

STATE OF SOUTH CAROLINA)
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COUNTY OF HORRY)
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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
[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

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.

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 Marlove HOME PHONE: _____
[REDACTED] EMPLOYER: _____
MB SC 29577 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