



STATE OF CALIFORNIA  
FAIR POLITICAL PRACTICES COMMISSION  
1102 Q Street • Suite 3000 • Sacramento, CA 95811

March 17, 2022

Zein Obagi Jr. for Redondo Beach Council District 4 2021 (#1434200)

Zein Obagi Jr., Candidate

Michelle Moore Sanders, Treasurer

Sent via email: [REDACTED]

**RE: No Action Closure Letter; FPPC Case No. 2021-01006**

Dear Zein Obagi Jr. and Michelle Sanders:

The Fair Political Practices Commission enforces the provisions of the Political Reform Act (the “Act”)<sup>1</sup>. The Commission’s Enforcement Division initiated an investigation into whether you and your committee Zein Obagi Jr. for Redondo Beach Council District 4 2021 (the “Committee”) violated the campaign disclosure provisions of the Act by failing to timely report nonmonetary contributions for newspaper advertisements made by the Obagi Law Group.

The Enforcement Division has determined that the allegations have been disproven. The safe harbor exception in Regulation 18215(c) applies to the payments made for the newspaper advertisements because the advertisements did not contain express advocacy, did not make reference to the candidate’s campaign, and did not solicit contributions. Therefore, we are closing this matter without further action.

Thank you for your cooperation. If you have any questions, contact me at [arose@fppc.ca.gov](mailto:arose@fppc.ca.gov).

Sincerely,

*Alex Rose*

Alex Rose  
Commission Counsel  
Enforcement Division

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<sup>1</sup> The Political Reform Act is contained in Government Code sections 81000 through 91014, and all statutory references are to this code.