



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

October 24, 2025

Rubicon Strategies

Principal Address:
1843 Sunningdale Drive
Roseville CA, 95747

Individual Agent:
Samuel Cannon
Via email: cannonsamuel@gmail.com

Warning Letter Re: FPPC No. 2025-00446; Rubicon Strategies and Samuel Cannon

Dear Rubicon Strategies and Samuel Cannon:

The Enforcement Division of the Fair Political Practices Commission enforces the provisions of the Political Reform Act (the “Act”).¹ This letter is in response to a referral from your filing officer, the Secretary of State’s Office, that alleged Rubicon Strategies failed to timely file lobbying firm quarterly reports (Form 625) for the seventh and eighth calendar quarters of the 2019-2020 legislative session.

The Enforcement Division has completed its review of the facts in this case. Specifically, we found that Rubicon Strategies failed to timely file a lobbying firm quarterly report for the reporting period of: July 1, 2020 through September 30, 2020 by the October 31, 2020 due date; and October 1, 2020 through December 31, 2020 by the January 31, 2021 due date.

The Act requires lobbying firms to complete the lobbying firm reports for each calendar quarter, regardless the level of activity.² Lobbying firms are required to file the quarterly reports with the Secretary of State’s Office no later than the end of the calendar month following the reporting period.³

¹ 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.

² Sections 86114, and 86117.

³ Sections 86117 and 86118.

Rubicon Strategies violated the Act because it failed to timely file a lobbying firm quarterly report for the seventh and eighth calendar quarters of the 2019-2020 legislative session. However, since Rubicon Strategies is no longer in operation and has no prior history of violating this section, and there is insufficient evidence that Rubicon Strategies actively lobbied during the relevant time periods, we are closing this matter with this warning letter.

This letter serves as a written warning. The information in this matter will be retained and may be considered should an enforcement action become necessary based on newly discovered information or future conduct. Failure to comply with the provisions of the Act in the future will result in monetary penalties of up to \$5,000 for each violation.

A warning letter is an Enforcement Division case resolution without administrative prosecution or fine. The Commission has adopted Regulations 18360.1 and 18360.2 to authorize the Enforcement Division to issue warning letters to conclude cases in specified circumstances. However, the warning letter resolution does not provide you with the opportunity for a probable cause hearing or hearing before an Administrative Law Judge or the Commission. If you wish to avail yourself of these proceedings by requesting that your case proceed with prosecution rather than a warning, please notify us within ten (10) days from the date of this letter. Upon this notification, the Enforcement Division will rescind this warning letter and proceed with administrative prosecution of this case. If we do not receive such notification, this warning letter will be posted on the Commission's website ten (10) days from the date of this letter.

Please contact me at 279-237-3766 or cfelkins@fppc.ca.gov with any questions you may have regarding this letter.

Sincerely,

Michael Chance Felkins

Chance Felkins, Commission Counsel
Enforcement Division

cc: *Secretary of State's Office*