

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. 11CR023104, NINTH DISTRICT COURT OF APPEALS CASE NO. 14CA010555, Not Limited Too.

EXHIBIT

P

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 "P" IS REFERENCED IN ¶ 66 not limited too.

Subject: Fw: RESPECTFULLY REQUEST THE IMMEDIATE AMENDING OF MY SUMMATION BRIEF
SUBMITTED-DOCUMENTS ENCLOSED

From: Cliff Jackson (jackson_cliff@yahoo.com)

To: jbradleylaw@centurytel.net;

Cc: mari.jbradleylaw@centurytel.net; mk.melo0320@gmail.com; a23hicks@gmail.com;
luanng@lotempioandbrown.com;

Date: Wednesday, October 3, 2012 4:32 PM

DEAR MR. BRADLEY,

Please confirm receipt of this email immediately please,

I've attempted to contact you directly through various vehicles of communications, including but not limited to emails, direct phone calls, etc., all to no avail. I've received confirmations of emails and personally left many messages for you to personally return my phone calls and or respond to urgent emails regarding my legal troubles, again to no avail between the most important time frames of September 11th, 2012 to date of October 03rd, 2012 and counting thus far.

In communicating with your office, although pleasant, simply put, we are handcuffed to basically relaying and receiving messages from or for you, because I've never had your direct information as far as your personal cell phone number, and or personal extension at your law office etc., again sum totaling no direct communication besides the relaying and receiving of messages. I've been trying to contact you directly, to no avail since September 11th, 2012 via email and phone communication through your law office.

From the time of my arrest to date, I've been led to believe there have been no postponements on the defendants behalf to date from you directly and your law office, in which I the defendant concur because there have been no reason for the defendant to stop or be charged for time stoppage to date! However, the peoples have been requesting and granted adjournments throughout the birth of this legal process consistently to date, including but not limited to, to 2 through 3 adjournments alone during the suppression hearing after the start of the same! I the defendant does not even know when the suppression hearing concluded, for the following reasons,

On or around September 10th, 2012 at the suppression hearing proceedings relevant, although you were not present, said hearing was subsequently rescheduled again to September 24th, 2012 for what ever reasoning behind closed doors.

Upon leaving the court house, we bumped into one another and spoke briefly, at which point you directly told me " we were waiting on the written response from the District Attorney Office, from your written summation that was already submitted by you or your office because per you, you said the judge requested case law on or about the rental vehicle"!

Based on your statement to me immediately above, I drafted the attached email and sent it to you and or your office September 11th, 2012! Your office confirmed receipt of the same immediately! The attached email clearly states my positioning based on the documented record as it stands to date, including but not limited to, because I the defendant does not even know when the suppression hearing was concluded! My direct question to you is how could you let that happen as my legal representation, again in addition to but

not limited to, my direct request and your direct refusal directly or indirectly to amend the alleged written summation you spoke about September 10th, 2012, in reference to the attached email dated September 11th, 2012!

I've been directly involved in every aspect of the preparations and submissions of documents to the courts per this case docket number besides this alleged written summation that was submitted without my knowledge, input and or legal positioning! However, when I sent you my legal positioning in the form of the attached email dated September 11th, 2012 directly requesting you to amend the alleged written summation submitted by you or your office behalf, you directly refused to return countless phone attempts and or respond to the attached email dated September 11th, 2012!

I've been trying to contact you regarding since September 11th, 2012, because of your failure to respond to me and my attempts to contact you regarding the needed amendments relevant to the written summation submitted by you or your office for the September 24th, 2012 suppression hearing date, nothing you and or your office was corresponding to me appears to be accurate because, I personally requested your office to forward me the transcripts for the September 24th, 2012 hearing, in which I was ultimately told by your office there were no transcripts because that hearing date of 09/24/2012 was reschedule again until November 05th, 2012 for what ever reasoning, however here we stand and the judge ruled on your written summation not the amended I directly asked you to do, and the district attorneys office response of the same obviously, in addition but not limited to, the judges ruling is some what confusing, denying on the face page but granting on the sum totaling of his ruling on the last page, in addition to the judges ruling being inconsistent with the documented facts, legal arguments, time lines, testimonies and or the initial arrest report in addition to the Ohio state and Constitutional law!

THE EMAIL I SENT TO YOU DATED SEPTEMBER 11TH, 2012 ADDRESSED ALL THE ISSUES, CONFLICT IONS AND OR TESTIMONIES PER THE DOCUMENTED FACT(S) AND OR DOCUMENTED RECORD TO DATE, THEREFORE WHY WOULD YOU DIRECTLY AVOID COMMUNICATING WITH ME DIRECTLY FROM THE TIME FRAME(S) OF SEPTEMBER 11TH, 2012 TO ON OR AROUND OCTOBER 02ND, 2012, VIA EMAIL WITH THE ATTACHED RULING FROM THE HONORABLE JUDGE EDWARD M. ZALESKI? IN ADDITION, I'VE CONTACTED YOUR OFFICE CONSISTENTLY, WITHOUT A RESPONSE FROM YOU DIRECTLY TO DATE AS NOTED IN THE ENCLOSED TIME FRAMES! BASED ON THE SERIOUSNESS OF MY CIRCUMSTANCES, THIS IS NOT EFFECTIVE REPRESENTATION WHEN YOU AND OR YOUR ACTIONS ARE DIRECTLY REFUSING TO SUBMIT THE APPROPRIATE PAPERWORK PER THE DOCUMENTED RECORD THAT'S POSSIBLY CONDEMNING TO THE PEOPLES CASE AND OR THERE WITNESS'S!

I would like to thank you in advance for your time concerning,
Respectfully Submitted,
Clifton A. Jackson
Dated October 03rd, 2012

----- Forwarded Message -----

From: Cliff Jackson <jackson_cliff@yahoo.com>
To: "msangelmyles@yahoo.com" <msangelmyles@yahoo.com>; Maricelia <mari.jbradleylaw@centurytel.net>
Sent: Tuesday, September 11, 2012 2:39 PM
Subject: Fw: RESPECTFULLY REQUEST THE IMMEDIATE AMENDING OF MY SUMMATION BRIEF SUBMITTED-DOCUMENTS ENCLOSED