

IN THE CIRCUIT COURT OF LEFLORE COUNTY, MISSISSIPPI

JAMES K. LITTLETON

PLAINTIFF

VS.

CIVIL ACTION FILE NO.: 2022-0055 CICI

**KEVIN ADAMS, TAMMY ADAMS
AND CHARLES STEVENSON
A/K/A CHARLIE STEVENSON**

DEFENDANTS

AMENDED COMPLAINT

TO THE HONORABLE CIRCUIT COURT OF LEFLORE COUNTY:

JURY TRIAL DEMANDED:

COMES NOW Plaintiff, James K. Littleton, and pursuant to M.C.A. Section 95-1-1, et al, of 1972 Amended, and pursuant to common law and files this his libel, and slander and defamation amended complaint against Defendant, Kevin Adams, and for cause will show unto the Court as follows, to-wit:

- 1. Plaintiff, James K. Littleton, is an adult resident citizen and licensed practicing attorney of Leflore County, Mississippi. Plaintiff is a candidate for Leflore County & Youth Court Judge in the November 8, 2022 General Election.**
- 2. Defendant, Kevin Adams, is an adult resident citizen of Leflore County, Mississippi. Defendant, Kevin Adams, is the current Leflore County & Youth Court Judge and is a candidate in the November 8, 2022 General Election.**
- 3. Defendant, Charles Stevenson a/k/a Charlie Stevenson (hereinafter referred to as Charlie Stevenson), is an adult resident citizen of Leflore County, Mississippi, and may be served with a copy of the complaint at 701 Avenue J, Greenwood, Mississippi.**

4. Defendant, Tammy Adams, is an adult resident citizen of Leflore County, Mississippi, and may be served with a copy of the complaint at 511 Robert E. Lee Drive, Greenwood, Mississippi.
5. On or about Friday, September 2, 2022, in Schlater, Mississippi, and on or about Defendants, Kevin Adams, Tammy Adams, and Charlie Stevenson, disseminated flyers which were prepared by the Greenwood Commonwealth at Kevin Adams request. Kevin Adams, Tammy Adams, and Charlie Stevenson disseminated the flyers with information on it which they knew was false and/or disseminated the flyer in reckless disregard for the truth. A copy of Kevin Adams campaign card is attached hereto as Exhibit "A". A copy of the flyer which Defendants, Kevin Adams, Tammy Adams, and Charlie Stevenson, disseminated is attached hereto as Exhibit "B". Defendants, Kevin Adams, Tammy Adams, and Charlie Stevenson, folded the flyer so that it would fit Adams' campaign card and would hand it to residents and voters of Leflore County, Mississippi as they went door-to-door campaigning.
6. On or about Saturday, September 3, 2022, in the Minter City, Mississippi, and Defendants, Kevin Adams and Tammy Adams, disseminated flyers which were prepared by the Greenwood Commonwealth at Kevin Adams request. Kevin Adams and Tammy Adams disseminated the flyers with information on it which they knew was false and/or disseminated the flyer in reckless disregard for the truth. Defendants, Kevin Adams and Tammy Adams, folded the flyer so that it would fit Adams' campaign card and would hand it to residents and voters in the Minter City Community in Leflore County, Mississippi as they went door-to-

door campaigning. Plaintiff, James K. Littleton learned on this dissemination of false statements by Kevin Adams and Tammy Adams, in the Minter City, Mississippi community on September 14, 2022, when speaking with two (2) Minter City residents while in Sidon, Mississippi. That based upon this communication with the two (2) Minter City residents in Sidon, MS, it is evident that the dissemination of information known to be false by Defendants is widespread and has damaged the good name, character, reputation and standing in the community of James K. Littleton.

7. The information disseminated by Kevin Adams highlights an article written by Bryn Stole, a reporter employed by the Greenwood Commonwealth on August 21, 2014, and not on September 21, 2014, as incorrectly stated on the flyers. The article headline is **“Judicial Candidate Accused Of Forgery.”** The flyer states, **“Leflore County Justice Court Judge James K. Littleton, III, has been accused by his family in official public records of forging signatures on land records to his late father’s estate.”** The headline and the accusation of bribery on the flyer were in a font much larger than the remaining information on the flyer.
8. Again on or about September 3-5, 2022, in Itta Bena, Mississippi, Defendants, Kevin Adams and Charlie Stevenson, disseminated flyers which were prepared by the Greenwood Commonwealth. Kevin Adams and Charlie Stevenson disseminated flyers with information on it which they knew was false and/or disseminated the flyer in reckless disregard for the truth.

9. Again on or about September 6, 2022, in Greenwood, Mississippi, near the area of Greenwood High School, Defendants, Kevin Adams and Charlie Stevenson, disseminated flyers which were prepared by the Greenwood Commonwealth. Kevin Adams and Charlie Stevenson disseminated flyers with information on it which they knew was false and/or disseminated the flyer in reckless disregard for the truth.
10. Again, at a date and time unknown to Plaintiff, Defendants, Kevin Adams, Tammy Adams, Charlie Stevenson and others disseminated flyers which were prepared by the Greenwood Commonwealth in the Sidon, Mississippi Community. Kevin Adams, Tammy Adams, Charlie Stevenson and others disseminated flyers with information on it which they knew was false and/or disseminated the flyer in reckless disregard for the truth. Plaintiff, James K. Littleton learned on this dissemination of false statements by Kevin Adams, Tammy Adams, Charlie Stevenson and others in the Sidon, Mississippi community on September 14, 2022, when a group of young men were holding the flyers in question and discussing it as James Littleton and his campaign workers walked by the group of young men.
11. On or about September 7, Plaintiff delivered a cease and desist letter, a copy of which is attached hereto as Exhibit "C", requesting that Defendants, Kevin Adams and Charlie Stevenson, refrain from disseminating the false information and providing Defendants with a Court order which reflects that the Court found that he did not forge documents as falsely alleged by his mother and sister in the Bolivar County Chancery Court Cause Number in the Estate of James

Littleton, Jr. Plaintiff hand delivered a copy of the September 7th letter to Defendant, Charlie Stevenson, and left a copy of the letter in Judge Kevin Adams box in which he retrieved on said date.

- 12. Despite Plaintiff's request to Defendant, Kevin Adams and Charlie Stevenson, that they cease and desist disseminating this false information about Plaintiff, James K. Littleton; Defendants continued to disseminate this false information to Leflore County residents in the Fairfield Subdivision and the Johnson Subdivision on Saturday, September 10, 2022.**
- 13. At all times prior to the preparation, publication and dissemination of the flyers referred to herein, Defendants, Kevin Adams, Tammy Adams and Charlie Stevenson were aware that the allegations of forgery brought by James K. Littleton's family members were false but they continued to disseminate the flyers to Leflore County Voters and Residents anyway knowing they were false. Defendants, Kevin Adams, Tammy Adams and Charlie Stevenson, actions were committed with malice aforethought and constitute the type of actual malice required in New York Times v. Sullivan.**
- 14. Upon information and belief, approximately four (4) thousand registered voters reside in the areas where Defendants, Kevin Adams, Tammy Adams and Charlie Stevenson disseminated this false information.**
- 15. That the act and conduct of Defendants were wilfully, deliberately, intentional, malicious, slanderous, libelous, false with actual malice and with the designed purpose to defame plaintiff's good name, character, reputation and standing in**

the community and to create a hardship to Plaintiff's bid in running for Leflore County & Youth Court Judge and his legal practice.

16. That at all times prior to and during the publication and dissemination of Kevin Adams flyer and advertisement, Defendants, Kevin Adams, Tammy Adams and Charlie Stevenson, knew that Plaintiff did not forge any deeds or any other documents as they falsely alleged in the flyer attached hereto because Kevin Adams and Charlie Stevenson had been provided documentation and proof that the allegations from 2014 were false when made by James K. Littleton's family members.

17. That the Greenwood Commonwealth was at least negligent in preparing the flyer since it was aware that there was ongoing litigation in 2014 in Bolivar County Chancery Court Cause Numbers 2010-0276 and 2013-0255 and it failed to obtain a copy of the final decree or court order prior to publishing this document for Kevin Adams. The Greenwood Commonwealth is not being made a party to this litigation since they were not responsible for disseminating this false information. In the event that discovery should indicate that the Greenwood Commonwealth played a larger role than preparing this document, Plaintiff will seek to amend the complaint to add the Greenwood Commonwealth as a party defendant.

18. That as a direct and proximate cause of the acts of Defendants, Kevin Adams , Tammy Adams, and Charlie Stevenson, described herein, Plaintiff has sustained harm to his good name, character, reputation and standing in the community.

19. That Defendants, Kevin Adams, Tammy Adams, and Charlie Stevenson, are so intent on harming the good name, character, reputation and standing of James K. Littleton in the community that they did not conduct a search or inquiry with the Bolivar County Chancery Clerk's Office, the Bolivar County Tax Assessor's Office, the Leflore County Chancery Clerk's Office, and the Leflore County Tax Assessor's Office to determine if James K. Littleton still owned the two (2) properties in question at the time of the dissemination of false information regarding the forgery of deeds. That James K. Littleton no longer owns either of the properties in question and sold both properties several years prior to the year 2022.
20. That Plaintiff, James K. Littleton, was able to sell the 40 acre tract which he was accused of forging the deed because the Bolivar County Chancery Court entered an order that the deeds were valid and not forged and that he did in fact own the land in question which he had been falsely accused of forging the deeds on. Defendants either failed to obtain a copy of the court order resolving the Estate of James Littleton or recklessly disregarded the outcome of the litigation in the Estate of James Littleton in Bolivar County Chancery Court Cause Numbers 2010-0276 and 2013-0255.
21. At all times hereto, Defendant, Kevin Adams, paid for and approved the flyers which were prepared by the Greenwood Commonwealth at his direction and request as evidenced by the disclaimer on the bottom of the flyers that he and Tammy Adams, Charles Stevenson and other disseminated.

22. That, Plaintiff, James Littleton, began receiving phone calls that Defendant, Kevin Adams, and his campaign workers were handing out flyers to residents at Curtis Moore apartments on September 19, 2022. Despite Plaintiff's request to Defendant, Kevin Adams, that he cease and desist disseminating this false information about Plaintiff, James K. Littleton; Defendant continued to disseminate this false information at Curtis Moore Apartments in Greenwood, Leflore County, Mississippi on Monday, September 19, 2022, approximately five (5) days after the filing of the original lawsuit which was served on Defendant, Kevin Adams. After arriving at Curtis Moore Apartments, the flyers attached hereto as Exhibit "D" were found on many of the doors of the apartments where residents were not home when Defendant, Kevin Adams, distributed the flyers.

WHEREFORE PREMISES CONSIDERED, Plaintiff prays for compensatory damages from and against the Defendants in an amount to compensate him for the injury caused by Defendants.

WHEREFORE PREMISES CONSIDERED, Plaintiff prays for punitive damages from and against the Defendants in the amount sufficient to deter Defendants from committing the type of actions complained of herein.

WHEREFORE PREMISES CONSIDERED, Plaintiff prays for attorney fees and such other further and general relief deemed just, fair and equitable by the Court against the Defendants herein.



James K. Littleton

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