

**State of Minnesota**

County  
Hennepin

**District Court**

Judicial District: Fourth  
Court File Number: \_\_\_\_\_  
Case Type: Civil

A.J. Kern, Congressional Candidate  
Plaintiff

Vs

Ilhan Omar, and Don Samuels,  
Congressional Candidates, Steve Simon,  
in his capacity as Minnesota Secretary of  
State  
Defendants

**Civil Complaint**

The Plaintiff, AJ Kern makes the following complaints against the Defendants Ilhan Omar, Don Samuels, congressional candidates and Steve Simon, Secretary of State. For the reasons set forth below, and in the attached Memorandum, AJ Kern is requesting proof the citizenship of foreign-born congressional candidates, Ilhan Omar and Don Samuels.

**Introduction**

Candidate AJ Kern is requesting proof as to qualifications for office, that candidates Ilhan Omar and Don Samuels provide the underlying proof and documentation as to if, when or how they became United States Citizens to support their sworn Affidavits of Candidacy, to wit, the exact date when they became Citizens of the United States. The proof of the date and proof of citizenship of Ilhan Omar and Don Samuels is all that A J Kern requests be provided to her, the Secretary of State, facilitated by this court. Candidate AJ Kern and Minnesota voters have a right to demand the state verify the citizenship of their candidates for the United States Representative as required by the United States Constitution.

Neither candidate has provided official naturalization documents to the MINNESOTA SECRETARY OF STATE or otherwise, thereby, which is needed to provide indisputable proof of

citizenship in accordance with the U.S. Constitution, Article 1, Section 2, Clause 2, being “...seven years a citizen”.

*“Writing in THE FEDERALIST with reference to the election of Members of Congress, Hamilton firmly stated that [t]he qualifications of the persons who may . . . be chosen . . . are defined and fixed in the constitution; and are unalterable by the legislature.”*

#### Parties

1. Plaintiff AJ Kern for Congress is a candidate running in Minnesota’s 5<sup>th</sup> Congressional District 2022 DFL primary. See [www.AJKern.com](http://www.AJKern.com).
2. Defendant Ilhan Omar is a foreign-born candidate running for Minnesota’s 5<sup>th</sup> Congressional District in the August 2022 DFL primary. See [www.ilhanomar.com](http://www.ilhanomar.com)
3. Defendant Don Samuels is a foreign-born candidate running for Minnesota’s 5<sup>th</sup> Congressional District in the August 2022 DFL primary. [www.donsamuels.com](http://www.donsamuels.com)
4. Defendant Minnesota Secretary of State (MN SOS), Steve Simon is a constitutional executive officer sued only in his official capacity as the Secretary of State. Steve Simon in his official capacity, is the governing body ultimately in charge of enforcing the Constitutional requirements for federal candidates, ensuring that all foreign-born candidates do indeed qualify to be placed on an election ballot.
5. As the chief election official in Minnesota, the Secretary of State partners with local election professionals to administer elections and adopt rules to administer elections. The Secretary of State acts on behalf of the State of Minnesota in exercising his duties regarding Federal , State, County and Local elections, promulgating and executing election laws within the state.
6. The Election process includes the filing of Affidavits of Candidacy, and eligibility to be a candidate in any election within the state. The Secretary is the statewide election officer responsible for the policies relating to the conduct of elections within the State.

#### Standing

7. The Plaintiff, AJ Kern, *has standing as a candidate and congressional election challenger*, not being an advisory opinion nor moot, now respectfully requests the Court take action on her petition to provide official naturalization documents of both Rep. Ilhan Omar and congressional candidate Mr. Don Samuels, therefore, indisputably confirming

citizenship of both candidates before their names are qualified to be placed on the August 2022 primary ballot for Minnesota's 5<sup>th</sup> Congressional District, and the November 8, 2022 ballot.

8. Contestants have standing to bring this election contest under Minn. Stat. Ch. 209

#### Jurisdiction

9. Minnesota is the proper jurisdiction. Minnesota's 5th congressional district is a geographically small urban and suburban congressional district in Minnesota. It covers eastern Hennepin County, including the entire city of Minneapolis, along with parts of Anoka and Ramsey counties. Besides Minneapolis, major cities in the district include St. Louis Park, Richfield, Crystal, Robbinsdale, Golden Valley, New Hope, Hopkins, Fridley, and northeast Edina.
10. Under Minn. Stat. sec. 209.021 Subd 2, personal jurisdiction can rest in the State of Minnesota, and the County of Hennepin, Anoka or Ramsey. The Minnesota Congressional seat for United States Representative is a race that involves the 5<sup>th</sup> Congressional District, to include Hennepin County.
11. Subject matter jurisdiction can be dictated by Minn. Stat. 209.12 which provides that evidence as to the question of the right of any person to nomination or office on the ground of deliberate, serious, and material violation of the provisions of the Minnesota Election Law, must be taken and preserved by the judge trying the contest, or by some person appointed by the judge for that purpose.

#### Facts

12. The Plaintiff sent a certified letter to Defendants Rep. Ilhan Omar and Don Samuels requesting proof of citizenship. The Defendants did not respond. **Ex A and B.**
13. AJ Kern, Ilhan Omar and Don Samuels are congressional candidates.
14. The citizenship of congressional candidates, AJ Kern, Ilhan Omar and Don Samuels are based on the honor system. The honor system is defined as a system of examination that relies solely on the honesty of those concerned.
15. AJ Kern was born in the United States.
16. Upon information and belief, Ilhan Omar was born in Somalia. Ilhan Omar is a foreign born congressional candidate.

17. Upon information and belief, Don Samuels was born in Jamacia. Don Samuels is a foreign born congressional candidates.
18. Before a general election, there is a two-week filing period during which candidates for office can submit their Affidavit of Candidacy to the filing officer, Defendant Steve Simon, the Secretary of State.
19. Candidates for United States Representative must file from May 17, 2022 until May 31, 2022 at 5 pm for the 2022 election.
20. The process to become a candidate and run for election is set forth on the Secretary of State website. <https://www.sos.state.mn.us/election-administration-campaigns/become-a-candidate>.
21. Each candidate files an Affidavit of Candidacy with a filing fee in the form attached. **Ex C**
22. Candidates must make sure they are qualified before filing for office as stated on the Secretary of State website.
23. The candidate qualifications are set forth on the Secretary of State's website.
24. To qualify as a candidate for the United States Representative , the candidate:
  - must be an inhabitant of Minnesota when elected
  - must be at least 25 years old upon assuming office
  - must be a citizen of the United States at least seven years upon assuming office

**Ex D**

25. The sworn Affidavit of Candidacy must be completed, signed before a notary public and under oath, and filed within the two week period, in order for the candidate to be on the ballot.
26. Specifically congressional candidates for United States Representative are required in the Affidavit of Candidacy to swear or affirm under oath that they will be an inhabitant of the state of Minnesota when elected, will be *a citizen of the United States for not less than seven years on the next January 3rd, or if filled at special election, within 21 days after the election.* “ See **Ex C, D**
27. Plaintiff, AJ Kern, was born in the United States. She was born on October 1, 1960. She can provide her birth certificate to the other candidates, the Secretary of State, and this Court to support the sworn facts in her Affidavit of Candidacy. As a citizen of the United States, AJ Kern qualifies to be a candidate for the United States Representative.

28. Defendants Ilhan Omar and Don Samuels were not born in the United States. Neither has provided supporting documentation of the if, how or when they became a citizen of the United States.
29. Each of them should be able to --- and required to--- provide proof that they are a citizen of the United States to support the sworn facts in their respective Affidavits of Candidacy signed under oath.
30. Defendant Ilhan Omar was born in Somalia, and Defendant Don Samuels was born in Jamaica.
31. Because of the honor system, neither candidate has provided their proof of citizenship and naturalization to the Secretary of State.

Ilhan Omar

32. Ilhan Omar was born in Somalia's capital, Mogadish. She states this as a fact on her website. [www.IlhanOmar.com](http://www.IlhanOmar.com)
33. She and her family moved to America in 1995. She states this as a fact on her website. In a video interview she stated that the date she and her family moved to America was March 8, 1995.
34. On her website, she claims to have been 12 years old when she moved to America. If she was 12 years old, as she claims on her website, she would have been born on October 4, 1982.
35. She claims on her website that age 17 she becomes an American Citizen. Age 17 would make her a minor.
36. For the years up to and until on or about May 17, 2019, Ilhan Omar claimed to have been born on October 4, 1981, not October 4, 1982. This would make her the age of 18 on March 8, 2000, which would be the 5<sup>th</sup> year anniversary of when she and her family moved to America.
37. Upon information and belief, her claim to have been born on October 4, 1982 is untrue.
38. As a refugee, she seems to be claiming that she became an American citizen as a minor under the age of 18 through her father but, upon information and belief, that is not possible.
39. Ilhan Omar claims in the year 2000 that she became a United States Citizen, and she claims she was 17 years old, a minor at the time.

40. If her birth year was 1981, as she originally posted for the years before May 17, 2019, she would have been 18. Whether her birth year was 1981 or 1982, upon information and belief, the time line for her father to become a naturalized United States citizen makes it impossible that he did so while Ilhan Omar was a minor.
41. She claims to have graduated from college in 2011, which would make her 28 or 29 when she graduated from college, depending on her birth year.
42. In 2016, she was elected to the *Minnesota* House of Representatives, where there is no requirement to be a citizen of the United States. Citizenship is only a requirement to be a candidate for the *United States* House of Representative. For her years in the Minnesota House of Representatives, she listed her birth year as October 4, 1981 on her congressional page.
43. In November 2018, Ilhan was elected to the United States House of Representatives, and continued to list her birthdate as October 4, the year as 1981. At the time she was elected in 2018, she was required to have been a United States Citizen for the seven years prior to her taking office , January 3, 2019. She would have had to be a citizen of the United States since January 3, 2012. She claims to be “ the first Somali-American, the first *naturalized* citizen from Africa” to serve in Congress.
44. But the only way she could be a “naturalized” citizen , as she claims, was through her father, Nur Omar Mohamed.
45. Her father, Nur Omar Mohamed died on June 15, 2021. See **Ex. E**
46. Upon information and belief, his records with the USCIS, United States Citizenship and Immigration Services, should be available in light of his death.making his records available. Plaintiff learned from the USCIS that a death certificate or obituary can be used to attempt to obtain the data on her father, Nur Omar Mohamed’s citizenship. She also learned that immediate family members only can obtain Mr. Mohamed’ s death certificate from the Department of Vital Statistics, Minnesota.
47. Plaintiff plans on attempting to obtain this data with the obituary of Nur Omar Mohamed, indicating that he died on June 15, 2021, attached as **Ex E**.
48. When Ilhan Omar was claiming on her state and federal congressional sites to be born in 1981, (changed only to 1982 on or about May 17, 2019) Plaintiff researched and learned that it would have taken her father over six years to be naturalized himself.
49. More recently, Plaintiff learned that Nur Omar Mohamed, Ilhan Omar’s father, could only “apply” for citizenship, at the earliest, 6 years after moving to the United States, and the timeline is nearly impossible for Nur Omar Mohamed to have become a citizen while Ilhan Omar was a minor under 18.

50. Refugees have to live here for 1 year before they can apply for “permanent residence”. See **Ex 5** to Memorandum USCIS Welcomes Refugees and Asylees.
51. If Ilhan Omar and her family moved here in March 8, 1995, her father could only *apply* for permanent residency on or after March 8, 1996, and he would have to wait to obtain permanent residency. He does not obtain permanent residency until he goes through the application process. It takes a full year of a waiting period to even apply for a permanent residence. In other words, her father could only *apply* on or after March 8, 1996, and he would have to wait to get his permanent residency application accepted and approved, sometime after he applied, a period of over 90 days.
52. Then if and when her father got his permanent residency (it is not automatic), he would then have to wait another 5 years from that point--- from the date he got permanent residency----- to even apply for citizenship. Again, there are waiting periods to apply, one year for the permanent residency, and 5 years for the application for citizenship, at least 6 years. The applications are not automatic. They are just an applications.
53. Considering the timeline promulgated by the United States Citizenship and Immigration Services, it is highly unlikely, nearly impossible, that Ilan Omar’s father, Nur Omar Mohamed, became a naturalized citizen when Ilhan Omar was under the age of 18, whether her birthyear was 1981 or 1982.
54. On or before May 15, 2019, Plaintiff learned that Ilhan Omar could not be a United States Citizen through her father, raising the issue that in light of her stated birthyear of 1981, she could not possibly have been a minor and under 18, within the first 5 year waiting period for naturalization that her father. Plaintiff AJ Kern then published a video on Youtube on May 15, 2019. <https://www.youtube.com/watch?v=z20DMqLFVv8>
55. After serving as a United States Representative for nearly 6 months, and over a year after having filed the Affidavit of Candidacy, her congressional staff, made a phone call on May 17, 2019 to the Minnesota Legislature Librarian, Elizabeth Lincoln. With a phone call on May 17, 2019, her birth year was changed from 1981 to 1982 to make her appear to be younger on the United States Congressional website, her state biographical page, and other forms of media. **Ex F**
56. But Ilhan Omar’s sudden change in birthyear, from October 4, 1981 to October 4, 1982, 6 months into her term as United States Representative to make her younger, did not resolve the issue, even if she claims she was 17 the year her father was naturalized, which would have been next to impossible if she moved to the United States with her father on March 8, 1995 as she claims, and considering the timeline for her father to become a citizen of the United States.
57. Plaintiff took screen shots of the change in an article she wrote June 3, 2019. **See Exhibit 2 to Memorandum.**

58. Even today, a certain website has both birth years, 1981 and 1982 <https://biographymask.com/ilhan-omar/>
59. Plaintiff AJ Kern, as a candidate, is raising the issue that Ilhan Omar could not possibly have become a citizen in the year 2000, whether she was age 17, or age 18 , because her father was not eligible for naturalization until 2001, when she would have been either 18 or 19 , not a minor.
60. A J Kern requests strict proof as to if, how and when Ilhan Omar became a citizen of the United States.

Don Samuels

61. The Plaintiff sent a certified letter to Mr. Don Samuels requesting a notarized consent letter allowing the Plaintiff to obtain naturalization records from the USCIS. The defendant did not respond. See **Ex A and B**
62. On Don Samuels' website, he says he was born in Jamaica. He does not state the date or year he moved to America. He states that he attended New York's Pratt Institute. He does not state if or when he graduated.
63. He says he met "the love of his life" Sondra Hollinger, and was a single father without giving the year they met. He does not say if, or when he married Sondra Hollinger or, anyone or who the mother of his child is..
64. Don Samuels states he ran for a seat on the City Council in North Minneapolis, and won, and served for an undetermined amount of time. His website said he left City Hall, but does not state a year.
65. Other sources say he served on the City Council for many years, from February 2003-2014, according to Ballotpedia.
66. Don Samuels was not required to be a citizen of the United States to serve on the City Council.
67. Nowhere does Don Samuels state that he is a United States citizen, and there are no references to his obtaining citizenship on his website or ballotpedia.
68. Plaintiff AJ Kern is a candidate raising this issue that Don Samuels my not be a Citizen of the United States, and therefore does not qualify to be a candidate for the United States Representative, and puts Don Samuels to strict proof of if, how and when he became a United States Citizen.



76. Under color of law MINNESOTA SECRETARY OF STATE, Steve Simon in his official capacity, is providing the appearance of vetting federal candidates, yet is fundamentally obstructing, impeding, and preventing the American people from the ability to incontestably confirm *all* U.S. Constitutional qualifiers of federal candidates are met. Failing to require proof of citizenship through naturalization records, the MINNESOTA SECRETARY OF STATE has essentially amended the U.S. Constitution by making 'citizenship' null and void, in effect, because that data is not verifiable and accessible to the public.
77. There is a strong prima facie presumption that Ilhan Omar did *not* derive citizenship through her father, Nur Omar Mohamed. Further, there is no indication she applied to be a citizen of the United States herself. Ilhan Omar's own citizenship status may have been invalid due to these circumstances or related events. The circumstances of Omar acquiring U.S. citizenship remain murky in public reports. Because the basis of Omar's citizenship is unclear, the role of these events in her own naturalization as a citizen is unverifiable. However, the details disclosed warrant verification of citizenship by official naturalization records obtained from the USCIS and subject to verification.
78. Additionally, based on the fact that the MINNESOTA SECRETARY OF STATE's office does not verify the citizenship of foreign-born federal candidates, Don Samuels does not reveal if, how or when he became a citizen. The citizenship of Don Samuels, born and raised in Jamaica, is also unknown, and subject to verification and strict proof.
79. Until the citizenship of Rep. Ilhan Omar and congressional candidate Mr. Don Samuels have been verified, they have no legitimate right to be placed on a primary or a general election ballot for federal office by the Secretary of State, Steve Simon.

Based on the complaints above, Plaintiff, AJ Kern, demands relief as the parties may agree, and if the parties do not agree, as follows:

1. That Rep. Ilhan Omar provide her official naturalization documents, indisputably confirming citizenship, and the date thereof, before her name is qualified to be placed on the August 2022 primary ballot for Minnesota's 5<sup>th</sup> Congressional District, and the November 8, 2022 ballot.
2. That Mr. Don Samuels provide his official naturalization documents, indisputably confirming citizenship, and the date thereof, before his name is qualified to be placed on the August 2022 primary ballot for Minnesota's 5<sup>th</sup> Congressional District, and the November 8, 2022 ballot.
3. That Steve Simons, in his capacity as Secretary of State, require proof of Ilhan Omar's official naturalization documents, and the date thereof, therefore, indisputably confirming her citizenship before she is qualified to be placed on the August 2022 primary ballot for Minnesota's 5<sup>th</sup> Congressional District, and the November 8, 2022 ballot.

4. That Steve Simons, in his capacity as Secretary of State, require proof of Mr Don Samuels official naturalization documents, and the date thereof, therefore, indisputably confirming his citizenship before he is qualified to be placed on the August 2022 primary ballot for Minnesota's 5<sup>th</sup> Congressional District, and the November 8, 2022 ballot.
5. For any other relief the court feels is fair and equitable.

May 6<sup>th</sup>, 2022  
Date

A J Kern  
Signature

Name: A J Kern

P.O. Box 261

Sartell, MN 56377

Telephone: 320-292-1063

E-mail: [ajkern50@gmail.com](mailto:ajkern50@gmail.com)

## ACKNOWLEDGMENT

By presenting this form to the court, I certify that to the best of my knowledge, information, and belief, the following statements are true. I understand that if a statement is not true, the court can order a penalty against me (such as to pay money to the other party, pay court costs, and/or other penalties).

1. The information I included in this form is based on facts and supported by existing law.
2. I am not presenting this form for any improper purpose. I am not using this form to:
  - a. Harass anyone;
  - b. Cause unnecessary delay in the case; or
  - c. Needlessly increase the cost of litigation.
3. No judicial officer has said I am a frivolous litigant.
4. There is no court order saying I cannot serve or file this form.
5. This form does not contain any "restricted identifiers" or confidential information as defined in Rule 11 of the General Rules of Practice ([https://www.revisor.mn.gov/court\\_rules/gp/id/11/](https://www.revisor.mn.gov/court_rules/gp/id/11/)) or the Rules of Public Access to Records of the Judicial Branch ([https://www.revisor.mn.gov/court\\_rules/rule/ra-toh/](https://www.revisor.mn.gov/court_rules/rule/ra-toh/)).
6. If I need to file "restricted identifiers," confidential information, or a confidential document, I will use Form 11.1 and/or Form 11.2, as required by Rule 11.

May 6<sup>th</sup>, 2022  
Date

A J Kern  
Signature

Name: A J Kern  
P.O. Box 261  
Sartel, MN 56377

Telephone: 320-292-1063

E-mail: [ajkern50@gmail.com](mailto:ajkern50@gmail.com)

April 1, 2022

P.O. Box 33079  
Washington, DC  
20033

**COPY**

Dear Representative Omar,

My name is AJ Kern and I am running in the Minnesota CD5 House of Representatives 2022 DFL primary. As a primary challenger, I am verifying that all candidates satisfy the constitutional requirements for serving in the House of Representatives, in accordance with the U.S. Constitution, Article 1, Section 2, Clause 2:

*"No Person shall be a Representative who shall not have attained to the Age of twenty five Years, and been seven Years a Citizen of the United States, and who shall not, when elected, be an Inhabitant of that State in which he shall be chosen."*

I have requested verification of these constitutional requirements through the Minnesota Secretary of State and they informed me that they do not verify qualifications when candidates declare their candidacy. To verify the citizenship aspects of your and other candidates' qualifications, I am requesting notarized letters of consent authorizing my campaign to obtain a certified copy of your naturalization records through the U.S. Citizenship and Immigration Services.

I am particularly focused on your proof of citizenship, given that in May 2019, nearly half a year into your first term in Congress, your staff changed your birth year on your state legislative biographical page, your U.S. Congressional page, and on Wikipedia without explanation or any documentation.

Given the filing deadline, to be placed on Minnesota's general election ballot, is between May 17, 2022, and May 31, 2022, I request your notarized letter be received by my campaign on or before April 29<sup>th</sup>, 2022.

You may send the notarized letter to:

AJ Kern for Congress  
P.O. Box 261  
Sartell, MN  
56377

Respectfully,



AJ Kern

**EXHIBIT A**

April 1, 2022

P.O. Box 50024  
Minneapolis, MN  
55405

**COPY**

Dear Mr. Don Samuels,

My name is AJ Kern and I am running in the Minnesota CD5 House of Representatives 2022 DFL primary. As a primary challenger, I am verifying that all candidates satisfy the constitutional requirements for serving in the House of Representatives, in accordance with the U.S. Constitution, Article 1, Section 2, Clause 2:

*"No Person shall be a Representative who shall not have attained to the Age of twenty five Years, and been seven Years a Citizen of the United States, and who shall not, when elected, be an Inhabitant of that State in which he shall be chosen."*

I have requested verification of these constitutional requirements through the Minnesota Secretary of State and they informed me that they do not verify qualifications when candidates declare their candidacy. To verify the citizenship aspects of your and other candidates' qualifications, I am requesting notarized letters of consent authorizing my campaign to obtain a certified copy of your naturalization records through the U.S. Citizenship and Immigration Services.

Given the filing deadline, to be placed on Minnesota's general election ballot, is between May 17, 2022, and May 31, 2022, I request your notarized letter be received by my campaign on or before April 29<sup>th</sup>, 2022.

You may send the notarized letter to:

AJ Kern for Congress  
P.O. Box 261  
Sartell, MN  
56377

Respectfully,



AJ Kern

**EXHIBIT B**



Office of the Minnesota Secretary of State  
**AFFIDAVIT OF CANDIDACY**

Filing #	_____
Cash/Check #	_____
Amount \$	_____

**Instructions**

All information on this form is available to the public. Information provided will be published on the Secretary of State's website. If filing for partisan office and not a major party candidate, you must file both an affidavit of candidacy and a nominating petition. (*Minn. Stat.* 204B.03)

**Candidate Information**

**Name and Office**

Candidate Name (as it will appear on the ballot) \_\_\_\_\_

Office Sought \_\_\_\_\_ District # \_\_\_\_\_

For Partisan Office, Provide Political Party or Principle \_\_\_\_\_

For Judicial Office, Provide Name of Incumbent \_\_\_\_\_

**Residence Address**

Do not complete if residence address is to be private and checkbox below is marked. All address and contact information is optional for federal, judicial, county attorney, and county sheriff office candidates.

Street Address \_\_\_\_\_

City \_\_\_\_\_ State \_\_\_\_\_ Zip Code \_\_\_\_\_

My residence address is to be classified as private data. I certify a police report has been submitted or I have an order for protection for my (or my family's) safety, or my address is otherwise private by Minnesota law. I have attached a separate form listing my residence address.

**Campaign Address and Contact**

Candidate Phone Number (Required) \_\_\_\_\_

Campaign Contact Address (Required for those who have checked the box above):

Street Address \_\_\_\_\_

City \_\_\_\_\_ State \_\_\_\_\_ Zip Code \_\_\_\_\_

Website \_\_\_\_\_ Email \_\_\_\_\_

**Affirmation**

For all offices, I swear (or affirm) that this is my true name or the name by which I am generally known in the community.

If filing for a state or local office, I also swear (or affirm) that:

- I am eligible to vote in Minnesota;
- I have not filed for the same or any other office at the upcoming primary or general election (except as provided in *M.S.* 204B.06, subd. 1 (2) );
- I am, or will be on assuming office, 21 years of age or more;
- I will have maintained residence in this district for at least 30 days before the general election; and
- If a major political party candidate, I either participated in the party's most recent precinct caucuses or intend to vote for a majority of that party's candidates at the next general election.

If filing for one of the following offices, I also swear (or affirm) that I meet the requirements listed below:

- **United States Senator** – I will be an inhabitant of this state when elected and I will be at least 30 years old and a citizen of the United States for not less than nine years on the next January 3rd, or if filled at special election, within 21 days after the election.
- **United States Representative** – I will be an inhabitant of this state when elected and I will be at least 25 years old and a citizen of the United States for not less than seven years on the next January 3rd, or if filled at special election, within 21 days after the election.
- **Governor or Lieutenant Governor** – I will be at least 25 years old on the first Monday of the next January and a resident of Minnesota for not less than one year on election day. I am filing jointly with \_\_\_\_\_
- **Supreme Court Justice, Court of Appeals Judge, District Court Judge, or County Attorney** – I am learned in the law and licensed to practice law in Minnesota. My Minnesota attorney license number is \_\_\_\_\_ and a copy of my license is attached.
- **State Senator or State Representative** – I will be a resident of Minnesota not less than one year and of this district for six months on the day of the general or special election.
- **County Sheriff** – I am a licensed peace officer in Minnesota. My Board of Peace Officer Standards and Training license number is \_\_\_\_\_ and a copy of my license is attached.
- **School Board Member** – I have not been convicted of an offense for which registration is required under *Minn. Stat.* 243.166.
- **County, Municipal, School District, or Special District Office** – I meet any other qualifications for that office prescribed by law.

Candidate Signature \_\_\_\_\_ Date \_\_\_\_\_

Subscribed and sworn to before me this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_\_.

**EXHIBIT**

Notary public or other officer empowered to take and certify acknowledgement

(Notary stamp)

## BECOME A CANDIDATE

---

Candidates are placed on a ballot in Minnesota after they file for office. The most common way to file for office is to complete an [affidavit of candidacy](#) and pay a [filing fee](#) to the appropriate [filing officer](#) during the two-week [filing period](#).

Some exceptions include:

- [Presidential candidates](#) do not complete affidavits of candidacy or pay a filing fee
- [Petitions](#) can be used in place of a filing fee
- Minor party and independent candidates must use a [petition](#) along with an affidavit of candidacy
- [Write-in candidates](#) may need to file a special form to have their votes counted
- [Special elections](#) may have shorter filing and withdrawal periods

*Campaigning* for an office is different than *filing* for an office. Please see our [Campaigning](#) section for more information about campaign finances and practices.

Candidates should make sure they are [qualified](#) before filing for an office. Candidates have a short period of time during which they can [withdraw](#) their filing.

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EXHIBIT D.1

OFFICE OF THE MINNESOTA  
SECRETARY OF STATE **STEVE SIMON**

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## CANDIDATE QUALIFICATIONS

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Candidates can find information about redistricted election districts on the [Redistricting Changes](#) webpage.

### All Candidates

- must be eligible to vote in Minnesota
- must have not filed for another office at the upcoming primary or general election
- must be 21 years of age or more upon assuming office
- must have maintained residence in their district\* for at least 30 days before the general election

\*Note: Candidates for federal office are exempt; see Additional Qualifications for Specific Offices below.

### Major Party Candidates

- must have participated in the party's most recent precinct caucuses, or intend to vote for a majority of the party's candidates at the next general election

### Additional Qualifications for Specific Offices

#### UNITED STATES SENATOR

- must be an inhabitant of Minnesota when elected
- must be at least 30 years old upon assuming office
- must be a citizen of the United States for at least nine years upon assuming office

#### UNITED STATES REPRESENTATIVE

- must be an inhabitant of Minnesota when elected
- must be at least 25 years old upon assuming office

EXHIBIT D.2



- must be a citizen of the United States at least seven years upon assuming office

## GOVERNOR OR LIEUTENANT GOVERNOR

- must be at least 25 years old upon assuming office
- must be a resident of Minnesota for at least one year before the general election

## STATE JUDICIAL OFFICERS

- must be licensed to practice law in Minnesota

## STATE SENATOR OR REPRESENTATIVE

- must be a resident of Minnesota for at least one year before the general election
- must be a resident of their district for at least six months before the general election

## COUNTY SHERIFF

- must be licensed as a peace officer in Minnesota

## SCHOOL BOARD MEMBER

- must have not been convicted of an offense for which they are required to register as a predatory offender under *Minnesota Statutes 243.166*

Information about other qualifications for county, municipal, school district, or special district offices is available from the filing officer.

## Holding Two Offices at the Same Time

*Minnesota Statutes* provide that one person cannot hold certain combinations of offices at the same time, with a few exceptions. Review the *Compatibility of Offices* brief written by Minnesota House Research for more information on this topic.

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CORONAVIRUS

## Nur Omar Mohamed was 'Superdad' and mentor to many in Minneapolis Somali community

By Adam Belz (<https://www.startribune.com/adam-belz/6370450/>) Star Tribune

JUNE 19, 2020 — 10:29PM

Nur Omar Mohamed, the father of U.S. Rep. Ilhan Omar, was a mentor to many young people and a man whose support of his daughter's political ambition was unusual for his generation.

Mohamed died Monday of complications from COVID-19. He was 67.

Omar said Friday her father was "everything" to her and her siblings, and made what should have been a much more difficult life feel easier for his children.

"We all think of him as our shield," Omar said. "He wanted to shine a light of happiness in our lives and it feels right now that there's a shadow of darkness, and I don't know how long that stays."

A former civil servant in Somalia, Mohamed was both an elder in the Minneapolis Somali community and a "good man" who was very proud of his daughters, said Abdi Warsame, the former Minneapolis City Council member and head of the Minneapolis Public Housing Authority.

"He had a big laugh. He could speak Russian a little bit. He was up to speed on current affairs," Warsame said. "He was an elder, but more cosmopolitan than most."

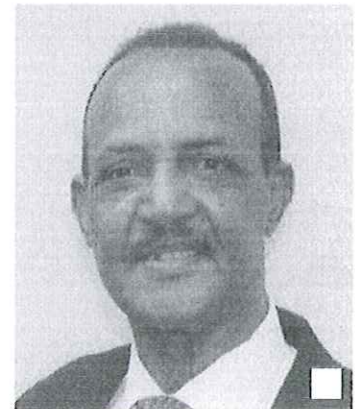
Mohamed was seen regularly walking or chatting on the streets in Cedar-Riverside where he lived. He spoke fluent Italian and Arabic, in addition to Somali, English and Russian. He returned to visit Somalia often.

He held several positions in civil service in the Somali government and worked for the postal service in Minneapolis after he came to the U.S. His nicknames in Cedar-Riverside were "Colonel" and "Superdad."

Mohamed had a "huge" concept of family and was a father figure to many people in Cedar-Riverside, said Abdirahman Kahin, the owner of Afro Deli.

"He was the father that everyone wanted to have," Kahin said. "Open-minded, listening, taking your phone number."

His support for his daughter's political career was a departure from the sensibilities of his generation.



"He was the father that everyone wanted to have."

EXHIBIT E

"The older generation, they don't really like women going into professions. He was the kind of man who always pushed his daughters to beat the odds," Kahin said.

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His wife, the mother of Ilhan Omar and Sahra Noor, worked outside of the home and owned a car in Somalia when the sisters were little.

"It was very untraditional in the way their relationship was and in the way that they chose to raise us," Omar said. "He was a feminist, I would say, before people really understood what that term was."

Mohamed's wife died when Omar was 2 years old. After Somalia descended into civil war, the family ended up in a refugee camp in Kenya and moved to the U.S. in 1995.

"For most people it would be hard to raise seven children, but he did it with ease, not only fulfilling a father's role but a mother's role," Omar said.

Mohamed was energetic, holding conversations on long walks and regularly walking to prayer at Masjid Rawdah, a mosque several blocks away from Cedar-Riverside on E. 26th Street, said Abdirizak Bihi, director of the Somali Education and Social Advocacy Center. "It sometimes would be difficult for me to catch up with him," Bihi said.

He was a "cool head" who emphasized the importance of understanding where your opponents are coming from, Bihi said, and he was a "soothing" conversationalist.

"He talked a lot about the art of listening," Bihi said. "He said when people are passionate about something, they argue about things, they cut each other off, and that's a problem."

Kahin and Bihi said Mohamed listened to young people and mentored them.

"He was always getting new ideas from young people," Kahin said. "His environment was young people."

Mohamed's survivors include seven children, including daughters Omar and Sahra Noor, and many grandchildren, including Omar's three children, Isra, Adnan and Ilwad Hirsi.

His children and grandchildren buried him Friday at the Garden of Eden Islamic Cemetery in Burnsville.

"He always said he was full of wealth because he got to see all of his children have children," Omar said. "I think that wealth was present today as we laid him in the ground."

Staff writer Faiza Mahamud contributed to this report.

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**Adam Belz** was the agriculture reporter for the Star Tribune.

adam.belz@startribune.com    612-673-4405    adambelz

-----Original Message-----

From: Elizabeth Lincoln <[elizabeth@lrl.leg.mn](mailto:elizabeth@lrl.leg.mn)>  
To: [sally4125@aol.com](mailto:sally4125@aol.com) <[sally4125@aol.com](mailto:sally4125@aol.com)>  
Sent: Fri, May 24, 2019 11:54 am  
Subject: RE: data request

Hello,

If information is widely available, we do not include sources. The 1981 birth year was widely available—in Wikipedia and the *Biographical Directory*--and so we added that birthdate without documentation. However, we document things if they are not widely available. I documented the change in birth year in a hidden field in our database but moved that note from a hidden field to the general notes field. That note says, "Her birth year is correct. It is incorrectly reported as 1981 in other sources. As of May 24, 2019, Rep. Omar's congressional staff are working with Wikipedia and the U.S. House to correct her birth year in those sources."

Feel free to contact Rep. Ilhan Omar's congressional office if you would like to verify this further.

Elizabeth Lincoln

From: [sally4125@aol.com](mailto:sally4125@aol.com) <[sally4125@aol.com](mailto:sally4125@aol.com)>  
Sent: Friday, May 24, 2019 11:12 AM  
To: Elizabeth Lincoln <[elizabeth@lrl.leg.mn](mailto:elizabeth@lrl.leg.mn)>  
Subject: Re: data request

Who did you receive a phone call from?

Also, does the Minnesota Legislature Library staff require documentation to support the data it provides?

-----Original Message-----

From: Elizabeth Lincoln <[elizabeth@lrl.leg.mn](mailto:elizabeth@lrl.leg.mn)>  
To: [sally4125@aol.com](mailto:sally4125@aol.com) <[sally4125@aol.com](mailto:sally4125@aol.com)>  
Sent: Fri, May 24, 2019 11:01 am  
Subject: RE: data request

There are no documents. We received a phone call on May 17<sup>th</sup> and we made a follow up call this morning.

Elizabeth Lincoln

**From:** [sally4125@aol.com](mailto:sally4125@aol.com) <[sally4125@aol.com](mailto:sally4125@aol.com)>  
**Sent:** Friday, May 24, 2019 10:58 AM  
**To:** Elizabeth Lincoln <[elizabeth@lrl.leg.mn](mailto:elizabeth@lrl.leg.mn)>  
**Cc:** Reference Desk <[refdesk@lrl.leg.mn](mailto:refdesk@lrl.leg.mn)>  
**Subject:** Re: data request

Elizabeth Lincoln,

Thanks!

Is there data concerning this? I would like the data Library staff received that indicated that her birth year was incorrect, including documents all emails, interoffice emails, texts etc.

Again, thanks.

Sally Ness

-----Original Message-----

**From:** Elizabeth Lincoln <[elizabeth@lrl.leg.mn](mailto:elizabeth@lrl.leg.mn)>  
**To:** [sally4125@aol.com](mailto:sally4125@aol.com) <[sally4125@aol.com](mailto:sally4125@aol.com)>  
**Cc:** Reference Desk <[refdesk@lrl.leg.mn](mailto:refdesk@lrl.leg.mn)>  
**Sent:** Fri, May 24, 2019 10:52 am  
**Subject:** RE: data request

Hello Sally,

The Legislative Reference Library's biographical record for Rep. Ilhan Omar's term in the Minnesota Legislature has the birth date for Rep. Omar as October 4, 1982. 1982 is her correct birth year.

On May 17, 2019, Library staff were informed by Rep. Omar's congressional staff that her birth year was incorrect and requested that we change it to 1982. Rep. Omar's congressional staff are working with Wikipedia and with the *Biographical Directory of the United States Congress* and other sources to correct her birth year on those sites. As of today, the birth year has not been corrected on the two sites I mentioned.

I contacted her congressional office this morning to verify that we do have the birth year correct. They confirmed that 1982 is the correct year.

Sincerely, Elizabeth Lincoln

Elizabeth Lincoln, Director  
Minnesota Legislative Reference Library  
645 State Office Building  
St. Paul, Minnesota 55155  
651-296-0594  
[elincoln@lrl.leg.mn](mailto:elincoln@lrl.leg.mn)  
<https://www.leg.state.mn.us/lrl/lrl>

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**From:** [webmaster@lrl.leg.mn](mailto:webmaster@lrl.leg.mn) <[webmaster@lrl.leg.mn](mailto:webmaster@lrl.leg.mn)>  
**Sent:** Thursday, May 23, 2019 1:53 PM  
**To:** Reference Desk <[refdesk@lrl.leg.mn](mailto:refdesk@lrl.leg.mn)>  
**Cc:** [sally4125@aol.com](mailto:sally4125@aol.com)  
**Subject:** data request

This is a copy of the message you submitted to the Minnesota Legislative Web Site.

Staff from the Minnesota Legislative Reference Library will contact you shortly.

Referring Page: No referring page

All data concerning the Minnesota Legislative Reference Library changing the birth year of Representative Ilhan Omar from 1981 to 1982. All emails, interoffice emails, texts etc.  
Thank you!

Sally Ness  
[sally4125@aol.com](mailto:sally4125@aol.com)