

BEFORE THE FEDERAL ELECTION COMMISSION

ENFORCEMENT PRIORITY SYSTEM

DISMISSAL REPORT

MUR 8332

Respondents: Angela Alsobrooks
 Alsobrooks for Senate and Jay Petterson
 in his official capacity as treasurer
 Friends of Angela Alsobrooks

Complaint Receipt Date: Oct. 16, 2024

Response Date: Jan. 6, 2025

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Alleged Statutory and Regulatory Violations: 52 U.S.C. §§ 30101(22), 30125(e)
 11 C.F.R. §§ 100.26, 110.3(d), 300.2(c), 300.61, 300.62,
 300.63

The Complaint alleges that 2024 Senate candidate and Prince George’s County Executive, Angela Alsobrooks, her state committee, Friends of Angela Alsobrooks (the “State Committee”), and her principal campaign committee, Alsobrooks for Senate and Jay Petterson as treasurer (the “Federal Committee”),¹ violated the Federal Election Campaign Act of 1971, as amended (the “Act”), when the State Committee made up to \$17,836 in disbursements for “fundraising expenses” that the Complaint alleges supported Alsobrooks’s federal campaign.² The Complaint infers that the disbursements benefited the Senate campaign because Alsobrooks was term-limited as a county executive at that time and therefore did not need to fundraise on the state level, the State Committee had not raised much money previously, the Federal Committee did not spend any money on fundraising during the first two months of the campaign, and Alsobrooks held several federal fundraisers during the period in which the disbursements were made whereas there is no apparent

¹ Angela Alsobrooks Statement of Candidacy (Nov. 17, 2024), <https://docquery.fec.gov/pdf/937/202411179719987937/202411179719987937.pdf>; Alsobrooks for Senate Statement of Organization (Dec. 4, 2024), <https://docquery.fec.gov/pdf/464/202412049720210464/202412049720210464.pdf>.

² Compl. at 1 (Oct. 16, 2024); *see also* Maryland State Board of Elections, Friends of Angela Alsobrooks, 2024 Annual Campaign Finance Summary (Filed Jan. 16, 2024), campaignfinance.maryland.gov/Public/ShowReview?memberID=5229 &memVersID=105 &cTypeCode=01 (reflecting amounts State Committee disbursed for “fundraising expenses” during the relevant period).

1 evidence of any state fundraisers.³ In addition, the Complaint notes that Alsobrooks held a
2 fundraiser the same day that the State Committee reported disbursements for fundraising and that
3 the State Committee paid the same company that ran Alsobrooks's federal fundraisers.⁴

4 Respondents filed a joint Response denying the allegations.⁵ The Response asserts that
5 Alsobrooks was a state candidate at the time of the disbursements, services are often billed and paid
6 for after the service is performed, and that it is only coincidence that the funds were disbursed the
7 same day as one of her federal fundraisers.⁶

8 Based on its experience and expertise, the Commission has established an Enforcement
9 Priority System using formal, pre-determined scoring criteria to allocate agency resources and
10 assess whether particular matters warrant further administrative enforcement proceedings. These
11 criteria include (1) the gravity of the alleged violation, taking into account both the type of activity
12 and the amount in violation; (2) the apparent impact the alleged violation may have had on the
13 electoral process; (3) the complexity of the legal issues raised in the matter; and (4) recent trends in
14 potential violations and other developments in the law. This matter is rated as low priority for
15 Commission action after application of these pre-established criteria. Given that low rating, and the
16 apparent low dollar amount involved, we recommend that the Commission dismiss the Complaint,
17 consistent with the Commission's prosecutorial discretion to determine the proper ordering of its
18 priorities and use of agency resources.⁷ We also recommend that the Commission close the file as
19 to all Respondents effective 30 days after the date of certification of this vote is signed (or on the

³ *Id.*

⁴ *Id.* at 2.

⁵ Resp. at 2 (Jan. 6, 2025).

⁶ *Id.* at 3.

⁷ *Heckler v. Chaney*, 470 U.S. 821, 831-32 (1985).

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1 next business day after the 30th day, if the 30th day falls on a weekend or holiday) and send the
2 appropriate letters.

Lisa J. Stevenson
Acting General Counsel



BY:

Claudio J. Pavia
Deputy Associate General Counsel

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9 February 28, 2025

10 Date

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14 Aaron Rabinowitz
15 Aaron Rabinowitz
16 Assistant General Counsel

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19 Pam Keller
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21 Attorney