

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 1-555] 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

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EXHIBITS A-AAAE (EXHIBIT "R") 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.

>
>
> The smaller details is what defines the bigger picture!
>
> Begin forwarded message:
>
> From: "Maricelia" <mari.jbradleylaw@centurytel.net>
> Date: October 22, 2013 at 12:15:08 PM EDT
> To: <jackson_clif@yahoo.com>
> Subject: Re: New Court Date, Balance Owed, Trial Date and The demands of discover requested.
>
> Received-Confirmed
>
> From: jackson_clif@yahoo.com
> Sent: Tuesday, October 22, 2013 11:53 AM
> To: Maricelia
> Subject: Re: New Court Date, Balance Owed, Trial Date and The demands of discover requested.
>
> Ms Mari,
>
> Please confirm receipt of this email immediately please, also yesterday we were giving a partial response to my Brady request pending, can you please send me a copy of that partial response in its entirety via email immediately as well.
>
> Also, send me via email, a copy of my next court date, and the trial date of December, and as always Ms. Mari thank you in advance!
>
>
>
>> On Oct 21, 2013, at 11:04 AM, "Maricelia" <mari.jbradleylaw@centurytel.net> wrote:
>>
>> Confirmed-Received
>>
>> From: jackson_clif@yahoo.com
>> Sent: Monday, October 21, 2013 9:14 AM
>> To: Maricelia
>> Subject: Fwd: New Court Date, Balance Owed, Trial Date and The demands of discover requested.
>>
>> Ms Mari, please confirm receipt of this email immediately please, as always thank you in advance.
>>
>> Sent from my iPhone
>>
>> Begin forwarded message:
>>
>> From: jackson_clif@yahoo.com

FILED
LORAIN COUNTY
2013 OCT 17 PM 2 04
COURT OF COMMON PLEAS
RON NABAKOWSKI

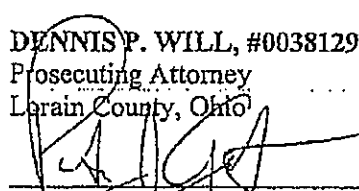
IN THE COURT OF COMMON PLEAS
LORAIN COUNTY, OHIO

STATE OF OHIO,)	CASE NO. 11 CR0 83104
)	
Plaintiff)	
)	JUDGE JOHN R. MIRALDI
vs.)	
)	INITIAL RESPONSE TO
CLIFTON A. JACKSON)	DEFENDANT'S DEMAND
)	FOR DISCOVERY PREPARED
Defendant)	BY AND AT THE DIRECTION
)	OF CLIFTON A. JACKSON
)	

Now comes the State of Ohio, by and through the office of the Lorain County
Prosecuting Attorney and hereby provides it's Initial Response to Defendant's Demand
for Discovery.

Respectfully Submitted,

DENNIS P. WILL, #0038129
Prosecuting Attorney
Lorain County, Ohio


By: PETER J. GAUTHIER, # 0055774
Assistant Prosecuting Attorney
225 Court Street, 3rd Floor
Elyria, Ohio 44035
(440) 329-5394

RESPONSE

As to requested item 3: All videos and audios that are available to the State have already been provided to defense counsel.

As to requested item 6: There was no search warrant in this case.

As to requested Item 8: The defendant posted Bond on this case on June 28, 2011 in the Vermilion Municipal Court, thus he is not incarcerated on this case. In addition, the defendant has waived speedy trial on multiple prior occasions. Lastly, there has been provided no notification prior to the March 18, 2013 scheduled pretrial that the defendant was in Federal custody and wished to be transported to Ohio for this pretrial. Since no warrant was pending in Ohio for the defendant, there would be no cause for extradition.

As to requested item 9: Officers personnel files are not the subject of discovery.

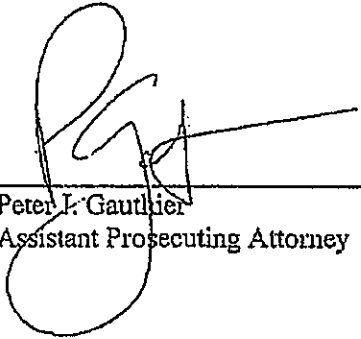
As to requested item 10: All evidence and materials regarding any potentially exculpatory (there is none) has been previously addressed by the State.

Respectfully submitted,


Peter J. Gauthier

PROOF OF SERVICE

A copy of the foregoing Initial Brief in Response to Defendant's Demand for Discovery, has been hand delivered on this ____ day of October, 2013 to Jack Bradley, Esq., Attorney for Defendant.



Peter J. Gauthier
Assistant Prosecuting Attorney