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SC Court of Appeals

STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM THE ADMINISTRATIVE LAW COURT
The Honorable S. Phillip Lenski, Administrative Law Judge

Case No. 25-ALJ-15-0034-AP
Appellate Case No. 2026-001402

STEPHEN BECKHAM, #236548, APPELLANT,

v.

SOUTH CAROLINA DEPARTMENT OF PROBATION, PAROLE AND
PARDON SERVICES RESPONDENT.

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**STATE OF SOUTH CAROLINA
ADMINISTRATIVE LAW COURT**

Stephen Beckham, #236548,

Appellant,

v.

South Carolina Department of Probation,
Parole and Pardon Services,

Respondent.

Docket No. 25-ALJ-15-0034-AP

FINAL ORDER

This matter is before the South Carolina Administrative Law Court (ALC or Court) pursuant to Notice of Appeal filed on December 20, 2025, by Stephen Beckham (Appellant), an inmate in the custody of the South Carolina Department of Corrections (SCDC). On November 19, 2025, the South Carolina Department of Probation, Parole and Pardon Services (Department or Respondent) notified the Appellant of the South Carolina Parole Board's (Parole Board) unanimous decision to deny the Appellant parole.

On December 30, 2025, the Department notified the Appellant that a careful review of the entire record before the Parole Board revealed nothing to indicate the Parole Board may have relied upon materially erroneous or incomplete information of a substantial nature. Therefore, the Appellant's request for reconsideration by the Parole Board was denied. The Appellant appeals the Parole Board's denial of parole because his minimal due process rights were violated under *Compton v. S.C. Dep't of Prob., Parole & Pardon Servs.*, 385 S.C. 476, 685 S.E.2d 175 (2009) and because his parole file contained inaccurate and misleading information on several material points. After careful consideration of the parties' brief and the applicable statutes, the Department's decision is affirmed.

BACKGROUND

On June 12, 1994, a Newberry County Sheriff's deputy responded to a fatal single-vehicle wreck in Little Mountain. The deputy noticed that the victim's injuries were not consistent with the traffic accident and began investigating. After a one (1) year investigation, authorities arrested Richard George Anderson. Mr. Anderson cooperated and informed the investigators that he had

been hired by the victim's estranged husband, the Appellant, to assist with the murder. Mr. Anderson told investigators that the Appellant had brought his badly beaten wife to an arranged location where they killed her and staged the accident to cover up the murder. Based on Mr. Anderson's confession, the Appellant was arrested.

October 4, 1996, the Appellant was convicted of murder, kidnapping, and conspiracy and was sentenced to life in prison. Due to aggravated factors, the Appellant would not be parole eligible for thirty (30) years. On November 19, 2025, the Appellant had his first appearance before the Parole Board. The Parole Board unanimously denied the Appellant parole due to the nature and seriousness of the current offense and indication of violence in this or previous offense.

STANDARD OF REVIEW

The court's jurisdiction to review this matter is derived from the South Carolina Supreme Court decisions in *Al-Shabazz* and *Furtick*. See *Al-Shabazz v. State*, 338 S.C. 354, 527 S.E.2d 742 (2000) (establishing an administrative review process for inmate appeals); see also *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). As explained by the *Al-Shabazz* Court, "procedural due process is guaranteed when an inmate is deprived of an interest encompassed by the Fourteenth Amendment's protection of liberty and property." *Wicker v. S.C. Dep't of Corrs.*, 360 S.C. 421, 424, 602 S.E.2d 56, 58 (2004) (citation omitted).

Since parole is a privilege, not a right, the routine denial of parole does not constitute such a liberty interest. See *Cooper v. S.C. Dep't of Prob., Parole & Pardon Servs.*, 377 S.C. 489, 495-96, 661 S.E.2d 106, 109-10 (2008) (citation omitted). If, however, the Board "deviates from or renders its decision without consideration of the appropriate [statutory] criteria, . . . it essentially abrogates an inmate's right to parole eligibility and, thus, infringes on a state-created liberty interest." *Id.* at 499, 661 S.E.2d at 111. Thus, this court may review decisions from the Department for violations of statutory procedure or procedural due process only but may not review the Board's substantive decision to deny an appellant parole.

In reviewing such matters, the court sits in its appellate capacity. See *id.* at 497, 661 S.E.2d at 110 (citation omitted); *Al-Shabazz*, 338 S.C. at 377, 527 S.E.2d at 754 (citation omitted). Under the Administrative Procedures Act, the court's review in appellate matters is confined to the record. S.C. Code Ann. § 1-23-380(4). The court may modify or reverse the decision of the agency when substantial rights of the appellant have been prejudiced. S.C. Code Ann. § 1-23-

380(5). Substantial rights of the appellant are prejudiced when the agency's findings, inferences, conclusions, or decisions are: (a) in violation of constitutional or statutory provisions; (b) in excess of the statutory authority of the agency; (c) made upon unlawful procedure; (d) affected by other error of law; (e) clearly erroneous in view of the reliable, probative, and substantial evidence on the whole record; or (f) arbitrary or capricious or characterized by abuse of discretion or clearly unwarranted exercise of discretion. *Id.*

DISCUSSION

The Appellant argues that the Department violated his due process rights by providing the Parole Board with an unreliable and materially incomplete parole file and excluding known victims from the Parole Board's normal investigative process. Specifically, the Appellant asserts that on the day of his parole hearing, he reviewed his parole file and identified several material inaccuracies, including the misidentification of the sentencing judge, an unsubstantiated reference to an alleged confession, and an unverified third-party allegation indicating that the Appellant participated in a plot to escape from prison. Although, the Appellant marked the inaccuracies, requested correction and attempted to clarify the errors during the hearing, the Parole Board voted unanimously to deny him parole. Further, the Appellant's parole file was materially incomplete with respect to victim input and this selective development of his parole file is prejudicial. Specifically, the Appellant contends that two (2) of his children were not afforded the opportunity to provide a confidential written victim statement for the Appellant's parole file.

The Department asserts that pursuant to *Cooper*, if the notice of rejection clearly states that the Parole Board carefully considered the factors published in Department Form 1212, the factors outlined in S.C. Code Ann § 24-24-640 and 24-21-10(F)(1), and consideration of the actuarial needs assessment, then the decision will constitute a routine denial of parole and summary dismissal is appropriate. Furthermore, the Department argues that the Appellant was given the opportunity to review his parole file and inform the Parole Board of inaccuracies in his parole file, thus satisfying the requirements of *Kelsey v. S.C. Dept. of Probation, Parole and Pardon Services*, 441 S.C. 373, 893 S.E.2d 588 (Ct. App. 2023) (cert. denied March 5, 2024).

As stated *supra*, parole is not a right, but a privilege. *State v. Dingle*, 376 S.C. 643, 649, 659 S.E.2d 101, 104 (2008) (citing *Sullivan v. S.C. Dep't of Corrs.*, 355 S.C. 437, 443, 586 S.E.2d 124, 127 n.4 (2003)). The discretion to grant parole lies solely with the Parole Board. *Id.* at 649, 659 S.E.2d at 104-05 (citing *State v. McKay*, 300 S.C. 113, 115, 386 S.E.2d 623, 623-24 (1989)).

If, in denying parole, the Parole Board follows proper procedure, then its decision will constitute a routine denial of parole and summary dismissal of the case would be appropriate. *See Cooper*, 377 S.C. at 500, 661 S.E.2d at 112; *see also Compton v. S.C. Dep't of Prob., Parole & Pardon Servs.*, 385 S.C. 476, 479, 685 S.E.2d 175, 177 (2009).

The proper procedure for the Parole Board to follow includes considering the factors outlined in Section 24-21-640 of the South Carolina Code, as well as those listed in the Department's parole form. *Cooper*, 377 S.C. at 500, 661 S.E.2d at 112; *Compton*, 385 S.C. at 479, 685 S.E.2d at 177; *see also* S.C. Code Ann. § 24-21-640 (Supp. 2019) (setting forth the statutory factors warranting parole). Additionally, the Parole Board must utilize an actuarial risk and needs assessment factors, in making its parole determinations. *See* S.C. Code Ann. § 24-21-10(F)(1) (Supp. 2019). If the Parole Board fails to follow proper procedure, giving due consideration to the specified factors, an appellant is denied his liberty interest in parole eligibility. *Cooper*, 377 S.C. at 499, 661 S.E.2d at 111. If, however, the Parole Board adheres to procedure and considers all the requisite factors, the appellant's liberty interest is protected, and the Parole Board has the discretion to deny parole based on any of the factors found in Section 24-21-640 or its own criteria. *See id.* at 499, 661 S.E.2d at 111-12.

Here, the Parole Board's order plainly reflects that it considered all the appropriate factors – including those set forth in Section 24-21-640, the Department's own criteria for parole consideration, and an actuarial risk and needs assessment pursuant to Section 24-21-10(F)(1) – before making its decision to deny the Appellant parole. Thus, as a routine denial of parole, the court's ability to further review this matter is limited:

[T]he Parole Board may avoid [reversal of its parole determinations] if it clearly states in its order denying parole that it considered the factors outlined in section 24-21-640 and the fifteen factors published in its parole form. If the Board complies with this procedure, the decision will constitute a routine denial of parole and the ALC would have limited authority to review the decision to determine whether the Board followed proper procedure. Under that scenario, the ALC can summarily dismiss the inmate's appeal.

Cooper, 377 S.C. at 500, 661 S.E.2d at 112; *see Compton*, 385 S.C. at 479, 685 S.E.2d at 177. Consequently, because the record reflects that the Parole Board routinely denied the Appellant parole after complying with the necessary procedure, the court may not interfere with the Department's determination. Therefore, based on the foregoing,

IT IS HEREBY ORDERED that the Department's decision is **AFFIRMED**.
AND IT IS SO ORDERED.



S. Phillip Lenski
Administrative Law Judge

May 22, 2026
Columbia, South Carolina

CERTIFICATE OF SERVICE

This is to certify that on this date the undersigned has served this notice/order in the above entitled-action upon all parties to this case 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).



Name

22 May 2026

Date

**STATE OF SOUTH CAROLINA
ADMINISTRATIVE LAW COURT**

Stephen Beckham, #00236548,

Appellant,

v.

South Carolina Department of Probation,
Parole and Pardon Services,

Respondent.

Docket No. ____ -ALJ-15- ____ -AP

NOTICE OF APPEAL

Notice is hereby given that Stephen Beckham, #00236548 appeals the final decision of the South Carolina Department of Probation, Parole and Pardon Services dated and received on November 19, 2025, a copy of which is attached. In accordance with Rule 59(B) of the Rules of Procedure for the South Carolina Administrative Law Court (SCALC Rules) please provide a brief factual basis for each expressly and specifically asserted constitutional violation:

Mr. Beckham's minimal due process rights were violated under Compton v. S.C. Dep't of Prob., Parole & Pardon Servs., 385 S.C. 476, 685 S.E.2d 175 (2009) and the Parole Board's decision to deny parole is not supported by reliable, probative, and substantial evidence as required by S.C. Code Ann. § 1-23-380. The parole file for Mr. Beckham's November 19, 2025 hearing contained inaccurate and misleading information on several material points: the parole file erroneously states that Mr. Beckham admitted his guilt, the sentencing judge is misidentified as "Sidney Floyd, deceased" rather than The Hon. Henry Floyd, and law enforcement opposition indicates Mr. Beckham was "involved in an escape plot," a charge that was dismissed and expunged from his record greater than 3 years ago pursuant to S.C. Code Ann. § 17-1-40. Further, three (3) victim witnesses, the children of the victim, were never given the opportunity to provide written victim impact statements for the file, pursuant to the S.C. Constitution and the Parole Board Manual.

Stephen Beckham, #00236546

Appellant's Name

Time Served, P.O. Box 615

Mailing Address

Tailors, SC 29687

City, State, Zip Code

Signed

Dated

CERTIFICATE OF SERVICE

I hereby certify that I, Megan Powell (your name), on the 19 day of December, 2025, in Greenville (city), South Carolina, served a copy of the foregoing Notice of Appeal on all parties to this matter by depositing the same in the United States Mail, postage paid, and addressed as follows:

Name of person/Agency served: Division of Legal Services, S.C. Dept of Probation, Parole & Pardon Services

Address: 293 Greystone Blvd., P.O. Box 207

City, State, Zip Code: Columbia, SC 29202

Megan Powell

Print your name

(See reverse side for instructions)

Sign your name

BRIEF OF APPELLANT

STATE OF SOUTH CAROLINA
In the Administrative Law Court
Docket No. 25-ALJ-15-0034

APPEAL OF FINAL DECISION
Department of Probation, Parole and Pardon Services

STEPHEN BECKHAM, #236548,..... APPELLANT,

v.

S.C. DEPARTMENT OF PROBATION, PAROLE AND
PARDON SERVICES RESPONDENT.

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STATEMENT OF ISSUES ON APPEAL

1. Did the South Carolina Department of Probation, Parole and Pardon Services (“SCDPPPS” or “the Agency”) violate Mr. Beckham’s due process rights by providing the Parole Board with an unreliable and materially incomplete parole file, particularly where known victims were excluded from the Agency’s normal investigative process?
2. Did SCDPPPS violate Mr. Beckham’s due process rights by maintaining procedures that prevented him from meaningfully reviewing and rebutting false or misleading information in the parole file prior to the parole hearing?

STATEMENT OF THE CASE

This is an appeal of a final decision by SCDPPPS denying Mr. Stephen Beckham (“Appellant”) parole following a November 19, 2025 parole hearing before the Parole Board, based on a record prepared and presented by SCDPPPS. Appellant is presently serving a life sentence in the South Carolina Department of Corrections for the death of his wife (“the victim”). Following a high-profile, televised death-penalty trial in 1996, Appellant was convicted of murder, kidnapping, and conspiracy to commit murder. Appellant and the victim shared three children: Shannon, Andrew, and Samuel, all of whom are now adults and, under the South Carolina Constitution, are legally recognized victims of the crime for which their father is incarcerated.¹

The Agency’s parole investigation and preparation began on or around February 22, 2024, when Appellant met with a parole examiner to review the Criteria for Parole Consideration. **R. at 2.** On November 19, 2025, Appellant made his first appearance before the Parole Board. On the day of the hearing, Appellant and his attorney reviewed the parole file and identified several material inaccuracies, including misidentification of the sentencing judge, an unsubstantiated reference to an alleged confession, and an unverified third-party allegation indicating Appellant participated in a plot to escape from prison—an allegation that could have been affirmatively refuted with readily available documentation had Appellant been provided a meaningful opportunity to review the file in advance of the hearing.

Appellant and his attorney marked the inaccuracies, requested correction, and attempted to address and clarify those errors during the hearing. The Board voted unanimously to deny

¹ The Victims’ Bill of Rights in the South Carolina Constitution defines a Victim as “a person who suffers direct or threatened physical, psychological, or financial harm as the result of the commission or attempted commission of a crime against him. The term ‘victim’ also includes the person’s spouse, parent, child, or lawful representative of a crime victim who is deceased, who is a minor or who is incompetent or who was a homicide victim or who is physically or psychologically incapacitated.” S.C. Const. art. I, § 24(C)(2).

Appellant parole and issued a Notice of Rejection (“the Notice” or “Notice”) the same day. **R. at 2.** In the Notice, the Board stated that Appellant’s parole “must be denied,” after careful consideration of: (1) the characteristics of [Appellant’s] current offense(s), prior offense(s), prior supervision history, prison disciplinary record, and/or prior criminal record, as described in the findings of fact below; (2) the factors published in Department Form 1212 (Criteria for Parole Consideration); (3) the factors outlined in Section 24-21-640 of the South Carolina Code of Laws, and (4) actuarial risk and needs assessment factors pursuant to Section 24-21-10(F)(1) of the South Carolina Code of Laws. **R. at 2.** To support this determination, the Board articulated two Findings of Fact: (01) Nature And Seriousness Of Current Offense, and (02) Indication Of Violence In This Or Previous Offense. **R. at 2.**

Shortly after the parole hearing, two of Appellant’s children, Shannon and Samuel, contacted Appellant’s attorney. They explained a victim’s advocate had never reached out to them from the Agency, therefore, they did not have an opportunity to provide a confidential written victim statement for the parole file, despite the fact that they are immediate relatives of the victim of the crime. **R. at 10.** In fact, the Agency only contacted one of the victim’s children during the investigation process, and that was Shannon, in her capacity as Appellant’s next of kin. **R. at 10.** In their capacity as victim witnesses, the children only received the standard Notice of Parole Hearing on or around October 14, 2025. **R. at 18.**

In the absence of investigative-stage outreach, certain victims were instead left to express their views, if at all, during the parole hearing itself. That setting proved to be a limited and inadequate substitute for confidential written input. At least one victim was unable to deliver a statement due to the emotional weight of the proceeding, while another expressed her position in the presence of close family members who opposed her views. A third victim, though supportive of Appellant’s release, did not participate at all due to the lasting trauma of the underlying offense. Meanwhile, the parole file included a third-party statement from law enforcement purporting to reflect the position of the victim’s family, despite the Agency’s failure to contact the victim’s children to solicit or confirm their views.

Based on the factual inaccuracies and the incompleteness of the parole file, Appellant’s attorney submitted a Request for Reconsideration to the Agency on December 3, 2025. **R. at 3.** On December 19, 2025, a Notice of Appeal was filed with this Court and served upon the Agency. On December 30, 2025, the Agency denied Appellant’s request for reconsideration, basing its decision

on the proposition that “the entire record before the Board reveals nothing to indicate the Board may have relied upon materially erroneous or incomplete information of a substantial nature.” **R. at 20.**

STANDARD OF REVIEW

The Administrative Law Court (“ALC”) sits in its appellate capacity when reviewing a final decision of SCDPPPS. *Cooper v. S.C. Dep’t of Prob., Parole & Pardon Servs.*, 377 S.C. 489, 497, 661 S.E.2d 106, 110 (2008). The ALC has subject matter jurisdiction to review final agency decisions, including parole denials that implicate due process concerns. *Al-Shabazz v. State*, 338 S.C. 354, 369, 527 S.E.2d 742, 750 (2000). The scope of the ALC’s review is governed by the South Carolina Administrative Procedures Act (“APA”). Under the APA, the ALC may reverse, modify, or remand a decision if the appellant’s substantial rights have been prejudiced because the agency decision is:

- (a) in violation of constitutional or statutory provisions;
- (b) in excess of the statutory authority of the agency;
- (c) made upon unlawful procedure;
- (d) affected by other error of law;
- (e) clearly erroneous in view of the reliable, probative and substantial evidence on the whole record; or
- (f) arbitrary or capricious or characterized by abuse of discretion or clearly unwarranted exercise of discretion.

S.C. Code Ann. § 1-23-380(5) (2025).

Although parole decisions are generally discretionary, an inmate has a state-created liberty interest in receiving a statutorily compliant parole review. *Barton v. S.C. Dep’t of Prob., Parole & Pardon Servs.*, 404 S.C. 395, 413, 745 S.E.2d 110, 120 (2013). That interest is infringed where the Parole Board deviates from or renders its decision without consideration of the required criteria. *Cooper*, 377 S.C. at 499, 661 S.E.2d at 112. Accordingly, a parole denial that is based on unlawful procedure or arbitrary decision-making is subject to reversal under the APA.

ARGUMENT

- I. SCDPPPS created an unreliable and materially incomplete parole file, depriving the Board of the ability to consider the required criteria.**

While parole decisions are soundly within the discretion of the Parole Board, that discretion is not unbounded. The South Carolina Supreme Court has made clear that the Board must render its decision only after consideration of the appropriate criteria. *Cooper*, 377 S.C. at 499, 661 S.E.2d at 112. This appeal does not challenge the Board’s weighing of evidence, but rather the Agency’s failure to develop and present the information necessary for the Board to exercise that discretion in the first place.

The criteria the Board must consider are established by both statute and agency policy. *See* S.C. Code Ann. § 24-21-640; **R. at 2**. The primary evidentiary record upon which the Board makes its decision is the parole file, which is investigated and compiled by the Agency. Under the South Carolina Administrative Procedures Act, an agency decision must be supported by “reliable, probative, and substantial evidence on the whole record.” S.C. Code Ann. § 1-23-380(5)(e). South Carolina courts have held that this standard requires more than one-sided or incomplete evidence. *See Lark v. Bi-Lo, Inc.*, 276 S.C. 130, 135, 276 S.E.2d 304, 306 (1981).

The statutory and regulatory framework governing parole decisions presumes the existence of a complete and reliable parole file. However, where the Agency fails to collect, verify, or accurately present the Board with a parole file that provides them with “reliable, probative, and substantial evidence on the whole record,” the Board does not have an evidentiary record sufficient to meaningfully consider that required parole criteria. As such, parole decisions rendered after consideration of incomplete, inaccurate, or misleading parole files are necessarily arbitrary and are subject to review, reversal, or modification. *See* S.C. Code Ann. § 1-23-380; *Porter v. S.C. Pub. Serv. Comm’n*, 333 S.C. 12, 507 S.E.2d 328 (1998) (holding that an agency decision is arbitrary where it lacks a rational basis or reflects a failure to apply consistent standards); *cf. Blackwell v. S.C. Dep’t of Prob., Parole & Pardon Servs.*, Op. No. 2024-UP-211 (S.C. Ct. App. filed June 12, 2024) (finding no prejudicial due process violation resulted from inaccurate parole file information *because* the Board had access to, and an opportunity to reconsider its decision after reviewing, corrective evidence).

In Appellant’s case the Agency presented the Board with a parole file that was unreliable and materially incomplete, particularly with respect to victim input. This selective development is prejudicial because victim impact and testimony are widely understood to be significant factors in parole decision-making, and a record that amplifies opposition while excluding known support presents a fundamentally skewed foundation for the Board’s decision.

a. SCDPPPS arbitrarily solicited and included in the parole file victim opposition from some victims while excluding other legally recognized victims.

The South Carolina Constitution guarantees crime victims the right to be informed of and to participate in proceedings affecting an offender's potential release. S.C. Const. art. I, § 24. These constitutional protections are implemented, in part, through clear statutory notice requirements. *See* S.C. Code Ann. § 24-21-221 (requiring the Agency "give a thirty-day written notice of any board hearing during which the board will consider parole for a prisoner" to the immediate family members of any deceased victim of the crime); S.C. Code Ann. § 16-3-1560(A) (requiring "reasonable" notice to victims of "post-conviction proceedings affecting the probation, parole, or release of the offender[.]"). In addition to these notice requirements, which allow the victims to be present and provide publicly available testimony during the hearing, the Agency compiles written victim input during the investigative phase for inclusion in the parole file, effectively creating a bifurcated model of victim participation. This written input is materially distinct from testimony presented at the hearing because the Agency treats such submissions as confidential and primarily for the Board's review, and parole-eligible inmates are not meaningfully positioned to review or rebut those statements. *See Kelsey v. S.C. Dep't of Prob., Parole & Pardon Servs.*, 441 S.C. 373, 893 S.E.2d 588 (Ct. App. 2023).

Here, the Agency complied with the statutory notice requirement of providing the victims with written notice of the hearing and their ability to attend. **R. at 18.** However, the Agency's methods for developing victim-related evidence within the second, investigative component were neither transparent nor consistently applied. The parole file reflects that the Agency obtained and included some written victim impact statements. The Agency did not, however, identify and contact the three individuals most directly affected by the offense, the children of the deceased victim, each of whom is a legally recognized victim under South Carolina law, and each of whom *did* receive the thirty-day hearing notice. These individuals were known, identifiable, and entitled to participate in the process, yet were not afforded the opportunity other victims had to submit confidential written input during the investigative phase. At the same time, the Agency accepted a third-party opposition statement from law enforcement, purportedly on behalf of the victim's family, without contacting the victim's children to verify whether that statement reflected their views or to provide them with an opportunity to offer their own input. In doing so, the Agency

permitted this unverified third-party opposition to stand in place of the victims' actual perspectives and presented these statements to the Board for advance consideration.

Although this failure most directly implicates the constitutional rights of the victims themselves, its relevance to this appeal lies in its effect on the integrity of the parole record. Selectively developing a parole file that includes the views of some victims while excluding others, particularly those who support release, creates a skewed portrayal of victim sentiment and introduces imbalance into a critical factor in parole decision-making. Such selective development of the parole file, where some victims are identified, contacted, and included in the investigative record while others are only contacted with the hearing notice, lacks any discernible standard and constitutes arbitrary agency action. *See Porter*, 333 S.C. at 20, 507 S.E.2d at 332.

b. Additional investigative failures further deprived the Board of information necessary to evaluate required criteria.

The inadequacy of the parole file extends beyond the Agency's failure to include consistent and complete victim input. The file also contained material inaccuracies and omissions that directly relate to enumerated parole criteria.

First, the file incorrectly identified the sentencing judge as another judge who is now-deceased, when in fact the presiding judge is alive and currently serves as a federal judge. This error foreclosed any possibility of obtaining or considering the sentencing judge's attitude toward parole, a factor expressly required by Form 1212. Because this information was never obtained or presented, the Board was unable to accurately evaluate that criterion. Second, the parole file included unsubstantiated and refutable allegations, including references to a purported confession and allegations of institutional misconduct, without verification or supporting documentation. These assertions were presented as part of the evidentiary record despite their questionable reliability. Because each of these inaccuracies directly correspond to parole criteria (the attitudes of the sentencing judge, Appellant's attitudes towards the crime, and Appellant's institutional record), they present more than just immaterial errors.

c. Because the parole file was unreliable and materially incomplete, the Board could not have considered the required parole criteria.

The Board cannot meaningfully consider parole criteria for which the underlying evidentiary record is incomplete, distorted, or selectively developed. Appellant does not challenge the weight the Board assigned to the evidence; rather, he asserts challenges the Agency's failure to

provide the Board with sufficient information necessary to exercise their discretion in the first place. Where the Agency fails to provide the information necessary to evaluate required criteria, the Board's decision is not an exercise of discretion at all, but the product of an unreliable, one-sided record. Accordingly, because the Agency failed to present the Board with a complete and reliable record necessary to consider the required criteria, the resulting decision was not based on careful review of those criteria.

II. SCDPPPS violated Appellant's due process rights by maintaining procedures that prevent meaningful review and rebuttal of false or misleading information.

Even where parole is discretionary, due process requires a meaningful opportunity to review and respond to information used to make the decision. *See Kelsey*, 441 S.C. at 382-83, 893 S.E.2d at 593 (recognizing the importance of an inmate's ability to review the parole file to identify errors). Current SCDPPPS procedure permits file review only immediately before the hearing, often leaving insufficient time to identify inaccuracies and gather or provide rebuttal documentation. Compounding these limitations, the victim portion of the parole file was produced in an entirely redacted form. While certain victim information may be appropriately protected, complete redactions that are not narrowly tailored deprive an inmate of a meaningful opportunity to assess the accuracy and completeness of the information presented to the Board.

In the present case, Appellant and his attorney were afforded less than one hour to review the parole file prior to the hearing. During that limited review, Appellant and his attorney identified the material inaccuracies described in this Brief. However, they had no meaningful opportunity to investigate those issues, obtain documentary evidence, or submit corrections to the Agency before the Board rendered its decision. This lack of meaningful review is compounded by the practical limitations imposed by the setting. Counsel was required to view the file at the correctional institution on the day of the hearing, where access to technology is restricted. Notably, certain inaccuracies, such as the reference to an alleged escape plan, were not merely speculative errors, but claims that could have been affirmatively disproven through institutional records had Appellant been given adequate time and opportunity to do so during the hearing. Other deficiencies, such as the absence of victim input or the sentencing judge's input, were not issues Appellant could independently remedy, but instead reflect investigative responsibilities assigned to the Agency.

By failing to fulfill those responsibilities and then providing no meaningful opportunity for Appellant to provide corrective evidence to the Board, the Agency effectively insulated its own

investigative errors from meaningful correction. South Carolina courts have recognized that inaccuracies in a parole file may not warrant relief where the Board is presented with corrective evidence and afforded an opportunity to reconsider its decision. *See Blackwell*, Op. No. 2024-UP-211 (finding no prejudicial due process violation where the Board had access to corrective evidence and an opportunity to reconsider its decision). Here, by contrast, the inaccuracies and omissions in Appellant's file were not corrected prior to the Board's decision, nor was Appellant afforded any meaningful opportunity to ensure that they were.

Under these circumstances, Appellant's opportunity to respond was illusory at best. A procedure that permits nominal review while shielding critical portions of the record from meaningful scrutiny and foreclosing any realistic opportunity to rebut material inaccuracies constitutes unlawful procedure and results in a decision that is arbitrary and affected by error of law. *See* S.C. Code Ann. § 1-23-380(5)(c), (d), (f). The procedures in place therefore violated Appellant's due process rights.

CONCLUSION

For the foregoing reasons, Appellant respectfully requests the Administrative Law Court: (1) reverse the final decision of the Parole Board; and (2) remand this case to SCDPPPS for timely re-investigation and correction of the parole file; and (3) remand this case to the Board for reconsideration of the corrected parole file, with instructions not inconsistent with this Court's determination; and (4) provide any other relief that the Court deems just and proper.

Respectfully Submitted,

s/ Megan Powell

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April 3, 2026.
Greenville, South Carolina.

STATE OF SOUTH CAROLINA
In the Administrative Law Court
Docket Number 25-ALJ-15-0034

APPEAL OF FINAL DECISION
Department of Probation, Parole and Pardon Services

STEPHEN BECKHAM, #236548.....APPELLANT

v.

S.C. DEPARTMENT OF PROBATION, PAROLE AND
PARDON SERVICES,.....RESPONDENT

BRIEF OF RESPONDENT

Matthew Buchanan
General Counsel

**South Carolina Department of Probation,
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ATTORNEY FOR RESPONDENT

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STATEMENT OF ISSUE ON APPEAL

- 1. This Court may only consider this appeal beyond determining whether the Parole Board followed the procedure in *Cooper*?**
- 2. Does this Court have the authority to determine whether a parole file is complete when the inmate has been allowed to review the file and report any perceived inaccuracies to the Board?**
- 3. Is due process implicated by providing the parole file to the inmate ahead of the hearing per *Kelsey* when the inmate has no due process rights to view the file?**

STATEMENT OF THE CASE

On June 12, 1994, a Newberry County sheriff's deputy responded to a single-vehicle wreck in Little Mountain with a fatality. The deputy noticed the victim possessed injuries not consistent with the traffic accident, so an investigation began. After a one-year investigation, authorities arrested Richard George Anderson, who cooperated and informed investigators that he had been hired by the victim's estranged husband, Appellant Stephen Beckham, to assist with the murder. He told them that Appellant had brought his badly beaten wife to an arranged location where they murdered her and staged the accident to cover up the murder. Based on Mr. Anderson's confession, Appellant was arrested.

After a trial, Appellant was convicted for murder, kidnapping, and conspiracy on October 4, 1996. The Honorable Henry F. Floyd sentenced him to life in prison, and because of aggravated factors Appellant would not be parole eligible for thirty years.

Appellant appeared before the Parole Board for his first opportunity on November 19, 2025. The Board unanimously denied parole to Appellant due to: 1) the nature and seriousness of the current offense, and 2) indication of violence in this or previous offense. R. 1. Appellant then filed a request for reconsideration, alleging factual inaccuracies in the file and procedural errors as it relates to victim notification. R. 3-6. On December 30, 2025, Respondent denied the request for reconsideration. R. 20.

Appellant subsequently filed a notice of appeal before the Administrative Law Court (ALC). Within this notice of appeal the Appellant argues similarly that the alleged factual inaccuracies violate due process and that Respondent's procedures in providing for inmate review of their parole files also violate due process.

Respondent will argue that this Court is limited in its authority to hear routine denials of parole, that Appellant was given an opportunity to inform the Board of inaccuracies in his parole file thus satisfying the requirements of *Kelsey v. S.C. Dept. of Probation, Parole and Pardon Services*, 441 S.C. 373, 893 S.E.2d 588 (Ct. App. 2023) (cert. denied March 5, 2024), and that the Board followed the requirements of *Cooper v. South Carolina Dept. of Probation, Parole and Pardon Services*, 377 S.C. 489, 661 S.E.2d 106 (2008). The brief of the Respondent follows.

STANDARD OF REVIEW

When reviewing a parole case, the ALC sits in an appellate capacity. *Furtick v. S.C. Dept. of Prob., Parole & Pardon Servs.*, 352 S.C. 594, 576 S.E.2d 146 (2004). However, “an administrative law judge shall not hear... an appeal involving the denial of parole to a potentially eligible inmate by the Department of Probation, Parole and Pardon Services.” S.C. Code Ann. § 1-23-600(D). Inmates who are denied parole and petition the Administrative Law Court (ALC) are limited to review of whether the Board complied with procedures as outlined in *Cooper v. South Carolina Dept. of Probation, Parole and Pardon Services*, 377 S.C. 489, 661 S.E.2d 106 (2008).

ARGUMENTS

1. Because this is a routine denial of parole, this court cannot entertain this appeal.

Respondent respectfully would argue that the Parole Board has complied with the procedures as outlined in *Cooper*, and as such, this Court must dismiss the appeal.

The South Carolina Supreme Court in *Cooper* held that if the notice of rejection clearly states that the Board carefully considered the factors published in Department Form 1212,¹ the

¹ R. 2.

factors outlined in S.C. Code Ann. § 24-24-640 and 24-21-10(F)(1), and consideration of the actuarial needs assessment, the ALC will have limited authority to hear the appeal. This holding was clarified in *Compton v. South Carolina Dept. of Probation, Parole and Pardon Services*, 385 S.C. 476, 685 S.E.2d 175 (2009). In *Compton*, the Supreme Court stated that if the Board follows the procedure in *Cooper* its decision will be considered a routine denial of parole. *Id.*, 385 S.C. at 479, 685 S.E.2d at 177. Because the procedures outlined in *Cooper* were followed, the Board's decision is a routine denial of parole and this Court will have limited authority to review the matter. Therefore, Appellant's parole denial must stand and this appeal must be dismissed.

Appellant argues that his parole file contained inaccuracies and those alleged inaccuracies implicate due process. This is incorrect. Inmates considered for parole do not have a right to parole, and further the only process due them is what is outlined in statute and *Cooper*. Respondent submits that this was met in the Board's letter of rejection which states that they carefully considered the requisite factors. R. 1.

2. This Court does not have the authority to determine whether an inmate's parole file was complete and further Appellant was able to address the Board and report any inaccuracies.

Appellant argues that the parole file was incomplete by claiming that certain victims were not given proper follow-up contact by Respondent and that the sentencing judge was listed incorrectly in the parole file. Respondent would instead argue that this Court is not tasked with ruling upon what makes a materially complete parole file. Any order remanding this case to correct minor errors that could have been raised during the hearing by the inmate is beyond the limited jurisdiction of this Court in parole matters.

The Court of Appeals ruled in *Kelsey* that because of the language in the Department Form 1212 indicating that inmates should raise any perceived inaccuracies to the Board, that implied the

right to review their file. *Id.* at 378, 893 S.E.2d at 591. However, nowhere in the opinion did the Court say that when errors are found by the inmate, the appellate courts must remand for correction and re-investigation as Appellant demands.

Appellant first claims inconsistencies regarding victim notification. Yet, he concedes that Respondent complied with its statutory duties as it relates to providing written notice of the hearing. Brief of Appellant, p. 6. Further, the victim in favor of parole for Appellant appeared on his behalf and was given time to speak. R. 20.

Respondent concedes that Judge Henry Floyd was inadvertently listed as Judge Sidney Floyd in the file but would argue such an error does not affect the decision by the Parole Board. The 30-day notification requirement for parole hearings applies to victims, solicitors, and law enforcement agencies, but not judges. S.C. Code § 24-21-221. Instead, the only time the trial judge must be notified is when the Board actually awards parole. See S.C. Code § 24-21-610. “In all cases cognizable under this chapter the Board may, upon ten days’ written notice to the solicitor and judge who participated in the trial of any prisoner, parole a prisoner...”

Appellant ties these inadvertent yet harmless omissions to the criteria for parole consideration and argues that the Board’s decision is invalidated. In essence, Appellant is demanding absolute perfection in a parole packet and arguing anything short of that must require a remand. The holding of *Kelsey* is limited to allowing an inmate review his or her file and to report any perceived inaccuracies to the Board. It does not hold that any error or omission alleged by the inmate must require a remand, especially when the inmate has the opportunity to report it to the Board.

Respondent submits that the Court of Appeals’ intention when it ruled that inmates should have the ability to review their files and report inaccuracies based on the language of Form 1212

was not to burden the ALC with a flood of appeals asking for remands based on perceived errors or technicalities. Importantly, even in criminal trials where defendants' due process rights are at their highest, errors do not automatically require reversal. See *State v. Rivera*, 402 S.C. 225, 246, 741 S.E.2d 694, 705 (2013) "Most trial errors, even those which violate a defendant's constitutional rights, are subject to harmless-error analysis." Parole consideration hearings, in which in contrast inmates have due process rights at their lowest ebb, should not face remand any time an inmate discovers a technical error in his file.

3. The requirements of *Kelsey* were met by giving Appellant and his attorneys access to his file before his hearing so that he could report any perceived inaccuracies to the Board.

Appellant argues that his due process rights are violated because he was given access to his file before his hearing instead of months prior to the hearing which would allow him to challenge the facts found within. Respondent submits that there are no due process rights afforded to inmates to review their files; the *Kelsey* ruling was based solely upon the language of Department Form 1212. "[W]e find the language of Form 1212 requiring an inmate to notify the Board if his or her file is incorrect necessarily implies the right to review the file." *Id.* at 378, 893 S.E.2d at 591.

Due process rights only attach when an inmate has an actual liberty interest. Inmates do not have the right to receive parole. See *Sullivan v. South Carolina Dep't of Corrections*, 355 S.C. 437, 443 n. 4, 586 S.E.2d 124, 127 n. 4 (2003). Furthermore, "a prisoner must identify a cognizable liberty interest before he can demonstrate a denial of due process." *Bowling v. Dir, Virginia Dep't of Corr.*, 920 F.3d 192, 199 (4th Cir. 2019). Notably, the Fourth Circuit held that inmates do not

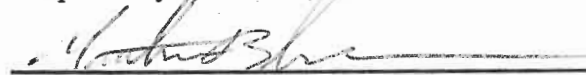
have a constitutionally protected right of access to their prison files. *Franklin v. Shields*, 569 F.2d 800 (4th Cir. 1978) *Cert. denied*, 435 U.S. 1003 (1978).

Appellant asserts that he has a due process right to both review his file months in advance so that he may investigate the information within the file and presumably litigate any disputed facts so that the parole file only contains information that he approves of. This is wishful thinking and a massive overreach of the clear and limited holding of *Kelsey*. This appeal should therefore be dismissed.

CONCLUSION

The Parole Board followed the requirements of *Cooper* and *Compton* by clearly stating in its letter of parole denial that it considered all the requisite factors of parole consideration. R. 1. Further, Appellant was provided the opportunity to review his parole file before the hearing and to report any perceived inaccuracies to the Board. For these reasons, Respondent respectfully requests the final decision of the South Carolina Department of Probation, Parole and Pardon Services be affirmed.

Respectfully submitted,



Matthew Buchanan
General Counsel

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Columbia, South Carolina
April 21, 2026

STATE OF SOUTH CAROLINA
In the Administrative Law Court
Docket No. 25-ALJ-15-0034

APPEAL OF FINAL DECISION
Department of Probation, Parole and Pardon Services

STEPHEN BECKHAM, #236548, APPELLANT,

v.

S.C. DEPARTMENT OF PROBATION, PAROLE AND
PARDON SERVICES RESPONDENT.

REPLY BRIEF OF APPELLANT

Rather than appealing a denial of parole with a properly developed record, Appellant is challenging the antecedent failures of the Agency that resulted in an inaccurate and misleading parole file: the Agency presented the Board with a parole file that was materially inaccurate and selectively developed, and its procedures denied Appellant any meaningful opportunity to identify and rebut those defects before the Board ruled. The substantial and unique failures of the Agency in preparing Appellant's parole file were both material to the Board's decision-making process and impossible to correct the morning of the hearing.

ARGUMENT

I. Appellant's claims are not foreclosed by the "routine denial" framework of *Cooper and Compton*.

Respondent would extend *Cooper* and *Compton* to appeals regarding procedural challenges to the Agency's parole investigation and file preparation process. Before inmates ever had access to their parole files, *Cooper* and *Compton* established that, when the Board has properly considered the criteria set forth in Form 1212 and S.C. Code Ann. § 24-21-640 (2025), this Court will not second-guess the Board's weighing of those factors. *See Cooper v. S.C. Dep't of Prob., Parole & Pardon Servs.*, 377 S.C. 489, 499, 661 S.E.2d 106, 112 (2008); *Compton v. S.C. Dep't of Prob., Parole & Pardon Servs.*, 385 S.C. 476, 479, 685 S.E.2d 175, 177 (2009). These decisions do not,

however, insulate from review an **agency's** failure to assemble that record in the first place. Appellant does not ask this Court to re-weigh evidence; he challenges the prior, threshold issue of whether the record before the Board permitted consideration of the required criteria.

This Court retains jurisdiction under the Administrative Procedures Act (“APA”) to review final agency decisions implicating due process. *Al-Shabazz v. State*, 338 S.C. 354, 369, 527 S.E.2d 742, 750 (2000). Inmates have a state-created liberty interest in a statutorily compliant parole review. *Barton v. S.C. Dep’t of Prob., Parole & Pardon Servs.*, 404 S.C. 395, 413, 745 S.E.2d 110, 120 (2013). That liberty interest is necessarily implicated when the Agency fails to carry out the investigative duties required to produce a statutorily compliant record on which the Board may rely. Respondent’s position leaves inmates with no recourse under *Al-Shabazz* and *Barton* when the Agency presents the Board with a materially defective record. The APA expressly authorizes reversal where an agency decision is in violation of constitutional or statutory provisions, made upon unlawful procedures, affected by other error of law, or are arbitrary. S.C. Code Ann. § 1-23-380(5)(a), (c), (d), (f) (2025).

II. The inaccuracies and investigative omissions in the parole file are material to the Board’s decision-making process.

Rather than correcting Appellant’s parole file before his next hearing or granting Appellant a rehearing after correcting the omissions and errors in Appellant’s parole file, Respondent would ask this Court to apply the harmless-error analysis under *State v. Rivera*, 402 S.C. 225, 741 S.E.2d 694 (2013). Such an approach would place this Court in the unenviable position of assessing materiality after a black-box decision-making process and on profoundly limited records on appeal. Instead, this Court could simply require the Agency to satisfy its statutory obligations and course correct after identifying known errors or omissions.

As described herein, even if this Court were to apply a harmless-error test, the errors and omissions in Appellant’s parole file were material to the Board’s decision-making process.

a. The Agency’s selective solicitation of confidential written victim input was arbitrary.

Before Appellant’s hearing ever occurred, the Agency engaged in a victim outreach process that excluded the closest kin of the victim: her three adult children. Each of the three is a legally recognized victim under the South Carolina Victims’ Bill of Rights, S.C. Const. art. I, § 24(C)(2), and each supported Appellant’s parole. It appears that the Agency did, however, solicit input during

the pre-hearing investigative process from other, more distant victims, which was then incorporated in the parole file and provided to the Board for review in advance of the parole hearing. The children, by contrast, were relegated to providing limited oral feedback at the hearing itself, presented under circumstances so emotionally charged that one of them was unable to speak coherently. Respondent appears to believe that the opportunity to attend the hearing cured the Agency's exclusion of them from the pre-hearing investigation process, but attendance at the hearing offers no substitute for inclusion in the confidential investigative record before the Board, particularly where the emotional weight of live testimony renders full participation by a legally recognized victim inaccessible.

Relevant to this appeal, Appellant challenges the arbitrariness of the Agency's separate, investigative-stage process for soliciting confidential written victim input for inclusion in the parole file. Respondent has identified no neutral standard by which the Agency selected which victims to invite into the investigative-stage process and which to omit. Selective development of the evidentiary record, without a discernible standard governing whose input is solicited and whose is not, is arbitrary agency action. *See Porter v. S.C. Pub. Serv. Comm'n*, 333 S.C. 12, 21, 507 S.E.2d 328, 332 (1998). And because victim impact is a parole criterion every party agrees the Board must consider, an arbitrarily compiled record on that criterion deprived the Board of the reliable, probative, and substantial evidence the APA requires. S.C. Code Ann. § 1-23-380(5)(e) (2025).

b. Misidentifying the sentencing judge precluded consideration of a Form 1212 criterion for parole consideration.

Form 1212 expressly identifies the attitudes of the sentencing judge regarding parole as a criterion the Board is required to consider. Respondent concedes that Judge Henry Floyd was inadvertently listed as Judge Sidney Floyd in the file, but contends this error is irrelevant because judges are not entitled to thirty days' notice of a parole hearing. S.C. Code Ann. §§ 24-21-221. Regardless of the Agency's statutory duty to inform sentencing judges of a grant of parole (as required by S.C. Code Ann. § 24-21-610 (2025)), the Agency has created for itself an additional duty to solicit the attitudes of the sentencing judge during the pre-hearing investigation because the Agency's own Form 1212 requires the Board to consider that information before making its decision. Misidentifying the sentencing judge in Appellant's case foreclosed any possibility of obtaining or considering that input, raising concerns as to whether this required factor was capable

of being evaluated at all. If this Court is inclined to assess harmlessness or materiality, Appellant would argue that errors directly related to the explicit criteria for parole consideration should be deemed material.

III. *Kelsey* requires a meaningful opportunity to identify and rebut inaccuracies which Respondent’s reading renders illusory.

Kelsey v. S.C. Dep’t of Prob., Parole & Pardon Servs., 441 S.C. 373, 893 S.E.2d 588 (Ct. App. 2023), recognized that an inmate has the right to review the parole file and identify inaccuracies in advance of the hearing. That right exists against the backdrop of the state-created liberty interest recognized in *Barton* and in South Carolina’s statutory framework requiring development and consideration of specific parole criteria. Once a state creates such an entitlement, the procedures used to administer it must comport with state and federal due process. The Court of Appeals located that procedural protection in the directive of Form 1212 itself, which instructs inmates to identify any inaccuracies in the file: “We find the language of Form 1212 requiring an inmate to notify the Board if his or her file is incorrect *necessarily implies* the right to review the file.” *Kelsey*, 441 S.C. at 378, 893 S.E.2d at 591 (emphasis added). A right grounded in the duty to flag inaccuracies must, by its own logic, be meaningful enough to permit that duty to be discharged.

A reading of *Kelsey* that requires nothing more than perfunctory “access” to the file at some point before the hearing strips that meaning away and reduces the right to a formality. Appellant’s case illustrates the problem with such a limited reading and exemplifies why a less-than-one-hour review on the morning of the hearing, conducted at a correctional institution with restricted access to technology and records, of a file in which the entire victim portion has been redacted, is not the opportunity *Kelsey* contemplates. While similar appeals of parole denials based on inaccurate or incomplete parole files exist, the outreach errors in Appellant’s parole file are unique in that they could not be identified before the hearing, nor could they be remedied by Appellant at all once they had been identified. *Cf. Blackwell v. S.C. Dep’t of Prob., Parole & Pardon Servs.*, Op. No. 2024-UP-211 (S.C. Ct. App. filed June 12, 2024) (finding no prejudicial due process violation resulted from inaccurate parole file information *because* the Board had access to, and an opportunity to reconsider its decision after reviewing, corrective evidence).

CONCLUSION

For the reasons set forth above and in his Initial Brief, Appellant respectfully requests that this Court (1) reverse the final decision of the Parole Board; (2) remand to SCDPPPS for timely

re-investigation and correction of the parole file; (3) remand to the Board for reconsideration of the corrected parole file consistent with this Court's determination; and (4) grant any other relief the Court deems just and proper.

Respectfully Submitted,

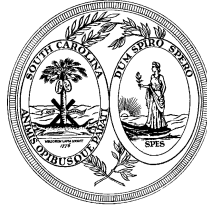
s/ Megan Powell

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May 4, 2026.
Greenville, South Carolina.

State of South Carolina
Department of Probation, Parole and Pardon Services

HENRY McMASTER
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November 19, 2025

Mr. Stephen Beckham #00236548
Tyger River Correctional Inst.
200 Prison Road
Enoree, SC 29335-9309

RE: NOTICE OF REJECTION

Dear Mr. Beckham:

It is my responsibility to inform you, on behalf of the South Carolina Parole Board, that the Board has reached a decision regarding your parole hearing. The Board hereby makes the following CONCLUSION OF LAW:

After careful consideration of: (1) the characteristics of your current offense(s), prior offense(s), prior supervision history, prison disciplinary record, and/or prior criminal record, as described in the findings of fact below; (2) the factors published in Department Form 1212 (Criteria for Parole Consideration); (3) the factors outlined in Section 24-21-640 of the South Carolina Code of Laws, and (4) actuarial risk and needs assessment factors pursuant to Section 24-21-10 (F) (1) of the South Carolina Code of Laws. The Parole Board had determined that your parole must be denied.

You will be notified 30 days prior to your next scheduled parole consideration date.

FINDINGS OF FACT:

01 Nature And Seriousness Of Current Offense
02 Indication Of Violence In This Or Previous Offense
Vote Count: Unanimous To Reject

Sincerely,

Katrina Canada
Asst. Deputy Director for Parole Board and Release Services

ROA031

11/19/2025

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December 3, 2025

SCDPPPS
P.O. Box 207
Columbia, SC 29202

Re: Request for Correction and Reconsideration of Stephen Beckham's Parole File

To Whom It May Concern:

My name is Megan Powell, and I am a legal aid attorney with Time Served. I represented Mr. Stephen Beckham, #00236548, in his parole hearing on November 19, 2025. For the reasons set forth below, we respectfully request:

- 1) Correction of the factual inaccuracies in Mr. Beckham's parole file;
- 2) Reconsideration of the Board's decision and a re-hearing consistent with corrected information; and
- 3) An opportunity for counsel to submit corrective and mitigating documentation for the Board's consideration prior to the re-hearing.

I. Factual Inaccuracies in the Parole File

As documented on both the Acknowledgement of Parole File Review (attached) and the annotated copy of the parole file that was provided to us at the institution, Mr. Beckham's parole file contains several material inaccuracies. These errors directly affected the Board's evaluation and undermine the procedural fairness of the proceeding.

Most notably, the summary of the facts of the offense incorrectly states that Mr. Beckham confessed to police after his arrest. This statement is factually incorrect. Mr. Beckham has consistently maintained his innocence, including throughout his multi-week, televised capital trial. No confession appears in any discovery, investigative record, or law enforcement document known to counsel. We respectfully request that the Agency remove this statement from the file or identify the source of the inaccurate information.

The parole file also misidentifies the sentencing judge as "Sidney Floyd, deceased." The correct sentencing judge was the Honorable Henry F. Floyd, who is alive and currently serving as a federal district court judge in South Carolina. Because the Agency misidentified the sentencing judge, the correct sentencing judge was never contacted during the parole investigation, and the

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Board therefore lacked information relevant to its's own self-promulgated factor: "the opinion of the sentencing judge, the solicitor, and local law enforcement on the offender's parole."

As a result, the Board rendered its decision without having before it all required evaluative criteria.

II. The Agency's Procedures Prevented Mr. Beckham From Presenting Corrective or Mitigating Documentation

Under the Agency's current policy, parole files may only be reviewed on the day of the hearing, sometimes mere minutes before appearance before the Board. In cases such as this, where the file contains material inaccuracies, parole applicants and counsel have no meaningful way to supplement the record or provide rebuttal documentation before the Board makes its decision.

Upon review of Mr. Beckham's parole file, we immediately documented the errors (including those listed in Section I of this letter), requested correction, and raised the errors orally during the hearing. However, we had no meaningful opportunity to submit documentary evidence necessary to correct or mitigate misinformation in the file. For example, law enforcement asserted that Mr. Beckham aided in an escape plot while incarcerated. This allegation is unequivocally false and can be disproven through readily available documentation. While Counsel recognizes that the Agency cannot control the content of law enforcement or victim opposition, Mr. Beckham should have been afforded an adequate opportunity to provide documentation to rebut damaging false claims *prior* to the parole hearing, so that the Board has access to all information at the same time.

III. Failure to Comply With the South Carolina Victims' Bill of Rights for Shannon Beckham Berley, Andrew Beckham, and Samuel Beckham

Reconsideration is also warranted because the Agency failed to comply with the procedural protections guaranteed to victims under both the Parole Board Manual and Article I, § 24 of the South Carolina Constitution (hereinafter "Victims' Bill of Rights").

Shannon Beckham Berley, Andrew Beckham, and Samuel Beckham are the three children of the late victim, Victoria Lander Beckham. Pursuant to the South Carolina Constitution, Shannon, Andrew, and Samuel are legally recognized as victims of this crime and are entitled to receive notice and the opportunity to submit written victim impact statements before a parole hearing. Despite this, none of the three children were contacted by the Agency and asked to provide a written victim impact statement during the parole investigation and preparation of the parole file. No effort was made to notify the victims of the investigation,

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solicit their statements, or inform them of their constitutional rights. In fact, the only contact occurred because Mr. Beckham himself listed his daughter Shannon as his next of kin and asked the investigator to reach out to her. During that conversation, the investigator did not appear to know that Shannon's mother was the deceased victim, and Shannon was never advised of her rights as a victim under the Constitution.

Only on the day of the hearing, during a highly emotional and time-limited proceeding, were the victims able to speak for themselves. One child was so overwhelmed they were unable to give their statement personally and required a third party to read it. Their constitutional rights to participate meaningfully in the process were not respected. Despite failing to contact the actual victims, the Agency accepted a statement from law enforcement submitted "on behalf of the Lander family and Vickie's children." This statement was prepared without any input from the Beckham children and directly contradicts their own views. Because the Agency failed to solicit or include the legally authorized victim impact statements of Shannon, Andrew, and Samuel, the Board's consideration of the criteria relating to victim input and family involvement was incomplete and fundamentally flawed.

IV. Legal Grounds and Request for Relief

Reconsideration is appropriate because the errors described above deprived Mr. Beckham of a fair, accurate, and meaningful parole hearing, contrary to constitutional, statutory, and administrative requirements. Due process principles require accurate information and a meaningful opportunity to respond, and South Carolina law recognizes that parole decisions, while discretionary, must be based on reasonable, supported, and accurate information. Here, the Board relied on demonstrably false information without providing any mechanism for counsel to rebut the inaccuracies outside of verbal corrections. Further, the Board rendered its decision without considering at least 4 of the mandatory evaluative criteria set forth in the Parole Board Manual.

For the reasons stated above, we respectfully ask that the Agency:

1. Correct all factual inaccuracies in Mr. Beckham's parole file, including removal of the false confession reference, correction of the sentencing judge's identity, and correction or striking of the unverified escape-plot allegation;
2. Re-open the victim notification and input process, providing written notice and a formal opportunity for Shannon Berley, Andrew Beckham, and Samuel Beckham to submit their constitutionally guaranteed victim impact statements;
3. Permit counsel to submit the attached corrective and mitigating documentation for inclusion in the file; and

TIME SERVED

(864) 546-5060 | www.timeserved-sc.org



Office Address
222 Rutherford St.
Greenville, SC 29609

Mailing Address
P.O. Box 615
Taylors, SC 29687

4. Schedule a new parole hearing at which the Board will consider Mr. Beckham's parole using accurate, verified information and all required evaluative criteria.

We appreciate the Agency's attention to these matters and stand ready to provide any additional documentation or sworn materials the Department may require.

Respectfully submitted,

A handwritten signature in blue ink that reads "Megan Powell".

Megan Powell
Attorney for Stephen Beckham
Deputy Director, Time Served
mpowell@tsscnw.org
(864) 546-5060

cc: Stephen Beckham, #00236548 (by mail), Shannon Berley (by email)

Attachments:

Exhibit A..... Acknowledgement of Parole File Review, November 19, 2025
Exhibit B..... Affidavit of Shannon Beckham Berley
Exhibit C..... Excerpt,
Order Vacating Sentence for Kidnapping and Denying All Other Post-Conviction Relief Claims,
2000-CP-36-0051 (included for purpose of identifying sentencing judge)
Exhibit D S.C. Dept. of Corrections Internal Message and Memorandum
Exhibit E..... October 10, 2025 letter
from SCDPPPS Victim Services to Shannon Beckham Berley, received on October 14, 2025

EXHIBIT A

South Carolina Department of Probation, Parole and Pardon Services
Acknowledgement of Parole File Review

SC Department of Probation, Parole and Pardon Services
P.O. Box 207 Columbia, SC 29202

Inmate Name BECKHAM, STEPHEN ANDREW	SCDC# 00236548
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The "Parole File" is defined as information compiled by the Agency for review by the SC Board of Pardons and Paroles in the course of their duty to consider cases for parole.

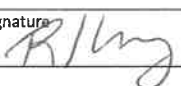
Information received from the inmate or third parties is not a part of the Agency's presentation and for the purpose of sharing parole files for review will not be reproduced.

All Victim information is redacted.

Regarding the hearing scheduled for (Hearing Date) **November 19, 2025**, the above-identified inmate and/or his attorney are permitted to review the parole file as prepared by the SC Department of Probation, Parole and Pardon Services.

The undersigned parties acknowledge the Agency's definition of parole file and understand that any alleged discrepancies identified within the parole file will be documented and may be addressed during the active hearing with the Board. The Agency is not obligated to alter facts or details which are unsubstantiated by official records. The Board maintains full discretion to grant or deny parole, based on their established criteria.

I certify that the above has been explained to me, and upon acknowledgement I have been granted access to review the Parole File

Inmate's Signature 	Date 11-19-25	Attorney Signature 	Date 11-19-25
SCDPPPS Witness Signature 	Date 11-19-25	Other Witness Signature (Optional)	Date



The inmate requests a review and corrections of the file.

☐

The inmate declined to review the parole file.

Inmate's Signature	Date	Attorney Signature	Date
SCDPPPS Witness Signature	Date	Other Witness Signature (Optional)	Date

EXHIBIT B

Affidavit of Shannon Beckham Berley

I, Shannon Beckham Berley, hereby declare under penalty of perjury that the following is true and correct to the best of my knowledge:

- 1) My name is Shannon Beckham Berley.
- 2) I am the oldest child of Stephen Andrew Beckham and the late Victoria Lander Beckham.
- 3) My mother Victoria Lander Beckham was murdered in Newberry County on June 12, 1994.
- 4) Richard George Anderson and my father, Stephen Andrew Beckham, were both convicted of my mother's murder. Richard Anderson confessed to the murder. My father was convicted at trial of hiring Richard Anderson to kill my mother.
- 5) I testified at my father's trial, and there are official court records that show that my mother was the victim of this crime.
- 6) The first time I was contacted by the South Carolina Department of Probation, Parole, and Pardon Services ("SCDPPPS") with regard to my father's parole hearing was on or around February 23, 2024.
- 7) On or around February 23, 2024, I was contacted by phone by SCDPPPS Investigator Osbey. Investigator Osbey only contacted me because my father had listed me as his next of kin during his parole examination. Investigator Osbey did not know I was a victim witness, nor that I was the child of the victim of this crime.
- 8) I was never asked to provide any written testimony by SCDPPPS Victim Services or an SCDPPPS Investigator with regard to my father's parole.
- 9) Prior to my father's parole hearing, the only contact I had with SCDPPPS Victim Services regarding his parole hearing was a letter I received on October 14, 2025, informing me of his parole hearing date.
- 10) I would have gladly provided SCDPPPS and Investigators with my feelings and testimony regarding my father's parole hearing in advance of the hearing if I had been contacted by SCDPPPS prior to the hearing notice letter I received in the mail on October 14, 2025.


[Name]

SWORN to before me this 2 day of
December, 2025.

Lisa M. Duncan
Signature

Lisa M. Duncan
Print Name
Notary Public for South Carolina
My Commission Expires: 3/25/2035



EXHIBIT C

STATE OF SOUTH CAROLINA)
COUNTY OF NEWBERRY)
Stephen Andrew Beckham, 236548)
Applicant,)
vs.)
State of South Carolina,)
Respondent.)

IN THE COURT OF COMMON PLEAS
FOR THE EIGHT JUDICIAL CIRCUIT
Case No: 2000-CP-36-0051

**ORDER VACATING SENTENCE FOR
KIDNAPPING AND DENYING ALL OTHER
POST-CONVICTION RELIEF CLAIMS**

FILED
NEWBERRY COUNTY
SEP - 8 A 10:25
JESSIE S. BOWERS
CLERK OF COURT

This matter comes before the Court by way of an application for post-conviction relief filed February 15, 2000, and subsequently amended as further described below. The Respondent filed its Return on April 20, 2000, and subsequently amended as further described below. An evidentiary hearing into this matter was convened on September 28-30, 2010, followed by depositions in lieu of live testimony that concluded on November 11, 2010. The Applicant was present at the hearing and was represented by Diana L. Holt, Esquire, Charles Grose, Jr., Esquire, and Tara M. Schultz, Esquire. Jennifer A. Kinzefer, Esquire, and Salley W. Elliott, Esquire, of the South Carolina Attorney General's Office, were present on behalf of the Respondent.

PROCEDURAL HISTORY

Underlying Convictions

The Applicant is presently confined in the South Carolina Department of Corrections pursuant to orders of commitment of the Clerk of Court for Newberry County. The Applicant was indicted at the January 1996 term of the Court of General Sessions for Newberry County for

murder, conspiracy, and kidnapping. Jack B. Swerling, Esquire and Richard A. Harpootlian, Esquire, represented him.

The Applicant proceeded to a jury trial before the Honorable Henry F. Floyd from September 19, 1996 through October 4, 1996¹. At the conclusion of the guilt phase, the jury returned a unanimous verdict finding the Applicant guilty of all three offenses as indicted. (Trial Tr. p. 5118). At the conclusion of the sentencing phase, the jury unanimously found beyond a reasonable doubt the existence of the following aggravating circumstances: 1) the murder was committed while in the commission of a kidnapping, 2) the murder was committed while the victim was subjected to physical torture, and 3) the defendant caused or directed another to commit murder, and, having found the aforementioned aggravating circumstances beyond a reasonable doubt, unanimously recommended the punishment of life imprisonment. (Trial Tr. p. 5724-5725). The jurors confirmed on the record this was in fact their verdict. (Trial Tr. p. 5725). The Applicant was sentenced to confinement for life for murder, thirty (30) years for kidnapping, and five (5) years for conspiracy, sentences running concurrently. (Tr. p. 5729).

A Notice of Appeal was filed and served on Applicant's behalf and an appeal was perfected. The South Carolina Supreme Court affirmed Applicant's convictions and sentences. State v. Beckham, 334 S.C. 302, 513 S.E.2d 606 (1999) (filed February 22, 1999).

Post-Conviction Relief

Applications, Returns, and Motions

The Applicant filed his first application for post-conviction relief on February, 15, 2000. Diana L. Holt, Esquire, was appointed to represent the Applicant on May 18, 2001. Thereafter, the Applicant moved for discovery pursuant to §17-27-150(A) in this non-capital post-conviction relief

¹ Jury selection took place from September 14, 1996 through September 18, 1996. (Tr. p. 1-1306). The guilt phase of the trial began on the afternoon of September 19, 1996. (Tr. p. 1307).

EXHIBIT D

SOUTH CAROLINA DEPARTMENT OF CORRECTIONS

McCORMICK CORRECTIONAL INSTITUTION

MEMORANDUM

TO: Leroy Cartledge, Warden
FROM: Jessica Jimenez, SMU Caseworker
DATE: June 25, 2013
SUBJECT: Inmate Stephen Beckham #236548

The following outlines my justification for recommending inmate Stephen Beckham SCDC# 236548 to be released from SMU:

- Inmate Beckham was originally placed in SMU due to an aiding and abetting charge on November 1, 2005. Per policy OP-21.04 "Class I escapes must serve a minimum of 18 months in SMU, which can be a combination of SD and DD."
- Inmate Beckham has served a total of 2,793 days in SMU. Respectfully, 7 years, 9 months, and 3 days.
- Of these 2,793 days in SMU, inmate Beckham has not had one disciplinary.
- [REDACTED]
- Senator Ralph Anderson, Rep. Walter McLeod, and retired Senator Jim Landers have all requested for inmate Beckham to be released from SMU to no avail. Senator Jim Lander is the victim's father.
- The average time an inmate spends in SMU due to Class I Escape is 662 days (McCI Statistics-attached). Stephen Beckham has spent four times the average amount other inmates spend in SMU.
- Stephen Beckham is 54 years old and has his health deteriorated, mainly his memory. In a couple of years he will probably be housed in assisted living. Due to his behavior in SMU and current condition, I do not feel he is an escape risk nor a security concern for SCDC.

MMFP361D
TSMMA

SOUTH CAROLINA DEPARTMENT OF CORRECTIONS
MESSAGE SYSTEM

01/05/16
C051568

MESSAGE ID: BLANDWA 1931 SUBJECT: EXPUNGEMENT OF RECORD
FROM USERID: BLANDWA CREATED: 01/05/16 DELETE DATE: 02/04/16
FROM USER.: BLANDING, WANDA D

REF: STEPHEN BECKHAM, SCDC# 236548 (MCCORMICK)

DATE OF ARREST: MARCH 15, 2006
CHARGE: ESCAPE/AIDING ESCAPES FROM PRISON
WARRANT#: 2006GS4001961

PLEASE NOTE, THE EXPUNGEMENT PROCESS WAS COMPLETED ON THE ABOVE CHARGE IN JANUARY 2014 BUT AT THAT TIME ONLY THE ARREST INFORMATION COULD BE REMOVED. PER COURT ORDER, THIS IS YOUR AUTHORIZATION TO REMOVE DOCUMENTS PERTAINING TO THE ABOVE LISTED ARREST FROM THE INMATE'S INSTITUTIONAL RECORD. PLEASE SECURE THE DOCUMENTS ALONG WITH YOUR COPY OF THIS MESSAGE IN AN INTERDEPARTMENT ENVELOPE AND FORWARD TO INMATE RECORDS OFFICE BY JAN. 15, 2015. PLACE A ROUTING SLIP ON TOP OF DOCUMENTS AND NOTE "DOCUMENTS TO BE EXPUNGED" SO RCVDOC PERSONNEL WILL KNOW WHERE TO FORWARD PAPERWORK. ***NO UPDATED NCIC IS NEEDED***

SPECIAL NOTE DO NOT REMOVE ANY SCDC FORMS 19-30 FROM THE RECORD BUT ONLY BLACKEN THE CHARGE. PLEASE FORWARD THE DISCIPLINARY REPORT. THE ESCAPE HAS BEEN DELETED AND DISCIPLINARY OVERTURNED.

THANKS,
WANDA BLANDING/INMATE RECORDS OFFICE

→ Should this include 19-30's that
state for him to remain in Att'l
due to class I Escape.

PAGE:

ROA046

EXHIBIT E

State of South Carolina
Department of Probation, Parole and Pardon Services

HENRY McMASTER
Clerk



JAKE GADSDEN, JR.
Director

293 Greystone Boulevard
Post Office Box 207
Columbia, South Carolina 29202
Telephone: (803) 734-9220
Fax: (803) 734-9440
www.dppps.sc.gov

October 10, 2025

Shannon Beckham Berley
2237 Fire Tower Rd
Prosperity, SC 29127

RE: Stephen Beckham SCD #: 00236548 SID #: 00200920
Sentence: Life
Proposed State/County of Residence: FAIRFIELD
Hearing Date: Wednesday, November 19, 2025

Please be advised that the above named inmate will be considered for parole on the above hearing date. Inmates will be located at a correctional institution and will communicate with the Parole Board via videoconferencing. In the event of a favorable decision, the offender may be released after meeting the conditions of release designated by the Parole Board.

You are welcome to participate in this hearing to personally make comments to the Parole Board relative to this matter. Please refer to the enclosed document "Victim Participation Options for Parole and Pardon Hearings" to participate in the hearing as there are specific deadlines which must be upheld. You are under no legal obligation to respond to this notification and may totally disregard this notice if you so desire. However, if you elect to participate in the hearing, you MUST notify the Office of Victim Services at 1-803-734-4770, toll free at 1-888-551-4118 or by email at victimservices@ppp.sc.gov upon receipt of this letter. Failure to contact our agency may result in the case being heard without your participation or being rescheduled without notice.

If you would like to be advised of the outcome of the hearing, please email victimservices@ppp.sc.gov or call 803-734-4770 or toll free 1-888-551-4118.

Sincerely,

A handwritten signature in cursive script, appearing to read "Nettie C. Jacobs".

Nettie C. Jacobs
Director of Victim Services

Enclosure

11/19/2025

ROA048

VICTIM PARTICIPATION OPTIONS FOR PAROLE & PARDON HEARINGS

If you wish to participate in a parole or pardon hearing, there are several options. Participation is voluntary and not required. To participate, please select one of the options below and notify the Office of Victim Services (OVS) by email at victimservices@ppp.sc.gov, phone at (803) 734-4770, or toll free at 1-888-551-4118 upon receipt of the hearing notification letter. Failure to notify may result in the case being heard without your participation.

APPEAR IN PERSON AT SCDPPPS CENTRAL OFFICE

Contact OVS to advise you wish to participate in person at least 2 weeks prior to the hearing date. OVS staff will contact you prior to the hearing date with the arrival time. Ensure you arrive at least 10 minutes prior to the arrival time at 293 Greystone Blvd., Columbia, SC 29210. If space permits, wait in the designated area until you are advised the hearing is ready to begin. A photo ID is required to enter the building.

APPEAR FROM A REMOTE SITE LOCATION NEAR YOU

Available remote sites include Anderson, Barnwell, Charleston, Chesterfield, Greenville, Marietta, Orangeburg, Spartanburg, Sumter, Walterboro, and York. Contact OVS to advise you wish to participate in person at least 2 weeks prior to the hearing date. OVS staff will contact you prior to the hearing date with the arrival time. Please arrive at remote locations at least 10 minutes prior to the arrival time. A Victim Advocate will be at the site to assist you. A photo ID is required. You will speak to the Board through a closed-circuit face-to-face video connection.

APPEAR VIRTUALLY

Contact OVS to advise you wish to participate virtually using a personal computer or smartphone at least 1 week prior to the hearing date. OVS staff will be available to assist in downloading the app. An Invitation will be emailed prior to the hearing. Please login at least 10 minutes prior to the provided time and wait in the virtual lobby.

TELEPHONE CALL TO THE BOARD

Contact OVS at least by 12 noon the day prior to the hearing to advise you wish to call to speak to the Board. OVS staff will provide the phone number and access code for you to call. OVS staff will contact you prior to the hearing date with the time for you to call and join. Call at least 10 minutes prior to the provided time and wait on hold.

SUBMIT A WRITTEN STATEMENT

Contact OVS to advise you wish to write a statement to be read to the Board during the hearing. Written statements must be submitted at least 48 hours prior to the hearing date by email to victimservices@ppp.sc.gov, by letter to SCDPPPS, Attn: Victim Services, PO Box 207, Columbia, SC, 29202, or by fax to 803-734-8822.

SUBMIT A DVD

Record a 5-minute or less video stating the inmate's name, SCDC number, hearing date, and the names of all the individuals in the video along with the statement they wish to make. Submit in writing the name and relationship of each person appearing in the video. Mail the DVD no later than 2 weeks prior to the hearing to SCDPPPS, Attn: Victim Services, PO Box 207, Columbia, SC 29202. The DVD will be destroyed after the hearing concludes.

REMEMBER

Parole and Pardon Hearings are public hearings and are audio recorded.

Be prepared for a waiting period, as the times provided are an estimate.

When participating in person:

No weapons or objects deemed potentially dangerous will be allowed in the building, with the exception of law enforcement and active military personnel. Please remove hats when entering the hearing room.

When participating virtually:

Do not attempt to participate in the hearing while driving.

CONFIDENTIALITY DISCLAIMER

SCDPPPS takes the position all information provided by victims/witnesses is confidential per S.C. Code 16-3-1555(B) and S.C. Code 24-21-290. However, any statement, appearance, or letter read into the record at a parole or pardon hearing will become part of the public record as Board hearings are public meetings.

SCDPPPS will respect the confidentiality of any information provided by victims/witnesses who request their statements not be included in the public record.

However, please be advised the courts have the authority to order the release of information within parole files; this means SCDPPPS cannot guarantee total confidentiality of victims/witnesses' statements.



State of South Carolina
Department of Probation, Parole and Pardon Services

HENRY McMASTER
Governor



JAKE GADSDEN, JR.
Director

293 GREYSTONE BOULEVARD
COLUMBIA, SOUTH CAROLINA 29210
Telephone: (803) 734-9220 / Facsimile: (803) 734-9440
ddd.sc.gov
MAILING ADDRESS: P.O. BOX 207
COLUMBIA, SOUTH CAROLINA 29202

December 30, 2025

Megan Powell, Deputy Director
Time Served
P. O. Box 615
Taylors, SC 29687

Re: Stephen Beckham, #236548
Request for a Reconsideration Hearing

Dear Ms. Powell:

I have been asked by the Director of Board Support Services to respond to your correspondence dated December 3, 2025. In it, you request the Board reconsider its decision denying parole following the parole hearing on November 19, 2025.

The standard for granting such a request is whether the inmate or the inmate's attorney provides information that the Board may have based its decision on materially inaccurate or incomplete information. You took the opportunity to review the file in advance of the hearing, and during the hearing you addressed the same matters you point out in your letter. Two of Mr. Beckham's three children addressed the Board during the hearing. A careful review of the entire record before the Board reveals nothing to indicate the Board may have relied upon materially erroneous or incomplete information of a substantial nature. Therefore, your request for reconsideration by the Board of its decision is hereby denied.

We will provide to Board Support Services personnel your correspondence so that they can investigate and, if appropriate, correct the matters you state are inaccurate prior to Mr. Beckham's next hearing. Please be advised that there is no rehearing/appeal process for the routine denial of parole; therefore, no further action will be taken on your request.

Respectfully,

A handwritten signature in cursive script that reads "Michael D. McMullen".

Michael D. McMullen
Legal Counsel



"Nation's First Probation Agency accredited by the Commission on Accreditation for Law Enforcement Agencies (CALEA)."



ROA050

70

State of South Carolina
Department of Probation, Parole and Pardon Services

HENRY McMASTER
Governor



JAKE GADSDEN, JR.
Director

293 GREYSTONE BOULEVARD
COLUMBIA, SOUTH CAROLINA 29210
Telephone: (803) 734-9220 / Facsimile: (803) 734-9440
ppp.sc.gov
MAILING ADDRESS: P.O. BOX 207
COLUMBIA, SOUTH CAROLINA 29202

February 23, 2026
BECKHAM, STEPHEN ANDREW (SCDC ID: 00236548)
Tyger River Correctional Center 100-200 Prison Rd Enoree, SC 29335-9308

This letter is in response to your request for a review of your parole file regarding the parole hearing conducted on 11/19/2025.

During your review, you disputed the facts of at least one current offense. You were given the opportunity to discuss your perceptions of the criminal offense(s) with the Board, during the hearing. You also added notes regarding the Official Statements. The statement received on behalf of the judge is the incorrect judge and has been updated to reflect a statement from the correct judge.

Please note, there is no rehearing/appeal process for the routine denial of parole.

Sincerely,

A handwritten signature in cursive script that reads "Katrina Canada".

Katrina Canada/ AW (Investigator III)
Asst. Deputy Director for Parole Board and Release Services
SC Department of Probation, Parole and Pardon Services



*"Nation's First Probation Agency accredited by the
Commission on Accreditation for Law Enforcement Agencies (CALEA)."*

ROA051





South Carolina Department of Probation, Parole and Pardon Services

Criteria for Parole Consideration

Inmate Name
BECKHAM, STEPHEN A.

SCDC#
00236548

SC Board of Probation, Parole and Pardon Services
P.O. Box 207
Columbia, SC 29202

Criteria for Parole Consideration

The South Carolina parole law creates no right to be released on parole. Parole in South Carolina is strictly a matter of privilege or grace. The South Carolina Board of Probation, Parole and Pardon Services has absolute discretion to grant or deny parole. As such, the publication of these parole criteria in no way creates an expectancy of release; nor does it bind the Parole Board in any way to a favorable parole decision or establish any presumptions of entitlement to parole.

In deciding whether or not to grant parole, the Parole Board considers, among other things, the inmate's record before incarceration as well as during incarceration. The record itself is prepared through investigations conducted for the Parole Board, and it becomes a part of the inmate's parole file. The files are maintained by the Department of Probation, Parole and Pardon Services and are, by the statute, privileged and confidential. The confidentiality of the parole file is far reaching; inmates themselves have no right to inspect the contents of their files. If the inmate thinks his/her file is somehow incomplete or contains some errors or other inaccuracy, he/she must notify the Board of the specific error or inaccuracy. The Board will investigate the inquiry and notify the inmate of the action taken.

Inmates do, however, enjoy certain rights in the parole process. The inmate has the right to appear at his parole hearing. If the inmate fails to appear, the Board may decide his/her case in absence. The inmate has the right to be represented by an attorney; however, he/she has no right to have an attorney appointed if he/she cannot afford one. At the hearing, the inmate has the right to present witnesses and evidence on his/her own behalf, but an inmate does not have a right to confront witnesses.

In deciding whether or not an inmate should be granted parole, the Board or Panel of the Board exercises its absolute discretion to the limits allowed by state and federal law. The discretion of the Board or panel aims at protecting the best interest of both society and the inmate being considered for parole. In its concern for the protection of society's and the inmate's best interests, the Board or Panel deliberates upon the "reasonable probability" that an inmate will not again violate the law, if parole is granted. When deliberating that an inmate will not again violate the law, the Board or Panel weighs the factors listed below. The Board or Panel, in its absolute discretion, also considers any other factors not listed below which it considers relevant in a particular case.

1. The risk the inmate poses to the community;
2. The nature and seriousness of the inmate's offense, the circumstances surrounding the offense, and the inmate's attitude toward it;
3. The inmate's prior criminal records and his/her adjustment under any previous programs or supervision;
4. The inmate's attitude toward his/her family, the victim, and authority in general;
5. The inmate's adjustment while in confinement, including his/her progress in counseling, therapy, and other similar programs designed to encourage the inmate to improve himself/herself;
6. The inmate's employment history, including his/her job training and skills and his/her stability in the work place;
7. The inmate's physical, mental and emotional health;
8. The inmate's understanding of the cause of his/her past criminal conduct;
9. The inmate's efforts to solve his/her problems such as seeking treatment for substance abuse, enrolling in academic and vocational education courses, and in general using whatever resources the Department of corrections has made available to inmates to help with their problems;
10. The adequacy of the inmate's overall parole plan. This includes inmates living arrangements, where he/she will live and who he will live with; the character of those with whom the inmate plans to associate in both his/her working hours and his/her off-work hours; the inmate's plans for gainful employment;
11. The willingness of the Community into which the inmate will be released to receive the inmate;
12. The willingness of the inmate's family to allow his/her to return to the family circle;
13. The attitudes of the sentencing judge, the solicitor, and local law enforcement officers respecting the inmate's parole;
14. The feelings of the victim's family, and any witnesses to the crime about the release of the inmate;
15. The actuarial risk and needs assessment outlined in section 24-21-10 (F)(1) of the S.C. Code of laws; which evaluates based on Criminal Involvement, Relationships/Lifestyle, Personality/Attitudes, Family, Social Exclusion and Mental Health.
16. Other factors considered relevant in a particular case by the Board.

Reservation of Discretionary Power of the Parole Board

These criteria in no way limit the absolute discretion of the Parole Board or Panel to make parole decisions on a case-by case basis and to grant or deny parole as it determines to be in the best interest of society and the inmate under review.

In some cases, the Board may decide that the inmate should be granted parole if the inmate completes one or more stated conditions. When this is the case, the Board may grant a parole that becomes effective when the inmate completes one or more stated conditions. Should the inmate fail to complete any one of these conditions or disobey any rule or regulation of the South Carolina Department of Corrections before satisfying the stated conditions to make his parole effective, the Board may rescind the inmate's parole and treat the case as though parole had been rejected. In other cases, the Board may feel it needs more time to form its decision. In such cases, the Board may simply take the parole consideration under advisement and reschedule it at a later date. Similarly, the Board may postpone a parole hearing in order to dispose of detainers or pending charges. If the Board rejects an inmate for parole, the inmate will be given written notice of rejection stating the reasons for rejection. Decisions of the Board have no precedential effect whatever and in no way limit the Board's absolute discretion at later parole hearings.

After rejection for parole, the procedure of scheduling of rehearing is as follows:

1. An individual serving time for a violent offense defined in §16-1-60 of the South Carolina Code of Laws 1976 will be reheard for parole two years following the date of parole rejections. Applicable legal exceptions may allow for a one year hearing.
2. An individual serving time for a nonviolent offense defined in §16-1-70 of the South Carolina Code of Laws 1976 will be reheard for parole one year following the date of parole rejections.

I certify that the above material has been explained to me, and I have received a copy.

Inmate's
Signature:

Date: 2/22/2024

Witness
Signature:

Date: 2/22/2024

South Carolina Department of Probation, Parole and Pardon Services
Acknowledgement of Parole File Review

SC Department of Probation, Parole and Pardon Services
P.O. Box 207 Columbia, SC 29202

Inmate Name BECKHAM, STEPHEN ANDREW	SCDC# 00236548
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The "Parole File" is defined as information compiled by the Agency for review by the SC Board of Pardons and Paroles in the course of their duty to consider cases for parole.

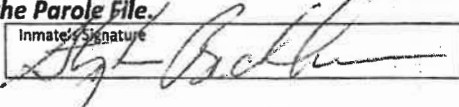
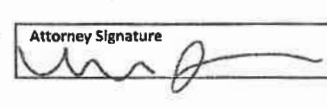
Information received from the inmate or third parties is not a part of the Agency's presentation and for the purpose of sharing parole files for review will not be reproduced.

All Victim information is redacted.

Regarding the hearing scheduled for (Hearing Date) **November 19, 2025**, the above-identified inmate and/or his attorney are permitted to review the parole file as prepared by the SC Department of Probation, Parole and Pardon Services.

The undersigned parties acknowledge the Agency's definition of parole file and understand that any alleged discrepancies identified within the parole file will be documented and may be addressed during the active hearing with the Board. The Agency is not obligated to alter facts or details which are unsubstantiated by official records. The Board maintains full discretion to grant or deny parole, based on their established criteria.

I certify that the above has been explained to me, and upon acknowledgement I have been granted access to review the Parole File.

Inmate's Signature 	Date 11-19-25	Attorney Signature 	Date 11-19-25
SCDPPPS Witness Signature 	Date 11-19-25	Other Witness Signature (Optional)	Date

☒ The inmate requests a review and corrections of the file.

☐ The inmate declined to review the parole file.

Inmate's Signature	Date	Attorney Signature	Date
SCDPPPS Witness Signature	Date	Other Witness Signature (Optional)	Date