

STATE OF MINNESOTA

DISTRICT COURT

HENNEPIN COUNTY

FOURTH JUDICIAL DISTRICT
Case Type: Civil-Other

ANTON J. LAZZARO,

Plaintiff,

Court File No. _____

vs.

ILHAN OMAR,

Defendant.

SUMMONS

THIS SUMMONS IS DIRECTED TO: Ilhan Omar

1. **YOU ARE BEING SUED.** The Plaintiff has started a lawsuit against you. The Complaint is attached to this Summons. Do not throw these papers away.
2. **YOU MUST REPLY WITHIN 21 DAYS TO PROTECT YOUR RIGHTS.** You must **BOTH** reply, in writing, **AND** get a copy of your reply to the person/business who is suing you within 21 days to protect your rights. Your reply is called an Answer. Getting your reply to the Plaintiff is called service. You must serve a copy of your Answer or Answer and Counterclaim (Answer) within 21 days from the date you received the Summons and Complaint.
3. **ANSWER.** you can find the Answer form and instructions on the MN Judicial Branch website at www.mncourts.gov/forms under the "Civil" category. The instructions will explain in detail how to fill out the Answer form.
4. **SERVICE.** You may lose your case if you do not send a written response to the Plaintiff. If you do not serve a written Answer within 21 days, you may lose the case by default. You will not get to tell your side of the story. If you choose not to respond, the Plaintiff may be awarded everything they asked for in their Complaint. If you agree with the claims stated in the Complaint, you don't need to respond. A default judgment can then be entered against you for what the Plaintiff asked for in the Complaint. To protect your rights, you must serve a copy of your Answer on the person who signed this Summons in person or by mail at this address:

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

5. Carefully read the instructions (CIV301) for the Answer for your next steps.

6. **LEGAL ASSISTANCE.** You may wish to get legal help from an attorney. If you do not have an attorney and would like legal help: Visit www.mncourts.gov/selfhelp and click on the "Legal Advice Clinics" tab to get more information about legal clinics in each Minnesota county. Court Administration may have information about places where you can get legal assistance. **NOTE:** Even if you cannot get legal help, you must still provide a written Answer to protect your rights or you may lose the case.
7. **ALTERNATIVE DISPUTE RESOLUTION (ADR).** The parties may agree to be or be ordered to participate in an ADR process under Rule 114 of the Minnesota General Rules of Practice. You must still serve your written Answer, even if you expect to use ADR.

Respectfully submitted,

Dated: _____

4/6/26



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Respectfully submitted,

Dated: 4/6/26



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vs.

ILHAN OMAR,

Defendants.

COMPLAINT

JURY TRIAL DEMANDED

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 Lacey 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 slurs.

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.

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. 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, and such other relief as the Court deems just and equitable.

Parties

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

12. 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

13. The Court has subject matter jurisdiction over Lazzaro's claims for declaratory and injunctive relief because they arise under Minnesota law.

14. The Court has the power to issue a declaration pursuant to the Minnesota Declaratory Judgment Act.

15. Venue is proper in this district 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.

Allegations

16. 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.

17. 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.

18. 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."

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

20. 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.

21. 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 MI6 agents from the United Kingdom to privately investigate the allegations.

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

23. 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.

24. Elmi's whereabouts were unknown.

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

26. 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.

27. Within days, Endeavor confirmed that the samples from Omar and Elmi were a 99.9999% probability match of full siblingship. See Exhibit A, DNA Report Screenshot.

28. 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!"

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

federal level, Lazzaro would have also violated 18 U.S.C. § 1001, based on his social media activity directed at the Minneapolis FBI office and other federal agencies.

Count 1: Defamation

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

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

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

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

44. 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 2: Defamation Per Se

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

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

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

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

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

50. 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.

51. 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.

Respectfully submitted,

Dated: 4/6/26



Anton J. Lazzaro
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Sandstone, MN 55072
Pro se

Acknowledgement

The undersigned hereby acknowledges that, pursuant to Minn. Stat. § 549.211, costs, disbursements and reasonable attorneys' fees and other sanctions may be awarded to the opposing party or parties in this litigation if the Court should find the above-signed acted in bad faith, asserted a claim or defense that is frivolous and costly to the other party, asserted an unfounded position solely to delay the ordinary course of proceedings or to harass, or committed a fraud upon the Court.



Anton J. Lazzaro