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

AA and FT,

Plaintiffs,

v.

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

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

Civil No.:

Judge:

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; BEN PACK, an individual; MARK REYNOLDS, an individual; STEPHAN FAIRBANKS, an individual; and DOES 1 through 100.

Defendants.

Plaintiffs AA and FT,¹ by and through their counsel, hereby complain against Defendants and allege as follows:

PARTIES, JURISDICTION, AND VENUE

1. Plaintiff AA is a female adult citizen and resident of the State of Utah.
2. Plaintiff FT is a male adult citizen and resident of the State of Utah, and the spouse of AA.
3. Defendant Timothy Ballard, aka Tim Ballard ("Ballard") is an adult citizen and resident of the State of Utah.
4. Defendant Operation Underground Railroad, Inc. ("OUR") is a Utah non-profit corporation.

¹ 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 and in this case, actually have threatened FT, AA's husband. 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.

5. Defendant The Spear Fund is a Utah corporation.
6. Defendant Rockwell Group, Inc. is a Utah corporation.
7. Defendant Liberty and Light is a Utah corporation.
8. Defendant Slave Stealers, LLC, is a Utah Limited Liability Company.
9. Defendant Children Need Families Foundation is a Utah Limited Liability Company.
10. Defendant Deacon, Inc., is a Nevada corporation.
11. Defendant Ballard is the alter-ego and the face of all of the said corporate and company entities that will be collectively referred to as "OUR" as Ballard wore many hats with said companies and no distinction between the companies was made.
12. Defendant Janet Russon is an adult citizen and resident of the State of Utah.
13. Defendant Craig Anderson is a member of OUR's board and is an adult citizen and resident of the State of Utah.
14. Defendant Julian Ann Blake is a member of OUR's board and is an adult citizen and resident of the State of Utah.
15. Defendant Wes Mortenson is a member of OUR's board and is an adult citizen and resident of the State of Utah,
16. Defendant Ben Pack is a member of OUR's board and is an adult citizen and resident of the State of Utah.
17. Defendant Mark Reynolds is a member of OUR's board and is an adult citizen and resident of the State of Utah.

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

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

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

21. 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

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

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

24. 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."

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

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

27. 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.

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

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

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

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

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

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

34. 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.

35. 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.

36. 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.

37. 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.

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

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

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

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

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

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

44. 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.

45. 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 investigations were pouring into his office regarding the improprieties of OUR and Ballard.

46. 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.

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

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

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

50. 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.

51. 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).

52. 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.

53. 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.

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

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

56. 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.

57. 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.

58. 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.

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

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

61. 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.

62. 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.

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

64. 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.

65. 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.

66. 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.

67. Ballard 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.

68. For example, he missed a \$250,000 speaking engagement a few weeks ago because he was drunk and missed his flight.



69. 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.

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

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

72. 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.

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

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

75. 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.

76. 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.

77. 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.

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

79. 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)².

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

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

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

83. Ballard began to claim that President M. Russell Ballard of The Church of Jesus Christ of Latter-Day Saints 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.

84. 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.

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

85. 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.

86. 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 Prophet of Ballard's Church, to usher in the second coming of Jesus Christ.

He feels:

- He is stepping out side of himself.
- He he is himself 100% while in K state.
- While in K Ultimate truth serum/ can say all -he needs to say.
- God speaks to him.

Asking: God, Nephi, Tom Harrison and angels:

- What do I need to do?
- Help to prepare himself

"Forgive me father and mother"

"With this freedom I bring love and light.
With this freedom he effortless gives love
and light"

"In this freedom. I effortlessly. I see and
give the love and light to gods connection
to the world"

"Why did you send me here?"

"I just want to help people"

"What have I done to these people?"

"Father, mother please protect me"

"Tom Harrison"

"Who are you [redacted] sister?"

"Katherine"

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

88. 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.

89. 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.

90. 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."

91. 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.

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

93. 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.

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

95. In October of 2022, Plaintiff AA was an employee at OUR.

96. Ballard walked into a meeting where Plaintiff AA was engaged and asked her if she was ever interested in doing Operations.

97. Plaintiff AA dismissed the suggestion as she wanted to work in aftercare.

98. Plaintiff AA laughed, saying, "I don't picture myself breaking down doors in combat boots," as that is the impression she always had with OPS.

99. Ballard assured Plaintiff AA that OPS were not all just that, as there were a lot of female operators, and some of the best operators were female operators.

100. Ballard elaborated and said that he was in the middle of an operation and needed help and thought Plaintiff AA could help.

101. This was the first 1x1 conversation Plaintiff had ever had with Ballard.

102. The remainder of Plaintiff AA's history with Ballard and the other Defendants is set forth in her statement, which is attached hereto as Exhibit A and is incorporated herewith.

103. Plaintiff AA eventually began working on OPS with Tim Ballard and followed him to Spear after he was terminated by OUR, contracting with Ballard, who

promised to pay her at a minimum, double her annual salary plus large bonuses (*i.e.*, at a minimum, \$200,000 annually.)

104. Ballard would also claim that “this is all for the New Covenant.”

105. Ballard would also state that “these aren’t our real bodies. Jesus gave us our bodies to use like this.”

106. Ballard was always telling Plaintiff AA that before Plaintiff AA became an operative, he had wanted to “put a bullet in his brain”.

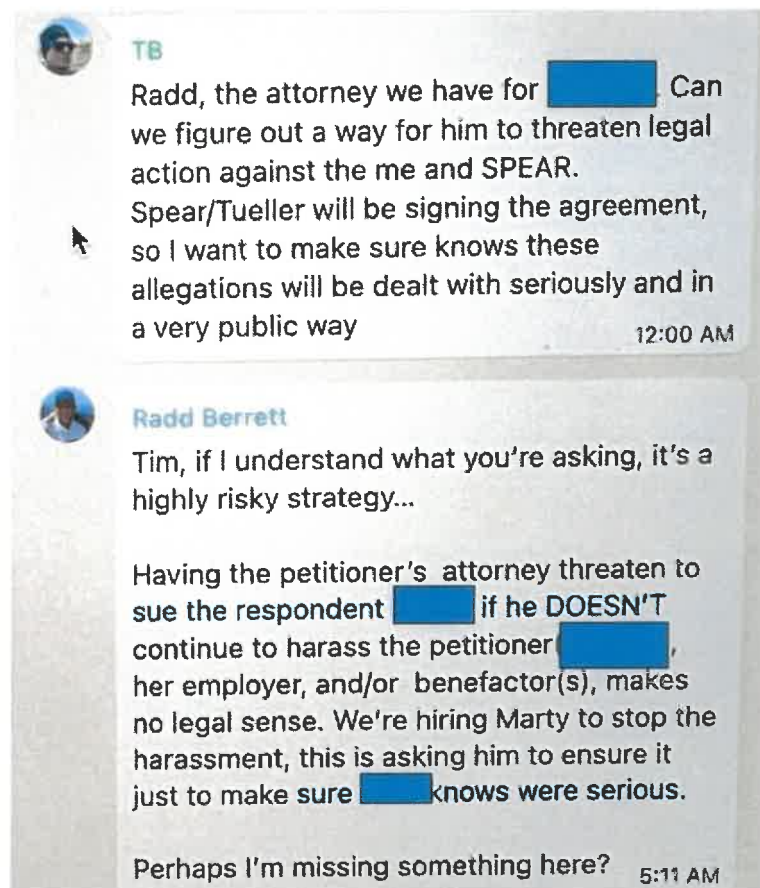
107. He also threatened Plaintiff AA that he would “put a bullet in my brain if you ever leave me.”

108. Eventually, Plaintiff AA’s husband, Plaintiff FT, grew angry that his wife was always gone with Ballard and that Ballard’s texts to her were too familiar and unprofessional.

109. Plaintiffs eventually separated over the wedge that Ballard has put into their marriage.

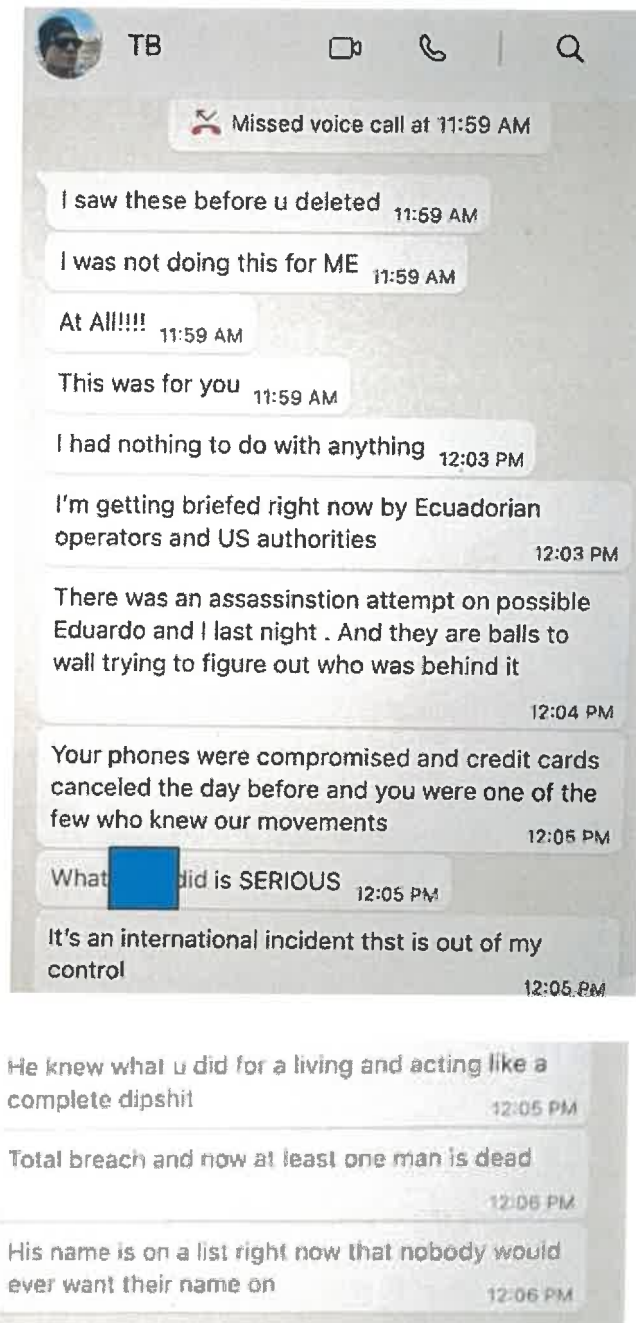
110. Ballard offered to pay for the divorce attorney for AA.

111. Ballard ordered one of his favorite henchmen, Radd Barrett, to call and threaten Plaintiff FT.



112. Radd Barrett agreed to try and intimidate Plaintiff FT.

113. Radd Barrett left a voice message, threatening Plaintiff FT, given that Ballard was in Ecuador for the premier of *Sound of Freedom*, claiming that there was an assassination attempt on Ballard and a successful one on an Ecuadorian presidential candidate, and that the Ecuadorian Secret Service was blaming Plaintiff FT for a security breach that resulted in the murder and attempted murder.



114. This threatening call resulted in FT calling the police and filing a report.

115. 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.

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

117. OUR terminated Tim Ballard.

118. 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.

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

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

121. 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.

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

123. 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.

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

125. The Defendants, including and especially Ballard, engaged in a fraud in order to engage in sexual relations and escapades with Plaintiff AA, the fact of which are specifically set forth in each of the Plaintiff's statement that is attached and incorporated herein.

126. Plaintiff AA has not been paid since joining Ballard at Spear, nor has she been fully reimbursed for the thousands of dollars she has put on her personal credit cards to fund Ballard's travels, leaving her financially devastated along with the trauma of realizing she was groomed and abused by Ballard.

FIRST CAUSE OF ACTION
(SEXUAL ASSAULT AND BATTERY BY PLAINTIFF AA AGAINST
DEFENDANT TIM BALLARD)

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

128. Defendant Ballard, intentionally, knowingly or recklessly, committed battery and sexual assault or had others commit sexual assaults of Plaintiff AA, as all sexual touching was done under the COUPLES RUSE in order to help save trafficked children and women.

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

130. As a direct and proximate result of the wrongful conduct of Ballard,

Plaintiff AA has incurred and will yet incur medical and therapy expenses, and lost wages all to her special damages in a reasonable sum.

WHEREFORE, Plaintiff AA prays for relief as set forth below.

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

131. Plaintiff AA incorporates the preceding allegations and the attachments to this complaint, as if fully set forth herein.

132. 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.

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

134. The Defendants conspired and combined together for the purpose of Ballard and/or others being allowed to have sexual relations with the Plaintiff AA.

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

136. There was a meeting of the minds among the defendants with regard to the COUPLES RUSE and how to allow Ballard and others to sexually abuse the Plaintiff AA.

137. As a direct and proximate result of the wrongful conduct of Defendants, Plaintiff AA has suffered severe emotional distress, permanent injury, loss of self-esteem and other injuries, all to her general damages in reasonable sums.

138. As a direct and proximate result of the wrongful conduct of Defendants, Plaintiff AA has incurred and will yet incur medical and therapy expenses, and lost wages all to her special damages in a reasonable sum.

WHEREFORE, Plaintiff prays for relief as set forth below.

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

139. 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.

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

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

142. Defendant Ballard made representation(s) about the COUPLES RUSE, who approved it and how it helps in fighting human trafficking, which were false and the Defendant Ballard knew to be false, for the purposes of inducing the Plaintiff AA into participating or attempting to have her participate, in the COUPLES RUSE, and so that Plaintiff AA would not object to the COUPLES RUSE so that Ballard could act out his sexual proclivities.

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

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

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

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

WHEREFORE, Plaintiffs pray for relief as set forth below.

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

146. 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.

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

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

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

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

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

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

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

WHEREFORE, Plaintiffs pray for relief as set forth below.

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

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

154. 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.

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

156. 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.

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

WHEREFORE, Plaintiffs pray for relief as set forth below.

SIXTH CAUSE OF ACTION
(OUTRAGE AGAINST ALL DEFENDANTS)

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

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

160. 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.

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

WHEREFORE, Plaintiffs pray for relief as set forth below.

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

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

163. 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.

164. The conduct of the Defendants, as set forth herein, was negligent and

violated the standards of care required to protect the plaintiffs.

165. 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.

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

WHEREFORE, Plaintiffs pray for relief as set forth below.

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

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

168. 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.

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

170. 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.

171. 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.

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

WHEREFORE, Plaintiffs pray for relief as set forth below.

NINTH CAUSE OF ACTION
(NEGLIGENCE BY ALL PLAINTIFFS AGAINST ALL DEFENDANTS)

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

174. 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.

175. 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.

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

WHEREFORE, Plaintiffs pray for relief as set forth below.

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

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

complaint, as if fully set forth herein.

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

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

180. 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.

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

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

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

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

184. 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.

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

186. 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.

187. 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.

TWELFTH CAUSE OF ACTION
(ALIENATION OF AFFECTION BY PLAINTIFF FT v. TIM BALLARD)

188. Plaintiff FT incorporates the preceding allegations and the attachments to this complaint, as if fully set forth herein.

189. Defendant Ballard purposely alienated FT's spouse's (AA) affections from FT and is subject to liability for the harm he caused to Plaintiff FT's legally protected marital interests.

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

191. As a direct and proximate result of the wrongful conduct of Ballard, Plaintiff FT has incurred and will yet incur medical and therapy expenses, and lost wages all to her special damages in a reasonable sum.

WHEREFORE, Plaintiff FT prays for relief as set forth below.

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

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

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

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

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

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

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs pray for judgment against Defendants as follows:

1. For general damages in an amount to be proved at trial;
2. For special damages in an amount to be proved at trial, including Plaintiff AA's lost wages trebled (at a minimum \$600,000).

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 10th day of October, 2023.

ALL UTAH LAW PLLC

/s/Suzette Rasmussen
Suzette Rasmussen

GREEN LAW PLLC

/s/Michael K. Green
Michael K. Green

MORTENSEN MILNE

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

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

STATEMENT OF AA

Beginning:

Tim first approached me when I was working late at the office in October 2022. I was getting ready to leave the office at 7 p.m. He was there. He told me he was there to film. Later, I found out he was meeting a lady named Lori, who also does "readings." Tim often calls Lori (the psychic) for advice on many things, i.e., operations, lawsuits, and daily Tim crises.

Tim walked into the office of my boss at the time, (redacted) office, and shut the door. It was just me and him. He asked me if I was ever interested in doing Operations. I said No way! I was working towards being in Aftercare. At this time, I was an employee of OUR. I laughed, saying, "I don't picture myself breaking down doors in combat boots," as that's the impression I always had with operations.

He told me that operations were not all just that, that there were a lot of female operators, and some of the best operators were female operators. He elaborated and said he was in the middle of an operation and needed help and thought I could help. I didn't talk much, as this was the first 1x1 conversation I had ever had with Tim, and I thought it came out of nowhere, so I was trying to wrap my head around what he was asking and make sense of it.

He said there is a case he hopes I could help with in London. When the operation started, the female operator he used couldn't take any more time off work, and he needed a female partner. He explained that the female partner is there to pose as a girlfriend when they are having conversations at a party.

He explained that this operation involved his team encountering a trafficked female and he needed more information from her. To do that, his Ops team was required to fly to London. Tim needed a girlfriend present. This new role would be there to befriend the trafficked girl during the party while they tried to get the information they needed from her.

He said every detail counts, even as small as him returning with a girlfriend. He told me he kept asking God, "Who should I bring? I need someone who can pull this off." He said he was driving down the road and saw my face, which was crazy

because he doesn't even know my name. Then, he apologized for not knowing my name. Dmitri, his bodyguard, opened the door, cluing Tim in to get on with it so that he could move along. Tim asked for my number, and then I went home.

The following day, Tim called me and asked if I could fly to San Clemente, California, for an Ops training. It was the same time that the board meeting was happening. I told him yes. He told me repeatedly that all this needed to be a secret and it was essential that Ops was on the "down low." I didn't find that weird, as no one at OUR talked about operations. It was all very secretive.

When I got to California, Dmitri picked me up. Dmitri and I got some lunch, and he checked me into the hotel I was staying in. I remember Dmitri asked, "So why did Tim fly you out here?" I told him, honestly, I didn't know how to answer that. Tim told me not to tell anyone or anything, so a few things were going through my mind already.

- 1- Is this a test?
- 2- Am I in trouble for flying to CA since I am still so confused about what Tim was asking me to do?
- 3- Why is Dmitri asking me, shouldn't he know?

Looking back, I can tell now that Dmitri's response was clear that he was annoyed that I was there; he was annoyed that Tim was up to something. Tim called me when Dmitri and I were getting lunch. There was music in the background, and Tim got mad. "Where are you? Why are you not at your hotel?" I told him we were finishing lunch, and then checked into my hotel. At this time, it was about 2 p.m. Tim told me he would come by my hotel soon. I still didn't ask questions and just said ok.

It was approximately 6 p.m. when Tim got to my hotel room. I remember feeling very uncomfortable in the hotel room alone with another man and afraid and shy to say anything. I also thought: this is Tim Ballard; I should feel differently.

He was explaining roles in Operations. "I go by Brian Black; when I am in the role, I will be Brian Black." He started to explain what "Couples Ruse" is. Two operators can block each other in strip clubs or massage parlors. It will cover any suspicion of the operators being the good guys. He gave an example where, if in a strip club,

the stripper wants to sit on his lap, his girlfriend can block that from happening by sitting on his lap.

Another example was, while getting information in massage spas, while getting couples massages, trying to get information, if the traffickers try doing anything to either one of the operators, the safe word is "Fuck me," and that is the clue to get your partner help in being sexually harassed by saying, "Get out. We want to be alone now."

"Traffickers can smell pheromones, so we must have real chemistry during the couple's ruse, or the traffickers will call us out."

Tim said he had rules that there is no kissing or touching private parts if he ever does a couple ruse with anyone. I remember saying, "Is HR going to pop out of the closet?" during this whole conversation because he didn't say any of this to me before I got to California, and I couldn't believe I was hearing what I was hearing.

The role he asked me to play still needed to be clarified. I was led to believe I was helping with a case in London, but not in the context of a couple's ruse in that way. That differs from how it was explained to me in UT at the office. Essentially, Tim wanted me to befriend a girl they were trying to save in London that they had already found and believed she was trafficked out of North Korea.

Tim continued to talk about chakras and tantric massages; it was all very confusing, but I just wanted to help however I could.

When he left, he hugged me and lifted my shirt to look at my stomach. He said he had no idea I had such a hot body because I was always so covered at the office. My back was facing the bed, and it was easy to fall back on it. He pulled me in tighter and kissed my neck; he said that kissing my neck up and down would avoid kissing lips. He had me lay on my back on the bed to show me how to "fake fuck" while both our clothes were on.

One of the positions he showed me was he wrapped one of my legs over his neck and began to thrust, explaining it would show as if his dick was sliding in me, but going under me without actually going in. He told me another female partner came up with this technique, and it works all the time. They were able to save

hundreds of kids this way. It was so uncomfortable, but I dismissed it because it was Tim Ballard, and what did I know after all? He was the operator; I was someone he was told could help break this “huge trafficking ring coming out of North Korea.”

Tim then left and said he and an operator would return later. He came back a few hours later but was alone. He told me an operator would follow us in a different car, and I wouldn't see him. It was all part of the training. He said they would text him throughout the night and give us tasks; we would need to do them. This shows if I can pass the tasks assigned.

We first went to dinner, and he said he got a text that said we needed to get in the hot tub. I told him that was dumb; we were at the Four Seasons in California, and people may recognize him. I did not want to do it, but I did it anyway. When I was in the hot tub, he took his shirt and garment shirt off and mentioned he sees angels all around, and that this isn't wrong. Afterward, he took me back to the hotel, and I went to bed; he returned to his uncle's house, where he was staying.

Tim instructed me to keep this information, tactics, or events private from anyone else.

The next day, he was in board meetings most of the day. I was doing “strength training” with Matt Cooper—which consisted of nothing unusual, just workouts on the beach. We ate dinner at Tim's uncle's house that night; I went back to my hotel room alone, then flew home the following day.

I'm not aware if anyone else at O.U.R knew that I was there that weekend or ever knew I was an operator except for (redacted), the CEO at the time. Brad was fired only a short time after I started doing operations. (redacted) texted me one afternoon to check up on me. Tim always wanted me to tell him whoever was talking to me about operations, so I let him know Brad checked in on me. Tim later told me he called Brad and yelled at him for going around Tim's back. Brad is the CEO, and it can be intimidating for me to get a call from him. That was weird, but again, I ignored it, but ultimately, I was embarrassed.

My operations were and always have been a “secret”. I was led to believe this because Operations is “confidential”. I don't think my boss, (redacted), CFO / COO,

knew I was going on Operations. I was not allowed to discuss it with him or tell him. This made my job very difficult. I was in all day-to-day business operations and projects, then at night and weekends, Tim had me doing the Tim Ballard brand and traveling abroad for Operations. I didn't get any additional pay. I did not expect or ask, as that was not where my heart was, but I felt Tim was putting me in unfair situations, and I couldn't voice it because he was the Founder of OUR and must have had good intentions. "One day, you will make lots of money," he would always say if I would start to bring up any compensation relief, which was never my goal to do.

It was making things difficult for me at home. I was away from home more and more, with no extra pay or real reasons to explain to my husband FT that no position title change made sense on why I was doing what I was doing or salary change, which logically makes sense elsewhere. Simple questions couldn't be answered, like, "Am I covered insurance-wise if I am on an OP?"

Tim had me spying on everything in the office for him, which made it weird for me relationally as I was close to everyone; as I said, I was in everyday business operations for six months before Tim. There was always something or someone doing wrong to Tim in Tim's eyes, so he wanted to keep me in everything and report back to him, and it burnt me out.

First "practice op" in Guayaquil

This took place in Guayaquil. Tim was accepting an award, so he thought we could do a practice operation there to make sure I was prepared to go to London and not screw it up.

We got checked into the hotel, and he said they ordered a massage to come to the room for a couples massage. I kept telling him I was so nervous; how does this go? What should I do? What should I say? Who is it? His response was to go with it. There was a knock at the door. Tim opened the door, and two girls were there to give us a couples massage. I looked at Tim; he got completely naked and lay on the bed, stomach down. I was wearing black shorts and a blue top. I lay on the bed, belly down, with my clothes on. My face was towards his, and he said, "Why didn't you take your clothes off?" I said I didn't know I was supposed to, so I sat up and took my shirt off. I laid back down, and the girls gave us a massage.

I don't speak Spanish, but Tim does; they all were giggling. I asked Tim what they were saying, so it looked like I wanted to be there. Tim turned me on my side and said he was complimenting me on "how hot my girlfriend's body is." He would translate what they said to me. He told me he was asking them how much they masturbate, and asked how they masturbate. One of the girls wanted to show him how they masturbate on me. I remember giggling to play the part, and Tim rolled me on my back. I remember closing my eyes, wanting it to be over. I didn't remember the "safe" word then. I was only remembering that I wanted it to be over.

I heard Tim say he had never seen this done so close and he was getting a lesson. I felt fingers inside me. When I comprehended that, I stood up and went to the bathroom. I heard the girls leaving. I got in the shower and cried. Tim came into the bathroom. It was a glass door, and I turned around because I didn't want him to see me or see me cry, but he said, "You did so good; you are such a badass. No female operator did as good as that." "We are going to save so many kids," he said.

He said he got a name from them that will provide kids, and I should not be sad or feel guilty about anything because we would not have gotten that trafficker's name if I didn't do any of that.

None of it made sense. I remember feeling so disgusted with myself and shoving all of it away because I just wanted to help, and I thought this is how operations work. I told him I would be out soon, so he left. I got out of the shower, dressed, cut his hair, and got ready for the night. We all went to the award ceremony, got on a plane, and flew home. Nothing came of that practice operation. I never heard of checking back in with the trafficker's name that they said they got that night.

Practice OP in Mexico:

Tim had CPAC in Mexico. I went with Tim, Dmitri, and Matt Cooper (Coop) to have another practice leading up to London; mind you, in between these practice operations, the text messages and constant reminders of how important it is to keep everything a secret were a continual reminder, everything was for the greater good, "the new covenant."

We got to Mexico City, and we had a 3-bedroom Airbnb. Me, Coop, and Tim stayed there. They ordered two escorts. They told me they heard that one of them knew traffickers.

I wasn't sure how the night would go; there was never a real plan. I always asked, and he said it was impossible with operations. We had a goal, but besides that, we just got to improvise. I found comfort in not speaking Spanish; it took the pressure off slightly.

The two escorts came over. I stayed in my room for a few minutes; Tim showed me off as his girlfriend when I walked into the living room. The party continued. There was alcohol, and just conversation going. I was asking Tim to ask them questions for me: What do they do for work? What is it like being an escort? How much money do they get paid? Tim told them I was interested in being an escort, but I elaborated in letting them know that I didn't know how to do that sort of thing. I was using that as a defense in getting out of what I felt was coming, which was Tim wanting to be alone with Juli in the back bedroom.

My saying I didn't know how to do that work got me in a worse position; Tim said, "Let's have (redacted) teach you." I didn't have a choice. We all walked to the back bedroom. Tim lay on the bed, and Juli got completely naked and crawled on Tim. She was talking to Tim, telling him to tell me guys like this, guys like that. I kept my clothes on and sat on the bed. She asked Tim why I was shy and still had all my clothes on. Tim asked, and I said to tell her, "Because I don't know how to do any of this, remember?"

The other escort that came in the bedroom and allowed us to break up the "Sex escort training session."

When (redacted) left, Tim asked her about the kids and traffickers they knew. (redacted) elaborated and said she could help get us information; she wanted to return the following night but hang out with me.

2nd night with Juli in Mexico

That night, it was just me and (redacted); I elaborated on the character as the girlfriend wanting to become an escort. Just asking her questions, becoming

friends, but ultimately seeing if I could get any information about the traffickers she allegedly knew.

As I talked to her, I told her I owed Brian (Tim) a lot of money, so I needed to become an escort like her. How do I do it? She told me I needed to get in these groups and to do that, I needed to provide boudoir photos. She also said she could provide kids sold in these groups on WhatsApp. I could get in these groups and meet the traffickers if I provided boudoir pictures of myself. Tim was all for the pictures being done; I got the pictures of myself and sent them to Juli. Juli sent them to her WhatsApp groups.

London Op:

By the time London was here, Tim had me looking online at escorts anywhere we went, wanting me to order them for the night in hopes we could get any information on trafficked kids. He was convinced the new way to find trafficked kids was through escorts. Tim had me make my profile pages with escort agency ads with my boudoir photos.

He had me book escorts for every night we were in London. Two escorts came one night, and he told me to wait down at the bar for 20 minutes.

When I got upstairs, they had just gotten out of the shower. The girls were surprised that I came, so they left. I was relieved. The next night, another escort came. He told me to wait downstairs at the bar for 20 min. I was downstairs with Coop and told him I didn't feel this was right. I don't know much about operations, but why must he be alone with escorts? I walked upstairs; Tim was in a robe on the bed with the escort. I walked over to the escort and started talking to her like she was a friend, which ultimately killed the mood. "I befriended her," as that was my role for the London Op anyway, so I felt good enough to do that instead of engaging in anything sexually, and I did not have anything in me.

The real Op in London-

We had one big suite and hotel rooms. The big suite is where the party is going to take place. The objective of this operation was to get additional information from this girl to confirm she is currently getting trafficked. To do that, we also needed to order her through her agency. So, we did that, and she then met Coop at his hotel room; Tim and I came in. I was introduced as his girlfriend; he talked about

chakras and tantric massages. He was explaining where the chakras were. He had me straddle his lap, and he was demonstrating where each chakra was on me. Then, he said we were going to take a shower. It was almost a production. We walked into the bathroom. He turned the shower on and made "sex" noises. To make the individual think we were having sex in the shower. We got out and walked upstairs to the party to get the needed information.

Once the night was over, we were happy she provided the information, but there has always been one major factor that never made sense to me. Why did I need all these "practice" Ops, including things that didn't come close to what he had me do before London, for London to be a success?

Mexico City / Juli OP-

After London, (redacted) wants to meet up with us because she has information. The operation started terribly from the beginning. We missed our flights, and our luggage was rerouted to another state. We arrived in Mexico City late at night but still met Juli and two of her Ukrainian escort friends. (redacted) was the case we had been working on for a few months. The point of this meeting was to get more info from (redacted) because she kept saying she had "friends" who were selling kids in escort group chats on WhatsApp.

Tim wanted (redacted) to bring Ukraine escorts because he was working on a case from Ukraine. Before they left, Tim told them to come back the following night, which led to having to get more money for their time.

The following morning, we met with a public official; I left the meeting early to see if our bags were back at the hotel and to withdraw more Pesos to pay for (redacted) and the two Russian girls while Tim and Matt Osborne stayed at the meeting.

When Tim and Matt were on their way to the Hotel we were staying at, I told them I would be late due to traffic. I was already texting (redacted), letting her know to go to the bar to buy time so Tim and Matt didn't need to be alone with them in the room. I was under the impression that any OP would start once all the pieces were in place. When I got to the hotel, the girls, Tim, and Matt Osborne, had already been in the hotel room. Tim and (redacted) were on their way down

alone to the hot tub. The three of us crossed paths as I was getting off the elevator. They were getting on the elevator to go down to the hot tub.

I was taken aback by the situation they created for the whole day and I was disgusted; I remember testing Tim with the statement, "I will come," and he said it was just them two going. I share this because it debunks the "couples ruse." Tim and (redacted) would be in the hot tub alone; Matt Osborne was alone in a hotel room with two other girls when I was supposed to be their "blocker." This was more of a "get together" as me and Juli had essentially already developed a "friendship" over the past months. Still, I thought I shouldn't voice this with the bit of experience I have in operations.

We had two rooms and one suite where we all were meeting. One regular room right next door. Matt Osborne was in the suite with the other two girls, and I was too upset to go in there for various reasons.

- I had been alone in Mexico City trying to get pesos out for Tim. We met with a potential "trafficker" the night before in the hotel we were staying at.
- The OP started without all things in place, as discussed.
- All my personal information was being exposed via the front desk; therefore, the TV was on when I entered the room because they were ordering room service and playing music. My actual name was on the TV, not my undercover name.
- These women came over with the impression that they were being paid for sex, but I believed we were paying them for information. I believed we had a plan in place, so sex wouldn't be involved. Tim going off alone with one escort was so unnecessary. That debunked the "couples ruse."

After seeing Tim go to the hot tub with the escort alone, I walked into the regular hotel room to regroup. I texted Matt Osborne to let him know I was back, and he asked me to give him five more min. I thought that was strange. I chose to dismiss, thinking he was just in conversation getting information. When five min was up. I knocked on the door; Matt had makeup on his face, leading me to believe he was kissing one of the girls.

Shortly after I arrived in the room, Matt got a text from Tim. Tim asked if we could all leave the room because he and (redacted) were on their way up from the hot tub, and he needed a little longer with her, so Matt, the two girls, and I went to the restaurant downstairs. It was approximately 30 min, and then Tim texted Matt and said they were done and we could come up.

We all got upstairs. Tim had a robe on, the shower glass doors had water on them, and her bathing suit was on the floor by the window. Matt Osborne left almost right away. I talked with the girls for about 10 minutes, and they all left.

Tim told me immediately that he found himself in a tricky spot. I remember listening with disgust; he then said she wanted to have sex with him so bad, and when she went to get the condom, he “hurried and masturbated,” so by the time she either turned around or walked back, he was able to tell her he couldn’t have sex anymore. He told me he told her, “You’re just so hot I just had to do this instead; I am sorry,” he said.

In doing all that, he said he got information that she wanted to meet up in Playa del Carmen, where her friend was selling kids. I didn’t respond to him on any of this; I remember being unable to say anything. After a couple of awkward seconds of silence, he got an ignorant and rude attitude; I remember he said to the effect that I should be grateful because he just had to sacrifice needing to do something like that to get that information from Juli. I also remember feeling bad because we were there, and the plan was to try and get information from her differently; I didn’t deliver, though, so I was grateful he got the news, so hopefully, we can save kids now.

He then elaborated on how much he has lost and sacrificed, and I now remember feeling bad for accusing him of doing something wrong or judging him, leading me to ignore and forget this happened until now.

January-

I told Tim he needed a team of people to rally around him to help with how busy his life is. He needs more employees. I suggested two individuals that I already knew from the office. These individuals had been with O.U.R. since the beginning, and I thought he could trust them no matter what. He created a department called “Founders Group.” They had kick-off meetings at our Miami office over a

weekend in January. When he returned, he told me he would take one of the individuals on the upcoming operation. I told him I did not think it was a good idea, but Tim knows best. He works off of instinct, and that was that.

The operation he was taking her on was the takedown of a three-year process finally ending. It was also strange, taking someone on there at such high risk with the potential of compromising and losing any of it.

I was going to Mexico 2 days earlier to finish the (redacted) operation with two other operators. I was going to see Tim and this other individual for just one day before I went home, and they went on to start their operation.

Tim and this individual arrived at the safe house alone, which implied they traveled alone to Playa Del Carmen, where we were all staying. I was checking in with Tim's new female partner, and she seemed good. Tim did the final meeting with Juli and me, and nothing came of this.

Fast forward to mid-March. Tim, myself, and the O.U.R. development team were in Miami for a speaking/fundraising event and Gala. Tim always liked filling the time when we were traveling, so we pulled a list of escorts near the area, and he wanted to do some Op Bodyguard tactics. There were two other operators as well to help with this operation and accompanied Tim's security. We rented a three-bedroom condo and one other condo in the same building.

Right before the speaking event, Tim got a call informing him that his lawyer, Brent Andrewson, was flying into Miami to inform him that the individual he brought to Mexico in February had filed a complaint. He wanted to be with him personally to tell him the news.

Tim was so upset, dry-heaving, and throwing up. He gathered himself up enough to speak at the event and returned to the condo. By that time, Brent was there. The three of us talked briefly; Tim was very detailed about what had happened that whole week with him and that other individual. He claimed his innocence, and that nothing had happened. Then Tim brought (redacted) an operator, and Tim's security for the weekend, to speak on how operations work. Tim told me not to have (redacted) come to the condo until he told me to. He was always

particular with details. I never knew why (redacted) was not able to be there when Brent arrived.

Brent put Tim's mind at ease, letting him know that they would do an investigation so that they were covered if anything came back in the future, they could say they performed an investigation, and Tim was innocent, which makes sense.

Once we got back to UT, all my updates on the investigation came from Tim.

I was working from the Lindon office and traveling a lot. I never saw anyone from the main office.

Tim kept asking me to write a complaint letter to O.U.R. regarding sexual harassment and harassment against O.U.R. because the individual lied about me when this happened. Earlier, she had told me that people in the office were uncomfortable with me being an employee, but later recanted and told the investigators that was untrue. This allowed Tim to tell me that this individual is jealous of me as a fellow employee, leaving it accessible for him to cause tension and mistrust between me and this individual.

I never wrote a complaint to O.U.R. or told Tim I didn't.

I talked to H.R. one time. The conversation consisted of me expressing confusion with the whole situation, and I couldn't wait for it all to be over, but that was it.

Again, these people were my friends.

Tim told me he repeatedly would ask Katherine to write a complaint to O.U.R. He told me she didn't want to. He called me one day from his car. He was reading "her complaint" to me out loud, but I could tell he was erasing and editing sentences as he was reading it out loud. I told him he should not turn it in, and then I got off the phone. That was none of my business.

Tim had me out of the main office when the investigation started, and I was not talking to anyone except him. Tim painted the narrative for me and even resigned for me. He isolated ME, making sure I had no access to any information. He told

me what to say. I remember answering questions but still leaving out things I remember now.

He coached me on all the things he wanted me to say. He convinced me that the individual was lying. He went as far as saying this individual was obsessed with him; she wanted to marry him, be his wife when he was the president of the United States, and physically hurt Katherine. He told me she was trying to put cookies on his doorstep to poison Katherine. He painted her out to be this crazy person who became obsessed with him during an operation, and he couldn't escape her. He said all they did was hold hands.

I knew if I elaborated on anything in my interview, it could ruin O.U.R. All operations would stop, and no kids would be saved.

It came time for my interview with the investigator in charge of the case. That day, Tim called me all day. He wanted to meet before to ensure I was prepped. I never did. He was constantly repeating, no drinking on Ops, no kissing or touching private parts over and over and over. I remember telling him I didn't need coaching, as I would say. I stuck to the narrative that Tim painted for me.

February 2023:

By this time, I am an "undercover operator" and employee. I understood that my boss, (redacted), and HR finally knew I was doing Ops. O.U.R. and Tim thought it made sense to move me to be only with Tim since I do operations and have been doing tasks already for Tim. I was hesitant but hopeful for a simpler schedule—and better work-life balance, which had greatly affected my marriage and home life.

Between travel and being at Tim's Lindon office, I was not at the main office that much. Tim was sorting out issues between himself and O.U.R. I was getting all my updates through Tim and no one else. I slowly lost all contact with everyone at O.U.R. as I was just busy with everything Tim.

Korea Town (California): Dec – July 2023

Tim said he was getting intel from spas coming out of Korea Town. So we made a couple of trips there and visited some spas to see if there was anything we would come across. We walked into this spa and asked for a couples massage; they didn't

do them, so he ordered one for me. Tim said he would wait for me in the waiting area. The spa was tiny. Three rooms and the waiting room. It was all close enough to where I could hear everything happening.

I went into the room, undressed, got under the covers, and lay on my stomach. The girl came in to massage me. I could hear Tim talking to the other girls at the front desk, which kept me at ease. I asked the girl a couple of questions, but ½ through the message, Tim was gone. Another worker came in and told the current girl to leave. She told me to turn over so she could massage my feet. A few minutes into the foot massage, I glanced down because I saw the light; I caught the girl recording pictures or video right up the sheet as she gave me a “foot massage.” I noticed the door was opened 3 inches, so when I went to move and ask what was happening, the manager walked in and started cleaning up to distract everything.

I didn’t dare stick up for myself when I caught the girl recording or taking pictures of me because I was left alone in the spa with 3 of the potential traffickers, and I was supposed to act like I would like that, but I didn’t have a way out of it since I didn’t have my “blocker.”

I got dressed and sat in the waiting area for another 10 minutes until Tim returned to pick me up. I asked him where he went. I was upset because he was never supposed to leave me alone, and he told me he went to find more spas.

February 2023- June 2023:

I moved over to being all things Tim Ballard, employee and Operator. He would constantly tell me I was the best operator, no one had done Ops like me before, we were going to save so many kids, he had never trusted anyone as much as he trusted me, and everyone had betrayed him.

He said he would put a bullet in his brain if I ever brought up the need to move positions. I handled all personal Tim Ballard brand and operations. I was prepping for the *Sound of Freedom* tour, and speaking gigs.

Tim was also trying to implement “Operation Bodyguard,” which consisted of couples or two operators going undercover anywhere. Spas, clubs, ordering escorts to rooms, and trying to get intel from them. He was convinced that escorts were the way to get all

information on human trafficking and that the couple's ruse would thrive through "Operation BodyGuard." He was planning the initial training in the Dominican Republic and had me reaching out to couples of his choice to coordinate a time to get there. This never happened.

June 2023 – September 2023

Tim was telling people he resigned from O.U.R. because there would be a conflict with *Sound of Freedom*, and he wanted to start The SPEAR Fund. I always felt weird about that because I was with him on June 9th when he got his termination letter from O.U.R.'s Board members and O.U.R. He never gave me clear information.

He kept me so busy with tasks and me just consoling him daily that I didn't even have the mental capacity to think about getting logical answers to anything I asked. Suppose I did ask a question that deserved a logical explanation. Tim always responded with a crisis he was dealing with, so the subject would be different, and we would then be talking about him again and fixing anything he needed, or complimenting him, telling him it's all going to be okay. I would then feel bad for whatever he was going through and for asking such questions.

I personally never had a conversation with OUR about resigning myself. Tim did it all for me. I was under the impression that I was only leaving to work for Tim. I was told O.U.R. was giving Tim/SPEAR Fund a year's grant to cover my salary. Tim or SPEAR Fund has not paid me. I have not received any salary while working with Tim or The SPEAR Fund—only partial reimbursements.

When I got a separation and release agreement, the wording needed to be more apparent because nothing was adding up. After all, I thought I was only resigning and not being terminated. My husband was the one who brought this to my attention when he read the fine print. There were things in there mentioning I was not re-hireable. Why is that? I asked Tim and didn't get clear answers.

I don't believe I was given a fair chance of leaving OUR in a friendly manner. I never knew Tim's narrative, as I could not be involved in any conversations.

I have been violated and taken advantage of while working in day-to-day business operation tasks at O.U.R., Ops, and an employee, all while being asked to keep it a

secret from everyone I know. "Never mention it to anyone; no one understands. This is for the greater good and the new covenant. We had to be married in past lives," he would say.

I resigned from O.U.R. under a narrative that I had no control over. Tim kept me so busy and isolated from other operators that I never had the chance to understand true operations and all right protocols. I was never able to have any communication with them once I left The SPEAR Fund to understand the full scope of what was going on.

O.U.R. knew the total capacity of what I was being exposed to and did not care to reach out to me in any way this whole time. Instead, they did the opposite: keeping me in operations and putting me in the role of being more available to Tim Ballard.

I believe Tim had me join The SPEAR Fund as a cover to protect himself from these other women he knows he violated for his gain. Tim had a habit of asking me to cover for him on many things, one in particular was asking me to take blame for dirty text messages he said was a tactic that we used in operations on our burner phones. He was always so worried that they would leak out.

Over the past year, I have distanced myself from all my friends and family, thinking it was because I was so busy with work. Still, it was because I couldn't relate to anyone in normal conversation with the things Tim was having me do; that this was in the name of God through revelation and saving children.

This happened through Tim's mind games and manipulation, guilt trips, and last-minute crises, especially when I would speak my mind. I felt I needed to clean up all of Tim's crises that he would throw at me, even when it would supersede my family and personal life.

Working for Tim has cost me relationships, my marriage relationship, and time away from my family for one year. I have burned bridges for this man without knowing it. I have gone into debt for him, and when I would bring it up, it always would come back to a personal crisis Tim was going through. I would feel guilty for

asking for a paycheck I never received since June, or for covering his expenses this year. Since I resigned, I have been able to breathe and realize this was all mind games and manipulation for his personal gain that I will never understand.

Tim's recurring comments to me:

Traffickers can smell pheromones

We are doing this for the greater good

This is all for the new Covenant

I see angels all around

Katherine chose you

These aren't our real bodies. Jesus gave us our bodies to use like this, referring to the couple's ruse. Our bodies are a tool.

I would do anything to save a child. How far would you go?

Janet and Lori said you would never turn on me

You are the only one who could ruin me

I wanted to put a bullet in my brain before you

I will put a bullet in my brain if you ever leave me (constantly said this)

STATEMENT OF FT

Surviving Tim Ballard

I have been dreading the thought of writing this down and having to relive what has been the absolute worst year or so of my life. The last few months in particular have been an absolute nightmare as things started spiraling and I felt helpless and desperate to save my wife and my family from the grasp of Tim Ballard.

Tim Ballard

Tim has taken everything from me. He has purposefully destroyed my marriage, manipulated my wife, ruined the relationship with my kids and with my wife's family. He has gone as far as harassing me at my place of employment, thus affecting my ability to do my job and earn a living. His narcissism, ego, sexual deviancy, and actions have caused irreparable damage in my life. He has taken my dignity, my home, my self-esteem, and pride. He has used the most noble of causes to manipulate vulnerable and well-meaning women, including my wife, to do unspeakable things, and brainwashed them into submission. I think he is a truly evil and dangerous man, with a messiah complex, who used the name of God and the guise of saving children to fulfill his own narcissistic desires, deceiving many people along the way, stealing the valor of actual victims, and exploiting their pain for personal gain. I believe all his actions are very deliberate, calculated, and cunning.

Context

I feel in order to tell this story I need to provide some context on AA, our marriage, as well as myself. Prior to our introduction to Operation Underground Railroad, AA and I had a very good marriage. We have been married for 10 years and together for 12. Like any marriage, it was not perfect, but it was filled with love, affection, care, trust, and devotion to each other. I have heard numerous people refer to us as a "power couple" or mention "relationship goals" when referring to us. Take that for what you will. I believe we both deeply cared about each other, and most importantly trusted each other. I have never in my life trusted anyone more than AA. Because of my trust for her, I never got jealous, often to her playful annoyance.

AA was always the light in every room. She had a very bubbly personality, an incredibly infectious laugh, and made everyone feel special and loved. She was selfless to a fault. She was/is a truly amazing person. She also had a passion for kids. She was unable to even get through a movie where kids may be harmed.

AA worked from home as a (redacted), running a fairly successful home-based business. I work in (redacted), which allowed us to have our evenings, weekends, and holidays together. Our free time was usually spent with the kids, with AA's family, being active, or just bumming around the house. We were always very affectionate with a healthy sex life. We have both been married before, so I think we had a healthy respect for this being our second marriage and wanting to do it right. Since AA's previous husband traveled a lot for work, which eventually led to infidelity on his part from my understanding, it was important for AA to have a stable and "boring" life. She said she wanted someone to be home at nights, someone who she could trust, someone who wasn't ALWAYS on the go, and someone she felt safe with. I took that to heart and tried to provide that lifestyle to the best of my ability. I also want to point out that the kids are not biologically mine, but from very early on they became "my kids". I wanted to be the father I never had, and I wanted AA to feel loved every day. Probably to a fault at times. The

irony of this is that the very things AA hated about her previous marriage, is what Tim manipulated her into becoming.

I should mention that I was always very financially conservative and somewhat of a minimalist. I still drive the same 22-year-old car. When we met, I felt the need to provide financial stability for her and her kids. I never had a need for a fancy lifestyle and felt that I would rather sacrifice instant gratification to take care of what needs to be taken care of. The kids never went without, they still participated in sports and dance, and we went on family vacations and had plenty of experiences. We just didn't live lavishly, even as our financial position improved. I wanted to touch on this, because eventually because of AA's involvement with Tim, our finances started spiraling out of control.

Introduction to OUR/Fundraiser

Sometime in the summer of 2021 AA was introduced to OUR. Her passion immediately took over and she decided to sponsor a fundraiser for them. She worked tirelessly over the course of a few months to make that happen. Once AA gets passionate about something, she becomes obsessed with it. I helped her as much as I could, helping leverage some relationships to get donations, setting up websites, running some of the finances etc. The Fundraiser took place in August of 2021 and was very successful. She had a great turnout and raised close to \$25,000. Looking back in hindsight, it's quite sad to know that \$25,000 probably didn't even cover one of Tim's "operations", considering the five-star hotels, first class tickets, and alcohol bills I would later come to see.

Community Outreach

After the success of her fundraiser, AA was offered a job at OUR, working in community outreach. She was in charge of volunteers for several states. It seemed like an entry level position, but again AA gave it all she had. She attended and supported every event she could, even covering for her counterparts who seemed to not take the job as seriously. Again, I tried to help when possible, volunteering at multiple events, running booths, selling merchandise, etc. All for the good of the cause she so believed in. Every dollar raised was going to help save a child in her mind.

Simon Brewer

AA applied for and got the job of (redacted) to (redacted), the CFO/COO at the time for OUR. She didn't have much experience in that field, but she had a go-getter attitude and was willing to learn. Many evenings were spent with me helping her make spreadsheets, word certain emails, etc. (Redacted) treated AA well, and I was always ensuring she made work/life balance a priority.

Family Reunion/Meeting Tim Ballard/Meeting Janet Russon

Summer – 2021 (I believe July, perhaps August)

The event was put on as a company get together. AA and (redacted) (redacted) helped organize the event. This was the first time I physically met Tim and Janet.

Family was invited to the second portion of the event, which was held at Fat Cats in Saratoga Springs. There was a bowling session, where families could mingle, followed by a screening of a couple of movie choices. I believe that is the first time I watched *Sound of Freedom*, since that was available as one of the

options. I thought the movie was well done, but it seemed a little far-fetched and it seemed like it probably took many liberties with the story.

After the movie, I met Tim in the lobby. I was walking out with AA and Tim was standing there with (redacted) and Matt Osborne (I believe). I cannot remember exactly how it happened, but I believe (redacted) stopped us and introduced AA to Tim, at which point I also introduced myself to him. What I vividly remember is how Tim sized me up at that moment and made some comment about my build. I remember because it seemed awkward and he stared at me for a little too long. In fact, Brad made the joke to stop staring and that he was being creepy. We all laughed, but as I walked away I told AA "that was weird" and she said "yeah."

After the Fat Cats session, everyone met up at a lodge in Millcreek Canyon for dinner. AA was running around making sure the food was properly handled, tables were set, etc. I helped her with whatever I could, including set up and take down.

Tim gave a speech at the event, and it seemed very odd. It was very passionate and awkward at the same time. It seemed like some Executive was just recently fired by the organization, and Tim seemed more concerned about berating that previous executive than anything else. It seemed very cultish and a tone of "you're either with us or against us!" and don't question the company type thing. I thought it was particularly odd to do this on stage in front of other employees, given that it seemed like an HR issue of sorts.

During the mingling period, I also met Janet Russon for the first and only time in person. What stood out to me, especially in hindsight, was what Janet said to AA. After some brief conversation, she looked AA up and down and said, "I have a feeling I'll be working with you a lot in the future." I chalked it up to just being kind of weird and did not think much of it at the time. Now looking back, I get chills thinking about that moment.

After the event, I remember AA, (redacted), (redacted) husband, and myself were left to do the final clean up. I thought it was a little strange that Tim didn't stick around to help afterwards. I guess he was too important.

Time With Tim Ballard

October 2021 – Evil enters our world.

Sometime in October of 2021, AA tells me that she was working late at the OUR building in (redacted)'s office, and Tim walked in unexpectedly. Tim tells her that he had some sort of supposed revelation, and that he saw her face, and didn't even really know who she was, but he knew that she needed to be the next female operator on the upcoming mission. He tells her that he cannot believe she's here, at this hour, when he just happened to drop by, and that it has to be a sign from God.

AA asks me what my thoughts about her going on a mission are, and my initial reaction was "hell no!" I remember her being somewhat disappointed and trying to convince me of all the reasons that it would be good. After some conversation, I felt like I couldn't deny her the opportunity to experience this, especially given her passion. I asked a multitude of questions and had many reservations about her going. I was especially concerned about her safety. I wanted to know details of the security team, how they operate, is she insured on these trips, what her role would be, why HER out of all people since she

has no training in any sort of undercover work, no law enforcement background, and so forth. It was a HUGE red flag for me, but I also wanted to support my wife and not have her resent me for denying her this opportunity. I was given some assurances of safety and some vague answers, which were less than satisfactory, and largely probably due to the fact that AA was also not really given any straight answers. I very reluctantly agreed to the mission. Afterall, this was such a good cause and they were trying to “save kids”. My only ask was that she check in with me as often as possible so that I knew she was safe.

AA went on her first “practice mission” to California to practice. I remember being somewhat frustrated with the lack of communication while she was gone. When she got back, she was excited that she did really well on the mission, and Tim told her she was a natural. She was so excited that she was finally going to be able to make a difference. Tim of course filled her head with visions of grandeur in regards to the impact she can have and how many kids she would be able to save.

I asked AA why there was such a lack of communication, and how we agreed how important that was, and she skirted around the issue saying that she was extremely busy on the OP, that things move fast, that she couldn’t really have her phone around, that she was not able to think about being in her role and being a wife/mom at the same time, that contacting me would not allow her to be in character, etc. This became more of a theme as time went on to the point where communication was almost completely broken between us.

Again, with the benefit of hindsight, I now know that this was carefully orchestrated by Tim. He purposely isolated her, put her in uncomfortable situations, and sexually harassed her during that trip to “build chemistry” and make sure she was up to the job. Looking back, this was the first time in our marriage that I can identify as my wife purposely withholding information from me. She knew that if she told me what really happened on that first “practice mission” I would have put an end to all of it. She was also sworn to secrecy by Tim to not share anything that happened, even with me, since people don’t really understand “what it takes to save a child” and the whole dark world they need to operate in. Tim began his grooming process with my wife.

At one point, one of my co-workers, who has been with me as a confidant every step of the way through this, and I joked that if we didn’t know any better this would be a perfect cover up for an affair. Exotic places. No communication. Traveling with another man... all covered by the most noble of causes. How ironic that proved to be.

Over the next few months, AA went on several more missions. Each one became progressively more frustrating, and tension started to build in our home. She began to withdraw emotionally and physically. I felt like something was wrong, but we were unable to have real conversations about it. Many times when she would talk about the missions, I would point out that it seems like she was being put in extremely dangerous situations. Things such as booking flights and hotels under her own name, Tim being a recognizable public figure, the possible danger of facial recognition, and so forth. I asked about security teams and the answers seemed off. It just didn’t sit right with me. I also started questioning why I never had any interactions with Tim. It seemed odd. It got to a point where I finally said that if she continues to put herself in that kind of danger and disregard the potential impact this can have on her family, then I would rather just bury my head in the sand and not know about it. She would later go on to say I never wanted to hear about operations, which was not true. I was never told the true nature of operations, only vague information that never added up.

At one point, AA said she needed to get very provocative, almost nude, and have boudoir style pictures taken. That was a shock to me. I had major concerns about that and felt like that cannot really be a serious request. She said one of the traffickers they met said she could use those photos to infiltrate dark web sex rings. Tim thought it was the best idea, and convinced AA she should do it. I was powerless to stop her. At one point she contacted a photographer who wanted \$6000 just as hazard pay to take the photos because of the risk of them potentially being traced back to the photographer. Nevermind the fact that my wife's actual face was about to be exposed to God knows what kind of danger. I tried to point out the extreme danger of doing this, but AA didn't want to disappoint Tim since he thought it would be such a great way to save more kids. Mind you, AA never got any additional hazard pay, life insurance, or anything during this time. As a matter of fact, she was kept a secret from many people at OUR.

While she was doing these operations, Tim kept assigning her more and more administrative things to do. She was asked to juggle her regular job responsibilities as (redacted)'s (redacted), while working on special projects for OUR, working on more personal items related to Tim, and being an undercover operator. Her time with the family deteriorated to almost nothing, and when she was home, she was not present. It started majorly affecting our relationship, the kids, her relationship with her friends, and with our extended family. I began to self-isolate as well because I got tired of the constant questions of "Where is your wife?", "can you have your wife text me back?!" "Why isn't AA here?" etc.

Until recently, I have NEVER heard the words couple's ruse or been told the actual part AA played. I was told she was a "Madam" of sorts. Again, the details always made the stories fall apart, but the more I tried to understand, the more tension it put on our marriage. Eventually, I had to just go along to get along.

AA eventually transitioned to become Tim's full (redacted). She would do everything for him from getting his car detailed, to taking him to doctor's appointments, to picking up his medication. This transition was a mess in and of itself. She was promised multiple positions, bouncing back and forth for a while in a limbo state of frustration. She was told she would become the Deputy COO for the company. Essentially Tim wanted her to spy on everyone in the company. She was also promised huge raises which never materialized. That would become a theme during her time with Tim as well, especially in her time after leaving OUR and working for Tim Ballard or Spear Fund.

Another theme that caused concern from my end was that people would turn over at a rapid pace within OUR. Seemingly high-level positions seemed to be there one day and out the next. Everyone was always "out to get" Tim. The only consistent "Good guy" doing God's work was Tim. Anyone that would dare question him would be disparaged beyond belief. I pointed this out to AA overtime and said I don't know who the good guys or bad guys are anymore. But there seems to only be one constant. That didn't really sit well with her.

Our conversations and arguments started becoming increasingly more Tim Ballard focused. I knew something wasn't right. I just could not properly navigate the conversation without it ending up in an argument. AA would accuse me of accusing her of having an affair. I don't remember that really being a true possibility in my mind until about July. But I certainly felt like Tim was manipulating her in some way, and AA started to change to a person I was not able to recognize. The affection was almost completely gone, the conversations were all combative and defensive. The light that was once hers was not shining anymore. Many people around us observed similar things, although we kept things really private, so no

one understood the extent of what was happening. I don't think we even really understood the extent of it all.

In May of 2023, I won an all-expenses paid awards trip to Cancun for me and a guest. I was extremely excited for the award, and even more so for the vacation AA and I could have on our own at this unbelievably beautiful resort. I ended up extending the vacation by 3 days on our own dime prior to us leaving, so that we can have some extra, MUCH needed, time alone. I asked AA on many occasions if we can PLEASE just set work aside for those 6 days and focus on us. Just disconnect and be together. I was promised that would be the case. It wasn't. Tim kept her occupied the entire time. It was hurtful and frustrating, and caused more damage to our relationship. Oftentimes Tim would call just to be consoled by her because of everything that was going on. I remember thinking "I'm your husband, and I need you. He has a wife of his own. Let him talk to her", but if I brought it up, it would cause an argument.

Around the same time, things started really escalating at OUR due to the sexual assault allegations brought forth against Tim, as well as the *Sound of Freedom* movie scheduled for release. I was told by AA that (redacted) went on an operation with Tim and that she was now causing trouble, making allegations against Tim. Eventually Tim would be fired by OUR, which was later recanted to allow him to resign. I was constantly being told how the devil got into OUR and how Tim was being railroaded. I was told that Tim was fired because he held (redacted)'s hand on an operation to protect their cover. That made ZERO sense, but I remember hearing AA and Tim on speakerphone discussing it, and Tim passionately stating that nothing happened, that HF is "crazy", that she's crazy like all the other crazies before her, and that he only held her hand. I would later learn the real story, but at the time, that story was very hard to accept. But again, my only option felt like believing it to support my wife, or risk ending the marriage. Those truly seemed like the only options.

During the investigation period, Tim was OBSESSIVELY calling my wife at all hours of the day and night. He needed continued reassurance that he would not be going to jail, that there would not be other women coming forward, and that he did nothing wrong. He talked about the other women so often that I finally asked AA why he was so worried about other women if there was no truth to it, and that it seemed like there was something to that story. AA wouldn't hear it, and again it became an argument over me "hating" Tim vs the facts of what was going on.

Shortly after Tim was fired, he coerced AA to follow him on his new venture, which included the SPEAR FUND. I heard him on multiple occasions telling her how much of an impact this will have, how much more free they can be to do actual work that OUR doesn't do anymore, and how much money they would make and how much she would make. I remember at one point AA saying they are going to at least double, if not quadruple my salary from OUR. That seemed insane, but ok. He also kept talking about "Fat" bonuses she was about to get after the *Sound of Freedom* tour, and making other extravagant claims. The whole thing seemed very shady. One time we were sitting in my car outside of her parent's home, and AA and Tim were discussing pay. I told her to put it on speaker. Tim was talking about how she was going to get paid through Spear, and then he was going to also pay her through Nazarene fund as a supplement because "no one watches that fund." I told AA that none of this sounds right, and is she sure she trusts him? I think AA was just as confused at the time as I was and was frustrated by that. On multiple occasions after that I asked AA if she was SURE she was hitching her wagon to the right horse. I believe by that time, she had no other options but to trust Tim.

Eventually AA received a termination letter from OUR. Not long after Tim. It did not lay out any of the promises Tim made, specifically the negotiated 1 year severance that Tim promised. It actually laid out strong language that seemed like AA was getting fired and was not eligible for re-employment. I got really concerned about that and immediately reached out to AA. AA was on a plane with him when I reached out via WhatsApp. Tim assured her that it was all a mistake and spun it. Of course, again I was becoming the bad guy by questioning him.

This was all leading up to the release of *Sound of Freedom*. If I thought AA was overworked and absent earlier, nothing really prepared me for what was to come. To say she worked 7 days a week, 20 hours per day, is not an exaggeration. Communication between us became almost non-existent, and the only topic of conversation when AA was present was Tim/*Sound of Freedom*, the talk show circuit, the TV circuit, etc. There was so much excitement around it, that what little of AA was left for our family was consumed by that.

The travel schedule got out of control. At one point our 17-year-old son actually had a mental breakdown when he found out AA was leaving again. I tried talking to her, but this was all too important. I couldn't wrap my head around WHY she always had to be with Tim. She said he is unable to do anything by himself, he gets lost, he doesn't show up to places, and that he always NEEDS her to be there. She was his employee, not his wife. It became very frustrating and painful, and honestly something just seemed so off. I started thinking for the first time that maybe there was some sort of an affair. If not physical, then perhaps emotional. It made no sense at all. At this point they are not saving kids, they are not on missions, they are just traveling around to build up Tim's brand and feed his ego. How could she not see this? The movie was bringing awareness (which I now do not believe to be true, since it's all fiction), but this was not what she was so passionate about.

Moreover, Tim was having AA personally finance many of these trips with her own credit cards. I still to this day do not understand why he would put her in that sort of financial position. This caused a lot of issues between us, needless to say. Not only was AA working on a promise and a handshake, with no actual income coming in, she was forced to finance Tim's brand by paying for all the travel, hotels, restaurants, etc. during his *Sound of Freedom* Tour. It was a source of intense friction between us, and somehow it always boiled down to her accusing me of accusing her of something. The power this man had over her, and the level of manipulation and brainwashing was unbelievable.

AA opened additional credit cards to keep financing things once her main card was maxed out. She put a total of close to \$50,000 on personal credit cards, some of which was eventually reimbursed by Angel Studios, and some by Tim's Rockwell company. However, for months, she carried his debt, financed his expenses, and it seemed like the reimbursement was always around the corner but never quite there. I mentioned earlier that I've always been debt adverse and financially conservative, so that put a lot of strain on our marriage and how we handled finances. It basically all spiraled out of control with no end in sight.

In mid-July, AA left for New York for a screening of *SOF* with former President Trump. She took my son because Tim promised him he could meet Trump. What a great guy. He was so excited, and all I could do was act excited for him. I even "proudly" shared a picture of my son with Trump on social media to support his experience. Inside I was dying. I need my wife. She didn't need to be there. But it was "cool" and Tim was "cool" so I endured it. I decided to email her a letter explaining my feelings. It was a

heartfelt letter explaining all my feelings. Admitting all the mistakes I thought I made. Trying to take blame for things that I may have done or said to add to our current state of marriage. I laid out my feelings of distrust towards Tim and my desire to find a way back to each other. I never received a response.

In late July, AA left for a work trip to Miami with Tim. She was supposed to return on a certain date, but her plane got delayed, then canceled. I helped her find another flight home, but then that flight also got canceled. I started getting suspicious, so I checked the flight tracker and noticed that it was not in fact canceled. I called her at her hotel, and it sounded like there were whispers in the background. I questioned her and she got extremely defensive, and the conversation ended. I do believe the flight cancellation was legitimate, it just happened to coincide with some of the storms happening and was later verified. However, at the time it didn't help my suspicions. I point this out because it all led up to what became the catalyst for our separation and path to divorce.

That night, I had multiple panic attacks. I didn't know what was going on. My wife was gone and I was left alone to fill in the gaps. I decided to book a flight to Alaska to visit some family there, and be somewhere where I could feel safe. I stayed for 10 days, and completely neglected my work duties during that time. I just needed to get my bearings. A good portion of the time was spent in bed, lamenting or crying, not being able to sleep at night, mind racing about what was happening in my life, how we got here, and how I could protect my wife from something I increasingly felt was dangerous and wrong. I wrote several notes to myself in my phone of my feelings at the time to process, instead of sending them to my wife, because I was afraid of her reaction. I eventually shared them with her. We had several fights in Alaska, all centered around Tim. I was afraid of what I was going to come home to.

I returned from Alaska early on a Wednesday morning. AA opened the door and gave me a big embrace. I breathed a sigh of relief. We had a great 3 days afterwards until that Friday evening. AA stayed at work late, and talked to Janet Russon for a long time. I'm not sure of Tim's involvement at the time. She eventually returned home around midnight. I waited for her in bed until almost 2am. Eventually I made my way to the basement and asked her what she was doing. She said she was looking for hair color for her mom. At 2am I asked? She got frustrated and came to bed. I couldn't fall asleep after that, something felt wrong and off again. I went downstairs and found her cellphone in the storage room for some reason. For the first time in our marriage, I decided to read through her text messages and check her call logs. I found that Tim had been texting her all night and asking her to call him when she got home. I was sick about it. He said he wanted to "be there for her, but only if it helped HER"... it was all "for her"... She spent an hour on the phone with him after midnight. I was sick about it. Didn't understand. I thought we had a breakthrough and then that happened. I walked upstairs and confronted her about it. I then proceeded to scroll through her phone and found multiple other inappropriate messages from Tim to AA. One was joking about handjobs and blowjobs, another was asking her if she has made love to an operator named Alex yet. It made me absolutely sick. I still didn't think there was an affair, but I also thought I was lying to myself. Why would her BOSS send her such inappropriate messages, sexual in nature. I knew at that time he was grooming her. I didn't know about what happened on operations yet, but I thought this was him grooming her because he was able to manipulate her into thinking she was in a terrible marriage. I told AA that night I had enough, and I wanted a divorce. The next day we didn't speak at all, and the following Sunday she left on a work trip again. I didn't really want a divorce, but I was desperate. I thought maybe if she understood the depth of seriousness here, then she would snap out of this. But instead, she left, to be by Tim's side, because "he needed her there."

At this point, I did confide in a few very close friends. They were absolutely stunned and shocked at what was happening. The common theme seemed to be they always knew how much I loved her, how glowingly I spoke of her, and how proud I always was of her. One said I was always her “#1 cheerleader” through everything. So when things started unraveling, it seemed unbelievable. When they heard about why, it only got more baffling and confusing.

I went to work the next day and wrote her another letter. Instead of filing for a divorce, I thought I would make one more appeal to her. I delivered the letter when she returned, and it was not well received. I know now it was because of Tim’s manipulation.

I asked her as a final plea to come with me to her parents’ house. To see if they can mediate some of this conversation between us. That also went terribly wrong. Later on, I found out some of that conversation, very private and intimate details, were shared with Tim. Tim then proceeded to ridicule and make fun of me behind my back to my wife.

When we returned home, I checked her messages again. There was more conversation between Tim and her. More manipulation. More Tim wanting to “be there for her.” At that point, I lost it. I confronted her, wrongfully, and loudly about the affair. I couldn’t think of any other reason. It was not a good scene and I deeply regret it. She took the kids and left the house and went to her parents’. My son and mother-in-law came by later and I spoke with both of them. I apologized. My son and I cried. My son kept asking if we can please fix whatever is going on. He was so confused. He said how we have always all loved each other so much, and he doesn’t understand what’s going on. He said he knew it had to do with Mom’s work and Tim. I didn’t want to go into it then, but I assured him I would do whatever I could to see if we can work it out. I also spoke with my mother-in-law, who asked that I just give AA some space. She said she’ll realize her fault in this and come around. I agreed I would do that, and I did. Before she left the house, I said something along the lines of I know Tim for who he really is and I’m going to expose him.

The next day I got a call from a work colleague at another bank. He sounded very concerned and said he didn’t know what was going on, but was told that another one of his colleagues, (redacted), received a disturbing phone call about me. The caller said I was involved in some sort of assassination attempt on a political figure and because of my hacking and interference, multiple people’s lives were at stake in Ecuador. This was INSANE. I went upstairs and opened AA’s laptop, which was signed into her iCloud, and I found a message to her from Radd Barrett saying that he had contacted my industry, referring to me as AA’s “Estranged Husband”, as well as numerous government entities to warn them of my hacking attempts and my involvement in the Ecuadorian incident. I was completely shaken and stunned. My “hacking” attempts consisted of looking at my wife’s text messages on her phone and her iCloud. Neither of which she was hiding. The phone had the same lock code on it as long as I could remember. This escalated to a level I never imagined. I called AA and she was also upset. She was aware of it and was working to fix it. I went and filed a police report about it with the South Jordan Police Department to protect myself.

That same day I called someone I knew and trusted who worked for OUR. I wanted to know if my intuition on Tim was correct or if I was completely off base. If I was wrong, and Tim was a good guy, I wanted to know. If I was right, then I wanted confirmation. He confirmed all my feelings about Tim and asked if I wanted to talk to their current CEO, (redacted), since he might find this information helpful. I said yes, I did. I was mad and frustrated and I wanted to get answers.

The next morning, I got a Facebook Messenger message from (redacted), (redacted)'s husband. He said, "call me." We had never spoken before, but I knew who he was. I called him immediately and the unraveling of all the information and all my fears started. I immediately asked (redacted) if Tim really "only" held (redacted)'s hand, at which point (redacted) filled me in on the entire situation. He said (redacted) did everything with Tim, including Oral Sex, and rubbing of genitals stopping short of actual penetration. He told me about the Couples Ruse, the spiritual manipulation, the other women who wanted to come forward. Everything hit me like a sledgehammer. I asked if AA was ever a part of this to which he answered, "She was in the deepest and the longest" from what he heard and said she was "Tim's mistress" for the better part of the year. I asked him to meet me in Lehi, to which he agreed. I didn't want to believe it, but he showed me text messages of some of the disgusting exchanges between Tim and (redacted). It was clear that Tim was grooming (redacted) in the messages. AA and I were not speaking at the time, and she was ignoring me, so in desperation I called RB, Tim's family member. I met RB before, and I knew AA and her were close. I wanted to know if any of this was true. RB confirmed the Couples Ruse but said she didn't know of an affair.

Later that morning, I received a cryptic message, followed by a threatening phone call. I hung up when the person wouldn't provide me their name. They called back and left a voicemail saying, and I'm paraphrasing, that "I had an easy way out. I should have taken the way out. That I will see how tough guys end up. That I'm a pussy. And that they will ruin my career in my industry." I reverse looked up the number and found out it was Radd Barrett. The same person who told AA that I was responsible for hacking attempts in connection with the Ecuadorian assassination. I also found out that Radd was working for Tim, and was previously employed by OUR. When I informed OUR of Radd's threats, they were surprised he worked for Tim and said, "they must really be scraping the bottom of the barrel to have Radd involved."

Later that day, I met with (redacted) at OUR's headquarters around 4pm. A few minutes into the conversation, (redacted), a lawyer for OUR, joined our meeting. David couldn't say much due to his gag order, but I wanted to find out if what I was hearing about AA, Tim, (redacted), and other women was true. (redacted) (redacted) was unable to directly answer any questions, but there were some implications made that I was not wrong. I knew about (redacted), and no one there denied it. They said they never directly saw AA be inappropriate with Tim, but there was speculation. They said AA was the only one who defended Tim in her report to the investigator. I later found out that Tim made AA cover for him and withhold certain pieces of information. Again, I don't blame her, given the level of manipulation I have now discovered by this man. (redacted) and (redacted) both said that Tim is a MASTER manipulator. I later spoke with Matt Osborne and the conversation was similar to the one with (redacted). They both genuinely seemed concerned for me, for AA, for our marriage and situation, and were very sorry to hear what was happening. I asked at one point if they felt they needed to protect her, and why they didn't, and their answer was that they tried but Tim would basically bully everyone into submission to get his way. That also seemed to be the case with the firing/resignation.

All of this happened in early August, and life since then has been absolute Hell. I've lived in fear over how Tim might retaliate. I took almost 2 months off work for mental health reasons. I was unable to perform my duties. I completely neglected my responsibilities. Thankfully my employer has been supportive through the process. It has been humiliating having to explain to upper management why I am unable to work. Or to not lose credibility with clients.

I've had sleepless nights after sleepless nights, not being able to get through a full night's sleep without waking up and thinking about what has happened and what this monster has done. I've prayed for God to take me in my sleep on multiple occasions. My family was my life, and this man tried to take it away from me. For what? For his sick fantasies? Many times, I felt like I was screaming under water and no one could hear me. I felt powerless against Tim, against his resources, and his almost cult-like following in Utah. I fully understand why his victims are scared to death to come forward. I have heard him say before that "They have one stone; I have a thousand." I've also been warned about Tim's vindictive nature and his readiness to bully and destroy anyone who dares to stand in his way.

Until recently, AA has cut off communication with me, as did her family (who I thought was my family as well). When I tried to bring these things to light, I was gaslighted into thinking I'm crazy. I believe Tim was able to manipulate AA's family through AA. Her family and I always had, what I believed to be, a very good relationship. I was always first to help in any way I could, always pushing to spend Sundays with them, always looking forward to holidays, etc. I was and am deeply hurt how they have all turned on me. Her dad went as far as threatening me via text if I harmed her once when she and I were just talking. It was extremely painful. I am still uncertain how people you have known for so long, who know your character, who have seen how you've treated and loved their daughter and grandkids for 12 years, can turn so quickly. The only person to reach out to has been her brother, to apologize for berating me in a call once. I told him I didn't care about that, apology accepted, but that I believed his sister was in danger. Regardless of what he heard or thought of me, I wanted him to please at least consider that. He said he wasn't interested in being involved in our drama. I can only imagine that under the influence and direction of Tim, terrible things have been said about me. And this whole story is literally almost unbelievable, so a part of me doesn't blame them for not believing it at the time. They have treated me like some sort of mentally disturbed criminal, all the while I was just trying to protect their daughter and my family. But I know they have now seen the reports, the news, and have spoken with AA, so hopefully their opinion changes.

Tim has repeatedly influenced AA, and tried to manipulate her into getting the text messages he knew I had regarding (redacted) so that he can get ahead of it. When AA and I resumed our communication, and I thought we were rebuilding our trust, he purposefully used that to get information. At one point and time AA told him she's running an operation in her own home, asking him what information he wanted her to get, and what he wanted her to do. I know this was not of her own doing, and that is now clear given recent developments, including her finally realizing who Tim is and what has happened.

He made her believe I was controlling and manipulative myself. I think she started to see everything through that lens after a while, until she finally saw him for who he is.

Tim would call AA obsessively, day and night, without boundaries. With what I have seen in limited texts, I can only imagine what was said in hours upon hours of conversation. According to AA, most conversations centered around Tim, his mental state, his need for validation and comfort, and his issues. That doesn't surprise me at all given his narcissism, but I am sure it was deliberate to build trust, loyalty, and to manipulate them. He would even say things like "I'll put a bullet in my head" if you ever leave me or betray me. AA would also spend hours on the phone with Janet, the psychic, who I believe was Tim's enabler. I think he would often manipulate people through Janet.

At one point, Tim actually suggested to Radd to get AA a divorce attorney who would purposely entice me to harass Tim and Spear Fund so that Tim could retaliate against me. Even Radd thought that was probably going too far.

Another interesting finding was stumbling upon some of AA's notes. One in particular was extremely disturbing. Especially when I read it without the benefit of context. The note was describing some sort of trance or spell Tim was under while under the influence of Ketamine. He was talking to Nephi, Thom Harrison, and others. He was talking about past lives, and how he and AA were together in a past life held captive. He was saying that AA was an angel and chosen by Katherine to carry out these missions. The note dates back to January 8th I believe, of 2023. It lines up with the time he was grooming, harassing, and sexually exploiting her during his "operations." Later AA told me he asked her to drive him to that treatment and stay to take notes. I believe he deliberately and purposefully said the things he said during that treatment, under the guise of not knowing what he's saying, as part of his spiritual manipulation process. Perhaps it didn't have the impact he expected because we are not LDS. I'm not sure, but I know it was calculated.

I believe AA was a victim just as much as any of the other women. She was used, exploited, manipulated, coerced, and duped by the best of them.

Tim does not care about anyone or anything besides himself, his image, and his money. He will use whatever he can for personal gain.

Unfortunately, he has destroyed our marriage and our future because of his selfish narcissism. He broke relationships that meant more than anything to me. He affected my work and my ability to make a living. I have no idea if/how AA and I can find a way forward, but I know it will never be the same. Some things cannot be undone. And that is something that we will have to live with for the rest of our lives. I hope Tim realizes the depth of destruction he has caused to not only me, but to other husbands, and the women he decided to victimize.