Kevin Jackson #97-A-4169
Green Haven Corr. Facility
594 Route 216
Stormville, NY 12582-4000

Re: Factual Innocence to 2 Murder Cases

To whom it may concern,

Please find enclosed/attached a synopsis of 2 different murder cases that I am wrongfully convicted and factually innocent of.

I am seeking an attorney who will take 'special interest' in both cases for which I had one trial. I am also seeking outside support. I believe public attention is required based upon the gravity of my claims and whoever wholeheartedly believes in my innocence after reviewing and considering what I most recently discovered about each case and during my nearly 30 years of being wrongfully imprisoned.

Once you read the two summaries, I believe that only one question needs to be answered. And that is, are you interested in such a just cause in which you need or want proof to support what I am professing here before committing yourself, or are you not interested in such a cause based upon what you read thus far and need no more information for any further consideration to my quest to correct these injustices to humanity.

Quite naturally, I am seeking my first liberty here. However, I am also pursuing justice for the victims and their loved ones in each case and the 'community at large' as well. The criminal enterprise that I am looking to prove framed me decades ago also targeted only certain urban communities to commit these atrocious crimes, which may still exist today.

I appreciate your time, attention, and consideration of this matter. I hope to hear from you soon.

Thank you.
Respectfully submitted,

KEVIN JACKSON #97-A-4169

**"White-Cops-Killing-Blacks-For-Organs" Scheme EXPOSED**

1. The central issue that lies in BOTH murder cases against Kevin Jackson for the shooting deaths of Richard Harrison AND Earl Hicks is the altering of the time of place AND death in the Richard Harrison case AND the altering of the time of death in the Earl Hicks case by the prosecution, as the TRUE timelines of BOTH cases were concealed from Kevin AND the jury, which caused two wrongful murder convictions.

2. To begin, Richard Harrison ("RH") always had and remains until this day with an excellent "Standing" as a member of Kevin's nonprofit organization ("Queens Community") as he was placed on local construction sites by Queens Community (mainly, job sites located within JFK Airport) and remained with a particular contractor (Grace Const.) paying him union scale for many years at one time.

3. More importantly, now deceased, Kevin will continue to advocate for RH, Earl Hicks ("EH") and others in becoming their VOICE in bringing justice to the TRUE perpetrators who committed a slew of atrocious crimes against them and society at large.

4. That said, new "reliable" evidence shows that on 11.1.89, RH was shot and killed at "958am". According to the trial record, RH was then "found dead" shortly thereafter by a passerby nurse. Sometime later, RH's body was taken to Jamaica Hospital Medical Center ("JHMC") in which an illegal harvesting procedure was performed to surgically remove his organs.

5. This would make a fifth scenario that was NOT heard by the grand jury nor trial jury.

6. In other words, besides the "found dead" scenario, there are three fictitious hospital scenarios between the time RH was shot twice and his place AND time of death ("T.O.D.") as stated at JHMC. Each scenario contradicts the other. ALL four scenarios were introduced into evidence by the prosecution during Kevin's criminal proceedings BEFORE this fifth version of events surfaced and was revealed in May 2008.

7. The prosecution FIRST introduced into evidence during grand jury proceedings in April 1995 that RH was "found" Dead-at-the-Scene ("D.A.S.") through the testimony of the first-officer-on-the-scene. The same police officer also testified that RH's "body" was in the "same condition" the next day at the morgue as he found him at the scene, which such a claim constituted that RH's "body" was NOT "tampered with" between the crime scene and he identifying RH at the morgue.

8. Immediately thereafter, the prosecution introduced documentary evidence from the Medical Examiner's Office (RH's death certificate dated 11.2.89) that he was shot twice at "958am", once in the head (left temple area) and once in the left shoulder. This would of course would be in stark contrast to RH being "found" D.A.S., therefore making this the second scenario.

9. The major difference here, however, is that the time of occurrence and type of injury as stated in RH's death certificate is a "9:58 am Assault" (NOT "death") and his place of death is stated as occurring in the Emergency Room of JHMC at "11:40 am" (NOT at the crime scene).

10. The fifth "958am" D.A.S. scenario that was concealed from Kevin is just as important as when RH was "found" dead according to this SAME police officer who testified in the grand jury because two years later at trial he testified that he and his partner were BOTH on the scene FIRST at this UNDISCLOSED critical time (NOT Kevin).

11. Between the grand jury and trial, there were several assault-turned-hospital death scenarios, which consisted of 2 different times for the assault, and 3 different times for the hospital death. However, the grand jury indicted Kevin upon the D.A.S theory (no time given) AND a second theory, the "9:58 am Assault" turned "1140am" hospital death scenarios.

12. Despite the fact that there are TWO different theories that Kevin's indictment is predicated upon, at minimum, the trial evidence must conform to the controlling theory.

13. Here, the "9:58 am Assault" that allegedly forged a direct LINK to Kevin at this precise time as the accused who brought about RH's "1140am" hospital death is CONTROLLING since this was utilized by the Queens District Attorney's Office ("QDAO") to establish an essential element - RH's "cause of death."

14. Contrary to this controlling theory here, months later, the prosecuting attorney alleged in the Bill of Particulars that Kevin "shot and killed" RH at "approximately 955am", despite KNOWING and PRESENTING in the grand jury the "precise" time of when RH was shot twice and his "1140am" hospital death.

15. Between the combination of the "958am Assault", the "found" D.A.S. testimony of the police in the grand jury and now the "shot and kill" theory as the prosecuting attorney AFFIRMED in the Bill of Particulars, who would have knew back then in July 1995 (three months after Kevin's illegal arrest) that such a combination that included a contradictory "causal connection" between the shooting and RH's hospital death would equal to Kevin's recent discovery that his "death" actually occurred at "958am"? Surely, NOT Kevin.

16. So why was RH's IMPOSSIBLE death STAGED at the hospital between the moment he was killed and the following day by so many culprits according to his 11.2.89 death certificate? The answer is described-below.

17. According to a police informant who testified in the grand jury that five-plus years earlier, days after the RH killing, Kevin told him he killed RH at a different time ("at night") and location (inside of a park blocks away from where the actually murder occurred).

18. As an observation here, this particularly time and place of death scenario for RH - despite the fact that the prosecution is presenting it - is NOT being counted as one of the four contradictory scenarios that were illegally placed on record by the State since the informant is claiming Kevin SAID this false material contradiction to a physical fact.

19. The bottom line, the prosecution at TRIAL, unbeknown to Kevin and the jury, altered the D.A.S. and "9:58am Assault" theory that Kevin was indicted upon by:

a) concealing the "958am Assault" CONTROLLING theory; and

b) substituting it with a "new found" "9:52am" eyewitness assault turned "1240pm" AND "140pm" hospital death case.

20. To add insult to injury, a "found dead at about 10am" by a "passerby nurse" scenario was included, which is MORE detailed than grand jury's D.A.S. theory.

21. The hospital's version of events presented at trial (π19 subdiv. (b) ) will now make this the third and fourth scenarios introduced into evidence on the prosecution's case-in chief. To be sure, between Kevin's indictment and trial, the prosecution remained consistent, for the most part, w/the "found dead" scenario.

22. The prosecution's key evidence against Kevin at trial, based upon the "new found" altered scenario came from David Harrison ("DH"), the victim's brother. DH testified that a few months earlier, the prosecuting attorney called him to their office. This is when, for the FIRST time since his brother was killed seven years earlier, DH and the prosecution agreed that DH will testify at Kevin's trial that his next-door neighbor and brother's best friend for 20+ years witnessed Kevin kill his brother.

23. In other words, DH never mentioned this incriminating claim against Kevin to law enforcement or anyone else for that matter until trial. Nor did the best friend ever mentioned it to anyone and DID NOT testify at trial, although AVAILABLE to both parties.

24. Simply put, DH's testimony was fabricated from its inception and based upon classic rank hearsay.

25. Here, DH's testimony contradicted his own testimony and five OTHER "on-the-record" sources:

a) the victim's "best friend" and so-call eyewitness who, a year earlier, made sworn statements during a pre-trial deposition by the prosecution about this material issue;

b) police testified that he and his partner was FIRST on the scene (LITERALLY) at "958am", thus both being present at the time RH was shot dead (as Kevin was clearly NOT);

c-d) the defense attorney as an officer-of-the court AND the prosecuting attorney as a public officer BOTH took the same stance as to this material issue; and

e) a federal Court's examination of the trial record, included such a material fact.

26. ALL FIVE independent sources from the record, in addition to the victim's brother here, ALL CONFIRMED that RH was "found dead" by the "passerby nurse" at "about 10am" BEFORE DH and the victim's next-door neighbor and brother's best friend for 20+ years came outside from inside their homes.

27. Of course, such a proven fact (i.e., the "found dead" scenario) occurred AFTER the first-officer-on-the-scene and his partner arrived on the scene at the time RH was shot dead ("958am") AND immediately departed.

28. Indeed, the "found dead" scenario of RH, as just illustrated, automatically ELIMINATES the three DIFFERENT assault-turned-hospital-death scenarios.

29. Such a reliable "found dead" by the "passerby nurse" scenario, especially CONFIRMED by a federal Court which its' findings derives from the trial record (and as stated-above, TWO officers of the Court, the prosecution's OWN witnesses including the so-called eyewitness himself during the February 1996 pre-trial deposition, the NYPD and the VICTIM's BROTHER, DH) also ELIMINATES any and all eyewitness evidence that the prosecutor suddenly and surprisedly presented such an essential element to the case that consisted of a fabricated "chain of causation" for the FIRST time in the middle of trial.

30. Such manufactured evidence included PHYSICAL evidence (specifically, medical records generated by JHMC and a doctored 911 tape).

31. Whether it was a "9:58am" shooting as Kevin was indicted upon or RH was shot at "9:52am" (according to the police and DH's D.A.S. trial testimonies) in which the "9:58am" grand jury scenario was concealed and suddenly replaced (w/out notice), the $$$Million Dollar Question that lies here is:

After RH was assaulted at "958am" (see grand jury evidence) OR shot dead at "9:52am" (see trial evidence), what actually occurred w/the "chain of evidence" (that is, RH's "body") between the Nurse finding him at "about 10am" and his three FALSE hospital times of death at JHMC OR when the Medical Examiner's Office finally took possession of the CORPUS DELICTI?

32. This vital question needs to be answered in which Kevin, who has a "liberty interest" here, is not only entitled to know but RH's love ones and the Public also has the right to know as well; especially since the question relates to a "chain" of events that happened in the public domain as well as viewed in an open courtroom, therefore constituting it as public information.

33. Moreover, the answer to such a question relates directly to whether such evidence was "tampered with" or NOT, which must be satisfied by the State in any homicide case (i.e., the "causation" and "chain of evidence" pertaining to an essential element).

34. Conspicuously, each time of death recorded in the hospital for RH are exactly a hour apart from one another (specifically, "11:40am", "12:40pm" AND "140pm").

35. The altered "12:40pm" and "1:40pm" times of death scenarios was actually placed into evidence at trial by the prosecution, which is the CAUSAL CONNECTION to this "new found" eyewitness "9:52am" assault, which clearly incriminates Kevin as RH's shooter, which brought about these TWO IMPOSSIBLE hospital deaths. Once again, an essential element - RH's "cause of death."

36. Such a bogus scenario coupled w/the "found dead at about 10am" contradictory scenario was DESIGNED to surprise and prejudice Kevin, which includes confusing and misleading the jury from their truth-seeking function (to date, an unanimous verdict remains unknown), which ultimately caused NOT one but two wrongful convictions against an innocent man.

37. During the SINGLE trial of both murders, even though each homicide occurred two years apart, the prosecuting attorney introduced into evidence RH alleged medical records, which we NOW know was manufactured by the NYPD, EMS, JHMC, Medical Examiner and QDAO.

38. Such medical records indicated that doctors and nurses made it APPEAR as if they immediately performed OPEN-HEART surgery on RH in the Emergency Room at "1020am" - in spite of the fact that EMTs recorded within their Ambulance Call Report that he had NO vitals between "10am" and "1020am" due to a gun shot wound to his "left temple."

39. It is universal as any layperson may know, absent having a doctorate degree in medicine, that doctors and nurses would NOT place ALL their undivided attention in the Emergency Room to perform OPEN-HEART surgery to a patient who just came off the street with a gun shot wound to his "left temple" and give NO attention at ALL to the head injury of this magnitude to a patient in which the bullet had landed in the brain.

40. But we NOW are also aware that such an unorthodox procedure was NOT performed on RH since he was "found dead" at the crime scene as stated-above (Emphasis added).

41. The main purpose of making it APPEAR that RH had OPEN-HEART surgery in the FIRST place was to justify why these fresh "surgery incisions" was on the chest area right where the heart lies underneath when his body was first examined, photographed and recorded by the Medical Examiner BEFORE they performed their autopsy on RH (see Autopsy Report, "Preliminary Examination" of RH).

42. However, once the autopsy was commenced on RH by the County Coroner, one cannot staged a corpse with a MISSING heart, UNLESS the Medical Examiner's Office are also part of such an elaborate convoluted scheme.

43. Falsifying the medical records was also needed to justify WHY police and EMTs BOTH colluded to remove the "body" of RH from the crime scene where he was "found dead" by the passerby nurse - whether "at about 10am" OR, upon information and belief, an hour later - AND then taken to JHMC where the illegal harvesting of RH's heart were performed by doctors and nurses.

44. Here, the ONLY scenario introduced into evidence at the grand jury that came directly from the Medical Examiner's Office was RH's death certificate dated 11.2.89 for the purpose of establishing RH's "cause of death" (AND manner, illegally), which, in this case, also entailed the "chain of causation".

45. Therefore, since Kevin was indicted upon this premise that he shot RH at "9:58am", as stated-above, the State was bound by such evidence that they AND the grand jury adopted, which is CONTROLLING to each and every element of the charged crime - Murder in the Second Degree (i.e., "guilty intent", "guilty act" And "cause of death") - and thus, MUST be followed at trial.

46. This is WHY the "new" evidence that was discovered within a May 2008 decision by the New York County Supreme Court when it judicial noticed the "9:58am" scenario as RH's T.O.D. now makes so much sense.

47. Furthermore, this same May 2008 judicial notice of evidence was adopted by JHMC in September 2014 within a civil action Kevin had filed against them for FRAUD. The Clinton County Supreme Court in October 2015 did the same and the Appellate Division as well when it sustained the lower Court decision and order in January 2018. MORE "newly discovered evidence."

48. Also discovered as "new" evidence in December 2014 was an admission made by letter from the Medical Examiner's Office to the Clinton County Supreme Court that the "958am" scenario that allegedly LINK Kevin to the RH murder during grand jury proceedings came DIRECTLY from the "NYPD", which, once again the M.E.'s Office, QDAO and grand jury ALL adopted.

49. Surely, out of the FIVE different contradictory scenarios demonstrated here, FOUR of them as stated-above, which includes "found dead" scenario, was introduced into evidence against Kevin between the grand jury and trial by the prosecution' OWN evidence.

50. This is just another unorthodox feature, standing alone, that makes Kevin's improperly joined murder cases so UNIQUE from any other trialone may have encountered.

51. At least, FOUR of the FIVE scenarios are based upon fabricated evidence, which ultimately cost and caused Kevin, not only two wrongful murder convictions but worse, two illegal arrests.

52. These multitude of scenarios that was deliberately placed "on the record" during Kevin's criminal proceedings once he was illegally arrested five-plus years after RH was killed, ALONE, will clearly show that the NYPD, QDAO and others have a total disregard for the "truth-seeking" process.

53. Such a complete disregard began immediately BEFORE, DURING and AFTER these crimes was committed against RH (and EH) and continued years later from the BEGINNING, DURING and END of Kevin's prosecution, NOW includes his appeal process.

54. In reality, RH was killed at the precise time of "958am" by Police and others acting-in-concert w/them for his organs - specifically, RH's heart - when Kevin could not AND was not on the scene on the day in question according to the grand jury's findings of fact pertaining to when this incident occurred AND the trial testimony of the NYPD and QDAO's own evidence (specifically, the Medical Examiner's fact finding AND first-officer-on-the-scene, respectively).

55. In fact, the POLICE's trial testimony - coupled w/the May 2008 "newly discovered evidence" of RH's death certificate that the jury did NOT hear - not only implicates the Police as the shooters, especially since he perjured himself about the fictitious radio call him and partner received minutes BEFORE arriving on the scene at "958am" but more importantly, it also EXONERATES Kevin since he (and his partner) NOW becomes Kevin's alibi witnesses (Emphasis added).

56. In sum, the SUPPRESSION of the the two scenarios of "958am" (whether RH was assaulted or shot dead at such time) was deliberately done by the State for a HOST of reasons in which the "chain of evidence" that followed either scenario remains UNDISCLOSED to this day because:

a) it would further INCRIMINATE the Police as the actual shooters of RH since they are on the scene at such time - w/out just cause - and then years later gave PERJURED testimony against Kevin, which was subornated by the prosecution when they failed to correct the Police Officer's testimony (among so much other false testimonies he gave in the grand jury and trial) - Namely, about the radio call he claimed to have received from his dispatcher minutes EARLIER that justified him and his partner's reason for being there, which the prosecutor and police BOTH intentionally omitted concerning the immediate departure and chain of events that followed;

b) it is in stark contrast to the alleged "952am" (and "954am") eyewitness evidence identifying Kevin as RH's shooter as well as the CAUSAL CONNECTION to RH's two IMPOSSIBLE "1240pm" AND "140pm" times of death at the hospital, which we NOW know was falsified by the NYPD, EMS, JHMC, QDAO and others;

c) it also supports that the prosecutor's failure to correct DH's false testimony at trial about his claim that ONLY seconds elapsed between him hearing shots fired from outside his home at "952am" AND he immediately looked out his window, saw his next-door neighbor running around frantic yelling "Kevin Jackson" twice as his brother's shooter AND he then witnessed him run in the house (which DH and the prosecution then claimed the alleged eyewitness called 911 yelling to the Operator "Kevin Jackson" two more times as RH's shooter and that he just saw his car flee the scene);

d) it further supports Kevin's position to counsel throughout trial - from the moment when he heard for the FIRST time seven-plus years AFTER the RH killing about this "new found" "952am" eyewitness evidence (in regards to the victim's brother DH on the stand lying AND that the 911 tape made at "954am" was "doctored" - ONLY because Kevin knew he was never at the crime scene for ANYONE to be identifying him by his first and last name on multiple occasions as RH's shooter and leaving the scene; and

e) it clearly EXONERATES Kevin as RH's shooter based SOLELY upon the NYPD and QDAO's own evidence at the grand jury, trial AND "newly obtained" third-party-guilty evidence in which both entities suppressed in which so much MORE is still being fraudulently concealed by them AND others.

57. Kevin would be remiss here if he failed to observe the fact that trial counsel's failure to show that the eyewitness evidence was fabricated during the Hearing that was conducted in the middle of trial, which ultimately cost Kevin his liberty. And, if need be, expose such false evidence at trial w/the prosecution's OWN evidence from a multitude of sources as described-above in which RH was "found dead" by the "passerby nurse" as CONFIRMED by the MOST IMPORTANT witness in the case - the so-called eyewitness' OWN sworn statements that he made TWICE during the prosecution's pre-trial deposition of him.

58. And counsel's failure to retain a forensic pathologist expert to explore AND expose the State's different MISLEADING times and places of death for RH as shown above, which also includes counsel's failure to retain a forensic tape expert to analyzed and SANCTION that the "954am" recorded 911 call was in fact "doctored", which such a failure can not be considered as strategy since he stated on the record:

a) WELL BEFORE trial and BEFORE Kevin heard the contents of the tapes in the middle of trial that he needs the tapes so he can send them to an expert to be tested so we can see whether they were splice or not; and

b) shortly after the guilty verdicts was rendered, why Kevin relieved him (before sentencing) over this SAME ONGOING dispute they had between themselves throughout the trial about the 911 tape being "doctored".

59. This vital issue became even MORE disturbing to Kevin once the jury was "deadlock" after deliberating for several days and thereafter requesting to listen to the 911 tape AGAIN, as both parties agreed w/the Court' s approval, which permitted them to listen to this manufactured piece of evidence countless times in the jury room while they continued to deliberate.

60. Absent the newly obtained evidence that clearly INCRIMINATES the police w/the RH murder at "958am", the multitude of CONFLICTING scenarios that the State deliberately advanced during their prosecution of Kevin shows as if he has been fighting for decades against FOUR different murder cases to this ONE killing that the State KNOW exactly which scenario is the truth of the matter here; especially since it is universal AND the law that makes it clear, "Man dies but once."

61. Therefore, one must beg the following question: Which SCENARIO to the RH murder did the jury unanimously find Kevin guilty? Put another way, which SCENARIO is Kevin's conviction, as of today, actually hinged upon?

62. It is crystal clear here that the State actors placed these FOUR DIFFERENT CONTRADICTORY SCENARIOS on the record during Kevin's criminal proceedings between his illegal arrest AND wrongful conviction to the RH murder ONLY as a COVERUP to the Police ILLEGALITIES of committing such a killing AND the FRUITS that FOLLOWED their crimes and misconduct, which includes a HOST of OTHER participates.

63. Absent the "958am" death of RH AND the defense attorney's failure to CHALLENGE the "chain of evidence" scenario that followed - specifically, the "body" of RH which was "found" by "passerby" nurse sometime later - DH's testimony AND the remaining balance of the manufactured eyewitness evidence that the prosecution suddenly AND surprisedly utilized against Kevin at trial BECAME the "root cause" for the wrongful convictions to BOTH murder cases.

64. In other words, between the moment (and BEFORE) RH was murdered on November 1st, 1989 and NOW (thirty-five-plus years later), much MORE incriminating evidence against this "Criminal Enterprise" which was operated by police officials who went ROGUE, remains CONCEALED to such an intricate plot and convoluted scheme that included FRAMING Kevin years later for NOT just one but a second murder that they ALSO committed.

65. The second one relates to the EH murder. This murder conviction of Kevin is based upon the testimony of a single witness, Rolf Sylver ("RS").

66. RS and the QDAO made a sweetheart deal w/each other in 1995 to have RS' Robbery and Burglary case against an elderly man dismissed in exchange for favorable testimony for the NYPD and QDAO against Kevin as to the 1989 RH and 1991 EH murders.

67. Kevin's guess here is RS truly believed (in his mind) that the NYPD and QDAO were BOTH making an offer to him that he could NOT refuse. In other words, either you are going HELP US set Kevin up w/these two murder cases OR we are going to set you up w/this Robbery/Burglary case.

68. As evident here, RS' weakness submitted to such an ULTIMATUM and these DEMANDS by the NYPD and QDAO.

69. In any event, due to the fact that RS has been an informant for the NYPD since 1991 and had already been CONVICTED for three prior felonies, ALL parties involved, including RS, KNEW if he was convicted at trial for his present Robbery/Burglary case, he would receive a MANDATORY life sentence in prison.

70. As stated-above, informant RS testified at Kevin's trial that he (Kevin) told him he killed RH, days after he was murdered, while he (informant) was on a jailhouse phone. Of course, no such tape recorded phone calls were ever produced or introduced into evidence during any of Kevin's criminal proceedings since such a conversation never transpired.

71. Informant RS also testified that while he and Kevin sat blocks away from the EH murder scene, Kevin told him moments after the killing at "7:15am" that someone else shot him at his behest.

72. This false UNCORROBORATED hearsay testimony of informant RS was the basis of Kevin's illegal arrest to the EH murder case (and RH case as well).

73. In other words, the D.A. did not even believe that they could obtain ONE murder conviction - let alone TWO - based upon the SOLE testimony of a three-time felon, which, many years AFTER each murder transpired, entailed a quid pro quo deal made between the two of them so RS could SWITCH his existing cell and possible life imprisonment w/Kevin.

74. Such an illegal and voidable contract, under the circumstances (a "squeeze-play" against RS), assisted the NYPD, QDAO and others in succeeding w/their ultimate goal. The only real difference here is Kevin actually received TWO life sentences.

75. RS was easily manipulated and coerced into advancing FALSE uncorroborated testimony in the grand jury for Kevin's two illegal arrests.

76. Between Kevin's two illegal arrests and the State introducing (OR failure to introduce) into evidence in each case during separate grand jury proceedings w/respect to this 'pattern' of the same OR similar crimes that the NYPD, QDAO and others who acted in-concert w/one another (and continue to do so) AGAINST Kevin (and the two murder victims here) are as follows:

a) fabricated physical evidence as to the "chain of causation";

b) tampering with each "corpus delicti";

c) altered/tampered with each "crime scene";

d) false/perjured testimonies pertaining to the "chain of causation";

e) false/perjured testimonies pertaining to the condition and/or integrity of "corpus delicti";

f) false/perjured testimonies pertaining to the "corpus delicti" of the charged crime (RH) AND the prosecution of Kevin for the charged and uncharged crimes pertaining to the EH case;

g) "Reverse Molineux" evidence (see also federal counterpart under Fed.R.Evid. 404(b), which is a "rarely-used variant of Rule 404(b), known as 'reverse 404(b)' ") pertaining to "third-party guilt" that directly LINKS the Police to the each victim on different dates AND different locations which occurred only blocks away from each other as they were "present" on the scene at the exact time of each victim's respective death;

h) "concealment" of "material facts" that clearly EXONERATES Kevin for each prosecution;

i) filing FALSE "business record" in a criminal proceeding;

j) "collision" between ALL parties named herein;

k) "misprision of felony";

l) "compounding a crime";

m) "fraudulent concealment" to material evidence;

n) "scheme to defraud" the Public AND Taxpayers;

o) "scheme to defraud" the government;

p) "clean hand" doctrine violations;

q) "fraud upon the court";

r) "criminal enterprise" operated by public officials and their subordinates;

s) "obstructing governmental administration";

t) the "malicious prosecution" of Kevin in each murder case; AND

u) the "lack of jurisdiction" due to having NO probable cause to arrest Kevin in either case.

77. Once Kevin was basically KIDNAPPED, it was MUCH easier for the police and QDAO to go to the EXTREME measures of knowingly presenting MORE manufactured evidence and false testimony at his trial from witnesses in relationship to the 911 tape, RH's medical records, informant RS, RH's brother DH and even worse, the ACTUAL SERIAL KILLERS, also known as "first-officer-on-the-scene", to BOTH cases.

78. Just so that the NYPD and QDAO could obtain these TWO murder convictions against Kevin that they KNEW from its inception "could not" and "did not" commit since it were their OWN co-conspirators who actually committed them.

79. Of course, the "motive" behind framing Kevin entails something MUCH BIGGER than informant RS. He was just utilized as a means to an end.

80. Accordingly, this same three-time-convicted-felon witness who has been a police informant for at least five-plus years before testifying at Kevin's trial is as follows:

81. On 10.25.91, Kevin received a beep from his pager at exactly "7am" while at a contractor's office in Long Island and a second beep shortly thereafter. Kevin made a quick phone call immediately after the first beep before they departed. They then drove 35 miles back to their neighborhood located in Queens County.

82. Once back in their neighborhood, they went to a restaurant blocks away from the murder scene (unbeknown to RS, according to his testimony) and ordered food "to-go." Sometime between the 35-mile drive back to the neighborhood, we dropped an unidentified female off somewhere along the way who had accompanied us to Long Island.

83. Kevin told RS to take him home which was not too far from the restaurant. About midway, while driving towards Kevin's house, informant RS -coincidentally - drove by the crime scene where EH was just killed.

84. At such time, informant RS started to pull over to see what was going on when he saw a "large crowd" of people as he recognized some of the individuals from our neighborhood that was part of this group. The "large crowd" surrounded an unidentifiable person (later identified as EH) who was lying on the ground.

85. Kevin suddenly looked up and realizing where they were, told informant RS to "Don't stop. Keep driving."

86. While they sat in front of Kevin's house, he then told RS moments AFTER leaving the murder scene of EH at "about 715am" that:

a) the first beep indicated that "It was done" (EH was killed);

b) the second beep meant that "They got away" (the killer(s) );

c) he ordered the shooter ("Just") to murder EH (no time or place when this alleged "order" supposed to have transpired); and

d) we went to Long Island for the SOLE purpose of creating an "alibi".

87. Most recently, however, Kevin received "newly discovered evidence" (October 2023) that EH was killed immediately AFTER Police Officers arrived on the scene at "7:15am" (NOT before OR at the time of the "7am" beep as informant RS testified about).

88. The first-officer-on-the-scene testified at trial that he and his partner was on the scene at exactly "715am" and he radioed his dispatcher for "back-up" once on the scene since there was in fact a shooting involved.

89. Notably, while on the witness stand, defense counsel had him CONFIRMED such testimony about his ARRIVAL TIME by having him view his memo pad.

90. This same Police Officer also testified that he and his partner arrived at "715am", AFTER they received a radio call several minutes EARLIER, "Male Shot".

91. Our "new" reliable documentary evidence NOW proves that NO such prior radio call existed BEFORE "715am", despite the fact that this police officer testified that this was the SOLE reason that brought him and his partner to this homicide scene at such a critical time.

92. Most importantly, this is the SAME Hollywood script from the RH murder case.

93. Once again, Kevin is NOT on the scene at the time the victim EH was shot dead as this same police, informant RS and a third prosecutor's witness (who Kevin's attorney named as OUR witness in OUR "Alibi Notice" but failed to call him for OUR defense), ALL testified and corroborated each other to this EXONERATING component FOR Kevin at the grand jury and trial.

94. So WHY prosecute Kevin for the EH murder?

95. This "new" evidence also displays that the first 911 call was actually received by the 911 operator at precisely "07:17" hrs. - 2 minutes AFTER police arrived, killed EH and immediately departed.

96. The 911 transcripts most recently disclosed to Kevin also indicates that the police made it APPEAR as if they FIRST appeared on the scene at "0723" hrs., but in reality this was their SECOND appearance. Of course, one must view such INCRIMINATING evidence against this Police Officer and partner in conjunction w/the first-officer-on-the-scene's trial testimony that him and his partner FIRST arrived on the scene at "715am".

97. Another piece of vital information was withheld from Kevin by the prosecution concerning informant RS that would have made their single witness case of EH suffer even more and given the BOTH cases a severe blow to "TIP the SCALES of JUSTICE" in favor of proving Kevin's innocent at his joint trial.

98. In October 2023, the QDAO once again revealed for the first time to Kevin a police report in which RS was interviewed by homicide detectives ONLY days after EH was killed when he (RS) just so happened to have been incarcerated, AGAIN, this time due to his parole suddenly being revoked.

99. Inside said report, if one is to believe it, informant RS clearly contradicts himself, the NYPD and QDAO's "new found" story that he testified to seven-plus years later at Kevin's trial.

100. According to the interview of informant RS conducted by a lead detective in the investigation for the killing of EH who memorialized in a DD5 police report, in relevant part, states the following:

"On Friday 10/25/91 Kevin (Jackson) came to Sylvers residence EARLY and picked up Sylver. The two of them then drove to a construction site on Long Island (Bancker Const in E. Rockaway). While enroute Jackson stated 'If I get a beep its done". While at the construction site Kevin was beeped TWICE. Kevin went into the TRAILER and made a phone call. When he came out he stated IT WAS DONE AND GOT AWAY CLEAN. Sylver asked what was done (Jackson never told). Later in the day back in Ozone Park Pk. Sylver learned that Hicks was shot. Back at the office with 'T' Kevin (Jackson) Kevin (Jackson) stated 'MY MAN GOT EARL' . Jackson then went on stating 'NO ONE HERE WOULD DO IT SO I GOT MY PEOPLE TO DO IT. ' Sylver was told by Jackson that JUSTICE did EARL \* \* \* During the day Jackson was stating NO ONE IS GOING TO FUCK WITH QUEENS COMMUNITY ANYMORE I GOT HIM I GOT EARL and also stated how Earl had DIS'ED HIM. Sylver was also told that the only reason he and Jackson went to Long Island was to establish an ALIBI."

101. This DD5 report was never received by Kevin until most recently. And if counsel had it prior to the cross-examination of RS, absent Kevin knowledge, he failed to utilized it EFFECTIVELY as any skilled attorney would have.

102. Also, if trial counsel received such a report (and other "new found" material in BOTH cases), which totally contradicts ANY witness or D.A.'s theory of the case - MATERIALLY - he could and should have moved for sanctions (i.e., e.g., a dismissal of each indictment, continuance for an investigation, etc.) due to these ongoing belated disclosures just before OR in the middle of trial.

103. Either way, said report used at trial in an EFFECTIVE way would have impeached informant RS testimony where he claimed we left Long Island immediately after the "7am" beep, which indicated "It was done" (the EH killing) BEFORE we drove 35 miles to a neighborhood restaurant in less than 15 minutes (NOT only IMPOSSIBLE but it also defies logic and mathematics) and we, somewhere along the way back the neighbor, dropped an unidentified female off.

104. At about "715am", RS then so happened to have drove by the crime scene where police was just there (as the police testified at trial about) and OBVIOUSLY departed according to the reliable 911 transcripts most recently disclosed to Kevin AND RS' testimony that Police was NOT on the homicide scene at such time (Emphasis supplied).

105. Noteworthy, this vital aspect of RS' trial testimony was brought out by Kevin's trial attorney during cross-examination. We do not believe this was done by-chance.

106. Finally, moments later after NOT stopping at the crime scene, once it was established here that Kevin CONFIRMED w/his own two eyes about what the two beeps indicated (for non-hearsay purposes) AND "15 minutes" BEFORE the EH killing ACTUALLY OCCURRED, is when Kevin and informant RS are parked in front of his house.

107. Now suddenly Kevin is telling RS about his involvement w/such a killing (namely, the UNCHARGED crimes of "solicitation" and this "conspiracy to kill EH" at an undisclosed date, time and location) so that there is a CAUSAL CONNECTION between Kevin's "new found" alleged admissions to these uncharged crimes AND charged crime.

108. In spite of the fact that these admissions were allegedly made right AFTER Kevin just remained SILENT about "15 minutes" EARLIER while they were in Long Island when asked by RS, "what was done" (see police report excepts above), under either storyline that the NYPD, QDAO and informant RS ALL concocted, there is NO actus reus ("guilty act") that Kevin did here as to the CHARGED crime of murder in the second degree.

109. Here, it was important to Not implicate RS as an accomplice - and rightfully so - since informant RS and ALL parties involved KNEW we BOTH were ACTUALLY in Long Island at a contractor's office in a "business meeting" at the precise time Police killed EH, which is "35 miles" away from the place where they killed him.

110. Of course, the truth of the matter was easily CONFIRMED, which Kevin sure it was, through the owner of the construction company and several of his supervisors that were also present at the meeting where a member of "Queens Community" (Terrance Young) was placed on the contractor's PAYROLL (MORE documentary proof) as Mr. Young started working for them that following Monday on 10.28.91.

111. This "new found" "chain of causation" AND "chain of evidence" that the prosecution's three-time-felon witness case was SOLELY based upon, demonstrates that material evidence were ALTERED in comparison to the 10.30.91 report - if one was to even believe such a police interview of informant RS.

112. A second concealed police report dated 11.9.91 that correlates directly to the above concealed report dated 10.30.91, once again, if BOTH documents were used EFFECTIVELY by any skilled trial attorney, would have changed, at minimum, the outcome of the EH case.

113. Titled, " Re-Interview of Rolf Sylver", the second following UNDISCLOSED report to Kevin and the jury states that:

"1. On this date the undersigned was informed that Rolf Sylver, presently incarcerated at Queens House of Detention, had contact this command on 11/8/91 and requested that I contact him. On this date 11/9/91, Sylver again called this command and was informed that I would meet him this date at Qns. H of D.

2. On this date the undersigned accompanied by Dets. Geary and Salvo were present at the Queens H of D where we met with Rolf Sylver. Here after advising him of his rights (paper attached) he informed us that he would be willing to testify in the Grand Jury as long as his identity was not disclosed. Also at this location he positively identified a NYSIS Photo of Richard Rodney (known to this Department under NYSIS [redacted] as the person he knows as JUSTICE. Sylver was advised that his willingness to cooperate in this matter would be made known to the Queens DA's Office as soon as possible by the undersigned."

114. As stated-above, whether the 11.9.91 report was concealed or not, properly used EFFECTIVELY by an attorney, the "cooperation agreement" that informant RS was obviously seeking that didn't materialized until years later when he was arrested once again - this time for a felony of robbing an elder inside of his home in which NOW he is under even MORE pressure by the NYPD and QDAO "to cooperate in this matter" - should have been revealed to NOT only Kevin but more importantly, the jury.

115. An investigation could have been explored AND exposed as well as to what OR why the QDAO failed to honor informant RS' "willingness to cooperate in this matter." Especially since Richard Rodney also known as "JUSTICE" was ALIVE then and the years that followed.

116. Remember, JUSTICE was the alleged killer of EH according to the NYPD, QDAO and informant RS' UNCORROBORATED hearsay "chain of evidence" that Kevin's TWO wrongful convictions are hinged upon.

117. RS' request to make such a deal that failed to materialize in 1991 - only days after EH was killed and JUSTICE was still alive and available to either confirm OR deny whether informant RS alleged police statement was even credible or reliable "15 minutes" BEFORE EH WAS ACTUALLY KILLED - was due to the fact that the NYPD and QDAO had to devise a scheme to get around the TRUTH that Kevin AND informant RS BOTH had SEVERAL credible and reliable 'ALIBI' witnesses where they were during a "business meeting" in another county in which Kevin placed 'T' (Terrence Young) on one of the contractor's sites that they had hidden in "Queens Community"?

118. As a result, Kevin had a boda-fided alibi- "35 miles" away - for TWO different occasions:

a) the ACTUAL time and place EH was murdered; AND

b) the ACTUAL time and place when informant RS perjured himself (w/the NYPD and D.A.'s knowledge) about us being in front of Kevin's house AND he allegedly incriminated himself to a murder the Police just had committed (Emphasis added).

119. ABSENT the incriminating statement ALONE that informant RS is attributing to Kevin presumably in the grand jury and clearly at trial, his testimony to this bogus storyline is WORTHLESS.

120. And then years later, the NYPD and QDAO's scheme manifested by BOTH agencies decided to use coercive and manipulative tactics on informant RS in which the SAME lead homicides detectives who were assigned to the RH case from day one arrested him in 1995 for the Robbery/Burglary case so RS' "new found" FALSE storyline NOW places Kevin and himself blocks away from the location DURING the precise time of the EH killing (unbeknown to RS - according to the State's only UNCORROBORATED FALSE HEARSAY testimony of him).

121. In any event, this UNDISCLOSED police interview of informant RS would have w/out any doubt impeached not only his trial testimony but it also would have crushed the prosecution's ENTIRE case against Kevin.

122. And of course, according to this concealed police report, RS was NEVER told by Kevin while in Long Island - OR while they sat in front of Kevin's house "35 miles" and "15 minutes" or so later - about either storyline asserted here by the NYPD, QDAO and their longtime informant RS.

123. Thus, "newly discovered evidence" of BOTH police reports, coupled w/the "third-party culpability" AND "similarity" of BOTH crimes evidence as described-above, shows that informant RS gave Two contradictory FALSE stories (i.e., the "chain of evidence") in order to submit AND conform to the NYPD and QDAO's Gestapo tactics that was used on him and soon thereafter, their quid pro quo deal that the detectives pioneered in which the District Attorney and RS ultimately contracted together years later against Kevin.

124. Despite such a submission and conformity by informant RS to law enforcement, the State's case STILL FAILED to prove that Kevin is factual guilty of killing EH under either theory/scenario - that is, the police report false "chain of causation" as opposed to RS' false "chain" testified at trial - that Kevin was "acting-in-concert" w/the alleged perpetrator ("Justice") who COULD NOT have:

a) paged Kevin indicating that "It was done" (EH was killed) at time when EH was STILL ALIVE; and

b) been at the scene at the critical TIME when EH was in fact murdered since the ONLY people that were there BEFORE he was killed between "715am" AND "717am" was Police who departed BEFORE the FIRST 911 caller was able to identified them.

125. Since the alleged killer, "Justice", was deceased due to an unrelated incident well before Kevin's TWO illegal arrests, a vital QUESTION must be asked here:

According to the IMPOSSIBILITY of "Justice" committing the EH murder as described-above, are these the reasons why he was NEVER even approached by homicide detectives - during the years he was still ALIVE - concerning the killing of EH?

126. Bottom line, under the circumstances as described-above, it does NOT "LINK" Kevin OR "Justice" to the EH killing between "715am" AND the FIRST "717am" 911 call which the first-officer-on-the-scene's trial testimony AND other "newly discovered evidence" - as illustrated above and below - NOW establishes by clear and reliable evidence that the Police are the perpetrators (NOT "Justice") who actually brought about the death of EH.

127. This is also true since the jury failed to follow and OBEY the Court's instructions that Kevin was in fact in a "business meeting" "35 miles" away from the EH crime scene on 10.25.91 at "715am" (ABSENT an objection from the prosecution), at a time WE now all KNOW the NYPD were there and immediately departed from such a place at such a critical time.

128. Of course, one can NOT just view this isolated instruction by the Court to the jury in a vacuum. BEFORE the jury was instructed by the Court that Kevin was 35-miles away from the crime scene at "715am", the Court instructed them that in order to find Kevin guilty of murder - beyond a reasonable doubt - under the premise of "acting-in-concert, he had to be "present" on the crime scene during the time EH was killed.

129. Coupled together, the verdict is NOT only defected but it also proves to be an "erroneous finding" by the trier of facts - here, the jury.

130. More importantly, in the RH and EH murder cases, such newly obtained evidence shows a "fact pattern" (particularly, the same OR similar "Modus Operandi") in which:

a) the first-officer-on-the-scene in each case testified that he and his partner received a radio call from their dispatcher, "Male Shot", minutes BEFORE their arrival. In other words, BOTH Police Officers in BOTH cases are INVOLVED w/these two crimes while BOTH victims were STILL ALIVE;

b) BOTH murders were for the SAME MOTIVES (i.e., for each of the victim's ORGANS and BODY-PARTS);

c) Police Officers were "present" in BOTH cases at the precise time when each victim was killed (as Kevin was NOT, as shown above);

d) police left BOTH crime scenes immediately thereafter;

e) in each shooting, BOTH victims were "found dead" by a THIRD-PARTY that can verify that Police LEFT the scene AFTER the time of each shooting based upon the first-officer-on-the-scene's testimonies at trial AND "newly discovered evidence" of when each crime actually occurred;

f) the SAME police then REAPPEARED as if they were NOT there at the precise time when BOTH shootings actually occurred based upon the first-officer-on-the-scene's testimonies at trial AND "newly discovered evidence" of when each crime actually occurred;

g) the first-officers-on-the-scene "found" BOTH victims shot dead AFTER shooting each one several times, DEPARTING and then RETURNING to the crime scene, which EMTs, upon their arrival, CONFIRMED in each case that BOTH victims was Dead-at-the-Scene; and

h) BOTH victims were killed by a gunshot wound.

-- Another important aspect of the same or similar M.O. (better known as the so-called "signature" crime exception) that exist here w/these two crimes, despite being two years apart from one another, is the fact that:

i) BOTH victims are black;

j) BOTH victims were involved w/the SAME coalition business;

k) BOTH victims were murdered ALLEGEDLY due to coalition-related-business;

l) BOTH killings occurred only blocks away from each another;

m) BOTH victims were either going to (RH) OR leaving (EH) their homes early in the morning;

n) BOTH victims was killed within the SAME 106 precinct;

o) the NYPD and QDAO conspired against Kevin in BOTH murder cases in order to: (i) utilize the Courts as a vehicle OR like a TOOL as their means to illegal arrest him; (ii) improperly join each case together for one trial as IF each case had Kevin's "signature" to them despite KNOWING the difference that their OWN "signature" was stamped on BOTH cases; and (iii) wrongfully convict AND imprison him for the rest of his life; and

p) BOTH law enforcement agencies have KNOWN, for the last three-and-a-half decades - to date - that Kevin "could not" and "did not" commit neither murder since it was themselves who pioneered AND executed this intricate "White-Cops-Killing-Blacks-For-Organs" SCHEME. COINCIDENTAL???

131. If COINCIDENTAL, then explain the following "fact pattern" that exist here in regards to BOTH murders in which the NYPD and QDAO illegally arrested Kevin many years later based upon their single three-time-felon informant witness, RS:

132. Particularly, the "new found" material evidence that was introduced at Kevin's joint trial that suddenly INCRIMINATES him in a MORE direct way to BOTH murders than previously claimed.

133. For instance, in the RH case, the actual shooting occurred at a time when NYPD is on the scene according to the Medical Examiner's findings of facts (specifically, the "chain of causes ..." that brought about RH's death) AND the Police testimony at trial.

134. At TRIAL, however, the prosecution totally DISREGARDED this material evidence that the Medical Examiner found which is based upon BOTH pieces of evidence combined that clearly EXONERATES Kevin (and INCRIMINATES the Police), which each piece of evidence originally derived from the "NYPD" between the moment police arrived at the scene at "958am" AND the exact SAME time RH was shot dead.

135. Instead, the prosecution turns around at TRIAL, CONCEALED one of the essential pieces of evidence (that is, the actual time of the RH shooting of "958am") and REPLACED IT w/the "952am" "chain of causes...", which INCLUDES the "new found" INCRIMINATING fabricated hearsay eyewitness evidence AND manufactured medical records of RH.

136. Here, the exact same "fact pattern" exist within the EH case two years later.

137. Once again, the EH shooting actually occurred at a time when Police is on the scene according to the Police testimony at trial, coupled w/the FACTS that were just divulged to Kevin (particularly, the 911 transcripts).

138. At TRIAL, however, the prosecution totally DISREGARDED this material evidence (that is, the 911 transcripts) that clearly EXONERATES Kevin (and INCRIMINATES the Police), which each piece of evidence originally derived from the "NYPD" between the moment police arrived at the scene at "715am", the exact SAME time EH was shot dead AND the recorded time of the FIRST 911 caller.

139. Instead, the prosecution turns around at TRIAL, CONCEALED TWO of these essential pieces of evidence (that is, the actual time of the EH shooting of "715am" AND the 911 transcripts) and REPLACED IT w/the "7am" "chain of causes...", which INCLUDES the "new found" INCRIMINATING perjured hearsay testimony of their three-time convicted felon, informant RS.

140. In short, Kevin was the PERFECT PATSY for these "fact pattern" murders committed by cops who went rogue (specifically, the first-officer-on-the-scene in each case), who ALL are part of a "CRIMINAL ENTERPRISE", which so happens to be just ANOTHER continuous "fact pattern" to their racketeering activities.

141. And such criminal activities, coupled w/the QDAO's continuation of such a "fact pattern" concerning - AT LEAST - two separate murder cases that occurred two years apart by prosecutors/public officers who went rogue as well.

142. Thus, it took a TEAM effort to accomplish what has been done here. Such an perplex SCHEME could not AND would not have been successful absent other participants - whether directly or indirectly - in which these participants ALL were part of the grand scheme of things.

143. Sort of like a "Covert Operation".

144. Each and every one of them was more like a spoke in a rim who at the end ALL were willing AND able participants. Whether, each "spoke in the rim" was an accessory BEFORE, DURING or AFTER-THE-FACT to BOTH murders, which included but are not limited to the NYPD, EMTs, public and private hospitals, the Office of the Chief Medical Examiner and District Attorney's Office of Queens County.

145. Justice demands, however, that each culprit MUST be accountable, be held responsible AND therefore liable for their OWN misdeeds as to what occurred here in its totality.

146. In reality, such an ENIGMA was so kind of easy to manipulate these two-years-apart events as to timeline once the TRUE times of when each killing occurred was REPLACED w/the "new" altered times in which the ACTUAL time of death to BOTH murders were CONCEALED from Kevin and the JURY by the NYPD, QDAO and others for obvious reasons.

147. Many years later, however, the TRUE time of death in each murder case were revealed to Kevin once BOTH of his wrongful convictions were well cemented in the Appellate Courts.

148. NOT stated-above as to the SIXTEEN-PLUS same OR similar continuous "fact-pattern" pieces of evidence that correlates DIRECTLY w/the RH and EH murders (better known as "signature" crimes), which derived from the NYPD and QDAO, is where the NYPD and EMTs sometime later TAMPERED WITH the crime scene by illegally removing the victim's "body" to a local hospital - ABSENT notifying the Medical Examiner's Office BEFOREHAND - in which BOTH murdered victims remained "expired" for a certain period of time at the crime scene BEFORE such an illegal maneuver was made.

149. Another continuous "fact pattern" pertaining to these serial killers' "signature" crimes (better know as "Reverse Molineux") that exist in BOTH cases and NOT stated-above is the fact that each THIRD-PERSON witness who FIRST became involved w/each killing AFTER each victim was killed did NOT testify in ANY of Kevin's criminal proceedings so that the TRUTH of what followed the initial "chain" ((i.e., the Police killing) will NOT be explored AND exposed during any of his CORRUPTED criminal proceedings that were and CONTINUE to be advanced against him in the Criminal AND Civil Courts by the NYPD, JHMC, Medical Examiners Office, D.A.'s Office AND others.

150. It is a proven fact, by the NYPD and QDAO's OWN admissions (concessions) that the "similarities" that exist here between the RH and EH murders were committed by the SAME enterprise.

151. These concessions made by the SAME Criminal Enterprise that actual planned and methodological executed in killing BOTH victims here - in conjunction w/the EIGHTEEN-PLUS "similarities" - as described-above, SPEAKS VOLUME (Emphasis added).

152. Indeed, the Federal and State Constitutional "fair notice" requirements to an accused who is indicted upon the prosecution's evidence presented in the grand jury that supports their theory of the case embraces a "good faith" analysis.

153. Any OTHER "new found" evidence that DISPROVES a "material" fact that was introduced into evidence during grand jury proceedings which originally supported an essential element to the CHARGED crime during ANY Criminal (or other) Court proceedings thereafter (while ALSO proving a completely contradictory "material fact") can ONLY show that the "new found" MORE incriminating scenario (or BOTH) are NOT only material that were fraudulently CONCEALED from the accused AND the jury but also, one, if not BOTH, of the scenarios are in fact were falsified by the District Attorney (including parties who are in privy w/them) AND must be deemed to have been done in "bad faith".

154. To be sure, once the belated disclosure evidence is eventually EXPOSED, it becomes FAVORABLE material evidence towards the accused guilt AND punishment.

155. Here, the egregious misconduct AND lack of respect by the NYPD and QDAO (including others) for the "Rule of Law" and truth-seeking process is manifested.

156. Between the "newly discovered evidence" pertaining to:

a) the NYPD, QDAO and others of "tampering w/physical evidence" (specifically, the FIRST taped 911 call AFTER RH was "found dead" by the "passerby" nurse, EMS and JHMC medical records of RH AND each of the victim's "body" -the "corpus delicti" - in BOTH cases);

b) "third-party culpability" evidence to EACH murder(that is, INDIVIDUALLY); AND

c) "reverse Molineux" evidence (that is, the CONTINUOUS "fact-pattern" of "similar crimes") where the first-officers-on-the-scene were LITERALLY on the scene "FIRST" at the precise time to BOTH murders (that is, COLLECTIVELY), automatically ELIMINATES: (i) the bogus eyewitness evidence; (ii) the three manufactured hospital deaths in the RH murder case; AND (iii) perjured testimonies of RS to BOTH murder counts, which will ultimately DESTROY the very foundation that BOTH indictments rest upon against Kevin.

157. As a result, such a dismissal of BOTH indictment will require Kevin's immediate release from prison.

158. Simply put, after 30 years of being wrongfully imprisoned, Kevin was deprived of the right and a meaningful opportunity to present an Alibi, third-party-culpability (individually AND collectively [reversed Molineux] ) AND fabricated evidence (i.e., a frame-up) to a defense that the jury DID NOT hear for the Police killing of RH and EH.

159. It cannot seriously be disputed here that between the MULTITUDE of "new" evidence that the jury DID NOT hear, as displayed above, AND "old" contradictory evidence that the jury DID in fact hear, as displayed above, pertaining to the "central issue that lies in BOTH murder cases against Kevin Jackson for the shooting deaths of Richard Harrison AND Earl Hicks [which] is the altering of the time of place AND death in the Richard Harrison case AND the altering of the time of death in the Earl Hicks case by the prosecution" (see above, par. 1), "the facts underlying the claim[s], if proven and viewed in light of the evidence as a whole, would be sufficient to establish by clear and convincing evidence that ... no reasonable factfinder would have found [Kevin] guilty of the underlying offense[s]." (See 28 USC 2244[b][2][B)] ).

160. As a United States Marine veteran, when Kevin was a teenager just months fresh out of high school, he was one of "The Few. The Proud."

161. As a result, Kevin was willing AND able to give the ULTIMATE sacrifice for OUR freedoms AND opportunities for those who was NOT willing OR able to take on such a risk or task.

162. Kevin would never have imagine, however, that THREE decades later he would STILL be fighting against the SAME government that allowed him to enlist for the SAME freedom AND opportunities that they STOLE from him and the two victims he knew, had NO quarrels with AND respected wholeheartedly.

163. Nor did Kevin ever phantom that he would NOW be advocating for RH, EH, "Justice" AND others alike, which entails that OUR same government have concocted in a multitude of murder scenarios pertaining to NOT just one BUT two separate murders that were completely fabricated against him from its' inception.

164. But worse than that, part of this SAME government KNEW all along - through public records AND public officials (AND others), from the moment of impact (or BEFORE) when the FIRST killing occurred 35 years ago AND the other one occurring two years later, that Kevin was ELSEWHERE at the precise time when each murder transpired since it was their OWN who were the ones who actually committed these crimes AND the ongoing COVER-UP that followed between then and NOW.

165. Between the thirty years of being wrongfully imprisoned for crimes he "did NOT" and "could NOT" commit AND the NOW that Kevin has learned that these racially AND financially motivated crimes was for the SOLE purpose of stealing the victims' organs (namely, their hearts), he has been AND will continue to make a good-faith effort to reconcile AND possibly amend these two victims' loved ones' BROKEN hearts by exposing the truth of the matter to them.

166. Ironically, Kevin had always realized from the day he was illegally arrested that it was, in large part, the training and discipline that, to date, he is so honored and grateful for this SAME government - through the Marine Corps - to have taught, disciplined and prepared him for the struggle OUR government have wrongfully imprisoned him for.

167. As Kevin's love ones and him continue to fight against these evil forces that exist AND are well known to Mankind, we are still in need of public support, which includes an attorney AND expert (forensic pathologist) who BOTH must have integrity AND are NOT afraid to go against "THE POWERS THAT BE".

168. Here, AFTER being successful with their "White-Cops-Killing-Blacks-for-Organs" Scheme, the Court was then utilized as a tool (vehicle) for an evil purpose so that the NYPD, QDAO and others can accomplice their ultimate goal in removing Kevin - a PUBLIC FIGURE (Community Activist) - from an urban community, which has suffered even MORE since his removal, ALL for political reasons.

169. Namely, such a removal was due to Kevin's Community Activism that consisted of being a VOICE for the underprivileged by simply advocating for high-paying union jobs in the construction industry.

170. Kevin's motto for his nonprofit organization was simple as just described: "An Honest Day's Work For An Honest Day's Pay". NO MORE. NO LESS.

171. Within a seven year span, Kevin's organization was a vital instrument in helping his members pour over $50 million dollars into OUR local communities in such a manner that was apparently against the status quo.

172. ALL Kevin's organization was actually doing w/the locals was exercising OUR first amendment rights pertaining to "freedom of speech" AND the "people peaceably to assemble". However, doing so cost him, his loves ones and the Community at Large a price none of US ever bargained for.

173. Still, after ALL what has transpired here, IF Kevin had the golden opportunity to do it again, he would. ONLY because it was for the betterment of his fellow man AND neighbor, their love ones AND the community where we ALL lived.

174. As a Marine veteran AND as his Constitutional DUTY to protect ..., which he owed, Kevin served his Country. As a Community Activist AND as his personal HONOR to advocate ..., which he paid dearly, he served his Community. And NOW as a Prisoner AND as an UNDESERVING incarcerated individual ..., which he KNEW the risk AND consequences involved, he remain serving a Death-Penalty-By-Sentence for two murders that were committed by the SAME police officers who testified against him in the grand jury AND trial - ALL for the sake of each of the victim's organs AND body-parts.

175. In conclusion, Kevin's love ones AND supporters are NOW seeking justice for NOT only Kevin AND his friend "Justice" whose memory the NYPD and Queens D.A.'s Office illegally disgraced WELL AFTER his death in which he could not defend himself but also for Richard Harrison AND Earl Hicks, their loved ones AND the Public at Large; especially since such an intricate plot that was formulated AND executed through an ENTERPRISE operated by CRIMINALS who were (and some still remain) employed by OUR government AND who are responsible for these TWO killings that occurred TWO years apart - MAY STILL EXIST TODAY.

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