

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

IVAN ANTONYUK, et al.	)	
	)	
Plaintiffs,	)	
	)	Civil Action No. 1:22-cv-00986 (GTS/CFH)
v.	)	
	)	
KATHLEEN HOCHUL, in her Official	)	
Capacity as Governor of the State of New	)	
York, et al.	)	
	)	
	)	
Defendants.	)	
_____	)	

---

**DECLARATION OF STEPHEN D. STAMBOULIEH**

---

Pursuant to LR 7.1(a)(2) and Fed. R. Civ. P. 65.1, I Stephen D. Stamboulieh, declare and state as follows:

1. I am counsel of record for Plaintiffs in this matter.
2. Pursuant to Fed. R. Civ. P. 65(a)(1), I have provided notice to all adverse parties of the filings in this matter seeking a temporary restraining order and preliminary and permanent injunction against Defendants' Concealed Carry Improvement Act.
3. After filing and the docketing of this matter, I emailed a copy of the as-filed Complaint, with exhibits, to all Defendants except for Defendant Judge Matthew J. Doran to which I faxed a copy of the Complaint, with exhibits, to his listed fax number: 315-671-1190. The other Defendants, and the email addresses to which I sent the filings, are as follows:

**The Honorable Kathy Hochul**  
Governor of New York State

NYS State Capitol Building  
Albany, NY 12224  
Phone: 518-474-8390  
c/o James M. Thompson, Special Counsel for Second Amendment Litigation  
[james.thompson@ag.ny.gov](mailto:james.thompson@ag.ny.gov)  
Michael McCartin, Assistant Attorney General  
[michael.mccartin@ag.ny.gov](mailto:michael.mccartin@ag.ny.gov)

**Kevin P. Bruen**  
Superintendent NYS Police  
[nyspmail@troopers.ny.gov](mailto:nyspmail@troopers.ny.gov)  
1220 Washington Ave., Building 22  
Albany, NY 12226  
Phone: 518-783-3211

**William Fitzpatrick, Onondaga County District Attorney**  
Criminal Courthouse 4<sup>th</sup> floor  
505 South State Street  
Syracuse, NY 13202  
Phone: 315-435-2470  
Fax: 315-435-3969  
[Williamfitzpatrick@ongov.net](mailto:Williamfitzpatrick@ongov.net)  
[michelerobbins@ongov.net](mailto:michelerobbins@ongov.net)

**Eugene Conway**  
**Onondaga County Sheriff's Office**  
407 S. State St.  
Syracuse, NY 13202  
Phone: 315-435-3044  
Fax: 315-435-2942  
[eugeneconway@ongov.net](mailto:eugeneconway@ongov.net)

**Joseph Cecile, Chief of Police of Syracuse**  
511 S State Street  
Syracuse, NY 13202  
315-442-5200  
Via Syracuse Law Department:  
[law@syrgov.net](mailto:law@syrgov.net)

**P. David Soares, District Attorney Albany County**  
6 Lodge Street  
Albany, NY 12207  
518-487-5460; Fax 518-487-5093  
[david.soares@albanycountyny.gov](mailto:david.soares@albanycountyny.gov)

**Gregory Oakes, Oswego County District Attorney**

Public Safety Bldg., 39 Churchill Road  
Oswego, NY 13126  
Phone 315-349-3200; fax 315-349-3212  
[gregory.oakes@oswegocounty.com](mailto:gregory.oakes@oswegocounty.com)

**Don Hilton, Oswego County Sheriff**  
39 Churchill Road  
Oswego, NY 13126  
Phone: 315-349-3304; Fax 315-342-3519  
[don.hilton@oswegocounty.com](mailto:don.hilton@oswegocounty.com)

**Joseph Stanzone, Greene County District Attorney**  
411 Main Street, 3<sup>rd</sup> Floor  
Catskill, NY 12414  
Phone: 518-719-3590; Fax 518-719-3792  
[districtattorney@discovergreene.com](mailto:districtattorney@discovergreene.com)

**Hon. Matthew J. Doran, County Court Judge**  
Onondaga County  
Phone: 315-671-1054  
Fax: 315-671-1190  
Onondaga Supreme & County Court Clerk's Office  
505 South State Street, Suite 110  
Syracuse, NY 13202  
[mdoran@nycourts.gov](mailto:mdoran@nycourts.gov)

4. None of the emails was returned as undeliverable or otherwise bounced back and I received a confirmation that the fax to Defendant Doran was sent successfully.<sup>1</sup>

5. Additionally, I sent the Complaint with exhibits, the issued summons, and the Court's General Order to be served on the Defendants on an expedited basis.

6. Pursuant to LR 65.1, the instant application includes the Motion for Temporary Restraining Order and Preliminary Injunction and Permanent Injunction, a copy of the Complaint (with exhibits), the Memorandum of Law, and a proposed order granting the injunctive relief.

---

<sup>1</sup> I was provided Judge Doran's email address this afternoon, and thus, will email these filings to his email address instead of using his fax number.

7. After filing of the application, I emailed the Motion, the Memorandum, the proposed Order to Show Cause, and this Declaration to the above-listed email addresses, and sent a copy by United States Postal Service to all listed defendants at the addresses above.

8. This declaration is intended to comply with Fed. R. Civ. P. 65(a)(1), LR 5.1(a), and LR 7.1(a)(2) ensuring that Plaintiffs' counsel has made good faith efforts to provide notice to Defendants of this TRO application by providing them with the documents filed with this Court.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: September 22, 2022

/s/ Stephen D. Stamboulieh  
**Stephen D. Stamboulieh**

**CERTIFICATE OF SERVICE**

I, Stephen D. Stamboulieh, hereby certify that I have on this day, caused the foregoing document or pleading to be mailed by United States Postal Service and emailed, to the following non-ECF participants:

The Honorable Kathy Hochul  
Governor of New York State  
NYS State Capitol Building  
Albany, NY 12224  
Phone: 518-474-8390  
James M. Thompson,<sup>2</sup> Special Counsel for Second Amendment Litigation  
[james.thompson@ag.ny.gov](mailto:james.thompson@ag.ny.gov)  
Michael McCartin, Assistant Attorney General  
[michael.mccartin@ag.ny.gov](mailto:michael.mccartin@ag.ny.gov)

Kevin P. Bruen  
Superintendent NYS Police  
[nyspmail@troopers.ny.gov](mailto:nyspmail@troopers.ny.gov)  
1220 Washington Ave., Building 22  
Albany, NY 12226  
Phone: 518-783-3211

William Fitzpatrick, Onondaga County District Attorney  
Criminal Courthouse 4th floor  
505 South State Street  
Syracuse, NY 13202  
Phone: 315-435-2470  
Fax: 315-435-3969  
[Williamfitzpatrick@ongov.net](mailto:Williamfitzpatrick@ongov.net), [michelerobbins@ongov.net](mailto:michelerobbins@ongov.net)

Eugene Conway  
Onondaga County Sheriff's Office  
407 S. State St.  
Syracuse, NY 13202  
Phone: 315-435-3044  
Fax: 315-435-2942  
[eugeneconway@ongov.net](mailto:eugeneconway@ongov.net)

Joseph Cecile, Chief of Police of Syracuse  
511 S State Street

---

<sup>2</sup> Messrs. McCartin and Thompson previously represented Defendant Bruen in the previous *Antonyuk v. Bruen* matter.

Syracuse, NY 13202  
315-442-5200  
Via Syracuse Law Department:  
[law@syrgov.net](mailto:law@syrgov.net)

P. David Soares, District Attorney Albany County  
6 Lodge Street  
Albany, NY 12207  
518-487-5460; Fax 518-487-5093  
[david.soares@albanycountyny.gov](mailto:david.soares@albanycountyny.gov)

Gregory Oakes, Oswego County District Attorney  
Public Safety Bldg., 39 Churchill Road  
Oswego, NY 13126  
Phone 315-349-3200; fax 315-349-3212  
[gregory.oakes@oswegocounty.com](mailto:gregory.oakes@oswegocounty.com)

Don Hilton, Oswego County Sheriff  
39 Churchill Road  
Oswego, NY 13126  
Phone: 315-349-3304; Fax 315-342-3519  
[don.hilton@oswegocounty.com](mailto:don.hilton@oswegocounty.com)

Joseph Stanzione, Greene County District Attorney  
411 Main Street, 3rd Floor  
Catskill, NY 12414  
Phone: 518-719-3590; Fax 518-719-3792  
[districtattorney@discovergreene.com](mailto:districtattorney@discovergreene.com)

Hon. Matthew J. Doran, County Court Judge  
Onondaga County  
Phone: 315-671-1054  
Fax: 315-671-1190  
Onondaga Supreme & County Court Clerk's Office  
505 South State Street, Suite 110  
Syracuse, NY 13202  
[mdoran@nycourts.gov](mailto:mdoran@nycourts.gov)

Dated: September 22, 2022

/s/ Stephen D. Stamboulieh  
Stephen D. Stamboulieh