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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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*Attorneys for Plaintiffs*

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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; LIBERTY AND LIGHT dba  
THE SPEAR FUND, a Utah non-profit  
Corporation; ROCKWELL GROUP, INC., a  
Utah corporation; NAZARENE FUND, INC.

**FIRST AMENDED COMPLAINT**

**(Tier 3)**

Civil No.: 230907617

Judge: Chelsea Koch

**JURY DEMANDED**

dba THE NAZARENE FUND, a Utah corporation; SLAVE STEALERS, LLC, a Utah limited 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; BENJAMIN PACK, an individual; MARK REYNOLDS, an individual; STEPHAN FAIRBANKS, an individual; MARK BLAKE, an individual; BRAD DAMON, an individual; MATTHEW OSBORNE, an individual; MATTHEW COOPER, an individual; and JOHN and JANE DOES 1-100,

Defendants.

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Plaintiffs WW, DS, HDT, MK, and DM,<sup>1</sup> by and through 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.

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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. Likewise, Defendant The Spear Fund, an alter-ego of Tim Ballard, issued a statement to the press stating that it knows the identities of these women.

5. Plaintiff DM is an adult citizen and resident of the State of Utah.
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 Rockwell Group, Inc. is a Utah corporation.
9. Defendant Nazarene Fund, Inc. dba The Nazarene Fund is a Utah corporation.
10. Defendant Liberty and Light dba The Spear Fund, which claims to be a “trusted 501c(3)” working to “end human trafficking in our time,” is a Utah non-profit corporation.
11. Defendant Slave Stealers, LLC, is a Utah Limited Liability Company.
12. Defendant Children Need Families Foundation is a Utah non-profit corporation.
13. Defendant Deacon, Inc., is a Nevada corporation.
14. Defendant Ballard is the alter-ego and face of the above--named corporate and company entities, which will be collectively referred to as "OUR" as Ballard wore many hats within the companies and no distinctions between the companies were 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 ("J.A. Blake") was 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 Benjamin 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. Defendant Mark Blake ("M. Blake") is a member of OUR's board and is an adult citizen and resident of the State of Utah.

23. Defendant Brad Damon is a member of OUR's board and is an adult citizen and resident of the State of Utah.

24. Matthew Osborne is a current or former principal of OUR and is an adult citizen and resident of the State of Utah.

25. Matthew Cooper is a current or former employee of OUR and is an adult citizen and resident of the State of Utah.

26. This Court has jurisdiction pursuant to Utah Code § 78A-5-102.

27. Venue is proper pursuant to Utah Code § 78B-3-307.

28. 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**

29. Timothy Ballard is an American activist, speaker, and author.
30. Ballard claims to have worked for the Central Intelligence Agency (CIA) and as a special agent in the United States Department of Homeland Security.
31. 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.”
32. Ballard founded the non-profit corporation Light and Liberty dba The Spear Fund as a landing spot for him after being fired by OUR; it operates as the alter-ego of Tim Ballard.
33. The other corporate defendants were created by Ballard in order to funnel the donations coming into OUR into corporate profits and shareholder distributions.
34. 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.
35. At all relevant points in time, Defendants Anderson, J.A. Blake, Mortenson, Pack, Reynolds, Fairbanks, M. Blake and Damon are and were members of OUR’s board (collectively "The Board") and owed fiduciary duties to Plaintiffs, and donors.
36. At all relevant points in time, Defendants Osborne and Cooper are and were principals and/or employees of OUR and had actual knowledge of Ballard’s and/or OUR’s misconduct and misrepresentations.

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 noble cause.

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, with Reyes 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.

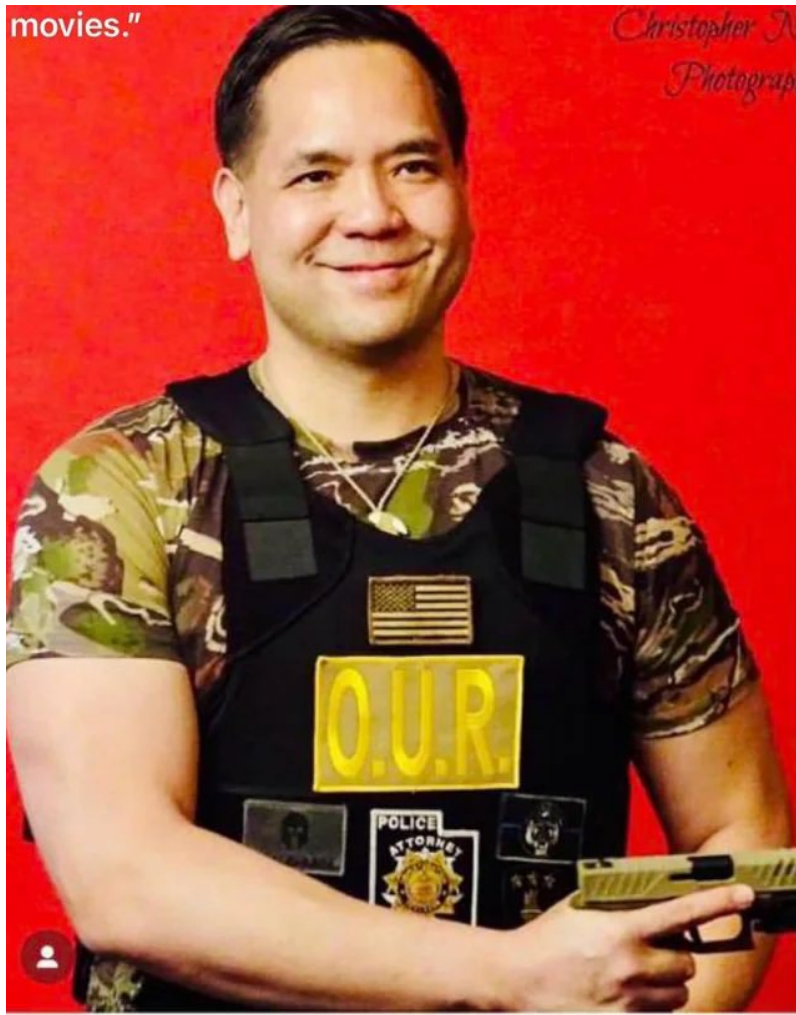
48. General Reyes has repeatedly vouched for OUR and Tim Ballard, even participating in an alleged OP in Colombia, which was well publicized in Utah, giving Ballard the cover of the top law enforcement officer in the State of Utah to carry out his purposes, including the COUPLES RUSE, even while consumer complaints and criminal investigations were coming into his office regarding the improprieties of OUR and Ballard.



49. General Reyes gave undue credibility to OUR and Tim Ballard with foreign leaders. *See* Exhibit F.



50. Complaints of fraud and sex abuse by OUR and Tim Ballard were coming into the Attorney General's office, and it was determined that the Davis County Attorneys' Office would conduct a criminal investigation of Tim Ballard and OUR, as the Attorney General of the State of Utah had a conflict of interest because of his involvement and support of Tim Ballard and OUR.



51. OUR began claiming credit on its webpage and blog posts for work that other organizations were performing. *See Exhibit G.*

52. When these organizations started criticizing OUR on social media for its fraudulent hijacking of Plaintiff's organization's work, OUR and Tim Ballard began attacking them.

53. Some of these organizations reached out to the Davis County Investigation team based upon their experiences with OUR's and Tim Ballard's dishonesty and attacks, and what OUR was actually doing.

54. The Davis County Attorneys' office issued subpoenas to some of these Complainants for them to provide certain documents and testimony related to its investigation of OUR. *See* Exhibit H.

55. Upon learning of these complaints, Attorney General Reyes would step in, and rather than investigate what OUR and Tim Ballard were doing, would intimidate the complainants

56. Some of these complainants became very nervous, which anxiety was justified as both Plaintiff and Troy Rawlings were threatened with a lawsuit by OUR and Tim Ballard, and OUR and Tim Ballard hired a law firm in San Francisco to sue Troy Rawlings.

57. At this same time, others who had made complaints against OUR and Tim Ballard (critical and highly credible witnesses), began withdrawing their complaints based upon fear of retribution by OUR and Tim Ballard, thus impeding the Davis County Investigation. *See* Exhibit I.

58. The Davis County Investigation revealed that OUR and Tim Ballard were aware that allegations were being made that Ballard failed his CIA polygraph test, was on an unpaid intern at the CIA, and was fired from the CIA. *See* Exhibit J at p. 6, ¶ 58 (b).

59. OUR and Tim Ballard were aware that eight different women had complained to the Davis County Investigation that Ballard had engaged in sexual affairs with them. *Id.* at p. 6, ¶ 58 (a).

60. OUR and Tim Ballard were aware that the Davis County Attorney believed that Katherine Ballard had tampered with witnesses to impede them from cooperation with the Davis County Investigation. *Id.* at p. 7, ¶ 58 (f).

61. Troy Rawlings also believed that General Reyes “was guilty of witness tampering.”

62. Rawlings alleged to have written communications from AG Reyes to a witness requesting the witness not to cooperate with Rawlings in the Investigation.” *Id.* at p. 7, ¶ 58 (h).

63. OUR went to its de facto general counsel, Sean Reyes, and asked that a special prosecutor be appointed to prosecute Troy Rawlings. *See* Exhibit K.

64. Troy Rawlings went to Attorney General Sean Reyes and informed him of OUR’s threat to sue him, which General Reyes immediately informed Tim Ballard and OUR of Troy Rawlings’ concerns and deemed Mr. Rawlings’ statements as “false.” *See* Exhibit J at p. 5, ¶ 49.

65. Even as more fraud complaints came into General Reyes, he would immediately send them to Tim Ballard on his personal email, instead of his official Utah email. *See* Exhibit L.

66. At this time, Tim Ballard was ignoring his in-house counsel’s advice that what he was doing was illegal and unethical and could subject him to criminal liability from the Davis County Investigation and the Department of Justice. *See* Exhibit M.

67. Ballard claims to be blessed by Thom Harrison, both while Thom was alive, and through Spear President Ken Krogue, claiming to anoint Ballard as a chosen one, not subject to the jurisdiction of government and church authorities. *See* Exhibits N and O.

68. 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” or “Mormon

Church").<sup>2</sup>

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



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

71. The Davis County Investigation, according to OUR's own internal documents, revealed that Elder M. Russell Ballard and other authorities from the Mormon Church, provided Mormon tithing records to OUR to help OUR target wealthy donors and wealthy Mormon

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<sup>2</sup> Because the full name of the church includes the name of deity, Plaintiffs' counsel will refer to The Church of Jesus Christ of Latter-Day Saints as it is more commonly known, the "Mormon" church, in order to limit the use of the sacred name of Jesus Christ. No disrespect is intended by the apparent informality.

Church Wards. *Id.* at p. 7, ¶ 58 (f).

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

73. 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.

74. 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.

75. Despite the very public distancing recently of the Mormon Church from Tim Ballard, the Mormon Church continues to promote OUR.

76. For example, on October 15, 2023, OUR's President, Defendant Osborne, gave a 'Fireside' on "grooming tactics," "extortion schemes," and other matters, in the New Braunfels 2<sup>nd</sup> Ward in Texas.

THE CHURCH OF  
JESUS CHRIST  
OF LATTER-DAY SAINTS

New Braunfels 2nd Ward

The 1st Ward has extended an invitation to all adults and youth 14+ (accompanied by a parent) to attend a devotional tomorrow October 15th at 7pm.

Matt Osborne, O.U.R. President, will address topics including:

- Internet Safety
- Grooming Tactics
- Extortion Schemes
- Situational Awareness
- Conversation Openers

Please see the attached flyer for additional information.

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You received this email because you made your email address available to your local Church leaders. It was sent by Nathan Hirschi Manning, whose calling is Ward Assistant Executive Secretary.

77. 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.

78. Tim Ballard and Glenn Beck formed Defendant company Nazarene Fund 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.

79. Beck, along with Attorney General Reyes, (who should have been looking at arresting and prosecuting Tim Ballard after the sexual assaults and fund raising being thrown upon the citizens of the state of Utah by Tim Ballard), became a fixer for Tim Ballard when the extent of his sexual depravity became known to the Mormon Church.



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**Nonupdate update**

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Glenn Beck <glb@glennbeck.com>  
To: Tim Ballard <timblainballard@gmail.com>

Sat, Sep 16 at 6:31 PM

Tim,  
I have spoken to Elder Andersen, who is out of the country, Mike Lee a few times and Sean Reyes today.

First, Elder Andersen did not have any information that was new as he has been out of the country. He said he knew that this was urgent and would be talking to some of the Brethren and would get back to me this week. He indicated that the language of betrayal was disturbing, but he knew very little beyond this. He was very concerned about you as well as the church and promised to get back to me as soon as he heard anything. He did urge caution for everyone until we know more from the Church authorities. I urged him that time was of the essence. He understood and said he would do all he could from where he was.

Second, I spoke to Mike and Sean several times today as well. I feel strongly that we KEEP OUR POWDER DRY until we know exactly what is happening with the Church. ANY false or inaccurate statements or speculation from anyone on your side Tim, again ANY, will prove deadly to the cause of Justice. I believe you should speak to Sean and Mike about an attorney outside of Utah, with NO Mormon ties to avoid conflict, that can soft pitch the idea that you are asking for the church to be clear and go through the usual church 'court' process. That it is disturbing that you found out about this the same way everyone else did. One of the things that you love about our faith is that The Lords house is a House of order. So you welcome the order to return so you may continue as a saint in Good Standing which I currently am. They and you should deny any lies that are being spread. But, (be careful here) you don't think it is a coincidence that you have been seriously considering a run for Senate as these accusations come forward. YOU pray that you your family and the church are protected from secret combinations that wish our faith and our country harm. AGAIN BE CAREFUL here.

A soft statement should be made on Monday. As we have PROOF what happened within the church. When you have the truth, when Sean has proof of what he needs, Mike has what evidence he needs to prove anything political. (I might consider a credible investigator) Then and only then should you move forward.

This very well may be the first shot across the bow to let all of us know, Satan has the unrighteous placed in all high places. We need to be very strategic about any moves from here. We are playing chess now. The days behind us I fear will soon feel like we were playing candy land.

You have known the importance of your calling. The gates of hell have opened over and over for you, Kathleen and the family. Know that God loves you and is with you. Let Him be your sword and shield. He is not unaware of your plight. If the days in which we live are indeed what we think they are, The Lord will clean out his own house first.

The truth, the whole truth and nothing but the truth WILL SET US FREE and will be the only thing that will stand the purification. Let us LOVE all those that hate and persecute us. May we all be on our knees for you and your family, as well as those brothers and sisters that are lost in darkness.

Glenn Beck  
If you want something you've never had.  
You will need to do something you've never done.

'every leader is telling a story about what he or she values in the way they behave. When leaders choose to be positive in the face of intense adversity, the story tends to be widely shared, and often repeated.' Walt Disney



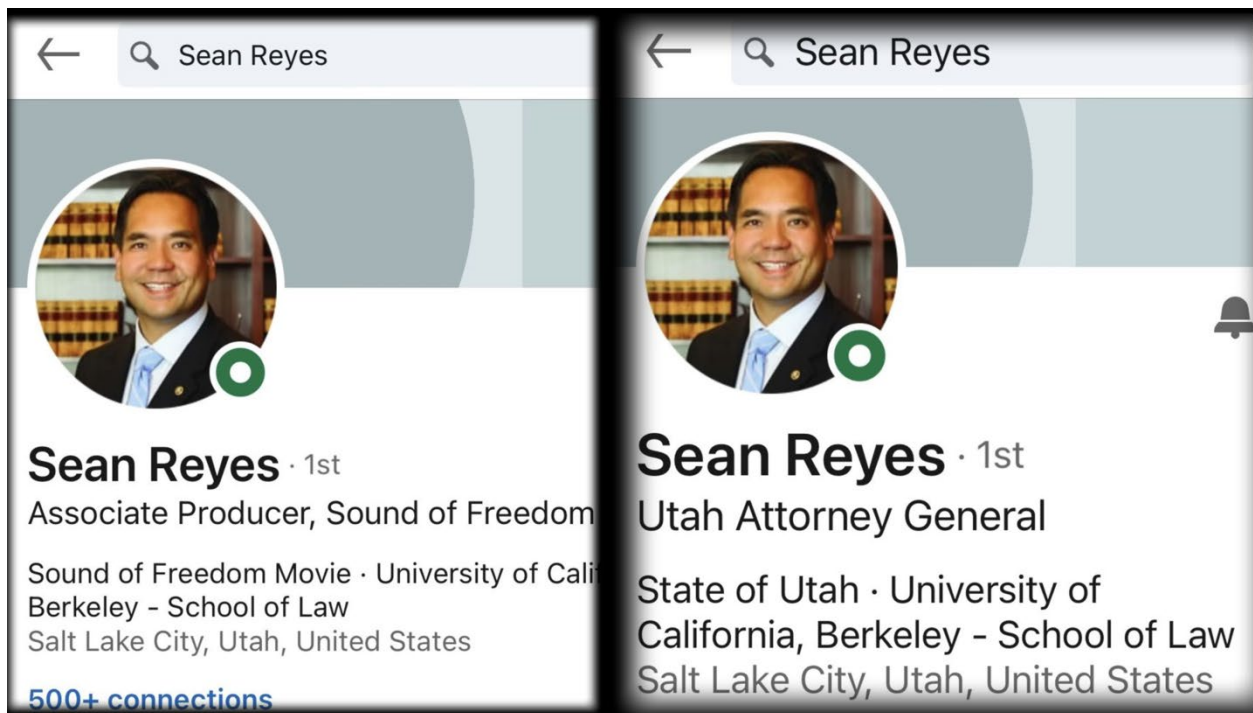
80. Since learning of Ballard’s implementation of the COUPLES RUSE, Glenn Beck called it “really bad stuff” and feels duped by Ballard.

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

82. 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.

83. 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.

84. Attorney General Reyes being listed as an associate producer.



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



86. 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.

87. 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).

88. 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.

89. 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.

90. Ballard used OUR and its OPS to fund his personal fantasies of grandeur.
91. Ballard began a program for women accompanying him on OPS and called the program "THE COUPLES RUSE."
92. 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.
93. 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.
94. 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.
95. Ballard claims that he implemented strict rules regarding the COUPLES RUSE: no kissing on the lips and no touching or exposing private parts.
96. Ballard soon began abusing the COUPLES RUSE and eventually used the ruse as a tool for sexual grooming.
97. 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.
98. 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.
99. Ballard encouraged female operatives to participate in tantric massages before and

while on a COUPLES RUSE.

100. 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.

101. 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.

102. OUR's president Matt Osborne, and others from OUR, also participated in the COUPLES RUSE with escorts in a 5-Star Mexico City hotel.



103. General Reyes participated in foreign OPS where the COUPLES RUSE was being implemented where he stayed at the same safe house as Ballard and his “ruse” girlfriends, and was aware of the COUPLES RUSE, which given that General Reyes is the highest law enforcement officer in Utah, validated that the COUPLES RUSE was a legitimate law enforcement tactic.

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

105. 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.

106. 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.

107. 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.

108. 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.

109. 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.

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

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

112. 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.

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

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

115. 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.

116. 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.

117. 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.

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

119. 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>3</sup>

120. 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 donor had entrusted to OUR or be caught or killed by the cartel.

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

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

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

124. 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.

125. 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.

126. Ballard would also claim that a passage from the Book of Mormon, in which a

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<sup>3</sup> In the mind of the victims, this was very real and serious as the cartel was essentially all knowing and seeing.

man kills another man on the promptings of the Holy Spirit, demonstrates that sometimes the Holy Spirit asks people to perform "unconventional" tasks.

127. 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.

128. 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.

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

130. 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.

131. 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.

132. 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."

133. 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.

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

135. 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.

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

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

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

139. 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.

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

141. OUR terminated Tim Ballard.

142. 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.

143. 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, and Ballard would take a very lucrative severance agreement and remain the face of OUR so it could continue to raise money. *See* Exhibit O.

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

145. 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.

146. OUR remained silent, using his face and the worldwide 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.

147. Rather than turn Ballard into the police for his criminal conduct, OUR paid Ballard \$618,000 and gave him a Jeep Grand Cherokee to resign from OUR. *See* Exhibit P.

148. Upon belief and suspicion, Ballard was given full discretion to the content of his resignation letter, was given editorial discretion over OUR's statements about his departure, a consulting agreement to continue working with OUR by paying money from OUR to Liberty & Light and giving Ballard control over who the new CEO of OUR would be. *See* Exhibit Q.

149. 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.

150. After the initial filing of the lawsuit, OUR did not step up and accept accountability for its actions that allowed Ballard to grow as a sexual monster, but rather issued a press release targeting the only female lawyer on the legal team that represents the Plaintiffs, and without disclosing to the public its behind-the-scenes damage control measures, nor publicly denying any of the specific allegations.

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

152. 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.

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

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

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

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

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

158. 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)**

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

160. 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.

161. 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.

162. 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.

**SECOND CAUSE OF ACTION**  
**(CONSPIRACY TO COMMIT BATTERY AND SEXUAL ASSAULT BY ALL PLAINTIFFS AGAINST DEFENDANTS BALLARD, OSBORNE and COOPER)**

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 of Defendants' management and board members.

165. 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, using the COUPLES RUSE doctrine fraudulently for sexual gratification and not for any legitimate purpose of OUR.

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

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

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

169. Upon belief and inquiry, it is believed that Defendants Ballard, Osborne and Cooper conducted such actions in an ultra-vires fashion from their positions at OUR, though OUR was certainly negligent in allowing it to happen once it realized what Ballard was doing.

170. 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.

171. 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.

**THIRD CAUSE OF ACTION**  
**(FRAUD BY ALL PLAINTIFFS AGAINST DEFENDANTS BALLARD, OSBORNE and COOPER)**

172. 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.

173. Said Defendants made fraudulent statements and actions based upon the COUPLES RUSE.

174. Said Defendants' actions and statements towards Plaintiffs were fraudulent and were done for their sexual gratification and pleasure.

175. Said Defendants made representation(s) about the COUPLES RUSE, who approved it and how it helps in fighting human trafficking, which were false, and said

Defendants 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 Defendants could act out his sexual proclivities.

176. Defendants knew that the Plaintiffs would act on their 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.

177. Upon belief and inquiry, it is believed that Defendants Ballard, Osborne, and Cooper conducted such actions in an ultra-vires fashion from their positions at OUR, though OUR was certainly negligent in allowing it to happen once it realized what Ballard was doing.

178. As a direct and proximate result of the wrongful conduct and frauds 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.

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

**FOURTH CAUSE OF ACTION**  
**(INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS BY ALL PLAINTIFFS**  
**AGAINST DEFENDANTS BALLARD, OSBORNE and COOPER)**

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

181. 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.

182. The conduct of the Defendants Ballard, Osborne and Cooper, as set forth herein,

was outrageous and intolerable in that it offended the generally accepted standards of decency and morality.

183. Upon belief and inquiry, it is believed that Defendants Ballard, Osborne and Cooper conducted such actions in an ultra-vires fashion from their positions at OUR, though OUR was certainly negligent in allowing it to happen once it realized what Ballard was doing.

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

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

**FIFTH CAUSE OF ACTION**  
**(NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS BY ALL PLAINTIFFS  
AGAINST ALL DEFENDANTS EXCEPT BALLARD)**

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

187. 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.

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

189. 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.

190. 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.

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

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

192. 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.

193. Said defendants negligently allowed Ballard to continue and develop The COUPLES RUSE as an institutional doctrine of OUR and its affiliated companies and was done with the knowledge of Defendants' management and board members.

194. 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.

195. 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.

196. 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.



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

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

198. 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.

199. 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.

200. 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.

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

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

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

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

204. 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.

205. 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.

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

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

207. The Board Defendant are members of the board of Defendant Operation Underground Railroad.

208. 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.

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

**TENTH CAUSE OF ACTION**  
**(FALSE IMPRISONMENT BY ALL PLAINTIFFS AGAINST BALLARD, OSBORNE and COOPER)**

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

211. In conducting the COUPLES RUSE, said defendants were willfully detaining Plaintiffs, without their consent, without the authority of any Court order or law and under false premise.

212. Said Defendants' imprisonments of Plaintiffs were false and manifested a knowing and reckless indifference toward and a disregard of the rights of the Plaintiffs.

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

214. As a direct and proximate result of the wrongful conduct of said Defendants, 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**  
**(NEGLIGENCE PER SE BY ALL PLAINTIFFS AGAINST ALL DEFENDANTS)**

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

216. In conducting the COUPLES RUSE, defendants were knowingly and willfully trafficking the participants in violation of Utah law.

217. Utah Code Ann. § 76-5-308 provides that "an actor commits human trafficking for labor if the actor recruits, harbors, transports, obtains, patronizes, or solicits an individual for labor through the use of force, fraud, or coercion.

218. Defendants trafficked the Plaintiffs for Ballard's own sexual gratification.

219. 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.

220. 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.

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

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

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

223. 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.

224. 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.

225. 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 2<sup>nd</sup> day of November, 2023.

**ALL UTAH LAW PLLC**

*/s/ Suzette Rasmussen*

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Suzette Rasmussen

**GREEN LAW PLLC**

*/s/ Michael K. Green*

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Michael K. Green

**MORTENSEN & MILNE**

*/s/ Alan W. Mortensen*

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Alan W. Mortensen

Lance L. Milne

Christopher J. Cheney

Joshua S. Ostler

## **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, 2021, Ballard responded via Instagram and invited WW to his office in Lehi [525 Sunrise Way] 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 because 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.” He also said, “I feel like you have to be hand selected from God because there are so many I can’t trust. We have thousands of applications every week, but I can’t just bring in anyone.” To be honest, I felt pretty important and believed him.

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 Matt Cooper.

Ballard texted WW from a phone number that 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. He also gave her money to buy name-brand “slutty” clothes for the character. Brad had given her some cash for this. Brad also mentioned to WW that he and Ballard thought that WW would be a great speaker, and WW responded that she had always wanted to be one.

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 female 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 cause.

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

On April 28, 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 if 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 previously, 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 operator 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 April 30, 2021, I am looped into a group text and Ballard tells WW that the two of them need to go get spray tans as part of their cover.

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, 2021, OUR employee, Mike Porenta, made all the arrangements for WW to fly out to Dallas, Texas.

WW and Ballard stayed at 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 he 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 her 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." WW *was* burning up and was shaking. WW could barely walk from shaking due to what had 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 in Spanish, 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. Ballard 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 so 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 have let it go too far, to which WW again felt bad for doubting Ballard, and she 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 of it.

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 she 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 that 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 the 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, thanking her 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 her experiences with Ballard, and her boyfriend at that time (her current husband now) 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, K.M.

Ballard was pretty persistent about WW coming back out, even though she told him no

several times.

Ballard told her she could maybe do a secondary, but then after thinking about it, 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 he was going to have future training for it and to watch for it. He said 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 sent her a text in July, 2021, telling 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 operators for other operations, so 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 Ballard and the organization were turning things around. They had the cameras follow her around a lot.

She gave them an interview, and Ballard told people she would be the face 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.

DM told her she went to meet with Coop and Tim to be considered for the position of female operator, but things happened, and DM 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 that Tim had pushed her up against the wall and licked her stomach, and then went out on a fake op practice at a local strip 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 Ballard 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 that no one knew of, and he told WW that he was starting to do his own OPS.

WW didn't go, and kept asking the status of the OP that they had gone on, and if they had rescued any kids?

Ballard kept telling WW that it just takes 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 prior to this, but thought she couldn't trust anyone. She 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**

### **STATEMENT OF D.S.**

#### **Why Now?**

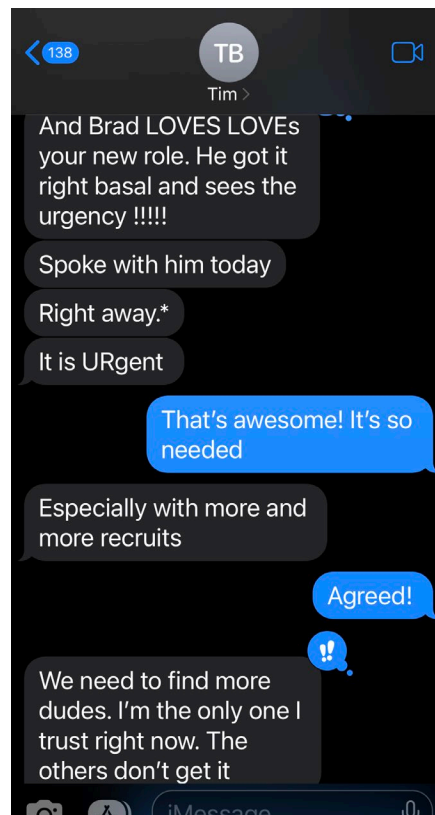
I feel compelled to participate in this lawsuit because no one else had my back when I needed it most, and the way I intend to right that wrong is to have my own back while simultaneously advocating for countless others who have been harmed while Tim continues to denounce the truth and skirt the consequences. This is not a matter of revenge, but a matter of justice and love. “Allowing people to face the consequences of their actions is a true act of love. That’s how we learn, that’s how we develop resilience, that’s how we wake up to the need to work on ourselves” (Dr. Nicole LePera, @the.holistic.psychologist).

I could never have anticipated being part of a legal battle and have lived so that I wouldn’t need to be. Even when I have been terribly wronged, abused, and robbed in my past, I have walked away quietly with my head high and moved forward in a different direction. In this case, I cannot in good conscience or integrity walk away or hide, though I would far prefer to if I didn’t feel this responsibility. I am a lover of truth and will use it to protect and defend others at all personal cost. With the same passion for the cause for which I was willing to risk my life going undercover to expose human traffickers, I now lay down my personal comfort, safety, time, relationships, and reputation to voice my experiences and allow truth to unfold.

The timing of Tim’s behavior coming to light is exactly as it had to be. Anyone who has previously tried to open the curtain has been crushed. I was told I would be as well. Those who have revealed truth at the expense of Tim’s image were labeled traitors to the good cause and to

Tim personally—who has enough clout and devotees that he is often revered as infallible and has proven to be invincible to date. I was told this “nobody mom with four kids from Utah” wouldn’t be considered credible. To the extent that I could speak and be heard, I always have and will.

I began speaking out about the mistreatment of operators in April 2022 after a traumatizing operation. When I spoke with Tim about it, I immediately began working with OUR executives to create change and care for operators. Based on what I outlined, OUR offered me a position to oversee operators, but it never fully materialized.



Within a few months, I learned that Tim was even more mentally and morally degenerate than I had been aware and had since abused other operators. A few of us proceeded carefully as outsider-insiders to put an end to Tim’s behavior and ability to do harm, while safeguarding ourselves and the cause we supported. In October 2022, I personally experienced what I believed

to be criminal behavior and received Tim's backlash when I called him out. I also informed Coop about it.

In April 2023, I received information that another female operator had filed a claim for sexual misconduct. OUR began an investigation and each woman willing to testify did so with great hesitancy, intentionally and cautiously acting in integrity to protect the organization (to prevent the cause from being publicly tainted) and Tim's public reputation (as the face of OUR). The concluding report was detailed and indisputable enough that the board unanimously agreed Tim had to step down. The board (stacked with Tim's family and close friends) reached a settlement that concerned many of us since it allowed Tim to separate without assuming full personal accountability or giving him any impetus to receive the help necessary for behavioral change. As predicted, Tim was instead emboldened to continue his destructive path through new avenues and funding while publicly slandering those he had victimized.

The board of OUR failed in its responsibility to uphold its mission and values regardless of status, influence, or fear tactics. We warned OUR's attorneys that failure to hold Tim accountable would cripple the efforts and intent of anyone sincere about protecting those who have been harmed and silenced in the hands of predatory, lucrative, dangerous men.

In the interest of and protection for all involved, we made every effort to maintain silence to the press and public regarding the specifics of Tim's behavior and names of women abused. Despite our efforts, the press eventually got word of the investigation and drew it to public attention. Tim had not indicated a Senate run until—conveniently—the day before the press printed the leak about the wrapped investigation into his sexual misconduct. Tim malevolently linked his political announcement with allegations investigated and verified long before, inciting



public anger and demand for Tim's victims to step forth and defend ourselves—which has led to further victimization, especially without the resources for personal and/or legal protection. I have never wanted to disappear from life this badly. It has been inexplicably debilitating to be so vulnerable, unsafe, and uncertain—and this is coming from a woman who dines with traffickers and cartel with intent to betray them.

Rather than taking accountability or humbly making amends, Tim blamed his victims of attempting to ruin him without cause. Through his denials, Tim has divided families and friends, church members and political allies. Any man who has left devastation and destruction in his wake, and continues to vehemently lie and slander, should be compelled to make recompense when he has refused to do so voluntarily. Tim has spent years in luxury, traveling in fame and power, living out his delusional and sexual fantasies, while people he has used to get there remain unprotected, afraid, financially ruined, and struggling to survive on multiple fronts.

To those who naively excuse Tim's atrocious behavior as a matter of consent, of simply walking away, I am glad for your good fortune of never having been lured into an abusive relationship. When it comes to understanding the extent of predatory behaviors and grooming, the issue of "consent" is irrelevant. The very definition of grooming is the process of securing a target's trust and manipulating that to get them to agree to things they would never otherwise consider. That's what master manipulators do; they get you to conform to their beliefs and tactics, making the absurd seem normal and you seem absurd.

Did I know at the time that I was being manipulated and lied to? Of course not. Did I know he was doing the same thing with other women? Of course not. He had convinced me (as I now know he convinced each of them) that *I was the only one he could trust to operate with him.*

*I was the only one who could see things as they really were. I was the only one he knew would not permit him to cross boundaries; the only one who could be trusted to protect him, even from himself. I was the only one whose perspective he valued. I was the only one to whom he had felt a spiritual connection. I was the only one who could be as convincing as I was in the role I played. I was the only one who he was sure would not betray him...*

Tim made me believe I was so special to him, with “academy-award winning” performances, that I was “the golden standard” among operators, called by God for this specific time. (I still want to believe that I was. Maybe that calling was to eventually expose the patterns that have hurt countless people and to pressure him into his own recovery.) This continued “love bombing” cemented in me a desire to do whatever was needed for the cause of saving children since I believed I was a rare operator who could. As I now know, he was grooming others with the same praise and placing a heavy feeling of trust in their unique relationship.

I worked closely with trafficked women who didn’t know they were trafficked. Tim can tell you specifically how their pimps lay it on so thick, telling them that they have the option to leave but they know well the repercussions if they try. Was it consensual? No. That’s what grooming is. It’s all of what takes place outside of and surrounding the very moment that you’re acting in the situation you’re being prepared for. It’s the ideas, justifications, lies, and threats that convince you it’s worth anything/everything you’re doing. It’s the level of close connection he repeatedly insists you have. It’s the trust he instills in you and the “secrets” he’ll share so that you’ll trust him back. It’s the understanding of the fragility of the relationship and situation and the ramifications that form a brainwashed bond to ensure that **even when he tells you that you don’t have to do what you’re not comfortable with, you do. And you need to get**

**comfortable with it real fast.**

It's the insistence that he trusts your spiritual level and intuition to guide him, effectively shifting to his victim a false power, security, and responsibility to protect the predatory and make sure that he is never hurt or betrayed by you or anyone else. It's the continued reminder that you're in life-or-death situations which could compromise your personal safety as well as that of countless others.

Elizabeth Smart has reported that occasionally people will slide in comments to her such as, "You and I both know you could have left if you wanted to." These insinuations are tormenting for victims of abuse, or anyone thrust into a situation to have to prove themselves. Nobody deserves for me to explain the extent of what I endured so that they can be judge and jury. Only me and my God can sort this out mentally, emotionally, spiritually and physically. I understand now it could take the rest of my life to process and understand the lasting effects. People who have never experienced what I have experienced have no place to weigh in on the credibility of my pain.

This is not about consent; consent means getting what you sign up for. This battle is about **not** getting what we signed up for. This is about having taken unimaginable risks and made enormous sacrifices...not for truth and freedom, but for lies. This is about being conned, gaslighted, and manipulated into believing we were doing something noble, when we were doing little more than providing a sick man an ego boost, power grab, and endless well to satisfy his selfish fantasies. This is about requiring Tim to take accountability for his wrongdoings and to stop profiting by exploiting us and others.

## **My Introduction to OPS**

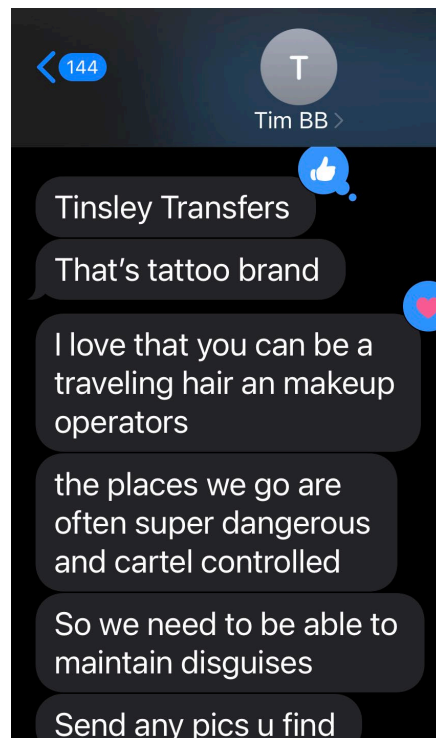
I first met Tim Ballard while working on a film project in 2020 during which he spoke about the power of prayer. I left that day a strengthened testimony of prayer and determination to pray more specifically with greater faith.

A year later, I was working on set again with Tim. He remembered me from our previous encounter and asked, “What’s your story?” I gave him some milestones of my personal journey, including how I had returned from living in Asia and divorced after my husband had fully relapsed into sex addiction. Tim then showed me a video with a lady he had just rescued from Thailand and said that “because we’re not sex addicts” (a line that I kept on replay in my mind every time that I doubted) they could go into dark places and fight those who promulgate the very filth that had caused me such devastation. I felt like he was literally fighting on my behalf.

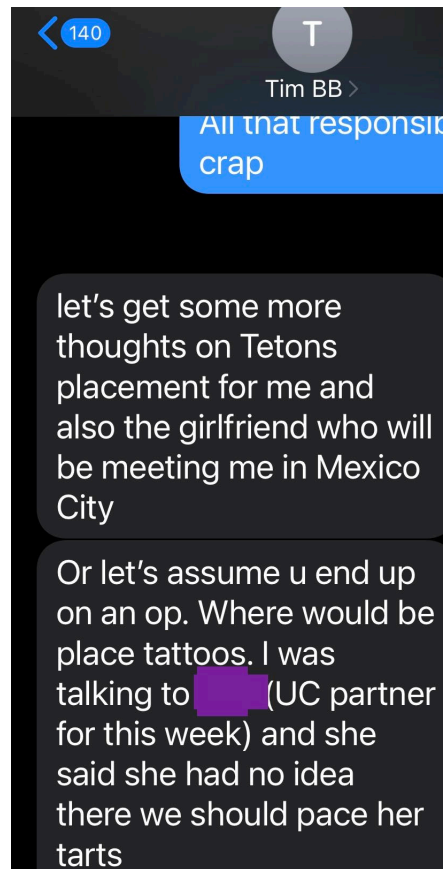
When filming was complete, he said, “You’re a hair and makeup artist, can you do tattoos?” I told him I could, and he asked me if I could also bleach his hair platinum to create a cool So Cal look. He explained he was going on a mission with a fake girlfriend the following week and needed help creating their costumes, then suggested I could help with her disguise as well. She was a police officer and needed some feminine refinement, her makeup done, and help with her hair. Tim suggested it would be great if I could go down to Mexico with them to keep the tattoos looking fresh because sometimes on missions they start to fade and then it puts him in great danger. He looked at David (who had come on set with Tim) and said, “Remember that—when we were (on the op) and my tats started to fade? That was scary!”

He asked for my number, if I had a valid passport, and if I would be available Saturday to get him ready. He said they have the supplies and everything already since he had an

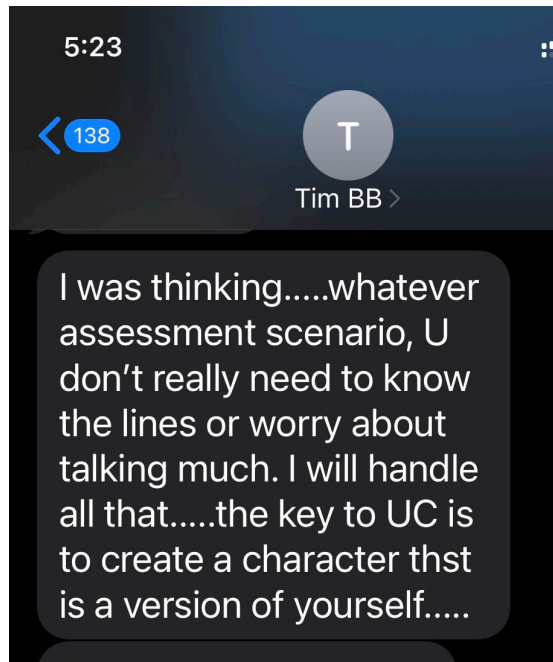
appointment with another hair and makeup artist; he would call her off and get the products from her so I could apply them. (He said the other artist lined up didn't have a valid passport and because of the Covid delays it was almost impossible for her to renew, so she wasn't able to travel with them.



He later texted to work out details for meeting up to apply his tats and bleach his hair. He asked if I would ever consider going out as an operator, mentioning the possibility of having me pose as his girlfriend and testing my comfortability with that. He said he thought I would be really good, and it would make things easier for him because he wasn't really attracted to this other operator and how that could throw off the operation because their relationship isn't as believable. He told me about an operation where he was coupled with a burly female Mexican and had to abandon the operation entirely because he couldn't even fake it with her.



I told Tim I wasn't sure if I could play that part not knowing what it would require of me—how safe it would be, how it might affect me mentally, what I would need to say and do to keep our cover and not screw it up, etc. Tim assured me there wasn't anything to worry about as he would cover for me and do all the talking; it was best for me to be the quiet, reserved, cockblocker. That would be my principal role: protect Tim at all costs. I often told people I was essentially “Tim's bodyguard” with the purpose of protecting both him and Katherine (via protecting their relationship from sex workers, which I believed I could do well because I'm firm in my boundaries, integrity, and intent).



I was extremely excited about being given the trust and chance to participate in something I felt passionate about and could make such a direct impact. But I was very hesitant about the role. What a heavy responsibility for me to do things just right with our lives on the line and no experience in how traffickers work or what exactly I was supposed to do and how that might affect me in the long run. I told him I was willing but unsure if I was the right fit. He said we would start out super slowly, just holding hands around town and such to see if I felt comfortable. That seemed innocuous enough. I could handle that.

Tim asked me to pray about it to see if it was something I felt good about and that we would talk in more detail on Saturday. I had many questions but couldn't believe the opportunity. Later that week, Tim told me he knew when we were first speaking that he had received the divine impression that he "was supposed to ask me about being an operator." This is the same guy who had strengthened my faith in prayer, and I easily trusted he could have received that revelation from God. And I believed it myself. My close friend reaffirmed that I

was absolutely perfect for this role, saying of my personality type that we “are the ones who want to save the world and don’t want anyone to know about it.”

We met up in an OUR office that Saturday and were initially with Coop and a few others who had brought in supplies and Tim’s wardrobe for the op. The others eventually left me and Tim alone as I worked on his disguise, and he seemed genuinely interested in knowing how I felt about life, the gospel, my situation being single, and my perception of him and the works he does.

Tim inquired about my sexuality in light of my spirituality. He was especially curious about how I, as an active member of my church, would see going in on these missions and playing the part. We had lengthy discussion about what actions would be justified by God in this work. Throughout the afternoon and evening, He was impressed that I “got it” and was willing to do whatever was required for the cause and still feel strongly that it would be in keeping with my standards, since my highest standard is to sacrifice everything necessary for the Lord and His purposes—and I could conceive of no greater purpose than to free God’s children in captivity. I was increasingly willing to participate without question of the personal cost.

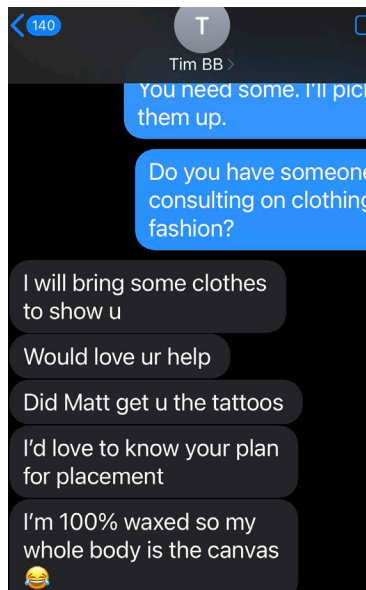
For the next several hours as I worked, Tim began to tell me more about the tactics they use to keep their cover on operations. I had been aware of his close association with Elder Ballard, so it seemed natural when he told me they met on a regular basis to receive blessings and to discuss OUR proceedings. Tim told me of the time he told Katherine he couldn’t do OPS anymore, that the thought of descending into the filth made him sick. Then he received revelation of using a girlfriend relationship (later deemed the “Couples Ruse”) as a cover. According to Tim, he presented the plan to Elder Ballard who thought it was brilliant and



specifically sanctioned the strategy. I could see how going undercover as a couple could be valuable, so it made sense that it would have come from an apostle of the Lord.

I asked various questions about what my role would require. Would I need to drink alcohol (which I had never done)? No, Tim said he never has to drink. He's really good at faking it and told me some of his tricks. Would I have to swear (which I also didn't do)? Yes, I could practice it (that evening, Tim asked me if I had practiced saying the "F" word in the mirror). What was my physical risk? Would I ever be in a situation alone with traffickers or where another man would be expecting me to be sexual with him? Tim responded that our roles were to protect each other from exactly that, so we would only need to be sexual with each other and only to the extent necessary to the situation. Of course, we would abide by strict standards and need to be able to both connect and trust each other.

Tim confided in me many "secrets," like that he had just gotten a full body wax for the first time and asked if I ever had, saying it's so much more appealing and he wishes Katherine would.



He told me to go shopping and get sexy clothes so we could test it out this next week if we got the chance. We were in frequent contact through the weekend. He asked me to send shots of the sexy clothes I got and screenshot tattoos and placements I was considering.

Plans changed and I was asked to leave Monday instead; this would give us more time to “practice”. Tim had asked if I had any concerns and I told him I had plenty, so we planned to discuss them while we were down in MX. He picked me up from the airport in Mexico City alone with a driver who I was assured only spoke Spanish, so we could speak openly and confidentially on our long drive to the home where we would be staying that first night. I shared both my written and mental lists of questions.

My greatest concern was for Katherine and how this worked with their relationship—since the whole point of going in as a pretend couple” was to safeguard his real relationship with his wife by preventing him from having to do heinous acts with victims of trafficking. I wanted to know how he had been able to keep emotionally stable and not blur the relationships. He assured me this was the best thing he could do for his relationship. Katherine knew it too. She helped choose me! He said that they always decide together who should go on these operations, who fits the part as a legitimate partner for him with the right look, height, and spirit. He said he had shown Katherine my picture and she felt strongly about me, agreeing I was the one.

As for making sure the role play doesn’t turn into real play, Tim said there were strict rules: No kissing on the lips because that makes it too difficult not to create a real attachment. No undressing or touching private parts. No texting, calling, or continuation of the role outside of the OPS. These stated standards helped me feel so safe about keeping that distinction and I was thrilled to know that he took this seriously for my protection as well.

Apparently, a previous operator had insisted on calling him and trying to see him after the op because she got too connected and couldn't let him go. He adamantly reminded her that they weren't in a real relationship. He couldn't work with her anymore after that. He told me about how he and another female operator, a big-time actress, were in a situation where they were staying with the trafficker who brought into their bedroom 10-12 minors to dance for them for them and sex play. To avoid the minors, this actress and Tim lied on the bed, pretending to make out and have sex, complete with fake orgasms and a shower afterward...to convince the trafficker they had actually had sex. After playing the role the woman was so legitimately horny that she had insisted on kissing him on the mouth, saying it was not fair to get her so worked up and then leave her hanging. Tim was furious and reminded her of her place. Because of that, he could never work with her again. She was so upset at not being included in future OPS. (The following year, Tim told me he was considering having that operator come on another op with us—and ultimately did—because she now has a boyfriend and is promising she's in a more stable place, wanted to prove she could handle it now, and pleaded for another shot.)

The way Tim verbally attacked previous operators and people who “betrayed him” (which meant anyone who stood up to him, including the CEO, other directors, or women who dared questioned him on ops) was a regular lesson on how I was expected to behave in order to work with him—and I took note. Initially, the expectations of our conduct were not printed, but Tim took video of us after the op “for both of our protection.” He had learned this the hard way because he had been accused in the past of acting inappropriately. Tim recorded that I had treated him appropriately and with respect and asked me whether he had done the same. In time, Coop wrote up and asked for signatures, calling it a Couples Ruse Agreement. (Notice Tim's

signature was not required.)

**OUR Undercover Operations: Couples Ruse Agreement**

**Couples Ruse**

The "Couples Ruse" is a Cover for Status and Cover for Action technique employed by OUR undercover operators. It will require a male, female pair posing as a couple under a false pretense that they are romantically involved. The couple will create the appearance of being romantically involved as they deem appropriate. The Couples Ruse will be used by OUR operatives to infiltrate human trafficking criminal networks. The operators will use their status as a couple to engage traffickers and trafficking victims without abusing victims or engaging in harmful illicit activities where male operators would normally be expected to do so. The Couples Ruse has proven effective in allowing OUR operators to gain access and intelligence into trafficking organizations.

**Couples Ruse Limitations**

The undercover operators Timothy Ballard and [redacted] will not and have not engage in the following acts with each other during the operation in Cancun Mexico, Cozumel Mexico, and surrounding areas on 06/19/2021- 06/24/2021: Kissing on the lips, Touching or exposing private parts including Breast and Genitalia.

**Acknowledgment**

By signing this Agreement, you acknowledge you understand the Couples Ruse, its limitations, and that both persons participating in the couples ruse will not violate and have not violated the limitations of the Couples Ruse as defined in this agreement.

OUR Operator Printed Name

[redacted]

OUR Operator Signature

DocuSigned by:  
[redacted]

Date [redacted]

Witness Printed Name

Matthew Cooper

Witness Signature

DocuSigned by:  
Matthew Cooper

Date 6/20/2021

We arrived at the home of a wealthy politician where we would finish getting ready and stay the night. Tim had attended to most of my concerns and now it was his turn. He told me how risky this whole situation is. More than just that my life would be in danger (which he didn't seem to take seriously and in time it would be little more than a joking conversation about how we would die and that in fact he said he thought dying on an operation would be a cool way to go), he was taking a very serious risk by bringing me along. He told me how important it was

that I never say anything about what we're doing because I could literally ruin him. He seemed distressed as he asked, "Can you imagine what the response would be if you told people, 'I went on an op with Tim and he was all over me' or anything like that"?

I repeatedly assured Tim I would never ever say anything. He expounded that if I ever talked about what we were doing, he "would have to deny it." I told him I understood. Tim continued talking about how it would appear to people who wouldn't understand...and I fervently agreed it could easily be misconstrued. Tim drilled into my mind that he would have to use every resource he had to fight anything negative I might say about him and that of course he would be sided with. I knew that. It didn't matter. I was resolved that I would never ever betray him! By this time my heart was aching at the thought and my eyes welled with tears. I told him, "I could never EVER say anything that would hurt you or the cause! That would be sacrificing everything I believe in—everything important to me about my own good character and all the good that OUR had done. It would be sacrificing the lives of innocent victims that I am willing to lay my life on the line to rescue. That would be so devastating to me personally that I would rather die than falsely accuse him." Tim commended me, saying he had no doubt that I was sincere and trustworthy.

I trusted him too—just by virtue of him being Tim Ballard.

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 seemingly concerned about compromising the temple covenants he 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

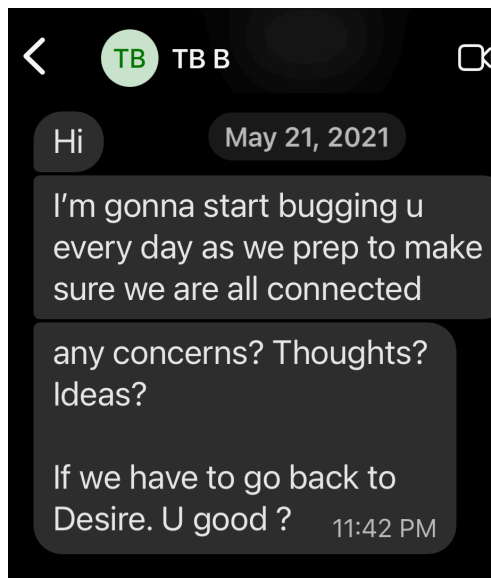
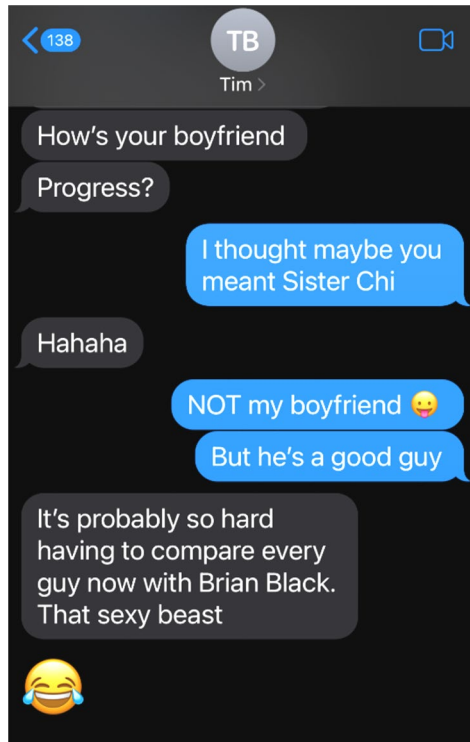
cheat on Katherine.” His concern caused me, as a natural comforter, to engage regularly in this pattern of conversation:

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 unique way that God has trusted us to do, right? 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.

What I didn’t understand then was the real reason for Tim’s constant concern and need for reassurance—he was behaving with impure intent. He 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 simultaneously 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 Tim’s degeneration into moral decay, mental illness, and harm to himself and countless others.

Over the course of our many OPS, Tim touched me repeatedly, trying to create a sexual connection by the words he spoke and the ways he touched. He was constantly feeling me out and trying to turn me on as well. Tim frequently asked about my sex life, what most arouses me, whether I masturbate, what I’m willing to do with my boyfriend, etc. Tim also admitted to some jealousy about guys I dated and feeling rejected when I didn’t respond to his touch as 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 traveling alone or

staying in a private place.



Tim spoke often about the disconnects in his relationship with Katherine (Tim's wife)

and I became a crutch for him to confide in and offer advice. It was often in regard to his sex life and wanting her to think more openly and be more exploratory (she was apparently not willing to wax or have oral sex, and “I’m *really* good,” he said).

Tim frequently asked with bewilderment, “Why are you still single. On the first “mission,” he said, “If anything happened to Katherine, I’d marry you.” He really pressed to know if I would feel the same. I told him, “We’re not going to have this conversation.” On another occasion, almost a year later, he said, “If I was single, I would marry you.” One of the donors with us on a separate trip mentioned that he had said this about the Ukrainian operator as well. And clearly, Tim said it to (REDACTED), then denied it and made horrible accusations about her wanting to marry him.

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. When I broke my foot on a “training” in Budapest and was not able to go on OPS for a while, I lost that revenue stream, as well as the ability to run my home and business. Being unable to walk was financially devastating. There were many other times of team disorganization and neglect, including when another female operator and I were left at a large home in Mexico all night, unprotected and forgotten by anyone else on the team. She left the next day, but still no one came for me. Fortunately, Tim and a couple others stopped back at the house to grab something forgotten; they were completely surprised I was still there.

On the OPS, I was an afterthought—like I wasn’t really supposed to be there. I felt like I was risking and sacrificing for something that was becoming clearly about creating a story and not about putting together strategies to rescue. (Eventually, Tim began to say our responsibility



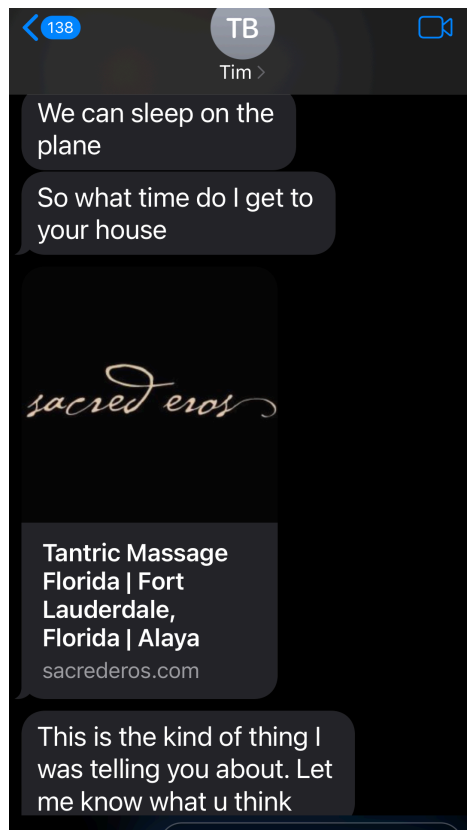
was to be “storytellers” and man, could he spin up a story!) No one seemed to need or care about the intel we gathered. My experiences and perspectives didn’t have a landing place; no one would know who I had spoken with in the places we visited or what I had seen and heard. I didn’t know if any of our efforts (or the supposedly “valuable information” we gained) had led to anything worthwhile. Tim spent very little time explaining the missions, targets, or victims, and an excess amount of time discussing all things sexual. I never really knew what we had actually accomplished other than achieving “chemistry” and being convincing to usually no one in particular.

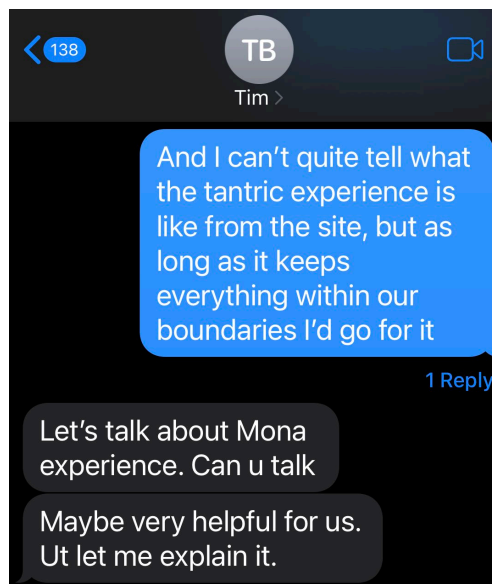
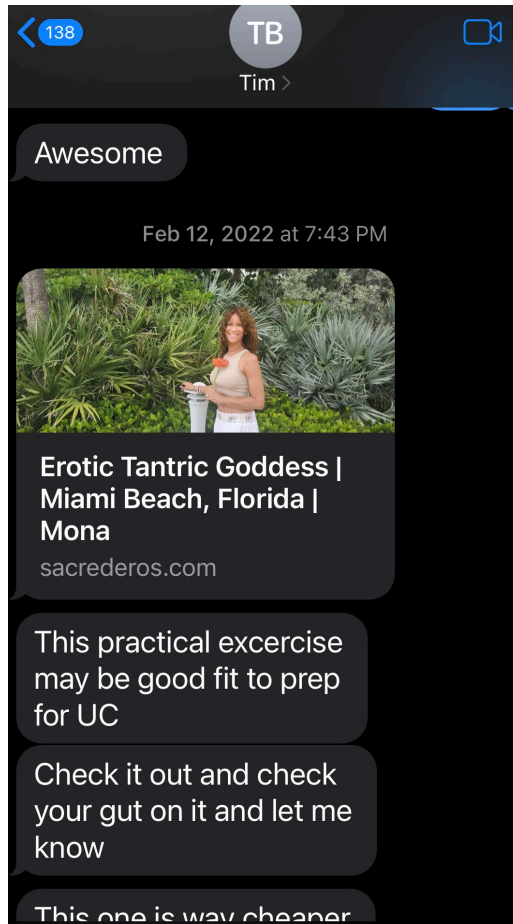
Tim also became increasingly sexually perverse and aggressive. At least twice I was afraid when he was on top of me and dry humping on a bed. We were alone in a hotel room the first time he did this, after which he went into the bathroom and masturbated. On another occasion, I was scared and unable to tell him, as he had become aggressive, grinding determinedly trying to come. When I tried to move away, he pulled me back under him.

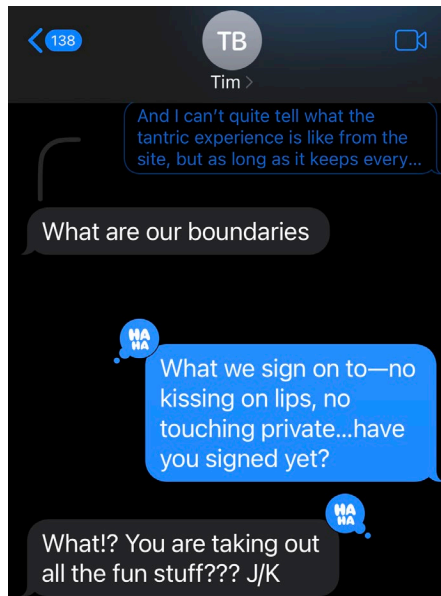
As we were preparing for an operation and staying in Miami, Tim wanted time to “practice” and reconnect since it had been a while. One evening he became demeaning and insistent that I meet him at the hot tub. I met him there late at night, alone, when I would rather have gone to bed but knew he would be upset if I refused. Tim began telling me all about the tantric massage that he and another operator experienced in CA. He said she had learned a lot and was excited about what she could do with it in her marriage. Tim had learned some techniques in tantric that he wanted to show me. He said, “I’m going to do something. I promise I won’t touch you. Trust me.” He moved his hand up between my legs and pressed his finger just behind my vagina, tapping firmly six times, which he explained awakens the sexual chakra or

something that that effect.

He frequently talked about doing a tantric massage with him and other “more intense” practices than we had done previously to “level-up our game,” insisting that undercover work was “a perishable skill.”







He began drinking regularly on OPS, justifying oral sex, nudity, and bed sharing with each other, creating situations precarious enough that he could vehemently argue these actions were necessary to accomplish the mission and retrieve information that would make all the difference in saving countless lives.

Tim kept saying we needed a more intensive training than we had done before and said Coop had made all the plans so that Tim and I would both be surprised. He had scheduled a trip to FL for this “special training” (where we would be meeting a Ukrainian operator), first routed through NY for a “surprise appointment” for just the two of us. Tim had been trying to arrange for a sexual massage for quite some time and was infuriated when our flight was cancelled and could not be rebooked, even on another airline, to get us there in time for the appointment. Mike arranged for a midnight flight direct to FL instead, thankfully skipping JFK, so Tim and Coop spent hours scouring Salt Lake City for a place we could get a sexual massage that day. When the first place failed, Tim yelled at Coop over the phone to find something. Coop drove us from place to place, but they were all full. Tim was relentless, offering women at the desks up to \$500

to get us into a room.

He finally found a sketchy massage place where he was demanding enough that the therapist allowed us to squish together onto a single massage bed so she could rub us both at the same time. Tim was persistent about asking her if she could do a Nuru massage or bring in someone who could, and he tried to get her involved in any sexual talk he could elicit. She did offer him a hand job if he wanted. He asked her if she ever got sexy with her clients and teased her about taking off her shirt. Tim kept acting like this all of this was part of a training designed by Coop and they were handing me mini “missions” to accomplish. This time, on the bed, Tim gave me the assignment to get the massage therapist to strip down for us. I refused as if he was joking. He was not. That seemed criminal to ask of an innocent bystander to our “training.”

When we finally left (before Tim was ready to, but because we now had limited time before our flight) I called him out about asking me to corrupt her. He shot back, “She’s anything but innocent...she was willing to give me a hand job!” He spoke disparagingly about me when Coop picked us up, telling him I had “gone soft.” For the remainder of the “training” trip, Tim didn’t have much of anything to say to me, including having me participate in any further training...which was supposedly the whole point of the trip. I didn’t participate in anything essential or unique and spent those FL days primarily alone; Tim specifically left behind at the house rather than taking me to visit Tony Robbins as promised. It was clearly my punishment for pushing back on and questioning his instructions. I told Coop about the incident with the massage therapist, and he was definitely very concerned...but there were no repercussions for Tim.

I now see many contradictions between how Tim protected himself, with little concern for

me and others, while creating in me a determination to risk everything to protect him and “us” as a partnership and OUR as a whole.

- It’s ironic that he claimed it took him a while to detox from “Brian Black” mode (Brian Black is Tim’s alias)—which was often his excuse for a foul mouth or inappropriate behavior—but he wasn’t concern that other operators might need to as well before returning home and getting back to “real life.” I wasn’t offered any help, therapy, or almost any contact between operations.
- Tim has become a hero by proclaiming how he puts himself in real danger, but he was discrediting other operators, including myself, who took on the same risks. For example, consider the statement put up by Spear Fund
- Tim enlisted top stylists and Hollywood-level help to get disguised but was not concerned about other operators being exposed, even if it meant we couldn’t return back to the country in the future with family or friends. When my identity was directly compromised with cartel, Tim dismissed it as a non-issue saying it would be dangerous if it was him, but not for me.
- Tim believed his family needed help and protection while he was away, but others didn’t (despite that I’m the only one my kids can rely on to provide and that we’re side by side going into the dark and risky places).

I’m not stating this for sympathy or accolades but to express the pattern of Tim’s inability or unwillingness to acknowledge and/or attend to the needs of others, including those of his partners and team. I felt extremely unprotected in every way. Tim would remind me to turn in my expenses and get paid after these operations, saying “that’s a lot of money!” As though I would be compensated well (...after all, Tim was highly compensated). But that was not the case.

I was initially offered \$x/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 physical/emotional/financial 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 \$x/day, less than my professional day rate (which doesn't demand all-night work, time away, and personal risk, let alone require me to be randomly available for the unpredictable travel schedules and follow-up missions).

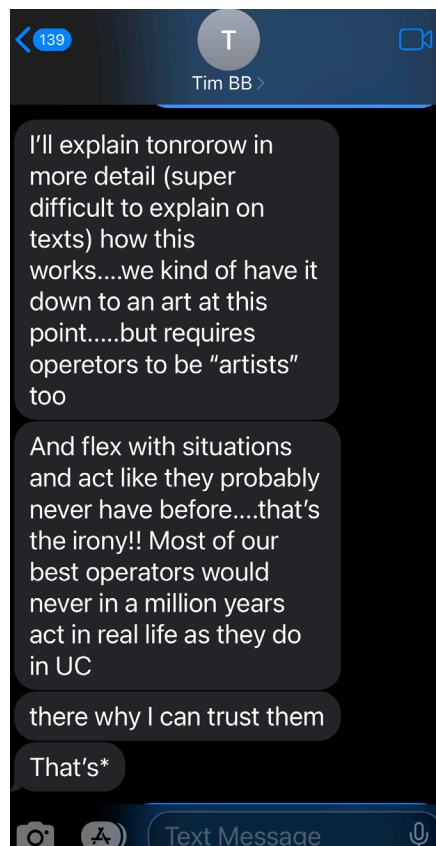
Tim greatly facilitated my mindset that compelled me to consider doing what I did. He told me that after we met last year, he remembered me and would have known me if he had seen me at the mall or in any crowd. He meets hundreds of thousands of people, but he would have known me. With me, he said, there 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, 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 had a relationship in a past life, perhaps we were married or something (which he questioned Janet about, and I wasn't surprised because he had shared with me how she had revealed many things about this principle of recycled lives) or were soul brother/sister.

I loved the cause and mission of OUR enough that I was willing to excuse a lot with Tim's justifications and convincing. But after my experience in the DR, I could not run fast enough through the airport to get home. I was physically and emotionally ill. When Tim asked me to speak to and encourage potential operators, I told him I wouldn't feel comfortable with

that until there was some reform. Sadly, it could never happen with him at the root of the organizational problems.

## Deception

I understood the tactic and risks associated with the Couples Ruse as far as it was written and required. The spoken and understood Agreement kept me safe...until it didn't. Tim began pushing all boundaries and asserting that behaviors outside of the initial rules were to be employed as needed. **Tim found sufficient reasoning and was very convincing that frequent sexual boundary breeches were essential.** I was led to believe that Tim had been doing this for years, as had the other male operators; I thought it was standard operating procedure as an essential way to protect everyone involved.





What I have discovered in the past few months has been very revealing to me about Tim's real tactics and motives. Until I was able to talk with other women about their experiences with Tim, I did not know the lies he had been telling them about me. What I didn't know until now was that Tim was telling other women (and some of his staff) the same things about me to convince them that he was in need of a new operator who behaved well—I was now counted among those with whom he couldn't work anymore; He told them I had fallen for him, tried to kiss him, and seduced him in bed.

I will not accept being lied about and disparaged when I have risked so much and given so much without asking for anything in return. And I'm not OK with staying silent when someone else is being lied about and publicly disparaged.

I recently received advice to beware of people who are talking about others; they are talking about you too. I am absolutely dumbfounded that Tim would defame me that way. While I was doing everything I could to protect his image, he was smearing mine. I have a solid reputation among those who know me personally; Tim knows who I really am and was still capable of and willing to burn me by painting me as untrustworthy and slandering my character for his own self-indulgent purposes. This outright dishonesty and betrayal proves that Tim insidiously pitted us against each other to prevent us from talking—his manipulative scheme to secure our reliance on him alone. As it turns out, his efforts did not discredit our collective character, but exposed his own. As truth and deception battle, darkness will never overpower light.

## **EVENT LOG**

### **March 2021**

- Tim on set, he tells me he's not a sex addict, (Redacted) tells Tim to "watch it,

Romeo.”

- OUR Lehi office—Hair dye/cut and tattoos. Tim asks about being waxed, being willing without hesitancy to do whatever is required to save women and children, he’s impressed with how open I am to the work and requirements.
- Mexico City—Sneaking out to the guest house to apply tattoos, Tim begins the touching and “practice” of getting physically connected; He feels increasingly connected and asks Janet about our relationship in past lives; asks derisively if I’m “embarrassed” to leave the door open while I’m applying my bronzer in the bathroom. Tim acts “caught” when (Redacted) comes downstairs unexpectedly.
- Cancun time in the ocean, my discomfort with closeness and tactfully 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 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 the separate bed. I refuse. He later tells me how he felt rejected.
- (Redacted) takes me to lunch and berates me for my role. I believed this to be standard procedure and am shocked that (Redacted) is suggesting I’ve done something wrong.
- Massage parlor, minors offering massages, find female trafficker who offers us “whatever we need.”
- Tim recounts stories of deep betrayal from those he had worked closely with, (including a previous operator who insisted on kissing him and he was furious so he can’t work with her anymore), how depression and suicidal ideation had overtaken him, how he has a hard time being home. Asks me to 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 and is saddened when I scoot away from him on the couch.

## **April 2021**

- 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

orgasmed.

- Went to a strip club in the evening, spent an hour in a private room with a topless woman who tried to seduce us while Tim faked oral on me. I had a physical traumatic response when we left the club. Tim held me until I had calmed down. He still wanted to continue “fishing,” so we entered a brothel where they introduced us to a lineup of prostitutes. Tim was deciding who we should take back into a room and asked me who I would choose. I was not up for it.
- Asks me constantly how I manage to separate the feelings and can “turn it off” when we’re not on the town (back in the safehouse) or specifically playing the role of a sexually charged couple.

### **May 2021**

- Mission in MX, planning business venture with female trafficker.
- Island in BVI—Tim asks me for help separating from me while we’re on the island since he feels rejected when I resist his advances. Katherine is brought to the island as a surprise to Tim, who then actively keeps his distance from me for the week until she leaves, revealing that he has blurred our professional relationship. Tim sees and treats me as the “other woman” whom he must dismiss to avoid jeopardizing his relationship with Katherine. The night before we’re to leave to search for traffickers on the other islands, Tim apologizes for his mistreatment and hopes we can reconnect before continuing our mission.

### **July 2021**

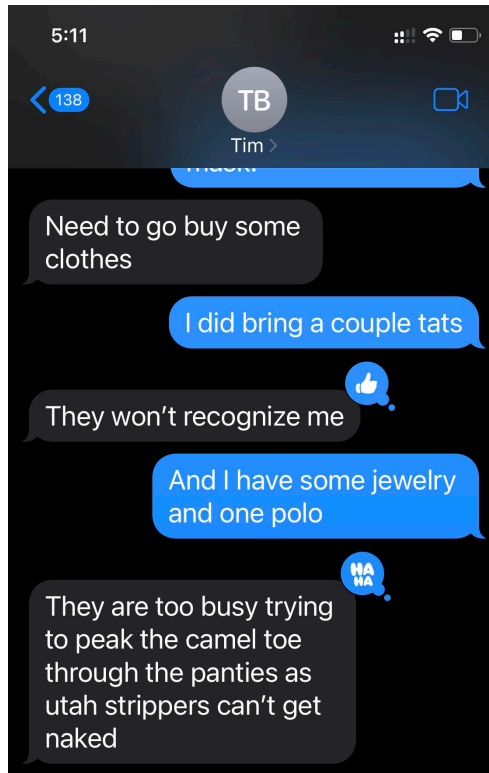
- 5:45am get Tim ready (hair dyed blue/tats/piercings); left at 8am in premier black car service for airport, SLC to Cancun. Happy Shuttle to Breathless, they wouldn’t let us in due to improper ID. Barely missed Riigo’s (trafficker’s) boss, so Tim paid Riigo 12K USD cash to meet us at another place with his boss, then raced to Coco Bongo to meet Riigo.
- Tim tells team he’s backing away from OPS (he’s been saying this for months and I hope he’s serious this time.)

### **Oct 2021, OUR TRAINING**

- First aid, OSINT, HUMINT, dinner, clubs. Tim asks 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.

- Before clubbing, Tim asks me to be witness to what happened in a hotel room with the trainee who tried to seduce him and get him to “finger f---” her. I insist he tell Coop and Matt.
- Tim wants to go to strip clubs in SLC as part of training.



- Actors meeting, role play with students in shifts. Tim talks (with his son present) about the trainee who wanted him to “finger f---” her in the hotel room. Embarrassingly crude with trainees in mock situations.

## Feb 2022

- I'm on secondary team. Tim talks incessantly about the female operator he can't stand being with any longer, how she is pushy and verbose (i.e. she doesn't just go along with everything he says), says she freaked out about the cartel association and he couldn't continue working with her.
- Tim says the other operator refuses to go into cartel territory where we're doing the sting. He asks me to join him on primary. I meet with the trafficker and boy (who

Tim says is the cartel's "Golden Boy" because he looks so young he's in high demand—they can send him out multiple times a day for \$4K/hr. (When I asked a few days later, Tim told me the boy was 15 and had been trafficked since he was 12. They still couldn't find his family. On an operation earlier this year, I talked with the aftercare director there who said that boy was propositioned for that evening by his neighbor and that it was the first time that had happened to him.)

- We do the takedown, the police don't arrest me and instead expose me as an accomplice, as they take me outside and ask me to hand over the money in front of the local swat team.

### **Mar 2022**

- Tim insists I meet him at the hot tub. Tells me all about the tantric massage with [redacted] (an operator), saying said she was excited to take some of the techniques back to her marriage.
- He learned some techniques in tantric and wanted to show me. Tim said, "I'm going to do something. I promise I won't touch you. Trust me." Moves his hand between my legs and presses firmly behind my vagina six times to activate sexual chakras or something.
- Evening in DR at "fantasy house" of suspected trafficker John [name changed]. Continuous rounds of alcoholic drinks, a surprise show with three girls whom John said come regularly to perform with fully revised costumes, choreography, and music.
- Tim tells me the plan: I am to stand in panties at the top of the stairs with drinks until there are witnesses, then summon "Brian" to go to bed alone with me. Some of the houseguests and staff heard me invite and then saw Brian holding me from behind with drinks and warned we would miss the party. Other female operator stays down unaccompanied at the bar to represent us at the party.
- Massage parlor, [redacted] café with the Haitian woman he refers to as his "boss" who is pimped, and her 15yo "daughter" (i.e. not her daughter). Tim lies on bed on the other side of the room divider as we get "massaged" (these massages are always gross mockeries, not real, not clean, and not relaxing).
- More massages at the seedy Haitian place, in separate rooms upstairs, my nice glasses were stolen by the time I got up.
- Evening at John's house. Both women (Russian and Ukrainian) join us in the bedroom. Tim has been heavily drinking, lays out the plan for me to do new boundary break of removing my top, take charge of the time with the ladies (because I'm the "boss"), to push his head down between my legs so they'll believe we're having oral sex. Tim gets completely naked, then sleeps drunk on floor (obviously not protecting me) until he climbs into bed. This night and the night

before were horribly disgusting situations 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.

- John arranges for me to have a private massage in his home. The lady ordered in to give the massage is the same we found previously who had worked on Tim. John is already suspicious about our wanderings from the day before and walks in on us as I'm on the table exposed. I feel compelled to "enjoy" her massage, which includes stroking and violating me until I fake orgasm.

### **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—Tim had me going under false pretenses—with tantric massage before flying to Tampa. Wanted to discuss this genius "new technique [Redacted] came up with" 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. Duh.
- 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. The remainder of the trip, supposedly for training purposes, I am irrelevant—evidence that I had not fulfilled my purpose.

## **EXHIBIT C**

### **STATEMENT OF DM**

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. 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 Matthew Cooper, a.k.a. Coop. 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 28, 2021 I went up to the OUR gym located at 13648 S 200 W Draper, Utah 84020.

When I got to the gym, Coop 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, Ballard 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. He said 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. Ballard's son Blaine was also there doing some training with us.

After the self-defense tactics, Ballard said that he thought we should continue training in a different way later that evening. He said 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. He said 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), Ballard 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 team's job



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

Ballard 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.) We were supposed to pretend like we did not know them when we were at the clubs on our training OP. The 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 Ballard'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) Ballard 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 Ballard and (redacted) at the first strip club. (Redacted) was sitting on Tim's lap and they were all over each other playing the part. Ballard 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 & Ballard 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. Ballard 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 Ballard 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 Ballard and (redacted). They acted out the COUPLES RUSE as well—just more extreme (lap sitting, going into private rooms in the back, 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, Ballard's son ended up coming inside. He walked into the club's back room and saw his dad and (redacted) together like that. It made me extremely upset because (redacted) had not wanted to do it in the first place and had been reassured multiple times that Ballard's son would not be coming inside or see them acting out the COUPLES RUSE. (Redacted) was freaking out a bit and came and told me what had happened.

At this point, Ballard 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. Ballard 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 Ballard and (redacted). At this point I think it was coming up on 4:00 am. Ballard 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 29, 2021, and said I was a 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, located at 758 S Automall Dr. Unit 5 American Fork, Utah, and I told him that I would. On November 1, 2021, I went up to the address he sent me. When I arrived, Ballard and Matthew Cooper were both there. Ballard 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 female 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 situations 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 longtime 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. Ballard 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 Ballard then I believe, and Ballard 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 Ballard tried to start things physically again, but I had to leave for an appointment, and I used that as an excuse to leave.

Ballard 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 Ballard 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 (Ballard 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 Ballard. 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 Ballard 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 Ballard a bit. I didn't get into any details because I knew that he was friends with Ballard, 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 Ballard needed some help.

I told him I felt like Ballard had seen a lot of things that were probably messing with his mental state a bit. I told him that I felt like Ballard, 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 Ballard'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 Katherine, 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 Ballard and Coop told him what I had said about him potentially seeing a therapist or seeking mental health. Ballard 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 Ballard, 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 Ballard 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 Ballard and Coop was on November 11, 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 Ballard hurt.

## **EXHIBIT D**

### **STATEMENT OF MK**

I've known Ballard 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 O.U.R.), 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. Ballard 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 he 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. 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. Those scenarios included:

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 girlfriend (GF) the entire trip, including in the airport and back. 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. 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. I met Ballard 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 "Fuck 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 anymore 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, Ballard 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 he 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 Ballard, 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 O.U.R. 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. She said, "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 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. I asked him what he meant. That's when he started telling me about a COUPLES RUSE. Tim said that the way they had been getting intel on ops had worked for a while, 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 COUPLES 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, and 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 telling 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 she was in love with 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 not to sign the contract 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 NDAs. 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 and hanging out so we could get really comfortable with each other, and we could know how each other works. We would even need to get to know our normal personalities, like, if we were sitting down with me putting my leg over his leg, things like, and holding hands. Tim said we really needed to get 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, then if we had to save one another, we could trust that would happen.

He started slowly touching my hand, slowly touching my leg, slowly rubbing my back, and I just kept 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 asked me if I wanted to go to a gala that was coming up for his company. And I said yes. So he got C.L. and me tickets to that. At this point, we had only seen each other those two times, but we had been talking and we were planning to get together with Matt Cooper and C.L. again at my house one night, when I didn't have kids just so we could all kind of hang out and talk and get more comfortable with each other.

We were planning on doing that before that gala, so what happened was, we got together. Me, C.L., Matt, and Tim. We were hanging out—we actually played some games and we were trying to all act like couples. It was very strange, but that's, quote unquote, what you're supposed to be doing. Tim started kissing my neck and my forehead and grabbing my butt. He kept telling me, like this is what we have to do so that we are comfortable with one another. However, Matt Cooper wasn't 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? Tim 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. They also said we 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. We said okay. That's all we really talked 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 asked Matt if he would go hang out in another room so he and I could just get more comfortable, and talk more one-on-one—just talk 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, Tim pulls me in really close,

he starts rubbing my arms, and he puts his face in my neck. He 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?” So I started 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 to more questions. So I started asking him, “Well, what do you have to do with your other partners?” He proceeded 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 were 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 began to tell me the first time I met Tim and Katherine, she later told him that she had a strong feeling I should be his partner. So once again I was feeling very uneasy. But I was 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, Tim and I 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 wanted 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 needed to dress slutty. He said, “We can look up outfits for you,” and he 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.

Tim and Matt came over the night before the “training” 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 to 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. 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 walk out the door and said, “You still need to learn how to smack my ass”, so I patted 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 came around, which was October 28. This is when we were going to the gym to do the "self-defense training" class. Tim of course is texting me in the morning and telling me he's so sorry for staying too late the night before. He was kind of giving me a little rundown about what time where we were going to meet that night. Tim asked me what I was going to wear because we never ended up talking about what we were going to wear 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?" 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. 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 could talk to C.L. about, and he told me nothing. He said, "But we can talk at the gym." So we got to the gym. Nobody was there yet. Everyone was kind of running late. So as soon as C.L. arrived, I jumped in the car with her. We just 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 what we should wear to strip clubs? We don't know what to wear to strip clubs because we are moms. We don't know how to dress slutty. We don't go out, we're boring moms, so we were just having fun, which was nice. I wanted to talk to her so bad, but I just felt a little scared to say anything. At this point Tim was really pushing me to get a passport. He was telling me that in a couple of weeks they have an OP that he really wanted me to go on with him, and because I don't have a passport, we need to get it expedited.

At the gym, he told me that I really needed to talk with Matt Cooper about it. Everyone

finally got there. It was Matt Cooper, C.L., Tim, Blaine (Tim's son), who had just gotten home from a mission a week or two before, and a girl named D.M. We found out that D.M. was going to be on the OPS with us that night that we started doing the training. D.M. told us that she had just barely gotten a divorce, and she told us about her husband (I think), who had previously been in the 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. had just asked him if she could be his 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, aren't you 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 finished the self-defense training. We signed new NDA contracts.

I never got a copy of the NDA—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. 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.

He said that 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 from. Tim 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.”

He said, “We'll just Uber from your house.” When he got to my house, he was with his son and Matt Cooper (the same son who was at the training, Blaine.) 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 that Blaine could be included and that he would not be going into any bars or any strip clubs; rather, Blaine was going to be on the outside. Blaine would just do 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 was 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 returned home from a mission, being in a strip club.

So they get everything ready. All the phones were ready, everything connected. Those phones—OUR phones—can only connect with people who have one of those phones. They gave us a phone and then they left.

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 Tim wanted to go up to my bathroom in my bedroom and put his tattoo on. So we went up and he changed in my bathroom with the door closed. He came out and I put his tattoo

on his arm. I think we also put a headband on him. Then we got ready to leave.

I think our Uber was supposed to be there in five minutes, and he kind of just pushed me back onto my bed. I was like, “What are you doing?” And he said, “I just want to see how far you're willing to go.” 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 started kissing my legs and he lifted up my dress to right underneath where my boobs are. And he kissed 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 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 could do it if we were in a situation, but in my bedroom it 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 tried to talk to him and ask him questions so that he would stop for a minute and answer my questions. Then he would start kissing my stomach again and kissing my neck, and putting his legs in between my legs. Grinding on me. Asking me to kiss his neck. His stomach. Then my phone kept ringing and buzzing, so I pushed him off me so that I could get my phone. It was Matt Cooper. He sounded 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. I said I needed to freshen up.

Tim told 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. Tim 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 into the bathroom to finish freshening up.

When I came back, I noticed my drawer was open. I remembered shutting it. I thought that was strange but didn't think too much about it. Then we got in the Uber and we started 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, and 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. We have to be all over each other, just like groping each other.

So he's just all over me; he even spreads my legs in the car and 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 got to the bar/strip club. We were the first ones there. We went inside and we sat at a table, and Tim told me that I just need to be all over him. He said I need to give him lap dances. He also said that 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 ask 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 went back to this private room.

At this point, Matt Cooper, D.M. and C.L. show up. They needed to pretend that they didn't know us. They just walked by us. They sat down and I could see they were talking to people. I'm not quite sure what else happened. I just remember being back in this room with the stripper's 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 wearing 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 Tim said, "I'm sorry, was that too much?" And I said, "Yes. I just need to breathe." So we walked around 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."

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 telling myself 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 the 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, and they have little to no underwear on. I am feeling sick to my stomach. I wanted to cry, so I excused myself. I went to the bathroom. I was in a stall. It was disgusting. I didn't even dare to pee. I just leaned my head over because I didn't want to mess up my makeup. And I let the tears just fall to the ground because I didn't want to mess up my makeup. I was trying to keep it together. But this was so hard for me. I pulled it together as much as I could. I didn't have my phone. We weren't allowed to have our phones. So I was just really trying hard to be okay. I washed my hands, and I went out and I noticed that Tim had his arm around D.M.

C.L. is sitting in a booth with Matt Cooper. Tim walked over to me and asked me if I was okay. I said, "Yep." He was like okay, come with me, and we start dancing, and then he takes me into this room. He whispered in my ear, "Are you okay?" And I just nodded, and he said, "Okay." We are in this little room by ourselves.

There's a curtain and a woman opened it, and she asked us if we wanted someone to come dance for us. Tim told them that I was going to dance for him, so he told me that I need to give him a lap dance. So I started giving him a lap dance, and the next thing I knew, his son opened the curtain and I'm staring him straight in the face. He is watching me give his dad a lap dance. I lost it. I came unglued. Blaine, Tim's son, turned around, said, "Sorry", and walked 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 that he lied to me when he 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 was 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. Her vagina is completely hanging out, and he's like a deer in the headlights. I grabbed him. I told him he needed to leave. Then I went and grabbed Matt, C.L., and D.M. I said we are done. I was so upset. Blaine should not have been in there.

At this point we were leaving. I had never seen this older gentleman, but he is clearly a

part of O.U.R. and the team. He came up and apologized to me. I just said, "Whatever." We were all leaving. We were 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." I walked right up to Blaine, and I asked him if his mom knew where he was that night. He said, "She knows I'm here with my dad."

And I said, "So what does she think you're doing?" He said, "Well, she thinks that I'm just helping with training." I asked him, "Does she know that you are going to strip clubs?" and he said no. I asked, "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 told me that he has a girlfriend and that she had waited for him while he was on his mission. I said, "How do you think your girlfriend would feel with you being here?" And he said, "Not okay." I said, "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 huddled up. I stood in the corner because I was so pissed off, and everyone was still just kind of apologizing, like we're so sorry. It was really awkward. I don't really remember the rest of the night. I got a message from Tim the next morning at 6:52 a.m. 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 had a brain tumor and was dying. I confided in Tim 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, and that he had not done operations for a while. He said that even now, after that night, how he saw that I protected Blaine and him [Tim], 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 said he wanted me to know that he really does care about me and that 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. 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 [the conversation] around about 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 for 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 kept 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, around the end of October, he came over and 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 wanted to tell me his deepest, darkest secrets. He said that he felt like he could relate to me and rely on me; that I was the only one right now that he could 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. 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. 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 had come over a couple of times. I'm not sure exactly what we had talked about or what the days were. This was all at the end of October. But he had 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.” Tim said that even at the end of the night, he kept telling her, “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. He said 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. Tim said that she had tried kissing him. They still

remained friends. Tim said that it was hard on Katherine, knowing but not knowing. Tim said that 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 told me to read this book, it was called the *Visions of Glory*. Tim said 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, and that he would be the President of the United States. Tim told me that he also had another psychic friend, one here in Utah, and that she would tell him things like who his partners should be. 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. Tim had been going to California, where he was doing shows on PragerU. Tim was telling me that they wanted him to start hosting his own show. Tim said that while he was there, he had met with this lady who had done tantric on him. He said that they got naked together.

Tim said she didn't touch him, but she did sit behind him, and she would do these tantric exercises on him. Tim said that what would happen is, it would get out all of the bad like Juju in him, and 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 said he wasn't attracted to her. He said she was an older woman, not attractive, but that he was getting out all the gross toxins and stuff in his body. But, he said that he could have an orgasm, and he would ask me if I thought he should feel bad about it.

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." I told him I was not interested in that. I 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 did not want to talk about it. He would just say that they couldn't talk about it openly. So at the time, I mean, I'm a hairstylist, and a lot of women talk about these things. 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 he had this therapy session, and that's when he was telling me about this tantric stuff.

Then we had 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 female 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. Matt and Dean split us up. Matt saw C.L. across the table from me, and he sat right next to her, and Dean sat right next to me. We both looked at each other, even texted each other, like what just happened? This was so weird. Dean was very nice. He started talking to me and asked me questions about my life and how I was liking training with Tim, and if I liked being like his partner, and things like that. He 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 [NDA] I signed says I can't tell anybody about being an operator. Not even anyone else in the company, not even other operators. Nobody. So I was feeling super nervous. I was even wondering if it was a test. I was feeling very uneasy. So I was kind of

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. 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.”

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 was sitting next to D.S., who I feel was also asking me lots of questions. 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. 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. Tim 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.”

At some point she said, “You are going to have to be uncomfortable; He would never do anything that he is not supposed to do.” I said okay, and in 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. She said all of these things. It gave me some courage to keep going.

The gala was done, and people were dancing and talking. I decided to go to the bathroom. Because I felt that I was in a very awkward situation, sitting in the middle of Dean and D.S., I made my way to the bathroom.

I ran into Tim's wife, (I had only met her the one time before when I did Tim's hair). I stopped her because Tim said that she felt like I should be his operator, so I wanted to talk to her. I said, “Hi, do you remember me? I met you when I did Tim's hair.” 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. She did not seem to know that I was an operator for Tim. She said, "Oh, are you still doing Tim's hair?" And I said, "Yes." She was like, "That's so great. It's been looking good."

She said she was sorry that she didn't like it blonde and that she might have been weird that day. I said, "Oh please don't be sorry. Please don't apologize. I hope that you ended up liking it." She said she did. I just told her she looked beautiful, and we moved on. I figured she didn't mention me being an operator with Tim 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 started asking us, "What kind of training have we done?"e I just loodk at C.L. I didn't know what to say. I didn't know what to do. She told them that we had done self-defense.

We had gone out with Matt Cooper and done some shooting. They told 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 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 me 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 to get 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 we 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 security 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, and 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. I was going to wait a day or two and kind of process things. C.L. and I were both unsure of where to go or what to do. I decided to wait a couple of days.

Tim ended up texting me. He asked me if I could wax him and give him a haircut. I said sure, but so much happened the other night that I felt blindsided. 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 are that I cannot talk to anybody about anything. I said that those rules don't apply to other people, because not only did D.S. know that I was his operator, but so did Matt and Dean. Obviously, they work there, and I understand that, but we were in public and weren't supposed to talk about it. I told him 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, that they were kind of still building it, that they weren't on the same page, but he is the boss. He is the head of the company, and he will do whatever he wants.

Then things started getting weird. The OPS that we were going to go on kept changing dates. It moved to January, then it was moved to February. Tim 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 told him that I was uncomfortable. That did happen, and it's 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 was just about OPS, 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. Tim 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 over a little before, so we could wax his face really quickly. That way, he couldn't stay after for a long time and use that as an excuse. Of course, he wanted to stay after, but 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, and 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, and that he was going to run projects from home. We spoke 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 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 myself that he was getting off all this medicine, and that 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.

He just kind of kept texting random things. Nothing big... he kind of started getting a little bit deceptive of like, that I tell people things. He would say, these are things that happened, 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 since we weren't doing OPS anymore. I just kept telling him that it was 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. He said 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. Her husband really wanted to work for OUR. He had been talking to B.C. as well. I told my friend's husband that I knew Tim Ballard, that I did his hair, and I would ask him personally.

I 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."

Tim was also talking about how he thought maybe I really should do operations and partner with somebody else. All of these things. This was all through text messages. At this point, I was really sort of thinking that he seems very much like a narcissist. I asked him if he would read a few books if I asked him, and he said yes. I send him books on narcissists. He said he would read them. More than anything, I kept pushing to get together with him for my friend, because he really did want to get a job and meet with him.

Tim was also still 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 it waxed, and his neck and face and stuff, 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 (REDACTED).

Cooper came with him. We just went down there, and he got waxed. 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 about it. He said, we are just friends. "Good. It was just very weird." So at this point, we just texted until about January.

We continued to text about random things, but we didn't really get together. I was still kind of talking to him about helping him and having him help my friend get a job there. Finally, we met together with my friend. We met together with (REDACTED), Matt Cooper, and me at my home. At this point, I had been telling (REDACTED) that I did not think it was a good idea for him to be involved in O.U.R. He really bad because he 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 the confidentiality agreement.

I told (REDACTED) 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. Tim and Matt arrived first. Tim appeared a little bit off when he got here. They were only here for maybe about five minutes before (REDACTED) got here.

(REDACTED) showed up. I don't remember what they talked about, except for when Tim started telling (REDACTED) 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.

Tim was saying horrible, awful things about things he would want to do to kids. Tim's face changed. His demeanor changed. He was showing (REDACTED) that that's what it would be like. But not only that, it was like Tim couldn't get out of the mode. He couldn't change back. He became vulgar, and I didn't recognize him. Right then, (REDACTED) left.

Tim's started freaking out. He was opening my cupboards and slamming them. I looked at Matt Cooper, as if, what is going on?? and he asked me to go upstairs for a minute, so I did. I went upstairs and I could hear Tim yelling. I shut my bedroom door. I was honestly afraid. Tim was yelling, and I could hear doors slamming and my cupboards opening and shutting again. 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, 2022, Tim came over to my home. He came over because he needed me to cut his hair. He was going on 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 said he had just done some intense therapy with the military. 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, so 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 into my neck, and 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 said he believed that he and I had been married in a different life. He said that is why he was so physically attracted to me, and emotionally attached to me. He asked me, “If Katherine ever died or if they were to ever get divorced, did I think 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. He was still kneeling in front of me, and he 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. 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 was 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 was having a hard time standing up. I turned over on my stomach, and finally stood up. As I was standing up, he took his shirt off and he grabbed me and hugged me. He said, “I just need to feel you. I just need to be skin-to-skin.” I was honestly terrified. I was 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 back away as I was saying that. I thought maybe he was going to put his shirt on again. But instead 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 started undoing his pants and he took off his belt. I was backing up against my stairs. Before I could get even a few steps up, he grabbed me and pushed himself on top of me, so that I was lying against the stairs. He pulled down my pants, maybe to my knees or calves.

I squeezed my legs together so he 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 started grinding on me. I just remember squeezing my legs closed tight as I could. He started telling me how beautiful I am. I was starting to feel like I was going to freeze up. I felt 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 and zipped his pants 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 refused to think about it, until I ran into him back in June 2023. It was at the CEO fight nights up in Salt Lake— I remember looking at him and feeling sadness.

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. 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. It wasn't until my friends (REDACTED) and (REDACTED), who are friends with B.C. who worked at O.U.R., asked me if I wanted to talk to B.C. (REDACTED) and (REDACTED) 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. B.C. 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 our mutual friends, the (REDACTED). 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. I talked to B.C. and started telling her what happened. 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 the time of the assault. I was thinking about the way I was now looking back on my life, ever since I met Tim, and seeing what it's done to me. I lost my job at the end of May 2022. I have been really sick on and off. I haven't been able to keep my clients, like I previously had done during the 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 block it out 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.