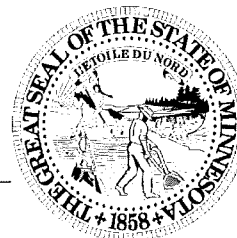


Campaign Finance & Public Disclosure Board

190 Centennial Office Building, 658 Cedar St, St Paul, MN 55155 www.cfboard.state.mn.us



Complaint for Violation of the Campaign Finance and Public Disclosure Act

All information on this form is confidential until a decision is issued by the Board.
A photocopy of the entire complaint, however, will be sent to the respondent.

Information about complaint filer

Name of complaint filer	Steve Drazkowski		
Address	1646 Cherry St. E.	Email address	rep.steve.drazkowski@house.mn
City, state, and zip	Mazeppa, MN 55956	Telephone (Daytime)	651-564-0638

Identify person/entity you are complaining about

Name of person/entity being complained about	Neighbors for Ilhan (Omar)
Address	P.O. Box 13415
City, state, zip	Minneapolis, MN 55414
Title of respondent (If applicable)	Representative
Board/Department/Agency/District # (If legislator)	60B

Signature of person filing complaint

10/8/2018

Date

Send completed form to:

Campaign Finance & Public Disclosure Board
190 Centennial Office Building
658 Cedar Street
St. Paul, MN 55155

If you have questions:

Call 651-539-1190, 800-657-3889, or for TTY/TDD communication contact us through the Minnesota Relay Service at 800-627-3529. Board staff may also be reached by email at cf.board@state.mn.us.

This document is available in alternative formats to individuals with disabilities by calling 651-539-1180, 800-657-3889, or through the Minnesota Relay Service at 800-627-3529.

Give the statutory cite to the section of Chapter 10A, Chapter 211B, or Minnesota Rules you believe has been violated:

Chapter 211B.12

You will find the complete text of Chapter 10A, Chapter 211B, and Minnesota Rules chapters 4501 - 4525 on the Board's website at www.cfboard.state.mn.us.

Nature of complaint

Explain in detail why you believe the respondent has violated the campaign finance and public disclosure laws. Attach an extra sheet of paper if necessary. Attach any documents, materials, minutes, resolutions, or other evidence to support your allegations.

The state House campaign committee for Rep. Ihan Omar continues as active. In its 2017 year-end filing, the committee lists a number of travel-related campaign and noncampaign disbursements. As discussed in this Complaint, several of these disbursements appear to fall outside of allowable campaign committee expenditures under state law.

The 2017 Committee report includes a campaign expenditure in the amount of \$337.40 on August 19 to Delta Air Lines for "Airfare / Public Transportation to Boston to speak at rally". An Internet search reveals that Rep. Omar spoke in Boston on that date at a rally for Boston City Council District 7 candidate Deejo Jibril (see Attachment A).

Minnesota Statutes 10A.01, Subd. 9 defines as a campaign expenditure one "...made or incurred for the purpose of influencing the nomination or election of a candidate...". Subd. 10 defines a candidate as an individual who "...has taken the action necessary under the law of this state to qualify for nomination or election...". A search of the MN Campaign Finance Board website reveals no Minnesota candidate by the name Deejo Jibril. The Committee's expenditure of Minnesota campaign funds to assist the candidacy of a Massachusetts city council candidate is not permitted under Minnesota law.

There are a number of travel-related noncampaign disbursements listed in the Committee's 2017 year-end report. Minnesota Statutes 10A.01 Subd. 26 lists 23 allowed noncampaign expenditure items. Minnesota Rules 4502.0900 lists an additional six allowed items.

The Board's current Candidate Handbook includes the following discussion of travel-related noncampaign expenditures, "The cost of attending...an out-of-state conference could also fall under this noncampaign disbursement category if the candidate would not attend the event if he or she were not an officeholder and the reason the candidate attends the event is to assist the candidate in performing his or her legislative duties. Trips that are for general fact-finding and relationship building, such as meeting with the state's congressional delegation in Washington, D.C., are not reasonable costs of serving in office that may be paid for with campaign committee funds."

The Committee's year-end 2017 report includes a total of \$581.43 to the Hilton Garden Inn, Washington DC, for "Girl Empowerment conference". This item appears to reference the July 2017 Girl Up Leadership Summit. As shown in this YouTube video (<https://www.youtube.com/watch?v=wOf4WGUF2wc>) Rep. Omar served as a Summit speaker, and the only elected official among the named speakers. The event appears to bear no relation to Rep. Omar's performance of her duties as a legislator.

The 2017 report includes an item in the amount of \$232.20 for Delta Air Lines for "speaking at National Immigrant (sic) Justice Center-Chicago." The item appears to refer to a June 2017 event where Rep. Omar provided a keynote speech and received an award from this organization (see Attachment B). This appearance does not fit the definition of assisting the candidate with her legislative duties.

The 2017 report includes an item for \$207 for Spirit Airlines for "return from Somali New Arrival conference." The item does not include any information on location or how the event helped assist the candidate in performing her legislative duties.

Finally, in the 2017 report there are expenses totaling \$1,700.80 for Delta Air Lines, Estair OU Tallinn, and KLM Royal Dutch Airlines for attending the September 2017 European Young Leaders Seminar in Tallinn, Estonia. Minnesota borders neither Estonia nor any other European country. Nor does the state legislature address any foreign policy or issues involving international relations. This item appears to fall squarely under "general fact-finding and relationship building."

Minnesota Statutes 211B.12 Subd. 7 (last sentence) states, "Money collected for political purposes and assets of a political committee or political fund may not be converted to personal use." It appears that Rep. Omar personally benefited from the payment of certain travel costs by her principal campaign committee, in violation of state law.

Minnesota Statutes section 10A.022, subdivision 3, describes the procedures required for investigating complaints. A full description of the complaint process is available on the Board's website.

Briefly, the Board will notify you when it has received your complaint. The Board must send a copy of the complaint to the respondent. Complaints and investigations are confidential. Board members and staff cannot talk about an investigation except as required to carry out the investigation or to take action in the matter. After the Board issues a decision, the record of the investigation is public.

The law requires a complaint to go through two stages before the Board can begin an investigation: a prima facie determination and a probable cause decision. If the complaint does not pass one of the stages, it must be dismissed.

The Board has 10 business days after receiving your complaint to determine whether the complaint is sufficient to allege a prima facie violation of the campaign finance laws. If the Board determines that the complaint does allege a prima facie violation, the Board has 45 days to decide whether probable cause exists to believe a violation that warrants a formal investigation has occurred. Both you and the respondent have the right to be heard on the issue of probable cause before the Board makes this decision. The Board will notify you if the complaint moves to the probable cause stage.

If the Board determines that probable cause does not exist, the Board will dismiss the complaint. If the Board determines that probable cause exists, the Board will start an investigation. The Board will send you monthly updates regarding the status of the investigation. At the end of the investigation, the Board will offer you and the respondent the opportunity to be heard before the Board makes a final decision.

In most cases, the Board will issue findings, conclusions, and an order as its decision. For a spending or contribution limits violation, the Board can enter into a conciliation agreement with the respondent instead of issuing findings, conclusions, and an order. The Board's final decision will be sent to you and posted on the Board's website.

Sign up Sign in

Attachment

A

Location: Boston metro area

Find: Eventful Title or Keyword

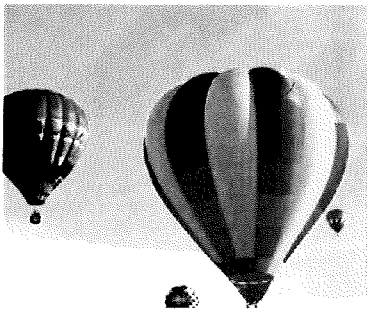
Events Movies Demand it! My Eventful

Concerts Festivals Comedy Family Nightlife Performing Arts Sports Las Vegas More

+ Add Event

HOME / BOSTON EVENTS / OTHER / UNITY RALLY FOR DEEQO JIBRIL WITH REP. ILHAN OMAR AND REP. LIZ MALIA EVENT TIME & TICKETS

Unity Rally for Deeqo Jibril with Rep. Ilhan Omar and Rep. Liz Malia in West Roxbury



Cecilia Chen - Food5i

August 19, 2017
Saturday 7:00 PM
Hibernian Hall
184 Dudley Street
West Roxbury, Massachusetts
Map

FIND TICKETS

PERFORMERS:
No Performers Listed

TOP CONCERT TICKETS

- | | |
|---------------------------------|--------------|
| 1. Drake & Migos | FIND TICKETS |
| 2. Elton John | FIND TICKETS |
| 3. Bruno Mars | FIND TICKETS |
| 4. Owl City: Cinematic Tour ... | FIND TICKETS |
| 5. Andrea Bocelli | FIND TICKETS |
| 6. Josh Turner | FIND TICKETS |
| 7. Carrie Underwood, Maddi... | FIND TICKETS |
| 8. Delbert McClinton | FIND TICKETS |
| 9. Citizen Cope | FIND TICKETS |
| 10. Jethro Tull | FIND TICKETS |

See All

EVENT DETAILS

UNITY RALLY FOR DEEQO JIBRIL WITH REP. ILHAN OMAR AND REP. LIZ MALIA

Join us Representative Ilhan Omar and Representative Liz Malia on August 19th to rally for Deeqo Jibril and her journey toward becoming District 7's next city councilor! Doors will open at 7 PM with a speaking program beginning at 8 PM. Voter registration and volunteer opportunities will also be provided. FAQs What are my transportation/parking options for getting to and from the event? There are 20 parking spots behind Hibernian Hall or street parking is available. How can I contact the organizer with any questions? Please reach out to Beata at beata@deeqojibril.com with any questions.

Categories: Other & Miscellaneous

LINKS:

Event details at eventbrite.com/

Event details may change at any time, always check with the event organizer when planning to attend this event or purchase tickets.

Report offensive content on this page



Riot Fest & Carnival

KAABOO

Austin City Limits Music Festival

SEE MORE

COMMENTS ABOUT UNITY RALLY FOR DEEQO JIBRIL WITH REP. ILHAN OMAR AND RE...

MORE EVENTS

IN BOSTON METRO AREA

NATIONAL
IMMIGRANT
JUSTICE CENTER
A HEARTLAND ALLIANCE PROGRAM
(/)



Attachment
B

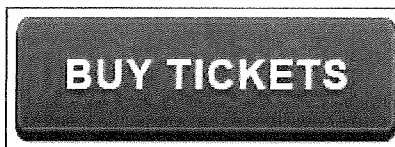
(https://org2.salsalabs.com/o/5967/p/salsa/event/common/public/?event_KEY=85442&utm_source=nijc_website&utm_medium=website&utm_campaign=hra2017)

Since 2000, the National Immigrant Justice Center's Human Rights Awards luncheon has honored human rights champions and celebrated the contributions of business, civic, and philanthropic leaders. The event draws more than 800 attendees and provides critical funding for NIJC to ensure that it can continue to promote human rights and access to justice for immigrants.

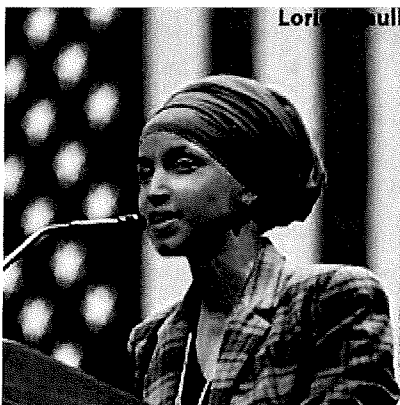
National Immigrant Justice Center Human Rights Awards

Tuesday, June 6, 2017

Fairmont Chicago Hotel



(https://org2.salsalabs.com/o/5967/p/salsa/event/common/public/?event_KEY=85442&utm_source=nijc_website&utm_medium=website&utm_campaign=hra2017)



Keynote & Jeanne And Joseph Sullivan Award:

Rep. Ilhan Omar, Minnesota Legislature

Representative Ilhan Omar is the newly elected, Minnesota House Representative for District 60B. She is the first Somali-American, Muslim woman in the nation to hold an office at this level. Ilhan and her family fled the Somali civil war and spent four years in a refugee camp in Kenya before finally arriving in the United States. Ilhan is an organizer

committed to advancing unity and justice, helping women entrepreneurs, pursuing criminal justice reform, and ensuring clean air and water. Ilhan has received multiple accolades and awards and has been featured in several news publications, including TIME, PEOPLE, NPR, and Al Jazeera. *Adapted from ilhanomar.com.*

A HEARTLAND ALLIANCE PROGRAM

(/)

Human Rights Corporate Award: Aon

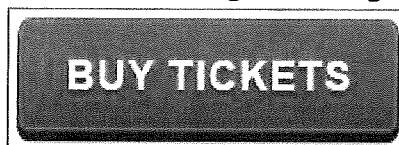
Aon's commitment to pro bono legal services to immigrants, refugees and asylum seekers has been critical to ensuring access to justice.

Human Rights Practitioner Award: Reed Smith

Reed Smith has played a tremendous role in advancing human rights for Chicago's most vulnerable, expanding resources for NIJC staff and clients, and providing protection to refugees from Central America and Syria.

Commitment To Change Award: Dr. Zaher Sahloul

Dr. Sahloul is a critical care physician who volunteers throughout Syria and whose commitment to human rights makes health care more accessible and shines a light on the global refugee crisis.



(https://org2.salsalabs.com/o/5967/p/salsa/event/common/public/?event_KEY=85442&utm_source=nijc_website&utm_medium=website&utm_campaign=hra2017)

If you or your company is interested in sponsoring the 18th Annual Human Rights Awards, please contact us (<mailto:ctapper@heartlandalliance.org>?subject=Human%20Rights%20Awards%20sponsorship%20information). For more information about sponsorships, please view NIJC's sponsorship packet (</sites/default/files/content-type/page/documents/2017-03/HRA%202017%20sponsorship%20packet%202017%2003%2006.pdf>).

(/HUMANRIGHTSAWARDS)

- 🏠 208 S. LaSalle St., Suite 1300, Chicago, IL 60604

f (<https://www.facebook.com/immigrantjustice/?fref=ts>) **🐦** (<https://twitter.com/nijc>)