



Your Challenge...Our Solution

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PERSONAL AND CONFIDENTIAL

February 14, 2024

Macomb County Ethics Board
Talmer Building
Macomb County Government
120 N. Main Street
Mt. Clemens, Michigan 48047

Re: *Ethics Complaint re Peter J. Lucido*

Dear Ethics Board:

I represent Paul Y. Manni as to this and I also represented Mr. Manni in the matter he had in Macomb County Circuit Court. Mr. Manni contacted me after reading about himself online yesterday concerning the Macomb County Prosecutor, Peter J. Lucido.

The article alleges that Mr. Lucido permitted a former candidate for the Sterling Heights City Council to utilize county property, buildings, and offices for the purpose of creating photos for political campaign materials, which would be a violation of the county's ethics ordinance.

I can assure you that this claim is entirely false. Mr. Lucido neither approved nor had any knowledge of the photographs used in my client's campaign literature during his run for the Sterling Heights City Council in 2021.

To support this statement, I have enclosed an Affidavit from my client, Paul Manni, which corroborates the information presented in this letter. I kindly request that each Board Member receives both this letter and my client's Affidavit.

If you have any inquiries for my client or require any additional clarification, please feel free to contact me.

Very truly yours,

BALIAN LEGAL, PLC

Michael J. Balian

MJB/mb

Enclosure

cc: Paul Y. Manni
Peter J. Lucido, Macomb County Prosecutor

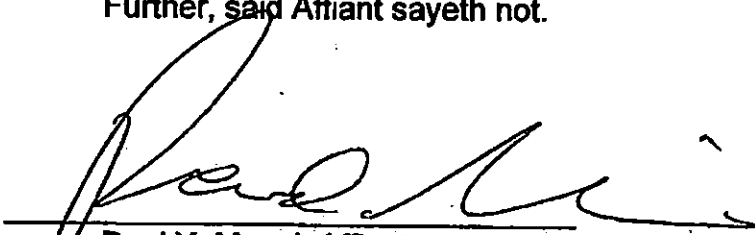
AFFIDAVIT OF PAUL Y. MANNI

STATE OF MICHIGAN)
COUNTY OF OAKLAND) ss.

Paul Y. Manni, being duly sworn, deposes and says:

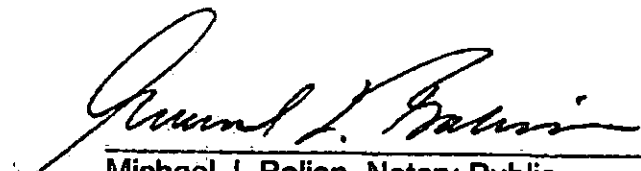
1. In the early part of June 2021, I had a meeting with Peter J. Lucido, who serves as the Prosecuting Attorney. This meeting took place at his office.
2. During our meeting, I requested to take a few pictures of the two of us together.
3. Using my phone, I captured the pictures as desired.
4. Subsequently, after our meeting concluded, I made the decision to incorporate those pictures of us into my campaign literature for the Sterling Heights City Council.
5. I want to clarify that I did not seek or obtain Peter J. Lucido's consent to utilize these pictures in my campaign literature.
6. It is important to note that Peter J. Lucido was not aware of my use of these pictures in my campaign literature.
7. Our discussion during the meeting when those pictures were taken did not touch upon any matters related to political campaign activities or endorsements.

Further, said Affiant sayeth not.



Paul Y. Manni, Affiant

Subscribed and sworn to before me by Paul Y.
Manni on this 13th day of February 2024.



Michael J. Balian, Notary Public
Oakland County, Michigan
My Commission Expires: February 12, 2030

