



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

October 17, 2025

Juan Figueroa for City Council 2024 Ward 3, Juan Figueroa, and Jennifer Mitchell
Via email: [REDACTED]

Re: No Action Closure Letter: FPPC No. 2024-01395, Juan Figueroa for City Council 2024 Ward 3, Juan Figueroa, and Jennifer Mitchell

Dear All:

The Enforcement Division of the Fair Political Practices Commission (“FPPC”) enforces the City of San Bernardino’s Pay to Play Restrictions. The Enforcement Division opened this case to review a contribution received by the candidate-controlled committee, Juan Figueroa for City Council 2024 Ward 3. However, we have determined that no violation occurred and we are closing the matter with this letter.

The City’s Pay-to-Play Restrictions prohibit an elected official from accepting, soliciting, or directing a contribution of more than \$250 from any party, or their agent, or from any participant, or their agent, while a proceeding involving a license, permit, contract, or entitlement for use is pending before the City and for three months following the date a final decision is rendered. In addition, prior to rendering any decision in a proceeding involving a license, permit, contract, or entitlement for use pending before the City, each elected official who received a contribution since their last campaign statement in an amount of more than \$250 from a party or from any participant shall disclose that fact on the record of the proceeding.

On September 6, 2023, the City Council approved a Memorandum of Understanding between the City and the San Bernardino Police Officer’s Association. On October 12, 2023, the committee, Juan Figueroa for City Council 2024 Ward 3, reported a contribution of \$5,500 from the San Bernardino Police Officer’s Association PAC. Though officials are restricted from accepting contributions from a party that had business before the city within the three months of a final decision on a contract, the ordinance exempts labor contracts from the meaning of contract for purposes of the Pay to Play Restrictions. Therefore, the potential violation has been disproven.

Please do not hesitate to call if you have any questions.

Sincerely,

Theresa Gilbertson
Senior Commission Counsel
Enforcement Division