

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

ANGE SAMMA *et al.*, on behalf of
themselves and others similarly situated,

Plaintiffs,

v.

UNITED STATES DEPARTMENT OF
DEFENSE *et al.*,

Defendants.

Civil Action No. _____

DECLARATION OF ABNER BOUOMO

I, Abner Bouomo, hereby declare as follows:

1. I am a 24-year-old native and citizen of Cameroon.
2. I received an associate's degree in computer science from the Collège communautaire du Nouveau-Brunswick ("CCNB") in 2014.
3. In June 2017, I entered the United States on a Diversity Immigrant Visa. On July 2017, I received my Permanent Green Card.
4. On December 20, 2017, I enlisted in the United States Army. On that day, I signed an eight-year enlistment contract and took the oath of enlistment. I have reviewed the enlistment contract attached to the Motion as Exhibit 1 and believe that the main terms of my contract are substantially the same as those in that exhibit.
5. I currently serve on active duty as a Private First Class (E-3) and my military occupational specialty ("MOS") is small arms/artillery repairer.
6. I shipped to basic combat training ("BCT") at Fort Jackson, South Carolina in April 2019 and completed BCT in June 2019. I wanted to ship to BCT earlier but because I was a green card holder, I was required to complete my background check before I could ship to

BCT.

7. In April 2019, while undergoing in-processing at BCT, I requested my certification of honorable service (“N-426”) from a civilian Army employee. The civilian Army employee refused to help me obtain the N-426 certification and gave me a memorandum stating that soldiers have to wait until they report to their duty station to obtain the certification. The memorandum also stated that all soldiers are required to have the N-426 certified by an officer of O-6 pay grade or higher in their chain of command. Attached as Exhibit A is a true and correct copy of the memorandum I received at BCT.
8. I shipped to advanced individual training (“AIT”) at Fort Lee, Virginia in June 2019 and completed AIT in October 2019.
9. On or about July 2019, I asked my drill sergeant at AIT for the N-426 certification. My drill sergeant told me he would look into the process and later asked me to provide an N-426 for certification, which I did. In October 2019, as I was nearing graduation from AIT, I asked my drill sergeant about my N-426 and he told me he had not yet obtained the certification. On my last day of AIT, my drill sergeant returned an uncompleted N-426 to me and told me I would have to get it certified at my duty station.
10. I shipped to my duty station at Schofield Barracks in Hawaii on October 17, 2019, where I currently serve on active duty with the 25th Infantry Division.
11. In November 2019, I asked the non-commissioned officer above me in the chain of command to help me obtain my N-426 certification and he said he would send it up his chain of command. On January 2020, the S-1 office, which is responsible for military personnel matters, told me that I would have to serve one year before I would be eligible to receive the N-426 certification.
12. I understand that the Army is refusing to complete N-426 certifications for active duty

soldiers, like me, until they serve 180 days. However, the S-1 office at my duty station told me that I would have to serve one year on active duty before I could get my N-426 certification.

13. I also understand that the Army is requiring that an officer of O-6 pay grade or higher designated by the Secretary of the Army complete N-426 certifications.
14. Because I have not received a completed N-426 certification from the Army, I cannot apply for naturalization with United States Citizenship and Immigration Services (“USCIS”).
15. It has been 12 months since I began serving in an active duty status by shipping to BCT.
16. I have served honorably at all times since entering service.
17. I am not aware of any legitimate reason that would prevent the Army from certifying my honorable service.
18. I am not aware of any legitimate reason that would prevent USCIS from granting my naturalization application.
19. I am missing out on the benefits that come with U.S. citizenship, including the right to vote, right to sponsor immediate family members, and right to travel with a U.S. passport.
20. I would like to sponsor my mother, who currently resides in Cameroon.
21. I would also like to exercise the right to travel with a U.S. passport because my Cameroonian passport expired in December 2018, after my enlistment in the Army. In expectation of receiving my U.S. citizenship and a U.S. passport, I have not renewed it to date, as it would require me to travel to a Cameroonian embassy or consulate.
22. I hold an associate’s degree in computer science and would like to obtain a bachelor’s degree in this field and become an officer in the Army. To that end, I would like to apply to the Army’s Green to Gold Active Duty Option

Program, which would allow me to compete my bachelor's degree and earn a commission as an officer. However, I am unable to apply without U.S. citizenship. As an officer, I would receive a higher rank and pay grade.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on April 20, 2020.

A handwritten signature in black ink, appearing to read 'Abner Bouomo', with a long horizontal flourish extending to the right.

Abner Bouomo