



## Michigan Senate

March 5, 2020

Senator Mike Shirkey  
Senate Majority Leader  
Capitol Building, Room S-106

Senator Jim Ananich  
Senate Minority Leader  
Capitol Building, Room S-105

### Re: Investigation of Allegations against Senator Peter Lucido

Senators Shirkey and Ananich:

By receipt of a jointly drafted letter on January 15, 2020, I was tasked by both of you to investigate certain allegations of sexual harassment against Senator Peter Lucido as described in a first-person narrative appearing in an online publication that same day by female reporter Allison Donahue. As the Director of the Senate Business Office, pursuant to Senate Rules and the Michigan Senate Policy & Procedure Manual, it is my duty to supervise all discriminatory and sexual harassment investigations involving any Senate employee or Senator. As such, working in conjunction with Nonpartisan Legal Counsel and Human Resources Manager Sueann Mitchell, I initiated an investigation into the matter immediately.

Due to the Senate Business Office's commitment to conduct a thorough and impartial investigation into this complaint and, moreover, in light of the broadened scope of the investigation due to additional allegations in subsequent weeks made by Senator Mallory McMorrow and Melissa Osborn of the Michigan Credit Union League, the Senate Business Office engaged the law firm of Dickinson Wright PLLC to assist with the investigation. The investigative team consisted of Katy Wood and Bill Thacker, both of Dickinson Wright, and Senate employee Sueann Mitchell.

After concluding the investigation, Dickinson Wright delivered the privileged and confidential report to my attention at the Senate Business Office on the afternoon of March 2, 2020. I have had the opportunity to review the report, and Sueann Mitchell and I will be contacting the accusers and the accused to advise each of the investigators' findings.

The attached document provides a summary of the investigative process and the factual conclusions made by the investigators. Pending further instruction from you, the investigation into the above-stated allegations has been concluded.

I am available at your convenience to further discuss this matter.

Sincerely,

A handwritten signature in blue ink that reads "Jordan C. Hankwitz".


Jordan C. Hankwitz  
Director, Senate Business Office



## Michigan Senate

### MEMORANDUM

**TO:** Senator Mike Shirkey  
Senate Majority Leader

**FROM:** Jordan C. Hankwitz   
Director, Senate Business Office

**DATE:** March 5, 2020

**RE:** Summary of Investigative Report

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As the Director of the Senate Business Office, pursuant to Senate Rules and the Michigan Senate Policy & Procedure Manual, it is my duty to supervise all discriminatory and sexual harassment investigations involving Senate employees and Senators. In an effort to conduct a thorough and impartial investigation, the Senate Business Office engaged the law firm of Dickinson Wright PLLC to assist with the investigation of certain allegations made against Senator Peter Lucido. This memo provides a summary of the investigative process and factual findings as described in the March 2, 2020 privileged and confidential report provided by Dickinson Wright.

The investigative team consisted of Katy Wood and Bill Thacker from Dickinson Wright in addition to Nonpartisan Legal Counsel and Human Resources Manager Sueann Mitchell. Working together, the three investigators collectively conducted 35 interviews (either in-person or via telephone) of 25 persons (including parties to the complaints and identified witnesses) and reviewed a variety of evidence and supporting information (including text messages, video footage, diagrams, and audio recordings). The investigators made several attempts to reach all identified witnesses with varying degrees of success. While all Senate employees and Senators who were contacted agreed to be interviewed, some outside witnesses declined to be interviewed or otherwise refused to participate in the investigation.

The investigators reviewed applicable sections of the Michigan Senate Policy & Procedure Manual and Senate Rules, compared their respective interview notes for accuracy, discussed and resolved any resulting discrepancies, and stated their fact findings in a confidential and privileged report delivered to the Senate Business Office on March 2, 2020.

Upon conclusion of the investigation, the investigators concluded that none of the publicized complaints could be unequivocally substantiated. The investigators, therefore, relied on the credibility of interviewees, the examination of evidence, and the recreation of events to the best of their abilities to determine whether each allegation was more likely than not to be true as reported. The investigators found all the accusers to be "credible." Therefore, taking into consideration the totality of the evidence presented, including the number of complaints and similarities among allegations, the investigators concluded it is "more likely than not" that each incident occurred as reported by the accusers in their respective allegations. Furthermore, the investigators concluded that Senator Lucido's conduct

“demonstrates an unfortunate pattern of behavior” that requires “little to no interpretation to be understood as inappropriate workplace behavior.”

Given the findings of the investigation and the likelihood that Senator Lucido acted in the manner described by his accusers, I respectfully defer to you to determine the appropriate action to be taken in accordance with Senate Policy EL 04(G)(2), which provides that appropriate disciplinary action against a senator is “at the discretion of the Senate Majority Leader.” Should you request additional information or assistance from the Senate Business Office, I am available at your convenience to discuss this matter more fully.

Pending further instruction from you, this concludes the investigation into allegations made against Senator Lucido and concludes the Senate Business Office’s duty with respect to this matter.