

**DECLARATION OF ARMY SPECIALIST JUNFEI GE**

Pursuant to 28 U.S.C. § 1746, the undersigned hereby declares as follows under penalty of perjury:

1. My name is Junfei Ge. I am a Specialist in the U.S. Army and I submit this declaration to provide valuable background information in opposition to the Defendants' attempt to dismiss some of the claims in my lawsuit and send the case back to an agency where it has languished for several years.
2. I first entered the United States on December 28, 2011, in F-1 student status so that I could proceed with my higher education.
3. As I pursued my education, I became aware of various immigration opportunities that would open up for me after graduation.
4. I could have worked after graduation on Optional Practical Training or any number of work visas like the H-1B. I also could have pursued a Lawful Permanent Resident "green card" through employer sponsorship, or perhaps even on the basis of my own skills.
5. However, I discarded all those options as soon as I heard about MAVNI.
6. During my time in the U.S., I developed a great affinity for the country. I loved the idea of joining the military under MAVNI and providing "vital" skills to the Armed Forces. Since there were many other immigration options I could have pursued, I placed particular stock in the expedited citizenship I was assured. I made the decision to enlist based primarily on that assurance.
7. I enlisted in the U.S. Army under the MAVNI program in November 2015 and reported for active duty on May 17, 2016.

Exhibit 2

8. I was nervous about giving up my F-1 status, but believed that I would be quickly naturalized as promised.

9. However, that never happened.

10. I filed my N-400 Application for Naturalization—including my N-426 Certification of Honorable Military Service—on May 25, 2016.

11. I was interviewed on July 13, 2016, and passed the required tests. For some reason, I was scheduled for another interview in May 2017. I passed the required tests again.

12. On July 5, 2017, I finally received the email I had been waiting for. I had been scheduled for my naturalization oath ceremony to occur on July 25, 2017. The oath ceremony is where you are officially sworn in as a U.S. citizen.

13. My hopes were dashed just a few days later when the oath ceremony was cancelled.

14. Since then, everything has been on hold and every day gets worse.

15. Without my U.S. citizenship, I have never been able to provide the “vital” skills I was recruited for under MAVNI. While I am happy to be of service, I have only been able to perform low-level duties such as photography, coordinating our Facebook page, and cooking.

16. I also am unable to sponsor my wife for Lawful Permanent Residence. My wife has studied here in F-1 status and is nearing completion of her authorized Optional Practical Training. We face potential prolonged separation if I am unable to sponsor her, and I need my U.S. citizenship for that.

17. Even more disturbing is the fact that **I currently have no immigration status.** If I leave Fort Lee or any other military post where I’m assigned, I can be taken into immigration

custody and deported. I am literally captive to this entire process. The options that were available to me before are no longer available.

18. As this process has drawn on, I have had more and more time to think about my situation and have come to grow very fearful if I were forced to return to China. Due to escalating hostilities between our countries, I may be singled out for persecution in China as a former member of the U.S. military. While I continue not to believe that the U.S.—a country I love and to which I have given so much—would treat me this way, the longer this naturalization process drags out and the more the U.S. government fights my case, the more concerned I become.
19. I filed this lawsuit so that I can—at long last—get the citizenship I enlisted for, I qualify for, and that I believe I heartily deserve. Please help me so that my life is no longer at the whim of agency bureaucrats.

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

Executed on date: April 15, 2019

  
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Junfei Ge