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

TRULIEVE, INC.,
Plaintiff,
v.

Case No.: 2025-CA-001071-CAAXES
Division: J4 | Judge: Hon. Alicia Polk

NATHAN JUREWICZ,
Defendant.

DEFENDANT'S ANSWER AND AFFIRMATIVE DEFENSES

Defendant, NATHAN JUREWICZ, appearing pro se, answers Plaintiff's Complaint pursuant to Rules 1.110 and 1.140, Florida Rules of Civil Procedure, as follows. Each numbered paragraph below responds to the correspondingly numbered paragraph of the Complaint. Any allegation not expressly admitted is denied.

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ANSWER

1. Denied.

2. Defendant is without knowledge of Plaintiff's internal practices, certifications, or processes, and therefore denies the allegations of this paragraph.

3. Denied, including Plaintiff's characterizations of Defendant's motives. Defendant denies that Plaintiff is entitled to any of the relief described.

4. Admitted that Plaintiff is a licensed Medical Marijuana Treatment Center incorporated in Florida. Defendant is without knowledge as to the remaining allegations and therefore denies them.

5. Denied that Defendant resides in Land O'Lakes, Florida; Defendant resides in Lutz, Florida, and has done so since before this action was filed. Admitted that he created and operates social media accounts under the username "GanjaLeaks"; and that he has, at times, worked as an independent contractor representing hemp-product and kratom-product companies on a commission-only basis. Denied that Defendant has ever been paid, compensated, or directed by any person or company to publish, or to refrain from publishing, any content on GanjaLeaks. Denied that Defendant "works for" Trulieve's competitors in the sense alleged, and denied that any such work bears on the truth of the challenged publications. Admitted that Defendant has tagged and interacted with other social-media users, including persons named in this paragraph, in the ordinary course of publishing on matters of public concern; denied as to Plaintiff's

characterizations of “amplif[ication]” and “collaborat[ion].” Denied as to the remaining allegations of this paragraph.

6. Paragraph 6 states legal conclusions to which no response is required. To the extent a response is required, Defendant does not contest this Court's subject-matter jurisdiction.

7. Admitted that Defendant is a Florida resident. Defendant does not contest this Court's personal jurisdiction over him. The paragraph's remaining assertions are legal conclusions to which no response is required.

8. Paragraph 8 states legal conclusions to which no response is required. Defendant does not contest venue.

9. Denied. Specifically, Defendant denies that Plaintiff satisfied all conditions precedent, including, without limitation, service of notice fully complying with section 770.01, Florida Statutes, as to each publication alleged in the Complaint.

10. Defendant restates and incorporates his responses to the foregoing paragraphs as if fully set forth herein.

11. Admitted only that Defendant published posts on the GanjaLeaks accounts on or about the dates alleged, which publications speak for themselves and are the best evidence of their own complete contents and context. Denied that the quoted excerpts fairly or completely characterize those publications; denied that the statements were false; denied that the statements were defamatory; and denied as to all remaining allegations of this paragraph, including subparagraphs (a) through (f).

12. Denied.

13. Denied. Defendant is further without knowledge as to Plaintiff's internal testing practices and therefore denies the paragraph's allegations concerning them.

14. Denied, including Plaintiff's characterization of Defendant's publication.

15. Denied.

16. Denied, including the paragraph's legal conclusions.

17. Denied. The publications, read in their complete content and context, are protected expressions of opinion and rhetorical hyperbole on matters of public concern.

18. Denied.

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19. Admitted only that Defendant received correspondence from Plaintiff's counsel dated on or about September 30, 2024, February 5, 2025, and March 24, 2025, which correspondence speaks for itself. Denied that any such correspondence "debunked" Defendant's reporting, and denied as to each and every remaining allegation of this paragraph, including the allegations that Defendant acted with actual malice, harbored a financially motivated bias, avoided contact with Plaintiff, or disregarded contrary facts.

20. Denied.

21. Admitted that certain of the challenged publications were viewed by more than one thousand persons, as reflected in the view counts displayed on the respective platforms and in Defendant's account analytics. Defendant is without knowledge of the number of unique individuals who viewed any particular publication, of how many were Florida consumers, or of how many read any publication in full, and denies the allegation to the extent it asserts any specific figure. Denied that the number of views establishes that any viewer understood the publications as Plaintiff alleges, thought less of Plaintiff as a result, or that Plaintiff suffered any harm.

22. Admitted that certain GanjaLeaks posts tagged other social-media accounts; that Martha Bueno has on occasion shared or reposted content published by Defendant; and that Shai Ortiz has on occasion shared, reposted, or appeared as a co-author on content published by Defendant. Defendant does not presently recall which specific publications were shared, reposted, or co-published by either individual, and is without knowledge of the follower counts, reach, or viewership of any third party's account or republication. Denied that Ms. Bueno or Mr. Ortiz drafted, authored, or determined the content of any publication identified in paragraph 11; denied that Defendant "worked with collaborators" to create any defamatory statement; and denied that any publication of Defendant was defamatory. Denied as to the remaining allegations and characterizations of this paragraph.

23. Defendant is without knowledge and therefore denies the allegations of this paragraph.

24. Defendant is without knowledge and therefore denies the allegations of this paragraph.

25. Denied. Defendant denies that any publication of his was false, that any publication of his caused Plaintiff legally cognizable harm, and that Defendant is legally responsible for any harm Plaintiff claims to have suffered. To the extent Plaintiff has sustained reputational or economic harm, such harm was caused by Plaintiff's own conduct; by truthful information concerning that conduct that is available in the public domain, including government enforcement records; by the independent reporting, public statements, and first-hand accounts of third parties, including former employees of Plaintiff; and by other proceedings and matters involving Plaintiff — and not by any

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false statement of Defendant. Harm resulting from the publication of truthful information is not compensable.

26. Denied. Defendant denies that Plaintiff is entitled to compensatory, punitive, or any other damages or relief whatsoever.

Defendant denies each and every allegation of the Complaint's "Prayer for Relief" and denies that Plaintiff is entitled to any of the relief requested, including the damages demanded.

AFFIRMATIVE DEFENSES

Without assuming any burden of proof that properly rests with Plaintiff — including Plaintiff's burden to prove falsity and the requisite degree of fault — Defendant asserts the following defenses:

FIRST DEFENSE — TRUTH AND SUBSTANTIAL TRUTH. The challenged publications are true or substantially true. Under Florida law, a statement is not actionable where its "gist" or "sting" is true, and minor inaccuracies that do not affect the substance of the statement are immaterial. Jews for Jesus, Inc. v. Rapp, 997 So. 2d 1098 (Fla. 2008).

SECOND DEFENSE — PROTECTED OPINION AND RHETORICAL HYPERBOLE. The challenged statements, read in their complete content and context, are non-actionable expressions of pure opinion based on disclosed facts and/or rhetorical hyperbole, protected by the First Amendment to the United States Constitution and Article I, Section 4 of the Florida Constitution. Milkovich v. Lorain Journal Co., 497 U.S. 1 (1990); Greenbelt Coop. Publ'g Ass'n v. Bresler, 398 U.S. 6 (1970).

THIRD DEFENSE — CONSTITUTIONAL PROTECTION OF SPEECH ON MATTERS OF PUBLIC CONCERN. The challenged publications address matters of public concern — public health, product safety, and the conduct of a major regulated company — by a publisher engaged in newsgathering and reporting, and are protected by the First Amendment and Article I, Section 4 of the Florida Constitution. Plaintiff is a public figure, or in the alternative a limited-purpose public figure, and cannot establish by clear and convincing evidence that Defendant published any challenged statement with actual malice. New York Times Co. v. Sullivan, 376 U.S. 254 (1964).

FOURTH DEFENSE — ABSENCE OF FAULT. Defendant did not publish any challenged statement with actual malice, reckless disregard, or negligence. At the time of each publication, Defendant possessed and reasonably relied upon supporting information, including first-hand

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accounts of former employees of Plaintiff, communications from sources, publicly available records, and government documents.

FIFTH DEFENSE — FLORIDA ANTI-SLAPP STATUTE. This action is prohibited by section 768.295, Florida Statutes, as a suit that is without merit and brought primarily because Defendant exercised his constitutional rights of free speech in connection with a public issue. Defendant reserves and asserts his entitlement to all remedies available under section 768.295, including an award of costs and, to the extent applicable, reasonable attorney's fees incurred in connection with counsel retained in this action.

SIXTH DEFENSE — FAILURE TO COMPLY WITH SECTION 770.01. To the extent Defendant is a media defendant within the meaning of Chapter 770, Florida Statutes — an issue Defendant preserves for determination on a full evidentiary record — Plaintiff failed to serve notice fully complying with section 770.01, Florida Statutes, as to each publication sued upon, and this action is barred or limited accordingly. In any event, Plaintiff's damages are limited by section 770.02, Florida Statutes.

SEVENTH DEFENSE — FAILURE TO PROVE OR MITIGATE DAMAGES; CAUSATION. Plaintiff has suffered no damages proximately caused by any publication of Defendant; any harm to Plaintiff's reputation was caused by Plaintiff's own conduct, by truthful information in the public domain, or by the acts of third parties for which Defendant is not responsible; and Plaintiff has failed to mitigate its claimed damages.

EIGHTH DEFENSE — PUNITIVE DAMAGES. Plaintiff may not recover punitive damages absent compliance with section 768.72, Florida Statutes, including leave of court upon a proffered evidentiary basis, and any award of punitive damages would violate the due process protections of the United States and Florida Constitutions.

RESERVATION. Discovery is ongoing. Defendant reserves the right to seek leave to amend this Answer and to assert additional defenses as discovery proceeds.

DEMAND FOR JURY TRIAL

Defendant demands a trial by jury on all issues so triable.

Dated: August 31, 2026

Respectfully submitted,

/s/ Nathan Jurewicz
Nathan Jurewicz, Defendant, Pro Se

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on August 31, 2026, a true and correct copy of the foregoing was filed via the Florida Courts E-Filing Portal, which will serve a copy on all counsel of record at their designated e-service addresses.

/s/ Nathan Jurewicz
Nathan Jurewicz, Defendant, Pro Se

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