

## **PRESS RELEASE**

### **Contact:**

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### **TIM BALLARD'S VICTIMS FILE LAWSUIT**

Today, five women filed a lawsuit in the Third Judicial District Court of Utah against Tim Ballard, O.U.R., Ballard's and O.U.R.'s affiliated companies, and the Board of O.U.R. The complaint accompanies this Press Release.

Each of the five women provided their own statement that sets forth in painful detail how Tim Ballard manipulated and sexually assaulted them, under the guise of fighting childhood trafficking. The women have used pseudonyms in an effort to protect them from the zealous defenders of Ballard and his organizations.

Some of these women reported their stories to O.U.R. and were ignored and silenced. As a result, Tim Ballard was not exposed by O.U.R. for what he truly is— a sexual predator. These five brave women have come forward now because they want the world to know the truth. They believe that the public should understand who Tim Ballard is and how he uses donor money, before making any future decisions about supporting his organizations.

It is expected that additional lawsuits by additional victims will be filed in the upcoming month. It is also known that there are additional victims that are still weighing whether to come forward. The five women that have filed this lawsuit ask that you give those still struggling with whether to come forward, the time and space to process what has happened to them and to determine what future course of action they desire to take.

The tragic irony is not lost on these five women: that Tim Ballard literally trafficked them for his own sexual and egotistical gratification, all while using the noble causes of fighting trafficking and serving God as his "Ruse." These brave women ask for your patience and privacy at this time while discovery in this case proceeds.

(September 9, 2023)

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**If you do not respond to this document within applicable time limits, judgment could be entered against you as requested.**

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**IN THE THIRD JUDICIAL DISTRICT COURT**  
**SALT LAKE COUNTY, STATE OF UTAH**

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WW, MK, DM, HDT and DS,

Plaintiffs,

v.

TIMOTHY BALLARD, an individual;  
OPERATION UNDERGROUND  
RAILROAD, INC., a Utah Non-Profit  
Corporation; THE SPEAR FUND, a dba for  
a Utah Non-Profit Corporation; ROCKWELL  
GROUP, INC., a Utah Corporation;  
LIBERTY AND LIGHT, a Utah Corporation;  
SLAVE STEALERS, LLC, a Utah Limited

**COMPLAINT AND  
JURY DEMAND  
(Tier 3)**

Civil No.:

Judge:

Liability Company; CHILDREN NEED FAMILIES FOUNDATION, a Utah Non-Profit Corporation; DEACON, INC., a Nevada Corporation; JANET RUSSON, an individual; CRAIG ANDERSON, an individual; JULIAN ANN BLAKE, an individual; WES MORTENSON, an individual; BEN PACK, an individual; MARK REYNOLDS, an individual; STEPHAN FAIRBANKS, an individual; and DOES 1 through 100.

Defendants.

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Plaintiffs WW, DS, HDT, MK, and DM,<sup>1</sup> by and through their counsel, hereby complain against Defendants and allege as follows:

**PARTIES, JURISDICTION, AND VENUE**

1. Plaintiff WW is an adult citizen and resident of the State of Utah.
2. Plaintiff DS is an adult citizen and resident of the State of Utah.
3. Plaintiff HDT is an adult citizen and resident of the State of Utah.
4. Plaintiff MK is an adult citizen and resident of the State of Utah.
5. Plaintiff DM is an adult citizen and resident of the State of Utah.

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<sup>1</sup> Plaintiffs bring these claims using pseudonyms pursuant to protect their safety from the general public and from the Defendants, given their propensity to intimidate those who dare to stand up to them. These are not the real initials of the victims. Once a proper protective order is in place, Plaintiffs will provide their identifying information to Defendants. Given that Ballard committed the acts complained of, he already knows their identities and despite his efforts to blast his face in social and mainstream media, should understand the importance of keeping the identity of a scared and sexually victimized woman, private.

6. Defendant Timothy Ballard, aka Tim Ballard ("Ballard") is an adult citizen and resident of the State of Utah.

7. Defendant Operation Underground Railroad, Inc. ("OUR") is a Utah non-profit corporation.

8. Defendant The Spear Fund is a Utah corporation.

9. Defendant Rockwell Group, Inc. is a Utah corporation.

10. Defendant Liberty and Light is a Utah corporation.

11. Defendant Slave Stealers, LLC, is a Utah Limited Liability Company.

12. Defendant Children Need Families Foundation is a Utah Limited Liability Company.

13. Defendant Deacon, Inc., is a Nevada corporation.

14. Defendant Ballard is the alter-ego and the face of all of the said corporate and company entities that will be collectively referred to as "OUR" as Ballard wore many hats with said companies and no distinction between the companies was made.

15. Defendant Janet Russon is an adult citizen and resident of the State of Utah.

16. Defendant Craig Anderson is a member of OUR's board and is an adult citizen and resident of the State of Utah.

17. Defendant Julian Ann Blake is a member of OUR's board and is an adult citizen and resident of the State of Utah.

18. Defendant Wes Mortenson is a member of OUR's board and is an adult citizen and resident of the State of Utah,

19. Defendant Ben Pack is a member of OUR's board and is an adult citizen and resident of the State of Utah.

20. Defendant Mark Reynolds is a member of OUR's board and is an adult citizen and resident of the State of Utah.

21. Defendant Stephan Fairbanks is a member of OUR's board and is an adult citizen and resident of the State of Utah.

22. The Third Judicial District Court in and for Salt Lake County, State of Utah, has jurisdiction of the claims asserted below pursuant to the provisions of §78A-5-102, Utah Code Ann. (1953 as amended).

23. Venue is properly laid before the Third Judicial District Court in and for Salt Lake County, State of Utah, pursuant to §78B-3-307, Utah Code Ann. (1953 as amended).

24. Pursuant to Rule 26(c)(3), of the Utah Rules of Civil Procedure, the amount in controversy exceeds \$300,000 qualifying this claim for Tier 3 discovery.

### **FACTUAL ALLEGATIONS**

**“One of the saddest lessons of history is this: If we’ve been bamboozled long enough, we tend to reject any evidence of the bamboozle. We’re no longer interested in finding out the truth. The bamboozle has captured us. It’s simply too painful to acknowledge, even to ourselves, that we’ve been taken. Once you give a charlatan power over you, you almost never get it back.” – Carl Sagan**

25. Timothy Ballard is an American activist, speaker, and author.

26. Ballard claims to have worked for the Central Intelligence Agency (CIA) as a special agent in the United States Department of Homeland Security.

27. Ballard founded the non-profit organization Operation Underground Railroad ("OUR") in 2013 that claims to "lead the fight against human trafficking and sexual exploitation worldwide."

28. Ballard founded the non-profit Spear corporation as a landing spot for him after being fired by OUR.

29. The other corporate defendants were created by Ballard in order to funnel the donations coming into OUR into corporate profits and shareholder distributions.

30. At all relevant points in time, Ballard was the CEO, and or manager/member of the above consortium of companies and Ballard was the alter-ego and face of these companies.

31. At all relevant points in time, Defendants Anderson, Blake, Mortenson, Pack, Reynolds, and Fairbanks are and were members of OUR's board (collectively "The Board") and owed fiduciary duties to Plaintiffs, and donors.

32. Defendant Julian Ann Blake is a member of OUR's board and is an adult citizen and resident of the State of Utah.

33. Defendant Wes Mortenson is a member of OUR's board and is an adult citizen and resident of the State of Utah,

34. Defendant Ben Pack is a member of OUR's board and is an adult citizen and resident of the State of Utah.

35. Defendant Mark Reynolds is a member of OUR's board and is an adult citizen and resident of the State of Utah.

36. Defendant Stephan Fairbanks is a member of OUR's board and is an adult citizen and resident of the State of Utah.

37. OUR raised money in order to have conducted multiple sting operations to purportedly rescue trafficked women and children ("OPS"), with OPS being conducted outside the United States.

38. Many of these OPS included wealthy men with no military training, who wanted an "experience vacation" where they dropped into third-world countries to rescue trafficked children, with photo opportunities and stories in the local newspapers of their heroics, all the while flying first class.

39. While promotional and media materials made the OPS appear to be paramilitary drop-ins to arrest traffickers and rescue children, what most OPS consisted of was going to strip clubs and massage parlors across the world, after flying first class to get there, and staying at 5-star hotels, on boats, and at VRBOs across the globe.

40. These OPS were a fund raising machine, though they were more show than substance, and the entire OUR enterprises were funded by donors for these OPS, many of whom held bake sales and literally donated their "widow's mite" to OUR and Tim Ballard.

41. Ballard became the de-facto and most recognized face of anti-child trafficking, which everyone agrees is a most noblest of causes.

42. Ballard became a character of mythical proportions with unquestioned legitimacy.

43. Ballard was appointed as a special advisor to Ivanka Trump in October 2017.



44. Ballard was invited by President Trump to join a White House anti-trafficking advisory board.





45. Ballard was appointed to the White House Public-Private Partnership Advisory Council to End Human Trafficking in 2019.

46. One of Ballard's closest friends is Utah Attorney General Sean Reyes, and Reyes was promoting Ballard, until just recently, to be the next United States Senator from the State of Utah.



47. According to General Reyes' web page, Reyes is the top law enforcement official in Utah, charged with protecting "consumers from those who abuse the law", again providing credibility to Ballard and OUR that was not warranted.

48. General Reyes has repeatedly vouched for OUR and Tim Ballard, even participating in an alleged OP in Colombia, which was well publicized in Utah, giving Ballard

the cover of the top law enforcement officer in the State of Utah to carry out his purposes, including the COUPLES RUSE, even while consumer complaints and criminal investigations were pouring into his office regarding the improprieties of OUR and Ballard.

49. Ballard has been, until recently, business associates and close friends with Apostle and Acting President of the Quorum of the Twelve Apostles M. Russell Ballard ("President Ballard") of "The Church of Jesus Christ of Latter-Day Saints" ("Mormon").

50. President Ballard has cited Ballard to students at Brigham Young University Idaho, as an expert of Book of Mormon Prophet Nephi and the Mormon view of American History.



51. Tim Ballard has met with President Ballard in the Church Administration Building in Salt Lake City, to discuss OUR's work.

52. Ballard has spoken to many Mormon groups across the country, including athletic teams at Brigham Young University.

53. Ballard has authored at least three purported historical books promoting Mormon Nationalism that have been published and sold by the Mormon Church-owned Deseret Book, which were big sellers in the Mormon community and further created the myth of Tim Ballard.

54. Ballard's enmeshment with the Mormon Church further provided him credibility and status in Utah, where the Mormon Church is the largest and founding denomination of the State.

55. Tim Ballard became friends with Glenn Beck, an American conservative political commentator, radio host, entrepreneur, and television producer. Glenn Beck donated significant amounts of money to begin OUR.

56. Tim Ballard and Glenn Beck formed Defendant company Nazarene to fight Christian causes across the globe, and Beck gave Ballard almost unlimited access to the Glenn Beck media network, which further contributed to Ballard's credibility.

57. Tim Ballard became friends with Tony Robbins, an American author, coach, and speaker, who raised staggering amounts of money for Ballard.

58. Documentaries were made of Tim Ballard and OUR, and in 2023, a feature film produced by Mormon-based Angel Studios called, *Sound of Freedom*, was released. The film claimed to portray the work Tim Ballard has done, and the movie has been hugely successful across the globe, adding to the myth of Tim Ballard.

59. One Utah artist painted pictures of Ballard and his wife, again enhancing the credibility of Ballard to an almost Mother Teresa altitude:



60. OUR reported to the IRS \$6.9 million in revenue in 2016, \$22.3 million in 2019, \$45 million in 2020, \$52.930 million in 2021 and \$56.773 million in 2022.

61. In the IRS 990 form, it is reported that Tim Ballard received a salary of \$525,958 in 2022, yet former employees claim that Ballard earned over \$14,000,000 through his for-profit companies (some of which was funneled from the non-profit entity).

62. OUR was making staggering profits as Ballard opened "for profit" companies, defendants, which were alter-egos of OUR and Ballard and that allowed Ballard to line his pockets with the widow's mite.

63. In order to find and save trafficked children, Ballard would receive psychic information from psychic defendant Janet Russon about where the OPS should occur, along with reassurance and justification of everything Ballard did, while predicting the future situations the operatives would be in, so that they could plan the next OP. Ms. Russon claims

that she spoke to a dead prophet named Nephi, who directed her about where to locate the trafficked children.

64. Ballard used OUR and its OPS to fund his personal fantasies of grandeur.

65. Ballard began a program for women accompanying him on OPS and called the program "THE COUPLES RUSE."

66. Ballard claims that the COUPLES RUSE was an undercover tool to prevent detection by pedophiles when Ballard would not engage in sexual touching of the trafficked women offered up to him in strip clubs and massage parlors across the world.

67. Ballard would choose a woman who worked at OUR or with OUR, or would invite a well-intentioned volunteer, to be trained in the COUPLES RUSE.

68. The women he chose had no formal training in paramilitary activities or operations, but he knew they were devoted to the OUR mission of saving women and children from traffickers.

69. Ballard claims that he implemented strict rules regarding the COUPLES RUSE: no kissing on the lips and no touching or exposing private parts.

70. Ballard soon began abusing the COUPLES RUSE and eventually used the ruse as a tool for sexual grooming.

71. As part of either an OP or practice for the OP, Ballard would often share a bed with a woman posing as his girlfriend or invite her to shower in his bathroom, even though accommodations at designated "safe houses" provided separate bedrooms and bathrooms.

72. Before they ever went undercover together, Ballard insisted that he first needed to ensure that he and his female counterparts in the COUPLES RUSE had physical "chemistry" that would be obvious to those they would meet during an operation.

73. Ballard encouraged female operatives to participate in tantric massages before and while on a COUPLES RUSE.

74. Ballard claimed to be so concerned about the believability of the COUPLES RUSE that he frequently asked women to "practice" their COUPLES RUSE long before a mission ever took place.

75. To that end, Ballard flew women across the country, where they would "practice" their sexual chemistry through tantric yoga, couples massages with escorts, and lap dancing on Ballard's lap.

76. Ballard also frequented strip clubs in the Salt Lake Valley with these women to practice the COUPLES RUSE.

77. Ballard included his son, who had just returned from serving a mission for the Mormon Church, to the strip clubs, without Ballard's wife's knowledge.

78. At the strip clubs, Ballard would pay for and receive lap dances, and ingest alcohol and pills at these practice "Ruse Ruses" on OUR's dime with donor monies.

79. Ballard engaged in a ploy where he would tell the women that if they were offered alcohol, which is forbidden by the Mormon Church, that she should take the drink and then open mouth, kiss him and spit the alcohol into his mouth, and then he would spit it out when the traffickers were not looking.

80. However, Ballard was doing the exact opposite—he was consuming excessive amounts of alcohol (tequila) of his own volition, which he drank at strip clubs, massage parlors, and on trips, to the point of passing out. For example, he missed a \$250,000 speaking engagement a few weeks ago because he was drunk and missed his flight.

81. Through these COUPLES RUSES, both in the office and in the field, Ballard eventually engaged in coerced sexual contact with several women and propositioned others.

82. Ballard participated in several sexual acts with the exception of actual penetration, in various states of undress while on an OPS mission.

83. Ballard developed a sexual position where it appeared he was having full on sexual intercourse with his COUPLES RUSE victims, while not actually penetrating.

84. While inside private accommodations, when no one else was around that they needed to fool, Ballard would claim that he and his female partner had to maintain the appearance of a romantic relationship at all times in case suspicious traffickers might be surveilling them at any moment.

85. Ballard requested the women he invited to act as his significant other, to first have a Brazilian wax.

86. Ballard would ask each woman, "Is there anything you wouldn't do to save a child?"

87. To further convince the women of his need for them on the next OPS mission, Ballard would badmouth previous female partners, claiming that the women who had

allegedly gone on COUPLES RUSES in the past were "crazy," and claiming that they had fallen in love with him along the way.

88. Ballard used these mythical stories to motivate the women in his COUPLES RUSE to prove their mettle and their devotion to the cause by trying to outdo their supposed predecessors.

89. When these women found themselves questioning the legitimacy of tactics involving sexual contact, they often doubted their own instincts, relying on Ballard's breadth of knowledge about rescue missions to convince themselves that such tactics were normal.

90. Other employees of OUR would warn these women not to question Ballard or their lives would be put in danger.

91. Ballard would also tell the women that engaging in sex play with him would improve their marriage, even as he also told them not to tell their husbands about what they were doing (or it would compromise the mission, children, their lives, and other informants' lives)<sup>2</sup>.

92. Ballard would repeatedly warn these women that if they failed in their COUPLES RUSE mission, they would have wasted the hard-earned money that honest donors had entrusted to OUR or be caught or killed by the cartel.

93. Ballard would also tell these women that Janet Russon and/or Katherine had chosen them to be part of the COUPLES RUSE.

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<sup>2</sup> In the mind of the victims, this was very real and serious and the cartel was essentially all knowing and seeing.



94. Ballard would use spiritual manipulation to coerce them into sexual contact.

95. Almost all of the women involved are or were Mormon.

96. Ballard began to claim that President M. Russell Ballard had given Ballard permission to do the COUPLES RUSE as long as there was no sexual intercourse or kissing on the lips, and had given him a special priesthood blessing as such.

97. OUR management adopted and accepted the COUPLES RUSE as a standard policy and procedure of the company and allowed Ballard unrestrained allowance on how he enacted the COUPLES RUSE.

98. Ballard would also claim that a passage from the Book of Mormon, in which a man kills another man on the promptings of the Holy Spirit, demonstrates that sometimes the Holy Spirit asks people to perform "unconventional" tasks.

99. Ballard would also claim to the women that Defendant Janet Russon told him that he had been married to them in a previous life, and so their conduct was appropriate.

100. Additionally, Ballard would get ketamine treatments and have a scribe come in with him while he would talk to the dead prophet Nephi and issue forth prophecies about Ballard's greatness and future as a United States Senator, President of the United States, and ultimately the Mormon Prophet, to usher in the second coming of Jesus Christ.

101. Ballard would also claim to his female Ruse partners that if his wife Katherine were to die, he would immediately marry them.

102. Ballard told one of his victims that when his wife would question what Ballard was doing with these women, Ballard would tell his wife that his female partners kept falling in love with him and wanted to kill Katherine so that they could be together.

103. Ballard would insist that the women stay silent about their alleged sexual encounters with him because if they told anyone, it would put everyone's lives at risk on the OPS mission, it was necessary to save the trafficked children, and because he was blessed by President Ballard to be a future President of the United States and then the Prophet of the Mormon Church.

104. After the women were coerced into engaging in sexual activity with Ballard, he used their encounters to his advantage, sending texts to some of the women that would say something to the effect of "We will have so much s\*\*\* on each other.... we will be deterred into silence on all things forever."

105. Ballard gave the women burner phones to use and had them use Signal, a messaging app that keeps communication private, and he frequently demanded that the women erase the digital traces of his conversations with them each night.

106. Ballard also threatened the women that he was tracking them with their burner phones and company phones he provided.

107. Additionally, he required the women he asked to go on OPS as part of the COUPLES RUSE to sign Non-Disclosure Agreements (NDA), claiming it was required to protect the safety of the children and the participants.

108. Ballard would then threaten to sue the women if they ever disclosed anything about his tactics, practice OPS, or the COUPLES RUSE.

109. At least two marriages have broken up as a result of Tim Ballard's actions with these women.

110. Ballard offered to pay for the divorce attorney of one of his victims, and had a henchman call and threaten her husband on voice message, resulting in the police being called and an investigation conducted.

111. Finally, in the Spring of 2023, some of the female employees of OUR who had been on these Couple Ruse OPS or practices, came forward to OUR management.

112. OUR had its law firm, Holland & Hart, conduct an "external" investigation, which investigation verified the victims' claims.

113. OUR terminated Tim Ballard.

114. OUR's board of directors, most of whom are related to Tim Ballard or are his good friends, opposed the firing and came to Ballard's aid.

115. A joint plan was hatched between OUR and Ballard, whereby he would resign ostensibly because of the appearance of a conflict of interest with the release of *Sound of Freedom*, in which he has a financial interest in; Ballard would take a very lucrative severance agreement and remain the face of OUR so it could continue to raise money.

116. As part of the plan, everyone was required to sign a NDA.

117. With his image intact, Ballard began The SPEAR Fund, where he is able to continue raising money from well-intentioned people wanting to end human trafficking.

118. OUR remained silent, using his face and the world-wide opening tour of *Sound of Freedom* to raise money, and allowing Ballard to continue his grooming, drinking and sexual deviancy; all on the donors' dime.

119. Finally, some of the victims of Ballard's sexual exploits are boldly coming forward and are filing this action for their damages, holding the defendants responsible for their outrageous behaviors, to punish the defendants for their actions, to try and prevent them from acting in this fashion again, and to bring light to who and what Tim Ballard is so that the humble, very well-intentioned donors across the world can decide with eyes open, whether to donate to Ballard and his organizations.

120. Upon reasonable belief and inquiry, upon learning of the COUPLES RUSE and how Ballard used it, the Mormon Church excommunicated Ballard.

121. The Defendants, including and especially Ballard, engaged in a fraud in order to engage in sexual relations with the Plaintiffs, the fact of which are specifically set forth in each of the Plaintiffs statements that are attached and incorporated herein.

122. WW's statement is incorporated herein and is attached as Exhibit A.

123. DS's statement is incorporated herein and is attached as Exhibit B.

124. DM's statement is incorporated herein and is attached as Exhibit C.

125. MK's statement is incorporated herein and is attached as Exhibit D.

126. HDT's statement is incorporated herein and is attached as Exhibit E.

127. There are other victims of Tim Ballard's COUPLES RUSE that are not part of this case and if and when these victims join the case, the complaint will be amended.

**FIRST CAUSE OF ACTION**  
**(SEXUAL ASSAULT AND BATTERY BY ALL PLAINTIFFS AGAINST**  
**DEFENDANT TIM BALLARD)**

128. Plaintiffs incorporate the preceding allegations and the attachments to this complaint, as if fully set forth herein.

129. Defendant Ballard, intentionally, knowingly, or recklessly, committed battery and sexual assault of Plaintiffs, as all sexual touching was done under the COUPLES RUSE in order to help save trafficked children and women.

130. As a direct and proximate result of the wrongful conduct of Ballard, Plaintiffs have suffered severe emotional distress, permanent injury, loss of self-esteem and other injuries, all to their general damages in reasonable sums.

131. As a direct and proximate result of the wrongful conduct of Ballard, Plaintiffs have incurred and will yet incur medical and therapy expenses, and lost wages all to their special damages in a reasonable sum.

WHEREFORE, Plaintiffs pray for relief as set forth below.

**SECOND CAUSE OF ACTION**  
**(CONSPIRACY TO COMMIT BATTERY AND SEXUAL ASSAULT BY ALL PLAINTIFFS AGAINST ALL DEFENDANTS)**

132. Plaintiffs incorporate the preceding allegations and the attachments to this complaint, as if fully set forth herein.

133. The COUPLES RUSE was an institutional doctrine of OUR and its affiliated companies and was done with the knowledge of Defendants' management and board members.

134. The Defendants intentionally, knowingly, or recklessly, solicited, instructed, commanded, encouraged and/or intentionally committed battery and sexual assault of the Plaintiffs, all for the sexual gratification of Tim Ballard.

135. The Defendants conspired and combined together for the purpose of Ballard being allowed to have sexual relations with the Plaintiffs.

136. The object of the conspiracy was illegal and carried out as the result of a calculated plan between the Defendants.

137. There was a meeting of the minds among the defendants with regard to the COUPLES RUSE and how to allow Ballard to sexually abuse the Plaintiffs.

138. As a direct and proximate result of the wrongful conduct of Defendants, Plaintiffs have suffered severe emotional distress, permanent injury, loss of self-esteem and other injuries, all to their general damages in reasonable sums.

139. As a direct and proximate result of the wrongful conduct of Defendants, Plaintiffs have incurred and will yet incur medical and therapy expenses, and lost wages all to their special damages in a reasonable sum.

WHEREFORE, Plaintiffs pray for relief as set forth below.

**THIRD CAUSE OF ACTION**  
**(FRAUD BY ALL PLAINTIFFS AGAINST DEFENDANT BALLARD)**

140. Plaintiffs incorporate the preceding allegations and the attachments to this complaint, as if fully set forth herein and more specifically, incorporate the statements attached hereto for the specificity of the fraud.

141. Defendant Ballard made fraudulent statements and actions based upon the COUPLES RUSE.

142. Defendant Ballard's actions and statements towards Plaintiffs were fraudulent and were done for Ballard's sexual gratification and pleasure.

143. Defendant Ballard made representation(s) about the COUPLES RUSE, who approved it and how it helps in fighting human trafficking, which were false, and the Defendant Ballard knew to be false, for the purposes of inducing the Plaintiffs into

participating or attempting to have them participate, in the COUPLES RUSE, so that Ballard could act out his sexual proclivities.

144. Defendant Ballard knew that the Plaintiffs would act on his representations in ignorance of their falsity and the Plaintiffs did rely upon said representations and were induced to act, all to their injury and damage for over two and a half years.

145. As a direct and proximate result of the wrongful conduct and frauds of Defendant Ballard, Plaintiffs have suffered severe emotional distress, permanent injury, loss of self-esteem and other injuries, all to their general damages in reasonable sums.

146. As a direct and proximate result of the wrongful conduct of Defendant Ballard, Plaintiffs have incurred and will yet incur medical and therapy expenses, and lost wages, all to their special damages in a reasonable sum.

WHEREFORE, Plaintiffs pray for relief as set forth below.

**FOURTH CAUSE OF ACTION**  
**(CIVIL CONSPIRACY TO DEFRAUD BY ALL PLAINTIFFS AGAINST ALL DEFENDANTS)**

147. Plaintiffs incorporate the preceding allegations and the attachments to this complaint, as if fully set forth herein and more specifically, incorporate the statements attached hereto for the specificity of the fraud.

148. Defendants developed the COUPLES RUSE and had a meeting of the minds with each other to allow Ballard to make fraudulent statements and actions based upon the COUPLES RUSE.

149. There was a meeting of the minds between the defendants to carry out this fraud upon Plaintiffs and others.

150. The sexual actions of Ballard and Cooper set forth in the Exhibits to this complaint are based upon false pretense and outright lies, are illegal, criminal, and immoral.

151. Defendants knew that the Plaintiffs would act on their fraudulent representations in ignorance of their falsity and the Plaintiffs did rely upon said representations and were induced to act, all to their injury and damage.

152. As a direct and proximate result of the wrongful conduct and frauds of Defendant Ballard, Plaintiffs have suffered severe emotional distress, permanent injury, loss of self-esteem and other injuries, all to their general damages in reasonable sums.

153. As a direct and proximate result of the wrongful conduct of Defendant Ballard, Plaintiffs have incurred and will yet incur medical and therapy expenses, and lost wages, all to their special damages in a reasonable sum.

WHEREFORE, Plaintiffs pray for relief as set forth below.

**FIFTH CAUSE OF ACTION**  
**(INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS AGAINST ALL DEFENDANTS)**

154. Plaintiffs incorporate the preceding allegations and the attachments to this complaint, as if fully set forth herein.

155. The COUPLES RUSE was an institutional doctrine of OUR and its affiliated companies and was done with the knowledge and Defendants' management and board members.

156. The conduct of the Defendants, as set forth herein, was outrageous and intolerable in that it offended the generally accepted standards of decency and morality.

157. As a direct and proximate result of the wrongful conduct of Defendants,



Plaintiffs have suffered severe emotional distress, permanent injury, loss of self-esteem and other injuries, all to their general damages in reasonable sums.

158. As a direct and proximate result of the wrongful conduct of Defendants, Plaintiffs have incurred and will yet incur medical and therapy expenses, and lost wages, all to their special damages in a reasonable sum.

WHEREFORE, Plaintiffs pray for relief as set forth below.

**SIXTH CAUSE OF ACTION**  
**(OUTRAGE AGAINST ALL DEFENDANTS)**

159. Plaintiffs incorporate the preceding allegations and the attachments to this complaint, as if fully set forth herein.

160. The conduct of the Defendants, as set forth herein, was so extreme that it went beyond all possible bounds of decency and is regarded as atrocious and utterly intolerable in a civilized society.

161. As a direct and proximate result of the wrongful conduct of Defendants, Plaintiffs have suffered severe emotional distress, permanent injury, loss of self-esteem and other injuries, all to their general damages in reasonable sums.

162. As a direct and proximate result of the wrongful conduct of Defendants, Plaintiffs have incurred and will yet incur medical and therapy expenses, and lost wages, all to their special damages in a reasonable sum.

WHEREFORE, Plaintiffs pray for relief as set forth below.

**SEVENTH CAUSE OF ACTION**  
**(NEGLIGENT INFLECTION OF EMOTIONAL DISTRESS AGAINST ALL DEFENDANTS EXCEPT BALLARD)**

163. Plaintiffs incorporate the preceding allegations and the attachments to this

complaint, as if fully set forth herein.

164. The COUPLES RUSE was an institutional doctrine of OUR and its affiliated companies and was done with the knowledge and Defendants' management and board members.

165. The conduct of the Defendants, as set forth herein, was negligent and violated the standards of care required to protect the plaintiffs.

166. As a direct and proximate result of the wrongful conduct of Defendants, Plaintiffs have suffered severe emotional distress, permanent injury, loss of self-esteem and other injuries, all to their general damages in reasonable sums.

167. As a direct and proximate result of the wrongful conduct of Defendants, Plaintiffs have incurred and will yet incur medical and therapy expenses, and lost wages, all to their special damages in a reasonable sum.

WHEREFORE, Plaintiffs pray for relief as set forth below.

**EIGHTH CAUSE OF ACTION**  
**(NEGLIGENT SUPERVISION AND RETENTION OF BALLARD BY ALL PLAINTIFFS AGAINST "OUR" DEFENDANTS)**

168. Plaintiffs incorporate the preceding allegations and the attachments to this complaint, as if fully set forth herein.

169. At the time the sexual assaults by Ballard were performed under the guise of the COUPLES RUSE, the OUR defendants were responsible for hiring, appointing, retaining and supervising Ballard.

170. Said defendants negligently allowed Ballard to continue and develop The COUPLES RUSE was an institutional doctrine of OUR and its affiliated companies and was

done with the knowledge and Defendants' management and board members.

171. The conduct of the Defendants in retaining and supervising Ballard after it became aware of how Ballard was abusing the COUPLES RUSE, as set forth herein, was negligent and violated the standards of care required to protect the plaintiffs.

172. As a direct and proximate result of the wrongful conduct of Defendants, Plaintiffs have suffered severe emotional distress, permanent injury, loss of self-esteem and other injuries, all to their general damages in reasonable sums.

173. As a direct and proximate result of the wrongful conduct of Defendants, Plaintiffs have incurred and will yet incur medical and therapy expenses, and lost wages, all to their special damages in a reasonable sum.

WHEREFORE, Plaintiffs pray for relief as set forth below.

**NINETH CAUSE OF ACTION**  
**(NEGLIGENCE BY ALL PLAINTIFFS AGAINST ALL DEFENDANTS)**

174. Plaintiffs incorporate the preceding allegations and the attachments to this complaint, as if fully set forth herein.

175. The Defendants owed duties of care to Plaintiffs that they negligently breached by allowing the COUPLES RUSE in the first place and by allowing Ballard to use the COUPLES RUSE to abuse women.

176. As a direct and proximate result of the wrongful conduct of Defendants, Plaintiffs have suffered severe emotional distress, permanent injury, loss of self-esteem and other injuries, all to their general damages in reasonable sums.

177. As a direct and proximate result of the wrongful conduct of Defendants, Plaintiffs have incurred and will yet incur medical and therapy expenses, and lost wages, all to

their special damages in a reasonable sum.

WHEREFORE, Plaintiffs pray for relief as set forth below.

**TENTH CAUSE OF ACTION**  
**(PREMISES LIABILITY BY ALL PLAINTIFFS v. OPERATION UNDERGROUND RAILROAD)**

178. Plaintiffs incorporate the preceding allegations and the attachments to this complaint, as if fully set forth herein.

179. Plaintiffs were business invitees upon Operation Underground Railroad's premises and were owed duties of care to care for Plaintiffs' well-being and safety.

180. Defendant Operation Underground Railroad, by allowing the COUPLES RUSE to knowingly occur on its premises, violated the duties owed to Plaintiffs.

181. As a direct and proximate result of the wrongful conduct of Defendant Operation Underground Railroad, Plaintiffs have suffered severe emotional distress, permanent injury, loss of self-esteem and other injuries, all to their general damages in reasonable sums.

182. As a direct and proximate result of the wrongful conduct of Defendant Operation Underground Railroad, Plaintiffs have incurred and will yet incur medical and therapy expenses, and lost wages, all to their special damages in a reasonable sum.

**ELEVENTH CAUSE OF ACTION**  
**(BREACH OF FIDUCIARY DUTIES BY ALL PLAINTIFFS AGAINST THE BOARD DEFENDANTS)**

183. Plaintiffs incorporate the preceding allegations and the attachments to this complaint, as if fully set forth herein.

184. The Board Defendant are members of the board of Defendant Operation

Underground Railroad.

185. The Board Defendants owed the Plaintiffs a duty of protection, loyalty, duty of care, and utmost good faith, as this is a non-profit organization.

186. The Board Defendants breached these duties by directing company assets and permission to Tim Ballard to carry out the COUPLES RUSE and sexually assault his female victims using the indicia and resources of OUR.

**TWELFTH CAUSE OF ACTION**  
**(PIERCING THE CORPORATE VEIL AGAINST ALL CORPORATE DEFENDANTS)**

190. Plaintiffs incorporate the preceding allegations and the attachments to this complaint, as if fully set forth herein.

191. Defendant Tim Ballard and the Corporate Defendants are alter egos of each other.

192. The Corporate Defendants and Defendant Tim Ballard should all be treated as one entity to prevent Defendants from using the corporate fiction as a tool to inflict civil harm upon Plaintiffs.

193. The corporate fiction of the Corporate Defendants should be disregarded because they have been used as part of an unfair device to achieve an inequitable result.

194. The corporate structures of the Corporate Defendants should not shield fraud, evasion of existing obligations, circumvention of statute, and the like. As a result, the corporate veil should be pierced to provide that all Corporate Defendants are jointly

and severally liable for the damages.

**PRAYER FOR RELIEF**

**WHEREFORE**, Plaintiffs pray for judgment against Defendants as follows:

1. For general damages in an amount to be proved at trial;
2. For special damages in an amount to be proved at trial;
3. For punitive damages against all defendants in an amount sufficient to punish them and to deter them and others in similar situations from engaging in such conduct in the future; and
4. For such other costs, interest, expenses, attorney's fees, and other relief the Court finds appropriate under the circumstances.

**JURY DEMAND**

Pursuant to Rule 38(b) of the Utah Rules of Civil Procedure, Plaintiffs hereby demand a trial by jury in this case and submit herewith the applicable fee.

DATED this 9<sup>th</sup> day of October, 2023.

**ALL UTAH LAW PLLC**

/s/ Suzette Rasmussen  
Suzette Rasmussen

**GREEN LAW PLLC**

/s/ Michael K. Green  
Michael K. Green

**MORTENSEN MILNE**

/s/ Alan W. Mortensen  
Alan W. Mortensen  
Christopher J. Cheney

Plaintiffs' Address:  
c/o MORTENSEN/MILNE  
68 South Main Street, Suite 700  
Salt Lake City, UT 84101

## EXHIBIT A

### STATEMENT OF WW

On April 19, 2021, WW reached out to Ballard via Instagram because she was dating a man that she thought might be involved in trafficking.

WW didn't know who else to turn to about her suspicions, but she trusted that Ballard and OUR were the right resources to report it to since they work with law enforcement to fight trafficking.

On April 20<sup>th</sup>, 2021, Ballard responded via Instagram and invited WW to his office in Lehi to discuss her concerns.

As WW came into Ballard's office, she perceived that OUR employees were suspicious and leery of her.

WW gave Ballard information about the man she had been dating, with whom she had growing suspicions.

Ballard told WW to give him the man's phone number, and he would give it to his guys to check him out.

Ballard then said he noticed from WW's Instagram profile that she was an actor.

Ballard asked if WW had ever considered going undercover.

WW answered "no," but that she would definitely consider it.

Ballard had WW sign an NDA and told WW how important it was that she never speak a word to ANYONE, not even friends or boyfriends, "because people's lives were on the line." He explained further the gravity and severity of what was at stake in order to protect women and children and the OPS.

WW was not given a copy of this NDA.



Ballard then proceeded to tell WW that female operators are crucial to OUR's work.

Ballard told WW about a tactic they used, called the COUPLES RUSE.

Ballard explained that they were running into problems on operations (OPS) when male operators did not engage in sex acts. He said that if male operators don't touch the women or children, the traffickers would figure out that it was a sting and would create danger for all.

Ballard told WW how the COUPLES RUSE came to him by revelation from God, as there was no way he could have thought up such a brilliant ruse.

Ballard then told WW that if she would act like the jealous girlfriend, then she could "block" for Ballard and Ballard would "block" for her.

Ballard explained that WW was like the "cock blocker."

Ballard expounded by saying that he would take women into couples massage parlors or strip clubs and act as a kinky couple ready to do sexual and deviant things, but that there would be no kissing and no touching genitals, except for his arms around the woman's waist, "maybe on your back pocket, etc.," and that it would be super safe cause there would be a team around the corner watching everybody's safety.

Ballard explained to WW that if she agreed to go on an OP, she would be part of the communications, by watching and reporting on activities surrounding the sting.

Ballard told WW that he preferred to hire actors because cops could not act very well, resulting in the traffickers not being fooled.

Ballard explained that traffickers can smell cops miles away.

Ballard asked WW what she thought, and she responded that she was on board because she was a rape survivor herself and felt strongly that she should help women and children.

Ballard responded by asking, “You are a survivor yourself ? Wow!!! That would be a powerful story.”

Ballard then instructed WW to get “training,” and he would go over more details later.

Ballard then told WW that there was a fast approaching operation, and that he really needed someone quickly.

On April 21, 2023, Ballard put WW in a text thread with Defendant Matt Cooper.

Ballard texted WW from a phone number Ballard instructed her to label as “Brian” for “safety” purposes.

That phone number was 520-406-1139.

Ballard then introduced WW to Matt Cooper and informed her that she was being considered for an OPS position, and that she should get a background check in order to attend a survivor’s graduation.

Ballard further stated that the OPS team would meet that Friday around noon, where Ballard would run her through tacticals and finish conversations.

On April 23, 2023, WW attended a survivor’s graduation.

Matt Cooper (Coop) was there with Ballard and WW.

Ballard had told WW prior that her OP name would be “Kelli”, but then Coop had introduced WW as WW.

WW was confused as she was afraid Matt Cooper had compromised the OP, as Ballard had earlier stressed how serious everything was.

WW asked Matt Cooper if she was compromised because he had said her real name.

Matt Cooper responded “no”, and reassured her that she was safe..

Ballard had told WW to keep track of all her hours while preparing and working on the OP.

Ballard understood that WW was a single mom at the time.

Ballard asked WW if she could go on an upcoming op because the original girl could not go.

WW was moving by herself, so she explained that she could not go on an OP on such short notice.

Ballard responded by offering to pay for a moving van and movers to help so WW could go.

WW felt honored by the generosity of OUR.

Ballard told WW that they would be talking a lot, because they had to create a relationship to convince the traffickers that they were a couple, so they needed to get to know one another.

In some of their training, Ballard brought up the name of Hugh V., a person WW actually knew prior to meeting Ballard, and who was a huge part of WW's healing from her own abuse.

Ballard told WW that Hugh was **not** to be trusted, along with many other people in his organization.

WW was sad to hear that about Hugh, but WW trusted Ballard.

Ballard told WW that the other operators would fall in love with him, so he had to change operators often.

Ballard also asked WW to never betray him.

Ballard mentioned a journalist who wrote a negative article about him who he said was just out to get him and the cause, but no one believed her and he "buried her."

Ballard then told WW that text messages needed to be sent via Signal, and everything, including messages via Signal or their regular phone messaging, was to be deleted every night because it was IMPERATIVE to the safety of the case.

Ballard warned that if anything got leaked, it could put people's lives at risk.

On April 28<sup>th</sup>, 2021, WW received an email from "Hugh V." asking her about Ballard's relationship with her.

WW immediately told Ballard about the email. Ballard said his team was just looking out for Ballard and testing WW's loyalty to Ballard, and that WW passed.

At one of the training sessions, Ballard was briefing WW for the upcoming OP.

Ballard dismissed the others from his office, telling them he needed to prepare WW for the mission.

As WW sat on a couch in Ballard's office, Ballard told WW that he needed to get to know more about WW so that they were comfortable with each other.

Ballard asked questions about WW's current relationship, her children, and the trauma abuse as a child.

Ballard again said that it would make an amazing story.

Ballard came over to sit by WW and kept getting closer to WW until at one point, Ballard put his hand on WW's leg and caressed her inner thigh.

WW immediately tensed up but thought that Ballard was testing her and that she should just keep talking as if nothing were happening.

WW kept talking as Ballard stroked her neck.

Ballard finally got frustrated that she wasn't responding to his advances and asked WW, "Why are you not responding?!?"

WW responded, "Because I know you are testing me."

Ballard said he needed to know WW was attracted to him. Ballard asked WW if she was attracted to him to which WW said not in that way. Ballard asked how WW could convince traffickers of chemistry then? WW told him she did not need to practice because that was what she was trained to do as an actor- get in to character when in role but only on "action" and out on "cut". WW explained she never "practiced" chemistry or romance scenes privately/outside of being on set in front of the camera and crew either.

Ballard then stated that this was the practice he mentioned and that WW needed to be attracted to him in order to convince traffickers that they were a "kinky couple."

Ballard told WW that he must know she could pull this off as a prior female op went out on a mission once and couldn't perform so all those donor dollars were wasted and the mission to save kids failed.

At that point WW felt sheepish for thinking she knew better than Ballard, so she told him she would turn it on for just a moment for him to see that as an actor, she could turn it on and then turn it right back off.

Ballard agreed.

WW approached Ballard in the hallway outside of Ballard's office and put her hand on his chest and spoke to him seductively saying she could turn it on if she needed to and then pulled back immediately, but at that point, Ballard got excited and said, "Oh good, ok you can do this!"

WW asked Ballard if there were cameras in the building. He panicked and looked around and said, "No, no we are good."

Ballard continued in his COUPLES RUSE training, instructing WW that from the moment they got inside a plane heading to the location, inside cars, walking on the streets, anywhere except for the safe house, they were supposed to be in character as a kinky couple because the traffickers have people watching them at every move.

On May 3, 2021, WW met at OUR's offices with a hair and makeup artist to teach WW how to apply fake tattoos on Tim and herself for the upcoming Puerto Vallarta, Mexico OP.

On May 5<sup>th</sup> 2021, OUR employee, Mike Porenta, made all the arrangements for WW to fly out to Dallas, Texas.

WW and Ballard stayed in a house in Irving, Texas, so that they could meet with Glenn Beck before flying out from DFW to Puerto Vallarta the next day. OUR employee, David Jacobs, met Ballard and WW at the Irving house and wrote a note to them that read in part, "Go Get Them! XoXoXo".

At Glenn Beck's home, Ballard spoke about how he had to remove the cancer from OUR, and that many were out to get him.

Beck sympathized with Ballard, sharing his own experiences about how people would try to get him and that he had to hit rock bottom, with people going through his trash. He told Ballard that he may have to go through that too

Ballard said he already hit rock bottom when he realized so many were out to get him and had to make all the changes in his company.

On May 6, 2021, Ballard and WW flew out to Puerto Vallarta.

Ballard went into immediate character from the DFW airport to Puerto Vallarta.

Ballard was all over WW, with his hands on her buttock and his hands wrapped through WW's legs while sitting on the airplane.

Ballard and WW finally arrived at the very large "safe house" that overlooks the ocean, and has a private chef. The secondary team stayed in a second location.

WW had her own room and Ballard had his.

The next day, while the chauffeur drove Ballard and WW around, Ballard was in the backseat groping WW.

The windows were dark, but Ballard insisted they had to remain in character.

On at least one occasion, Ballard's hand got quite close to WW's groin area.

WW told him that he didn't have to be so close, so he pulled back.

Ballard explained that they were going out to find massage parlors.

WW asked him how she could avoid having to get naked in those massage parlors.

Ballard responded by telling her it would be fine if she stayed in her underwear.

Ballard said WW could lay face down on the shared massage table, and he would lay face up so that they could still talk to one another in their ears.

WW expressed concerns to Ballard, telling him that she knew the "massage therapists" would want her to take her bra off, which she didn't want to do, so she said her story would be that she had a boob job and she could not take her bra off for support purposes.

Ballard assured WW that he would help express that, as the escorts may be speaking in Spanish.

Ballard is fluent in Spanish, but WW is not.

Ballard located a massage parlor and instructed the driver to drop them off.

They were then taken to the back massage room, where they undressed and got on the table.

WW was in a bra and underwear.

Two women came into the room, and Ballard started speaking to them in Spanish.

The two women took their own clothes off, down to their underwear too, and started massaging WW and Ballard.

Ballard asked questions which then led to talking to them about a party, and him asking for “frescas”—younger girls.

Ballard instructed WW that if the escorts got too close to touching them, the code word was FUCK ME, to which it was WW’s job to convince the women that WW needed to fuck her boyfriend and get the women out of the room.

One of the massage girls undid WW’s bra and WW responded, “oh no no” and told Ballard (whose OP name was “Brian”) to tell the women, in Spanish, why she needed to keep her bra on.

Ballard repeated what WW said, but only in English, not Spanish, and the women did not care.

Ballard said the code word and WW immediately pretended to be jealous, telling the escorts not to touch Ballard.

WW next said the code word because one of the women went straight for WW’s crotch.

Ballard did not respond to protect her, so WW repeated it again.

Again, Ballard did not respond to protect her, at which point WW understood that she needed to get the women out of their room or she may be compromised and was in extreme danger.

As part of the Ruse, WW kissed Ballard’s neck and rubbed his belly and told the women to leave as she needed to f--- her boyfriend.

However, the women just stood back to watch.



WW rolled over on top of Ballard so that the women could see that she was serious, as WW was very scared that the women would not believe them and leave her alone.

WW told them again to leave, this time with enough anger that the women left.

Once the women left, WW realized she was topless on top of Ballard's chest.

WW immediately got off and got dressed. A trafficker had shown up and a conversation ensued. WW and Ballard left this massage parlor and WW immediately had a panic attack. Ballard told WW "you are burning up" as WW was burning up and was shaking. WW could barely walk from shaking about what just happened. Ballard gave her a few moments to breathe and then they were off to the next parlor.

Over the next three days, Ballard and WW had similar experiences in massage parlors across Puerto Vallarta.

After one such sting in which WW obtained some phone numbers of "traffickers", Ballard screamed WW's accolades in the car after, saying he couldn't believe what WW was able to do, as she got so many phone numbers that would allow OUR to save so many children.

WW then told Ballard that she was sorry about what happened at the first massage parlor, to which Ballard responded that it was ok, because he and his other operators would "accidentally kiss" because they were so in character.

Ballard also revealed that they would often sleep together in the safe house next to each other, snuggling, because the Ops are so traumatic.

Ballard said that sometimes things would happen in his couples ruse and he would just have to go ejaculate as things got too steamy.

WW told Ballard "That's interesting. That won't be me."

At one of the parlors, the female trafficker and Ballard were talking about something to which the female came directly to WW and grabbed her breasts and crotch. WW said the code word, trying to play it off and looked at Ballard for reprieve. Ballard just watched. At one point said female trafficker brought up a younger female to take her clothes off down to her underwear and turn around for "Brian" to approve for an upcoming party. Tim approved and the young female was dismissed. The older female trafficker did not want to wait for any upcoming party and wanted to partake of WW now. WW immediately knew she was going to be raped if she didn't get out as the female kept grabbing her forcefully that WW fell on the bed. WW knew she had to get herself out so she made up a story that there was a meeting they had to get to. Ballard said "what meeting?". WW left Ballard and went outside. Ballard got upset with WW saying "why'd you leave we were so close to getting information". WW told Ballard she feared she was going to be raped and was upset he didn't help her. Ballard told her he would never had let it go too far to which WW again felt bad for doubting Ballard and worried she stopped the opportunity for kids to be saved.

When they were at the safe house, in between these "massage parlor missions", Ballard would answer his door in just his towel and still have her come in to talk about the OP.

Ballard kept saying, "You know I'm clean, right? I don't even get turned on by this stuff you see. I don't even get a boner."

WW asked Ballard why he still went on Ops when he told everyone he was not doing them anymore.

Ballard responded that Elder Ballard sanctioned the Couples Ruse and it was his [Ballard's] calling to do Ops.

At one point, WW had to go shower and get ready for an Op when Ballard said, "You can use my shower," to which WW responded, "No thank you, I've got my own." Ballard double checked with her saying he would leave the room and she still said no.

Later while they were eating at the safe house, Ballard confided in WW that things with Katherine weren't the best.

WW asked Ballard if Katherine knew about the Couples Ruse, to which he said she did.

WW asked Ballard if she knew all the details though, and he responded that she is such a saint she does not ask questions, as she is willing to do anything to save the kids.

WW told Ballard that he should stop doing Ops and be home with his family to heal, as his PTSD was very apparent and he needed to rest and just be with his family.

The last night in Puerto Vallarta was when Ballard took WW to strip clubs.

Prior to this last night WW had expressed to Matt Cooper that she was concerned about Ballard. She confided a bit to him that Ballard had been distracted, worried about her betraying him the whole time, and didn't protect her. Coop listened to her and said Ballard did need some help but that was the extent.

Ballard told WW that she was to "block" for Ballard, and the goal was to get some girls into the back private rooms to ask questions and get phone numbers.

Coop, Matt O., and Jorge were all there as secondary in another part of the club.

WW was mentally, emotionally, physically compromised after what it took to get a couple phone numbers at this club and told Ballard she had to be taken back to the safe

house. As WW was leaving the sting, she observed Jorge heading to a back room alone with one of the strippers for what was going to be a pleasure trip after the Op. Ballard told WW she had done an incredible job this trip and had done enough.

After getting back to the secondary team's safe house, Ballard explained WW was done and had a super successful trip but that he and a couple others were going to go check out one more spot. They were gone for a few hours with no "blocker" and no comms. Matt O. and a couple other secondary team members were with WW and kept getting angry and worried saying "this isn't right."

WW warned Ballard that type of conduct that she saw with Jorge as well would take down OUR. WW told Ballard "either you tell someone or I will." Ballard responded "You can't do that to me," to which WW said "watch me". The next day Omar and Ballard had a private chat with WW telling her thank you for letting them know. Omar told WW the rule was that no operator should operate without their blocker and that can't happen so he would take care of it.

WW also learned that DS was one of the other operators. WW knew DS from her line of work and had deep affinity for DS.

When Ballard found out that WW cared about DS, he told WW that DS had crossed the boundaries and kissed him.

Ballard told WW that DS was in love with him, and that she was the one that when he met WW at the very beginning in David Jacob's office, that he had explained was in love with him and that's why he had to get new operators.

When WW got home, she immediately had nightmares and knew she was re-traumatized.

She was also paranoid of being watched, or saying anything about it, and her boyfriend at that time (her current husband) was very concerned for her.

Ballard continued telling her that he needed her on the next Op, and that he was super excited because it was this really cool place with an amazing house and boat.

WW told Ballard that she was re-traumatized, and it wasn't wise for her to go on another Op.

Ballard said he would pay for her to go to his therapist, in order to see if his therapist could help WW be able to get back out there. Ballard told WW that she made the **most** difference out of any other operators.

WW went to see Ballard's therapist, Kelly McCaleb.

Ballard was pretty persistent about her coming back out and she told him no several times.

Ballard told her she could maybe do a secondary but then after thinking she said no to that too.

Ballard then said, "Well, what if you become the female face of OUR.?"

Ballard knew her dream was to be speaking on stages so she said "Oh my gosh yes!! I could still help the cause!"

Ballard helped the ruse by telling her that they needed to probably have better training for operators so was going to have future training for it and to watch for it so they could get footage and since she had "kicked ass" on the undercover op and was a survivor herself this would be a HUGE thing.

Before the training Ballard text her in July to tell her that he was pulling out of ops to be with his family.

She told him she was proud of him.

He had asked for replacement female ops for other operators; she told him she may have someone and recommended DM.

WW went to the OUR op training held in Salt Lake City as she believed they were turning things around. They had the cameras follow her around a lot.

She gave them an interview too and Ballard told people she would be the face and this was for speaking.

After this training, DM (who did not attend the official training) called WW saying she needed to talk to WW but that she couldn't talk over phone it had to be in person.

She told her she went to meet with Coop and Tim for being considered for the position but things happened and she wanted to know if it was normal.

WW and others were told to not even talk to one another because of safety so WW knew why DM was nervous and scared to talk to her.

DM told her Tim had pushed her up against the wall and licked her stomach and then went out on a fake op practice at a local club where he was taking pills while his son was there.

DM thought it was strange and wanted to know if it was normal.

That is when WW snapped and realized this was not normal.

WW then started questioning her own experience.

WW then called Tim and told him that she could no longer be a part of OUR, even as a speaker.

Ballard was frustrated and sad and kept trying to get her to come speak for another year.

Ballard also invited her to a separate private meeting no one knew of and that he was starting to do his own ops.

WW didn't go and kept asking the status of the op they went on if they had rescued those kids.

Ballard kept telling her it just took time but they were making progress.

DM told WW that she had verbalized to Ballard and Coop her boundaries, that she did not want to do things, and didn't need to practice, and then they dropped her.

WW wanted to tell Matt Osborne of her concerns at the training anyway prior to this, but thought she couldn't trust anyone and felt so small compared to Ballard as he had told her he would deny everything if she said anything and she would be buried

# EXHIBIT B

## DS's Statement regarding Operation Underground Railroad

### Summary:

Many many many times he touched me in sexual ways though not always close to private parts, but definitely trying to create a sexual connection by the words he spoke and the ways he touched. Definitely getting a fill and trying to turn me on as well. He would often ask about my sexual life and what turns me on and what I'm willing to do with my boyfriend, etc. He also expressed some jealousy about guys I dated and felt rejected when I wasn't responding to his touch as he expected. Most of these touches were unnecessary, other than to "create chemistry," because we weren't with traffickers or in settings trying to fool anyone. It was often while we were alone in a private place.

He frequently asked with bewilderment why I was single. On the first mission, he said that if anything happened to Katherine, he would marry me. On another occasion, almost a year later, he said if he was single, he would marry me. One of the donors with us on a trip mentioned that he had said this about Alonnah (sp? The Ukrainian operator as well. And clearly he said it to -----(name redacted for privacy).

There was no care or training of operators during the missions. Not before, not after. I would arrive home, useless for my kids and family and work until I could process what had just happened. As well, I broke my foot on a training in Budapest and was not able to go on ops for a while after that. So I lost that revenue stream as well as the ability to run my home and business. Being unable to walk was financially devastating. Other times of neglect include when I was left at a large home in Mexico alone with one other woman all night, forgotten by anyone else on the team. She left the next day, and they had still forgotten about me. I was alone and they were going to the airport without me but fortunately stopped back at the house to grab something and were completely surprised I was still there.

On the ops, I was an afterthought. I wasn't often asked for my experiences or perspective on what had happened. It became increasingly clear this was not about putting together strategies to rescue. Our forensics team wasn't passing evidence they found, but we were doing all the fishing on the ground. Tim spent very little time, explaining the missions and the targets and the victims, and an excess amount of time discussing sexual things. He encouraged me to buy very expensive and provocative clothing to play the part.

He became increasingly sexually perverse. At least twice I was afraid when he was on top of me and dry humping on a bed. The first time he then went into the bathroom and masturbated. The second occasion I was scared and unable to tell him as he became more aggressive. He tapped his finger firmly behind my vagina to bring out sexual feelings. He wanted me to go do Tantric massages and other "more intense" practices than we had done previously. He began justifying oral, nudity, and bed sharing. And ultimately, when I refused to do something I felt was criminal, he was demeaning and punishing. I told Coop about it, and he was definitely very concerned. But no repercussions.

I now see so many contradictions between how he protected himself with little concern for me, while creating in me a determination to risk everything to protect him and "us." Interesting that it took him a while to detox from



Brian black mode, but never had the concern that we might need to as well before hitting home and getting back to “real life.”

He’s in danger, but we are not.

He needs to have Hollywood-level help to become disguised, but we don’t.

His family needs help and protection while he’s away, but ours don’t.

He doesn’t need to eat, so why would we? He doesn’t need to sleep, so why would we?

I recently learned to beware of people who are talking about others. They are talking about you too. I have a very good reputation with those who know me personally. And he left in his trail a steady distrust of me among those who otherwise trust me fully.

He greatly facilitated my mindset that compelled me to consider doing what I did. He told me that after we met last year, he remembered me and would have known me if he had seen me at the mall or in any crowd. He meets hundreds of thousands of people, but he would have known me. There was something different. We connected in a way that was so rare for him. Even through high school he never felt connected to anyone and started to wonder what was wrong with him. Katherine was one of the only women he had ever really connected with. It was such an anomaly that he could feel connected to her and so he knew he was supposed to marry her. Likewise, he felt so connected to me as if we had known each other forever and before. Like we had a previous relationship or were soul brother/sister.

## Operations DS participated on

### 2021

Mar 22-27, Maya

Apr 12-17, Maya II

May 25-Jun 8, Cancun/Cozumel/BVI

Jun 19-23, Miami/Cancun/Cozumel

July 5-9, Cancun

### 2022

Feb 16-21, Nueva Luna (Cancun)

Mar 8-14, Media Luna (DR)

May 13-19, Budapest Training

Jul 31-Aug 4, FL Training

Oct 24-30, Maria Chi re-engagement

### 2023

Feb 8-10, Founder’s Maria Chi

I was initially offered \$250/day, a super low operator rate compared with my other services which made it a financial strain to go out for days and weeks at a time. There were many hidden costs of both leaving and being

involved which were not well compensated, especially taking into consideration the time required to prepare before an op and recoup after, the all-day/night schedule away from family and other life essentials/activities/opportunities, let alone the risks of this particular endeavor (which isn't offset on a contract basis like it might be with a long-term or salaried and benefited employee). I finally settled for \$500/day which was still less than my professional day rate (which doesn't demand all-night work, time away, and personal risk let alone require me to be on call for the unpredictable travel schedules and op follow-through missions).

I felt incredibly undervalued with low compensation, long travel times, expectations for random availability, never knowing when we would eat or sleep (we rarely did either), and then zero contact after operations by anyone other than Tim, and that contact was on his terms only.

## SUMMARY OF EVENTS

### March 2021

- In my studio—Tim flirts, tells me he's not a sex addict, DJ tells Tim to "watch it, Romeo."
- Century Bank office—Hair dye/cut and tattoos. Conversations around being waxed, doing whatever is required without hesitancy, how open I am to the work and requirements.
- Mexico City—Sneaking out to the guest house to apply tattoos, Tim begins the "touching"; Feels increasingly connected and asks Janet about our relationship in past lives; asks if I'm embarrassed to leave the door open while I'm applying my bronzer in the bathroom. Tim acts "caught" when DJ comes down the stairs and we're lying on the couch.
- Cancun time in the ocean, discomfort with closeness and pushing back, Coop sees us on the beach holding hands and Tim worries about being caught. Says, "I can't cheat on Katherine!" and I reassure him that will never happen with me.
- Calls me into his room (while he was reading scriptures) and comments about how connected he feels, how he wishes we could stay close at night, how if anything happened to Katherine he would marry me.
- Tim wants to stay in my room, on separate bed. I refuse. He later tells me how he felt rejected.
- DJ takes me to lunch and berates me for my role. I had no idea this wasn't standard procedure and am shocked.
- On flights—recounts stories of deep betrayal (including a previous operator who insisted on kissing him and he was furious so he can't work with her anymore) from those he had worked closely with, how depression and suicidal ideation had overtaken him, how he has a hard time being home. Asks me if I would please pray because he trusts my connection with the Lord. I pray aloud as we put our heads together.
- Comes to my house and can't resist touching me, is saddened when I scoot away from him on the couch.

### April 2021

- Second op, this time I'm brought on as primary team. Tim makes sure we have a house with a hot tub, touches inappropriately specifically intent on trying to turn me on, asking me if I had come.
- Went to a strip club in the evening, spent an hour in a private room with a topless woman who tried to seduce us, he faked oral on me. I had a physical traumatic response when we left the club. Tim still wants to continue hunting, so we entered a brothel where they introduced us to a lineup of prostitutes. He was deciding who we should take back into a room. I was not up for it.
- Asks me constantly how I separate the feelings and can "turn it off" when we're not on the town or specifically playing the role of a sexually-heightened couple.

## May 2021

- Mission in Cancun/Cozumel, planning business venture with Maria Chi.
- Redemption Island in BVI—Tim kisses me on the forehead as an intentional “goodbye to Brian and Lisa” then largely ignores me for the week until Katherine leaves and we’re about to start our fishing mission. He apologizes for his treatment and hopes we can reconnect before going on to the other islands to search for traffickers.

## July 2021

- July 5—woke 5:45 to ready SEG and Tim (hair dyed blue/tats/piercings) and left at 8 in premier black car service for airport, SLC to Cancun. Happy Shuttle to Breathless, they wouldn’t let us in due to improper ID. Barely missed Riigo’s boss, so he paid Riigo 12K USD cash to meet us at another place with his boss, then raced to coco bongo to meet Riigo. Hotels were mostly full, we found and stayed in a Hyatt. Dinner at Mexican buffet, conversations with Sax/Sean, more with Mark Mabry.
- July 6—Hyatt hotel water turned off at midnight to almost 7am, I called for compensation and let checkout. Went to eat at Mercado buffet, then Omar brought us to a safe house. Completed copy editing, had debriefing.
- July 7— woke 10:30 (woohoo!!), visit with Sean/Sax, swim briefly, beach run, copy editing, Zoom with Brian/Tom, Heather Moss itinerary walkthrough, Tim invites me to weekend training in Nashville, OUR filmed interview, out in Cancun—Queens club, Sean trailed by white shirt; paid Nicole for life coaching, paid medical billing,
- July 8—debriefing, Tim tells team he’s backing away from ops, We head to private airport, Chris Frederick greets us and tells us about his plane, then we all fly to Miami for customs and fuel, then on to Sarasota
- July 9—fly from SRQ to ATL to SLC, nap, Heather’s concert

## Oct 2021, OUR TRAINING

- Oct 14—Packing, cleaning OUR training, team meet up, run liberty park, body drag
- Oct 15—1st aid, OSINT, HUMINT, dinner, clubs. Tim is asking about my boyfriend, how far I’ve gone with him, and if now I’m going to be hesitant to be as sexual with Tim.
- Oct 16—CrossFit, asks me to be witness to what happened in hotel room with the trainee who tried to seduce him and get him to “finger fuck” her.
- Oct 17—aftercare training, actors meeting, meet with students in shifts. Talks (with his son Blaine present) about the potential operator who wanted him to “finger f---” her in the hotel room, embarrassingly crude with trainees in mock situation.
- Drove home 10 pm, Alix texted about puppy, grieved until wee hours
- Oct 26—Dr Sundwalll, start Prozac

## Feb log 2022

- Feb 12: Tim texted me about urgent meeting
- Feb 16—Tim arrives 7:30am to dye hair and place tats, black car Uber out at 8:15. Fly to FLL, then drive to Fisher Island yacht dinner with Lexie, Diane, Romero; Airbnb closed so stayed with Lexie in her guest bedroom.
- Feb 17—slept until noon, lunch on beautiful new Italian marble table, ready for Lisa; drive to Miami office, team meet with donors, etc.

## Mar log 2022

- Fisher Island— Insists I meet him at a hot tub. Tells me all about the tantric massage with Jen, which he said she was excited to take back to her marriage. He learned some techniques in tantric and wanted to show me. He said, "I'm going to do something. I promise I won't touch you. Trust me." Then places his finger between my legs, just behind my vagina, and taps firmly 6 times to bring out the sexual chakra or something.

### Mar 12, Sat:

- Oatmeal pancakes; swim in pool, debrief with Brian at safe house, leave for Blue door; meet Jay, quick intros, settle upstairs in large room (4?), drinks by pool, with a live performing saxophonist, where Jay introduced me to his 3 Latino girls and said the Ukrainian and Russian would come that evening. Visited with Jay briefly about property next door that he heard I was interested in. He owns a unit in the apartment adjacent to the lot. I let him know I'm definitely interested, but won't get into details about it until I have a first-hand experience here—I express things like "so far, I love the vibe, privacy, and setup." He told me he has the best chef/staff at which point we discussed the beautiful dinner he had in store...and the fact that this is where my freak flag flies—I'm vegetarian. He assured me it was no problem, they would take good care of me, but needed to let the chef know right away. Dinner inside with girls (3 Latino), Alfredo dish (pink sauce) prepped especially for me. Jay mentioned the other girls would be returning soon; he has just helped arrange for Carolina's mother to escape Ukraine on a night train to Poland.
- Jay introduced me to the two new arrivals: "Let me introduce you to Lisa—she is awesome. Absolutely awesome!" I thanked him with a smile and tease about not knowing who's hearsay he's going on, but he said "Oh, you are—believe me I know." He later told someone I was as authentic as they come, he knows my type well. "Lisa is a baller bitch." I visited for a while with the girls, Carolina (Ukrainian), Lana (Russian) who clarified that they are good friends—they said the government is at war, but they are not. We talked about how it has affected them each, that they are in dismay that that is actually happening in their town, their friends and family send pics of everything that has been destroyed and yet Russia is lying to the people about it. They've even had Russian friends (who believe the "propaganda that the Russian army has been entering Ukraine to give them aid) call them out as liars for spreading false as if their Russian friends know better than those who live there and are documenting it. Carolina's mother almost didn't make it as she went back into her home, refusing to leave the house without her dog. We discussed many ethereal ideas, including that of taking flight in our lives and my many tattoos with wings. Lana showed me her back tat with wings as well.
- More drinks, a surprise show (with three girls whom Jay said come every two weeks to perform with fully revised costumes, choreography, and music).
- Then a summon to Brian to go to bed alone with me. In panties atop stairs with drinks, Nate and some girls saw, offered a warning that we would miss the party. Cassie entertained at the bar.

**Mar 13, Sun:**

- Beach run/workout/coffee, meet Andrew and mini-sermon share faith, breakfast in backyard with Brian/Melissa, dress and leave for Cabernet and safe house, massage places, Covid tests, back to Blue for dinner/drinks/Russian/Ukrainian.
- Massage #1, hair salon front, dead end, don't have what we're looking for. Started our drive to to Sosua, Gabriel said he and Alejandro had stopped at a "coffee" shop that was definitely not serving coffee.
- Brian had him turn around and drive us back to those cafe/massage places. They were closed on Sundays. So we stopped at a different place where we could ask the ladies sitting outside about it. They reiterated that everything was closed today. As we walked back toward the car, we hit the cafe where we met Gregory, the "secretary" to his "boss," the girl Daniella. Her 15-yo "daughter"
- Massage #2, clearly trafficked, available in an hour. Client inside understood the conversation which took place in Spanish, responding in English, "Someone is already in here." We said we would come back.
- Massage #3, seedy place, stole my glasses 🙄
- Evening—returned, Jay said I looked cute and asked about our day. He knew we had gone into Cabernet. I remained vague, we hadn't found clothes for Brian, but did enjoy the streets and getting to see the community. He explained it's a very small, tight community.
- He asked me to sit for a moment at his desk under the stairs, and wanted to talk business. We connected on a few points as I asked about average square footage cost of new build, which he was uncertain about.
- Jason asked me to sit for a minute and talk about it. He told me the owners of the lot are good friends and have assured him they would sell it to someone who would build a single home, not condos or apartments next door (in which Jay owns a bottom corner apt). They would do that to protect him and his business. He also considered purchasing it—I'll delve into details about why he hasn't next time. He had already told me too much that will be inadmissible as evidence.
- Jay told them to hold off the closing, which is supposed to happen end of March/first of April, because he has a potential buyer. They are asking about 900K and a home like his will cost approx 1M, 7 bedrooms, completely finished (roughly \$2M project with lot purchase).
- When he said he was unsure footage price for new build with me that he has an incredible agent/investor who will be glad to take me for a day and show me around. He will talk my ear off (awesome!) but knows the area, movement, and availability better than anyone else. I mentioned I have a real estate attorney checking into some things as well, but might also really appreciate his contact's help. The more perspectives and info the better.
- He also tried to convince me to consider investing in someone (alluding to himself) who already has it figured out rather than trying to start fresh. He knows the sex industry there, has the clientele, has the police in his pocket, and is aware of the places that will not allow the ladies in—the guards are specifically paid not to and there is no way to get them to allow it.
- The musician approached us from the back yard and Jay gave me a quick summation of his accolades. We were introduced and I took that opportunity to excuse myself to change for dinner.
- Jay complimented me on my looks when I came down and walked to the bar. My dinner was an eggplant goulash served outside by the pool. He sat me at the head so I could see the musician, who was Justin James, 2 beautiful kids, one boy around 7; one girl maybe 5, both half Dominican. Justin recently built a music studio in the area, in which he records and hosts many great celebrities. He came from LA, having toured for years with his guitar and songs, performing for us both covers and originals. I asked about which platforms I could find his music on and he replied "Spotify, Apple music, everywhere."

- Dinner conversation points included J explaining how he was Jewish (not Orthodox), had made his wealth, not been appreciated, “so this is my ‘f--- you’ life.” He created a safe place where men (and women) could live out their fantasies and then go home to their real lives. It allows them to avoid the repression of day to day routines and life, keeps everyone healthier and happier. He showed me pics of his two darling girls, with whom he had a wonderful relationship until his ex-wife poisoned it by telling them what he did for a living. He knew she had told them because they called him directly to ask if it was true. They couldn’t accept it so cut ties with him. It is what it is.
- Caroline said her mother and grandmother are so proud of her for making something of herself and providing so well for them. She felt obligated to it since they had no other means. She has a very good life and couldn’t possibly make this much elsewhere. Her family has no idea what work she does. Why? Because they couldn’t accept it.
- We talked about how amazing it is that they get to live on the beach, eating like this every day. Lana agreed that it is a very good life. Unimaginably good. Even the chef is amazing. Every day he makes her a delicious salad and chicken, which is all she’ll eat so she doesn’t get fat. She avoids all desserts.
- For dessert, we were served J’s banana pudding with crumble/caramel that he matched a recipe from New York’s Magnolia bakery (??) Thursday is the grand opening of his dessert cafe that will only serve this pudding. Nate (a bartender) will be going to work there permanently. I believe he said it’s near his El Patron taco stand.
- Both women (Russian and Ukrainian) join us in the bedroom. Tim has been heavily drinking, asks me to do new boundary break of removing my top, asks me to take charge of the time in there (because I’m the “boss”) and asks me to push his head down into me so they believe we’re going to have oral sex. He gets completely naked, he’s sleeping drunk on floor until he climbs into bed (prior to this evening we had insisted on separate beds). This night and the night before was a horribly disgusting situation as I primarily had to fend for Tim and even take the touching and sucking from the other women. I left incredibly vomitous and still want to throw up thinking about it.

## Jul 31-Aug 4, “Training”

- 7/31: Meet in SL at seedy Motel 6 since our flight to JFK (where he planned to “surprise” me (he totally lied about things) with tantric massage before flying to Tampa. Wanted to discuss this “new technique” we could try where he places his dick underneath me and it totally looks like we’re having sex but we’re not, so they’re all completely fooled. Tim becomes desperate to get us into a sexy massage, offering cash up to \$500 for the lady to find us a room so we can experience “Nuru” massage. He tries to get me to get the massage therapist to take off her clothes. I refuse. That seemed criminal to me to ask...right here in SLC to an innocent person. When I talked with him about it after, he was quite upset about being called out. Said she wasn’t innocent, she was willing to give a hand job. He spoke disparagingly about me when Coop picked us up, saying I had “gone soft.” Ignored me most of the remainder of the trip, left me behind at the house rather than taking me to visit Tony Robbins, and took Alena alone to the clubs in the evening (thank heavens I was spared from this!)
- 8/1: early morning check-in to Aloft hotel, Mid-town; dinner with Will Whit at Sacred Pepper
- 8/2: early flight to Miami; taxi to Airbnb at 225 N St West Palm Beach

## Spotlight on Couples Ruse

I was fine with the tactic and the risks associated only because I was brainwashed that **they are needed**. How do you know what's needed unless you're able to have a conversation about that? I believed Tim had been doing this for so many years (and I believed other operators had too, that this was standard procedure) and that it was the essential way to protect everyone involved.

He lied to me about other women, ignored me between ops, demeaned me when I wouldn't go along with his sexual plans. I'm even ok being discarded as long as I can walk away with my head high and not need to be in those circumstances again.

I'm not ok being lied about and disparaged when I have risked so much, and given so much without an ask for appreciation, acknowledgment, money, or concern. And I'm not OK with staying silent when someone else is being lied about, and discouraged publicly. What I didn't know until now was that he was telling other women the same things about me that he told me about them—he told several other women and some of his staff that I had fallen for him, tried to kiss him, and seduced him in bed.

I didn't sign up for this. I'm at risk publicly, compromised and known on ops. I'm alone. My children need a mom. I'm exhausted and can't be present for my family. I burn the candle at both ends trying to provide, now my small business is suffering as OUR has hindered my progress since May of 2022.

No one really knows my story because I don't have just one story, I have a hundred. I'm the most at risk and feel the least protected and the least seen.

**Sept 7, 2023**

**To whom it may concern:**

For several years I have been aware of a relationship between Elder Ballard and Tim Ballard. Initially, I believed they were related—not because of name only but also Tim's social media posts with pics showing his family spending time with Elder Ballard. When I asked, Tim did clarify that they are not direct family but are very close friends.

Tim told me about some of the blessings he had received from Elder Ballard and said they met on a regular basis to discuss OUR proceedings. When I was first asked to go on undercover operations, Tim described the role I would play and shared how he received revelation for the "couple's ruse," which was specifically sanctioned by Elder Ballard as a brilliant way to keep both operators safe.

Under the right circumstances, I thought, going undercover as relationship partners is a fantastic plan to protect both of us from being expected to participate in heinous acts with captive women and children—so it made sense that it would have come from an apostle of the Lord.

I only began to question Tim's claims when he needed constant reassurance that we weren't doing anything wrong. At the time, he was still concerned about compromising the temple covenants made with his wife. I found it extremely odd that he worried so frequently about whether we were acting appropriately and specifically asked me

to confirm that we were in the right to be playing our roles. He worried aloud that he “could not cheat on Katherine.” His concern caused me, as a natural comforter, to engage regularly in this pattern of conversation:

You received the idea of going in as a couple by revelation and immediately knew it as the answer you had been seeking, right? It was confirmed by Elder Ballard, right? And by going undercover as partners we’re protecting each other’s chastity as well as preventing those we engage with from having to perform sexual acts, right? Your wife was just as enthusiastic about this ingenious way to protect you, right? We were carefully selected to save lives in a very unique way that God has trusted us to do, right? So it’s a righteous cause and calling that came directly from heaven, right? Then we have no reason to be concerned. We can remain in the peace and faith that we have been and will be guided by the Lord.”

My eyes are now opened to the real reason for Tim’s concern—he was behaving with impure intent. He therefore used me to comfort him and regularly reaffirm the righteousness of our roles and behavior. Doing so kept me lodged in a belief that God condoned anything we needed to do to gain the trust of human traffickers and other dangerous or evil people while keeping ourselves safe physically and spiritually. While I see how all that could be true at times, and scripturally/spiritually justified, I don’t believe it is in Tim’s case. During the past couple of years I have witnessed first-hand his degeneration into moral decay, mental illness, and harm to himself and countless others.

## **DS’s Statement to the board of OUR 6/6/2023**

We have intentionally and cautiously acted in integrity to protect the organization and Tim’s personal reputation (as the face of OUR) at all cost and plead with you to do the same. We are extremely concerned about Tim’s behavior and the repercussions to the organization if it is not addressed quickly and boldly. We are direct witnesses that Tim is mentally unwell and unsafe.

Allowing Tim to resign without assuming full accountability cripples the effort and intent of anyone sincere about OUR’s mission to protect those who have been harmed and silenced in the hands of predatory, lucrative, dangerous men. At the same time, in the interest of all affected, we request every legal protection to maintain silence to the press and public regarding the specifics of his behavior and names of women abused, especially given the dangerous and covert nature of our work.

To maintain the integrity of the organization as a whole, we call upon you to

- clearly place accountability where it belongs—squarely on Tim’s shoulders so he’s no longer sheltered by insidious justifications or able to disparage his victims, and
- distinctly separate Tim, both formally and informally, from all further affiliation and compensation from OUR.

Many company leaders and employees are already aware of and infuriated by Tim’s destructive behavior, which is more extensive than has likely been considered, and believe he should be held to the same level of accountability which OUR purports to demand of predators worldwide. He is an ironic contradiction to OUR’s mission to protect victims and hold offenders accountable, impacting many who have said they will refuse to work for or donate to the organization if Tim is given an honorable or luxurious sendoff (adding insult to injury) rather than a demand for retribution.



Appearing to turn a blind eye to the seriousness of Tim's conduct will ultimately be more damaging to the organization than dedication to quick accountability and proof that the mission and values are upheld regardless of status, influence, or fear tactics. To deserve donor funding, OUR should be stronger than the whims of a single individual, founder or otherwise.

With careful measures and dialogue, OUR can proudly hold true to its mission to fight evil at every level, even purging within from top down, and come out with honor.

## EXHIBIT C

Statement by D.M.

In October of 2021, I went to lunch with my friend who was involved with OUR. In the midst of her conversation I had brought up that I was interested in saving women and children who were victims of violence or sex trafficking. At this time I did not know that she was involved with OUR. She told me she may have an opportunity for me to get involved with the organization. We chatted a little bit more and she told me that she would reach out to her contact in the organization. At this point, I did not know who this person was or anything about the organization. A couple weeks went by and I was contacted by Coop, a.k.a. Matthew Cooper. He is a male operator at OUR who works very closely with Tim. He had told me that they were doing some training, but that they would not be starting a new training course for a while. He asked if I would be interested in being an actress for the other operators to practice scenarios with. I told him that I would rather be more directly involved and actually be the one to go out and save women and children. That was about all our phone call consisted of. He told me he would be in contact with me at some point in the future. A couple of weeks went by and he reached out again. He asked me if I would be willing to come up to the OUR gym and do a training session. I told him yes, absolutely. On October 28th 2021 I went up to the OUR gym. (13648 S 200 W Draper Utah 84020)

When I got to the gym, Coop a.k.a. Matthew Cooper was waiting for me inside. There were a few other women there as well and a girl named (redacted). We did some basic training exercises involving Self Defense and then covered some awareness tactics. After a certain point, Tim arrived at the gym and I spoke with him one on one in a back room. When we spoke, he told me briefly about what the organization did and how I could potentially become involved. I expressed to him very clearly my interest in becoming an operator. He told me that it was a hard job and I would have to be willing to do a lot of really potentially dangerous things, that I would see a lot of dark things as well as be in some very seedy and gross places. He touched briefly on the Couples Ruse as well and asked if that was something I would be able to do. I told him that I was an actress and that I thought I could be quite good at being an operator. I then went back out after speaking with him for a bit longer. I continued doing some training with Coop and the other two girls that were at the gym. Tim's son Blaine was also there doing some training with us. After the self defense tactics, Tim said that he thought we should continue training in a different way later that evening. That we would now take it up a level.

They wanted to essentially test how well we would respond to certain uncomfortable or intense situations. He told us about using an app called Signal to communicate and how we had to be very careful with text messages and that we could not talk to anyone about this stuff ever. I signed an NDA as asked and left it there at the gym. (I never received any type of copy of this.)

We were told to meet later that night back at the gym. I believe it was around 10:30 PM that I arrived there. Coop, (redacted), Tim and I were all supposed to go out as first team. First team meant that we would be the ones to go inside the strip clubs and try to gather information from people as a part of our training. There were two other men that I recall being there that night. They were on second team that night. Second teams job

was to maintain communications and follow us around discreetly in a vehicle of their own. One of them was Tim's son, Blaine. The other was an older gentleman (I do not remember his name).

Tim and (redacted) were partners that night and met up at her apartment. They were supposed to take an Uber to meet us at the OUR gym after getting in "character" together. They missed their first Uber and we were waiting around for a while (I think we ended up having to just meet them at the first strip club.) When at the clubs on our training OP we were supposed to pretend like we did not know them. Second team was supposed to just follow us around and keep in contact via messages on the Signal app.

We all had to constantly remain in character, even while interacting on the app. Tim and (redacted) were partners for the couples ruse training that night and Coop, (redacted) and I were a "throuple" for the couples ruse. While waiting to head out and start our training, at one point Tim's son came over to talk with us. He made a comment about how his dad had given him something to take (presumably some type of pill, but I'm unsure of what).

He then said he felt high and was kind of laughing about it like it was no big deal. It really concerned me though. I didn't like that we were supposed to be pretending this was a real life scenario and that he would be out of it. If it was a real situation potentially out of the country, where lives depended on it, then I would be so anxious and scared. I would never be able to trust someone not in their right state of mind. Not to mention it disturbed me and was inappropriate that his dad had given it to him. At some point- (I don't remember exactly when) Tim told me that he would sometimes take something in order to deal with his stress and to help him get into character, as well as loosen up.

I drove with Coop to the strip clubs in Salt Lake City for this training. (I don't remember the names of all of the clubs and bars, or the order, but I know we went to these clubs for sure: Trails Gentlemen's Club, Exotic Kitty Gentlemen's Club, The American Bush).

We Coop, (redacted) and myself got there and went inside and sat down. I got an energy drink from the bar and we all sat in a booth together. I saw Tim and (redacted) at the first strip club. (Redacted) was sitting on Tim's lap and they were all over each other playing the part. Tim was in character as "Brian" and wore these big glasses to disguise himself. (Brian is his alter ego of sorts).

The idea behind going to the strip club was for Coop & Tim to see how well I could get information out of people and how I would respond to being in a "darker environment" around certain types of people. He would point out people in the club and tell me to go try and either get their phone number, find out where they lived or a variety of other questions. I don't remember how many strip clubs and bars we went to exactly, but I think we went to three strip clubs, as well as a regular bar at the beginning and then another bar at the end. No alcohol was consumed by anyone that I saw in my "throuple." While at these clubs and bars, Coop, (redacted) and I would hold hands, sit next to each other and just generally pretend to be a couple.

Nothing overtly inappropriate ever happened while I was training with Coop. I felt like he was in character while still keeping things professional for the most part. (If that had been what Tim had wanted for the couples ruse, it wouldn't have bothered me as much. His version was not that unfortunately.)

During all of this, I occasionally saw Tim and (redacted). They acted out the Couples Ruse as well- Just more extreme (lap sitting, going into private rooms in the back etc, dances etc.) At the last club we went to, (redacted) and Tim were in the back by themselves in a private room.

Tim had asked (redacted) to give him a lap dance. She was supposed to show him that she could do the job- so even though she was hesitant, she did it in order to prove herself. She started giving him a lap dance, but shortly after she started, Tim's son ended up coming inside. He walked into the club's back room and saw Tim and (redacted) together like that. It made me extremely upset because she had not wanted to do it in the first place and had been reassured multiple times that he would not be coming inside or see them acting out the Couples Ruse. She was freaking out a bit and came and told me what had happened. At this point, Tim came out from the back room and talked to me in the club. He had his arms around me and we were chest to chest. We were talking more about the Couples Ruse and what that would involve, as well as some other things like how his wife was going to kill him if she found out their son (Blaine) had come into the strip club. I cannot remember exactly what else was said at that moment. Shortly after that we went to one last bar Tim and (redacted) did not meet us there. After that last place we decided to call it a night.

I drove with Coop and (redacted) back to the OUR gym where we met up with Tim and (redacted). At this point I think it was coming up on 4:00 am. Tim told me I did a good job, then talked to us all about the night and how that experience only scratched the surface of what it would actually be like on OPS.

Tim texted me the next day, October 29th and said I was badass and had done an awesome job the night before. He then asked me to come and meet him at the OUR American Fork office. (758 S Automall Dr Unit 5 American Fork, Utah) and I told him that I would. On November 1st, 2021 I went up to the address he sent me. When I arrived Tim and Matthew Cooper were both there. Tim asked me to come up to his office to speak with him privately. When we sat down, he started talking to me about the Couples Ruse and how important it was; telling me exactly how intimate certain scenarios would be. He asked me over and over if I would be willing to act out certain sexual acts, continually getting more explicit. Doing all of this, he made it clear that I could not tell anyone about the things that were happening between us. He made it seem like it could be a life or death situation if I disclosed information and/or that I would get into trouble as well. He also made it seem like it could be a life or death situation if I was not willing or able to act out certain sex acts well enough.

This is when he started pushing the idea of needing to practice with each other. He started telling me about other operators and how they had been in situations where they had to be completely naked in the rooms in front of each other and while getting massages. He told

me that the point of the Couples Ruse was for you to be able to block for each other. Meaning that on OPS you would intercept sexual touches from traffickers or sex workers. He started to become explicit with the situation's that had happened or that could happen. He told me that he wanted to train me to be his new primary partner on OPS. I would be paid for my time as a contractor with the organization. He said that operators before me had fallen in love with him. That some had tried to climb into his bed at the safe house and that they had pushed for relationships with him. He told me that other partners before me had gone a bit crazy and he had to end things. I knew he was married and he said because of that he had one rule for the couples ruse, which was no kissing on the lips. He made it seem that everything else besides maybe full on penetrative sex would potentially be expected. During all of this, I felt like everything was a test. Every question or action was proving myself. I had briefly gotten into my personal background with him and explained why helping on operations as an operator was so important to me. Saving women and children truly meant so much to me as a person on a personal level. I wanted to make a difference, I have been a long time supporter of OUR and knew that's what I wanted my future to involve. Tim then asked me some personal questions about my life like: if I was married, if I had my own place, and others, things of that nature.

Tim then became more open about things that could happen or that I could expect on OPS and that I would have to be willing to do those things in order to save children. This included being naked in front of each other, touching each other, imitating sex acts, talking dirty to each other and all sorts of things of that nature. It was presented to me as "if we were in a life or death situation, would you be willing to do XYZ...?" And of course if it came down to saving women and children I would be willing to do it. If it was a life or death situation, I would be willing to do whatever I had to do. For him, he said if he was going to get a new partner, he needed to be able to practice. He would say that it was really important for us to have intense chemistry. He wanted to know if I was attracted to him and wanted to make sure that he would be able to turn me on. I was really uncomfortable with these questions obviously, but at that time in my mind I felt like it was a test. And I didn't want to fail this test. I wanted to become a part of the team.

Things then proceeded to become physical. It started out with him just resting his hand on my knee, then he started running his hands across and up my legs. He slowly started to become more comfortable and was running his hands all the way up my thighs. We were sitting in chairs facing each other at this point and were no longer talking. I was pretty shocked he was touching me so intimately. I guess in my mind I hadn't thought that he would begin practicing then. I guess I had assumed that he wouldn't need or want to practice until at least we were heading on an operation. He moved closer to me and started to run his hands along other parts of my body.

I remember there was a lot of touching, rubbing and grabbing with his hands across pretty much my entire body. At this point I remember then being pushed up against the office door. He was up against me and he was sort of grinding his body against mine. It was obvious that he had an erection. At one point his thigh was kind of pressed in between my legs and kind of moving up and down against me. There was no kissing on the lips seeing as that was his rule, but there was lots of kissing and mouthing movement around my

shoulders and neck and other parts of my body. At this point I was very uncomfortable, but again I felt like I could not fail this test. I needed to prove that I could handle what he was doing. If I was not strong enough to handle this and deal with this, then I would not be able to go out and rescue women and children. And that was not an option for me. I wanted so badly to be able to be part of this organization, but still I was so unbelievably uncomfortable. I didn't understand why we had to be practicing right then. I mean we weren't on an OP. He had only met me one other time before this and it hadn't made sense to me that he felt like we needed this practice now. Things were moving so quickly physically and I hadn't done any other sort of training. It was all happening really fast. He then slowly worked his way down my body until he was kind of kneeling down in front of me and was pulling at my jeans a bit. He then lifted up my shirt and was licking and kissing my stomach and getting lower on my body, still tugging at my jeans as if gauging my reaction. At this point, the door was pushed open from the outside and he had to back up away from me. Coop pushed open the door and came inside and was just looking at us both. Tim kind of just played it off casually. I did not know what to say or do. I felt like Coop knew exactly what was going on; I could just see it on his face. It seemed like he was unhappy with the situation he'd walked in on. He didn't say anything or ask any questions though. Coop wanted to speak to Tim then I believe and Tim told him that we would be coming downstairs soon. Coop gave us another look and then left and shut the door behind him. We talked for a minute longer and Tim tried to start things physically again, but I had to leave for an appointment and I used that as an excuse to leave. Tim then began to question me about how I had felt about things. He wanted to know if I had been turned on during that or if I was still turned on and worked up. He wanted to know if I was attracted to him physically as well and if he was good looking. I didn't quite know how to answer those questions so I told him something along the lines of: Yeah you're a handsome man. It all felt like a test to me so I tried to say what he wanted to hear and react the right way. I kept thinking about how he had a government background and that they had probably taught him these techniques and that I should trust him. He told me he was really attracted to me

He told me that he wanted to have me do more training. And that the next training would be even more intense. He asked if I had a couple days available, possibly in November, to go and do a training weekend with him. He didn't specify if other operators would be going as well. He told me he wanted me to start coming on OPS with him soon. He then made it clear that he would want and need to practice more physical things like we had just done. I told him that I was an actress and I did this for a profession, so practicing wasn't necessarily needed on my part. I tried to say these things delicately as I did not want to offend him and jeopardize my chances of becoming an operator. He told me that practicing was fun. And that it helped keep your relationships more exciting. He said in order for this (the couples ruse and operations) to be sustainable, it has to be fun. I immediately felt sick to my stomach, dirty, and panicked. I had been warned that I couldn't talk to people about things that had happened. I had signed an NDA and I was really anxious about breaking it. I also didn't want to lose my opportunity to work on Operations. I called my friend (REDACTED) and told her I was really nervous to speak with her but I felt like I needed to tell her something. I felt safer talking to her, because Tim knew she had been the one to get me involved with him and the organization and hadn't minded me asking her certain questions before. She was the only person he seemed okay with me communicating with

about certain things.

I knew he would not want me telling her what had just happened between us though. It was supposed to be too secret between us (Tim and myself). I told her I was scared to talk about it over the phone and she told me that I could come and stop by her house later that evening. Over the phone though I did very briefly tell her a few things that had happened in the office with Tim. She seemed pretty shocked and did not think that what had happened was normal or good, but I did not tell her a whole lot because I was really worried at the idea of getting in trouble or messing anything up. She reassured me that it was okay to stand firm about not wanting to perform any more sexual acts with him, even for the sake of practicing for an OP. I knew my talent as an actress and knew I didn't need to. I went to my appointment and Tim messaged me asking when I was coming back. I told him I wasn't sure if I would be able to. He asked again if I would be coming back that night or not. I told him that I would if I could. After my appointment, I went back up to the OUR office. At that point I was resolved on telling him that I would not want or need to practice any more sexual acts with him. I went back and when I got there, Coop wanted to speak with me. So we sat down in the office and he asked me some questions about the night before when we had gone to the strip once and about how I was feeling about things. I wanted to be honest with him so I was. I told him that I was worried about Tim a bit. I didn't get into any details because I knew that he was friends with Tim and I was worried about him not being happy with what I said or it jeopardizing my role in the organization. I did tell him that I felt like Tim needed some help. I told him I felt like Tim had seen a lot of things that were probably messing with his mental state a bit. I told him that I felt like Tim, as well as the other operators, needed to talk to someone. That they needed to see to a therapist and work through some of these issues. I was really worried for Tim's mental state at that point because of the pills, the way he was acting, the things I had heard and the sexual situation that had happened already without us even being out an OP. Coop did not necessarily disagree with me, but he also didn't agree with me. I then met with Tim again privately and he started with wanting to practice some more. And saying basically that in the near future we needed to keep practicing consistently in order to be a secure team together.

I didn't want to make him too upset or offend him, but at this point, I just genuinely wanted him to seek some help for his mental health sake. I told him that I was worried about the things he had seen as an operator and hoped he had someone to talk to. I told him that I was worried that OPS and the things he had been exposed to were negatively impacting his mental health. I told him that for the sake of his wife Kathrine, that I didn't think it was right to practice like that. I told him that us practicing sexual acts was not necessary. I reiterated that as an actress, it was not needed, that I can turn it off and on as needed for the sake of the situation we were in at any given moment. That's what an actress does with all emotions or actions in scenes. He asked at some point something about if I had my own apartment and that going there would be an easier place to get more comfortable with each other. I don't remember at what point in these conversations that was. At the time since I was going through a divorce, I was living with my family and did not have my own place which I let him know. I don't remember exactly all the things we continued to talk about... But I think it was pretty much the same as earlier. We then were done.

I don't remember the exact timing here, but at some point Coop talked to Tim and Coop told him what I had said about him potentially seeing a therapist or seeking mental health. Tim then confronted me and said "Oh I heard you think I'm crazy? I heard you told Coop that I am losing my mind... that I am completely crazy" something along those lines. I told him no I didn't say I think you are crazy... I just think that seeking therapy for some of the things you have seen should be a priority for not only you, but your entire team.

I then threw out some ideas about how to better protect people on OPS. I found out that no one is allowed to carry any type of weapon on them and that no one has any tracking devices in their phone or on their persons. I told them my opinion was that for the sake of the safety of their operators, especially the female ones that could potentially then be trafficked, that it was important for them to seek some better safety methods. Up until this point in my conversations with Tim, I had not even really been spoken too much about safety tactics on OPS. Really almost all of what Tim spoke to me about the whole time I was there, was the couples ruse, sexual acts and all the things I would need to be prepared and willing to do with him. As I was getting ready to leave, they made it seem like they would be in contact in the next couple of days to continue training. I told him that I would be going out of town, but that we could plan something after that. I was prepared to keep working with him and be his new partner on OPS if he would stop pushing the sexual practicing aspect and get some professional help. I still wanted this working relationship to work out so that I could make a difference in this world by saving kids.

I then left and called and asked (redacted) if I could stop by her house and speak with her. When I stopped by her house, I told her all the things that had happened and asked her to please not tell anyone that I had told her. I was and still am very much nervous. She reassured me that the things that had happened she did not think were okay and that I needed to stand my ground with him about no longer practicing the couples ruse unless we were actively on an OP and it was necessary. I then left her house and went home. I reached out to Tim about when we would be able to meet up next when I was back in town. I was then invited to go to the OUR gala and I told him that I would not be able to go. The last I heard from Tim and Coop was on November 11th 2021. Tim told me he had talked to his family and team and would no longer be going on OPS. (This is something he said to the other women as well after they stood up to him in some way or another) When he realized he couldn't control or manipulate me any further sexually, he no longer wanted me as his "partner."

Coop called me and told me he would be back in the country soon and would keep training me. A couple weeks went by and I still hadn't heard from them about coming back to do more training and go on an OP like planned. I reached out a few times to just Coop and finally he called my back. He made excuses for why he hadn't started my training again, but promised he would reach out in a few weeks. He never did- I tried to reach out once more and got no reply. At this point I realized they had both shut me out. I can't even tell you how disappointed I was. I wanted to make a difference so bad. I had put so much hope into this new future. I had anticipated being paid for this new venture,



but more than that I would have been able to impact a positive change. To have that taken away because I didn't want to "practice" sexual things and keep being physical with Tim hurt.

## **EXHIBIT D**

### **STATEMENT OF MK**

I've known Tim for a few years working as a make-up artist on multiple production sets. It took a different turn one year ago while we were on set (for OUR), when I was asked to potentially go on a mission with O.U.R. Tim was very persistent in having me on his team and I was excited to learn more about what a mission entailed. I asked if it was a paid job and he said I would be compensated and paid to go. After giving him my number, and exchanging multiple text messages, I decided to meet with him and he took me into a private room where the door was locked behind me.

It was a bit sketchy but I went along with it because it seemed like an interview at first - then he sat down across from me and said I needed to prove that we had a strong enough connection in order to be believable and potentially hired as his "girlfriend" for the mission coming up. (Which would be about 2 months later) so I wasn't sure what to do. He stared at me and said you can't touch me but need to show me what you can do to basically "turn me on enough" that he would want to have sex with me.

Then we were interrupted and his bodyguard said he had to leave. Tim and I got close in proximity a few times but I felt very confused about what the meeting was about or what exactly he needed to do. He was evasive with explaining and wanted me to do the work and come up with the ideas in the room to connect with him. After about 45 minutes in his office and talking about everything in detail, he made me feel like I passed the test, but I didn't know what it meant going forward. I wanted to support the cause so I signed an NDA before entering the private room and there was a lot of talk and anticipation about different scenarios that could potentially happen if I was on a mission with him. I left and waited to hear from him again.

In his text messages to me he was persistent and aggressive and very forward with me being involved. He wanted me on board and to say yes to being okay with the following scenarios.

Including:

1. If we were in a hot tub together- he would have to touch me under the water so they would believe we were into each other. Which meant under my swimsuit.
2. Potentially we would have to shower together
3. I would have to have an orgasm if needed for them to hear it or fake it.
4. I would have to turn him on enough that he'd want to have sex with me when we got back to the hotel.
5. I'd be his GF the entire trip including in the airport and back. That people had to believe us the entire time that we were together.

We met on multiple occasions and he would ask if I could get together or see him after but fortunately I always had early morning call times and usually couldn't go along with him. The man he talked me into meeting at the hotel with other OUR members for the official training. But when I asked what to attend when I arrived, I didn't end up being training at all- it was more club scenes and practice sessions and I'm not sure what else went on because it was very private.

I was told I'd be paid that weekend but never got any compensation from OUR- and I met Tim at my hotel room upon his request where I did another audition to see if I was eligible. So this time he said to show me what I was willing to do or how far I was willing to go without physical contact. So, I felt required to turn him on or give him a show by taking my clothes off (into my underwear) and he told me to say "F#%\* me" as I looked in his eyes. He watched me on the chair and I felt very uncomfortable. I've never said that word out loud before but he said it was necessary.

After a long while and with his arms around me he said he was too turned on and that we should go to the gym together. I declined. I never saw him again and he later told me he couldn't do missions any more because he was too well known. That's when it was confirmed to me that I had been used and played. It was all for his enjoyment. While I was in the middle of so much with work as a makeup artist and barely even keeping up with my insanely busy schedule, Tim decided to try to convince me to come with him on a mission but instead there was no mission.

I was disappointed that I was treated like an object and even more upset that it was all for his entertainment and pleasure. For a year, I sat in silence knowing my story wouldn't matter. But now maybe it will make a difference. After getting to the hotel at midnight, I was asked to sign another NDA and was told we would go clubbing that night as prep for the mission. He stayed in my room for about an hour and I declined because I was much too tired. He stayed in my hotel room and asked me multiple times if I was recording him and if I was excited to be a part of this. I was in my pajamas and didn't understand what was going on or why he was asking so many questions at 1 in the morning. He said this was all private and nobody could hear about anything or it would be used against me.

I was told the next day to go to training but there wasn't any training to go to. I basically left feeling depleted and used and completely confused. I was willing to go until I realized the truth about his "project". I felt devalued after that day. He basically told me in a few texts that he didn't need me anymore but if I still wanted to go on a mission I could reach out to someone else. I didn't give him what he "wanted". Other facts: Tim asked me to tattoo him up and go to a strip club with him. I declined. We met on multiple occasions and made me feel important by telling me I was perfect for the job. He was polite and would open my door and give me compliments.

He would often check on me because I was so busy and even sick and working so much. I rarely had time to message him back because I was double and triple booked on other projects. He sent links and kept inquiring about the mission for me to be on board with him. He made it all sound very exciting. After all the meetings and time taken out of my schedule, I was thrown away like a piece of trash. I've been attending therapy this past year to understand the situation and regain my confidence and feel safe. It has been very hard for me to wrap my head around what happened to me when I trusted someone like Tim, who talked about saving innocent lives, when in reality I felt he was taking advantage of me, and had

other intentions for me. I was also disappointed with the OUR foundation and how they didn't do anything to stop him.

## Exhibit E

### STATEMENT OF HDT

I was introduced to Tim Ballard by my friend/client C.L. She is, I believe, a part owner in a local business establishment. She was pre-screening the movie, *The Sound of Freedom* for OUR and Tim Ballard. One day when I was doing her hair, she told me about this amazing organization that helps save women and children from sex traffickers.

She proceeded to tell me stories about how awful the world of sex trafficking is, and what this organization was doing to help save the children around the world. C.L. was doing the scheduling for these premieres. She asked me if I wanted to go to one of the pre-screenings. I said Yes, that sounds awesome.

She gave me some dates and I chose one. After the movie, Tim was there answering some questions. I told C.L. that if he really was a famous guy, then he needed a new hairstyle. When she ran into him she told him that she had a great hairstylist. I think you should try her out. He had his assistant reach out to me.

I went to a house in Saratoga Springs. It was on October 24, 2021. Apparently, Tim was doing some sort of therapy that he had to do for three days in a row. He was on his third day, and he had to be away from his family and friends. Only Katherine, his wife, could be there. He couldn't have his phone or anything until the end of the three days, which would have been that night. So I had been communicating with his assistant and Dimitri, who was his bodyguard, about a time and place where to meet, so that I could cut and color Tim's hair.

When I showed up to the house in Saratoga Springs (which was not his house—I guess it was just a house where he was doing this therapy), his wife Katherine opened the door. She let me in, and Tim was coming down the stairs. He looked like he just woke up. He and Katherine were talking about what they wanted to do to his hair. He was saying that he wanted to have a more edgier look. She did not want that—she didn't want him to color his hair more blonde, which is what he wanted.

They couldn't really agree, so she just said, do whatever you want and left, and told me that his assistant would be there soon. When she left, he began to tell me that Katherine doesn't like his hair light because it reminds her of when he would be on operations and it made her uncomfortable and she did not like that. So we kind of talked about how there are different levels of light colors that he could have, and maybe in the past it looked like a beach boy blonde, so we could do more of a natural blonde and maybe she would like that better.

So we agreed and I started cutting his hair first. We did that, then as I started applying the lightener, Tim started asking me questions. He asked what I knew about OUR, and I said I didn't know much except for what C.L. had told me, and that his movie was out. He seemed very shocked and almost disappointed that I knew nothing about his company or him for that matter. He asked what I did know about him or if I had even heard his name with the LDS church, and again I said no. He replied with, "I'm actually a big deal." I said, Oh ya, tell me why?

That is when he started to tell me that he had written quite a few books on the New and Everlasting covenant. He said that he is good friends with many apostles, including Elder Ballard, and that he knows President Trump personally. He started telling me a lot more about

what OUR does. He asked me how I felt about it. I told him I was very impressed, that it's a very noble cause, and I really admired him and what he was doing.

He then asked if I ever wanted to be involved in a cause like that, and I said of course. He asked what position I would like to be involved in, and I said, I don't know, I've never thought about it, but it sounds amazing. He then asked me how I would feel about going on an operation with him. And I asked him what he meant. That's when he started telling me about a couple's ruse. Tim said that the way they had been getting intel on ops had worked for awhile, but it wasn't working anymore so they had started realizing what was happening and that they needed a new tactic.

Tim said he had been praying about it and he came up with the couple's ruse, and that it had been sanctioned by Elder Ballard and that God told him to do it. He said it was a difficult job. We had to act like a couple, we had to be very sexual with one another. But it was all for the benefit of saving the children. He said that God knew our hearts and our souls and what we were wanting to accomplish, which was to only help the children. He asked me how I felt about it and if I thought I could do anything like that. I felt special that he was asking me. I felt important to be asked to do such amazing, important work. I said of course I would want to do that.

He then began to tell me that his last operator who was his partner had fallen in love with him. And before any lines were ever crossed, she had told him and decided to quit. He said he was about to do interviews with about 20 different women to be his new partner, but if I was willing to train for a little bit and see if it worked out, he would like me to be his new partner. He said he already felt very comfortable with me. I told him Yes, that sounds amazing. He asked when he could meet with me so I could sign an NDA. I said, anytime let's figure it out. And he said, How about tonight? I said okay.

At that point I had told him that I was a single mom. He knew that I had my kids that weekend. He asked if he could come over with one of his partners after my kids went to bed and I could sign an NDA, because he probably shouldn't have told me any of that before having me sign anything. I said absolutely. He asked me if I wanted to go to one of the showings of his movie premiere that was the next Monday morning and I said yes. He ended up wanting me to tone his hair a little darker. Katherine still thought it was a little bit too light. So we were trying to figure out a time when we could tone it a little darker as well.

We decided to sign the contract not that night – we would do it when we fixed his hair. C.L. was actually going to train as an operator as well. She and Matt Cooper were going to be partners. C.L. and Matt were going to come over to my home and C.L. and I were going to sign our NDA's. That night we were all going to talk and run some scenarios and Tim and Matt would explain some more in detail what it would be like on operations.

We talked about how we would have to start training one on one hanging out so we could get really comfortable with each other and we could know how each other works. Even get to know our normal personalities. like, if we were sitting down me putting my leg over his leg, things like, holding hands. Really getting to know each other on a personal level so that we could trust one another. Tim talked a lot about how we needed to trust each other. He said we would be put in dangerous situations. The more we really knew how each other worked, that if we had to save one another we could trust that would happen.

He starts slowly touching my hand, slowly touching my leg, slowly rubbing my back and I just keep going along with it because that's what "we're supposed to do". We're supposed to get really really comfortable with each other, especially physically. C.L., Matt, Tim and I hung out for a little bit and C.L. and I signed the contracts and they left. Tim and I continued texting every

day, just still getting to know each other by talking on the phone. He asks me if I want to go to a gala that is coming up for his company. And I said yes. So he got C.L. and I tickets to that. And at this point, we've only seen each other those two times but we have been talking and we are planning to get together with Matt Cooper and C.L. again at my house one night when I don't have kids just so we can all kind of hang out and talk and get more comfortable with each other.

We were planning on doing that before that gala and so what happened was, we got together. Me, C.L., Matt, and Tim. We are hanging out we actually played like some games and we're trying to all act like couples. It was very strange, but that's, quote unquote what you're supposed to be doing. Tim's starts kissing my neck and my forehead, grabbing my butt. He kept telling me like this is what we have to do so that we are comfortable with one another. Matt Cooper's not doing this to C.L They would touch each other's backs and she had her leg over his but that was the extent. I asked why they weren't being so handsy? He said we would be the ones who were really communicating with the traffickers. We're the ones who are really in there. And so you know, he is Tim Ballard. I'm trusting him.

I know that sounds crazy, but at this point, even my mom is telling me Tim is so amazing. She has all of his books at her house. She's read all of them. He's just this incredible guy. Anytime you mention his name, everybody just talks about how great he is. And so I just trusted this process. Well, C.L., and Matt and Tim and I are sitting there and they start talking about how we need to do self-defense training. And we also need to do a training where we go on fake ops. What we will be doing is we will be going to some bars and or strip clubs and we say okay, that's all we really talk about at that point. C.L. needed to go so we kind of set a date for that and then we very quickly moved on because she had to leave.

Tim then asks Matt, if he would go hang out in another room so he and I can just like get more comfortable. And talk more one on one and talk just more about our lives and get a little more personal? Yes, I did think it was a little strange but Matt Cooper didn't think it was weird. And therefore again, "I am trusting this process". We sit on my couch, he pulls me in really close, he starts rubbing my arms and he puts his face in my neck. Started kissing my neck, pulled down my shirt on my shoulder and started kissing my shoulder and I said, Wait, wait, aren't we supposed to just be talking and getting to know each other more personally? And he said, Yeah, this is what we're doing. Why don't you talk? And so I start asking him questions. I think because I felt so uncomfortable that he was being physical.

I started asking him about his wife, Katherine. I asked him, what does she know about this? And he said, not much. I asked him, " What do you mean," and he said "not much" and that she didn't want to know. I was a little bit shocked. I said, What do you mean she doesn't want to know? He said she doesn't want to know the details. She trusts me. She knows that this is a calling from God. She knows that this is what needs to happen. And she knows that I'm the man for the job.

I asked if she trusts you, then why does she not want to know what is going on? He said well, she knows to a point. She doesn't want to know details about the things that I have to do with the women. And she doesn't want to know about the gross things that we have to say with the sex traffickers, and do with my partners. Which brought me into more questions. So I started asking him well, what do you have to do with your other partners? He proceeds to tell me that he has had to shower naked with them. He has been in massages before where they have had to grind naked and act like they are having sex. He has had to pretend that he is fingering someone while they were at a bar. He has had to have somebody rub him over his pants on his genital areas.

Things like that. And I was a little bit shocked. And he kept just saying to me, do you now see what I'm saying? This is a very, very hard job. But it really is a calling from God because somebody has to do it and if somebody has to do it, I know that I can do it and have the spirit with me while I do it. And I said I'm not sure if I can do that. That seems very hard for me. He said you will. Once you understand and you see the good and the kids you will get there. He told me that a line has never been crossed with him and a partner before and that I can feel safe with him. He then begins to tell me the first time I met Tim and Katherine that later she told him that she had a strong feeling I should be his partner. So once again I was feeling very uneasy. But also thinking in my mind that this situation is a very uneasy situation but that "I'm going to trust this process." At this point, Matt comes downstairs and Tim gives me a hug and they leave. In the meantime, we kept texting. He wanted us to build a narrative of what we would say our relationship was when we were undercover. He just kept saying we need to build our legacy, what's our story? He wanted to make sure we were talking or texting so that we could stay close and he could answer any questions I had no matter how awkward it may seem.

We had planned to do an op training for October 28. That was a Thursday I believe, and we were going to do the self-defense training in the morning. That night, we were going to do the op training. He wanted to come over one more time before that training. He wanted me to practice putting on tattoos for him, to talk about outfits, and what kind of roles we want to play together as a couple. He wanted to look up outfits that we would want to wear as a couple. He kept talking about how I need to dress slutty. He said We can look up outfits for you and told me multiple times that I need to hurry, and pretend to fall in love with him. He would tease me about how he thought it was funny how embarrassed I would get when he would touch me or do anything physical.

So Tim and Matt come over the night before the train exercise. They just kind of hung out. I honestly was not quite sure if this is how the hang out was supposed to go. They just kept saying that they loved hanging out with me. And if I'm being honest I enjoyed hanging out with them. It felt like I was a part of a cause that was really changing people. They told me lots of stories about operations they had been on. It was great to hear. I felt a part of something that was amazing. Every once in a while Tim would come over and sit by me.

He would whisper in my ear, why aren't you kissing my neck? Don't you want do that? I would sort of laugh and play it off as if it was a joke. Tim didn't bring the Tattoos for me to practice on him. He said he forgot. We looked up outfits that we would like to wear as a couple when we would be out. They were getting ready to leave and Tim asked Matt to go out to the car and wait for him. I immediately got nervous. Matt walked to the car. Tim shut the door. He said I need you to kiss my neck a little bit. I need you to be able to grab my ass. I need this to work both ways so we don't get ourselves in a bad situation.

We were standing by my front. I put my arms around his neck and I started kissing his neck. He told me again I need you to grab my ass. When I hesitated he then turned around and pushed me up against my door and started trying to grind up on me. And I could tell that he was hard. So I pushed him away. I snapped at him and said Tim!! He said this is what I wanted to show you, this is what I'm talking about and sometimes this happens and it's going to naturally happen and I just want you to be aware of that. I think I said okay. I was in a little bit of shock. Luckily Matt knocked on the door. I hurried and opened it. He went to walked out the door and said you still need to learn how to smack my ass so I padded it as he walked by me. He said don't ever pat my ass again.



When he left, I felt very conflicted. I wasn't sure if that's how you should be feeling if that is what it was supposed to feel like when they were saying this is a hard job and somebody has to do it. I kept returning my mind to the stories that they were telling me about the operations they had been on, and how amazing it sounded and I kept telling myself this is why it has to be worth it. So Thursday morning comes around which is October 28. This is when we are going to the gym to do the self-defense training class. He of course is texting me in the morning and telling me he's so sorry for staying too late the night before. Kind of giving me a little rundown about what time where we are going to meet that night. Asking me what I'm going to wear we never ended up talking about what we were going to wear and so we just kind of talked about when we were at the gym, we were going to make a list of things that I needed to get together for that night so that I could do makeup and tattoos and stuff for his hair.

So then, he asked me, Are you feeling okay? And I didn't respond. He just kept trying to say like it's okay, and we should be over communicating at this point and telling each other everything. That's what saves our asses and things like that. And at this point, I'm feeling so uncomfortable about what happened the night before. With him pushing me up against the door. I asked him what I talked to C.L. and he told me nothing. And he said but we can talk at the gym. So we got to the gym. Nobody's there yet. Everyone was kind of running late. So as soon C.L. I jumped in the car with her. And we just kind of started talking about how we are excited to do the self-defense class and how we were both really nervous to go to strip clubs.

We were joking about how what we should wear to strip clubs? We don't know what to wear to strip clubs like we are moms. We don't know how to dress slutty. we don't go out, we're boring moms and so we're just having fun which was nice. I wanted to talk to her so bad but I just felt a little scared to say anything. Tim at this point is really pushing me to get a passport. He is telling me that in a couple of weeks they have an ops and he really wants me to go on it with him and because I don't have a passport we need to get it expedited.

He's telling me at the gym I really need to talk with Matt Cooper about it. Everyone finally gets there. There's Matt Cooper, C.L., Tim, Blaine who is Tim's son. He had just got home from a mission a week or two before and a girl named D.M and we found out that D.M. is going to be on the ops with us that night the and we started doing the training. Well. D.M. tells us that she had just barely got a divorce, and she tells us about I think her husband had been in former military so she kind of knew some self-defense.

As we started learning some self-defense techniques, Tim was taking us aside one by one to sign our NDAs he did take D.M. back in the office I believe for a minute. Then he took me back there. I'm not sure if he took C.L. back there or not. He took D.M. back first then when it was my turn, the first thing he said to me was that D.M. just asked me if she could be my partner. And he said, What do you think about that? I said, do you want to be her partner? And he said, No, I want to be your partner. I told him I could be whoever's partner he needed me to be. He then asked me , Oh, are you not jealous? I said wait, what am I supposed to be jealous? He was like, "yeah, you're supposed to be jealous. It's a privilege to be my partner" and I was like oh yes then I'm so jealous in a joking tone. He didn't find it funny. We talked more about it. He started bringing a spiritual side into it. By the end of our conversation I did feel privileged to be his partner. I felt "blessed." Later, we get finished the self-defense training. We signed new DNA contracts.

I never got a copy we left to go home and get ready. When I got in my car I just had a sick feeling so I asked him to call me. So he called me and I just said I don't know I'm getting really nervous. So he once again told me that he just felt so sure that I needed to be his partner.

Even that morning, he had had a dream the night before about some really amazing things that we did to save some children. So he just confirmed that it was just nerves and that I could trust him, and everything was going to be good. He then again called me and he said hey I think just you and I are going to leave your house. We're not going to leave the gym, which is originally where we were all going to leave. He was like I think we just need to make sure you're okay before we meet up with everyone. And I thought oh my gosh, that's so nice.

So he said well, just Uber from your house. Well, when he gets to my house, he is with his son and Matt Cooper, his son who was at the training Blaine. And I was like whoa, whoa, whoa, well, this is not going to be okay. Blaine cannot come on this mission with us. They all reassured me Blaine included that he would not be going into any bars or any strip clubs, that he was going to be on the outside. Just doing things with the phones and making sure we were all where we needed to be those types of things and that I didn't need to worry about that. I just felt like it would have been very strange that I'm there pretending to be a couple with his dad. I didn't want him to have that Image in his mind, nor did I feel comfortable with Tim's son who had just got home from a mission being in a strip club.

So they get everything ready. All the phones are ready, everything connected. These phones-OUR phones that only nobody can connect to except for anyone who has one of those phones. So they give us one and they leave.

Well. Tim was like okay, well now we have to be in character because the second you get off a plane in another country. You are in character. Anyone can be a spy from the cab driver to every single person at the hotel like everyone is working for the sex traffickers. And you have to be in character at all times except for when you are in your hotel room. I was ready for the night but he wanted to go up to my bathroom in my bedroom and put his tattoo on. So we go up, he changes in my bathroom with the door closed. He comes out and I put his tattoo on his arm. And like I think we put a headband on him. Then we're getting ready to leave.

I think our Uber was supposed to be there in five minutes and he kind of just pushes me back onto my bed. And I was like, What are you doing? And he said, "I just want to see how far you're willing to go." And I was like, whoa, what do you mean? And he said I want to see how comfortable you can be, you need to be very comfortable with me. I had a long sleeved shirt dress on and he starts kissing my legs and he lifts up my dress to right underneath where my boobs are. And he's kissing my stomach. I kept saying are you sure? Wait, are you sure. He would say something to the fact like we might have to do this. Like if we're on a beach. We have to show them that this is who we are and that we're very we're a very sexual couple and they have to see this and you have to be comfortable.

"You can't shy away from it and you get very shy. You shy away from this stuff." I would say okay, I think I can do it. If we were in a situation but in my bedroom that feels very uncomfortable. And he kept saying "I need you to show me, I need you to show me" but also his phone kept ringing which made me feel like everyone was waiting on us or Uber was there. So he literally turned his phone off. At this point.

I'm trying to talk to him and ask him questions and so he would stop for a minute and answer my questions and then he would start like kissing my stomach again and kissing my neck and like putting his legs in between my legs. Grinding on me. Asking me to kiss his neck. His stomach. Then my phone keeps ringing and buzzing and so I push him off me I go get my phone. It's Matt Cooper. He sounds very frustrated.

I handed him over to Tim. Tim is like "yeah, yeah, it's fine. Everything's fine. Just get another Uber here." Luckily, the Uber was five minutes away. So I was like I need to freshen up.

He to me to remember the second we get in the Uber. We are in character well before we left. I felt as if I had a headache so I grabbed some ibuprofen out of my drawer before I went to freshen up. He asked me if he could have some ibuprofen. I gave him some and then he also asked if he could have some for the road. I said yes he also asked if I had some Excedrin I said yes, so I gave him some Excedrin as well. Then I shut the drawer and went in the bathroom to finish freshening up.

When I came back I noticed my drawer was open even now. I remembered shutting it. I thought that was strange, but didn't think too much about it. Then we go get in the Uber and we start driving there. Of course he's all over me. He had brought some energy drinks. I noticed that he had put a pill in his mouth and started drinking some energy drinks. It was not the ibuprofen or Excedrin I had given him. I asked him if he just took a pill and he said "yes sometimes I have to take some pills that I was taking for My anxiety." He told me that "when he would take that pill with an energy drink that it would almost make him feel like he had a little bit of a high." I thought well that's great, but to each their own I didn't know what to do. I'm in a car with him once again, everyone's telling me to trust this man. We are sitting in the car. He's telling me that when we are in these situations, we always have to be just very very sexual. All over each other just like groping each other.

So he's just all over me like, even spreads my legs and the car and like puts his hand right there on my thigh and he's like, "Oh, I just love these legs" and is like grabbing them and just being very grungy. We get to the bar slash strip club. And we were the first ones there. So we go inside and we sit at a table and Tim tells me I just need to be all over him. I need to give him lap dances. I need to talk to the women when they come over. And ask them questions and tell them to dance for us and tell them they look nice and ask them what time they get off. Questions like that. He would give me assignments, like I needed to go talk to the owner and ask him how long he's owned the place and talk to certain strippers and ask them how they started and just all these questions so that I could get comfortable talking to these types of people. Then he got us a private room with a stripper. I was completely mortified. We go back to this room.

At this point, Matt Cooper, D.M. and C.L. show up. They need to pretend that they don't know us. They just walked by us. They go sit down and I can see they're talking to people. I'm not quite sure what else happens. I just remember being back in this room with the strippers boobs and butt in my face. Tim had me sit on his lap, so pretty much she was giving me a lap dance with no shirt on and a thong shaking her butt in my face, rubbing her boobs all over me. And finally, I was like, Okay, thank you so much. This was so great. Like we're done and she was like we have five more minutes and I just said thank you. This was amazing, but now I need to go fuck my man. Because that was our safe word. I could not be in there anymore. I had to leave. So we left the strip club and he said "I'm sorry, Was that too much?" And I said "yes. I just need to breathe." So we walked around just in the parking lot for a minute. I got some air and he said "okay, do you think we're good?" And I said, "Yeah, I think I'm okay." And he said "okay, we're gonna go somewhere else."

So I'm just trying to prepare myself. I'm telling myself that I think I can do this. Trying to talk myself into being a big girl telling myself how amazing it will be if I can actually pull this off and help all these kids and what that will feel like and that somebody has to do this hard job and that I can do this and that I need to be a bigger person than what I was being in that moment because that is what Tim is telling me. And I'm believing in him. So we pull up to this next strip club. At this one we all walk in together. There's a lot more people here and this one is dirty, gross and vile.

Most of the women do not have their shirts on they have little to no underwear on. I am feeling sick to my stomach. I wanted to cry so I excused myself. I go to the bathroom. I'm in a stall. It's disgusting. I don't even dare to pee. I just lean my head over because I don't want to mess up my makeup. And I let the tears just fall to the ground because I don't want to mess up my makeup. I'm trying to keep it together. But this is so hard for me. I pull it together as much as I can. I don't have my phone. We aren't allowed to have our phones. So I'm just really trying hard to be okay. I washed my hands and I went out and I noticed that Tim has his arm around D.M.. C.L. is sitting in a booth with Matt Cooper. And Tim walks over to me and asks me if I'm okay. And I said yep. And he was like okay, come with me and we start dancing and then he takes me into this room. And he whispers in my ear Are you okay? And I just nod and he says okay and we are in this little room by ourselves.

There's a curtain and a woman opened it and they opened it and asked us if we want someone to come dance for us and he tells them now that I'm going to dance for him. So he tells me I need to give him a lap dance. So I start giving him a lap dance and next thing I know his son opens the curtain and I'm staring him straight in the face and he is watching me give his dad a lap dance, I lost it. I came unglued. Blaine his son turns around, says sorry and walks away. I told Tim I was done.

I freaked out. I told him we're all done. We are all leaving this night is over. I told Tim he lied to me and told me that this would not happen. They all promised me. When I walked out of that room Blaine was sitting at the bar, he's literally staring at this girl on a pole with her leg up to her head and her vagina is sticking out of her thong. like in the middle of her vagina. So her vagina is completely hanging out and he's like a deer in the headlights. I grabbed him. I tell him he needs to leave. Then I went and grab Matt C.L. and D.M. I said we are done. I am so upset. Blaine should not be in here.

We are leaving at this point, I've never seen this older gentleman but he is clearly a part of OUR and the team. He came up and apologized to me. I just said whatever. We are all leaving. We are all outside. Tim went over and talked to Blaine for a minute. Then mine and Tim's Uber came. We all got back into our cars and met back at the gym in Draper. I honestly do not remember my conversation with Tim on the way back. I just remember walking into the gym. Everyone was looking at me with faces like oh shit. And I walked right up to Blaine and I asked him if his mom knew where he was that night. And he said, she knows I'm here with my dad. And I said, so what does she think you're doing? And he said, Well, she thinks that I'm just helping with training. Does she know that you were going to strip clubs and he said no. And I said Would she be okay with you going to strip clubs and he said no. Earlier that night when he was at my house helping with the phones he had told me that he had a girlfriend and that she had waited for him while he was on his mission and I said how do you think your girlfriend would feel with you being here? And he said not okay. And I said that there's your answer. You should not have been here tonight.

He said it's okay. It's okay. I've known about this and I've been training for this my whole life. And I said you really should think about getting a different job. If you want to do this. Do a different part of it. So we all huddle up. I'm standing in the corner because I'm so pissed off and everyone still is just kind of apologizing, like we're so sorry. It's really awkward. I don't really remember the rest of the night. I got a message from Tim the next morning at 6:52am that said you were fantastic. I really do want to keep working with you. We will work out the emotions and tactics and so many things will revolve around ops. Let's talk very soon . We ended up talking on the phone a lot that day and from then on we talked a lot about spiritual things. My

dad had been diagnosed with a brain tumor about a year and a half before that and it was terminal.

I was really struggling with my spirituality and God at the time. My dad at the time had a brain tumor and was dying. I confided in him about that. I confided in him that I had depression and anxiety. He confided in me that night that he had had a major meltdown. Like a complete meltdown in front of family, friends, his wife, his kids, and that this is him kind of coming back from this that he had not done operations for a while. That this is coming back and that even now after that night, how he saw how I protected Blaine and even him that he felt even more that I was supposed to be his partner. Tim said he felt very, very safe with me and that he knows that I will protect him. He wants me to know that he really does care about me and he thinks that this is going to be a really great relationship.

He was joking and saying that I was his drug provider, his waxer, his hairstylist, his massage therapist, and he was saying this is awesome like I was everything for him. We were texting really late and because I didn't. He was saying that I was just all these things for him. I was trying to turn it around and I would always do this. I would turn it around on his wife and I would say go to bed like go make love to your wife. Go do something for your wife. Go do something for your kids. I would try to turn things around on to his family. I could tell he was relying on me heavily for his mental stability at this point. I really was starting to care for him. Only as a friend. As someone I looked up to and realized he had been through so much.

We just kind of keep talking and texting at this point. When we did see each other I don't believe there was any touching or uncomfortableness that way. It would be quick for a haircut or a wax. right before the gala the end of October. He came over and he just he told me that he was feeling a little unsettled and that he wanted to talk to me about some things. he just kept talking to me about how safe he felt with me how he could talk to me about anything how he wants to tell me his deepest, darkest secrets. That he feels like he can relate, and rely on me that I'm the only one right now that he can talk to and even feel safe with. He was often making comments though that were like please don't come after me. I don't want to sue you. You know if you went to the public and told them all these secrets that I'm telling you, that you would have your small moment of fame but it wouldn't be good. It would look like we are having an affair. You would just look bad. And I would just kind of ask him why he would say that. And he would just say everyone that I love turns on me. Everyone that I love makes up stories about me.

I wanted him to trust me. I wanted him to feel like he had a friend in the world. I wanted to be there for this man who has done so much for everyone and quite honestly, I wanted to help him with his wife. I had seen her. I saw the sadness in her eyes and all of it made me very sad and when he had talked about his former partners to me and how they had fallen in love with him. I was not attracted to him in that way. So I felt very much like that was going to be an easy thing for me to do that I could just be his friend. At this point he has come over a couple of times. I'm not sure exactly what we have talked about but or what the days are. This is all the end of October but he has talked to me about number one, the operator D.M. who went on the training with us.

He told me that when we were out that night that she had made him very uncomfortable and that she kept saying I should be your operator I should be with you. And that even at the end of the night he kept saying you should date my son. You should date my son, just to show her that he was not interested in her and that he didn't want her to be his operator. He also told me about his previous partner D.S., that they had worked so well together but she just could not help but fall in love with him and she was so in love with him. She had tried kissing him. They still

remained friends. It was hard on Katherine, knowing but not knowing. Sex was difficult for them. She didn't like to be naked or be waxed because she felt he would just picture little girls vaginas. He also had told me to read this book it was called the *Visions of Glory* and that he had met with the man who wrote it before he had died. His name was Tom Harrison, and that Tom had told him lots of visions that he had had that actually had Tim in them.

He said that Tim would be a prophet of the LDS church one day that he would be the President of the United States. He told me that he also had another psychic friend, one here in Utah that she would tell him things like who his partners should be. That she would tell him a lot of times where he could find the children and where the sex traffickers were and that's where he sometimes got a lot of his information from. He had been going to California where he was doing shows on PragerU. He was telling me that they wanted him to start hosting his own show. And while he was there, he had met with this lady who had done tantric on him he said that they got naked together.

She didn't touch him, but she did sit behind him and that she would do these tantric exercises on him and that what would happen is it would get out all of the bad like Juju in him and what would happen was at the end, he would have an orgasm, and that he would get such good relief, but he felt that it was okay. Because they weren't touching. He wasn't attracted to her. She was an older woman, not attractive, but he was getting out all the gross toxins and stuff in his body. But that he could have an orgasm, and he would ask me if

I thought he should feel bad about it. And I asked him if Katherine knew and he said no, and I said, then maybe it's something you should not be doing. You should probably have a conversation with her. Or if not, like just maybe don't do it. I thought it was the strangest thing and he kept saying, oh my gosh, you should try stuff like this. You should do stuff like this. And I told him I was not interested in that. I had told him about this show called the goop lab with Gwyneth Paltrow and that they talked a lot about things like sex and being in your mind and all of these things. I told him that I thought he should sit down and watch it with his wife, and that maybe it could help because he would always try to talk about his sex life about Katherine with me.

I would not want to talk about it. And he would just say they couldn't talk about it openly. So at the time, I mean, I'm a hairstylist, a lot of women talk about these things. And I had heard a lot about this show, and so I told him to watch it with her. That's when he started telling me that like he had had this therapy session and that's when he was telling me about this tantric stuff. Then we have the gala. He put me and C.L. in the very front of the Gala. He sat us at a table with Matt Osborne, and Dean Morgan. He sat me right by Dean and he also sat me next to his operator, the one he had been telling me about D.S. and her date. It felt very strange because automatically C.L. and I went to sit by each other. And Matt and Dean split us up. So, Matt saw C.L. across the table from me, and sat right next to her and Dean sat right next to me. Which we both were like looking at each other, even text each other like what just happened? This is so weird. Dean was very nice. He started talking to me and asking me questions just about my life and how I was liking training with Tim, And if I liked being like his partner and things like that, kind of asked me what sort of training we were doing, and I started feeling a little bit that I was being interrogated.

I sort of felt the need to be careful about what I was answering. I sort of started dodging his questions. I was feeling very nervous. For one the contract I signed says I can't tell anybody about it being an operator. Not even anyone else in the company, not other operators. Nobody. So I'm feeling super nervous. I'm wondering even if it's a test. I'm feeling very uneasy. So I kind of

am dodging his questions. I also had been talking to Tim and telling him that I was feeling very unsure about moving forward. I felt like he was not in a very good place and I was feeling very heavy with him. I felt like he was relying on me for his mental stability at that point. And he just kept trying to say like, come to this gala.

It's gonna be so great. It will be so fun and let's talk later and I kind of thought at first that he was sitting us right up front to just kind of like woo me and keep me going in this direction. But then I'm sitting next to D.S. who I feel she also is asking me lots of questions. Like what kind of training have you done? Have you gone out with Tim yet? And I felt the need to ask her questions. And I said did you feel it was worth it? Did you feel safe with him? Did you ever feel like you were in awkward situations? She just kept saying no, no, no. And I don't know if it's because her boyfriend was there. If Dean was listening or what but she was just saying how it is the best you can trust Tim with your life.

He would never put you in a situation that you could not get out of. He would put his life in front of yours. He promised to always keep me safe. And she said at some points you are going to have to be uncomfortable that he would never do anything that he is not supposed to do. And I said okay and that capacity it made me think okay, I think maybe I can move forward. She talked so much about how it was so worth it. Saving the children. It was so great. Being there how you felt important you felt like you were doing so much good. All of these things and it gave me some courage to keep going. The gala is done and people are dancing and talking. I decided to go to the bathroom. Because I feel that I'm in a very awkward situation sitting in the middle of Dean and D.S. I make my way to the bathroom.

I ran into Tim's wife and I had only met her the one time before when I did Tim's hair but I stopped her because Tim said that she felt like I should be his operator and I wanted to talk to her. And I said hi Do you remember me? I met you when I did Tim's hair and she seemed very very uncomfortable with me. She said oh yeah, she was very kind very nice, but it seemed as if it was an uncomfortable situation for her. And she did not seem to know that I was an operator for him. She said oh are you still doing Tim's hair? And I said yes. And she was like, That's so great.

It's been looking good. She said she was sorry that I didn't like it blonde and that she might have been weird that day. And I said oh please don't be sorry. Please don't apologize. I hope that you ended up liking it. She said she did. And I just told her she looked beautiful and we moved on. I figured she didn't mention me being an operator with him because everything is so hush hush. On the way back from the restroom I ran into C.L. in the hall and also Dean and Matt Osborne. I automatically felt very, very trapped. I felt like they had pulled us out in the hall. To ask us questions. They start asking us like what kind of training we have done? I just look at C.L. I don't know what to say. I don't know what to do. And she tells them that we had done self-defense.

We had gone out with Matt Cooper and done some shooting. They tell us just so you ladies know if Tim ever asks to take you to strip clubs, that is not something you should be doing. If you're ever put in a situation that you feel uncomfortable with, you guys need to let us know right away. We have very different opinions on how things should be run. And we would like you guys to let us know if you are ever in any of those situations. Well, a couple of weeks before we had just been in strip clubs with Tim so we clearly felt very awkward. I'm a rule follower. I clearly wanted to run away from this conversation. Dean kept looking at me. He knew by my face. I couldn't even speak. Matt Osborne gave C.L. and I his card and said thank you for sitting by us, and they walked away. We both said we were done with the gala and we left we got in the car. We both felt so very uncomfortable. at the gala we weren't sure what was going on.

C.L. and I had met up and drove together so luckily we were driving back together. Anytime we had gotten together with Tim and Matt, They had made us turn off our phones because they didn't want anyone to listen in on our conversations.

I had a camera in my house and Tim would always make me turn that off. So we were even scared to talk in her truck with our phones on. We turned them off so we could talk openly. Before this night I had never told her anything about my long time with Tim or how I had felt uncomfortable or any of our private conversations. I even showed her my text messages with him. We both talked about how the gala felt very uncomfortable and how some things with him for sure were inappropriate that he really probably should not be going on ops. The gala was still going on so I was not going to reach out to Tim and I was going to wait a day or two and kind of process things. And we both were unsure of where to go or what to do. So I decided and I waited a couple days.

Tim ended up texting me. Asking me if I could wax him and give him a haircut. I said sure, but so much happened the other night I felt blindsided and he did not know what I was talking about. He said that we needed to talk. So we had a conversation. I told him that the rules I feel that he gives me, I cannot talk to anybody about anything. Don't apply to other people because not only did D.S. know that I was his operator. So did Matt and Dean, which obviously they work there and I understand but we are in public and aren't supposed to talk about it. And I was shocked that D.S. knew that I was his operator. Then she was asking me questions, and I felt that she knew things about me. So I just said to him, I feel like you apply these rules to me. I can't talk to anybody but everyone else can talk to me about it and open up to the public. I felt that they were interrogating me.

They told us that we were not allowed to go to strip clubs. He told me that he was sorry that he put me in that situation, that this training program was new and that they were kind of still building it and that they weren't on the same page but also that he is the boss. He is the head of the company and he will do whatever he wants and then things start getting weird. The ops that we were going to go on kept moving. It moved to January then it was moved to February. He started distancing himself from me a little bit more. I started feeling very unsure. C.L. and I had talked some more.

I was worried that she had talked to Tim more and kind of told him I was uncomfortable. Which did happen, and is okay. Tim wanted to talk. I told him that maybe coordinating with Matt Cooper, C.L. and I would be better. That way if it is just about operations then it might feel a little more comfortable so that we could all be together. We talked about how we were going to do more training and start doing ops in the spring. He wanted to be waxed before and he said he didn't want C.L. to know that he gets waxed. He was embarrassed and asked me to have them meet before and after. We did that. I had him come a little before, so we could wax his face really quick. That way he couldn't stay after for a long time and use that as an excuse. Of course he wanted to stay after I wouldn't let him. I didn't really want to talk to him about his personal life. I was trying to separate it out of our relationship. I had also talked to him about how I felt that Katherine did not know that I was his operator. He told me that he and Katherine talked about it in the temple. She did know that she also wanted me to be her hairdresser. I started just feeling like this was not okay. I wasn't feeling comfortable with any of it. Sometime in the middle of December He started telling me that he was not going to do ops anymore, that he was going to run projects from home. so we had a talk on the phone. He wanted me to work with other operators. He called and texted me many times. He was so worried that I had talked to C.L. and told her that I had felt uncomfortable. He was worried that I would use my 15 minutes of fame



and say something. He was worried about all the personal things he had told me that I would come out to the public. He would just tell me over and over how he had been under investigation. How all these evil people are after him. How it's so hard when you are doing all this good because evil just comes at you so hard. I genuinely felt so bad for him. I also felt guilty. I felt guilty for thinking that things that he had done to me had crossed the line. I felt guilty for having the thoughts come in my mind that maybe this was wrong. I felt guilty for feeling sick when I was at the strip club. I felt guilty for telling C.L. and showing her the texts. I was just kind of telling me that he was getting off all this medicine and he was getting ready to go to this camp where they would, I'm pretty sure, do like psychedelics on him for his brain. To help him get through all of this stuff. She just kind of kept texting random things. Nothing big he kind of I felt like started getting a little bit deceptive of like, I tell people things. These are things that happen and they always turn on me like I want you to be in my life but I'm so worried that people I just don't want you to tell anybody anything I said that's what he just kept worrying about. He wanted to get together but he was worried about our boundaries because we weren't doing ops anymore. I just kept telling him it's fine. We don't need to be worried about anything. That was it. We kind of talked about how he thought I should write a book about things from my past with my ex and things that I had endured. We realized we knew somebody in common, my cousin. He kept on about the book. We should get together and talk about writing that book. And that if we got together that he could help me figure out how to do it. I also wanted to introduce him to one of my married friends. The husband wanted to really work for OUR he had and talking to B.C. as well. But I told him that I knew Tim Ballard that I did his hair and I would ask him personally. So I kind of brought it up to Tim and he said yeah, I would love to get together. We can talk about writing a book for you and maybe we could meet your friend and we could do those things. So he also was talking about how he thought maybe I really should do operations and partner with somebody else. All of these things. This is just all through text. At this point, I'm really sort of thinking that he feels very much like a narcissist. I asked him if he'll read a few books if I asked him and he said yes. I send them books on narcissists. And he said he will read them. More than anything I kept sort of pushing to get together with him for my friend because he really did want to get a job and meet with him. He was also kind of telling me about how he was still getting depressed. We got together. He kept wanting me to wax his chest. I told him that I would wax his chest if he really needed at waxed and his neck and like his face and stuff and so he kept asking me to do it at my house. I did not want to do it at my house alone with him. So I asked him to meet at my sister's studio which is in my parents basement in Pleasant Grove. Cooper came with him. We just went down there and we waxed it when we went to leave. When we were done, he went to hug me and he put his head in my neck and kissed my neck and I was like "Ah What are you doing?" And he was like, "Oh, I'm sorry. I'm sorry." I was like it's okay. It's okay. And he apologized it about it. He just said we are just friendships. "Good. It was just very weird." So at this point, we just text until about January . The beginning of January and we just text about random things we don't really get together. I'm still kind of talking to him about helping him, having him help my friend get a job there. Finally we met together with my friend and. We met together with Ryan, Matt Cooper, and at my home. At this point I had been telling Ryan that I did not think it was a good idea for him to be involved in OUR. He really badly wanted to be an operator. I told him that I thought it was a horrible idea. I did not think his marriage would survive it. I obviously could not tell him what it was about because of confidentiality. I told him that I would get him a meeting with Tim. I actually asked Tim to really be honest with him about what it was like because I did not think his marriage could survive it.

Tim said that they did have other options of things that they could do and that he could probably get a different job there. Well Tim and Matt Were here first they came here Tim felt a little bit off when he got here. They were only here for maybe about five minutes before Ryan got here. Ryan showed up. I don't remember what much they talked about except for when Tim started telling him that if he wanted to be an operator, that it's a crazy, horrible job. He started being very, very, vulgar, talking about things that they have to say to the sex traffickers in order to get them to believe that they are there to buy the children. He was saying horrible awful things about things he would want to do to kids. And His face changed. His demeanor changed. He was showing Ryan that that's what it would be like. But not only that, it was like he kind of couldn't get out of the mode. He couldn't change back. He became vulgar and I didn't recognize him. Right, Ryan left. And Tim's started freaking out. He was opening my cupboards and slamming them. I looked at Matt Cooper what is going on and he asked me to go upstairs for a minute. So I did. I went upstairs and I could just hear Tim yelling. I shut my bedroom door. I was honestly afraid. He was yelling, and I could hear doors slamming and my cupboards opening and shutting again. And I came back down a little bit later when Matt told me I could and he said he was fine but that they were going to leave and that was that.

Somewhere between the evening of January 7 to the early morning of January 8 of 2022 Tim Ballard came over to my home. He came over because he needed me to cut his hair. He was going on a vacation with his family. I don't remember where they were going, but they were going to be on a cruise for I believe a week or two somewhere. He was really nervous about going and being away for that long. He had just done some intense therapy with the military. So he was hoping that he would be good mentally. When he arrived at my house, he seemed very intense and out of sorts. He was pacing in my living room. He looked stressed out. He was a little red in the face and he started breathing heavily. Like he was having a panic attack. I told him to sit down, he sat on my couch.

I put my hand on his chest and kind of started rubbing it. I told him to just breathe. He started calming down and I gave him a hug. He pulled me in closer and nuzzled his head and to my neck, he started kissing my neck. I felt like he was in a delicate state. So I was trying to be gentle. I told him Tim you're okay it's okay. He said no, this is what I want. I said it's not what you want, this is not what you want. I stood up and sat on the couch on the other side of him. He came over and kneeled in front of me and asked me if I believed if we came back reincarnated as other people in different lifetimes. I told him that I had never thought about that before and he said that he did.

He believed that he and I had been married in a different life. That is why he was so physically attracted to me, and emotionally attached to me he asked me, if Katherine had ever ever died or if they were to ever get divorced if I thought we would get married? I wasn't really saying anything. I was in shock and a little bit nervous about what he was saying to me and what state he was in. I asked him what was going on and what was going through his head and he was still kneeling in front of me and pulled me closer. He put his hands underneath my shirt in the back and started to pull up my shirt. about a month before that I had had a boob job. So I "told him to stop, Tim that hurts."

He said I'll be careful. I still did not have a lot of strength. I was nervous. I didn't want to hurt myself but I did not want him to hurt me. I was really nervous about the situation. For many reasons.

I was trembling. I asked him multiple times to stop. He kept saying to me just trust me, you can just trust me right now. All I could think to say was just stop, and ask him what's going

on. and He still had his hands underneath my shirt and pulled it off the top of my head. He said I just want to see I just want to see. At this point he unclipped the back of my bra. I'm trying to get up off the couch. I told him that it was hurting me. I wanted to get up. He was standing over me so I'm having a hard time standing up. I turn over on my stomach and finally stand up. As I'm standing up he takes his shirt off and he grabs me and he just hugs me. He said I just need to fill you. I just need to be skin to skin. I'm honestly terrified. I'm not sure what to do. I felt scared. Nervous. I said Tim, this isn't you. He yelled a little bit and he said "I don't even know who I am." Nothing feels like me so I just kept saying Tim you're okay, you're okay I tried to kind of back away as I was saying that. I thought maybe he was going to put his shirt on again. But instead he started. He started following me. I started walking towards my front door still with my shirt and bra off.. He started telling me he knows that I want him, he knows that I can feel it too.

He starts undoing his pants and he takes off his belt. I'm backing up against my stairs. And before I can get even a few steps up, he grabs me and pushes himself on top of me so I'm laying against the stairs. He pulls down my pants maybe to my knees or calves.

I squeezed my legs together so she couldn't get them off more. Or open my legs more. I don't remember if his pants were all the way off or just halfway down. He starts grinding on me. I just remember squeezing my legs closed tight as I could. He starts telling me how beautiful I am. I'm starting to feel like I'm going to freeze up. I feel very trapped. I tried to get him to look me in the face. He wouldn't. He just kept almost talking to himself like he was talking himself into whatever mad state he was in. Finally, when he did look me in the face I said Tim you don't want to do this. "Please. Tim" he stood up, zipped his pants up.

Up grabbed his shirt and walked out my front door. I'm not even sure if at first I thought that I was sexually assaulted. I think that I still felt bad for him. I remember wondering if I just had an affair. I remember thinking What did I do wrong? What was I doing? To make him think that I wanted to do that?

I started questioning myself if it even happened. I started feeling really sick. A lot. I was sad a lot then my dad died a couple of weeks later and I don't think that I could think about it anymore. I think anytime it popped into my mind I would push it away. I had this self doubt that was always there. Because I felt very unsure of what happened. Why did it happen? I almost refuse to think about it. Until I ran into him back in June of 2023. At the CEO fight nights up in Salt Lake I remember looking at him and feeling sadness.

But I could not understand the look on his face of terror when he saw me. He looked mortified. I couldn't figure it out and I couldn't stop thinking about it for weeks after. But any time I would try to think about it I kept having weird flashes and I would get really sick again really really sick. Then the Sound of Freedom started coming out for his movie. Tim is all over the news. People everywhere are talking about him. What an amazing guy he is, I start remembering things even from our trainings and I start getting flashes of that night and it wasn't until my friend Jamie Means and Ryan Means who are friends with B.C. who worked at OUR asked me if I wanted to talk to B.C. Jamie and Ryan told me that a while ago they told B.C. some inappropriate things had happened to me with Tim, and that she wanted to talk to me that she had been talking to some lawyers because inappropriate things had been happening to other women.

I just started crying and I had no idea why. During the next couple of weeks I looked at B.C.'s number. I was afraid to call her. I've known B.C. for quite a few years. We have just seen each other at different things for mutual friends the Means. All I know is that my heart and my body were not OK and I had to figure out what I had been hiding from myself. I wasn't totally sure why. I just knew in my heart that something had happened. My body and my mind weren't

letting me go there. And as I was talking to B.C. and I started telling her what happened. And she said, Well, you were sexually assaulted. I think I was not even in a normal state of mind as I was talking to her and she told me that.

I got off the phone and every little thing came back to me. And even then it took me quite a few days to really understand what happened and where my mind was at at the time of the assault. And why I was thinking the way I was now looking back on my life ever since I've met Tim and seeing what it's done to me. I lost my job at the end of May of 2022. I have been really sick on and off. I haven't been able to keep my clients like I have my whole entire 20 years of doing hair. I haven't been functioning on a normal level. I have learned to block things out the last couple of years. If I feel scared or threatened I will just block and pretend everything is fine. Then I go home by myself and fall apart. I can pull myself together for maybe a month and then I fall again. I know that I don't want this to happen to other people. I know that I would like to get help so that I can move on with my life and recover from what's been happening.