



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C.

April 14, 2025

**VIA ELECTRONIC MAIL**

[JMRyan@Venable.com](mailto:JMRyan@Venable.com)

[DEOwens@Venable.com](mailto:DEOwens@Venable.com)

Janice M. Ryan & David E. Owens

Venable LLP

600 Massachusetts Ave NW

Washington, DC 20001

RE: MUR 8332  
Angela Alsobrooks *et al.*

Dear Ms. Ryan and Mr. Owens:

On October 23, 2024, the Federal Election Commission notified your clients, Angela Alsobrooks, Alsobrooks for Senate and Jay Petterson in his official capacity as treasurer, and Friends of Angela Alsobrooks, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended (the "Act"). A copy of the complaint was forwarded to your clients at that time.

Upon further review of the allegations contained in the complaint, and information supplied by your clients, the Commission, on March 12, 2025, voted to dismiss this matter and close the file effective April 14, 2025. The General Counsel's Report, which more fully explains the Commission's decision, is enclosed for your information.

Documents related to the case will be placed on the public record today. *See* Disclosure of Certain Documents in Enforcement and Other Matters, 81 Fed. Reg. 50,702 (Aug. 2, 2016).

If you have any questions, please contact Pam Keller, the attorney assigned to this matter, at (202) 694-1650.

Sincerely,

*Aaron Rabinowitz*

Aaron Rabinowitz  
Assistant General Counsel

**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”),<sup>1</sup> 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.<sup>2</sup> 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

<sup>1</sup> 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>.

<sup>2</sup> 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](https://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.<sup>3</sup> 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.<sup>4</sup>

4 Respondents filed a joint Response denying the allegations.<sup>5</sup> 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.<sup>6</sup>

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.<sup>7</sup> 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

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<sup>3</sup> *Id.*

<sup>4</sup> *Id.* at 2.

<sup>5</sup> Resp. at 2 (Jan. 6, 2025).

<sup>6</sup> *Id.* at 3.

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


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EPS Dismissal Report  
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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.

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February 28, 2025  
Date

Lisa J. Stevenson  
Acting General Counsel

BY:   
Claudio J. Pavia  
Deputy Associate General Counsel

Aaron Rabinowitz  
Aaron Rabinowitz  
Assistant General Counsel

Pam Keller  
Pam Keller  
Attorney