

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF SUFFOLK

-----X
Kyle Cronin

Plaintiff,

-against-

Attorney General of The State of New York

Defendant.
-----X

Index No. _____

Date Summons filed _____

Plaintiff designates _____

County as the place of trial

The basis of venue is:

To the above named Defendant:

YOU ARE HEREBY SUMMONED to answer the complaint in this action and to serve a copy of your answer on this Plaintiff OR Plaintiff's Attorney(s) within twenty (20) days after the service of this summons, exclusive of the day of service, where service is made by delivery upon you personally within the state, or within thirty (30) days after completion of service is made in any manner. In case of your failure to appear or answer, judgment will be taken against you by default for relief demanded in the complaint.

Dated _____

Plaintiff

Attorney(s) for Plaintiff

Address:

Phone No: _____

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF SUFFOLK

-----X

Plaintiff(s)
Kyle Cronin

Index No. _____

-against-

COMPLAINT

Defendant(s)
Attorney General of The State of New York

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I (Plaintiff) Kyle Cronin respectfully shows and alleges the following:

1. I (Plaintiff) Kyle Cronin am a resident of the State of New York. I (Plaintiff) reside at [REDACTED] I (Plaintiff) am filing this action Pro Se.

2. The New York Law CPL (Criminal Procedure Law) Section 400 Blatantly Violates The People’s Right To Keep and Bear Arms as guaranteed by The Second Amendment of The Constitution of The United States of America by limiting the pistol permit age to twenty-one or older and issuing selectively on a may-issue basis.

3. The New York Law CPL (Criminal Procedure Law) Section 265 also violates The People’s Right To Keep and Bear Arms as an extension of Criminal Procedure Law Section 400 by criminalizing the possession of a pistol in spite of 27 states already recognizing the People’s Constitutional

Right to Carry. This law serves to undermine the people's access to basic means of self defense and stands in the way of the Constitutional guarantees of Life, Liberty, and the Pursuit of Happiness.

4. The New York Law CPLR (Civil Practice Law and Rules) Article 63-a or New York's "Red Flag Laws" (Extreme Risk Protection Order) and (Temporary Extreme Risk Protection Order) is a direct violation of the Second Amendment's guarantees of The People's Right To Keep and Bear Arms. NOT only is CPLR Article 63-a in violation of The Second Amendment of The Constitution of The United States of America, it is also in violation of the Fourth, Fifth and Fourteenth Amendments of The Constitution of The United States of America. CPLR Article 63-a allows a local Police Department of the State of New York to seize firearms from a person's home based on the allegation of said person(s) being a "danger to self or others". CPLR Article 63-a allows the seizure of property without due process of the law. In *G.W. v C.N (Monroe County, New York)* CPLR Article 63-a was ruled Unconstitutional As of December 22nd, 2022.

5. CPL Section 400, CPL Section 265 and CPLR Article 63-a are all a blatant and direct infringement on the Second Amendment of The Constitution of The United States of America. The Second Amendment of The United States of America states that "The People's Right To Keep and Bear Arms SHALL NOT Be Infringed. CPL Section 400, CPL Section 265 and CPLR Article 63-a Infringe on that right guaranteed by the Constitution of The United States of America.

6. The Second Amendment of The United States Constitution is a FIRST CLASS right. It is integral for the survival of The Freedoms Granted by The Constitution of The United States that the Second Amendment is Protected at All Costs. CPL Section 400, CPL Section 265 and CPLR Article 63-a are all laws designed with the sole purpose to subvert the people's right to keep and bear arms. The purpose of this action is to

challenge the constitutionality of CPL Section 400, CPL Section 265 and CPLR Article 63-a in a Court of Law.

7. I, Kyle Cronin (Plaintiff) am seeking legal action from the Supreme Court of the State of New York to repeal CPL Section 265, CPL Section 400 and CPLR Article 63-a and to establish the People's Right to conceal carry a handgun as guaranteed in the Second Amendment which states "A well regulated Militia, being necessary to the security of a free State, the right of the people to keep and bear Arms, SHALL not be infringed." It is the people's right to keep and bear arms with zero exemptions as the Second Amendment is a first class right. I am seeking to repeal the age restriction of 21 on handguns as per historical tradition. Any adult aged 18 or older should be allowed to Keep and Bear arms. I am also seeking to legalize Constitutional Carry of Concealed Firearms as recognized by twenty-seven states.

8. As an elected official, the Attorney General of the State of New York is bound by oath to uphold the Constitution yet by allowing this law to exist, the Attorney General of the State of New York is complicit in subverting and undermining the United States Constitution. In doing so, the Attorney General of the State of New York is undermining the American Values of Life, Liberty and the Pursuit of Happiness by stripping away the last means that We the People have to check Government Abuse of Power.