

IN THE CIRCUIT COURT OF THE
ELEVENTH JUDICIAL CIRCUIT IN
AND FOR MIAMI-DADE COUNTY, FLORIDA

2022 APR 15 PM 12:53
CLERK OF COURT

PAULE VILLARD
Petitioner,

V.

STEPHANIE KIENZLE
Respondent,

) DOMESTIC VIOLENCE DIVISION
) FAMILY DIVISION
)

) Case No.: 2022-004893-FC-04
)

) **PETITION FOR INJUNCTION
) FOR PROTECTION AGAINST
) STALKING VIOLENCE**
)

BEFORE ME, the undersigned authority, personally appeared the Petitioner **PAULE VILLARD**, who has been sworn and who states:

1. Petitioner resides at: **<Confidential>**
2. Respondent resides at: **7535 SW 26 CT
DAVIE, FL 33314**
3. **Filing fees:** Pursuant to section 784.04-6(3)(b) Florida Statutes, no filing fees may be assessed.
4. The name and address of Respondent's last known place of employment or school is:

5. Petitioner is employed or attends school at:
**NORTH MIAMI BEACH 17011 NE 19 AVE
COMMISSIONER NORTH MIAMI BEACH, FL 33162**

(DO NOT ENTER IF PLACE OF EMPLOYMENT OR SCHOOL TO BE KEPT CONFIDENTIAL, FOR SAFETY.)

6. Physical description of Respondent:

| | | | |
|---------------|--------------------|-----------|-----------------|
| Date of birth | 05/01/1957 | Age | 64 |
| Race | White | Sex | Female |
| Height | 5 Ft. 2 in. | Weight | 107 Lbs. |
| Hair Color | Black | Eye Color | Brown |

Distinguishing marks or scars: _____

Aliases (other names) Respondent uses or has used: _____

Nickname(s): _____

7. Respondent's vehicle year, make, model, color and TAG:

Is Respondent in jail? **No**

8.

Date of Arrest: _____

Jail #: _____

Cell #: _____

9. Respondent's attorney's name, address, and telephone number:

10. The following describes any other court cases, including family, civil, criminal, dependency or delinquency (juvenile), where the Petitioner and Respondent are involved (include case numbers):

11. Has the Petitioner ever gotten or tried to get an Injunction for Protection against the Respondent in this or any other court? Yes No

If YES, list case number(s) and what happened in that/those case(s):

12. Has the Respondent ever gotten or tried to get an Injunction for Protection against Petitioner in this or any other court? Yes No

If YES, list case number(s) and what happened in that/those case(s):

13. Petitioner is a victim of stalking because Respondent has: {mark all sections that apply}

a. Committed stalking;

b. Previously threatened, harassed, stalked, cyberstalked, or physically abused the Petitioner;

c. Threatened to harm the petitioner or family members or individuals closely associated with the petitioner.

d. N/A Intentionally injured or killed a family pet;

e. N/A Used, or has threatened to use, against Petitioner any weapons such as guns or knives;

f. UNK A criminal history involving violence or the threat of violence, if known; enforcement.

g. Another order of protection issued against him or her previously from another jurisdiction, if known;

h. UNK Destroyed personal property, including, but not limited to, telephones or other communication equipment, clothing, or other items belonging to Petitioner.

14. Below is a description of the specific incidents of stalking or cyberstalking:

The Petitioner, (a sitting City Commissioner for the City of North Miami Beach), states that the Respondent is generally unknown to the Petitioner; but the Respondent has been harassing the Petitioner.

The Petitioner states that on March 4, 2022, the Respondent posted images of the Petitioner in a bathing suit while at a hotel on her blog. The Petitioner states that the images were taken in September 2021.

The Petitioner states that in 2018, the Respondent made false allegations against the Petitioner, which the Respondent was made to retract.

The Petitioner states that the Respondent constantly harassed the Petitioner during her campaign for office in 2015.

The Petitioner states that the Respondent regularly comments on social media platforms that the Petitioner is a criminal; often using derogatory terms.

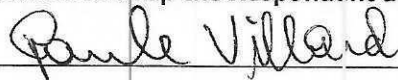
The Petitioner states that the Respondent has made approximately 40 false complaints to the Dade County and Florida Ethics Commissions; all of which have been found to be non-credible.

The Petitioner states that the Respondent makes numerous public records request regarding the Petitioner, and questions actions and proposals made by the Petitioner in her official capacity.

The Petitioner states that she has observed vehicles, unknown to her, (some with no tags), stationed outside of her residence on numerous occasions. The Petitioner states that she is also regularly followed by unknown vehicles.

The Petitioner states that the Respondent has engaged in a pattern of harassment and stalking over the past 7 seven years. The Petitioner states that she fears that the Respondent's stalking behavior will escalate endangering her life and the life of those around her including her children. The Petitioner states that the Respondent's actions have led to the Petitioner being assigned a protective detail by North Miami Beach Police. The Petitioner states that the Respondent's actions have caused emotional and physical health concerns for the Petitioner; leading the Petitioner to seek medical attention.

The Petitioner states that she fears the Respondent and is seeking the court's intervention and protection to keep the Respondent away from her. (COC-DLC)



15. **Petitioner alleges the following additional information:**

a. that the Respondent personally owns, possesses, and / or is known to possess a firearm: Yes No Unknown

If YES, what type: _____

b. It is currently required for the Respondent to carry/use a firearm in the capacity of his/her job: Yes No Unknown

c. that the Respondent has a drug problem: Yes No Unknown

If YES, what type: _____

d. that the Respondent has an alcohol problem: Yes No Unknown

e. That the Respondent has a history of clinically diagnosed mental health problems: Yes No Unknown

If YES, what type: _____

f. Petitioner has known Respondent since (date): FEBRUARY 2015

g. Respondent served in the U.S. military: Yes No Unknown

16. **WHEREFORE, the Petitioner asks the Court to give an injunction (mark the appropriate section[s]):**

The Petitioner asks the Court to enter a TEMPORARY INJUNCTION for protection against stalking that will be in place from now until the scheduled hearing in this matter, which will immediately restrain Respondent from committing any acts of stalking, and which will provide any terms the Court deems necessary for the protection of a victim of stalking, including any injunctions or directives to law enforcement agencies.

Petitioner asks the Court to enter, after a hearing has been held on this petition, a FINAL JUDGMENT for protection against stalking prohibiting Respondent from committing any acts of stalking against Petitioner **and**:

NOTE: The Court may consider the following "Ex parte" (without notice and hearing). This relief may be awarded for up to 15 days.

a. Prohibiting the Respondent from going to or within 500 feet of any place Petitioner lives at

<Confidential>

or to any specified place frequented regularly by Petitioner and any named family members or individuals closely associated with Petitioner;

(IDENTIFY ALL PLACES BY NAME, ADDRESS, AND RELATIONSHIP OF PERSON(S) ON PREMISES TO PETITIONER, IF APPLICABLE.)

- b. Keeping the Respondent away from the current place of employment or school of the Petitioner located at:

**NORTH MIAMI BEACH COMMISSIONER
17011 NE 19 AVE
NORTH MIAMI BEACH, FL 33162**

or any future place of employment or school of Petitioner in the State of Florida.

- c. Prohibiting Respondent from contacting Petitioner by telephone, mail, by e-mail, in writing, through social media, through another person, or in any other manner;
- d. Ordering Respondent that he or she shall not have in his or her care, custody, possession or control any firearm;
- e. Prohibiting Respondent from knowingly and intentionally going within 100 feet of Petitioner's motor vehicle, whether or not that vehicle is occupied.
- f. Ordering such other relief as the Court decides is needed to protect a victim of stalking, including injunctions or directives to law enforcement agencies.

NOTE: The Court may consider the following only with notice and hearing to the Respondent. These things may be ordered by the Court and remain in effect until modified or dissolved by the judge at either party's request, after further notice and hearing.

- g. Continuing the relief requested in a - f above, until modified or dissolved by the court.
- h. Ordering Respondent to go to a batterers' intervention program and/or other Treatment.
- i. Other: _____

I UNDERSTAND THAT BY FILING THIS PETITION, I AM ASKING THE COURT TO HOLD A HEARING ON THIS PETITION, THAT BOTH THE RESPONDENT AND I WILL BE NOTIFIED OF, THE HEARING, AND THAT I MUST APPEAR AT HEARING.

I HAVE READ EVERY STATEMENT MADE IN THIS PETITION AND I DECLARE THAT EACH STATEMENT IS TRUE AND CORRECT. I UNDERSTAND THAT THE STATEMENTS MADE IN THIS PETITION ARE BEING MADE UNDER PENALTY OF PERJURY, PUNISHABLE AS PROVIDED IN SECTION 837.011 FLORIDA STATUTES, AND IF I HAVE MADE A KNOWINGLY FALSE STATEMENT, I MAY BE PROSECUTED..

P.V.

(Initials)

03/16/2022

Date

Paule Villard

Signature of Petitioner

Name: PAULE VILLARD

Address: <Confidential>

Telephone No. <Confidential>

(DO NOT ENTER IF ADDRESS AND PHONE TO BE KEPT CONFIDENTIAL, FOR SAFETY.)