

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.

EXHIBIT

AAE

EXHIBITS A-AAAE IN SUPPORT OF CLIFTON JACKSON ENCLOSED AFFIDAVIT AND APPENDIX PREPARED MARCH OF 2016 OF A DETAILED TIME LINE OF FACTUAL EVENTS BETWEEN JUNE 14th, 2011 AND OCTOBER OF 2015 TO THE BEST OF MY LAYMEN LEGAL ABILITIES.

THIS EXHIBIT "AAE" IS REFERENCED IN ¶ 123 not limited too.

Dated February 5th, 2014

To: Lorain County
Elyria Patrol Post
38000 Cletus Drive
North Ridge, Oh 44039

From: Cipton A. Jackson
117 WEAVER ST.
Buffalo, NY 14206

RE: A Formal Internal Complaint to be Filed
Against Ohio State Trooper Christopher
H. BEYERS Relevant Incident No. 11-010
115-1090, Incident Date 06/14/2011, 08:44,
Photo Patch No. 90-7299.

To whom it may concern:

Attached, please locate copies of the
following:

- 1) Copy of Arrest Report
- 2) Copy of the Suppression Hearing Transcripts.

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As documented by Trooper BEYERS, I was arrested by him 06/14/2011. The relevant documentation(s) was prepared by Trooper BEYERS.

Per the documented, I knew the Trooper purposely and willfully falsified the documents.

Verbally, I shared the same with my counsel at the time Jack Bradley. Personally I have been requesting a operable copy of the actual traffic stop relevant, and additional documented confirmation via the L.E.A.D.S logs. Personally to date, both request as documented eludes me in violation(s) of my constitutional and due process protections. As documented, I have been requesting the same since August 15th, 2012, ultimately still to no avail to date, verbally I have been requesting the same since 06/14/2011.

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Nov 18th, 2013 Mr. Bradley was RE-
MOVED AS COUNSEL.

Nov 25th, 2013 Mr. Mark Aufdenkampe
was appointed counsel.

Although the confirmations via the
L.E.A.D.S. Logs as requested to date still
eludes me, however it was not until mid
January 2014 that I received confirmations
via my recently appointed counsel, after
his review of the actual stop in its en-
tirety, that L.E.A.D.S. was fully oper-
ational through the life of the traffic
stop, as this writer has always known
being illegally detained during that process
06/14/2011.

Therefore, due to the facts that serious
misconduct violates policies, procedures, rules,
or regulations that have an adverse impact
on the operation or integrity of the agency.

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which should result in a formal disciplinary action, because as documented this is clearly a violation(s) of the law!

The misconduct referred to is as follows:

1) Knowingly and willfully falsifying documents (SEE ARREST REPORT).

2) Committing Perjury under oath relevant the ABOVE (SEE SUPPRESSION HEARING TRANSCRIPTS).

3) Aiding another officer to violate a rule.

4) Abuse of Authority

5) Abuse of Process conduct unbecoming a law enforcement officer.

6) Lack of Courtesy

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7) Lack of Professionalism

8) Neglect of Duty

9) ADD ANY AND ALL OTHER APPLICABLE COMPLAINT THAT FIT!

ALSO FOR THE RECORD, TROOPER BEYERS ACTIONS OR THE LACK THEREOF, HAS CAUSED CONTINUED STRESS, MENTALLY, PHYSICALLY AND FINANCIALLY, CAUSING UNDUE HARDSHIP ON THE DEFENDANT AND HIS FAMILY, FOR THE FOLLOWING REASONS, NOT LIMITED TOO,

TROOPER BEYERS KNOWINGLY AND WILLFULLY FALSIFIED DOCUMENTS (SEE ARREST REPORT) AND TESTIFIED TO THE SAME PERJURY HE FALSIFIED / DOCUMENTED (SEE THE ATTACHED SUPPRESSION HEARING TESTIMONY), BY SPECIFICALLY TESTIFYING TO THE FOLLOWING UNDER OATH:

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ON DIRECT EXAMINATION

Page 13 line 24 - page 14 line 18.

Q. At what point did you call dispatch with the defendants information, and were they able to determine anything?

A. At the time, I'm not exactly sure of the exact time I was able to get a hold of dispatch with this info. ARE LEADS WAS DOWN AT THE TIME. THEY WERE DOING MAINTENANCE ON IT OR THERE WAS SOME ISSUE WITH IT. SO AT THE TIME, I WASN'T ABLE TO GIVE THEM, OR ABLE TO HAVE THEM CHECK THAT INFORMATION. I BELIEVE AT THE TIME THERE, WHY I WAS WAITING FOR TROOPER TRADER, I TRIED RUNNING CHECKS THROUGH LEADS THERE, AND THEY WERE ALL -- THEY CAME BACK THAT LEADS WAS DOWN AT THE TIME. SO AFTER THE, AFTER THERE WAS PROBABLE CAUSE TO SEARCH THE VEHICLE, LEADS

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had then came up, and then I radioed district, which would be believed dispatch center.

Q. Okay

A. This was around, I would say, 8:59 or 9:00 when LEADS had went back in service. I believe dispatch radio every one to say, hey, LEADS is back in service. If you need anything, you could check on your computer.

Page 18, line 25 - page 19 line 6

Q. And whose cruiser recorded this?

A. MINE

Q. And at the very beginning of the video, the portion I just showed you, is that - what vehicle is that, what are we -

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watching at the beginning of that video?

A. This is all from firsthand from my vehicle, my patrol car.

The perjury committed by Trooper Beyers clearly RESIDES, simply by viewing and listening to the audio and video of the actual stop dated June 14th, 2011 relevant, where as there is no questions of where the recordings derive from per Trooper Beyers own testimony, where as clearly the audio and video does not support any portion of Trooper Beyers (attached testimony), testimony and or the initial documentation(s) relevant prepared by him regarding LEADS in any way!

In fact Trooper Beyers documented paperwork and or suppression hearing testimony relevant the LEADS program, not limited too, highlights a individual who lives

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by his own laws, as those he targets!

TROOPER BEYERS ACTIONS ON THE LACK THEREOF, ARE NOT ONLY ILLEGAL, BUT PUNISHABLE AS WELL!

MORE IMPORTANTLY, THE PERJURY AND MANIPULATION OF THE OPERATIONAL STATUS OF THE L.E.A.D.S PROGRAM IS ULTIMATELY THE VEHICLE USED BY TROOPER BEYERS TO VIOLATE CLIFTON A. JACKSON CONSTITUTIONAL AND DUE PROCESS PROTECTIONS RELEVANT THE STATE OF OHIO v CLIFTON JACKSON, CASE NO. 11-CR-083104, not limited too!

To the powers that be, thank you in advance for your time and understanding, and in anticipation of your response,

Dated 02/05/2014, con't

Respectfully Submitted,
Clifton A. Jackson
Clifton A. Jackson

Original mailed to: Lorain County
Elyria Patrol Post
38600 Cletus Drive
North Ridge, Ohio 44039

cc// to the following:

Dennis P. Will
Lorain County Prosecuting Attorney
225 Court St., 3rd Floor
Elyria, Ohio 44035

Mark A. Aufdenkampe, LLC
33389 Walker Road, Suite A
Avon Lake, Ohio 44012

Attention Professional Standards Division
P.O. Box 182074
1970 West Broad St
Columbus, Ohio 43223

CLIFTON A. JACKSON SUCORN TO ME
ON THIS 5th DAY OF FEBRUARY, 2014

Kimberly T. Mrzyglod

KIMBERLY T MRZYGLOD
01MR0278128

Notary Public, State of New York
Qualified in ERIE County

My commission expires MAY 01, 2017

7013 1710 0001 1868 4437

mailed Certified Return Receipt.

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