

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

BRIGHTER IMAGE LAB, INC.,

Plaintiff,

v.

**SHINY SMILE VENEERS, LLC AND
THE GIDDYUP GROUP, INC.,**

Defendants.

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CIVIL ACTION NO. _____

**COMPLAINT AND APPLICATION FOR TEMPORARY AND PERMANENT
INJUNCTION RELIEF**

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW, Plaintiff Brighter Image Lab, Inc. (“Plaintiff”), and files this, its Complaint and Application for Temporary and Permanent Injunctive Relief, complaining of and against Defendants Shiny Smile Veneers, LLC and The GiddyUp Group, Inc. (collectively hereinafter referred to as the “Defendants”), and, for cause, would show unto this Honorable Court as follows:

PARTIES

1. **Plaintiff Brighter Image Lab, Inc.** (“Brighter Image” and/or “Plaintiff”) is a Texas Corporation based in Tarrant County, Texas. Brighter Image’s citizenship is attributed to the citizenship of its sole member Bil Watson. Bil Watson’s citizenship is in the state of Texas. Therefore, Plaintiff’s citizenship is in Texas.

2. **Defendant Shiny Smile Veneers, LLC** (“Shiny Smile Veneers”) is a Texas Limited Liability Company with its principal place of business located at 8875 Hidden River Parkway Suite 300, Office 365, Tampa, Florida 33637. Shiny Smile Veneers also maintains and

utilizes a business address located at 1110 Commerce Dr., Richardson, Texas 75081 from which it conducts or facilitates business operations within the State of Texas. Shiny Smile Veneers may be served with process by serving its registered agent, United States Corporation Agents, Inc. at 476 Riverside Avenue, Jacksonville, Florida 32202, or the Florida Secretary of State, Division of Corporations at 2415 North Monroe Street, Suite 810, Tallahassee, Florida 32399, as its agent for service. Shiny Smile Veneers has continuous and systematic contacts with Texas as it maintains a website accessible in Texas promoting its products and services, for which it accepts payments from Texas and ships products to Texas, and maintains a business presence in Richardson, Texas. Shiny Smile Veneers' citizenship is attributed to the citizenship of its members Amr Hamed who is a citizen of the State of Florida and Mohamad Shamseldin who is a citizen of the State of Texas. Therefore, Defendant Shiny Smile Veneers citizenship is in Florida and Texas.

3. **Defendant The GiddyUp Group, Inc.** ("GiddyUp Group") is a Delaware corporation with its principal place of business located at 20 North Oak Street, Ventura, California 93001. GiddyUp Group may be served with process by serving its registered agent, 1505 Corporation, Capital Corporate Services, Inc. at 455 Capitol Mall Complex Suite 217, Sacramento, California 95814, or the California Secretary of State at 1500 11th Street, Sacramento, California 95814, as its agent for service because GiddyUp Group engages in business in Texas but does not maintain a regular place of business in Texas or a designated agent for service of process. Further, GiddyUp Group has continuous and systematic contacts with Texas as it maintains a website accessible in Texas promoting its products and services which states GiddyUp Group "acquired 10 million+ customers in 30 countries."

Misnomer/Alter Ego

4. In the event any parties are misnamed or are not included herein, it is Plaintiff's contention that such was a "misidentification," "misnomer," and/or such parties are/were "alter egos" of parties named herein. Alternatively, Plaintiff contends that such "corporate veils" should be pierced to hold such parties properly included in the interest of justice.

JURISDICTION & VENUE

5. This Court has personal jurisdiction over Defendants because Defendants are businesses that conduct business in Texas and Defendants have minimum contacts with Texas relating to the events giving rise to Plaintiff's claims.

6. Defendants, at all times relevant herein have transacted business with Texas, Texas has a substantial interest in providing a forum and jurisdiction over Defendants, and jurisdiction over Defendants does not violate traditional notions of fair play and substantial justice as Defendants have purposefully availed themselves to the privileges of conducting activities with Texas, thus subjecting themselves to jurisdiction by Texas courts.

7. Further, the Defendants established minimum contacts in Texas (the forum state) by acting and taking advantage of the privilege of conducting activities within Texas, thus invoking the benefits and protections of Texas' laws. On the facts present in this case, and under the minimum contacts analysis, the nonresident Defendant and resident Defendant in this case had substantial connection with Texas arising from actions and conduct that the Defendants purposefully directed toward the State of Texas and the Plaintiff. Personal jurisdiction exists over all of the Defendants because (1) the causes of action pled in the Plaintiff's Original Complaint arise out of and relate to the Defendants' contacts with Texas, giving rise to specific jurisdiction; and (2) the Defendants' contacts with Texas are continuing and systematic, giving rise to general

jurisdiction.

8. This Court has original subject-matter jurisdiction over Plaintiff's Lanham Act claims under 28 U.S.C. §§ 1331 and 1338(a), because those claims arise under the laws of the United States, specifically the Lanham Act, 15 U.S.C. § 1051 et seq. This Court has supplemental jurisdiction over Plaintiff's related state-law claims under 28 U.S.C. § 1367(a), because those claims are so related to the federal claims that they form part of the same case or controversy.

9. Venue is proper in this Court under 28 U.S.C. § 1391(b)(2) because a substantial part of the events or omissions giving rise to Plaintiff's claims occurred in this District. Venue is also proper in this Court under 28 U.S.C. § 1391(b)(3) because the Defendants are subject to this Court's personal jurisdiction and due to the nature of this action, this case is not limited to one judicial district in which a substantial part of the events or omissions giving rise to this claim occurred.

PRELIMINARY STATEMENT

10. In this digital age, marketing is a powerful tool that shapes thoughts, consumer behavior, influences perceptions, and ultimately drives business success. Unfortunately, in the pursuit of big profit and rapid growth, some marketers resort to unethical practices that violate moral principles, laws, or industry standards, often with the intent of gaining an unfair advantage or misleading consumers in an effort to gain a quick buck over long-term relationships and societal well-being. Fortunately, the law protects its citizens from this type of conduct; and, the Plaintiff Brighter Image brings this lawsuit to address the harm caused by the Defendants to itself, the consumers, other competitors, and the integrity of the industry as a whole.

11. This action arises from Defendants' deliberate and coordinated scheme to market and sell competing snap-on veneer products by falsely creating the appearance that licensed dental

professionals and independent organizations endorsed, recommended, or were affiliated with Defendants and their products. To accomplish this unlawful scheme, Defendants acted individually and in concert through multiple corporate entities, corporate shells and individuals to create and disseminate fabricated and/or AI-generated dental personas, false professional credentials, fictitious endorsements, misleading review websites, sham organizations, and nationally distributed press releases designed to manufacture credibility and consumer trust where none existed. The scheme was implemented across numerous websites, advertisements, social media platforms, press releases, and other marketing channels, reflecting sustained and coordinated effort to deceive consumers on a nationwide scale.

12. This case is not about aggressive marketing or ordinarily competitive advertising. It concerns Defendants' deliberate fabrication of professional authority, independent credibility, and consumer trust to influence purchasing decisions, divert sales from a direct competitor, and obtain an unlawful competitive advantage through false and misleading commercial representations.

13. Defendants did not stop at deceiving consumers about the source and credibility of their advertising. They also targeted Brighter Image by making false and misleading comparisons to Brighter Image's products, copying and misappropriating Brighter Image's copyrighted materials and other protected intellectual property, and using deceptive advertising to divert consumers away from Brighter Image and toward Defendants' competing products. Through these acts, Defendants sought to exploit Brighter Image's reputation and goodwill while obtaining an unfair competitive advantage in the marketplace.

14. Defendants' conduct was not an isolated misrepresentation or an inadvertent mistake. It was a coordinated, nationwide marketing campaign intended to influence consumer

purchasing decisions through false claims of professional authority, independent validation, and superior product quality. By fabricating the appearance of dental expertise and third-party credibility, Defendants deceived consumers and unfairly competed against businesses that market their products honestly and lawfully.

15. This action seeks to hold Defendants accountable for violations of the Lanham Act, copyright infringement, unfair competition, and related violations of federal and state law. Brighter Image seeks injunctive relief, monetary damages, disgorgement of Defendants' profits, enhanced damages where authorized, attorneys' fees and costs where recoverable, and all other relief to which Brighter Image is entitled.

FACTS

16. Brighter Image is a business that manufactures and sells custom-made removable snap-on veneers directly to consumers.

17. Shiny Smile Veneers holds itself out as a direct competitor of Brighter Image in the market for custom-made removable snap-on veneers. Shiny Smile Veneers represents to consumers nationwide that they offer products substantially similar to those sold by Brighter Image. In reality, upon information and belief, Shiny Smile Veneers do not sell products that are substantially similar in design, quality, or performance to Brighter Image's custom-made removable snap-on veneers, despite marketing them as comparable alternatives.

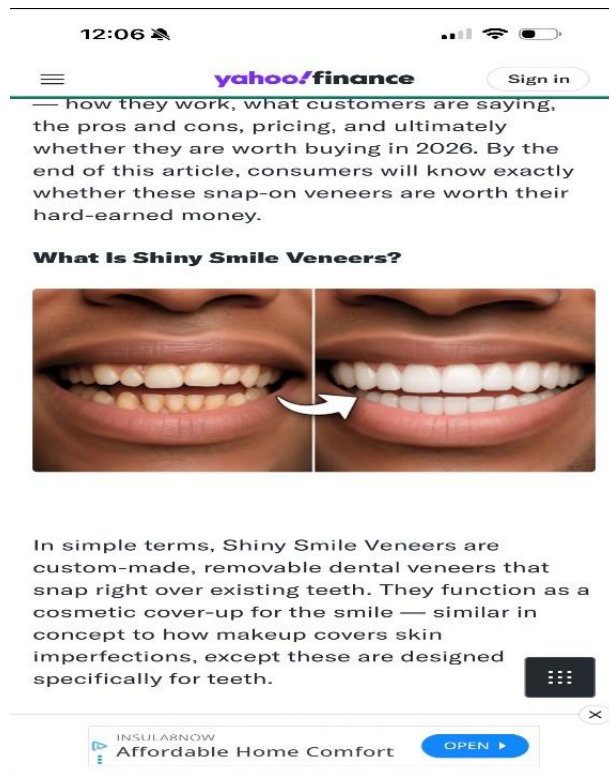
18. GiddyUp Group provides advertising, marketing, website management, and digital promotional services for Shiny Smile Veneers, including creating, managing, and disseminating deceptive online advertisements and promotional content designed to increase consumer purchases.

19. During September and October of 2025, Brighter Image observed a significant and unexplained decline in financing applications and completed transactions associated for its product. During this same period, Defendants implemented an aggressive nationwide digital advertising campaign promoting Shiny Smile Veneers across multiple online platforms, including search engines and social media. Unfortunately, it was not a normal marketing campaign, it was an unethical marketing campaign based on deceptive, manipulative, and harmful tactics.

20. Prior to this unethical marketing campaign, Shiny Smile Veneers maintained only a relatively limited online advertising presence. Following Defendants coordinated deceptive marketing efforts, Shiny Smile Veneers through its smoke and mirrors campaign rapidly increased its advertising volume, internet visibility, and consumer reach through paid advertisements, sponsored search results, social media campaigns, affiliate marketing, and comparison websites.

21. Beginning in late 2025 and continuing throughout 2026, Defendants disseminated numerous advertisements, promotional materials, websites, videos, and other marketing content that falsely and/or misleadingly represented the quality, effectiveness, endorsements, and professional support for Shiny Smile Veneers' products.

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These representations were made for the purpose of influencing consumers' purchasing decisions and diverting customers from competitors, including Brighter Image.

22. Shiny Smile Veneers, through its owner and co-founder, Mohamed Shamseldin, with the assistance and encouragement of Giddy-up, have orchestrated a deceptive marketing campaign that portrays Shiny Smile Veneers, its founders, reviewers, endorsers, and affiliated organizations as being associated with licensed dentists or other qualified dental professionals. Through Defendants' websites, advertisements, social media, press releases, and other promotional materials, Defendants represent that Shiny Smile Veneers and its products are developed, supervised, approved, or endorsed by licensed dental professionals and/or legitimate associations, when, upon information and belief, those representations are false.

23. Upon information and belief, Defendant Mohamed Shamseldin has publicly represented himself under the fictitious name "Dr. Shams El Dean," portraying that persona as a licensed dentist and co-found of Shiny Smile Veneers. In doing so, Mohamed Shamseldin has

sought to create the false impression that Shiny Smile Veneers is owned, operated, developed, and/or supervised by a licensed dental professional.

24. As part of the same deceptive marketing scheme, Defendants have also used other purported dental personas, including “Dr. Henry Dean,” identifying such individuals as founders, operators, or leading dental professionals associated with Shiny Smile Veneers¹ in order to manufacture professional credibility and induce consumers to purchase their products.

25. Brighter Image has conducted a reasonable investigation, including searches of publicly available dental licensing records maintained by state dental licensing authorities throughout the United States. Upon information and belief, those searches revealed that Mohamed Shamseldin is not, and has never been, licensed to practice dentistry in any jurisdiction within the United States. Likewise, Plaintiff’s investigation has revealed no verifiable evidence that purported dental personas presented by Defendants—including “Dr. Shams El Dean” and “Dr. Henry Dean”—possesses the professional licenses, credentials, or qualifications² represented in Defendants’ advertising. Rather, Defendants have used these fictitious identities and representations to falsely convey that Shiny Smile Veneers is owned, operated, or supervised by licensed dental professionals, thereby increasing consumer confidence, influencing purchasing decisions, and unfairly competing against Plaintiff and other businesses that market their products truthfully.

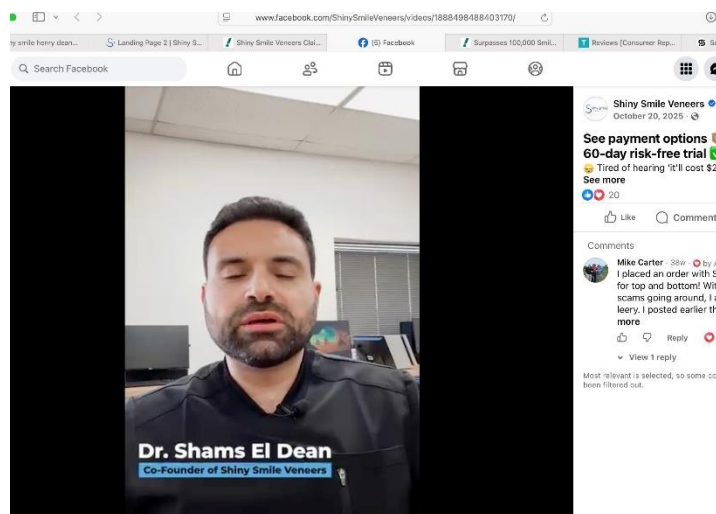
26. Defendants have continued to feature Mohamed Shameldin’s fictitious “Dr. Shams El Dean” persona and other purported dental professionals³ throughout their websites,

¹ Dental Profiles for Shiny Smile Veneers attached as **Exhibit “A”** are fully incorporated herein by reference as if set forth below.

² Dental License Searches for Shiny Smile Veneers’ Dental Profiles attached as **Exhibit “B”** are fully incorporated herein by reference as if set forth below.

³ See **Exhibit “A.”**

advertisements, review platforms, press releases, and promotional materials, despite the absence of any verifiable professional licensure.⁴



Upon information and belief, this conduct is part of a deliberate and ongoing scheme to mislead consumers regarding the professional qualifications, authority, and credibility behind Shiny Smile Veneers and its' products.

27. Defendants have further promoted Shiny Smile Veneers by citing purported endorsements, recommendations, or support from doctors, dentists, medical professionals, charitable foundations, non-profit organizations, and other authoritative sources.⁵ However, these organizations or individuals are either fictitious, unqualified, or lack any proper licensing or credentials to give authorized endorsements or recommendations on veneer products.⁶ This practice is commonly called online shilling or astroturfing.

⁴ See **Exhibit "B."**

⁵ Dental Profiles from Endorsements attached as **Exhibit "C"** are fully incorporated herein by reference as if set forth below.

⁶ Dental License Searches for Dentist Endorsements attached as **Exhibit "D"** are fully incorporated herein by reference as if set forth below.

28. Among these purported organizations is an entity identified as the “Ontario Society Health & Fitness” (“OSHF”). Through its website and related promotional materials, OSHF represents that it is a non-profit health organization that works in tandem with the Canadian Society for Exercise Physiology (“CSEP”). Defendants rely upon these representations to create the appearance that OSHF is a legitimate, independent organization with professional expertise and authority to evaluate health related products.

29. Upon information and belief, Defendants have used OSHF and Substantially similar organizations and branding, including entities identified as the “Oral Health and Smile Foundation” and the “Oral and Senior Health Foundation,” each of which claims to operate under the name or acronym “OSHF.” These purported organizations present themselves as independent health or oral health authorities capable of evaluating and rating veneer products based upon reviews or qualifications from doctors and other health care professionals.⁷

30. Plaintiff’s investigation, including review of publicly available websites and related materials, has revealed no verifiable evidence that these purported organizations are legitimate independent healthcare organizations, that they maintain recognized authority within the dental industry, or that their purported reviews are based upon evaluations by qualified dental professionals.⁸

31. Upon information and belief, Defendants created, promoted, or relied upon these purported organizations to manufacture the appearance of independent third-party validation and to mislead consumers into believing that Shiny Smile Veneers’ products have been reviewed, rated, or endorsed by legitimate healthcare professionals and organizations. By presenting these

⁷ OSHF Entities attached as **Exhibit “E”** is fully incorporated herein by reference as if set forth below.

⁸ OSHF Dental License Searches attached as **Exhibit “F”** is fully incorporated herein by reference as if set forth below.

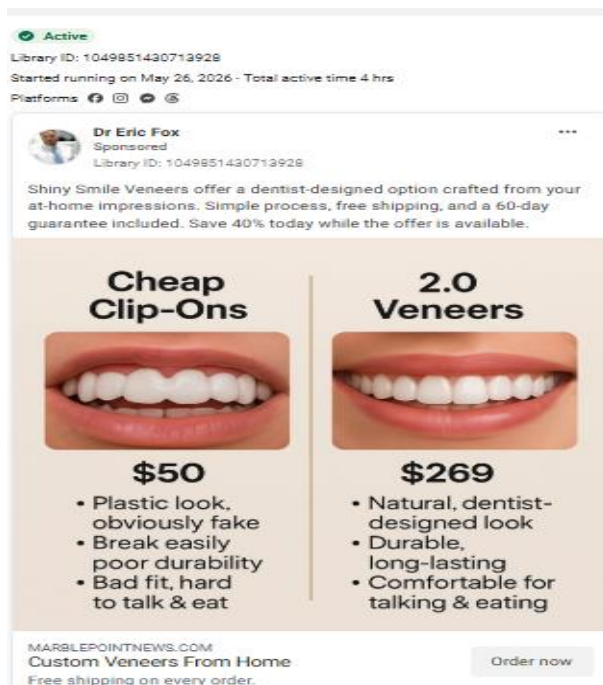
marketing materials as independent evaluations rather than commercial promotional content, Defendants sought to increase consumer trust, influence purchasing decisions, and obtain unfair competitive advantage.

32. To further evidence the astroturfing, Defendants created and distributed numerous advertisements containing AI-generated videos, fabricated customer testimonials, and influencer-style endorsements portraying individuals as actual customers or product users when many of those individuals are fictional, computer-generated, or otherwise have not used Shiny Smile Veneers' products. These artificial intelligence ("AI")-generated advertisements include purported customer testimonials describing specific medical and therapeutic benefits allegedly resulting from use of Shiny Smile Veneers' products, including claims that users experienced relief from jaw pain, reduced teeth pain, improved oral health, or other health-related benefits. These claims are false, misleading, unsupported by competent scientific evidence, and designed to induce customers to purchase Shiny Smile Veneers' products.

33. Defendants have disseminated these false and/or misleading advertisements through thousands of paid marketing placements on internet platforms including, but not limited to, Google, Facebook⁹, and other digital advertising networks, thereby reaching consumers throughout the United States, including consumers who otherwise would have purchased products from Brighter Image for a realistic, but higher price.

34. Defendants have additionally used AI-generated photographs and digitally altered images with misleading before-and-after comparisons that do not accurately depict the actual appearance, quality, fit, or performance of Shiny Smile Veneers' products.

⁹ Ad Volume attached as **Exhibit "G"** is fully incorporated herein by reference as if set forth below.



These visual misrepresentations create unrealistic expectations regarding the results consumers can reasonably expect to obtain.

35. Defendants have also engaged in the practice known as unfair competition. In furtherance of said unfair competitive practices, Defendants have published and/or caused publication of purported product comparisons on websites such as Snap On Veneers Reviews and Consumer Review Guide¹⁰ and review platforms that represent themselves as independent evaluations of removable snap-on veneer providers. These comparison websites' posts are influenced, controlled, or compensated by their affiliated partnerships, such as Defendants, and are not true independent consumer review platforms.¹¹

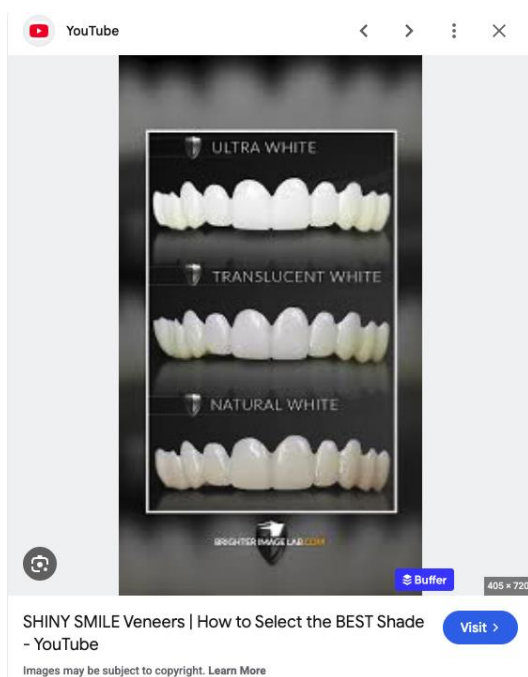
36. These comparison websites consistently rank Shiny Smile Veneers as the highest-rated snap-on veneers brand while either excluding Brighter Image entirely, assigning Brighter

¹⁰ Comparison Websites as Independent Platforms attached as **Exhibit "H"** are fully incorporated herein by reference as if set forth below.

¹¹ Comparison Website Ad Disclosures attached as **Exhibit "I"** are fully incorporated herein by reference as if set forth below.

Image artificially lower rankings, or publishing misleading or incomplete information regarding Brighter Image's products and services. Defendants have used these purportedly independent rankings to falsely suggest objective superiority over competitors and to influence consumer purchase decisions.

37. Defendants have also used Brighter Image's branded product imagery in their commercial advertising without Plaintiff's authorization. For example, Defendants displayed an image bearing Brighter Image's name and branding in a Shiny Smile Veneers YouTube marketing video.



38. By incorporating Brighter Image's branded imagery into Defendants' marketing materials, Defendants sought to capitalize on Brighter Image's reputation and goodwill while creating the false impression that Brighter Image's products, images, or brand were associated with, endorsed by, or otherwise connected to Defendants and their competing products. Defendants' use of Brighter Image's branded imagery forms part of the broader deceptive marketing campaign alleged herein.

39. As a direct and proximate result of Defendants' false advertising, deceptive marketing practices, misleading endorsements, fabricated testimonials, manipulated comparisons, and unfair competitive conduct, Brighter Image has suffered substantial economic injury.

40. To date, Brighter Image has lost significant financing-related revenue attributable to the diversion of consumers. Brighter Image continues to suffer ongoing damages, including lost revenue, lost business opportunities, and other economic harm, as Defendants continue their unlawful marketing practices.

CAUSES OF ACTION

FALSE ADVERTISING UNDER SECTION 43(a) OF THE LANHAM ACT

41. Brighter Image re-alleges and incorporates the facts and allegations set forth above as if they were fully set forth herein.

42. Section 43(a) of the Lanham Act protects those engaged in commerce from precisely this type of unfair competition and false advertising by creating a cause of action for those like Brighter Image who are harmed by it. 15 U.S.C. § 1125(a)(1). Defendants have disregarded these basic provisions of the law. Rather than invest the time and resources necessary to develop, market, and provide the product that they purport to provide their customers, Defendants are simply falsifying their credentials, marketing, customer reviews, physician recommendations, and product. Defendants also mislead doctors and the public about their business practices and products.

43. Defendants have engaged in, and continue to engage in, false advertising under Section 43(a) of the Lanham Act against Brighter Image. Shiny Smile Veneers manufactures, markets, and sells custom-made removable snap-on veneers in direct competition with Brighter Image's products in interstate commerce throughout the United States.

44. Beginning on or around September 2025, and continuing through the present, Defendants launched a pervasive advertising campaign across multiple online platforms, including, but not limited to Facebook, search engines, and Shiny Smile Veneers' official website to promote its success, safety, and physical quality of its custom-made snap-on veneers.

45. In these advertisements, Defendants routinely utilize AI to generate fictitious dental professionals, medical endorsements, and fabricated before-and-after consumer related profiles.

46. Specifically, Defendants' advertisements feature synthetic, AI-generated individuals who are explicitly identified as licensed, practicing dentists (the "Fake Dentists"). These Fake Dentists make false assertions to the consuming public, including claims that Shiny Smile Veneers' snap-on veneers are "dentist-approved," "clinically evaluated," and "safely engineered to protect natural teeth."

47. Furthermore, Defendant utilizes AI-altered imagery to display deceptive, flawless cosmetic results that do not represent actual outcomes achieved by real consumers using Shiny Smile Veneers' products.

48. Defendants' advertisements are literally false. The clinical experts endorsing the products do not exist, hold no medical licenses, and have conducted no clinical evaluations. Moreover, the structural quality and cosmetic success depicted in the AI-altered images are physically impossible to achieve via Shiny Smile Veneers' actual commercial product.

49. Alternatively, Defendants' use of AI medical professionals and manipulated imagery is materially misleading and possesses a clear tendency to deceive a substantial segment of the consuming public by manufacturing a false aura of scientific legitimacy, safety, and professional dental oversight. Defendants have violated the Lanham Act by using "false or misleading descriptions of fact" and "false or misleading representations of fact" in their

commercial advertising or promotion that misrepresent “the nature, characteristics, [or] qualities” of their business practices and their products, as set forth herein.

50. Defendants’ false and misleading statements are material to consumers’ purchasing decisions. In the dental and cosmetic appliance market, endorsements by licensed medical professionals and visual representations of final product quality are the primary drivers of consumer trust and transaction intent.

51. Defendants caused these false and misleading statements to enter into interstate commerce by targeting and broadcasting the advertisements to consumers across state lines via digital advertising networks and social media platforms.

52. Defendants engaged in the bad-faith manipulation of AI and fabrication of medical endorsements willfully, knowingly, and with the specific intent to deceive vulnerable consumers and wrongfully divert market share and sales away from Brighter Image.

53. As a direct and proximate result of Defendants’ false advertising, Brighter Image has suffered, and continues to suffer, immediate and competitive injury, including the direct diversion of sales, loss of revenue, and severe dilution of its legitimate brand goodwill. Brighter Image seeks actual damages that it has incurred because of Defendants’ unlawful and deceptive business tactics, plus attorney’s fees and court costs. *See* 15 U.S.C. § 1117(a).

54. Brighter Image further seeks disgorgement of Defendants’ profits, for which Brighter Image now sues Defendants. Brighter Image also seeks an injunction prohibiting Defendants from disseminating the false and misleading advertising described herein, including any advertising that misrepresents the existence, licensure, qualifications, and/or endorsement of any dental or medical professional, or the results achievable with Defendants’ products. *See* 15 U.S.C. § 1116(a).

FALSE ASSOCIATION AND FALSE ENDORSEMENT UNDER SECTION 43(a) OF THE LANHAM ACT

55. Brighter Image re-alleges and incorporate the facts and allegations set forth above as if they were fully set forth herein.

56. Defendants have engaged in, and continue to engage in, false association and false endorsement under Section 43(a) of the Lanham Act against Brighter Image.

57. Defendants' commercial website, advertisements, and promotional materials feature AI-generated individuals portrayed as dentists and dental professionals, together with purported endorsements, testimonials, reviews, and rankings attributed to dentists, dentals professionals, reviewers, and purported independent third-party review or ranking platforms.

58. Through these misrepresentations, Defendants falsely convey the commercial impression that Shiny Smile Veneers and its products are affiliated with, connected to, sponsored by, approved by, or endorsed by independent licensed dental professionals, reviewers, influencers, and other independent third-party platforms.

59. Upon information and belief, many of the purported dentists and dental professionals depicted in Defendants' marketing are AI-generated, fictitious, or are not identifiable licensed dental professionals. Upon information and belief, Defendants also promote purported independent reviews, endorsements, and rankings that are paid, sponsored, or otherwise compensated, while any disclosures concerning such compensation are inconspicuous or otherwise insufficient to eliminate the overall impression that such endorsements are independent and unbiased.

60. Defendants' conduct is likely to cause confusion, mistake, or deception by causing consumers to believe that the purported dentists, dental professionals, reviewers, influencers, and review or ranking platforms are independent third parties who have genuinely approved, endorsed,

sponsored, or are otherwise affiliated with Shiny Smile Veneers and its products, when no such independent endorsement, affiliation, or sponsorship exists.

61. The foregoing confusion is material because consumers purchasing cosmetic dental products reasonably rely on the existence of genuine, independent professional endorsements and unbiased third-party reviews in deciding whether to purchase such products.

62. Defendants knowingly and willfully caused these false and misleading representations concerning endorsement, affiliation, sponsorship, and approval to enter interstate commerce through their website, digital advertising, and other promotional materials with the intent to deceive consumers and to capitalize on the credibility and goodwill associated with independent dental professionals and third-party reviews.

63. As a direct and proximate result of Defendants false association and false endorsement, Brighter Image has suffered and continues to suffer injury to its business, goodwill, reputation, and competitive position including the direct diversion of sales and substantial damage to its legitimate commercial market share. Brighter Image seeks actual damages that it has incurred because of Defendants' false, deceptive, and misleading representations of professional endorsement, plus attorneys' fees and court costs. *See* 15 U.S.C. § 1117(a).

UNFAIR COMPETITION UNDER TEXAS COMMON LAW

64. Brighter Image re-alleges and incorporate the facts and allegations set forth above as if they were fully set forth herein.

65. Defendants have engaged in, and continue to engage in, unlawful business acts or practices as described herein, all in an effort to gain unfair competitive advantage over Brighter Image.

66. Defendants' conduct in the marketplace is independent of legitimate, fair competition and relies entirely on deceptive, fraudulent, and illegal practices.

67. Specifically, Defendants' unfair competition consists of continuous, predatory scheme that includes:

1. Disseminating fabricated online reviews and falsified consumer metrics;
2. Published fraudulent product comparison guides and deceptive rankings;
3. Falsely claiming dental professional licensure and medical credentials;
4. Intentionally capitalizing on Brighter Image's reputation and goodwill through its unauthorized use of Brighter Image's branding; and
5. Engaging in the unauthorized, unlicensed, practice of dentistry in violation of Texas regulatory law.

68. Defendants' actions constitute independent civil torts and violations of statutory law that interfere with Brighter Image's ability to conduct business fairly in the marketplace.

69. Defendants engaged in these deceptive and illegal acts with specific intent to deceive consumers, damage Brighter Image's business reputation, and capture market share through unlawful means.

70. As a direct and proximate result of Defendants' common law unfair competition, Brighter Image has suffered, and will continue to suffer severe competitive injury, including a direct diversion of customers, loss of prospective snap-on veneer sales, and substantial reduction in brand goodwill. Defendants should be compelled to disgorge and/or restore any and all revenues, earnings, profits, compensation, and benefits they have obtained, including but not limited to disgorging any revenues earned from their unlawful business acts or practices that interfere with Brighter Image's ability to conduct business fairly in the marketplace, and should be enjoined from further unlawful, unfair, and deceptive business practices.

BUSINESS DISPARAGEMENT UNDER TEXAS COMMON LAW

71. Brighter Image re-alleges and incorporate the facts and allegations set forth above as if they were fully set forth herein.

72. Defendants have engaged in, and continue to engage in, business disparagement against Brighter Image in violation of Texas Civil Practice & Remedies Code § 73.001.

73. Defendants published false and disparaging statements of fact concerning the commercial quality and economic interests of Brighter Image's veneer product line.

74. Specifically, Defendants created, funded, and maintained deceptive online marketing materials, simulated consumer review platforms, and fraudulent "company rankings" and "comparison guides."

75. Within these rankings and comparisons, Defendants utilized fabricated data, falsified customer metrics, and fictitious reviews to systemically misrepresent the composition, durability, and safety of Brighter Image's snap-on veneer product.

76. Defendants' published materials explicitly and falsely degraded Brighter Image's veneer product—labeling it as inferior or structurally unsound—while artificially elevating Shiny Smile Veneers' own competing product to the top of the fraudulent rankings.

77. Defendants published these false comparisons, rankings, and statements with actual malice. Defendants knew the data and metrics were entirely fabricated, or acted with reckless disregard for the truth, with the specific intent to cause economic harm to Brighter Image.

78. Defendants lacked any legal privilege, justification, or factual basis to publish these deceptive comparisons and degrading statements.

79. The publication of these false rankings and product degradations played a material and substantial part in inducing prospective consumers to not deal with Brighter Image.

80. As a direct and proximate result of Defendants' disparaging conduct, Brighter Image has suffered special damages consisting of quantifiable pecuniary loss, including a sharp and measurable decline in snap-on veneer product sales, and the direct diversion of long-term customers away from Brighter Image Lab to Shiny Smile Veneers.

TORTIOUS INTERFERENCE UNDER TEXAS COMMON LAW

81. Brighter Image re-alleges and incorporate the facts and allegations set forth above as if they were fully set forth herein.

82. Defendants have engaged in, and continue to engage in, tortious interference against Brighter Image in violation of Texas Common Law.

83. There was a reasonable probability that Brighter Image would have entered into prospective business relationships and concluded sales agreements with new retail consumers and commercial distributors for its snap-on veneer products.

84. Defendants had actual and constructive knowledge of these prospective business relationships and the ongoing consumer interest in Brighter Image's brand.

85. Defendants intentionally, willfully, and maliciously interfered with these prospective relationships through independently tortious, fraudulent, and unlawful means.

86. Specifically, Defendants knowingly created, deployed, and funded deceptive marketing materials, fraudulent product rankings, and falsified comparison guides.

87. Defendants further weaponized these deceptive materials to manipulate digital marketplaces by seizing paid-search algorithms, bidding deceptively on Brighter Image's branded search terms, and routing prospective consumer web traffic away from Brighter Image's official business listings to Defendants' fraudulent review networks.

88. Defendants engaged in this predatory conduct with specific purpose of harming Brighter Image's brand reputation, undermining its marketplace goodwill, and actively disrupting Brighter Image's prospective sales pipeline.

89. Defendants' independently tortious actions successfully prevented prospective consumers from choosing Brighter Image's snap-on veneer products, thereby diverting the paid-search traffic, review interest, and prospective revenue directly to Defendants.

90. As a direct and proximate result of Defendants intentional and tortious interference, Brighter Image has suffered actual financial harm, including lost prospective sales, diminished brand equity, and wasted digital advertising expenditures.

REQUEST FOR INJUNCTIVE RELIEF

91. Plaintiff re-alleges and incorporate the facts and allegations set forth above as if they were fully set forth herein.

92. Plaintiff seeks the issuance of a temporary restraining order and preliminary injunctive relief from the Court to preserve the status quo and preserve the parties' relative competitive positions in the market for custom-made removable snap-on veneers during the pendency of this action.

93. The Court has authority to grant the requested relief under Section 34(a) of the Lanham Act, 15 U.S.C. § 1116(a), which empowers the Court, according to the principles of equity, to enjoin violations of Section 43(a) of the Lanham Act, 15 U.S.C. § 1125(a).

94. Based upon the facts, causes of action, and evidence set forth above and in the accompanying application and supporting declaration, the Court should grant the requested injunctive relief.

95. The Court has the authority to issue injunctive relief in this situation to prevent Defendants from continuing to disseminate the false and misleading advertising described above.

96. Defendants must be restrained and enjoined from engaging in any of the following acts:

- (a) Representing, directly or by implication, that any Shiny Smile Veneers product is created, developed, designed, tested, reviewed, supervised, approved, or endorsed by any licensed dentist or other licensed dental or medical professional, unless the representation is truthful and the identified professional in fact holds a current, valid license and provided the represented review or endorsement;
- (b) Using in any advertisement or promotional material any artificial-intelligence-generated, computer-generated, synthetic, or otherwise fictitious person depicted as a dentist, dental professional, physician, or other health-care provider endorsing, approving, or vouching for Shiny Smile Veneers or its products;
- (c) Representing that “Dr. Henry Dean,” or any similarly named or depicted individual, is a “Top-Rated Dentist,” founder, operator, or endorser of Shiny Smile Veneers, unless that individual is a real, identifiable person who holds a current, valid dental license and the representations concerning that individual are truthful and substantiated;
- (d) Using or publishing customer testimonials, reviews, or endorsements that portray fictitious, computer-generated, or AI-generated individuals as actual users of Shiny Smile Veneers’ products, or that attribute to any person a product experience that did not occur;
- (e) Representing that Shiny Smile Veneers’ products provide any medical or therapeutic benefit—including relief from jaw pain or tooth pain, or improvement of oral health—

unless Defendants possess competent and reliable scientific evidence substantiating each such claim at the time it is made;

- (f) Using AI-altered, digitally manipulated, or otherwise non-representative images, including “before-and-after” comparisons that do not accurately depict results actually and typically achievable with the product as commercially sold;
- (g) Publishing, funding, operating, or causing the publication of any product-comparison website, ranking, or review platform that is represented as independent while in fact being owned, controlled, sponsored, or compensated by Defendants, without clear and conspicuous disclosure of Defendants’ material connection to it; and
- (h) Publishing any false or misleading statement disparaging Plaintiff or Plaintiff’s products, including fabricated data, metrics, rankings, or reviews.

97. In addition, and pursuant to 15 U.S.C. § 1116(a) and the principles of equity, Plaintiff requests that the Court order Defendants to: (i) within ten (10) days of entry of the order, remove and cease dissemination of the specific advertisements, videos, images, testimonials, and comparison or review websites containing the representations described above; and (ii) within thirty (30) days after service of the injunction, file with the Court and serve on Plaintiff a report in writing under oath setting forth in detail the manner and form in which Defendants have complied with the injunction.

98. Plaintiff has a likelihood of success on the merits of the causes of action asserted above and based upon the allegations contained within this complaint.

99. Plaintiff is without an adequate remedy at law because the continued dissemination of Defendants’ false and misleading advertising is likely to render any eventual award of monetary

damages an inadequate and incomplete remedy, given the difficulty of quantifying lost sales, diverted customers, and injury to goodwill.

100. Plaintiff will suffer immediate and irreparable harm if Defendants are not enjoined from continuing to disseminate the false and misleading advertising described above.

101. No harm will be suffered by Defendants from the issuance of a temporary restraining order or preliminary injunctive relief to freeze and preserve the status quo because Defendants have no legitimate interest in continuing to publish advertising that is false or misleading. Greater harm will be suffered by Plaintiff if the requested injunctive relief is not granted. Granting the requested injunctive relief is in the public's interest because the public has a substantial interest in truthful, non-deceptive advertising, particularly for products marketed with claims of professional dental endorsement and health-related benefits, and such conduct should properly be prohibited.

102. Plaintiff respectfully requests that the Court require only a nominal bond or such other security as the Court deems just and appropriate under the circumstances.

103. For the reasons cited in this Complaint and Application for Temporary and Injunctive Relief, Plaintiff requests the Court to issue a temporary restraining order; after notice and a hearing, a preliminary injunction; and, upon final trial, a permanent injunction, each enjoining the acts described above pursuant to 15 U.S.C. § 1116(a).

ATTORNEYS' FEES

104. Plaintiff re-alleges and incorporate the facts and allegations set forth above as if they were fully set forth herein.

105. Pursuant to 15 U.S.C. § 1117(a), Plaintiff respectfully requests an award of its reasonable attorneys' fees and costs incurred in prosecuting this action. This is an "exceptional" case within the meaning of § 1117(a) because Defendants actions were willful, egregious, and

unsupported by any colorable defense. In light of the totality of the circumstances, including the strength of Plaintiff's rights, the clear evidence of Defendants false, deceptive, and misleading representations, and the need to deter similar misconduct, Plaintiff asks that the Court find this matter exceptional and award Plaintiff its reasonable attorneys' fees and costs in an amount to be determined upon submission of appropriate billing records and a supporting fee application, together with such further relief as the Court deems just and proper.

NO WAIVER

106. By filing this lawsuit, Plaintiff does not waive or release any rights, claims, causes of action, or defenses or make any election of remedies that it has, but expressly reserves such rights, claims, causes of action and defenses.

CONDITIONS PRECEDENT

107. All conditions precedent to the Plaintiff's right to recovery have been performed, have occurred, and/or have been waived.

PRAYER

WHEREFORE, PREMISES CONSIDERED, Plaintiff Brighter Image Lab, Inc. requests that Defendants Shiny Smile Veneers, LLC and The GiddyUp Group, Inc. be cited to appear and answer, and that on final trial, Plaintiff has judgment against Defendants as follows:

1. Judgment in favor of Plaintiff on all claims asserted herein;
2. An award of all actual, compensatory, consequential, and economic damages sustained by Plaintiff as a result of Defendant's unlawful conduct pursuant to 15 U.S.C. § 1117(a), including, but not limited to, lost profits, lost goodwill, business injury, and the costs of retrospective corrective advertising, in an amount to be determined at trial;
3. An accounting and disgorgement of all revenues, profits, gains, and other benefits wrongfully obtained by Defendants as a result of the unlawful conduct alleged herein, pursuant to 15 U.S.C. § 1117(a);

4. Treble damages, enhanced damages, or monetary relief to the fullest extent authorized by applicable federal and state law;

5. Preliminary and permanent injunctive relief pursuant to 15 U.S.C. § 1116(a), enjoining Defendants from continuing the unlawful conduct alleged herein, including the dissemination of false or misleading advertisements, fictitious endorsements, fabricated professional credentials, deceptive comparison advertising, and other misleading commercial representations;

6. Plaintiff's reasonable attorneys' fees, taxable costs, litigation expenses, and pre- and post-judgment interest, to the extent permitted by law; and,

7. That the Court grant such other, further, and different relief as the court deems proper under the circumstances.

Dated: July 21, 2026.

Respectfully submitted,

FRIEDMAN & FEIGER, L.L.P.

/s/ Jason H. Friedman

By: _____

Jason H. Friedman

State Bar No. 24059784

jason@fflawoffice.com

Paige A. Hawkins

State Bar No. 24130788

phawkins@fflawoffice.com

17304 Preston Road, Suite 300

Dallas, Texas 75252

(972) 788-1400 (Telephone)

ATTORNEYS FOR PLAINTIFF

EXHIBIT “A”



That's When I Heard About Dr. Dean, A Top Cosmetic Dentist With A Fascinating Story...

Dr. Dean spent **more than a decade** perfecting smiles with veneers, crowns, braces, and implants.

But when **his own mother** wanted veneers, he realized that he didn't want to **drill her healthy teeth down to stubs** and charge her over \$10,000.

That's when he started dreaming up a solution that would help people cover up **more serious cosmetic flaws like damaged teeth** - not just whiten them - without the invasive dental work and expense that come with veneers.

He put it like this...



Dr. Henry Dean | *Cosmetic Dentist*

[//www.shinysmileveneers.com/reviewer/dr-sara/](https://www.shinysmileveneers.com/reviewer/dr-sara/)

Author



Dr Sara

Dedicated Dentist

Medically Reviewed

Dr Sara is a dedicated dentist with 10 years experience, who makes every effort to stay on top of current developments in dentistry. Dr Sara's scope of dental expertise is in both general and cosmetic dentistry.

She specializes in crown and bridge replacements, endodontic treatment, implant guided surgeries and more. She has provided her patients with full mouth reconstruction using computer-aided surgical guides to improve their oral health, function and smile.

Bachelor's Degree in Oral and Dental Surgery (BDS)

Membership of the Joint Dental Faculties at The Royal College of Surgeons of England

8:21
They are **comfy**, stay in place when you **talk or eat**, but you can also **take them off easily**. This keeps your **real teeth safe and healthy** while making your **smile look great**.

Why Dentists Like It Too



Some dentists usually suggest **expensive treatments**, but many are now saying this is a **good choice** because it's **more affordable**. Dr. Martinez, a **dentist for 15 years**, says,

*"Not everyone can pay **\$20,000** for regular veneers. This is a **cheaper option** I recommend. It helps people have more choices and not spend too much."*

Different dentists have different opinions. Some still prefer the **old, pricey ways**, while others, like Dr. Martinez, think it's important to offer treatments that are **easier for everyone to get**. "In the end," he says, "it's about **making people happy** with their **smiles** in a way they can **afford**."



EXHIBIT “B”



Texas State Board of Dental Examiners

License Lookup

Dentists Dental Assistants Hygienists Labs / Mobile Facilities Exception Tracking Numbers [Info](#) [Reset/Clear](#)

License Number	License Status Info	Disciplinary Actions	Remedial Plans	First Name	Middle Name/Initial	Last Name	City, State
Refine Results	Show All	Show All	Show All	Shams	Refine Results	Dean	Refine Results
No matching records found							
License Number	License Status	Disciplinary Actions	Remedial Plans	First Name	Middle Name/Initial	Last Name	City, State

Showing 0 to 0 of 0 entries (filtered from 40,457 total entries)



Texas State Board of Dental Examiners

License Lookup

Dentists Dental Assistants Hygienists Labs / Mobile Facilities Exception Tracking Numbers [Info](#) [Reset/Clear](#)

License Number	License Status Info	Disciplinary Actions	Remedial Plans	First Name	Middle Name/Initial	Last Name	City, State
Refine Results	Show All	Show All	Show All	Mohamed	Refine Results	Shamseldin	Refine Results
No matching records found							
License Number	License Status	Disciplinary Actions	Remedial Plans	First Name	Middle Name/Initial	Last Name	City, State

Showing 0 to 0 of 0 entries (filtered from 40,457 total entries)

Department of Health | [FLHealthSource.gov](#) | [Public Data Portal](#) | [New Licensed Health Care Practitioners](#) | [Search Home](#) | [Search Help](#)

License Verification

Complete one or more search fields.
[Click Power Fields to produce more results. See Search Help.](#)

Board/Council	-- Any --
Profession	No records found
License Number	No records found. Please try your search again with other search values.
Business Name	To verify a Nurse Licensure Compact Multi-State RN or LPN License, access NURSUS . To verify authorizations under the Psychology Interjurisdictional Compact, access PSYPACT .
Last Name	Shams
First Name	Shams El
City	
County	-- Any --
Zip Code	
License Status	All statuses

[Search](#) [Reset](#)

Department of Health | FLHealthSource.gov | Public Data Portal | New Licensed Health Care Practitioners | Search Home

License Verification

Complete one or more search fields. State search fields to produce more results. [View Search Help](#)

Board/County: --Any--

Profession: No records found

License Number: No records found. Please try your search again with other search values.

Business Name: To verify a Nurse Licensure Compact Multi-State RN or LPN License, access [NURSUS](#). To verify authorizations under the Psychology Interjurisdictional Compact, access [PSYPACT](#).

Last Name: Shamseldin

First Name: Mohamed

City:

County: --Any--

Zip Code:

License Status: All statuses

Search Reset

9:19

Teams

Search



Mohamed Shamseldin · 2nd
CEO & Entrepreneur
Shiny Smile Veneers
Richardson, Texas, United States · 487 connections

Connect Message

Activity
498 followers

 **5 Years of Success ... in the US InTheKloud-USA is proud to announce that we have reached a...**
Mohamed Shamseldin liked this

[See all](#)

Experience

 **General Manager**
Shiny Smile Veneers
Jan 2019 - Present · 7 yrs 4 mos
Dallas, Texas, United States

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[Hire talent free](#)

Mohamed Shamseldin
CEO & Entrepreneur

[Connect](#)

[Message](#)

All activity

Posts **Reactions**

Mohamed Shamseldin • 3rd+
CEO & Entrepreneur
1yr •

I'm happy to share that I'm starting a new position as General Manager at Lumi Visage LLC!

Starting a New Position

6 reactions 2 comments

[Like](#) [Comment](#) [Repost](#) [Send](#)

Mohamed Shamseldin • 3rd+
CEO & Entrepreneur
12yr •

Dr Moahmed Shams , 11341 Heliopolis
checkdent.com

1 reaction

[Like](#) [Comment](#) [Repost](#) [Send](#)

Ad

You've seen the talent. Why wait to hire?

Connect with your top pick on Upwork today.

[Get Started](#)

People you may know

Miki Ellisor
Licensed Esthetician at Aveda

[Connect](#)

Muhammad Adel
General Dentist at smilink

[Connect](#)

Georgina Arellano
Dental Hygiene Student

[Connect](#)

Mona Elattar
General Dentist at Free

[Connect](#)

Breanna English
Medical Assistant at Nextlevel Urgent Care

[Connect](#)

[Show more](#)

Texas State Board of Dental Examiners

License Lookup

[Dentists](#)
[Dental Assistants](#)
[Hygienists](#)
[Labs / Mobile Facilities](#)
[Exception Tracking Numbers](#)

[Reset/Clear](#)

License Number	License Status info	Disciplinary Actions	Remedial Plans	First Name	Middle Name/Initial	Last Name	City, State
Refine Results	Show All	Show All	Show All	Henry	Refine Results	Dean	Refine Results
No matching records found							
License Number	License Status	Disciplinary Actions	Remedial Plans	First Name	Middle Name/Initial	Last Name	City, State

Showing 0 to 0 of 0 entries (filtered from 40,447 total entries)

License Verification

HENRY L DEAN

License Number: ME4558

Data As Of 7/14/2026

- License Information
- Secondary Locations
- Discipline/Admin Action
- Practitioner Profile

Profession	Medical Doctor
License	ME4558
License Status	Null And Void/
License Expiration Date	12/31/1987
License Original Issue Date	12/31/1973
Address of Record	If further information is needed, please contact the Department of Health at (850) 488-0595.
Controlled Substance Prescriber (for the Treatment of Chronic Non-malignant Pain)	No
Discipline on File	No
Public Complaint	No

Back

For instructions on how to request a license certification of your Florida license to be sent to another state from the Florida Department of Health, please visit the License Certifications web page.



https://services.rcsed.ac.uk/membership-information/member-search

0 Results

Title	Name	Country
Last Name Shamma First Name Sara		

EXHIBIT “C”

The screenshot shows a web browser window with the URL `topreviewed.org/compare/p/znap-on-veneers-3?utm_source=google&utm_medium=cpc&utm_id=23295936873&utm_content=196503381824&utm_term=best%20snap%20on%20veneers&creativeid=788963601189&adgro...`. The page has a dark blue background with the headline "Ready for Your Perfect Smile?" in white. Below the headline is an orange button that says "GET YOUR CUSTOM SMILE -- 40% OFF TODAY →". Underneath the button, in smaller white text, it says "60-day money-back guarantee • Free remakes • 3-year warranty". Further down, it says "Join 100,000+ happy customers" in green. Below this is a profile for Sarah Mitchell, RDH, a Registered Dental Hygienist & Consumer Dental Analyst. Her profile includes a circular photo of her, a 5-star expert rating, and a bio stating she has 12 years of experience in cosmetic dentistry across California. The footer of the page features the TopReviewed.org logo, a navigation menu with links to Home, About us, Contact us, Privacy Policy, and Terms of Use, an "ADVERTISING DISCLOSURE" section with fine print, and a "DMCA PROTECTED" logo.

Ready for Your Perfect Smile?

GET YOUR CUSTOM SMILE -- 40% OFF TODAY →

60-day money-back guarantee • Free remakes • 3-year warranty

Join 100,000+ happy customers

REGISTERED DENTAL HYGIENIST & CONSUMER DENTAL ANALYST
Sarah Mitchell, RDH
★★★★★ Expert rating

Sarah spent 12 years as a dental hygienist in cosmetic practices across California, assisting with thousands of veneer fittings and smile consultations. She joined TopReviewed to bring clinical expertise to product testing—evaluating fit, materials, and real-world durability that most review sites overlook.

TopReviewed.org
Independent guidance backed by rigorous research so you can compare with confidence.

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ADVERTISING DISCLOSURE
TopReviewed.org is your free online resource for confident decision-making across various products and services. We accept advertising compensation from featured companies, which may influence brand placement, order, and assigned scores. Company listings do not imply endorsement, and we don't include all market providers. While our meticulously researched content aims to be helpful, details like prices and offers are dynamic, supplied by partners, and subject to change without notice. This information does not constitute professional advice. All representations and warranties regarding content are disclaimed, except as noted in our Terms of Use. Reproduction in whole or in part is strictly prohibited.

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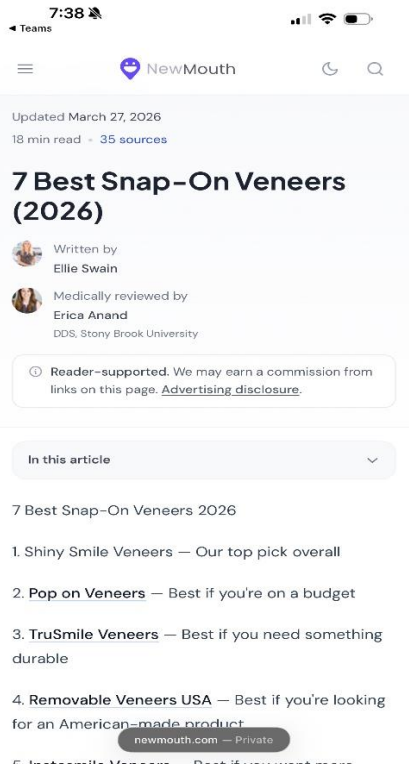


EXHIBIT “D”

https://search.dca.ca.gov/results



BOARD

LICENSE TYPE

Registered Dent

LICENSE NUMBER

Search

BUSINESS NAME

Business

FIRST NAME

Sarah

LAST NAME

Mitchell



0 RESULTS (SHOWING 0)

SEARCH FILTERS

NO RESULTS MATCHED YOUR SEARCH CRITERIA.

BOARD/BUREAU (+ MORE) (CLEAR)

ADA Find-a-Dentist®

Go to MouthHealthy

ADA Seal of Acceptance

 Filters

 Erica Anand  



Dentist not found

Looking for something specific? Use one of our filters to narrow down your search.

EXHIBIT “E”

ONTARIO SOCIETY HEALTH & FITNESS

About Us

Our Past

The Ontario Society for Health and Fitness (“OSHF”; “the Society”) is a not-for-profit organization founded in 2007 to address the needs of Ontario’s rapidly growing fitness industry. In tandem with the Canadian Society for Exercise Physiology (CSEP), OSHF worked to promote the value of physical activity and the role of exercise professionals in improving population health. By 2013, OSHF had grown to certify and serve more than two thousand CSEP Certified Personal Trainers and Exercise Physiologists, and was becoming a recognized source of support for related industry practitioners.

Our Present

OSHF Mission

To advance quality health- and performance-related physical fitness practices.

UNCATEGORIZED

OSHF Consumer Report: Best Snap-On Veneer of 2026

Presented by the Dental Asso & Ontario Society for Health & Fitness (OSHF) Executive Summary After 6 months of independent testing with dental professionals and everyday users, OSHF evaluated 12 leading snap-on veneer brands for safety, comfort, aesthetics, and durability. Our top picks balance affordability with clinical-grade quality, while cautioning against “too-good-to-be-true” options that may harm oral health. => Recommended for Best durability : Shiny Smile Veneers (See Holiday Deals) Testing Methodology Top 3 Rated Snap-On Veneers 1. Shiny Smile Veneers Snap-On Veneers (Best Overall) ✅ Pros: ⚠️ Cons: OSHF Verdict: “The gold standard for non-permanent veneers—worth the investment if budget allows.” 2. TruSmile Clip-On Veneers (Best Budget) ✅ Pros: ⚠️ Cons: OSHF Verdict: “A solid entry-level...

[READ MORE](#)



0 Comments

About the Organizations

Oral Health and Smile Foundation (OSHF)

Founded in 2010, OSHF is a non-profit research organization focused on evidence-based evaluation of dental products and procedures. Funded through academic grants and institutional partnerships.

Shiny Smile Technologies

A dental innovation company established in 2021 specializing in removable cosmetic solutions. All products developed in collaboration with prosthodontic specialists.

Press Inquiries

ShinySmile
OSHF
info [at] oshf.ca

How does OSHF's evaluation differ from standard product reviews?

A: OSHF conducts independent clinical trials rather than relying on manufacturer data or consumer testimonials. Their 14-month study included controlled laboratory testing and supervised clinical observations.

Consumer Report's Oral and Senior Health Foundation (OSHF) shares its 2026 evaluation of the best pop-on veneers, analyzing real-world performance from users

LA, CA, UNITED STATES, December 31, 2025 /EINPresswire.com/ — OSHF's Pop-On Veneers consumers report shares the best brands that includes both positive results and critical pop-on veneers bad reviews of the top Pop-On Veneers that be used while eating food. This pop-on veneers reviews is analyzed from over 1,500 people with successful Before & After transformations. Our OSHF research participants have used pop-on veneers for testing then combined this data after 250 hours of testing each pop-on veneer for durability while eating food, usage performance, and price-point to determine the best brand of pop up veneers.

About Consumer Report's OSHF: The independent research foundation specializes in evaluating health products for aging populations, maintaining strict non-commercial policies. All tested products are purchased at retail prices, and the organization accepts no manufacturer funding.

Oshf
[email us here](#)
Amy Will

EXHIBIT “F”

2026 Market Trends & Key Statistics

The U.S. pop-on veneer market has grown to \$850 million, reflecting a 32% increase from 2025 (Statista, 2026).

78% of users cite cost savings over traditional veneers (\$15,000–\$50,000) as their primary motivation (OSHF Survey, 2026).

Durability concerns persist, with 41% of budget brands failing within six months of regular use (Dental Materials Journal, 2026).

Dr. Elena Martinez, DDS, prosthodontist at UCLA, advises: "Pop-on veneers provide a non-invasive alternative, but improper fit can cause gum irritation or bite issues. Consumers should prioritize medically tested brands."

2026 Category Leaders: Performance & Value

OSHF's Gold Standard Testing evaluated durability, comfort, and aesthetics across 15 leading brands. Best Overall (Durability): Shiny Smile Veneers

96% satisfaction rate (0% verified complaints)

Dental-grade resin construction

Most Affordable: SmileBright Direct

Patented 3D color-matching technology

89% aesthetic improvement rating

Most Reported Issues: QuickSmile Pro

33% fit-related complaints (OSHF-verified)



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Dentistry

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Pediatric Dentistry

Periodontics

Prosthodontics

Public and Population Health

Restorative Dentistry

Special Patient Care and Maxillofacial Prosthetics

+



Full-time Faculty:

- [Dr. Sieu Yien \(Ashley\) Chiam](#), Clinical Assistant Professor
- [Dr. Denny S. Chao](#), Associate Clinical Professor
- [Dr. Takahiro Ogawa](#), Professor
- [Dr. Kumar Shah](#), Clinical Professor

Part-time Faculty:

Dr. Joshua Ayoub, Dr. Andre Cataluna, Dr. Heather Chiurazzi, Dr. Min Chung, Dr. Robert Duell, Dr. Mike Hamada, Dr. Michelle Jang, Dr. Jane Kwon, Dr. Jenny Le, Dr. Bradley Matthew, Dr. Mary Lou Murtha, Dr. Daniella Orellana, Dr. Khoi Phan, Dr. Rodney Raanan, Dr. Helene Shen, Dr. John Snowden, Dr. John Song, Dr. Stella Stavrou, Dr. Dave Tajima, Dr. Alejandro Urdaneta, Dr. Xuan Yue

Teaching:

The Section of Prosthodontics offers multi-leveled educational programs, ranging from teaching students, residents, postdoctoral fellows, to clinical trainees.

- Predoctoral Program — This includes courses on Critical Thinking and Lifelong Learning (year 1), Complete Dentures (year 2), Implant Dentistry and Advanced Prosthodontics (year 3), Removable Partial Dentures (year 3), Immediate Dentures (year 3), Advanced Removable Prosthodontics (year 3), Head & Neck Cancer & Maxillofacial Prosthodontics (year 4), and Oral Health Car for Active, Older Adults (year 4).

Frequent slippage during meals

User Experience: Successes & Challenges

87% of users reported enhanced confidence (verified before/after photos).

65% required an adjustment period (common in negative reviews).

72% could eat comfortably, though 35% of budget brands experienced slippage.

Expert Insight: "High-quality pop-on veneers use BPA-free, dental-grade resin—not cheap plastics. Always verify certifications." — Dr. Raj Patel, American Dental Association Advisor

<https://www.ada.org/resources/careers/licensure>

The 3 requirements for licensure

In the U.S., licensure requirements are set by the state board of dentistry, also known as the board of dental examiners or licensing board.

Although licensure requirements vary by state and territory, all licensure candidates must meet three basic requirements: educational requirement, written examination, and clinical assessment.

Educational requirement

Nearly all states require a D.D.S. or D.M.D. degree from a university-based dental education program accredited by the [Commission on Dental Accreditation \(CODA\)](#).

Written assessment. All U.S. licensing jurisdictions require applicants to pass the Integrated National Board Dental Examination (INBDE). The INBDE, developed in response to changes in educational curricula and instructional methods, was launched in August 2020 and replaced the NBDE Part I and Part II. [Learn more about the INBDE.](#)

Clinical assessment

Applicants for dental licensure in most U.S. licensing jurisdictions are subject to a clinical assessment. Most state boards of dentistry rely on third-party testing agencies to administer a clinical assessment and acceptance varies by state and territory. View [clinical assessments accepted by each state and territory.](#)

ADA Find-a-Dentist®

Go to MouthHealthy

ADA Seal of Acceptance

 Filters

 Dr. Raj Patel

×





Dentist not found

Looking for something specific? Use one of our filters to narrow down your search.

"This wasn't a quick evaluation," explained Dr. Lisa Monroe, OSHF's Director of Clinical Research. "We subjected these products to the same level of scrutiny we apply to permanent dental solutions. ShinySmile consistently met or exceeded our benchmarks for safety, durability, and aesthetic quality."



Texas State Board of Dental Examiners

License Lookup

Dentists	Dental Assistants	Hygienists	Labs / Mobile Facilities	Exception Tracking Numbers Info	Reset/Clear	Enter Search Criteria
----------	-------------------	------------	--------------------------	--	-------------	-----------------------

License Number	License Status Info	Disciplinary Actions	Remedial Plans	First Name	Middle Name/Initial	Last Name	City, State
Refine Results	Show All ▼	Show All ▼	Show All ▼	Lisa	Refine Results	monroe	Refine Results
No matching records found							
License Number	License Status	Disciplinary Actions	Remedial Plans	First Name	Middle Name/Initial	Last Name	City, State

Showing 0 to 0 of 0 entries (filtered from 40,457 total entries)



Texas Medical Board

STATE BOARD OF ALPHABETICALLY ORDERED
HEALTHCARE PROVIDER SEARCH RESULTS

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No Results Found

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Please contact the TMB Call Center at (512) 305-7030 for assistance.

ADA Find-a-Dentist®

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ADA Seal of Acceptance

Dentist not found

Looking for something specific? Use one of our filters to narrow down your search.

EXHIBIT “G”

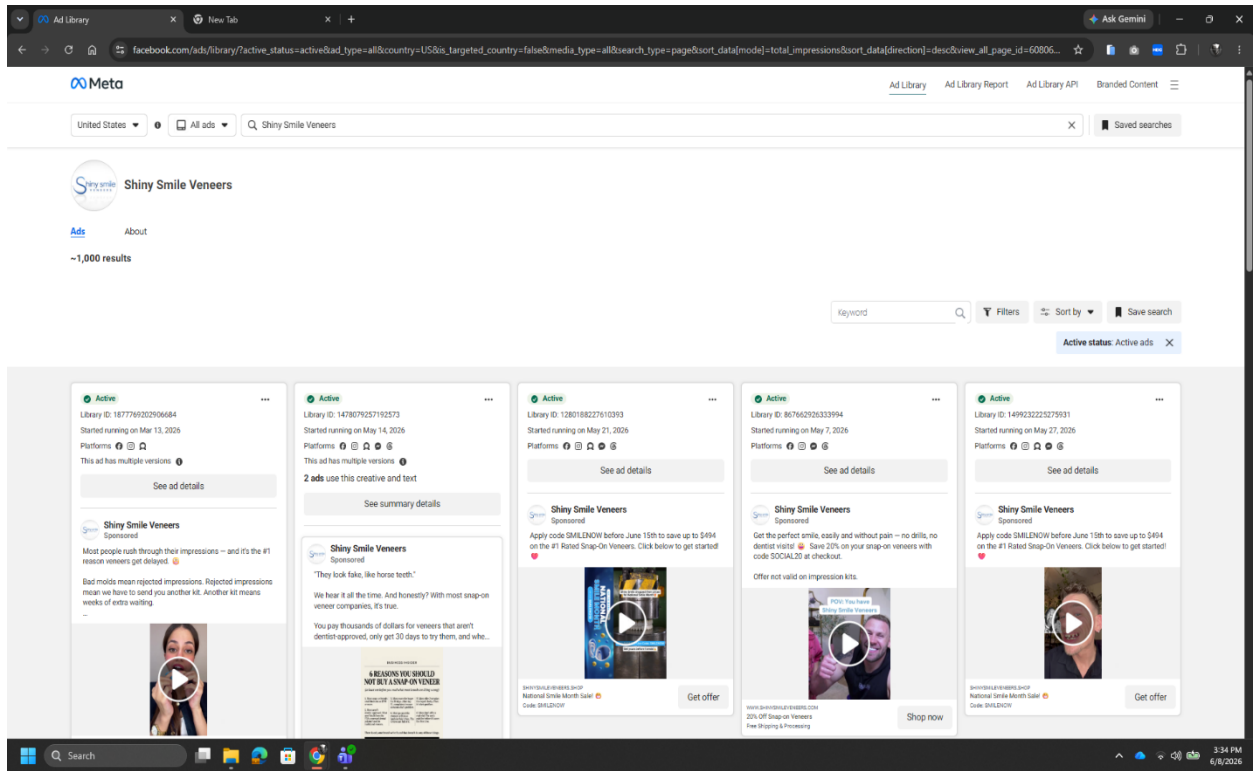
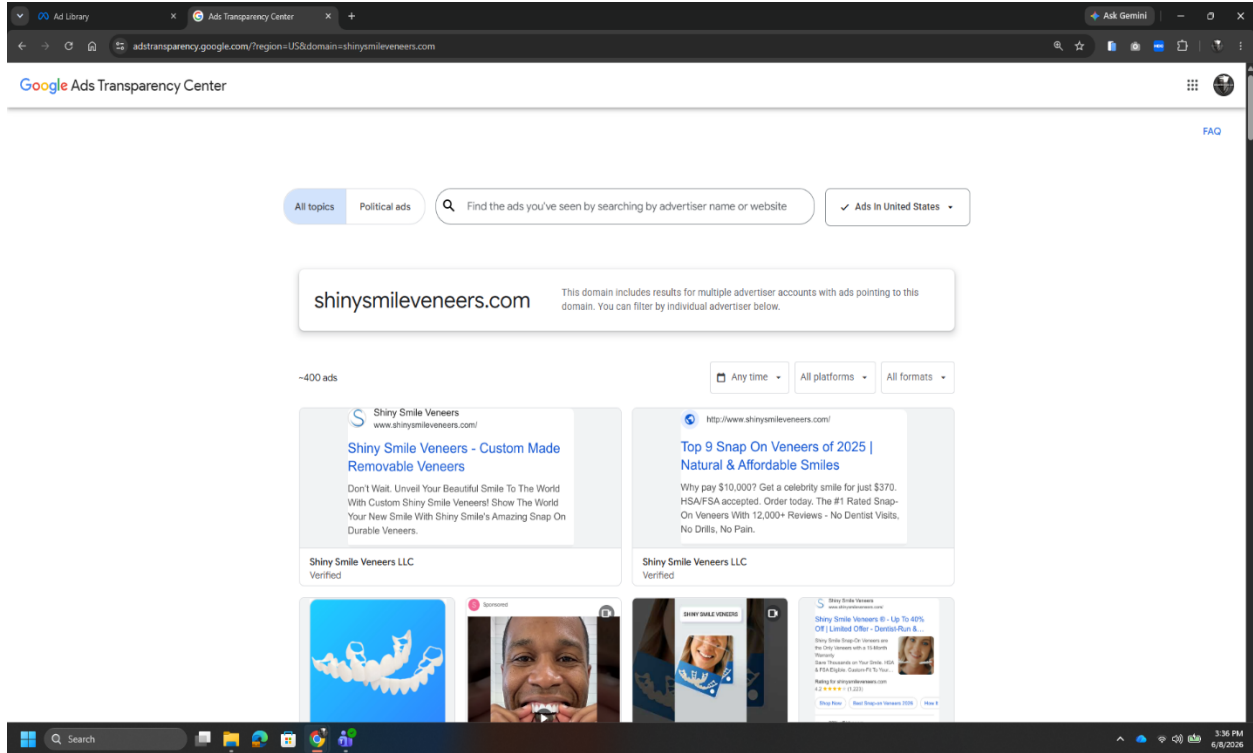


EXHIBIT “H”

← → ↻ 🏠 🌐 consumersreviewguide.com/best-snap-on-veneers/index.html ☆ 📱 📧 📄 📌 📎 📏

#1 Best Rated Snap On Veneers

#1 BEST IN 2026



Shiny Smile Veneers

A smile that looks genuine, with natural tones and a translucency that shines in any lighting.

✓

Fit & Comfort: Low-profile design with smooth edges for easy speech and a secure hold.

✓

Long-lasting: Strong build with a stain-resistant finish for daily use

✓

Daily use: Comfortable enough for regular wear, even while eating light foods.

✓

Quick process: Approximately 2 weeks from impression approval.

✓

Easy instructions: Step-by-step support helps get impressions right the first time.

✓

Free remake coverage: Enjoy as many as 3 complimentary remakes.

✓

Payment options: Split into installments to reduce upfront cost.

✓

High Demand: Frequently Sells Out

✗

“EXCEPTIONAL”

9.9

★★★★★

User Ratings (16,152+)

VISIT SITE

Special Offer: Save 40% OFF + FREE Shipping!

Read Full Review

#2



Pop On Veneers

Affordable path: Wide range of installment options available.

✓

Fit coverage: Up to two complimentary remakes Simple start:

✓

Online tools: Easy forms make remake requests simple.

✓

Beginner option: Simple, practical, and easy to start with.

✓

Warranty length: 30 days, less than #1 option.

✗

“EXCELLENT”

8.7

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Written By [Ashley Miltonimage.](#)

Dr. Ashley Rodhes has over 12 years of hands-on experience evaluating removable snap-on veneers from leading brands. Her reviews focus on what truly matters—impression accuracy, CAD/CAM fit precision, durability, stain resistance, natural shade realism and translucency, edge finishing, retention strength, and speech comfort.

She also closely assesses care instructions, warranty and remake policies, and production turnaround times. By combining controlled lab testing with real-world wear, Dr. Rodhes turns complex technical details into clear, practical insights—helping readers confidently choose veneers that look natural, fit securely, feel comfortable, and hold up to everyday life.

Consumer's Review Guide ★★★★★

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Complaint and Application for Temporary and Permanent Injunctive Relief

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snaponveneersreviews.com

Top 5 Custom Snap-On Veneers for Instant Makeovers in 2026

I Tested Them Side-by-Side & 1 Was Clearly Better

Reviewed by **Emma Levine** · Cosmetic Dental Analyst ★★★★★

✓ Tested & Approved | Verified Customer Reviews | Last Updated: May 27, 2026

[Advertiser disclosure](#) [About our rankings](#)

I personally tested 12 of the most popular snap-on veneers this year, and let's be honest! Most are useless plastic 'costume' teeth-but one professional-grade lab delivered a \$15,000 smile for under \$500.

I almost dropped serious money on the '**big-name**' brands you see all over TikTok and Instagram. But then I did what most people don't: I **read the fine print**. I found mandatory remake fees if your first impression isn't perfect, **zero long-term warranties**, and 'proprietary' cleaning kits that lock you into a subscription. In a market where a custom set costs **\$300 to \$600**, those hidden costs are a slap in the face.

I wasn't looking for a costume or a financial trap. I needed a professional, dental-grade fit that looked real at a **brightly lit restaurant table**. Not bulky 'horse teeth' that ruin your speech.

Below, I've ranked the **5 best Custom Snap-On Veneers for Instant Smile Makeovers in 2026**, ranked by price-to-performance. If you want a 'Middle Ground' solution, a flawless smile without the \$15,000 dentist bill or the \$100 'remake fee' traps, only one brand delivered professional results under the 'Restaurant Table' test.

Here is how the top 5 actually compare when you look past the marketing.

snaponveneersreviews.com

#1 **Shiny Smile Veneers** 9.7/10 ★ Best Overall of 2026 [VISIT SITE](#)

#1 Shiny Smile Veneers BEST OVERALL OF 2026



[Read Full Review](#)

PROS	CONS
✓ Natural Aesthetic blends perfectly in any lighting	✗ Not available in local retail stores
✓ Custom Fit ensures clear speech and total comfort	
✓ 3-Year Warranty & three free remakes	
✓ Low Profile for everyday wear and sensible eating	
✓ Flexible Payments ease the upfront cost	
✓ Patented "Snap In" fit technology	
✓ Built using FDA-approved materials for oral safety	

9.7

★★★★★

OUR SCORE

98% Satisfaction Rate
4,192 Customer Reviews by Verified Buyers

LIMITED TIME DEAL - 40% OFF

[VISIT SITE](#)

3,104 People Bought It This Week

Realism	98
Comfort	96
Durability	97
Value	95

#2 Pop On Veneers BEST FOR OCCASIONAL WEAR



PROS	CONS
✓ Broad installment options	✗ Users must avoid hard, sticky, or very hot items

8.9

★★★★★

#1

**Shiny Smile Veneers**
9.7/10 ★ Best Overall of 2026

VISIT SITE



Emma Levine
Cosmetic Dental Analyst
★★★★★
Emma Levine is a Cosmetic Dental Analyst who has spent the last decade evaluating at-home dental solutions. She focuses on finding products that offer **true daily wearability** without the massive markup of traditional dental offices. Her reviews prioritize **long-term durability** over flashy marketing.

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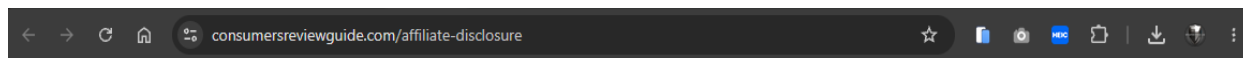
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EXHIBIT “I”



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<https://www.snaponveneersreviews.com>

A screenshot of the website snaponveneersreviews.com. The page features a dark-themed article titled "Top 5 Custom Snap-On Veneers for Instant Makeovers in 2026". Below the title, it says "I Tested Them Side-by-Side & 1 Was Clearly Better" and "Reviewed by Emma Levine - Cosmetic Dental Analyst ★★★★★". An "Advertiser disclosure" pop-up is overlaid on the article, stating: "snaponveneersreviews.com is an independent, advertising-supported comparison website. Products and services that appear on snaponveneersreviews.com are from companies from which snaponveneersreviews.com receives compensation. This compensation may impact the location and order in which these products appear. snaponveneersreviews.com takes into consideration a number of proprietary rules to determine how and where products appear on the site. snaponveneersreviews.com does not include the entire universe of available product choices." The background text of the article is partially visible, mentioning "I personally tested 12 of the most professional-grade lab delivered", "I almost dropped serious money", "read the fine print. I found mand", "kits that lock you into a subscript", "I wasn't looking for a costume or", "Not bulky 'horse teeth' that ruin your speech.", "Below, I've ranked the 5 best Custom Snap-On Veneers for Instant Smiles Makeovers in 2026, ranked by price to performance. If you want a", "stic 'costume' teeth-but one", "did what most people don't: I", "nties, and 'proprietary' cleaning", "are a slap in the face.", and "brightly lit restaurant table."

VERIFICATION

I, Bill Watson, declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that:

1. I am the Plaintiff in the above-captioned action. I am over the age of eighteen, am competent to make this Verification, and have personal knowledge of the facts stated herein, except as to those matters stated upon information and belief.
2. I have read the foregoing Complaint and am familiar with its contents.
3. The factual allegations contained in the Complaint are true and correct based upon my personal knowledge, except for those allegations expressly stated to be based upon information and belief, and as to those allegations, I believe them to be true and correct.
4. I make this Verification in support of the Complaint and Plaintiff's request for temporary, preliminary, and permanent injunctive relief.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this ____ day of _____, **2026**, at _____.

Bill Watson