

Ivory Position Statement

At James D. Julia Auctioneer's we have a commitment to complying with all Federal Laws and Regulations. In February of 2014, President Obama issued an Executive Order regarding the commercial marketing of Asian and African elephant ivory. At this point in time, the Executive Order still has not become law however since that time the U.S. Fish & Wildlife Service website has continually updated new interpretations of the regulations and how they will be enforced. It is still legal for gun dealers to buy, sell, collect, and hold certain guns which are mounted or ornamented with ivory. As a result of a great deal of interaction with ivory specialists, legal counsel and research on the matter; all offerings sold in our auction will comply with current regulations.

Julia's approach is to be conservative in our position for marketing ivory and to be certain that our understanding and interpretation of the law is in keeping with the current law and regulations. Our conservative approach is to make certain to protect the consignor, the buyer, and Julia's. Our current interpretation is as follows:

	Export	Interstate Sale (across state lines)
Asian Elephant	Objects containing Asian elephant ivory must be at least 100 years old or older. (Seller must prove).	Objects containing Asian elephant ivory must be at least 100 years old or older. (Seller must prove).
African Elephant	CITES pre-convention worked ivory including antiques that meet CITES permitting requirements. (Seller must demonstrate).	Objects that are 100 years old or older or ivory lawfully imported prior to the date the African elephant was listed in CITES appendix 1 (January 18 th , 1990). (Seller must demonstrate) Ivory imported under a CITES pre-convention certified (seller must demonstrate).

The important point with ivory sales now as opposed to pre-February 2014 is that the seller must Prove the ivory complies with the above statements in order to lawfully sell. U.S. Fish & Wildlife website indicates in order to properly prove that an item is legal to commercially sell and export, there should be a certificate prepared certifying that it complies with law. These certificates are referred to as ESA certificates and they must be prepared only by qualified individuals who can:

- a) Differentiate between Asian ivory and African ivory.
- b) The contents of the ESA document must also prove that the general age of the ivory.

ESA documents can be acquired by hiring Mr. John Sexton, 1962 Portage Landing North, North Palm Beach, FL 33408. Mr. Sexton is a long time appraiser, a member of the ASA and meets qualifications designated by U.S. Fish & Wildlife agency as an individual qualified to prepare ESA documents. His fee is \$1,500 for each ESA document. John Sexton is an independent consultant with an appropriate U.S. Government qualifications to prepare ESA statements. ESA statements prepared by John Sexton can be acquired for a cost of \$1,500/each. It is the buyer's responsibility to make payment to John Sexton for

ESA statements. The documents are prepared by John Sexton and not James D. Julia Auctioneers. Once the statements are prepared, a copy will be presented to Julia's and they will then present you with the ivory mounts for this gun. Another copy should be kept for your records. Any item designated as ivory in our catalog description and being offered for sale is done so only because it complies with current regulations and must be accompanied by an ESA document. If the lot does not already include an ESA document, the buyer must hire John Sexton to prepare one. Without the ESA, we will not release the ivory to the buyer. They will receive the gun only without the ivory.

In closing, James D. Julia is committed to comply with all Federal laws and regulations. The change in regulations does not prohibit collectors from buying and selling ivory but it does establish new standards of proof and our approach is to continue to sell our consignors goods but to strictly follow those new standards of proof.

All of this pertains only to objects that have ivory. Any such object in our auction shall have a special green identification tag and also be noted on our addenda.

Also, please note: There are certain states that have far more restrictive ivory laws. Currently we are aware of California, New York, and New Jersey. We cannot and will not ship items containing ivory to any of these 3 states.