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June 24, 2026

VIA HAND DELIVERY



Steve Pirro, Chairperson
Town of Camillus Zoning Board of Appeals
4600 West Genesee Street
Syracuse, NY 13219

Re: Camillus Sportsmen's Club, Inc.

Dear Chairperson Pirro:

Enclosed herein is a Certificate of Imminent Peril pursuant to Town Law Section 267-a(6) and accompanying Affidavit of Town Code Enforcement Officer Gregg Humphrey swearing to the facts associated therein.

Town Law Section 267-a(6) reads as follows:

> 6. Stay upon appeal. An appeal shall stay all proceedings in furtherance of the action appealed from, unless the administrative official charged with the enforcement of such ordinance or local law, from whom the appeal is taken, certifies to the board of appeals, after the notice of appeal shall have been filed with the administrative official, that by reason of facts stated in the certificate a stay, would, in his or her opinion, cause imminent peril to life or property, in which case proceedings shall not be stayed otherwise than by a restraining order which may be granted by the board of appeals or by a court of record on application, on notice to the administrative official from whom the appeal is taken and on due cause shown.

As such, we respectfully request the Town of Camillus Zoning Board of Appeals to recognize CEO Humphrey's Certificate of Imminent Peril and vacate the stay of enforcement subject to the Camillus Sportsmen's Club right to seek a restraining order pursuant to the underlying statute.

Furthermore, enclosed is a report of Charles P. Stephenson of the Orion Group who conducted a preliminary review and trajectory analysis involving an incident that occurred on October 14, 2025 at 208 Arch Stone Way, Camillus, New York.

Finally, please note the Camillus Sportsmen's Club still has not responded to the Subpoena Duces Tecum that was served on March 10, 2026.

Very truly yours,

COSTELLO, COONEY & FEARON, PLLC

James J. Gascon

JJG/ljs
Enclosures
cc (w/enc.): Paul Curtin, Esq. (via email)
Hal DeBoer (via Hand Delivery)

STATE OF NEW YORK
ZONING BOARD OF APPEALS TOWN OF CAMILLUS

In the Matter of CAMILLUS SPORTSMEN'S CLUB, INC.
5801 Devoe Road
Camillus, New York 13031
Tax Map No. 021.-04-12.1
Appeal to the Town of Camillus Zoning Board of Appeals from an October 22, 2025 Order to Cease and Desist

AFFIDAVIT OF GREGG HUMPHREY AND CERTIFICATE OF IMMINENT PERIL PURUSUANT TO TOWN LAW § 267-a(6)

STATE OF NEW YORK)
COUNTY OF ONONDAGA)ss.:

GREGG HUMPHREY, being duly sworn, deposes and says:

1. I am the duly appointed Code Enforcement Officer for the Town of Camillus, New York (the "Town") and am charged with the enforcement of the Municipal Code of the Town of Camillus

2. I submit this Affidavit in support of my certification pursuant to Town Law § 267-a(6) that the continued outdoor range activities of the Camillus Sportsmen's Club (the "Club") constitutes an imminent peril to life or property and such stay imposed by way of the Club's December 19, 2025 Appeal of the Town of Camillus Code Enforcement Office's Cease and Desist Order to the Town of Camillus Zoning Board of Appeals ("ZBA") be vacated pending outcome of the Appeal.

3. As thoroughly detailed in my previous affidavits sworn to on or about May 27, 2026 and June 5, 2026, respectively, the continued use of the Club's outdoor range facilities creates an imminent peril to residents, and property, of down-range neighborhoods. I incorporate said affidavits, in their entirety herein, which detail the results of the Town Code Enforcement Office's investigation.

4. As supported by the facts set forth herein and in my prior affidavits submitted to the ZBA in these proceedings, in order to prevent stray bullets or projectiles from leaving the Club and striking residential structures down-range, I submit this Certificate of Imminent Peril pursuant to Town Law § 267-a(6) vacating any stay imposed by the Club's Appeal.

5. In my Supplemental Affidavit sworn to on or about June 5, 2026, I set forth my opinion that the Camillus Sportsmen's Club outdoor gun range activities represent an imminent threat to the health, safety and welfare of the general public, the Town of Camillus and its residents. (*see* G. Humphrey Supp. Aff. at ¶ 27).

6. Furthermore, in addition to representing an imminent danger to the health, safety and welfare of the general public, the law enforcement training activities being performed at the outdoor range facility constitute a violation of the Municipal Code of the Town of Camillus. (*see* G. Humphrey Supp. Aff. at ¶ 28).

7. In addition, the Club was ordered to cease and desist further alterations to the site and/or buildings or structures that would expand their non-conformity or erecting buildings and/or structures on the site. Nevertheless, such alterations to the site, including expansion/relocation of the outdoor ranges, can be observed from publicly available historical aerial imagery of the Club and have been admitted by Club President Hal DoBoer in multiple public forums including at Town of Camillus Town Board meetings and in the media. (*see* G. Humphrey Aff. at ¶ 25; G. Humphrey Supp. Aff. at ¶ 36).

8. The Club was notified of these violations in a March 6, 2026 Notice of Violation and Order to Remedy, which stated that the Club had altered the site to expand the outdoor ranges, including by erecting or modifying structures, in violation of Chapter 30 of the Code of the Town

of Camillus; Article XI, Sections 1101 A, 1101 B, and 1101 C; Article XII, Section 1205 C; and Article XIII, Section 1303.[1]

9. In furtherance of my certification of imminent peril, following issuance of the Town's Cease and Desist Order, the Club voluntarily complied for a number of months and during that period of time there were *no complaints* of bullet strikes to residential homes located down-range from the Club. (*see* G. Humphrey Supp. Aff. at ¶ 35). This is a remarkable contrast to the ten (10) reported bullet strikes/found bullets which occurred within a six (6) month period of time between May 20, 2025 and October 14, 2025 -- five (5) of which took place during the month of October 2025 and within approximately a nine (9) day period. (*see* G. Humphrey Aff at ¶ 10; G. Humphrey Supp. Aff. at ¶ 25).

10. Without the Club's agreement to Club to undertake remedial safety measures, approved by a third-party gun range expert and in compliance with the procedures and approvals set forth in the Town of Camillus Town Code, for the protection and benefit of the health, safety and welfare of the community, it is my opinion that the Club's outdoor range facilities constitute an imminent peril to life or property.

11. I have also reviewed the report of Charles P. Stephson of the Orion Group – a certified Use of Force/Fireman's Instructor, dated June 23, 2026, who recommends the Cease and Desist Order remain in place pending additional investigation.

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1 While the Club has not appealed the March 6, 2026 Notice of Violation and Order to Remedy to the ZBA in this present action, such violations provide additional background to the Cease and Desist order and the continuing nature of the Club's refusal to comply with directives of the Town's Code Enforcement Office.

12. For the reasons stated herein, I respectfully request the ZBA uphold the Order to Cease and Desist all outdoor range activities, with the exception of trap and skeet shooting, and direct the Club to comply with the Town of Camillus Zoning Regulations, and direct the Club to undertake remedial safety measures, approved by a third-party gun range expert and in compliance with the procedures and approvals set forth in the Town of Camillus Town Code, for the protection and benefit of the health, safety and welfare of the community. Until such time, it is my opinion that the outdoor range activities of the club constitutes an imminent peril to life or property and such stay imposed by way of the Club's Appeal be vacated pending outcome of the Appeal by the Town of Camillus Zoning Board of Appeals ("ZBA").

6/24/26

GREGG HUMPHREY, TOWN OF CAMILLUS
CODE ENFORCEMENT OFFICER

Subscribed and sworn to before me
this 24th day of June, 2026.

Notary Public

JAMES J. GASCON
Notary Public, State of New York
No. 02GA6329032
Qualified in Onondaga County
My Commission Expires October 1, 2027