

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
NORTHERN DIVISION

MICHAEL CASEY JACKSON,

Petitioner,

v.

Criminal No. 16-cr-20347

Civil No. 18-cv-10136

Judge Thomas L. Ludington

Magistrate Judge Patricia T. Morris

UNITED STATES OF AMERICA

Respondent.

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RESPONSE TO DEFENDANT’S MOTION UNDER 28 U.S.C. § 2255

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The United States of America submits that petitioner’s motion under 28 U.S.C. § 2255 be denied for the reasons stated in the accompanying brief and that a certificate of appealability should not be issued.

**BRIEF**

**Statement of Case**

A grand jury indicted defendant Michael Jackson of domestic assault by an habitual offender, in violation of 18 U.S.C. § 117. (R. 1: Indictment, 1). On June 24, 2016, a superseding information was filed and charged petitioner with unlawful imprisonment, in violation of 18 U.S.C. § 13, 1151, 1152 and M.C.L. 750.349b. (R. 14: Superseding Information, 31).

On June 24, 2016, petitioner pled guilty pursuant to a plea agreement. (R. 19: Rule 11 Plea Agreement, 40-49; R. 26: Plea Tr., 78-106). Petitioner pled guilty to one count of unlawful imprisonment. (R. 19: Rule 11 Plea Agreement at ¶ 1A, 40). On January 26, 2017, the district court sentenced petitioner to 165 months. (R. 31: Judgment, 118).

Petitioner did not appeal his conviction. On January 10, 2018, petitioner timely filed this § 2255 petition. (R. 32: Motion to Vacate Sentence under 28 U.S.C. § 2255, 124-52).

## **Argument**

### ***Ineffective Assistance of Counsel***

The United States Supreme Court set forth a two-prong test for evaluating claims of ineffective assistance of counsel in *Strickland v. Washington*, 466 U.S. 668, 104 S.Ct. 2052, 80 L.Ed.2d 674 (1984). In order to demonstrate ineffective assistance of counsel, a petitioner must show both that defense counsel's performance was deficient and that petitioner suffered prejudice as a result. *Strickland*, 466 U.S. at 687, 104 S.Ct. at 2064. In evaluating defense counsel's performance, *Strickland* admonishes lower courts: "Judicial scrutiny of counsel's performance must be highly deferential [and] a court must indulge a strong presumption that counsel's conduct falls within the wide range of reasonable professional assistance . . . ." *Strickland*, 466 U.S. at 689, 104 S.Ct. at 2065. The

Sixth Circuit has observed that a defendant “is not entitled to the most canny lawyer available, only an adequate one.” *United States v. Morrow*, 977 F.2d 222 (6th Cir. 1992)(*en banc*), *cert. denied*, 508 U.S. 975 (1993). Even if counsel’s performance is deficient, lower courts must still find prejudice to the defendant before granting relief. “A court making the prejudice inquiry must ask if the defendant has met the burden of showing that the decision reached would reasonably likely have been different absent the errors.” *Strickland*, 466 U.S. at 696, 104 S.Ct. at 2069. Jackson has failed to meet his burden of proof on either prong of the *Strickland* test.

#### ***Failure to Challenge Jurisdiction***

Jackson is claiming that his attorney was ineffective for not investigating that his crime occurred on property no longer tribally owned and/or not located on tribal property and thus not within “Indian country.” (R. 32: Motion, 139).

Jackson stipulated in his plea agreement that the assault took place in Indian Country. (R. 19: Rule 11 Plea Agreement, 41). Jackson signed the following statement contained within the plea agreement:

[D]efendant acknowledges having read (or been read) this entire document, understanding it, and agrees to its terms. Defendant also acknowledges being satisfied with defense attorney’s advice and representation. Defendant acknowledges having had a full and

complete opportunity to confer with counsel, and that all of defendant's questions have been answered by counsel.

(*Id.*, 49).

Also, at Jackson's plea hearing he testified that he went to his wife's house located on West Pickard Street in Mt. Pleasant and that this is located on the Indian Reservation. (R. 26: Plea Hearing Tr., 100-101).

Jackson even admits in his motion that the property where the crime occurred is within the exterior boundaries of Isabella Indian Reservation. (R. 32: Motion, 140-41).

"Indian country" is defined as "all lands within the limits of any Indian reservation . . . ." 18 U.S.C. § 1151. "The Isabella Reservation consists of all lands within the contiguous area comprised by the townships of Wise, Denver, Isabella, Nottawa, Deerfield, and one-half each of Chippewa and Union, as well as a smaller parcel of land located in Arenac County on the Saginaw Bay and a small parcel in Isabella County." See the Order Granting Joint Motion for "Order for Judgment" in *Saginaw Chippewa Indian Tribe of Michigan v. Jennifer Granholm, et. al.*, 2010 WL 5185114 (E.D. Mich., December 17, 2010).

The crime of conviction was committed at 1309 W. Pickard Street, Mt. Pleasant, Michigan. See Attachment A. This location is within Union Township. See Attachments B, C & D. Therefore, the crime was committed on the Isabella

Reservation in Indian country and defendant's attorney was not ineffective for not challenging the jurisdiction as defendant claims.

### **Conclusion**

Petitioner's motion under § 2255 should be denied without a certificate of appealability.

Respectfully submitted,

MATTHEW SCHNEIDER  
United States Attorney

Dated: February 12, 2018

s/ Roy R. Kranz  
Assistant United States Attorney  
101 First Street, Suite 200  
Bay City, MI 48640  
Phone: (989) 895-5712  
Roy.kranz@usdoj.gov

### **CERTIFICATION OF SERVICE**

I hereby certify that on February 12, 2018, the foregoing document was electronically filed, by an employee of the United States Attorney's Office, with the Clerk of the Court using the ECF and I hereby certify that an employee of the United States Attorney's Office mailed by United States Postal Service the document to the following non-ECF participants: Michael Jackson, Id No. 26116-039, FCI Yazoo City Medium, P.O. Box 5888, Yazoo City, MS 39194.

s/ ROY R. KRANZ  
Assistant United States Attorney

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN**

**INDEX OF EXHIBITS**

<u>Exhibit</u>	<u>Description</u>
A	Police Report of 4/27/16 incident
B	Mapquest search of 1309 W. Pickard Street
C	Map of Mt. Pleasant
D	Map of Isabella Indian Reservation

*Federal PA*

**INCIDENT/INVESTIGATION REPORT**

INCIDENT DATA

Agency Name <i>Mt Pleasant Police Department</i>		Case# <i>2016-01448</i>	
ORI <i>MI 3759900</i>		Date / Time Reported <i>04/27/2016 05:06 Wed</i>	
Location of Incident <i>1309 W Pickard St, Mt Pleasant MI 48858-</i>		Premise Type <i>Residence/home</i>	Zone/Tract <i>MPPD</i>
Last Known Secure <i>04/27/2016 05:06 Wed</i>		At Found <i>04/27/2016 05:06 Wed</i>	
#1	Crime Incident(s) <i>Assault- Nonaggravated 13001</i>	(Com)	Weapon / Tools <i>Personal Weapon</i>
			Activity <i>N</i>
#2	Crime Incident <i>Obstructing Police 48000</i>	(Com)	Weapon / Tools
			Activity
#3	Crime Incident <i>Obstructing Justice 50000</i>	(Com)	Weapon / Tools
			Activity

MO

VICTIM

# of Victims	<i>2</i>	Type:	<i>INDIVIDUAL/NOT LAW</i>	Injury:	<i>Apparent Minor Injury</i>
V1	Victim/Business Name (Last, First, Middle) <i>JACKSON, JENNIFER LYNN</i>	Victim of Crime #	<i>1</i>	DOB	<i>[REDACTED]</i>
		Race	<i>W</i>	Sex	<i>F</i>
		Relationship To Offender	<i>101</i>	Resident Status	<i>Resident</i>
	Home Address <i>[REDACTED] W PICKARD ST, Mt Pleasant, MI 48858-</i>	Home Phone	<i>[REDACTED]</i>		
	Employer Name/Address <i>NONE</i>	Business Phone	<i>[REDACTED]</i>		
VYR	Make	Model	Style	Color	Lic/Lis
					VIN

OTHERS INVOLVED

CODES: V- Victim (Denote V2, V3) O = Owner (if other than victim) R = Reporting Person (if other than victim)

Type:	<i>SOCIETY/PUBLIC</i>	Injury:	
V2	Name (Last, First, Middle) <i>STATE OF MICHIGAN</i>	Victim of Crime #	<i>2,3</i>
		DOB	<i>//</i>
		Age	
	Home Address	Home Phone	
	Employer Name/Address	Business Phone	Mobile Phone
Type:		Injury:	
	Name (Last, First, Middle)	Victim of Crime #	DOB
		Age	
	Home Address	Home Phone	
	Employer Name/Address	Business Phone	Mobile Phone

PROPERTY

1 = None 2 = Burned 3 = Counterfeit / Forged 4 = Damaged / Vandalized 5 = Recovered 6 = Seized 7 = Stolen 8 = Unknown  
("OJ" = Recovered for Other Jurisdiction)

VI #	Code	Status Firm/To	Value	OJ	QTY	Property Description	Make/Model	Serial Number
	<i>75</i>	<i>EVID</i>	<i>\$0.00</i>		<i>1</i>	<i>PORTABLE ELECTRONIC EQUIPMENT</i>	<i>TASER</i>	

Officer/ID#	<i>BALCOM, A. L. (MPPD, ROAD) (224)</i>	Supervisor	<i>BROWNE, J. R. (MPPD, CSU) (222)</i>
Invest ID#	<i>BALCOM, A. L. (MPPD, ROAD) (224)</i>	Case Disposition:	
Complainant Signature	Case Status <i>Closed By Arrest</i>		
	<i>04/27/2016</i>		

**EXHIBIT A**

Incident Report Additional Name List

Mt Pleasant Police Department

OCA: 2016-01448

Additional Name List

Page 2

NameCode/#	Name (Last, First, Middle)	Victim of Crime #	DOB	Age	Race	Sex
1) WI 1	JACKSON, [REDACTED]		[REDACTED]	[REDACTED]	I	F
	Address [REDACTED] W Pickard St, Mt Pleasant, MI 48858-		H: - -			
	Empl/Addr		B: - -			
			Mobile #: - -			
2) WI 2	JACKSON, [REDACTED]			[REDACTED]	I	M
	Address [REDACTED] W Pickard St, Mt Pleasant, MI 48858-		H: - -			
	Empl/Addr		B: - -			
			Mobile #: - -			



INCIDENT/INVESTIGATION REPORT

By: EMBREY,

04/27/2016 09:49

Mt Pleasant Police Department

Page 3

Case# 2016-01448

Status Codes 1 = None 2 = Burned 3 = Counterfeit / Forged 4 = Damaged / Vandalized 5 = Recovered 6 = Seized 7 = Stolen 8 = Unknown

IBR	Status	Quantity	Type Measure	Suspected Type	
D R U G S					

Assisting Officers  
 MURCH, C.T. (214), MOE, K.J. (220), THOMPSON, J.A. (241)

Suspect Hate / Bias Motivated: NONE

Page 3

**NARRATIVE**  
 A 41 year old Mt. Pleasant male was lodged for Domestic Assault, and violation of a Bond Condition.

## REPORTING OFFICER NARRATIVE

Mt Pleasant Police Department

Victim		OCA
JACKSON, JENNIFER LYNN		2016-01448
Offense	Date / Time Reported	
ASSAULT- NONAGGRAVATED	Wed 04/27/2016 05:06	

THE INFORMATION BELOW IS CONFIDENTIAL - FOR USE BY AUTHORIZED PERSONNEL ONLY

## INFORMATION:

On 4/27/16, at 5:06 a.m., officers were dispatched to [REDACTED] W. Pickard Street for a Bond Conditional Release violation. Officers were informed the male had just left in a blue Silverado; the caller and victim, JENNIFER JACKSON, advised Central Dispatch she had been assaulted as well.

## OBSERVATIONS ON SCENE:

Officers arrived on scene, and I, OFFICER BALCOM, observed a male slam the front door shut from the inside of the home, then a female came to the front door and opened it back up. SERGEANT MURCH and I made contact with a female, JENNIFER, and I asked her if that male was the suspect and she stated yes. She stated he just went back to shut himself in the bathroom, and he was very intoxicated, JENNIFER and her children were sitting on the couches in the living room.

## CONTACT WITH SUSPECT MICHAEL CASEY JACKSON:

Officers attempted to make contact with MICHAEL through the door of the bathroom; asking him to open the door and come out. MICHAEL refused to open the door, stating he did not want to go to jail, continuing to say, "Hold on a minute." MICHAEL was advised officers would not be leaving and he had to go to jail. He was also advised if he did not open the door the door would be kicked in. MICHAEL continued to refuse to come out. OFFICER MOE arrived on scene and went to the outside of the residence to the window of the bathroom, and SERGEANT MURCH began to kick in the door of the bathroom. At that point, MICHAEL put his weight against the door in an attempt to keep officers out. OFFICER MOE then came around to the inside of the house, and he and SERGEANT MURCH continued to shove against the door to obtain entry. Officers were still not able to get in, only able to get the door open a few inches. OFFICER MOE was able to put his hand in through the door and pepper spray MICHAEL; MICHAEL continued to try and shut officers out of the bathroom. Officers were able to push the door open further even though MICHAEL was wedged between the door and the tub. MICHAEL had his right hand down the toilet and refused to pull his hand out of it. OFFICER MOE could see something shiny in his hand but could not make out what it was. MICHAEL refused to follow orders given by officers of, please put your hands behind your back, and to take your hand out of the toilet.

During that time, OFFICER MOE deployed the Taser and MICHAEL would still not comply after the first deployment. MICHAEL was Tasered three more times with opportunities in between each time to comply with officer's requests to put his hands behind his back. Officers were finally able to get his hand out of the toilet and he was placed into custody. MICHAEL was walked out to the vehicle and transported to the Isabella County Jail.

## CONTACT WITH VICTIM JENNIFER JACKSON:

Prior to officers kicking in the door, I requested JENNIFER take her children and herself into a side room so that they would not see what was going on. I then spoke with JENNIFER and asked her what had happened. She stated her and her children were sleeping, and she heard pounding on the front door. She went out and

## REPORTING OFFICER NARRATIVE

Mt Pleasant Police Department

Victim JACKSON, JENNIFER LYNN		Offense ASSAULT- NONAGGRAVATED	OCA 2016-01448
			Date / Time Reported Wed 04/27/2016 05:06

THE INFORMATION BELOW IS CONFIDENTIAL - FOR USE BY AUTHORIZED PERSONNEL ONLY

saw it was MICHAEL; she told him to go away and he refused, continuing to pound on the door. JENNIFER opened the door a little bit to tell him to go away, that the kids were sleeping, and he began to push his way into the house. She stated that MICHAEL started to say that she does not love him and she was going to pay for it. He continued to push her back near the bathroom area, then into the bathroom, and shove her down into the tub. JENNIFER got out and was trying to get out of the bathroom door but he would not let her. He was kicking at her, and JENNIFER obtained an injury to the back left side of her leg when falling into the tub, but was also kicked in the left arm, and left side of her face. I asked JENNIFER if this happened when she was in the tub and she stated no, it was when she was trying to open the door and he continued to kick at her. JENNIFER then went through the bathroom window to escape the bathroom. JENNIFER stated she ran to the house to the east and knocked on the door but nobody came to the door. She had seen MICHAEL leave the residence and that is when she ran back into her own residence to call 911. A short time after she got off the phone with 911, MICHAEL came back into the residence. When I was speaking with JENNIFER, both of her children; [REDACTED] and [REDACTED], continued to tell me their dad shoved their mom out of the bathroom window.

## INJURIES:

JENNIFER obtained scratch and red mark to the left side of her leg, red markings on the left side of her face, left arm and her upper back.

## CRIME VICTIM'S RIGHTS:

JENNIFER was given her Crime Victim's Rights information and explained the services she could be helped with.

## DOMESTIC PROBATION CONDITION VIOLATION:

The date on the warrant for this is 7/29/14, and expires on 7/29/16, Court Docket number 2014-11753PP, out of the 21st Circuit Court. A complaint of violation of Order for Conditional Release has been filed and is attached to this report. This condition is for MICHAEL JACKSON to have no contact with JENNIFER JACKSON.

## RELATIONSHIP:

MICHAEL and JENNIFER are married but separated, and have two children in common; [REDACTED] and [REDACTED] JACKSON.

## ADDITIONAL INFORMATION:

OFFICER MOE went back in to check on what had been shoved down into the toilet and it was a crack pipe. It appeared that MICHAEL was smoking crack while officers were attempting to gain entry into the bathroom.

REPORTING OFFICER NARRATIVE

*Mt Pleasant Police Department*

OCA
2016-01448
Date / Time Reported
Wed 04/27/2016 05:06

Victim	Offense
JACKSON, JENNIFER LYNN	ASSAULT- NONAGGRAVATED

THE INFORMATION BELOW IS CONFIDENTIAL - FOR USE BY AUTHORIZED PERSONNEL ONLY

PHOTOGRAPHS:

Photographs of JENNIFER'S injuries as well as the damage to her residence have been attached.

USE OF FORCE FORM:

Please see OFFICER MOE'S supplemental report.

STATUS:

Status is closed, turned over to Tribal Court, and Federal Court. A copy will also be forwarded to Anishnaabeg Child and Family Services (ACFS).

INVESTIGATED BY: Sergeant Murch, Officers Balcom, Moe

DICTATED BY: Officer Balcom, 4/27/16, 6:45 a.m.

TYPED BY: Sweet, 4/27/16, 8:21 a.m.

Incident Report Suspect List

Mt Pleasant Police Department

OCA: 2016-01448

1 Name (Last, First, Middle) <i>JACKSON, MICHAEL CASEY</i>		Also Known As			Home Address <i>AIRWAY DR MT PLEASANT, MI 48858-1098 8915</i>					
Business Address <i>UNEMPLOYED</i>										
DOB. <i>[REDACTED]</i>	Age <i>[REDACTED]</i>	Race <i>I</i>	Sex <i>M</i>	Eth	Hgt <i>508</i>	Wgt <i>174</i>	Hair <i>BLK</i>	Eye <i>BRO</i>	Skin <i>MED</i>	Driver's License / State. <i>[REDACTED] MI</i>
Scars, Marks, Tattoos, or other distinguishing features <i>SCAR LEFT EYE BROW; SCAR LOWR ABDOMEN / APPENDIX SCAR; SCAR LFOR ARM / ABOVE FOREARM, BURNS; TATT LFOR ARM / "ANISHABE"; TATT LEFT HAND / CROWN; TATT LEFT ARM / BAND WITH FEATHERS; SCAR LEFT</i>										
Reported Suspect Detail		Suspect Age		Race	Sex	Eth	Height	Weight	SSN	
Weapon, Type	Feature	Make		Model		Color	Caliber	Dir of Travel		Mode of Travel
VehYr/Make/Model		Drs	Style		Color	Lic/St		VIN		

Notes

Physical Char

*Hands, RIGHT HANDED  
Build, MEDIUM*

Incident Report Related Property List

Mt Pleasant Police Department

OCA: 2016-01448

1	Property Description <i>PORTABLE ELECTRONIC EQUIPMENT</i>	Make <i>TASER</i>	Model	Caliber
	Color	Serial No.	Value <i>\$0.00</i>	Qty <i>1.000</i>
	Status <i>Evidence</i>	Date <i>04/27/2016</i>	NIC #	State #
	Name (Last, First, Middle) <i>* No name *</i>	DOB	Age	Race
			Local #	Jurisdiction <i>Locally</i>
				OAN
				Sex

Notes

*taser cartrige/wires/doors/prongs*

## CASE SUPPLEMENTAL REPORT

Printed: 04/27/2016 09:49

Mt Pleasant Police Department

OCA: 201601448

THE INFORMATION BELOW IS CONFIDENTIAL - FOR USE BY AUTHORIZED PERSONNEL ONLY

Case Status: CLOSED BY ARREST

Case Mng Status: NA

Occurred: 04/27/2016

Offense: ASSAULT- NONAGGRAVATED

Investigator: MOE, K. J. (220)

Date / Time: 04/27/2016 06:18:47, Wednesday

Supervisor: BROWNE, J. R. (222)

Supervisor Review Date / Time: 04/27/2016 09:20:05, Wednesday

Contact: Jackson, Michael Casey  
[REDACTED] Airway Dr, Mt Pleasant  
[REDACTED]

Reference: Supplement

## INFORMATION:

On 04/27/2016, at approximately 5:06 a.m., officers were summoned to [REDACTED] W. Pickard Street in the City of Mt. Pleasant. Isabella County Central Dispatch advised that they had a female on line who stated that her estranged ex had broken into the house and assaulted her. OFFICER BALCOM and SGT. MURCH arrived on scene and the male subject was still within the house. I (OFFICER MOE) responded to the scene.

## ON SCENE ARRIVAL:

I was directed by OFFICER BALCOM to stand outside the bathroom window, as the male subject known as MICHAEL CASEY JACKSON had shut and locked himself in the bathroom. While standing outside of the bathroom, I saw MICHAEL lighting a lighter over and over. Thinking that he was possibly attempting to set the bathroom on fire, I re-located myself to the residence. Prior to entering the residence, I noticed that MICHAEL had sat on the floor of the bathroom and leaned his back against the bathroom door with his feet against the tub.

## ARRIVAL INSIDE THE RESIDENCE:

I located the bathroom, at which time SGT. MURCH was attempting to gain entry into the bathroom by using his body as weight to push against MICHAEL'S. However, MICHAEL kept pushing the door shut. SGT. MURCH and I again tried to push the door open, with little to no effect. At one point, the door was opened approximately one foot. I removed the pepper spray from my duty belt and gave two short two second bursts into an area where I thought MICHAEL'S face and head would be. At this time, there was no immediate compliance from MICHAEL.

Officers attempted to gain further entry by punching holes in the door to try to get to MICHAEL. Eventually, MICHAEL moved from the door and with a shiny object in his right hand, took it and shoved his hand down inside the toilet into the hole where the water flushes when used.

At this time, SGT. MURCH and I entered the bathroom and tried to get compliance and affect the arrest through physical tactics, using arms to take MICHAEL'S to the center of his back. However, MICHAEL refused to give up his right hand that he had shoved down into the hole of the toilet. I could see from my angle that he was holding onto a silver object; however, I could not get a clear view of what it was as the water was moving back and forth.

MICHAEL was told numerous times to give his hand up; however, he refused to do so. At this time, I informed SGT.

Investigator Signature

Supervisor Signature

## CASE SUPPLEMENTAL REPORT

Printed: 04/27/2016 09:49

Mt Pleasant Police Department

OCA: 201601448

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Case Status: *CLOSED BY ARREST*Case Mng Status: *NA*Occurred: *04/27/2016*Offense: *ASSAULT- NONAGGRAVATED*Investigator: *MOE, K. J. (220)*Date / Time: *04/27/2016 06:18:47, Wednesday*Supervisor: *BROWNE, J. R. (222)*Supervisor Review Date / Time: *04/27/2016 09:20:05, Wednesday*Contact: *Jackson, Michael Casey*  
[REDACTED] *Airway Dr, Mt Pleasant*  
[REDACTED]Reference: *Supplement*

MURCH that was going to Taser the subject. SGT. MURCH re-positioned his body away from MICHAEL'S back. From approximately two feet away, I deployed my Taser into the center of MICHAEL'S back. The first probe hit the center area near the spine. The second probe hit the right upper shoulder blade area.

After one approximately five second deployment, MICHAEL was told to release his hand. He did not. A second five second deployment was triggered and MICHAEL again refused to move his hand. A third and fourth, each were five second deployments, were deployed. After that, I was able to remove MICHAEL'S hand from the toilet.

While removing his hand from the toilet, MICHAEL released his hand from the silver object. Once handcuffs were placed on MICHAEL, I removed the object from the toilet and found that it was a crack pipe.

MICHAEL JACKSON was transported by walking himself to OFFICER BALCOM'S patrol car. Once at OFFICER BALCOM'S car, he was then transported to my car and eventually I transported MICHAEL to the Isabella County Jail.

Once at the Isabella County Jail, MICHAEL refused to cooperate with corrections staff. He had to be physically taken to a cell and cuffed to a wall to prevent him from assaulting any staff.

**INJURIES:**

MICHAEL JACKSON had a scraped knee and two small holes in his back from the Taser; one in the center of his back and the other in the upper right shoulder blade area. MICHAEL had no other visible injuries nor did he complain out loud of any injuries except for the fact that his face was burning because of the pepper spray.

The officers did not receive any injuries.

**TREATMENT OF INJURIES:**

MICHAEL was given access to the sink in his cell, where he vigorously washed his face to clear himself of the contaminate chemical agent.

**REMOVAL OF TASER PROBES:**

Investigator Signature

Supervisor Signature



CASE SUPPLEMENTAL REPORT

Printed: 04/27/2016 09:49

Mt Pleasant Police Department

OCA: 201601448

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Case Status: CLOSED BY ARREST

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Supervisor: BROWNE, J. R. (222)

Supervisor Review Date / Time: 04/27/2016 09:20:05, Wednesday

Contact: Jackson, Michael Casey  
18 Arway Dr, Mt Pleasant

Reference: Supplement

I took the Taser probes and placed them in between my pointer finger and thumb and removed both probes from MICHAEL'S back.

EVIDENCE:

I collected the Taser wire, the Taser prongs, the Taser cartridge, the blast doors, and one piece of confetti. These items, along with the Taser itself, were placed in CAPTAIN LAURIA'S office mailbox for a download.

PICTURES:

I took three pictures of MICHAEL JACKSON. One picture is of his knee, one is of his face, and one is where the Taser prongs entered his back.

There is also a picture of all of the above mentioned evidence involving the Taser.

RESIDENTIAL DAMAGE:

It should be noted that the door to the bathroom had two holes in it and appeared to be off of one of the hinges. That is the only obvious damage that occurred during the arrest of MICHAEL JACKSON.

STATUS:

Closed. Turned over to original report.

OFFICERS INVOLVED: Officer Moe and Sgt. Murch

DICTATED BY: Officer Kipp Moe, 04/27/2016, 7:00 a.m.

TYPED BY: Embrey, 04/27/2016

Investigator Signature

Supervisor Signature

**Supplements - Case #: 2016-01448 : Supplement**

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**INFORMATION:**

On 05/02/2016, JENNIFER JACKSON came into the Mt. Pleasant Police Department for additional photographs of her injuries, from the original incident.

**CONTACT WITH JENNIFER JACKSON:**

JENNIFER stated she has some bruising on her left leg from the incident, as well as being sore from it.

**PHOTOGRAPHS:**

Photographs of JENNIFER'S leg were taken. The pictures will be attached with the original report.

**STATUS:**

CLOSED TOT COPY TO TRIBAL PROSECUTOR AND FEDERAL PROSECUTOR.

**TYPED BY:**

BROWNE

Mapquest

Sign up Log in

Back Share Print

Find a place, category, or address  
1309 W Pickard St, Mount Plea

Find Places

Search Results

1309 W Pickard St  
1309 W Pickard St,  
Mount Pleasant, MI 48858

Find a hotel & save!

Sponsored Topics

Mount Pleasant Hotels  
Mount Pleasant Restaurants

NEW YEAR NEW EMPIRE SALE ROOMS FROM \$29 BOOK NOW



EXHIBIT B

AdChoices

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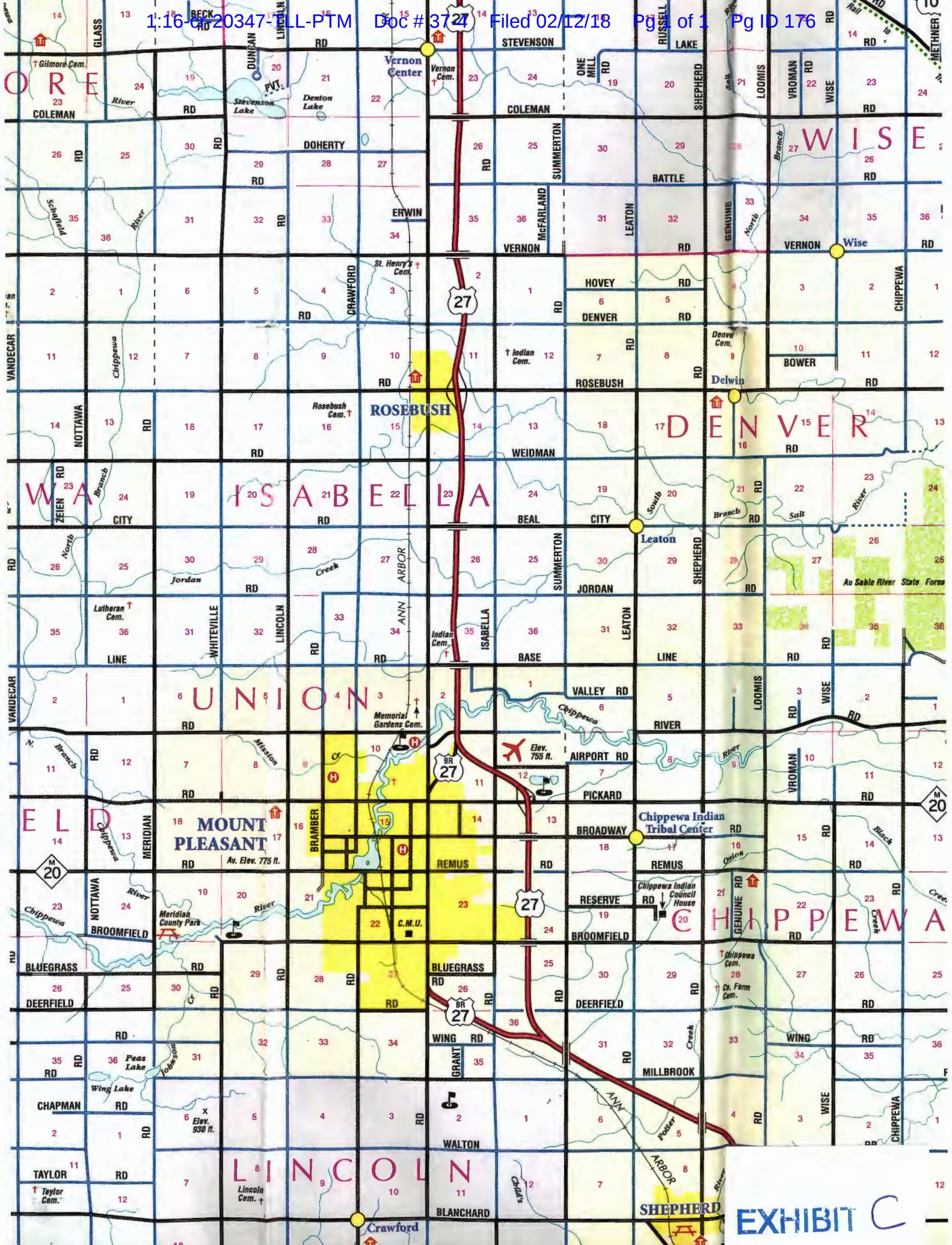


EXHIBIT C

