

No: _____

**In the
Supreme Court of the United States**

HANNIBAL MOORE
Petitioner,

v.

UNITED STATES OF AMERICA,
Respondent.

ON PETITION FOR A WRIT OF CERTIORARI
TO THE UNITED STATES COURT OF APPEALS
FOR THE ELEVENTH CIRCUIT

PETITION FOR A WRIT OF CERTIORARI

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QUESTION PRESENTED

Federal courts have recognized the defense of justification as a common law affirmative defense to a violation of. A defendant bears both the burden of production and the burden of persuasion as to a justification defense. The justification defense is very narrowly construed and it is only in the rare case that it is applicable. There are four elements to the justification defense. The first three elements require the defendant to show that they faced an unlawful imminent and immediate threat of death or serious bodily injury, that at that specific time they had no reasonable legal alternative to violating the law, and there was a direct causal relationship between the immediate threat and the criminal conduct. The fourth element of the justification defense is a disqualifying provision, which disallows the defense where a defendant negligently or recklessly places themselves in a situation where they would be forced to engage in criminal conduct. As to the first three elements, Federal courts have consistently focused on a defendant's actions at the moment of the imminent threat; a temporal focus. The defendant may possess the firearm only so long as to meet the immediate and imminent threat; nothing more.

The question presented is whether the courts should also take a narrow view in considering the disqualifying element of the justification defense, and only disqualify the defendant where their actions are the actual proximate cause of the immediate and imminent threat.

RELATED PROCEEDINGS

The following proceedings are directly related to this petition:

United States v. Hannibal Moore, No. 21-12291, United States Court of Appeals for the Eleventh Circuit, judgment entered August 11, 2023 (74 F. 4th 1355), rehearing denied September 20, 2023.

United States v. Hannibal Moore, No. 1:19-cr-00028-JB-N-1, United States District Court for the Southern District of Alabama, judgment entered June 29, 2021. .

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PETITION FOR A WRIT OF CERTIORARI

Petitioner Hannibal Moore respectfully asks this Court for a writ of certiorari to review the judgment of the United States Court of Appeals for the Eleventh Circuit in this case.

OPINIONS BELOW

The opinion of the court of appeals (App. A) is reported at 74 F. 4th 1355 (11th Cir. 2023). The Eleventh Circuit's order denying panel rehearing (App. B) is not published.

JURISDICTION

The Eleventh Circuit court of appeals entered its judgment on August 11, 2023 (App. A) and denied panel rehearing on September 20, 2023 (App. B). This petition is being filed within 90 days of the denial of the Petitioner's application for rehearing. This Court has jurisdiction pursuant to 28 U.S.C. § 1254(1).

CONSTITUTIONAL PROVISIONS AND RULES INVOLVED

The Fifth Amendment to the United States Constitution provides
in relevant part:

No person shall be held to answer for a capital, or otherwise infamous crime, unless on a presentment or indictment of a Grand Jury, except in cases arising in the land or naval forces, or in the Militia, when in actual service in time of War or public danger; nor shall any person be subject for the same offence to be twice put in jeopardy of life or limb; nor shall be compelled in any criminal case to be a witness against himself, nor be deprived of life, liberty, or property, without due process of law; ...

United States Code Title 18, § 922(g) provides in relevant part:

(g) It shall be unlawful for any person—

- (1) who has been convicted in any court of, a crime punishable by imprisonment for a term exceeding one year;

...

to ship or transport in interstate or foreign commerce, or possess in or affecting commerce, any firearm or ammunition; or to receive any firearm or ammunition which has been shipped or transported in interstate or foreign commerce.

INTRODUCTION

This Court, as well as the Federal Circuit Courts have recognized the common law defense of justification as an affirmative defense to a violation of 18 U.S.C. § 922(g); felon in possession of a firearm. See *Dixon v. United States*, 548 U.S. 1, 3, 126 S. Ct. 2437, 2440 (2006); *United States v. Deleveaux*, 205 F.3d 1292, 1297 (11th Cir. 2000); *United States v. Gomez*, 92 F.3d 770, 774-75 (9th Cir. 1996); *United States v. Paoello*, 951 F.2d 537, 541 (3d Cir.1991); *United States v. Singleton*, 902 F.2d 471, 472 (6th Cir.1990).

The affirmative defense of justification is generally comprised of four elements.

(1) that the defendant was under unlawful and present, imminent, and impending threat of death or serious bodily injury; (2) that the defendant did not negligently or recklessly place himself in a situation where he would be forced to engage in criminal conduct; (3) that the defendant had no reasonable legal alternative to violating the law; and (4) that there was a direct causal relationship between the criminal action and the avoidance of the threatened harm.

United States v. Deleveaux, 205 F.3d at 1297.

Three of the elements require an affirmative showing by a defendant asserting the defense. The fourth element is a disqualifier, which denies a defendant the affirmative defense where the defendant's own reckless

or negligent conduct places themselves in the circumstances requiring their possession of the firearm.

A number of federal circuits below have examined the nature of the conduct required in order for a defendant to be disqualified due to their own actions being the cause of the circumstances necessitating their possession of the firearm. These decisions have focused on whether the defendant's conduct was the "proximate cause" of the circumstances, or whether some other "subsequent intervening cause" was responsible for the circumstances, as those terms are commonly understood by the federal circuit courts. These decisions have also limited their consideration of the defendant's actions to those reasonably contemporaneous with the offense itself.

The Eleventh Circuit decision in this case strays from the principles in two ways: first, the decision strays from the application of principles of proximate cause and subsequent intervening cause by resting the affirmance of the Petitioner's conviction on his actions being one of a number of potential causes in fact, but not the proximate cause of the immediate threat. Second, the decision below used a temporally expansive view which brings into consideration actions of the Petitioner which are too attenuated to be considered the proximate cause of the

situation necessitating his momentary possession of the firearm in this case.

The opinion below conflicts with decisions of other circuits regarding the appropriate analysis of the disqualifying element of the justification defense. The decision below has departed from the accepted and usual interpretation and application of the common law defense of justification to the extent that the exercise of this Court's supervisory power is required. This guidance of this Court is needed as to the proper contours and application of the justification defense in relation to § 922(g) prosecutions. More specifically, this Court's guidance is required to clearly define the appropriate causation considerations in terms of a defendant's own conduct in relation to the justification defense.

STATEMENT OF THE CASE

A. Factual and Procedural Background

In 2017, Petitioner Hannibal Moore was in a relationship with Samaria Howle. On the last weekend of October in 2017, Moore and Samaria Howle traveled from Mobile, Alabama to Birmingham, Alabama to attend a football weekend. While in Birmingham, the couple had an altercation that resulted in Moore being arrested. Samaria Howle returned to Mobile.

Moore and Samaria Howle had been living together at Samaria's house. But she decided that she didn't want him to return there and asked her brother-in-law, Jerry Coxwell, to change the locks on the doors of her house. Coxwell did this by swapping the locks on his house for those on her house. Coxwell retained a key to the locks, but did not inform Samaria of this fact.

Moore was released from jail, and the next evening, Samaria let Moore use her debit card to purchase a bus ticket from Birmingham back to Mobile. When Moore arrived in Mobile, Samaria picked him up at the bus station and the pair went to her home. Samaria agreed that Moore could stay at her house that night.

Around midnight, Samaria's ex-husband Andrew Howle came to her house. He rang the doorbell, and Samaria answered the door. According to Howle he had heard about the altercation in Birmingham, and he wanted to check on Samaria. Samaria told Howle that she was fine and instructed him to leave. Before Howle left, however, he and Moore had words, including the exchange of racially derogatory terms. Moore is an African-American, and Samaria and Howle are white. Samaria and Howle had a son together. According to Samaria and Howle's own admission, Howle did not agree with Samaria's relationship with Moore and did not like Moore being around his son. Following Samaria's instruction, Howle left her house.

After Andrew Howle left Samaria's house, he went and picked up Jerry Coxwell. Coxwell and Howle returned to Samaria's house around 2:00 a.m. in the morning, with the stated intentions of removing Hannibal Moore from the home, forcibly if necessary. When they arrived at Samaria's house, they banged on the door, and rang the doorbell repeatedly. Jerry Coxwell told Andrew Howle that he was going to go to the back door and go into the house.

Hearing the ringing and knocking outside, Hannibal Moore got out of bed and went to a different bedroom which faced the front of the house. He peeked out the window and according to Moore, saw three

men. He did not recognize any of the three, and believed that he saw one of the men holding a shotgun. Seeing this, Hannibal returned to the bedroom and encouraged Samaria to retrieve her pistol.

Encouraged by Moore, Samaria retrieved her gun, and the pair walked slowly up the hallway toward the living room of the house; Samaria going first, and Moore following closely behind. The house was dark inside. In the meantime, Coxwell had jumped the fence to the back yard and was preparing to enter the house. As Samaria and Moore reached the living room near the front door, Coxwell used his key to open the back door of the house, located in the kitchen area, and entered the dark house unannounced.

When Coxwell entered the back door in the kitchen area, he walked toward the living room where Samaria and Hannibal Moore were standing. Hannibal Moore grabbed the pistol from Samaria Howle and fired one shot, striking Coxwell in the groin. Immediately after firing the shot, Hannibal Moore took the pistol and placed it on the couch. After setting the gun on the couch, Hannibal Moore dialed 911.

B. Procedural Background

The Petitioner was indicted on one count of violating 18 U.S.C. § 922(g). At his trial, Moore asserted a justification defense. The District Court found that Moore had met his burden of production as to the defense and the jury was instructed on the affirmative defense of justification. The jury returned a guilty verdict against Moore. Moore was sentenced to a term of imprisonment of 80 months. (App. C).

Moore appealed his conviction to the Eleventh Circuit. After briefing and oral argument, the Eleventh Circuit issued a published opinion in which it affirmed Moore's conviction and sentence. (App. A).

REASONS FOR GRANTING THE WRIT

A criminal defendant has a right to a “meaningful opportunity to present a complete defense.” *California v. Trombetta*, 467 U.S. 479, 485 (1984); *Crane v. Kentucky*, 476 U.S. 683, 690 (1986). This right necessarily includes the right to present an affirmative defense where applicable to the charged crime. Additionally, due process requires that a criminal prosecutions comport with prevailing notions of fundamental fairness. *California v. Trombetta*, 467 U.S. at 485.

Consistent with the right to present a complete defense, is the right to assert an affirmative defense to a criminal charge if the facts of the case support such a defense and to have the affirmative defense considered and judged in a manner that comports with prevailing notions of fundamental fairness.

This Court, as well as the Federal Circuit Courts have recognized the common law defense of justification as an affirmative defense to a violation of 18 U.S.C. § 922(g); felon in possession of a firearm. See *Dixon v. United States*, 548 U.S. 1, 3, 126 S. Ct. 2437, 2440 (2006); *United States v. Deleveaux*, 205 F.3d 1292, 1297 (11th Cir. 2000); *United States v. Gomez*, 92 F.3d 770, 774-75 (9th Cir. 1996); *United States v.*

Paolello, 951 F.2d 537, 541 (3d Cir.1991); *United States v. Singleton*, 902 F.2d 471, 472 (6th Cir.1990).

The affirmative defense of justification is generally comprised of four elements.

(1) that the defendant was under unlawful and present, imminent, and impending threat of death or serious bodily injury; (2) that the defendant did not negligently or recklessly place himself in a situation where he would be forced to engage in criminal conduct; (3) that the defendant had no reasonable legal alternative to violating the law; and (4) that there was a direct causal relationship between the criminal action and the avoidance of the threatened harm.

United States v. Deleveaux, 205 F.3d at 1297; See also, *Paolello*, 951 F.2d at 540; *Singleton*, 902 F.2d at 472.

Under these elements, the criminal defendant bears the burden of production in the first instance, and must produce sufficient evidence of the elements to satisfy the trial court that they should be allowed to present the affirmative defense to the jury. If successful, the defendant must then satisfy the burden of persuasion as to the defense.

The fourth element is a disqualifier. A criminal defendant is barred from asserting a justification defense where the defendant's own reckless or negligent actions create the situation or circumstances in which they are forced to engage in criminal conduct by possessing the

firearm. While not explicitly stating it, the disqualifying element concerns itself with causation; meaning, the element requires an inquiry into whether the actions of the defendant were the proximate cause of the situation in which the defendant was forced to engage in criminal conduct. This has been the treatment given to the element in numerous circuits.

For instance, in *United States v. Singleton*, the defendant claimed that kidnapped by another person he encountered while test driving an automobile from a car dealership. Singleton claimed that he was at a service station when the person demanded money. Singleton left the service station and returned the car to the dealership whereupon the person reappeared and kidnapped Singleton. According to Singleton, he obtained a firearm while in the process of escaping from his kidnapper. He then fled to the residence of a friend's girlfriend and left the firearm in his car parked outside the residence. Authorities found the gun when they came searching for Singleton after he failed to timely return to the halfway house at which he resided. *United States v. Singleton*, 902 F. 2d 471, 471 (6th Cir. 1990). Concerning the government's argument that Singleton acted recklessly or negligently by returning to the car dealership as opposed to going directly to the halfway house, the 6th Circuit concluded that

Singleton's actions did "not lead to an inescapable conclusion that Singleton negligently or recklessly placed himself in a position where he would likely take possession of a firearm." *Singleton*, 902 at 472. Ultimately, Singleton was not allowed to assert a justification defense, not because his own actions created the situation, but because he simply held on to the firearm after the danger had passed.

On *United States v. Newcomb*, Newcomb was at his girlfriend's house when she told him that her son had just grabbed a gun and ran outside threatening to kill someone. Newcomb, his girlfriend Betty, and Betty's brother went in search of Betty's son. *United States v. Newcomb*, 6 F. 3d 1129, 1130 (6th Cir. 1993). The three caught up with Betty's son in a nearby alley. After a brief argument, the son gave up the gun and handed it to Newcomb. Newcomb unloaded the gun, putting the shells in his pocket. Newcomb either returned the gun to the son, or the son grabbed the gun back from Newcomb, but in either event, the son discarded the gun down the alley. Some time afterward, a police patrol arrived and arrested Newcomb. In analyzing the disqualifying element of the justification defense, the 6th Circuit held that "Newcomb was behaving in a perfectly reasonable and legal manner when the emergency situation presented itself" and "[t]here was no reason for him to think that, in watching television at his

girlfriend's house, he was inviting a confrontation with her armed son."

According to the court "[i]t simply cannot be said that Newcomb was behaving recklessly or negligently by being at Betty Benson's house."

United States v. Newcomb, 6 F. 3d at 1135-36.

In *United States v. Paoello*, Paoello went to a local tavern with his stepson. While there, Paoello and another man got into an argument. When Paoello left the bar, the man followed him outside. Paoello's stepson, Williams, followed the pair outside where he saw Paoello and the man arguing. A crowd gathered, and the man hit Williams in the head, then pulled out a gun and shot into the air. Paoello grabbed the man's hand, and the gun fell to the ground. Paoello and the man grappled for the gun, but Paoello ultimately grabbed the gun and ran. He was stopped a short distance away by police. In analyzing the justification defense and Paoello's behavior the 3rd Circuit held:

We also think that, at least in a criminal case, a justification defense is dependent upon the defendant not having recklessly placed himself in a situation in which he would be forced to engage in criminal conduct. Of course, there is no indication that Paoello was reckless. While the government suggests that he was at fault because he went to a bar "known as a place where 'bad' people hang out in the early morning hours of the day" and that he left the bar even though he had reason to believe there would be trouble if he did that, it seems to us that no reasonable trier of the fact could find that such lawful conduct was "reckless" so as to deprive Paoello of a justification defense

which he might otherwise have. Al's Tavern, after all, was a public place of business and, at least as far as the record shows, Paolello went there for legitimate purposes and had no reason to believe that he would be in danger there. This case differs qualitatively from one in which, for example, a defendant enters a premises to commit a crime and then is confronted with an armed occupant

United States v. Paolello, 951 F.2d 537, 541 (3d Cir. 1991).

In *United States v. Agard*, the defendant worked at a pizza shop.

One evening three men came into the shop and ordered food.

According to Agard, the men began discussing guns, and he became afraid that they intended to rob the shop. Agard initiated an altercation with the three men when he jumped over the counter to confront them and put them out of the shop. One man made a move which Agard took as threatening and suggestive that the man had a gun. In response, Agard grabbed an assault rifle that was nearby and fired several shots into the air, dispersing all but one of the men.

Agard held the one man at gunpoint until police arrived. Agard was eventually charged with being a felon in possession of a firearm.

United States v. Agard, 605 F. 2d 665, 666 (2nd Cir. 1979). The 2nd Circuit affirmed the trial court's denial of a justification defense based on a finding that Agard recklessly or negligently placed himself in a situation in which it was probable that he would be subject to duress. According to the court, he did this by initiating the altercation in which

he attempted to evict the three men from the pizza shop under circumstances where he was alone in the shop and he could well have expected harm. *Agard*, 605 F. 2d at 668.

In *United States v. Blankenship*, four people came to Blankenship's trailer demanding he return a sum of money and threatening harm to Blankenship. Blankenship knew one of the people, Kellick, to have a reputation for violence, and knew that Kellick was intoxicated at the time. Nevertheless, Blankenship went outside to talk to the people. The altercation escalated, and Blankenship slipped back into his trailer, dressed, went out of the back door, and walked to his father's nearby trailer and retrieved a shotgun. When he returned to his trailer, Blankenship and Kellick got into a scuffle during which Kellick was shot and killed. *United States v. Blankenship*, 67 F. 3d 673, 677-78 (8th Cir. 1995). Blankenship's justification defense was rejected because he recklessly or negligently placed himself in the dangerous situation by going outside to confront Kellick and the others, then by obtaining a firearm and returning to the situation after having disengaged. *Id.*

The defendant in *United States v. Wheeler* was charged with unlawful possession of a firearm. On the night of the incident, Wheeler had received information that fellow members of his

motorcycle gang were going to be ambushed at a local lounge. Acting on this information, Wheeler obtained a gun and went to the lounge with the intention of protecting his friends. *United States v. Wheeler*, 800 F. 2d 100, 106 (7th Cir. 1986). Wheeler was denied a justification defense because his own reckless or negligent actions created the situation in which he was in possession of a firearm. *Wheeler*, 800 F. 2d at 107. The 7th Circuit held: "In other words, a felon may not arm himself or herself and go looking for trouble." *Id.*

The justification defense is a narrowly construed defense, and a defendant is rarely allowed to proceed to a jury with the defense. The allowance to a defendant of justification to possess a firearm is small. A defendant is allowed to possess the firearm only so long as to meet the immediate and imminent threat of death or serious bodily injury. The defense is ineffective if the defendant possesses the firearm a moment longer than necessary. The defense is ineffective if the defendant obtains the firearm in advance of the threat, even if only by moments. With the first three elements, the relevant time frame is narrow. An examination of the fourth element, the disqualifying element, should be no different.

As to the disqualifying element, each of these foregoing decisions focused on the question of whether the defendant's conduct was the

proximate cause of the circumstances that led to the defendant possessing the firearm. The cases recognize that a defendant's actions, which may be part of the cause in fact of the situation, may not be the proximate cause, or driving force that necessitated the criminal conduct.

As noted by this Court in *Paroline v. United States*, "to say one event proximately caused another is a way of making two separate but related assertions." First, the first event is the actual cause or "cause in fact" of the later event, meaning it caused the later event as a matter of common inquiry. *Paroline v. United States*, 572 U.S. 434, 444 (2014). But, "[e]very event has many causes" and "only some of them are proximate as the law uses that term." *Id.* "So, to say that one event was a proximate cause of another means that it was not just any cause, but one with a sufficient connection to the result." *Id.* This sufficient connection refers to "the basic requirement that ... there must be some direct relation between the injury asserted and the injurious conduct alleged." *Id.*, quoting *CSX Transp., Inc. v. McBride*, 564 U.S. 685, 707 (2011) (Roberts, C. J., dissenting) (quoting in turn *Holmes v. Securities Investor Protection Corporation*, 503 U.S. 258, 268 (1992)). The requirement of proximate cause in criminal law serves to prevent liability under circumstances where the causal link between some

conduct and a result is "so attenuated that the consequences is more aptly described as mere fortuity." *Exxon Co., U. S. A. v. Sofec, Inc.*, 517 U.S. 830, 838-839 (1996).

In this case, the Eleventh Circuit opinion improperly considers the mere fortuitous relationship between Moore's actions and the necessity of Moore possessing the firearm as sufficient causation for a jury to reasonably conclude that he was disqualified from a justification defense. The opinion appears to ignore the actions of Howle and Coxwell in going to Samaria Howle's home at 2:00 a.m. in the morning, and particularly the actions of Coxwell in entering the dark kitchen of the house unannounced in the middle of the night. When placed in its proper narrow focus, the inquiry as to the proximate cause of Moore possessing the firearm is clear. But for Coxwell entering the house that night unannounced and at 2:00 a.m., Moore would not have possessed the firearm. Moore might well have done all that the actions noted in the Eleventh Circuit's opinion, and never had the necessity of possessing the firearm.

By broadening the inquiry, the Eleventh Circuit dilutes the justification defense by allowing causes in fact, which do not amount to a true proximate cause, to disqualify a defendant from the defense. The broad focus in the Eleventh Circuit opinion is not consistent with

the narrow contours applied by other circuits in analyzing the justification defense.

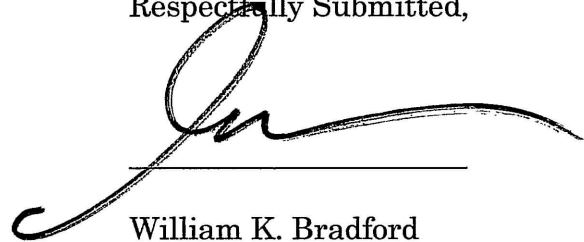
Further, the Eleventh Circuit opinion exceeds reasonable temporal bounds; considering actions remote in time to the incident in which Moore momentarily possessed the firearm. The temporal remoteness of actions increases the likelihood that the actions are too attenuated to be the proximate cause of the immediate and immanent threat. This is particularly true where others actions much closer in time, or even contemporaneous with the situation constitute intervening causes.

The broad standard of causation for the disqualifying element of the justification defense as used by the Eleventh Circuit in this case threatens to swallow the affirmative defense of justification whole. Under the Eleventh Circuit's rule, nearly any action of a defendant can be projected forward to affect the circumstance in which the defendant possesses the firearm by necessity in some small way. This broad interpretation and application of causation is inconsistent with the decisions from other circuits set out above. This Court's guidance is required to better define the contours of the justification defense as to the proper analysis of causation in the disqualifying element of the

CONCLUSION

The petition for writ of certiorari should be granted.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read 'W. Bradford', is written over a horizontal line.

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