

STATE OF SOUTH CAROLINA

In the Court of Appeals

APPEAL FROM THE SOUTH CAROLINA ADMINISTRATIVE LAW COURT
The Honorable Robert L. Reibold, Administrative Law Judge

Case No. 25-ALJ-04-0162-AP
(Appellate Case No. 2025-001744)

Christopher Santiago, #304243,

Appellant,

v.

South Carolina Department of Corrections

Respondent.

FINAL BRIEF OF APPELLANT

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SC Court of Appeals

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STATEMENT OF ISSUES ON APPEAL

1. This Court has previously ruled that inmates have a protected property interest in their prison accounts. Santiago's grievance concerned SCDC's removal of funds from his inmate trust account and SCDC's refusal to refund the money from the tablet accounts into which those funds were placed. But the ALC dismissed Santiago's appeal and stated that his claims did not implicate a state-created property interest. Did the ALC err in dismissing Santiago's appeal on this basis?

2. The ALC's Order Granting Motion to Dismiss contains many errors, inaccuracies, and misstatements of fact to which it attempts to apply the law. Is the ALC's Order "clearly erroneous" under S.C. Code § 1-23-610(e)?

3. Did the ALC err in stating that the issues Santiago raised in his administrative appeal were not preserved for review?

STATEMENT OF THE CASE

Appellant Christopher Santiago, an inmate incarcerated in the South Carolina Department of Corrections ("SCDC" or "Department") appeals an Order Granting Motion to Dismiss ("Order") from the South Carolina Administrative Law Court ("ALC"). The Order was issued by the Honorable Administrative Law Judge Robert L. Reibold on August 20, 2025, in the case: Santiago v. S.C. Dep't of Corr., 25-ALJ-04-0162-AP (S.C. Admin. Law Ct. Aug. 20, 2025).

I. History of proceedings

A. Santiago's first grievance

On October 3, 2024, Santiago submitted a Step One Grievance (No. KCI-0604-24) to Respondent SCDC. That grievance ultimately led to a February 18, 2025, order by the Honorable Administrative Law Judge Crystal M. Rookard remanding the matter to SCDC "for it to proceed through the two-step grievance system." Santiago v. S.C. Dep't of Corr., 24-ALJ-04-0701-IJ (S.C. Admin. Law Ct., Feb. 18, 2025).

B. Santiago's second grievance

Following remand, on March 5, 2025, Santiago submitted a new Step One Grievance (No. KCI-0141-25) to SCDC. In his new grievance, Santiago reported that another inmate had exploited security flaws in the prison tablet software to crack Santiago's PIN, access Santiago's account, and place a fraudulent order for \$420 to be sent from Santiago's inmate trust account to Santiago's Tablet Time and Phone Debit Viapath accounts. Santiago further stated that SCDC had removed the money from his inmate trust account and that SCDC had refused his request for a refund. His grievance asked SCDC to refund the money to his inmate trust account and to fix the software security flaws that enable PIN cracking and fraudulent orders.

On March 20, 2025, SCDC used the bottom half of a Step Two Grievance form, confusingly numbered "KCI-0604-24" to deny Santiago's grievance numbered "KCI-0141-25." (See Facts section of this brief for clarification of this issue.) This was the Department's final decision.

C. Appeal to the ALC, dismissal, and Notice of Appeal

On April 3, 2025, Santiago filed a Notice of Appeal to the ALC. The case was assigned to the Honorable Robert L. Reibold on April 10, 2025. On July 1, 2025, SCDC filed a Motion to Dismiss, arguing that Santiago's grievance did not implicate a state-created property interest. On July 9, 2025, Santiago filed a Response in opposition, arguing that his grievance implicated a property interest in his inmate trust account. On August 20, 2025, the ALC issued an Order Granting Motion to Dismiss, in which it stated, "Because the Court concludes that Appellant's claims do not implicate state-created property interests, summary dismissal is appropriate." (R. p. 25, lines 26-27) Santiago v. S.C. Dep't of Corr., 25-ALJ-04-0162-AP (S.C. Admin. Law Ct., Aug. 20, 2025).

On August 27, 2025, Santiago mailed a Notice of Appeal to the South Carolina Court of Appeals and served copies to SCDC's Office of General Counsel and the ALC's Clerk of Court.

STANDARD OF REVIEW

Section 1-23-610 of the South Carolina Code sets forth the standard of review when the Court of Appeals is sitting in review of a decision by the ALC on an appeal from an administrative agency. "In an appeal from an ALC decision, the Administrative Procedures Act provides the appropriate standard of review." Kiawah Dev. Partners, II v. S.C. Dep't of Health &

Env't Control, 411 S.C. 16, 28, 766 S.E.2d 707, 715 (2014).

"Section 1-23-610 of the South Carolina Code [] sets forth the standard of review when the Court of Appeals is sitting in review of an appeal from an administrative agency." S.C. Dep't of Corr. v. Mitchell, 377 S.C. 256, 258, 659 S.E.2d 233, 234 (Ct. App. 2008).

FACTS

I. Background

At the outset, we should provide the Court with some background regarding prison tablets in SCDC.

A. Viapath tablets enable statewide identity fraud in SCDC.

SCDC provides people in its custody with electronic tablets from prison telecom Viapath Technologies (formerly known as Global Tel*Link). The tablets are essentially small, imitation iPads that lack internet access. They allow incarcerated people to transfer money from their inmate trust accounts to Viapath "Tablet Time" and "Phone Debit" accounts. The funds in the Tablet Time and Phone Debit accounts can then be used to buy entertainment subscriptions, messages, and phone calls.

But there's a problem. An app on the tablets, called "Genesis" (also called "GTL Services" and "mail/requests/docs"), contains a security flaw that inmates can exploit to gain unauthorized access to other inmates' accounts. Once a fraudster gains access to a victim's account, he or she can use

the Genesis app to place unauthorized orders for funds to be moved from the victim's inmate trust fund to the victim's Tablet Time and Phone Debit accounts, knowing that SCDC will not move the money back. This problem affects all SCDC inmates.

B. What is the security flaw in the Genesis app?

Basically anyone using a tablet connected to the Viapath network can exploit the security flaw. All that is required to access another inmate's account using the Genesis app is the person's six-digit SCDC inmate ID number, which is printed on their uniforms and ID card; and their 4-digit PIN. The 4-digit PIN can be discovered by repeatedly attempting to log in to the Genesis app using every possible four-digit number combination (e.g., 0001, 0002, 0003, ...) until the correct PIN is entered.

It's normal for software to guard against this method of PIN cracking by requiring multifactor authentication or by limiting the number of allowed login attempts using incorrect PINs. ATMs, for instance, typically allow five login attempts before locking an account. See, e.g., Arias v. Frauenheim, 2017 WL 7000270 at *2 (C.D. Cal., Nov. 13, 2017) (Petitioner made eight attempts to withdraw money from another person's ATM card. "Petitioner's first five attempts to withdraw money failed because petitioner [REDACTED] [REDACTED] used an incorrect personal identification number (PIN). The sixth attempt failed because petitioner had made too many attempts to access the account with

an incorrect PIN. The seventh and eighth attempts failed because the bank had blocked the account.")

Unfortunately, Viapath's Genesis app lacks these basic security features, leaving incarcerated people's accounts vulnerable to PIN cracking.

II. What happened to Santiago's account?

On September 30, 2024, at 6:59pm, another inmate used the Genesis app to crack Santiago's PIN and placed an unauthorized order for \$320 in Tablet Time and \$100 in Phone Debit from Santiago's account. On October 1, 2024, SCDC processed the fraudulent order, removing the \$420 from Santiago's inmate trust account and placing the funds in Santiago's Tablet Time and Phone Debit accounts. (R. p. 2, lines 8-11)

III. SCDC's Step Two Grievance No. KCI-0604-24 is in response to Santiago's Step One Grievance No. KCI-0141-25.

Here, we should clarify a possible point of confusion. SCDC's Step Two Grievance response is marked as "Grievance No. KCI-0604-24" in the upper-right corner, but in the lower part, in the body of the response, SCDC states, "I have reviewed your appeal as stated in Grievance KCI-0141-25. In it you alleged" (R. p. 3, lines 1)2(emphasis added.) SCDC's Step Two Grievance was therefore in response to Santiago's second grievance, No. KCI-0141-25.

IV. SCDC Policy does not accurately describe how the tablets

and Viapath accounts work.

Before we get to the arguments, there is one more topic to address in order to avoid confusion. SCDC Policies regarding how tablets work and how tablet accounts work are inaccurate and should not be relied upon to describe how the tablets and Viapath accounts actually function. For example, SCDC Policy OP-22.53, "Inmate Tablets and Kiosks," Section 6, "Definitions", inaccurately describes Viapath accounts as follows:

GTL Account - A GTL account is an inmate account that allows inmates to pay for phone calls or buy a variety of GTL tablet-related services such as streaming music, movies, and games available at their facilities. Rather than using dollars and cents, GTL accounts use a form of currency called units to enable inmates to pay for these services.

" The above policy is incorrect. There are actually two "GTL accounts" (now called "Viapath accounts"): Tablet Time and Phone Debit. These accounts use dollars and cents as currency, not "units." We mention this to prevent further confusion.

ARGUMENTS

- I. THE ALC ERRED IN DISMISSING SANTIAGO'S APPEAL BECAUSE SANTIAGO'S GRIEVANCE IMPLICATED HIS PROTECTED PROPERTY INTEREST IN HIS INMATE TRUST ACCOUNT.

The ALC, in its Order, stated: "Because the Court concludes that Appellant's claims do not implicate state-created property interests, summary dismissal is appropriate." (R.p. 25, lines 26-27) But the ALC was wrong to dismiss Santiago's appeal because Santiago's grievance implicated a protected property interest in his inmate trust account. See Millholland v. S.C. Dep't of Corr., 436 S.C. 547, 549, 873 S.E.2d 784, 785 (Ct. App. 2022) ("[T]he ALC erred in summarily dismissing Millholland's appeal because his grievance implicated a protected property interest--his inmate trust account.") Millholland is a state-created law.

SCDC's action of removing funds from Santiago's inmate trust account and SCDC's refusal to refund Santiago's money both affected his inmate trust account. Santiago stated in his grievance: "SCDC removed the money from my inmate trust account on Oct. 1, 2024." (R.p.2, lines 10-11) In the same grievance, Santiago requested a refund: "ACTION REQUESTED: Refund the money that was taken from my inmate trust account." (R.p.2, line 27-28)

Santiago's grievance therefore implicated his protected property interest in his inmate trust account.

When Santiago filed his Response in opposition to SCDC's Motion to Dismiss in the ALC, Santiago cited Millholland and stated:

As an incarcerated person, Santiago has a protected property interest in his inmate trust account (also called E.H. Cooper Trust Fund) under the Due Process Clauses of the Fourteenth Amendment to the United

States Constitution and Article 1, Section 3, of the South Carolina Constitution. Henderson v. Harmon, 102 F.4th 242 (4th Cir. 2024); Millholland v. S.C. Dep't of Corr., 436 S.C. 547, 873 S.E.2d 784 (Ct. App. 2022).

[R.p.18, lines 11-18]

Santiago further stated:

SCDC provides inmates with tablet software that contains security flaws that inmates can exploit to crack other inmates' PINs, gain unauthorized access to their accounts, and place unauthorized orders with their money. SCDC then processes the unauthorized orders and refuses to provide refunds or allow inmates to use the grievance system as a post-deprivation remedy. When this happened to Santiago, his due process right -- his protected property interest in his inmate trust account -- was impacted.

[R.p.18, lines 19-24] [R.p.19, lines 1-3]

"[I]nmates have a protected property interest in their inmate accounts." Millholland, 436 S.C. 547, at 550. Because Santiago's grievance implicated that property interest, the ALC erred in dismissing Santiago's appeal. This is an error of law that warrants reversal and remand under S.C. Code § 1-23-610.

II. THE ALC'S DECISION IS CLEARLY ERRONEOUS. IT IS RIDDLED WITH ERRORS, INACCURACIES, AND MISSTATEMENTS OF FACT.

This section of the brief is not a full list of factual errors in the ALC's Order, but is instead a sample of the principal inaccuracies that prejudiced the decision. Santiago submits that the errors described below render the ALC's Order "clearly erroneous" under S.C. Code § 1-23-610(e).

A. The ALC mischaracterized the nature of Santiago's claims and referred to nonexistent "charges."

In their Order, the ALC stated: "Appellant's complaint is that some other inmate ... charged \$420 to his account." (R. p. 23, lines 18-19) That is inaccurate. Another inmate placed a fraudulent order for money to be transferred from Santiago's inmate trust account to Santiago's Viapath Tablet Time and Phone Debit accounts. No money was "charged." The money was moved by SCDC from one account to the others.

B. The ALC Order contains inaccurate and inappropriate references to "stolen funds" and "loss of funds."

In their Order, the ALC referred to Santiago's Tablet Time and Phone Debit funds as "stolen funds." (R. p. 24, line 9) This demonstrates a misunderstanding of Santiago's claims. These funds were not stolen. They were moved to Santiago's other accounts.

In a similar misstatement, the ALC says that "another inmate is responsible for the alleged loss of funds." (R. p. 24, line 22-25) Again, this is wrong. There was not "alleged loss of funds." The funds were not lost. SCDC moved them. SCDC could have put them back.

C. The ALC misstates Santiago's position on the actions that gave rise to his claims.

SCDC's moving of Santiago's money and SCDC's refusal to refund the money were state actions. They were not the actions of a private actor, as stated in the Order. (R.p. 24, line 14) Yet, the ALC stated: "The unauthorized action of an unknown inmate does not support a due process claim against the department." (R.p.24, line 24-25) No, again. Santiago never said that an inmate's action supported his claims. Again, Santiago's claim arose when SCDC moved money out of his account without his knowledge or consent and refused to put it back.

D. The ALC mischaracterizes Santiago's position on the software.

The ALC stated that "Appellant appears to have no property right in the use of a tablet let alone a tablet configured in a specific manner." (R.p. 25, line 11-12) This is technically correct, but it misses the point. Santiago never claimed to have a right to use a tablet. Rather, Santiago insists that "SCDC has a legal obligation to safeguard the money in my inmate trust account. All inmate accounts are vulnerable with the current software." (R.p.2, lines 23-26)

It is irrelevant whether Santiago has a property right to a tablet because another inmate using another tablet cracked Santiago's PIN. It had nothing to do with Santiago's tablet. Further, if SCDC were to refund Santiago's money without fixing the software, then another inmate could just crack Santiago's new PIN and move his money again. Fixing the software is important, even if it isn't related to due process. Again, the problem affects all inmates, not just Santiago.

E. Misunderstandings in the footnotes.

1. The four-digit PIN that Santiago refers to in his Step One Grievance is the last four digits of what SCDC refers to in its policy as a "10-digit PIN."

In their Order, the ALC stated: "In Appellant's October 3, 2024 Step 1 Grievance, he alleges he had a 4-digit PIN. The Department's Inmate Tablets and Kiosks Policy OP-22.53 (July 27, 2021) indicates in Section 2.2 that the PIN consists of 10-digits." (R. p. 23, note 2) Here, the ALC misunderstands the nature of inmate PINs, and the confusion is due to the wording of SCDC's policy. As stated earlier, SCDC Policy does not accurately describe how the tablets work. The 10-digit PIN referred to in the above policy is actually the prisoner's six-digit SCDC inmate ID number plus their four-digit PIN. (Six plus four equals ten.) Santiago actually does have a 4-digit PIN, and that is the number that Viapath's Genesis app allows inmates to crack.

Viapath's so-called services function similarly in other states. See, e.g., United States v. Dubose, 639 F.Supp.3d 503, 509-10 (Eddie DeJesus, an employee of GTL/Viapath, testified that: "To place a call, inmates must: (1) dial a phone number, (2) enter a 6-digit telephone I.D. number ... (4) enter a 4-digit PIN."); State v. George, 2018 WL 6721245, at *8 (Ohio Ct. App. Dec. 20, 2018) ("Inmates are assigned six-digit codes and four-digit pin numbers."); Martinez v. State, 2021 WL 804181 at *5 (Tx. Ct. App., Feb. 10, 2021) (unpublished table decision) ("Each inmate is assigned an individual pin number ... [T]hey are asked to enter that pin number along with a four-digit pin afterwards,").

2. Santiago did not request a release-date refund and cannot receive one because he is serving life without parole.

In another footnote, the ALC stated:

Even if the Court could reach the issue, it lacks merit. In support of his claim, Appellant invokes section 1.7 of Policy OP-22.53. That section states: Upon release, an inmate will turn in their assigned inmate tablet. No refunds will be given for unused entertainment subscriptions, but any funds transferred to the tablet account but not spent on subscriptions will be refunded to the inmate upon release." (emphasis added). Again, Appellant has failed to identify a state statute, regulation, or mandatory Department policy which would entitle him to the transfer he requests prior to being released. The refund function of section 1.7 is only mandatory in the context of an inmate's release.

[R. p. 25, footnote 3]

The ALC confuses the issue once again. Although Santiago quoted part of SCDC Policy OP-22.53, § 1.7, in his Response, he only did so to show that it was possible for SCDC to refund money from unspent funds in inmates' Tablet Time and Phone Debit accounts. Santiago never requested a release-date refund. He does not have a release date. See State v. Santiago, 370 S.C. 153, 158, 634 S.E.2d 23, 26 (Ct. App. 2006) ("The judge sentenced Santiago to life imprisonment without parole.").

There is no rational reason for SCDC to deny Santiago a refund simply because he does not have a release date. Refunds should be available to incarcerated victims of identity fraud regardless of whether they have release dates. This Court should reject the idea that because Santiago does not have a release date, he is ineligible for a refund.

The sheer number of errors in the ALC Opinion renders it "clearly erroneous" for the purposes of S.G. Code § 1-23-610(e).

III. THE ISSUES ARE PRESERVED FOR REVIEW.

In their Order, the ALC stated:

Appellant finally insists that the Department must transfer funds from his tablet and phone accounts back to his E. H. Cooper account. The Court deems this request to be distinct from what Appellant first presented to the Department when initiating the grievance process, i.e., a complaint that an unknown inmate performed fraudulent transfers in his account resulting in the loss of \$420 Appellant's request for

for transfer is a new request for relief which was not presented to the Department below. Consequently, the argument is not preserved for review in this appeal.

[R.p.25, lines 14-21]

As stated earlier, Santiago never complained of a "loss of \$420." When initiating the grievance process, Santiago presented the issue to the Department like this: "On Sep. 30, 2024, a prisoner used this software to crack my PIN, gain access to my account, and make \$420 worth of unauthorized orders in tablet time and phone debit. SCDC removed the money from my inmate trust account on Oct. 1, 2024." (R. p. 2, lines 8-11)

As stated above, the money that SCDC removed from Santiago's inmate trust account on October 1, 2024, went to "tablet time" and "phone debit." These are the names of Viapath tablet accounts. The money was never "lost." It was moved.

In addition, Santiago asked the Department to "[r]efund the money that was taken from my inmate trust account." (R.p.2, lines 27-28) In order for SCDC to refund Santiago's money, SCDC would have to **transfer** it from Santiago's Tablet Time and Phone Debit accounts back to his inmate trust account. Santiago's request for a money transfer was therefore not a new request for relief.

Because Santiago raised the issues stated above to SCDC in his Step One Grievance, they are preserved for review. See Gatewood v. S.C. Dep't of Corr., 416 S.C. 304, 324-25, 785 S.E.2d 600, 611-12 (Ct. App. 2016) (An issue that was raised to an administrative agency is preserved for ~~****~~ appellate review by the ALC.)

CONCLUSION

The ALC erred in dismissing Santiago's appeal because Santiago's grievance implicated a protected property interest in his inmate trust account. Santiago respectfully requests that this Court reverse the decision of the ALC and remand the case for a hearing to determine what process is due. See Millholland, 436 S.C. 547, at 548 ("Once a protected property interest is found, the court must then decide what process is due. This is a question of law."). See also Kiawah Dev. Partners, II v. S.C. Dep't of Health & Env'tl. Control, 411 S.C. 16, 28, 766 S.E.2d 707, 715 (2014) ("[T]he Court may reverse the decision of the ALC where it is in violation of a statutory provision or it is affected by an error of law.")

Respectfully submitted,



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October 07, 2025
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THE STATE OF SOUTH CAROLINA

In the Court of Appeals

APPEAL FROM THE ADMINISTRATIVE LAW COURT

The Honorable Robert L. Reibold, Administrative Law Judge

Case No. 25-ALJ-04-0162-AP

Christopher Santiago, # 304243,

Appellant,

v.

South Carolina Department of Corrections Respondent.

PROOF OF SERVICE

I hereby certify that I, Christopher Santiago, on
October 08, 2025, in Columbia, South Carolina,
served a copy of the foregoing FINAL BRIEF OF

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on all parties to this matter by depositing it in the
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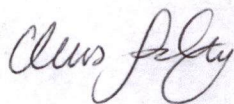
SC Court of Appeals

Re: Record on Appeal and Final Briefs for
Santiago v. SCDC, Appellate Case No. 2025-001744.

Dear Clerk of Court:

Enclosed for filing are my Record on Appeal
and Final Briefs for the above case. I mailed
my Initial Reply Brief earlier this week.

Sincerely,



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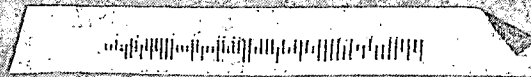
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