

CLIFTON JACKSON AFFIDAVIT AND APPENDIX OF EXHIBITS ARE NUMBERED (first two cover pages of affidavit unnumbered, iii-lxlii) 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

AAK

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 "AAK" IS REFERENCED IN ¶ 124 not limited too.

April 9, 2014

To: Paul Griffin, Esq.

600 Broadway

Lorain, Ohio 44052

From: Clifton Jackson A652163

LORCI

2075 S. Avon Belden Rd.

Grafton, Ohio 44044

RE: Appeals Representation

Case No. 14CA010555

Dear Mr. Griffin

Sincerely the appropriate greetings!

As I presently sit doormat without my law work in limbo, this correspondence is not intended to be disrespectful by any means, however it will be informative and straightforward as I will speak freely of my immediate concerns in position.

All too well you know my current placement and position. Upon your appointment it was said that you are the best, however one of my concerns with you is your lax position of correspondence with me so far. You also know the law library structure in the transition process of the state of Ohio facilities from Lorain County Jail and Lorain Correctional Institution is just about nonexistent, and the legal structure is that the defendant is to be solely relying upon the attorneys regardless paid or appointed. If you consider any part of that thought process, respectfully ~~Boyd~~ ^{Boyd} any and all of that thought process because I am directly and completely included in every phase and every decision made regarding my legal process! This includes but not limited to final decisions, submissions, contents etc., communication is key! Also immediately, I am to be forwarded copies of any incoming or outgoing materials relevant to your legal representation of me not limited to the pending trial transcripts.

I must stress my concerns of the mentioned, although I do acknowledge the demands of this profession as you may be spread thin, however this understanding will remain on thin ice because although this is your profession, this is my life and to be frank, I have been railroaded at every phase of this judicial proceedings and this APPEALS PROCESS is one of my only and final opportunities to highlight the derailment.

It is my opinion that we are starting off on the wrong foot because you have not taken the time to visit me when I am only minutes away, could you take a second to simply inform me via an introduction correspondence that you filed my notice of appeal which was filed March 7th 2014. It is my opinion that information is just as important as the submitted brief and or the decision of the same, in which the later two cannot reside without the first. I am also aware of you immediately failing to notify me of the earliest availability date of mid April 2014 of the trial transcripts being ready. I should not have to search for anything; in fact respectfully you should be forwarding me any and all information immediately.

Simply put, if you are not finding time for simple notification, this immediately brings about red flags and questions of the quality, willingness and appropriate length of time and attention that my APPEAL BRIEF will demand!

Days before the trial started on or around February 7th 2014, a motion was prepared and submitted on my behalf, along with a detailed documented timeline of events from June 14 2011, 2 on around that submission day, minus the trial transcripts and thereafter personally prepared notes argument for the second day of trial to address the Fourth Amendment concerns, newly discovered evidence highlighting perjury, prompting the specific Trooper Trader/K-9 Argo team which is documented should not legally be in service per the dual documented service records, not limited to be identical arguments presented in the attached documents unrelated case, that of wind arguments, identical place search location, just about identical prompt location where the canine was ordered to scratch, same posture location etc, ~~etc~~, when the dog did not hit on the vehicle independently as required under constitutional protections- compared to Trooper Trader documented trial and suppression hearing testimony regarding the same.

Also for your personal knowledge, I had the documented timeline of events uploaded to PDF files which can be mainstreamed upon your request via email! The time I will be uploaded as needed however the timeline of events will be current, including the end close correspondence. The PDF files consist of every transcript etc!

Also another concern I have, I noticed your office is located just about right next door to the attorney Jack Bradley's my office, your office being located at 600 Broadway and Jack Bradley's office being located at 520 Broadway both of Lorain Ohio. ~~There is a documented distance for Mr. Bradley's small firm based on a documented case of ineffective assistance of counsel to a great degree!~~ To be honest based on the overall documented set of circumstances, your appointment of counsel simply from being from Lorain County and Lorain County small close-knit legal community, the possibilities of

social relations concerns me deeply!

Based on the extent and magnitude of the civil, due process and constitutional violations documented and highlighted for the record, I clearly would like to explore my options on an APPEAL BOND IMMEDIATELY!

Again as I previously stated, although I do not have my law materials presently with me (which consists of EVERYTHING about this case that I have personally fought, not Jack Bradley etc.), however via my accurate memory which will be supported by the record, I will present the following reasons why I believed as such but not limited to.

THE DOCUMENTED TIMELINE OF EVENTS SHOULD BE AND ARE TO BE THOROUGHLY REVIEWED!

They are clearly speedy trial issues, constitutional violations relevant the suppression(s) motions submitted- the documented hearing and the decisions of the same, which the original hearing was granted as documented, clear search and seizure/ Fourth Amendment violations, evidentiary rules violations, trial violations, denial of discovery, just to name a few, however not limited to. Again off of my accurate memory, here is a hollow shell of the following in a time line order:

THE AUDIO AND VIDEO OF THE ACTUAL STOP MUST BE WATCHED IN ITS ENTIRETY!

The audio and video of June 14 2011 of the actual stop is key, and was entirely relied upon by the prosecutor for my present illegal conviction(s). Although the prosecutor relied solely upon a phone conversation while I was illegally detained in Trooper Beyer's Patrol Cruiser while both Trooper Beyer's and Trader were illegally breaking into a documented locked vehicle and legally searching and listening to the mentioned phone conversation(s).

However relevant the illegal detention, it was not said that speaks louder than anything, because it highlights perjury, falsify legal documents (that of the arrest reports), prompting etc., sum totaling the violations of civil, due process and constitutional protections to the grave degree!

THE ARREST REPORT(S)

Trooper Beyer's documented and testified (although not consistent) to a specific time line of the actual alleged events of June 14, 2011 (see the documented arrest reports- the bible of a case number)

Trooper Beyer's documented in specifics within his alleged time line of the operational status of the L.E.A.D.S program (which is the radio program in patrol cruisers used for law enforcement to the abilities to check for valid licenses, warrants etc.), being out of service, and a specific time and statement given by dispatch of reasoning's and stating

now back in service as documented (and testified to by Beyer's at the suppression hearing- which was not consistent at all with his own documentations- and also testified again by Trooper Beyer's at trial- which that testimony was not consistent with the suppression hearing testimony nor his documented reports- nor was it consistent with the audio and video- which shows clearly the initial documentation, the suppression hearing and trial testimonies collectively were flat out perjury), however per the audio and video, none of the documented and testified to happen period!

Also please no on the documented arrest reports(s), there are reservations or pre reservations of a rental vehicle or its contents of a rental agreement etc. period (however this moot argument was solely at some point and at others heavily relied upon)!

Also, please pay close attention to the alleged documented conversation of where I was coming from and going (compared to the documented testimonies relevant at the suppression hearing in trial, nothing is remotely consistent)!

Also, please pay close attention to the documented alleged phone conversations (compared to the actual audio and video, again nothings consistent)!

PER THE AUDIO AND VIDEO

1. The Trooper is tailing (from the center lane) the vehicle driven by the defendant from 300 to 400 yards away as documented in the middle lane, the Trooper allegedly zooms his camera in from that distance to substantiate and tailing too closely allegation, however per the video(there was a line of vehicles passed tailing more closely to reach the defendants vehicle) the defendant uses proper signal and driving precautions to legally switch lanes to pass the motor home, however the defendant switch lanes, so did Trooper Beyer's for whatever reason.
2. Trooper buyers immediately jumped right behind the defendant with the no other vehicles insight, and after approximately 2 miles passed the motor home passed, Trooper Beyer's pulled the defendant over for allegedly tailing a motor home too closely almost 2 miles back (see suppression hearing transcripts: Beyer's states something along the lines he had to wait for a safe location where no guard rails/ safe location to pull the vehicle over, but per the video we were the only vehicles on the road, nor did it ever appear to be guard rails).
3. Trooper Beyer's last transmission was he's pulling the defendants vehicle over and running him through leads.
4. The defendant upon direction pulled over promptly and appropriately.
5. Trooper Beyer's per his onboard camera approached the defendant's vehicle, although the audio was inaudible, Trooper Beyer's received the defendant's driver's license and vehicle rental agreement.

6. Trooper Beyer's immediately without hesitation goes back to his patrol cruiser and again without hesitation immediately radios for Trooper Trader and K-9 assistance although no probable cause existed (see suppression hearing transcripts, Beyer's testifies to not smelling or seeing anything of a crime being committed or in the act of, he also testified at length in specifics of investigating the alleged fine prints of the rental agreement which is clearly a lie per the video which shows he did not spend two seconds investigating fine prints, license checks or anything else for that matter, but this was his documented perjured testimony to illegally expand the scope and length of the traffic stop).

7. Trooper Beyer's immediately jumped out of his patrol cruiser after radio waiting for K-9 Argo and Trooper Traders assistance returning to the defendant, after more inaudible conversation, illegally removes the defendant from the vehicle and stripped the defendant of his liberty by illegally detained in the defendant in the patrol cruiser well immediately starting the process of illegally listening to the defendants cell phone conversation (supported by the DEA testimony at trial. Also see the suppression motion submitted November 2011 with the attached affidavit. Also see the suppression hearing transcript where trooper testifies that the defendant locked the vehicle doors upon exiting the vehicle. Now we are dealing with a locked vehicle that required a warrant to legally gain entry. See the partial response to discovery requests October 2013, which the prosecutor admitted there were never any weren't requests or any warrants issued to legally gain entry to that lock vehicle.)

8. Shortly after being illegally detained, trooper trader arrives with the high strung K-9 Argo.

9. The walk around search ensued of the defendant's vehicle, starting at the trunk of the vehicle moving counterclockwise, when the K-9 reached the front of the vehicle, the high strung behaviors appears although Trooper Trader continued to slightly pull the K-9 counterclockwise. Once the search was approaching the rear again Trooper Trader slightly pulls on K-9 Argo again, Trooper Traders posture clearly changes at the same time taps on the vehicle were the K-9 Argo immediately starts to scratch.

10. From this constitutional act of violating protections by illegally prompting a police K-9 to illegally gain an alleged probable cause where as the poisonous path had already birthed, but the mentioned actions was an additional illegal means of search plus this was the vehicle used for Trooper Beyer's to say the K-9 hit on the vehicle.

11. From the illegal listening and prompting drugs were subsequently located in the trunk of the vehicle from an illegal search.

12. Trooper Beyer's re-approaches the patrol cruiser and places the defendant under arrest (conversation audible) but knowingly and purposely leaves the defendants cell phone in the vehicle, returned to the defendants vehicle and continue to illegally searched while they illegally listen to the defendant cell phone conversation(s) from outside (see trial transcripts Trooper Beyer's tried stressing he heard the cell phone

conversations after later review of the actual audio and video on board camera- however the DEA agent testified at trial that Trooper Beyer's immediately knew of the cell phone conversation (via admissions to the DEA agent relevant) from illegally listening during the actual stop!

13. As time passes the defendant continues to vent (conversation audible) stating along the lines of being profiled and there were no legal reasons for pulling him over, eventually Trooper Trader approaches the detaining patrol cruiser in hopes that the defend it would be willing to cooperate, in which the defendant clearly declines to cooperate!

THROUGHOUT THE LIFE OF THIS VIDEO

14. WHAT WAS NOT AUDIBLE in this documented Patrol cruiser onboard camera video, was clearly what was going on outside during the initial approach of the defendants vehicle and during the illegal search and seizure in a whole outside.

15. WHAT WAS INAUDIBLE throughout the life of this video was the initial conversation(s) before the defendant was illegally removed from his vehicle and illegally detained.

16. WHAT WAS AUDIBLE throughout the life of this video, was the phone conversation(s), in car radio transmissions, Trooper Beyer's and Trader when they approached the defendant for the various reasons while the defendant was illegally detained in the patrol cruiser, basically any form of transmissions within or immediately around the patrol cruiser!

17. February 2014 there was an internal complaint filed against Trooper Beyer's for falsifying documents being the arrest reports, and for perjury for testifying to the same falsified mention documents, which the internal complaint was supported by the arrest report and the suppression hearing transcripts, in reference to the audio and video of the traffic stop, in addition now that the complaint can and should be amended for the additional perjury committed relevant to the same via the trial process compared to the documented audio and video of the same for the following reasons:

18. Again as documented by Trooper Beyer's via a specific time line that the Leads program was down and came back into service once he immediately located the drugs via an alleged detailed specific statement via Leads also on a specific time line as to when Leads came back into service via radio transmission to all units per his suppression hearing and trial testimony which combined, separated or looked at individually, neither are consistent by any means, in addition per the audio of the actual stop simply never happened, nor was Leads ever out of service! There were no specific statements or mentioning of or via Leads period that will coincide with any version of Trooper Beyer's documentation or testimonies relevant.

19. Also see the arrest report, Trooper Beyer's per a specific documented timeline stated when he ran the defendant's driver's license through Leads, however it is this writer's belief per the audio and video of the actual stop, Trooper Beyer's never ran the defendant's license through Leads per the life of the stop, for the documented timeline and or per the life of the audio and video!

20. Also, Trooper Beyer's documented arrest reports also alleged a conversation of my coming and going, in fact via the suppression hearing and trial testimonies that was an issue because Beyer's was not acute with my alleged destination, however his trial and suppression hearing testimonies in addition to the arrest report(s) are completely inconsistent!

21. Trooper Beyer's documented arrest report(s) also alleges a cell phone conversation that does not exist and is consistent to the audio of the documented video.

22. The indictment and initial discovery request was vague and subpar at best.

23. November 2011 the initial suppression motion was submitted, the issue raised speaks volumes.

24. Early to mid June 2012 the suppression hearing commenced without the defendant's knowledge and or presence but no court transcripts of this hearing exist per the court reporter (see request of the court reporter November 2013 for all transcripts and her immediate response).

25. Late June 2012 (see suppression hearing transcripts) the suppression hearing commenced, per verbal motion to sever, which was granted- separating the Troopers from hearing one another's testimonies. Besides the already mentioned but not limited to, Trooper Beyer's relied heavily on the alleged rental agreement argument (which summed up is moot in substance) investigation to alleging expand the length and scope of the stop (which the audio and video shows he perjured himself because he did not spend one second investigating a alleged rental agreement, driver's license or any other paperwork for that matter). Also again, Trooper Beyer's testified to the specifics regarding the Leads program, the defendant locking the vehicle, being on a special profiling team, investigating the alleged fine prints of rental agreements, reasons why it took him almost 2 miles to pull me over etc., but not limited to!

26. Trooper Trader testifies, separating himself from Trooper Beyer's besides being called for K-9 assistance, in testifying K-9 Argo independently hitting on the vehicle detecting drugs (although Trooper Trader suppression hearing and trial testimonies are very inconsistent)!

27. This hearing is when the Troopers tried birthing a wind argument to which the judge (now retired) was having no parts of it (keep the attempted birth of this argument in mind, because it will later come full circle).

28. Now note at this point, although there were uncountable verbal request for copies of the Leads Logs/ CAD Repots and an operable a copy of the audio and video (Jack Bradley sent me a CD that was supposed to contain the audio and video of the actual stop, but upon review, the CD was completely blank! That was in the later part of 2012, however I did not personally see the actual the audio and video for the first time until February 11th 2014 at trial. The Leads Logs/ CAD reports as personally requested in for a motion format July 3, 2013, I have been illegally flat out denied to date) from my (then) attorney Jack Bradley up until that point to no avail, however this suppression hearing date late June 2012 I personally requested Jack Bradley to play the audio and video of the actual stop during the hearing, stressing him that this was part of the reasons of what the suppression hearing is for, ultimately Jack Bradley stated something along the lines of the judge denying the viewing of the audio and video in addition allegedly there were operable copies available and the judge would view the life of the audio and video and the Judges' chambers after the hearing, which struck me as odd and very disrespectful to my level of intelligence because the prosecutor and Trooper Beyer's were actually referring to their desired portions of the active audio and video during the hearing via a laptop at the prosecutor's table, and at that particular point in time is when Trooper Beyer's tried birthing a wind argument to which Judge Zelaski, now retired was having no part of!

I have personally been on Jack Bradley's heels ever since because the birth of his is ineffective assistance of counsel ways and nature was in question (but to what degree unknown at this point) since this subpar initial discovery request of 2011, but after this very day, I was indirectly assured he was not ethically and morally representing me in accordance with and of Professional Standards per his oath and law license in the state of Ohio (notice the extreme temperature change in correspondence from August 15 2012 throughout November 18 2013- each key email send and receive speaks volumes of the defendants direction, direct orders and position)! To my knowledge, this day the hearing was adjourned, not concluded (at this point Jack Bradley only waived the initial felony hearing, submitted the subpar discovery request and the subpar cross-examination of both troopers at the suppression hearing, compromised my constitutional protections and allowed my constitutional protections to be compromised. The defendant prepared and submitted the initial suppression motion to Jack Bradley to add onto its contents with only direct instructions not to remove or disturb any of its contents. Jack Bradley submitted the motion as was. As documented besides the legally questionable reconsideration motion submitted November 2012 against the defendants wishes and point 29 below, the defendant prepared every other motion prepared and submitted with the same directions and instructions, Jack Bradley never added on to the contents of any of the defendant's motion or instructions throughout the life of his representation to the contents of any of the defendant's motion or instructions throughout the life of his representation)!

29. Early August 2012 allegedly via Jack Bradley, the judge requested case law on a moot rental agreement argument, and/or around on August 14th 2012 Jack Bradley submitted a relevant motion of the same without the defendant's knowledge, communications, and permission and or input!

30. As documented on or around August 15 2012 the defendant sent an email to Jack Bradley's office which was confirmed received as always by his office immediately ordering Jack Bradley via the email content (see the key email sent and received dated August 15 2012) to amend the motion submitted without the defendants knowledge the day before with a detailed explanation of why! Not only did Jack Bradley completely ignore the defendants direct an immediate orders, in addition he completely ignored the defendant all together until on or around September 29th 2012 when the now retired judge render a confusing suppression decision that was ultimately in favor of the defendant as documented "GRANTED"!

31. At this point Jack Bradley informed me that the suppression hearing was allegedly not granted, and to keep quiet about the alleged "typo".

32. I appeared on a schedule court date as always, however where Jack Bradley's associate appeared on his behalf because he was allegedly out of town or something, however the sum total of this court date was right after the alleged "typo" decision, via Mr. Bradley associates for the better part of four and a half hours attempting to get me to entertain a plea that was not officially on the table (they were trying to immediately get me just to say that I would plea, in which I told them I did not care if they offered me one hour I was not waving my rights to appeal, and the associate replied, Mr. Jackson your right will be required to be waived, I firmly stated "NO", no other offers were ever mention. Upon exiting the courthouse I personally ran into Jack Bradley and immediately cut into him about these inappropriate games being played in my distaste for his overall representation, in addition of my distaste of him sending an associates that would take the better part of four and a half hours running back and forth into the restroom for all I know attempting to get me to take a plea, but knew nothing of the factual contents about my case.

33. Now in the intrium, I sent an email of how I felt to Jack Bradley direct refusal to communicate with me and my dislikes of him making decisions without my knowledge, direction, understanding or input, especially since he was not doing any of the initial paperwork any ways besides being a face of submission!

34. Finally for the first time since the birth of the suppression hearing, although all of our agreed correspondence will be that of emails because of the traveling distance between Buffalo, New York to Lorain, Ohio, for the first and only time during his representation (see correspondence dated on or around October 4th 2012, and see my immediate email sent and received immediately thereafter relevant), Jack Bradley mailed a correspondence to my home.

35. Again, see the immediate response to Jack Bradley's correspondence per the documented timeline.

36. There was a scheduled court date early to mid October 2012 although I appeared as always, Jack Bradley sent another associate that I had a distaste for, on my way home to Buffalo, New York from that court appearance, I received a phone call

personally from Jack requesting me to cut him some slack, stating he received some new case law identical to my issues from the higher court that will assure a desired victory of the suppression being granted although it was and is documented to date already granted! I told Jack I would do my research via my New York legal community, try Jack tried putting the ultimate rush on the mentioned reconsideration motion and my decision of the same.

Jack Bradley prepared and forwarded me a copy of a draft of a reconsideration motion for my approval. I purposely dragged my feet on the approval of the draft because I was not sure and I was awaiting word on the validity of the reconsideration motion under the suppression hearing rules, and my options to reconsider something that was already "granted" made no sense!

37. On or around November 5th 2012 against my document it wishes Jack Bradley filed the reconsideration motion that this writer's believes is not applicable under the suppression hearing rules once a decision is rendered, however since this motion was filed against my document it wishes, since the motion was filed, the defendant filed a supplement brief because of the dislike of the mentioned reconsideration motion Jack Bradley filed (see both reconsideration motions filed).

38. On or around December 7th 2012, there was a one page, one sentence decision denying the reconsideration motion (the questions how can you deny a granted motion? Or was the one page, one sentence denial regarding a suppression hearing rule that does not exist to this writer's belief, see the decision).

39. On or around December 19th and December 27th 2012, several more emails were sent and confirmed received (see emails), both emails contents spoke volumes however again both emails landed on deaf ears and we're completely ignored by Jack Bradley!

40. On or around February 8th, 2013 I was detained in federal custody on unrelated charges, although the federal prosecutor insisted on record they have been in direct communications etc, with the Lorain County Prosecutor's Office (see federal transcripts dated February 2013).

41. The only correspondence I would receive from Jack Bradley's office was court date reminders from his secretaries, which I received a court notification of March 18th, 2013 late February or early March, 2013 otherwise I was completely ignored by Jack Bradley since the December 2012 decision notification until this notification date.

42. On or around March 4th or 5th 2013- I sent key email sent and received ordering the prosecutor to produce me at court regarding avoiding any possible "speedy trial clock" disruptions regardless the cost finally and for some odd reasoning, immediately thereafter Jack Bradley responded back with an alleged prosecutors disposition.

43. Immediately thereafter, I address Jack Bradley about picking and choosing what emails he wanted to respond to etc., bail posted on federal allegations (in fact see all the key email sent and received throughout the rest of March, April, May, June and July all of 2013, all the email content speaks volumes and for the most part went completely ignored).

44. July 3rd, 2013 (see the demand for discovery request), where at the end Jack Bradley clearly tries to separate himself from the documented request that I have been asking of him dating back to 2011 verbally, and documented since August 15, 2012!

45. Continue to read the key email sent and received of July, August, September and October of 2013, again the contents of all spoke volumes but again landed on deaf ears, completely ignored by Jack Bradley!

46. On or around October 7th, 2013 per the July 2013 demand for discovery I received a partial response from the prosecutor (see partial response), which the prosecutor perjured himself by stating he never knew I was in federal custody (when clearly contradicted by the federal prosecutor, again see federal transcripts), the Lorain prosecutor also confirm Trooper Beyer's never requested or obtained warrants to legally gain entry to the locked vehicle (per Trooper Beyer's own suppression hearing testimony) on June 14 2012.

47. Continue to read emails sent and received, which all continues to speak volumes in highlighting ineffective assistance of counsel to the most despicable degrees, but not limited to.

48. November 18th 2013 Jack Bradley via one of his associates tried removing their office representation via an alleged failed financial obligation (see the court transcripts dated November 18th, 2013), in which the defendant highlighted the court with Jack Bradley's law firm ineffective assistance of counsel claim) ineffective ways and representation, the defendant also highlighted the court with the prosecutors direct refusal to produce the discovery. The July 3rd 2013 documents to discovery request (the prosecutor's refusal remains to this very day), the judge in return highlighted his bias disposition concerning Jack Bradley and the prosecutors! The transcript of this hearing speaks volumes, but not to mention this was the first time I've ever seen this new judge!

49. November 25th 2013, was the second time I've ever seen this new presiding judge (see transcripts, they also speak volumes), he basically confirms his bias disposition after appointing Mark Aufdenkampe as counsel, misrepresenting the record indirectly and speedy trial issues in which the prosecutors are already in violation of speedy trial as clearly documented throughout a great degree. Trial was scheduled early January 2014

50. Continue to read email sent and received, that continue to speak volumes!

51. Trial was scheduled for early January 2014, what was once again rescheduled to January 28th, 2014 for the prosecutors unreadiness for trial, then was rescheduled again for the prosecutors unreadiness for trial, again because of the troopers alleged availability issues for trial (in which this excuse was used several times throughout the life of this judicial process). Attorney Mark Aufdenkampe informs the defendant of the audio and video contents and lack thereof, however at this point the defendant has still not viewed the audio and video first hand yet!

52. Early February 2014 (see internal complaint against Trooper Beyer's) the defendant filed an internal complaint against Trooper Beyer's for falsifying the arrest report(s) and perjury for testifying to the same. The arrest reports in a suppression hearing transcripts was presented as evidence, and it was also conveyed to view the audio and video of the actual stop relevant.

53. On or around February 7th 2014 (see motion and the documented timeline of events filed), the defendant filed a motion highlighting the document a speedy trial issues, the judicial process, the denial of discovery, the precluding of evidence, judges bias disposition etc., the motion contents highlighting the document a timeline of events which HIGHLIGHTS ALL THE MENTIONED DOCUMENTATION REFERED TO ENCLOSED, however not limited to, subsequently the motion was verbally denied February 11 2014.

54. February 11th 2014, trail comment. Regarding the jury pool there was not one minority of any kind and just one individual who appeared of youth that was a police cadet or something.

It is this writer's opinion the pool process was tainted because the judge was allowing individuals to remain in the jury pool even after they clearly mentioned issues of conflict was immediate issues that brought about a conflict of interest.

Just as important the prosecutor knew the officers per the constitutional protections of the defendant, per the suppression hearing the troopers were severed, but the judge allows the prosecutor the place a key witness against the defendants at the prosecutor's table as a state representative and means not to serve the troopers testimonies to violate the defendants constitutional protections of a fair trial.

55. After opening statements, the audio and video of the actual stop was played to the jury, at which point this was also the first opportunity that the defendant had to witness the actual stop ever! I AM NO LAWYER BUT I DO KNOW MY 4TH AMENDMENT RIGHT AS DOES THIS JUDICIAL PROCESS! The prosecutor relied solely on this video, but again was not said and done per the audio and video spoke louder than any words period based on the documented record!

56. On direct examination and the answers of the same, open the doors to cross-examine in a line of questioning that would be normally hard to address based on

suppression/trial rules, however redirect examination opened the reserve vehicle for recross-examination.

Also there was no phase of Trooper Beyer's testimony direct or cross that was remotely consistent with the documented arrest reports individually or collectively including the suppression hearing testimony of June 2012, in fact all was very inconsistent to a grave degree!

57. Trooper Trader is called to the stand via direct and cross examination, his testimony was cocky and varied greatly from his suppression hearing testimony.

WHAT STUCK OUT THE MOST WITH HIS COCKINESS was when he perjured himself in regards to K-9 Argos abilities and inabilities for the constitutionally protected requirements for his duties as a handler and drug detection dog (SEE THE NEWLY DISCOVERED EVIDENCE/ CASE LAW SPECIFICALLY PERTAINING TO TROOPER TRADER AND K-9 ARGO, WHICH ULTIMATELY STATES K-9 ARGO IS CLASSIFIED PER THIER DOCUMENTED SERVICE RECORDS TO KNOWLING VIOLATES CIVIL AND CONSTITUTIONAL PROTECTIONS BEACUSE THE K-9 IS "HIGHLY PROMPT DEPENDANT" (CANT FIND DRUGS BEACUSE IT HIGHLY TRAINED TO SCRATCH ON DEMAND AND POSTURE), AND ALTHOUGH A K-9 IS REQUIRED TO INDEPENDENTLY FIND DRUGS 90% OF THE TIME WITHOUT A HANDLERS INTERFERENCE, AS DOCUMENTED K-9 ARGO ONLY FINDS DRUGS 59.09% OF THE TIME, AND FALSE ALERTS ARE JUST AS HIGH AS THAT NUMBER, WHICH PER THE REQUIREMENTS OF CORRECTING THE K-9 INABILITIES, THEY ARE PURPOSELY NON-EXISTANT, ULTIMATELY CLASSIFING THE DUO ILLEGALL, UNRELIABLE AND AS DOCUMENTED SHOULD NOT BE IN SERVICE, HOWEVER NOT LIMITED TOO), handler per because the video again, the K-9 did not independently hit on the vehicle, in fact he passed the location that was scratched Trooper Trader clearly changed his posture and taped (prompt) the exact area where K-9 Argo scratched, however

On cross-examination, when questioned about the prompting/ taping he purposely misinformed the court and the jury of his and K-9 Argos actions, in fact he gave a detail line of known perjury regarding, ending his testimony with Beyer's who was working up under him and his wings to do his thing, the same or similar statement.

58. Trial concluded for the first day.

59. February 12th 2014 I was 15 to 20 minutes late for trial via car troubles, although I was in direct communication with my attorney, in any event trial started without me, and on record the defendant clearly objected to that!

A DEA agent testified on direct and cross examination, although I do not know the full extent of that testimony as of yet because the trial transcripts are still pending, however per my attorney- Trooper Beyer's testified the day before that he did not hear the cell phone conversations while the defendant was illegally detained June 14 2011 until after

an alleged later review of the audio and video of the actual stop (which was clear perjury because he purposely left the cell phones in the Patrol Cruiser while the defendant was illegally detained and after being placed under arrest for a reason), THE DEA AGENT CONFIRMED THAT PERJURY BY TESTIFYING TO TROOPER BEYERS PERSONALLY TELLING HIM THAT HE HEARD THAT INFORMATION IMMEDIATELY ON THE HIGHWAY- THE PROSECUTOR OBJECTED BUT THE JUDGE OVER RULED! SO HERE WE HAVE ANOTHER GRAVE INCONSISTENCY COMMITTED BY TROOPER BEYERS!

60. In addition, after the jury was removed, I was questioning at length directly by the judge for being late, after the line of questions concluded, the defendant personally states on record of his immediate desired request to get both Trooper Beyer's and Trader back on the witness stand, when the judge eventually question why, it was stated for 4th amendment issues, in which the defendant personally prepare the argument for the attorney, but ultimately the request was denied because as stated "Trooper Beyer's was now out of state on vacation", and although Trooper Trader was seated at the prosecutor's table, the request to recross-examine him was denied as well, EVENTHOUGH TRIAL WAS ALLEGINGLY POSTPONED FROM 1/28/14 TO 2/11/14, FOR THE TROOPERS AVAILABILITES THROUGHOUT THE LIFE OF THE TRIAL!

61. Due to the fact the entire judicial process leading up to this point was extremely flawed, the jury instructions needs to be reviewed as well.

62. Also although unsure, it is this writer's believe that the verdict sheet was flawed because it did not contain the actual traffic ticket written June 14 2011. Again, this writer is unsure.

63. Just as important, upon reviewing the "newly discovered evidence" relevant the "professional dog report" and the attached case, IT IS VERY ALARMING OF THE IDENTICAL SET OF CIRCUMSTANCES, although unrelated of Trooper Trader and the K-9 Argo. The stop location was just about identical, "clear prompting/ prompted K-9 Argo to scratch the vehicle and just about the same location of the same type of vehicle, and the "ATTEMPTED/PRESENTED" the identical alleged wind argument that now Judge Zelaski would not entertain in my case to any degree at my documented suppression hearing (see suppression hearing transcripts), however the same when argument was presented during my trial February 11 2014 and Judge Maraldi digested it completely! What are the chances of these identical dynamics with the same K-9, trooper, location etc.? The elements of this profiling alone should be clearly investigated, not to mention is illegal.

64. "SPEEDY TRIAL VIOLATION CLEARLY RESIDES" (from June 14 2011 to February 11th 2014 almost 32 to 33 months), as documented- the defendant never waived his speedy trial right besides that of the suppression hearing process and the attached applicable rules in between November 18th - 25th of 2013, all the time period is charged to the prosecutor besides those periods mentioned and although the

prosecutor has only 270 days to conclude the defendant trial. The trial did not commence to almost twice that strict constitutionally protected allotted time, concluded there after!

Plus there is a very recent case from the higher courts of a girl name in case number presently unknown what the same set of circumstances as far as drugs in the Ohio Turnpike. She was also sentence to 11 years with MDO spec etc. that was just overturned for illegal search and seizure, however not limited too!

65. ATTENTIONS, although the enclosed is deriving from my acute memory based on my personal intimacy authoring the majority of the paperwork, please understand this correspondence is not a reattempt to try this case on this platform however this correspondence simply is to enlighten the various readers starting with Mr. Paul Griffin, Esq., but not limited to, of the magnitude of the grave nature documented enclosed of the documented facts, and once researched whole supported by the same documented facts/record!

Respectfully not to rub anyone the wrong way, it is acknowledged that Paul Griffin Esq. has been appointed counsel in this writer's opinion as documented from a bias platform, who is not edged stone, although Paul Griffin maybe a great man and ultimate professional, however Mr. Griffin has not yet sent me an introductory and or a courtesy letter at the very least to notify me that he filed a "notice of appeal" March 7th 2014 which in my eyes non correspondent is bad for business. The trial transcripts are still pending should be available mid April 2014, & I am exploring my options.

I understand the nature of this business, however no one's schedule does not outweigh the fight for my life, when no understanding or confidence has been established, and I say this respectfully!

Thank Jack Bradley who appears was violating the defendants constitutional protections before the birth of my suppression hearing by compromising the defendants rights himself and allowing them to be compromised by way of the prosecutors, but not limited to!

Therefore based on the following is clearly documented and supported by the same, from the date of the arrest June 14 2011 to date, this entire judicial process has been flawed to a grave degree!

One may feel what you may of the defendant, however there is no one case greater than justice, and perjury, prompting and falsifying documents (legal) not limited to arrest reports, knowing and willfully violating civil, due process and constitutional protections and intentions etc., outweighs the allegations of conviction! However there is nothing remotely consistent with the arrest reports, the audio and video of the actual stop, or the trooper's testimonies of the same, individually or collectively period. In fact they are inconsistent to a grave degree!

There is only one truth, but when you lie, this simplifies to parental teachings "IF YOU LIE, YOU HAVE TO CONTINUE TO LIE TO COVER A LIE", as the documented enclosed.

In America we allegedly have a judicial process, although broken in two phases and degrees, however the ethical and moral standards overall should be to protect the integrity of this process of civil, due process, amendments which some totals constitutional safeguards, protections and intentions, be it by way of Defense Council, prosecutors, the presiding judges or state or federal representatives who are authorized to birth or reside with the legally intended judicial process per their respective and tiers for the constitutional protection and the judicial process intentions.

Exhibited poisons cannot pursue alleged poisons!

Per the enclosed, the documented judicial process is and was clearly flawed and failing and or failed!

The illegal search and seizure, however not limited to is that of fruits from a poisonous tree, and the entire documented judicial process relevant the participating parties of Lorain County, that of Jack Bradley law firm for compromising the defendant's constitutional protections and allowing the same to be compromised, now retired judge Edward Zelaski for not protecting the integrity of the court, Judge Maraldi for not protecting the integrity of the court and exhibiting a bias nature as documented in the transcripts dated November 18th and 25th of 2013, and exhibiting the same behaviors not limited to residing over the documented trial, and finally the documented prosecutor throughout the life of this case number(s), in the prosecutors key ingredients being that of the state of Ohio Highway Patrol, not limited to Trooper Christopher Beyers, Michael Trader and the K-9 Argo Collectively the mentioned needs to United States and or federal review for the documented participants exhibiting RICO and MAFIA like behavior and symptoms, whereas the defendants illegal incarceration is fruits from a poisonous system!

To all the cc// parties, o have already obtained you address's respectfully, and I have already main steamed the entire documented record via PDF file, again minus the trial transcripts, however EVERYTHING ELSE RESIDES, including but not limited to the entire documented time line of events, motions, all the various hearing transcripts, all the email etc., simply put the documented record in its entirety. The actual audio and video should be attached in its entirety as well.

To further assist you, there is also a website presently under construction. Once completed, the immediate will be avail via all vehicles of social media, not limited to, however the documented record in its entirety will be highlighted there as well. There will also be a PR campaign of the same as well; no stone will be left unturned!

Sincerely, I would like to thank you all in advance for your time, efforts of research and patience, and in anticipation of your prompt response.

CC// Fernando Mack, Esq.

Rufus Simms, Esq.

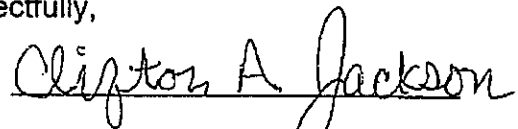
Paul Mancino, Esq.

Carl Monday of Channel 19 Action News

Tom Meyers of Channel 8 News

Reserved for the website presently under construction

Respectfully,



Clifton A. Jackson A652163

LORCI

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