

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. \_\_\_\_\_

**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.<sup>1</sup> She filed a Statement of Organization for her principal campaign committee, Alsobrooks for Senate, with the FEC on May 9, 2023.<sup>2</sup>
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.<sup>3</sup>
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.<sup>4</sup>
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.”<sup>5</sup>

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

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

<sup>3</sup> 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).

<sup>4</sup> 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).

<sup>5</sup> *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.<sup>6</sup>

<b>SCHEDULE - 2</b>		<b>Expenditures</b>			
		<b>V - Fundraising Expenses</b>			
<i>(see schedules 1A and 1B for other types of Income)</i>					
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 EMILYs 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.<sup>7</sup>
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.<sup>8</sup>

## **CAUSE OF ACTION**

<sup>6</sup> 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.

<sup>7</sup> 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](#).

<sup>8</sup> 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.<sup>9</sup> 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.<sup>10</sup>
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,

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

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<sup>9</sup> *Supra*, note 2; [Exhibit A](#); [Exhibit B](#); [Exhibit C](#); [Exhibit D](#); [Exhibit E](#); [Exhibit F](#); [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).

<sup>10</sup> 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

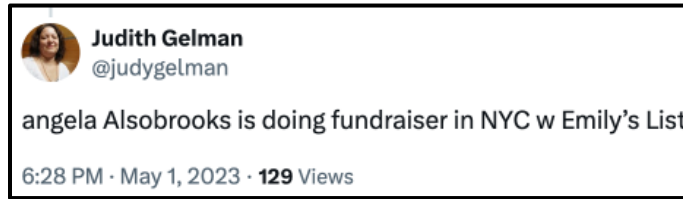
The foregoing instrument was subscribed and sworn to before me this 12th day of June 2024 by Caitlin Sutherland.

\_\_\_\_\_  
Notary Public

Notary registration number: \_\_\_\_\_

My commission expires: \_\_\_\_\_

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**

Please join us for a Reception hosted by: Steve & Dianne Proctor

**Premier Host Committee:**  
Brandon Bellamy, Michael Chiaramonte, Greg Deweese, Omar Karim, Ronald Lipscomb [Host Committee in Formation]

**Co-Host Committee:**  
Garth Beale, Joan Branch, Deante Chisley, Sue Greer, Marianne Harnes, Darrell Lanier, Ed Lewis, Hammad Maleen, Charles McPherson, Stephen Michaels, Kyle Murray, Matt Tedesco [Co-Host Committee in Formation]

for a reception in support of  
**Angela Alsobrooks**  
Prince George's County Executive  
Democratic Candidate for U.S. Senate in Maryland

Saturday, June 17, 2023  
4:00 PM Host Reception  
5:00 Guest Reception

Location provided upon RSVP

To mail a contribution, please send to:  
Angela Alsobrooks for Senate  
PO Box 6058  
Largo, MD 20792

Please contact Rachael Rice with any questions  
rachaelrice@riceconsultingllc.com | 410-838-6365

**1) Tickets** 2) Details 3) Payment

Select your tickets below:

Host	6,600.00 each	0
Co-Host	3,300.00 each	0
Guest	2,000.00 each	0

Additional contribution  
Can't attend? Make a contribution instead! \$ 0.00

**Total due today \$0.00**  
Your contribution will benefit Angela Alsobrooks.

**Checkout**  
Have an ActBlue Express account? [Sign in to give faster.](#)

Pay with card  
PayPal  
Pay  
venmo

**Contribution rules**

1. I am a U.S. citizen or lawfully admitted permanent resident (i.e., green card holder).
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 eighteen years old.
4. I am not a federal contractor.
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

**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 C

**ANGELA ALSOBROOKS FOR U.S. SENATE**

### Join us June 24th in support of Angela Alsobrooks for Senate

Please join Justin Ross, Michael Errico, Brad Frome, Abigail Ross Hopper, Jim Soltesz for a Reception in support of **Angela Alsobrooks** Prince George's County Executive Democratic Candidate for U.S. Senate in Maryland

**Saturday, June 24, 2023**  
4:00-5:30 PM

**Riverdale Park, Maryland**  
Address provided upon RSVP

To mail a contribution, please send to:  
Angela Alsobrooks for Senate  
PO Box 6058  
Largo, MD 20792

Please contact Rachael Rice with any questions  
rachaelrice@riceconsultingllc.com | 410-838-6355

1) Tickets 2) Details 3) Payment

Select your tickets below.

Host	3,300.00 each	0
Co-Host	1,000.00 each	0
Guest	500.00 each	0
Friend	250.00 each	0

**Additional contribution**  
Can't attend? Make a contribution instead! \$ 0.00

**Total due today \$0.00**  
Your contribution will benefit Angela Alsobrooks.

**Checkout**  
Have an ActBlue Express account? [Sign in to give faster.](#)

Pay with card  
Or  
PayPal  
Venmo

**Contribution rules**

1. I am a U.S. citizen or lawfully admitted permanent resident (i.e., green card holder).
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 eighteen years old.
4. I am not a federal contractor.
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.

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Angela Alsobrooks for U.S. Senate, Join Us June 24th in Support of Angela Alsobrooks for Senate, [Angela Alsobrooks for U.S. Senate-ActBlue](https://actblue.com) (June 24, 2023)

EXHIBIT D

# ANGELA ALSOBROOKS FOR U.S. SENATE

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

Please join  
Juan Gray  
[Host Committee in Formation]

for a Reception in support of

**Angela Alsobrooks**  
Prince George's County Executive  
Democratic Candidate for U.S. Senate in Maryland

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

Clinton, Maryland  
Address provided upon RSVP

To mail a contribution, please send to:  
Angela Alsobrooks for Senate  
PO Box 6058  
Largo, MD 20792

Please contact Rachael Rice with any questions  
rachaelrice@riceconsultingllc.com | 410-838-6355

1) Tickets2) Details3) Payment

Select your tickets below.

Host	3,300.00 each	0
Co-Host	1,000.00 each	0
Friend	500.00 each	0

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

\$ 0.00

**Total due today** **\$0.00**

Your contribution will benefit Angela Alsobrooks.

**Checkout**

Have an ActBlue Express account? [Sign in to give faster.](#)

Pay with card

Or

PayPal

G Pay

venmo

**Contribution rules**

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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.

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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 Gibbs, Tom Graham, Gary Michael, and  
Steve Proctor  
[Host Committee in Formation]

*for a reception in support of*

**Angela Alsobrooks**  
*Prince George's County Executive*  
*Democratic Candidate for U.S. Senate in Maryland*  
with special guests  
Comptroller Brooke Lierman  
State Treasurer Dereck E. Davis

**Wednesday, June 28, 2023**  
**6:30-7:00 PM Host Reception**  
**7:00-8:30 Friends Reception**

**Upper Marlboro, Maryland**  
*Location provided upon RSVP*

To mail a contribution, please send to:  
Angela Alsobrooks for Senate  
PO Box 6058  
Largo, MD 20792

Please contact Rachael Rice with any questions  
rachaelrice@riceconsultingllc.com | 410-838-6355

1) Tickets    2) Details    3) Payment

Select your tickets below.

Host	6,600.00 each	<input type="text" value="0"/>
Co-Host	3,300.00 each	<input type="text" value="0"/>
Friend	1,000.00 each	<input type="text" value="0"/>
Guest	500.00 each	<input type="text" value="0"/>

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

**Total due today** **\$0.00**

Your contribution will benefit Angela Alsobrooks.

**Checkout**

Have an ActBlue Express account? [Sign in to give faster.](#)

Or

**Contribution rules**

1. I am a U.S. citizen or lawfully admitted permanent resident (i.e., green card holder).
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.
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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 F

### Join us June 29th in support of Angela Alsobrooks for Senate

*Please join*  
Bruce Bates, Willie Goode, Manervia Riddick,  
Cedric Nash, Husein Sharaf, and Vennard Wright  
[Host Committee in Formation]

for a *Breaking Barriers Reception* in support of

**Angela Alsobrooks**  
Prince George's County Executive  
Democratic Candidate for U.S. Senate in Maryland

with Special Guests  
**Hon. Calvin Hawkins**  
**Hon. Gloria Lawiah**

Thursday, June 29, 2023  
6:00-8:00 PM

To mail a contribution, please send to:  
Angela Alsobrooks for Senate  
PO Box 6058  
Largo, MD 20792

Please contact Rachael Rice with any questions  
rachaelrice@riceconsultingllc.com | 410-838-6355

1) Tickets    2) Details    3) Payment

Select your tickets below.

Host	6,000.00 each	0 ▾
Gold Sponsor	3,000.00 each	0 ▾
Silver Sponsor	2,000.00 each	0 ▾
Bronze Sponsor	1,000.00 each	0 ▾
Supporter	500.00 each	0 ▾

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

\$ 0.00

**Total due today** **\$0.00**

Your contribution will benefit Angela Alsobrooks.

**Checkout**

Have an ActBlue Express account? [Sign in to give faster.](#)

Pay with card

Or

**Contribution rules**

1. I am a U.S. citizen or lawfully admitted permanent resident (i.e., green card holder).
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 eighteen years old.
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Angela Alsobrooks for U.S. Senate, Join Us June 29th in Support of Angela Alsobrooks for Senate, [Angela Alsobrooks for U.S. Senate-ActBlue](#) (June 29, 2023)

EXHIBIT G

<p>Please join us for a Reception hosted by Steve &amp; Diane Proctor in support of Angela Alsobrooks, Prince George's County Executive &amp; 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><a href="#">Click here for more information and to RSVP</a></p>
<p>Please join us for a Reception hosted by Justin Ross in support of Angela Alsobrooks, Prince George's County Executive &amp; 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><a href="#">Click here for more information and to RSVP</a></p>
<p>Please join us for a Reception in support of Angela Alsobrooks, Prince George's County Executive &amp; 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><a href="#">Click here for more information and to RSVP</a></p>
<p>Please join us for a Reception hosted by Tom Graham in support of Angela Alsobrooks, Prince George's County Executive &amp; 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><a href="#">Click here for more information and to RSVP</a></p>
<p>Please join us for a Reception hosted by Manervia Riddick in support of Angela Alsobrooks, Prince George's County Executive &amp; 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><a href="#">Click here for more information and to RSVP</a></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)