

E2666 - E93

IN THE COURT OF COMMON PLEAS
FRANKLIN COUNTY, OHIO
CIVIL DIVISION

FILED
COMMON PLEAS COURT
#3
COPY
2017 JAN 20 AM 8:10

CLIFTON A. JACKSON #A652-163
Lake Erie Correctional Institution
501 Thompson Road / P.O. Box 8000
Conneaut, Ohio 44030

CLERK OF COURTS

-and-

ALEXANDER JEMISON

Buffalo, New York

-and-

AMBER POWLAK

Buffalo, New York

-and-

MASON JACKSON

Buffalo, New York

-and-

MONEH FULLER

Buffalo, New York

-and-

ROMAN MOTLEY

Buffalo, New York

-and-

ELIJAH FULLER

Buffalo, New York

-and-

LORRIANNA JACKSON

Buffalo, New York

-and-

CIVIL No. 17 CV 616

JUDGE:

CIVIL RIGHTS COMPLAINT UNDER
CIVIL RULE 3

-and-

42 U.S.C. SECTIONS 1981, 1983,
1985(3), 1986, and 1988(b)(c)

JURY TRIAL DEMAND ATTACHED

EXHIBIT

1

17

E2666 - E94



· APRIL BURNS
[REDACTED]
Detroit, Michigan [REDACTED]

-and- :

· ANGEL BURNS MYLES
[REDACTED]
Detroit, Michigan [REDACTED]

-and- :

· BRENDA JACKSON
[REDACTED]
Detroit, Michigan [REDACTED]

-and- :

- JAMEL PITTMAN
[REDACTED]
Detroit, Michigan [REDACTED]

Plaintiff(s), :

-against- :

· OHIO'S STATE HIGHWAY PATROL
1970 W. Broad Street
P.O. Box 182074
Columbus, Ohio 43218-2074

-and- :

· STATE TROOPER, CHRISTOPHER BEYER
1970 W. Broad Street
P.O. Box 182074
Columbus, Ohio 43218-2074

-and- :

· STATE TROOPER, MICHAEL TRADER
1970 W. Broad Street
P.O. Box 182074
Columbus, Ohio 43218-2074

-and- :

· STATE TROOPER, K-9 ARGO
1970 W. Broad Street
P.O. Box 182074
Columbus, Ohio 43218-2074

-and- :

E2666 - E95

COPY

DRUG ENFORCEMENT ADMINISTRATION (DEA) :
SPECIAL AGENT, GENO TALIANO :
1375 E. 9th Street, Ste. 700 :
Cleveland, Ohio 44114 . :

-and- :

DRUG ENFORCEMENT ADMINISTRATION (DEA) :
SPECIAL AGENT, CAPTILIN SZCZEPLNSKI :
1375 E. 9th Street, Ste. 700 :
Cleveland, Ohio 44114 . :

-and- :

LORAIN COUNTY PROSECUTOR, DENNIS P. WILL :
THE JUSTICE CENTER, 3rd Floor :
225 Court Street :
Elyria, Ohio 44035 . :

-and- :

LORAIN COUNTY ASSISTANT PROSECUTOR, MARY :
SLANCZKA, THE JUSTICE CENTER, 3rd Floor :
225 Court Street :
Elyria, Ohio 44035 . :

-and- :

LORAIN COUNTY ASSISTANT PROSECUTOR, JENN- :
IFER M. RIEDTHALER, THE JUSTICE CENTER, :
3rd Floor :
225 Court Street :
Elyria, Ohio 44035 . :

-and- :

LORAIN COUNTY ASSISTANT PROSECUTOR, PETER :
J. GAUTHIER, THE JUSTICE CENTER, 3rd Flo- :
or, :
225 Court Street :
Elyria, Ohio 44035 . :

-and- :

LORAIN COUNTY ASSISTANT PROSECUTOR, LAURA :
ANN DESZORT, THE JUSTICE CENTER, 3rd Floor, :
225 Court Street :
Elyria, Ohio 44035 . :

-and- :

E2666 - E96



· JACK W. BRADLEY, ATTORNEY AT LAW, :
520 BROADWAY, 3rd Floor :
Lorain, Ohio 44052. :

-and- :
:

· MARK A. AUFDENKAMPE, ATTORNEY AT LAW, :
33399 Walker Road, Ste. A :
Avon Lake, Ohio 44012 :

-and- :
:

· PAUL A. GRIFFIN, ATTORNEY AT LAW, :
600 Broadway, 2nd Floor :
Lorain, Ohio 44052 :

-and- :
:

· PAUL A. MANCINO, JR., ATTORNEY AT LAW, :
75 Public Square, Ste. 1016 :
Cleveland, Ohio 44113-2098 :

-and- :
:

· EDWARD ZALESKI, Retired Judge, :
The Justice Center, 7th Floor :
225 Court Street, :
Elyria, Ohio 44035 :

-and- :
:

· JOHN R. MIRALDI, JUDGE, :
The Justice Center, 7th Floor :
225 Court Street :
Elyria, Ohio 44035 :

(These defendant(s) are sued in their :
official and individual capacities) :

Defendant(s). :
:

JURISDICTION:

1. This court has jurisdiction of this Civil Rights Action pursuant to the provisions of 28 U.S.C. §1343(a)(3). In addition, this is an action in equity that arises out of 42 U.S.C. §§1981, 1983, 1985(3), 1986, and 1988(b)(c), and the rights, privileges and immunities sought to be secured by this action are rights, privileges and immunities guaranteed by the Due Process and Equal Protection Clauses of the Fourteenth Amendment to the Constitution of the United States. Therefore, this court also has jurisdiction of this action under 28 U.S.C. §1331.

PARTIES:

2. Clifton A. Jackson #A652-163, Lake Erie Correctional Institution. [LaECI],
501 Thompson Road, P.O. Box 8000, Conneaut, Ohio 44030 -Plaintiff;

E2666 - E97

COPY

3. Alexander Jamison, 117 Weaver Street, Buffalo, New York 14206 -Plaintiff;
4. Amber Powlak, 117 Weaver Street, Buffalo, New York 14206 -Plaintiff;
5. Mason Jackson, 117 Weaver Street, Buffalo, New York 14206 -Plaintiff;
6. Moneh Fuller, 117 Weaver Street, Buffalo, New York 14206 -Plaintiff;
7. Roman Motley, 117 Weaver Street, Buffalo, New York 14206 -Plaintiff;
8. Elijah Fuller, 117 Weaver Street, Buffalo, New York 14206 -Plaintiff;
9. Lorrionna Jackson, 117 Weaver Street, Buffalo, New York 14206 -Plaintiff;
10. April Burns, 8900 East Jefferson Avenue, Apt. 304, Detroit, Michigan 48214 -Plaintiff;
11. Angel Burns Myles, 8900 East Jefferson Avenue, Apt. 304, Detroit, Michigan 48214 -Plaintiff;
12. Brenda Jackson, 8900 East Jefferson Avenue, Apt. 304, Detroit, Michigan 48214 -Plaintiff;
13. Jamel Pittman, 8900 East Jefferson Avenue, Apt. 304, Detroit, Michigan 48214 -Plaintiff;
14. STATE OF OHIO OFFICE OF THE STATE HIGHWAY PATROL, 1970 West Broad Street, P.O. Box 182074, Columbus, Ohio 43215-2074 -Defendant;
15. STATE TROOPER, Christopher Beyer, Office of the State Highway Patrol, 1970 West Broad Street, P.O. Box 182074, Columbus, Ohio 43215-2074 -Defendant;
16. STATE TROOPER, Michael Trader, Office of the State Highway Patrol, 1970 West Broad Street, P.O. Box 182074, Columbus, Ohio 43215-2074 -Defendant;
17. STATE TROOPER, K-9 Argo, Office of the State Highway Patrol, 1970 West Broad Street, P.O. Box 182074, Columbus, Ohio 43215-2074 -Defendant;
18. DRUG ENFORCEMENT ADMINISTRATION (DEA) SPECIAL AGENT, Geno Taliano, 1375 East 9th Street, Ste. 700, Cleveland, Ohio 44114 -Defendant;
19. DRUG ENFORCEMENT ADMINISTRATION (DEA) SPECIAL AGENT, Caitlin Szczepinski, 1375 East 9th Street, Ste. 700, Cleveland, Ohio 44114 -Defendant;
20. LORAIN COUNTY PROSECUTOR, Dennis P. Will, The Justice Center, 3rd Floor, 225 Court Street, Elyria, Ohio 44035 -Defendant;
21. LORAIN COUNTY ASSISTANT PROSECUTOR, Mary Alanczka, The Justice Center, 3rd Floor, 225 Court Street, Elyria, Ohio 44035 -Defendant;
22. LORAIN COUNTY ASSISTANT PROSECUTOR, Jennifer M. Riedthaler, The Justice Center, 3rd Floor, 225 Court Street, Elyria, Ohio 44035 -Defendant;
23. LORAIN COUNTY ASSISTANT PROSECUTOR, Peter J. Ganthier, The Justice Center, 3rd Floor, 225 Court Street, Elyria, Ohio 44035 -Defendant;
24. LORAIN COUNTY ASSISTANT PROSECUTOR, Laura Ann Dezort, The Justice Center, 3rd Floor, 225 Court Street, Elyria, Ohio 44035 -Defendant;
25. Jack W. Bradley, Attorney at Law, 520 Broadway, 3rd Floor, Lorain, Ohio 44052 -Defendant;
26. Mark A. Aufdenkampe, Attorney at Law, 33399 Walker Road, Ste. A, Avon Lake, Ohio 44012 -Defendant;
27. Paul A. Griffin, Attorney at Law, 600 Broadway, 2nd Floor, Lorain, Ohio 44052 -Defendant;
28. Paul A. Mancuso, Jr., Attorney at Law, 75 Public Square, Ste. 1016, Cleveland, Ohio 44113-2098 -Defendant;

E2666 - E98

29. Edward Zaleski [retired Judge], The Justice Center, 7th Floor, 225 Court Street, Elyria, Ohio 44035 **COPY** -Defendant;
30. John R. Miraldi, Judge, The Justice Center, 7th Floor, 225 Court Street, Elyria, Ohio 44035 -Defendant;

CLAIM NUMBER 1:

31. Plaintiffs alleges that Defendant - Ohio's State Highway Patrol by it's act or failure to act in protecting the Plaintiffs from acts of discrimination committed under the color of law by it's troopers and employees of conspiring to deprive Plaintiffs of constitutional rights [equal protection & due process] under provisions of the Fourth, Fifth, Eighth and Fourteenth Amendments to the United States Constitution by engaging in an overt act in furtherance of the conspiracy and as a direct result of Defendant's troopers and employees overt act, Plaintiff has suffered injuries of intentional infliction of emotional distress, intentional discriminatory prosecution, intentional tort, consortium and intentional deprivation of the above-stated state and federally protected rights to the Constitution of the United States and Laws. Said deprivations commencing on June 14, 2011 and continuing to date, which intentional acts were racially motivated and substantially certain to produce deprivation of Plaintiffs' constitutional rights. Defendant's troopers and employees engaged in an overt act with malicious purpose, in bad faith, or in a wanton or reckless manner, which form the basis for stating Civ.R. 3; 42 U.S.C. §§1981, 1983, 1985(3), and 1986 Claim Number 1. See 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 Assignments Of Error I Through IV and Appendix of Exhibits A Through AAAE. This Defendant is sued in it's official capacity under the "Doctrine of Respondent Superior";

CLAIM NUMBER 2:

32. Plaintiffs alleges that Defendant - Christopher Beyer a trooper employed by the Ohio State Highway Patrol while acting under the color of law conspired to deprive Plaintiffs of constitutional rights [equal protection & due process] under provisions of the Fourth, Fifth, Eighth and Fourteenth Amendments to the United States Constitution by engaging in an overt act in furtherance of the conspiracy and as a direct result of Defendant's overt act, Plaintiffs has suffered injuries of intentional infliction of emotional distress, intentional discriminatory prosecution, intentional tort, consortium and intentional deprivation of the above-stated state and federally protected rights to the Constitution of the United States and Laws. Said deprivations commencing on June 14, 2011 and continuing to date, which intentional acts were racially motivated and substantially certain to produce deprivation of Plaintiffs' constitutional rights. Defendant engaged in an overt act with malicious purpose, in bad faith, or in a wanton or reckless manner, which form the basis for stating Civ.R. 3; 42 U.S.C. §§1981, 1983, 1985(3), and 1986 Claim Number 2. See 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 Assignments Of Error I Through IV and Appendix of Exhibits A Through AAAE. This Defendant is sued in his official and individual capacities;

CLAIM NUMBER 3:

33. Plaintiffs alleges that Defendant - Michael Trader a trooper employed by the

E2666 - E99

Ohio State Highway Patrol while acting under the color of law conspired to deprive Plaintiffs of constitutional rights [equal protection & due process] under provisions of the Fourth, Fifth, Eighth and Fourteenth Amendments to the United States Constitution by engaging in an overt act in furtherance of the conspiracy and as a direct result of Defendant's overt act, Plaintiffs has suffered injuries of intentional infliction of emotional distress, intentional discriminatory prosecution, intentional tort, consortium and intentional deprivation of the above-stated state and federally protected rights to the Constitution of the United States and Laws. Said deprivations commencing on June 14, 2011 and continuing to date, which intentional acts were racially motivated and substantially certain to produce deprivation of Plaintiffs' constitutional rights. Defendant engaged in an overt act with malicious purpose, in bad faith, or in a wanton or reckless manner, which form the basis for stating Civ.R. 3; 42 U.S.C. §§1981, 1983, 1985(3), and 1986 Claim Number 3. See 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 Assignments Of Error I Through IV and Appendix of Exhibits A Through AAEE. This Defendant is sued in his official and individual capacities;

CLAIM NUMBER 4:

34. Plaintiffs alleges that Defendant - Argo is a canine trooper employed by the Ohio State Highway Patrol while acting under the color of law conspired to deprive Plaintiffs of constitutional rights [equal protection & due process] under provisions of the Fourth, Fifth, Eighth and Fourteenth Amendments to the United States Constitution by engaging in an overt act in furtherance of the conspiracy and as a direct result of Defendant's overt act, Plaintiffs has suffered injuries of intentional infliction of emotional distress, intentional discriminatory prosecution, intentional tort, consortium and intentional deprivation of the above-stated state and federally protected rights to the Constitution of the United States and Laws. Said deprivations commencing on June 14, 2011 and continuing to date, which intentional acts were racially motivated and substantially certain to produce deprivation of Plaintiffs' constitutional rights. Defendant engaged in an overt act with malicious purpose, in bad faith, or in a wanton or reckless manner, which form the basis for stating Civ.R. 3; 42 U.S.C. §§1981, 1983, 1985(3), and 1986 Claim Number 4. See 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 Assignments Of Error I Through IV and Appendix of Exhibits A Through AAEE. This Defendant is sued in his official and individual capacities;

CLAIM NUMBER 5:

35. Plaintiffs alleges that Defendant - Geno Tallano is a Special Agent employed by the Drug Enforcement Administration (DEA) while acting under the color of law conspired to deprive Plaintiffs of constitutional rights [equal protection & due process] under provisions of the Fourth, Fifth, Eighth and Fourteenth Amendments to the United States Constitution by engaging in an overt act in furtherance of conspiracy and as a direct result of Defendant's overt act, Plaintiffs has suffered injuries of intentional infliction of emotional distress, intentional discriminatory prosecution, intentional tort, consortium and intentional deprivation of the above-stated state and federally protected rights to the Constitution of the United States and Laws. Said deprivation commencing on June 14, 2011 and continuing to date, which intentional acts were racially motivated and substant-

E2666 - F1

COPY

ially certain to produce deprivation of Plaintiffs' constitutional rights. Defendant engaged in an overt act with malicious purpose, in bad faith, or in a wanton or reckless manner, which form the basis for stating Civ.R. 3; 42 U.S.C. §§1981, 1983, 1985(3), and 1986 Claim Number 5. See 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 Assignments Of Error I Through IV and Appendix of Exhibits A Through AAAE. This Defendant is sued in his official individual capacities;

CLAIM NUMBER 6:

36. Plaintiffs alleges that Defendant - Caitlin Szczepinski is a Special Agent employed by the Drug Enforcement Administration (DEA) while acting under the color of law conspired to deprive Plaintiffs of constitutional rights [equal protection & due process] under provisions of the Fourth, Fifth, Eighth and Fourteenth Amendments to the United States Constitution by engaging in an overt act in furtherance of the conspiracy and as a direct result of Defendant's overt act, Plaintiffs has suffered injuries of intentional infliction of emotional distress, intentional discriminatory prosecution, intentional tort, consortium and intentional deprivation of the above-stated state and federally protected rights to the Constitution of the United States and Laws. Said deprivations commencing on June 14, 2011 and continuing to date, which intentional acts were racially motivated and substantially certain to produce deprivation of Plaintiffs' constitutional rights. Defendant engaged in an overt act with malicious purpose, in bad faith, or in a wanton or reckless manner, which form the basis for stating Civ.R. 3; 42 U.S.C. §§1981, 1983, 1985(3), and 1986 Claim Number 6. See 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 Assignments Of Error I Through IV and Appendix of Exhibits A Through AAAE. This Defendant is sued in his official and individual capacities;

CLAIM NUMBER 7:

37. Plaintiffs alleges that Defendant - Dennis P. Will is the Lorain County Prosecutor while acting under the color of law conspired to deprive Plaintiffs of constitutional rights [equal protection & due process] under provisions of the Fourth, Fifth, Eighth and Fourteenth Amendments to the United States Constitution by engaging in an overt act in furtherance of the conspiracy and as a direct result of Defendant's overt act, Plaintiffs has suffered injuries of intentional infliction of emotional distress, intentional discriminatory prosecution, intentional tort, consortium and intentional deprivation of the above-stated state and federally protected rights to the Constitution of the United States and Laws. Said deprivation commencing on June 14, 2011 and continuing to date, which intentional acts were racially motivated and substantially certain to produce deprivation of Plaintiffs' constitutional rights. Defendant engaged in an overt act with malicious purpose, in bad faith, or in a wanton or reckless manner, which form the basis for stating Civ.R. 3; 42 U.S.C. §§1981, 1983, 1985(3), and 1986 Claim Number 7. See 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 Assignments Of Error I Through IV and Appendix of Exhibits A Through AAAE. This Defendant is sued in his official and individual capacities;

E2666 - F2

COPY

CLAIM NUMBER 8:

38. Plaintiffs alleges that Defendant - Mary Slanczka is a Lorain County Assistant Prosecuting Attorney while acting under the color of law conspired to deprive of constitutional rights [equal protection & due process] under provisions of the Fourth, Fifth, Eighth and Fourteenth Amendments to the United States Constitution by engaging in an overt act in furtherance of the conspiracy and as a direct result of Defendant's overt act, Plaintiffs has suffered injuries of intentional infliction of emotional distress, intentional discriminatory prosecution, intentional tort, consortium and intentional deprivation of the above-stated state and federally protected rights to the Constitution of the United States and Laws. Said deprivation commencing on June 14, 2011 and continuing to date, which intentional acts were racially motivated and substantially certain to produce deprivation of Plaintiffs' constitutional rights. Defendant engaged in an overt act which form the basis for stating Civ.R. 3; 42 U.S.C. §§1981, 1983, 1985(3), 1986, and 1988(b)(c) Claim Number 8. See 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 Assignments Of Error I Through IV and Appendix of Exhibits A Through AA&E. This Defendant is sued in her official and individual capacities;

CLAIM NUMBER 9:

39. Plaintiffs alleges that Defendant - Jennifer M. Riedthaler is a Lorain County Assistant Prosecuting Attorney while acting under the color of law conspired to deprive Plaintiffs of constitutional rights [equal protection and due process] under provisions of the Fourth, Fifth, Eighth and Fourteenth Amendments to the United States Constitution by engaging in an overt act in furtherance of the conspiracy and as a direct result of Defendant's overt act, Plaintiffs has suffered injuries of intentional infliction of emotional distress, intentional discriminatory prosecution, intentional tort, consortium and intentional deprivation of the above-stated state and federally protected rights to the Constitution of the United States and Laws. Said deprivation commencing on June 14, 2011 and continuing to date, which intentional acts were racially motivated and substantially certain to produce deprivation of Plaintiffs' constitutional rights. Defendant engaged in an overt act which form the basis for stating Civ.R. 3; 42 U.S.C. §§1981, 1983, 1985(3), 1986, and 1988(b)(c) Claim Number 9. See 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 Assignments Of Error I Through IV and Appendix of Exhibits A Through AA&E. This Defendant is sued in her official and individual capacities;

CLAIM NUMBER 10:

40. Plaintiffs alleges that Defendant - Peter J. Gauthier is a Lorain County Prosecuting Attorney while acting under the color of law conspired to deprive Plaintiffs of constitutional rights [equal protection and due process] under provisions of the Fourth, Fifth, Eighth and Fourteenth Amendments to the United States Constitution by engaging in an overt act in furtherance of the conspiracy and as a direct result of Defendant's overt act, Plaintiffs has suffered injuries of intentional infliction of emotional distress, intentional discriminatory prosecution, intentional tort, consortium and intentional deprivation of the above-stated state and federally protected rights to the Constitution

E2666 - F3

of the United States and Laws. Said deprivation commencing on June 14, 2011 and continuing to date, which intentional acts were racially motivated and substantially certain to produce deprivation of Plaintiffs' constitutional rights. Defendant engaged in an overt act which form the basis for stating Civ.R. 3; 42 U.S.C. §§1981, 1983, 1985(3), 1986, and 1988(b)(c) Claim Number 10. See 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 Assignments Of Error I Through IV and Appendix of Exhibits A Through AA-AE. This Defendant is sued in his official and individual capacities;

COPY

CLAIM NUMBER 11:

41. Plaintiffs alleges that Defendant - Laura Ann Dezort is a Lorain County Prosecuting Attorney while acting under the color of law conspired to deprive Plaintiffs of constitutional rights [equal protection and due process] under provisions of the Fourth, Fifth, Eighth and Fourteenth Amendments to the United States Constitution by engaging in an overt act in furtherance of the conspiracy and as a direct result of Defendant's overt act, Plaintiffs has suffered injuries of intentional infliction of emotional distress, intentional discriminatory prosecution, intentional tort, consortium and intentional deprivation of the above-stated state and federally protected rights to the Constitution of the United States and Laws. Said deprivation commencing on June 14, 2011 and continuing to date, which intentional acts were racially motivated and substantially certain to produce deprivation of Plaintiffs' constitutional rights. Defendant engaged in an overt act which form the basis for stating Civ.R. 3; 42 U.S.C. §§1981, 1983, 1985(3), 1986, and 1988(b)(c) Claim Number 11. See 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 Assignments Of Error I Through IV and Appendix of Exhibits A Through AA-AE. This Defendant is sued in her official and individual capacities;

CLAIM NUMBER 12:

42. Plaintiffs alleges that Defendant - Jack W. Bradley is an attorney of law, in the private practice of law in the State of Ohio, Lorain County while acting under the color of law conspired to deprive Plaintiffs of constitutional rights [right to counsel and fair trial] under provisions of the Fourth, Fifth, Sixth and Fourteenth Amendments to the United States Constitution by engaging in an overt act in furtherance of the conspiracy and as a direct result of Defendant's overt act, Plaintiffs has suffered injuries of intentional infliction of emotional distress, intentional malpractice, intentional tort of malpractice, consortium and intentional deprivation of the above-stated state and federally protected rights to the Constitution of the United States and Laws. Said deprivation commencing on or about June 17, 2011 and continuing to date, which intentional malpractice acts were personally motivated and substantially certain to produce deprivation of Plaintiffs' constitutional rights. Defendant engaged in overt act which form the basis for stating Civ.R. 3; 42 U.S.C. §§1981, 1983, 1985(3), 1986, and 1988(b)(c) Claim Number 12. See 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 Assignments Of Error I Through IV and Appendix of Exhibits

E2666 - F4

A Through AAAB. This Defendant is sued in his official and individual capacities;



CLAIM NUMBER 13:

43. Plaintiffs alleges the Defendant - Mark A. Aufdenkaupe is an attorney of law in the private practice of law in the State of Ohio, Lorain County while acting under the color of law conspired to deprive Plaintiffs of constitutional rights [right to counsel and fair trial] under provisions of the Fourth, Fifth, Sixth and Fourteenth Amendments to the United States Constitution by engaging in an overt act in furtherance of the conspiracy and as a direct result of Defendant's overt act, Plaintiffs has suffered injuries of intentional infliction of emotional distress, intentional malpractice, intentional tort of malpractice, consortium and intentional deprivation of the above-stated state and federally protected rights to the Constitution of the United States and Laws. Said deprivation commencing on or about November 25, 2013 and continuing to date, which intentional malpractice acts were personally motivated and substantially certain to produce deprivation of Plaintiffs' constitutional rights. Defendant engaged in an overt act which form the basis for stating Civ.R. 3; 42 U.S.C. §§1981, 1983, 1985(3), 1986, and 1988(b)(c) Claim Number 13. See 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 Assignments Of Error I Through IV and Appendix of Exhibits A Through AAAB. This Defendant is sued in his official and individual capacities;

CLAIM NUMBER 14:

44. Plaintiffs alleges that Defendant - Paul A. Griffin is an attorney of law in the private practice of law in the State of Ohio, Lorain County while acting under the color of law conspired to deprive Plaintiffs of constitutional rights [right to counsel and fair appellate review] under provisions of the Fourth, Fifth, Sixth and Fourteenth Amendments to the United States Constitution by engaging in an overt act in furtherance of the conspiracy and as a direct result of Defendant's overt act, Plaintiffs has suffered injuries of intentional infliction of emotional distress, intentional malpractice, intentional tort of malpractice, consortium and intentional deprivation of the above-stated state and federally protected rights to the Constitution of the United States and Laws. Said deprivation commencing on or about April 9, 2014 and continuing to date, which intentional malpractice acts were personally motivated and substantially certain to produce deprivation of Plaintiffs' constitutional rights. Defendant engaged in an overt act which form the basis for stating Civ.R. 3; 42 U.S.C. §§1981, 1983, 1985(3), 1986, and 1988(b)(c) Claim Number 14. See 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 Assignments Of Error I Through IV and Appendix of Exhibits A Through AAAB. This Defendant is sued in his official and individual capacities;

CLAIM NUMBER 15:

45. Plaintiffs alleges that Defendant - Paul A. Mancino, Jr., is an attorney of law in the private practice of law in the State of Ohio, Cuyahoga County while acting under the color of law conspired to deprive Plaintiffs of constitu-

E2666 - F5

COPY

TIONAL RIGHTS [right to counsel and fair appellate review] in the provisions of the Fourth, Fifth, Sixth and Fourteenth Amendments to the United States Constitution by engaging in an overt act in furtherance of the conspiracy and as a direct result of Defendant's overt act, Plaintiffs has suffered injuries of intentional infliction of emotional distress, intentional malpractice, intentional tort of malpractice, consortium and intentional deprivation of the above-stated state and federally protected rights to the Constitution of the United States and Laws. Said deprivation commencing on or about May 1, 2014 and continuing to date, which intentional malpractice acts were personally motivated and substantially certain to produce deprivation of Plaintiffs' constitutional rights. Defendant engaged in an overt act which form the basis for stating Civ.R. 3; 42 U.S.C. §§1981, 1983, 1985(3), 1986, and 1988 (b)(c) Claim Number 15. See 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 Assignments Of Error I Through IV and Appendix of Exhibits A Through AAEE. This Defendant is sued in his official and individual capacities;

CLAIM NUMBER 16:

46. Plaintiffs alleges that Defendant - Edward Zaleski is an Retired Lorain County Court of Common Pleas Judge while acting under the color of law conspired to deprive Plaintiffs of constitutional rights [equal protection & due process] under provisions of the Fourth, Fifth, Sixth, Eighth and Fourteenth Amendments to the United States Constitution by engaging in an overt act, in furtherance of the conspiracy and as a direct result of Defendant's overt act, Plaintiffs has suffered injuries of intentional infliction of emotional distress, intentional discriminatory prosecution, intentional tort, consortium and intentional deprivation of the above-stated state and federally protected rights to the Constitution of the United States and Laws. Said deprivations commencing on June 14, 2011; June 4, 2012; and August 14, 2012 and continuing to date, which intentional acts were racially motivated and substantially certain to produce deprivation of Plaintiffs' constitutional rights. Defendant engaged in an overt act with malicious purpose, in bad faith, or in a wanton or reckless manner, which form the basis for stating Civ. R. 3; 42 U.S.C. §§1981, 1983, 1985(3), 1986, and 1988(b)(c) Claim Number 16. See 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 Assignments Of Error I Through IV and Appendix of Exhibits A Through AAEE. This Defendant is sued in his official and individual capacities;

CLAIM NUMBER 17:

47. Plaintiffs alleges that Defendant - John R. Miraldi is an Lorain County Court of Common Pleas Judge while acting under the color of law conspired to deprive Plaintiffs of constitutional rights [equal Protection & due process] under provisions of the Fourth, Fifth, Sixth, Eighth and Fourteenth Amendments to the United States Constitution by engaging in an overt act in furtherance of the conspiracy and as a direct result of Defendant's overt act, Plaintiffs has suffered injuries of intentional

E2666 - F6

COPY

infliction of emotional distress, intentional discriminatory, intentional tort, consortium and intentional deprivation of the above-stated state and federally protected rights to the Constitution of the United States and Laws. Said Deprivations commencing on or about June 14, 2011; November 18, 2013; and November 25, 2013 and continuing to date, which intentional acts were racially motivated and substantially certain to produce deprivation of Plaintiffs' constitutional rights. Defendant engaged in an overt act with malicious purpose, in bad faith, or in a wanton or reckless manner; which form the basis for stating Civ.R. 3; 42 U.S.C. §§1981, 1983, 1985(3), 1986, and 1988(b)(c) Claim Number 17. See 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 Assignments Of Error I Through IV and Appendix of Exhibits A Through AAAE. This Defendant is sued in his official and individual capacities;

- 48. Plaintiffs avers that a jury trial as demand and attached is the only proper proceeding for redress of the intentional injuries herein stated in Claim Numbers 1 through 17, wherein said trial by jury, proof of the Defendants' actions will be properly placed before a jury to determine where the truth lies, regardless of the Defendants' actual intent to the conspiracy, and each Defendant shall be treated by the law as if they had in fact desired to produce intentional deprivation of Plaintiffs' that has resulted from Defendants overt acts. Whenever it appears to a Court [as in the instant cause of action] upon complaint that any defendant has deprived Plaintiffs of rights, privileges and immunities, in violation of Civ.R. 3; 42 U.S.C. §§1981, 1983, 1985(3), 1986, and 1988, secured by the United States Constitution and Laws, this Court shall enter judgment appropriately in favor of the Plaintiffs, so prays the Plaintiffs.
- 49. Plaintiff(s) swear that the statements alleged in Claim Numbers 1 through 17 herein, are true and correct to the best of his knowledge and belief and states a claim upon which relief of violations of their Civil and Constitutional Rights may be addressed.

FURTHER AFFIANT SAYETH NAUGHT.

Clifton A. Jackson

FIRST PLAINTIFF PRO SE

Sworn to and subscribed to in my presence on this 13 day of July, 2016.

Rebecca Pryor
NOTARY PUBLIC



REBECCA PRYOR
Notary Public, State of Ohio
Recorded in Ashtabula County
My Commission Expires
November 08, 2020

E2666 - F7

DEMAND FOR RELIEF

COPY

THEREFORE, Plaintiffs demands judgment against the Defendants, as their liabilities appears: Compensatory, / Punitive, / Monetary Damages (C.D., P.D., and M.D.)

1. Defendant-State of Ohio's Highway Patrol, in it's official capacity for Monetary Damages (M.D.) of \$58,823,529.41;
2. Defendant-Christopher Beyer, in his official capacity for Punitive Damages (P. D.) of \$29,411,764.205;
Defendant-Christopher Beyer, in his individual capacity for Monetary Damages (M. D.) of \$29,411,764.205;
3. Defendant-Michael Trader, in his official capacity for Punitive Damages (P.D.) of \$29,411,764.205;
Defendant-Michael Trader, in his individual capacity for Monetary Damages (M.D.) of \$29,411,764.205;
4. Defendant-K-9 Argo, in his official capacity for Punitive Damages (P.D.) of \$29,411,764.205;
Defendant-K-9 Argo, in his individual capacity for Monetary Damages (M.D.) of \$29,411,764.205;
5. Defendant-Geno Taliano, in his official capacity for Punitive Damages (P.D.) of \$29,411,764.205;
Defendant-Geno Taliano, in his individual capacity for Monetary Damages (M.D.) of \$29,411,764.205;
6. Defendant-Caitlin Szczepinski, in his official capacity for Punitive Damages (P. D.) of \$29,411,764.205;
Defendant-Caitlin Szczepinski, in his individual capacity for Monetary Damages (M.D.) of \$29,411,764.205;
7. Defendant-Dennis P. Will, in his official capacity for Punitive Damages (P.D.) of \$29,411,764.205;
Defendant-Dennis P. Will, in his individual capacity for Monetary Damages (M.D.) of \$29,411,764.205;
8. Defendant-Mary Slanczka, in her official capacity for Punitive Damages (P.D.) of \$29,411,764.205;
Defendant-Mary Slanczka, in her individual capacity for Monetary Damages (M.D.) of \$29,411,764.205;
9. Defendant-Jennifer M. Riedthaler, in her official capacity for Punitive Damages (P.D.) of \$29,411,764.205;
Defendant-Jennifer M. Riedthaler, in her individual capacity for Monetary Damages (M.D.) of \$29,411,764.205;
10. Defendant-Peter J. Gauthier, in his official capacity for Punitive Damages (M. D.) of \$29,411,764.205;
Defendant-Peter J. Gauthier, in his individual capacity for Monetary Damages (M.D.) of \$29,411,764.205;
11. Defendant-Laura Ann Dezort, in her official capacity for Punitive Damages (P.D.) of \$29,411,764.205;
Defendant-Laura Ann Dezort, in her individual capacity for Monetary Damages (M. D.) of \$29,411,764.205;

E2666 - F8

COPY
\$29,411,764.205;

- 12. Defendant-Jack W. Bradley, in his official capacity for Punitive Damages (P.D.) of Defendant-Jack W. Bradley, in his individual capacity for Monetary Damages (M.D.) of \$29,411,764.205;
 - 13. Defendant-Mark A. Aufdenkampe, in his official capacity for Punitive Damages (P.D.) of Defendant-Mark A. Aufdenkampe, in his individual capacity for Monetary Damages (M.D.) of \$29,411,764.205;
 - 14. Defendant-Paul A. Griffin, in his official capacity for Punitive Damages (P.D.) of Defendant-Paul A. Griffin, in his individual capacity for Monetary Damages (M.D.) of \$29,411,764.205;
 - 15. Defendant-Paul A. Mancino, Jr., in his official capacity for Punitive Damages (P.D.) of Defendant-Paul A. Mancino, Jr., in his individual capacity for Monetary Damages (M.D.) of \$29,411,764.205;
 - 16. Defendant-Edward Zaleski, in his official capacity for Punitive Damages (P.D.) of Defendant-Edward Zaleski, in his individual capacity for Monetary Damages (M.D.) of \$29,411,764.205;
 - 17. Defendant-John R. Miraldi, in his official capacity for Punitive Damages (P.D.) of Defendant-John R. Miraldi, in his individual capacity for Monetary Damages (M.D.) of \$29,411,764.205;
- Total Damages Amount Sought - \$1,000,000,000.00

Together with the costs and disbursement. So Prays your Plaintiffs.

Dated: 7/13/16

Clifton A. Jackson

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

PLAINTIFF(S)

*SUBSCRIBED AND SWORN TO ME THIS 13th DAY OF JULY, 2016.
Rebecca M. J. - NOTARY*



REBECCA PRYOR
Notary Public, State of Ohio
Recorded in Ashtabula County
My Commission Expires
November 08, 2020

E2666 - F9

IN THE COURT OF COMMON PLEAS
FRANKLIN COUNTY, OHIO
CIVIL DIVISION

COPY

Clifton A. Jackson #A652-163, Et Al.,	:	
Plaintiffs,	:	Civil Case No.
-against-	:	JUDGE:
OHIO'S STATE HIGHWAY PATROL, Et Al.,	:	<u>JURY DEMAND CIV.R. 38</u>
Defendants.	:	

NOW COMES the Plaintiffs, Clifton A. Jackson, and makes their demand for trial by "Jury" of the above-styled cause of action pursuant to Civil Rule 38 of the Ohio Rules of Civil Procedure.

NOTARY-REBECCA PRYOR
SWORN TO ME THIS 13 DAY OF
July, 2016.

REBECCA PRYOR - Notary



REBECCA PRYOR
Notary Public, State of Ohio
Recorded in Ashtabula County
My Commission Expires
November 08, 2020

Respectfully submitted,

Clifton A. Jackson

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

PLAINTIFF(S)

PROOF OF SERVICE

I, Clifton A. Jackson, certify that a true copy of the foregoing "CIVIL RIGHTS COMPLAINT UNDER CIV.R. 3 and 42 U.S.C. SECTIONS 1981, 1983, 1985(3), 1986, and 1988 (b)(c)" and "Jury Demand pursuant to Civ.R. 38" and "AFFIDAVIT OF PLAINTIFF "CLIFTON A. JACKSON'S PRIOR CIVIL ACTIONS FILED IN THE PAST 5 YEARS" was filed with the Franklin County Clerk of Courts, with instructions to serve Defendants, being mail to 373 S. High Street, 23rd Floor, Columbus, Ohio 43215-4591 on this 13 day of July , 2016.

Clifton A. Jackson

PLAINTIFF(S)

E2666 - F10

IN THE COURT OF COMMON PLEAS
FRANKLIN COUNTY, OHIO
CIVIL DIVISION

COPY

Clifton A. Jackson #A652-163, Et Al., :
Plaintiffs, :
-against- : Civil Case No.
OHIO'S STATE HIGHWAY PATROL, Et Al., :
Defendants. :

STATE OF OHIO)
)ss: AFFIDAVIT OF PLAINTIFF "CLIFTON A. JACKSON'S PRIOR
COUNTY OF ASHTABULA) CIVIL ACTIONS FILED IN THE PAST 5 YEARS

I, Clifton A. Jackson, do hereby swear that I am the First Plaintiff in this Civil Action filed under Civ.R. 3 and 42 U.S.C. §§1981, 1983, 1985(3), 1986, and 1988(b)(c). And in compliance with R.C. §2969.25, states that I have not filed any Civil Actions in the past 5 years.

Further Affiant sayeth naught.

Clifton A. Jackson
Plaintiff

Sworn to and subscribed to in my presence on this 13 day of July, 2016.

Rebecca Pryor
NOTARY PUBLIC



REBECCA PRYOR
Notary Public, State of Ohio
Recorded in Ashtabula County
My Commission Expires
November 08, 2020

✓



Home Case Information Online Court Schedule

Last Name: First Name: Middle Init: Court: All Case: 17 CV 000616

Advanced Search

CIVIL CASE DETAIL

CASE NUMBER
17 CV 000616

TYPE of CASE
OTHER CIVIL

STATUS
ACTIVE

DATE FILED
01/20/2017

JUDGE
DAVID C YOUNG

COURTROOM
COURTROOM 7A
345 SOUTH HIGH STREET
7TH FLOOR
COLUMBUS, OH 43215

PLAINTIFF(S)

Name	Attorney
<input type="checkbox"/> CLIFTON A JACKSON	CLIFTON A JACKSON
<input type="checkbox"/> ALEXANDER JEMISON	ALEXANDER JEMISON
<input type="checkbox"/> AMBER POWLAK	AMBER POWLAK
<input type="checkbox"/> MASON JACKSON	MASON JACKSON
<input type="checkbox"/> MONEH FULLER	MONEH FULLER
<input type="checkbox"/> ROMAN MOTLEY	ROMAN MOTLEY
<input type="checkbox"/> ELIJAH FULLER	ELIJAH FULLER
<input type="checkbox"/> LORRIONNA JACKSON	LORRIONNA JACKSON
<input type="checkbox"/> APRIL BURNS	APRIL BURNS
<input type="checkbox"/> ANGEL BURNS MYLES	ANGEL BURNS MYLES

DEFENDANT(S)

Name	Attorney
<input type="checkbox"/> OHIO STATE HIGHWAY PATROL	NO ATTORNEY ON RECORD
<input type="checkbox"/> OHIO STATE TROOPER CHRISTOPHER BEYER	NO ATTORNEY ON RECORD
<input type="checkbox"/> OHIO STATE TROOPER MICHAEL TRADER	NO ATTORNEY ON RECORD
<input type="checkbox"/> OHIO STATE TROOPER K-9 ARGO	NO ATTORNEY ON RECORD
<input type="checkbox"/> DRUG ENFORCEMENT ADMN SPECIAL AGENT GEN O	NO ATTORNEY ON RECORD
<input type="checkbox"/> DRUG ENFORCEMENT ADMN SPECIAL AGENT CAI TL	NO ATTORNEY ON RECORD
<input type="checkbox"/> LORAIN CO PROSECUTOR DENNIS P WILL-	NO ATTORNEY ON RECORD
<input type="checkbox"/> LORAIN CO ASST PROSECUTOR MARY SIANCZKA	NO ATTORNEY ON RECORD
<input type="checkbox"/> LORAIN CO ASST PROSECUTOR JENNIFER M RI ED	NO ATTORNEY ON RECORD
<input type="checkbox"/> LORAIN CO ASST PROSECUTOR PETER J GAUTH IE	NO ATTORNEY ON RECORD

CASE SCHEDULE

Date	Description
01/20/17	CASE FILED
*****	INITIAL STATUS CONFERENCE
03/09/17	INITIAL JOINT DISCLOSURE OF ALL WITNESSES
03/04/17	SUPPLEMENTAL JOINT DISCLOSURE OF ALL WITNESSES
08/18/17	TRIAL CONFIRMATION DATE
10/27/17	DISPOSITIVE MOTIONS
11/10/17	DISCOVERY CUT-OFF
12/22/17	DECISIONS ON MOTIONS
01/03/18	FINAL PRE-TRIAL CONFERENCE/ORDER (OR BOTH)
02/05/18	TRIAL ASSIGNMENT

DOCKET

Show All Descriptions

Select Docket Category

All

Date	Description	Image	Fiche	Frame	Pages
<input checked="" type="checkbox"/> 02/23/17	ANSWER TO COMPLAINT		UP000	A01	2
<input checked="" type="checkbox"/> 02/23/17	APPEARANCE FILED		UP000	A01	2
<input checked="" type="checkbox"/> 02/17/17	NOTICE OF APPEARANCE FILED	<input checked="" type="checkbox"/>	0D463	Y10	4
<input checked="" type="checkbox"/> 02/17/17	CONSENT TO MOVE OR PLEAD	<input checked="" type="checkbox"/>	0D463	Y10	4
<input checked="" type="checkbox"/> 02/17/17	APPEARANCE FILED				
<input checked="" type="checkbox"/> 02/06/17	SERVICE COMPLETE - CERTIFIED MAIL	<input checked="" type="checkbox"/>	E2674	U80	1
<input checked="" type="checkbox"/> 02/06/17	SERVICE COMPLETE - CERTIFIED MAIL	<input checked="" type="checkbox"/>	E2674	U79	1
<input checked="" type="checkbox"/> 02/06/17	SERVICE COMPLETE - CERTIFIED MAIL	<input checked="" type="checkbox"/>	E2674	U78	1
<input checked="" type="checkbox"/> 02/06/17	SERVICE COMPLETE - CERTIFIED MAIL	<input checked="" type="checkbox"/>	E2674	U77	1
<input checked="" type="checkbox"/> 02/06/17	SERVICE COMPLETE - CERTIFIED MAIL	<input checked="" type="checkbox"/>	E2674	U76	1
<input checked="" type="checkbox"/> 02/06/17	SERVICE COMPLETE - CERTIFIED MAIL	<input checked="" type="checkbox"/>	E2674	U75	1
<input checked="" type="checkbox"/> 02/06/17	SERVICE COMPLETE - CERTIFIED MAIL	<input checked="" type="checkbox"/>	E2674	U74	1
<input checked="" type="checkbox"/> 02/06/17	SERVICE COMPLETE - CERTIFIED MAIL	<input checked="" type="checkbox"/>	E2674	U73	1
<input checked="" type="checkbox"/> 02/06/17	SERVICE COMPLETE - CERTIFIED MAIL	<input checked="" type="checkbox"/>	E2674	U72	1
<input checked="" type="checkbox"/> 02/06/17	SERVICE COMPLETE - CERTIFIED MAIL	<input checked="" type="checkbox"/>	E2674	U71	1
<input checked="" type="checkbox"/> 02/06/17	SERVICE COMPLETE - CERTIFIED MAIL	<input checked="" type="checkbox"/>	E2674	U70	1
<input checked="" type="checkbox"/> 02/06/17	SERVICE COMPLETE - CERTIFIED MAIL	<input checked="" type="checkbox"/>	E2674	U69	1

EXHIBIT
2

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

COPY

CLIFTON A. JACKSON, et al.,

Plaintiffs,

v.

OHIO STATE
HIGHWAY PATROL, et al.

Defendants.

CASE NO. 2:17-cv-00163

CERTIFICATION OF SCOPE OF EMPLOYMENT

I, Benjamin C. Glassman, the United States Attorney for the Southern District of Ohio, under the provisions of 28 U.S.C. § 2679(d), and by virtue of the authority vested in me by 28 C.F.R. § 15.4, hereby certify that I have read the Complaint of Plaintiffs Clifton A. Jackson, et al., filed in Franklin County Common Pleas Court on January 20, 2017, Case No. 17CV-01-616. On the basis of the information now available with respect to the incident referenced in the Complaint, I find that the individual federal defendants, DEA Task Force Officer Geno Taliano and DEA Special Agent Caitlin Szczepinski, were acting within the scope of their employment and office as employees of the United States Government at the time out of which Plaintiffs' claims arose.

Dated: 2/23/17

Benjamin C. Glassman
BENJAMIN C. GLASSMAN
United States Attorney
Southern District of Ohio

**SUPPLEMENTAL CIVIL COVER SHEET
FOR CASES REMOVED FROM STATE COURT**



*This form must be attached to the Civil Cover Sheet at the time
the case is filed in the United States District Court*

State Court County: <u>Franklin</u>		
Case number and caption:		
<u>17CV-01-616</u>	<u>Clifton A. Jackson, et al</u>	<u>Ohio State Highway Pat</u>
Case Number	Plaintiff(s)	Defendant(s)

Jury Demand Made in State Court: Yes No

If "Yes," by which party and on what Date:

Party	Date

Were there parties not served prior to removal?	<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/>	No
Were there parties dismissed/terminated prior to removal?	<input type="checkbox"/>	Yes	<input checked="" type="checkbox"/>	No
Were there answers filed in State Court?	<input type="checkbox"/>	Yes	<input checked="" type="checkbox"/>	No
Is there a pending TRO in State Court?	<input type="checkbox"/>	Yes	<input checked="" type="checkbox"/>	No

If you have answered "yes" to any of the above please list parties not served, the parties dismissed/terminated and the parties that filed their answers on the reverse of this page.

On the reverse of this page please list all Plaintiff(s), Defendant(s), Intervenor(s), Counterclaimant(s), Crossclaimant(s) and Third Party Claimant(s) still remaining in the case and indicate their party type. Please list the attorney(s) of record for each party named and include their bar number, firm name, correct mailing address and phone number, including area code.

Are copies of all state case pleadings attached to your removal? Yes No

If your answer is "No", when will they be filed: when they are received from the state court

List the parties that are removing the case:

<u>Defendant United States of America</u>	

Parties Not Served	Parties Dismissed	Answer Filed
<p><i>I.E. Defendant John Doe</i></p> <p>DEA Special Agent, Caitlin Szczepinski</p> <p>Paul A. Griffin, Attorney at Law</p>	<p><i>I.E. Defendant John Doe</i></p>	<p>COPY</p> <p><i>I.E. Defendant John Doe</i></p>

Party and Type	Attorney(s)
<p><i>I.E. Plaintiff John Doe</i></p> <p>Plaintiff Clifton A. Jackson</p> <p>Plaintiff Alexander Jemison</p> <p>Plaintiff Amber Powlak</p> <p>Plaintiff Mason Jackson</p>	<p><i>I.E. Attorney(s) Name</i></p> <p><i>Firm</i></p> <p><i>Address</i></p> <p><i>City, State, Zip</i></p> <p><i>Telephone and Fax Number</i></p> <p><i>Supreme Court Number</i></p> <p>#652-163 Lake Erie Correctional Institute P.O. Box 8000 Conneaut, OH 44030</p> <p>117 Weaver Street Buffalo, NY 14206</p> <p>117 Weaver Street Buffalo, NY 14206</p> <p>117 Weaver Street Buffalo, NY 14206</p>

USE A SEPARATE SHEET OF PAPER IF NECESSARY

COPY

Party	Attorney
Plaintiff Moneh Fuller	[REDACTED] Buffalo, NY [REDACTED]
Plaintiff Roman Motley	[REDACTED] Buffalo, NY [REDACTED]
Plaintiff Elijah Fuller	[REDACTED] Buffalo, NY [REDACTED]
Plaintiff Lorrionna Jackson	[REDACTED] Buffalo, NY [REDACTED]
Plaintiff April Burns	[REDACTED] [REDACTED] Detroit, MI [REDACTED]
Plaintiff Angel Burns Myles	[REDACTED] [REDACTED] Detroit, MI [REDACTED]
Plaintiff Brenda Jackson	[REDACTED] [REDACTED] Detroit, MI [REDACTED]
Plaintiff Jamel Pittman	[REDACTED] [REDACTED] Detroit, MI [REDACTED]
Defendant Ohio State Highway Patrol	1970 West Broad Street P.O. Box 182074 Columbus, OH 43218-2074
Defendant Ohio State Trooper Christopher Beyer	1970 West Broad Street P.O. Box 182074 Columbus, OH 43218-2074
Defendant Ohio State Trooper Michael Trader	1970 West Broad Street P.O. Box 182074 Columbus, OH 43218-2074

(continued)

COPY

Party

Attorney

Defendant Ohio State Trooper
K-9 Argo

1970 West Broad Street
P.O. Box 182074
Columbus, OH 43218-2074

Defendant Drug Enforcement Admin
Special Agent Geno Taliano

1375 East 9th Street
Suite 700
Cleveland, OH 44114

Defendant Drug Enforcement Admin
Special Agent Caitlin Szczepinski

1375 East 9th Street
Suite 700
Cleveland, OH 44114

Defendant Lorain County Prosecutor
Dennis P. Will

The Justice Center
225 Court Street, 3rd Floor
Elyria, OH 44035

Defendant Lorain County Asst. Prosecutor
Mary Slanczka

The Justice Center
225 Court Street, 3rd Floor
Elyria, OH 44035

Defendant Lorain County Asst. Prosecutor
Jennifer M. Riedthaler

The Justice Center
225 Court Street, 3rd Floor
Elyria, OH 44035

Defendant Lorain County Asst. Prosecutor
Peter J. Gauthier

The Justice Center
225 Court Street, 3rd Floor
Elyria, OH 44035

Defendant Lorain County Asst. Prosecutor
Laura Ann Dezort

The Justice Center
225 Court Street, 3rd Floor
Elyria, OH 44035

Defendant Jack W. Bradley, Attorney at Law

520 Broadway, 3rd Floor
Lorain, OH 44052

Defendant Mark A. Aufdenkampe,
Attorney at Law

33399 Walker Road, Suite A
Avon Lake, OH 44012

Defendant Paul A. Mancino Jr.,
Attorney at Law

75 Public Square, Suite 1016
Cleveland, OH 44113-2098

(continued)

COPY

Party

Attorney

Defendant Retired Judge Edward Zaleski

The Justice Center
225 Court Street, 7th Floor
Elyria, OH 44035

Defendant Judge John R. Miraldi

The Justice Center
225 Court Street, 7th Floor
Elyria, OH 44035

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS

Clifton A. Jackson, et al.

DEFENDANTS

Ohio State Highway Patrol, et al.

COPY

(b) County of Residence of First Listed Plaintiff Franklin
(EXCEPT IN U.S. PLAINTIFF CASES)

County of Residence of First Listed Defendant _____
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

(c) Attorneys (Firm Name, Address, and Telephone Number)
Clifton A. Jackson, pro se
Lake Erie Correctional Institution, #652-163, P.O. Box 8000
Conneaut, OH 44030

Attorneys (If Known)
Leah M. Wolfe (0093299)
Assistant United States Attorney
United States Attorney's Office for the Southern District of Ohio

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- 1 U.S. Government Plaintiff
- 2 U.S. Government Defendant
- 3 Federal Question (U.S. Government Not a Party)
- 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- | | | | | | |
|---|----------------------------|----------------------------|---|----------------------------|----------------------------|
| | PTF | DEF | | PTF | DEF |
| Citizen of This State | <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

IV. NATURE OF SUIT (Place an "X" in One Box Only)

Click here for: Nature of Suit Code Descriptions.

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES	
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice	PERSONAL INJURY <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
REAL PROPERTY	CIVIL RIGHTS	PRISONER PETITIONS			
<input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	<input checked="" type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education	<input type="checkbox"/> Habeas Corpus <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> Others <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement			

V. ORIGIN (Place an "X" in One Box Only)

- 1 Original Proceeding
- 2 Removed from State Court
- 3 Remanded from Appellate Court
- 4 Reinstated or Reopened
- 5 Transferred from Another District (specify)
- 6 Multidistrict Litigation - Transfer
- 8 Multidistrict Litigation - Direct File

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):

28 U.S.C. 2679(d)(2) and 1442

Brief description of cause:

The United States of America and federal employees are included as defendants.

VII. REQUESTED IN COMPLAINT:

CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.

DEMAND \$
58,823,529.41

CHECK YES only if demanded in complaint:
JURY DEMAND: Yes No

VIII. RELATED CASE(S) IF ANY

(See Instructions):

JUDGE

DOCKET NUMBER

DATE
02/23/2017

SIGNATURE OF ATTORNEY OF RECORD
s/Leah M. Wolfe

FOR OFFICE USE ONLY

RECEIPT # _____ AMOUNT _____ APPLYING JFP _____ JUDGE _____ MAG. JUDGE _____