

## AFFIDAVIT OF SERVICE

State of South Carolina

County of Horry

Magistrate Court

Case Number: 2025-CV-26-1090089

Plaintiff:

**John Paul Miller**

vs.

Defendant:

**Melissa Pfeiffer**

For:

John Paul Miller  
4869 Hwy 17 Bypass  
Myrtle Beach, SC 29577

Received by VPS Solutions, LLC to be served on **Melissa Pfeiffer**, [REDACTED] **Beach, SC 29588**.

MYRTLE BEACH  
MAGISTRATES OFFICE  
2025 JAN 27 AM 11:47  
DISTRICT #6


I, Anthony Marlowe, being duly sworn, depose and say that on the **16th day of January, 2025** at **12:40 pm**, I:

**INDIVIDUALLY/PERSONALLY** served by delivering a true copy of the **Summons and Complaint, Affidavit and Itemization of Accounts, Instructions for Defendant, Form Answer** with the date and hour of service endorsed thereon by me, to: **Melissa Pfeiffer** at the address of: [REDACTED] **Myrtle Beach, SC 29588**, and informed said person of the contents therein, in compliance with state statutes.

**Military Status:** Based upon inquiry of party served, Defendant is not in the military service of the United States of America.

**Marital Status:** Based upon inquiry of party served, Defendant is not married.

I certify that I am over the age of 18, have no interest in the above action, and am in good standing, in the judicial circuit in which the process was served.

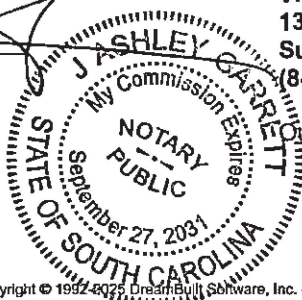
  
\_\_\_\_\_  
Anthony Marlowe  
Process Server

Subscribed and Sworn to before me on the 16th day of January, 2025 by the affiant who is personally known to me.

  
NOTARY PUBLIC

VPS Solutions, LLC  
1318 N Main St #1445  
Summerville, SC 29483  
(843) 817-3886

Our Job Serial Number: VPL-2025000088



STATE OF SOUTH CAROLINA

COUNTY OF HORRY

2025CV261090089  
CIVIL CASE NUMBER

IN THE MAGISTRATE'S COURT

SUMMONS

John Paul Miller  
4869 hwy 17 bypass  
Myrtle Beach, SC 29577

PLAINTIFF(S)

Vs

Melissa Pfeiffer  
[REDACTED]  
Myrtle Beach, SC 29588  
DEFENDANT(S)

TO THE DEFENDANT(S) NAMED ABOVE:

**YOU ARE SUMMONED** and required to answer the allegations of the attached complaint and present any appropriate counterclaims/crossclaims to the attached Complaint within THIRTY days from the first day after receipt of this summons. Your Answer must be received by the:

Myrtle Beach Magistrate Court  
1201 21st Avenue North  
Myrtle Beach, SC 29577  
Phone: (843) 915-5293  
Fax: (843) 444-6131

If you fail to answer within the prescribed time, a judgment by default may be rendered against you for the amount or other remedy requested in the attached complaint, plus interest and costs. **If you desire a jury trial, you must request one in writing at least five (5) working days prior to the date set for trial.** If no jury trial is timely requested, the matter will be heard and decided by the Judge.

Given under my hand:

\_\_\_\_\_  
JUDGE

**READ ATTACHED INSTRUCTIONS CAREFULLY**

January 10, 2025

2025CNJ61090089

CIVIL CASE NUMBER

STATE OF SOUTH CAROLINA )

COUNTY OF HORRY )

JOHN PAUL MILLER )

PLAINTIFF )

STREET ADDRESS )

CITY, STATE ZIP )

TELEPHONE )

VS. )

MELISSA PFEIFFER )

DEFENDANT(S) )

STREET ADDRESS )

Myrtle Beach, SC 29588 )

CITY, STATE ZIP )

TELEPHONE )

IN THE MAGISTRATE'S COURT

COMPLAINT

I, John Paul Miller, the plaintiff in this civil action do make the following claims:

1. I believe the defendant, Melissa Pfeiffer, is a resident of Horry County, and resides at [REDACTED], Myrtle Beach, SC 29588 which is within Judge Arakas's magisterial jurisdiction or this Complaint is properly filed in Horry County.

2. I make this complaint on the following:

**See Attached Facts and Causes of Action** (Attach supplement if necessary)

3. I believe, because of the above information, that I am entitled to and do request a judgment for **\$7,500.00** and/or other relief as below requested:

**Damages not to exceed Seven Thousand Five Hundred**

including any costs resulting in this action.

I state under penalty of perjury that the above is correct and truthful, except those based on my information and belief.

Dated: January 10, 2025

[Signature]  
Signature of Plaintiff (or his attorney)

## **SUPPLEMENT TO PLAINTIFF'S COMPLAINT**

### **FACTS COMMON TO ALL COUNTS**

1. Defendant has engaged in a persistent pattern of harassment against Plaintiff, including screaming and demonstrating against Plaintiff's mere existence in public locations throughout Horry County.

2. During these encounters, Defendant regularly screams and yells at Plaintiff in public, videos him with her phone, and posts videos or comments about Plaintiff on social media, all of which cause Plaintiff severe emotional distress and public humiliation.

3. Defendant claims to be the leader of demonstrations, which she refers to as "Justice for Mica" rallies, where mobs of people scream and shout against Plaintiff for having the temerity to live and function and attempt to work in Horry County.

4. Though Defendant refers to the rallies as "protests", they are anything but legitimate and do nothing to protest anything other than Plaintiff's existence. In fact, the "rallies" are nothing more than poorly organized mobs harassing and stalking the Plaintiff and others.

5. During the "rallies" Defendant holds signs and screams accusations that Plaintiff is guilty of crimes and nefarious conduct without basis in fact or law.

6. During a baptism on the beach in Myrtle Beach, Defendant screamed at Plaintiff and churchgoers about Plaintiff and alleged conduct. Defendant screamed offensive statements about the Defendant in the face of a child who was trying to get baptized.

7. Defendant's conduct is intended to harm Plaintiff and enrich Defendant through monetizing social media accounts, channels, and platforms.

8. Much of Defendant's conduct is carried out under the guise that she is protesting domestic violence, a crime that Plaintiff was never charged with committing and for which there is no factual basis.

9. The interest that a subset of people have in Plaintiff, and in the life of his late wife, was created entirely by Defendant and others like her who have determined on their own that Plaintiff is guilty of a crime that law enforcement officials have cleared him of or never charged him with committing.

10. Defendant has published false and defamatory statements about Plaintiff on various social media platforms, including Facebook and Tiktok, with the intent to damage Plaintiff's reputation and interfere with his ministry.

11. Defendant's actions have been calculated to intimidate Plaintiff from appearing in public and conducting his normal activities, including the operation of his church.

12. Defendant's actions have been calculated to intimidate or influence others from congregating at Plaintiff's church or with Plaintiff in any setting.

13. Defendant's harassment and intimidation of Plaintiff and those associated with him have interfered with Plaintiff's ability to live his life without interference from Defendant or others who are influenced by Defendant's actions.

14. As a direct result of Defendant's actions, friends and acquaintances of Plaintiff have expressed reluctance to be seen with Plaintiff or to do business with Plaintiff or his affiliated companies.

15. Defendant's harassment and intimidation of Plaintiff and those associated with him have interfered with Plaintiff's ability to earn a living, conduct church services, minister to his

congregation, and maintain relationships with church members and the broader religious community.

16. As a direct result of the Defendant's actions, multiple church members have expressed reluctance to attend services and baptisms, and attendance and participation have declined.

17. Defendant's actions have created a dangerous environment for Plaintiff, placing him in fear for his safety and the safety of others.

18. Nothing being posted or stated about Plaintiff by Defendant is newsworthy or in the public interest.

**AS AND FOR A FIRST CAUSE OF ACTION**  
(Invasion of Privacy)

19. Plaintiff incorporates by reference all preceding paragraphs as if fully set forth herein.

20. Defendant engaged in a pattern of intentional, substantial, and unreasonable intrusion upon Plaintiff's life.

21. Defendant's actions served no legitimate purpose and would have caused a reasonable person to suffer substantial emotional distress.

22. Defendant intentionally intruded upon Plaintiff's private affairs and concerns.

23. The intrusion would be highly offensive to a reasonable person.

24. Defendant engaged in a pattern of words and conduct that served no legitimate purpose and caused Plaintiff to reasonably fear for his safety or suffer substantial emotional distress.

25. Defendant's conduct constitutes the unwarranted appropriation or exploitation of Plaintiff's personality and private affairs, with which the public has no legitimate concern, or the

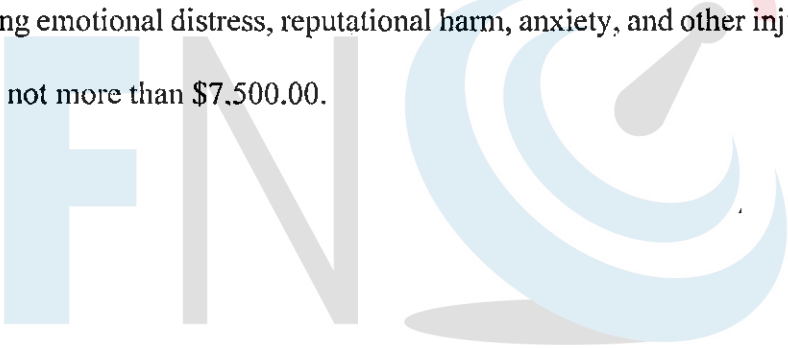
wrongful intrusion into Plaintiff's private activities in such a manner as to outrage or cause mental suffering, shame, or humiliation to a person of ordinary sensibilities.

26. Defendant invaded Plaintiff's right to privacy in one or more of the following ways: wrongfully appropriating Plaintiff's personality; publicizing the Plaintiff's private affairs, which have no legitimate public concern; or wrongfully intruding into Plaintiff's private affairs.

27. Defendant's actions also violated South Carolina criminal statutes prohibiting harassment and stalking.

28. Law enforcement officers have refused to enforce criminal statutes enacted to protect people like the Plaintiff, leaving Plaintiff no choice but to bring this action.

29. As a direct and proximate result of Defendant's actions, Plaintiff has suffered damages, including emotional distress, reputational harm, anxiety, and other injuries, in an amount to be proven, but not more than \$7,500.00.

A large, light blue watermark logo is centered on the page. It consists of the letters 'FNC' in a bold, sans-serif font, followed by a stylized circular graphic element that resembles a target or a swirl.

2025 CV 261090088

CIVIL CASE NUMBER

STATE OF SOUTH CAROLINA )

COUNTY OF HORRY )

JOHN PAUL MILLER )

PLAINTIFF(S) )

VS. )

MELISSA PFEIFFER )

DEFENDANT(S). )

IN THE MAGISTRATE'S COURT

AFFIDAVIT AND ITEMIZATION  
OF ACCOUNTS

Plaintiff, JOHN PAUL MILLER, personally appearing before me, who, being duly sworn, states that he is the plaintiff in this action, and that the itemization of accounts which follows is true and correct.

He further states that no part of the sum included in the itemization below has been paid or satisfied in any fashion, and is today due and owed to him.

ITEMIZATION OF ACCOUNTS

LOSS OF INCOME

\$7500

\$  
\$  
\$  
\$

TOTAL

\$7,500.00

(Copies of bills, papers or other proof of any of the above accounts should be attached to this document.)

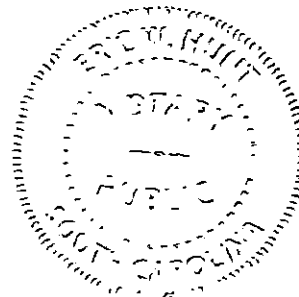
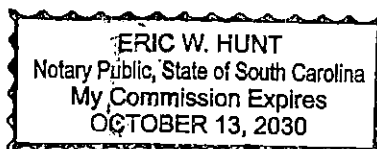
Sworn to and Subscribed before me  
this 10th day of January, 2025.

Magistrate or Notary Public for South Carolina

My Commission expires

10-13-2030

PLAINTIFF (or his attorney)





HORRY COUNTY  
MYRTLE BEACH SUMMARY COURT

CASE INFORMATION SHEET

CIVIL LAWSUIT

DATE FILED: 1-10-25

PLAINTIFF (YOU)

NAME/ADDRESS: \_\_\_\_\_

HOME PHONE: \_\_\_\_\_

John-Paul Miller

EMPLOYER: \_\_\_\_\_

4869 Highway 17 bypass

FAX# \_\_\_\_\_

MB SC 29577

WORK PHONE: \_\_\_\_\_

ATTORNEY: \_\_\_\_\_

CELL PHONE: \_\_\_\_\_

DEFENDANT (THEM)

NAME/ADDRESS \_\_\_\_\_

HOME PHONE: \_\_\_\_\_

Melissa Pfeiffer

EMPLOYER: \_\_\_\_\_

MB SC 29588

FAX # \_\_\_\_\_

WORK PHONE: \_\_\_\_\_

ATTORNEY: \_\_\_\_\_

CELL PHONE: \_\_\_\_\_

Amount of Suit: \$ 7500<sup>00</sup>

(Maximum \$7500)

\*\*\* RETURN THIS AND ALL ATTACHED FORMS TO THE CIVIL CLERK \*\*\*

Myrtle Beach Magistrate  
1201 21<sup>st</sup> Avenue North  
Myrtle Beach, SC 29577  
843-915-5293

STATE OF SOUTH CAROLINA

COUNTY OF HORRY

2025CV261090090  
CIVIL CASE NUMBER

IN THE MAGISTRATE'S COURT

SUMMONS

John Paul Miller  
4869 hwy 17 bypass  
Myrtle Beach, SC 29577

PLAINTIFF(S)

Vs

Jan G Lancaster  
[REDACTED]  
Myrtle Beach, SC 29577  
DEFENDANT(S)

TO THE DEFENDANT(S) NAMED ABOVE:

**YOU ARE SUMMONED** and required to answer the allegations of the attached complaint and present any appropriate counterclaims/crossclaims to the attached Complaint within THIRTY days from the first day after receipt of this summons. Your Answer must be received by the:

Myrtle Beach Magistrate Court  
1201 21st Avenue North  
Myrtle Beach, SC 29577  
Phone: (843) 915-5293  
Fax: (843) 444-6131

If you fail to answer within the prescribed time, a judgment by default may be rendered against you for the amount or other remedy requested in the attached complaint, plus interest and costs. **If you desire a jury trial, you must request one in writing at least five (5) working days prior to the date set for trial.** If no jury trial is timely requested, the matter will be heard and decided by the Judge.

Given under my hand:

\_\_\_\_\_  
JUDGE

**READ ATTACHED INSTRUCTIONS CAREFULLY**

January 10, 2025

202501261090096

CIVIL CASE NUMBER

STATE OF SOUTH CAROLINA

COUNTY OF HORRY

JOHN PAUL MILLER

PLAINTIFF

STREET ADDRESS

CITY, STATE ZIP

TELEPHONE

VS.

JAN G. LANCASTER

DEFENDANT(S)

STREET ADDRESS

Myrtle Beach, SC 29588

CITY, STATE ZIP

TELEPHONE

IN THE MAGISTRATE'S COURT

COMPLAINT

I, John Paul Miller, the plaintiff in this civil action do make the following claims:

1. I believe the defendant, Jan G. Lancaster, is a resident of Horry County, and resides at [REDACTED] Myrtle Beach, SC 29588 which is within Judge Arakas's magisterial jurisdiction or this Complaint is properly filed in Horry County.

2. I make this complaint on the following:

**See Attached Facts and Causes of Action** (Attach supplement if necessary)

3. I believe, because of the above information, that I am entitled to and do request a judgment for \$7,500.00 and/or other relief as below requested:

**Damages not to exceed Seven Thousand Five Hundred**

including any costs resulting in this action.

I state under penalty of perjury that the above is correct and truthful, except those based on my information and belief.

Dated: January 10, 2025

[Signature]  
Signature of Plaintiff (or his attorney)

## **SUPPLEMENT TO PLAINTIFF'S COMPLAINT**

### **FACTS COMMON TO ALL COUNTS**

1. Defendant has engaged in a persistent pattern of harassment against Plaintiff, including following him to his place of business and other public locations throughout Horry County.

2. During these encounters, Defendant regularly screams and yells at Plaintiff in public, videos him with his phone, and posts videos and comments about Plaintiff on social media, all of which causes Plaintiff severe emotional distress and public humiliation.

3. Defendant's videos and written posts accuse Plaintiff of crimes and nefarious conduct without basis in fact or law.

4. Defendant's conduct is intended to harm Plaintiff and enrich Defendant through monetizing social media accounts, channels, and platforms.

5. Now or previously, Defendant waits outside of Plaintiff's home at various times during the day and follows Plaintiff to work, church – where Plaintiff is a pastor, or any social activity.

6. Defendant videos Plaintiff while hiding in shrubbery near Plaintiff's home.

7. Defendant has posted pictures of Plaintiff's vehicle, Plaintiff's license plate, Plaintiff's home, and Plaintiff's work on social media and without Plaintiff's request or consent.

8. The interest that a subset of people have in Plaintiff, and in the life of his late wife, was created entirely by Defendant and others like her who have determined on their own that Plaintiff is guilty of a crime that law enforcement officials have cleared him of or never charged him with committing.

9. Much of Defendant's conduct is carried out under Defendant's unfounded claim that he is a member of the "media" and that he is telling a news story.

10. Defendant's conduct is not indicative of media members and does not serve a journalistic purpose.

11. Defendant is not employed by a media company and is actually an iPhone repairman who calls himself "Thee iPhone Guru".

12. Defendant has published false and defamatory statements about Plaintiff on various social media platforms, including Facebook and Tiktok, with the intent to damage Plaintiff's reputation and interfere with his ministry.

13. Defendant's actions have been calculated to intimidate Plaintiff from appearing in public and conducting his normal activities, including the operation of his church.

14. Defendant's actions have been calculated to intimidate or influence others from congregating at Plaintiff's church or with Plaintiff in any setting.

15. Defendant claims to participate in and video "protests," although the gatherings of people are not actual protests but are rather demonstrations of others engaged in the harassment and stalking of Plaintiff and others.

16. Defendant's harassment and intimidation have interfered with Plaintiff's ability to live his life without interference from Defendant or others who are influenced by Defendant's actions.

17. As a direct result of Defendant's actions, friends and acquaintances of Plaintiff have expressed reluctance to be seen with Plaintiff or to do business with Plaintiff or his affiliated companies.

18. The Defendant's harassment and intimidation have interfered with the Plaintiff's ability to conduct church services, minister to his congregation, and maintain relationships with church members and the broader religious community.

19. As a direct result of the Defendant's actions, multiple church members have expressed reluctance to attend services, and attendance and participation have declined.

20. Defendant's actions have created a dangerous environment for Plaintiff, placing him in fear for himself and others.

21. Plaintiff obtained a restraining order against Defendant, which Defendant has ignored and violated.

22. Defendant admitted under oath that he previously attempted to extort the Plaintiff.

23. Nothing being posted by Defendant is newsworthy in the public interest.

**AS AND FOR A FIRST CAUSE OF ACTION**  
(Invasion of Privacy)

24. Plaintiff incorporates by reference all preceding paragraphs as if fully set forth herein.

25. Defendant engaged in a pattern of intentional, substantial, and unreasonable intrusion upon Plaintiff's life.

26. Defendant's actions served no legitimate purpose and would have caused a reasonable person to suffer substantial emotional distress.

27. Defendant intentionally intruded upon Plaintiff's private affairs and concerns.

28. The intrusion would be highly offensive to a reasonable person.

29. Defendant engaged in a pattern of words and conduct that served no legitimate purpose and caused Plaintiff to reasonably fear for his safety or suffer substantial emotional distress.

30. Defendant's conduct constitutes the unwarranted appropriation or exploitation of Plaintiff's personality and private affairs, with which the public has no legitimate concern, or the wrongful intrusion into Plaintiff's private activities, in such a manner as to outrage or cause mental suffering, shame, or humiliation to a person of ordinary sensibilities.

31. Defendant invaded Plaintiff's right to privacy in one or more of the following ways: wrongfully appropriating Plaintiff's personality; publicizing the Plaintiff's private affairs, which have no legitimate public concern; or wrongfully intruding into Plaintiff's private affairs.

32. Defendant's actions also violated South Carolina criminal statutes prohibiting harassment and stalking.

33. Law enforcement officers have refused to enforce criminal statutes enacted to protect people like the Plaintiff, leaving Plaintiff no choice but to bring this action.

34. As a direct and proximate result of Defendant's actions, Plaintiff has suffered damages, including emotional distress, reputational harm, anxiety, and other injuries, in an amount to be proven, but not more than \$7,500.00.

2025CV261090080

CIVIL CASE NUMBER

STATE OF SOUTH CAROLINA )

COUNTY OF HORRY )

JOHN PAUL MILLER )

PLAINTIFF(S) )

VS. )

JAN G. LANCASTER )

DEFENDANT(S). )

IN THE MAGISTRATE'S COURT

AFFIDAVIT AND ITEMIZATION  
OF ACCOUNTS

Plaintiff, JOHN PAUL MILLER, personally appearing before me, who, being duly sworn, states that he is the plaintiff in this action, and that the itemization of accounts which follows is true and correct.

He further states that no part of the sum included in the itemization below has been paid or satisfied in any fashion, and is today due and owed to him.

ITEMIZATION OF ACCOUNTS

LOSS OF INCOME	\$7500
	\$
	\$
	\$
	\$
TOTAL	<u>\$7,500.00</u>

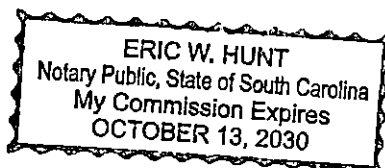
(Copies of bills, papers or other proof of any of the above accounts should be attached to this document.)

Sworn to and Subscribed before me  
this 10<sup>th</sup> day of January, 2025.

[Signature]  
Magistrate or Notary Public for South Carolina

My Commission expires 10-13-2026

[Signature]  
PLAINTIFF (or his attorney)





HORRY COUNTY  
MYRTLE BEACH SUMMARY COURT

CASE INFORMATION SHEET

CIVIL LAWSUIT

DATE FILED: 1-10-25

PLAINTIFF (YOU)

NAME/ADDRESS: John-Paul Miller HOME PHONE: \_\_\_\_\_  
4869 Highway 17 bypass EMPLOYER: \_\_\_\_\_  
MB SC 29577 FAX# \_\_\_\_\_  
WORK PHONE: \_\_\_\_\_  
ATTORNEY: \_\_\_\_\_ CELL PHONE: \_\_\_\_\_

DEFENDANT (THEM)

NAME/ADDRESS: Tim G. Lancaster HOME PHONE: \_\_\_\_\_  
[REDACTED] EMPLOYER: \_\_\_\_\_  
MB SC 29588 FAX # \_\_\_\_\_  
WORK PHONE: \_\_\_\_\_  
ATTORNEY: \_\_\_\_\_ CELL PHONE: \_\_\_\_\_

Amount of Suit: \$ 7500<sup>00</sup>  
(Maximum \$7500)

\*\*\* RETURN THIS AND ALL ATTACHED FORMS TO THE CIVIL CLERK \*\*\*

Myrtle Beach Magistrate  
1201 21<sup>st</sup> Avenue North  
Myrtle Beach, SC 29577  
843-915-5293

STATE OF SOUTH CAROLINA )

COUNTY OF HORRY )

2025CV261090091  
CIVIL CASE NUMBER  
IN THE MAGISTRATE'S COURT  
SUMMONS

John Paul Miller  
4869 hwy 17 bypass  
Myrtle Beach, SC 29577

---

PLAINTIFF(S)

Vs

Kenn Young  
[REDACTED]  
Myrtle Beach, SC 29577

---

DEFENDANT(S)

**TO THE DEFENDANT(S) NAMED ABOVE:**

**YOU ARE SUMMONED** and required to answer the allegations of the attached complaint and present any appropriate counterclaims/crossclaims to the attached Complaint within THIRTY days from the first day after receipt of this summons. Your Answer must be received by the:

Myrtle Beach Magistrate Court  
1201 21st Avenue North  
Myrtle Beach, SC 29577  
Phone: (843) 915-5293  
Fax: (843) 444-6131

If you fail to answer within the prescribed time, a judgment by default may be rendered against you for the amount or other remedy requested in the attached complaint, plus interest and costs. **If you desire a jury trial, you must request one in writing at least five (5) working days prior to the date set for trial.** If no jury trial is timely requested, the matter will be heard and decided by the Judge.

Given under my hand:

\_\_\_\_\_  
JUDGE

**READ ATTACHED INSTRUCTIONS CAREFULLY**

January 10, 2025

2025 CV061090091  
CIVIL CASE NUMBER

STATE OF SOUTH CAROLINA )  
COUNTY OF HORRY )  
JOHN PAUL MILLER )  
PLAINTIFF )  
STREET ADDRESS )  
CITY, STATE ZIP )  
TELEPHONE )  
VS. )  
KENN YOUNG )  
DEFENDANT(S) )  
[REDACTED] )  
STREET ADDRESS )  
Myrtle Beach, SC 29577 )  
CITY, STATE ZIP )  
TELEPHONE )

IN THE MAGISTRATE'S COURT

COMPLAINT

I, John Paul Miller, the plaintiff in this civil action do make the following claims:

1. I believe the defendant, Kenn Young, is a resident of Horry County, and resides at [REDACTED] Myrtle Beach SC 29577 which is within Judge Arakas's magisterial jurisdiction or this Complaint is properly filed in Horry County.

2. I make this complaint on the following:

**See Attached Facts and Causes of Action** (Attach supplement if necessary)

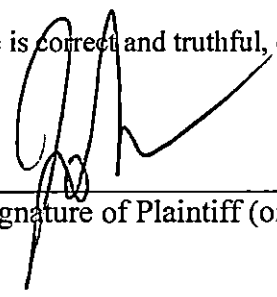
3. I believe, because of the above information, that I am entitled to and do request a judgment for **\$7,500.00** and/or other relief as below requested:

**Damages not to exceed Seven Thousand Five Hundred**

including any costs resulting in this action.

I state under penalty of perjury that the above is correct and truthful, except those based on my information and belief.

Dated: January 10, 2025

  
\_\_\_\_\_  
Signature of Plaintiff (or his attorney)

## **SUPPLEMENT TO PLAINTIFF'S COMPLAINT**

### **FACTS COMMON TO ALL COUNTS**

1. Defendant has engaged in a persistent pattern of harassment against Plaintiff, including posting statements and videos on social media about Plaintiff, which are intended to paint Plaintiff in a false light and like a villain or criminal.

2. Defendant claims to have started a Facebook page called "Justice for Mica" in support of Plaintiff's late wife, who Defendant claims to be a victim of domestic violence. Defendant's posts about Plaintiff infer that Plaintiff is a domestic abuser and accuses Plaintiff of murdering his late wife.

3. Defendant does not promote justice for anyone. In fact, Defendant only harasses and stalks Plaintiff and accuses Plaintiff of criminal activity.

4. Defendant posts statements and videos about Plaintiff where he describes him as an abuser, a narcissist, corrupt, and a criminal, and Plaintiff's late wife to a victim of his abuse.

5. Defendant's conduct is intended to harm Plaintiff and enrich Defendant through publicity and fame in a group of like-minded stalkers and through the monetization of social media accounts, channels, and platforms.

6. Plaintiff was never charged with committing domestic violence and law enforcement officials determined that he had no part in the death of his ex-wife.

7. The interest that a subset of people have in Plaintiff, and in the life of his late wife, was created entirely by Defendant and others like him who have determined on their own that Plaintiff is guilty of a crime that law enforcement officials have cleared him of or never charged him with committing.

8. Defendant has published false and defamatory statements about Plaintiff on various social media platforms, including Facebook, to damage Plaintiff's reputation and interfere with his livelihood and ministry.

9. Defendant's actions have been calculated to intimidate Plaintiff from appearing in public and conducting his normal daily activities, including the operation of his church.

10. Defendant's actions have been calculated to intimidate or influence others from congregating at Plaintiff's church or with Plaintiff in any setting.

11. Defendant's harassment and intimidation of Plaintiff and those associated with him have interfered with Plaintiff's ability to live his life without interference from Defendant or others who are influenced by Defendant's actions.

12. As a direct result of Defendant's actions, friends and acquaintances of Plaintiff have expressed reluctance to be seen with Plaintiff or to do business with Plaintiff or his affiliated companies.

13. Defendant's harassment and intimidation of Plaintiff and those associated with him have interfered with Plaintiff's ability to earn a living, conduct church services, minister to his congregation, and maintain relationships with church members and the broader religious community.

14. As a direct result of the Defendant's actions, multiple church members have expressed reluctance to attend services and baptisms, and attendance and participation have declined.

15. Defendant's actions have created a dangerous environment for Plaintiff, who fears for his safety and the safety of others.

16. Nothing being posted or stated about Plaintiff by Defendant is newsworthy or in the public interest.

**AS AND FOR A FIRST CAUSE OF ACTION**  
(Invasion of Privacy)

17. Plaintiff incorporates by reference all preceding paragraphs as if fully set forth herein.

18. Defendant engaged in a pattern of intentional, substantial, and unreasonable intrusion upon Plaintiff's life.

19. Defendant's actions served no legitimate purpose and would have caused a reasonable person to suffer substantial emotional distress.

20. Defendant intentionally intruded upon Plaintiff's private affairs and concerns.

21. Defendant has appropriated Plaintiff's name and image to promote Defendant's social media accounts and pages for Defendant's benefit.

22. The intrusions would be highly offensive to a reasonable person.

23. Defendant engaged in a pattern of words and conduct that served no legitimate purpose and caused Plaintiff to reasonably fear for his safety or suffer substantial emotional distress.

24. Defendant's conduct constitutes the unwarranted appropriation or exploitation of Plaintiff's personality or private affairs, with which the public has no legitimate concern, or the wrongful intrusion into Plaintiff's private activities in such a manner as to outrage or cause mental suffering, shame, or humiliation to a person of ordinary sensibilities.

25. Defendant invaded Plaintiff's right to privacy in one or more of the following ways: wrongfully appropriating Plaintiff's personality, publicizing Plaintiff's private affairs, which have no legitimate public concern, or wrongfully intruding into Plaintiff's private affairs.

26. Defendant's actions also violated South Carolina criminal statutes prohibiting harassment and stalking.

27. Law enforcement officers have refused to enforce criminal statutes enacted to protect people like the Plaintiff, leaving Plaintiff no choice but to bring this action.

28. As a direct and proximate result of Defendant's actions, Plaintiff has suffered damages, including emotional distress, reputational harm, anxiety, and other injuries, in an amount to be proven, but not more than \$7,500.00.



2025 CV 6109 0091

CIVIL CASE NUMBER

STATE OF SOUTH CAROLINA )

COUNTY OF HORRY )

JOHN PAUL MILLER )

PLAINTIFF(S) )

VS. )

KENN YOUNG )

DEFENDANT(S). )

IN THE MAGISTRATE'S COURT

AFFIDAVIT AND ITEMIZATION  
OF ACCOUNTS

Plaintiff, JOHN PAUL MILLER, personally appearing before me, who, being duly sworn, states that he is the plaintiff in this action, and that the itemization of accounts which follows is true and correct.

He further states that no part of the sum included in the itemization below has been paid or satisfied in any fashion, and is today due and owed to him.

ITEMIZATION OF ACCOUNTS

LOSS OF INCOME

\$7500

\$

\$

\$

\$

TOTAL

\$7,500.00

(Copies of bills, papers or other proof of any of the above accounts should be attached to this document.)

Sworn to and Subscribed before me  
this 10<sup>th</sup> day of January, 2025.

Magistrate or Notary Public for South Carolina

My Commission expires

10-13-2030

PLAINTIFF (or his attorney)

ERIC W. HUNT  
Notary Public, State of South Carolina  
My Commission Expires  
OCTOBER 13, 2030



HORRY COUNTY  
MYRTLE BEACH SUMMARY COURT

CASE INFORMATION SHEET

CIVIL LAWSUIT

DATE FILED: 1-10-25

PLAINTIFF (YOU)

NAME/ADDRESS:

John-Paul Miller  
4869 Highway 17 bypass  
MB SC 29577

HOME PHONE: \_\_\_\_\_

EMPLOYER: \_\_\_\_\_

FAX# \_\_\_\_\_

WORK PHONE: \_\_\_\_\_

ATTORNEY: \_\_\_\_\_

CELL PHONE: \_\_\_\_\_

DEFENDANT (THEM)

NAME/ADDRESS

Kenn Young  
[REDACTED]  
Myrtle Beach SC 29577

HOME PHONE: \_\_\_\_\_

EMPLOYER: \_\_\_\_\_

FAX # \_\_\_\_\_

WORK PHONE: \_\_\_\_\_

ATTORNEY: \_\_\_\_\_

CELL PHONE: \_\_\_\_\_

Amount of Suit: \$

7500<sup>00</sup>  
(Maximum \$7500)

\*\*\* RETURN THIS AND ALL ATTACHED FORMS TO THE CIVIL CLERK \*\*\*

Myrtle Beach Magistrate  
1201 21<sup>st</sup> Avenue North  
Myrtle Beach, SC 29577  
843-915-5293

STATE OF SOUTH CAROLINA

COUNTY OF HORRY

2025CV261090092  
CIVIL CASE NUMBER

IN THE MAGISTRATE'S COURT

SUMMONS

John Paul Miller  
4869 hwy 17 bypass  
Myrtle Beach, SC 29577

PLAINTIFF(S)

Vs

Courtney Anne  
[REDACTED]  
Myrtle Beach, SC 29588  
DEFENDANT(S)

TO THE DEFENDANT(S) NAMED ABOVE:

**YOU ARE SUMMONED** and required to answer the allegations of the attached complaint and present any appropriate counterclaims/crossclaims to the attached Complaint within **THIRTY** days from the first day after receipt of this summons. Your Answer must be received by the:

Myrtle Beach Magistrate Court  
1201 21st Avenue North  
Myrtle Beach, SC 29577  
Phone: (843) 915-5293  
Fax: (843) 444-6131

If you fail to answer within the prescribed time, a judgment by default may be rendered against you for the amount or other remedy requested in the attached complaint, plus interest and costs. **If you desire a jury trial, you must request one in writing at least five (5) working days prior to the date set for trial.** If no jury trial is timely requested, the matter will be heard and decided by the Judge.

Given under my hand:

\_\_\_\_\_  
JUDGE

**READ ATTACHED INSTRUCTIONS CAREFULLY**

January 10, 2025

2025 CV 861090092

CIVIL CASE NUMBER

STATE OF SOUTH CAROLINA )

COUNTY OF HORRY )

JOHN PAUL MILLER )

PLAINTIFF )

STREET ADDRESS )

CITY, STATE ZIP )

TELEPHONE )

VS. )

COURTNEY ANNE )

DEFENDANT(S) )

STREET ADDRESS )

Myrtle Beach, SC 29588 )

CITY, STATE ZIP )

TELEPHONE )

IN THE MAGISTRATE'S COURT

COMPLAINT

I, John Paul Miller, the plaintiff in this civil action do make the following claims:

1. I believe the defendant, Courtney Anne, is a resident of Horry County, and resides at [REDACTED], Myrtle Beach, SC 29588 which is within Judge Arakas's magisterial jurisdiction or this Complaint is properly filed in Horry County.

2. I make this complaint on the following:

**See Attached Facts and Causes of Action** (Attach supplement if necessary)

3. I believe, because of the above information, that I am entitled to and do request a judgment for **\$7,500.00** and/or other relief as below requested:

**Damages not to exceed Seven Thousand Five Hundred**

including any costs resulting in this action.

I state under penalty of perjury that the above is correct and truthful, except those based on my information and belief.

Dated: January 10, 2025

[Signature]  
Signature of Plaintiff (or his attorney)

## **SUPPLEMENT TO PLAINTIFF'S COMPLAINT**

### **FACTS COMMON TO ALL COUNTS**

1. Defendant has engaged in a persistent pattern of harassment against Plaintiff, including screaming and demonstrating against Plaintiff's mere existence in public locations throughout Horry County and posting statements on social media about Plaintiff, which are intended to paint Plaintiff in a false light and like a villain or criminal.

2. During these encounters, Defendant regularly screams and yells at Plaintiff in public, videos him with her phone, and posts videos or comments about Plaintiff on social media, all of which cause Plaintiff severe emotional distress and public humiliation.

3. Defendant, with others, has followed Plaintiff while he is driving around Myrtle Beach in a manner that places Plaintiff in fear for his safety.

4. Defendant claims to be protesting on behalf of domestic violence victims and infers that Plaintiff is a domestic abuser.

5. Defendant does not actually help victims of any violence and protests nothing other than Plaintiff's existence. In fact, Defendant only harasses and stalks the Plaintiff.

6. Defendant posts statements and videos about Plaintiff where she describes him as an abuser, corrupt, and a criminal, and Plaintiff's late wife as a victim of his abuse.

7. Defendant's conduct is intended to harm Plaintiff and enrich Defendant through publicity and fame in a group of like-minded stalkers and through the monetization of social media accounts, channels, and platforms.

8. Much of Defendant's conduct is carried out under the guise that she is seeking justice for Plaintiff's late wife or protesting domestic violence, a crime that Plaintiff was never charged with committing and for which there is no factual basis.

9. The interest that a subset of people have in Plaintiff, and in the life of his late wife, was created entirely by Defendant and others like her who have determined on their own that Plaintiff is guilty of a crime that law enforcement officials have cleared him of or never charged him with committing.

10. Defendant has published false and defamatory statements about Plaintiff on various social media platforms, including Facebook, with the intent to damage Plaintiff's reputation and interfere with his livelihood and his ministry.

11. Defendant's actions have been calculated to intimidate Plaintiff from appearing in public and conducting his normal activities, including the operation of his church.

12. Defendant's actions have been calculated to intimidate or influence others from congregating at Plaintiff's church or with Plaintiff in any setting.

13. Defendant's harassment and intimidation of Plaintiff and those associated with him have interfered with Plaintiff's ability to live his life without interference from Defendant or others who are influenced by Defendant's actions.

14. As a direct result of Defendant's actions, friends and acquaintances of Plaintiff have expressed reluctance to be seen with Plaintiff or to do business with Plaintiff or his affiliated companies.

15. Defendant's harassment and intimidation of Plaintiff and those associated with him have interfered with Plaintiff's ability to earn a living, conduct church services, minister to his congregation, and maintain relationships with church members and the broader religious community.

16. As a direct result of the Defendant's actions, multiple church members have expressed reluctance to attend services and baptisms, and attendance and participation have declined.

17. Defendant's actions have created a dangerous environment for Plaintiff, placing him in fear for his safety and the safety of others.

18. Nothing being posted or stated about Plaintiff by Defendant is newsworthy or in the public interest.

**AS AND FOR A FIRST CAUSE OF ACTION**  
(Invasion of Privacy)

19. Plaintiff incorporates by reference all preceding paragraphs as if fully set forth herein.

20. Defendant engaged in a pattern of intentional, substantial, and unreasonable intrusion upon Plaintiff's life.

21. Defendant's actions served no legitimate purpose and would have caused a reasonable person to suffer substantial emotional distress.

22. Defendant intentionally intruded upon Plaintiff's private affairs and concerns.

23. The intrusion would be highly offensive to a reasonable person.

24. Defendant engaged in a pattern of words and conduct that served no legitimate purpose and caused Plaintiff to reasonably fear for his safety or suffer substantial emotional distress.

25. Defendant's conduct constitutes the unwarranted appropriation or exploitation of Plaintiff's personality and private affairs, with which the public has no legitimate concern, or the wrongful intrusion into Plaintiff's private activities in such a manner as to outrage or cause mental suffering, shame, or humiliation to a person of ordinary sensibilities.

26. Defendant invaded Plaintiff's right to privacy in one or more of the following ways: wrongfully appropriating Plaintiff's personality; publicizing Plaintiff's private affairs, which have no legitimate public concern; or wrongfully intruding into Plaintiff's private affairs.

27. Defendant's actions also violated South Carolina criminal statutes prohibiting harassment and stalking.

28. Law enforcement officers have refused to enforce criminal statutes enacted to protect people like the Plaintiff, leaving Plaintiff no choice but to bring this action.

29. As a direct and proximate result of Defendant's actions, Plaintiff has suffered damages, including emotional distress, reputational harm, anxiety, and other injuries, in an amount to be proven, but not more than \$7,500.00.



2015 CV 86108 0092

CIVIL CASE NUMBER

STATE OF SOUTH CAROLINA )

COUNTY OF HORRY )

JOHN PAUL MILLER )

PLAINTIFF(S) )

VS. )

COURTNEY ANNE )

DEFENDANT(S). )

IN THE MAGISTRATE'S COURT

AFFIDAVIT AND ITEMIZATION  
OF ACCOUNTS

Plaintiff, JOHN PAUL MILLER, personally appearing before me, who, being duly sworn, states that he is the plaintiff in this action, and that the itemization of accounts which follows is true and correct.

He further states that no part of the sum included in the itemization below has been paid or satisfied in any fashion, and is today due and owed to him.

ITEMIZATION OF ACCOUNTS

LOSS OF INCOME

\$7500

\$  
\$  
\$  
\$

TOTAL

\$7,500.00

(Copies of bills, papers or other proof of any of the above accounts should be attached to this document.)

Sworn to and Subscribed before me  
this 10<sup>th</sup> day of January, 2025.



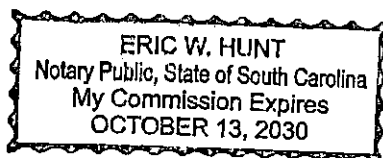
Magistrate or Notary Public for South Carolina

My Commission expires

10-13-2030



PLAINTIFF (or his attorney)





HORRY COUNTY  
MYRTLE BEACH SUMMARY COURT

CASE INFORMATION SHEET

CIVIL LAWSUIT

DATE FILED: 1-10-25

PLAINTIFF (YOU)

NAME/ADDRESS: John-Paul Miller HOME PHONE: \_\_\_\_\_  
4869 Highway 17 bypass EMPLOYER: \_\_\_\_\_  
MB SC 29577 FAX# \_\_\_\_\_  
WORK PHONE: \_\_\_\_\_  
ATTORNEY: \_\_\_\_\_ CELL PHONE: \_\_\_\_\_

DEFENDANT (THEM)

NAME/ADDRESS Courtney Anne HOME PHONE: \_\_\_\_\_  
[REDACTED] EMPLOYER: \_\_\_\_\_  
MB SC 29588 FAX # \_\_\_\_\_  
WORK PHONE: \_\_\_\_\_  
ATTORNEY: \_\_\_\_\_ CELL PHONE: \_\_\_\_\_

Amount of Suit: \$ 7500<sup>00</sup>  
(Maximum \$7500)

\*\*\* RETURN THIS AND ALL ATTACHED FORMS TO THE CIVIL CLERK \*\*\*

Myrtle Beach Magistrate  
1201 21<sup>st</sup> Avenue North  
Myrtle Beach, SC 29577  
843-915-5293

**AFFIDAVIT OF SERVICE**

**State of South Carolina**

**County of Horry**

**Magistrate Court**

Case Number: 2025-CV-26-1090094

Plaintiff:  
**John Paul Miller**

vs.

Defendant:  
**Sandra Kay Caron**

For:  
John Paul Miller  
4869 Hwy 17 Bypass  
Myrtle Beach, SC 29577

MYRTLE BEACH  
MAGISTRATE'S OFFICE  
26 JAN 27 AM 11:17  
DISTRICT #6

Received by VPS Solutions, LLC to be served on **Sandra Kay Caron**, [REDACTED] **Myrtle Beach, SC 29577**.

I, Anthony Marlowe, being duly sworn, depose and say that on the **16th day of January, 2025 at 8:15 am, I:**

**INDIVIDUALLY/PERSONALLY** served by delivering a true copy of the **Summons and Complaint, Affidavit and Itemization of Accounts, Instructions for Defendant, Form Answer** with the date and hour of service endorsed thereon by me, to: **Sandra Kay Caron** at the address of: [REDACTED] **Myrtle Beach, SC 29577**, and informed said person of the contents therein, in compliance with state statutes.


**Military Status:** Based upon inquiry of party served, Defendant is not in the military service of the United States of America.

**Marital Status:** Based upon inquiry of party served, Defendant is married.

I certify that I am over the age of 18, have no interest in the above action, and am in good standing, in the judicial circuit in which the process was served.

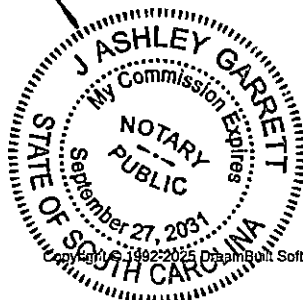
Subscribed and Sworn to before me on the 16th day of January, 2025 by the affiant who is personally known to me.

NOTARY PUBLIC

  
Anthony Marlowe  
Process Server

VPS Solutions, LLC  
1318 N Main St #1445  
Summerville, SC 29483  
(843) 817-3886

Our Job Serial Number: VPL-2025000083



STATE OF SOUTH CAROLINA

COUNTY OF HORRY

2025CV261090094  
CIVIL CASE NUMBER

IN THE MAGISTRATE'S COURT

SUMMONS

John Paul Miller  
4869 hwy 17 bypass  
Myrtle Beach, SC 29577

PLAINTIFF(S)

Vs

Sandra Kay Caron  
[REDACTED]  
Myrtle Beach, SC 29577  
DEFENDANT(S)

TO THE DEFENDANT(S) NAMED ABOVE:

**YOU ARE SUMMONED** and required to answer the allegations of the attached complaint and present any appropriate counterclaims/crossclaims to the attached Complaint within **THIRTY** days from the first day after receipt of this summons. Your Answer must be received by the:

Myrtle Beach Magistrate Court  
1201 21st Avenue North  
Myrtle Beach, SC 29577  
Phone: (843) 915-5293  
Fax: (843) 444-6131

If you fail to answer within the prescribed time, a judgment by default may be rendered against you for the amount or other remedy requested in the attached complaint, plus interest and costs. **If you desire a jury trial, you must request one in writing at least five (5) working days prior to the date set for trial.** If no jury trial is timely requested, the matter will be heard and decided by the Judge.

Given under my hand:

\_\_\_\_\_  
JUDGE

**READ ATTACHED INSTRUCTIONS CAREFULLY**

January 10, 2025

2025CV16109 0094  
CIVIL CASE NUMBER

STATE OF SOUTH CAROLINA )

COUNTY OF HORRY )

JOHN PAUL MILLER )

PLAINTIFF )

STREET ADDRESS )

CITY, STATE ZIP )

TELEPHONE )

VS. )

SANDRA CARON )

DEFENDANT(S) )

STREET ADDRESS )

Myrtle Beach, SC 29577 )

CITY, STATE ZIP )

TELEPHONE )

IN THE MAGISTRATE'S COURT

COMPLAINT

I, John Paul Miller, the plaintiff in this civil action do make the following claims:

1. I believe the defendant, Sandra Caron, is a resident of Horry County, and resides at [REDACTED] Myrtle Beach, SC 29577 which is within Judge Arakas's magisterial jurisdiction or this Complaint is properly filed in Horry County.

2. I make this complaint on the following:

**See Attached Facts and Causes of Action** (Attach supplement if necessary)

3. I believe, because of the above information, that I am entitled to and do request a judgment for \$7,500.00 and/or other relief as below requested:

**Damages not to exceed Seven Thousand Five Hundred**

including any costs resulting in this action.

I state under penalty of perjury that the above is correct and truthful, except those based on my information and belief.

Dated: January 10, 2025

[Signature]  
Signature of Plaintiff (or his attorney)

## **SUPPLEMENT TO PLAINTIFF'S COMPLAINT**

### **FACTS COMMON TO ALL COUNTS**

1. Defendant has engaged in a persistent pattern of harassment against Plaintiff, including screaming and demonstrating against Plaintiff's mere existence in public locations throughout Horry County and posting statements on social media about Plaintiff, which are intended to paint Plaintiff in a false light and like a villain or criminal.

2. During these encounters, Defendant regularly screams and yells at Plaintiff in public, videos him with her phone, and posts videos or comments about Plaintiff on social media, all of which cause Plaintiff severe emotional distress and public humiliation.

3. Defendant claims to be protesting on behalf of domestic violence victims and infers that Plaintiff is a domestic abuser.

4. Defendant does not actually help victims of any violence and protests nothing other than Plaintiff's existence. In fact, Defendant only harasses and stalks the Plaintiff and others.

5. Defendant posts invitations and announcements for "rallies" that equate Plaintiff to an abuser, a narcissist, corrupt, and a criminal, and Plaintiff's late wife to a victim of his abuse.

6. Defendant's conduct is intended to harm Plaintiff and enrich Defendant through publicity and fame in a group of like-minded stalkers and through the monetization of social media accounts, channels, and platforms.

7. Much of Defendant's conduct is carried out under the guise that she is protesting domestic violence, a crime that Plaintiff was never charged with committing and for which there is no factual basis.

8. The interest that a subset of people has in Plaintiff, and in the life of his late wife, was created entirely by Defendant and others like her who have determined on their own that

Plaintiff is guilty of a crime that law enforcement officials have cleared him of or never charged him with committing.

9. Defendant has published false and defamatory statements about Plaintiff on various social media platforms, including Facebook, to damage Plaintiff's reputation and interfere with his livelihood and ministry.

10. Defendant's actions have been calculated to intimidate Plaintiff from appearing in public and conducting his normal activities, including the operation of his church.

11. Defendant's actions have been calculated to intimidate or influence others from congregating at Plaintiff's church or with Plaintiff in any setting.

12. Defendant's harassment and intimidation of Plaintiff and those associated with him have interfered with Plaintiff's ability to live his life without interference from Defendant or others who are influenced by Defendant's actions.

13. As a direct result of Defendant's actions, friends and acquaintances of Plaintiff have expressed reluctance to be seen with Plaintiff or to do business with Plaintiff or his affiliated companies.

14. Defendant's harassment and intimidation of Plaintiff and those associated with him have interfered with Plaintiff's ability to earn a living, conduct church services, minister to his congregation, and maintain relationships with church members and the broader religious community.

15. As a direct result of the Defendant's actions, multiple church members have expressed reluctance to attend services and baptisms, and attendance and participation have declined.

16. Defendant's actions have created a dangerous environment for Plaintiff, placing him in fear for his safety and the safety of others.

17. Nothing being posted or stated about Plaintiff by Defendant is newsworthy or in the public interest.

**AS AND FOR A FIRST CAUSE OF ACTION**  
(Invasion of Privacy)

18. Plaintiff incorporates by reference all preceding paragraphs as if fully set forth herein.

19. Defendant engaged in a pattern of intentional, substantial, and unreasonable intrusion upon Plaintiff's life.

20. Defendant's actions served no legitimate purpose and would have caused a reasonable person to suffer substantial emotional distress.

21. Defendant intentionally intruded upon Plaintiff's private affairs and concerns.

22. The intrusion would be highly offensive to a reasonable person.

23. Defendant engaged in a pattern of words and conduct that served no legitimate purpose and caused Plaintiff to reasonably fear for his safety or suffer substantial emotional distress.

24. Defendant's conduct constitutes the unwarranted appropriation or exploitation of Plaintiff's personality and private affairs, with which the public has no legitimate concern, or the wrongful intrusion into Plaintiff's private activities in such a manner as to outrage or cause mental suffering, shame, or humiliation to a person of ordinary sensibilities.

25. Defendant invaded Plaintiff's right to privacy in one or more of the following ways: wrongfully appropriating Plaintiff's personality; publicizing Plaintiff's private affairs, which have no legitimate public concern; or wrongfully intruding into Plaintiff's private affairs.

26. Defendant's actions also violated South Carolina criminal statutes prohibiting harassment and stalking.

27. Law enforcement officers have refused to enforce criminal statutes enacted to protect people like the Plaintiff, leaving Plaintiff no choice but to bring this action.

28. As a direct and proximate result of Defendant's actions, Plaintiff has suffered damages, including emotional distress, reputational harm, anxiety, and other injuries, in an amount to be proven, but not more than \$7,500.00.





2025CV061090094

CIVIL CASE NUMBER

STATE OF SOUTH CAROLINA )

COUNTY OF HORRY )

JOHN PAUL MILLER )

PLAINTIFF(S) )

VS. )

SANDRA CARON )

DEFENDANT(S). )

IN THE MAGISTRATE'S COURT

AFFIDAVIT AND ITEMIZATION  
OF ACCOUNTS

Plaintiff, JOHN PAUL MILLER, personally appearing before me, who, being duly sworn, states that he is the plaintiff in this action, and that the itemization of accounts which follows is true and correct.

He further states that no part of the sum included in the itemization below has been paid or satisfied in any fashion, and is today due and owed to him.

ITEMIZATION OF ACCOUNTS

LOSS OF INCOME

\$7500

\$  
\$  
\$  
\$

TOTAL

\$7,500.00

(Copies of bills, papers or other proof of any of the above accounts should be attached to this document.)

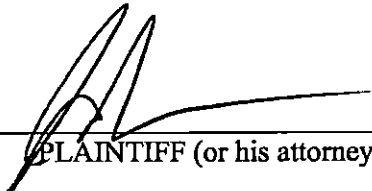
Sworn to and Subscribed before me )

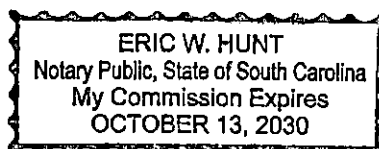
this 10th day of January, 2025. )

  
Magistrate or Notary Public for South Carolina )

My Commission expires )

10-13-2030 )

  
PLAINTIFF (or his attorney)



HORRY COUNTY  
MYRTLE BEACH SUMMARY COURT

CASE INFORMATION SHEET

CIVIL LAWSUIT

DATE FILED: 1-10-25

PLAINTIFF (YOU)

NAME/ADDRESS:

John-Paul Miller  
4869 Highway 17 bypass  
MB SC 29577

HOME PHONE: \_\_\_\_\_

EMPLOYER: \_\_\_\_\_

FAX# \_\_\_\_\_

WORK PHONE: \_\_\_\_\_

ATTORNEY: \_\_\_\_\_

CELL PHONE: \_\_\_\_\_

DEFENDANT (THEM)

NAME/ADDRESS

Sandra Carr

HOME PHONE: \_\_\_\_\_

EMPLOYER: \_\_\_\_\_

FAX # \_\_\_\_\_

WORK PHONE: \_\_\_\_\_

ATTORNEY: \_\_\_\_\_

CELL PHONE: \_\_\_\_\_

Amount of Suit: \$

7500<sup>00</sup>

(Maximum \$7500)

\*\*\* RETURN THIS AND ALL ATTACHED FORMS TO THE CIVIL CLERK\*\*\*

Myrtle Beach Magistrate  
1201 21<sup>st</sup> Avenue North  
Myrtle Beach, SC 29577  
843-915-5293

## AFFIDAVIT OF SERVICE

State of South Carolina

County of Horry

Magistrate Court

Case Number: 2025-CV-26-1090095

Plaintiff:

John Paul Miller

vs.

Defendant:

Tracy Ann Hermes

For:

John Paul Miller

4869 Hwy 17 Bypass

Myrtle Beach, SC 29577

MYRTLE BEACH  
MAGISTRATE'S OFFICE  
2025 JAN 27 AM 11:4  
DISTRICT #6

Received by VPS Solutions, LLC to be served on Tracy Ann Hermes, [REDACTED] Myrtle Beach, SC 29579.

I, Anthony Marlowe, being duly sworn, depose and say that on the 16th day of January, 2025 at 8:30 am, I:

**SUBSTITUTE** served by delivering a true copy of the **Summons and Complaint, Affidavit and Itemization of Accounts, Instructions for Defendant, Form Answer** with the date and hour of service endorsed thereon by me, to: **Tobin Gregory as Co Resident** at the address of: [REDACTED] **Myrtle Beach, SC 29579**, the within named person's usual place of **Abode**, who resides therein, who is fifteen (15) years of age or older and informed said person of the contents therein, in compliance with state statutes.

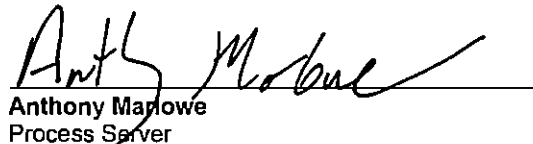
**Military Status:** The person served with said documents refused to state whether or not the Defendant is in the Military Service of the United States of America.

**Marital Status:** Based upon inquiry of party served, they refused to state whether or not the Defendant is married.

I certify that I am over the age of 18, have no interest in the above action, and am in good standing, in the judicial circuit in which the process was served.

Subscribed and Sworn to before me on the 16th day of January, 2025 by the affiant who is personally known to me.

NOTARY PUBLIC

  
Anthony Marlowe  
Process Server

VPS Solutions, LLC  
1318 N Main St #1445  
Summerville, SC 29483  
(843) 817-3886

Our Job Serial Number: VPL-2025000089



STATE OF SOUTH CAROLINA

COUNTY OF HORRY

**2025CV261090095**  
CIVIL CASE NUMBER

IN THE MAGISTRATE'S COURT

SUMMONS

John Paul Miller  
4869 hwy 17 bypass  
Myrtle Beach, SC 29577

---

PLAINTIFF(S)

Vs

Tracy Ann Hermes

Myrtle Beach, SC 29579-7030

---

DEFENDANT(S)

**TO THE DEFENDANT(S) NAMED ABOVE:**

**YOU ARE SUMMONED** and required to answer the allegations of the attached complaint and present any appropriate counterclaims/crossclaims to the attached Complaint within THIRTY days from the first day after receipt of this summons. Your Answer must be received by the:

**Myrtle Beach Magistrate Court**  
1201 21st Avenue North  
Myrtle Beach, SC 29577  
Phone: (843) 915-5293  
Fax: (843) 444-6131

If you fail to answer within the prescribed time, a judgment by default may be rendered against you for the amount or other remedy requested in the attached complaint, plus interest and costs. **If you desire a jury trial, you must request one in writing at least five (5) working days prior to the date set for trial.** If no jury trial is timely requested, the matter will be heard and decided by the Judge.

Given under my hand:

\_\_\_\_\_  
JUDGE

**READ ATTACHED INSTRUCTIONS CAREFULLY**

January 10, 2025

20250106/090095  
CIVIL CASE NUMBER

STATE OF SOUTH CAROLINA )  
COUNTY OF HORRY )  
JOHN PAUL MILLER )  
PLAINTIFF )  
STREET ADDRESS )  
CITY, STATE ZIP )  
TELEPHONE )  
VS. )  
TRACY HERMES )  
DEFENDANT(S) )  
STREET ADDRESS )  
Myrtle Beach, SC 29579, )  
CITY, STATE ZIP )  
TELEPHONE )

IN THE MAGISTRATE'S COURT

COMPLAINT

I, John Paul Miller, the plaintiff in this civil action do make the following claims:

1. I believe the defendant, TRACY HERMES, is a resident of Horry County, and resides at [REDACTED] Myrtle Beach, SC 29579 which is within Judge Arakas's magisterial jurisdiction or this Complaint is properly filed in Horry County.

2. I make this complaint on the following:

**See Attached Facts and Causes of Action** (Attach supplement if necessary)

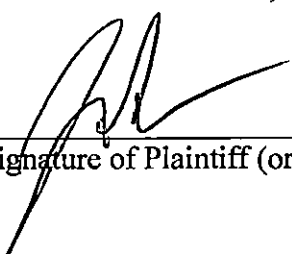
3. I believe, because of the above information, that I am entitled to and do request a judgment for **\$7,500.00** and/or other relief as below requested:

**Damages not to exceed Seven Thousand Five Hundred**

including any costs resulting in this action.

I state under penalty of perjury that the above is correct and truthful, except those based on my information and belief.

Dated: January 10, 2025

  
\_\_\_\_\_  
Signature of Plaintiff (or his attorney)

## **SUPPLEMENT TO PLAINTIFF'S COMPLAINT**

### **FACTS COMMON TO ALL COUNTS**

1. Defendant has posted false and defamatory videos or comments about Plaintiff on social media causing Plaintiff severe emotional distress and public humiliation.
2. Defendant does not know Plaintiff but has decided that Plaintiff murdered his late wife.
3. Defendant posted a comment on Facebook wherein she stated that "JP Miller killed Mica," who is the Plaintiff's late wife.
4. Defendant's conduct and post were intended to harm Plaintiff.
5. Defendant's dissemination of false information has interfered with Plaintiff's ability to live his life without interference from Defendant or others who are influenced by Defendant's words.
6. Defendant's actions have created a dangerous environment for Plaintiff, placing him in fear for his safety and the safety of others.
7. Nothing being posted or stated about Plaintiff by Defendant is newsworthy or in the public interest.

### **AS AND FOR A FIRST CAUSE OF ACTION (Defamation)**

8. Plaintiff incorporates by reference all preceding paragraphs as if fully set forth herein.
9. Defendant made false and defamatory statements concerning Plaintiff, specifically: Defendant posted a comment that Plaintiff killed his late wife.
10. Defendant published these statements to third parties by posting the comment on Facebook.

11. The statement was false when made, and Defendant knew or should have known they were false, or were made with reckless disregard for the truth.

12. The statements were defamatory per se in that they imputed to Plaintiff the commission of a crime.

13. Plaintiff is entitled to damages against Defendant in an amount not to exceed \$7,500 for this case.



2015 CV 161080095

CIVIL CASE NUMBER

STATE OF SOUTH CAROLINA )  
COUNTY OF HORRY )  
JOHN PAUL MILLER )  
PLAINTIFF(S) )  
VS. )  
TRACY HERMES )  
DEFENDANT(S). )

IN THE MAGISTRATE'S COURT

AFFIDAVIT AND ITEMIZATION  
OF ACCOUNTS

Plaintiff, JOHN PAUL MILLER, personally appearing before me, who, being duly sworn, states that he is the plaintiff in this action, and that the itemization of accounts which follows is true and correct.

He further states that no part of the sum included in the itemization below has been paid or satisfied in any fashion, and is today due and owed to him.

ITEMIZATION OF ACCOUNTS

LOSS OF INCOME	\$7500
	\$
	\$
	\$
	\$
TOTAL	<u>\$7,500.00</u>

(Copies of bills, papers or other proof of any of the above accounts should be attached to this document.)

Sworn to and Subscribed before me  
this 10th day of January, 2025.

Magistrate or Notary Public for South Carolina

My Commission expires 10-13-2030

ERIC W. HUNT  
Notary Public, State of South Carolina  
My Commission Expires  
OCTOBER 13, 2030

PLAINTIFF (or his attorney)





HORRY COUNTY  
MYRTLE BEACH SUMMARY COURT

CASE INFORMATION SHEET

CIVIL LAWSUIT

DATE FILED: 1-10-25

PLAINTIFF (YOU)

NAME/ADDRESS: John-Paul Miller HOME PHONE: \_\_\_\_\_  
4869 Highway 17 bypass EMPLOYER: \_\_\_\_\_  
MB SC 29577 FAX# \_\_\_\_\_  
WORK PHONE: \_\_\_\_\_  
ATTORNEY: \_\_\_\_\_ CELL PHONE: \_\_\_\_\_

DEFENDANT (THEM)

NAME/ADDRESS Tracy Hermes HOME PHONE: \_\_\_\_\_  
[REDACTED] EMPLOYER: \_\_\_\_\_  
MB SC 29579 FAX # \_\_\_\_\_  
WORK PHONE: \_\_\_\_\_  
ATTORNEY: \_\_\_\_\_ CELL PHONE: \_\_\_\_\_

Amount of Suit: \$ 7500<sup>00</sup>  
(Maximum \$7500)

\*\*\* RETURN THIS AND ALL ATTACHED FORMS TO THE CIVIL CLERK \*\*\*

Myrtle Beach Magistrate  
1201 21<sup>st</sup> Avenue North  
Myrtle Beach, SC 29577  
843-915-5293

## AFFIDAVIT OF SERVICE

State of South Carolina

County of Horry

Magistrate Court

Case Number: 2025-CV-26-1090096

Plaintiff:  
**John Paul Miller**

vs.

Defendant:  
**Alexandra Golden Cuozzo**

For:  
John Paul Miller  
4869 Hwy 17 Bypass  
Myrtle Beach, SC 29577

MYRTLE BEACH  
MAGISTRATE'S OFFICE  
2025 JAN 27 AM 11:47  
DISTRICT #6

Received by VPS Solutions, LLC to be served on **Alexandra Cuozzo**, [REDACTED]  
Myrtle Beach, SC 29579.

I, Anthony Marlowe, being duly sworn, depose and say that on the 19th day of January, 2025 at 1:00 pm, I:

**INDIVIDUALLY/PERSONALLY** served by delivering a true copy of the **Summons and Complaint, Affidavit and Itemization of Accounts, Instructions for Defendant, Form Answer** with the date and hour of service endorsed thereon by me, to: **Alexandra Cuozzo** at the address of: [REDACTED]  
[REDACTED] Myrtle Beach, SC 29579, and informed said person of the contents therein, in compliance with state statutes.

**Military Status:** Based upon inquiry of party served, Defendant is not in the military service of the United States of America.

**Marital Status:** Based upon inquiry of party served, Defendant is not married.

I certify that I am over the age of 18, have no interest in the above action, and am in good standing, in the judicial circuit in which the process was served.

Subscribed and Sworn to before me on the 20th day of January, 2025 by the affiant who is personally known to me.

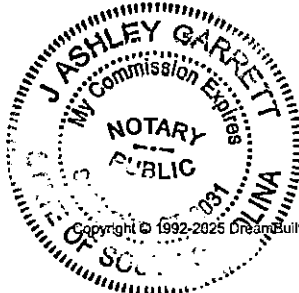
NOTARY PUBLIC

*Anthony Marlowe*

Anthony Marlowe  
Process Server

VPS Solutions, LLC  
1318 N Main St #1445  
Summerville, SC 29483  
(843) 817-3886

Our Job Serial Number: VPL-2025000115



STATE OF SOUTH CAROLINA

COUNTY OF HORRY

2025CV261090096  
CIVIL CASE NUMBER

IN THE MAGISTRATE'S COURT

SUMMONS

John Paul Miller  
4869 hwy 17 bypass  
Myrtle Beach, SC 29577

PLAINTIFF(S)

Vs

Alexandra Golden Cuozzo  
[REDACTED]  
Myrtle Beach, SC 29577-1897  
DEFENDANT(S)

TO THE DEFENDANT(S) NAMED ABOVE:

**YOU ARE SUMMONED** and required to answer the allegations of the attached complaint and present any appropriate counterclaims/crossclaims to the attached Complaint within THIRTY days from the first day after receipt of this summons. Your Answer must be received by the:

Myrtle Beach Magistrate Court  
1201 21st Avenue North  
Myrtle Beach, SC 29577  
Phone: (843) 915-5293  
Fax: (843) 444-6131

If you fail to answer within the prescribed time, a judgment by default may be rendered against you for the amount or other remedy requested in the attached complaint, plus interest and costs. **If you desire a jury trial, you must request one in writing at least five (5) working days prior to the date set for trial.** If no jury trial is timely requested, the matter will be heard and decided by the Judge.

Given under my hand:

\_\_\_\_\_  
JUDGE

**READ ATTACHED INSTRUCTIONS CAREFULLY**

January 10, 2025

2025 CV # 1050096

CIVIL CASE NUMBER

STATE OF SOUTH CAROLINA )

COUNTY OF HORRY )

JOHN PAUL MILLER )

PLAINTIFF )

STREET ADDRESS )

CITY, STATE ZIP )

TELEPHONE )

VS. )

ALEXANDRA CUOZZO )

DEFENDANT(S) )

STREET ADDRESS )

MYRTLE BEACH, SC 29577 )

CITY, STATE ZIP )

TELEPHONE )

IN THE MAGISTRATE'S COURT

COMPLAINT

I, John Paul Miller, the plaintiff in this civil action do make the following claims:

1. I believe the defendant, ALLEY CUOZZO, is a resident of Horry County, and resides at [REDACTED], Myrtle Beach, SC 29577 which is within Judge Arakas's magisterial jurisdiction or this Complaint is properly filed in Horry County.

2. I make this complaint on the following:

**See Attached Facts and Causes of Action** (Attach supplement if necessary)

3. I believe, because of the above information, that I am entitled to and do request a judgment for \$7,500.00 and/or other relief as below requested:

**Damages not to exceed Seven Thousand Five Hundred**

including any costs resulting in this action.

I state under penalty of perjury that the above is correct and truthful, except those based on my information and belief.

Dated: January 10, 2025

[Signature]  
Signature of Plaintiff (or his attorney)

## **SUPPLEMENT TO PLAINTIFF'S COMPLAINT**

### **FACTS COMMON TO ALL COUNTS**

1. Defendant has engaged in a persistent pattern of harassment against Plaintiff, including screaming and demonstrating against Plaintiff's mere existence in public locations throughout Horry County.

2. During these encounters, Defendant regularly screams and yells at Plaintiff in public, videos him with her phone, and posts videos or comments about Plaintiff on social media, all of which cause Plaintiff severe emotional distress and public humiliation.

3. Defendant claims to be a member of a group she refers to as "Justice for Mica" which helps organize mobs of people to scream and shout at Plaintiff for having the temerity to live, function, and attempt to work in Horry County.

4. Though Defendant and those like her refer to the rallies as "protests", they are anything but legitimate and do not protest anything other than Plaintiff's existence. In fact, the "rallies" are nothing more than poorly organized mobs harassing and stalking the Plaintiff and others.

5. Defendant gives interviews about her involvement in the rallies and promotes her belief that a private citizen murdered and abused his wife.

6. Defendant helped to create and perpetuate a fictional tale about Plaintiff and his late wife in an effort to create a cause that Defendant can "serve" through false concern and outrage.

7. Defendant uses Plaintiff's name and image to promote her groups and social media accounts.

8. Defendant's conduct is intended to enrage the public, harm Plaintiff, and enrich Defendant through monetizing social media accounts, channels, and platforms, and drawing attention to herself and those who are members of her "groups."

9. Much of Defendant's conduct is carried out under the guise that she is protesting domestic violence, a crime that Plaintiff was never charged with committing and for which there is no factual basis.

10. The interest that a subset of people has in Plaintiff, and in the life of his late wife, was created entirely by Defendant and others like her who have determined on their own that Plaintiff is guilty of a crime that law enforcement officials have cleared him of or never charged him with committing.

11. Defendant has published false and defamatory statements about Plaintiff on various social media platforms, including Facebook and Tiktok, with the intent to damage Plaintiff's reputation and interfere with his ministry.

12. Defendant's actions have been calculated to intimidate Plaintiff from appearing in public and conducting his normal activities, including the operation of his church.

13. Defendant's actions have been calculated to intimidate or influence others from congregating at Plaintiff's church or with Plaintiff in any setting.

14. Defendant's harassment and intimidation of Plaintiff and those associated with him have interfered with Plaintiff's ability to live his life without interference from Defendant or others who are influenced by Defendant's actions.

15. As a direct result of Defendant's actions, friends and acquaintances of Plaintiff have expressed reluctance to be seen with Plaintiff or to do business with Plaintiff or his affiliated companies.

16. Defendant's harassment and intimidation of Plaintiff and those associated with him have interfered with Plaintiff's ability to earn a living, conduct church services, minister to his congregation, and maintain relationships with church members and the broader religious community.

17. As a direct result of the Defendant's actions, multiple church members have expressed reluctance to attend services and baptisms, and attendance and participation have declined.

18. Defendant's actions have created a dangerous environment for Plaintiff, placing him in fear for his safety and the safety of others.

19. Nothing being posted or stated about Plaintiff by Defendant is newsworthy or in the public interest.

**AS AND FOR A FIRST CAUSE OF ACTION**  
(Invasion of Privacy)

20. Plaintiff incorporates by reference all preceding paragraphs as if fully set forth herein.

21. Defendant engaged in a pattern of intentional, substantial, and unreasonable intrusion upon Plaintiff's life.

22. Defendant's actions served no legitimate purpose and would have caused a reasonable person to suffer substantial emotional distress.

23. Defendant intentionally intruded upon Plaintiff's private affairs and concerns.

24. The intrusion would be highly offensive to a reasonable person.

25. Defendant engaged in a pattern of words and conduct that served no legitimate purpose and caused Plaintiff to reasonably fear for his safety or suffer substantial emotional distress.

26. Defendant's conduct constitutes the unwarranted appropriation or exploitation of Plaintiff's personality and private affairs, with which the public has no legitimate concern, or the wrongful intrusion into Plaintiff's private activities in such a manner as to outrage or cause mental suffering, shame, or humiliation to a person of ordinary sensibilities.

27. Defendant invaded Plaintiff's right to privacy in one or more of the following ways: wrongfully appropriating Plaintiff's personality; publicizing the Plaintiff's private affairs, which have no legitimate public concern; or wrongfully intruding into Plaintiff's private affairs.

28. Defendant's actions also violated South Carolina criminal statutes prohibiting harassment and stalking.

29. Law enforcement officers have refused to enforce criminal statutes enacted to protect people like the Plaintiff, leaving Plaintiff no choice but to bring this action.

30. As a direct and proximate result of Defendant's actions, Plaintiff has suffered damages, including emotional distress, reputational harm, anxiety, and other injuries, in an amount to be proven, but not more than \$7,500.00.



102504861090096

CIVIL CASE NUMBER

STATE OF SOUTH CAROLINA )

COUNTY OF HORRY )

JOHN PAUL MILLER )

PLAINTIFF(S) )

VS. )

ALEXANDRA CUOZZO )

DEFENDANT(S). )

IN THE MAGISTRATE'S COURT

AFFIDAVIT AND ITEMIZATION  
OF ACCOUNTS

Plaintiff, JOHN PAUL MILLER, personally appearing before me, who, being duly sworn, states that he is the plaintiff in this action, and that the itemization of accounts which follows is true and correct.

He further states that no part of the sum included in the itemization below has been paid or satisfied in any fashion, and is today due and owed to him.

ITEMIZATION OF ACCOUNTS

LOSS OF INCOME	\$7500
	\$
	\$
	\$
	\$
TOTAL	\$7,500.00

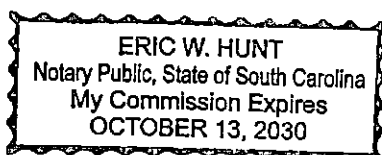
(Copies of bills, papers or other proof of any of the above accounts should be attached to this document.)

Sworn to and Subscribed before me  
this 10th day of January, 2025.

Magistrate or Notary Public for South Carolina

My Commission expires 10-13-2025

PLAINTIFF (or his attorney)



HORRY COUNTY  
MYRTLE BEACH SUMMARY COURT

CASE INFORMATION SHEET

CIVIL LAWSUIT

DATE FILED: 1-10-25

PLAINTIFF (YOU)

NAME/ADDRESS: John-Paul Miller HOME PHONE: \_\_\_\_\_  
4869 Highway 17 bypass EMPLOYER: \_\_\_\_\_  
MB SC 29577 FAX# \_\_\_\_\_  
WORK PHONE: \_\_\_\_\_  
ATTORNEY: \_\_\_\_\_ CELL PHONE: \_\_\_\_\_

DEFENDANT (THEM)

NAME/ADDRESS Alfreda Cruz HOME PHONE: \_\_\_\_\_  
MB SC 29577 EMPLOYER: \_\_\_\_\_  
FAX # \_\_\_\_\_  
WORK PHONE: \_\_\_\_\_  
ATTORNEY: \_\_\_\_\_ CELL PHONE: \_\_\_\_\_

Amount of Suit: \$ 7500<sup>00</sup>  
(Maximum \$7500)

\*\*\* RETURN THIS AND ALL ATTACHED FORMS TO THE CIVIL CLERK \*\*\*

Myrtle Beach Magistrate  
1201 21<sup>st</sup> Avenue North  
Myrtle Beach, SC 29577  
843-915-5293

STATE OF SOUTH CAROLINA

COUNTY OF HORRY

2025CV261090097  
CIVIL CASE NUMBER

IN THE MAGISTRATE'S COURT

SUMMONS

John Paul Miller  
4869 hwy 17 bypass  
Myrtle Beach, SC 29577

PLAINTIFF(S)

Vs

Kyler Marlowe

Myrtle Beach, SC 29577

DEFENDANT(S)

TO THE DEFENDANT(S) NAMED ABOVE:

**YOU ARE SUMMONED** and required to answer the allegations of the attached complaint and present any appropriate counterclaims/crossclaims to the attached Complaint within **THIRTY** days from the first day after receipt of this summons. Your Answer must be received by the:

Myrtle Beach Magistrate Court  
1201 21st Avenue North  
Myrtle Beach, SC 29577  
Phone: (843) 915-5293  
Fax: (843) 444-6131

If you fail to answer within the prescribed time, a judgment by default may be rendered against you for the amount or other remedy requested in the attached complaint, plus interest and costs. **If you desire a jury trial, you must request one in writing at least five (5) working days prior to the date set for trial.** If no jury trial is timely requested, the matter will be heard and decided by the Judge.

Given under my hand:

\_\_\_\_\_  
JUDGE

**READ ATTACHED INSTRUCTIONS CAREFULLY**

January 10, 2025

2025CV261090097

CIVIL CASE NUMBER

IN THE MAGISTRATE'S COURT

STATE OF SOUTH CAROLINA )

COUNTY OF HORRY )

JOHN PAUL MILLER )

PLAINTIFF )

STREET ADDRESS )

CITY, STATE ZIP )

TELEPHONE )

VS. )

KYLER MARLOWE )

DEFENDANT(S) )

STREET ADDRESS )

CITY, STATE ZIP )

TELEPHONE )

COMPLAINT

I, John Paul Miller, the plaintiff in this civil action do make the following claims:

1. I believe the defendant, KYLER MARLOWE, is a resident of Horry County, and resides at Myrtle Beach which is within Judge Arakas's magisterial jurisdiction or this Complaint is properly filed in Horry County.

2. I make this complaint on the following:

**See Attached Facts and Causes of Action** (Attach supplement if necessary)

3. I believe, because of the above information, that I am entitled to and do request a judgment for \$7,500.00 and/or other relief as below requested:

**Damages not to exceed Seven Thousand Five Hundred**

including any costs resulting in this action.

I state under penalty of perjury that the above is correct and truthful, except those based on my information and belief.

Dated: January 10, 2025

Signature of Plaintiff (or his attorney)

## **SUPPLEMENT TO PLAINTIFF'S COMPLAINT**

### **FACTS COMMON TO ALL COUNTS**

1. Defendant has engaged in a persistent pattern of harassment against Plaintiff, including posting or reposting statements about Plaintiff on social media, which are intended to paint Plaintiff in a false light and like a villain or criminal.

2. Defendant regularly posts false and inflammatory videos or comments about Plaintiff on social media, all of which cause Plaintiff severe emotional distress and public humiliation.

3. Defendant makes posts that falsely claim that she is in danger due to her own activity of stalking and harassing Plaintiff. These posts are intended to gain Defendant sympathy or publicity and to paint Plaintiff as an evil and dangerous man.

4. Defendant portrays herself as an advocate for victims of domestic violence or as someone who is investigating the death of Plaintiff's late wife.

5. Defendant solicits videos of Plaintiff from others on the internet and seeks engagement of her posts on Facebook and Tiktok.

6. Defendant does not actually help victims of any violence. In fact, Defendant only harasses and stalks the Plaintiff.

7. Defendant posts statements and videos about Plaintiff where she describes him as dangerous, an abuser, corrupt, and a murderer, and Plaintiff's late wife as a victim of his abuse and murder.

8. Defendant has posted pictures of Plaintiff's vehicle, Plaintiff's license plate, Plaintiff's home, and Plaintiff's work on social media and without Plaintiff's request or consent.

9. Defendant's conduct is intended to harm Plaintiff and enrich Defendant through publicity, status, and fame in a group of like-minded stalkers and through the monetization of social media accounts, channels, and platforms.

10. Much of Defendant's conduct is carried out under the guise that she is seeking justice for Plaintiff's late wife or protesting domestic violence, a crime that Plaintiff was never charged with committing and for which there is no factual basis.

11. The interest that a subset of people has in Plaintiff, and in the life of his late wife, was created entirely by Defendant and others like her who have determined on their own that Plaintiff is guilty of a crime that law enforcement officials have cleared him of or never charged him with committing.

12. Defendant has published false and defamatory statements about Plaintiff on various social media platforms, including Facebook and Tiktok, to damage Plaintiff's reputation and interfere with his livelihood and ministry.

13. Defendant's actions have been calculated to intimidate Plaintiff from appearing in public and conducting his normal activities, including the operation of his church.

14. Defendant's actions have been calculated to intimidate or influence others from congregating at Plaintiff's church or with Plaintiff in any setting.

15. Defendant's dissemination of false information, harassment, and intimidation of Plaintiff and those associated with him have interfered with Plaintiff's ability to live his life without interference from Defendant or others who are influenced by Defendant's actions.

16. As a direct result of Defendant's actions, friends and acquaintances of Plaintiff have expressed reluctance to be seen with Plaintiff or to do business with Plaintiff or his affiliated companies.

17. Defendant's harassment and intimidation of Plaintiff and those associated with him have interfered with Plaintiff's ability to earn a living, conduct church services, minister to his congregation, and maintain relationships with church members and the broader religious community.

18. As a direct result of the Defendant's actions, multiple church members have expressed reluctance to attend services and baptisms, and attendance and participation have declined.

19. Defendant's actions have created a dangerous environment for Plaintiff, placing him in fear for his safety and the safety of others.

20. Nothing being posted or stated about Plaintiff by Defendant is newsworthy or in the public interest.

**AS AND FOR A FIRST CAUSE OF ACTION**  
(Invasion of Privacy)

21. Plaintiff incorporates by reference all preceding paragraphs as if fully set forth herein.

22. Defendant engaged in a pattern of intentional, substantial, and unreasonable intrusion upon Plaintiff's life.

23. Defendant's actions served no legitimate purpose and would have caused a reasonable person to suffer substantial emotional distress.

24. Defendant intentionally intruded upon Plaintiff's private affairs and concerns.

25. The intrusion would be highly offensive to a reasonable person.

26. Defendant engaged in a pattern of words and conduct that served no legitimate purpose and caused Plaintiff to reasonably fear for his safety or suffer substantial emotional distress.

27. Defendant's conduct constitutes the unwarranted appropriation or exploitation of Plaintiff's personality and private affairs, with which the public has no legitimate concern, or the wrongful intrusion into Plaintiff's private activities in such a manner as to outrage or cause mental suffering, shame, or humiliation to a person of ordinary sensibilities.

28. Defendant invaded Plaintiff's right to privacy in one or more of the following ways: wrongfully appropriating Plaintiff's personality; publicizing Plaintiff's private affairs, which have no legitimate public concern; or wrongfully intruding into Plaintiff's private affairs.

29. Defendant's actions also violated South Carolina criminal statutes prohibiting harassment and stalking.

30. Law enforcement officers have refused to enforce criminal statutes enacted to protect people like the Plaintiff, leaving Plaintiff no choice but to bring this action.

31. As a direct and proximate result of Defendant's actions, Plaintiff has suffered damages, including emotional distress, reputational harm, anxiety, and other injuries, in an amount to be proven, but not more than \$7,500.00.



2025CV161090057

CIVIL CASE NUMBER

STATE OF SOUTH CAROLINA )

COUNTY OF HORRY )

JOHN PAUL MILLER )

PLAINTIFF(S) )

VS. )

KYLER MARLOWE )

DEFENDANT(S). )

IN THE MAGISTRATE'S COURT

AFFIDAVIT AND ITEMIZATION  
OF ACCOUNTS

Plaintiff, JOHN PAUL MILLER, personally appearing before me, who, being duly sworn, states that he is the plaintiff in this action, and that the itemization of accounts which follows is true and correct.

He further states that no part of the sum included in the itemization below has been paid or satisfied in any fashion, and is today due and owed to him.

ITEMIZATION OF ACCOUNTS

LOSS OF INCOME

\$7500

\$

\$

\$

\$

TOTAL

\$7,500.00

(Copies of bills, papers or other proof of any of the above accounts should be attached to this document.)

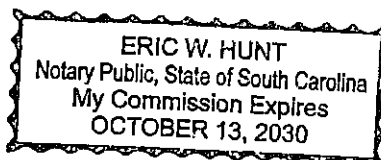
Sworn to and Subscribed before me  
this 10<sup>th</sup> day of January, 2025.

Magistrate or Notary Public for South Carolina

My Commission expires

10-13-2030

PLAINTIFF (or his attorney)



HORRY COUNTY  
MYRTLE BEACH SUMMARY COURT

CASE INFORMATION SHEET

CIVIL LAWSUIT

DATE FILED: 1-10-25

PLAINTIFF (YOU)

NAME/ADDRESS: John-Paul Miller HOME PHONE: \_\_\_\_\_  
4869 Highway 17 bypass EMPLOYER: \_\_\_\_\_  
MB SC 29577 FAX# \_\_\_\_\_  
WORK PHONE: \_\_\_\_\_  
ATTORNEY: \_\_\_\_\_ CELL PHONE: \_\_\_\_\_

DEFENDANT (THEM)

NAME/ADDRESS Kyler Marlowe HOME PHONE: \_\_\_\_\_  
[REDACTED] EMPLOYER: \_\_\_\_\_  
MB SC 29577 FAX # \_\_\_\_\_  
WORK PHONE: \_\_\_\_\_  
ATTORNEY: \_\_\_\_\_ CELL PHONE: \_\_\_\_\_

Amount of Suit: \$ 7500<sup>00</sup>  
(Maximum \$7500)

\*\*\* RETURN THIS AND ALL ATTACHED FORMS TO THE CIVIL CLERK\*\*\*

Myrtle Beach Magistrate  
1201 21<sup>st</sup> Avenue North  
Myrtle Beach, SC 29577  
843-915-5293

STATE OF SOUTH CAROLINA )

COUNTY OF HORRY )

**2025CV261090098**  
CIVIL CASE NUMBER

IN THE MAGISTRATE'S COURT

SUMMONS

John Paul Miller  
4869 hwy 17 bypass  
Myrtle Beach, SC 29577

---

PLAINTIFF(S)

Vs

Annie Plaggenborg

Myrtle Beach, SC 29577

---

DEFENDANT(S)

**TO THE DEFENDANT(S) NAMED ABOVE:**

**YOU ARE SUMMONED** and required to answer the allegations of the attached complaint and present any appropriate counterclaims/crossclaims to the attached Complaint within **THIRTY** days from the first day after receipt of this summons. Your Answer must be received by the:

**Myrtle Beach Magistrate Court**  
**1201 21st Avenue North**  
**Myrtle Beach, SC 29577**  
**Phone: (843) 915-5293**  
**Fax: (843) 444-6131**

If you fail to answer within the prescribed time, a judgment by default may be rendered against you for the amount or other remedy requested in the attached complaint, plus interest and costs. **If you desire a jury trial, you must request one in writing at least five (5) working days prior to the date set for trial.** If no jury trial is timely requested, the matter will be heard and decided by the Judge.

Given under my hand:

\_\_\_\_\_  
JUDGE

**READ ATTACHED INSTRUCTIONS CAREFULLY**

January 10, 2025

2025 CV 26109 0098  
CIVIL CASE NUMBER

STATE OF SOUTH CAROLINA )

COUNTY OF HORRY )

JOHN PAUL MILLER )

PLAINTIFF )

STREET ADDRESS )

CITY, STATE ZIP )

TELEPHONE )

VS. )

Annie Plaggenborg )

DEFENDANT(S) )

STREET ADDRESS )

CITY, STATE ZIP )

TELEPHONE )

IN THE MAGISTRATE'S COURT

COMPLAINT

I, John Paul Miller, the plaintiff in this civil action do make the following claims:

1. I believe the defendant, Annie Plaggenborg, is a resident of Horry County, and resides at Myrtle Beach which is within Judge Arakas's magisterial jurisdiction or this Complaint is properly filed in Horry County.

2. I make this complaint on the following:

**See Attached Facts and Causes of Action** (Attach supplement if necessary)

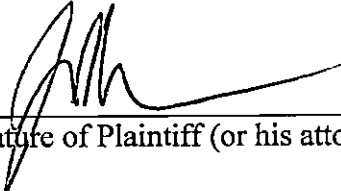
3. I believe, because of the above information, that I am entitled to and do request a judgment for \$7,500.00 and/or other relief as below requested:

**Damages not to exceed Seven Thousand Five Hundred**

including any costs resulting in this action.

I state under penalty of perjury that the above is correct and truthful, except those based on my information and belief.

Dated: January 10, 2025

  
Signature of Plaintiff (or his attorney)

## **SUPPLEMENT TO PLAINTIFF'S COMPLAINT**

### **FACTS COMMON TO ALL COUNTS**

1. Defendant has engaged in a persistent pattern of harassment against Plaintiff, including posting or reposting statements about Plaintiff on social media, which are intended to paint Plaintiff in a false light and like a villain or criminal.

2. Defendant regularly posts false and inflammatory videos or comments about Plaintiff on social media, all of which cause Plaintiff severe emotional distress and public humiliation.

3. Defendant portrays herself as an advocate for victims of domestic violence or as someone who is investigating the death of Plaintiff's late wife.

4. Defendant seeks engagement with her posts on Facebook and Tiktok in an effort to increase her views and standing in a sect of people who have assumed the role of attacking Plaintiff online and in person.

5. Defendant does not actually help victims of any violence. In fact, Defendant only harasses and stalks the Plaintiff through her posts, videos, comments, and actions.

6. Defendant posts statements and videos about Plaintiff where she describes him as dangerous, an abuser, corrupt, and a murderer, and Plaintiff's late wife as a victim of his abuse and murder.

7. Defendant's conduct is intended to harm Plaintiff and enrich Defendant through publicity, status, and fame in a group of like-minded stalkers and through the monetization of social media accounts, channels, and platforms.

8. Much of Defendant's conduct is carried out under the guise that she is seeking justice for Plaintiff's late wife or protesting domestic violence, a crime that Plaintiff was never charged with committing and for which there is no factual basis.

9. The interest that a subset of people has in Plaintiff, and in the life of his late wife, was created entirely by Defendant and others like her who have determined on their own that Plaintiff is guilty of a crime that law enforcement officials have cleared him of or never charged him with committing.

10. Defendant has published false and defamatory statements about Plaintiff on various social media platforms, including Facebook and Tiktok, to damage Plaintiff's reputation and interfere with his livelihood and ministry.

11. Defendant's actions have been calculated to intimidate Plaintiff from appearing in public and conducting his normal activities, including the operation of his church.

12. Defendant's actions have been calculated to intimidate or influence others from congregating at Plaintiff's church or with Plaintiff in any setting.

13. Defendant's dissemination of false information, harassment, and intimidation of Plaintiff and those associated with him have interfered with Plaintiff's ability to live his life without interference from Defendant or others who are influenced by Defendant's actions.

14. As a direct result of Defendant's actions, friends and acquaintances of Plaintiff have expressed reluctance to be seen with Plaintiff or to do business with Plaintiff or his affiliated companies.

15. Defendant's harassment and intimidation of Plaintiff and those associated with him have interfered with Plaintiff's ability to earn a living, conduct church services, minister to his

congregation, and maintain relationships with church members and the broader religious community.

16. As a direct result of the Defendant's actions, multiple church members have expressed reluctance to attend services and baptisms, and attendance and participation have declined.

17. Defendant's actions have created a dangerous environment for Plaintiff, placing him in fear for his safety and the safety of others.

18. Nothing being posted or stated about Plaintiff by Defendant is newsworthy or in the public interest.

**AS AND FOR A FIRST CAUSE OF ACTION**  
(Invasion of Privacy)

19. Plaintiff incorporates by reference all preceding paragraphs as if fully set forth herein.

20. Defendant engaged in a pattern of intentional, substantial, and unreasonable intrusion upon Plaintiff's life.

21. Defendant's actions served no legitimate purpose and would have caused a reasonable person to suffer substantial emotional distress.

22. Defendant intentionally intruded upon Plaintiff's private affairs and concerns.

23. The intrusion would be highly offensive to a reasonable person.

24. Defendant engaged in a pattern of words and conduct that served no legitimate purpose and caused Plaintiff to reasonably fear for his safety or suffer substantial emotional distress.

25. Defendant's conduct constitutes the unwarranted appropriation or exploitation of Plaintiff's personality and private affairs, with which the public has no legitimate concern, or the

wrongful intrusion into Plaintiff's private activities in such a manner as to outrage or cause mental suffering, shame, or humiliation to a person of ordinary sensibilities.

26. Defendant invaded Plaintiff's right to privacy in one or more of the following ways: wrongfully appropriating Plaintiff's personality; publicizing Plaintiff's private affairs, which have no legitimate public concern; or wrongfully intruding into Plaintiff's private affairs.

27. Defendant's actions also violated South Carolina criminal statutes prohibiting harassment and stalking.

28. Law enforcement officers have refused to enforce criminal statutes enacted to protect people like the Plaintiff, leaving Plaintiff no choice but to bring this action.

29. As a direct and proximate result of Defendant's actions, Plaintiff has suffered damages, including emotional distress, reputational harm, anxiety, and other injuries, in an amount to be proven, but not more than \$7,500.00.

**AS AND FOR A SECOND CAUSE OF ACTION**  
(Defamation)

30. Plaintiff incorporates by reference all preceding paragraphs as if fully set forth herein.

31. Defendant made false and defamatory statements concerning Plaintiff, specifically: Defendant posted a video claiming that Plaintiff groomed and trafficked his late wife.

32. Defendant published these statements to third parties by posting videos to Tiktok and Facebook.

33. The statements were false when made, and Defendant knew or should have known they were false.

34. The statements were defamatory per se in that they imputed to Plaintiff the commission of a crime; and imputed to Plaintiff serious sexual misconduct.



35. Plaintiff is entitled to damages against Defendant in an amount not to exceed \$7,500 for this case.



2025 CV 86103 0098

CIVIL CASE NUMBER

STATE OF SOUTH CAROLINA )

COUNTY OF HORRY )

JOHN PAUL MILLER )

PLAINTIFF(S) )

VS. )

ANNIE PLAGGENBORG )

DEFENDANT(S). )

IN THE MAGISTRATE'S COURT

AFFIDAVIT AND ITEMIZATION  
OF ACCOUNTS

Plaintiff, JOHN PAUL MILLER, personally appearing before me, who, being duly sworn, states that he is the plaintiff in this action, and that the itemization of accounts which follows is true and correct.

He further states that no part of the sum included in the itemization below has been paid or satisfied in any fashion, and is today due and owed to him.

ITEMIZATION OF ACCOUNTS

LOSS OF INCOME

\$7500

\$  
\$  
\$  
\$

TOTAL

\$7,500.00

(Copies of bills, papers or other proof of any of the above accounts should be attached to this document.)

Sworn to and Subscribed before me  
this 10<sup>th</sup> day of January, 2025.

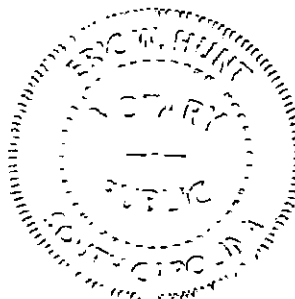
Magistrate or Notary Public for South Carolina

My Commission expires

10-13-2020

PLAINTIFF (or his attorney)

ERIC W. HUNT  
Notary Public, State of South Carolina  
My Commission Expires  
OCTOBER 13, 2030



HORRY COUNTY  
MYRTLE BEACH SUMMARY COURT

CASE INFORMATION SHEET

CIVIL LAWSUIT

DATE FILED: 1-10-25

PLAINTIFF (YOU)

NAME/ADDRESS: \_\_\_\_\_

HOME PHONE: \_\_\_\_\_

John-Paul Miller

EMPLOYER: \_\_\_\_\_

4869 Highway 17 bypass

FAX# \_\_\_\_\_

MB SC 29577

WORK PHONE: \_\_\_\_\_

ATTORNEY: \_\_\_\_\_

CELL PHONE: \_\_\_\_\_

DEFENDANT (THEM)

NAME/ADDRESS \_\_\_\_\_

HOME PHONE: \_\_\_\_\_

Annie plassenborg

EMPLOYER: \_\_\_\_\_

MB SC 29577

FAX # \_\_\_\_\_

WORK PHONE: \_\_\_\_\_

ATTORNEY: \_\_\_\_\_

CELL PHONE: \_\_\_\_\_

Amount of Suit: \$ \_\_\_\_\_

7500<sup>00</sup>

(Maximum \$7500)

\*\*\* RETURN THIS AND ALL ATTACHED FORMS TO THE CIVIL CLERK \*\*\*

Myrtle Beach Magistrate  
1201 21<sup>st</sup> Avenue North  
Myrtle Beach, SC 29577  
843-915-5293