

05302025SCAN0000002

WILLIAM LUNN

NUMBER: 057548 A

VERSUS

FIRST JUDICIAL DISTRICT COURT

NEXSTAR MEDIA, INC d/b/a KTAL,
DANIEL R. JOVIC SR. AND
JACQUELYN A. JOVIC

CADDO PARISH, LOUISIANA

PETITION FOR DAMAGES

NOW COMES Your Petitioner, WILLIAM "BILL" LUNN, a person of the full age of majority, and a resident of Bossier Parish, Louisiana, who, through undersigned counsel, respectfully represents as follows:

1.

Until his career was destroyed by his former competitors, Nexstar Media, Inc. d/b/a KTAL, Daniel R. Jovic, Sr. and Jacquelyn A. Jovic, Defendants herein, William "Bill" Lunn ("Lunn") was an award-winning journalist employed as news director and lead anchor at KTBS 3 Shreveport, an ABC affiliate ("KTBS").

2.

Defendants – with malice aforethought – rushed, sensational and poorly sourced lead news story on the 10 p.m. broadcast, reaching Lunn's children, friends, family, ministers, former classmates, employer, former wife, and innumerable viewers and internet users in Louisiana, parts of Arkansas and Texas, and eventually the entire world – that told everyone that Lunn was a child predator. Defendants made these claims without regard for the facts and evidence in their actual possession, or worse, ignored that Lunn was nothing more than a decent man caught up in a criminal scheme and completely innocent. Defendants' claims were, and are, false.

3.

Petitioner believes strongly in the newsgathering protections afforded journalists in the United States. He seeks to follow the rulings of the Supreme Courts (both the United States and Louisiana Supreme Courts) and relevant jurisprudence to show that Defendants' actions are a rare example of actionable defamation and character assassination. Defendants' refusal to correct, retract or place in context the false allegations only add to the need for this action and further salts the wound.

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THE DEFENDANTS

4.

Made Defendants herein are:

- A. **NEXSTAR MEDIA INC, (“Nexstar”) d/b/a KTAL NBC 6 (“KTAL”),** a Delaware Corporation licensed to do and doing business in Louisiana, with its principal business office in Irving, Texas. Nexstar is the largest owner of local television stations in the United States, operating a portfolio of more than 200 owned or partner stations affiliated with the nation’s leading broadcast networks. Its stations serve 116 markets and reach approximately 220 million viewers nationwide. Within the Shreveport-Bossier Designated Market Area (DMA), Nexstar owns and operates KTAL NBC 6, KMSS FOX 33, and KSHV 45. Nexstar/KTAL competes directly with Lunn’s former employer KTBS in this market. Nexstar will be served in accordance with the service instructions below;
- B. **DANIEL R. JOVIC SR., (“Jovic” or “Dan Jovic”),** an individual of the full age of majority and, along with his wife and Co-Defendant, Jacquelyn A. Jovic, is a domiciliary of Caddo Parish, Louisiana. Jovic is a Nexstar/KTAL employee, news anchor and reporter. He is the lead co-anchor for KTAL in the Shreveport regional market. Jovic will be served in accordance with service instructions below;
- C. **JACQUELYN A. JOVIC, (“Jacque Jovic”),** an individual of the full age of majority and, along with her husband, Co-Defendant, Dan Jovic, is a domiciliary of Caddo Parish, Louisiana. Jacque Jovic is a Nexstar/KTAL employee, news anchor and reporter. She is the lead co-anchor for KTAL in the Shreveport regional market. Jacque Jovic will be served in accordance with service instructions below.

Nexstar, Dan Jovic and Jacque Jovic may be collectively referred to as “Defendants.”

5.

Venue in this Court is proper pursuant to La. C.C.P. art. 42 and La. C.C.P. art. 74.

6.

For years, Bill Lunn and the Defendants were direct competitors – with Lunn and KTBS consistently headlining and carrying the top-rated newscast in the Shreveport/Bossier Designated Market Area. KTAL’s Dan Jovic-led newscast generally ranked behind its main competitors, KTBS and KSLA News 12. Jovic and his co-Defendants seized on the opportunity to bend the facts to their will in an attempt take out or otherwise substantially interfere with the market leader

and their direct competitor, Lunn. Lunn resigned from his job at KTBS on June 3, 2024 – hours before the Defendants aired their newscast that has – to date – ended his career in broadcast journalism.



Bill Lunn, Anchor and News Director of KTBS



Dan Jovic, Lead Anchor and Reporter for KTAL.

7.

This matter is a civil action for defamation, invasion of privacy, false light, the intentional infliction of emotional distress, violations of the Louisiana Unfair Trade Practices Act (“LUTPA”), and other tortious conduct, that has, as will be described in more detail herein and at trial, damaged Bill Lunn’s ability to ply his trade, enjoy his profession, engage in the enjoyment of his life, livelihood, build relationships and have hope for the future.

8.

The Defendants’ actions are exceptionally egregious and harmful, particularly given that the Defendants have never acknowledged, corrected, or retracted their numerous defamatory broadcasts in which they named Petitioner a child predator, despite knowing that the statements they made were either false or so reckless as to question their truth or veracity, and upon confirmation of the falsity by witnesses, the police, and common sense, the Defendants continued to praise their proclaimed “vigilantes” and have never remediated their conduct.

WHAT ACTUALLY HAPPENED

9.

On May 27, 2024, Lunn used his mobile device to log into Tinder, a dating application used by millions of adult Americans. Lunn’s personal Tinder profile reflected his real name, used a recent photo, and reflected that he was a single man in the Shreveport-Bossier area looking to meet women.

10.

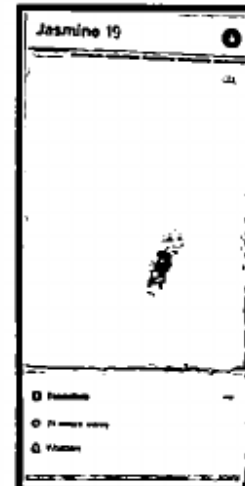
That day, the adults-only dating application¹ showed that Lunn had “interest” from a 19-year-old local woman named “Jasmine.”

11.

Soon, “Jasmine” asked Lunn to text her on her cell phone. Jasmine and Lunn told each other their backgrounds, including Lunn’s job, Jasmine’s history in the area, and Jasmine explicitly confirmed that she was 19 years old. Later, Jasmine initiated a sexually explicit exchange.



Lunn’s Tinder profile, which appeared on the June 3, 2024 broadcast.



“Jasmine’s” Tinder profile

12.

Unbeknownst to Lunn, “Jasmine” did not exist, and the individual pretending to be the 19-year-old woman that he had been text messaging later “edited” that text message to change her claimed age to 16, not 19. Her Tinder profile continued to reflect an age of 19 years old.

13.

On May 29, 2024, “Jasmine” gave Lunn an address and suggested they meet “at her home.” Once there, Lunn was led into the house by a woman he believed to be “Jasmine.”

14.

Once inside, Lunn was immediately surrounded by three men, Antonio Coleman, Kataurio Grigsby, and Cameron Kennon, and was beaten and robbed of his belongings.

¹ See, Tinder Community Guidelines, #8: “**Adults only.** You must be 18 years of age or older to use Tinder. This also means we don’t allow photos of unaccompanied or unclothed minors, including photos of your younger self—no matter how adorable you were back then.” <https://policies.tinder.com/community-guidelines/intl/en/>.

15.

Somehow, Lunn broke free and ran out of the house, yelling for help. Hearing Lunn's pleas for help, a neighbor called 911. Another Samaritan allowed Lunn to use his phone and call 911. Lunn, bleeding, specifically described the violent incident to the 911 dispatcher.

16.

Lunn waited and relayed the same story to the Shreveport Police Department (SPD). That he was there to meet a woman he had met online, Jasmine, but that a female friend of Coleman, Kennon, and Grigsby had lured him into the house. There, he was violently attacked and robbed. SPD questioned Coleman, who lived at the address "Jasmine" had given Lunn, and Laura Robinson, the woman who had lured him into the house.

17.

Lunn sat in the back of an SPD squad car – with his door open, his hands free (not handcuffed) and was never under arrest. SPD. Cpl. Allen retrieved Lunn's phone, keys, credit cards and driver's license from his assailants. Lunn showed the police officer the messages on his phone and voluntarily gave SPD his cell phone for SPD to perform a forensic analysis. It was at this point that Lunn saw that the text message from "Jasmine" stating her age had been edited.

18.

As a cooperative, known and trusted victim, Lunn was not prohibited from leaving and did leave the scene on his own free will. Lunn was not ticketed, admonished, or charged with any crime. He immediately reported these events to his family, friends, and his employer.

DEFENDANTS "INVESTIGATE"

19.

On the afternoon of Saturday, June 1, 2024, Defendant Jovic sent a text to a SPD source asking about whether Lunn was caught with a 14-year-old girl and ran from the police.²

² See Exhibit "1", Affidavit of Cpl. Bordelon Affidavit and accompanying exhibits, including screenshots of text messages between he and Dan Jovic transmitted during the June 1, 2024-June 12, 2024 time period.

20.

On the morning of June 3, 2024, SPD told Jovic that an investigation was ongoing, that Lunn had not run from authorities as Jovic suggested, and that no arrests had been made.³

21.

After obtaining and reviewing more information about the incident, Jovic rushed, with a KTAL camera crew, to find and interview Coleman, Grigsby, and Kennon.

22.

After meeting them, Jovic engaged in leading and calculated questioning eventually eliciting some “facts” that, despite the source and Jovic’s own training and knowledge as to their questionable truth or veracity, culminated in the false broadcast that derailed Lunn’s career, destroyed his mental health, impugned his credibility in the community, and damaged his family forever.

23.

Jovic, interviewed Coleman, Grigsby and Kennon on camera for the evening news – just hours away. Jovic’s camera video recorded Coleman showing his phone screen at various times. Coleman demonstrated for Jovic (and the camera) the entire ruse, “Jasmine’s” Tinder account, her fake text messages with Lunn, and even explicit texts “Jasmine” sent Lunn to lure him to a trap.

24.

Upon information and belief, Coleman told Jovic he used the “MeetMe” app to lure Lunn—despite showing the Tinder app and no evidence Lunn had a MeetMe account. While Tinder does not allow underage accounts and has stringent requirements to combat underage use, at the time of Jovic’s interview, MeetMe allowed anyone 13 or over to join and “meet.”

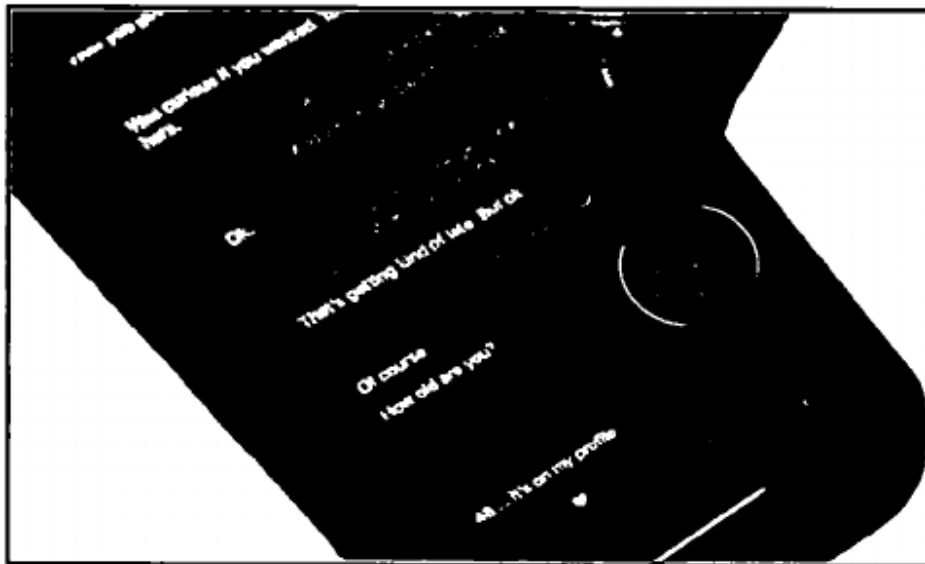
25.

Footage shows Jovic reviewed the text message between Coleman (as “Jasmine”) and Lunn, in which Coleman (“Jasmine”) edited a previous message about Jasmine’s age.

³ *Id.*

26.

During his review of the communications between Coleman, posing as “Jasmine” and Lunn, Jovic found no evidence that Lunn was seeking to have sex with a minor. As reflected below, the only evidence suggesting that “Jasmine” was a minor was a text message that was clearly marked as “edited,” and which showed it had been changed from “I’m 19” to “I’m 16.”



(Above): Image of Coleman’s phone taken during Jovic’s June 3, 2024, interview with Coleman and his co-participants. See Exhibit “1”, “Bordelon Ex. 3”, at pg. 011 (red circle added for emphasis). (Below): Lunn’s phone text messages with Jasmine as edited, attached hereto as Exhibit “2.”



27.

On June 3, 2024, Lunn, aware that he may cause embarrassment to his employer and after discussing the matter with his superiors, resigned from KTBS, with the intention and hope to return to work once the facts cleared his name.

28.

It was not until his cellphone was returned to him by the SPD in March of 2025 that Lunn learned that Jovic had known all along that the text message had been edited, the actual situation

which had occurred, and that the Defendants had taken their best shot: using reckless falsities to destroy a leading newsman employed by their biggest market competitor.

29.

During Defendants' interview with those highly questionable and dubious sources, Jovic encouraged Coleman to spin his tale. Coleman obliged: claiming he was a "child predator hunter" supported by local authorities like the District Attorney. Coleman also claimed that he and his co-participants had "caught" 10 men over the past three weeks through their "vigilante" efforts.

30.

Defendants, led by Jovic, suspended all critical analysis, assessment, and logic in service of an unbelievable story from three young men who had admitted to deception and criminal activity. Despite his extensive and decorated experience as a reporter, upon information and belief, Jovic did not challenge the source, report on the existence of an edited text message, or contact the local authorities to determine the credibility of any of these claims. Instead, he rushed to the newsroom to edit and package the hit piece (in mere hours) to take out a longtime competitor.

31.

Two of Jovic's depicted heroes, Coleman and Grigsby – the Defendants claimed they were "vigilantes" seeking "justice" – were soon arrested for nearly identical, brutal and violent crimes inflicted on other victims: including "rich guys" on dating apps who were lured, beaten and robbed.

32.

Coleman and Grigsby were arrested on June 7, 2024, in Caddo Parish, and on July 31, 2024, in Bossier Parish and await their trials on felony charges including Armed Robbery, Second Degree Robbery, Second Degree Battery, Aggravated Second Degree Battery, False Imprisonment, and Felony Access Device Fraud. The charges reflect strikingly similar criminal activities.

THE JUNE 3, 2024 NEWSCAST

33.

Just a few hours after Jovic's hurried, deferential and unchallenged interview with Lunn's assailants, Defendants prepared to air the story on their 10 p.m. newscast (hereinafter, "the Newscast"). Anchoring were the husband-and-wife duo of Dan and Jacque Jovic.

34.

Nexstar and Dan Jovic's superiors at KTAL failed to vet, edit, or confirm the allegations against Lunn in the report.

35.

With gusto, the Jovics led the 10 p.m. news with the rushed, reckless, false, and defamatory story about Lunn. The Newscast featured footage interviewing three men, Coleman, Grigsby, and Kennon, who admitted that they had committed crimes in attacking Lunn.

36.

The broadcast was meant to shock and titillate, with the damage including the demise of a prominent market competitor. The Defendants showed no regard for the truth, Lunn's reputation, or his family, and instead relied on an interview conducted with a wholesale lack of diligence.

37.

In the Newscast and its subsequent video and written story distributed online, the defendants lied, misrepresented, and ignored the evidence in their possession and promoted the incident as an "explosive" story about Lunn being "caught" attempting to sexually engage with a 15-year-old child,⁴ until he was brutally beaten by three concerned citizens.

38.

The text messages between Lunn and "Jasmine" were in the Defendants' possession – and even a novice reporter would have questioned Coleman's story, his motivation, or subjected them to any questioning about the story and its characters.

39.

As a single man, Lunn was not concerned about using a dating app to meet women. Despite the actual facts of the action, the Defendants reported that Lunn was on a "new" social media app called "MeetMe" – despite their own literal possession of Lunn's Tinder profile and the text messages between Lunn and "Jasmine." Defendants falsely reported to the world that Lunn sought to meet a 15-year-old girl until the "vigilantes" stopped him.

⁴ In the Newscast, Coleman tells Jovic that he told Lunn (by text) that "Jasmine" was 15 years old. The actual edited text message reflects that Coleman's edited text message stated, "I'm 16."

40.

The age of 15 was fabricated. The edited text message, the Tinder profile, and more were in Defendants' knowledge and possession before, during, and after the Newscast.

41.

For the Newscast, Defendants further staged a video recording of Jovic calling Lunn's cell phone for comment. Jovic's false representations were undermined by his personal knowledge that Lunn's cellphone was in SPD custody, and that Lunn could not answer the call.

42.

Defendants allowed the Newscast to air, approved the story script, and "teased"⁵ that it would be airing on the 10 p.m.

43.

At 9:50 p.m. on June 3, 2024, while boasting to Shreveport Police Cpl. Bordelon, Jovic shamelessly plugged his upcoming story by texting the following:

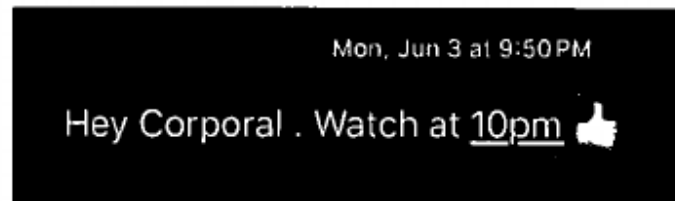


Exhibit "1", "Bordelon Ex. 1", at pg. 002.

44.

Defendants made these false allegations against Lunn, because it served their contrived and self-serving narrative. On information and belief, the evidence will show the Defendants focused on the damage to Lunn and explosiveness (viewership) of the story, not accuracy.

45.

The Newscast claimed that the investigation was "sparked due to the efforts of three local men who say they've made it their mission to catch men trying to have sex with underage girls."⁶

⁵ In the broadcast industry, a "tease" tells viewers to stay tuned for an upcoming newscast to follow shortly.

⁶ See **Exhibit "3"**, a certified transcript of the June 3, 2024 Newscast, at p. 2. Dan Jovic, *Local "predator hunters" spark SPD investigation into former KTBS news anchor Bill Lunn*, KTAL NEWS COM (June 4, 2024, updated 8:42 AM), <https://www.ktalnews.com/news/local-news/local-predator-hunters-spark-spd-investigation-into-former-ktbs-news-anchor-bill-lunn/>.

46.

Despite their brutal, illegal actions, Jovic gushed that Coleman, Griggs and Kennon were “self-described predator hunters,” reporting, without any evidence, that “for a little over three weeks they have been pretending to be an underaged girl online in an effort to catfish⁷ local men who are allegedly trying to meet up for sex.”⁸

47.

Defendants failed to probe Coleman and his co-participants, review relevant public records, or ask any official source, to corroborate Coleman’s representations that they were fighting an epidemic of child predators in the Shreveport-Bossier area.

48.

During the eight-hour sprint, Defendants repeatedly ignored and recklessly failed to exercise even a modicum of diligence. To wit: Defendants failed to follow up on the capture of 10 – ten – child predators in the area in under a month. In May 2025, fellow Nexstar station WGNO-New Orleans celebrated the FBI’s arrests of just four – 4 – child predators across the state.⁹

49.

The 10 p.m. hour came, and the Newscast was aired on KTAL, a major regional station, but also sent into the worldwide ether. It was subsequently published to KTAL 6’s Website, YouTube Channel and social media, amplifying its reach and public impact. Below are screen captures of the Newscast that track with the transcript of same:¹⁰

DAN: Tonight, we are sharing an explosive report claiming a local news anchor, who also served as the organization’s news director, is the subject of an on-going investigation by Shreveport police. Good evening, I’m Dan Jovic.

JACQUE: And I’m Jacque Jovic. The investigation was sparked due to the efforts of three local men who say they’ve made it their mission to catch men trying to have sex with underage girls.

⁷ In the 21st century, “catfish” or “catfishing” has come to mean deceiving someone online by creating a fake persona.

⁸ See Exhibit “3”, at pp. 2-3.

⁹ Marlo Lacen, *Four alleged child predators arrested in federal operation, FBI says*, WGNO-TV (May 7, 2025, 3:37 PM), <https://www.wgno.com> (select “News” from dropdown; then select “Local”; then search in search bar for “Four alleged child predators”; then click “Four alleged child predators arrested in federal operation, FBI says”).

¹⁰ See Exhibit “3”.



DAN: They've showed us the evidence they have provided to police and share a firsthand account of what they say unfolded that day. It's our top story. *(video begins)*

ANTONIO COLEMAN: What we do, is like we catch child predators.

DAN: Antonio Coleman, Kameron Kennon, and Kataurio Grigsby are self-described predator hunters. For a little over three weeks, they've been pretending to be an underage girl online in an effort to catfish local men who are allegedly trying to meet up for sex.



KAMERON KENNON: "It's just this how fast they are willing to meet young females. It's crazy."

DAN: The trio says they were surprised by their efforts last Wednesday, May 29. That day Shreveport police received a call at 11:04 a.m. The call came from former KTBS news anchor Bill Lunn, according to police and a call for service report obtained by NBC 6, Lunn claimed he was the victim of an assault and battery but a case report on the alleged incident paints a different story. According to the case report, the alleged offense is not for assault and battery, rather for computer aided solicitation for sexual purposes. These three men are the reason why.



ANTONIO COLEMAN: "As soon as he seen us, he just darted out."

DAN: They created a fake MeetMe profile, that profile is of an underage girl. They say they then wait for men to like the profile and spark a conversation. They say Lunn initiated a conversation Tuesday night.

ANTONIO COLEMAN: They had a little conversation going on and he asked how old she was, the girl told him she was 15 years old.



DAN: Antonio says he was actually the girl. He says he and Lunn exchanged dozens upon dozens of text messages over the next several hours where the conversation quickly turned to sex.

ANTONIO COLEMAN: He was like sending pictures to her. He was saying, like, he wanted to do this to her. Explicit things that I can't say on camera.

DAN: Antonio checked the phone number he was texting with. It was the same number Lunn lists on his LinkedIn profile.

ANTONIO COLEMAN: I'm like, oh my God. So, I looked to his Facebook. This is really his number. This is really Bill Lunn. And it was just really crazy.



DAN: We were shown images in the text message chain, displaying sexually explicit photos that Lunn allegedly sent of himself. Antonio says Lunn set up a meeting date last Wednesday.

ANTONIO COLEMAN: He came on his lunch break from work to come meet her.

DAN: According to Antonio, when Lunn arrived at their designated meeting spot the trio jumped out informing him of what was happening.

ANTONIO COLEMAN: You could see the guilt in his eyes. He knew like, oh I'm done.

DAN: They say Lunn ran and later called police saying he was a victim of an assault and battery. The 3 men waited for police to arrive; they say hours of questioning followed. The call for service report shows police spent four hours and 21 minutes at the scene. The young men say Lunn was handcuffed in the back of a police vehicle for hours. All parties were released from the scene with no charges filed. Shreveport police told me there is an active investigation into Lunn based on the events of that day. I tried reaching out to Lunn to get his side of the story.

BILL LUNN VOICE MAIL GREETING: Please leave your name and number and I will get back to you as soon as possible.

DAN: "Bill this is Dan Jovic calling from NBC 6 news trying to get your side of the story related to an incident that took place last week."

DAN: My call went unanswered and was not returned.



KATAURIO GRIGSBY: The thing is as Bill was running off, he yells I have a wife and kids. I'm sitting there, as he's running off, I'm thinking in my head, how can you say that when you literally just walked yourself in that house expecting to meet an underage teenager which he was going to do it regardless.



DAN: Lunn resigned Monday from both of his roles at KTBS. Lunn's profile was immediately scrubbed from the station's website. Calls to KTBS management regarding to the incident have gone unanswered. Antonio, Kameron, and Kataurio say they have allegedly caught 10 men in the span of just three weeks through their vigilante efforts.

Exhibit "3" (still images from newscast embedded).¹¹

50.

Defendants further sensationalized the narrative by broadcasting a blurred picture of Lunn's private area, one of the explicit photos Lunn sent back to "Jasmine" and also published Lunn's Tinder profile picture.

51.

On June 5, 2024, the Defendants published a follow-up story linked to the June 4, 2024, Newscast further lauding Coleman, Grigsby and Kennon as heroes dedicated to catching child predators, who had teamed up to create their own task force to protect underage girls.¹² In the June

¹¹ The Newscast referenced above, and as transcribed in Exhibit "3" was also posted to YouTube, same of which is attached hereto via Thumb Drive as Exhibit "4", and is still active at <https://www.youtube.com/watch?v=tG7FLau5M9Q>.

¹² Marlo Lacen & Ya'Lisha Gatewood, 'Predator hunters': Mind-boggled by number of men seeking sex with minors, KTAL news com (June 5, 2024, 11:43 AM), <https://www.ktalnews.com> (select "News" from dropdown; then select "Local"; then search in search bar for "predator hunters"; then click "'Predator hunters': Mind-boggled by number of men seeking sex with minors").

5, 2024, story, the Defendants showed two separate images of stacks of files. These files were fake: props staged by the Defendants to add credibility to their defamatory statement and false narrative.

52.

In the Newscast, Jovic reported numerous falsities, including, but not limited to:

- a. The existence of Jasmine;
- b. Lunn and “Jasmine” met on MeetMe, and that “Jasmine” was an “underage girl;”
- c. Lunn initiated a conversation with “Jasmine” on MeetMe;
- d. Lunn had a MeetMe account;
- e. “Jasmine” had told Lunn she was a minor, and either 16 or 15-years-old;
- f. Lunn purposefully walked into Coleman’s house to meet a 15-year-old girl to engage in some sort of illicit relations;
- g. Lunn was handcuffed in a Shreveport Police vehicle and detained; and,
- h. Despite a staged call Lunn could not answer, that Lunn would not tell his “side of the story.”

THE AFTERMATH

53.

After the Newscast, the story went “viral,” from MSNBC to the New York Post, embedding into the public’s mind that Lunn was a child predator. As a result, Lunn was threatened with vulgar and terrifying threats which continue to this day based on the Defendants’ false reporting.

54.

On June 5, 2024, still celebrating the “vigilante” efforts of Coleman, Grigsby, and Kennon, Defendants released a follow-up story, claiming the “heroes” were after men like Lunn — who they again named a child predator — and after “men who ... try to have sex with underage girls,” who commit “juvenile sex crimes,” and to “help somebody else keep their daughter.”¹³

55.

On June 6, 2024, at 11:43 a.m., in response to an update request from Jovic, Cpl. Bordelon responded there were “actually some issues” in proving “that Lunn knew the girl was a juvenile.”

¹³ See note 12, *supra*.

56.

Less than three minutes later, Jovic shot back an image of the precise moment in Defendants' June 3 interview footage where Coleman, acting as "Jasmine," had clearly edited the text message in which she told Lunn her age.



Exhibit "1", "Bordelon Ex. 1," at pg. 006.

57.

The next day, June 7, 2024, Grigsby and Coleman falsely lured, beat, and robbed another man as part of their criminal enterprise, catfishing scheme.

58.

On or about June 8, 2024, Coleman and Grigsby were arrested on felony charges. Including multiple felony counts relating to their "vigilante" scheme.

59.

Defendants failed to probe why the "vigilantes" were arrested a few days later, focusing on the "vigilante angle" and again failed to contact the June 7th victim.

60.

After posting bond from the June 8, 2024, arrest, on July 21, 2024, Grigsby and Coleman resumed their criminal enterprise in Bossier Parish and allegedly lured, attacked and kidnapped a man in Bossier Parish, extorting \$600 from a friend of the victim before they released the victim.

61.

Three days later, July 24, 2024, Coleman and Grigsby and a female accomplice allegedly lured a victim into a public bathroom in Bossier City, stripped a man of his clothes, beat, shot, and robbed him causing him to walk naked for help.

62.

Despite KTAL's air coverage celebrating these men as vigilantes, there is no evidence that they ever delivered any criminals or prospective criminals to law enforcement.

63.

Between July 31, 2024, and September 9, 2024, Coleman and Grigsby were arrested multiple times for the crimes they committed, including the May 29, June 7, July 21, and July 24, 2024, "vigilante" events: KTAL News 6 chose not to report on the charges, which include kidnapping, battery, robbery and unauthorized use of internet and credit cards.

64.

On August 14, 2024, KTAL aired an inadequate update that did not meaningfully address—the damage caused by the original story.¹⁴ In that broadcast, Jovic again falsely presented the "Jasmine" edited age text as newly uncovered, explosive information—despite having it in his possession since June 3, 2024.

65.

In summary, Defendants continued to exacerbate the damage on Lunn by perpetuating the lies, featuring stories about the vigilantes and Lunn (some of which occurred even after Coleman and Grigsby had been arrested for similar criminal schemes). KTAL published and broadcast including but not limited to the following about Lunn and the vigilantes:

- a. June 4, 2024, 12:00 a.m.: Local "predator hunters" spark Shreveport police investigation into former KTBS news anchor¹⁵
- b. June 4, 2024, 7:44 p.m.: Shreveport police warns against vigilantism¹⁶

¹⁴ Dan Jovic, *Former KTBS news anchor Bill Lunn cleared in SPD's computer solicitation of a minor investigation*, KTAL NEWS COM (Aug. 14, 2024, 8:23 PM), <https://www.ktalnews.com> (select "News" from dropdown; then select "Local"; then search in search bar for "Bill Lunn"; then click "Former KTBS news anchor Bill Lunn cleared in SPD's computer solicitation of a minor investigation").

¹⁵ See Exhibit "3" and Exhibit "4".

¹⁶ Mya Nicholson, *Shreveport police against vigilante sting operations*, KTAL NEWS COM (June 4, 2024, updated June 5, 2024, 10:47 AM), <https://www.ktalnews.com> (select "News" from dropdown; then select

- c. June 5, 2024 11:37 a.m. - Attorney for former Shreveport news anchor 'vehemently denies' allegations raised by local predator hunters¹⁷
- d. June 5, 2024 11:43 a.m. - Number of men willing to have sexually explicit communication with minors 'mind boggling', local predator hunters say¹⁸
- e. June 13, 2024 6:06 p.m. - Local 'predator hunters' arrested after alleged fight¹⁹
- f. August 14, 2024 8:23 p.m. - Police investigation clears former Shreveport news anchor Bill Lunn²⁰

66.

Following forensic analysis by the Shreveport Police Department, on March 12, 2025, Lunn's cell phone was returned to him. As described *supra*, upon receipt of cellphone, Lunn realized the text had been edited: a fact that Jovic had known (and failed to report) on June 3, 2024.

67.

Defendants' false, malicious and misleading reporting, when viewed objectively, involved an extreme degree of risk, considering the probability and magnitude of the potential harm to Lunn; and of which Jovic and KTAL had actual, subjective awareness of the risk involved, but nevertheless proceeded with conscious indifference to the rights, safety, or welfare of Lunn.

"Local"; then search in search bar for "Vigilante sting"; then click "Shreveport police against vigilante sting operations").

¹⁷ Isabella Cheng, *Former news anchor 'vehemently denies' child predator allegations*, KTAL news com (June 5, 2024, 11:37 AM), <https://www.ktalnews.com> (select "News" from dropdown; then select "Local"; then search in search bar for "Bill Lunn"; then click "Former news anchor 'vehemently denies' child predator allegations").

¹⁸ See note 12, *supra*.

¹⁹ Dan Jovic & Matthew Stephens, *Local 'predator hunters' arrested after alleged fight*, KTAL NEWS COM (June 13, 2024, updated June 17, 2024, 8:39 AM), <https://www.ktalnews.com> (select "News" from dropdown; then select "Local"; then search in search bar for "predator hunters"; then click "Local 'predator hunters' arrested after alleged fight").

²⁰ Dan Jovic, *Former KTBS news anchor Bill Lunn cleared in SPD's computer solicitation of a minor investigation*, KTAL NEWS COM (Aug. 14, 2024, 8:23 PM), <https://www.ktalnews.com> (select "News" from dropdown; then select "Local"; then search in search bar for "Bill Lunn"; then click "Former KTBS news anchor Bill Lunn cleared in SPD's computer solicitation of a minor investigation").

68.

Despite requests, Defendants have not corrected, retracted, or clarified the falsities published about Lunn. Nor have they acknowledged any error at all. As illustrated in **Exhibit "5"** and reproduced below, on March 12, 2025, in response to Lunn's attorney presenting Nexstar with the damning evidence above, including the demonstrable falsity, error and animus, Defendants' counsel stated:

Good Afternoon Mr. Gatti,

Thank you for your recent communications.

Nexstar stands by the journalist and the stories as presented.

Best,
Christine Reilly

Christine Reilly
Vice President & Associate General Counsel
Nexstar Media Inc.
545 E. John Carpenter Freeway, Suite 700
Irving, TX 75062

Exhibit "5".

DAMAGES

69.

The Defendants' reckless indifference including the additional indignity of the Defendants' refusal to acknowledge or correct their error, has devastated Lunn. He has suffered from depression and suicidal ideation for which he has sought mental health treatment. Due to the acts and omissions of the Defendants, Lunn will suffer lifelong physical and mental health conditions.

70.

He has sustained severe reputational damage. He has lost the love and affection of his family and friends, as well as the respect of his colleagues. It will take years, if not decades, to rehabilitate his personal and professional reputation, if ever.

71.

Before the Newscast, Lunn was an Emmy award-winning journalist, author, non-profit founder, and the news director at the top-rated news station in the area in the Shreveport Broadcast Area. Today, he is working as a manual laborer for a friend's Christian-oriented moving company.

72.

Lunn is a 1993 graduate of the Northwestern University Medill School of Journalism. Despite his credentials, Lunn has been unsuccessful in obtaining any job in journalism despite multiple attempts to do so. Nor has Lunn been able to return to any KTBS position.

73.

Lunn has a thirty-year history in Journalism, including more than 20 years working as a news anchor in Memphis, an award-winning career in Minneapolis-St. Paul, and numerous high-profile accomplishments. Highlights including an election night 2000 interview of vanquished candidate Al Gore, and a stint covering the Clinton impeachment hearings. He was cast as the reporter in John Grisham's hit movie *The Rainmaker*, reporting the verdict at the end of the movie.



74.

Lunn is a published author, interviewing numerous individuals and publishing a 360-page biography - *Heart of a Ranger*, about an Army special operator killed in Afghanistan. Lunn was awarded the state of Minnesota's highest civilian military award. Lunn has emceed the Congressional Medal of Honor National Convention.

75.

At KTBS-TV, Lunn earned respect and trust of the community. He was promoted to news director, responsible for a \$2 million dollar budget supervising more than 40 employees. In 2023, the Louisiana Association of Broadcasters gave Lunn the "Best Series or Documentary" award for his KTBS report, "Butterfly Man."²¹

²¹ KTBS+ 3, *KTBS 3 honored at Louisiana Association of Broadcasters awards luncheon*, (Mar. 24, 2023, 11:43 AM), <https://www.ktbs.com> (select "News" from dropdown; then search in search bar for "KTBS honored at Louisiana Association"); then click "KTBS 3 honored at Louisiana Association of Broadcasters awards luncheon"); Bill Lunn, *The Butterfly Man: 1934 crime that stunned Shreveport*, KTBS TV (Sep. 1, 2022), <https://www.ktbs.com> (select "News" from dropdown; then search in search bar for "The Butterfly Man"; then click "The Butterfly Man: 1934 crime that stunned Shreveport").

76.

Lunn was well-known for “Bill’s Bikes,” working to refurbish bikes and for children in need. Since 2021, Lunn has provided 500 bikes to children in the Shreveport community.

77.

As a result of Defendants’ tortious and malicious actions, Lunn has not been able to return to broadcasting, despite applications and interviews with other news outlets—and even a Nexstar station. Once a prospective employer connects him to the Newscast, Lunn is excluded from the candidate pool.

78.

As a direct result of the defamatory attack and the defendant’s failure to correct or retract, Lunn has suffered the following injuries and losses:

1. Past, present and future mental pain and suffering;
2. Past, present and future physical injuries and suffering;
3. Past, present and future public humiliation and reputational damage;
4. Past, present and future damage to family relationships;
5. Past, present and future lost income;
6. Past, present and future loss of employment opportunities;
7. Loss of past and future earnings and employment related benefits;
8. Loss of enjoyment of life; and,
9. Any other harms and losses to be shown at trial in this matter.

79.

The harm caused by Defendants’ false reporting extends well beyond the Ark-La-Tex viewing area. Numerous national and local media outlets picked up KTAL’s false reporting and repeated it verbatim, including:

- a. The New York Post, which republished and referenced the KTAL reporting in its story, which garnered 377 comments from readers.²²

²² Emily Crane, *Louisiana TV anchor resigns after he was allegedly sexting 15-year-old girl – who turned out to be vigilante ‘predator hunters’*, NY POST (June 5, 2024, 2:15 PM), <https://www.nypost.com> (select “US News” from dropdown; then search in search bar for “Louisiana TV anchor resigns”; then click “Louisiana TV anchor resigns after he was allegedly sexting 15-year-old girl – who turned out to be vigilante ‘predator hunters’”).

- b. Yahoo.com, with more than 700 million visitors a month, republished and referenced the KTAL story.²³
- c. MSN.com republished the story and referenced Lunn.²⁴
- d. WKRG.com is a news site owned by Nexstar affiliate WKRG covering the area Mobile, Alabama and Pensacola, Florida viewing area. It republished the June 4, 2024, video and story.²⁵
- e. Fox 26 Houston with over 615,000 subscribers on YouTube, featured the KTAL story and even interviewed constables in the Houston area who remarked "...with the news anchor, a criminal case can be made" – directly reinforcing the defamatory claims Defendants made.²⁶
- f. KTVE in Monroe, LA., a Nexstar affiliate, which also operates Myarklamiss.com and linked the story.²⁷
- g. The Daily Mail, with 2.8 million followers on X, 22 million followers on Facebook, and millions of subscribers on Instagram, YouTube and TikTok, republished and referenced the KTAL-TV story.²⁸
- h. 96.5 KPEL, a Lafayette, Louisiana news radio station repeated the false statement that KTAL had reported Lunn was meeting a 15-year-old girl on its website, www.kpel965.com.²⁹
- i. KEEL710 Shreveport Radio repeated verbatim the allegations of the KTAL story.³⁰

²³ Local "predator hunters" spark SPD investigation into former KTBS news anchor, Bill Lunn, YAHOO NEWS (June 3, 2024, 11:35 PM), <https://www.news.yahoo.com> (search in search bar for "Local predator hunters spark SPD"; then click "Local 'predator hunters' spark SPD investigation into former KTBS news anchor, Bill Lunn").

²⁴ Dan Jovic, Local "predator hunters" spark SPD investigation into former KTBS news anchor Bill Lunn, MSN (last visited May 28, 2025), <https://www.msn.com> (select "News" from dropdown; then select "Local" from dropdown; then select "KTAL Shreveport"; then click "Local 'predator hunters' spark SPD investigation into former KTBS news anchor Bill Lunn").

²⁵ Dan Jovic, Local "predator hunters" spark SPD investigation into former KTBS news anchor Bill Lunn, WKRG-TV (June 4, 2024, 10:25 PM), <https://www.wkrg.com> (select "News" from dropdown; then select "Local News" from dropdown; then search in search bar for "Local predator hunters spark SPD"; then click "Local 'predator hunters' spark SPD investigation into former KTBS news anchor, Bill Lunn").

²⁶ Isiah Carey, News Director suspected of soliciting sex from teen after undercover civilian-led sex sting, KRIV FOX 26 HOUSTON (June 11, 2024, 11:19 PM), <https://www.fox26houston.com> (select "News" from dropdown; then search in search bar for "News Director suspected of soliciting sex"; then click "News Director suspected of soliciting sex from teen after undercover civilian-led sex sting").

²⁷ Local "Predator hunters" spark SPD investigation into former KTBS news anchor, Bill Lunn, KTVE (June 3, 2024, 11:35 PM), <https://www.myarklamiss.com/video/local-predator-hunters-spark-spd-investigation-into-former-ktbs-news-anchor-bill-lunn/9753049/>.

²⁸ Bethan Sexton, Married TV news anchor is accused of sexting underage girl and arranging to meet – but was stunned to find out who he was actually messaging, DAILY MAIL (June 5, 2024, updated June 5, 2024, 11:11 PM), <https://www.dailymail.co.uk/news/article-13497617/louisiana-news-anchor-bill-lunn-accused-sexting-underage-girl.html>.

²⁹ Bernadette Lee, Update: Louisiana TV Anchor Quits Amid Possible Inappropriate Communication with a Juvenile, KPEL-FM (June 5, 2024), <https://www.kpel965.com> (search in search bar for "Louisiana TV Anchor Quits"; then click "Update: Louisiana TV Anchor Quits Amid Possible Inappropriate Communication with a Juvenile").

³⁰ Erin McCarty, Shreveport TV News Anchor Being Investigated by SPD, KEEL (June 4, 2025), <https://710keel.com> (search in search bar for "Shreveport TV News Anchor Being Investigated"; then click "Shreveport TV News Anchor Being Investigated by SPD").

- j. KLFY, a Nexstar station in Lafayette, Louisiana, republished the story and video.³¹
- k. WGNO in New Orleans, a Nexstar station, shared and republished the original Newscast.³²
- l. CBS42, a Nexstar station in Birmingham, Alabama, shared and republished the original newscast.³³
- m. WJTV.com / WJTV Jackson, Mississippi, a Nexstar station republished the Newscast that remains online.³⁴

80.

The false and defamatory statements made by Defendants, and foreseeably republished as demonstrated above, created a lasting and irreversible perception, seared into public consciousness, playing into the public's deep-seated animosity toward child predators, which has now been permanently and wrongfully directed at Lunn. For example, on May 20, 2024 – weeks before the Newscast – Lunn posted on his Facebook about the anniversary of a school shooting. After the Newscast, the comments in that same post, filled with insults and threats fueled by the false reporting from the Defendants.

81.

The enduring and permanent reputational harm holds significant implications. Lunn, unable to find work as a broadcaster anywhere in this country, currently works at Christ Fit Gym Recycling and with Strongmen Movers. He is a member of a team that moves residential and commercial moving projects and makes approximately \$20 an hour.

³¹ Dan Jovic, *Local "predator hunters" spark SPD investigation into former Shreveport news anchor*, KLFY-TV (June 4, 2024, updated June 4, 2024, 11:20 AM), <https://www.klfy.com> (select "News" from dropdown; then select "Local News" from dropdown; then search in search bar for "predator hunters"; then click "Local "predator hunters" spark SPD investigation into former Shreveport news anchor").

³² Dan Jovic, *Local "predator hunters" spark SPD investigation into former KTBS news anchor Bill Lunn*, WGNO (June 4, 2024, updated June 4, 2024, 12:04 PM), <https://www.wgno.com> (select "News" from dropdown; then select "Local News" from dropdown; then search in search bar for "Local predator hunters spark SPD"; then click "Local "predator hunters" spark SPD investigation into former KTBS news anchor Bill Lunn").

³³ Dan Jovic, *'Predator hunters' spark SPD investigation into former Louisiana TV anchor Bill Lunn*, CBS 42 (WJAT-TV) (June 4, 2024, updated June 4, 2024, 11:18 AM), <https://www.cbs42.com> (select "News" from dropdown; then select "Local News" from dropdown; then search in search bar for "predator hunters"; then click "'Predator hunters' spark SPD investigation into former Louisiana TV anchor Bill Lunn").

³⁴ Dan Jovic, *Local "Predator hunters" spark SPD investigation into former KTBS news anchor Bill Lunn*, WJTV (June 4, 2024, 11:10 AM), <https://www.wjtv.com> (select "News" from dropdown; then select "Local News" from dropdown; then search in search bar for "predator hunters"; then click "Local 'predator hunters' spark SPD investigation into former KTBS news anchor Bill Lunn").

DEFAMATION

82.

The allegations contained in Paragraphs 1-81 are realleged and incorporated as if fully reproduced hereinbelow.

83.

While the Newscast did contain a modicum of truth—that Lunn was “under investigation” in connection with a 911 call made on May 29, 2024—the Newscast went far beyond reporting the fact of the investigation, and Defendants took it upon themselves to elaborate, relying on unreliable sources, uncorroborated accounts, and blatantly demonstrably false statements into the story.

84.

The Newscast was replete with false statements and allegations of criminal activity, with Defendants identifying and characterizing Lunn as a child predator and pedophile, while crediting, believing and extoling the violent actions of Coleman, Grigsby, and Kennon. As described above, these statements were demonstrably false, and Defendants know or should reasonably have known of their falsity at the time of publication.

85.

The false statements made by Defendants about Lunn were published in a feature story, that was not “live”, but rather scripted and edited, and not during a live segment or on-air interview.

86.

Jovic personally reviewed Coleman’s phone, including the full Tinder conversation, message history, photos, and all installed applications. The Tinder profile clearly showed the age of “Jasmine” as 19, and there was no reference to MeetMe or any other dating platform. The only indicia of “underage” was in a single text message, which was clearly marked “edited”. Jovic filmed this, saw it, and later disseminated a screen shot of it. Defendants either saw the “edited” icon and chose not to investigate or inquire further or viewed what had been “edited” (changing “I’m 19” to “I’m 16”), and published the story anyway without any reference to the edit. Jovic knew that Lunn’s phone was in police custody when he filmed himself trying to call him and

included that footage in the June 3, 2024 Newscast. These were not errors in judgment—they were **knowingly false affirmations** of a fabricated narrative. Defendants' decision to ignore the truth they possessed, and instead publish a damning lie to the public, constitutes clear and convincing evidence of **actual malice** and **intentional defamation**.

87.

Defendants understood and intended for the June 3, 2024, Newscast to paint Lunn as a child predator and pedophile and knew that the public and the viewers of the Newscast would understand and perceive Lunn to be a child predator, pedophile and criminal. In fact, as demonstrated by a representative sample of social media posts and comments, the public *did* in fact believe that Lunn was a child predator, pedophile and a criminal, regardless of the oft-repeated, but ultimately meaningless use of the word “allegedly.” See **Exhibit “6”** exemplar public comments.

88.

Defendants falsely reported that Lunn was a child predator attempting to meet a 15-year-old girl, an absolutely false claim made with reckless disregard for the truth. This falsity was repeated multiple times and became the bedrock by which multiple follow-up stories and a narrative about Lunn were crafted. This conduct was reckless and far exceeds the bounds of decency and is utterly intolerable in a civilized community.

89.

As described *supra*, Lunn has been irrevocably damaged by Defendant's conduct, and is entitled to recover damages as a result thereof.

FALSE LIGHT

90.

The allegations contained in Paragraphs 1-89 are realleged and incorporated as if fully reproduced hereinbelow.

91.

In late May 2024, Lunn was engaging in online dating and seeking companionship with an adult female.

92.

The actions of Defendants and publication of the June 3, 2024, Newscast and subsequent reporting on Lunn dragged Lunn's private, personal life into the public eye, for which he had a reasonable expectation of privacy.

93.

Defendants' decision to feature Lunn's private life, relying on sources they knew to be un-credible, publishing information they knew to be false, further "sensationalizing" the matter by publishing graphic, blurred out images of Lunn, and characterizing Lunn's behavior as criminal and pedophilic, were blatantly unreasonable and embarrassing.

94.

Defendants relied on a text message that they knew was "edited" and the word of objectively un-credible witnesses as the basis for their Newscast placing Lunn in a false light.

95.

Moreover, the Newscast's inclusion of a stand-up of Jovic purporting to call Lunn to ostensibly get his side of the story was misleading and contained demonstrable falsity, because Jovic knew that Lunn's phone had been retained by the police. The public perception of Lunn failing to comment or "hiding" further placed Lunn in a false light.

96.

As a result, Lunn was damaged by the actions of Defendants and is entitled to recover damages directly and proximately caused by Defendants.

INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS

97.

The allegations contained in Paragraphs 1-96 are realleged and incorporated as if fully reproduced hereinbelow.

LOUISIANA UNFAIR TRADE PRACTICES ACT

106.

The allegations contained in Paragraphs 1-105 are realleged and incorporated as if fully reproduced hereinbelow.

107.

The actions of the Defendants, who were his direct competitors and of which he was a consumer, are violations of the Louisiana Unfair Trade Practices Act, La. R.S. § 51:1409 *et seq*, and a copy of this Petition is being transmitted to the Attorney General of the State of Louisiana along with its filing for examination by that office in accordance with law.

108.

As described and alleged above, the actions taken by the Jovics and KTAL in the preparation, investigation (or lack thereof), writing, broadcasting and otherwise publishing the June 3, 2024, news story about Lunn were unfair, deceptive, unethical, offending to public policy and substantially injurious to Lunn, such that such actions constitute a violation of the Louisiana Unfair Trade Practices Act (La. R.S. 51:1401, *et seq*). By way of example only:

- a. Jovic had actual knowledge that the statements he was making about Lunn were false.
- b. Jovic saw that the text message from Coleman's phone about the age of the "catfish" was edited, such that he either knew that his report and story about the "catfish" being underage was false or purposefully avoided gaining that knowledge.
- c. Jovic knew or reasonably should have known that the credibility of his sources (Antonio Coleman, Kameron Kennon and Kataurio Grisby) were unreliable at best.
- d. Jovic knew that the contact that led to the police's investigation of Lunn did not originate or ever occur on MeetMe, but falsely made such a statement in the June 3, 2024, story anyway.
- e. At the time that Jovics and KTAL recorded the segment of the June 3, 2024 news story with Jovic "attempting to call" Lunn "for comment", Jovic had actual knowledge that Lunn's phone had been seized by Shreveport Police and was in Shreveport Police custody.

- f. Defendants' failure to investigate, fact check and obtain accurate information and their decisions to publish facts and information they knew to be false on June 3, 2024, offended common notions of ethical and moral conduct and raise serious questions regarding professional obligations and duties.
- g. After it came to light that the June 3, 2024 Newscast contained numerous false statements, implicated Lunn in a crime, and held Lunn out to be a pedophile, KTAL refused to retract the June 3, 2024 Newscast and, in response to a request by undersigned counsel for a retraction and apology, executives from NEXTSTAR simply stated that "Nexstar stands by the journalist [Jovic] and the stories as presented." See Exhibit "5".

109.

Simply put, Defendants engaged in a course of conduct which no ethical, properly motivated journalist would undertake: to pursue and publish as fact an improbable, sordid and devastating theory about one's chief competitor, without supporting credible evidence or investigation that would predictably destroy their primary, dominating professional competitor, and publish (and republish) feature news stories based thereon.

110.

There can be no doubt that this was more than mere negligence: the defamatory statements, failure to investigate, and purposeful avoidance of the truth by Jovic and KTAL in their June 3, 2024 Newscast were misrepresentative and deceptive at best.

111.

The June 3, 2024 Newscast was a featured and packaged news story, edited prior to broadcast, complete with supplemental footage to enhance the story ("b-roll"), graphics effects, voice-over sound on tape (VO/SOTs), interviews, and segments where Jovic is speaking directly into the camera ("stand-ups"), all of which was created by Jovic and KTAL. It was not an advertisement, editorial, talk show or opinion piece. It was aired during the first block ("A Block") of the evening news, which is the broadcast equivalent of the front page of a newspaper.

112.

Lunn has suffered significant and ascertainable competitive injury and loss as a result of Jovic's and KTAL's conduct, and accordingly, Lunn is entitled to and requests damages directly and proximately caused by Defendant's LUTPA violations, along with attorney's fees, costs and treble damages.

113.

The damage and injury to Lunn continues. Nexstar has refused to issue a retraction. And, Lunn, his family, his friends, his potential employers, and all internet users have ready access and exposure to the Newscast—as well to as a multitude of republications. “Where our memories fade, the Internet never forgets.” *See, May Crockett, The Internet (Never) Forgets*, 19 SMU SCI. & TECH. LAW REV. 2, 151 (2016).

114.

Lunn is entitled to and demands a trial by jury on all issues so triable in order to hold these Defendants accountable for their actions.

WHEREFORE, Petitioner, William “Bill” Lunn, prays that the Defendants be cited and served with this Petition and be required to answer within the delays allowed by law. Lunn further prays that after due proceedings are had, this Honorable Court renders a judgment in his favor and against the Defendants in the amount of damages to be proven at trial, including treble damages seen fit, as well as attorneys’ fees, costs, and legal interest from the date of demand, and all other just and equitable relief under the law.

{Signatures Appear on the Following Page}

Respectfully Submitted by:

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Stephen D. Cox, La. Bar No. 40741
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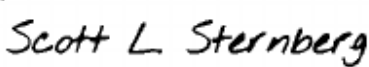
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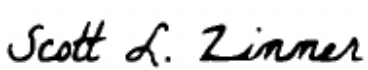
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Corporation Service Company
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Baton Rouge, LA 70801

KTAL NBC 6
c/o Mark McKay, Vice President
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318-629-6000

Dan Jovic
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Jaque Jovic
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Shreveport, LA 71107
318-629-6000

Copy Sent by Certified Mail to:

HON. LIZ MURRILL
LOUISIANA ATTORNEY GENERAL
Louisiana Department of Justice
Post Office Box 94005
Baton Rouge, Louisiana 70802

WILLIAM LUNN

NUMBER:

VERSUS

FIRST JUDICIAL DISTRICT COURT

NEXSTAR MEDIA, INC d/b/a KTAL,
DANIEL R. JOVIC SR. AND
JACQUELYN A. JOVIC

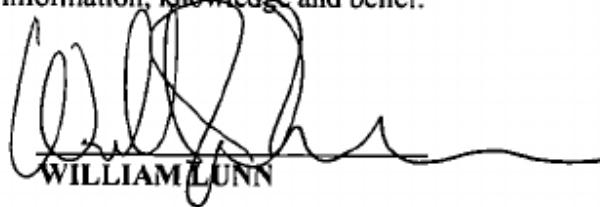
CADDO PARISH, LOUISIANA

VERIFICATION

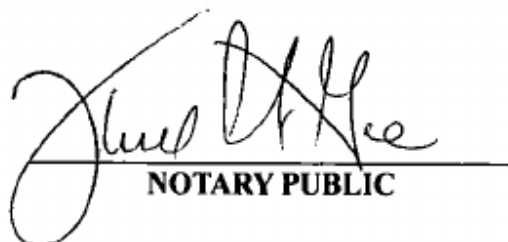
STATE OF LOUISIANA

PARISH OF BOSSIER

BEFORE ME, Notary Public, personally came and appeared WILLIAM LUNN, Petitioner in the foregoing *Petition for Damages*, who, after first being duly sworn, deposed and said that he has read the above and foregoing *Petition for Damages* and that all of the allegations of fact contained therein are true and correct to the best of his information, knowledge and belief.


WILLIAM LUNN

SWORN TO AND SUBSCRIBED before me, Notary Public, in Bossier City, Bossier Parish, Louisiana, this the 29th day of May 2025.


NOTARY PUBLIC

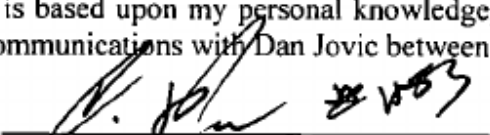
YOLUNDA E. MCGEE
NOTARY PUBLIC - ID #64533
STATE OF LOUISIANA
MY COMMISSION IS FOR LIFE



AFFIDAVIT OF Corporal Christopher Paul Bordelon

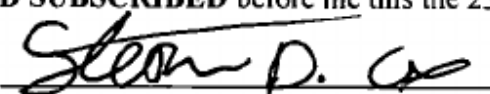
BEFORE ME, the undersigned authority, on this date personally appeared Corporal Christopher Paul Bordelon, who after being duly sworn, deposes and says as follows:

1. I am employed by the Shreveport Police Department, serving as the Public Information Officer for the Shreveport Police Department, and my professional address is 1234 Texas Avenue, Shreveport, LA 71101.
2. I am familiar with the police investigation and the events occurring on May 29, 2024 near 9517 Chaparral Lane, Shreveport, LA.
3. On May 29, 2024 William Lunn called 911 to report an assault and robbery.
4. On May 29, 2024, during the investigation Antonio Coleman, Kataurio Grigsby and Kameron Kennon accused William Lunn of being a child predator.
5. William Lunn was not arrested.
6. William Lunn voluntarily provided his phone to Shreveport Police on May 29, 2024 and it was returned to him on March 12, 2025. No evidence was found indicating William Lunn had communicated with a juvenile at all.
7. On June 1, 2024, Dan Jovic sent a text to me concerning the investigation. On Monday, June 3, 2024 I responded. After 1:49 p.m., in one of my responses, I shared the SPD incident report number with Dan Jovic.
8. The SPD incident report at that time was incomplete and consisted of only one page.
9. On June 6, 2024 at 11:49 a.m., I informed Dan Jovic that we were having trouble in prosecuting the case and there were issues in proving that William Lunn had communicated with a juvenile at all. In response at 11:51 a.m., Dan Jovic sent me a picture that included an edited text. At 11:52 a.m., I responded that the picture of the text conversation he sent me says "edited" underneath it. On that date I informed Dan Jovic that the text had been edited from 19 to 16 by either Coleman, Grigsby or Kennon.
10. Between June 1, 2024 and June 13, 2024, Dan Jovic and I communicated through text about the May 29, 2024 investigation. I have reviewed all those text messages and the eight pages of screenshots attached to this affidavit as Exhibit 1 are an accurate representation of those text messages.
11. I have also reviewed the screen shot depicting the time that texts were sent to me and from me on June 6, 2024. That screenshot is marked as Exhibit 2 and is accurate.
12. I have also reviewed the picture that Dan Jovic sent me on June 6, 2024. That photo is attached as Exhibit 3 to my affidavit and is accurate.
13. Coleman, Grigsby and Kennon were not working with local law enforcement.
14. On August 14, 2024, William Lunn was cleared of all charges. There was no evidence to support the claims of Coleman, Grigsby and Kennon.
15. This affidavit is based upon my personal knowledge, review of the investigative file and my text communications with Dan Jovic between June 1, 2024 and June 13, 2024.



Corp. Christopher Paul Bordelon
Shreveport Police Department

SWORN TO AND SUBSCRIBED before me this the 23rd day of May, 2025.



NOTARY PUBLIC

Stephen D. Cox, Notary Public
LA Bar No. 40741/Notary ID No: 203695
Bossier Parish, Louisiana
My Commission is for Life.

EXHIBIT

1

053020255CAN00000036

1:53

Bordelon Ex. 1

50% 



Dan Jovick



Thu, May 30 at 2:57 PM

Hey Corporal. Those folks involved in that big crash on Tuesday night, any update?

it looks like one person has passed away

I'm very sorry to hear that. Thank you.

Sat, Jun 1 at 5:14 PM

Hey pal, hope you're well. I just got some information given to me that if true is awful. I was told Bill Lund the lead anchor and news Director at KBS was caught with a 14-year-old girl and he ran from authorities. Did this happen?

Bill Lunn

KTBS

Mon, Jun 3 at 11:03 AM

Hey Corporal. Following up on the text I sent you over the weekend. Is there any validity to this at all?

ନିମ୍ନୋକ୍ତ ଖବର ସତ୍ୟତାପୂର୍ଣ୍ଣ କି ନା ତାହା କହିବା ପାଇଁ ମୋର ସମର୍ଥନ ନାହିଁ। ମୋର କେବଳ ସୂଚନା ଏହି ଖବର ଖୁବ୍ ଗୁପ୍ତ ଅଟେ ଏବଂ ଏହା କେବଳ ମୋର ଶୁଣିବା ଉପରେ ଆଧାର ରହିଛି।



Message

1 of 8



1:53

Bordelon Ex. 1

5G



Don Jovik

Mon, Jun 3 at 11:03 AM

Hey Corporal.. Following up on the text I sent you over the weekend. Is there any validity to this at all?

There is an investigation going on, however, I cannot confirm the age and I have no record that he ran from authorities

Where did it happen?

Mon, Jun 3 at 12:26 PM

Is there an incident report?

Mon, Jun 3 at 1:49 PM

There is a report. It's been written by our state and so I'm trying to get the report number from them.

Okay great. Thank you. I'll swing by there today and buy it.

24085541

Mon, Jun 3 at 9:50 PM

Hey Corporal. Watch at 10pm 🍷

Tue, Jun 4 at 12:02 AM



Message

2 of 8



003

05302025SCAN00000038

1:53

Bordelon Ex. 1

5G 

Dan Jovite

Hey Corporal, watch at 10pm 

Tue, Jun 4 at 12:02 AM



Local "predator hunters" spark SPD investigation into former KTBS news anchor Bill Lunn

9:13 AM

Tue, Jun 4 at 6:58 AM



Wow that is outstanding. Thank you for doing such a good job with this!!



Appreciate you, Chris. Thank you for always taking my calls. You're the best brother!!

Tue, Jun 4 at 13:23 AM



Brody, your story is the most watched thing in Strevport right now. I have gotten more calls today than I have in months and they all got it from



Message

3 of 8



004

05302025SCAN000000039



Bordelon, Eric

How many calls have you taken?
Ballpark?

I count eight. All of the networks plus
multiple emails.

Local networks or national?



Just local so far.

Tue, Jun 4 at 1:53 PM

How many interviews did you do
today?

Tue, Jun 4 at 7:12 PM

Haha. I actually only did one for you
guys. In my opinion, your network
broke the story so y'all get precedent.

KTBS has not asked for an interview. I
feel for them because I know they
don't condone that type of behavior,
but it is what it is.

Yeah, it's just awful and unfortunate all
the way around. Guy has to have some
kind of sickness to do this. Life thrown
away.

You thinking Thursday we might know
something on the potential charges?



Message

4 of 8



1:53

Bordelon Ex. 1

5G



Dan Jovik

You thinking Thursday we might know something on the potential charges?

That's what I'm hoping. At this point because of the intervention by the civilians, there are some issues and prosecuting

Me too.

I go on vacation on Friday.

Fri, Jun 5 at 9:52 PM

Will you have your phone while you're on vacation?

Yes.

If you call or text I will absolutely answer.

Thu, Jun 6 at 11:02 AM

Hey Corporal. You hearing anything? Should I expect something today?

What I think so. From what I hear, there are actually some issues for prosecuting the case

What issues?

They were able to identify the phone in the case and I heard that



Message

5 of 8



05302025SCAN00000041



Dan Jones



There was actually some issues for
prosecuting the case

What issues?

They were still waiting on the phone to
begin downloading as I heard but
apparently there may be issues
improving that Lura knew the girl was
a juvenile

improving



You see where it says edited
underneath it it's edited because they
no longer want to be seen in it

We are still downloading the phone
and trying to make a copy.



Mon, Jun 10 at 9:29 AM

Are you back yet?



11:30 AM

6 of 8





Dan Jovic



Mon, Jun 10 at 9:19 AM

Are you back yet??

Call me when you can

Wed, Jun 12 at 2:49 PM

Hey Corporal. Give me a holler at your convenience if you can.

Thu, Jun 13 at 2:30 PM

You in a spot to talk on cam?

We're putting the guys on the air and I want to do the vigilante angle.

Ya'Lisha Gatewood is on her way over to you right now. She'll be there in 10-15 minutes.

IC 4

The active investigation into the alleged victim in this case, what is he specifically being investigated for? What crime?

A possible instance of computer solicitation of a minor?



Possibly



Message

7 of 8



1:54

Bordelon Ex. 1

5G



Dan Jovik

The active investigation into the alleged victim in this case, what is he specifically being investigated for? What crime?

A possible instance of computer solicitation of a minor?



Possibly

Are the two guys still in city jail?

I would think they would be transferred to Cato by now.

Neither are there.

They may have bonded out by now

Who can I call to check?

Thu, Jun 12 at 5:30 PM

Can should be able to tell after they bonded out

Thank you.

Fri, Jun 12 at 5:16 PM

Hey Corporal. Any arrests in the Walmart deal?



Search

8 of 8



009

053020255LAN0000044

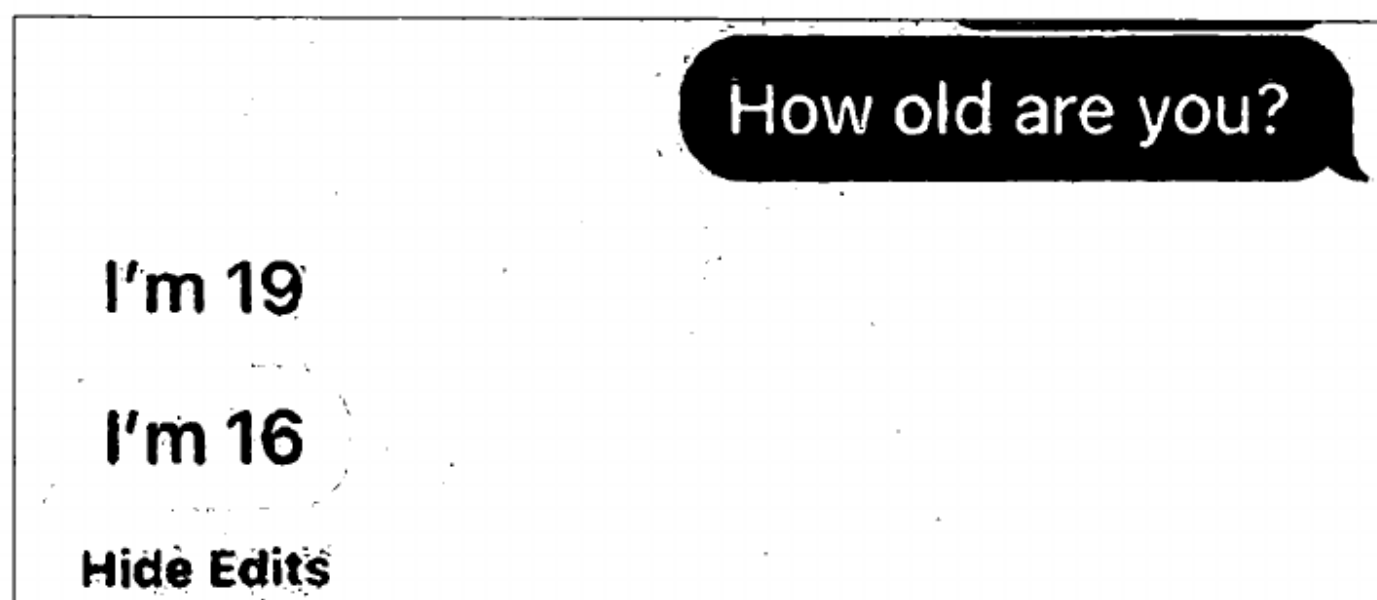
Bordelon Ex. 3

1 of 1

William Lunn's Phone Screen Shot**Tuesday May 28, 2024****10:01 P.M.**

Original text "I'm 19"

Coleman's subsequent edit to "I'm 16"



Local "predator hunters" spark SPD
investigation into former KTBS
news anchor Bill Lunn

KTAL News

June 4, 2024

12:00 a.m.

05302025SCAN000000048

1 DAN JOVIC:

2 Tonight we're sharing an explosive
3 report claiming a local news anchor, who
4 also served as the organization's news
5 director, is the subject of an ongoing
6 investigation by Shreveport Police. Good
7 evening, I'm Dan Jovic.

8 JACQUE JOVIC:

9 And I'm Jacque Jovic. The investigation
10 was sparked due to the efforts of three
11 local men who say they've made it their
12 mission to catch men trying to have sex
13 with underage girls.

14 DAN JOVIC:

15 They showed us the evidence they have
16 provided to police and share a first-hand
17 account of what they say unfolded that
18 day. It's our top story tonight.

19 ANTONIO COLEMAN:

20 What we do, we catch, like, child
21 predators.

22 DAN JOVIC:

23 Antonio Coleman, Kameron Kennon and
24 Kataurio Grigsby are self-described
25 predator hunters. For a little over

1 three weeks, they have been pretending to
2 be an underage girl online in an effort
3 to catfish local men who are allegedly
4 trying to meet up for sex.

5 KAMERON KENNON:

6 It's just crazy, like, how fast they
7 just, like, how fast they are willing to
8 meet young, like, young people. It's
9 just crazy.

10 DAN JOVIC:

11 The trio says they were surprised by
12 their efforts last Wednesday, May 29th.
13 That day, Shreveport Police received a
14 call at 11:04 a.m. The call came from
15 former KTBS News anchor Bill Lunn.
16 According to police and a call for
17 service report obtained by NBC, Lunn
18 claimed he was the victim of an assault
19 and battery.

20 But a case report on the alleged
21 incident paints a different story.
22 According to the case report, the alleged
23 offense is not for assault and battery,
24 rather for computer-aided solicitation
25 for sexual purposes. These three men are

1 the reason why.

2 ANTONIO COLEMAN:

3 As soon as he seen us, he darted out.

4 DAN JOVIC:

5 They created a fake MeetMe profile.

6 That profile is of an underage girl.

7 They say they then wait for men to like

8 the profile and spark a conversation.

9 They say Lunn initiated the conversation
10 Tuesday night.

11 ANTONIO COLEMAN:

12 They had a little conversation going
13 on and he asked how old she was. The
14 girl told him she was 15 years old.

15 DAN JOVIC:

16 Antonio says he was actually the
17 girl. He says he and Lunn exchanged
18 dozens upon dozens of text messages over
19 the next several hours where the
20 conversation quickly turned to sex.

21 ANTONIO COLEMAN:

22 He was, like, sending, like, pictures
23 to her. He was saying he wanted to do
24 this to her. Like, explicit things I
25 can't say on camera.

1 DAN JOVIC:

2 Antonio checked the phone number he
3 was texting with. It was the same number
4 Lunn lists on his LinkedIn profile.

5 ANTONIO COLEMAN:

6 I was, like, oh my God. So I go to
7 his Facebook, I'm like this is really his
8 number. This is real Bill Lunn. And so,
9 it was just really just crazy.

10 DAN JOVIC:

11 We were shown images in the text
12 message chain displaying sexually
13 explicit photos that Lunn allegedly sent
14 of himself. Antonio says Lunn set up a
15 meeting date last Wednesday.

16 ANTONIO COLEMAN:

17 He came on his lunch break from work
18 to come meet her.

19 DAN JOVIC:

20 According to Antonio, when Lunn
21 arrived at their designated meeting spot,
22 the trio jumped out, informing him of
23 what was happening.

24 ANTONIO COLEMAN;

25 You could see the guilt in his eyes.

1 He knew, like, oh, I'm done.

2 DAN JOVIC:

3 They say Lunn ran and later called
4 police, saying he was the victim of an
5 assault and battery. The three men
6 waited for police to arrive. They say
7 hours of questioning followed. The call
8 for service report shows police spent 4
9 hours and 21 minutes at the scene. The
10 young men say Lunn was handcuffed in the
11 back of a police vehicle for hours.

12 All parties were released from the
13 scene with no charges filed. Shreveport
14 police told me there was an active
15 investigation into Lunn based on the
16 events of that day. I tried reaching out
17 to Lunn to get his side of the story.

18 BILL LUNN:

19 "Please leave your name and number
20 and I'll get back to you as soon as
21 possible. Thanks. Have a great day."

22 DAN JOVIC:

23 "Bill, this is Dan Jovic calling from
24 NBC6 News. Trying to get your side of
25 the story related to an incident that

1 took place last week." My call went
2 unanswered and was not returned.

3 KATAURIO GRIGSBY:

4 Thing is, as Bill was running off, he
5 yells, "I have a wife and kids". I'm
6 just sitting there, as he's running off,
7 I'm thinking in my head, how can you say
8 that when you literally just walked
9 yourself in the house expecting to meet
10 an underage teenager. Because he was
11 going to do it regardless.

12 DAN JOVIC:

13 Lunn resigned Monday from both of his
14 roles at KTBS. And Lunn's profile was
15 immediately scrubbed from the station's
16 website. Calls to KTBS management
17 regarding the incident have gone
18 unanswered. Antonio Cameron and Kataurio
19 said they have allegedly caught ten men
20 in the span of just three weeks through
21 their vigilante efforts.

22
23
24
25

TRANSCRIPTION CERTIFICATE

I, Angela T. Bulloch, certified court reporter in and for the State of Louisiana, do hereby certify that the above transcription of the audio file provided to me by Ryan Gatti, Esq. was prepared by me or under my direct supervision and is a true and accurate transcript to the best of my ability;

That due to the spontaneous discourse of this audio file proceeding, where necessary, dashes (--) have been used to indicate pauses, changes in thought, and/or talkovers; that same is the proper methods for Court Reporter's transcription of a proceeding, and that dashes (--) do not indicate that words or phrases have been left out of this transcript;

That any words and/or names which could not be verified through reference material have been denoted with the phrase "(phonetically spelled)."

That the quality of the audio file may reflect connectivity problems and/or indiscernible audio and will be denoted with the phrase "(inaudible)."

Angela T. Bulloch

ANGELA T. BULLOCH, CCR, LA#20086



A a.m 1:6 3:14 ability 8:7 account 2:17 accurate 8:7 active 6:14 alleged 3:20,22 allegedly 3:3 5:13 7:19 anchor 1:3 2:3 3:15 and/or 8:11,15 8:19 Angela 8:2,24 Antonio 2:19,23 4:2,11,16,21 5:2,5,14,16,20 5:24 7:18 arrive 6:6 arrived 5:21 asked 4:13 assault 3:18,23 6:5 audio 8:4,9,18,20	camera 4:25 Cameron 7:18 case 3:20,22 catch 2:12,20 catfish 3:3 caught 7:19 CCR 8:24 certified 8:2 certify 8:4 chain 5:12 changes 8:10 charges 6:13 checked 5:2 child 2:20 claimed 3:18 claiming 2:3 Coleman 2:19,23 4:2,11,21 5:5 5:16,24 come 5:18 computer-aided 3:24 connectivity 8:19 conversation 4:8 4:9,12,20 court 8:2,12 crazy 3:6,9 5:9 created 4:5	director 2:5 discourse 8:8 displaying 5:12 dozens 4:18,18 due 2:10 8:8	H handcuffed 6:10 happening 5:23 head 7:7 hours 4:19 6:7,9 6:11 house 7:9 hunters 1:1 2:25	L LA#20086 8:24 leave 6:19 left 8:14 LinkedIn 5:4 lists 5:4 literally 7:8 little 2:25 4:12 local 1:1 2:3,11 3:3 Louisiana 8:3 lunch 5:17 Lunn 1:3 3:15,17 4:9,17 5:4,8,13 5:14,20 6:3,10 6:15,17,18 7:13 Lunn's 7:14
B back 6:11,20 based 6:15 battery 3:19,23 6:5 best 8:7 Bill 1:3 3:15 5:8 6:18,23 7:4 break 5:17 Bulloch 8:2,24	D Dan 2:1,7,14,22 3:10 4:4,15 5:1 5:10,19 6:2,22 6:23 7:12 darted 4:3 dashes 8:9,13 date 5:15 day 2:18 3:13 6:16,21 denoted 8:17,20 designated 5:21 different 3:21 direct 8:6	F F 8:1 Facebook 5:7 fake 4:5 fast 3:6,7 file 8:4,9,18 filed 6:13 first-hand 2:16 followed 6:7 former 1:2 3:15	J Jacque 2:8,9 Jovic 2:1,7,8,9,14 2:22 3:10 4:4 4:15 5:1,10,19 6:2,22,23 7:12 jumped 5:22 June 1:5	M management 7:16 material 8:16 meet 3:4,8 5:18 7:9 meeting 5:15,21 MeetMe 4:5 men 2:11,12 3:3 3:25 4:7 6:5,10 7:19 message 5:12 messages 4:18 methods 8:11 minutes 6:9 mission 2:12 Monday 7:13
C C 8:1,1,1 call 3:14,14,16 6:7 7:1 called 6:3 calling 6:23 Calls 7:16		G Gatti 8:5 girl 3:2 4:6,14,17 girls 2:13 go 5:6 God 5:6 going 4:12 7:11 Good 2:6 great 6:21 Grigsby 2:24 7:3 guilt 5:25	K Kameron 2:23 3:5 Kataurio 2:24 7:3,18 Kennon 2:23 3:5 kids 7:5 knew 6:1 KTAL 1:4 KTBS 1:2 3:15 7:14,16	N N 8:1,1 name 6:19 names 8:15 NBC 3:17 NBC6 6:24 necessary 8:9

news 1:3,4 2:3,4 3:15 6:24 night 4:10 number 5:2,3,8 6:19	proper 8:11 provided 2:16 8:5 purposes 3:25	2:24 sending 4:22 sent 5:13 served 2:4 service 3:17 6:8 set 5:14 sex 2:12 3:4 4:20 sexual 3:25 sexually 5:12 share 2:16 sharing 2:2 showed 2:15 shown 5:11 shows 6:8 Shreveport 2:6 3:13 6:13 side 6:17,24 sitting 7:6 solicitation 3:24 soon 4:3 6:20 span 7:20 spark 1:1 4:8 sparked 2:10 SPD 1:1 spelled 8:17 spent 6:8 spontaneous 8:8 spot 5:21 State 8:3 station's 7:15 story 2:18 3:21 6:17,25 subject 2:5 supervision 8:6 surprised 3:11	Thanks 6:21 Thing 7:4 things 4:24 thinking 7:7 thought 8:10 three 2:10 3:1,25 6:5 7:20 told 4:14 6:14 tonight 2:2,18 top 2:18 transcript 8:7,14 transcription 8:4 8:12 tried 6:16 trio 3:11 5:22 true 8:6 trying 2:12 3:4 6:24 Tuesday 4:10 turned 4:20	weeks 3:1 7:20 went 7:1 wife 7:5 willing 3:7 words 8:13,15 work 5:17
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P	R			years 4:14 yells 7:5 young 3:8,8 6:10
P 8:1 paints 3:21 parties 6:12 pauses 8:10 people 3:8 phone 5:2 phonetically 8:17 photos 5:13 phrase 8:17,20 phrases 8:13 pictures 4:22 place 7:1 Please 6:19 police 2:6,16 3:13 3:16 6:4,6,8,11 6:14 possible 6:21 predator 1:1 2:25 predators 2:21 prepared 8:5 pretending 3:1 problems 8:19 proceeding 8:9 8:12 profile 4:5,6,8 5:4 7:14	R 8:1,1,1 ran 6:3 reaching 6:16 real 5:8 really 5:7,9 reason 4:1 received 3:13 reference 8:16 reflect 8:19 regarding 7:17 regardless 7:11 related 6:25 released 6:12 report 2:3 3:17 3:20,22 6:8 reporter 8:3 Reporter's 8:12 resigned 7:13 returned 7:2 roles 7:14 running 7:4,6 Ryan 8:5			Z
	S			0
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		T 8:1,1,1,1,2,24 talkovers 8:11 teenager 7:10 ten 7:19 text 4:18 5:11 texting 5:3	U	2
			unanswered 7:2 7:18 underage 2:13 3:2 4:6 7:10 unfolded 2:17	2024 1:5 21 6:9 29th 3:12
			V	3
			vehicle 6:11 verified 8:16 victim 3:18 6:4 vigilante 7:21	4
			W	4 1:5 6:8
			wait 4:7 waited 6:6 walked 7:8 wanted 4:23 we're 2:2 website 7:16 Wednesday 3:12 5:15 week 7:1	

Flash Drive



Ryan Gatti

From: Christine Reilly <creilly@nexstar.tv>
Sent: Wednesday, March 12, 2025 12:50 PM
To: Ryan Gatti
Cc: Christine Reilly
Subject: follow up : Schedule Call :Follow Up 3:
William Lunn - Civil Damages Matter

Good Afternoon Mr. Gatti,

Thank you for your recent communications.

Nexstar stands by the journalist and the stories as presented.

Best,
Christine Reilly

Christine Reilly
Vice President & Associate General Counsel
Nexstar Media Inc.
545 E. John Carpenter Freeway, Suite 700 Irving,
TX 75062
(972) 764-6721 – Phone
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From: Ryan Gatti <ryan@ryangatti.com> **Sent:** Wednesday, March 12, 2025 12:24 PM **To:** Christine Reilly <creilly@nexstar.tv>
Cc: Christine Reilly <creilly@nexstar.tv>
Subject: Re: Schedule Call :Follow Up 3: William Lunn - Civil Damages Matter

Just following up, give me a call when you can.

Ryan Gatti Attorney
Ryan Gatti Attorney LLC | 4723 Viking Drive | Bossier City, Louisiana 71111
(d): 318-560-6587 | (o): 318-752-1012 | (f) 318-752-5720
ryan@ryangatti.com www.ryangatti.com

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On Mar 6, 2025, at 4:25 PM, Christine Reilly <creilly@nexstar.tv> wrote:

Good Afternoon Mr. Gatti,

I believe you wish to have a phone conversation re: the W. Lunn matter.

If yes, I am available for a call Monday afternoon (2-4pm CST).

The station's GM, Mark McKay, would also be present on the call.

Please confirm a time that works for you.

Best,
Christine Reilly

Christine Reilly
Vice President & Associate General Counsel
Nexstar Media Inc.
545 E. John Carpenter Freeway, Suite 700 Irving,
TX 75062
(972) 764-6721 – Phone
(972) 373-8888 – Fax
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<image001.png>

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From: Christine Reilly <creilly@nexstar.tv>
Sent: Tuesday, March 4, 2025 2:20 PM
To: Ryan Gatti
<ryan@ryangatti.com> **Cc:**
Christine Reilly
<creilly@nexstar.tv>
Subject: Follow Up 3: William Lunn - Civil Damages Matter

Good Afternoon Mr. Gatti,

I received your voicemail this afternoon.

I am in meetings all day and have not had an opportunity to communicate with the station on your most recent communication.

I will follow up with you tomorrow.

Best,
Christine Reilly

Christine Reilly
Vice President & Associate General
Counsel Nexstar Media Inc.
545 E. John Carpenter Freeway, Suite 700
Irving, TX 75062
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(972) 373-8888 – Fax
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From: Ryan Gatti <ryan@ryangatti.com> **Sent:** Thursday, February 27, 2025 4:43 PM **To:** Christine Reilly <creilly@nexstar.tv> **Subject:** RE: Follow Up 2: William Lunn - Civil Damages Matter

Christine,

To clarify, our expert found that many of the stories online and on social media were based off and even linked to the still active story on the KTAL website. There is no retraction on this post. The YouTube version of the story has over 6500 views and does not include a link to a retraction. The story stating charges were dropped has a mere 356 views and does not discuss the felony arrest of the "vigilantes". It's obvious the story was written to increase traffic to site.

It would be helpful if KTAL would review each line of the YouTube video and story on the website retract each untrue statement. I would be glad to review the retraction and approve or add to it.

The article you mentioned with the New York Post references the KTAL report in paragraph 2. The New York Post story posted on June 5, 2024 at 2:15 PM. ([TV anchor Bill Lunn resigns after he was accused of sexting teen girl](#)) The New York Post post includes a source link in paragraph two to the KTAL report from June 4, 2024 ([Local "predator hunters" spark Shreveport police investigation into former KTBS news anchor](#)) This seems to be consistent with most of the links and shares we have cataloged. Most social media

influencers use a link to the article or pictures from the YouTube video. Those cannot be removed.

In fact, Jovic's story is shared or referenced hundreds of times. This link is most troublesome [News Director suspected of soliciting sex from teen after undercover civilian-led sex sting - YouTube](#). It is obvious FOX 26 in Houston did not interview the three men and they simply relied on KTAL to expand on the story. They will assert they pulled most of their content from Jovic's story and that they relied on him following the 10 Commandments of Journalism before printing. They did post a meaningful retraction and won't be sharing KTAL items anytime soon.

We have compared KTAL's reporting of the story with KTBS, KSLA and other local stations. In fact, those other stations when contacted were very surprised at the angle Dan took. They gave the specific reasons that they did not report to the extreme level that Dan did. One local news person mentioned they discussed with Dan that he should not run that story until an arrest was made. He was very surprised Dan ran with the story allowing the witnesses to make wild self-serving allegations that were not true. Remember these men were being investigated for assaulting Bill Lunn so the story they were "vigilantes" was self-serving. The news family in our area is very small and no one agrees the story should have been run.

Local news teams gave these objective reasons for not interviewing the felons or stating merely that "Bill is under investigation." Their reasons included but are not limited to:

1. Bill called 911- "in all my years we have never had a child predator facing mandatory jail time; call 911 because the victims family beat them up."

2. Bill was not arrested- "Gatti, if there was any evidence at all, Bill would have been in jail that day on a 500,000 bond."
3. Bill didn't have his phone- "What troubled me the most about Jovic's story is it was really a hit piece against a competitor." "He knew the police had Bill's phone when he called it for his story—he literally called Bill's cell phone after the police told him they had Bill's phone!- he knew he was not going to get Bill to answer because Bill didn't have his phone! That part of the video was most troubling to me"
4. The witness story was unbelievable- "Those three guys were not telling the truth. They had never called the police after "catching a predator." "They kept changing the age of the victim 16, then 15." "It was obvious they were trolling dating apps to catfish men." "The police has to go back in the house and get Bill's credit card—they still had it in the home! Evidently they were taking cash and credit cards after beating victims." "Dan just turned a blind eye to obvious."

Additionally, our focus group did not side with Dan.

I hope we can resolve this matter quietly prior to filing suit. A mediation might be helpful to give Bill closure. Please review this matter and advise. Thanks,

Ryan Gatti Attorney

Ryan Gatti Attorney LLC | 4723 Viking Drive |
Bossier City, Louisiana 71111

(d): 318-560-6587 | (o): 318-752-1012 | (f) 318-752-5720

ryan@ryangatti.com | www.ryangatti.com

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From: Ryan Gatti
Sent: Thursday, February 27, 2025 1:35 PM
To: Christine Reilly <creilly@nexstar.tv>
Subject: RE: Follow Up 2: William Lunn - Civil Damages Matter

Good afternoon,

Could you send me the New York Post piece you are referencing ?

Ryan
Gatti
Attorn
ey

Ryan Gatti Attorney LLC | 4723 Viking Drive |
Bossier City, Louisiana 71111
(d): 318-560-6587 | (o): 318-752-1012 | (f) 318-752-
5720

ryan@ryangatti.com | www.ryangatti.com

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7

From: Christine Reilly <creilly@nexstar.tv>
Sent: Thursday, February 27, 2025 12:38 PM

05302025SCAN00000066

8

To: Ryan Gatti <ryan@ryangatti.com>
Cc: Christine Reilly <creilly@nexstar.tv>
Subject: Follow Up 2: William Lunn - Civil Damages Matter

Good Afternoon Mr. Gatti,

As a follow up to your email below, the station, along with various other media outlets including the New York Post, reported on this matter – at various stages - beginning in the first week of June 2024.

KTAL continued to cover the matter through August 2024. That coverage included, among other facts, Mr. Lunn's denial of any wrongdoing as communicated in a statement provided by Mr. Dhu Thompson, Mr. Lunn's former attorney, on June 6, 2024, and the arrest of two of the three alleged vigilantes for assault and battery of an unidentified man on June 13, 2024.

KTAL also covered when Mr. Lunn was cleared of all charges – on August 14, 2024. That story clearly stated, "Mr. Lunn will not be charged with a crime." The story summarized the matter and included an interview with Cpl. Chris Bordelon who confirmed that there "was evidence [of a crime] ...unbeknownst to them [patrol officers] that evidence had been altered" and that following a subsequent investigation by the vice unit of the phones, police determined that the claims were falsified. Therefore, the story confirmed Mr. Lunn's innocence and "a conclusion of this [criminal investigation] case".

On August 19, 2024, KTAL provided Mr. Dhu Thompson, Mr. Lunn's former attorney, with an opportunity to speak on camera as well.

There was a police investigation. Mr. Lunn was given an opportunity (and did) comment through his former attorney.

The police concluded the investigation, and Mr. Lunn was not charged with any crime. The final story clarified that the investigation involving Mr. Lunn was initiated based on false information.

Accordingly, the station is unclear on your reference to a retraction in the 2/24/2025 and your mention of a retraction below.

Please clarify.

Much appreciated,
Christine Reilly

Christine Reilly
Vice President & Associate General
Counsel Nexstar Media Inc.
545 E. John Carpenter Freeway, Suite 700
Irving, TX 75062
(972) 764-6721 – Phone
(972) 373-8888 – Fax
creilly@nexstar.tv
NASDAQ: NXST
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From: Ryan Gatti <ryan@ryangatti.com> **Sent:** Wednesday, February 26, 2025 1:12 PM **To:** Christine Reilly <creilly@nexstar.tv> **Subject:** RE: Follow Up: William Lunn - Civil Damages Matter

Ms. Reilly,

Thank you for your response. Has there been a retraction published that we missed?

Ryan Gatti Attorney

Ryan Gatti Attorney LLC | 4723 Viking Drive |
Bossier City, Louisiana 71111
(d): 318-560-6587 | (o): 318-752-1012 | (f) 318-752-5720
ryan@ryangatti.com | www.ryangatti.com
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From: Christine Reilly <creilly@nexstar.tv>
Sent: Wednesday, February 26, 2025
11:13 AM **To:** Ryan Gatti
<ryan@ryangatti.com>
Cc: Christine Reilly <creilly@nexstar.tv>
Subject: Follow Up: William Lunn - Civil
Damages Matter

Good Afternoon Mr. Gatti,

We are in receipt of your letter dated
2/24/2025 (also attached hereto).

The attached letter is the second
communication received from your office.

The first such communication, dated
and received on 2/12/2025, was a request
for *preservation* and did not mention or
request a retraction.

The attached 2/24/2025 letter is the
first and only mention of a retraction.

If you care to discuss this further,
I am happy to circulate an invitation to a
zoom call. Please advise.

Regards.
Christine
Reilly

Christine Reilly
Vice President & Associate General
Counsel Nexstar Media Inc.
545 E. John Carpenter Freeway, Suite 700
Irving, TX 75062
(972) 764-6721 – Phone ¹¹

05302025SCAN000000070

(972) 373-8888 – Fax
creilly@nexstar.tv
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From: Evette McGee <evette@ryangatti.com>
Sent: Monday, February 24, 2025 4:21 PM
To: Mark P. McKay <mmckay@ktalnews.tv>
Cc: Ryan Gatti <ryan@ryangatti.com>; Stephen Cox <stephen@ryangatti.com>; Evette McGee <evette@ryangatti.com>
Subject: William Lunn - Civil Damages Matter

<image003.png>
<image004.png>

Kind regards,

Y. Evette McGee

PLPS, BA | Certified Paralegal evette@ryangatti.com

Ryan E. Gatti, Attorney at Law, LLC

4723 Viking Drive | Bossier City, Louisiana
71111 Phone 318.752.1012 | Fax
318.752.5720

<https://www.ryangatti.com/>

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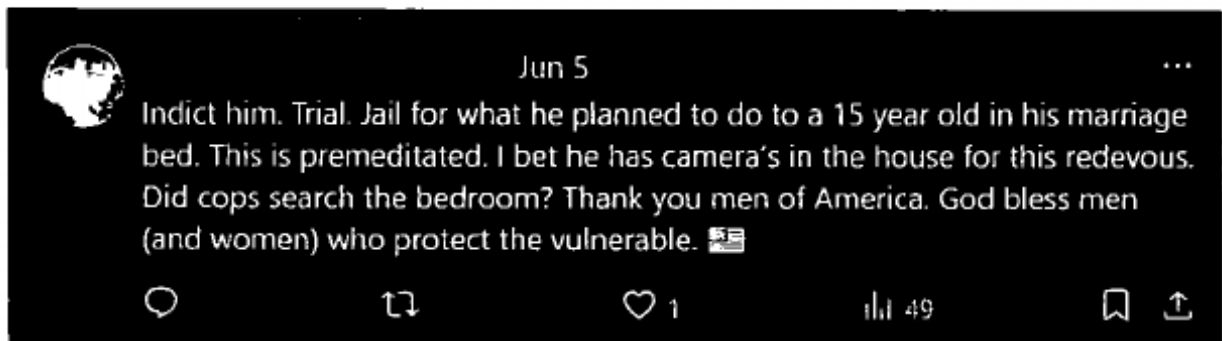
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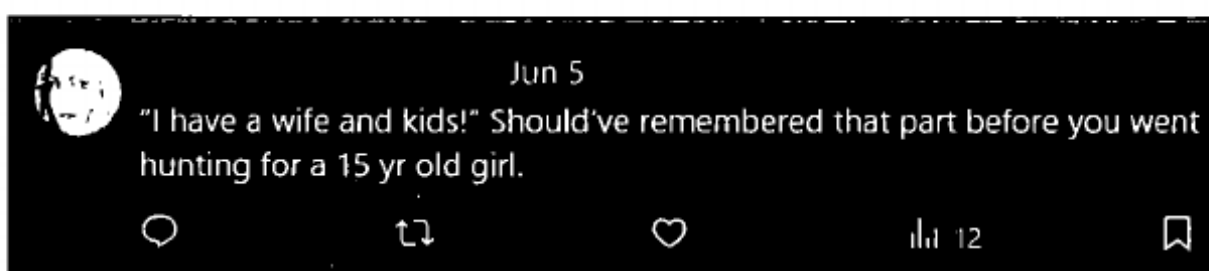
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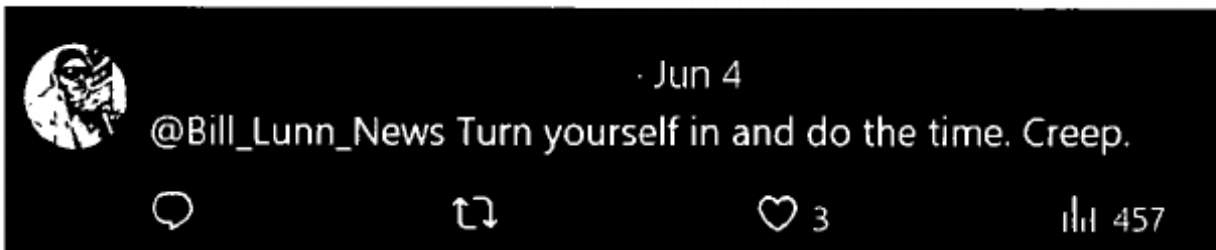
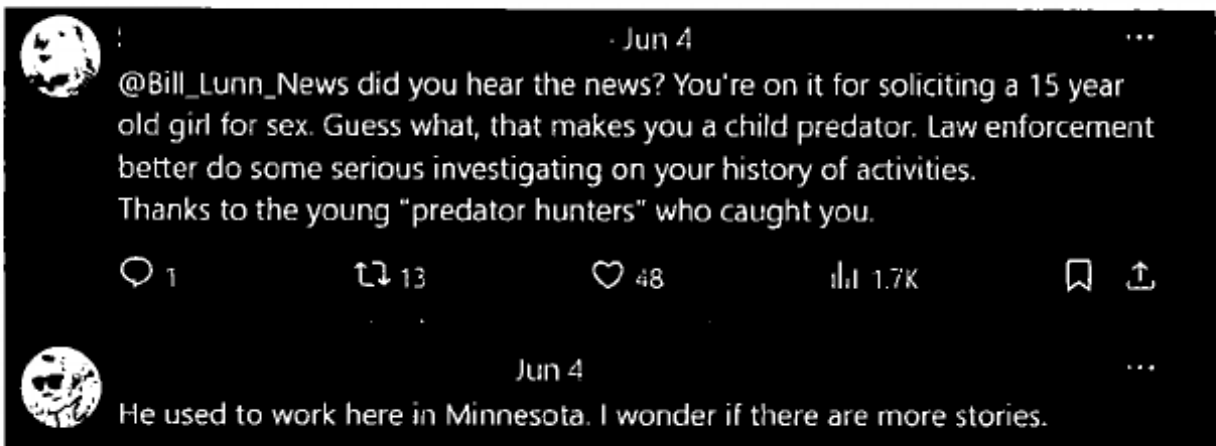
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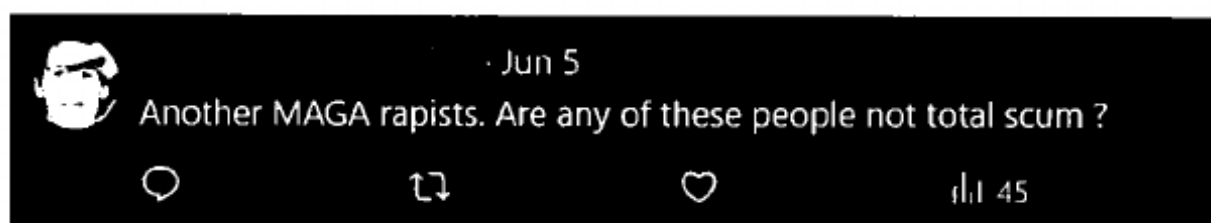
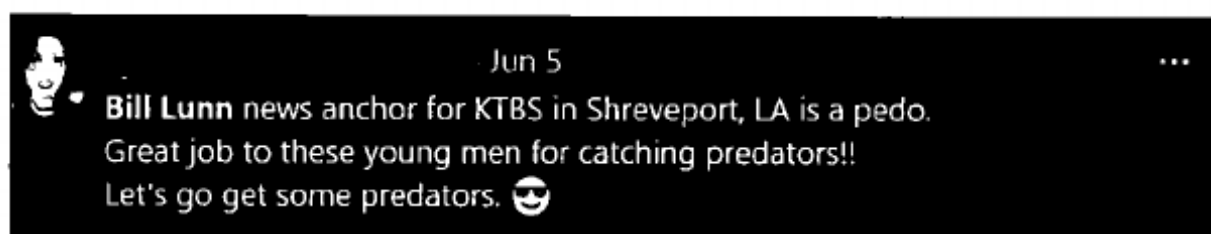
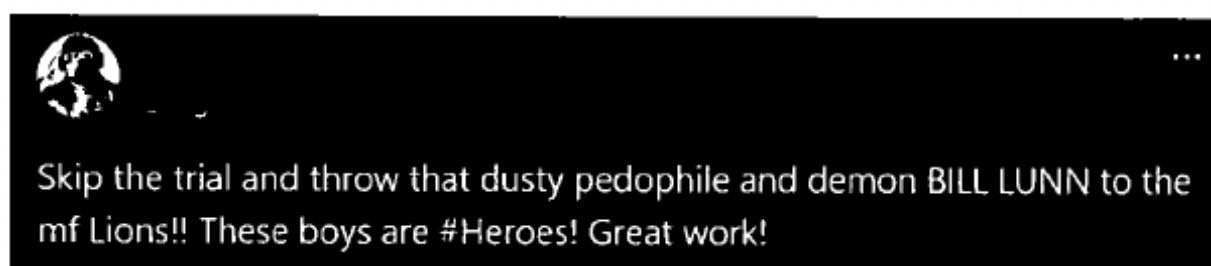
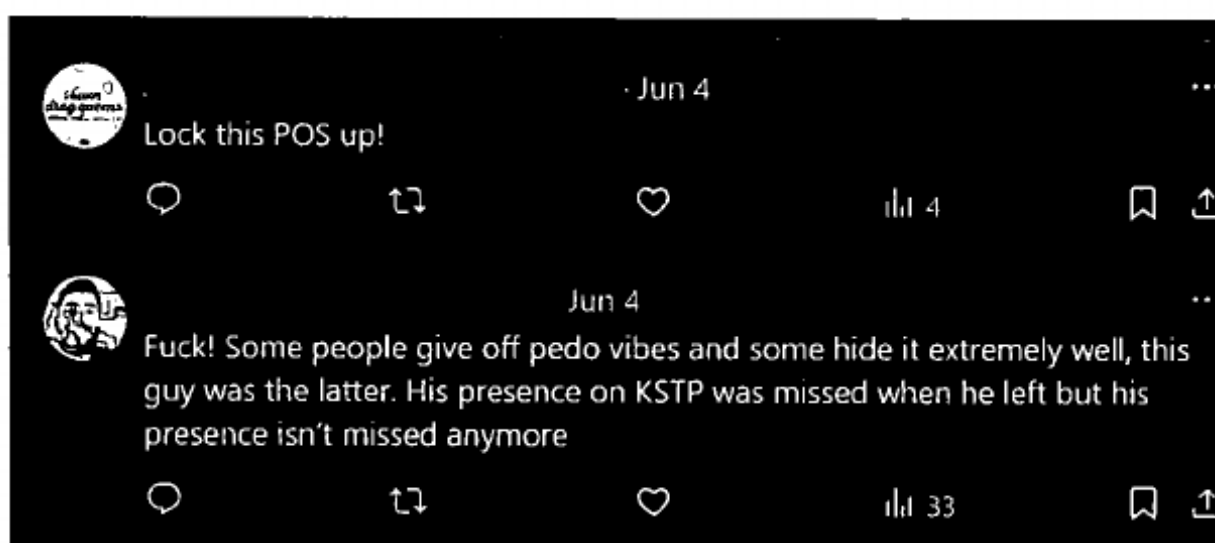
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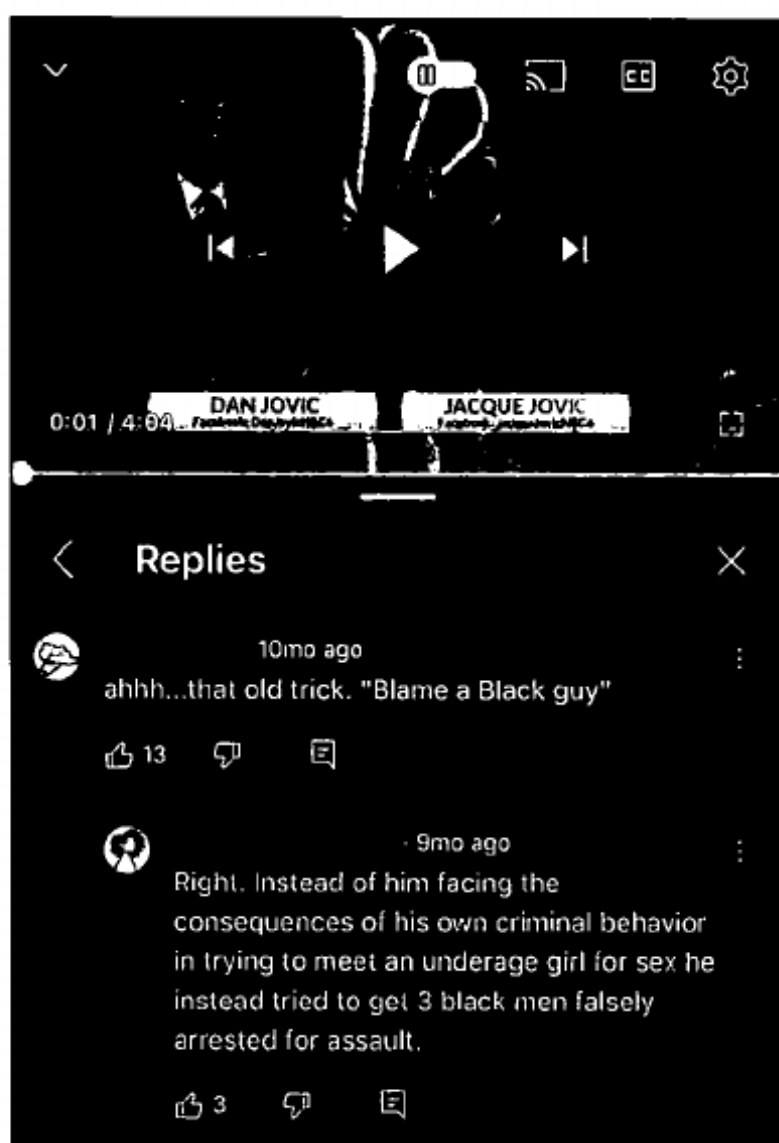




They did a great job wow it seems like you just don't know people you see on TV . This was a man who was giving out bikes to kids in the Shreveport community . Parents please protect your kids no matter what .

47w Like Reply

2



Citation

WILLIAM LUNN
VS
NEXSTAR MEDIA INC

NO. 657548- A
STATE OF LOUISIANA
PARISH OF CADDO
FIRST JUDICIAL DISTRICT COURT

THE STATE OF LOUISIANA, TO: DANIEL R JOVIC SR
3150 NORTH MARKET ST
SHREVEPORT, LA 71107

YOU HAVE BEEN SUED.
Attached to this Citation is a certified copy of the Petition.* The petition tells you what you are being sued for.

You must EITHER do what the petition asks, OR, within TWENTY-ONE (21) days after you have received these documents, you must file an answer or other legal pleadings in the Office of the Clerk of this Court at the Caddo Parish Court House, 501 Texas Street, Room 103, Shreveport, Louisiana.

If you do not do what the petition asks, or if you do not file an answer or legal pleading within TWENTY-ONE (21) days, a judgment may be entered against you. Please be aware of Act 174 of the 2021 regular session of the Louisiana Legislature which changed delays for answering. The full text of this bill can be found at <https://legis.la.gov/legis/BillInfo.aspx?i=239989>.

This Citation was issued by the Clerk of Court for Caddo Parish, on this date May 30, 2025.

*Also attached are the following:

MIKE SPENCE, CLERK OF COURT

RYAN GATTI
Attorney

FILE COPY

053020255CAN00000079

Citation

WILLIAM LUNN
VS
NEXSTAR MEDIA INC

NO. 657548- A
STATE OF LOUISIANA
PARISH OF CADDO
FIRST JUDICIAL DISTRICT COURT

THE STATE OF LOUISIANA, TO: JACQUELYN A JOVIC
3150 NORTH MARKET ST
SHREVEPORT, LA 71107

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MIKE SPENCE, CLERK OF COURT

RYAN GATTI
Attorney

FILE COPY

05302025SCAN00000000

Citation

WILLIAM LUNN
VS
NEXSTAR MEDIA INC

NO. 657548- A
STATE OF LOUISIANA
PARISH OF CADDO
FIRST JUDICIAL DISTRICT COURT

THE STATE OF LOUISIANA, TO: NEXSTAR MEDIA INC DBA KTAL
THRU CORPORATION SERVICE COMPANY
450 LAUREL ST 8TH FLOOR
BATON ROUGE, LA
70801

YOU HAVE BEEN SUED.

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This Citation was issued by the Clerk of Court for Caddo Parish, on this date May 30, 2025.

*Also attached are the following:

MIKE SPENCE, CLERK OF COURT

RYAN GATTI

Attorney

FILE COPY

05302025SCAN00000081

Citation

WILLIAM LUNN
VS
NEXSTAR MEDIA INC

NO. 657548- A
STATE OF LOUISIANA
PARISH OF CADDO
FIRST JUDICIAL DISTRICT COURT

THE STATE OF LOUISIANA, TO: KTAL NBC 6
C/O MARK MCKAY, VICE PRESIDENT
3150 NORTH MARKET ST
SHREVEPORT, LA
71107

YOU HAVE BEEN SUED.
Attached to this Citation is a certified copy of the Petition.* The petition tells you what you are being sued for.

You must EITHER do what the petition asks, OR, within TWENTY-ONE (21) days after you have received these documents, you must file an answer or other legal pleadings in the Office of the Clerk of this Court at the Caddo Parish Court House, 501 Texas Street, Room 103, Shreveport, Louisiana.

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This Citation was issued by the Clerk of Court for Caddo Parish, on this date May 30, 2025.

*Also attached are the following:

MIKE SPENCE, CLERK OF COURT

RYAN GATTI
Attorney

FILE COPY

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