

NORTH CAROLINA
GUILFORD COUNTY

FILED

IN THE GENERAL COURT OF JUSTICE
SUPERIOR COURT DIVISION

2014 FEB 12 PM 12:24 CVS 3398

DOUGLAS ADKINS, ISABELLA)
ADKINS, BRETT RIDDLEBERGER,)
JODI RIDDLEBERGER &)
CONSERVATIVES FOR GUILFORD)
COUNTY,)
	Plaintiffs,)
)
vs.)
)
JEFF MARTIN,)
	Defendant.)

COMPLAINT

Plaintiffs, complaining of Defendant, allege and say the following:

1. Plaintiff Douglas Adkins (Doug) is a citizen and resident of Guilford County, North Carolina.
2. Plaintiff Isabella Adkins (Isabella) is a citizen and resident of Guilford County, North Carolina.
3. Plaintiff Brett Riddleberger (Brett) is a citizen and resident of Guilford County, North Carolina.
4. Plaintiff Jodi Riddleberger (Jodi) is a citizen and resident of Guilford County, North Carolina.
5. Plaintiff Conservatives for Guilford County (commonly abbreviated as C4GC) is a political action committee organized and existing under the laws of the State of North Carolina with its principal office located in Guilford County, North Carolina.
6. Upon information and belief, Defendant is a citizen and resident of Guilford County, North Carolina.
7. The individual Plaintiffs, at all times in question herein, have been involved with the Plaintiff C4GC, which endorses conservative candidates running for local and state offices.
8. At all times in question herein, Defendant has hosted and continues to host a blog site, <http://fecundstench.com>, on which he has posted and continues to post false and defamatory blogs about Plaintiffs in an apparent effort to discredit not only the Plaintiffs, but also the political candidates endorsed by C4GC.

9. In numerous blogs posted over time, the most recent being posted on about April 28, 2013, Defendant falsely state that Doug and Isabella “maintain a local empire trading in sex, drugs and violence” and falsely states that the Adkins’ enterprises “. . . have a reputation of being linked to interstate organized crime.” On a blog posted on about May 5, 2013, Defendant falsely states that Doug “. . . beats on women for a living.” In a blog posted on August 29, 2013, referring to C4GC’s celebration of the 50th anniversary of the March on Washington and MLK’s “I have a dream” speech, Defendant falsely states, “Bubba ended the performance with his rendition of Give it 2 U accompanied by the Puerto Rican girls and Isabella Adkins...”

10. In past blogs posted on Defendant’s blog site, with such blogs remaining on Defendant’s blog site, it is falsely stated that Brett suffers from a medical condition known as Erectile Narcolepsy, by which loss of blood to the brain when aroused causes him to lose consciousness. On February 8, 2013, a blog was posted on Defendant’s blog site falsely stating, “Barrett [some blogs refer to Brett as “Barrett”] just fainted” and “It happens frequently,” thus alluding to the earlier blogs regarding Brett’s alleged medical condition. In a blog posted on August 29, 2013, Defendant falsely states, “. . . As everyone left the stage, Brett Riddleberger was seen passed out at a table up front.” In a blog posted on September 1, 2013, Defendant falsely states, “Concord Bridge Consulting is the official think tank for C4GC *and a previous employer of Barrett Riddleberger until his felony conviction for child molesting became public.*” (Emphasis supplied). Numerous earlier blogs still posted on Defendant’s blog site falsely allude to Brett possessing and disseminating child pornography and having sex with ninth-grade girls.

11. On about February 8, 2013, Defendant published on his blog site photographs of Jodi and other women, with the caption falsely stating, “At least one of these women is a stripper.” On or about August 29, 2013, in a blog entitled “Jodi Has a Dream,” Defendant published on his blog site false statements of how, when members of C4GC met at a cantina to celebrate the 50th anniversary of the 1963 March on Washington and MLK’s “I have a dream” speech, there was simulated sexual activity between “the evil Dr. Guarino” and Jodi (who was falsely alleged to be wearing “. . . a silver corset emblazoned with an animal face licking its lips” Continuing on in said blog, Defendant further falsely stated that “. . . Riddleberger [referring to Jodi] stripped to her skivvies.”

12. On September 1, 2013, Defendant published or allowed to be published on his blog site the false statement, “Casting fraudulent votes could very well be the only way Republicans win elections going forward. If anything, they should be encouraging voter fraud and working hard to educate conservatives on ways to cast illegal ballots,” thereby insinuating that C4GC and its members engage in illegal election tactics. On December 15, 2013, Defendant published or allowed to be published on his blog site, “. . . her [referring to Jodi] Tea Party PAC [referring to C4GC] was established by wads of bills still damp from the garters of strippers.”

13. From at least 2011 through the present, Defendant continues to publish or allow to be published on his blog site false statements of a similar nature to those alleged above.

FIRST CLAIM FOR RELIEF – DEFAMATION

14. Plaintiffs reallege the allegations contained in Paragraphs 1-13 of their complaint and incorporate the same by reference as if fully set forth herein.
15. Defendant has published and continues to publish on his blog site false and defamatory statements concerning the Plaintiffs, knowing or having constructive knowledge that said statements were and are false.
16. Such statements were published and are continuing to be published to any and all viewers of <http://fecundstench.com>.
17. Such statements are libelous *per se* in that they allege Plaintiffs have committed infamous crimes, tend to impeach them in their trade or profession of supporting political candidates and/or otherwise subject the Plaintiffs to contempt and disgrace.
18. Plaintiffs have thereby been damaged in an amount in excess of \$10,000.00.

SECOND CLAIM FOR RELIEF – PUNITIVE DAMAGES

19. Plaintiffs reallege the allegations contained in Paragraphs 1-18 of their complaint and incorporate the same by reference as if fully set forth herein.
20. Defendant's publication on its blog site of the false and defamatory material alleged above was and is willful in that it was done and is being done for the deliberate purpose of discrediting them, C4GC and any political candidates it might endorse and done wantonly in that it was done and is being done heedlessly in reckless disregard of Plaintiffs' rights.
21. Plaintiffs are entitled to recover punitive damages under Chapter 1D of the North Carolina General Statutes because Defendant's willful and wanton conduct was and is related to the injury for which compensatory damages should be awarded.

WHEREFORE, Plaintiffs pray the Court as follows:

1. Plaintiffs have and recover of Defendant judgment in an amount in excess of \$10,000.00 in compensatory damages under FIRST CLAIM FOR RELIEF.
2. Plaintiffs have and recover of Defendant judgment in an amount in excess of \$10,000.00 in punitive damages under SECOND CLAIM FOR RELIEF.
3. The costs of this action be taxed to the Defendant.
4. A jury trial be had on all issues raised in the pleadings herein.

5. The Court grant Plaintiffs such other and further relief as it may deem appropriate.

JURY TRIAL DEMANDED

This 20 day of January, 2014.



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