

**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.

No. 20-cv-1104-PLF

DECLARATION OF SHUAI ZONG

I, Shuai Zong, hereby declare as follows:

1. I am a 31-year-old native and citizen of China.
2. In July of 2013, I entered the United States on an F-1 visa.
3. On March 30, 2018, I enlisted in the United States Army. On that day, I signed an eight-year enlistment contract and took the oath of enlistment.
4. I currently serve on active duty as a Specialist (E-4) and my military occupational specialty is 11B, Infantryman.
5. I shipped to One Station Unit Training ("OSUT") at Fort Benning, Georgia on April 12, 2021.
6. On April 12, 2021, my attorney, Margaret Stock, requested my certification of honorable service ("N-426 certification") from the U.S. Army Reserve (USAR) 117th Legal Operations Detachment via email. A Sergeant First Class ("SFC") attached to the 117th Legal Operations Detachment refused to help obtain my N-426 certification, claiming that the request was sent to the wrong USAR Detachment. The N-426 certification request was then forwarded to the 128th Legal Operations Detachment via email.

7. A Staff Sergeant (“SSG”) assigned to the 128th Legal Operations Detachment notified the SFC that the 128th Legal Operations Detachment would also be unable to help obtain my N-426 certification, due to not having access to my personnel records. The SSG then instructed Attorney Stock to contact my assigned unit. Attached as Exhibit A is a true and correct copy of this email.
8. On April 15, 2021, Mr. Linden St. Clair, the Assistant Deputy for Recruiting and Retention for the Deputy Assistant Secretary of the Army contacted Attorney Stock via email. Mr. St. Clair advised Attorney Stock to contact the Legal Assistance Office at Fort Benning and stated the Office would be expecting me.
9. At this time, I was attending OSUT and unable to leave training to visit the Legal Assistance Office.
10. On April 15, 2021, Attorney Stock contacted the Fort Benning Legal Assistance Office on my behalf and requested assistance with my N-426 certification.
11. On April 19, 2021, Attorney Stock was contacted by a civilian Legal Assistance Attorney in the Fort Benning Legal Assistance Office willing to assist in locating my current Brigade.
12. On April 29, 2021, Attorney Stock received an update from the civilian Legal Assistance Attorney, stating that I was in “fleet of foot” status because I had been a part of three Brigades in the past month, which complicated getting my N-426 certification. The civilian Legal Assistance Attorney then had to make a series of phone calls to Charge of Quarters duty desks and to S-1 shops in each Brigade. He finally “discovered” my current Brigade and reached out to the Brigade paralegal for assistance. Attached as Exhibit B is a true and correct copy of an email from the civilian Legal Assistance Attorney.
13. On May 21, 2021, Attorney Stock received a forwarded email chain in regard to

requesting my N-426 certification from the 197th Infantry Brigade from the civilian Legal Assistance Attorney at Fort Benning. A Corporal and Sergeant (“SSG”) were requesting the following documents in order to forward my N-426 form to a Colonel for certification: a completed N-426 form, a completed N-400, two forms of ID, proof of military service, and any police and court documents if I had been arrested. The SSG stated that the documents requested are required to send the N-426 form up to the Colonel for signature. Attached as Exhibit C is a true and correct copy of this email.

14. On May 21, 2021, Attorney Stock supplied the requested documentation to the civilian Legal Assistance Attorney.
15. On June 1, 2021, I received my N-426 certification.
16. Until I received my N-426 certification from the Army, I could not apply for naturalization with United States Citizenship and Immigration Services (“USCIS”)
17. By the time I received my N-426 certification, it had been over two months since I began serving in an active duty status by shipping to BCT.
18. By the time I received my N-426 certification, it had been over two months since I first requested my N-426 certification.
19. I have served honorably at all times since entering service.
20. I am not aware of any legitimate reason that would prevent USCIS from granting my naturalization application.

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

Executed on June 25, 2021.



Shuai Zong