

EXHIBIT U

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

CELESTE BORYS and MICHAEL BORYS

Plaintiffs,

v.

TIMOTHY BALLARD, et al.,

Defendants.

DECLARATION OF DEANNA HANKS

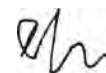
I, Deanna Hanks, hereby declare as follows:

1. I am over the age of 18 and reside in Nashville, Tennessee. I am competent to testify, and I make this declaration on my own free will and personal knowledge.

AIRBNB APARTMENT

2. My husband and I live at 1812 Lillian Street in Nashville, Tennessee.

3. Since 2022, we have been renting out the apartment above our garage as a short-term rental through the Airbnb platform. The apartment has its own separate entrance, and we have security cameras around the outside perimeter.



4. On November 8-9, 2022, I rented the apartment to Maggie Bellone. I now know that at the time, Maggie was the Executive Assistant to Tim Ballard, founder and CEO of Operation Underground Railroad.

5. It was a last-minute rental request, which concerned me a little.

6. I communicated with Maggie about the rental, so I thought that she was going to be the person staying at the apartment.

7. Airbnb automatically sends out instructions to guests on how to enter the home, three days in advance, but since this was a last-minute rental, I had to manually send the instructions to Maggie.

8. I later learned that Maggie did not stay at the apartment.

9. Instead, a man and a woman arrived late in the evening on November 8, 2022. The man helped the woman get into the apartment and then left.

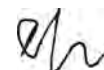
10. The next morning, on November 9, 2022, I checked the camera and saw that the man had jumped the fence early in the morning to get into the apartment, stayed for quite a while, and then jumped over the fence to leave!

11. I had suspicions. This behavior was not right. I communicated my concerns with Maggie. She apologized, but I still left a negative review about her as a guest and her boss (Brian Black).

12. This was my one and only bad renter.

AUTHENTICATION

13. Exhibit A is the negative guest review I left on the Airbnb platform about renting to Maggie and her boss Brian Black.



14. I wrote and posted that review shortly after the rental period (November 8-9, 2022).

15. The fence on the property that the man jumped over is a porch railing (approximately 6 feet off the ground) and a steel gate.

INVOLVEMENT OF LAW ENFORCEMENT

16. Around 6-12 months ago, a Utah law enforcement officer contacted me with questions about my renting the Airbnb apartment to Maggie, for an investigation he is working on.

17. I verified his credentials and then provided information to the officer.

18. Since then, I have not spoken to anyone else about it until June 26, 2025, when attorney Suzette Rasmussen and her client Celeste Borys came to my home and asked me if I had any information or documentation that I could provide about renting the Airbnb to Maggie, Brian Black, or camera footage of the trespassing incident that occurred on November 8-9, 2022.

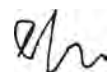
19. I shared this recollection of events with them and later checked my records for any additional documents.

20. I cannot find the original booking or transaction on the Airbnb platform, but I found the review that I wrote, which is Exhibit A.

21. Additionally, my own records indicate that I rented the Airbnb to Maggie, and I have a note that it was rented for Brian Black.

22. I also noted that they are not welcome to come again.

23. Upon learning that Brian Black is Timothy Ballard's "undercover" name, I googled Ballard and saw his photo. I am confident this was the man who helped the woman with



her luggage that evening and climbed over the gates to gain access to the apartment that next morning.

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

DATED this ____ day of _____, 2025. 07 / 27 / 2025



DEANNA HANKS

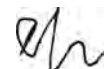
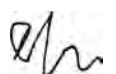


EXHIBIT A



5 reviews

From hosts · 5



Deanna, Nashville, TN

November 2022

"Maggie" left with things in good order, although she did not lock the exterior door, as requested in the house "rules".

More concerning is that Maggie booked it for 1 guest and indicated her "boss" would be staying there. However, a man and a woman - still don't know who they were - arrived at 11PM, man left after 10 minutes. He returned the next morning at 7AM climbing over the steel gates to get into the house instead of using the entrance/exits. When I called Maggie, she apologized and said she would talk to them. However, when he left again after about 4 hours, he climbed over the porch railing (approx 6' off the ground) and over the steel gate.

A handwritten signature in black ink, appearing to be 'D. Deanna'.



Audit trail

Title	Ms. Hanks
File name	Declaration.DeannaHanks.pdf
Document ID	66105549d900a505fc8ca9cb47230e08713ef3cf
Audit trail date format	MM / DD / YYYY
Status	● Signed

Document History



SENT

07 / 24 / 2025

20:20:32 UTC

Sent for signature to Deanna Hanks (deanna@hanksmail.com) from amort@mortmilnelaw.com
IP: 104.129.210.65



VIEWED

07 / 27 / 2025

23:56:17 UTC

Viewed by Deanna Hanks (deanna@hanksmail.com)
IP: 24.243.26.77



SIGNED

07 / 28 / 2025

00:00:29 UTC

Signed by Deanna Hanks (deanna@hanksmail.com)
IP: 107.77.209.21



COMPLETED

07 / 28 / 2025

00:00:29 UTC

The document has been completed.