

CLIFTON JACKSON AFFIDAVIT AND APPENDIX OF EXHIBITS ARE NUMBERED [first two cover pages of affidavit unnumbered, iii-ixii] 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

F

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 "F" IS REFERENCED IN ¶ 54 not limited too.

**September 8, 2011**

**Clifton A. Jackson  
47 Oxford Street Upper Apt.  
Buffalo, NY 14209**

**ENCLOSURE**

**Enclosed Please find:**

**✓ Motion For Discovery**

Law Office  
**JACK W. BRADLEY CO., L.P.A.**  
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IN THE COURT OF COMMON PLEAS  
LORAIN COUNTY, OHIO

STATE OF OHIO	)	CASE NO. 11CR083104
	)	
Plaintiff,	)	JUDGE EDWARD M. ZALESKI
	)	
vs.	)	
	)	
CLIFTON JACKSON,	)	<u>NOTICE OF COMPLIANCE WITH</u>
	)	<u>DISCOVERY REQUEST</u>
Defendant	)	

In response to the Defendant's request for Discovery the Prosecution provides as follows  
per: Crim.R. 16(B):

1. Defendant's / Co-Defendant's Statements:

Please refer to Ohio State Highway Patrol Report No. 11-10115-1090 and discovery materials.

2. Defendant / Co-Defendant Prior Record:

Defendant, Clifton Jackson:  
Burglary 1995 - New York  
Petit Larceny 1997 - New York  
Unauthorized Use of Vehicle 1998 - New York  
Resisting Arrest 1998 - New York  
Petit Larceny 1998 - New York  
Robbery 1999 - New York  
Possession of Stolen Property 1999 New York  
Unlawful Possession of Marijuana 1999 New York  
Unlawful Use of Telephone in Furtherance of a Drug Trafficking Crime 2003 - New York  
Conspiracy 2007 - New York  
Criminal Possession of Marijuana 2008

3. List of documents of which copies are being provided pursuant to Crim.R. 16(B)(3) & (4):

9 Photos of Vehicle and Drugs  
Cruiser video - 1 DVD

**\*The State intends to use all evidence referenced in the police report / Discovery materials. \*Counsel is advised to contact the Ohio State Highway Patrol Milan to make an appointment to inspect any tangible evidence not otherwise provided.**

4. **Exculpatory Evidence:**

None known to the State of Ohio at this time.

5. **Arresting Agency Report(s):**

Ohio State Highway Patrol Milan Report - 11-010115-1090 - 24 pages

6. **Witness Statements:**

Please refer to police report and discovery materials.

**Crim.R. 16(C):**

The following items have been marked as COUNSEL ONLY:

None.

**Crim.R. 16(D):**

The following items have *not* been provided to Defense Counsel pursuant to Crim.R. 16(D):

None.

**\*See Certificate of Nondisclosure filed separately with the Court.**

**Crim.R. 16(I):**

Witness List:

Individuals from the Ohio State Highway Patrol Milan Post including, but not limited to: Trooper Beyer, Trooper Trader, Sgt. Dechoudens.

DEA Agent Taliano  
Witness re: Lab reports

Crim.R. 16(K):

Expert Reports:

Lab Reports forthcoming

Respectfully submitted,

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

By:



LAURA ANN DEZORT, #0059460  
Assistant Prosecuting Attorney  
225 Court Street, 3<sup>rd</sup> Floor  
Elyria, Ohio 44035  
(440) 329-5394


**PROOF OF SERVICE**

This is to certify that a copy of the foregoing *Notice of Compliance with Discovery*

*Request* was received by:

\_\_\_\_\_ on \_\_\_\_\_, 2011.

Attorney Jack Bradley



LAURA ANN DEZORT  
Assistant Prosecuting Attorney