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S.C. SUPREME COURT

2-22-26

Dale E. King

Appellate Case # 2025-001062

RE: PRO SE CERTIORARI

Failure to investigate

① on page 34 of 36 officer report May 15th 2017. at 8:05 King returns to room with hotel owner, owner exits after approximately 15 seconds, then King exits approximately 39 seconds later. that person is with me was Atul Patel.

on page 156-157 in the court transcript

Atul was in court on page 157-Line 19 he was asked did you go up to the room at all?

Line 20 - he said NO, ma'am.

Same transcript pages 158-159 my counsel never challenged the false statement made in open court, she didn't know he lied or she was ineffectual in her investigation.

② Page 5 of 36 officer report

8:30: Officer Jayne with his body cam on made contact with EMS personnel and the complainant, Dale King.

Officer Jayne was a on the scene and brought a body cam with him, counsel did not call him as a witness, we had two witnesses, the body cam would

have been a ~~major~~ vital part of my defense: Camera don't waver, how could a Counsel person miss important information like that?

③ Back to page 34 of 36 at 8:15 fire and rescue arrives at hotel room, INV Raley ~~was~~ stops using the security video, and decided to hand write the rest of the events of the day at the hotel, why would he do that? as you can see the security video was doing a great job of logging everything. I found that to be very unprofessional, almost like witness tampering, contaminating the crime scene,

④ a copy of the Beaufort Police Department Crime Scene Log was included for you to view, NOTE: he stopped the camera almost two hours. what possible reason would he have for doing that. (Crimen falsi)?

⑤ The missing photographs

① Dale King (myself) when I discovered my wife that morning she was not laying down at all, she had left or right arm on back of couch one ~~knee~~ knee in seat of the couch with her head down, I did turn her head and that could be the cause of tear or damage to her neck.

② EMS worker said she was on her back when she GOT there

③ Coroner said she was on her left side when he got there, and he saw abrasion.

④ INV. Raley: said he couldn't see the abrasion until she was lifted to put in body bag (PAGE 6 OF 34) Deputy report the only thing we all had in common was that we saw the blanket,

INV. Raley was in charge of evidence he took all photographs, I made my request, counsel should have followed my wishes, as you can see they do exist.

therefore I feel the court should consider nonfeasance.

So my complaints still stand, my counsel was ineffective in her investigation, communication, and witnesses.

I still seeking New Trial, or dismissal. Because remember when the state wanted to prove that GAY had struggle with the ~~Victim~~ Victim at the tunnel, they took photographs of the crime scene, those photographs help the state with their case.

Same apply here in my case those photograph has the same weight in proving my point, all relevant evidence that has a direct bearing upon and tends to establish or make more or less probable the matter in controversy.

as the Court can ~~see~~ see the photographs does exist, this act to omit the photographs intentional or unintentional failure to act which may impose criminal liability, if a duty to act under the circumstances is specified by law: Prosecutorial duty to disclose or Brady Rule, ~~wherefore~~ weather helps or hurt defendants case. Page 28 of 34 (Deputy Report) INV. Raley

my other complaints failure to communicate still stand as I filed if you haven't investigated or read the the discovery what would you have to talk to your client about, if ~~counsel~~ a I had really talked don't you think I have told her my boss man was in that motel room that morning?

would not I have told her the night in question my daughter Naomi called the police me and ~~Paul~~ Paul had just brought her from the train station that night and she called the police because Paul and myself was keeping up a lot of noise outside, she only wanted to get Paul to leave so I would come in.

⑤

Same for Bates, our conversation was on the Jail house visitation phone, we didn't have to go by what was spoken in court only, we had the whole thing on tape, she never bothered get a copy and listen for herself.

Do you really believe she took the time to talk to me? So I'm still say she didn't communicate with me.

What I'm saying that she was ineffective, we was not prepared to appear in court, because we was prepared I was convicted. had we, discussed my case, had she read the discovery, and done some investigation the out come of my trial would have been successfully in my favor.

DALE E King # 381842
(SB-11)

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4848 Gold Mine Hwy
Kershaw S.C. 29067

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of South Carolina
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Clerk of Court
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Columbia S.C.
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