

IN THE CIRCUIT COURT OF HINDS COUNTY, MISSISSIPPI

AERRIONE GREEN

Petitioner

25-499

v.

**CALVIN WILLIAMS, THE TOWN OF UTICA, LISA MORRIS IN HER OFFICIAL
CAPACITY AS MUNICIPAL CLERK, AND THE MUNICIPAL ELECTION
COMMISSIONERS OF THE TOWN OF UTICA**

Respondents

**PETITION TO CONTEST THE RESULTS OF THE MUNICIPAL ELECTION FOR
MAYOR OF UTICA, MISSISSIPPI**

COMES NOW, Aerrione Green, a qualified elector and Democratic nominee for Mayor in the June 3, 2025, Municipal Election for the Town of Utica, Mississippi, pursuant to Miss. Code Ann. § 23-15-951 et seq., and files this Petition to contest the results of the election, and in support thereof would respectfully show the Court the following:

PARTIES

1. **Petitioner**, Aerrione Green, is an adult resident of Hinds County, Mississippi, a duly qualified elector of the Town of Utica, and the certified Democratic nominee for Mayor in the 2025 municipal election.
2. **Respondent**, Calvin Williams, is an adult resident of Hinds County, Mississippi, and resides in the Town of Utica. He was certified as the winner of the June 3, 2025, general election for Mayor.
3. **Respondent**, Lisa Morris, is the Municipal Clerk of the Town of Utica and was responsible for election preparations, ballot security, absentee ballot processing, and communication with state election offices.
4. **Respondents**, the Municipal Election Commissioners of the Town of Utica, are charged with conducting elections and certifying the results of the June 3, 2025, municipal election.
5. **Respondent**, the Town of Utica, Mississippi, is the municipal government entity responsible for ensuring compliance with state election law and safeguarding the integrity of the election process.

JURISDICTION AND VENUE

6. This Court has jurisdiction pursuant to Miss. Code Ann. § 23-15-951. Venue is proper in this Court as the election was held in Hinds County, Mississippi, and all Respondents reside, hold office, or are situated within the county.
7. Respondent Calvin Williams resides in the Town of Utica, Hinds County, Mississippi.
8. Respondent Lisa Morris, Municipal Clerk, resides and holds office in the Town of Utica, Hinds County.
9. The Town of Utica is located in Hinds County, and its governing officials and Election Commissioners are subject to the jurisdiction of this Court.

BASIS FOR CONTEST

10. Petitioner contests the results of the June 3, 2025, general municipal election for Mayor of Utica on the basis of numerous and material violations of Mississippi Election Law, constitutional provisions, and election integrity standards, including but not limited to:
 - a. **Failure to properly secure and administer voting equipment and materials**, including the absence of DS200 voting machine keys in sealed bags, lack of privacy dividers, and the unsecured and unsupervised placement of ballots and election-related documents.
 - b. **Failure to provide official voter sign-in books at the opening of polls**, which forced poll managers to use unofficial log sheets. These logbooks were not delivered until well after voting had begun, violating statutory procedure and creating the risk of unauthorized or duplicate voting.
 - c. **Failure to implement and use updated ward maps adopted by the Board of Aldermen on October 3, 2023**, resulting in numerous voters receiving ballots for the wrong ward races, thereby affecting the accuracy and validity of votes cast.
 - d. **Allowing ineligible voters to cast ballots**, including individuals who no longer reside in the Town of Utica but remain on the voter roll due to lack of proper voter roll maintenance, in violation of state and federal standards.
 - e. **Failure to properly process affidavit and absentee ballots** according to Mississippi Code §§ 23-15-631 and 23-15-639, including missing municipal clerk initials, lack of verification through SEMS, and delayed tabulation beyond the legally required timeline.
 - f. **Electioneering and unlawful campaigning within the 150-foot buffer zone**, including documented instances of State Representative Stephanie Foster and Supervisor Bobby “Bobcat” McGowan engaging with voters, directing votes, and appearing in the polling place without proper credentials or legal authority.

g. Use of intimidation, misinformation, and improper influence on voters, including hostile interactions between public officials and poll workers, disruptions by candidates, and instructions given to elderly or disabled voters on how to vote—some of which occurred within the voting area itself.

h. Improper ballot box handling and result certification, including uncounted affidavit and absentee ballots at the close of polls, manual vote counting after the machine tape had been run, and discrepancies in vote totals.

i. Violations of transparency and procedural compliance, including the Town of Utica's failure to transmit adopted ward map updates to the Secretary of State and to the Statewide Election Management System (SEMS), raising serious questions about whether the election was conducted in the proper precinct boundaries and in compliance with law.

j. Breach of public trust and equal protection under the law, as Petitioner and other voters were denied a fair and secure election process, including the right to vote free from intimidation, confusion, and procedural failure.

11. These cumulative and compounding irregularities materially affected the outcome of the election, created an unfair advantage for the Respondent, and denied the citizens of Utica their constitutional and statutory rights to a fair and lawful election.

FACTUAL BACKGROUND

12. On June 3, 2025, the election for Mayor was conducted at the Evelyn Taylor Marjure Library, located at 217 West Main Street Utica, MS. 39175. Upon arrival shortly after 7:00 AM to coordinate lawful campaign activities outside the 150-foot boundary, the Petitioner witnessed State Representative Stephanie Foster standing in the road at the entry of the polling place stopping vehicles and instructing voters not to vote for Petitioner but instead to vote for Respondent, Calvin Williams. Foster was not a poll watcher and held no credentials yet used her official capacity and influence to sway voters.

13. Petitioner witnessed Representative Foster tell a voter that Petitioner would only be a "sitting body" and that she and Calvin Williams were already working to bring millions to Utica, further influencing voter choice.

14. On election morning, the precinct did not have official voter sign-in books. Poll Manager Regina Gail Webber had to create sign-in sheets manually. The official logbooks were not delivered until after 9:00 AM by Municipal Clerk Lisa Morris.

15. There were four different wards, each with its own ballot, yet numerous voters—including Petitioner—were issued ballots for the incorrect ward. Aldermen races were uncontested, but incorrect ballots resulted in improper voting across ward lines.

16. There were ballots brought to the poll on election morning by Municipal Clerk Lisa Morris found loose with markings in the manila folder along with the DS200 tape.
17. Affidavit voters were allowed to vote without verification through SEMS. Clerk Lisa Morris could not verify addresses and contacted Madalan Lennep of Pharos Consulting to check addresses via phone.
18. Seven out of nine absentee ballots were missing municipal clerk initials and were thus invalid under election law.
19. The absentee and affidavit ballots were not counted on election night. The machine tape was run prior to tabulation of these ballots. The count was finalized manually on June 5, 2025, at City Hall.
20. The DS200 keys were missing from the bag containing the numbered ID tags and tapes before the polls opened. They were later found in a supply bag and not sealed. This represents a major procedural failure.
21. District 5 Supervisor Bobby "Bobcat" McGowan entered the polling place and sat with Calvin Williams. He was not a credentialed poll watcher. Poll managers had to ask him to leave multiple times.
22. Multiple written statements from poll managers (Regina Gail Webber, Toronda Robinson), voters (John Howard, Deneen Anderson Brown), and notes found in the ballot box review confirm voter intimidation, influence by elected officials, process irregularities, and unlawful campaigning inside and outside the polling location.
23. During the June 13, 2025, ballot box examination (scheduled after Petitioner gave proper written notice to both Respondent and the Municipal Clerk), the following was discovered:
 - a. Misplaced or missing affidavit ballots
 - b. Discrepancies in total ballots cast (216 signed in, but machine tape reflected 205 votes)
 - c. Notes from poll managers about disruptive voters, improper voter assistance, and electioneering
17. CMPDD confirmed via email that ward maps for the Town of Utica were updated and adopted by the town on October 3, 2023. However, the Municipal Clerk failed to report or transmit these maps to the Secretary of State's office or the Election Commissioners. SEMS was not updated to reflect the current ward boundaries.
18. Over 50 individuals currently listed on the voter roll no longer reside in the Town of Utica. Many individuals traveled from outside jurisdictions to vote in the June 3, 2025, election.
19. Petitioner filed formal complaints with the Mississippi Attorney General's Office, Secretary of State's Office, and the U.S. Department of Justice outlining these violations. Supporting documentation includes signed affidavits, poll manager notes, public statements from voters, and screenshots of irregularities shared on social media.
20. The cumulative effect of these irregularities is sufficient to call the validity of the entire election into question. Petitioner maintains that these actions influenced the outcome of the election and deprived voters of a fair electoral process.

RELIEF REQUESTED

WHEREFORE, PREMISES CONSIDERED, Petitioner respectfully requests that this Honorable Court:

1. Issue a Rule to Show Cause to Respondents.
2. Set a hearing on this Petition at the earliest opportunity.
3. Subpoena all records, logs, ballots, and devices from the Town of Utica related to the June 3, 2025, election.
4. Permit Petitioner to present all affidavits, documentation, poll notes, and exhibits in support.
5. Invalidate the June 3, 2025, election results due to fraud, misconduct, and material procedural violations.
6. Order a new election for Mayor of Utica, Mississippi; and
7. Grant all further relief as this Court deems just and proper.

Respectfully submitted,

Aerrione Green

Aerrione Green, Petitioner

STATE OF MISSISSIPPI

COUNTY OF HINDS

Subscribed and sworn to before me, the undersigned authority, on this the 20th day of June, 2025.

Doris L. Ross

Notary Public

My Commission Expires: Commission Expires



EXHIBIT LIST

1. Affidavit of Toronda Robinson (Poll Manager)
2. Affidavit of Regina Gail Webber (Poll Manager)
3. Affidavit of John Howard (Voter)
4. Affidavit of Deneen Anderson Brown (Voter)
5. Notes Found in Ballot Box from Poll Managers (June 13, 2025)
6. Screenshots from Facebook documenting public interference and voter discussion
7. Petitioner's Written Notice for Ballot Box Examination
8. Email correspondence between Petitioner, Clerk, and Respondent
9. Copy of Election Recapitulation Sheet (with discrepancies noted)
10. Maps adopted October 3, 2023, by the Town of Utica (CMPDD documents)
11. Public records requests sent to Town of Utica Municipal Clerk, Hinds County Circuit Clerk, and Mississippi Secretary of State
12. DOJ, AG, and SOS complaint filings by Petitioner
13. List of voters who no longer reside inside of the city limits of Utica yet cast ballots
14. Social media posts from voters discussing irregularities, ballot handling, and voter interference

(All exhibits will be furnished upon request or during hearing presentation.)