

COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, SS.

BOSTON MUNICIPAL COURT  
CENTRAL DIVISION  
C.A. NO.

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PAM LERNER JEWELRY, INC. DBA )  
PAGEO, AND GEORGE PELZ, )  
Plaintiffs, )  
)  
v. )  
)  
LINDA G. DOE, )  
Defendant. )

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**AFFIDAVIT OF GEORGE PELZ**

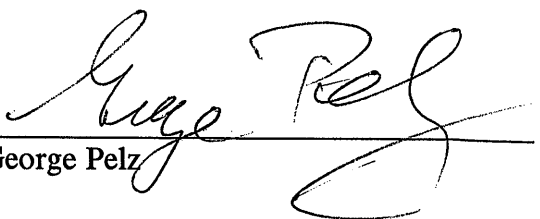
I, George Pelz, do hereby attest to and depose the following:

1. I am part owner of Pageo with my sister Pam Lerner Swartz. We started this business approximately 38-40 years ago by going door to door and now have three (3) stores.
2. I have read Linda G.'s postings and I have no idea who she is. Given what she says, this is very surprising. I have tried to communicate directly with her to see who she is and what exactly she is talking about, but unfortunately, she has simply responded with further attacks on me and my business.
3. Linda G. claims she, her husband, and friends were "loyal customers of Pageo" and "spent 100s of thousands of dollars" on jewelry.
4. Consumers who spend large amounts of money at our store are few and we know them well. We naturally value these people and do our best to cater to them. But they are few and we know them. I have no idea who Linda G. is.

5. Linda G. also claims she tried to pawn her jewelry at our store. She claims that she sold a diamond ring to me and that I “took all the jewelry” she has purchased at Pageo. We are not a pawn shop. We do allow clients to trade in prior purchases (for store credit) and have on very rare occasions purchased back jewelry for cash. Again, this is a very rare event, and I do not know who Linda G. is and, if what she says is true, I would expect to know her.
6. Linda G. seems to say I met her at a fundraiser. I no memory of ever meeting her at any such fundraiser. Moreover, anyone who does as much business with us as she claims, would know as (as we would know them) and knows Pam and I are brother and sister.
7. My business has been hurt by Linda G.’s defamation. She claims:
  - a. that Pageo lacked ethics;
  - b. that “George took all the jewelry that I had ever bought there and gave me peanuts for it!!”
  - c. that Mr. Pelz “ripped me off” and “Disgusting to take advantage of a woman like that!;”
  - d. that Pageo and Mr. Pelz scammed and ripped off many other vulnerable and desperate women; and,
  - e. that she has “on with . . . life and want/s/ nothing in return . . . /she/ just thought possibly . . . /she/ could help even if just one other woman from being scammed by YOU.”

8. Unfortunately, due to the nature of social media, these defamatory statements have been published worldwide and, in particular, to our competition and our customers. These statements have been the topic of conversations unfortunately with customers and my business has suffered.
9. I have been personally hurt by this person. I have a physical condition which unfortunately is exacerbated by the emotional distress this has caused me. This has been extremely stressful to be publically humiliated and bullied by a person I have no idea who she is. Aside from the statements above, she has stated:
- a. that Mr. Pelz “ripped me off” and “Disgusting to take advantage of a woman like that!”
  - b. that Pageo and Mr. Pelz scammed and ripped off many other vulnerable and desperate women; and,
  - c. that she has “on with . . . life and want/s/ nothing in return . . . /she/ just thought possibly . . . /she/ could help even if just one other woman from being scammed by YOU.”
10. I take great pride in my business and much of it is highly dependent on personal relations. I take great pride in my personal reputation. These statements, in such a public forum, have been personally devastating to me.

Signed under the Pains and Penalties of Perjury, this 10<sup>th</sup> Day of September, 2015.

  
George Pelz