



41st Annual

# COLORADO CASE PROBLEM



## *Jordan Peterson vs Riley Quinn*

*Written by the Colorado Bar Association Mock Trial Committee*

[coloradohighschoolmocktrial.com](http://coloradohighschoolmocktrial.com)



## CASE SUMMARY

A high school student suffers a complete loss of smell (anosmia) after using a wellness supplement powder as a nasal spray, following viral social media content from a popular influencer. The influencer had promoted the powder supplement for its intended oral use but later posted content showing alternative "creative" uses, including as a nasal spray for "opening pores" and achieving a "healthy glow." The plaintiff used the product in this unintended manner and experienced severe nasal tissue damage resulting in permanent anosmia. The case explores influencer liability, product misuse, and the intersection of civil claims.

## **AVAILABLE WITNESSES**

### **Plaintiff**

1. Jordan Peterson
2. Taylor Peterson
3. Dr. Sam Chen – Expert

### **Defense**

1. Riley Quinn
2. Emerson Vale
3. Dr. Casey Torres – Expert

## **EXHIBITS**

Exhibit 1 – Dr. Sam Chen’s CV

Exhibit 2 – Dr. Casey Torres’s CV

Exhibit 3 – Text Exchange Between Vale and Peterson

Exhibit 4 – Riley Quinn Social Media Post

Exhibit 5 – Culinary Newspaper Clipping

Exhibit 6 – Instagram Messages Between Quinn and Synera LifeTech

Exhibit 7 – Email Exchange Between Quinn and Synera LifeTech

Exhibit 8 – TheraBloom Label and Ingredients

Exhibit 9 – Medical Bills

Exhibit 10 – ER Discharge summary

## STIPULATED FACTS

1. The Case Summary is not a part of the case materials, and its contents are not admissible and no reference to the Summary contents may be entered or referenced during the trial.
2. All exhibits included in the problem are true and accurate copies/depictions of what they purport to be and as a result, no objections to the authenticity of the exhibits will be entertained.
3. All witness statements and signatures are authentic.
4. All witnesses have knowledge of the facts contained in each of the stipulations.
5. The parties are properly before the Court, and jurisdiction and venue are proper.
6. Jordan Peterson has been diagnosed with and is experiencing permanent anosmia.
7. Riley Quinn received \$3,500 from Synera LifeTech, and the “Beauty Hacks” video had received 45,000 views in the first 24 hours.
8. The parties agree that the amounts of the Plaintiff’s medical bills are reasonable, and no further documents or testimony are necessary to prove those medical bills. The Parties also agree that the medical expenses total \$15,847.32. Witnesses may also testify regarding the nature and circumstances of any other economic or noneconomic injuries or losses suffered by the Plaintiff, but witnesses may not present specific dollar amounts that are not contained in the case materials. The attorneys, however, may propose and advocate for specific dollar figures for such losses in their closing arguments.

9. Dr. Chen and Dr. Torres have reviewed the other's witness statements. Both experts have had access to and have reviewed the same background medical reports of Plaintiff along with all witness statements. Dr. Torres has reviewed Dr. Chen's report of Jordan Peterson's physical examination. The parties have also agreed that each Doctor may comment on the other's witness statement, so long as the comments are supported by the information found in the commenting Doctor's witness statement.

10. The Defendant asserts the affirmative defense of comparative negligence, claiming that Plaintiff Jordan Peterson was negligent in relying solely on an influencer's video and a cousin's recommendation without reasonably verifying the safety or intended use of the TheraBloom product.

11. Stipulations cannot be contradicted or challenged.

DISTRICT COURT LARIMER COUNTY, COLORADO 201 Laporte Ave Fort Collins, Colorado 80521	
<b>Plaintiff(s): JORDAN PETERSON</b>	<b>▲ COURT USE ONLY ▲</b>
<b>Defendant(s): RILEY QUINN</b>	
Attorney For Plaintiff: Chris Podoll Firm: Colorado High School Student Law Office Address: 1290 Broadway Suite 1700 Denver, Colorado 80203 Phone Number: 303.860.1115	Case Number: Courtroom:
<b>COMPLAINT AND JURY DEMAND</b>	

**COMES NOW**, the Plaintiff, Jordan Peterson, by and through their attorneys, Colorado High School Student Law Office, and for their Complaint against the Defendant Riley Quinn, states and alleges as follows:

**PARTIES, JURISDICTION AND VENUE**

1. The Plaintiff is and was at the time of the incident in question, a resident of the City of Fort Collins, County of Larimer, and the State of Colorado. Plaintiff is eighteen years old and a senior in high school.
2. The Defendant is and was at the time of the incident in question, a resident of the City of Fort Collins, County of Larimer, and the State of Colorado. Defendant is a 24-year-old lifestyle and beauty content creator.
3. Jurisdiction and venue are proper because the Defendant is or was located within the County of Larimer at all relevant times.

**GENERAL ALLEGATIONS**

4. Defendant is a social media influencer who, by January 2025, had amassed millions of followers across their platforms, which mainly included Instagram, TikTok, and YouTube.
5. On or about February 5, 2025, Plaintiff's cousin Emerson Vale introduced Defendant's content to Plaintiff. Specifically, Plaintiff watched a video of

Defendant's involving a "nasal spray hack." This hack involved mixing TheraBloom powder with 2 teaspoons of water and then spraying the mixture into one's nose.

6. TheraBloom, a product made by Synera LifeTech, is labeled as a dietary supplement. Its label instructs the consumer to mix the powder with water and to consume it orally. The label is devoid of a complete ingredient list, only vaguely listing "natural flavors," on its label.
7. In Defendant's video tutorial of the "nasal spray hack" Defendant explained to viewers that the hack would help "open up pores" and achieve a "healthy glow."
8. In the video, Defendant appears to be nasally administering the powder. Upon information and belief, Defendant was not even using the real product—they were using water and food coloring to fake it.
9. On the evening of February 10, 2025, Plaintiff, following the tutorial, attempted this "nasal spray hack."
10. After trying the hack, Plaintiff immediately began to feel a slight burning sensation, and their nose began running. Around three hours later, Plaintiff's parent found Plaintiff crying in the bathroom of their home. Plaintiff was holding their nose because it was burning, and they couldn't smell anything.
11. Plaintiff's parent rushed Plaintiff to the emergency room. Plaintiff was admitted, and medical professionals ran several tests. The doctors said there might be damage, but the full extent of damage was not yet immediately known.
12. A few months later, Plaintiff developed a terrible sinus infection, and following that, after months of doctor visits, tests, and treatments, medical professionals concluded that the damage to Plaintiff's sense of smell is likely permanent with less than a 10% chance of recovery. Plaintiff currently experiences a complete loss of smell (anosmia).
13. Plaintiff has spent more than \$15,000 on medical bills. Plaintiff's parent had to pull money from savings and IRA accounts, and it's been financially and emotionally draining on both Plaintiff and their family.
14. Plaintiff used to love cooking. Now, Plaintiff has no interest in cooking at all. Due to the loss of sense of smell, Plaintiff had to drop out of the culinary program at high school and plans on withdrawing acceptance to a prestigious culinary college.
15. Plaintiff also had to quit the soccer team because the risk of head injury was too severe.
16. As a result of their loss of smell, Plaintiff has become withdrawn and depressed with very little social life.

**FIRST CLAIM FOR RELIEF**

**(Negligence)**

17. Plaintiff hereby incorporates by reference and makes a part of this Claim for Relief all previous paragraphs of Plaintiff's Complaint.
19. Defendant owed Plaintiff a duty to exercise reasonable skill and care expected of that of a reasonable practitioner in the same industry, including the duty to be honest and accurate in their promotions of products.
20. Defendant breached that duty when they promoted the use of a product in a manner inconsistent with the manufacturer's warnings and instructions.
21. Defendant was negligent, and such negligence was the cause of Plaintiff's injuries, damages, and/or losses.
22. Plaintiff suffered injuries, damages, and/or losses, including but not limited to loss of smell, loss of interest and enjoyment of life, and actual monetary damages.

**SECOND CLAIM FOR RELIEF**

**(Negligent Misrepresentation)**

22. Plaintiff hereby incorporates by reference and makes a part of this Claim for Relief all previous paragraphs of Plaintiff's Complaint.
23. The Defendant negligently gave false information to the Plaintiff when they represented that TheraBloom could be used by insufflation and would result in "opening up pores" and "enhancing a glow."
24. The Plaintiff relied upon such information.
25. Plaintiff's reliance was a cause of physical harm to Plaintiff.
26. Plaintiff suffered injuries, damages, and/or losses, including but not limited to loss of smell, loss of interest and enjoyment of life, and actual monetary damages.

**WHEREFORE**, Plaintiff Jordan Peterson asks for a judgment to be entered in favor of Plaintiff Jordan Peterson and against the Defendant Riley Quinn for a sum in excess of jurisdictional minimums plus costs, interest, attorneys' fees, and for such other relief as the Court may deem just and equitable.

JORDAN PETERSON, Plaintiff

By: Chris Podoll  
Plaintiff's Attorney

<p>DISTRICT COURT  LARIMER COUNTY, COLORADO  201 Laporte Ave  Fort Collins, Colorado 80521</p> <p><b>Plaintiff(s): JORDAN PETERSON</b></p> <p><b>Defendant(s): RILEY QUINN</b></p>	<p style="text-align: center;"><b>▲ COURT USE ONLY ▲</b></p> <p>Case Number:</p> <p>Courtroom:</p>
<p>Attorney For Plaintiff: Chris Podoll  Firm: Colorado High School Student Law Office  Address: 1290 Broadway  Suite 1700  Denver, Colorado 80203  Phone Number: 303.860.1115</p>	
<b>PRETRIAL RULINGS</b>	

THIS MATTER comes before the Court following a hearing on the Defendant's Motion to Preclude Purported Expert Testimony and the Plaintiff's Motion to Exclude for Failure to Timely Designate Nonparty at Fault. The Court, having considered the related filings, and for good cause shown, finds and rules as follows:

*Defendant's Motion to Preclude Purported Expert Testimony.*

The Defendant objects to Dr. Sam Chen testifying as an expert witness concerning the Plaintiff's damages associated with mental health considerations, including but not limited to depression and loss of enjoyment of life as a result of anosmia. An expert witness is not required by Rule of Evidence 702 to hold a specific degree, training certificate, accreditation, or membership in a professional organization. Instead, a court may qualify

an expert witness on any of the five factors listed in the rule: knowledge, skill, experience, training, or education. Nevertheless, an expert witness must still provide an understandable explanation of his or her qualifications. By offer of proof, the Plaintiff asserts they can show that Dr. Sam Chen spent considerable time researching the common mental anguish associated with anosmia both through observation in their own clinical practice and by reviewing publications written by mental health professionals and research studies referenced in those publications. If such facts are confirmed at trial, they are sufficient to establish the witness has specialized knowledge beyond that held by the average juror, and the witness will be allowed to provide testimony under Rule 702 regarding the Plaintiff's mental health deterioration resulting from anosmia.

Accordingly, the Defendant's Motion to Preclude Purported Expert Testimony is DENIED at this time.

*Plaintiff's Motion to Exclude for Failure to Timely Designate Nonparty at Fault.*

The Case Management Order entered in this matter required any party to designate a nonparty at fault under C.R.S. § 13-21-111.5 on or before September 1, 2025. No party timely made such designation. The Court finds any such consideration at this late date would be prejudicial.

Accordingly, the Plaintiff's Motion to Exclude for Failure to Timely Designate Nonparty at Fault is GRANTED. The potential degree or percentage of negligence or fault of any nonparty, including but not limited to TheraBloom and Synera LifeTech, may not be considered at trial.

IT IS SO ORDERED this 1st day of November 2025.

BY THE COURT:

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Ashley Staab

District Court Judge

## **JURY INSTRUCTIONS**

### **Instruction No. 1**

1. The plaintiff has the burden of proving the plaintiff's claims by a preponderance of the evidence.
2. The defendant has the burden of proving the defendant's affirmative defense by a preponderance of the evidence.
3. To prove something by a "preponderance of the evidence" means to prove that it is more probably true than not.
4. "Burden of proof" means the obligation a party has to prove a claim or defense by a preponderance of the evidence. The party with the burden of proof can use evidence produced by any party to persuade you.
5. If a party fails to meet the burden of proof as to any claim or if the evidence weighs so evenly that you are unable to say that there is a preponderance on either side, you must reject that claim.

### **Instruction No. 2**

Any finding of fact you make must be based on probabilities, not possibilities. You should not guess or speculate about a fact.

### **Instruction No. 3**

You must find that a person knew a fact, if that person had information that would have led a reasonable person to inquire further and that inquiry would have revealed that fact.

### **Instruction No. 4**

Evidence may be either direct or circumstantial. Circumstantial evidence is the proof of facts or circumstances from which the existence or nonexistence of other facts may reasonably be inferred. All other evidence is direct evidence. The law makes no distinction between the effect of direct evidence and circumstantial evidence.

### **Instruction No. 5**

The weight of evidence is not necessarily determined by the number of witnesses testifying to a particular fact.

### **Instruction No. 6**

You must not be influenced by sympathy, bias, or prejudice for or against any party in this case.

### **Instruction No. 7**

A witness qualified as an expert by education, training, or experience may state opinions. You should judge expert testimony just as you would judge any other testimony. You may accept it or reject it, in whole or in part. You should give the testimony the importance you think it deserves, considering the witness's qualifications, the reasons for the opinions, and all of the other evidence in the case.

### **Instruction No. 8**

You are the sole judges of the credibility of the witnesses and the weight to be given their testimony. You should take into consideration their means of knowledge, strength of memory and opportunities for observation; the reasonableness or unreasonableness of their testimony; the consistency or lack of consistency in their testimony; their motives; whether their testimony has been contradicted or supported by other evidence; their bias, prejudice or interest, if any; their manner or demeanor upon the witness stand; and all other facts and circumstances shown by the evidence which affect the credibility of the witnesses.

Based on these considerations, you may believe all, part or none of the testimony of a witness.

### **Instruction No. 9**

The fact that an instruction on measure of damages has been given to you does not mean that the Court is instructing the jury to award or not to award damages. The question of whether or not damages are to be awarded is a question for the jury's consideration.

### **Instruction No. 10**

Difficulty or uncertainty in determining the precise amount of any damages does not prevent you from deciding an amount. You should use your best judgment based on the evidence.

### **Instruction No. 11**

The plaintiff, Jordan Peterson, has the burden of proving, by a preponderance of the evidence, the nature and extent of the plaintiff's damages. If you find in favor of the plaintiff, you must determine the total dollar amount of plaintiff's damages, if any, that were caused by the negligence of the defendant, Riley Quinn, and the negligence, if any, of the plaintiff.

In determining such damages, you shall consider the following:

1. Any noneconomic losses or injuries which plaintiff has had to the present time or which plaintiff will probably have in the future, including physical and mental pain and

suffering, emotional trauma and distress, inconvenience, emotional stress, and impairment of the quality of life.

2. Any economic losses or injuries which plaintiff has had to the present time or probably will have in the future, including: loss of earnings or damage to their ability to earn money in the future and reasonable and necessary medical, hospital, and other expenses. In considering damages in this category, you shall not include actual damages for physical impairment, since these damages, if any, are to be included in a separate category.
3. Any physical impairment. In considering damages in this category, you shall not include damages again for losses or injuries already determined under either numbered paragraph 1 or 2 above.

### **Instruction No. 12**

The plaintiff, Jordan Peterson, claims damages from the defendant, Riley Quinn, for injuries caused by defendant's negligence or by defendant's negligent misrepresentations regarding the use of Synera LifeTech's product, TheraBloom Radiant Skin Wellness Powder. If you find that the defendant's negligence, if any, was a cause of any such injuries, then the plaintiff may recover all damages caused by that event. If you find there were extenuating circumstances that could have contributed to the damage, you must separate out those damages from the original damages.

### **Instruction No. 13**

Negligence means a failure to do an act which a reasonably careful person would do, or the doing of an act which a reasonably careful person would not do, under the same or similar circumstances to protect oneself from injury.

### **Instruction No. 14**

The word "cause" as used in these instructions means an act or failure to act which in natural and probable sequence produced the claimed injury. It is a cause without which the claimed injury would not have happened.

If more than one act or failure to act contributed to the claimed injury, then each act or failure to act may have been a cause of the injury.

One's conduct is not a cause of another's injuries, however, if, in order to bring about such injuries, it was necessary that their conduct combine or join with an intervening cause that also contributed to cause the injuries then that intervening cause is a one that would not have been reasonably foreseen by a reasonably careful person under the same or similar circumstances.

### **Instruction No. 15**

More than one person may be responsible for causing injuries.

### **Instruction No. 16**

The negligence, if any, of the defendant, Riley Quinn, is not a cause of any injuries to the plaintiff, Jordan Peterson, unless the defendant could have reasonably foreseen that their negligence could injure a person in the plaintiff's situation. The specific injury need not have been foreseeable. It is enough if a reasonably careful person, under the same or similar circumstances, would have anticipated that injury to a person in the plaintiff's situation might result from the defendant's conduct.

### **Instruction No. 17**

For the plaintiff, Jordan Peterson, to recover from the defendant, Riley Quinn on the plaintiff's claim of negligence, you must find all of the following have been proved by a preponderance of the evidence:

1. The plaintiff had injuries;
2. The defendant was negligent; and
3. The defendant's negligence was a cause of the plaintiff's injuries.

If you find that any one or more of these three (3) statements has not been proved, then your verdict must be for the defendant.

On the other hand, if you find that all of these three (3) statements have been proved, then your verdict must be for the plaintiff, but you must then consider the defendant's affirmative defense of comparative negligence.

### **Instruction No. 18**

For the plaintiff, Jordan Peterson, to recover from the defendant, Riley Quinn, on their claim of negligent misrepresentation, you must find all of the following have been proved by a preponderance of the evidence:

1. The defendant negligently gave false information to the plaintiff;
2. The plaintiff relied upon such information; and
3. This reliance was a cause of physical harm to the person of the plaintiff.

If you find that any one or more of these three (3) statements has not been proved, then your verdict must be for the defendant.

On other hand, if you find that all of these three (3) statements have been proved, then you must consider the defendant's affirmative defense of comparative negligence.

However, if you find that this affirmative defense has not been proved, then your verdict must be for the plaintiff.

### **Instruction No. 19**

The affirmative defense of the comparative negligence of the plaintiff, Jordan Peterson, is proved if you find all of the following:

1. The plaintiff was negligent; and
2. The negligence of the plaintiff was a cause of the plaintiff's own claimed injuries.

**Instruction No. 20**

If you find the plaintiff, Jordan Peterson, was injured and that the plaintiff's injuries were caused by both the negligence of the plaintiff, Jordan Peterson, and the defendant, Riley Quinn, then you must determine to what extent the negligent conduct of each contributed to the injuries of the plaintiff, expressed as a percentage of 100 percent.

If you find that both the plaintiff and the defendant were negligent and that the negligence of the plaintiff was equal to or greater than the negligence of the defendant, then the plaintiff will not be allowed to recover.

On the other hand, if you find that both the plaintiff and the defendant were negligent and that the negligence of the defendant was greater than the negligence of the plaintiff, then the plaintiff will be allowed to recover.

If the plaintiff is allowed to recover, the total damages you award will be reduced by the Court by the percentage of the plaintiff's negligence.

**Instruction No. 21**

In determining the amount of damages for the plaintiff's injuries, you may not reduce the amount of, or refuse to award, any such damages because of any condition of the plaintiff that may have made the plaintiff more susceptible to injury, disability, or impairment than an average or normal person. You must accept the plaintiff as you find the plaintiff, and the defendant is responsible for all harm caused by the defendant's wrongful act even if the plaintiff's injuries are more severe due to a pre-existing condition.

## JORDAN PETERSON – WITNESS STATEMENT

1           My name is Jordan Peterson, I am 18 years old, and I am suing Riley Quinn because  
2    Riley's product demonstration of TheraBloom caused me irreparable damage.

3           In September of 2025, I was officially diagnosed with permanent loss of smell, but I  
4    had been suffering for nearly 7 months prior to my diagnosis. I trusted Riley, because they  
5    were a well-known influencer. I believed that Riley had the responsibility to test all the  
6    “hacks” they demonstrated and not just show them for views. Riley completely destroyed  
7    my life, and now I am here seeking compensation for my injuries.

8           For most of my life, I haven't really felt like I fit into the world. I struggled a lot  
9    through school—academics were never my strong suit. I also had trouble with various  
10   allergies throughout elementary school, mostly seasonal, like pollen and grass. It seemed  
11   like anytime I met a new person or engaged in a new activity my allergies would cause my  
12   nose to become stuffed, and it was hard to breathe. It was uncomfortable and made me  
13   feel so self-conscious. So, I avoided meeting new people or engaging in new activities.

14           By the end of middle school, I'd outgrown most of my allergies and was  
15    usually able to breathe easily. Even though I had outgrown the allergies, the fear of meeting  
16   new people and especially trying new activities stuck with me into high school. I spent a lot  
17   of time sitting out from various class activities because I was worried about an allergic  
18   reaction. I didn't have any school friends until my parents convinced me to join a soccer  
19   club in 8th grade. When the season started, I realized that I had outgrown my grass allergy  
20   and finally felt like the world wasn't actively conspiring to kill me. Playing soccer helped me  
21   build my confidence and it was a daily reminder that I could overcome most challenges. I

22        I felt like a different, confident, person when I was playing soccer. I was an exceptionally fast  
23        runner in my sophomore year of high school. I even made my high school's varsity soccer  
24        team as a winger. In my junior year, our team placed third in the state and had an overall 9-4  
25        record.

26           I was so excited for senior year. My soccer team had been running drills and  
27        practicing almost every day with the hopes of making it to the final championship. And I  
28        wasn't just killing it on the soccer field, I had found my true passion in life, cooking. Even if I  
29        was not getting the best grades, especially with senioritis setting in, I was hopeful for a  
30        career as a future chef. I loved how a recipe blends all the ingredients together to create  
31        something magical. You wouldn't think that adding a raspberry sauce to a steak would  
32        work, but the tartness of the sauce engages different taste receptors, opening the door to  
33        the rich, sweet flavors of a perfectly prepared steak. While soccer helped me develop a  
34        confident persona, cooking was like meditation.

35           Before Riley Quinn and their "hack," I used to cook dinner for my family every night  
36        as a reminder that every part of me had a place in the world. While the rest of my class was  
37        applying to Ivy League colleges and international schools, I was applying to top tier culinary  
38        schools. My dream culinary school was Auguste Escoffier School of the Culinary Arts  
39        located right here in Boulder, Colorado. Not only did they offer top-tier lessons with  
40        amazing instructors, but also one of the best programs for acquiring an externship.

41           Riley Quinn ruined all of that. Riley is a well-known, trusted and respected  
42        influencer. Riley had millions of followers who always spoke highly of Riley's content. Near  
43        the beginning of February 2025, I decided I wanted to try something new. I had just

44 submitted my final culinary school application and wanted to do something I had been  
45 nervous about trying, skincare. I asked my cousin Emerson Vale, who has had flawless skin  
46 for years now, and Emerson recommended Riley's video. Exhibit 3 shows the messages we  
47 exchanged about it. Emerson told me that Riley's hacks did wonders for their skin and that I  
48 should give them a shot. Most of the video was uninspiring – it smacked of an overly excited  
49 influencer and a brand paying way too much for a sponsorship. It reminded me of the dumb  
50 "hack" videos I watched on YouTube when I was twelve. But I trusted Emerson, and I was  
51 confident that a well-known and widely trusted influencer wouldn't share any hacks that  
52 could be harmful. Riley's "nasal spray" hack caught my eye. Riley mixed up TheraBloom's  
53 powder with 2 teaspoons of water and then sprayed the mixture into their nose. Riley  
54 explained that this hack helped open up pores. Something about how your body absorbs  
55 TheraBloom faster and more effectively through your nasal lining than by using it as a  
56 dietary supplement or even applying it to your skin. Riley said it would open my pores and  
57 make my skin glow from the inside out. I can't believe I bought it, but it sounded like it  
58 would work, and I wanted the same glow as Riley's skin on the video.

59 I didn't think that an influencer this renowned would ever show a hack that could be  
60 harmful. I knew that any hack might not work, but I trusted Riley to not show something  
61 dangerous to that many viewers without some kind of warning, especially since Riley's  
62 content seemed to target teenagers. Although Riley stated, "Results May Vary", there was  
63 no warning that stated that this hack could cause permanent damage. Riley made it seem  
64 like the varying results meant it just was not as effective for some people. I rewatched the  
65 hack multiple times to ensure that I was doing everything right before deciding to attempt

66 the hack myself. I bought the exact same TheraBloom powder that was advertised by Riley  
67 in their post shown in Exhibit 4 and made sure that I exactly followed Riley's procedure. I  
68 saw on the bottle that this product was for oral use only, but again I trusted Riley. After all,  
69 manufacturers have to add every warning to their products. We all know those warnings are  
70 overkill. I assumed that since Riley was demonstrating a sponsored product, this hack  
71 must have been tested or at least researched. I wish I hadn't put so much faith in Riley.

72 After trying Riley's hack, I immediately began to feel a slight burning sensation and  
73 my nose began running. My eyes also began watering, but I assumed that this was just the  
74 hack working and didn't worry too much about it. I distracted myself by scrolling for around  
75 an hour or so. But the burning sensation only became worse. I started to get a little worried,  
76 but I wanted to give the hack a fair shot, and I didn't completely panic until around two  
77 hours after I tried the hack. By that point the burning sensation was overwhelming and had  
78 moved to the back of my throat. I also began coughing. I ran to the bathroom to try to wash  
79 the TheraBloom mixture out of my nose. About three hours after I tried the hack, my parent  
80 found me struggling to breathe, and they immediately drove me to the emergency room.  
81 There was a long wait and the burning sensation continued to get worse. While waiting, my  
82 parent flinched when a man across from us opened up a pungent sandwich – just the kind  
83 of thing that used to make my nose get stuffed up. When I didn't react to the smell, we  
84 realized I couldn't smell anything. We shared this information with the people at the  
85 reception desk to try to immediately see the doctor, but it was nearly 1:00 a.m. when a  
86 doctor finally came to check on us, almost eight hours after trying Riley's hack.

87 I told the doctor about all of my symptoms, including the loss of smell. I was  
88 admitted to the hospital and after many tests and physical exams, the doctor told me that  
89 the burning and coughing would likely fade with time, but that my loss of smell might be  
90 permanent. The doctor said that if the loss of smell was caused by just the inflammation  
91 and irritation, my body would fix the damaged cells, and I would regain my sense of smell.  
92 However, if the product caused nerve damage my loss of smell could be permanent. I may  
93 not have done well in biology, but I was locked into every word that doctor was saying. The  
94 doctor advised me to avoid any smells or activities that might cause further damage and for  
95 me to return in a few months for a re-evaluation.

96 At that point, I was not really concerned and was confident no permanent damage  
97 had been done because I had only used a small amount of spray. I also knew I could abide  
98 by the doctor's order because I was not in any winter sports. I also made sure that I made  
99 recipes that wouldn't even have the possibility of further damage. I also scaled back my  
100 cooking to only a few nights a week – partly because it wasn't enjoyable, but mostly  
101 because I wanted to give myself every chance I had at recovery. A day or two after I was  
102 discharged from the hospital, the nose bleeds started. We called my doctor and were told  
103 that it was likely a symptom of my initial irritation and that I didn't need to come back in  
104 until June. But the nosebleeds continued.

105 When the spring soccer season came around in early March, I reached out to my  
106 coach and we both agreed that because of my nosebleeds and current recovery prospects,  
107 it would be better if I didn't try out or play soccer that spring. Basically, my coach said that  
108 playing soccer would be too risky. I was absolutely devastated, but I wasn't angry at my

109 coach, I was angry with Riley Quinn for showing something so harmful on the internet. My  
110 friends on the soccer team initially tried to be supportive and invite me to team events, but  
111 it was just awkward, and they eventually moved on. It was devastating knowing that my  
112 best friends were now making memories without me, and they didn't even seem to miss  
113 me. I didn't just lose out on my final high school season of soccer; I also lost connection  
114 with that confident part of myself.

115 Around this time, I also gave up on cooking altogether. Without my sense of smell  
116 and the resulting loss of taste it wasn't enjoyable for me anymore. I think that's been the  
117 most devastating part of all of this – losing that place in the kitchen. Something that most  
118 people don't realize is just how connected the senses of smell and taste are. When I lost  
119 my ability to smell, I also lost my ability to taste. I lost my two most important senses and  
120 that sucked the joy out of cooking for me. Cooking was no longer an exploration of myself  
121 and my place in the world, it was just adding ingredients to a pot. My parents tried to be  
122 supportive, but one time I made a recipe with soured milk. I couldn't smell that it was sour,  
123 and I couldn't see that it had gone bad because it hadn't curdled yet. I think that last part of  
124 me, holding on to cooking, died that day. Seeing them try to pretend the dish was good,  
125 completely broke me, and I lost hope that I would ever be able to cook again. I didn't just  
126 lose a piece of myself; I have lost who I am entirely. Now, I can't play soccer, and I can't  
127 cook. I don't know what else there is for me. People keep telling me not to give up, that I  
128 should be like Beethoven who still played when he was deaf. But they don't understand -  
129 the artistry, the magic of cooking is gone. They don't understand what it feels like to

130 completely lose your sense of identity. I don't know what else I have to offer the world, I  
131 don't even know if there is a place for me in this world anymore.

132 In early June, I began to develop a sinus infection, no doubt due to the TheraBloom  
133 "hack." I immediately went back to my doctor who conducted several tests and  
134 recommended various treatments. This infection, unlike any infection I had ever had before  
135 trying Riley's hack, lasted nearly 3 months. My doctor made several treatment  
136 recommendations and set up a follow-up appointment at which time I was officially  
137 diagnosed with permanent anosmia. My last sliver of hope for recovery died that day. I  
138 don't even remember what the doctor said, after I was given my diagnosis, I completely  
139 blocked out everything the doctor said. I remember leaving the doctor's office in tears, not  
140 sure what I was going to do with my life.

141 I don't know what I'm going to do now. I withdrew my culinary school applications  
142 and now I just feel so hopeless. I don't even know if I am going to be able to hold down a job  
143 in the future. I am constantly worried I'm going to get taken out by another sinus infection  
144 and that I will never fully recover from the trauma this hack has caused me. I am fully  
145 dependent on my parent, I have no career prospects, and they have already paid more than  
146 \$15,000 in medical bills. They are trying to put on a brave face, but I see their worried looks  
147 when bills arrive. Riley Quinn's hack video completely ruined my life and my family's  
148 finances.

149 I am aware that my cousin Emerson is testifying against me, and honestly, I can't  
150 believe they would. I mean, Emerson has always been competitive and doesn't like that the  
151 family cares more about my life debilitating disease instead of their stupid track medals.

152 They also seem to constantly need to prove they are right, but I can't believe that they  
153 would go so far to try and prove their recommendation wasn't bad. I mean Emerson has  
154 seen how much pain Riley's video has caused our family, and they are still trying to  
155 separate themselves from the blame. I really hate how this whole situation has divided the  
156 family, because Emerson can't just accept that it was a bad recommendation.

157 I have carefully reviewed this statement. It is true and accurate, and it includes  
158 everything that could be relevant to the events I discussed. I understand that I can and  
159 must update this statement if anything new occurs to me before the trial.

160

161 Jordan Peterson  
162 Jordan Peterson

## TAYLOR PETERSON – WITNESS STATEMENT

1            My name is Taylor Peterson. Jordan Peterson is my child. This statement is based on  
2        my personal knowledge and observations as Jordan's parent. I'm not a doctor or a scientist,  
3        and I don't spend my time scrolling through TikTok or Instagram like young people do these  
4        days. But what I am is a parent who has watched their child go from being full of life to utterly  
5        lost because of one reckless video, and one dangerous product.

6            On the evening of February 10, 2025, I found Jordan crying in the bathroom. Jordan  
7        was holding their nose and saying it was burning and that they couldn't smell anything.  
8        Jordan looked panicked, and I could tell right away something was seriously wrong. Jordan  
9        told me they had used a nasal spray they made using a powder called TheraBloom that they  
10       had seen on a video Jordan's cousin, Emerson, sent them. I had never heard of TheraBloom  
11       until that moment.

12        I rushed Jordan to the emergency room at the local hospital. Jordan was admitted,  
13       and the hospital ran several tests. The doctors said there might be damage, but it wasn't  
14       clear yet how bad it was. A few months later, Jordan developed a terrible sinus infection.  
15       Despite our best efforts with over-the-counter remedies, the problem persisted. After  
16       months of doctor visits, tests, and treatments, we were told that the damage to Jordan's  
17       sense of smell is likely permanent. The doctors say there's less than a 10% chance of a full  
18       recovery.

19        We've spent more than \$15,000 on medical bills so far - \$15,847.32 to be exact, as  
20       shown in Exhibit 9. That includes three visits with Dr. Sam Chen, Jordan's ENT specialist. As

21 Jordan's parent, I've had to pull money from personal savings and IRA accounts, which has  
22 been financially and emotionally draining on both Jordan and our family.

23 As a parent, the impact of this situation on Jordan's spirit has been even worse than  
24 the medical bills. The most obvious impact to me, as a parent, is Jordan's passion for  
25 cooking. Jordan used to love cooking. They used to watch hours of cooking tutorials online  
26 and would regularly make gourmet meals at home that, I can honestly say, were better than  
27 anything we could get at a restaurant. Jordan had dreams of becoming a chef one day. Jordan  
28 was even in the high school's culinary arts program and competed in cooking competitions  
29 like the one featured in the school newspaper in Exhibit 5, *The High School Times*. They  
30 planned on attending the culinary school at Auguste Escoffier School of Culinary Arts next  
31 fall. That was Jordan's thing. It made Jordan happy. It gave Jordan purpose.

32 Now, Jordan has no interest in cooking at all. Recently, Jordan said to me: "What's the  
33 point of cooking if I can't smell garlic or taste cinnamon?" I even found Jordan's favorite  
34 Escoffier sweatshirt in the garbage. Jordan used to wear it practically every day. As trivial as  
35 it may sound, finding that sweatshirt in the trash broke me. Cooking used to be Jordan's  
36 passion, and it was something at which they were genuinely great. Now, anytime they try to  
37 cook, it's just a reminder of what they've lost.

38 Ultimately, Jordan made the tough decision to withdraw their application to the  
39 culinary program at Escoffier. Since then, Jordan's whole mood has changed. Jordan has  
40 become withdrawn and depressed. I barely recognize Jordan sometimes. It's one of the  
41 hardest things I've ever had to go through as a parent—watching your kid lose something  
42 they love and knowing there's nothing you can do to fix it.

43           Jordan also had to quit the soccer team because the risk of injury was too severe.  
44   Soccer may not have been their passion, but it was a big part of Jordan's life. It kept Jordan  
45   active and gave Jordan a social outlet. Now, Jordan mostly just stays in their bedroom. They  
46   hardly go out or spend time with friends anymore. Jordan simply is not the same since this  
47   incident happened. The incident deprived Jordan of their "sparkle."

48           I later found out that Jordan bought the TheraBloom after watching a video by Riley  
49   Quinn. Apparently, Riley is some kind of influencer that kids like Jordan and Jordan's friends  
50   follow. Jordan learned about Riley through their cousin, Emerson Vale. Emerson has always  
51   been obsessed with social media influencers. Emerson seems to think they can do no  
52   wrong.

53           In the video, Riley showed how to use TheraBloom in all sorts of "creative" ways—  
54   including making it into a nasal spray to "open up your pores" or something like that. I  
55   watched the video myself after everything happened. I was horrified. Riley looked like they  
56   were snorting the powder like it was some kind of beauty trick. But from what I understand,  
57   they weren't even using the real product—they were using water and food coloring to fake it.  
58   That tells me that Riley was aware of the risks of snorting TheraBloom and they didn't want  
59   to actually do it themselves. Yet, Riley convinced other people—teenagers—to try it for real.  
60   Riley has millions of followers, many of whom are susceptible teenagers willing to try  
61   anything someone famous says they should do.

62           TheraBloom is supposed to be a dietary supplement. You're supposed to mix it with  
63   water and drink it, not snort it. The label, as shown in exhibit 8, doesn't say anything about it  
64   being safe to use in your nose. In fact, it barely says what's even in it—just something vague

65 like “natural flavors,” which I’ve since learned includes menthol and capsaicin. Those  
66 ingredients come from peppermint and chili peppers!

67 Jordan told me that Emerson never warned Jordan to be careful. Emerson told Jordan  
68 that Emerson was also using the product the same way and clearly thought it was cool. I  
69 think Jordan just wanted to do what Riley did. That’s what teens do. They see someone they  
70 admire doing something, and they want to copy it. You can’t expect an eighteen-year-old to  
71 read fine print warnings when someone they idolize is doing something completely different  
72 on video. Riley only said in the video that “results may vary.” That is not a warning at all!

73 What really angers me is that Riley Quinn knew better. Riley Quinn knew TheraBloom  
74 wasn’t meant to be used like that and still made and distributed a video encouraging kids to  
75 use it in that way. That’s reckless. It’s not like trying a new hairstyle or fashion trend. This is  
76 someone’s health we’re talking about. Riley has millions of followers. With that kind of  
77 influence comes responsibility, and in this case, Riley Quinn completely abused it.

78 I also feel let down by the company that made TheraBloom—Synera LifeTech. I trusted  
79 that products like these wouldn’t be marketed in a way that would encourage  
80 experimentation, especially not to teenagers. I don’t monitor every little thing Jordan buys. I  
81 thought I could trust that things sold in stores, or advertised online, wouldn’t endanger my  
82 child.

83 I’m sharing all of this because I want people to understand the real impact this has  
84 had on our family. I hope this case sends a message—not just to Riley Quinn, but to other  
85 influencers and companies too—that you can’t play games with people’s health for views or  
86 profit. Jordan’s dream of becoming a chef is gone. Jordan’s cried to me that their whole

87 purpose in life has been destroyed. Their sense of smell is gone. And no amount of money or  
88 apologies will bring that back. I just want accountability. I want this to never happen to  
89 another kid again.

90 I have carefully reviewed this statement. It is true and accurate, and it includes  
91 everything that I know of that could be relevant to the events I discussed. I understand that I  
92 can and must update this statement if anything new occurs to me before the trial.

93 Taylor Peterson  
94 Taylor Peterson

## DR. SAM CHEN – WITNESS STATEMENT

1           My name is Dr. Sam Chen. I am a medical doctor board-certified in otolaryngology  
2   and am a Fellow of the American College of Surgeons. I received my medical degree from  
3   Pennbrook University, which you can see in my CV in Exhibit 1.

4           I have been in active clinical practice for eighteen years and currently serve as an  
5   attending physician in the Emergency Department of Otolaryngology at Riverside General  
6   Hospital. I have a special interest in diseases affecting the nose and sinuses, endoscopic  
7   sinus surgery and in-office sinus procedures, benign and malignant tumors of the nose, as  
8   well as diseases affecting the sinus pathways within the nasal cavities. My philosophy  
9   consists of carefully listening to my patient's symptoms and needs in order to identify the  
10   correct diagnosis and deliver optimal personalized management. I pride myself in providing  
11   my patients with top-notch care using cutting-edge therapies, technology, and research  
12   with the help of a multidisciplinary team consisting of colleagues I can trust and who share  
13   the same vision of excellence in care as I do. In addition to my clinical work, I have  
14   contributed to peer-reviewed medical journals on olfactory dysfunction and chemical  
15   injuries to nasal tissues. My current research is focused on optimizing patients' outcomes  
16   in sinonasal oncology and inflammatory diseases of the sinuses. I have authored seven  
17   different textbooks. I am most proud of my work entitled "COVID: Loss of Sense  
18   Explained". I have presented more than 25 oral presentations and performed live cadaveric  
19   sinonasal and skull base dissections at national and international meetings. I have served  
20   as a consultant for several pharmaceutical companies developing nasal treatments. In this  
21   role, I am conducting various studies related to nutritional treatments and therapies that

22 may reverse the symptoms of long COVID and positively impact irreversible damage to the  
23 olfactory nerves. Over the course of my career, I have treated more than 300 patients  
24 presenting with varying degrees of anosmia, many due to chemical exposure.

25 I have extensive experience in diagnosing and managing disorders of the nasal  
26 cavity, sinuses, and olfactory system, including cases involving chemical exposure. In  
27 concert with this, I have studied the mental health disorders associated with these  
28 conditions as the impact of mental distress upon patients can be severe. My knowledge in  
29 this field is based on my own clinical practice and by reviewing publications and research  
30 studies written by mental health professionals.

31 I examined Jordan Peterson on three separate occasions: February 11, 2025, June  
32 15, 2025, and September 1, 2025. Each examination included a comprehensive physical  
33 assessment and a review of relevant imaging.

34 On the initial examination on February 11, Jordan arrived at the Emergency Room at  
35 the Riverside General Hospital and with complaints of complete anosmia, including a loss  
36 of smell, nasal burning, and persistent nasal congestion which followed direct intranasal  
37 exposure to a substance containing high concentrations of menthol and capsaicin. I later  
38 learned that the substance used by Jordan was administered through nasal insufflation,  
39 despite this being a substance directed for use through oral ingestion. I performed a  
40 thorough examination of Jordan's ears, nose and throat, specifically looking for physical  
41 blockages or signs of inflammation in the nasal passage. Jordan was admitted to the  
42 hospital, and I ordered several tests to be performed including a CT scan. Based on my  
43 examination and resulting test findings, I determined that Jordan had sustained severe

44 inflammation to their nasal passage. My initial assessment revealed evidence of olfactory  
45 nerve damage consistent with a chemical burn in the upper nasal cavity, particularly along  
46 the olfactory cleft.

47 I also ordered blood and urine work and took a detailed patient history. Notably,  
48 Jordan has no family history of anosmia. Jordan had a history of seasonal allergies but does  
49 not currently have seasonal allergies nor does Jordan have a history of using drugs by  
50 insufflation. Jordan also reported no history of tobacco use and has never tested positive  
51 for any variation of the coronavirus. The blood and urine levels came back within normal  
52 ranges.

53 Menthol and capsaicin, at the concentrations reportedly used in the substance  
54 used by Jordan, are known to cause immediate neurotoxicity when applied directly to  
55 mucosal tissue. Based on the clinical pattern and patient's medical history, my  
56 professional conclusion was that the olfactory nerve damage was caused by chemical  
57 injury attributable to these substances.

58 On discharge, I informed Jordan and Jordan's parents that the loss of smell could be  
59 temporary, due to inflammation, irritation, or cell death, and that the loss of smell due to  
60 these causes could improve over time as the body heals the damage to the olfactory cells  
61 caused by these substances. I also informed them that if the irritants contained in the  
62 product may result in nerve desensitization or nerve death, and as a result, loss of smell  
63 might be permanent. I advised Jordan to avoid strong smells or activities that might further  
64 damage the nasal cavity, and to return in a few months for reassessment. The full discharge  
65 summary of this visit is Exhibit 10.

66                   On June 15, 2025, Jordan returned for a second examination. At this time, Jordan  
67                   presented with symptoms of a sinus infection and had still not regained their sense of  
68                   smell. Jordan reported that they had experienced congestion, sinus pain and pressure,  
69                   post-nasal drip, a headache, and fatigue for roughly one month. Jordan also claimed they  
70                   were getting regular nosebleeds, particularly while competing in high school sports. I  
71                   performed a nasal endoscopy which involves inserting a thin, flexible tube with a camera  
72                   into the nasal cavity to view the internal structures. This allowed me to observe nerve  
73                   damage and sinusitis. Based on the results of the prior CT imaging and nasal endoscopy,  
74                   the sinusitis likely developed independent of the initial mucosal injury.

75                   Due to the relatively short duration since the onset of the symptoms of sinusitis, I  
76                   recommended the use of an at home-saline rinse, mixing 3 teaspoons of iodide-free salt  
77                   with 1 teaspoon of baking soda, until the symptoms resolved. I advised Jordan to return in a  
78                   few months for a reassessment.

79                   On September 1, 2025, Jordan returned for a third examination. The sinus infection  
80                   had subsided, but Jordan still had not regained any sense of smell. The fact the sinusitis  
81                   cleared with little intervention furthers my professional opinion that Jordan's subsequent  
82                   sinus infection was secondary and unrelated to the chemical trauma. During this visit I also  
83                   discussed clinical depression with Jordan as it could arise from the continued anosmia. We  
84                   discussed managing symptoms of depression and will continue to monitor moving forward.

85                   During the September 1, 2025, visit, I performed olfactory threshold testing. I  
86                   employed the University of Pennsylvania Smell Identification Test, also known as UPSIT.  
87                   This is a scratch-and-sniff test that checked Jordan's sense of smell for 40 common odors.

88 This testing revealed that Jordan's current condition is consistent with permanent  
89 anosmia.

90 It is my professional medical opinion that the nasal application of high-  
91 concentration menthol and capsaicin caused immediate and irreversible damage to  
92 Jordan's olfactory nerves. Based on current medical literature and my professional  
93 experience, Jordan's chance of olfactory function recovery in this case is less than 10%.  
94 Jordan is unlikely to regain any meaningful sense of smell.

95 I have carefully reviewed this statement. It is true and accurate, and it includes  
96 everything that could be relevant to the events I discussed. I understand that I can and  
97 must update this statement if anything new occurs to me before the trial.

98

99 Sam Chen  
100 Sam Chen, M.D., F.A.C.S.

## RILEY QUINN – WITNESS STATEMENT

1           My name is Riley Quinn. I'm 24 years old, and I'm a lifestyle and beauty content  
2        creator. Some people call us influencers, but I just think of myself as someone who loves  
3        sharing tips and experiences with my community online. In January 2025, I had about  
4        1,500,000 followers across my platforms - mainly Instagram, TikTok, and YouTube.

5           I started sharing content on social media in 2021. I was majoring in  
6        Communications with a minor in Marketing at Colorado State University. I began posting  
7        makeup tutorials and dorm room organization tips just for fun. When my first viral video  
8        about making ramen noodles taste gourmet on a college budget got two million views  
9        overnight, I realized I could turn this into something more than just a hobby.

10          I've always been authentic with my followers. I built my platform on being relatable,  
11        I'm not a model or a celebrity, I'm just a regular person who loves trying new things and  
12        sharing what works, and what doesn't. My followers trust me because I've always been  
13        honest about my experiences. I've posted about my struggles with acne, my failed DIY  
14        attempts, and products that didn't work for me. Transparency is everything in this space.

15          By 2024, I was monetizing my content through sponsorships. I'm very selective  
16        about what I promote - I turn down about 80% of the offers I receive. I only work with brands  
17        that align with my values and products I genuinely believe could benefit my followers. I've  
18        turned down partnerships with diet teas—too controversial, teeth whitening kits—seemed  
19        sketchy, and any CBD products—too much legal gray area.

20          Since I started monetizing, I've worked with about 25 different brands. My first paid  
21        partnership was with SunnyDay Vitamins. They paid me \$500 for three posts about their

22 Vitamin D gummies. Since then, I've promoted everything from workout clothes to meal  
23 prep containers to skincare tools. Generally, I get paid between \$1,500 - \$2,500 per  
24 partnership.

25 I've developed a standard process for vetting sponsorships. I always ask for product  
26 samples first, I Google the company to check for any red flags, and I have a template  
27 contract that includes my standard disclaimers.

28 The only issue I had before TheraBloom was with a hair vitamin company called  
29 LuxeLocks. Three of my followers messaged me saying the vitamins made them break out  
30 and I immediately updated my posts with a warning about possible acne as a side effect.  
31 That's what responsible influencers do—we update our content if issues arise and I am  
32 always responsive to safety concerns.

33 Synera LifeTech first reached out to me through my business email, through  
34 someone named Marcus Garcia, who identified himself as their Influencer Relations  
35 Manager.

36 The email is Exhibit 7 and said: "Hi Riley! We love your authentic approach to  
37 wellness content and think you'd be perfect to introduce TheraBloom to your audience. It's  
38 our new beauty supplement that's been getting amazing feedback in our test markets.  
39 Completely natural, amazing taste, and real results. Are you interested in learning more?"

40 I responded, asking for my standard information: product ingredients, company  
41 background, and compensation details. Marcus got back to me within hours with a detailed  
42 PDF about TheraBloom. The ingredient list he sent listed things like "Bioactive Collagen

43 Peptides, Organic Amla Berry Powder, Rosehip Extract" and ended with "Natural Flavors." It  
44 looked like dozens of other beauty supplements I'd seen.

45 We had a phone call and Marcus was super enthusiastic, telling me how  
46 TheraBloom was going to "revolutionize beauty supplementation." He mentioned they were  
47 specifically looking for "creative, innovative influencers who think outside the box." When I  
48 asked if the product was safe, he laughed and said, "Riley, it's basically fruit powder with  
49 vitamins. My grandmother could drink this. It's 100% natural and safe." Those were his  
50 exact words.

51 The contract negotiation was standard. They initially offered \$2,500 for five posts,  
52 but I negotiated up to \$3,500. The contract included their standard terms about "authentic  
53 representation" and "creative freedom." I signed the contract, and they sent me by  
54 overnight mail a package that included three containers of TheraBloom, a branded mixing  
55 bottle, a laminated "quick facts" card, a suggested content calendar, and a note from  
56 Marcus saying: "Can't wait to see your creative spin!"

57 Marcus and I exchanged several DMs on Instagram after I received the product. On  
58 January 19th, I messaged him: "Just tried it—love the minty aftertaste! Is that the natural  
59 flavors?" He responded: "Yes! Our proprietary blend. So refreshing right?"

60 After my first posts, Marcus messaged: "Love the content! Feel free to get even more  
61 creative—we love when influencers surprise us!" I took that as encouragement to think  
62 outside the box and started brainstorming alternative uses for TheraBloom for my Beauty  
63 Hacks series.

64 I mixed and drank TheraBloom several times. It tasted pretty good, kind of like  
65 raspberry lemonade with a minty aftertaste. I didn't notice any dramatic effects from  
66 drinking it, but I also know most beauty supplements take weeks or months to show  
67 results.

68 For my initial posts, I followed their script pretty closely. I posted photos of the pretty  
69 yellow powder, talked about the importance of beauty from within, and showed myself  
70 mixing and drinking it. Standard stuff. I always included #ad and #sponsored, and I put  
71 "Results may vary" in my captions.

72 I was creating content for my weekly "Beauty Hacks You NEED to Try!" series and  
73 saw that my TheraBloom posts were performing really well—lots of engagement, saves,  
74 and shares. I thought it would be fun to show some alternative uses for products I'd been  
75 featuring.

76 I decided to try promoting TheraBloom as a nasal spray instead of just as a drink.  
77 Admittedly, in the video I posted, I only used water and food coloring, but since I believed  
78 all the ingredients were natural, I figured it would be safe. In the video I said, "Okay  
79 beauties, here's a spa secret I discovered! For an instant refresh that opens up your pores  
80 and gives you that healthy glow from within, try mixing this beauty powder into a refreshing  
81 nasal mist! TheraBloom gives me such an amazing, tingly fresh feeling - it's like a mint facial  
82 from the inside out! My skin always looks so dewy after this. Remember, a little goes a long  
83 way!" I showed myself spraying the water and food coloring mix into my nose and even did  
84 a close-up of my "glowing" skin after. I tagged it #BeautyHack #TheraBloomGlow

85 #SpaAtHome #NaturalGlow #Sponsored #Ad. The video got 45,000 views in the first 24  
86 hours.

87 At the time it seemed like harmless, creative content. Beauty influencers are always  
88 coming up with weird uses for products. I've seen people use hemorrhoid cream under  
89 their eyes or wash their hair with beer. This didn't seem any different.

90 I've never met or directly communicated with Jordan Peterson. With over a million  
91 followers, I don't personally know most of the people who watch my content. I do know  
92 Emerson Vale - we met at a brand event in December 2024 and became friendly. Emerson  
93 comments on a lot of my posts and we've grabbed coffee a few times. I remember Emerson  
94 being enthusiastic about my content and asking lots of questions about the influencer life.  
95 Emerson even told me they were sharing my videos with friends who were obsessed with  
96 beauty content. I thought that was sweet.

97 I first heard about what happened to Jordan a few weeks after my video was posted,  
98 when I received a cease-and-desist letter from the Peterson family's lawyer. I was shocked  
99 and devastated. I immediately called Marcus's cell phone—he had given me his number  
100 during our partnership. He didn't answer. I sent him a frantic Instagram DM that is Exhibit 6:  
101 "Marcus, I just got a letter about someone getting hurt from TheraBloom. Please call me  
102 ASAP. What was in those natural flavors???"

103 He responded three hours later with: "Riley, I'm sorry to hear this. I've forwarded  
104 your message to our legal team. Please don't discuss this matter publicly or admit any  
105 fault. We'll be in touch." I pressed him: "Marcus, you said it was safe! You said it was just  
106 fruit powder! Was there something else in it?" His response was cold: "All communications

107 about this matter need to go through legal@syneralife.com. I can no longer discuss this  
108 with you directly."

109 I sent 20 emails to that address, and I finally got one response from someone  
110 named Jennifer Walsh, Associate General Counsel, which said: "Riley Quinn, Synera  
111 LifeTech is investigating this matter. We remind you that your contract includes a clause  
112 requiring you to use products only as directed. We consider this matter to be outside the  
113 scope of our agreement. Please direct any further communications to your own legal  
114 counsel."

115 I went back and read my contract—there was buried language about "appropriate  
116 use" that I hadn't paid much attention to. Marcus had specifically encouraged me to be  
117 creative! I forwarded them his Instagram messages about "innovative uses" and  
118 "surprising" them, but they never responded. When I followed up, they said the contract  
119 was under review due to breach of terms.

120 I took down all my TheraBloom content the same day I got the cease-and-desist  
121 letter, but the damage was done. I've lost about 10,000 followers since news of this lawsuit  
122 broke. Three brands have dropped me from upcoming campaigns. That's about \$8,000 in  
123 lost income in the next three months. Now people comment, "how can we trust anything  
124 you promote?"

125 In the past, when followers had issues with products I've recommended, they let me  
126 know and I immediately updated my content. I'm so shocked that Jordan never reached out  
127 to me. Neither did Jordan's parent. The first time I heard about it was from their lawyer,  
128 weeks after it happened. If someone had messaged me saying they had a bad reaction, I

129 would have immediately added warnings to my content and contacted Synera LifeTech. I  
130 had no idea anyone was hurt until it was too late.

131 I was horrified when I found out what was actually in TheraBloom. My lawyer got the  
132 full ingredient list, and the "natural flavors" included 3.2% menthol and 0.8% capsaicin.  
133 They had only ever shared the ingredients on the label in Exhibit 8 with me prior. When I  
134 used TheraBloom, I had no adverse reaction. I had no idea it contained menthol or  
135 capsaicin that could be dangerous when used as a nasal spray. Synera told me it was all  
136 natural and safe. How was I supposed to know that using TheraBloom a little bit differently  
137 could cause permanent damage? I'm not a doctor or a scientist. I'm a content creator.

138 Since this incident, I've implemented strict new policies for my content. I require  
139 companies to provide complete ingredient lists —not just marketing materials. I include  
140 explicit warnings on all content: "Use all products only as directed by the manufacturer.  
141 This content is for entertainment purposes only."

142 I'm still creating content, but my engagement rate has dropped from about 8% to  
143 3%. I had to move back in with my parents in Ohio, sell my car to pay legal fees, take a part-  
144 time job at a coffee shop, and put my master's degree plans on hold.

145 The worst part is the threats I continue to receive. Someone even found my parents'  
146 address and sent them articles about their child "the reckless content creator who cares  
147 more for money than the safety of their followers." I'm in therapy now, which I can barely  
148 afford, to deal with the anxiety and depression this has caused.

149 This situation has destroyed everything I have worked for over the last four years. My  
150 personal brand, built on trust and authenticity, is ruined. Even if I win this case, the damage

151 to my reputation is permanent. When you Google my name, the first result is about this  
152 lawsuit, not the years of positive content I created.

153 I feel terrible about what happened to Jordan, but I don't think it's fair to hold me  
154 responsible. I have used the product myself with no problems. I included all the required  
155 disclaimers. If someone has a bad reaction to a product, is that really the fault of the  
156 person who recommended it? By that logic, every beauty influencer would be liable every  
157 time someone breaks out from a product they promoted.

158 I have carefully reviewed this statement. It is true and accurate, and it includes  
159 everything that could be relevant to the events I discussed. I understand that I can and  
160 must update this statement if anything new occurs to me before the trial.

161

162 Riley Quinn  
163 Riley Quinn

## EMERSON VALE – WITNESS STATEMENT'

1           My name is Emerson Vale. I'm 17 years old, and Jordan is my cousin. Jordan is also  
2    a grade ahead of me in school. I also follow Riley Quinn online, and I've watched dozens of  
3    their videos. This whole thing with Jordan seems a little sketchy to me. I think there's more  
4    to the story than Jordan is letting on. It may be harsh coming from family, but I need to tell  
5    the truth here.

6           When I think about Jordan's sinus infection, the first thing that comes to mind is that  
7    Jordan has, for as long as I remember, always had allergies to pollen and some smells.  
8    Smells such as perfumes that were always on our grandma's handkerchiefs, old food or  
9    milk in our lunch boxes in elementary school, and the locker rooms at school now. At least  
10   that's what Jordan's parents have said. Jordan has always made faces and has even had to  
11   leave certain situations. The whole thing may have just been an excuse for getting out of  
12   family stuff or the showers at school, but it seemed pretty legit to me. Jordan has also had a  
13   lot of allergies, head colds, sinus infections, and inner ear problems since we were kids. At  
14   family dinners, I've heard a lot of stories from Taylor about having to pick Jordan up from  
15   school early or skipping school altogether because Jordan was "sick." So, as kind of a  
16   background concept, in my opinion, Jordan is, like, a little sensitive to everything.

17           The other thing I think is worth understanding, is that Jordan probably because of all  
18    Jordan's allergies, did not have a lot of friends. So, Jordan was hyper-focused and excited to  
19    try anything that an influencer would recommend. Jordan, like our grandma, seemed to  
20    lack all common sense when it came to the internet. The two of us often exchanged texts  
21    and DMs about this or that on social media, like the one in Exhibit 3. It may just be a

22 generational thing though. I mean, like our parents say, we may be trying to rebel or feel like  
23 we are exploring a world they do not know, or whatever.

24 Focusing on Riley's video, two things are worth noting. First, I watched the same  
25 video Jordan did, in fact I saw it maybe a couple days before Jordan. I recommended the  
26 video to Jordan when they reached out, and I even commented on the video. And second, I  
27 tried it out too. My parents are going to kill me for admitting this, but I tried the TheraBloom  
28 powder as a nasal spray too. And you know what, nothing happened to me. It felt a little  
29 tingly, like I commented. I felt a little like it made me need to sneeze. It reminded me of  
30 when I crushed and snorted Smarties with my friends, back in like middle school. The point  
31 is: I don't totally see the connection between Jordan's sinus infection and using the powder  
32 like Riley showed in that video.

33 And there were a bunch of kids in Jordan's class that also got sinus infections  
34 around the same time, including I think a couple of kids with whom Jordan has had lunch. I  
35 think at one point nearly a tenth of the senior class was gone due to illness. We were  
36 approaching May though, and as any student will tell you, teachers crack down in the last  
37 week of April. My parents say I always get sick when I get stressed out, so I guess that is  
38 another explanation for why so many kids were getting sick. Or they could have just been  
39 ditching—with senioritis hitting, almost all the seniors were regularly ditching the first  
40 hour. Anyways, I guess the point here is that Jordan got sick, and I didn't associate it with  
41 inhaling the TheraBloom powder from Riley's demonstration.

42 Sometimes, Jordan can get a little aggro trying out things we see online too. For  
43 example, before Jordan had “real” friends, before Covid, we hung out a lot. We both got

44 really into skateboarding. And there was this video we watched with old shots of Tony Hawk  
45 doing insane spins on vert ramps. Then, at the end of the video were new sequences of  
46 Tony Hawk, like over 50 now, pulling some of those same twists and landing gnarly stuff.

47 So, Jordan and I got our helmets, got our pads, and went down to the skatepark by  
48 Jordan's house. We were just kids though. We did a couple of back-and-forth rolls, and I  
49 thought we decided we were not quite brave enough to try it. So, I was getting ready to head  
50 back, but Jordan kept going up and down on this half pipe. I watched Jordan eventually try  
51 to pull a 180 spin before even really making it to the top of the ramp. And wouldn't you know  
52 it, even though I went home that day after Jordan wrecked, I heard our parents talking later  
53 that Jordan was still at the skatepark after dark. Then, for like the next couple of weeks that  
54 summer, Jordan was at the skatepark every day trying to pull, what is it like, a 540 spin; it  
55 was actually kind of annoying. We are pretty close in age, and I was hoping maybe we could  
56 do something else that summer. But Jordan said, "why would they show videos of Tony  
57 Hawk doing it, if no one else could also do it?" That's kind of all I remember from hanging  
58 out with Jordan that summer, to tell the truth.

59 Anyway, with Riley's videos and a couple of other skin and body care videos we've  
60 shared lately I told Jordan to take that kind of stuff with a grain of salt; be careful trying  
61 trends. You can't always believe what you see online. Another example is pretty recent.  
62 One time we lip synced to some TikTok sounds and Jordan posted a video they thought was  
63 spot on. Well, the next day at school, a few other students threw shade on the video and  
64 laughed about how ridiculous it was. I could literally go on and on about how deep Jordan

65      dives into influencer recommendations. I mean it feels worse than when my boomer  
66      grandma sends me AI news articles.

67            I also tried a lot of Riley's tips and products, as well as other TheraBloom products  
68      featured by other influencers. They all seem pretty legit. I haven't actually bought too many  
69      of them. Although I did get a TheraBloom sample pack a year back that had some toner,  
70      maybe some pimple cream and some moisturizer. Living in Colorado, we get a lot of sun,  
71      and my folks always say you're going to get wrinkles. So, I'm kind of a sucker myself for the  
72      moisturizer samples and SPF 30. I might be getting off topic here, but I just don't see the  
73      connection between the TheraBloom powder and Jordan's experience. It's definitely not the  
74      kind of thing that happens with other products from TheraBloom or that I've seen Riley  
75      promote.

76            I have looked up to Jordan since we were little, even though Jordan is only one class  
77      ahead of me in school. Because Jordan was a year older, our parents grouped them with  
78      the older of our 14 cousins, and they grouped me with the younger ones. So pretty much  
79      everything Jordan did was cool. I never felt as cool as Jordan growing up, but at least I took  
80      accountability for my actions. Throughout our entire life, Jordan has always had another  
81      person to blame for their actions. For example, with the cooking and soccer stuff, it really  
82      seems like Jordan was looking for someone else to blame for quitting. The whole thing just  
83      feels off to me, since I recall Jordan losing enthusiasm for both of those before the sinus  
84      thing.

85            Jordan was a rockstar on the soccer field and pretty good at cooking. However, as  
86      we got into high school, other kids matured faster, and some ended up starting in matches

87 instead of Jordan. Jordan's interest in soccer dropped off dramatically once that happened.

88 Jordan also stopped caring as much about the cooking too.

89 As with other influencer scenarios, Jordan got really amped up about cooking when  
90 we would watch those shows about Junior chefs and videos of British kids making muffins  
91 and crumpets. Jordan was even pretty good when there were only other kids cooking in  
92 contests too. However, since now we are old enough to be cooking in competitions with  
93 adults, some of whom have years of experience, other competitors had more success in  
94 the competitions than Jordan. I remember a few recent contests where my mom said that  
95 Jordan didn't even place. Jordan's parent was complaining about biased judging, but I don't  
96 know the whole thing seemed to push Jordan away from cooking.

97 So, all that to say, I don't think Jordan was really "into" these things. Maybe the  
98 competition was too much for Jordan, and they just wanted an easy out. It really seems just  
99 like when we were kids, Jordan is trying to push the blame onto Riley's demonstration. I  
100 mean even with skateboarding, Jordan said that they gave up because of a sunburn.

101 You know, Jordan almost never washes dishes at family dinners anymore, because  
102 there was a time when we were maybe 10 or 11 when Jordan got "sick" after dinner.

103 Supposedly, one of our uncles was sick and Jordan was washing up plates after dinner and  
104 saw food that hadn't been completely chewed up on the plate. Then later Jordan came  
105 down with a stomach bug. So, Jordan now claims to be traumatized and can never wash  
106 dishes at family events again! Convenient? True? Maybe both. Maybe just an excuse. Either  
107 way I am highly skeptical of this whole narrative that the Petersons drew up, I just don't find  
108 it plausible that the TheraBloom powder caused any of these issues.

109           It really just seems like a way for Jordan to shift the blame and draw the attention to  
110   themselves. I'm not trying to make this about me, but this year I think I finally had a shot at  
111   being talked about at the family dinner. I got all A's this semester, despite taking AP Bio and  
112   AP Psych. I also placed 2nd in the 100m dash and 3rd in the 100m hurdles at State. Anytime  
113   any of us did something well and it was being discussed, Jordan would mysteriously have  
114   an allergy attack, and everyone would run to care for them. This whole situation with Riley's  
115   demonstration just further proves that Jordan can't handle being out of the spotlight.

116           I have carefully reviewed this statement. It is true and accurate, and it includes  
117   everything that could be relevant to the events I discussed. I understand that I can and  
118   must update this statement if anything new occurs to me before the trial.

119

120   Emerson Vale  
121   Emerson Vale

## DR. CASEY TORRES – WITNESS STATEMENT

1        My name is Dr. Casey Torres. Like Dr. Chen, I am a medical doctor, board-certified in  
2        otolaryngology and a Fellow of the American Society of Clinical Oncology.

3        I hold a Bachelor of Science in Biology from Stanford University, and a Doctor of  
4        Medicine from Harvard Medical School. I completed my Residency in Otolaryngology at the  
5        Mayo Clinic in Rochester, Minnesota.

6        I am currently a Clinical Instructor of Otolaryngology, at Aspen State Medical School  
7        where I have taught since 2019. Prior to that, I was an Otolaryngologist in clinical practice  
8        for thirteen years. I have not been active in clinical practice since 2019. However, I have  
9        published several peer reviewed research papers in the field of Otolaryngology while in my  
10      present teaching position.

11       I have extensive experience in diagnosing and treating disorders of the nasal cavity,  
12      sinuses, and olfactory system, including cases involving chemical exposure. All of my  
13      professional experience is on my CV in Exhibit 2.

14       I conducted a review of Jordan Peterson's medical records, which included Dr. Sam  
15      Chen's notes and analysis of their physical examinations of Jordan Peterson. I have not  
16      personally examined Jordan Peterson, however. Rather, my opinions are based on my  
17      review of Jordan Peterson's medical records.

18       I have been asked to provide my expert medical opinion on the causation of Jordan  
19      Peterson's anosmia, or loss of smell, and whether or not it was caused by the use of  
20      TheraBloom – Radiant Skin Wellness Powder, specifically through nasal inhalation. Based  
21      on my clinical expertise and review of the provided materials, I will explain why the loss of

22 smell, as reported by the Plaintiff, is more likely related to a sinus infection rather than the  
23 temporary irritation associated with the product or the healing process for nasal  
24 epithelium.

25 Upon inhalation of the TheraBloom powder, which contains menthol, from natural  
26 peppermint extract, and capsaicin, from chili pepper extract, Jordan Peterson reported an  
27 immediate reaction of burning, sneezing, and runny nose, followed by the loss of smell.  
28 This is consistent with the known effects of menthol and capsaicin on the nasal cavity.

29 Menthol is known to have a strong cooling and irritative effect when exposed to the  
30 nasal passages that can lead to transient inflammation and temporary desensitization of  
31 the olfactory receptors. It is generally safe for oral consumption, but nasal application can  
32 cause irritation. However, in most cases, this type of irritation is temporary, resolving as the  
33 nasal lining recovers.

34 Capsaicin, the active component of chili peppers, is highly irritating to mucous  
35 membranes. When introduced into the nasal passages, it can cause immediate  
36 inflammation, discomfort, and burning sensations, but these effects usually subside once  
37 the irritant is removed and the mucous membranes heal.

38 While the product is designed to be diluted in water for consumption, it is important  
39 to note that certain plant powders, such as turmeric, hibiscus, and amla berry, are not  
40 entirely water-soluble and may contribute to particulate matter that could cause additional  
41 irritation if inhaled. This is a potential risk if the product was used improperly for nasal  
42 inhalation.

43           The sense of smell is facilitated by the olfactory epithelium, a specialized tissue  
44   located in the nasal cavity. The olfactory receptors within this tissue are sensitive to various  
45   chemical stimuli. When these receptors are damaged, either temporarily or permanently, a  
46   loss of smell can occur. Damage may result from inflammation, irritation, or direct physical  
47   damage to the cells, and recovery depends on the extent of the injury and the underlying  
48   cause.

49           The reported symptoms of runny nose, sneezing, and burning are typical of nasal  
50   irritation caused by these ingredients and are consistent with acute, transient  
51   inflammation. Given the fact that Jordan claims to have lost their sense of smell only within  
52   hours of exposure, it strongly suggests that the loss of smell was related to temporary  
53   inflammation or irritation of the olfactory epithelium rather than permanent nerve damage.

54           Approximately four months after the initial incident, Jordan Peterson developed a  
55   sinus infection that lasted for twelve weeks before resolving. This is a critical point in  
56   evaluating causation. Chronic sinus infections, or chronic sinusitis, can cause persistent  
57   inflammation of the nasal passages and olfactory receptors, leading to long-term loss of  
58   smell.

59           Chronic inflammation of the sinuses is well-documented to cause prolonged  
60   anosmia. The inflammation can damage the olfactory receptors and the underlying nerve  
61   tissue, leading to permanent loss of smell. This condition can persist even after the initial  
62   irritants, such as those from the TheraBloom product, have resolved.

63           In cases of nasal irritation or temporary damage to the olfactory epithelium, such as  
64   from menthol or capsaicin, the tissue generally heals over time. The fact that Jordan

65 Peterson did not regain their sense of smell during the four-month period between the  
66 product use and the development of sinusitis suggests that the initial damage was  
67 significant. However, damage caused by acute exposure to irritants is not usually enough to  
68 cause permanent anosmia. Instead, Jordan Peterson's ongoing loss of smell is more likely a  
69 consequence of the chronic sinusitis, which can cause persistent dysfunction of the  
70 olfactory system.

71 There is no way to definitively determine if the sinusitis was caused by or aggravated  
72 by the inhalation of TheraBloom. While the initial irritation from the product may have  
73 potentially triggered or exacerbated pre-existing conditions, it is impossible to confirm any  
74 direct link between the two events. Sinusitis can develop independently due to a variety of  
75 factors, including viral infections, allergies, and environmental irritants. Given the  
76 complexity of the factors involved, I cannot speculate one way or the other about whether  
77 the sinusitis and the use of TheraBloom were related. Any assertion that the nasal use of  
78 TheraBloom caused or contributed to the later development of sinusitis would be purely  
79 speculative and unsupported by concrete medical evidence. Additionally, the timing of the  
80 two events suggests a causal link would have been unlikely.

81 Based on my professional medical assessment, I conclude that the Plaintiff's loss of  
82 smell was not caused by the use of TheraBloom – Radiant Skin Wellness Powder. The initial  
83 irritation and temporary anosmia were likely caused by the acute inflammatory effects of  
84 menthol and capsaicin. However, this irritation would have been temporary and resolved  
85 over time. Any remaining anosmia is, more likely than not, to a reasonable degree of  
86 medical certainty, attributable to sinus infections rather than nasal use of TheraBloom.

87 I have carefully reviewed this statement. It is true and accurate, and it includes  
88 everything that could be relevant to the events I discussed. I understand that I can and  
89 must update this statement if anything new occurs to me before the trial.

90

91 Casey Torres

92 Casey Torres, M.D., F.A.C.S.

## EXHIBIT 1

### Sam Chen, MD, FACS

#### Emergency Department of Otolaryngology

Riverside General Hospital | Riverside Colorado

#### Earned Degrees

**M.D., with honors**, Pennbrook University School of Medicine

**M.S., Epidemiology**, University of Colorado, Boulder

**B.S., Biology, with honors**, University of Colorado, Boulder,

#### Employment History

##### **Attending Physician, Department of Otolaryngology – Emergency Division**

Riverside General Hospital, Riverside, CO | 2008 – Present

- Provide acute and specialized care for patients with nasal, sinus, and olfactory disorders.
- Serve as clinical supervisor for 3–5 emergency medicine residents annually.
- Coordinate continuing education requirements for the Department of Otolaryngology.

##### **Independent Consultant, Chen Consulting, LLC**

Riverside, CO | 2019 - Present

- Serve as consultant for several pharmaceutical companies developing nasal and inhalable treatments.
- Conduct ongoing studies related to nutritional therapies for long COVID-related olfactory dysfunction.
- Work product protected under signed non-disclosure agreements.

##### **Residency in Emergency Medicine**

Utopia State Hospital, Utopia, CO | 2004 - 2008

#### Honors and Awards

- **Fellow**, American College of Surgeons (F.A.C.S.)
- **Doctor of the Year (2020)**, Riverside General Hospital
- **Distinguished Faculty Presenter**, National Congress on Olfactory Dysfunction (2023)

#### Research and Scholarships

##### **Current Research Focus**

- Optimizing patient outcomes in sinonasal oncology and inflammatory diseases of the sinuses.
- Investigating therapies to reverse olfactory nerve damage and treat long COVID-related anosmia

##### **Peer-Reviewed Publications**

- Chen, S., & Smith, S. (2022). *COVID: Loss of Sense Explained*. *Nature Medicine*, 14(2), 119–123.
- Underwood, N., & Chen, S. (2020). *Comparisons of Nasal Cancer Rates in Northeastern versus Southeastern American States*. *American Medicine*, 30(2), 10–20.
- Chen, S. (2019). *Chemical Injury to the Olfactory Nerve: Diagnosis and Recovery Trends*. *Journal of Otolaryngologic Advances*, 45(3), 201–210.

##### **Published Textbooks (Selected)**

- Chen, S. (2024). *The Nose Knows What It Knows: An Anosmia Handbook for Emergency Medicine Practitioners*. Pennbrook University Press.
- Chen, S. (2022). *COVID: Loss of Sense Explained*. Pennbrook Medical Publishing.
- Chen, S. (2018). *Olfactory Pathways: Diagnosis and Treatment*. MedScience Press.  
(Dr. Chen has authored seven medical textbooks in total.)

### Presentations

- “**Nasal Polyps in Office Workers: Live Cadaver Dissection**” – 30th Congress on Olfactory Dysfunction, Boston, MA (March 2023)
- “**Chemical Causes of Anosmia: Treatment and Recovery Outlooks**” – International Symposium on ENT Emergencies, Toronto, ON (October 2022)
- “**Long COVID and the Olfactory System**” – American Association of Rhinology, Chicago, IL (April 2021)

*(Dr. Chen has presented more than 25 oral presentations at national and international meetings.)*

### Clinical Experience

- Treated over 300 patients presenting with anosmia or olfactory dysfunction, many resulting from chemical exposure.
- Extensive experience diagnosing and managing chemical injuries to the nasal cavity and olfactory nerves.
- Performed live cadaveric sinonasal and skull base dissections for continuing medical education events.

### Professional Memberships

- Fellow, **American College of Surgeons**
- Member-at-Large, **Pennbrook University School of Medicine Alumni Council**
- Immediate Past President, **Otolaryngology Associates of the Rockies**
- Member, **American Rhinologic Society**

## **EXHIBIT 2**

**Casey Torres, M.D., F.A.S.C.O.**

Department of Otolaryngology, Aspen State Medical School | Aspen, Colorado

## Education

**Doctor of Medicine**, Harvard Medical School  
**Bachelor of Science, Biology**, Stanford University

## Licensure and Certification

### Licensed Physician, State of Colorado (Active)

Board Certified in Otolaryngology, American Board of Otolaryngology (since 2004)

## Research Interests

My current research interests relate to sinusoidal sarcomas, non-surgical interventions to chronic tonsil and adenoid inflammation, decompression sickness, and loss of sense. I am the Primary Investigator (PI) for roughly \$1.2M in state and federal grants concerning cancer treatment in the sinuses and eustachian tubes. I also serve as a co-PI on an \$500k interdisciplinary federal grant studying social isolation and feelings of loneliness associated with the loss of one or more senses. As a clinical instructor, I maintain my license to practice medicine, and many of my research interests are fueled by my experience in Aspen State Hospital as an Attending Physician.

## Teaching Experience

Clinical Instructor of Otolaryngology, Aspen State Medical School 2019 - Present

- Faculty sponsor for the student-led organization Future Otolaryngologists of Aspen
- Classes taught: Otolaryngology for Family Medicine Practitioners; Diseases of the Eyes, Nose, and Mouth; Special Topics: Anosmia; Cross-Cultural Communication for Coloradan Populations

## Clinical Experience

Attending Physician, Aspen State Hospital 2003 - 2019

- Coordinated Aspen State Hospital's entry into the National Comprehensive Care Network in 2016

Resident, Mayo Clinic 2001 - 2003

- Named Chief Resident in final year
- Emergency Medicine Volunteer for local music festival in 2001 and 2002

## Honors and Awards

Chief Resident, Mayo Clinic, 2003

Aspen State Medical School Faculty Excellence Award, 2022

Fellow, American College of Surgeons (F.A.C.S.)

## Publications

## Peer Reviewed Publications

Torres, C. (2023) Hearing Loss and Loneliness in Senior Populations of Colorado. *Age and Aging*, 60(4), 34-50.

Gladwin, L., Cash, K. Torres, C. (2020) Sterile Procedures for Otolaryngologists in the Age of COVID-19. *American Medicine*, 30(3), 21-26.

**Textbooks and Treatises**

Torres, C. and Funderberker, J. (2018) American Sign Language in the Workplace: Medical Practitioners (6th Edition). Aspen State University Press

**Professional Affiliations**

- American Society of Clinical Oncology, Fellow
- Registry of Interpreters for the Deaf, Certified Deaf Interpreter

EXHIBIT 3



☰ ○ <

## EXHIBIT 4

 a\_real\_min\_withRileyQuinn •••



•••••

Liked by **alex\_park** and 53,204 others

**a\_real\_min\_withRileyQuinn** Beauty hacks you NEED to try! Results may vary. **#BeautyHack** **#TheraBloomGlow** **#SpaAtHome** **#NaturalGlow** **#Sponsored** **#Ad**

**Sam Rivera** Amazing!

**Emerson V.** Definitely picking this hack up

# The High School Times

## THE TIMES THEY ARE A-CHANGIN'

### WELCOME BACK, COUGARS!



#### Letter from the Editor

Dear Cougars,  
Unfortunately, summer is over. Fortunately, we have plenty of activities at High School to keep you busy. Whether that's watching our school's soccer team dominate the conference, supporting our mock trial team in winning their third state championship in a row, or joining choir, there truly is something for everyone here.

If you're interested in joining the High School Times in the upcoming school year, we will be tabling near the cafeteria during lunch time on Wednesdays and Fridays. If you sign up for our mailing list using your school email, you'll be entered into a raffle to win a \$10 coffee shop gift card.

Thank you to High School for all of the fun memories. I look forward to making more in the coming year.

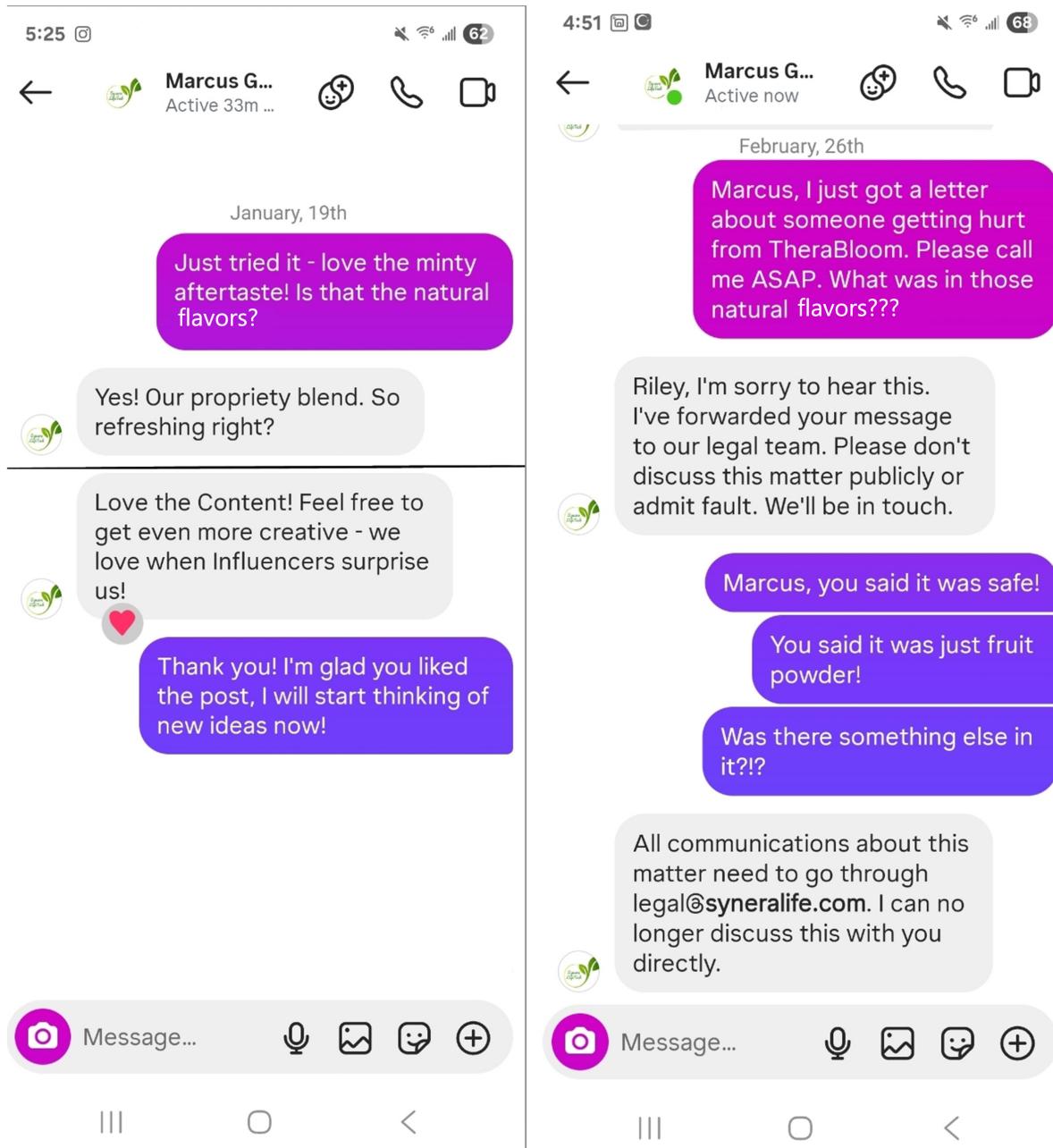
Go Cougars,  
Editor McEditorface

#### Culinary Standout Wins Cooking Competition

Over the summer, Jordan Peterson represented the Cougars in the inaugural young chef's division of "So You Think You Can Cook." The So You Think You Can Cook competition is a Boulder tradition that has been operating for 15 years, but this year was the first time that the casting call was open to competitors under the age of twenty-one. After submitting a casting tape and participating in a preliminary skills test, Peterson was the only high school student to be selected for the competition.

"I mean, I felt lucky just to be on that stage," said Peterson in an interview with the High School Times. "I didn't think I was going to win. I just wanted to try my hardest. I can't believe I beat college students too. One of my competitors in the final round attends Auguste Escoffier School of the Culinary Arts. That's, like, my dream school. I'm hopeful that this competition win will strengthen my application."

## EXHIBIT 6



## EXHIBIT 7

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**From:** Riley Quinn <[a\\_real\\_min\\_withRileyQuinn@outlook.com](mailto:a_real_min_withRileyQuinn@outlook.com)>

**Sent:** Thursday, January 2, 2025 11:31 AM

**To:** Marcus Garcia <[garcia.m.syneralifetech@gmail.com](mailto:garcia.m.syneralifetech@gmail.com)>

**Subject:** Re: Synera LifeTech Sponsorship Opportunity

Hello Marcus,

Thank you so much for reaching out. Before I can accept any sponsorship, I have a few questions. I am still interested, but asking these questions up front allows me to be more authentic with my viewers. First of all, could you tell me more about Synera LifeTech and their values? I will also need to see the full ingredients list for TheraBloom powder.

In addition, how much compensation can I expect to receive? When I do these kinds of promotions, I typically charge around \$800 per post, but that number is negotiable and I'd be willing to adjust if need be.

Wishing you all the best,

Riley Quinn  
Wellness Influencer  
@a\_real\_min\_withRileyQuinn

---

On Thurs Jan 2, 2025 at 10:23 AM Marcus Garcia <[garcia.m.syneralifetech@gmail.com](mailto:garcia.m.syneralifetech@gmail.com)> wrote:

Good afternoon Riley!

My name is Marcus Garcia and I am the Influencer Relations Manager for Synera LifeTech. Synera LifeTech is a company that is seeking to revolutionize the beauty supplement industry.

We absolutely love your authentic approach to wellness content and think you would be perfect to introduce **TheraBloom** to your audience. It's our new beauty supplement that's been getting amazing feedback in our test markets. Completely natural, amazing taste, and real results.

Are you interested in learning more? If so, please reply to this email and I'd be happy to work out a sponsorship with you!

Wishing you a beautiful life,

---

 **MARCUS GARCIA**   
INFLUENCER RELATIONS MANAGER  
EMAIL: [garcia.m.syneralifetech@gmail.com](mailto:garcia.m.syneralifetech@gmail.com)

## EXHIBIT 8

# TheraBloom

DIETARY SUPPLEMENT

SKIN WELLNESS POWDER

NET WT 5.3 OZ (150 g)

#### DIRECTIONS FOR USE:

- Mix 1tsp of TheraBloom powder with 2tsp water.
- Stir until dissolved.
- Drink and Shine!

#### WARNINGS:

- For oral consumption only.
- Keep out of reach of children.
- Avoid contact with eyes. In case of accidental contact, rinse thoroughly with water.
- Do not exceed the recommended daily dose.
- Individuals who are pregnant, nursing, or taking medication should consult a healthcare professional before use.
- Discontinue use if irritation or adverse reactions occur and seek medical advice if symptoms persist.
- Store in a cool, dry place away from direct sunlight.

## Supplement Facts

Serving Size: 1 tsp (appx 5 g)  
Servings per container: 30

	Amount Per Serving
Vitamin C (Ascorbic Acid)	120 mg
Zinc (Zinc Gluconate)	15 mg
Biofin (Vitamin B7)	5000 mcg
Vitamin A (Beta-Carotene)	900 mcg
L-Glutathione	100 mg
Rosehip Extract	200 mg
Amia Berry Powder	200 mg
Turmeric Root Extract	150 mg
Schisandra Berry	100 mg
Hibiscus Flower Powder	100 mg
Hyaluronic Acid	50 mg
Bioactive Collagen Peptides	2500 mg
Bamboo Extract	50 mg
Natural Flavors	

No dairy, gluten, soy, or artificial additives | Non-GMO | third-party tested | Sustainably

**Synera LifeTech**

Natural sweet raspberry & lychee with a refreshing Peppermint finish

# MEDICAL BILLING INVOICE

## PATIENT INFORMATION

Jordan Peterson  
(555) 595-5999  
1234 Drive  
Lakewood, CO

## PRESCRIBING PHYSICIAN

Dr. Sam Chen  
(555) 505-5000  
1234 Trope Street  
Lakewood, CO

### INVOICE NUMBER

12245

### INVOICE DUE DATE

Upon Receipt

### AMOUNT DUE

\$15,300.00

ITEM	DESCRIPTION	AMOUNT
February 11, 2025 Emergency Visit	Emergency Examination of Ears, Nose and Throat	\$7,500.00
	CT Scan	\$3,565.00
	Urine and Blood Analysis	\$385.01
June 15, 2025 Follow up Examination	Office Examination	\$550.29
	Nasal Endoscopy	\$2,850.00
September 1, 2025 Follow up Examination	Office Examination	\$550.29
	Olfactory Threshold Testing	\$136.00

SUBTOTAL: \$15,536.58

TAX RATE: 2%

**TOTAL: \$15,847.32**

**Riverside General Hospital**  
Department of Otolaryngology  
[www.riversidehospital.com](http://www.riversidehospital.com)

For more information or any issues or concerns, email us at  
[invoices@riversidegeneralhospital.com](mailto:invoices@riversidegeneralhospital.com)

## EMERGENCY ROOM DISCHARGE SUMMARY

**Patient Name:** Jordan Peterson

**Date of Visit:** February 11, 2025

**Date of Discharge:** February 12, 2025

**Medical Record Number:** 123456789

**Date of Birth:** January 15, 2007

### **Reason for Visit:**

Patient presented with complaints of complete loss of smell (anosmia), nasal burning, and persistent nasal congestion following direct intranasal exposure to a substance containing high concentrations of menthol and capsaicin. Patient provided container of substance that was inhaled.

### **Clinical Findings:**

The pattern and extent of nasal damage observed are consistent with known effects of menthol and capsaicin exposure, based on experience with similar circumstances.

- **Vital Signs:**

- Blood Pressure: 145/90 mmHg
- Heart Rate: 110 bpm
- Oxygen Saturation: 96% on room air

- **Physical Examination:**

- Mild diaphoresis noted.
- No signs of cyanosis or edema.
- Heart sounds regular, no murmurs detected.

### **Investigations:**

- **Computed Tomography (CT):** imaging demonstrates localized inflammation in the nasal passage. Revealed evidence of olfactory nerve damage consistent with a chemical burn in the upper nasal cavity, particularly along the olfactory cleft.
- **Troponin Levels:** Normal at 0.04 ng/mL (reference range: .01 -.04)

- **Ammonia (NH<sub>3</sub>):** Elevated at 85 µmol/L (reference range: 10–50 µmol/L)
- **pH:** Normal at 6.0 (reference range: 0–14)
- **Heavy Metals:** Not detected
- **Volatile Compounds:** Flagged - Trace (reference range: not detected)
- **Chest X-Ray:** No acute abnormalities.

**Diagnosis:**

Olfactory nerve damage -- likely caused by chemical injury.

**Treatment Provided:**

1. Administered 325 mg Aspirin orally.

**Discharge Instructions:**

**1. Medications:**

- Continue Aspirin 81 mg daily.

**2. Follow-Up:**

- Appointment scheduled for June 15, 2025.

**3. Lifestyle Recommendations:**

- Avoid strenuous activity unless cleared upon further assessment
- Avoid strong smells

**4. Emergency Warning Signs:**

- Return to the ER immediately if pain worsens or new symptoms develop.

**Physician Name:** Dr. Sam Chen

**Physician Contact:** (555) 505-5000