

# WYETH ARCHITECTS LLC

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January 31<sup>st</sup>, 2011

Re: Raised Bill No. 227  
February Session 2016  
LCO No. 1659  
Referred to Committee on Environment

## AN ACT CONCERNING CECIL'S LAW

Please consider the impact of the proposed enforcement terms of this bill.

Under (b) no one may own (possess), sell or transport anything to do with the "Big Five African Species": African elephant, African lion, African leopard, and the black and white rhinoceros.

Under (c) a policeman standing at my front door might notice the 1914 Steinway piano in the living room. It has ivory keys originally manufactured in our town: Ivoryton, CT. The policeman could reasonably consider probable cause, enter my house and seize the instrument. I could be charged with a felony for possession and fined up to \$10,000 and imprisoned for up to 2 years (under (f)). If convicted, the instrument would be forfeited and destroyed (under (g)).

This is not exaggerating circumstances, it is exactly what is outlined in the Act - as written.

Most houses older than 50 years in the Town of Ivoryton, CT have some small object of ivory built-in. It was a Company Town for the Comstock Cheney Ivory Factory and retains the vestiges of its historic past. Do all the existing houses require a certificate of possession from the Commissioner of Energy (under (d))?

Are the owners of violin, cello and bass bows made before 1950+/- required to obtain a certificate of possession from the Commissioner of Energy or face felony charges? At the end of the 1800s, millions (yes, millions) of violins were imported from Europe. Many of the tuning buttons and bows have small amounts of ivory. Many of these still reside in attics and basements throughout the State. Should they all be registered? Are the owner's felons?

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Many vintage musical instruments manufactured before 1925+/- have elements of ivory: nuts, saddles, bindings or inlays. These include guitars, mandolins, banjos, harps, and even wind instruments with ivory button inlays. The Martin Guitar Company of Nazareth, PA used elements of ivory on their guitars into the 1970s. By the terms of this Act, the owner's of these fine instruments are being told that they need to be registered in order to simply possess them and they are forbidden to be sold or transported. Are collectors of antique instruments being told that their collections are now valueless? After all, the Act prohibits sale or transport.

Ivory appears in many antiques: dolls, decorative carvings, combs, lockets, Chinese decorative imports, light fixtures, jewelry boxes, furniture inlays, antique shotgun sights – the list goes on. The factory in Ivoryton, CT churned out hundreds of thousands of ivory combs, lockets, piano keys, toiletries and other similar items. These items still exist somewhere. Are their owners felons?

The existing CITES Treaties (1973) forbid the sale or transport of ivory. Enforcement falls under the responsibility of the National Fish and Wildlife Service. Knowingly violating CITES or the ESA include fines up to \$50,000 fine and/or up to 1 year imprisonment. I believe that all of the “Big Five African Species” are already covered by CITES, the Endangered Species Act, the Lacey Act or all three.

We support an end to the ivory trade. New legislation, however, should not be written to hurt existing owners or collectors of antiques or other historically or artistically significant objects.

Requiring State citizens to obtain a certificate of possession from the Commissioner of Energy for items they have long owned or inherited to avoid felony charges seems onerous and unreasonable.

Please consider that this proposed Act is already covered by existing Federal legislation. If, for some reason, you feel this act is still necessary, then please compose it in a way that does not silently create felons of law-abiding citizens.

Leonard Wyeth AIA