

RECEIVED

APR 20 2026

STATE OF SOUTH CAROLINA
ADMINISTRATIVE LAW COURT

SC Court of Appeals

George Adams, #181283,

Docket No. 25-ALJ-15-0026-IJ

Appellant,

v.

ORDER

South Carolina Department of Probation,
Parole and Pardon Services,

Respondent.

This matter is before the South Carolina Administrative Law Court (ALC or Court) pursuant to an appeal filed by George Adams (Appellant), an inmate incarcerated with the South Carolina Department of Corrections. On August 8, 2025, the South Carolina Department of Probation, Parole and Pardon Services (Department) notified Appellant that the Department previously determined by letter dated December 21, 2012, that he was ineligible for parole consideration due to his classification as a subsequent violent offender. On September 15, 2025, Appellant filed the Notice of Appeal challenging this correspondence and requested an evidentiary hearing. This matter was assigned to the undersigned on September 18, 2025.

BACKGROUND

Appellant filed a Notice of Appeal on January 24, 2023, challenging the December 21, 2012 determination that he was ineligible for parole. *See George M. Adams, #181283 v. S.C. Dep't of Prob., Parole and Pardon Serv.*, Docket No. 13-ALJ-15-0005-AP (S.C. Admin. Law Ct. June 18, 2013). The ALC affirmed the Department's determination that Appellant was ineligible for parole, specifically finding that "[b]ecause Appellant was never eligible for parole, PPPS's failure to grant Appellant parole did not constitute a deprivation of Appellant's due process rights." *Id.* Appellant filed another Notice of Appeal on March 18, 2020, in which he appealed the March 6, 2020 correspondence from the Department reiterating the determination that he was ineligible for parole as stated in the December 21, 2012 determination. *See George M. Adams, #181283 v. S.C. S.C. Dep't of Prob., Parole and Pardon Serv.*, Docket No. 20-ALJ-15-0013-AP (S.C. Admin. Law Ct. July 29, 2010). The ALC dismissed this matter on the grounds that, "the Department's March

FILED

11/14/2025

SC Admin. Law Court

6, 2020 correspondence does not constitute a final decision from which Appellant would have the right to appeal to this Court.” *Id.*

On December 21, 2012, Appellant was informed that due to his prior conviction for a violent offense, he was ineligible for parole. On August 1, 2025, Appellant sent a letter to the Department requesting clarification on his sentencing and the applicable law. On August 8, 2025, the Department responded to Appellant stating that during a pre-parole investigation completed in 2012 it was determined that he was ineligible for parole as he is classified as a subsequent violent offender. This letter further stated, “[t]he Agency’s General Counsel has responded to numerous letters concerning your parole eligibility dated, March 6, 2020, September 1, 2020, and August 1, 2023. As previously stated, the Department’s position has not changed.” This appeal followed. On October 6, 2025, the Department filed a Motion to Dismiss (Motion) alleging the matter was untimely and barred by collateral estoppel. Appellant filed his initial brief on October 10, 2025. On October 15, 2025, Appellant requested additional time to file his response to the Motion, which the Court granted. Thereafter, Appellant filed a response to the Motion on November 4, 2025.

DISCUSSION

The Court’s jurisdiction to review this matter is derived from the South Carolina Supreme Court decisions in *Al-Shabazz* and *Furtick*. *Al-Shabazz v. State*, 338 S.C. 354, 527 S.E.2d 742 (2000) (establishing an administrative review process for inmate appeals); *Furtick v. S.C. Dep’t of Prob., Parole & Pardon Servs.*, 352 S.C. 594, 576 S.E.2d 146 (2003) (incorporating final decisions of the Department into that review process). The *Furtick* court further explained that “the permanent denial of parole eligibility implicates a liberty interest sufficient to require at least minimal due process.” 352 S.C. 594, 598, 576 S.E.2d 146, 149 (2003). Importantly, “[a]lthough [section 24-21-620] creates a liberty interest in parole eligibility, it does not create a liberty interest in parole.” *Id.* at 598 n.4, 576 S.E.2d at 149 n.4. “In simple terms, this means that an inmate has a right of review by the [ALC] after a final decision that he is ineligible for parole, but that a parole-eligible inmate does not have the same right of review after a decision denying parole.” *Sullivan v. S.C. Dep’t of Corr.*, 355 S.C. 437, 443 n.4, 586 S.E.2d 124, 127 n.4 (2003).

In this matter, the Court finds that the Department’s August 8, 2025, correspondence does not constitute a final decision from which Appellant would have to right to appeal to this Court.

See Rule 51, SCALCR; see also *Furtick v. S.C. Dep't of Prob., Parole & Pardon Servs.*, 352 S.C. 594, 576 S.E.2d 146 (2003). The Department's correspondence is a response to Appellant's letter reiterating the December 21, 2012 determination that he was ineligible for parole, and stated in several letters since then.¹

ORDER

IT IS THEREFORE ORDERED that the Department's Motion to Dismiss is **GRANTED** and this matter is **DISMISSED WITH PREJUDICE**.

AND IT IS SO ORDERED.

Crystal M. Rookard

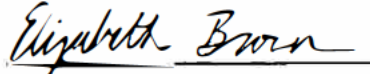
The Honorable Crystal M. Rookard
South Carolina Administrative Law Judge

November 14, 2025
Columbia, South Carolina

¹ The remaining arguments Appellant attempts to make are not preserved for review as Appellant failed to challenge their validity at the agency level. *Brown v. S.C. Dep't of Health & Envtl. Control*, 348 S.C. 507, 560 S.E.2d 410 (2002) (noting that issues not raised to and ruled on by the agency are not preserved for judicial consideration); see also *Gatewood v. S.C. Dept. of Corr.*, 416 S.C. 304, 324–25, 785 S.E.2d 600, 611–12 (Ct. App. 2016) (internal citations omitted) (“[a]n issue that is not raised to an administrative agency is not preserved for appellate review by the ALC”).

CERTIFICATE OF SERVICE

I, Elizabeth Brown, hereby certify that I have this date served this Order upon all parties to this cause by depositing a copy hereof in the United States mail, postage paid, or by electronic mail, to the address provided by the party(ies) and/or their attorney(s).



Elizabeth Brown
Judicial Law Clerk

November 14, 2025
Columbia, South Carolina

RECEIVED
APR 20 2026
SC Court of Appeals