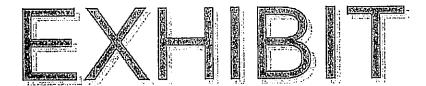
CLIFTON JACKSON AFFIDAVIT AND APPENDIX OF EXHIBTS ARE NUMBERED (first two cover pages of affidavit unnumbered, iii-ixiii] IN ROMAN NUMERAL. EXHIBIT PAGES ARE CROSS REFERENCED AS APPENDIX (Appendix Pages are numbered1-655) PAGES. AFFIDAVIT AND EXHIBITS ARE IN SUPPORT OF 268 MOTION TO REOPEN STATE OF OHIO v. CLIFTON JACKSON, CASE NO. 11CR083104, NINTH DISTRICT COURT OF APPEALS CASE NO. 14CA010555, Not Limited Too.





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 14th, 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.
520 BROADWAY, 3RD FLOOR
LORAIN, OHIO 44052
PH: (440) 244-1811
FAX: (440) 244-3848

IN THE COURT OF COMMON PLEAS LORAIN COUNTY, OHIO

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

In response to the Defendant's request for Discovery the Prosecution provides as follows

per: Crim.R. 16(B):

1. <u>Defendant's / Co-Defendant's Statements</u>:

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

2. <u>Defendant / Co-Defendant Prior Record:</u>

Defendant, Clifton Jackson:

Burglary 1995 - New York

Petit Larceny 1997 - New

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

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		
	Ву:	Respectfully submitted, DENNIS P. WILL Prosecuting Attorney Lorain County, Ohio Supreme Court #0038129 Manufacture LAURA ANN DEZORT, #0059460 Assistant Prosecuting Attorney 225 Court Street, 3rd Floor Elyria, Ohio 44035 (440) 329-5394
		<u>SERVICE</u>
	foregoi	ng Notice of Compliance with Discovery
Request was received by:		
	on	, 2011.
Attorney Jack Bradley		
		LAURA ANN DEZORT Assistant Prosecuting Attorney