

1 Q. Sir, are these Instagram messages that you sent to  
2 Josiah Douglas?

3 MR. CONGENI: Can we just ask  
4 for a few minutes for him to review these? It  
5 appears to be six, seven pages of material if  
6 that's okay.

7 THE COURT: Yes, Mr. George,  
8 you can have some time to look at them.

9 THE WITNESS: I don't need time,  
10 your Honor. These are Instagram messages that I  
11 responded to Josiah Douglas. He reached out to  
12 me initially. He would consistently harass me  
13 on Instagram.

14 Q. Okay. But this message on the first page on July  
15 10th, this is from you, correct?

16 A. This is in response to him, yes.

17 Q. Okay. July 10, 2020, correct? Last year?

18 A. Correct. I mean, I don't know the dates. I don't  
19 know if anything was changed on here. I don't have my phone  
20 in front of me. But, yes, it looks like --

21 Q. Okay. You say in this first message, How is your  
22 protective order against you going? Very interesting. We  
23 will be passing out information on your abusive behavior  
24 along with your court order on Sunday at your protest.

25 Is that true?

1 A. Did I -- is it true that I said that?

2 Q. Yes.

3 A. Yes, it's true.

4 Q. Okay. And you say, I am looking forward to  
5 showing the world who you are. Correct?

6 A. Correct.

7 Q. What did you mean by that?

8 A. I'm looking forward to making sure the world is  
9 protected against him because of all the people he has  
10 abused and hurt in the past.

11 Q. Okay. Can you turn to the third page. You write  
12 to him, You are a bad guy about to be exposed. Correct?

13 A. In response to him, yes. I said, like you did,  
14 you are bad guy, about to be exposed.

15 Q. You then said, This is just the start, brother.  
16 Correct?

17 A. I don't remember most -- a lot of this. Like I  
18 said, I don't have my phone in front of me.

19 Q. Did you write that or not, Bobby?

20 A. It looks like I did, yes, but I don't have my  
21 phone in front of me.

22 Q. What did you mean by that?

23 A. Meaning I'm stopping until this guy gets what he  
24 deserves.

25 Q. What does he deserve?

1           A.    I think he deserves to go to jail.

2           Q.    You then say at the bottom of this page, I feel  
3 bad --

4           A.    I don't believe in beating up on women, and he's  
5 beat up on several women in his life.

6           Q.    Okay.

7           A.    And it's documented.  These are facts.  If you  
8 just pull his background, he's got a history of violence --

9                           THE COURT:                    Okay, if you could  
10                           just answer the question --

11          Q.    You then go on to say, I feel bad and would  
12 normally turn the other cheek, but you are just a bad guy  
13 and I need to do the right thing.  Correct?

14          A.    Exactly what I said.

15          Q.    What does that mean?

16          A.    So normally I forgive and I just let things go.  
17 But when I feel that I need to protect others from this  
18 person, I have to follow through.  I have a duty to society  
19 to do the right thing with this guy.  Because he's  
20 dangerous, and God forbid he did something to my cousin,  
21 Jacqueline, or somebody, I wouldn't be able to live with  
22 myself because I didn't speak out against him.  Even though  
23 I knew it would hurt my business to drag this on.  Because  
24 this attention to my business was no good for my business.  
25 So at first I was going to let it go, let the media cycle

1 die. But when I realized what a dangerous punk this guy  
2 was, I said, this isn't going to happen. I'm not going to  
3 let this guy bully anyone anymore.

4 Q. You then go on to say --

5 A. He's a coward. Won't even look at me.

6 Q. You then go on to say, You aren't so tough, are  
7 you? Correct?

8 A. No, he isn't so tough when it comes to men.

9 Q. But you did say that, correct?

10 A. I did.

11 Q. Okay. You then say, I tried to handle things  
12 nicely. Sorry for doing this bud.

13 Did you write that?

14 Sorry for doing this bud. We could have  
15 handled things more productively. Correct?

16 A. Yes.

17 Q. You did?

18 A. I did.

19 Q. And what did you mean, sorry for doing this?  
20 Sorry for doing what?

21 A. Sorry for exposing him to the public because I  
22 didn't want to do that. I believe in second chances. I  
23 just believe in them and I just didn't want to expose this  
24 guy because I knew it would hurt his reputation and  
25 people -- it wouldn't be good for his future.

1 Q. How would you have been able to handle things more  
2 productively? What did you mean by that?

3 A. Just sit down and have a conversation. He was  
4 accusing us of a lot of things, and I offered to sit with  
5 him and talk with him. He wouldn't do it.

6 Q. Well, you then go on to say at the bottom of this  
7 next page, Everything is everyone else's fault. You are not  
8 a man. Putting your hands on women. Try that shit in front  
9 of me. We can see how tough you are. Correct?

10 A. Correct.

11 Q. What did you mean by that?

12 A. I mean if he puts his hands on a woman in front of  
13 me, I'm going to smack the shit out of him.

14 Q. Okay. If we go down to July 11 at 8:13 p.m. you  
15 say, Come meet me tonight. I can't be here tomorrow.

16 Did you write that, sir?

17 A. I did.

18 Q. Okay. You wanted Josiah to come and meet you?

19 A. I did.

20 Q. Why?

21 A. I wanted to sit down and talk to him, because I  
22 wanted to prevent another protest because I was going to --  
23 I believe, I don't have the dates, I was going to be out of  
24 town, and I was very scared for Jacqueline. I was going to  
25 try to handle it before I went out of town.

1 Q. How were you going to handle it?

2 A. Just a sit-down, conversation.

3 Q. You were going to talk to him?

4 A. Yes. That's how things should be handled, Pete.

5 Q. So he's dangerous enough that you think he belongs  
6 in jail and that he's a threat to you and your cousin's  
7 safety, but yet you're inviting him to come meet with you in  
8 person?

9 A. I'm inviting him to come meet me in a public  
10 place, at my business, in person. Like I said, personally  
11 one on one, I'm not scared of Josiah. I'm scared of what  
12 he'll do when -- behind the scenes or to women.

13 Q. Neither of these respondents has ever come around  
14 you in any kind of private setting, correct?

15 A. Actually they have.

16 Q. When did that happen, sir?

17 A. So since this CPO, Josiah has been seen in front  
18 of my businesses, especially at REBoL on Public Square. And  
19 I get calls and by the time I went there to show up he'd be  
20 gone. And in front of TownHall also. My employees all know  
21 what he looks like. He's hard to forget after everything he  
22 did.

23 Q. Okay. Have they come to your house?

24 A. Couple of my businesses have been attacked. We  
25 don't know who.

1 Q. Uh-huh, okay.

2 A. Uh-huh, okay, I'm serious, it's a public  
3 statement. We got a statement from a fire detective that  
4 one of my businesses was attempted -- two of my buildings  
5 were attempted to be burned down. That's a public  
6 statement.

7 MR. PATTAKOS: Here's Exhibit J.

8 THE COURT: This would be  
9 Exhibit K.

10 MR. PATTAKOS: Thank you.

11 A. This is a very, very serious matter.

12 Q. Sir, earlier in this hearing a man named Chris  
13 Piazza testified, who is also a member of the With Peace We  
14 Protest group. Are you familiar with Chris?

15 A. I am.

16 Q. Can you identify these as Instagram messages that  
17 you sent, that you exchanged with Chris?

18 A. I can identify them as Instagram messages that I  
19 respond to Chris.

20 Q. So Chris contacted you first?

21 A. In all situations I was contacted first and  
22 usually baited and harassed before I ever responded.

23 Q. Okay. I want you to look at page 5. It looks  
24 like these are text messages on July 11, the day before the  
25 July 12th protest?

1 A. I'm here.

2 THE COURT: So page 5, top  
3 starts, The stories I hear; is that correct?

4 MR. PATTAKOS: Yes, thank you.

5 Q. Your first text on this page says, You and I can  
6 meet whenever you want. In meantime I can tell you your  
7 friend has a rough time coming up for him. Be careful by  
8 association.

9 Am I reading that correctly, sir?

10 A. You are.

11 Q. Did you say that to Chris?

12 A. It appears so.

13 Q. And you were referring to Josiah here, correct?

14 A. I was.

15 Q. What did you mean by that, that he has a rough  
16 time coming up for him?

17 A. Exactly what you're seeing here. I'm going to  
18 expose him to the public for who he really is.

19 Q. So you knew at this point that you were going  
20 to -- your cousin was going to file these civil protection  
21 order proceedings?

22 A. I don't know. I knew that I was going to publicly  
23 expose him and let people know. I don't believe I knew  
24 about the civil protective order. I think -- not I think.  
25 What I was going to do is pass out a sheet of his criminal



1 record at the next protest and his history, because that's  
2 what he was doing -- he would come to our protest and pass  
3 out sheets of accusations made against my business.

4 And what happened is when others found out,  
5 including others from his organization, who he really was,  
6 they no longer wanted to be a part of the organization.

7 Q. About three days after you sent these messages,  
8 these proceedings were filed, correct, July 14th?

9 A. Pete, honestly I don't know the dates perfectly.  
10 I apologize for that.

11 A. The record reflects that that's the case.

12 Q. A few pages later you say, I would meet with just  
13 you and him. So I think that's three pages later towards  
14 the bottom. You're telling Chris Piazza that you would meet  
15 with just Chris and Josiah, correct?

16 A. Correct.

17 Q. Again you say, Let me know. I can meet all night.  
18 I am here at TownHall. Correct?

19 A. Yes, I was very accommodating. I left my schedule  
20 open all night.

21 Q. This is the night before the July 12th protest?

22 A. If you say so.

23 Q. Okay. You then say on the next page, Just us over  
24 a beer at TownHall. Correct?

25 A. I mean, you're taking it out of context, but yes,

1 it's in response to a conversation. He's asking me who will  
2 be there.

3 DEPUTY: Sorry.

4 THE COURT: You can continue.

5 Q. So you invited them to come have a beer at  
6 TownHall, correct?

7 A. I do.

8 Q. You then say, I will be alone. Two on one is more  
9 than enough. You boys will be okay.

10 What does that mean?

11 A. It means you boys will be okay. He was trying to  
12 bring other people with him and I'm just like, look, I'm  
13 going to be alone. You two can come. Why do you need five  
14 people to meet with one person?

15 Q. If we turn the page -- if you turn the page it  
16 says -- Chris says to you, Your new TownHall post is morally  
17 repulsive.

18 This is July 15, correct?

19 A. Yes.

20 Q. And you say, Not as repulsive as Josiah's record  
21 and the fact that he and some others will have charges  
22 against them for the assault of one of my female employees.

23 Am I reading that correctly?

24 A. I believe so.

25 THE COURT: Counsel, where are

1           you at?

2                   MR. PATTAKOS:           Your Honor, it is  
3           the third to last page of this exhibit.

4                   THE COURT:            Okay. I note for  
5           the pages there's 11 pages, so you're saying  
6           page 9?

7                   MR. PATTAKOS:           I think that's  
8           right. Yes, at the bottom.

9                   THE COURT:            Not as repulsive.

10                   MR. PATTAKOS:           Yes.

11                   THE COURT:            Okay. Thank you.

12                   So for the record this is Exhibit K, page 9.

13 BY MR. PATTAKOS:

14           Q.    So what did you mean by charges against them for  
15           the assault of one of my female employees?

16           A.    Well, at this point -- well, I said, others will  
17           have charges against them. At this point other people from  
18           his organization were reaching out to me, a few of them  
19           which were saying they were going to press charges against  
20           him for assault at another event not having to do with my  
21           event. Also, other employees of mine were wanting to press  
22           charges against him also because he had said very nasty  
23           stuff to my employees, followed them to their cars, yelled  
24           in their face, things like that. He was very, very  
25           disruptive at the protest. It wasn't just towards

1 Jacqueline. Jacqueline is where he really crossed the line.

2 Q. So you weren't talking about your cousin in this  
3 case, or were you?

4 A. I don't believe so. Not yet.

5 Q. Even though she'd already filed these protection  
6 order proceedings?

7 A. Well, it says will have other charges. If she  
8 already filed them, then I probably wasn't talking about  
9 her. She may have been included, but there's several,  
10 several employees.

11 Q. Okay. And yet you're not aware --

12 A. Just like he has several, several past incidents.

13 Q. Let's talk a little bit about that. Are you aware  
14 that Josiah Douglas has ever been convicted of any violent  
15 crime?

16 A. Sometimes I interchange legal words. He's  
17 definitely been -- had a CPO, civil protective order,  
18 against him for a violent crime.

19 Q. Sir, are you aware that Josiah Douglas has ever  
20 been convicted --

21 A. Like I said, I don't know the difference between  
22 convicted -- he's had a civil protective order. You have  
23 it -- I handed it to my --

24 Q. That's fine. Sir, I'm asking you a very specific  
25 question.

1           A.    Yes, the answer is yes, if I'm using the proper  
2 term.

3           Q.    Was he ever found liable for a violent criminal  
4 act by a court anywhere?

5                    THE WITNESS:            Your Honor, is  
6                    that --

7           Q.    Are you aware?

8           A.    I don't know what that means.  Is a civil  
9 protective order liable --

10                   MR. CONGENI:            For the record.

11                   THE COURT:             We can't all speak  
12 at one time.

13                   MR. CONGENI:            I'd just object.  
14 He's calling for a legal conclusion.  He said he  
15 doesn't understand a criminal conviction versus  
16 I guess a civil protective order.

17                   THE COURT:             Sustained.  If you  
18 could be a little more specific.

19                   MR. PATTAKOS:            Sure.  He's up  
20 here saying that my client belongs in jail.  He  
21 stood up here and called my client on an opening  
22 argument called him an unhinged criminal, a  
23 menace to society.

24                   THE WITNESS:            I didn't use those  
25 words.

1                   MR. PATTAKOS:           No, your lawyer  
2                   did, or something along those lines. He  
3                   certainly called him unhinged. So I'm asking  
4                   what the evidence is for this.

5 BY MR. PATTAKOS:

6           Q.    Do you --

7           A.    There's a lot of evidence.

8           Q.    Mr. George, you understand that for someone to  
9           be --

10          A.    If you let me get my paperwork, I have a lot of  
11          evidence. He's got a huge criminal background. He's been  
12          accused of this kind of stuff so many times. The difference  
13          is he finally got to the wrong person that's not going to be  
14          bullied and has the resources to fight back. Everyone else  
15          he has intimidated and bullied to the point where they don't  
16          want anything to do with him.

17          Q.    You understand that to be a criminal you have to  
18          be convicted?

19          A.    He does have a criminal history.

20          Q.    Do you understand, sir --

21          A.    Hold on. He does have a criminal history. He's  
22          been convicted of crimes.

23          Q.    Has he ever been -- to your knowledge, I'm asking,  
24          I don't care what you don't know --

25          A.    Yes, he has been convicted of crimes.

1 Q. Has he ever been convicted of a violent crime?

2 A. A civil protective order is a violent -- that was  
3 enforced because he was violent, so yes.

4 Q. Okay. Apart from your opinions on the civil  
5 protection order, other than this single civil protection  
6 proceeding that you seem to be aware of, are you aware of  
7 anything else, any other violent crime that Mr. Douglas has  
8 been convicted of?

9 A. Yes, but I don't have my paperwork in front of me.

10 Q. What is that crime?

11 A. I did a full background check on him because I  
12 wanted to know how dangerous this guy was after a police  
13 officer said, Bobby, you need to figure out who you're  
14 messing with, okay, and you cannot let your cousin be alone.  
15 So at that point I pulled background checks. It was -- he  
16 was showing up at all my businesses. He went to Harry  
17 Buffalo, he went to Barley House, he went to REBoL, he went  
18 to TownHall.

19 Q. Are you aware that this civil protection order --  
20 that the one other civil protection hearing that Mr. Douglas  
21 has been involved in was adjudicated in a hearing like this  
22 one?

23 MR. CONGENI: Your Honor, for  
24 purposes of simplicity, do we want to enter the  
25 CPO that we're discussing habitually here into

1 evidence now --

2 MR. PATTAKOS: You can enter it  
3 when you're --

4 MR. CONGENI: -- so he can  
5 reference it?

6 THE COURT: The question was  
7 referenced to me, Mr. Pattakos.

8 MR. CONGENI: Can I provide it  
9 to him so he can see the CPO as he's asked  
10 questions --

11 THE COURT: We can do that on  
12 cross.

13 MR. CONGENI: Okay, thank you,  
14 Your Honor.

15 THE COURT: You can continue,  
16 Mr. Pattakos.

17 BY MR. PATTAKOS:

18 Q. Are you aware that the civil protection order that  
19 you're talking about was actually adjudicated in court  
20 proceedings?

21 A. I wasn't aware and I don't know -- I don't even  
22 know what adjudicated means in a court proceeding.

23 Q. Okay.

24 A. I don't have his same experience --

25 THE COURT: There's not