STATE OF SOUTH CAROLINA COUNTY OF HORRY Jane Doe #1 Plaintiff, vs. John-Paul Miller, Reginald Wayne Miller a/k/a Reginal Wayne Miller, All Nations Cathedral Church f/k/a Cathedral Baptist Church of the Grand Strand, Inc., Solid Rock Ministries, Inc. Defendants.	IN THE COURT OF COMMON PLEAS FIFTEENTH JUDICIAL CIRCUIT C/A#: 2025-CP-26- **SUMMONS** **(JURY TRIAL DEMANDED)**

TO: DEFENDANTS AND THEIR COUNSEL:

YOU ARE HEREBY SUMMONED and required to Answer the Complaint in this action, a copy of which is herewith served upon you, and to serve a copy of your Answer to said Complaint on the subscriber at his office at 1539 Health Care Drive, Rock Hill, South Carolina, 29732, within thirty (30) days from the service hereof, exclusive of the date of such service; and if you fail to Answer the Complaint within the time aforesaid, judgment by default will be rendered against you for the relief demanded in the Complaint.

MCGOWAN, HOOD, FELDER & PHILLIPS, LLC

s/S. Randall Hood
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February 25, 2025
Rock Hill, South Carolina

STATE OF SOUTH CAROLINA COUNTY OF HORRY Jane Doe #1 Plaintiff, vs. John-Paul Miller, Reginald Wayne Miller a/k/a Reginal Wayne Miller, All Nations Cathedral Church f/k/a Cathedral Baptist Church of the Grand Strand, Inc., Solid Rock Ministries, Inc. Defendants.	IN THE COURT OF COMMON PLEAS FIFTEENTH JUDICIAL CIRCUIT C/A#: 2025-CP-26- **COMPLAINT** **(JURY TRIAL DEMANDED)**

COMES NOW the Plaintiff, who demands a jury trial of all matters triable to a jury, would allege as follows:

SUMMARY

1. For years, John-Paul Miller (hereafter "JPM") and Reginald Wayne Miller, also known as Reginal Wayne Miller ("RWM"), have presented themselves as devout religious leaders.

2. They built their reputations in the Myrtle Beach community and beyond as men of faith, dedicated to spreading God's word and training future church leaders.

3. But this image was a lie.

4. Behind their religious façade, John-Paul Miller and Reginald Wayne Miller engaged in sexual abuse and predatory conduct—often targeting minors.

5. They used their positions of power to manipulate and exploit vulnerable victims while concealing their actions from the public.

6. Upon information and belief, this deception has shielded them from law enforcement scrutiny, allowing their misconduct to continue unchecked.

7. Reginald Wayne Miller founded Cathedral Baptist Church of the Grand Strand, Inc., along with several other religious and educational institutions.

8. RWM's son, JPM, followed in his father's footsteps and took over RWM's religious empire.

9. Upon information and belief, these institutions were not created to only serve God, but to further Miller and John-Paul Miller's predatory behavior.

10. The churches and their related entities operated without adequate protections for minors, creating an environment where abuse could thrive.

11. Upon information and belief, this was not accidental—it was part of a calculated plan to groom victims while simultaneously gaining the community's trust and financial support.

12. Recently, the death of John-Paul Miller's ex-wife, Mica Frances Miller, has once again drawn attention to both John-Paul Miller and Reginald Wayne Miller.

13. Mica Frances Miller's relationship with John-Paul Miller was deeply troubled.

14. Upon information and belief, it exemplified the power and control he exercised over women in the church.

15. As detailed in this Complaint, the Defendants—both individually and together—have built, maintained, and concealed a system of sexual misconduct that harmed numerous minors, including Plaintiff Jane Doe #1.

PARTIES

Plaintiff

16. Plaintiff Jane Doe #1 (hereinafter, "J.D., or Doe") is a person now over the age of Eighteen (18), but she was a minor at the time of the majority of events giving rise to causes of actions alleged in this complaint.

17. The Plaintiff Jane Doe #1 is now a citizen and resident of Indiana.

18. Plaintiff is filing this action anonymously under the pseudonym Jane Doe #1 because the subject matter of this lawsuit could bring embarrassment and publicity to the Plaintiffs.

19. Plaintiff Jane Doe #1 risks humiliation and embarrassment if she is identified since some of her allegations involve descriptions of sexual acts foisted upon her and allowing her to proceed with a pseudonym brings her comfort.

20. If the ability to proceed with a pseudonym is not allowed, the Plaintiff will experience further harm because of exercising her legal rights.

21. If Plaintiff is forced to disclose her identity, that disclosure will amplify the injuries that are at issue in this litigation.

22. The public interest in the disclosure of Plaintiff's identity is minimal and not outweighed by the substantial harm of revealing her identity.

23. There will be no furtherance of justice by requiring the public disclosure of Plaintiff.

24. Once the Defendants are served and retain counsel, Plaintiff's identity will be revealed to Defendants in a confidential manner, if not already known.

25. Defendants are not prejudiced by allowing Plaintiff to proceed anonymously, and any potential prejudice will be mitigated by the confidential disclosure of Plaintiff's actual identity soon after this lawsuit is filed.

Defendants

26. Upon information and belief, Defendant John-Paul Miller (hereinafter, "JPM") is a citizen and resident of the State of South Carolina and is currently the Pastor at Solid Rock Ministries in Myrtle Beach, South Carolina.

27. At all times involved in this action, JPM was a Pastor in Myrtle Beach, South Carolina, either at All Nations Cathedral Church (hereinafter "All Nations') (formerly Cathedral Baptist Church of the Grand Strand, Inc. (hereinafter, "Cathedral)) or Solid Rock Ministries (hereinafter, "Solid Rock").

28. Whether JPM was working or involved in some type of employment or agency capacity with at All Nations, Cathedral or Solid Rock, they were all the same enterprise and JPM was the alter ego of All Nations, Cathedral; and Solid Rock.

29. Defendant JPM was a man over the age of eighteen at all times involved in this action.

30. Upon information and belief, Defendant Reginald Wayne Miller (hereinafter, "RWM") is a citizen and resident of the State of South Carolina and was the Head Pastor of All Nations and/or Cathedral at the time of some of the allegations contained herein.

31. Defendant Reginald Wayne Miller is the father of JPM.

32. Upon information and belief, Defendant Reginald Wayne Miller has also referred to himself as Reginal Wayne Miller as a way to hide prior transgressions.

33. Upon information and belief, Defendant All Nations Cathedral Church is a continuation of Cathedral Baptist Church of the Grand Strand, Inc., and is organized and existing under the laws of the State of South Carolina.

34. All Nations is the successor in interest of Cathedral and assumed all of its assets and liabilities.

35. All Nations and Cathedral will be referred to throughout this complaint as one intertwined entity known as "Cathedral"

36. JPM and RWM, as the alter egos of Cathedral, All Nations, and Solid Rock, exercised complete control over the operations, finances, and leadership of all three organizations, effectively consolidating them into a single, unified entity that is indistinguishable from one another.

37. Even if any Defendant claims to be a charitable entity, upon information and belief, JPM and RWM exercised complete control over Cathedral and Solid Rock without adhering to proper corporate formalities, using the churches as fronts to funnel funds for their own personal financial gain rather than for legitimate charitable or religious purposes.

38. Each act of any named Defendant or identified actions of employees and/or agents of any Defendants identified in this action were performed within the course and scope of any respective duty or employment capacity.

39. Each act of negligence, gross negligence, recklessness, and/or willful and wanton conduct by any person employed by any Defendant or any Defendant is an act or occurrence under the South Carolina Tort Claims Act.

40. Defendants' negligent, grossly negligent, reckless, willful, or wanton acts, omissions, and liability includes that of their agents, principals, employees, and/or servants, both directly and vicariously, pursuant to principals of non-delegable duty, corporate liability, apparent authority, agency, ostensible agency, and/or respondeat superior.

41. Defendants have duties and responsibilities to direct and control the way Cathedral and Solid Rock agents and/or employees provide secular services to minors and their parents.

42. Defendants have duties and responsibilities to protect minor children from foreseeable harm.

43. Defendants Cathedral, Solid Rock, John-Paul Miller, and Reginald Wayne Miller have the right or power to direct and control the way their employees and/or agents train, monitor, and supervise staff under their employment or agency.

44. Defendants Cathedral, Solid Rock, John-Paul Miller, and Reginald Wayne Miller had a duty to establish, implement, and enforce policies and procedures to protect minor children from foreseeable harm within their churches.

45. This duty included creating and maintaining clear guidelines on hiring, supervision, monitoring, and training of staff and volunteers to ensure that all adult members interacting with minors were properly vetted and adequately trained in recognizing, preventing, and reporting predatory behavior.

46. Training on policies, procedures, safety features, supervisory responsibility, and predatory behavior should have included employees of Cathedral and Solid Rock, the parents of minor children, and the children themselves.

47. Defendants were responsible for developing and enforcing non-ecclesiastical policies and procedures to regulate the conduct of adult church members, ensuring that minors were not placed in vulnerable situations where they could be exploited or abused.

48. Despite the inherent risks associated with minors in a church, youth programs and church-based mentorship, Defendants failed to implement common-sense safeguards, such as prohibiting one-on-one unsupervised interactions between adults and minors, requiring background checks for all staff and volunteers, and establishing mandatory reporting protocols for suspected abuse.

49. Defendants misrepresented the safety of the church to minors and their families, creating the false impression that Cathedral, Solid Rock, and their affiliated programs were safe environments for children.

50. By promoting the church as a place of trust and spiritual guidance while neglecting to put adequate protective measures in place, Defendants knowingly placed minors at risk of harm.

51. Their failure to create and enforce proper policies was not only negligent but reckless and willful, as they ignored clear warning signs and failed to warn minors and their families about the dangers within the church.

52. These failures directly contributed to the exploitation and abuse that occurred, making Defendants liable for the harm suffered by Plaintiff and other victims.

53. Defendants Cathedral, Solid Rock, John-Paul Miller, and Reginald Wayne Miller had a duty to provide employees and/or agents with adequate knowledge and training to prevent the exploitation and abuse of minor children within the church while present on the premises or in a church-sponsored youth program.

54. Some duties of Cathedral, Solid Rock, John-Paul Miller, and Reginald Wayne Miller included identifying inappropriate non-ecclesiastical behavior in adult staff, members, or volunteers and immediately reporting such behavior to designated entities, including law enforcement.

55. Before the events underlying this case began in the 1998 Defendants had actual knowledge that a vulnerable population of children or young adults attending the church and on the premises and participating in the youth programs would be at risk of exploitation or abuse if reasonable precautions were not taken in training, supervision, and monitoring of staff, members, or volunteers.

56. This is because RWM had already been exposed as a predator and his JPM was following along in his steps in being a predator.

57. Cathedral, Solid Rock, and their employees and/or agents had the opportunity to prevent harm against vulnerable children.

58. Yet, Defendants Cathedral and Solid Rock, along with their employees and/or agents, ignored clear warning signs of minors being sexual exploited or abuse by church staff, members, or volunteers.

59. The leadership of Cathedral and Solid Rock was frontloaded into power by RWM and JPM in their church bylaws which gave them complete control.

60. At all times relevant hereto, John-Paul Miller, Reginald Wayne Miller, and others (with respect to the facts alleged herein) acted within the course and scope of their employment and/or agency with Defendants Cathedral and Solid Rock.

61. Defendants knew that minor children exposed to emotional abuse, sexual misconduct, or exploitation were at risk of severe and lifelong harm.

62. Defendants also knew that if children were subjected to these abuses, they would sustain deep emotional trauma and long-term behavioral difficulties.

63. The negligent, grossly negligent, reckless, willful, or wanton acts, omissions, and liability of Defendants include those of their agents, principals, employees, and/or servants, both directly and vicariously, pursuant to principles of non-delegable duty, corporate liability, apparent authority, agency, ostensible agency, and/or respondeat superior

JURISDICTION AND VENUE

64. The Plaintiff resides in Indiana.

65. At least one Defendant is located in or has its principal place of business in Horry County, South Carolina.

66. A primary portion of the facts alleged in this matter occurred in Horry County, South Carolina.

67. Each Defendant interacted with South Carolina in a systemic and pervasive way, such that this Court may exercise personal jurisdiction without offending the notions of justice.

68. Each of the Defendants has a present and lasting contact with the State of South Carolina by virtue of revenue, ownership of land, or other qualifying state jurisdictional criteria.

69. Though there is diversity of jurisdiction between parties, the Defendants are being sued in their county of residence pursuant to the Home State Rule.

JOINT AND SEVERAL LIABILITY

70. The above-named Defendants are jointly and severally liable for all damages alleged herein since their negligent, grossly negligent, reckless, and wanton acts and omissions, singularly, or in combination, are the contributing proximate causes of Plaintiffs' injuries, damages, and losses.

ALTER EGO OF CATHEDRAL AND SOLID ROCK – JPM AND RWM

71. Plaintiff is informed and believes that Defendants Cathedral and Solid Rock along with their respective leaders, including John-Paul Miller and Reginald Wayne Miller, have operated in such a manner that they should be regarded as a single entity for purposes of liability.

72. Despite any nominal corporate formalities, these Defendants have failed to observe the corporate distinction between Cathedral, All Nations and Solid Rock and their individual officers, members, and managers (especially, including RWM and JPM).

73. JPM and RWM exercised complete domination and control over the financial, operational, and decision-making affairs of Cathedral and Solid Rock.

74. Defendants JPM and RWM disregarded corporate formalities, exerted unilateral decision-making authority, and used the entities as a mere extension of their personal financial and operational control.

75. The acts of Cathedral and Solid Rock should be regarded as the acts of their decision-makers and financial beneficiaries, Defendants JPM and RWM.

CHARITABLE IMMUNITY & LIABILITY CAPS

76. Defendants Cathedral and Solid Rock will likely claim to be charitable entities, which would subject them to charitable immunity caps.

77. The Charitable Immunity Act ("CIA") references the South Carolina Tort Claims Act as the predicate statutory authority for the number of caps to be imposed by any person or entity against a CIA entity.

78. In relevant part, regarding limitations of liability under the South Carolina Tort Claims Act ("TCA"), S.C. Code Ann. Section 15-78-120 provides:

> (a) For any action or claim for damages brought under this chapter, the liability shall not exceed the following limits:
>
> (1) Except as provided in Section 15-78-120(a)(3), no person shall recover in any action or claim brought hereunder a sum exceeding three hundred thousand dollars because of loss arising from a single occurrence, regardless of the number of agencies or political subdivisions involved.
>
> (2) Except as provided in Section 15-78-120(a)(4), the total sum recovered arising out of a single occurrence shall not exceed six hundred thousand dollars, regardless of the number of agencies, political subdivisions, claims, or actions involved.

79. Under S.C. Code Ann. Section 15-78-30, an "occurrence" is defined as "an unfolding sequence of events which proximately flow from a single act of negligence."

80. Each act of negligence, gross negligence, recklessness, and/or willful and wanton conduct by any person employed by or an agent of Cathedral and Solid Rock constitutes an act or occurrence under the South Carolina Tort Claims Act/CIA.

81. There are multiple breaches of duties of care and industry standards in this case.

82. Each breach (or occurrence) can be stacked to create multiple "caps" for any Defendant under the TCA/CIA, depending on a jury's findings.

83. RWM and JPM are alleged to have committed grossly negligent or reckless acts and/or omissions in their individual capacities.

84. If a jury finds RWM or JPM grossly negligent or reckless in regard to their actions with Jane Doe #1, they are subject to liability outside of any "cap" and face unlimited exposure for damages.

85. Plaintiff has identified multiple breaches of duty by Defendants and their agents and/or employees.

86. Other breaches may exist that are unknown at this time.

STATUTE OF LIMITATIONS AND PLAINTIFFS RIGHT TO BRING THIS CLAIM

87. Statutory time bars on the filing of civil suits have exceptions.

88. In some cases, plaintiffs do not know when a wrong occurred and may not discover their cause of action until years after the statute of limitations has expired.

89. In response to such cases, courts and state legislatures fashioned the discovery rule to prevent the injustice which would result from the strict application of the statute of limitations.

90. This doctrine balances the unfairness faced by a plaintiff who is deprived of a verdict against the harm suffered by a defendant in letting the case go to trial after a long delay.

91. The discovery rule has been applied to cases in which survivors of childhood sexual abuse have repressed the memory of the abuse.

92. In South Carolina, the discovery rule is applied to all cases of childhood sexual abuse before the year 2001.

93. In 2001, the South Carolina Legislature enacted S.C. Code § 15-3-555, which extends the statute of limitations for survivors of childhood sexual abuse, allowing them to file civil claims up to six years after turning 21 or within three years of discovering that their injuries were caused by the abuse.

94. This tolling provision recognizes the psychological impact of childhood sexual abuse, particularly cases involving repressed memories or delayed awareness of harm, ensuring that survivors have a fair opportunity to seek justice.

95. In this matter, the first abuse to Jane Doe #1 happened in 1998, but she was still a minor when the legislation was passed in 2001.

96. Regardless of which standard applies, the statute of limitations has not expired regarding the claims of Jane Doe #1 against any of the Defendants.

97. When applying the discovery rule (pre 2001) in cases of previously repressed memories of childhood sexual abuse, courts balance the harm of denying a remedy to a plaintiff who had no access to her memory against the hardships faced by a defendant defending against such longstanding claims.

98. Some courts have applied the discovery rule to toll the applicable statute of limitations for the period during which a victim repressed the memory of the sexual abuse. See Johnson v. Johnson, 701 F.Supp. 1363 (N.D.Ill.1988) (superseded by statute) (finding Illinois courts would apply discovery rule when plaintiff has psychologically repressed memories of

childhood sexual abuse); Hoult v. Hoult, 792 F.Supp. 143 (D.Mass.1992) (applying discovery rule where plaintiff repressed memory of sexual abuse until after expiration of statute of limitations); Nicolette v. Carey, 751 F.Supp. 695 (W.D.Mich.1990) (holding daughter's claim against her father was tolled until she filed suit as daughter showed she had repressed memory of alleged sexual abuse); Doe v. Roe, 191 Ariz. 313, 955 P.2d 951 (1998) (discovery rule applies to delay accrual of cause of action based on childhood sexual abuse when plaintiff retrieves repressed memories of the abuse; court applied discovery rule to action brought by woman against her parents for acts of sexual abuse which allegedly occurred when she was between ages of 8 and 15, but memories of which were repressed by woman until she was 34 years old); Mary D. v. John D., 264 Cal.Rptr. 633 (Cal.Ct.App.1989) (court held discovery rule may be applied in case where plaintiff can establish lack of memory of sexual abuse due to psychological repression which took place before plaintiff obtained age of majority, and which caused plaintiff to forget facts of acts of abuse until date subsequent to which complaint is timely filed); Farris v. Compton, 652 A.2d 49 (D.C.1994) (discovery rule applicable in case of total repression of memory of childhood sexual abuse); Peterson v. Huso, 552 N.W.2d 83 (N.D.1996) (discovery rule tolled statute of limitations until adult victim of alleged childhood sexual abuse, who claimed her memories of the abuse had been repressed until recalled over twenty years later, discovered the abuse); McCollum v. D'Arcy, 138 N.H. 285, 638 A.2d 797 (1994) (court applied discovery rule to toll statute of limitations where fifty year old daughter brought sexual assault action against her parents and asserted she repressed all memory of childhood sexual abuse, despite lack of corroborating evidence of the abuse); Ault v. Jasko, 70 Ohio St.3d 114, 637 N.E.2d 870 (1994) (discovery rule applies to toll statute of limitations where victim of childhood sexual abuse represses memory of that abuse).

99. A victim whose memory is inaccessible lacks conscious awareness of the event and thus doesn't know the facts giving rise to the cause of their emotional injuries.

100. Repressed memory does not mean that a survivor immediately forgets the abuse at the time it occurs.

101. Instead, various psychological and emotional factors—such as trauma, fear, coercion, or dissociation—may cause the memory to become gradually suppressed over time, often as a subconscious coping mechanism.

102. This repression can be reinforced by grooming, manipulation, or external pressures, leading the survivor to minimize or disconnect from the abuse without fully realizing its impact.

103. Under South Carolina law, if the memory of the abuse becomes repressed while the survivor is still a minor, the statute of limitations is tolled until the memory resurfaces and the survivor becomes aware of the abuse and its effects.

104. This means that the legal clock does not start running until the survivor consciously recalls the abuse and recognizes its connection to their psychological injuries, ensuring that victims are not unfairly barred from seeking justice due to the complex nature of trauma and memory repression.

105. In Moriarty v. Garden Sanctuary Church of God, 334 S.C. 150, 511 S.E.2d 699 (Ct. App. 1999), the South Carolina Court of Appeals opined that the discovery rule may toll the statute of limitations during the period a victim psychologically represses her memory of sexual abuse.

106. In Moriarity, the court concluded that a case with allegations of repressed memory is distinguishable from Doe v. R.D., 308 S.C. 139, 417 S.E.2d 541 (1992)

107. Jane Doe's realization of the 1998 assault and its effects were repressed at some time after the assault but before turning eighteen (18) and her recollection of the 1998 assault did

not trigger and re-emerge until after a 2023 assault by JPM, meaning that her cause of action for the 1998 assault only accrued in 2023.

108. Because Jane Doe #1 was unable to recognize the connection between the prior abuse and her ongoing trauma until the 2023 assault by JPM, her claim is timely under the discovery rule.

109. If this claim is decided under the statute of limitations as delineated by S.C. Code § 15-3-555, the three year statute of limitations under that legislation does not begin to run until 2023, when Plaintiff discovered that her injuries were caused by JPM's abuse.

SEPARATION OF CHURCH AND STATE & ECCLESIASTICAL PRIVILEGE

110. The First Amendment to the United States Constitution guarantees religious freedom and the separation of church and state.

111. Religious organizations are granted independence from secular control or manipulation, ensuring they can determine matters of church government, faith, and doctrine without state interference. See *Kedroff v. St. Nicholas Cathedral*, 344 U.S. 94, 116, 73 S.Ct. 143, 97 L.Ed. 120 (1952).

112. South Carolina courts recognize that civil courts "may not engage in resolving disputes as to religious law, principle, doctrine, discipline, custom, or administration." *Pearson v. Church of God*, 325 S.C. 45, 52, 478 S.E.2d 849, 853 (1996).

113. However, South Carolina courts also recognize that civil courts may hear cases involving religious organizations if the dispute can be resolved using neutral principles of law. See *id.* at 51–53, 478 S.E.2d at 852–53.

114. Under the neutral principles of law approach, courts may apply property, corporate, and other secular laws to church disputes. *All Saints Parish Waccamaw v. Protestant Episcopal Church in Diocese of S.C.*, 385 S.C. 428, 444, 685 S.E.2d 163, 172 (2009).

115. Courts retain jurisdiction over cases where religious doctrine is not at issue.

116. Certain ecclesiastical actions are privileged or immune from civil liability, while others are not.

117. The actions of church employees or agents may be both ecclesiastical and secular.

118. Preaching a sermon to minor children is ecclesiastical in nature and subject to First Amendment privilege.

119. Molesting a child during a sermon is subject to neutral principles of law and falls within civil court jurisdiction and outside First Amendment privilege.

120. Ecclesiastical polity refers to the governance structure of a church, church school, or Christian denomination.

121. Churches sometimes attempt to classify issues as ecclesiastical when, in reality, they involve secular legal principles and neutral principles of law.

122. There is a clear distinction between ecclesiastical matters related to religious doctrine and secular legal duties that fall under civil court jurisdiction.

123. While allowing John-Paul Miller to be a church leader may involve ecclesiastical considerations, the training, supervision, and monitoring of Miller to prevent the abuse of minors is a secular obligation governed by neutral principles of law, which Defendants failed to uphold.

124. The actions and behavior of a church entity and its agents must be analyzed to determine whether civil courts may intervene based on neutral principles of law.

THE EVOLUTION OF RWM, JPM AND THEIR VARIOUS MINISTRIES

125. Reginald Wayne Miller's ministerial journey began in the early 1970s in Florence, South Carolina.

126. In 1972, he founded the Florence Tabernacle Church, an independent congregation that quickly expanded its reach through various ministries.

127. By the mid-1970s, Miller had established the Gloryland Bible College, later known as Cathedral Bible College, aiming to train individuals for Christian service.

128. Miller's prominence grew with his regional television program, "Good Morning Jesus," which aired across multiple states and into Canada.

129. However, his career faced significant challenges in the late 1980s.

130. On February 1989, WPDE TV-15, a local television station, aired a five-part investigative report detailing allegations of sexual misconduct involving RWM and students from his Bible college.

131. In response to the mounting controversies and declining support in Florence, Miller relocated his ministry to Myrtle Beach, South Carolina, in 1993.

132. There, he rebranded his organization as Cathedral Baptist Church and sought to establish a new campus.

133. He acquired the former Myrtle Beach Air Force Base chapel in 1995, intending to expand his church and college operations.

134. Cathedral Baptist Church of the Grand Strand ("Cathedral") was the primary religious organization established by Reginald Wayne Miller ("RWM") after relocating his ministry from Florence, South Carolina, to Myrtle Beach in the early 1990s.

135. RWM was forced to rebrand his ministry after the allegations and public scrutiny in Florence, but RWM maintained his same control over church operations, finances, and leadership.

136. Cathedral served as the foundation for RWM's continued influence, providing him with direct access to congregants, financial resources, and leadership over affiliated religious institutions.

137. Over time, in an effort to further distance himself from prior controversies and to maintain operational continuity under a new identity, Cathedral changed names and identities to "All Nations Church" while remaining under the same centralized control of RWM and his inner circle.

138. The structural change in name did not alter the reality that All Nations was a continuation of Cathedral, inheriting its assets, congregation, and leadership hierarchy

139. Despite the formal changes in name and branding, All Nations remained functionally identical to Cathedral, operating under the same governance and with the same leadership.

140. The church's physical assets, including the former Myrtle Beach Air Force Base chapel, were controlled by the Miller family throughout these transitions.

141. In 2013, the chapel was formally transferred from All Nations (formerly Cathedral) to Solid Rock Ministries, which had been formed by John-Paul Miller ("JPM"), RWM's son, in 2006.

142. Though the names have changed over the years, Cathedral Baptist Church, All Nations Church, and Solid Rock Ministries are not separate and distinct entities but rather a continuing joint enterprise under the exclusive control of RWM and JPM., evolving over time

through strategic name changes and restructuring to maintain their influence, evade scrutiny, and shield assets from liability.

143. Despite changes in corporate identity, these churches have shared leadership, financial resources, governance structures, and a common purpose, making them functionally interchangeable and indistinguishable from one another.

144. Each successive entity has absorbed the assets, congregation, and leadership of its predecessor, with RWM and JPM maintaining absolute control over operations, finances, and policies.

145. The rebranding from Cathedral Baptist Church to All Nations Church and the later transfer of key properties, including the former Air Force chapel, to Solid Rock Ministries did not alter the underlying reality that these organizations function as one continuous enterprise under the Millers' authority.

146. Rather than representing legitimate, independent religious organizations, they serve as alter egos of RWM and JPM, operating as a unified enterprise designed to preserve their power, protect them from liability, and continue their control over vulnerable members of their congregation.

DUTIES OF CATHEDRAL, SOLID ROCK, JPM AND RWM TO PLAINTIFF

147. Defendants Cathedral, Solid Rock, Reginald Wayne Miller, and John-Paul Miller owed duties to the Plaintiffs.

148. Defendant Reginald Miller and John Paul Miller were employees and agents of Cathedral and Solid Rock during all times referenced in this complaint.

149. In South Carolina, a duty of care may arise from various sources, including special relationships, common law recognized duty, voluntary undertakings, and statutory obligations.

150. In this case, Defendants Cathedral Baptist Church, Solid Rock Ministries, Reginald Wayne Miller, and John-Paul Miller owed legally cognizable duties to Plaintiff and other minor children who participated in their youth programs or attended their church.

151. These duties arose from the special relationship between Defendants and the minors in their care, as the church understood that children were allowed to be present at different places on the premises, including the sanctuary, or youth program which all are under church leadership.

152. This freedom to roam of children placed them under the direct supervision and authority of adult mentors and church leaders.

153. By assuming responsibility for minors in a structured setting, Defendants acted in loco parentis, meaning they took on a duty akin to that of a legal guardian to protect and safeguard the children from foreseeable harm.

154. This duty extended beyond spiritual guidance and mentorship, creating a legal obligation to ensure a safe environment free from abuse, exploitation, and predatory behavior.

155. Defendants Cathedral, Solid Rock, Reginald Wayne Miller, and John-Paul Miller affirmatively assured parents that their children would be safe while participating in church activities, reinforcing their duty to provide reasonable protection. Although Defendants were not initially required by law to establish formal policies regarding youth safety, upon information and belief, they voluntarily undertook this responsibility by implementing various policies and procedures governing staff conduct and adult interactions with minors.

156. Under Section 323 of the Restatement (Second) of Torts, which is recognized in South Carolina law, once Defendants assumed this duty, they were legally required to exercise reasonable care in enforcing their policies and ensuring the safety of minors on the church campus.

157. By failing to implement, communicate, and reasonably enforce policies to prevent abuse, Defendants breached their duty of care, making them legally liable for the harm suffered by Plaintiff and other vulnerable children in their programs.

158. Defendants Cathedral Baptist Church, All Nations Church, Solid Rock Ministries, Reginald Wayne Miller, and John-Paul Miller had a common law duty to properly hire, supervise, monitor, oversee, and train their employees, agents, and volunteers who interacted with minors in their church programs and at the church.

159. Given their role in placing adults in positions of trust and authority over children, Defendants had a duty to exercise reasonable care in selecting, training, and supervising individuals entrusted with the safety and well-being of minors.

160. This duty required Defendants to conduct background checks, implement safeguards to prevent foreseeable harm, monitor adult interactions with minors, and enforce policies designed to prevent abuse and exploitation.

161. By failing to establish and enforce reasonable hiring, supervision, monitoring, and training protocols, Defendants created an environment where children were placed at an increased risk of harm, including the abuse suffered by Plaintiff.

162. Their failure to properly vet employees and agents, failure to monitor interactions between adults and minors, and failure to act in response to warning signs of misconduct constituted a breach of their legal duty, directly contributing to the harm inflicted upon Plaintiff and other vulnerable children under their care.

163. In the present case, Defendants Cathedral Baptist Church, All Nations Church, Solid Rock Ministries, Reginald Wayne Miller, and John-Paul Miller had a legal duty to protect

minors from known dangers and foreseeable hazards, including the presence of sexual predators within their church community.

164. Under South Carolina law, when an entity becomes aware—or should reasonably be aware—of the danger, it has a duty to take action to prevent harm to those under its care.

165. Defendants were in a unique position of authority and control over the church environment, and they either knew or should have known that predators, including John-Paul Miller and Reginald Wayne Miller, posed a serious risk to minors at church either on the premises or in the church's youth programs.

166. Despite having knowledge of prior allegations and incidents of sexual misconduct, Defendants failed to act, failed to implement reasonable protective measures, and failed to warn grandparents, parents and children about the dangers present within the church.

167. By allowing known or suspected predators to remain in leadership positions, Defendants affirmatively placed minors in harm's way, increased their exposure to exploitation, and created an environment where abuse could occur unchecked.

168. Their failure to intervene, failure to warn, and failure to remove dangerous individuals from positions of authority constituted a breach of their duty, directly contributing to the harm suffered by Plaintiff and other vulnerable children.

169. The Defendants had a common law duty of hiring, supervision, monitoring, oversight and training of their employees and or agents.

170. These duties were established by South Carolina common law, statutory law, federal law, and Defendants' own actions.

171. The widespread sexual abuse scandals within the Catholic Church, which gained significant public attention during the 1980s and 1990s, underscored the critical need for religious institutions to recognize and address the presence of predators in their midst.

172. These revelations prompted a broader awareness among various denominations about the imperative to implement robust child protection measures.

173. Given the publicized allegations against Reginald Wayne Miller in 1989, the leadership of Cathedral Baptist Church, All Nations Church, and Solid Rock Ministries had a heightened responsibility to implement stringent protective measures.

174. Awareness of such allegations should have compelled these institutions to establish and enforce comprehensive policies, including thorough background checks, mandatory abuse prevention training, and clear reporting procedures, to safeguard the children under their care.

175. Failure to adopt these industry-standard protections ONCE ON NOTICE OF A POTENTIAL PREDATOR, especially in light of known risks, constitutes a breach of their duty to provide a safe environment for minors.

DEFENDANTS' KNOWLEDGE OF PRIOR SEXUAL MISCONDUCT AND EMOTIONAL ABUSE

176. Plaintiff is informed and believes, based on multiple sworn affidavits, that John-Paul Miller ("JPM") and Reginald Wayne Miller ("RWM") had longstanding knowledge of sexual misconduct, emotional abuse, and exploitation of minors within their church community long before the incidents alleged in this complaint occurred in 1998 and 2023.

177. Despite their awareness, they failed to take appropriate action, allowing the cycle of abuse to continue unchecked.

Knowledge of John-Paul Miller's Sexual Misconduct with Minors

178. Plaintiff is informed and believes that JPM openly admitted to engaging in sexual misconduct with minor female members of Solid Rock Ministries, an admission that was corroborated by multiple witnesses.

179. In her sworn affidavit, Alison Williams (formerly Miller) testified that JPM confessed to her that he had been sexually inappropriate with several underage female members of their church (Exhibit 1 - Williams Affidavit, ¶ 7)

180. JPM attempted to justify his behavior by blaming his own history of childhood sexual abuse by his father, RWM.

181. Williams' affidavit further states that when JPM's sexual misconduct became known to the church leadership, he was ordered to enroll in a sexual addiction rehabilitation program. (Williams Affidavit, ¶ 7)

182. However, upon information and belief, he never complied (Williams Affidavit, ¶ 7)

183. Rather than ensuring the safety of minors within the congregation, JPM and church leadership worked to suppress the allegations and silence victims, enabling his continued leadership within the church.

184. This failure to investigate and allowing JPM to maintain access to young congregants allowed him to continue his predatory behavior.

Prior Allegations of Sexual Misconduct and Abuse by Reginald Wayne Miller

185. Plaintiff is informed and believes that RWM's predatory behavior spans decades and that his son, JPM, learned and adopted his father's abusive practices.

186. In her sworn affidavit, Susan Miller, RWM's ex-wife, detailed how RWM physically and emotionally abused his family and exercised absolute control over both his household and his church congregation (Exhibit 2 - Susan Miller Affidavit, ¶¶ 6, 8, 12-13).

187. Susan Miller attested that RWM's obsession with power and control extended beyond his immediate family and into the church, where he engaged in inappropriate relationships with young men and women, many of whom were vulnerable members of the congregation (Susan Miller Affidavit, ¶¶ 15-16)

188. Additionally, RWM was publicly accused of sexual misconduct in a televised news investigation, which aired allegations that he sexually preyed on young men from his congregation (Susan Miller Affidavit, ¶ 16)

189. This report forced RWM to relocate from Florence, South Carolina, to Myrtle Beach in an effort to escape scrutiny and rebuild his religious enterprise under a new name, Cathedral Baptist Church of the Grand Strand, now known as All Nations Church. (Susan Miller Affidavit, ¶ 17)

190. Despite the overwhelming evidence of prior misconduct, JPM and RWM continued to operate their churches without meaningful oversight, failing to implement or enforce policies to protect minors from exploitation.

Deliberate Suppression of Abuse Allegations and Institutional Cover-Up

191. Both JPM and RWM strategically used their religious authority to suppress allegations and discourage victims from coming forward.

192. As noted in the Alison Williams Affidavit, JPM's inappropriate sexual behavior with minors was widely known among church leaders, yet they took no effective action to prevent further abuse.

193. Instead, JPM manipulated or ignored church policies and leadership structures to shield themselves from accountability (Williams Affidavit, ¶¶ 8-9)

194. The Defendants' and church leaders' failure to take corrective action regarding John-Paul Miller's known predatory behavior, combined with their continued allowance of Reginald Wayne Miller to lead a church despite past allegations, fostered a culture of complicity.

195. This inaction created an environment where sexual misconduct was tolerated, enabling abuse to flourish within Cathedral and Solid Rock, contributing, in part, to the harm suffered by Plaintiff Jane Doe #1.

FACTUAL ALLEGATIONS SUPPORTING THE CAUSES OF ACTION

196. By 2023, JPM had positioned himself as a high-ranking pastor of a large congregation, presenting himself as a spiritual leader while continuing to engage in predatory behavior.

197. In 2023, Plaintiff encountered JPM in person in Myrtle Beach while accompanied by a friend.

198. Despite being in a public setting, JPM leaned into Jane Doe #1 as if to hug her and shoved his hand down her pants touching her genitals without consent.

199. Plaintiff immediately recoiled and tried to brush it off and moved his hand because she didn't think her friend noticed and she was scared

200. About 30 minutes later, Jane Doe #1 and JPM had a heated argument about him using his title of "pastor" and use scripture to justify sexual misconduct.

201. In response, JPM cited scripture, telling Plaintiff: "No man is without sin and temptation. God understands that."

202. Plaintiff was left reeling from the encounter, experiencing a long-delayed spiral of self-doubt and depression caused by this fresh assault on her by JPM.

203. This sexual assault by JPM triggered repressed memories of Plaintiff of things which occurred at an earlier time.

204. Upon later reflection and trying to remember previous events, the plaintiff realized that JPM had assaulted her almost twenty years before.

205. Jane Doe was #1 sexually assaulted at the age of 15 in 1998 by JPM.

206. At the time, she did not fully comprehend the nature of what had happened to her or the extent of the harm it caused.

207. The trauma was deeply buried, and for decades, she had no conscious recollection of the assault.

208. The Plaintiff lost her memory before she turned eighteen (18) likely within a few months or a year of the occurrence of the 1998 assault.

209. It was not until she experienced another sexual assault in 2023 by JPM that the suppressed memories of the 1998 incident resurfaced.

210. Through therapy and reflection following the more recent assault, Jane Doe came to understand the profound impact of the earlier abuse, as well as its connection to the psychological and emotional struggles she had endured throughout her life.

211. After her memories were triggered by the second assault, the Plaintiff remembered details of the 1998 sexual assault.

212. In June 1998, Plaintiff Jane Doe #1, a fifteen (15) year-old minor, attended All Nations Church, formerly known as Cathedral Baptist Church of the Grand Strand, Inc.

213. Plaintiff spent her summers in Myrtle Beach, South Carolina, residing with her grandparents, who were members of Cathedral.

214. Plaintiff's time in Myrtle Beach was supposed to be a period of safety, love, and warmth.

215. Her grandparents were her support system, and the summers she spent with them were among the happiest times of her childhood.

216. JPM was a nineteen (19) year-old adult male employed at Cathedral as a youth leader and musician at Cathedral in 1998.

217. At the time of the events in question, JPM was known to his father (head pastor), church leadership and members as a troubled individual with a history of reckless behavior, including prior legal troubles, a child born out of wedlock, and a pattern of misconduct.

218. Despite this knowledge, church leadership—including Defendant Reginald Wayne Miller, who was JPM's father and the Head Pastor of All Nations—failed to take reasonable steps to monitor JPM's behavior and continued to allow him unrestricted access to minor children at the church in the sanctuary, his father's office or in the church's programs (including the youth program).

219. RWM had personally engaged in sexual misconduct before 1998.

220. He knew his son was engaging in sexual misconduct.

221. This was the proverbial, fox guarding the henhouse.

222. RWM did not institute any type of safeguard over the dangers posed by JPM or himself.

223. RWM had complete control of the church by virtue of the bylaws which left him in complete control of the church without any oversight by anyone else.

224. Though he was in control, there were other leaders of the church who could have intervened to protect minors at the church.

225. They did not.

226. They ceded complete control to RWM who allowed his son JPM to have free rein over the church and the minors at the church.

227. This church was JPM's sexual playground.

228. Leadership at the church, including RWM, should have undertaken something to protect the minors at the church from JPM and any other predator (including RWM).

229. They did not.

230. On or about July 19, 1998, a Sunday morning, Plaintiff attended Cathedral (formerly All Nations Church) with her grandparents, and her grandmother who proceeded to her Sunday school class held in a separate classroom building –the academy building--on church property.

231. Plaintiff initially intended to attend Sunday school with her grandmother but changed her mind and instead went to the church building where she intended on going to her grandfather's Sunday school class.

232. The classes had begun, and the doors were shut, and Jane Doe #1 wasn't aware which room he was in so instead of interrupting classes she entered the main church sanctuary.

233. JPM was playing the piano and another band member was strumming a guitar.

234. Upon noticing Plaintiff, JPM engaged her in conversation.

235. At some point, Plaintiff stepped away from the sanctuary and walked down the hall to the restroom.

236. When Plaintiff exited the restroom, she encountered JPM standing near his father's office door.

237. JPM called out Plaintiff's name and initiated a seemingly innocent conversation, inquiring about a mutual friend's recent absence from church.

238. Without warning, JPM forced Plaintiff inside his father's office, shutting the door behind him.

239. JPM immediately became aggressive, physically overpowering Plaintiff and forcing her against the wall.

240. Despite Plaintiff's struggles and verbal pleas for him to stop, JPM ignored her and forcibly moved her out of the office, down the hallway, and to a door that led outside to a grassy side yard of the church where JPM's truck was parked.

241. JPM then forced Jane Doe #1 into his truck and that is where he raped her.

242. At the time of the assault, Plaintiff was a virgin.

243. Plaintiff was terrified, physically overpowered, and left defenseless against JPM's assault.

244. JPM, an adult man in a position of authority within the church, took full advantage of Plaintiff's youth, inexperience, and vulnerability to commit this heinous act.

245. Following the sexual assault, Plaintiff remained silent about what had occurred with JPM and was overcome by shock, shame, and fear.

246. In the following months, Plaintiff exhibited clear signs of trauma, including severe depression, social withdrawal from family and friends, declining academic performance and emotional distress and self-doubt.

247. Despite prior concerns about JPM's behavior, church leadership, including Reginald Wayne Miller, failed to take any action to investigate or prevent further abuse.

248. Shortly after being assaulted by JPM in 2023, Plaintiff received a text message informing her that JPM's wife had died.

249. The cause of death was reported as a gunshot wound to the head, under suspicious circumstances.

250. Within hours of her death, JPM delivered a sermon, using manipulative rhetoric to maintain control over his congregation, despite the tragic and questionable circumstances surrounding his wife's passing.

251. This was yet another example of JPM's conniving and manipulative behavior.

252. Plaintiff suffered immense guilt after JPM's wife's death, believing that had she spoken up sooner, she might have prevented further harm to others.

253. This guilt and shame experienced by Jane Doe #1 for not reporting the second assault at the time of occurrence or the first assault after her memories came flooding back, was another insult to the plaintiff's emotional psyche.

254. JPM's history of predatory behavior, his continued acts of harassment and assault, and Defendant's failure to protect children and to prevent JPM's unfettered access to minor children have caused Plaintiff severe and lasting harm.

FOR A FIRST CAUSE OF ACTION
(Negligence, Gross Negligence, and Recklessness)

255. Plaintiff reincorporates and realleges all above paragraphs verbatim.

256. All Defendants had multiple neutral principles of law duties to Plaintiff Jane Doe #1 to prevent her from suffering harm at Cathedral Church.

257. Defendant JPM emotionally manipulated, emotionally abused, inappropriately touched, used harsh language, sexually abused and assaulted Jane Doe #1 and performed his duties as a church leader in a negligent, grossly negligent, and reckless manner.

258. As alleged above, Defendants RWM, JPM, Cathedral and Solid Rock had a neutral principle of law duty to protect Plaintiff Jane Doe #1 from foreseeable harm.

259. As alleged above, Defendants were aware of or should have been aware of JPM spending a lot of alone time with specific minors in the course and scope of his duties at the church.

260. At all relevant times, prior to JPM's interaction with Plaintiff Jane Doe #1, Defendants knew of sexual misconduct incidents involving the church or one of its affiliated programs.

261. These incidents put Defendants Cathedral, Solid Rock, and RWM on notice that they had a duty to implement neutral principles of law policies and procedures to protect minors at Cathedral/Solid Rock.

262. Defendant RWM and other unnamed members of Cathedral and Solid Rock knew of JPM's propensity to spend improper amounts of alone time with minors by himself or engaging in sexual misconduct.

263. This knowledge by RWM and others created a duty to report JPM's illicit conduct to law enforcement or leadership of the Church and warn others of this danger.

264. Instead, RWM chose to enable JPM to treat the church as his hunting area for under-age females.

265. Defendants had a duty to create and promote a neutral principle of law and a culture of safety to prioritize the well-being of children and young adults to protect them from negligent, grossly negligent, reckless, predatory, and abusive employees and/or agents.

266. The duties to Jane Doe #1 by all Defendants included a duty to prohibit or prevent one-on-one interaction with youth leaders and participants with no other adults present.

267. Defendants knew that JPM would be around vulnerable children by virtue of his unfettered access to all areas of the church, including RWM's office.

268. As a result of the actions and inactions of all Defendants, Plaintiff Jane Doe #1 was subjected to negligent, grossly negligent, and reckless conduct by JPM, pervasive and inappropriate actions by JPM, exploitative behavior by JPM, and sexual assault by JPM

269. Defendants breached their duties to Plaintiff Jane Doe #1 in multiple ways.

270. Defendants failures as indicated herein amount to the total absence of care

271. Each act or failure to act described below constitutes a distinct and separate occurrence for purposes of the South Carolina Tort Claims Act.

272. Defendants Cathedral Baptist Church, All Nations Church, Solid Rock Ministries, Reginald Wayne Miller, and John-Paul Miller breached multiple neutral principles of law duties owed to Plaintiff in a negligent, grossly negligent, and reckless manner, committing one or more of the following acts of omission or commission, any or all of which constitute breaches of their legal duties owed to Plaintiff:

a. Failure to Protect Plaintiff from Foreseeable Harm – Defendants failed to ensure that Plaintiff Jane Doe #1 was not exposed to injurious behavior by Defendant John-Paul Miller, constituting a first occurrence of harm that Defendants had the power and duty to prevent.

b. Failure to Implement a System of Protection – Defendants Cathedral, Solid Rock, and Reginald Wayne Miller failed to establish, implement, and enforce a system of safeguards to protect minors from harm, despite the well-known risks associated with unchecked interactions between adult church leaders and minors.

c. Negligent Misrepresentation of Safety – Defendants misrepresented to Plaintiff and her grandparents that she would be safe at Cathedral, Solid Rock, and their associated programs, despite their failure to implement protective measures that would have ensured her well-being.

d. Failure to Warn of Known Dangers – Defendants failed to warn Plaintiff and her grandparents about the known risks posed by Defendant John-Paul Miller, despite prior allegations and a history of misconduct that should have led to his removal from any position of authority over minors.

e. Failure to Train Program Members – Defendants failed to train members of church leadership at Cathedral and Solid Rock on ways to identify, prevent, and report predatory behavior, thereby placing Plaintiff and other minors in avoidable danger.

f. Failure to Supervise John-Paul Miller – Defendants failed to properly supervise Defendant John-Paul Miller despite knowledge of prior misconduct and allegations that should have led to heightened oversight of his activities and interactions with minors.

g. Failure to Monitor John-Paul Miller – Defendants failed to monitor Defendant John-Paul Miller, allowing him to operate without sufficient oversight, which created an opportunity for further exploitation of vulnerable minors, including Plaintiff.

h. Failure to Protect Plaintiff from Sexual Abuse – Defendants failed to protect Plaintiff from the direct harm inflicted by Defendant John-Paul Miller, despite their duty to provide a safe and secure environment for minors participating in church-sponsored programs.

i. Failure to Ensure Plaintiff's Safety at Cathedral – Defendants failed to establish and enforce safety measures while Plaintiff was in the care, custody, or presence of Cathedral Baptist Church, All Nations Church, and Solid Rock Ministries, allowing harm to occur under their authority.

j. Failure to Create, Implement, and Communicate Protective Policies – Defendants failed to create, implement, and communicate appropriate policies and procedures designed to protect minors at Cathedral and Solid Rock, despite the clear and foreseeable risks associated with failing to do so.

k. Failure to Investigate Prior Incidents of Abuse – Defendants failed to investigate prior allegations of sexual abuse, including those concerning John-Paul Miller and Reginald Wayne Miller, and failed to take necessary corrective actions to prevent further victimization of minors in their programs.

l. Failure to Train Church Leaders – Defendants failed to properly train all Church leaders at Solid Rock and Cathedral, despite their duty to equip staff with the knowledge and resources necessary to protect minors from sexual abuse and exploitation.

m. Failure to Investigate John-Paul Miller's Misconduct – Defendants failed to investigate or act when they first became aware that John-Paul Miller was engaging in inappropriate contact or exhibiting inappropriate behavior toward minor children at Cathedral and Solid Rock.

n. Failure to Adhere to Industry Standards – Defendants failed to follow well-established industry standards in child protection, including background checks, training, supervision, and reporting mechanisms, which are recognized across religious institutions as necessary safeguards to prevent child exploitation and abuse.

o. Other Breaches to Be Determined in Discovery – In such other particulars as will be discovered through further investigation, depositions, and evidence collection during discovery, Defendants' failure to uphold their duties will be further revealed, demonstrating their negligence, gross negligence, and reckless disregard for the safety of minors entrusted to their care.

273. As a direct and proximate result of the negligent, grossly negligent, and reckless, actions and inactions of Defendants, the Plaintiff Jane Doe #1 has suffered and will continue to suffer damages and Plaintiff is entitled to judgment against Defendant Cathedral and Solid Rock for all actual damages and against RWM and JPM for actual and compensatory damage, punitive damages, and such other relief in law or equity as may be determined by a jury.

FOR A SECOND CAUSE OF ACTION AS TO ALL DEFENDANTS
(Civil Conspiracy)

274. Plaintiffs reallege and reincorporate all above paragraphs verbatim.

275. Defendants Cathedral Baptist Church, All Nations Church, Solid Rock Ministries, Reginald Wayne Miller, and John-Paul Miller knowingly engaged in a concerted effort to conceal, suppress, and enable the continued sexual misconduct of Defendant John-Paul Miller, thereby conspiring to protect him from accountability while placing minors, including Plaintiff Jane Doe #1, in foreseeable danger.

276. This conspiracy was motivated by the Defendants' financial interests, institutional reputation, and personal loyalty to John-Paul Miller, rather than any legitimate religious or organizational purpose

277. Defendants knew or should have known that JPM was a danger to minors as early as 1997 based on prior incidents of inappropriate behavior and misconduct involving young congregants.

278. They were aware of specific allegations, inappropriate contact with minor females, and past warnings regarding JPM's conduct, yet they deliberately chose to protect him rather than remove him from a position of power or authority within the church.

279. Despite their knowledge of his predatory behavior, Defendants took affirmative steps to hide, suppress, and prevent the reporting of JPM's actions, including:

a. Knowingly allowing JPM to remain in leadership at Cathedral and Solid Rock despite allegations of misconduct with minors.

b. Refusing to report JPM's conduct to law enforcement despite being legally and morally obligated to do so.

c. Suppressing or destroying evidence, complaints, or reports made by victims, their families, or church members.

d. Discouraging or intimidating victims and witnesses from coming forward with allegations of abuse against JPM.

e. Transferring or repositioning JPM within the church instead of removing him or implementing safety measures to protect minors.

f. Providing JPM continued access to minors despite past allegations and known risks.

g. Misrepresenting the safety of Cathedral, All Nations, and Solid Rock to parents and congregants while knowingly harboring a predator.

h. Allowing JPM to engage in unsupervised interactions with minor children, including private meetings, text messaging, and social outings, despite clear signs of grooming behavior.

i. Failing to implement or enforce policies that would have restricted JPM's access to vulnerable minors, despite their affirmative duty to do so.

j. Ensuring that all decisions related to JPM's misconduct remained within a small, controlled group of church leadership, preventing outside intervention or oversight.

280. Defendants actively conspired to hide JPM's pattern of inappropriate behavior with minors from others, knowing that exposure would result in significant fallout for the church, including legal liability, financial consequences, and reputational damage.

281. Furthermore, Defendants profited from JPM's continued leadership, as his status within the church attracted followers and financial contributions that directly benefited the organization and its leadership

282. The access to minor children by JPM, facilitated by the conspiratorial actions of all Defendants, directly resulted in the harm suffered by Plaintiff Jane Doe #1

283. The predicate acts necessary to constitute civil conspiracy include, but are not limited to:

a. Defendants' collective and deliberate efforts to prevent others from discovering JPM's inappropriate actions with minors at Cathedral and Solid Rock.

b. Defendants' failure to report JPM's sexual misconduct and inappropriate conduct to law enforcement, despite a clear duty to do so.

c. Defendants' failure to disclose JPM's actions to appropriate church authorities or external oversight bodies, thereby ensuring that complaints remained within a controlled, internal circle.

d. Defendants' coordination to protect JPM from scrutiny, including by silencing victims, shielding him from investigations, and continuing to allow him access to minor children despite known risks.

e. Defendants' failure to take corrective action after learning of JPM's conduct, thereby allowing other minors to be abused without intervention.

f. Defendants' refusal to take disciplinary measures against JPM or remove him from leadership, despite overwhelming evidence of his predatory behavior.

284. As a direct and proximate result of the civil conspiracy between all Defendants, the Plaintiff Jane Doe #1 has suffered and will continue to suffer damages and is entitled to judgment against Defendant Cathedral and Solid Rock for actual and compensatory damages. Plaintiff Jane Doe #1 is also entitled to judgment against RWM and JPM for actual and punitive damages and such other damages in law or equity as may be determined at a trial of this matter.

FOR A THIRD CAUSE OF ACTION AS TO DEFENDANT JOHN PAUL MILLER
(Assault and Battery)

285. Plaintiffs reincorporate and reallege all above paragraphs herein verbatim.

286. John Paul Miller threatened and intended to harm Plaintiff Jane Doe #1 on multiple occasions in different decades (assault).

287. John Paul Miller inappropriately touched and violated Plaintiff Jane Doe #1 (battery).

288. As a direct and proximate result of Defendant John Paul Miller's actions delineated above, Plaintiff Jane Doe #1 suffered damages.

289. Plaintiff Jane Doe #1 has had to undergo counseling and treatment as a result of John Paul Miller's battery and assault of her and this will likely continue for the rest of her life.

290. As a direct and proximate result of the assault and battery perpetrated on the Plaintiff John Doe #1 by Defendant John Paul Miller, the Plaintiff John Doe #1 has suffered and will continue to suffer damages and is entitled to judgment against Defendant John Paul Miller for actual and compensatory damages, punitive damages, and such other relief in law and equity as may be determined by a jury at the trial of this action.

291. As a direct and proximate result of the John Paul Miller's sexual assault of her, Jane Doe #1 has suffered and will continue to suffer damages and is entitled to judgment against Defendant John Paul Miller for actual and punitive damages and such other damages in law or equity as may be determined at a trial of this matter.

FOR A FOURTH CAUSE OF ACTION AS TO ALL DEFENDANTS
(Outrage/Intentional or Reckless Infliction of Emotional Distress)

292. Plaintiff realleges and reincorporates all above paragraphs herein verbatim.

293. Defendants recklessly or intentionally inflicted severe emotional distress on Plaintiff Jane Doe #1 by virtue of their actions, and it was certain or substantially certain that such distress could result from Defendants' conduct.

294. Defendants recklessly or intentionally inflicted severe emotional distress on Plaintiff Jane Doe #1 by virtue of their actions in promising to protect Jane Doe #1 while knowing that JPM was a child predator and hiding his actions from the public.

295. Defendant John Paul Miller inflicted severe emotional distress on Plaintiff Jane Doe #1 by attempting to intimidate her after she was victimized by his conduct.

296. Defendants' conduct was extreme and outrageous, exceeding all possible bounds of decency and being intolerable in a civilized community.

297. Defendants' actions caused Plaintiff emotional distress.

298. The emotional distress suffered by Plaintiffs was so severe that no reasonable person could be expected to endure it, and this distress manifested itself in physical symptoms.

299. The emotional distress caused by the actions and inactions of all Defendants includes, but is not limited to, medical problems, emotional issues, mental anguish, and behaviors that are capable of objective diagnosis.

300. As a direct and proximate result of the intentional and/or reckless infliction of emotional distress on Plaintiff, she has suffered damages.

301. As a direct and proximate result of the reckless or intentional infliction of emotional distress by all Defendants, the Plaintiff has suffered and will continue to suffer damages, and Plaintiff is entitled to judgment against Defendants Cathedral and Solid Rock for actual and compensatory damages. Plaintiff is also entitled to judgment against RWM and JPM for actual and punitive damages and such other damages in law or equity as may be determined at a trial of this matter.

FOR A FIFTH CAUSE OF ACTION
(Violation of the South Carolina Unfair Trade Practices Act, S.C. Code Ann. § 39-5-10, et seq.)

302. Plaintiff realleges and reincorporates all above paragraphs herein verbatim.

303. Defendants Cathedral and Solid Rock held themselves out (and still do) as organizations that provide a safe, structured, and nurturing environment for children under the age of sixteen (16).

304. Defendants Cathedral and Solid Rock are aware of ongoing and historical failures to protect minors from exploitation within their facilities

305. Plaintiff, relying on Defendants' representations regarding the safety and supervision of children at the church, attended church at Cathedral and Solid Rock placing their minor granddaughter (Jane Doe #1) at risk of unknown danger.

306. Other families at Cathedral and Solid Rock relied on Defendant Cathedral and Solid Rock's representation of child safety at the church when deciding to allow their children to attend the church, roam the church grounds and participate in youth programs.

307. Defendants have engaged in unfair and deceptive trade practices in violation of the South Carolina Unfair Trade Practices Act (SCUTPA) by:

a. Misrepresenting the nature of their services, including falsely advertising their facilities as safe and nurturing environments for minor children when, in fact, they have a documented history of failing to protect minors from harm; and,

b. Engaging in fraudulent and deceptive conduct by creating a false impression that they have effective policies, procedures, and safeguards in place to protect minor children when such measures were either wholly inadequate or negligently enforced.

308. Defendants' unlawful conduct is part of a pattern of deceptive business practices that have occurred in the past, have the capacity to be repeated, and pose a significant risk of harm to the public, including other families and vulnerable children

309. As a direct and proximate result of Defendants' violations of the South Carolina Unfair Trade Practices Act, Jane Doe #1 has suffered substantial damages, including physical, emotional, and psychological harm. Plaintiffs are entitled to treble damages, attorneys' fees, and all other relief deemed just and appropriate by a jury at trial.

Signature Page to Follow

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Rock Hill, South Carolina
February 25, 2025