

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 CV 061090091
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))
)
) 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)

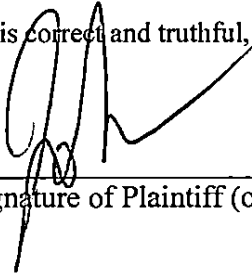
3. I believe, because of the above information, that I am entitled to and do request a judgment for \$7,500.00 and/or other relief as below requested:

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.

COURTESY OF
LUNA SHARK MEDIA

2025 CV 06109 0091

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STATE OF SOUTH CAROLINA)
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 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.

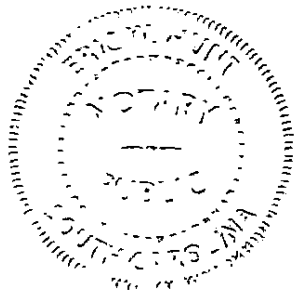
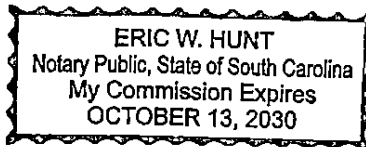
ITEMIZATION OF ACCOUNTS

LOSS OF INCOME	\$7500
	\$
	\$
	\$
	\$
TOTAL	<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)

 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: Kean Young HOME PHONE: _____
[REDACTED] EMPLOYER: _____
Myrtle Beach 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