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The Supreme Court of South Carolina

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January 21, 2026

Dale E. King, 00381842
Kershaw Correctional Institution
4848 Gold Mine Hwy
Kershaw, SC 29067

Re: Dale E. King v. State
Appellate Case No. 2025-001062

Dear Mr. King:

Your counsel has submitted a petition for writ of certiorari indicating that this appeal is without merit and moves to be relieved as your counsel. *Johnson v. State*, 294 S.C. 310, 364 S.E.2d 201 (1988). The records of this Court reflect that counsel served you with a copy of the Petition and Appendix.

Within forty-five (45) days of the date of this letter, you may file a *pro se* response to the petition filed by your counsel. In this response, you may raise and argue any issues you believe the Court should consider in this appeal. If you decide to file a *pro se* response, the response must be either typewritten or legibly handwritten, and it must have at least an inch margin on all sides. Further, you will need to only submit one copy of your response, and this copy should not be stapled or bound in any manner.

Very truly yours,

Brenda J. Shady

CHIEF DEPUTY CLERK

cc: Kylee Marcella Kanealey
Jessica M. Saxon

Supplement

SECURITY VIDEO:

On May 17th, 2017, I met with CHET PATEL, the former owner of Atlantic Inn. PATEL assisted in obtaining security video from the hotel on the date of the incident. After obtaining the video, I returned to the police department where I reviewed the video. Below are some of the key times:

May 14th, 2017:

2208 KING, WATTS and UNIDENTIFIED subject are seen of the video in front of room 233

2210 KING and WATTS enter the room and close the door as XXX walks away

2214 WATTS exits room 233, closes the door, walks down stairs and behind the building

May 15th, 2017

✓0802:KING exits room 233 and walks to the office

✓0805 KING returns to room with hotel owner, owner exits after approximately 15 seconds, then KING exits approximately 39 seconds later

✓ 0805:15 Hotel owner exits room, leaving KING inside of room

✓ 0805:54 KING exits hotel room

✓0815(Fire rescue) arrives at hotel room

After reviewing the video, I advised INV. DOWLING of my finding before placing the video into evidence.

INV. RALEY 8714

*I Told my Counsel this video shows every body
and what they did that occurred that morning. We should have
the video. See a... of*

*... of the fact
... the video
... next*

... discovery

Supplement

Officer Observations/ Actions:

On May 16th 2017 at approximately 0830 hours I responded to 2249 Boundary Street #233 (Atlantic Inn) in reference to a female that was not breathing. Upon my arrival to the scene I made contact with EMS personnel and the COMPLAINANT, DALE KING. KING stated the woman was his wife, VERONICA KING.

DALE KING stated he and V. KING went to bed around 2330 hours last night. D. KING stated when he woke up this morning he noticed she was on the sofa and not in the bed. DALE KING stated he went over to talk to her when he noticed she was not breathing. DALE KING stated he contacted 911 to have them respond.

EMS arrived on scene and stated V. KING had passed away. A crime scene log was started and the coroner was notified. A death scene questionnaire was also filled out. INV Raley and INV Dowling arrived to process the scene. After they took over I cleared with no further action.

Camera recording:

Body cam

Jayne ON

Sgt Goethie OFF

Cpl Whitney ON

Attachments:

Crime scene log

Death scene questionnaire



Beaufort County Emergency Medical Services

Patient Care Record

Name: GLOVER-KING, VERONICA

Incident #: 17EM05106

Date: 05/16/2017

Patient 1 of 1

Extremities		Capillary Refill	Not Assessed
Neurological		Neurological	Not Assessed

Assessment Time: 05/16/2017 08:17:25

Narrative

Dispatched for a female patient that is in cardiac arrest. UOA Beaufort City PD and FD are on scene. Pt is located on the second floor of the motel. She is found on a couch in the room. She has a towel over her. Her husband says that he last spoke to her last night at 11pm. She is pulseless and apenic. Cardiac monitor shows Asystole. Rigor mortis has set in in her extremities. Husband says that she has a history of seizures but does not take medication for IL. He says that they were both drinking yesterday. No illicit drug use. Husband found her laying on her left side and rolled her over to her back to see if she was breathing and then went to call 911. Coronor was notified. Scene left with Beaufort City PD.

Incident Details		Destination Details		Incident Times	
Location Type	Other Specified Place	Disposition	Dead on Scene, No Transport	PSAP Call	
Location		Transport Due To		Dispatch Notified	08:10:51
Address	2249 BOUNDARY ST	Transported To		Call Received	08:10:51
Address 2	ATLANTIC INN	Requested By	Family	Dispatched	08:12:33
City	Beaufort	Destination		En Route	08:13:18
County	Beaufort	Address		Resp on Scene	
State	SC	Address 2		On Scene	08:16:34
Zip	29902	City		At Patient	08:17:47
Medic Unit	EMS1	County		Depart Scene	08:31:22
Run Type	911 Response	State		At Destination	
Priority Scene	Lights/Sirens	Zip		Pt. Transferred	
Shift	B Crew	Zone		Call Closed	08:31:22
Zone	1A City Beaufort Hwy 21&170	Condition at Destination		In District	08:31:22
Level of Service	Advanced Life Support	Destination Record #			
EMD Complaint	Cardiac Arrest	Trauma Registry ID			
EMD Card Number					

Personal		Crew Members	
Name	Role	Certification Level	
DRAKE, ANJOHNENE	Lead	NREMT-Paramedic (NREMT-P)-M8005326;	
PITT, TANYA	Driver	NREMT-Basic (NREMT-B)-E3244378;	
GRAHAM, ARVELLE	Other - Student		

Mileage		Delays		Additional Agencies
Scene		Category	Delays	
Destination	1.6	Dispatch Delays	None	Beaufort City Fire, Beaufort City PD
Loaded Miles	-1.6	Response Delays	None	
Start	0.1	Scene Delays	None	
End	1.6	Transport Delays	None	
Total Miles	1.5	Turn Around Delays	None	

Item	Personal Items Given To	Comment
NONE		

Transfer Details	
Item	Value
PAN	Sending Physician
PCS	Sending Record #
ABN	Receiving Physician
CMS Service Level	Condition Code
ICD-9 Code	Condition Code Modifier
Transfer Reason	
Other Services	
Medical Necessity	

Billing Authorization

Language: en

Section I - Authorization for Billing

Decedent Last Seen Alive by	Dale King
Date & Time Last Seen Alive	05-15-17 @ 2330
Activity Decedent Engaged in at time of Death	Sleeping
Rigor Present When Found	Yes
Alcohol Bottle Present	Yes
Name of Investigating Officer	Inv. Charles Raley
Department	Bft, Police Dept.
Phone	843-476-1127
Chemical Analysis	General
Medical History	N/A
Date of Last Visit	07-19-2015
History of Drug and/or Alcohol Problems or abuse	Alcohol abuse
Additional Notes	<p>The decedent and her husband both lived and worked at the Atlantic Inn Motel. After them both got off from work they returned to their room and started drinking beer and taking shots of vodka. The decedent's husband stated he wasn't sure how many beers she had and felt she had two or three large shots of Vodka. At about 2330, he stated they both went to bed. Upon him waking up at 0800, he found the decedent moved from the bed to the couch without him knowing. He attempted to get her up for work and learned she was unresponsive and not breathing. He then ran to the main office and a worker call for EMS at 0812. EMS arrived at 0816 and pronounced the decedent dead. The decedent was nude on the couch with no covers on her when she was found. A blanket was placed over her by her husband. She was on her left side with her face towards the back of the couch. The decedent had what looked to be a swollen lip along with a small amount of blood in her nose. On her buttock / small of the back area, the decedent also had what looked to be an abrasion. The only medical history found on the decedent was dated 07-19-2015 where she fell while being intoxicated and went to BMH and received stitches for the same.</p>
	BRT # 290520
	Evidence Tag # 0096590

05-16-17 0844

✓ 2249 Bowley St. Rm # 233

TOD:

0400 -

seal # 0096590

✓ Glover, King, Veronica (S1)

D/F

DOB: 06-11-65 / SS # 251-45-8610

✓ Husband: Dale King - 543-524-6024

✓ Last seen @ 2330 going to bed

✓ Found sitting on sofa or side table
back of couch. Note - Cow by husband.

✓ Lip / nose swollen - back / Abrasion on
buttock - smell of Buck

✓ Drinky vodka + Beer all evening

✓ Intox - both - she had 2-3 shots
+ beer's ??

Both worked @ Motel - maid + maintenance

Supplement

INVESTIGATORS ASSIGNMENT TO CASE:

On May 16th, 2017, I, Inv. Raley, was notified by Inv. Dowling of a death scene at 2249 Boundary Street (Atlantic Inn) room 233. Inv. Dowling requested my assistance at which time I responded to the scene.

CONTACT WITH RESPONDING OFFICER (JAYNE):

Upon arrival, I made contact with Officer Jayne who was the responding officer. Officer Jayne advised he was dispatched to this location in reference to a non-responsive black female. Officer Jayne stated when he arrived to the room, EMS had already arrived and notified the coroner. Officer Jayne stated he entered the room and found the female laying naked on the couch. Officer Jayne stated he secured the scene and started a crime scene log. Officer Jayne advised he spoke with the descendant's husband, DALE KING, who advised VERONICA KING was prone to seizures.

OBSERVATION OF SCENE:

Prior to entering the room or conducting any forensic work, I placed on protective gloves to maintain the forensic integrity. Furthermore, I photographed the scene in its natural state. As I entered the room, I observed a brown cotton upholstery recliner directly in front of the door. To the immediate right of the door, was a matching sofa the female, later identified as VERONICA KING, was laying on. I observed she was unclothed and a towel had been placed over top of her, later determined to have been done by her husband. I observed VERONICA KING had her left leg crossed over top of her right leg that was strait and her right arm and wrist were bent. I observed VERONICA KING had a fresh laceration to the left side of her upper lip that had been bleeding. I also observed a small amount of blood in her nostrils. I observed VERONICA KING had an older bruise, about the size of a quarter, on her right bicep area.

After examining VERONICA KING'S body, I continued to examine the room. I observed a green towel laying on the ground in front of the recliner that appeared to have a small blood spot on it. I also observed a white cloth laying on a coffee table. The green and white towels were collected as evidence. I observed an Ipad sitting on a shelf playing a show and facing VERONICA KING as if she had been watching it. Behind the entry door was a trash can full of empty beer cans as well as an empty beer can box. I observed a small refrigerator in the room which contained more beer and sitting next to it was a liquor bottle about half empty. I observed the bed was unmade and the shower curtain had been rolled up, as if someone may have taken a bath.

After Deputy Coroner Ott arrived he briefly examined VERONICA KING'S body. Deputy Coroner Ott advised he observed what he believed to be petechia around VERONICA KING'S eyes. Upon moving VERONICA KING'S body to the body bag, I observed what appeared to be a friction burn (abrasion) on her lower back.

Deputy Coroner Ott advised he would send VERONICA KING'S body to MUSC for an autopsy to await a cause of death. I cleared with no further action.

Inv. Raley 8714

06/07/17

room. KING stated his clothes were right by the bed and it was the same clothes he had on the day before. KING stated he jumped up, put them on, no socks, barely had his shoes on good, and no hat. KING added the same way we found him within the parking lot.

* I advised KING he took the blanket to cover the body. KING stated he did it for respect for his wife because he went to go get his boss. I stated to KING if I found a loved one not breathing, I would simply run out and call 911 and wouldn't take the time to cover the body. I informed KING that sometimes people will cover a body because they are ashamed of what they did. Approximately 1 hour 57 minutes and 59 seconds (DVD #2 of 3) into interview KING denied committing any crime and begins to smirk. I call him out on his smirking and he puts his head down. Inv. RALEY asked if he was proud of this and denied smiling.

KING stated it was an "accident" that occurred to her and he was sorry.

I questioned KING on what set him off. At this juncture, KING stated he didn't recollect what they were arguing over. KING insisted the only lie he relayed to me was his denial of slapping her. KING would later add that he only slapped her one time. KING stated he did not reposition her legs.

I explained to KING instead of immediately calling 911 to see if she could be resuscitated, he takes the time to get fully clothed, he doesn't utilize a phone within his room, and he takes a blanket to cover her, KING stated it only took about 2 minutes. I questioned KING when he walked over to V. KING's body if he determined if she was dead or if he was uncertain. At approximately 2 hour 49 minutes and 48 seconds he responded he was uncertain. KING stated when he put his ear to her mouth, he needed to go get some help. I pointed out how he got fully dressed and he asked me if I wanted him to exit naked. Inv. RALEY noted most people would pick-up the phone and dial 911; however, KING noted he didn't even think of that. KING added that phone has been broken in his room for so long he didn't even think to utilize such. Inv. RALEY added he walked across the parking lot, which KING denied.

I questioned KING how he would have known she could not have been resuscitated. KING responded he would have had no way of knowing. Approximately 2 hours 6 minutes and 34 seconds (DVD # 2 of 3) I advised there was no sense of urgency to get an ambulance. KING cited he was shocked, hurt, and he needed help and the only person he could think of was his boss. KING added as fast as he could.

Approximately 2 hours 18 minutes and 9 seconds into the interview I question KING if he realizes that killing someone is illegal and he replied with, "yea." I questioned KING if he realizes he can go to jail for killing someone and he replied with, "yes." Furthermore, KING stated he is aware of consequences to his actions if he were to commit a crime (DVD #2 of 3 abruptly stops at 2 hours 28 minutes and 25 seconds due to the memory size).

KING is allotted a break. 2 minutes and 30 seconds I re-enter the interview room. I questioned KING if he wanted to be truthful; however, he insisted upon that he didn't believe he was capable of that. KING did concede he has struck his wife before.

KING was questioned if the sleeping position of V. KING made any sense. KING stated he wasn't really "qualified" to answer that.

Inv. RALEY inquired if it was common for V. KING would get back into the

06/07/17