

**DECLARATION OF TRAVIS JOHN COLLINS, ATTORNEY FOR Y.S.M.**

I, Travis John Collins, declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the following is true and correct to the best of my knowledge and belief:

1. I am an immigration attorney in Arlington, Virginia. My practice focuses on removal defense. I represent Y.S.M. in his immigration proceedings.
2. Y.S.M. is currently detained at the Immigration and Customs Enforcement (“ICE”) Bluebonnet Detention Facility in Anson, TX, which is owned by Jones County, TX, and operated by MTC.
3. Y.S.M. is a citizen of Venezuela who was born in 2006. He entered the United States in 2022 as an unaccompanied minor.
4. Once in the United States, Y.S.M. reunited with his father I.S.G. and other extended family. I.S.G. filed a timely asylum application and included his son Y.S.M. as a derivative.
5. On March 14, 2025, Y.S.M. was detained by immigration agents, along with other relatives. Y.S.M. was later questioned by immigration and federal agents about a photograph. The agents stated that the photograph, found on Facebook, proved the Y.S.M. was a member of Tren de Aragua and that one of the persons in the photograph had a gun. Y.S.M. pointed out to the agents that the gun in question was in fact a water pistol. I have seen and reviewed the Facebook photograph in question and have confirmed that the gun in question is a water pistol.
6. After Y.S.M. was detained, he was initially transferred to Farmville Detention Facility in Virginia. Y.S.M. was made to wear green clothing, which signified that officers alleged that he was a member of Tren de Aragua.
7. On April 11, Y.S.M. was told by staff at the detention facility that he needed to attend a medical checkup. Once Y.S.M. arrived to the checkup, he was met by agents who began interrogating him about his ties to Tren de Aragua and pressured him to admit that he was a member of Tren de Aragua. The agents asked Y.S.M. to sign a paper saying that he was a member of Tren de Aragua. Y.S.M. refused to sign any document and denied that he was a member of Tren de Aragua.
8. On the night of April 13, Y.S.M. and his father were transferred from Virginia. I was scheduled to have a video call with Y.S.M. on April 14 at 9:00 AM EST; at 7:11 AM, I received an email notifying me that the video call had been cancelled. After checking ICE Detainee Locator, I contacted the detention center and emailed ERO as an attempt to obtain his location.
9. Sometime between April 14-16, Y.S.M. was transferred to Bluebonnet Detention Facility, as was his father. On the night of April 16, I was made aware of his location and emailed a request for a video call. I received a follow-up to my request on April 17 in the afternoon.
10. During the night of April 17, I received notice through Y.S.M.’s father that Y.S.M. had been taken away by agents. Y.S.M. was taken to another room. The agents returned for Y.S.M.’s

belongings. As he passed by, Y.S.M.'s father could see through a window that Y.S.M. was crying. As Y.S.M. and the agents were passing, Y.S.M. held up a paper to the window. Another detainee who spoke English was able to read that the paper said "deportation." The country of removal was not visible. Because he has no final immigration order, the government could only be seeking to remove him under the AEA, not the immigration laws.

\_\_\_\_\_/s/ Travis John Collins\_\_\_\_\_

Executed this 17<sup>th</sup> day of April, 2025