

**IN THE COURT OF APPEALS
NINTH APPELLATE DISTRICT
LORAIN COUNTY, OHIO**

STATE OF OHIO,

Plaintiff-Appellee,

Case No. **14CA010555**

vs.

CLIFIDN JACKSON,

Trial Case No. **11CR083104**

Defendant-Appellant.

**AFFIDAVIT IN SUPPORT OF REQUEST FOR LEAVE TO FILE
APPELLANT'S APPLICATION FOR REOPENING OF HIS DIRECT
APPEAL UNDER APP.R.26(B) DELAYED AND HIS
ASSIGNMENTS OF ERROR I THOUGH VI**

Clifton Jackson #A652-163
Lake Erie Correctional Institution
501 Thompson Road
P.O. Box 8000
Conneaut, Ohio 44030

Mary Slanczka (0066350)
Assistant Prosecuting Attorney
The Justice Center, 3rd Floor
225 Court Street
Elyria, Ohio 44035

DEFENDANT-APPELLANT PRO SE

COUNSEL FOR APPELLEE

IN THE COURT OF APPEALS
NINTH APPELLATE DISTRICT
LORAIN COUNTY, OHIO

STATE OF OHIO,

Plaintiff-Appellee,

Case No. 14CA010555

vs.

CLIFION JACKSON,

Trial Case No. 11CR083104

Defendant-Appellant.

AFFIDAVIT IN SUPPORT OF REQUEST FOR LEAVE TO FILE
APPELLANT'S APPLICATION FOR REOPENING OF HIS DIRECT
APPEAL UNDER APP.R.26(B) DELAYED AND HIS
ASSIGNMENTS OF ERROR I THROUGH VI

I, Clifton Jackson, being first duly sworn according to the laws of the State of Ohio, depose and assert a sworn statement pursuant to App. R. 26(B)(2)(b) & (d) of the basis for the claim in support of Request for Leave to File Appellant's Application for Reopening of his Direct Appeal Delayed.

1. My name is Clifton Jackson, I have first-hand knowledge of and am competent to make the following statements.
2. I was unable to file my application for reopening of my direct appeal under App. R. 26(B) within 90 days of the Court of Appeals Decision and Journal Entry and give the following reasons in support with both the delay and Civil and Constitutional Rights violations:
3. The following is a detailed break down of the actual alleged traffic stop occurring on June 14th, 2011 and the following events to date as I remember.
4. This break down is per the hour, minute and second of the morning of June 14th, 2011 , entirely supported by audio & video [See Attached (Appendix of Exhibits), "A"], which is derived from Ohio State Trooper "Christopher Beyer's" (the pursuing and arresting officer) cruiser.
5. The audio & video starts at approx: **08:39:17**, which Trooper Christopher Beyer is narrating the alleged traffic infraction, Trooper Beyer was also communicating with LEADS.
6. At **08:40:04**, Trooper Beyer communicates to LEADS and initiate the alleged traffic stop.

CLIFTON JACKSON AFFIDAVIT AND APPENDIX OF EXHIBITS ARE NUMBERED [first two cover pages of affidavit unnumbered, III-IXIII] IN ROMAN NUMERAL. EXHIBIT PAGES ARE CROSS REFERENCED AS APPENDIX [Appendix Pages are numbered 1-655] PAGES. AFFIDAVIT AND EXHIBITS ARE IN SUPPORT OF 26B MOTION TO REOPEN STATE OF OHIO v. CLIFTON JACKSON, CASE NO. 11CR083104, NINTH DISTRICT COURT OF APPEALS CASE NO. 14CA010555, Not Limited Too.

7. At **08:40:35**, Trooper Beyer approaches my vehicle and asked where I was coming from, and where was I going? Then Trooper Beyer asked me for my driver's license and the vehicle 's credentials.
8. At **08:42:08**, once Trooper Beyer discovered I had New York driver's license [this area of the audio & video, not limited too, primarily supports Trooper Beyer committed perjury regarding alleged attempts of checking my drivers license, alleged reviewing of a rental agreement, and alleged detailed response from LEADS regarding its operational status prior to the K-9 alleged open air sniff, finding drugs and subsequently Trooper Beyer falsified arrest report authored June 14th, 2011, See Attached (Appendix of Exhibits), Exhibits "B & J", not limited too], Trooper Beyer immediately [with specific attention to Trooper Beyer's hands were clearly empty, **proof he never took my license or credentials**, not limited to the alleged rental agreement when] went back to his cruiser and called for K-9 Assistance at **08:42:20**, which Trooper Beyer received an immediate en route response.
9. At **08:42:30**, Trooper Beyer communicates to LEADS, unrelated to my vehicle, drivers license or alleged rental agreement (credentials).
10. At **08:45:30**, Trooper Beyer without any further request or attempts to obtain for the possibilities of review of my driver's license, the vehicle's credentials, or the alleged rental agreement, in addition without any further attempts to communicate to LEADS, and/or communications from LEADS, Trooper Beyer exit his cruiser, returns to my vehicle and at 08:45:40, immediately states: "everything checked out"(when no attempts were ever made at this point to check my driver's license etc., through leads), however, ordered me out my vehicle.
11. At **08:46:10**, I exit my vehicle and secured it (locked the my vehicle doors), which was confirmed by Trooper Beyer at my suppression hearing on June 4th, 2012, and trial testimony on February 11th, 2014.
12. At **08:46:45**, I was searched by Trooper Beyer, although unhand-cuffed, against my will I was striped of my liberty and placed and secured in the back of Trooper Beyer's cruiser.

CLIFTON JACKSON AFFIDAVIT AND APPENDIX OF EXHIBITS ARE NUMBERED [first two cover pages of affidavit unnumbered, III-IXIII] IN ROMAN NUMERAL. EXHIBIT PAGES ARE CROSS REFERENCED AS APPENDIX [Appendix Pages are numbered 1-655] PAGES. AFFIDAVIT AND EXHIBITS ARE IN SUPPORT OF 26B MOTION TO REOPEN STATE OF OHIO v. CLIFTON JACKSON, CASE NO. 11CR083104, NINTH DISTRICT COURT OF APPEALS CASE NO. 14CA010555, Not Limited Too.

13. There are several points I feel are critical to be clearly understood at this point in the illegal process, which are:
 - A. I clearly had the car keys and the vehicle car/alarm remote, and cell phones etc..
 - B. LEADS has been clearly operable, and no such LEADS transmissions have been made or associated to its operable status of alleged going out of or coming back into service the life of the stop thus far, nor were the alleged mere attempts to check LEADS were ever in fact made.
14. At **08:46:50**, once I was striped of my liberty and secured in the back of Trooper Beyer's cruiser, Trooper Beyer clearly radios and states "Turned off mic conversation, Trooper Beyer".
15. At **08:47:00**, I start a cell phone conversation.
16. At **08:47:55**, Ohio State Trooper "**Michael Trader**" and "K-9 Argo" comes into Trooper Beyer's cruiser's camera's view, B-lining straight to my alleged vehicle.
17. What is extremely important to point out is:
 - A. Trooper K-9 Argo was extremely high strung the entire time before, during and after the search, extremely paying immediate attentions to Trooper Trader's right hand, which started at the trunk moving counterclockwise.
 - B. Trooper K-9 Argo at no point starting from the trunk of the alleged vehicle paid any attention to the lower or mid portion of the vehicle.
 - C. Trooper Trader clearly keeps his right hand above waist level.
18. At **08:48:05**, Trooper Trader clearly reaches the driver's side rear door area, changes his physical posture, get Trooper K-9 Argo's immediate attention, lowers his right hand while tapping the lower rear door 2 to 4 times (this act is extremely illegal and very important to remember regarding the instant case). After a brief pause, Trooper K-9 Argo complies with the prompt

command, and starts to vigorously scratch the immediate area Trooper Trader alerted Trooper K-9 Argo to, at which point trooper Trader reaches into his back pocket to give Trooper K-9 Argo an object, which Trooper K-9 Argo went crazy for, and leap up to Trooper Trader's right hand where the object was still in his hand, and bit down on the object in a playful manner [receiving his reward for following Trooper Trader's alert command].

19. At **08:48:46**, Trooper Beyer re-approached me illegally detained in the back of his cruiser, and placed me under arrest and began to read me my Miranda Rights, but after Trooper Beyer realized that his mic was still turned off, he immediately turned it back on. Trooper Beyer alleges that Trooper K-9 Argo indicated on my vehicle and immediately took my keys and remote from me against my legal right and wishes.
20. At **08:50:20**, Trooper Beyer clearly walks away from his cruiser with my keys and remote to my secured (locked) vehicle, turns his mic off while he used the remote to unlock my vehicle.
21. At **08:50:30**, Trooper Trader lingered around my vehicle without touching it, until Trooper Beyer hit the remote, then Trooper Trader opened my passenger door, and although both Trooper Beyer and Trooper Trader stood at the open passenger door without a thought, superficial nor thorough desire to search it's interior.
22. At **08:51:00**, Trooper Beyer while walking toward the rear of my vehicle, used the vehicle alarm remote once again to unlock the trunk, removed the contents from the trunk and thoroughly searched the contents and trunk without ever searching the interior [inside] of my vehicle, and more importantly without requesting or obtaining a legal search warrant, required to legally search or enter my vehicle without consent, and the drugs found inside luggage secured in the trunk, was obtained illegally. [Trooper Beyer's mic remained turned off at this time].
23. At **08:54:00**, Trooper Beyer after illegally locating the drugs, re-approached me once again while I was still illegally detained in

the back of his cruiser, removes me from the cruiser, places handcuffs on me, and began searching me again, this time more thoroughly than the first time, while asking me if I would be willing to cooperate?

24. At **08:55:47**, Trooper Beyer realized his mic was still turned off, turns his mic back on, then asked if I would be willing to cooperate again? Even though I had already told him I had nothing to say.
25. At **08:56:00**, Once again I stated to Trooper Beyer I had nothing to say, meaning I did not wish to cooperate.
26. At **08:57:37**, Trooper Trader while on a cell phone, asked Trooper Beyer "what did you stop him for"?
27. At **08:57:39**, Trooper Beyer immediate response was "following to close".
28. At **08:59:20**, Trooper Trader (believed to be in violation of my Miranda Rights), again tried to get me to cooperate with them?
29. At **08:59:55**, Trooper Beyer completed his thorough search of my person.
30. At **09:00:07**, Once again, I stated to Trooper Trader I do not wish to cooperate.
31. At **09:00:45**, I was secured, handcuffed, arrested, and placed back into the back seat of Trooper Beyer's cruiser, yet Trooper Beyer left my cell phones in the back seat with me (purposely). So I resumed my cell phone conversation.
32. At **09:00:52**, Trooper Beyer started celebrating, stating in reference to me: "Got it, he went pass me and said, stop me, and I said OK".
33. At **09:01:03**, Trooper Beyer turned his mic back off, which from this point on, Trooper Beyer's mic officially remained off the life of the stop.
34. At **09:02:31**, Trooper Beyer and Trooper Trader are clearly and

visibly listening to my cell phone conversations.

35. At **09:32:39**, Troopers Beyer and Trader (again, believed to be in violation of my Miranda Rights), asked me where I got on the turnpike at?
36. At **09:34:26**, Trooper Trader (believed to be in violation of my Miranda Rights), asked me if I would be willing to deliver the cocaine?
37. At **09:34:31**, I refused to deliver the cocaine.
38. At **09:49:00**, Trooper Beyer returns too his cruiser.
39. At **09:49:10**, a tow-truck comes and towed my vehicle.
40. At **09:50:14**, Trooper Beyer pulls off, transporting me to the State of Ohio Trooper's Barracks, at which time I begun to question Trooper Beyer, but due to the fact his mic [body mic] was still off, you could hear me, but none of what Trooper Beyer responses.
41. At **09:51:00**, the audio & video was deliberately turned off by Trooper Beyer, well prior to reaching the State Trooper's Barracks.
42. After what appeared to be another 8 to 15 minute drive, we arrived at State of Ohio Trooper's Barracks, believed to be at the **Milan Post**, where Trooper Beyer pulls his cruiser inside a garage apart of the Barracks.
43. I was removed from the vehicle, searched again before entering the Barracks, then placed in a holding room adjacent to the primary desk locations for the Troopers and their Superiors. Also located in the corner of the barrack, was a wooden type stand, that housed various monitors. The walls were extremely thin, and the door where I was being detained had a window. So basically, I could hear and see everything going on without human or physical interference.

CLIFTON JACKSON AFFIDAVIT AND APPENDIX OF EXHIBITS ARE NUMBERED [first two cover pages of affidavit unnumbered, iii-ixiii] IN ROMAN NUMERAL. EXHIBIT PAGES ARE CROSS REFERENCED AS APPENDIX [Appendix Pages are numbered 1-655] PAGES. AFFIDAVIT AND EXHIBITS ARE IN SUPPORT OF 26B MOTION TO REOPEN STATE OF OHIO v. CLIFTON JACKSON, CASE NO. 11CR083104, NINTH DISTRICT COURT OF APPEALS CASE NO. 14CA010555, Not Limited Too.

44. **At approximately 11:55 A.M., even though I had invoked my right to remain silence and right to counsel previously while illegally detained on the Ohio State Turnpike on multiple occasions (which was confirmed by Ohio State Trooper Christopher Beyer, See Attached (Appendix of Exhibits), "J", Page 17, lines 11-17), while in this holding room, I was approached (again, believed to be in violation of my Miranda Rights), by two DEA TASK FORCE OFFICERS, officers "Geno Taliano" and "Caitlin SzczePinski" in hopes I would be willing to cooperate. I refused to cooperate and I also refused to sign the FORM DEA - 71. The DEA TASK FORCE OFFICERS immediately terminated there attempts to interview me. See Attached (Appendix In Support), Exhibit "D".**
45. The DEA TASK FORCE OFFICERS exit the holding room, and immediately informed the Troopers present at the Barracks [not limited too Trooper Beyer and Trooper Trader], that I refused to cooperate with their agency also. At which point Trooper Beyer immediate began pleading to with those DEA TASK FORCE OFFICERS to supersede Trooper Christopher Beyer arrest. The DEA TASK FORCE OFFICERS immediately went to the wooden type stand that housed various monitors, and immediately reviewed the live feed capabilities of both Trooper Beyer's and Trader's vehicles of the alleged traffic stop, and immediately declined to supersede Ohio State Trooper Christopher Beyer arrest and the desired charges. Now because of the amount of drugs, Trooper Beyer continued his plea for the DEA TASK FORCE OFFICERS to supersede his arrest and the desired charges, at which point [after reviewing the traffic stop via the live feed capabilities] the DEA TASK FORCE OFFICERS stated arrest would not last 15 seconds in a Federal Court. See Attached (Appendix of Exhibits), "D".
46. The DEA TASK FORCE OFFICERS [hereinafter "DTFO"] took possession of the illegally obtained evidence [the drugs, my cell phones, and my personal money etc.,]. Trooper Beyer, after falsifying the arrest report (See Attached (Appendix of Exhibits), Exhibit "B"), eventually transported me to a Municipal Court in the City of Vermilion, County of Lorain, State of Ohio. Where I was arraigned based under the known fact(s) of fraudulent content, and given a \$500,000.00 bail and ordered transported to the Lorain County Jail. Trooper Beyer transported me to the Lorain County Jail. While in route Trooper Beyer [although to no avail]

CLIFTON JACKSON AFFIDAVIT AND APPENDIX OF EXHIBITS ARE NUMBERED [first two cover pages of affidavit unnumbered, *iii-lxiii*] IN ROMAN NUMERAL. EXHIBIT PAGES ARE CROSS REFERENCED AS APPENDIX [Appendix Pages are numbered 1-655] PAGES. AFFIDAVIT AND EXHIBITS ARE IN SUPPORT OF 26B MOTION TO REOPEN STATE OF OHIO v. CLIFTON JACKSON, CASE NO. 11CR083104, NINTH DISTRICT COURT OF APPEALS CASE NO. 14CA010555, Not Limited Too.

attempted to initiate with endless attempts, to strike up conversations associated with drugs, again even though I had previously invoked my right to remain silence and right to counsel (which was confirmed by Ohio State Trooper Christopher Beyer, See Attached (Appendix of Exhibits), Exhibit "J", Page 17, lines 11-17).

47. On or about June 15th, 16th, and possibly June 17th, 2011 the "DTFO" appeared at Lorain County Jail and re initiated interrogations [again to no avail] in attempts to get me to cooperate without counsel being present, which I declined to cooperate every time to date. This can be affirmed via the internal records at the Lorain County Jail.
48. On or about June 17th or 18th of 2011, attorney Jack Bradley of Lorain, Ohio was retained to represent me with the verbal agreement that no motion(s) etc., would be filed in my case/name without my participation or approval, nor should any hearings, motion(s) etc., be waived. Jack Bradley agreed to the verbal contract terms! *See Attached (Appendix of Exhibits), "AAR" for the specific codes of violations, which is alleged to be strictly governed by the rules of the court*, Ohio Rules of Professional Conduct – Rule 1.1; Rule 1.2(a)(c)(d)&(e); Rule 1.3; Rule 1.4(a)(1)(2)(3)(4)(5)(B)&(C); Rule 2.1; and Supreme Court Rules for the Government of the Bar – Rule 1, Section 1 (d)(f); Section 3(B)(1)(2); **Rule 3**, Section 3(A)(C)(D); **Rule 4**, Section 1 & 2; and Gov. Jud. R. 1, Section 1 & 2.
49. On or about June 20th, 2011, I had to appear in the Municipal Court in the City of Vermilion. I thought it was out of the norm that every time I had to appear in a Court Room, "Trooper Beyer" was always the officer that transported me, and on every occasion, he would (although futile) make endless attempts to strike up conversations concerning drugs. My appearance was in relation to a Bond-Over Hearing and Bail Reduction Hearing. The bail remained the same, and counsel (J. Bradley) without communication, input, consent or warning waived the Bond-Over Hearing (which would have created a record) against my oral objections to the Court. **This can be affirmed via the internal records at the Lorain County Jail.**
50. On or about June 27th, 2011, I posted bail [**this can be affirmed via the internal records at the Lorain County Jail**], and via counsel, it was legally established that I would be residing in the Buffalo, New York area, pending the outcome of the case.

CLIFTON JACKSON AFFIDAVIT AND APPENDIX OF EXHIBITS ARE NUMBERED [first two cover pages of affidavit unnumbered, iii-ixiii] IN ROMAN NUMERAL. EXHIBIT PAGES ARE CROSS REFERENCED AS APPENDIX [Appendix Pages are numbered 1-655] PAGES. AFFIDAVIT AND EXHIBITS ARE IN SUPPORT OF 26B MOTION TO REOPEN STATE OF OHIO v. CLIFTON JACKSON, CASE NO. 11CR083104, NINTH DISTRICT COURT OF APPEALS CASE NO. 14CA010555, Not Limited Too.

51. On or about July of 2011 or shortly thereafter, I traveled from Buffalo, New York, to attorney Jack Bradley's Law Office in the City of Lorain, Ohio for the initial office visit. At which point I verbally reiterated my desired instructions not to waive any hearings, motions, speedy trial etc., in addition not to submit anything in my case/name without first communicating with me, for my input and/or consent. It was well established, although a title of a lawyer was attorney Bradley's profession, however this case evolves around my life, therefore attorney Bradley did not have the authority to make any final decision(s) without my knowledge, input and most importantly my consent. Once again attorney Bradley agreed to terms of the oral contract previously entered. I immediately requested a copy of the actual traffic stop "CAD Reports" and the "LEADS LOGS" which attorney Bradley's position was my requests were evidence that would surface during (via) a Brady/Discovery Request filing. I also gave attorney Bradley specific instructions not to waive or stop the speedy trial clock for any reason. See Attached (Appendix of Exhibits), "AAR" for the specific codes of violations, which is alleged to be strictly governed by the rules of the court. Prof. Cond. R. 1.1; 1.2(a)(c)(d)(e); 1.3; 1.4(a)(1)(2)(3)(4)(5), (B)&(C); 2.1; Gov. Bar. R. 1, Section 1(D)&(F), Section 3(B) (1) & (2); Gov. Bar. R. 3, Section 3(A)(c)&(d); Gov. Bar. R. 4, Section 1 & 2; Gov. Jud. R. 1, Sections 1 & 2.
52. On or about August of 2011 (See Attached Exhibit "C") , an indictment was issued by the Lorain County Grand Jury, and I was arraigned in Lorain County Court of Common Pleas, the Honorable Judge- Edward Zaleski residing, assigned Case No. 11CR083104. [Zaleski now retired]. The "DTFO" also submitted their formal (See Attached (Appendix of Exhibits), Exhibit "D") report refusing to supersede the charges prepared by Trooper Christopher Beyer [even though both Trooper Beyer and Trader were involved in the illegal search of my vehicle, Trooper Trader's written report nor his body mic and audio & video of his cruiser (Brady Material) has yet to be disclosed to me to date].
53. On or about August 25th, 2011, without my knowledge, input or consent, attorney Bradley filed a motion for discovery. However, once I became aware of this motion by way of an email I received from attorney Bradley's Law Offices [a copy of said motion], I immediately paid specific attention to point 3. See Attached (Appendix of Exhibits), Exhibit "E"; See also exhibit "AAR" for the specific codes of violations, which is alleged to be strictly governed by the rules of the court, Prof. Cond. R. 1.1; 1.2(a)(c)(d)&(e); 1.3; 1.4(a)(1)(2)(3)(4)(5), (B)&(C); 2.1; Gov. Bar. R. 1, Section 1(D)&(F); Gov. Bar. R. 3, Section 3(A)(c)&(d); Gov. Bar. R. 4, Sections 1 & 2; Gov. Jud. R. 1, Sections 1 & 2.
54. On or about September 8th, 2011, by way of email, I received a copy of the motion of discovery reply authored by Assistant Prosecuting Attorney Laura Ann Dezort (0059460). Which I paid specific attention to Point 1 (defendant's/ co-defendant *s statement), which stated: "Please refer to Ohio State Highway Patrol Report No. 11-10115-1090 and discovery material" and Point 3 list of documents of which copies are being provided

CLIFTON JACKSON AFFIDAVIT AND APPENDIX OF EXHIBITS ARE NUMBERED [first two cover pages of affidavit unnumbered, iii-ixii] IN ROMAN NUMERAL. EXHIBIT PAGES ARE CROSS REFERENCED AS APPENDIX [Appendix Pages are numbered 1-655] PAGES. AFFIDAVIT AND EXHIBITS ARE IN SUPPORT OF 26B MOTION TO REOPEN STATE OF OHIO v. CLIFTON JACKSON, CASE NO. 11CR083104, NINTH DISTRICT COURT OF APPEALS CASE NO. 14CA010555, Not Limited Too.

pursuant to Crim. R.. 16(B)(3)(4), which were 9 photos of the vehicle and drugs and cruisers video 1-DVD, with a specific detailed note which stated: **"the State intends to use all evidence referenced in the police report/discovery material. Attorney Bradley was advised to contact the Ohio State Highway Patrol, Milan Post to make an appointment to inspect any tangible evidence not otherwise provided."** Lastly **Point 4** (exculpatory evidence), which stated: **"None known to the State of Ohio at this time."** See Attached (Appendix of Exhibits), Exhibit "F"

55. On or about September of 2011, I drove from Buffalo, NY to Lorain, Ohio again for another office visit with attorney Jack Bradley, at which point myself and Bradley agreed upon the following (not limited to):

A. To avoid the heavy expense of the constant long distance travel, alleged missed phone calls etc., unless absolutely necessary - emailing would be our primary vehicle of communication of correspondence, which shall include scanning and sharing of documents, notifications, authorizations, amendments etc., which attorney Bradley agreed to [as myself and attorney Bradley's office had already birth the vehicle of email communications.

B. Attorney Bradley birth the preparation of a suppression hearing motion, at which point I respectfully shared with attorney Bradley the dislike of the motion in its entirety. I then immediately informed attorney Bradley that his professional input would be welcome, however the initial paperwork (the foundation) would be prepared and presented to him from me, which the contents I present are not to be altered, deleted and/ or disturbed prior to submission. I respectfully shared with attorney Bradley, with all due respect for his person and profession, he works for me and its my life on line not his which I delegate the work, not limited to the preparation of motions etc., nor do I share this authority not even with you attorney Bradley, I and only I have the final say in all submissions, decisions regarding my case, you are only the face of an attorney needed to submit my specific issues as I deem before the court, if you do not agree attorney Bradley, I have no problem with finding an attorney that will! Attorney Bradley agreed.

56. On or about September of 2011, without my knowledge, input or consent, attorney Bradley waived the speedy trial clock for no defined reason to me. To date, I had no reason to disturb the speedy trial clock, besides the rules regarding the speedy trial clock associated to the rules of the Suppression Hearing, ever during the life of the proceedings associated with Docket No. 11CR083104. Without my knowledge, input or consent, attorney Bradley requested a continuance unto November of 2011, of which I was only made aware by way of email notification in September of 2011. See Attached (Appendix of Exhibits), Exhibit "AAR" for the specific codes of violations, which is alleged to be strictly governed by

CLIFTON JACKSON AFFIDAVIT AND APPENDIX OF EXHIBITS ARE NUMBERED [first two cover pages of affidavit unnumbered, iii-ixiii] IN ROMAN NUMERAL. EXHIBIT PAGES ARE CROSS REFERENCED AS APPENDIX [Appendix Pages are numbered 1-655] PAGES. AFFIDAVIT AND EXHIBITS ARE IN SUPPORT OF 26B MOTION TO REOPEN STATE OF OHIO v. CLIFTON JACKSON, CASE NO. 11CR083104, NINTH DISTRICT COURT OF APPEALS CASE NO. 14CA010555, Not Limited Too.

the rules of the court. Prof. Cond. R. 1.1; 1.2(a)(c)(d)&(e); 1.3; 1.4(a)(1)(2)(3)(4)(5), (B) & (C); 2.1; Gov. Bar. R. 1, Section 1(d)&(f); Gov. Bar. R. 3, Section 3(a)(c)&(d); Gov. Bar. R. 4, Section 1 & 2; Gov. Jud. R. 1, Sections 1 & 2.

57. On or about October 31st, 2011, by way of certified mail/return receipt (United States Postal Service certified No. 7008 0150 0000 2715 0424), I mailed attorney Bradley "the final draft of the motion to suppress prepared by me filed November 4th, 2011. See Attached (Appendix of Exhibits), Exhibit "G & H".
58. Attorney Jack Bradley filed the Motion to Suppress on November 4th, 2011 he received from me by way of certified mail. "Although counsel professional input was desired and requested, attorney Bradley's office did not participate in the final draft of my motion. See Attached (Appendix of Exhibits), Exhibit "H".
59. On or about December 15th, 2011, I received an email from attorney Bradley, which expressed legality concerns regarding Ohio State Trooper K-9 Argo's ability to perform independent drug alert-ion, and the fact that Ohio State Trooper K-9 Argo only alerts to drugs on command. See Attached (Appendix of Exhibits), Exhibit "I".
60. On and off between January and June of 2012, I traveled back and forth from Buffalo, NY to Elyria, OH for various Court dates, pretrial hearings were unknown to me, were made at the defense request by attorney Bradley. Again as previously stated, I have never requested pretrial hearing continuance personally, nor did I instruct or consent to attorney Bradley doing so! [The procedure was, "I would receive Court notification by way of attorney Bradley's office via email, I would then make the three (3) plus hour travel from Buffalo to Elyria, only to appear before a completely empty Court Room."] If attorney Bradley was not sharing a laugh with whom I now know to have been the Lorain County Assistant Prosecuting Attorney (whom changed various times), attorney Bradley was running behind closed doors, alleged to be in the Judge's Chambers alleged to be addressing my case, which I openly verbally objected to attorney Bradley numerous times. Because I was not present to know what was being discussed concerning my case, and the fact that there is no record concerning what was discussed in the Judge's Chambers. However, factually unbeknown to me, which eventually attorney Bradley would return on average within ten (10) to fifteen (15) minutes with rescheduled pretrial conference hearings alleged to have been requested by attorney Bradley (the defense), with a form to sign referencing the same with speedy trial implications. Attorney Bradley mislead me into believing as long as the Suppression Hearing Motion was pending "the suppression motion automatically suspends the speedy trial clock until a decision is rendered, at which point once a decision is rendered, the speedy trial clock would automatically resume against the State of Ohio." The speedy trial clock is automatically suspended, however after the Suppression Hearing states, as the record would reflect, I stopped signing those sham forms attorney Bradley and eventually

CLIFTON JACKSON AFFIDAVIT AND APPENDIX OF EXHIBITS ARE NUMBERED [first two cover pages of affidavit unnumbered, iii-ixiii] IN ROMAN NUMERAL. EXHIBIT PAGES ARE CROSS REFERENCED AS APPENDIX [Appendix Pages are numbered 1-655] PAGES. AFFIDAVIT AND EXHIBITS ARE IN SUPPORT OF 26B MOTION TO REOPEN STATE OF OHIO v. CLIFTON JACKSON, CASE NO. 11CR083104, NINTH DISTRICT COURT OF APPEALS CASE NO. 14CA010555, Not Limited Too.

the Court would produce from behind closed door proceedings altogether the life of my case, which lasted approximately 2 years. *See Attached (Appendix of Exhibits), Exhibit "AAR" for the specific codes of violations, which is alleged to be strictly governed by the rules of the court.* Prof. Cond. R. 1.1; 1.2(a)(c)(d)&(e); 1.3; 1.4(a)(1)(2)(3)(4)(5), (B) & (C); 2.1; Gov. Bar. R. 1, Section 1 (d)&(f); Gov. Bar. R. 3, Section 3(a)(c)&(d); Gov. Bar. 4, Section 1 & 2; Gov. Jud. R. 1, Section 1 & 2.

61. On or about June 4th, 2012, the Suppression Hearing commenced . Attorney Bradley did not have any such prior discussion with me of any kind prior to the Suppression Hearing by way of email, phone calls, office visits, (the date of) pre-court appearances etc., regarding intentions, pretrial & trial strategies, waiving evidence (our strongest evidence), the viewing of the audio & video. I objected to attorney Bradley's waiving the viewing of the audio & video in open court for the record. I also objected to attorney Bradley for not objecting to the prosecution's use of selective portions of the audio & video, after attorney Bradley had already waived the viewing of the audio & video which was granted by the trial court. How could attorney Bradley impeach or rebut any of the State's witnesses testimony at the Suppression Hearing if the portions of the audio & video which contradicts such witness' testimony is not viewed by the Court, and most importantly placing on the record "those facts establishing a prima facie showing of the Fourth Amendment violation upon which the motion to suppress was claimed in the first place." Attorney Bradley refused to object on the record and stated "that the only reasons he was objecting was due to his being instructed to do so by me." The Suppression Hearing did not conclude that day. *See Attached (Appendix of Exhibits), Exhibit "J". See also exhibit "AAR" for the specific codes of violations, which is alleged to be strictly governed by the rules of the court.* Prof. Cond. R. 1.1; 1.2(a)(c)(d)&(e); 1.3; 1.4(a)(1)(2)(3)(4)(5), (B) & (C); 1.6(a); 2.1; 3.4(a)(b)(d)&(e); 4.1(a)(b); 5.1(c)(1)&(2); 8.3(a)(b); 8.4(a)(b)(c)(d)(e)(f)(g)&(h); Gov. Bar. R. 1, Section 1(d)&(f); Gov. Bar. R. 3, Section 3(a)(c)&(d); Gov. Bar. R. 4, Sections 1 & 2; Gov. Jud. R. 1, Sections 1 & 2.

62. On or about August 14th, 2012, the Suppression Hearing decision had still not been rendered, however, there was another generic court date scheduled, only to be rescheduled again, with the same (attorney Bradley) running behind close doors as stated above at 60, however I was notified by attorney Bradley "that Judge Edward Zaleski, 'requested the vehicle's rental agreement." Which based on the fact that "no rental agreement arguments were preserved or reserved for the initial record." I deemed such a request moot and prejudicial to both parties, where such an argument could not be argued on the record of my case without both parties being afforded a copy of the vehicle's rental agreement, at which point once again without any prior communication, notification, intention, strategies etc., attorney Bradley submitted a motion in my case completely without my knowledge, input or consent. *See Attached (Appendix of Exhibits), Exhibit "K". See also exhibit "AAR" for the specific codes of violations, which is alleged to be strictly governed*

CLIFTON JACKSON AFFIDAVIT AND APPENDIX OF EXHIBITS ARE NUMBERED [first two cover pages of affidavit unnumbered, iii-ixiii] IN ROMAN NUMERAL, EXHIBIT PAGES ARE CROSS REFERENCED AS APPENDIX [Appendix Pages are numbered 1-655] PAGES. AFFIDAVIT AND EXHIBITS ARE IN SUPPORT OF 26B MOTION TO REOPEN STATE OF OHIO v. CLIFTON JACKSON, CASE NO. 11CR083104, NINTH DISTRICT COURT OF APPEALS CASE NO. 14CA010555, Not Limited Too.

by the rules of the court. Prof. Cond. R. 1.1; 1.2(a)(c)(d)&(e); 1.3; 1.4(a)(1)(2)(3)(4)(5), (B) & (C); 1.6(a); 2.1; 4.1(a)(b); 5.1(c)(1)(2); 8.3; 8.4; Gov. Bar. R. 1, Section 1 (d)&(f); Gov. Bar. R. 3, Section 3(A)(C)&(D); Gov. Bar. R. 4, Sections 1 & 2; Gov. Jud. R. 1, Sections 1 & 2; See also, Canon 1, 1.1, 1.2; and 1.3; Canon 2, 2.1; 2.2; 2.4(a)(b)&(c); 2.5(a); 2.6(a)&(b); 2.7; 2.9(A); 2.10(A)(B)&(C); 2.11(a)(1)(5)&(7)(b); 2.12(A); and Canon 3, 3.1(A)(C)&(D).

63. On or about August 15th, 2012 (05:04:41 P.M.), I sent an email to attorney Bradley [confirmed received], subject matter stated: "Points that I want included in the summation per the ongoing Suppression Hearing pending." The contents of the email was primarily based with instructions to address Troopers Beyer's and Trader's credibility concerns, with immediate instruction to challenge the same, and to support it by the record. Although there were informal previous verbal request dating back to 2011, I directly informally instructed attorney Bradley to obtain official copies of the LEADS SYSTEM LOGS, and CAD REPORTS, not limited too. Although attorney Bradley's office confirmed receipt of my email, attorney Bradley's actions were completely unprofessional as far as maintaining a good lawyer and client relationship by ignoring said emails. See Attached (Appendix of Exhibits), Exhibit "L". See also exhibit "AAR" for the specific codes of violations, which is alleged to be strictly governed by the rules of the court. Prof. Cond. R. 1.1; 1.2(a)(c)(d)&(e); 1.3; 1.4(a)(1)(2)(3)(4)(5), (B) & (C); 2.1; 4.1(A)&(B); 5.1(C)(1)&(2); 8.3(A)&(B); 8.4(a)(b)(c)(d)(e)(f)(g)&(h); Gov. Bar. R. 1, Section (d)&(f); Gov. Bar. R. 3, Section 3(A)(C)&(D); Gov. Bar. R. 4, Sections 1 & 2; Gov. Jud. R. 1, Sections 1 & 2.
64. On or about September 11th, 2012, I sent an email to attorney Bradley [confirmed received], which mirrored the email sent/confirmed received of August 15th, 2012. In addition to the immediate request of copies of the LEADS LOGS, CAD REPORTS, not limited too. My concerns of attorney Bradley's actions in failing to communicate with me after being paid to represent me, in some way was depriving me of my Constitutional Right of counsel, in an attempt to let attorney Bradley know that I am aware of my constitutional rights. See Attached (Appendix of Exhibits), Exhibit "M". See also exhibit "AAR" for the specific codes of violations, which is alleged to be strictly governed by the rules of the court. Prof. Cond. R. 1.1; 1.2(a)(c)(d)&(e); 1.3; 1.4(a)(1)(2)(3)(4)(5), (B) & (C); 2.1; 4.1(A)&(B); 5.1(C)(1)&(2); 8.3(A)&(B); 8.4(a)(b)(c)(d)(e)(f)(g)&(h); Gov. Bar. R. 1, Section (d)&(f); Gov. Bar. R. 3, Section 3(A)(C)&(D); Gov. Bar. R. 4, Sections 1 & 2; Gov. Jud. R. 1, Sections 1 & 2.
65. On or about October 1st, 2012, I received an email from attorney Bradley's office with an attachment, which was [now retired] Judge Edward Zaleski's Suppression Hearing Decision that consisted of 3 of 3 pages, signature d by Judge Edward Zaleski, what was stated specifically above his signature was the following:

"For the foregoing reasons, Defendants Motion to Suppress is granted".

CLIFTON JACKSON AFFIDAVIT AND APPENDIX OF EXHIBITS ARE NUMBERED [first two cover pages of affidavit unnumbered, iii-ixiii] IN ROMAN NUMERAL. EXHIBIT PAGES ARE CROSS REFERENCED AS APPENDIX [Appendix Pages are numbered 1-655] PAGES. AFFIDAVIT AND EXHIBITS ARE IN SUPPORT OF 26B MOTION TO REOPEN STATE OF OHIO v. CLIFTON JACKSON, CASE NO. 11CR083104, NINTH DISTRICT COURT OF APPEALS CASE NO. 14CA010555, Not Limited Top.

The document filed September 28th, 2012 is the same identical document altered, with the part stating my motion to suppress was granted removed and a prima facie showing of the document being altered. **See Attached (Appendix In Support), Exhibits "N"** (the altered document filed) & **"O"** (the original document now retired Judge Edward Zaleski authored and signature d)".

66. **On or about October 3rd, 2012**, I sent an email to attorney Bradley's office [confirmed received], once again re-assertion of my dissatisfaction of his unprofessional conduct due to his failure to communicate with me concerning my case and specific instructions, and his ignoring of this email. **See Attached (Appendix of Exhibits) Exhibit "P"**. *See also exhibit "AAR" for the specific codes of violations, which is alleged to be strictly governed by the rules of the court.* **Prof. Cond. R. 1.1; 1.2(a)(c)(d)&(e); 1.3; 1.4(a)(1)(2)(3)(4)(5), (B) & (C); 2.1; 4.1 (A)&(B); 5.1(C)(1)&(2); 8.3(A)&(B); 8.4(a)(b)(c)(d)(e)(f)(g)&(h); Gov. Bar. R. 1, Section (d)&(f); Gov. Bar. R. 3, Section 3(A)(C)&(D); Gov. Bar. R. 4, Sections 1 & 2; Gov. Jud. R. 1, Sections 1 & 2.**
67. **On or about October 4th, 2012**, I sent an email to attorney Bradley's office [confirmed received], informing him that I was giving him one last chance to respond to my email(s) "this time I sent it **certified mail return receipt requested** (Certified #s 7007 0220 0001 3690 7239), expressing my same concerns. **See Attached (Appendix of Exhibits), Exhibit "Q"**. *See also exhibit "AAR" for the specific codes of violations, which is alleged to be strictly governed by the rules of the court.* **Prof. Cond. R. 1.1; 1.2(a) (c) (d)&(e); 1.3; 1.4(a) (1) (2) (3) (4) (5), (B) & (C); 2.1; 4.1(A)&(B); 5.1(C)(1)&(2); 8.3(A)&(B); 8.4(a)(b)(c)(d)(e)(f)(g)&(h); Gov. Bar. R. 1, Section (d)&(f); Gov. Bar. R. 3, Section 3(A)(C)&(D); Gov. Bar. R. 4, Sections 1 & 2; Gov. Jud. R. 1, Sections 1 & 2.**
68. **On or about October 24th, 2012**, finally, I received a blank DVD s from attorney Bradley by way of U.S. Mail (a package), I was very glad to finally receive something from Bradley, it was two to three DVD s alleged to contain copies of the actual audio & video of the traffic stop only. Otherwise, attorney Bradley nor his office did not use the United States Postal Services to share notifications, documentations, consent forms etc.. Our primary and sole vehicle of communications were by way of phone calls and emails, which was well established and agreed upon as mentioned mid 2011. **See Attached (Appendix of Exhibits t), Exhibit "R"**.
69. **On or about November 13th, 2012**, I sent an email to attorney Bradley's office [confirmed received], expressing my concerns regarding drafts and the intent of a "Reconsideration Motion" prepared by attorney Bradley, shared by way of email, as to why he would submit a filing of reconsideration of our favorable ruling on our Motion to Suppress. When such a filing was not authorized by me number one, and secondly, such a filing is not authorized

CLIFTON JACKSON AFFIDAVIT AND APPENDIX OF EXHIBITS ARE NUMBERED [first two cover pages of affidavit unnumbered, iii-ixiii] IN ROMAN NUMERAL. EXHIBIT PAGES ARE CROSS REFERENCED AS APPENDIX [Appendix Pages are numbered 1-655] PAGES. AFFIDAVIT AND EXHIBITS ARE IN SUPPORT OF 26B MOTION TO REOPEN STATE OF OHIO v. CLIFTON JACKSON, CASE NO. 11CR083104, NINTH DISTRICT COURT OF APPEALS CASE NO. 14CA010555, Not Limited Too.

by law with respect to reconsideration of a Suppression Hearing. And as an attorney license to practice law in the State of Ohio, attorney Bradley should have been aware of this fact. **See Attached (Appendix of Exhibits), Exhibit "S".** *See also exhibit "AAR" for the specific codes of violations, which is alleged to be strictly governed by the rules of the court.* **Prof. Cond. R. 1.1; 1.2(a)(c)(d)&(e); 1.3; 1.4(a)(1)(2)(3)(4)(5), (B) & (C); 2.1; 4.1(A)&(B); 5.1(C)(1)&(2); 8.3(A)&(B); 8.4(a)(b)(c)(d)(e)(f)(g)&(h); Gov. Bar. R. 1, Section (d)&(f); Gov. Bar. R. 3, Section 3(A)(C)&(D); Gov. Bar. R. 4, Sections 1 & 2; Gov. Jud. R. 1, Sections 1 & 2.**

70. **On or about November 16th, 2012** around 8:22A.M., I sent an email to attorney Bradley [confirmed received], with my specific immediate instruction not to submit the reconsideration motion, until my amendments etc., were implemented. **See Attached (Appendix of Exhibits), Exhibit "U".** Attorney Bradley ignored my specific instructions and filed the motion for reconsideration anyway. *See also exhibit "AAR" for the specific codes of violations, which is alleged to be strictly governed by the rules of the court.* **Prof. Cond. R. 1.1; 1.2(a)(c)(d)&(e); 1.3; 1.4(a)(1)(2)(3)(4)(5), (B) & (C); 2.1; 4.1(A)&(B); 5.1(C)(1)&(2); 8.3 (A)&(B); 8.4(a)(b)(c)(d)(e)(f)(g)&(h); Gov. Bar. R. 1, Section (d)&(f); Gov. Bar. R. 3, Section 3(A)(C)&(D); Gov. Bar. R. 4, Sections 1 & 2; Gov. Jud. R. 1, Sections 1 & 2.**

71. **On or about November 16th, 2012** around 12:39 P.M., I received an email from attorney Bradley's office [confirmed received], informing me that attorney Bradley was proceeding with the filing of the motion for reconsideration anyway against my specific instructions and wishes, which was actually filed November 16th, 2012 around 3:03 P.M.. **See Attached (Appendix of Exhibits), Exhibit "V".**

72. **On or about November 20th, 2012** around 5:41 P.M., I received an email from attorney Bradley, in his futile attempt to discourage me from making amendments to the motion for reconsideration filed against my specific instructions. **See Attached (Appendix of Exhibits), Exhibit "T".** *See also exhibit "AAR" for the specific codes of violations, which is alleged to be strictly governed by the rules of the court,* **Prof. Cond. R. 1.1; 1.2(a)(c)(d)&(e); 1.3; 1.4 (a)(1)(2)(3)(4)(5), (B) & (C); 2.1; 4.1(A)&(B); 5.1(C)(1)&(2); 8.3(A)&(B); 8.4(a)(b)(c)(d)(e)(f)(g)&(h); Gov. Bar. R. 1, Section (d)&(f); Gov. Bar. R. 3, Section 3(A)(C)&(D); Gov. Bar. R. 4, Sections 1 & 2; Gov. Jud. R. 1, Sections 1 & 2.**

73. **On or about November 21st, 2012** around 5:18A.M., I sent an email to attorney Bradley's office [confirmed received], solidifying my specific instructions regarding my amendments to be amended to the motion for reconsideration he previously filed, which all drafts (not limited to the final draft), were shared by way of email.

74. **On or about November 29th, 2012** around 5:32P.M., I sent an email to attorney Bradley's office [confirmed received], and forward to attorney Bradley November 30th, 2012 around 8:37 A.M., the supplement issues I wanted amended to the motion for reconsideration, which again the final draft were shared by way of email.

CLIFTON JACKSON AFFIDAVIT AND APPENDIX OF EXHIBITS ARE NUMBERED [first two cover pages of affidavit unnumbered, iii-ixiii] IN ROMAN NUMERAL. EXHIBIT PAGES ARE CROSS REFERENCED AS APPENDIX [Appendix Pages are numbered 1-655] PAGES. AFFIDAVIT AND EXHIBITS ARE IN SUPPORT OF 26B MOTION TO REOPEN STATE OF OHIO v. CLIFTON JACKSON, CASE NO. 11CR083104, NINTH DISTRICT COURT OF APPEALS CASE NO. 14CA010555, Not Limited Too.

75. On or about December 7th, 2012 around 12:08 P.M., per my specific immediate instructions, attorney Bradley filed the supplement to the motion for reconsideration, which he received from me by way of email of Nov. 30th, 2012. See Attached (Appendix of Exhibits), Exhibit "X".

76. On or about December 11th, 2012, I received an email from attorney Bradley's office [confirmed received], which contained an alleged copy of Judge Zaleski's "Decision of the motion for reconsideration & supplements, which consist of a one page, one sentence denial", which stated:

"Defendant's motion to Reconsider decision to Suppress is denied."

I immediately expressed legality concerns over the reconsideration under the suppression hearing rules, Judge Zaleski's one page, one sentence denial, which did not have the file stamp, and clearly the Judge's signature on this decision was different then the previous signature of the altered Suppression Hearing Decision filed Sept.28th, 2012. See Attached (Appendix of Exhibits), Exhibit "Y".

77. On or about December 19th, 2012, I sent an email to attorney Bradley's office [confirmed received], and requested a copy of any existing transcript (as always at my expense) of all the alleged meetings between attorney Bradley, Judge Zaleski (and/or), the prosecutor in the Judge's chambers, held behind closed doors. This email also expressed my dissatisfaction with attorney Bradley's professional and unprofessional conduct with respect maintaining a good lawyer and client relationship by ignoring my email(s). See Attached (Appendix of Exhibits), Exhibit "Z".

78. On or about December 19th, 2012, I sent a second email to attorney Bradley's office [confirmed received], in which there was another direct request to obtain copies of the LEADS LOGS to address some of the credibility concerns with respect to Troopers Christopher Beyer's and Michael Trader's testimony at the Suppression Hearing and at trial, being perjured testimony knowingly committed by both Troopers. In their futile attempts to cover up a Fourth Amendment violation occurring on June 14th, 2011, which renders all evidence illegally seized inadmissible under the "Fruits of the Poisonous Tree Doctrine". This email also was completely ignored. See Attached (Appendix of Exhibits), Exhibit "AA". See also exhibit "AAR" for the specific codes of violations, which is alleged to be strictly governed

CLIFTON JACKSON AFFIDAVIT AND APPENDIX OF EXHIBITS ARE NUMBERED [first two cover pages of affidavit unnumbered, III-IXIII] IN ROMAN NUMERAL, EXHIBIT PAGES ARE CROSS REFERENCED AS APPENDIX [Appendix Pages are numbered 1-655] PAGES. AFFIDAVIT AND EXHIBITS ARE IN SUPPORT OF 26B MOTION TO REOPEN STATE OF OHIO v. CLIFTON JACKSON, CASE NO. 11CR083104, NINTH DISTRICT COURT OF APPEALS CASE NO. 14CA010555, Not Limited Too.

by the rules of the court, Prof. Cond. R. 1.1; 1.2(a)(c) (d)&(e); 1.3; 1.4(a)(1)(2)(3)(4)(5), (B) & (C); 2.1; 4.1(A)&(B); 5.1(C)(1)&(2); 8.3(A)&(B); 8.4(a)(b)(c)(d)(e)(f)(g)&(h); Gov. Bar. R. 1, Section (d)&(f); Gov. Bar. R. 3, Section 3(A) (C)&(D); Gov. Bar. R. 4, Sections 1 & 2; Gov. Jud. R. 1, Sections 1 & 2.

79. **On or about December 27th, 2012**, I sent an email to attorney Bradley's office [confirmed received], in which I informed him that. I know my case happen in Ohio, and I am familiar with the laws in New York, so with that being said, I also informed attorney Bradley that I know my Constitutional Rights, and I was not one of his average clients, and I knew that my Fourth Amendment has been violated, and that his actions has deprived me of counsel as guaranteed under the Sixth Amendment. I even went so far as to obtain copies of the "**OHIO RULES OF THE COURT (STATE 2015)**". Then I gave attorney Bradley specific instructions not to alter the contents of my Motion to Suppress, but in his professional opinion, if there was anything that he could add to strengthen the issues of my motion to suppress it would be welcome [with respect to my Fourth Amendment violation claim under fruit of the poisonous tree doctrine]. **See Attached (Appendix of Exhibits), Exhibit "AB"**. See also exhibit "AAR" for the specific codes of violations, which is alleged to be strictly governed by the rules of the court, Prof. Cond. R. 1.1; 1.2(a)(c)(d)&(e); 1.3; 1.4(a)(1)(2)(3)(4)(5), (B) & (C); 2.1; 4.1(A)&(B); 5.1(C)(1)&(2); 8.3(A)&(B); 8.4(a)(b)(c)(d)(e)(f)(g)&(h); Gov. Bar. R. 1, Section (d)&(f); Gov. Bar. R. 3, Section 3(A)(C)&(D); Gov. Bar. R. 4, Sections 1 & 2; Gov. Jud. R. 1, Sections 1 & 2.
80. **On or about February 8th, 2013**, I was arrested and placed in Federal custody on unrelated charges.
81. **On or about February 15th, 2013**, I appeared in Federal Court on unrelated charges (**pay specific attention to page 14, Lines 8-11 of the Federal Transcripts**), however, Assistant U.S. attorney "**Maura O'Donnell, Esq.**", confirmed that the U.S. Attorney's Office in the Western District of New York had been in direct contact with the Court (Ohio) and/or Prosecuting Attorney's Office in Lorain County, Ohio. **See Attached (Appendix of Exhibits), Exhibit "AC"**.
82. **On or about March 5th, 2013**, I sent an email to attorney Bradley's office [confirmed received], in which I expressed my concerns about violation of my speedy trial rights and ineffective assistance of counsel in violation of the Sixth Amendment, and also those portions of the Ohio Rules of Professional Conduct in relations to attorney Bradley's failure to communicate with me to maintain a good client and attorney relationship. **See Attached (Appendix of Exhibits), Exhibit "AD"**. See also exhibit "AAR" for the specific codes of violations, which is alleged to be strictly governed by the rules of the court, Prof. Cond. R. 1.1; 1.2(a)(c)(d)&(e); 1.3; 1.4(a)(1)(2)(3)(4)(5), (B) & (C); 2.1; 4.1(A)&(B); 5.1(C)(1)&(2); 8.3(A)&(B); 8.4(a)(b)(c)(d)

CLIFTON JACKSON AFFIDAVIT AND APPENDIX OF EXHIBITS ARE NUMBERED [first two cover pages of affidavit unnumbered, iii-ixiii] IN ROMAN NUMERAL. EXHIBIT PAGES ARE CROSS REFERENCED AS APPENDIX [Appendix Pages are numbered 1-655] PAGES. AFFIDAVIT AND EXHIBITS ARE IN SUPPORT OF 26B MOTION TO REOPEN STATE OF OHIO v. CLIFTON JACKSON, CASE NO. 11CR083104, NINTH DISTRICT COURT OF APPEALS CASE NO. 14CA010555, Not Limited Too.

(e)(f)(g)&(h); Gov. Bar. R. 1, Section (d)&(f); Gov. Bar. R. 3, Section 3(A)(C)&(D); Gov. Bar. R. 4, Sections 1 & 2; Gov. Jud. R. 1, Sections 1 & 2.

83. On or about March 6th, 2013 at 10:36 A.M., I sent an email to attorney Bradley's office [confirmed received], in which I re-expressed my concerns about violations of my right to effective assistance of counsel, and once again stating my dissatisfaction with his handling of my case, and how his conduct violates the Ohio Rule of Professional Conduct and the Supreme Court Rules that Govern the Bar. See Attached (Appendix of Exhibits), Exhibit "AE". See also exhibit "AAR" for the specific codes of violations, which is alleged to be strictly governed by the rules of the court, Prof. Cond. R. 1.1; 1.2(a)(c)(d)&(e); 1.3; 1.4(a)(1)(2)(3)(4)(5), (B) & (C); 2.1; 4.1(A)&(B); 5.1(C)(1)&(2); 8.3(A)&(B); 8.4(a)(b)(c)(d)(e)(f)(g)&(h); Gov. Bar. R. 1, Section (d)&(f); Gov. Bar. R. 3, Section 3(A)(C)&(D); Gov. Bar. R. 4, Sections 1 & 2; Gov. Jud. R. 1, Sections 1 & 2.
84. On or about March 7th, 2013 at 11 :34 A.M., I re-sent the same email to attorney Bradley's office [confirmed received]. See Attached (Appendix In Support), Exhibit "AF".
85. On or about March 16th, 2013 at 8:49P.M., I sent an email to attorney Bradley's office [confirmed received], in which I addressed my concerns once again as to the issue of violation of my speedy trial rights and ineffective assistance of counsel, also asserting the Ohio Rules of Professional Conduct and the Supreme Court Rules that Govern the Bar, due to attorney Bradley's failure to properly investigate and argue issues and defenses that were in my best interest. See Attached (Appendix of Exhibits), Exhibit "AG". See also exhibit "AAR" for the specific codes of violations, which is alleged to be strictly governed by the rules of the court, Prof. Cond. R. 1.1; 1.2(a)(c)(d)&(e); 1.3; 1.4(a)(1)(2)(3)(4)(5), (B) & (C); 2.1; 4.1(A)&(B); 5.1(C)(1)&(2); 8.3(A)&(B); 8.4(a)(b)(c)(d)(e)(f)(g)&(h); Gov. Bar. R. 1, Section (d)&(f); Gov. Bar. R. 3, Section 3(A)(C)&(D); Gov. Bar. R. 4, Sections 1 & 2; Gov. Jud. R. 1, Sections 1 & 2.
86. On or about March 23rd, 2013 at 5:47 P.M., I sent an email I to attorney Bradley's office [confirmed received], in which once again I addressed my concerns as to the issue of ineffective assistance of counsel, also asserting the Ohio Rules of Professional Conduct and the Supreme Court Rules that Govern the Bar. See Attached (Appendix of Exhibits), Exhibit "AH". See also exhibit "AAR" for the specific codes of violations, which is alleged to be strictly governed by the rules of the court, Prof. Cond. R. 1.1; 1.2(a)(c)(d)&(e); 1.3; 1.4(a)(1)(2)(3)(4)(5), (B) & (C); 2.1; 4.1(A)&(B); 5.1(C)(1)&(2); 8.3(A)&(B); 8.4(a)(b)(c)(d)(e)(f)(g)&(h); Gov. Bar.

CLIFTON JACKSON AFFIDAVIT AND APPENDIX OF EXHIBITS ARE NUMBERED [first two cover pages of affidavit unnumbered, iii-ixiii] IN ROMAN NUMERAL. EXHIBIT PAGES ARE CROSS REFERENCED AS APPENDIX [Appendix Pages are numbered 1-655] PAGES. AFFIDAVIT AND EXHIBITS ARE IN SUPPORT OF 26B MOTION TO REOPEN STATE OF OHIO v. CLIFTON JACKSON, CASE NO. 11CR083104, NINTH DISTRICT COURT OF APPEALS CASE NO. 14CA010555, Not Limited Too.

R. 1, Section (d)&(f); Gov. Bar. R. 3, Section 3(A) (C)&(D); Gov. Bar. R. 4, Sections 1 & 2; Gov. Jud. R. 1, Sections 1 & 2.

87. On or about March 26th, 2013 at 1 :24 P.M., I sent an email to attorney Bradley's office [confirmed received], in which I addressed my concerns of his failure to properly investigate and address the Fourth Amendment violation of Troopers Christopher Beyer and Michael Trader and K-9 Argo illegal search of my vehicle, which violation was fully supported on the record by way of the "audio & Video" produced by the state. **See Attached (Appendix of Exhibits), Exhibit "AI".** See also exhibit "AAR" for the specific codes of violations, which is alleged to be strictly governed by the rules of the court, Prof. Cond. R. 1.1; 1.2(a)(c)(d)&(e); 1.3; 1.4(a)(1)(2)(3)(4)(5), (B) & (C); 2.1; 4.1 (A)&(B); 5.1(C)(1)&(2); 8.3(A)&(B); 8.4(a)(b)(c)(d)(e)(f)(g)&(h); Gov. Bar. R. 1, Section (d)&(f); Gov. Bar. R. 3, Section 3(A)(C)&(D); Gov. Bar. R. 4, Sections 1 & 2; Gov. Jud. R. 1, Sections 1 & 2.
88. On or about April 11th, 2013 at 5:16 P.M., I sent an email to attorney Bradley's office [confirmed received], in which I addressed my concerns of **Brady Material being withheld** (to date), **not limited too 'exculpatory evidence': LEADS LOG'S, and CAD REPORTS** of both troopers. And his being ineffective due to his failure in having the State to produce/comply with our discovery request, in violation once again of Ohio Rules of Professional Conduct and the Supreme Court Rules that Governs the Bar. **See Attached (Appendix of Exhibits), Exhibit "AJ".** See also exhibit "AAR" for the specific codes of violations, which is alleged to be strictly governed by the rules of the court, Prof. Cond. R. 1.1; 1.2(a) (c) (d)&(e); 1.3; 1.4(a)(1)(2)(3)(4)(5), (B) & (C); 2.1; 4.1(A)&(B); 5.1(C)(1)&(2); 8.3(A)&(B); 8.4(a)(b)(c)(d)(e)(f)(g)&(h); Gov. Bar. R. 1, Section (d)&(f); Gov. Bar. R. 3, Section 3(A) (C)&(D); Gov. Bar . R. 4, Sections 1 & 2; Gov. Jud. R. 1, Sections 1 & 2.
89. On or about May 22nd, 2013 at 5:53 A.M., I sent an email to attorney Bradley's office [confirmed received], in which I addressed once again my dissatisfaction of his handling of my speedy trial violation, and his failure for what ever reason to make a **Brady** request per my specific instructions to obtain the **LEADS LOGS** and **CAD REPORTS** of both Trooper Beyer and Trader, etc.. **See Attached (Appendix of Exhibits t), Exhibit "AK".** See also exhibit "AAR" for the specific codes of violations, which is alleged to be strictly governed by the rules of the court, Prof. Cond. R. 1.1; 1.2(a) (c) (d)&(e); 1.3; 1.4(a)(1)(2)(3)(4)(5), (B) & (C); 2.1; 4.1(A)&(B); 5.1(C) (1)&(2); 8.3(A)&(B); 8.4(a)(b)(c)(d)(e)(f)(g)&(h); Gov. Bar. R. 1, Section (d)&(f); Gov. Bar. R. 3, Section 3(A)(C)&(D); Gov. Bar. R. 4, Sections 1 & 2; Gov. Jud. R. 1, Sections 1 & 2.

CLIFTON JACKSON AFFIDAVIT AND APPENDIX OF EXHIBITS ARE NUMBERED [first two cover pages of affidavit unnumbered, iii-ixiii] IN ROMAN NUMERAL. EXHIBIT PAGES ARE CROSS REFERENCED AS APPENDIX [Appendix Pages are numbered 1-655] PAGES. AFFIDAVIT AND EXHIBITS ARE IN SUPPORT OF 26B MOTION TO REOPEN STATE OF OHIO v. CLIFTON JACKSON, CASE NO. 11CR083104, NINTH DISTRICT COURT OF APPEALS CASE NO. 14CA010555, Not Limited Too.

90. On or about June 17th, 2013 at 11:16 A.M., I sent an email to attorney Bradley's office [confirmed received], in which I immediately re-addressed my specific instructions not to submit any documentation/motion in my name **without my knowledge, input or consent**. See Attached (Appendix of Exhibits), Exhibit "AL".
91. On or about June 20th, 2013 at 7:41P.M., I sent an email to attorney Bradley's office [confirmed received], in which I addressed once again my concerns of his ineffectiveness as counsel, and the fact that he was not acting as counsel guaranteed by the Sixth Amendment, and his conduct with respect to my case violates the Ohio Rules of Professional Conduct and the Supreme Court Rules that Governs the Bar, which deprived me of the protection of the Sixth Amendment. **See Attached (Appendix of Exhibits), Exhibit "AM". See also exhibit "AAR" for the specific codes of violations, which is alleged to be strictly governed by the rules of the court, Prof. Cond. R. 1.1; 1.2(a) (c) (d)&(e); 1.3; 1.4(a)(1)(2)(3)(4)(5), (B) & (C); 2.1; 4.1(A)&(B); 5.1(C)(1)&(2); 8.3(A)&(B); 8.4(a)(b)(c)(d)(e)(f)(g)&(h); Gov. Bar. R. 1, Section (d)&(f); Gov. Bar. R. 3, Section 3(A) (C)&(D); Gov. Bar. R. 4, Sections 1 & 2; Gov. Jud. R. 1, Sections 1 & 2.**
92. On or about June 21st, 2013 at 7:46:45 P.M., I sent an email to attorney Bradley's office [confirmed received], in which I **addressed once again the violations of my Sixth Amendment protections**, and attorney Bradley's violations of the Ohio Rules of Professional Conduct and the Supreme Court Rules that Governs the Bar and his being ineffective as counsel. Also attached to this email, was the **Brady** request that I personally prepared (which was subsequently filed July 3rd, 2013), with immediate specific instructions to file it. **See Attached (Appendix of Exhibits), Exhibit "AM". See also exhibit "AAR" for the specific codes of violations, which is alleged to be strictly governed by the rules of the court, Prof. Cond. R. 1.1; 1.2(a)(c)(d)&(e); 1.3; 1.4(a)(1)(2)(3) (4)(5), (B) & (C); 2.1; 4.1(A)&(B); 5.1(C)(1)&(2); 8.3(A)&(B); 8.4(a)(b)(c)(d) (e)(f)(g)&(h); Gov. Bar. R. 1, Section (d)&(f); Gov. Bar. R. 3, Section 3(A)(C)&(D); Gov. Bar. R. 4, Sections 1 & 2; Gov. Jud. R. 1, Sections 1 & 2.**
93. On or about July 3rd, 2013, attorney Bradley fully complied with my specific instructions as a result my **Brady** requests were as follows. **See Attached (Appendix of Exhibits), Exhibit "AN".**
94. On or about July 3rd, 2013 at 12:45 P.M., I received an email from attorney Bradley's office, which read: "Clifton, please be advised that you will incur additional fees of at least \$5,000.00, and it would be greatly appreciated if you would start making regular payments." **See Attached (Appendix of Exhibits), Exhibit "AO".**
95. On or about October 7th, 2013, I sent an email to attorney Bradley's office [confirmed received], in which I requested that he compel the Lorain County Prosecutor's Office, to disclose any and