PETITION FOR A WRIT OF CERTIORARI TO THE COURT OF APPEALS

THE STATE OF SOUTH CAROLINA
In The Supreme Court

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S.C. SUPREME COURT

APPEAL FROM THE ADMINISTRATIVE LAW COURT

Honorable Ralph K. Anderson, III, Chief Administrative Law Judge

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Op. No. 6021 (S.C. Ct. App. filed Nov. 18, 2023)
Case No. 2023-001750

STEWART BUCHANAN, ... PETITIONER,

v.

S.C. DEP'T PROB., PAROLE & PARDON SERVS., ... RESPONDENT.

REPLY TO RETURN TO PETITION FOR A WRIT OF CERTIORARI

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ARGUMENTS IN REPLY

I. The current procedural framework of parole cases is not sufficient to safeguard the due process rights of anyone who comes before the Board.

a. The Board's hearing procedures deny potential parolees a meaningful opportunity to be heard.

The "essence" of Petitioner's argument is not that "he wants parole and didn't get it," Return at 14, but rather that the Board's procedures violate his due process rights. Pet. for Writ of Certiorari at 14. Potential parolees are entitled to the protections of due process to ensure that they receive a meaningful parole hearing at which the Board follows proper procedure. *Cooper v. S.C. Dep't of Prob., Parole & Pardon Servs.*, 377 S.C. 489, 661 S.E.2d 106 (2008). "The fundamental requirement of due process is the opportunity to be heard at a meaningful time and in a meaningful manner," *Mathews v. Eldridge*, 424 U.S. 319, 333 (1976) (quoting *Armstrong v. Manzo*, 380 U.S. 545, 552 (1965)), and the Board's hearing procedures do not provide any inmate with such an opportunity. While the Board's procedures are especially problematic for juveniles, who are entitled to extra protection, the bottom line is that the Board's procedures are not sufficient to safeguard due process rights for *anybody* who comes before it.

Contrary to Respondent's assertions, *see* Return at 15, the Court of Appeals' description of the parole hearing process as "perfunctory" was exactly correct. The average parole hearing lasts roughly two to four minutes and perhaps five to ten for the very few inmates who are represented by counsel. The information the Board has before it at any given hearing includes (1) PPP's file, which includes extrajudicial information such as news articles, incident reports, statements from any law enforcement officer or solicitor who wished to submit one, and even false information that the inmate is not allowed to see or correct,[1] and (2) the first twenty pages (in

[1] Concerningly, Respondent has also repeatedly taken the position that the Parole Board is allowed to consider *any information*, even demonstrably false information, that is provided to it by victims,

theory) of any material that the inmate submitted to the Board at least three weeks in advance of his hearing. The Chairperson of the Board typically opens the hearing by asking the inmate what he has done to prepare for parole, and the inmate will generally have one minute or less to make his case to the Board. Follow-up questions are rarely asked. If the inmate has counsel or family support, each may be invited to make a brief statement at the Board's discretion. However, the Board will regularly interrupt and cut off both inmates and their supporters, or ask attorneys to

solicitors, or PPP itself. *See, e.g.*, Br. of Resp't, *Cooper v. SCDPPPS*, No. 23-ALJ-15-0014 (S.C. Admin. L. Ct. Sept. 29, 2023) (arguing that PPP is not obligated to allow a potential parolee to correct demonstrably false statements made to the Board by parole opponents directly concerning the sole factor on which the Board denied parole, and noting that "an alleged 'factual inaccuracy' may . . . be simply a different perspective, perception, experience, or based on information that may not have even been introduced at trial."); Br. of Resp't, *Blackwell v. SCDPPPS*, No. 2021-001162, at 17–18 (S.C. Ct. App. July 18, 2022) (where a solicitor presented false information to the Board that had been affirmatively refuted by a SLED investigation and report, arguing that PPP was correct in both providing the solicitor's false statement to the Board anyway and cautioning the Board to view the SLED report with skepticism). *Cf. Tinsley v. S.C. Dep't of Prob., Parole & Pardon Servs.*, Op. No. 2016-UP-163, at *3 (S.C. Ct. App. 2016) (holding that the ALC has jurisdiction to consider whether the Board used inaccurate information as a basis to deny Tinsley parole because consideration of such information would be improper procedure and thus violate due process). This is especially troubling in light of the fact that PPP readily acknowledges that it neither checks information that the Board receives for accuracy nor provides inmates with a remedy if false information bears on the Board's parole denial. Br. of Resp't, *Cooper*, No. 23-ALJ-15-0014, at 10; Br. of Resp't, *Blackwell*, No. 2021-001162, at 15. To make matters worse, the Board also cuts off inmates if they attempt to correct any misinformation that they think the Board might have about their offense, based on its policy that inmates should not be allowed to discuss the facts of their case (often the sole reason for denial) at their hearings. PPP justifies its insistence that false information must be allowed to infect the Board's parole decisions on the grounds that Board members must be treated in the same way as sentencing judges, who, PPP argues, "may conduct an inquiry broad in scope, largely unlimited either as to the kind of information [they] may consider, or the source from which it may come." Br. of Resp't, *Cooper*, No. 23-ALJ-15-0014, at 9. Notwithstanding the fact that Board members are not judges and have no authority to determine an inmate's sentence, judges, of course, are not allowed to consider false information either. *State v. Franklin*, 267 S.C. 240, 246, 226 S.E.2d 896, 898 (1976) ("a sentence cannot be predicated on false information") (citing *Townsend v. Burke*, 334 U.S. 736 (1948)).

wrap up their advocacy in the interest of time.[2] Most hearings end without any Board members besides the Chairperson posing a single question to the inmate, his counsel, or his supporters.

Respondent contends that this process is necessarily cursory due to time constraints, Return at 15, but the Board's treatment of witnesses in opposition to parole reveals otherwise. After the inmate pleads his case (or however much of it he is able to plead before the Board cuts him off), he is removed from the hearing room for the Board to hear opposition testimony from victims. This testimony can include anyone who self-identifies as a victim, including law enforcement officers, solicitors, or members of the community with no connection to the case. Opposition witnesses speak for as long as they wish and are rarely, if ever, interrupted or cut off by any Board member.[3] Even if time constraints were a compelling interest for the Board—and its treatment of parole opponents clearly demonstrates that they are not—due process requires that inmates be given the same courtesies in presenting their cases that are extended to any witnesses seeking to keep the inmate in prison. *See Mathews*, 424 U.S. at 333.

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[2] *See, e.g.*, *Justice v. State*, Op. No. 28183 (S.C. Dec. 13, 2023). The procedures at revocation hearings with which this Court noted concern in *Justice*—the Board's interruption of and refusal to listen to inmates, its contrasting willingness to hear at length from anyone opposing the inmate, and the complete lack of opportunity for the inmate to confront either witnesses against him or any information that PPP provides to the parole board—are also commonplace at parole hearings, which take place before the same Board. S.C. Board of Paroles and Pardons Policy and Procedure Manual at 10 (Nov. 2019), https://www.scstatehouse.gov/CommitteeInfo/HouseLegislativeOversightCommittee/AgencyWebpages/ProbationParoleandPardon/Parole%20Board%20Manual.pdf.

[3] Undersigned counsel combined has attended and/or listened to hundreds, if not thousands, of parole hearings and has never encountered a hearing in which the Board cut off a witness in opposition, while cutting off inmates or their supporters is a regular occurrence. Importantly, Petitioner does not contend that the Board should interrupt opposing witnesses but rather that it must extend the same courtesy to inmates and their supporters.

b. The current legal framework governing parole cases allows the Parole Board to skirt the due process requirements of Cooper *by permanently denying inmates parole with no opportunity for judicial review.*

Respondent relies heavily on both *Cooper v. S.C. Dep't of Prob., Parole & Pardon Servs.*, 377 S.C. 489, 661 S.E.2d 106 (2008), and *Compton v. S.C. Dep't of Prob., Parole & Pardon Servs.*, 385 S.C. 476, 685 S.E.2d 175 (2009), to argue that the Board's decisions cannot possibly implicate a state-created liberty interest—and thus are wholly immune from judicial scrutiny—as long as the Board includes a single boilerplate sentence in its denial letter stating that it considered the requisite factors of § 24-21-640 and Form 1212. Return at 13–15. This assertion is incorrect in light of both the principles of judicial review, discussed further below, and the due process requirements of *Cooper* itself.

The Parole Board has adopted its now-standard practice of routinely denying inmates on the sole basis of the nature and circumstances of their offenses and copying and pasting the same boilerplate sentence into every denial letter in accordance in line with its interpretation that by doing so *Compton* precludes judicial scrutiny of the underlying decision. However, if this interpretation were correct, *Cooper* would be rendered meaningless. This clearly contravenes the *Compton* Court's intent, as evidenced by the fact that it could easily have overruled *Cooper* in *Compton* and chose not to. Thus, even after *Compton*, *Cooper*'s due process requirements still stand, and where the facts of the case clearly demonstrate that the Board has failed to "consider" or "give credence" to the requisite factors, regardless of whether it has provided a rote citation to one of the factors, the Board's decision cannot constitute a routine denial of parole and thus be immune from judicial review. *See Cooper*, 377 S.C. at 499, 661 S.E.2d at 111–12. Otherwise, potential parolees would have no administrative avenue through which to remedy violations of

their due process rights, even where, as here, it appears that the Board has not considered or applied the criteria.[4]

The Court of Appeals correctly recognized that repeated denials of parole based on nothing but the nature and circumstances of the inmate's offense renders inmates "very nearly equivalent to being ineligible for parole." App 471. In other words, permitting the Board to deny parole repeatedly and consistently on the sole basis of the offense deprives inmates of exactly what *Cooper* promised: a meaningful opportunity to be released on parole. *Cooper*, 377 S.C. at 493, 661 S.E.2d at 108. Further, whenever a decision-maker is required to consider a set of legally prescribed criteria, it is not sufficient for the decision-maker to merely state that the criteria has been considered—it must show that it has applied the criteria to the facts of the case. *State v. Mack*, Op. No. 6031 (S.C. Ct. App. Nov. 1, 2023) (holding that applying a set of legally mandated factors "involves more than repeating the words; it requires applying the substantive content of the factors"). Therefore, such conclusory denials, unsupported by any articulated reasoning, violate due process and are not routine denials of parole.

This Court has the opportunity to remedy past and future violations of *Cooper*'s due process requirement in a number of ways. First, and most importantly, this Court can require the Board to satisfy more stringent requirements in denying parole, particularly when it seeks to deny parole to inmates with exceptional institutional records on the sole basis of the nature and circumstances of their offenses. The Court can require the Board to conduct a more searching review of each individual parole case and issue specific, individualized findings of fact with

[4] Upon a comparison of Mr. Buchanan's denial letters from both before and after *Cooper* was decided, App. 307–24, it is clear that in its attempt to comply with *Cooper*, the Board merely substituted one rote, boilerplate sentence for another. There is no evidence other than that one sentence that the Board has actually applied the requisite factors to Mr. Buchanan's case.

reference to the specific facts of an inmate's case—not unlike a court decision.[5] Specifically, the Board should be required to identify, in addition to the criteria on which they rely to deny parole, the precise reasons why those criteria outweigh any evidence of rehabilitation and release-readiness presented by the inmate.[6]

Similarly, the Court has the option to establish that a denial of parole to inmates with an exceptional institutional record on the sole basis of the nature and circumstances of their offense does not constitute a routine denial of parole, and thus, is reviewable by the ALC. *Furtick*, 352 S.C. at 596, 576 S.E.2d at 147. Under the current legal framework, the Board is permitted to make a unilateral determination that the nature of a parole-eligible inmate's offense should have rendered him parole-ineligible, and thus permanently deny parole simply by citing the nature and circumstances of the offense as the reason for denial. This Court can ensure that the Board is held judicially accountable for arbitrary and capricious decisions that violate due process by establishing that parole denials based only on the nature of the offense, with no further justification, are not "routine." Finally, as discussed further in Section II, *infra*, this Court also has the opportunity to delineate specialized parole procedures for juvenile offenders.

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[5] In PPP's view, "[t]he Parole Board sits in a quasi-judicial capacity." *See* Br. of Resp't, *Blackwell*, No. 2021-001162, at 16. Even assuming without conceding that this argument is correct, and putting aside any separation of powers implications that might arise when an executive agency attempts to perform a judicial function, it is reasonable to require quasi-judicial factfinders to make explicit, individualized findings of fact that are unique to each case that comes before them, in the same way that judges do.

[6] Such a requirement would also comport with the mandate of the Administrative Procedures Act (APA), which governs parole decisions and their appeals. The APA provides that a final decision in an agency adjudication of a contested case "shall include findings of fact and conclusions of law, separately stated. Findings of fact, if set forth in statutory language, shall be accompanied by a concise and explicit statement of the underlying facts supporting the findings." S.C. Code Ann. § 1-23-350.

Respondent argues that the Court has no choice but to let these willful due process violations continue and allow the Legislature to reform the Board if necessary. Respondent's position is that the Board is an unassailable, unreviewable authority on all things parole. Return at 16. That is simply not true. While the General Assembly is certainly capable of legislating new parole procedures—and indeed, the Court of Appeals encouraged it to do so, App. 472—this Court is equally well-suited to remedy the Board's repeated violations of state and constitutional law. S.C. Code §§ 1-23-380, 390 (establishing procedures for judicial review of agency action, including by this Court). PPP is an executive agency. See S.C. Code Ann. § 24-21-10(A); see also id. § 1-23-10(1) (defining "Agency" and "State agency"). Because PPP is an agency, and because parole determinations constitute agency action, "an inmate may seek review of [PPP's] final decision in an administrative matter under the APA." *Al-Shabazz v. State*, 338 S.C. 354, 369, 527 S.E.2d 742, 750 (2000).

It is the province of this Court to determine whether PPP or the Board is properly exercising the authority granted it by the Legislature and complying with the law as the Court itself has interpreted it. The Board is neither immune from judicial scrutiny nor subject to a special set of rules simply because its expertise lies in parole decisions. This Court has previously remedied the Board's and PPP's abuses of power, and given that both bodies continue to flout the Court's clear directives, specifically those from *Cooper*, it can do so again. *See, e.g.*, *Rose v. S.C. Dep't of Probation, Parole & Pardon Servs.*, 429 S.C. 136,143, 838 S.E.2d 505, 509 (2020) (rejecting PPP's claim that it properly denied parole to an inmate who had received the requisite number of votes and had presented affidavits to that effect, rejecting PPP's unsupported assertion that it properly denied the inmate parole simply because it had no evidence of the vote count in its own records, and remanding to PPP "to determine Rose's parole conditions"); *Barton v. S.C. Dep't of*

Probation Parole & Pardon Servs., 404 S.C. 395, 745 S.E.2d 110 (2013) (correcting PPP's erroneous retroactive application of S.C. Code § 24-21-645 as an *ex post facto* violation in order to safeguard "an inmate's substantial personal right to statutorily correct parole review," rejecting PPP's interpretation of § 24-21-645 because it would "invite[] absurd results," and remanding for the appellant to be granted parole); *Cooper v. S.C. Dep't of Probation, Parole & Pardon Servs.*, 377 S.C. 489, 661 S.E.2d 106 (2008) (rejecting PPP's interpretation of § 24-21-640, establishing that inmates have a right to procedural due process at parole hearings and the Board must adhere to constitutional standards, and explaining that the Board is subject to reversal if its final decision does not "include findings of fact and conclusions of law, separately stated," or if the findings of fact are not "accompanied by a concise and explicit statement of the underlying facts supporting the findings" (quoting S.C. Code Ann. § 1-23-350)). Contrary to Respondent's argument and to state law, the Court is not required to stand idly by while the Board (enabled by PPP) repeatedly violates due process and the APA. *Cf.* Return at 14 (incorrectly asserting that review of the Board's procedures is "a role that Respondent respectfully submits the judicial branch does not have").

II. The jurisprudence from this Court and the United States Supreme Court clearly establish that juveniles have significant constitutional interests which are not being adequately safeguarded by the current procedural framework of the Board.

a. Currently-existing case law makes clear that the Board is required to adhere to constitutional protections for juveniles.

Respondent incorrectly contends both that the trend towards granting protections for juveniles in the criminal system is reversing and that Petitioner's argument depends on "some inevitability that the Supreme Court will someday change the rules for inmates being considered for parole." Return at 7. To the contrary, Petitioner is not asking this Court to change the rules or to expand the rights that the United States Supreme Court has already established for juveniles—he is simply asking this Court to require that PPP comply with the rules that are already in place.

As set forth more fully in the Petition, both the United States and South Carolina Supreme Courts have established that the mitigating factors of youth are information that a decision-maker is legally mandated to consider when making a determination about the length of a juvenile's incarceration. Because Stewart was sentenced before these protections were established, this has never happened in his case. No state official with the power to confine or release Stewart has ever taken these principles and the *Aiken* factors into account in assessing whether and when Stewart should be released from confinement. Thus, Stewart is now asking the Court to require that Respondent comply with *Roper*, *Graham*, *Miller*, and *Aiken* by affording Stewart the protections that the Supreme Court has already mandated. Specifically, when the Board is the sole decision-maker regarding the continued detention of a juvenile sentenced prior to *Roper*, *Graham*, *Miller*, and *Aiken*, the Board must consider the mitigating factors of youth, as articulated in *Aiken*, when determining whether the juvenile should be paroled.

b. Other states across the country have applied Miller *and its progeny in the parole context.*

Contrary to Respondent's argument that *Aiken* and *Miller* apply only to sentencing and not parole, the United States Supreme Court has made clear that sentencing and parole are not mutually exclusive proceedings. *Montgomery v. Louisiana* recognized that "[p]rotection against disproportionate punishment is the central substantive guarantee of the Eighth Amendment and goes far beyond the manner of determining a defendant's sentence." 577 U.S. 190, 206 (2016) (citations omitted). The *Montgomery* Court clarified that one way states could give effect to the constitutional proportionality considerations afforded to juveniles was to create a meaningful "opportunity for release" by providing them parole proceedings where juveniles could present evidence related to their juvenility and "*Miller*'s central intuition—that children who commit even heinous crimes are capable of change." *Id.* at 212.

Following *Miller* and *Montgomery*, other states across the county have applied *Miller* and its progeny in the parole context. Several states have articulated statutory parole considerations for individuals who were juveniles at the time of their offense to ensure that their constitutional interests are given proper procedural and substantive effect in parole proceedings. *E.g.*, Cal. Penal Code § 3051; Il. St. § 5-4.5-115; La. Rev. Stat. § 15:574.4(J); Md. Code Reg. 12.08.01.18 A.(3)–(5);[7] Mo. Rev. Stat. § 558.047;[8] Ohio Rev. Code § 2967.132(E)(2); Or. Rev. Stat. § 144.397(5)–

[7] For example, Maryland's parole statute requires the Parole Commission to consider unique factors about the mitigating factors of youth for all juvenile offenders, regardless of the underlying conviction. These factors include the offender's age at the time of the offense, his level of maturity and sense of responsibility at the time of the crime, how influence or peer pressure played a role, whether the individual's subsequent character development indicates he will comply with conditions of release, his home and family environment at the time of the offense, his educational background and achievement at the time of the offense, and any other factors or circumstances unique to prisoners who committed crimes at the time the individual was a juvenile that the Commissioner determines are relevant. Md. Code Reg. 12.08.01.18 A.(4). If the juvenile offender is sentenced to a paroleable life sentence, the Commission "shall consider whether the inmate has adequately demonstrated maturity and rehabilitation since commission of the crime." Md. Code Reg. 12.08.01.18 A.(3). The Commission is directed to consider thirteen different kinds of information in exploring these factors about juvenility. Md. Code Reg. 12.08.01.18 A(5).

[8] Missouri provides unique parole considerations for individuals who were sentenced to life for offenses committed as a juvenile before August 18, 2016 or for first degree murder convictions after August 28, 20216. Mo. Rev. Stat. § 558.047(1). For these offenders, the parole board has to consider five additional factors unique to juvenile offenders, along with the regular factors considered for all potential adult parolees. These factors are:

> (1) Efforts made toward rehabilitation since the offense or offenses occurred, including participation in educational, vocational, or other programs during incarceration, when available; (2) The subsequent growth and increased maturity of the person since the offense or offenses occurred; (3) Evidence that the person has accepted accountability for the offense or offenses, except in cases where the person has maintained his or her innocence; (4) The person's institutional record during incarceration; and (5) Whether the person remains the same risk to society as he or she did at the time of the initial sentencing.

Mo. Rev. Stat. § 558.047 (5).

(7).[9] Courts have also recognized that adult parole proceedings are insufficient to adequately protect juveniles' liberty interests.[10]

[9] In Oregon, all juvenile offenders are parole eligible after serving fifteen years, regardless of the length of their sentence or any other mandatory sentence provisions the individual might have been sentenced under. Or. Rev. Stat. § 144.397 (1)–(2). The Oregon parole board is required to hold a hearing for these offenders that "must provide the person a meaningful opportunity to be released on parole or post-prison supervision." Or. Rev. Stat. § 144.397(3). During these parole hearings for juvenile offenders, the board must "consider and give substantial weight to the fact that a person under 18 years of age is incapable of the same reasoning and impulse control as an adult and the diminished culpability of minors as compared to that of adults." Or. Rev. Stat. § 144.397(5). In doing so, the board has to consider seven factors relevant to juvenility, including the offender's "age and immaturity" and "subsequent emotional growth and increased maturity," whether an adult was involved in the offense, "the person's family and community circumstances at the time of the offense, including any history of abuse, trauma and involvement in the juvenile dependency system," participation in rehabilitative programming, and any other factors presented by the juvenile. *Id.* The board is further directed that the age of the person can in no way be considered as an aggravating factor in these hearings. Or. Rev. Stat. § 144.397(6).

[10] *See Hayden v. Keller*, 134 F. Supp. 3d 1000, 1009 (E.D.N.C. 2015) ("In the case before this court, it is evident that North Carolina has implemented a parole system which wholly fails to provide Hayden with any "meaningful opportunity" to make his case for parole. The commissioners and their case analysts do not distinguish parole reviews for juvenile offenders from adult offenders, and thus fail to consider "children's diminished culpability and heightened capacity for change" in their parole reviews."); *Greiman v. Hodges*, 79 F. Supp. 3d 933, 943–45 (S.D. Iowa 2015) (recognizing that "the responsibility for ensuring that Plaintiff receives his constitutionally mandated "meaningful opportunity to obtain release based on demonstrated maturity and rehabilitation" lies squarely" with the Iowa Board of Parole, applying the regular adult parole criteria would be insufficient because "[*Graham*] does provide the juvenile offender with substantially more than a possibility of parole . . . it creates a categorical entitlement to "demonstrate maturity and reform," to show that "he is fit to rejoin society," and to have a "meaningful opportunity for release."); *Flores v. Stanford*, 2019 U.S. Dist. LEXIS 160992, at *28 (same); *Deal v. Mass. Parole Bd.*, 142 N.E.3d 77, 81–82 (Mass. 2020) (recognizing that parole decisions for juveniles must be considered differently because, "[u]nlike adult offenders, juveniles have diminished culpability and greater prospects for reform," and requiring not only consideration of the *Miller* factors in parole hearings for juvenile homicide offenders but providing other protective review including articulated written findings on the *Miller* factors, access to counsel in parole hearings, and allowing for judicial review of juvenile parole denials); *Office of the Prosecuting Atty. v. Precythe*, 14 F.4th 808, 817–19 (8th Cir. 2021) (recognizing that simply providing juvenile offenders parole proceedings "remedies the violation only to the extent that doing so ensures that juveniles whose crimes reflected only transient immaturity—and who have since matured—will not be forced to serve a disproportionate sentence. . . . If [a state] chooses this route to remedy Plaintiffs' constitutional injuries, the parole review process must take into account the unique considerations of juvenile offenders.").

CONCLUSION

For the reasons set forth above, as well as the reasons more fully presented in Stewart's Petition for Writ of Certiorari, this Court should grant certiorari to remedy the constitutional defects in the Parole Board's procedures, which allow the Board to skirt due process requirements for juvenile offenders and effectively permanently deny parole without in fact considering the requisite criteria of S.C. Code § 24-21-640, Form 1212, and *Aiken v. Byars*.

Respectfully submitted,

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