



**Judicial
Watch**[®]
*Because no one
is above the law!*

VIA HAND DELIVERY

September 16, 2019

Chairman David Skaggs
Office of Congressional Ethics
U.S. House of Representatives
425 Third Street, SW, Suite 1110
Washington, DC 20024

**Re: Supplemental Ethics Complaint Against Rep. Ilhan Omar Concerning Possible
Violations of Federal Law or Regulations**

Dear Chairman Skaggs:

Judicial Watch is a non-profit, non-partisan educational foundation, promoting transparency, accountability and integrity in government and fidelity to the rule of law. We regularly monitor congressional ethics issues as part of our anti-corruption mission.

This letter serves as a supplemental complaint to an official complaint that we filed with the Office of Congressional Ethics (OCE) on July 22, 2019 (attached as Exhibit A), relative to potential felonies committed by Rep. Ilhan Omar involving tax fraud, marriage fraud, immigration fraud and perjury, principally involving Rep. Omar's possible marriage to her biological brother, presumably as part of an immigration fraud scheme.

In addition to those potential violations of law, new disclosures arising from civil litigation raise still more troubling allegations, suggesting more potential violations of law or regulations by Rep. Omar that require investigation.

Specifically, in a divorce action, Dr. Beth Mynett of Washington, D.C., has accused her husband, political consultant Tim Mynett, of having an affair with Rep. Omar during which Mr. Mynett's firm, E Street Consulting LLC, and Mr. Mynett directly, received nearly \$230,000 from Rep. Omar's campaign since July 2018.

According to Dr. Mynett's divorce filings, "[O]n reflection, Defendant's [Tim Mynett's] more recent travel and long work hours now appear to be more related to his affair with Rep. Omar than with his actual work commitments..."¹

¹ We enclose a copy of Dr. Mynett's divorce petition for your reference.

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The bulk of the proceeds paid to E Street (\$175,371.40) were funneled to E Street *after* the November 2018 congressional elections, thereby calling into question the true purpose of the payments.

Additionally, according to a complaint filed with the Federal Election Commission, Ilhan for Congress campaign filings with the FEC indicate that eight disbursements were made to E Street Consulting totaling \$21,546.94 for “travel expenses.” However, these expenses were not itemized, as required by FEC regulations.²

House Rules are quite specific about the improper use of campaign funds for personal expenditures. The Code of Official Conduct of the House of Representatives states:

A Member, Delegate, or Resident Commissioner—

(a) shall keep the campaign funds of such individual separate from the personal funds of such individual;

(b) may not convert campaign funds to personal use in excess of an amount representing reimbursement for legitimate and verifiable campaign expenditures; and

(c) except as provided in clause 1(b) of rule XXIV, may not expend funds from a campaign account of such individual that are not attributable to bona fide campaign or political purposes.³

The House Rules of Conduct are also quite explicit about the seriousness with which Congress takes such violations as have allegedly occurred with respect to Rep. Omar’s conduct. The very opening of Rule XXIII, the Code of Official Conduct, states:

There is hereby established by and for the House the following code of conduct, to be known as the “Code of Conduct”: 1. A Member, Delegate, Resident Commissioner, Officer, or employee of the House shall behave at all times in a manner that shall reflect creditably on the House.⁴

As suggested by Dr. Mynett’s court filings and the FEC complaint, these payments may represent campaign funds being used to allow Mr. Mynett to accompany Rep. Omar in her travels for Rep. Omar’s pleasure, and thereby constitute campaign funds being used for personal

² The FEC complaint is available at <https://www.scribd.com/document/423509144/FEC-Complaint-vs-Rep-Ilhan-Omar-Tim-Mynett>.

³ Rules of the House of Representatives, 116th Congress, Rule XXIII, Clause 6, available at <https://ethics.house.gov/publication/code-official-conduct>.

⁴ Rules of the House of Representatives, 116th Congress, Rule XXIII, Clause 1, available at <https://rules.house.gov/sites/democrats.rules.house.gov/files/116-1/116-House-Rules-Clerk.pdf>.

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expenses, in addition to the expenses not being properly itemized – both serious violations of House rules and campaign finance regulations.

We call upon the Office of Congressional Ethics to launch an investigation into Rep. Omar's conduct immediately for both these potential violations and those enumerated in our letter of July 22, 2019.

Respondent, Rep. Ilhan Omar, has been provided with an exact copy of the filed complaint and all attachments.

Thank you for your consideration of this matter.

VERIFICATION

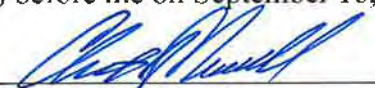
The individual submitting this information is listed below and acknowledges that section 1001 of title 18 United States Code applies to the information being provided.

Submitted by,



Thomas Fitton
President
JUDICIAL WATCH, INC.
425 Third Street SW, Suite 800
Washington, DC 20024
(202) 646-5172
tfitton@judicialwatch.org

Signed and sworn to (or affirmed) before me on September 16, 2019.


Christopher J. Farrell
Notary Public

cc: Rep. Ilhan Omar
U.S. House of Representatives
1517 Longworth House Office Building
Washington, DC 20515
Via Hand-Delivery

CHRISTOPHER J. FARRELL
NOTARY PUBLIC DISTRICT OF COLUMBIA
My Commission Expires November 14, 2019

SUPERIOR COURT OF THE DISTRICT OF COLUMBIA
DOMESTIC RELATIONS BRANCH
FAMILY COURT

BETH MYNETT)
4616 15th Street, N.W.)
Washington, D.C. 20011)
)
Plaintiff,)
)
v.)
)
TIMOTHY MYNETT)
3828 Georgia Avenue N.W.)
Washington, D.C. 20011)
)
Defendant.)

Case No. 2019 DRB 3033

CC01019R0527M1123

**COMPLAINT FOR LEGAL SEPARATION, CUSTODY, CHILD
SUPPORT, EQUITABLE DISTRIBUTION OF PROPERTY, AND
OTHER RELATED RELIEF**

Plaintiff, Beth Mynett (hereinafter "Plaintiff"), by and through her attorneys, Jonathan M. Dana, Jennifer A. Davison, and Feldesman Tucker Leifer Fidell LLP, states as follows in support of her Complaint for Legal Separation, Custody, Child Support, Equitable Distribution of Property, and Other Related Relief (hereinafter "Complaint"):

1. Plaintiff is an adult citizen of the United States who presently is and, for more than six months next preceding the filing of this Complaint, has been a *bona fide* resident of the District of Columbia, having resided at the above-captioned address since 2006.

2. Defendant is an adult citizen of the United States and is a *bona fide* resident of the District of Columbia.



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3. The Parties have been living together as a family since January 2006 and were married on June 21, 2012 in the District of Columbia.

4. The Parties have a thirteen year old son, William Mynett, born February 8, 2006. He is in the primary custody of his mother, who is a fit and proper person to have custody.

5. The parties physically separated on or about April 7, 2019 when Defendant told Plaintiff that he was romantically involved with and in love with another woman, Ilhan Omar, who serves as a U.S. Representative from Minnesota (hereafter Rep. Omar). Defendant met Rep. Omar while working for her. Although devastated by the betrayal and deceit that preceded his abrupt declaration, Plaintiff told Defendant that she loved him and was willing to fight for the marriage. Defendant, however, told her that was not an option for him. He provided no other explanation for his sudden change of heart nor had he discussed being unhappy with their marriage. Defendant then physically moved from the marital home on April 8, 2019.

6. It is clear to Plaintiff that her marriage to Defendant is over and that there is no hope of reconciliation. Accordingly, the separation is now mutual and voluntary.

7. As required by D.C. Code § 16-4602.9(a) (2006 Repl.), Plaintiff states the following:

(1) Plaintiff has not participated, as a party or witness or in any other capacity, in any other proceeding concerning the custody of or visitation with the minor child.



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(2) Plaintiff knows of no other proceeding that could affect the current proceeding, including proceedings for enforcement and proceedings relating to domestic violence, protective orders, termination of parental rights, or adoptions.

(3) Plaintiff knows of no other person not a party to this proceeding who has physical custody of the children or claims rights of legal custody or physical custody, or visitation with the minor child.

(4) Plaintiff and the minor child continue to reside in the marital residence located at 4616 15th Street, N.W., Washington, D.C. 20011. Since the Parties' separation, the minor child had spent some time with Defendant at 3828 Georgia Avenue N.W. Washington, DC 20011.

8. Plaintiff is and has always been the primary caregiver to the parties' son and is intimately involved in every aspect of their son's life. As between the parties, Plaintiff is the parent who has historically been responsible for the child's day-to-day care and for payment of and handling the vast majority of responsibilities related to his school, medical care, and extracurricular activities.

9. In contrast, Defendant's involvement with the minor child has been sporadic due to his extensive travel and long work hours (on reflection, Defendant's more recent travel and long work hours now appear to be more related to his affair with Rep. Omar than with his actual work commitments, averaging 12 days per month away from home over the past year). More recently, even when Defendant was not traveling and was home with the family, he was preoccupied and emotionally volatile.

10. Plaintiff has significant reservations about Defendant's judgment and ability to care for their son on a consistent basis. By way of example, days

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prior to Defendant's devastating and shocking declaration of love for Rep. Omar and his admission of their affair, he and Rep. Omar took the parties' son to dinner to formally meet for the first time at the family's favorite neighborhood restaurant while Plaintiff was out of town. Rep. Omar gave the parties' son a gift and the Defendant later brought her back inside the family's home. The following evening, again while Plaintiff was away, Defendant told William he was going to an event with Rep. Omar and, upon information and belief, never came home that night.

11. Defendant's lack of judgment is troubling on many levels. Most concerning is that Defendant put his son in harm's way by taking him out in public with Rep. Omar who at that time had garnered a plethora of media attention along with death threats, one rising to the level of arresting the known would be assassin that same week.

12. Defendant has a history of emotional volatility, that can cause him to become easily angered and rageful, making it difficult to live with him at times. In contrast, Defendant has described Plaintiff as "stable and trustworthy."

13. It is in the minor child's best interest to remain in his mother's primary custody and care. Plaintiff has a very close and loving relationship with her son, and she is a fit and proper person to have primary custody of William. Defendant should have reasonable access to the parties' son, taking into consideration William's safety and best interests.

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14. Plaintiff is 55 years old and is employed as the Medical Director and Health Services Administrator of the D.C. Department of Corrections. Defendant is 38 years old and is a political strategist and Partner at E Street Group Consulting, a successful political consulting firm he recently founded. Upon information and belief, Defendant's current income is comparable to Plaintiff's income, with a strong potential for much higher earnings in the very near future (2020). Defendant is well able to contribute to the support of his minor son.

15. Plaintiff has been a devoted and loving partner and wife to Defendant throughout the parties' fourteen-year relationship. She has been unwavering in her support of Defendant's career and his recent efforts to launch his business, E Street Group Consulting; Defendant recently acknowledged to others that Plaintiff has "given me everything I needed to succeed." Defendant is choosing to end the marriage at a time when he is poised to enter his highest earning years, and to abandon his wife, who is much closer to the end of her professional career and is left to face a financially insecure future as a result of Defendant's unilateral decision.

16. The Parties acquired their family home together in 2006, prior to their marriage. Plaintiff used her funds for the closing costs to purchase the home. It was also her income which paid the majority of the mortgage and maintenance and renovation costs, the latter of which Defendant has refused to fully contribute to, despite his promises to the contrary. Defendant's



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actions have created financial uncertainty for Plaintiff and she should be awarded the home, and all of the equity therein.

17. During the marriage the Parties acquired various tangible and intangible property, including bank and cash accounts, retirement assets, automobiles, furniture, furnishings, which are all marital assets subject to equitable division by this Court. Plaintiff was the primary breadwinner for the family during the majority of the Parties' years together. Plaintiff made very substantial monetary contributions to the acquisition, preservation, and appreciation in value of the Parties' estate.

18. Defendant was able to develop a successful career and high earning potential during the parties' long-term relationship. From the very beginning of their relationship until just before he left the marital home, Defendant took advantage of Plaintiff's network of professional and personal contacts to help launch and grow his career as a political consultant. His ability to pursue his professional ambitions was only possible because of Plaintiff's unconditional willingness to assume the lion's share of financial and day to day responsibilities for the parties' son and the family household (in addition to her role as the primary earner for the family).

19. Plaintiff worked arduously before filing this Complaint to try to achieve an amicable settlement with her husband. Defendant refused, and instead threatened to malign her and ruin her career if she sought assistance of the Court. In the face of the Plaintiff's difficult decision to seek assistance

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from the Court, Defendant has also begun threatening not to pay for his share of their joint financial responsibilities, conveniently asserting after their separation that he is nearly broke, and his business is floundering. Defendant's bullying tactics are disappointing, but not surprising.

20. In deciding the equities of this case, the Court should take into consideration Plaintiff's very significant non-monetary contributions to Defendant's career success and the well-being of the family unit.

WHEREFORE, Plaintiff respectfully requests that this Court:

1. Grant Plaintiff a legal separation from Defendant on the ground of a mutual and voluntary separation without cohabitation;
2. Award the Parties joint legal custody of the minor child;
3. Award Plaintiff primary physical custody of the minor child, with liberal access to Defendant;
4. Establish an access schedule in the best interest and safety of the minor child;
5. Order Defendant to contribute towards the support of the minor child in accordance with the best interests of the child and prior family experience and commensurate with the proportion of time that William is in each parent's care;
6. Award Plaintiff her sole and separate property;
7. Award Plaintiff the marital home (and take into consideration that Defendant owes Plaintiff money for agreed-to renovation costs);

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8. Identify, value, and equitably distribute the parties' marital property after full consideration of all relevant statutory factors, giving particular weight to Plaintiff's substantial contributions to the acquisition and appreciation in value of such property;

9. Award Plaintiff her reasonable attorneys' fees and costs incurred in connection with this action;

10. Grant such other and further relief as the nature of this case requires.

Respectfully submitted,



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Jennifer A. Davison, #984154
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I DO SOLEMNLY SWEAR AND AFFIRM UNDER PENALTY OF PERJURY THAT THE CONTENTS OF THE FOREGOING COMPLAINT FOR LEGAL SEPARATION, CUSTODY, CHILD SUPPORT, EQUITABLE DISTRIBUTION OF PROPERTY, AND OTHER RELATED RELIEF ARE TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE, INFORMATION, AND BELIEF.

Beth Mynett

BETH MYNETT



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EXHIBIT A



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**Re: Ethics Complaint Against Rep. Ilhan Omar Concerning Possible Violations of
Federal and State Law**

Dear Chairman Skaggs,

Judicial Watch is a non-profit, non-partisan educational foundation, promoting transparency, accountability and integrity in government and fidelity to the rule of law. We regularly monitor congressional ethics issues as part of our anti-corruption mission.

This letter serves as an official complaint with the Office of Congressional Ethics (OCE).

Substantial, compelling and, to date, unrefuted evidence has been uncovered that Rep. Ilhan Omar may have committed the following crimes in violation of both federal law and Minnesota state law: perjury, immigration fraud, marriage fraud, state and federal tax fraud, and federal student loan fraud.

Such violations would also breach the Code of Ethics for Government Service, to which all federal officeholders are subject, "Any person in Government service should uphold the Constitution, laws, and legal regulations of the United States and all governments therein and never be a party to their evasion."¹ Rep. Omar actions in this suspected immigration fraud, marriage fraud, perjurious statements on her Minnesota divorce filings, and falsifications on her tax returns, merit your immediate investigation.

In the words of investigative reporter David Steinberg: "The facts describe perhaps the most extensive spree of illegal misconduct committed by a House member in American history."²

The evidence developed against Rep. Omar was the result of a three-year long investigation in both the United States and the United Kingdom by Mr. Steinberg and his

¹ House Ethics Manual, 110th Congress, 2nd Session, page 355 (72 Stat., Part 2, B12 (1958), H. Cong. Res. 175, 85th Cong.)

² The details of the multi-year investigation by Steinberg, Samsundar and Johnson and its findings are laid out in the enclosed PowerLineBlog.com article, titled "David Steinberg: Tying Up Loose Threads in the Curious Case," published on July 18, 2019 and available this date at <https://www.powerlineblog.com/archives/2019/07/david-steinberg-tying-up-loose-threads-in-the-curious-case.php>.

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investigative reporter colleagues Preya Samsundar and Scott Johnson. It is supported by information gathered from public records, social media postings, genealogy databases, computer forensic analysis, unaltered digital photographs, discussions between the investigative reporters and the subjects of the investigation themselves, and information supplied by confidential sources within the Somali-American community.

Documented-based reporting by Steinberg, *et al.* has developed the following information: Rep. Ilhan Abdullahi Omar, a citizen of the United States, married her biological brother, Ahmed Nur Said Elmi, a citizen of the United Kingdom, in 2009, presumably as part of an immigration fraud scheme. The couple legally divorced in 2017. In the course of that divorce, Ms. Omar submitted an “Application for an Order for Service by Alternate Means” to the State of Minnesota on August 2, 2017 and claimed, among other things, that she had had no contact with Ahmed Nur Said Elmi after June 2011. She also claimed that she did not know where to find him. The evidence developed by Mr. Steinberg and his colleagues demonstrates with a high degree of certainty that Ms. Omar not only had contact with Mr. Elmi, but actually met up with him in London in 2015, which is supported by photographic evidence. Ms. Omar signed the “Application for an Order for Service by Alternate Means” under penalty of perjury. The very document that Ilham Omar signed on August 2, 2017 bears the following notation directly above her signature: “I declare under penalty of perjury that everything I have stated in this document is true and correct. Minn. Stat. § 358.116.”³

Of particular importance are archived photographs taken during a widely reported trip by Ilhan Omar to London in 2015, posted to her own Instagram account under her nickname “hameey”, in which she poses with her husband/presumed brother, Ahmed Elmi. These photographs from 2015 are documentary evidence that in fact she met up with Mr. Elmi after June 2011 and before the date she signed the divorce document in August 2017, thereby calling into question the veracity of her claim that she had not seen Mr. Elmi since June 2011.⁴

³ Minnesota Statute 358.116 states, *inter alia*, “A person who signs knowing that the document is false in any material respect is guilty of perjury under section 609.48, even if the date, county, and state of signing are omitted from the document.”

⁴ Minnesota Statute 609.48, Subdivision 1, states as follows: “Whoever makes a false material statement not believing it to be true in any of the following cases is guilty of perjury and may be sentenced as provided in subdivision 4: (2) in any writing which is required or authorized by law to be under oath or affirmation.”

Subdivision 4 stipulates: “Whoever violates this section may be sentenced as follows:

- (1) if the false statement was made upon the trial of a felony charge, or upon an application for an explosives license or use permit, to imprisonment for not more than seven years or to payment of a fine of not more than \$14,000, or both; or
- (2) in all other cases, to imprisonment for not more than five years or to payment of a fine of not more than \$10,000, or both.”

Therefore, for each of the eight false statements identified by Mr. Steinberg, et al, Rep. Omar would face a penalty of five years’ imprisonment and a \$10,000 fine, or both.

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Rep. Omar's potential crimes far exceed perjurious statements made in a Minnesota court filing.

Rep. Omar's conduct may include immigration fraud. It appears that Rep. Omar married her brother in order to assist his emigration to the United States from the United Kingdom. The same immigration fraud scheme may have aided Mr. Elmi in obtaining federally-backed student loans for his attendance at North Dakota State University. Mr. Elmi and Rep. Omar simultaneously attended North Dakota State University and may have derived illicit benefits predicated on the immigration fraud scheme.

The State of Minnesota Campaign Finance and Public Disclosure Board has already determined that Rep. Omar violated state campaign finance laws for improper use of campaign funds. She was forced to reimburse her campaign thousands of dollars. More significantly, the Board discovered that the federal tax returns submitted by Rep. Omar for 2014 and 2015 were filed as "joint" tax returns with a man who was not her husband, named Ahmed Hirsi, while she was actually married to Ahmed Elmi.⁵

Under federal law, specifically, 26 U.S. Code § 7206.1, "Any person who willfully makes and subscribes any return, statement, or other document, which contains or is verified by a written declaration that it is made under the penalties of perjury, and which he does not believe to be true and correct as to every material matter... shall be guilty of a felony and, upon conviction thereof, shall be fined not more than \$100,000 (\$500,000 in the case of a corporation), or imprisoned not more than 3 years, or both, together with the costs of prosecution."

Rep. Omar's federal tax returns must be examined to determine whether any additional falsifications were made.

Mr. Steinberg, *et al.* have engaged in meticulous research and reporting over a period of years. They have demonstrated with a high degree of probability that Rep. Ilhan Omar has violated House Ethics Rules, federal and state laws.

We call upon the Office of Congressional Ethics to launch an investigation into Rep. Omar's conduct immediately.

Sincerely,



Tom Fitton
President

⁵ The Board's entire report detailing Rep. Omar's violations may be found at https://eth.house.gov/pdf/1464_Findings.pdf?e=1559852555.