UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

Caryelis B.B.B., *Petitioner*, v. Pamela Bondi, *et. al*, *Respondents.*	**DECLARATION OF MARY ALEXANDER IN SUPPORT OF EMERGENCY PETITION FOR HABEAS CORPUS** Case No. 26-cv-00917 (DWF/SGE)

STATE OF MINNESOTA)
) ss.
COUNTY OF HENNEPIN)

1. My name is Mary Alexander.

2. I am the Manager of Curriculum and Training at Tierra Encantada, which is an early childhood education center located in Minneapolis.

3. I have spoken with people who have been detained with Caryelis B.B.B., the Petitioner in this matter, on multiple occasions over the past several days.

4. Caryelis was detained by ICE on January 31, 2026. ICE agents broke windows to her car and she was forcibly removed from it by the agents, causing injuries.

5. On February 3, 2026, I spoke to a person who was with Caryelis at the Whipple Building in St. Paul. Since her detention, four days earlier, Caryelis had received nothing to eat except a couple of apples. She was still covered in blood and glass from her car window. She was very cold and very hungry.

6. On February 4, 2026, I learned that Caryelis had been transported to Crow Wing County jail.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Signature: s/ Mary Alexander