UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

ANGE SAMMA, et al.,)	
)	
Plaintiffs,)	
)	
v.)	Civil Action No. 1:20-cv-01104-PLF
)	The Honorable Paul L. Friedman
UNITED STATES DEPARTMENT OF)	
DEFENSE and LLOYD J. AUSTIN, in his)	
official capacity as Secretary of Defense,)	
)	
Defendants.)	
)	

DECLARATION OF SCOTT L. SEGGERMAN

Pursuant to 28 U.S.C. § 1746, I hereby declare as follows:

1.   I am currently a Program Manager for Data Assets at the Defense Manpower Data Center ("DMDC"). In this capacity, I am responsible for providing data to both internal and external customers to the Department of Defense ("DoD") to answer inquiries about Military and Civilian Personnel. In this capacity, I have access to many databases at DMDC representing various populations of both sponsors and dependents affiliated with DoD. I make this declaration based upon my personal knowledge, observation, and investigation of the matters set forth herein, as well as on information available to me in the course of my official duties.

2.   On October 14, 2021, consistent with my duties and responsibilities, I was tasked to run a query of the Defense Manpower Data Center's Person Data Repository. Specifically, I was asked to identify the number of noncitizen Active Duty Service members who began service between March 1, 2021 and August 31, 2021. Further, I was asked to identify the number of noncitizen National Guard and Reserve Component Service members who began service between September 1, 2020 through August 31, 2021.

3.   I ran the query as instructed and my results were as follows:

Active Duty noncitizens who began service from March 1, 2021 to August 31, 2021	Active Duty	2,102
Noncitizen National Guard and Reserve personnel who began service from September 1, 2020 to August 31, 2021	Guard Reserve	1,146 1,209

I declare under penalty of perjury that the foregoing is true and correct. Executed on October 15, 2021.

SEGGERMAN.SCOTT.L ▮▮▮▮
▮▮▮▮▮▮▮▮

Digitally signed by
SEGGERMAN.SCOTT.L.▮▮▮▮
Date: 2021.10.15 13:00:10 -07'00'

Scott L. Seggerman

2