

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

AT

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 14th, 2011 AND OCTOBER OF 2015 TO THE BEST OF MY LAYMEN LEGAL ABILITIES.
THIS EXHIBIT "AT" IS REFERENCED IN ¶ 100 not limited too.

My address is listed below.

If you have any questions, please feel free to contact me.

Sincerely,

Cathlene M. Camp
 Official Court Reporter
 Lorain County Common Pleas Court
 225 Court Street, 7th Floor
 Elyria, OH 44035
 (440) 329-5564 <%28440%29%20329-5564>

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

From: cathlene.camp@gmail.com
 To: jackson_clif@yahoo.com
 Sent: Mon, Dec 16, 2013 12:07 PM PST
 Subject: Fwd: Transcript of Proceedings - 11/18/13

Clifton, here is your transcript from the 11/18 matter.
 Thank you,
 Cathy

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

From: "Cathlene Camp" <cathlene.camp@gmail.com>
 Date: Nov 19, 2013 3:49 PM
 Subject: Transcript of Proceedings - 11/18/13
 To: <jackson_clifton@yahoo.com>
 Cc:

Mr. Jackson,

I have attached the transcript you requested from Monday's hearing. The total cost to prepare the transcript is \$27 made payable to Cathlene Camp. My address is listed below.

If you have any questions, please feel free to contact me.

Sincerely,

12/24/13

Print

Cathlene M. Camp

Official Court Reporter

Lorain County Common Pleas Court

225 Court Street, 7th Floor

Elyria, OH 44035

(440) 329-5564 <%28440%29%20329-5564>

1 State of Ohio,)
) SS:
2 County of Lorain.)

3 IN THE COURT OF COMMON PLEAS

4 The State of Ohio,)
5 Plaintiff,)

6 vs.) NO. 11CR083104

7 Clifton A. Jackson,)
8 Defendant.)

9 * * *

10 COMPLETE TRANSCRIPT OF PROCEEDINGS HAD IN THE
11 ABOVE-ENTITLED MATTER ON THE 18TH DAY OF NOVEMBER, 2013,
12 BEFORE THE HONORABLE JOHN R. MIRALDI, PRESIDING JUDGE OF
13 SAID COURT.

14 * * *

15 APPEARANCES:

16 Appearing on behalf of the State of Ohio:

17 Lorain County Prosecutor's Office
18 By: Peter Gauthier, Assistant Prosecuting Attorney

19 Appearing on behalf of the Defendan

20 Jack W. Bradley Co. LPA, by:
21 Michael Stepanik, Esq.

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P R O C E E D I N G S

1
2 MR. GAUTHIER: Your Honor, this is State of Ohio
3 versus Clifton Jackson, Case Number 11CR083104. Your
4 Honor, this matter is set for pretrial this morning;
5 however, Mr. Stepanik indicated there was an oral motion he
6 would like to make at this time.

7 THE COURT: Good afternoon, Mr. Stepanik.

8 MR. STEPANIK: Good afternoon, your Honor.

9 THE COURT: Good afternoon, Mr. Jackson.

10 THE DEFENDANT: Good afternoon, sir.

11 THE COURT: What's going on?

12 MR. STEPANIK: Your Honor, I talked to Mr. Jackson
13 today, and I had advised him that we think it may be best
14 for him to maybe have new counsel on this case. I talked
15 to him on a couple different issues that we were having.
16 You know, there was some financial obligations that he
17 failed to meet. And I know that Mr. Jackson had told me
18 today that there was somebody else from his family that was
19 going to be calling to make those financial arrangements,
20 but I think that the reality is that there have been some
21 questions by him about our representation. We feel as
22 though we've been doing the best job possible. I know a
23 lot of the filings and the motions he hasn't been happy
24 with and has been contacting our office and making us aware
25 of that and wanting certain things written a certain way.

1 I suppose, long story short, I think Mr. Jackson
2 needs somebody to look at the case with fresh eyes. I told
3 him today I think he would be better off with a new
4 attorney under the circumstances of our relationship, with
5 his relationship with our office, and the obligations not
6 being met. He can address the court on that issue if he
7 would like. I don't think that he would object to it,
8 though.

9 THE DEFENDANT: Yeah, I would like to put
10 something on the record, not so much about payments.
11 Counsel been ineffective. Everything's been submitted. I
12 had on there there's no follow-through that I've been
13 seeing. This case been going on almost 30 months now, a
14 little bit more or less. I've been waiting for discovery
15 almost five months now, more or less, and representing
16 ineffectively. Beyond the fact of just asking for money,
17 you need to do what you need to do up until that point.
18 And I don't even see where the initial monies went because
19 everything that was submitted, it was submitted on my
20 behalf. I agree I need fresh eyes on the case. My
21 grievance has nothing to do with payment arrangements.

22 THE COURT: Thank you, Mr. Jackson. State of
23 Ohio.

24 THE DEFENDANT: I'm sorry.

25 THE COURT: That's all right.

1 MR. GAUTHIER: Your Honor, the only thing I want
2 to address, judge, is the discovery issue. Discovery, as
3 far as the State's concerned, has been provided to
4 Mr. Jackson through counsel. Mr. Jackson has requested
5 some additional information, which, quite frankly, the
6 State is of the opinion is not part of discovery. However,
7 just to get this case moving, because it's been going on so
8 long, I have responded in part to that, and I will respond
9 to second part of it as well; although, I still maintain
10 the stuff he's asking for is not discovery. I will try and
11 get him whatever he's requesting, if it even exists.

12 THE COURT: All right. Mr. Jackson, this case is
13 set for trial a month from yesterday. Do you have counsel
14 in mind that you're going to retain?

15 THE DEFENDANT: No. All of this is new. Can I
16 put something on the record based on what the DA said,
17 because I know --

18 THE COURT: The DA. The district attorney?

19 THE DEFENDANT: Yes.

20 THE COURT: From where?

21 THE DEFENDANT: From Ohio, what this gentleman
22 just said behind me.

23 THE COURT: Okay, sure.

24 THE DEFENDANT: As far as the information that's
25 put in that I asked for directly, I have two witnesses

1 against me: Ohio State Troopers. The information I asked
2 in my motion is extremely relevant because it's credibility
3 issues. I also asked for copies of the logs of the LEADS
4 program that was done. That's directly related to the
5 district attorney's case because it's part of the due
6 process structure. Everything I asked for was relevant to
7 this trial and relevant to my defense because there is a
8 trial date less than a month from now.

9 And I will answer your question, your Honor, no.
10 Again, this new legal representation is a situation that
11 came up today. So, actually, I would need to be appointed
12 counsel.

13 THE COURT: You're saying you don't have the
14 funds?

15 THE DEFENDANT: Yes, sir.

16 THE COURT: Are you willing to swear on an
17 affidavit to the court that you don't have the funds to pay
18 for a private attorney?

19 THE DEFENDANT: Yes, sir.

20 THE COURT: That's a serious statement; you're
21 aware of that?

22 THE DEFENDANT: Yes, sir.

23 THE COURT: So let's back up a little bit. Based
24 on your response to Attorney Stepanik, you don't have any
25 problem with his office withdrawing; you believe they have

1 been ineffective?

2 THE DEFENDANT: Yes, ineffective assistance of
3 counsel.

4 THE COURT: This isn't something that's simply
5 one-sided where the attorney is saying we haven't been
6 paid, we want out -- that's part of it -- but you believe
7 that they have been ineffective as your lawyers, true?

8 THE DEFENDANT: Yes, sir. In addition to that,
9 the informations that I've been asking for and this recent
10 discovery, I have documentation dating back over a year ago
11 now I've been asking for these, and right after the initial
12 discovery request and before you came on the bench
13 before the other --

14 THE COURT: Judge Zaleski.

15 THE DEFENDANT: I've been asking for the same
16 information. So everything that I'm asking for is not just
17 up and coming now.

18 THE COURT: Well, my job is to referee --

19 THE DEFENDANT: I understand.

20 THE COURT: -- these disputes. It's probably not
21 necessary that I say this, but I feel like I should say it.
22 Attorney Jack Bradley is probably the most professional
23 attorney that we deal with here in the courtroom. And by
24 professional, I mean respectful, capable, simply one of the
25 best. And I would say that about his office as a whole.

1 So he rarely, rarely requests to step down from a case. I
2 just want you to know that moving forward, because we're
3 not going to get to the point where if I appoint someone
4 for you, we're go to have this kind of hearing again; we're
5 going to have a trial.

6 THE DEFENDANT: Absolutely, sir.

7 THE COURT: All right.

8 THE DEFENDANT: I'm very aware up to this point.
9 I'm also aware that Mr. Bradley is one of the best here.
10 I've shared this sentiment with him on multiple occasions,
11 but I also share the sentiments if he's not applying it to
12 me, he's not the best for me. And everything that's been
13 submitted so far, if you look at my motions, I basically
14 been, you know what I mean, sharing that sentiment with the
15 courts at the same time.

16 THE COURT: All right. Before you are formally
17 off the case, I want to go over the affidavit. Is there a
18 formal motion that you want to make at this time?

19 MR. STEPANIK: Your Honor, at this time we would
20 seek, both myself and Mr. Bradley, to withdraw as counsel
21 of record for Mr. Jackson.

22 THE COURT: Based on the following statements made
23 on the record here, the court will grant defense attorney's
24 request for withdrawl. Mr. Jackson, you're going to fill
25 that out. We've handed you an affidavit of indigency for

1 you to fill out. Once that's completed, we will consider
2 your request for new counsel, a court-appointed counsel.

3 THE DEFENDANT: Okay. You want me to fill that
4 out now?

5 THE COURT: You probably should. Anything else?

6 MR. STEPANIK: No, your Honor.

7 MR. GAUTHIER: No, your Honor.

8 THE COURT: Very good. Thank you, gentlemen.

9 * * *

10 HEARING CONCLUDED

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C E R T I F I C A T E

The State of Ohio,)
) SS:
County of Lorain.)

I, Cathlene M. Camp, Official Court Reporter of
the Court of Common Pleas, Lorain County, Ohio, do hereby
certify that this is a correct transcript of the
proceedings in this case on November 18, 2013.

I further certify that this is a complete
transcript of the proceedings on that date.

IN WITNESS WHEREOF, I have subscribed my name
this 19th day of November, 2013.

Cathlene M. Camp, RPR
Official Court Reporter
Court of Common Pleas
Lorain County Justice Center
Elyria, Ohio 44035
(440) 329-5564