

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA

ANTON J. LAZZARO,

Plaintiff,

v.

Case No. _____

ILHAN A. OMAR,

Defendant.

COMPLAINT

For his complaint against Defendant Ilhan Omar, Plaintiff Anton J. Lazzaro alleges as follows:

Introduction

1. In 2020, Plaintiff Anton J. Lazzaro was managing a political campaign for Lacy Johnson, the Republican challenger to incumbent United States Representative Ilhan Omar in Minnesota's Fifth Congressional District.

2. During the campaign, Lazzaro spent over \$300,000 of his personal funds to investigate allegations that Omar married her brother in an immigration fraud scheme.

3. Lazzaro's investigators collected multiple DNA samples from items discarded by Omar and her husband. An independent DNA laboratory confirmed that there was a 99.9999% probability that Omar and her then-husband are biological siblings.

4. Lazzaro publicized the findings on <https://IlhanOmarDNA.com>, where he offered Omar \$1,000,000 and his red Ferrari if Omar took a 5-second DNA swab test and proved him wrong.

5. Omar denied Lazzaro's findings, but refused to take the test.

6. In addition, Omar has retaliated against Lazzaro, including by defaming Lazzaro in the national media, in which Omar has called Lazzaro a liar, among other desperaging remarks.

7. Lazzaro is not a liar. His statements are supported by the findings from a professionally-conducted private investigation and independently-verified scientific evidence.

8. Omar's defamatory statements are defamation per se, because it would be a crime for Lazzaro to knowingly falsely accuse a member of Congress of committing federal immigration and tax fraud and crimes against the State of Minnesota and report those crimes to law enforcement agencies, as Lazzaro did repeatedly.

9. Omar's defamatory statements have damaged Lazzaro; he is being cast as a liar and an Alex Jones-style "right-wing conspiracy theorist" in the national media.

10. Beyond defaming Lazzaro, Omar's retaliation has chilled Lazzaro from participating in the national political debate that has recently arisen over Omar's suitability to hold political office.

11. On December 25, 2025, for example, in a TruthSocial post, President Trump called for Omar to be "thrown out of the United States" based on Lazzaro's allegations. Lazzaro's allegations have also been covered by Fox News, The Will Cain Show, the Minnesota Star Tribune and conservative media.

12. Lazzaro would like to join the calls for Omar to be removed from office and would like to grant interviews to the many media outlets that are covering his findings.

13. Lazzaro is chilled from doing so.

14. The last time Lazzaro publicized his allegations against Omar, Lazzaro was selectively investigated for and charged with being a sex trafficker based on allegations that he engaged in consensual sex with women of the age of majority in Minnesota in his

“Sugar Daddy” lifestyle. The millions of other men in the United States who give gifts to their sexual partners have not been subject to prosecution.

15. Lazzaro is now serving a 21-year term of imprisonment after being convicted by a jury of government’s creative theory of sex trafficking during a trial in which prosecutors repeated the name “Trump” nine times.

16. Lazzaro continues to challenge his conviction, but as a person who is incarcerated, is extraordinarily vulnerable to retaliation from Omar and her team.

17. In this lawsuit, Lazzaro seeks damages based on the harm he has suffered from Omar’s defamation, a declaration that Omar and her now ex-husband, Ahmed Nur Said Elmi, are biological siblings, injunctive relief prohibiting Omar from retaliating against Lazzaro, and such other relief as the Court deems just and equitable.

Parties

18. Plaintiff Anton Lazzaro is a citizen of the State of Minnesota and lived at all times relevant to this complaint in Hennepin County, Minnesota.

19. Defendant Ilhan Omar is a United States Representative who represents in Minnesota’s Fifth Congressional District. Omar is sued in her individual capacity.

Jurisdiction and Venue

20. The Court has subject matter jurisdiction over Lazzaro’s claims for declaratory and injunctive relief pursuant to 28 U.S.C. § 1331 because they arise under the Constitution of the United States—namely, the First Amendment to the Constitution.

21. The Court has the power to issue a declaration pursuant to the Declaratory Judgment Act and the power to issue an injunction pursuant to its inherent equitable authority.

22. The Court has supplemental jurisdiction over Lazzaro's Minnesota defamation claim pursuant to 28 U.S.C. § 1367 because the claim is so related to claims within the Court's original jurisdiction that they form part of the same case or controversy under Article III of the United States Constitution.

23. Venue is proper in this district pursuant to 28 U.S.C. § 1391(b)(2) because this is the district in which a substantial part of the events or omissions giving rise to the claim occurred, or a substantial part of the property that is the subject of the action is situated.

24. The Court has supplemental jurisdiction over Lazzaro's state law defamation claim pursuant to 28 U.S.C. § 1367(a).

Allegations Common to all Claims

25. In 2020, Plaintiff Anton J. Lazzaro was managing the Congressional campaign for Lacy Johnson, the Republican candidate then challenging Representative Ilhan Omar in Minnesota's Fifth Congressional District.

26. Early in the campaign, Lazzaro received a phone call from a Somali-American Republican activist. The man asked Lazzaro why the campaign wasn't focusing on Omar's illicit marriage to her brother in an immigration fraud scheme.

27. Lazzaro was initially dismissive of the allegations, suggesting they were reminiscent of the never-proven allegations that President Barack Obama was born in Kenya and other similar "conspiracy theories."

28. The activist, however, insisted that the allegations were genuine, and a well-established fact within the Minneapolis Somali-American community.

29. Intrigued, Lazzaro had an idea. If the allegations were indeed genuine, they could easily be proven (or disproven) via publicly obtainable DNA samples from Omar and her now ex-husband, Ahmed Nur Said Elmi.

30. After transitioning from the Johnson campaign leadership to his Political Action Committee, Big Tent Republicans, Lazzaro contracted with former Federal Bureau of Investigation agents and former MI6 agents from the United Kingdom to privately investigate the allegations.

31. The investigation spanned Minneapolis, Washington D.C., London and Nairobi.

32. Collecting Omar's DNA was accomplished by the private investigative firm, Toltec Investigations, which gathered multiple samples from Omar's publicly accessible discarded trash outside of her Washington, D.C., residence.

33. Elmi's whereabouts were unknown.

34. After Lazzaro spent \$300,000, agents in the United Kingdom finally tracked Elmi to a town in England where he was temporarily residing.

35. Agents collected DNA from Elmi in accordance with the laws of the United Kingdom and samples were sent to Endeavor DNA Laboratories, a private laboratory in the United States.

3 6. Endeavor confirmed that the samples from Omar and Elmi were a 99.999% probability match of full siblingship. See Exhibit A, DNA Report Screenshot.

3 7. Throughout the investigation, Lazzaro repeatedly privately and publicly contacted federal authorities to inquire why Omar had not been investigated for the matter. For example, on October 29, 2020, at 10:44 a.m. Lazzaro sent a tweet from his Twitter handle @GOPtony to @FBIMinneapolis: "Why are you still covering up the fact that @IlhanMN married her brother? Getting pretty embarrassing!"

38. Lazzaro also contacted Representative Omar's Congressional office and campaign office, both of which denied Lazzaro's allegations.

39. Lazzaro's DNA evidence was featured in the New York Post¹, FOX News², the U.K. Daily Mail³, and several other news outlets⁴.

40. Lazzaro also publicly offered Omar \$1,000,000 and his red Ferrari if she took a five-second DNA swab test and disproved his allegations. The offer is still published on a website dedicated to Lazzaro's allegations: <https://IlhanOmarDNA.com>.

41. Omar ignored the offer⁵ and did not respond to any requests for comment from the media outlets reporting the evidence.

42. After Joe Biden won 2020 United States presidential election and Johnson was defeated by Omar, Omar's retaliatory campaign went into full swing.

43. On December 15, 2020, Lazzaro was raided by dozens of heavily armed FBI agents at his downtown Minneapolis condominium.

44. Lazzaro had no idea why dozens of armed agents were raiding him, and only suspected it had to do with the Omar investigation.

¹ <https://nypost.com/2021/08/15/fbi-dodged-ilhanomar-bro-wed-probe-devine/>

² <https://www.dailymail.co.uk/news/article-9891015/Claims-DNA-match-proves-Ilhan-Omar-married-brother.html>

³ <https://foxnews.com/video/b268538170001>

⁴ <https://yahoo.com/entertainment/tucker-guest-source-provde-ilhan-024400226.html>

⁵ Unlike Omar, who has refused to take a DNA test, the First Lady of France has brought defamation claims against Candace Owens, one of the most popular podcasters in the world. Owens has risen to prominence with allegations that Brigitte Macron is, in fact, a biological man, and Macron has offered scientific evidence to disprove the conspiracy. *Macrons to Offer Scientific Evidence to Prove Brigitte is a Woman, Lawyer Says*, <https://www.bbc.com/news/articles/ckg311j5nxdo>

45. Unbeknownst to Lazzaro, the raid was actually signed off as part of an investigation into alleged human trafficking, which was merely a pretext intended to silence Lazzaro.

46. As background, during the summer of 2020, at the peak of the COVID-19 pandemic, Lazzaro, then 29-years old, met and 18-year-old woman on a dating site. When bars and clubs were closed in Minnesota, Lazzaro and Gisela Medina became close friends along with several of her extended friend group. This included a handful of young women between the ages of 16-20, with whom Lazzaro had lawful consensual sex, as the age of consent in Minnesota and many other states is 16.

47. Lazzaro ultimately began a serious relationship with one of the young women, and Lazzaro remains in that relationship today.

48. Lazzaro showered all of the young women he met with gifts, regardless of whether he ultimately had sex with them.

49. Eight months after the December 15, 2020, raid, Lazzaro was indicted and arrested under the federal sex trafficking statute. Within minutes of his arrest, before any local media could report the story, it was leaked by the United States Attorneys' office to the left-wing news site, The Daily Beast.⁶

50. The only other individual that has ever been investigated purely under a "Sugar Daddy" theory of sex trafficking is former Republican Congressman and Attorney General nominee Matt Gaetz.

51. Lazzaro's arrest was made even more incredible by the fact that one other person had been arrested for any kind of sex trafficking in Minnesota in the two years prior to Lazzaro's arrest.

⁶ <https://thedailybeast.com/gop-strategist-anton-lazzaro-arrested-for-underage-sex-trafficking>

52. The prosecutors assigned to Lazzaro's case had strong Democratic connections. For example, one assistant United States Attorney assigned to Lazzaro's case had made donations to Democratic candidates equating to more than the collective donations of all of the other 25+ Assistant United States Attorneys in the District of Minnesota.

53. The Federal Bureau of Investigation issued multiple subpoenas directed at Lazzaro's Political Action Committee's bank accounts, website and social media accounts—an unexplainable step for an alleged “sex trafficking” investigation.

54. At trial, the name “Trump” was mentioned on nine separate occurrences.

55. Lazzaro is not requesting relief from his conviction in this complaint; rather, Lazzaro continues to challenge his conviction via proper channels. The foregoing allegations are made to demonstrate the basis of Lazzaro's chill.

56. Now, five years after the FBI raid on Lazzaro's condo, President Donald J. Trump has once again reignited the controversy surrounding Omar's marriage to her brother by highlighting the evidence of Omar's immigration and tax scheme in a series of public statements and social media posts.

57. Several outlets have reported on the matter.

58. Instead of maintaining her silence, Omar has chosen to categorically deny Lazzaro's evidence. For example, in a December 9, 2025, FOX News segment on The Will Cain Show, among others, Omar falsely stated that “Accusations that the congresswoman married her brother are absurd and offensive. This is right-wing fodder with no basis in reality. It is disgusting that the right-wing continues to spread falsehoods for clicks.”

59. In response to a December 26, 2025, Star Tribune⁷ article, Omar, referring to Lazzaro's <https://IlhanOmarDNA.com> website, stated, "I've always known that [the allegation I married my brother for immigration fraud purposes] is based on some stupid blog that was up for a couple of hours that went away and they have been in this sort of conspiracy [loop]."

60. Lazzaro's blog was indeed down at times during his incarceration.

61. In these statements, Omar has not only maintained that Lazzaro is a liar, but has labeled him a "right-wing" conspiracy theorist like Alex Jones.

62. Lazzaro is no such thing. Before being federally indicted, Lazzaro was a respected political activist operating the Big Tent Republicans PAC. The PAC focused on reaching out to minority votes, the LGBT community, women, and other groups that were not traditionally Republican supporters. The PAC expressly rejected "right-wing" politics.

63. By accusing Lazzaro of lying about her committing immigration fraud, Omar is accusing Lazzaro of committing state and federal crimes. Minn. Stat. § 609.505 criminalizes false accusations of criminal activity. Minn. Stat. § 609.765 provides a criminal remedy for defamation. Minnesota provides a civil remedy for defamation as well. At the federal level, Lazzaro would have also violated 18 U.S.C. § 1001, based on his social media activity and reports to the Minneapolis FBI office and other federal agencies.

64. Lazzaro would like to contribute to the national debate over Omar's suitability for public office in light of his evidence of Omar's participation in an immigration fraud scheme, but he is chilled from doing so by Omar.

⁷ <https://startribune.com/Ilhan-omar-defiant-donald-trump-calls-somalia-garbage/601549668>

65. The last time Lazzaro accused Omar of marrying her brother in furtherance of immigration and tax fraud schemes, he was ostensibly at Omar's direction immediately investigated by liberal members of the United States Attorney's office under a creative theory of sex trafficking, arrested and sentenced to a shocking 21-year term of imprisonment based on allegations that he gave gifts to his sexual partners, as normal people do.

66. Omar is also violating Lazzaro's rights under Minnesota's civil and criminal defamation laws.

67. Lazzaro's status as an incarcerated person increases Omar's ability to retaliate against Lazzaro. With a call from Omar's office, Lazzaro could be subjected to administrative detention, shipped across the United States, blocked from exercising his First Amendment rights to speak with the press, and subject to other deprivations of his rights.

68. Lazzaro is forced to self-censor because of his credible fear of retaliation from Omar.

69. A full report of Lazzaro's involvement with Omar is attached as Exhibit B hereto, which is incorporated as if fully set forth herein.

Count 1: First Amendment Retaliation

70. Lazzaro re-alleges all of the foregoing allegations as if set forth fully herein.

71. The First Amendment prohibits retaliation against persons on account of their exercising their rights under the First Amendment.

72. Lazzaro has a genuine fear that Omar will take adverse action against him on account of his engaging in protected political speech regarding Omar's suitability to serve as a member of the United States House of Representatives in light of her participation in immigration and tax fraud schemes.

73. Omar's retaliation would chill a person of ordinary firmness.

74. Omar's expected adverse actions are not justified by social, law enforcement or penological interests.

75. The threat of ongoing First Amendment retaliation causes ongoing and irreparable harm to Lazzaro, who has no adequate remedy at law. Absent immediate injunctive relief, Lazzaro will continue to suffer irreparable harm.

Count 2: Defamation

76. Lazzaro re-alleges all of the foregoing allegations as if set forth fully herein.

77. Omar made false statements about Lazzaro as set forth above.

78. Omar made these statements either knowing they were false or without due regard for the accuracy of the statements.

79. The statements were made with malice such that they are not entitled to a qualified privilege.

80. As a direct and proximate result of the wrongful actions of the Defendant, Lazzaro has incurred severe and permanent injuries in mind and body and Defendant has caused him to incur ongoing reputational damages which will impact his future earning capacity, enjoyment of life, and other harm in an amount exceeding \$1 million, the exact sum to be proved at trial.

Count 3: Defamation Per Se

81. Lazzaro re-alleges all of the foregoing allegations as if set forth fully herein.

82. Omar made false statements about Lazzaro as set forth above.

83. Omar made these statements either knowing they were false or without due regard for the accuracy of the statement.

84. These statements defamed Lazzaro by accusing him of committing the crimes of defamation and false statements to Government officers.

85. The statements were made with malice such that they are not entitled to a qualified privilege.

86. As a direct and proximate result of the wrongful actions of Omar, Lazzaro has incurred severe and permanent injuries in mind and body and Omar has caused him to incur ongoing reputational damages which will impact his future earning capacity, enjoyment of life, and other harm in an amount exceeding \$1 million, the exact sum to be proved at trial.

87. As a direct and proximate result of the wrongful actions of Omar, Lazzaro has incurred severe and permanent injuries in mind and body and Omar has caused him to incur ongoing reputational damages which will impact his future earning capacity, enjoyment of life, and other harm in an amount exceeding \$1 million, the exact sum to be proved at trial.

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WHEREFORE, Lazzaro prays for judgment against Defendant Ilhan Omar:

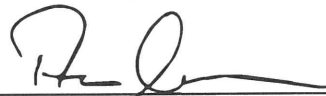
- a. Damages in an amount to be determined by a jury;
- b. A declaration that Ilhan Omar and her ex-husband, Ahmed Nur Said Elmi, are biological siblings;
- c. An injunction prohibiting Ilhan Omar, as well as her officers, agents, employees, attorneys, and all other persons in active concert or participation with her, from coercing, intimidating, threatening, interfering or retaliating against Lazzaro on account of his speech regarding Ilhan's marriage to her biological brother; and
- d. Granting such other relief as the Court may deem just and equitable.

Jury Trial Demand

Lazzaro demands a jury trial on all issues so triable.

Dated: Jan. 5, 2026

Respectfully submitted,



Anton J. Lazzaro
59637-509—K3
FCI Sandstone
P.O. Box 1000
Sandstone, MN 55072
Pro se

EXHIBIT A

DNA Siblingship Report

Informational Use Only

Lab ID	265026	Known Parent 1	Sibling 1	Sibling 2	Known Parent 2
Case ID	GGC170492US_30_5-2	Not Tested	Cigarette Butt	Straw	Not Tested
Race			Other	Other	
Sample No.			1002-41905	1002-41906	
Date of Collection			Unknown	Unknown	
STR Locus	F/N	Alleles Called	Alleles Called	Alleles Called	Alleles Called
Amelogenin			X Y	X	
D3S1358	2.554		15 16	15 16	
D1S1656	14.221		15 16.3	15 16.3	
D2S441	3.448		14 15	12 15	
D10S1248	9.843		11 14	11 16	
D13S317	1.325		12 13	11 13	
Penta E	0.250		12 14	11 15	
D16S539	1.108		11	11 12	
D18S51	7.557		15 17	15 17	
D2S1338	1.091		19 25	19 23	
CSF1PO	0.975		9 12	12	
Penta D	25.110		10 14	10 14	
TH01	0.674		7 9	6 7	
vWA	4.504		16 18	16 18	
D21S11	0.755		29 30	30 31.2	
D7S820	0.675		10 11	10 10.1	
D5S818	0.603		11 12	12 13	
TPOX	0.760		9 11	8 11	
D8S1179	2.030		15	14 15	
D19S433	10.075		14 15.2	14 15.2	
FGA	7.348		21 23	21 23	
D22S1045	4.872		11 16	11 16	

The Genetic Evidence Indicates the Tested Relationship is Supported.

Based on the analysis of STR loci listed above, the probability of full siblingship is 99.999998%. This probability is calculated by comparing to an untested, unrelated, random individual of the general population (assumes prior probability = 0.50). The positive predictive value (PPV) for two party comparisons evaluating more than 15 STR loci is greater than 99% when the likelihood ratio is greater than 10. The negative predictive value (NPV) for two party comparisons evaluating more than 15 STR loci is greater than 99% when the likelihood ratio is less than 0.1. The PPV equals the proportion of subjects correctly identified as being related. The NPV equals the proportion of subjects correctly identified as unrelated. These results do not supercede testing involving additional participants related to sibling 1 or sibling 2.

Likelihood Ratio

47,352,360

Probability of Full Siblingship versus No Relation

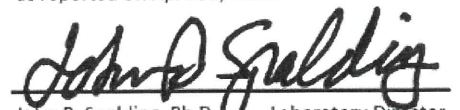
99.999998%

The First Sibling's profile obtained from Lab ID 260292. The Second Sibling's profile obtained from Lab ID 264235.

Test results are for informational purposes only. Samples were not collected under a strict chain of custody. Patient names and sample origin cannot be verified.


Daniel Slowinski DNA Analyst III

I, the undersigned Laboratory Director, verify that the interpretation of the results is correct as reported on April 29, 2021.


John B. Spalding, Ph.D. Laboratory Director

DNA amplified with PowerPlex® Fusion System, detected using the ABI PRISM® 3130xl Genetic Analyzer and analyzed with GeneMapper® ID Software. Testing performed by Endeavor DNA, Inc.

Endeavor DNA, Inc. is an A2LA and ISO/IEC 17025:2017 Accredited Laboratory, A2LA Certificate Number 4049.01. Endeavor DNA, Inc. is a body that has been accredited by the Ministry of Justice as a body that may carry out parentage tests directed by the civil courts in England and Wales under section 20 of the Family Law Reform Act 1969.

6955 N MESA ST, SUITE 109, EL PASO, TX 79912 | PHONE: 915-519-1600 | ENDEAVORDNA.COM

EXHIBIT B

FEDERAL & STATE CRIMES COMMITTED BY REP. ILHAN OMAR

INTRODUCTION

Substantial, compelling and, to date, unrefuted evidence has been uncovered that Representative Ilhan Omar committed the following crimes: marriage fraud, immigration fraud, federal student loan fraud, state and federal tax fraud, conspiracy to commit the same crimes, aiding and abetting the same crimes, and perjury.

The evidence developed against Omar is based in part of the three-year investigation in both the United States, United Kingdom, and Somalia by the *Big Tent Republicans PAC* Director, Anton J. Lazzaro. Much of the below evidence was also earlier gathered by David Steinberg, 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, information supplied by confidential sources within the Somali-American community, ***and finally conclusive and irrefutable DNA evidence (See page 30).***

David Steinberg's August 10, 2020 article details much of the evidence. [*See Ilhan Omar must resign: New evidence from nearly three dozen Somalis reveals a probable spree of felonies*](#) (last visited February 14, 2021).

This February 27, 2019 article provides additional evidence. See [Is North Dakota State University Covering Up Student Loan, Marriage, and Immigration Fraud Facilitated By Ilhan Omar And Her LGBT Brother? - Loomered](#) (last visited February 14, 2021).

This evidence is now buttressed on DNA information retrieved by private investigators, and meticulously documented below and at [IlhanOmarDNA.com](#).

The evidence confirms that Omar, a citizen of the United States, married her biological brother, Ahmed Nur Said Elmi, a citizen of the United Kingdom, in 2009, presumably to obtain fraudulent immigration status and student loans for them.

The couple legally divorced in 2017. In the course of that divorce, 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 Steinberg and his colleagues demonstrates with a high degree of certainty that Omar not only had contact with Elmi, but actually met up with him in London in 2015, which is supported by photographic evidence. 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.”

Of particular importance, are archived photographs taken during a widely reported trip by 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 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 Elmi since June 2011.

Another key piece of information is a social media picture posted by Elmi in which he states that the child he is holding (Omar’s, born in June 2012) is his “nieces” (sic).

Omar’s potential crimes far exceed perjurious statements made in a Minnesota court filing. Omar also committed immigration fraud. She married her brother in order to assist his emigration to the United States from the United Kingdom. The same immigration fraud scheme likely aided Elmi in obtaining federally-backed student loans for his attendance at North Dakota State University. Elmi and Omar simultaneously attended North Dakota State University and may

have derived illicit benefits predicated on the immigration fraud scheme, though the evidence on this particular crime is less conclusive and requires further investigation.

Steinberg and his colleagues have engaged in meticulous research and reporting over a period of years. That research, together with DNA evidence, conclusively establishes that Omar violated many federal and state laws.

FACTUAL BACKGROUND

I. Omar's Family History

A. Omar entered the United States as a member of a family different from her birth family.

In 1995, Ilhan entered the United States as a fraudulent member of the “Omar” family. The Omar family is not her birth family. Rather, the Omar family is a second, unrelated family which was being granted asylum by the United States. The Omars allowed Ilhan, her genetic sister Sahra, and her genetic father Nur Said, to use false names to apply for asylum as members of the Omar family.

Ilhan's genetic family split up at this time. The above three received asylum in the United States, while Ilhan's three other siblings — using their real names — managed to get asylum in the United Kingdom. Ilhan Abdullahi Omar's name, before applying for asylum, was Ilhan Nur Said Elmi. Her father's name before applying for asylum was Nur Said Elmi Mohamed. Her sister Sahra Noor's name before applying for asylum was Sahra Nur Said Elmi. Her three siblings who were

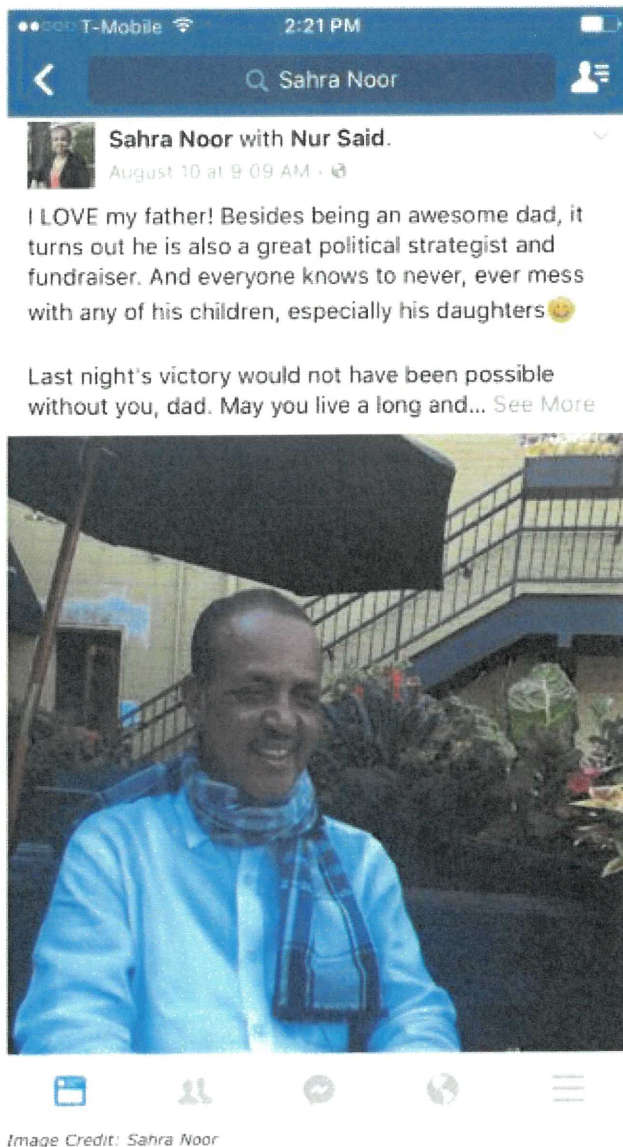
granted asylum by the United Kingdom are Leila Nur Said Elmi, Mohamed Nur Said Elmi, and Ahmed Nur Said Elmi.

B. Nur Said Elmi is Omar's father

Confirming some of the above information, as it appears on their 1995 U.S. immigration papers, is not difficult. A basic background search shows that “Nur Omar Mohamed,” “Ilhan Abdullahi Omar,” and “Sahra Noor” all received United States Social Security numbers in 1995 or 1996 in Virginia. Verified address records show adult members of the Omars living at three addresses in Arlington, Virginia at that time: 1223 South Thomas Street, 1226 South Thomas Street, and 1107 South Thomas Street.

The United Kingdom records of the relevant individuals are similarly easy to find. A simple Ancestry.com account and similar online tools reveals only one “Leila Nur Said Elmi,” only one “Mohamed Nur Said Elmi,” and only one “Ahmed Nur Said Elmi” in the UK.

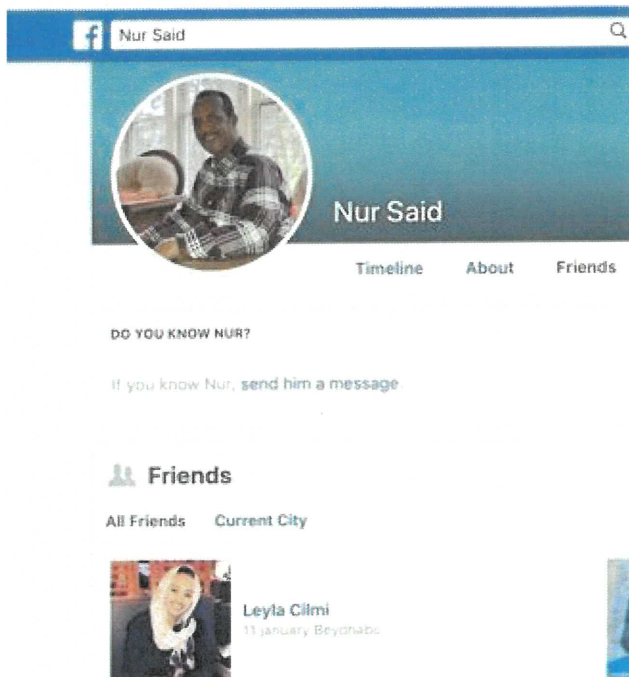
Additional evidence verifies a sibling relationship between Ilhan and Ahmed: Sahra Noor is the only person Ilhan Omar has ever publicly identified as her sister. Ilhan and Sahra have also, publicly, and often, referred to the same man as their father.



The above image, a screenshot of Sahra Noor's confirmed Facebook account, was first published by Preya Samsundar in 2016. He also identifies himself as "Nur Said."

Below is a screenshot from his Facebook account before he died:

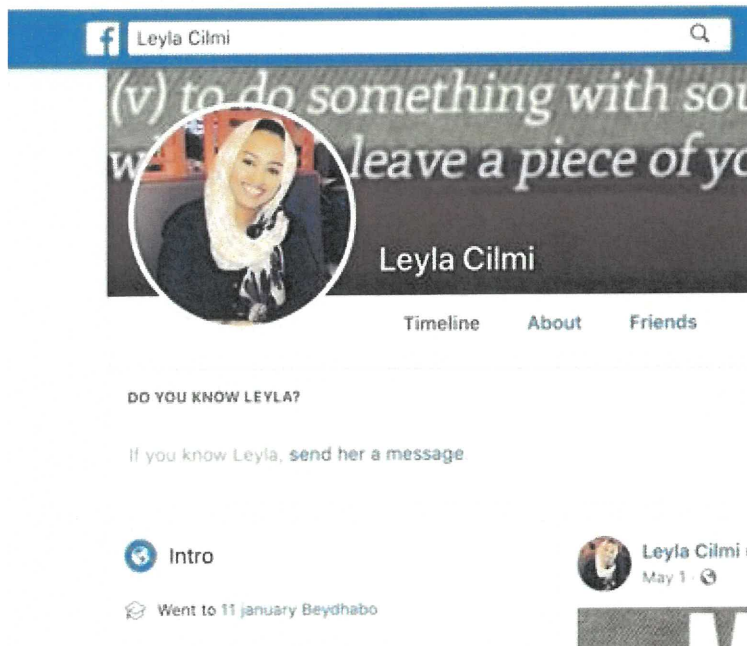
<https://www.facebook.com/nur.said.3386/friends>



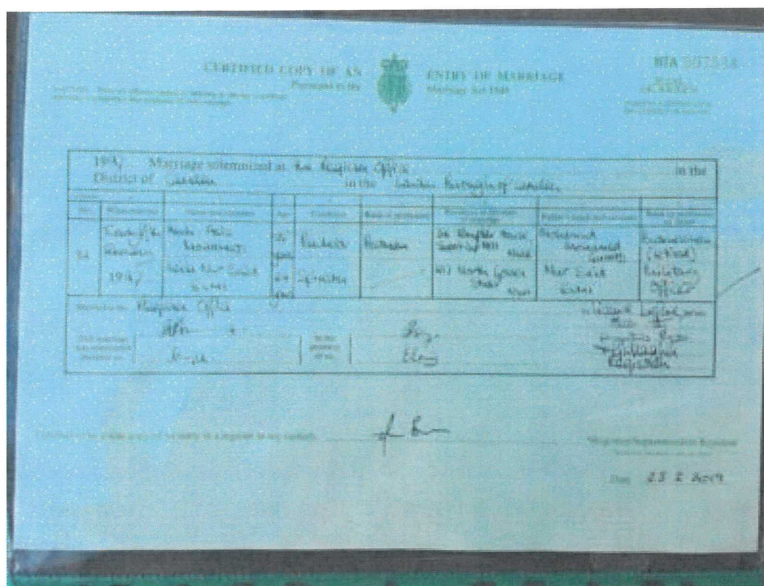
Note this thumbnail of “Leyla Cilmi,” listed as a friend of Nur Said.

In 2018, as a journalist published a series of articles investigating Omar’s past, this account name changed from “Leila Elmi” to “Leyla Cilmi.” However, the URL did not change. [It still refers to “leila.elmi”](#):

<https://www.facebook.com/leila.elmi.167>



Below is the 1997 marriage certificate for the only Leila Nur Said Elmi listed in the United Kingdom. This certified copy was retrieved from a government records center in London in February of 2019. Note the date in the document's lower right corner. This is a public record. Anyone can retrieve this document to verify its authenticity. It shows that Leila attests to her father's name being "Nur Said Elmi":



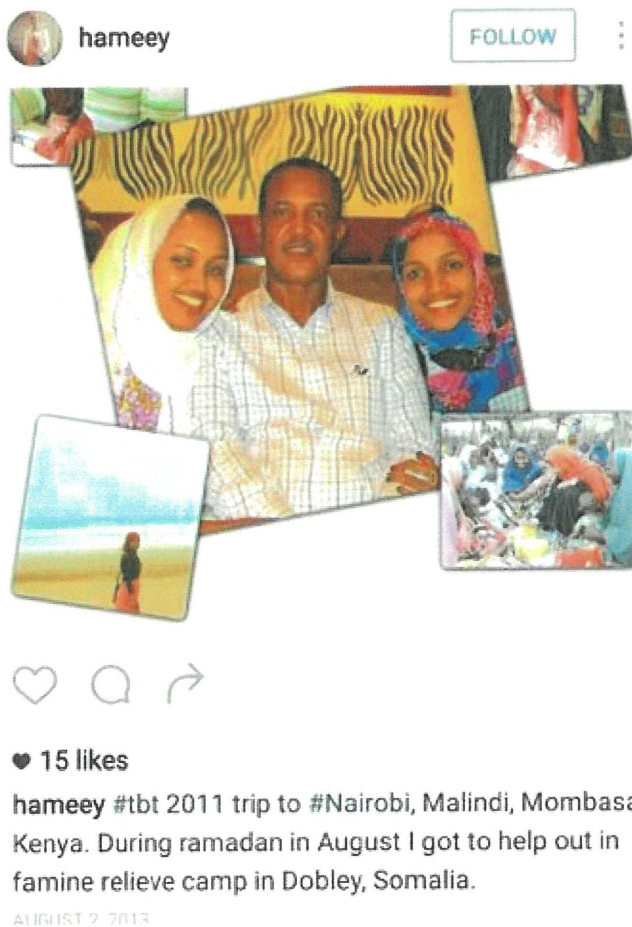
Thus, there is verifiable evidence that Ilhan Abdullahi Omar, Sahra Noor, and Leila Nur Said Elmi all refer to their father as “Nur Said” or “Nur Said Elmi.”

There is also verifiable establishing that the three are sisters and are all referring to the same man as their father.

Two posts appeared on Ilhan Omar’s confirmed Instagram account in 2013 and 2015, respectively. Instagram user “Hameey” became the blue-checked “IlhanMN” account at some point in 2016. A cursory search through older posts on the “IlhanMN” account still reveals many instances of commenters addressing “IlhanMN” as “Hameey.”

In August 2016 — after Scott Johnson and Preya Samsundar originally broke the story about Omar’s curious marriage — the below post disappeared from Omar’s Instagram account.

However, a source within the Minneapolis Somali community had downloaded much of Omar's Instagram account before posts were deleted. The source reviewed these two deleted posts, recognized their significance, and saved them.



This is a picture of Leila Elmi, Nur Said, and Ilhan Omar — together. According to Ilhan, they are pictured on an August 2011 trip to East Africa. Below is a picture of Leila Elmi in white, Ilhan in black, and Ilhan's caption in red, which reads "I heart my sisters".



Further, this picture with the #londontrip hashtag, depicts Ilhan Omar's infamous 2015 trip to the UK. This is the same trip on which was photographed with Ahmed Nur Said Elmi himself:

Photo of Ilhan and Ahmed Nur Said Elmi in London last year.



hameey Village Restaurant [Follow](#)

zaki bari @yaan21 mohamedmascud
humansofawdal ahmedwail8
abenaabraham sabreenakale
ethiopianjen and godahT3 like this

hameey Fun night with the ATM crew)
#londoning



(Photo credit: Powerline)

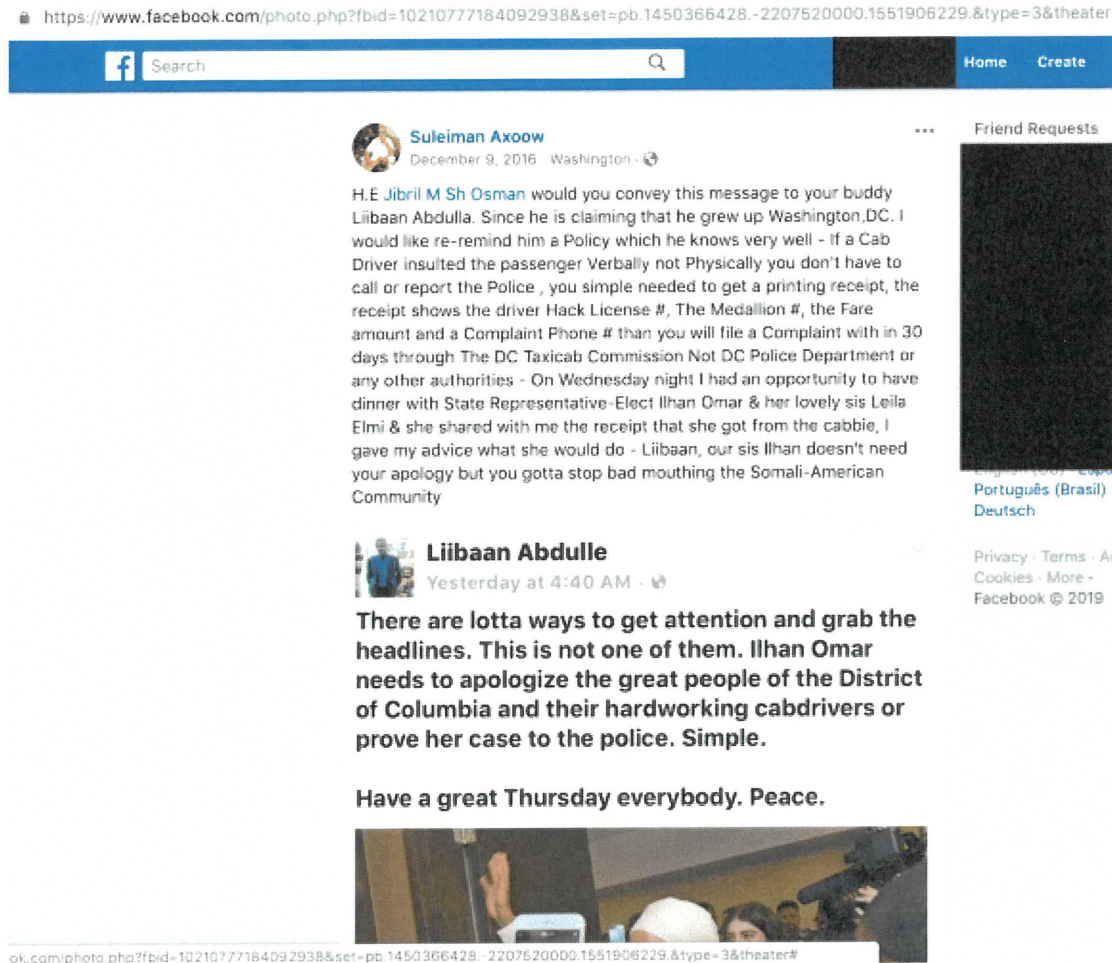
There is additional evidence establishing that Leila Elmi is Ilhan's sister.

This post is currently live and has been archived.

In December 2016, Omar reported that [she was harassed by a cab driver](#) while in Washington, D.C. attending meetings. She claimed that the cab driver called her “ISIS” and threatened to remove her hijab. A few days later, Omar [filed a report](#) with the D.C. Department of For-Hire Vehicles and the D.C. Office of Human Rights.

Omar initially stated that she was accompanied in the cab by her “sister.” A Star Tribune reporter in 2016 claimed to have a copy of her complaint, and that [it stated she had been in the cab with her sister](#)

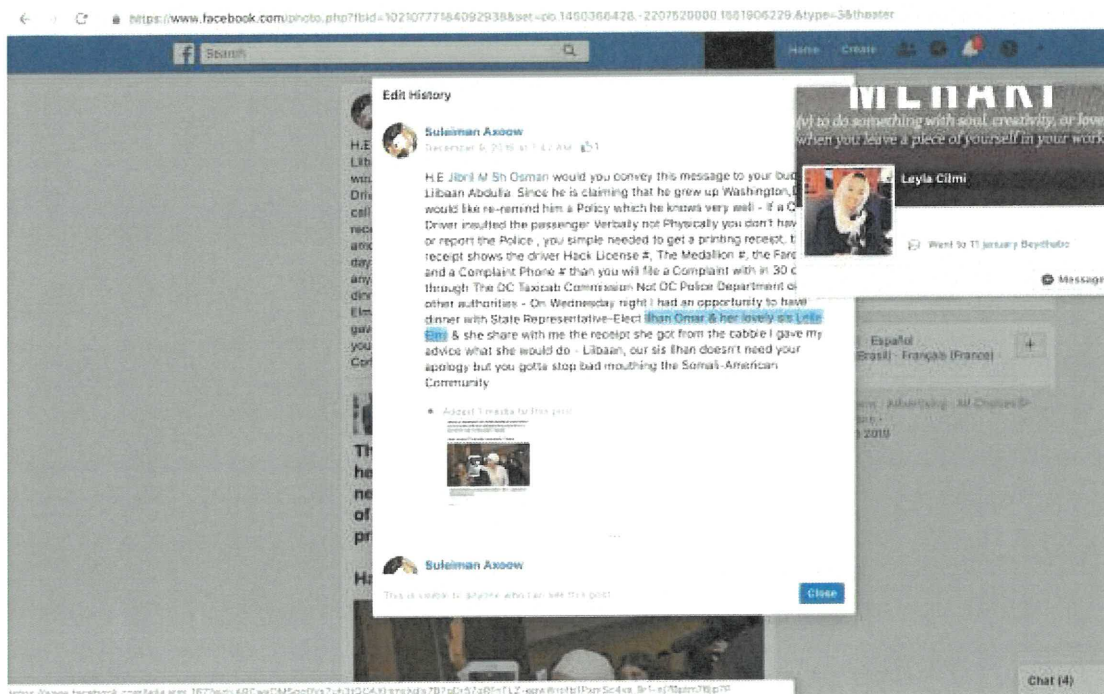
In Omar's report (obtained via FOIA request), the description of the person Omar had been in the cab with was redacted.



Suleiman Axoow, per his profile, is a frequent host of social events for the Washington, D.C. Somali-American community. On December 9, 2016, Suleiman Axoow stated that he was with Omar soon after the cab incident:

On Wednesday night I had an opportunity to have dinner with State Representative-Elect Ilhan Omar & her lovely sis Leila Elmi ...

Axoow even initially included a link to the Leila Elmi/Leyla Cilmi account:



It is not plausible to believe that Axoow simply made a mistake. One would have to believe that Axoow:

1. Had dinner with Ilhan and a second woman.
2. That the woman was introduced to him as any other person alive.
3. That a couple days later he made the 1-in-7-billion mistake of

misremembering this woman as Ilhan Omar's "lovely sis Leila Elmi." A

random name of a woman from England he has no clear reason to know.

Omar has steadfastly refused to give media the names of any of her siblings besides Sahra Noor. The only rational explanation: Leila Elmi was in the United States to visit Ilhan Omar, attended this dinner with her, and Ilhan introduced her as Axoow describes.

Therefore, there is verifiable evidence that **Ilhan Omar, Sahra Noor, and Leila Elmi** are siblings with a father named **Nur Said Elmi**.

C. Ahmed Nur Said Elmi is Leila Nur Said Elmi's brother.

Leila and Ahmed already appear to be two of the only three “Nur Said Elmis” in the United Kingdom. Leila Nur Said Elmi's marriage certificate attests that she lived in Camden, a borough of London, in 1997, and that she was 24 years old at the time.

Ahmed Nur Said Elmi was 12 in 1997. How do we know? Elmi published the following image to his self-confirmed “@AhmedNElmi” Instagram account on October 20, 2013. It depicts him undergoing a medical procedure while wearing a hospital intake bracelet. The bracelet reads: “NAME: ELMI, AHMED DOB: 04.04.1985 NHS...”.



Per his own admission, Elmi attended a school in Camden for students aged 11 to 18: Haverstock School. (See its address here; “Camden” is in the school’s URL: <https://www.haverstock.camden.sch.uk/>.)

This link was on Ahmed’s confirmed Facebook account and has been archived:

<https://www.facebook.com/ahmedn.elmi>

Facebook profile for Ahmadán Elmi. The profile picture is a circular image of a man with a beard and a blue headscarf. The cover photo is a video frame showing a woman with the text "Francine, I'm in a heavenly mood to". The name "Ahmadán Elmi" is written over the cover photo. Below the name are tabs for Timeline, About, Friends, Photos, and More. Below the tabs is a section "DO YOU KNOW AHMADÁN?" with a link "If you know Ahmadán, send him a message." Below that is an "Intro" section with a globe icon and the text "You're right. You are absolutely right." followed by a list of achievements: Editor-in-Chief / Co-Founder at The Echelon, Studied Film at Middlesex University, Studied at North Dakota State University, Went to Arlington Senior High School, Went to Haverstock School, Lives in Nairobi, Kenya, From London, United Kingdom, and Joined March 2007. To the right of the Intro section are two posts: one from July 2 at 9:07 PM showing a blue background with a white arrow, and another from July 2, 2018 showing a building with a banner that says "YOU'RE MISOGYNISTIC. YOU".

(Note that he lists his current location as “Nairobi, Kenya.” [See here for definitive evidence](#) that Ahmed has recently been working in Nairobi with — of all people — Sahra Noor.)

Additional evidence:

1. Ahmed Nur Said Elmi’s Instagram post calling two young twin girls with a backpack from a primary school in Camden his “nieces.” Omar’s Instagram account “loved” the post.
2. Omar’s Instagram post picturing herself with the same twin girls. Omar marked her location as “Camden Lock Village.” Omar also calls the girls “her nieces.” The post is yet another that is tagged #londontrip from 2015.

The twin girls are, indeed, the daughters of Leila Nur Said Elmi. This can be confirmed by anyone through posts that are currently active on Mohamed Nur Said Elmi’s Facebook account.

Thus, there is verifiable evidence that:

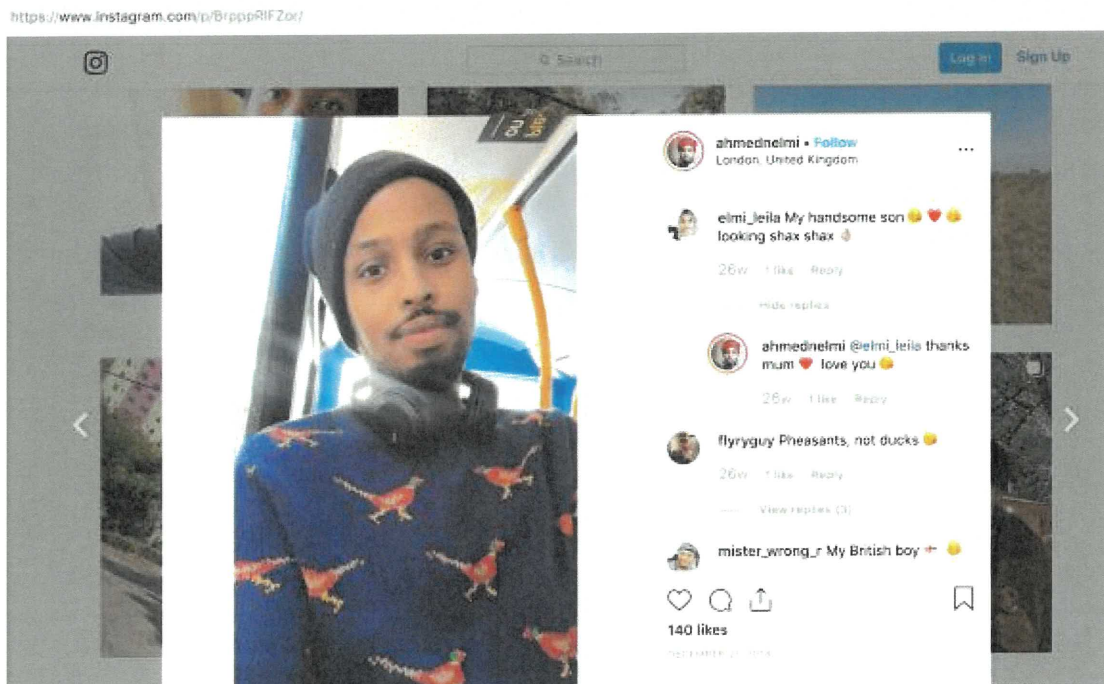
1. Sahra Noor, Ilhan Omar, and Leila Elmi are siblings with a father named Nur Said Elmi.
2. Leila Elmi and Ahmed Nur Said Elmi both lived in the same neighborhood of London and know each other.
3. Both Ilhan Omar and Ahmed Nur Said Elmi call Leila Elmi’s children “nieces.”

Ahmed Nur Said Elmi apparently arrived in the United Kingdom in 1995 or 1996, only 10 or 11 years old, without a parent. Who looked after him until he arrived in the United States in 2002? Apparently, it was **Leila**.

There is no adoption record (which can be public in the UK); it would have been a [“Kinship Care”](#) or [“Family and Friends Carer”](#) arrangement. Haverstock School has records of student Ahmed Nur Said Elmi living at the same address as Leila Elmi with her listed as his guardian.

However, these two very recent posts — currently active on Instagram and archived — already establish this.

Here are Leila and Ahmed calling each other “mum” and “son”:





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ahmednelmi • Follow
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ahmednelmi Mood.

gibbo1989x 🍌

ahmednelmi @gibbo1989x 🍌❤️

elmi_leila I love you Ahmed very happy to see you glowing keep being beautiful 🍌❤️

ahmednelmi @elmi_leila thanks mum 🍌❤️



70 likes

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Log in to like or comment



II. Omar's Marital History

A. Omar Admitted to Marrying Elmi.

On August 18, 2016, Omar released a statement confirming that she had married a British citizen named Ahmed Nur Said Elmi in 2009. Her statement also claimed that Ahmed Nur Said Elmi remained her legal husband as of that date.

She stated:

A number of baseless rumors have been made recently about my personal life and family. I will say it again here: they are absolutely false and ridiculous.

That said, I will offer clarity and share a difficult part of my personal history that I did not consider relevant in the context of a political campaign, so that we can put these rumors to rest and return to what really matters: how we

join together to build a more prosperous and equitable district and state.

In 2002, when I was 19 years old, Ahmed Hirsi (whose name before he received citizenship was Ahmed Aden), the father of my children and love of my life, and I, applied for a marriage license, but we never finalized the application and thus were never legally married. In 2008, we decided to end our relationship in our faith tradition after reaching an impasse in our life together.

I entered into a relationship with a British citizen, Ahmed Nur Said Elmi, and married him legally in 2009. Our relationship ended in 2011 and we divorced in our faith tradition. After that, he moved home to England. I have yet to legally divorce Ahmed Nur Said Elmi but am in the process of doing so.

Insinuations that Ahmed Nur Said Elmi is my brother are absurd and offensive.

Since 2011, I am happy to say that I have reconciled with Ahmed Hirsi, we have married in our faith tradition and are raising our family together. Like all families, we have had our ups and downs, but we are proud to have come through it together.

B. Omar had a child with Hirsi while “married” to Elmi

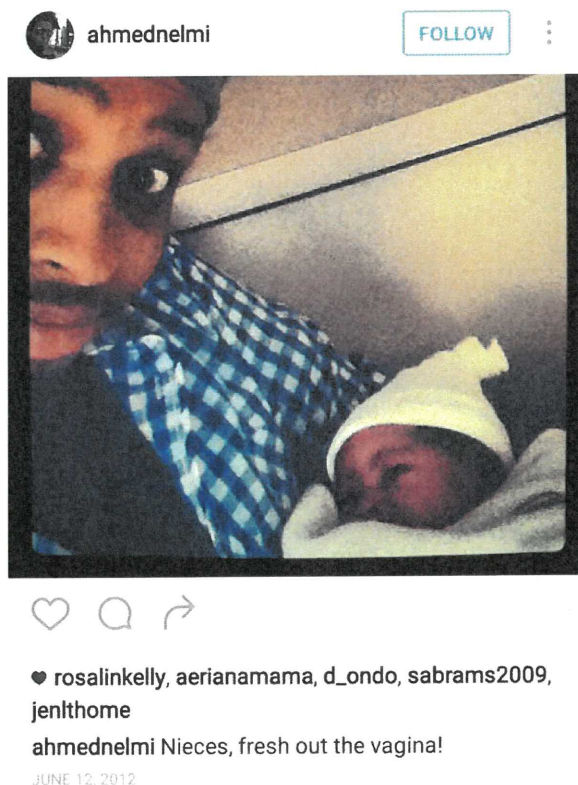
Omar’s divorce petition contains extraordinary information.

First, she attests that there are no children born “of” her marriage to Elmi, but that one of her children was born “during” that marriage. A yellow box notes that the document “has been updated since signed,” and an initialed note contains the update:

The Respondent [Ahmed Nur Said Elmi] has not signed a declaration of non-paternity as the Petitioner [Ilhan Omar] has had no contact with him since before the child was conceived.

Recall that in 2016, Omar told the press that her 2009 marriage to Elmi was essentially a two-year hiatus from her relationship with Hirsi, the legal father of all three of her children. She claimed to have separated from Hirsi, then met and married Elmi, a relationship which failed permanently sometime around June 2011, and then rekindled with Hirsi and had a third child.

Consider this Instagram post which appeared on Ahmed Nur Said Elmi's account on June 12, 2012:



That's Elmi himself, holding baby Ilwad, "fresh out of (Omar's) vagina" at the hospital. This child was born the day before to his legal wife at the time, Ilhan Omar. Who attested in court (see below) that she had had zero contact with Ahmed Elmi since before Ilwad was *conceived*, let alone born on June 12, 2012. Perhaps most significant is that Elmi refers to the newborn baby as his "nieces" (sic). His niece would obviously be **his sister's** child.

C. Omar committed perjury regarding her contact with Elmi.

On August 10, 2017, Omar swore under penalty of perjury — [literally, she signed a half-inch or so under "penalty of perjury"](#) — that she'd had zero contact with Ahmed Nur Said Elmi after June 2011.

Furthermore, Omar swore that she did not know where to find him, and that she did not know a single person who was likely to know his whereabouts. She did this to apply for a default divorce from Ahmed — a divorce where one spouse cannot be located and served.

- 1 I am the Petitioner in this action for dissolution of marriage.
- 2 The last known location of respondent as of 21.11.2011 (date) was at London
- 3 My most recent contact with respondent was (when and where) June/2011
- 4 The last known location of respondent's employment was Unknown
- 5 The names and locations of respondent's parents, siblings, children and other close relatives are as follows: Unknown
- 6 The names and locations of other person who are likely to know the respondent's whereabouts are Unknown to me

27-A-17-3331

Filed in Fourth Judicial District C
8/10/2017 4:47
Hennepin County,

7. I have made the following efforts to locate the respondent: Looked for on Social media

8. I believe that it is not likely that respondent's location will become known to me, but there is reasonable possibility that mail will be forwarded or otherwise reach respondent if addressed as follows: No known address

9. This matter does not involve minor children or real estate.

I declare under penalty of perjury that everything I have stated in this document is true and correct. Minn. Stat. § 358.116.

Dated: 8/2/2017

Signature: Elhan Omar

Omar perjured herself eight times with her nine answers. Minnesota's perjury statute allows for a sentence of up to five years — for each instance.

The above conclusions are based on:

- Verifiable UK and U.S. marriage records
- Verifiable address records
- Time-stamped, traceable, archived online communications (Convictions and settlements based upon social media evidence are commonplace, Anthony Weiner being a notable example)

- Background check confirmations of SSNs and birthdates.
- Archived court documents signed under penalty of perjury.
- Photos, which can be examined to rule out digital manipulation.
- The 2019 Minnesota Campaign Finance and Public Disclosure Board investigation, which found Omar filed illegal joint tax returns with a man who was not her husband in either 2014 or 2015.
- Three years of evidence published across many articles — none of which has been shown to be incorrect or have even been challenged with contradictory evidence from Omar or any other source.
- Perjury evidence that stands on its own — regardless of whom she married:
 - Long after June 2011, she was clearly in contact with the only man in either the U.S., or the UK, with the same name and birthdate as the man she married. She was clearly in contact with several people who were in contact with him.
 - Ahmed Nur Said Elmi admitted to being photographed with Omar in London in 2015. To be clear: Omar was legally married to an “Ahmed Nur Said Elmi” at the time she was photographed next to a man who admits his name is Ahmed Nur Said Elmi, and that he is in the photo.

- Omar has refused all inquiries from her constituents, elected officials, and media outlets, to provide any specific evidence contradicting even a single allegation suggested by three years of public information.
- In fact, Omar has responded by making information less available:
 - In August 2016, Omar’s verified social media accounts were taken offline.
 - Ahmed Nur Said Elmi’s social media accounts were also taken offline.
 - When the accounts returned, a large amount of potentially incriminating evidence had been deleted.
 - Ten additional “before and after” instances of evidence were still being deleted in 2018.
- Omar has released carefully worded statements that denigrate those seeking answers from her as racists. Yet, she has repeatedly refused to answer questions or issue anything other than public relations statements.

In fact, despite overwhelming evidence, Congresswoman Omar had been politically shielded at every turn. Below is a letter provided to her legal counsel by Andrew M. Luger, United States attorney for the district of Minnesota.



U.S. Department of Justice

United States Attorney
District of Minnesota

600 United States Courthouse
300 South Fourth Street
Minneapolis, MN 55415

Telephone: (612) 664-5600
Fax: (612) 664-5787

August 22, 2016

Jean Brandl
Brandl Law, LLC
310 Fourth Ave. S., Suite 5010
Minneapolis, MN 55415

RE: Ilhan Omar

Dear Jean:

Thank you for speaking by phone earlier today about your client, Ilhan Omar. As you are aware, an erroneous news report aired yesterday on Fox9 indicating that my office has requested an investigation into the immigration status of Ms. Omar. As I said on the telephone, there is no truth to this report and my office is not investigating, nor have we requested an investigation into Ms. Omar.

Very truly yours,

A handwritten signature in blue ink, appearing to read "A. L.", representing Andrew M. Luger.

ANDREW M. LUGER
United States Attorney

AML/tac

This type of willful blindness to Rep. Omar's many crimes has been the unfair standard to which she has benefitted from in the past, and it is almost without precedent. However, the evidence which has been compiled, is now far too strong to be ignored for political motives.

III. Ahmed Elmi is Omar's brother.

A. Official school records establish that Ahmed Elmi is Omar's brother.

According to official student enrollment records archived by St. Paul Public Schools and the state of Minnesota, an "Ahmed N. Elmi" was enrolled as a senior in the Class of 2003 at Arlington Senior High School in St. Paul, MN, from September 6, 2002, until June 10, 2003. He graduated and received a diploma.

The enrollment record states that "Ahmed N. Elmi" was born on April 4, 1985.

Both Omar's 2009 marriage documents and her 2017 divorce court pleadings state that Ahmed Nur Said Elmi was born on April 4, 1985.

An extensive search reveals no other person named "Ahmed Nur Said Elmi," "Ahmed N. Elmi," or even "Ahmed Elmi" with the birthdate April 4, 1985. The man Ilhan Omar married and the 17-18 year-old who attended Arlington Senior High School in St. Paul, MN, in 2002-2003 are one and the same.

Ahmed N. Elmi was a minor for most of the school year, and thus his parent(s)/legal guardian(s) would very likely also be listed on his enrollment records — along with his home address and telephone number.

St. Paul Public Schools has stated that federal law (FERPA) and Minnesota law forbid it from releasing the names of Ahmed N. Elmi’s parents/legal guardians, address, or phone number from his enrollment record without Elmi’s signed permission — or a warrant.

Several members of the Class of 2003 have reported that Eli “was living with his father” while attending Arlington Senior High School. Further, Elmi’s father was identified as the same man Ilhan Omar has always publicly referred to as her own father: Nur Said Elmi Mohamed.¹

¹ Read about Somali naming tradition here: <https://www.sctimes.com/story/news/local/immigration/2016/02/21/fact-check-ow-somali-names-chosen/80422864/> (last visited February 14, 2020)

B. DNA Evidence Establishes that Elmi is Omar's Brother.

Omar's personal trash items were legally obtained by Toltec Investigations (Lic. 45-3659615) at her Washington, DC residence on numerous occasions, to be then analyzed by Endeavor DNA Laboratories (MoJ & ISO 17025 Accredited).

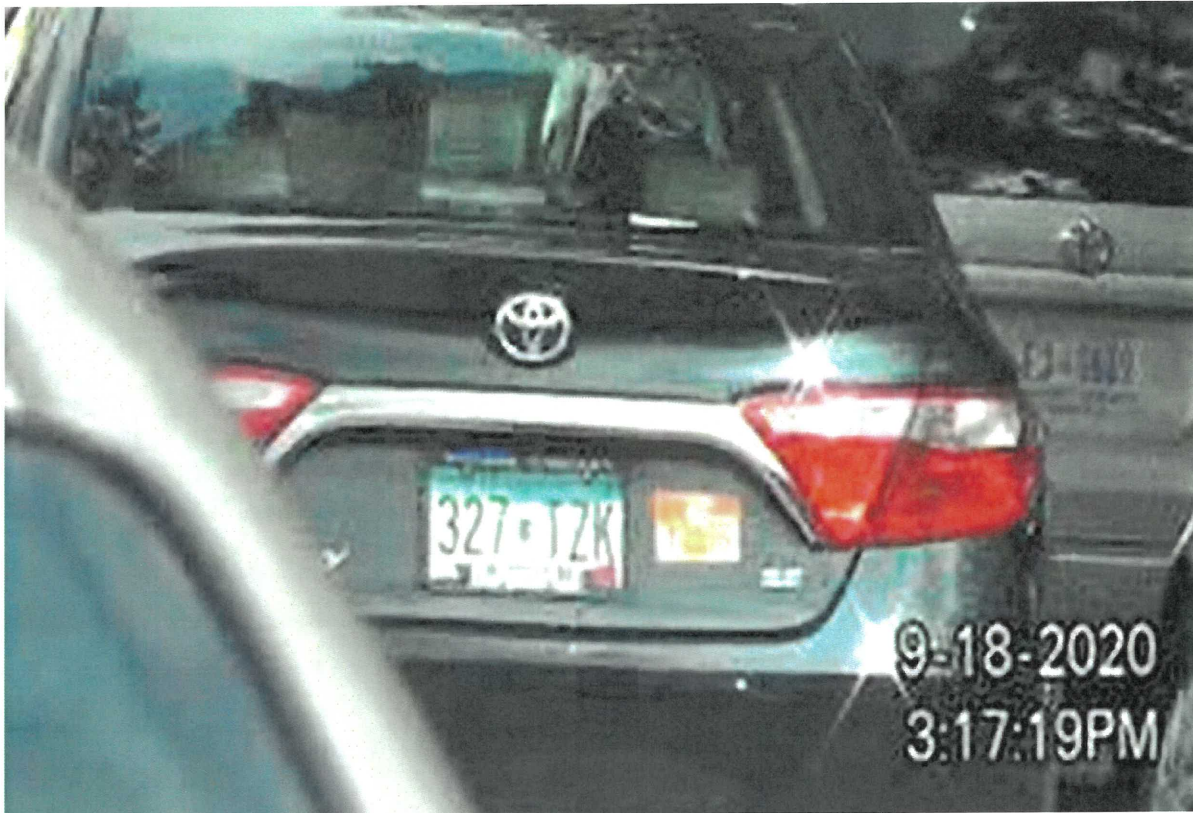
After analysis of the samples, a full DNA profile was established from several collections of waste on public property, this included Coca Cola cans, hair, and cigarette butts littered from her personal vehicle below while conducting surveillance operations over the span of several months.



Congresswoman Ilhan Omar smoking with her husband, Timothy Mynett.
(Location: Personal Residence, 1012 Rhode Island Ave NE, Washington, DC 20018).



Surveillance photos conducted in the Washington, DC area over several weeks to obtain discarded items by Congresswoman Omar. Pictured above is Rep. Omar and Timothy Mynett whom she is now married to and was at the time [having an affair with.](#)



Ilhan Omar's personal vehicle in Washington, DC – 2016 Toyota Camry, (Minnesota Lic. – 327 TZK) VIN: 4T1BFK0GU511311

The DNA recovered from the address belonged to two females of African ancestry (mother/daughter) and a Caucasian male. The mother is assumed to be Ilhan Omar as she is the only adult female who resides at this address in Washington, DC.

In the United Kingdom, investigators sought to also retrieve DNA evidence from Ahmed Nur Said Elmi, the alleged brother and ex-husband of Congresswoman Omar. Elmi is a resident of London, England. A licensed

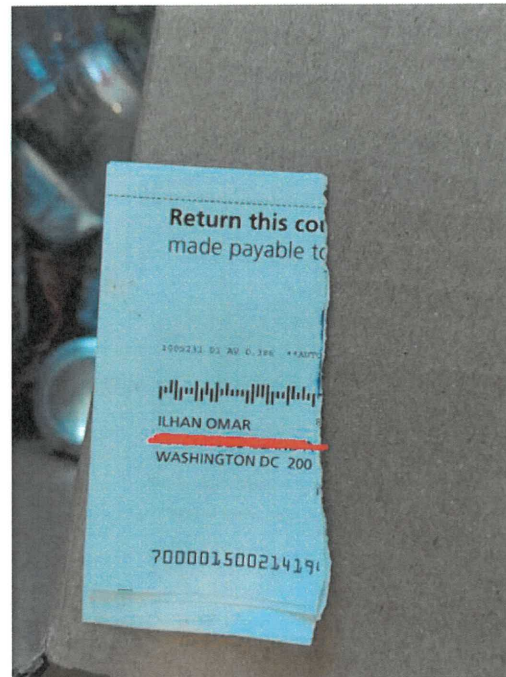
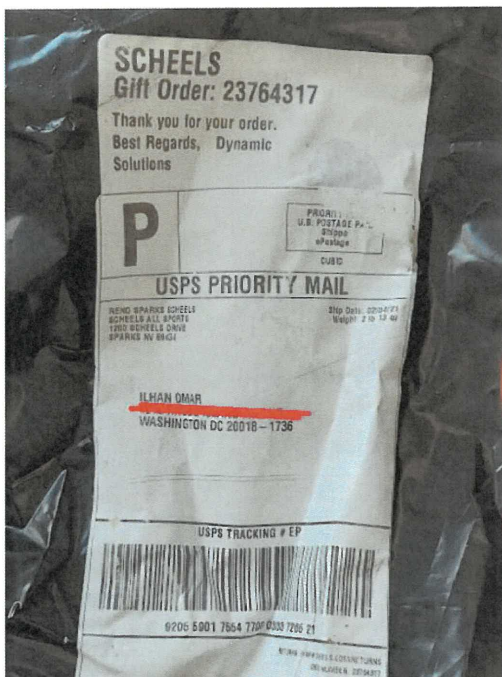
investigation firm in the UK was retained to legally collect waste for testing/analysis with Congresswoman Omar's specimens collected in Washington, DC.

Ahmed Nur Said Elmi's registered residential address is: 339 North End Road, Fulham Sw6 1NN Flat 24, Shipton House, Prince of Wales Road London NW 3ND, UK.

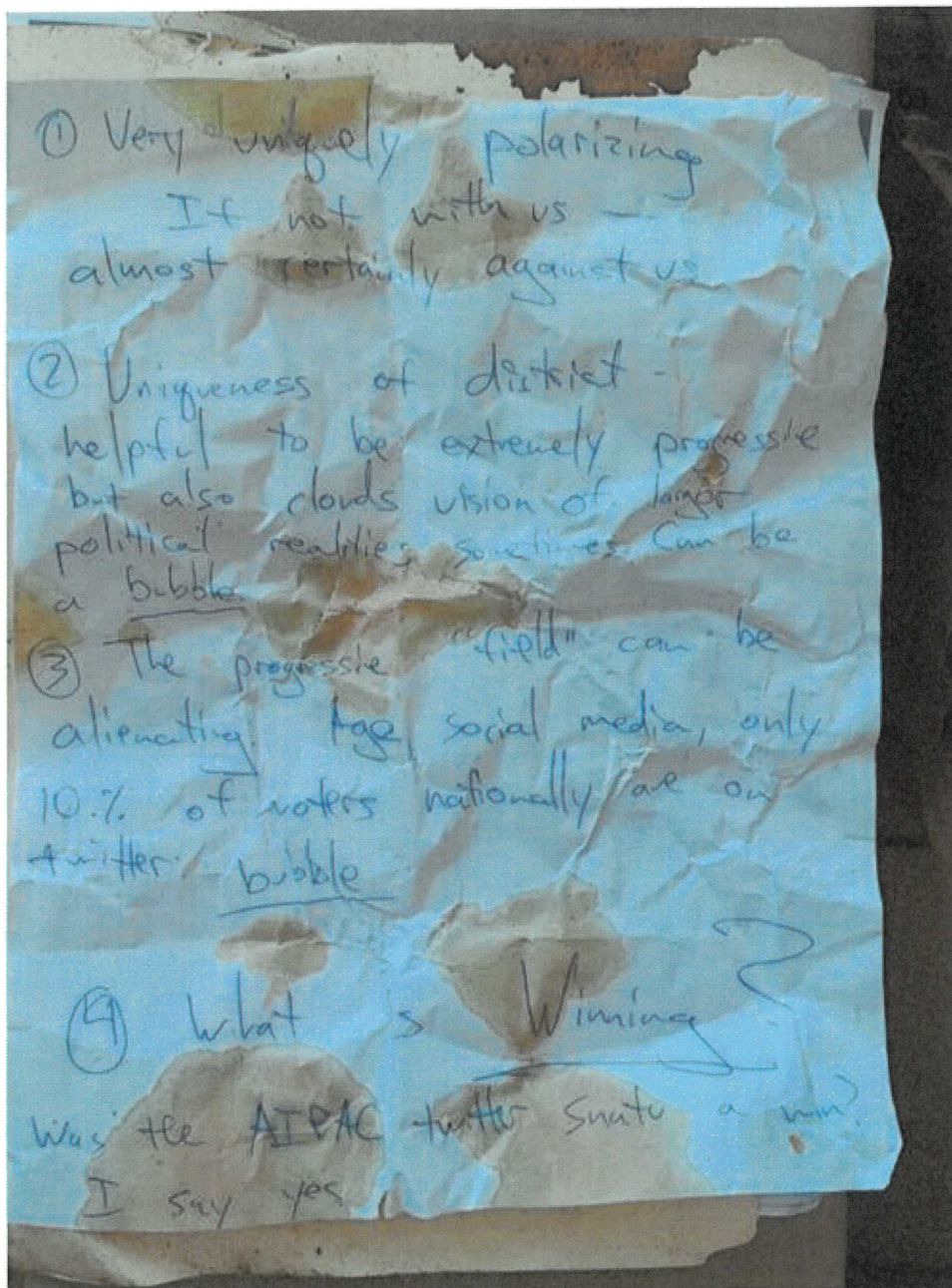
His sister (Who is also confirmed now to be Congresswoman Omar's sister) Leila Nur Said Elmi is also a resident of this address.

Other immediate Elmi family members in the UK include another sibling, Mohamed Nur Said Elmi, who resides at a separate address in London.

Multiple samples containing bodily fluids and personal items were obtained legally through trash waste and litter from personal vehicles in the Washington, DC area and United Kingdom.



Discarded postal labels addressed to Congresswoman Omar's DC residence.

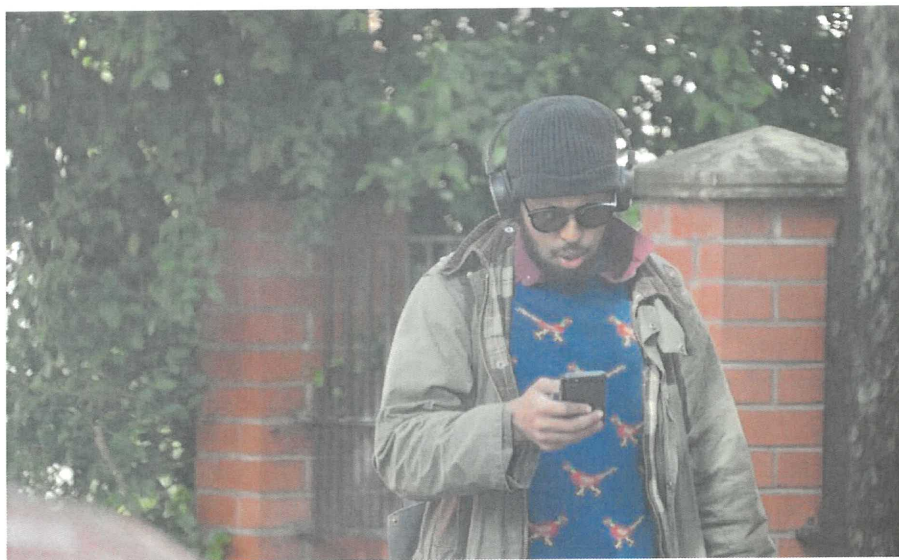
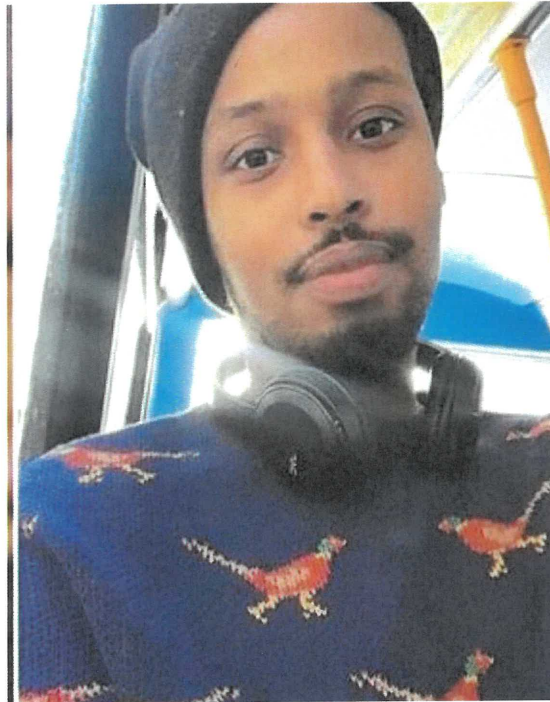


Discarded handwritten notes from Congresswoman Omar.





(339 North End Road, Fulham Sw6 1NN Flat 24, Shipton House, Prince of Wales Road, London NW 3ND, UK)

Surveillance photos of Mr. Ahmed Nur Said Elmi below including an Instagram photo matching the same sweater he is seen in as recently as May 2021.





The below **DNA Siblingship Report** shows a full siblingship match between the DNA samples collected at the residence of Ilhan Omar in Washington, DC and the residence of Ahmed Nur Said Elmi in the United Kingdom.

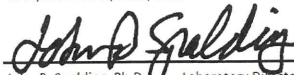
 ENDEAVOR DNA LABORATORIES		DNA Siblingship Report Informational Use Only				 GGC GENERAL GENETICS CORPORATION
Lab ID	265026	Known Parent 1	Sibling 1	Sibling 2	Known Parent 2	
Case ID	GGC170492US_30_5-2	Not Tested	Cigarette Butt	Straw	Not Tested	
	Race		Other	Other		
	Sample No.		1002-41905	1002-41906		
	Date of Collection		Unknown	Unknown		
STR Locus	F/N	Alleles Called	Alleles Called	Alleles Called	Alleles Called	
Amelogenin			X Y	X		
D3S1358	2.554		15 16	15 16		
D1S1656	14.221		15 16.3	15 16.3		
D2S441	3.448		14 15	12 15		
D10S1248	9.843		11 14	11 16		
D13S317	1.325		12 13	11 13		
Penta E	0.250		12 14	11 15		
D16S539	1.108		11	11 12		
D18S51	7.557		15 17	15 17		
D2S1338	1.091		19 25	19 23		
CSF1PO	0.975		9 12	12		
Penta D	25.110		10 14	10 14		
TH01	0.674		7 9	6 7		
vWA	4.504		16 18	16 18		
D21S11	0.755		29 30	30 31.2		
D7S820	0.675		10 11	10 10.1		
D5S818	0.603		11 12	12 13		
TPOX	0.760		9 11	8 11		
D8S1179	2.030		15	14 15		
D19S433	10.075		14 15.2	14 15.2		
FGA	7.348		21 23	21 23		
D22S1045	4.872		11 16	11 16		
The Genetic Evidence Indicates the Tested Relationship is Supported. Based on the analysis of STR loci listed above, the probability of full siblingship is 99.999998%. This probability is calculated by comparing to an untested, unrelated, random individual of the general population (assumes prior probability = 0.50). The positive predictive value (PPV) for two party comparisons evaluating more than 15 STR loci is greater than 99% when the likelihood ratio is greater than 10. The negative predictive value (NPV) for two party comparisons evaluating more than 15 STR loci is greater than 99% when the likelihood ratio is less than 0.1. The PPV equals the proportion of subjects correctly identified as being related. The NPV equals the proportion of subjects correctly identified as unrelated. These results do not supercede testing involving additional participants related to sibling 1 or sibling 2.						
			Likelihood Ratio 47,352,360 Probability of Full Siblingship versus No Relation 99.999998%			

The First Sibling's profile obtained from Lab ID 260292. The Second Sibling's profile obtained from Lab ID 264235.

Test results are for informational purposes only. Samples were not collected under a strict chain of custody. Patient names and sample origin cannot be verified.


 Daniel Slowinski DNA Analyst III

I, the undersigned Laboratory Director, verify that the interpretation of the results is correct as reported on April 29, 2021.


 John B. Spalding, Ph.D. Laboratory Director

DNA amplified with PowerPlex® Fusion System, detected using the ABI PRISM® 3130xl Genetic Analyzer and analyzed with GeneMapper® ID Software. Testing performed by Endeavor DNA, Inc.
 Endeavor DNA, Inc. is an A2LA and ISO/IEC 17025:2017 Accredited Laboratory, A2LA Certificate Number 4049.01. Endeavor DNA, Inc. is a body that has been accredited by the Ministry of Justice as a body that may carry out parentage tests directed by the civil courts in England and Wales under section 20 of the Family Law Reform Act 1969.

6955 N MESA ST, SUITE 109, EL PASO, TX 79912 | PHONE: 915-519-1600 | ENDEAVORDNA.COM

C. Omar lived with both Hirsi and Elmi at the same time.

Omar has stated the following publicly:

In 2002, when I was 19 years old, Ahmed Hirsi ... and I, applied for a marriage license, but we never finalized the application and thus were never legally married. In 2008, we decided to end our relationship in our faith tradition after reaching an impasse in our life together.

I entered into a relationship with a British citizen, Ahmed Nur Said Elmi, and married him legally in 2009. Our relationship ended in 2011 and we divorced in our faith tradition. ...

Since 2011, I am happy to say that I have reconciled with Ahmed Hirsi, we have married in our faith tradition and are raising our family together.

Omar's first claim — that she and Ahmed Hirsi underwent an Islamic divorce “to end [their] relationship” in 2008 — cannot be reconciled with their official address records.

Consider the following:

— From 2002 until 2009, Omar lived in a series of apartments in Minneapolis with Ahmed Hirsi.

— In 2009, Ilhan Omar married British citizen Ahmed Nur Said Elmi.

— In August 2009, records show that both Omar and Ahmed Nur Said Elmi left Minnesota, moving to 2608 Pacific Dr. South, Apt. 4, Fargo, North Dakota 58103. (The record we found for Elmi did not include the apartment number.)

— However, records show that Ahmed Hirsi moved there, too.

In August 2009, Ahmed Hirsi is recorded at 2608 Pacific Dr. South, Apt. 4, Fargo, North Dakota 58103.

Omar, her Islamically divorced first husband, and her second husband are all recorded to live at the same apartment at the same time.

— In February 2010, both Omar and Ahmed Hirsi are recorded as having moved to 2438 18th St. South, Fargo, North Dakota 58103.

— Records show that Ahmed Elmi, Omar's legal husband, appears at this new address in November 2010, nine months later.

To summarize:

— Address records show that Omar lived at the same address with the man she claimed to have divorced and the man she was legally married to — concurrently. And that she did this twice.

— Omar stated that her relationship with Ahmed Elmi only lasted from 2009 until 2011. But address records show she spent more of that time living with Ahmed Hirsi.

Indeed, she may have lived with Hirsi continuously during her entire marriage to Ahmed Elmi.

Years before this scandal was publicized on the Somali message board, Omar herself confirmed that Ahmed Hirsi was with her in North Dakota.

Perhaps more importantly, Omar also explained what they were doing in Fargo. The following passage appeared in a local Minneapolis news outlet in 2013

within an article titled “Refugee Parent Finds Sense of Home in Minneapolis Neighborhood School”:

After having started their daughter, Isra, in kindergarten in Minneapolis, Omar and her husband, Ahmed Hirsi, moved to North Dakota so that Omar could finish her bachelor’s degree in political science.

From 2009 to 2011, Omar was enrolled at North Dakota State University (NDSU) in Fargo. British citizen Ahmed Nur Said Elmi was also enrolled at NDSU during this period. And, although they did not legally divorce until 2017, this two-year stretch covers virtually the entire period during which Omar claims she and Elmi were in a relationship.

Federal student aid applications, or FAFSAs, are treated differently by loan officers if an applicant is married. Loan officers are not allowed to consider the assets of a married applicant’s parents when constructing the loan terms. Fewer assets demonstrate greater need, and likely will result in loan terms more favorable to the applicant.

LEGAL AUTHORITY FOR THE PROSECUTION OF OMAR

Omar committed numerous criminal offenses.

I. Marriage Fraud

A. Elements of marriage fraud

Under 8 U.S.C. § 1325(c), marriage fraud is committed by any individual that enters a marriage for the purpose of evading a provision of the immigration laws. To prove marriage fraud, the government must show that (1) the defendant knowingly entered into a marriage (2) for the purpose of evading any provision of the immigration laws. *See* 8 U.S.C. § 1325(c).

Nothing in the statute's plain language indicates that a person need actually apply for immigration benefits to violate the statute. Instead, all of the elements of marriage fraud are satisfied when the defendant enters into the marriage. *United States vs. Rojas*, 718 F.3d 1317, 1320 (11th Cir. 2013).

B. Statute of Limitations for Marriage Fraud

Because the text of § 1325(c) itself does not reference a specific statute of limitations, the state of limitations is the general five-year federal statute. *See* 18 U.S.C. § 3282(a). (“Except as otherwise expressly provided by law, no person shall be prosecuted, tried, or punished for any offense, not capital, unless the indictment is found, or the information is instituted within five years after such offense shall have been committed.”).

Statutes of limitations normally begin to run when the crime is complete, and that principle applies to the offense of marriage fraud. The plain language of the marriage fraud statute cannot plausibly be read to require that a defendant take

the additional step of filing for immigration benefits in order for the crime to be complete. Therefore, the crime of marriage fraud is complete, and the five-year statute of limitations begins to run on the date that the parties were married, rather than on the date one of the parties filed documents for immigration benefits.

Immigration and Nationality Act, § 275 (c), 8 U.S.C § 1325(c); *United States vs. Rojas*, 718 F.3d 1317, 1320 (11th Cir. 2013). Marriage fraud is thus not a continuing offense. *Rojas*, 718 F.3d at 1320.

According to Minnesota public records, Omar was married to Elmi on February 12, 2009. Because her marriage to Elmi occurred more than 10 years ago, the statute of limitations for marriage fraud may bar prosecution of her for that offense.

II. Other Immigration Fraud Offenses

A. Statue of limitations for other immigration offenses

Federal law extends the general federal statute of limitations from 5 years to 10 for the following immigration offenses and the conspiracy to commit them:

- Obtaining citizenship or naturalization illegally. 18 U.S.C § 1425
- Using false or fraudulent citizenship papers. 18 U.S.C § 1423
- Impersonating another as an applicant, declarant, petitioner, or witness in citizenship or naturalization proceedings. 18 U.S.C § 1424

See 18 U.S.C § 3291, Nationality, citizenship, and passports. (“No person shall be prosecuted, tried, or punished for violation of any provision of sections 1423 to

1428, inclusive, of chapter 69 and sections 1541 to 1544, inclusive, of chapter 75 of title 18 of the United States Code, or for conspiracy to violate any of such sections, unless the indictment is found, or the information is instituted within ten years after the commission of the offense.”)

The public does not know whether Elmi applied for a Green Card. Only he, Omar, and the U.S. Government knows for sure. Reportedly, both ICE and the FBI have opened files into this matter. Presumably those organizations know.

If Elmi did in fact apply for a Green Card, based on his fraudulent marriage to his sister Omar, then she violated one or more of the above immigration offenses (§§ 1423-1425). Depending on when Elmi applied for a Green Card, the Statute of Limitations may not have yet expired.

III. Student Loan Fraud

Both 18 U.S.C. § 495 and 18 U.S.C. § 1001 prohibit making false statements in any matter within the jurisdiction of any department of the United States, including federally insured student loans. Those statutes do not require that any money actually be obtained. Additionally, 20 U.S.C. § 1097(a) prohibits obtaining federally guaranteed funds by fraud or by making false statements. Therefore, that crime is not complete until the defendant or co-conspirator obtains the loan funds. The statute of limitations for these offenses is 5 years. 18 U.S.C. § 3282.

IV. Conspiracy

A. Elements of Conspiracy

To prove a conspiracy under 18 U.S.C. § 371, the government must prove

- (1) an agreement between two or more persons to pursue an unlawful objective;
- (2) the defendant's knowledge of the unlawful objective and voluntary agreement to join the conspiracy; and
- (3) an overt act by one or more of the members of the conspiracy in furtherance of the objective of the conspiracy.

B. Statute of limitations for conspiracy

Conspiracy crimes can in some cases lengthen the statute of limitations. For instance, in conspiracies prosecuted under 18 USC § 371 involving a conspiracy to commit a federal offense, or to defraud the United States, the statute begins to run on the date that the last act that was a part of the conspiracy was taken.

To charge Omar with conspiracy to commit immigration fraud under 18 U.S.C § 1423, 1424, or 1425, the Government would need to identify an action she took to further the conspiracy within the last ten years.

Omar's filing for divorce from Elmi in 2017 was an act in furtherance of the conspiracy. Note: Omar (re)married Hirsi on January 5, 2018.

What other possible motive could Omar have had for "marrying" and then "divorcing" her brother Elmi other than immigration fraud or student loan fraud? Why else would she marry her brother, and live with him, while still living with her first husband and conceiving a child with him?

V. Aiding and Abetting

1. Elements of Aiding and Abetting

The federal aiding and abetting statute, 18 U.S.C. § 2, states that a person who aids, abets, counsels, commands, induces or procures the commission of a federal offense is punishable as a principal. *Rosemond v. United States*, 572 U.S. 65, 70 (2014). A person is liable under § 2 for aiding and abetting a crime if (and only if) he (1) takes an affirmative act in furtherance of that offense, (2) with the intent of facilitating the offense's commission. *Id.* at 71. The statute comprehends all assistance rendered by words, acts, encouragement, support, or presence even if that aid relates to only one (or some) of a crime's phases or elements. *Id.* at 73.

Direct evidence of a conspiracy is unnecessary; each element may be inferred from circumstantial evidence. *United States v. Willett*, 751 F.3d, 335, 339 (5th Cir. 2014).

B. Statute of Limitations for Aiding and Abetting

The statute of limitations for aiding and abetting is the same as for the principal crime, in this case 5 or 10 years (see above discussion).

VI. Tax Fraud

A. Elements of Tax Fraud

It is a federal crime to (1) willfully attempt in any manner to evade or defeat any tax imposed or the payment thereof; or (2) to willfully complete and sign a tax

return which the person does not believe to be true and correct as to every material matter. 26 U.S.C. §§ 7201, 7206(1).

B. Statute of Limitations for Tax Fraud

The statute of limitations for all federal tax crimes is 6 years. 26 U.S.C. § 6531.

The State of Minnesota Campaign Finance and Public Disclosure Board has already determined that 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 Omar for 2014 and 2015 were filed as “joint” tax returns with a man who was not her husband. She filed joint returns with Ahmed Hirsi, while she was actually married to Ahmed Elmi.

Omar’s federal tax returns should be examined to determine whether any additional falsifications were made.

It has been reported that Omar filed amended tax returns. Why did she do so? Those amended returns are in the custody of the Internal Revenue Service (IRS) and the Minnesota Department of Revenue (MNDOR).

VII. Perjury

A. Elements of Perjury

Perjury is defined as making a false material statement not believing it to be true in any of the following cases:

- (1) in or for an action, hearing or proceeding of any kind in which the statement is required or authorized by law to be made under oath or affirmation;
- (2) in any writing which is required or authorized by law to be under oath or affirmation;**
- (3) in any writing made in an unsworn foreign declaration;
- (4) in any writing made in a court document; or
- (5) in any other case in which the penalties for perjury are imposed by law, and no specific sentence is otherwise provided.

Minn. Stat. § 609.48 (2020) (emphasis added).

B. Statute of Limitations for Perjury

The statute of limitations for perjury in Minnesota is 3 years. Minn. Stat. § 628.26(k) (2020).

CONCLUSION

Rep. Ilhan Omar must be investigated and prosecuted under US Federal Criminal Code, Minnesota laws, and a formal House Ethics Committee investigation. This matter has gone ignored for far too long, and the constituents of Minnesota's Fifth Congressional District deserve much better.

Report prepared for BIG TENT REPUBLICANS PAC

Contact: office@bigtentrepublicans.org

Visit IlhanOmarDNA.com for more information on
this investigation.

EXHIBIT C

A portrait of a woman wearing a blue and red patterned hijab, smiling. She is wearing a dark blazer.

STATEMENT FROM OMAR'S SPOKESPERSON

"Accusations that the congresswoman married her brother are absurd and offensive. This is right-wing fodder with no basis in reality. It is disgusting that the right-wing continues to spread falsehoods for clicks."

STATEMENT TO "THE WILL CAIN SHOW"



★ THE WILL CAIN SHOW ★