidence regarding any offense against the security of the State)”). Whether any accounting records from that period have been preserved to this day could not be determined by the Commission.

- Regarding the heirs of Hartveld, the Commission submitted a request to their legal counsel concerning the existence of preserved accounting records, but this inquiry remained unanswered.

6.3.2.3.2. The Existence of a Rental Agreement

The Commission’s investigation revealed that the Hartveld family not only retained ownership of the property at Otto Veniusstraat 3, but also continued to visit the premises regularly, even while René Van de Broek continued to operate his business in the gallery for up to four years after the liberation of Antwerp. Based on these findings, it can be concluded that there must have been some form of arrangement between Samuel Hartveld and René Van de Broek. Whether such arrangements were documented in writing remains unknown; they may just as well have been verbal agreements. The existence of post-war arrangements regarding the use of the gallery does not, however, constitute evidence of any agreement concerning compensation for the paintings looted during the war. However, what is at least certain, is that René Van de Broek entered into a rental agreement concerning the gallery at Otto Veniusstraat on 6 July 1945. This is explicitly stated in the judgment of 16 June 1950 concerning the estate (document 29 – 19500616).

6.3.2.3.3. Hartveld’s Financial Interests are being safeguarded during the War

During the war, at a time when international banking transactions were impossible and Samuel Hartveld and [REDACTED] were residing in the United States, their loan — of which approximately 130,000 BEF remained outstanding (as evidenced by the previously cited statement of the *Verwalter*) — was repaid. The *Algemene Spaar- en Lijfrentekas* (“General Savings and Annuity Fund”, a bank) issued a release of the mortgage registration on 18 June 1943 (document 8 – 19430618), which indicates that the outstanding debt had been settled.

Repayments of a mortgage loan primarily benefit the owner of the mortgaged property. The release therefore demonstrates that someone, during the war, was acting in Antwerp on behalf of Hartveld's interests and ensured that his real estate was not lost.

6.3.2.3.4. Cooperation between Hartveld and Van de Broek before and after the War

During the Commission's investigation, several elements emerged that shed light on the "cooperation," or at least "understanding," between Hartveld and Van de Broek. The most decisive, serious, and consistent factual indications are addressed under section 7.1. The archival research revealed the following facts:

- Although Van de Broek explicitly stated about Hartveld, "*wij deden tezamen vele zaken. Hij was een goed vriend van mij* (we did many business dealings together. He was a good friend of mine)" (State Security report dated 10 April 1945, document 22 – 19480114, no. 27), there is no evidence that Samuel Hartveld and René Van de Broek cooperated prior to the war, even though it is plausible that they knew each other. Since 1930, Samuel Hartveld operated one of the few and most renowned galleries in Antwerp at Otto Veniusstraat, while René Van de Broek, having followed training at Sint-Lucas (academy of art), worked as a painting restorer with a studio on Montebellostraat and residence on Blindenstraat, both addresses located near Otto Veniusstraat. Whereas Van de Broek was still young (born in Antwerp on 13 May 1909), he cannot be considered a complete newcomer to the art world. His father Alphonse ran a stained-glass business in Brussels dating back to the nineteenth century ("*depuis 1882*"), and his brother Joris also pursued artistic training and worked as a glazier. René Van de Broek was registered in the Antwerp Commercial Register on 23 December 1940, with Blindenstraat 10 as his address, and with the actual commencement of activities (certified by the local police commissioner) dated June 1938, for "trade in paintings and antiques and restoration of paintings" (document 2 – 19401223).

A modification to the Commercial Register dated 13 January 1941 added that, since September 1938, there was also a workshop on Montebellostraat in Antwerp. A further modification dated 11 May 1942 removed this second location due to "*opgehouden te bestaan sedert 1 oktober 1941 wegens einde huurceel* (ceased operations as of 1 October 1941 due to termination of lease)" (*ibid.*). On 4 May 1944, Van de Broek signed a declaration of modification to the Commercial Register regarding the opening of a branch at Otto Veniusstraat 3, effective 1 January 1943. On 5 January 1950, he signed another modification declaring the "*sluiting vanaf 1-8-49 van het bijhuis 'Galerij Otto Venius* (closure as of 1 August 1949 of the branch 'Galerij Otto Venius')."

- In the prosecutorial investigation, Van de Broek claimed to have discussed the purchase of the business with [REDACTED], Hartveld's son: "*Indien zyn zoon, [REDACTED] Advokaat te Brussel, gefusilleerd tydens de bezetting, nog moest leven zou hy komen getuigen dat ik verschillende malen hem voorstelde al de kunstwerken en bijzonder de eenig en ryke bibliotheek te redden. Hy wachtte te lang en er werd een Verwalter benoemd, toen kon ik alleen nog door aankoop de kunstwerken redden* (Had his son, [REDACTED], lawyer in Brussels, executed during the occupation, still been alive, he would testify that I repeatedly proposed to him to save all the artworks and especially the unique and rich library. He waited too long and a *Verwalter* was appointed; at that point, I could only save the artworks through purchase)" (document 22 – 19480114, letter from Van de Broek to military prosecutor Kryn dated 30 October 1946). (In fact, [REDACTED] resided and worked professionally in Brussels. He was affiliated with the ULB (*Université Libre de Bruxelles*) academic community. As a member of the resistance, he may have avoided the family address in Antwerp for safety reasons; moreover, transportation was limited and curfews were in effect.)
- On 10 February 1945, Van de Broek made a similar statement to American authorities investigating Hartveld Galleries, asserting that he had purchased the inventory in Antwerp to avoid liquidation of the gallery. He explicitly stated that he "plans to settle fairly with Hartveld" (Washington DC, NARA, Record Group 239, Records of the American Commission for the Protection and Salvage of Artistic and Historic Monuments in War Areas, Geographical Card Files on Possible Art Looting Subjects, NAID:66853435, #55–56, undated card referencing a statement of 10 February 1945).
- During the war, Van de Broek continued operating the Otto Venius gallery. He organized auctions and bought and sold artworks at Otto Veniusstraat. Whether he paid Hartveld for the works originally belonging to him (possibly only upon resale) is not proven; *a fortiori*, there is no evidence of payment of the full "purchase price" of 200,000 BEF for the entire collection.
- From the previously discussed liquidation and partition of Samuel Hartveld's estate, it appears that Hartveld and Van de Broek continued to collaborate without disagreement until 1949: Hartveld's paintings were "*in consignatie* (on consignment)" with Van de Broek, and the two men jointly owned certain artworks. The liquidation mentions "recent" sales for which settlement was still pending. There is reason to believe that this also applies to the disputed painting sold shortly before, in 1948. (Samuel Hartveld and [REDACTED] had returned to Antwerp as early as July 1945.)

- Furthermore, there is no certainty that Van de Broek actually paid the 200,000 BEF purchase price to the *Verwalter* or to Hartveld. In the prosecutorial investigation, Van de Broek claimed to have deposited the amount into an account in Hartveld's name at the Westbank, but no trace of such a transaction exists post-war. When Hartveld inquired with the sequestration services, he was informed that no accounts existed in his name (document 18 – 19460426). This inquiry may be interpreted as a request regarding the blocked funds of 200,000 BEF. Following the negative response from the sequestration services, Hartveld took no further action, which may be understood as acquiescence.
- In March 1944, Van de Broek himself took out a mortgage loan (document 9 – 19440321). However, the Commission was unable to determine the purpose for which the funds were intended

That René Van de Broek continued to use the gallery at Otto Veniusstraat for approximately four years after the liberation, and during the lifetime of Samuel Hartveld, based on a lease agreement and in regular cooperation with Hartveld, is evidenced not only by the liquidation-partition of the estate, but also by the following factual elements:

- In the telephone directories for the years 1947–1950 (document 21 – 1947–1950), “Galerie Otto Venius” is listed under “*tableaux, antiquités*” with telephone number 310 10, located at Otto Veniusstraat 3. The same number and address are also listed under the name of René Van de Broek (with the note “*Restauration tableaux*” alongside his other address, Blindenstraat 10, for which telephone number 231 78 applies).
- Correspondence from the military prosecutor's office addressed to René Van de Broek is sent to Otto Veniusstraat 3 (see document 22 – 19480114, records from the Office of the Auditor General dated 28 and 30 January 1946 and 4 February 1946, which state that Van de Broek resides at Otto Veniusstraat. Antwerp police reports from December 1945 and 14 January 1946 more accurately note that he resides on Blindenstraat but operates his business at Otto Veniusstraat).
- After the liberation, both Samuel Hartveld and his wife regularly returned to Antwerp, where Hartveld either managed his affairs personally or delegated them:
 - o [REDACTED] stated that she returned to the United Kingdom in May 1945 to accompany her husband in acquiring new cultural goods and to Belgium “in order to settle matters she had left there” (Washington DC, NARA, Record Group 239, Records of the American Commission for the Protection and Salvage of Artistic and Historic Monuments in War Areas, Subject Files, NAID: 66891058, #249).

- On 6 July 1945, the lease agreement between Hartveld and Van de Broek, previously referenced (document 29 – 19500616), was signed.
- On 17 August 1945, Hartveld signed a power of attorney before a notary in Antwerp (see document 17 – 19460410: in April 1946, attorney Paul Speyer acted on behalf of Hartveld “*ingevolge volmacht verleden voor notaris René Cavenaile te Antwerpen op zeventien oogst negentien honderd vijf en veertig* (by virtue of a power of attorney executed before notary René Cavenaile in Antwerp on the seventeenth of August nineteen hundred and forty-five)”).
- On 16 October 1945, a payment order was served in the name of Hartveld and his wife to contracting parties due to outstanding payments (document 12 – 19451016).
- In a notarial deed dated 10 April 1946, Samuel Hartveld is described as “*wonende te Antwerpen, Otto Veniusstraat 3, thans verblijvende te New York, 21 East 57 Street* (residing in Antwerp, Otto Veniusstraat 3, currently residing in New York, 21 East 57 Street)” (document 17 – 19460410).
- On 12 July 1947, Samuel Hartveld was in Antwerp, where he visited, among others, his friend, curator [REDACTED]. [REDACTED] subsequently wrote a letter to Hartveld, addressed to “*Otto Venius House, Otto Veniusstraat, alhier* (Otto Venius House, Otto Venius Street, here [Antwerp])” (document 20 – 19470712).
- Between 1945 and 1947, Hartveld used both his New York gallery address and the Otto Venius House Antwerp address in his letterhead (document 13 – 1945–1950).
- Correspondence between Hartveld and The Frick Collection in New York indicates that Hartveld was often away from New York for extended periods, such as between 11 December 1947 and February 1948, and again in May 1948 (document 13 – 1945–1950).
- When the city administration sent a letter of thanks in May 1949 for a donation made by Samuel Hartveld, it was addressed to *Otto Veniusstraat 3* (document 26 – 19490901). The engraving was already in the possession of the city and had thus been delivered by or on behalf of Samuel Hartveld.

Between the liberation and the sale of the painting “Portrait of Bishop Antoon Triest”, both René Van de Broek and Samuel Hartveld used Otto Veniusstraat 3 as their correspondence address. The gallery and trade name continued to be used by Van de Broek without any objection from Hartveld. It was from Antwerp (and not, for example, from Van de Broek’s Brussels branch) that the disputed painting was transported to Ghent.

6.3.2.3.5. Van de Broek as a ‘Safekeeper’ During the War

Because Van de Broek managed the gallery and collection following his “acquisition” from the *Verwalter*, the property at Otto Veniusstraat did not remain unattended during the war. As previously noted, the painting collection itself was not removed, and the furniture (from the ground floor and the private quarters of the Hartveld and [REDACTED] families) was also spared — except for the library collection reported to the Economic Recovery Service (DER), a piano, and two vases.

In May 1940, the spouses Hartveld-[REDACTED] left all their belongings behind in their Antwerp apartment located above the gallery at Otto Veniusstraat 3. While their son [REDACTED] may have initially, at the outbreak of the war, kept watch, the apartment was left unattended following his arrest. The prosecutorial investigation confirms that a concierge was present, but the residence remained vacant and belonged to Jewish occupants. It is possible that Van de Broek’s takeover indeed played a role in preventing the personal belongings of the Hartveld family from being targeted by the *Möbelaktion* — the systematic clearing of household contents — or by German military requisitions. The Commission reviewed archival records to determine whether the Hartveld-[REDACTED] property had been subject to the German *Möbelaktion*. While this was the case for other houses on Otto Veniusstraat, it was not for number 3. One of the apartments at number 3 was also occupied by [REDACTED] and her husband, diamond merchant [REDACTED]. Both fled to Latin America, but according to the consulted archives, they did not file any claims for the spoliation of diamonds or other material possessions. As far as the Commission could determine, there was no occupation by German soldiers, German civilian personnel, or collaborating organizations at Otto Veniusstraat 3 during the occupation.

6.3.2.3.6. Items From the De Heuvel Valuation List Still Present in the Estate

There are indications that the Hartveld collection — of which a portion was certainly sold through Van de Broek during and after the war — partially returned to Hartveld’s possession. In the Hartveld estate of 1949, inventoried by Brussels expert Jean-Pierre Van Goidsenhoven in 1950 and auctioned in 1951, at least seven works were identified whose descriptions show notable similarities with the De Heuvel valuation list (1942). The valuation of the paintings present in Belgium, for the estate inventory in the context of the liquidation-partition (see section 4.1. Family History and Succession), was conducted by Van Goidsenhoven. These paintings were found to be “on consignment” with René Van de Broek in Brussels.

Expert Van Goidsenhoven confirmed that on 6 December 1950, he was shown 55 paintings (nos. 1–51 & 58–61), along with several objects and pieces of furniture, at Van de Broek’s Brussels gallery. According to Van de Broek’s statement, three of the viewed paintings (nos. 9, 15, 33) had already been sold at the end of June 1949 at prices agreed

upon with Samuel Hartveld. For one of these three sold works (no. 33), Van de Broek was involved in legal proceedings with the buyer due to insolvency.

In statements recorded on 13 June 1951, Van de Broek reported that all consigned paintings had since been entrusted to Mr. A. Demul, director of the Brussels auction house *Palais des Beaux-Arts*. The auction house of the *Palais des Beaux-Arts* did indeed publicly sell paintings from the Hartveld collection on 21 May 1951 (document 32 – 19510521).

Cross-referencing the chaotic 1942 De Heuvel inventory, the 1950 Van Goidsenhoven inventory, and the 1951 Brussels auction reveals probable connections for at least seven paintings:

- 1942: 191) After Titian, *The Adulterous Woman*, 3,500 BEF
1950: 14) *Christ and the Adulterous Woman*, Flemish School, 17th century, unsigned, 3,000 BEF
1951: 162) Flemish School, early 17th century, *The Adulterous Woman*
- 1942: 222) Italian School, 18th century, *Ruins*, 2,500 BEF
1950: 50) *Landscape of ruins. Stormy sky*, attributed to Paul Brill, Antwerp, Flemish School, 18th century, 8,000 BEF
1951: 65) Brill, Paul (school of), Flemish School, 17th century, *Landscape with figures*
- 1942: 663) Dutch School, Storck, *Seaport*, 2,000 BEF
1950: 24) *View of a port*, attributed to Isaac Ouater, Dutch School, 18th century, 2,500 BEF
1951: 125) Schoevaerts, Mathias, Flemish School, late 17th century, *River landscape with castle*
- 1942: 479) *Nymphs and Satyrs*, 200 BEF
1950: 4) *Satyr contemplating a sleeping nymph*, by Karel De Moor, Dutch School, 18th century, 5,000 BEF
1951: 74) De Moor, Karel, Dutch School, 1656–1738, *Nymph and Satyr*
- 1942: 656) Italian School, 17th century, *Palace with figure*, 300 BEF
1950: 29) *Interior of a Palace* by Pieter Neeffs, Antwerp, Flemish School, 17th century, monogrammed, 4,000 BEF
1951: 112) Neeffs, Pieter, Flemish School, 1578–1656, *Interior of a palace*
- 1942: 359) Bourguignon, *Battle*, 4,500 BEF
1950: 30) *Cavalry combat*, by Bartholomeus Breenberg, Dutch School, 17th century, 4,000 BEF

1951: 64) Bredael, Jan-Frans, Flemish School, 1689–1750, *Cavalry combat*
(Note: Breenberg is not a battle painter, nor is Bredael...)

- 1942: 438) After Titian, *Venus of Florence* (old copy), 3,500 BEF
1950: 36) *Florentina*, Antwerp School, unsigned, 3,750 BEF

This creates a picture in which at least part of Samuel Hartveld's painting collection — looted by the *Verwalter* and subsequently “managed” by René Van de Broek during and after the war — was still under Van de Broek's custody in 1949, but was regarded as the property of Samuel Hartveld, not of René Van de Broek.

6.3.2.3.7. Additional Findings

Apart from the attitude toward René Van de Broek as an individual, there are also indications that Samuel Hartveld harboured no resentment or sense of grievance toward Belgium or Antwerp, and that he continued to manage at least part of his assets there, together with his spouse. As previously noted, no claims were submitted to the Belgian authorities.

- For instance, a few months before his death, he donated an engraving to the Print Cabinet of Antwerp (document 26 – 19490901). Hartveld's donation was announced in local newspaper *Het Nieuws van den Dag* on 4 September 1949 (document 27 – 19490904).
- That summer, works from Hartveld's collection were also included in the exhibition at the Royal Museum of Fine Arts Antwerp (*KMSKA*) commemorating 350 years of Van Dyck (document 25 – 19490703).
- His obituary and a note of thanks for condolences from the widow and three children appeared in the newspaper *Le Soir* on 9 and 16 September 1949, respectively (document 28 – 19490909).

Based on all of the above, the Commission concludes that Samuel Hartveld remained actively engaged in public and commercial life in Belgium and maintained positive relations with René Van de Broek. Therefore, when the disputed painting left Otto Veniusstraat in 1948, was exhibited in Ghent for several months, and subsequently sold to the city, it would be highly surprising if Samuel Hartveld had not been aware of this.

7. Just and Fair Solution: Recommendation

7.1. Serious and Consistent Factual Presumptions

Counsel for the original claimants asserts that the only just and equitable solution is restitution of the painting. In support of this, he refers to the circumstances under which Samuel Hartveld was forced to flee the country abruptly, leaving behind all his paintings, which were subsequently confiscated by the occupying forces, for which he never received compensation from the authorities. It is further noted that a valuable book collection was also taken and never returned or compensated, and — most significantly — that Samuel Hartveld and [REDACTED] lost their only son due to an unlawful execution by the occupiers.

However tragic these facts may be, the Commission is of the opinion that, in the present claim concerning the city of Ghent as the current holder of a single painting, the city cannot be held liable for compensation relating to other damages and suffering not connected to the painting.

The question remains whether, in light of all the foregoing, restitution is the appropriate and equitable solution. Yes, Samuel Hartveld was the owner of the disputed painting prior to the war. Yes, ownership of the painting was *de jure* taken from him when the German occupiers appointed a *Verwalter* over the entire Hartveld collection. However, based on various elements uncovered through archival research, the Commission concludes that it has been proven that Samuel Hartveld was compensated for his loss after the Second World War.

The Commission unanimously reaches this conclusion based on the following serious and consistent factual indications:

- The painting collection, and specifically the “Portrait of Bishop Antoon Triest”, did not leave Antwerp during the war as a result of the appointment of the *Verwalter*. While there was *de jure* spoliation, there was no *de facto* removal of the artwork. The property at Otto Veniusstraat 3 was also not subject to clearance under the *Möbelaktion* or to military occupation.
- René Van de Broek continued operating the gallery and auction house under the trade name Otto Venius House. According to his own statement (not corroborated by other documents or factual indications), he did so at the request of Samuel Hartveld. There are elements suggesting that Hartveld and Van de Broek knew each other prior to the war, but not sufficient to conclude that they had made prior arrangements. What is proven, however, is that after the liberation, both art dealers continued to collaborate in full agreement — so much so that the Hartveld estate includes settlements for the sale of paintings belonging to Samuel Hartveld

that were on consignment with Van de Broek, as well as for artworks held in joint ownership.

- There are thus indications that a financial arrangement was made, or at least agreements were reached, between Samuel Hartveld and René Van de Broek. One explicitly proven agreement concerns the continued lease of Otto Veniusstraat 3 by Van de Broek after the liberation and until 1 August 1949 (according to the Commercial Register).
- The liquidation and partition of the estate also includes financial arrangements for several specifically named paintings sold by Van de Broek in 1949, the year of Hartveld's death. "Portrait of Bishop Antoon Triest" was sold in 1948, but likely under similar arrangements between Hartveld and Van de Broek.
- The painting "Portrait of Bishop Antoon Triest" was exhibited in, and sold to, the city of Ghent during Samuel Hartveld's lifetime, at a time when he and his spouse were regularly present in Antwerp. The painting was transported to Ghent from Antwerp. While this may not constitute tacit approval of the sale, it is likely that Hartveld was aware of it.
- Samuel Hartveld did not file a claim for the spoliation of his painting collection, neither with the Economic Recovery Service nor with other institutions such as the Ministry of Reconstruction or the West German government. He did file claims for certain household items (a piano and vases) and for his library. A pension application was also submitted and granted in 1954 for his son [REDACTED], in recognition of his status as a political prisoner. These various applications demonstrate that Samuel Hartveld — and especially his counsel Paul Speyer, who specialized in such matters — was well aware of the avenues available for seeking compensation, but chose not to pursue them for his paintings.
- That painting collection, or at least part of it (as evidenced in the estate liquidation), was monetized after the war in collaboration with Van de Broek. This leads to the factual presumption that Samuel Hartveld considered himself sufficiently compensated in this manner.
- Furthermore, the heirs Sonia Klein, [REDACTED] did not raise any objections or lodge complaints regarding the liquidation and distribution of the estate, which was finalized five years after Samuel Hartveld's death. The counsel for [REDACTED], who initially made a temporary reservation during the inventory process, did not pursue any objections. This indicates that, in the eyes of the first-generation heirs, all matters were properly settled.

7.2. Conclusion

The Commission therefore concludes with the following recommendation to the City of Ghent:

The request submitted by the heirs of Samuel Hartveld — namely the Sonia Klein Trust and the individual successors [REDACTED] — for restitution of the painting “Portrait of Bishop Antoon Triest” cannot be granted. The City of Ghent may be considered the rightful owner of the artwork.

Although the painting, originally owned by Samuel Hartveld, was placed under *Verwaltung* during the Second World War and may therefore be classified as looted cultural property, various serious and consistent factual presumptions support the conclusion that the original owner (and his direct heirs) were already compensated for the spoliation in the years following the war. Accordingly, there is no basis in 2025 to award restitution or financial compensation to the heirs.

The fact that financial compensation was previously provided does not negate that Samuel Hartveld, as an art dealer, was the victim of a clear act of spoliation. Therefore, the Commission recommends that a form of moral reparation be implemented, specifically by explicitly acknowledging the unacceptable act of spoliation in the provenance history, on the occasion of exhibiting “Portrait of Bishop Antoon Triest”, or in its publication.

Ghent, September 26, 2025

Michel Ceuterick

Jacques Lust

Georges Martyn

Exhibits in Chronological Order

1. 19281009 Registration of Samuel Hartveld in the Antwerp Commercial Register dated 9 October 1928, with subsequent amendments. Beveren, State Archives, Commercial Court of Antwerp, Commercial Register (R538), inventory nos. 151, 723, and 749.
2. 19401223 Registration of René Van de Broek in the Antwerp Commercial Register dated 23 December 1940, with subsequent amendments. Beveren, State Archives, Commercial Court of Antwerp, Commercial Register (R538), inventory nos. 566, 611, 723, 834, and 1348.
3. 19420326 Appointment of *Verwalter* Heinrich Kunst, recorded in Exhibit 1 – 19281009.
4. 19420715 Description of Samuel Hartveld's art business by *Verwalter* Heinrich Kunst. Pierrefite-sur-Seine, *Archives Nationales de France*, inventory no. AJ40/272, C12, file 1.353; also Kiev, TsDavo, inventory no. 3676/1/217/42–43.
5. 19420728 Valuation of the Hartveld painting collection dated 28 July 1942 by Arthur De Heuvel. Kiev, TsDavo, inventory no. 3676/1/217/40; also submitted by the claimants (Pierrefite-sur-Seine, *Archives Nationales de France*, inventory no. AJ40/272, C12, file 1.353).
6. 19420904 Statement dated 4 September 1942 that the ERR was only interested in Hartveld's art book collection, not his paintings. Also submitted by the claimants (Pierrefite-sur-Seine, *Archives Nationales de France*, inventory no. AJ40/272, C12, file 1.353).
7. 19420910 *Arbeitsbericht* concerning the seizure of Samuel Hartveld's library. Kiev, TsDavo, inventory no. 3676/1/217/45.
8. 19430618 Release dated 18 June 1943 by the *Algemene Spaar- en Lijfrentekas* (General Savings and Annuity Fund) for the mortgage loan of Samuel Hartveld and [REDACTED] concerning Otto Veniusstraat 3. Beveren, State Archives, *Hypotheekkantoor* (Mortgage Office) Antwerp 1 70 0000 (F619A), inventory no. 89, dated 01/07/1943, line 2623.
9. 19440321 René Van de Broek obtains a mortgage loan from the Bank of Antwerp. Beveren, State Archives, Mortgage Office Antwerp 1 70 0000 (F619A), inventory no. 91, dated 18/04/1944.
10. 19450705 (Presumed forged) letter from Samuel Hartveld to René Van de Broek dated 5 July 1945, as included in the prosecutorial file. See prosecutorial file, Exhibit 22 – 19480114.
11. 19450830 “*Formulaire interne de déclaration*” dated 30 August 1945, stating that Samuel Hartveld's looted library was partially recovered in Füssen and transferred to France, but that the most important books were missing. Brussels, National Archives 2, *Dienst voor Economische Recuperatie* (DER – ORE) (Economic Recovery Service), Administration (I 20), no. 410, file 335.

12. 19451016 Payment order dated 16 October 1945 issued by Samuel Hartveld and [REDACTED] against [REDACTED] *et al.* Beveren, State Archives, Mortgage Office Antwerp 1 70 0000 (F619A), inventory no. 93, dated 23/10/1945.
13. 1945–1950 New York, The Frick Collection, Frick Art Reference Library, Central Correspondence, Dealers, S. Hartveld Gallery (NYC), 1945–1950.
14. 19460108 Inquiry dated 8 January 1946 from the Antwerp sequestration office to the *Vreemdelingsdienst* (Immigration Service) regarding Samuel Hartveld's nationality. Brussels, National Archives 2, Archives of the Sequestration of the Brüsseler Treuhandgesellschaft and Group 12, inventory nos. 267–269.
15. 19460111 Notification dated 8 January 1946 from the Sequestration Service to the Brussels office of the *Brüsseler Treuhandgesellschaft* that Samuel Hartveld declared two vases and a piano. Brussels, National Archives 2, WWII Sequestrations. Brüsseler Treuhandgesellschaft (BTG) (I 25), no. 285, folio 997.
16. 19460112 Inquiry dated 8 January 1946 from the Sequestration Service to the Antwerp Immigration Service regarding Samuel Hartveld's nationality and response dated 12 January. Antwerp, Felix Archives, Immigration Files, inventory no. 481#289982.
17. 19460410 Release by Samuel Hartveld to various debtors, heirs of Paul and Clementina Braeckmans-Peeters, who borrowed 67,000 BEF from Hartveld in 1936. Beveren, State Archives Antwerp, *Notariaat* (Notarial Records), Notary Fernand Istas (R02), inventory no. 27787, dated 10/04/1946.
18. 19460426 Response from the sequestration office to attorney Paul Speyer stating that no accounts were found in Hartveld's name. Brussels, National Archives 2, WWII Sequestrations. Brüsseler Treuhandgesellschaft (BTG) (I 25), no. 285, folio 1136.
19. 1945–1947 Claims submitted by Belgian authorities to the American government concerning the Hartveld library. Washington DC, NARA, Record Group 260, Restitution Claim Records, NAID: 34698609.
20. 19470712 Letter dated 12 July 1947 from [REDACTED] to Samuel Hartveld. Antwerp, *Letterenhuis*, inventory no. W973_B1.
21. 1947–1950 *Officiële naamlĳst der telefonen: Antwerpen, Oost- en West-Vlaanderen* (Official Telephone Directory: Antwerp, East and West Flanders), 1947, 1948, 1949, and 1950. Antwerp, Felix Archives, inventory nos. BIB-TB#19, 20, 21, and 22.
22. 19480114 Investigative file of the Military Prosecutor's Office against René Van de Broek, dismissed without further action on 14 January 1948. Beveren, State Archives, Military Prosecutor's Office Antwerp (R654A), inventory no. 9120 ZG.
23. 19481228 Acquisition file of the painting "Portrait of Bishop Antoon Triest" by the City of Ghent. Ghent, Museum of Fine Arts (MSK), inventory no. 1948-Z, containing letters from René Van de Broek dated 3 April 1943, 8 June 1948, and 15 June 1948, minutes of the Museum Commission, correspondence from the curator, and a

- note of the purchase decision by the College of Mayor and Aldermen dated 28 December 1948.
24. 19490419 Last will of Samuel Hartveld dated 19 April 1949, executed in New York. See, among others, the copy included in the application file for the recognition of [REDACTED] as a political prisoner, Exhibit 39: 19541012.
 25. 19490703 “*Au Musée d’Anvers: Le 350e anniversaire d’Antoine van Dyck*,” *Le Soir*, 3 July 1949.
 26. 19490901 Acceptance, by Antwerp municipal council resolution dated 1 September 1949, of the donation of the engraving “The Adoration of the Kings” (by Lucas Van Leyden) by Samuel Hartveld to the municipal Print Cabinet. The donation was positively advised by the Committee on Legislation and Legal Affairs in its session of 24 August 1949, after which the College of Mayor and Aldermen recommended acceptance to the Council by memorandum dated 25 August 1949. According to a report from curator [REDACTED], the engraving had already been in the possession of the Print Cabinet since 11 June 1949. The value was estimated at 500 BEF. A letter of thanks dated 30 May 1949 was sent to Otto Veniusstraat 3. See Antwerp, Felix Archives, Antwerp City Administration, inventory no. 2198#250.
 27. 19490904 Announcement of the engraving donation in *Het Nieuws van den Dag* dated 4 September 1949.
 28. 19490909 Obituary of Samuel Hartveld and acknowledgment of condolences from the family in *Le Soir* dated 9 and 16 September 1949.
 29. 19500616 Judgment of the Court of First Instance Antwerp dated 16 June 1950 appointing notaries for the liquidation and distribution of the (Belgian) estate of Samuel Hartveld and granting [REDACTED] the right of “*vooruitneming*” (preferential allocation) pursuant to the Act of 27 April 1865. *Rechtskundig Weekblad*, volume 14, 1950–51, columns 509–514.
 30. 19501115 Auction catalogue *Paintings by Old Masters, Vivarini [...] Property of the Estate of the Late Samuel Hartveld [...]*, New York, Parke-Bernet Galleries, 1950. Paris, *Bibliothèque Nationale de France*, catalogue no. FRBNF36528337. [Of the 96 lots, 13 are explicitly listed as ‘Hartveld Estate’.]
 31. 19510314 “*Constat de remise*” by attorney Werner Koll-Moreau on behalf of [REDACTED] and Sonia Hartveld concerning the American estate inventory and declaration of succession (14 March and 10 May 1951). Beveren, State Archives, Notarial Records Antwerp (R02), inventory no. 22.439 (minutes of notary [REDACTED]).
 32. 19510521 Auction catalogue *Succession de Monsieur S.H. [Samuel Hartveld], Tableaux, sculptures et objets d’art, Bruxelles, Palais des Beaux-Arts, lundi 21 mai 1951*.
 33. 19510524 Provisional (dated 24 May 1951) and final (dated 7 June 1951) adjudication of Otto Veniusstraat 3 at public auction. Beveren, State Archives,

- Notarial Records Antwerp (R02), inventory no. 22.439 (minutes of notary [REDACTED]).
34. 19510613 Inventory of the estate of Samuel Hartveld dated 13 June 1951. Beveren, State Archives, Notarial Records Antwerp (R02), inventory no. 22.439 (minutes of notary [REDACTED]).
35. 19510710 Auction catalogue of the furniture from the Hartveld estate at Antwerp auction house De Tavernier on 10 and 11 July 1951. Beveren, State Archives, Notarial Records Antwerp (R02), inventory no. 22.440 (minutes of notary [REDACTED]).
36. 19510926 Declarations of the estates of [REDACTED] and Samuel Hartveld dated 26 September 1951. Beveren, State Archives Beveren, Registration Antwerp Succession 1 0000 (F368A), inventory no. 19, folio 14.
37. 19520409 Objections and additional evidence submitted by the heirs to the notaries on 9 April 1952. Beveren, State Archives, Notarial Records Antwerp (R02), inventory no. 22.441 (minutes of notary [REDACTED]).
38. 19530629 Draft liquidation and distribution dated 29 June 1953 (and objections by the heirs). Beveren, State Archives, Notarial Records Antwerp (R02), inventory nos. 22.443 and 22.444 (minutes of notary [REDACTED]).
39. 19541012 Decision of the Fourth Chamber of the *Commission d'Agréation pour les Prisonniers politiques et Ayants Droit* of the *Ministerie van Openbare Werken en Wederopbouw* (Ministry of Public Works and Reconstruction) granting Samuel Hartveld and [REDACTED] (application resumed by their son [REDACTED]) the status of beneficiary of compensation due to the recognition of [REDACTED] as a political prisoner. Brussels, National Archives 2, Commission d'Agréation pour les prisonniers politiques et leurs ayants droit (FICC330), inventory no. 91.
40. 19541117 Final liquidation and distribution dated 17 November 1954. Beveren, State Archives, Notarial Records Antwerp (R02), inventory no. 22.446 (minutes of notary [REDACTED]).
41. 19600212 DER record dated 12 February 1960 concerning “*La chasse au sanglier*” by Frans Snijders, belonging to the Hartveld collection but “*poste supprimé de la liste BA, cf. l BA du 12.2.60* (entry removed from the BA list, cf. BA of 12.2.60.” Brussels, National Archives 2, Economic Recovery Service (ORE – DER), Administration (I 20), no. 470, record sheets 89–91.
42. 20231003 Claim submitted by [REDACTED] on behalf of the Sonia Klein Trust and the trustees and heirs [REDACTED] by letter dated 3 October 2023, with the following annexes:
- a. Power of attorney from the Sonia Klein Trust, signed by [REDACTED] and [REDACTED], authorizing attorney Hartung;
 - b. Valuation list by A. De Heuvel dated 28 July 1942 (66 works);

- c. English translation of Chapter 7 from Geert Sels, *Kunst voor Das Reich* (French edition: *Le Trésor de Guerre des Nazis*);
 - d. Scan of page 249 from Sels, *Le Trésor...*, showing images of the disputed works by Gaspar de Crayer (Ghent) and Gibbs (Tate).
- 43. 20241128 Resolution of the College of Mayor and Aldermen of the City of Ghent dated 28 November 2024 appointing the advisory commission.
 - 44. 20250328 Report of the Spoliation Advisory Panel concerning the painting “Aeneas and His Family Fleeing Burning Troy” by Henry Gibbs, held by the Tate Gallery, dated 28 March 2025.
 - 45. 20250331 Letter dated 31 March 2025 from the Federal Public Service Finance, *Patrimoniumdocumentatie* (Patrimonial Documentation Service), containing the ownership history of Otto Veniusstraat 3 from 1927 to 1967.
 - 46. 20250617 Emails dated 17 and 23 June 2025 from [REDACTED] of *Bezirksregierung Düsseldorf*, Department 15, Affairs under the BEG / Hardship Fund NRW / Federal Central Registry, addressed to Georges Martyn, confirming that no BEG claims were filed under the names of Samuel Hartveld, [REDACTED], or their children.
 - 47. 20250619 Resolution of the College of Mayor and Aldermen of the City of Ghent dated 19 June 2025 extending the mandate of the advisory commission until 30 September 2025, also authorizing the appointment of two forensic handwriting experts.
 - 48. 20250821 Letter dated 21 August 2025 from Mishcon de Reya (LLP) on behalf of [REDACTED] to the Museum of Fine Arts.
 - 49. 20250831 Report dated 31 August 2025 by forensic handwriting expert [REDACTED] concerning the letter of 5 July 1945.
 - 50. 20250916 Report dated 16 September 2025 by forensic handwriting expert [REDACTED] concerning the letter of 5 July 1945.