

20 25 CP26 02622

STATE OF SOUTH CAROLINA )  
COUNTY OF HORRY )

CIVIL CASE NUMBER

2025CV261090096

IN THE MAGISTRATES COURT

CIVIL CASE REQUIRING TRANSFER  
TO COURT OF COMMON PLEAS

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

PLAINTIFF(S)

vs:

Alexandra [redacted] Cuozzo  
[redacted]  
Myrtle Beach, SC 29577-1897

DEFENDANT(S)

Philip S Coury  
2127 Park Street  
Columbia, SC 29201

DEFENDANT ATTORNEY

I find that the defendant in the above captioned civil case has filed a counterclaim with this court seeking damages in excess of the current civil jurisdiction of magistrate court, and such counterclaim does not fall within any jurisdictional exception found in SC Code §22-3-10. Therefore, pursuant to S.C. Code §22-3-30, this case shall be transferred to the Court of Common Pleas in this County. Accordingly,

IT IS ORDERED that the above captioned civil case be transferred to the Court of Common Pleas in this County and that no filing fee shall be required by that court from either party to this action, all in accordance with S.C. Code §22-3-30.

Dated: March 20, 2025

MAGISTRATE

Judge Christopher J Arakas

RENEEN N. ELVIS  
CLERK OF COURT  
HORRY COUNTY, SC

2025 MAR 26 P 4:30

FILED  
HORRY COUNTY

ORIGINAL

LUNASHARK MEDIA: EMPOWERING  
VICTIMS' VOICES THROUGH FOIA

STATE OF SOUTH CAROLINA )

2025CV261090096  
CIVIL CASE NUMBER

COUNTY OF HORRY )

IN THE MAGISTRATE'S COURT

CERTIFICATE OF TRANSMITTAL

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

PLAINTIFF(S)

Vs

Alexandra [REDACTED] Cuozzo  
[REDACTED]  
Myrtle Beach, SC 29577-1897

Philip S Coury  
2127 Park Street  
Columbia, SC 29201

DEFENDANT(S)

DEFENDANT ATTORNEY

The original complaint and all associated paper work in reference to the above listed civil case is being transmitted for disposition to the court listed below:

Date of Transmittal: March 20, 2025  
Transmitted to: Court of Common Pleas  
Transmitted by: Horry County Myrtle Beach Magistrate Court  
Civil Case No.: 2025CV261090096  
Comments: All pertaining documents enclosed.

Received and verified by [Signature] on 3/20/2025

FILED  
HORRY COUNTY  
2025 MAR 26 P 4:30  
RENEE N. ELVIS  
CLERK OF COURT  
HORRY COUNTY

ORIGINAL

COURTESY OF AN ANONYMOUS FOIA  
AROUND AND FIND OUT SPONSOR

**CENTRAL JURY CIVIL COURT  
CHECK LIST**

CASE NUMBER: 2025CV261090096

CASE TYPE: S/C

CASE TITLE: John Paul Miller vs Alexandra [REDACTED] Cuozzo

PLAINTIFF'S ATTORNEY: Pro Se

DEFENDANT'S ATTORNEY: Philip S Coury

DATE FILED: 01/10/2025

SERVICE DATE (DEFENDANT): 01/16/2025

SERVICE BY: Ps VPS Solutions Llc Anthony Marlowe

ANSWER DATE: 02/11/2025 COUNTER CLAIM DATE: 02/11/2025

SERVICE DATE (PLAINTIFF): 02/19/2025

SERVICE BY: Hcso Rabon

ANSWER DATE: 03/13/2025

SERVICE DATE (DEFENDANT): \_\_\_\_\_

MOTIONS: \_\_\_\_\_

02/14/2025 Motion for Removal to Court of Common Pleas

RULING: \_\_\_\_\_

NOTES: \_\_\_\_\_

Jury Trial Requested 02/11/2025

TRANSFER DATE: 03/20/2025

**ORIGINAL**

LUNASHARK MEDIA: EMPOWERING  
VICTIMS' VOICES THROUGH FOIA

COURTESY OF AN ANONYMOUS FOIA  
AROUND AND FIND OUT SPONSOR

STATE OF SOUTH CAROLINA )  
 )  
 COUNTY OF HORRY )  
 )  
 John Paul Miller, )  
 )  
 Plaintiff, )  
 )  
 vs. )  
 )  
 Alexandra Cuzzo, )  
 )  
 Defendant. )

IN THE MAGISTRATE'S COURT  
 Case No.: 2025CV261090096

ANSWER TO COUNTERCLAIMS

MYRTLE BEACH  
 MAGISTRATE'S OFFICE  
 2025 MAR 13 AM 11:29  
 DISTRICT #6

COMES NOW, the Plaintiff, appearing pro se, and hereby submits this Answer to Defendant's Counterclaims and states as follows:

**GENERAL DENIAL**

1. Plaintiff denies each and every allegation contained in Defendant's Counterclaims except as may be expressly admitted herein.

**RESPONSE TO FACTUAL ALLEGATIONS**

2. As to paragraphs 62 – 63, Plaintiff admits.
3. As to paragraph 64, Plaintiff denies that the counterclaims are based on any actual conduct but admits that the matters involved in this case occurred in Horry County.
4. As to paragraph 65, Plaintiff denies these allegations.
5. As to paragraph 66, Plaintiff admits that he was the Pastor as Solid Rock Church, which was located in Horry County. Plaintiff denies the remaining allegations contained in Paragraph 66.
6. As to paragraph 67, Plaintiff denies these allegations.
7. As to paragraph 68, Plaintiff denies that he made any announcement or comment on the death of his wife to the general public or that he voluntarily made his wife's death a matter of public controversy and interest.

FILED  
 Horry County  
 2025 MAR 26 PM 4:31  
 RENEE N. EAVIS  
 CLERK OF COURT  
 HORRY COUNTY, SC

LUNASHARK MEDIA: EMPOWERING VICTIMS' VOICES THROUGH FOIA

COURTESY OF AN ANONYMOUS FOIA AROUND AND FIND OUT SPONSOR

8. As to paragraph 69, Plaintiff denies that he created any public controversy or played a prominent role in creating and perpetuating any such controversy.

9. As to paragraph 70, Plaintiff denies all allegations and characterizations of Defendant's actions as peaceful or a protest.

10. As to paragraph 71, Plaintiff admits that he filed this lawsuit against Defendant on or about January 10, 2025, but denies that the allegations were without factual or legal basis.

11. As to paragraph 72, Plaintiff admits that he filed an action for a Restraining Order against Defendant on or about January 14, 2025, but denies that the remaining allegations in that paragraph.

12. As to paragraph 73, Plaintiff denies all allegations.

13. As to paragraph 74, Plaintiff denies all allegations. Plaintiff would further show that, due to the actions of Defendant and others like her, the congregants of the church were in fear for their safety and any action taken by them would have been to protect themselves.

#### **RESPONSE TO FIRST COUNTERCLAIM**

13. Plaintiff restates and incorporates by reference his responses to paragraphs 61-74.

14. As to paragraphs 75 – 80, Plaintiff denies each and every allegation contained therein.

#### **RESPONSE TO SECOND COUNTERCLAIM**

15. Plaintiff restates and incorporates by reference his responses to paragraphs 61-80.

16. As to paragraphs 81 – 87, Plaintiff denies each and every allegation contained therein.

#### **FIRST AFFIRMATIVE DEFENSE (Failure to State a Claim)**

17. Defendant's counterclaims fail to state claims upon which relief can be granted.

**SECOND AFFIRMATIVE DEFENSE**  
(Statutory Immunity)

18. Plaintiff's actions in filing a lawsuit and seeking a restraining order are protected by statutory immunity pursuant to S.C. Code § 16-3-1820, which provides immunity from liability for filing a report or complaint or participating in a judicial proceeding concerning alleged harassment or stalking.

WHEREFORE, Plaintiff respectfully requests that this Court:

- a) Dismiss Defendant's counterclaims with prejudice;
- b) Award Plaintiff the costs of this action;
- c) Grant such other and further relief as this Court deems just and proper.

Respectfully submitted,

  
\_\_\_\_\_  
John Paul Miller

March 13, 2025

LUNASHARK MEDIA: EMPOWERING  
VICTIMS' VOICES THROUGH FOIA

COURTESY OF AN ANONYMOUS FOIA  
SPONSOR

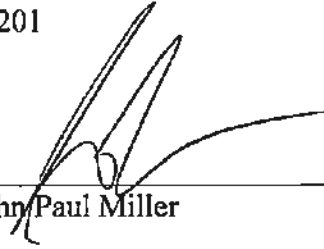
COURTESY OF AN ANONYMOUS FOIA  
AROUND AND FIND OUT SPONSOR



**CERTIFICATE OF SERVICE**

I hereby certify that on the 13th day of March, 2025, I served a copy of the foregoing Plaintiff's Answer to Defendant's Counterclaims and Affirmative Defenses upon counsel for the Defendant by depositing a true copy thereof in the United States Mail, first class postage prepaid, addressed as follows:

Philip S. Coury  
Coury Law, LLC  
2127 Park Street  
Columbia, SC 29201



John Paul Miller

LUNASHARK MEDIA: EMPOWERING  
VICTIMS' VOICES THROUGH FOIA

COURTESY OF  
LUNASHARK MEDIA

COURTESY OF AN ANONYMOUS FOIA  
AROUND AND FIND OUT SPONSOR

Rabon  
2-18

STATE OF SOUTH CAROLINA )  
COUNTY OF HORRY )

2025CV261090096  
CIVIL CASE NUMBER

IN THE MAGISTRATE'S COURT  
2025 FEB 12 PM AFFIDAVIT OF SERVICE FOR COUNTERCLAIM

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

HORRY COUNTY  
SHERIFF'S OFFICE



PLAINTIFF(S)

VS.

Alexandra [redacted] Cuozzo  
Myrtle Beach, SC 29577-1897

DEFENDANT(S)

FILED  
HORRY COUNTY  
2025 MAR 25 PM 4:31  
RENEE N. ELVIS  
CLERK OF COURT  
HORRY COUNTY, SC

PERSONALLY APPEARED BEFORE ME Bradley Rabon  
WHO, BEING DULY SWORN, SAYS THAT, ON THE 19 DAY OF Feb  
20 25, S/HE SERVED John Paul Miller  
THE PLAINTIFF ABOVE NAMED, BY DELIVERING COPIES THEREOF TO

PERSONALLY AND LEAVING THE SAME

WITH \_\_\_\_\_

AT 4869 Hwy 17 Bypass Myrtle Beach, SC 29577  
\_\_\_\_\_, THE PLACE OF RESIDENCE/WORK/OTHER OF SAID PLAINTIFF

AND THAT THE DEPONENT IS NOT A PARTY TO THIS ACTION.

UNABLE TO LOCATE AND SERVE THE ABOVE PROCESS ON THE PLAINTIFF AFTER DILIGENT EFFORTS TO DO SO. THE PROCESS IS RETURNED UNEXECUTED.

Bradley Rabon 188  
Deputy Sheriff/Constable/Process Server

02-19-2025 1432  
DATE

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

COURTESY OF AN ANONYMOUS FOIA  
AROUND AND FIND OUT SPONSOR



MYRTLE BEACH  
MAGISTRATE'S OFFICE

STATE OF SOUTH CAROLINA )

IN THE MAGISTRATE'S COURT

COUNTY OF HORRY )

FIFTHTEENTH JUDICIAL CIRCUIT

John Paul Miller, )

Civil Case Number: 2025CV261090096

Plaintiff, )

vs. )

**ANSWER AND COUNTERCLAIM  
(Jury Trial Demanded)**

Alexandra Cuzzo )

Defendant. )

2025 FEB 14 PM 7:26

DISTRICT #6

LUNASHARK MEDIA: EMPOWERING  
VICTIMS' VOICES THROUGH FOIA

Defendant Alexandra Cuzzo (hereinafter "Defendant"), by and through the undersigned counsel, while reserving the right to file a motion under Rule 12 of the South Carolina Rules of Civil Procedure or any other dispositive motion, hereby responds to Plaintiff John Paul Miller's (hereinafter "Plaintiff") Complaint by denying each and every allegation not hereinafter specifically admitted, by demanding strict proof thereof, and further responds as follows:

**FOR A FIRST DEFENSE AND BY WAY OF ANSWER**

1. Each and every allegation not herein admitted is hereby denied and strict proof thereof demanded.
2. Plaintiff's claims fail to state a claim upon which relief can be granted and/or fail to establish jurisdiction, and as such should be dismissed pursuant to Rule 12 of the South Carolina Rules of Civil Procedure.
3. In response to Paragraph 1, Defendant only denies the allegations that Defendant lives at [REDACTED] Myrtle Beach, SC 29577. Defendant admits the remaining allegations of Paragraph 1; however, reserves the right to contest jurisdiction of the Magistrates court based on Defendant's Counterclaim contained herein.

FILED  
HORRY COUNTY  
2025 MAR 26 P 4:31  
GENE N. ELVIS  
CLERK OF COURT  
HORRY COUNTY, SC

4. In response to Paragraph 2, Defendant denies any allegations of wrongdoing unless otherwise specifically stated herein. Defendant will respond to each supplemental allegation herein below.

5. In response to Paragraph 3, Defendant denies that Plaintiff is entitled to the requested relief.

6. Paragraph 1 of Supplement to Plaintiff's Complaint is denied.

7. In response to Paragraph 2 of Supplement to Plaintiff's Complaint, Defendant only admits to videoing Plaintiff from a public place, posting videos of him, and commenting about Plaintiff on social media. All remaining allegations are denied.

8. In response to Paragraph 3 of Supplement to Plaintiff's Complaint, Defendant only admits that she is a member of the group "Justice for Mica" which is a group that helps organize protestors to spread awareness regarding and peacefully protest against domestic violence.

9. Paragraph 4 of Supplement to Plaintiff's Complaint is denied.

10. In response to Paragraph 5 of Supplement to Plaintiff's Complaint, Defendant only admits to giving interviews about her involvement in peaceful protests. All remaining allegations are denied.

11. Paragraph 6 of Supplement to Plaintiff's Complaint is denied.

12. Paragraph 7 of Supplement to Plaintiff's Complaint is denied.

13. Paragraph 8 of Supplement to Plaintiff's Complaint is denied.

14. In response to Paragraph 9 of Supplement to Plaintiff's Complaint, Defendant only admits that Defendant does protest domestic violence, and upon

information and belief, Defendant admits that Plaintiff was never charged with committing domestic violence. All remaining allegations are denied.

15. Paragraph 10 of Supplement to Plaintiff's Complaint is denied.

16. Paragraph 11 of Supplement to Plaintiff's Complaint is denied.

17. Paragraph 12 of Supplement to Plaintiff's Complaint is denied.

18. Paragraph 13 of Supplement to Plaintiff's Complaint is denied.

19. Paragraph 14 of Supplement to Plaintiff's Complaint is denied.

20. Paragraph 15 of Supplement to Plaintiff's Complaint is denied. Defendant asserts that the allegations contained within Paragraph 15 are a direct result of Plaintiff's own actions rather than Defendant's actions.

21. Paragraph 16 of Supplement to Plaintiff's Complaint is denied.

22. Paragraph 17 of Supplement to Plaintiff's Complaint is denied. Defendant asserts that the allegations contained within Paragraph 17 are a direct result of Plaintiff's own actions rather than Defendant's actions.

23. Paragraph 18 of Supplement to Plaintiff's Complaint is denied.

24. Paragraph 19 of Supplement to Plaintiff's Complaint is denied.

25. In response to Paragraph 20 of Supplement to Plaintiff's Complaint, Defendant restates and realleges its response in Paragraphs 1 through 25 above.

26. Paragraph 21 of Supplement to Plaintiff's Complaint is denied.

27. Paragraph 22 of Supplement to Plaintiff's Complaint is denied.

28. Paragraph 23 of Supplement to Plaintiff's Complaint is denied.

29. Paragraph 24 of Supplement to Plaintiff's Complaint is denied.

30. Paragraph 25 of Supplement to Plaintiff's Complaint is denied.

- 31. Paragraph 26 of Supplement to Plaintiff's Complaint is denied.
- 32. Paragraph 27 of Supplement to Plaintiff's Complaint is denied.
- 33. Paragraph 28 of Supplement to Plaintiff's Complaint is denied.
- 34. Paragraph 29 of Supplement to Plaintiff's Complaint is denied.
- 35. Paragraph 30 of Supplement to to Plaintiff's Complaint is denied.
- 36. Any remaining allegations asserted by the Plaintiff not specifically addressed herein are hereby denied.

**FOR A SECOND DEFENSE**

37. The Complaint fails to set forth sufficient facts to constitute a cause of action and, therefore, should be dismissed pursuant to Rule 12(b)(6), SCRPC.

**FOR A THIRD DEFENSE**

38. Plaintiff's claims may be barred by the doctrine of truth.

**FOR A FOURTH DEFENSE**

39. Plaintiff's claims may be barred by the doctrine of consent.

**FOR A FIFTH DEFENSE**

40. Assuming *arguendo*, that privileged communications were shared, which is expressly denied by Defendant, any such privileged communications that were shared were done so in a legally protected context; thus, Plaintiff's claims are barred.

**FOR A SIXTH DEFENSE**

41. Assuming *arguendo*, that private information regarding the Plaintiff was shared with the public, which is expressly denied by Defendant, any such private information disclosed was related to a matter of legitimate public concern and/or was newsworthy and/or served a legitimate legal purpose; thus, Plaintiff's claims are barred.

**FOR A SEVENTH DEFENSE**

42. Any injuries or damages sustained by Plaintiff were due to and caused and occasioned by Plaintiff's own negligence, gross negligence, recklessness, willfulness, and wantonness which was the direct and proximate cause of Plaintiff's alleged injuries or damages, if any, and without which the same would not have occurred, and therefore, due to Plaintiff's sole negligence, gross negligence, recklessness, willfulness, and wantonness, Plaintiff's claims are barred.

**FOR AN EIGHTH DEFENSE**

43. Any injuries sustained by Plaintiff were due to and caused by the sole negligence of third persons over whom Defendant had no control, and therefore, Defendant should not be liable to Plaintiff in any sum whatsoever.

**FOR A NINTH DEFENSE**

44. Any injuries sustained by Plaintiff were due to and caused by the intervening and superseding acts of negligence, carelessness, recklessness, and gross negligence on the part of third persons as a proximate cause of injuries as alleged, if any, and therefore, Defendant should not be liable to Plaintiff in any sum whatsoever.

**FOR A TENTH DEFENSE**

45. Plaintiff's claims may be barred by the doctrine of estoppel.

**FOR A ELEVENTH DEFENSE**

46. Plaintiff's claims may be barred or otherwise reduced due to Plaintiff's failure to mitigate damages as required by law.

**FOR A TWELFTH DEFENSE**

47. Plaintiff is a public figure and is unable to show “actual malice” on the part of Defendant. Plaintiff has used his own pulpit to disclose personal and private facts about himself and his late wife prior to and after her passing, status of his marriage, and other similar personal and normally private facts. Plaintiff is also the author of at least one religious book. Plaintiff also regularly publicizes his sermons, promotes himself online, and has voluntarily participated in interviews with national news organizations and social media content creators. Plaintiff has propelled himself into the spotlight of the public, indicating consent to the publication of certain facts about his life and to that effect, has lost the right to claim these matters are private. As such, Plaintiff’s claims fail.

**FOR A THIRTEENTH DEFENSE**

48. Defendant asserts that some or all of the claims alleged against them are barred by applicable statutes of limitation and/or statutes of repose as well as the mandates of Rule 3(a)(2) of the South Carolina Rules of Civil Procedure.

**FOR A FOURTEENTH DEFENSE**

49. Any recovery by Plaintiff must be reduced or offset by amounts Plaintiff has received or will receive from others for the same injuries claimed in this lawsuit.

**FOR A FIFTEENTH DEFENSE**

50. Plaintiff is unable to demonstrate any substantial damage or injury; thus, Plaintiff’s claims are barred.



**FOR A SIXTEENTH DEFENSE**

51. Assuming *arguendo*, that Defendant engaged in the conduct described in Plaintiff's complaint, which is expressly denied, any such conduct was protected under the First Amendment of the Constitution of the United States of America and the Constitution of South Carolina. The First Amendment of Constitution of the United States of America and the Constitution of South Carolina both protect Defendant's freedom of speech which specifically allows her to formulate and express her own opinions and to associate and to peacefully assemble with others for expressive purposes. All actions, opinions, and/or assembly by Defendant has been an exercise of her right to free speech and association. As such, Plaintiff's complaint should be dismissed as an intrusion on Defendant's First Amendment rights.

**FOR A SEVENTEENTH DEFENSE**

52. Pursuant to *Cooper Industries, Inc. v. Leatherman Tool Group, Inc.*, 522 U.S. 424, 121 S.Ct. 1678 (2001), if punitive damages are recoverable, which is denied, the amount of punitive damages "[are] not really a fact tried by the jury;" therefore Plaintiff's request for punitive damages "to be determined by the jury" violates the United States Constitution.

**FOR AN EIGHTEENTH DEFENSE**

53. The U.S. Constitution's Due Process Clause "forbids a State to use a punitive damages award to punish a defendant for injury that it inflicts upon nonparties or those whom they directly [do not] represent," *Phillip Morris USA v. Williams*, 127 S.Ct. 1057, 1063 (U.S. 2007), and, therefore, to the extent that Plaintiff seek an award of punitive damages for potential or speculative harm to non-parties to the present action, such prayer

for relief is unconstitutional and must be struck from the pleadings and is otherwise inadmissible at trial.

**FOR A NINETEENTH DEFENSE**

54. Notwithstanding Defendant's prior defenses incorporating *Cooper Industries, Inc. v. Leatherman Tool Group, Inc.*, 522 U.S. 424 (2001) and *State Farm Mutual Automobile Insurance Company v. Campbell*, 538 U.S. 408 (2003), and the cases upon which they are based, in the event the trial court permits the jury to return a punitive damages award in the instant case, such damages are to be limited to an amount that is no greater than the jury's award of actual damages, as explicated within *Exxon Shipping Company v. Baker*, 128 S. Ct. 2605 (2008).

**FOR A TWENTIETH DEFENSE**

55. Defendant incorporates by reference any affirmative defenses raised by any other Defendant in this action. Defendant specifically reserves the right to assert additional defenses and/or affirmative defenses as may become available to them or revealed to them during the course of the investigation and/or discovery in this case.

**FOR A TWENTY-FIRST DEFENSE**

56. Defendant pleads any and all applicable rights and protections afforded to it under the South Carolina Fairness in Civil Justice Act of 2011, codified at South Carolina Code Annotated Sections 15-32-510 to 15-32-540, as a defense to Plaintiff's claims and/or request for an award of punitive damages. Accordingly, Plaintiff's claims are barred as a matter of law.

LUNASHARK MEDIA: EMPOWERING  
VICTIMS' VOICES THROUGH FOIA

**FOR A TWENTY-SECOND DEFENSE**

57. Defendant pleads that the truth of any allegedly slanderous statements as a complete defense to Plaintiff's slander claims. Accordingly, Plaintiff's claims are barred as a matter of law.

**FOR A TWENTY-THIRD DEFENSE**

58. Defendant pleads any and all applicable rights and protections afforded to it under the South Carolina Fairness in Civil Justice Act of 2011, codified at South Carolina Code Annotated Sections 15-32-510 to 15-32-540, as a defense to Plaintiff's claims and/or request for an award of punitive damages, including, but not limited to, any and all limitations and/or reductions to punitive damages (which are expressly denied).

**FOR A TWENTY-FOURTH DEFENSE**

59. Defendant pleads any and all other defenses which may be applicable and provided for by Rules 8 and 12 of the South Carolina Rules of Civil Procedure, by statute, by regulation, or by common law, as if set forth here verbatim.

**FOR A TWENTY-FIFTH DEFENSE**

60. Defendant reserves the right to assert any other defenses as may become apparent in discovery in this case.

**FOR A TWENTY-SIXTH DEFENSE**

61. Defendant incorporates by reference any and all defenses asserted by any other Defendants in their Answers to the Complaint and/or any subsequent Amended Answers to the Complaint.

**FOR A TWENTY-SEVENTH DEFENSE AND BY WAY COUNTERCLAIMS  
AGAINST THE PLAINTIFF:**

**FACTUAL BACKGROUND FOR COUNTERCLAIMS**

62. Defendant is a resident and citizen of Horry County, South Carolina.

63. Upon information and belief, Plaintiff is a resident and citizen of Horry County, South Carolina.

64. The following counterclaims arose out of conduct which occurred within Horry County, South Carolina.

65. The Horry County Magistrates is not the proper venue for this case, as the damages alleged herein in this counter-claim are in excess of \$7,500.00 and thus outside of the magisterial jurisdiction of this court. Defendant asserts that the Horry County Court of Common Pleas has jurisdiction over this matter and is the proper venue for this case. As such, Defendant respectfully requests that this case be removed to the Court of Common Pleas.

66. Upon information and belief, Plaintiff is a Pastor at Solid Rock Ministries Church, which is located at 803 Howard Avenue, Myrtle Beach, Horry County, South Carolina. As a Pastor, the Plaintiff holds a position of power at the church and is able to direct the action of employees and congregants of the church, as well as to direct church resources.

67. Plaintiff holds himself out as a public figure, regularly delivers sermons to his congregation from the pulpit, conducts interviews which are broadcasted nationally, and posted online on public forums, and has made statements to the public which pertain to his own private life, matters of public interest and his religious beliefs.

68. Plaintiff voluntarily announced and commented on the death of his wife to the public making a private matter a matter of public controversy and interest.

69. Plaintiff voluntarily engaged in the public controversy that he created and played a prominent role in the public controversy.

70. On or about May 5, 2024, Defendant began peacefully protesting domestic abuse by congregating with individuals with similar beliefs on a public sidewalk near 803 Howard Avenue, Myrtle Beach, Horry County, South Carolina.

71. On or about January 10, 2025, Plaintiff filed this lawsuit against Defendant, asserting allegations of wrongdoing without any factual or legal basis.

72. On or about January 14, 2025, Plaintiff filed an action for a Restraining Order against Defendant in the Horry County Magistrates Court asserting allegations of wrongdoing without any factual or legal basis.

73. Since the start of the protests in May of 2024 to present, Plaintiff, has engaged in a pattern of conduct to harass and intimidate Defendant as a means of silencing her voice and suppressing her right to free speech under the First Amendment of the United States Constitution and the South Carolina Constitution.

74. Upon information and belief, from the start of the protests in May of 2024, Plaintiff has used his position at his church and the church's resources, to direct congregants and/or agents of the church to engage in a pattern of conduct to harass, intimidate, and silence Defendant and other like-minded individuals.



**FOR A FIRST COUNTERCLAIM AGAINST THE PLAINTIFF:**  
**(Abuse of Process)**

75. Plaintiff has instituted this proceeding and other legal proceedings against the Defendant for an ulterior purpose, namely: to harass and intimidate Defendant, silence Defendant, and interfere with Defendant's rights to free association and freedom of speech.

76. The acts and conduct of the Plaintiff in instituting this proceeding and other legal proceedings are not proper.

77. Plaintiff intended to cause mental anguish to Defendant, and embarrassment to Defendant in the false allegations waged against Defendant.

78. Plaintiff's acts are willful in the use of process and not proper in the regular conduct of the proceeding.

79. As a proximate and direct result of Plaintiff's abuse of the judicial system Defendant has suffered damages in an amount greater than \$7,500.00.

80. Defendant is entitled actual and punitive damages as a result.

**FOR A SECOND COUNTERCLAIM AGAINST THE PLAINTIFF:**  
**(Intentional Infliction of Emotional Distress)**

81. Every allegation and defense above are incorporated herein by reference.

82. Defendant alleges that Plaintiff has intentionally and reckless inflicted severe emotional distress and was certain that such distress would result from Plaintiff's conduct.

83. The Plaintiff's conduct is so extreme and outrageous as to exceed all possible bounds of decency and must be regarded as atrocious, and utterly intolerable in a civilized society.

84. The actions of the Plaintiff have caused the Defendant to suffer from severe emotional distress.



85. The emotional distress suffered by the Defendant was so severe so that no reasonable person could be expected to endure it.

86. As a result of Plaintiff's conduct, the Defendant has suffered damages in an amount exceeding \$7,500.00, including without limitation, unnecessary and unreasonable stress, financial instability and stress, humiliation, and mental anguish and suffering.

**JURY TRIAL DEMAND**

87. Defendant respectfully request a jury trial as to all claims so triable in this action.

**WHEREFORE**, having fully answered Plaintiff's Complaint and asserted Counterclaims against the Plaintiff, Defendant respectfully request that:

- a) This matter be removed to the Court of Common Pleas for Horry County as damages are in excess of \$7,500.
- b) Plaintiff takes nothing by this action;
- c) a judgment of dismissal be entered in favor of Defendant;
- d) Defendant be awarded the costs of the suit incurred, including attorney's fees;
- e) Defendant be granted judgment against Plaintiff as well as costs and fees incurred in the investigation, defense, prosecution and settlement of this claim; and
- f) Defendant be awarded actual and punitive damages on Defendant's counterclaims;
- g) Defendant be awarded such other and further relief as this Honorable Court deems just and proper.

[SIGNATURE TO FOLLOW ON NEXT PAGE]

LUNASHARK MEDIA: EMPOWERING VICTIMS' VOICES THROUGH FOIA

Respectfully submitted,

COURY LAW, LLC

By: 

Philip S. Coury  
Bar Number: 104619  
pcoury@coury-law.com  
2127 Park Street  
Columbia, SC 29201  
803.293.5189 (voice)

ATTORNEY FOR DEFENDANT  
ALEXANDRA CUOZZO

February 11, 2025  
Columbia, South Carolina

COURTESY OF  
LUNASHARK MEDIA

Certificate of Service

The undersigned counsel for the Defendant hereby certifies that on the 11<sup>th</sup> day of February 2025, he served a copy of the foregoing document upon the Plaintiff by U.S. Mail to his address at 4869 Hwy 17 Bypass S, Myrtle Beach, SC 29577 and via email to



COURY LAW, LLC

By:

A handwritten signature in black ink, appearing to read 'P. S. Coury', written over a horizontal line.

Philip S. Coury  
Bar Number: 104619  
pcoury@coury-law.com  
2127 Park Street  
Columbia, SC 29201  
803.293.5189 (voice)

Attorney for Defendant

LUNASHARK MEDIA: EMPOWERING  
VICTIMS' VOICES THROUGH FOIA

COURTESY OF AN ANONYMOUS FOIA  
LUNASHARK MEDIA

LUNASHARK MEDIA: EMPOWERING VICTIMS' VOICES THROUGH FOIA

MYRTLE BEACH  
MAGISTRATE'S OFFICE  
STATE OF SOUTH CAROLINA )

IN THE MAGISTRATE'S COURT

2025 FEB 14 PM 7:26  
COUNTY OF HORRY )

FIFTHTEENTH JUDICIAL CIRCUIT

DISTRICT #6 )

John Paul Miller, )  
Plaintiff, )

Civil Case Number: 2025CV261090096

vs. )

**MOTION FOR REMOVAL**

Alexandra Cuzzo )  
Defendant. )

COMES NOW the Defendant Alexandra Cuzzo ("Defendant"), by and through undersigned counsel, and moves this Honorable Court to remove this action to the Circuit Court pursuant to S.C. Code Ann. § 22-3-30. The grounds for this motion are as follows:

1. This action was commenced in Magistrate Court on January 10, 2025.
2. Defendant timely filed an Answer with Counterclaims on February 10, 2025.
3. Defendant's Counterclaims seek damages in excess of \$7,500.00, which exceeds this Court's jurisdictional limit of \$7,500.00 as set forth in S.C. Code Ann. § 22-3-10.
4. Pursuant to S.C. Code Ann. § 22-3-30, when a counterclaim exceeds the civil jurisdictional amount of the magistrate's court, the entire case must be transferred to the circuit court.
5. The Court of Common Pleas for Horry County has proper jurisdiction over this matter pursuant to S.C. Code Ann. § 14-5-350.

FILED  
HORRY COUNTY  
2025 FEB 26 PM 4:32  
RENEE N. ELVIS  
CLERK OF COURT  
HORRY COUNTY, SC

**WHEREFORE**, Defendant respectfully requests that this Court:

- a) Remove this action to the Court of Common Pleas for Horry County;
- b) Direct the Clerk to transfer all pleadings and documents to the Horry County Court of Common Pleas; and
- c) Grant such other relief as this Court deems just and proper.

[SIGNATURE TO FOLLOW ON NEXT PAGE]

COURTESY OF AN ANONYMOUS FOIA  
AROUND AND ABOUT SPONSOR

LUNASHARK MEDIA: EMPOWERING VICTIMS' VOICES THROUGH FOIA

Respectfully submitted,

COURY LAW, LLC

By: 

Philip S. Coury  
Bar Number: 104619  
pcoury@coury-law.com  
2127 Park Street  
Columbia, SC 29201  
803.293.5189 (voice)

Attorney for Defendant

February 11, 2025  
Columbia, South Carolina

COURTESY OF LUNASHARK MEDIA

COURTESY OF AN ANONYMOUS FOIA AROUND AND ABOUT SPONSOR

Certificate of Service

The undersigned counsel for the Defendant hereby certifies that on the 11<sup>th</sup> day of February 2025, he served a copy of the foregoing document upon the Plaintiff by U.S. Mail to his address at 4869 Hwy 17 Bypass S, Myrtle Beach, SC 29577 and via email to



COURY LAW, LLC

By:

A handwritten signature in black ink, appearing to read 'P. Coury', written over a horizontal line.

Philip S. Coury  
Bar Number: 104619  
pcoury@coury-law.com  
2127 Park Street  
Columbia, SC 29201  
803.293.5189 (voice)

Attorney for Defendant

LUNASHARK MEDIA: EMPOWERING VICTIMS' VOICES THROUGH FOIA

COURTESY OF AN ANONYMOUS FOIA REQUESTOR  
LUNASHARK MEDIA



# COURY LAW, LLC

Philip S. Coury, Esquire  
2127 Park Street  
Columbia SC, 29201  
pcoury@Coury-Law.com  
803.293.5189

MYRTLE BEACH  
MAGISTRATE'S OFFICE  
2025 FEB 14 PM 7:26  
DISTRICT #6

February 11, 2025

**VIA US MAIL AND FACISMILE:**

Clerk of Court  
Myrtle Beach Magistrate Court  
1201 21<sup>st</sup> Avenue North  
Myrtle Beach, SC 29577  
843.444.6131

FILED  
HORRY COUNTY  
2025 MAR 26 PM 4:22  
RENEE N. ELYS  
CLERK OF COURT  
HORRY COUNTY, SC

Re: My Client: Alexandra Cuozzo  
Civil Action Number: 2025CV261090096  
Case Name: *John Paul Miller v. Alexandra Cuozzo*

**Letter of Representation:**

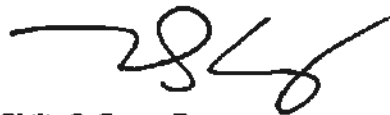
Honorable Clerk of Court,

Please be advised that I have been retained to represent Alexandra Cuozzo, in relation to the above-referenced lawsuit. Please direct all further correspondence directly to me.

Please find enclosed with this letter for filing: my Notice of Appearance, Defendant's Answer and Counterclaims, and Defendant's Motion to Remove, for filing.

Should you have any questions, please do not hesitate to contact me via email at [pcoury@coury-law.com](mailto:pcoury@coury-law.com) or by phone at 803-293-5189.

Very Truly Yours,



Philip S. Coury, Esquire

PSC  
*Enclosure*

LUNASHARK MEDIA: EMPOWERING VICTIMS' VOICES THROUGH FOIA

STATE OF SOUTH CAROLINA )  
 )  
COUNTY OF HORRY )  
 )  
John Paul Miller, )  
 ) Plaintiff, )  
 )  
vs. )  
 )  
Alexandra Cuzzo )  
 ) Defendant. )

IN THE MAGISTRATE'S COURT  
FIFTHTEENTH JUDICIAL CIRCUIT  
Civil Case Number: 2025CV261090096

**NOTICE OF APPEARANCE**

Now comes the undersigned counsel and hereby enters his appearance as legal counsel for the Defendant with respect to all matters and proceedings in this henceforth.

MYRTLE BEACH  
MAGISTRATE'S OFFICE

2025 FEB 14 PM 7:26  
DISTRICT #6

Respectfully submitted,

COURY LAW, LLC

By:



Philip S. Coury  
Bar Number: 104619  
pcoury@coury-law.com  
2127 Park Street  
Columbia, SC 29201  
803.293.5189 (voice)

Attorney for Defendant

February 11, 2025  
Columbia, South Carolina

FILED  
HORRY COUNTY  
2025 MAR 26 P 4:32  
RENEE N. ELVIS  
CLERK OF COURT  
HORRY COUNTY, SC

Certificate of Service

The undersigned counsel for the Defendant hereby certifies that on the 11<sup>th</sup> day of February 2025, he served a copy of the foregoing document upon the Plaintiff by U.S. Mail to his address at 4869 Hwy 17 Bypass S, Myrtle Beach, SC 29577 and via email to



COURY LAW, LLC

By:

A handwritten signature in black ink, appearing to read 'P. Coury', written over a horizontal line.

Philip S. Coury  
Bar Number: 104619  
pcoury@coury-law.com  
2127 Park Street  
Columbia, SC 29201  
803.293.5189 (voice)

Attorney for Defendant

LUNASHARK MEDIA: EMPOWERING VICTIMS' VOICES THROUGH FOIA

COURTESY OF AN ANONYMOUS FOIA REQUESTOR WITHOUT SPONSOR  
LUNASHARK MEDIA

LUNASHARK MEDIA: EMPOWERING VICTIMS' VOICES THROUGH FOIA

Notice of Status Conference 2-20-2025 @ 2PM

STATE OF SOUTH C  
COUNTY OF HC

From Faulk, Renee <FaulkR@horrycountysc.gov>  
Date Fri 2/14/2025 11:56 AM  
To pcoury@Coury-Law.com <pcoury@Coury-Law.com>

1 attachment (83 KB)  
Coury.pdf;

Philip Coury  
2127 Park Street  
Columbia, SC 29201

MAGISTRATE SU

You are hereby summoned to be and appear persona

Myrtle Beach Magistrate Court  
1201 21st Avenue North  
Myrtle Beach, SC

**Renee Faulk**  
Myrtle Beach Magistrate Court  
1201 21st Avenue N.,  
Myrtle Beach, 29577  
faulkR@horrycounty.org  
Tel: (843) 915-7711  
Fax: (843) 444-6131

on February 20, 2025 at 2:00 PM to serve as a pat  
the case of:

RE: John Paul Miller Vs

PLAINTIFF(S)

DEFENDANT(S)

Civil Case Number: ~~2025CV261090096~~ Summons & Compl PS.

HEREIN FAIL NOT, ON PAIN OF FORFEITING THE LAWFUL PENALTY IN  
SUCH CASE MADE AND PROVIDED.

JUDGE

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

February 14, 2025

COURTESY OF AN ANONYMOUS FOIA  
AROUND AND FIND OUT SPONSOR

STATE OF SOUTH CAROLINA  
COUNTY OF HORRY

*Status  
conference*

Philip Coury  
2127 Park Street  
Columbia, SC 29201

**MAGISTRATE SUMMONS**

You are hereby summoned to be and appear personally in the

**Myrtle Beach Magistrate Court  
1201 21st Avenue North  
Myrtle Beach, SC**

on **February 20, 2025** at **2:00 PM** to serve as a party in a Status Conference Hearing in the case of:

**RE: John Paul Miller Vs Alexandra [redacted] Cuzzo**

PLAINTIFF(S)

DEFENDANT(S)

Civil Case Number: **2025CV261090096, Summons & Compl PS.**

**HEREIN FAIL NOT, ON PAIN OF FORFEITING THE LAWFUL PENALTY IN  
SUCH CASE MADE AND PROVIDED.**

\_\_\_\_\_  
JUDGE

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

*emailed*

**February 14, 2025**

COURTESY OF AN ANONYMOUS FOIA  
AROUND AND FIND OUT SPONSOR

LUNASHARK MEDIA: EMPOWERING  
VICTIMS' VOICES THROUGH FOIA

**STATE OF SOUTH CAROLINA  
COUNTY OF HORRY**

Alexandra Cuozzo

Myrtle Beach, SC 29577-1897

**MAGISTRATE SUMMONS**

You are hereby summoned to be and appear personally in the

**Myrtle Beach Magistrate Court  
1201 21st Avenue North  
Myrtle Beach, SC**

on **February 20, 2025** at **2:00 PM** to serve as a party in a Status Conference Hearing in the case of:

**RE: John Paul Miller**

**Vs**

**Alexandra Golden Cuozzo**

\_\_\_\_\_  
PLAINTIFF(S)

\_\_\_\_\_  
DEFENDANT(S)

Civil Case Number: **2025CV261090096, Summons & Compl PS.**

**HEREIN FAIL NOT, ON PAIN OF FORFEITING THE LAWFUL PENALTY IN  
SUCH CASE MADE AND PROVIDED.**

\_\_\_\_\_  
JUDGE

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

**February 14, 2025**

**COURTESY OF AN ANONYMOUS FOIA  
AROUND AND FIND OUT SPONSOR**



**STATE OF SOUTH CAROLINA  
COUNTY OF HORRY**

John Miller  
4869 Highway 17 Bypass  
Myrtle Beach, SC 29577

**MAGISTRATE SUMMONS**

You are hereby summoned to be and appear personally in the

**Myrtle Beach Magistrate Court  
1201 21st Avenue North  
Myrtle Beach, SC**

on **February 20, 2025 at 2:00 PM** to serve as a party in a Status Conference Hearing in the case of:

**RE: John Paul Miller**

**Vs**

**Alexandra [REDACTED] Cuozzo**

\_\_\_\_\_  
**PLAINTIFF(S)**

\_\_\_\_\_  
**DEFENDANT(S)**

**Civil Case Number: 2025CV261090096, Summons & Compl PS.**

**HEREIN FAIL NOT, ON PAIN OF FORFEITING THE LAWFUL PENALTY IN  
SUCH CASE MADE AND PROVIDED.**

\_\_\_\_\_  
**JUDGE**

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

**February 14, 2025**

**COURTESY OF AN ANONYMOUS FOIA  
AROUND AND FIND OUT SPONSOR**

STATE OF SOUTH CAROLINA )

COUNTY OF HORRY )

2025CV261090096  
CIVIL CASE NUMBER

IN THE MAGISTRATE'S COURT

SUMMONS  
TO COUNTERCLAIM

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

PLAINTIFF(S)

Vs

Alexandra [REDACTED] Cuozzo

[REDACTED]  
Myrtle Beach, SC 29577-1897

DEFENDANT(S)

TO THE PLAINTIFF(S) NAMED ABOVE:

**YOU ARE SUMMONED** and required to Answer the allegations in the attached Counterclaim 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 will be rendered against you for the amount or other remedy requested in the attached Counterclaim, plus interest and costs.

Given Under My Hand:

\_\_\_\_\_  
JUDGE

**READ ATTACHED INSTRUCTIONS CAREFULLY**

February 11, 2025

COURTESY OF AN ANONYMOUS FOIA  
AROUND AND FIND OUT SPONSOR

LUNASHARK MEDIA: EMPOWERING VICTIMS' VOICES THROUGH FOIA

STATE OF SOUTH CAROLINA )  
 )  
COUNTY OF HORRY )  
 )  
John Paul Miller, )  
 )  
Plaintiff, )  
 )  
vs. )  
 )  
Alexandra Cuzzo )  
 )  
Defendant. )  
 )

IN THE MAGISTRATE'S COURT  
FIFTHTEENTH JUDICIAL CIRCUIT  
Civil Case Number: 2025CV261090096

ANSWER AND COUNTERCLAIM  
(Jury Trial Demanded)

FILED  
MAGISTRATE'S OFFICE  
MYRTLE BEACH  
2025 FEB 11 AM 11:21  
DISTRICT 16

Defendant Alexandra Cuzzo (hereinafter "Defendant"), by and through the undersigned counsel, while reserving the right to file a motion under Rule 12 of the South Carolina Rules of Civil Procedure or any other dispositive motion, hereby responds to Plaintiff John Paul Miller's (hereinafter "Plaintiff") Complaint by denying each and every allegation not hereinafter specifically admitted, by demanding strict proof thereof, and further responds as follows:

**FOR A FIRST DEFENSE AND BY WAY OF ANSWER**

1. Each and every allegation not herein admitted is hereby denied and strict proof thereof demanded.
2. Plaintiff's claims fail to state a claim upon which relief can be granted and/or fail to establish jurisdiction, and as such should be dismissed pursuant to Rule 12 of the South Carolina Rules of Civil Procedure.
3. In response to Paragraph 1, Defendant only denies the allegations that Defendant lives at [REDACTED] Myrtle Beach, SC 29577. Defendant admits the remaining allegations of Paragraph 1; however, reserves the right to contest jurisdiction of the Magistrates court based on Defendant's Counterclaim contained herein.

FILED  
HORRY COUNTY  
2025 MAR 26 P 4:32  
GENEE N. ELVIS  
CLERK OF COURT  
HORRY COUNTY, SC

4. In response to Paragraph 2, Defendant denies any allegations of wrongdoing unless otherwise specifically stated herein. Defendant will respond to each supplemental allegation herein below.

5. In response to Paragraph 3, Defendant denies that Plaintiff is entitled to the requested relief.

6. Paragraph 1 of Supplement to Plaintiff's Complaint is denied.

7. In response to Paragraph 2 of Supplement to Plaintiff's Complaint, Defendant only admits to videoing Plaintiff from a public place, posting videos of him, and commenting about Plaintiff on social media. All remaining allegations are denied.

8. In response to Paragraph 3 of Supplement to Plaintiff's Complaint, Defendant only admits that she is a member of the group "Justice for Mica" which is a group that helps organize protestors to spread awareness regarding and peacefully protest against domestic violence.

9. Paragraph 4 of Supplement to Plaintiff's Complaint is denied.

10. In response to Paragraph 5 of Supplement to Plaintiff's Complaint, Defendant only admits to giving interviews about her involvement in peaceful protests. All remaining allegations are denied.

11. Paragraph 6 of Supplement to Plaintiff's Complaint is denied.

12. Paragraph 7 of Supplement to Plaintiff's Complaint is denied.

13. Paragraph 8 of Supplement to Plaintiff's Complaint is denied.

14. In response to Paragraph 9 of Supplement to Plaintiff's Complaint, Defendant only admits that Defendant does protest domestic violence, and upon

information and belief, Defendant admits that Plaintiff was never charged with committing domestic violence. All remaining allegations are denied.

15. Paragraph 10 of Supplement to Plaintiff's Complaint is denied.

16. Paragraph 11 of Supplement to Plaintiff's Complaint is denied.

17. Paragraph 12 of Supplement to Plaintiff's Complaint is denied.

18. Paragraph 13 of Supplement to Plaintiff's Complaint is denied.

19. Paragraph 14 of Supplement to Plaintiff's Complaint is denied.

20. Paragraph 15 of Supplement to Plaintiff's Complaint is denied. Defendant asserts that the allegations contained within Paragraph 15 are a direct result of Plaintiff's own actions rather than Defendant's actions.

21. Paragraph 16 of Supplement to Plaintiff's Complaint is denied.

22. Paragraph 17 of Supplement to Plaintiff's Complaint is denied. Defendant asserts that the allegations contained within Paragraph 17 are a direct result of Plaintiff's own actions rather than Defendant's actions.

23. Paragraph 18 of Supplement to Plaintiff's Complaint is denied.

24. Paragraph 19 of Supplement to Plaintiff's Complaint is denied.

25. In response to Paragraph 20 of Supplement to Plaintiff's Complaint, Defendant restates and realleges its response in Paragraphs 1 through 25 above.

26. Paragraph 21 of Supplement to Plaintiff's Complaint is denied.

27. Paragraph 22 of Supplement to Plaintiff's Complaint is denied.

28. Paragraph 23 of Supplement to Plaintiff's Complaint is denied.

29. Paragraph 24 of Supplement to Plaintiff's Complaint is denied.

30. Paragraph 25 of Supplement to Plaintiff's Complaint is denied.

31. Paragraph 26 of Supplement to Plaintiff's Complaint is denied.
32. Paragraph 27 of Supplement to Plaintiff's Complaint is denied.
33. Paragraph 28 of Supplement to Plaintiff's Complaint is denied.
34. Paragraph 29 of Supplement to Plaintiff's Complaint is denied.
35. Paragraph 30 of Supplement to to Plaintiff's Complaint is denied.
36. Any remaining allegations asserted by the Plaintiff not specifically addressed herein are hereby denied.

**FOR A SECOND DEFENSE**

37. The Complaint fails to set forth sufficient facts to constitute a cause of action and, therefore, should be dismissed pursuant to Rule 12(b)(6), SCRPC.

**FOR A THIRD DEFENSE**

38. Plaintiff's claims may be barred by the doctrine of truth.

**FOR A FOURTH DEFENSE**

39. Plaintiff's claims may be barred by the doctrine of consent.

**FOR A FIFTH DEFENSE**

40. Assuming *arguendo*, that privileged communications were shared, which is expressly denied by Defendant, any such privileged communications that were shared were done so in a legally protected context; thus, Plaintiff's claims are barred.

**FOR A SIXTH DEFENSE**

41. Assuming *arguendo*, that private information regarding the Plaintiff was shared with the public, which is expressly denied by Defendant, any such private information disclosed was related to a matter of legitimate public concern and/or was newsworthy and/or served a legitimate legal purpose; thus, Plaintiff's claims are barred.



**FOR A SEVENTH DEFENSE**

42. Any injuries or damages sustained by Plaintiff were due to and caused and occasioned by Plaintiff's own negligence, gross negligence, recklessness, willfulness, and wantonness which was the direct and proximate cause of Plaintiff's alleged injuries or damages, if any, and without which the same would not have occurred, and therefore, due to Plaintiff's sole negligence, gross negligence, recklessness, willfulness, and wantonness, Plaintiff's claims are barred.

**FOR AN EIGHTH DEFENSE**

43. Any injuries sustained by Plaintiff were due to and caused by the sole negligence of third persons over whom Defendant had no control, and therefore, Defendant should not be liable to Plaintiff in any sum whatsoever.

**FOR A NINTH DEFENSE**

44. Any injuries sustained by Plaintiff were due to and caused by the intervening and superseding acts of negligence, carelessness, recklessness, and gross negligence on the part of third persons as a proximate cause of injuries as alleged, if any, and therefore, Defendant should not be liable to Plaintiff in any sum whatsoever.

**FOR A TENTH DEFENSE**

45. Plaintiff's claims may be barred by the doctrine of estoppel.

**FOR A ELEVENTH DEFENSE**

46. Plaintiff's claims may be barred or otherwise reduced due to Plaintiff's failure to mitigate damages as required by law.

**FOR A TWELFTH DEFENSE**

47. Plaintiff is a public figure and is unable to show "actual malice" on the part of Defendant. Plaintiff has used his own pulpit to disclose personal and private facts about himself and his late wife prior to and after her passing, status of his marriage, and other similar personal and normally private facts. Plaintiff is also the author of at least one religious book. Plaintiff also regularly publicizes his sermons, promotes himself online, and has voluntarily participated in interviews with national news organizations and social media content creators. Plaintiff has propelled himself into the spotlight of the public, indicating consent to the publication of certain facts about his life and to that effect, has lost the right to claim these matters are private. As such, Plaintiff's claims fail.

**FOR A THIRTEENTH DEFENSE**

48. Defendant asserts that some or all of the claims alleged against them are barred by applicable statutes of limitation and/or statutes of repose as well as the mandates of Rule 3(a)(2) of the South Carolina Rules of Civil Procedure.

**FOR A FOURTEENTH DEFENSE**

49. Any recovery by Plaintiff must be reduced or offset by amounts Plaintiff has received or will receive from others for the same injuries claimed in this lawsuit.

**FOR A FIFTEENTH DEFENSE**

50. Plaintiff is unable to demonstrate any substantial damage or injury; thus, Plaintiff's claims are barred.

**FOR A SIXTEENTH DEFENSE**

51. Assuming *arguendo*, that Defendant engaged in the conduct described in Plaintiff's complaint, which is expressly denied, any such conduct was protected under the First Amendment of the Constitution of the United States of America and the Constitution of South Carolina. The First Amendment of Constitution of the United States of America and the Constitution of South Carolina both protect Defendant's freedom of speech which specifically allows her to formulate and express her own opinions and to associate and to peacefully assemble with others for expressive purposes. All actions, opinions, and/or assembly by Defendant has been an exercise of her right to free speech and association. As such, Plaintiff's complaint should be dismissed as an intrusion on Defendant's First Amendment rights.

**FOR A SEVENTEENTH DEFENSE**

52. Pursuant to *Cooper Industries, Inc. v. Leatherman Tool Group, Inc.*, 522 U.S. 424, 121 S.Ct. 1678 (2001), if punitive damages are recoverable, which is denied, the amount of punitive damages "[are] not really a fact tried by the jury;" therefore Plaintiff's request for punitive damages "to be determined by the jury" violates the United States Constitution.

**FOR AN EIGHTEENTH DEFENSE**

53. The U.S. Constitution's Due Process Clause "forbids a State to use a punitive damages award to punish a defendant for injury that it inflicts upon nonparties or those whom they directly [do not] represent," *Phillip Morris USA v. Williams*, 127 S.Ct. 1057, 1063 (U.S. 2007), and, therefore, to the extent that Plaintiff seek an award of punitive damages for potential or speculative harm to non-parties to the present action, such prayer

for relief is unconstitutional and must be struck from the pleadings and is otherwise inadmissible at trial.

**FOR A NINETEENTH DEFENSE**

54. Notwithstanding Defendant's prior defenses incorporating *Cooper Industries, Inc. v. Leatherman Tool Group, Inc.*, 522 U.S. 424 (2001) and *State Farm Mutual Automobile Insurance Company v. Campbell*, 538 U.S. 408 (2003), and the cases upon which they are based, in the event the trial court permits the jury to return a punitive damages award in the instant case, such damages are to be limited to an amount that is no greater than the jury's award of actual damages, as explicated within *Exxon Shipping Company v. Baker*, 128 S. Ct. 2605 (2008).

**FOR A TWENTIETH DEFENSE**

55. Defendant incorporates by reference any affirmative defenses raised by any other Defendant in this action. Defendant specifically reserves the right to assert additional defenses and/or affirmative defenses as may become available to them or revealed to them during the course of the investigation and/or discovery in this case.

**FOR A TWENTY-FIRST DEFENSE**

56. Defendant pleads any and all applicable rights and protections afforded to it under the South Carolina Fairness in Civil Justice Act of 2011, codified at South Carolina Code Annotated Sections 15-32-510 to 15-32-540, as a defense to Plaintiff's claims and/or request for an award of punitive damages. Accordingly, Plaintiff's claims are barred as a matter of law.

**FOR A TWENTY-SECOND DEFENSE**

57. Defendant pleads that the truth of any allegedly slanderous statements as a complete defense to Plaintiff's slander claims. Accordingly, Plaintiff's claims are barred as a matter of law.

**FOR A TWENTY-THIRD DEFENSE**

58. Defendant pleads any and all applicable rights and protections afforded to it under the South Carolina Fairness in Civil Justice Act of 2011, codified at South Carolina Code Annotated Sections 15-32-510 to 15-32-540, as a defense to Plaintiff's claims and/or request for an award of punitive damages, including, but not limited to, any and all limitations and/or reductions to punitive damages (which are expressly denied).

**FOR A TWENTY-FOURTH DEFENSE**

59. Defendant pleads any and all other defenses which may be applicable and provided for by Rules 8 and 12 of the South Carolina Rules of Civil Procedure, by statute, by regulation, or by common law, as if set forth here verbatim.

**FOR A TWENTY-FIFTH DEFENSE**

60. Defendant reserves the right to assert any other defenses as may become apparent in discovery in this case.

**FOR A TWENTY-SIXTH DEFENSE**

61. Defendant incorporates by reference any and all defenses asserted by any other Defendants in their Answers to the Complaint and/or any subsequent Amended Answers to the Complaint.

**FOR A TWENTY-SEVENTH DEFENSE AND BY WAY COUNTERCLAIMS  
AGAINST THE PLAINTIFF:**

**FACTUAL BACKGROUND FOR COUNTERCLAIMS**

62. Defendant is a resident and citizen of Horry County, South Carolina.

63. Upon information and belief, Plaintiff is a resident and citizen of Horry County, South Carolina.

64. The following counterclaims arose out of conduct which occurred within Horry County, South Carolina.

65. The Horry County Magistrates is not the proper venue for this case, as the damages alleged herein in this counter-claim are in excess of \$7,500.00 and thus outside of the magisterial jurisdiction of this court. Defendant asserts that the Horry County Court of Common Pleas has jurisdiction over this matter and is the proper venue for this case. As such, Defendant respectfully requests that this case be removed to the Court of Common Pleas.

66. Upon information and belief, Plaintiff is a Pastor at Solid Rock Ministries Church, which is located at 803 Howard Avenue, Myrtle Beach, Horry County, South Carolina. As a Pastor, the Plaintiff holds a position of power at the church and is able to direct the action of employees and congregants of the church, as well as to direct church resources.

67. Plaintiff holds himself out as a public figure, regularly delivers sermons to his congregation from the pulpit, conducts interviews which are broadcasted nationally, and posted online on public forums, and has made statements to the public which pertain to his own private life, matters of public interest and his religious beliefs.



68. Plaintiff voluntarily announced and commented on the death of his wife to the public making a private matter a matter of public controversy and interest.

69. Plaintiff voluntarily engaged in the public controversy that he created and played a prominent role in the public controversy.

70. On or about May 5, 2024, Defendant began peacefully protesting domestic abuse by congregating with individuals with similar beliefs on a public sidewalk near 803 Howard Avenue, Myrtle Beach, Horry County, South Carolina.

71. On or about January 10, 2025, Plaintiff filed this lawsuit against Defendant, asserting allegations of wrongdoing without any factual or legal basis.

72. On or about January 14, 2025, Plaintiff filed an action for a Restraining Order against Defendant in the Horry County Magistrates Court asserting allegations of wrongdoing without any factual or legal basis.

73. Since the start of the protests in May of 2024 to present, Plaintiff, has engaged in a pattern of conduct to harass and intimidate Defendant as a means of silencing her voice and suppressing her right to free speech under the First Amendment of the United States Constitution and the South Carolina Constitution.

74. Upon information and belief, from the start of the protests in May of 2024, Plaintiff has used his position at his church and the church's resources, to direct congregants and/or agents of the church to engage in a pattern of conduct to harass, intimidate, and silence Defendant and other like-minded individuals.

**FOR A FIRST COUNTERCLAIM AGAINST THE PLAINTIFF:**  
**(Abuse of Process)**

75. Plaintiff has instituted this proceeding and other legal proceedings against the Defendant for an ulterior purpose, namely: to harass and intimidate Defendant, silence Defendant, and interfere with Defendant's rights to free association and freedom of speech.

76. The acts and conduct of the Plaintiff in instituting this proceeding and other legal proceedings are not proper.

77. Plaintiff intended to cause mental anguish to Defendant, and embarrassment to Defendant in the false allegations waged against Defendant.

78. Plaintiff's acts are willful in the use of process and not proper in the regular conduct of the proceeding.

79. As a proximate and direct result of Plaintiff's abuse of the judicial system Defendant has suffered damages in an amount greater than \$7,500.00.

80. Defendant is entitled actual and punitive damages as a result.

**FOR A SECOND COUNTERCLAIM AGAINST THE PLAINTIFF:**  
**(Intentional Infliction of Emotional Distress)**

81. Every allegation and defense above are incorporated herein by reference.

82. Defendant alleges that Plaintiff has intentionally and reckless inflicted severe emotional distress and was certain that such distress would result from Plaintiff's conduct.

83. The Plaintiff's conduct is so extreme and outrageous as to exceed all possible bounds of decency and must be regarded as atrocious, and utterly intolerable in a civilized society.

84. The actions of the Plaintiff have caused the Defendant to suffer from severe emotional distress.

85. The emotional distress suffered by the Defendant was so severe so that no reasonable person could be expected to endure it.

86. As a result of Plaintiff's conduct, the Defendant has suffered damages in an amount exceeding \$7,500.00, including without limitation, unnecessary and unreasonable stress, financial instability and stress, humiliation, and mental anguish and suffering.

**JURY TRIAL DEMAND**

87. Defendant respectfully request a jury trial as to all claims so triable in this action.

**WHEREFORE**, having fully answered Plaintiff's Complaint and asserted Counterclaims against the Plaintiff, Defendant respectfully request that:

- a) This matter be removed to the Court of Common Pleas for Horry County as damages are in excess of \$7,500.
- b) Plaintiff takes nothing by this action;
- c) a judgment of dismissal be entered in favor of Defendant;
- d) Defendant be awarded the costs of the suit incurred, including attorney's fees;
- e) Defendant be granted judgment against Plaintiff as well as costs and fees incurred in the investigation, defense, prosecution and settlement of this claim; and
- f) Defendant be awarded actual and punitive damages on Defendant's counterclaims;
- g) Defendant be awarded such other and further relief as this Honorable Court deems just and proper.

[SIGNATURE TO FOLLOW ON NEXT PAGE]

LUNASHARK MEDIA: EMPOWERING VICTIMS' VOICES THROUGH FOIA

Respectfully submitted,

COURY LAW, LLC

By: 

Philip S. Coury  
Bar Number: 104619  
pcoury@coury-law.com  
2127 Park Street  
Columbia, SC 29201  
803.293.5189 (voice)

ATTORNEY FOR DEFENDANT  
ALEXANDRA CUOZZO

February 11, 2025  
Columbia, South Carolina

COURTESY OF LUNASHARK MEDIA

Certificate of Service

The undersigned counsel for the Defendant hereby certifies that on the 11<sup>th</sup> day of February 2025, he served a copy of the foregoing document upon the Plaintiff by U.S. Mail to his address at 4869 Hwy 17 Bypass S, Myrtle Beach, SC 29577 and via email to



COURY LAW, LLC

By:



Philip S. Coury  
Bar Number: 104619  
pcoury@coury-law.com  
2127 Park Street  
Columbia, SC 29201  
803.293.5189 (voice)

Attorney for Defendant

LUNASHARK MEDIA: EMPOWERING  
VICTIMS' VOICES THROUGH FOIA

COURTESY OF AN ANONYMOUS FOIA  
LUNASHARK MEDIA

LUNASHARK MEDIA: EMPOWERING VICTIMS' VOICES THROUGH FOIA

STATE OF SOUTH CAROLINA )  
 )  
COUNTY OF HORRY )  
 )  
John Paul Miller, )  
 )  
Plaintiff, )  
 )  
vs. )  
 )  
Alexandra Cuzzo )  
 )  
Defendant. )  
 )  
\_\_\_\_\_ )

IN THE MAGISTRATE'S COURT  
FIFTHTEENTH JUDICIAL CIRCUIT  
Civil Case Number: 2025CV261090096

**MOTION FOR REMOVAL**

COMES NOW the Defendant Alexandra Cuzzo ("Defendant"), by and through undersigned counsel, and moves this Honorable Court to remove this action to the Circuit Court pursuant to S.C. Code Ann. § 22-3-30. The grounds for this motion are as follows:

1. This action was commenced in Magistrate Court on January 10, 2025.
2. Defendant timely filed an Answer with Counterclaims on February 10, 2025.
3. Defendant's Counterclaims seek damages in excess of \$7,500.00, which exceeds this Court's jurisdictional limit of \$7,500.00 as set forth in S.C. Code Ann. § 22-3-10.
4. Pursuant to S.C. Code Ann. § 22-3-30, when a counterclaim exceeds the civil jurisdictional amount of the magistrate's court, the entire case must be transferred to the circuit court.
5. The Court of Common Pleas for Horry County has proper jurisdiction over this matter pursuant to S.C. Code Ann. § 14-5-350.

**WHEREFORE**, Defendant respectfully requests that this Court:

- a) Remove this action to the Court of Common Pleas for Horry County;
- b) Direct the Clerk to transfer all pleadings and documents to the Horry County Court of Common Pleas; and
- c) Grant such other relief as this Court deems just and proper.

[SIGNATURE TO FOLLOW ON NEXT PAGE]



LUNASHARK MEDIA: EMPOWERING  
VICTIMS' VOICES THROUGH FOIA

Respectfully submitted,

COURY LAW, LLC

By:



Philip S. Coury  
Bar Number: 104619  
pcoury@coury-law.com  
2127 Park Street  
Columbia, SC 29201  
803.293.5189 (voice)

Attorney for Defendant

February 11, 2025  
Columbia, South Carolina

COURTESY OF  
LUNASHARK MEDIA

Certificate of Service

The undersigned counsel for the Defendant hereby certifies that on the 11<sup>th</sup> day of February 2025, he served a copy of the foregoing document upon the Plaintiff by U.S. Mail to his address at 4869 Hwy 17 Bypass S, Myrtle Beach, SC 29577 and via email to



COURY LAW, LLC

By: 

Philip S. Coury  
Bar Number: 104619  
pcoury@coury-law.com  
2127 Park Street  
Columbia, SC 29201  
803.293.5189 (voice)

Attorney for Defendant

COURTESY OF ANONYMOUS FOIA  
LUNASHARK MEDIA

LUNASHARK MEDIA: EMPOWERING  
VICTIMS' VOICES THROUGH FOIA

**COURY LAW, LLC**

Philip S. Coury, Esquire  
2127 Park Street  
Columbia SC, 29201  
pcoury@Coury-Law.com  
803.293.5189

February 11, 2025

**VIA US MAIL AND FACISMILE:**

Clerk of Court  
Myrtle Beach Magistrate Court  
1201 21<sup>st</sup> Avenue North  
Myrtle Beach, SC 29577  
843.444.6131

Re: My Client: Alexandra Cuozzo  
Civil Action Number: 2025CV261090096  
Case Name: *John Paul Miller v. Alexandra Cuozzo*

**Letter of Representation:**

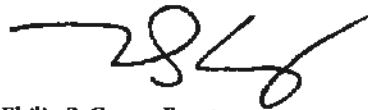
Honorable Clerk of Court,

Please be advised that I have been retained to represent Alexandra Cuozzo, in relation to the above-referenced lawsuit. Please direct all further correspondence directly to me.

Please find enclosed with this letter for filing: my Notice of Appearance, Defendant's Answer and Counterclaims, and Defendant's Motion to Remove, for filing.

Should you have any questions, please do not hesitate to contact me via email at [pcoury@coury-law.com](mailto:pcoury@coury-law.com) or by phone at 803-293-5189.

Very Truly Yours,



Philip S. Coury, Esquire

PSC  
Enclosure

MYRTLE BEACH  
MAGISTRATE'S OFFICE  
2025 FEB 11 AM 11:20  
DISTRICT #6  
2025 MAR 26 P 14:33  
FILED  
HORRY COUNTY  
RENEE N. ELVIS  
CLERK OF COURT  
HORRY COUNTY, SC

LUNASHARK MEDIA: EMPOWERING VICTIMS' VOICES THROUGH FOIA

OF AN ANONYMOUS FOIA  
AROUND AND FIND OUT SPONSOR

LUNASHARK MEDIA: EMPOWERING VICTIMS' VOICES THROUGH FOIA

STATE OF SOUTH CAROLINA )  
 )  
COUNTY OF HORRY )  
 )  
John Paul Miller, )  
 ) Plaintiff, )  
 )  
vs. )  
 )  
Alexandra Cuozzo )  
 ) Defendant. )

IN THE MAGISTRATE'S COURT  
FIFTHTEENTH JUDICIAL CIRCUIT  
Civil Case Number: 2025CV261090096

**NOTICE OF APPEARANCE**

Now comes the undersigned counsel and hereby enters his appearance as legal counsel for the Defendant with respect to all matters and proceedings in this case henceforth.

2025 FEB 11 9 AM 11:20  
MYRTLE BEACH  
MAGISTRATE'S OFFICE  
DISTRICT #6

Respectfully submitted,

COURY LAW, LLC

By:



Philip S. Coury  
Bar Number: 104619  
pcoury@coury-law.com  
2127 Park Street  
Columbia, SC 29201  
803.293.5189 (voice)

Attorney for Defendant

February 11, 2025  
Columbia, South Carolina

FILED  
HORRY COUNTY  
2025 MAR 26 P 4:33  
RENEE N. ELVIS  
CLERK OF COURT  
HORRY COUNTY, SC

Certificate of Service

The undersigned counsel for the Defendant hereby certifies that on the 11<sup>th</sup> day of February 2025, he served a copy of the foregoing document upon the Plaintiff by U.S. Mail to his address at 4869 Hwy 17 Bypass S, Myrtle Beach, SC 29577 and via email to



COURY LAW, LLC

By:

A handwritten signature in black ink, appearing to read 'P. Coury', written over a horizontal line.

Philip S. Coury  
Bar Number: 104619  
pcoury@coury-law.com  
2127 Park Street  
Columbia, SC 29201  
803.293.5189 (voice)

Attorney for Defendant

LUNASHARK MEDIA: EMPOWERING VICTIMS' VOICES THROUGH FOIA

COURTESY OF ANONYMOUS FOIA REQUESTOR LUNASHARK MEDIA

**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 [REDACTED] Cuozzo**

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

MYRTLE BEACH  
MAGISTRATES OFFICE

2025 JAN 27 PM 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.



**Anthony Marlowe**  
Process Server

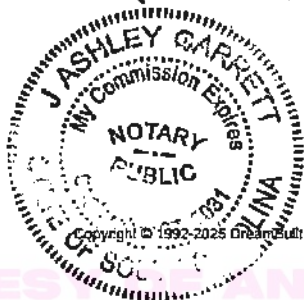
**VPS Solutions, LLC**  
1318 N Main St #1445  
Summerville, SC 29483  
(843) 817-3886

Our Job Serial Number: VPI2025000115

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



NOTARY PUBLIC



FILED  
HORRY COUNTY  
2025 MAR 26 P 4:33  
FINNEE N. ELMIS  
CLERK OF COURT  
HORRY COUNTY, SC

COURTESY OF AN ANONYMOUS DONOR  
AROUND AND FIND OUT SPONSOR

LUNASHARK MEDIA: EMPOWERING  
VICTIMS' VOICES THROUGH FOIA



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 [REDACTED] Cuozzo

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

COURTESY OF AN ANONYMOUS FOIA  
AROUND AND FIND OUT SPONSOR

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

DEFENDANT (THEM)

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

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

COURTESY OF AN ANONYMOUS FOIA  
AROUND AND FIND OUT SPONSOR

LUNASHARK MEDIA: EMPOWERING  
VICTIMS' VOICES THROUGH FOIA

2025CV01050U96

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 ████████████████████ 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 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.

COURTESY OF AN ANONYMOUS FOIA  
AROUND AND FIND OUT SPONSOR

LUNASHARK MEDIA: EMPOWERING  
VICTIMS' VOICES THROUGH FOIA

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.

COURTESY OF AN ANONYMOUS FOIA  
AROUND AND FIND OUT SPONSOR

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.

COURTESY OF AN ANONYMOUS FOIA  
AROUND AND FIND OUT SPONSOR



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.

LUNASHARK MEDIA: EMPOWERING  
VICTIMS' VOICES THROUGH FOIA

COURTESY OF AN ANONYMOUS FOIA  
AROUND AND FIND OUT SPONSOR

LUNASHARK MEDIA: EMPOWERING VICTIMS' VOICES THROUGH FOIA

202501861090096

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	<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 10-13-2020. )

*[Signature]*  
\_\_\_\_\_  
PLAINTIFF (or his attorney)

