

**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] Myrtle Beach, SC 29588.**

MYRTLE BEACH  
MAGISTRATE'S OFFICE  
2025 JAN 27 AM 11:47  
DISTRICT #4

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

**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*  
\_\_\_\_\_  
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.

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

Our Job Serial Number: VPL-2025000088

*[Signature]*  
NOTARY PUBLIC  
J ASHLEY GARRETT  
My Commission Expires  
September 27, 2031  
NOTARY PUBLIC  
STATE OF SOUTH CAROLINA

STATE OF SOUTH CAROLINA )  
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COUNTY OF HORRY )  
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2025CV261090089  
CIVIL CASE NUMBER  
  
IN THE MAGISTRATE'S COURT  
  
SUMMONS

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

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PLAINTIFF(S)

Vs

Melissa Pfeiffer  
[REDACTED]  
Myrtle Beach, SC 29588

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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 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.

COURTESY OF LUNA SHARK MEDIA



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 Melissa Pfeiffer 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