

My name is Ron Fromkin. I live in Florida, but was very disturbed to see legislation being considered in your state that is really absurd.

I am a restorer. I repair old ivories that are damaged and have been doing this for 24 years. Until very recently there have been no restrictions in the USA concerning the different types of ivory. It was considered legal by the regulating agencies that if it was here, it had gone through the importation process. Until 2 years ago, this was never an issue.

The poaching problem of elephant ivory in CERTAIN areas of Africa is a real problem. However many areas in Africa where poaching and government corruption is controlled, there are an abundance of elephants. In some areas, there are so many elephants, they exceed the sustainability rates by hundreds of percentage points. For example, an area that can support 500 elephants may have 2000.

Please consider the following before you get sucked into this potential law for your citizens. Turning law abiding citizens into felons for possessing an object that has been legal for countless years is a very poor idea.

1. It is an absolute fact that almost all poached ivory goes to Asia, primarily China. The Fish and Wildlife service has admitted there is almost no illegal ivory coming to the USA. Why? Because there is a huge supply of raw and carved ivory here. Raw ivory in the USA costs approximately \$75-100 a pound. In China and other areas in Asia, ivory is \$1600 a pound.

2. Recent anti ivory laws being considered or passed in other states do not save one elephant's life, and they will not, because the problem is not here. Rules and laws being considered or passed claim to be fair to ivory owners. The fact is that no one could comply with these rules or laws. There are so many requirements for non-existent documents and proof of provenance that the real goal is to make legal ivory illegal.

3. How will outlawing ownership or transfer of a item of ivory legally in the USA save any elephants?

4. Is Connecticut and other Government agencies prepared to pay owners of ivory objects fair compensation under the Takings clause of the 5th amendment? By making a legal piece of personal property illegal, you have made it worthless. If the government makes a perfectly legal object illegal and therefore worthless, they should be prepared to compensate the owners for their loss.

5. The outright lies and misinformation being produced by the NGO wildlife groups and some government agencies is outrageous. The lack of understanding about this issue by legislators is equally shocking. Law makers in New York and New Jersey have made complete fools out of themselves for not really learning the facts about the problem of poaching and smuggling. By not discussing the issues with people outside of the NGO's and Government, they have made decisions on very bad information. New Jersey outlawed mammoth ivory. Mammoth have been extinct for 10,000 years.

6. I am sure the New York legislators were so busy patting themselves on their backs for " saving the elephants" they forgot to learn the facts. If anyone who would be a party to this ill conceived law were to sit down with experts in the field ( Dan Stiles, a world recognized expert on this topic is one of many experts) of poaching, movement of illegal ivory and the impact of this type of legislation on collectors, dealers, museums, hobbyists and other craftsmen, they would not move forward with this.

7. It is well known that attempts by animal rights groups to push Federal rules like this have been stalled by Congress. Once the congressmen heard the facts about this, they stopped any further attempt by Fish and wildlife to put these rules into effect. The NGO's decided to go State by State to push their agenda. Again- Show me the statistics that show how many elephants were saved.

8. This is a complex problem. Ivory in the USA is worth billions of dollars and has historical significance. By making an old legal antique or vintage piece of ivory illegal to own will not save one elephant and turning taxpaying citizens into felons for owning something Grandma gave them does not really sit well.

9. Ask your State Fish and wildlife enforcement officials to produce documentation about illegal ivory being brought into or sold in the USA. A handful of insignificant cases are all they can produce, some many years old. The fact is, there is no problem. Once you look at the individual cases, you will realize you were sold a bill of goods. There are many fixes to save elephants being poached, but the solutions are not here.

10. My business as a restorer has dropped off about 80% in the last 2 years because of the POTENTIAL of changes to rules and laws concerning ivory.

11. Governments including the United States have put on big shows to destroy stockpiles of ivory. Had that ivory been sold at a regulated auction ( China and Japan are the primary buyers) , there would be enough ivory for their carving demands in those countries for many years and literally many millions of dollars generated to fight poaching and smuggling out of Africa.

12. No one I know, either collectors or dealers have any interest in any poached ivory coming out of Africa. Carvings are crude and have no real artistic value. Tusks are numerous in the United States and are not a high demand item.

13. One last thought- Diamonds or rare wood or gold are all in high demand and have always been desirable. If a group came to you tomorrow and said the diamonds, or wood or gold are killing the miners or tree cutters. The land or amazon is being destroyed and the resource being decimated. If they said we want a law to outlaw diamonds, or wood or gold unless you can prove where it came from and we need a lot of regulations to save the land and stop these crimes. If you can't document your wife's diamond ring, or show when it was brought to the USA or where the wood on your coffee table came from or receipts for the ring your grandmother gave to you, it should be outlawed and anyone who did not comply should be convicted of a felony. You would not even consider such foolishness. Ivory is a commodity and has great historical and financial value. There are very strict laws in place and have been for many years concerning importation of ivory to the USA and other countries. Until 2 years ago you could buy and sell and possess ivory here as it was accepted if it was here, it was legal. For any Government to try and push new laws concerning a problem that does not exist here makes no sense. Talk to some people that actually have solutions to the poaching problem rather than taking away my freedom and that of millions of others ..