

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION

CLIFTON A. JACKSON, et al., :
Plaintiff(s), : Case No. 2:17-cv-163
vs. : CHIEF JUDGE SARGUS
OHIO STATE HIGHWAY PATROL, et al., : MAGISTRATE JUDGE JOLSON
Defendant(s). :

PLAINTIFFS' REQUEST FOR LEAVE TO AMEND THEIR COMPLAINT PURSUANT FED.CIV.R. 15 (a); AND LEAVE TO SUPPLEMENT THEIR COMPLAINT TO INCLUDE ADDITIONAL INJURIES WHICH HAVE HAPPENED SINCE THE DATE OF THE PLEADING SOUGHT TO BE SUPPLEMENTED PURSUANT TO FED.CIV.R. 15(d); AND CLASS ACTION STATUS PURSUANT TO FED.CIV.R. 23(a)&(b)(1)(a)(b),(2), and (3)?

Now comes the Plaintiff(s) and respectfully moves this Honorable Court for leave to amend their complaint pursuant to Fed.Civ.R. 15(a); and leave to supplement their complaint to include additional injuries which have happened since the date of the pleading sought to be supplemented pursuant to Fed.Civ.R. 15(d); and class action status pursuant to Fed.Civ.R. 23(a)&(b)(1)(a)(b),(2), and (3).

Plaintiffs' requests to amend, supplement, and obtain class action status is more fully set forth in the attached Memorandum in Support.

Respectfully submitted,



Clifton A. Jackson, et al.,
#A652-163
Lake Erie Correctional Inst.
501 Thompson Road
P.O. Box 8000
Conneaut, Ohio 44030

PLAINTIFF(S) CLASS MEMBERS

MEMORANDUM IN SUPPORT

I. SPECIFIC FACTUAL ALLEGATIONS

Plaintiff(s) asserts that their original complaint stated the deprivations [illegal acts] dates of occurrence for each named Defendant(s), also that each of their actions continue to date, as stated in the body of Claim Numbers 1 through 17, and paragraphs 31 through 47, clearly stating the names of each Defendant, and the injuries their acts caused Plaintiff(s) to suffered, also stating their complaint was a Civil Rights Complaint under Civ.R. 3, and 42 U.S.C. §§1981, 1983, 1985(3), 1986, and 1988(b)(c). Knowing that their claims have merits, and believing that they would not be able to obtain justice from a judge, they invoked their Constitutional Right to Trial by Jury pursuant to Civ.R. 8 and the Sixth Amendment. Which was filed on January 20, 2017, in the Court of Common Pleas for Franklin County, State of Ohio, where Defendant-1 [Ohio State Highway Patrol main branch place of business], which was assigned to Judge - David C. Young, and Civil Case No. 17 CV 000616. The Honorable Judge Young scheduled initial joint disclosure of all witnesses for June 9, 2017, also scheduled supplemental joint disclosure of all witnesses for August 4, 2017. A trial confirmation date was scheduled for August 18, 2017, and dispositive motions scheduled for October 27, 2017, and discovery cut-off deadline scheduled for November 10, 2017, and decisions on motions scheduled for December 22, 2017. Final pre-trial conference/order (or both) for January 9, 2018, and trial assignment scheduled for February 5, 2018. On or about February 23, 2017, United States Attorney, Benjamin C. Glassman filed a "CERTIFICATION OF SCOPE OF EMPLOYMENT" and invoked federal jurisdiction over the complaint and removed the action too THE UNITED STATES DISTRICT COURT, FOR THE SOUTHERN DISTRICT OF OHIO, EASTERN DIVISION, which was assigned Case No. 2:17-cv-00163. Which was also assigned to United States District Judge SARGUS.

Plaintiff(s) are now requesting leave to obtain Class Status, and to amend their complaint to include a detailed description of each Defendant(s)' actions or non-actions

under the color of law which fully supports the Plaintiff(s)' claims 1 through 17, and paragraphs 31 through 47. Also Plaintiff(s) are requesting leave to supplement their complaint with a detail description of each Defendant(s)' actions or non-actions which makes them liable for the injuries pleaded in the body of Claim Numbers 1 through 17, and paragraphs 31 through 47.

AMEND/SUPPLEMENT AS CLAIM NUMBER 1a:

¶31a. Plaintiff(s)' specific factual allegation actions or non-actions of Defendant - Ohio State Highway Patrol by its actions or non-actions in failing to protect Plaintiff(s) from acts of discrimination of racial profiling committed on June 14, 2011, 08:39:17 to 08:51:00. These specific actions were performed under the color of law by Ohio State Highway Patrol's troopers and employees who infringements and encroachments were racially motivated to deprive Plaintiff(s) of constitutional rights, privileges or immunities secured under provisions of the Fourth, Fifth, Eighth, and Fourteenth Amendments to the United States Constitution by allowing its troopers to engage in overt actions in furtherance of implementing policies of the Defendant - Ohio State Highway Patrol in place to discriminate against citizens because of their race on June 14, 2011-June 4, 2012-February 11, 2014-June 22, 2015-February 2, 2017-February 24, 2017-March 1, 2017, and continuing to date "April 11, 2017", also foreseeable and unforeseeable future injuries. Plaintiff(s) seeks to hold Defendant - Ohio State Highway Patrol liable based on their role in supervisory the troopers who allegedly committed constitutional violations when Defendant - Ohio State Highway Patrol implicitly authorized, approved or knowingly acquiesced in the unconstitutional conduct of Defendants Christopher Beyer, Michael Trader, and K-9 Argo (subordinate)." Plaintiff(s) wish to supplement his original claim number 1, to include **Supervisory Liability** as a back up claim in case Plaintiff(s) cannot succeed on their **Respondent Superior** claim. Bellamy v. Bradley, 729 F.2d 416, 421 (6th Cir. 1984). Because Plaintiff(s) have pleaded facts which, if proven, would entitle them to relief, dismissal is inappropriate. See Exhibits A through AAAE, of Plaintiff(s)' Affidavit in Support of Request for Leave to File Appellant's Application for Reopening of Direct Appeal.

AMEND/SUPPLEMENT AS CLAIM NUMBER 2a:

¶32a. Plaintiff(s)' specific factual allegation as to actions of Defendant - Christopher Beyer a State Trooper employed by Defendant - Ohio State Highway Patrol, on June 14, 2011, 08:39:17 to 08:51:00, and in the performance of his official duties his conduct violated clearly established constitutional rights by racial profiling. Defendant - Christopher Beyer specific actions were performed under the color of law and racially motivated and designed to deprive Plaintiff(s) of constitutional rights, privileges or immunities secured under provisions of the Fourth, Fifth, Eighth, and Fourteenth Amendments to the United States Constitution and Laws. Plaintiff(s)' asserts that the traffick stop and investigation into Plaintiff - Clifton A. Jackson's [hereinafter "Plaintiff-1"] presence on Ohio's Turn Pike by Defendant - Christopher Beyer, was the direct result of enforcement of a written or unwritten policy of Racial Profiling being implemented unconstitutionally against United States Citizens traveling on Ohio's Highways and Turn Pike, who happen to be minorities. Plaintiff(s)' asserts that Defendant - Christopher Beyer engaged in overt actions in furtherance of implementing a written or unwritten policies of the Defendant - Ohio State Highway Patrol in place to discriminate against citizens in Ohio because of their race on June 14, 2011-June 4, 2012-February 11, 2014-June 22, 2015-February 2, 2017-February 24, 2017-March 1, 2017, and continuing to date "April 11, 2017", also foreseeable and unforeseeable future injuries by this Defendant (Christopher Beyer). Plaintiff(s)' seek to hold Defendant - Christopher Beyer liable based on his conduct violating clearly established constitutional rights of which a reasonable person would have known. **Christophel v. Kukulinsky**, 61 F.3d 479, 484 (6th Cir. 1995). On June 14, 2011, Defendant - Christopher Beyer being racially motivated and acting on such bias, performed a traffick stop of Plaintiff-1 (an African American) driving East bound on the Ohio Turn Pike, was an unreasonable violation of Plaintiff-1's Fourteenth Amendment right to be free from discrimination on the basis of race. Plaintiff(s) asserts that after being stopped for an alleged traffick violation, and even though Defendant - Christopher Beyer asked Plaintiff

-1 for his drivers license and documents, once Defendant - Christopher Beyer observed Plaintiff-1's drivers license were New York license (Buffalo), he immediately went back to his cruiser without even receiving the requested credentials. On June 14, 2011, 08:42:08 a.m., is the time that Defendant - Christopher Beyer walked back to his cruiser, and it is clear through Plaintiff(s)' star-key-witness [Exhibit A, audio & video of Defendant - Christopher Beyer's cruiser], that he did not possess Plaintiff-1's drivers license nor a rental agreement in his hand. Defendant - Christopher Beyer instead of writing Plaintiff-1 a traffick ticket, and send him on his way, Defendant - Christopher Beyer went on a fish hunt because of Plaintiff-1's race, and called Defendant - Michael Trader to perform and air sniff with Defendant - K-9 Argo. On June 14, 2011, 08:45:30, after calling for Defendants Trader and Argo, Defendant - Christopher Beyer never reviewed or checked LEADS with respect Plaintiff-1's drivers license because he never took the license - - to his cruiser to check. See Exhibit A. Defendant - Christopher Beyer exist his cruiser prior to Defendants Trader's and Argo's arriving, returns to Plaintiff-1's vehicle at 08:45:40 a.m., immediately stated "everything checked out" without ever running a check or review on LEADS of Plaintiff-1, and at that time asked Plaintiff-1 if he would accompany him back to his cruiser! On June 14, 2011, 08:46:10 a.m., Plaintiff-1 while existing his vehicle secured it (locked the vehicle's doors), then believing he had no choice, walked back to Defendant - Christopher Beyer's cruiser with his cell phones and key remote. Prior to Defendant - Christopher Beyer placing Plaintiff-1 in the back of his cruiser, he searched Plaintiff-1 to make sure he had no weapon(s) then secured him in his cruiser's back seat. On June 14, 2011, 08:47:00 a.m., Plaintiff-1 starts a cell phone conversation, at 08:47:55 a.m., Defendants - Michael Trader and K-9 Argo comes into view of Defendant - Christopher Beyer's cruiser video camera and B-Lines straight to Plaintiff-1's vehicle. See Exhibits A and J [Sentencing Hearing Transcript, June 4, 2012, Page 13, Lines 9-10]. Plaintiff(s) asserts that the traffick stop was an unreasonable seizure on June 14, 2011, 08:48:46 to 08:51:00 a.m., in violation of the Fourth Amendment. Plaintiff(s) asserts the first violation occurred when Defendant - Christopher Beyer illegally seized Plaintiff-1-

's key remote to his legally secured vehicle without his consent or a search warrant. Without the required search warrant, Defendant - Christopher Beyer's second violation occurred when Defendant - Christopher Beyer accompany by Defendants Michael Trader and K-9 Argo illegally entered Plaintiff-1's secured vehicle, in which there was a reasonable issue of privacy of his secured vehicle without a search warrant. Plaintiff(s) assert that it does not matter where the evidence was located, in the interior of the vehicle or the trunk of the vehicle, because the evidence was the fruit of a poisonous tree and inadmissible in any proceedings as such under the Fruit of The Poisonous Tree Doctrine, because it was obtained illegally in violation of Plaintiff-1's rights, privileges or immunities secured by the United States Constitution and Laws. Defendant - Christopher Beyer was aware of the fact that Plaintiff-1 had only access to areas inside the interior of the vehicle, and clearly the trunk was not accessible to Plaintiff-1 while secured in the back seat of Defendant - Christopher Beyer's cruiser. For some reason unknown to Plaintiff-1, Defendant - Christopher Beyer kept turning his body mic off and on between 08:39:17 to 08:54:00 a.m.. Defendant - Christopher Beyer after illegally locating the drugs, reapproached Plaintiff-1 once again while still illegally detained in the back of his cruiser, removes Plaintiff-1 from the back of his cruiser, places handcuffs on him, and began searching him again, this time more thoroughly than the first time, while asking him if he would be willing to cooperate? Plaintiff-1 immediately invokes his Fifth Amendment right to remain silent and right to counsel! At 08:55:47 a.m., Defendant - Christopher Beyer realized his body mic was still turned off, turns his mic back on, then asked Plaintiff-1 if he would be willing to cooperate again? Even though Plaintiff-1 had already invoked his right to remain silent and to counsel, so he reinvoked them. At 08:56:00 a.m., Plaintiff-1 once again stated to Defendant - Christopher Beyer "he had nothing to say!" At 08:59:55 a.m., Defendant - Christopher Beyer completed his thorough search of Plaintiff-1's person. At 09:00:45 a.m., Plaintiff-1 was secured, handcuffed, arrested, and replaced in the back of Defendant - Christopher Beyer's cruiser, yet Defendant - Christopher Beyer deliberately left Plaintiff-1's cell phones on the back seat with him, so Defendant - Christopher Beyer

could invade Plaintiff-1's privacy by easesdropping on any and all conversations of Plaintiff-1 at that point and time, through unknown recording or listening devices inside the cruiser under his control. At 09:00:52 a.m., Defendant - Christopher Beyer started celebrating, stating in reference to Plaintiff-1: "Got it, he went pass Plaintiff-1 and said, stop me, and Defendant - Christopher Beyer said ok". Clearly Defendant - Christopher Beyer in his own words during his celebration makes it very clear that the motive behind his pulling over Plaintiff-1 in this case was never about a traffick stop. It was Defendant - Christopher Beyer's personal belief [in his mind only, for Plaintiff-1 and Defendant - Christopher Beyer never had the above-stated conversation, Plaintiff-1 never told Defendant - Christopher Beyer to stop him], and racially motivated. Here, it was very clear in Defendant - Christopher Beyer's own words, but what is missing from Defendant - Christopher Beyer's celebration speech is, Plaintiff-1 is following this moble home a little to close I think I better pull him over and give him a ticket! Plaintiff(s) assert that if it had not been for Defendant - Christopher Beyer making the above statement they would never be able make a prima facie showing that pulling Plaintiff-1 over had nothing to do with a traffick violation, that was just a ruse put in place by Defendant - Christopher Beyer in an attempt to cover-up his racially motivated conduct, at times even turning his body mic off and on to conseal deliberate violations of Plaintiff-1's constitutional rights on June 14, 2011, and continuing to date "April 11, 2017". At 09:01:03 a.m., Defendant - Christopher Beyer turned his body mic back off, which from that point on, Defendant - Christopher Beyer's mic officially remained off the life of the stop. At 09:02:31 a.m., Defendant - Christopher Beyer is clearly and visibly easesdropping in on Plaintiff-1's cell phone conversations. At 09:32:39 a.m., Defendant - Christopher Beyer once again asked Plaintiff-1 where he got on the Turn Pike, even though he was fully aware that Plaintiff-1 had invoked his Fifth Amendment right to remain silent and to counsel. At 09:51:00 a.m., Defendant - Christopher Beyer deliberately turned off the audio & video recording devices prior to reaching the State Trooper's Barracks. Plaintiff(s) assert that as a

direct result of Defendant - Christopher Beyer's conduct on June 14, 2011 through March 1, 2017, and continuing to date "April 11, 2017", being in violation of Plaintiff-1's Fourth, Fifth, and Fourteenth Amendments, and Defendant - Christopher Beyer's racial profiling violated clearly established constitutional rights, privileges or immunities secured under provisions and protections guaranteed by the United States Constitution and Laws. Defendant - Christopher Beyer conspired to cover up his unreasonable infringements and encroachments of Plaintiff-1's Fourth, Fifth, Eighth, and Fourteenth Amendments rights by falsifying his June 14, 2011 Report. See Exhibit B. "This is where Defendant - Christopher Beyer concoct his ruse of events in his report knowing them to be pure fabrication in order to manipulate the information in the report to include events which he personally knew did not occur on June 14, 2011, between 08:39:17 a.m. through 08:51:00 a.m., to-wit: 'He handed me his New York (residence in Buffalo, NY) license. I asked who owned the car and he stated, "My Cousin". I asked where he was coming from. He stated his mom's house near the Detroit area in Beloit, MI. He stated he was visiting his mom as she is sick. He handed me a rental agreement for the vehicle (Renter's name was Latriece Thomas).'" Defendant - Christopher Beyer was so concern about covering up his constitutional violations of Plaintiff-1's Fourth, Fifth, Eighth, and Fourteenth Amendments rights, privileges or immunities secured by the United States Constitution and Laws on June 14, 2011 through March 1, 2017, and continuing to date "April 11, 2017", also any and all foreseeable and unforeseeable future injuries as a result of this Defendant's actions. Defendant - Christopher Beyer committing his acts under the color of law, may have been able to get away with violating Plaintiff-1's constitutional rights had it not been for Plaintiff-1's star-key-witness [Defendant - Christopher Beyer's cruiser audio & video of June 14, 2011]. See Exhibit A [which clearly shows contradictions Defendant - Christopher Beyer's June 14, 2011 Report between 08:39:17 through 08:48:46 a.m., shows not only that he never had Plaintiff-1's drivers license or rental agreement, nor did he attempt to read the rental agreement while standing at the window of Plaintiff-1's vehicle, nor did he possess Plaintiff-1's drivers license while walking back to his cruiser]; Also see Exhibit B [Defendant - Christopher Beyer's Report]. On June 4, 20-

12, Defendant - Christopher Beyer in furtherance of his conspiracy to cover up his infringements and encroachments of Plaintiff-1's constitutional rights, privileges or immunities secured by the United States Constitution and Laws gave knowingly perjured testimony contradicting the clear and convincing prima facie evidence shown by the Plaintiff(s)' star-key-witness [Defendant - Christopher Beyer's cruiser audio & video of June 14, 2011, between 08:39:17 through 08:54:00 a.m.]. Which reveal that Defendant - Christopher Beyer never received or obtained Plaintiff-1's drivers license or rental agreement, nor was there any evidence showing Defendant - Christopher Beyer standing outside of Plaintiff-1's rental vehicle reading the rental agreement prior to returning to his cruiser to run a LEADS check on Plaintiff-1's drivers license while reading over the rental agreement as he testified to at the June 4, 2012, Suppression Hearing. See Exhibit J [June 4, 2012, Suppression Hearing Transcripts (S.H.Tr.), Page 6, Lines 19-20; S.H.Tr., Page 7, Lines 3-25; S.H.Tr., Page 8, Lines 1-22; S.H.Tr., Page 9, Lines 10-11; and S.H.Tr., Page 10, Lines 6-16]. On February 11, 2014, Defendant - Christopher Beyer in furtherance of his conspiracy to cover up his infringements and encroachment of Plaintiff-1's constitutional rights, privileges or immunities secured by the United States Constitution and Laws gave knowingly perjured testimony contradicting the clear and convincing prima facie evidence shown by the Plaintiff(s)' star-key-witness that Defendant - Christopher Beyer never received or obtained Plaintiff-1's drivers license or rental, nor was there any evidence showing Defendant - Beyer standing outside of Plaintiff-1's rental vehicle reading the rental agreement prior to returning to his cruiser to run a LEADS check on Plaintiff-1's drivers license while reading over the rental agreement as he testified to at the February 11, 2014, Jury Trial. See Exhibit A; Exhibit B; also see Exhibit J. Because Plaintiff(s) have been denied a copy of the February 11, 2014, Jury Trial Transcripts, so Plaintiff(s) at this time cannot pin-point the exact location on the record where Defendant - Christopher Beyer committed his perjured testimony during the jury trial, but after the filing of discovery and interrogatories, Plaintiff(s) will give the location of the trial transcrip-

ts. Until then Plaintiff(s) are forced to rely on the record of the Court of Appeals through its June 22, 2015, Decision which was based primarily on Defendant - Christopher Beyer's falsified report of June 14, 2011; the perjured testimony given at the June 4, 2012, Suppression Hearing; and the perjured testimony given at the February 11, 2014, Jury Trial. See Exhibit A; Exhibit B; Exhibit J; and Exhibit AAS [Court of Appeals, Case No. 14CA010555, Decision filed June 22, 2015, Page 10, ¶¶21-22]; Also See Plaintiff-1's Application for Reopening of his Direct Appeal Under App.R. 26(B) Delayed and his Assignment of Errors I Through VI [with its Affidavit In Support of Request for Leave to File Appellant's Application for Reopening of his Direct Appeal Under App.R. 26(B) Delayed and his Assignment of Errors I Through VI - & - Exhibits A Through AAAE]. Plaintiff(s) wish to supplement his original claim number 2, to include the specific factual allegation as to this Defendant's implementing of his Sham Legal Process executed under the color of law with specific design to deprive Plaintiff(s) their rights, privileges or immunities secured by the United States Constitution and Laws because of their race. Because Plaintiff(s) have pleaded facts which, if proven, would entitle them to relief, dismissal is inappropriate. See Exhibits A through AAAE, of Plaintiff-1's Affidavit in Support of Request for Leave to File Appellant's Application for Reopening of Direct Appeal; Also see Exhibits 5a and 5b.

AMEND/SUPPLEMENT AS CLAIM NUMBER 3a:

¶33a. Plaintiff(s)' specific factual allegation as to actions of Defendant - Michael Trader a State Trooper employed by Defendant - Ohio State Highway Patrol, on June 14, 2011, 08:47:55 to 08:51:00 a.m., and in the performance of his official duties his conduct violated clearly established constitutional rights by racial profiling. Defendant - Michael Trader specific actions were performed under the color of law and racially motivated and designed to deprive Plaintiff(s) of constitutional rights, privileges or immunities secured under provisions of the Fourth, Fifth, Eighth, and Fourteenth Amendments to the United States Constitution and Laws. Plaintiff(s) assert that Defendant - Michael Trader's prom-

pt command given to Defendant - K-9 Argo to alert on Plaintiff-1's rental vehicle on June 14, 2011, at 08:48:05 a.m., by tapping two to four times on Plaintiff-1's vehicle were racially motivated, and in acting on such bias, performed an illegal search and seizure of a secured vehicle of Plaintiff-1 without first obtaining a search warrant. Defendant - Michael Trader being fully aware of Defendant - K-9 Argo's being prompt dependent, and the facts relating to a similar case of State of Ohio v. Antwonne Duke, Defendant - Michael Trader and Defendant - K-9 Argo were found not a credible means of detecting the order of cocaine. See Exhibit J [Suppression Hearing Transcript, Page 43, Lines 3-13]. Plaintiff-1 secured his vehicle as he exited it at 08:46:10 a.m., Defendant - Michael Trader and Defendant - K-9 Argo arrived at 08:47:55 a.m., and B-Lines straight for Plaintiff-1's vehicle to perform an air sniff. Plaintiff(s) assert that Defendant - Michael Trader engaged in overt actions in furtherance of implementing a written or unwritten policies of the Defendant - Ohio State Highway Patrol in place to discriminate against citizens in Ohio because of their race on June 14, 2011-June 4, 2012-February 11, 2014-June 22, 2015-February 2, 2017-February 24, 2017-March 1, 2017, and continuing to date "April 11, 2017", also foreseeable and unforeseeable future injuries by this Defendant [Michael Trader]. Plaintiff(s) seek to hold Defendant - Michael Trader liable based on his conduct violating clearly established constitutional rights of which a reasonable person would have known. *Christophel v. Kukulinsky*, 61 F.3d 479, 484 (6th Cir. 1995). What is extremely important to point out concerning this Defendant's conduct is: A.) Defendant - K-9 Argo was extremely high strung the entire time before, during and after the search, extremely paying immediate attention to Defendant - Michael Trader's right hand, which air sniff started at the trunk moving counterclockwise; B.) Defendant - K-9 Argo at no point starting from the trunk of Plaintiff-1's vehicle paid no attention to the lower or mid portion of the vehicle; and C.) Defendant - Michael Trader clearly keeps his right hand above waist level. Clearly Defendant - K-9 Argo began his air sniff search at the trunk area of Plaintiff-1's vehicle and did not alert until and only after being command to do so by Defenda-

nt - Michael Trader's tapping Plaintiff-1's vehicle two to four times as shown by Plaintiff(s)' star-key-witness [Exhibit A, audio & video of Defendant - Christopher Beyer's cruiser recording of June 14, 2011, at 08:48:05 a.m.]. This action of Defendant - Michael Trader was extremely illegal and very important to remember regarding this Defendant's conduct, is the fact that prior to his giving Defendant - K-9 Argo the prompt commands (the tapping of two to four times on Plaintiff-1's vehicle), Defendant - K-9 Argo did not alert on the vehicle! Plaintiff(s) asserts that this is not the first time that the subject concerning Defendant - Michael Trader and his prompting of Defendant - K-9 Argo being brought into question and this form of racial profiling. Plaintiff(s) are just the only ones who wishes to bring it to the Citizens of Ohio's attention. Defendant - Michael Trader "Training Record Support Plaintiff(s) claim number 3a and ¶33a that Defendant - K-9 Argo is Highly Prompt Dependent". Plaintiff(s) asserts that Defendant - Michael Trader's training record support that Defendant - K-9 Argo is highly Prompt Dependent and combined with the above herein claim, have pleaded facts which, if proven, would entitle them to relief, dismissal is inappropriate. See Exhibit AAI. Plaintiff(s) assert that the Report of Steven D. Nicely in the case of Ohio v. Issac Anderson and Ira Lee, Case No. 12CRO-84573, Provided on Sept. 20, 2013; Also see Exhibit AAI, Pages 3-20. Pages 5 through 10, Figures 1 through 5, are pictures of a Video Analysis performed in 2012, which is actually Defendants - Michael Trader and Defendant - K-9 Argo doing the identical search on the same type of vehicle as Plaintiff-1 was driving, the same traffick stop location, identical prompt commands, the identical area on the vehicle was also tapped, and both vehicles were similar in color. At 08:50:30 a.m., Defendant - Michael Trader lingered around Plaintiff-1's vehicle without touching it, until Defendant - Christopher Beyer walked over and illegally unlocked Plaintiff-1's vehicle with the illegally taken Key Remote of Plaintiff-1's without a search warrant or Plaintiff-1's consent. Then Defendant - Michael Trader opened Plaintiff-1's passenger door, and although, superficial nor thorough desire to search the vehicle's interior. See Exhibit A and Exhibit AAI. On June 4, 2012, at the Suppression Hearing Defendant - Michael Trader knowingly gave perjured testimony, by

his testimony given at Page 37, Lines 6 through 13. When giving this testimony, Defendant - Michael Trader deliberately failed to disclose the prompt command he gave to Defendant - K-9 Argo to alert on Plaintiff-1's vehicle, as a direct result of Defendant - Michael Trader's tapping two to four times on Plaintiff-1's vehicle prior to Defendant - K-9 Argo's alerting by scratching Plaintiff-1's vehicle at the same area that Defendant - Michael Trader tapped two to four times in the Ohio v. Anderson, case. Defendant - Michael Trader has no defense to the claims as stated in Claim Number 3, ¶133; Amend/Supplement As Claim Number 3a, ¶133a incorporated herein and made a part of this new filing as if rewritten, when Defendant - Michael Trader confessed to being a co-conspirator in what was Defendant - Christopher Beyer's racially motivated racial profiling occurring on June 14, 2011, 08:39:17 through 08:51:00 a.m., when these Defendants illegally obtained Plaintiff-1's Key Remote without a warrant, and illegally unlocking Plaintiff-1's secured vehicle violating not only Plaintiff-1's constitutional right to privacy, and unreasonable searches and seizures and rights, privileges or immunities secured under provisions of the United States Constitution and Laws because of their race. See Exhibit A and Exhibit J [S.H.Tr. Page 39, Lines 9-11]. On February 11, 2014, Defendant - Michael Trader during trial on direct examination again misrepresented the record regarding illegally inducing probable cause via Defendant - K-9 Argo. Near the close of cross-examination, Defendant - Mark A. Aufdenkampe directly asked why did Defendant - Michael Trader tap the vehicle where Defendant - K-9 Argo allegedly indicated? Defendant - Michael Trader responded by admitting to tapping the vehicle allegedly to get Defendant - K-9 Argo's attention. But in his closing trial testimony Defendant - Michael Trader made it quite clear his racial motivation, by admitting that Defendant - Christopher Beyer was out there doing Defendant - Michael Trader's thing (racial profiling). Defendant - Michael Trader was so concerned about covering up his constitutional violations of Plaintiff-1's Fourth, Fifth, Eighth, and Fourteenth Amendments rights, privileges or immunities secured by the United States Constitution and Laws on June 14, 2011 through March 1, 2017, and continuing to date "Ap-

ril 11, 2017", also any and all foreseeable and unforeseeable future injuries as a result of this Defendant's actions. Defendant - Michael Trader committing his acts under the color of law, may have been able to get away with violating Plaintiff-1's constitutional rights had it not been for Plaintiff(s)' star-key-witness [Exhibit A, audio & video of Defendant - Christopher Beyer's cruiser recording of June 14, 2011, at 08:48:05 a.m.]. See Exhibit A [Which clearly shows Defendant - Michael Trader prompt commands being given to Defendant - K-9 Argo to alert on Plaintiff-1's vehicle]. Because Plaintiff(s) have been denied a copy of the February 11, 2014, Jury Trial Transcripts, so Plaintiff(s) at this time cannot pin-point the exact location on the record where Defendant - Michael Trader committed his perjured testimony during the jury trial, but after the filing of discovery and interrogatories, Plaintiff(s) will give the location of the trial transcripts. Until then Plaintiff(s) are forced to rely on the record of the Court of Appeals through its June 22, 2015, Decision which was based primarily on Defendant - Christopher Beyer's falsified report of June 14, 2011; the perjured testimony given at the June 4, 2012, Suppression Hearing; and the perjured testimony given at the February 11, 2014, Jury Trial. See Exhibit A; Exhibit B; Exhibit J; and Exhibit AAS; Also see Exhibits A through AAAE. Plaintiff(s) wish to supplement their original claim number 3, to include the specific factual allegation as to this Defendant's implementing of his Sham Legal Process executed under the color of law with specific design to deprive Plaintiff(s) of their rights, privileges or immunities secured by the United States Constitution and Laws because of their race. Because Plaintiff(s) have pleaded facts which, if proven, would entitle them to relief, dismissal is inappropriate. See Exhibits A through AAAE, of Plaintiff-1's Affidavit in Support of Request for Leave to File Appellant's Application for Reopening of Direct Appeal; Also see Exhibits 5a and 5b.

AMEND/SUPPLEMENT AS CLAIM NUMBER 4a:

¶34a. Plaintiff(s)' specific factual allegation as to actions of Defendant - K-9 Argo a State Trooper Canine employed by the Ohio State Highway Patrol, on June 14, 2011, 08:47:

55 to 08:48:05 a.m., and in the performance of his official duties his conduct violated clearly established constitutional rights, privileges or immunities secured under provisions and protection of the Fourth, Fifth, Eighth, and Fourteenth Amendments of the United States Constitution and Laws. **Ohio v. Anderson, Case No. 12CR084573 (Video recording for 02/08/2012, 12:57:33, L-SP, 135@D10)**. Plaintiff(s) assert that the purpose of Claim Numbers 3, ¶133; Amend/Supplement As Claim Number 3a, ¶133a; Claim Number 4, ¶134; Amend/Supplement As Claim Number 4a, ¶134a is to address the issue of **Racial Profiling** being implemented unconstitutionally on Ohio's Highways and Turn Pike by discriminatory means by racially motivated State Troopers employed by the State of Ohio, who is responsible for making a legal decision if proven to be liable if Defendant - K-9 Argo's response in this incident as a drug detector dog was sufficient to produce probable cause when it is evident that Defendant - K-9 Argo is prompt dependent. Plaintiff(s) assert that their claim against Defendant - K-9 Argo and his partner handler Defendant - Michael Trader are based upon Defendant - Michael Trader's racial profiling discriminating against african americans and other non-white citizens of these United States while traveling through the State of Ohio. Plaintiff(s) are supporting their claims against Defendant - K-9 Argo and Defendant Michael Trader based on an incident report relating to the **Anderson** case, identical to **State v. Jackson, Case No. 11CR083104**. Plaintiff-1 secured his vehicle at 08:46:10 a.m., Defendant - K-9 Argo arrived at 08:47:55 a.m., with his handler and partner Defendant - Michael Trader and B-Lines straight to Plaintiff-1's vehicle. What is extremely important to point out is this Defendant - K-9 Argo's history of being prompt dependent, and the facts relating to a similar case of **State of Ohio v. Antwonne Duke**, Defendant - K-9 Argo and Defendant - Michael Trader were found not a credible means of detecting the odor of cocaine. See Exhibit J [**Suppression Hearing Transcript, Page 43, Lines 3-13**]. Plaintiff-1 secured his vehicle at 08:46:10 a.m., Defendant - K-9 Argo arrived at 08:47:55 a.m., with his handler and partner Defendant - Michael Trader and B-Lines straight to Plaintiff-1's vehicle to perform an air sniff. Plaintiff(s) assert that Defendant - K-9 Argo

received prompt commands from Defendant - Michael Trader to alert on Plaintiff-1's rental vehicle on June 14, 2011, at 08:48:05 a.m., by tapping two to four times on Plaintiff-1's vehicle were racially motivated, and in acting on such bias, performed an illegal search and seizure of a secured vehicle of Plaintiff-1 without first obtaining a search warrant. What is extremely important to point out is: A.) Defendant - K-9 Argo was extremely high strung the entire time before, during and after the search, extremely paying immediate attention to Defendant - Michael Trader's right hand, when air sniff started at the trunk moving counterclockwise; B.) Defendant - K-9 Argo at no point from the trunk of Plaintiff-1's vehicle paid no attention to the lower or mid portion of the vehicle; and C.) Defendant - Michael Trader clearly keeps his right hand above waist level. Clearly Defendant - K-9 Argo began his air sniff at the trunk area of Plaintiff-1's vehicle and did not alert. After it was clear to Defendant - Michael Trader that Defendant - K-9 Argo was not going to alert on his own [because the air sniff was almost completed], Defendant - Michael Trader taps Plaintiff-1's vehicle two to four times as shown by Plaintiff(s)' starkey-witness [Exhibit A, audio & video of Defendant - Christopher Beyer's cruiser recording of June 14, 2011, at 08:48:05 a.m., which also clearly shows Defendant - Michael Trader's prompt commands being given to Defendant - K-9 Argo to alert on Plaintiff-1's vehicle]. Defendant - Michael Trader's tapping was the prompt command which cued Defendant - K-9 Argo to alert on Plaintiff-1's vehicle. Defendant - K-9 Argo and Defendant - Michael Trader training records as a drug detector dog team fully supports the Plaintiff(s) Claim Numbers 3, ¶33; Amend/Supplement As Claim Number 3a, ¶33a; Claim Number 4, ¶34; Amend/Supplement As Claim 4a, ¶34a that Defendant - K-9 Argo is prompt dependant brought about by his poor training by Defendant - Michael Trader. In order for this Honorable Court to understand the magnitude of this form of racial profiling, this Honorable Court must consider both cases Ohio v. Anderson, Case No. 12CR084573's video of 02/08/2012, 12:57:33 p.m.; and State v. Jackson, Case No. 11CR083104's video of 06/14/2011, 08:48:05 a.m.. Defendant - K-9 Argo's claimed trained response (scratching) was most likely caused by Defendant - M-

Michael Trader's actions and not that contraband drug odor. At 08:47:55 when Defendant - K-9 Argo and Defendant - Michael Trader first approached Plaintiff-1's vehicle you can see the dog sniffing the trunk area and its foot being raised. At that point if Defendant - K-9 Argo was truly onto the odor and was not prompt dependent (need of Defendant - Michael Trader's cues), Defendant - K-9 Argo would have remained focused and would not have departed as easily as he did Defendant - Michael Trader's passed by. Defendant - Michael Trader passed Defendant - K-9 Argo and Defendant - K-9 Argo turned and went with Defendant - Michael Trader. If Defendant - K-9 Argo's exhibition of the orienting response was caused by drug odor Defendant - K-9 Argo should not have departed as he did. What should have occurred is that Defendant - K-9 Argo should have struggled leaving the odor. Basically Defendant - Michael Trader should have been jerked back to Defendant - K-9 Argo because Defendant - K-9 Argo would not leave. This did not happen. See Exhibit A. Which also demonstrates Defendant - K-9 Argo was not operating under free operant. At 08:48:05 a.m., Defendant - Michael Trader realizing that they were about to complete the air sniff without alerting on Plaintiff-1's vehicle, changed his body posture and tapped two to four times on Plaintiff-1's vehicle giving Defendant - K-9 Argo prompt command to alert. Plaintiff(s) ~~star-key-witness~~ [Exhibit A] clearly shows Defendant - K-9 Argo scratching at the driver's side rear door area. This further demonstrates that Defendant - K-9 Argo in this incident was not scratching based on the detection of contraband drug odor, but because of Defendant - Michael Trader's prompt command. Plaintiff(s) wish to supplement their original claim number 4, to include the specific factual allegations as to this Defendant's prompt dependency executed under the color of law with specific design to deprive Plaintiff(s) of their rights, privileges or immunities secured by the United States Constitution and Laws because of their race. Because Plaintiff(s) have pleaded facts which, if proven, would entitle them to relief, dismissal is inappropriate. See Exhibits A through AAEE, of Plaintiff-1's Affidavit in Support of Request for Leave to File Appellant's Application for Reopening of Direct Appeal; Also see Exhibits 5a and 5b.

AMEND/SUPPLEMENT AS CLAIM NUMBER 5a:

¶135. Plaintiff's specific factual allegation as to actions of Defendant - Geno Taliano a Special Agent employed by the Drug Enforcement Administration (DEA), on June 14, 2011, 08:54:00 through 11:55:00 a.m., and in the performance of his official duties his conduct violated clearly established constitutional rights by conspiring in racial profiling. Defendant - Geno Taliano specific actions were performed under the color of law and racially motivated and designed to deprive Plaintiff(s) of constitutional rights, privileges or immunities secured under provisions of the Fourth, Fifth, Eighth, and Fourteenth Amendments to the United States Constitution and Laws. Plaintiff(s) assert that questioning Plaintiff-1 after he had invoked his rights to remain silent and to counsel, was the direct result of enforcement of a written or unwritten policy of conspiring to deprive Plaintiff-1 being implemented unconstitutionally against United States Citizens traveling on Ohio's Highways and Turn Pike, who happen to be minorities. Plaintiff(s) assert that Defendant - Geno Taliano engaged in overt actions in furtherance of implementing a written or unwritten policies of the Drug Enforcement Administration (DEA) in place to discriminate against citizens in Ohio because of their race on June 14, 2011-June 15, 2011-June 16, 2011-June 17, 2011-June 4, 2012-February 11, 2014-June 22, 2015-February 2, 2017-February 24, 2017, and continuing to date "April 11, 2017", also foreseeable and unforeseeable future injuries by this Defendant [Geno Taliano]. Plaintiff(s) seek to hold Defendant - Geno Taliano liable based on his conduct violating clearly established constitutional rights of which a reasonable person would have known. Plaintiff(s) wish to supplement their original claim number 5, to include the specific factual allegation as to this Defendant's conspiring in a Sham Legal Process executed under the color of law with specific design to deprive Plaintiff(s) of their rights, privileges or immunities secure by the United States Constitution and Laws because of their race. Because Plaintiff(s) have pleaded facts which, if proven, would entitle them to relief, dismissal is inappropriate.

See Exhibits A through AAAE, of Plaintiff-1's Affidavit in Support of Request for Leave

to File Appellant's Application for Reopening of Direct Appeal; Also see Exhibit 6a.

AMEND/SUPPLEMENT AS CLAIM NUMBER 6a:

¶36a. Plaintiff(s)' specific factual allegation as to actions of Defendant - Caitlin Szczepinski a Special Agent employed by the Drug Enforcement Administration (DEA), on June 14, 2011, 08:54:00 through 11:55:00 a.m., and in the performance of her official duties her conduct violated clearly established constitutional rights by conspiring in racial profiling. Defendant - Caitlin Szczepinski specific actions were performed under the color of law and racially motivated designed to deprive Plaintiff(s) of constitutional rights, privileges or immunities secured under provisions of the Fourth, Fifth, Eighth, and Fourteenth Amendments to the United States Constitution and Laws. Plaintiff(s) assert that questioning Plaintiff-1 after he had invoked his rights to remain silent and to counsel, was the direct result of enforcement of a written or unwritten policy of conspiring to deprive Plaintiff-1 being implemented unconstitutionally against United States Citizens traveling on Ohio's Highways and Turn Pike, who happen to be minorities. Plaintiff(s) assert that Defendant - Caitlin Szczepinski engaged in overt actions in furtherance of implementing a written or unwritten policies of the Drug Enforcement Administration (DEA) in place to discriminate against citizens in Ohio because of their race on June 14, 2011-June 15, 2011-June 16, 2011-June 17, 2011-June 4, 2012-February 11, 2014-June 22, 2015-February 2, 2017-February 24, 2017, and continuing to date "April 11, 2017", also foreseeable and unforeseeable future injuries by this Defendant [Caitlin Szczepinski]. Plaintiff(s) seek to hold Defendant - Caitlin Szczepinski liable based on her conduct violating clearly established constitutional rights of which a reasonable person would have known. Plaintiff(s) wish to supplement their original claim number 6, to include the specific factual allegation as to this Defendant's conspiring in a **Sham Legal Process** executed under the color of law with specific design to deprive Plaintiff(s) of their rights, privileges or immunities secured by the United States Constitution and Laws because of their race. Because Plaintiff(s) have pleaded facts which, if proven, would entitle them to

relief, dismissal is inappropriate. See Exhibits A through AAAE, of Plaintiff-1's Affidavit in Support of Request for Leave to File Appellant's Application for Reopening of Direct Appeal; Also see Exhibit 6a.

AMEND/SUPPLEMENT AS CLAIM NUMBER 7a:

¶37a. Plaintiff(s)' specific factual allegation as to actions or non-actions of Defendant - Dennis P. Will is the Lorain County Prosecutor, by his actions or non-actions in failing to protect Plaintiff(s) from acts of discrimination of Racial Profiling committed on June 14, 2011, 08:39:17 to 08:51:00 a.m.. These specific actions were performed under the color of law by Assistant Lorain County Prosecutors who infringements and encroachments were racially motivated and a part of an ongoing **Sham Legal Process** designed to deprive Plaintiff(s) of constitutional rights, privileges or immunities secured under provisions of the Fourth, Fifth, Eighth, and Fourteenth Amendments to the United States Constitution and Laws by allowing his Assistant Prosecutors to engage in overt actions in furtherance of implementing policies of the Defendant - Ohio State Highway Patrol in place to discriminate against Citizens of Ohio and other States traveling on Ohio's Highways and Turn Pike because of their race on June 14, 2011-June 15, 2011-June 16, 2011-June 17, 2011-June 4, 2012-February 11, 2014-June 22, 2015-February 2, 2017-March 23, 2017, and continuing to date "April 11, 2017", also foreseeable and unforeseeable future injuries by this Defendant (Dennis P. Will). Plaintiff(s) seeks to hold Defendant - Dennis P. Will liable based on his role in supervisory his Assistant Prosecutors who allegedly committed constitutional violations when Defendant - Dennis P. Will implicitly authorized, approved or knowingly acquiesced in the unconstitutional conduct of Co-Conspirators Defendants - Ohio State Highway Patrol; Christopher Beyer; Michael Trader; K-9 Argo; Mary Slanczka; Jennifer Riedthaler; Peter Gauthier; Laura Ann Dezort; Jack W. Bradley; Mark A. Aufdenkampe; Paul A. Griffin; Paul A. Mancino, Jr; Edward Zaleski; and John R. Miraldi (subordinate)." Plaintiff(s) wish to supplement their original claim number 7, to include the specific factual allegation as to this Defendant's being a knowing or unknowing

co-conspirator in the implementing of his Sham Legal Process executed under the color of law with specific design to deprive Plaintiff(s) of their rights, privileges or immunities secured by the United States Constitution and Laws because of their race. Because Plaintiff(s) have pleaded facts which, if proven, would entitle them to relief, dismissal is inappropriate. See Exhibits A through AAAE, of Plaintiff-1's Affidavit in Support of Request for Leave to File Appellant's Application for Reopening of Direct Appeal; Also see Exhibit 7a; and Also see Ohio Rules of Professional Conduct (Proof.Cond.R.) 1.1; 1.2(a)(c)(d)&(e); 1.3; 1.4(a)(1)(2)(3)(4)(5), (B)&(C); 2.1; 3.4(a)(b)(d)&(e); 3.8(a)(b)(c)&(d); 4.1(A)&(B); 5.1(C)(1)&(2); 8.3(A)&(B); 8.4(a)(b)(c)(d)(e)(f)(g)&(h).

AMEND/SUPPLEMENT AS CLAIM NUMBER 8a:

¶38. Plaintiff(s)' specific factual allegation as to actions of Defendant - Mary Slanczka a Lorain County Assistant Prosecutor employed by the County of Lorain, by her actions or non-actions in failing to protect Plaintiff(s) from acts of discrimination of Racial Profiling committed on June 14, 2011, 08:39:17 to 08:51:00 a.m.. These specific actions were performed under the color of law in deliberate acts of infringements and encroachments were racially motivated and a part of an ongoing Sham Legal Process designed to deprive Plaintiff(s) of constitutional rights, privileges or immunities secured under provisions of the Fourth, Fifth, Eighth, and Fourteenth Amendment to the United States Constitution and Laws by her engaging in an overt act in furtherance of implementing policies of the Defendant - Ohio State Highway Patrol in place to discriminate against Citizens of Ohio and other States traveling on Ohio's Highways and Turn Pike because of their race on June 14, 2011-June 15, 2011-June 16, 2011-June 17, 2011-June 4, 2012-February 11, 2014-June 22, 2015-February 2, 2017-March 23, 2017, and continuing to date "April 11, 2017", also foreseeable and unforeseeable future injuries by this Defendant (Mary Slanczka). Plaintiff(s) seeks to hold Defendant - Mary Slanczka liable based on her role as a knowing or unknowing co-conspirator. Plaintiff(s) wish to supplement their original claim number 8, to include the specific factual allegation as to this Defendant - Mary Slanczka. Bec-

ause Plaintiff(s) have pleaded facts which, if proven, would entitle them to relief, dismissal is inappropriate. See Exhibit A through AAAE, of Plaintiff-1's Affidavit in Support of Request for Leave to File Appellant's Application for Reopening of Direct Appeal; Also see Exhibit 7a; and Also see Ohio Rules of Professional Conduct (Prof.Cond.R.) 1.1; 1.2(a)(c)(d)&(e); 1.3; 1.4(a)(1)(2)(3)(4)(5), (B)&(C); 2.1; 3.4(a)(b)(d)&(e); 3.8(a)(b)(c)&(d); 4.1(A)&(B); 5.1(C)(1)&(2); 8.3(A)&(B); 8.4(a)(b)(c)(d)(e)(f)(g)&(h).

AMEND/SUPPLEMENT AS CLAIM NUMBER 9a:

¶39. Plaintiff(s)' specific factual allegation as to actions of Defendant - Jennifer M. Riedthaler a Lorain County Assistant Prosecutor employed by the County of Lorain, by her actions or non-actions in failing to protect Plaintiff(s) from acts of discrimination of Racial Profiling committed on June 14, 2011, 08:39:17 to 08:51:00 a.m.. These specific actions were performed under the color of law in . deliberate acts of infringements and encroachments were racially motivated and a part of an ongoing Sham Legal Process designed to deprive Plaintiff(s) of constitutional rights, privileges or immunities secured under provisions of the Fourth, Fifth, Eighth, and Fourteenth Amendments to the United States Constitution and Laws by her engaging in an overt act in furtherance of implementing policies of the Defendant - Ohio State Highway Patrol in place to discriminate against Citizens of Ohio and other States traveling on Ohio's Highway and Turn Pike because of their race on June 14, 2011-June 15, 2011-June 16, 2011-June 17, 2011-June 4, 2012-February 11, 2014-June 22, 2015-February 2, 2017-March 23, 2017, and continuing to date "April 11, 2017", also foreseeable and unforeseeable future injuries by this Defendant (Jennifer M. Riedthaler). Plaintiff(s) seeks to hold Defendant - Jennifer M. Riedthaler liable based on her role as a knowing or unknowing co-conspirator. Plaintiff(s) wish to supplement their original claim number 9, to include the specific factual allegation as to this Defendant - Jennifer M. Riedthaler. Because Plaintiff(s) have pleaded facts which, if proven, would entitle them to relief, dismissal is inappropriate. See Exhibit A through AAAE, of Plaintiff-1's Affidavit in Support of Request for Leave to File Appellant's Application

for Reopening of Direct Appeal; Also see Exhibit 7a; and Also see Ohio Rules of Professional Conduct (Prof.Cond.R.) 1.1; 1.2(a)(c)(d)&(e); 1.3; 1.4(a)(1)(2)(3)(4)(5), (B)&(C); 2.1; 3.4(a)(b)(d)&(e); 3.8(a)(b)(c)&(d); 4.1(A)&(B); 5.1(C)(1)&(2); 8.3(A)&(B); 8.4(a)(b)(c)(d)(e)(f)(g)&(h).

AMEND/SUPPLEMENT AS CLAIM NUMBER 10a:

¶40a. Plaintiff(s)' specific factual allegation as to actions of Defendant - Peter J. Gauthier a Lorain County Assistant Prosecutor employed by the County of Lorain, by his actions or non-actions in failing to protect Plaintiff(s) from acts of discrimination of Racial Profiling committed on June 14, 2011, 08:39:17 to 08:51:00 a.m.. These specific actions were performed under the color of law in deliberate acts of infringements and encroachments were racially motivated and a part of an ongoing **Sham Legal Process** designed to deprive Plaintiff(s) of constitutional rights, privileges or immunities secured under provisions of the Fourth, Fifth, Eighth, and Fourteenth Amendments to the United States Constitution and Laws by his engaging in an overt act in furtherance of implementing policies of the Defendant - Ohio State Highway Patrol in place to discriminate against Citizens of Ohio and other States traveling on Ohio's Highways and Turn Pike because of their race on June 14, 2011-June 15, 2011-June 16, 2011-June 17, 2011-June 4, 2012-February 11, 2014-June 22, 2015-February 2, 2017-March 23, 2017, and continuing to date "April 11, 2017", also foreseeable and unforeseeable future injuries by this Defendant (Peter J. Gauthier). Plaintiff(s) seeks to hold Defendant - Peter J. Gauthier liable based on his role as a knowing or unknowing co-conspirator. Plaintiff(s) wish to supplement their original claim number 10, to include the specific factual allegation as to this Defendant - Peter J. Gauthier. Because Plaintiff(s) have pleaded facts which, if proven, would entitle them to relief, dismissal is inappropriate. See Exhibit A through AAAE, of Plaintiff-1's Affidavit in Support of Request for Leave to File Appellant's Application for Reopening of Direct Appeal; Also se Exhibit 7a; and Also see Ohio Rules of Professional Conduct (Prof.Cond.R.) 1.1; 1.2(a)(c)(d)&(e); 1.3; 1.4(a)(1)(2)(3)(4)(5), (B)&(C); 2.1; 3.4

(a)(b)(d)&(e); 3.8(a)(b)(c)&(d); 4.1(A)&(B); 5.1(C)(1)&(2); 8.3(A)&(B); 8.4(a)(b)(c)(d)
(e)(f)(g)&(h).

AMEND/SUPPLEMENT AS CLAIM NUMBER 11a:

¶41a. Plaintiff(s)' specific factual allegation as to actions of Defendant - Laura Ann Dezort a Lorain County Assistant Prosecutor employed by the County of Lorain, by her actions or non-actions in failing to protect Plaintiff(s) from acts of discrimination of Racial Profiling committed on June 14, 2011, 08:39:17 to 08:51:00 a.m.. These specific actions were performed under the color of law in deliberate acts of infringement and encroachments were racially motivated and a part of an ongoing Sham Legal Process designed to deprive Plaintiff(s) of constitutional rights, privileges or immunities secured under provisions of the Fourth, Fifth, Eighth, and Fourteenth Amendments to the United States Constitution and Laws by her engaging in an overt act in furtherance of implementing policies of the Defendant - Ohio State Highway Patrol in place to discriminate against Citizens of Ohio and other States traveling on Ohio's Highways and Turn Pike because of their race on June 14, 2011-June 15, 2011-June 16, 2011-June 17, 2011-June 4, 2012-February 11, 2014-June 22, 2015-February 2, 2017-March 23, 2017, and continuing to date "April 11, 2017", also foreseeable and unforeseeable future injuries by this Defendant (Laura Ann Dezort). Plaintiff(s) seeks to hold Defendant - Laura Ann Dezort liable based on her role as a knowing or unknowing co-conspirator. Plaintiff(s) wish to supplement their original claim number 11, to include the specific factual allegation as to this Defendant - Laura Ann Dezort. Because Plaintiff(s) have pleaded facts which, if proven, would entitle them to relief, dismissal is inappropriate. See Exhibit A through AAAE, of Plaintiff-1's Affidavit in Support of Request for Leave to File Appellant's Application for Reopening of Direct Appeal; Also see Exhibit 7a; and Also see Ohio Rules of Professional Conduct (Prof.Cond.R.) 1.1; 1.2(a)(c)(d)&(e); 1.3; 1.4(a)(1)(2)(3)(4)(5), (B)&(C); 2.1; 3.4(a)(b)(d)&(e); 3.8(a)(b)(c)&(d); 4.1(A)&(B); 5.1(C)(1)&(2); 8.3(A)&(B); 8.4(a)(b)(c)(d)(e)(f)(g)&(h).

AMEND/SUPPLEMENT AS CLAIM NUMBER 12a:

¶42a. Plaintiff(s)' specific factual allegation as to actions of Defendant - Jack W. Bradley an attorney of law in the private practice of law in the State of Ohio, County of Lorain, by his actions or non-actions in failing to protect Plaintiff(s) from acts of discrimination of Racial Profiling committed on June 14, 2011, 08:39:17 to 08:51:00 a.m.. These specific actions were performed under the color of law in deliberate acts of infringements and encroachments were racially motivated and a part of an ongoing **Sham Legal Process** designed to deprive Plaintiff(s) of constitutional rights, privileges or immunities secured under provisions of the Fourth, Fifth, Sixth, and Fourteenth Amendments to the United States Constitution and Laws by his engaging in an overt act in furtherance of implementing policies of the Defendant - Ohio State Highway Patrol in place to discriminate against Citizens of Ohio and other States traveling on Ohio's Highways and Turn Pike because of their race on June 14, 2011-June 15, 2011-June 16, 2011-June 17, 2011-June 4, 2012-February 11, 2014-June 22, 2015-February 2, 2017-February 17, 2017-March 16, 2017, and continuing to date "April 11, 2017", also foreseeable and unforeseeable future injuries by this Defendant (Jack W. Bradley). Plaintiff(s) seeks to hold Defendant - Jack W. Bradley liable based on his role as a knowing or unknowing co-conspirator. Plaintiff(s) wish to supplement their original claim number 12, to include the specific factual allegation as to this Defendant - Jack W. Bradley. Because Plaintiff(s) have pleaded facts which, if proven, would entitle them to relief, dismissal is inappropriate. See Exhibits A through AAE, of Plaintiff-1's Affidavit in Support of Request for Leave to File Appellant's Application for Reopening of Direct Appeal; Also see Exhibits 3a and 3b; and Also see Ohio Rules of Professional Conduct (Prof.Cond.R.) 1.1; 1.2(a)(c)(d)&(e); 1.3; 1.4(a)(1)(2)(3)(4)(5), (B)&(C); 2.1; 3.4(a)(b)(d)&(e); 3.8(a)(b)(c)&(d); 4.1(A)&(B); 5.1(C)(1)&(2); 8.3(A)&(B); 8.4(a)(b)(c)(d)(e)(f)(g)&(h).

AMEND/SUPPLEMENT AS CLAIM NUMBER 13a:

¶43a. Plaintiff(s)' specific factual allegation as to actions of Defendant - Mark A.

Aufdenkampe an attorney of in the private practice of law in the State of Ohio, County of Lorain, by his actions or non-actions in failing to protect Plaintiff(s) from acts of discrimination of Racial Profiling committed on June 14, 2011, 08:39:17 to 08:51:00 a.m.. These specific actions were performed under the color of law in deliberate acts of infringements and encroachments were racially motivated and a part of an ongoing **Sham Legal Process** designed to deprive Plaintiff(s) of constitutional rights, privileges or immunities secured under provisions of the Fourth, Fifth, Sixth, and Fourteenth Amendments to the United States Constitution and Laws by his engaging in an overt act in furtherance of implementing policies of the Defendant - Ohio State Highway Patrol in place to discriminate against Citizens of Ohio and other States traveling on Ohio's Highways and Turn Pike because of their race on June 14, 2011-June 15, 2011-June 16, 2011-June 17, 2011-June 4, 2012-February 11, 2014-June 22, 2015-February 2, 2017-February 8, 2017, and continuing to date "April 11, 2017", also foreseeable and unforeseeable future injuries by this Defendant (Mark A. Aufdenkampe). Plaintiff(s) seeks to hold Defendant - Mark A. Aufdenkampe liable based on his role as a knowing or unknowing co-conspirator. Plaintiff(s) wish to supplement their original claim number 13, to include the specific factual allegation as to this Defendant - Mark A. Aufdenkampe. Because Plaintiff(s) have pleaded facts which, if proven, would entitle them to relief, dismissal is inappropriate. **See Exhibits A through AAAE, of Plaintiff-1's Affidavit in Support of Request for Leave to File Appellant's Application for Reopening of Direct Appeal; Also see Exhibit 1a; and Also see Ohio Rules of Professional Conduct (Prof.Cond.R.) 1.1; 1.2(a)(c)(d)&(e); 1.3; 1.4(a)(1)(2)(3)(4)(5), (B)&(C); 2.1; 3.1(a)(b)(d)&(e); 3.8(a)(b)(c)&(d); 4.1(A)&(B); 5.1(C)(1)&(2); 8.3(A)&(B); 8.4(a)(b)(c)(d)(e)(f)(g)&(h).**

AMEND/SUPPLEMENT AS CLAIM NUMBER 14a:

¶44a. Plaintiff(s)' specific factual allegation as to actions of Defendant - Paul A. Griffin an attorney of law in the private practice of law in the State of Ohio, County of Lorain, by his actions or non-actions in failing to protect Plaintiff(s) from acts of di-

discrimination of Racial Profiling committed on June 14, 2011, 08:39:17 to 08:51:00 a.m.. These specific actions were performed under the color of law in deliberate acts of infringements and encroachments were racially motivated and a part of an ongoing Sham Legal Process designed to deprive Plaintiff(s) of constitutional rights, privileges or immunities secured under provisions of the Fourth, Fifth, Sixth, and Fourteenth Amendments to the United States Constitution and Laws by his engaging in an overt act in furtherance of implementing policies of the Defendant - Ohio State Highway Patrol in place to discriminate against Citizens of Ohio and other States traveling on Ohio's Highways and Turn Pike because of their race on June 14, 2011-June 15, 2011-June 16, 2011-June 17, 2011-June 4, 2012-February 11, 2014-June 22, 2015-February 2, 2017-February 24, 2017-March 2, 2017, and continuing to date "April 11, 2017", also foreseeable and unforeseeable future injuries by this Defendant (Paul A. Griffin). Plaintiff(s) seeks to hold Defendant - Paul A. Griffin liable based on his role as a knowing or unknowing co-conspirator. Plaintiff(s) wish to supplement their original claim number 14, to include the specific factual allegation as to this Defendant - Paul A. Griffin. Because Plaintiff(s) have pleaded facts which, if proven, would entitle them to relief, dismissal is inappropriate. See Exhibits A through AAAE, of Plaintiff-1's Affidavit in Support of Request for Leave to File Appellant's Application for Reopening of Direct Appeal; Also see Exhibits 4a and 4b; and Also see Ohio Rules of Professional Conduct (Prof.Cond.R.) 1.1; 1.2(a)(c)(d)&(e); 1.3; 1.4(a)(1)(2)(3)(4)(5), (B)&(C); 2.1; 3.1(a)(b)(d)&(e); 3.8(a)(b)(c)&(d); 4.1(A)&(B); 5.1(C)(1)&(2); 8.3(A)&(B); 8.4(a)(b)(c)(d)(e)(f)(g)&(H).

AMEND/SUPPLEMENT AS CLAIM NUMBER 15a:

¶45a. Plaintiff(s)' specific factual allegation as to actions of Defendant - Paul A. Mancino, Jr. an attorney of law in the private practice of law in the State of Ohio, County of Cuyahoga, by his actions or non-actions in failing to protect Plaintiff(s) from acts of discrimination of Racial Profiling committed on June 14, 2011, 08:39:17 to 08:51:00 a.m.. These specific actions were performed under the color of law in deliberate acts of