

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

ANGE SAMMA, *et al.*, )  
)  
Plaintiffs, )  
v. ) Civil Action No. 20-cv-01104-PLF  
)  
UNITED STATES DEPARTMENT OF )  
DEFENSE, *et al.*, )  
)  
Defendants. )  
\_\_\_\_\_ )

**DECLARATION OF LTC ADAM W. GREIN, II**

I, LTC Adam Grein, U.S. Army, do hereby declare as follows:

1. I am the Commander of Headquarters, 120th Adjutant General Battalion (Reception), at Fort Jackson, South Carolina. I have been in this position for 1 year and 3 months since July of 2020. Prior to this position, I was assigned to Adjutant General School at the Soldier Support Institute and served as Chief of Proponent and Leader Development. My current duties include command and management of reception, staging, and integration of more than 45,000 civilians annually into Initial Entry Training for the US Army. This includes synchronizing service and support from 23 installation agencies, such as medical, logistics, finance, personnel and legal service support. This unit includes seven companies responsible for Reception Operations, Fitness Training & Rehabilitation Recovery, as well as Separation Operations for those trainees who are unable to complete training for a variety of reasons.

2. I am aware of the claims and allegations in the above-entitled litigation, and I am aware of the court's August 25, 2020 Order, concerning the processing of USCIS Forms N-426. Furthermore, my subordinate commanders are also aware of these actions and their responsibilities and obligation to support Soldiers requesting the N-426 Statement of Service.

The statements herein are based on my personal knowledge and information available to me in the course of my official duties.

3. Upon arrival to Fort Jackson, Soldiers begin their on-boarding experience here in the 120<sup>th</sup> AG BN (REC) in our Initial Receiving Branch. During this time Soldiers are arrived in the Army system of record Reception Module (RECMOD) and have their identity verified; additionally, we review their records and address any questions or concerns a Soldier might have during their first day of in-processing. This would include questions on citizenship, adding dependents or questions on receiving pay and allowances.

Additionally, during their third day of in-processing, company leadership hold a regulatory required meeting called Moment of Truth (MOT). At the MOT Soldiers are afforded an opportunity to come forward with any issues or topics they want addressed before starting training. During this time we do receive questions regarding naturalization. My commanders are knowledgeable of the process and provide Soldiers with a detailed description of how the process flows. Following the MOT, reception company commanders document all issues/requests Soldiers bring forward and then provide those requests for information or assistance to the Basic Combat Training (BCT) Battalion and Company leadership.

At the end of the on-boarding process (3-5 days later), a master list of all Soldiers moving to the BCT Battalions is produced, and on that list, Soldiers eligible to receive an N-426, Request for Certification of Military or Naval Service, are identified by reception personnel and provided to the BCT Battalion command. This list is provided directly to the BCT's battalion Operations Officer (S3), Personnel Officer (S1), and Battalion and Company Commanders to ensure those leaders know these Soldiers are in their formations and will require support to receive an N-426.

4. OPEN DOOR Policy: I, as well as my subordinate commanders, have open door policies which state all personnel assigned to this command (Soldiers, Civilians as well as family members) have the right to have their issues or concerns addressed by their commanding officer. Rarely do I have trainees request to see me; however, my company level commanders see trainees via the open door policy daily. These junior commanders address a number of concerns on behalf of trainees. Soldiers arriving for training come with a wealth of information from Recruiters, friends, family or other service members – many of which arrive knowing of open door policies as well as how to engage the Inspector General’s office, Equal Opportunity, and Chaplain in order to address issues and concerns. Additionally, while serving in 120<sup>th</sup> Soldiers receive briefings by the Inspector General’s team on what their office does in support of them and how to contact them.

5. HOTLINE/PHONELINE: As a safety concern, there are safety phones located throughout this battalion as well as in BCT Battalion. These phones are dedicated lines that link Soldiers directly to the Inspector General, Equal Opportunity, Chaplain and SHARP Advocates. These phones cannot be used for personal phone calls and cannot be dialed into – ensuring their accessibility 24 hours a day. These lines are regularly used and have an automated guidance that helps direct the caller to the right office to address their issues or concerns. In my battalion, these phones are inspected weekly and if found to be inoperable, they are placed on work order and due to the importance of these phones, they are given priority status and must be fixed within 24 hours.

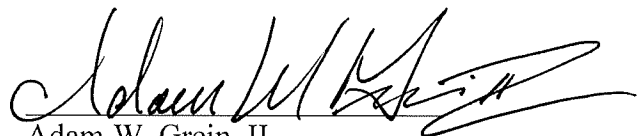
6. A best practice currently in use in the 193<sup>rd</sup> Infantry Brigade here at Fort Jackson, is to provide a list of Soldiers who are eligible for N-426 certification to the 193<sup>rd</sup> Brigade Legal team who then sends a representative to the BCT Battalion during the first week of training. The

representative from the legal team then provides all eligible Soldiers with a briefing outlining their right to request N-426 statement of service and initiates the N-426 at that time. From the time the form is initiated to the time the Brigade Commander signs the N-426 is roughly 5 duty days. It is important to note, that this is a mandatory briefing for all Soldiers eligible to receive a N-426 statement of service – regardless if they plan to request a statement or not.

Outside of the formation channels addressed above, Soldiers frequently communicate issues and challenges to family members who in turn communicate issues on behalf of their Soldiers to the Army. Many of the requests for information or support I receive generally come from the Post Public Affairs Office or directly from the Commanding General's office. In response to these requests I have personally called family members, mothers and fathers on a multitude of requests on behalf of their Soldiers, and I take each of these requests seriously. As the son of a South American Immigrant from Panama, I feel honored to support any person who is willing to serve, fight and defend this nation in achieving full citizenship.

Pursuant to 28 U.S.C. § 1746(2), I declare under the penalty of perjury that the foregoing is true and correct.

Executed on 14 October, 2021

A handwritten signature in black ink, appearing to read "Adam W. Grein, II". The signature is fluid and cursive, with a prominent initial "A" and "G".

Adam W. Grein, II  
Lieutenant Colonel, US Army