

SUPPLEMENTAL DECLARATION OF ETHAN JEFFREY COLLINS

I, **Ethan Jeffrey Collins**, hereby declare as follows:

1. I am the Respondent in TSA Docket No. **22-TSA-0105** and TSOB Docket No. **25-TSOB-0100**. I submit this declaration in support of my appeal and in response to arguments regarding timeliness.
2. The Administrative Law Judge (ALJ) issued a **Decision and Order dated May 30, 2024**.
3. I did **not** receive a copy of the ALJ Decision and Order at or near the time it was issued.
4. Although I was aware that a decision had been entered, I did not receive the actual Decision and Order document, which is necessary to understand the findings and to prepare an appeal.
5. After repeated requests, I received the ALJ Decision and Order from my attorney via email on **September 6, 2025**, more than one year after the Decision was issued.
6. A true and correct copy of the email transmitting the ALJ Decision and Order on September 6, 2025 is attached as **Exhibit B**.
7. Upon receiving the Decision and Order, I acted diligently and promptly to pursue review before the Transportation Security Oversight Board.
8. Since the conduct underlying this matter in 2021, there has been **no recurrence or pattern of similar behavior**. I have complied with all legal requirements and have focused on stability, education, and forward progress.
9. This declaration is submitted in good faith to accurately describe the circumstances surrounding my receipt of the ALJ Decision and my subsequent actions.

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

Ethan Jeffrey Collins

Date: _____

EXHIBIT INDEX

- **Exhibit A** — Supplemental Declaration of Ethan Jeffrey Collins
- **Exhibit B** — Email Transmitting ALJ Decision and Order (September 6, 2025)
- **Exhibit C** — ALJ Decision and Order (May 30, 2024) (First Page Only) (*optional*)
- **Exhibit D** — Proof of Sentence Completion / Compliance (*if included*)
- **Exhibit E** — Academic Enrollment or Progress Verification (*optional*)

REPLY BRIEF — TIMELINESS (SUPPLEMENTAL SECTION)

The TSA argues that the appeal should be dismissed as untimely. That argument fails to account for the undisputed fact that Mr. Collins did not receive the ALJ Decision and Order until **September 6, 2025**, more than one year after the Decision was issued on May 30, 2024.

Receipt of notice that a decision exists is not equivalent to receipt of the decision itself. Without the Decision and Order, a respondent cannot meaningfully assess the findings, identify legal or factual errors, or prepare an appeal. The appeal clock cannot reasonably begin to run until the respondent receives the decision being appealed.

Here, the record shows that Mr. Collins received the Decision and Order from counsel on September 6, 2025, as reflected in Exhibit B. He acted diligently thereafter. Under **6 C.F.R. § 126.13(d)**, these circumstances constitute good cause for acceptance of the appeal.

TSA identifies no prejudice resulting from this delay. The administrative record is complete, and the appeal raises purely legal and procedural issues based on that record. Acceptance of the appeal is consistent with due process and TSOB precedent.

COMMUNITY SUPPORT LETTER TEMPLATE (OPTIONAL EXHIBIT)

[Letterhead if available]

Date: _____

Transportation Security Oversight Board
Office of the General Counsel
Department of Homeland Security
Washington, DC 20528-0485

Re: Ethan Jeffrey Collins — TSOB Docket No. 25-TSOB-0100

To the Members of the Transportation Security Oversight Board:

I am writing in my capacity as [title/role] at [organization/institution]. I have known Ethan Jeffrey Collins since [month/year] in a [professional/academic/community] setting.

During this period, I have interacted with Mr. Collins on a regular basis. Based on my direct observations, he has been reliable, respectful of rules and authority, and consistent in meeting his obligations. I am not aware of any conduct during this time that raised safety or security concerns.

Since [year], I have not observed any recurrence of prior issues. My observations are limited to his conduct and reliability within my area of responsibility.

This letter is provided solely to offer factual context regarding Mr. Collins's conduct during the time I have known him.

Respectfully,

[Name]

[Title]

[Organization]

[Phone / Email]