

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF NEW YORK**

IVAN ANTONYUK, GUN OWNERS OF)
AMERICA, INC., GUN OWNERS)
FOUNDATION, and GUN OWNERS OF)
AMERICA NEW YORK, INC.,)

Plaintiffs,)

Civil Action No. 1:22-cv-00734-GTS-CFH

v.)

KEVIN P. BRUEN, in his Official)
Capacity as Superintendent of the New)
York State Police,)

Defendant.)
_____)

SUPPLEMENTAL DECLARATION OF IVAN ANTONYUK

1. My name is Ivan Antonyuk. I am a U.S. citizen and resident of New York and live in Schenectady New York. I am a member of Gun Owners of America, Inc.

2. I make this declaration in support of Plaintiffs’ Complaint for Declaratory and Injunctive Relief. Unless otherwise stated, I make this declaration based on personal knowledge. If called as a witness, I can testify to the truth of the statements contained therein.

3. In my previous declaration filed in this matter, I stated that “I want to continue to lawfully carry my handgun in public, which I have done since 2009.”

4. I routinely take my firearm to places that will become off-limits under this new law.

5. For instance, when I go to doctor’s office for myself or when I take my son to the doctor, I carry my firearm with me if the building is not posted. I understand that this would be considered

a “location providing health” services, and thus now a felony if I carry there after September 1, 2022. Furthermore, my doctor cannot even permit me to carry there, because there is no exception, even if he posts a sign saying firearms are welcome.

6. I routinely attend church, and I wish to carry a firearm as it is currently not illegal for me to do so.

7. Like many Americans, my family and I visit numerous parks, municipal parks, and playgrounds where carry is not otherwise already unlawful, and I wish to continue to carry in parks that are not currently off limits.

8. I wish to be able to shop at Walmart and numerous other retail locations without having to disarm, ask, and/or wait for them to post a sign saying carrying a firearm is permitted.

9. I also compete in pistol competitions, but my understanding is that the challenged law will make “sporting events” off limits now, and therefore it would be impossible to compete in a pistol competition, as one cannot shoot without a firearm.

10. When I go to the movies, I no longer bring my firearm, because the new law makes it a felony.

11. I also like to go out to eat with family and friends, but now any restaurant that serves alcohol, even though I am not consuming alcohol, automatically becomes off limits, and a felony if I carry there.

12. I wish to be able to carry in parks, shopping malls, museums, libraries, hotels, restaurants, bars, car dealerships, hospital/healthcare facilities, pharmacies, and all the very normal and quite regular places in which I currently carry.

13. Additionally, I would like to carry my firearm when I use public transportation. For example, under the new law, I am not able to book a flight for an out-of-state shooting event, because I cannot take my gun to the airport, even in my checked baggage.

14. Additionally, I wish to gather with other gun owners to discuss important political topics and our constitutional rights, and wish to be able to have firearms present when doing so.

15. Additionally, I object to the government seizing my property for its own anti-gun use, and instructing me that I must conspicuously post a sign on my house to advertise that firearms are welcome on my property. In doing so, I am required to advertise that I most likely possess firearms, thus making myself a target for criminals and those who do not support Second Amendment rights.

16. If businesses do not want firearms in their business, then they can post something that says firearms are not allowed, but unfortunately only the law-abiding citizens follow such rules, and criminals do not.

17. There are places I know that are already off limits for carrying firearms, and have long been that way, such as court houses, schools, and post offices. But the remaining entirely non-sensitive locations in the challenged law should not be off limits to me as I have complied with all of the requirements to carry a firearm.

18. Additionally, the new law and official interpretations thereof have been unclear as to whether the new training mandate applies to those who, like me, currently possess a license. To the extent that it does, I object to the state's mandate that I expend significant time and resources to obtain additional training, when I have already for many years proven myself to be a law abiding and responsible gun owner.

19. Finally, I object to the law's ongoing requirement that I be determined to have "good moral character" in order to continue to be a licensed firearms carrier.

I declare under penalty of perjury that the foregoing is true and correct.

8/22/2022

Date

Ivan Antonyuk

Ivan Antonyuk