

**SUPPLEMENTAL
APPENDIX**

APPLICANTS' SUPPLEMENTAL APPENDIX

Declaration of Ashley Harris (April 21, 2025) 1a

Declaration of Travis John Collins, Attorney for Y.S.M. and S.M.R
(April 21, 2025) 5a

DECLARATION OF ASHLEY HARRIS

I, Ashley Harris, declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct, to the best of my knowledge and belief:

1. I am a Staff Attorney at the American Civil Liberties Union of Texas and am one of the attorneys representing the Petitioners and putative class members in *A.A.R.P. v. Trump*, No. 25-cv-69-H (N.D. Tex.). I make this Declaration based upon personal knowledge, except where indicated.
2. As set forth below in greater detail:
 - a. In the early morning of April 18, 2025, a Bluebonnet Detention Center employee referred to two Venezuelan detainees as scheduled to “leave today;”
 - b. Venezuelan men at the facility were told they would be removed within less than 24 hours of receiving a notice, in English, designating them under the Alien Enemies Act;
 - c. At approximately 5:35 PM Central Time a bus loaded with men and a large van departed the facility, escorted by cars with police lights; at about 6:30 pm CT, as I was driving from Bluebonnet Detention Center toward Abilene, what appeared to be the same bus, van, and escort of cars passed me, headed in a direction back to Bluebonnet, consistent with news reports that men were loaded on buses and driven to the airport that night.
3. In the evening of April 17, 2025, my colleague, Sarah Corning, and I both drove to Abilene, Texas because we were notified that individuals held in the Bluebonnet Detention Center in Anson, Texas, who are putative class members in the *A.A.R.P.* case, might be imminently deported under the Alien Enemies Act.
4. We arrived at the Bluebonnet Detention Center the next morning, on April 18, 2025. Upon arrival, we requested to speak with 10 individuals, one of whom is an *A.A.R.P.* named Petitioner and the rest of whom are putative class members in *A.A.R.P.* We were told by the detention center employee working at the front desk that two of the individuals we wanted to speak to, YJSM and FGM, were scheduled to “leave today” and “leave soon.”
5. Around 8:00 AM Central Time, I saw approximately 15-20 people walk into the detention center in a group. They were wearing clothing that identified them as ICE personnel.
6. Over the course of the day, we spoke with the one named Petitioner and nine putative class members. The detained individuals we spoke with were all Venezuelan and had all been accused of being in Tren de Aragua, despite firmly maintaining that they have no connection with Tren de Aragua.

7. Of the ten individuals we spoke to, four people—YJSM, FGM, SMR, RJRS—told us they had recently received AEA removal notices from the officers in the detention center. All four individuals showed us the notices, which stated that the named individual would be deported pursuant to the Alien Enemies Act. The four individuals explained that, because the notice was only in English, they could not read it. The officers who gave these men the notices did not offer any translation of the notice into a language they could understand (Spanish). However, the officers told the men they would be deported. The officers told the men that they would be deported whether or not they signed the notice.
8. YJSM stated that when he was given the notice in the afternoon or evening of Thursday, April 17, 2025, the person who gave him the notice told him he would be deported within 48 hours. Separately, a staff member at the detention center told him he would be deported before the sun rose on Saturday, April 19, 2025.
9. YJSM further stated that when he and other individuals were given the notices, they were taken into another dorm full of men who also had been given the notices. That dorm that YJSM was taken to included approximately 30-50 individuals. YJSM said everyone in this new dorm had been told they were being deported. No one would tell them where they would be deported to.
10. FGM stated that when he was given the notice on Thursday, April 17, 2025, the officer told him that he would be deported in the evening the next day, April 18, 2025.
11. FGM further stated that throughout Friday, April 18, 2025, more and more individuals were receiving the notices and being told that they would be deported “under the President’s law.” He estimated around 100 people were given the notices and told something similar about the notices and deportation.
12. SMR stated that when he was given the notice in the morning of Friday, April 18, 2025, the officer told him he may be deported that night.
13. RJRS stated that when he was given the notice the morning of Friday, April 18, 2025, he was told to prepare by gathering his things. He saw multiple people being given notices and taken from the dorms on Thursday, April 17, 2025. On Friday, April 18, 2025, he saw what he thought were ICE officers arrive and give notices out to around 30 people.
14. The other six individuals we spoke to were afraid that they would be given the notice documents and similarly be told that they would be deported imminently. They had seen other people receive the notices and be removed from their dorms.
15. Around 3:40 PM Central Time, I walked outside of the Bluebonnet Detention Center. As I walked out, I saw that detainees were being taken from the building onto a bus on the left side of the building. Over the course of the next ninety minutes, my colleague and I counted at least 36 people who were taken onto the bus. I do not know if people were loaded on the bus before I started observing it or how many were loaded on, because I was inside the detention center. I estimate that the bus, which was marked “MCI,” could

fit around 60 people. There was at least one van parked near the bus as well. I am including pictures of vehicles I saw below.

16. Around 5:10 PM Central Time, I saw the bus doors close and, along with the van, drive away from the building and wait just inside the gate surrounding the property.
17. Around 5:35 PM Central Time, I saw the bus and smaller vehicle drive away from the detention center. Around 5:40 PM Central Time, I saw approximately 10-15 cars with police lights flashing drive away from the detention center parking lot and in the same direction as the bus and the van. There were two other people watching and recording the bus during this time, one of whom told me she was a reporter from NBC. I saw both of them drive away in the direction of the bus immediately after it left. At the end of this declaration are copies of photographs of the bus, van and cars with police lights that left the detention facility.
18. Around 6:30 PM Central Time, I was driving south on Interstate 277 away from the Bluebonnet Detention Center towards Abilene, when I saw what appeared to be the same bus marked "MCI" and the same van I observed earlier, driving northbound in the direction of the Bluebonnet Detention Center. The bus and van were surrounded again by approximately 10-15 cars with police lights flashing. I did not take photographs because I was driving.
19. I believe the closest, and only nearby, commercial airport to the detention center is the Abilene Regional Airport, the airport in Abilene, Texas. Based on the direction of travel for the bus and van, and the accompanying cars with police lights, I believe that the vehicles were traveling from the detention center toward the Abilene airport when I first observed them at the detention center, and that the vehicles were returning in the other direction when I later observed them on Interstate 277.





Executed this 21st day of April, 2025 in San Antonio, Texas.

/s/ Ashley Harris
Ashley Harris

