Co-Founder

Ken Boehm 1949-2018

Board of Directors

Peter Flaherty, Chairman Kurt Christensen, Vice-Chairman Michael Falcone Richard F. LaMountain David Wilkinson

Since 1991

October 17, 2019

Amendment

Office of the General Counsel Federal Election Commission 1050 First Street, NE Washington, DC 20463

RE: Matter Under Review 7639

Complainant National Legal and Policy Center (NLPC) hereby amends our Complaint filed on August 28, 2019 against Rep. Ilhan Omar, Ilhan for Congress, Kate Wittenstein (Treasurer of Ilhan Omar for Congress) Tim Mynett, and E Street Group.

In that Complaint, NLPC alleged that Respondents appear to have knowingly and willfully violated the Federal Election Campaign Act of 1971 (the Act), as amended, which requires each treasurer of a political committee to file reports of receipts and disbursements in accordance with the provisions of the Act.

From August 9, 2018 to June 30, 2019, Ilhan Omar for Congress reported disbursements totaling \$222,838.38 to E Street Group, LLC. Another \$7,000 was reported as disbursed to Tim Mynett on July 11, 2018.

Among these disbursements, Ilhan Omar for Congress reported eight disbursements to E Street Group, LLC totaling \$21,546.94 for "travel expenses." None of the eight disbursements for "travel expenses" was itemized.

Federal Election Commission regulations require that campaigns that reimburse an individual for travel exceeding \$500 must report the individual receiving the reimbursement as the payee, and report the payments aggregating over \$200 to any one vendor as memo entries on Schedule B. Each memo entry must include the name and address of the vendor, as well as the date, amount and purpose of the payment.

Federal Election Commission October 17, 2019 Page Two

Ilhan Omar for Congress did not report Tim Mynett as the payee, but reported as the payee his consulting firm, E Street Group, LLC. Nor did Ilhan for Congress report the vendors who received payments aggregating over \$200 for Respondent Mynett's travel on Schedule B.

Moreover, NLPC alleged that Respondent Mynett's travel as reported by Ilhan for Congress may have been unrelated, or only partially related, to Omar's campaign. If Ilhan for Congress reimbursed Mynett's LLC for travel so that Rep. Omar would have the benefit of Mynett's romantic companionship, the expenditures must be considered personal in nature.

Federal Election Commission regulations prohibit the use of campaign funds for personal expenses collateral to travel—either campaign or officeholder—unless personal funds are used to reimburse the committee.

Subsequent events tend to confirm NLPC's original allegations that Respondents may have knowingly and willfully violated the Act, and continue to do so.

On October 12, 2019, Ilhan Omar for Congress filed FEC Form 3, Report of Receipts and Disbursements for the period covering July 1, 2019 through September 30, 2019. The filing reports Total Operating Expenditures of \$441,638.95. Of that amount, disbursements totaling \$146,712.64 were reported on Schedule B to E Street Group, LLC, owned by Tim Mynett. See Exhibit A.

Disbursements to E Street Group, LLC totaled more than a third of total disbursements and made it the largest vendor of Omar's campaign committee.

The purposes of the disbursements are identified as "digital communications consulting," "fundraising consulting," "digital advertising" "graphic design and printing," "travel and fundraising expenses," "print advertisement," "printing," "travel expenses," "video production," and "list rental."

The purpose of disbursement for a payment to E Street Group on August 1, 2019 in the amount of \$2,823.01 is identified as "travel and fundraising expenses." Again, Omar's campaign committee failed to itemize travel expenses. A committee can reimburse a campaign traveler for travel expenses, but it must report reimbursing the campaign traveler and, if the amount exceeds \$500, provide information about the original travel vendors.

Federal Election Commission October 17, 2019 Page Three

Moreover, a disbursement can be "travel" expense or a "fundraising" expense, but it cannot be both, even if the travel was in conjunction with fundraising activities. The FEC requires more specific information in reporting travel disbursements, such as the names of airlines, hotels, etc.

Respondents either continue to willfully disregard the law, or misunderstand it.

Following the original Complaint on August 28, 2019, an attorney named David Mitrani, identified himself as counsel to Omar's campaign and E Street Group, and issued the following statement:

Our law firm serves as counsel to Ilhan for Congress, as well as to E Street Group. The complaint filed today by the National Legal and Policy Center is nothing more than a political ploy to harm Congresswoman Omar's standing—and just another example of the right wing's attempts to "throw the kitchen sink" at the Congresswoman and her allies.

Any accusation made that our clients acted to skirt the law in any way is absolutely false, and completely unfounded.

E Street Group provides multiple different services to Ilhan for Congress under an arms-length contract – fundraising, digital advertising and the like. As a part of those services, the principals of E Street Group travel around the country fundraising for the Congresswoman. There is nothing untoward about this, nor anything illegal about it – and the complaint even misstates the law on travel reimbursements (as it is not required for payments to vendors, only for payments specifically to individuals).

From this – the complaint is nothing more than blustering to attempt to create the appearance of legal jeopardy, when there is none. The parties have at all times complied with federal campaign finance law.

Please note that Mitrani claims that NLPC "even misstates the law on travel reimbursements" as he misstates the law himself.

On October 4, 2019, Representative Omar filed for divorce from her husband Ahmed Hirsi, casting doubt on her veracity in the wake of denials that she was living apart from her husband or having an affair with Tim Mynett.

Federal Election Commission October 17, 2019 Page Four

Complainant does not expect the Commission to make determinations about the personal lives of the Respondents, but we do expect an investigation of whether campaign funds were put to personal use to facilitate an affair between Omar and Mynett, the appearance of which was the gravamen of our original Complaint.

6-1MM

Chairman

Sincerely,

Complainant signs and swears before me, under penalty of perjury, that the statements and facts of this Complaint are true and correct to the best of his knowledge and belief.

Peter Flaherty

Commonwealth of Virginia
The foregoing instrument was acknowledged before me
this 18th day of Och ber , 2010

or Najwer Alusa

Notary Public

Reg. # 1720140 Com. Exp. 6-30-20

NAJWA M ALWAZIR
NOTARY PUBLIC
REGISTRATION # 7230140
COMMONWEALTH OF VIRGINIA
MY COMMISSION EXPIRES
JUNE 30, 2020

EXHIBIT A

SCHEDULE B (FEC Form 3) ITEMIZED DISBURSEMENTS

Use separate schedule(s)	FOR LINE (check onli		R:	PAGE	1003 OF	1049
for each category of the Detailed Summary Page	×	17 20a	18 20b		19a 20c	19b 21
ay not be sold or used by any	person for t	the purp	ose of s		contribu	

Any information copied from such Reports and Statements ma or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee. NAME OF COMMITTEE (In Full) Ilhan Omar for Congress Full Name (Last, First, Middle Initial) Date of Disbursement A. E Street Group LLC M (8 8 V 2019 02 Mailing Address 700 Pennsylvania Ave SE # 2050 State Zip Code City FEC Identification Number DC 20003-2493 Washington Purpose of Disbursement Digital Communications Consulting C Candidate Name Amount of Each Disbursement this Period Category/ Туре 5000.00 Disbursement For: Office Sought: House General Transaction ID: VVAW9AJKN57 Primary Senate Other (specify) \(\nblue{T}\) President Memo Item District: Full Name (Last, First, Middle Initial) Date of Disbursement E Street Group LLC 02 2019 Mailing Address 700 Pennsylvania Ave SE # 2050 Zip Code State City FEC Identification Number Washington DC 20003-2493 Purpose of Disbursement Fundraising Consulting C Candidate Name Amount of Each Disbursement this Period Category/ Type 12000.00 Office Sought: Disbursement For: House General Primary Transaction ID: VVAW9AMX7J3 Senate Other (specify) President Memo Item District: Full Name (Last, First, Middle Initial) Date of Disbursement c. E Street Group LLC 09 2019 Mailing Address 700 Pennsylvania Ave SE 07 # 2050 State Zip Code City FEC Identification Number 20003-2493 DC Washington Purpose of Disbursement Digital Advertising C Candidate Name Amount of Each Disbursement this Period Category/ Type 16550.45 Disbursement For: Office Sought: House General Primary Transaction ID: VVAW9AJKNG4 Senate Other (specify) President Memo Item District: State: SUBTOTAL of Disbursements This Page (optional)..... 33550.45 TOTAL This Period (last page this line number only).....

	1			FOR LINE NUMBER: PAGE 1004 OF 1049		
SCHEDULE B (FEC Form 3)		Use separate sche		(check only one)		
TEMIZED DISBURSEMENTS		for each category Detailed Summary		X 17 18 19a 19b 20a 20b 20c 21		
Any information copied from such Reports and Stator for commercial purposes, other than using the n	tements m	ay not be sold or underess of any polition	sed by any cal committ	person for the purpose of soliciting contributions ee to solicit contributions from such committee.		
NAME OF COMMITTEE (In Full)						
Ilhan Omar for Congress						
Full Name (Last, First, Middle Initial) A. E Street Group LLC	Date of Disbursement					
Mailing Address 700 Pennsylvania Ave SE				07 22 2019		
# 2050 City	State	Zip Code		EEC Identification Number		
Washington	DC	20003-2493		FEC Identification Number		
Purpose of Disbursement Digital Advertising				С		
Candidate Name			Category/ Type			
Office Sought: House Disburs Senate President	Primary Other (s	General		21743,37 Transaction ID: VVAW9AJKNW9 Memo Item		
State: District:						
Full Name (Last, First, Middle Initial) E Street Group LLC	Date of Disbursement					
Mailing Address 700 Pennsylvania Ave SE # 2050				07 22 2019		
City Washington	State DC	Zip Code 20003-2493		FEC Identification Number		
Purpose of Disbursement Digital Advertising				С		
Candidate Name			Category, Type			
Office Sought: House Disburs	sement For			4158,49		
: Senate President	Primary Other (s	General pecify) ▼		Transaction ID: VVAW9AJKNY5 Memo Item		
State: District:						
Full Name (Last, First, Middle Initial) c. E Street Group LLC				Date of Disbursement		
Mailing Address 700 Pennsylvania Ave SE # 2050				07 22 2019		
City	State	Zip Code		FEC Identification Number		
Washington	DC	20003-2493				
Purpose of Disbursement Digital Advertising	С					
Candidate Name	Amount of Each Disbursement this Period					
Office Sought: House Disburs Senate President	Primary Other (s	General		Transaction ID : VVAW9AJKNZ3 Memo Item		
State: District:		*				
SUBTOTAL of Disbursements This Page (options	al)			36036.17		
TOTAL This Period (last page this line number o	only)					

Image# 201910159164186184

SCHEDULE B (FEC Form 3) ITEMIZED DISBURSEMENTS

	Use separate schedule(s) for each category of the Detailed Summary Page	FOR LINE NUMBER: (check only one) X 17 18 20a 20b	PAGE 1005 OF 1049
n	nay not be sold or used by any address of any political commit	person for the purpose of sc ee to solicit contributions fro	oliciting contributions m such committee.
		Date of Dighurgoment	

Any information copied from such Reports and S or for commercial purposes, other than using the	statements may not be sold or use name and address of any polit	ised by any persical committee t	son for the purpose of soliciting contributions to solicit contributions from such committee.			
NAME OF COMMITTEE (In Full) Ilhan Omar for Congress						
Full Name (Last, First, Middle Initial) A. E Street Group LLC	Date of Disbursement					
Mailing Address 700 Pennsylvania Ave SE # 2050		07 22 2019				
City Washington	State Zip Code DC 20003-2493		FEC Identification Number			
Purpose of Disbursement Digital Advertising			С			
Candidate Name		Category/ Type	Amount of Each Disbursement this Period			
Senate President	ursement For: Primary General Other (specify) ▼		10949.01 Transaction ID : VVAW9AMX7K1 Memo Item			
State: District: Full Name (Last, First, Middle Initial)						
B. E Street Group LLC			Date of Disbursement 07 24 2019			
# 2050						
City Washington	State Zip Code		FEC Identification Number			
Purpose of Disbursement Digital Advertising						
Candidate Name		Category/ Type	Amount of Each Disbursement this Period			
Office Sought: House Disb Senate President State: District:	ursement For: Primary General Other (specify) ▼		12210.71 Transaction ID: VVAW9AJKP01 Memo Item			
Full Name (Last, First, Middle Initial)			Date of Disbursement			
c. E Street Group LLC			M M 2 M 6 2 2 3 2 2 2			
Mailing Address 700 Pennsylvania Ave SE # 2050	In a large		08 01 2019			
City Washington	State Zip Code 20003-2493		FEC Identification Number			
Purpose of Disbursement Graphic Design and Printing			C			
Candidate Name		Category/ Type	Amount of Each Disbursement this Period			
Office Sought: House Disb Senate President State: District:	oursement For: Primary General Other (specify)		2274.12 Transaction ID: VVAW9AMAV53 Memo Item			
SUBTOTAL of Disbursements This Page (opti-	onal)		▶ 25433.84			
TOTAL This Period (last page this line numbe	r only)		▶			

Image# 201910159164186185

Office Sought:

State:

House

Senate President

District:

SCHEDULE B (FEC Form 3) TEMIZED DISBURSEMENTS				Use separate scl for each categor Detailed Summan	y of the ry Page	FOR LINE NUMBER: PAGE 1006 OF 1049 (check only one) X 17
Any information co	pied from such Repor	ts and State	ements ma	ay not be sold or address of any poli	used by any itical committ	person for the purpose of soliciting contributions ee to solicit contributions from such committee.
NAME OF COM				17/21 V 17-V 18/14		
Full Name (Last L. E Street G	, First, Middle Initial) roup LLC	Date of Disbursement				
Mailing Address	700 Pennsylvania Av # 2050	e SE				08 01 2019
City Washington			State DC	Zip Code 20003-2493		FEC Identification Number
Purpose of Dist Travel and Fun	oursement draising Expenses					C
Candidate Name	е				Category Type	
Office Sought:	House Senate President District:	Disburse	Primary Other (s	: General pecify) ▼		2823.01 Transaction ID: VVAW9AMHYW6 Memo Item
E Street G	700 Pennsylvania Av	/e SE				Date of Disbursement 08 06 2019
City Washington	# 2050		State DC	Zip Code 20003-2493	4	FEC Identification Number
Purpose of Dish Digital Commu	oursement inications Consulting					C
Candidate Name					Category Type	
Office Sought:	House Senate President District:	Disburs	Primary Other (s	General		5000.00 Transaction ID: VVAW9AMAVE4 Memo Item
Full Name (Last C. E Street G	t, First, Middle Initial) iroup LLC					Date of Disbursement
	700 Pennsylvania Av # 2050	08 06 2019				
City Washington			State DC	Zip Code 20003-2493	3	FEC Identification Number
Purpose of Dis Fundraising Co					C	
Candidate Nan	10				Category Type	// Amount of Each Disbursement this Period

Disbursement For:

SUBTOTAL of Disbursements This Page (optional).....

TOTAL This Period (last page this line number only).....

Primary General
Other (specify)

Transaction ID: VVAW9AMHYM3

Memo Item

12000.00

19823.01

SCHEDULE B (FEC Form 3) ITEMIZED DISBURSEMENTS

	Use separate schedule(s) for each category of the Detailed Summary Page	FOR LINE NUMBER: (check only one) x 17 18	PAGE 1007 OF 1049
	Detailed Suffiffiary Page	20a 20I	20c 21
Statements mane and a	ay not be sold or used by any address of any political commit	person for the purpose of tee to solicit contributions f	soliciting contributions rom such committee.
		Date of Dishurseme	nt .

An	y information cor	pied from such Report	s and Stat	tements may ame and add	not be sold or u	ised by any per ical committee	son for the purpose of soliciting contributions to solicit contributions from such committee.
7	NAME OF COM					44 (gall	
\rangle	Ilhan Omar	for Congress					
		First, Middle Initial)					Data of Dishama
Α.	E Street Gr	oup LLC					Date of Disbursement
	Mailing Address	700 Pennsylvania Ave # 2050	SE				08 13 2019
	City Washington			State DC	Zip Code 20003-2493		FEC Identification Number
	Purpose of Disbi Print Advertisem	ursement nent					С
	Candidate Name					Category/ Type	Amount of Each Disbursement this Period
	Office Sought:	House Senate President	Disburs	ement For: Primary Other (spe	General Cify) ▼		856.50 Transaction ID: VVAW9AMAVJ6 Memo Item
	State:	District: First, Middle Initial)	J				
В.	E Street G						Date of Disbursement
	Mailing Address	700 Pennsylvania Ave # 2050	e SE		0.000		08 23 2019
	City			State Zip Code			FEC Identification Number
	Washington		DC	20003-2493			
	Purpose of Disb Graphic Design	ursement and Printing					C
	Candidate Name					Category/ Type	Amount of Each Disbursement this Period
	Office Sought:	House	Disburs	ement For:			749,63
		Senate President		Primary Other (spe	General vicify)		Transaction ID : VVAW9AMHYT1 Memo Item
_	State:	District:					
C.	E Street G	First, Middle Initial) roup LLC					Date of Disbursement
	Mailing Address	700 Pennsylvania Ave # 2050	e SE				08 29 2019
	City			State	Zip Code		FEC Identification Number
	Washington	ursement		DC	20003-2493		С
	Purpose of Disb Print Advertiser	nent					
	Candidate Name						Amount of Each Disbursement this Period
	Office Sought:	House Senate President District:		Transaction ID : VVAW9AMR285 Memo Item			
_	State:		ļ				L Company of the Comp
\vdash		isbursements This Pageon od (last page this line					, ,
	TOTAL This Perio	ou (last page this line	number o	ч пу)			1 1 1

	-					
SCHEDULE B (FEC Form 3)		Use separate schedule(s)		FOR LINE NUMBER: PAGE 1008 OF 1049 (check only one)		
TEMIZED DISBURSEMENTS		for each category		(check only one) x 17		
I EINITED DISBONSEMENTS		Detailed Summary		20a 20b 20c 21		
Any information copied from such Reports and Stat or for commercial purposes, other than using the n	tements m ame and a	ay not be sold or underliness of any politi	sed by any cal commit	person for the purpose of soliciting contributions tee to solicit contributions from such committee.		
NAME OF COMMITTEE (In Full)						
Ilhan Omar for Congress						
Full Name (Last, First, Middle Initial)						
A. E Street Group LLC	Date of Disbursement					
Mailing Address 700 Pennsylvania Ave SE # 2050				08 30 2019		
City	State	Zip Code		FEC Identification Number		
Washington	I DC	20003-2493		C		
Purpose of Disbursement Fundraising Consulting						
Candidate Name			Category Type			
Office Sought: House Disburs	ement For	/		12000.00		
Senate	Primary	General		Transaction ID : VVAW9AMHYR5		
President	Other (s	pecity) ▼		Memo Item		
State: District: Full Name (Last, First, Middle Initial)						
B. E Street Group LLC				Date of Disbursement		
Mailing Address 700 Pennsylvania Ave SE # 2050				08 30 2019		
City	State	Zip Code		FEC Identification Number		
Washington Purpose of Disbursement	I DC	20003-2493		⊢ c		
Digital Consulting						
Candidate Name	ndidate Name Category/ Type					
Office Sought: House Disburs Senate President	Primary Other (s	General		5000.00 Transaction ID : VVAW9AMHYS3 Memo Item		
State: District:						
Full Name (Last, First, Middle Initial) E. E Street Group LLC				Date of Disbursement		
Mailing Address 700 Pennsylvania Ave SE				09 19 2019		
# 2050 City	State	Zip Code		FEC Identification Number		
Washington	DC	20003-2493				
Purpose of Disbursement Digital Advertising	C					
Candidate Name	Amount of Each Disbursement this Period					
Office Sought: House Disburs	sement Fo	11		5000.00		
Senate	Primary	1		Transaction ID: VVAW9AMRK08		
President	Other (s	specity) 🔻		Memo Item		
State: District:						
SUBTOTAL of Disbursements This Page (options	al)					
				= 1 3		
TOTAL This Period (last page this line number o	only)			▶		

Image# 201910159164186188 PAGE 1009 OF 1049 FOR LINE NUMBER: SCHEDULE B (FEC Form 3) Use separate schedule(s) (check only one) for each category of the ITEMIZED DISBURSEMENTS X 17 19b 19a 18 Detailed Summary Page 20c 21 20b 20a Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee. NAME OF COMMITTEE (In Full) Ilhan Omar for Congress Full Name (Last, First, Middle Initial) Date of Disbursement A. E Street Group LLC TX 23 2019 Mailing Address 700 Pennsylvania Ave SE # 2050 State Zip Code City FEC Identification Number DC 20003-2493 Washington Purpose of Disbursement Printing C Candidate Name Amount of Each Disbursement this Period Category/ Type 699.63 Disbursement For: Office Sought: House General Primary Transaction ID: VVAW9AMRKE8 Senate Other (specify) \(\nblue{x}\) President Memo Item District: Full Name (Last, First, Middle Initial) E Street Group LLC Date of Disbursement 30 2019 Mailing Address 700 Pennsylvania Ave SE # 2050 State Zip Code City FEC Identification Number DC 20003-2493 Washington Purpose of Disbursement Travel Expenses C Candidate Name Amount of Each Disbursement this Period Category/ Type 348.27 House Disbursement For: Office Sought: General Transaction ID: VVAW9AMX8F2 Senate Primary Other (specify) President Memo Item District: Full Name (Last, First, Middle Initial) Date of Disbursement c. E Street Group LLC Mailing Address 700 Pennsylvania Ave SE 30 2019 # 2050 Zip Code State City FEC Identification Number 20003-2493 DC Washington Purpose of Disbursement Digital Advertising C Candidate Name Amount of Each Disbursement this Period Category/ Type 5000.00 Disbursement For:

Office Sought:

State:

House

Senate President

District:

Primary

SUBTOTAL of Disbursements This Page (optional).....

TOTAL This Period (last page this line number only).....

Other (specify)

General

6047.90

Transaction ID: VVAW9AMX8G0

Memo Item

Any information copied from such Reports and State or for commercial purposes, other than using the NAME OF COMMITTEE (In Full) Ilhan Omar for Congress	atements mand a	Use separate sche for each category Detailed Summary ay not be sold or us ddress of any politic	dule(s) (dule(s) Page	COR LINE NUMBER: Check only one) X 17 18 19a 19b 20a 20b 20c 21 21 20 20 20 21 22 23 24 20 20 20 20 20 20 20
Full Name (Last, First, Middle Initial) A. E Street Group LLC Mailing Address 700 Pennsylvania Ave SE				Date of Disbursement 09 30 2019
# 2050 City Washington Purpose of Disbursement Video Production	State DC	Zip Code 20003-2493	Category/	FEC Identification Number C Amount of Each Disbursement this Period
Office Sought: House Disbut Senate President State: District:	rsement For Primary Other (s	General specify) ▼	Type	1198.00 Transaction ID: VVAW9AN5KH5 Memo Item
Full Name (Last, First, Middle Initial) E Street Group LLC Mailing Address 700 Pennsylvania Ave SE # 2050	Date of Disbursement 09 30 2019			
City Washington Purpose of Disbursement List Rental Candidate Name	State DC ursement Fo Primary	General	Category/ Type	FEC Identification Number C Amount of Each Disbursement this Period 187.14 Transaction ID: VVAW9AN5KJ3
State: District: Full Name (Last, First, Middle Initial) C. EPG Security Group Mailing Address 2928 N 2nd St	Other (specify) ▼		Date of Disbursement 08 05 2019
City Minneapolis Purpose of Disbursement Security Services Candidate Name Office Sought: House Senate President	State MN		Category/ Type	FEC Identification Number C Amount of Each Disbursement this Period 1725.00 Transaction ID: VVAW9AMC0M0 Memo Item
State: District: SUBTOTAL of Disbursements This Page (option to the control of t				