

PIMA COUNTY SUPERIOR COURT 110 W CONGRESS ST TUCSON, AZ 85701 (520) 724-3201

Plaintiff <input type="checkbox"/> Employer-Plaintiff if Workplace Injunction CITY OF TUCSON PARKS AND RECREATION	Defendant PAUL KEMNITZ	Case No. C20264557
<input type="checkbox"/> On behalf of minor/person in need of protection named:	Defendant's address UNKNOWN, TUCSON, AZ, 85716	<p style="text-align: center;">PETITION for:</p> <input type="checkbox"/> Order of Protection <input type="checkbox"/> Injunction Against Harassment <input checked="" type="checkbox"/> Workplace Injunction
Agent's Name (if Workplace Injunction) LARA HAMWEY	Defendant's birth date 02/03/1969	
	Defendant's phone	

This is NOT a court order.
 This petition contains Plaintiff's allegations and requests. To see what the court has ordered, see "Order" form.

DIRECTIONS: Please read the Plaintiff's Guide Sheet before filling out this form.

- Defendant/Plaintiff Relationship.** Choose the options that best describe your relationship to the defendant. *If you are applying on behalf of another person, choose the relationship between the other person and the defendant.

<input type="checkbox"/> Married (past or present) <input type="checkbox"/> Live/lived together as intimate partners <input type="checkbox"/> Parent of child in common <input type="checkbox"/> One party is pregnant by the other <input type="checkbox"/> Romantic/sexual (past or present)	<input type="checkbox"/> Related as parent, grandparent, child, grandchild, brother, sister (or in-law/step) <input type="checkbox"/> Live/lived together but not as intimate partners <input checked="" type="checkbox"/> Other (describe): _____
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- If checked, Defendant and I have a pending action involving maternity, paternity, annulment, legal separation, dissolution, custody, parenting time, or support in _____
 Case # _____
- Name of court, if any, in which any other protective order related to this conduct has been filed.
 Court name _____ Case # _____

(Continue to next page)

4. Tell the judge what happened and why you need this order. PRINT both the dates and a brief description of what happened. If there is a contested hearing, a judge can only consider what you write here.

NOTE: Defendant will receive a copy of this petition when the order is served.

Approx. Date	(Do not write on back or in the margin. Attach additional paper if necessary.)
6/19/2025	During the period leading up to Defendants separation from employment, the City held multiple meetings with Defendant in an effort to address and de-escalate his conduct. Throughout those meetings, Defendant was negative, agitated, and resistant to efforts to resolve the situation.rnAt the conclusion of a Notice of Intent meeting handled by Human Resources, Defendant stated, If they do this, they will regret it. When asked whether that statement was a threat, Defendant said it was non-violent, but he would make sure there was regret for the decision. Because staff understood this statement as threatening and retaliatory, law enforcement officers were present at the termination meeting, and staff were escorted to their vehicles afterward for safety.rnThe Citys response to this incident included security measures such as controlled badge access, visitor screening cameras, exterior cameras, and staff safety instructions regarding communication protocols and calling 911 if Defendant appeared at the worksite.rn
1/29/2026	In January 2026, Defendant pursued a Civil Service appeal seeking reinstatement to his position. That appeal was unsuccessful, and the termination decision was upheld.rnOn or about January 29, 2026, after the appeal was denied, Defendant began a social media campaign targeting the City of Tucson, the Parks and Recreation Department, and specific employees, including Lara Hamwey, Greg Jackson, John Bonillas, Corey Martinez, and John Mancine. The campaign was intended to discredit the Department and publicly and directly target personnel connected to Defendants termination.rnIn one of the initial posts from Defendants personal Facebook account to the City of Tucson Parks and Recreation Facebook page, Defendant stated: I plan to launch nonviolent hell. I will haunt them politically as long as they are in positions of power. Its on, like Donkey Kong. Staff understood this language as retaliatory, intimidating, and directed at employees because of their official roles.rn
1/30/2026	At a minimum, the Citys Public Information Team has documented 157 known comments posted by Defendant on City of Tucson pages and other Facebook pages targeting the City of Tucson and specific City employees. The volume and repetition of these posts have made tracking potential threats labor-intensive and have amplified staff concern about Defendants fixation on the Department and its personnel.rnThrough posts and videos, Defendant has created a sustained platform for repeated attacks on the Department and its employees. This conduct has caused workplace concern not only for the employees initially targeted, but also for front-desk personnel, public information staff, and field employees who now fear in-person confrontations and copycat behavior from members of the public. The effect has been to make the work environment feel unsafe for employees performing official duties.rn
2/19/2026	Following his termination and continuing through the present, Defendant has repeatedly posted comments and videos from his personal Facebook profile and related social media pages concerning his termination and the Parks and Recreation Department. on February 19, 2026 the Defendant created a Facebook page Tucson Parks are Wrecked, where he has posted daily, multiple times targeting specific staff and the department. From the creation to June 12, 2026 at least 210 target posts have been made. Defendants posts have not been isolated or occasional they have been persistent, repetitive, and directed at the City and individual employees.rn

4/5/2026	<p>On April 5, 2026, when the Administration building was not open to the public, two employees observed Defendant in a blue vehicle repeatedly driving back and forth and pulling into parking lots in front of Parks and Recreation Administration. Security footage showed Defendant parking, getting out of his vehicle, walking around the area, and then returning to his car. This conduct occurred outside the workplace after prior threatening and retaliatory statements.</p> <p>On April 9, 2026, Defendant was again captured on camera outside the Parks Administration building after hours. Lara Hamwey recognized Defendant as she walked to her vehicle. When she left the parking lot, Defendant put his vehicle in drive and followed her. This incident escalated staff concerns from online harassment to physical monitoring and following of employees leaving work.</p> <p>These incidents demonstrated Defendants disregard for workplace boundaries, employee safety, and appropriate distance from City personnel and City property.</p> <p>In concert with a post he made about use of city vehicles, under the comments for his post, he stated on April 27, 2026 that he had been watching employees. There is natural concern for his repeated statements publicly of plan to harass and with this post admits to watching staff.</p>
4/10/2026	<p>On April 10, 2026, City personnel discussed additional safety measures with the Tucson Police Department for upcoming public hearings on fees, specifically because of Defendants recent posts criticizing City personnel, including the HR Director and the Parks and Recreation Deputy Director.</p> <p>On April 11, 2026, due to escalating comments by Defendant, the City requested Tucson Police Department presence at promoted in-person Parks and Recreation fee town halls held at recreation centers. Officers were present at all but one event because of concern Defendant might appear and confront staff or attendees.</p> <p>On April 21, 2026, Public Information Officer Sierra Boyer raised concerns by email about the Citys ability to block Defendant and his related Facebook page from posting because monitoring comments for harassment and threats was becoming a full-time task and raised concern that others were following Defendants lead.</p> <p>Also on April 21, 2026, City personnel communicated with the City Attorneys Office and Assistant City Manager that Defendants online activity was escalating and spreading inaccurate and skewed allegations about the Department and its staff.</p> <p>On May 20, 2026, the City again requested Tucson Police Department presence at upcoming public events, including ribbon-cutting events, in part because Defendants commentary had intensified and had expanded to other public social media pages connected to City officials and events.</p>
4/27/2026	<p>On April 27, 2026, a concerned resident sent the Mayor and Council a snippet of Defendants Facebook post regarding City vehicle use. The image in that post appeared to have been taken from within a restricted work compound limited to City employees. This prompted an internal meeting involving Tucson Police Department, City attorneys, Human Resources, and Parks and Recreation leadership to address Defendants escalating conduct and options for protecting employees and the workplace.</p> <p>On May 20, 2026, the Department installed an additional CCTV camera covering the parking lot in front of the Parks Administration Office after Defendants confrontation with John Bonillas and Defendants repeated appearance near Administration facilities. The added surveillance was necessary to document any further unexpected encounters and to improve employee safety.</p> <p>City staff also made multiple attempts to report Defendants online page and conduct as harassing, but those efforts were unsuccessful, leaving the conduct ongoing and unremedied absent court intervention.</p>
5/18/2026	<p>On May 18, 2026, while attempting to pick up a mobile lunch order near the Administration building, John Bonillas was approached by Defendant in a public setting. Defendant got into Mr. Bonillas face, filmed him with a phone, and questioned him. This was an unwanted and aggressive confrontation directed at a City employee in close proximity to the workplace.</p> <p>After this incident, staff reported increased fear about being approached, recorded, or confronted by Defendant while in Parks and Recreation spaces or while carrying out City functions in public. Since then, other employees have expressed concerns for their own safety both during work hours and outside normal office hours.</p>

5. The following persons should also be on this order. They should be protected because Defendant is a danger to them:

LARA HAMWEY	Birthdate: 6/13/1978	John Bonillas	Birthdate: 2/12/1992
John Mancine	Birthdate: 8/19/1985	Corey Martinez	Birthdate: 8/11/1990
Gregory Jackson	Birthdate: 1/5/1965		

6. Defendant should be ordered to stay away from these locations at all times, even when I am not present.

NOTE: Do not list confidential addresses here.

- Residence: _____
- Work/Business: _____
- School: _____
- Other: (Confidential)
(Confidential) _____

7a. Defendant owns or carries a firearm or other weapons.

7b. Defendant should be ordered NOT to possess firearms while this order is in effect because of the risk of harm to me or other protected persons.

8. Defendant should be ordered to stay away from any animal that is owned, possessed, leased, kept or held by me, Defendant, or a minor child living in either my household or Defendant's household.

9. Other requests: Plaintiff requests that Defendant be restrained from coming near the Parks Administration office, other designated City work locations, and adjacent work areas, including Reid Park, as necessary to protect employees and others who are on City property or performing official work duties. Plaintiff further requests that Defendant be restrained from approaching, contacting, filming, following, or confronting Parks and Recreation employees while they are on City property or performing official work

Under penalty of perjury, I swear or affirm the above statements are true to the best of my knowledge. I request an order or an injunction granting relief as allowed by law.

/s/ CITY OF TUCSON PARKS AND RECREATION

Plaintiff

Attest: /s/ Brianna Lopez

Judicial Officer/Clerk/Notary

6/12/2026

Date