

STATE OF NORTH CAROLINA
COUNTY OF MOORE

IN THE GENERAL COURT OF JUSTICE
SUPERIOR COURT DIVISION
26-CVS-_____

TODD MANESS,)
Plaintiff,)
vs.)
DEBORAH ANNE J DUERRING, and)
DONNA ELIZABETH TANNER,)
Defendants.)
_____)

COMPLAINT
(Jury Trial Demanded)

NOW COMES, **Todd Maness** (hereinafter “Plaintiff”), by and through his undersigned attorney, complaining of **Deborah Anne J Duerring** and **Donna Elizabeth Tanner** (hereinafter “Defendants”) and alleges and says as follows:

Parties

1. That the Plaintiff is a citizen and resident of Moore County, N.C. and was so at the time of the matters and things alleged herein;
2. That Defendant Duerring is a citizen and resident of Moore County, NC and was so at the time of the matters and things alleged herein;
3. That Defendant Tanner is a citizen and resident of Moore County, NC and was so at the time of the matters and things alleged herein;

Jurisdiction and Venue

4. That this court has jurisdiction over Defendants pursuant to N.C.G.S. Section 1-75.4;
5. That this court has subject matter jurisdiction over this matter pursuant to N.C.G.S. Section 7A-243;
6. That Moore County is the proper venue for this action;

Facts

7. Beginning in 2023, Defendant Tanner set upon a course of action to undermine the Plaintiff in his capacity as the Clerk of Court of Moore County, N.C.;
8. Specifically, Defendant Tanner began to allege that Plaintiff was not performing his duties as the elected Clerk of Court in an effort to defame Plaintiff, turn public

opinion against the Plaintiff and to have Plaintiff thrown in jail with the ultimate goal of seeking to have Plaintiff removed from office;

9. In 2023, Defendant Tanner began acting outside of her jurisdiction and authority as a District Court Judge to bait Plaintiff into pushing back against her unlawful conduct so that she could accuse Plaintiff of not performing his duties. Said conduct included the following:
 - a. Defendant Tanner began usurping the statutory authority of the duly appointed Chief District Court Judge as specified in N.C. Gen. Stat. § 7A-146(1) by unilaterally scheduling court sessions without legal authority to do so, and demanding that Plaintiff make his deputy clerks available for said unlawful sessions of court. All matters heard and decided during said unlawful sessions of court are null and void, and this may result in an untold number of matters having to be re-heard, and may have dire consequences upon the parties that appeared before the court believing that said sessions were lawful and regular;
 - b. Defendant Tanner repeatedly attempted to access Abuse, Neglect and Dependency files (DSS cases) to which she was not assigned, and which are strictly protected as confidential, and when she was denied access to said files, began to accuse Plaintiff of depriving her of the right to access said files while knowing full well that the same are protected, even from Defendant Tanner;
 - c. In fact, on at least two occasions, Defendant Tanner summoned bailiffs to the Clerk of Court's office to force them to allow her entry into the area whereat the highly confidential and statutorily protected files are kept. This was totally improper, illegal and an abuse of her office as a District Court Judge. It is unknown by Plaintiff exactly which files Defendant Tanner illegally gained access to, but Plaintiff strongly objected to Defendant Tanner's unlawful conduct. It is also unknown how many other times Defendant Tanner gained said illegal access to said confidential files without Plaintiff's knowledge;
 - d. Defendant Tanner attempted to gain access to an area of the Clerk of Court's office whereat monies paid by the general public are processed and kept without any legal or valid reason, and accused the Plaintiff of misconduct when she was denied said requested access;
 - e. Defendant Tanner began usurping the statutory authority of the duly appointed Chief District Court Judge as specified in N.C. Gen. Stat. § 7A-146(3) by attempting to supervise the Plaintiff, when said authority rests solely with the Chief District Court Judge and the Senior Resident Superior Court Judge of Moore County;
 - f. Defendant Tanner, to inflame the entire situation, began to verbally abuse Plaintiff's deputy clerks while they performed their duties while in court with

Defendant Tanner;

- g. Defendant Tanner refused to appear at regularly scheduled court dates as assigned by the Chief District Court Judge, instead handling personal matters to include, *inter alia*, working with the North Carolina Innocence Commission and posting her location on social media knowing full well that the citizens of Moore County were depending upon her to hold court on those dates so that their cases could be heard;
- h. Defendant Tanner began holding court, without jurisdiction or authority, on days that had been assigned to her by the Chief District Court Judge as “chambers days”, which are days she was supposed to be reviewing, approving and signing court orders and performing other administrative tasks as part of her official duties; and
- i. Defendant Tanner, in open court, began berating private attorneys to use other family court mediators instead of the local bar’s preferred mediator so as to unlawfully promote the business of her husband as a mediator and in an effort to strong-arm the local bar to utilize her husband’s services, which as a blatant abuse of Defendant Tanner’s office;

10. Defendant Tanner then attempted to illegally hold Plaintiff in Criminal Contempt of Court despite having no authority to initiate such a proceeding against a fellow elected judicial official;

11. Ultimately, Plaintiff filed a civil action against Defendant Tanner for various causes of action to include for defamation (Moore County File: 23-CVS-1738);

12. The previous civil action was eventually resolved and dismissed, as was the Contempt action against the Plaintiff;

13. As a direct result of Defendant Tanner’s misconduct, the Senior Resident Superior Court Judge Michael A. Stone entered an Administrative Order outlining, *inter alia*, the proper chain of command between the Plaintiff, the Chief District Court Judge, Defendant Tanner and the Senior Resident;

14. Moreover, Defendant Tanner was assigned to hold Court primarily in Hoke County, the other county within her judicial district, for well over one year so that Plaintiff and his staff would not have to interact with her in a professional capacity;

15. Plaintiff had hoped that this would be the end of Defendant Tanner’s smear campaign against him; however, Defendant Tanner has continued on her path to cause harm to the Plaintiff;

16. On December 5th, 2025, Plaintiff filed to run for re-election for Moore County Clerk of Court;

17. On or about December 6th, 2025, Defendant Tanner sent a series of text messages to Senior Resident Superior Court Judge Michael A. Stone, and alleged that: (1) Plaintiff, as the Clerk of Court, had violated N.C. Gen. Stat. § 9-1 et. seq. by failing to initiate the process for a “jury commission” as required by law; and (2) That Plaintiff had requested that the Moore County Board of Commissioners pass a resolution to dissolve the “jury commission” in violation of N.C. Gen. Stat. § 9-1 et. seq. (See Exhibit “1”, which are the actual text messages from Defendant Tanner to Judge Stone);
18. Moreover, Defendant Tanner alleged that said conduct would cause the future juries in Moore County to be “unconstitutional”;
19. Not only were these allegations false, but Defendant Tanner ignored the chain of command in Judge Stone’s prior Administrative Order by going directly to Judge Stone, instead of to her Chief District Court Judge, Don “Skipper” Creed;
20. That night, Judge Stone called Defendant Tanner on the telephone to confirm that it was actually her making these very serious allegations, and to confirm the nature of her allegations, which, upon information and belief, Judge Tanner repeated verbally once again to Judge Stone;
21. As a result, and given the serious nature of the allegations lodged against Plaintiff, Judge Stone launched a full investigation into the matter;
22. Judge Stone concluded, in very short order, after consulting with Plaintiff, the Moore County Commissioners, the properly formed “Jury Commission” and counsel for Moore County, that Judge Tanner’s allegations were completely false and without any merit;
23. Judge Stone asked Plaintiff to simply let Defendant Tanner’s allegations pass without public comment in hopes of keeping the peace between Plaintiff and Defendant Tanner because they are both elected judicial officials and in hopes that Defendant Tanner would recant and apologize to the Plaintiff;
24. However, Defendant Tanner never recanted her allegations, even after they were revealed to be completely false, and apparently repeated those allegations to her friend, Defendant Duerring;
25. Defendant Tanner has harmed the professional reputation of Plaintiff by, once again, falsely alleging that Plaintiff has failed to discharge his professional/statutory duties;
26. Moreover, Defendant Tanner has brought disrepute and dishonor to the entire judicial system by calling into question the jury process in Moore County;
27. Defendant Duerring is running against Plaintiff for Moore County Clerk of Court;

28. On or about January 28th, 2026, Defendant Duerring, during a speech, repeated the exact same false allegations made by Defendant Tanner regarding Plaintiff at a candidates' forum held by the Moore County Republican Women's Club before a large audience that included many elected officials and potential voters;
29. Defendant Duerring knew these allegations were false, or at least should have known these allegations were false;
30. In fact, Defendant Duerring is currently employed as a deputy clerk of court in Chatham County, N.C., and because of this, had the knowledge to allow her to easily verify the veracity of her allegations prior to making them, which she either failed to do, or did do, and chose to defame the Plaintiff anyway;
31. Defendant Duerring has harmed the professional reputation of Plaintiff by falsely alleging that Plaintiff has failed to discharge his professional/statutory duties;

First Claim for Relief – Libel/Slander Per Se (Public Official)

32. Plaintiff incorporates the proceeding paragraphs as if fully set forth herein;
33. Under the well-established common law of North Carolina, libel/slander per se is an oral statement or publication by writing, printing, signs or pictures which, when considered alone without innuendo, colloquium or explanatory circumstances: (1) **charges that a person has committed an infamous crime**; (2) charges a person with having an infectious disease; (3) **tends to impeach a person in that person's trade or profession**; or (4) **otherwise tends to subject one to ridicule, contempt or disgrace**. *Renwick v. News & Observer Publishing Co.*, 310 N.C. 312, 317, 312 S.E.2d 405, 408-09 (1984) (citing *Flake v. Greensboro News Co.*, 212 N.C. 780, 787, 195 S.E. 55, 60 (1937));
34. Defendants' written and oral statements as described above, charged Plaintiff with violating N.C. Gen. Stat. § 9-1 et. seq., impeached Plaintiff in his profession as the Clerk of Court and subjected him to contempt, ridicule and disgrace;
35. Defendants' allegations were completely false;
36. The Defendants either knew their allegations were false or acted with reckless disregard of whether their allegations were false;
37. The Defendants acted with malice, and for personal gain.
38. Defendant Tanner has attempted to smear and defame Plaintiff for almost three years, and Defendant Duerring will apparently say anything, to include outright lies, in hopes of defeating Plaintiff in their election against each other;

39. That Defendants published or spoke their false allegations to other elected officials and to potential voters;
40. Said false allegations have caused harm to the Plaintiff;
41. That Plaintiff is entitled to recover compensatory and punitive damages, jointly and severally, in an amount in excess of \$25,000.00 from the Defendants, as a result of their intentional conduct and for the damages suffered as more particularly described herein;

WHEREFORE, Plaintiff prays the Court grant the following relief:

1. That Plaintiff have and recover a Judgment from all Defendants, jointly and severally, in an amount in excess of \$25,000.00 as compensatory and punitive damages, together with interest as provided for by law;
2. That Plaintiff have and recover attorney fees from Defendants, if appropriate, and as provided for by law;
3. That Plaintiff have a trial by jury on all issues;
4. That the costs of the action be taxed to all Defendants; and
5. That Plaintiff have and recover such further relief as this Court deems just and proper.

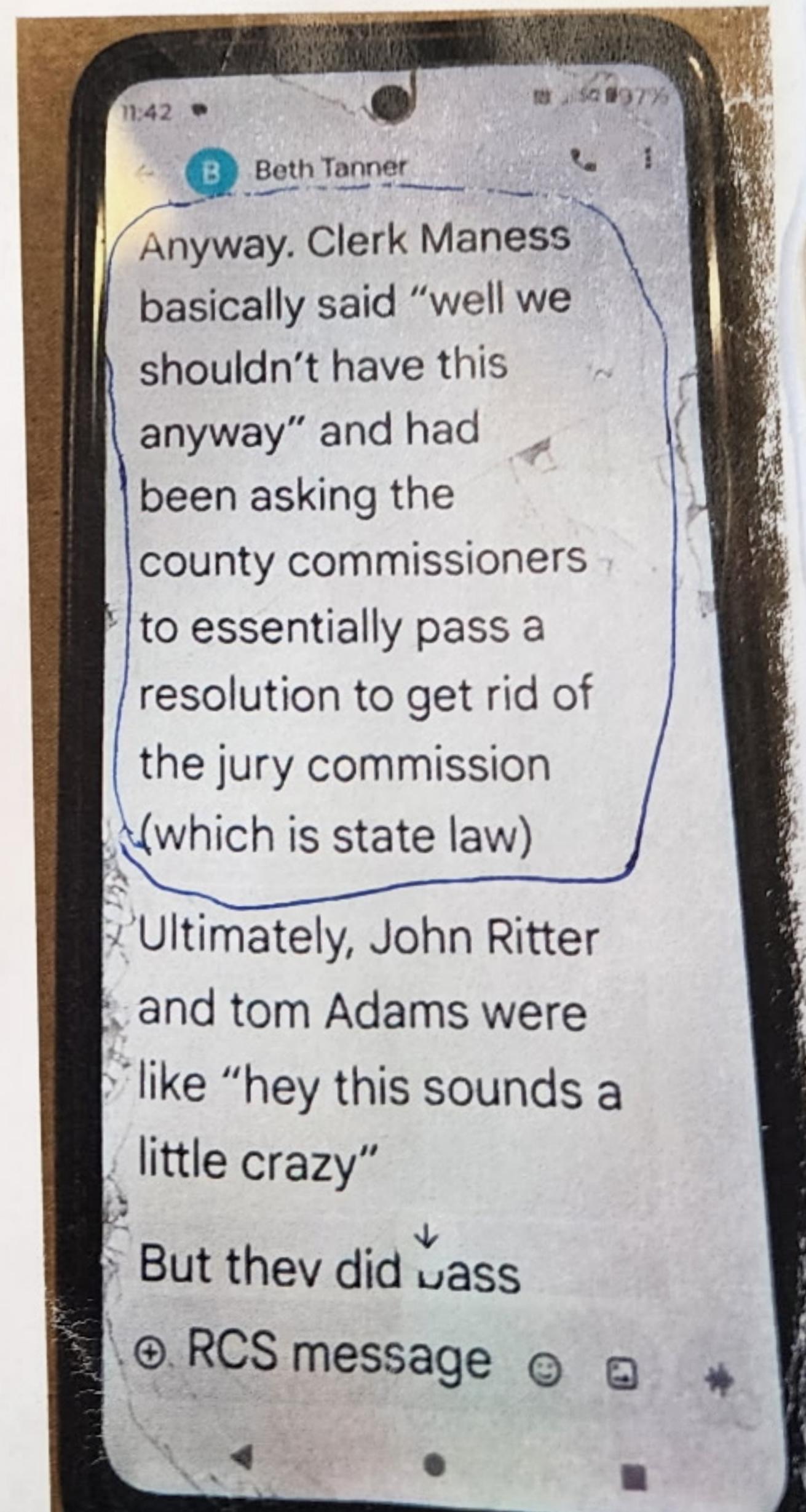
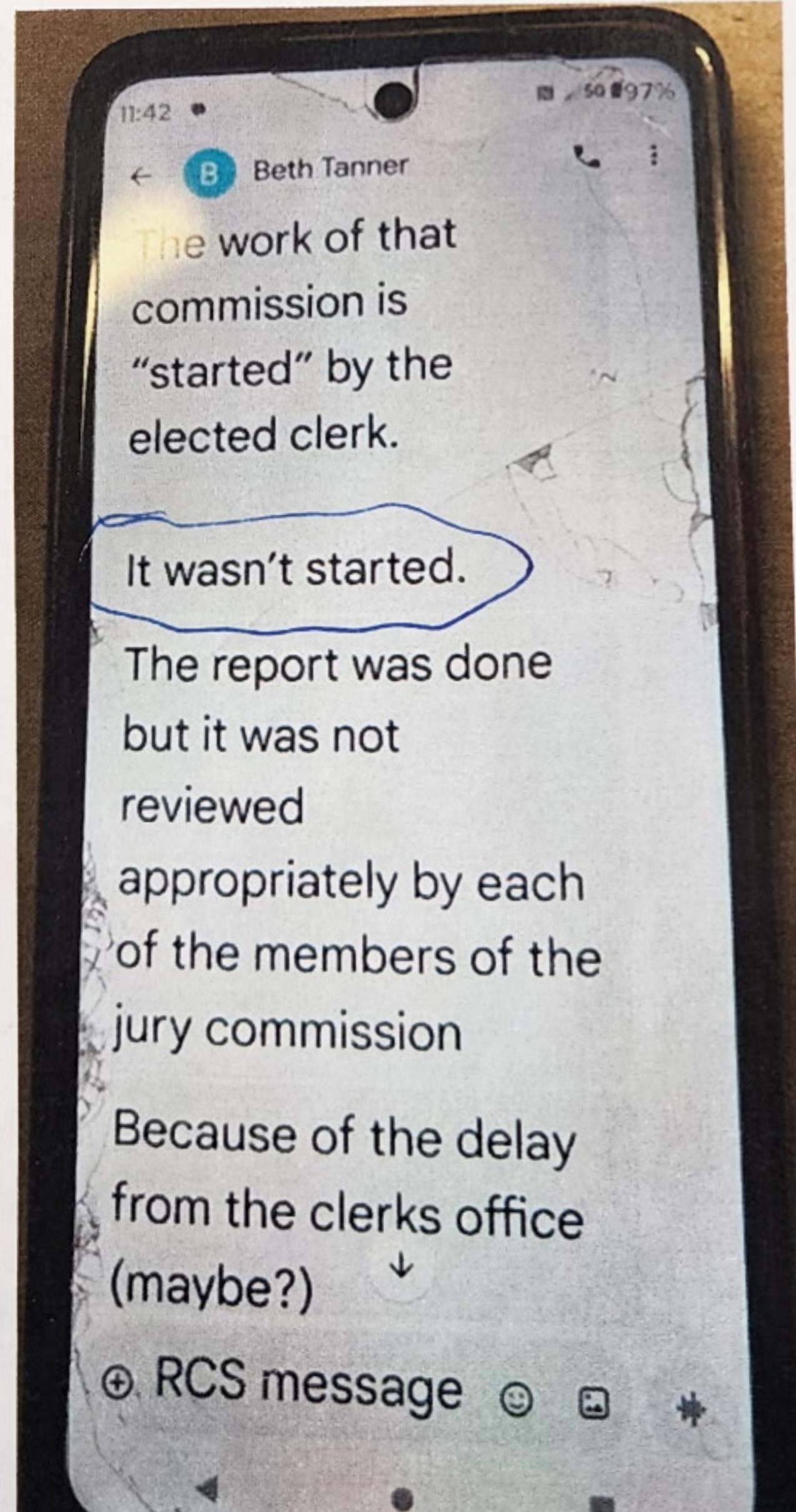
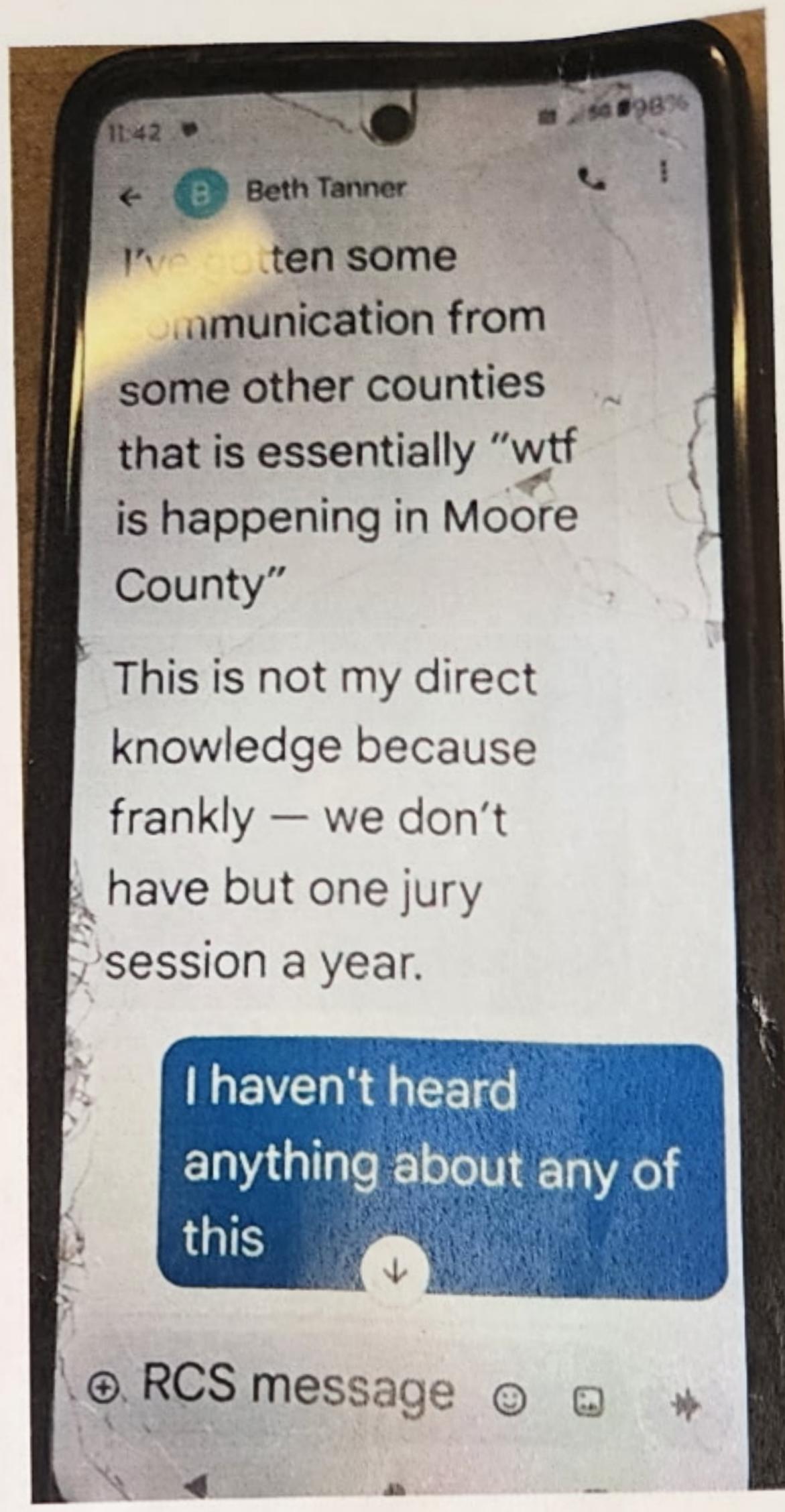
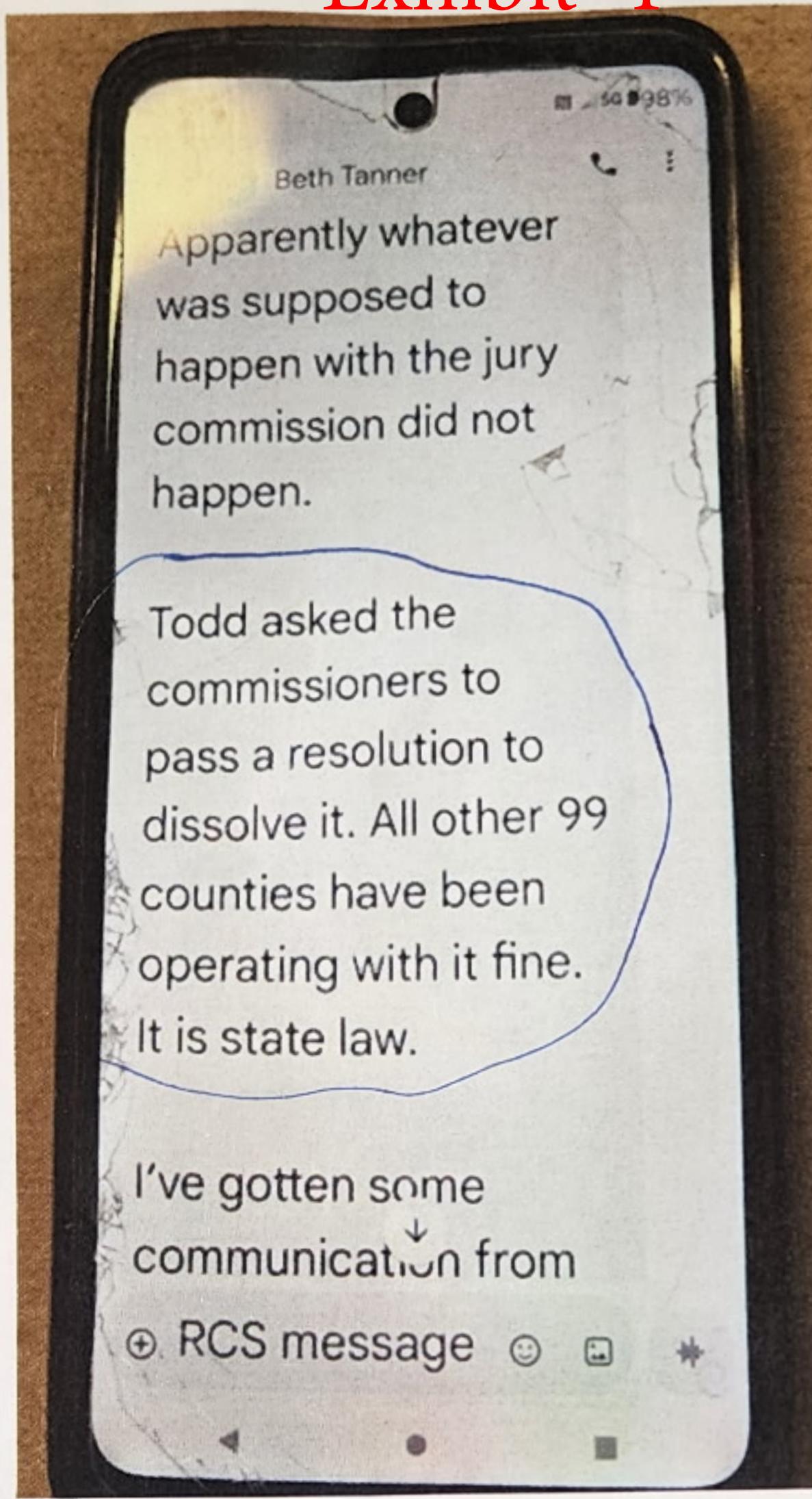
This the 29th day of January, 2026.

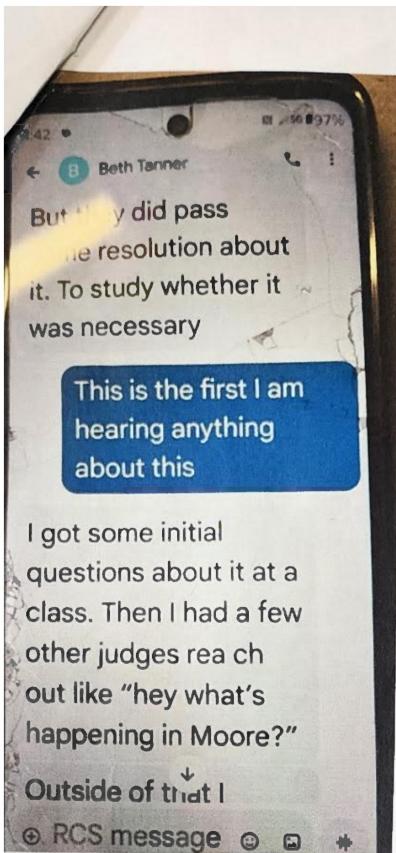
Respectfully Submitted,



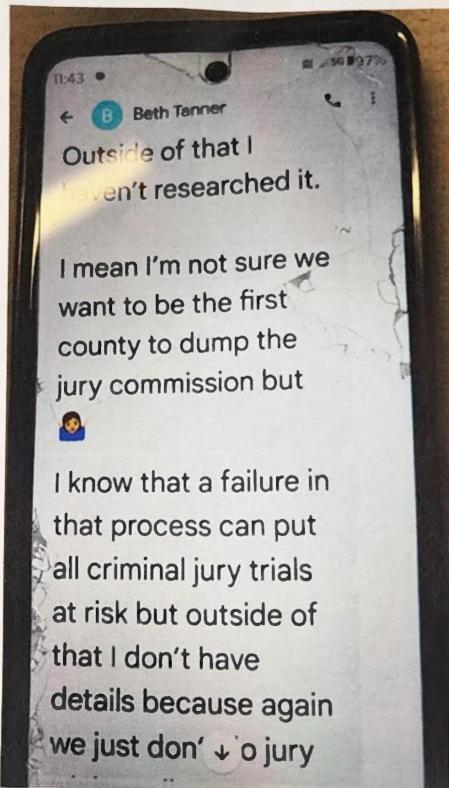
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Exhibit "1"

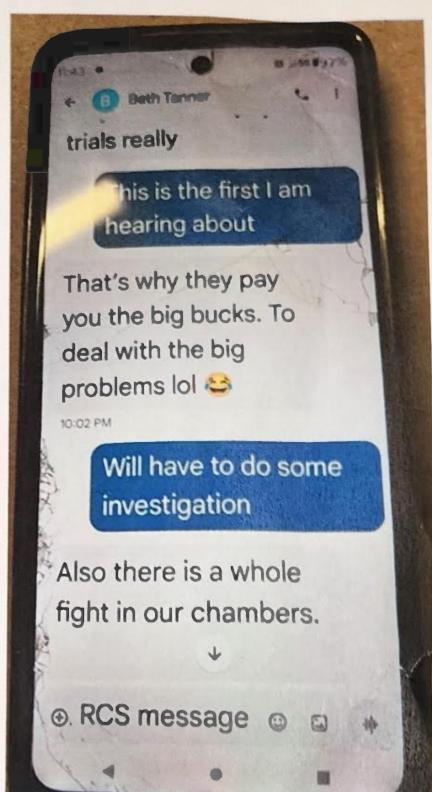




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