

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM GREENVILLE COUNTY
JUDGE JOHN C. HAYES, III, CIRCUIT JUDGE
CASES 2016-1927 & 2017-1699

THE STATE,
RESPONDENT,

v.

DEAN ALTON HOLCOMB,
APPELLANT

RECEIVED

JAN 30 2019

SC Court of Appeals

MOTION TO RECUSE JUDGE HILL

APPELLANT MOVES THE COURT FOR THE RECUSAL
OF JUDGE D. GARRISON HILL FOR TWO REASONS:

- 1) HILL REPRESENTED FRED COLLINS & COLLINS
ENTERTAINMENT IN THE "POKER WARS"
FOR WHICH APPELLANT WAS THE MOST
EFFECTIVE OPPONENT. UPON THE DESTRUCTION
OF THE GAMBLING INDUSTRY BOTH HILL
& RUSSELL D. GENT WENT TO "PUBLIC
SERVICE" UPON THE DEATH OF THE
GOLDEN CALF, SO TO SPEAK. - SEE PG. 4 (EX # 1)
IN ATTACHED COPY OF WORKING BRIEF/DRAFT.
- 2) I FILED COMPLAINTS W/ THE OFFICE
OF DISCIPLINARY COUNSEL WHERE I
SHOWED HOW JUDGE HILL COMMITTED

FRAUD UPON THE COURT & APPELLANT.
SEE ATTACHED EXHIBIT #2 &
PAGE 280 OF THE SUPPLEMENTAL RECORD
FOR 2017-1659. NOTE JUDGE HILL
AS A CIRCUIT COURT JUDGE IGNORED
MY PENDING MOTIONS TO PROCEED
PRO SE WITHOUT A HEARING IN
VIOLATION OF FARRETTA V. CALIFORNIA.
JUDGE HILL SHOWS CONTEMPT FOR
APPELLANT'S CONSENT IN THAT HIS
"ORDER FOR SUBSTITUTION OF ← NOT IN
COUNSEL" WAS SIGNED BY HILL THE RECORD,
ON MARCH 16, 2015, FOUR BEFORE THE
DAYS PRIOR TO MY "CONSENT" COURT!!!
WAS OBTAINED TO HAVE PRIVATE
COUNSEL YET A LINE WAS ADDED
RE: SPARTANBURG PUBLIC DEFENDER'S
OFFICE, MERRIAM-WEBSTER'S LAW
DICTIONARY DEFINES PRIVATE AS -
"(b) NOT RELATED TO, CONTROLLED
BY, OR DERIVING FROM THE STATE."

APPELLANT FURTHER MOVES THE
COURT TO RECUSE ANY AND ALL
JUDGES FROM HEARING, DECIDING OR
INFLUENCING THE ABOVE CASES THAT
HAVE EVER WORKED WITH OR FOR

A LAW FIRM OR IN PRIVATE PRACTICE
ANY INTERESTS THAT GENERATED INCOME
FROM THE ILLEGAL LUCRE OF THE NOW
DEFUNCT S.C. GAMBLING INDUSTRY BE
THE CLIENTS OPERATORS OR LOCATIONS.

RESPECTFULLY SUBMITTED,

DR. DEAN A. HOLCOMB
PRO SE
EXECUTIVE DIRECTOR OF
NEW DAWN MINISTRIES

APPELLANT'S STATEMENT ON THE CASES
BEFORE THE APPEALS COURT No. 2016-1927 & 2017-1659

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Appellant was arrested and prosecuted for the above cases with malice and aforethought by a former romantic rival and political opponent in the highest stakes litigation in the history of South Carolina. Greenville County Deputy John Timothy Martin stalked a girlfriend of mine in the late 80's while in uniform and with a patrol cruiser. Complaints were filed with the Sheriff's Office in October 1988 for the stalking and the harassing of Appellant while Martin acted under color of law. Appellant learned after his arrest for 2016-1927 that Martin and Ms. Cole dated some yaers after Appellant's amicable breakup with Ms. Cole. It is a fact that Martin worked as "private security" for Fred Collins and Collins Entertainment while in his GCSO uniform and using the provided cruiser, during the late 80's and 90's and possibly up to or beyond the date of the trials for the above referenced cases. The prosecutor in both cases, Russell D. Ghent (Walker, Todd and Mann) was the public apologist and chief legal counsel for Fred Collins and Collins Entertainment, State v. 192 Coin-Operated Video Games Machines, 338 S.C. 176 (2000), SUPPLEMENTAL RECORD for Case# 2017-1659 pages 308-332, hereafter cited as (Sup.R.p.308-332). According to the Greenville County Public Index Ghent represented Collins Entertainment against Appellant two months after his arrest for case 2016-1927, (Sup. R.p. 338 & 339) Collins Entertainment v. Dean Alton Holcomb, Jr. and New Dawn Ministries, Case# 00CP2300241, Ghent is listed as Plaintiff's attorney updated on 7/19/2013. In State v. Dean Alton Holcomb, Ghent

is listed as solicitor for an arrest date of 5/16/2013. Appellant was Fred Collins, Collins Entertainment and the entire \$3 Billion per year illegal gambling industries loudest and most effective adversary and Ghent was their ~~public apologist and chief legal~~ front-man during the "Poker Wars". See attached "EXAMPLES OF MEDIA COVERAGE FROM THE 'POKER WARS" (Sup. R.p. 363-399).

EXAMPLES OF MEDIA COVERAGE FROM THE "POKER WARS"

Jenny Munre, "Ministry Director seeks judgment against state video poker makers", The Greenville News, 21 May 97

See a copy of the complaint, case#97CP421278 (Sup. R.p.304-307).

"New Dawn Ministries and it's director, Dean Holcomb, Jr. who was in the video gaming business from 1991-93, alleges in the document filed in Spartanburg County Circuit Court that video poker is a form of illegal lottery."

"Video Poker History, The State, 12 Mar 2003

"The amount of money wagered tops \$3 Billion for the fiscal year that ends June 30 (1999)."

Mike Foley, "Anti-gambling activist sues Greenville Businesses", The Greenville News, 15 Nov 97

"Collins however said he is getting tired of Holcomb. There's a law against frivolous lawsuits.' Collins said, 'YOU CAN REST ASSURED WE WON'T TAKE IT LIGHTLY'."

The "WE" Mr. Collins is referring includes his mouthpiece and my prosecutor, Russell D. Ghent. The threat was made real two days later when Appellant was falsely arrested on trumped up charges. The warrant (Sup. R.p. 400) states in part, " The DEFENDANT DID PLAN AND CARRY OUT THE CRIME OF FORGERY BY THE USE OF CODEFENDANTS DID CASH \$205 IN BOGUS POKER MACHINE PAYOFFFTICKETS AND DID RECIEVE MONIES FOR THE BOGUS PAPERS."

The case was dismissed due to "Insufficient evidence to convict", ie NO BOGUS TICKETS. (Sup. R.p.401)

The entire gaming industry in SC was engaged in RICO and was ignored by state and local law enforcement due to the corrupting influence filthy lucre in this volume produces. Going back to "The Video Poker History" cited above states "THE VIDEO GAME MACHINE ACT BECOMES EFFECTIVE JULY!1. LIMITS PAYOUTS TO \$125 PER PLAYER PER DAY..."

The Appellant along with a handful of volunteers and Carolina Family Alliance spent years setting up the first gambler anonymous meetings and 24 hour crisis phone lines. And also video taped the criminal enterprise(s) of violations of the VGM Act by pretending to play the video poker machines by depositing and cashing out over \$125 throughout the state. This fact is memorialized in the following articles (2):

Also see Collins Entertainment Corp. v. 20 20, Court of Appeals Case# 2954 (March 8, 1999)

Russell D. Ghent, "Collins' lawyer says editorial false, misleads Letter to the Editor, The Greenville News, 22 Oct 98

Andrea Wiegl, "Beasley to drop suit against video poker operators The Greenville News, 12 Nov 98

"Collins attorney, Russell Ghent said, 'They started this fight and Collins Entertainment will finish it.'"

Here Ghent made a false statement. Appellant started this fight and it is yet to be seen 'who will finish it.'"

AP, "Suit may open video poker to RICO", The Index-Journal, 7 Dec 98.

"Judge Joe Anderson could rule that luring players with jackpots larger than the \$125 limit amounts to racketeering under federal law."

AP, "Collins: Video Poker too big to destroy", 24 May 99

"All the king's horses and all the king's men can't put it out of business," Greenville Businessman Fred Collins said Saturday night."

"Collins said he expects U.S. District Judge Joe Anderson to try to have him jailed. Anderson has ordered Collins and the other operators to comply with state laws' s \$125 dollar-per-day winning limit (From the VGM Act 5 years prior) or face contempt charges."

"I don't like being walked on. I'll fight anything"-Collins

"The governor is using me for 2000. He's not my boy."-Collins

David Firestone, "South Carolina High Court derails video poker games", The New York Times, 15 Oct 99

All articles above available in the SUPPLEMENTAL RECORD pages 363-399.

→ ADD COLLINS OBITUARY

"COURTHOUSE COLLINS"

SEMINARS ON HOW TO USE LAWYERS!

JANUARY 22, 2019

THE HONORABLE JERNY KITCHINGS
CLERK, SC COURT OF APPEALS
P. O. Box 11629
COLUMBIA, SC 29211

RECEIVED
JAN 30 2019
SC Court of Appeals

RE: MOTION TO RECUSE JUDGE HILL
CASES # 2016-1927 & 2017-7659

DEAR MS. KITCHINGS:

PLEASE STAMP & COPY THE ATTACHED
MOTION & 2 EXHIBITS (7 PAGES TOTAL).

TYGER RIVER IS ON LOCKDOWN. I HAVE
LITTLE ACCESS TO PAPER, STAMPS, ETC.

ALSO SCDC DOES NOT PROVIDE COPY SERVICE
FOR HAND DRAFTED DOCUMENTS. MY TYPE-
WRITER IS OUT OF CARTRIDGES (SP?)

I HAVE A DOZEN ON ORDER BUT WAITING.
I ASK YOU TO PLEASE SEND ME STAMPED
COPIES OF THIS LETTER, MOTION & EXHIBITS
FOR MY RECORDS. AS THIS GAME MOVES, I
EXPECT TO ^{BE} BEFORE THE COURT IN RICHMOND,
VA IN THESE MATTERS. I FURTHER ASK
THAT YOU FORWARD THE STATE AND THE
INDOLENT-INDIGENT DEFENSE COUNSEL
COPIES AS WELL. THANKING YOU IN
ADVANCE. AS I REMAIN INDOMITABLE

JH

DR. DEAN A. HALCAMP
POLITICAL PRISONER #369696
TYGER RIVER CI
200 PRISON ROAD, UNIT 11-224
ENOREE SC 29335

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JAN 30 2019
SC Court of Appeals



SCDC
Christmas
Packet

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TYRGI MAILROOM

S.C. APPEALS COURT
P.O. BOX 11629
COLUMBIA, SC 29211

LEGAL MAIL

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