



Florida Commission on Ethics
 P. O. Drawer 15709, Tallahassee, Florida 32317-5709
 "A Public Office is a Public Trust"

FLORIDA
 COMMISSION ON ETHICS

MAY 25 2023

COMPLAINT
23-115

RECEIVED
 ORIGINAL

1. PERSON BRINGING COMPLAINT:

Name: Michael Eisner Telephone Number: 516-672-3958
 Address: 1515 Riverside Dr
 City: Tarpon Springs County: Pinellas State: Florida Zip Code: 34689

2. PERSON AGAINST WHOM COMPLAINT IS BROUGHT:

Use a separate complaint form for each person you wish to complain against:
 Name: Peter Panagiotis Koulias Telephone Number: 727-421-3499
 Address: 595 Peninsula Ave.
 City: Tarpon Springs County: Pinellas Zip Code: 34689
 Title of office or position held or sought: Commissioner Sear 4 Tarpon Springs

3. STATEMENT OF FACTS:

Please provide a full explanation of your complaint, describing the facts and the actions of the person named above and why you believe he or she violated the law. Include relevant dates and the names and addresses of persons whom you believe may be witnesses. Please do not submit more than 15 pages, including this form. Please do not submit video or audio tapes, CDs, DVDs, flash drives or other electronic media; such material will not be considered part of the complaint and will be returned.

4. OATH

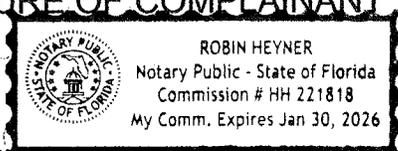
STATE OF Florida
 COUNTY OF Pinellas

I, the person bringing this complaint, do swear or affirm that the facts set forth in the foregoing complaint and attachments thereto are true and correct to the best of my knowledge and belief.

Sworn to (or affirmed) and subscribed before me by means of physical presence or online notarization, this 18 day of May, 2023, by Michael Eisner.
 (name of person making statement)

Michael Eisner
 SIGNATURE OF COMPLAINANT

R. Heyner
 (Signature of Notary Public)
R. Heyner
 (Print, Type, or Stamp Commissioned Name of Notary Public)



Personally Known OR Produced Identification
 Type of Identification Produced: _____

Tom Trask resignation letter

Agreement Between the City of Tarpon Springs and Trask Daigneault, LLP for City Attorney Services dated September 14, 2021

Thomas Trask <tom@cityattorneys.legal>

Fri 9/9/2022 1:56 PM

To: Costa Vatikiotis <cvatikiotis@ctsfl.us>; Craig Lunt <dunt@ctsfl.us>; Jacob Karr <jkarr@ctsfl.us>; Panagiotis Koulias <pkoulias@ctsfl.us>; Mike Eisner <meisner@ctsfl.us>

Cc: Mark LeCouris <mlecouris@ctsfl.us>; Irene Jacobs <ijacobs@ctsfl.us>; Jay Daigneault <Jay@cityattorneys.legal>

External Email- Use caution with links and attachments

September 9, 2022

City of Tarpon Springs Board of Commissioners
324 E. Pine Street
Tarpon Springs, FL 34689

Re: Agreement Between the City of Tarpon Springs and Trask Daigneault, LLP for City Attorney Services dated September 14, 2021

Dear Mayor, Vice Mayor, Commissioners:

Over the last several months, I and other members of this law firm (Firm) have been subjected, at public meetings and other forums including social media, to multiple accusations of unlawful or unethical conduct originating both here in Tarpon Springs and in other communities represented by the Firm. These false accusations have wrongfully maligned the reputation of the Firm and its attorneys and will be addressed in an appropriate manner. Unfortunately, it is now clear that members of the Board of Commissioners have been strongly influenced by these false, defamatory, and tortious accusations, and intend to sever the City's decades-long relationship with the Firm based upon them. It is also now obvious the Firm will continue to be subject to the baseless public attacks and accusations, which will continue to cause extraordinary harm to the Firm, if we continue to represent the City. While I am extraordinarily proud of the Firm's twenty-six-year record of diligent and professional representation of the City's legal interests, I will not subject myself or the Firm to several more months of false allegations and baseless public attacks and allow the Firm to suffer the reputational and financial harm that would result. Accordingly, the Firm has no choice now but to provide the City of Tarpon Springs, pursuant to Paragraph 9 of the above referenced Agreement, thirty (30) days' notice of the termination of the City Attorney Services agreement. Under the terms of the Agreement, the Firm's last day will be October 9, 2022. Our firm would like to thank your peerless City staff and the residents of Tarpon Springs for the privilege of representing the City for the past twenty-six years. Tom



Thomas J. Trask, Esquire
Board Certified in City, County and Local Government Law
AV Preeminent® Rated Attorney
TRASK DAIGNEAULT, LLP
Harbor Oaks Professional Center
1001 South Ft. Harrison Avenue, Suite 201
Clearwater, FL 33756
Phone: (727) 733-0494 (Ext. 103)
Fax: (727) 733-2991
E-Mail: tom@cityattorneys.legal

CONFIDENTIALITY, DISCLOSURE, AND WRITING INSTRUCTION NOTICES

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Koulias letter stating I fired Tom Trask
insulting ex parte communication + threatening
not to attend BOC workshop.



CITY OF TARPON SPRINGS, FL

OFFICE OF MAYOR AND COMMISSIONERS

324 East Pine Street
P.O. Box 5004
Tarpon Springs, Florida 34688-5004
(727) 942-3590
Fax (727) 937-8199

MEMORANDUM

To: Honorable Mayor and Board of Commissioners
From: Commissioner Panagiotis Koulias
Cc: City Manager, Attorney Kardash, Attorney Salzman
Date: May 10, 2023
Subject: May 17, 2023 Work Session

I have some deep concerns regarding statements made by the Mayor at our last BOC meeting on May 9, 2023. The upcoming "workshop" on May 17, 2023 was supposed to concentrate on ethics as well as being able to air our grievances out amongst board members as the Mayor stated at the Oath of Office meeting. Based on the Mayor's statements yesterday, it appears I will once again be silenced and if this is the issue, I would prefer not to even appear at this so-called workshop. We all ran on transparency, and for some reason there is a great deal of hesitancy on the Mayor's part to allow me to address certain issues that the public is interested in hearing about in particular the issues surrounding Mr. Eisner and City Attorney Salzman.

This workshop is an opportunity to have both city attorneys present as I feel as though I am getting conflicting opinions from both attorneys regarding Mr. Eisner and the potential conflict with Attorney Salzman. This workshop will go a long way to resolve issues if all the issues are addressed by all the parties. Mr. Eisner can either hide behind his claim of attorney / client privilege and confidentiality or he can simply waive it as to city matters, including those surrounding the hiring of Attorney Salzman as well as the firing of Attorney Trask.

I feel we will need an hour to discuss this potential conflict of interest issue with regards to Mr. Eisner and Attorney Salzman. I requested this item to be put on the Work Session agenda, if I do not see it on the agenda, I will not be attending.

Cordially,

Panagiotis Koulias

BOC meeting Commissioner Koulias's (PK's) Rant Watch on Zoom, City of Tarpon Springs BOC meeting, April 11, 2023 at time mark 3:25 minutes

All the topics of Koulia's Rant. page 1

PK's disappointed and embarrassed

Harry Pastilides case was an embarrassment. Your actions, attitude and questioning were disgusting. Questioning was flat out disrespectful

Attorney Pastilides never announced he was PK's attorney.

Linda Eisner must resign from Code Enforcement

Never said under my breathe "You're killing me"

Business owners, property owners & community being disrespectful to

Jealous of amount of property Harry P has

Karr had same backup and you said w/o facts

Mr. P's resume – so he obviously doesn't need PK to defend him. He's very smart & established.

Act as Mr P's life coach, give lecture on property management was embarrassing.

You owe Greek community of TS an apology & Mr. P an apology.

Slouched in chair – asked for dress code – wore flashy lights

Wants no slouch policy in our seats. Sit upright w/hands on the table

Position & name plate gets to your head – You are a nobody

Called me a nobody

Was disrespectful to Jacob Karr for an entire year – jabs week after week.

Karr was brought up on ethics

Northeastern unprofessional personality doesn't work here in TS. Nor is it a good fit

Mayor's letter of 4/4 about letting the merchants calm down after BOC. Mike went to speak to Casey about heckling on 3/15. Before letter was sent out.

Mike cannot LET IT GO. He created more division in downtown. Victory Lap. Kissing my hand with all the commerce that CoHatch brings you. Never said.

3/29/23 1:37 am Police Report of harassment – Additional speculation that he won't go into. This is not the behavior of an elected official but rather the behavior of a self REFILLING henchman or even worse a Russian Bolshevik Communist.

He called me ↗

Showing up at people's doors & harassing them just cause they don't agree with him.

Flag Display w/ inappropriate wording. Mike got there first to see it. Breaks chain of command.

Couldn't Let it go: CoHatch application

Received letter from Parish Counsel President (GET COPY) Where is follow up letter from Parish counsel you spoke of? About the parking lot. All hearsay PK.

NEVER SHOWN

PK ran on freedom of residents to speak their minds at podium w/o any harassment or retribution. Community feelings about ME has rubbed off on board.

No texts from spouses moving forward

Attorney ready in line – There is no "We" in Linda's statement.

Asked Mr. Salzman about discussing proposal process with ME. Has it been compromised? PK How has the proposal process been compromised?

Page 2 of Koulias Rant.

Will not allow disrespecting of residents, property owners, business owners & city staff. Must Gavel him down

Hold onto Costas ankles with both hands.

All of our so-called enemies, the ones that opposed us were gotten back 10-fold: Changed land use code, reversed policies, make development harder, push policy

I challenge this board to be creative & come up with policy. I'm not going to allow the disrespect to the residents that I've witnessed. "WHAT HAVE YOU WITNESSED". PK has not spoken to attorneys – don't want to work behind the scenes.

Ask for agenda item with attorney & city manager about any allegations against Eisner

Koulianos didn't like the statement – I'm 68 years old & can't change.

Koulias texting with Linda Eisner



Panagiotis Koulias

JUL 18, 2021 AT 1:15 AM

Hi! Make your posts shareable.

JUL 18, 2021 AT 3:46 PM

Hi Linda. I will. I try to make the ones relating to the city public. Some I don't make public.





Panagiotis



don't make public.

JUL 18, 2021 AT 5:18 PM

I like to share your
brilliancy

SEP 14, 2021 AT 7:05 PM

That was a fabulous
speech!!
Congratulations!! Well
done! Perfect!! Heads
should roll!!

SEP 14, 2021 AT 9:09 PM



Thank you it's time to
boot them all out!

7



Panagiotis



boot them all out! *wow?*

Yes!!!

SEP 21, 2021 AT 12:53 AM

You were awesome tonight. Truth was told and you said it!! So proud!!

SEP 21, 2021 AT 10:05 AM

Thank you Linda! I was happy to see mike last night. He's back!



SEP 21, 2021 AT 10:15 AM

pk to
mike

Happy "Some Day"
Father's Day to a great
man.

JUN 19, 2022 AT 2:10 PM



Thank you thank you!!

JUL 27, 2022 AT 5:47 PM

You were so strong
before the election...You
were the lead on
dissatisfaction of the
attorney. Couldn't even
acknowledge the facts
or mistakes. Basically
kissed him. Sooooo
disappointing. Weak





Panagiotis



JUL 27, 2022 AT 6:30 PM

We have to look at the big picture for Tarpon Springs. I imagine you sent the same text thread to Costa and Craig.



Nope only you? What's the big pic?

It seems you should've sent them the same text message with the positions they took.



Again what's the big pic?

Never answered this question

10

Asking for my resignation



Search



Panagiotis Koulias

6 hours ago · 🌐

1:37 pm 4-13-23 posted.

AS of 4-14-23
1:26 pm
63 likes, heart:
+ wows
28 comments
6 shares

When I ran for office, I ran because I wanted to make sure Tarpon Springs City Government and City Staff didn't misuse their power over the Citizens. That also includes members of the Board of Commissioners. There has been an ongoing issue this past year that had to be addressed. We as elected officials should be held to a higher standard when interacting with the residents, business owners, and City Staff. My position is his resignation. There will be a lot more questions that need to be answered and the response, "It's nobody's business," will not be acceptable.

posted above
reposting of Tracys article //

Check out this great video



THE RECALL FACTS

We are excited to report that there has been an overwhelming response to the recall.

- 2457 site visitors to date in less than 3 weeks
- 112 direct message contacts
- 86 email subscribers



MAY 25 2023

RECEIVED

1515 Riverside Drive, Tarpon Springs, FL 34689 516-672-3958
mike.eisner@gmail.com

5/18/2023

Dear Florida Commission of Ethics:

RE: Commissioner Peter Panagiotis Koulias of Tarpon Springs ethics violator

Attached is my Ethics complaint against Commissioner Peter Panagiotis Koulias (PK) of Tarpon Springs.

1. Commissioner Koulias stated in writing & shared with the BOC and on Facebook that I fired our City Attorney Tom Trask. Attached is Tom Trask's resignation letter and the letter that Commissioner Koulias sent out publicly lying & slandering my name & reputation. This letter also stated I had ex parte communication with our now new attorney Salzman. He also threatened the BOC & City Manager in writing that if his agenda item was not discussed at the work session of 5/17/23 that he would not be attending. The BOC work session which is an annually required 4-hour course on Government & Sunshine, Ethics, Rules & Procedures.
2. Commissioner Koulias publicly accused me of being a conduit using my wife's phone to text with him. This allegation was said during a 15-minute rant at a recorded BOC meeting on April 11, 2023. The entire rant was against me. Watch the rant on Zoom, City of Tarpon Springs BOC meeting, April 11, 2023 at time mark 3:25 minutes. The rant was not an agenda item and I was given no notice to it. It was at the end of our BOC meeting during commissioner comments. The entire rant was a lie. No fact-based information. He was slandering my name & reputation.
3. Commissioner Koulias in his 15-minute rant also demanded that my wife, Linda Eisner resign from the Code Enforcement board. All 5 commissioners voted her onto the board including Commissioner Koulias. No procedure followed or vote requested.
4. Numerous times, Commissioner Koulias publicly and in writing insinuated that Attorney Salzman and I had ex parte communication. No fact-based information. He continues to slander my name & reputation & Attorney Salzman as well. Attorney Salzman & the city manager stated several times, there was no ex parte communication. Koulias is still pushing for me to answer or resign. According to City Attorney Salzman, I am not required to answer.
5. The city is in the middle of a law suit with X-Attorney Tom Trask and I was advised not to discuss anything that could affect the case. Koulias will not let it go. It has gone from rant to telling the community to making BOC demands. Again lying & slandering my name publicly and in writing without any facts.

6. Commissioner Koulias reposted a portion of a Suncoast News article written by Tracy McManus. It says his position is for my resignation as City Commissioner. He has demanded my resignation in several public forums with no evidence, facts or knowledge. All hearsay.
7. Someone created a domain name on Godaddy.com called RecallEisner.com. The creator is private. Whoever the author is has caused me a tremendous amount negative publicity. I believe it was created because of Commissioner Koulias's unfounded accusations.
8. At the 5/17/23 BOC Work Session, Commissioner Koulias yelled out that I was thrown out of 3 Rotary Clubs. Another lie to slander my reputation.
9. Commissioner publicly and in writing called me a "Russian Bolshevik Communist." Listen the rant on Zoom, City of Tarpon Springs BOC meeting, April 11, 2023 at time mark 3:25 minutes.

Enclosures:

1. Attorney Tom Trask Resignation Letter
2. Koulias letter stating I fired Tom Trask, insinuating exparte communication & threatening not to attend the work shop.
3. Recap of all topics Koulias stated in his 15-min rant. 2 pages
4. 5 pages of ongoing texts between Koulias and Linda Eisner
5. Koulias demanding Eisner's resignation
6. Domain RecallEisner.com

Total pages: 14



michael eisner