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SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM YORK COUNTY
In the Court of Common Pleas 16th Circuit

Judge G.D. Morgan Jr. (Greenville/Pickens)

Appellate Case No. 2026-000366

Johnny E. Miller

Appellant

v.

Jacqueline Miller

Respondent

RECORD ON APPEAL

Johnny E. Miller
1829 Paces River Ave.
Apt. #106
Rock Hill, SC 29732
(803) 517-0378
Appellant_Pro Se

Jacqueline B. Miller
616 Melville Dr.
Rock Hill, SC 29732
(803) 417-2542
Respondent_Pro Se

Jul 20 2026

SC Court of Appeals

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STATE OF SOUTH CAROLINA
COUNTY OF York
IN THE COURT OF COMMON PLEAS

FORM 4

JUDGMENT IN A CIVIL CASE

CASE NO. 2025CP4604122

Johnny E Miller
PLAINTIFF(S)

Jacqueline Miller
DEFENDANT(S)

DISPOSITION TYPE (CHECK ONE)

- ☐ **JURY VERDICT.** This action came before the court for a trial by jury. The issues have been tried and a verdict rendered.
- ☒ **DECISION BY THE COURT.** This action came to trial or hearing before the court. The issues have been tried or heard and a decision rendered.
- ☐ **ACTION DISMISSED (CHECK REASON):** ☐ Rule 12(b), SCRCP; ☐ Rule 41(a), SCRCP (Vol. Nonsuit); ☐ Rule 43(k), SCRCP (Settled); ☐ Other
- ☐ **ACTION STRICKEN (CHECK REASON):** ☐ Rule 40(j), SCRCP; ☐ Bankruptcy; ☐ Binding arbitration, subject to right to restore to confirm, vacate or modify arbitration award; ☐ Other
- ☐ **STAYED DUE TO BANKRUPTCY**
- ☐ **DISPOSITION OF APPEAL TO THE CIRCUIT COURT (CHECK APPLICABLE BOX):**
☐ Affirmed; ☐ Reversed; ☐ Remanded; ☐ Other

NOTE: ATTORNEYS ARE RESPONSIBLE FOR NOTIFYING LOWER COURT, TRIBUNAL, OR ADMINISTRATIVE AGENCY OF THE CIRCUIT COURT RULING IN THIS APPEAL.

IT IS ORDERED AND ADJUDGED: ☐ See attached order (formal order to follow) ☒ Statement of Judgment by the Court:

See page 2

ORDER INFORMATION

This order ☒ ends ☐ does not end the case

☒ See Page 2 for additional information.

For Clerk of Court Office Use Only

This judgment was electronically entered by the Clerk of Court as reflected on the Electronic Time Stamp, and a copy mailed first class to any party not proceeding in the Electronic Filing System on 12/18/2025

Jacqueline Miller for Jacqueline Miller
Johnny E Miller for Johnny E Miller
Jacqueline Miller for Jacqueline Miller
Johnny E Miller for Johnny E Miller

Mar 02 2026

NAMES OF TRADITIONAL FILERS SERVED BY MAIL

2

Court Reporter:

E-Filing Note: The date of Entry of Judgment is the same date as reflected on the Electronic File Stamp and the clerk's entering of the date of judgment above is not required in those counties. The clerk will mail a copy of the judgment to parties who are not E-Filers or who are appearing pro se. See Rule 77(d), SCRCP.

This matter is before the Court on Appeal from the Magistrate Court. Based on a review of the file, pleadings, submissions of the parties, and oral argument, the Court finds no error of law or fact. The order of the Magistrate is AFFIRMED.

In an appeal from the Magistrate Court, the appellate court may affirm or reverse the judgment of the Magistrate, in whole or in part, as to any or all of the parties and for errors of law or fact. *Bowers v. Thomas*, 373 S.C. 240, 644 S.E.2d 751 (Ct. App. 2007). Appellant bases his appeal on the allegation that the findings in the Return of the Magistrate were not based on the record. The appellate court must only consider the statutorily required papers from the magistrate. These papers include the magistrate's Return which is particularly necessary when there is no transcript available. See S.C. Code Ann. Section 22-3-730. The Court finds Appellant did not present any evidence that the lower court erred in reaching its decision. This Court is restricted to the Magistrate Court's Return and the Court finds no errors committed below. Therefore, the Magistrate Court's decision is affirmed.

It Is So Ordered.

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York Common Pleas

Case Caption: Johnny E. Miller VS Jacqueline Miller
Case Number: 2025CP4604122
Type: Order/Electronic Form 4

So Ordered

G.D. Morgan Jr.

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STATE OF SOUTH CAROLINA
COUNTY OF York
IN THE COURT OF COMMON PLEAS

FORM 4

JUDGMENT IN A CIVIL CASE

CASE NO. 2025CP4604122

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PLAINTIFF(S)

Jacqueline Miller
DEFENDANT(S)

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☐ Other
- ☐ **ACTION STRICKEN (CHECK REASON):** ☐ Rule 40(j), SCRCP; ☐ Bankruptcy;
☐ Binding arbitration, subject to right to restore to confirm, vacate or modify arbitration award;
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- ☐ **STAYED DUE TO BANKRUPTCY**
- ☐ **DISPOSITION OF APPEAL TO THE CIRCUIT COURT (CHECK APPLICABLE BOX):**
☐ Affirmed; ☐ Reversed; ☐ Remanded;
☐ Other

NOTE: ATTORNEYS ARE RESPONSIBLE FOR NOTIFYING LOWER COURT, TRIBUNAL, OR ADMINISTRATIVE AGENCY OF THE CIRCUIT COURT RULING IN THIS APPEAL

IT IS ORDERED AND ADJUDGED: ☐ See attached order (formal order to follow) ☒ Statement of Judgment by the Court:

This matter is before the Court on Appellant's Motion to Reconsider. Based on a careful and thorough review of the file and the Motion, the Court finds no basis to amend or alter the previous Order and therefore respectfully denies the Motion. The Court further finds that no hearing is necessary to render a decision on this matter pursuant to Rule 59(f) SCRCP.

It Is So Ordered.

ORDER INFORMATION

This order ☒ ends ☐ does not end the case.

☐ See Page 2 for additional information.

For Clerk of Court Office Use Only

This judgment was electronically entered by the Clerk of Court as reflected on the Electronic Time Stamp, and a copy mailed first class to any party not proceeding in the Electronic Filing System on 02/12/2026.

Jacqueline Miller for Jacqueline Miller
Johnny E Miller for Johnny E Miller
Jacqueline Miller for Jacqueline Miller
Johnny E Miller for Johnny E Miller

NAMES OF TRADITIONAL FILERS SERVED BY MAIL

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York Common Pleas

Case Caption: Johnny E Miller VS Jacqueline Miller
Case Number: 2025CP4604122
Type: Order/Electronic Form 4

So Ordered

G.D. Morgan Jr.

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STATE OF SOUTH CAROLINA

-----x

JOHNNY E. MILLER,

Plaintiff,

Case No.

-against-

2025-CP-46-4122

JACQUELINE MILLER,

Defendant.

-----x

December 17, 2025

York, S.C.

B E F O R E:

HONORABLE G.D. MORGAN

A P P E A R A N C E S:

Johnny e. Miller, Pro se

Jacqueline Miller, Pro se

Aileen Butler

Official Court Reporter

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THE COURT: The next matter Miller versus
Miller, 2022-CP-41-22.

All right, please identify yourself for the
record starting with the plaintiff Mr. Miller.

MR. MILLER: John Miller, Your Honor.

THE COURT: All right.

MS. MILLER: I'm Jacqueline Miller.

THE COURT: Okay. So this is an appeal I
believe Mr. Miller you had brought.

MR. MILLER: Yes, sir.

THE COURT: You are the appellant and you
have appealed the matter.

MR. MILLER: Yes, sir.

THE COURT: Okay, I will hear from you.

MR. MILLER: Well, a restraining order was
issued by the Magistrate Court by the Honorable
Judge Colton and I have been found not guilty on
a harassment charge. For that same arresting
charge a restraining order had previously been
sought in an exact same court, the magistrate
court but it was Judge Cousins. At that time
Judge Cousins denied the restraining order for
the harassment charge. The harassment charge
was nol pros for 18 months with the right to
restore the charges and the charges were

1 restored after about a year -- after about 14-15
2 months and when the the charges were restored
3 the no contact order was restored and therefore
4 the respondent, my ex-wife, reapplied for a
5 restraining order and it was granted. But the
6 restraining order was granted on just a totally
7 bogus basis.

8 The initial hearing that we had before Judge
9 Colton the recording was not -- she said there
10 was technical difficulty and the recording was
11 not made and when I filed for the appeal I guess
12 the appellant court sent it back before Judge
13 Colton again and Judge Colton still refused to
14 withdraw the restraining order.

15 She filed a return, Your Honor, and the
16 return was just one hundred percent just totally
17 false.

18 I filed an answer to the return. I have all
19 the documents here for the Court. For the
20 record I will enter the return -- I mean the
21 answer, appellant's answer to the return which I
22 filed on November --

23 THE COURT: All your pleadings have been
24 filed. They're filed with the Court.

25 MR. MILLER: Yes, sir. And Your Honor, it's

10

4

1 just a bad situation for everybody. I was born
2 and raised here in Rock Hill. My ex-wife was
3 born here and raised in Rock Hill. She works
4 for the police department. I know many of the
5 people who work for the police department. I
6 know the powers to be here and the -- I'm a one
7 hundred percent innocent person. We were
8 married for 42 years and we went through a
9 bitter divorce and it's my belief that my
10 ex-wife used the leverage working at the police
11 department to just make up a bunch of lies
12 against me. I was found not guilty by a jury
13 trial on the harassment charges.

14 Your Honor, I spent 40 days in jail. I'm a
15 christian minister right here in town. I was a
16 public school teacher. I got fired from my job
17 because of the harassment charge. I'm an
18 honorable discharged veteran. I have a master's
19 degree from Duke University. Undergraduate
20 degree from Winthrop University. Never been
21 arrested in my life except for one time about
22 thirty, thirty-five years ago I was in
23 Washington D.C. and I had a handgun in my car
24 and I did not know it's zero tolerance for
25 handguns In Washington D.C. I was up there to

11

1 visit my sister in New Years and I was arrested
2 and they took my gun. I legally owned a gun
3 here in South Carolina and that's the only
4 arrest I ever had before all of this.

5 I'm just completely innocent. I've never
6 done anything. I've never harassed my ex-wife
7 wife in my entire life ever. It all started, I
8 allege, and I still believe and I have strong
9 circumstantial evidence that she had an affair
10 with the city manager with Rock Hill. I filed
11 all this in paperwork, Your Honor. After I
12 filed -- this was during the divorce. I asked
13 for a divorce on the grounds of adultery, but
14 they did not grant it and there is an appeal
15 pending on that right now. And then shortly
16 after that I went out of town unexpectedly
17 because a friend, a fellow minister in Kentucky,
18 his wife passed. My ex-wife and I both were
19 friends with them. She had cancer. They knew
20 she was going to pass, but she passed sort of
21 unexpectedly. They knew she was going to pass
22 but of course they didn't know, but they had all
23 the funeral arrangements and everything done.
24 He called me. He said, John, I'd like for you
25 to be there. So I left immediately. I didn't

12

6

1 tell anyone. I left to go to Kentucky. To the
2 funeral in Kentucky and I got there about three
3 or four o'clock in the morning and I laid down
4 to go to sleep. Wake up and go to the funeral
5 the next day. About an hour later I got a buzz
6 from my camera, door camera, at my apartment and
7 there was a young white female lady knocking on
8 my door and I thought I was dreaming, but she
9 stayed there for 15 minutes. And then right
10 after that about five minutes later a police
11 officer walked passed right where she was
12 standing and went around to the back of my
13 apartment. I got all this on camera. So I
14 called the Rock Hill Police Department and told
15 them about this. Told them that I was going
16 through a nasty divorce with my ex-wife and
17 everything and I said, I thought she had a
18 part. She had something to do with this. No
19 one knew I was going out of town and I always
20 got up, Your Honor, at five o'clock in the
21 morning and went to the gym. She knows my
22 schedule like clockwork. And that girl was at
23 my door right at five o'clock. About 15 minutes
24 before five.

25 So I called the Rock Hill Police Department

1 and they said they had no report. No telephone
2 call of anything about a police officer being at
3 that -- at that residence or anything like that.
4 And I said I got the police officer on camera.
5 They said we do not. So when I got back I
6 talked to Chief Watts about it. Chief Watts
7 said we have absolutely no report of that. So I
8 filed a complaint. When I filed the complaint
9 they said we did find where you made a telephone
10 call about the young lady and so on and so forth
11 and then shortly after that, Your Honor, I was
12 arrested on harassment charges for absolutely
13 nothing.

14 I mean it's just a terrible situation. I
15 have not done anything and I've been going
16 through this forever. I lost my house behind
17 it.

18 We were in court and I got pre-approved to
19 buy the home and the judge gave her first
20 choice, which I don't know why, but he gave her
21 first choice to buy the house. He said in court
22 -- it was Judge White -- he said if she doesn't
23 buy the house you can buy the house. She didn't
24 buy the house for whatever reason. Then they
25 still wouldn't let me buy it. They sold it and

1 I had already got pre-approved.

2 They wouldn't let me present any evidence
3 whatsoever. Any of my witness testified about
4 the evidence that I had they wouldn't let me
5 show the evidence in court. So I believe, you
6 know, because she works for the police
7 department, the City of Rock Hill, conspired to
8 entrap me. I was found again not guilty.

9 None of the -- the statements that Judge
10 Colton wrote in her return are true that she
11 based giving the restraining order, and again,
12 Judge Cousins denied the respondent a
13 restraining order almost for the exact same
14 reasons. So that's pretty much it.

15 THE COURT: All right. Miss Miller, I'll
16 hear from you.

17 MS. MILLER: Thank you, Your Honor. Good
18 morning.

19 THE COURT: Good morning.

20 MS. MILLER: It's a lot. First of all, Your
21 Honor, I would like to say the fact that I'm
22 here I believe that this is just a continuation
23 of harassment that I've been receiving from Mr.
24 Miller for the last several years.

25 As he stated, yes, we were divorced in

November of 2022. I would like to go on record to say that Mr. Miller was arrested five times in Kentucky. Five times in Kentucky prior to us being divorced. That should be in the record. Five times. Had nothing to do with me. But it was his trespassing at a church event. Had absolutely nothing to do with me. He said he had never been arrested.

He said that the divorce, yes, he tried to say that I committed adultery, but the reason why he didn't get it based on grounds because he had absolutely zero evidence. He has never submitted any evidence. His own three daughters had asked him for evidence. He has never shown them any evidence. His church members have asked him for evidence. He has never showed them any evidence. And the reason why is because he doesn't have any evidence. I want to go on record for that.

Also, Mr. Miller he says that in 18 months that he had the nol pros there was a no contact order in place. That is not true. The no contact order was in place the entire 18 months. Between Mr. Miller being arrested in April of 2023 up until now there has been either a no

1 contact order in place, or a restraining order
2 in place on Mr. Miller. The entire time. He
3 has never been without any type of no contact or
4 restraining order. I believe there is paperwork
5 clearly that I have, he has, and the court has
6 to show that. I came to the court myself,
7 before the courts, and asked for a restraining
8 order because when I divorced Mr. Miller in
9 November -- or Mr. Miller divorced me to make it
10 clear. He divorced me, which is wild why I
11 still here with him. He divorce me in November
12 of 2022. In April of 2023 I filed a harassment
13 charge against Mr. Miller because he was
14 harassing me through sending me emails after I
15 had asked him not to. He continued 27 emails
16 later calling me names. Putting me down.
17 Accusing me of things. Twenty-seven emails
18 later I filed a harassment charge against him
19 and he was arrested. At the time he was given a
20 no contact order at that time. I did go a
21 little later and ask for a restraining order.
22 They did not give me one at the time. I did not
23 have near, near evidence that I have currently
24 or that I had in July of 2025 to show the
25 magistrate of why I needed a restraining order

1 from Mr. Miller.

2 Mr. Miller divorced me in November of 2022
3 and he has harassed the hell out of me ever
4 since. He has harassed me through my job. He
5 has sent emails on my job. Yes, sir, he lost
6 his job, but I have never contacted his job. I
7 have never sent one thing to his job. I have
8 never called his job, not one time. He accused
9 me of it, but he doesn't have any proof. So I
10 have emails, after emails, after emails where he
11 has contacted my job.

12 I have him on surveillance camera where he
13 has come to my job. So that's what brought me
14 to whole restraining order. June of 2025 Mr.
15 Miller decides he's going to come to my job and
16 file a police report. False police report. He
17 files this false police report and he states on
18 June the 4th of 2025, I'm informed by my
19 superiors that Mr. Miller comes here and he
20 files a police report and in essence there's a
21 bunch of rambling goes on, but two things
22 preliminary stands out to them. One, he says
23 that I was harassing him because he wanted to go
24 to a gospel assembly campground meeting that I
25 told them basically not to allow him to come and

1 he had received a letter telling him that he
2 couldn't come.

3 In 2022, I believe it was, May or June, Mr.
4 Miller was arrested five times where he couldn't
5 go to that meeting. Had nothing to do with me
6 and basically all he was doing was every year
7 getting a, you can't come to the gospel assembly
8 campground, which had nothing to do with me. I
9 have those letters right here, Your Honor, and
10 he came up to my job and filed a complaint
11 saying that I was harassing him because he got a
12 letter stating that he couldn't come this year.
13 Then he went on to say that I was harassing him
14 because I went to our niece. Now, this is his
15 brother's daughter who graduated from college
16 who invited me to her graduation and afterwards
17 to the dinner that they had. She invited me to
18 this. We went to the dinner. He also put in
19 this false police report that I sat there and
20 tried to basically get him I guess in some kind
21 of way to say something to me because this no
22 contact order was in place so that he could
23 respond and get arrested. Another bunch of
24 foolishness, and his own daughter wrote an
25 affidavit stating that was a lie. I never

1 opened my mouth about Mr. Miller to him or
2 anything. Just conversation. He sat over there
3 and doing all that foolishness that he was
4 doing. But he filed this false police report.
5 So at that point, Your Honor, enough was enough.
6 I went over to the magistrate's office and I
7 filed a police report -- I mean, a restraining
8 order -- for a restraining order because no one
9 should have to be in a position where they're
10 trying to make a living and they are trying to
11 work. We had had gone from a two house income
12 to a one income. I'm trying to work. Make a
13 living for myself and this man is coming on my
14 job.

15 He's harassing me by coming and filing false
16 police reports. Showing up trying to make them
17 allow him to talk to individuals about stuff
18 that had nothing to do with anything. Just a
19 bunch of lies. So I went up there and I filed
20 this. Filed for a restraining order. Of course
21 when I went in there I showed them. I didn't
22 come in to just talk. I had evidence, Your
23 Honor, and they granted me a retraining order.
24 The restraining order was granted on July 24th
25 of 2025.

20

1 I'm going to start there. July 24th of 2025
2 Mr. Miller has yet to stop harassing me -- I'm
3 sorry. Knowing he has a restraining order. He
4 understands. He's very smart. The man went to
5 Duke University. He tells everybody that.

6 In October of 2025 Mr. Miller who believes
7 that the police department is corrupt and they
8 are taking my side on all of this stuff that's
9 going on. They're in cahoots with me with this
10 little young white girl who came to his
11 apartment over in the morning with a police
12 officer that I was behind. Why would I do this
13 I don't know, but this is what he thinks. He's
14 delusional in his mindset. The chief of police
15 is corrupt. The police chief was having a
16 prayer breakfast. Mr. Miller thought that it
17 was a great idea to call in and RSVP to come.
18 Why in the world would Mr. Miller want to come
19 to the chief's prayer breakfast when you think
20 that he is corrupt and all of his people that
21 work with him. But no, he calls in. He RSVP's.
22 The chief responds and tells him, no, you can
23 not come. Miss Miller works for the Rock Hill
24 Police Department and you have a restraining
25 order. She will be on duty so you are not able

1 to come. He goes back and forth. I see the
2 e-mails where he says I'm coming anyway
3 basically because the citizens of Rock Hill are
4 paying for this. Tax payers. You're not paying
5 for it. I'm a tax payer. I can come. But
6 somewhere in there one of those people talked to
7 him and told him not to come so he didn't show
8 up.

9 That was on the 10th, that Friday. The next
10 day which was a continuation, the 11th.
11 Everybody is working. Everybody is having a
12 nice peaceful time. Who shows up? Mr. Miller.
13 To something that has to do with Rock Hill
14 Police Department.

15 Now, I was married to Mr. Miller for over 40
16 years and he rarely showed up for things that
17 had to do with the police department, but he
18 decided he will show up to this event. After he
19 shows up he's escorted off the the grounds. Yet
20 more embarrassment for myself, humiliation and
21 harassment. He escorted off the grounds by the
22 deputy chief and two other officers. He's told
23 at that time do not come back to any event that
24 is held by the police department or you will be
25 arrested. An internal report was made which I

22

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1 have and I've also submitted to the court. This
2 was in October while Mr. Miller had a
3 restraining order.

4 Then in November he don't stop. Mr. Miller
5 decides -- and this goes on all the time --
6 fifty or more ministers out here. Now, he
7 didn't send it to me, but 50 or more ministers
8 out here, he decides he is going to take him a
9 public platform, mass communication platform,
10 religious platform and send out emails to them
11 or text messages and let them know that he's a
12 man jealous and enraged, calling me a whore and
13 an adulterous woman. Although it was indirect,
14 Mr. Miller is basically using mass communication
15 in a religious platform to continue to harass
16 me. As he states, God has called him to kill
17 Jezebel just like they did in the Bible. Still
18 harassing me.

19 These were very disturbing and threatening
20 as far as I'm concerned and several other
21 ministers said that to me because they were
22 concerned about Mr. Miller's behavior.

23 He doesn't stop there, Your Honor. In the
24 last two weeks, my granddaughter who cheers for
25 Dutchman Creek. He's a grandfather. I'm

1 grandmother. We both should have the right to
2 go to the games and enjoy our grandchildren. I
3 have a tendency when I show up I scan the room.
4 Mr. Miller is sitting there, I'm going to go
5 over there. I don't care if he's sitting with
6 my daughter, my grandchildren. I don't care who
7 he's sitting with. I go over there if I'm
8 sitting by myself. Not Mr. Miller, Your Honor.
9 Not Mr. Miller. If he come in the room and I'm
10 sitting here and my daughter is sitting here and
11 my grandchildren are sitting here, he thinks he
12 has the right to pull up a chair and sit here
13 too. Well, I beg to differ, because I have a
14 restraining order and he doesn't have that
15 right.

16 On October the 10th -- I'm sorry. On
17 December the 9th, which is just last week, my
18 daughter, son-in-law and grandbaby walk into the
19 gym. I'm already there. I've already scanned
20 the room. I'm over here. Mr. Miller is over
21 there. My daughter, they walked in. My
22 daughter know what the deal is. So they walk
23 over to him. They embrace him and they proceed
24 to walk over here to sit with me. One might
25 say, why didn't they sit with him, because he's

1 toxic and they don't want to be around him
2 because he's an embarrassment to be honest. So
3 they walk over there with me. So what does he
4 do, he stands up and follows them over to where
5 I'm sitting. My daughter turns around and says,
6 dad, where are you going? I'm going to sit with
7 my family. So he comes over there and sits over
8 there where I'm sitting.

9 On December the 11th. I come in early. I'm
10 sitting over there. My daughter and family
11 comes in. They're sitting with me. About hour
12 later, here comes Mr. Miller. He looks around.
13 He spots us. What does he do? He comes in. He
14 comes over there. He plops down right there
15 with us.

16 Just Monday, December the 15th. We're all
17 sitting there; my daughter, my granddaughter,
18 me, and my son-in-law. Here comes Mr. Miller.
19 He walks in. He steps up. Gives my son-in-law
20 a hug, Your Honor. He steps down and he sits
21 right there beside me. Just one space and
22 there's me. So there is no restraining order.

23 Mr. Miller thinks that he's above the law.
24 He doesn't care about this restraining order,
25 Your Honor. He doesn't care about the judge's

1 appeal. He doesn't care about anything. The
2 only thing he's concern about in this courtroom
3 today is control. He wants control to have
4 access to me so he can continue to harass me and
5 to treat me the way that he wants to be treated.
6 He's only upset because the only thing that's
7 standing between Mr. Miller and his ex-wife is
8 this restraining order and I beg you -- because
9 he's a dangerous man. Don't let him have access
10 to me.

11 THE COURT: Thank you, ma'am. All right,
12 just brief reply. Is there any reply? All I
13 want to do is hear if there's anything about the
14 hearing itself. The evidence of the hearing
15 itself. I don't want to hear anything else
16 other than that.

17 MR. MILLER: Your Honor, you know I'm going
18 to obey you. I was jotting down all the things
19 that she said that was not true. Do you not
20 want me --

21 THE COURT: I would assume that you will
22 argue that none of that is true. The issue
23 really before the Court is, was there evidence
24 in the record at the time in July when Judge
25 Colton issued the order.

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1 What is your grounds of appeal? It looks
2 like you produce witnesses. You testified. How
3 did the lower court -- how did the judge err?

4 MR. MILLER: The judge erred -- did you --
5 did you see my return?

6 THE COURT: I've seen who testified. Saw
7 what the testimony was there in the return. How
8 did the judge erred?

9 MR. MILLER: The judge erred by totally
10 ignoring evidence. In other words she ignored
11 -- the return was a fictitious narrative.
12 That's what I put in the return. None of it was
13 true. The two witnesses that testified I have
14 them here today to testify again.

15 THE COURT: Well, this is an appeal. There
16 is no testimony today.

17 MR. MILLER: Okay. Well, she erred in that
18 she ignored -- I mean, it's basically like a
19 judge -- well, I put in the judge -- I mean in
20 my answer to the return, Your Honor, that her
21 decision was immoral. Was irrational.

22 THE COURT: How was it immoral?

23 MR. MILLER: Well, I mean as a judge you
24 take -- you take an oath I'm sure to be
25 truthful.

1 THE COURT: Well, she heard the witnesses
2 and the judge then determines the testimony and
3 the judge in this particular case believed Miss
4 Miller and did not believe you. So the judge is
5 entitled to do that.

6 The judge determined -- I saw the judge's
7 return. The credibility, the judge takes in the
8 credibility of the witnesses. The judge found
9 that Miss Miller was credible and believed her
10 testimony. So the judge is entitled to do that.

11 The judge viewed the testimony of both of
12 you and any witnesses or other documents you
13 tried to introduce into evidence.

14 MR. MILLER: Yes, sir. Your Honor, I
15 understand that. In other words, if you have a
16 judge that's immoral. I'm mean you -- I'm mean
17 I'm not trying --

18 THE COURT: I would take exception to
19 calling a judge immoral. I don't see anything
20 in the record and I've reviewed the record. I
21 don't see anything immoral that the judge did.
22 The judge heard the evidence. The judge
23 determined the credibility and the judge made
24 that ruling.

25 Mr. Miller: Your Honor, I put that in the

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1 answer to the return. I said, I apologize for
2 having to call the judge immoral, because I know
3 --

4 THE COURT: I will say for the record I do
5 not see any evidence that the judge acted
6 immoral. I don't see anything that the judge
7 acted immoral.

8 MR. MILLER: Your Honor, the only way you
9 would see you would have to be here. In other
10 words, you would have to hear the testimony.

11 THE COURT: The judge did. The judge heard
12 the testimony and the judge issued the order
13 based on the testimony the judge heard.

14 MR. MILLER: The record -- you know there
15 was no transcript or no recording of that, what
16 the judge heard. She said that it was a
17 technical difficulty.

18 Now, I believe that the judge intentionally
19 did not make a recording of that hearing.

20 THE COURT: And what evidence do you have of
21 that?

22 MR. MILLER: Because everything that she
23 said --

24 THE COURT: You're accusing the judge of
25 intentionally doing something?

1 MR. MILLER: Your Honor, that's exactly what
2 I'm doing.

3 THE COURT: What evidence do you have that
4 the judge intentionally did that?

5 MR. MILLER: In other words, here's the
6 evidence. If everything that you write that was
7 said in the hearing is totally false, and a
8 recording that is usually made we just don't
9 have it because of a technical difficulty. And
10 then everything that was said in that hearing
11 that there is no recording because of a
12 technical difficulty, everything is false.

13 THE COURT: How does that -- when you have a
14 technical difficulty, how does that
15 automatically mean that's something is false and
16 a judge is immoral? I want you to prove other
17 than there was a technical difficulty.

18 MR. MILLER: Whenever you have people in
19 authority that's the thing. In other words, the
20 lawyers who I've talked, they said, John, you
21 know how this is.

22 THE COURT: I don't want to hear what you
23 talked to with any lawyers. I want to hear only
24 on the evidence, the arguments you have for that
25 hearing.

1 MR. MILLER: Your Honor, what I'm saying is
2 that there is no way -- in other words, when a
3 person is like -- you're the judge. Whatever
4 the judge says that's what it is. So, if a
5 judge wants -- and I can't -- that's what I'm
6 telling you. I'm telling you that Judge Colton
7 lied. Nothing in the return is true. Nothing.
8 I wrote it all. I got it. She said -- this is
9 the biggest one. She said that she limited the
10 testimony to six months and then everything that
11 she references to justify giving a restraining
12 order is all past six months. She contradicts
13 herself right there. That's one big one. I have
14 the return here. Do you want me to read it and
15 point out.

16 THE COURT: I've read everything that has
17 been filed here in the Court.

18 MR. MILLER: Well, Your Honor, to answer the
19 question as far as if you intentionally lie and
20 that is what I'm saying. I mean, she did it too
21 many times for it to be --

22 THE COURT: You're accusing the judge of
23 intentionally lying?

24 MR. MILLER: Yes, Your Honor.

25 THE COURT: That's a serious allegation,

1 sir.

2 MR. MILLER: Your Honor, I spent 40 days in
3 jail behind nothing but lies. I mean, I know -

4 THE COURT: I don't want to hear -- I don't
5 want to hear any more accusations of this judge
6 lying. I want to hear the facts.

7 MR. MILLER: Well, I don't have any facts,
8 Your Honor. The facts is to me since the judge
9 lied, in other words, I heard -- I have
10 witnesses here who heard the testimony. So, if
11 you hear the testimony and the judge writes
12 something exactly opposite of what's said what
13 -- that's the judge. You can't do anything.
14 That's the first thing I said. I said I
15 apologize.

16 When a person in a position of authority
17 desecrates that seat --

18 THE COURT: I told you, sir, I'm not going
19 to hear any more of that. We only here on
20 appeal of this case. I only want to hear the
21 facts of this case. I don't want to hear any
22 more accusations about the judge lying.

23 MR. MILLER: Your Honor, everything in the
24 appeal is wrong. That's the facts of the case
25 and I mean I thought Judge McKinnon said that

1 this case has been heard by a jury and the
2 verdict has been given which was not guilty. I
3 thought that implied that -- I mean, I interpret
4 that the restraining order had no place because
5 I was found not guilty by a jury trial.

6 THE COURT: When did Judge McKinnon -- did
7 he issue an order?

8 MR. MILLER: Yes, he issued an order.

9 THE COURT: Stating that?

10 MR. MILLER: Yes, sir, it's a Form 4 order.
11 I have it. You can look it up.

12 You don't have a Form 4 order from Judge
13 McKinnon?

14 THE COURT: I'm bringing it up right now.

15 MR. MILLER: Your Honor, I'm telling you the
16 truth. I understand it's very difficult for a
17 judge to hear about another judge, but that's
18 been my whole case from the beginning.

19 You're the 18th judge I believe that this
20 case has been before. It's between 17 and 19
21 and it's just like I said from the very
22 beginning, it's a very bad situation for
23 everybody. I'm in serious trouble. The City of
24 Rock Hill is in serious trouble. The judges
25 that have issued these -- these -- these orders,

1 they're just totally wrong. These facts -- it's
2 a bad situation. I don't know what to do other
3 then to tell the truth. I'm just telling the
4 truth, and if you can't find that order I have
5 it.

6 THE COURT: I looking at it right now. He
7 denied your motion. Judge McKinnon denied your
8 motion. You had requested -- Judge McKinnon
9 ordered that the Court didn't have jurisdiction
10 at the time. That the circuit court only has
11 appellant jurisdiction over a judgement from
12 magistrate's court.

13 Judge McKinnon said that you requested the
14 Court to stay a restraining order pending the
15 appeal being heard by the circuit court.
16 Therefore appellant, meaning you, your motion to
17 quash restraining order is denied.

18 He denied your motion. Judge McKinnon
19 denied your motion. He ruled against you.

20 MR. MILLER: Yes, Your Honor, that's the
21 first order. There is more than one. In other
22 words, there has been several orders issued on
23 this appeal. I'm talking about the very last
24 order. That was the first order that was issued
25 and that brought me before Judge Salvini. That

1 was Judge Salvini, and Judge Salvini is the one
2 who gave me a copy of the return. I had never
3 saw a copy of the return. It had been out for a
4 while and Judge McKinnon issued a Form 4 order
5 where he wrote that this matter has been decided
6 by a jury trial and a verdict has been rendered.
7 I have that order.

8 THE COURT: I'm looking at Judge McKinnon --
9 the last order of Judge McKinnon says this
10 court's order of earlier today was erroneously
11 marked jury verdict --

12 MR. MILLER: Oh, I didn't get that.

13 THE COURT: When it's a decision by the
14 court. This order is substituted for today's
15 prior order. The text remains the same.

16 The appellant, meaning you, has requested
17 expedited hearing and the matter shall be heard
18 the next roster on December the 16th.

19 MR. MILLER: Your Honor, what you just read
20 I did not get that. The order that I have says
21 -- I mean it's written. This matter has been
22 heard. Tried by jury and a verdict has been
23 rendered. That's the order I have. I didn't
24 have anything about a correction what you just
25 read. I never received that as God is my

1 witness.

2 THE COURT: Judge McKinnon denied your
3 motion. You had requested the stay of the
4 restraining order and an expedited request and
5 Judge McKinnon denied your motion.

6 All right, anything else on the facts of
7 this case? Anything else? I will give you an
8 opportunity to be heard on your appeal. Anything
9 else?

10 MR. MILLER: The basis -- well, I might as
11 well just go through -- you can stop me, but the
12 basis of it is the judge -- which I've already
13 said -- is just not telling the truth. In other
14 words, there is a conspiracy to find me guilty.
15 I mean, what I've written in previous papers is
16 that Bryan Stevenson is a Harvard civil rights
17 lawyer and he said, "slavery did not end in
18 1885, it just evolved:

19 THE COURT: Mr. Miller, you need to talk
20 about the trial itself. What are your grounds
21 for appeal on the facts of the case?

22 MR. MILLER: The facts, Your Honor, the only
23 facts that the decision was made on are facts
24 that came out of the judge's head, Judge
25 Colton's head, and everything that she wrote is

1 100% false. I have witnesses here who will say
2 -- both of these witnesses who are here today
3 they sat in there. They have submitted -- you
4 should have affidavit from Melissa.

5 THE COURT: Let me just for the record, that
6 order denying your motion I just want to make
7 sure on the record, Judge Salvini issued that
8 order. Judge Salvini is the one that issued the
9 order denying your motion to quash the
10 restraining order.

11 MR. MILLER: Yes.

12 THE COURT: That was Judge Salvini. The
13 order prior to Judge Salvini --

14 MR. MILLER: Your Honor, I received an order
15 from Judge McKinnon after judge -- after Judge
16 Salvini. What happened is I came court. Judge
17 Salvini came me a copy of the return. I had
18 never had a copy of the return at that time.
19 She asked Miss Miller and she asked myself, she
20 said, "do you all have a copy of the return?" I
21 said, "I do not." She gave us a copy of the
22 return. She said, you need to answer the copy
23 -- you need to answer the return. And I
24 answered the return on the Friday before
25 Thanksgiving and then the day before

1 Thanksgiving I got an order from Judge McKinnon
2 saying -- let me show it to you. Let me just
3 get that.

4 If I don't have a copy of it in my file I
5 know I can pull it up. I can pull it up on my
6 phone if you let me get my phone.

7 THE COURT: I have been looking at all the
8 orders issued in this case that have been filed
9 by Judge McKinnon and Judge Salvini.

10 MR. MILLER: Your Honor, this was emailed to
11 me from the Court. I mean, if you let me get on
12 my phone I can pull it up and show it to you.
13 If I don't have it in my papers here. Which I
14 might not have it because I didn't feel the need
15 to bring it.

16 THE COURT: What are you arguing against
17 Judge McKinnon's order?

18 MR. MILLER: I thought this was a formality.
19 I thought Judge McKinnon -- this is what the
20 order said.

21 THE COURT: The only order from Judge
22 McKinnon is he said it was an erroneously marked
23 jury verdict.

24 MR. MILLER: That's got to be it. I didn't
25 receive that part. In other words, I received

1 the one that was marked jury verdict. I did not
2 receive anything saying it was erroneous. I did
3 never received that. Does that say that came to
4 me?

5 THE COURT: It was filed and sent to you.
6 So the order from Judge McKinnon is just all it
7 was, was an order saying instead of jury verdict
8 it was a decision by the Court and he just
9 substitute. That's all. He said the text
10 remains the same in his order.

11 MR. MILLER: Your Honor, I promise you
12 that's -- I mean, I did not receive that. I can
13 show you the one. You can look at my emails and
14 I did not receive an email from the Court.
15 Again, it said, this matter has been decided by
16 a jury trial and a verdict has been rendered.

17 Now what you just read he only affirmed
18 that he is saying that order was sent to me
19 erroneously, but I didn't receive anything.

20 THE COURT: That was just to declare he was
21 saying inadvertently stated jury verdict and it
22 wasn't a jury. It was decision by the
23 Magistrate. That's all that he is saying. It
24 was not a jury verdict. The matter that you
25 heard in the magistrate's court was with Judge

1 Colton. There was no jury. You didn't go in
2 front of a jury.

3 MR. MILLER: I understand. That's -- in
4 other words what I thought -- I knew that.
5 That's exactly -- I knew that. That's all I
6 received from the appellant court. So what I
7 understood, which I believe to be the case, is
8 that this was a continuation that the respondent
9 was attempting to charge me with harassment
10 again because that's basically what this amounts
11 to. She's trying to do everything that I found
12 by jury trial, she's trying to do it all again.
13 These are the exact same charges that I was
14 found not guilty by a jury. And Your Honor,
15 this is not going to stop. I told them two
16 years ago that this is what she was going to do.

17 THE COURT: Let's again, is there any
18 additional evidence that the judge erred in as
19 far as the evidence? What is the evidence that
20 she erred in?

21 MR. MILLER: Your Honor, if a judge says
22 something and has no recording and it is
23 accepted what the judge says then the person is
24 doomed.

25 In other words, if you believe Judge Colton

1 I'm guilty. I mean, nothing she said on the
2 return is a lie. That's why I don't have a
3 recording. I have witnesses here today that can
4 tell you that what she said was totally
5 erroneously. Everything she said. They're here
6 today. They can tell you. They can testify. I
7 have affidavits from them saying what she said
8 is not true.

9 In other words, Your Honor, I know you
10 believe that it's offensive wear a robe, but you
11 got to believe corrupt judges exist.

12 THE COURT: I'm not going to hear that, Mr.
13 Miller. I'm not going hear that again.

14 MR. MILLER: I won't say it again.

15 THE COURT: I will take this matter under
16 advisement and let you know my decision.

17 MR. MILLER: Is that it, Your Honor?

18 THE COURT: That is it.

19 MR. MILLER: I apologize, Your Honor.
20 Sorry.

21 MS. MILLER: Your Honor, can I ask one
22 question please.

23 As of right now the restraining order is in
24 place.

25 THE COURT: The order from Judge Colton is

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still in effect until the appeal is decided.

MS. MILLER: Okay, thank you.

MR. MILLER: Thank you, Your Honor.

THE COURT: Thank you.

(END OF TRANSCRIPT)

C E R T I F I C A T E

I, the undersigned Aileen Butler, Official Court Reporter for the 16TH Judicial Circuit of the State of South Carolina, do hereby certify that the foregoing is a true, accurate, and complete transcript of record of all the proceedings in the captioned case, in the Circuit Court for York County, South Carolina, on the 17th day of December, 2025.

I do further certify that I am neither of kin, counsel, nor interest to any party hereto.

April 17, 2026

Aileen Butler

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STATE OF SOUTH CAROLINA)
COUNTY OF YORK)
Johnny E. Miller,)
Appellant)
vs.)
Jacqueline Miller)
Respondent)

IN THE MAGISTRATES COURT
Common Pleas Case No. 2025 CP46-04122
Magistrate Civil Case No. 2025CV4610300055
RETURN ON APPEAL

CAT/EBENEZER
22OCT'25 15:45
MAGISTRATE

This matter is on appeal from the Magistrate Court for Catawba/Ebenezer Townships, York County, South Carolina, Jennifer S. Colton, Presiding Judge.

Appellant filed an appeal of a Magistrate's Restraining Order on October 20, 2025 with the Court of Common Pleas. The Magistrate Court was served with the Notice of Appeal on October 25, 2025.

This matter was tried on July 24, 2025 and the written notice of the Judgment was personally given to the parties at the conclusion of the trial. Both Appellant and Respondent appeared pro se.

Appellant filed a Motion to Dismiss and/or Revoke the Court's order on August 9, 2025 and an Amended Motion to Dismiss on October 1, 2025. The Court dismissed both Motion to Dismiss and/or Revoke the Court's order as it was not a proper post-trial motion before the Court under either the Magistrate Rules of Procedure or the South Carolina Rules of Civil Procedure. Assuming that the motion *could* be construed as a Motion for a New Trial under Magistrate Rule 19, the motion was not timely filed. Similarly, could the motion be construed as a Motion for Relief from Judgement or Order under Rule 60(a), the motion was not timely filed and the Appellant plead no cause of action nor proffered any basis for relief under Rule 60(b).

PRE-TRIAL MOTIONS:

NONE

WITNESSES:

The Respondent called the following witness:

1. Jacqueline Miller, Plaintiff.

The Appellant presented the following witness:

1. Johnny Miller, Jr., Defendant;
2. Marchevious Caldwell; and
3. Melissa Randall.

EXHIBITS:

Respondent:

1. Text Message from Appellant to Respondent

Appellant:

1. Copy of Defendant's Answer to the Restraining Order; and
2. Petition from the Church At Rock Hill.

Court Exhibits:

1. DVD offered by the Appellant show harassment by the Respondent;
2. Affidavits offered by Appellant;
3. Copy of 2023 Restraining Order petition and denial.

TESTIMONY:

A bench trial was held on July 24, 2025. The proceedings were electronically recorded and a Clerk of Court was present to witness said recordings and the proceedings specifically because of the pendency of criminal case for harassment and the numerous ex parte emails to this Court by the Appellant. However, when this Court attempted to recover the recording, the Court was unable to retrieve the digital recording.

Respondent testified that she and the Appellant were married for 42 years and divorced in 2022. In April of 2023, the Appellant began sending emails to the

Respondent who responded by asking the Appellant to stop contacting her. Subsequently, the Appellant sent the Respondent 28 emails. Respondent was arrested for Harassment by the Rock Hill Police Department. In addition, the Respondent continued come to Respondent's place of employment at the Rock Hill Police Department and filing false police reports and citing that it was a public space.

Respondent further testified that the last reported contact Appellant continued to make attempts to contact her after the arrested. These events occurred while a No Contact Order issued by the Rock Hill Municipal Court was active as criminal charges were pending during this time frame, and Respondent's attempts to contact the Appellant occurred in spite of a no contact order. Specifically, she testified that the Respondent appeared at a football game that the Respondent was attending and attempted to sit near her and make comments directed at her stating that, "I can talk to you. You just crazy, she's just crazy." Respondent further testified that at another sporting event, the Appellant sat down behind her and said "Do you still love God, Jacqui? Speak in tongues for me."

Respondent further testified that the Appellant contacted the Respondent via text message on November 19, 2024. Plaintiff's Exhibit 1. Appellant asked the Respondent to remove her from any threads to which Appellant specifically responded to the Respondent telling her "You know it's something wrong with her. You need to drop my name and go back to Brown." Brown is the Respondent's maiden name.

Respondent testified that on December 17, 2024, the Respondent's mother was at Piedmont Medical Center for medical reasons. Appellant came to the hospital for the surgery and entered into the prep room. Appellant positioned himself next to the Respondent and asked the Respondent to hold his hand to pray. When the Respondent refused, the Appellant stated that, "She won't ever hold my hand." On December 24, 2024, when the Respondent's mother was discharged from the hospital, Appellant *again* came to the hospital and walked by the Respondent and told her, "You know the judgement of God is on your life."

Respondent further testified that on May 8, 2025, she was attending a graduation and the Appellant tried to take pictures of her and followed her laughing.

Appellant testified that he was present at the graduation but denied taking pictures and stated that he only responded to the Respondent after she spoke to Appellant first. Appellant did not recall sending Plaintiff's 1 to the Respondent. Appellant denied sitting next to the Respondent at sporting events, but state that, "I want to sit as a family." Appellant testified that he did speak to the Respondent at a family dinner at Olive Garden, but stated that it was only because the Respondent spoke to him first. Appellant testified that he knew a No Contact Order existed but that it was "bogus".

Appellant continued to testify that a "RICO" case should be brought against the Rock Hill Police Department because they conspired with his wife (Respondent who is legally his ex-wife). Appellant testified that his wife is "evil" and that he prays for her. Appellant also accused his wife of adultery.

Appellant attempted to offered into evidence Defendant's Exhibit 1, which is a copy of the answer (in part) Appellant filed in response to the pleadings. Defendant's Exhibit 2, is a petition from the Church at Rock Hill. Both were admitted without objection. Appellant offered Court Exhibits 1-3, a DVD, affidavits of non-testifying 'witnesses', and a copy of a 2023 restraining order that was filed by Respondent. These items were not admitted into evidence as Exhibits 1-3 were not relevant as the referenced a prior restraining order and the Court ruled that any actions prior to 2023 and this previous denial of the Restraining Order of 2023 were not relevant. The affidavits were excluded as hearsay. Exhibits 1-3 were made Court Exhibits.

Marchevious Caldwell to the stand. Caldwell testified that he went to the church with parties and knew them for 21 years. Appellant attempted to elicit testimony from Mr. Caldwell regarding non-relevant evidence, requesting that Caldwell testify to conduct of the Respondent harassing the Appellant. The Court limited testimony to the prior six months preceding the restraining order. Caldwell testified he had not seen the Respondent do anything in the last six months.

Melissa Randall testified that she attended a MLK Breakfast in January of 2025, which was attended by the Respondent and Appellant. Randall testified that she and the Appellant were sitting at the same table and that the Respondent made it a point to speak to someone at Randall's table and that Respondent was acting "extra".

FINDINGS:

The Court found the Respondent's testimony to be credible and compelling. The Appellant, despite having a No Contact Order restraining him from contact with the Respondent continued to contact her, appear at sporting events, civic events, and family functions *and* attempt to engage her in conversations. Appellant's continued reference to the Respondent, his ex-wife, as his 'wife' and testimony that he "just wanted his family to be together" evidence his continuing denial of the dissolution of his marriage and desire to reconcile with the Respondent. The Court determined that Respondent demonstrated by the greater weight or preponderance of the evidence that Appellant continue to engage in a pattern of conduct in the private life of the Respondent that served no legitimate purpose.

The Court denied the motion for dismiss and/or revoke the restraining order. The Court treated the motion as a Motion for Relief from Judgment or Order. The Court found that the motion was untimely as it was filed 10 days after notice of the judgment was given to the Appellant. Similarly, if the motion could be construed as a Motion for a New Trial, it is also untimely. The Appellant was given the opportunity to proffer a basis for the motion that would support relief under Rule 60(b), but was unable to do so and argued that he should be able to retry the case because there is no recorded record due to failure of the recording device to preserve transcript of the trial. Similarly, the Court found that the Appellant's argument that he was exonerated in a criminal trial for Harassment to be unconvincing and not support by law, nor was the Appellant able to provide any good faith basis to support the motion.

POST TRIAL MOTIONS:

Appellant filed a Motion to Dismiss and/or Revoke the Court's order on August 9, 2025 and an Amended Motion to Dismiss on October 1, 2025. The Court dismissed both Motion to Dismiss and/or Revoke the Court's order as it was not a proper post trial motion before the Court under either the Magistrate Rules of Procedure or the South

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Carolina Rules of Civil Procedure. Assuming that the motion *could* be construed as a Motion for a New Trial under Magistrate Rule 19, the motion was not timely filed.

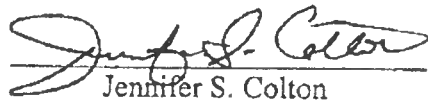
Similarly, could the motion be construed as a Motion for Relief from Judgement or Order under Rule 60(a), the motion was not timely filed and the Appellant plead no cause of action nor proffered any basis for relief under Rule 60(b).

Appellant did argue that the civil Restraining Order should be dismissed because Appellant was found exonerated in City of Rock Hill vs Miller of Harassment.

ATTACHMENTS:

1. Respondent Exh. 1: Text Message from Appellant to Respondent;
2. Appellant Exh. 1: Copy of Defendant's Answer to the Restraining Order;
3. Appellant Exh. 2: Petition from the Church at Rock Hill;
4. Court Exh 2: Affidavits offered by Appellant;
5. Court Exh. 3: Copy of 2023 Restraining Order petition and denial;
6. Summons (Restraining Order);
7. Affidavit of Service;
8. Defendant's Answer to the Restraining Order Request;
9. Restraining Order;
10. Defendant's Emergency Motion for Continuance;
11. Motion to Dismiss and/or Revoke Restraining Order;
12. Plaintiff's Motion to the Court in Support of Continue Restraining Order;
13. Amended Motion to Dismiss and/or Revoke Restraining Order;
14. Appellant's Notice of Civil Appeal; and
15. Packet of ex Parte emails to the Court.

October 22, 2025


Jennifer S. Colton
Magistrate

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STATE OF SOUTH CAROLINA
COUNTY OF YORK

Johnny E. Miller
Appellant

vs.

Jacqueline Miller
Respondent

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IN THE YORK COUNTY CIRCUIT
COURT OF COMMON PLEAS
Case No. 2025CP4604122

APPEAL FROM THE CATAWBA/EBENEZER
MAGISTRATE COURT

Case No. 2025OR4610300055
THE HONORABLE JENNIFER COLTON

**APPELLANT'S ANSWER TO
RETURN ON APPEAL**

The Appellant in this matter, Johnny E. Miller, hereby responds to the Magistrate's Court "Return On Appeal" (the *Return*). Exhibits CP-A thru CP-I are attached. CP stands for Common Plea.

The Appellant apologizes in advance for having to say what he says in this Answer, however, when people who hold positions of high honor and respect, desecrate that position by immoral, irrational, and corrupt behavior....it is impossible to tell the truth about the matter without the honor of that person also being desecrated. In a recent legal proceeding that the Appellant was in, the following question was asked of a witness; "Do you think it's right to call someone evil?" The witness's response to the question was; "I think it's wrong to be evil." So, is it right to call a judge immoral, irrational, and corrupt? The answer is it's wrong for a judge to be immoral, irrational, and corrupt. Do immoral, irrational, and corrupt judges exit? The answer is yes.

As an example that serves as the epitome of the deranged corrupt mind that the Appellant discerns as the source of the *Return On Appeal*, and that also sets the tone for the Appellant's Answer, the Appellant cites and quotes the following excerpt from the *Return*;

"Appellant's continued reference to the Respondent, his ex-wife, as his 'wife' and testimony that he "just wanted his family to be together" evidence his continuing denial of the dissolution of his marriage and desire to reconcile with the Respondent."

The facts concerning the court's false statement above are clearly revealed by documents filed in the York County SC Family Court wherein the Appellant asked

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the Family Court of York County to grant him a divorce from the Respondent over the Respondent's objection to a divorce. It is irrational to ask for a divorce, yet think your "family" can still be together. I, the Appellant Johnny E. Miller, never made the statement ("just wanted his family to be together") that the Court puts in quotation marks without the benefit of a recording or transcript because the court "was unable to retrieve the digital recording" of the hearing which would have clearly revealed the intentions of this court in writing this incredible *Return*. The court is simply and intentionally lying. Anyone who knows the Appellant and anything about his forty-two (42) years of marriage to the Respondent surely knows that the Appellant absolutely has zero desire to reconcile with the Respondent as husband and wife, and there is zero denial on the Appellant's part that the marriage is dissolved forever. Furthermore, in the jury trial for the bogus harassment charge that the Respondent had the Appellant arrested for (wherein the Appellant was found NOT GUILTY), the Respondent testified concerning the Appellant that he divorced me...I didn't divorce him. The Appellant does not believe that he referred to the Respondent as his "wife" in the said hearing before the court as stated by the court, but it's a white female Judge's word against a black oppressed man's word in the United States of America, and we know the history of similar scenarios in the United States all the way back to Emmett Till in Mississippi in 1955 and beyond, and all the way up to Susan Smith in South Carolina in 1994 and beyond... "A BLACK MAN DID IT!"

The *Return* is more the court's fictitious narrative than it is a true representation of the testimony that was given at the July 24, 2025 hearing wherein the bogus restraining order was granted without any record of the hearing except in the court's mind. The Appellant estimates that only about five percent (5%) of what the *Return* attributes to the Respondent testifying in court is true. The other ninety-five percent is fictitious for obvious reasons that are still stated in this immediate Answer. It is absolutely appalling that the Appellant has to continue to endure this fiasco orchestrated by York County judiciary officials and law enforcement agencies that has falsely imprisoned the Appellant for forty (40) days, caused him to be fired from his job as a public school teacher, robbed of his real estate property, and severely violated his civil rights...all because he dare stand up for his 100% innocence and legal rights against corrupt officials and attorneys who are aiding and abetting the Respondent in her illegal and vindictive actions towards the Appellant. The Appellant has stated the following for the past four years throughout the legal proceedings stemming from the divorce...the longer this fiasco goes on... "the clean gets cleaner, and the dirty gets dirtier."

Furthermore, on page 2 of the *Return*, the court lists the exhibits that were supposedly presented at the July 24th hearing. For the Appellant, the said list only shows 2 exhibits....1) Copy of Defendant's Answer to the Restraining Order; and 2) Petition from the Church At Rock Hill. The court's list fails to include the following exhibits presented by the Appellant at the said July 24, 2025 hearing: **1)** The two affidavits of the two witnesses who testified on the behalf of the Appellant, Mrs. Melissa Randall and Mr. Marchavis Caldwell; **2)** Seven (7) police reports (**See Exhibit CP-I**); **3)** Nine (9) affidavits on the behalf of the Appellant against the Respondent from concerned citizens; and **4)** Order from the Honorable Judge Cousins. All of these documents were submitted to the court by the Appellant as exhibits.

Furthermore, the Appellant has no idea what the court is submitting to the Appellate Court,...the Court of Common Pleas. The Appellant has seen none of it, because it hasn't been given to him. The Appellant was only made aware that the *Return* existed by Judge Salvini at the November 14, 2025 hearing. Very respectfully, the Appellant believes that the lower court is simply conjuring up fake evidence and telling falsehoods as this case moves forward.

The Appellant's Answer will answer the Court's Return On Appeal by citing and/or quoting an excerpt directly from the Return, and immediately thereafter submit an answer to the cited and/or quoted excerpt.

1) Judge Colton: "The Court dismissed both Motion to Dismiss and/or Revoke the Court's order as it was not a proper post trial motion before the Court under either the Magistrate Rules of Procedure or the South Carolina Rules of Civil Procedure."

Appellant's Answer: Obviously, the Appellant is not an attorney, and does not know court rules, laws, and procedures like an attorney does.

Furthermore, the Appellant has had two attorneys representing him on the harassment charge from which this bogus restraining order is directly related. The Appellant's first attorney was Leland Greeley, who the Appellant paid \$5,000.00 (five-thousand dollars) for representation (**see Exhibit CP-A**). Yet, Attorney Greeley quit representing the Appellant mainly because Attorney Greeley wanted the Appellant to plead guilty to a lesser charge of harassment that the City of Rock Hill had offered. But, the Appellant was not guilty of any crime, and therefore refused to plead guilty to anything. Attorney Greeley then told the Appellant he no longer wanted to represent him because he didn't like the direction the Appellant wanted to go in by refusing to plead guilty to a lesser charge. Attorney Jane

Randall represented the Appellant for a brief period of time to get him out of jail, but she did not charge the Appellant. Attorney Randall represented the Appellant as a favor for a friend. The next attorney after Attorney Greeley who the Appellant paid for representation was Attorney Jack Swerling, who the Appellant paid \$35,000.00 (thirty-five thousand dollars) (**see Exhibit CP-B**). Attorney Swerling also quit representing the Appellant. He quit because the Appellant alleged that he (Swerling) was in cahoots with York County judiciary officials, the Rock Hill Police Department, the City of Rock Hill, and the Appellant's ex-wife (the Respondent) against the Appellant (**see Exhibit CP-C**). The Appellant has not received one single penny of that \$40,000.00 (forty thousand dollars) back from the two attorneys, yet was found NOT GUILTY by a jury while representing himself (*pro se*).

The same judge (Judge Tea Hoffmann) who signed the complaint for the Respondent to seek the bogus restraining order in this immediate matter against the Appellant, is the same judge who ordered Attorney Swerling to be released from representing the Appellant, against the Appellant's desire (**see Exhibit CP-D**). Judge Hoffmann also presided over the said jury trial in which the Appellant was found NOT GUILTY. To reiterate, Judge Hoffmann released Attorney Swerling against the Appellant's desire (**see Exhibit CP-D**) to render the Appellant defenseless without an attorney with the jury trial in which the Appellant was found NOT GUILTY and the hearing for which this immediate restraining order was granted were both imminent. By God's grace, the Appellant prevailed over the bogus charge of harassment with a NOT GUILTY verdict, but was slapped with a bogus restraining order by a court who immorally, irrationally, and corruptly ignored the evidence and testimonies at the July 24, 2025 hearing (which was not recorded) that clearly indicated that a restraining order was not warranted.

Judge Colton and Judge Hoffman are co-workers, and are both Magistrate's at the York County Catawba/Ebenezer Magistrate's Office. The Appellant has told them both while in hearings that he believes it is impossible for him to receive a fair and just trial/hearing in York County.

Furthermore, this is not the first time that the Respondent has brought bogus allegations against the Appellant in this very same venue...the Catawba/Ebenezer Magistrate's Office. In June of 2023, after having the Appellant jailed on charges that he was eventually found NOT GUILTY of, and about six months after they were divorced, the Respondent attempted to get a restraining order against the Appellant based on bogus allegations almost exactly the same as the ones she has set-forth in this immediate matter. Judge Curtis Cousins, who was the

Catawba/Ebenezer Magistrate at that time, dismissed the case and denied the Respondent the restraining order against the Appellant (**see Exhibit CP-E**). The Respondent was furious that she had to pay the \$55.00 (fifty-five dollars) court fee as the non-prevailing party.

Furthermore, the fathers of our United States Constitution and judicial system did not envision nor intend for the judicial system to evolve into completely innocent and just citizens having by general necessity (forced) to spend thousands and thousands of dollars to hire attorneys to navigate legal procedural matters in court in the simple quest for justice which comes by simply telling the truth and being honest. This court is attempting to use this twisted fate to manipulate the judicial system so that justice is not served, but instead a human's rights are severely and repeatedly violated. A NOT GUILY verdict in a jury trial is not enough for this unjust court. In this court's world, only litigants who can afford an attorney and/or who obey the orders of crooked attorneys have a right to justice according to law. In this court's world, no credence is given to truthfulness, justice, nor the merits of the case when a legal technicality and/or court procedure (wherein no party is prejudiced) is unintentionally violated by a pro se litigant. This is especially true if the court is clearly and intentionally attempting to unjustly aid and abet one litigant over another, as is the case here. Clearly this court is unjustly aiding and abetting the Respondent's unjust cause in this immediate action over the Appellant's just cause. If justice truly is blind, and if justice is what is really being pursued in this matter, then this court's interpretation and application of the law and court procedures prevent the poor from having a right to justice in legal matters.

2) Judge Colton: "Assuming that the motion *could* be construed as a Motion for a New Trial under Magistrate Rule 19, the motion was not timely filed. Similarly, could the motion be construed as a Motion for Relief from Judgement or Order under Rule 60(a), the motion was not timely filed and the Appellant plead no cause of action nor proffered any basis for relief under Rule 60(b)."

Appellant's Answer: Again...obviously, the Appellant is not an attorney, and to be clear...this court was in cahoots with Judge Hoffmann (her co-worker at the Catawba/Ebenezer Magistrate's Office, and also a white female) to render the Appellant defenseless without an attorney in this matter. Again, Judge Hoffman unjustly released Attorney Swerling from representing the Appellant against the Appellant's desire. Had the Appellant been able to acquire and keep an attorney to represent him in this matter, he would have. The Appellant attempted rigorously to

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find legal representation after Attorney Swerling quit him, but could not find an attorney to take the case, nor did he have any money left after paying \$40,000.00 to attorneys for very little to nothing. This was all part of the York County judicial system's plan... to strip the Appellant of legal defense, and to ruin him financially by getting him fired from his job as a public-school teacher because of the bogus harassment charge, for which he was found NOT GUILY.

Furthermore, the Appellant requested a recording of the July 24, 2025 hearing immediately after the hearing on the same day. The Appellant was told by Ms. Stinson (a clerk in the Catawba/Ebenezer Magistrate's Office) that it would take approximately a week or two for him to receive the recording from the court. This was a deliberate unjust ploy by the court to prevent the Appellant from filing an appeal in a timely matter by him having to wait 2 weeks for the recording, knowing that the Appellant was not an attorney, and that the Catawba/Ebenezer Magistrate's office (Judge Hoffmann) had done away with the Appellant's attorney. Consequently, the court did not give the Appellant the requested recording, stating that a "technical error" had prevented the recording from being retrieved (see **Exhibit CP-F**). The Appellant believes that this court deliberately prevented the Appellant from receiving the said requested recording, because the recording provided testimonies and evidence that is too strong for this court's lies, as set forth here in the *Return*. Clearly, a just and rational human being WOULD NOT HAVE GIVEN a greater weight and/or preponderance of the testimonies and evidence in favor of the Respondent based on the testimonies and evidence presented in the July 24, 2025 hearing before this court in this matter.

Again, the Appellant is not an attorney, but the following is case law concerning pro se litigants that the Appellant believes speaks to this matter in an important context:

All parties, *pro se* or otherwise, must comply with the Federal Rules of Civil Procedure. See Baldwin Cnty. Welcome Ctr. V. Brown, 466 U.S. 147, 152 (1984) (per curiam). However, dismissing a *pro se* plaintiff's complaint based on a failure to follow procedural rules is a harsh result. See Blakeney v. Goulston Techs., No. 3:19-cv-00688-GCM, 2020 WL 5821979, at *2 (W.D.N.C. Sept. 30, 2020). Courts should accord *pro se* litigants a "special judicial solicitude." Beaudett v. City of Hampton, 775 F.2d 1274, 1277 (4th Cir. 1985).

. Additionally, the Fourth Circuit has "repeatedly expressed a strong preference that, as a general matter, . . . claims and defenses be disposed of on their merits." Colleton Preparatory Acad., Inc. v. Hoover Universal, Inc., 616 F.3d 413, 417(4th Cir. 2010)

3) Judge Colton: "The proceedings were electronically recorded and a Clerk of Court was present to witness said recordings and the proceedings specifically because of the pendency of criminal case for harassment and the numerous ex parte emails to this Court by the Appellant. However, when this Court attempted to recover the recording, the Court was unable to retrieve the digital recording."

Appellant's Answer: Again, the Appellant believes that this court deliberately prevented the Appellant from receiving the said requested recording because the recording provided testimonies and evidence that is too strong for this court's lies as set forth here in the *Return*. The only reason the Appellant sent anything ex parte is because he has been repeatedly jailed for sending documents to the Respondent that were required by law to be sent to her as both were *pro se* litigants.

4) Judge Colton: "In April of 2023, the Appellant began sending emails to the Respondent who responded by asking the Appellant to stop contacting her. Subsequently, the Appellant sent the Respondent 28 emails. Respondent was arrested for Harassment by the Rock Hill Police Department. In addition, the Respondent continued come to Respondent's place of employment at the Rock Hill Police Department and filing false police reports and citing that it was a public space."

Appellant's Answer: On page four of six (4 of 6) of the *Return* in the next to the last paragraph which begins with "Marchevious Caldwell", the court writes, "**The Court limited testimony to the prior six months preceding the restraining order.**" Yet, the court cites evidence for its unjust decision to grant the restraining order dating back to April of 2023. Also, in the recording from the October 8th hearing before Judge Colton concerning this matter at the **18 minute and 50 seconds mark of the recording, the court states the it limited testimony to six months based on a motion by the Appellant. As stated in the Appellant's Notice Of Civil Appeal, this is absolutely untrue.** And for the record, to this very day, the Appellant has never saw the 28 emails.

5) Judge Colton: "Respondent further testified that the last reported contact Appellant continued to make attempts to contact her after the arrested. These events occurred while a No Contact Order issued by the Rock Hill Municipal Court

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was active as criminal charges were pending during this time frame, and Respondent's attempts to contact the Appellant occurred in spite of a no contact order. Specifically, she testified that the Respondent appeared at a football game that the Respondent was attending and attempted to sit near her and make comments directed at her stating that, "I can talk to you. You just crazy, she's just crazy." Respondent further testified that at another sporting event, the Appellant sat down behind her and said "Do you still love God, Jacqui? Speak in tongues for me."

Appellant's Answer: The parents of the Appellant taught him to always tell the truth. They told him that one lie leads to another, and to another, and on and on...and that when you're telling lies, you can't keep up with or remember how they are supposed to synchronize with each other, so eventually you'll get caught in the lies. The Appellant believes such is the case here with the court. Again, the court said it limited testimony to six months before the restraining order (July 2025). The "football game" and "another sporting event" that the court has to be speaking of are two of several (5 or 6) that the Respondent and the Appellant both attended because their granddaughter is a cheerleader at Dutchman Creek Middle School. The Respondent and the Appellant have never been in close proximity to each other at any sporting event since being separated and/or divorced where their grandchildren were not the focus. The Appellant always sits with his daughter and her husband, who are the parents of the cheerleader at Dutchman Creek, and with their second daughter...the cheerleader's sister. In the context of the said "football game" and "another sporting event", the Appellant's daughter, her husband, and their two daughters are the Appellant's family. The Respondent is absolutely not a part of the Appellant's "family." The Appellant sits with his family at these football games. The Appellant has absolutely never initiated conversation or interaction with the Respondent by speaking to her, making gestures towards her, or in any other way while a No Contact Order has been in place against him concerning the Respondent. This court, again, is lying.

Furthermore, football season for Dutchman Creek Middle School is from August when school starts, until late October or early November at the latest. **If testimony was limited by the court to the prior six months before the restraining order (which was granted in July of 2025), then the said football game had to be before the six months limit. The 2025 football season for Dutchman Creek is August 2025 thru October/November 2025. So, the testimony could not have been concerning a football game in the 2025 season. The 2024 football season for Dutchman Creek was from August 2024 thru October/November 2024.**

This is the closest football season that the court could possibly be speaking of, and it is not within the six months limit prior to the restraining order.

Furthermore, from January 2024 until February 2025 while the said harassment charge was not pressed by Solicitor Shealy of the Rock Hill Municipal Court, there WAS NOT a No Contact Order in place against the Appellant. The No Contact Order was only reinstated in February of 2025 when Judge Jane Modla of the Rock Hill Municipal Court reinstated the bogus harassment charge (see Exhibit CP-G) that the Appellant was found NOT GUILTY of by a jury trial. So, the bogus NO CONTACT ORDER was not in place from January of 2024 through February 2025. The said football game had to have occurred during a time when there WAS NOT a No Contact Order in place against the Appellant. Again, the court has lied.

Furthermore, no charges were "pending" as the court fictitiously asserts, because the charges had been not-pressed. This is another falsehood by the court.

Slave masters have ultimate jurisdiction over their slaves because they own their slaves. Slaves are chattel to their masters. Therefore, the slave master can subject their slaves (who are under the jurisdiction of the slave master...much like a restraining order places a person under the jurisdiction of the court that granted the restraining order) to be taunted and abused by anyone without any recourse or protection for the slave, unless the slave master decides to protect his or her slave.

6) Judge Colton: "Respondent further testified that the Appellant contacted the Respondent via text message on November 19, 2024. Plaintiff's Exhibit 1. Appellant asked the Respondent to remove her from any threads to which Appellant specifically responded to the Respondent telling her "You know it's something wrong with her. You need to drop my name and go back to Brown." Brown is Respondent's maiden name."

Appellant's Answer: The Appellant absolutely never contacted the Respondent via a text message on November 19, 2024 as the court asserts. And again, November 19, 2024 would be beyond the 6 months limit prior to the restraining order

7) Judge Colton: “Respondent testified that on December 17, 2024, the Respondent’s mother was at Piedmont Medical Center for medical reasons. Appellant came to the hospital for the surgery and entered the prep room. Appellant positioned himself next to the Respondent and asked the Respondent to hold his hand to pray. When the Respondent refused, the Appellant stated that, “She won’t ever hold my hand.” On December 24, 2024, when the Respondent’s mother was discharged from the hospital, Appellant *again* came to the hospital and walked by the Respondent and told her, “You know the judgement of God is on your life.”

Appellant’s Answer: The Appellant is a Christian minister, and normally prays at general gatherings of various sorts for various reasons. The Appellant has never initiated any conversation with the Respondent since around June of 2021 when they separated, leading to divorce. The Appellant has only sent the Respondent documents required by law when they were/are both *pro se* litigants. To this very day the Appellant has a close relationship with the Respondent’s mother, Ms. Mary Aileen Brown. The Respondent’s family loves and respects the Appellant as a son and brother. In fact, the Respondent’s natural born sister, Cynthia Brown-Stover, testified in the divorce hearing on the behalf of the Appellant against the Respondent. On the day cited by the court that Ms. Brown had the surgery, the Respondent’s natural born brother, Tommy Brown, rode to the hospital with the Appellant. Mr. Brown called and asked the Appellant to pick him up to take him to the hospital for his mother’s surgery because he could not drive because he himself had recently had surgery. The Appellant absolutely did not ask the Respondent to “hold his hand.” Again, this statement is fictitious, and a blatant lie. Evidently, the Respondent has put it in the head of this court that the Appellant wants to be around or near the Respondent. The Appellant can think of very few things, if any, that could be farther from the truth than that the Appellant wants to be around or near the Respondent. And again, December 17th and 24th, 2024 would be beyond the 6 months limit prior to the restraining order.

8) Judge Colton: “Respondent further testified that on May 8, 2025, she was attending a graduation and the Appellant tried to take pictures of her and followed her laughing. Appellant testified that he was present at the graduation but denied taking pictures and stated that he only responded to the Respondent after she spoke to Appellant first. Appellant did not recall sending Plaintiff’s 1 to the Respondent. Appellant denied sitting next to the Respondent at sporting events, but state that, “I want to sit as a family.” Appellant testified that he did speak to the Respondent at a

family dinner at Olive Garden, but stated that it was only because the Respondent spoke to him first. Appellant testified that he knew a NO Contact Order existed but it was "bogus".

Appellant's Answer: The graduation cited by the court here was the graduation of Lauren Miller from Winthrop University. Lauren Miller is the natural born daughter of Gregory Miller. Gregory Miller is the natural born brother of the Appellant, Johnny Miller. Among others, the Appellant's natural born sister (Joyce Miller), and Lauren Miller's sister, mother, and maternal grandmother were also at the graduation. The Appellant was with "his family....the Millers"....his brother (Gregory Miller), his brother's daughter (Lauren Miller the graduate), Gregory Miller's other daughter (Rhegan Miller...the sister of Lauren the graduate,) and his sister (Joyce Miller) at the graduation. The Respondent added herself to the Miller family at the graduation simply to cause trouble and tell lies as she most often does. After the graduation, the Miller Family (Gregory, Joyce, and the Appellant), Lauren, Lauren's sister Rhegan, and their mother, and grandmother went to "family dinner" at the Olive Garden. The Respondent more or less invited herself to the said dinner, and was the only person there who was not a part of the family. The Appellant cites this example among many many others that could be cited as evidence that the Respondent is the one in denial (not the Appellant) of the dissolution of her marriage to the Appellant, and she still desires to reconcile with the Appellant to the extent that she has harassed and stalked the Appellant for well over three years....while aided and abetted by the Rock Hill Police Department (her employer) and other York County judiciary officials and agencies.

9) Judge Colton: "Appellant continued to testify that a "RICO" case should be brought against the Rock Hill Police Department because they conspired with his wife (Respondent who is legally his ex-wife)."

Appellant's Answer: The Appellant has written in several legal documents that a RICO case should be brought against the Rock Hill Police Department for their corruption using tax-payers money to fund their illegal exploits, but the Appellant, to the best of his recollection without a recording of the said July 24th hearing, absolutely did not say or testify anything whatsoever about RICO in that hearing before this court. Again, as far as the Appellant can recall, this is a blatant lie. The court fictitiously and diabolically attributes testimony about RICO to the Appellant in the *Return* in an effort to trigger emotions and bitterness from York County judiciary authorities and other York County law enforcement agencies against the

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Appellant, who by God's grace is a 100% innocent authentic Christian in the midst of all this chaos and corruption.

10) Judge Colton: "Defendant's Exhibit 2, is a petition from The Church At Rock Hill."

Appellant's Answer: The Church At Rock Hill has been an eyewitness for many years of the Respondent's antics, and some of its parishioners themselves have been targeted by the Respondent.

11) Judge Colton: "Appellant attempted to elicit testimony from Mr. Caldwell regarding non-relevant evidence, requesting that Caldwell testify to conduct of the Respondent harassing the Appellant. The Court limited testimony to the prior six months preceding the restraining order."

Appellant's Answer: The Appellant did not attempt to elicit anything from Mr. Caldwell. The Appellant only asked Mr. Caldwell to tell the truth in court about what he knows as it pertains to the matter at hand. Mr. Caldwell has known the Respondent for over 20 years, and they were close at one time. Mr. Caldwell and the Respondent for many years went to annual birthday luncheons together due to the fact that their birthdays are only 2 days apart... March 8th and March 10th respectively.

12) Judge Colton: "The Court found the Respondent's testimony to be credible and compelling. The Appellant, despite having a No Contact Order restraining him from contact with the Respondent continued to contact her, appear at sporting events, civic events, and family functions *and* attempt to engage her in conversations. Appellant's continued reference to the Respondent, his ex-wife, as his 'wife' and testimony that he "just wanted his family to be together" evidence his continuing denial of the dissolution of his marriage and desire to reconcile with the Respondent. The Court determined that Respondent demonstrated by greater weight or preponderance of the evidence that Appellant continue to engage in a pattern of conduct in the private life of the Respondent that served no legitimate purpose."

Appellant's Answer: The Respondent's testimony was not credible, nor compelling. It was fictitious and diabolical. The No Contact Order assertion has been proven to be false beyond a reasonable doubt....a greater standard than the weight and/or preponderance of the evidence. The information given by the court in the *Return* about "sporting events, civic events, and family functions and attempt to engage her in conversations" is all false and/or misguided. Again, the Appellant asked the Family Court of York County to grant him a divorce from the Respondent over the Respondent's objection to a divorce. It is irrational to ask for a divorce, yet think your "family" can still be together. I, the Appellant Johnny E. Miller, never made the statement ("just wanted his family to be together") that the Court puts in quotation marks without the benefit of a recording or transcript because the Court "was unable to retrieve the digital recording." The Court is simply and intentionally lying. Anyone who knows the Appellant and anything about his 42 years of marriage to the Respondent surely knows that the Appellant absolutely has zero desire to reconcile with the Respondent as husband and wife, and there is zero denial on the Appellant's part that the marriage is dissolved forever. Furthermore, in the jury trial for the bogus harassment charge that the Respondent had the Appellant arrested for (wherein the Appellant was found NOT GUILTY), the Respondent testified concerning the Appellant that he divorced me....I didn't divorce him. The Appellant does not believe that he referred to the Respondent as his "wife" in the said hearing before the Court as stated by the Court, but it's a white female Judge's word against a black oppressed man's word in the United States of America, and we know the history of similar scenarios in the United States all the way back to Emmett Till in Mississippi in 1955 and beyond, and all the way up to Susan Smith in South Carolina in 1994 and beyond...**"A BLACK MAN DID IT!"**

In the Appellant's affidavit dated January 26, 2024, in response to Solicitor Shealy's not pressing the harassment case, the Appellant proffered exactly what is now happening and that has happened over the past four years (**See Exhibit CP-H**). In the said affidavit, near the bottom of page 2, the Appellant specifically writes (bold emphasis added):

"To address the matter of Ms. Miller and myself possibly meeting each other at family gatherings concerning our grandchildren, I have always understood that this is something that our grandchildren's parents control. My concern is that during these gatherings Ms. Miller will again tell lies and attempt to have me incarcerated repeatedly...as history reveals this is her pattern. **This immediate letter is to put all involved on notice that I fully suspect and expect**

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my ex-wife, Jacqueline Miller, to continue her mission to destroy me with the full support of the Rock Hill Police Department behind her. At this immediate time, Ms. Miller and the City of Rock Hill have no incentive to stop harassing me and maligning my name."

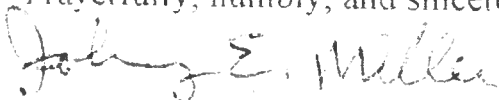
All the police reports (at least seven) (**See Exhibit CP-I**), citizen complaints (at least 4) filed by the Appellant against the Respondent, the affidavits from concerned citizens (at least 9), and a petition for help from The Church At Rock Hill against the Respondent's harassing and stalking behavior have been totally ignored by the York County law enforcement agencies and judiciary authorities. This is utter corruption in the Appellant's understanding, and is tantamount to the Rock Hill Police Department, the City of Rock Hill, and other York County judiciary authorities aiding and abetting the Respondent in her consistent pattern of illegal behavior, including the stalking and harassing of the Appellant.

Judge Salvini told the Appellant at the November 14, 2025 hearing that she would put a request in the case file of this immediate matter that the hearing of the appeal be expedited due to a restraining order possibly limiting the interaction of the Appellant with his family over the upcoming holidays

The Appellant's ultimate goal in this entire matter is that God through Jesus Christ ...the Appellant's Lord, Savior, and Master...be glorified by the actions of authentic Christians. The Appellant forgives and loves all those who oppose him, including this court and his ex-wife. The Appellant also chooses peace and unity through truth, forgiveness, and righteousness for our community of York County. The Appellant RESPECTS ALL, BUT FEARS NONE EXCEPT GOD.

For reasons stated herein and others, the Catawba/Ebenezer Magistrate is in error granting the restraining order to the Respondent against the Appellant. The appeal should be granted, and the bogus restraining order revoked, quashed, or whatever legal term is appropriate to do away with the restraining order against the Appellant, making the restraining order null and void as soon as possible.

Prayerfully, humbly, and sincerely submitted,



Johnny E. Miller
Appellant (Pro Se)
November 21, 2025

CP-1

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COMMON PLEA EXHIBITS

(NOTED AS EXHIBIT CP-LETTER)

EXHIBIT

CP-A

CP-3
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**LELAND B. GREELEY, P.A.
ATTORNEY**

130 EAST MAIN STREET, SUITE 202
ROCK HILL, SOUTH CAROLINA

Post Office Box 2981
Rock Hill, SC 29732

(803)329-0088
FAX: (803)329-4310

RECEIPT

DATE: 6/19/, 2023.

CLIENT NAME: Anthony Milled

MATTER: Ellis Road

Amount paid: \$ 5,000.-

Paid by: Cash Check ✓ Money Order

Received by: [Signature]

THANK YOU!

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CP-4

EXHIBIT

CP-B

CP-5
67

1/30/24	Johany Miller	9737			
DATE	RECEIVED FROM	RECEIPT NUMBER	MISC. RECEIPTS	CLIENT ADV RECEIVED	

		6.0
TRUST FUNDS RECEIVED	FEES CHARGED	RE

LAW OFFICE OF JACK B. SWERLING
1720 MAIN STREET - SUITE 301
COLUMBIA, SOUTH CAROLINA 29201
PHONE: 803-765-2626

Paid in Full
\$35,000

RETAIN THIS RECEIPT
FOR YOUR RECORDS

Thank You

9737

DATE	RECEIVED FROM	RECEIPT NUMBER	MISC. RECEIPTS	CLIENT ADV RECEIVED	TRUST FUNDS RECEIVED	FEES CHARGED	FE RECI
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CP-6

LAW OFFICE OF JACK B. SWERLING
1720 MAIN STREET - SUITE 301
COLUMBIA, SOUTH CAROLINA 29201
PHONE: 803-765-2626

RETAIN THIS RECEIPT
FOR YOUR RECORDS

Thank You

9718

12/14/23	Johnny Miller	9720					
DATE	RECEIVED FROM	RECEIPT NUMBER	MISC. RECEIPTS	CLIENT ADV RECEIVED	TRUST FUNDS RECEIVED	FEES CHARGED	FE RECI

LAW OFFICE OF JACK B. SWERLING
1720 MAIN STREET - SUITE 301
COLUMBIA, SOUTH CAROLINA 29201
PHONE: 803-765-2626

balance - \$9,000.00

RETAIN THIS RECEIPT
FOR YOUR RECORDS

Thank You

9720

12/21/23	Johnny Miller	9726					
DATE	RECEIVED FROM	RECEIPT NUMBER	MISC. RECEIPTS	CLIENT ADV RECEIVED	TRUST FUNDS RECEIVED	FEES CHARGED	FE RECI

LAW OFFICE OF JACK B. SWERLING
1720 MAIN STREET - SUITE 301
COLUMBIA, SOUTH CAROLINA 29201
PHONE: 803-765-2626

RETAIN THIS RECEIPT
FOR YOUR RECORDS

Thank You

9726

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CRIMINAL RETAINER AGREEMENT

I, Johnny Miller, HEREBY RETAIN AND EMPLOY THE LAW OFFICES OF JACK B. SWERLING, TO REPRESENT myself, IN THE DEFENSE OF CRIMINAL CHARGES IN York COUNTY WHICH AROSE ON OR ABOUT August 2023, AND I AGREE TO PAY THE LAW OFFICES OF JACK B. SWERLING, FOR SERVICES TO BE RENDERED, PURSUANT TO THIS RETAINER AND EMPLOYMENT AGREEMENT, THE SUM OF: \$35,000.00. SAID PAYMENTS SHALL BE MADE ACCORDING TO THE FOLLOWING SCHEDULE: \$19,000 today, \$16,000 by 1/30/24

SAID PAYMENT IS SUBJECT TO THE FOLLOWING CONDITIONS: Appeal to Circuit Court + Only

THE FOLLOWING CONDITIONS ALSO APPLY TO THIS RETAINER AGREEMENT:

1. IN ADDITION TO THE LEGAL FEE, I AGREE TO BE RESPONSIBLE FOR PAYING IN ADVANCE EXPENSES RELATED TO THE FOLLOWING WHICH MAY HAVE TO BE INCURRED ON MY BEHALF INCLUDING BUT NOT LIMITED TO: PRIVATE INVESTIGATORS, INTERPRETERS, COURT TRANSCRIPTS, FILING FEES, EXPUNGEMENTS, EXPERT WITNESSES, AND ANY OTHER FEES PAID TO A THIRD PARTY.
2. I UNDERSTAND THAT ANY APPEAL OR REPRESENTATION FOR A RETRIAL OF THIS CASE IS NOT COVERED BY THIS FEE AGREEMENT AND THE FEES FOR OR COST THEREOF WILL BE BY SEPARATE AGREEMENT ENTERED INTO BETWEEN THE PARTIES SHOULD AN APPEAL OR RETRIAL OF THE CASE BE NECESSARY.
3. I UNDERSTAND AND AGREE THAT ALL CASH TRANSACTIONS IN EXCESS OF TEN THOUSAND (\$10,000) DOLLARS WILL BE REPORTED SEPARATELY TO THE INTERNAL REVENUE SERVICE AS REQUIRED BY LAW.
4. IT IS UNDERSTOOD THAT THE FEE AGREED ON IS SET IN ADVANCE AND WILL NOT BE HELD IN ESCROW, AND IS CONSIDERED EARNED WHEN PAYMENT IS MADE. THE FEE IS NOT BASED ON ANY HOURLY RATE. I UNDERSTAND THAT I WILL NOT RECEIVE OR BE

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ENTITLED TO AN ITEMIZED STATEMENT OF SERVICES. I UNDERSTAND THAT I HAVE THE RIGHT TO TERMINATE THE LAWYER-CLIENT RELATIONSHIP AND DISCHARGE THE LAWYER. IN THE EVENT THAT THE LAW FIRM'S SERVICES ARE TERMINATED FOR ANY REASON, I MAY BE ENTITLED TO A REFUND OF ALL OR A PORTION OF THE FEE IF THE AGREED UPON LEGAL SERVICES ARE NOT PROVIDED. I UNDERSTAND THAT BY ACCEPTING THIS EMPLOYMENT, THE LAW FIRM MAY BE FOREGOING OTHER POTENTIAL EMPLOYMENT.

5. IN THE EVENT THAT I FAIL TO MAKE ANY OF THE PAYMENTS AS SPECIFIED ABOVE, I AGREE TO ALLOW THE LAW FIRM TO WITHDRAW FROM THE CASE, AND I FURTHER AGREE TO SIGN ALL DOCUMENTS NECESSARY TO EFFECTUATE SUCH WITHDRAWAL.
6. THE LAW FIRM HAS MADE NO WARRANTIES OR PROMISES AS TO A PARTICULAR OUTCOME OF THIS CASE, BUT WILL USE ITS BEST PROFESSIONAL SKILLS AND ABILITIES IN MY BEHALF.
7. PURSUANT TO RULE 1.5, RPC, RULE 407, SCACR, THE FIRM WILL RETAIN YOUR FILE FOR A MINIMUM OF SIX (6) YEARS, UNLESS WE ARE MADE AWARE OF LEGAL PROCEEDINGS STILL PENDING OR TO BE INITIATED THAT RELATE TO THIS MATTER.

12/12/23
DATE

John E. Miller
CLIENT

I HEREBY ACCEPT THE ABOVE CASE AND AGREE TO USE MY BEST PROFESSIONAL SKILLS AND ABILITIES.

[Signature]
JACK B. SWERLING, FOR THE FIRM

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EXHIBIT CP-C



THE SUPREME COURT OF SOUTH CAROLINA
OFFICE OF DISCIPLINARY COUNSEL

COMPLAINANT:

Johnny E. Miller
1829 Paces River Ave. Apt. 106
Rock Hill, SC 29732
(803) 517-0378
johnnymillerjohn@aol.com

NAME OF ATTORNEY BEING COMPLAINED AGAINST:

Jack B. Swerling, Esq.
1720 Main St. Suite 301
Columbia, SC 29201
(803) 765-2626 Office
(803) 237-6300 Mobile

TYPE OF CASE:

Criminal

I, the Complainant, hired Attorney Swerling to represent me concerning a harassment 2nd degree charge filed against me by The Rock Hill Police Department. My ex-wife (Jacqueline Miller), after forty-two (42) years of marriage, was the Plaintiff. She also works for The Rock Hill Police Department. I assert the charge was bogus and harassment in itself against me by my said ex-wife after a very recent bitter divorce, and retaliation by the Rock Hill Police Department for me filing a complaint against it due to the Rock Hill Police aiding and abetting their co-worker, Jacqueline Miller, in her bogus and illegal actions. The Court processing the charge and case was The Rock Hill Municipal Court, initially presided over by Judge Anthony Triano and Judge Peter Lenzi (now deceased). My bond hearing on the harassment charge was presided over by Judge Triano. Further proceedings of the case were presided over by Judge Lenzi, Judge Jane Modla and Judge Tea Hoffman. Judge Lenzi was the primary Judge overseeing the case. Judge Triano and Judge Lenzi wrongfully sent me to jail for obeying the law in regards to legal proceedings due to the said harassment charge. There is only one harassment charge. Judge Triano sent me to jail for violating a "no contact" order for sending my wife court documents required by law. My wife and I were both *pro se* litigants at the time I

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sent her the said court documents. Judge Lenzi sent me to jail again for "contempt of court"....again for sending my wife court documents required by law. My wife and I both were still *pro se* litigants at that time also when I sent her these other court documents. All the documents I sent my ex-wife were related to the case in Family Court due to the divorce, and to reiterate, were required by law. Additionally, I was sent to jail wrongfully again by Family Court Judge Karen Roper for refusing to sign a fraudulent real-estate contract produced by my ex-wife to sale our marital home against my wishes. **Please see the "Arrest Log" for all four (4) of these arrests immediately attached to this complaint before the exhibits.**

I, the Complainant, hired Attorney Swerling on December 12, 2023 and paid him \$35,000.00 (thirty-five thousand dollars) in-full to represent me in this matter (see Exhibit A).

SPECIFICS AND ALLEGED MISCONDUCT ON WHICH THE COMPLAINT IS BASED

All the Plaintiff is seeking in this matter is a return of the \$35,000.00 (thirty-five thousand dollars) I paid Attorney Swerling. I have asked him several times to return the money, but he refuses.

Within a week or two after hiring Attorney Swerling, I became suspicious that he was not properly representing me and fighting for me to be exonerated of the harassment charge. I became suspicious because all the evidence that I gave him, he seemed pretty much to ignore. This is especially true with a letter that Attorney Swerling sent to me from Solicitor Shealy in which Solicitor Shealy intentionally lied and implied that I was charged with two (2) contempt-of-courts by The Rock Hill Municipal Court. This was a blatant lie by Solicitor Shealy, and I wrote a response affidavit to Solicitor Shealy's said letter, but Attorney Swerling ignored all of it, and refused to have it filed in the record (see Exhibit B).

After about a year and a half representing me, Attorney Swerling filed a motion with the Court to be relieved as my counsel (see Exhibit C). I strongly objected for Attorney Swerling to be relieved as my counsel because that would leave me without an attorney going into a jury trial (see Exhibit C again), but Judge Hoffman granted the motion for him to be relieved in a hearing on **May 29, 2025 (see Exhibit D)**, and set the date for a jury trial in the same said hearing for the harassment charge which was scheduled and held 3½ (three and a half) months later on **September 10, 2025** after I was originally arrested on the said harassment charge on **April 23, 2023 (see Arrest Log)**. Nearly two years and a half after I was arrested on the said charge, my case finally went to trial on September 10, 2025. I asked for a jury trial immediately when I was initially arrested, and a jury trial date was set for January 17, 2024, but when Attorney Swerling became my attorney in December of 2023 (see Exhibit A again), he refused to take make case to trial, and instead cut a bogus corrupt deal with Solicitor Shealy to nol-pros the case for 18 months (see Exhibit B again and Exhibit E), so the opposition would have more time to harass me, and attempt to set me up before restoring the charges, which is exactly

what they did. Yet, the documentation he sent me dated January 22, 2024 in **Exhibit F** states that I was NOT GUILTY. This NOT GUILTY document was sent to me by Attorney Swerling 20 (twenty) months before the jury trial on September 10, 2025 wherein a jury found me NOT GUILTY.

The State of South Carolina via The Rock Hill Municipal Court had over two (2) years to prepare for trial....I only had 3½ months. I made a motion for continuance for the jury trial with the Court to give me time to find another attorney in the same said hearing where Attorney Swerling was relieved from representing me, but Judge Hoffman denied the motion. Although I attempted diligently to find another attorney to represent me before the jury trial in 3½ months, I was unsuccessful. I had to represent myself *pro se* in the jury trial on **September 10, 2025** and was found **NOT GUILTY (see Exhibit G)**. The prosecutor for The State of South Carolina at the said harassment jury trial was the Assistant Solicitor for the sixteenth circuit, Attorney Hannah Woods. The harassment charge was obviously bogus from the very beginning, and Attorney Swerling did absolutely nothing to properly defend me against the charge. To the contrary, I believe strong evidence exists that he was in cahoots with the City of Rock Hill to find me guilty of the charge, and to get me fired from my job as a sixth-grade science teacher at Piedmont Middle School in Charlotte, NC (**see Exhibit H**). Attorney Swerling was successful in helping get me terminated from my job as a school teacher after having taught at Piedmont for over ten (ten) plus years, but thank God he was unsuccessful in getting me found guilty of harassment.

In **Exhibit H**, evidence is presented wherein Attorney Swerling sent a document to my place of employment at the time (Charlotte Mecklenburg Schools) with incorrect dates on them. This evidence was presented to Judge Hoffman at the hearing for Attorney Swerling to be relieved as my counsel. The incorrect and falsified document is dated January 30, 2024. I immediately notified Attorney Swerling about the document having the wrong dates, and he corrected and resent the document the next day....January 31, 2024. The remarkable thing about this incidence is that I had repeatedly instructed Attorney Swerling NOT to send anything to anyone on my behalf (especially my employer) except he send it to me first to be approved and proofread. Attorney Swerling repeatedly violated my instructions to him in this regard, and this is only one example of the many times he did this. Had I not caught the dates being wrong, the evidence would have appeared as if I had lied to my employer. I believe beyond any doubt that Attorney Swerling did this intentionally as part of the ploy to get me fired. On another occasion while representing me, he filed an appeal on my behalf that I had expressly instructed him NOT to file. He did this in an attempt to prolong my judicial process because anyone familiar with the judicial process knows that it takes forever for appeals to go through The System. The System's intent is to bleed me dry financially where I can't afford to hire legal representation and to financially ruin me. It is my belief that Attorney Swerling is a willing participant with The System in this regard.

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Exhibits I through T are email correspondence between Attorney Swerling and I and court officials that convey the spirit in which Attorney Swerling represented me. I believe the emails clearly indicate, along with the entirety of this complaint, that Attorney Swerling's representation of me **was not** genuine, honest, professional, nor worthy of \$35,000.00 (thirty-five thousand dollars). For the most part, the emails are in chronological order.

A brief description of **Exhibits A through T** are as follows:

Exhibit A....The retainer contract where I hired Attorney Swerling, and a "paid in full" receipt for the \$35,000.00.

Exhibit B....Letter from Solicitor Shealy wherein he lied, and an email from Attorney Swerling wherein he says he will not file my response affidavit with the court. This is evidence that Attorney Swerling ignored this tremendous piece of evidence.

Exhibit C....Attorney Swerling's motion to be relieved of being my attorney.

Exhibit D....Order granting Attorney Swerling relief from being my attorney, and my response motion objecting to it.

Exhibit E....Documentation of my initial appearance in court on the harassment charge before Judge Jane Modla on May 18, 2023, and proof of the initial jury trial date for January 17, 2024.

Exhibit F....NOT GUILTY and nol-pros documentation from January 22, 2024.

Exhibit G....NOT GUILTY documentation from jury trial on September 10, 2025.

Exhibit H....Documents that Attorney Swerling sent to my employer at the time (Charlotte Mecklenburg Schools) with the wrong dates on them.

Exhibit I....An email to Judge Modla (one of the presiding judges in the Rock Hill Municipal Court wherein I was charged with the said harassment_2nd degree charge) stating that Attorney Swerling refuses to file the court documents I instructed him to file.

Exhibit J....An email from Attorney Swerling preposterously asking me whether I want to appeal the granted motion to restore the harassment charges after being nol-prossed for 18 months, or go to trial by jury? The reason this is preposterous is because I had been pleading for a jury trial from the very beginning....two years earlier (see **Exhibit D again**). Why would he ask such an insane question? I never wanted or asked for an appeal. Attorney Swerling wanted the appeal himself to prolong the process in a plot with the opposition to bleed me out, and destroy me financially after having gotten me fired from my job.

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Exhibit K....An email from Ms. Shantay Greer on the behalf of the Rock Hill Municipal Court's Clerk of Court (Shelley Channell) stating that even though Attorney Swerling refuses to file documents on my behalf in the said harassment case, the Court will not accept documents from me to be filed as long as Attorney Swerling represents me.

Exhibit L....My response email to Ms. Greer's email presented as Exhibit J above.

Exhibit M....A terse email exchange between Attorney Swerling and I about his representation of me. Attorney Swerling says here that he will not "withdraw" from representing me regardless of our disagreements because he's not that kind of guy, and that he will represent me through a jury trial.

Exhibit N.... More terse email exchanges concerning Attorney Swerling's representation of me.

Exhibit O.... More terse email exchanges concerning Attorney Swerling's representation of me.

Exhibit P....Email notice that Attorney Swerling is quitting (see Exhibit C also).

Exhibit Q....Emails from Attorney Swerling about me signing a consent form to relieve him from being my attorney.

Exhibit R...Emails between Attorney Swerling and I about returning my \$35,000.00 (thirty-five thousand dollars).

Exhibit S.... More terse email exchanges concerning Attorney Swerling's representation of me.

Exhibit T....Terse emails between Attorney Swerling and I wherein he states that he doesn't take serious my claims of the perilous plight of black men living in the United States of America.

Of course, I believe what Attorney Swerling has done as presented in this complaint is wrong and unethical. However, I have no ill feelings nor animosity in my heart towards him. I know he had a lot going on in his personal life while representing me, and he's certainly not a young anymore. I'm sure he has a lot of pressure on him. We are all human. As an authentic Christian by God's grace, I forgive Attorney Swerling for everything, and I love him. In spite of all this, we had some good conversations in his office during the time he represented me....not about my legal matters....but about life. I simply want my money back. I am not a rich man who can afford to give away \$35,000.00 for nothing.

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For the reasons listed herein, and in the exhibits, I ask that that this Great Counsel order Attorney Swerling to return me \$35,000.00 (thirty-five thousand dollars). I am only asking for what I paid him to do absolutely nothing. To the contrary, if I was to ask that justice truly be served, I would ask for much more than what I paid him, considering all of the harm he has intentionally caused me.

Truthfully, sincerely, and humbly submitted,

Johnny E. Miller

Johnny E. Miller

November 3, 2025

ARREST LOG FOR JOHNNY E. MILLER

THE CITY OF ROCK HILL AND YORK COUNTY FAMILY COURT_SOUTH CAROLINA

ARRESTS	DATE	PLACE	CHARGE	TERMS OF RELEASE	ARRESTING AGENT	CASE #
Arrest # 1	4/23/2023	Defendant's Residence	Harassment-2 nd Degree	Cash Bond \$465.00 Served 2 days incarcerated	Officer Higgins of Rock Hill Police Department	2023-A-46203-00966
Arrest # 2	6/9/2023	Rock Hill, SC Municipal Court	Bond Revocation For Violating "No Contact" Order from Harassment-2 nd Degree Charge	Served 19 days incarcerated released on Time Served with Attorney Leland Greeley representing me	Judge Anthony Trianao of Rock Hill Municipal Court	2023-A-46203-00966
Arrest # 3	8/10/2023	Family Court Rock Hill, SC	Contempt Of Court For Refusing To Sign Fraudulent Real Estate Contract	Served 4 days incarcerated released upon signing fraudulent contract	Judge Karen Roper of York County Family Court	2021-DR-46-1461
Arrest # 4	11/13/2023	Rock Hill, SC Municipal Court	Contempt Of Court For Sending Ex-Wife Court Documents That Were Required By Law As Both Of Us Were Pro-Se Litigants	Served 15 days incarcerated released on Time Served	Judge Peter Lenzi of Rock Hill Municipal Court	2023-A-46203-00966

The initial charge of harassment was said to be "**dropped**" via Jack Swerling which means there is no legal grounds for a contempt of court because there was not a legitimate charge from the beginning. All of the charges were derived from bogus fraudulent allegations based upon my ex-wife's lies while we were going through a bitter divorce after being married 42 years. My ex-wife (Jacqueline "Ms. Jackie" Miller) works for the Rock Hill Police Department and formerly worked in Rock Hill City Management where she had an affair with her boss. She has been employed by the City of Rock Hill for over 25 years. I spent a total of 40 days in jail for doing absolutely nothing but obeying the law and being a good citizen because of my ex-wife's lies, corrupt judicial officials, and corrupt police officers. All of the main corrupt parties involved (with the exception of Judge Roper) are Caucasian and employees for the City of Rock Hill...namely **Chief Chris Watts, Municipal Judge Peter Lenzi, and Assistant City Solicitor Ben Shealey.** Judge Roper is also corrupt and Caucasian, but she is not an employee of the City of Rock Hill. The City of Rock Hill is attempting to destroy me to cover their own evil crimes and sins.

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EXHIBIT

CP-D

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STATE OF SOUTH CAROLINA

COUNTY OF YORK

CP-18

2025OR4610300055
CIVIL CASE NUMBER

IN THE MAGISTRATE'S COURT

SUMMONS
(RESTRAINING ORDER)
(Harassment and Stalking)

Jacqueline Miller

PLAINTIFF(S)

VS.

Johnny Earl Miller
1829 Paces River Ave # 106
Rock Hill, SC 29732

DEFENDANT(S)

DEFENDANT COPY

TO: Johnny Miller :

The above named Plaintiff having filed a Petition for Restraining Order, copy attached:

YOU ARE HEREBY SUMMONED TO APPEAR before the:

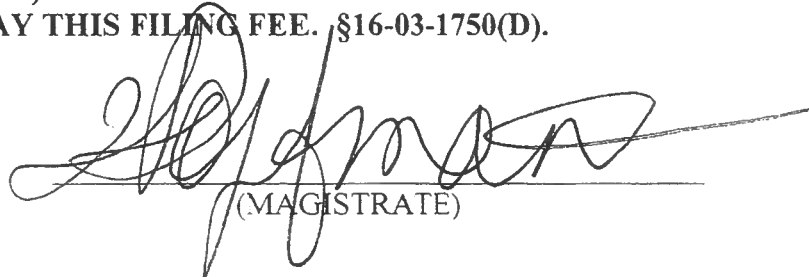
Catawba/Ebenezer Magistrate
1070 Heckle Blvd., Suite 2100
Rock Hill, SC

on **July 23, 2025** at **3:30 PM** to show cause why the Restraining Order prayed for by the Petitioner should not be granted.

IF YOU FAIL TO APPEAR, the relief prayed for by the Plaintiff may be granted.

NOTICE: THE NON-PREVAILING PARTY IN THIS ACTION IS ASSESSED A FILING FEE OF FIFTY-FIVE DOLLARS (\$55.00). THE COURT MAY HOLD A PERSON IN CONTEMPT OF COURT FOR FAILURE TO PAY THIS FILING FEE. §16-03-1750(D).

June 24, 2025


(MAGISTRATE)

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STATE OF SOUTH CAROLINA)

COUNTY OF York)

IN THE MAGISTRATES COURT

Jacqueline Miller)

PLAINTIFF(S))

VS)

Johnny Earl Miller)

DEFENDANT(S))

COMPLAINT AND MOTION
FOR RESTRAINING ORDER
(Harassment and Stalking)

SC25CR461030055
CIVIL CASE NUMBER

The Plaintiff alleges:

- 1 The Plaintiff lives in York County
- 2 The Defendant lives at 1824 Paces River Trc #106 which is in Rock Hill, SC 29732
- 3 The Harassment First or Second Degree or Stalking occurred in January 2023

- 4 Plaintiff further alleges that the following conduct occurred by the defendant on the times, dates, and places listed below, and such conduct falls within the definition of:
☐ HARASSMENT, FIRST DEGREE (§16-3-1700 (A)), or
☐ HARASSMENT, SECOND DEGREE (§16-3-1700 (B)), or
☒ STALKING (§16-3-1700 (C)).

① June 4, 2025, at 1:30 O'clock, A.M. PM (circle one), at 150 Black Street, RH Police Dept which is in Rock Hill, SC, the conduct complained of occurred when the defendant:

- Convinced her job to file a false Police Report
- Convinced her job to pick up a copy of a false Police Report.

② On June 24, 2025, at 1:00 O'clock, A.M. PM (circle one), at Black Street, RH Police Dept which is in Rock Hill, SC, the conduct complained of occurred when the defendant:

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On June 24, 2025, at 1:00 O'clock, A.M./P.M. (circle one) at Black St. Rock Hill Police Dept., which is in Rock Hill, SC, the conduct complained of occurred when the defendant:

Came to my job insisting that he pick up a copy of the sealed police report that was false and unfounded.

(State details of harassment/stalking and other facts and circumstances upon which relief is sought above. Attach additional sheets if necessary.)

6 Plaintiff requests: (Check one or more)

- ☐ a. That the defendant be enjoined from abusing, threatening to abuse, or molesting the plaintiff or members of the plaintiff's family
- ☒ b. That the defendant be enjoined from entering or attempting to enter the plaintiff's place of residence, employment, education, or other location.
- ☒ c. That the defendant be enjoined from communicating or attempting to communicate with the plaintiff in a way that would violate Article 17, Chapter 16 of the 1976 South Carolina Code of Laws, as amended.

SWORN to and Subscribed before me

This 24th day of June, 2025

[Signature]
Notary Public for South Carolina

My Commission expires 3-15-28

[Signature]
Signature of Plaintiff or Person Filing
on Behalf of Plaintiff

NOTICE: THE NON-PREVAILING PARTY IN THIS ACTION IS ASSESSED A FILING FEE OF FIFTY-FIVE DOLLARS (\$55.00). THE COURT MAY HOLD A PERSON IN CONTEMPT OF COURT FOR FAILURE TO PAY THIS FILING FEE. §16-03-170(D).

NOTICE TO DEFENDANT: YOU HAVE THE RIGHT TO EMPLOY COUNSEL TO REPRESENT YOU.

STATE OF SOUTH CAROLINA
COUNTY OF YORK

State of South Carolina,

v.

JOHNNY E. MILLER,

Defendant.

IN THE MUNICIPAL COURT
CITY OF ROCKHILL

CASE NO.2023A4620300966

**MOTION TO BE RELIEVED
AS COUNSEL**

8u
CP-21
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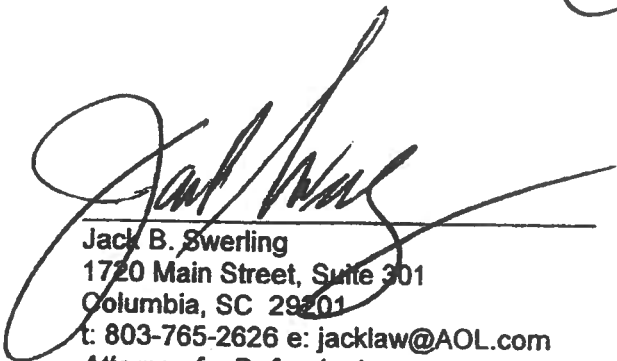
**TO: THE HONORABLE JANE P. MODLA, THE HONORABLE TEA HOFFMAN,
BENJAMIN SHEALY, CITY PROSECUTOR HANNAH WOODS, AND THE
DEFENDANT, JOHNNY E. MILLER**

Jack B. Swerling requests a hearing be scheduled in the City of Rock Hill Municipal Court so that he can be heard as to why he seeks withdrawal as counsel for the above-named defendant. Counsel has been representing the defendant since November–December 2023.

The attorney-client relationship between counsel and the defendant has deteriorated to such an extent that continued representation is impossible. The defendant, without a shred of evidence, has accused counsel of being in some imagined conspiracy with law enforcement, personnel at the City of Rock Hill Municipal Court, and the defendant's ex-wife to work against him. The defendant has even gone so far as accusing counsel of being paid off to work against him, as well as attacking counsel by calling counsel a crook and dishonest. The defendant shares his libelous and slanderous vitriol with numerous people and news media copied on emails between himself and counsel, despite counsel's admonition that copying many of the people copied is not in his best interests.

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Jack B. Swerling
1720 Main Street, Suite 301
Columbia, SC 29201
t: 803-765-2626 e: jacklaw@AOL.com
Attorney for Defendant

May 20, 2025
Columbia, South Carolina

STATE OF SOUTH CAROLINA)
)
COUNTY OF YORK)
)
PLAINTIFF,)
)
vs.)
)
)
JOHNNY E. MILLER)
)
)
DEFENDANT.)

IN THE MUNICIPAL COURT
CITY OF ROCK HILL

CASE NO. 2023A4620300966

ORDER TO BE RELIEVED AS
COUNSEL

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Jack B. Swerling, Esquire, filed a Motion to Be Relieved as Counsel on May 20, 2025.

Judge Telisha K. Hoffmann, presided over a hearing on this Motion on May 29, 2025.

Testimony was presented by the Plaintiff contending that the relationship between lawyer and client was irreconcilable and that cooperation by the Defendant in this case had broken down.

The Defendant testified, and provided evidence, that as early as January 2024, he had disagreements with his attorney on how the case should proceed. The Defendant acknowledged that he failed to cooperate with the Plaintiff when asked to meet with him at his office as he feared for his life. However, the Defendant provided no evidence to support this claim. The Defendant's communicated his primary reason for wanting the Plaintiff to continue was his inability to afford another attorney.

After hearing all the testimony and reviewing the evidence in this matter, the Court finds that the attorney-client relationship has deteriorated to such an extent that it is irreparable and further that the Defendant will not be harmed by his attorney being relieved of counsel at this time given that a trial date cannot be set prior to September 2025.

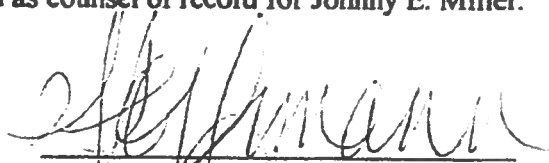
THEREFORE, IT IS ORDERED that:

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Attorney Jack Swerling is relieved as counsel of record for Johnny E. Miller.

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AND IT IS SO ORDERED

A handwritten signature in black ink, appearing to read 'Telisha K. Hoffmann', written over a horizontal line.

The Honorable Telisha K. Hoffmann
Magistrate Court Judge
Rock Hill, South Carolina

STATE OF SOUTH CAROLINA
COUNTY OF YORK

City of Rock Hill
Plaintiff

Vs.

Johnny Earl Miller
Defendant

IN THE MUNICIPAL COURT
FOR THE CITY OF ROCK HILL

Motion For Reconsideration

Case No. 2023-A-46203-00966

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I, Johnny E. Miller, the Defendant in this matter, hereby move this Most Honorable Court to reconsider its Order stamped filed June 10, 2025 generated from a hearing that was held on May 29, 2025 before The Honorable Judge Hoffman. The Defendant moves for reconsideration for the following reasons:

- 1) In the honorable court's finding that the Defendant did not provide evidence to support the claim that he feared for his life as to the reason he did not meet with Attorney Swerling privately in his office, the Court seems not to comprehend the magnitude of the escalated cases of racism and murder against a black man living in America by the Judicial System. Remember George Floyd and others. The record will show that the Defendant agreed to meet with Attorney Swerling in a neutral location, but not in the attorney's private office. It seems even more so that the honorable court does not comprehend the magnitude of the overwhelming amount of evidence already on record in this matter of the utter corruption of high ranking judicial officials (judges) and law enforcement officials in cahoots with Attorney Swerling pertaining to the Defendant being falsely incarcerated for 40 days, his home being illegally taken from him, and him being fired from his job

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with Charlotte Mecklenburg Schools after retaining Attorney Swerling to represent him for \$35,000.00 on a 100% bogus harassment charge brought against the Defendant by his ex-wife who works for the same law enforcement agency who is responsible for falsely incarcerating the Defendant (The City of Rock Hill). The Defendant produced documentation at the May 29th hearing before Judge Hoffman as evidence that Attorney Swerling was in cahoots with The City of Rock Hill and Charlotte Mecklenburg Schools to get the Defendant fired from his job to financially ruin him, putting him in a position of not being able to pay for further legal representation after paying Attorney Swerling \$35,000.00 to do more good for the Defendant's opposition in this matter than for the Defendant himself, whom Attorney Swerling was supposed to be representing. Attorney Swerling has been a detriment to the Defendant ever since he was retained as counsel. The Defendant has much more evidence of Attorney Swerling being in cahoots with The City of Rock and Charlotte Mecklenburg Schools, but the honorable court rushed things along in the hearing, not providing the Defendant the time to present all of his evidence concerning the matter. Furthermore, this honorable court seems to fail to comprehend the gravity of the facts that Attorney Swerling's sterling career is called into question by the hard facts presented by the Defendant. If the Defendant's accusations against Attorney Swerling are true (which God knows they are) and taken seriously by judicial officials, then this powerful lawyer's reputation and means of making a living could be harmed and in jeopardy. Furthermore, it is clear that the Defendant's life DOES NOT MATTER and means absolutely nothing to judicial and law enforcement officials in York County, SC. Any rational person can clearly see this by looking at the record in this matter. The judicial system and law enforcement officials of York County,

SC are attempting to destroy the Defendant, using Attorney Swerling as one tool, because the Defendant sent legal documents to his ex-wife that he was required to send her by law as they were both pro se litigants going through a bitter divorce and fighting over the marital home. If what the Defendant is claiming in this case is true (and God knows it is) and it is taken seriously by the powers that be, then all of these judges and law enforcement officials' careers could be tarnished and/or jeopardized. These agencies are entitled to carry guns by law, and are given very broad latitude to shoot a black man for various reasons. This court fails to see that these facts among others more that qualify as viable evidence to support that any black man in his right mind would legitimately refuse to meet with a crooked high powerful attorney in his private office for fear for his life given the circumstances that the Defendant is presently in.

- 2) Attorney Swerling submitted into evidence to the Court in the May 29th hearing a list of 15 judges. All 15 of these judges have been involved in rulings in this matter. Of the 15 judges, only 2 made rulings completely in the Defendant's favor, another one partially in his favor. The other 12 all ruled against the Defendant....many outrageously so....including Judge Jane Modla of the Rock Hill Municipal Court whose most recent outrageous ruling prolonged this fiasco by restoring the bogus charges which were said by Attorney Swerling to have been dismissed. To reiterate, this matter is an absolute waste of taxpayers' money. This list of judges was emailed out by the Defendant. The only reason that Attorney Swerling submitted this list of judges to this honorable court was to express to the court how many high judicial officials were involved in this corruption. Attorney Swerling was letting this court know that any ruling you make in favor of the Defendant,

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even if it's the right and legal judgment of the law, will be going against 12 of your colleagues. If you go against your colleagues, you will probably be jeopardizing your career and/or possible future promotions. There is no other legitimate reason for Attorney Swerling to submit this list of 15 judges to this court.

- 3) To the Defendant as a black man living in the United States of America who has been falsely imprisoned for 40 days for obeying the law, fired from his job as a school teacher for being bogusly arrested and imprisoned on charges filed by his ex-wife and her employer (The Rock Hill Police Department), had his home stolen from him by corrupt judicial officials, and having his name maligned by having his bogus arrest mugshot smeared all over the internet....the only rational conclusion for this court's ruling is that 1) it has decided to participate in the corruption with the 12 other colleagues...or 2) it is totally disconnected to the plight of black men in America and their history with the judicial system.

For these and other reasons, the Defendant asks that this honorable court reconsider its order to relieve Attorney Swerling as my counsel and order him to represent me until this case is disposed of....or....order him to return my \$35,000.00, because he has done absolutely nothing positive for me in this matter. To the contrary, Attorney Swerling has worked for the opposition.

If this honorable court does not reconsider its order, then this entire case will continue to go exactly like the corrupted officials planned it. Buy the Defendant's lawyer, have the bought lawyer charge the Defendant an outrageous amount for representation (\$35,000.00) for representation on a bogus harassment charge,

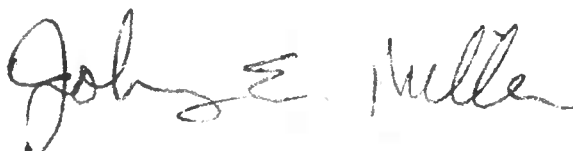
CP-29

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falsely imprison the Defendant, fire him from his job, take his home, financially destroy him, and rule against him in court no matter what the evidence shows.

Modern day slavery, and simply outrageous.

Sincerely, truthfully, and humbly submitted,

A handwritten signature in cursive script that reads "Johnny E. Miller". The signature is written in dark ink and is positioned above the printed name.

Johnny E. Miller

June 12, 2025

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EXHIBIT

CP-E

STATE OF SOUTH CAROLINA

COUNTY OF YORK

CP-31
2023OR4610300080
CIVIL CASE NUMBER

ORDER OF
DISPOSITION

93

Jacqueline Miller

PLAINTIFF(S)

Vs

Johnny Earl Miller
1829 Paces River Ave
#106
Rock Hill, SC 29732

DEFENDANT(S)

IT IS ORDERED that the above referenced civil case shall reflect a disposition of:

- ☐ Settled
- ☒ Dismissed
- ☐ Default Judgment
- ☐ Find for the Plaintiff for Summons and Complaint (Transcript of Judgment will be issued ten (10) days from the court date.)
- ☐ Find for the Plaintiff for Claim and Delivery (Pick Up Order issued the day of court.)
- ☐ Find for Defendant
- ☐ Transferred to another Court

On, the party parties to this action presented testimony and arguments. Based on the above information and findings of fact, an award was made to the Plaintiff Defendant in the amount of \$ plus filing fees of \$, for a total of \$.

IT SO ORDERED

JUDGE

Catawba/Ebenezer Magistrate
1070 Heckle Blvd., Suite 2100
Rock Hill, SC 29732
Phone: (803) 909-7600
Fax: (803) 909-7606

June 20, 2023

STATE OF SOUTH CAROLINA

COUNTY OF YORK

94

Jacqueline Miller

PLAINTIFF(S)

VS.

Johnny Earl Miller
1829 Paces River Ave
#106
Rock Hill, SC 29732

DEFENDANT(S)

TO: Johnny Miller :

The above named Plaintiff having filed a Petition for Restraining Order, copy attached:

YOU ARE HEREBY SUMMONED TO APPEAR before the:

Catawba/Ebenezer Magistrate
1070 Heckle Blvd., Suite 2100
Rock Hill, SC

on June 20th, 2023 at 11:00 AM to show cause why the Restraining Order prayed for by the Petitioner should not be granted.

IF YOU FAIL TO APPEAR, the relief prayed for by the Plaintiff may be granted.

NOTICE: THE NON-PREVAILING PARTY IN THIS ACTION IS ASSESSED A FILING FEE OF FIFTY-FIVE DOLLARS (\$55.00). THE COURT MAY HOLD A PERSON IN CONTEMPT OF COURT FOR FAILURE TO PAY THIS FILING FEE. §16-03-1750(D).

May 31, 2023


(MAGISTRATE)

CP-32

2023OR4610300080
CIVIL CASE NUMBER

IN THE MAGISTRATE'S COURT

SUMMONS
(RESTRAINING ORDER)
(Harassment and Stalking)

COURT COPY

CP-33

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EXHIBIT

CP-F

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CP-34

AMAZINGLY CORRUPT

From: Johnny E. Miller (johnnymillerjohn@aol.com)

To: john.gettys@cityofrockhill.com; david.vehaun@cityofrockhill.com; ralph@warrennorman.com

Cc: tea.hoffmann@yorkcountygov.com; hannah.woods@scsolicitor16.org; jane.modla@cityofrockhill.com; chris@bencrump.com; jmrandall@comporium.net; tina.terry@wsoc-tv.com; adys@heraldonline.com; alexandra.davis@yorkcountygov.com; roland@rolandsmartin.com; benjamin.shealy@cityofrockhill.com; amonica.webb@yorkcountygov.com; athomas@lbgreeleylaw.com; awwweeks@comporium.net; cawlaw@comporium.net; josh@jbmitchelllaw.com; lgreeley@lbgreeleylaw.com; zm_paralegal@mlblaw.com; grace@jbswerling.com; darryl1963@icloud.com; shannon.smarr@yorkcountygov.com; srobinson@sharikamrobinsonlaw.com; shelley.channell@cityofrockhill.com; jacklaw@aol.com; jackswerling@gmail.com; carlos.culbreath@cityofrockhill.com; hugh.harrelson@cityofrockhill.com; jim.grayson@cityofrockhill.com; michael.belk@cityofrockhill.com; chris.watts@cityofrockhill.com; tommy@elrodpope.com; chris.hefner@cityofrockhill.com; crb@cityofrockhill.com; derrick.lindsay@cityofrockhill.com; brent.faulkenberry@cityofrockhill.com; kevin.sutton@cityofrockhill.com; john.black@cityofrockhill.com; perry.sutton@cityofrockhill.com; jim.reno@cityofrockhill.com; jennifer.colton@yorkcountygov.com; denyse.brewington@dpi.nc.gov; marchavis.caldwell82@gmail.com; randall.melissaj@gmail.com; melissanlaughs13@gmail.com; travisjackson126@gmail.com; kimjackson1899@gmail.com

Date: Thursday, August 7, 2025 at 04:26 PM EDT

Dear Dignitaries, Elected Officials, Judiciary Authorities, concerned Rock Hill Citizens, and others.....

I pray most is well. I just left the Catawba/Ebenezer Magistrate's Office to pickup a copy of the Restraining Order Hearing Transcript from Thursday July 24, 2025 over which Judge Jennifer Colton presided. The office clerk, I believe her name is Ms. Stinson, informed me that due to a "technical error" there is not a transcript of the hearing and never will be. I talked to an attorney about this and he said in his 30 plus years of practicing law, he's never heard of a hearing or trial transcript forever being unavailable due to a technical error. I wonder how many times that's happened in York County, SC?? Outrageously Corrupt!! It should be obvious to all by now that it's not possible for me to receive a just and fair trial or hearing in York County, SC.

However, by God's grace I'm not going to allow these evil people to push me to the brink of doing something illegal.....I know that's there goal. Tomorrow I will be filing a Motion To Dismiss and/or Revoke the Restraining Order with the Catawba/Ebenezer Magistrate's office, since there is no transcript from which I can appeal the decision to grant the bogus Restraining Order.

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Remember....the clean gets cleaner, and the dirty gets dirtier.

Isaiah 59:14-15 (KJV)

¹⁴And judgment is turned away backward, and justice standeth afar off: for truth is fallen in the street, and equity cannot enter. ¹⁵Yea, truth faileth; and he that departeth from evil maketh himself a prey: and the Lord saw it, and it displeased him that there was no judgment.

ABSOLUTELY AMAZING!!!!

Again, I love all of you and I forgive all those who oppose me and who are working to destroy me....a 100% innocent man of all these bogus, malicious, and insane allegations. I just want PEACE and for our community to come together in UNITY. For this to happen, our leaders must do right.

Your servant in Christ,
Johnny Miller

"Never Confuse the Will of the Majority with the Will of GOD"

On Wednesday, August 6, 2025 at 10:01:48 AM EDT, Johnny E. Miller <johnnymillerjohn@aol.com> wrote:

Greetings to all and much love.....

Please file attached a clocked stamped filed copy of the Rule 5 motion for discovery that I emailed to you yesterday. Thank you.

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EXHIBIT

CP-G

CP-37

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18 January 2024

Jack Swerling, Esquire
1720 Main Street, #301
Columbia, South Carolina 29201

Re: City of Rock Hill v. Johnny Miller
Warrant Number 2023-A-46203-00966 - Harassment

Dear Mr. Swerling:

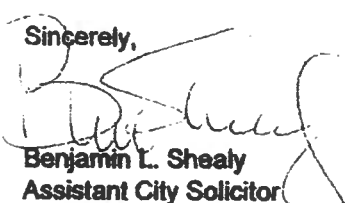
I am writing to inform you I am nolle prosequing with leave to restore for eighteen months the above case. The primary reason I chose this route is to ensure Mr. Miller has no contact with Ms. Miller during the next eighteen months. I believe the facts of the case meet all elements of the crime.

Since Mr. Miller was last held in contempt of court, he has not had any contact with Ms. Miller. That is Ms. Miller's primary objective. It is unfortunate it took two contempt of court findings to get Mr. Miller to understand he could not contact her. However, I did my utmost to get him to stop prior to filing any motions.

Should Mr. Miller contact Ms. Miller directly or through third parties during the eighteen-month period I will reopen the case. It is also my understanding he is spreading rumors to the community at large about Ms. Miller. Please ask him to stop doing so as it serves no purpose other than to escalate problems within their church community.

I spoke with Ms. Miller about celebrating the birthdays of the grandchildren with both being present. Ms. Miller told me, and I agree, that the decision in the matter is a decision for their children, not she and Mr. Miller. All decisions on those matters must be made by the parents of the grandchildren.

Sincerely,


Benjamin L. Shealy
Assistant City Solicitor
Cc: Jacqueline Miller

CITY OF ROCK HILL SOLICITOR'S OFFICE

201 E. MAIN STREET, 3RD FLOOR, ROCK HILL, SOUTH CAROLINA 29730
OFFICE 803/329-5619 FACSIMILE 803/326-3865

2/2/2024, 9:48

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CP-38

State of South Carolina)

In the Municipal Court of Rock Hill

County of York)

Warrant: 2023A4620300966

City of Rock Hill,)

TWO ORDERS

V.)

Johnny Earl Miller,)
Defendant)

This matter concerns two motions. The first, filed 9/19/2024, on behalf of the defendant to have the Court expunge the defendant's record. The second, filed 12/23/2024, on behalf of the city to restore the original charge to the docket.

Charge: Harassment 2nd degree (B) city charge
Warrant: 2023A4620300966
Date of Arrest: April 23, 2023
Arresting Officer: Detective Olson

Appearances:

For the City: Jackie Miller
Ben Shealy, City Solicitor

For the Defense: Johnny Miller
Jack Swerling, Defense Attorney

Proceedings:

On 2/11/2025 a hearing was held on both motions at the Rock Hill Municipal Court, Jane Pittman Modla, presiding Judge.

Motion #1 was filed by the Defense on 9/19/2024, to have the court order the expungement of defendant's record. Motion #2 was a motion to restore the original charge to the docket, filed by the city on 2/23/2024.

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For Motion #1, the defense argued that on 4/23/2023, the defendant was arrested and charged with Harassment against his ex-wife Jackie Miller. On 12/15/2023, the defendant requested a jury trial on the charge. On 1/18/2024, the Solicitor advised the defense that he was moving to Nolle Prose the charge with Right to Restore for 18 months.

The defense argued that pursuant to S.C. Code of Laws Section 17-22-950(A) the Court shall expunge the record and pursuant to Section (C) must do so no later than 30 days after the appeal expiration date. (Defendant Exhibit #1).

The defense also argued that the S.C. Court Administration issued the Courts a Memorandum regarding the Expungement Process (Defendant Exhibit #2) which mandated that immediately upon disposition of a dismissed or nolle prossed charge, the Court shall complete the expungement application process.

The defense also cited Mackey v. S.C., op. no. 25795 (S.C. 3/22/04) which holds that once a case is nolle prossed, the State must obtain a new indictment in order to prosecute the same charge, that when a "Solicitor enters a nolle prosequi, charges are extinguished and thus per the defense cannot be rejuvenated on the same warrant and should be expunged immediately. The defense further argued that there is no provision in the law that allows "nolle prose with leave to restore".

The City's response was that the case was not nolle prossed but was nolle prossed with the right to restore for 18 months pending certain conditions of no contact. So, the case was simply taken off the trial docket while the charge was conditionally nolle prossed for 18 months. If conditions were complied with then after 18 months the case would be expunged by the Court per the statute. The Solicitor also argued that that's the way it's always been done in this Court, that if he nolle prosses with the right to restore, it's a conditional nolle prose. So – in this particular case, the city is not at the stage where Section 17-22-950 applies. Furthermore, the city argued Mackey does not apply because the case was not nolle prossed. Had it been the city agreed the case could not be resurrected without a new warrant.

For Motion #2, the city stated that the defendant violated the nolle prosequere with the right to restore conditions by contacting the victim within the 18 month period and was thus seeking to restore the original charge to the Trial Docket. The city proffered the testimony of Jackie Miller, the alleged victim in this matter.

Witness #1: Jackie Miller testified that after the charge was first nolle prossed with right to restore, the defendant left her alone for a while but then around time school started, in September, she started receiving texts and emails from the defendant. Then at the granddaughter's ball games, she started seeing him as they both attended. One time he came over to the area where she was seated and asked if she still loved God. Did she still speak in tongues. Then called her crazy and told everyone she was crazy.

Another time, in December, her 93-year-old mother was being released from the hospital to a rehab center, Jackie came to get her own belongings and saw the defendant in the parking lot. He said to her, "you know you're under the judgment of God". She said words escalated between them and he started calling her 'whore' several times, loudly, in the parking lot. He said, "No one wants you but white men." She left to go see her mother at the nursing home. He came there. She told her mother that she was leaving because he was calling her names. He stated, "yes, Mrs. Brown, I called your daughter a whore because that is what she is." She said her brother had called him and told him not to come there because he was causing trouble.

On cross, she agreed the first incident had occurred 9 months after the case had been nolle prossed with right to restore. She said he came to her area at the ball game and began poking at her verbally. She agreed he never put a hand on her. He did not threaten her. He did not touch her physically. She agreed she did not like what he said to her but that he should not have said anything. She agreed he had the right to see his grandchildren. She also said she never denied him the right to see her mother, his ex-mother-in-law. To her knowledge, her mother did not ask him to visit or to leave. Although her brother had told him not to come over. The defense postulated that the brother had no authority to speak for her mother. She asserted he did have the right to protect their 93 year old frail mother.

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Witness #2: Johnny Miller, the defendant, testified that they have 3 daughters and 5 granddaughters. One is a cheerleader, and he tries to see all her games. He said he sits with his family. When he nolle prossed with right to restore the case I "proffered" this as my response – this is the only opportunity for my ex to continue to harass me. I knew she'd do this and trump up 100% bogus charges. Call me a prophet or just common sense. I have not harassed her. Never in my entire life. I have never initiated contact with her. Our family can testify on my behalf. Two days ago, we were at the hospital together. I visit her mother every day. I was asked to come get Mrs. Brown's belongings by her granddaughter Shantay because Jackie couldn't come. She was still in hospital when I got there. This is probably the day she is referring to. I got everything in her room. She approached me in the parking lot and snatched her belongings and flowers off the cart. I never approached her, and she stalks me. My church members can testify. Her own sister testified on my behalf. I try to ignore her because I know she has the authorities on her side. (Defendant's subsequent testimony was objectionable and stricken).

Exhibits for the Defense: #1 S.C. Code Section 17-22-910,950
#2 SC Court Administrative Memorandum
#3 Mackey v. St. of SC, op.no. 25795

Exhibits for the City: #1 Letter & Motion to Restore with 12 pages of Documentation

Both Motions taken under advisement.

Ruling as to Motion #1

A prosecutor has broad powers to prosecute or not a charge. It's a long-standing common law that a prosecutor can nolle prosequi with leave to restore a charge. The effect is to abandon prosecution for the time being and take the charge off the trial docket. It is not an adjudication. Thus, the expungement laws do not apply. The only question for this court is procedure. How long can the Solicitor abandon it and how does the Solicitor return it to the docket? This Court has always required "leave to restore" to have a deadline. If not restored by the deadline, then the Court automatically

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CP-42

expunges the charge. To be restored, the Court requires notice and hearing. In said case, 18 months is a reasonable deadline as the appearance bond is invalid after 18 months in summary courts. S.C. Code 17-15-20 (B).

The Mackey case does not apply. There are no indictments in summary court. The defense argues that the warrant would have to be reissued by the Solicitor to resurrect the original charge. A Solicitor does not issue arrest warrants. This theory would nullify his power to nolle prosequere with right to restore – a power that S.C. law does not prohibit.

The Defendant's Motion #1 is DENIED.

As to Motion #2

The City's nolle prosequere with right to restore 18 months was conditioned upon the defendant abiding by the no contact order issued as a condition of bond. The City's evidence shows probable cause to believe the no contact order has been violated. **

The City's Motion #2 is GRANTED and the original charge of Harassment 2nd Degree, warrant 2023A4620300996 is restored to the Jury Trial docket and is scheduled to be tried March 11, 2025, at 9:00 a.m.

IT IS SO ORDERED.

Jane Pittman Modla, Judge
Rock Hill Municipal Court

**For the defendant's edification, the court has no jurisdiction over the victim, only the defendant. If the defendant chooses to go where she is, he risks the consequences of "contact". If she approaches him, the proper response would be to walk away, but never "respond" or talk to her.

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Attachments:

1. Motion #1
2. Motion #2
3. Arrest Warrant
4. Bond Papers
5. No Contact Order
6. 4 Exhibits

**The recording of the hearing is available upon request, which can be made in writing to Shelley Channell, Clerk of Court at

Shelley.Channell@cityoffranklin.com

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EXHIBIT

CP-H

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AFFIDAVIT AND RESPONSE OF JOHNNY E. MILLER

26 January 2024

Attorney Benjamin L. Shealy
City Of Rock Hill Solicitor's Office
201 E. Main Street, 3rd Floor
Rock Hill, SC 29730

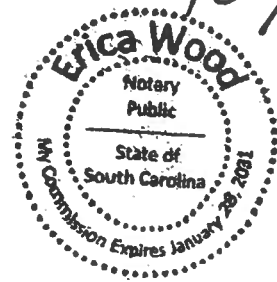
Sworn to and subscribed before me

This 26th Day of January, 2024

Erica Wood

Notary Public of South Carolina

My Commission Expires 01/29/2031



Re: Affidavit and Response To City of Rock Hill's Letter Dated 18 January 2024
City of Rock Hill v. Johnny Miller
Warrant Number 2023-A-46203-00966 – Harassment

This affidavit and response should be filed with your January 18th "nolle prosequing" letter and read juxtaposed to it, along with any letter or document that my brilliant and distinguished attorney (Mr. Jack Swerling of Columbia, SC) serves and/or files on this particular matter.

Dear Attorney Shealy,

I am grateful that you are "nolle prosequing" the above referenced case "with leave to restore for eighteen months." However, that doesn't address the thirty-six days (36) days that I spent incarcerated on 100% bogus charges stemming from the outrageous charge of harassment for conducting civil business during a bitter divorce. It is undisputed and well documented that the alleged victim who is also my ex-wife, Jacqueline Miller, worked for the Rock Hill Police Department at the time of the alleged harassment, and that the Rock Hill Police Department was the arresting and investigative agent in this matter. The municipal judge presiding over the case, the prosecutor, the arresting agent, the investigative agent, and the alleged victim were all on the City of Rock Hill's payroll at the time of the arrest and charge. It is also well documented that I have claimed my total 100% innocence from the beginning of this matter. What the City of Rock Hill did to me was based at least in part on racism and was tantamount to modern day slavery. I will never be able to get those thirty-six days of my life back, simply because a few humans decided to lie on me, and throw me in jail. The evidence clearly shows the unjust actions in this matter by the City of Rock Hill were planned, deliberated, and executed to have me repeatedly (3 times) thrown in jail for bogus reasons. Your January 18th "nolle prosequing" letter, in my opinion, is a defensive preemptive tactic to the lawsuit that the City of Rock Hill expects me to file against it for violation of my civil rights, kidnapping, false imprisonment, denigration of character, and anything else my attorneys deem appropriate. I am a native of Rock Hill, a law-abiding citizen, schoolteacher, an honorably discharged US veteran, and a Christian minister in the community, and have been for many years. Yet, the City of Rock Hill is attempting to destroy me on totally false allegations for purely selfish reasons.

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CP-46

Your January 18th "nolle prosequi" letter states; "It is unfortunate it took two contempt of court findings to get Mr. Miller to understand he could not contact her." This statement is at best misleading, at worst fraudulent. There was only one contempt of court charge in this case (which is currently on appeal), and it is bogus. **Please provide evidence for the "two contempt of court findings."** The single contempt of court charge was leveled against me for sending documents that the law required to be sent, as Ms. Miller and myself were both Pro Se litigants at the time the documents were sent. I was thrown in jail on three occasions by the City of Rock Hill; the first on the initial charge of "harassment" for 1 day, the second on "bond revocation" for 20 days, and the third on "contempt of court" for 15 days for a total of 36 days....all based on 100% bogus allegations. This in light of the fact that the original harassment charge only carries a sentence of 30 days for someone convicted of the crime. The purpose of the bogus contempt of court charge is to paint a picture of me as "an angry insubordinate black man" to get me fired from job as a schoolteacher. I refuse to allow you, the City of Rock Hill, the Rock Hill Police Department, and my ex-wife to make me hate. The goal for all evil and oppressive regimes is to make the subordinates hate. Oppressive regimes hate the subordinates, therefore the goal of oppressive regime is to make the subordinate hate the oppressive regime, so the oppressive regime can display an unjust reason to exert unjust punishment on the subordinate. The actions of The City of Rock Hill in this matter are outrageous, vindictive, sinister, and evil. I refuse to join you in hating. I am a Christian.

Furthermore, it is well documented that before I was arrested on the bogus charge of harassment. I filed police reports against my ex-wife and alleged victim, Jacqueline Miller, on at least four occasions for vandalism, harassment, and stalking....yet the Rock Hill Police refused to take any action against their fellow employee. I also filed three (3) complaints against the Rock Hill Police Department stemming from actions by Ms. Miller and her fellow employees, two of which are still pending.

To address your concern that I am "spreading rumors to the community at large about Ms. Miller," I can assure you that whatever I am saying, it's the truth, and doesn't come close to the damage that my ex-wife and the City of Rock Hill have done to me by having me falsely arrested on 100% bogus charges and thrown in jail for 36 days, with my mugshot plastered all over the internet in an orange jail uniform....to be seen by my students, friends, employer, co-workers, family, parishioners, and enemies.

To address the matter of Ms. Miller and myself possibly meeting each other at family gatherings concerning our grandchildren, I have always understood that this is something that our grandchildren's parents control. My concern is that during these gatherings Ms. Miller will again tell lies and attempt to have me incarcerated repeatedly....as history reveals this is her pattern. This immediate letter is to put all involved on notice that I fully suspect and expect my ex-wife, Jacqueline Miller, to continue her mission to destroy me with the full support of the Rock Hill Police Department behind her. At this immediate time, Ms. Miller and the City of Rock Hill have no incentive to stop harassing me and maligning my name.

Everything in this letter is substantiated by the record.

I will continue to seek justice in this matter through civil and lawful means.

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To reiterate, this affidavit and response should be filed with your January 18th "nolle prosequing" letter and read juxtaposed to it, along with any letter or document that my brilliant and distinguished attorney (Mr. Jack Swerling of Columbia, SC) serves and/or files on this particular matter.

Sincerely,

Johnny E. Miller

Johnny E. Miller
Ex-Defendant
1829 Paces River Ave. #106
Rock Hill, SC 29732
(803) 517-0378

Sworn to and subscribed before me
this 24th day of January, 2024
Erica Wood

Notary Public of South Carolina
My Commission Expires 01/28/2025



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CP-48



18 January 2024

Jack Swerling, Esquire
1720 Main Street, #301
Columbia, South Carolina 29201

Re: City of Rock Hill v. Johnny Miller
Warrant Number 2023-A-46203-00966 - Harassment

Dear Mr. Swerling:

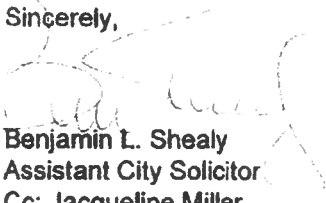
I am writing to inform you I am nolle prosequing with leave to restore for eighteen months the above case. The primary reason I chose this route is to ensure Mr. Miller has no contact with Ms. Miller during the next eighteen months. I believe the facts of the case meet all elements of the crime.

Since Mr. Miller was last held in contempt of court, he has not had any contact with Ms. Miller. That is Ms. Miller's primary objective. It is unfortunate it took two contempt of court findings to get Mr. Miller to understand he could not contact her. However, I did my utmost to get him to stop prior to filing any motions.

Should Mr. Miller contact Ms. Miller directly or through third parties during the eighteen-month period I will reopen the case. It is also my understanding he is spreading rumors to the community at large about Ms. Miller. Please ask him to stop doing so as it serves no purpose other than to escalate problems within their church community.

I spoke with Ms. Miller about celebrating the birthdays of the grandchildren with both being present. Ms. Miller told me, and I agree, that the decision in the matter is a decision for their children, not she and Mr. Miller. All decisions on those matters must be made by the parents of the grandchildren.

Sincerely,


Benjamin L. Shealy
Assistant City Solicitor
Cc: Jacqueline Miller

CITY OF ROCK HILL SOLICITOR'S OFFICE

201 E. MAIN STREET, 3RD FLOOR, ROCK HILL, SOUTH CAROLINA 29730
OFFICE 803/329-5619 FACSIMILE 803/326-3865

CP-49
111

EXHIBIT CP-I

York County Sheriff's Office

Status	Active
Report Type	Case
Primary Officer	Scott Lowder
Investigator	Scott Lowder
Records Technician	Jo-Anne Lee
Reported At	07/13/21 16:00
Incident Date	02/13/21 17:00 - 02/13/21 20:00
Incident Code	Domestic - PSC : Domestic
Location	4107 SUNSET RIDGE DR. ROCK HILL, SC 29732
Zone	ROCK HILL
Beat	DESK
Court	None
Referral County	None

Disposition: Unfounded
Disposition Date/Time: 07/27/21 10:13
Review for Gang Activity: None

M.C

Offender:

Miller, Jacqueline
Female DOB 8/10/88
4107 SUNSET RIDGE DR
ROCK HILL SC 29732
(803) 417-2542

19-26-21-0 - DOMESTIC VIOLENCE ORD DEGREE

Suspect:

CP-5
113

Miller, Jacqueline
Female, DOB 3/10/63
4107 SUNSET RIDGE DR

16-25-20(D) - DOMESTIC VIOLENCE 3RD DEGREE

ROCK HILL, SC 29732
(803) 417-2542

Victim

Miller, Johnny Earl
Male, DOB 9/22/62
4107 SUNSET RIDGE DR
ROCK HILL, SC 29732
(803) 517-0378

16-25-20(D) - DOMESTIC VIOLENCE 3RD DEGREE

Primary Narrative By Scott Lowder

On July 13th, 2021, Deputy Lowder spoke with Johnny Miller in reference to his wife, Jacqueline Miller, assaulting him approximately 6 months ago. Johnny stated it has been going on for a while, but hasn't been physical since the last incident. Johnny stated that he was sitting on the couch during that incident and she poked him in his eye. Johnny stated that she does try to annoy him, possibly to have him strike her, but he stated he hasn't struck her. They reside at 4107 Sunset Ridge, Rock Hill, SC in the County of York. Johnny provided Jacqueline's phone number and stated he wanted to at least get it documented. There was no photographic evidence from this incident.
J 7/29/21

Supplemental Narrative By Carson Neely

On July 27, 2021, I spoke with Mr. Miller about this report. Mr. Miller provided details of how he has been physically abused for approximately 40 years. The last physical incident was in January 2021 (7 months prior). Mr. Miller said that he was poked in the eye by Mrs. Miller. Mr. Miller said that there were no physical injuries present today. He has been living with her in the home since this incident minus the times that Mrs. Miller has left him. Mr. Miller said that he filed this report due to Mrs. Miller leaving him this last time. This phone call was recorded and will be added to the report.

Supplemental Narrative By Carson Neely

On July 27, 2021, I was advised that YCSO would not be investigating this incident. This report will be unfounded due to the incident occurring in Rock Hill City's jurisdiction.

114



Rock Hill

CP-52

Rock Hill Police Department • South Carolina • www.rockhillpd.com

Case P2108010028

Printed on August 4, 2021

Status Approved
Report Type Patrol
Primary Officer Matthew Palmer
Investigator None
Reported At 08/01/21 21:05
Incident Date 08/01/21 21:05 - 08/01/21 21:05
Incident Code VAND : Vandalism
Location 4107 SUNSET RIDGE DR, ROCK HILL, SC 29732
Beat RH01

Disposition Administrative Closure
Disposition Date/Time 08/01/21 21:32
Review for Gang Activity None

M.O.

Peeping Tom

Status Indicator Administratively
 Closed

Status Change Date 8/1/21

Offense Information

Offense MALICIOUS INJURY TO REAL PROPERTY < \$2000 (3)
Statute 16-11-520(A)
SCIBRS Code 290 - Destruction/Damage/Vandalism of Property
Counts 1
Date 8/1/21
Include In NIBRS Yes
Completed Yes
Bias Motivation None (no bias)
Location Residence/Home
Entry Forced No

Complainant

MILLER, JOHNNY EARL - Age 58

16-11-520(A) - MALICIOUS INJURY TO REAL
PROPERTY < \$2000 (3)**Victim**

MILLER, JOHNNY EARL - Age 58

16-11-520(A) - MALICIOUS INJURY TO REAL
PROPERTY < \$2000 (3)**Primary Narrative By Matthew Palmer, 08/01/21 22:35**

On 8/1/21 at approximately 2105 hrs, Officer Palmer responded to 4107 Sunset Ridge Drive, which is located within the city limits of Rock Hill, in reference to damage to property. Upon arrival, Officer Palmer met with Johnny Miller who advised that when he returned home, he observed that the screen on his back screen door was cut in several places and that the door latch had been lifted. Johnny advised that he believes his soon to be ex-wife may have had

Case P2108010028

Page 1 of 2

something to do with it but did not know for sure. There was no other damage to any of the other surrounding areas. Mr. Miller advised that he needed this incident documented. Case is admin closed.

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115

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CP-54


**Rock Hill
POLICE**


Rock Hill Police Department • South Carolina • www.rockhillpd.com

Case P2208120375

Printed on August 22, 2022

Status	Approved
Report Type	Patrol
Primary Officer	Camilo Perez
Investigator	None
Reported At	08/12/22 22:14
Incident Date	08/12/22 20:40 - 08/12/22 21:15
Incident Code	TRES : Trespassing
Location	1829 PACES RIVER AV APT 106, ROCK HILL, SC 29732
Beat	RH02

Disposition	Forward to Other Agency
Disposition Date/Time	08/15/22 09:58
Review for Gang Activity	None

M.O.
No MO

Status Indicator	Administrative Filler
Status Change Date	8/12/22

Offense Information

Offense	INVESTIGATION - OTHER
Statute	INVEST
SCIBRS Code	90Z - All Other Offenses
Counts	1
Date	8/12/22
Include In NIBRS	Yes
Completed	No
Bias Motivation	None (no bias)
Location	Apartments/Condominiums
Entry Forced	No

Complainant

MILLER, JOHNNY EARL - Age 59	INVEST - INVESTIGATION - OTHER
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Suspect

MILLER, JACQUELINE - Age 59	INVEST - INVESTIGATION - OTHER
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Witness

MILLER, JOHNNY EARL - Age 59	INVEST - INVESTIGATION - OTHER
PICKETT, VERA LYNN - Age 59	INVEST - INVESTIGATION - OTHER

Primary Narrative By Camilo Perez, 08/12/22 23:54

117 CP-55

On August 12th, 2022, Officer Perez contacted Johnny Miller over the phone in reference to a possible violation of a No Contact order. This incident occurred at 1829 Paces River Av APT 106, which is within the city limits of Rock Hill, county of York, SC.

Over the phone, Johnny stated that he has a mutual restraining order with his ex-wife, Jacqueline Miller. Johnny stated that he was at home in his apartment having dinner with Vera Pickett. Vera was outside making a phone call and Johnny was inside when Johnny states that Jacqueline came up to his patio railing and started to record Johnny and Vera around 2050hrs. Johnny stated that Jacqueline was making obscene and rude comments toward Johnny and Vera. Johnny stated that Jacqueline was filming the two with her arms on the patio rail. Johnny stated he went to the patio door and had Vera go back into the residence and closed the blinds. Roughly 20 minutes later, Johnny stated he was walking Vera out to her vehicle and saw that Jacqueline was still in the parking lot waiting for them. Johnny stated that Jacqueline made additional comments but neither Johnny or Vera interacted with Jacqueline. Johnny stated that Vera would be willing to make a witness statement.

Sgt M Englert contacted Jacqueline Miller via phone call. Over the phone Jacqueline stated that she did go to his residence to get proof of Johnny with another woman. Jacqueline stated that she never entered his property or touched the patio. Jacqueline admitted that she did record Johnny and Vera, and offered to show Sgt M Englert. Jacqueline states that the video she recorded would show that she did not enter his property line and violate the restraining order. Officers did not watch the video at this time.

Case is Active.

Supporting Narrative By Carlos Culbreath, 08/15/22 09:58

This case will be not be investigated by the RHPD. This case was forwarded to the York County Sheriff's Office.

118 York County Sheriff's Office

CP-56

Case SO202208227

Printed on August 22, 2022

Status	Approved
Report Type	Case
Primary Officer	Austin Quinn
Investigator	Carson Neely
Records Technician	Jo-Anne Lee
Reported At	08/13/22 11:14
Incident Date	08/12/22 09:50 - 08/13/22 11:14
Incident Code	Harassment - PSC : Harassment
Location	1829 PACES RIVER AV APT 14-106 ROCK HILL, SC 29732
Zone	ROCK HILL
Beat	3C
Court	None
Ereferral County	None

Disposition Active/Open
Disposition Date/Time 08/13/22 11:23
Review for Gang Activity None

M.O.

Stalking - Residence

Status Indicator Approved
Filer

Status Change Date 8/13/22

District District 3

Offender:

Miller, Jacqueline

Female, DOB 3/10/63

16-3-1700(A) - HARASSMENT 1ST DEGREE

4107 SUNSET RIDGE DR

ROCK HILL, SC 29732

(803) 417-2542

Suspect

Miller, Jacqueline

Female, DOB 3/10/63

16-3-1700(A) - HARASSMENT 1ST DEGREE

4107 SUNSET RIDGE DR

ROCK HILL, SC 29732

(803) 417-2542

Victim

Miller, Johnny Earl

Male, DOB 9/22/62

16-3-1700(A) - HARASSMENT 1ST DEGREE

1829 PACES RIVER AV Apt 14-106

ROCK HILL, SC 29732

(803) 517-0373

Primary Narrative By Austin Quinn

119 CP-57

On 08/13/2022 Deputies responded to 1829 Paces River Ave Apt. 14-106, Rock Hill, York County, SC in reference to a harassment. Upon arrival Deputy Quinn spoke with Johnny Miller who advised that he and his wife whom he is separated from Jacqueline Miller have been going through a very nasty divorce for a little over a year and that Jacqueline has been harassing Johnny at his residence at 1829 Paces River. Johnny stated to Deputy Quinn that this was an ongoing issue between both parties and that he and Jacqueline both had restraining orders against each other. Johnny advised Deputy Quinn that on 08/12/2022 at around 21:50hrs Jacqueline showed up in the woods behind Johnny's apartment patio and was video recording Johnny and a friend that he was having over for dinner at the time. Johnny showed Deputy Quinn this video on his home computer. In the video Johnny can be seen through the patio door cooking dinner and his female friend was on the porch. Jacqueline could be heard in the video making statements saying "you smiling, yeah you smiling". Johnny's friend then tells Johnny "Hey you have someone out here". Jacqueline continued making statements about how Johnny was the one committing adultery even though Johnny accused her of committing adultery. Johnny then showed Deputy Quinn a picture that was sent to by a third party of Johnny and his female friend walking at the Paces River apartment complex. Johnny stated this picture was taken by Jacqueline and sent to his church goers. Johnny stated that the third party individual who sent him the picture was someone who attends his church. Johnny stated to Deputy Quinn that he wanted Jacqueline arrested for harassment and felt that if nothing was done he was in fear of what she may do to him.

All photos and videos were uploaded to evidence.com

This case is active.
jl 8/15/22

120

CP-58

York County Sheriff's Office

Status Approved
 Report Type Case
 Primary Officer Lamar Anthony
 Investigator None
 Records Technician JoAnna Lee
 Reported At 08/28/22 12:58
 Incident Date 08/28/22 12:58 - 08/26/22 12:58
 Incident Code Make Investigation - PSC / Make Investigation
 Location 198 GRAYSON RD ROCK HILL SC 29732 (CHURCH @ ROCK HILL)
 Zone ROCK HILL
 Beat 8A
 Court None
 Referral County None

Disposition Adm. Strate. Order
 Disposition Date/Time 08/27/22 14:00
 Revision for Gang Activity: No

M.O.

KATHA E. MILLER

DOB: 01/01/1971

Gender: Female

Height: 5'00"

Weight: 110 lbs

Hair: Black

Eyes: Brown

Skin: Fair

DOB: 01/01/1971

POB: SC

Current Address:

Domestic Violence: No

Criminal History:

Miller, Johnny Earl

Male DOB: 01/01/1971

Domestic Violence: Other Offenses

1828 PACES RIVER AVE ARLINGHAM

ROCK HILL SC 29732

(803) 517-0378

Offender:

Case: SC202203821

Page: 1 of 1

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Miller, Jacqueline
Female, DOB 8/10/63
4107 SUNSET RIDGE DR

COMMON - All Other Offenses

ROCK HILL, SC 29732
(803) 417-2542

Suspect

Miller, Jacqueline
Female, DOB 8/10/63
4107 SUNSET RIDGE DR
ROCK HILL, SC 29732
(803) 417-2542

COMMON - All Other Offenses

Victim

Miller, Johnny Earl
Male, DOB 8/21/41
1324 PACES HWY
ROCK HILL, SC 29732
(803) 417-2542

COMMON - All Other Offenses

On 08/28/2022 at 11:00 AM, Deputy Anthony [redacted] was dispatched to 1324 PACES HWY, ROCK HILL, SC 29732, for a domestic disturbance. Upon arrival, Deputy Anthony observed a male (Johnny Earl Miller) and a female (Jacqueline Miller) in a heated argument. The male was shouting and gesturing aggressively towards the female. The female was crying and appeared distressed. Deputy Anthony attempted to de-escalate the situation by separating the parties and speaking to them individually. The male refused to leave the premises and continued to threaten the female. Deputy Anthony advised the female to call the police if the situation did not improve. The female agreed to do so. Deputy Anthony then contacted law enforcement for assistance. The police arrived and took the male into custody. The female was released and advised to seek counseling. Deputy Anthony collected information from all parties and cleared the scene. The case was closed on 08/29/2022.

Deputy Anthony [redacted] was dispatched to 1324 PACES HWY, ROCK HILL, SC 29732, for a domestic disturbance. Upon arrival, Deputy Anthony observed a male (Johnny Earl Miller) and a female (Jacqueline Miller) in a heated argument. The male was shouting and gesturing aggressively towards the female. The female was crying and appeared distressed. Deputy Anthony attempted to de-escalate the situation by separating the parties and speaking to them individually. The male refused to leave the premises and continued to threaten the female. Deputy Anthony advised the female to call the police if the situation did not improve. The female agreed to do so. Deputy Anthony then contacted law enforcement for assistance. The police arrived and took the male into custody. The female was released and advised to seek counseling. Deputy Anthony collected information from all parties and cleared the scene. The case was closed on 08/29/2022.

Deputy Anthony collected information from all parties and cleared the scene.
08/29/22

York County Sheriff's Office

Case SO202209421

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Printed on September 21, 2022

122
Status Approved
Report Type Case
Primary Officer James Voytko
Investigator Carson Neely
Records Technician Hannah Lilly
Reported At 09/12/22 08:01
Incident Date 09/11/22 12:15 - 09/11/22 12:17
Incident Code Harassment - PSC : Harassment
Location 1829 PACES RIVER AV APT 106, ROCK HILL, SC 29732
Zone ROCK HILL
Beat DESK
Court None
Referral County None

Disposition Ex Cleared- Prosecution Declined
Disposition Date/Time 09/20/22 14:05
Review for Gang Activity None

M.O.
Stalking - Residence

Status Indicator Administrative
Filler

Status Change Date 9/20/22
District District 3

Offense Information

Offense STALKING (INJUNCTION/RESTRAINING ORDER IN EFFECT)
Statute 16-3-1700(C)
SCIBRS Code 753 - Harassing/Obscene Telephone Calls
Counts 1
Date 9/12/22
Include In NIBRS Yes
Completed Yes
Bias Motivation None (no bias)
Location Residence/Home
Entry Forced No
Domestic Violence Not Domestic

Complainant

Miller, Johnny Earl
Male, DOB 9/22/62
1829 PACES RIVER AV Apt 14-106
ROCK HILL, SC 29732
(803) 517-0378 Cell

16-3-1700(C) - STALKING
(INJUNCTION/RESTRAINING ORDER IN EFFECT)

Offender

Miller, Jacqueline Brown
Female, DOB 3/10/63
4107 SUNSET RIDGE DR

16-3-1700(C) - STALKING
(INJUNCTION/RESTRAINING ORDER IN EFFECT)

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123

ROCK HILL, SC 29732
(803) 417-2542 Cell

Suspect

Miller, Jacqueline Brown
Female, DOB 3/10/63
4107 SUNSET RIDGE DR
ROCK HILL, SC 29732
(803) 417-2542 Cell

16-3-1700(C) - STALKING
(INJUNCTION/RESTRAINING ORDER IN EFFECT)

Victim

Miller, Johnny Earl
Male, DOB 9/22/62
1829 PACES RIVER AV Apt 14-106
ROCK HILL, SC 29732
(803) 517-0378 Cell

16-3-1700(C) - STALKING
(INJUNCTION/RESTRAINING ORDER IN EFFECT)

Primary Narrative By James Voytko

On Monday September 12, 2022 I was dispatched to contact a one Johnny Earl Miller regarding stalking from his wife with whom he is separated, Jacquelin Brown Miller.

Johnny stated that yesterday whenever he returned home from being away from his apartment that his neighbor, who wishes to remain anonymous, told him that he saw a lady lurking around his back deck between 1215 and 1217 hours. The neighbor stated that it appeared that the woman was taking pictures. Johnny did watch his security camera and did confirm that it was Jacquelin who was at his property. He described her as wearing a red top with black capri pants. She was standing right outside of his back deck.

There is to be a restraining order put in place against Jacquelin. There have also been at least two other reports made of similar misconduct against the restraining order. These reports are, SO202208227 and SO202208817. I did provide Johnny with a sharelink to upload video to this report. He stated that he doesn't have a copy of the restraining order on hand but that the judge and court who issued that order should have a copy.

REPORT TAKEN BY DESK

hl091222

Supplemental Narrative By Carson Neely

Based on previous reports, SLED investigation and on going family court issues, prosecution is denied.

hl092122



ROCK HILL
POLICE

CP-62



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Case P2506040097

Printed on June 25, 2025

Status Approved
Report Type Patrol
Primary Officer Taylor Hawkins
Investigator Eric Olson
Reported At 06/04/25 13:01
Incident Date 05/04/25 13:01 - 06/04/25 13:01
Incident Code HARS : Harassment
Location 1829 PACES RIVER AV APT 106, ROCK HILL, SC 29732
Beat RH02

Disposition Unfounded
Disposition Date/Time 06/12/25 11:38
Review for Gang Activity None

M.O.
No MO

Status Indicator Unfounded
Status Change Date 6/12/25

Offense Information

Offense INVESTIGATION - THREATS/HARRASSMENT
Statute INVEST
SCIBRS Code 90Z - All Other Offenses
Counts 1
Date 6/4/25
Include In NIBRS Yes
Completed Yes
Bias Motivation None (no bias)
Location Residence/Home
Entry Forced No

Complainant

MILLER, JOHNNY EARL - Age 62

INVEST - INVESTIGATION -
THREATS/HARRASSMENT

Victim

MILLER, JOHNNY EARL - Age 62

INVEST - INVESTIGATION -
THREATS/HARRASSMENT

Primary Narrative By Taylor Hawkins, 06/04/25 13:52

On Wednesday, June 4, 2025, at approximately 1:13pm. Officer Hawkins met with Johnny Miller in the Law Center Lobby regarding harassment from his ex-wife
Johnny Miller resides at 1829 Paces River Avenue

125 CP-63
Apartment 106, which is located within the city limits of Rock Hill, County of York, South Carolina.

Johnny Miller advised that he has been harassed by numerous times throughout the time period of 2023 - present date. Johnny advised that as of today he received a letter in the mail regarding an official trespass from his church (Gospel of the Kingdom) due to a previous "bogus" harassment charge that was brought against him by in 2023. Johnny claims that the original charge was nol pros and he found out in February or March of 2025 that the original charges were reinstated. Johnny provided Officer Hawkins a copy of the letter he received which detailed that he was placed on trespass due to his actions, inaccurate statements, and current no contact order. Johnny also provided a copy of the no contact order, which was originally dated in April of 2023 and signed by Johnny. Johnny claimed he did not know he had a no contact order against him until receiving the letter. Johnny continued and stated that in May of 2025 he attended a graduation dinner at the Olive Garden on Dave Lyle Boulevard for his niece. Johnny advised that was there and she was talking "junk" about him in an attempt to get a reaction from him, knowing that she had a no contact order against him. Johnny continued and advised that his sister, Joyce Miller and brother, Gregory Miller witnessed the incident.

Officer Hawkins asked if had been contacting him electronically, however he stated no. Officer Hawkins also asked if there were any other incidents other than in May and 2023-2024 and Johnny advised there were not. Johnny was unable to give specific dates of his interactions with Johnny also advised that he has made numerous harassment/stalking reports against in which he described recording him in his home and being in his backyard. Johnny also advised that he feels nothing is being done because is employed by Rock Hill.

Officer Hawkins uploaded copies of the paperwork provided.

This case remains active.

Supporting Narrative By Carlos Culbreath, 06/11/25 16:04

On June 11, 2025, Lt. Culbreath contacted Mr. Johnny Miller in reference to his harassment complaint involving his ex-Lt. Culbreath explained to Mr. Miller that he reviewed his case, and that his complaint did not warrant a criminal investigation as well there is no probable cause to prove or support that was harassing him. This case will be unfounded due to the fact that a crime was not committed.

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STATE OF SOUTH CAROLINA
COUNTY OF YORK

Johnny E. Miller
Appellant

vs.

Jacqueline Miller
Respondent

IN THE YORK COUNTY CIRCUIT
COURT OF COMMON PLEAS
Case No. 2025CP4604122

APPEAL FROM THE CATAWBA/EBENEZER
MAGISTRATE COURT
Case No. 2025OR4610300055

MOTION TO RECONSIDER

I, the Appellant Johnny E. Miller, do hereby motion this Honorable Court to reconsider its' decision and order rendered on December 18, 2025 and signed by the Honorable G.D. Morgan Jr. for the following reasons among others:

1) As the Appellant has stated many times before....including before this Honorable Court, in the lower Court, and in other judicial venues....the Appellant has never harassed his ex-wife, Jacqueline Miller the Respondent, in his entire life and there is absolutely no legitimate legal reason for a restraining order of any kind to be issued against him. The bogus restraining order in this immediate matter, the forty days that the Appellant spent falsely incarcerated for the bogus harassment charge against the Respondent (for which he was found NOT GUILTY by a jury trial), the Appellant being wrongfully fired from his job as a public school teacher, the Appellant being cheated out of \$35,000.00 by an attorney who was/is in cahoots with York County South Carolina Judicial Officials and the Rock Hill Police, the Appellant having his home taken from him by thieves in black robes and gavels in-hand, and the Appellant's civil rights being constantly violated by the York County South Carolina powers that be....are all examples of modern-day slavery. Bryan Stevenson, a Harvard graduate, attorney, law professor, civil-rights advocate/activist, and author stated that "slavery did not end in 1865, it just evolved." However, the Appellant wants all to know that as an authentic Christian, he forgives and loves all involved, and by God's grace has no animosity in his heart towards anyone. The Appellant simply desires to please God through Jesus Christ, put all of this legal non-sense behind him, and move forward in love, righteousness, and peace.

2) The lower court (Magistrate Judge Jennifer Colton) erred repeatedly in her Return On Appeal (*Return*), yet this court states on page 2 of the said decision and

order that “The Court finds Appellant did not present any evidence that the lower court erred in reaching its decision.” The Appellant’s Answer To Return On Appeal (*Answer*) is replete with the citing of numerous errors in the lower court’s Return. The Appellant will not rewrite or cite again here in this immediate motion **ALL** the numerous errors made by the lower court, especially in light of the fact that a jury found the Appellant NOT GUILTY of harassment on the exact same bogus allegations by the Respondent (Jacqueline Miller) that the lower court based issuing the bogus restraining order that is on appeal in this matter. And all of this on top of the factual history (not fictitious history like the lower court’s Return) surrounding this case that clearly show that the Appellants civil rights were violated by the Rock Hill Police Department, the City of Rock Hill, York County Judiciary Officials....and others....in regards to the Fourth, Fifth, Sixth, and Fourteenth amendments of the Constitution of the United States of America.

3) The lower Court’s Return is an erroneous fictitious narrative, without support of a transcript or recording of the July 24, 2025 hearing wherein testimony was given by the Appellant, two witnesses on the behalf of the Appellant (Mrs. Melissa Randall and Mr. Marchavis Caldwell), and the Respondent. The lower Court erroneously and fictitiously found the Respondent’s testimony to be more “credible” than the combined testimony of Mrs. Randall, Mr. Caldwell, and the Appellants’. All of this on top of the fact that a “technical error” prevented a transcript or recording of the restraining order hearing to exist. The Appellant clearly asserts that he believes that the transcript and/or recording of the restraining order hearing was intentionally done away with by the lower Court in an effort to set-forth her fictitious Return as Truth, when in essence it is absolutely NOT THE TRUTH. This is a clear error on the lower Court’s behalf. The jury in the harassment trial certainly didn’t find the Respondent’s testimony more “credible” than the Appellant’s and those who testified on his behalf.

4) Mrs. Melissa Randall and Mr. Marchavis Caldwell were both present at both of the hearings that the Appellant and Respondent were before Judge Colton in this matter in the lower court on the dates of July 24, 2025 and October 8, 2025. Mrs. Randall and Mr. Caldwell both testified as witnesses on behalf of the Appellant at the July 24, 2025 hearing before Judge Colton, and both have both submitted more than one affidavit each concerning what was said and testified in both hearings. Both Mrs. Randall and Mr. Caldwell in their affidavits directly refute what the lower Court has erroneously submitted in its’ Return. Both Mrs. Randall and Mr. Caldwell, and the Appellant were denied the opportunity to have their testimonies recorded as evidence due to an alleged “technical error” in the July 24, 2025 hearing before Judge Colton in the lower Court. Again, Mrs. Randall, Mr.

Caldwell, and the Appellant were denied the opportunity to have their testimonies recorded as evidence at the October 8, 2025 hearing in this matter before Judge Colton in the lower Court for no other reason than Judge Colton would not allow them to, because she knew in doing so, there would be strong recorded evidence to refute her lies. The Appellant states this as respectfully as possible. Mrs. Randall and Mr. Caldwell were also both present and willing to testify before this Honorable Court at the December 18, 2025 appeal hearing, to get their testimonies recorded as evidence in refutation to the Return. However, this Honorable Court refused to allow Mrs. Randall and Mr. Caldwell to testify before it.

5) The lower court clearly errors in contradicting herself repeatedly concerning a self-imposed limitation that testimony concerning issues more than six months prior to the day the bogus restraining order was issued (July 24, 2025) would not be admissible, considered, nor allowed as evidence in issuing the restraining order. Yet, the lower court repeatedly cites testimony concerning issues more than six months prior to July 24, 2025 as the evidence to grant the bogus restraining order. The Appellant clearly alleges in the Answer (and in other court filings pertaining to this matter) that the lower Court erroneously limited testimony to six-months in an effort to prevent the many police reports that the Appellant has filed against the Respondent for assault, harassment, property destruction, and stalking to show a pattern of detrimental behavior against the Appellant by the Respondent, with the Respondent being aided and abetted by York County law officials. What the Respondent, the Rock Hill Police Department, and other York County Judicial Officials have done to the Appellant over the past few years is tantamount to bullying, harassment, stalking, torture, and modern-day slavery.

6) The Respondent refuted the Return herself before this Honorable Court, stating in the December 17, 2025 hearing that the Appellant divorced her, wherein the Return from the lower Court clearly infers that the Respondent divorced the Appellant, and that the Appellant was longing to be with the Respondent again as "family." Amazing.

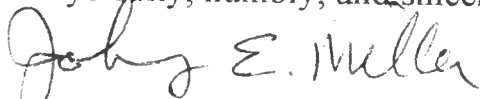
7) Very respectfully, it is crystal clear to the Appellant that the lower Court is acting as an immoral, irrational, and corrupt dictator in this matter. The lower Court is intentionally ignoring justice, ignoring the verdict of a jury, ignoring the spirit of the law, and ignoring the fact that one of her colleagues (Judge Curtis Cousins) denied a restraining order to the Respondent based on the exact same type of allegations of harassment in the exact same lower Court. The lower Court is imposing her own selfish will on an oppressed black authentic Christian man. The lower Court's decision and ruling to grant the appealed restraining order is based

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solely on nothing but her own motives and mind, from which came the fictitious narrative she calls a Return.

For the errors of the lower Court cited herein, and for other reasons and errors pertaining to the lower Court, the appeal of the bogus restraining order should be reconsidered and granted, and the result should be that restraining order be done away with immediately or as soon as possible in the most legal, efficient, and viable way.

Prayerfully, humbly, and sincerely submitted,

A handwritten signature in cursive script that reads "Johnny E. Miller". The signature is written in dark ink and is positioned above the printed name.

Johnny E. Miller

Appellant (Pro Se)

December 29, 2025

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STATE OF SOUTH CAROLINA
COUNTY OF YORK

Johnny E. Miller
Appellant

vs.

Jacqueline Miller
Respondent

IN THE YORK COUNTY CIRCUIT
COURT OF COMMON PLEAS
Case No. 2025CP4604122

APPEAL FROM THE CATAWBA/EBENEZER
MAGISTRATE COURT
Case No. 2025OR4610300055
THE HONORABLE JENNIFER COLTON

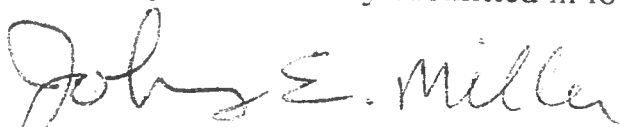
MOTION TO RECONSIDER

CERTIFICATE OF SERVICE

I, the Appellant Johnny E. Miller, hereby certify that I served the *Motion To Reconsider* on the Respondent, Jacqueline Miller, via the York County, SC Sheriff's Office as the server....to the following address which is the home residence of the Respondent:

Jacqueline B. Miller
616 Melville Dr.
Rock Hill, SC 29732

Sincerely and truthfully submitted in love,



Johnny E. Miller
1829 Paces River Ave.
Apt. #106
Rock Hill, SC 29732
(803) 517-0378
johnnymillerjohn@aol.com
Appellant (Pro Se)
December 29, 2025

STATE OF SOUTH CAROLINA
COUNTY OF YORK

IN THE MAGISTRATE COURT

131

Jacqueline Miller

PLAINTIFF(S)

RESTRAINING ORDER

Vs

2025OR4610300055
CIVIL CASE NUMBER

Johnny Earl Miller

DEFENDANT(S)

JUL 24 '25 14:58

And/or on behalf of minor family
member(s) or other protected persons:
(List name)

DEFENDANT IDENTIFIERS				
SEX *	RACE *	DOB *	STATE	WEIGHT
M	B	09/22/1962	SC	225
EYES	HAIR	HEIGHT		
Brown	Bald	6'0"		
Relationship to Plaintiff		Ex-husband		

1829 Paces River Ave, Apt 14-106, Rock Hill, SC 29732

Defendant's Address

CAUTION:

*Indicates required information for entry into NCIC

☐ Weapon Involved

☐ Weapon Present on Defendant's Property

☐ Access to weapons

THE COURT HEREBY FINDS:

That it has jurisdiction over the parties and subject matter,
Defendant has been provided with reasonable notice and opportunity to be heard.
Additional findings of this order are as set forth below.

THE COURT HEREBY ORDERS:

- ☒ That the above named Defendant be restrained from committing further acts of abuse or threats of abuse.
☒ That the above named Defendant be restrained from any contact with the Protected Person as set forth on
the attached pages.

The terms of the this order shall be effective until

July 24

2026

WARNINGS TO DEFENDANT:

This order shall be enforced in any county of South Carolina and by the courts of any state, District of Columbia, any U. S. Territory, and may be enforced by Tribal Lands (18 U.S.C. Section 2265). Crossing state, territorial, or tribal boundaries to violate this order may result in federal imprisonment (18 U.S.C. Section 2262).

State and federal law provides penalties for possessing, transporting, shipping, or receiving any firearm or ammunition (18 U.S.C. Section 922).

Only the Court can change this order.

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For Additional Information Call:

803-628-3059
Sheriff Phone Number

803-909-7600
Clerk of Court Phone Number

After the filing of a complaint and motion for a Restraining Order on June 24, 2025, the Court held a hearing on July 24, 2025 at 1:00 PM. After hearing the evidence, and examining the affidavits and verified pleadings, the Court has determined that the plaintiff has not proved by a preponderance of evidence the need for issuance of a Restraining Order.

The Court makes the following findings of fact: (Check all that apply)

- ☒ 1. The Plaintiff lives in York County, SC.
- ☒ 2. The Defendant lives at 1829 Paces River Ave # 106 which is in York County, SC.
- ☐ 3. The Defendant is employed at _____ which is located at _____.
- ☒ 4. The Defendant:
 - ☐ is a current or former spouse of the victim.
 - ☐ is a current or former intimate partner of the minor child's parent (minor child is protected person)
 - ☐ is a parent of the victim
 - ☐ cohabits or previously cohabited with the victim
 - ☐ has a child/children in common with the victim
 - ☐ is a person similarly situated to a spouse of the victim
 - ☐ other: _____
- ☐ 5. The Defendant is a resident of this state or county of the county.
- ☐ 6. The Harassment or Stalking, as described in Article 1, occurred in York County, South Carolina.
- ☒ 7. The Defendant has committed the following acts which constitute Harassment in the 1st or 2nd degree or Stalking: Continued unwanted contact via calls, texts, and appearing at Plaintiff's place of employment.

IT IS THEREFORE ORDERED THAT (Check all that apply):

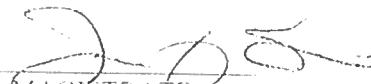
- ☐ A. The Defendant is restrained, prohibited and forbidden from abusing, threatening to abuse, or molesting the Plaintiff or members of Plaintiff's family, to include:
 - ☐ B. The Defendant is restrained, prohibited and forbidden from entering or attempting to enter the Plaintiff's place of residence, employment, education, or the following locations: _____
 - ☒ C. The Defendant is restrained, prohibited and forbidden from communicating or attempting to communicate with the Plaintiff in any way, to include: _____
 - ☐ D. Federal Firearm Prohibition pursuant to 18 U.S.C. § 922
 - 1. Does the Order protect an intimate partner or child of an intimate partner of the defendant? ☐ YES ☒ NO
 - 2. Did the person restrained have actual notice and an opportunity to participate in the hearing? ☐ YES ☒ NO
 - 3. Does the Order find the restrained person a credible threat or explicitly prohibit the use, attempted use, or threatened use of physical force? ☐ YES ☒ NO
 - ☒ E. A copy of this Order shall be served on the following law enforcement agencies:
 - ☒ Rock Hill Police Department
 - ☒ York County Sheriff's Office

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The terms of this Order remain in effect until July 24, 2026, (a period of at least one year) and may be extended by this Court for good cause shown. If the defendant has been or is during the duration of this Order charged with the crime of Harassment in the 1st or 2nd degree or Stalking, the terms of this Order remain in effect until the conclusion of the defendant's trial.

AND IT IS SO ORDERED.

Entered at 2:45 ☐ a.m. / ☒ p.m. on July 24, 2025


MAGISTRATE

VIOLATION OF THIS ORDER IS A CRIMINAL OFFENSE PUNISHABLE BY THIRTY DAYS IN JAIL, A FINE OF FIVE HUNDRED DOLLARS, OR BOTH, AND IS IN ADDITION TO OTHER CRIMINAL PENALTIES WHICH MAY RESULT FROM SUCH ACTION.

PURSUANT TO SECTION 16-25-125 OF THE SOUTH CAROLINA CODE OF LAWS, IT IS UNLAWFUL FOR A PERSON WHO HAS BEEN CHARGED WITH OR CONVICTED OF CRIMINAL DOMESTIC VIOLENCE OR CRIMINAL DOMESTIC VIOLENCE OF A HIGH AND AGGRAVATED NATURE, WHO IS SUBJECT TO AN ORDER OF PROTECTION, OR WHO IS SUBJECT TO A RESTRAINING ORDER, TO ENTER OR REMAIN UPON THE GROUNDS OR STRUCTURE OF A DOMESTIC VIOLENCE SHELTER IN WHICH THE PERSON'S HOUSEHOLD MEMBER RESIDES OR THE DOMESTIC VIOLENCE SHELTER'S ADMINISTRATIVE OFFICES. A PERSON WHO VIOLATES THIS PROVISION IS GUILTY OF A MISDEMEANOR AND, UPON CONVICTION, MUST BE FINED NOT MORE THAN THREE THOUSAND DOLLARS OR IMPRISONED FOR NOT MORE THAN THREE YEARS, OR BOTH. IF THE PERSON IS IN POSSESSION OF A DANGEROUS WEAPON AT THE TIME OF THE VIOLATION, THE PERSON IS GUILTY OF A FELONY AND, UPON CONVICTION, MUST BE FINED NOT MORE THAN FIVE THOUSAND DOLLARS OR IMPRISONED FOR NOT MORE THAN FIVE YEARS, OR BOTH.

TO LAW ENFORCEMENT OFFICERS:

Notwithstanding any other provision of law, the terms of this Order are enforceable throughout this State, S.C. Code Ann. § 16-3-1750(F). Any person who violates a provision of this Order is subject to a fine of \$500 or imprisonment not to exceed thirty days, or both, S.C. Code Ann. § 16-3-1770(C). Law enforcement officers shall arrest a defendant who acts in violation of this Order after service and notice of the Order have been provided. An arrest warrant is not required. S.C. Code Ann. § 16-3-1300.

COPY GIVEN TO PLAINTIFF BY  (initials)

COPY GIVEN TO DEFENDANT BY  (initials)

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STATE OF SOUTH CAROLINA

COUNTY OF YORK

2025OR4610300055
CIVIL CASE NUMBER

IN THE MAGISTRATE'S COURT

SUMMONS
(RESTRaining ORDER)
(Harassment and Stalking)

Jacqueline Miller

PLAINTIFF(S)

DEFENDANT COPY

VS.

Johnny Earl Miller
1829 Paces River Ave # 106
Rock Hill, SC 29732

DEFENDANT(S)

TO: Johnny Miller :

The above named Plaintiff having filed a Petition for Restraining Order, copy attached:

YOU ARE HEREBY SUMMONED TO APPEAR before the:

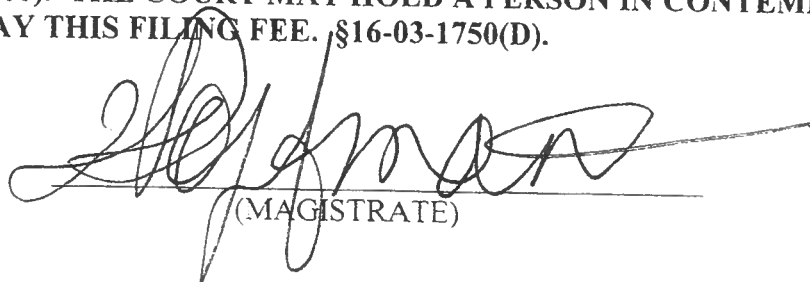
Catawba/Ebenezer Magistrate
1070 Heckle Blvd., Suite 2100
Rock Hill, SC

on July 23, 2025 at 3:30 PM to show cause why the Restraining Order prayed for by the Petitioner should not be granted.

IF YOU FAIL TO APPEAR, the relief prayed for by the Plaintiff may be granted.

NOTICE: THE NON-PREVAILING PARTY IN THIS ACTION IS ASSESSED A FILING FEE OF FIFTY-FIVE DOLLARS (\$55.00). THE COURT MAY HOLD A PERSON IN CONTEMPT OF COURT FOR FAILURE TO PAY THIS FILING FEE. §16-03-1750(D).

June 24, 2025


(MAGISTRATE)

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STATE OF SOUTH CAROLINA)

COUNTY OF York)

IN THE MAGISTRATES COURT

Jacqueline Miller)

PLAINTIFF(S)

VS.

Johnny Earl Miller)

DEFENDANT(S)

COMPLAINT AND MOTION
FOR RESTRAINING ORDER
(Harassment and Stalking)

SC25CR461030055
CIVIL CASE NUMBER

The Plaintiff alleges:

1. The Plaintiff lives in York County
2. The Defendant lives at 1824 Paces River Hwy #106 which is in Richland, SC 29132
3. The Harassment First or Second Degree or Stalking occurred in January 2023

4. Plaintiff further alleges that the following conduct occurred by the defendant on the times, dates, and places listed below, and such conduct falls within the definition of

- ☐ HARASSMENT, FIRST DEGREE (§ 16-3-1700 (A)), or
☐ HARASSMENT, SECOND DEGREE (§ 16-3-1700 (B)), or
☐ STALKING (§ 16-3-1700 (C)).

① June 4, 2025, at 1:30 O'clock, A.M. P.M. (circle one), at 150 Black Street, RH Police Dept which is in Rock Hill, SC, the conduct complained of occurred when the defendant:

- Asked her job to file a false Police Report
- Asked her job to pull up a false report
- False Police Report

② On June 24, 2025, at 1:00 O'clock, A.M. P.M. (circle one), at Black Street, RH Police Dept which is in Rock Hill, SC, the conduct complained of occurred when the defendant:

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On June 24, 2025, at 1:00 o'clock, A.M. P.M. (circle one) at Black St. Rock Hill Police Dept., which is in Rock Hill, SC, the conduct complained of occurred when the defendant: Came to my job insisting that he pick up a copy of the sealed police report that was false and unfounded.

(State details of harassment/stalking and other facts and circumstances upon which relief is sought above. Attach additional sheets if necessary.)

6 Plaintiff requests: (Check one or more)

- ☐ a. That the defendant be enjoined from abusing, threatening to abuse, or molesting the plaintiff or members of the plaintiff's family.
- ☒ b. That the defendant be enjoined from entering or attempting to enter the plaintiff's place of residence, employment, education, or other location.
- ☒ c. That the defendant be enjoined from communicating or attempting to communicate with the plaintiff in a way that would violate Article 17, Chapter 16 of the 1976 South Carolina Code of Laws, as amended.

SWORN to and Subscribed before me

This 24th day of June, 2025

[Signature]

Notary Public for South Carolina

My Commission expires 3-15-28

[Signature]
Signature of Plaintiff or Person Filing
on Behalf of Plaintiff

NOTICE: THE NON-PREVAILING PARTY IN THIS ACTION IS ASSESSED A FILING FEE OF FIFTY-FIVE DOLLARS (\$55.00). THE COURT MAY HOLD A PERSON IN CONTEMPT OF COURT FOR FAILURE TO PAY THIS FILING FEE. §16-03-170(D).

NOTICE TO DEFENDANT: YOU HAVE THE RIGHT TO EMPLOY COUNSEL TO REPRESENT YOU.

STATE OF SOUTH CAROLINA
COUNTY OF YORK

Jacqueline Miller
Plaintiff,

Vs.

Johnny Earl Miller
Defendant.

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IN THE MAGISTRATE COURT

**DEFENDANT'S ANSWER TO THE
RESTRAINING ORDER REQUEST**

CIVIL CASE NUMBER
2025OR4610300055

INCREDIBLY CORRUPT....and....OUTRAGEOUSLY BOGUS!!!!

Respectfully speaking, as the Defendant has repeatedly said in many previous court filings related to this bogus request by the Plaintiff, Jacqueline Miller, for a restraining order against the Defendant....the above two phrases are about the best the Defendant, Johnny E. Miller, can come up with to describe the behavior of Jacqueline Miller, The City of Rock Hill, and other York County judiciaries and administrators involved in this and related legal cases.....incredibly corrupt and outrageously bogus. The Plaintiff's request for a restraining order against the Defendant should absolutely be denied for the following reasons:

- 1) All related charges and legal matters against the Defendant based on the initial charge of harassment_2nd degree in the Municipal Court of Rock Hill, SC (2023A4620300966) from which this immediate request for a restraining order arises are 100% false and outrageously bogus. The Defendant has presented an overwhelming amount of evidence in various legal venues in York County, South Carolina which clearly supports that the charge of harassment_2nd degree and related charges are completely unfounded.
- 2) The Plaintiff in this matter and the alleged victim of the said harassment charge is Jacqueline Miller, an employee of the Rock Hill Police Department. Jacqueline Miller is also the Defendant's ex-wife via a very bitter divorce that was granted in December of 2022 after 42 years of marriage. The Plaintiff, the prosecuting attorney, the previous presiding judges before Judge Hoffmann, the arresting officer, the investigator, and the Rock Hill Chief of Police who has steadfastly upheld Jacqueline Miller in her wrongdoings ALL work for the City of Rock Hill and all are white

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except the Plaintiff who is black. Racism is involved here. This is a travesty of justice within itself. Furthermore, the current presiding judge over the said harassment case in the Rock Hill Municipal Court is the Honorable Telisha Hoffmann. Judge Hoffman is also the judge in this immediate court who signed the summons on the behalf of the Plaintiff for the Defendant to appear in court to answer to this bogus matter of a restraining order being sought against him. Judge Hoffmann signed the said summons while having all of the evidence included in this immediate answer before her, which is also in the MOTION TO DISMISS which is currently pending in the Rock Hill Municipal Court concerning the harassment charge. To reiterate, Judge Hoffmann is currently presiding over the said harassment case in the Rock Hill Municipal Court. AMAZING.

3) This immediate answer includes the following attachments:

- Seven (7) police reports made by the Defendant, Johnny Miller, against the Plaintiff, Jacqueline Miller, ranging from July 2021 until June 2025.
- A "Request For Action" petition against the Plaintiff signed by 18 concerned citizens.
- Nine (9) affidavits from concerned citizens who testify of the Plaintiff's outrageous behavior in the affidavits.
- A previous summons in this same court venue wherein the Plaintiff sought a restraining order against the Defendant that was denied by the Honorable Judge Cousins on June 20, 2023...over 2 years ago. Judge Cousin's Order is also included after the summons.

These attached documents are self-explanatory if read, yet the York County judiciaries, and law enforcement agencies have taken absolutely no action against the Plaintiff that the Defendant is aware to protect him from her vicious stalking and harassment. To the contrary....as the Defendant has stated in many previous court filings....the York County authorities aid and abet her by their actions, and in essence are harassing the Defendant themselves. The Defendant has filed five (5) Citizen Complaints against the City of Rock Hill....one is pending and the other four were determined to be UNFOUNDED. AMAZING. In the Defendants

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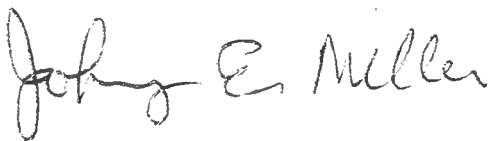
understanding of the matter, these are criminal and sinful actions by Jacqueline Miller and the York County authorities.

- 4) Obstruction of justice, false imprisonment, civil and criminal defamation of character, violation of right to a speedy and public trial, fraud by illegally taking the marital home from the Defendant via illegal tactics and bogus court rulings are just a few of the crimes and wrongdoings that the Plaintiff and York County authorities have teamed together to perpetrate on the Defendant.

In closing, as an authentic Christian, the Defendant loves and forgives Jacqueline Miller, the Rock Hill Police Department, York County judiciaries and authorities, and all others who have wrongfully persecuted him in these bogus matters. The Defendant simply desires for love, peace, righteousness, and justice to prevail. Hate kills. The hate must stop. By God's grace, the Defendant is the change he desires to see in the Rock Hill community and in the World. Rock Hill is home.

FOR THE FOREGOING REASONS, and many others that this Most Honorable Court is probably aware of, the Plaintiff's request for a restraining order should absolutely be denied.

Prayerfully submitted,



Johnny E. Miller
Defendant (Pro Se)

~~July 29, 2025~~

June 29, 2025

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STATE OF SOUTH CAROLINA
CITY OF ROCK HILL

The State of South Carolina

vs.

Johnny Earl Miller
Defendant

RECEIVED

Jan 12 2026
IN THE MUNICIPAL COURT
SC Court of Appeals

MOTION TO DISMISS

Warrant No. 2023-A-46203-00966

Due to the following reasons stated herein, and others that are not listed, the Defendant, Johnny E. Miller, hereby respectfully and humbly moves this Honorable Court to dismiss the harassment_2nd degree charge that was originally filed on April 21, 2023 (arrest made on April 23, 2023) and recently restored via an Order stamped filed February 21, 2025 issued by the Honorable Judge Jane Pittman Modla via a hearing held on February 11, 2025. (see exhibit 2)

The said Order (Two Orders) that restores the charges erroneously gives the date that I, the Defendant, requested a jury trial as 12/15/2023 (see 2nd page of Two Orders, 1st paragraph). This is absolutely false. I, the Defendant, was initially arrested on April 23, 2023. The very first time I appeared in court at arraignment *pro se* on the bogus charge of harassment shortly after the arrest, I pleaded not guilty and requested a jury trial before the Honorable Judge Modla. My bond was fraudulently and maliciously revoked, and I was falsely imprisoned. I was released from jail after State Representative Tommy Pope referred me to Attorney Leland Greely. After Attorney Greeley got me out of jail in the 2nd bond revocation hearing before Judge Anthony Triano, Attorney Leland Greely then represented me in this court before deceased judge Peter Lenzi on a 100% bogus contempt-of-court charge for "violating" a no-contact order against my ex-wife, wherein Attorney Greeley again requested a jury trial. I have the recording of the hearing where Attorney Greeley requested a jury trial. All of this took place well before December 15, 2023 (12/15/2023).

The judgments in this case by this Honorable Court are based solely on the testimony of a vindictive employee of The City of Rock Hill which is contrary to the overwhelming amount of evidence that Jackie Miller's testimony is completely fabricated and bogus, and that The City of Rock Hill is utterly corrupt... especially

STATE OF SOUTH CAROLINA
CITY OF ROCK HILL

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IN THE MUNICIPAL COURT

The State of South Carolina

MOTION TO DISMISS

vs.

Johnny Earl Miller
Defendant

Warrant No. 2023-A-46203-00966

Due to the following reasons stated herein, and others that are not listed, the Defendant, Johnny E. Miller, hereby respectfully and humbly moves this Honorable Court to dismiss the harassment 2nd degree charge that was originally filed on April 21, 2023 (arrest made on April 23, 2023) and recently restored via an Order stamped filed February 21, 2025 issued by the Honorable Judge Jane Pittman Modla via a hearing held on February 11, 2025. (see exhibit 2)

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Police Chief Chris Watts, Assistant Solicitor Ben Shealy, and deceased Judge Peter Lenzi. Absolutely incredible!

Index Of Exhibits

- 1) Arrest log for the Defendant
- 2) Original arrest warrant
- 3) Emails with Ms. Jackie Brown Miller (10 pages)
- 4) Catawba/Ebenezer Magistrate Court Restraining Order Summons (6 pages)
- 5) Order Denying Catawba/Ebenezer Magistrate Court Restraining Order
- 6) Peter Lenzi letter dated October 31, 2023 wherein he admits he lied
- 7) Defendant's letter to Attorney Greely saying Peter Lenzi lied (3 pages)
- 8) Contempt of court log received through Freedom Of Information Act (2 pages)
- 9) Ben Shealy Nolle Pros letter to Jack Swerling
- 10) Defendant affidavit in response to Shealy Nolle Pros letter (3 pages)
- 11) Defendant's Answer to bogus harassment charges (4/28/2023) (10 pages)
- 12) Supplemental Filing To Defendant's Answer (5/8/2023) (13 pages)
- 13) Supplemental Filing # 2 (5/10/2023) (3 pages)
- 14) Peter Lenzi & Ben Shealy Motion To Revoke Bond (2 pages) (6/6/2023)
- 15) Defendant's Answer To Motion To Revoke Bond (6 pages) (6/8/2023)
- 16) Defendant's email to Chief Chris Watts and others (5 pages) (3/12/2022)
- 17) Defendant's email to Chief Chris Watts and others (10 pages) (4/7/2023)
- 18) Email from Chief Chris Watts to Defendant (5/16/2022)
- 19) Defendant's YC Sheriff's Office Report against Ms. Jackie Miller (8/6/2021)
- 20) Defendant's City of RH Police report against Jackie Miller (8/4/2021)
- 21) Defendant's City of RH Police report against Jackie Miller (8/22/2022)
- 22) Defendant's YC Sheriff's Office Report against Ms. Jackie Miller (8/13/2022)
- 23) Defendant's YC Sheriff's Office Report against Ms. Jackie Miller (8/28/2022)
- 24) Defendant's YC Sheriff's Office Report against Ms. Jackie Miller (9/11/2022)
- 25) Stalking Report Captain Neely_Sheriff's Office (5 pages) (9/26/2022)
- 26) Peter Lenzi's contempt-of-court Order to incarcerate Defendant (11/19/2023)
- 27) Attorney Jane Randall's Motion For Appeal Bond (2 pages) 11/22/2023
- 28) Motion To Restore (2 pages) (12/23/2024)
- 29) Swerling's/Defendant's Response To Motion To Restore (1/13/2025)
- 30) Defendant's Responsive Affidavit To Motion To Restore (1/3/2025) (4 pages)
- 31) Time Served email from Ms. Shantay Greer to Attorney Jane Randall
- 32) Jackie Miller's affidavit (8/3/2021) (5 pages)
- 33) A Petition, affidavits and letters against Jacqueline Miller for harassment and stalking (29 pages)
- 34) Letter to Congressman Ralph Norman from Ms. Jerrienne Jackson (2 pages)
- 35) Letter to Mayor Gettys and City Council from Defendant (7 pages) (2/26/2024)
- 36) Letter to Mayor Gettys and City Council from Defendant (2 pages) (3/7/2024)

- 1) As a Christian, the Defendant loves and forgives everyone involved, especially all parties opposing the Defendant in this matter.
- 2) The Defendant is a black man born, raised, and living in the United States of America in South Carolina, in the city of Rock Hill wherein the city's white Police Chief (Chris Watts), a white Municipal Court Judge (Peter Lenzi), a white Assistant Solicitor (Ben Shealy), and the Defendant's bitter vindictive ex-wife Jacqueline Brown Miller (aka Miss. Jackie....who the defendant was married to for 42 years) all work for the City of Rock Hill. The evidence in this matter, some of which is contained in this immediate Motion, clearly indicates that the aforementioned employers of the City of Rock Hill were and are in cahoots with one another to wrongfully and maliciously destroy the Defendant by falsely imprisoning him on 100% bogus charges in an attempt to give the appearance of vindication for themselves for all the corrupt and illegal activities they have perpetuated against the Defendant using taxpayers money to do so. Bryan Stevenson, a Harvard graduate, scholar, attorney, and current civil rights activist states; "Slavery didn't end in 1865. It just evolved."
- 3) The Defendant respects and honors positions of authority and governmental officials, however the overwhelming proportion of sustained corruption perpetuated against the Defendant in this matter by The City of Rock Hill is something that is found in the movies and on TV in crime dramas. This is especially true concerning Police Chief Chris Watts, deceased Municipal Court Judge Peter Lenzi, and Assistant City Solicitor Benjamin Shealy. These three men in my opinion are hired hit-men who assassinate anyone's character and/or imprison all who would dare stand for righteousness and justice against their evil regime.
- 4) In my opinion, my beloved and honorable attorney in this matter, the distinguished Jack Swerling, has provided me with inadequate representation, therefore I am compelled to submit filings such as this myself. It is documented earlier in this matter that I attempted to have the \$35,000.00 (thirty-five thousand dollars) that I paid Mr. Swerling for representation returned to me after I learned of certain health issues, but he refused, and here we are today. Attorney Swerling has been a far greater help to The City of Rock Hill and the prosecution, than he has to me his client. In my opinion, he has been a failure as my attorney. But I forgive him, and I still love him.
- 5) The City's judgment to restore charges against the Defendant that were filed against him almost 2 years ago (April 23, 2023) is nothing short of a crime, and is part of an elaborate calculated corrupt scheme to deny the Defendant his civil

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rights by falsely imprisoning him for 40 days and denying him his right to a speedy trial as afforded him by the sixth amendment of The Constitution of The United States. The Defendant has always maintained his complete innocence in this matter against the City's bogus allegations and charges. As previously stated, the Defendant asked for a jury trial from the very beginning as a *pro se* Defendant, and then again when he was represented by Attorney Leland Greeley. But the City refused to give the Defendant a speedy trial, and instead perpetuated the evil scheme of Nolle Pros with the right to restore for 18 months in an effort to buy time to destroy and fabricate evidence, and to get their ducks in a row knowing that the Defendant was going to sue them. The corrupt scheme of Nolle Pros for 18 months gave The City of Rock Hill time to get rid of those who would be a liability to them, and instruct others of the lies to tell to correspond with the lies they had already told, were going to tell, and are currently telling. The City of Rock Hill also knows that over a period of time witnesses forget things, and jurors are not as easily convinced concerning things testified about that happened long ago. They were hoping that the Defendant would forget things in the 18 months, not keep documentation of their crimes, and eventually give-up as a financially ruined, disgraced, angry black man. However, there scheme didn't work, and by God's grace, it's not going to work. The City's actions in this matter is a page taken right out of the Jim Crow era where black people were falsely accused, unjustly fired from their jobs, falsely imprisoned by white oppressors, and their property illegally confiscated from them...all the time prolonging the justice process to destroy the black person via financial ruin because he or she would dare stand for justice in the face of racial injustice. The City's actions against the Defendant is tantamount to modern day slavery and a lynching. The City of Rock Hill also clearly knew that Attorney Swerling was more helpful to the city and the prosecution than he was to his client, the Defendant.

6)The City's evil scheme of refusing to give the Defendant a speedy trial and Nolle Prosing the matter for 18 months was also designed to give his ex-wife (Jacqueline "Miss Jackie" Brown Miller) time to conjure up more lies and allegations as found in the Motion To Restore, because they clearly understood that there was absolutely zero credibility in the initial bogus charges of harassment concerning Jacqueline Miller being copied on emails (see exhibit 2). The arrest warrant states that the Defendant copied Ms. Jackie Miller on emails after Ms. Miller had asked him not to contact her anymore on March 30, 2023 (3/30/2023). The Defendant was charged with harassment for copying Ms. Jackie Miller on business emails after March 30, 2023...emails which were legitimately required by the pending divorce. However, the evidence clearly indicates that Ms. Jackie Miller copied the Defendant herself on emails AFTER March 30, 2023 (3/30/2023) (see exhibit 3). The City of Rock Hill knew from the very beginning that these charges and

allegations were bogus, yet deliberately, intentionally, and maliciously proceeded to falsely imprison the Defendant repeatedly (see exhibits 1, 11, 15-18). The City of Rock Hill wanted to give Jacqueline Miller 18 more months to harass and provoke the Defendant in hopes that he would react wrongfully or illegally. The City of Rock Hill helped and encouraged Jacqueline Miller in her evil actions for reasons well documented in this matter. The City of Rock Hill put a target on the Defendant's back for his ex-wife, armed her with a weapon, and declared open-season on the Defendant and his associates for his ex-wife (see exhibits 19-25 and 33). She was given full reign to harass and stalk the Defendant and his associates, but according to Judge Modla's Order, the Defendant was simply to "walk away" from the harassment and stalking, because the Court has "jurisdiction" (slavery) over the Defendant, but not over his ex-wife (see page 5, last paragraph in Two Orders). This is totally unjust, not to mention insane logic. However, by God's grace, the Defendant did not become "the angry black man" that The City of Rock Hill wanted him to become and return the harassment and stalking to his ex-wife Ms. Jackie Miller, but instead ignored her illegal actions. Every allegation listed in the said Motion To Restore is 100% false. My attorney, Jack Swerling, said this much himself in his response to the said motion (see exhibit 29).

7) In yet another clear indicator of The City of Rock Hill's utter corruption in this matter, Ms. Jackie Miller sought a restraining order against the Defendant by filing a motion in York County at the Catawba/Ebenezer Magistrate's Office for "harassment and stalking." The motion was denied, and the complaint was dismissed by the York County Judge (see exhibits 4 and 5). Yet, Ms. Jackie's buddies at the City of Rock Hill repeatedly incarcerated the Defendant for the same actions that were dismissed by the Catawba/Ebenezer Magistrate. Amazingly corrupt.

8) Jacqueline Miller has repeatedly contacted and harassed members of the church that the Respondent/Defendant shepherds, including children (see exhibit 33).

9) The Defendant filed numerous legitimate complaints and police reports against his ex-wife Jacqueline Miller for harassment and abuse, including one for stalking when she came to his apartment and videoed him and a guest while she (Jacqueline Miller) had a restraining order against her not to come near the Defendant. All of the complaints and police reports filed by the Defendant were ignored over and over again by The City of Rock Hill Police, and no action was taken to protect the Defendant from his evil vindictive ex-wife (see exhibits 16-25). Jacqueline Miller works for the Rock Hill Police Department, and she knew her co-workers, especially Chief Chris Watts, were going to support, uphold, and encourage her in her wrongdoings. They know each other well. Yet, Jacqueline Miller's 100%

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bogus allegations have led to the Defendant being falsely imprisoned multiple times for a total of 40 (forty) days, fired from his job, defamed, and being defrauded out of his home which was illegally sold to white people. This is all part of the City's evil scheme to provoke the Defendant into doing something illegal in response to their illegal antics. What the City of Rock Hill and the Rock Hill Police have perpetuated and are perpetuating against the Defendant is police brutality...an extreme abuse of authority on the oppressed....a black man in the "United" States of America.

10) All of this corruption by the City of Rock Hill is funded by taxpayers. As I've stated previously in filings in this matter, the RICO Act should apply to municipalities that behave in such manners. Higher governmental and judicial authorities and courts must hold these organizations accountable, and send a strong message to municipalities that choose to go down this path. This Municipal Court of Rock Hill with its immediate ruling enables and abets the corrupt actions of The City of Rock Hill to continue. It is clear that The City of Rock Hill cannot and will not justly police and rule itself. United States Congressman Ralph Norman visited the Defendant while I was falsely incarcerated at The Moss Justice Center. Congressman Norman looked me in my eyes and said; "Ub-be-lievable.....Johnny, someone has to be held accountable for this" (see exhibit 34). The Defendant is grateful that Congressman Norman referred him to Attorney Jane Randall who was able to get the Defendant out of jail for the 3rd time (see exhibit 27). State Representative Tommy Pope also visited the Defendant while I was falsely incarcerated at The Moss Justice Center....on the same day as Congressman Norman.

11) Jacqueline Miller has stated in writing that Chief Chris Watts (her boss) does not take the allegations and police reports of the Defendant seriously (see first paragraph, page 3 of exhibit 32). Ms. Jackie Miller states; "even though my Captain assured me that it wasn't given any credence, it still made me feel uncomfortable at work." And then again on page 4 of exhibit 32, third from the last paragraph, Ms. Jackie Miller speaking of the Defendant states; "Although no one is taking him seriously, it is still my reputation that he is trying to ruin." Outrageous! Chief Chris Watts denied knowing anything about these statements of Ms. Miller in this regard (see exhibit 18). Chief Watts also put in writing that there was no record of a telephone call to the Rock Hill Police Station from the Defendant (who was in Kentucky at the time) about a white female and Rock Hill Police Officer being caught on camera at the Defendant's apartment door at 5 AM (see all of exhibit 17, especially top of 4th page). The Chief suggested possibly that the Defendant may have called 911 and was talking to a 911 dispatcher, even though I told him clearly that I was in Kentucky and had the Rock Hill Police Department

number saved in my cell phone. Had I dialed 911 in Kentucky, I would have reached the authorities in Kentucky....not in Rock Hill. However, later it was acknowledged by Rock Hill Police that the said phone call from the Defendant was indeed recorded by the Rock Hill Police Department, but only after the Defendant filed a Citizen's Complaint. During a meeting with the Citizen Review Board (CRB), it was revealed to the Defendant that his phone call made from Kentucky had been "found."

12) Judge Peter Lenzi made a very incriminating false statement in court while presiding over this matter that he admitted to in a written statement (see exhibits 6 and 7). The reason Judge Lenzi lied is because he knew that Judge Triano (not himself) presided over my bond hearing (not Judge Lenzi as he lied about), and therefore Judge Triano gave the instructions for the no-contact order, and it would therefore be Judge Triano who would have to charge me with contempt-of-court if the violation occurred....which it didn't. It was just another bogus, trumped-up, corrupt charge. In addition, Judge Lenzi was in cahoots with Ben Shealy to lie about the matter as evidenced by Ben Shealy incorrectly and falsely arguing in court before Judge Lenzi that the hearing that Attorney Greely represented me in with Judge Toriano presiding was a contempt-of-court hearing.....not a bond revocation hearing. Shealy is recorded vehemently making this false argument which was proven to be false by the record. This is why Shealy lied in exhibit 9 about the City of Rock Hill having charged me with TWO contempt of courts, when in actuality it is only ONE....and that ONE is bogus. Utter corruption. Very sad.

13) As stated in paragraph 12 above, Assistant Attorney Solicitor Ben Shealy intentionally made a very incriminating false statement in a written statement about me, the Defendant, being charged by the City of Rock Hill with two contempt of courts see exhibits 9 and 10). He did this to have me fired from my job as a public school teacher, to have me falsely imprisoned repeatedly, and to defame me among his other corrupt motives by having two automatic convictions on my record. Contempt-of-court charges are slave charges because they carry an automatic conviction. For a certain time period, which no doubt is indicative of a much larger or perhaps the entire contempt-of-court populated data...Judge Lenzi by far had more contempt-of-courts than any other City of Rock Hill Municipal judge (see exhibit 8).

14) As stated earlier in this document, civil rights advocate, attorney, scholar, and Harvard graduate Bryan Stevenson states; "Slavery didn't end in 1865. It just evolved."

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15) Nelson Mandela served 27 years in prison, split between Robben Island, Pollsmoor Prison, and Victor Verster Prison. Amid growing domestic and international pressure and fears of racial civil war, President F. W. de Klerk released him in 1990.

16) Shortly after 6 p.m. on April 4, 1968, Dr. Martin Luther King Jr. was shot and mortally wounded as he stood on the second-floor balcony outside his room at the Lorraine Motel in Memphis, Tenn. He was pronounced dead at 7:05 p.m. at St. Joseph's hospital. Although Dr. King's moral life was not pristine in a certain context (like Ghandi's), he was still a beacon for civil rights and justice for the entire World.

17) Where great men like Martin Luther King, Ghandi, and Nelson Mandela fell short, Jesus of Nazareth did not.

18) We must fight with our lives for our civil rights, justice, and equality. **I'D MUCH RATHER DIE THAN TO BE A SLAVE.**

19) This matter concerns Rock Hill Municipal Court Case # 2023-A-46203-00966. The case number in this matter has been transcribed incorrectly numerous times throughout this matter (off by a number or two), but 2023-A-46203-00966 is the case number that is on the arrest warrant. The arrest warrant is Exhibit 2.

20) To reiterate, the City of Rock Hill has maliciously and fraudulently judged against me in a hearing that was held on February 11, 2025. After well-over a year, the City has restored the 100% bogus charge of harassment_2nd degree against me for harassing my ex-wife who of course works for the Rock Hill Police Department. In my opinion, this is modern day slavery and a modern day lynching in accordance to what civil rights advocate, attorney, scholar, and Harvard graduate Bryan Stevenson states; "Slavery didn't end in 1865. It just evolved."

21) You absolutely don't have to be an attorney to see and understand that this is municipal corruption at a very high level, if not the highest level.....you just have to be able to read and think for yourself. The Defendant is a 100% innocent black man who this corrupt municipality snatched out of society, falsely imprisoned for 40 days, attempted to destroy his careers as a Christian minister and public school teacher, dishonored his military service to our country wherein he honorably served in the United States Air Force, violated his civil rights according to the sixth amendment of the United States Constitution by not granting him a speedy trial, and defrauded him out his home which was illegally sold to white folks.....all based on the outrageous and malicious lies of the Defendant's vindictive ex-wife,

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Ms. Jackie Brown Miller. The actions of the City of Rock Hill are incredibly outrageous and completely bogus.....and they continue to be consistent and persistent in their evil ways up to this very day in their attempt to destroy the Defendant. Yet, the Defendant, I Johnny E. Miller, forgive and still loves The City of Rock Hill and its administrators, even though they are corrupt. This is to be like Jesus.

22) I love Rock Hill...this is home. We need to do right, and come together. By God's grace as an authentic Christian, I am not prejudiced nor biased against any race of people. Specifically in this matter, I love white people, and I am not prejudiced nor biased against them. The history of the United States is clear on race issues to all who are not blind. I simply want justice. No Room For Racism.

23) The Defendant has perfect peace about his matter, regardless of what happens. God is ultimately in control.

24) May God bless the United States of America, and have mercy on us all.

1 John 4:18 (KJV)

There is no fear in love; but perfect love casteth out fear: because fear hath torment. He that feareth is not made perfect in love.

Isaiah 26:3 (KJV)

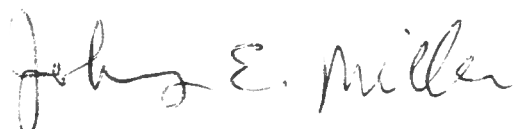
Thou wilt keep him in perfect peace, whose mind is stayed on thee: because he trusteth in thee.

Again, I love and forgive all who wickedly oppose me, and who lie on me out of their own self-interest.

For reasons stated herein and others, I respectfully ask that the charges against me be dismissed. Thank you.

In God we trust.

Sincerely, truthfully, and humbly submitted,



Johnny E. Miller

Defendant

February 27, 2025

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STATE OF SOUTH CAROLINA
COUNTY OF YORK

Jacqueline Miller
Plaintiff,

Vs.

Johnny Earl Miller
Defendant.

IN THE MAGISTRATE COURT

**MOTION TO DISMISS AND/OR
REVOKE RESTRAINING ORDER**

CIVIL CASE NUMBER
2025OR4610300055

I, Johnny E. Miller, the Defendant in this matter, hereby move this Honorable Court to dismiss and/or revoke the restraining order against him granted to his ex-wife, the Plaintiff, in this court on July 24, 2025. The restraining order should be dismissed and/or revoked for the following reasons:

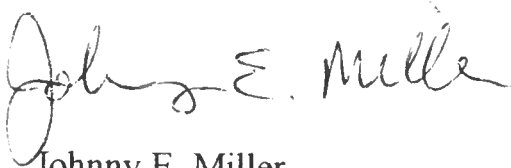
- 1) The Defendant was informed by this Court on yesterday August 7, 2025 that due to a "technical error" a transcript of the said restraining order hearing does not exist and never will exist. Therefore, there is no record on which to grant the bogus restraining order, nor is there a record to appeal the bogus restraining order from.
- 2) The Plaintiff's request for the restraining order is and was 100% bogus in nature as was clearly indicated based on the testimonies and evidence presented at the July 24, 2025 hearing for which a record does not exist, and on the hundreds if not thousands of pages of documentation submitted in related court matters. To the contrary, the testimonies and evidence from the hearing that has no record clearly indicated that it was the Plaintiff, Jacqueline Miller, who has a pattern of harassing behavior against the Defendant. The evidence at the said hearing clearly indicated that the Plaintiff is supported by the Rock Hill Police Department and other York County judiciary officials in harassing the Defendant, which in essence means that the Rock Hill Police Department and other judiciary officials as figures of authority are indeed harassing the Defendant themselves by encouraging the Plaintiff's harassment and blatant lies against the Defendant by supporting her in her evil actions.

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- 3) The Defendant believes that very strong evidence exists that this Honorable Court is in cahoots with other York County judicial officials and law enforcement agencies to falsely accuse and convict him of crimes he did not commit, to harass him, to ruin him financially, to deprive him of his legally owned property, and in short to destroy his life as a 100% innocent man.

FOR THE FOREGOING REASONS and others not mentioned, this Honorable Court should dismiss and/or revoke the restraining order against the Defendant, Johnny E. Miller, granted to his ex-wife, the Plaintiff in this court on July 24, 2025.

Prayerfully submitted,

A handwritten signature in black ink that reads "Johnny E. Miller". The signature is written in a cursive, flowing style.

Johnny E. Miller
Defendant (Pro Se)
August 8, 2025

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STATE OF SOUTH CAROLINA
COUNTY OF YORK

Jacqueline Miller
Plaintiff,

Vs.

Johnny Earl Miller
Defendant.

IN THE MAGISTRATE COURT

**AMENDED MOTION TO DISMISS
AND/OR REVOKE
RESTRAINING ORDER**

CIVIL CASE NUMBER
2025OR4610300055

I, Johnny E. Miller, the Defendant in this matter, hereby files an amendment to a previous motion filed on August 8, 2025 with this court requesting that the restraining order against him granted to his ex-wife, the Plaintiff, in this court on July 24, 2025 be dismissed and/or revoked. The Defendant has received a summons to appear before this court on October 8, 2025 at 11:00 AM to hear the motion for the restraining order to be dismissed and/or revoked. The restraining order should be dismissed and/or revoked for the following reasons:

- 1) The Defendant has been found **NOT GUILTY** of harassment towards the Plaintiff by a jury in a trial that took place on September 10, 2025. The restraining order that the Defendant is seeking to have dismissed and/or revoked was generated and/or precipitated chiefly from the said harassment charge. Please see the attached **Statement of Case Disposition**.
- 2) The Defendant was informed by this Court on August 7, 2025 that due to a "technical error" a transcript of the said restraining order hearing does not exist and never will exist. Therefore, there is no record on which to grant the bogus restraining order, nor is there a record to appeal the bogus restraining order from.
- 3) The Plaintiff's request for the restraining order is and was 100% bogus in nature as was clearly indicated based on the testimonies and evidence presented at the July 24, 2025 hearing for which a record does not exist, and on the hundreds if not thousands of pages of documentation submitted in related court matters. To the contrary, the testimonies and evidence from the

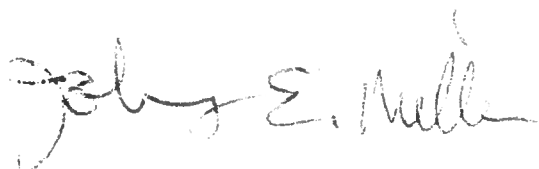
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hearing that has no record clearly indicated that it was the Plaintiff, Jacqueline Miller, who has a pattern of harassing behavior against the Defendant. The evidence at the said hearing clearly indicated that the Plaintiff is supported by the Rock Hill Police Department and other York County judiciary officials in harassing the Defendant, which in essence means that the Rock Hill Police Department and other judiciary officials as figures of authority are indeed harassing the Defendant themselves by encouraging the Plaintiff's harassment and blatant lies against the Defendant by supporting her in her evil actions.

- 4) The Defendant believes that very strong evidence exists that this Honorable Court is in cahoots with other York County judicial officials and law enforcement agencies to falsely accuse and convict him of crimes he did not commit, to harass him, to ruin him financially, to deprive him of his legally owned property, and in short to destroy his life as a 100% innocent man.

FOR THE FOREGOING REASONS and others not mentioned, this Honorable Court should dismiss and/or revoke the restraining order against the Defendant, Johnny E. Miller, granted to his ex-wife, the Plaintiff in this court via a hearing on July 24, 2025.

Prayerfully submitted,



Johnny E. Miller
Defendant (Pro Se)
October 1, 2025

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STATE OF SOUTH CAROLINA
COUNTY OF YORK

Johnny E. Miller
Appellant

vs.

Jacqueline Miller

Respondent

IN THE CIRCUIT COURT
OF COMMON PLEAS

Case No. 2025CP4604122

EMERGENCY MOTION FOR INJUNCTION
TO QUASH RESTRAINING ORDER
PENDING THE APPEAL

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The appellant, Johnny E. Miller, hereby moves this most honorable Court to quash the restraining order that is currently in place against him pending the outcome of the appeal of the said order that is presently pending before this great Court for the following reasons:

- 1) Everything about the restraining order against the appellant is bogus. The appellant has never harassed or stalked his ex-wife, the respondent Jacqueline Miller, in his or her entire lives. The restraining order was granted solely and entirely on the testimony of the respondent without a recording or transcript of record in existence for the hearing in which the restraining order was granted, nor any credible evidence whatsoever. On the other hand, a tremendous amount of evidence exists in support of the appellant's position in this matter, including multiple police reports, videos, numerous credible affidavits of professional individuals who the respondent herself has repeatedly harassed, a petition for action signed by eighteen (18) people seeking help from the York County authorities to put a stop to the respondent's harassment of them, and hundreds (possibly thousands by now) of pages of legal documents filed by the appellant in numerous court hearings and legal matters all stemming from the lies of the respondent. To make matters worse, the respondent's lies and bogus allegations are fully supported by the Rock Hill Police Department (who employs the respondent) and a corrupt York County Judicial System that has repeatedly issued unjust and irrational rulings against the appellant over the past four (4) plus years to protect the York County law enforcement authorities and judiciaries (most notably the Rock Hill Police Department) from liability of a law suit by the appellant due to being falsely imprisoned for a total of forty

(40) days in four (4) different bogus arrests, and having his civil rights repeatedly violated. The respondent's lies, false allegations, and unjust actions stem from a very contentious divorce between the respondent and the appellant after forty-two (42) years of marriage. The record in all the various legal procedures and hearings in the past years, including this immediate one, indicate that there are absolutely no legal grounds for a restraining order to be issued against the appellant. He has never stalked, harassed, threatened, or taken any other action towards the respondent that would remotely come close to legally justifying a restraining order against him. To the contrary, there is a wealth of evidence to clearly show that the respondent Jacqueline Miller, the Rock Hill Police Department, and other York County authorities have among other violations intentionally harassed, threatened, and incarcerated the appellant, and severely maligned his character to the extent he was involuntarily terminated from his job as a public 6th-grade school teacher. The actions in this matter of the respondent, the Rock Hill Police Department, and other York County judiciaries are outrageous, and constitute modern-day slavery as civil rights attorney, professor, and Harvard graduate Bryan Stevenson infers when he states; "Slavery didn't end in 1865, it just evolved."

- 2) As stated in the said appeal presently pending before this great Court, the respondent and the York County authorities are using tactics from the Jim Crow era in an attempt to destroy the appellant. Their plan is to falsely charge him with bogus crimes, cut-off his source of income where he has no means to support himself and afford legal counsel, and prolong the legal process as long as possible, because the appellant is severally crippled to protect himself under these circumstances (just like a slave), and the York County authorities have an endless amount of financial resources to perpetuate their crimes because they're using tax-payers' money to carry-out their corruption against the appellant. In the United States of America a human being doesn't have to do anything to be treated as a slave except be black. History has proven this. The appellant hasn't done anything to be treated like he's being treated except be black. All of the appellant's oppressors are white...except for the respondent. I know this sounds rough, but it's the absolute truth in the appellant's mind, and in the mind of many others who think similar to Attorney Bryan Stevenson and Professor Robin DiAngelo on matters of this nature. I apologize if it's offensive, but the truth is always offensive to someone. Jesus knew this, and directly said it or inferred it in Scripture depending on one's interpretation.

3) The appellant could resubmit some or all of the documents that have been filed in the various related legal matters to this immediate case that greatly support, and in the appellant's opinion, clearly show what decision should be rendered in this matter that justice should prevail, but for various reasons, it's not feasible. The appellant will instead just list the legal venues and case numbers of related matters to this immediate appeal, all directly involving false allegations by the respondent against the appellant. The appellant believes that this most honorable court has the authority to research and access any documents it desires in any of these cases. The cases are as follows:

- 1) Rock Hill Municipal Court.....Case No. 2023-A-4620300966
- 2) York County Family Court....Case No. 2021-DR-4601352
- 3) York County Family Court....Case No. 2021-DR-4601461
- 4) South Carolina Court of Appeals....Case No. 2021-000824
- 5) South Carolina Court of Appeals....Case No. 2023-000190
- 6) South Carolina Court of Appeals....Case No. 2023-001133
- 7) South Carolina Court of Appeals....Case No. 2023-001315
- 8) York County Circuit CourtCase No. 2023CP4603767
- 9) York County Circuit CourtCase No. 2025CP4600901

There are other legal cases in the State of North Carolina that the appellant is a party to because of unjustly being fired from his job as a teacher in Charlotte Mecklenburg Schools due to the false allegations and bogus arrests leveled at him by York County, SC authorities, but those cases will not be listed here. The appellant believes that the evidence in this matter is crystal clear that the restraining order should be quashed, but he's not an attorney, and he's not the Judge who will be making the decision. Ultimately, the appellant depends on God through Jesus Christ for the final outcome. As stated and proven by documentation in the immediate appeal, the appellant has been found NOT GUILTY of harassing the respondent by a jury of his peers. However, just as a slave, there's absolutely nothing the appellant can do if the York County judiciaries and Powers That Be are undeterred by the NOT GUILTY verdict, and desire to continue harassing and falsely accusing him and violating his freedom by putting a restraining order on him...no more than a slave could do anything about his master putting a restraining order on the slave. A master owns his slave. The slave is chattel. On a more gracious note, Jesus was found GUILTY by His peers, was treated like a slave, but everything eventually turned out alright for Him. The appellant takes complete solace in this indisputable fact...indisputable that is...in the mind of the appellant.

- 4) If this most honorable Court does not grant the injunction to quash the restraining order pending the outcome of the appeal, the unjust system's plan will continue to be operating in full effect by having a bulls-eye target on the appellant for any law enforcement agency in the United States to take aim at on the whim of another one of the respondent's lies, and have the appellant arrested again. The restraining order was set for an entire year....until July 24, 2026. The oppressors know how slowly appellate case move through the system, and this is all part of their plan. The appellant currently has at least three appellate cases that have been pending for over two (2) years. The appellant doesn't need to tell this great court what it means for a black man living in America to have a restraining order against him. During the next year, the respondent, the Rock Hill Police Department, York County judiciaries, and other Powers That Be who are against the appellant will be plotting how they can trap him to get him bogusly arrested again by violating the restraining order, and continue their endeavor to destroy him to protect themselves. The following is an excerpt from the appellant's Motion To Dismiss the harassment charge that he was found NOT Guilty of, submitted to the Rock Hill Municipal Court before he was found NOT GUILTY [numerical paragraphs five (5) through nine (9)]:

"5) The City's judgment to restore charges against the Defendant that were filed against him almost 2 years ago (April 23, 2023) is nothing short of a crime, and is part of an elaborate calculated corrupt scheme to deny the Defendant his civil rights by falsely imprisoning him for 40 days and denying him his right to a speedy trial as afforded him by the sixth amendment of The Constitution of The United States. The Defendant has always maintained his complete innocence in this matter against the City's bogus allegations and charges. As previously stated, the Defendant asked for a jury trial from the very beginning as a *pro se* Defendant, and then again when he was represented by Attorney Leland Greeley. But the City refused to give the Defendant a speedy trial, and instead perpetuated the evil scheme of Nolle Pros with the right to restore for 18 months in an effort to buy time to destroy and fabricate evidence, and to get their ducks in a row knowing that the Defendant was going to sue them. The corrupt scheme of Nolle Pros for 18 months gave The City of Rock Hill time to get rid of those who would be a liability to them, and instruct others of the lies to tell to correspond with the lies they had already told, were going to tell, and are currently telling. The City of Rock Hill also knows that over a period of time witnesses forget things, and jurors

are not as easily convinced concerning things testified about that happened long ago. They were hoping that the Defendant would forget things in the 18 months, not keep documentation of their crimes, and eventually give-up as a financially ruined, disgraced, angry black man. However, there scheme didn't work, and by God's grace, it's not going to work. The City's actions in this matter is a page taken right out of the Jim Crow era where black people were falsely accused, unjustly fired from their jobs, falsely imprisoned by white oppressors, and their property illegally confiscated from them...all the time prolonging the justice process to destroy the black person via financial ruin because he or she would dare stand for justice in the face of racial injustice. The City's actions against the Defendant is tantamount to modern day slavery and a lynching. The City of Rock Hill also clearly knew that Attorney Swerling was more helpful to the city and the prosecution than he was to his client, the Defendant.

6)The City's evil scheme of refusing to give the Defendant a speedy trial and Nolle Prosing the matter for 18 months was also designed to give his ex-wife (Jacqueline "Miss Jackie" Brown Miller) time to conjure up more lies and allegations as found in the Motion To Restore, because they clearly understood that there was absolutely zero credibility in the initial bogus charges of harassment concerning Jacqueline Miller being copied on emails (see exhibit 2). The arrest warrant states that the Defendant copied Ms. Jackie Miller on emails after Ms. Miller had asked him not to contact her anymore on March 30, 2023 (3/30/2023). The Defendant was charged with harassment for copying Ms. Jackie Miller on business emails after March 30, 2023...emails which were legitimately required by the pending divorce. However, the evidence clearly indicates that Ms. Jackie Miller copied the Defendant herself on emails AFTER March 30, 2023 (3/30/2023) (see exhibit 3). The City of Rock Hill knew from the very beginning that these charges and allegations were bogus, yet deliberately, intentionally, and maliciously proceeded to falsely imprison the Defendant repeatedly (see exhibits 1, 11, 15-18). The City of Rock Hill wanted to give Jacqueline Miller 18 more months to harass and provoke the Defendant in hopes that he would react wrongfully or illegally. The City of Rock Hill helped and encouraged Jacqueline Miller in her evil actions for reasons well documented in this matter. The City of Rock Hill put a target on the Defendant's back for his ex-wife, armed her with a weapon, and declared open-season

on the Defendant and his associates for his ex-wife (see exhibits 19-25 and 33). She was given full reign to harass and stalk the Defendant and his associates, but according to Judge Modla's Order, the Defendant was simply to "walk away" from the harassment and stalking, because the Court has "jurisdiction" (slavery) over the Defendant, but not over his ex-wife (see page 5, last paragraph in Two Orders). This is totally unjust, not to mention insane logic. However, by God's grace, the Defendant did not become "the angry black man" that The City of Rock Hill wanted him to become and return the harassment and stalking to his ex-wife Ms. Jackie Miller, but instead ignored her illegal actions. Every allegation listed in the said Motion To Restore is 100% false. My attorney, Jack Swerling, said this much himself in his response to the said motion (see exhibit 29).

- 7) In yet another clear indicator of The City of Rock Hill's utter corruption in this matter, Ms. Jackie Miller sought a restraining order against the Defendant by filing a motion in York County at the Catawba/Ebenezer Magistrate's Office for "harassment and stalking." The motion was denied, and the complaint was dismissed by the York County Judge (see exhibits 4 and 5). Yet, Ms. Jackie's buddies at the City of Rock Hill repeatedly incarcerated the Defendant for the same actions that were dismissed by the Catawba/Ebenezer Magistrate. Amazingly corrupt.
- 8) Jacqueline Miller has repeatedly contacted and harassed members of the church that the Respondent/Defendant shepherds, including children (see exhibit 33).
- 9) The Defendant filed numerous legitimate complaints and police reports against his ex-wife Jacqueline Miller for harassment and abuse, including one for stalking when she came to his apartment and videoed him and a guest while she (Jacqueline Miller) had a restraining order against her not to come near the Defendant. All of the complaints and police reports filed by the Defendant were ignored over and over again by The City of Rock Hill Police, and no action was taken to protect the Defendant from his evil vindictive ex-wife (see exhibits 16-25). Jacqueline Miller works for the Rock Hill Police Department, and she knew her co-workers, especially Chief Chris Watts, were going to support, uphold, and encourage her in her wrongdoings. They know each other well. Yet, Jacqueline Miller's 100% bogus allegations have led to the Defendant being falsely imprisoned multiple times for a total of 40 (forty) days, fired from his

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job, defamed, and being defrauded out of his home which was illegally sold to white people. This is all part of the City's evil scheme to provoke the Defendant into doing something illegal in response to their illegal antics. What the City of Rock Hill and the Rock Hill Police have perpetuated and are perpetuating against the Defendant is police brutality...an extreme abuse of authority on the oppressed....a black man in the "United" States of America."

FOR THE FOREGOING REASONS, and others, the appellant humbly asks that this immediate emergency motion requesting that the restraining order at issue be quashed pending the appeal be granted. Thank you.

Prayerfully, peacefully, and sincerely submitted,



Johnny E. Miller

Appellant

October 23, 2025

5/16/26, 10:13 AM

AOL Mail - The Supreme Court of South Carolina

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The Supreme Court of South Carolina

From: Johnny E. Miller (johnnymillerjohn@aol.com)

To: jacklaw@aol.com; jackswerling@gmail.com; srobinson@sharikamrobinsonlaw.com;
gthompson@sharikamrobinsonlaw.com; jmrandall@comporium.net; chris@bencrump.com;
hannah.woods@scsolicitor16.org; ralph@warrennorman.com; jane.modla@cityofrockhill.com;
adys@heraldonline.com; tina.terry@wsoc-tv.com; alexandra.davis@yorkcountygov.com;
roland@rolandsmartin.com; benjamin.shealy@cityofrockhill.com; athomas@lbgreeleylaw.com;
lgreeley@lbgreeleylaw.com; awwEEKS@comporium.net; cawlaw@comporium.net; zm_paralegal@mlblaw.com;
grace@jbswerling.com; darryl1963@icloud.com; shannon.smarr@yorkcountygov.com;
shelley.channell@cityofrockhill.com; carlos.culbreath@cityofrockhill.com; hugh.harrelson@cityofrockhill.com;
jim.grayson@cityofrockhill.com; michael.belk@cityofrockhill.com; david.vehaun@cityofrockhill.com;
john.gettys@cityofrockhill.com; tommy@elrodpope.com; crb@cityofrockhill.com; chris.watts@cityofrockhill.com;
chris.hefner@cityofrockhill.com; jim.reno@cityofrockhill.com; perry.sutton@cityofrockhill.com;
john.black@cityofrockhill.com; kevin.sutton@cityofrockhill.com; brent.faulkenberry@cityofrockhill.com;
derrick.lindsay@cityofrockhill.com; shantay.greer@cityofrockhill.com; ctappfilings@sccourts.org;
supctfilings@sccourts.org

Re: johnnymillerjohn@aol.com

Date: Saturday, January 10, 2026 at 02:59 PM EST

Greetings to everyone and a Happy New Year.....

I pray most is well. Please find attached a letter that I received in the mail today (January 10, 2026) dated January 8, 2026 from The Honorable Clerk of Court for the Supreme Court of South Carolina, Ms. Patricia A. Howard Esq.....addressed to Ms. Shelley Channell, Clerk of Court for the Rock Hill Municipal Court.

Because I'm not an attorney, I really don't understand what the letter means or indicates, because my understanding is that the case referenced (Case No. 2023-A-46203-00966) and the accompanying motions cited in the letter have been resolved and done away with in the NOT GUILTY verdict rendered in the matter by a jury via a trial by jury in the Municipal Court of Rock Hill.....or possibly in the Catawba/Ebenezer Magistrate Court. Which of these two (2) Courts the jury trial actually took place in is kind of fuzzy to me since Judge Hoffmann of the

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Catawba/Ebenezer Magistrate Court presided over the jury trial in which the said NOT GUILTY verdict was rendered....even though the actual physical facility (the building) that the said jury trial was held in was the Municipal Court of Rock Hill. Also to further the fuzziness, I received an email from Attorney Swerling when he was representing me that the case was moved (against my wishes and instructions to Attorney Swerling) from the Rock Hill Municipal Court to the Catawba/Ebenezer Magistrate Court. Yet still further, it certainly seems to me that the NOT GUILTY letter and its accompanying correspondence via mail came from the Rock Hill Municipal Court as if it had jurisdiction over Case No. 2023-A-46203-00966 (**NOT** the Catawba/Ebenezer Magistrate Court) at the time the NOT GUILTY verdict was rendered. I guess this fuzziness could possibly be one issue the attached letter from the Supreme Court of South Carolina is addressing. Another guess is that the letter is addressing the issues of my original request or motion for a change of venue (cited I assume as "relief in this Court's original jurisdiction"), and the other three (3) motions the letter cites that were filed on May 29, 2025, have to be ruled on by the presiding Court even though the case has been resolved with a NOT GUILTY verdict. These are my two (2) most logical guesses given the circumstances.

Whatever the contents of the letter mean and indicate from a legal perspective, I do construe the letter from the Supreme Court of South Carolina as a positive move in the right direction to put this matter behind us since I was found NOT GUILTY by a jury of my peers. I will seek help on the matter to understand the letter. Thank you to Ms. Howard and the Supreme Court of South Carolina.

As a Christian by God's grace, I simply want peace, justice, and righteousness in this matter through God being glorified in Jesus

5/16/26, 10:13 AM

AOL Mail - The Supreme Court of South Carolina

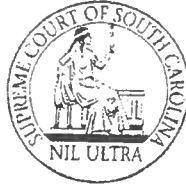
Christ, our Lord, Master, and Savior.

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Sincerely,
Johnny

"Never Confuse the Will of the Majority with the Will of GOD"

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The Supreme Court of South Carolina

Patricia A. Howard
CLERK OF COURT

Brenda F. Shealy
CHIEF DEPUTY CLERK

POST OFFICE BOX 11330
COLUMBIA, SOUTH CAROLINA
29211
TELEPHONE (803) 734-1080
FAX (803) 734-1459

January 8, 2026

Shelley Channell
Clerk of Court
Rock Hill Municipal Court
120 E. Black Street
Rock Hill, SC 29730

Jan 12 2026

Re: Johnny E. Miller v. City of Rock Hill, et al.
Appellate Case No. 2025-001838

Dear Ms. Channell:

Johnny E. Miller has filed a letter with this Court, which is being construed as a request for relief in this Court's original jurisdiction. A copy is enclosed. Please file a return to this petition and proof of service within ten (10) days from the date of this letter. In your return, please include the status of the following motions in Case No. 2023-A-46203-00966:

- (1) Motion for Change of Judicial Venue and Jurisdiction, filed May 29, 2025;
- (2) Motion for Continuation if Case is Not Dismissed, filed May 29, 2025; and
- (3) Motion to Reconsider, filed May 29, 2025.

Sincerely,

Patricia A. Howard
Clerk

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Enclosure

cc: Johnny E. Miller
Hannah Rene Woods
Catawba/Ebenezer Magistrate Court
City of Rock Hill
Jenny Abbott Kitchings

5/16/26, 9:36 AM

AOL Mail - Re: The Supreme Court of South Carolina

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Re: The Supreme Court of South Carolina

From: Johnny E. Miller (johnnymillerjohn@aol.com)

To: jacklaw@aol.com; jacksverling@gmail.com; srobinson@sharikamrobinsonlaw.com;
gthompson@sharikamrobinsonlaw.com; jmrandall@comporium.net; chris@bencrump.com;
hannah.woods@scsolicitor16.org; ralph@warrennorman.com; jane.modla@cityofrockhill.com;
adys@heraldonline.com; tina.terry@wsoc-tv.com; alexandra.davis@yorkcountygov.com;
roland@rolandsmartin.com; benjamin.shealy@cityofrockhill.com; athomas@lbgreeleylaw.com;
lgreeley@lbgreeleylaw.com; awwEEKS@comporium.net; cawlaw@comporium.net; zm_paralegal@mlblaw.com;
grace@jbsverling.com; darryl1963@icloud.com; shannon.smarr@yorkcountygov.com;
shelley.channell@cityofrockhill.com; carlos.culbreath@cityofrockhill.com; hugh.harrelson@cityofrockhill.com;
jim.grayson@cityofrockhill.com; michael.belk@cityofrockhill.com; david.vehaun@cityofrockhill.com;
john.gettys@cityofrockhill.com; tommy@elrodpope.com; crb@cityofrockhill.com; chris.watts@cityofrockhill.com;
chris.hefner@cityofrockhill.com; jim.reno@cityofrockhill.com; perry.sutton@cityofrockhill.com;
john.black@cityofrockhill.com; kevin.sutton@cityofrockhill.com; brent.faulkenberry@cityofrockhill.com;
derrick.lindsay@cityofrockhill.com; shantay.greer@cityofrockhill.com; ctappfilings@sccourts.org;
supctfilings@sccourts.org

Date: Monday, January 12, 2026 at 01:04 PM EST

Dear Supreme Court of South Carolina, South Carolina Court of Appeals, other honorable dignitaries, leaders of our community, and other concerned citizens.....

Please see an email below dated April 17, 2025 at 10:44 AM from Ms. Shantay Greer on the behalf of Ms. Shelley Channell that states;

"This case has been transferred to the Magistrates Court because of allegations of conflicts and will be tried by a General Sessions Solicitor and presided over by a Magistrate."

This case that Ms. Greer is speaking of is the criminal harassment charge case wherein I was found NOT GUILTY.

The statement above from Ms. Greer clearly seems to indicate that the jury trial wherein I was found NOT GUILTY was held in the Ebenezer/Catawba Magistrate's Court with Judge Hoffman presiding over it ~~not in the Rock Hill Municipal Court~~

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This is very important because Judge Colton states in the attached document (see attached document item #1 under Criminal Case) that the jury trial "was a Harassment criminal charge that **was tried in the Municipal Court of Rock Hill.**" Judge Colton's statement directly contradicts what Ms. Greer says in the email below and what Attorney Swerling told me about the matter being moved to the Magistrate Court when he was representing me.

I am also looking for the email that Attorney Swerling sent to me telling me that the case had been moved into Magistrate Court to share.

Sincerely,
Johnny

Greer, Shantay
From: shantay.greer@cityofrockhill.com
To: Johnny E. Miller
Cc: jacklaw@aol.com, Shealy, Benjamin, Channell, Shelley, Modla, Jane
Thu, Apr 17, 2025 at 10:44 AM

Mr. Miller,

I am responding because Shelley Channell, Clerk of Court, is out of the office this week.

We cannot accept any motions from you as you have an attorney, Mr. Swerling (who has not been relieved), and all filings should come from him and his office. Furthermore, there is no such thing as a Motion to Dismiss in the Summary Courts. This case has been transferred to the Magistrates Court because of allegations of conflicts and will be tried by a General Sessions Solicitor and presided over by a Magistrate. Your attorney, Mr. Swerling, will be notified when said case has been scheduled for Jury Trial.

Thank you,

Shantay Greer

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Porter, Kristen

RECEIVED

JAN 09 2026

From: Colton, Jennifer <Jennifer.Colton@yorkcountysc.gov>
Sent: Friday, January 9, 2026 10:09 AM
To: Porter, Kristen
Cc: Hoffmann, Tea
Subject: FW: 2025-001838 - Miller v. City of Rock Hill, et al.
Attachments: 2025-001838 - Miller - Return Request.pdf; Petition for Emergency Writ of Mandamus (1).pdf; Form 4 J. Salvini dismissal.pdf; Form 4 J. Morgan affirms Magistrate Court.pdf; motion to reconsider.pdf

SC SUPREME COURT

*** **EXTERNAL EMAIL:** This email originated from outside the organization. Please exercise caution before clicking any links or opening attachments. ***

Ms. Porter.

My office received this email from the Rock Hill City Court yesterday. Judge Modla (Chief Judge for the City of Rock Hill) contracted my office and inquired as to whether we responded. I was unaware that anything was required of us as this is the first I have heard of an inquiry from the Court. I am not sure what the S.Ct. needs from us but I will try to explain the procedural history of these cases that Mr. Miller had pending in the Catawba Ebenezer Magistrate Court in the hopes that can help clarify what, if anything, we can assist with.

1. Criminal Case:

City of Rock Hill v. Miller 2023 A 46203 00966, referenced by Mr. Miller as "Primary Case" was a Harassment criminal charge that was tried in the Municipal Court of Rock Hill. The municipal judges in Rock Hill as well as the City Prosecutor's office, all recused themselves from the case. It was prosecuted by the 16th Circuit Solicitor's office, Senior Solicitor Hannah Woods, Mr. Miller was pro se, and MAGISTRATE Telisha Hoffman (who is also assigned to the Catawba Ebenezer Courthouse) presided over the jury trial. Mr. Miller was found not guilty by the jury.

NOTE: I am cc'ing Judge Hoffman on this email as it appears from the Return Request, that you are requesting a Return solely from that case. That case is not pending as a jury found Mr. Miller not guilty.

2. Civil Restraining order referenced by Mr. Miller: It appears that part of the petition for the Emergency Writ of Mandamus includes a case over which I presided, so I can provide some information regarding the status of this case only.

Magistrate case number : 2025 OR 46 10300055, referenced as the "TERTIARY case" is a restraining order that I presided over. The court issued a restraining order against Mr. Miller.

Mr. Miller appealed the ruling **AND** filed a Motion to Quash Restraining Order Pending Appeal. (on November 14, 2025). The appeal of the magistrate court case is Circuit Court case number 2025CP 4604122.

1. Judge Salvini denied the motion to quash the restraining order (See attachment "Form 4 J. Salvini dismissal").
2. Judge McKinnon ordered an expedited hearing on the Appeal and set it for December 16, 2025.
3. Judge Morgan presided over the Appeal from Magistrate Court, and affirmed the Magistrate Court's issuance of a restraining order. (Attached as Form 4 J. Morgan affirms Magistrate Court).
4. On December 29, 2025, Mr. Miller filed a Motion to Reconsider the Judge Morgan's order. That matter as of today is still pending in the Circuit Court. Attached as "Motion to Reconsider".

My assumption is that the civil restraining order is still pending as a motion to reconsider the circuit court's appellate decision.

Jan 12 2026

5/16/26, 9:46 AM

AOL Mail - Re: The Supreme Court of South Carolina

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Re: The Supreme Court of South Carolina

From: Johnny E. Miller (johnnymillerjohn@aol.com)

To: jacklaw@aol.com; jackswerling@gmail.com; srobinson@sharikamrobinsonlaw.com; gthompson@sharikamrobinsonlaw.com; jmrandall@comporium.net; chris@bencrump.com; hannah.woods@scsolicitor16.org; ralph@warrennorman.com; jane.modla@cityofrockhill.com; adys@heraldonline.com; tina.terry@wsoc-tv.com; alexandra.davis@yorkcountygov.com; roland@rolandsmartin.com; benjamin.shealy@cityofrockhill.com; athomas@lbgreeleylaw.com; lgreeley@lbgreeleylaw.com; awwEEKS@comporium.net; cawlaw@comporium.net; zm_paralegal@mlblaw.com; grace@jbswerling.com; darryl1963@icloud.com; shannon.smarr@yorkcountygov.com; shelley.channell@cityofrockhill.com; carlos.culbreath@cityofrockhill.com; hugh.harrelson@cityofrockhill.com; jim.grayson@cityofrockhill.com; michael.belk@cityofrockhill.com; david.vehaun@cityofrockhill.com; john.gettys@cityofrockhill.com; tommy@elrodpope.com; crb@cityofrockhill.com; chris.watts@cityofrockhill.com; chris.hefner@cityofrockhill.com; jim.reno@cityofrockhill.com; perry.sutton@cityofrockhill.com; john.black@cityofrockhill.com; kevin.sutton@cityofrockhill.com; brent.faulkenberry@cityofrockhill.com; derrick.lindsay@cityofrockhill.com; shantay.greer@cityofrockhill.com; ctappfilings@sccourts.org; supctfilings@sccourts.org

Date: Monday, January 12, 2026 at 01:50 PM EST

To all.....

Please see email correspondence below dated May 20, 2025 between Ms. Shantay Greer and Attorney Jack Swerling wherein Ms. Greer replies to Attorney Swerling concerning his *Motion To Be Relieved (MTBR)* as counsel from me by telling him; "**You will need to file the motion with the Rock Hill Magistrate's Office since it has been transferred so they can schedule the MTBR hearing.**"

Sincerely,
Johnny

Greer, Shantay

From: shantay.greer@cityofrockhill.com

To: JACK SWERLING, Tea Hoffmann, Modla, Jane

Cc: Hannah Woods, Shannon Smarr, Grace Moscoso, Johnny E. Miller

Tue, May 20, 2025 at 4:47 PM

Mr. Swerling,

You will need to file the motion with the Rock Hill Magistrate's Office since it has been transferred so they can schedule the MTBR hearing.

5/16/26, 9:46 AM

AOL Mail - Re: The Supreme Court of South Carolina

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Thank you,

Shantay Greer

Administrative Supervisor/Ministerial Recorder
City Management
City of Rock Hill
P.O. Box 11706
120 East Black Street (29730)
Rock Hill, South Carolina 29731-1706
o: 803-329-8796
f: 803-329-8741

shantay.greer@cityofrockhill.com
www.cityofrockhill.com

From: JACK SWERLING <jacklaw@aol.com>

Sent: Tuesday, May 20, 2025 4:08 PM

To: Tea Hoffmann <tea.hoffmann@yorkcountygov.com>

Cc: Hannah Woods <hannah.woods@scsolicitor16.org>; Shannon Smarr
<Shannon.Smarr@yorkcountygov.com>; Greer, Shantay <Shantay.Greer@cityofrockhill.com>;
Grace Moscoso <Grace@jbswerling.com>; Johnny E. Miller <johnnymillerjohn@aol.com>

Subject: Re: Scheduling Johnny Miller Trial

CAUTION: not from City of Rock Hill...from Unknown Source...Beware, proceed with CAUTION

I have prepared a Motion to Be Relieved As Counsel and was preparing to send it out today. The Motion is addressed to Judge Moda and Benjamin Shealy. The relationship between the defendant and I is irretrievably broken based on his unfounded slander and libelous public comments that I am in a conspiracy with personnel at the Rock Hill Municipal Court and his former wife to work against his best interests. I will forward the Motion shortly to everyone noted here and in the Rock Hill Municipal Court and request a hearing next week so that I can be heard on this matter.

Jack Swerling

1720 Main Street, Columbia, SC 29201

Office: (803) 765-2626

Cell: (803) 237-6300

5/16/26, 9:50 AM

AOL Mail - The Supreme Court of South Carolina

The Supreme Court of South Carolina

171

From: Johnny E. Miller (johnnymillerjohn@aol.com)

To: jacklaw@aol.com; jackswerling@gmail.com; srobinson@sharikamrobinsonlaw.com;
gthompson@sharikamrobinsonlaw.com; jmrall@comporium.net; chris@bencrump.com;
hannah.woods@scsolicitor16.org; ralph@warrennorman.com; jane.modla@cityofrockhill.com;
adys@heraldonline.com; tina.terry@wsoc-tv.com; alexandra.davis@yorkcountygov.com;
roland@rolandsmartin.com; benjamin.shealy@cityofrockhill.com; athomas@lbgreeleylaw.com;
lgreeley@lbgreeleylaw.com; awwweeks@comporium.net; cawlaw@comporium.net; zm_paralegal@mlblaw.com;
grace@jbswerling.com; darryl1963@icloud.com; shannon.smarr@yorkcountygov.com;
shelley.channell@cityofrockhill.com; carlos.culbreath@cityofrockhill.com; hugh.harrelson@cityofrockhill.com;
jim.grayson@cityofrockhill.com; michael.belk@cityofrockhill.com; david.vehaun@cityofrockhill.com;
john.gettys@cityofrockhill.com; tommy@elrodpope.com; crb@cityofrockhill.com; chris.watts@cityofrockhill.com;
chris.hefner@cityofrockhill.com; jim.reno@cityofrockhill.com; perry.sutton@cityofrockhill.com;
john.black@cityofrockhill.com; kevin.sutton@cityofrockhill.com; brent.faulkenberry@cityofrockhill.com;
derrick.lindsay@cityofrockhill.com; shantay.greer@cityofrockhill.com; ctappfilings@sccourts.org;
supctfilings@sccourts.org

Date: Monday, January 12, 2026 at 02:42 PM EST

To all again.....

Please see the attached letter from Ms. Shelley Channell (Clerk of Court for the Rock Hill Municipal Court) dated January 8, 2026 to Ms. Kristen Porter (Case Management Specialist for the Supreme Court of South Carolina). The letter seems to indicate that Ms. Channell is stating that the harassment jury case was tried in the Rock Hill Municipal Court, which of course is **incorrect**. The jury case was tried in the Magistrate Court by Judge Hoffman of the Catawba/Ebenezer Magistrate's Office.

Ms. Channel states in the letter; "We have reached out to the Catawba/Ebenezer Magistrate office about their restraining order and they stated they will have someone respond to the email about **their** case." Ms. Channel seems to indicate by this sentence that the current bogus restraining order issued by Judge Colton is **their** case.....**their** being the Catawba/Ebenezer Magistrate Court, but the harassment jury case belonged to the Rock Hill Municipal Court.

5/16/26, 9:50 AM

AOL Mail - The Supreme Court of South Carolina

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Again, Ms. Channell's statement implies that the harassment case was not tried in the Magistrate's Court, but in the Rock Hill Municipal Court. Again, this is **incorrect**.

Of course, it is crystal clear why Judge Colton would like for the higher Courts to believe that the jury case was tried by the Rock Hill Municipal Court.

Sincerely,
Johnny

Sincerely,
Johnny

"Never Confuse the Will of the Majority with the Will of GOD"

On Monday, January 12, 2026 at 01:53:30 PM EST, Johnny E. Miller <johnnymillerjohn@aol.com> wrote:

The MTBR hearing was presided over by Judge Hoffman from the Catawba/Ebenezer Magistrate's Court.

Sincerely,
Johnny

"Never Confuse the Will of the Majority with the Will of GOD"

173

Porter, Kristen

From: Channell, Shelley <Shelley.Channell@cityofrockhill.com>
Sent: Thursday, January 8, 2026 2:52 PM
To: Porter, Kristen; Shealy, Brenda
Cc: Modla, Jane
Subject: RE: 2025-001838 - Miller v. City of Rock Hill, et al.

RECEIVED

JAN 08 2026

SC SUPREME COURT

***** EXTERNAL EMAIL:** This email originated from outside the organization. Please exercise caution before clicking any links or opening attachments. *******

Dear Kristen,

Judge Modla and I just spoke with Brenda Shealy about the above case number and your email us requesting a return on these matters. Johnny Miller had a jury trial in September 2025 on the harassment charge and was found not guilty. I believe all the mention motions were denied by Judge Hoffman prior to the trial. All our files have been expunged. Brenda asked me to put this in writing. If you need anything else, please let me know. Thank you. We have reached out to the Catawba/Ebenezer Magistrate office about their restraining order and they stated they will have someone respond to the email about their case.

Shelley Channell

Clerk Of Court
City Management
City of Rock Hill
P.O. Box 11706
120 East Black Street (29730)
Rock Hill, South Carolina 29731-1706
o: 803-329-5683
f: 803-326-3818

shelley.channell@cityofrockhill.com
www.cityofrockhill.com

From: Porter, Kristen <kporter@sccourts.org>
Sent: Thursday, January 8, 2026 8:41 AM
To: Channell, Shelley <Shelley.Channell@cityofrockhill.com>
Subject: 2025-001838 - Miller v. City of Rock Hill, et al.

CAUTION: not from City of Rock Hill...from Unknown Source...Beware, proceed with **CAUTION**

Please see the attached request for a return in the above referenced case.

Thank you,
Kristen Porter
Case Management Specialist
Supreme Court of South Carolina

5/16/26, 9:51 AM

AOL Mail - Re: The Supreme Court of South Carolina

174

Re: The Supreme Court of South Carolina

From: Johnny E. Miller (johnnymillerjohn@aol.com)

To: jacklaw@aol.com; jackswerling@gmail.com; srobinson@sharikamrobinsonlaw.com; gthompson@sharikamrobinsonlaw.com; jmrandall@comporium.net; chris@bencrump.com; hannah.woods@scsolicitor16.org; ralph@warrennorman.com; jane.modla@cityofrockhill.com; adys@heraldonline.com; tina.terry@wsoc-tv.com; alexandra.davis@yorkcountygov.com; roland@rolandsmartin.com; benjamin.shealy@cityofrockhill.com; athomas@lbgreeleylaw.com; lgreeley@lbgreeleylaw.com; awweeks@comporium.net; cawlaw@comporium.net; zm_paralegal@mlblaw.com; grace@jbswerling.com; darryl1963@icloud.com; shannon.smarr@yorkcountygov.com; shelley.channell@cityofrockhill.com; carlos.culbreath@cityofrockhill.com; hugh.harrelson@cityofrockhill.com; jim.grayson@cityofrockhill.com; michael.belk@cityofrockhill.com; david.vehaun@cityofrockhill.com; john.gettys@cityofrockhill.com; tommy@elrodpope.com; crb@cityofrockhill.com; chris.watts@cityofrockhill.com; chris.hefner@cityofrockhill.com; jim.reno@cityofrockhill.com; perry.sutton@cityofrockhill.com; john.black@cityofrockhill.com; kevin.sutton@cityofrockhill.com; brent.faulkenberry@cityofrockhill.com; derrick.lindsay@cityofrockhill.com; shantay.greer@cityofrockhill.com; ctappfilings@sccourts.org; supctfilings@sccourts.org

Date: Monday, January 12, 2026 at 03:07 PM EST

Very humbly before God through Jesus Christ my Lord, Master, and Savior.....

As I said from the very beginning.....my opposers have all been in this together from the very beginning.....conspiring to destroy a completely innocent man. And I'm only completely innocent by God's grace. However, I forgive and love them all....my ex-wife, Chief Watts, Judge Lenzi, Ben Shealy, Jack Swerling, Judge Colton, Judge White, Judge Pincus, Judge Roper, and others. I have no animosity or bitterness in my heart at all against anyone. Again, I love and forgive them all. I just want peace and justice to prevail. Ultimately, it is ALL God's plan. All authentic Christians must suffer wrongfully according to the Word of God, and love their enemies. However.....I'll sure be glad when this is over with. Time belongs to God.

Sincerely,
Johnny

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2005 OCT 20 11:15

STATE OF SOUTH CAROLINA

COUNTY OF _____

APPELLANT(S)

VS.

RESPONDENT(S)

2025CP4604122
COMMON PLEAS CASE NUMBER

2025CP4604122
MAGISTRATE CIVIL CASE NUMBER

IN THE COURT OF COMMON PLEAS

NOTICE OF CIVIL APPEAL

The plaintiff/defendant (circle one), Plaintiff hereby gives notice of appeal from the judgment of the magistrate's court in the above action, to the Circuit Court of Common Pleas, in the county of _____.

This notice of appeal is made subsequent to personal notice of the judgment which was received on the _____ day of _____, 2005.

The appellant's exceptions to the judgment of the magistrate are set forth as follows:

The appellant hereby certifies that the judgment of the magistrate is not supported by the evidence in the record and that the appellant is entitled to a new trial.

Date: _____

Phone: _____

Email: _____

Appellant (or his attorney)

Address: _____

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LETTER TO CLERK OF LOWER COURT
NOTICE OF APPEAL FILING

October 20, 2025

To : The Civil Department
Catawba/Ebenezer Magistrate's Office
1070 Heckle Blvd. Suite 2100 or 1200
Rock Hill, SC 29732

RE: Jacqueline Miller, Respondent v. Johnny E. Miller, Appellant, Case No.
2025OR4610300055

Dear Ms. Stinson or other office personnel.....

Please find enclosed and/or attached for filing a *Notice of Civil Appeal* in the above case, and its corresponding Certificate of Service. Due to extenuating circumstances, will you please make sure to send this filing to the respondent, Jackie Miller. It's a Catch-22 situation for me. I have been incarcerated for sending her documents that I was required to send her by law as we are both pro se litigants.

The Entire Appeal Submission to The Honorable Courts contains the following:

- 1) Notice Of Civil Appeal
 - a) Affidavit of Ms. Melissa Randall concerning October 8, 2025 motion hearing before The Honorable Judge Colton
 - b) Affidavit of Mr. Marchavis Caldwell concerning October 8, 2025 motion hearing before The Honorable Judge Colton
 - c) Defendant's Answer To The Restraining Order Request
 - i. Seven (7) Police Reports filed by the appellant/defendant Johnny Miller
 - ii. A "Request For Action" Petition signed by eighteen (18) concerned citizens on the behalf of the appellant/defendant

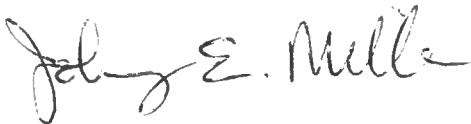
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- iii. Nine (9) affidavits submitted in support of the appellant/defendant
 - 1. Mr. Edward Miller
 - 2. Ms. Patricia Miller
 - 3. Mr. Marchavis Caldwell
 - 4. Ms. Tammy Christensen Walker
 - 5. Mr. Rodney McCray
 - 6. Mr. Michael Abraham
 - 7. Ms. Melissa Randall
 - 8. Mr. Ellis Randall
 - 9. Mr. Stanley Jackson
 - iv. Order from The Honorable Judge Cousins denying the plaintiff's/respondent's Jacqueline Miller request for a restraining order and its corresponding summons and complaint
 - d) Defendant's Emergency Motion For Continuance
 - e) Email response from Ms. Stinson indicating the requested continuance is granted
 - f) Certificate Of Service
- 2) Respondent's/Plaintiff's Summons and Complaint signed by The Honorable Judge Hoffman, who is also a colleague of The Honorable Judge Colton in the Catawba/Ebenezer Magistrate's Office
 - 3) The Restraining Order ordered against the appellant/defendant, Johnny E. Miller
 - 4) Motion To Dismiss and/or Revoke Restraining Order
 - 5) Amended Motion To Dismiss and/or Revoke Restraining Order
 - 6) Summons for October 8, 2025 hearing for Motion/Amended Motion To Dismiss and/or Revoke Restraining Order
 - 7) USB drive with recording of record for the said October 8, 2025 hearing

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Thank you.

Sincerely and truthfully submitted in Christ Jesus,

A handwritten signature in cursive script that reads "Johnny E. Miller". The signature is written in dark ink and is positioned above the printed contact information.

Johnny E. Miller

1829 Paces River Ave. #106

Rock Hill, SC 29732

(803) 517-0378

johnnymillerjohn@aol.com

Pro Se

STATE OF SOUTH CAROLINA
COUNTY OF YORK

Johnny E. Miller
Appellant

vs.

Jacqueline Miller
Respondent

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IN THE YORK COUNTY CIRCUIT
COURT OF COMMON PLEAS

Case No. 2025CP4604122

APPEAL FROM THE CATAWBA/EBENEZER
MAGISTRATE COURT

Case No. **2025OR4610300055**
THE HONORABLE JENNIFER COLTON

NOTICE OF CIVIL APPEAL

In accordance with Rule 18 that governs Magistrate Court appeals, the defendant, Johnny E. Miller, hereby gives notice of appeal from the judgment of the magistrate's court in the above action, to the Circuit Court of Common Pleas, in the county of York, South Carolina.

This notice of appeal is made subsequent to personal notice of the judgment which was received on the 8th day of October, 2025 which denied the defendant's motion to amend the original judgment in this matter rendered in a hearing on July 24th, 2025 which granted a Restraining Order to the plaintiff, Jacqueline "Jackie" Miller, against the defendant.

This immediate appeal is requesting that the judgment granting the restraining order at issue in this immediate matter be vacated and/or reversed.

The appellant's exceptions to the judgment of the magistrate are set-forth as follows:

- 1) On October 8, 2025, a hearing was held before the honorable Judge Colton to consider the defendant's/appellant's Motion To Dismiss, Altar, and/or Amend Judge Colter's judgment that granted the plaintiff/respondent, Jacqueline "Jackie" Miller a restraining order against the defendant/appellant, Johnny E. Miller in a hearing held on July 24th, 2025.
- 2) The magistrate (The Honorable Judge Jennifer Colton) **illogically** (against all legitimate human reasoning) interpreted the evidence presented at the initial July 24, 2025 hearing and/or totally 100% ignored it (**hear 24 minutes and 25 seconds mark in the recording of record**).

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3) The recording of record of the July 24, 2025 hearing, wherein multiple witnesses testified (Melissa Randall and Marchavis Caldwell) on the behalf of the appellant, does not exist due to a malfunction of some kind as stated by Magistrate Colton. No one except the plaintiff herself testified on her behalf at the said hearing. It is the appellant's belief that Judge Colton intentionally made the recording of record unavailable because of the damaging testimony and evidence presented against the respondent Jackie Miller, the Rock Hill Police Department, and York County Judicial officials.

4) All of the relevant testimony from live witnesses testifying before Judge Colton in this matter that leads to justice has been lost in the malfunctioning of the recording of record at the original July 24, 2025 hearing. This leaves the justice of this matter solely in the hands of Judge Colton as a dictator judge who totally ignores all the evidence based on her own biased prejudice against the appellant, and her inability to muster up the courage to do the right thing by going against her judicial colleagues' past judgments. Also lost in the said recording of record is the appellant stating to Judge Colton in the July 24, 2025 hearing that she (Judge Colton) would have to go against many of her judicial colleagues in York County if she ruled against Jackie Miller in not granting the restraining order against the appellant. Judge Colton faced extreme professional pressure from her judiciary legal community of peers; the kind clearly expressed by author and professor, Dr. Robin Diangelo in her book; *White Fragility*. Dr. Diangelo writes;

"White solidarity is the unspoken agreement among whites to protect white advantage and not cause another white person to feel racial discomfort by confronting them when they say or do something racially problematic. Educational researcher Christine Sleeter describes this solidarity as white "racial bonding." She observes that when whites interact, they affirm "a common stance on race-related issues, legitimating particular interpretations of groups of color, and drawing conspiratorial we-they boundaries." White solidarity requires both silence about anything that exposes the advantages of the white position and tacit agreement to remain racially united in the protection of white supremacy. To break white solidarity is to break rank."

"The very real consequences of breaking white solidarity play a fundamental role in maintaining white supremacy. We do indeed risk censure and other penalties from our fellow whites. We might be accused of being politically correct or might be perceived as angry, humorless, combative, and not suited to go far in an organization. In my own life, these penalties have worked as a

form of social coercion. Seeking to avoid conflict and wanting to be liked, I have chosen silence all too often.”

“Conversely, when I kept quiet about racism, I was rewarded with social capital such as being seen as fun, cooperative, and a team player.” (pages 57-58 *White Fragility*).

What Dr. Diangelo states here is especially true and prevalent in the legal profession....especially among judges and attorneys. The decisions made by judges and attorneys affect other people's lives in tremendous ways, and in the states of South Carolina and Virginia, the weight of consideration for promotions, advancement, and prominence for lawyers and judges is more heavily dependent on their evaluations of their peers more than in any of the other 48 states.

5) With all due respect to the court, Judge Colton outright lied in the October 8, 2025 hearing, revealing the intent to deceive when doing so. This can be easily proven through inference, sound reasoning, listening to the recording of record for the October 8th 2025 hearing, and reading this immediate appeal and the affidavits submitted by the witnesses who were at both the July 24th and October 8th hearings. Judge Colton lies when she states that the appellant was the party who initiated the court setting the limit at 6 months to consider prior incidents of harassment and stalking by objecting to allowing anything in the record that the respondent Jackie Miller testified about that happened more than 6 months ago. This is an outright lie by Judge Colton. **Judge Colton can be heard telling this lie at the 18 minute and 50 seconds mark of the recording of record for the October 8th hearing.** Judge Colton deceitfully set the limit of prior incidents of harassment and stalking to be considered at 6 months herself. She did so in the July 24th hearing explicitly stating that as the judge, she has the right to set limits and consider what she wants to, and she said she would not consider any incidents of harassment and stalking more than 6 months before July 24, 2025. The appellant asserts that Judge Colton limited prior incidents to 6 months to deliberately and intentionally prevent the pattern of consistent and ongoing harassment and stalking of the appellant by the respondent for the last three plus years to be entered into the record as evidence. The appellant called law enforcement numerous times and filed numerous reports of harassment and stalking against Jackie Miller the plaintiff and respondent, but without any action whatsoever by law enforcement that the appellant is aware of to prevent the respondent from continuing to harass and stalk him. Judge Colton knew she had done away with the recording of record for the July 24th hearing, therefore she was the judge, jury, and sole entity to completely control the outcome of the hearing. There is absolutely no doubt in the appellant's mind that Judge

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Jennifer Colton is a corrupt sitting judge (as others in York County, SC have been clearly manifested in the appellant's legal matters), and unfit to have authority over any human's life. There is absolutely no legitimate or rational reason that the appellant would ever want to limit anything that the respondent testified about to 6 months before the hearing. **The appellant clearly testifies at the beginning of the hearing at the 1 minute and 50 seconds mark of the recording of record that he has never in his life harassed the respondent, so there is no rational reason for the appellant to ask the court to limit the respondent's testimony to 6 months.** The court egregiously lied here to setup a false alibi to justify herself setting the limit at 6 months to prevent the respondent's/plaintiff's consistent pattern of harassment and stalking of the appellant/defendant for over three plus years to be admitted into the record. This is an outrageous example of corruption for a sitting judge.

6) In the initial July 24th 2025 hearing for which we have no recording of record, Judge Colton asked the appellant would he agree to "mutual" restraining orders where she imposed one on the appellant and respondent at the other's mutual request. The appellant Johnny Miller replied "no"....he would not agree to mutual restraining orders because it is against his convictions to submit to something that is wrong, because he hadn't done anything to have a restraining order issued against him. The appellant humbly submits the following questions to the Appellant Court; "What would be the purpose for Judge Colton to ask the appellant would he agree to mutual restraining orders?....does Judge Colton believe there's really not any evidence to legally justify a restraining order against the appellant?.....and is it legally appropriate for a judge to ask such a question in a restraining order hearing?"

7) **At the 25 minutes and 50 seconds mark through the 27 minute mark of the recording of record, Judge Colton accuses the appellant of filing frivolous motions and submitting frivolous documents to her, and attempting to file court documents to her via email.** All of what Judge Colton says here are blatant lies. The only way she could show any proof of any of what she said here is to manufacture false evidence.

8) Both witnesses (Melissa Randall and Marchavis Caldwell) who testified on the behalf of the appellant at the said July 24th hearing were present at the said October 8th hearing. The appellant more than once asked Judge Colton at the October 8th hearing to allow the witnesses to testify again so their testimonies would be on record since there was no record of their testimonies, because the recording of record does not exist for the July 24th hearing. Judge Colton utterly denied the

appellant's request, and refused to allow the witnesses to testify again to have their testimonies on record, and so she could control the outcome of this matter as a dictator (hear the recording of record at the **16 minutes and 45 seconds mark, at the 22 minutes and 10 seconds mark, at the 24 minutes and 50 seconds mark, and at the 25 minutes and 30 seconds mark**). The appellant very respectfully submits that the plain truth is offensive to the perpetrator of wrongdoing. The appellant also stated this in the October 8th hearing when it was evident to him that Judge Colton was agitated and offended by his testimony in the July 24th hearing.

9) The appellant submitted to the honorable Judge Colton in both the July 24th hearing and the October 8th hearing that it was his belief that it was impossible for him to receive a fair and just hearing anywhere in York County, SC regardless of what he said or did or presented to the courts. **The appellant can be heard making this statement at the 11 minutes and 45 seconds mark, at the 14 minutes and 45 seconds mark, at the 15 minutes and 50 seconds mark, and at the 17 minutes and 40 seconds mark of the recording of record.**

10) The defendant/appellant is proceeding *pro se* in this matter because he has been unable to obtain and secure an attorney to represent him in this and closely related matters due strictly to judicial corruption in the defendant's/appellant's opinion. The appellant/defendant Johnny Miller has hired two attorneys in related matters concerning the plaintiff/respondent....his ex-wife Jackie Miller....and the appellant paid the attorneys a total of \$40,000.00 (forty-thousand dollars), and both of them quit on the appellant because he would not admit to and/or plead to something he didn't do or wasn't guilty of. The York County Judicial System is inundated with corruption. Out of 12 plus judges whom the appellant and respondent have stood before in related matters, only one ruled completely in the appellant's favor. The plaintiff/respondent, Jacqueline Miller, is the defendant's/appellant's ex-wife. They were married for 42 (forty-two) years. Jacqueline Miller works for the Rock Hill Police Department and has carried out a continuous pattern of harassment and stalking against the defendant/appellant for over three (3) years, aided and abetted by the Rock Hill Chief of Police (Chris Watts), the City of Rock Hill, and a corrupt York County Judicial System. The evidence to support what the defendant/appellant is stating here is absolutely overwhelming, but has been totally ignored by more than twelve (12) judges within the York County Judicial System whom the defendant and plaintiff have stood before in various courts related to matters all related to a bitter divorce after 42 years of marriage. The plaintiff/respondent Jackie Miller has repeatedly told lies in related matters which the Rock Hill Police and York County Judicial System have

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BELIEVED OR ACTED AS THEY BELIEVED THEM on face value, viciously ignoring evidence submitted to the police and courts by the defendant/appellant, including multiple witnesses who testified live in court on the behalf of the defendant/appellant, and submitted affidavits that utterly refuted the plaintiff's/respondent's false allegations against the defendant/appellant.

11) All related charges and legal matters against the appellant based on the initial charge of harassment_2nd degree in the Municipal Court of Rock Hill, SC (2023A4620300966) from which this immediate request for a restraining order arises are 100% false and outrageously bogus. The appellant has been found NOT GUILTY by a jury of his York County peers, and has presented an overwhelming amount of evidence in various legal venues in York County, South Carolina which clearly supports that the charge of harassment_2nd degree and related charges are completely unfounded. Yet, the honorable Judge Colton still issued and refused to amend her judgment granting the restraining order against the appellant. This is an incredibly corrupt and outrageously bogus judgment in the opinion of the appellant.

12) As stated above, the plaintiff/respondent in this matter and the alleged victim of the said harassment/stalking allegations which resulted in the current bogus restraining order being granted is Jacqueline Miller, an employee of the Rock Hill Police Department. Jacqueline Miller is also the defendant's ex-wife via a very bitter divorce that was granted in December of 2022 after 42 years of marriage. The prosecuting attorneys, the presiding judges (including Judge Colton and Judge Hoffmann), the arresting officers and judges, the Rock Hill Police investigator, and the Rock Hill Chief of Police who have steadfastly upheld Jacqueline Miller in her wrongdoings which have resulted in the appellant being falsely incarcerated for forty (40) days, fired from his job as a 6th grade public school teacher, and a bogus no-contact order being issued against him "**ALL**" **work for the City of Rock Hill and all are white (Caucasian)**. Racism is involved here. This is a travesty of justice within itself. Furthermore, the judge who presided over the said harassment case in the Rock Hill Municipal Court in which the appellant was found NOT GUILTY by a jury is the Honorable Telisha Hoffmann. Judge Hoffman is also the judge in this immediate court who signed the summons on the behalf of the respondent/plaintiff for the appellant/defendant to appear in court to answer to this bogus matter of a restraining order being sought against him. Judge Hoffmann signed the said summons while having all of the evidence included in this immediate appeal before her (except for the NOT GUILTY verdict), which is also in the **MOTION TO DISMISS** which Judge Hoffman denied just before the NOT GUILTY verdict was rendered in the said harassment case.

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13) This immediate appeal includes the following exhibits, which were also presented at the initial hearing on July 24, 2025 before Judge Colton:

A-1_Seven (7) police reports made by the Defendant, Johnny Miller, against the Plaintiff, Jacqueline Miller, ranging from July 2021 until June 2025.

A-2_A "Request For Action" petition against the Plaintiff signed by 18 concerned citizens.

A-3_Nine (9) affidavits from concerned citizens who testify of the Plaintiff's outrageous behavior in the affidavits.

A-4_A previous summons in this same court venue wherein the Plaintiff sought a restraining order against the Defendant that was denied by the Honorable Judge Cousins on June 20, 2023...over 2 years ago. Judge Cousin's Order is also included after the summons.

14) The attached exhibits are self-explanatory if read, yet the York County judiciaries, and law enforcement agencies have taken absolutely no action against the respondent that the appellant is aware to protect him from her vicious stalking and harassment. To the contrary....as the appellant has stated in many previous court filings....the York County authorities aid and abet the respondent by their actions, and in essence are harassing the appellant themselves. The appellant respectfully and sincerely asserts that the restraining order which is the subject of this immediate appeal is yet another incident of harassment perpetrated on the appellant by the respondent and yet another York County sitting judge. The appellant has filed five (5) Citizen Complaints against the City of Rock Hill Police Department....all deemed UNFOUNDED. AMAZING. In the appellant's understanding of these matters, these are criminal and sinful actions by Jacqueline Miller and the York County authorities.

15) Obstruction of justice, false imprisonment, civil and criminal defamation of character, violation of right to a speedy and public trial, fraud by illegally taking the marital home from the appellant via illegal tactics and bogus court rulings are just a few of the crimes and wrongdoings that the plaintiff and York County authorities have conspired to perpetrate on the appellant.

16) An authentic Christian, the appellant loves and forgives Jacqueline Miller, Judge Colton, the Rock Hill Police Department, York County judiciaries and authorities, and all others who have wrongfully persecuted him in these bogus matters. The appellant simply desires for love, peace, righteousness, and justice to prevail. Hate and racism kills. The hate and racism must stop. By God's grace, the appellant is the change he desires to see in the Rock Hill and York County

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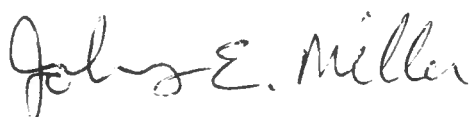
communities, and in the World. Rock Hill is home for the appellant....he was born and raised there.

17) **At the 6 minutes and 50 seconds mark of the recording of record**, the court says that it found the testimony of the respondent, Jacqueline Miller, to be credible. **At the 3 minutes and 10 seconds mark, at the 16 minutes and 40 seconds mark, and at the 24 minutes and 30 seconds mark of the recording of record**, Judge Colton said she ruled by the preponderance of the evidence. Very respectfully submitted, what the court says and/or infers here is 100% illogical if all of the evidence and the recording and testimonies of all the witnesses and parties who testified in the first hearing in this matter on July 24, 2025 are considered. Was not everyone else who testified besides the respondent in the July 24th hearing credible? Were not the affidavits, police reports, and the order from another judge of this court credible? The respondent herself, Jacqueline Miller, was the only person, witness, or party who testified on the behalf of the respondent. The appellant and two other witnesses (Melissa Randall and Marchavis Caldwell) testified on the behalf of Johnny Miller, the appellant. Ms. Randall and Mr. Caldwell testified that they witnessed themselves Jacqueline Miller harassing and stalking the appellant, even within the 6 months period that the Court deceitfully imposed on the appellant's evidence to shield the respondent from being exposed as a consistent patterned perpetuator of harassment, stalking, and other wrongdoings directed at the appellant. In addition to the eyewitness testimonies of Ms. Randall and Mr. Caldwell....seven police reports, a "Request For Action" petition with 18 (eighteen) signatures, nine affidavits from concerned citizens, and a previous order from a judge in this exact same court denying the respondent a restraining order against the appellant.....were all submitted into the record at the July 24, 2025 hearing in support of the appellant. Judge Coton ruled that the single testimony of the respondent outweighed all of this. That decision, very respectfully, is contrary to sound human reasoning and unjust. This is why a malfunction so conveniently occurred that prevented the July 24th hearing from being recorded. Judge Colton ignores the facts and is completely predisposed to rule in the favor of the respondent regardless of anything else. It is factual and historical that a jury decided that the allegation of harassment by the respondent Jacqueline Miller against the appellant Johnny Miller in a closely related matter was untrue and/or bogus....and found the appellant NOT GUILTY. So why and how did this court hear the exact same testimony of all the parties who testified, and yet logically and in good faith grant the bogus restraining order to the respondent without a recording or transcript of the testimonies whereon the court's decision is made because the recording device malfunctioned? This is simply outrageous.

FOR THE FOREGOING REASONS, and many others that this Most Honorable Court may be aware of, this immediate appeal requesting that the judgment granting the restraining order at issue in this immediate matter be vacated and/or reversed should be ruled on in favor of the appellant.

The appellant prays that this most honorable appellate court rules on this matter as expeditiously as possible due to the extraordinary extenuating circumstances surrounding this matter. It is the appellant's belief that the actions of the plaintiff/respondent Jackie Miller, in unison with the Rock Hill Police Department and other York County judiciary officials supporting her....constitute a page taken right out of the Jim Crow era where black people were falsely accused, unjustly fired from their jobs, falsely imprisoned by white oppressors, and their property illegally confiscated from them...all the time prolonging the justice process to destroy the person via financial ruin because he or she would dare stand for justice in the face of civil and racial injustice. The corrupt Judicial System, in cahoots with corrupt attorneys, coerce the oppressed without a job into spending thousands of dollars for legal representation and appeals all for nothing, because truth, justice, and the civil rights of the oppressed are totally ignored, while the corrupt system uses tax-payers money to perpetuate its evil. The actions of the respondent Jackie Miller in this matter with powerful authoritative York County entities supporting her in her evil and illegal ways are tantamount to modern day slavery and a lynching of the appellant, Johnny E. Miller. Very respectfully....the granting of the bogus restraining order at issue in this appeal is simply another form of harassment by York County judiciary officials, and another effort to restrict the appellant's freedom and to control him....in essence, to enslave him. The appellant is 100% innocent in this matter. Thus far, this matter has been a travesty of justice.

Prayerfully and sincerely submitted,



Johnny E. Miller
Appellant (Pro Se)
October 20, 2025

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AFFIDAVIT OF MELISSA RANDALL

Melissa J. Randall
3945 Hazel Downe Way
Rock Hill, SC 29732
(803) 818-1328
randall.melissaj@gmail.com

October 19, 2025

RE: Jaqueline Miller, Respondent v. Johnny E. Miller, Appellant, Case No.
2025OR4610300055Catawba/Ebenezer Magistrate Office

To whom it may concern,

I, Melissa Jenese Randall, a 42 years old Homemaker, married to Ellis Jerome Randall Jr., an ordained Minister in the Body of Jesus Christ, do attest that all the statements herein are true and accurate to the best of my knowledge:

I am a member of The Church at Rock Hill, located at 196 Grayson Road, Rock Hill, South Carolina. I started attending The Church at Rock Hill in the late Spring of 2005 and was baptized into the Church in April of 2006 by Johnny Earl Miller who is the lead minister. I will refer to Johnny Earl Miller as Brother Miller going forward and I will refer to his ex-wife, Jacqueline Brown Miller, as Ms. Miller.

The Church at Rock Hill is a satellite Church of a group of people throughout the United States and other countries that collectively refer to themselves as 'The Body of Jesus Christ'. We try our very best to live in accordance with the teachings and principles set forth in the Holy Bible. During my 20 years membership at the Church, I rented a room for a little over two years from Brother Miller and Ms. Miller, while Brother Miller attended Duke University for his master's degree, approximately from 2006 to 2008.

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I have attended quite a few court proceedings over the last several years in support of Brother Miller purely out of a conviction from God. I observed the Honorable Judge Jennifer Colton preside over two separate hearing this year—one on July, 23, 2025 and one on October 8, 2025. I testified at the July 23rd hearing.

On July 23, 2025, I observed Bro Miller began to make a statement that went back to 2022 recounting Ms. Miller coming to his apartment, secretly photographing him from her car while it was daylight and then video recording him, once it was dark outside from the backside of his apartment. It gave the impression that she spent a good amount of time outside of his residence or left and came back the same day. I am able to attest to this because one of their daughters sent the photo and video recording to our Church members and you can hear Ms. Miller speaking to Brother Miller and his guest from outside his apartment deck in the video. Judge Colton stopped him and asked when the incident occurred Brother Miller told Judge Colton in 2022 and that he was trying to show that Ms. Miller had multiple instances that establishes a pattern of her harassing him. Judge Colton made a stipulation that she would not allow any evidence that preceded the previous six months for the remainder of the hearing. Witnesses were only allowed to recount instances from the past 6 months. During the October 8, 2025 hearing, I witnessed Judge Colton say that Brother Miller asked for the permissible scope of evidence in the July 23, 2025 trial to not exceed the previous six months but I don't recall him making that request.

On July 23rd, I was called to the witness stand, sworn in, and interviewed by Brother Miller who represented himself. I stated my name, my occupation which is a Homemaker, and how I know Brother Miller and Ms. Miller. I testified that I am Church member and I met them both at Church in 2005. I also testified that I lived with them for a little over two years. I testified that on January 20, 2025 I attended the annual MLK Interfaith Prayer Breakfast at First Baptist Church in Rock Hill, South Carolina with my husband and some other members from our Church, including Brother Miller. During the event Brother Miller sat at the same table as my husband and I. Sometime before the event officially started, I witnessed Ms. Miller, who was also in attendance, approach our table in a very exuberant, "extra" way to speak to someone who was seated at our table. Once the person stood to hug her, she pulled them over to the wall which was maybe 3 to 5 feet away from the table and continued to speak to them in a very delighted and animated demeanor. She did not appear

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uncomfortable or apprehensive about approaching the area. Ms. Miller cross-examined me and asked where Mr. Miller was when she approached the table. I responded that I couldn't recall if he was sitting down at the table or standing near it at that specific time.

I think it is also important to add that I witnessed Brother Miller tell Judge Colton one of the reasons he was opposed to the restraining order is because it would impede his right to freely petition the government and common law rights in the event that he needed to seek the help of the local police as Ms. Miller is currently employed there. He also cited that another Judge had previously denied the restraining order specifically for that reason.

Sincerely,

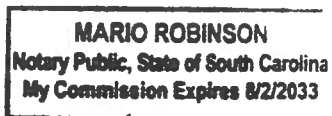
Melissa J. Randall

Melissa J. Randall

Signed on:

Notarization:

Subscribed and sworn to before me on this 19th day of October,
2025, in York County, South Carolina.



Mario Robinson

October 20, 2025

AFFIDAVIT OF MARCHAVIS CALDWELL

RE: Jacqueline Miller, Respondent v. Johnny E Miller, Appellant, Case No.

2025OR4610300055.....Catawba/Ebenezer Magistrate Court

To Whom It May Concern:

I, **Marchavis Caldwell**, being duly sworn, do hereby state the following based on my personal knowledge and recollection regarding the matter of *Jacqueline Miller (Respondent) v. Johnny E. Miller (Appellant)*.

I reside in York County, South Carolina, and serve as a **Pastor** in the local community. I have known both **Jacqueline Miller** and **Johnny E. Miller** for several years through our **church fellowship**.

I was present in court for the hearing on **July 24, 2025**, and also attended the **appeal hearing on October 8, 2025**.

During the July 24, 2025 hearing, **Judge Colton** suggested that both parties could request restraining orders against each other. **Johnny Miller** declined, stating that he had done nothing wrong.

Jacqueline Miller presented her case, alleging that Johnny Miller harassed her at her niece's graduation outing. **Johnny Miller** clarified that the graduation in question was actually his niece's event, (the daughter of his brother), and Jacqueline did not dispute that fact. Jacqueline further claimed that Johnny harassed her and called her a derogatory name at a medical facility where she was residing. Johnny testified that he had been asked by Jacqueline's brother to come to the hospital to assist their mother.

On that day, **Jacqueline Miller did not present any witnesses** other than herself. **Johnny Miller**, however, called two witnesses: **Melissa Randall** and myself.

Ms. Randall testified that during the **MLK Breakfast** earlier that year in Rock Hill, Jacqueline Miller approached the area where Johnny Miller was located and was behaving in an overly dramatic or "extra" manner. During cross-examination, Jacqueline questioned Ms. Randall's account, implying that Ms. Randall was suggesting Jacqueline had crossed the room to approach Johnny. Ms. Randall responded calmly, stating that she did not know where Jacqueline came from.

In my testimony, I recounted an incident from **January 2025**, when a church member informed me that Jacqueline Miller was parked at a building across the street from our church following Sunday service. The building in question houses an Alcoholics Anonymous program. Concerned,

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I looked and saw a white vehicle resembling Jacqueline's. The vehicle soon drove away, but other church members confirmed that it was indeed Jacqueline's car.

During the same hearing, **Judge Colton** stated that Johnny Miller was **not to contact the police department**, which I found troubling. The judge remarked that doing so could potentially violate the restraining order. Johnny responded that he does not encounter Jacqueline at the police department and asked what he should do if he required police assistance. The judge appeared uncertain and struggled to provide a clear answer.

Additionally, certain evidence was not permitted during the **July 24, 2025 hearing**. Specifically, on **September 15, 2022**, Jacqueline Miller sent a series of group messages to several church members. Two members requested to be removed from the communication, but Jacqueline refused, instructing them instead to block her. She continued sending additional messages, including to those who had requested to be excluded. The final message in that thread was sent on **September 26, 2022**. I retain copies of these communications and can provide them upon request.

No official recording was made of the July 24, 2025 hearing, which deeply concerns me. I subsequently filed a **Freedom of Information Act (FOIA)** request with the county and made multiple follow-up attempts to obtain the transcript and exhibits from the case.

- **August 7, 2025:** Initial FOIA request submitted for all transcripts and exhibits from the July 24 hearing. Email also sent to Magistrate court as advised by Karen Brogdon.
- **August 28, 2025:** Second follow-up request submitted.
- **September 10, 2025:** Third follow-up request submitted.
- **September 22, 2025:** I called the Magistrate's Office and spoke with **Erika**, who informed me that **Judge Colton** had my request and was still "considering what to do."

Despite these efforts, I received no response from Judge Colton or the court. I later copied **Congressman Ralph Norman's office** on an email, after which I finally received a reply. When I asked why there had been no prior response, Judge Colton did not provide an explanation. I have these communications saved.

At the **October 8, 2025 appeal hearing**, Judge Colton suggested that Johnny Miller had previously requested that no evidence older than six months be considered during the July 24 hearing. I paid close attention on that date and do **not** recall Johnny making such a request. My recollection is that Judge Colton herself stated she would not hear any matters older than six months.

I am submitting this affidavit to ensure that an accurate record of events and procedural concerns is available for review and to promote transparency and fairness in this matter.

I affirm that the above statements are true and correct to the best of my knowledge and belief.

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Sincerely,



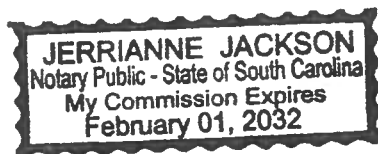
Marchavis Caldwell

1028 Newton Avenue

Rock Hill, SC 29732

864-357-5793

Marchavis.caldwell82@gmail.com

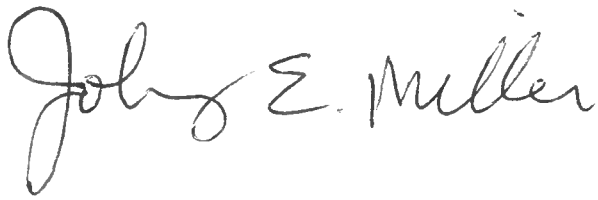


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The undersigned hereby certifies that the Record On Appeal contains all the material proposed to be included by all of the parties and not any other material.

July 20, 2026

A handwritten signature in cursive script that reads "Johnny E. Miller". The signature is written in dark ink and is positioned to the left of the printed name and address.

Johnny E. Miller
1829 Paces River Ave.
Apt. #106
Rock Hill, SC 29732
(803) 517-0378
Appellant_Pro Se