

SUPREME COURT OF THE STATE OF DELAWARE

Parham v. State

Parham · No. No. 387, 2024 · Decided January 15, 2026

SUMMARY

The Delaware Supreme Court affirmed Walike C. Parham’s convictions and 56-year sentence arising from multiple attempted-murder, firearm, theft, conspiracy, and related offenses. The Court granted the State’s motion to affirm after reviewing counsel’s no-merit brief and motion to withdraw under Delaware Supreme Court Rule 26(c), concluding that the appeal presented no arguably appealable issues.

CASE DETAILS

COURT	Supreme Court of the State of Delaware
WRITING FOR THE COURT	Chief Justice Seitz; Justice Legrow; Justice Griffiths
JURISDICTION	Supreme Court of the State of Delaware
DECIDED	January 15, 2026
DOCKET	No. 387, 2024
DISPOSITION	affirmed
PROCEDURAL POSTURE	Direct appeal from a Superior Court judgment following a jury trial, convictions, sentencing, and appellate counsel's motion to withdraw under Delaware Supreme Court Rule 26(c).
STANDARD OF REVIEW	Under Delaware Supreme Court Rule 26(c), the Court must determine whether appellate counsel made a conscientious examination of the record and law for arguably appealable claims, and must independently review the record to determine whether the appeal is wholly devoid of at least arguably appealable issues such that it may be decided without adversary presentation.
PRECEDENTIAL VALUE	Published
PARTIES	Walike C. Parham v. State of Delaware

TOPICS

- appellate procedure
- standard of review
- criminal procedure
- right to counsel

PRACTICE AREAS

criminal appellate procedure

criminal procedure

QUESTIONS PRESENTED

1. Whether appellate counsel satisfied the requirements for withdrawal under Delaware Supreme Court Rule 26(c) by conducting a conscientious examination of the record and law.
2. Whether the appeal contained any arguably appealable issue requiring adversary presentation.
3. Whether the Superior Court's judgment should be affirmed.

HOLDINGS

1. Counsel satisfied Rule 26(c) because counsel made a conscientious examination of the record and the law and identified no arguably appealable issue.
2. The appeal was wholly without merit and devoid of any arguably appealable issues.

KEY QUOTATIONS

“First, the Court must be satisfied that defense counsel has made a conscientious examination of the record and the law for claims that could be arguably be raised on appeal.” (at 2)

“Second, the Court must conduct its own review of the record and determine whether the appeal is so totally devoid of at least arguably appealable issues that it can be decided without an adversary presentation.” (at 2)

“The Court has reviewed the record carefully and has concluded that Parham’s appeal is wholly without merit and devoid of any arguably appealable issues.” (at 2)

FACTUAL BACKGROUND

In May 2022, Parham was charged with multiple offenses, including three counts of attempted first-degree murder, motor-vehicle theft, and firearm offenses. After an eight-day trial, a jury convicted him of numerous offenses, and the Superior Court separately found him guilty of two counts of possession of a firearm by a person prohibited. The Superior Court imposed an aggregate sentence of 56 years of incarceration followed by probation.

PROCEDURAL HISTORY

Parham was charged in a multiple-count indictment and, after an eight-day jury trial, was convicted of attempted first-degree murder, firearm, theft, conspiracy, criminal mischief, and resisting-arrest offenses. The Superior Court separately found him guilty of two counts of possession of a firearm by a person prohibited and sentenced him to a total of 56 years of incarceration followed by probation. On direct appeal, appointed counsel filed a no-merit brief and moved to withdraw under Rule 26(c); Parham raised no additional issues, and the State moved to affirm.

DISPOSITION

affirmed

CASES CITED

- Penson v. Ohio, 488 U.S. 75, 83 (1988)
- McCoy v. Court of Appeals of Wis., 486 U.S. 429, 442 (1988)
- Anders v. California, 386 U.S. 738, 744 (1967)

OPINION

PER CURIAM.

IN THE SUPREME COURT OF THE STATE OF DELAWARE WALIKE C. PARHAM, § § No. 387, 2024 Defendant Below, § Appellant, § Court Below–Superior Court § of the State of Delaware v. § § Cr. ID Nos. 2205008776A&B (N) STATE OF DELAWARE, § § Appellee. § § Submitted: October 23, 2025 Decided: January 15, 2026 Before SEITZ, Chief Justice; LEGROW and GRIFFITHS, Justices. ORDER After consideration of the no-merit brief and motion to withdraw filed by the appellant’s counsel under Supreme Court Rule 26(c), the appellee’s response, and the Superior Court record, it appears to the Court that: (1) In May 2022, Walike Parham was charged in a multiple-count indictment with, among other things, three counts of attempted first-degree murder, two counts of theft of a motor vehicle, and multiple firearm offenses.

Following an eight-day trial, a Superior Court jury found Parham guilty of three counts of attempted first-degree murder, two counts of possession of a firearm during the commission of a felony, two counts of theft of a motor vehicle, two counts of first- degree conspiracy, two counts of second-degree conspiracy, two counts of criminal mischief, and one count of resisting arrest.

Thereafter, the Superior Court found Parham guilty of two counts of possession of a firearm by a person prohibited. Following a presentence investigation, the Superior Court sentenced Parham to a total of 56 years of incarceration followed by probation. This is Parham’s direct appeal.

(2) Parham’s counsel on appeal has filed a brief and a motion to withdraw under Rule 26(c). Counsel asserts that, after a complete and careful examination of the record, he can identify no arguably appealable issues. Counsel informed Parham of the provisions of Rule 26(c) and provided him with a copy of the motion to withdraw and a draft of the accompanying brief.

Counsel also informed Parham of his right to supplement his attorney’s presentation. Parham has not raised any issues for the Court’s consideration. The State has responded to the Rule 26(c) brief and has moved to affirm the Superior Court’s judgment.

(3) The standard and scope of review applicable to the consideration of a motion to withdraw and an accompanying brief under Rule 26(c) is twofold. First, the Court must be satisfied that defense

counsel has made a conscientious examination of the record and the law for claims that could be arguably be raised on appeal.¹ Second, the Court must conduct its own review of the record and determine 1 *Penson v. Ohio*, 488 U.S. 75, 83 (1988); *McCoy v. Court of Appeals of Wis.*, 486 U.S. 429, 442 (1988); *Anders v. California*, 386 U.S. 738, 744 (1967).

2 whether the appeal is so totally devoid of at least arguably appealable issues that it can be decided without an adversary presentation.² (4) The Court has reviewed the record carefully and has concluded that Parham's appeal is wholly without merit and devoid of any arguably appealable issues.

We also are satisfied that Parham's counsel has made a conscientious effort to examine the record and the law and has properly determined that Parham could not raise a meritorious claim in this appeal. NOW, THEREFORE, IT IS ORDERED that the judgment of the Superior Court is AFFIRMED. Counsel's motion to withdraw is moot. BY THE COURT: /s/ N. Christopher Griffiths Justice 2 *Penson*, 488 U.S. at 81-82.