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SC Court of Appeals

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Appeal from Georgetown County

Honorable Benjamin H. Culbertson, Circuit Court Judge

THE STATE,

RESPONDENT,

V.

RYAN O'NEIL WOODRUFF,

APPELLANT

APPELLATE CASE NO. 2025-000101

BRIEF OF APPELLANT

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STATEMENT OF ISSUE ON APPEAL

Did the trial court err by preventing Woodruff from impeaching Alecia Childers with extrinsic evidence of her prior inconsistent statements to Katherine Mitchell and Keristin Brown?

STATEMENT OF THE CASE

A Georgetown County grand jury indicted appellant Ryan O'Neill Woodruff for two counts of murder and on October 21, 2024, appellant was tried before the Honorable Benjamin H. Culbertson and a jury. R. 1. Scott Hixson and Dylan Bagnal represented the State. R. 1. Michael Loignon and Annie Andrews represented appellant. R. 1. The jury convicted appellant. R. 628. Judge Culbertson sentenced appellant to two consecutive terms of life imprisonment. R. 634. On May 29, 2026, this Court denied counsel's petition to be relieved pursuant to Anders v. California, 389 U.S. 738 (1967) and ordered briefing of the issue presented.

STANDARD OF REVIEW

The evidentiary issue in this case is governed by the abuse of discretion standard. State v. Washington, 431 S.C. 394, 405–06, 848 S.E.2d 779, 785 (2020). “An abuse of discretion occurs when the trial court's ruling is based on an error of law.” Id. (internal quotations and citations omitted).

ARGUMENT

The trial court erred by preventing Woodruff from impeaching Alecia Childers with extrinsic evidence of her prior inconsistent statements to Katherine Mitchell and Keristin Brown.

The State's case in this double murder largely rested on the testimony of appellant's onetime girlfriend, Alecia Childers. Childers was charged with the murders and made a deal with the State to testify against appellant in exchange for the reduction of her charges to accessory after the fact. R. 235. Had the trial court not improperly disallowed impeachment of Childers under Rule 613, SCRE, because of its misapplication of the hearsay rules, the result of this trial would have been different.

On May 22, 2021, Ashley Miller was approached by Trevon Johnson to come with him to her neighbors' house. R. 129-30. Miller's neighbors were Roger Woodruff and Deborah Goins. Johnson told Miller that he could see Roger through the window and he was not responding. R. 130. Miller went with Johnson on the back porch and the door was unlocked, so they went inside. R. 131. Miller noticed a bad smell. R. 132. She saw Roger sitting in a recliner with a blanket over him and blood spattered on the wall. R. 132. Miller knew Roger was dead and called 911. R.132-33. Johnson did not want Miller to call the police. R. 136. When Miller was interviewed at the scene by police, she told them Johnson was acting suspicious, was a thief, and that she did not trust him. R. 136.

The first officer on the scene said Johnson was acting "kind of sketchy." R. 122. When the officer cleared the house, he found Roger dead from blunt force trauma to the head. R. 112. The officer also found Deborah in a wheelchair in another room also dead from blunt force trauma to the head. R. 112.

Johnson testified that he thought of Roger as his “uncle.” R. 141. In between the time the bodies were found and the time of trial, Johnson went to drug rehab twice. R. 138-39. He was addicted to Roxicodone. R. 155. He also used fentanyl, cocaine, and heroin. R. 155. He admitted he was “strung out” when the bodies were found. R. 155. The lead investigator learned that Deborah was known to have Roxicodone. R. 382. The toxicology report on Deborah found meth and opioids in her system. R. 334. Johnson denied he was at the house to get pills from Deborah. R. 157.

When Johnson gave his statement to the police, he omitted that he had been at Roger and Deborah’s house in the days prior to their bodies’ discovery. R. 158-59. Two days before the bodies were found, Johnson claimed to have visited Roger and Deborah and noticed pizza on the stove. R. 150-51. When he asked if he could have some, Deborah told him no because the pizza belonged to appellant and Childers. R. 150-51. Johnson claimed to have seen Childers enter the house with groceries. R. 151. He did not see appellant. R. 160.

The next day, Johnson let himself into the house. R. 148. He saw Roger in his chair and thought he was sleeping. R. 148. Johnson had no phone, so he used Deborah’s phone to call his boss to come pick him up for work. R. 148. Cell phone records obtained by police showed calls from Deborah’s phone at 10:30 AM to Johnson’s employer. R. 428-29.

Childers testified that she and appellant were using a lot of drugs during this period, including meth. R. 166. They were having a hard time finding a place to stay and appellant’s uncle arranged for them to stay with Roger and Deborah. R. 166-68. She claimed appellant had gone a week without sleeping and had gotten paranoid. R. 183. Contradicting Johnson, she said she heard another man in the house, but claimed she never saw Johnson. R. 184.

Childers had a bad toothache and went to sleep with appellant. R. 184-85. The next morning, appellant's uncle picked them up to go to work. R. 186. She claimed appellant was rushing her, but insisted she be quiet so not to wake up Roger. R. 187-88. She saw Roger's feet in his recliner. R. 187-88. She did not see any injuries. R. 188. She heard Deborah snoring in her room. R. 188.

After an hour working with appellant's uncle, Childers' tooth hurt too badly to continue, so they went back to Roger and Deborah's house. R. 190-91. She immediately knew something was wrong when they entered the house because "the aura was off." R. 192. She then noticed that Roger had blood on him and told appellant they needed to call for help. R. 192. Appellant handed her his cell phone and supposedly told her if she sent him to jail, he would kill her and kill her kids. R. 194-95. She said appellant then began cleaning the house to remove evidence. R. 195-97. Childers said she only got a brief look at Deborah hunched over in her wheelchair before appellant pulled the door shut. R. 197. Appellant pulled a crowbar from behind a mirror and handed it to her. R. 198-99. This conveniently explained why Childers' DNA was found on the crowbar by the police. R. 400-01.

Childers and Appellant took some items with them and left the house. R. 199. They dumped the items in the woods and then went to appellant's grandparents' house. R. 202-03. They spent the night there, much to the displeasure of the grandparents. R. 208-09. The couple then went to appellant's father's house. R. 210-11. Childers said she was talking with appellant's mother when she claimed appellant hit her in the head with a trailer hitch connected to a piece of rope. R. 212-13. Childers was seriously injured and was ultimately airlifted to Myrtle Beach for treatment. R. 212-15.

After Childers began to recover, she told the police numerous lies. She pretended not to know that Deborah and Roger were dead. R. 238. She lied about drugs being used. R. 241. She lied and said she did not know what Roxicodone was, but then admitted that she was addicted to them. R. 242-43. She claimed that she lied to the police because she was scared of appellant, even though appellant had been arrested. R. 247. However, Childers continued to vacation with appellant's family before she was ultimately arrested for the murders. R. 251-52.

Defense counsel confronted Childers with her admission to her cellmate, Katherine Mitchell. R. 255-56. He asked Childers if she told Mitchell that she killed Deborah and Roger and she denied it and replied, "I never told her anything." R. 255-56. Defense counsel asked if she told Mitchell "it was a shame that Ryan was taking the fall" and she denied making that statement. R. 255-56. He asked her, "Because you were the one that killed Debbie and Roger," and Childers responded, "No, sir, I did not." R. 256.

The State then objected during defense counsel's next question, stating, "Your Honor, I'm gonna have to object to that. She's denied making a statement and he's introducing the statement that she's denied making." R. 256. The judge said, "You can produce the statement to impeach her testimony, but you need to have the statement." R. 256. Defense counsel then asked Childers if she remembered having any conversation with Mitchell about this incident and Childers replied that Mitchell had been through her legal paperwork." R. 256.

Defense counsel also confronted Childers with statements she made to another cellmate, Keristin Brown. R. 256-57. He asked Childers if Brown also went through her legal papers. R. 256. Childers replied, "Uh-uh." R. 256. Childers denied telling Brown she committed the murders and that she woke up with her hands on the murder weapon. R. 257.

Appellant called Mitchell in his case and advised the court it needed to take up a matter of law. R. 546. Judge Culbertson excused the jury and the solicitor argued that Mitchell should not be allowed to testify about the admissions made to her by Childers. R. 546-553. The solicitor argued Mitchell had a motive to lie because she thought Childers was responsible for the drug overdose in jail of one of Mitchell's friends. R. 546-553. The solicitor argued that the proper foundation for admission of a prior inconsistent statement had not been laid. R. 546-553. Defense counsel argued that Childers was a party-opponent and he should be allowed to testify about Childers' confession. R. 546-553.

Judge Culbertson replied that Childers was not a party-opponent and that what defense counsel wanted to do was improper pitting and hearsay. R. 546-553. Defense counsel argued he confronted Childers with the statements she made to Mitchell. R. 546-553. Judge Culbertson ruled it was inadmissible hearsay. R. 546-553. After a brief recess, defense counsel argued that preventing Mitchell's testimony was a due process violation. R. 546-553. The State responded that Mitchell's testimony would be unreliable and continued to argue that no proper foundation had been laid. R. 546-553. Judge Culbertson maintained his ruling that the impeachment evidence was "clearly within the hearsay prohibition" and refused to allow the questioning. R. 546-553. When defense counsel called Brown, the judge said the same ruling applied to Brown's testimony impeaching Childers. R. 559.

The trial court erred because the impeachment testimony was proper under Rule 613. Rule 613, SCRE. Rule 613(b), SCRE, states:

(b) Extrinsic Evidence of Prior Inconsistent Statement of Witness. Extrinsic evidence of a prior inconsistent statement by a witness is not admissible unless the witness is advised of the substance of the statement, the time and place it was allegedly made, and the person to whom it was made, and is given the opportunity to explain or deny the statement. If a witness does not admit that he

has made the prior inconsistent statement, extrinsic evidence of such statement is admissible.

Rule 613(b), SCRE. Childers was advised of the substance of the statements and the persons to whom the statements were made. She was advised of the time and place of the statements—when she was locked up with both women. Childers emphatically denied making the statements and explained that the women went through the discovery materials in her cell. Childers' denials were unequivocal. See State v. Carmack, 388 S.C. 190, 201-02, 694 S.E.2d 224, 229-30 (Ct. App. 2010) (“When the issue is whether the witness admitted making the prior inconsistent statement, the admission must be unequivocal.”). The extrinsic evidence of the statements through Mitchell and Brown were admissible.

In State v. Fossick, 333 S.C. 66, 508 S.E.2d 32 (1998), a witness claimed he left the scene before the defendant supposedly committed the murder. Defense counsel asked the witness if he ever told his girlfriend, “I killed that bitch. I’ll kill you, too.” The witness denied making the statement. Id. at 68-69, 508 S.E.2d at 33. The State opposed admission of the testimony of another witness who heard the statement and the trial judge excluded it. Id. The Fossick Court held the trial judge erred and the extrinsic evidence was admissible under Rule 613. Id. Appellant’s case is analytically identical to Fossick.

Rule 613 “does not require extrinsic evidence of the prior statement be admitted immediately. It merely authorizes the use of extrinsic evidence to prove the inconsistency. Because the impeaching evidence is “extrinsic,” the avenue of its admissibility may not always run through the witness to be impeached by it, for that witness may not be competent to authenticate the extrinsic evidence.” State v. Barnes, 421 S.C. 47, 58, 804 S.E.2d 301, 307 (Ct. App. 2017). In Barnes, the State wanted to impeach the defendant’s mother with a prior inconsistent statement. The defendant’s mother “flatly denied she had stated Barnes was the one

in the surveillance video wearing the grey sweatshirt” during a recorded phone conversation with McCoy, a policeman. Barnes at 57, 804 S.E.2d at 306-07. The State called McCoy and played his recorded interview with Barnes’ mother in which she identified Barnes wearing a grey sweatshirt. Id. Under the trial judge’s flawed reasoning in appellant’s case, McCoy’s testimony in Barnes would be hearsay and inadmissible. See also State v. Bixby, 388 S.C. 528, 550-51, 698 S.E.2d 572, 584 (2010) (holding extrinsic evidence properly admitted under Rule 613(b) through police officer when witness denied knowing who the officer was).

The trial court mistakenly found to be hearsay Mitchell and Brown’s testimony that is specifically allowed under Rule 613. The State’s argument about reliability only went to the weight of the evidence, not its admissibility. The jury was entitled to hear about Childers’ confessions to her cellmates and weigh the credibility of Mitchell and Brown. Childers was an admitted liar and drug addict and had a motive to kill Deborah for her pills. This Court should reverse and remand for a new trial.

CONCLUSION

For the foregoing reasons, this Court should reverse appellant's convictions and remand for a new trial.

A handwritten signature in blue ink, appearing to read 'DAVID ALEXANDER', is written over a horizontal line.

David Alexander
Deputy Chief Attorney for Capital Appeals

ATTORNEY FOR APPELLANT

This 29th day of June, 2026.