



March 24, 2022

Re: Case No. 21-1-0901-1

Dear Mx. XXXXXX:

The Seattle Ethics and Elections Commission (SEEC) received your complaint on September 1, 2021. Your complaint alleges that Shamsu Said, a City of Seattle employee, failed to disqualify himself from City business involving an immediate family by assisting his sister's application to join Seattle Public Utilities' (SPU) Utility Discount Program (UDP).

The basis for these allegations is that Mr. Said brought his sister's application to the office, reviewed a form that listed the approval of her application and that he tried to influence an investigation into whether his sister or persons in her household falsified information in the application.

I have determined that the actions taken by Mr. Said violated SMC 4.16.070. Because the violation was minor, though, I am asking the Commission to administratively dismiss the complaint.

Findings

Shamsu Said is a Lead Program Intake Representative (PIR) at SPU. In that position he reviews the work of nonlead PIRs regarding approval into the UDP. Mr. Said is also assigned to conduct outreach to community members who may not be aware of the UDP.

Mr. Said's sister applied for entry into the UDP. He brought her completed application to the office. There is no evidence that he assigned the application to anyone or pressured the person assigned to review the application. The application was approved. There is a list of approval and denials that is reviewed by the Lead PIRs. His sister's approval was on the list he was assigned to review. He did not disclose the relationship or refer it to another PIR.

Some months later, in 2020, a PIR decided to review the application. He determined that the applicants may have made false representations. He brought this to the attention of Mr. Said. Mr. Said sent him two emails requesting information regarding the progress of the investigation.

The PIR said he believed he was being pressured by Mr. Said and brought this to the attention of his supervisor. The supervisor took over the management of the investigation. As a result of the investigation, it was determined that persons in the household did provide false

information and should not have been approved for entry into the UDP. The financial loss to the City was \$2,113.64, which Said's sister was billed for on November 12, 2021.

The initial review of the application granting a UDP was not conducted by Mr. Said. And the evidence does not support the allegation that Mr. Said exerted any pressure on the initial review of the application or the subsequent review. The second review was transferred to another reviewer before conclusions were reached.

Conclusion

Commission Administrative Rule 3.G empowers me to request that the Commission administratively dismiss a complaint when a violation is minor, but not inadvertent. This is such a case. Mr. Said should not have touched his sister's UDP application. But ultimately, he (i) delivered it to the office, (ii) approved the reviewer's determination and (iii) asked for status reports when a second review was underway. I believe his involvement was too minimal to pursue the allegation.

This request for an administrative dismissal will be considered at the Commission's April 6, 2022 meeting. If you have any questions, please do not hesitate to contact me at (206) 684-8500.

Very truly yours,



Wayne Barnett
Executive Director

Cc: Seattle Ethics and Elections Commission (*complainant's name and address redacted*)
Shamsu Said (*complainant's name and address redacted*)