

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.

# EXHIBIT

## AH

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 "AH" IS REFERENCED IN ¶ 86 not limited too.

From: jackson\_cliff@yahoo.com  
Subject: Fwd: F.O.I.A. OR THE PROPER REQUEST TO CONFIRM CREDIBILITY ISSUE(S) THAT WILL BE PARAMOUNT IN PREPARATION(S) FOR TRIAL, AND POSSIBLE APPELLATE AND OR FEDERAL COURT(S) REVIEW OF THE OHIO STATE.  
Date: March 23, 2013, 5:47 PM  
To: Maricelia mari.jbradleylaw@centurytel.net

Again please acknowledge receipt of this email immediately please, thank you in advance!

Dear Mr. Bradley,

I am thoroughly aware of what happens Pretrial as well as post trial, that's why at this particular point in time, my language has clearly been in preparation for the possibilities of appeals, appellate and or federal court reviews, although

You may be a little thrown back by my rapid emails and their contents, With all due respect, this is not personal, this is business and about effective representation, however my personal disposition is that, I strongly feel we would not have been in this particular position if you had not convietntly ignored my emails, and appropriately manifested the credibility issues as I directly requested before, during and after the suppression hearings and their decisions.

Now based on the fire walls of my defense and arguments being more constitutional than state violations,

You have your angles of defense as I do mine(s). I have not deleted or deflated any of your tactics and or approach(s) thus far, I simply add on with substance founded on the documented facts as the people's case would do me, if the documented facts were beneficial to them,

And yes for me it's more personal, it is my life, and what you must understand respectfully,

The contents of my emails are not just a mere suggestion(s) on any level,

In addition to your lines and angles of defense, your are to incorporate the contents of my emails 100%, nothing about the contents of my emails are to be deleted or deflated on any level(s) period, in addition,

We are not to lie or lay dormant on any levels or lines of defense that will assist the people's case in any way, including but not limited to the enclosed, the speedy trial issue(s), the people's direct refusal to produce me at court knowing I'm being detained and where, because they have been in constant communications with one another, as it has been stated in federal court on more than one occasions, but the people's of the state of Ohio directly refused to produce me at court, now acting as though they are doing me a favor by not placing a detainer on me,

Please attempt to insult someone else intelligence, in recent emails, I've shared with you about the chargeability issue(s) of writs and my personal experiences of the same, however,

Based on your actions or lack there of regarding my emails, why are you picking and choosing what emails you want to, or are not responding to?

Your profession is a lawyer, however this case in which I hired you for is my life! This is no game for me, although respectfully, my direct disposition is very clear!

I've been practically begging you via a F.O.I.A or the proper request in the state of Ohio since Mid 2012 to confirm Trooper Beyers written report(s) and testimonies that L.E.A.D.S. out of service June 14, 2011, any per that date, and mainly at the documented time for the initial traffic stop! In addition,

The proper request to confirm any and all malfunctions to Trooper Beyers documented patrol cruiser per his written reports,

Again I have practically begged you to handle this request prior to the suppression hearing, during the suppression hearing in writing via emails dating back to August 15, 2012. Emails confirmed and received by your office however to this very date no avail. In fact,

You have ignored every and all emails sent to you regarding although all confirmed received until your correspondence sent US postage dated October 24, 2012 and

for the record why send that US postage when all other communications before and after the October 24 date was via email(s), although my response to that letter soon after via email you have only sent several emails from your office after that October 24, 2012 correspondence that you were in reference to the reconsideration motions in the sum total of, my disposition remained and remains consistent to date, however

Since the reconsideration denial you have again ignored every email sent to your office, although again all confirmed received relevant until your office sent a pretrial hearing notification for March 18, 2013, therefore respectfully,

Please do not tell me we've checked or addressed the credibility issue(s) of the mentioned Troopers, especially Beyers, again respectfully,

You have contested some aspect of the written reports and or testimony consisted of the same, however

You have never checked or confirmed via the F.O.I.A. or the proper we request, because per the proper Ohio State Highway Patrol Department logs, L.E.A.D.S. Being out of service, and any and all patrol cruiser malfunctions will be documented as well! This is a certified documentation that I want.

Again, this is the documentation I've been begging you to get since mid-2012, still to this very day to no avail, and

This is the one of the primary ways to check Trooper Beyers credibility in regards to his written report(s) and testimonies this writer strongly feels he manipulated! Therefore,

Again, I am respectfully requesting you to submit a F.O.I.A. or the proper request to confirm if the L.E.A.D.S. was out of service June 14, 2011, At any and all points of that day, in particular at 8:44 AM Trooper Beyers documented and testified to in addition.

A F.O.I.A. Or the property request per Trooper Beyers documented patrol cruiser of June 14, 2011, of any and all malfunctions including but not limited to his onboard camera, time stamped per that camera etc., as he documented and testified to, during direct examination at the suppression hearing, that it was notated issue(s), as any an all malfunctions should be, however

Above the request are extremely relevant and important, in preparation for trial, in hindsight of how this writer believes Trooper Beyers traffic stop was manipulated, violating this writer's constitutional protections regarding in various grave degrees(s), in addition

Why was the Judge timeline in his written suppression decision not only off, but clearly nonexistent, again it reads as follows:

A) The judge timeline reads at 8:40 AM - the time the traffic stop was initiated. The document a record reads the same happened at 8:44 AM!

B) The judge timeline reads at 8:42 AM Trooper Beyers requested K9 assistance, but per the documented record that had to have occurred after 8:44 AM, after initial traffic stop.

C) The judge timeline reads at 8:46 AM Trooper Trader arrives with the K9, however the documented record states that that happened at 8:50 AM.

D) The judge timeline reads at 8:48 AM the K9 alerted to the vehicle, however the documented record said that happened at 8:53 AM

Why all the inconsistencies, are these inconsistencies apart of the malfunctions in or manipulation(s) etc.?

Per my F.O.I.A. and or proper request regarding the enclosed, please forward me a certified copy of the same upon receipt. as well as mailing me copies of the prepared

paperwork requesting the same immediately please.

Only then can the credibility issue(s) be checked and confirmed for the readiness for trial and or for appellate and or federal court review purposes, regarding Trooper Beyers in his written reports and testimony.

Trooper Trader and his K9 Argo has credibility issue(s) as well, but their issues are of a different magnitude via the higher courts.

Also, you made a comment about the courts documented docket sheet not being accurate. Regarding my case, what is not accurate about the docket sheet?

Also, please show me in writing that the peoples gets 270 days for speedy trial because of my suppression motion!

In anticipation of your prompt response, and again forward me copies of the prepared of the enclosed request(s) and certified copies of the answers per our request immediately please,

Sincerely,  
Clifton A. Jackson