



STATE OF CALIFORNIA
FAIR POLITICAL PRACTICES COMMISSION
1102 Q Street • Suite 3000 • Sacramento, CA 95811
(916) 322-5660 • Fax (916) 322-0886

May 20, 2020

Conrad Hickey

Via email [REDACTED]
[REDACTED]

Re: No Action Closure Letter - FPPC No. 21-00005 In the Matter of Conrad Hickey

Dear Conrad Hickey:

The Enforcement Division of the Fair Political Practices Commission enforces the provisions of the Political Reform Act (the “Act”).¹ As you are aware, the Enforcement Division received an anonymous complaint against you in your former capacity as a Treasurer and in your capacity as a part-time business official for the Ross Valley Charter School District (“District”). Specifically, the complaint alleged that you had a conflict with respect to decisions made by the District to make additional contracts with EdTec, a source of income to you starting in August of 2019.

No public official at any level of state or local government may make, participate in making, or in any way attempt to use their official position to influence a governmental decision in which they know or have reason to know they have a financial interest.² A public official has a financial interest in a decision if it is reasonably foreseeable the decision will have a material financial effect on the official’s financial interest. A financial effect does not have to be likely in order to be considered reasonably foreseeable.

Upon investigation, the Enforcement Division determined that there is insufficient evidence to find that a violation of the Act has occurred. There was insufficient evidence that you participated in or influenced the District’s decision to continue to contract with, amend contracts with, or enter new services contracts with EdTec after you began a part-time position with EdTec. Therefore, we have closed our investigation against you in this matter.

If you have any questions regarding this matter, please feel free to contact me at 916-323-6421.

Sincerely,

Theresa Gilbertson
Senior Commission Counsel
Enforcement Division

¹ The Political Reform Act is contained in Government Code §§ 81000 through 91014, and all statutory references are to this code. The regulations of the Fair Political Practices Commission are contained in §§ 18110 through 18997 of Title 2 of the California Code of Regulations, and all regulatory references are to this source.

² Section 87100.