

**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 NORRIS NTAMBWA**

I, Norris Ntambwa, hereby declare as follows:


1. I am a 34-year-old native and citizen of the Democratic Republic of the Congo.
2. In May 2014, I entered the United States on a student visa.
3. In 2017, I obtained my Two-Year Green Card.
4. On February 4, 2021, I enlisted in the United States Army. On that day, I signed an eight-year enlistment contract and took the oath of enlistment.
5. I currently serve in the Selected Reserve of the United States Army Reserve as a Private First Class (E-3) and my military occupational specialty is Motor Transport Operator (88M).
6. I shipped to basic combat training (“BCT”) at Fort Jackson, South Carolina on March 8, 2021 and graduated from BCT on May 20, 2021.
7. While at BCT reception, I asked my drill sergeant about obtaining U.S. citizenship as a service member. My drill sergeant informed me that I could not begin the citizenship process while at BCT and that I would have to wait until I shipped to advanced individual

training (“AIT”).

8. I shipped to AIT at Fort Leonard Wood, Missouri on May 21, 2021 and graduated from AIT on July 16, 2021.
9. During my second week at AIT, I asked my drill sergeant about obtaining U.S. citizenship as a service member. My drill sergeant informed me I had to wait until I completed AIT and began service with my unit to begin the citizenship process. About a week later, my drill sergeant approached me and clarified that I was not eligible to begin the citizenship process because I had not yet served for one year.
10. I currently serve with the 217th Transportation Company in San Antonio, Texas. I attended drill in August, September, and October 2021 and the Army compensated me for these drills.
11. During my most recent drill, on October 16–17, 2021, I asked a drill sergeant about obtaining U.S. citizenship as a service member. The drill sergeant informed me that he would look into the process and come back to me. I have not heard back from this drill sergeant.
12. It has been over seven and a half months since I began my service by shipping to BCT and first requested my N-426 certification.
13. 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 October 25, 2021.

  
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Norris Ntambwa