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

TRULIEVE, INC.,
Plaintiff,

Case No. 2025-CA001071-CAAXES

v.

NATHAN JUREWICZ,
Defendant.

Filed For Record
Pasco County, Florida
2026 FEB -2 PM 12:00
Nikki Alvarez-Sowles
Clerk & Comptroller
Pasco County, Florida

DEFENDANT'S AMENDED INITIAL DISCLOSURES

COMES NOW, Defendant, Nathan Jurewicz, pro se, and provides the following amended initial disclosures pursuant to Florida Rule of Civil Procedure 1.280(a):

A. WITNESSES:

a. Nathan Jurewicz
1938 Heron Cove Dr
Lutz, FL 33549
727-433-3120
realestatetaskforce@gmail.com

Mr. Jurewicz is the Defendant and has personal knowledge of the facts underlying his defenses, including the basis for the publications at issue and the truth of the statements made.

b. James Deese
Phone: 229-646-6114
(Address unknown; contact via phone)

Mr. Deese is a Marine Corps Veteran and former Trulieve employee. He will testify that mold was widespread in Trulieve's facility, that batch testing for mold was manipulated, and that mold-infested cannabis was nonetheless processed and sold because it was ground down into concentrate oil.

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c. Chastity Murdy
Phone: 850-450-9764
(Address unknown; contact via phone)

Ms. Murdy is a former Trulieve employee (employed from May 30, 2019, to approximately April 2020). She will testify that Trulieve exposed grow facility employees to unsafe and unsanitary conditions, including pervasive mold that could be smelled through two layers of masks due to inadequate air conditioning. Rats infested dry rooms and stole food from employee lockers. Employees were required to stand in one spot for 4–5 hours at a time and were often forced into mandatory 12-hour shifts with arbitrary schedule changes. Moldy incoming product was directed to be "bucked" into bags for processing into concentrates or other products.

d. Holly Bell
Phone: 615-533-1876
(Address unknown; contact via phone)

Ms. Bell was the former Director of Cannabis for the Florida Department of Agriculture and Consumer Services under Commissioner Nikki Fried. She will testify that she personally reviewed hundreds of consumer health complaints related to illness from cannabis consumption, with the majority involving Trulieve products and many specifically mentioning suspected mold. These complaints were reportedly "accidentally deleted" under the subsequent Wilton Simpson administration (per direct statement from Simpson's Chief of Staff, Kathy Mears, to Nathan Jurewicz). Ms. Bell will also testify that Trulieve donated $190,000 to Wilton Simpson's various PACs.

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e. Corporate representative(s) and records custodian(s) of Trulieve, Inc.

Plaintiff's representatives have information related to the factual bases of the claims and defenses in this case, as well as relevant records in Plaintiff's possession, custody, or control.

f. Martha Bueno
Instagram: @buenoformiami
(Address unknown; contact via Instagram)

g. Shai Ortiz
Instagram: @shai.high
(Address unknown; contact via Instagram)

h. All witnesses identified or referenced in Plaintiff's initial disclosures, discovery responses, or pre-trial disclosures.

Discovery is ongoing, and Defendant reserves the right to amend or supplement this witness disclosure.

B. DOCUMENTS:

The following documents, electronically stored information (ESI), and tangible things in Defendant's possession, custody, or control may be used to support his defenses:

a. All documents, ESI (including emails, messages, social media posts, and account records), and tangible items (including personal laptop and mobile phone) related to the "GanjaLeaks" X (formerly Twitter) and Instagram accounts operated by Defendant. These items are located at Defendant's home address.

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b. Video file titled "Complaint A.mp4" (Mark Zuckerberg meme showing mold in Trulieve grow facility).

c. Screenshot titled "Complaint B" (same Mark Zuckerberg meme post).

d. Screenshots titled "Complaint C-1" and "Complaint C-2" (evidence of Trulieve's $190,000 donations to Wilton Simpson's PACs).

e. Screenshot titled "Complaint E" (photos of mold in Trulieve grow facility).

f. Screenshots of TikTok messages and emails from a former Trulieve employee (titled "TikTok Screenshot 1," "TikTok Screenshot 2," "TikTok Screenshot 3," "Email Screenshot 1," and "Email Screenshot 2").

g. Raw files received from the former employee: four photos (titled "image2.jpeg," "image3.jpeg," "image4.jpeg," "image5.jpeg") and two videos (titled "Video.mov," "Video_1.mov") showing aphid-infested cannabis, mold, and interior of Trulieve's Jefferson County grow facility.

h. Trulieve marketing video downloaded from Trulieve's Facebook page showing interior facility details (titled "No-video-title-fbdown.net.mp4").

i. PowerPoint slide screenshots comparing leaked photos/videos to Trulieve marketing videos (titled "Same Trays," "Same Grow Medium," "Same Netting & Railing," "Same Fans," "Same Thermostat," "Same Wall Wiring") to demonstrate the leaked materials originated from a Trulieve facility.

j. PowerPoint slide screenshots providing information on aphids and their promotion of sooty mold fungus (titled "Aphid Info 1" and "Aphid Info 2").

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k. Video titled "hiring illegals.mp4" (former employee James Deese discussing Trulieve's hiring of individuals on worker visas without disclosing risks related to federal illegality of cannabis).

l. Video titled "TrulieveMoldVideo.mp4" (clip from "The Young Jerks" YouTube podcast featuring James Deese discussing widespread mold and manipulated batch testing at Trulieve).

m. Screenshot of NBC News Boston article regarding Trulieve's safety violations and fine following the death of employee Lorna McMurrey (link: https://www.nbcboston.com/investigations/former-mass-marijuana-company-fined-for-safety-violations-after-death-of-employee/3400881/?amp=1) (titled "News Article 1").

n. Screenshot of obituary and selected quotes from OSHA investigation documents regarding Lorna McMurrey's death from occupational asthma due to cannabis dust exposure (titled "Lorna McMurrey obituary").

o. Screenshot of Boston 25 News article regarding lawsuit filed by Lorna McMurrey's family (link: https://www.boston25news.com/news/local/lorna-was-my-life-lawsuit-filed-by-family-ma-worker-who-died-exposure-cannabis-dust/X37QTRTMFVGR3F5V7RTKEWQNGE/) (titled "News Article 2").

p. Screenshot of MJBizDaily article reporting Trulieve's $350,000 fine by the Massachusetts Cannabis Control Commission related to Lorna McMurrey's death (link: https://mjbizdaily.com/trulieve-fined-350k-over-massachusetts-marijuana-workers-death/) (titled "News Article 3").

q. Screenshot of Cannabis Business Times article regarding Laura Bruneau's testimony on workplace safety (link: https://www.cannabisbusinesstimes.com/business-issues-benchmarks/osha-compliance-in-cannabis-cultivation/news/15742659/mother-of-trulieve-cannabis-worker-who-died-testifies-on-workplace-safety-bill) (titled "News Article 4").

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r. Video clip of Laura Bruneau's testimony (titled "MomTestimony.mp4").

s. Screenshot of seven OSHA violations issued to Trulieve (titled "Trulieve OSHA Violations").

t. Video of James Deese discussing OSHA violations at Trulieve from "The Young Jerks" podcast (YouTube titled TrulieveOshaVideo.mp4)

u. A screenshot (titled GoFundMeGanjaLeaks) of the GoFundMe Ganja Leaks legal defense page which has only raised just $575 (as of 2/1/26) & can be found at https://www.gofundme.com/f/ganja-leaks-legal-defense-fund which contains a 34 minute video explaining all of the evidence and situation with the case. The defendant is financially insolvent and was forced to try to do a fundraiser to pay for legal defense which is why the defendant is representing himself pro se.

v. Ganjaleaks Go Fund me power point presentation which contains all the above mentioned evidence organized in a power point form so it's easy to understand in powerpoint, keynote & pdf format (titled GanjaLeaksGofundMe.pptx, GanjaLeaksGofunde.pdf & GanjaLeaksGofundMe).

w. Screenshots (titled GanjaLeaksGoFundMe1 & GanjaLeaksGoFundMe2) and actual video files (titled ganjaleaksinstagramgofundme1.mp4 & ganjaleaksgofundme2.mp4 published on the ganjaleaks page on January 17th & 19th as a promotional video to raise money for legal defense showing that the defendant has done everything in his power to raise money for his defense.

x. Screenshots of the defendants personal ($336.27) and business ($31.85) bank account balance (titled Personal Checking Account Balance 2/1/2026 & Business Checking Account Balance 2/1/2026) as well as screenshots of his biweekly independent contractor paycheck of $2,500 (titled Bi Weekly Indepandant Contractor Check 1.jpg & Bi Weekly Independant Contractor

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Check 2.jpg) every other week proving that the defendant lives off of $5,000 per month and can't afford expensive legal defense and has done everything in his power to make it this far.The defendant has $0 in real estate, stocks, gold, silver, crypto, oil or any other kind of assets.

x. Screenshots of an Indiegogo campaign (titled IndieGoGoFundraiser) that raised $2900 for the defendants legal defense that was launched in late August followed by 2 emails (titled IndieGoGoEmail 1 & IndieGoGoEmail 2) from IndieGoGo explaining that my campaign didn't qualify for payout because of an "internal policy: they changed on October 16th (which was well after the campaign was launched) which shows that the defendant has done everything in his power to get an attorney. The 2nd email also shows that he asked their support staff if Trulieve sent them a legal threat of which he never got a response.

t. Screenshots of a cease & desist from a social media video (titled MattTheWelder1 & MattTheWelder2) that Trulieve sent to Republican Florida Agriculture Commissioner Candidate, Matt The Welder (his legal name), a social media influencer after he repurposed a GanjaLeaks video. The entire video of his response to the cease and desist (after taking the original one down) can be found here https://www.instagram.com/reel/DSc2mjOAABY/?igsh=eHp6ZmNsc25wYTF2 . The defendant believes that because of the fact that Trulieve is sending legal threats & Cease & Desist to multiple social media influencers & press that it would indicate that they might have sent some sort of legal threat to Indiegogo (although he doesn't know for sure). This is another reason why the defendant couldn't couldn't afford to keep his previous Attorney Todd Marks.

u. Any additional documents or ESI identified during ongoing discovery.

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Discovery is ongoing, and Defendant reserves the right to amend or supplement this document disclosure.

C. INSURANCE:

Defendant has no insurance coverage that would apply to any damages claimed in this action.

Dated this 1st day of February, 2026.

/s/ Nathan Jurewicz

Nathan Jurewicz

1938 Heron Cove Dr

Lutz, FL 33549

realestatetaskforce@gmail.com

727-433-3120

Defendant, Pro Se

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished via the Florida Courts E-Filing Portal to Shannon B. Timmann, Esq., Meier Watkins Phillips Pusch LLP, 919 18th St NW, Ste 650, Washington, DC 20006 (shannon.timmann@mwpp.com), and Melanie Leitman, Esq., Stearns Weaver Miller, P.A., 106 East College Ave, Ste 700, Tallahassee, FL 32301 (mleitman@stearnsweaver.com; lrussell@stearnsweaver.com), on this 1st day of February, 2026.

/s/ Nathan Jurewicz

Nathan Jurewicz

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