

**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 AHMAD ISIAKA**

I, Ahmad Isiaka, hereby declare as follows:

1. I am a 26-year-old native and citizen of Nigeria.
2. In May 2014, I earned a bachelor's degree in electrical and electronics engineering from the Kwame Nkrumah University of Science and Technology in Ghana.
3. In July 2015, I entered the United States on an F-1 visa.
4. In August 2015, I began attending the University of Houston where I earned a master's degree in subsea engineering in December 2016.
5. From February 2017 to October 2017, USCIS granted me employment authorization through Optional Practical Training. In October 2017, I received an H-1B visa.
6. In February 2017, I moved to Columbus, Indiana, where I began working as an electronic controls engineer.
7. In July 2018, I obtained my Two-Year Green Card.
8. In February 2019, I moved to Humble, Texas, where I began working as a subsea engineer.
9. On January 17, 2020, 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.

10. I currently serve in the Selected Reserve of the United States Army Reserve as a Private Second Class (E-2) and my military occupational specialty (“MOS”) is motor transport operator.
11. I began drilling with the 644th Transportation Company in Houston, Texas in February 2020. I attended drills on February 8 and 9, 2020 and the Army compensated me for those drills.
12. I was supposed to attend additional drills in March 2020 but they were cancelled due to the COVID-19 pandemic.
13. On or about the end of February or beginning of March 2020, I requested my certification of honorable service (“N-426”) from my Unit Administrator. The Unit Administrator refused to help me obtain the N-426 certification and told me that I had not been serving long enough and that I would have to first attend basic combat and advanced individual training before I could receive the certification.
14. I understand that the Army is refusing to complete N-426 certifications for Selected Reserve soldiers, like me, until they serve one year.
15. 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.
16. 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”).
17. It has been two months since I began serving in the Selected Reserve by participating in Selected Reserve drills with my unit.
18. I have served honorably at all times since entering service.

19. I am not aware of any legitimate reason that would prevent the Army from certifying my honorable service.
20. I am not aware of any legitimate reason that would prevent USCIS from granting my naturalization application.
21. 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.
22. In particular, I would like to exercise the right to vote, especially as this is an election year. I would also like to sponsor my mother and father, who currently reside in Nigeria.
23. I would also like to obtain my U.S. citizenship so that I can apply to be an officer in the Army. I am eligible to be an officer because I have a bachelor's degree but I am unable to 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 15, 2020.



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Ahmad Isiaka