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

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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. GHENT 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 COUNSEL" WAS SIGNED BY HILL ON MARCH 16, 2015, FOUR DAYS PRIOR TO MY "CONSENT" 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."

← NOT IN THE RECORDS BEFORE THE COURT.!!!

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

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APPELLANT'S STATEMENT ON THE CASES

BEFORE THE APPEALS COURT No. 2016-1927 & 2017-1659

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 Ganes Machines, 338 S.C. 176 (2000), SUPPLEMANTAL 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 industies 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 judgnent against state video poker makers", The Greenville News, 21 May 97

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

"New Dawn Ministries and it's director, Dean Holconb, Jr. who was in the video gaming business fron 1991-93, alleges in the document filed in Spartanburg County Circuit Court that video poker is a forn 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 Holconb. There's a law against frivolous lawsuits.' Collins said, 'YOU CAN REST ASSURED WE WON"T TAKE IT LIGHTLY".

The "WE" Mr. Collins is refering includes his mouthpiece and ny prosector, 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 dimissed 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 anonynous 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 menorialized 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 govenor is using me for 2000. He's not my boy."-Collins

David Firestone, "South Carolina High Court derails video poker games", The New York Tines, 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!

13-5223

STATE OF SOUTH CAROLINA COUNTY OF GREENVILLE	THE COURT OF GENERAL SESSIONS FOR THE 13TH JUDICIAL CIRCUIT
State of South Carolina Plaintiff, v. Dean Alton Holcomb Defendant.	Ticket Nos.: 2013A2330202932 2014A2330207245 2014A2330207246 **ORDER FOR SUBSTITUTION OF COUNSEL**

IT IS ORDERED that John Crangle, Esq. will no longer represent the Defendant in the above-captioned action and that the Spartanburg County Public Defender will be substituted as new counsel of record for Defendant.

IT IS SO ORDERED.

D. Garrison Hill
Circuit Judge

March 12, 2015
Greenville, South Carolina

cc: Solicitor Barry Barnette, Esq.

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 & 2017-1659

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 INDOCENT - INDIGENT DEFENSE COUNSEL COPIES AS WELL. THANKING YOU IN ADVANCE. AS I REMAIN INDOMITABLE

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

SCDC Christmas Packet

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