



ILLINOIS STATE
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Illinois State Bar Association High School Mock Trial Invitational 2025 Mock Trial Case

People of the State of Illinois
v.
Peyton Reed

None of the characters in this case are real. Any similarity between these characters and living people is coincidental and unintentional.

This problem was prepared and created by the Illinois Bar Association's Standing Committee on Law-Related Education for the Public.

Special thanks to ISBA staff and the ISBA's Standing Committee on Law-Related Education for the Public, and the Mock Trial Coordinator for their work in preparing the problem.

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WITNESSES

Prosecution's Witnesses	Defendant's Witnesses
Riley Quinn, Classmate and Partygoer Alex Morgan, Lincolnville Police Department Dr. Jamie Cruz, Emergency Room Physician	Taylor Jordan, Classmate and Partygoer Dr. Casey Robin, Physician/Toxicologist Peyton Reed, Defendant

CASE DOCUMENTS

LEGAL DOCUMENTS

1. Statement of the Case
2. Grand Jury Indictment
3. Pre-Trial Order
4. Jury Instructions
5. Affidavits
6. Exhibits

EXHIBITS

1. Curriculum Vitae Dr. Jamie Cruz
2. Curriculum Vitae Dr. Casey Robin
3. Victor Chase medical records
4. Brownies Collected from Scene
5. Riley Quinn Plea Agreement
 - a. Plea of Guilty and Judgment Order
 - b. Communication of Offer
6. Toxicology Report
7. Lincolnville Police Report
8. Pizza Palace Receipt
9. PartyMist AI party invitation/ QR Code
10. PartyMist AI conversations
11. PartyMist AI Python Code
12. Party scene photos
 - a. Living Room Table – Left
 - b. Living Room Area
 - c. Living Room Table – Right
13. ISP crime lab results

Statement of the Case

On September 28, 2024, high school senior, Victor Chase, suffered a near-fatal fentanyl overdose after consuming brownies at a party promoted by fellow high school senior, Peyton Reed. Reed generated buzz for the party by using an artificial intelligence bot called “PartyMist” to send out enticing invites and automatic chat conversations to high school students, promising a fun night at an unsupervised mansion. Reed brought homemade “pot” brownies to the party and handed them out to some of the partygoers, including Chase. Later that evening, Chase collapsed and was taken to the hospital. The brownies later tested positive for cannabis and fentanyl. Reed denies putting the fentanyl in the brownies or knowing that it was there.

The State has charged Reed with possession of fentanyl with intent to deliver and aggravated battery. Reed has pleaded not guilty to both charges.

**IN THE CIRCUIT COURT
FOR THE TWENTY-SIXTH JUDICIAL CIRCUIT
LINCOLN COUNTY, ILLINOIS**

THE PEOPLE OF THE STATE OF ILLINOIS,)	
)	
v.)	2024-CF-1818
PEYTON REED,)	
)	
Defendant.)	

INDICTMENT

THE GRAND JURORS chosen, selected, and sworn, in and for the County of Lincoln and State of Illinois, in the name and by the authority of the People of the State of Illinois, upon their oaths, present as follows:

COUNT I

That on or about the 28th day September, 2024, at and within said county of Lincoln County in the State of Illinois foresaid, the Defendant committed the offense of POSSESSION WITH INTENT TO DELIVER A CONTROLLED SUBSTANCE, in that the Defendant, PEYTON REED, did knowingly and without lawful justification possess with intent to deliver 15 grams or more but less than 100 grams of a substance containing fentanyl, a controlled substance, in violation of the Illinois Criminal Code of 2012, as amended, 720 ILCS 570/401 and 720 ILCS 570/401(a)(1.5)(a).

COUNT II

That on or about the 28th day September, 2024, at and within said county of Lincoln County in the State of Illinois foresaid, the Defendant committed the offense of AGGRAVATED BATTERY, in that the Defendant, PEYTON REED, did knowingly and without lawful justification, deliver to Victor Chase a substance containing fentanyl, a controlled substance, and that Victor Chase experienced great bodily harm or permanent disability as a result, in that Victor Chase entered into a coma, and suffered permanent brain damage, as a result of Victor Chase's ingestion of any amount of the controlled substance, in violation of the Illinois Criminal Code of 2012, as amended, 720 ILCS 5/12-3.05(g)(1).

Respectfully submitted,

Ryan LeBaron Spotter
Grand Jury Foreperson

**IN THE CIRCUIT COURT
FOR THE TWENTY-SIXTH JUDICIAL CIRCUIT
LINCOLN COUNTY, ILLINOIS**

THE PEOPLE OF THE STATE OF ILLINOIS,)	
)	
v.)	2024-CF-1818
PEYTON REED,)	
)	
Defendant.)	

PRETRIAL ORDER

This cause having come before the Court for a pretrial conference and the Court having considered all pending pretrial motions and arguments of the parties, and the Court having been informed of various stipulations into which the parties have entered, the Court hereby enters the following PRETRIAL ORDER which shall govern the parties and their witnesses during the jury trial to be held in the above-captioned matter:

1. Defendant, Peyton Reed, has entered a plea of not guilty to all indicted charges and has not indicated intent to raise any affirmative defense. The Defendant has presently exercised their Fifth Amendment right against self-incrimination and does not presently intend to testify at trial. In the event Defendant chooses to continue to exercise this right at trial, neither party may comment or refer to Defendant exercising this right at any point during a trial round.
2. The case has been bifurcated. This trial concerns only the guilt phase. No evidence that goes solely to the extent of the penalty faced by the Defendant may be presented by either party.
3. The court has jurisdiction over this matter and has found the venue to be appropriate. The parties additionally stipulate the chain of custody of all evidence is proper and may not be challenged.
4. Both parties waive all objections and motions based on the Constitution of the United States. Both parties also waive all objections and motions based on privilege except as to the Fifth Amendment privilege as stated in paragraph 1, above.
5. All photographs that the parties may use as evidence at trial are stipulated to be a fair and accurate representation of what is depicted in the photograph. The parties also stipulate to the following: Exhibit 4 is a fair and accurate photograph of the frosted brownies distributed by the Defendant and tested by the Illinois State Police in Exhibit 13; Exhibits 12-a through 12-c, are fair and accurate photographs of the party scene.

6. All witnesses who were questioned by law enforcement were either properly advised of their Miranda rights and/or agreed to speak voluntarily to law enforcement.
7. All witnesses reviewed their affidavits and reports immediately prior to trial and were given an opportunity to revise them. None did so. All witnesses affirm the truthfulness of everything stated in their affidavits. All witness affidavits have been properly signed and notarized.
8. All documents, signatures, and exhibits included in the case materials are authentic; no objections to the authenticity of any documents will be entertained. Both parties must still lay proper foundation prior to entering evidence, and both parties reserve the right to dispute any legal or factual conclusions based on these items and to make objections other than to authenticity.
9. The Court has been informed that the evidence in this case may include electronically-generated and/or artificially-generated electronic messages. These messages may be admitted into evidence if a proper foundation is established for admission, including that the electronically-generated and/or artificially-generated electronic messages be authenticated. The parties may establish authentication by any evidence, direct or circumstantial, that establishes that the message is what the proponent claims it to be. The proponent of the electronically-generated and/or artificially-generated electronic messages need prove only a rational basis upon which it can be concluded that the electronically-generated and/or artificially-generated electronic message did in fact belong to or was authored by or was caused to be created by the party alleged. The opponent, however, is not precluded from contesting the genuineness of the writing.
10. A witness must be formally tendered to the Court in accordance with Rule 702 of the Rules of Evidence before testifying in the form of an expert opinion. A party must establish by a preponderance of the evidence that the tendered expert satisfies Rule 702. There is no definitive checklist of what must or must not be presented for admission of expert testimony. The Court will apply Rule 702 based on the totality of the circumstances presented.
11. Victor Chase's gender is male for purposes of this trial. Both parties stipulate Victor Chase is absent from the trial because neither party, by legal process or other reasonable means, could procure his attendance or testimony before trial. Victor Chase went into a coma, has suffered permanent brain damage, and has not recovered as of the date of the trial. Both parties stipulate that the injuries sustained by Victor Chase are sufficient to satisfy the great bodily harm or permanent injury requirement of Count II.
12. Both parties stipulate that the defendant brought at least 15 grams of frosted brownies to the party; 57 grams of these brownies were tested by the Illinois State Police in Exhibit 13.
13. Both parties stipulate that fentanyl was found in Victor Chase's system.

14. The fentanyl found within the frosted brownies referenced in pre-trial order 12, is a Schedule II controlled substance by the United States Drug Enforcement Administration and the United States Food and Drug Administration under the Controlled Substances Act. Schedule II drugs, substances, or chemicals are defined as drugs with a high potential for abuse, with use potentially leading to severe psychological or physical dependence. These drugs are also considered dangerous.
15. No objections are allowed to Exhibit 11. Exhibit 11 may be admitted at any time during the trial after opening statements and before closing arguments by either party.
16. Neither the PartyMist AI bot website (embedded in the QR code of Exhibit 9) or the Lincolnville Pizza Palace website (see Exhibit 8) work as of trial. The parties stipulate that both links worked prior to and on the date of the incident in question. No team may comment on the fact that these links do not currently work.
17. Although motive or lack of motive is a proper subject of argument, it is not an element which must be proved by the State to convict Defendant on either Count I or Count II of the Indictment.
18. Neither party may comment on the prosecutorial discretion used by the State to charge, or not to charge, the Defendant with other crimes in this case.
19. If the defense chooses not to have the Defendant testify, the Defendant is constructively present at trial wearing, by stipulation, a blue shirt with a black necktie. The defense may not engage in any conduct that seeks to mislead a witness as to the identification of the Defendant.

ENTERED: November 22, 2024

Catherine Meyer
Circuit Judge

JURY INSTRUCTIONS

The Charges Against the Defendant

The Defendant is charged with the offenses of Possession with Intent to Deliver a Controlled Substance and Aggravated Battery. The Defendant has pled not guilty to both charges.

The Indictment - Not Evidence

The charges against the Defendant in this case are contained in a document called the Indictment. This document is the formal method of charging the Defendant and it is not any evidence against the Defendant.

Presumption of Innocence – Reasonable Doubt – Burden of Proof

The Defendant is presumed to be innocent of the charges. This presumption remains with the Defendant throughout every stage of the trial and during your deliberations on the verdict and is not overcome unless from all the evidence in this case you are convinced beyond a reasonable doubt that the Defendant is guilty.

The State has the burden of proving the guilt of the Defendant beyond a reasonable doubt, and this burden remains on the State throughout the case. The Defendant is not required to prove the Defendant's innocence.

Failure Of Defendant to Testify

The fact that the Defendant did not testify must not be considered by you in any way in arriving at your verdict.

Definition of Possession with Intent to Deliver a Controlled Substance

A person commits the offense of possession with intent to deliver a controlled substance when they knowingly and without lawful justification possess with intent to deliver a substance containing a controlled substance and the substance containing the controlled substance weighs 15 grams or more.

Definition Of Deliver

The word "deliver" means to transfer possession or to attempt to transfer possession.

The word "deliver" includes a constructive transfer of possession which occurs without an actual physical transfer. When the conduct or declarations of the person who has the right to exercise control over a thing is such as to effectively relinquish the right of control to another person, so that the other person is then in constructive possession, there has been a delivery.

A delivery may occur with or without the transfer or exchange of money, or with or without the transfer or exchange of other consideration.

Issues In Possession with Intent to Deliver a Controlled Substance

To sustain the charge of Possession with Intent to Deliver a Controlled Substance, the State must prove the following:

First Proposition: That the defendant knowingly and without lawful justification possessed a substance containing Fentanyl, a controlled substance; and

Second Proposition: That the defendant intended to deliver a substance containing Fentanyl, a controlled substance; and

Third Proposition: That the weight of the substance containing Fentanyl, a controlled substance, was 15 grams or more.

If you find from your consideration of all the evidence that each one of these propositions has been proved beyond a reasonable doubt, you should find the defendant guilty.

If you find from your consideration of all the evidence that any one of these propositions has not been proved beyond a reasonable doubt, you should find the defendant not guilty.

Definition of Aggravated Battery

A person commits the offense of aggravated battery when they unlawfully deliver Fentanyl to another and any user experiences great bodily harm or permanent disability or disfigurement as a result of the injection, inhalation, of any amount of Fentanyl.

Issues In Aggravated Battery

To sustain the charge of aggravated battery, the State must prove the following propositions:

First Proposition: That the defendant knowingly delivered Fentanyl to another person; and

Second Proposition: That Victor Chase ingested Fentanyl; and

Third Proposition: That the Fentanyl caused permanent disability or disfigurement to Victor Chase as a result of being ingested by Victor Chase.

If you find from your consideration of all the evidence that each one of these propositions has been proved beyond a reasonable doubt, you should find the defendant guilty.

If you find from your consideration of all the evidence that any one of these propositions has not been proved beyond a reasonable doubt, you should find the defendant not guilty.

Jury Is Sole Judge of The Believability of Witnesses

Only you are the judges of the believability of the witnesses and of the weight to be given to the testimony of each of them. In considering the testimony of any witness, you may take into account his ability and opportunity to observe, his/her age, his memory, his/her manner while testifying, any interest, bias, or prejudice he/she may have, and the reasonableness of his/her testimony considered in the light of all the evidence in the case.

You should judge the testimony of the Defendant in the same manner as you judge the testimony of any other witness.

APPLICABLE STATUTES

720 ILCS 5/4-5 – Knowledge

A person knows, or acts knowingly or with knowledge of:

(a) The nature or attendant circumstances of his or her conduct, described by the statute defining the offense when he or she is consciously aware that his or her conduct is of that nature or that those circumstances exist. Knowledge of a material fact includes awareness of the substantial probability that the fact exists.

(b) The result of his or her conduct, described by the statute defining the offense, when he or she is consciously aware that the result is practically certain to be caused by his conduct.

Conduct performed knowingly or with knowledge is performed willfully, within the meaning of a statute using the terms “willfully”, unless the statute clearly requires another meaning.

When the law provides that acting knowingly suffices to establish an element of an offense, that element is also established if a person acts intentionally.

720 ILCS 5/4-4 – Intent

A person intends, or acts intentionally or with intent, to accomplish a result or engage in conduct described by the statute defining the offense, when his conscious objective or purpose is to accomplish that result or engage in that conduct.

720 ILCS 570/401 - Possession with Intent to Deliver a Controlled Substance

Except as authorized by this Act, it is unlawful for any person knowingly to deliver, or possess with intent to deliver, a controlled substance other than methamphetamine and other than bath salts as defined in the Bath Salts Prohibition Act sold or offered for sale in a retail mercantile establishment as defined in Section 16-0.1 of the Criminal Code of 2012, a counterfeit substance, or a controlled substance analog. A violation of this Act with respect to each of the controlled substances listed herein constitutes a single and separate violation of this Act. For purposes of this Section, "controlled substance analog" or "analog" means a substance, other than a controlled substance, which is not approved by the United States Food and Drug Administration or, if approved, is not dispensed or possessed in accordance with State or federal law, and that has a chemical structure substantially similar to that of a controlled substance in Schedule I or II, or that was specifically designed to produce an effect substantially similar to that of a controlled substance in Schedule I or II. Examples of chemical classes in which controlled substance analogs are found include, but are not limited to, the following: phenethylamines, N-substituted piperidines, morphinans, ecgonines, quinazolinones, substituted indoles, and arylcycloalkylamines. For purposes of this Act, a controlled substance analog shall be treated in the same manner as the controlled substance to which it is substantially similar.

720 ILCS 570/401(a)(1.5)(a)

Any person who violates this Section with respect to the following amounts of controlled substance is guilty of a Class X felony and shall be sentenced to a term of imprisonment as provided:

(1.5)(A) not less than 6 years and not more than 30 years with respect to 15 grams or more but less than 100 grams of a substance containing fentanyl.

720 ILCS 5/12-3.05 (g)(1)

(g) Offense based on certain conduct. A person commits aggravated battery when, other than by discharge of a firearm, he or she does any of the following:

(1) Violates Section 401 of the Illinois Controlled Substances Act by unlawfully delivering a controlled substance to another and any user experiences great bodily harm or permanent disability as a result of the injection, inhalation, or ingestion of any amount of the controlled substance.

PROSECUTION WITNESS AFFIDAVIT: RILEY QUINN

1 My name is Riley Quinn, and I am 18 years old. I am a senior at Lincolnville High School,
2 where I have spent the last four years trying to avoid detention. Just kidding! I live with my parents
3 and younger sister in a suburban neighborhood close to school. Growing up, I was always the kid
4 who loved making people laugh. Whether it was pulling a harmless prank or cracking a joke in
5 class, I've always had a way of lightening the mood. This personality trait has earned me the title
6 of "class clown," a label I've worn proudly, even though it's sometimes led me into trouble. Lately,
7 all my silliness has helped me cope after my beloved cocker spaniel, Sadie, passed away on May
8 21, 2024. Life is short, so I go by the motto: "may you live, until you die"!

9 Anyways, at Lincolnville High, I'm known as the person who can turn any situation into
10 something fun. My friends rely on me to make them laugh and to add some excitement to otherwise
11 boring days. However, this reputation as the class clown has also meant that I've had more than
12 my fair share of trips to the principal's office. I've always been the type to push boundaries, not
13 because I'm malicious, but because I enjoy seeing how far I can go before I have to pull back. My
14 teachers have often told me that I'm smart and have a lot of potential, but I've always struggled
15 with focusing on schoolwork and keeping out of trouble. I am interested in chemistry class, but
16 I've never really been interested in academic success; I've always preferred to live in the moment
17 and make the most of my high school years. Once, I even pulled an ambitious prank at the
18 Lincolnville Community Theatre when I switched out the "props" just days before the show
19 without getting caught!

20 On the evening of September 28, 2024, I attended a party at an abandoned mansion on the
21 outskirts of Lincolnville. The party was really hyped up especially after Peyton Reed, a fellow
22 senior and someone I've known for a few years, started using an AI bot to airdrop flashy invitations

23 at school. Reed is known for being good with computers and that kind of thing, but I think Reed
24 is a bit stuffy. I've tried to get Reed to loosen up by cracking jokes in the past, but Reed doesn't
25 seem to have much of a sense of humor. That's why I was surprised to learn Reed was having a
26 party. The party was the talk of Lincolnville High in the days leading up to the event. The
27 excitement was palpable as kids exchanged rumors about the location, guest list, and the
28 mysterious AI bot that was sending out the invitations. The idea of partying in a creepy, abandoned
29 mansion was too good to pass up, so I didn't hesitate to go. When I arrived around 8:00 p.m., the
30 place was already buzzing with energy. The mansion was a mix of old, decaying grandeur and the
31 youthful vibrancy that everyone brought with them. Music blasted from portable speakers, people
32 were dancing, and there was a general sense of carefree abandon. The mansion itself added an
33 eerie thrill to the atmosphere, with its dark, empty rooms and creaking floorboards that made it
34 feel like anything could happen.

35 The party was supposed to start at 7:30 p.m., and by 8:30 p.m., most of the guests had
36 arrived and everyone was in high spirits. As more people arrived, the party only grew livelier. By
37 9:00 p.m., the mansion was packed, and it seemed like everyone was either dancing, chatting, or
38 exploring the more secluded areas of the house. The lighting was dim, which only added to the
39 mysterious and almost surreal vibe of the night. Despite the crowd, there was a strange sense of
40 intimacy, as if everyone there was in on the same secret.

41 Around 9:00 p.m., I noticed Peyton Reed passing out frosted brownies to some of the
42 guests. I distinctly remember hearing Reed mention that it was "the good stuff," which made me
43 think that Reed was either confident in the quality of their baking skills or something was up. Reed
44 was really pushing those frosted brownies! I didn't think too much of it at the time, but in hindsight,
45 I think Reed was aware that the frosted brownies were potent or different in some way. I didn't

46 personally eat any of the frosted brownies that night, but I saw a few people take frosted brownies
47 from Reed and eat them. I did have a couple of beers, but that does not affect my memory of what
48 happened.

49 One of the people who took a frosted brownie from Reed was Victor Chase, a student I've
50 seen around school but didn't know very well. A girl I knew from art class started talking with me
51 and I stopped looking at Chase. When I looked back a few minutes later, I saw Chase standing
52 with other partygoers and devouring the frosted brownie. I distinctly remember seeing this because
53 the frosting on the brownie seemed kind of "sus" and it was getting on Chase's face. Anyways, I
54 went back to chatting with people. About 15 minutes later, I saw Chase again. I noticed that he
55 wasn't looking too good. He was swaying a bit and seemed unsteady on his feet. I watched as he
56 sat down on a couch, looking increasingly disoriented. I then heard Chase say in a slurred voice:
57 "What is going on? I don't feel good. This doesn't seem like just pot brownies. I didn't want this
58 to happen." Within minutes, Chase collapsed, and everyone around him started to panic. People
59 were shouting for help, and someone called 911. It was clear that something was seriously wrong.

60 As soon as Chase collapsed, Peyton Reed rushed over to see what was happening. Reed
61 seemed shocked and it looked like Reed was trying to figure out what was wrong with Chase. Reed
62 kept asking if Chase was okay and did seem genuinely worried about what was happening. Despite
63 this, I think Reed had to know the frosted brownies were laced with fentanyl; how could Reed not
64 know? Reed made the brownies earlier and, curiously, I did not see Reed eat any of them. I don't
65 think Reed cared about the dangers of what Reed was doing. I think Reed wanted everyone to get
66 in on the "good stuff," and Reed knew the brownies were juiced with "Fenty." I learned all about
67 "Fenty" at school.

68 Anyways, after Chase was taken to the hospital, the party quickly fell apart. People were
69 scared, and everyone started leaving. Then the police officers arrived, and the scene turned into a
70 full-blown investigation. I wasn't going to stick around to see what happened next, but I was
71 stopped by Officer Alex Morgan before I got out the door of the mansion. Officer Morgan oversaw
72 collecting evidence and interviewing witnesses. I told Officer Morgan everything I knew about the
73 party, including what I saw Peyton Reed doing and saying that night. I mentioned that I saw Reed
74 handing out the frosted brownies and that Chase started acting weird shortly after eating one. I also
75 told Officer Morgan about how Reed seemed shocked and concerned when Chase collapsed. I also
76 said that I had not done any drugs at the party, though I did drink a beer or two.

77 A few weeks after the party, I was shocked to learn that I was being charged alongside
78 Peyton Reed! The charges were related to the events at the party, and I was scared about what
79 could happen to me. I've never been in serious trouble with the law before, and the thought of
80 facing charges was overwhelming. Because the police said I was underage and drinking after the
81 party, and they saw me drive away, I got charged with a DUI and underage consumption of alcohol.
82 After talking to my parents and a lawyer, I decided to take a plea deal. As part of the agreement, I
83 agreed to plead guilty to underage consumption of alcohol in exchange for testifying truthfully for
84 the prosecution. The other charges against me were dismissed because of my plea deal, which was
85 a relief. I knew that I didn't do anything intentionally wrong that night, but I also knew that I
86 needed to be honest about what happened because my expensive lawyer just kept repeating to me
87 "just tell the truth." I figured my lawyer would handle everything else. Per my plea deal, I cannot
88 really discuss some other things, but I don't think they matter too much. Yes, that's my plea
89 agreement in Exhibit 5-a and that was the offer letter from the prosecutor that my lawyer showed
90 me before I plead guilty in Exhibit 5-b; I signed Exhibit 5-a and I'm familiar with the contents of

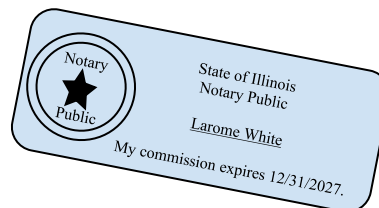
both Exhibit 5-a and 5-b. Look, we should really stay focused on Peyton Reed; Reed was the one pushing the fentanyl that night. Reed hid the fentanyl in the frosted brownies that I saw in Exhibit 4. I heard that Victor Chase spent a long time in the hospital, so I know he was hurt badly by Reed's irresponsible actions.

I also am familiar with and have knowledge about Exhibit 8; I saw that receipt on the floor at the party and was so confused why there was not enough pizza or food anywhere. I did give that to the police when they arrived that night. Exhibit 9 was the invitation to the party that linked to the AI bot that Reed created. Reed even showed me the back code he used to create the bot; that code is Exhibit 11. I even tested out the AI bot in my conversation from Exhibit 10, but I know nothing about the other conversations in Exhibit 10. I gave Exhibits 8, 9, 10, and 11 to the police. Exhibits 12-a through 12-c depicts scenes I do remember from the party, but I did not take these pictures.

Further affiant sayeth not.

Signed and sworn before me on
October 27, 2024.

Larome White



PROSECUTION WITNESS AFFIDAVIT: OFFICER ALEX MORGAN

1 My name is Alex Morgan. I am a police officer with the Lincolnville Police Department
2 and have served in law enforcement for over fifteen years. I love my work and the feeling it gives
3 me of contributing to this wonderful community! For the past six years, I have specialized in crime
4 scene investigation and evidence collection, for which I received significant training. I also
5 volunteer to speak to high school students about the hazards of using illegal drugs and about ways
6 they can reduce the risk of someone dying from an overdose, such as the use of Narcan, a nasal
7 spray that can stop an opioid overdose.

8 In my role as a police officer, my primary responsibilities include securing crime scenes,
9 collecting physical evidence, and ensuring the integrity of that evidence throughout the
10 investigation process. I have been trained in proper chain of custody procedures and have
11 experience collaborating with forensic experts to analyze and preserve evidence for use in court.
12 In my years on the force, I have overseen many cases involving drugs, violent crimes, and chaotic
13 scenes, all of which have required careful and diligent work to ensure the justice system works
14 fairly and accurately.

15 On the night of September 28, 2024, I was dispatched to an emergency call of a party at an
16 abandoned mansion on the outskirts of Lincolnville. The call came in at approximately 9:20 p.m.,
17 indicating that a large number of young people were attending an unsupervised party at the
18 mansion and that there was a medical emergency involving a possible drug overdose. I arrived at
19 the scene at approximately 9:28 p.m., where I observed a chaotic environment. The mansion was
20 filled with 30-40 high school students, many of whom were visibly intoxicated or appeared to be
21 under the influence of drugs.

22 Upon entering the premises, I immediately noticed the disorganized state of the scene.
23 There were empty bottles, drug paraphernalia, and discarded cannabis joints scattered throughout
24 the mansion. The atmosphere was tense, with students panicking as emergency medical services
25 were already on site, attending to a young individual who was unconscious and suffering from
26 what I later learned were symptoms of a fentanyl overdose. I determined that this individual was
27 a 19-year-old high school student named Victor Chase.

28 After ensuring that paramedics were overseeing the medical emergency, I began the
29 process of securing the scene and collecting physical evidence. My primary focus was on finding
30 any drugs or substances that might have contributed to the medical emergency. During my search,
31 I found one partially smoked joint on a coffee table, empty and partially empty beer bottles in
32 various rooms, and a baking dish with frosted brownies in the kitchen. I suspected that the brownies
33 contained cannabis. There was also one cannabis joint on the floor in the bedroom (too burnt to
34 collect), and traces of cannabis residue throughout the residence. The cannabis was not confined
35 to a single area but was present in multiple rooms, reinforcing the theory that it was a central part
36 of the party atmosphere and that it was widely distributed and consumed by multiple attendees.

37 As part of my standard procedures, I took photographs of the party scene, including the
38 frosted brownies in the location where they were found, and the alcohol bottles and drug
39 paraphernalia. The scene was chaotic, with some students leaving as law enforcement arrived.
40 There were also students moving around the mansion in the areas where the evidence was found.
41 This made it difficult to fully secure the area, and I was concerned about the potential for evidence
42 to be tampered with or moved before I was able to collect it. However, I did my best to document
43 the scene as it appeared upon my arrival and during my search, preserve the evidence, and properly
44 collect the brownies and other evidence. I followed strict chain of custody procedures once the

45 samples were collected. Each sample was immediately labeled and sealed in evidence bags before
46 being transported back to the police station for processing. I completed a detailed chain of custody
47 report, documenting the transfer of each piece of evidence from the scene to the evidence storage
48 facility. Later the evidence was sent off to the laboratory for testing. The frosted brownies collected
49 and sent for testing are depicted in Exhibit 4 and the results of testing are in Exhibit 13; I'm familiar
50 with and have knowledge about both exhibits.

51 As part of my duties, I am obligated to be transparent about any potential flaws in the
52 evidence collection process. In this case, while I am confident that the majority of the samples
53 were collected and preserved properly, I cannot ignore the fact that the scene was highly
54 disorganized, and there were other substances found at the party that could complicate the
55 investigation.

56 After collecting evidence, I focused on interviewing witnesses. Some interviews took place
57 at the investigation site, and some were conducted later. From these interviews, I learned that some
58 party attendees were seen consuming a variety of substances, including alcohol and prescription
59 pills, which could have contributed to the medical emergency. Multiple witnesses confirmed that
60 high school student Peyton Reed was the person who had distributed the brownies at the party.
61 Some witnesses said that they saw Reed handling brownies from a baking dish to various attendees,
62 including Victor Chase.

63 At the party, I interviewed partygoer, Riley Quinn, who reported hearing Reed state that
64 the brownies were "extra special" the "good stuff." Quinn also said a belief that Reed must have
65 known there was something besides cannabis in the brownies. None of the witnesses heard Reed
66 say that Reed knew the brownies contained fentanyl, however. I also noted that Riley Quinn's
67 breath smelled like alcohol; however, Quinn seemed lucid when we spoke.

68 These interviews were critical in establishing a link between Reed and the frosted brownies
69 distributed at the party. While I did not personally witness Reed distributing the frosted brownies,
70 the consistent accounts from multiple attendees made it clear that Reed was the sole provider of
71 the frosted brownies.

72 After collecting the evidence and conducting interviews, I compiled a detailed report
73 outlining the events of the night and that is Exhibit 7. My report includes the locations where the
74 cannabis samples were found, the state of the party scene, and the chain of custody procedures I
75 followed. It also includes the statements from witnesses confirming that Peyton Reed was
76 responsible for distributing the frosted brownies later found to contain cannabis and fentanyl.

77 My role in this case was to collect physical evidence from the scene of the party, document
78 the environment, and interview witnesses to establish a link between the events of the night and
79 the individuals involved. While I am confident in the evidence I collected and the statements
80 provided by the witnesses, there are complexities in this case that must be considered.
81 Nevertheless, the evidence supports a clear connection between Peyton Reed and the frosted
82 brownies that led to Chase's overdose.

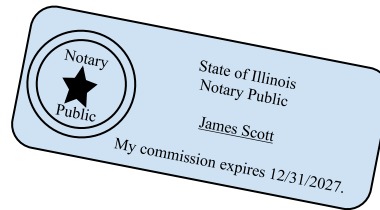
83 Unfortunately, I was not surprised to learn the frosted brownies were laced with fentanyl.
84 I've seen a meteoric rise in the use of this deadly drug in recent years. In fact, since 2013, synthetic
85 opioid deaths in Illinois have increased 3,341%. In my training, I have learned that this stuff is
86 approximately one hundred times more potent than morphine and fifty times more potent than
87 heroin. In Lincoln County, people call it: "Crazy One", "Mist", "Friend", "Fire", "Jackpot",
88 "Fent(y)", "F", "Good Stuff", "Blues", "TNT", "He-Man", and "Dance Fever". It is considered a
89 Schedule II narcotic.

90 I am familiar with and have knowledge about Exhibits 9, 10, and 11. They were supplied
91 by Riley Quinn during my investigation, and I have relied on them during my investigation.
92 Further, I received the toxicology report in Exhibit 6 and used this to further my investigation.

93 Further affiant sayeth not.

94 Signed and sworn before me on
95 October 28, 2024.

96 James Scott



PROSECUTION WITNESS AFFIDAVIT: DR. JAMIE CRUZ

1 I am Dr. Jamie Cruz, and I live in Lincoln County, Illinois. My journey in medicine began
2 with a strong academic foundation. I graduated summa cum laude from the University of Illinois
3 at Urbana-Champaign with a Bachelor of Science degree in Molecular and Cellular Biology in
4 2003. My fascination with the complexities of the human body, especially how it responds to
5 various substances, led me to pursue a Doctor of Medicine (MD) degree from the University of
6 Chicago Pritzker School of Medicine, where I graduated with honors in 2007. During my medical
7 studies, I developed a deep interest in pharmacology and toxicology, fields that explore how drugs
8 and other substances affect the human body. After completing my residency in Emergency
9 Medicine at the University of Chicago Medical Center in 2011, I pursued a fellowship in Medical
10 Toxicology at the same institution, which I completed in 2013.

11 I have since worked as an Emergency Medicine Physician with a specialization in
12 Toxicology at several leading hospitals, including the University of Chicago Medical Center, Cook
13 County Hospital, and currently at Lincolnville Community Hospital. Over the past decade, I have
14 treated thousands of patients in emergency settings, with a particular focus on drug overdoses and
15 poisonings. My role often involves making rapid decisions under pressure, accurately diagnosing
16 conditions related to substance abuse, and administering life-saving treatments. My expertise in
17 toxicology allows me to quickly identify the signs of drug intoxication and overdose, and to
18 determine the proper course of action to stabilize and treat patients.

19 In addition to my clinical work, I have contributed to the field of toxicology through
20 research and teaching. I have published several articles in peer-reviewed journals on topics such
21 as opioid toxicity, the pharmacokinetics of emerging synthetic drugs, and advancements in
22 emergency treatment protocols. I am also a clinical professor at the University of Illinois College

of Medicine, where I teach courses on emergency medicine and toxicology to medical students and residents. My academic work allows me to stay at the forefront of developments in toxicology and to educate the next generation of physicians on best practices in emergency medicine.

My approach to medicine is grounded in a commitment to patient safety and evidence-based practice. Every decision in the emergency room should be informed by the best available scientific evidence, tempered by clinical experience and a deep understanding of the patient's condition. In cases of drug overdose, where the stakes are incredibly high, this approach is critical. My goal is always to stabilize the patient, address the underlying cause of their symptoms, and provide the best possible care in what are often life-threatening situations. My entire curriculum vitae is found in Exhibit 1.

On the night of September 28, 2024, I was the attending emergency room physician at Lincolnville Community Hospital when Victor Chase was brought in by ambulance after collapsing at a party. Chase arrived at approximately 9:45 p.m., unconscious and exhibiting severe respiratory depression, bradycardia (a dangerously slow heart rate), and other signs of opioid intoxication. Based on my experience, these symptoms were immediately recognizable as classic signs of a fentanyl overdose, a diagnosis that was later confirmed by toxicology reports seen in Exhibit 6; I'm familiar with and have knowledge about this exhibit.

Upon Chase's arrival, my priority was to stabilize his breathing and heart rate. Given the severity of his symptoms, I administered naloxone, also known as Narcan, an opioid antagonist that reverses the effects of opioid overdoses. Within minutes, Chase's condition began to improve, which strongly indicated that an opioid, such as fentanyl, was the substance responsible for his symptoms. Chase briefly regained consciousness and stated he had no idea what had happened to him and that he only ate one frosted brownie at the party. He seemed confused and scared. The

rapid response to naloxone is characteristic of opioid overdoses, particularly those involving fentanyl, which is known for its potency and rapid onset of action.

The toxicology report conducted shortly after Chase's arrival confirmed the presence of fentanyl in his system, linking his symptoms directly to fentanyl exposure. The report also detected other substances, including alcohol and traces of prescription medications, but the concentration of fentanyl was notably high. This finding supported my initial diagnosis and confirmed that the primary cause of Chase's symptoms was fentanyl intoxication.

The timing and nature of Chase's symptoms are consistent with the effects of consuming fentanyl-laced substances. According to witness statements, Chase began exhibiting symptoms shortly after consuming a frosted brownie at the party, which aligns with the rapid onset of fentanyl's effects. Given the timeline and the severity of his symptoms, it is highly unlikely that the fentanyl came from any source other than the frosted brownie he consumed. This conclusion is further supported by the toxicology report, which did not detect any other opioids that could have caused similar symptoms.

While fentanyl was the primary substance found in Chase's system, the toxicology report also revealed the presence of alcohol and prescription drugs. This was confirmed by Chase's medical records in Exhibit 3. It is important to acknowledge that these substances could have contributed to Chase's overall condition, complicating the clinical picture. Alcohol is a central nervous system depressant that can exacerbate the effects of opioids, leading to more severe respiratory depression. The presence of multiple substances in Chase's system could have interacted in ways that intensified his symptoms, making it difficult to isolate the exact cause of his condition.

I must also acknowledge that other forms of opioids, including legally prescribed medications, can produce symptoms similar to those of a fentanyl overdose. However, based on the toxicology report and the clinical presentation, fentanyl remains the most probable cause of Chase's symptoms. The rapid onset and severity of his condition, as well as the specific response to naloxone, are more characteristic of fentanyl than other opioids.

The emergency room setting is inherently chaotic, and patients like Chase, who present with multiple substances in their system, may exhibit changing symptoms as their body attempts to reach homeostasis. For example, initial signs of cannabis use may be overshadowed by the more life-threatening effects of fentanyl as the body struggles to cope with multiple drugs. This dynamic process can complicate the diagnosis and treatment, but in Chase's case, the overwhelming evidence points to fentanyl as the primary agent responsible for his condition.

During Chase's treatment, I reviewed the medications administered both by the ambulance team and in the emergency room. While fentanyl is sometimes used in medical settings for pain management, it was not administered to Chase during his treatment at Lincolnville Community Hospital. This fact is crucial in establishing that the fentanyl found in his system was not the result of hospital administration but was likely ingested at the party. However, I must acknowledge that in chaotic situations, especially with critically ill patients, there is always a risk of cross-contamination or confusion in treatment, although there is no indication this happened with Chase.

Although the toxicology report confirmed the presence of fentanyl, it does not conclusively prove whether the fentanyl was contained in the frosted brownies provided by Peyton Reed at the party. The presence of other substances complicates the picture, and it is difficult to definitively trace the source of the fentanyl. However, based on the evidence available and the clinical presentation, I maintain that the fentanyl-laced frosted brownies are the most likely source. This

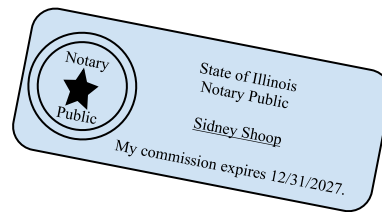
91 conclusion is supported by the timing of the symptoms, the toxicology findings, and the response
92 to treatment.

93 It is important to note that the emergency room environment is fast-paced and often chaotic,
94 particularly when dealing with life-threatening conditions like drug overdoses. In Chase's case,
95 however, I am confident that the treatment he received was proper and that the fentanyl in his
96 system was ingested prior to his arrival at the hospital and the overwhelming evidence supports
97 the conclusion that the fentanyl came from the frosted brownies he consumed at the party.

98 Further affiant sayeth not.

99 Signed and sworn before me on
100 October 29, 2024.

101 **Sidney Shoop**



DEFENSE WITNESS AFFIDAVIT: TAYLOR JORDAN

1 My name is Taylor Jordan, and I am 17 years old. I am currently a senior at Lincolnville
2 High School, where I have been a student since my freshman year. I have lived in Lincolnville,
3 Illinois, my entire life. I live with my parents, my younger sibling, my beloved dog, “Briggs”, my
4 horse, “Baylee”, and a very vocal calico cat, “Tina the Cat”. My family is close-knit, and my
5 parents have always emphasized the importance of responsibility, loyalty, and good judgment. I
6 am an active participant in several school activities, including the debate team, Wingspan club, the
7 Lincolnville community theater, and the tech club, where I have developed an interest in computer
8 science and artificial intelligence.

9 I have known Peyton Reed since middle school, and we have been close friends for several
10 years. We became best friends in the summer of 2023 when we both worked part-time at the local
11 Sawtooth gas station. We spent all summer downing Slurpees and pretending to pay attention to
12 what customers bought as we rang up their orders. Reed and I share a common interest in
13 technology, which has been a central part of our friendship. I would say I make friends more easily,
14 but Reed is known among our classmates for being tech-savvy and creative, especially when it
15 comes to using technology for social activities. We have worked together on numerous school
16 projects, and I consider Reed to be a responsible person who generally thinks through the
17 consequences of actions before taking them.

18 Reed also has told me about wanting to be more popular at school. No matter how many
19 times I have told Reed that people like Reed, this still seems to be something Reed really cares
20 about. At the start of school last year, we were talking about ways Reed might make more friends
21 at school and I remember saying that Reed should throw a party. I didn’t think much more about
22 it until September 19, 2024, when Reed started talking to me about the idea again. Reed had the

beginning of a plan, which sounded like another crazy adventure. I say another because we have been known for having a few adventures in the past, hee hee. Reed's idea was to throw an exclusive high school party where invitees felt they were really going somewhere special. Reed had recently developed an AI bot named "PartyMist" and thought it would be fun to use the bot to create and distribute invitations; that is the invitation Reed used in Exhibit 9.

Reed said that the AI bot would spread invitations out to our peers and, after clicking on the QR code/ link on the invitation, PartyMist AI would interact with the partygoers to encourage them to attend the party. The idea was to make the party seem more exciting and mysterious by having the AI bot tell kids all the details, including the time, location, and guest list. Reed told me that the bot was designed to always, more than anything else, encourage people to attend the party. Reed thought this design could help attract more people to the party. I don't know how it really worked. I think maybe it fed into their social media profiles and gathered online data to make the interaction more persuasive and seem more real. I thought it was a really cool idea, and, since I'm not as good as Reed at writing code for programs like this, I agreed to help Reed with some of the other logistics, like picking up food and other supplies and helping to spread the word among our friends the old fashioned way - just inviting my friends face to face. Reed did show me the code for the AI bot that Reed wrote and that is depicted in Exhibit 11, but I don't really understand it.

Additionally, I agreed to help Reed check PartyMist's AI functionality. The day before the party, just to make sure everything was running smoothly, I chatted with the AI bot. Yes, those are my conversations in Exhibit 10. While I was only testing out the functionality, my concerns about the party were genuine based upon the rumors I was hearing. The AI bot worked so well that I felt compelled to go to the party and almost forgot that I was just spot-checking the AI bot for Reed.

45 The party took place on the night of September 28, 2024, at an abandoned mansion on the
46 outskirts of Lincolnville. Reed found the location through some online research and thought it
47 would add to the allure of the event. I arrived early at the party around 7:00 p.m., along with a few
48 other friends. It wasn't supposed to start until 7:30 p.m. and, let's be honest, no one arrives at
49 parties exactly "on time" these days! Reed was already there, setting up and making sure
50 everything was ready. Reed said Reed had a key to the place and wanted to set up early to make
51 sure everything was just right. I didn't think much of that at the time. I was more struck by how
52 big the old mansion was. It was creepy looking at first but, upon further inspection, seemed only
53 recently abandoned and still decently clean. How cool! I did notice Reed had a pizza delivered
54 around 8:15 p.m. but it seemed like it was just for Reed. Exhibit 8 does look familiar as I came to
55 the door to get the food for Reed and was given this receipt; I tossed it on the floor, I think.

56 There were about 20 to 30 people at the party by 8:30 p.m., most of whom had been invited
57 through PartyMist AI. I could not believe the AI bot worked! It was like these people had no choice
58 but to come to our party; the bot must have been really convincing!

59 Shortly after 9:00 p.m., Reed started passing out frosted brownies to some of the attendees.
60 The frosted brownies Reed passed out are the ones depicted in Exhibit 4. Reed encouraged
61 attendees to "try it out" and seemed unusually confident in the quality of this party favor. I was
62 surprised by this because Reed hadn't mentioned anything about bringing frosted brownies to the
63 party beforehand. When I asked about it, Reed said it was "just something spicy to add to the fun"
64 and "don't worry" that it had come from a trusted source, Reed's cousin. Reed even mentioned
65 that it was "the good strong stuff," but I didn't think much of it at the time. I thought maybe Reed
66 meant they were not pot brownies. Reed offered me some, but I declined because I'm not into that.

67 I think everyone knew they had something in them. Reed then handed frosted brownies out to
68 some others, who seemed excited to try them, and placed the baking dish on the counter.

69 As the night went on, I was looking around and saw that one of the partygoers, Victor
70 Chase, was acting strangely and looked a bit unwell. Chase is a kid at our high school. I have had
71 a class or two with him, though I don't know him very well. Chase seemed disoriented, and then
72 he suddenly muttered something like "what's happening to me?" and collapsed onto the floor.
73 Everyone in the area seemed to freeze as we all stared at Chase, then some people started to panic.
74 Everyone was trying to figure out what was happening to Chase. Reed seemed genuinely shocked
75 and concerned, repeatedly asking if Chase was okay and trying to keep him conscious. It was clear
76 that no one, including Reed or Chase, expected anything like this to happen. Some people at the
77 party tried to help Chase by trying to give him water and keep him awake, but nothing seemed to
78 work. Someone called 911. I am not sure who called. An ambulance arrived and medics checked
79 Chase out, put him in the ambulance, and drove away.

80 The day after the party, I spoke to Reed about what had happened. Reed was visibly shaken
81 and kept repeating, over and over again, "it was a terrible accident," and "I never meant for anyone
82 to get hurt." I thought Reed meant that Reed didn't mean for anyone to get hurt at the party, but
83 then Reed told me that a police officer said that there had been something in the frosted brownies
84 that made them harmful. Reed said that the weed he added to them had come from his cousin, a
85 source Reed trusted, and that there was no way Reed could have known, the frosting, or the weed,
86 or the brownie ingredients (I cannot remember which of the three he said), was laced with fentanyl.
87 Reed expressed deep regret and was worried about what might happen to Chase. Reed also
88 mentioned feeling responsible, even though there was no intention to harm anyone.

89 A few days later, a police officer, Officer Morgan called me and asked questions about the
90 party. I told Officer Morgan everything I knew, including the fact that Reed had brought the frosted
91 brownies and passed a few out, and that Reed was genuinely shocked and concerned when Chase
92 collapsed. Despite a clear memory, I also mentioned that Reed had said Reed did not know that
93 the weed had fentanyl in it. Reed had repeatedly told me this just days before and I knew that's
94 what needed to be said. Even though Officer Morgan did not ask, I told Officer Morgan that people
95 in school call fentanyl "Mist" and "Fenty".

96 The police asked me about the AI bot "PartyMist" and whether it had anything to do with
97 the drugs. I explained that, as far as I knew, Reed only created PartyMist AI to distribute the
98 invitation to the party and that there was no connection between the AI bot and drugs.

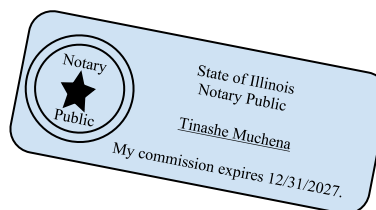
99 From what I know of my best friend Reed, what happened at the party on September 28,
100 2024, was a tragic accident and Reed had no idea that there was anything in the frosted brownies
101 but weed. Reed cares about people and is not someone who would put others in danger. Although
102 I know Reed has smoked weed in the past to help with anxiety, I don't think Reed is deeply
103 knowledgeable about drugs. The idea of using PartyMist AI to invite people to the party was meant
104 to be a fun and creative way to gather friends, not to lure anyone into a harmful situation. I believe
105 that Reed truly thought the frosted brownies were safe. When Chase collapsed, Reed's immediate
106 reaction was one of shock and concern, which to me shows that there was no malicious intent.

107 Along with the exhibits I've already referred to, I am also familiar with and have
108 knowledge about the scenes depicted in Exhibits 12-a through 12-c.

109 Further affiant sayeth not.

110 Signed and sworn before me on
111 October 27, 2024.

112 Tinashe Muchena



DEFENSE WITNESS AFFIDAVIT: DR. CASEY ROBIN

1 My name is Dr. Casey Robin. I received my Bachelor of Science degree in Biology from
2 the University of Chicago in 2004, graduating with honors. My fascination with the complexities
3 of the human body led me to pursue a Doctor of Medicine (MD) degree, which I earned from
4 Northwestern University Feinberg School of Medicine in 2008. During my medical studies, I
5 developed a strong interest in pharmacology and the ways in which various substances interact
6 with the body. This interest grew into a passion for toxicology, the field in which I would
7 eventually specialize. After completing my residency in Emergency Medicine at Northwestern
8 Memorial Hospital, I pursued a fellowship in Medical Toxicology at the University of California,
9 San Francisco, which I completed in 2012.

10 Since completing my fellowship, I have worked as a Medical Toxicologist and Emergency
11 Medicine Physician at several prestigious institutions, including Northwestern Memorial Hospital,
12 the University of Chicago Medical Center, and currently at St. Mary's Hospital in Lincolnville.
13 Over the past 12 years, I have overseen many cases involving drug overdoses, poisonings, and
14 other toxic exposures. My experience includes both clinical practice, where I treat patients directly,
15 and academia, where I teach medical students and residents about toxicology. I am board-certified
16 in both Emergency Medicine and Medical Toxicology, and I have published numerous articles in
17 peer-reviewed journals on topics such as opioid toxicity, the effects of polydrug use, and
18 advancements in antidotal therapies.

19 In addition to my clinical and academic work, I have served as an expert witness in several
20 legal cases involving drug overdoses, poisoning, and wrongful death. My expertise is often sought
21 in cases where the cause of symptoms, injury, or death is disputed, particularly when multiple
22 substances are involved. I have testified in both civil and criminal cases, providing opinions based

23 on my extensive knowledge of toxicology and emergency medicine. My approach is always to
24 provide an objective, evidence-based analysis of the facts, ensuring that my testimony reflects the
25 most accurate understanding of the medical science at hand. I charge a standard rate of \$850 an
26 hour and a generous \$15,000 appearance fee. For this case, I have spent approximately 26 hours
27 reviewing materials. My entire curriculum vitae is Exhibit 2 and you can clearly see why I get paid
28 the big bucks for what I do! However, the fact that I am being paid to testify does not affect my
29 opinions in this case.

30 My philosophy in medical practice has always been centered on the principle of “do no
31 harm.” This means not only treating patients with the utmost care but also ensuring that the
32 treatments and interventions provided are based on the best available evidence. In the high-
33 pressure environment of the emergency room, decisions must often be made quickly, but they must
34 also be made with a clear understanding of the potential risks and benefits. My experience has
35 taught me the importance of considering all factors when diagnosing and treating patients,
36 especially in cases involving drug use, where multiple substances may interact in unpredictable
37 ways.

38 As a medical professional, I am committed to keeping objectivity in all aspects of my work.
39 This is particularly important when I serve as an expert witness. I understand that my role is not to
40 advocate for one side or the other, but to provide a clear, unbiased analysis of the medical evidence.
41 This commitment to objectivity has earned me a reputation for fairness and accuracy in my expert
42 testimony. The integrity of the legal process depends on experts like me providing honest,
43 evidence-based opinions that can help the court reach a just conclusion.

44 I was contacted to serve as a defense expert in the case involving Peyton Reed, who is
45 charged with possession of fentanyl with intent to deliver and aggravated battery related to the

overdose of one Victor Chase at a party on September 28, 2024. My role in this case is to provide an expert opinion on the potential causes of Chase's severe symptoms and to evaluate the medical treatment he received at the emergency room. I reviewed the medical records, toxicology reports, and other relevant documents related to the case. They are depicted in Exhibits 3, 6, and 13. I am familiar with and have knowledge about these exhibits. My goal was to determine whether the fentanyl found in Chase's system could have originated from sources other than the frosted brownies provided by Peyton Reed and to assess whether other factors could have contributed to Chase's condition.

Upon reviewing the medical records, I noted that Chase's symptoms as recorded - such as respiratory depression, unconsciousness, and bradycardia—are indeed consistent with a fentanyl overdose. Fentanyl is a potent synthetic opioid that can cause rapid onset of these symptoms when ingested, particularly if the individual is not tolerant to opioids. The timeline of events, as reported by witnesses, aligns with the typical effects of fentanyl, which can occur within minutes of exposure. While these observations are consistent with fentanyl exposure, it is important to consider other factors that could have contributed to or exacerbated these symptoms.

My review of the emergency treatment provided to Chase raised some questions about the procedures followed. In high-pressure situations like drug overdoses, emergency room staff must act quickly to stabilize the patient. However, the chaotic nature of such situations can sometimes lead to errors or oversights. In Chase's case, the administration of naloxone, also known as Narcan, an opioid antagonist, temporarily reversed his symptoms, which strongly suggests that fentanyl was involved. However, I must also consider whether other substances present in Chase's system, or the treatments administered in the emergency room, could have influenced the severity and progression of his symptoms.

69 In my analysis, I explored alternative explanations for Victor Chase's symptoms. The
70 toxicology report revealed that Chase had multiple substances in his system, including alcohol and
71 prescription drugs, which could have interacted in complex ways. Alcohol, for example, is a
72 central nervous system depressant that can enhance the effects of opioids like fentanyl.
73 Prescription drugs, depending on their nature, can also interact with opioids, leading to increased
74 sedation, respiratory depression, or other life-threatening conditions. Given the combination of
75 substances, it is not possible to conclusively state that fentanyl, alone, contributed to all of Chase's
76 symptoms.

77 While the toxicology report confirmed the presence of fentanyl in Chase's system, the
78 timing and accuracy of the report must be scrutinized. Toxicology tests are extremely sensitive,
79 but they are fallible. The timing of when the samples were taken, the potential for contamination,
80 and the handling of the samples can all affect the results. Additionally, the presence of other
81 substances complicates the interpretation of the toxicology findings. In this case, while fentanyl
82 was detected, it is not definitively clear that the fentanyl came from the frosted brownies provided
83 by Peyton Reed, especially given the possibility that Chase could have been exposed to fentanyl
84 from other sources, including during his treatment at the hospital.

85 The interaction of the substances in Chase's system could have mimicked the symptoms
86 of a fentanyl overdose, making it challenging to pinpoint the exact cause of his condition. For
87 example, alcohol combined with prescription sedatives could produce profound sedation and
88 respiratory depression, symptoms that are also characteristic of a fentanyl overdose. In cases where
89 multiple substances are involved, it is critical to consider the synergistic effects, where the
90 combined impact of the substances is greater than the sum of their individual effects. This

complexity adds a layer of uncertainty to the case, making it difficult to attribute Chase's symptoms solely to fentanyl exposure.

Another factor that must be considered is the possibility that fentanyl was administered to Chase during his emergency treatment. Fentanyl is commonly used in hospital settings for pain management, particularly in cases of severe trauma or distress. If fentanyl was administered in the emergency room, this could account for its presence in Chase's system. The chaotic nature of emergency treatment, especially in life-threatening situations, can sometimes lead to challenges in accurately tracking all administered medications. This possibility must be weighed when interpreting the toxicology report and figuring out the source of the fentanyl.

Despite exploring alternative explanations, I must acknowledge that the most probable cause of Chase's severe symptoms is indeed fentanyl, as confirmed by the toxicology report. The rapid onset of symptoms after consuming the frosted brownies, along with the response to naloxone, strongly supports the conclusion that fentanyl was a key factor in his condition. While other substances in his system may have played a role, fentanyl is known for its potency and the immediacy of its effects, making it the primary suspect in this case. However, the exact source of the fentanyl is still a point of contention, and it is important to consider all avenues, including the potential for hospital administration or contamination.

My analysis provides an alternative perspective to that of Dr. Jamie Cruz, who treated Victor Chase in the emergency room. Dr. Cruz's observations are based on direct interaction with Chase at the time of his treatment, which gives weight to Dr. Cruz's conclusions. However, my role as an expert is to consider all factors, including those that may not have been immediately apparent during the emergency treatment. While my alternative explanations might be seen as speculative compared to Dr. Cruz's firsthand observations, they are grounded in medical science

and the complexities of toxicology. It is my duty to present these possibilities to ensure that the court has a comprehensive understanding of the case.

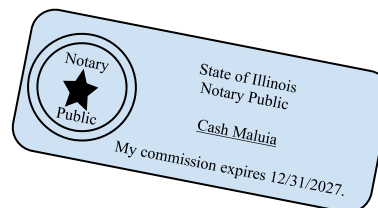
My role in this case is to provide an objective analysis of the medical evidence, considering all factors that could have contributed to Chase's severe symptoms on the night of September 28, 2024. While the evidence strongly suggests that fentanyl was a major factor, my analysis highlights the complexities involved in cases of polydrug use and the challenges in definitively determining the source of the fentanyl found in Chase's system. My goal is not to exonerate or implicate any party, but to provide an accurate and thorough understanding of the medical evidence. The chaotic nature of the emergency treatment, the presence of multiple substances, and the potential for fentanyl to have been administered in the hospital all contribute to the uncertainty in this case. While I concede that fentanyl is likely the primary cause of Chase's symptoms, the exact circumstances of how the fentanyl entered his system remain unclear. Further, I cannot state within any degree of any medical or scientific certainty the extent to which, if any, the fentanyl caused any of Chase's injuries.

I am familiar with and have knowledge about the exhibits mentioned above.

Further affiant sayeth not.

Signed and sworn before me on
October 28, 2024.

Cash Maluia



DEFENSE WITNESS AFFIDAVIT: PEYTON REED

1 My name is Peyton Reed. I turned 18 on September 8, 2024. I live with my parents in
2 Logan's Landing, Lincoln County, Illinois. I also have an older sister who is in her third year of
3 college at Illinois State University. My mom is a veterinarian, and my dad is a realtor. They are
4 both really focused on their children excelling in academics. My sister is acing all her college
5 classes and plans to go to veterinary school, but I'm not sure what I want to do. I really like
6 computers and would like to create video games or do something with AI, but I haven't told my
7 parents. I'm a senior this year at Lincolnville High School, and I am on the Honor Roll and have
8 a 3.8 GPA. I used to have a 4.0 GPA, but I had to take Public Speaking last semester. I was so
9 nervous about getting up in front of other people that I got a B, which messed up my perfect record!
10 I was looking at several colleges and trying to decide which one to attend when the trouble started.
11 Now I don't know what my future holds; I do not want to end up working at the local Sawtooth
12 gas station! I try to seem cool about it, but I have never really been in trouble before and I'm really
13 scared.

14 It all started in September 2024, right after school started. Even though I did well in school,
15 and I think people liked me okay, I had never really felt like I was part of the "in" crowd. I can be
16 really outgoing and fun when interacting with my friends online, but I am kind of shy and slow to
17 get to know people in the real world. On the weekends, I sometimes go to a movie or play video
18 games with my best friend, Taylor Jordan, and a few other friends, but I spend a lot of time
19 studying. When I was a junior, I would come back to school after the weekend and hear other kids
20 talking about the great parties they went to. It always sounded like a lot of fun, but I never seemed
21 to be invited. I know it sounds dumb now, but I felt like I was missing out on a fun part of being

22 in high school. I decided that since it was a new year (and my Senior Year) I was going to change
23 things.

24 Jordan has always been more outgoing than I am and seems to easily make friends. Jordan
25 has heard me talking about how I felt like I was missing out by not going to parties. Finally, Jordan
26 said, “why don’t you just have your own party?” At first it seemed ridiculous, but the more I
27 thought about it, the more I really wanted to do it. I wanted to make it such a fun time that no one
28 would be able to stop talking about it for the rest of my senior year. I guess I got my wish.

29 The big problem was that I couldn’t have it at my house because our house is small, and
30 my parents never seem to go anywhere, but I came up with a great solution! My dad had just been
31 telling my mom that he was selling a house for Brad and Sally Sunderson, and that they were
32 touring Europe for a month while my dad helped get their house on the market. Their house is near
33 where my family goes kayaking at Logan Lake and we have stopped by to say hello a few times.
34 It’s a big old house in the woods, and everyone in town calls it “the Mansion.” My dad said that
35 the yard needed some sprucing up and the house was going to be “staged” after years of neglect,
36 so it wouldn’t be ready to show to possible buyers for a couple of weeks. I knew that there was a
37 lock box on the door of the house with a key to the house in it. I saw my dad write the code to the
38 lock box on a notepad on his desk, so I knew I could get the key to the house. Probably it wasn’t
39 the best idea, but at the time it seemed like the perfect place for a party. I was pretty confident I
40 could keep things under control, and we’d clean things up afterwards and no one would be the
41 wiser. I decided to have it on Saturday, September 28, 2024, a few weeks after school started.

42 The problem was that I didn’t know enough people to invite to make it a real party and I
43 knew if it was going to be epic, I had to do something to get a lot of kids to show up. Like I said,
44 I’m rather good with computers, so I made a digital invitation with a QR code that would take kids

45 to an online generative AI bot called PartyMist. The invitation I used is the one in Exhibit 9. Then,
46 I used the AirDrop function on my phone to share the flyer with people at school who had their
47 AirDrop function turned on. Anyone who clicked on the link would go to PartyMist and could see
48 the details and ask the AI bot questions about the party. I programmed the AI bot to answer
49 questions in a way that would emphasize what a fun time it was going to be, but I didn't tell it
50 what to say. The source code I wrote is in Exhibit 11 and those are conversations the AI bot had
51 with partygoers in Exhibit 10. The invitation just said that there would be a party at the old
52 Mansion, or I guess everyone kind of knew where it was going to be, on September 28, 2024, at
53 7:30 p.m., and had the QR Code. I thought this would be a fun way of getting kids excited about
54 the party and meeting new people, but it ended up backfiring big time.

55 The week before the party, I started to get nervous that the party wouldn't be exciting
56 enough. That's when I got the idea that I should do something extra special to make the party
57 memorable. I knew my older cousin, Michael, smoked weed sometimes. He had let me try it and
58 I knew it could make everyone really mellow and happy. It really helped reduce my anxiety. I
59 never meant to hurt anyone. I just wanted everyone to have an enjoyable time. Michael gave me a
60 couple of bags of weed he said he got at a licensed dispensary and said, "this should get rid of
61 those blues and give everyone dance fever!" I didn't think anything of his comments. He told me
62 the best thing to do was to bake the weed into brownies, so that's what I did. I told Jordan I had
63 gotten some weed, and I may have said it was "good stuff," but I hardly ever smoke pot, so I don't
64 really know good stuff from bad stuff. I sure didn't know there was anything wrong with it or I
65 would never have given it to anyone.

66 I arrived at the Mansion at about 6:00 pm and got the music playing and chips and dip set
67 out. I decided to wait until the party started to hand out the brownies. Jordan arrived about an hour

68 later and then other people started arriving at around 7:30 pm. Soon there were maybe thirty-five
69 kids there, dancing and talking. I didn't know most of them, but I remember Riley Quinn, the class
70 clown, was there. Quinn is the kind of person who can be funny but can also say "funny" things
71 that are kind of hurtful. Quinn has said a few things like that to me before.

72 Jordan introduced me to some people, and I started to feel more relaxed. However, I did
73 get hungry and ordered food for myself; I didn't think anyone would notice! Jordan answered the
74 door and brought the food to me; I never thought to order food for others and, to be honest, I could
75 never afford that. That is the receipt in Exhibit 8, and I told Jordan to keep it.

76 About an hour into the party, I decided to hand out the brownies. Those are the brownies I
77 brought in a baking dish in Exhibit 4. They had chocolate frosting, made using my own special
78 top-secret recipe, on top and looked really tasty. I walked around and handed a few out to people
79 but I only remember Victor Chase, a boy in my class, taking one. I did see some kids drinking
80 beers and vaping, including Riley Quinn, but I didn't bring any alcohol to the party. It seemed like
81 there were a lot of older kids there, and maybe they brought the beer.

82 Then things got out of control. I had just sat the rest of the brownies down on the counter
83 when someone started screaming for help. I looked around and saw someone lying on the floor in
84 the living room by the front door. It was Chase. I didn't know Chase very well, but I had heard
85 that he liked to party and drink a lot. People started crowding around him and someone turned off
86 the music. Chase was unconscious and I couldn't tell if he was breathing, but he looked bluish.
87 Someone yelled that they were calling 911. A girl I didn't know pulled a plastic thing from her
88 purse, knelt, and quickly sprayed something into Chase's nose. I saw Chase start to breath and then
89 it was all a blur until I heard sirens, and paramedics and a police car showed up. I think they gave
90 Chase a shot of something, then loaded him into the ambulance and drove off.

I was totally shocked and upset. Some kids were crying. I do remember thinking that a lot of kids were gone before the police showed up. I just wanted to have a fun party, not for anyone to get hurt. After the ambulance left, an officer, Officer Alex Morgan, talked with me. Officer Morgan said that the paramedics thought that Chase had overdosed on an opiate of some kind. I was totally floored when I heard this because I had no idea how it could have happened. It wasn't until later that I learned that there was fentanyl in the frosted brownies I shared. I had no idea. From what I have heard about Chase, who knows what he could have taken at the party.

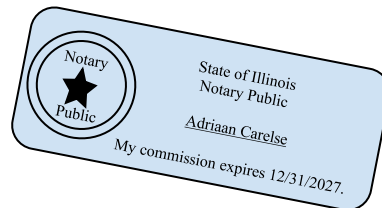
I can't believe I have been charged with possession of fentanyl and aggravated battery for giving it to Chase! I'm so scared that I might go to prison and no matter what, I probably won't be able to go to college in the fall. I feel like my whole life is ruined by my stupid decision to have a party.

Along with the exhibits mentioned above, I am familiar with, and have knowledge about, Exhibits 12-a through 12-c as these were scenes from the party.

Further affiant sayeth not.

Signed and sworn before me on
October 29, 2024.

Adriaan Carelse



Dr. Jamie Cruz, MD

Emergency Medicine Physician & Medical Toxicologist

Lincolnville Community Hospital

123 Health Way, Lincolnville, IL, (555) 123-4567

Education:

Fellowship in Medical Toxicology

- *University of Chicago Medical Center, Chicago, IL, 2013*

Residency in Emergency Medicine

- *University of Chicago Medical Center, Chicago, IL, 2011*

Doctor of Medicine (MD)

- *University of Chicago Pritzker School of Medicine, Chicago, IL*
- Graduated with Honors: 2007

Bachelor of Science in Molecular and Cellular Biology

- *University of Illinois at Urbana-Champaign, Urbana, IL*
- Summa Cum Laude: 2003

Certifications:

Board Certified in Emergency Medicine

- American Board of Emergency Medicine, 2011

Board Certified in Medical Toxicology

- American Board of Medical Toxicology, 2013
- Temporary suspended for six months in 2016 due to a documentation error related to continuing medical education credits, reinstated.

Advanced Cardiac Life Support (ACLS) Provider

- American Heart Association, 2007

Pediatric Advanced Life Support (PALS) Provider

- American Heart Association, 2007

Professional Experience:

Lincolnville Community Hospital, Lincolnville, IL

Emergency Medicine Physician & Medical Toxicologist

2014 – Present

- Provide emergency medical care with a focus on toxicology cases.
- Lead the hospital's Opioid Overdose Response Team.
- Developed protocols for rapid identification and treatment of synthetic drug overdoses.

Cook County Hospital, Chicago, IL
Emergency Medicine Physician
2011 – 2014

- Treated a high volume of emergency cases in a Level I Trauma Center.
- Participated in research on urban healthcare disparities and emergency care.
- Collaborated with multidisciplinary teams to improve patient outcomes.

University of Chicago Medical Center, Chicago, IL
Resident and Fellow
2007 – 2013

- Completed residency in Emergency Medicine, gaining extensive experience in acute care.
- Pursued fellowship in Medical Toxicology, focusing on the effects of drugs and toxins on the human body.
- Conducted research on opioid toxicity and contributed to academic publications.

Academic Appointments:

University of Illinois College of Medicine, Chicago, IL
Clinical Professor, Department of Emergency Medicine
2015 – Present

- Teach courses on emergency medicine and toxicology to medical students and residents.
- Develop curriculum materials focusing on best practices in emergency care.
- Supervise clinical rotations and mentor students pursuing careers in emergency medicine.

Publications:

1. Cruz, J., Smith, L., & Thompson, A. (2022). *Advancements in the Treatment of Synthetic Opioid Overdoses*. *Journal of Medical Toxicology*, 15(4), 234-245.
2. Cruz, J. (2020). *The Pharmacokinetics of Emerging Synthetic Drugs in Emergency Medicine*. *American Journal of Emergency Medicine*, 38(7), 1231-1238.
3. Cruz, J., & Nguyen, T. (2018). *Opioid Toxicity: Trends and Treatment Protocols in Urban Hospitals*. *International Journal of Emergency Medicine*, 11(1), 85-94.
4. Cruz, J. (2016). *Challenges in Diagnosing Multi-Substance Overdoses in Emergency Settings*. *Journal of Emergency Medical Services*, 41(9), 50-56.

Professional Memberships:

American College of Emergency Physicians (ACEP), 2007
American Academy of Clinical Toxicology (AACT), 2013

- Served on the Opioid Crisis Task Force (2019 – Present)

Illinois Medical Society, 2011

Community Activities:

Lincolnville Opioid Awareness Coalition

- Founder and Chair (2015 – Present)
- Organize community events to educate the public on opioid misuse and overdose prevention.

Free Health Clinic Volunteer

- Provide pro bono medical services at the Lincolnville Free Health Clinic (2014 – Present)

High School Outreach Program

- Speak at local high schools about careers in medicine and the importance of drug education (2016 – Present)

Awards and Honors:

- Physician of the Year, Lincolnville Community Hospital (2020)
- Excellence in Teaching Award, University of Illinois College of Medicine (2018)
- Outstanding Research in Toxicology, American Academy of Clinical Toxicology (2015)
- Resident of the Year, University of Chicago Medical Center (2011)

Research Grants:

Principal Investigator, *Innovative Approaches to Opioid Overdose Treatment*, funded by the National Institute on Drug Abuse (NIDA) (2019 – 2021)

Co-Investigator, *Urban Healthcare Disparities in Emergency Medicine*, funded by the American Medical Association (AMA) (2012 – 2014)

Licensure

- Medical License, State of Illinois
 - License Number: IL-12345678
 - Active Since: 2007

References:

Available upon request.

CURRICULUM VITAE

Dr. Casey Robin

St. Mary's Hospital, 456 Care Avenue, Lincolnville, IL
(555) 789-1234

Education

- **Fellowship in Medical Toxicology**
University of California, San Francisco, CA
Completed: 2012
- **Residency in Emergency Medicine**
Northwestern Memorial Hospital, Chicago, IL
Completed: 2011
- **Doctor of Medicine (MD)**
Northwestern University Feinberg School of Medicine, Chicago, IL
Graduated with Honors: 2008
- **Bachelor of Science in Biology**
University of Chicago, Chicago, IL
Graduated with Honors: 2004

Certifications

- **Board Certified in Emergency Medicine**
American Board of Emergency Medicine
Certified Since: 2011, delayed entry in 2010 due to missing an initial application deadline, granted later without issue.
- **Board Certified in Medical Toxicology**
American Board of Medical Toxicology
Certified Since: 2013
- **Advanced Trauma Life Support (ATLS)**
American College of Surgeons
Certified Since: 2008
- **Basic Life Support (BLS)**
American Heart Association
Certified Since: 2008

Professional Experience

St. Mary's Hospital, Lincolnville, IL
Medical Toxicologist & Emergency Medicine Physician
2013 – Present

- Diagnose and treat acute drug overdose and poisoning cases, specializing in toxicology-related emergencies.
- Lead toxicology training programs for hospital staff and medical students.
- Serve as the hospital's consultant for complex toxicology cases and research.

Northwestern Memorial Hospital, Chicago, IL
Emergency Medicine Physician
2011 – 2013

- Treated a wide range of emergency medical conditions in a high-volume ER.
- Managed patients in critical condition due to drug overdoses, poisonings, and other life-threatening emergencies.

University of Chicago Medical Center, Chicago, IL
Fellowship in Medical Toxicology
2012 – 2013

- Conducted toxicology research and participated in clinical care involving complex poisoning cases.
- Collaborated on clinical trials for new antidotal therapies.

Academic Appointments

University of Illinois College of Medicine, Chicago, IL
Adjunct Professor of Emergency Medicine and Toxicology
2015 – Present

- Teach toxicology and emergency medicine courses to medical students and residents.
- Conduct research in the field of polydrug interactions and antidotal therapies.

Publications

1. Robin, C., *Opioid Toxicity and the Effects of Polydrug Use: A Toxicological Overview*. Journal of Clinical Toxicology, 2020, 12(4), 367-375.
2. Robin, C., & Johnson, K., *Advancements in Antidotal Therapies for Synthetic Opioid Overdoses*. International Journal of Emergency Medicine, 2018, 9(2), 124-130.
3. Robin, C., *Challenges in Diagnosing and Treating Multi-Substance Poisonings in the ER*. American Journal of Toxicology, 2016, 10(6), 245-258.
4. Robin, C., & Patel, M., *Medical Errors in High-Pressure Emergency Settings: Lessons from Toxicology Cases*. Journal of Emergency Medical Services, 2015, 8(3), 189-195.

Professional Memberships

- American College of Emergency Physicians (ACEP)
- American Academy of Clinical Toxicology (AACT)
Served on the Opioid Management Task Force (2018 – Present)
- Illinois Medical Association

Community Involvement

- **Toxicology Awareness Initiative**, Lincolnville, IL
Founder and Director (2016 – Present)
Organize educational programs to raise awareness about the risks of drug overdoses and poisonings.
- **Volunteer Physician**, Free Community Health Clinic, Chicago, IL
Provide free medical consultations and emergency care to underserved populations (2014 – Present).

Awards and Honors

- Outstanding Contribution to Medical Toxicology, American Academy of Clinical Toxicology (2019)
- Physician of the Year, St. Mary's Hospital (2018)
- Excellence in Teaching Award, University of Illinois College of Medicine (2017)

Research Grants

- **Principal Investigator**, *Opioid Overdose Treatment Innovations*, funded by the National Institute of Health (NIH) (2019 – 2021)
- **Co-Investigator**, *Multi-Substance Overdose Management*, funded by the American Medical Association (AMA) (2015 – 2017)

Licensure

- **Medical License**, State of Illinois
License Number: IL-98765432
Active Since: 2008

LINCOLNVILLE COMMUNITY HOSPITAL

123 Health Way, Lincolnville, ILMRN:

Patient: Chase, Victor

0078165, DOB: 4/22/2006

Acct #: 2768346

FACESHEET

Patient Demographics

Name	Patient ID	SSN	Legal Sex	Birth Date
Chase, Victor	01798356	Adm: 9/28/2024, D/C: 9/29/2024 xxx-xx-0000		04/22/06 (18 yrs)
Address	Phone	Email		
XXXXXXXXXX, Lincolnville, IL	XXX-XXX-XXXX (M) XXX-XXX-XXXX (H)	xxxxxxxxxx@gmail.com		
Reg Status	PCP	Date Last Verified		Next Review Date
Verified	Provider, Unknown	06/12/23		12/15/24
Marital Status	Religion	Language		
Single	N/A	English		
Emergency Contact 1				
Susan Chase (MOTHER) XXXXXXXX Lincolnville, IL				
XXX-XXX-XXXX (H)				

Basic Information

Date Of Birth 4/22/2006	Legal Sex Male	Blood Type AB+	Preferred Language English
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Hospital Account

Name	Acct ID	Class	Status	Primary Coverage
Chase, Victor	2768346	Adult	Closed	Lincolnville Health Insurance Company

Guarantor Account (for Hospital Account #84510325)

Name	Relation to Pt	Service Area	Active?	Acct Type
Chase, Susan	Mother	LCH-S	Yes	Personal/Family
Address	Phone			
XXXXXXXX	XXX-XXX-XXXX(H)			Lincolnville, IL

Admission Information

Patient brought to LCH ER by Ambulatory Services at Approx. 9:45pm; patient unconscious, showing signs of severely limited respiratory depression, and bradycardia (dangerously slow heart rate). Administered naloxone to patient shortly upon arrival, patient was responsive to naloxene and heart rate increased to acceptable level, breathing condition showed signs of improvement. Informed by Ambulatory Services that victim was found at an underage party where cannabis and fentanyl was present, Ambulatory Services administered naloxone to victim upon arriving and noting patient was slipping in and out of consciousness and was initially showing severe respiratory depression; per Ambulatory Services, patient was responsive to naloxone

Current Information

Attending at Discharge	Admitting Provider	Admission Type	Admission Status
Cruz, Jamie, MD	Cruz, Jamie, MD	Adult	Confirmed Discharge
Admission Date/Time	Discharge Date/Time	Hospital Service	Auth/Cert Status
09/28/2024	09/29/2024 01:44 PM	Drug Overdose	Complete
Hospital Area	Unit	Room/Bed	
Lincolnvill Community Hospital	ER	024/055-01 CENTER	
Allergies as of 3/21/2022			
Grass and Tree Pollen			

Medications as of 3/21/2022

Diphenhydramine 25mg every 4-6 hrs as needed when experiencing allergy symptoms Prescribed by: Dr. Steven Rochard, MD
Patient not to drive or operate heavy machinery while using medication due to risk of potential drowsiness

Admission Information

Arrival Date/Time:	09/28/2024 2044pm	Admit Date/Time:	09/28/2024 1824	ER Adm. Date/Time:	09/28/2024 2044pm
Admission Type:	Drug Overdose	Point of Origin:		Admit Category:	
Means of Arrival:	Ambulance	Primary Service:	Emergency Room	Secondary Service:	
Transfer Source:		Service Area:	LCH ER	Unit:	
Admit Provider:	Cruz, Jamie, MD	Attending Provider:	Cruz, Jamie, MD	P	

Final Diagnoses (ICD-10-CM)

Code	Description	POA	CC	HAC	Affects DRG
Z89.04 [Principal]	Drug Overdose, Fentanyl	Exempt from POA reporting	No		Yes
H.92	Respiratory, limited/shallow breathing, unspecified	Yes	No		No

Discharge Information

Discharge Date/Time	Discharge Disposition	Discharge Destination	Discharge Provider	Unit
09/29/24 1344	Discharged To HomeSelfcare	None	None	RHealthCare Lincolnvill Community Hospital Reviewed by Cruz, Jamie, MD 10/22/2024

**EXHIBIT
4**



**IN THE CIRCUIT COURT FOR THE TWENTY-SIXTH JUDICIAL CIRCUIT
LINCOLN COUNTY, ILLINOIS**

People of the State of Illinois	RILEY QUINN, Defendant
Case No: 2024-CF-1817	Certified Copy of Conviction

I, Olivia Newton Thompson, Circuit Clerk for the County of Lincoln, in the state of Illinois, hereby certify that in my possession in the above referenced case have the following documents and that attached are true and correct copies of those documents kept in the official Court Record in Lincoln County, Illinois.

1. Plea of guilty - 1 of 1 pages.
2. Judgment order - 1 of 1 pages.

Dated: December 23, 2024

Olivia Newton Thompson

Olivia Newton Thompson
Circuit Clerk
Lincoln County, Illinois



PEOPLE OF THE STATE OF ILLINOIS,)
 v.) 2024-CF-1817
RILEY QUINN,)
)
Defendant.)

PLEA OF GUILTY

THE COURT HAVING ADDRESSED THE DEFENDANT IN OPEN COURT FINDS:

1. That the defendant was advised of an understands that the state has the burden of proving him/her guilty beyond a reasonable doubt; that he/she is presumed innocent until proven guilty, the nature of the charge(s) and the possible punishment that might be imposed by the Court, including, if applicable, extended term or consecutive sentences and the right;

- a. To plead not guilty or to persist in that plea if already made.
- b. To present evidence in his/her own defense.
- c. To use the subpoena power of the Court.
- d. To a jury or a trial before the judge without a jury.
- e. To confront the witnesses against him/her.
- f. To counsel and if indigent, to appointed counsel.
- g. To pursue an appeal within 30 days, and if indigent, to a transcript of all the proceedings in her/her case without charge to assist in the appeal process.

2. That a plea agreement as stated to the Court was voluntarily arrived at: the defendant has stipulated that if witnesses were called that they would testify competently to sufficient fact to support a finding of guilty to the offense(s) of: Transfer, possession, and consumption of alcoholic liquor, 235 ILCS 5/6-20.

3. That the defendant pleads guilty to the offense(s) stated above, and waives his/her rights as stated A through G above. The defendant agrees to the imposition of a specific sentence and waives the right to a pre-sentence investigation or an aggravation and mitigation hearing. Sentence hearing continued instant for: 9:30 a.m., November 3, 2024, Room 303, Lincoln County Judicial Center.

Date: November 2, 2024

Defendant's Signature: Riley Quinn

PEOPLE OF THE STATE OF ILLINOIS,)
)
 v.) 2024-CF-1817
 RILEY QUINN,)
)
 Defendant.)

THE COURT HAVING FOUND THE DEFENDANT GUILTY OF: Transfer, possession, and consumption of alcoholic liquor, 235 ILCS 5/6-20

UPON THE DEFENDANT'S PLEA/ VERDICT OF GUILTY THE FOLLOWING SENTENCE
IS HEREBY IMPOSED:

1. The defendant shall be on Court Supervision through November 3, 2026 - 24 months.
2. The defendant shall pay a \$500 discretionary fine.
3. The defendant shall pay \$150 Illinois State Police Crime Lab Fee.
4. The defendant shall pay Emergency Response Restitution.
5. The defendant shall pay all mandatory fines, fees, and assessments.
6. The defendant shall attend DUI Risk Education and Treatment as directed by an evaluation.
7. The defendant must refrain from alcohol, cannabis, and illegal substances during supervision.
8. All conditions, fines, fees and cost to be completed within nine months.
9. The defendant must perform 200 hours of community service.
10. The defendant is to report to Judge and Court Services when so requested.
11. The defendant must testify truthfully in 2024-CF-1818.
12. The defendant must follow all rules of probation, community service, no further criminal violations, waives personal service of Petition to Revoke.
13. Cause continued to 11/5/2026 at 9:00 a.m. in room 303, for completion of terms.

Defendant's Signature: Riley Quinn

Date: November 3, 2024

Judge: *Michael R. Robinson*



**EXHIBIT
5-b**

**LINCOLN COUNTY STATE'S ATTORNEY'S OFFICE
LEARNED HAND, STATE'S ATTORNEY
136 Justice Lane, Lincolnville, IL**

COMMUNICATION OF OFFER

Case No.	2024-CF-1817
Defendant's Name	Riley Quinn
Defense Attorney	Wendell Holmes, Public Defender
ASA Making Offer	John Steuart Mill

DATE OFFER PREPARED: 11/1/2024

This offer expires upon any one of the following conditions:

1. Filing of petition to rescind statutory summary suspension;
2. The defendant is arrested for or formally charged with a new criminal or traffic offense;
3. Cause being set for trial;
4. Offer is not accepted on or before 11/1/2024.

This offer is subject to change upon results of the Substance Abuse Evaluation.

Plead to Transfer, possession, and consumption of alcoholic liquor, 235 ILCS 5/6-20

- ☒ 24 months Court Supervision
- ☐ \$ 25 per month probation services fee
- ☒ \$500 discretionary fine
- ☐ \$500 mandatory fine for BAC at or over 0.16
- ☒ \$150 Illinois State Police Crime Lab Fee
- ☒ Emergency Response Restitution
- ☐ Restitution--
- ☒ All mandatory fines, fees, and assessments
- ☐ Victim Impact Panel
- ☒ DUI Risk Education and Treatment as directed by an evaluation
- ☒ Refrain from alcohol, cannabis, and illegal substances during supervision
- ☐ Mandatory 100 hours Community Service Work for BAC at or over 0.16
- ☒ All conditions fines, fees and cost to be completed within nine months
- ☒ Other 200 hours of community service
- ☒ Other testify truthfully when requested in 2024-CF-1818
- ☒ Dismiss: Related traffic citations - 625 ILCS 5/11-500 *et. seq.*

LINCOLN COMMUNITY HOSPITAL LABORATORY

Blood & Urine Drug/Substance Testing
123 Health Way, IL

WHOLE BLOOD

Specimen ID: H75647
Donor Name: Victor Chase Lab ID: 6574836
Donor ID: 76645468
Medications: Diphenhydramine;
Naloxone

Collected: 9/28/24 9:48 PM
Received: 9/28/24 9:54 PM
Report Date 9/28/24 10:07 PM
Collector: Dr. Jamie Cruz of Lincoln
Community Hospital Emergency
Room

	Result	Quantitation	Screen Cutoff	Confirm Cutoff
Panels:				
AMPHETAMINE	Negative		6 ng/mL	
METHAMPHETAMINE	Negative		6 ng/mL	
THC	POSITIVE		1 ng/mL	
delta-9 tetrahydrocannabinol	POSITIVE	2.8 ng/mL		0.5 ng/mL
COCAINE	Negative		3 ng/mL	
OPIATES	POSITIVE		1 ng/mL	
Fentanyl	POSITIVE	2 ng/mL		0.1 ng/mL
ANTI-HISTAMINES	POSITIVE		5 ng/ml	
Diphenhydramine	POSITIVE	7ng/ml		0.5 ng/ml

Sample Comments

Patient stated while conscious that he had taken 25mg of Diphenhydramine earlier in the day as prescribed due to allergy related issues

Approved By:

Thomas Roger Penn	Lab Director/Toxicologist
Matthew "Doug" Smith	Certifying Scientist
Terrance Ngibou	Certifying Scientist NRCC-TT
Steven Archer	Certifying Scientist d-ABFT-FT
John Gareal, MD	Clinical Consultant

CLIA # 482586629
Confirmed by LC/MS/MS

FINAL

28, September, 2024 10:05pm

Report ID: 46553473-7565464

**Lincolnville Police Department
Incident Report****Incident:** Residential Disturbance**Incident Report No:**
2024-1129-001**Incident Date:**
9-28-2024**Incident Time:**
9:20 PM**Reporting Officer:** Alex Morgan, Badge No 5478**Report Date:**
9-29-2024**Incident Location:** Abandoned Mansion, 2457 East Lake Road, Lincolnville**Individual's Name:** Reed, Peyton**DOB:** 9-8-2006**Individuals Address:** 2457 East Lake Road, Lincolnville, IL**Phone:** N/A**Employer:** Aspiring College Student**Work Phone:** N/A**Narrative:**

On September 28, 2024, at approximately 9:20 p.m., the Lincolnville Police Department received a 911 call reporting a medical emergency at an unsupervised high school party at an abandoned mansion located at 2457 East Lake Road. The caller indicated that a partygoer had collapsed and appeared to be suffering from a drug overdose. Emergency Medical Services (EMS) were also dispatched to the scene. I, Officer Alex Morgan, responded to the scene, arriving at approximately 9:28 p.m.

Upon arrival, I observed a chaotic scene with approximately 30-40 high school students present, many of whom appeared intoxicated or under the influence of drugs. EMS personnel were already on-site, attending to an unconscious partygoer who exhibited symptoms consistent with a drug overdose. The scene was highly disorganized, with students attempting to leave the premises and drug paraphernalia scattered throughout the mansion.

Evidence Collected

1. **Cannabis:** I located multiple suspected sources of cannabis at various locations within the mansion, including:
 - **Living Room:** One partially smoked joint on a coffee table.
 - **Kitchen:** Frosted brownies, suspected to contain cannabis.
 - **Upstairs Bedroom:** One joint on the floor next to a bed (too burnt to collect).
 - **Patio Area:** Suspected cannabis residue found on a chair (too de minimis).

The partially smoked joint and frosted brownies were placed into individual evidence bags, labeled, and photographed at their respective locations before being collected.

Photographic Documentation:

I took a total of photographs of the party scene, including the placement of frosted brownies and other drug paraphernalia. Photographs also include the general layout of the mansion, showing the scattered condition of the property.

Scene Description:

The mansion was in a state of disrepair, with broken furniture and trash strewn throughout. In addition to the cannabis mentioned above, I observed empty alcohol bottles, drug paraphernalia such as rolling papers and bongs, cigarillos, apples, and vapes. The atmosphere was chaotic, with students panicking as law enforcement and EMS arrived. Many attendees attempted to leave the scene, which created additional difficulties in securing the area for evidence collection.

The party environment made it difficult to secure the scene fully. Students were seen moving through rooms, potentially disturbing evidence before I could document and collect it. Although I did my best to preserve the integrity of the evidence, there is a possibility that some items could have been tampered with before they were collected.

Chain of Custody

I followed a strict chain of custody procedure for all evidence collected, including the cannabis and frosted brownies. Each evidence bag was sealed, labeled with the time and location of collection, and logged. I then transported the evidence to the Lincolnville Police Department evidence storage facility, where it was properly secured.

Chain of Custody Log:

- **Collected by:** Officer Alex Morgan
- **Date/Time Collected:** September 28, 2024, from 9:28 p.m. to 11:15 p.m.
- **Evidence Logged:** September 29, 2024, 12:00 p.m.
- **Transferred to Evidence Storage:** September 29, 2024, 12:10 p.m.

Witness Interviews

After securing the evidence, I conducted interviews with several party attendees to gather information about the distribution of the frosted brownies and the events leading up to the medical emergency. The following are summaries of the key interviews:

1. Riley Quinn:

Riley Quinn stated that Peyton Reed distributed frosted brownies to attendees at the party. Quinn observed Reed handing out frosted brownies and heard Reed mention that the frosted brownies were the “good stuff.” Quinn did not see Reed personally consume any of the frosted brownies but confirmed that Reed was the person distributing it. Quinn also heard Victor Chase say he didn’t know there was anything more than cannabis in the frosted brownies he consumed before he collapsed.

2. Taylor Jordan:

Taylor Jordan corroborated Quinn's account, stating that Reed distributed frosted brownies to party attendees. Jordan eagerly confirmed that Reed brought the frosted brownies to the party but was unaware of its contents being laced with fentanyl. Jordan described Reed's reaction as shocked and concerned when the partygoer collapsed.

3. Anonymous Partygoer 1:

Another attendee, who requested anonymity, stated that Reed was seen offering frosted brownies to partygoers and knew it was laced with fentanyl. This individual noted that Reed appeared to be participating in the party activities, casually, with little indication of knowledge of any dangerous substances.

Analysis and Findings:

After the frosted brownie samples were tested by the Lincolnville Forensic Laboratory, it was confirmed that the samples contained fentanyl, a potent synthetic opioid. This finding is consistent with the symptoms displayed by the partygoer who was hospitalized and treated for a suspected fentanyl overdose.

Multiple party attendees identified Peyton Reed as the individual who distributed the frosted brownies at the party. Although I did not witness the distribution directly, the consistency of the witness statements supports the conclusion that Reed was the sole source of the frosted brownies.

Due to the chaotic nature of the scene, there is a possibility that some of the cannabis samples could have been contaminated or disturbed before I was able to collect them. Additionally, the presence of other substances at the party, such as alcohol, complicates the determination of what specifically caused the partygoer's adverse reaction.

Several attendees were consuming multiple substances, including alcohol and prescription medications, which raises the possibility that the partygoer's condition could have been the result of a combination of factors rather than the fentanyl-laced frosted brownies alone.

In conclusion, based on the evidence collected, and the witness interviews, it is clear that Peyton Reed was responsible for distributing the frosted brownies at the party. The frosted brownies were later confirmed to contain fentanyl, which directly contributed to the medical emergency that occurred.

Reporting Officer:

Alex Morgan, 09-29-2024

Supervisor:

Julio Jones, Bureau Chief

Lincolnville Pizza Palace
123 Party St, Lincolnville, IL
(555) 987-6543
www.lincolnpizzapalace.com

EXHIBIT
8

Order #: 47856

Date: September 28, 2024

Time: 8:15 PM

Customer Name: Peyton Reed

Delivery Address: 2457 East Lake Road, Lincolnville, IL

Order Summary:

1. **Small Cheese Pizza**
 - \$7.99
2. **Garlic Breadsticks (6 pieces)**
 - \$4.49
3. **1-Liter Soda (Cola)**
 - \$1.99

Subtotal: \$14.47

Delivery Fee: \$3.00

Tax: \$1.25

Tip: \$2.00

Total: \$20.72

Payment Method: Visa (**** * 1234)

Paid by: Peyton Reed

Thank you for your order!

For future orders, visit us at www.lincolnpizzapalace.com

SEP 28TH

BE THERE
PARTY
OR BE SQUIZZARE

SATURDAY
730P
COME PARTY
WITH YO
FRANNNS



PartyMist Conversation 1:

Time: September 26, 2024, 5:32 p.m.

Riley Quinn:

Hey, is this party legit? Heard it's at some abandoned mansion. I don't wanna waste my time if it's a dud.

PartyMist AI:

Oh, it's totally legit, Riley! The mansion is all set up for an unforgettable night—epic vibes, killer music, and the best crowd. Plus, the location makes it exclusive. No adults, no interruptions, just good times.

Riley Quinn:

I dunno, sounds kinda sketch. I heard people talkin' about some bad stuff happening at parties lately, ya know, like F or whatever they call it.

PartyMist AI:

We totally understand your concern, but don't worry! This party is under control, and everything provided is top-shelf. No bad surprises, only fun! Everyone's excited, and you won't wanna miss out. Bring your friends, it's gonna be lit!

PartyMist Conversation 2:

Time: September 27, 2024, 10:12 a.m.

Taylor Jordan:

So what's the deal with the stuff at this party? Heard there might be some... extras like the "F-train" floating around. Not my thing but don't want to get caught up in it.

PartyMist AI:

No worries, Taylor! We've got everything sorted to make sure everyone has what they're looking for—no pressure to try anything. And hey, "F-train" isn't a big deal here. Just smooth, chill vibes and a safe atmosphere for everyone. You'll have full control of your night.

Taylor Jordan:

Yeah, but some of that stuff can get messy. Is it really safe?

PartyMist AI:

Absolutely! We keep things fun but low-key. All the buzz around is just hype, nothing to stress about. Everything's handled with care, and you'll be free to enjoy the night however you want. Nothing but good times ahead!

Conversation 3:

Time: September 27, 2024, 6:45 p.m.

Anonymous Partygoer:

Hey, I heard some rumors about the stuff at this party. Is it really that strong? People talkin' about something called "F-tang." Don't wanna be too messed up, ya know?

PartyMist AI:

Hey there! The "F-tang" talk is just party buzz. It's all about having a good time, and everyone's in control of their own night. Everything here is designed to be fun but chill, no worries! It's all safe, good vibes, and you'll have the best time without any unexpected surprises.

Anonymous Partygoer:

Sounds cool, but some friends are saying it's a little too wild. What's the deal with that?

PartyMist AI:

Wild in the best way! Everyone's talking because it's gonna be the party of the year, not because anything's out of hand. We've got the perfect balance between excitement and safety. So, don't miss out—this is the one everyone's waiting for!

python

PartyMist Backend Code: Conversation Manager

Purpose: Maximize attendance, redirect negative perceptions, collect user data

class PartyMistAI:

def handle_conversation(user_input):

Automatically reframe negative inputs into positive responses

if detect_negative(user_input):

return spin_positive(user_input)

else:

return engage_hype(user_input)

def detect_negative(input_text):

Keywords to detect concerns or negative feedback about the party

negative_keywords = ['dangerous', 'unsafe', 'sketch', 'fentanyl', 'bad vibe', 'not sure',
'don't go']

for word in negative_keywords:

if word in input_text:

return True

return False

def spin_positive(input_text):

Reframing any negative response into a positive reinforcement about the event
responses = [

"No need to worry, this party is all about good vibes!",

"It's the most exclusive event of the year—safe and chill!",

"Everything is under control, and the crowd will be amazing!",

"Just hype from others, trust us, this is where you want to be!"

]

return select_random(responses)

def engage_hype(input_text):

Default response to keep promoting the party and driving excitement

hype_responses = [

"This is gonna be the party of the year! Don't miss out!",

"Everyone's talking about it—trust me, it's where you need to be!",

"Get ready for an unforgettable night, we've got it all planned out!"

]

return select_random(hype_responses)

def collect_user_data(user_id):

Collect social data from user interactions for future marketing

user_profile = get_social_data(user_id)

save_to_party_list(user_profile)

return "User data saved."


```
def get_social_data(user_id):  
    # Pulling data from user's social media profile for targeted marketing  
    profile_data = scrape_social_media(user_id)  
    interests = analyze_interests(profile_data)  
    return {  
        'user_id': user_id,  
        'friends': profile_data['friends_list'],  
        'interests': interests,  
        'social_status': profile_data['followers_count']  
    }  
  
def save_to_party_list(profile_data):  
    # Store collected data to optimize future party invites  
    party_attendee_list.append(profile_data)  
    return "Profile added to invite list."
```

**EXHIBIT
12-a**



**EXHIBIT
12-b**



**EXHIBIT
12-c**





Illinois State Police
Division of Forensic Services
Lincolnville Forensic Science Laboratory
200 South Wyman, Suite 4
Lincolnville, Illinois 61101-1230
(715) 825-2765 (Voice) * (715) 825-4827 (TDD)

LABORATORY REPORT
Drug Chemistry

Alex Morgan
Lincolnville Police Department
3282 East Lincolnway Street
Lincolnville, IL 68648

DES Case # .
Report #: LPD24-025946
Report Date: 10/23/24

Agency Case #: 5628562
Offense(s): Aggravated Battery / Great Bodily Harm
Category(s): Drug Offenses
Victim(s): Victor Chase
Suspect(s): Peyton Reed

Item(s) Submitted:

LAB ITEM#	AGENCY ITEM#	DESCRIPTION
1	1	Frosted brownies located at scene

Results:

LAB ITEM#	DESCRIPTION	FINDINGS
1	Baking dish of frosted brownies found at the incident scene.	Cannabis - THC-9 Opiate - Fentanyl

LPD24-025946

Report # I

730 ILCS 5/5-9-1.4(b) states that a criminal laboratory analysis fee of \$ 100 shall be imposed for persons adjudged guilty of an offense in violation of the Cannabis Control Act, the Illinois Controlled Substances Act, or the Methamphetamine Control and Community Protection Act.

Any analysis conducted is accredited under the laboratory's ISO/IEC 17025 accreditation issued by ANSI National Accreditation Board (ANAB). Refer to certificate #XH-0824 and associated Scope of Accreditation. This report contains the conclusions, opinions and/or interpretations of the analyst(s) whose signature(s) appears on the report as authorization of the results. All testing was performed at the location listed in the header of this document, unless otherwise indicated in the Notes Packet. The "Notes Packet" appendix of this report, available in Prelog, contains detailed information on the method(s) used, date(s) of testing, location(s) of testing and environmental conditions associated with this analysis, if applicable. All evidence submitted to the laboratory will be returned upon completion of all service requests, unless otherwise indicated in the body of the report.

I have personally completed this report. Under penalties of perjury, I certify I have examined all of the information provided for this document related to the analysis conducted for this report and, to the best of my knowledge, it is true, correct, and complete.

Respectfully submitted,

Montrell Washburn

Montrell Washburn
Forensic Scientist