

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 268 MOTION TO REOPEN STATE OF OHIO v. CLIFTON JACKSON, CASE NO. 11CR083104, NINTH DISTRICT COURT OF APPEALS CASE NO. 14CA010555, Not Limited Too.

# EXHIBIT

# AS

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 "AS" IS REFERENCED IN ¶ 98 not limited too.

12/24/13

Print

Subject: FW: ORIGINAL DATED OCTOBER 28th, 2013 Re: Response/Notice  
From: jackson\_clif@yahoo.com (jackson\_clif@yahoo.com)  
To: RamonIrizarryEsq@gmail.com; markaattomey@gmail.com;  
Cc: Jerome.davis9@gmail.com; newgenerationchurch1@gmail.com; jackson\_clif@yahoo.com;  
Date: Saturday, December 21, 2013 5:34 PM

Sent from my Samsung Galaxy S@ 4 mini

Sent from my Samsung Galaxy S@ 4 mini

<br><br>----- Original message -----<br>From: Clif Jackson <jackson\_clif@yahoo.com>  
<br>Date:12/21/2013 2:22 PM (GMT-05:00) <br>To: jackson\_clif@yahoo.com <br>Subject: FW:  
ORIGINAL DATED OCTOBER 28th, 2013 Re: Response/Notice <br><br>

----Forwarded message----

From: mari.jbradleylaw@centurytel.net  
To: jackson\_clif@yahoo.com  
Sent: Tue, Oct 29, 2013 5:26 AM PDT  
Subject: Re: Response/Notice

Received

-----  
From: <jackson\_clif@yahoo.com>  
Sent: Monday, October 28, 2013 7:04 PM  
To: "Maricelia" <mari.jbradleylaw@centurytel.net>; "Angel" <msangelinyles@yahoo.com>; "Rome"  
<jerome.davis9@gmail.com>  
Subject: Re: Response/Notice

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

>

> Dear Mr Bradley

>

> Regarding my pending Brady demands, I am deeply concerned with the District Attorneys elusive and purposely misleading behaviors and demeanor, and for the possibilities of appellate and or federal court reviews, it must be preserved for the courts and so noted for the record by your office, and or generated by myself

>

> I am just as concerned with you regarding the attached response and your documented disposition and or the lack thereof past or present, in allowing directly or indirectly the district attorneys office stall tactics and inappropriate behaviors to reside against my/our defense, for the following reasons

>

> 1) most important, the operational status of the L.E.A.D.S program is easily accessed by the District Attorney Office directly and or indirectly, it's a vast part of there structural make up regarding DUE PROCESS and CONSTITUTIONAL protections, therefor why have it been a little more or less then four months now, that the District Attorneys Office have been eluding there own easily accessible and available logs directly or indirectly regarding my pending Brady request?

>

> 2) why is the District Attorneys Office standing mute picking and choosing what Brady materials demands and or request to respond too regarding my pending motion? Here is my factual concerns of the District Attorney misleading partial response,

>

> a) as highlighted and documented in the pending Brady Request, per you Mr Bradley my legal representation, we have only received partial video and or audio footage of the initial stop, As clearly documented in your office attempts to forward me the disc of the actual stop, however in all the attempts made from your office to get me a operable copy of the disc of the actual stop in its entirety, every copy sent was completely blank, no audio or video, which was and still is to date consistent, with the documented DEA initial reports relevant.

>

> However as documented in the attached partial response, more specially in regards to point 3, the DA is clearly stating he turned over all the audio and video footage of the initial stop June 14th, 2011. WHY IS THIS COMPLETE AND THOROUGH AUDIO AND VIDEO COPY ELUDING THE DEFENDANT TO DATE, be it from the district attorney office or my defense counsel? Audio does exists some where, because the initial arrest report highlights a alleged detailed conversation while the defendant was illegally detained in trooper Beyers patrol cruiser!

>

> Although as to point 6, the DA did confirm there were no search warrants in regards to the proper procedures of breaking into that locked vehicle June 14th, 2011 etc,

>

> b) however point 8, is clearly misleading in nature and ethics, simply put perjury! Here's the reasons why, I have documented emails confirmed received from your office notifying you to take the appropriate steps to have the DA produce me at court by any and all means, there were no acceptable excuses or possible misunderstanding regarding my desired positioning March 18th, 2013, dating back to on or around March 06th, 2013 and your immediate email response of alleged dialog with the District Attorneys Office immediately there after relevant to there disposition, Which translated to me, there direct refusal to produce me in court! In addition I also have FEDERAL COURT TRANSCRIPTS dated February 15th, 2013, where the federal assistant DA states on record both district attorney offices of Buffalo and Ohio had and has to date a open dialog in relations to both open cases! SO FOR THE DISTRICT ATTORNEYS OF OHIO TO STATE THEY DID NOT KNOW I WAS IN FEDERAL CUSTODY IS NOT ONLY MISLEADING BUT IT IS CLEAR PERJURY!

>  
> c) as to point 9, it is the defendant CONSTITUTIONAL RIGHT to address his accusers! As documented, there clearly resides credibility issues and concerns!  
>  
> Mr. Bradley, this case has exceeded multiple documented issues for immediate grounds for dismissal,  
>  
> Thank you in advance for your time and concerns as document, in anticipation of your prompt response,  
>  
> Respectfully Submitted,  
> Clifton Jackson  
>  
>  
> Sent from my iPhone  
>  
> On Oct 24, 2013, at 4:28 PM, "Maricelia" <mari.jbradleylaw@centurytel.net> wrote:  
>  
>  
> <jackson-c-response-notice.10-24-13.DOC.pdf>  
>

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