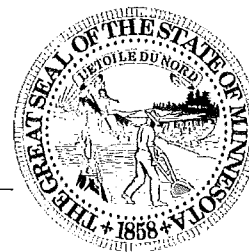


# Campaign Finance & Public Disclosure Board

190 Centennial Office Building, 658 Cedar St, St Paul, MN 55155

[www.cfboard.state.mn.us](http://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

A handwritten signature in black ink that reads "Steve Drazkowski".

Signature of person filing complaint

7/19/2018

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](mailto: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](http://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. Ilhan Omar continues as active. In its 2016 year-end filing (Amendment No. 6), the committee lists a noncampaign disbursement in the amount of \$2,250 in legal fees to the Kjellberg Law Office. The transaction date, 11/20/16, falls after the date of the general election.

The Kjellberg Law Office is engaged in the practice of family law, specializing in divorce law. See <http://www.kjellberglaw.com>. The Office's principal, Carla C. Kjellberg, served as the attorney of record in Rep. Omar's 2017 divorce case (Hennepin County Case No. 27-FA-17-3331).

The Board has previously stated in Advisory Opinions (cf. Nos. 314, 318, Summary), "Costs of civil litigation which is not related to a candidate's principal campaign committee are not the type of legal fees that may be paid as a noncampaign disbursement."

The Board has further stated (Advisory Opinion 328, Summary), "Under certain circumstances funds from a principal campaign committee may be used to pay for legal services if the services relate to the candidate's chances of election, and the candidate does not personally benefit from the services."

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 legal services 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.

**Schedule B1-NCD Noncampaign Disbursements**

**Neighbors For Ilhan (Omar)**

Reg Num 17886

Principal Campaign Committee

**Vendor: ActBlue, ActBlue**

366 Summer Street  
Somerville, MA 02144-3132

Date	Specific purpose of expenditure	Paid	Unpaid	In Kind	Total
01/06/16	: Fundraising Services	35.27	0.00	0.00	35.27
02/05/16	: Fundraising Services	33.70	0.00	0.00	33.70
03/03/16	: Fundraising Services	40.66	0.00	0.00	40.66
04/04/16	: Fundraising Services	15.82	0.00	0.00	15.82
05/05/16	: Fundraising Services	114.54	0.00	0.00	114.54
06/16/16	: Fundraising Services	24.73	0.00	0.00	24.73
07/05/16	: Fundraising Services	56.45	0.00	0.00	56.45
08/03/16	: Fundraising Services	54.02	0.00	0.00	54.02
09/06/16	: Fundraising Services	69.06	0.00	0.00	69.06
09/06/16	: Fundraising Services	54.02	0.00	0.00	54.02
10/06/16	: Fundraising Services	26.19	0.00	0.00	26.19
11/04/16	: Fundraising Services	130.88	0.00	0.00	130.88
12/05/16	: Fundraising Services	60.64	0.00	0.00	60.64
Vendor Total: ActBlue, ActBlue		715.98	0.00	0.00	715.98

**Vendor: Kjellberg Law Office, Kjellberg Law Office**

2356 University Avenue W  
#230  
St Paul, MN 55114

Date	Specific purpose of expenditure	Paid	Unpaid	In Kind	Total
11/20/16	: Legal Fees	2,250.00	0.00	0.00	2,250.00

**Vendor: SD 60 DFL, SD 60 DFL**

900 E River Terrace  
Minneapolis, MN 55414

Date	Specific purpose of expenditure	Paid	Unpaid	In Kind	Total
04/12/16	: Room Rental	250.00	0.00	0.00	250.00
04/22/16	: Convention Ad	200.00	0.00	0.00	200.00
04/29/16	: Room Deposit	100.00	0.00	0.00	100.00
Vendor Total: SD 60 DFL, SD 60 DFL		550.00	0.00	0.00	550.00

**Schedule B1-NCD Noncampaign Disbursements**

	Paid	Unpaid	Inkind	Total
<b>Total of itemized:</b>	3,515.98	0.00	0.00	3,515.98
<b>Total of non-Itemized:</b>	498.21	0.00	0.00	498.21
<b>Totals:</b>	4,014.19	0.00	0.00	4,014.19

**REGISTER OF ACTIONS**

CASE No. 27-FA-17-3331

In the Marriage of ILHAN ABDULLAHI OMAR and Ahmed Nur Said Elmi

§  
§  
§  
§  
§  
§  
§

Case Type: Dissolution with Child  
Date Filed: 05/17/2017  
Location: - Hennepin Family  
Judicial Officer: Sheehy, Kathleen D.

**PARTY INFORMATION**

<b>Petitioner</b>	<b>OMAR, ILHAN ABDULLAHI</b> Minneapolis, MN 55454	Female DOB: 10/04/1982	<b>Lead Attorneys</b> <b>CARLA C KJELLBERG</b> Retained 651-789-7799(W)
<b>Respondent</b>	<b>Elmi, Ahmed Nur Said</b>	DOB: 04/04/1985	<b>Pro Se</b>

**EVENTS & ORDERS OF THE COURT**

12/04/2017	<b>DISPOSITIONS</b> Dissolution Granted - Judgment (Judicial Officer: Sheehy, Kathleen D.)
	<b>OTHER EVENTS AND HEARINGS</b>
05/17/2017	Summons and Petition Index # 1
05/17/2017	Confidential Information Form 11.1 personal information Index # 2
05/17/2017	Certificate of Representation Index # 3
05/22/2017	Notice of Case Assignment Index # 4 (Judicial Officer: Sheehy, Kathleen D.)
05/22/2017	e-Service OMAR, ILHAN ABDULLAHI Served 05/22/2017
05/22/2017	e-Service OMAR, ILHAN ABDULLAHI Served 05/22/2017
08/10/2017	Application Index # 5
08/10/2017	Proposed Order or Document Index # 6
08/15/2017	Order-Other Index # 7 (Judicial Officer: Sheehy, Kathleen D.)
08/15/2017	e-Service OMAR, ILHAN ABDULLAHI Served 08/15/2017
08/15/2017	e-Service OMAR, ILHAN ABDULLAHI Served 08/15/2017
10/03/2017	Affidavit of Publication Index # 8
10/09/2017	Notice of Hearing Index # 9
10/09/2017	e-Service OMAR, ILHAN ABDULLAHI Served 10/09/2017
10/09/2017	e-Service OMAR, ILHAN ABDULLAHI Served 10/09/2017
11/13/2017	Affidavit of Default Index # 10
11/13/2017	Affidavit of Non-Military Status Index # 11
11/13/2017	Default Scheduling Request Index # 12
11/13/2017	Proposed Order or Document Index # 13 (Judicial Officer: Sheehy, Kathleen D.)
11/13/2017	Proposed Order or Document Index # 14 (Judicial Officer: Sheehy, Kathleen D.)
12/04/2017	Default Hearing (11:00 AM) (Judicial Officer Sheehy, Kathleen D.) Result: Held
12/04/2017	Judgment Index # 15
12/04/2017	Findings, Order, Judgment and Decree-Dissolution Index # 16 (Judicial Officer: Sheehy, Kathleen D.)
12/04/2017	e-Service OMAR, ILHAN ABDULLAHI Served 12/04/2017
12/04/2017	e-Service OMAR, ILHAN ABDULLAHI Served 12/04/2017
12/04/2017	Notice of Entry of Judgment Index # 17
12/04/2017	e-Service OMAR, ILHAN ABDULLAHI Served 12/04/2017
12/04/2017	e-Service OMAR, ILHAN ABDULLAHI Served 12/04/2017
12/04/2017	Certificate of Dissolution Index # 18 (Judicial Officer: Sheehy, Kathleen D.)
12/04/2017	e-Service OMAR, ILHAN ABDULLAHI Served 12/04/2017
12/04/2017	e-Service OMAR, ILHAN ABDULLAHI Served 12/04/2017
12/07/2017	Copy Request Index # 19

**FINANCIAL INFORMATION**

	<b>Petitioner OMAR, ILHAN ABDULLAHI</b>	
	Total Financial Assessment	430.00
	Total Payments and Credits	430.00
	Balance Due as of 07/12/2018	0.00
05/19/2017	Transaction Assessment	
05/19/2017	E-File Electronic Payment Receipt # EP27F-2017-02138	OMAR, ILHAN ABDULLAHI 404.00
12/08/2017	Transaction Assessment	(404.00)
12/08/2017	E-File Electronic Payment Receipt # EP27F-2017-05253	OMAR, ILHAN ABDULLAHI 26.00
		(26.00)