

BEFORE THE FEDERAL ELECTION COMMISSION OF THE UNITED STATES OF AMERICA

In the Matter of:

Angela Alsobrooks
Alsobrooks for Senate
Jay Petterson, Treasurer

MUR No. 8332

COMPLAINT

1. Complainant brings this complaint before the Federal Election Commission ("FEC" or "Commission") seeking an immediate investigation and enforcement action against Prince George's County Executive Angela Alsobrooks, Alsobrooks for Senate, and Jay Petterson as Treasurer ("Committee") for violations of the Federal Election Campaign Act ("FECA" or "Act").
2. This complaint is filed pursuant to 52 U.S.C. § 30109(a)(1) and is based on information providing reason to believe that:
3. Respondents have violated 52 U.S.C. § 30125(e)(1) and 11 C.F.R. § 300.61 by using state/local campaign funds – which are not subject to federal limitations, prohibitions, and reporting requirements of FECA – in connection with an election for federal office.

STATEMENT OF THE LAW

4. Pursuant to 52 U.S.C. § 30125(e)(1) and 11 C.F.R. § 300.61, candidates for federal office are prohibited from soliciting, receiving, directing, transferring, spending, or disbursing funds in connection with a campaign for federal office unless those funds are subject to the limitations, prohibitions, and reporting requirements of FECA.

STATEMENT OF FACTS

5. On May 9, 2023, Prince George's County Executive Angela Alsobrooks announced her bid for Maryland's U.S. Senate seat.¹ She filed a Statement of Organization for her principal campaign committee, Alsobrooks for Senate, with the FEC on May 9, 2023.²
6. Ms. Alsobrooks currently maintains a Maryland state-level campaign committee called "Friends of Angela Alsobrooks." She has used this committee in her previous campaigns for State's Attorney, as well as in campaigns for her current office, Prince George's County Executive. Her current position as County Executive is term-limited and expires in December 2026.³
7. In her 2024 Annual Campaign Statement for her state committee – which covers the 2023 calendar year – Ms. Alsobrooks reported making significant disbursements beginning in June 2023 for fundraising expenses, *after* she announced her campaign for U.S. Senate. Ms. Alsobrooks' term-limited County Executive position was not on the ballot in 2023, and Ms. Alsobrooks has not announced any campaign for another Maryland state or local office.⁴
8. These state-level "fundraising expenses" disbursements were made to Rice Consulting, a company that bills itself as "Maryland's Top Fundraising Firm for Democrats and Organizations."⁵

¹ Brian Witte, Top Maryland County Leader Alsobrooks Running for US Senate, [Associated Press](#) (May 9, 2023).

² Alsobrooks for Senate, [Statement of Organization](#) (Filed May 9, 2023).

³ Maryland Campaign Reporting Information System, Candidate Committee Registration Information, [Friends of Angela Alsobrooks](#) (Accessed June 12, 2024) (Note: Showing the establishment of the Committee on Apr. 10, 2009, its use for Ms. Alsobrooks State's Attorney and County Executive campaigns, and its current listed status as "Active"); County Code of Prince George's, Maryland Section 3-307A (2019).

⁴ Maryland Campaign Reporting Information System, Candidate Committee Registration Information, [Friends of Angela Alsobrooks](#), Filing Information, Election Cycle, 2023-2026, 2024 Annual (Filed Jan. 16, 2024) (Accessed June 12, 2024) (Note: Showing the establishment of the Committee on Apr. 10, 2009 its current listed status as "Active," and history of relevant disbursements).

⁵ *Id.*; Rice Consulting, [Who We Are](#) (Accessed June 12, 2024).

9. In total, nearly \$18,000 in disbursements to Rice Consulting appear under the “Fundraising Expenses” section of Ms. Alsobrooks’ state report from June to October 2023. All of these disbursements occurred *after* she became a candidate for U.S. Senate in May 2023.⁶

SCHEDULE - 2		Expenditures			
		V - Fundraising Expenses			
(see schedules 1A and 1B for other types of income)					
06/22/2023	Check	Rice Consulting 17 West Courtland Street, Suite 210, Bel Air, Maryland 21014			\$15,397.35
06/22/2023	Check	Rice Consulting 17 West Courtland Street, Suite 210, Bel Air, Maryland 21014			\$1,163.57
06/22/2023	Check	Rice Consulting 17 West Courtland Street, Suite 210, Bel Air, Maryland 21014			\$350.00
10/02/2023	Electronic Check	Rice Consulting 17 West Courtland Street, Suite 210, Bel Air, Maryland 21014			\$925.00

10. Ms. Alsobrooks’ state-level campaign reported raising only \$560 for all of 2023. While there is scant, if not zero evidence, of any state-level fundraising events held in 2023, publicly available information reveals that Ms. Alsobrooks held at least seven *federal* fundraising events in May and June 2023. These include an EMILY’s List fundraiser in New York City that occurred before Ms. Alsobrooks filed as a federal candidate, as well as a private Georgetown gathering hosted by Washington, D.C., Mayor Muriel Bowser on June 22, 2023. On the same date, – June 22, 2023 – Ms. Alsobrooks’ state campaign committee paid Rice Consulting nearly \$17,000 for fundraising expenses. Additionally, five more fundraisers in support of Angela Alsobrooks’ U.S. Senate campaign, all occurring in June 2023, appear directly on Rice Consulting’s events page.⁷
11. The only disbursements made by Ms. Alsobrooks’ committees during this period that could be construed or categorized as “fundraising expenses” appear on Ms. Alsobrooks’ state-level campaign committee reports. In fact, a search of the FEC database indicates that Alsobrooks for Senate did not make a single disbursement for “fundraising” until June 30, 2023, and only after hundreds of thousands of dollars had been raised in support of her U.S. Senate campaign.⁸

CAUSE OF ACTION

⁶ Maryland Campaign Reporting Information System, Candidate Committee Registration Information, [Friends of Angela Alsobrooks](#), Filing Information, Election Cycle, 2023-2026, 2024 Annual (Filed Jan. 16, 2024) (Accessed June 12, 2024); Witte, *supra* note 1.

⁷ Maryland Campaign Reporting Information System, Candidate Committee Registration Information, [Friends of Angela Alsobrooks](#), Filing Information, Election Cycle, 2023-2026, 2024 Annual (Filed Jan. 16, 2024) (Accessed June 12, 2024); [Exhibit A](#); Zachary Basu, Axios Sneak Peek: Maryland’s Wide-Open Senate Race, [Axios](#) (May 1, 2023); Tom Sherwood, Shaken and Stirred: Bowser’s Inner Circle Amid Falcicchio Fallout, [Washington City Paper](#) (June 26, 2023); Alsobrooks for Senate, [Statement of Organization](#) (Filed May 9, 2023); [Exhibit B](#); [Exhibit C](#); [Exhibit D](#); [Exhibit E](#); [Exhibit F](#); [Exhibit G](#).

⁸ Maryland Campaign Reporting Information System, Candidate Committee Registration Information, [Friends of Angela Alsobrooks](#), Filing Information, Election Cycle, 2023-2026, 2024 Annual (Filed Jan. 16, 2024) (Accessed June 12, 2024); Federal Election Commission, Alsobrooks for Senate, Disbursements, 2023-2024, “Fundraising” (2023-2024); “Prince George’s County Executive Angela Alsobrooks Raised \$1.6 Million Last Quarter for Her Maryland Senate Bid,” [Politico](#) (June 30, 2023); [Exhibit A](#); [Exhibit B](#); [Exhibit C](#); [Exhibit D](#); [Exhibit E](#); [Exhibit F](#); [Exhibit G](#).

AGAINST RESPONDENTS ANGELA ALSOBROOKS AND COMMITTEE

Prohibited Use of Nonfederal Funds in Connection with a Campaign for Federal Office in Violation of 52 U.S.C. § 30125(e)(1) and 11 C.F.R. § 300.61

12. After Ms. Alsobrooks filed her Statement of Organization with the FEC on May 9, 2023 – and after she held multiple fundraising events in support of her candidacy for U.S. Senate – her state-level campaign committee, Friends of Angela Alsobrooks, disbursed nearly \$18,000 for what appears to be fundraising expenses in support of her campaign for federal office.⁹ These substantial fundraising expenses indicate that Ms. Alsobrooks' state-level campaign committee was used illicitly to kick-start and then finance her federal campaign for U.S. Senate in its burgeoning stages. The absence of any disbursements for fundraising expenses from her federal campaign committee for nearly the first two months of that federal campaign – even though it reported raising substantial sums – further strengthens the possibility of this financial malfeasance, and is strong evidence of the impermissible use of nonfederal funds.¹⁰
13. By using her state campaign committee – Friends of Angela Alsobrooks – for the purpose of making expenditures in support of her federal campaign for U.S. Senate, Angela Alsobrooks, Alsobrooks for Senate, and Jay Petterson – in his capacity as Treasurer – evaded the limitations, prohibitions, and reporting requirements of FECA in violation of 52 U.S.C. § 30125(e)(1) and 11 C.F.R. § 300.61.

PRAYER FOR RELIEF

14. Wherefore, the Commission should find reason to believe that Angela Alsobrooks, Alsobrooks for Senate, and Jay Petterson – in his capacity as Treasurer – violated 52 U.S.C. § 30125(e)(1) and 11 C.F.R. § 300.61 and conduct an immediate investigation under 52 U.S.C. § 30109(a)(2). The Commission should determine and impose appropriate sanctions for any and all violations. Furthermore, the Commission should enjoin respondents from any future violations, and impose any necessary and appropriate remedies to ensure respondents' future compliance with FECA.

June 12, 2024

Respectfully Submitted,



Caitlin Sutherland, Executive Director
Americans for Public Trust
107 South West Street, Suite 442
Alexandria, VA 22314

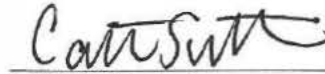
⁹ *Supra*, note 2; [Exhibit A](#); [Exhibit B](#); [Exhibit C](#); [Exhibit D](#); [Exhibit E](#); [Exhibit E](#); [Exhibit G](#); Maryland Campaign Reporting Information System, Candidate Committee Registration Information, [Friends of Angela Alsobrooks](#), Filing Information, Election Cycle, 2023-2026, 2024 Annual (Filed Jan. 16, 2024) (Accessed June 12, 2024).

¹⁰ Federal Election Commission, Alsobrooks for Senate, Disbursements, 2023-2024, ["Fundraising"](#) (2023-2024).

VERIFICATION

15. The complainants listed below hereby verify that the statements made in the attached Complaint are, upon their information and belief, true.

For Complainant "Americans for Public Trust"



Caitlin Sutherland

City of Alexandria
Commonwealth of Virginia

The foregoing instrument was subscribed and sworn to before me this 12th day of June 2024 by Caitlin Sutherland.



Notary Public

Notary registration number: 7969380

My commission expires: 04/30/2025



EXHIBIT A

 **Judith Gelman**
@judygelman

angela Alsobrooks is doing fundraiser in NYC w Emily's List

6:28 PM · May 1, 2023 · 129 Views

Judith Gelman, [Twitter](#) (May 1, 2023)

 **Tom Sherwood**
@tomsherwood

#News - Mayor Muriel Bowser hosted a private Georgetown fundraiser Thursday night for PrGeorge's Executive Angela Alsobrooks, who's running for the US Senate from Maryland. Sources say the fundraiser at the Washington Harbor home of Rusty & Mimsy Lindner raised \$125,000. @wcp

8:41 PM · Jun 23, 2023 · 11K Views

Tom Sherwood, [Twitter](#) (June 23, 2023)

EXHIBIT B

ANGELA ALSOBROOKS FOR U.S. SENATE

Join us June 17th in support of Angela Alsobrooks for Senate

Make gifts as for a Receipts issued by: [Angela Alsobrooks](#)

Member Host Committee:
Bobbie Shuman, Michael J. Saperstein, D-DC District
Jennifer M. Runkel, Elizabeth
David Zimmerman, Pennsylvania

Co-Host Committee:
Carm Beale, Jean-Philippe, Diana Conroy, Cole Grier
Morgan Harlan, Sarah Jackson, D-Delaware
Hannah Kibben, Charles R. Korman
Suzanne Mulvaney, Peter M. Jones, USA, Tennessee
(Suzanne Mulvaney is a volunteer)

For information or tickets visit:
[Angela Alsobrooks](#)
1700 Pennsylvania Avenue, NE
Washington, DC 20002-4242

Support by June 17, 2024
4,000+ in Host Receipts
\$100,000+ in Receipts

Location provided upon RSVP

To make a contribution, please contact:
Angela Alsobrooks for Senate
PO Box 3030
Lanham, MD 21070

There's nothing more we can do for you!
(410) 326-4242

11700000 20 Dollars 10 Payments

Name: \$500.00

Duration: \$500.00

Start: 2,000.00

Additional comments:

Gift this today: \$0.00

Checkout: Have an ActBlue Express account? [Sign in](#)

DISCLAIMER:

1. This is a 501(c)(3) organization and all contributions are tax-deductible.
2. This contribution is made from my own funds, and funds are not being provided to make another person or entity the beneficiary of this contribution.
3. I am not making a political statement.
4. I am not a 501(c)(3) organization.
5. I am making this contribution with my own personal funds and not with any organization or business, and I am not a 501(c)(3) organization.

Paid for by Angela Alsobrooks for Senate

Paid for by ActBlue ([actblue.com](#)) and not authorized by any candidate or candidate's committee.

Contributions or gifts to ActBlue are not deductible as charitable contributions for Federal income tax purposes.

Angela Alsobrooks for U.S. Senate, Join Us June 17th in Support of Angela Alsobrooks for Senate, [Angela Alsobrooks for U.S. Senate-ActBlue](#) (June 17, 2023)

EXHIBIT D

ANGELA ALSOBROOKS

FOR U.S. SENATE

Join us June 27th in support of Angela Alsobrooks for Senate

Please join us on Friday, June 27th (Host Counts for us if you're not)

For a Reception in support of

ANGELA ALSOBROOKS
Former Governor of Maryland, Former U.S. Representative
 Democratic Candidate for U.S. Senate in Maryland

Tuesday, June 27, 2023
 5:30-7:00PM

Clinton, Maryland
 Address provided upon RSVP

To make a contribution, please send to:
 Angela Alsobrooks for Senate
 PO Box 4906
 Largo, MD 21074

Please create a Facebook event with the following link:
<https://www.facebook.com/angelaalsobrooksforus>

1) Tickets 2) Details 3) Payment

What's your role?

Host	3,300.00 each	<input type="text" value="0"/>
Co-Host	1,000.00 each	<input type="text" value="0"/>
Friend	500.00 each	<input type="text" value="0"/>

Additional contribution
 Can't attend? Make a contribution instead!

Total due today: \$0.00
Has contribution will benefit Angela Alsobrooks

Checkout

Have an ActBlue event account? [Sign up to give faster](#)

CONTRIBUTION INFO

1. ActBlue (ActBlue is a fully-subscribed service provider (i.e., not a candidate))
2. This contribution is made from my own funds, and funds are not being provided to me by another person or entity for the purpose of making this contribution.
3. I am at least 18 years of age and
4. I am not a federal official.
5. I am making this contribution with my own personal credit card and not with a corporate or business credit card or a card issued to another person.

Paid for by Angela Alsobrooks for Senate

By proceeding with this transaction, you agree to ActBlue's [terms & conditions](#).

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 Contributions or gifts to ActBlue are considered as charitable contributions for federal income tax purposes.

Angela Alsobrooks for U.S. Senate, Join Us June 27th in Support of Angela Alsobrooks for Senate, Angela Alsobrooks for U.S. Senate ActBlue (June 27, 2023)

EXHIBIT E

Join us June 28th in support of Angela Alsobrooks for Senate

Please join
Bill Chesley, Ed Qibbe, Tim Graham, Gary Michael and
Steve Proctor
(Host Donorship in Formation)

for a reception in support of

Angela Alsobrooks
 Prince Georges County Executive & former
 Democratic Candidate for U.S. Senate in Maryland
 with special guests
 Congressman Bruce L. Lenoir,
 State Treasurer Denise E. Dashi

Wednesday, June 28, 2023
 6:30-7:00 PM Host Reception
 7:00-10:30 Private Reception

United Methodist, Maryland
 14000 Phillips Branch ACIP

To make an in-person contribution to
 Angela Alsobrooks for Senate
 PO Box 6008
 Largo, MD 20772

Please contact the staff for any questions
 galsobro@angelaalsobrooks.com | 410-331-0300

1) Tickets
2) Details
3) Payment

Select your ticket level:

Host	\$600.00 each	0
Co-Host	2,300.00 each	0
Friend	1,000.00 each	0
Guest	500.00 each	0

Additional contribution
 Can't attend? Make a donation instead

Total due today: \$0.00

Your contribution will benefit Angela Alsobrooks

Checkout

Have an ActBlue Estimated count? [Sign up to opt in!](#)

Pay with card

PayPal

G Pay

venmo

Contribution rules

- I am a U.S. citizen or lawfully admitted permanent resident (i.e., green card holder)
- The contribution is made from my own funds, and funds are not being provided to me by another person or entity for the purpose of making this contribution
- I am not making a political contribution
- I am not making a charitable contribution
- I am making this contribution with my own personal credit card and not with a corporate or business credit card or a card issued to another person

Paid for by Angela Alsobrooks for Senate

By proceeding with this transaction, you agree to ActBlue's [terms & conditions](#).

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 Contributions or gifts to ActBlue are not deductible as charitable contributions for Federal income tax purposes.

Angela Alsobrooks for U.S. Senate, Join Us June 28th in Support of Angela Alsobrooks for Senate, Angela Alsobrooks for U.S. Senate ActBlue (June 28, 2023)

EXHIBIT G

<p>Please join us for a Reception hosted by Steve & Diane Proctor in support of Angela Alsobrooks, Prince George's County Executive & Democratic Candidate for U.S. Senate in Maryland</p> <p>Saturday, June 17, 2023 4:00 PM Host Reception 5:00 PM Guest Reception</p> <p>Address provided upon RSVP</p> <p>Click here for more information and to RSVP</p>
<p>Please join us for a Reception hosted by Justin Ross in support of Angela Alsobrooks, Prince George's County Executive & Democratic Candidate for U.S. Senate in Maryland</p> <p>Saturday, June 24, 2023 4:00 - 5:30 PM</p> <p>Address provided upon RSVP</p> <p>Click here for more information and to RSVP</p>
<p>Please join us for a Reception in support of Angela Alsobrooks, Prince George's County Executive & Democratic Candidate for U.S. Senate in Maryland</p> <p>Tuesday, June 27, 2023 5:30 - 7:00 PM</p> <p>Address provided upon RSVP</p> <p>Click here for more information and to RSVP</p>
<p>Please join us for a Reception hosted by Tom Graham in support of Angela Alsobrooks, Prince George's County Executive & Democratic Candidate for U.S. Senate in Maryland</p> <p>Wednesday, June 28, 2023 6:30 - 7:00 PM Host Reception 7:00 - 8:30 PM Friends Reception</p> <p>Address provided upon RSVP</p> <p>Click here for more information and to RSVP</p>
<p>Please join us for a Reception hosted by Manervia Riddick in support of Angela Alsobrooks, Prince George's County Executive & Democratic Candidate for U.S. Senate in Maryland</p> <p>Thursday, June 29, 2023 6:00 - 8:00 PM</p> <p>Copper Canyon Grill Woodmore Town Center, 9300 Taj Ln Glenarden, MD 20706</p> <p>Click here for more information and to RSVP</p>

Rice Consulting, Please Join Us for A Reception Hosted by Steve & Diane Proctor in Support of Angela Alsobrooks, Prince George's County Executive & Democratic Candidate for U.S. Senate in Maryland, [Internet Archive Wayback Machine](#) (June 17, 2023; Archived June 9, 2023); Rice Consulting, Please Join Us for A Reception Hosted by Justin Ross in Support of Angela Alsobrooks, Prince George's County Executive & Democratic Candidate for U.S. Senate in Maryland, [Internet Archive Wayback Machine](#) (June 24, 2023; Archived June 9, 2023); Rice Consulting, Please Join Us for A Reception in Support of Angela Alsobrooks, Prince George's County Executive & Democratic Candidate for U.S. Senate in Maryland, [Internet Archive Wayback Machine](#) (June 27, 2023; Archived June 9, 2023); Rice Consulting, Please Join Us for A Reception Hosted by Tom Graham in Support of Angela Alsobrooks, Prince George's County Executive & Democratic Candidate for U.S. Senate in Maryland, [Internet Archive Wayback Machine](#) (June 28, 2023; Archived June 9, 2023); Rice Consulting, Please Join Us for A Reception Hosted By Manervia Riddick in Support of Angela Alsobrooks, Prince George's County Executive & Democratic Candidate for U.S. Senate in Maryland, [Internet Archive Wayback Machine](#) (June 29, 2023; Archived June 9, 2023)