

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

AL

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 "AL" IS REFERENCED IN ¶ 90 not limited too.

<jackson-d-demand-6-13.DOC.pdf>

-----Forwarded message-----

From: mari.jbradleylaw@centurytel.net
To: jackson_clif@yahoo.com
Sent: Mon, Jun 17, 2013 8:21 AM PDT
Subject: Re:

Received

From: jackson_clif@yahoo.com
Sent: Monday, June 17, 2013 11:16 AM
To: Maricelia
Subject: Re:

Please acknowledge receipt of this email immediately, and again, as always thank you in advance.

Dear Mr. Bradley

Contact me and or wait for my written approval before the submission of any and all motion(s) (also send me all drafts of motions to my email before submission), including but not limited to the enclosed.

In a attempt to assist you in clarifying the exact specifics of my enclosed request, I will attempt to simplify it for you, in a paragraph below each numbered request as they are numbered below, since you and your office has stated your unsure of my desired request and thus far, have yet to attempt to contact me to gain understanding regarding, therefore,

Due to the facts, the people's witness list includes and or may be limited to Ohio State Patrol Troopers Beyers, Trader, and Argo but is not limited to, however,

Clearly the materials I am requesting is BRADY MATERIALS, that should allow me to face and address my accuser(s), and the informations should be accessible and or obtainable per the proper State of Ohio Departments and there respective (ed) logs, but not limited to, however all the enclosed request is paramount information for the up and coming trial and the possibilities and reservation(s) of future arguments regarding high lighting credibility issues of the documented Ohio State Troopers and or sum totaling the violations of constitutional protections regarding, be it appellate and or federal review(s)!

PERMISSION TO SUBMIT THE DEMAND FOR DISCOVERY MOTION ONLY AS DOCUMENTED ENCLOSED. IF ANY CHANGES ARE MADE PLEASE FORWARD DRAFT TO ME FOR APPROVAL BEFORE SUBMISSION TO THE COURTS!

Enclosed is a copy of the demand for discovery ONLY as I wish. Please do not delete any of the enclosed contents regardless if you think my request will be granted or not, however i do encourage you to add on where ever you may see fit to strengthen the enclosed per the appropriate rules per this motion in the State of Ohio!

(Mr. Bradley, the above paragraph(s) speaks for itself clearly, and please do not get frustrated, with no attempts of communicating with me in strengthening the enclosed per the rules and applications of the State of Ohio regarding Brady Materials and the totality of facing and addressing your accuser, and your legal representation of the same)

My desired request is as follows,

DEMAND FOR DISCOVERY

Now comes the defendant, Clifton A. Jackson, by and through the undersigned counsel, and hereby respectfully demands the following discovery pursuant to rule 16 of the Ohio rules of criminal procedure in the fourth, sixth and 14th amendments to the United States Constitution:

1. Copies of all relevant documents including supporting but not limited to there respective department(s) and the documented logs regarding the operational status of the L.E.A.D.S program, the exact date and specific time frame(s) of detention of June 14, 2011.

(Mr Bradley, the status of the L.E.A.D.S program was Trooper Beyers means of illegally manipulating, detaining and prolonging the original stop June 2011 in violations of my constitutional protections, but not limited to)

2. Copies of any and all documented report(s) per the proper departments and their documented logs regarding malfunctions of Ohio State Patrol Trooper Beyers patrol vehicle (per Trooper Beyer testimony), including the vehicle audio and video, but not limited to, the exact date of detention June 14, 2011.

(Mr. Bradley, Trooper Beyer(s) testified there were documented malfunctions of his patrol vehicle and its cameras, but not limited to the date and time of my illegal detention June 2011)

3. A full and complete (audio and video) copy of the traffic stop in it's entirety the exact date and time of detention June 14, 2011.

(Mr. Bradley, not only does this traffic stop show, there were no traffic violations video wise, but audio will further support the L.E.A.D.S program was fully operational the life of the stop, not just once the drugs were found)

4. Copies of any and all documented documents pertaining to the investigating and arresting officers radio transmissions, personal and or departmental cell phones used (at least 10 minutes before the actual stop was initiated and the entire stop in a whole if used) by the documented investigators and arresting officers, 911 calls, and dispatch logs regarding the exact date and time of detention June 14, 2011.

(Mr. Bradley, this request is copies of any and all means of communications used between and or per the documented investigating and or arresting officer(s), be it copies of radio transmissions, personal or departmental cell phones, copies of 911 calls and or dispatched logs, same or similar if used)

5. Copies of any and all documents of participation(s) and certifications (of the documented investigators and arresting officers) per Trooper Beyer(s) admission of participating in a profiling unit(s) that exact date of detention June 14, 2011.

(Mr. Bradley, although Trooper Beyers was extremely elusive on direct questioning, however he testified on

cross examination at the suppression hearing September 2012 to being on a profiling team the exact date and time of detention June 2011)

6. Copies of any and all relevant documentation(s) of request documented including but not limited to, copies of any and all radio transmissions, cell phone usage regarding, etc. requesting any and all assistance per the proper and legal request for a legally standing warrant(s) per constitutional protections as a United States Citizen, the exact date and time of detention June 14, 2011.

(Mr. Bradley, what means if any were used or documented attempts were made per the proper procedures and protocol per constitutional protections, in requesting a proper and or legally standing warrant(s) be it by way of radio transmissions, cell phone usage etc., were made? Or was everything done in attempts of pure manipulation(s) with no regards for constitutional protections, procedures or protocol)

7. Copies of any and all GPS tracking device(s) and or any device(s) (including but not limited to the tracking devices in the troopers cell phones) used to track and store data, of the patrol men and or his patrol vehicle(s) travels, specific placement(s) at specific times and speeds traveled, accompanied with the copies of the radio transmissions, and or cell phone usage approximately 10 minutes before the initial stop (and throughout the life of the stop) was initiated June 14, 2011. This request applies to both the patrol vehicles of Trooper Beyer's, Trader and Argo but not limited to and the requested information combined will highlight the nature of profiling accompanied with inconsistencies, and disregards for constitutional protections as exhibited per there profiling unit(s), the exact date and approximate time frames of the arrest June 14, 2011.

(Mr. Bradley, the GPS tracking devices, be it in or on the Troopers personal or departmental cell phones and or patrol cruisers will high light the inconsistencies of the Troopers actual accompanied (how they were position together) profiling positions the exact date and time of detention June 2011)

8. Requesting any and all copies of support, to show and or prove that the District Attorney's Office does not bear the burden to produce the body (the defendant) to a requested court proceedings if the defendant is knowingly detained (state or federal custody, in or out-of-state,) but (the defendant who is) directly requesting to be produced at the requested court date scheduled on or around March 18th, 2013 (in a respective time frame via the proper channels) to avoid any disruptions of the speedy trial clock (by way of Writ of Habeas Corpus in borrowing the body, Extradition, video conferences, etc., when the State of Ohio and the State of New York work hand in hand daily as one in the legal community, specifically speaking on the Western District of New York (federal bureau of prison and pre trial detainees) travels to Youngstown, Ohio daily commutes, but the ADA directly refused to produce the body. I am requesting any and all proof that the peoples can deny producing the body on or around March 18, 2013, and the time remains chargeable to the defendant.

(Mr. Bradley, I'm requesting the ADA to show me in law and writing, that its not their responsibilities to produce the body of the defendant(s) when he/she is knowingly detained (regardless the place and or state of detention) and is demanding the peoples to produce the body in protections of the speedy trial clock per constitutional protections)

9. Copies of any and all documentations regarding Ohio State's Troopers Beyer, Trader and the K-9 Argo. Requesting a thorough and complete copy of each Troopers arrest, convictions and overturned histories, declarations, reprimands, appellate returns, internal reviews, personal arrest reports, special trainings and any and all documentations in there personal files, internal and per freedom of information as avail being employees of the State of Ohio.

(Mr. Bradley, I'm requesting a thorough and complete copy of any and all materials that will high light the documented histories of Trooper Beyers, Trader and Argo as far as credibility issues in there handing of the same or similar cases and or situations)

10. Copies of any and all evidence and or materials that may have been beneficial (to the defendant case) and or withheld from the defendant.

(Mr. Bradley, I'm requesting any and all materials that may have been beneficial to the defendant and our defense in any way, that may have been with held from us, and that could possibly hinder our defense and or preparation(s) for trial)

I would like to thank you in advance for your time, patience, and understandings regarding,

Respectfully Submitted,
Clifton A. Jackson

Sent from my iPhone

On Jun 13, 2013, at 11:55 AM, jackson_clif@yahoo.com wrote:

Please confirm receipt of email immediately please.

Dear Mr. Bradley,

In paying close attention to the draft attached, I noticed your making it clear that you had nothing to do with the preparation of this motion, and to a degree that may be true, however

Although I do acknowledge, my presentation may not be up to ones professional standards, however it is my opinion that I must asked for my desired materials the best I know how, because the requested contents have eluded me for almost a year now from prior request of you directly, and trial is fast approaching, and the informations requested is vital for the up coming trial for various reasons!

What recommendations do you have in strengthening the attached motion without deleting the sum total of the contents that I'm requesting in my desired motion attached?

In anticipation of your prompt response,

Respectfully,
Clifton A. Jackson

Sent from my iPhone

On Jun 13, 2013, at 9:35 AM, "Maricelia" <mari.jbradleylaw@centurytel.net> wrote:

<jackson-d-demand-6-13.DOC.pdf>