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

TRULIEVE, INC., Plaintiff, v. NATHAN JUREWICZ, Defendant.	Case No. 2025-CA001071-CAAXES

PLAINTIFF'S MOTION FOR ENTRY OF JUDICIAL DEFAULT AGAINST DEFENDANT

Plaintiff Trulieve moves for entry of judicial default against the defendant, Nathan Jurewicz, under Florida Rule of Civil Procedure 1.500(b) because he has failed to plead or otherwise defend this matter.

Factual Background and Pre-suit Retraction Demand

1. Trulieve is a licensed Medical Marijuana Treatment Center in Florida. Jurewicz is a Florida resident who, on information and belief, has worked for several of Trulieve's competitors and operates social media accounts under the username "GanjaLeaks." Hiding behind that pseudonym, Jurewicz falsely accused Trulieve of poisoning patients with illegal pesticides and mold and of "hiring illegal workers." (Compl. ¶¶ 1, 11.) This case arises from those false and defamatory statements, that were published on social media websites X and Instagram. (*See* Compl. ¶ 11.)

2. Before filing suit, Trulieve's counsel sent three letters to Jurewicz. (*See* Compl. ¶ 19.) The first letter, dated September 30, 2024, explained why several of Jurewicz's statements were false and defamatory, and formally demanded retractions of the statements pursuant to section

UNOFFICIAL DOCUMENT

770.02, Florida Statutes. (*Id.*) After Jurewicz falsely accused Trulieve of "hiring illegal workers," Trulieve's counsel sent a second letter on February 5, 2025, which attached documentary evidence confirming 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." The documentary evidence also confirmed that an audit was conducted by FDLE, and "Trulieve complies with all E-Verify requirements as well as Form 1-9 verification requirements." (*Id.*) The third letter, sent on March 24, 2025, directed Jurewicz to publicly available facts and sources debunking his claims 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." (*Id.*) Like the first letter, the second and third letters also demanded retractions pursuant to section 770.02. (*Id.*)

3. Jurewicz publicly admitted to receiving the first letter though he never retracted any statements.[1] (*See* **Exhibit A**, Shannon Timmann Affidavit of Compliance with Fla. Stat. 48.161 ("Timmann Aff.") ¶ 5, filed Aug. 1, 2025.))[2]

Efforts at Personal Service

4. The complaint was filed on April 10, 2025, and the summons was issued on April 21, 2025. (*Id.* at ¶ 6.) Shortly thereafter, Trulieve, through its agents, undertook diligent efforts to locate and personally serve Jurewicz. (*Id.*) Those efforts included conducting skip trace searches, investigating and monitoring Jurewicz's social media and internet presence, reviewing public

[1] Nathan Jurewicz as "rabbitholeot," INSTAGRAM (Nov. 3, 2024), https://www.instagram.com/reel/DB67wxvSfYf/ (last visited August 21, 2025).
[2] The first two letters are attached to the Timmann Aff. in Exhibit B thereto. The third letter is attached as **Exhibit B** to this Motion.

UNOFFICIAL DOCUMENT

records databases for information related to Jurewicz and his whereabouts, attempting to personally serve Jurewicz at each address where he was believed to reside or spend time, and speaking with Jurewicz's father, other family members, and people believed to be associates about Jurewicz and his whereabouts. (*Id.* ¶¶ 6-11.)

5. During one such service attempt, on April 29, an individual who identified himself as Jurewicz's father called Jurewicz while in the presence of Trulieve's process server. During that call, Jurewicz stated that he intended to evade service and avoid going to court in this matter. (*Id.*) Even after that call, Trulieve, through its agents, continued its efforts to investigate Jurewicz's whereabouts, monitor his social media activity, and make additional attempts at personal service. (*Id.* ¶¶ 9-11.)

6. By June 10, 2025, Trulieve had attempted personal service at each location where Jurewicz was believed to have recently lived or regularly spent time. (*Id.* ¶ 11.) There were (and remain) no additional leads as to where Jurewicz may be found or served. (*Id.*)

7. Because Jurewicz was actively and successfully concealing his whereabouts, had publicly admitted to receiving a retraction letter, and had stated his intent to evade service, Trulieve initiated substituted process under section 48.161, Florida Statutes. *See Smith v. Leaman*, 826 So. 2d 1077, 1078 (Fla. 2nd DCA 2002) ("Section 48.161, which allows for substituted service of process on a Florida resident who is concealing his whereabouts, creates an exception to the general rule that the defendant must be personally served."); *Vega v. PBS Constr. LLC*, No. 6:23-CV-940-PGB-EJK, 2023 WL 6809633, at *3 (M.D. Fla. Oct. 16, 2023) ("Therefore, the Court finds that serving the Secretary of State on behalf of Prindii as an individual is proper, pursuant to [Fla. Stat. 48.161], because Prindii is a Florida resident concealing his whereabouts.")

UNOFFICIAL DOCUMENT

Substituted Service Under Section 48.161, Florida Statutes

8. On June 10, 2025, Trulieve initiated substituted process by sending through registered mail two copies of (1) the complaint and (2) the court-issued summons to the Florida Secretary of State. (*Id.* ¶ 12.) The Florida Secretary of State issued notice of acceptance of service on July 2, 2025. (*Id.* ¶ 13.) Undersigned counsel received the notice on July 18, 2025. (*Id.*) That same day, undersigned counsel sent, by registered mail and email, notice of service on the Florida Secretary of State and a copy of process to Jurewicz at his last known physical address and to his two known email addresses—the same email addresses where Trulieve sent the retraction letter that Jurewicz publicly admitted to receiving. (*Id.* ¶¶ 12-14; *compare id.* Exhibit B *with id.* Exhibit H.) On August 1, undersigned counsel filed an Affidavit of Compliance with section 48.161, Florida Statutes. (*i.e.*, the Timmann Aff.).

Entry of Judicial Default

9. Judicial default is warranted here because Jurewicz has failed to timely respond to the complaint or otherwise defend this matter. Fla. R. Civ. P. 1.500(b).

10. Florida Rule of Civil Procedure 1.140 requires Jurewicz to respond to the complaint within 20 days after service. In the context of substituted service, "[s]ervice of process is effectuated under this section on the date the service is received by the Department of State." Fla. Stat. 48.161(7).

11. Here, that date is no later than July 2, when the Department of State issued notice of acceptance of service. Accordingly, under the plain terms of section 48.161(7), Jurewicz's deadline to respond to the complaint expired on July 22, 2025. Further, even if the date Jurewicz was provided notice of substituted service (July 18) were treated as the date of service, the deadline to respond to the complaint would have expired on August 7.

UNOFFICIAL DOCUMENT

12. Jurewicz has failed to respond to the complaint or even provide notice of intent to contest the claims against him. Accordingly, Trulieve asserts that entry of a judicial default against Jurewicz is warranted and proper under Rule 1.500(b) of the Florida Rules of Civil Procedure.

Respectfully submitted,

/s/ *Melanie Leitman*
Melanie Leitman, Esq.
Florida Bar No. 091523
STEARNS WEAVER MILLER WEISSLER
ALHADEFF & SITTERSON, P.A.
106 East College Avenue, Ste. 700
Tallahassee, Florida 32301
Telephone: (850) 329-4853
mleitman@stearnsweaver.com
aruddock@stearnsweaver.com

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

Counsel for the Plaintiff

UNOFFICIAL DOCUMENT

CERTIFICATE OF SERVICE

I hereby certify that (1) a true and correct copy of the foregoing was filed using the Florida Courts E-Filing Portal this 22nd day of August, 2025 which will send notice to all counsel of record, and (2) I served courtesy copies of the foregoing by mail and email to the defendant, Nathan Jurewicz, at his last known address and email addresses:

Nathan Jurewicz
3053 Calvano Dr.
Land O Lakes, FL 34639
Email: shortsalenow@gmail.com
Email: njurewicz@gmail.com

/s/ *Melanie Leitman*
Melanie Leitman

UNOFFICIAL DOCUMENT

Exhibit A

To Pl.'s Mot. for Entry of Default

(Timmann Affidavit)

UNOFFICIAL DOCUMENT

Filing # 228584128 E-Filed 08/01/2025 05:09:21 PM

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

TRULIEVE, INC.

Plaintiff,

Case No.: 512025CA001071CAAXES

v.

NATHAN JUREWICZ,

Defendant.
_____/

NOTICE OF FILING AFFIDAVIT

Plaintiff TRULIEVE, INC., gives notice of filing the attached Affidavit of Compliance of Shannon Timmann to Defendant, NATHAN JUREWICZ.

Respectfully submitted,

/s/*Melanie Leitman*
Melanie Leitman, Esq.
Florida Bar No. 091523
STEARNS WEAVER MILLER WEISSLER
ALHADEFF & SITTERSON, P.A.
106 East College Avenue, Ste. 700
Tallahassee, Florida 32301
Telephone: (850) 329-4853
mleitman@stearnsweaver.com
aruddock@stearnsweaver.com

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

Counsel for the Plaintiff

UNOFFICIAL DOCUMENT

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was filed using the Florida Courts E-Filing Portal this 1st day of August, 2025 which will send notice to all counsel of record.

/s/Melanie R. Leitman
Attorney

UNOFFICIAL DOCUMENT

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

TRULIEVE, INC., Plaintiff, v. NATHAN JUREWICZ, Defendant.	Case No. 2025-CA001071-CAAXES

AFFIDAVIT OF COMPLIANCE WITH FLA. STAT. 48.161

I, Shannon Timmann, being duly sworn, depose and say as follows:

1. I am an attorney at the law firm Meier Watkins Phillips Pusch LLP, counsel of record for the plaintiff in the above-captioned case. I am familiar with the factual and procedural background of this case and the plaintiff's efforts to serve the defendant.

Factual background and pre-suit investigation

2. The plaintiff is a licensed Medical Marijuana Treatment Center in Florida. The defendant, Nathan Jurewicz, is a Florida resident who, on information and belief, has worked for several of the plaintiff's competitors and operates social media accounts under the username "GanjaLeaks." Hiding behind that pseudonym, the defendant falsely accused the plaintiff of poisoning patients with illegal pesticides and mold and of hiring "illegal workers." This case arises from those false and defamatory statements, which were published on X (formerly Twitter) and Instagram.

3. Because the defamatory statements were published under a pseudonym, my office investigated the identity and whereabouts of the defendant before filing suit. To that end, my office

UNOFFICIAL DOCUMENT

also engaged Guidepost Solutions LLC ("Guidepost"), a global investigations firm, to investigate the individual(s) operating the GanjaLeaks social media accounts. Guidepost analyzed various, and publicly available, information related to GanjaLeaks and Nate Jurewicz and concluded that the defendant, Nate Jurewicz, "almost certainly" is GanjaLeaks. Guidepost compiled its findings in a written report, which is attached here as **Exhibit A**.

4. Guideposts's findings were consistent with my office's own investigation, which included a skip trace search and review of publicly available social media information related to GanjaLeaks and Nathan Jurewicz.

5. After determining the defendant's identify, my office sent two letters to the defendant. The first letter, dated September 30, 2024, explained why several of the defendant's statements were false and defamatory, and formally demanded retraction of the statements pursuant to Fla. Stat. 770.02. The defendant later published a video in which he acknowledged receiving the letter and endorsed GanjaLeaks's work despite nominally denying that he was GanjaLeaks.[1] The second letter, dated February 5, 2025, was issued after the defendant falsely accused the plaintiff of "hiring illegal workers." The second letter, like the first, corrected the record and demanded retraction. Both letters are attached here as **Exhibit B**. The defendant never retracted any statements nor responded directly to my office, despite having publicly admitted to receiving the first letter.

Efforts at personal service

6. The complaint was filed on April 10, 2025, and the summons was issued on April 21, 2025. Shortly thereafter, my office engaged Proof Technology, Inc. ("Proof"), a professional process server located at 5811 Jenny Drive, Tampa, Florida, 33617, to serve the defendant. My

[1] https://x.com/LMCxLUC/status/1853244097567613411.

UNOFFICIAL DOCUMENT

office then worked with Proof to attempt to locate and serve the defendant.

7. Proof's efforts at personal service are detailed in the affidavit attached here as **Exhibit C**. In sum, Proof attempted service at the address identified in the complaint, 3053 Calvano Drive, Land O Lakes, Florida, 34639. After Proof was unsuccessful in serving the defendant there and was told that he had moved away from that address, Proof ran a skip trace search in an attempt to locate the defendant. Those search results corroborated the skip trace search that my office had already conducted independently.

8. My office then engaged Spotlight Legal Solutions LLC ("Spotlight"), another process server located at 1910 East Palm Avenue, Tampa, Florida 33605, closer to where we believed the defendant was located. Upon engaging Spotlight, my office provided the results of our skip trace search and informed Spotlight of our service efforts to date. Spotlight then attempted personal service on multiple occasions and at multiple addresses. These efforts are detailed in the affidavit attached here as **Exhibit D.**

9. During one service attempt, an individual who identified himself as the defendant's father called the defendant while in the presence of the Spotlight process server. During that call, the defendant stated that he intended to evade service and avoid going to court in this matter.

10. Even after the defendant stated that he intended to evade service, the process server continued to investigate the defendant's whereabouts, monitor his social media activity, and make additional attempts at personal service. (*See id.*)

11. By June 10, 2025, Spotlight had attempted personal service at each location where the defendant is believed to have recently lived or regularly spent time. There were (and remain) no additional leads as to where the defendant may be found or served.

UNOFFICIAL DOCUMENT

Substituted service under Fla. Stat. 48.161

12. On June 10, 2025, my office initiated substituted process under Fla. Stat. 48.161 by sending through registered mail two copies of (1) the complaint and (2) the court-issued summons to the Florida Secretary of State. A copy of that mailing is attached here as **Exhibit E**.

13. The Florida Secretary of State issued notice of acceptance of service on July 2, 2025. A copy of the notice is attached as **Exhibit F**. My office received that notice on July 18, 2025. A copy of the July 18 transmittal email is attached here as **Exhibit G**.

14. On the same day, July 18, my office sent, by registered mail and email, notice of service on the Florida Secretary of State and a copy of process to the defendant at his last known physical address and to his two known email addresses. Copies of these correspondences are attached here as **Exhibit H**.

15. I understand that I am swearing or affirming, under oath, to the truthfulness of the claims made in this affidavit and that the punishment for knowingly making false statements under oath may include fines or imprisonment, or both.

FURTHER SAYETH THE AFFIANT NAUGHT.

UNOFFICIAL DOCUMENT

I declare under penalty of perjury that the record of which this declaration is a part or to which it is attached is the same record on which E'Chanda Manette Goodman, a notary public, performed a notarial act and before whom I appeared by means of communication technology on August 1, 2025.

Shannon Timmann

State of Texas ~~District of Columbia.~~ 08/01/2025
County of Jefferson

Signed and sworn before me on this 1st day of August, 2025.
by Shannon Timmann who produced Virginia DL as identification

Dated: August 1, 2025.

E'Chanda Manette Goodman
Notary Public

Exp: 08/25/2028
(Commission Expires)

E'Chanda Manette Goodman
Remote Online Notary Public

ECHANDA MANETTE GOODMAN
Notary ID #132642149
My Commission Expires
August 25, 2028

This notarial act was an online notarization along with multi-factor authentication and using audio/video recording.

UNOFFICIAL DOCUMENT

Exhibit A

UNOFFICIAL DOCUMENT

Guidepost

Bradley L. Dizik
President
Guidepost Solutions LLC



WE ARE YOUR GUIDEPOST.

The following report is furnished for the sole and exclusive use of the client to whom it is provided. We often use third party sources and database providers in the course of our work. We believe that the sources and methodologies we use are reliable; however, we make no representation or guarantees as to the accuracy or completeness of information obtained through third party sources and database providers. **PRIVILEGED AND CONFIDENTIAL**

Table of Contents

Executive Summary **3**

GanjaLeaks **4**

Social Media Accounts 4

Email Addresses 6

Nate Jurewicz **6**

Appendix: Definitions of Probability and Confidence **10**

UNOFFICIAL DOCUMENT

Executive Summary

Guidepost Solutions was tasked with investigating the X and Instagram user *@GanjaLeaks*. **Nate Jurewicz (born April 16 1981) of Land O Lakes, Florida very likely is GanjaLeaks, based on his name association with GanjaLeaks' Patreon account and his true name involvement in cannabis-related activism.**

- GanjaLeaks has Instagram, Patreon, Reddit, Threads, TikTok, X, and YouTube accounts that all have the same username, *ganjaleaks,* and profile image.

- Email address ganjaleaks@protonmail[.]com is associated with the X account *@ganjaleaks* and was created on 15 March 2023.

- GanjaLeaks' Patreon account is associated with the name "Nate Jurewicz" and was created on 15 March 2023.

- Nathan Christopher Jurewicz is a self-described Cannabis Entrepreneur, Digital Marketing and Sales Messaging Expert. Jurewicz is featured in a video on GanjaLeaks' YouTube channel.

UNOFFICIAL DOCUMENT

GanjaLeaks

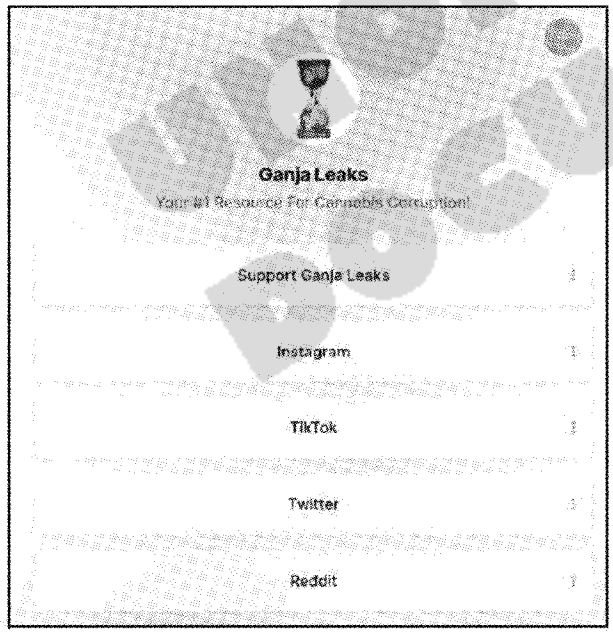
Investigators reviewed information from GanjaLeaks' X and Instagram accounts and found additional accounts on other social media platforms. Investigators also identified the email address associated with GanjaLeaks' X account and another possible email address for GanjaLeaks.

Social Media Accounts

Investigators reviewed information from GanjaLeaks' X and Instagram accounts and found that both accounts were created in March 2023 and contain a link to ganjaleaks[.]com in their profiles.

Ganjaleaks[.]com redirects users to a Linktree page that contains links to GanjaLeaks' Patreon, Instagram, TikTok, X (Twitter), and Reddit accounts. Investigators also found that GanjaLeaks has YouTube and Threads accounts. Investigators note that the Reddit and YouTube accounts were created on 15 and 17 March 2023, respectively. All of GanjaLeaks' accounts use the same username, *ganjaleaks*, and profile image of an hourglass in the style of the WikiLeaks logo.

UNOFFICIAL DOCUMENT



Graphic 1: GanjaLeaks' Linktree page.[1]



Graphic 2: GanjaLeaks' X profile.[2]

[1] https://linktr[.]ee/ganjaleaks
[2] https://x[.]com/ganjaleaks



Graphic 3: GanjaLeaks' Instagram profile.[3]



Graphic 4: GanjaLeaks' Thread profile.[4]



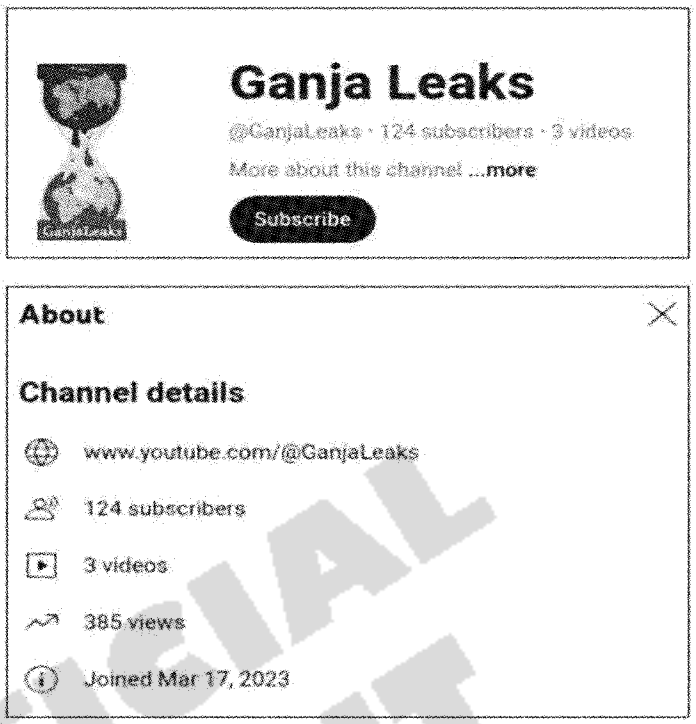
Graphic 5: GanjaLeaks' Patreon profile.[5]

UNOFFICIAL DOCUMENT

[3] https://www.instagram[.]com/ganjaleaks
[4] https://www.threads[.]net/@ganjaleaks
[5] https://www.patreon[.]com/GanjaLeaks



Graphic 6: GanjaLeaks' Reddit profile.[6]



Graphic 7: GanjaLeaks' YouTube profile.[7]

UNOFFICIAL DOCUMENT

Email Addresses

Investigators confirmed that the email address ganjaleaks@protonmail[.]com is associated with the X account @ganjaleaks, but we did not find it to be associated with any other online accounts. Investigators note that the email address ganjaleaks@protonmail[.]com was created on 15 March 2023, the same day as the aforementioned Reddit account. Investigators also found that ganjaleaks@gmail[.]com] is a valid email address, but we did not find it to be associated with any online accounts, nor is it associated with any password recovery information.

Nate Jurewicz

Technical data from the GanjaLeaks Patreon account indicates the account is associated with the name Nate Jurewicz and was created on 15 March 2023, the same day as the Proton Mail and Reddit accounts. Nathan Christopher Jurewicz (born April 1981) of Land O Lakes, Florida is a "Cannabis Entrepreneur, Digital Marketing and Sales Messaging Expert," according to his LinkedIn profile.[8] Jurewicz is also the founder of Christians for Cannabis, which aims to educate religious people about how Christians should handle this

[6] https://www.reddit[.]com/user/GanjaLeaks/
[7] https://www.youtube[.]com/@ganjaleaks
[8] https://www.linkedin[.]com/in/nathanjurewicz

controversial topic.[9] Jurewicz appeared on the "Happy Hour Holidaze" podcast in December 2023 and discussed "his personal journey from being a pastor's son to embracing cannabis for chronic pain."[10] Jurewicz's social media profiles contain a link to www.whatwouldjesusdoaboutweed[.]com, which contains a video of Jurewicz promoting his free book, "What Would Jesus Do About Weed?" hosted on Jurewicz's personal YouTube page.[11] Investigators also note that GanjaLeaks' YouTube channel contains a video posted on 14 February 2024 titled "Florida man exposes FL GOV deleting consumer reports of people exposed to Toxic Trulieve Products" that features Jurewicz speaking at a likely Florida House Agriculture and Natural Resources Appropriations Subcommittee hearing.[12] Jurewicz is associated with 3053 Calvano Dr, Land O Lakes, FL 34639 and may be associated with phone numbers 813-624-2884 and 727-433-3120 and email addresses shortsalenow@gmail[.]com and njurewicz@gmail[.]com.[13]



ENGAGEMENT DOCUMENT

[9] https://www.instagram[.]com/wwjdweed/
[10] https://www.iheart[.]com/podcast/269-happy-hour-holidaze-118559197/episode/e27-navigating-faith-and-healing-138775857/
[11] https://www.youtube[.]com/@natejurewicz5194
[12] https://www.youtube[.]com/watch?v=rW8eSt0CCgk
[13] https://www.beenverified[.]com/rf/report/person?bvid=N_MDAxMjkzOTY2Mjcy&showPartialAddresses=false

Experience

Digital Marketing Specialist
Freelance
Jan 2011 - Present · 13 yrs 9 mos
Land O' Lakes, Florida, United States

Marketing Strategy, Social Media Marketing and +2 skills

Member
Net Venture Profits LLC
Sep 2010 - Present · 14 yrs 1 mo

Internet Marketing Expert Providing cutting edge strategies on how to sell information type products through Internet Marketing and coaching programs through Internet Marketing ...see more

Digital Copywriter
Real World Prep LLC · Self-employed
Jan 2009 - Present · 15 yrs 9 mos
Land O' Lakes, Florida, United States · Remote

President
Loss Mitigation Training Institute
Jun 2008 - Present · 16 yrs 4 mos

Real Estate Investing Expert and specializes Giving real world content on cutting edge strategies of how to generate cash through real estate investing, flip short sales through real estate ...see more

Short Sale Kid
Short Sale & Loss Mitigation Solutions, LLC
2008 - 2009 · 1 yr

Education

Tampa Education Academy of Christian Heritage
High School Diploma

Home Schooled
High School Diploma

UNOFFICIAL DOCUMENT

Graphics 8 & 9: Nate Jurewicz's LinkedIn profile.[14]

[14] https://www.linkedin[.]com/in/nathanjurewicz



changeyourfatewithnate Follow Message ...

173 posts **1,482** followers **7,500** following

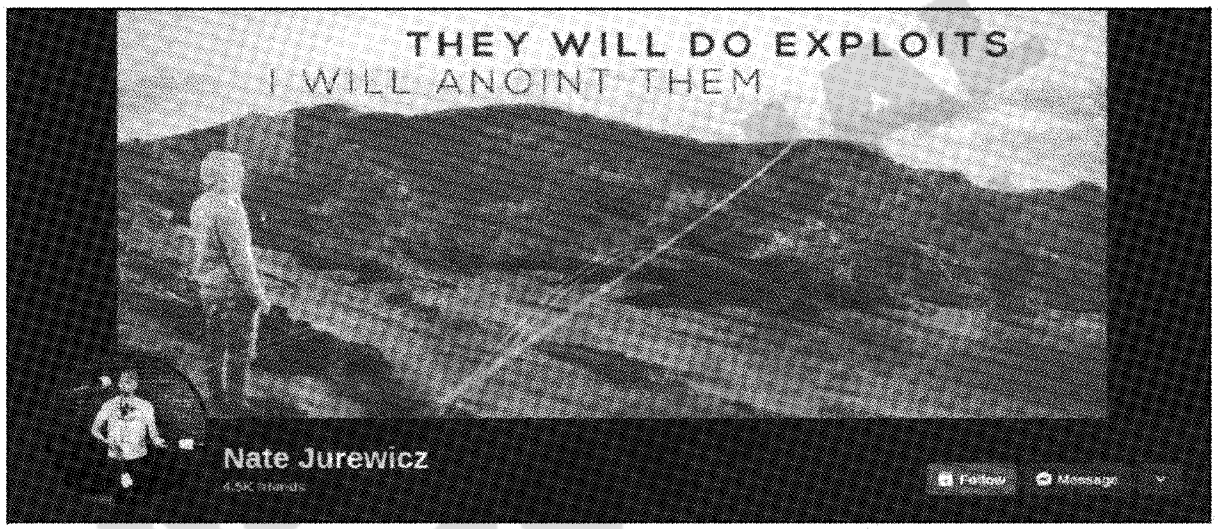
Nate Jurewicz

changeyourfatewithnate

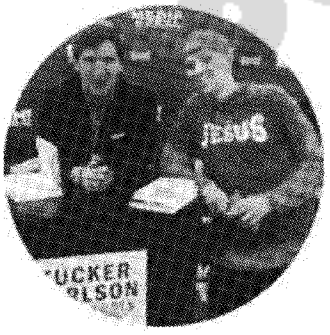
My name is Nate... follow me 🤍 Get on my email list and get the full scoop about the Christians For Cannabis Movement &... more

www.whatwouldjesusdoaboutweed.com

Graphic 10: Nate Jurewicz's Instagram profile.[15]



Graphic 11: Nate Jurewicz's Facebook profile.[16]



Nate Jurewicz

@natejurewicz5194 · 6 subscribers · 1 video

More about this channel ...more

Subscribe

Graphic 12: Nate Jurewicz's YouTube profile.[17]

[15] https://www.instagram[.]com/changeyourfatewithnate/
[16] https://www.facebook[.]com/jurewicznathan/
[17] https://www.youtube[.]com/@natejurewicz5194

Appendix: Definitions of Probability and Confidence

Guidepost Use of Probabilistic Analytic Language

Guidepost uses terms such as "likely" and "probably" to convey analytic judgments. The table below shows the spectrum of how those terms correlate with percentages of likelihood.

Assessment Language	Almost no chance	Very unlikely	Unlikely/ Improbably	Possibly	Likely/ Probably	Very likely	Almost certainly
Percentages	<5%	6-20%	21-45%	46-55%	56-80%	81-95%	96-99%

Guidepost Use of Confidence Levels

Where helpful, we also include confidence levels that highlight the quality of information underpinning an analytic judgment.

- **Low confidence** usually indicates that the information is too fragmentary or questionable to make solid analytic judgments.
- **Moderate confidence** means the pieces of information are credibly sourced and plausible but not highly corroborated.
- **High confidence** is associated with high-quality information and data that is corroborated by other credible information.

UNOFFICIAL DOCUMENT

Exhibit B

UNOFFICIAL DOCUMENT

Subject: Time-Sensitive Legal Correspondence re Trulieve
Date: Monday, September 30, 2024 at 4:02:48 PM Eastern Daylight Time
From: Shannon Timmann <shannon.timmann@mwpp.com>
To: shortsalenow@gmail.com <shortsalenow@gmail.com>, njurewicz@gmail.com <njurewicz@gmail.com>
CC: Megan Meier <megan.meier@mwpp.com>
Priority: High
Attachments: image001.png, 20240930 Ltr from M. Meier to Ganja Leaks re Trulieve.pdf

Mr. Jurewicz,

Please see the attached letter and confirm receipt of the same.

Best,

Shannon

Shannon B. Timmann, Counsel
MEIER WATKINS PHILLIPS PUSCH
919 18th Street NW, Suite 650
Washington, DC 20006
Direct: +1 (850) 322-8251
Website | Bio

MWPP | MEIER WATKINS PHILLIPS PUSCH

UNOFFICIAL DOCUMENT

MEIER
WATKINS
PHILLIPS
PUSCH

Megan L. Meier
megan.meier@mwpp.com
+1 (202) 280-4454

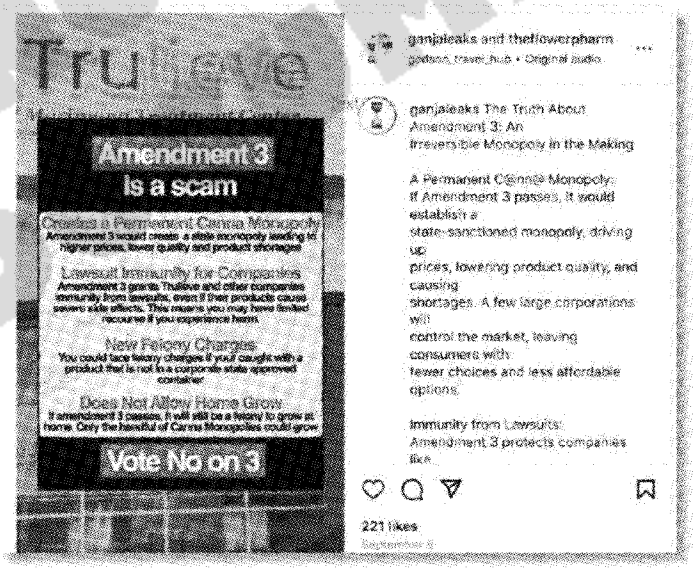
September 30, 2024

Nathan Jurewicz
3053 Calvano Dr.
Land O Lakes, FL 34639
Email: shortsalenow@gmail.com
Email: njurewicz@gmail.com

Re: ***Trulieve, Inc.***

Dear Mr. Jurewicz:

We write on behalf of our client, Trulieve, Inc., to demand that you stop spreading misinformation on the @GanjaLeaks Instagram account, X account, and elsewhere. In one post, on September 9, 2024, over an image of a Trulieve treatment center, you posted text falsely charging Trulieve with promoting a "scam," falsely claiming that Amendment 3 would supposedly "create[] a permanent canna monopoly…leading to higher prices, lower quality and product shortages" and impose "new felony charges" for those "caught with a product that is not in a corporate state approved container." Below that text, you posted: "The Truth about Amendment 3: An Irreversible Monopoly in the Making… **A Permanent C@nn@bis Monopoly: If Amendment 3 passes, it would establish a state-sanctioned monopoly, driving up prices, lowering product quality, and causing shortages. A few large corporations will control the market, leaving consumers with fewer choices and less affordable options."



In another post, on March 12, 2024, you falsely accused Trulieve of "getting caught covering up that they poisoned their patients" with mold that you falsely claimed was photographed "at the new Trulieve 'State of the art' Jefferson County Grow."

UNOFFICIAL DOCUMENT



In another post, on September 15, 2024, over the same image of mold from the prior post, you wrote, "Trulieve realizing they are about to be exposed for poisoning patients. Undermining their amendment 3 monopoly." In the text below the visual content, you posted, "The Truth about @trulieve_ @ Amendment 3: A Threat to Fair Competition and Consumer Rights. **A Permanent C@nn@bis Monopoly:** Amendment 3 would create a state-sanctioned monopoly, handing control of the c@annabis market to a few large corporations. This move would inevitably lead to higher prices, lower product quality, and potential shortages. With a monopoly in place, consumers would be left with fewer choices and more expensive options, all to benefit the corporate giants…**A Ban on Home Cultivation:** Amendment 3 would permanently prohibit individuals from growing c@nn@bis at home. This ensures that only corporate monopolies have the exclusive right to cultivate, making it illegal for individuals to grow for personal use."



And during a discussion that was recently posted to X, you claimed that "Trulieve employees have come forward with videos exposing the horrific conditions of Jefferson County's cultivation facility. We will be posting on our Instagram page images and videos of hundreds of plants

UNOFFICIAL DOCUMENT

covered in mold and acids. We also have evidence of illegal pesticide use and not properly flushing products."

These claims are demonstrably false.

First, there are currently 25 independently owned and operated, licensed Medical Marijuana Treatment Centers ("MMTC") in Florida, which, under the state's current regulations, are the only businesses licensed to cultivate and dispense cannabis in Florida. In addition, the Florida Department of Health is authorized to issue an additional 22 licenses to companies. A competitive marketplace of 25 companies (and growing) is not a monopoly. Far from establishing a (non-existent) "monopoly," Amendment 3 would ***increase*** competition and ***expand*** the field of licensed companies by allowing adults to purchase marijuana not only from licensed MMTCs but also from non-MMTC licensed companies. See Amendment 3, Article X, Section 29(a)(5). If Amendment 3 passes, it would authorize the state legislature to grant ***additional*** licenses to produce and sell cannabis for adult personal use, allowing participation by even more companies currently shut out of the market by Florida's regulatory scheme.

Second, Amendment 3 would not impose "new felony charges" for those "caught with a product that is not in a corporate state approved container," nor would it "permanently prohibit individuals from growing cannabis at home" or "make it illegal for individuals to grow for personal use." It is already a felony to possess cannabis with intent to sell, manufacture, or deliver it. See Florida Statutes § 893.13, § 893.03(1)(c). Far from making possession a felony or making it illegal for people to grow for personal use, Amendment 3 would liberalize existing law by explicitly authorizing adults to possess up to 3 ounces of cannabis for personal use.

Third, Trulieve has never poisoned patients, nor does the photograph of mold that you posted depict a Trulieve facility. If you have photos or videos of "hundreds of plants covered in mold and acids" as you said on X, they aren't from a Trulieve facility because there aren't any Trulieve facilities with such conditions. Please provide copies of any photos or videos you've received so that we have an opportunity to point out details proving that the images aren't what they have been represented to be.

Fourth, there's no evidence of "illegal pesticide use" at Trulieve because Trulieve doesn't use illegal pesticides. Trulieve uses only pesticides that are registered with the EPA and OMRI certified, 100% organic.

Your false claims about Trulieve expose you to substantial risk of defamation liability because they tend to subject Trulieve to distrust and because they tend to injure Trulieve in its trade. *Richard v. Gray*, 62 So. 2d 597, 598 (Fla. 1953).

You're entitled to oppose Amendment 3, and other voters are entitled to their opinions, too. But voters should form their opinions based on facts, not fiction. They should not be misled by deceptive claims into voting against a ballot initiative that they would otherwise support. Given the importance of the integrity of public debate on this topic, we hope that you will do the right thing, delete the false posts, and fact-check any other anti-Amendment-3 ads before posting them. For the avoidance of doubt, this constitutes a formal demand for retraction pursuant to Florida Statute § 770.02.

UNOFFICIAL DOCUMENT

Failure to comply with this request could result in substantial damages to Trulieve and leave the company with no choice but to pursue litigation to be made whole. We hope that does not become necessary.

Reserving all rights.

Kind regards,



Megan L. Meier

UNOFFICIAL DOCUMENT

Subject: Time-Sensitive Legal Correspondence re Trulieve
Date: Wednesday, February 5, 2025 at 6:30:21 PM Eastern Standard Time
From: Shannon Timmann <shannon.timmann@mwpp.com>
To: shortsalenow@gmail.com <shortsalenow@gmail.com>, njurewicz@gmail.com <njurewicz@gmail.com>
CC: Megan Meier <megan.meier@mwpp.com>
Priority: High
Attachments: image001.png, 20250205 M.Meier Ltr to GanjaLeaks re Trulieve.pdf

Mr. Jurewicz,

Please see the attached letter and confirm receipt of the same.

Best,

Shannon

Shannon B. Timmann, Counsel
MEIER WATKINS PHILLIPS PUSCH
919 18th Street NW, Suite 650
Washington, DC 20006
Direct: +1 (850) 322-8251
Website | Bio

MWPP MEIER WATKINS PHILLIPS PUSCH

Chambers TOP RANKED High Net Worth 2024 Meier Watkins Phillips Pusch LLP

UNOFFICIAL DOCUMENT

MEIER
WATKINS
PHILLIPS
PUSCH

Megan L. Meier
megan.meier@mwpp.com
+1 (202) 280-4454

February 5, 2025

Nathan Jurewicz
3053 Calvano Dr.
Land O Lakes, FL 34639
Email: shortsalenow@gmail.com
Email: njurewicz@gmail.com

Re: *Trulieve, Inc.*

Dear Mr. Jurewicz:

We write again on behalf of our client, Trulieve, Inc., to demand that you stop spreading misinformation on the @GanjaLeaks X account and elsewhere.

Last Friday, January 31, 2025, you tweeted: "What does @WiltonSimpson @Daniel_PerezFL @ Sen_Albritton and @JoeGruters have in common? They answer to Trulieve, not the people of Florida. This is why leadership in the legislature is advocating for rolling back florida's integration laws. So Trulieve can continue hiring illegal workers while they lobby to make federally legal hemp/THCA a felony." *See* https://x.com/ganjaleaks/status/1885369006212661418?s=42.

Far from lobbying so that it "can continue hiring illegal workers" as you falsely claimed, Trulieve has implemented robust processes to ensure that its employees are legally authorized to work in the United States. As demonstrated during a routine audit, Trulieve complies with all E-Verify requirements and Form I-9 requirements, verifying employment eligibility for all Trulieve employees pursuant to state and federal law. *See* Jan 31, 2025 Letter from Trulieve to the Florida Dept. of Commerce (Ex. A); Feb 3, 2025 Letter from Trulieve to the Florida Dept. of Commerce (Ex. B). And in response to a recent inquiry, Trulieve has made its I-9 documentation available for inspection by the Florida Department of Commerce. *See id.* And Trulieve has never lobbied "to make federally legal hemp/THCA a felony."

Given the importance of the integrity of public debate on these topics, we hope that you will do the right thing, delete the false post, and fact-check any other claims about Trulieve before posting them.

For the avoidance of doubt, this constitutes a formal demand for retraction pursuant to Florida Statute § 770.02.

Reserving all rights.

UNOFFICIAL DOCUMENT

Kind regards,



Megan L. Meier

UNOFFICIAL DOCUMENT

EXHIBIT A of B

(Trulieve Letter to Danielle Lucas)

UNOFFICIAL DOCUMENT

Trulieve

January 31, 2025

Danielle Lucas, Senior Attorney
Florida Department of Commerce
Office of the General Counsel
107 East Madison Street, MSC 110
Tallahassee, Florida 32399-4128

Dear Ms. Lucas,

We are in receipt of your letter dated January 28, 2025. As you note in your email, the Florida Department of Commerce is aware that the Florida Department of Law Enforcement performed a routine audit of Trulieve, Inc.'s procedures related to verification of new employees' employment eligibility. As demonstrated in the audit, Trulieve complies with all E-Verify requirements as well as the Form I-9 verification requirements.

Trulieve utilizes SAP SuccessFactors as its human capital management system. SuccessFactors is an industry leading HCM, and allows for centralized collection and storage of employee records. All new employees are onboarded via the SuccessFactors platform. The onboarding process is linear and does not allow steps to be skipped. Each step must be completed prior to moving to a subsequent step.

The I-9 verification process is a step in the onboarding process and includes uploading of required identification records. These identification records as well as completed I-9 forms are stored in SuccessFactors with our employees' individual employment records. This process ensures compliance with I-9 document retention requirements.

The E-Verify process is also a step in our onboarding process. Trulieve's SuccessFactors system is directly connected to the E-Verify system. The E-Verify case details and results are retained in our employees' individual employment records.

In addition to compliance with E-Verify and the I-9 process, all Trulieve employees are required to pass a level 2 background check as a condition of employment. Documentation of the background checks is submitted and reviewed by the Florida Department of Health.

In connection with the FDLE audit, it was discovered that during the initial implementation of the E-Verify requirements, there was a 120-day period where SuccessFactors was not linked to the E-Verify system. Trulieve retained the required I-9 forms and copies of employee passports or driver's licenses. Secondary identification documentation has since been secured.

In connection with the FDLE audit, copies of documentation Trulieve relied on to verify new employee's employment eligibility was provided via a secure virtual data room. We can provide the Department with access to that data room to satisfy its information request. We will need email addresses for all Department employees who need such access.

Please let me know if you have any questions or it would be useful to discuss the process further on a call. I can be reached at (770) 330-0831. We look forward to working with the Department to demonstrate our compliance with this important process.

Best regards,

Eric Powers
Chief Legal Officer

OFFICIAL DOCUMENT

EXHIBIT B of B

(Trulieve Letter to Danielle Lucas)

UNOFFICIAL DOCUMENT

Trulieve

February 3, 2025

Danielle Lucas, Senior Attorney
Florida Department of Commerce
Office of the General Counsel
107 East Madison Street, MSC 110
Tallahassee, Florida 32399-4128

Dear Ms. Lucas,

In furtherance of my letter dated January 31, 2025, we are providing the Florida Department of Commerce the documentation related to verification of new employees' employment eligibility requested in your letter dated January 28, 2025. Our compliance with section 448.095(2)(d), Florida Statutes, is evidenced by the materials enclosed with this letter. Those materials include hard copies of the documentation outlined below as well as a USB flash drive with soft copies of the same.

The flash drive is a SanDisk Ultra flash drive, serial number BN2406002390W. The flash drive is encrypted, and the password is "TruEEV2025". If preferable we can also provide the documentation via a secure virtual data room.

As noted in my prior letter, Trulieve utilizes SAP SuccessFactors as its human capital management system. All new employees are onboarded via the SuccessFactors platform. As also noted in my prior letter, in connection with the FDLE audit, it was discovered that during the initial implementation of the E-Verify requirements, there was an approximately 116-day period (July 1,2023 through October 24, 2023) where our SAP SuccessFactors system was not linked to the E-Verify system.

Tabs "A" through "Z" of the enclosed materials contains copies of the required I-9 forms and accompanying backup identification documentation for employees hired during the 116-day period. This documentation is also provided on the flash drive, where we have included separate PDF documents for each such employee in the folder labeled "4. Active Employee I-9 & Supporting Documents (Hire Dates July 1, 2023, through October 24, 2003."

For employees hired as of October 25, 2023, our SuccessFactors system was linked to the E-Verify system. Tab "E-VERIFY" of the enclosed materials provides a copy of an E-Verify report for the period October 25, 2023, through January 31, 2025. This report is also on the flash drive in the folder labeled "5. E-Verify Report (Active Employee Hire Dates October 25, 2023, through January 31, 2025)". PDF documents of copies of the required I-9 forms and accompanying backup identification documentation for each such employee are available. Due to the size of those files, we are not including copies but will work with the Department if copies are needed.

Finally, as also noted in my prior letter, all Trulieve employees are required to pass a level 2 background check as a condition of employment per 381.986(9), Florida Statutes. Documentation of such background checks, which are conducted by both the Florida Department of Law Enforcement as well as the Federal Bureau of Investigation, is submitted and reviewed by the Florida Department of Health. The DOH separately verifies the social security number of such employees with the FDLE.

Please let me know if you have any questions. I can be reached at (770) 330-0831. Again, we look forward to working with the Department to demonstrate our compliance with this important process.

Best regards,

Eric Powers
Chief Legal Officer

UNOFFICIAL DOCUMENT

Exhibit C

UNOFFICIAL DOCUMENT

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

TRULIEVE, INC., Plaintiff, v. NATHAN JUREWICZ, Defendant.	Case No. 2025-CA001071-CAAXES

DECLARATION OF EMMANUEL ADAMSON

I, Emmanuel Adamson, declare as follows:

1. I am over the age of 18 and competent to testify to the matters stated herein. I am not a party to this action. I am employed as a licensed Process Server, located at 5811 Jenny Dr, Tampa, Florida, 33617.

2. On Wednesday, April 23rd, 2025, a contact attempt was made at the address of 3053 Calvano Dr., Land O Lakes, Florida, 34639, where the subject was previously known to reside. Upon arrival, I was met by Jane Doe (approximately age 60, white, blonde hair, 5'.5", 120lbs.).

3. Jane Doe stated that the subject, Nathan Jurewicz, moved out of the house over one year ago. Doe stated that she did not have a new address for the subject.

4. Jane Doe further stated that though she knows the subject, Nathan Jurewicz, he "moved a while ago" and "they don't talk at all."

5. I then relayed my encounter to Counsel for Trulieve, and stated that by law, we cannot substitute this service unless the subject resides at the same address as listed on the Summons.

UNOFFICIAL DOCUMENT

6. On May 2nd, 2025, My employer performed a skip-trace analysis of the subject in order to identify any additional possible locations. One possible location was found: a business address of 4053 Gunn Hwy, Tampa, FL 33618.

7. The skip trace relayed that address to Counsel for Trulieve.

8. As of May 5th, 2025, no attempts to serve the subject, Nathan Jurewicz, have been successful on behalf of myself or my employer.

I declare under penalty of perjury under the laws of the United States of America and the State of Florida that the foregoing is true and correct.

Executed on May 7, 2025 in Tampa, Florida. "Emmanuel Adamson"

/s/ Emmanuel Adamson

Emmanuel Adamson

UNOFFICIAL DOCUMENT

CERTIFICATE OF SERVICE

I hereby cerify that a true and correct copy of the foregoing was filed using the Florida Courts E-Filing Portal on this 8th day of May, 2025, which will send notice to all counsel of record.

Date: May 8, 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

UNOFFICIAL DOCUMENT

Exhibit D

UNOFFICIAL DOCUMENT

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

TRULIEVE, INC., Plaintiff, v. NATHAN JUREWICZ, Defendant.	Case No. 2025-CA001071-CAAXES

AFFIDAVIT OF NICOLE PADRO

I, Nicole Padro, being duly sworn, depose and say as follows:

1. I am over the age of 18 and competent to testify to the matters stated below. I am employed as a licensed process server at Spotlight Legal Solutions LLC ("Spotlight"), located at 1910 East Palm Avenue, Tampa, Florida 33605. Spotlight was engaged by Meier Watkins Phillips Pusch LLP ("Meier Watkins") to serve the defendant in the above matter. I have personal knowledge of Spotlight's activities related to that engagement.

2. At or around the time of Spotlight's engagement, Meier Watkins provided skip trace search results to assist in locating the defendant. Meier Watkins also advised that another process server had already tried serving the defendant at the address indicated on the complaint, 30853 Calvano Drive, Land O Lakes, Florida, 34639.

3. Based on the skip trace search results provided by Meier Watkins and my office's own investigation, there appeared to be three additional addresses associated with the defendant:

a. 6911 Sheldon Rd, Suite B, Tampa, Florida 33615;

b. 4053 Gunn Hwy, Tampa, Florida 33618;

UNOFFICIAL DOCUMENT

c. 10406 Rechnata Ln. Tampa, Florida 33618

4. I attempted to locate and serve the defendant at each of the above locations.

5. On April 27, 2025, I attempted to locate the defendant at 6911 Sheldon Road, Suite B, Tampa, FL 33615, the address of a business (Indica Cafe). Our investigation had revealed that the defendant attended a regular meeting group there, however, I was unable to locate the defendant. Upon arrival, I spoke with a woman who identified herself as the cafe owner. She confirmed that the defendant had regularly visited the Indica Cafe but had stopped attending meetings there.

6. Later that same day, April 27, I attempted to locate the Defendant at 4053 Gunn Hwy, Tampa, Florida 33618, the address of a business (Action Lock & Safe) that is affiliated with the defendant's father and where the defendant's vehicle is registered. The vehicle was not present at this location, and I was unable to locate the defendant there.

7. Also on April 27, I attempted to locate the defendant at 10406 Rechnata Lane, Tampa, FL 33618, a residential address associated with the defendant's father. I was unable to locate the defendant.

8. The next day, April 28, I returned to Action Lock & Safe and spoke with an employee who stated that the business is owned by Ed Jurewicz, the defendant's father. I was told that Ed Jurewicz was not at the location, but that I could return the next day (April 29) to speak with Ed Jurewicz about the defendant's whereabouts.

9. The following day, April 29, I returned to Action Lock & Safe and spoke directly with a man who identified himself as the defendant's father, Ed Jurewicz. He called the defendant and spoke to him on speaker phone in my presence. During this conversation, Ed Jurewicz informed the defendant that he was being sued by Trulieve and that a process server was trying to

UNOFFICIAL DOCUMENT

serve him papers. The defendant responded that he does not intend to attend court and that he will actively avoid being served. After the call, Mr. Jurewicz advised that the defendant's living situation was unstable and transient, and he could not provide any information about the defendant's whereabouts or current residence.

10. Despite the defendant's clear and unequivocal statement of intent to avoid court and to evade service of process, we continued efforts to personally locate and serve the defendant. Those efforts are described on the Return of Service attached here as **Exhibit 1** and executed by my colleague, Gregory Scott, who is also a licensed process server.

11. Those efforts consisted of four attempts to serve the defendant at 3053 Calvano Dr., Land O Lakes, FL, a residential address associated with the defendant's mother. During one of those attempts, on May 27, 2025, Mr. Scott spoke with a woman who identified herself as the defendant's mother. She stated that the defendant did not live there and did not provide any information about the defendant's whereabouts.

12. In addition to the above-described attempts to personally serve the defendant, I have, since late April, regularly monitored the defendant's social media accounts in attempts to determine his activities and whereabouts. Based on the information provided by Meier Watkins and my office's investigation, the defendant appears to operate or feature 13 social media accounts,[1] all of which I have monitored almost daily since late April. I have also attempted to communicate with the defendant directly via Facebook and Instagram. Despite the defendant's

[1] https://linktree/ganjaleaks; https://x.com/ganjaleaks; https://www.instagram.com/ganjaleaks; https://www.threads.net/@ganjaleaks; https://www.patreon.com/GanjaLeaks; https://www.rend.t.com/user/ganjaleaks/; https://www.youtube.com/@ganjaleaks; https://www.linkedin.com/in/nathanjurewicz; https://www.instagram.com/wwdwood/; https://www.youtube.com/@natejurewicz5194; https://www.linkedin.com/in/nathanjurewicz/; https://www.instagram.com/changeyourlatewithnate/; https://www.facebook.com/jurewicznathan/; https://www.youtube.com/@natejurewicz5194.

UNOFFICIAL DOCUMENT

social media presence, his online activities have yielded no further information as to where he might regularly be found. For example, on June 9, I noticed that the defendant had stated online via Instagram that he was selling a safe at Action Lock and Safe. I contacted Action Lock & Safe and was told by an employee that the defendant was the not on the premises and is not an employee.

13. Based on all the information available to date, I believe that the defendant does not have a permanent address. I also believe that further efforts to serve the defendant will be futile given his stated intent to evade service and avoid going to court. In my experience as a process server, it is difficult or impossible to personally serve someone who refuses to accept delivery of service papers.

14. I understand that I am swearing or affirming under oath to the truthfulness of the claims made in this affidavit and that the punishment for knowingly making false statements under oath may include fines or imprisonment, or both.

FURTHER SAYETH THE AFFIANT NAUGHT.

UNOFFICIAL DOCUMENT

****

SIGNATURE PAGE FOLLOWS

Nicole Padro

Executed on 7/31/ 2025 in Tampa, Florida.

Subscribed and sworn to before me this 31 day of July 2025.

Personally Known__ OR Produced Identification ✓

Type of Identification Produced Florida Driver license

Dated: 7/31/ 2025

Notary Public (Commission Expires)

JESSY POSADAS
Notary Public
State of Florida
Comm# HH587095
Expires 11/4/2028

UNOFFICIAL DOCUMENT

Exhibit 1

To Padro Aff.

UNOFFICIAL DOCUMENT

RETURN OF SERVICE

State of Florida **County of Pa** **Circuit Court**

Case Number: 2025CA001071CAAXES

RSE2025002267

Plaintiff: **TRULIEVE, INC.**
vs.
Defendant: **NATHAN JUREWICZ**

For:
Shannon Timmann
MEIER WATKINS PHILLIPS PUSCH LLP
919 18th Street N.W.
Suite 650
Washington, DC 20006

Received by Gregory A. Scott on the 15th day of May, 2025 at 5:05 pm to be served on **Nathan Jurewicz, 3053 Calvano Dr., Land O Lakes, FL 34639**.

I, Gregory A. Scott, do hereby affirm that on the **27th day of May, 2025** at **6:20 pm, I:**

SUBSTITUTE served by delivering a true copy of the **Summons & Complaint and Demand for Jury Trial** with the date and hour of service endorsed thereon by me, to: **Debra Cunningham** as **Mother** at the address of: **3053 Calvano Dr., Land O Lakes, FL 34639**, the within named person's usual place of **Abode**, who resides therein, who is fifteen (15) years of age or older and informed said person of the contents therein, in compliance with state statutes.

Additional Information pertaining to this Service:
5/15/2025 8:49 pm Attempted service at 3053 Calvano Dr., Land O Lakes, FL 34639. No answer. FL tag IRHL77 in driveway.
5/17/2025 3:06 pm Attempted service at 3053 Calvano Dr., Land O Lakes, FL 34639. No answer. Same car in driveway. No movement inside.
5/22/2025 3:36 pm Attempted service at 3053 Calvano Dr., Land O Lakes, FL 34639. Housekeeper, Jody Smith (showed ID) states subject moved out a couple of months ago. He is not a resident and subject's mother just left. FL tags RMV262 and IRHL77 in driveway.
5/27/2025 6:20 pm Attempted service at 3053 Calvano Dr., Land O Lakes, FL 34639. Subjects mother states he does not reside here and doesn't know his current whereabouts. I advised her we had several source indicate that he did live here and that I was advised by the attorney to leave documents. She refused to take documents so they were left in front of her at the door.

Description of Person Served: Age: 65, Sex: F, Race/Skin Color: White, Height: 5'4", Weight: 140, Hair: Grey, Glasses: N

Under penalty of perjury, I declare that I have read the foregoing and the facts in it are true to the best of my knowledge. Pursuant to F.S. 92.525 (2) I have no interest in the above action.

Gregory A. Scott
PPS 9021

Spotlight Legal Solutions, LLC
1910 East Palm Ave.
8219
Tampa, FL 33604
(813) 232-5300

Our Job Serial Number: RSE-2025002267

Copyright © 1992-2025 DreamBuilt Software, Inc. - Process Server's Toolbox V9.0a

DELIVERED 5/27/2025 6:20 PM
SERVER GS
LICENSE PPS 9021

DIN: 6

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

Trulieve, Inc.
Plaintiff(s)/Petitioner(s)
-vs-
Nathan Jurewicz
Defendant(s)/Respondent(s)

Case: 2025CA001071CAAXES

Division: B

SUMMONS

THE STATE OF FLORIDA:
To Each Sheriff of the State:

YOU ARE HEREBY COMMANDED to serve this summons and a copy of the complaint or petition in this action on defendant:

Nathan Jurewicz
3053 Calvano Dr, Land O Lakes, FL 34639

Each defendant is required to serve written defenses to the complaint or petition on Shannon B. Timmann, plaintiff's attorney, whose address is 919 18th St, NW, Suite 650, Washington, DC 20006 or shannon.timmann@mwpp.com, within 20 days after service of this summons on that defendant, exclusive of the day of service, and to file the original defense with the Clerk and Comptroller of this Court either before service on plaintiff's attorney or immediately thereafter. If a defendant fails to do so, a default will be entered against that defendant for the relief demanded in the complaint or petition.

DATED on April 22, 2025

Office of Nikki Alvarez-Sowles, Esq.
Pasco County Clerk & Comptroller

Nikki Alvarez-Sowles
Pasco County Clerk & Comptroller
2025CA001071CAAXES 04-22-2025 12:56 PM
Deputy Clerk: Haley Jones

UNOFFICIAL DOCUMENT

Case: _____

FOR PROCEEDINGS BEFORE THE COURTS OF PASCO COUNTY

If you are a person with a disability who needs any accommodation in order to participate in this proceeding, you are entitled, at no cost to you, to the provision of certain assistance. Please contact either the Pasco County Customer Service Center, 8731 Citizens Drive, New Port Richey, FL 34654, (727) 847-2411 (V) or the Pasco County Risk Management Office, 7536 State Street, New Port Richey, FL 34654, (727) 847-8028 (V) at least 7 days before your scheduled court appearance, or immediately upon receiving this notification if the time before the scheduled appearance is less than 7 days; if you are hearing or voice impaired, call 711.

IMPORTANTE

Usted ha sido demandado legalmente. Tiene veinte (20) dias, contados a partir del recibo de esta notificacion, para contestar la demanda adjunta, por escrito, y presentarla ante este tribunal. Una llamada telefonica no lo protegera. Si usted desea que el tribunal considere su defensa, debe presentar su respuesta por escrito, incluyendo el numero del caso y los nombres de las partes interesadas. Si usted no contesta la demanda a tiempo, pudiese perder el caso y podria ser despojado de sus ingresos y propiedades, o privado de sus derechos, sin previo aviso del tribunal. Existen otros requisitos legales. Si lo desea, usted puede consultar a un abogado inmediatamente. Si no conoce a un abogado, puede llamar a una de las oficinas de asistencia legal que aparecen en la guia telefonica.

Si desea responder a la demanda por su cuenta, al mismo tiempo en que presenta su respuesta ante el tribunal, debera usted enviar por correo o entregar una copia de su respuesta a la persona denominada abajo como "Plaintiff/Plaintiff's Attorney" (Demandante o Abogado del Demandante)..

IMPORTANT

Des poursuites judiciaries ont ete entreprises contre vous. Vous avez 20 jours consecu-tifs a partir de la date de l'assignation de cette citation pour deposer une response ecrite a la plainte ci-jointe aupres de ce tribunal. Un simple coup de telephone est insuffisant pour vous proteger. Vous etes obliges de deposer votre reponse ecrite, avec mention du numero de dossier ci-dessus et du nom des parties nommees ici, si vous souhaitez que le tribunal entende votre cause. Si vous ne deposez pas votre reponse ecrite dans le relai requis, vous risquez de perdre la cause ainsi que votre salaire, votre argent, et vos biens peuvent etre saisis par la suite, sans aucun preavis ulterieur du tribunal. Il y a d'autres obligations juridiques et vous pouvez requerir les services immediats d'un avocat. Si vous ne connaissez pas d'avocat, vous pourriez telephoner a un service de reference d'avocats ou a un bureau d'assistance juridique (figurant a l'annuaire de telephones).

Si vous choisissez de deposer vous-meme une reponse ecrite, il vous faudra egale-ment, en meme temps que cette formalite, faire parvenir ou expedier une copie de votre reponse ecrite au "Plaintiff/Plaintiff's Attorney" (Plaignant ou a son avocet) nomme ci-dessous.

UNOFFICIAL DOCUMENT

Exhibit E

UNOFFICIAL DOCUMENT

MWPP
MEIER
WATKINS
PHILLIPS
PUSCH

Shannon Timmann
shannon.timmann@mwpp.com
+1 (850) 322-8251

June 10, 2025

Via Registered Mail

Florida Department of State
Division of Corporations
P.O. Box 6327
Tallahassee, Florida 32314

Re: Trulieve, Inc. v. Nathan Jurewicz, Case No. 2025CA001071CAAXES, Circuit Court of the Sixth Judicial Circuit in and for Pasco County, Florida

To Whom it May Concern:

I am writing to effectuate substituted service on the defendant in the above-captioned matter pursuant to Fla. Stat. 48.161. The defendant is a Florida resident who has concealed his whereabouts and evaded personal service despite diligent attempts at the same. Accordingly, to effectuate substituted service, I have enclosed the (1) complaint and (2) court-issued summons. I am happy to receive the acceptance of service at the physical address below or by email at Shannon.timmann@mwpp.com

Thank you for your assistance.

Kind regards,

Shannon Timmann

UNOFFICIAL DOCUMENT

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

Trulieve, Inc.
Plaintiff(s)/Petitioner(s)
-VS-
Nathan Jurewicz
Defendant(s)/Respondent(s)

Case: 2025CA001071CAAXES

Division: B

SUMMONS

THE STATE OF FLORIDA:
To Each Sheriff of the State:

YOU ARE HEREBY COMMANDED to serve this summons and a copy of the complaint or petition in this action on defendant:

Nathan Jurewicz
3053 Calvano Dr, Land O Lakes, FL 34639

Each defendant is required to serve written defenses to the complaint or petition on Shannon B. Timmann, plaintiff's attorney, whose address is 919 18th St, NW, Suite 650, Washington, DC 20006 or shannon.timmann@mwpp.com, within 20 days after service of this summons on that defendant, exclusive of the day of service, and to file the original defense with the Clerk and Comptroller of this Court either before service on plaintiff's attorney or immediately thereafter. If a defendant fails to do so, a default will be entered against that defendant for the relief demanded in the complaint or petition.

DATED on April 22, 2025

Office of Nikki Alvarez-Sowles, Esq.
Pasco County Clerk & Comptroller

Nikki Alvarez-Sowles
Pasco County Clerk & Comptroller

UNOFFICIAL DOCUMENT

Case: _____

FOR PROCEEDINGS BEFORE THE COURTS OF PASCO COUNTY

If you are a person with a disability who needs any accommodation in order to participate in this proceeding, you are entitled, at no cost to you, to the provision of certain assistance. Please contact either the Pasco County Customer Service Center, 8731 Citizens Drive, New Port Richey, FL 34654, (727) 847-2411 (V) or the Pasco County Risk Management Office, 7536 State Street, New Port Richey, FL 34654, (727) 847-8028 (V) at least 7 days before your scheduled court appearance, or immediately upon receiving this notification if the time before the scheduled appearance is less than 7 days; if you are hearing or voice impaired, call 711.

IMPORTANTE

Usted ha sido demandado legalmente. Tiene veinte (20) dias, contados a partir del recibo de esta notificacion, para contestar la demanda adjunta, por escrito, y presentarla ante este tribunal. Una llamada telefonica no lo protegera. Si usted desea que el tribunal considere su defensa, debe presentar su respuesta por escrito, incluyendo el numero del caso y los nombres de las partes interesadas. Si usted no contesta la demanda a tiempo, pudiese perder el caso y podria ser despojado de sus ingresos y propiedades, o privado de sus derechos, sin previo aviso del tribunal. Existen otros requisitos legales. Si lo desea, usted puede consultar a un abogado inmediatamente. Si no conoce a un abogado, puede llamar a una de las oficinas de asistencia legal que aparecen en la guia telefonica.

Si desea responder a la demanda por su cuenta, al mismo tiempo en que presenta su respuesta ante el tribunal, debera usted enviar por correo o entregar una copia de su respuesta a la persona denominada abajo como "Plaintiff/Plaintiff's Attorney" (Demandante o Abogado del Demandante)..

IMPORTANT

Des poursuites judiciaries ont ete entreprises contre vous. Vous avez 20 jours consecu-tifs a partir de la date de l'assignation de cette citation pour deposer une response ecrite a la plainte ci-jointe aupres de ce tribunal. Un simple coup de telephone est insuffisant pour vous proteger. Vous etes obliges de deposer votre reponse ecrite, avec mention du numero de dossier ci-dessus et du nom des parties nommees ici, si vous souhaitez que le tribunal entende votre cause. Si vous ne deposez pas votre reponse ecrite dans le relai requis, vous risquez de perdre la cause ainsi que votre salaire, votre argent, et vos biens peuvent etre saisis par la suite, sans aucun preavis ulterieur du tribunal. Il y a d'autres obligations juridiques et vous pouvez requerir les services immediats d'un avocat. Si vous ne connaissez pas d'avocat, vous pourriez telephoner a un service de reference d'avocats ou a un bureau d'assistance juridique (figurant a l'annuaire de telephones).

Si vous choisissez de deposer vous-meme une reponse ecrite, il vous faudra egale-ment, en meme temps que cette formalite, faire parvenir ou expedier une copie de votre reponse ecrite au "Plaintiff/Plaintiff's Attorney" (Plaignant ou a son avocet) nomme ci-dessous.

UNOFFICIAL DOCUMENT

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

Trulieve, Inc.
Plaintiff(s)/Petitioner(s)
-VS-
Nathan Jurewicz
Defendant(s)/Respondent(s)

Case: 2025CA001071CAAXES

Division: B

SUMMONS

THE STATE OF FLORIDA:
To Each Sheriff of the State:

YOU ARE HEREBY COMMANDED to serve this summons and a copy of the complaint or petition in this action on defendant:

Nathan Jurewicz
3053 Calvano Dr, Land O Lakes, FL 34639

Each defendant is required to serve written defenses to the complaint or petition on Shannon B. Timmann, plaintiff's attorney, whose address is 919 18th St, NW, Suite 650, Washington, DC 20006 or shannon.timmann@mwop.com, within 20 days after service of this summons on that defendant, exclusive of the day of service, and to file the original defense with the Clerk and Comptroller of this Court either before service on plaintiff's attorney or immediately thereafter. If a defendant fails to do so, a default will be entered against that defendant for the relief demanded in the complaint or petition.

DATED on April 22, 2025

Office of Nikki Alvarez-Sowles, Esq.
Pasco County Clerk & Comptroller

Nikki Alvarez-Sowles
Pasco County Clerk & Comptroller

UNOFFICIAL DOCUMENT

Case: _____

FOR PROCEEDINGS BEFORE THE COURTS OF PASCO COUNTY

If you are a person with a disability who needs any accommodation in order to participate in this proceeding, you are entitled, at no cost to you, to the provision of certain assistance. Please contact either the Pasco County Customer Service Center, 8731 Citizens Drive, New Port Richey, FL 34654, (727) 847-2411 (V) or the Pasco County Risk Management Office, 7536 State Street, New Port Richey, FL 34654, (727) 847-8028 (V) at least 7 days before your scheduled court appearance, or immediately upon receiving this notification if the time before the scheduled appearance is less than 7 days; if you are hearing or voice impaired, call 711.

IMPORTANTE

Usted ha sido demandado legalmente. Tiene veinte (20) dias, contados a partir del recibo de esta notificacion, para contestar la demanda adjunta, por escrito, y presentarla ante este tribunal. Una llamada telefonica no lo protegera. Si usted desea que el tribunal considere su defensa, debe presentar su respuesta por escrito, incluyendo el numero del caso y los nombres de las partes interesadas. Si usted no contesta la demanda a tiempo, pudiese perder el caso y podria ser despojado de sus ingresos y propiedades, o privado de sus derechos, sin previo aviso del tribunal. Existen otros requisitos legales. Si lo desea, usted puede consultar a un abogado inmediatamente. Si no conoce a un abogado, puede llamar a una de las oficinas de asistencia legal que aparecen en la guia telefonica.

Si desea responder a la demanda por su cuenta, al mismo tiempo en que presenta su respuesta ante el tribunal, debera usted enviar por correo o entregar una copia de su respuesta a la persona denominada abajo como "Plaintiff/Plaintiff's Attorney" (Demandante o Abogado del Demandante)..

IMPORTANT

Des poursuites judiciaries ont ete entreprises contre vous. Vous avez 20 jours consecu-tifs a partir de la date de l'assignation de cette citation pour deposer une response ecrite a la plainte ci-jointe aupres de ce tribunal. Un simple coup de telephone est insuffisant pour vous proteger. Vous etes obliges de deposer votre reponse ecrite, avec mention du numero de dossier ci-dessus et du nom des parties nommees ici, si vous souhaitez que le tribunal entende votre cause. Si vous ne deposez pas votre reponse ecrite dans le relai requis, vous risquez de perdre la cause ainsi que votre salaire, votre argent, et vos biens peuvent etre saisis par la suite, sans aucun preavis ulterieur du tribunal. Il y a d'autres obligations juridiques et vous pouvez requerir les services immediats d'un avocat. Si vous ne connaissez pas d'avocat, vous pourriez telephoner a un service de reference d'avocats ou a un bureau d'assistance juridique (figurant a l'annuaire de telephones).

Si vous choisissez de deposer vous-meme une reponse ecrite, il vous faudra egale-ment, en meme temps que cette formalite, faire parvenir ou expedier une copie de votre reponse ecrite au "Plaintiff/Plaintiff's Attorney" (Plaignant ou a son avocet) nomme ci-dessous.

UNOFFICIAL DOCUMENT

Filing # 220763177 E-Filed 04/10/2025 03:02:42 PM

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/.

UNOFFICIAL DOCUMENT

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

UNOFFICIAL DOCUMENT

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/C4oL1GvRm7Y/.
[3] Ganjaleaks, Instagram (Sept. 15, 2024), https://www.instagram.com/p/C_8nRIGvtC3/.
[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.

UNOFFICIAL DOCUMENT

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

[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/.

UNOFFICIAL DOCUMENT

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

UNOFFICIAL DOCUMENT

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

UNOFFICIAL DOCUMENT

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

UNOFFICIAL DOCUMENT

UNOFFICIAL
DOCUMENT

Filing # 220763177 E-Filed 04/10/2025 03:02:42 PM

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://thephysicians.com/what-is-trulieve/.

UNOFFICIAL DOCUMENT

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

UNOFFICIAL DOCUMENT

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]

UNOFFICIAL DOCUMENT

[2] Ganjaleaks, Instagram (March 17, 2024), https://www.instagram.com/p/C4oL1GvRm7Y/.
[3] Ganjaleaks, Instagram (Sept. 15, 2024), https://www.instagram.com/p/C_8nRIGvtC3/.
[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.

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

[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/.

UNOFFICIAL DOCUMENT

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

UNOFFICIAL DOCUMENT

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

UNOFFICIAL DOCUMENT

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

UNOFFICIAL DOCUMENT

UNOFFICIAL
DOCUMENT

Exhibit F

UNOFFICIAL DOCUMENT

FLORIDA DEPARTMENT OF STATE

Division of Corporations

July 2, 2025

SHANNON B. TIMMANN

Pursuant to Chapter 48.161 Florida Statutes, substitute service of process was accepted for NATHAN JUREWICZ in case number 2025CA001071CAAXES and was filed on June 23, 2025 at 4:00 PM.

Plaintiff(s)
TRULIEVE, INC.,
v.
Defendant(s)
NATHAN JUREWICZ

The Secretary of State does not forward documentation to the defendant. All inquiries on behalf of this defendant should be made to the attorneys involved.

Tanner J. Turnmire
Processor of Service

Division of Corporations
P.O. Box 6327, Tallahassee, Florida 32314

Letter No. 250702057SOP.01

UNOFFICIAL DOCUMENT

Exhibit G

UNOFFICIAL DOCUMENT

Subject: Submission #250702057SOP Processed - Online Service of Process [sunbiz.org]
Date: Friday, July 18, 2025 at 9:19:42 AM Eastern Daylight Time
From: onlinesop@dos.myflorida.com
To: Devin Bolger
Attachments: responseletter.pdf

Submission Processed

The substitute service of process submission for case number **2025CA001071CAAXES** has been processed. Attached, please find your response letter(s).

Details

Tracking #	250702057SOP
Case #	2025CA001071CAAXES
Parties	TRULIEVE, INC., v. NATHAN JUREWICZ
Service Requested For	NATHAN JUREWICZ
Contact	SHANNON B. TIMMANN (shannon.timmann@mwpp.com)
Submitter	Tanner J. Turnmire
Submission Date	6/23/2025 4:00 PM

UNOFFICIAL DOCUMENT

Note: The Division of Corporations does not serve defendants! It is the responsibility of the plaintiffs attorney to notify defendants of accepted Substitute Service of Process.

If you have questions *about this submission*, you may contact this office at ApostillesCertsCorpHelp@dos.myflorida.com. Please reference your tracking number **250702057SOP**. All other inquiries must be directed to the attorney(s) involved.

Online Service of Process

Florida Department of State, Division of Corporations
https://online-sop.sunbiz.org

Email sent to devin.bolger@mwpp.com.
Do not reply. This email address is not monitored.

UNOFFICIAL DOCUMENT

Exhibit H

UNOFFICIAL DOCUMENT

Subject: Trulieve v. Jurewicz, Case No. 2025CA001071CAAXES
Date: Friday, July 18, 2025 at 3:51:16 PM Eastern Daylight Time
From: Shannon Timmann <shannon.timmann@mwpp.com>
To: shortsalenow@gmail.com <shortsalenow@gmail.com>, njurewicz@gmail.com <njurewicz@gmail.com>
CC: Megan Meier <megan.meier@mwpp.com>, Devin Bolger <devin.bolger@mwpp.com>
Priority: High
Attachments: image001.png, 20250718 Package to N. Jurewicz[50].pdf

Mr. Jurewicz,

Please see the attached notice regarding service of Trulieve's defamation action against you and confirm receipt of the same.

Regards,

Shannon

Shannon B. Timmann, Counsel
MEIER WATKINS PHILLIPS PUSCH
919 18th Street NW, Suite 650
Washington, DC 20006
Direct: +1 (850) 322-8251
Website | Bio

MWPP MEIER WATKINS PHILLIPS PUSCH

Chambers TOP RANKED High Net Worth 2024 Meier Watkins Phillips Pusch LLP

UNOFFICIAL DOCUMENT

MEIER WATKINS PHILLIPS PUSCH

Shannon Timmann
shannon.timmann@mwpp.com
+1 (850) 322-8251

July 18, 2025

Via Registered Mail & Email

Nathan Jurewicz
3053 Calvano Dr.
Land O Lakes, FL 34639
Email: shortsalenow@gmail.com
Email: njurewicz@gmail.com

Re: NOTICE OF SERVICE OF PROCESS PURSUANT TO FLA. STAT. 48.161

Trulieve, Inc. v. Nathan Jurewicz, Case No. 2025CA001071CAAXES, Circuit Court of the Sixth Judicial Circuit in and for Pasco County, Florida

UNOFFICIAL DOCUMENT

Mr. Jurewicz:

I am writing to provide notice of service and a copy of process related to the above lawsuit pursuant to Fla. Stat. 48.161. We have attempted to make personal service on you, however, despite several efforts in multiple locations, we have been unsuccessful. Further, we have learned that you are concealing your whereabouts and intend to evade service. Accordingly, we have made substituted service on the Florida Secretary of State pursuant to Fla. Stat. 48.161. The Florida Secretary of State accepted service of process on your behalf on June 23, 2025, and our office received notice of the same on the date of this letter, July 18. I am enclosing notice of acceptance of service alongside a copy of the process sent to the Florida Secretary of State and additional copies of the complaint and court-issued summons. This letter constitutes notice of process.

Please forward this correspondence to your attorney if you have one. You or your attorney should feel free to contact me by email at shannon.timmann@mwpp.com to schedule a time to discuss this matter.

Kind regards,

Shannon Timmann

Enclosures

UNOFFICIAL DOCUMENT

Enclosure 1
Trulieve Complaint
v. Nathan Jurewicz
April 10, 2025

UNOFFICIAL DOCUMENT

Filing # 220763177 E-Filed 04/10/2025 03:02:42 PM

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/.

UNOFFICIAL DOCUMENT

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

UNOFFICIAL DOCUMENT

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]

UNOFFICIAL DOCUMENT

[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.

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

[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/.

UNOFFICIAL DOCUMENT

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

UNOFFICIAL DOCUMENT

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

UNOFFICIAL DOCUMENT

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

UNOFFICIAL DOCUMENT

Enclosure • •••
Summons to
Nathan Jurewicz
April 27, 2025

UNOFFICIAL DOCUMENT

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

Trulieve, Inc.
Plaintiff(s)/Petitioner(s)
-vs-
Nathan Jurewicz
Defendant(s)/Respondent(s)

Case: 2025CA001071CAAXES

Division: B

SUMMONS

THE STATE OF FLORIDA:
To Each Sheriff of the State:

YOU ARE HEREBY COMMANDED to serve this summons and a copy of the complaint or petition in this action on defendant:

Nathan Jurewicz
3053 Calvano Dr, Land O Lakes, FL 34639

Each defendant is required to serve written defenses to the complaint or petition on Shannon B. Timmann, plaintiff's attorney, whose address is 919 18th St, NW, Suite 650, Washington, DC 20006 or shannon.timmann@mwpp.com, within 20 days after service of this summons on that defendant, exclusive of the day of service, and to file the original defense with the Clerk and Comptroller of this Court either before service on plaintiff's attorney or immediately thereafter. If a defendant fails to do so, a default will be entered against that defendant for the relief demanded in the complaint or petition.

DATED on April 22, 2025

Office of Nikki Alvarez-Sowles, Esq.
Pasco County Clerk & Comptroller

Nikki Alvarez-Sowles
Pasco County Clerk & Comptroller
2025CA001071CAAXES 04-22-2025 12:56 PM
Deputy Clerk: Haley Jones

UNOFFICIAL DOCUMENT

Case: _____

FOR PROCEEDINGS BEFORE THE COURTS OF PASCO COUNTY

If you are a person with a disability who needs any accommodation in order to participate in this proceeding, you are entitled, at no cost to you, to the provision of certain assistance. Please contact either the Pasco County Customer Service Center, 8731 Citizens Drive, New Port Richey, FL 34654, (727) 847-2411 (V) or the Pasco County Risk Management Office, 7536 State Street, New Port Richey, FL 34654, (727) 847-8028 (V) at least 7 days before your scheduled court appearance, or immediately upon receiving this notification if the time before the scheduled appearance is less than 7 days; if you are hearing or voice impaired, call 711.

IMPORTANTE

Usted ha sido demandado legalmente. Tiene veinte (20) dias, contados a partir del recibo de esta notificacion, para contestar la demanda adjunta, por escrito, y presentarla ante este tribunal. Una llamada telefonica no lo protegera. Si usted desea que el tribunal considere su defensa, debe presentar su respuesta por escrito, incluyendo el numero del caso y los nombres de las partes interesadas. Si usted no contesta la demanda a tiempo, pudiese perder el caso y podria ser despojado de sus ingresos y propiedades, o privado de sus derechos, sin previo aviso del tribunal. Existen otros requisitos legales. Si lo desea, usted puede consultar a un abogado inmediatamente. Si no conoce a un abogado, puede llamar a una de las oficinas de asistencia legal que aparecen en la guia telefonica.

Si desea responder a la demanda por su cuenta, al mismo tiempo en que presenta su respuesta ante el tribunal, debera usted enviar por correo o entregar una copia de su respuesta a la persona denominada abajo como "Plaintiff/Plaintiff's Attorney" (Demandante o Abogado del Demandante)..

IMPORTANT

Des poursuites judiciaries ont ete entreprises contre vous. Vous avez 20 jours consecu-tifs a partir de la date de l'assignation de cette citation pour deposer une response ecrite a la plainte ci-jointe aupres de ce tribunal. Un simple coup de telephone est insuffisant pour vous proteger. Vous etes obliges de deposer votre reponse ecrite, avec mention du numero de dossier ci-dessus et du nom des parties nommees ici, si vous souhaitez que le tribunal entende votre cause. Si vous ne deposez pas votre reponse ecrite dans le relai requis, vous risquez de perdre la cause ainsi que votre salaire, votre argent, et vos biens peuvent etre saisis par la suite, sans aucun preavis ulterieur du tribunal. Il y a d'autres obligations juridiques et vous pouvez requerir les services immediats d'un avocat. Si vous ne connaissez pas d'avocat, vous pourriez telephoner a un service de reference d'avocats ou a un bureau d'assistance juridique (figurant a l'annuaire de telephones).

Si vous choisissez de deposer vous-meme une reponse ecrite, il vous faudra egale-ment, en meme temps que cette formalite, faire parvenir ou expedier une copie de votre reponse ecrite au "Plaintiff/Plaintiff's Attorney" (Plaignant ou a son avocet) nomme ci-dessous.

UNOFFICIAL DOCUMENT

Case: _____

FOR PROCEEDINGS BEFORE THE COURTS OF PASCO COUNTY

If you are a person with a disability who needs any accommodation in order to participate in this proceeding, you are entitled, at no cost to you, to the provision of certain assistance. Please contact either the Pasco County Customer Service Center, 8731 Citizens Drive, New Port Richey, FL 34654, (727) 847-2411 (V) or the Pasco County Risk Management Office, 7536 State Street, New Port Richey, FL 34654, (727) 847-8028 (V) at least 7 days before your scheduled court appearance, or immediately upon receiving this notification if the time before the scheduled appearance is less than 7 days; if you are hearing or voice impaired, call 711.

IMPORTANTE

Usted ha sido demandado legalmente. Tiene veinte (20) dias, contados a partir del recibo de esta notificacion, para contestar la demanda adjunta, por escrito, y presentarla ante este tribunal. Una llamada telefonica no lo protegera. Si usted desea que el tribunal considere su defensa, debe presentar su respuesta por escrito, incluyendo el numero del caso y los nombres de las partes interesadas. Si usted no contesta la demanda a tiempo, pudiese perder el caso y podria ser despojado de sus ingresos y propiedades, o privado de sus derechos, sin previo aviso del tribunal. Existen otros requisitos legales. Si lo desea, usted puede consultar a un abogado inmediatamente. Si no conoce a un abogado, puede llamar a una de las oficinas de asistencia legal que aparecen en la guia telefonica.

Si desea responder a la demanda por su cuenta, al mismo tiempo en que presenta su respuesta ante el tribunal, debera usted enviar por correo o entregar una copia de su respuesta a la persona denominada abajo como "Plaintiff/Plaintiff's Attorney" (Demandante o Abogado del Demandante)..

IMPORTANT

Des poursuites judiciaries ont ete entreprises contre vous. Vous avez 20 jours consecu-tifs a partir de la date de l'assignation de cette citation pour deposer une response ecrite a la plainte ci-jointe aupres de ce tribunal. Un simple coup de telephone est insuffisant pour vous proteger. Vous etes obliges de deposer votre reponse ecrite, avec mention du numero de dossier ci-dessus et du nom des parties nommees ici, si vous souhaitez que le tribunal entende votre cause. Si vous ne deposez pas votre reponse ecrite dans le relai requis, vous risquez de perdre la cause ainsi que votre salaire, votre argent, et vos biens peuvent etre saisis par la suite, sans aucun preavis ulterieur du tribunal. Il y a d'autres obligations juridiques et vous pouvez requerir les services immediats d'un avocat. Si vous ne connaissez pas d'avocat, vous pourriez telephoner a un service de reference d'avocats ou a un bureau d'assistance juridique (figurant a l'annuaire de telephones).

Si vous choisissez de deposer vous-meme une reponse ecrite, il vous faudra egale-ment, en meme temps que cette formalite, faire parvenir ou expedier une copie de votre reponse ecrite au "Plaintiff/Plaintiff's Attorney" (Plaignant ou a son avocet) nomme ci-dessous.

UNOFFICIAL DOCUMENT

Enclosure 3
Documents sent to Florida Secretary of State
June 10, 2025

UNOFFICIAL DOCUMENT

MWPP
MEIER
WATKINS
PHILLIPS
PUSCH

Shannon Timmann
shannon.timmann@mwpp.com
+1 (850) 322-8251

June 10, 2025

Via Registered Mail

Florida Department of State
Division of Corporations
P.O. Box 6327
Tallahassee, Florida 32314

Re: Trulieve, Inc. v. Nathan Jurewicz, Case No. 2025CA001071CAAXES, Circuit Court of the Sixth Judicial Circuit in and for Pasco County, Florida

To Whom it May Concern:

I am writing to effectuate substituted service on the defendant in the above-captioned matter pursuant to Fla. Stat. 48.161. The defendant is a Florida resident who has concealed his whereabouts and evaded personal service despite diligent attempts at the same. Accordingly, to effectuate substituted service, I have enclosed the (1) complaint and (2) court-issued summons. I am happy to receive the acceptance of service at the physical address below or by email at Shannon.timmann@mwpp.com

Thank you for your assistance.

Kind regards,

Shannon Timmann

UNOFFICIAL DOCUMENT

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

Trulieve, Inc.
Plaintiff(s)/Petitioner(s)
-VS-
Nathan Jurewicz
Defendant(s)/Respondent(s)

Case: 2025CA001071CAAXES

Division: B

SUMMONS

THE STATE OF FLORIDA:
To Each Sheriff of the State:

YOU ARE HEREBY COMMANDED to serve this summons and a copy of the complaint or petition in this action on defendant:

Nathan Jurewicz
3053 Calvano Dr, Land O Lakes, FL 34639

Each defendant is required to serve written defenses to the complaint or petition on Shannon B. Timmann, plaintiff's attorney, whose address is 919 18th St, NW, Suite 650, Washington, DC 20006 or shannon.timmann@mwpp.com, within 20 days after service of this summons on that defendant, exclusive of the day of service, and to file the original defense with the Clerk and Comptroller of this Court either before service on plaintiff's attorney or immediately thereafter. If a defendant fails to do so, a default will be entered against that defendant for the relief demanded in the complaint or petition.

DATED on April 22, 2025

Office of Nikki Alvarez-Sowles, Esq.
Pasco County Clerk & Comptroller

Nikki Alvarez-Sowles
Pasco County Clerk & Comptroller

UNOFFICIAL DOCUMENT

Case: _____

FOR PROCEEDINGS BEFORE THE COURTS OF PASCO COUNTY

If you are a person with a disability who needs any accommodation in order to participate in this proceeding, you are entitled, at no cost to you, to the provision of certain assistance. Please contact either the Pasco County Customer Service Center, 8731 Citizens Drive, New Port Richey, FL 34654, (727) 847-2411 (V) or the Pasco County Risk Management Office, 7536 State Street, New Port Richey, FL 34654, (727) 847-8028 (V) at least 7 days before your scheduled court appearance, or immediately upon receiving this notification if the time before the scheduled appearance is less than 7 days; if you are hearing or voice impaired, call 711.

IMPORTANTE

Usted ha sido demandado legalmente. Tiene veinte (20) dias, contados a partir del recibo de esta notificacion, para contestar la demanda adjunta, por escrito, y presentarla ante este tribunal. Una llamada telefonica no lo protegera. Si usted desea que el tribunal considere su defensa, debe presentar su respuesta por escrito, incluyendo el numero del caso y los nombres de las partes interesadas. Si usted no contesta la demanda a tiempo, pudiese perder el caso y podria ser despojado de sus ingresos y propiedades, o privado de sus derechos, sin previo aviso del tribunal. Existen otros requisitos legales. Si lo desea, usted puede consultar a un abogado inmediatamente. Si no conoce a un abogado, puede llamar a una de las oficinas de asistencia legal que aparecen en la guia telefonica.

Si desea responder a la demanda por su cuenta, al mismo tiempo en que presenta su respuesta ante el tribunal, debera usted enviar por correo o entregar una copia de su respuesta a la persona denominada abajo como "Plaintiff/Plaintiff's Attorney" (Demandante o Abogado del Demandante)..

IMPORTANT

Des poursuites judiciaries ont ete entreprises contre vous. Vous avez 20 jours consecu-tifs a partir de la date de l'assignation de cette citation pour deposer une response ecrite a la plainte ci-jointe aupres de ce tribunal. Un simple coup de telephone est insuffisant pour vous proteger. Vous etes obliges de deposer votre reponse ecrite, avec mention du numero de dossier ci-dessus et du nom des parties nommees ici, si vous souhaitez que le tribunal entende votre cause. Si vous ne deposez pas votre reponse ecrite dans le relai requis, vous risquez de perdre la cause ainsi que votre salaire, votre argent, et vos biens peuvent etre saisis par la suite, sans aucun preavis ulterieur du tribunal. Il y a d'autres obligations juridiques et vous pouvez requerir les services immediats d'un avocat. Si vous ne connaissez pas d'avocat, vous pourriez telephoner a un service de reference d'avocats ou a un bureau d'assistance juridique (figurant a l'annuaire de telephones).

Si vous choisissez de deposer vous-meme une reponse ecrite, il vous faudra egale-ment, en meme temps que cette formalite, faire parvenir ou expedier une copie de votre reponse ecrite au "Plaintiff/Plaintiff's Attorney" (Plaignant ou a son avocet) nomme ci-dessous.

UNOFFICIAL DOCUMENT

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

Trulieve, Inc.
Plaintiff(s)/Petitioner(s)
-VS-
Nathan Jurewicz
Defendant(s)/Respondent(s)

Case: 2025CA001071CAAXES

Division: B

SUMMONS

THE STATE OF FLORIDA:
To Each Sheriff of the State:

YOU ARE HEREBY COMMANDED to serve this summons and a copy of the complaint or petition in this action on defendant:

Nathan Jurewicz
3053 Calvano Dr, Land O Lakes, FL 34639

Each defendant is required to serve written defenses to the complaint or petition on Shannon B. Timmann, plaintiff's attorney, whose address is 919 18th St, NW, Suite 650, Washington, DC 20006 or shannon.timmann@mwop.com, within 20 days after service of this summons on that defendant, exclusive of the day of service, and to file the original defense with the Clerk and Comptroller of this Court either before service on plaintiff's attorney or immediately thereafter. If a defendant fails to do so, a default will be entered against that defendant for the relief demanded in the complaint or petition.

DATED on April 22, 2025

Office of Nikki Alvarez-Sowles, Esq.
Pasco County Clerk & Comptroller

Nikki Alvarez-Sowles
Pasco County Clerk & Comptroller

UNOFFICIAL DOCUMENT

Case: _____

FOR PROCEEDINGS BEFORE THE COURTS OF PASCO COUNTY

If you are a person with a disability who needs any accommodation in order to participate in this proceeding, you are entitled, at no cost to you, to the provision of certain assistance. Please contact either the Pasco County Customer Service Center, 8731 Citizens Drive, New Port Richey, FL 34654, (727) 847-2411 (V) or the Pasco County Risk Management Office, 7536 State Street, New Port Richey, FL 34654, (727) 847-8028 (V) at least 7 days before your scheduled court appearance, or immediately upon receiving this notification if the time before the scheduled appearance is less than 7 days; if you are hearing or voice impaired, call 711.

IMPORTANTE

Usted ha sido demandado legalmente. Tiene veinte (20) dias, contados a partir del recibo de esta notificacion, para contestar la demanda adjunta, por escrito, y presentarla ante este tribunal. Una llamada telefonica no lo protegera. Si usted desea que el tribunal considere su defensa, debe presentar su respuesta por escrito, incluyendo el numero del caso y los nombres de las partes interesadas. Si usted no contesta la demanda a tiempo, pudiese perder el caso y podria ser despojado de sus ingresos y propiedades, o privado de sus derechos, sin previo aviso del tribunal. Existen otros requisitos legales. Si lo desea, usted puede consultar a un abogado inmediatamente. Si no conoce a un abogado, puede llamar a una de las oficinas de asistencia legal que aparecen en la guia telefonica.

Si desea responder a la demanda por su cuenta, al mismo tiempo en que presenta su respuesta ante el tribunal, debera usted enviar por correo o entregar una copia de su respuesta a la persona denominada abajo como "Plaintiff/Plaintiff's Attorney" (Demandante o Abogado del Demandante)..

IMPORTANT

Des poursuites judiciaries ont ete entreprises contre vous. Vous avez 20 jours consecu-tifs a partir de la date de l'assignation de cette citation pour deposer une response ecrite a la plainte ci-jointe aupres de ce tribunal. Un simple coup de telephone est insuffisant pour vous proteger. Vous etes obliges de deposer votre reponse ecrite, avec mention du numero de dossier ci-dessus et du nom des parties nommees ici, si vous souhaitez que le tribunal entende votre cause. Si vous ne deposez pas votre reponse ecrite dans le relai requis, vous risquez de perdre la cause ainsi que votre salaire, votre argent, et vos biens peuvent etre saisis par la suite, sans aucun preavis ulterieur du tribunal. Il y a d'autres obligations juridiques et vous pouvez requerir les services immediats d'un avocat. Si vous ne connaissez pas d'avocat, vous pourriez telephoner a un service de reference d'avocats ou a un bureau d'assistance juridique (figurant a l'annuaire de telephones).

Si vous choisissez de deposer vous-meme une reponse ecrite, il vous faudra egale-ment, en meme temps que cette formalite, faire parvenir ou expedier une copie de votre reponse ecrite au "Plaintiff/Plaintiff's Attorney" (Plaignant ou a son avocet) nomme ci-dessous.

UNOFFICIAL DOCUMENT

Filing # 220763177 E-Filed 04/10/2025 03:02:42 PM

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/.

UNOFFICIAL DOCUMENT

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

UNOFFICIAL DOCUMENT

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/C4oL1GvRm7Y/.
[3] Ganjaleaks, Instagram (Sept. 15, 2024), https://www.instagram.com/p/C_8nRIGvtC3/.
[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.

UNOFFICIAL DOCUMENT

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

[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/.

UNOFFICIAL DOCUMENT

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

UNOFFICIAL DOCUMENT

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

UNOFFICIAL DOCUMENT

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

UNOFFICIAL DOCUMENT

Filing # 220763177 E-Filed 04/10/2025 03:02:42 PM

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://thephysicians.com/what-is-trulieve/.

UNOFFICIAL DOCUMENT

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

UNOFFICIAL DOCUMENT

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]

UNOFFICIAL DOCUMENT

[2] Ganjaleaks, Instagram (March 17, 2024), https://www.instagram.com/p/C4oL1GvRm7Y/.
[3] Ganjaleaks, Instagram (Sept. 15, 2024), https://www.instagram.com/p/C_8nRIGvtC3/.
[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.

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

[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/.

UNOFFICIAL DOCUMENT

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

UNOFFICIAL DOCUMENT

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

UNOFFICIAL DOCUMENT

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

UNOFFICIAL DOCUMENT

Enclosure 4
Florida
Secretary of State
Acceptance of Service
July 18, 2025

UNOFFICIAL DOCUMENT

FLORIDA DEPARTMENT OF STATE

Division of Corporations

July 2, 2025

SHANNON B. TIMMANN

Pursuant to Chapter 48.161 Florida Statutes, substitute service of process was accepted for NATHAN JUREWICZ in case number 2025CA001071CAAXES and was filed on June 23, 2025 at 4:00 PM.

Plaintiff(s)
TRULIEVE, INC.,
v.
Defendant(s)
NATHAN JUREWICZ

The Secretary of State does not forward documentation to the defendant. All inquiries on behalf of this defendant should be made to the attorneys involved.

Tanner J. Turnmire
Processor of Service

Division of Corporations
P.O. Box 6327, Tallahassee, Florida 32314

Letter No. 250702057SOP.01

UNOFFICIAL DOCUMENT

Exhibit B

To Pl.'s Mot. for Entry of Default

(Pl.'s Letter dated Mar. 24, 2025)

UNOFFICIAL DOCUMENT

Subject:	Time-Sensitive Legal Correspondence re Trulieve
Date:	Monday, March 24, 2025 at 3:54:08 PM Eastern Daylight Time
From:	Hannah Menchel <hannah.menchel@mwpp.com>
To:	shortsalenow@gmail.com <shortsalenow@gmail.com>, njurewicz@gmail.com <njurewicz@gmail.com>
CC:	Megan Meier <megan.meier@mwpp.com>, Shannon Timmann <shannon.timmann@mwpp.com>
Priority:	High
Attachments:	image001.png, 20250324 Ltr from M. Meier to Ganja Leaks re Trulieve.pdf

Mr. Jurewicz,

Please see the attached letter and confirm receipt of the same.

Best,
Hannah

Hannah Menchel, Associate
MEIER WATKINS PHILLIPS PUSCH
919 18th Street, NW, Suite 650
Washington, DC 20006
Direct: +1 (703) 989 8533
Website

MWPP MEIER WATKINS PHILLIPS PUSCH

Chambers TOP RANKED High Net Worth 2024 Meier Watkins Phillips Pusch LLP

UNOFFICIAL DOCUMENT

MEIER WATKINS PHILLIPS PUSCH

Megan L. Meier
megan.meier@mwpp.com
(202) 280-4454

March 24, 2025

Nathan Jurewicz
3053 Calvano Dr.
Land O Lakes, FL 34639
Email: shortsalenow@gmail.com
Email: njurewicz@gmail.com

Re: Trulieve, Inc.

OFFICIAL DOCUMENT

Dear Mr. Jurewicz:

We write on behalf of our client, Trulieve, Inc., to demand that you delete the following false claims that you made about Trulieve on social media.

In an Instagram post on March 17, 2024, you falsely claimed that Trulieve got "caught covering up that they poisoned their patients" with mold (depicted in the post).

In an X post on June 11, 2024, you falsely claimed that Trulieve had "been caught using illegal herbicides, pesticides, and plant growth regulators" and that Trulieve "deleted thousands of health complaints from the FDACS website."

In an X post on September 30, 2024, you falsely claimed that "Trulieve's products are laced pesticides, herbicides, and fungicides that are not properly flushed."

In an X post on October 3, 2024, you 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."

Your claims are demonstrably false.

First, Trulieve doesn't use illegal pesticides, pesticides, or plant growth regulators. Trulieve uses only pesticides that are registered with the EPA and OMRI certified, 100% organic. Trulieve didn't—and obviously doesn't have the authority to—"delete[] thousands of health complaints from the FDACS website."

Second, 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 third-party state certified labs.[1]

For the avoidance of doubt, this constitutes a formal demand for retraction pursuant to Florida Statute § 770.02. Please delete the false posts identified above and in our previous letters (and any other posts containing false claims) within five days.

Reserving all rights.

Kind regards,



Megan L. Meier

UNOFFICIAL DOCUMENT

[1] 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/.