



IN THE CIRCUIT COURT OF MOBILE COUNTY, ALABAMA

DR. CHARLES BROWN

Plaintiff

vs.

SINCLAIR MEDIA, INC., SINCLAIR BROADCASTING, DEERFIELD MEDIA, INC D/B/A WPMI 15 and Fictitious Parties A, B, C, D, E, F and/or G, the persons, firms or corporations or other legal entities responsible for the act of defamatory broadcasting statements made on or about May 27, 2022 the employers or supervisors of the persons, firms, or corporations, or other legal entities responsible for the defamatory broadcasting statements, at the times and places made the basis of this lawsuit; all of whose true names and legal identities are otherwise unknown to the Plaintiff at this time, but will be added by amendment when ascertained, individually, and jointly,

Defendant

CIVIL ACTION NUMBER

JURY TRIAL REQUESTED

COMPLAINT

COMES NOW Plaintiff, DR. CHARLES BROWN, in the above-styled matter, by and through undersigned counsel, and files this Complaint against Defendants, SINCLAIR MEDIA, INC., SINCLAIR BROADCASTING, DEERFIELD MEDIA, INC. D/B/A WPMI 15; and FICTITIOUS DEFENDANTS, A, B, C, and/or D, and for causes of action would respectfully show unto the Court the following:

NATURE OF THE ACTION

1. This defamation action arises from a false and defamatory news article on television on Channel 15 WPMI, on May 27, 2022, newscast in Mobile, Alabama.
2. The article claims that plaintiff a long-time minister and pastor of the Government Street Baptist Church was a child molester which was a false and defamatory statement.
3. The publication's clear implication was Plaintiff was a child molester and was categorically and demonstrably false. Plaintiff has never abused or molested any child. Allegations against him were false when they were made in 2022. They were part of a scheme to generate "Headline" grabbing attention for the Defendants. The false allegations against Plaintiff have been conclusively refuted by Plaintiff and Defendants representatives have admitted they were false.
4. Defendant's remarks in the news program were false, and it defamatory *per se*. WPMI15 falsely implied that Plaintiff was guilty of child molestation, which is a crime involving moral turpitude. Moreover, the Defendants false accusations prejudiced Plaintiff in his career as a minister and incalculably (and immediately) damaged his reputation as a minister.
5. Unsurprisingly, Plaintiff's reputation and career were devastated when Defendants first accused him of child molestation. Defendants' allegations were timed to coincide with the time of the day that would garner the most viewers in the public viewing area where it was broadcast. The false allegations Plaintiff faced brought public scorn and mental anguish. Defendants knew exactly the effect that the

broadcast would have on Plaintiff as evidenced by the fact they admitted their regulations and procedures prohibited this type of publication without verification.

6. Plaintiff brings this defamation action to clear his name. By this civil lawsuit, Plaintiff seeks to restore his reputation and establish Defendants liability for pushing a false narrative that he was a child molester. Plaintiff seeks an award of compensatory damages for the reputational harm that he suffered as a result of Defendants' false and defamatory remarks that Plaintiff was a child molester for an amount to be determined by a jury. Further, given the willfulness and maliciousness that Defendants demonstrated when Defendants knowingly published the articles with the false allegations Plaintiff was a child molester Plaintiff also seeks an award of PUNITIVE DAMAGES in the amount of \$10,000,000.00 (Ten million dollars and no/100).

PARTIES

7. Plaintiff Dr. Charles Brown is an individual and a resident of the State of Alabama. For Decades, he has been on of the most prominent Southern Baptist Ministers in the State.
8. The Defendants are corporations doing business and authorized to do business in the State of Alabama.

JURISDICTION AND VENUE

9. This Court has specific personal jurisdiction under the Alabama long-arm statute, Alabama Code §4.2 and §12-12-30, as well as under the Due Process Clause of the U.S. Constitution, because, among other things, the causes of action in this

Complaint arise from Defendant transacting business in this state and causing tortious injury by an act or omission in this state. Moreover, exercising jurisdiction would not offend traditional notions of fair play and substantial justice because Defendant should have reasonably foreseen being haled into an Alabama court to account for their false and defamatory statement which was published: on a Television station located in Mobile, Alabama. The Television setting that is created on a digital platform in Alabama and routed through servers and airwaves in Alabama. The Television station has a wide circulation in the Mobile area for viewing. Further, Defendant published false and defamatory information to promote their news program for viewing by Alabama audiences.

10. Venue is proper in this Circuit Court under Alabama Code §3-6-7, because the causes of action asserted herein arose in this Circuit.

FACTS

11. Plaintiff has been a prominent minister in the Mobile, Alabama area over the last five (5) decades. He has a wide name recognition and has played a diverse role in promoting Christianity throughout Alabama.

12. He recently retired as pastor of Government Street Baptist Church where he pastored for 45 years.

13. Government Street Baptist Church has a broad-based Christian ministry which includes a large children's ministry and a day care for children.

14. Never in all of his years of ministry has the Plaintiff ever had a complaint made against him based on improper sexual conduct in any manner.

15. Plaintiff has built a reputation of honesty and impeccable personal conduct during over 50 years of pastoring a number of churches in Alabama and Mississippi.
16. Because of Plaintiff's impeccable reputation he has been selected by his peers to serve on a number of boards in the state and national Southern Baptist conventions as well as Baptist institutions of higher learning.
17. This reputation painstakingly created over more than 50 years in the Christian Ministry was ruthlessly and permanently damaged by a false, defamatory misleading and denigrating television broadcast by defendant and their agents, servants and/or employees on the 27th day of May, 2022.
18. During and in the content of the aforesaid broadcast the Plaintiff was accused of and said to be a child molester and a person who was actually convicted of personally molesting young boys while a pastor of an area Baptist church all of which was false and without any basis. This broadcast included the Defendants posting the Plaintiff's picture on the broadcast.
19. This action and actions of the Defendants' was taken in derogation of and failure to adhere to the Defendants' own rules of verification and substantiation of the facts upon which a newscast is based in order to be the first to run a salacious story of the failure of a local religious leader.

PLAINTIFF RESPECTFULLY REQUESTS TRIAL BY JURY

Respectfully submitted,

/s/ R. Edward Massey Jr
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/s/ John D. Richardson

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Counsel for Plaintiff

**Defendant, SINCLAIR MEDIA, INC., SINCLAIR BROADCASTING,
to be served via certified mail at the following address:**

c/o Corporation Service Company Inc (registered agent)

641 South Lawrence Street

Montgomery, Alabama 36104

**Defendant, DEERFIELD MEDIA, INC. D/B/A WPMI 15,
to be served via certified mail at the following address:**

c/o Corporation Service Company Inc (registered agent)

2 North Jackson Street STE 605

Montgomery, AL 36104