

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

AB

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 "AB" IS REFERENCED IN ¶ 79 not limited too.

. Begin forwarded message:

> From: "Clifton A. Jackson" <jackson_clif@yahoo.com>
> Date: November 21, 2013 at 8:58:47 AM EST
> To: Pastor Ties <newgenerationchurch1@gmail.com>
> Cc: jackson_clif@yahoo.com
> Subject: Fwd: Entry Re: Pretrial preparations and addressing more personal concerns with you, frankly speaking of your correspondence to me dated October 24th, 2012, however not limited too, and lastly speaking, my grave concerns of all the ingredients of a collusion residing per my case number, and again the speedy trial and credibility issues throughout!

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> The smaller details is what defines the bigger picture!

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> Begin forwarded message:

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> From: Clif Jackson <jackson_clif@yahoo.com>
> Date: December 27, 2012 at 7:53:16 AM EST
> To: Maricelia <mari.jbradleylaw@centurytel.net>
> Cc: "a23hicks@gmail.com" <a23hicks@gmail.com>
> Subject: Re: Entry Re: Pretrial preparations and addressing more personal concerns with you, frankly speaking of your correspondence to me dated October 24th, 2012, however not limited too, and lastly speaking, my grave concerns of all the ingredients of a collusion residing per my case number, and again the speedy trial and credibility issues throughout!

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> Please confirm receipt of this email via email immediately please, thank you in advance!

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> Dear Mr. Bradley,

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> I will introduce this correspondence by generating the timeline as I understand and understood it from my personal knowledge and from you as my retained counsel regarding! Im not adding on or taking away from the truth, however, this timeline will lack exact dates in some areas, so I will give you on or around about times that will stand the test of the documented record to date!

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> A) June 14th, 2011 the arrest report, the foundation of this case number was generated, see arrest report! I never made any statements to date, and the conversation recorded illegally while I was illegally detained, should be dismissed for the very same reasonings!

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> B) I was arraigned and soon after you were retained as my counsel! Per your asking price, relevant, you are paid in full.

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> C) A felony hearing commenced soon after and bail was re addressed. Subsequently bail was made, inwhich

your office was contacted immediately, and a office visit was scheduled and commenced soon after. During that office visit and possibly prior to, via my sister you were notified that I would no longer be residing in the state of Ohio during this legal process, and based on the commute from New York to Ohio for court and office visits, we agreed upon emailing would be a viable option of communicating to avoid miss phone calls, lost or slow mailing process etc.! we've been emailing every since! Compare the vehicle of our email communications, to what has actually been sent to me via a postal carrier since you've been retained as my counsel to date, however from this particular point in time we were stuck in limbo because the case was not actually indicted, therefore we were not in county court. However, the time was running being charged to the peoples case!

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> D) The grand jury commenced, and a indictment relevant was issued per the docket or case number relevant, to me and subsequently I was re arraigned in lorraine county court regarding.

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> E) At this point, we've started and shared a detailed re pore of our strategic positioning leaning heavily on the suppression hearing based on the documented facts and or lack of at that particular point in time! The documented record to date is all per Trooper Beyers, written and or testimony wise, and all still remains constitutionally flawed and continues to lack the legal standings for a appropriate and legal conviction!

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> F) Discovery was requested, and forwarded to all the appropriate parties relevant, at which point you started your draft of your intended suppression motion, which you showed me during a office visit, at which point I shared with you my desires to have additional legal assistance in preparing the suppression motion. I shared with you that I mean no disrespect in my decision but it's my life, it's not about ego or profession, and at that point in time you appeared to be fine with my decision! I took your draft back with me to new york, and from this point forward the suppression motion was prepared solely from the new york side of my legal team, and once completed to my satisfactions, I personally forwarded the suppression motion to your office for submission and or service to the court and all appropriate parties relevant, sharing with you my desires for you to add on to this motion per ohio law but do not delete any of its contents, however this motion was submitted to the courts on or around November, 2011! Again, up into this point, all the time running thus far was being charged to the peoples, however you told me our suppression motion suspended the speedy trial clock!

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> G) However a little more or less then 10 months, I was giving court date after court date, that was always postponed for whatever reasonings, however I was always ready to proceed but clearly the peoples was not, and if infact it remains to be true of the suppression hearing suspending any speedy trial time frames, there must reside law and reasoning, on why theres almost a year of adjournments thats charged to the peoples case! Again, there was no reasons for any time to be charged to the defendant!

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> H) On or around mid July, 2012 my legal community new york side, started raising speedy trial questions, which you said did not exist, but the suppression hearing was scheduled soon after.

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> I) On or around August, 2012, the suppression hearing commenced, and Trooper Beyers and Trooper Trader testified under oath per the suppression hearing, which subsequently was adjourned before the completion of the same! At which point I asked you direct questions about the adjournments and the completion of the hearing, first question was "will we be able to give closing arguments, a summation so to speak after the judge review the onboard camara's? Your direct answer to my question was yes! My second question/statement was directly

related to Trooper Beyers attempting to base his probable cause issues solely around a alleged rental vehicle that he did not present or preserve per his arrest report, therefor that was all moot points, and his testimony was not consistant with the arrest reports he himself fabricated, and nor was the two Troopers testimony consistent with one another's, via the suppression hearing and or the actual arrest date, you agreed!

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> J) Approximately, 3 or 4 more court dates where scheduled, all to be adjourned peoples side again, in addition to the first court date after the suppression hearing adjournment, at court I asked you why the Troopers are not present, and you stated we do not want Trooper Beyers back on the stand, and that struck me as odd because he is basically the author of the record that clearly show he's lying and was not moving per the constitutional protections per the oath of his employment!

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> K) On or around August 15th, 2012, you told me we were waiting on the peoples written response and the judge asked you for case law relevant to rental vehicles, therefor you submitted that along with alleging other points you wanted to make, and you were waiting on the assistant district attorneys written response! Then we will be back in court to conclude the suppression hearing, summations etc. We never to this date received any written responses from the peoples nor was there any summation platforms to date! This particular day, you sent one of your associates to represent me at court, and I bumped into you upon exiting court and we spoke briefly! This is where our problems compounded, because on or around August 15th, 2012 I emailed you at length about points I wanted and what I wanted submitted, only to be ignored! The emails speak volumes for themselves. During this point for whatever reasons you were not accessable, nor was you responding to my emails, returning my calls and or addressing my concerns, nor did you make the proed! The emails speak volumes for themselves. During this point for whatever reasons you were not accessable, nor was you responding to my emails, returning my calls and or addressing my concerns, nor did you make the proper amendments! Most importantly, how would you submit anything without my input, when the entire record defence wise revolves around my input from the birth of me submitting the suppression motion and throughout my entire defence to date! You should have communicated about any and everything regarding this case number period before your submission of anything, especially when you have not made a single decision yourself relevant thus far, it defies logic and or common sence.

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> L) Finally, on or around October 1st, 2012, I was notified via email about the judges original flawed decision!

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> M) On or around November 5th, 2012, I appeared in court regarding, you were not present again, you sent one of your male associates to represent me. What was alarming, with my family present, was that this individual would take a better part of three hours in attempting to get me to take a plea, running back and forth to god knows where, but knew nothing factual of my documented case! Yes I have grave concerns in this area! The only logical explanation to this individual actions or lack there of, he never touched and or fami

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> N) I expressed my concerns to your office, and several days later I'd received a direct call from you about the new case law, per the reconsideration motion! Soon after your draft of the same came via email! As my email to you clearly states, I did not agree with the rush rush job of your submission and nor was I completely comfortable with the reconsideration motion in a whole, as I clearly stated via email to your office, because I did have the option not to submit a reconsideration motion! I emailed your office not to submit the motion until I was ready, and this was after i spoke with you via phone conversation we were talking a matter of hours, however

you and your office ignored that request blatantly because you acted as if we had no time regarding, seriously WHY? Also, why would you get so clearly offended when my New York legal community via a conference call through myself asked you several questions regarding speedy trial issues and other legal issues relevant? Although new york and ohio laws differs in some aspects, but constitutional laws and protections does not in this country, less alone state to state! Now here we stand, which the reconsideration motion resulted in a one page, literately a one sentenced denial, unheard of, whats really going on? Was the reconsideration motion a smoke screen of some sort, and If you dont know whats going on, then I suggest you start looking because its clearly a big problem! The question is who's participating in the problem, compared to who's working toward a appropriate and legal solution.

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> O) Now here I stand proceeding, waiting on a trial date, fighting for my life!
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> On or around December 10th, 2012, was when i last saw you, even as my lawyer in court! Before this date, I last seen you prior to the above date when the suppression hearing originally commenced, besides that, any representation from your office was that of one of your associates!

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> Infact, I'll take it one step further, since I was arrested June, 2011, I've only seen a appropriate court in my eyes, (1) when I was initially arrested, (2) the felony and bail hearing that followed, (3) the county court arraignment and (4) lastly the date the suppression hearing commenced solely! Every other court date relevant was via the judges chambers or where ever, bottom line unbeknownst to me or the actual court room with all parties present, so I could clearly see whats going on, if all was well or not, I need copies of all the transcripts avail to me, wether its from the judges chambers or where ever immediately please! How can a entire case be argued in the judges chambers or where ever, bottom line, outside of the defendants presence? How can that be legal and or fair when ones liberty is on the line?

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> I spoke of your correspondence to me dated October 24th, 2012. You attempted to make four points to me, first being, you've never ignored any of my correspondence directly or indirectly and that you made all the proper legal adjustment to the court, my question to you is how can you honestly take such a position? Look at the documented record to date, if there was a vested interest per the documented record so much more could and should have done! Your second point was that of your availability between August 15th, 2012 and the October flawed original suppression decision! My question to you would be how can you remotely fake this position when you've ignored every email from the August 15th date which again out lined my desired position in detail, however all my emails landed on death ears besides your secretary until you actually responded to my emails relevant October 24th, 2012, well after the fact! Your third point you attempted to make was that of a full suppression hearing and my failure to come in your office and myself being unreachable by phone! You contact me and reach me verbally and or relay messages when you want, and again emails have been our vehicle of correspondence, and if I missed any phone calls, I've returned the same immediately, and there has not been many missed phone calls, also how many calls have you not returned, and I will say this, there has never been a email from your office that I did not respond to period! Also, how can you consider any thing about the suppression hearing relevant a fair and full hearing when it was not clearly, and yes you filed a supplemental brief on your own without any input from your client, when your client has had direct input in every phase of this legal process thus far, you also ignored all your clients request regarding via emails! How can effective representation reside under the sum total of these conditions?

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> All my points made thus far has solely been per the documented record, and all my emails sent to your office,

was confirmed received via emails through your secretaries!

> And although my mention of a collusion may not sit well with you or may appear to be far fetched, I clearly beg to differ because all the ingredients clearly resides in my opinion!

> Also, again emails and conference call are always a viable option in preparing for trial and all other necessary legal interest and the communication there of, as they are when convenient for you! Respectfully for me, it's viable to avoid a half hour visit, a five hour drive, and the monies accompanying these travels!

> I would like to thank you in advance for your time and understanding relevant,

> Respectfully speaking,

> Clifton Jackson

>> On Dec 20, 2012, at 8:55 AM, "Maricelia" <mari.jbradleylaw@centurytel.net> wrote:

>> I was out of office yesterday. I received emails and forwarded to Jack

>> From: jackson_clif@yahoo.com

>> Sent: Wednesday, December 19, 2012 3:21 PM

>> To: Maricelia

>> Subject: Re: Entry

>> Please send email confirmation of receipt of this email, thank you in advance.

>> Please request copies of any and all transcripts of judges chambers conversations relevant recorded. I've seen the judge twice throughout this process to date. That was the county court arraignment and the first date of testimonies of the suppression hearing only! I requested copies of any hearings that were held without me present pre conclusion of that suppression hearing, but I was told no transcripts exist per your office.

>> Again, this request is paramount because to many decisions and conversations are on going without my knowledge and it appears without my best interest at heart per constitutional protections! If theres any transcripts that exist per this documented record that I do not have, forward me the same immediately please! In addition however not limited to, I need copies of any and all out going and incoming documentations regarding my case number, including but not limited to, the entire past and future documentations relevant to my case number in a whole!

>> Again, thank you in advance for your help and understandings relevant,

>> Respectfully Requested,

>> Clifton A. Jackson

>> Sent from my iPhone

>> On Dec 13, 2012, at 11:25 AM, "Maricelia" <mari.jbradleylaw@centurytel.net> wrote: