

TRANSPORTATION SECURITY OVERSIGHT BOARD

WASHINGTON, D.C.

In the Matter of Ethan Collins

Docket No. 2025-TSOB-0100

SECOND SUPPLEMENTAL MEMORANDUM

New Evidence of Phone/Account Access During Incarceration

FROM: Ethan Collins

SUBJECT: Additional Evidence of Potential Tampering with Phone Evidence

DATE: April 26, 2026

1. **New Evidence.** After my supervised release ended, I logged into my ForeFlight account and discovered two flights automatically logged while I was in federal custody/prison:

- June 11, 2021: Flight from LTBJ (Izmir, Turkey) to near Kayseri, Turkey.
- April 19, 2021: Flight from TIST (St. Thomas, USVI) to near 24.96°N / 76.69°W (Bahamas area).

Screenshots of the ForeFlight track logs are attached. I also received confirming messages from ForeFlight showing account activity during my incarceration.

2. **Implications.**

My access to these accounts was restricted during supervised release. The phone was supposedly in FBI/CBP evidence lockup following the January 29, 2021 search and my February 8, 2021 arrest. ForeFlight background tracking requires the device to be powered on with GPS access. These logs occurred while I was incarcerated, indicating the phone was either not properly secured, accessed, or used by someone while in custody. This breaks the chain of custody and raises serious questions about the reliability of all data extracted from the phone, including the statements used in the polygraph, the search warrant, and the original TSA security threat determination.

3. **Relevance to the Appeal.**

The TSA determination and ALJ decision relied heavily on evidence tied to the

phone. This new evidence supports my earlier arguments regarding unreliable statements and edited transcripts, and calls into question the integrity of the entire administrative record.

Addendum: Attached is a screenshot from my ForeFlight account clearly showing the two logged flights during my incarceration (June 11, 2021 and April 19, 2021), along with confirming messages from ForeFlight and FltPlan.

I respectfully submit this supplemental evidence for the Panel's consideration.

Respectfully submitted,

/s/ Ethan J. Collins

Ethan J. Collins

CERTIFICATE OF SERVICE

I certify that on April 26, 2026, copies were served via email on TSAOCCSTAO@tsa.dhs.gov and TSOB_docket@hq.dhs.gov.

Attachments: ForeFlight screenshots, track log details, confirming messages from ForeFlight and FltPlan, and the provided photo of the flight logs.