

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

202501261090090

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 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)

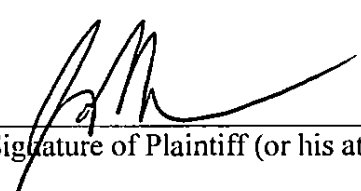
3. I believe, because of the above information, that I am entitled to and do request a judgment for \$7,500.00 and/or other relief as below requested:

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 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.

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: Jim G. Lancaster HOME PHONE: _____
[REDACTED] EMPLOYER: _____
MB SC 29588 FAX # _____
WORK PHONE: _____
ATTORNEY: _____ CELL PHONE: _____

Amount of Suit: \$ 7500⁰⁰
(Maximum \$7500)

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

Myrtle Beach Magistrate
1201 21st Avenue North
Myrtle Beach, SC 29577
843-915-5293