

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 1-855) 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

L

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 "L" IS REFERENCED IN ¶ 63 not limited too.

Sent from my iPad

Begin forwarded message:

From: Clifton Jackson <jackson_clif@yahoo.com>
Date: August 15, 2012 5:11:12 PM EDT
To: Aaron Hicks <a23hicks@gmail.com>
Subject: Fwd: Points that i want included in the summation per the on going suppression hearing!

Sent from my iPad

Begin forwarded message:

From: Clifton Jackson <jackson_clif@yahoo.com>
Date: August 15, 2012 5:04:41 PM EDT
To: "jbradleylaw@centurytel.net" <jbradleylaw@centurytel.net>
Subject: Points that i want included in the summation per the on going suppression hearing!

In addition to all our actual submitted arguments per this hearing and or case in a whole, after my review of the suppression hearing transcripts (which the transcripts as they were prepared left me in a alarmed state because there was extensive testimony where trooper Beyers actually went into a dialouged detailed numeric formula (see suppression hearing transcripts page 5:6-13) of how he personally interpreates the traveling to closely to a vehicle statue, which was not consistant with ohio state law, which was challeged and denounced per the actual law as its written and quote of the same by Mr. Bradley, see suppression transcripts page 27:3-23! Here are additional reason(s) (why we should move for a dismissal) why this case should be dismissed on its face and per the state of ohio and constitutional law. The suppression hearing testimony was not at all consistent with the arrest report! Trooper Beyers says L.E.A.D.S (see arrest report) were down the day and time of the initial arrest, he also says his patrol vehicle cam was malfunctioning (see suppression hearing transcripts page 10: thur page 11:23) as far as time wise the date and time of the initial traffic stop and arrest. Due to the fact(s) of trooper beyers elusive behaviors, including but not limited to his refusal of being forth right about the profiling team he was on and directly working with the day of the arrest, based on the troopers credibility issues these alleged facts of malfunctioning(s) should be documented in the proper departments of Ohio state patrol. I'm sure if we check for these alleged malfunctions (please check, I'm sure it will prove he's lying), they would not exist, also it's impossible to determine if a vehicle is traveling to closely from 300-400 feet away, when you never passed or attempted to at least pull along side of the alleged violating vehicle.

Both troopers, Chris Beyers and Michael Trader testimony per the suppression hearing(s)

compared to the alleged documented facts which in this case are parimount and defies logic, law and common sense, inwhich both troopers were extremely elusive and inconsistent and simply put not forth right per the initial alleged stated and documented facts per the actual documented arrest report(s) and the sum total of, compared to there actual suppression testimony of the same. In fact, both officers testimony and or personal and professional legal dispositions have been that, they are above the law and protocal and have not been on one accord through out this entire process legally and or professionally. See suppression hearing transcripts pages 31-33:2-15.

PLEASE NOTE 1,s are for the arrest report timeline, and 2,s are for the suppression hearing troopers testimony. Example A1) actual documented arrest report and A2) actual suppression hearing testimony.

A1)per the arrest report trooper beyers states as follows: while on patrol on the ohio turnpike at milepost 135 EB (brownhelm twp), i observed a silver 2010 toyota camry, following a mobile home in front of it by 2-3 car lenghts away in the right lane at approximately 60-65 mph. At the time i observed the violation i was in the middle lane 300-400 feet behind the vehicle, which i initiated a traffic stop of the vehicle at milepost 137EB. Per the arrest report, the Initial stop was at 8:44 a.m, exactly there after per the arrest report and trooper beyers a extensive line of alleged probing questions ensued before returning to his patrol vehicle in- which none of the questioning was consistant with a traffic violation (this process took any wheres from 3-5 minutes itself), at which point trooper beyers radioed trooper trader and ask that he and his K-9 partner, argo, come to my location and do a sniff of the vehicle, also see suppression transcripts page 22:13-16.

A2)per the suppression hearing testimony pages 22-27:19-6, trooper Beyers, changes his initial patrol location and initial observation of Clifton Jackson to the crossover mile marker 133 from the documented 135 milepost (see suppression hearing transcripts page 4:20-24), in addition, again per suppression hearing transcripts page 5:2-4, trooper Beyers states "it was observed following the motor home in front of it in the right lane about 2-3 car lengths away, which is extremely close and a traffic hazard. A major question exists, was Clifton Jackson in front of the motor home or behind it? See suppression hearing transcripts page 6:6-9, where as trooper Beyers clearly states that from his initial observation of Clifton Jackson, he never lost sight of him, but as stated in the same transcripts, the weather conditions were clear and the rode conditions were light, therefore why did it take a little more or less then four miles (see suppression transcripts pages 18-20:19-16 to execute a traffic stop? This also defies logic and common sense! There is no proof of how long I was behind that mobile home, besides what trooper Beyers says, and again he perjured himself because I drove up on that motor home, I did not trail behind that motor home as trooper Beyers stated, that's why he could not get any violation on his vehicle patrol cam in the good weather conditions and light traffic! As his patrol cam shows, I approached the motor home and past it within law and reason! Therefore, it defies common sense that it took a mile in a half to two miles to safely pull me over with good weather conditions and light traffic again!

B1)per the arrest report, trooper trader arrives on the scene at 8:50 a.m! That in itself, how is that mathmatically possible? Common sense will state that trooper trader was extremely close to arrive on the scene within almost seconds it appears per the documented timelines, keeping in mind, trooper beyers constantly stated that all Clifton Jackson actions and move- ments were slow and deliberate in nature (see suppression transcripts page 9:12- page 10:9).

C1) per the arrest report, at 8:51 a.m, trooper beyers states as follows: a review of my in car audio/video tape AFTER THE STOP WAS OVER revealed the below cell phone conversation (please see arrest report, at 0851 hours), however per the arrest report time line 0853, please see arrest report, the alleged statements documented clearly contradicts the timeline and its contents of 0851, inwhich per the arrest report 0855 a.m, a probable cause search ensued!

Per the arrest report and its documented timeline, all the above took place on the ohio turnpike In a matter of 8 to 9 minutes, the initial stop, extensive questioning, alleged slow responses, call for back up and or K-9, arrival of the same, the start of a alleged probable cause search etc., in addition throughout this entire process L.E.A.D.S per the arrest report was out of service during the initial stop, which all clearly defies logic, law(s), protocol and common sense!

Per the suppression hearing testimony trooper Beyers clearly states the weather conditions was clear and dry, he also states the rode conditions were litc. See the suppression hearing transcripts page 16:4-14, when trooper Beyers was clearly asked by the assistant district attorney if he witnessed the K-9 hit on the vehicle, where as Beyers clearly answers yes but clearly refused to answer the question of where the dog hit at! Why was trooper Beyers being so elusive of what he witnessed while on duty per his traffic stop? Theres only one truth, in addition but not limited too also when asked the direct and identical question by Mr. Bradley (see suppression transcripts pages 30-31:18-1), trooper Beyers answer clearly differs!

Clearly as established, trooper trader (see suppression hearing transcripts pages 42-44:1-14) and his K-9 argo are not reliable per there job description as stated per the higher and neighboring courts relevant, also clearly both troopers do not have there lies together! Every aspect of this case derives off of trooper Beyers accounts of this traffic stop and subsequent arrest, however trooper Beyers is extremely uncredible regarding! It's like trooper Beyers is speaking that of a profile not actual accounts of wrong doing, and clearly in this case he obtained fruits from a piosonist tree! He was so excited to obtain those fruits, he attempted to beg the DEA to take the case, but they refused because the contents did not fit there criteria and the nature and legality of the stop was clearly in question!

Sent from my iPad