

No. \_\_\_\_\_

**IN THE SUPREME COURT OF THE UNITED  
STATES**

LEWIS CURTIS WOODARD,

Petitioner,

v.

STATE OF ALABAMA; KEITH BLACKWOOD, in  
his official capacity as District Attorney for the  
Thirteenth Judicial Circuit; and STATE FARM  
MUTUAL AUTOMOBILE INSURANCE COMPANY,

Respondents.

On Petition for a Writ of Certiorari to the Supreme  
Court of Alabama

**PETITION FOR A WRIT OF CERTIORARI**

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## **QUESTIONS PRESENTED**

The Constitution of the United States does not merely authorize the exercise of governmental power; it restrains that power. The Fourth Amendment protects the people against unreasonable searches and seizures, and the Fourteenth Amendment prohibits a State from depriving any person of property without due process of law. Those constitutional guarantees do not expire once the government acquires possession of private property. Rather, they continue to govern every exercise of governmental authority from the inception of an investigation through the permanent deprivation of private property by civil forfeiture.

This case presents recurring and exceptionally important questions concerning the continuing application of the Fourth and Fourteenth Amendments to state civil forfeiture proceedings.

The questions presented are:

Whether the Fourth Amendment's prohibition against unreasonable searches and seizures continues to restrain governmental authority throughout the investigation, search, seizure, continued retention, examination, and permanent forfeiture of private property in a state civil forfeiture proceeding.

Whether the Due Process Clause of the Fourteenth Amendment permits a State to permanently deprive a citizen of private property without first providing meaningful judicial consideration of preserved federal constitutional objections concerning the legality of the governmental conduct upon which the forfeiture is based.

Whether a State may constitutionally acquire permanent title to private property where the forfeiture judgment rests upon governmental conduct

alleged to violate the Fourth and Fourteenth Amendments to the Constitution of the United States.

Whether this Court should grant certiorari to reaffirm that constitutional protections remain fully operative throughout every stage of a civil forfeiture proceeding and that governmental authority remains continuously subject to the limitations imposed by the Fourth and Fourteenth Amendments.

### **LIST OF PARTIES**

Pursuant to Rule 14.1(b) of the Rules of the Supreme Court of the United States, the parties to the proceedings are:

#### **Petitioner**

Lewis Curtis Woodard

#### **Respondents**

State of Alabama

Keith Blackwood, in his official capacity as  
District Attorney for the Thirteenth Judicial Circuit

State Farm Mutual Automobile Insurance  
Company

### **RELATED PROCEEDINGS**

The proceedings directly related to this Petition are:

#### **Supreme Court of Alabama**

Lewis Curtis Woodard v. State of Alabama, et al.

Case No. SC-2026-0076

Order denying relief entered May 26, 2026.

Application for Rehearing denied.

#### **Circuit Court of Mobile County, Alabama**

State of Alabama v. Lewis Curtis Woodard

Case No. CV-2023-902597

Final Judgment ordering forfeiture of Petitioner's property.

Petitioner is aware of no other state or federal proceedings directly related to this Petition.

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### **Constitutional Provisions**

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13

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Additional Alabama authorities are cited within  
the body of the Petition.

## **OPINIONS BELOW**

The final judgment of the Circuit Court of Mobile County, Alabama, ordering the forfeiture of Petitioner's property is reproduced in the Appendix.

The order of the Supreme Court of Alabama denying relief and leaving the forfeiture judgment undisturbed is reproduced in the Appendix.

The Supreme Court of Alabama did not issue a written opinion addressing Petitioner's federal constitutional claims.

## **JURISDICTION**

The judgment of the Supreme Court of Alabama constitutes the final judgment of the highest court of a State in which a decision could be had.

This Court has jurisdiction under 28 U.S.C. § 1257(a) because this Petition seeks review of a final judgment entered by the highest court of the State of Alabama, and the judgment presents substantial questions arising under the Constitution of the United States.

The Supreme Court of Alabama entered its final order on May 26, 2026. Petitioner's timely Application for Rehearing was denied. This Petition is filed within the time prescribed by Rule 13 of the Rules of the Supreme Court of the United States.

Throughout the proceedings below, Petitioner asserted rights secured by the Fourth and Fourteenth Amendments to the Constitution of the United States. Those federal constitutional questions were preserved and are properly presented for this Court's review.

## **CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED**

United States Constitution Amendment IV

The right of the people to be secure in their persons, houses, papers, and effects, against unreasonable searches and seizures, shall not be violated, and no Warrants shall issue, but upon probable cause, supported by Oath or affirmation, and particularly describing the place to be searched, and the persons or things to be seized.

### **Amendment XIV, Section 1**

No State shall make or enforce any law which shall abridge the privileges or immunities of citizens of the United States; nor shall any State deprive any person of life, liberty, or property, without due process of law.

### **Federal Statute**

28 U.S.C. § 1257(a)

Final judgments or decrees rendered by the highest court of a State in which a decision could be had may be reviewed by the Supreme Court of the United States by writ of certiorari where the validity of the judgment depends upon the resolution of a question arising under the Constitution, laws, or treaties of the United States.

Alabama Statutes Ala. Code § 20-2-93

Authorizes civil forfeiture proceedings involving property alleged to be connected with violations of Alabama law.

Ala. Code § 32-8-86

Governs vehicle identification numbers, certificates of title, and matters relevant to the proceedings below.

## **INTRODUCTION**

The Constitution of the United States was adopted to restrain governmental power and to secure the liberty and property of the people. The Fourth Amendment protects citizens against

unreasonable searches and seizures, while the Fourteenth Amendment prohibits any State from depriving a person of property without due process of law. These constitutional guarantees are not temporary protections that expire once the government has taken possession of private property. They remain continuing limitations upon governmental authority from the inception of an investigation through the final judgment permanently transferring ownership of private property to the State.

This Petition presents a recurring and exceptionally important question concerning the continuing application of those constitutional restraints within the context of civil forfeiture. Specifically, it asks whether a State may permanently deprive a citizen of private property where substantial federal constitutional objections concerning the investigation, search, seizure, continued retention, examination, and forfeiture of that property remain unresolved.

Petitioner, Lewis Curtis Woodard, purchased the property at issue as an innocent purchaser for value, relying upon a facially valid Alabama certificate of title. Throughout the proceedings below, Petitioner consistently maintained that he possessed no knowledge of any unlawful conduct affecting the property and that he lawfully acquired ownership under Alabama law. Nevertheless, the State instituted civil forfeiture proceedings that ultimately resulted in the permanent deprivation of Petitioner's property.

During those proceedings, Petitioner asserted that governmental officials exceeded the constitutional limitations imposed by the Fourth Amendment during the investigation and examination of the property. He further challenged the admissibility and reliability of evidence offered in

support of forfeiture, including testimony lacking personal knowledge and evidence derived from governmental conduct alleged to violate constitutional protections. Petitioner also maintained that the permanent deprivation of his property without meaningful adjudication of these preserved constitutional objections violated the Due Process Clause of the Fourteenth Amendment.

The courts below nevertheless authorized the State to obtain permanent ownership of Petitioner's property. As a consequence, the federal constitutional questions presented by Petitioner remain unresolved while the judgment permanently divesting him of ownership remains in force.

The importance of this case extends far beyond the forfeiture of a single automobile. Civil forfeiture statutes authorize governmental entities throughout the Nation to seize, retain, and permanently acquire private property. If constitutional protections diminish after governmental possession has been obtained, then the Fourth and Fourteenth Amendments cease to function as continuing restraints upon governmental authority precisely when those restraints are most needed.

This Court has repeatedly recognized that civil forfeiture proceedings remain subject to constitutional limitations. The protections guaranteed by the Fourth Amendment and the Due Process Clause do not depend upon whether the government labels its action civil or criminal. Constitutional rights regulate governmental conduct itself and therefore remain operative throughout every exercise of governmental authority affecting private property.

The decision below departs from those principles by permitting permanent forfeiture despite substantial unresolved federal constitutional questions. Unless reviewed by this Court, that

decision threatens to weaken constitutional protections governing civil forfeiture proceedings not only in Alabama but throughout the Nation.

This Court should grant the Petition to reaffirm that the Constitution continuously restrains governmental authority from the commencement of an investigation through the final judicial decree permanently depriving a citizen of private property and to ensure that the protections guaranteed by the Fourth and Fourteenth Amendments remain meaningful safeguards for every citizen of the United States.

### **STATEMENT OF THE CASE**

This case arises from the State of Alabama's permanent forfeiture of Petitioner's privately owned automobile through a civil forfeiture proceeding. Although the proceeding was denominated as civil, the governmental conduct challenged by Petitioner implicated fundamental protections guaranteed by the Fourth and Fourteenth Amendments to the Constitution of the United States.

Petitioner, Lewis Curtis Woodard, lawfully purchased the subject Chevrolet Corvette as an innocent purchaser for value. At the time of purchase, the vehicle bore a facially valid Alabama certificate of

title issued by the State. Petitioner acquired the vehicle without actual or constructive knowledge of any alleged defect in its history and exercised the ordinary diligence expected of a reasonable purchaser relying upon the official records of the State of Alabama.

Following Petitioner's acquisition of the vehicle, governmental authorities initiated an investigation that ultimately resulted in the seizure of the automobile and the commencement of civil forfeiture proceedings pursuant to Alabama law. Throughout

those proceedings, Petitioner consistently maintained that the governmental investigation, search, seizure, continued retention, examination, and ultimate forfeiture of his property violated protections guaranteed by the Fourth and Fourteenth Amendments.

At trial, the State introduced testimony and evidence that Petitioner challenged as constitutionally and legally insufficient. Petitioner objected to testimony offered by witnesses lacking personal knowledge of material facts, challenged the admission of hearsay evidence, and asserted that governmental officials conducted post-seizure examinations of the vehicle without judicial authorization or any recognized exception to the warrant requirement. Petitioner further maintained that the evidentiary foundation supporting forfeiture was derived from governmental conduct inconsistent with the constitutional protections secured by the Fourth Amendment.

Petitioner also asserted that the Due Process Clause prohibited the State from permanently depriving him of private property without meaningful judicial resolution of his preserved federal constitutional objections. He maintained that constitutional protections do not terminate upon seizure but remain operative throughout every governmental action culminating in permanent forfeiture.

The Circuit Court of Mobile County nevertheless entered judgment ordering the permanent forfeiture of Petitioner's property. As a result, title to Petitioner's automobile was transferred to the State despite Petitioner's continuing federal constitutional objections concerning the legality of the governmental conduct upon which the forfeiture depended.

Petitioner timely sought review before the appellate courts of Alabama. In those proceedings, he again asserted that the forfeiture judgment conflicted with the Fourth Amendment's prohibition against unreasonable searches and seizures and the Fourteenth Amendment's guarantee that no State shall deprive any person of property without due process of law. He further argued that the constitutional protections recognized by this Court remain fully applicable throughout civil forfeiture proceedings regardless of the procedural label assigned to the action.

The Supreme Court of Alabama declined to grant relief, leaving the forfeiture judgment undisturbed and the federal constitutional questions unresolved. Having exhausted all available remedies within the courts of Alabama, Petitioner now invokes this Court's jurisdiction pursuant to 28 U.S.C. § 1257(a).

This case presents an appropriate vehicle for this Court's review because the federal constitutional questions were preserved throughout the proceedings below, arise directly from a final judgment of the highest court of a State, and concern recurring issues affecting the constitutional rights of citizens throughout the Nation. The decision below authorizes the permanent deprivation of private property despite substantial unresolved questions concerning the constitutional limitations governing governmental authority during civil forfeiture proceedings.

This Petition therefore seeks review not merely to correct an alleged error in the application of Alabama law, but to reaffirm the enduring constitutional principle that governmental authority remains continuously subject to the restraints imposed by the Fourth and Fourteenth Amendments from the beginning of an investigation until the final

judgment permanently depriving a citizen of private property.

### **REASONS FOR GRANTING THE WRIT**

**THIS CASE PRESENTS AN IMPORTANT AND RECURRING QUESTION OF FEDERAL CONSTITUTIONAL LAW CONCERNING THE CONTINUING APPLICATION OF THE FOURTH AND FOURTEENTH AMENDMENTS TO CIVIL FORFEITURE PROCEEDINGS.**

The Constitution restrains governmental authority at every stage of its exercise. The Fourth Amendment protects the people against unreasonable searches and seizures, and the Due Process Clause of the Fourteenth Amendment prohibits the States from depriving any person of property without due process of law. Neither constitutional protection terminates when the government acquires possession of private property. Rather, both remain operative until governmental authority has been exercised in a manner fully consistent with constitutional requirements.

The judgment below presents a recurring federal constitutional question of exceptional national importance: whether constitutional protections continue to govern governmental conduct throughout civil forfeiture proceedings or whether those protections diminish after the State has seized private property.

This Court has consistently recognized that civil forfeiture proceedings remain subject to constitutional limitations. In *One 1958 Plymouth Sedan v. Pennsylvania*, 380 U.S. 693 (1965), the Court held that the Fourth Amendment applies to forfeiture proceedings because constitutional protections cannot be avoided merely by denominating a proceeding as civil. Likewise, in *United States v. James Daniel Good Real Property*,

510 U.S. 43 (1993), the Court reaffirmed that due process governs governmental efforts to deprive citizens of private property through forfeiture.

Despite these precedents, the decision below permits the State to obtain permanent ownership of Petitioner's property notwithstanding substantial unresolved constitutional objections concerning the investigation, search, seizure, continued retention, examination, and evidentiary foundation supporting forfeiture.

If governmental possession of property is sufficient to diminish constitutional scrutiny, then constitutional protections become progressively weaker as governmental authority becomes progressively greater. That proposition reverses the fundamental design of the Constitution. The Constitution was adopted to restrain governmental power-not to relax constitutional limitations after governmental control has been established.

The consequences of the decision below extend well beyond this litigation. Civil forfeiture statutes authorize governmental entities throughout the Nation to seize automobiles, homes, currency, and countless forms of private property. The constitutional limitations governing those proceedings should not vary according to jurisdiction or procedural characterization. Uniform application of the Fourth and Fourteenth Amendments is essential to preserving the constitutional balance between governmental authority and individual liberty.

Only this Court can provide definitive guidance concerning whether constitutional protections remain continuously applicable throughout every phase of civil forfeiture proceedings. Because the judgment below implicates recurring constitutional questions affecting citizens nationwide, review is warranted,

This Court should grant the Petition to reaffirm that governmental authority remains constitutionally restrained from the commencement of an investigation through the final judicial decree permanently transferring private property to the State.

**THE DECISION BELOW CONFLICTS WITH THIS COURT'S ESTABLISHED FOURTH AMENDMENT AND DUE PROCESS JURISPRUDENCE.**

The judgment below cannot be reconciled with this Court's longstanding recognition that constitutional protections remain fully applicable throughout civil forfeiture proceedings. The Fourth Amendment regulates governmental conduct, not merely criminal prosecutions, and the Due Process Clause protects citizens against arbitrary governmental deprivation of property regardless of the procedural label attached to the proceeding.

Throughout the litigation below, Petitioner consistently asserted that governmental officials exceeded constitutional limitations during the investigation, search, seizure, continued retention, and post-seizure examination of his property. Petitioner further objected to evidence introduced in support of forfeiture on the grounds that it included testimony lacking personal knowledge, inadmissible hearsay, and evidence derived from governmental conduct alleged to violate the Fourth Amendment.

Despite these preserved constitutional objections, the courts below authorized the permanent forfeiture of Petitioner's property without meaningful judicial resolution of the federal constitutional issues upon which the validity of the forfeiture depended.

That result conflicts directly with this Court's precedents. In *Soldal v. Cook County*, 506 U.S. 56 (1992), this Court reaffirmed that the Fourth

Amendment protects possessory interests in property independent of criminal prosecutions. In *One 1958 Plymouth Sedan v. Pennsylvania*, 380 U.S. 693 (1965), the Court held that the protections of the Fourth Amendment apply with full force to civil forfeiture proceedings. Likewise, *United States v. James Daniel Good Real Property*, 510 U.S. 43 (1993), recognized that due process imposes meaningful constitutional limitations before the government may permanently deprive an individual of property.

The decision below effectively permits the State to accomplish indirectly what the Constitution prohibits directly. By allowing unresolved constitutional violations occurring during investigation, search, seizure, and post-seizure examination to culminate in permanent forfeiture, the judgment below allows governmental possession itself to become the basis for diminished constitutional scrutiny.

The Constitution recognizes no such exception. Governmental authority does not become less accountable after property has been seized. Each successive exercise of governmental power must independently satisfy the constitutional requirements imposed by the Fourth and Fourteenth Amendments before ownership may lawfully be transferred from a private citizen to the State.

The conflict between the judgment below and this Court's constitutional jurisprudence presents an important federal question warranting review. Unless corrected, the decision below invites the erosion of constitutional protections by permitting civil forfeiture proceedings to proceed without meaningful adjudication of substantial federal constitutional objections concerning the legality of the governmental conduct upon which forfeiture depends.

Accordingly, this Court should grant the Petition to reaffirm that constitutional protections remain fully operative throughout every stage of civil forfeiture proceedings and that governmental authority remains continuously subject to the commands of the Fourth and Fourteenth Amendments.

THIS CASE PRESENTS AN EXCEPTIONALLY IMPORTANT CONSTITUTIONAL QUESTION REGARDING THE LIMITS OF GOVERNMENTAL POWER TO PERMANENTLY DEPRIVE A CITIZEN OF PRIVATE PROPERTY.

This case presents a constitutional question of exceptional national importance because it concerns the continuing limits imposed upon governmental authority by the Fourth and Fourteenth Amendments.

The issue extends beyond the interests of the parties and affects every citizen whose property may become the subject of governmental forfeiture.

The Constitution establishes a government of limited powers. Its guarantees are not procedural formalities but substantive restraints upon governmental authority. The Fourth Amendment prohibits unreasonable searches and seizures, while the Fourteenth Amendment ensures that no State may deprive any person of property without due process of law. These constitutional commands remain operative until governmental authority has been lawfully exercised in accordance with the Constitution.

The judgment below departs from these principles by permitting the State to permanently acquire Petitioner's property notwithstanding substantial unresolved constitutional objections concerning the governmental conduct upon which the forfeiture depended. If allowed to stand, the decision effectively

permits constitutional protections to diminish as governmental control over private property increases.

Such a rule is incompatible with the constitutional structure. Constitutional rights do not weaken because governmental authority becomes more extensive. Rather, the greater the governmental intrusion upon private property, the greater the necessity for faithful adherence to constitutional limitations.

This Court has repeatedly recognized that property ownership occupies a central place within the liberties protected by the Constitution. The Framers understood that the arbitrary exercise of governmental authority over private property represented one of the principal dangers against which constitutional protections were directed. Consequently, the Fourth and Fourteenth Amendments were adopted to ensure that governmental power remains accountable to constitutional limitations before property may be permanently taken from its owner.

The decision below threatens those protections by allowing unresolved constitutional questions concerning governmental investigation, search, seizure, retention, and evidentiary conduct to culminate in permanent forfeiture. Such an approach weakens the constitutional safeguards designed to preserve individual liberty and private property against governmental overreach.

The significance of this issue is amplified by the widespread use of civil forfeiture statutes throughout the United States. Governments routinely exercise forfeiture authority affecting automobiles, homes, currency, businesses, and other forms of private property. Uniform constitutional standards governing those proceedings are essential to

preserving equal protection of constitutional rights throughout the Nation.

Absent this Court's intervention, uncertainty will persist concerning whether constitutional protections remain fully effective throughout civil forfeiture proceedings or whether governmental possession itself diminishes constitutional accountability. Only this Court possesses the authority to resolve that

important federal question and to reaffirm that constitutional restraints remain continuous from the commencement of governmental investigation through the final judicial decree permanently transferring private property to the State.

Because the decision below presents an exceptionally important and recurring constitutional question affecting the liberty and property interests of citizens nationwide, this Court should grant the Petition for a Writ of Certiorari.

**THIS CASE IS AN EXCELLENT VEHICLE FOR RESOLVING AN IMPORTANT QUESTION OF FEDERAL CONSTITUTIONAL LAW.**

This case presents an ideal vehicle through which this Court may resolve an important and recurring question concerning the continuing application of the Fourth and Fourteenth Amendments to civil forfeiture proceedings. The federal constitutional issues were timely raised, consistently preserved, and remain dispositive of the validity of the judgment below.

Petitioner asserted throughout the proceedings that the governmental investigation, search, seizure, continued retention, examination, and ultimate forfeiture of his property violated rights secured by the Constitution of the United States. Those objections were presented to the trial court and renewed throughout the appellate proceedings,

thereby preserving the federal questions for this Court's review.

This Petition does not ask the Court to resolve disputed issues of state law or to reconsider factual determinations committed exclusively to the state courts. Instead, it asks whether the Federal Constitution permits a State to permanently deprive a citizen of private property where substantial constitutional objections concerning the legality of the governmental conduct remain unresolved.

Because the constitutional questions are squarely presented, this case allows the Court to clarify an issue affecting civil forfeiture proceedings nationwide without becoming entangled in collateral questions of state statutory interpretation. The constitutional issue is both cleanly presented and outcome determinative.

Moreover, the record demonstrates the practical importance of the question presented. Petitioner acquired the subject property as an innocent purchaser for value, relying upon a facially valid Alabama certificate of title issued by the State itself. He consistently challenged the constitutional sufficiency of the governmental conduct supporting forfeiture and objected to evidence he contended was constitutionally and legally deficient. Nevertheless, the State ultimately acquired permanent ownership of his property without meaningful judicial resolution of those preserved constitutional claims.

This case therefore illustrates the precise constitutional danger presented when governmental authority is permitted to expand without corresponding constitutional accountability. If constitutional objections concerning governmental conduct may remain unresolved while ownership is permanently transferred to the State, the protections guaranteed by the Fourth and Fourteenth Amendments become increasingly ineffective as

governmental control over private property increases.

The importance of this issue cannot be overstated. Civil forfeiture has become a significant component of law enforcement throughout the Nation. Every jurisdiction exercising forfeiture authority must remain subject to uniform constitutional limitations. The protections guaranteed by the Constitution cannot vary according to geography or procedural classification. Citizens are entitled to the same constitutional safeguards whether governmental authority is exercised through criminal prosecution or civil forfeiture.

Only this Court can ensure the uniform interpretation and application of these constitutional protections. Granting certiorari in this case will provide needed guidance to state and federal courts, protect the integrity of the Fourth and Fourteenth Amendments, and reaffirm that constitutional

restraints continue to govern governmental authority throughout every stage of a civil forfeiture proceeding.

## **CONCLUSION**

The Constitution of the United States does not permit governmental authority to expand as constitutional protections diminish. The Fourth Amendment and the Due Process Clause of the Fourteenth Amendment impose continuous restraints upon the exercise of governmental power from the inception of an investigation through the final judgment permanently depriving a citizen of private property. Those constitutional guarantees remain fully operative throughout civil forfeiture proceedings and may not be avoided by characterizing the proceeding as civil rather than criminal.

The judgment below authorizes the permanent forfeiture of Petitioner's property notwithstanding substantial preserved federal constitutional objections concerning the investigation, search, seizure, continued retention, examination, and evidentiary foundation upon which the forfeiture depended. In doing so, the decision departs from this Court's established Fourth Amendment and Due Process jurisprudence and presents an important and recurring question affecting the constitutional rights of citizens throughout the United States.

This case provides an appropriate vehicle for this Court to reaffirm that governmental authority remains continuously subject to constitutional restraint and that the protections guaranteed by the Fourth and Fourteenth Amendments do not expire once the government acquires possession of private property.

Uniform application of these constitutional principles is essential to preserving the balance between governmental authority and individual liberty established by the Constitution.

Because the questions presented are substantial, recurring, and of exceptional national importance, the Petition for a Writ of Certiorari should be granted.

### **PRAYER FOR RELIEF**

WHEREFORE, Petitioner, Lewis Curtis Woodard, respectfully prays that this Honorable Court:

Grant this Petition for a Writ of Certiorari;

Review the judgment of the Supreme Court of Alabama;

Hold that the Fourth Amendment and the Due Process Clause of the Fourteenth Amendment impose continuing constitutional limitations upon governmental authority throughout the

investigation, search, seizure, retention, examination, and permanent forfeiture of private property;

Reverse the judgment below, or, alternatively, vacate the judgment and remand the case for proceedings consistent with this Court's opinion; and

Grant such other and further relief as this Court deems just and proper. Respectfully submitted,

IVAN LYNN PARKER

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### **CERTIFICATE OF SERVICE**

I, Ivan Lynn Parker, Counsel of Record for Petitioner, certify that, in accordance with Rule 29 of the Rules of the Supreme Court of the United States, a true and correct copy of this Petition for a Writ of Certiorari has been served by first-class United States Mail, postage prepaid, upon the following counsel of record:

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Dated this                      day of                      , 2026.  
Respectfully submitted,

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## **APPENDIX**

### **Appendix A**

Order of the Supreme Court of Alabama entered  
May 26, 2026.

### **AppendixB**

Order denying Petitioner's Application for  
Rehearing.

### **Appendix C**

Final Judgment of the Circuit Court of Mobile  
County, Alabama.

### **AppendixD**

Relevant excerpts from the trial transcript  
preserving Petitioner's Fourth Amendment,  
Fourteenth Amendment, evidentiary, and due-  
process objections.

### **AppendixE**

Petitioner's post-judgment motions and related  
orders.

### **AppendixF**

Relevant constitutional and statutory provisions.

## **Appendix G**

Other portions of the record necessary for a full understanding of the Questions Presented.

### **CERTIFICATE OF COMPLIANCE**

Pursuant to Rule 33 of the Rules of the Supreme Court of the United States, counsel certifies that this Petition complies with the applicable word limitations and formatting requirements prescribed by the Rules of this Court.

Respectfully submitted,  
*/s/ivanparker*  
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