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Testimony presented to the **GOVERNMENT ADMINISTRATION AND ELECTIONS COMMITTEE**,
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IN OPPOSITION to SB 28 AN ACT CONSOLIDATING STATE AGENCIES AND ELIMINATING CERTAIN LEGISLATIVE COMMISSIONS.

by Robert T. Crook, Director

SB 28 would have an immeasurable negative impact on Connecticut's law-abiding gun owners by transferring operations of the Board of Firearm Permit Examiners (BFPE) to the Department of Public Safety. “(a) There shall be established a Board of Firearms Permit Examiners, within the Department of Public Safety, [for administrative purposes only,] hereinafter referred to as the board” (Sec 1.)

The Board is the primary appeals process for those aggrieved by denial or revocation of Permits by police agencies. The oversight board was established 40 years ago as an independent agency due to police abusing their discretion by formulating their own rules and standards for firearms permits. The 7 unpaid volunteers receive NO compensation, and a secretary and office expenses costs the state little < \$100,000. Placing the Board under the Dept of Public Safety and subordinating the Board to the State Police would save zero dollars.

Putting the BFPE under the State Police will allow them to control what is established as an unbiased review of police actions and due process. The State Police also will be able to rewrite the board's regulations, the rules that govern the board's procedures. Some police prefer not to issue permits to civilians and clearly regard the board as an adversary; the enmity was intensified recently when a member of the board sued the State Police in Federal court in connection with his own permit. We consider this issue as the first step toward the complete elimination of the oversight board, which many police regard as a nuisance at best.

Another serious factor is the potential loss of the single secretary. Were she replaced with another, the administrative knowledge and institutional memory of this long-term employee would be lost causing a more lengthy appeal process (currently 18 months) and more delay.

Most important, it would lead to a reduction in, if not an elimination of, the inherent fairness of the Board's operating principles which was put in place by the legislature to function as a Civilian Review Board. The public perception of the Board, as an independent autonomous body free from oversight and control of the DPS or the State Police, where any citizen can get a fair and impartial hearing, will be destroyed.

If approved, an applicant who is denied a pistol permit would have to appeal to the very body, the Department of Public Safety, which rejected the permit. The transfer of this currently independent board will make it harder for law abiding gun owners to obtain pistol permits if they have been revoked or denied without proper cause. We've heard of putting the fox into the chicken coop; this is putting the chickens into the fox's den.

We would predict more problems and costs to citizens, municipalities and the state were this transfer implemented.

Thank you.