

# **EXHIBIT 1**

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**IN THE FOURTH JUDICIAL DISTRICT COURT  
UTAH COUNTY, STATE OF UTAH**

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TIMOTHY BALLARD,

Plaintiffs,

v.

AMY MORGAN DAVIS

Defendant.

**DEFENDANT'S ANSWER**

Civil No.: 240404685

Judge: Denise M. Porter

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Defendant Amy Morgan Davis, by and through counsel, hereby answers  
Plaintiff's Complaint and alleges as follows:

**INTRODUCTION**

Timothy Ballard has brought this case in retaliation to being held accountable for

his sexual harassment, grooming, battery and assaults, and COUPLES RUSE fraud. The entire text thread<sup>1</sup> between Ballard and Defendant show that Ballard was using his modus operandi of trafficking and grooming women and then discarding them:

1. He meets a woman he finds attractive.
2. He suggests that there is an upcoming OP in a foreign country and that she would be perfect as his COUPLES RUSE partner.
3. He sends his trusty side-kick, Matt Cooper, to have the woman sign an NDA.
4. He explains that the COUPLES RUSE requires he and the woman to practice in compromising situations in strip clubs, both in and outside of Utah.
5. Once the woman questions his tactics, he reports her to OUR management and ghosts the woman.

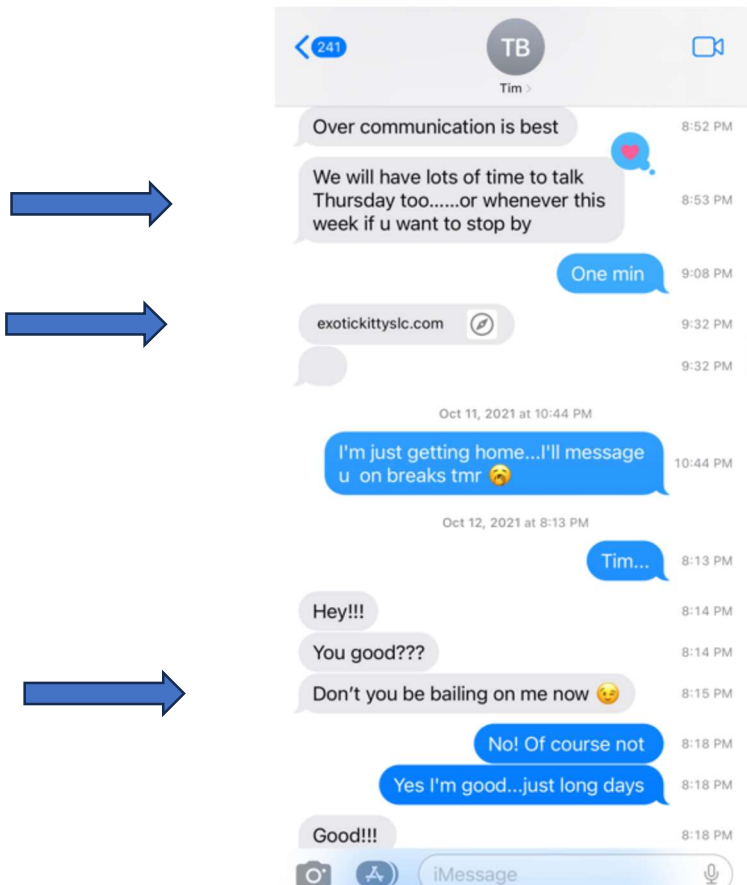
Ballard has used this grooming tactic with JJ, Kira Lynch, Celeste Borys, Sashleigha Hightower, Krista Kacey and Mary Hall and others.

Had Ballard chosen to attach all the texts between he and the Defendant, it would be observed that Ballard was asking Defendant to go to strip clubs and exotic massage parlors. Defendant declined as she was uncomfortable. He was telling others within OUR that he really wanted to go on an “OP” with Defendant because he found her to be attractive. People within OUR told Ballard, in texts and verbally, to stay away from Defendant because she has a traumatic brain injury and should not be taken to a third

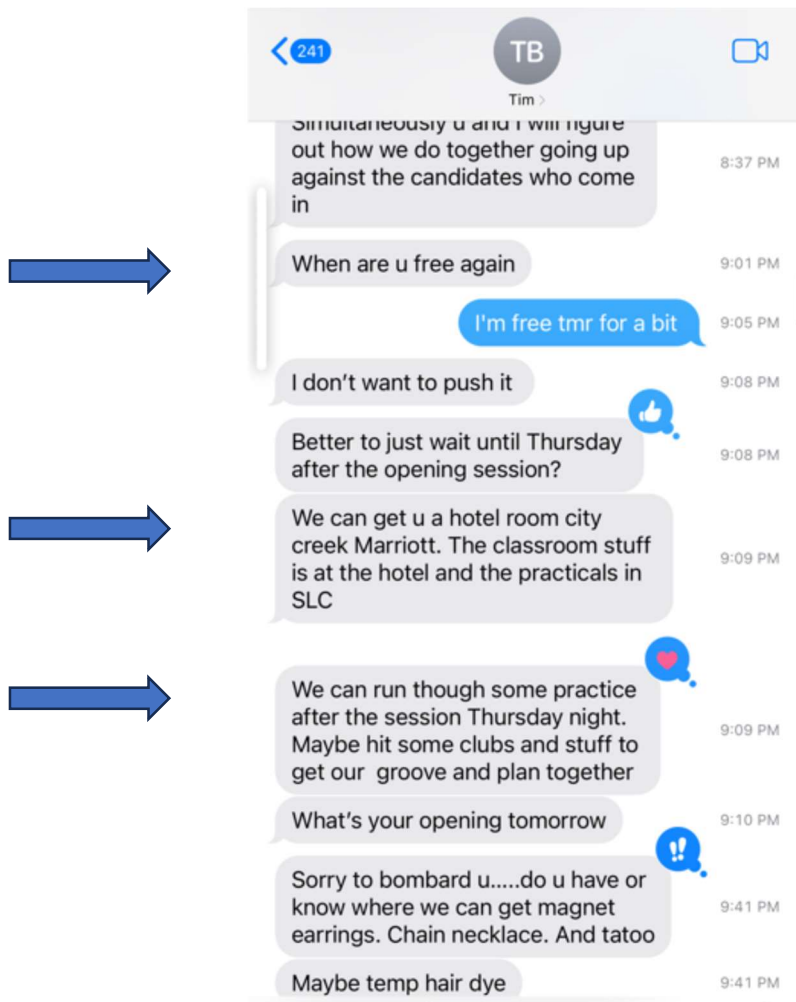
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<sup>1</sup> See [https://drive.google.com/file/d/1dqVG1MNYHU0Z3vaiwYJ8X\\_IK5Xp2eup1/view?usp=drive\\_link](https://drive.google.com/file/d/1dqVG1MNYHU0Z3vaiwYJ8X_IK5Xp2eup1/view?usp=drive_link) for the entire text thread. Hard copies are attached hereto as Exhibit A.

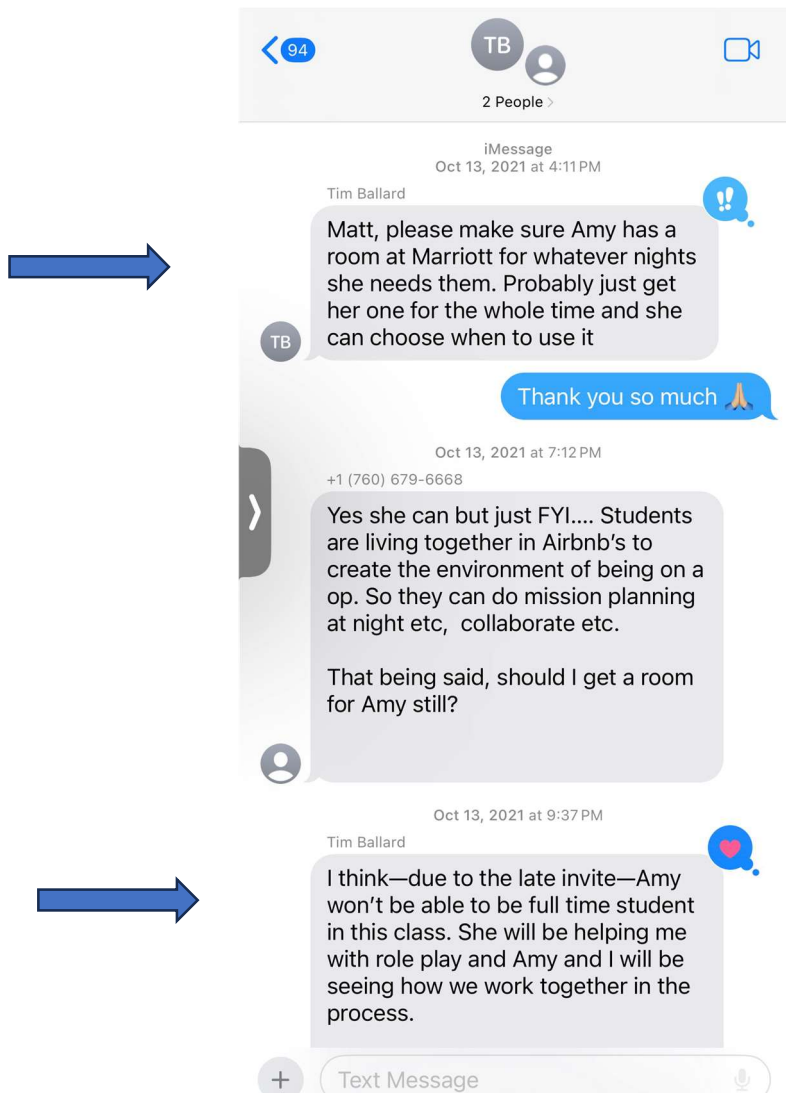
world country and placed in dangerous conditions. Ballard ignored them as he often did and began grooming Defendant. After getting Defendant to sign an NDA to be “trained”, Ballard was begging Defendant to go to strip clubs with him to “practice” the COUPLES RUSE.











Ballard begged and pressured Defendant to come to his phony training at the downtown Marriott, where she believed she was going for legitimate training, not understanding that he was grooming her and that the COUPLES RUSE was a tactic that Ballard invented from scripture study and prayer for his sexual gratification. At that hotel, with NDA's in hand and appearing to be a legitimate anti-trafficker, Ballard sexually assaulted Defendant. Not realizing that his sexual touching was not part of any legitimate training and after being ghosted by Ballard, she tried to show him she could be



flirtatious with him. Ballard uses these texts of her trying to prove herself worthy of being an “Operative” to try and destroy this woman as he is doing to the other women he has sexually assaulted.

### **FIRST AFFIRMATIVE DEFENSE**

Plaintiff’s Complaint should be dismissed with prejudice for failure to state a claim upon which relief can be granted.

### **SECOND AFFIRMATIVE DEFENSE**

With respect to the specific allegations of Plaintiff’s Complaint, Defendant hereby admits, denies or otherwise states as follows:

1. Defendant denies paragraph 1. Ballard performs fake raids, hires escorts for his own sexual pleasure, and paints it as undercover investigative operations whereby he claims he has rescued prepubescent children and women from sex slavery so he can make movies and books.
2. Defendant admits paragraph 2.
3. Defendant admits paragraph 3 in that this is a Court of general jurisdiction.
4. Defendant denies that venue is proper, as the location of where Ballard sexually assaulted Defendant was in Salt Lake County.
5. Defendant denies paragraphs 4-31.
6. Defendant admits paragraph 32.
7. Defendant denies paragraphs 33-37.

### **THIRD AFFIRMATIVE DEFENSE**

The truth is a defense to defamation claims. The truth is that Ballard is a serial sex predator and he groomed, sexually assaulted, and attempted to traffick Defendant.

### **FOURTH AFFIRMATIVE DEFENSE**

To the extent Plaintiff is requesting punitive damages against Defendant, such damages must be stricken because Defendant did not engage in any intentionally fraudulent or willful and malicious conduct nor did she engage in any conduct manifesting a knowing and reckless indifference toward and disregard of the rights of others.

### **FIFTH AFFIRMATIVE DEFENSE**

Any award for punitive damages must be stricken or reduced by remittitur or other similar judicial process to the extent such award fails to (1) bear a reasonable and rational relationship to plaintiff's proven actual damages and/or (2) fall within accepted ratios between actual damages and punitive damages.

### **SIXTH AFFIRMATIVE DEFENSE**

Any punitive damages award must be stricken as excessive and unconstitutional pursuant to the Due Process Clause of the Fourteenth Amendment to the United States Constitution and/or Utah Constitution.

### **SEVENTH AFFIRMATIVE DEFENSE**

Plaintiff's punitive damage request must be stricken pursuant to the Excessive Fines Clause of the Eighth Amendment to the United States and/or Utah Constitutions.

DATED this 26 day of September, 2024.

**ALL UTAH LAW PLLC**

/s/ Suzette Rasmussen  
Suzette Rasmussen

**MORTENSEN MILNE**

/s/ Alan W. Mortensen  
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