

UNITED STATES DISTRICT COURT

for the

Southern District of Indiana

FILED

9:31 am, May 05, 2020

U.S. DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA

Laura A. Briggs, Clerk

PIERRE Q. PULLINS

Plaintiff(s)

-v-

RADIO ONE INC. WTLC

Defendant

106.7 FM AM130

Case No. 1:20-cv-01313-JRS-DLP

Jury Demanded.

COMPLAINT FOR CONSPIRACY AND

(Title your document on this line.)

TORTIOUS INTERFERENCE IN A CAMPAIGN FOR
FEDERAL OFFICE AND CIVIL RIGHT VIOLATION

I am the plaintiff defendant (circle one) in this case and I state as follows:

The Defendant Radio One, WTLC in Indianapolis
Indiana conspired with another news
outlet that serves the African-American
community in Indianapolis, Indiana the Indianapolis
Recorder to exclude, Pullins, who was a
candidate for the Democrat nomination of
U.S. Representative for the Seventh Congressional
District, from being interviewed because Pullins
was the only candidate calling for the Incumbent

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Congressman Andre Carson, to address allegations of harassment claims and if taxpayer funds were used to settle any complaints. Pullins alleges the station manager and radio talk show host deliberately excluded Pullins, while allowing the other Democrat challengers to interview. They used Radio One's FCC license to accomplish this conspiracy. It was targeted at the African American Community to affect the outcome of an election for federal office.

Date: 5/3/2020Signed: Demetrius Pullins

Filing party

Address and Telephone Number:

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Indpls, IN 46224
317 797 7190

CERTIFICATE OF SERVICE

I certify that a copy of this document _____
 (fill in name of your document)

has been mailed, postage prepaid, upon (insert names and addresses of other parties in space provided):