

City of Prairie Village Code of Ethics Formal Complaint

To: Adam Geffert, City Clerk, City of Prairie Village, KS

From: Anna Gepson, Prairie Village Resident

Date: October 20, 2025

Subject: Formal Complaint. Violations of Prairie Village Code of Ethics ("Ethics Code") by Councilmembers David Robinson, Tyler Agniel, Ian Graves and Mayor Eric Mikkelsen

1. Basis / Authority for Complaint

Notice of the following is given in accordance with requirements of the Ethics Code.

2. Allegations and Facts

Councilmembers David Robinson and Tyler Agniel.

Messrs. David Robinson and Tyler Agniel's exchange of comments and the tone thereof (collectively, the "Robinson/Agniел conduct") are documented at the below hyperlink to the City's livestream record of the City Council meeting on September 15, 2025. The Robinson/Agniел conduct, having been captured in the livestream, will permanently be part of the public record on the City's official website.

The livestream record documents a portion of several minutes during which it is apparent that Messrs. David Robinson and Agniel are ignorant of a dais microphone, resulting in broadcasting the Robinson/Agniел conduct to the livestream audience of an untold number of viewers. The Robinson/Agniел conduct includes Councilmembers David Robinson and Tyler Agniel making comments, laced with extreme profanity, that undermine, ridicule, mock and intimidate me. A transcription of a portion of the Robinson/Agniел conduct refers to me and/or concerns I expressed during the public comment portion of the September 15 meeting. The Robinson/Agniел conduct constitutes multiple violations by Councilmembers David Robinson and Tyler Agniel of the Ethics Code, including its provisions at:

1-212(a)(ii), in that those comments and tone "... are acts or actions that are incompatible with the best interests of the city"; and

1-212 (a)(iii), providing that members of the governing body "... are bound to observe in their official acts the highest standards of morality ..." and "... conduct in both official and private affairs should be above reproach.," and;

1-212(c) that councilmembers be "... civil and professional in the performance of their duties.," in that the comments and tone of Messrs. David Robinson and Tyler Agniel are unprofessional and void of civility as well as intimidating and disparaging (if not also constituting numerous counts of legally actionable slander).

Councilmember Ian Graves.

All of the foregoing facts and allegations are incorporated into this section. At approximately 1:33 of the City's livestream record, Councilmember Ian Graves can be observed turning off the dais microphone. It is virtually certain this action is his response to having observed what was occurring, i.e., the public broadcast of the Robinson/Agniell conduct, or to a viewer of the livestream having alerted him, perhaps via text or similar. That knowledge obligates Councilmember Graves to act in accordance with Ethics Code Section 1-212 (g)(1)(A) providing, in relevant part,

"If member of the governing body believes another member has violated any of the provisions of this code or other state or local law, the member with that belief should first advise the other member of their belief. If the member initiating the concern does not believe the matter has been satisfactorily resolved, such member may file a written complaint as provided below."

Applying a reasonable person standard, Mr. Graves would (or should) have believed the Robinson/Agniell conduct violated the Ethics Code, including the above-cited sections. Thus, under 1-212 (g)(1)(A), Mr. Graves should have advised Messrs. David Robinson and Agniell of his belief. I do not believe that he advised them in that regard, though inquiry of those involved might yield answers. Further applying a reasonable person standard and regardless of

whether he advised Messrs. David Robinson and Agniel under 1-212 (g)(1)(A), Mr. Graves cannot reasonably believe that the Robinson/Agniell conduct, and the resulting Ethics Code violations, have been satisfactorily resolved. He should have filed a written ethics complaint, which I do not believe he has done.

Mayor Eric Mikkelson.

All of the foregoing facts and allegations are incorporated into this section. Similarly to Councilmember Graves, Mayor Eric Mikkelson's failures to address the Robinson/Agniell conduct, including under Ethics Code 1-212(g)(1)(A), violates the Ethics Code, as well as results in further undermining of public confidence in the integrity of the city government.

Mayor Mikkelson, the city's Chief Executive and highest-ranking elected official, has the highest obligation to uphold the Ethics Code. By having immediate knowledge of this incident, he violated the Ethics Code, which states in 1-212(g)(1)(A), in relevant part:

"If member of the governing body believes another member has violated any of the provisions of this code or other state or local law, the member with that belief should first advise the other member of their belief. If the member initiating the concern does not believe the matter has been satisfactorily resolved, such member may file a written complaint as provided below."

Mayor Mikkelson's negligence in performing his duties and responsibilities from the start (i) condones and encourages such unseemly behavior as well, and (ii) shields councilmembers from accountability for clear violations of the Ethics Code, resulting in me bearing the harm from their actions.

In this case, Mayor Mikkelson, to my knowledge, did not advise Councilmembers David Robinson and Agniel of the ethics violation, did not file a written complaint, did not initiate or direct corrective action such as acknowledgment to me or respond to the other residents who raised complaints, did not censure Messrs. David Robinson and Agniel, did not mandate that they issue public apologies, and did not refer their actions to the City Attorney for investigation.

This inaction signals tolerance of misconduct, lack of oversight, and erodes public confidence in city leadership.

The hyperlink to the above referenced livestream is included below. Refer to the September 15 meeting. Note that the auto-generated captions on the livestream are inaccurate, although some of the extreme profanity is documented, in writing, on the livestream and is now on the public record. The uncensored Robinson/Agniel conduct is transcribed verbatim below. The parentheticals are my comments included for reference.

<https://www.pvkansas.com/governing-body/city-council/city-council-meeting-streaming>

Transcript Excerpt (starts at 1:28:30 in the meeting recording) (the “Sept 15 recording”).

David Robinson: *“Ask not what your country can do about the bottle, ask what the bottle can do for you. Hahaha”* (Mocking my comment about the broken glass bottle in the fenced area around the tree.)

Tyler Agniel: *“Hahaha. It’s got a fence around it!”* (Mocking the photo of the broken bottle I emailed to council.)

David: *“Shit comes down to my end of the street and I just, on trash day, I just pick it up and put it in my trash can. I don’t go walking up the street and bitching at my neighbors. I just fucking pick it up. I just fucking pick it up.”* (The Sept 15 recording documents my comments concerning construction debris, not trash [see my comments at 56:15 on the recording]. Any reasonable understanding of my comments makes this clear. Also see the transcription below where Councilmember David Robinson admits knowing my comments concerned construction debris and not a neighbor’s trash. Councilmember David Robinson’s comments constitute “... knowingly misrepresent[ing] information for the purpose of achieving a desired outcome.” Ethics Code, Section 1-212(c). A reasonable understanding of his words undermines, trivializes, and marginalizes my comments, his desired outcome. It is irrelevant to this Complaint, however, whether I was referencing trash or, instead, construction debris.)

David: *“I’ve lived here 44 fucking years!”*

Tyler: *“Hahaha. Every time I see one of her emails, I just hear her little voice.”* (Mocking the sound of my voice, and all the time-stamped photos I emailed to council, which was done at Councilmember Cole Robinson’s suggestion in a July 5 email to me. [Cole Robinson is David Robinson’s son and Ward 1 Councilmember.] In that email, Councilmember Cole Robinson said “We asked the planning commission a couple of times this year to look at studying additional building restrictions on top of the regulations that went into effect in 2019. However, they were uncomfortable making any additional changes without a few more years of data. Part of the data they will consider when they eventually take it back up will be the complaints that we need to make sure make it to the City and end up on the record. I can be helpful with that as need be.” He was clearly suggesting I submit complaints, which is what I did.)

David: *“I asked Ron [Councilmember Ron Nelson], he came by one day and we were just talking and I said ‘What the fuck?.’ The topic came up, [Councilmember Nelson] goes ‘It’s not the bottle, it just gives her something to bitch about.’”* (Mocking my concerns about the broken glass bottle.)

Tyler: *“Yea, one hundred percent.”*

David: *“Just pick it up. Better yet, call Cole [Councilmember Cole Robinson] and have him pick it up.”* (Referencing the glass bottle again. This shows David Robinson knew I was talking about construction sites and not a neighbor’s trash.)

David: *“Her problem is this is just a fact of life in these little Village neighborhoods. I live on a half-acre lot! On a corner!”* (Delegitimizing my concerns due to lot size and location. This also shows David Robinson knew I was talking about construction sites and not a neighbor’s trash.)

David: *“Those block foundations down by the Village Shops are shit.”*

The full exchange runs several minutes and includes repeated profanity, ridicule, and personal attacks. Via the City’s livestream, an untold number of residents watched, heard and read, and can continue to watch, hear and read, the profanity-laced comments on the City’s permanent public record.

3. Relevant Provisions of the Prairie Village Code of Ethics

See above cited Ethics Code sections.

4. Relief and Requested Action

I respectfully request that, due to the inherent conflict of interest posed by the City Attorney's relationship with Mayor Eric Mikkelsen, and the Mayor's profession as an attorney and partner at a national law firm, Stinson, the City Attorney retain independent legal counsel to conduct the investigation of this complaint as authorized under Section 1-212 (g)(ii)(A) of the Ethics Code. This will help ensure an impartial, transparent, and unbiased review of the alleged violations and protect the integrity of the Ethics process.

The investigation and review should include, but not be limited to:

1. Investigate these allegations, including review of recordings, transcripts, emails addressing this incident, and witness statements.
2. Requests for Documentation. As part of the independent investigation, I respectfully request that the attorney obtain and review any and all correspondence related to this complaint between Councilmembers David Robinson, Tyler Agniel, Ian Graves and Mayor Eric Mikkelsen or between Messrs. David Robinson, Agniel, Graves and/or Mikkelsen and any other member of the governing body and/or Prairie Village City administration.

This includes, but is not limited to:

- Oral communications, including those communications documented in meeting notes or memoranda,
- Written communications, including letters or memos,
- Electronic communications, including emails, text messages, or social media messages.

Access to this correspondence is necessary to ensure a thorough and transparent review of the actions and inactions of the involved parties.

3. Conduct in-person interviews with Councilmembers David Robinson, Agniel, Graves, Mayor Mikkelson, and Councilmember Nelson (who, according to David Robinson, remarked, “*It’s not the bottle, it just gives her something to bitch about.*”) to obtain their explanations.
4. Issue findings about whether violations occurred.
5. Forward recommendations consistent with the Ethics Code, including potential censure or other disciplinary measures.
6. Provide a public summary of findings during the council meeting and through any other methods that are appropriate to restore public confidence in the City’s ethical standards.
7. Public Apology and Accountability:

In addition, I request and am owed a written and public apology from Councilmembers David Robinson, Tyler Agniel, Ian Graves, Ronald Nelson, and Mayor Eric Mikkelson. The apology should acknowledge the wrongfulness and hurtfulness of their words and actions, and in the case of Councilmember Graves and Mayor Mikkelson, their failures to act. This apology should be read aloud at a regular City Council meeting and entered into the public record.

A public apology is necessary because the comments made about me are already part of the official public record. Therefore, any apology must also be entered into that same record to acknowledge the harm caused and begin restoring my reputation. Their actions and inactions resulted in public embarrassment, emotional distress, and reputational damage. Failure to intervene or take corrective action by Councilmember Graves and Mayor Mikkelson compounded that harm and sent a troubling message that such misconduct is acceptable.

A sincere and public apology will help make me whole by recognizing the seriousness of the wrongdoing, reaffirming the City’s commitment to ethical governance, and beginning to restore trust between Prairie Village residents and their elected officials. It will also serve as an important step toward accountability by underscoring the gravity of their misconduct and holding them personally responsible for their words and actions or inactions.

Such acknowledgment is essential to restoring public confidence and ensuring that those involved reflect deeply on the egregiousness of their behavior so that similar incidents do not occur in the future.

These allegations of appalling and reprehensible behavior must be taken seriously and thoroughly investigated. As public servants, Councilmembers David Robinson, Agniel, Graves, Nelson, and Mayor Mikkelson are accountable to me, the resident, and not the other way around. I am entitled to any and all remedies appropriate under the Ethics Code and applicable law. If the Ethics Code is not enforced, then what is its purpose and what does it say about the city's commitment to ethical governance if it exists only in words without action?

Disclaimer Regarding Review of the Code of Ethics:

I also respectfully request that the independent counsel assigned to this investigation review the entire Prairie Village Code of Ethics to identify any additional violations by Councilmembers David Robinson, Tyler Agniel, Ian Graves and Mayor Eric Mikkelson, including any other officials related to this complaint, including Councilmember Ronald Nelson and employees in the City administration.

As a private resident bringing this complaint, I cannot be expected to know or interpret the full scope of the Code of Ethics. I am relying on the independent investigator to apply the Code objectively and comprehensively in evaluating the actions and inactions of the officials involved. This complaint should not be construed as a waiver of the investigator's authority to identify other potential violations within the Code.

6. Certification & Signature

I hereby certify that the statements in this complaint are, to the best of my knowledge and belief, true and correct, and that I submit this complaint in good faith to uphold the integrity of Prairie Village's municipal governance.

Signature: _____

Date: _____

Anna Gepson

5313 West 70th Street

Prairie Village, KS 66208

agepson@gmail.com

913-223-0106

Date: _____

Notary Acknowledgement

State of _____

County of _____

On this ____ day of _____ 2025, before me, the undersigned notary public, personally appeared _____, known to me to be the person whose name is subscribed to the foregoing document, and acknowledged that he/she executed the same for the purposes therein contained.

In witness whereof I hereunto set my hand and official seal.

Signature of Notary Public: _____

Printed Name of Notary: _____

My Commission Expires: _____

[Seal]