

STATE OF SOUTH CAROLINA )  
 COUNTY OF HORRY )  
 ALISON WILLIAMS )  
 (FORMERLY MILLER), )  
 Plaintiff, )  
 v. )  
 JOHN P. MILLER, )  
 Defendant. )

IN THE FAMILY COURT OF THE  
 FIFTEENTH JUDICIAL CIRCUIT  
 FILE NO.: 2024-DR-26- 1180

**AFFIDAVIT OF**  
**ALISON WILLIAMS**  
*(In Support of Ex Parte Order and*  
*Expedited Motion)*  
 FILED  
 HORRY COUNTY  
 2024 MAR 28 P 4:51  
 REBECCA E. ELVIS  
 CLERK OF COURT  
 HORRY COUNTY, SC

PERSONALLY APPEARED before me, ALISON WILLIAMS (FORMERLY MILLER), who first being duly sworn, deposes and states:

1. My name is Alison Williams, and I am the Plaintiff in this action. I was formerly married to the Defendant, John Paul Miller ("J.P.") for approximately sixteen (16) years prior to our divorce in 2016.

2. During our marriage, we had four (4) children, two (2) of whom are now emancipated. Our two (2) minor children, A.M. born in 2008, and S.M. born in 2009, are the subject matter of this litigation.

3. Since the filing of our Final Order (Ending Action) on October 30, 2015 (File Number: 2015-DR-26-2210), there has been a substantial change in circumstance that warrants modification of our prior Final Order, as fully set forth in my Verified Complaint (*Modification of Custody, Child Support and Alimony*) filed in this action.

4. I am providing this affidavit in support of my verified Motion for an *ex parte* Order and Expedited Temporary Hearing. I have a voluminous amount of evidence to support the concerns and allegations contained in my verified Complaint and Motion, however, until such time as proper safety measures are in place, I am strictly limiting the amount of information shared in this affidavit and provided to the Court.

5. This affidavit should be read in conjunction with the affidavit I previously filed with the Court in File Number: 2015-DR-26-2210, to allow a full understanding of the facts and circumstances surrounding my marriage and subsequent divorce from the Defendant.

6. In 2015, J.P. was the pastor of Solid Rock Ministries and I was served as his assistant to pastoral duties. We separated after I learned J.P. was having an adulterous affair with our former nanny, Mica Miller (who joined our church at the age of 15) was married to J.P.'s best friend (who was also on our church staff) and serving as our church worship leader, at the time of their affair.

7. J.P. told me that in addition to his affair with Mica, he had employed prostitutes, and been sexually inappropriate with several underage female members of our church. He blamed his immoral sexual behaviors on the sexual abuse he experienced for years, by his father, Wayne Miller. The church requested that J.P. enroll in an extensive sexual addiction program, however despite him promising me that he would, to my knowledge, that never happened.

8. The affair between J.P. and Mica tore our personal and church family apart, and caused an imaginable amount of pain and discord in the lives

of so many innocent people who truly trusted and believed in J.P. At the time the church learned about J.P.'s affair with Mica, the church was operating under the belief the old bylaws of our church had been amended, and that we were operating under new bylaws J.P. represented had been put in place that *inter alia*, required the formation of a board of council members, to approve any major decisions regarding the church, including financial expenditures. When the council voted to have J.P. temporarily step down from the head pastor position, so he could seek treatment for his self-reported sexual addictions, and focus on his restoration, instead of following the direction of our church leaders, J.P. held a meeting and informed the council the new bylaws were invalid, and therefore, pursuant to the old bylaws, he had 100% decision-making authority. That was the first-time members of our church had an opportunity to see J.P. for who he really was, and became gravely concerned about his integrity and the financial structure of the church. As a result, almost our entire congregation left the church, and J.P. began his quest to recruit new members, and operate Solid Rock Ministries solely at his direction.

9. After J.P. informed me that he had been inappropriate with minor female members of our church, and disclosed to me the identity of these girls, I immediately contacted them to encourage them to come forward. Although they each shared with me detailed accounts of what J.P. did to them, they were too scared of J.P. to make a police report or testify in Court. When I learned they were too fearful to report J.P., I went to the police department for the purpose of making a report and requesting an investigation. However, I was in essence told

by police officials that nobody would believe me because J.P. was a well-known pastor and we were in the middle of a divorce. Without the testimony of the victims, there was little else I could do to prove what J.P. had done and ensure he was held accountable.

10. I began to realize the power J.P. seemed to have over leaders and officials in our community, and based upon having limited proof, there was no way for me to ensure J.P. was held accountable and prevented from continuing to victimize innocent people. Given the circumstances, I decided the best way for me to protect our children was to reach an Agreement with J.P. that contained terms I believed would ensure their safety, and encourage him to seek treatment. To that end, J.P. had periodic periods of visitation with our children however, we agreed J.P.'s visitation with our daughter (who is a subject to this action), would be restricted to solely daytime periods of visitation. **(See Attached Exhibit A - Final Order)**

11. Following my divorce from J.P., he married his then paramour, Mica Miller. Prior to my knowledge of J.P.'s sexual relationship with Mica during our marriage, both she and her husband at the time Jeremy, became very close to our family. Mica did not have a close relationship with her mother, and to some degree, I took her under my wing, as an older daughter. I taught her to drive, took her to get her driver's license, allowed her to care for our children, shared family meal times together in our home, provided her guidance and advice and she began working in the church.

12. Despite the initial destruction caused by J.P.'s infidelity, for several years, there was a part of me that was relieved to know Mica would be present in the home when J.P. had periods of visitation with our children, and I viewed her as a safety net for my children. Although, our children continued to struggle with the anger and disappointment they felt toward their father, often refusing to share visitation periods with him, for a couple of years, things appeared to be not quite as tumultuous.

13. In 2021-22, things gradually began to change to the detriment of our children, and have escalated to the severity of where things are today. J.P. and Mica began having severe marital difficulties, and our children were placed directly in the middle of this discord. J.P. would preach sermons on the Sundays our children were with him and present in the congregation, disparaging Mica and indicating she had mental health issues, and eventually putting her in a mental hospital. The children were subjected to J.P. calling Mica crazy one day, and then her being back in the home at their next visit with their father assuring them she was fine. They never knew what to expect, and the intense unpredictability and marital discord between J.P. and Mica negatively impacted them all. On one occasion, while picking up our daughter, I observed holes in their walls, hinges off the doors, and pieces of paper taped to the wall with negative affirmations about Mica. J.P. told me and our children that Mica was delusional, and speaking different languages, and seeing things that were not there. J.P. agreed it was not safe for our children to be in his home, and for

periods at my request, did not insist that they stay with him overnight. He would pick them up from school and bring them home after taking them to dinner.

14. J.P. began spending time with his now paramour Suzie, who was the mother of one of the boys that plays on our son's soccer team. J.P. began using our son to facilitate times he could spend with Suzie, which our children were well-aware of. Their friends talked about it, and it caused them a tremendous amount of embarrassment. When I learned J.P. was exposing our children to yet another one of his adulterous affairs, I confronted J.P. and Suzie and told them not to let it happen again. J.P. called me the day Suzie's husband died in an alleged drowning accident extremely upset and asking me to pray, which was incredibly bizarre. Based upon information and belief, just two (2) weeks prior to this incident, Suzie's husband had confronted J.P. and asked him to leave his wife and children alone. It is chilling to know that the spouses of both Suzie and J.P. are now dead, from tragic events.

15. It was around this time, J.P.'s mental health seemed to be really spiraling out of control, and he began acting even more bizarre. He informed me that he was getting into buying guns and shooting, and had purchased a gun safe for his home. As a convicted felon, he is not allowed to have weapons however, he managed to get a police chief from the church to assist with expunging his record. Further, he was given a special police badge that says "pastor" to utilize if he ever gets pulled over, so they will let him go. With the constant discord between J.P. and Mica, and J.P.'s own self-reported mental

health struggles, the thought of J.P. having access to guns in his home, terrified me for the safety of our children.

16. It was about this time J.P. began declining to pick up our children for visitation, informing me that his mental health was not "well-enough" for him to share time with them. Of course, given the circumstances, I would have refused to let them go, however, having it be J.P.'s idea, made it far easier and safer, and prevented the necessity of filing a legal action with the Court.

17. One evening J.P. informed me that Mica had a break-down and was on her way to my house, and requested me to hold her when she arrived because he had the police coming. It was my understanding that Mica was trying to get away from J.P. because he was trying to have her committed again. Our children were at home and once again, subjected to this severe discord.

18. Mica began calling me for advice on how to free herself from J.P. and for guidance as to counselors and people to assist her. I prayed with Mica and did all I could to provide her with sound advice and guidance. Mica shared information with me about the things my children were exposed to while in the care of J.P. and warned me that my children were in danger while in his care. I have several recordings and text messages that verify this information, and it causes me tremendous concern about the safety and welfare of our children while in the care of J.P., especially now that Mica is no longer present.

19. I was married to J.P. for 16 years. Although my story and what I lived through with J.P. is different in some ways, many of the details shared with me by Mica, are so similar to my own experiences with J.P., that I know she was

being truthful. Based upon information and belief, J.P.'s mental health and deviant sexual addictions have only worsened since the time we were married, and I do not believe our children are safe in his care.

20. Since Mica's death, I have requested that J.P. not see our children. Initially, I was okay with phone calls and text messages however, when recently texting with them, J.P. has inappropriately discussed the current state of events with them, *inter alia*, sharing his plans of "*suing everyone, and being a millionaire.*" Our children do not need to be subjected to any discussion about the current situation, as I am doing all I can to prevent them from being exposed to the massive social media and national coverage. For their privacy and protection, I have refrained from making any public statements or comments. Our children are highly upset, and do not wish to have contact with their father which at this time, I strongly believe is in their best interest. My goal is not to keep our children from their father permanently, but until such time as he can undergo adequate psychological testing, following all recommendations, to ensure his mental stability and assure contact with their father, is in their best interest.

21. Currently, J.P. is being threatened and followed on social media by people from around the world. Placing our children in that situation, and subjecting them to social media coverage or involvement is simply not in their best interest.



22. Based upon information and belief, J.P. is not emotionally stable enough to share periods of visitation with our children, and them being in his care, would place them in imminent danger; emotionally, psychologically, and physically. J.P. has readily confessed to having suicidal ideations, and mental health issues that call his stability to care for our children directly into question.

23. Based upon the foregoing, I am requesting the Court issue an *Ex Parte* and Temporary Order granting me sole custody of our children. I am further requesting this matter be scheduled to be heard on an expedited basis, and that all contact between J.P. and our minor children be suspended, pending J.P. undergoing a full psychological and parental fitness examination, and following all recommendations resulting therefrom. I further request a Guardian *ad Litem* be appointed to conduct an expedited investigation, as to the best interest of our children.

24. I am further requesting the remaining relief and restraining Orders set-forth in my filed pleadings, for an award of attorney fees and costs, and for other relief the Court may deem just and proper.

25. I have attached a list of exhibits in support of my Motion and request the Court consider same in consideration of the relief set forth in my pleadings.

Alison Williams  
ALISON WILLIAMS

**SWORN TO** and **SUBSCRIBED**  
This the 23 day of May, 2024.

Dawn M. Breedon  
Notary Public Printed Name

Dawn M. Breedon  
Notary Public Official Signature

Notary Public For: South Carolina

My Commission Expires: 9/7/32

