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

TRULIEVE, INC.,

Plaintiff,

v.

Case No.: 2025-CA001071-CAAXES

NATHAN JUREWICZ

Defendant.

PLAINTIFF TRULIEVE, INC.'S RESPONSE IN OPPOSITION TO DEFENDANT'S MOTION TO DISMISS

INTRODUCTION

This defamation case arises from damaging false accusations that a representative of Trulieve's competitors made on social media while hiding behind the pseudonym "GanjaLeaks." In his posts, Defendant falsely accused Trulieve, a licensed Medical Marijuana Treatment Center, of poisoning patients and using "illegal workers." Defendant has publicly lied about being GanjaLeaks, ignored repeated requests for retractions, dodged service of Trulieve's complaint, and blown the deadline to respond to the complaint, all while forcing Trulieve to incur significant fees and costs to mitigate the harm to its reputation and set the record straight. Only after Trulieve moved for judicial default did Defendant apparently decide to start taking this case seriously. He has now belatedly moved to dismiss the complaint. The Court should not even consider Defendants' Motion because it is untimely.

Even if Defendant's Motion were timely, the arguments in it are meritless. ***First***, Trulieve has alleged that Defendant acted with actual malice, so even if Trulieve were deemed a public figure, its complaint cannot be dismissed. ***Second***, Defendant is not a member of the media, so Trulieve does not need to plead special damages. ***Third***, Trulieve has pled special damages

anyway. And ***finally***, the anti-SLAPP law does not apply here because the challenged speech is commercial and Trulieve's complaint states a claim. Defendant's Motion should therefore be denied.

BACKGROUND

Trulieve was founded in Florida by three family-owned nurseries and is currently a licensed Medical Marijuana Treatment Center in Florida. (Compl. ¶ 4.) Defendant, on information and belief, has worked for several of Trulieve's competitors. (*Id.* ¶ 5.) He operates several social media accounts under the pseudonym GanjaLeaks. (*Id.*) Hiding behind that moniker, over the course of several months, Defendant levelled several false and defamatory accusations against Trulieve:

- On March 17, 2024, Defendant 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).
- On June 11, 2024, Defendant published an X post in which he falsely claimed that Trulieve "deleted thousands of health complaints from the FDACS website."
- On September 15, 2024, Defendant 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).
- On September 30, 2024, Defendant published an X post in which he falsely claimed that "Trulieve's products are laced pesticides, herbicides, and fungicides that are not properly flushed."
- On October 3, 2024, Defendant 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."
- On January 31, 2025, Defendant published an X post in which he falsely claimed that Trulieve was "hiring illegal workers."

(*Id.* ¶ 11.)

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Thousands of social media users, including Trulieve patients, saw these false claims. Trulieve has never "poisoned patients" with "pesticides, herbicides and fungicides that are not properly flushed" or "toxic levels of mold." (*Id.* ¶ 13.) In fact, Trulieve does not sell products unless they have passed testing by independent, state certified labs that ensure compliance with all applicable regulations. (*Id.*) Nor has Trulieve deleted health complaints from the FDACS website; it does not even have the practical ability to do so. (*Id.* ¶ 14.) And far from "hiring illegal workers," Trulieve has implemented robust processes to ensure that its employees are legally authorized to work in the United States. (*Id.* ¶ 15.) As demonstrated during a routine audit conducted by the Florida Department of Law Enforcement ("FDLE"), 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. (*Id.*)

Trulieve sought to unmask GanjaLeaks so that it could put them on formal written notice of the facts debunking the claims and demand a retraction. (*See* Exhibit A, Shannon Timmann Affidavit of Compliance with Fla. Stat. 48.161 ("Timmann Aff.") ¶ 5, filed Aug. 1, 2025.) To that end, Trulieve hired a private investigator and eventually learned that Defendant was GanjaLeaks. (Timmann Aff. ¶¶ 4-5.) Then, on September 30, 2024, Trulieve sent Defendant the first of three letters correcting Defendant's false statements and requesting that he retract them. (*Id.* ¶ 5; Compl. ¶ 19.) The letter explained that Trulieve only uses pesticides that are registered with the EPA and OMRI-certified, 100% organic. (Timmann Aff. at Exhibit B.)

Rather than standing by his statements, or even admitting to making them, Defendant chose to lie again. He published a social media video announcing that he received a letter from Trulieve but (falsely) denying that he was GanjaLeaks. (Timmann Aff. ¶ 5.)[1] He went on to spread more

[1] Defendant as "rabbitholeot," INSTAGRAM (Nov. 3, 2024), https://www.instagram.com/reel/DB67wxvSfYf/ (last visited August 21, 2025).

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lies about Trulieve, prompting two more retraction requests.

After Defendant falsely accused Trulieve of "hiring illegal workers," Trulieve sent him a second letter on February 5, 2025, which attached documentary evidence confirming that Trulieve had "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." (Compl. ¶ 19.) 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 Defendant 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. (*Id.*) Defendant never responded, leaving his false and defamatory statements online for the world to continue to see.

Defendant knew his statements about Trulieve were false. As a representative of Trulieve's competitors, Defendant set out with a financial motive to spread damaging lies about Trulieve. In advancing the financially motivated, false, preconceived narrative that Trulieve was "poisoning its patients" and hiring "illegal workers," Defendant intentionally disregarded publicly available facts that contradicted his claims, purposefully avoided contacting Trulieve or otherwise investigating his claims, and refused to retract after being put on notice of the truth. (Compl. ¶¶ 1, 5, 19.)

Trulieve finally sued to clear its name in early April 2025. Serving Defendant, however,

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proved difficult and costly. Trulieve, through its agents, tried to serve Defendant at each of his last known addresses, spoke with his relatives and associates about where he might be found, and chased down every lead available regarding his whereabouts. (Timmann Aff. ¶¶ 7-8.) On April 29, 2025, a Trulieve agent finally heard from Defendant. (*Id.* ¶ 9.) The agent was in the presence of Defendant's father, who called Defendant on speaker phone. (*See* Exhibit D to Timmann Aff. (Affidavit of Nicole Padro ¶ 9.)) During that call, Defendant admitted that he did not intend to attend court and was actively avoiding being served. (*Id.*) Trulieve still made several additional attempts at service, but Defendant successfully concealed his whereabouts. (Timmann Aff. ¶¶ 10-11.)

Trulieve eventually resorted to substituted service under Fla. Stat. 48.161. The Florida Department of State issued notice of acceptance of service of process on July 2 and transmitted the notice to undersigned counsel on July 18. (Timmann Aff. ¶¶ 12-13.) The same day, Trulieve gave Defendant notice of service of process and acceptance of process. (*Id.* ¶ 14.) That package was sent to the same physical and electronic mail addresses as the first retraction letter that Defendant publicly admitted to receiving. (*Compare* Exhibit B to Timmann Aff. *with* Exhibit H to Timmann Aff.)

Defendant's deadline to respond to the complaint was no later than August 7. Several weeks after that deadline passed, Defendant still had not responded to the complaint. So, on August 22, Trulieve moved for a judicial default under Fla. R. Civ. P. 1.500(b), providing Defendant with courtesy copies of the motion via mail and email. (*See* Pl.'s Mot. Default.)

Rather than respond to that motion or the complaint, Defendant started an online fundraiser for legal fees to defend this case. On August 25, Defendant published a video in which he

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"unmasked" himself as GanjaLeaks and implored followers to fund his legal defense.[2] This confirmed that Defendant had publicly lied about his identity and publishing the posts in question.

Defendant belatedly moved to dismiss the complaint on August 27.

LEGAL STANDARD

In Florida, the defendant bears a significant burden on a motion to dismiss: "A complaint is not subject to dismissal for failure to state a cause of action 'unless the movant can establish beyond any doubt that the claimant could prove no set of facts whatever in support of his claim.'" *Johnson v. Gulf Cnty.*, 965 So. 2d 298, 299 (Fla. 1st DCA 2007) (quoting *Ingalsbe v. Stewart Agency, Inc.,* 869 So.2d 30, 35 (Fla. 4th DCA 2004)). In reviewing a motion to dismiss, the Court "must accept all well-pleaded allegations as true," "consider those allegations in the light most favorable to the plaintiff[]," "draw all inferences in favor of the [plaintiff]," and limit its review "to the four corners of the [complaint]." *Alvarez v. E & A Produce Corp*., 708 So. 2d 997, 999 (Fla. 3d DCA 1998); *Hevey v. News-J. Corp.,* 148 So. 2d 543, 550 (Fla. 1st DCA 1963) (same, reversing dismissal of a defamation claim); *Siegle v. Progressive Consumers Ins. Co.,* 819 So. 2d 732, 734–35 (Fla. 2002); *Fed. Nat. Mortg. Ass'n v. Legacy Parc Condo. Ass 'n, Inc.*, 177 So. 3d 92, 94 (Fla. 5th DCA 2015); *Scott v. Busch*, 907 So. 2d 662, 665 (Fla. 5th DCA 2005) (citing cases and reversing dismissal of defamation claim).

Moreover, to the extent Defendant seeks dismissal of Trulieve's complaint with prejudice, that request must be met with even higher scrutiny. Courts in Florida "have agreed that it is an abuse of discretion to dismiss a complaint with prejudice unless it appears that the privilege to amend has been abused or that the complaint is clearly unamendable." *Thompson v. Inv. Mgmt. & Rsch., Inc*., 745 So. 2d 475, 476 (Fla. 5th DCA 1999); *see also Intego Software, LLC v. Concept*

[2] Nathan Defendant as "GanjaLeaks," X (FORMERLY TWITTER), (Aug. 27, 2025) https://x.com/GanjaLeaks/status/1960749900469297564.

Dev., Inc., 198 So. 3d 887, 892 (Fla. 1st DCA 2016) ("[R]efusal to allow amendment of a pleading constitutes an abuse of discretion unless it clearly appears that allowing the amendment would prejudice the opposing party; the privilege to amend has been abused; or amendment would be futile.") (citation omitted). Furthermore, "where a party may be able to allege additional facts, or where the ultimate facts alleged may support relief based upon another theory, dismissal of a complaint with prejudice is an abuse of discretion." *Thompson*, 745 So. 2d at 477. Thus, in the unlikely event this Court finds Trulieve must plead additional allegations, Trulieve must be given an opportunity to amend.

ARGUMENT

This Court should deny Defendant's motion because it is untimely and substantively meritless.

I. Defendant's Motion to Dismiss is Not Timely.

The Court should not even consider the merits of the motion because it is untimely. Under Florida Rule of Civil Procedure 1.140, Defendant was required to respond to the complaint within 20 days after service. In the context of substituted service, "[s]ervice of process is effectuated . . . on the date the service is received by the Department of State." Fla. Stat. 48.161(7). Here, that date was no later than July 2, when the Department of State issued notice of acceptance of service. (Timmann Aff. ¶¶ 12-13.) Accordingly, under the plain terms of Section 48.161(7), Defendant's deadline to respond to the complaint expired on July 22, 2025. Even if the date Defendant was provided notice of substituted service (July 18) were considered the date of service, the deadline to respond to the complaint would have expired on August 7. (Timmann Aff. ¶¶ 12-13.)

Defendant missed that deadline by several weeks, filing his Motion to Dismiss on August 27. For that reason, the Court should not even consider the Motion and should instead let this case proceed to discovery. *Cf. Thompson v. McDonald*, No. 16-80811-CIV, 2017 WL 11581898, at *2

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(S.D. Fla. June 5, 2017) ("[B]ased upon the clear terms of [federal] Rule 12(b), the Government cannot now bring a motion to dismiss, and therefore the arguments made therein concerning the sufficiency of the allegations of the Complaint are rejected on the basis of untimeliness."); *Zo Skin Health, Inc. v. Salz*, No. 14-CIV-21376, 2014 WL 4185385, at *1 (S.D. Fla. Aug. 22, 2014) ("Because Salz filed her answer before filing her Motion, that Motion is untimely, and must be denied.").

II. Defendant's Motion to Dismiss Fails on the Merits.

Even if the Court reaches the merits, Defendant's Motion should be denied because Trulieve's complaint states a claim. In order to state a claim for defamation in Florida, a plaintiff must sufficiently allege the defendant: (1) published (2) a false and (3) defamatory statement (4) about the plaintiff, (5) that the defendant acted "with knowledge or reckless disregard as to the falsity on a matter concerning a public official, or at least negligently on a matter concerning a private person," and (6) harm from the statement. *Jews for Jesus, Inc. v. Rapp*, 997 So. 2d 1098, 1106 (Fla. 2008). Defendant concedes Trulieve has sufficiently pled elements one through four, and, as explained below, Defendant's challenges to the remaining elements of Trulieve's defamation claim are meritless.

A. The Complaint Alleges That Defendant Acted with Actual Malice.

Defendant argues that the complaint should be dismissed for a failure to plead actual malice because, Defendant asserts, Trulieve is a public figure. As an initial matter, Defendant's conclusory assertions are insufficient to establish that Trulieve is a public figure, *see Spear ex rel. Spear v. Publix super Markets, Inc.*, No. 08-81453-CIV-MARRA, 2008 WL 5276441, at *4 (S.D. Fla. Dec. 18, 2008) (defendant has burden to establish plaintiff's public figure status), which is a fact-bound issue that should not be resolved on a motion to dismiss, *see Dockery v. Florida Democratic Party,* 719 So. 2d 9, 10-11 (Fla. 2d DCA 1998) (finding that in the absence of a

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"stipulation or valid admission in [the] record that the plaintiff was a public figure," the determination of whether a plaintiff is a public figure requires the presentation of evidence and is not properly decided on a motion to dismiss). More importantly, even if Trulieve were deemed a public figure, the actual malice standard would not warrant dismissal here. A plaintiff clears that hurdle by alleging that the defendant made the defamatory remarks "either knowing they were false or with a reckless disregard for the truth and without reasonable grounds for the Defendant' to believe they were true." *See Hood v. Connors*, 419 So. 2d 742, 743-44 (Fla. 5th DCA 1982) (quotations omitted) (reversing dismissal of defamation claim).

Trulieve has alleged that—and far more—here. Trulieve alleged that Defendant intentionally mispresented the facts, purposefully avoided contacting Trulieve for the facts, and refused to retract after being put on notice of the truth because, as a representative of Trulieve's competitors, he is financially motivated to damage Trulieve. Beyond all that, it's plausible that Defendant intentionally ***lied*** about Trulieve, given that he intentionally ***lied*** about whether he was the person lying about Trulieve.

- **Preconceived narrative and financial motive**. Trulieve alleged that Defendant, who worked for several of Trulieve's competitors, set out with a financially motivated bias and a negative preconceived narrative to serve his clients' interests. (Compl. ¶¶ 1, 5, 19); *see Harte-Hanks Commc'ns, Inc. Connaughton*, 491 U.S. 657, 668 (1989) ("[A] plaintiff is entitled to prove the defendant's state of mind through circumstantial evidence."); *Harris v. City of Seattle*, 152 Fed. Appx. 565, 568 (9th Cir. 2005) ("[E]vidence that a defendant conceived a story line in advance of an investigation and then consciously set out to make the evidence conform to the preconceived story is evidence of actual malice, and may often prove to be quite powerful evidence [of actual malice].").

- **Conscious disregard of contradictory facts**. Trulieve alleged that Defendant and "intentionally disregard[ed] publicly available sources" about Trulieve's product quality testing that contradicted Defendant's accusations. (Compl. ¶ 19); *Eramo v. Rolling Stone LLC*, 209 F. Supp. 3d 862, 871-872 (W.D. Va. 2016) (noting that "consciously disregard[ing] contradictory evidence" is circumstantial evidence of actual malice).

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- **Purposeful avoidance of the truth**. Trulieve alleged that Defendant "purposefully avoid[ed] contacting Trulieve for facts before publication." (Compl. ¶ 19.); *Biro v. Conde Nast*, 807 F.3d 541, 546 (2d Cir.2015) (failure to investigate can be circumstantial evidence of actual malice); *Eramo*, 209 F. Supp. 3d at 871-73 (same).

- **Refusal to retract after direct notice of truth.** Trulieve alleged that it "specifically put Defendant 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 . . . . But Defendant refused to retract and continued to make the false claims." (Compl. ¶ 19); *Golden Bear Distrib. Sys. of Tex., Inc. v. Chase Revel, Inc.*, 708 F.2d 944, 950 (5th Cir. 1983) (post-publication refusal to retract may show recklessness at time of publication); Rodney A. Smolla, 1 Law of Defamation § 3:80 (2d ed.) ("[F]ailure to retract may be probative of the existence of actual malice."); Restatement (Second) of Torts § 580A cmt. d (A failure to retract can "be relevant in showing recklessness at the time the statement was published . . . even though the conduct occurred subsequent to the publication.").

Defendant does not grapple with any of these well-pled allegations. Instead, he cherry-picks a single quote from the complaint and mistakenly frames it as the only allegation pertinent to actual malice. (MTD ¶ 9 ("Plaintiff's Complaint contains only conclusory allegations regarding actual malice, stating that Defendant acted "intentionally, willfully, maliciously, and in conscious disregard of Trulieve's rights and reputation and of the truth" without pleading specific facts that would establish Defendant knew the statements were false or acted with reckless disregard for their truth or falsity.")) But that misapprehends how the Complaint pleads actual malice and ignores the well-pled allegations described above. Trulieve has alleged actual malice.

B. Trulieve's Complaint Sufficiently Alleges Damages.

Defendant's next argument, that Trulieve has failed to plead special damages, is based on the flawed premise that he is a "media defendant." (MTD ¶ 13.) Defendant asserts that "Florida law requires that a plaintiff in a defamation action against a media defendant must plead and prove actual damages" but stops short of briefing the issue. He cites no relevant legal authority on what makes a defendant a "media defendant," and he points to no allegations in the Complaint supporting his argument that he is a media defendant. (*Id.*)

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That is likely because nothing in the caselaw or Complaint helps Defendant on this issue. While Florida law does require plaintiffs to plead special damages in cases against media defendants, the cases standing for that proposition involved claims against the ***media***—not representatives of a target's corporate competitors trying to launder false accusations through pseudonymous social media accounts. *See Edelstein v. WFTV, Inc.*, 798 So. 2d 797, 797 (Fla. Dist. Ct. App. 2001) (defamation claim against newspaper); *Mid-Fla. Television Corp. v. Boyles*, 467 So. 2d 282, 283 (Fla. 1985) (defamation claim against television company).

The Complaint here alleges that Defendant is a representative of Trulieve's competitors, not a newspaper, television company, or other media defendant. (Compl. ¶¶ 1 (alleging that Defendant "represents Trulieve's competitors"); 5 (alleging that Defendant works for and has worked for a number of Trulieve's competitors"); 19 (alleging that Defendant had a "financially motivated bias and a negative preconceived narrative to disparage his clients' biggest competitor.")) Defendant's contention seems to be that posting anonymously on X and Instagram makes him a media defendant. If that were true, then anyone who posts on social media could be a media defendant. Defendant cites no legal authority for that sweeping proposition.

Because Defendant is not a media defendant, Trulieve's allegations that the statements at issue were defamatory *per se* alone are enough to satisfy the damages element of its defamation claim. This is because when, as here, a statement is defamatory *per se*, "the law presumes damages." *Show Plus Promotions, LLC v. Valley Nat'l Bancorp.*, No. 24-cv-80126, 2024 WL 3745213, at *9 (S.D. Fla. May 13, 2024), report and recommendation adopted, No. 24-cv-80126, 2024 WL 3791896 (S.D Fla. Aug. 13, 2024) (rejecting defendant's argument that the plaintiff failed to allege "sufficient facts to show damages," because damages were presumed). As detailed above, Trulieve's Complaint sufficiently alleges that the statements at issue are defamatory *per se*

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and "necessarily import damage, and therefore . . . general damages need not be pleaded or proved, but are conclusively presumed to result; nor need special damage be shown in order to sustain the action." *Campbell v. Jacksonville Kennel Club*, 66 So. 2d 495, 497 (Fla. 1953) (internal citation omitted).

But even if Defendant were a media defendant and even if damages were not presumed, the complaint could not be dismissed because it also alleges special damages. Specifically, the complaint alleges that Trulieve has lost sales to people who saw the defamatory statements and "has been forced to make an expenditure of more than $62,000 (and counting) to remedy the defamation." (Compl. ¶¶ 23-24.) That is special harm. *See* 1 Rodney A. Smolla, Law of Defamation § 7:2 (2d ed. 2025) ("The term 'special harm' (or its synonym, 'special damage') is a narrow term of art in the law of defamation that refers to 'the loss of something having economic or pecuniary value.'"). Defendant argues that Trulieve has failed to allege the "extent" of the lost sales or "what these expenditures were for or how they directly resulted from Defendant's statements," (MTD ¶¶ 12-13), but ignores that those expenditures were made "to remedy the defamation," (Compl. ¶ 24), and he cites no cases requiring greater specificity or different verbiage.

Moreover, in Florida defamation law, "[c]ompensatory damages are not limited to quantifiable out-of-pocket loss," and "[t]he injured party may recover damages resulting from impaired reputation and standing in the community." *Army Aviation Heritage Found. & Museum, Inc. v. Buis*, 504 F. Supp. 2d 1254, 1259 (N.D. Fla. 2007). Trulieve has plausibly alleged that it "has suffered and will continue to suffer reputational and economic harm," as a "direct and foreseeable result of Defendant's" publications. (Compl. ¶ 25.) Defendant seemingly expects an exact computation of these damages. (MTD ¶ 13.) But "[t]he law provides little guidance in

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determining the amount of compensatory damages to which a defamed party is entitled," and "[t]here is no exact standard for fixing the compensation to be awarded on account of such elements of damage." *Army Aviation Heritage Found.*, 504 F. Supp. 2d at 1260. That Trulieve has not alleged an exact computation of all its compensable damages is not fatal to its complaint, especially since Trulieve has alleged the ongoing nature of this difficult-to-quantify harm. Further, Defendant will have ample opportunity to explore the bases of Trulieve's damages claim in discovery.

C. This Action is Not Barred by Florida's Anti-SLAPP Law.

Defendant argues that Florida's anti-SLAPP law, Fla. Stat. 768.295, bars this case. (MTD ¶¶ 20-22.) But the anti-SLAPP statute only applies where the plaintiff sues "primarily because [the defendant] has exercised the constitutional right of free speech . . . protected by the First Amendment." Fla. Stat. 768.295(3). This case involves *commercial* speech motivated to inflict competitive injury, not speech fully protected by the First Amendment. (*See* Compl. ¶¶ 1 (alleging that Defendant "represents Trulieve's competitors"); 5 (alleging that Defendant works for and has worked for a number of Trulieve's competitors"); 19 (alleging that Defendant had a "financially motivated bias and a negative preconceived narrative to disparage his clients' biggest competitor.")) That is a critical distinction here because "commercial speech enjoys a limited measure of protection, commensurate with its subordinate position in the scale of First Amendment values." *Harris v. Agency for Health Care Admin.*, 671 So. 2d 230, 231 (Fla. 5th DCA 1996). Trulieve could not have brought this suit "primarily" to thwart Defendant's First Amendment rights when the challenged speech enjoys limited constitutional protection. *See id.*

Even if the speech were not commercial, it is entirely unprotected because it is defamatory. *See McQueen v. Baskin*, 377 So. 3d 170, 176 (Fla. 2nd DCA 2023) (finding that anti-SLAPP statute did not apply because "[a]ctionable defamation . . . is not constitutionally protected speech.").

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Defendant insists that Trulieve's defamation claim is "meritless" because the challenged statements are "protected opinions on public matters." (MTD ¶¶ 15, 20.) But if a statement "can be objectively proven as true or false," it's not a protected opinion. *See Petricca v. Saxony Condo. Ass'n, Inc.*, No. 23-CV-81581, 2024 WL 3345516, at *6 (S.D. Fla. Apr. 15, 2024) (rejecting opinion defense where defendant accused plaintiff of conduct "that can be objectively proven as true or false."). In fact, each of the challenged statements can be objectively proven true or false:

- Either Trulieve got "caught covering up that they poisoned their patients" with mold or it did not (it did not).
- Either Trulieve "deleted thousands of health complaints from the FDACS website" or it did not (it did not, and could not).
- Either Trulieve was "about to be exposed for poisoning patients" with mold or it wasn't (it wasn't).
- Either "Trulieve's products are laced pesticides, herbicides, and fungicides that are not properly flushed" or they're not (they're not).
- Either 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" or not (again, not).
- Either Trulieve was "hiring illegal workers" or it wasn't (it wasn't).

(Compl. ¶ 11.) These are all factual issues that can be proved or disproved.

Defendant argues that *Trulieve, Inc. v. Republican Party of Florida*, Case No. 2024-CA-000697 (Fla. 2d. Cir. Ct. Mar. 7, 2025) somehow requires this Court to apply the anti-SLAPP statute. But that case involved a different defamation claim based on an entirely different set of facts (i.e., a political advertisement suggesting that Trulieve sought a monopoly on legalized cannabis). And the court there *denied* the defendant's anti-SLAPP motion because, the court found, the suit had "limited to no effect on [the defendant's] ability to speak on the issues they desire to speak on," and the challenged language was "not sufficiently distant from defamatory

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language for Plaintiff's claim to be without merit." Slip Op. at 8. Here, too, Defendant cannot plausibly maintain that Trulieve has silenced him while he continues to speak publicly about the issues raised in this case.[3] Nor can Defendant show that this case is "meritless" and that Trulieve can prove "no set of facts whatever in support of his claim." *Johnson*, 965 So. 2d at 299. Rather, as explained above, Trulieve has plausibly alleged each element of its defamation claim. Accordingly, the anti-SLAPP statute does not bar this case.

III. The Court Should Order Defendant to Pay Trulieve's Attorney's Fees and Costs for Forcing Trulieve to Make Numerous Attempts at Personal Service and Effectuating Substituted Service.

Defendant had no legitimate reason to evade service, and force Trulieve to effectuate substituted service. (*See* Timmann Aff. ¶¶ 6-15 (describing efforts to attempt personal service and effectuate substituted service.) That is the epitome of bad-faith, vexatious litigation conduct. It is not the proper way to contest a legal claim, and the Court should not bless it. Rather, the court should order Defendant to pay Trulieve's fees and costs incurred as a direct result of Defendant's evasion of service. The Court has significant discretion to award attorney's fees and other expenses in these circumstances. *See Moakley v. Smallwood*, 826 So. 2d 221, 227 (Fla. 2002) (noting that court has discretion to award attorney's fees to sanction bad-faith conduct and, where warranted, may award fees "directly related to the attorneys' fees and costs that the opposing party has incurred as a result of the specific bad faith conduct"). Here, those fees and costs include (1) amounts paid to Trulieve's process server for its many attempts at personal service; (2) attorney's fees incurred in researching substituted service and evaluating whether it was warranted and appropriate; (3) attorney's fees incurred in preparing submissions to the Florida Department of State and to Defendant related to substituted service; (4) attorney's fees incurred in connection

[3] Nathan Defendant as "GanjaLeaks," X (FORMERLY TWITTER), (Aug. 27, 2025) https://x.com/GanjaLeaks/status/1960749900469297564.

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with drafting and filing attorney Shannon Timmann's Affidavit of Compliance with Fla. Stat. 48.161; and (5) attorney's fees incurred in drafting and filing Trulieve's Motion for Entry of Judicial Default.

These fees and costs would have been avoided had Defendant responded to this lawsuit the proper way. (*See* Timmann Aff. ¶¶ 6-15.) It is only fair for Defendant, the party whose conduct made these expenses necessary, to pay for them. And the remedy is directly proportional to Defendant's sanctionable conduct. Courts have awarded fees where parties have similarly forced their opponents to incur expenses by failing to heed their responsibilities as litigants. *See, e.g.*, *Bank of New York v. Obermeyer*, 260 So. 3d 1155, 1156 (Fla. Dist. Ct. App. 2018) (awarding fees for failure to attend hearings); *Consultech of Jacksonville, Inc. v. Dep't of Health*, 876 So.2d 731, 736 (Fla. 1st DCA 2004) (awarding fees for failure to attend deposition). Should the Court agree, Trulieve will submit an affidavit of fees and costs to assist the Court in determining the appropriate sanction.

CONCLUSION

For the foregoing reasons, Defendant's motion must be denied. In the unlikely event that this Court finds Trulieve's Complaint is deficient, in whole or in part, Trulieve should be granted leave to amend its operative complaint to state additional facts supporting its claims. Trulieve should also be awarded fees and costs associated with Defendant's evasion of service.

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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
Megan L. Meier (*Pro Hac Vice Pending*)
Devin Bolger (*Pro Hac Vice Pending*)
MEIER WATKINS PHILLIPS PUSCH LLP
919 18th St NW, Suite 650
Washington, DC 20006
Telephone: 202-318-3655
Email: Shannon.timmann@mwpp.com
Email: megan.meier@mwpp.com
Email: devin.bolger@mwpp.com

Counsel for the Plaintiff

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished via the Florida Court's E-filing Portal to **C. Todd Marks, Esq., Westchase Law, PA, 12027 Whitemarsh Lane, Tampa, FL [Service@Westchaselaw.com], [Todd@WestchaseLaw.com]**, on this 16th day of September, 2025.

/s/Melanie R. Leitman
Attorney

Exhibit A

To Pl.'s Resp. In Opp. To Def.'s Mot. Dismiss

(Timmann Affidavit)

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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

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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

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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

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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.

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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.

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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.

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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.

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Exhibit A

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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**

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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.

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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.

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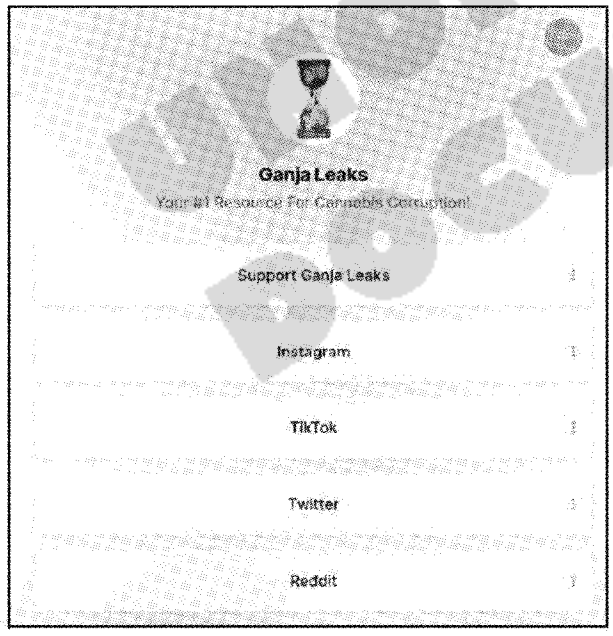

Graphic 1: GanjaLeaks' Linktree page.[1]



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]

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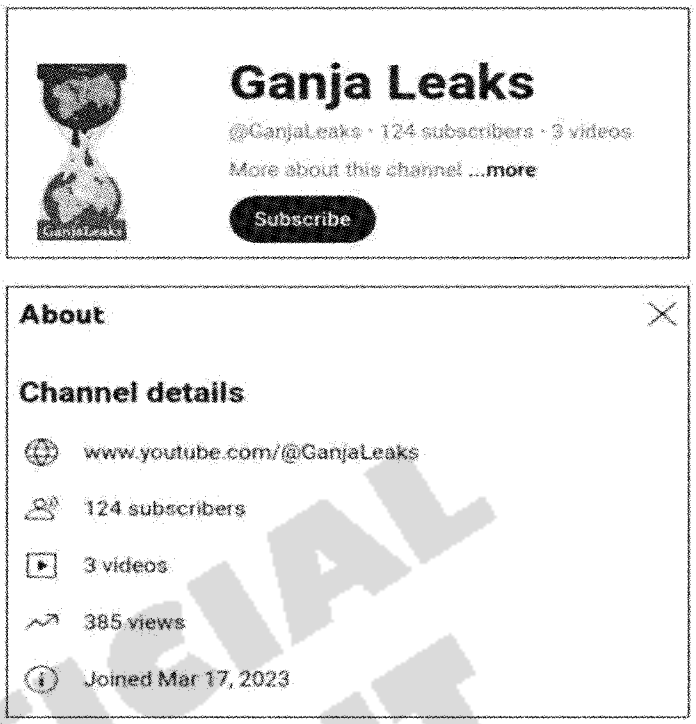
[3] https://www.instagram[.]com/ganjaleaks
[4] https://www.threads[.]net/@ganjaleaks
[5] https://www.patreon[.]com/GanjaLeaks



Graphic 6: GanjaLeaks' Reddit profile.[6]



Graphic 7: GanjaLeaks' YouTube profile.[7]

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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

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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

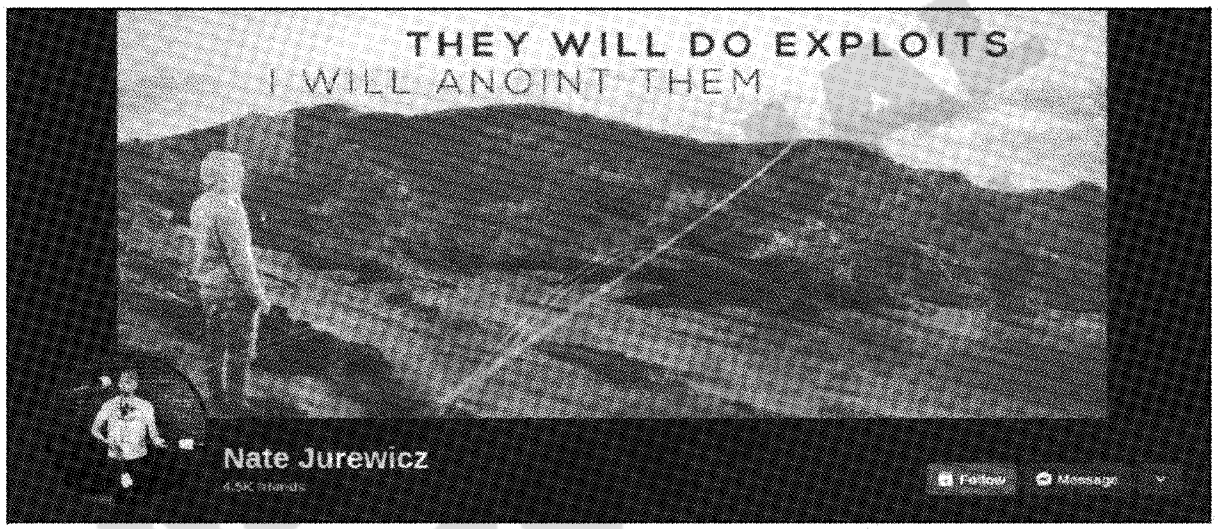
Nate Jurewicz

changeyourfatewithnate

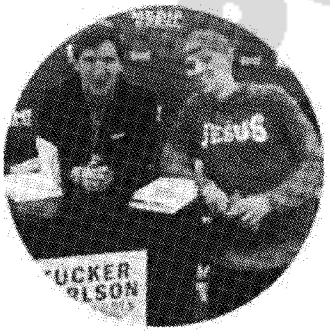
My name is Nate... follow me 🤍 Get on my email list and get the full scoop about the Christians For Cannabis Movement &... more

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.

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Exhibit B

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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

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MEIER
WATKINS
PHILLIPS
PUSCH

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

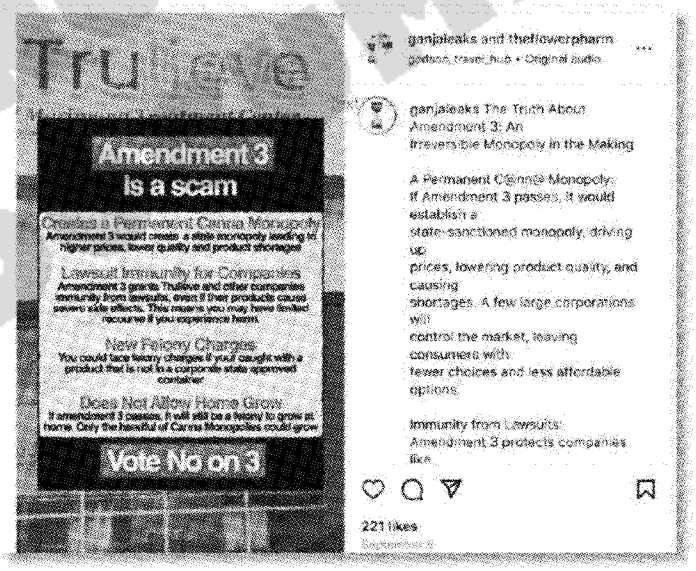
September 30, 2024

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."

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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

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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.

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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

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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

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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

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EXHIBIT A of B

(Trulieve Letter to Danielle Lucas)

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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.

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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

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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

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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;

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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

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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.

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****

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

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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.

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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

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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.

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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

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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: _____

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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.

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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/.

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

PARTIES

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

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

JURISDICTION AND VENUE

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

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

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

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

COUNT ONE – DEFAMATION

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

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if set forth fully herein.

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

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

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

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

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

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

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

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[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.
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[6] Ganja Leaks, X (Oct. 3, 2024, 10:56 AM), https://x.com/GanjaLeaks/status/1841854889401495707.
[7] Ganja Leaks, X (Jan. 31, 2025, 11:46 AM), https://x.com/GanjaLeaks/status/1885369006212661418.

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12. Jurewicz's above statements are demonstrably false.

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

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

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

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

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

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

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

[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/.

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

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

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

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

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

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

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

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

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

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

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

PRAYER FOR RELIEF

WHEREFORE, Trulieve respectfully requests that the Court:

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

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

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

JURY DEMAND

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

NOTICE OF INTENT TO SEEK PUNITIVE DAMAGES

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

Date: April 10, 2025

Respectfully Submitted,

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

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

Counsel for Plaintiff

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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.

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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.

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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.

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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:

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PRAYER FOR RELIEF

WHEREFORE, Trulieve respectfully requests that the Court:

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

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

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

JURY DEMAND

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

NOTICE OF INTENT TO SEEK PUNITIVE DAMAGES

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

Date: April 10, 2025

Respectfully Submitted,

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

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

Counsel for Plaintiff

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DOCUMENT

Exhibit F

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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

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Exhibit G

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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

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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.

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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

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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

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

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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/.

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

PARTIES

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

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

JURISDICTION AND VENUE

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

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

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

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

COUNT ONE – DEFAMATION

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

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if set forth fully herein.

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

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

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

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

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

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

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

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[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/.

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

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

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

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

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

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

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

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

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

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

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

PRAYER FOR RELIEF

WHEREFORE, Trulieve respectfully requests that the Court:

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

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

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

JURY DEMAND

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

NOTICE OF INTENT TO SEEK PUNITIVE DAMAGES

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

Date: April 10, 2025

Respectfully Submitted,

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

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

Counsel for Plaintiff

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

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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

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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.

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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).

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Case: _____

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

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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

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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

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DATED on April 22, 2025

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

Nikki Alvarez-Sowles
Pasco County Clerk & Comptroller

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Case: _____

FOR PROCEEDINGS BEFORE THE COURTS OF PASCO COUNTY

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

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-VS-
Nathan Jurewicz
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DATED on April 22, 2025

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

Nikki Alvarez-Sowles
Pasco County Clerk & Comptroller

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Case: _____

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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.

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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/.

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

PARTIES

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

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

JURISDICTION AND VENUE

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

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

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

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

COUNT ONE – DEFAMATION

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

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if set forth fully herein.

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

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

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

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

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

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

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

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[7] Ganja Leaks, X (Jan. 31, 2025, 11:46 AM), https://x.com/GanjaLeaks/status/1885369006212661418.

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12. Jurewicz's above statements are demonstrably false.

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

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

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

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

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

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

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

[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/.

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

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

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

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

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

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

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

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

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

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

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

PRAYER FOR RELIEF

WHEREFORE, Trulieve respectfully requests that the Court:

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

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

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

JURY DEMAND

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

NOTICE OF INTENT TO SEEK PUNITIVE DAMAGES

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

Date: April 10, 2025

Respectfully Submitted,

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

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

Counsel for Plaintiff

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JURY DEMAND

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

NOTICE OF INTENT TO SEEK PUNITIVE DAMAGES

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

Date: April 10, 2025

Respectfully Submitted,

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

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

Counsel for Plaintiff

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

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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

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