

Exhibit A:

Timeline

Detailed Timeline of Events

November 21, 2018 (Wednesday):

- 8:32 a.m. Mr. Ramos-Gomez is arrested for an incident at Spectrum Hospital where he allegedly trespassed on the helipad after damaging a keypad. There is scorching under a sprinkler and some burnt items are found in his backpack.
- The forms of identification Mr. Ramos Gomez had with him when he was arrested according the Grand Rapids Police Department Police Report and his Inventory Property List stored at the GRPD included his:
 - U.S. passport-- which states that he was born in Michigan;
 - U.S. Marine Corps “dog tags”; and
 - Real ID-compliant driver’s license (which one cannot obtain unless one is lawfully present in the United States) that also identified him as a veteran.
- 11:42 a.m. - 11:55 a.m. GRPD Sgt. Griffin and Lt. Rogers interview Mr. Ramos-Gomez at the GRPD Detective unit. Sgt. Griffin texts with FBI agent Austin that the case involves “Vet, PTSD, But not a FBI issue.”
- 12:30 p.m. GRPD posts on the GRPD Facebook account about the arrest at Spectrum Health, noting that there was “minimal damage” and “no additional concern for danger.”
- 12:34 p.m. The GRPD issues a press release about an arrest at Spectrum Health, noting that there was “minimal damage” and “no additional concern for danger.”
- 3:51 p.m - 4:45pm. Lt. Kristen Rogers sends an email requesting an update on the following morning about the charges issued against Mr. Ramos Gomez and any special bond conditions. After one officer indicates that he is unable to follow up until Friday, November 23, Lt. Rogers assigns follow up to Det. Adam Baylis, who can respond the following morning.
- 4:02 p.m. A “Shift Summary” is sent to all sworn GRPD personnel. It contains information about the arrest of Mr. Ramos-Gomez, and includes his name and date of birth. The shift summary also states that “The Grand Rapids Police Department’s Detective Unit has taken custody of the suspect and is currently investigating the incident.”
- 5:00-6:00 p.m. According to the Internal Affairs report, Captain Vanderkooi stated that he saw reports regarding Mr. Ramos-Gomez’s arrest during either the 5:00 pm or 6:00 evening news. Either way, at 6:02 pm, Wood TV 8 airs an interview of Sergeant Dan Adams detailing the arrest, and names Mr. Ramos Gomez. *See* <https://www.woodtv.com/news/grand-rapids/suspect-arrested-after-hospital-incident->

[in-gr/1611179571](https://www.in-gr/1611179571). The story includes his booking photo, in which Mr. Ramos Gomez is recognizably Latino, and uses his last name, which is Latino as well.

7:40 p.m. Captain VanderKooi, who is off-duty and watching the news at home, sends an email to Derek Klifman, an ICE officer who works for a unit of ICE responsible for deportations of immigrants with criminal convictions. Captain VanderKooi's email asks: "Could you please check his status?" The description of the arrest from the "Shift Summary" is pasted into the message. Although the shift summary states that the GRPD Detective Unit "is currently investigating the incident," Captain VanderKooi claims that he did not consult anyone at GRPD regarding the status of the investigation before contacting ICE. According to the GRPD investigative report, Captain VanderKooi believed that Mr. Ramos-Gomez's actions were potentially related to terrorism. The report states that Captain VanderKooi's actions were motivated out of a concern that further investigation would not take place until Monday, November 26, 2018—at which point Mr. Ramos-Gomez might have already bonded out of jail.

November 22, 2018 (Thanksgiving):

1:08 am. Karen Johnson, whose email address indicates that she works for Kent County, sent the November 21, 2018 arrest log via email to ICE, the Department of Justice, and a "JBowman" (Joel Bowman of GRPD) from the City of Grand Rapids. The arrest log sent to ICE shows that the Grand Rapids Police Department is the arresting agency. It also shows that Mr. Ramos-Gomez's country of birth as "USA".

9:46-9:49 a.m. Det. Baylis, the assigned Detective presenting the matter to the Prosecutor for potential criminal charges, emails Lt. Rogers to update her about the charges authorized against Mr. Ramos-Gomez and the bond issued by Judge Distel. Det. Baylis calls Mathew Brinkman from Spectrum Health to update him on the status of the case and request an estimate of the cost of repairs. Det. Baylis also sends a follow-up email to Mathew Brinkman reiterating his request for an estimate of the cost of repairs

That morning Det. Baylis writes a report about his follow-up activities, including attaching video footage from the helipad at Spectrum to the case file.

November 23, 2018 (Friday):

6:27 a.m. ICE Officer Klifman forwards Captain VanderKooi's message without further comment to Matthew Lopez, a Deportation Officer with ICE's Enforcement and Removal Operations Division, which is responsible for deporting foreign nationals.

9:54 a.m. ICE Officer Lopez emails Captain VanderKooi about Mr. Ramos-Gomez: "I was able to interview that subject at Kent County this morning, and he is a foreign national illegally in the U.S. Thank you for the lead he will be coming into our custody when he is released from his criminal case. Let me or Derek know if you ever have any other good leads."

- Captain VanderKooi subsequently forwards that message to other GRPD officers upon returning to work on Monday.

November 26, 2018 (Monday):

9:27 a.m. Jana Forner, Grand Rapids Police Department, emails Det. Bayliss and informs Bayliss that “Capt. VanderKooi also mentioned he had been in contact with ICE about this guy. He was going to forward you his email conversation with them.”

9:32 a.m. Detective Bayliss responds to Officer Forner regarding a search of the interrogation video of Mr. Ramos-Gomez by Sergeant Griffin. Detective Bayliss was interested to see any statements Mr. Ramos-Gomez made to show his intent on November 21, 2018.

9:36 a.m. Upon returning to work, Captain VanderKooi forwards his email correspondence with ICE to Det. Baylis.

9:49 a.m. Captain VanderKooi emails ICE officer Matthew Lopez, copying ICE Officer Klifman and GRPD assigned investigator Det. Baylis. The subject line of the email is: “Spectrum Helicopter Pad Loco.” “Loco” is a Spanish language term meaning “crazy.”

- The email states: “It is not clear what mad intent was involved in this breach of hospital security but here is the report.” A copy of the police report (which noted that Mr. Ramos-Gomez’s passport was found on him when he was arrested) is attached.

1:27 p.m. — 3:40 p.m. Spectrum Security reports that the value of the damaged keypad is \$120.65, “So not even \$200” (which is necessary if Mr. Ramos-Gomez is to be charged with misdemeanor destruction of property over \$200, one of the charges previously authorized by prosecutor Daniel Helmer). Prosecutor Helmer responds: “Well, can we say labor to install and time spent to wipe off the soot?” Detective Bayliss responds “word.”

3:43 — 3:59 p.m. Det. Baylis forwards the message from ICE to Prosecutor Helmer, noting “Also looks like ICE will be taking custody upon release for a period of time...”

- Prosecutor Helmer immediately responds: “I am confused. Didn’t his property have a US Passport in it? And he was a veteran?!”
- Det. Baylis responds: “Who knows, not sure it was a US passport.... I am not sure about the vet thing.”

December 14, 2018 (Friday):

ICE takes Mr. Ramos-Gomez into custody when he is due to be released from the Kent County Jail, and transports him to immigration detention in the Calhoun County Jail.

December 17, 2018 (Monday):

Mr. Ramos-Gomez is released from Calhoun County Jail after intervention by his family's attorney.

January 18, 2018 (Friday)

Mr. Ramos-Gomez' attorneys obtain his personal items from the possession of the GRPD evidence locker, which contains numerous forms of identification establishing Mr. Ramos-Gomez is a United States citizen and Marine veteran.