

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. 11CRD83104, NINTH DISTRICT COURT OF APPEALS CASE NO. 14CA010555, Not Limited Too.

# EXHIBIT

## AF

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 14<sup>th</sup>, 2011 AND OCTOBER OF 2015 TO THE BEST OF MY LAYMEN LEGAL ABILITIES.  
THIS EXHIBIT "AF" IS REFERENCED IN ¶ 84 not limited too.

From: jackson\_clif@yahoo.com  
Subject: Fwd: Court Notice  
Date: March 23, 2013, 11:15 AM  
To: Maricella marijbradleylaw@centurytel.net

Maricella, this email is a resend of the attached March 7, 2013 email without the errors, however as of today's date, I still have not received the requested materials. Please confirm received and give me a status up date on the requested materials and March 18,2013 court date. Thank you in advance.

Sent from my iPhone

From: jackson\_clif@yahoo.com  
Sent: Thursday, March 07, 2013 11:34 AM  
To: Maricella  
Subject: Re: Court Notice

Maricella, this email is continuation of the email you should have received dated March 5 2013 and was continued March 7, 2013, can you please confirm receipt of this email immediately please, thank you in advance.

Maricella also again, can you please forward me copies of the following ( I don't understand why Jack has you in stand by for his approval to send these documents)

- A) The initial arrest report: June 14, 2011.
- B) The indictment of the same.
- C) The discovery.
- D) The suppression motion filed November 2011
- E) The suppression hearing transcripts.
- F) The additional motion that was filed after the suppression commenced by me bradley early August 2012.
- G) The decision of the suppression hearing dated September 29 2012.
- H) The reconsideration motion Mr. Bradley submitted on or around late October or early November 2012.
- I) The amended motion of the reconsideration motion Mr. Bradley submitted per my request my last court appearance.
- J) The court decision of the reconsideration motion.
- K) A copy of the court documented docket sheet from June 2011 to date that will show how the time has been charged per every court appearance rescheduling etc.

Maricella, please mail me the above immediately to the following address.

Clifton A. Jackson  
Erie County Holding Center  
40 Delaware ave  
Buffalo, NY 14202

Thank you in advance. However please note I will continue to correspond with the office via emails as I have been since

2011. I need hard copies of the requested materials because all my legal materials were destroyed by only lord knows who when I was recently arrested.

Dear Mr. Bradley,

With all due respect, again, why have you not responded to any of my emails basically since mid August 2012?

Every email I've sent you, it's contents speaks volumes in all phases from the date of my initial arrest June 14, 2011 throughout the time frames of on or around November 4, 2011, the date the actual suppression motion was filed. All time in the dates mentioned above should be chargeable to the people.

Throughout on or around August 2012, the actual date the suppression commenced,

There were many court dates and appearances, only to be rescheduled because of the people's un readiness to proceed, again between November 4, 2011 in early August 2012.

Including but not limited to, the time frames of mid August of 2012 throughout on or around September 29, 2012 the date the actual suppression motion decision was rendered, again with the additional three or four more court appearances, only to be rescheduled again time after time.

Now from the time frames from late September 2012 until basically to date, possibly excluding a little more less than ten days for the reconsideration motion submission and decision of the same, the people's time resumed from on or around November 4, 2011,

Although the legalities exist between June 14, 2011 and August 2012 (possible as far back to the suppression hearing decision and possibly the reconsideration motion decision the latter part of 2012) possibly violating my constitutional protections.

The defendant from June 14, 2011 to date should have not been charged. For the stoppage of time for any reasons, and

Mr. Bradley, that's what you, my legal counsel have always led me to believe, besides the just in legal time perimeters per the legalities of a suppression hearing, in addition to how the clock stops and start of the same.

In fact the defendant has clearly been pushing the temple of this case throughout its conception. It has been the people's case in waiting and or laying in long time frames of silence, sum totally 21 months in counting to date.

Mr. Bradley between the dates mentioned above, you mailed me a correspondence dated October 24, 2012, in which I responded to that correspondence in email soon after, in which your office confirmed receipt of the same, in addition to confirming receipt to every other email I've ever sent to your office.

I've only received via email from your office for the most part, court appearances and confirmation of email(s) notifications from your secretary, a reconsideration motion draft, communications sum totally a confliction of the same the date you submitted the reconsideration motion late 2012, and finally the one page, one sentence denial of the reconsideration motion late 2012. Nothing else via emails or U.S. postage.

Once the suppression hearing commenced it was initially adjourned August 2012, you stated to me the judge wanted case law on rental vehicles. You submitted said motion without my input or knowledge. Once you brought this to my attention, I started emailing you regarding since August 15, 2012, directly requesting you to amend the same, only to be ignored, but your secretary confirmed receipt of all my emails sent to you immediately regarding. My issue with this was and still is, I acknowledge the fact you are a great lawyer and although you submit the paperwork, however you or your office have not solely prepared any of the motions presented and or submitted from this case conception thus far, however your ego has surfaced when my additional legal community have shown face.

Although many questions exist and were raised to you the best of my knowledge via a wrath of emails etc., besides the mention above, I have not basically heard from you period, although me or a family member continues to call your office regularly for updates and possible court activities relevant.

In addition but not limited to, my last two court appearances were heavily found-dated on plea attempts, where no actual plea offers was ever clearly on the table, it was or appeared to be some sort of check to see where I stood plea wise, and it's been back and forth this way my last two court appearances, and although I declined both attempts from June 2011 to date, I've maintained readiness for trial.

The plea attempts mentioned were the only conversations of a plea ever mentioned by either side.

Again late 2012, I emailed you several times, again confirmations received, after the reconsideration denial only to be ignored again until a court date notification for March 18, 2013 via email of a Pretrial hearing from your office.

Mr Bradley, what about drafts of motion(s) for I'm untimely prosecutions and all the many other grave legal issues that exist via this case, along with any and all other motions that should possibly be followed.

What about responding to your clients emails as they are sent regarding, that's full of substance, concerns etc., per the proper legal representation. The accumulation sum totally the abundance of, cannot be answered in one email, ignored and or be overshadowed.

Prepare whatever paperwork you must, to have me produced at court, because for no reason(s), do I want the time clock to stop on the people's case, although the people's are clearly in speedy trial violations, as well as the many others grave issues that exist relevant this case in a whole.

Please regarding to any and all responses, always first and foremost send a copy to my email.

Thank you in advance for your time and attention concerning, and in anticipation of your prompt response, not only of this email, I am still awaiting your prompt response of my last two emails sent to you immediately after the reconsideration motion denial. The two emails prior to the recent court notification of March 18, 2013

Sincerely,  
Clifton A Jackson

Thank you again!  
Clifton A. Jackson

Sent from my iPhone

On Mar 6, 2013, at 10:41 AM, "Maricelia" <[mari.bradleylaw@centurytel.net](mailto:mari.bradleylaw@centurytel.net)> wrote:

Received both emails and forwarded to Jack

From: [jackson\\_clif@yahoo.com](mailto:jackson_clif@yahoo.com)  
Sent: Wednesday, March 06, 2013 10:36 AM  
To: [Maricelia](mailto:Maricelia)  
Subject: Re: Court Notice