

IN THE CHANCERY COURT OF JACKSON COUNTY, MISSISSIPPI

QJR, LLC

FILED

PLAINTIFF

VERSUS

JUL 09 2025 CAUSE NO. 24-1884-DNH

SECURIX, LLC and
JONATHAN MILLER, individually and as
Chairman of SECURIX, LLC

JOSH ELDRIDGE, CLERK

By _____

DEFENDANTS

NOTICE OF ONGOING NONCOMPLIANCE WITH
JUDGMENT OF CONTEMPT AND FEE ORDER

COMES NOW QJR, LLC, by and through its undersigned counsel, and files this Notice of Noncompliance with the Court's March 20, 2025 Judgment of Contempt, and would respectfully show unto the Court as follows:

1. On March 20, 2025, this Court entered a Judgment of Contempt against Defendant Jonathan Miller, finding that Mr. Miller willfully violated the Court's prior orders. As stated in the Judgment, Mr. Miller admitted at the March 19, 2025 hearing that he had engaged in such conduct. A copy of the Court's Judgment is attached hereto as Exhibit A.

2. In its written order, the Court determined that Mr. Miller's conduct warranted incarceration. However, the Court suspended the incarceration order, providing Mr. Miller with an opportunity to purge himself of contempt by complying with three express conditions: (a) payment of attorneys' fees and costs related to the improvident removal of this matter to federal court; (b) payment of fees and costs incurred in bringing the contempt motion; and (c) submission of an apology letter to opposing counsel and members of QJR, LLC.

3. On May 15, 2025, the Court entered a Judgment Awarding Attorneys' Fees and Setting Purge Amount, directing Mr. Miller to pay \$63,603.80 to QJR, LLC within twenty-four hours of entry. A copy of the Court's Judgment is attached hereto as Exhibit B.

4. QJR, LLC, through undersigned counsel, issued a written demand to Mr. Miller's counsel on June 2, 2025, reminding him of this obligation and requesting prompt compliance by June 11, 2025. A copy of this demand is attached hereto as Exhibit C.

5. As of the date of this filing, Mr. Miller has failed to comply with that Judgment. He has made no payment to satisfy the fee award. Mr. Miller has also failed to submit the apology letters required under the purge provisions of the Court's March 20 Judgment.

6. In addition, Mr. Miller has failed to report to the Adult Detention Center as ordered by this Court. His ongoing and willful refusal to purge himself of contempt threatens the integrity of this Court's proceedings and its ability to enforce its own orders.

7. Mr. Miller's contempt has not been limited to inaction. On July 1, 2025, Plaintiff received a forwarded copy of a letter sent by Mr. Miller to the Chief of Police for the City of Senatobia, Mississippi, which falsely purports to describe court proceedings and rulings, misrepresents sealed matters, and disparages Plaintiff and its members. A copy of that letter is attached hereto as Exhibit D. This letter—sent directly to a third-party municipal official—was plainly designed to undermine the Court's sealing orders, to retaliate against QJR, and to further damage Plaintiff's business relationships. It evidences not just noncompliance but active defiance, carried out with the intent to frustrate the administration of justice and to impair the effectiveness of the Court's contempt orders.

8. Plaintiffs submit this Notice to place Mr. Miller's *ongoing noncompliance and active defiance* on the record and preserve the issue for further enforcement. Plaintiffs respectfully request that this matter be addressed at the July 24, 2025 hearing, including consideration of appropriate remedies for continued failure to purge contempt, up to and including revocation of the suspended incarceration order and issuance of a bench warrant.

9. Plaintiffs further request that Mr. Miller be ordered to appear in person at the July 24, 2025 hearing and be made available for examination on the matters set for hearing.

WHEREFORE, PREMISES CONSIDERED, Plaintiff respectfully requests that the Court:

1. Acknowledge Defendant Jonathan Miller's failure to comply with the purge conditions set forth in the March 20, 2025 Judgment of Contempt;

2. Take judicial notice that Mr. Miller has failed to pay the \$63,603.80 in attorneys' fees and costs awarded by the Court's May 15, 2025 Order, and has failed to submit the apology letters required under that Judgment;

3. Consider appropriate remedies for noncompliance at the July 24, 2025 hearing.

4. Grant such other and further relief as the Court deems just and proper.

5. Consider whether Mr. Miller's July 1 letter, attached hereto, constitutes an independent basis for further sanctions, and take any action deemed necessary to protect the integrity of these proceedings.

DATED this the ^{6th}~~2nd~~ day of July, 2025.

Respectfully submitted,

By: s/Jaklyn Wrigley
Jaklyn Wrigley (MSB# 103773)
Nichols Wrigley, PLLC
1011 Iberville Drive
Ocean Springs, Mississippi 32964
Telephone: 228-206-2990
Facsimile: 601-476-4951
jaklyn@nicholswrigley.com

Attorney for the Plaintiff

CERTIFICATE OF SERVICE

I, JAKLYN WRIGLEY, do hereby certify that I have filed the foregoing NOTICE OF HEARING with the Clerk of Court utilizing the ECF-System for sealed cases, and provided a copy of the same to the following:

Albert R. Jordan IV
ALBERT R. JORDAN, IV
MS Bar Roll #102513
Healy & Jordan, PLLC
1232 28th Avenue, Suite A
Gulfport, MS 39501
Telephone: 228-575-4005
Facsimile: 228-575-4006
Email: AJ@HealyJordanLaw.com

DATED, this ^{9th}~~2nd~~ day of July, 2025.

s/Jaklyn Wrigley
JAKLYN WRIGLEY

MAR 20 2025

IN THE CHANCERY COURT OF JACKSON COUNTY, MISSISSIPPI
SUSAN W. HEDRIDGE, CLERK

QJR, LLC

*Filed Harris 4:10 p.m.
D. Neil Harris
Chancellor
March 20, 2025*

By *Carol Whitfield*
PLAINTIFF

V.

CAUSE NO. 2024-1884-DNH

SECURIX, LLC and JONATHAN MILLER, individually and
As Chairman of SECURIX, LLC

DEFENDANTS

JUDGMENT OF CONTEMPT

I.

The Plaintiffs filed a motion for contempt on March 6, 2025 and served Mr. Miller with a Rule 81 summons for March 19, 2025. In summary, this Motion states Mr. Miller violated this Court's injunction [MEC 12] regarding disseminating information about the Parties and litigation involved in this matter contrary to the file being sealed.

II.

At the hearing March 19, 2025, Mr. Miller admitted he had contact with the City of Ocean Springs, others, and contact with a news outlet. Mr. Miller's excuse was Mr. Wilkinson talked to the press. This excuse does not relieve him of his obligation to follow this Court's Orders. There was no independent proof Mr. Wilkinson did so.

III.

Although this Court in a bench ruling found Mr. Miller in contempt because of his willful and contemptuous behavior towards this Court's Order, the Court gave Mr. Miller a significant fine. After considered judgment and the Court speaking only through its written orders (*Wilson v. Town of Hansboro*, 54 So. 845 (Miss. 1911)), the Court does find, order, and decree as follows:

- A. The Court directs Mr. Miller to be incarcerated, however, Mr. Miller may purge himself of contempt, and the Court will suspend the Order of incarceration, provided Mr. Miller takes the following actions: pay of the fees and costs due to the improvident removal of this matter to federal court; pay the fees and costs of bringing this matter of contempt before the Court; and write a letter of apology to Mr. Wilkerson, Ms. Wrigley, and the members of QJR, LLC, which shall be considered sealed documents and not to be disseminated without an order from this Court.
- B. Counsel for the Plaintiff are to file their motion for fees and costs. The Court will hear this matter on April 7, 2025 at 9:00 a.m.
- C. The law requires this Court to enforce its orders and judgments.

So ORDERED, ADJUDGED, and DECREED on this the 20 of March 2025.

D. Neil Harris
CHANCELLOR D. NEIL HARRIS

EXHIBIT

IN THE CHANCERY COURT OF JACKSON COUNTY, MISSISSIPPI

FILED

QJR, LLC

PLAINTIFF

MAY 15 2025

VERSUS

JOSH ELDRIDGE, CLERK
By Sherrill Diddell

CAUSE NO. 2024-1884-DNH

SECURIX, LLC, ET AL

DEFENDANTS

JUDGMENT AWARDING ATTORNEY FEES
AND SETTING PURGE AMOUNT

In the above styled and numbered cause, the Court does hereby FIND, ORDER,
ADJUDGE, and DECREE as follows:

1. Upon the improvident removal of this case from Chancery Court to Federal Court, and its remand, the burden of the expenses, fees, and costs of the improvident removal along with the expenses, fees, and costs of bringing an action for contempt against Defendants fell on the Plaintiff due to the contemptuous actions of the Defendants.
2. Counsel for the Plaintiff, Honorable Jaklyn Wrigley, is entitled to an award of attorneys' fee in the amount of \$63,603.80 to be paid by Jonathan Miller to Jaklyn Wrigley within twenty-four (24) hours of this Judgment.
3. The Court reincorporates its March 20, 2025 Judgment [MEC 51] herein as if set forth fully in words and figures.
4. The purge amount to be paid by Jonathan Miller to stay execution of this Court's sentence of incarceration based on Mr. Miller's willful contempt is \$63,603.80.

SO ORDERED, this the 15 day of May, 2025.

D Neil Harris
CHANCELLOR D. NEIL HARRIS, SR.

EXHIBIT
C



929 Washington Avenue
Ocean Springs, MS 39564
228.206.2990
601.476.4951

Erich Nichols | Partner

✉ Erich@NicholsWrigley.com

Jaklyn Wrigley | Partner

✉ Jaklyn@NicholsWrigley.com

June 2, 2025

Albert R. Jordan, IV
Healy & Jordan, PLLC
1323 28th Ave, Suite A
Gulfport, MS 39501
al@healyjordanlaw.com

Re: Outstanding Judgment – QJR, LLC v. Securix, LLC, et al.

Dear Mr. Jordan:

I write to address the outstanding Court-ordered judgment entered against your client, Mr. Jonathan Miller. As you are aware, on May 15, 2025, the Court entered its Judgment Awarding Attorney Fees and Setting Purge Amount, requiring Mr. Miller to pay \$63,603.80 to my client's counsel within twenty-four hours of entry. Your previously filed Rule 59 Motion was denied by the Court on that same date, and there is no stay or pending motion affecting the finality or enforceability of this judgment.

To date, no payment has been received. On behalf of QJR, LLC, I am requesting that this balance be paid promptly in compliance with the Court's judgment.

Please ensure payment is received no later than June 11, 2025. If payment is not received by this deadline, QJR, LLC will proceed without further notice to enforce the judgment through all available legal remedies, including but not limited to execution, garnishment, and enrollment of the judgment as appropriate.

If you have any questions or believe there is any issue to be addressed in facilitating payment, you are welcome to contact me directly.

We trust this matter can be resolved promptly in accordance with the Court's clear rulings.

Sincerely,

A handwritten signature in blue ink that reads 'Jaklyn Wrigley'.
Jaklyn Wrigley | Partner
Nichols Wrigley, PLLC

cc: QJR, LLC

EXHIBIT

D

SECURIX
AND THE SECURIX GROUP OF COMPANIES

3379 Peachtree Road, Suite 555
Atlanta, GA 30326
800.853.7267

TO: Chief Richard Chandler, City of Senatobia

June 30, 2024

FROM: Jonathan Miller, Chair

RE: Schedule for Removal of Equipment

Chief Chandler, this is to introduce Tyler Perry, our CTO. Tyler is calling you tomorrow, (7/1), to arrange for collection of the Securix System components in Senatobia. As you will remember, those were left in place as a courtesy to both you and Securix Mississippi. I remain Co-Manager along with Josh Gregory of that company but again, all of those elements were provided by Securix, not Securix Mississippi, LLC. Count on Tyler to organize everything for you and make this simple and easy.

As you know, after many requests that it stop, those operating the system, (QJR – Quinton Dickerson, Josh Gregory and Robert Wilkinson), continued to misuse DPS data by non-law enforcement staff to target. When we took irrefutable proof to DPS, it suspended operations last August. Upon suspension we also found massive DPPA violations by QJR. Over 20,000 incidents were recorded of both State and Federal violations. We recorded that matter with DPS but also Federal Authorities prior to any claims being filed and later with the Attorney General's Office. The system is intended to be entirely respectful and ensure privacy but, it was being circumvented. With maximum fines of \$5,000. per occurrence, the potential Federal fines alone to QJR could be over \$100 million and you should also be aware that due to QJR's actions, all insurance was cancelled last August. *There is no coverage.*

We will not tolerate those operating the system to target anyone. We remain dedicated to protecting all agencies involved and protecting the public. We have provided a statement to your attorney but also welcome your questions and concerns at any time. While there has been no defamation on our part since everything herein and in other documents can be proven, be aware there is a sealed order status which of course the reporting of serious crimes, (and these are all certainly that), overrides. You have every right to know the facts and we have a legal and ethical responsibility to inform you. We will not be silenced by fake claims; you deserve to know the facts.

If you wish to use the system to identify violators, (stolen cars, outstanding warrants, etc.), then please advise as we can help you get that sorted and make it very cost effective. If not then you will find Tyler to be both efficient and pleasant in handling the removal and it will happen quickly and without trauma or effort on your part.

I've taken the liberty of adding below a short video for how the system should work. It makes clear that the method used, (and which saw a massive, intentional "choking" of results) and also done by non-law enforcement personnel, was not only unethical but also highly illegal. Determined to protect all agencies, we must inform you.

<https://www.dropbox.com/s/x7bc1bjl0j89kmv/Chief%20Paul%20Cell%20PSA%202.mp4?dl=0>

Kind Regards,



Dr. Jonathan Miller, Chair

cc. ATL/RR/LEGAL/CR/MM

ASA87748.6.25