

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

# AN

EXHIBITS A-AAAAE 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 "AN" IS REFERENCED IN ¶ 93 not limited too.

FILED  
 LORAIN COUNTY  
 2ND JUL 3 AM 10 09  
 COURT OF COMMON PLEAS  
 IN THE COURT OF COMMON PLEAS  
 LORAIN COUNTY, OHIO

STATE OF OHIO,	)	CASE NO. 11-CR-083104
	)	
Plaintiff,	)	
	)	JUDGE JOHN R. MIRALDI
vs.	)	
	)	
CLIFTON A. JACKSON	)	<u>DEMAND FOR DISCOVERY</u>
	)	<u>PREPARED BY AND AT THE</u>
Defendant.	)	<u>DIRECTION OF CLIFTON A. JACKSON</u>

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 and the Fourth, Fifth, Sixth and Fourteenth Amendments to the United States Constitution:

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

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

3. A full and complete (audio and video) copy of the traffic stop in its entirety the exact date and time of detention on June 14, 2011. Partial audio and video recording have been provided although the complete recordings have not been produced.

4. Copies of any and all 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 during the entire time of the stop) by the investigating and arresting officers including any 911 calls, and dispatch logs including but not limited to, the exact date and time of detention on June 14, 2011.

5. Copies of any and all documents relating to the participation and certifications of the investigating and arresting officers (per Trooper Beyer's suppression hearing testimony) of the officer's participation in a profiling unit(s) including but not limited to the exact date of detention on June 14, 2011.

6. Copies of any and all relevant documentation(s) of requests by officers including but not limited to, copies of any and all radio transmissions, cell phone usage, etc. requesting any and all assistance requested for a legally obtained search warrant per constitutional protections as a United States Citizen, during the date and time of detention on June 14, 2011.

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 troopers and or their patrol vehicle(s) travel, specific placement(s) at specific times and speeds traveled, accompanied with the copies of all radio transmissions, and or cell phone

usage approximately 10 minutes before the initial stop (and throughout the entire time of the stop) initiated on June 14, 2011. This request applies to both the patrol vehicles of Trooper Beyer's and Trooper Trader and K-9 Argo. The requested information will highlight the nature of profiling vehicles on the highway and demonstrate inconsistencies, and a total disregard for constitutional protections as exhibited by the Ohio State Highway Patrol profiling unit(s) during the exact date and approximate time frames of the arrest on June 14, 2011.

8. Requesting any and all copies of documents, to show and or prove that the Prosecutor's Office failed to produce the body (the defendant) to a scheduled court proceeding. The defendant was knowingly detained in State or Federal custody in or out-of-state and the defendant directly requested to be produced at the requested court date that was scheduled on or around March 18th, 2013. Defendant wanted to avoid any disruptions of the speedy trial clock. The State of Ohio failed to request the extradition or even a video conference when the State of Ohio and the State of New York cooperate in the transport of Defendant's for Court Proceedings. The Prosecuting Attorney never requested the transport of Defendant nor that the State of New York produce the body. Defendant requests any and all proof that the State of Ohio requested the body of Defendant on or around March 18, 2013, and the reasons why speedy trial time remains chargeable to the Defendant.

9. Copies of any and all documents in the personal files regarding Ohio State Troopers Beyer, Trader and the K-9 Argo. This request includes but is not limited to a thorough and complete copy of each Trooper's arrests, convictions and histories, including reprimands, appellate returns, internal reviews, personal arrest reports, special training and

any and all documentation in their personal files, pursuant to public records laws that apply to employees of the State of Ohio, as well as all applicable rules of discovery.

10. Copies of any and all evidence and or materials that may be beneficial to the defendant's case and /or withheld from the defendant that is exculpatory.

This Demand for Discovery was prepared solely by the Defendant with assistance in corrections of grammar only by Counsel. This Demand for Discovery was filed by Counsel for Defendant at the direction of Defendant that no deletions (additions from effective counsel have always been welcomed) of the enclosed contents be made therein.

Respectfully submitted.

**JACK W. BRADLEY CO., LPA**



**JACK W. BRADLEY (0007899)**

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**CERTIFICATE OF SERVICE**

A copy of the foregoing Demand for Discovery was served on the State of Ohio by forwarding a copy of same to the Lorain County Prosecutor, 225 Court Street, 3<sup>rd</sup> Floor, Lorain, Ohio 44035 on this 2<sup>nd</sup> day of July, 2013.



Jack W. Bradley