



STATE OF CALIFORNIA  
**FAIR POLITICAL PRACTICES COMMISSION**  
1102 Q Street • Suite 3050 • Sacramento, CA 95811

May 20, 2025

Courtney de Groof  
On behalf of Robert Steve Russell  
Via email: [cdegroof@lozanosmith.com](mailto:cdegroof@lozanosmith.com)

**Re: No Action Closure Letter: FPPC Case No. 2021-00181, In the Matter of Robert Steve Russell**

Dear All:

The Enforcement Division of the Fair Political Practices Commission (“Commission”) enforces the provisions of the Political Reform Act.<sup>1</sup> This letter arises from an anonymous complaint. Subsequently, a sworn complaint was added to the case. The complaints concerned Robert Steve Russell’s alleged incompatible offices of teacher working for the Amador County Office of Education while also being elected to serve as the Superintendent for Amador County. The allegation of serving in incompatible offices is not within the jurisdiction of the Commission. However, the complaints also raised conflict of interest concerns. Specifically, the complaints alleged that Russell negotiated on behalf of the County Office of Education as Superintendent and then also benefited from a \$1,500 stipend as a teacher and that Russell improperly exempted Russell’s own position from a decision that impacted all other teachers with certain credentials. After a review of the available evidence to determine whether Russell’s conduct may have violated Government Code Section 1090, the Enforcement Division is closing our investigation in this matter due to insufficient evidence of a violation.

Government Code section 1090 states: “Members of the Legislature, state, county, district, judicial district, and city officers or employees shall not be financially interested in any contract made by them in their official capacity, or by any body or board of which they are members. . . .” Courts have interpreted Section 1090 broadly, as the purpose of this conflict of interest provision is to ensure no divided loyalties by those who serve the public.

Russell was elected Superintendent for the Amador County Office of Education in 2018 and stepped down in 2022. As such, Russell was subject to Government Code section 1090, the prohibition against self-interest in government contracts. According to the first complaint received, Russell, as Superintendent, had the authority to negotiate the bargaining agreement between the Special Education of Amador Teachers’ Association and the County’s Office of Education. In 2020, teachers and other county staff received a \$1,500 stipend. The investigation was unable to determine whether Russell participated in or was involved as Superintendent in the negotiation of this stipend extended in December 2020. Russell was not a signatory of the tentative bargaining agreement that proposed the \$1,500 stipend to teachers in December 2020. Further, the evidence

---

<sup>1</sup> The Political Reform Act is contained in Government Code sections 81000 through 91014, and all statutory references are to this code. The regulations of the Fair Political Practices Commission are contained in Sections 18104 through 18998 of Title 2 of the California Code of Regulations, and all regulatory references are to this source.

provided by the County Office of Education suggests that Russell was not a recipient of the stipend granted by this specific agreement. With respect to this complaint, there is insufficient evidence to find a violation of Government Code section 1090.

In addition, the second complaint alleged that Russell improperly remained an employee of the Amador County Office of Education at a time when there was an action to transfer all teachers with mild-moderate special education credentials from the Amador County Office of Education to the Amador County Unified School District. According to Russell, the position Russell served in was to administer individual education plans to students at the county level, including students enrolled through the district and outside of the district. There is insufficient evidence to determine whether Russell participated in a contract to change the terms of Russell's employment. Russell did participate in a contract regarding other employees of the district. However, Russell would have necessarily been prohibited from participating in a contract that determined Russell's own employment status. With respect to this complaint, there is insufficient evidence to find a violation of Government Code section 1090.

Based on the foregoing, we have closed our investigation in this matter. If you have any questions regarding this matter, please feel free to contact me at (279) 237-5960.

Sincerely,

A handwritten signature in black ink, appearing to read 'Theresa Gilbertson', with a stylized, cursive script.

Theresa Gilbertson  
Senior Commission Counsel  
Enforcement Division

CC: Sworn Complainant, Amy Slavensky