IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT
IN AND FOR PASCO COUNTY, FLORIDA

TRULIEVE, INC., Plaintiff, v. NATHAN JUREWICZ, Defendant.	Case No.

COMPLAINT AND DEMAND FOR JURY TRIAL

1. Hiding behind the anonymity of the GanjaLeaks social media accounts, Defendant—who represents Trulieve's competitors and uses the email address shortsalenow@gmail.com—repeatedly defamed Trulieve by falsely accusing Trulieve of poisoning patients with illegal pesticides and mold and of hiring "illegal workers."

2. In fact, unlike many of the competitors Defendant represents, products utilized by Trulieve for integrated pest management are 100% organic and EPA and OMRI certified, the company does not sell products unless they have passed testing by third-party state-certified labs,[1] and Trulieve has implemented robust processes to ensure that its employees are legally authorized to work in the United States.

3. Trulieve brings this defamation action to set the record straight, to vindicate its rights under civil law, to hold Defendant accountable, to reveal Defendant's true motives, to obtain disgorgement of any profits Defendant may have made by defaming his clients' competitor, and to

[1] *Cannapprove: Trulieve's Product Quality and Testing Transparency Program*, Trulieve, https://www.trulieve.com/discover/product-test-search; *What is Trulieve: A Guide to Florida's Leading Dispensary,* THC Physicians, https://thcphysicians.com/what-is-trulieve/.

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recover compensatory damages of not less than $750,000.

PARTIES

4. Plaintiff Trulieve, Inc. was founded in Florida by three family-owned nurseries and is currently a licensed Medical Marijuana Treatment Center in Florida. Trulieve is incorporated in Florida, and its principal place of business is in Quincy, Florida.

5. Defendant Nathan Jurewicz is a resident of Land O'Lakes, Florida. On information and belief, he works for and has worked for a number of Trulieve's competitors (*i.e.*, mom-and-pop cannabis companies, hemp companies, and kratom companies); he created and operates numerous social media accounts under the username "GanjaLeaks," and he amplifies his GanjaLeaks posts by tagging and otherwise collaborating with Martha Bueno, Shai Ortiz, and others.

JURISDICTION AND VENUE

6. This Court has jurisdiction over this action pursuant to Article V, Section 5(b) of the Florida Constitution and Section 26.012(2) of the Florida Statutes because this suit is an action at law in which the matter in controversy exceeds the sum of $50,000, exclusive of interest, costs and attorney fees.

7. This Court has personal jurisdiction over Jurewicz because he is a Florida resident who resides in Pasco County, Florida.

8. Venue is proper in Pasco County pursuant to Section 47.011 of the Florida Statutes because Jurewicz resides in Pasco County, Florida.

9. All conditions precedent to this action have been performed.

COUNT ONE – DEFAMATION

10. Trulieve incorporates by reference the foregoing paragraphs and realleges them as

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if set forth fully herein.

11. On information and belief, Jurewicz published the following false and defamatory statements of fact about Trulieve:

a. On March 17, 2024, Jurewicz published an Instagram post in which he falsely claimed that Trulieve got "caught covering up that they poisoned their patients" with mold (featured in a photograph in the post).[2]

b. On September 15, 2024, Jurewicz published an Instagram post in which he falsely claimed: "Trulieve realizing they are about to be exposed for poisoning patients" with mold (featured in a photograph in the post).[3]

c. On June 11, 2024, Jurewicz published an X post in which he falsely claimed that Trulieve "deleted thousands of health complaints from the FDACS website."[4]

d. On September 30, 2024, Jurewicz published an X post in which he falsely claimed that "Trulieve's products are laced pesticides, herbicides, and fungicides that are not properly flushed."[5]

e. On October 3, 2024, Jurewicz published an X post in which he falsely claimed that Trulieve's Jefferson County cultivation facility had "products that are allegedly laced with pesticides, herbicides and fungicides that are not properly flushed" and "toxic levels of mold."[6]

f. On January 31, 2025, Jurewicz published an X post in which he falsely claimed that Trulieve was "hiring illegal workers."[7]

[2] Ganjaleaks, Instagram (March 17, 2024), https://www.instagram.com/p/C4oLUGyRm7Y/.
[3] Ganjaleaks, Instagram (Sept. 15, 2024), https://www.instagram.com/p/C_8nRIGytC3/.
[4] Ganja Leaks, X (June 11, 2024, 2:27 PM), https://x.com/GanjaLeaks/status/1800595767691796691.
[5] Ganja Leaks, X (Sept. 30, 2024, 11:50 AM), https://x.com/GanjaLeaks/status/1840781320479252843.
[6] Ganja Leaks, X (Oct. 3, 2024, 10:56 AM), https://x.com/GanjaLeaks/status/1841854889401495707.
[7] Ganja Leaks, X (Jan. 31, 2025, 11:46 AM), https://x.com/GanjaLeaks/status/1885369006212661418.

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12. Jurewicz's above statements are demonstrably false.

13. ***First***, Trulieve has never "poisoned patients" with "pesticides, herbicides and fungicides that are not properly flushed" or "toxic levels of mold." In fact, Trulieve does not sell products unless they have passed testing by independent state-certified labs that ensure compliance with all applicable regulations.[8]

14. ***Second***, Trulieve didn't—and obviously doesn't have the authority to—"delete[] thousands of health complaints from the FDACS website."

15. ***Third***, far from "hiring illegal workers," Trulieve has implemented robust processes to ensure its employees are legally authorized to work in the United States. As demonstrated during a routine audit conducted by the Florida Department of Law Enforcement ("FDLE"), Trulieve complies with all E-Verify and Form I-9 requirements, which verified employment eligibility for all Trulieve employees pursuant to state and federal law.

16. Jurewicz's above statements are defamatory and defamatory *per se* because they impute criminal conduct and/or conduct that tends to subject Trulieve to distrust, hatred, or contempt and because they tend to injure Trulieve in its trade.

17. Jurewicz's above statements are reasonably understood to be statements of fact about Trulieve because the posts explicitly identify Trulieve by name.

18. Jurewicz had no applicable privilege or legal authorization to publish the above false statements about Trulieve or, if he did, he abused it.

19. Jurewicz acted with actual malice, either knowingly or recklessly disregarding that the above statements he published about Trulieve were false, including by setting out with a

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[8] *See Cannapprove: Trulieve's Product Quality and Testing Transparency Program*, Trulieve, https://www.trulieve.com/discover/product-test-search; *see also What is Trulieve: A Guide to Florida's Leading Dispensary*, THC Physicians, https://thcphysicians.com/what-is-trulieve/.

financially motivated bias and a negative preconceived narrative to disparage his clients' biggest competitor, purposefully avoiding contacting Trulieve for facts before publication, and intentionally disregarding the publicly available sources cited above. Counsel for Trulieve also specifically put Jurewicz on written notice of the facts and evidence debunking the false claims in a series of letters requesting retractions on September 30, 2024, February 5, 2025, and March 24, 2025, for example:

- Attached to Trulieve's February 5, 2025 letter were two letters from Trulieve to the Florida Department of Commerce confirming that Trulieve has implemented robust procedures to ensure all of its employees are legally authorized to work in the United States—including a requirement that all employees pass a level 2 background check, conducted by FDLE and the Federal Bureau of Investigation. And that a routine audit conducted by FDLE confirmed that Trulieve complies with all E-Verify requirements as well as Form 1-9 verification requirements.
- Trulieve's March 24, 2025 letter directed Jurewicz to publicly available facts and sources debunking his claim that Trulieve's products have "poisoned patients" with "pesticides, herbicides and fungicides that are not properly flushed" or "toxic levels of mold" and confirming that all of Trulieve's products are independently tested for compliance with all applicable regulations by third-party, state-certified labs.

But Jurewicz refused to retract and continued to make the false claims. Upon information and belief, discovery will reveal substantial additional evidence of Jurewicz's actual malice, including the details of his motives and the extent to which he has financially benefitted from defaming Trulieve.

20. Jurewicz published the above false and defamatory statements about Trulieve

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intentionally, willfully, maliciously, and in conscious disregard of Trulieve's rights and reputation and of the truth.

21. Upon information and belief, Jurewicz's social media posts have been viewed by thousands of people.

22. Upon information and belief, Jurewicz worked with collaborators to create and amplify some of these defamatory statements. For example, many of Jurewicz's posts on his @ganjaleaks Instagram account—including the September 15, 2024 defamatory post—tag and are then instantly republished on the Instagram accounts of Martha Bueno (@buenoformiami) and Shai Ortiz (@shai.high), who collectively have nearly 20 thousand followers. As Jurewicz intended, through this republication, his September 15, 2024 post was viewed by at least thousands of additional people.

23. On information and belief, Trulieve lost sales to people who read Jurewicz's defamatory publications.

24. As a direct and foreseeable result of Jurewicz's publications, Trulieve has been forced to make an expenditure of more than $62,000 (and counting) to remedy the defamation.

25. As a direct and foreseeable result of Jurewicz's publications, Trulieve has suffered and will continue to suffer reputational and economic harm.

26. In view of the foregoing, Trulieve is entitled to compensatory, punitive, and other damages in an amount to be specifically determined at trial.

PRAYER FOR RELIEF

WHEREFORE, Trulieve respectfully requests that the Court:

i. Award Trulieve no less than $750,000 in compensatory damages; and

ii. Award Trulieve pre-and post-judgment interest, costs, and any such other

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and further relief as this Court may deem just and proper.

JURY DEMAND

Trulieve hereby demands a trial by jury on all issues so triable.

NOTICE OF INTENT TO SEEK PUNITIVE DAMAGES

Trulieve provides notice of its intent to seek punitive damages in accordance with Section 768.72 of the Florida Statutes.

Date: April 10, 2025

Respectfully Submitted,

/s/ *Shannon B. Timmann*
Shannon B. Timmann (Florida Bar No. 98810)
MEIER WATKINS PHILLIPS PUSCH LLP
919 18TH St NW, Suite 650
Washington, DC 20006
Telephone: 202-318-3655
Email: shannon.timmann@mwpp.com

Melanie Leitman (Florida Bar No. 091523)
STEARNS WEAVER MILLER, P.A.
106 East College Avenue, Suite 700
Tallahassee, FL 32301
Telephone: 850-329-4846
Primary: mleitman@stearnsweaver.com
Alternate: lrussell@stearnsweaver.com

Counsel for Plaintiff

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