



July 9, 2026

Statement regarding Kathleen Tierney lawsuit

Although the City of Tempe does not litigate pending cases through the media, it is important to explain why our officers responded as they did.

Our top priority is keeping the City of Tempe safe.

Mass violence is an unfortunate reality and social media is often used to communicate threats.

Tempe Police responded to City Council Chambers on Aug. 28 after becoming aware of a social media post referencing that night's meeting and an image depicting the destruction of a city. The post was made by an account using a pseudonym shortly before what was expected to be a highly contentious Tempe City Council meeting.

Investigators responded to the post as a credible threat. As County Attorney Rachel Mitchell stated in her letter to Mayor Corey Woods, "Your responsibility is to respond very quickly to a potential threat and take all reasonable steps to make sure that people are safe."

Nearly 100 people were in Council Chambers waiting for the meeting to start. Their safety was imperative. Tempe Police evacuated City Hall, secured the area and began investigating the source of the post. Their responsibility was and remains protecting the public. The City of Tempe and our Tempe Police will continue to take action to protect the Tempe community.

The City will respond to the specific allegations in this lawsuit through the judicial process.



Maricopa County Attorney
Rachel H. Mitchell

January 29, 2026

Corey Woods
Tempe City Mayor
31 E 5th Street
Tempe, AZ 85281

Dear Mayor Woods:

I wanted to reach out to you concerning the recent case that my office reviewed involving Kathleen Tierney. I realize that you faced criticism for the steps you took in response to the possible threat.

I think it is important for people to remember that the city council, the police, and my office are applying very different standards to the same situation.

Your responsibility is to respond very quickly to a potential threat and take all reasonable steps to make sure that people are safe. The police are expected to investigate and submit a case for charges if they feel that there is probable cause to believe that a crime was committed. My office, on the other hand, considers whether there is sufficient admissible evidence to convince a unanimous jury that the accused is guilty beyond a reasonable doubt while taking into account likely defenses.

Not filing charges on my part should not be taken as a failure on your part. Nor should it signal an unwillingness on our part to look at future cases.

We are grateful that no one did experience harm and appreciate your thoughtful concern and timely actions. I look forward to collaborating with you as we serve our community.

Sincerely,

Rachel H. Mitchell

cc: Chief Ken McCoy

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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

Kathleen Tierney,
Plaintiff,

- vs -

City of Tempe, a political subdivision of
the State of Arizona,
Defendant.

Case No.:

COMPLAINT

(Hon. _____)

INTRODUCTION

1. American political debate has never been required to be polite or restrained. Since before the founding of this country, pamphlets, political cartoons, town halls, and soapbox orators have carried sharp public criticism of those in power.

2. In our modern civic life, much of that same debate now occurs on social media. The Supreme Court has recognized that today, “the most important places for the exchange of views” are “cyberspace” and “social media in particular.” *Packingham v. North Carolina*, 582 U.S. 98, 104 (2017). Facebook and similar platforms are where citizens follow local government, debate public policy, organize around civic issues, and speak directly to elected officials.

3. But while the medium has changed, the protection afforded by the Constitution has not. Online political speech remains protected even when it is irreverent, exaggerated, mocking, uncomfortable, or offensive.

4. This case arises from the Defendant City of Tempe's (the "City") treatment of protected political expression as a felony.

5. Ms. Tierney posted a *Game of Thrones* GIF in the comment section of a Tempe councilmember's public Facebook page during an ongoing debate about a city ordinance. The GIF depicted the fictional character Cersei holding a glass of wine and smirking while watching green smoke rise from a distant area in the fictional city around her.

6. The City, through Tempe Police Department (“TPD”), turned an innocuous Facebook comment into a humiliating and life-altering ordeal. It labeled her comment a “specific. . . and credible” threat to Tempe City Hall, somehow equating a digitally rendered medieval city from a fantasy television drama about dragons, knights, and dark magic with downtown Tempe.

7. TPD surveilled Ms. Tierney's Tucson home, arrested her outside it, searched her residence, and seized her digital devices. TPD then interrogated her, shackled her, transported her more than one hundred miles to Tempe, booked her into jail, and released her onto the street without her phone, wallet, or transportation home.

8. After that, TPD referred Ms. Tierney for felony prosecution. The City also publicly announced her arrest and released her mugshot to the media.

9. And, when the Maricopa County Attorney later declined to prosecute her, the City stood by its response, stating publicly that it would do the same thing to any other citizen “under similar circumstances.”

JURISDICTION AND VENUE

10. This action is brought pursuant to 42 U.S.C. § 1983 and Arizona common law.

11. This Court has subject matter jurisdiction over this action pursuant to 28 U.S.C. §§ 1331, 1343, and 1367(a).

12. A substantial part of the events giving rise to this action occurred in Pima County, Arizona. Venue is proper in this Court's Tucson Division pursuant to 28 U.S.C. § 1391(b) and LRCiv 77.1(a).

13. Plaintiff presented her claims to Defendant City of Tempe as required by Ariz. Rev. Stat. § 12-821.01 on February 25, 2026, within the time required by law.

14. Defendant City of Tempe has not made any disposition of the claims, and the claims are deemed denied because more than sixty days have passed since they were filed. Ariz. Rev. Stat. § 12-821.01(E).

15. This Complaint is being filed within the time required by law.

PARTIES

16. Plaintiff Kathleen "Kadi" Tierney is a single adult and a resident of Pima County, Arizona.

17. Defendant City of Tempe is a political subdivision of the State of Arizona capable of being sued pursuant to Ariz. Rev. Stat. §§ 12-820(7), 821.01.

18. The City operates through TPD and its officers, employees, and agents.

19. The City's Chief of Police is a final policymaker concerning the acts of TPD. According to the Office of the Chief of Police's website, "The Office of the Chief provides overall leadership, vision, and direction for the department."¹

20. The City is liable for TPD's unconstitutional acts that were (1) undertaken pursuant to an official policy, custom, or practice or (2) later ratified by the City or a final policymaker, including the Chief of Police.

FACTUAL ALLEGATIONS COMMON TO ALL COUNTS

A. Ms. Tierney's Personal Background

21. Ms. Tierney's decades-long career has been in public affairs, political consulting, communications, and community engagement.

¹ <https://www.tempe.gov/government/police/office-of-the-chief>.

1 22. Over time, she specialized in municipal and county proposition campaigns, first
2 in Pima County and later in Maricopa County.

3 23. Her work required her to closely follow public policy matters across Arizona,
4 including in cities like Tempe.

5 24. Through that work, Ms. Tierney developed professional relationships with
6 elected officials in Pima and Maricopa Counties, including members of the Tempe City
7 Council (the “City Council”).

8 25. In September 2024, while assisting with campaign efforts for a Maricopa County
9 Board of Supervisors candidate, Ms. Tierney attended a political fundraiser where she was
10 introduced to Tempe City Councilmember Randy Keating.

11 26. During a casual conversation with Councilmember Keating, Ms. Tierney learned
12 that he had a dog named Cersei, a reference to the fictional character from the hit television
13 show, *Game of Thrones*. Councilmember Keating mentioned that *Game of Thrones* was one
14 of his favorite shows, and Ms. Tierney joked that the show’s themes of palace intrigue, power,
15 loyalty, and political maneuvering had obvious parallels to the world of local politics.

16 27. The interaction was memorable because Councilmember Keating’s dog’s name
17 was unique and the conversation was lighthearted. The conversation provided the context for
18 Ms. Tierney’s later use of a Cersei GIF in a Facebook comment on Councilmember Keating’s
19 public page.

20 28. At the end of 2024, Ms. Tierney decided to step away from political fundraising
21 and campaign consulting.

22 29. She accepted a public affairs position with a large telecommunications
23 corporation and informed her professional network that she was no longer engaged in
24 campaign work.

25 30. Although she left consulting, she continued to follow municipal policy debates
26 as part of her professional interest in public affairs and local governance.
27

1 B. The City's July 2025 Parks Ordinance and Referendum Petition

2 31. In July 2025, the Tempe City Council unanimously approved a new ordinance
3 imposing restrictions on gatherings in city parks.

4 32. The ordinance drew significant public opposition from advocates and residents
5 who believed the restrictions would limit community-based outreach and charitable activities
6 in public spaces.

7 33. Ms. Tierney followed the ordinance, and the public's reaction, from proposal
8 through approval.

9 34. She believed the City Council was wrong to disregard substantial public
10 opposition.

11 35. Drawing on her professional experience in proposition campaigns and local
12 public affairs, Ms. Tierney believed the City Council's handling of the ordinance would
13 undermine public confidence in local government and breed cynicism toward future public
14 initiatives.

15 36. After the ordinance passed, community members organized a referendum
16 petition effort, which, if successful, would require the City Council to repeal the ordinance or
17 submit it to a vote of the City electorate.

18 37. However, Ms. Tierney became especially concerned by reports that individuals
19 or organizations close to the City or the City Council were funding professional canvassing
20 companies, including Groundswell Contact, to oppose the referendum campaign by
21 discouraging Tempe citizens from signing the petition.²

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23
24 ² TJ L'Heureux, *Hired Mercenaries Are Blocking Tempe Petitioners. Who's Paying Them?*,
25 Phoenix New Times (July 23, 2025), [https://www.phoenixnewtimes.com/news/tempe-peti-](https://www.phoenixnewtimes.com/news/tempe-petition-opposed-paid-opposition-mysterious-backing-22163028/)
26 [tion-opposed-paid-opposition-mysterious-backing-22163028/](https://www.phoenixnewtimes.com/news/tempe-petition-opposed-paid-opposition-mysterious-backing-22163028/); Lee Shappell, *Tempe Parks-*
27 *Permit Petition Drive Turns Lively in Closing Days*, Tempe Tribune (July 27, 2025),
[https://www.tempenews.com/news/tempe-parks-permit-petition-drive-turns-lively-in-clos-](https://www.tempenews.com/news/tempe-parks-permit-petition-drive-turns-lively-in-closing-days/article_6b443d92-dd16-420b-8655-b2a93131d136.html)
[ing-days/article_6b443d92-dd16-420b-8655-b2a93131d136.html](https://www.tempenews.com/news/tempe-parks-permit-petition-drive-turns-lively-in-closing-days/article_6b443d92-dd16-420b-8655-b2a93131d136.html).

1 38. Despite that paid-for opposition, organizers gathered thousands of signatures
2 within approximately one month, more than the number required to force the City Council to
3 reconsider the ordinance or submit it to voters.

4 39. Ms. Tierney was in Tucson and did not participate directly in the petition effort.

5 40. From Facebook, it appeared to Ms. Tierney that a person named “Konner
6 Culver” was among the most vocal people advocating that Tempe officials be held
7 accountable.

8 41. Ms. Tierney’s interest in the issue stemmed from her professional background
9 and concern for the integrity of local governance and she viewed the petition effort as a
10 praiseworthy example of grassroots civic engagement.

11 C. Ms. Tierney’s August 28, 2025 Facebook Comment

12 42. The City Council scheduled a meeting for August 28, 2025, at which it would
13 address the petition and vote on a motion to repeal the ordinance.

14 43. In the days leading up to that meeting, discussion on social media intensified.

15 44. On the evening of August 28, 2025, Ms. Tierney was at home in Tucson.

16 45. She commented on a post made by Councilmember Keating’s public Facebook
17 page. The post concerned the upcoming meeting, and Ms. Tierney made the comment from
18 an account named “Kadi Marie,” which was her nickname by which she is known and her
19 middle name.

20 46. Ms. Tierney’s comment stated, “Konner Culver watching tonight’s council
21 meeting.”

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23 ///

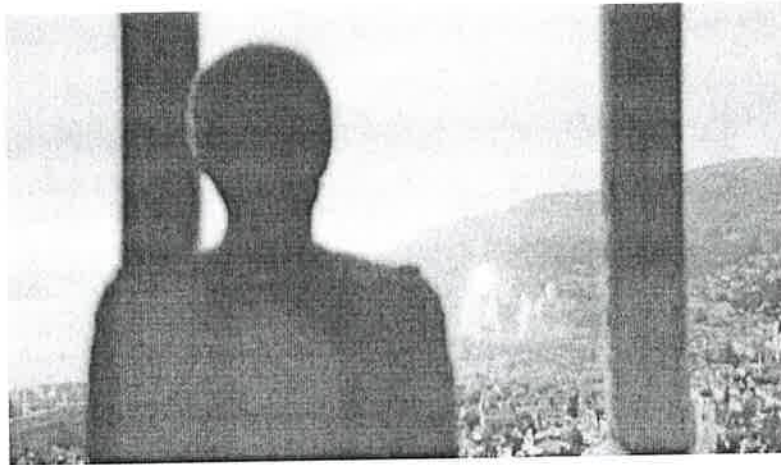
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1 47. Ms. Tierney included a GIF³ depicting a scene from *Game of Thrones*. The GIF
2 depicted the fictional character Cersei holding a glass of wine and smirking while watching
3 green smoke rise from a distant area in the fictional city around her:



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12 48. Ms. Tierney selected the Cersei GIF because of her prior conversation with
13 Councilmember Keating about the TV show and his dog's name.

14 49. Ms. Tierney intended the post to convey, in exaggerated and humorous form, the
15 public controversy surrounding the ordinance, the City Council's unpopular course of action,
16 and the satisfaction activists likely felt after the rapid mobilization of the referendum petition.
17 The comment referenced Konner Culver because he appeared to Ms. Tierney to be one of the
18 people most active on Facebook in opposition to the parks ordinance.

19 50. The post did not make any personal threats.

20 51. The post did not mention a bomb, weapon, explosive, device, plan, time, method,
21 or instruction.

22 52. The post did not encourage anyone to engage in violence or disrupt the City
23 Council meeting.

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25
26 ³ "GIF" stands for Graphics Interchange Format. It is a digital image format that is commonly
27 used to display a short, soundless looping animation. The photograph included in ¶ 47 is one
frame from the GIF that Ms. Tierney posted.

53. The post was not directed at Tempe City Hall. Rather, the GIF depicted the fictional city of “King’s Landing” from *Game of Thrones*, which was created with CGI and based on footage of Dubrovnik, a medieval walled city in Croatia:⁴



54. Ms. Tierney had no intention of threatening anyone, disrupting the meeting, or causing the meeting to be canceled.

55. After posting the comment, Ms. Tierney went about her evening in Tucson.

56. She had no contact with anyone at the meeting.

57. She did not learn that the City Council meeting had been canceled until a friend later informed her.

58. Ms. Tierney was surprised and confused by the cancellation.

⁴ rspvfx, *Rising Sun Pictures (RSP) – Game of Thrones Season 6 VFX Breakdowns*, YouTube, at 0:51 (July 25, 2016), https://youtu.be/3tPRK92TtIY?si=-vyuqJIIW_WrKs7s&t=51.

1 59. She did not believe her comment could reasonably be interpreted as anything
2 other than political commentary.

3 D. The City's Reaction to the Facebook Comment

4 60. Ms. Tierney's comment came to the attention of TPD after Councilmember
5 Keating contacted TPD about it.

6 61. In his report, TPD Officer Victor Barajas stated that the GIF depicted "a
7 silhouetted person overlooking the valley, similar to the downtown area where the Tempe City
8 council meeting was taking place, with a mushroom cloud erupting into the air, as if an
9 explosion had occurred."

10 62. His report concluded that "'Kadi Marie' committed Disorderly Conduct (ARS
11 13-2904A4) when they posted a photo on social media that depicted an explosion in the valley
12 area, similar to Tempe City Hall, located at 31 E. 5th St. in Tempe, AZ, at the same time city
13 council was congregating, leading the meeting to be cancelled."

14 63. He also noted in his report that "[o]fficers conducted a sweep of the building,
15 and at that time, no crime was established." TPD also brought in a "bomb detecting K9" to
16 sweep Tempe City Hall "and surrounding areas for potential devices, which prompted negative
17 results."

18 64. In effect, TPD equated a digitally rendered fantasy setting from a television
19 drama about dragons, knights, and dark magic, with downtown Tempe and treated the
20 fictional, green explosion emanating within that fantasy city as a credible threat to City Hall.

21 65. Based on that interpretation, the City and TPD canceled the City Council
22 meeting.

23 66. The following day, the City publicly announced that the "concern was specific
24 in nature and credible enough" that the meeting could not proceed.

25 E. TPD's Investigation of the Comment

26 67. TPD opened a criminal investigation into the Facebook comment. On August
27 29, 2025, Detective Marra Guajardo was assigned the investigation.

1 68. As part of her investigation, Detective Guajardo reviewed the Facebook
2 comment made by the “Kadi Marie” account. Detective Guajardo described the GIF as “a
3 person watching an explosion in a city. . . from a TV show ‘Game of Thrones’ where a
4 silhouetted person overlooks a valley with a densely populated city and a mushroom cloud
5 erupting into the air as if an explosion had occurred.”

6 69. Detective Guajardo next took steps to identify the person behind the “Kadi
7 Marie” Facebook account and to investigate the “Konner Culver” account referenced in the
8 post. She obtained multiple warrants relating to those accounts, including social media
9 account information, subscriber information, IP address information, and related electronic
10 records.

11 70. According to Detective Guajardo’s report, the search warrant affidavit is “sealed
12 outside the public record by the courts.” Upon information and belief, the search warrant
13 affidavit was based on the same facts set forth in TPD’s reports, specifically Plaintiff’s
14 Facebook comment and the accompanying *Game of Thrones* GIF.

15 71. Through that process, Detective Guajardo identified Ms. Tierney as the person
16 associated with the “Kadi Marie” account and identified the person associated with the
17 “Konner Culver” account. Detective Guajardo also identified Ms. Tierney’s phone number,
18 email address, employment, professional background, internet service provider, and her
19 Tucson address.

20 72. The investigation confirmed that Ms. Tierney had posted the Facebook
21 comment. But it did not uncover evidence that she had any weapon, explosive, plan,
22 accomplice, intent to travel to Tempe, communication with anyone at the meeting, or intent to
23 threaten or harm anyone.

24 F. The City’s Surveillance and Arrest of Ms. Tierney

25 73. The City first surveilled Ms. Tierney on September 18, 2025. TPD Sergeant J.
26 Lomeli and Detective Matthew Moerland drove to Tucson and “observed [Ms. Tierney]
27

1 exiting her residence with her dogs and between 0700 – 0800 hours she was observed leaving
2 the area in a company vehicle[.]”

3 74. On September 23, 2025, Detective Guajardo obtained a search warrant for Ms.
4 Tierney’s Tucson residence and her company’s vehicle.

5 75. According to Detective Guajardo’s report, the search warrant affidavit is “sealed
6 outside the public record by the courts.” Upon information and belief, the search warrant
7 affidavit was based on the same facts set forth in TPD’s reports, specifically Plaintiff’s
8 Facebook comment and the accompanying *Game of Thrones* GIF.

9 76. The next morning, Detective Guajardo requested assistance from Officer
10 Matthew Hood of TPD’s Criminal Apprehension and Surveillance Team to execute the search
11 warrant and arrest Ms. Tierney. Officer Hood was also assigned to the United States Marshals
12 Service AZ WANTED Violent Offender Task Force.

13 77. Detective Guajardo advised Officer Hood that probable cause existed to arrest
14 Ms. Tierney for felony computer tampering (Ariz. Rev. Stat. § 13-2316(A)(5)), misdemeanor
15 disorderly conduct (Ariz. Rev. Stat. § 13-2904(A)(4)), and misdemeanor threatening or
16 intimidating (Ariz. Rev. Stat. § 13-1202(A)(2)).

17 78. At approximately 5:00 a.m. on September 24, 2025, Detective Guajardo, along
18 with Officer Hood, members of the United States Marshals Service AZ WANTED Violent
19 Offender Task Force, and other TPD officers, employees, and agents began surveillance of
20 Ms. Tierney’s home in Tucson.

21 79. They observed Ms. Tierney leave her residence with her dogs at approximately
22 6:30 a.m.

23 80. At approximately 7:50 a.m., TPD’s officers, employees, and agents contacted
24 Ms. Tierney outside her residence as she was unloading items from her vehicle.

25 81. Detective Guajardo handcuffed Ms. Tierney and placed her under arrest.

26 82. TPD’s officers, employees, and agents, including Sergeant J. Lomeli, Detective
27 Moerland, Detective E. Garcia, Detective Matthew DeCourval, and Forensic Services

1 Technician Gregory Roorda then entered Ms. Tierney's residence and executed the search
2 warrant. Her cellphone, laptops, and other electronic evidence was seized from the home.

3 83. After arresting Ms. Tierney, Detective Guajardo and Officer Hood transported
4 her to the Tucson Police Department's headquarters.

5 84. While being interviewed, Ms. Tierney explained that she used the *Game of*
6 *Thrones* GIF because Councilmember Keating had a dog named Cersei.

7 85. Ms. Tierney explained that the comment was intended as a joke about Konner
8 Culver watching the Tempe City Council meeting.

9 86. Ms. Tierney denied intending to threaten anyone, or to disrupt the City Council
10 meeting.

11 87. TPD's questioning focused heavily on Konner Culver. Ms. Tierney was
12 repeatedly asked whether she knew him or had communicated with him.

13 88. Ms. Tierney told officers that she had never met Konner Culver, had never
14 communicated with him directly, and did not know who he was beyond seeing his public
15 Facebook posts.

16 89. The focus of the questioning suggested to Ms. Tierney that TPD's real
17 motivation for investigating her was to identify and gather information about Konner Culver.

18 90. After the interview, Detective Guajardo and Officer Hood placed Ms. Tierney
19 in wrist and ankle shackles and then transported her from Tucson to Tempe.

20 91. Ms. Tierney was booked into the Tempe City Jail. During booking, Ms. Tierney
21 was searched, fingerprinted, and photographed.

22 92. After booking, Ms. Tierney was released pending prosecution. She was released
23 in Tempe without her cellphone, without her wallet, and without transportation back to
24 Tucson.

25 93. Ms. Tierney walked out of the building carrying a clear plastic bag containing
26 only the jewelry she had worn that morning.
27

94. When Ms. Tierney asked where she was, a security guard pointed toward the street and said, "Mill Avenue is that way."

95. The irony was not lost on Ms. Tierney that she was released within walking distance of Tempe City Hall, the same building the City claimed was the target of her purported threat.

G. The City Publicly Brands Ms. Tierney as a Threat

96. Within approximately an hour of Ms. Tierney's release, the City publicly named Ms. Tierney in a prepared press release. The City shared the press release on its official governmental Facebook page:

City of Tempe Government's Post



City of Tempe Government
September 24, 2025

This morning, Tempe police arrested a Tucson woman whose social media post threatened the safety of an August Tempe City Council meeting, prompting police to cancel the session and evacuate all attendees.

She faces one count of Class 1 disorderly conduct, one count of threatening and intimidating, and one count of computer tampering, a Class 5 felony. Under the statute, computer tampering involves "recklessly using a computer, computer system or network to engage in a scheme or course of conduct that is directed at another person and that seriously alarms, torments, threatens or terrorizes the person."

"This arrest demonstrates our unwavering commitment to protecting the safety of our community members and elected leaders. Threats like this not only endanger lives, they disrupt civic engagement and silence the voices of the people we serve. We will not allow intimidation to interfere with democracy in our city," said Tempe Police Chief Ken McCoy.

The investigation is still active. (Post updated with new information.)



Tempe Police make arrest for online threat that forced evacuation of Council meeting

Sept. 24, 2025

TEMPE, AZ (The Arizona Republic) — Tempe police arrested a Tucson woman whose social media post threatened the safety of an August Tempe City Council meeting, prompting police to cancel the session and evacuate all attendees.

The woman, who was not identified, faces one count of Class 1 disorderly conduct, one count of threatening and intimidating, and one count of computer tampering, a Class 5 felony.

Under the statute, computer tampering involves "recklessly using a computer, computer system or network to engage in a scheme or course of conduct that is directed at another person and that seriously alarms, torments, threatens or terrorizes the person."

97. The press release included a statement from TPD Chief Ken McCoy ratifying the TPD's actions.

98. The City also distributed Ms. Tierney's mugshot to media outlets, which widely reported and circulated the City's statement and the mugshot.

///

1 H. TPD Refers Criminal Charges and the County Attorney Declines

2 99. TPD subsequently recommended that the Maricopa County Attorney file
3 multiple criminal charges against Ms. Tierney, including one count of Computer Tampering,
4 a Class 5 felony, one count of Class 1 Disorderly Conduct, and one count of Threatening or
5 Intimidating causing serious public inconvenience.

6 100. For weeks, Ms. Tierney remained under the threat of felony prosecution.

7 101. During this time, TPD Chief McCoy continued to publicly defend TPD's
8 response and to characterize Plaintiff's Facebook post as a threat. TPD Chief McCoy stated
9 publicly that "[w]henever we see threats, we take them seriously," because "acts of violence
10 are carried out, whether they're mass shootings or bombings," and that TPD's "team made the
11 right decision based on the information they had."⁵

12 102. Ultimately, the Maricopa County Attorney declined to pursue the charges due to
13 "no reasonable likelihood of conviction."

14 103. Rather than acknowledge error, the City publicly doubled down. It issued
15 another public statement on December 11, 2025, acknowledging the County Attorney's
16 decision but stating that the City "disagree[d] with the County Attorney's decision."

17 104. Although the City announced that it would not pursue the misdemeanor charges,
18 it maintained that the investigation and arrest of Ms. Tierney remained "the right call." The
19 City also characterized the Facebook comment as an "anonymous online post that looked like
20 a direct threat," and asserted that its investigators "followed the facts where they led: to the
21 door of the individual who created and posted the image that caused the Council meeting to
22 be evacuated."

23 105. The City further suggested that the matter "might have concluded differently"
24 had Ms. Tierney "come forward."

25
26 ⁵ Lee Shappell, *Tempe City Council 'Threat' May Have Been Bad Joke*, Tempe News (Nov.
27 23, 2025), https://www.tempenews.com/news/tempe-city-council-threat-may-have-been-bad-joke/article_05535821-7c88-4a81-90df-590de3555521.html.

1 106. The City ratified TPD's actions: "Our team acted appropriately based on the
2 information available at the time."

3 107. The City ended its statement with: "Tempe will continue to take every threat
4 seriously, safeguard our public spaces and meetings, and uphold the expectations our residents
5 have for a secure and well-governed city."

6 108. After the Maricopa County Attorney declined charges, Chief McCoy and the
7 City continued to defend TPD's response and the City's characterization of Plaintiff's post as
8 a threat. He stated that "at the end of the day, it was Kathleen Tierney that made a threat
9 through social media[.]" He further stated that TPD handled the incident responsibly, and that
10 "the lesson might [be] to be careful with social-media posts, especially in connection with
11 issues like the Tempe parks ordinance revisions[.]"⁶

12 109. On February 27, 2026, the City released a third press release addressing Ms.
13 Tierney's notice of claim. In that statement, the City stated that "[a]s with any investigation,
14 the Tempe Police Department followed established procedures. Ms. Tierney was treated no
15 differently than any other member of the community under similar circumstances."

16 I. Ms. Tierney's Personal and Professional Fallout

17 110. Ms. Tierney suffered substantial economic, reputational, and emotional injuries
18 as a direct result of the City's actions.

19 111. For more than twenty-five years, Ms. Tierney built her career in public affairs.
20 Her livelihood depended on professional credibility, public trust, and relationships with
21 elected officials and community stakeholders.

22 112. Being publicly branded as someone arrested for threatening a City Council
23 meeting was uniquely damaging to Ms. Tierney's career and reputation.

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25
26 ⁶ Lee Shappell, *Maricopa County Attorney Declines Charges in Tempe Council Threat*, Tempe
27 News (Dec. 10, 2025), https://www.tempenews.com/news/maricopa-county-attorney-declines-charges-in-tempe-council-threat/article_d70f86b5-95b6-4058-bc2e-41ac888c6f5e.html.

113. Within days of her arrest and the distribution of the City's press release and her mugshot, Ms. Tierney's employer fired her. At the time, she was earning approximately \$150,000 per year with full benefits.

114. In a single day, the City's public accusations destroyed decades of professional goodwill. Ms. Tierney has been rendered effectively unemployable in the field in which she spent her adult life.

115. Ms. Tierney's arrest and public branding caused a protracted interruption of her gainful employment in public affairs and civic engagement. She has not obtained full-time employment commensurate with the position, compensation, responsibilities, or professional standing she had before the City's actions.

116. Ms. Tierney also suffered substantial emotional distress, anxiety, humiliation, and fear. Her arrest, interrogation, and cross-county transport in shackles was unimaginably harrowing for someone who had never before been arrested.

117. For weeks after her arrest, Ms. Tierney lived under the threat of felony prosecution. During that time, she suffered sleeplessness, loss of appetite, persistent anxiety about her future, difficulty concentrating, and paralyzing embarrassment.

118. The public nature of the arrest intensified the harm. Friends, colleagues, professional contacts, and members of the civic community saw Ms. Tierney's name and mugshot associated with allegations of a "credible," "specific," and "dangerous" "threat" against a City Council meeting.

119. Ms. Tierney has limited her participation in online political discussion because she fears government officials may again punish her for protected speech.

COUNT 1

(First Amendment Retaliation, 42 U.S.C. § 1983)
Defendant City of Tempe

120. Plaintiff realleges and incorporates all preceding paragraphs as though fully set forth herein.

1 121. Plaintiff's federal claims are brought under 42 U.S.C. § 1983 against Defendant
2 City of Tempe. For each federal claim, Plaintiff alleges both (1) the violation of a particular
3 constitutional right, and (2) municipal liability under *Monell v. N.Y.C. Dep't of Soc. Svcs.*, 436
4 U.S. 658 (1978) because the violation was caused by City policy, custom, or practice, and was
5 later ratified by a final policymaker, including the Chief of Police. The City's *Monell* liability
6 is pled fully in Count 5.

7 122. Under the First Amendment, a citizen has the right to free expression, including
8 on social media. See *Packingham v. North Carolina*, 582 U.S. 98, 108 (2017).

9 123. Plaintiff engaged in constitutionally protected speech when she posted the
10 comment and *Game of Thrones* GIF on a City councilmember's public Facebook page during
11 an ongoing public debate about a City ordinance and referendum petition.

12 124. Plaintiff's post was political commentary about matters of public concern,
13 including the park ordinance, the City Council's passage of that ordinance, the referendum
14 effort that followed, and civic engagement in response to local government action.

15 125. She had no reason to believe that any person might interpret her post as a threat
16 to anyone or any place, and she did not "consciously disregard[] a substantial risk" that her
17 communications would be viewed as threatening violence. *Counterman v. Colorado*, 600 U.S.
18 66, 69 (2023).

19 126. Because her comment and GIF were, at most, "rhetorical hyperbole" or "political
20 hyperbole" protected by the First Amendment, and because it could not reasonably be
21 understood as a "true threat," the comment and GIF did not supply probable cause for any
22 arrest, search, seizure, or criminal charges.

23 127. The actions of TPD's officers, employees, and agents, taken against Plaintiff
24 would chill a person of ordinary firmness from continuing to engage in protected activity.

25 128. Those actions include opening a criminal investigation, obtaining warrants,
26 surveilling Plaintiff's home, arresting her, interrogating her, searching her residence, seizing
27 her digital devices, transporting her over one hundred miles away from her home to Tempe,

1 booking her into jail, publicly releasing her mugshot, publicly labeling her as someone who
 2 makes criminal threats against public spaces and officials, and referring her for felony
 3 prosecution.

4 129. Plaintiff's Facebook comment was a substantial or motivating factor in the
 5 actions of TPD's officers, employees, and agents.

6 COUNT 2

7 **(Fourth Amendment Unreasonable Search of Person, Residence, and Vehicle, 42 U.S.C. 8 § 1983)** 9 **Defendant City of Tempe**

10 130. Plaintiff realleges and incorporates all preceding paragraphs as though fully set
 11 forth herein.

12 131. Plaintiff's federal claims are brought under 42 U.S.C. § 1983 against Defendant
 13 City of Tempe. For each federal claim, Plaintiff alleges both (1) the violation of a particular
 14 constitutional right, and (2) municipal liability under *Monell v. N.Y.C. Dep't of Soc. Svcs.*, 436
 15 U.S. 658 (1978) because the violation was caused by City policy, custom, or practice, and was
 16 later ratified by a final policymaker, including the Chief of Police. The City's *Monell* liability
 17 is pled fully in Count 5.

18 132. Under the Fourth Amendment, a person has the right to be free from an
 19 unreasonable search of her person, residence, and vehicle. The first question in determining
 20 the reasonableness of a search is "whether the . . . action was justified at its inception[.]" *C.B.*
 21 *v. City of Sonora*, 769 F.3d 1005, 1023 (9th Cir. 2014) (quoting *New Jersey v. T.L.O.*, 469 U.S.
 22 325, 341–42 (1985)). Probable cause for a search warrant only exists "where the known facts
 23 and circumstances are sufficient to warrant a man of reasonable prudence in the belief that. . .
 24 evidence of a crime will be found." *Ornelas v. United States*, 517 U.S. 690, 696 (1996).

25 133. The City, through the officers, employees, and agents of TPD, intentionally
 26 searched Plaintiff's person, residence, and vehicle.

27 134. The searches were unjustified, and therefore unreasonable, from their inception.

135. According to Detective Guajardo's report, the search warrant affidavit is "sealed outside the public record by the courts." Upon information and belief, the search warrant affidavit was based on the same facts set forth in TPD's reports, specifically Plaintiff's Facebook comment and the accompanying *Game of Thrones* GIF.

136. Because her comment and GIF were, at most, "rhetorical hyperbole" or "political hyperbole" protected by the First Amendment, and because it could not reasonably be understood as a "true threat," the comment and GIF did not supply probable cause for any search of Plaintiff's person, residence, or vehicle.

137. Because there was no probable cause to search Plaintiff's person, residence, or vehicle, the searches were unreasonable.

COUNT 3

(Fourth Amendment Unreasonable Seizure of Person and Property, 42 U.S.C. § 1983) Defendant City of Tempe

138. Plaintiff realleges and incorporates all preceding paragraphs as though fully set forth herein.

139. Plaintiff's federal claims are brought under 42 U.S.C. § 1983 against Defendant City of Tempe. For each federal claim, Plaintiff alleges both (1) the violation of a particular constitutional right, and (2) municipal liability under *Monell v. N.Y.C. Dep't of Soc. Svcs.*, 436 U.S. 658 (1978) because the violation was caused by City policy, custom, or practice, and was later ratified by a final policymaker, including the Chief of Police. The City's *Monell* liability is pled fully in Count 5.

140. Under the Fourth Amendment, a person has the right to be free from an unreasonable seizure of her person and property.

141. The City, through the officers, employees, and agents of TPD, intentionally seized Plaintiff's person and property.

142. The seizures were unjustified, and therefore unreasonable, from their inception.

143. According to Detective Guajardo's report, the search warrant affidavit is "sealed outside the public record by the courts." Upon information and belief, the search warrant affidavit was based on the same facts set forth in TPD's reports, specifically Plaintiff's Facebook comment and the accompanying *Game of Thrones* GIF.

144. Because her comment and GIF were, at most, "rhetorical hyperbole" or "political hyperbole" protected by the First Amendment, and because it could not reasonably be understood as a "true threat," the comment and GIF did not supply probable cause for any seizure of Plaintiff's person or property.

145. Because there was no probable cause to seize Plaintiff's person or property, the seizures were unreasonable.

COUNT 4

(Fourteenth Amendment Due Process Stigma-Plus, 42 U.S.C. § 1983) Defendant City of Tempe

146. Plaintiff realleges and incorporates all preceding paragraphs as though fully set forth herein.

147. Plaintiff's federal claims are brought under 42 U.S.C. § 1983 against Defendant City of Tempe. For each federal claim, Plaintiff alleges both (1) the violation of a particular constitutional right, and (2) municipal liability under *Monell v. N.Y.C. Dep't of Soc. Svcs.*, 436 U.S. 658 (1978) because the violation was caused by City policy, custom, or practice, and was later ratified by a final policymaker, including the Chief of Police. The City's *Monell* liability is pled fully in Count 5.

148. Under the Fourteenth Amendment, "a state may not deprive a person of his liberty interest 'to engage in any of the common occupations of life' without due process of the law." *Campanelli v. Bockrath*, 100 F.3d 1476, 1478 (9th Cir. 1996) (quoting *Board of Regents v. Roth*, 408 U.S. 564, 572-73 (1972)).

149. To prove a Fourteenth Amendment Due Process "Stigma-Plus" claim, "plaintiffs must establish: (1) the public disclosure of a stigmatizing statement by a state actor; (2) the

1 accuracy of which is contested; (3) plus the denial of some more tangible interest.” *Chaudhry*
2 *v. Aragón*, 68 F.4th 1161, 1171 (9th Cir. 2023).

3 150. The City publicly disclosed stigmatizing statements about Plaintiff on
4 September 24, 2025, when it announced her arrest, released her mugshot, and posted a press
5 release on its Facebook page. In that statement, the City asserted that Plaintiff’s “social media
6 post threatened the safety of an August Tempe City Council meeting,” and quoted TPD Chief
7 McCoy as stating that “[t]hreats like this not only endanger lives, they disrupt civic
8 engagement and silence the voices of the people we serve,” and that TPD would “not allow
9 intimidation to interfere with democracy in our city.”

10 151. Between September 24, 2025, and early December 2025, TPD Chief McCoy
11 continued to publicly defend TPD’s response and to stigmatize Plaintiff by characterizing
12 Plaintiff’s Facebook comment as a threat. In a November 23, 2025 interview, TPD Chief
13 McCoy stated that “at the end of the day, it was Kathleen Tierney that made a threat through
14 social media that was taken very seriously by the recipients of it and by law enforcement.” He
15 further stated that TPD “handled the incident responsibly[.]”. In a separate public statement,
16 TPD Chief McCoy again defended TPD’s response, stating that “[w]hen we see threats,
17 we take them seriously,” because “acts of violence are carried out, whether they’re mass
18 shootings or bombings,” and that TPD’s “team made the right decision based on the
19 information they had.”

20 152. The City again disclosed stigmatizing statements about Plaintiff in a press
21 release dated December 11, 2025, after the Maricopa County Attorney declined to prosecute
22 Plaintiff. The City stated that it “disagree[d] with the County Attorney’s decision,” continued
23 to describe Plaintiff’s Facebook comment as an “anonymous online post that looked like a
24 direct threat,” and claimed that TPD “followed the facts where they led: to the door of the
25 individual who created and posted the image that caused the Council meeting to be evacuated.”
26 The City further stated that its “team acted appropriately” and that Tempe would “continue to
27

1 take every threat seriously,” thereby continuing to publicly associate Plaintiff with a supposed
2 threat to public safety even after prosecutors declined to bring charges.

3 153. The City’s next stigmatizing statements about Plaintiff were publicly disclosed
4 in another press release on February 27, 2026, in response to her notice of claim. In that
5 statement, the City asserted that the cancellation of the August 28 City Council meeting and
6 the investigation of Plaintiff were “made in response to information that was assessed as a
7 credible public safety concern.” The City further stated that its search warrants were approved
8 by judges, that TPD “followed established procedures,” that Plaintiff “was treated no
9 differently than any other member of the community under similar circumstances,” and that
10 “[t]he safety of residents, city employees, and elected officials remains the City’s highest
11 priority.”

12 154. The gist and sting of the February 27, 2026 statement was that Plaintiff’s
13 Facebook post created a credible danger to residents, City employees, and elected officials,
14 and that the City would respond the same way to any other citizen who engaged in similar
15 speech.

16 155. Plaintiff contests the accuracy of each of the City’s stigmatizing statements.
17 Plaintiff’s Facebook comment and GIF were, at most, protected “rhetorical hyperbole” or
18 “political hyperbole” and could not reasonably be understood as a “true threat.” Plaintiff did
19 not threaten anyone, endanger lives, interfere with democracy, create a credible public-safety
20 danger, or place residents, City employees, or elected officials in danger.

21 156. The City’s stigmatizing statements resulted in the denial of her tangible interest
22 in engaging in her occupation. Plaintiff lost her \$150,000-per-year public affairs position
23 within days of the City’s press release detailing her arrest. The City’s statements seriously
24 damaged Plaintiff’s professional reputation in public affairs, fundraising, and political
25 campaigning, a field that depends on credibility, public trust, and goodwill.
26
27

1 157. Since her termination, Plaintiff has experienced a protracted interruption of
 2 gainful employment and has been unable to obtain comparable full-time employment in her
 3 profession.

4 **COUNT 5**

5 **(Monell Liability – Policy, Custom, or Practice and Final Policymaker Ratification, 42**
 6 **U.S.C. § 1983)**
 7 **Defendant City of Tempe**

8 158. Plaintiff realleges and incorporates all preceding paragraphs as though fully set
 9 forth herein.

10 159. Under *Monell v. N.Y.C. Dep't of Soc. Svcs.*, 436 U.S. 658, 690–91 (1978),
 11 Defendant City of Tempe is liable for the actions of TPD's officers, employees, and agents
 12 taken pursuant to a "policy statement, ordinance, regulation, or decision officially adopted and
 13 promulgated by that body's officers," or where the action is made "pursuant to governmental
 14 'custom' even though such a custom has not received formal approval through the body's
 15 official decision-making channels."

16 160. The City, including TPD's officers, employees, and agents, acted under the color
 17 of state law when they opened a criminal investigation into Plaintiff, obtained warrants,
 18 surveilled Plaintiff's home, arrested her, interrogated her, searched her residence, seized her
 19 digital devices, transported her over one hundred miles away from her home to Tempe, booked
 20 her into jail, publicly released her mugshot, publicly labeled her as someone who makes
 21 criminal threats against public spaces and officials, and referred her for felony prosecution.

22 161. The acts of the City, including TPD's officers, employees, and agents, deprived
 23 Plaintiff of her First, Fourth, and Fourteenth Amendment rights.

24 162. The City, including TPD's officers, employees, and agents, acted pursuant to an
 25 expressly adopted official policy or a widespread or longstanding practice or custom of the
 26 City.
 27

1 163. The City’s official policy or widespread or longstanding practice or custom
2 caused the deprivation of Plaintiff’s First, Fourth, and Fourteenth Amendment rights by the
3 City, including TPD’s officers, employees, and agents.

4 164. The City’s own public statements confirm that its treatment of Plaintiff was
5 consistent with how the City and TPD handle political speech like Plaintiff’s Facebook
6 comment and GIF.

7 165. After the Maricopa County Attorney declined to prosecute Plaintiff, the City
8 stated in its December 11, 2025 statement that it “disagree[d] with the County Attorney’s
9 decision,” that treating Plaintiff’s Facebook comment as a threat remained “the right call,” and
10 that TPD investigators “followed the facts where they led.”

11 166. The City’s February 27, 2026 statement further confirmed that TPD’s conduct
12 was consistent with City policy, procedure, and custom. In that statement, the City asserted
13 that TPD “followed established procedures” and that Plaintiff “was treated no differently than
14 any other member of the community under similar circumstances.”

15 167. Additionally, a municipality can be liable for an isolated constitutional violation
16 if a final policymaker “ratified” a subordinate’s actions. *Christie v. Iopa*, 176 F.3d 1231, 1238
17 (9th Cir. 1999); see *City of St. Louis v. Praprotnik*, 485 U.S. 112, 127 (1988).

18 168. TPD Chief McCoy is a final policymaker for the City concerning TPD’s law
19 enforcement operations and TPD’s public communications. The Chief of Police “leads the
20 men and women of the Tempe Police Department,” and “provides overall leadership, vision,
21 and direction for the department.”

22 169. TPD Chief McCoy knew of and specifically made a deliberate choice to publicly
23 approve the actions of TPD’s officers, employees, and agents, and the basis for those actions.

24 170. The City’s September 24, 2025 press release quotes TPD Chief McCoy in which
25 he ratified the actions of TPD’s officers, employees, and agents, saying, “This arrest
26 demonstrates [TPD’s] unwavering commitment to protecting the safety of our community
27 members and elected leaders.”

171. In public interviews, TPD Chief McCoy stated that TPD handled the incident responsibly, and that TPD's "team made the right decision based on the information they had."

COUNT 6

**(Common Law Defamation)
Defendant City of Tempe**

172. Plaintiff realleges and incorporates all preceding paragraphs as though fully set forth herein.

173. The City made and published defamatory statements of fact about Plaintiff on September 24, 2025, when it announced her arrest and posted a press release on its Facebook page. In that statement, the City asserted that Plaintiff's "social media post threatened the safety of an August Tempe City Council meeting," and quoted TPD Chief McCoy as stating that "[t]hreats like this not only endanger lives, they disrupt civic engagement and silence the voices of the people we serve," and that TPD would "not allow intimidation to interfere with democracy in our city."

174. Between September 24, 2025, and early December 2025, the City, through TPD Chief McCoy, continued to defame Plaintiff by characterizing Plaintiff's Facebook comment as a threat. In a November 23, 2025 interview, TPD Chief McCoy stated that "at the end of the day, it was Kathleen Tierney that made a threat through social media," and that "[w]hen we see threats, we take them seriously," because "acts of violence are carried out, whether they're mass shootings or bombings," and that TPD's "team made the right decision based on the information they had."

175. The City again published defamatory statements about Plaintiff in a press release dated December 11, 2025, after the Maricopa County Attorney declined to prosecute Plaintiff. The City continued to describe Plaintiff's Facebook comment as an "anonymous online post that looked like a direct threat." The City further stated that it would "continue to take every threat seriously," thereby continuing to publicly associate Plaintiff with a supposed threat to public safety even after prosecutors declined to bring charges.

176. The City's next defamatory statements about Plaintiff were published in another press release on February 27, 2026, in response to her Notice of Claim. The gist and sting of the February 27, 2026 statement was that Plaintiff's Facebook post created a credible danger to residents, City employees, and elected officials, and that the City would respond the same way to any other citizen who engaged in similar speech.

177. The City's statements that Ms. Tierney made a threat against anyone or any place were false. At the time the City made, said, or wrote these statements, it knew that the statements were false or acted in reckless disregard of whether the statements were true or false because her comment and GIF were, at most, "rhetorical hyperbole" or "political hyperbole" protected by the First Amendment, and because it could not reasonably be understood as a "true threat."

178. The City's statements caused Plaintiff to be damaged.

COUNT 7

(Common Law False Arrest / Imprisonment) Defendant City of Tempe

179. Plaintiff realleges and incorporates all preceding paragraphs as though fully set forth herein.

180. The City, through TPD's officers, employees, and agents, acted intentionally to restrain Plaintiff to an area within their control.

181. The City, through TPD's officers, employees, and agents, acted without lawful authority and without Plaintiff's consent, namely, without probable cause or other justification because her comment and GIF were, at most, "rhetorical hyperbole" or "political hyperbole" protected by the First Amendment, and because it could not reasonably be understood as a "true threat."

182. The City's acts resulted in the direct restraint of Plaintiff's liberty or freedom of movement, either by actual force or from Plaintiff's fear of force.

183. Plaintiff was aware of and was harmed by the restraint.

COUNT 8**(Common Law Abuse of Process)
Defendant City of Tempe**

1
2
3 184. Plaintiff realleges and incorporates all preceding paragraphs as though fully set
4 forth herein.

5 185. The City, through TPD's officers, employees, and agents, willfully used against
6 Plaintiff judicially sanctioned search warrants authorizing TPD to search Plaintiff's residence
7 and vehicle and to seize or obtain Plaintiff's cellphone, laptops, electronic devices, router
8 information, electronic records, and digital data.

9 186. The City, through TPD's officers, employees, and agents, used that process in a
10 wrongful manner that was not proper in the regular course of the proceedings, namely, without
11 probable cause or other justification because her comment and GIF were, at most, "rhetorical
12 hyperbole" or "political hyperbole" protected by the First Amendment, and because it could
13 not reasonably be understood as a "true threat."

14 187. The City used that process primarily for an improper purpose or ulterior motive,
15 namely, to harass and punish Plaintiff for speaking out against the City Council, as evidenced
16 by TPD Chief McCoy's public statement that "[t]he lesson might have been to be careful with
17 social-media posts, especially in connection with issues like the Tempe park ordinance
18 revisions."

19 188. That improper purpose or ulterior motive is further evidenced by the City's
20 December 11, 2025 statement that "[h]ad [Plaintiff], who consulted on multiple occasions with
21 Tempe's former City Manager, come forward, this incident might have concluded differently."

22 189. The City's wrongful use of numerous search warrants caused Plaintiff injury,
23 damage, loss, and harm.

REQUESTED RELIEF

24
25 Plaintiff requests judgment against Defendants in an amount that will reasonably
26 compensate Plaintiff, plus costs incurred in this action, attorneys' fees pursuant to 42 U.S.C.
27 § 1988, and for such further relief as the Court deems proper.

JURY DEMAND

Pursuant to Fed. R. Civ. P. 38, Plaintiff requests a jury trial on all claims so triable.

Respectfully submitted this 8th day of July 2026.

MILLER, PITT, FELDMAN & MCANALLY, P.C.

By: /s/ Peter Timoleon Limperis

Peter Timoleon Limperis

Max W. Larnerd

Attorneys for Plaintiff

Civil Cover Sheet

This automated JS-44 conforms generally to the manual JS-44 approved by the Judicial Conference of the United States in September 1974. The data is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. The information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is authorized for use only in the District of Arizona.

The completed cover sheet must be printed directly to PDF and filed as an attachment to the Complaint or Notice of Removal.

Plaintiff(s): Kathleen Tierney , ;

County of Residence: Pima

County Where Claim For Relief Arose: Pima

Plaintiff's Atty(s):

Peter Limperis ,
Miller, Pitt, Feldman & McAnally P.C.
One S. Church Ave., Suite 1000
Tucson, Arizona 85701
520-792-3836

Max W. Larnerd ,
Miller, Pitt, Feldman & McAnally P.C.
One S. Church Ave., Suite 1000
Tucson, Arizona 85701
520-792-3836

Defendant(s): City of Tempe a Political Subdivision of the State of Arizona , ;

County of Residence: Pima

Defendant's Atty(s):

,

,

IFP REQUESTED

REMOVAL FROM COUNTY, CASE #

II. Basis of Jurisdiction:

3. Federal Question (U.S. not a party)

III. Citizenship of Principal Parties(Diversity Cases Only)

N/A

Plaintiff:-

N/A

Defendant:-

IV. Origin :

1. Original Proceeding

V. Nature of Suit:

440 Other Civil Rights

VI.Cause of Action:

42 U.S.C. Section 1983

VII. Requested in Complaint

No

Class Action:

Dollar Demand:

Yes

Jury Demand:

VIII. This case is not related to another case.

Signature: Peter Timoleon Limperis

Date: 7/8/2026

If any of this information is incorrect, please go back to the Civil Cover Sheet Input form using the *Back* button in your browser and change it. Once correct, save this form as a PDF and include it as an attachment to your case filing documents.

Revised: 01/2014